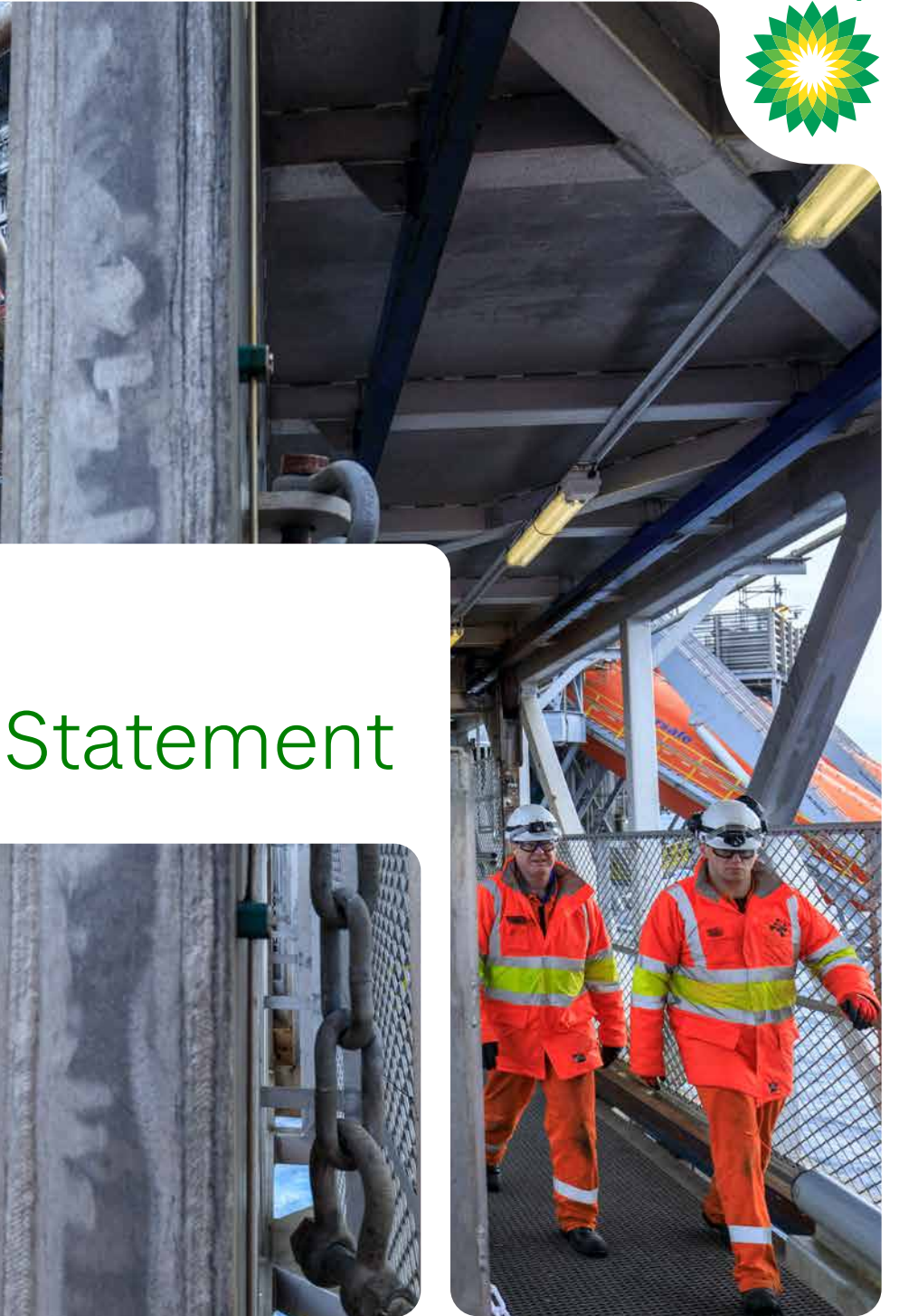




**North Sea Region**

# 2025 Annual Environmental Statement





# Introduction

This statement presents the annual environmental performance of bp's Production and Operating activities on the United Kingdom Continental Shelf (UKCS) in 2025. It has been prepared in accordance with OSPAR Recommendation 2003/5, which promotes the implementation of environmental management systems within the offshore industry.

The statement covers offshore installations operated by bp entities, as well as facilities owned and operated by third parties providing services to bp in the North Sea. It excludes bp's non-operated portfolio. All data included in this report has been previously submitted to the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) via the Environmental Emissions Monitoring System (EEMS).



# bp North Sea

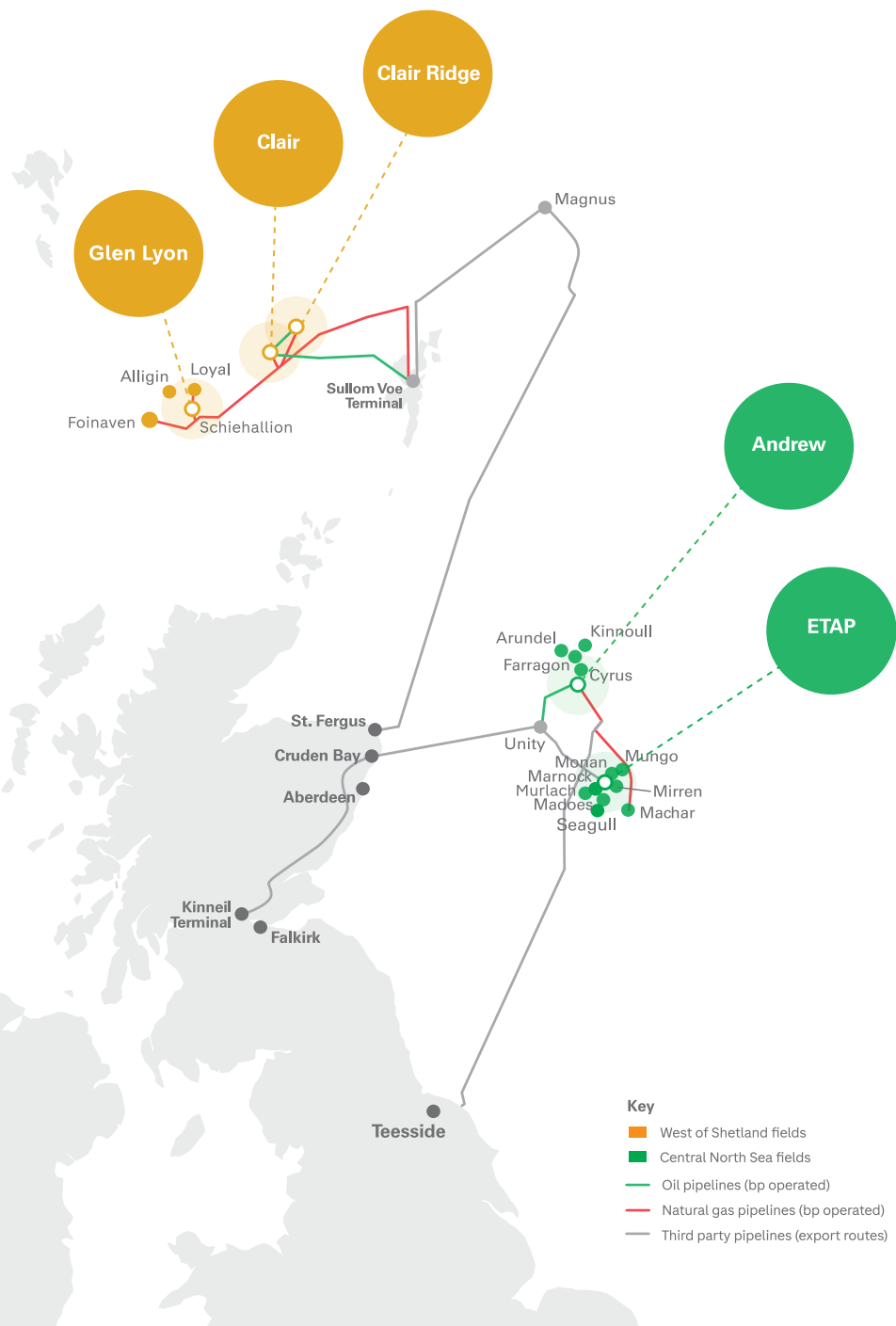
**bp's purpose is to deliver energy to the world, today and tomorrow.**

We are an integrated energy company, one of only a few that can deliver energy at global scale through a decades-long energy transition.

bp has been operating in the North Sea for more than 60 years, providing a reliable source of energy to consumers worldwide.

Today, our continued focus is producing oil and gas safely, reliably and competitively through a portfolio of five key production hubs in the central North Sea and West of Shetland.

bp's approach to sustainability is built on strong foundations that guide the way we work, underpin our focus on safety and support our sustainability framework, including our net zero, people and planet aims.



## Our sustainability frame

**Our purpose is to deliver energy to the world, today and tomorrow.**

Our sustainability frame underpins delivery of our strategy, and our sustainability aims are focused on those that we believe are most relevant to the long-term success of our business.



## Our focused sustainability aims

### Net zero operations

Our aim is to reach net zero by 2050 or sooner for Scope 1 and 2 emissions within bp's operational control on a CO<sub>2</sub>e basis, including by maintaining 'near-zero' methane intensity across our operated producing assets, enabled by supportive government policies.

### Net zero sales

Our aim is to reduce to net zero the average lifecycle carbon intensity of the energy products we sell by 2050 or sooner, enabled by supportive government policies and the decarbonization of energy demand.

### People

Our aim is to support our employees and local communities through the energy transition.

### Biodiversity

Our aim is to support biodiversity where we operate.

### Water

Our aim is to reduce our net freshwater use in stressed catchments where we operate.

This document outlines the progress being made towards net zero operations and supporting biodiversity in the North Sea, along with broader environmental updates across our North Sea activities.



## 1. Glen Lyon

The Schiehallion area incorporates the Schiehallion, Loyal and Alligin fields located around 175 kilometres west of the Shetland Islands. The fields produce through the Glen Lyon floating production, storage and offloading (FPSO) vessel.

## 2. Clair Phase One

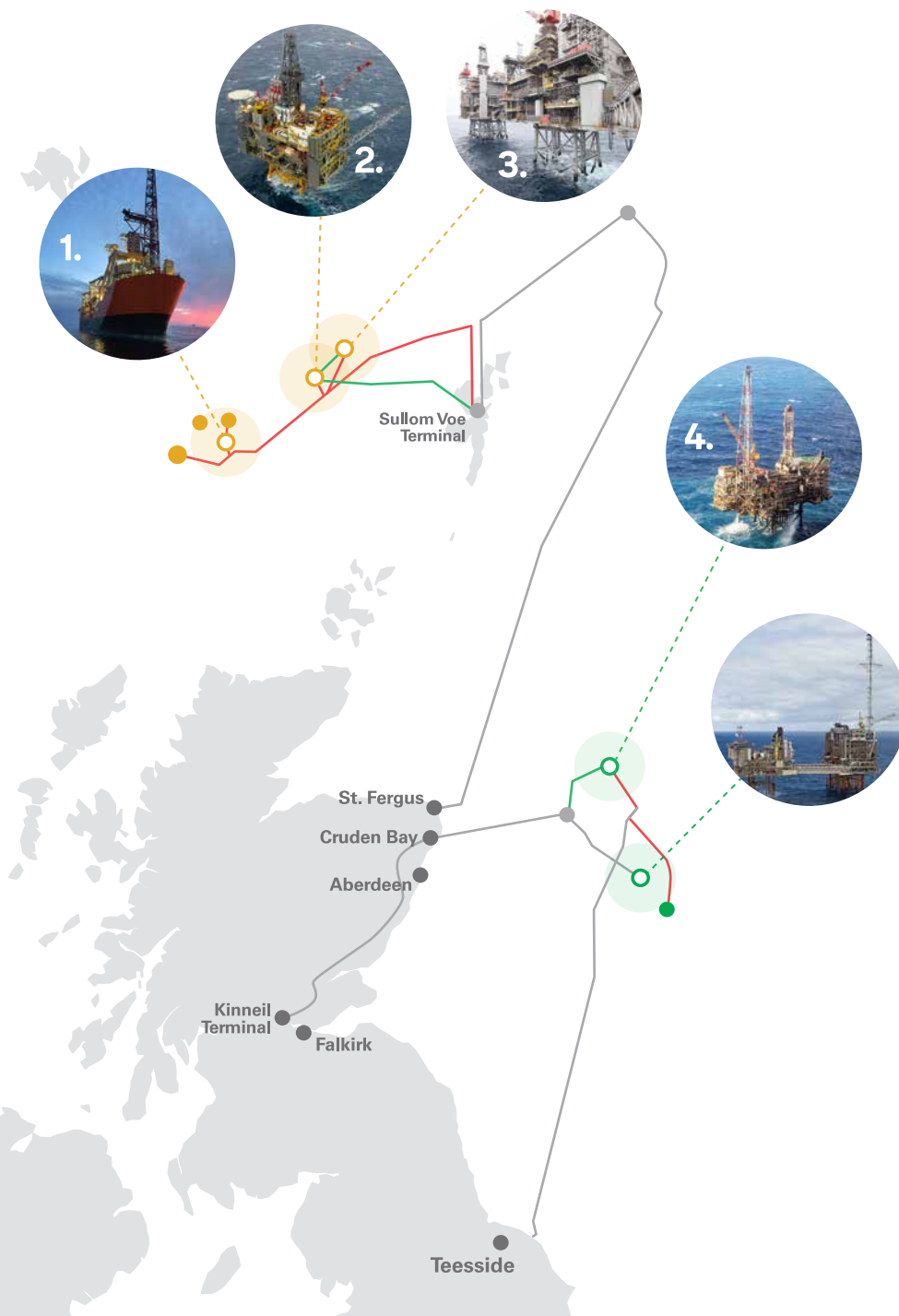
With an estimated seven billion barrels of oil in place, the Clair field is the largest oilfield on the UK Continental Shelf. The field, located 75 kilometres west of Shetland, was discovered in 1977, but challenging reservoir characteristics and the technological limits of the time meant it was the mid-1990s before the field saw extensive drilling, and 2001 before bp and partners approved a development plan. Production from the Clair field began in 2005 through the Clair Phase One platform, which was the first fixed platform west of Shetland.

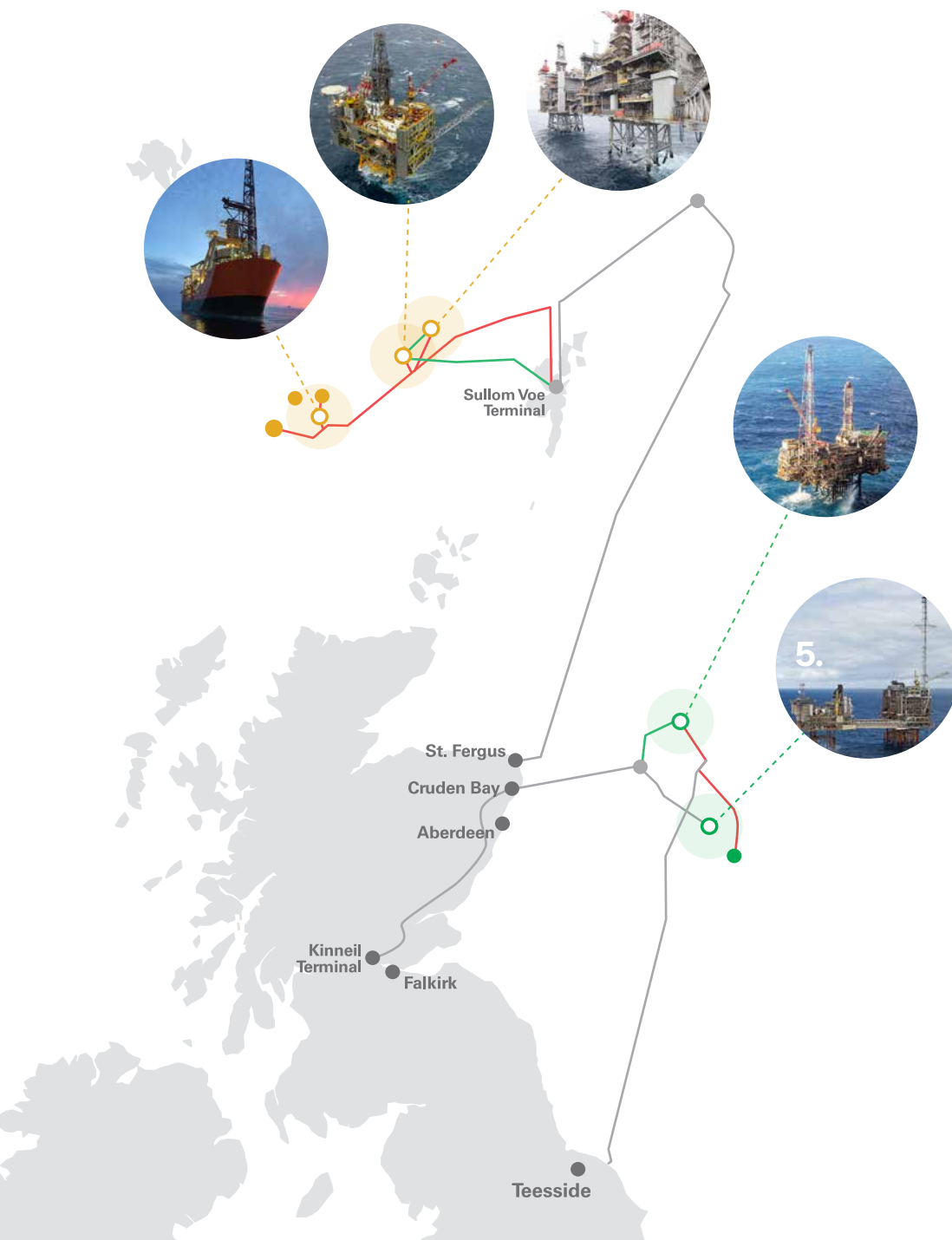
## 3. Clair Ridge

The size of the Clair field dictates development via a phased approach. Clair Ridge is the second phase of development. The bridge-linked platforms, which delivered first oil in November 2018, are designed to recover an estimated 640 million barrels of oil. bp and partners are considering options to unlock future energy potential from the Clair field.

## 4. Andrew

The Andrew area includes the Andrew, Arundel, Cyrus, Farragon and Kinnoull fields, which all produce through the Andrew platform in the central North Sea. In 2024, bp safely and successfully removed the rig from the Andrew platform, in preparation for cessation of production and eventual decommissioning activity.





## 5. Eastern Trough Area Project (ETAP)

ETAP, in the central North Sea, ranks as one of the largest and most commercially complex oil and gas developments in the North Sea. It has multiple fields with varying ownership sharing a central processing facility (CPF).

bp operates all the fields connected to ETAP CPF via subsurface infrastructure, including; Machar, Madoes, Mirren, Monan, Marnock, Mungo Seagull and more recently Murlach, which began production in 2025.

A normally unattended installation (NUI) over Mungo stands around 20 kilometres east of the ETAP CPF.

## Foinaven (not operational)

The Foinaven field is located 190 kilometres west of Shetland in water depths of up to 500 meters. The Petrojarl Foinaven FPSO was safely removed from operations in 2022 and bp is now progressing plans for decommissioning of the Foinaven field.

## Non-operated interests

During 2025, bp held non-operated interests in the Ithaca Energy Vorlich field and the TotalEnergies Culzean field, both in the central North Sea.

# Environmental management

**The North Sea oil and gas sector operates under a strict environmental regulatory framework.**

Our operating management system, which incorporates our environmental management system, comprises an integrated set of processes and procedures designed to drive continuous improvement in regulatory compliance and environmental performance.

bp's North Sea operations were independently attested to the requirements of ISO 14001:2015 in September 2024.

**In 2025, we completed several activities in support of our North Sea environmental objectives, including:**

- Predicted Emissions Monitoring Systems (PEMS) for nitrogen oxides (NOx) were installed on ETAP, Clair Ridge and Glen Lyon to support Pollution Prevention and Control permit compliance for large combustion plant, complementing the existing Methane PEMS.
- All in-scope North Sea assets reported at Oil & Gas Methane Partnership (OGMP) Level 5, demonstrating reconciliation between top down aerial methane monitoring and bottom up, source-level measurements.
- Thermal cuttings cleaning continued to be utilised for mobile drilling operations, where possible, reducing skip lifts, vessel emissions associated with onshore transport, and the volume of solids sent to landfill.
- bp's long-term Environmental Monitoring Strategy for the UKCS has been updated.
- Supporting a deep-sea coral re-homing project, transferring samples from UKCS platform legs onto purpose-built artificial reefs deployed within the Schiehallion field area.
- Completion of phase 2 of the deep-sea sponge survey in the Faroe-Shetland Sponge Belt Marine Protected Area, including retrieval of in-situ monitoring landers and DNA sampling.
- Continued support for INSITE Phase 3, a European-wide independent scientific programme assessing the impact of man-made structures on the North Sea marine ecosystem.
- Continued support for River Dee Trust volunteering programmes, including invasive species removal, tree tube removal, smolt trap data collection, and tree planting along the River Muick, alongside ongoing contribution to the 'Save the Spring' campaign.

## 2025 North Sea environmental objectives

| Area                                                           | Objective                                                                                                                            |
|----------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| <b>Compliance and conformance</b>                              | Maintain environmental regulatory compliance, and conformance to internal requirements to sustain bp's North Sea license to operate. |
| <b>Sustainability</b>                                          | Support implementation of the regional sustainability plan and delivery of identified / selected emissions reduction opportunities.  |
| <b>Development, efficiency &amp; enhancement opportunities</b> | Improve efficiency of environmental and social delivery                                                                              |

# Releases to the marine environment

bp seeks to prevent unpermitted releases to the environment. Where such releases occur, they are monitored, recorded and investigated, with the aim of preventing recurrence. All releases to the marine environment are reported to the regulator, OPRED.

In 2025, a total of 51 unplanned releases from offshore operations in the North Sea were reported to the regulator (Figure 1). Of these, 23 were chemical releases and 28 were hydrocarbons, with a combined total of 14 tonnes released to the marine environment. Two spills exceeded 1 tonne and accounted for 84% of the total mass released during the year.

## Details of these are as follows:

- A chemical release over time from a calibration pot inlet valve. The investigation has been completed, with preventative actions identified and planned for implementation during 2026.
- A subsea hydraulic fluid release from a test diverter valve actuator. A mechanical override has now been installed on the actuator to prevent recurrence.

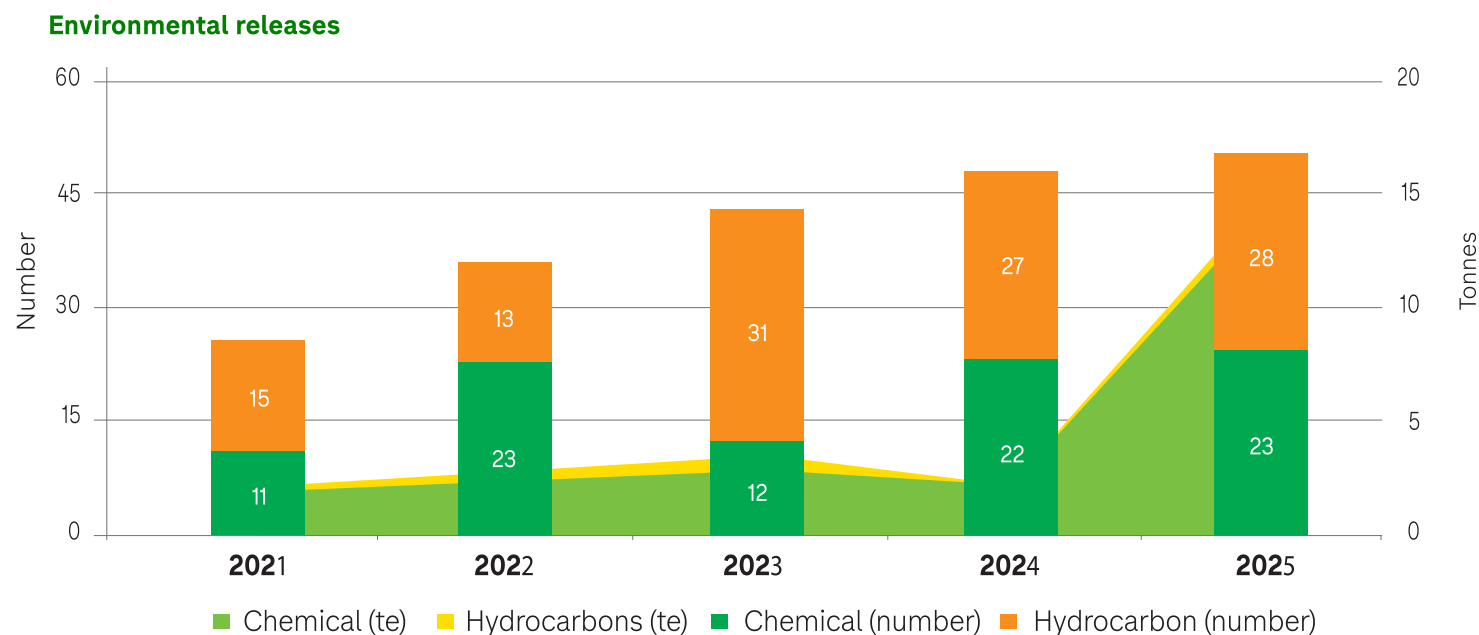


Figure 1: Total number of unpermitted releases between 2021 and 2025.

# Atmospheric emissions

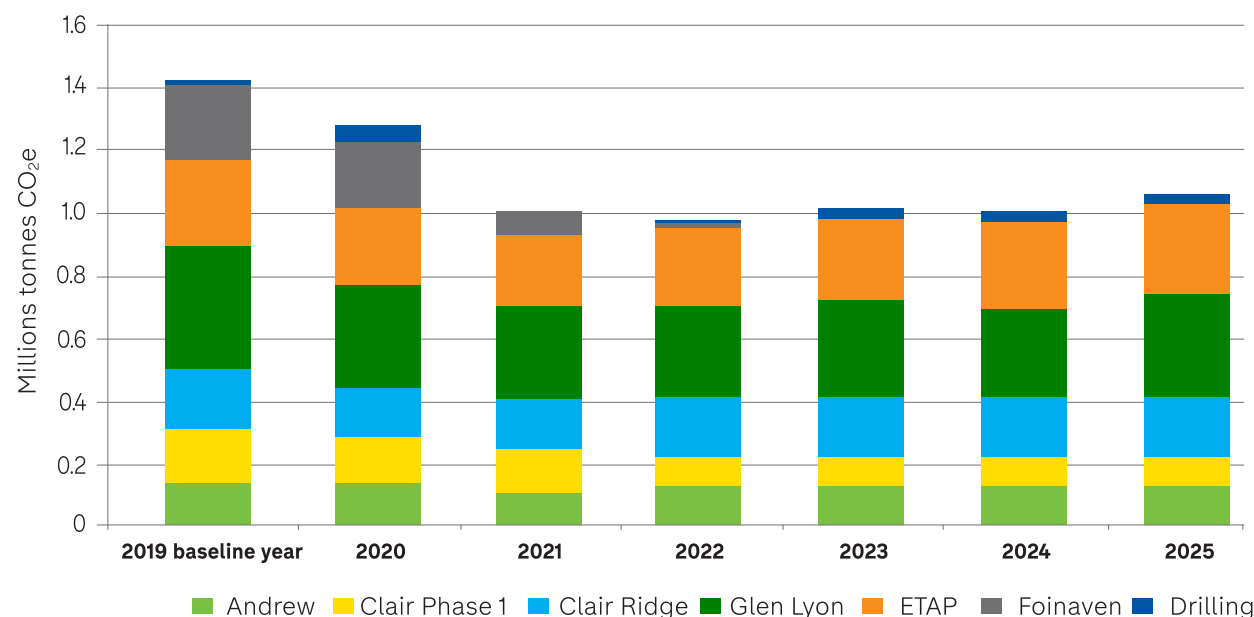
Atmospheric emissions arise from operations primarily through the combustion of fuel gas for power generation, as well as through flaring and venting. These emissions are tracked and reported in accordance with regulatory and bp requirements. We manage emissions by optimising plant efficiency and deploying technologies such as flare gas recovery systems (where feasible), and we actively seek ways to minimise our operational emissions.

## Net Zero Operations

Our aim is to reach net zero by 2050 or sooner for Scope 1 and 2 emissions within bp's operational control (on a CO<sub>2</sub>e basis), including by maintaining near-zero methane intensity<sup>1</sup> across our operated producing assets, enabled by supportive government policies.

The bp North Sea region achieved a 26% reduction in Scope 1 emissions by the end of 2025 compared with the 2019 baseline (Figure 2), reflecting sustained progress in emissions reduction across the portfolio. Although emissions were slightly higher than in 2024, this increase was aligned with higher production levels, demonstrating continued focus on reducing emissions intensity (15.71 te CO<sub>2</sub>e te/kboe in 2025, 11% lower than 2024) while maintaining operational performance.

### Greenhouse gas emissions



<sup>1</sup> Both the Oil & Gas Decarbonization Charter and the United Nations Environment Programme suggest below 0.20% as the threshold for 'near-zero' methane intensity. By reference to either of these thresholds, our 2025 methane intensity can be considered to be near zero.

Figure 2: Total greenhouse gas emissions between 2019 and 2025.



## Flaring

Flaring is an integral part of offshore installation design and is essential for maintaining safe operations. bp remains on track to reach zero routine flaring by 2030 across our operated oil assets, in line with our aim under the World Bank's Zero Routine Flaring initiative.

In 2025, less than 32,000 tonnes of gas were flared (Figure 3), representing a 74% reduction against the 2019 North Sea baseline. This significant reduction has been achieved through the implementation of flare gas and vapour recovery projects, improved compression train reliability, reduced well temperatures, optimisation of shutdown and start-up processes and portfolio optimisation.

### Total production gas flared

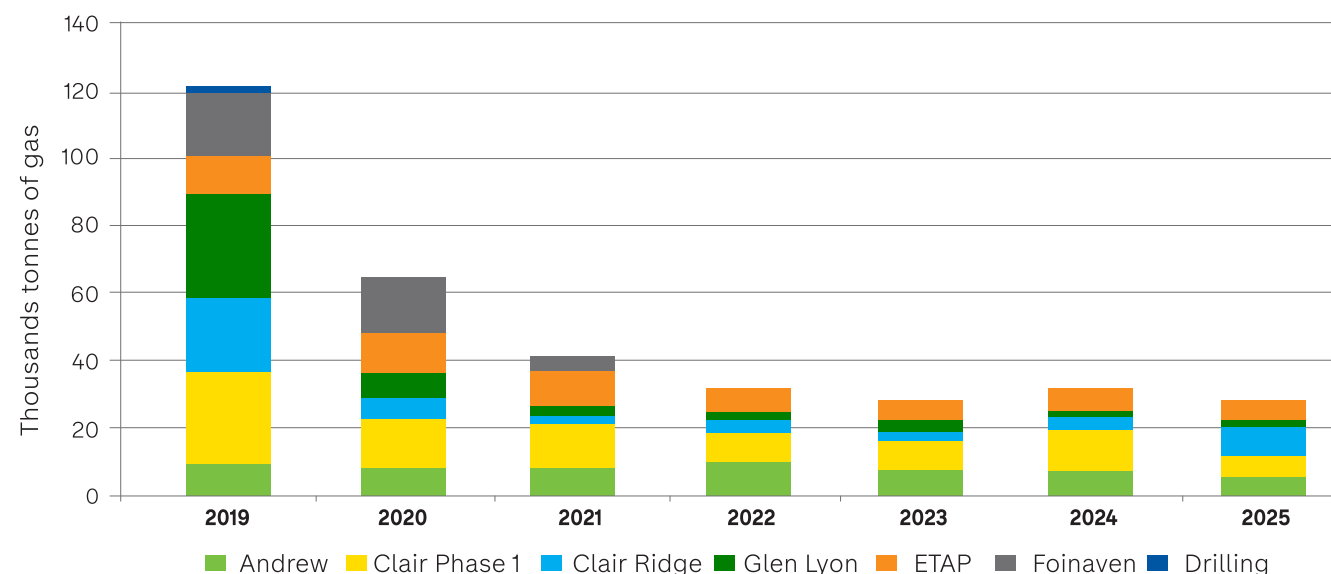


Figure 3: Total production gas flared between 2019 and 2025.

Sustainability in action: in 2025, Glen Lyon implemented operational changes to eliminate flaring during flare gas recovery compressor changeovers, avoiding approximately 800 kg of gas being flared each time.

## Methane

Methane emissions in oil and gas operations arise predominantly from sources such as fugitive emissions<sup>2</sup>, venting<sup>3</sup> and incomplete combustion, where methane is released as a by product of flared gas and fuel gas used for power generation. Historically, methane emissions have primarily been estimated using calculation-based methodologies rather than direct measurement.

In 2024, bp introduced real-time methane emissions monitoring across its North Sea operations (methane PEMS for turbines and Flare IQ), with this approach continuing throughout 2025. Results indicate that methane emissions are lower than those previously reported using the Environmental Emissions Monitoring System (EEMS) methodology. Work is ongoing to incorporate these site-specific measurements into regulatory reports, to ensure these are reflective of actual performance.

bp has also continued its programme of drone-based methane surveys across North Sea assets to validate reported bottom-up emissions. These surveys provide total site-level emissions data, which is compared with source-level measurements to confirm that all material methane sources are captured. This integrated measurement approach supports continuous improvement and strengthens confidence among regulators and stakeholders in the accuracy and transparency of reported methane emissions.

<sup>2</sup> Fugitive emissions typically occur at very low activity levels but carry a much higher emissions factor compared, for example, to fuel or flare gas.

<sup>3</sup> Venting refers to the routing of hydrocarbon gas to an unignited flare tip (also called cold flaring) or direct escape to atmosphere from process equipment (i.e. from storage tanks).

# Carbon performance management

bp has established a carbon performance management framework to support progress towards net zero operations. The framework underpins decision-making related to greenhouse gas (GHG) emissions, identifies opportunities for improvement, and drives alignment on emissions performance within day-to-day production management. This comprises three key processes:

1. **Installed emissions capacity**
2. **Emissions forecasting**
3. **Carbon bridge**

## Installed emissions capacity (IEC)

Installed emissions capacity (IEC) defines the lowest achievable level of absolute emissions under optimal operating conditions using existing resources. It establishes CO<sub>2</sub> targets aligned to production demand, with emissions from flaring and venting based on minimum design volumes. Performance is tracked against IEC to identify and address drivers of higher-than-expected emissions, supporting continuous improvement in emissions efficiency.

## Forecasting

GHG emissions forecasting is based on a standardised bottom-up approach applied across the North Sea portfolio. By integrating production plans with expected energy demand and flaring activity, assets generate more accurate and consistent emissions forecasts to support planning and performance management.

## Carbon bridge

The carbon bridge provides a consolidated view of carbon performance across bp's North Sea operations, comparing actual emissions against forecast. It is used to inform decision-making, highlight variances, and support structured discussions on emissions management and reduction opportunities.



# Produced water

Produced water is a by-product of offshore oil and gas production, generated during the separation of well fluids into hydrocarbons and water. Hydrocarbons are processed for export, while produced water, containing trace amounts of residual hydrocarbons, is managed through reinjection into the reservoir or discharge to sea in line with installation design and permit requirements.

bp prioritises the minimisation of oil discharges to the marine environment by reinjecting produced water into reservoirs wherever practicable. In 2025, 78% of the total water produced across bp's North Sea installations was reinjected (Figure 4).

## Produced water

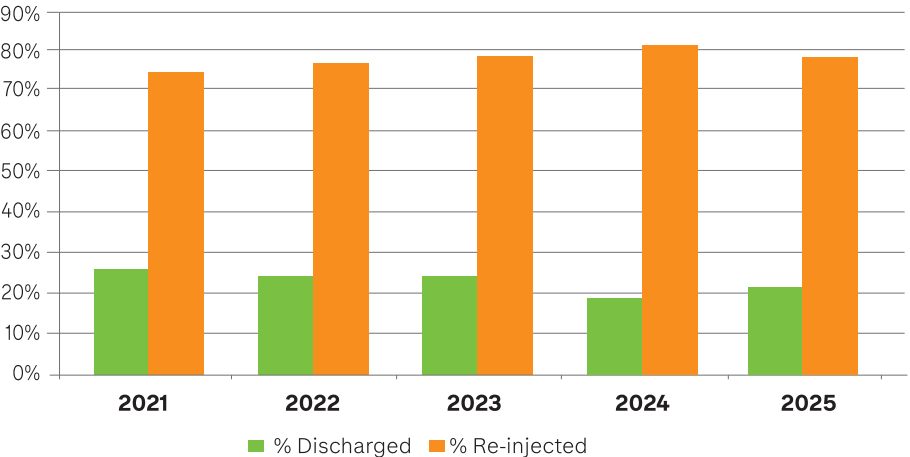


Figure 4: Total produced water reinjected and discharged ratio between 2021 and 2025.

Our North Sea installations' annual average concentration of oil discharged with produced water remained below the permitted limit of 30 mg/l (milligrams per litre) in 2025 (Figure 5). While two of the four discharging installations recorded a slight increase in average concentration, the overall annual weighted average remained below 20 mg/l. ETAP is not included, as it reinjects 100% of its produced water.

## Average oil concentration in produced water

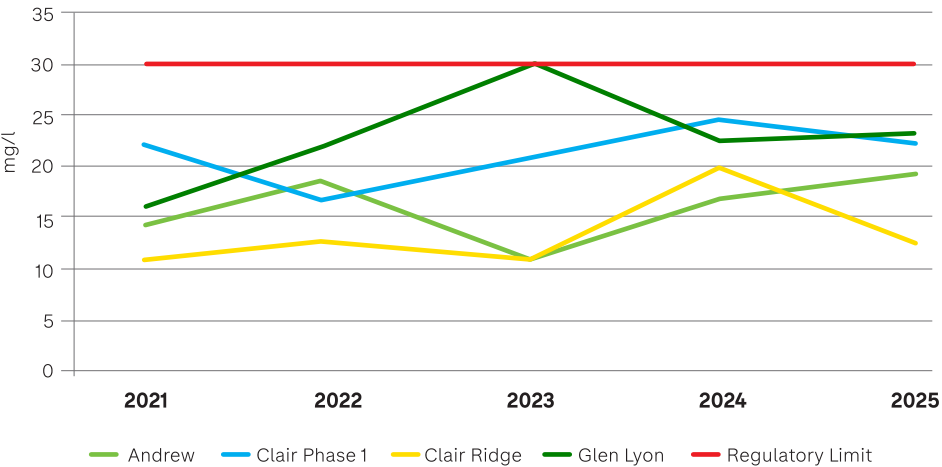


Figure 5: Annual average oil in produced water discharged to the marine environment between 2021 and 2025.

The increase in total mass of oil discharged with produced water in 2025 was primarily due to a planned produced water reinjection outage on Glen Lyon and improved operational uptime at Andrew (Figure 6).

## Total oil discharged in Produced water

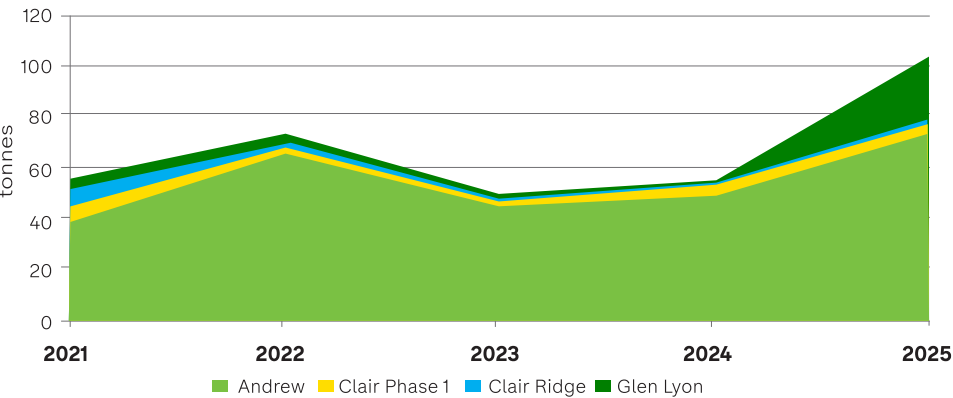


Figure 6: Total oil discharged in produced water between 2021 and 2025.

# Chemicals

Chemicals are used in offshore operations to support fluid flow, enable separation processes, prevent equipment degradation and fouling, and maintain control systems. Subsea operations also require chemicals for pipeline and infrastructure flushing to remove hydrocarbons prior to maintenance and inspection activities.

All chemical use and discharge is subject to regulatory permitting and control (Figure 7).

Of the chemicals discharged from bp production and subsea operations in 2025, 57% were classified as PLONOR (posing little or no risk to the marine environment), while 19% were identified with substitution warnings (SUB<sup>4</sup>) or other regulatory warning classifications (Figure 8).

Chemical discharges at Glen Lyon are higher than at other installations, reflecting the nature and complexity of its subsea tieback operations.

Production and subseas chemicals used

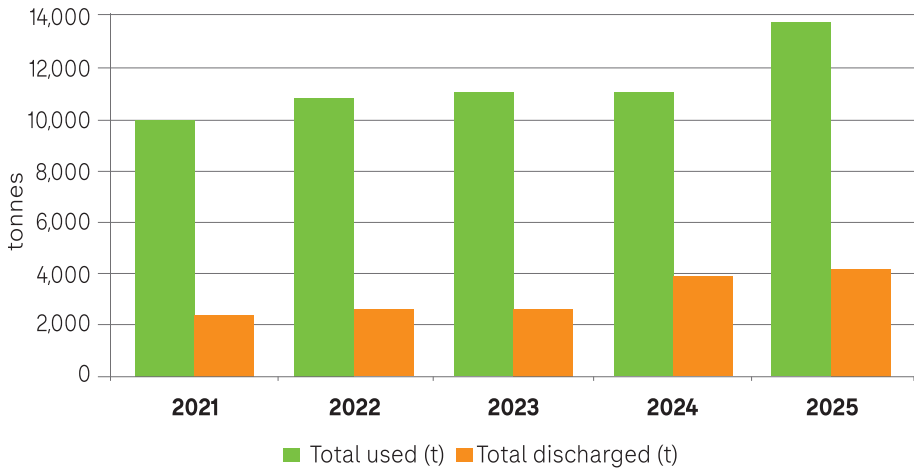


Figure 7: Total permitted production and subsea chemical use and discharge between 2021 and 2025.

Chemicals discharged

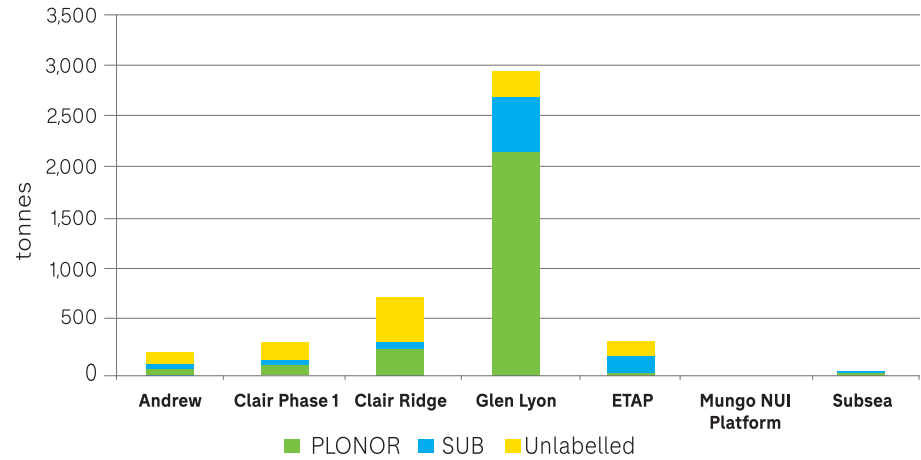


Figure 8: Total permitted production chemicals discharged during 2025.

<sup>4</sup> Offshore operations in the UK are required to comply with the OSPAR harmonized pre-screening scheme and REACH recommendation to replace chemical substances identified as candidates for substitution (SUB). Substances are flagged with a substitution warning based on their toxicity, bioaccumulation, and biodegradability.

# Operational waste

bp adopts a lifecycle approach to waste management, focused on avoiding and reducing waste generation, while maximising opportunities for reuse and material recovery. Efforts continue to prioritise diversion of waste from disposal towards recovery and recycling.

Waste generated by offshore production installations is transported to shore for treatment and disposal. In 2025, 66% of offshore waste was reused, recycled or utilised as feedstock for energy generation, with only 1% sent to landfill (Figure 9). Further detail on drilling waste management is provided in Section 9.

Treated waste comprises waste liquids and sludges, including those generated from tank cleaning activities. These wastes are processed through physical and chemical treatment to remove contaminants before being discharged to sewer under appropriate consents.

“Circularity in action: Our waste contractor established a reuse pathway for 15 tonnes of glass bubbles that would otherwise have been sent to landfill. The material was repurposed by another company for use as surface blasting media, reducing landfill waste and supporting circularity.”

Total Operational waste (tonnes/year)

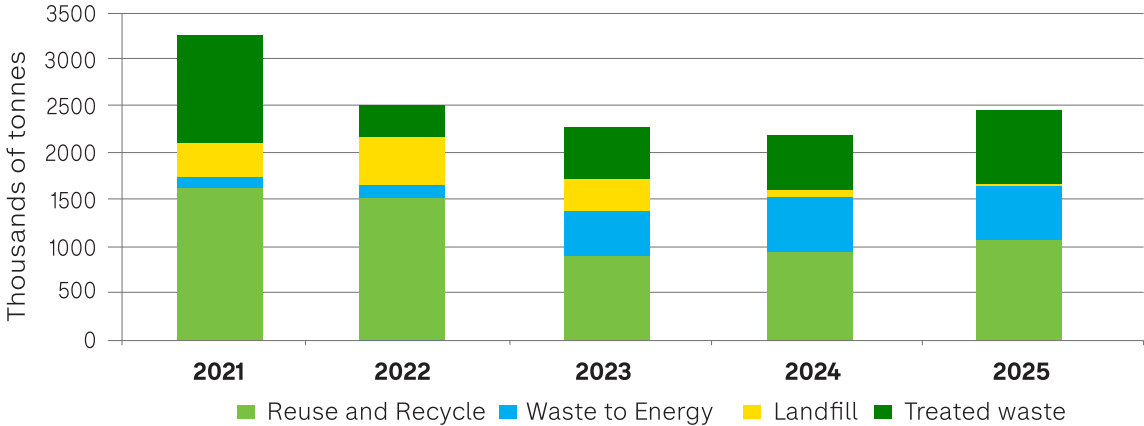


Figure 9: Total waste reported during 2025.

Special waste (tonnes/year)

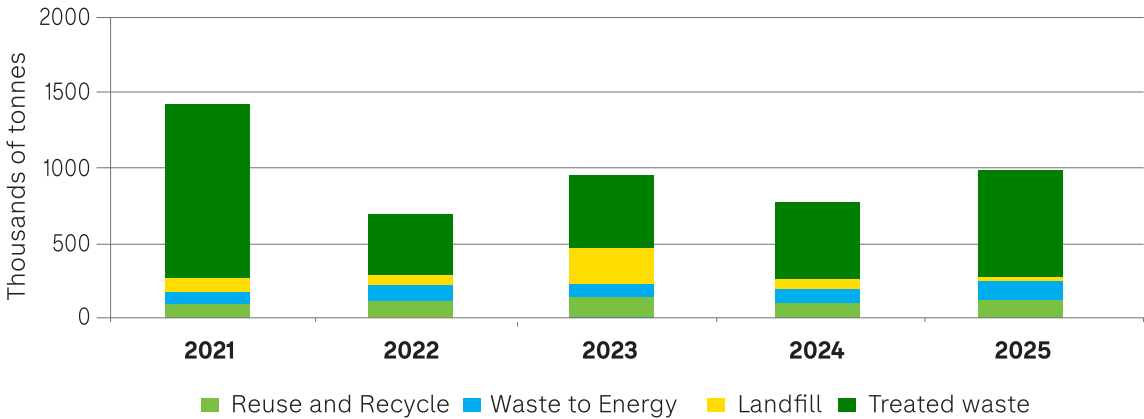


Figure 10: Special waste reported between 2021 and 2025.

Special waste includes materials such as paints, hazardous chemicals, oils, batteries, aerosols, heavy metals, wax from pigging operations, and oily waste. Non-special waste comprises segregated recyclables (including paper, packaging and wood), general waste (such as accommodation waste), and uncontaminated scrap metal.

Figures 10 and 11 present the quantities of special and non-special waste generated by bp-operated installations.

Non-special waste (tonnes/year)

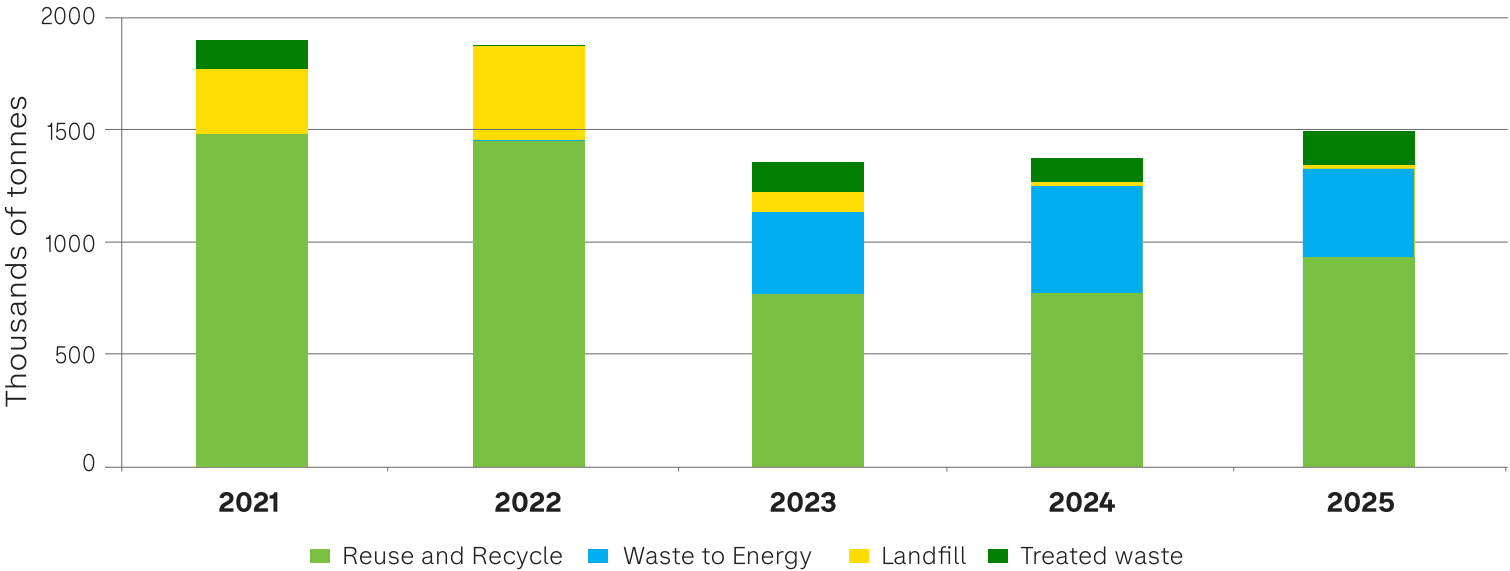


Figure 11: General waste reported between 2021 and 2025.

“ Sustainability in action: In 2025, bp completed the dismantling of the Andrew platform drilling derrick, ensuring that 793 tonnes of material were responsibly managed. Approximately 99% of materials were recycled or recovered for energy, with less than 1% sent to landfill, demonstrating a strong commitment to waste minimisation and circularity. ”



# Drilling and well intervention summary

Chemical usage and discharge from drilling and completion, plug and abandonment, and well intervention activities are presented in Figure 12. Of the total chemicals discharged, 95% by weight were classified as PLONOR.

Cuttings generated from drilling activities using water-based mud were discharged to the marine environment in accordance with regulatory permits. Cuttings from sections drilled with oil-based mud are not permitted to be discharged directly into the marine environment. These were either reinjected, returned to shore or thermally treated to separate the oil phase from solids, enabling the discharge of treated cuttings to sea and reducing the volume of waste requiring transport to shore and disposal to landfill.

Drilling cuttings and chemicals

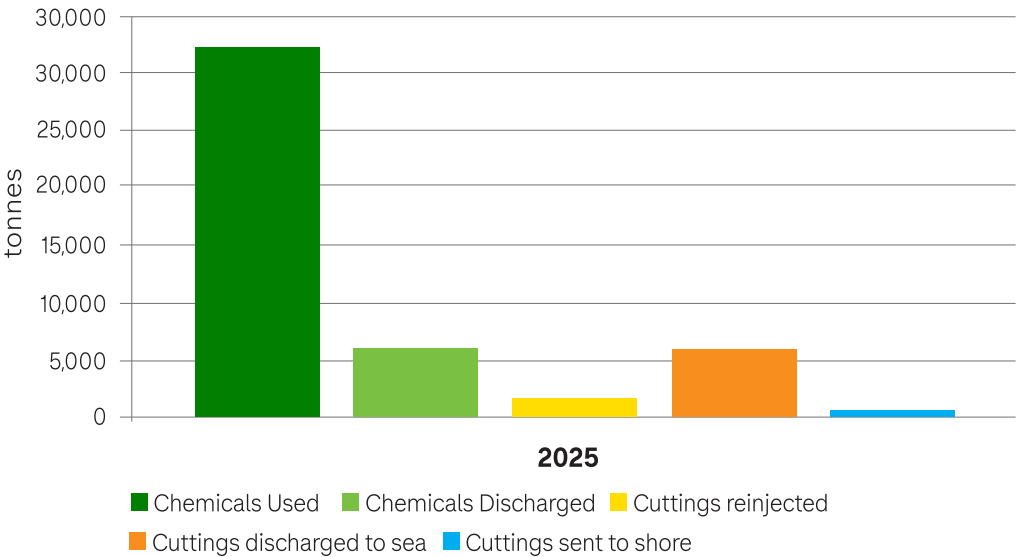


Figure 12: Drill cuttings (reinjected, discharged and disposed to landfill) and drilling chemicals used and discharged in 2025.

MODU waste

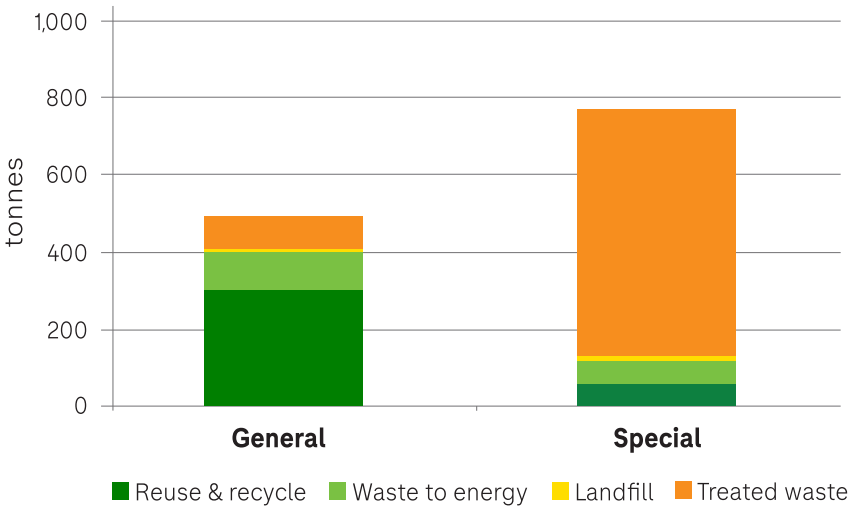


Figure 13: Total waste from MODU operations reported in 2025.

# bp North Sea UK HSE Policy



Nothing is more important to bp than the health, safety and security of our workforce and the communities and environment in which we operate. Our HSE goals are **no accidents, no harm to people** and **no damage to the environment**.

The BPEOC Board and North Sea Business Leadership Team (BLT) will ensure that we:

## Leadership & Culture

- Meet our legal and regulatory requirements.
- Manage the major accident hazards at our sites in accordance with our Corporate Major Accident Prevention Policy (CMAPP) and offshore safety cases.
- Operate our business in accordance with the requirements of our Operating Management System (OMS).
- Promote a positive safety culture built on our beliefs in 'Who we are' and aligned with our Safety Leadership Principles.
- Engage our workforce to create an environment in which they are informed, involved and enabled to do their jobs.
- Consult and co-operate effectively with our stakeholders, including the competent authority, workers' representatives and other duty holders on matters of health and safety.

## Risk Assessment & Management

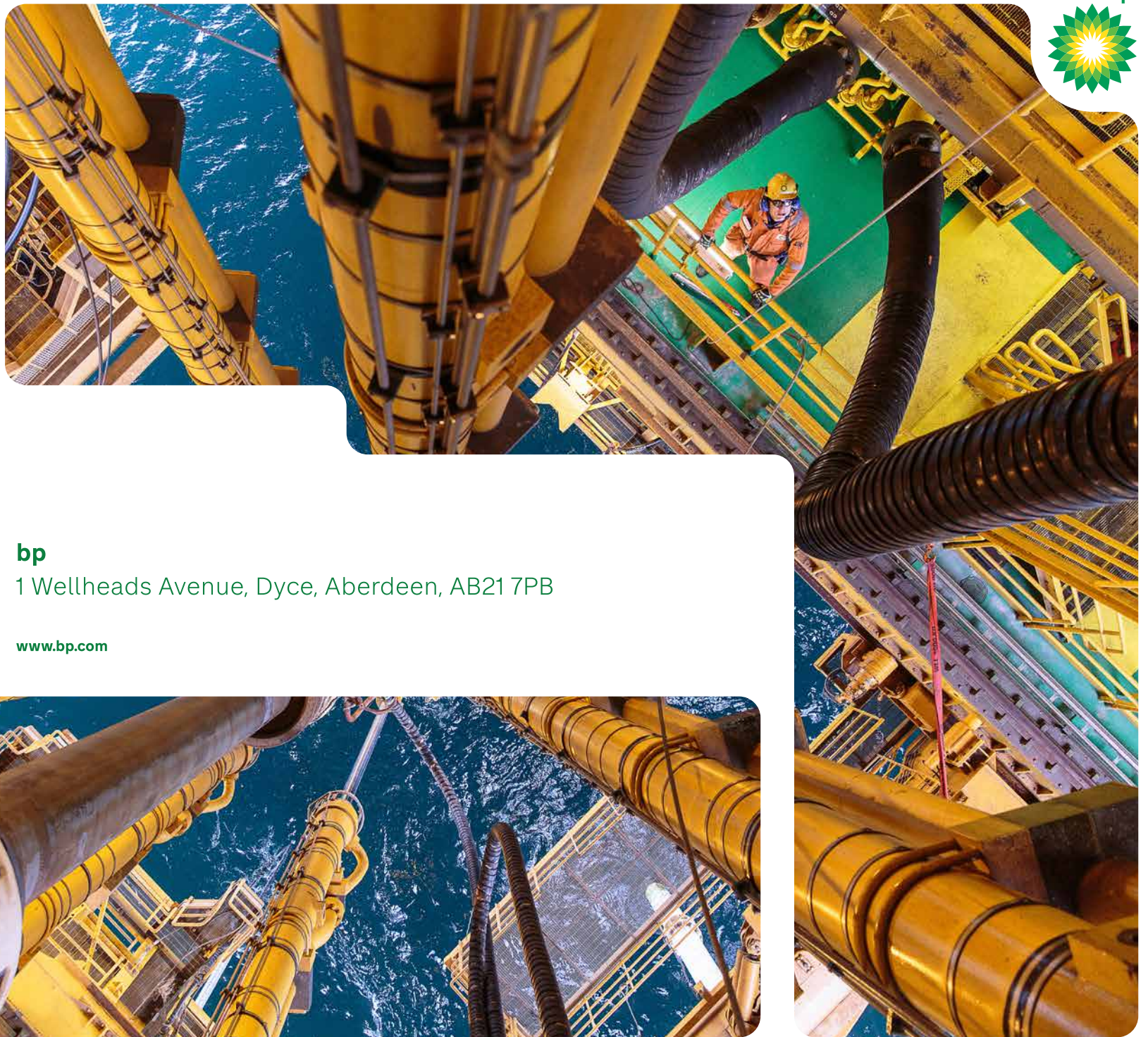
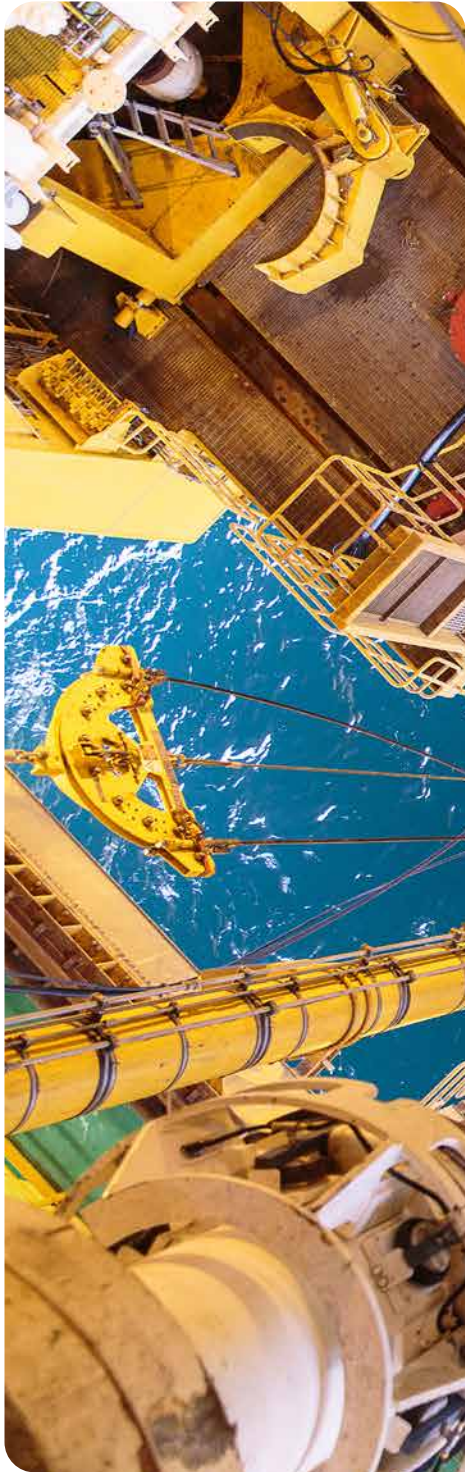
- Identify and assess our occupational, process safety and major accident hazard and environmental risks through established practices and processes.
- Provide a safe and healthy work environment for all employees, contractors, and visitors, with provision of well-designed, installed and maintained plant and equipment, and appropriate HSE information, instruction, training and supervision.
- Provide effective arrangements for the safe use, handling, storage and transport of articles and substances.
- Plan and prepare for potential emergencies.

## Risk Assessment & Management

- Identify opportunities to drive risk reduction and continuous improvement in our HSE performance through:
  - implementation of risk based self-verification programmes, and assurances and audits.
  - investigation of near misses and incidents.
  - proactive identification and application of industry good practice and cross industry sharing and learning.
- Set objectives and targets to focus on improvement in HSE performance.

**Doris Reiter**  
Director of BPEOC and North Sea SVP





bp

1 Wellheads Avenue, Dyce, Aberdeen, AB21 7PB

[www.bp.com](http://www.bp.com)