



## BW Offshore Catcher (UK) Ltd, 2025 Environmental Statement

This document is part of BW Offshore's Management System, which holds the complete revision history and electronic versions of attachments.

|                                         |                                             |
|-----------------------------------------|---------------------------------------------|
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## ABBREVIATIONS

|                 |                                                                                               |
|-----------------|-----------------------------------------------------------------------------------------------|
| CEFAS           | Centre for Environment, Fisheries and Aquaculture Science                                     |
| CH <sub>4</sub> | Methane                                                                                       |
| CHARM           | Chemical Hazard and Risk Management                                                           |
| CNS             | Central North Sea                                                                             |
| CO              | Carbon Monoxide                                                                               |
| CO <sub>2</sub> | Carbon Dioxide                                                                                |
| CRA             | Chemical Risk Assessment                                                                      |
| DESNZ           | Department for Energy Security and Net Zero (formerly BEIS)                                   |
| ESD             | Emergency Shutdown                                                                            |
| UK ETS          | United Kingdom Emissions Trading Scheme                                                       |
| FGL             | Fulmar Gas Line                                                                               |
| FPSO            | Floating Production Storage and Offloading Vessel                                             |
| FPV             | Floating Production Vessel                                                                    |
| HSE             | Health, Safety and Environment                                                                |
| HP              | High Pressure                                                                                 |
| ISO             | International Standards Organisation                                                          |
| LAT             | Lowest Astronomical Tide                                                                      |
| LP              | Low Pressure                                                                                  |
| NC              | Non-Compliance                                                                                |
| NO <sub>x</sub> | Nitrogen Oxides                                                                               |
| OCNS            | Offshore Chemical Notification Scheme                                                         |
| OCR             | Offshore Chemicals Regulations                                                                |
| ODP             | Oil Discharge Permit                                                                          |
| OPEPs           | Offshore Pollution Emergency Plans                                                            |
| OPRED           | Offshore Petroleum Regulator for Environment & Decommissioning                                |
| OIW             | Oil in Water                                                                                  |
| OSPAR           | Oslo Paris Convention for the Protection of the Marine Environment of the North-East Atlantic |
| PDN             | Permitted Discharge Notification                                                              |
| PLONOR          | Poses Little or No Risk                                                                       |
| PON             | Petroleum Operations Notice                                                                   |
| PPC             | Pollution, Prevention and Control                                                             |
| SEGAL           | Shell Esso Gas and Associated Liquids                                                         |
| SEMS            | Safety and Environmental Management System                                                    |
| SO <sub>x</sub> | Sulphur Oxides                                                                                |
| STP             | Submerged Turret Production                                                                   |



|      |                                  |
|------|----------------------------------|
| SUB  | Chemicals Rated for Substitution |
| UK   | United Kingdom                   |
| UKCS | United Kingdom Continental Shelf |
| VOC  | Volatile Organic Compounds       |



## 1 Introduction

### 1.1 Purpose

BW Offshore has one legal entity currently operating in the United Kingdom Continental Shelf (UKCS), BW Offshore Catcher (UK) Ltd, hereafter referred to as BWOCUK. BWOCUK is the Duty Holder / Operator of the BW Catcher Floating, Production, Storage and Offloading (FPSO) facility which is currently producing from the Catcher Area Fields (Harbour Energy are the licence holder for the Catcher Field Area).

Under Recommendation 2003/5 of the Oslo Paris Convention for the Protection of the Marine Environment of the North-East Atlantic (OSPAR), the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) requires that all companies operating in the UKCS have systems and procedures in place to identify, monitor and control the environmental aspects associated with offshore activities.

BW Offshore's worldwide operations are certified to the international environmental management system standard, ISO 14001. Recertification of the BW Offshore ISO 14001 environmental management system was concluded in December 2024.

Surveillance visits by the BW Offshore verifier are undertaken annually throughout the fleet.

The scope of this report includes all production activities undertaken by BWOCUK within the UKCS. The report is publicly available via the BW Offshore website.

## 2 Overview of Operations

The Catcher Area Development is located in Block 28/9 of the central North Sea (CNS) approximately 170 km southeast of Aberdeen and approximately 100 km from the UK/Norway median line in water depths of c. 85 m Lowest Astronomical Tide (LAT) (**Figure 2-1**).

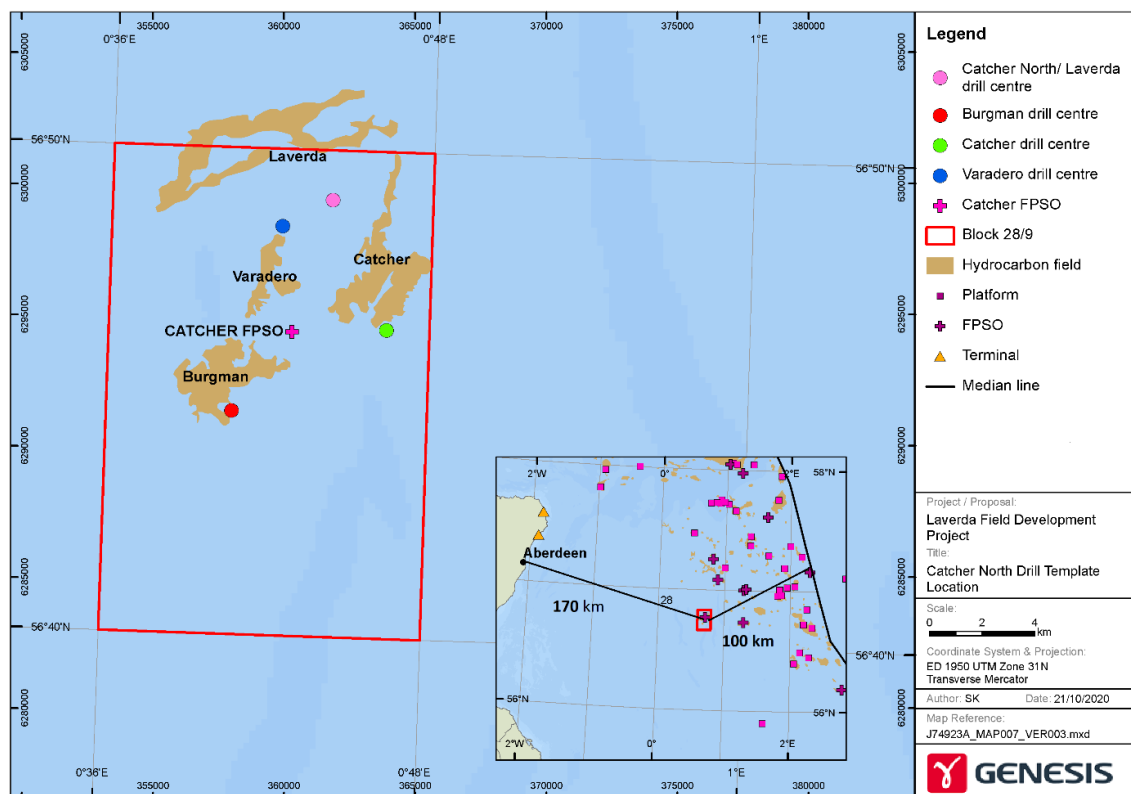
The BW Catcher FPSO has been contracted by Harbour Energy to produce from three fields: Catcher, Varadero and Burgman. The fields are tied back to the BW Catcher FPSO vessel located at c. 56°46'12.43" N and 00°42'46.93" E (WGS84) (Figure 2-1). The principal facilities include subsea facilities and a turret-moored and free weathervaning FPSO.

The FPSO is capable of processing up to 66,000 bbl of oil per day and has a maximum cargo storage capacity of 650,000 bbl. At maximum processing capacity, this results in crude oil offloading to a shuttle tanker approximately every 9–10 days.

Under current operating conditions, the Catcher FPSO is processing approximately 21,500 bbl of oil per day. At this production rate, crude oil is offloaded to a shuttle tanker approximately every 23 days.

When offloading cargo, tank blanketing will normally use low pressure (LP) fuel gas, with this gas being recovered via the flare gas recovery package during filling of the cargo tanks between offloads. Initially, produced gas will be used for power generation and gas lift, with excess being exported into the Shell Esso Gas and Associated Liquids (SEGAL) system (Fulmar Gas Line (FGL) to St Fergus gas pipeline).

In normal operations, BW Catcher flaring will be restricted to high pressure (HP) flare purge gas only. The LP flare system includes a Vapour Recovery Package to recover purges and vents sent to the LP flare system. The LP flare will be lit, as required, in process upset or ESD conditions only. Produced water will be treated and then either re-injected or discharged under an Oil Discharge Permit (ODP) issued by Offshore Petroleum Regulator for Environment and Decommissioning (OPRED).



**Figure 2-1: BW Catcher General Location Map**



An additional drill centre, Catcher North/ Laverda (CN/L), was installed during the same subsea campaign and has pipeline tiebacks to the Varadero Bundle. The Laverda production well was not deemed a commercial success and therefore was not commissioned. Catcher North and Burgman production wells were completed and commissioned in Q4 2022.



## 3 BW HSE Policy UK

BW Offshore is focused on protecting the environment in line with our stated commitment to reduce our impact to a level that is as low as reasonably practicable. This involves ongoing assessment, monitoring and reporting on environmental impacts.

The BW Offshore Management System (MS) exists to provide a systematic approach to the management of Health, Safety and Environment (HSE) issues in order to protect people and the environment and comply with UK legislation. The BW Offshore MS takes on the same purpose as a Safety and Environmental Management System (SEMS) as described within Safety Case Regulations.

BW Offshore considers that HSE have equal status with other primary business objectives and are of strategic importance. Safe working practices and due consideration of environmental impact are vital to the overall efficiency and continued success of the business. The Safety First Policy and the Environmental Policy serve as the foundation for MS. These policies are outlined below.

The Safety First Policy:

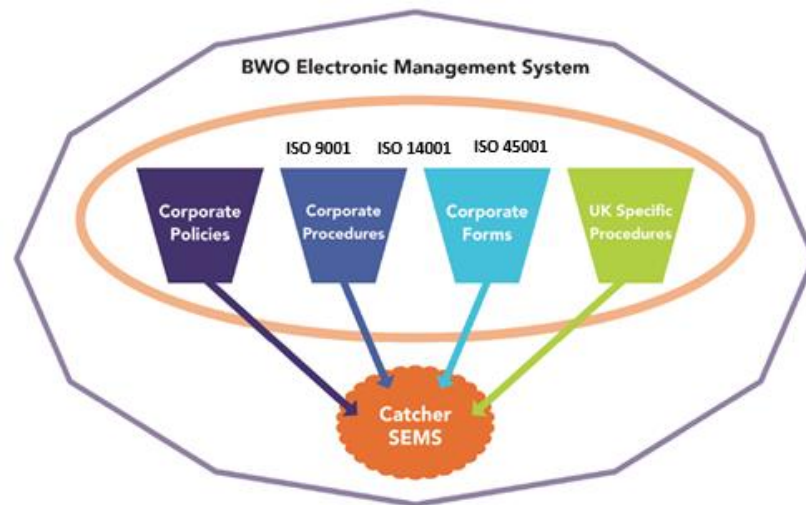
|                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
|------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Safety is at the core</b>                               | Safety is at the core of everything we do at BW Offshore. While we can recover from most adverse events in our business, the loss of life or serious harm is an unacceptable outcome for us. The health and wellbeing of our colleagues must therefore always come first.                                                                                                                                                        |
| <b>We Achieve Safety First with Our Shared Commitments</b> |                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>We LEAD with Integrity</b>                              | <p>We must LEAD with Integrity in all we do. We do this by:</p> <ul style="list-style-type: none"> <li>• Ensuring our Leadership's top priority is a commitment to safety.</li> <li>• Communicating and engaging our teams to work safely.</li> <li>• Demonstrating the behaviors needed to work safely.</li> <li>• Taking measures to support the health and wellbeing of our colleagues.</li> </ul>                            |
| <b>We manage our risks responsibly</b>                     | <p>We must manage our risks responsibly. We do this by:</p> <ul style="list-style-type: none"> <li>• Raising awareness and managing risks from hazards and threats present in operating our business.</li> <li>• Managing risks when changes occur to assets, processes and our organization.</li> <li>• Preparing for all foreseeable emergency situations.</li> <li>• Complying with all relevant HSSE regulations.</li> </ul> |
| <b>We control and perform our work with competence</b>     | <p>We must control and perform our work with competence. We do this by:</p> <ul style="list-style-type: none"> <li>• Ensuring we have the knowledge, skills and experience needed to perform our work.</li> <li>• Applying control of work to activities with potential safety risks.</li> </ul>                                                                                                                                 |
| <b>We engineer and operate safe assets</b>                 | <p>We must engineer and operate safe assets. We do this by:</p> <ul style="list-style-type: none"> <li>• Managing quality to achieve safe and efficient outcomes.</li> <li>• Managing safety critical work by following our standard operating practices.</li> <li>• Ensuring safety barriers effectively manage risks from major accident hazards.</li> </ul>                                                                   |
| <b>We always seek to learn and improve</b>                 | <p>We must always seek to learn and improve. We do this by:</p> <ul style="list-style-type: none"> <li>• Learning and taking action from safety incidents.</li> <li>• Closing gaps between work we perform and our work requirements.</li> <li>• Analyzing leading indicators of safety performance to drive continuous improvement.</li> </ul>                                                                                  |

## The Environmental Policy:

|                                                           |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|-----------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Environmental vision</b>                               | At BW Offshore, we aim to lead by example by committing to environmental protection and advancement of cleaner floating solutions to progress the future of energy.                                                                                                                                                                                                                                                                                                                                                               |
| <b>We achieve this through Our Shared Commitments</b>     |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>We champion environmental progress</b>                 | <p>We champion environmental progress, by engaging with Clients and industry partners to:</p> <ul style="list-style-type: none"> <li>• Promote emission reduction solutions and Best Available Techniques.</li> <li>• Identify and leverage opportunities to improve environmental performance.</li> <li>• Mandate rigorous standards for responsible environmental management.</li> </ul>                                                                                                                                        |
| <b>We operate with efficiency</b>                         | <p>We operate with efficiency to minimize our environmental impacts by:</p> <ul style="list-style-type: none"> <li>• Implementing robust controls and practices to: <ul style="list-style-type: none"> <li>○ Mitigate air emissions.</li> <li>○ Responsibly discharge effluent streams.</li> <li>○ Prevent release of hazardous materials during ship recycling.</li> <li>○ Reduce waste materials.</li> </ul> </li> <li>• Prioritizing efficiency and maintenance of equipment for optimal environmental performance.</li> </ul> |
| <b>We manage environmental risks responsibly</b>          | <p>We manage environmental risks responsibly by:</p> <ul style="list-style-type: none"> <li>• Identifying and controlling the risks of major environmental incidents.</li> <li>• Operating within safe limits to prevent accidental discharges to the environment.</li> <li>• Preparing for all foreseeable environmental emergencies.</li> </ul>                                                                                                                                                                                 |
| <b>We identify and comply with applicable regulations</b> | <p>We identify and comply with applicable environment regulations in the areas we operate by:</p> <ul style="list-style-type: none"> <li>• Continually evaluating our impacts and determining environmental compliance obligations within our control or influence.</li> <li>• Consistently meeting or exceeding our environmental obligations.</li> </ul>                                                                                                                                                                        |
| <b>We always seek to learn and improve</b>                | <p>Our commitment to learn and improve drives our efforts to:</p> <ul style="list-style-type: none"> <li>• Respond proactively and learn from environmental incidents.</li> <li>• Promote environmental awareness among employees, encouraging active participation in achieving our environmental targets.</li> <li>• Explore and invest in new ventures that drive advancement of sustainable floating energy solutions.</li> </ul>                                                                                             |

The MS meets the requirements of The Offshore Installations (Offshore Safety Directive) (Safety Case) Regulations 2015 and Offshore Installations (Safety Case) Regulations 2005, in particular the contents of Schedules 2 and 3.

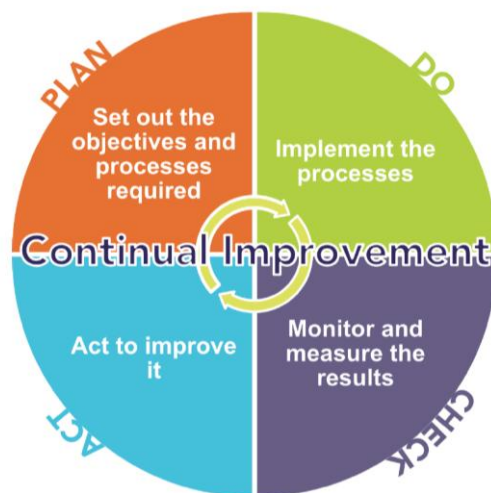
The SEMS requirements are met by using the existing processes and procedures contained within the BW Offshore Integrated Management System and supplementing with processes and procedures specific to the operations of BWOCUK in the UKCS (**Figure 3-1**).



**Figure 3-1: Inputs to BW Catcher MS.**

The purpose of the MS is to provide a framework for the management of all hazards and associated risks generated through the operation of the BW Catcher FPSO.

The basic principle applied within the MS is one of continual improvement in the management of risk, both environmental and health and safety related. In order to achieve this the MS utilises the Plan, Do, Check and Act model, as seen in (**Figure 3-2**).



**Figure 3-2: BW Catcher MS Continual Improvement Model.**

## 4 Environmental Performance

The environmental performance of the BW Catcher FPSO during 2025 is described in the following sub-sections.

### 4.1 Oil in Produced Water

During normal production, water is produced when extracting hydrocarbons from the reservoir.

Despite treatment, produced water still contains traces of oil, and as such, produced water discharge is controlled via a permitting system managed by the UK regulatory authority, OPRED.

The 2025 Oil Discharge Permit (OLP/570) held by BWOCUK allows the BW Catcher FPSO to discharge produced water, provided the hydrocarbon concentration is within the limit set out in the permit.

In 2025, the Catcher FPSO produced 5,731,501 m<sup>3</sup> of water of which, 99.9% was re-injected back into the reservoir. This equated to 401.85 tonnes of oil in produced water in total. Due to the high re-injection performance of Catcher in 2025 the majority of the oil in produced water was re-injected with only 0.008 tonnes of oil discharged to the environment.

The amount of produced water discharged in 2025 is outlined in **Table 4.1**.

**Table 4.1: Produced water discharge in 2025.**

| Month        | Produced water discharged (m <sup>3</sup> ) | Average OiW (mg/L) | Oil discharged (tonnes) |
|--------------|---------------------------------------------|--------------------|-------------------------|
| January      | 0.00                                        | 0.00               | 0.00000                 |
| February     | 144.30                                      | 28.83              | 0.00416                 |
| March        | 14.40                                       | 2.78               | 0.00004                 |
| April        | 0.00                                        | 0.00               | 0.00000                 |
| May          | 136.80                                      | 0.22               | 0.00003                 |
| June         | 14.40                                       | 65.97              | 0.00095                 |
| July         | 80.40                                       | 22.39              | 0.00180                 |
| August       | 0.00                                        | 0.00               | 0.00000                 |
| September    | 7.20                                        | 56.94              | 0.00041                 |
| October      | 0.00                                        | 0.00               | 0.00000                 |
| November     | 0.00                                        | 0.00               | 0.00000                 |
| December     | 7.20                                        | 69.44              | 0.000050                |
| <b>Total</b> | <b>404.70</b>                               | <b>-</b>           | <b>0.00789</b>          |

The average oil in water concentration is a weighted average, calculated by dividing the total oil mass discharged by the total discharged produced water volume.

BW Catcher FPSO was permitted to discharge a total of 319,502 m<sup>3</sup> of produced water during 2025 however the actual volume of produced water discharged to sea during 2025 was 404.7 m<sup>3</sup>.

BWOCUK utilises a produced water re-injection system which when online injects a portion or the full amount of the produced water back into the reservoir as opposed to discharging it overboard. As a result, only 0.008 tonnes of oil from produced water was discharged to the environment. This represents 0.1% of the total quantity of oil the Catcher FPSO was permitted to discharge in 2025.

**Table 4.2** overleaf outlines the amount of produced water re-injected during 2025.

**Table 4.2: Produced water re-injected in 2025.**

| Month        | Produced water re-injected (m <sup>3</sup> ) | Average OiW (mg/L) | Oil Re-injected (Tonnes) |
|--------------|----------------------------------------------|--------------------|--------------------------|
| January      | 510,591.20                                   | 80.04              | 40.87                    |
| February     | 424,644.00                                   | 78.24              | 33.22                    |
| March        | 492,649.00                                   | 75.16              | 37.03                    |
| April        | 491,097.10                                   | 73.97              | 36.32                    |
| May          | 603,771.10                                   | 80.19              | 48.42                    |
| June         | 497,247.00                                   | 69.75              | 34.68                    |
| July         | 398,362.30                                   | 65.22              | 25.98                    |
| August       | 223,100.10                                   | 57.24              | 12.77                    |
| September    | 491,507.40                                   | 64.26              | 31.58                    |
| October      | 537,601.50                                   | 59.46              | 31.97                    |
| November     | 530,002.60                                   | 66.62              | 35.31                    |
| December     | 530,522.60                                   | 63.52              | 33.70                    |
| <b>Total</b> | <b>5,731,095.90</b>                          | <b>-</b>           | <b>401.85</b>            |

## 4.2 Chemical Use and Discharge

Various chemicals are used offshore during production operations.

During production operations, chemicals such as scale dissolvers, corrosion inhibitors, demulsifiers and biocides are used to assist with the separation of oil and water, prevent damage to infrastructure such as pipelines, and to prevent 'souring' of the reservoir.

Any chemical used to process hydrocarbons offshore must, in line with the Offshore Chemical Regulations 2002 (as amended), be registered by the Centre for Environment, Fisheries and Aquatic Sciences (CEFAS). The chemicals are subject to robust environmental risk assessment and once registered, their use is controlled and monitored through a permit granted by OPRED.

Under the Offshore Chemical Notification Scheme (OCNS), chemicals are ranked according to the assessed hazard to the environment and are given a lettered heading E, D, C, B or A, with E representing the lowest and A the highest hazard category.

Using the Chemical Hazard and Risk Management (CHARM) model, a colouring band is used to show which chemicals pose the highest environmental hazard. These bands are Gold, Silver, White, Blue, Orange or Purple with Gold representing the lowest hazard and Purple the highest.

Some chemicals are regarded as PLONOR (PLO), which means that they have been determined to Pose Little Or NO Risk to the environment.

Any chemicals that carry substitution (SUB) warnings or which pose a risk to the marine environment (determined using criteria from OPRED) have been justified in the Chemical Risk Assessment (CRA) document that accompanies the production permit.

BW Offshore, its contractors and chemical suppliers work on a continuous basis to find suitable alternatives to replace the products with SUB warnings.

## 4.2.1 BW Catcher Chemical Use and Discharge 2025

Fifteen chemicals with substitution warnings (SUB) were permitted for use on BW Catcher in 2025, and these are detailed in **Table 4.3**: Chemicals with SUB warnings permitted in 2025.

**Table 4.3: Chemicals with SUB warnings permitted in 2025.**

| Chemical name    | Supplier                              | Status                 | Replacement status |
|------------------|---------------------------------------|------------------------|--------------------|
| AFMR20360A       | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| CORR11389A       | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| CORR12452A       | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| EMBR43442F1      | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| EMBR48301A       | ChampionX (Champion Technologies Ltd) | Used or discharged     | Not replaced       |
| EMBR17904F1      | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| FLOW40074F1      | ChampionX (Champion Technologies Ltd) | Not used or discharged | Not replaced       |
| FLOW48395F1      | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| IFE-WT-17        | Resman AS                             | Used and discharged    | Not replaced       |
| MEMB00589A       | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| NAPH23002A       | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| Oceanic HW443 R  | MacDermid Offshore Solutions          | Used and discharged    | Not replaced       |
| PARA12200A       | ChampionX (Champion Technologies Ltd) | Used and discharged    | Not replaced       |
| PHASETREAT 18862 | Clariant Oil Services UK Ltd          | Used or discharged     | Not replaced       |
| PHASETREAT 6173  | Clariant Oil Services UK Ltd          | Used and discharged    | Not replaced       |

A total of 35 chemicals were permitted for use, with 24 being used and discharged on BW Catcher during 2025. These uses are representative of chemical use quantities required to process hydrocarbons that are produced at BW Catcher.

2,896,764 kg of chemicals were used during 2025 and of that 164,169 kg was discharged during operations in 2025.

**Figure 4-1** shows the percentile usage of chemicals permitted during 2025. **Figure 4-2** shows the percentile discharge of chemicals during 2025.

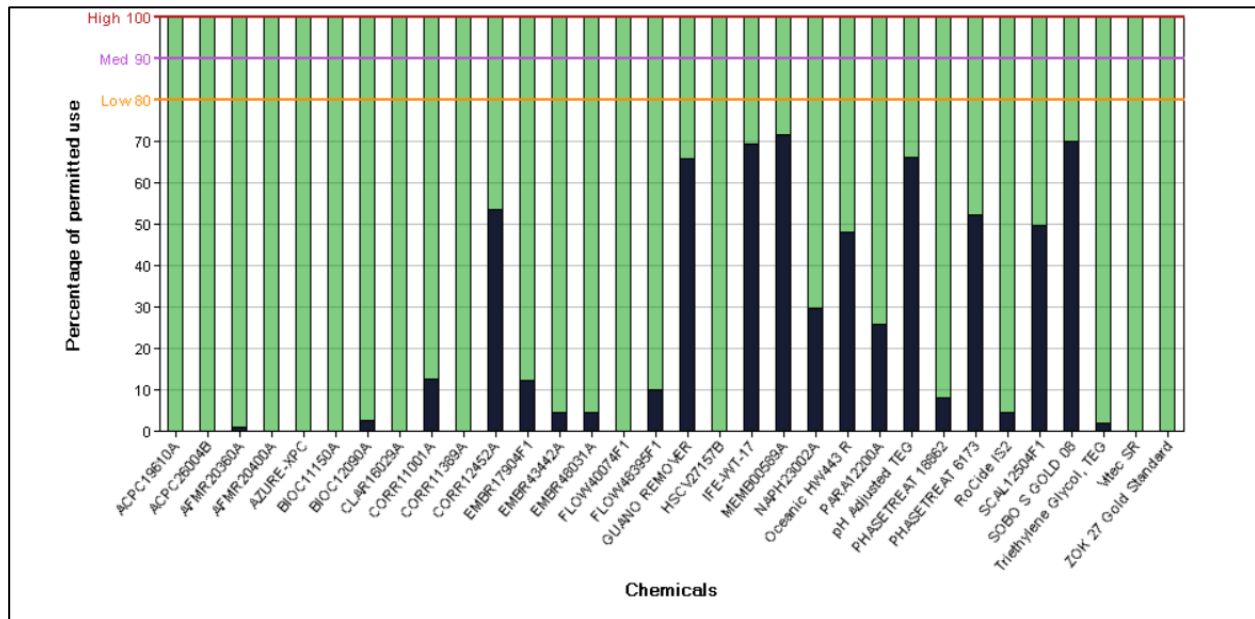


Figure 4-1: Percentile use of chemicals permitted and used during 2025.

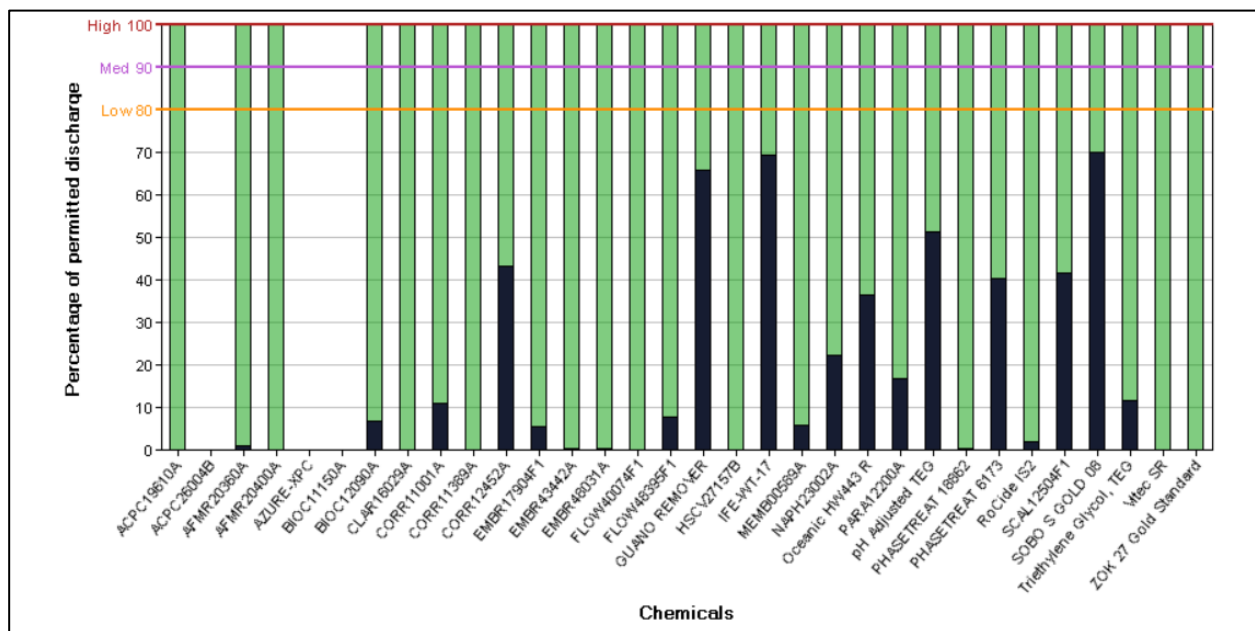


Figure 4-2: Percentile discharge of chemicals permitted and discharged during 2025.

## 4.3 Waste

Waste is generated from offshore operations and is transported onshore for re-use, recycling, treatment or disposal.

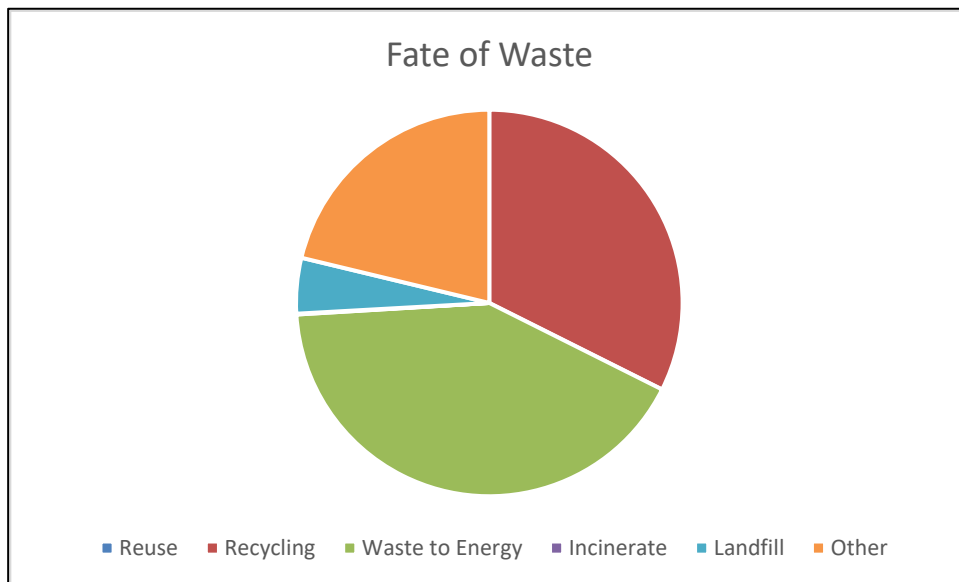
Production installation waste is segregated into categories before back-loading. As much waste as possible is sent for recycling. This includes wood, scrap metals, paper/cardboard, glass and plastics.

Waste that cannot be recycled is sent to landfill. Certain types of waste that are harmful to the environment (Special Waste) are sent ashore to be processed and disposed of by licensed handlers in accordance with the relevant legislation.

BW Offshore target areas where the amount of waste generated can be further reduced.

### 4.3.1 BW Catcher FPSO Waste 2025

A total of approximately 296.5 tonnes of waste was disposed of from the BW Catcher FPSO in 2025 via the waste management contract. Of the total waste produced, 32% was recycled, 42% was waste to energy, and 5% was landfilled. (**Figure 4-3**).



**Figure 4-3: BW Catcher fate of waste.**

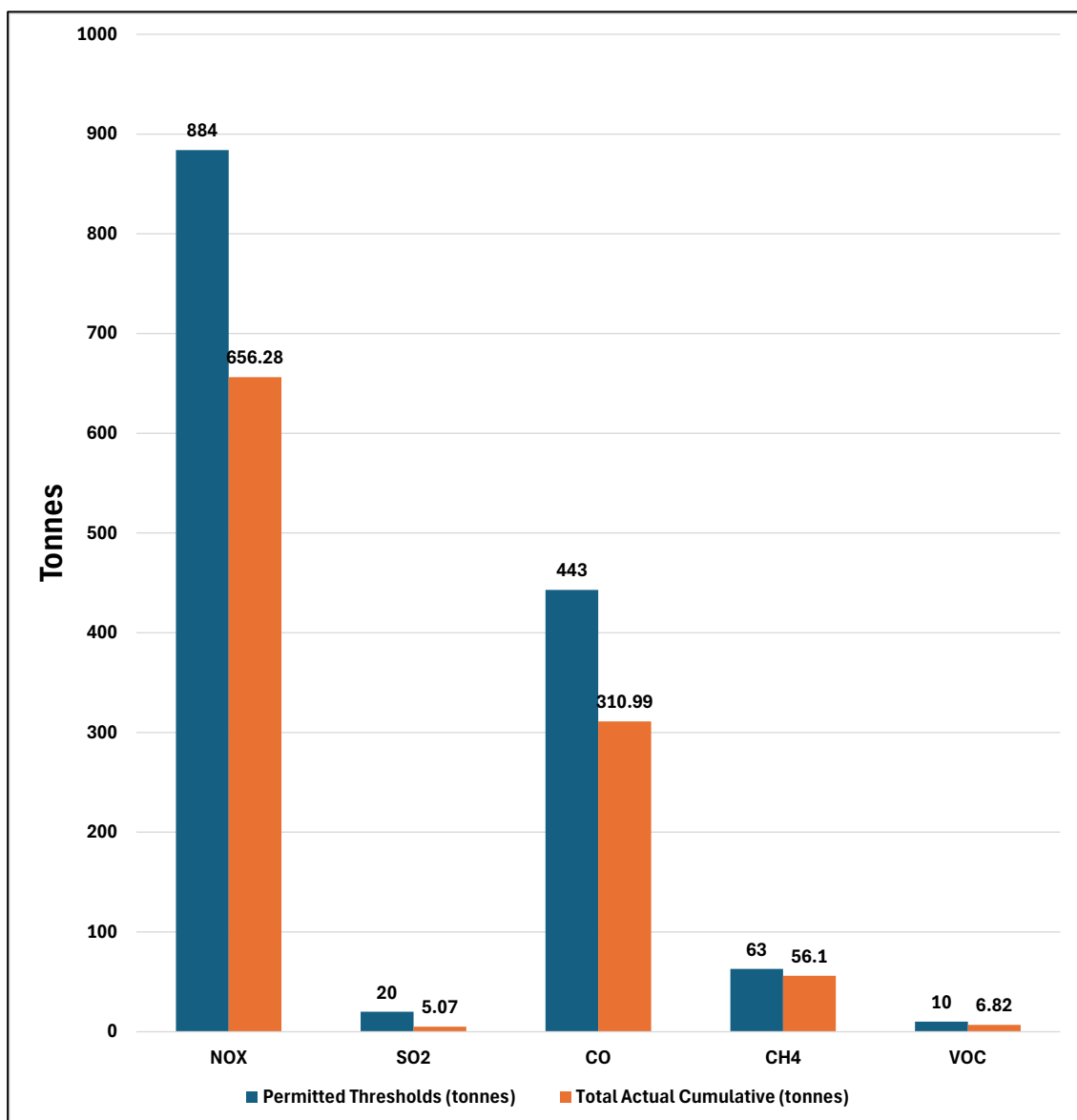
## 4.4 Atmospheric Emissions

Atmospheric emissions arise during offshore drilling and production operations predominantly as a result of fuel combustion for power generation and gas flaring activities.

### 4.4.1 BW Catcher Atmospheric Emissions 2025

The BW Catcher FPSO is regulated under the Pollution, Prevention and Control (PPC) Regulations as a medium combustion installation. As such, the installation has set limits on atmospheric emissions of nitrous oxides (NO<sub>x</sub>), sulphur oxides (SO<sub>x</sub>), carbon monoxide (CO), methane (CH<sub>4</sub>) and volatile organic compounds (VOCs).

**Figure 4-4** shows the combustion emissions (excluding CO<sub>2</sub>) for 2025. All emissions were within limits set by OPRED in the BW Catcher PPC Permit.

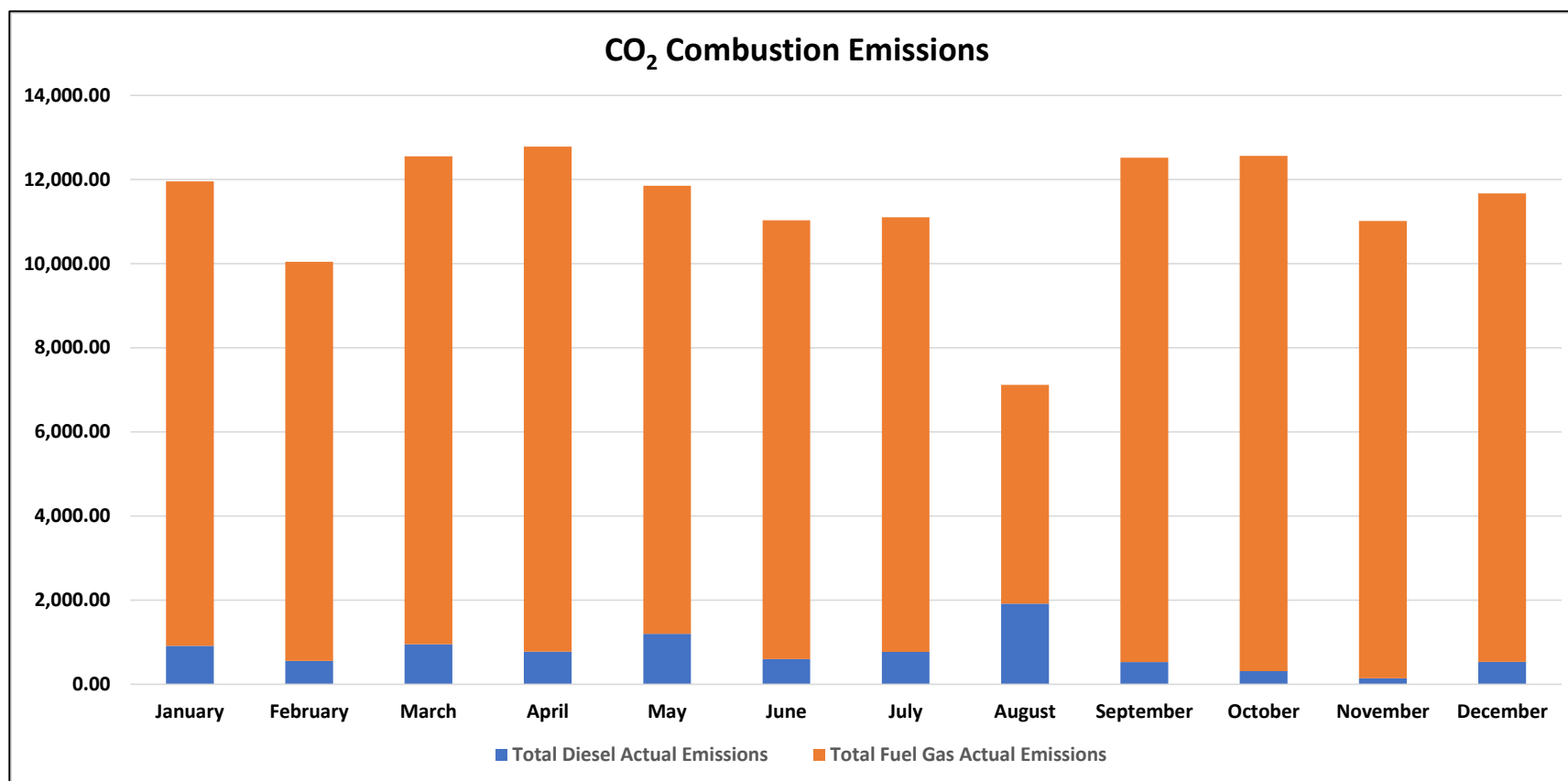


**Figure 4-4: BW Catcher Combustion Emissions.**

BW Catcher FPSO is also regulated under the United Kingdom Emission Trading Scheme (UK ETS) Regulations, which regulate CO<sub>2</sub> emissions for combustion sources, such as turbines and generators.

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During 2025, approximately 136,224 tonnes of CO<sub>2</sub> were emitted from combustion activities on BW Catcher FPSO. During normal operations, BW Catcher FPSO runs with two turbines on and as can be seen in Figure 4-5 the primary source of fuel is from fuel gas (all produced gas would be used as fuel with excess gas being exported), however the turbines can also run on diesel.



**Figure 4-5: BW Catcher CO<sub>2</sub> combustion emissions.**

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### 4.4.2 Flaring

The cumulative flaring amount for 2025 was 3,897.7 tonnes, which is below the permitted amount of 5,579 tonnes. This is displayed in **Figure 4-6**.

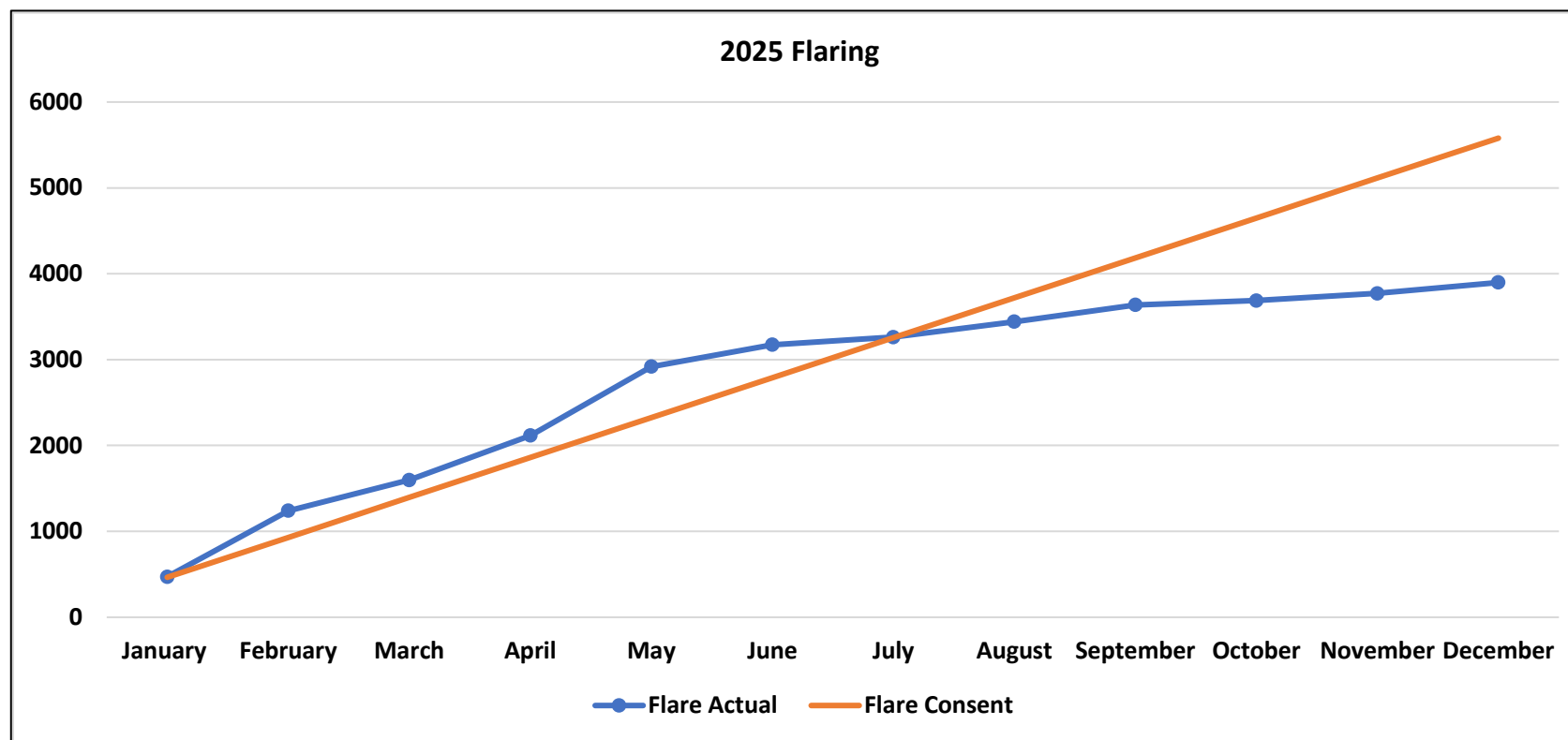


Figure 4-6: BW Catcher flaring amounts.

## 5 Incidents

BWOCUK strive to prevent the unplanned release of hydrocarbons and chemicals, however, on occasion accidental releases do occur. All unplanned releases of hydrocarbons and chemicals to sea from offshore oil and gas installations and pipelines, regardless of size, are reported to OPRED and other statutory agencies via the Petroleum Operations Notice 1 (PON1) form.

A number of processes are in place to prevent unplanned releases and these include planned maintenance of equipment, asset integrity inspections, activity risk assessment, area inspections, routine audits, procedural controls and training and competency for individuals interacting with process plant. Oil Pollution Emergency Plans (OPEPs) approved by OPRED are in place covering the installation. The plan is exercised on a regular basis and followed in the event that an unplanned release does occur, to ensure that the incident is reported in a timely fashion and that contingency and mitigation measures are in place.

### 5.1 Unplanned Release – PON1

During 2025, two PON1s were submitted to the regulator for unplanned releases from BW Catcher FPSO, as described in **Table 5.1** below.

**Table 5.1: PON1s submitted during 2025.**

| Name/ Description                              | Regulator tracking number | Release Type  | Release Quantity (tonnes) |
|------------------------------------------------|---------------------------|---------------|---------------------------|
| Hydraulic Oil Leak from Hose Reel              | IRS/2025/6665/PON1        | Hydraulic Oil | 0.000007                  |
| Crude Oil leak from failure of Offloading Hose | IRS/2025/7036/PON1        | Crude Oil     | 0.06                      |

### 5.2 Loss of Materials at Sea – PON2

During 2025, zero (0) PON2 notifications were submitted to the regulator in relation to loss of materials at sea from the BW Catcher FPSO.

### 5.3 Regulatory Non-Compliance (NC)

There were seven non-compliances raised in relation to permit condition breaches in 2025, as shown in **Table 5.2** below.

**Table 5.2: Non-Compliances during 2025.**

| Name/ Description                                                                                                            | Regulator tracking number | Release Type | Release Quantity (tonnes) | OPRED Status |
|------------------------------------------------------------------------------------------------------------------------------|---------------------------|--------------|---------------------------|--------------|
| Breached condition of permit – non-compliance related to monthly average concentration from condition 4.1 of approved permit | IRS/2025/5905/OPPC        | Crude Oil    | 0.0006                    | Completed    |
| Breached condition of permit – non-compliance related to monthly average concentration from condition 4.1 of approved permit | IRS/2025/6390/OPPC        | Crude Oil    | 0.0006                    | Completed    |
| Breached condition of permit – non-compliance related to monthly average concentration                                       | IRS/2025/6800/OPPC        | Crude Oil    | 0.0002                    | Completed    |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |                   |           |        |           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-----------|--------|-----------|
| from condition 4.1 of approved permit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |                   |           |        |           |
| Batch use allowance for CORR11389A has been exceeded. 150 litres was applied to the heating medium system which is above the permit allowance of 106 litres. Please note it will not be discharged to the marine environment. Chemical exceedance volume has been entered as 0.1 kg since entry is required. However overall permitted quantity has not been exceeded.                                                                                                                                                                                                                                                           | IRS/2025/6388/OCR | Chemical  | 0.0001 | Completed |
| CORR12452A applied maximum daily dosage of 49.25 mg/L exceeded. Due to a faulty stroke adjuster and lack of oil in chemical pump there was an overdosage between the 13 <sup>th</sup> and 22 <sup>nd</sup> November, specifically on the following dates: 13 <sup>th</sup> , 17 <sup>th</sup> , 20 <sup>th</sup> , 21 <sup>st</sup> , 22 <sup>nd</sup> , 24 <sup>th</sup> , 25 <sup>th</sup> , and 26 <sup>th</sup> November. There will be no discharge to the environment, however the annual chemical exceedance has been entered as 0.1 kg since entry is required. Overall annual permitted quantity has not been exceeded. | IRS/2025/7019/OCR | Chemical  | 0.0001 | Completed |
| CORR12452A applied maximum daily dosage of 49.25 mg/L exceeded. Due to a fault with the corrosion inhibitor pump, there was an overdosage on the 24 <sup>th</sup> of December. There will be no discharge to the environment, however the annual chemical exceedance has been entered as 0.1 kg since entry is required. Overall annual permitted quantity has not been exceeded.                                                                                                                                                                                                                                                | IRS/2025/7143/OCR | Chemical  | 0.0001 | Completed |
| The recent OPRED inspection identified non-compliance of the Catcher boilers with the Emission Limit Values (ELVs) specified in the PPC Permit PPC/91, Schedule I, Condition 3, Table 2. According to the permit, the ELVs for Nitrogen Oxides (NOx) are set at 200 mg/Nm <sup>3</sup> for both diesel and gas across each of the boilers. However, data from the 2020 stack monitoring indicated that the NOx emissions from the Catcher boilers exceeded the                                                                                                                                                                   | IRS/2025/6049/PPC | Emissions | -      | In review |

|                                                                                                                                                                                                                           |  |  |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|
| permitted limits. Specifically, the monitoring results showed that Boiler 1 emitted 349 mg/Nm <sup>3</sup> of NOx when running on diesel, while Boiler 2 emitted 324 mg/Nm <sup>3</sup> of NOx under the same conditions. |  |  |  |  |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|--|--|--|

## 6 Revision Summary

| Rev. | Date | Document owner to summarise key changes in the document |
|------|------|---------------------------------------------------------|
|      |      | Issued for Review                                       |
|      |      | Issued for Use                                          |