

Duncan Manning
Brent Asset Manager

Shell U.K. Limited
1 Altens Farm Road
Nigg
Aberdeen
AB12 3FY

Brentinfo@shell.com

07/04/2017

Shell Ltd UK: Brent Field decommissioning programmes

Please note that the Scottish Wildlife Trust has also signed up to the WWF response to this consultation.

The Scottish Wildlife Trust welcomes the opportunity to comment on the Shell Brent field decommissioning programme (DP). The Trust considers this application as an opportunity to set a precedent for all future oil and gas decommissioning programmes in UK waters, especially for those structures that meet the requirements for derogation under OSPAR 98/3. The Trust is supportive of the OSPAR 98/3 regulations and, in accordance with our policy on decommissioning¹, is prepared to adopt a case-by-case approach to decommissioning and support pragmatic solutions that present an environmentally net positive or least-damaging outcome.

The Trust is concerned that the proposed Brent field DP does not clearly demonstrate exactly how the four platforms (Alpha, Bravo, Charlie and Delta) all meet the OSPAR 98/3 derogation requirements. The omission of this data is worrying as it forms the basis of the DP and application for derogation (this is covered in greater detail in the WWF response). Due to this lack of information and data, the Trust cannot see how Shell's application for derogation under OSPAR 98/3 can be approved.

Legacy impact

It is the Trust's firm view that all marine activities must consider and maintain the quality, health and biodiversity of the waters they occupy, avoiding significant, cumulative, long-term or irreversible damage to the environment. The Trust has a particular interest in oil and gas activity because the decommissioning process has the potential to impact the environment in many ways. For example, removing a structure that has been in place for decades can have an immediate impact on the surrounding marine environment (e.g. the ecological impact of removing an artificial reef), yet leaving the structure *in situ* presents long-term risks that, in some cases, can persist for hundreds of years (e.g. pollutants left in drill cuttings or within the rig structure itself).

¹ https://scottishwildlifetrust.org.uk/wp-content/uploads/2016/09/002_293__decommissioningoffshoreinfrastructure_policy_1386585277.pdf

Patron HRH The Prince Charles, Duke of Rothesay **Chairman** Robin Harper **Chief Executive** Jonny Hughes

Scottish Wildlife Trust Harbourside House 110 Commercial St Edinburgh EH6 6NF
T 0131 312 7765 F 0131 312 8705 E enquiries@scottishwildlifetrust.org.uk W scottishwildlifetrust.org.uk



Protecting Scotland's wildlife for the future

The Brent field DP proposes to leave all four platforms *in situ*, and the Trust considers it paramount that all actions necessary are taken during these initial stages of the decommissioning process to eliminate any long-term environmental risks that these structures and associated materials present. With this in mind, the Trust finds the proposal to leave polluting materials in the cells of the gravity-based structures (GBS - Bravo, Charlie & Delta) concerning. When these structures begin to physically breakdown over time, these pollutants will eventually be released into the marine environment, either slowly or, potentially, rapidly in a sudden event where the legs of the GBS collapse and fall onto the cells below.

The Trust considers it Shell's responsibility to ensure all materials left on the seafloor are inert and pose no further environmental risks. The Trust understands that current technology may restrict the ability to remove these materials, but considering the oil and gas industry has built up decades of expertise in drilling and extracting oil and gas from deep beneath the seafloor, it seems the task of removing all the pollutants from the GBS cells would be fairly straight forward. If the Attic oil can be removed from the cells, then it should be possible to remove all other pollutants from the cells also. The Trust would like to see the same initiative applied to developing innovative technologies for extracting oil to be applied to the decommissioning process and believe there should be a commitment from Shell to develop the appropriate technologies to remove these polluting materials.

Long-term ecological monitoring

If Shell's application for derogation under OSPAR 98/3 is successful and the four oil rigs are left *in situ*, the Trust believes there should be a concerted effort to establish a long-running environmental monitoring programme to further assess the ecological role large offshore structures play. It is broadly acknowledged that offshore oil rigs act as artificial reefs and create hotspots for marine life. The Trust believes that the oil and gas industry, research institutes and the government should seize upon this opportunity to improve our understanding of artificial reefs and provide insights into the potential ecological value of a 'rigs-to-reefs' programme in the North Sea.

Environmental Stewardship Fund

The Trust recognises that there are many environmental benefits to leaving structures in place and advocates for further investigation and research into the potential for a 'rigs-to-reefs' programme in the North Sea. However, there is no denying that the installation and presence of oil and gas structures has had a significant environmental impact and that returning the environment to its pristine, pre-development condition is unlikely. It is, therefore, important that the degradation of the marine environment is acknowledged and accounted for by the oil and gas industry.

Therefore, the Trust proposes that a percentage of the savings to the oil and gas industry is placed in an Environmental Stewardship Fund that supports marine conservation, research projects, innovative technologies, and advancements in marine management. These projects could include: establishing *demonstration and research* MPAs; trialling sustainable fishing gear and practices; and increasing research into the carbon sequestration value of 'blue carbon' habitats.

The breadth of possibilities that decommissioning oil and gas infrastructure provides span across multiple sectors, involve multiple stakeholders, and include a range of potential environmental and social, as well as economic, benefits. The Trust believes that the Brent field DP inadequately explores these possibilities and feels that the proposed plan

Patron HRH The Prince Charles, Duke of Rothesay **Chairman** Robin Harper **Chief Executive** Jonny Hughes

Scottish Wildlife Trust Harbourside House 110 Commercial St Edinburgh EH6 6NF
T 0131 312 7765 F 0131 312 8705 E enquiries@scottishwildlifetrust.org.uk W scottishwildlifetrust.org.uk

Protecting Scotland's wildlife for the future

represents an opportunity lost for developing innovative and world-leading approaches, not just for decommissioning but for marine management as a whole.

Please can you keep the Trust informed of how this consultation progresses.

Yours faithfully,

Dr Samuel Collin

Marine Planning Officer

scollin@scottishwildlifetrust.org.uk

T. 0131 312 4735

M. 07721219916

Patron HRH The Prince Charles, Duke of Rothesay **Chairman** Robin Harper **Chief Executive** Jonny Hughes

Scottish Wildlife Trust Harbourside House 110 Commercial St Edinburgh EH6 6NF

T 0131 312 7765 **F** 0131 312 8705 **E** enquiries@scottishwildlifetrust.org.uk **W** scottishwildlifetrust.org.uk

The Scottish Wildlife Trust is a company limited by guarantee and registered in Scotland (registered no. SC040247).
It is also a Scottish registered charity (charity no. SC005792)