There are in excess of 600 offshore oil and gas installations in the North Sea, 470 of which are in United Kingdom (UK) waters. These structures include sub-sea equipment fixed to the ocean floor, as well as platforms ranging from the smaller structures in the Southern North Sea (similar in size to the Elizabeth Tower that houses Big Ben) to the enormous concrete or steel structures in the Northern North Sea that are as big as the Eiffel Tower and much, much heavier. In addition, there are many thousands of kilometres of pipelines and power and control cables (called umbilicals) lying on the seabed connecting installations to each other and exporting oil and gas for processing at onshore terminals.

Once production has ceased at a platform or field, the offshore installation and associated subsea structures must be decommissioned. In the most part, this means complete removal, although there are cases for some pipelines and components of some larger installations to remain in situ. Approval for decommissioning in the UK, whether that means full removal or not, follows formal consultation on a Decommissioning Programme accompanied by an Environmental Statement (ES).

The current approach to achieving project approval could see over 1,000 Environmental Impact Assessments (EIAs) undertaken for decommissioning projects alone. Where this cost and time burden might appear worthwhile for an operator and license holder in a development scenario, there is no future income from decommissioning. This makes clear the need for proportionate, streamlined and efficient approaches to all aspects of a decommissioning project, including the EIA.

Proportionate EIA can, to some degree, be considered a ‘buzz phrase’ in oil and gas, where EIA practitioners jostle for position to deliver sound environmental consultancy against a backdrop of industry-wide cost-cutting measures resulting from the downturn in oil price.

However, in decommissioning it could not be more straightforward to deliver proportionate EIA, for the following three reasons.

Firstly, unlike a greenfield development (and indeed unlike many brownfield developments), a decommissioning project is one where the vast majority of project activity occurs within an already used and well-studied area; one where the environmental baseline has been studied and monitored routinely before and during operation of the asset. This bank of knowledge helps to reduce uncertainty when trying to assess potential impacts and can, if used well, contribute to a more robust EIA.

Secondly, as the environmental baseline is very well understood, and the installations being decommissioned are also very well understood, the scoping phase of EIA can be more effective in reducing the number of potential impacts which need to be assessed, and focussing effort only where that additional effort will be valuable. The result should be a slim, streamlined ES which succinctly, yet robustly, assesses the key potential environmental impacts only.

Thirdly, supporting studies (such as wider fisheries consultation or quantification of atmospheric emissions) can be equally focussed and robust with a little advance planning. These supporting studies will help to inform decision making on the options for decommissioning (for example, when deciding whether to remove a platform or to leave it in place), and in turn will be used in the EIA. One approach that should be considered by practitioners looking at the decommissioning of multiple assets in one area is the use of a region-wide approach. For example, although multiple ESs are currently required to support the decommissioning of multiple assets in an area where those assets belong to different fields, much of the necessary supporting study work, and indeed much of the final documentation, will be similar.
Sensible preparation for and undertaking and reporting of those studies means that they can inform multiple ESs.

In addition to the above, the oil and gas industry and the Regulators’ and their scientific advisors have realised that they need to better understand the environmental implications of decommissioning approaches at an industry level, rather than a project-specific level. Various research studies are in progress or have been completed (e.g. on marine growth, on structural degradation) and should be considered by EIA practitioners, where relevant, to inform a more proportionate EIA.

In summary, EIA practitioners working on offshore decommissioning projects should be looking to maximise use of existing information for fields and locations and looking to minimise the amount of material submitted to the Regulator. With a combination of existing knowledge, well-informed stakeholders, sound strategic planning and industry-led research, it should be entirely possible to do this whilst maintaining robust and high-quality EIA practice.

_Pete Tipler, Decommissioning Lead at Xodus Group, March 2016._