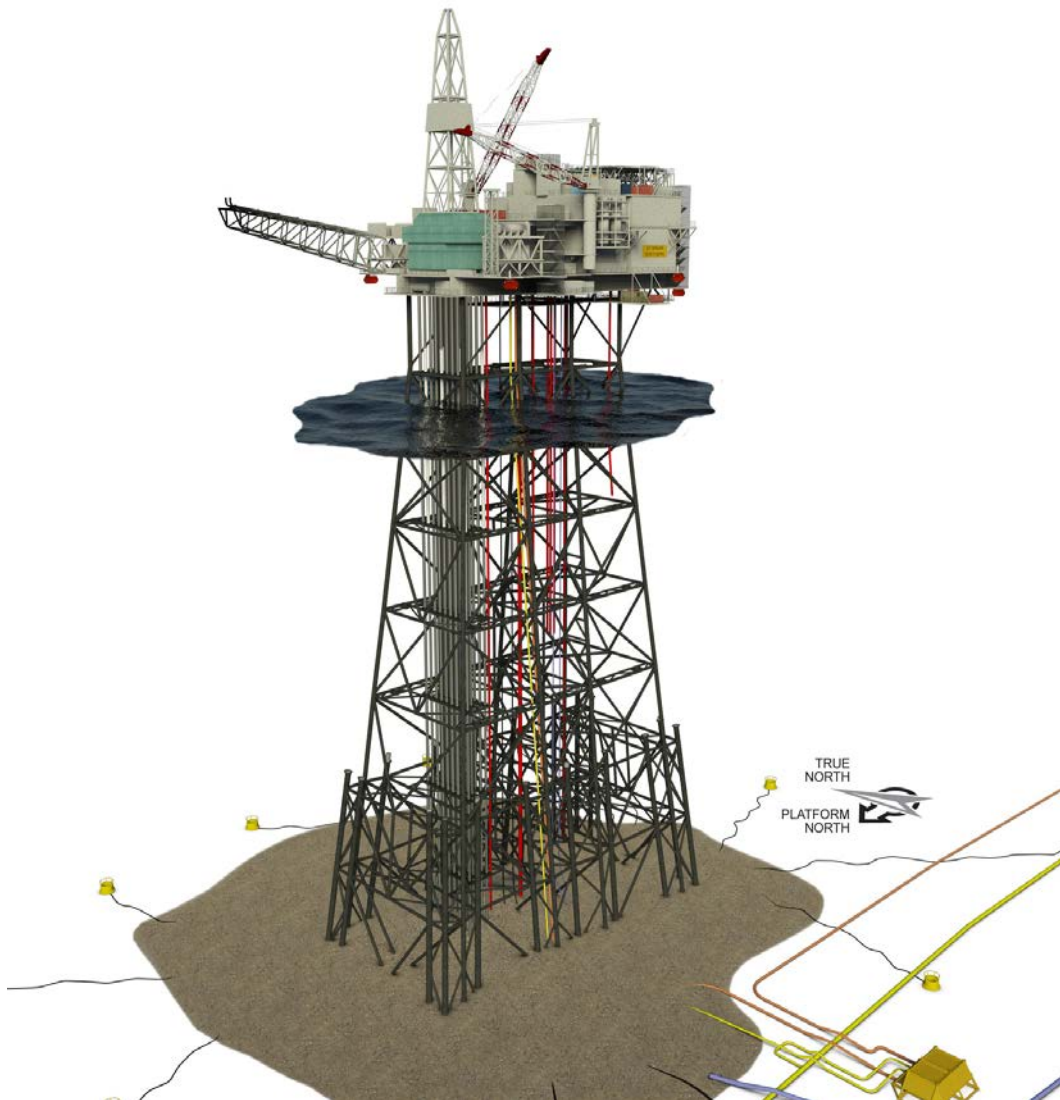




CNR International



**NINIAN NORTHERN PLATFORM
DECOMMISSIONING
STAKEHOLDER ENGAGEMENT REPORT**

P0005-CNR-PM-REP-00004

Document Control

Approvals

	Name	Signature	Date
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PREFACE

This Stakeholder Engagement Report is part of a suite of documents that supports the Ninian Northern Platform Decommissioning Programme to be submitted in 2017.¹

The report will be submitted to the Department for Business, Energy & Industrial Strategy (BEIS) in February 2017 as part of the statutory and public consultation alongside the Comparative Assessment Report,² Environmental Statement,³ and Independent Review Consultants' Final Report.⁴

These documents are all available online at www.cnri-northsea-decom.com on the Decommissioning Programme page.

¹ Ninian Northern Platform Decommissioning Programme – P0005-CNR-PM-REP-00005

² Ninian Northern Platform Decommissioning Comparative Assessment Report – P0005-BMT-PM-REP-00001

³ Environmental Statement for the Decommissioning of the Ninian Northern Platform – P0005-BMT-EN-REP-00006

⁴ Ninian Northern Platform Decommissioning – Final IRC Report – P0005-ENE-PM-REP-00001

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1. INTRODUCTION

This report sets out the measures which CNR International (UK) Limited (CNRI) has taken to engage with stakeholders during the development of the Decommissioning Programme for the Ninian Northern Platform (NNP) and its related subsea infrastructure. It summarises CNRI's approach to engagement and the programme to support this, highlighting issues, concerns and expectations which have been raised during the dialogue and the way in which these have been addressed.

The development of decommissioning options for NNP has followed investigation of all potential alternative uses for the platform (including reuse and recycling), supporting studies and a full comparative assessment for the key removal and disposal options for the platform jacket and drill cuttings, further described within the documents that underpin the Draft Decommissioning Programme.

The comparative assessment weighed the options against five key criteria as required by the Department for Business Energy and Industrial Strategy, BEIS (formally known as the Department of Energy and Climate Change, DECC):⁵ Safety risk to personnel (offshore, onshore and to other users of the sea), environmental impacts, societal impacts, technical and economic aspects. The starting point for the assessment of the decommissioning options was complete removal in order to leave a clean seabed, within which the possibility of partial removal was also considered.

The comparative assessment process and outcomes are described in full in the Draft Decommissioning Programme and its supporting documents, notably the Comparative Assessment Report and Environmental Statement, underpinned by the supporting studies used as the basis for the programme's development and submission to the UK Government.

The proposals set out in the Draft Decommissioning Programme are as follows:

1. All platform and subsea wells will be plugged and abandoned in accordance with Oil & Gas UK Guidelines.
2. The platform topsides modules will be removed and returned to shore for reuse, recycling or disposal.
3. It is recommended that the jacket be removed down to the top of footings (-88.5m below sea level, dependent on final removal method) and returned to shore for reuse, recycling or disposal. The jacket footings would then be left in place.
4. The drill cuttings pile located within the jacket footings will be left *in situ* to degrade naturally with time.
5. On completion of the Decommissioning Programme at NNP, a seabed survey will be undertaken to identify oilfield related debris within the platform 500 m zone. All items of oilfield debris will be categorised and in consultation with BEIS a management and

⁵www.gov.uk/government/uploads/system/uploads/attachment_data/file/69754/Guidance_Notes_v6_07.01.2013.pdf

recovery plan will be agreed. Following completion of the recovery plan, verification of seabed clearance by an independent organisation will be carried out.

6. All subsea pipelines and infrastructure will be cleaned and will remain in-situ until wider field decommissioning. Disused Pipeline Notifications will be sought from BEIS.

2. COMMITMENT TO STAKEHOLDER ENGAGEMENT

CNRI recognises that constructive two-way dialogue with its stakeholders is essential for long-term, sustainable operations and is fundamental to developing a well-structured and robust decommissioning programme.

Stakeholders are defined as any individual or group with an interest in or some aspect of rights in ownership of a decommissioning project who can contribute in the form of knowledge or support, or who can impact or be impacted by the project, its work or outcome, or have views on these matters.

From the outset of planning for the decommissioning of NNP, the company has sought to develop relationships and dialogue to best meet stakeholders' needs and expectations and inform the development of the best possible set of proposals. The approach adopted by CNRI has focused on developing close working relationships with interested parties, establishing confidence and trust to share understanding and identify where additional opportunities and ideas can usefully be explored. The company is committed to transparency and to making available to stakeholders in a timely manner all information and data that can reasonably be provided, as well as to treating all stakeholders equally.

Communication of the various issues and concerns raised by the decommissioning studies so that they are understood and can be properly considered by stakeholders has been a priority, as has gaining stakeholders' feedback and views on decommissioning scenarios to inform the development of the best possible plans.

The engagement programme has provided important input into the company's decision making process, complementing where appropriate the statutory approvals process or CNRI's own approvals process.

2.1 Identification of Stakeholders

There are a variety of stakeholders associated with the decommissioning of the platform, each with their own area of interest and remit. The first step in the pre-planning stage was to develop a rounded communication programme which would meet stakeholder needs.

The programme started with an initial identification of potential stakeholders within the context of their respective interests. This was undertaken by ascertaining:

- Known interest in issues specific to the project or to decommissioning
- Other relevant decommissioning projects
- Stated interests and remit
- Area of operations, national and international
- Known involvement with or interest in stakeholder engagement in other decommissioning projects
- Working history with CNRI and ongoing relationships

Additional stakeholders were added during the planning phase, and will continue to be added, where gaps are identified or there is a request for involvement. A full list of the current stakeholders for the purposes of engagement on the comparative assessment and preparation of the Decommissioning Programme are listed in Appendix 1.

2.2 Independent Review Consultants

CNRI appointed an independent review consultant⁶ (IRC) to verify the completeness of the pre-planning studies and to confirm the methodology for and adherence to the comparative assessment process adopted by the Company for determining the way forward. The IRC provided challenges as part its oversight of the project which acted as an initial proxy for the broader stakeholder review, ensuring that the comparative assessment process was robust.

2.3 Summary of Main Stakeholder Groups

The main stakeholder groups for the NNP decommissioning pre-planning were identified as follows:

- CNRI employees and contractor crew (offshore and onshore)
- NNP partners
- Government departments
- Government and regulatory agencies
- Industry and industry organisations
- Local authorities
- Environmental non-governmental organisations (NGOs)
- Commercial partners with infrastructure links to NNP
- Supply chain and representative organisations
- Section 29 Non-Equity notice holder (companies with ongoing liabilities towards NNP)
- Statutory consultees

2.4 Engagement Strategy

2.4.1 Best Practice

The decommissioning of NNP is the second decommissioning project that CNRI will be undertaking as a Company. Lessons learned from the Murchison project are therefore considered important to understand and anticipate as fully as possible the potential issues which could arise during the development of the project.

With respect to stakeholder engagement, an early priority was to inform development of the communications programme incorporating best practice examples and lessons learned.

⁶ The role of Independent Review Consultant is described in the Comparative Assessment Procedure – P0005-CNR-PM-PRO-00001

2.4.2 A Tailored Approach

Throughout the pre-planning and as a result of lessons learned from Murchison, in addition to conversations with other operators, CNRI has been conscious of the demands on stakeholders in terms of the pressure that stakeholder engagement can present on their resources (time and financial).

The strategy adopted for communication was therefore to develop a tailored approach to consultation wherever possible, adapted to the needs of stakeholders rather than a 'one size fits all approach,' with relationships, built on individual communications needs and preferences.

This approach informed the discussions throughout the pre-planning stages and will continue to underline the ongoing stakeholder engagement programme to ensure that views are captured and issues addressed in the most constructive way possible as the project moves forward into the execution phase.

Bilateral and multilateral update meetings with stakeholders according to their preferences have been held in order to share news on progress, stimulate discussion, understand expectations, address and resolve any potential issues and seek collaborative opportunities.

In recognition of the benefits of sharing views and priorities on the five key criteria which formed the basis of the comparative assessment, stakeholders were invited to attend a formal workshop (described below), held in December 2016.

2.4.3 A Dedicated Website

To facilitate the sharing of information and to act as a portal for those seeking information on the decommissioning pre-planning process a dedicated website was established at an early stage (www.cnri-northsea-decom.com). This included a 'contact us' link.

The website will be a significant role in the statutory consultation that will accompany the submission of the Draft Decommissioning Programme. DECC Guidance Notes⁷ state that *"operators will need to develop and manage a wide-ranging public consultation process"* and Oil & Gas UK has also published guidelines⁸ on stakeholder engagement. Both clearly specify the use of the internet to inform stakeholders and to publish documents for formal consultation on decommissioning programmes.

⁷ Guidance Notes for Decommissioning of Offshore Oil and Gas Installations and Pipelines
www.gov.uk/government/uploads/system/uploads/attachment_data/file/69754/Guidance_Notes_v6_07.01.2013.pdf

⁸ Oil & Gas UK Guidelines on Stakeholder Engagement during Decommissioning Activities, available online at <http://oilandgasuk.co.uk/product/guidelines-on-stakeholder-engagement-during-decommissioning-activities/>

2.4.4 A Stakeholder Focal Point

Engagement and communications has been managed throughout the pre-planning phase by a single contact of point. This Stakeholder Engagement Lead will continue to facilitate engagement during the statutory consultation period of the Draft Decommissioning Programme and for the derogation application and thereafter will do so for the final decommissioning application.

3. KEY ELEMENTS OF THE ENGAGEMENT PROGRAMME

3.1 Baseline Environmental Survey Scoping

In December 2010, as part of the pre-planning process, CNRI met with the BEIS Environmental Management Team, the Joint Nature Conservation Committee (JNCC) and Marine Scotland. The objective was to not only provide an overview of current decommissioning activities and intentions but to specifically discuss proposals for the scope of the baseline environmental survey and to agree the way forward. The aim of the survey was to establish the current state of the subsea environment on the basis of data from literature and field surveys. The subsequent survey scope met the requirements of all parties and the baseline environmental survey was completed at the Ninian Field in 2011.

Following re-commencement of planning the decommissioning of NNP in 2016, a copy of the baseline environmental survey⁹ was provided to BEIS EMT and JNCC. A meeting with BEIS EMT was held in June 2016 to provide an update on the project and both parties were provided with the Environmental Impact Assessment (EIA) Scoping Report in August 2016.

In discussion with BEIS EMT, a technical report was compiled that addressed comments from JNCC and BEIS EMT to re-validate the 2011 survey for the planning phase of decommissioning in 2016.

The NNP jacket supports colonies of the cold water coral, *Lophelia pertusa*, which have been assessed in several marine growth surveys. Previous communication with JNCC has advised that as the coral would not have occurred without the presence of the platform, mortality as a result of decommissioning operations would not be considered as an issue of significant concern for the Environmental Impact Assessment. The extent and distribution of this cold water coral is further reported in the Environmental Statement.

3.1.1 Environmental Impact Assessment (EIA) Scoping Report

In August 2016, the EIA Scoping Report for the project was published¹⁰ on the dedicated project website and distributed to stakeholders by e-mail. Designed to establish the issues, data requirements, and impacts to be addressed through specific investigation, CNRI was keen to encourage comment by interested parties so that views could be taken on board from an early stage and incorporated into the Comparative Assessment and Environmental Statement.

The stakeholder group including statutory consultees were offered the opportunity to comment on the EIA Scoping Report that month. Where stakeholders were not available by telephone, email contact (with copies of the report) was made. In mid-September, reminder emails were subsequently sent to those who had not already commented.

⁹ Pre-Decommissioning Environmental Baseline Survey for the Ninian Field P0005-ERT-EN-REP-00001

¹⁰ <http://www.cnri-northsea-decom.com/EIA%20Scoping%20Report-Ninian%20Northern%20Platform.pdf>

The main substantive points raised by stakeholders are summarised as follows:

- Consideration should be made to potential noise impacts including the use of explosives.
- The Decommissioning Programme should be clear as to how the drill cuttings pile will be managed/ avoided and assessment of the environmental impact and any mitigation measures presented in the ES.
- Presenting the cuttings distribution/ footprint in relation to the jacket to understand the extent of the pile, the potential activities that may disturb the pile as well as the recovery rates.
- Cumulative impacts of the phased decommissioning works and the impacts of other operations and industries should be considered.
- Ensuring that all the receptors impacted have been considered in the scoping stage.
- An assessment of the marine growth against the Habitats Directive should be made.

CNRI provided individual responses to stakeholder comments describing how any concerns would be addressed within the final NNP Environmental Impact Assessment. Table 4.2 of the Environmental Statement identifies the influence on the NNP EIA of these comments and specifies where details of outcomes can be found.

In addition to those who responded with specific environmental points, several stakeholders used the contact as opportunity to draw attention to points which they considered needed to be incorporated into the planning for the broader Decommissioning Programme. This included the Northern Lighthouse Board who was keen to be involved in discussions related to the safe marking and lighting of the platform and jacket.

3.2 Stakeholder - Follow Up Discussions

3.2.1 Scottish Fishermen's Federation/ FLTC/ NFFO (September 2016)

A meeting was held with the Scottish Fishermen's Federation (SFF) who also represented the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Ltd (FLTC) and National Federation of Fishing Organisations (NFFO), to provide a summary overview of the project and to answer any queries arising.

During the discussions, it was clear that one of the key areas of interest was the approach to the drill cuttings pile in the instance where the jacket footings could be left in place, as this could have the advantage of protecting cuttings piles from disturbance and therefore prevent potential problems associated with contamination of fishing gear.

In addition, as the pipelines tied back to NNP will be decommissioned under a later decommissioning programme, the SFF queried the distance between the footings and the pipeline cutting locations to understand potential for snagging risk. SFF were provided with the potential locations for positive isolations of pipelines as well as more detail on the extent of the cuttings pile for informal review.

3.2.2 Joint Nature Conservation Committee (JNCC) (September 2016)

Comments were received from JNCC in response to the EIA Scoping Report. Alongside comments on the level of detail in the EIA Scoping Report, JNCC commented on the scope of the comparative assessment, requesting that it covered partial removal of the cuttings, well plug and abandonment options as well as leaving the jacket in-situ. CNRI highlighted that the comparative assessment would consider partial and full removal of the jacket in line with DECC Guidance notes and five management options for the drill cuttings pile that would include excavation and treatment/ disposal either offshore or onshore, excavation and re-distribution offshore, excavation and reinjection and leave in-situ. Timescales and cumulative impacts from the project were also raised and these were subsequently addressed in the Environmental Statement.

3.2.3 Marine Scotland (September 2016)

Comments were received from Marine Scotland in response to the EIA Scoping Report. These included a request for further detail on the drill cuttings pile in terms of its extent and distribution, information on the samples taken from the cuttings pile and an understanding of the cumulative impacts associated with the decommissioning project as a whole. Marine Scotland was provided with detailed images of the cuttings pile and sample information was presented in detail in the Environmental Statement. Cumulative consequences from the project were presented within the Environmental Statement and included a summary of the cumulative aspects of decommissioning the entire Ninian Field over a longer timescale.

3.3 Comparative Assessment – Incorporation of Stakeholder Views

Stakeholder views were reported to the specialist team of CNRI staff and external consultants, observed by an Independent Review Consultant, present at the Comparative Assessment Workshop in October 2016 (described in more detail in the Comparative Assessment Report¹¹).

This workshop was the forum for bringing together the results and total weighted scores from the comparative assessment scoring workshops held during that month and considering the options to be taken forward.

A short presentation was made at the start of the scoring workshops to reinforce to specific stakeholder concerns and priorities, set within the context of two overarching – and repeatedly restated – stakeholder expectations: “clean seabed” must be the starting point for option consideration; and “safety first” to ensure that safety rather than cost must drive decision making. The presentation included feedback received during the consultation for the Murchison decommissioning project and focused on the following issues:

¹¹ Ninian Northern Platform Jacket & Drill Cuttings Comparative Assessment – P0005-BMT-PM-REP-00001

Jacket

- Consideration of cumulative impacts associated with phases of decommissioning and wider field decommissioning
- Continued inaccessibility of current exclusion zone for fishermen for long timescales and under the partial removal scenario
- Comments raised during Murchison engagement, including invasive species from marine growth falling off structure and incorporating the use of proven technology for jacket removal

Drill cuttings

- Consideration of the management/ avoidance of the cuttings pile and a full assessment of the environmental impacts and any mitigation measures for the proposed operations
- Possible long term persistence of contaminants and impacts that could arise from the drill cuttings pile if left *in situ* or redistributed
- Potential contamination of fishing gear from the drill cuttings pile
- Full removal of the platform jacket would require displacement of a large proportion of the drill cuttings pile
- Comments raised during Murchison engagement, including understanding the contents of the pile, assessing seabed disturbance along with other aspects such as noise and consideration of drill cuttings re-injection

3.4 Comparative Assessment – Follow Up on Stakeholder Concerns

Taking into consideration previous stakeholder concerns on the Murchison project, a study was commissioned for NNP to understand the impacts resulting from eventual collapse of the jacket footings in order to model the potential impacts on the drill cuttings pile over a long time scale.¹² In addition, potential methods for sampling the entire depth of the drill cuttings pile have been discussed to identify how technical and structural challenges might possibly be overcome to address the need for greater knowledge of the cuttings pile contents. The investigation into further advancements in technology through discussions with other operators and specialist contractors will continue in to the future for the NNP.

3.5 Stakeholder Workshop – 7th December 2016

CNRI held a Stakeholder Workshop to inform stakeholders of the outcome of the comparative assessment process in relation to the options for the NNP jacket and drill cuttings.

¹² Ninian Northern Platform Modelling Disturbance from the Collapse of Structural Piles – P0005-GEN-EN-REP-00003

The workshop was held in Aberdeen on 7th December 2016 with the agenda that covered the comparative assessment results as well as any wider comments on the project.

The draft Comparative Assessment Report was provided to all stakeholders as a pre-read (whether or not they were planning to attend) which described how CNRI balanced safety, environmental, societal, technical and economic aspects in identifying the options to be presented in the Decommissioning Programme. A commitment was made to address any issues which stakeholders considered material to the confirmation of the options to be taken forward prior to submission of the Draft Decommissioning Programme to BEIS.

The workshop, facilitated by BMT Cordah, sought to provide an overview of the project and to answer questions through individual discussions with the project team to gain feedback and inform the way ahead.

Comment on the recommendations was sought from all parties, whether or not they planned to or were able to attend the workshop. CNRI also offered opportunities for stakeholders to meet to discuss any aspect of the proposals.

The aims of the Stakeholder Workshop were:

- To build an understanding of the recommendations being proposed for the decommissioning of NNP following the comparative assessment and answer any questions.
- To hear and understand from stakeholders:
 - In respect of the comparative assessment, what else (if anything) needs addressing before submission of the Draft Decommissioning Programme;
 - Any issues outside of the scope of the comparative assessment which need to be incorporated into on-going planning.
- Collate the learning on issues arising from stakeholder engagement on platform decommissioning – both in terms of the content and the process to apply to future CNRI or others decommissioning projects.

In all, 18 external stakeholders attended the workshop (see details at Appendix 2).

Presentations given by the CNRI team, the agenda and the posters were published online and stakeholders notified. The main points raised by stakeholders are presented in Appendix 3 of this report. Feedback from the workshop was positive highlighting that the flexible nature of the workshop was of benefit to those who attended and the presentations and format was informative.

3.6 Additional Actions Arising

A core element of the Stakeholder Workshop was to ascertain whether participants considered there to be any additional matters which needed to be addressed before submission of the Draft Decommissioning Programme. This was carried out through individual

conversations with the project team and the various mechanisms in the room to allow stakeholders to comment on the process. The majority of the queries and issues raised by stakeholders in this session had been accounted for and could be responded to in the workshop. All other queries could be addressed through descriptions within the Environmental Statement (further detail is set out in Appendix 3).

CNRI also sought to establish whether there were any issues which, while outside of the scope of the comparative assessment process itself, needed to be incorporated into ongoing planning for the decommissioning of NNP. These are set out, together with CNRI's response, in Appendix 3.

3.7 Other Stakeholder Engagement

Regular dialogue with interested parties has been a feature of the pre-planning for the decommissioning of NNP. Updates and meetings beyond those described above (which relate most particularly to the comparative assessment and options selection) are summarised below.

3.7.1 CNRI Employees and Contractor Crew (Offshore and Onshore)

Internal communications within CNRI has been an important focus of engagement for the project. This reflects not only the needs of platform crew for information on how and when they will be affected but also how decommissioning activity will be structured and thus impact on their working lives and wellbeing. Furthermore, the safe operation of the platform both in the lead up to cessation of production and during decommissioning itself is inherent in CNRI's core values.

To facilitate these communications, visits to the platform have been undertaken by various members of the decommissioning team since August 2016. These have provided rounded opportunities to speak to crew collectively and in small groups, answering questions and reporting on project progress and intentions.

Contractor management companies responsible for provision of the crew on NNP were also given early notification of decommissioning pre-planning activity in May 2016, with a follow up session in November 2016 confirming intention to proceed with decommissioning and confirming timescales.

One of the key focus areas for engaging with employees and contractors is to utilise the incumbent core crew to undertake the engineering down and cleaning phases and thus remain on the platform until down man.

3.7.2 Ninian Northern Platform Partners

Regular meetings have been held with JX Nippon, CNRI's joint venture partner. At the formal partner meetings, increasing focus has been given to the pre-planning for the

decommissioning of the platform and above this additional workshops and briefings have taken place to ensure understanding of the developing proposals and secure commercial support as the programme development has progressed.

JX Nippon representatives were invited to the stakeholder workshop and have been fully involved in the comparative assessment process, notably by attending the Comparative Assessment Workshop (October 2016).

JX Nippon representatives also attended several meeting with BEIS and the Oil and Gas Authority (OGA).

3.7.3 Government Departments (BEIS and OGA)

CNRI have had regular meetings with BEIS's Offshore Decommissioning Unit (ODU) and OGA (June, August, October, and December 2016) which have been primarily focused on progress updates of the pre-planning process leading up to the submission of the Draft Decommissioning Programme. This has included an overview of the Comparative Assessment method and a briefing on the initial results.

A meeting was also conducted with BEIS Environmental Management Team and Offshore Inspectorate in August 2016 which included a discussion on the requirements for the permit applications at a later stage. In addition, BEIS and OGA were represented at the stakeholder workshop.

A further meeting was held with OGA in October 2016 to discuss the requirements and timings for PWA variation submissions for pipelines & umbilicals associated with NNP.

In conjunction with OGA and BEIS, the NNP decommissioning project team has been involved in the development of a decommissioning roadmap for the industry based on the experience gained thus far in the Murchison decommissioning project. This forms part of the OGA decommissioning Roadmap Building Blocks, which aim is to provide indicative timings of key milestones throughout a project and enhancing the importance of early engagement with the Regulators.

3.7.4 Other Government and Regulatory Agencies

In addition to meetings with BEIS Environmental Management Team, CNRI also met with the Health and Safety Executive in October 2016 to share details of the pre-planning activity and to receive guidance on the nature of issues which would be faced as the project developed. The HSE highlighted two phases for action:

- 1) The need to ensure that they are kept informed of activities and engaged at an early stage;
- 2) The need to ensure that safety cases are appropriately timed and cover the activities being undertaken

Representatives from the Health and Safety Executive also attended the Stakeholder Workshop.

3.7.5 Statutory Consultees

A meeting was held with the Scottish Fishermen's Federation (SFF) in September 2016 to introduce the SFF to the NNP decommissioning project in detail. In addition the SFF provided useful input to the initial studies regarding the potential impacts on the fishing community.

SFF were invited to attend the technical scoring and overall Comparative Assessment Workshop in October (described in sections 3.4 and 3.5) and also attended the main Stakeholder Workshop in December.

Engagement with the National Federation of Fishing Organisations (NFFO) was undertaken through the SFF.

In addition, to being provided the EIA Scoping Report, invitations were issued to the Northern Ireland Fishermen's Organisation and to Global Marine Systems for the Stakeholder Workshop. Although no representatives were available to attend, follow up e-mails have been sent to initiate comment. In addition, invitations for one-to-one briefings have been offered but not yet taken up.

3.7.6 Industry and Environmental Umbrella Organisations

CNRI has been active in communicating lessons learned from the Murchison decommissioning project and how these will be applied on the NNP decommissioning project. Presentations have been given by CNRI at numerous conferences (including Decom North Sea/ OGUK, Energy Industries Council). Subjects presented have included structural aspects, well plug and abandonment and supply chain. In addition, there has been direct engagement with disposal yards and with Decom North Sea to understand disposal capabilities within the UK. Further opportunities to engage with Scottish Enterprise and Highlands and Islands Enterprise are being explored at the time of writing.

Regular attendance at Decom North Sea and Oil & Gas UK decommissioning events since late 2010 have provided additional opportunities for both engagement with other operators and the supply chain on a formal and informal basis.

3.7.7 Supply Chain and Representative Organisations

Following a review of study work, the supply chain has been engaged in 2016 for the removals contractor services.

A cross section of potential removals services contractors has been met to seek their input on the following:

- CNRI's proposed base case for packaging the scope

- How well the scopes will be defined or what measures are recommended to improve definition
- The risks, how controllable they are and who should own them i.e. contractor or CNRI
- What remuneration structures would be appropriate e.g. lump sum, target cost, reimbursable

Similar engagement sessions have been held in 2016 with well plugging and abandonment companies. Formal engagement on the invitations to tender will commence in 2017 with removals services contractors.

All engagement has been conducted in line with CNRI's contracting procedures.

3.7.8 Commercial Partners with Infrastructure Links to Ninian Northern Platform

The Lyell power and control unit is operated from NNP. Engagement has taken place with partners associated with Lyell including the possibility of relocating this control unit to another platform.

3.7.9 Section 29 Non-Equity Notice Holder Company

The Section 29 Non-Equity notice holder company with on-going liabilities towards NNP was notified in writing of CNRI's intention to commence pre-planning studies for decommissioning in November 2016.

Presentations will be offered on submission of the Draft Decommissioning Programme and launch of the statutory consultation.

4. NEXT STEPS

4.1 Statutory Consultation

In accordance with DECC Guidelines, submission of the Draft Decommissioning Programme triggers statutory consultations (normally 30 days in length) as required under section 29(3) of the Petroleum Act. The statutory consultees comprise:

- The National Federation of Fishermen's Organisations
- The Scottish Fishermen's Federation
- The Northern Ireland Fishermen's Federation
- Global Marine Systems Limited

As well as the four statutory consultees, stakeholders with whom CNRI has engaged with to date will be alerted in writing to the commencement of the consultation, its duration and availability of materials.

Furthermore, announcement of the proposals will be accompanied by placing public notices in appropriate national and local newspapers and journals (as advised by BEIS). Examples of these and full details of the publications will appear in the post-consultation version of the Stakeholder Report.

The five principal documents – Decommissioning Programme, Comparative Assessment, Environmental Statement, Stakeholder Engagement report and the IRC Independent Verification Report will be published online at www.cnri-northsea-decom.com.

Hard copies of the draft Decommissioning Programme and supporting documents will be available upon request for viewing at CNR International's office, St. Magnus House, Guild Street, Aberdeen AB11 6NJ, Monday to Friday during normal working hours (normally 9am to 4pm). Please contact Gabriel Neves on nnpdecom@cnri.com or 01224 303600 for further information.

4.2 Consultation Results

The results of the statutory consultation on the Draft Decommissioning Programme will be reported in the Stage 2 Decommissioning Programme when formally submitted for approval, at which point (and in line with the DECC Guidelines) correspondence with interested parties will be appended to this report and an indication provided of the extent to which views have been taken into account.

Should BEIS agree that the proposals being put forward form a suitable derogation case, CNRI will be asked to submit a Derogation Application which BEIS will issue to OSPAR¹³ for consideration by the Contracting Parties.

¹³ www.ospar.com

5.0 APPENDICES

- APPENDIX 1 External Stakeholder Organisations
- APPENDIX 2 List of External Participants in the Stakeholder Workshop 7th December 2016
- APPENDIX 3 Table of Stakeholder Comments Raised During Consultation

To be added post consultation:

- APPENDIX 5 Copy of Public Notice(s)*
- APPENDIX 6 Consultation responses from Statutory Consultees/CNRI Replies*
- APPENDIX 7 Consultation responses from Other Stakeholders/CNRI Replies*

APPENDIX 1

External Stakeholder Organisations

Aberdeen and Grampian Chamber of Commerce
Aberdeen City Council
Aberdeen Harbour Board
Aberdeenshire Council
British Geological Survey
British Marine Federation
Capturing the Energy
CEFAS (Centre for Environment, Fisheries & Aquaculture Science)
Centre for Environmental and Marine Sciences
CNRI platform contractor crew
CNRI platform staff
Department for Business, Energy and Industrial Strategy (BEIS)
Decom North Sea
Department for Environment, Food and Rural Affairs (DEFRA)
Dutch Ministry of Infrastructure and Environment
East of England Energy Group
EIC (Energy Industries Council)
European Commission (Representation in Scotland)
ENI UK Limited
FLTC Services Ltd
Forth Ports
Friends of the Earth Scotland
Global Marine Systems Ltd
Greenpeace Research Laboratories
Health & Safety Executive
Highlands & Islands Enterprise
Industry Technology Facilitator
International Marine Contractors Association (IMCA)
International Maritime Organisation
Joint Nature Conservation Committee
JX Nippon Exploration and Production (U.K.) Ltd
KIMO UK (Local Authorities International Environmental Organisation)
Lerwick Port Authority
Marine Conservation Society
Marine Scotland
Maritime and Coastguard Agency
National Federation of Fishermen's Organisations (NFFO)

North Sea Commission
North Sea Regional Advisory Council
Northern Ireland Fishermen's Federation
Northern Lighthouse Board
Offshore Contractors Association (OCA)
Oil and Gas Authority
Oil and Gas Producers
Oil & Gas UK
OPITO
Plymouth Marine Laboratory
Royal Yachting Association
RSPB Scotland
Scottish Association for Marine Science
Scottish Enterprise
Scottish Environment LINK
Scottish Environmental Protection Agency
Scottish Executive (Radioactive Waste)
Scottish Fishermen's Federation (SFF)
Scottish Natural Heritage
Scottish Oceans Institute (University of St Andrews)
Shetland Oil Terminal Environmental Advisory Group (SOTEAG)
The Crown Estate
University of Aberdeen - Royal Institute of Navigation
University of Aberdeen Business School
Whale and Dolphin Conservation Society
WWF Scotland

APPENDIX 2

List of External Participants in the Stakeholder Workshop 7th December 2016

Name	Stakeholder Organisation
Lucie Hrubesova	Aberdeenshire Council
Joe Chapman	Capturing the Energy
Jennifer Dunbar	Decom North Sea
Claire Thompson	Department for Business, Energy and Industrial Strategy
Mark Bayman	Department for Business, Energy and Industrial Strategy
Stuart Welsh	Department for Business, Energy and Industrial Strategy
Andrew Bright	Energised Environments (Independent Review Consultants)
Stuart McGowan	Energised Environments (Independent Review Consultants)
Sarah Hutcheon	Energy Industries Council
Gavin Booth	Forth Ports
June Calder	Health & Safety Executive
Rachel Ball	Joint Nature Conservation Committee
Graham Humphries	KIMO (Local Authorities International Environmental Organisation)
Neil Edward	Oil and Gas Authority
Richard Fresson	Royal Yachting Association Scotland
Michael Buchan	Scottish Environmental Protection Agency
Steven Alexander	Scottish Fishermen's Federation
Professor Alex Kemp	University of Aberdeen Business School

APPENDIX 3**Table of Stakeholder Comments Raised During Consultation Process**

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
General	Long term liability must be addressed.	The Decommissioning Programme will address this and will be agreed with BEIS. It is included in cost estimates and takes into account liabilities to safeguard the fishing community.	Decommissioning Programme
Safety/ Societal	Partial removal of jacket legs and pipelines left on the seabed could represent a hazard to non-UK/non-EU (e.g. Norwegian) fishermen if not in possession of relevant language versions of FishSafe, Kingfisher and other marine plotting systems.	Kingfisher Information Services advise that the five languages chosen for translation of data for FishSafe charts, online notices, information and downloads - the only project of its type in Europe - represented the key EU fishing nations working with the EU sector. The information was gained after consulting with both fishing and offshore oil and gas industries. FishSAFE is also widely promoted throughout the major fishing exhibitions of Europe and Kingfisher state that they receive excellent feedback from fisherman as to its importance and uptake. The SFF has offered to assist in non-UK stakeholder engagement in connection with the Decommissioning Programme through relevant organisations and trade bodies.	Stakeholder Engagement Report

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Societal	Give credit to the positive economic impacts that onshore activities may bring to communities offsetting some of the negatives, such as odour.	Acknowledged – positive socio economic effects are qualitatively presented within the comparative assessment results.	Comparative Assessment Report
Societal	At the start of the oil boom, fishermen were promised a clean seabed - this must be considered during the comparative assessment.	DECC Guidelines require a balanced assessment to be struck between safety, technical, environmental, societal and cost factors and the comparative assessment will seek to achieve this, taking full removal as the starting point.	Comparative Assessment Report; Decommissioning Programme
Technical	How are new technologies being considered on the project.	Engagement with the supply chain has been undertaken to establish new prospects for overcoming technical challenges and are being considered. The focus to date is on exploring existing technologies or those with the backing to be successfully brought to market in order not to be let down during the decommissioning process, but liaison continues to take place in case viable solutions can be brought forward. New types of vessel and other technologies will be considered for future decommissioning activity.	Stakeholder Engagement Report
Technical	Need for the introduction and promote the use of new/ novel technology.	Acknowledged, this requires an industry wide solution with encouragement from regulators.	Stakeholder Engagement Report
Environment	Opportunities for consultation regarding onshore disposal of waste – requires early engagement with appropriate local councils.	This will depend on the final destination for waste and selection of contractors will require assurances on community concerns.	Environmental Statement

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Environment	It is essential that the NNP Decommissioning Programme is clear about how the drill cuttings pile will be managed/ avoided and a full assessment of the environmental impacts and any mitigation measures for the proposed operations presented in the ES.	The decision on how the NNP drill cuttings pile will be decommissioned was assessed during the comparative assessment. An assessment of environmental impacts associated with the decommissioning of the drill cuttings pile and the proposed mitigation is presented in the ES.	Comparative Assessment Report; Environmental Statement; Decommissioning Programme
Environment	It is noted that there are no European designated Marine Protected Areas in the vicinity of NNP; however, consideration should also be given in the ES to nationally designated National Conservations MPAs.	ES and DP include a description of the European and nationally designated MPAs in the northern North Sea and in the vicinity of NNP.	Environmental Statement; Decommissioning Programme
Environment	It is noted that with regard to potential noise impacts, vessel noise and various cutting techniques are outlined as potential noise sources, with no mention of potential explosives use, which is sometimes used in well abandonment.	The proposed methods for jacket removal are fully described in Section 2 of the ES. The current project scope will cover all cutting options and where explosives are proposed, a full assessment will be made.	Environmental Statement

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Environment	<p>When presenting information on drill cuttings, the cuttings distribution should be expressed as a percentage volume of the total drill cuttings volume with distance away from the footings. This provides a much clearer understanding of:</p> <ul style="list-style-type: none"> - Where the majority of the drill cuttings volume is located together with its associated footprint. - The depth of drill cuttings for the majority of the cuttings pile footprint. - Estimated contaminant recovery rates for impacted seabed surface sediments. - Potential anchor locations for vessels working on the project. 	<p>The drill cuttings pile is almost entirely situated under the platform with the pile itself being approximately 160 m in diameter. For reference the length of the jacket is approximately 97 m. Therefore, 100% of the pile is located within 100 m from the centre of the platform.</p> <p>A profile view of the cuttings pile, where the bulk of the pile is located has been provided. Further information is presented in the ES.</p>	Environmental Statement
Environment	<p>Collection of drill cuttings samples should be based on sediment cores as well as surface sediment grabs ensuring a better understanding of the historical distribution of contaminants and the biogeochemical recovery of surface sediments over time.</p>	<p>Sampling of the pile was undertaken by sediment cores with surface grab samples taken of the sediment contamination on the outer edge of the pile.</p>	Environmental Statement
Environment	<p>Noted that the decommissioned works will be phased and queried how CNRI intend to take into consideration the cumulative consequences of each decommissioning stage. Has consideration been given to the influence this approach would have on decommissioning options for future stages?</p>	<p>The cumulative consequences of decommissioning NNP in phases (i.e. the potential legacy issues and their influence on later stages of the project including wider field decommissioning) are presented in the ES.</p>	Environmental Statement

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
<p>Environment</p>	<p>Not all receptors that could be impacted have been considered in relation to each listed activity during the EIA scoping. Recommendation that CNRI identifies every receptor for which there is a possible impact receptor pathway, and then provide suitable justification as to why some impacts will not require further assessment.</p>	<p>CNRI have reviewed and ensured consideration of all significant receptors within the EIA scoping report. The CA report includes a risk based assessment where each activity has been listed and the impact on each receptor assessed. Key issues were assessed in further detail in the ES.</p>	<p>Comparative Assessment Report; Environmental Statement</p>
<p>Environment</p>	<p>In relation to marine growth, accounting for the following points raised:</p> <ul style="list-style-type: none"> - Annex I of the Habitats Directive makes it clear the habitats listed for protection should be natural, so we consider that any marine growth on the infrastructure does not need to be considered by itself under the Habitats Directive. - An assessment of whether the decommissioning operations impact any other natural <i>L. pertusa</i> that may be occurring around the infrastructure. - Within OSPAR documents on <i>L. pertusa</i> reefs, there is no such clarification as to whether the features have to be naturally occurring instances to be considered as Threatened & Declining habitat. Therefore we would suggest that CNRI assesses impacts against the Threatened & Declining habitats. 	<p>The ES shows survey video footage that indicates that there are <i>L. pertusa</i> colonies present on NNP; however the presence of <i>L. pertusa</i> has not been detected in the environment surrounding the platform.</p> <p>These colonies are artificial aggregations due to the presence of the platform and as such are not deemed to be natural occurring reefs. These aggregations are found on the footings; as a result, these will be preserved with the decommissioning of the footings in situ.</p>	<p>Environmental Statement</p>

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Environment	<p>EIA scoping report was unclear in instances where suitable mitigation had been identified and how the mitigation lowered the level of environmental impact, and if CNRI considers impacts which have been mitigated requiring further investigation in the EIA Process.</p> <p>Clarification required as to how the mitigation relates to the suggested scale of impact and further clarification is given in the scoping report on the role mitigation plays in determining the scale of impact.</p>	<p>The mitigation proposed has not been used to determine the level of impact, i.e. the impact that has been assigned during the desktop and workshop session is without mitigation measures in place. The reason for putting in the ‘mitigation proposed’ in the EIA scoping report is to identify these for impacts ascertained to be of significant risk.</p>	<p>Not applicable</p>
Environment	<p>Alternative methods of conducting the well plug & abandonment campaign and their potential environmental impacts should be considered in the ES, or if CNRI consider it more appropriate in the CA.</p>	<p>CNRI do not consider it appropriate to assess the alternatives to well P&A methods in the CA, as the CA is for the decommissioning the drill cuttings and jacket. There are limited options for the P&A method and the environmental impacts associated with these are described in the ES.</p>	<p>Environmental Statement</p>
Environment	<p>Any technically viable options for complete or partial removal of the jacket should be considered within the ES. For example if CNRI want to consider the use of explosives to assist in decommissioning the NNP then this should be considered in the environmental assessment process and be incorporated into any noise modelling.</p>	<p>The proposed methods for jacket removal are described fully in of the ES. The current project scope will cover all cutting options and where explosives are proposed, a full assessment will be made.</p>	<p>Environmental Statement</p>
Environment	<p>A realistic worst case scenario should be used to assess each of the proposed decommissioning options in the ES.</p>	<p>The decommissioning options are discussed in detail in the ES.</p>	<p>Environmental Statement</p>

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Environment	It is unclear from the EIA scoping report if any of the proposed decommissioning options could require the laying of rock for protection purposes.	No rock-placement will not be required for the proposed decommissioning operations as this Decommissioning Programme will only consider the jacket, topsides and drill cuttings pile. It is proposed that the surrounding subsea infrastructure and pipelines is accounted for under a separate decommissioning programme. Pipelines will be cleaned and made safe.	Decommissioning Programme
Environment	Recommendation that the ES includes information that was used to inform the drill cuttings modelling is discussed, including the model's assumptions and limitations.	The ES includes information on the model and further information regarding samples taken from the cuttings pile that were used to inform the model. Assumptions have not been presented in the ES but are available as a separate report upon request.	Environmental Statement; Drill Cuttings Environmental Assessment
Environment	Full results of the pre-decommissioning environmental baseline survey and any other relevant surveys should be presented and discussed in the ES and the results are used to help justify any relevant impact assessment conclusions.	The relevant components of the baseline survey are presented in the ES, a copy of the baseline survey has been provided.	Environmental Statement
Environment	A complete cumulative assessment should be included in the ES. This should consider the cumulative impacts of the proposed decommissioning options on key receptors such as birds, marine mammals and benthic habitats, as well as oil and gas operations and other industries operating in the marine environment.	A cumulative assessment has been included in the ES and where information is available, consideration is made to the interaction with other oil and gas operations and industries.	Environmental Statement

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Environment	<p>Noted that subsea assets will remain in situ until wider field decommissioning occurs.</p> <p>Require clarification as to when CNRI expect the wider field to undergo decommissioning and suggest that any potential cumulative impacts associated with the decommissioning of the NNP, and the wider field are fully considered in the ES.</p>	<p>Wider Ninian field is currently planned for 2032. The cumulative impacts of decommissioning all the Ninian platforms are accounted for in the ES.</p>	Environmental Statement
Environment	<p>Recommendation that timescales are communicated for the proposed operations in the ES, alongside the longevity of any impacts discussed.</p>	<p>Timescales at the stage of writing the EIA scoping report were still to be determined. Timescales are expanded upon in the ES, in addition to the longevity of impacts.</p>	Environmental Statement
Environment	<p>Extent of seabed that will potentially be disturbed needs to be estimated once the final decommissioning options for the NNP have been agreed. Recommendation that CNRI estimates the area of seabed expected to be disturbed and the potential impacts that will have on the benthic communities and expected recovery times are given some consideration before the CA is completed.</p>	<p>Estimates of the area of seabed expected to be disturbed are discussed as part of the ES.</p> <p>The CA considered the removal of the jacket and the drill cuttings pile and accounted for any disturbance to benthic communities from these activities, conducted as a qualitative assessment.</p>	Comparative Assessment Report
Environment	<p>Recommendation that CNRI consider partial removal of the cuttings pile within the CA.</p> <p>Recommendation that CNRI also considers leaving the entire steel jacket in place within the CA.</p>	<p>The options considered within the CA were partial and full removal of the jacket along with options for managing the drill cuttings pile that include leave in situ, excavation, treatment and disposal either onshore or offshore, and excavation and re-distribution offshore. Leaving the entire jacket in place is not compliant with current legislation.</p>	Comparative Assessment Report

CATEGORY	STAKEHOLDER ISSUE/EXPECTATION	COMMENT ON HOW THIS IS BEING ADDRESSED	WHERE IS THIS DETAILED?
Environment	Would like to understand how far from NNP the contamination from the drill cuttings pile extends, in the event that fishermen were allowed to enter close to the structure, they could potentially contaminate their catch. Also more information with regards to the thickness and dispersity of the drill cuttings pile.	Detailed information was provided. In addition, the information was reflected in the ES.	Environmental Statement
Environment	An informal response was received from Greenpeace, stressing the adverse effects on the environment of the drill cutting pile and the importance for the consideration of its full removal.	CNRI acknowledge Greenpeace’s concerns.	Not applicable
Environment	Cumulative impacts of multiple projects and the long term impacts of these needs to be considered.	Cumulative impacts of decommissioning the whole Ninian Field were assessed in the ES.	Environmental Statement
Environment	Ensure that management of waste is presented in detail and includes commitments to how the company will appropriately manage waste	Detail on waste management, Duty of Care and how CNRI will ensure that waste is managed appropriately is in the ES.	Environmental Statement
Environmental	Interested to hear more about any proposed monitoring plans for the structures that would assist understanding of their interaction with the marine environment.	Long term monitoring in terms of post-decommissioning surveys would be agreed with BEIS, in terms of their scope and frequency.	Environmental Statement; Decommissioning Programme