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**Acknowledgements**

The Scottish Fishermen’s Federation would like to thank the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), which sits within the Department of Business, Energy and Industrial Strategy (BEIS), for references taken from the “Guidance Notes on Decommissioning of Offshore Oil and Gas Installations and Pipelines (May 2018)” document, the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Limited (FLTC) for references taken from the Memorandum of Understanding document, and the OSPAR Commission for references from the 2015 Update of the Inventory of Offshore Installations.

Thanks also to David Linkie (Fishing News), and Philip Stephen for photographs used throughout the document.
The Scottish Fishermen’s Federation

The Scottish Fishermen’s Federation (SFF) was formed in 1973 to preserve and promote the collective interests of Scottish fishermen’s associations.

The Federation plays an active role in advancing the interests of Scottish fishermen at national and international levels by lobbying government officials in Edinburgh, London and Brussels. The Federation also plays a key role in helping to inform: fisheries science; the management of the marine environment; inshore fisheries management; marine spatial planning; marine safety regulations and industry recruitment and training programmes.

The Federation umbrella covers eight geographical/sectoral constituent associations representing around 400 vessels from inshore creel boats to pelagic trawlers.

Our key aims are:

- preserving and promoting the collective interests of the Scottish Fishermen’s Federation constituent associations
- ensuring a viable and sustainable future for the fleet in terms of both economics and environmental responsibility
- working to improve the perception of the fishing industry, attracting new entrants and ensuring professional standards of training and safety

“...the membership of the Scottish Fishermen’s Federation comprises representation across the whole spectrum of the Scottish fishing fleet...."
Oil and Gas Decommissioning in the United Kingdom Continental Shelf (UKCS)

The Scottish Fishermen’s Federation’s overarching principle in relation to oil and gas decommissioning in the United Kingdom Continental Shelf (UKCS), is to seek a return to clean seabed so far as is practicable to ensure a safer working environment for the wider fishing industry. This policy has been formulated taking into account current legislation, related guidelines and the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Limited (FLTC) Memorandum of Understanding.

The SFF has a duty to look after the interests and well-being of its members. This is best achieved by engaging and looking to work constructively with interested parties.

When oil and gas exploration and development commenced in the North Sea (granted under temporary access), operators pledged that once all the oil and gas had been extracted, oil and gas infrastructure would be removed and the seabed would be returned to natural condition. Whilst it is accepted that the legal position now allows for some derogation from this position, the SFF would not support any further extension to these exceptions.
Our policy has the following priorities at its centre:

- minimising health and safety risks to fishermen now and in the future, applying the precautionary principle;
- minimising risk of loss of vessels and gear by reducing snagging risks, both immediate and as infrastructure breaks up over time;
- minimising the area lost to fishing in perpetuity;
- minimising environmental risks taking account of threat of pollution and risk of contamination of catch;
- seeking to ensure adequate compensation through appropriate channels for any and each of the following:
  (i) any damage or loss of fishing gear,
  (ii) loss of access to fishing grounds, both temporary and perpetual, and/or
  (iii) future safety risks (including contamination to catch) as a result of derogated or remaining infrastructure, particularly drill cuttings;

and the provision of simple mechanisms for applying the polluter pays principle.

“Operators pledged that once all the oil and gas had been extracted oil and gas infrastructure would be removed, and the seabed would be returned to its natural condition...”
Our policy with regard to the decommissioning of various elements of oil and gas infrastructure can be summarised as follows:

Surface installations:

**Total removal to shore.** Failing that (and where a derogation against the Oslo and Paris Commission for the Protection of the Marine Environment of the North East Atlantic (OSPAR) Decision 98/3 has been granted); the preference is for seabed footings (minimum water clearance of 55 metres required above any partially removed installation which does not project above the surface of the sea) rather than for any part of the installation to be left visible above the water line (statutory Safety Zone/oil and gas decommissioned Awareness Zone implications to be considered).

Subsea installations:

**Total removal to shore.** Failing that; trenching and burial.

Pipelines & flowlines (including trunk lines, pipeline bundles and umbilicals):

**Total removal to shore.** Failing that; trenching and burial with a proactive monitoring programme put in place. With regard to pipeline ends, where a trenched and buried pipeline is cut and removed at the point where it previously emerged from the trench to tie-in to a subsea installation, preference is for burial along with an element of rock dump returning to mean seabed level.
Drill cuttings:
In each instance we require to know the size of the cuttings pile and representative evidence of its contents. On a case by case basis, fishermen’s representatives should be informed of the consequences of interaction with fishing gear and the possible effects on the resultant catch. In general:

• **more research is required** to determine whether, and if so when, it is deemed safe for fishermen to tow in the vicinity of drill cuttings. Even if no safety risk can be guaranteed; is there still a health risk through contamination of the catch?

• **compensation should be provided** for loss of access to fishing grounds until technology allows for drill cuttings to be removed safely.

• drill cuttings left in situ require to be **clearly marked** (especially when drill cuttings alone are remaining on the seabed).

Abandoned Wellheads in open water:
As a matter of best practice, it is the SFF’s recommendation for fishing trawl sweeps to be undertaken out to 500m of abandoned wellhead sites in open water to provide assurance that it is safe for fishing operations to resume at said locations.

Concrete mattresses:

**Total removal to shore.** Both concrete mattresses and grout bags present a significant snagging risk. However, if mattresses can be used as a practical part solution to a ‘fill in’ problem within the field and provided there are no contamination concerns, then this may be acceptable to the SFF. It is noted that, as per current Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) Guidance, once the protection duty requirement for which such items were originally installed ceases, then they are deemed no longer required, and should be considered for removal with the aim to achieve a clear seabed and for disposal onshore.
Remaining Subsea Structures - Legacy and Liability

Our expectation is that operators will provide a legacy and liability management plan for all issues (survey, sampling, monitoring and mitigation). The plan needs to address how any remaining items of oil and gas infrastructure will be marked for fishermen’s safety (review Consent to Locate (CtL) navigation risk assessment).

Where derogations from total removal are granted it is essential that remaining subsea structures are marked and identifiable to fishermen.

Rigs to Reef

SFF cannot support this scientifically unproven concept. Any possible benefits to fish stocks are viewed as minimal in relation to the sizes and geographical distribution of North Sea and West of Scotland fish stocks. It is also noted that infrastructure may first need to be brought to shore and cleaned (to be deemed to be free from contamination) in which case, a clean seabed is preferred.

Pipeline Gates

It should be noted that the concept of ‘pipeline gates’ relates only to the smoothing out of mud berm spoils which may occur from trenching and burial operations associated with the installation of pipelines and flowlines. The SFF does not advocate the creation of ‘pipeline gates’ along any proud pipeline/flowline route by the cutting and removal of sections of pipeline/flowline – it is the view of the SFF that such action would increase snagging risk to fishermen.
Verification Trawl Sweeps

As part of an oil and gas operator’s Field Decommissioning Programme, the SFF requires that a full trawl sweep survey campaign is undertaken upon completion of the OPRED approved decommissioning programme schedule to provide assurance that it is safe for fishing operations to resume at said location.

The trawl sweep survey will look to verify that:

(i) all subsea equipment and any associated debris pertaining to that Field have been removed, and/or
(ii) any mitigation work has been undertaken to agreed industry standards (i.e. in respect of trench and burial operations, rock placement, etc.).

The verification trawl sweeps should be undertaken utilising an appropriate national fishing federation (SFF for Scottish sector of UKCS, and the National Federation of Fishermen’s Organisations (NFFO) for English sector of UKCS) constituent association vessel after which the relevant Federation will either issue a Clearance Certificate or a Foul Certificate depending on the results of the survey programme.

It should be noted that the SFF will not consider or issue a Clearance/Foul Certificate based on the results of trawl sweeps conducted using a vessel not in membership of one of its constituent associations.
Surface to Subsea

Transitional phased approach to decommissioning infrastructure (surface to subsea)

For transitional cases where a surface 500 metre Safety Zone is no longer in force (due to topsides, Floating Production, Storage and Off-take Vessel (FPSO), installation legs, etc. no longer being in situ above the waterline), an operator may apply for a subsea 500 metre Safety Zone until all the associated subsea infrastructure has been removed.

The SFF understands the reasoning behind this interim measure and would strongly recommend that guard vessel services are also utilised during the transitional decommissioning phase for such reasons as:

- the possibility of the watch keepers on a fishing vessel presuming that, with the surface obstruction gone, any associated subsea infrastructure has also been removed
- fishing gear snagging concerns in relation to any anchor moorings’ scarring associated with the former surface installation facility (e.g. from the former Floating Production Facility (FPF), FPSO, Floating Storage Unit (FSU), etc.)
- potential timing gap between when a subsea safety zone is granted and the time the information reaches the fishing fleet (e.g. via the current 6 monthly FishSAFE information data roll out)

In relation to the aforementioned application for a subsea 500 metre Safety Zone, the SFF feels that any such approval should be time limited.

“...technology developments may significantly affect future decommissioning programmes as innovation could allow for return to clean seabed.”
Current and Future

Current and future stakeholder involvement

Comparative Assessments (CA)
SFF will always do its best to attend an Operator’s Stakeholder Engagement Comparative Assessment session. However, it should be noted that where the SFF is unable to provide a representative to attend a CA, the SFF’s Key Principles document and its content will be considered the SFF’s minimum input to that particular CA.

Technology Development
SFF will keep a watching brief on technology developments in relation to how this might affect future decommissioning programmes; and particularly how innovation could allow for return to clean seabed with significant cost savings. The availability and development of technology is central to the scope of a decommissioning project. Knowledge of methods and associated equipment available to operators can help determine the viability of a recommended option for decommissioning.

Fishing Awareness Sessions
As a matter of good practice, it is the SFF’s view that from the outset of any decommissioning programme, the operator’s project team should meet with the fishing industry to obtain an overview of the level and types of fishing activity that is likely to occur in the locality of the field being decommissioned.

“From the outset of any decommissioning programme, operators should meet with the fishing industry to obtain an overview of fishing activity in the proposed area...”
Legislation/Guidelines relevant to SFF Policy

Relevant legislation/guidelines to note, that are likely to effect the SFF’s policy include:


The decommissioning of offshore oil and gas installations and pipelines on the United Kingdom Continental Shelf (UKCS) is controlled through the Petroleum Act 1998, as amended by subsequent Energy Bills.

The UK’s international obligations on decommissioning are governed principally by the 1992 Convention for the Protection of the Marine Environment of the North East Atlantic (OSPAR Convention). Agreement on the regime to be applied to the decommissioning of offshore installations in the Convention area was reached at a meeting of the OSPAR Commission in July 1998.

The responsibility for ensuring that the requirements of the Petroleum Act 1998 and international obligations are complied with rests with the Offshore Petroleum Regulator for the Environment and Decommissioning (OPRED) which sits within the Department of Business, Energy and Industrial Strategy (BEIS), formerly the Department for Energy and Climate Change. OPRED is also the competent authority on decommissioning in the UK for OSPAR (international regulations) purposes.

The current BEIS/OPRED Guidance Notes align with **OSPAR Decision 98/3**.

“...any pipeline bundles installed after June 1999 should be designed for future removal.”
This policy applies to pipeline bundles which are already on the seabed. OPRED would, however, expect that any pipeline bundles installed after June 1999 should be designed for future removal.

**SAFETY**
under residual risk to other users of the sea

**SOCIETAL**
under commercial impact on fisheries

Although Pipelines currently do not fall within the remit of OSPAR Decision 98/3, the Guidance Notes state that the principles and processes associated with OSPAR 98/3 have been adopted in consideration of the decommissioning of pipelines.

It should be noted that because of the widely different circumstances of each case, OPRED do not predict with any certainty what decommissioning strategy may be approved in respect of any class of pipeline. Each pipeline must therefore be considered on its merits and in the light of a CA of the feasible options, taking into account the safety, environmental, technical, societal and economic impacts of the options. It is stated that cost may only be a determining factor when all other criteria emerge as equal.

**OSPAR Convention and OSPAR Decision 98/3**

Under the OSPAR Decision 98/3, which has been accepted by the UK Government, the disposal at sea and the leaving wholly or partly in place of disused offshore installations is prohibited. There is a presumption in favour of re-use, recycling or final disposal on land.

The Decision recognises that there may be difficulty in removing ‘footings’ of large steel jackets weighing more than 10,000 tonnes and in removing concrete installations. As a result there are exceptions from the general rule for these categories of installation. However, it should be noted that any steel installation emplaced after 9 February 1999, the date on which the Decision entered into force, must be completely removed for re-use or recycling of final disposal on land.
The following table indicates the options which may be considered for various categories of offshore installations located on the UKCS:

<table>
<thead>
<tr>
<th>Installation (excluding topsides)</th>
<th>Weight (tonnes)</th>
<th>Complete removal to land</th>
<th>Partial removal to land</th>
<th>Leave wholly in place</th>
<th>Re-use</th>
<th>Disposal at sea</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fixed Steel &lt;10,000</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes (3)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Fixed Steel &gt;10,000</td>
<td>Yes</td>
<td>Yes (1) (2)</td>
<td>Yes</td>
<td>Yes (3)</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Concrete – Gravity</td>
<td>Any</td>
<td>Yes</td>
<td>Yes (2)</td>
<td>Yes</td>
<td>Yes</td>
<td>Yes (4)</td>
</tr>
<tr>
<td>Floating</td>
<td>Any</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Subsea</td>
<td>Any</td>
<td>Yes</td>
<td>No</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

(1) Only the ‘footings’ or part of the ‘footings’ may be left in place.
(2) Minimum water clearance of 55 metres required above any partially removed installation which does not project above the surface of the sea.
(3) The placement of materials on the seabed for a purpose other than that for which it was originally intended is covered by the OSPAR Guidelines on Artificial Reefs in relation to Living Marine Resources of June 1999 (OSPAR Ref: Agreement 1999-13. Available from OSPAR website).
(4) Although the disposal of the substructure of a concrete installation at a deep-water site is an option, this must be considered against the UK Government announcements at the time of the Decision when Ministers stated that there would be no toppling and no local or remote dumping of offshore installations.

In exceptional and unforeseen circumstances any disused offshore installation may be disposed at sea or left wholly or partially in place as a derogation from the main rule if it can be demonstrated that, due to structural damage or deterioration, or some other cause presenting equivalent difficulties, there are significant reasons why such disposal is preferable to re-use or recycling or final disposal on land. This derogation is likely to apply only in very exceptional cases where for significant environmental, technical or safety reasons an installation, or part of it, cannot be removed.

Every five years (since the Decision came into force in February 1999) OSPAR's Offshore Industries Committee (OIC) reviews Decision 98/3 and to-date this has focused on developments in technology, which could potentially reduce the number and scope of derogation applications.
Petroleum Act 1998

The decommissioning of offshore oil and gas installations and pipelines on the UKCS is controlled through the Petroleum Act 1998, as amended by the Energy Act 2008.

International Maritime Organisation (IMO) Guidelines

The IMO Guidelines and Standards for the Removal of Offshore Installations and Structures on the Continental Shelf and in the Exclusive Economic Zone, adopted by the IMO Assembly on 19 October 1989 (Resolution A.672(16)), set out the minimum global standards to be applied to the removal of offshore installations and structures.

Energy Act 2008

The Energy Act 2008 amends the Petroleum Act 1998 by strengthening the powers of the Secretary of State in relation to financial assurances.

Energy Act 2016; the Oil and Gas Authority (OGA) and its core functions

The Strategy for Maximising Economic Recovery of UK Petroleum (MER UK) created out of the Wood Review of 2013/14 led to the establishment of the Oil and Gas Authority (OGA) under the Energy Act 2016. Its purpose is to regulate, influence and promote the recovery of oil and gas in the UKCS; a key role within the MER UK Strategy being to ensure that decommissioning is undertaken in an as cost effective manner as possible and at the correct time. The Act established the OGA as an independent regulator and states that the OGA must be consulted before an abandonment programme is submitted to the Secretary of State. As part of the transfer of powers to the OGA, the OGA now has responsibility for Technology Development and Innovation matters.

Pipeline Safety Regulations 1996

Administered by the HSE, providing requirements for the safe decommissioning of pipelines.
FLTC is a registered charity established for the following purposes:

Objectives of the Company

The Company has been set up to receive and manage the Fisheries Legacy Trust Fund to offset negative legacy issues associated with oil and gas operations and post-decommissioning seabed residues (in particular concerning the safety of mariners). The Company has established funds and an organisation to manage ongoing issues by building on current operational information.

Primary Object – Safety

The primary object of the Company is to promote and enhance safety by taking steps to reduce the risk of loss of life, and/or injury of, or damage to, persons or property by reason of Legacy issues; principally by supporting and promoting, in whatever manner, both existing and future mechanisms to identify and monitor Legacy Issues, existing and potential, and seabed installations on the UK Continental Shelf, including the collection of data and the communication of the same to mariners (e.g. to fishermen via the FishSAFE units on board vessels and by other methods). The collection and distribution of data is undertaken by FLTC Services Limited (FLTCS), a subsidiary of FLTC.
Secondary Objects

In so far as there remains any surpluses not required for that primary object, as may be determined by the FLTC Board from time to time, the following secondary objects may be pursued by the Company:

- to advance education, science and environmental protection or improvement by funding or otherwise supporting or assisting studies, works, projects or schemes or by the exploitation of new technology or other initiatives in relation to the understanding and/or minimisation of Legacy Issues and/or the improvement, extension of life or preservation of the Relevant UK Fishery; and

- to support and encourage fishing industry safety initiatives generally.

Note: “Legacy Issues” – materials, equipment, plant, machinery or consumables whether attached to the seabed or not and of whatever nature, remaining after cessation or decommissioning of oil and/or gas drilling and/or exploration and/or production and/or ancillary activities in UK Waters and arising from, connected with, ancillary to or necessary for those activities or that cessation or decommissioning.

Funding - Expected levels of contribution by operators of installations/pipelines with remains on the seabed

It is intended that there should be initial contributions of:

- £750k per remaining steel structure
- £750k per remaining concrete structure
- £3k per kilometre of pipeline with exposed length*

These payments are subject to index linking from the date when they were agreed.

Note: * Pipelines that are trenched or buried, beneath the general surface of the seabed in that area, are not considered to be exposed. It is recognised that such pipelines may become exposed after a period of time. However, the contribution is made on the basis of the conditions at the time of the completion of the OPRED required decommissioning programme initial monitoring run.

“The primary object of the Company is to promote and enhance safety by taking steps to reduce the risk of loss of life, and/or injury of, or damage to, persons or property.”
Seabed monitoring - possible future activities of FLTCS in relation to residues from installations and pipelines after decommissioning

Seabed monitoring (subsea surveys) to be undertaken where appropriate to allow the FishSAFE Information System database to be updated to ensure that FLTCS is effective in providing information on the current status of seabed hazards. This will only be when thought necessary, and will be outside and distinct from any statutory monitoring requirements by OPRED, served on the operator/owner at the time of the decommissioning programme approval. For example, this may become necessary following a series of incidents in a particular area (reactive approach), to investigate the status and nature of the hazard or when an operator has ceased to exist. Items to be monitored could include:

**Steel Platform ‘stumps’**
- Monitoring of sites for decay of structure and degradation of cuttings piles
- Monitoring the location of debris/residues which move from the immediate site area
- Maintenance of information systems and any onsite marker e.g. transponder, buoy or other item

**Concrete Platform sub-structure**
- Inspection and monitoring of sites, surface and sub-surface, for decay of structure and degradation of cuttings piles
- Monitoring the location of debris/residues which move from the immediate site area
- Navigational aids maintenance

**Pipelines**
- Monitoring of sites for decay of pipelines
- Monitoring the location of debris/residues which move from the immediate site area

Note: FLTC cannot fulfil statutory requirements with respect to the monitoring of decommissioned oil and gas infrastructure. Therefore, the monitoring requirements noted above are separate from such statutory requirements and only those deemed appropriate by FLTC’s Board and after the explicit requirements of OPRED’s decommissioning programme have been fulfilled.

Any involvement by FLTCS in monitoring would be subject to satisfactory agreements regarding funding and the management of liabilities arising from such activities. FLTCS has to date made no commitment to undertake such work and engagement with other stakeholders has not taken place.
Statutory responsibilities of oil and gas infrastructure operators and owners following decommissioning:

- For all cases: an initial survey following decommissioning;
- Record this status with Hydrographic Office and others;
- After full removal of an installation – an initial environmental survey, usually followed by 1 or 2 additional surveys;
- Where part of an installation is left in place – monitoring for environmental impacts and hazards, potentially indefinitely, e.g. at NW Hutton, there will be a repeat survey 3-5 years on and then further surveys as required;
- Replacement & ongoing maintenance of navigation aids and the visual inspection of concrete structures left above sea level, e.g. at Frigg, owners were requested to visually inspect structures above the waterline, record any deterioration and report on possible consequences for the safety of other sea users;
- Where a pipeline is left in place – an initial survey plus follow-up in 3-8 years and further surveys as required, focusing on safety, i.e. checking for spanning, insufficient burial etc.;
- Ongoing legal liability.

Limitations on statutory monitoring information and where FLTCS can potentially help:

**Time:** Although individual subsea structures and pipeline surveys may be required indefinitely, these surveys may cease if the operator/owner no longer exists. (It is assumed that FLTCS monitoring would not arise until at least 10 years after decommissioning).

**Extent:** Legislative monitoring requirements must be reasonable and current guidance is for clearance surveys out to 500m around structures and 100m alongside pipelines (50m each side of pipeline). Debris outside these zones may not be identified. Also, where evidence is inconclusive as to the ownership or attribution of seabed hazards, it may be that the statutory responsibilities cannot be enforced. FLTCS could provide the means to cover this.

**Quality:** The current Hydrographic Office records have been found to be not always current, comprehensive or accurate (this is particularly true of pipelines, where in certain cases, it has been found that the records show the intended instead of the actual line).

**Access:** There is no statutory responsibility on operators/owners to keep other sea users informed pro-actively of subsea hazards in the way currently undertaken by FLTCS.
Offshore Installations (extract from OSPAR)

In the OSPAR maritime area, in particular in the North Sea, major developments in the oil and gas industry have resulted in a large number of offshore installations.

Since 1998 the dumping, and leaving wholly or partly in place, of disused offshore installations is prohibited within the OSPAR maritime area under OSPAR Decision 98/3 on the Disposal of Disused Offshore Installations. However, following assessment, the competent authority of the relevant Contracting Party may give permission to leave installations or parts of installations in place in the case of:

- steel installations weighing more than ten thousand tonnes in air;
- gravity based concrete installations;
- floating concrete installations;
- any concrete anchor-base which results, or is likely to result, in interference with other legitimate uses of the sea.

OSPAR monitors the development of offshore installations and maintains the OSPAR Oil and Gas Offshore inventory. The database includes the name and ID number, location, operator, water depth, production start, current status, category and function of the installations. At present more than 1350 offshore installations are operational in the OSPAR maritime area, most of them subsea steel installations and fixed steel installations. OSPAR Contracting Parties with oil and gas industry offshore installations are: Denmark, Germany, Ireland, the Netherlands, Norway, Spain and the United Kingdom.

www.ospar.org