

# OFFSHORE OIL AND GAS DECOMMISSIONING POLICY KEY PRINCIPLES

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The Scottish Fishermen's Federation (SFF) Offshore Oil and Gas Decommissioning Policy explains that **a return to clean seabed is the SFF's overarching principle** in relation to oil and gas decommissioning in the United Kingdom Continental Shelf (UKCS), taking into account current legislation, related guidelines and the UK Fisheries Offshore Oil and Gas Legacy Trust Fund Limited (FLTC) Memorandum of Understanding.

The policy lists a number of central priorities. Our decommissioning **preferences with regard to the various elements of oil and gas infrastructure** (such as surface installations, subsea installations [e.g. manifolds and wellheads] and pipelines & flowlines [including trunk lines, pipeline bundles and umbilicals]) can be summarised as follows:



## Surface Installations: Total removal to shore

Failing that (and where a derogation against 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.



## Subsea Installations: Total removal to shore

Failing that; trenching and burial.

## Drill Cuttings

More research/clarification is required as to if, and when, it is deemed safe for fishermen to tow in the vicinity of drill cuttings. There should be **compensation for loss of access to fishing grounds** until technology allows for drill cuttings to be removed safely. We would require to know the size of the cuttings pile and representative evidence of its contents. What would be **the consequence of interaction with fishing gear** and the resultant catch?



## 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**, preference is for burial along with an element of rock dump.

## 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**.

## Verification Trawl Sweeps

SFF requires that a **full trawl sweep survey campaign** is undertaken upon completion of the OPRED approved decommissioning programme to provide assurance that it is safe for fishing to resume at said location.

## Technology Development

SFF will keep a watching brief on **technology developments** in relation to how this might affect future decommissioning programmes.



## 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.

## Legacy and Liability

Our expectation is that the operator will provide a **legacy and liability management plan** for all issues (survey, sampling, monitoring and mitigation).

Download the full document at [www.sff.co.uk](http://www.sff.co.uk)  
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