May 7th 2018

To the Danish Minister of the Environment and Food, Jakob Ellemann-Jensen

DECOMMISSIONING OF OFFSHORE INSTALLATIONS IN THE NORTH SEA

In mid-March, the Meeting of the Offshore Industry Committee (OIC), held under the auspices of the Oslo Paris Convention (OSPAR), performed their five-yearly review of the derogation rules related to the Disposal of Disused Offshore Installations (OSPAR Decision 98/3). This meeting concluded, once again, that there is no need for any substantial adaptations of the regulations for decommissioning of offshore installations. The next review will not take place until 2023.

North Sea Futures finds it incomprehensible that the recent OIC review does not in any way consider the growing body of scientific evidence on the ecological value of offshore installations - acting as highly productive, biodiverse and largely interconnected refuges for many species, including cod, lobster and corals and related – and related concerns about the potential impact of removing them. Nor does it consider the benefits of an expedient reallocation of public spending by taking a more flexible approach. Instead, the review focuses on returning the seabed back to its original state, before the structures were deployed 20-25 years ago, which many question whether is even possible, let alone if it is the better ecological and environmental option.

Therefore, we call for the Minister to make use of the upcoming OSPAR Commission Meeting and the Danish position as chair of the North Sea Energy Cooperation in 2019 to show support for the following activities to ensure they take place before the 2023 review:

- A thorough review of OSPAR Decision 98/3 and related regulations, incl. the criteria included in Environmental Impact Assessments, with a focus on how to ensure that the best environmental option for decommissioning is chosen, independent of the current derogation criteria;
- An assessment of what implications the current decommissioning regime will have on offshore wind farms and for the feasibility of 'nature-inclusive design' of wind farms;
- The development and implementation of pilot projects that focus on the repurposing of offshore installations, including wind farms, with the aim of restoring specific habitats or supporting the conservation of vulnerable and threatened species.

Under the current OSPAR 98/3 regulations, approximately 1500 existing oil and gas installations, and potentially 20,000-25,000 existing and future wind installations will have to be removed from the North Sea over the coming decades. The economic costs to the public will be enormous and it is likely that the cumulative effect of removing these installations will have a significant impact on marine ecosystems. Moreover, the current policy may eventually delay the transition from non-renewable to renewable energy, by creating unnecessary conflicts between climate goals, marine conservation goals and fisheries interests. For example, nature restoration or the use of offshore wind

farms for multiple purposes, such as seaweed or shell fish production, will be much less attractive if co-uses and the developed ecosystems are disturbed by full removal practises every so-many years.

In 2017, North Sea Futures approached universities and marine experts in an unprecedented international survey on the environmental effects of various options for decommissioning offshore installations in the North Sea region. In total, 38 scientists from across the world contributed. The results showed that 94.7% of participants agreed that a more flexible case-by-case approach to decommissioning could benefit the North Sea environment. Partial removal options were considered to deliver better environmental outcomes than complete removal for oil and gas installations, and both approaches were equally supported for offshore wind farms. The survey participants identified key considerations for decommissioning, which included biodiversity enhancement, provision of reef habitat, and protection from trawling, all of which are negatively affected by complete removal.

The results of our survey, which will be published in Frontiers of Ecology and the Environment, and another International Green NGO survey, which focused on a more flexible model for decommissioning of offshore installations, were further discussed at a meeting held at The Danish Technological University (DTU) in September 2017, and resulted in the North Sea Futures Manifest 2017.

We consider that the OIC meeting earlier this year was as a lost opportunity to address these issues. However, we also recognize its conclusions about the need for more knowledge to be gathered and taken into account for the next OIC review. Therefore, North Sea Futures is currently assessing the opportunity to launch a multi-stakeholder initiative – *International Forum for Offshore Energy and Marine Ecosystems (IFOME)* – to increase our knowledge and understanding of decommissioning options. If sufficient support can be gathered, we consider IFOME could act as a valuable focal point where new knowledge is presented and discussed, and solutions can be found that support an energy transition in the North Sea that has environmental integrity and conservation at its core.

If this letter has raised your interest, we will of course be pleased to discuss our proposal further.

Yours sincerely,

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Director

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