



## KINSALE FIELD: APPLICATION FOR APPROVAL TO DECOMMISSION CERTAIN FACILITIES IN THE KINSALE HEAD AND BALLYCOTTON GAS FIELDS CONSENT NO. 3

### ENVIRONMENTAL ASSESSMENT (EIAR) REVIEW DETERMINATION

#### I. PROJECT PROPOSAL

By application dated 13<sup>TH</sup> October 2021, to the Minister for the Environment, Climate and Communications, PSE Kinsale Energy Limited hereafter referred to as (**PSE**) has sought Ministerial approval for:-

- An addendum to Plan of Development in accordance with Sections 13 and 13A of the Petroleum and Other Minerals Development Act 1960, as amended, to decommission certain facilities; and
- Consent under Section 5(2) of the Continental Shelf Act 1968, as amended, to alter certain facilities in a designated area

The Kinsale Head gas fields and facilities form part of the greater Kinsale Area gas fields and facilities. PSE is completing the decommissioning of the Kinsale Area gas fields and facilities, which have come to the end of their productive life, having been in production since 1978. The Kinsale Area gas fields and facilities are made up of (1) the Kinsale Head gas fields and facilities and (2) the Seven Heads gas field and facilities. Together, the decommissioning of the entirety of the Kinsale Area gas fields and facilities is collectively referred to as the Kinsale Area Decommissioning Project (KADP). The Kinsale Area gas fields and facilities are located in the Celtic Sea, between approximately 40 and 70km off the County Cork coast and onshore at Inch, Co. Cork.

There have been 2 previous consents issued on the KADP and this current consent No. 3 covers the decommissioning of certain facilities in the Kinsale Head and Ballycotton gas fields, located within the Kinsale Head Petroleum Lease area in offshore petroleum licensing Blocks 48/20, 48/25, 49/16 and 49/21. One of the consents referenced here also included activity in the Seven Heads area, and a further application is being made by a related company to the applicant (PSE Seven Heads Limited) in relation to decommissioning in Seven Heads gas field. The activities covered by the application are:

- To leave *in-situ* all infield pipelines and umbilicals associated with the Kinsale Head gas fields
- To leave *in-situ* the 24" export pipeline (offshore and onshore section) and to fill the onshore section with grout
- To use engineering materials (Rock Placement) to protect the pipelines and umbilicals in situ

Consent Application No. 3 has been submitted on the basis that none of the pipelines or umbilicals will be re-used.

This application covers only the facilities noted above and detailed in Decommissioning Plan - Kinsale Head Petroleum Lease - Consent Application No.3. The previous Consent Application No. 1 covered the removal of the two platform topside structures, the plugging and abandonment of wells and the removal of subsea facilities in the Kinsale Head and Seven Heads gas fields . . Consent Application No. 2 covered the removal of the Kinsale Alpha and Bravo jackets. This application covers the remaining facilities to be decommissioned.

## **II. DECC ASSESSMENT PROCESS**

The Environment Assessment Unit (**EAU**), a functionally separate and independent unit of the Department of the Environment, Climate and Communications (**DECC**) is responsible for carrying out environmental screening and any environmental assessments determined as being required following screening, in accordance with the requirements set out in Directive 2011/92/EU, as amended by Directive 2014/52/EU (**EIA Directive**) and Directive 92/43/EEC, as amended, (**Habitats Directive**), in the context of applications within an existing petroleum lease (such as the present **PSE** application) that seek Ministerial approval to conduct a programme of works in relation to an existing offshore gas pipeline and associated infrastructure.

EIA – In Ireland, environmental assessments of such applications are carried out by the EAU in accordance with the EIA Directive. Where the activities the subject of the application fall outside the projects listed in Annex I of the EIA Directive, an EIA Screening Assessment and Determination is carried out by the EAU in the first instance, as to whether the activities the subject of the application would, or would not, be likely to have significant effects on the environment by virtue, *inter alia*, of their nature size and location. Where it has been determined, following screening, that the activities the subject of the application, are likely to have significant effects on the environment, an environmental impact assessment is required.

AA / Habitats Assessments – The European Communities (Birds and Natural Habitats) Regulations 2011 – 21 (S.I. 477 of 2011, as amended) (**Birds and Natural Habitats Regulations**) give effect to the Habitats Directive as a matter of Irish law and require, *inter alia*, that a public authority carry out screening for Appropriate Assessment of a plan or project for which an application for consent is received. Where a public authority determines, following screening, that an Appropriate Assessment is required, the Birds and Natural Habitats Regulations require that the assessment carried out by a public authority include a determination pursuant to Article 6(3) of the Habitats Directive as to whether or not the plan or project would adversely affect the integrity of a European site. The EAU is responsible for carrying out Stage 1 AA screening assessments, and any Stage 2 Appropriate Assessment determined as being required following screening, in accordance with the Birds and Natural Habitats Regulations, in respect of applications, such as this one, to carry out works including decommissioning in relation to an existing offshore gas pipeline and associated infrastructure.

On receipt of an application, the Geoscience Regulation Office (**GSRO**) – previously the Petroleum Affairs Division – in DECC places the application on the DECC website for public consultation and refers the application, and any associated responses to the consultation, to the EAU for the purposes of carrying out its environmental assessments.

On the completion of all environmental assessments by the EAU and after incorporating any suggested conditions which may be recommended by the EAU, the application will then be evaluated by the GSRO in the Department who will make a recommendation to the Minister regarding whether consent should be given for the activities applied for.

### **III. INDEPENDENT EXPERT ADVISORS**

DECC has further engaged Ramboll UK Limited (herein referred to as **Ramboll**) as independent expert environmental advisors to provide advice to the EAU with regard to the carrying out of statutory environmental assessments of applications for permission to carry out works within an existing petroleum licence, such as the present application by PSE.

Ramboll has conducted an independent assessment of the information provided by PSE, by reference to the relevant selection criteria in the EIA Directive. The expert report prepared by Ramboll, having carried out an external review of the Environmental Impact Assessment Report (EIAR) submitted by PSE is shown at Appendix 1 ("**Ramboll Report**").

### **IV. ENVIRONMENTAL IMPACT ASSESSMENT SCREENING: LEGISLATIVE BACKGROUND**

The EIA Directive (Directive 2011/92/EU, as amended by Directive 2014/52/EU) requires that projects that are likely to have significant effects on the environment by virtue, *inter alia*, of their nature, size or location are made subject to an environmental impact assessment.

Under Article 4 of the EIA Directive, projects listed under Annex I are automatically subject to an environmental impact assessment and for projects listed in Annex II, Member States shall determine whether the project shall be subject to an assessment and can make the determination through either one of both (a) case by case examination or (b) thresholds set by the Member State.

The applicant submitted an EIAR with the application and DECC's EAU having considered the EIA Directive consider that the proposal is covered under section 24 of Annex 1 of the Directive, which includes "Any change to or extension of projects listed in this Annex where such a change or extension in itself meets the thresholds, if any set out in this Annex". As the original consents fell under Annex 1, this application can be considered a change to or extension of an Annex 1 project. DECC's EAU agrees with the applicant that an EIAR is required.

Article 5.1 of the amended EIA Directive provides that the application shall at least provide the following: -

- description of the project comprising information on the site, design, size and other relevant features of the project;
- description of the likely significant effects of the project on the environment;
- description of the features of the project and/or measures envisaged in order to avoid, prevent or reduce and, if possible, offset likely significant adverse effects on the environment;
- a description of the reasonable alternatives studied by the developer, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment;
- a non-technical summary of the information referred to in points (a) to (d); and
- any additional information specified in Annex IV relevant to the specific characteristics of a particular project or type of project and to the environmental features likely to be affected.

The EPA have updated their Guidelines on the Information to be contained in Environmental Impact Assessment Report in 2022 and regard has been had to this and other relevant guidance.

## **V. PSE APPLICATION: ASSESSMENT PROCESS**

PSE submitted the following documents with the application submitted in November 2020 (along with a cover letter):-

- (i) Kinsale Area Decommissioning Project Environmental Impact Assessment Report. Volume 1: Non-Technical Summary. 30 May 2018. Ref 253993-00-REP-08;
- (ii) Kinsale Area Decommissioning Project Environmental Impact Assessment Report. Volume 2: Main Text: Part 1 of 3. 30 May 2018. Ref 253993-00-REP-08;
- (iii) Kinsale Area Decommissioning Project Environmental Impact Assessment Report. Volume 2: Main Text: Part 2 of 3. 30 May 2018. Ref 253993-00-REP-08;
- (iv) Kinsale Area Decommissioning Project Environmental Impact Assessment Report. Volume 2: Main Text: Part 3 of 3. 30 May 2018. Ref 253993-00-REP-08;
- (v) Kinsale Area Decommissioning Project Environmental Impact Assessment Report. Volume 3: Appendices: Part 1 of 2. 30 May 2018. Ref 253993-00-REP-08;
- (vi) Kinsale Area Decommissioning Project Environmental Impact Assessment Report. Volume 3: Appendices: Part 2 of 2. 30 May 2018. Ref 253993-00-REP-08;
- (vii) Kinsale Area Decommissioning Project Environmental Impact Assessment Report Addendum. 24 August 2019. Ref 253993-00-REP-24
- (viii) Kinsale Area Decommissioning Project Environmental Impact Assessment Report Addendum No. 2. 30 September 2021. Ref 253993-00-REP-27;
- (ix) Letter to Minister. Kinsale Head Plan of Development. Dated 13 October 2021;
- (x) Kinsale Area Decommissioning Project. Decommissioning Plan – Kinsale Head Petroleum Lease (OPL1) Consent Application No. 3. Dated 30 September 2021. Ref 253993-00-REP-28.
- (xi) Kinsale Area Decommission Project. Environmental Impact Assessment Report Addendum Report No. 3. January 2022

### **V.1 Notified Bodies**

Notification of the PSE application was issued to the following organisations:

- National Parks and Wildlife Service, (Department of Housing, Local Government and Heritage);
- Cork County Council;
- Office of Public Works;
- Minister for Agriculture, Food and the Marine;
- Health and Safety Authority;
- Bord Iascaigh Mhara,
- The Environmental Pillar;
- The Heritage Council;
- An Taisce;
- Minister for Tourism, Culture, Arts, Gaeltacht, Sports and Media);
- Minister for Rural and Community Development;
- Minister for Transport;
- Sea Fisheries Protection Authority;
- The Irish Whale and Dolphin Group
- Marine Institute
- Environmental Protection Agency

Four responses to the notification were received from (1) the Sea Fisheries Protection Authority dated 3<sup>rd</sup> November, 2021, (2) Department of Transport - GCU - Reform Communications and Emergency Planning Division dated 17<sup>th</sup> November, 2021 who informed us that they had no observations, (3) the Irish Whale and Dolphin Group dated 17<sup>th</sup> November, 2021, and (4) the Department of Housing, Local Government and Heritage dated 31<sup>st</sup> December, 2021.

The notified bodies' responses received (including the project specific observations) are shown in the Ramboll Report at Appendix 1 (Section 2.4.1).

## **V.2 Initial Public Consultation**

The PSE application and accompanying documents were published on the Department website on 14<sup>th</sup> October 2021 and the public invited to make submissions thereon during a 30 day public consultation period ending on 17<sup>th</sup> November 2021. Four responses were received from the public in response to the public consultation on the PSE application as follows:-

1. Response from Simply Blue Energy dated 17<sup>th</sup> November, 2021
2. Response from dCarbonX Ireland Ltd dated 15<sup>th</sup> November, 2021
3. Response from SLR Consulting Ireland on behalf of Mag Mell Energy Ireland Ltd dated 11<sup>th</sup> November, 2021
4. Response from SLR Consulting Ireland on behalf of Predator Oil and Gas Holdings Plc dated 11<sup>th</sup> November, 2021

Following a review of their application PSE submitted additional information which was published on the Department website. The public were invited to make further submissions during the period 31<sup>st</sup> January 2022 to the 7<sup>th</sup> March, 2022. One response was received as follows:-

1. Response from Not Here Not Anywhere dated 7<sup>th</sup> March, 2022.

The consultation responses received (including the project specific observations) are shown in the Ramboll Report at Appendix 1 (Section 2.4.2).

## **V.3 Further Information Received and Supplemental Consultation**

Having reviewed the PSE application and accompanying documents and the submissions received, Ramboll recommended that further information be obtained from PSE in relation to their application on the basis that further clarification was sought so that an EIAR assessment can be made in respect of the proposed activities involved in the PSE application. Adopting that recommendation, specified additional information was sought by the EAU from PSE on 11<sup>th</sup> April, 2022. The Department website was updated to reflect the position and consultees were informed of the decision to request further information.

On 25<sup>th</sup> April 2022, the applicant responded by submitting further information to address the DECC queries, and the adequacy of the applicant responses were assessed in conjunction with Ramboll and on 26<sup>th</sup> April 2022, the supplemental information received from the applicant was posted on the Department website for comment by 10<sup>th</sup> May 2022. Two further responses were received from the EPA dated 10<sup>th</sup> May 2022 and the Department of Transport - GCU - Reform Communications and

Emergency Planning Division dated 5<sup>th</sup> May 2022 who informed us that they had no observations. Any points raised have been considered as part of the EIAR assessment process.

The observations made in the submissions received during the supplemental public consultation are also shown in Section 2.4 of the Ramboll Report. General consultation responses, and project specific responses on policy are shown in Appendix A and B respectively, and project specific consultation responses are shown in table 2.1, which are all in the Ramboll Report (at Appendix 1 to this Determination).

## **VI. PSE APPLICATION: EIAR ASSESSMENT AND DETERMINATION**

In carrying out the EIAR Assessment of the PSE application in accordance with EIA Directive, I have carefully considered the information contained in the following documents:-

- Documents provided by the Applicant:
  - Application Letters ( 13<sup>th</sup> October, 2021 and 27<sup>th</sup> January 2022)
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Volume 1 Non-Technical Summary. 30 May 2018. Ref 253993-00-REP-08 ;
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Volume 2 Main Text Part 1 of 3 30 May 2018. Ref 253993-00-REP-08;
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Volume 2, Main Text Part 2 of 3, 30 May 2018. Ref 253993-00-REP-08;
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Volume 2 Main Text Part 3 of 3, 30 May 2018. Ref 253993-00-REP-08;
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Volume 3 Appendices: Part 1 of 2. 30 May 2018. Ref 253993-00-REP-08
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Volume 3 Appendices: Part 2 of 2. 30 May 2018 Ref 253993-00-REP-08;
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Addendum 24 August 2019. Ref 253993-00-REP-24
  - Kinsale Area Decommissioning Project Environmental Impact Assessment Report Addendum No. 2. 30 September 2021. Ref 243993-00-REP-27
  - Kinsale Area Decommissioning Project. Decommissioning Plan. Kinsale Head Petroleum Lease (OPL1) Consent Application 3 dated 30 September. Ref 253993-00-REP-28
  - Kinsale Area Decommissioning Project. Environmental Impact Assessment Report Addendum No. 3. January 2022
  
- EIAR Review for Kinsale Area Decommissioning Project Consent Application prepared by Ramboll (**Ramboll Report**, included at Appendix 1);
  
- Responses received from public consultation: Four responses from the public as detailed at Part V.2 and four responses from the prescribed bodies as detailed at Part V.1 above and a submission from the Irish Whale and Dolphin Group
  
- Response to the supplementary consultations: Three responses were received from Not Here Not Anywhere (dated 7<sup>th</sup> March 2022), the EPA (dated 10<sup>th</sup> May 2022) and Department of Transport (dated 5<sup>th</sup> May 2022).

In carrying out an EIAR Assessment of the PSE application all of the above documents and information was considered to order to make a reasoned conclusion as to the adequacy of the information provided to enable a consent decision.

As evidenced in the Ramboll Report, when carrying out their assessment of the decommissioning project as described in the PSE application, Ramboll considered the different project elements by reference to the EIA Directive and EU Guidance *on the preparation of the Environmental Impact Assessment Report* (EU, 2017 and the EPA Guidelines on the Information to be contained in Environmental Assessment Reports 2022).

In this context the following elements were considered:

- Description of the project - comprising information on the site, design, size and other relevant features of the project
- Description of the environment likely to be affected by the project (including baseline).
- Description of the project's likely significant effects;
- Alternatives comprising a description of the reasonable alternatives considered by the applicant, which are relevant to the project and its specific characteristics, and an indication of the main reasons for the option chosen, taking into account the effects of the project on the environment
- Description of mitigation and compensation measures.
- Description of monitoring measures.
- Quality (presentation, non-technical summary and quality of experts).

Based on careful consideration of the above referenced documentation by reference to the EIA Directive EU):

- I agree with and adopt the conclusions reached in the Ramboll Report (at Appendix 1) regarding the adequacy of the information provided by the Applicant and accordingly am satisfied that PSE has provided sufficient information to enable an EIAR Assessment of the proposed Kinsale Decommissioning Project Consent Application 3.
- I further agree with and adopt the Ramboll responses to the submissions received from the notified bodies and the public as, set out in section 2.4.4 of the Ramboll Report.
- The EIAR submitted by PSE (original reports submitted with the application and EIAR Addendum No. 3 dated January 2022) were prepared by Hartley Anderson and Arup. The EIAR assessment carried out by Hartley Anderson and Arup in respect of the activities related to Consent no. 3 (as set out in applicant documentation) reaches an overall conclusion that the activities concerned will not result, either directly or indirectly, in likely significant adverse effects on the environment, alone or cumulatively with other existing or approved projects.
- I agree with and adopt the EIAR Technical Review carried out by Ramboll in respect of the proposed works involved in the PSE application. At Section 4 of the Ramboll Report, Ramboll carry out an assessment of the information provided by PSE in relation to the proposed activities by reference to the EIA Directive and relevant EU and EPA guidance. Section 5 of the Ramboll Report goes on to set out in detail the mitigation and management

commitments made by PSE to avoid or reduce any potential impacts on the environment, along with additional measures required to address issues raised in observations received from notified bodies in response to the application. At Section 6 of the Ramboll Report, Ramboll conclude that they agree with the EIAR carried out by Hartley Anderson and Arup on behalf of PSE and that based on the proposed activities, information presented, and the mitigation and management measures proposed, it is concluded that the works proposed under this application will not result in likely significant adverse effects on the environment either from the KADP alone or in combination with other projects and the proposed mitigation, risk reduction measures and commitments is appropriate. The Environmental Management Commitments and Mitigation Measures presented within the EIAR and EIAR Addenda are considered to be appropriate and adequate for managing the anticipated effects associated with the decommissioning activities; no further measures are recommended.

Accordingly, having adopted the Ramboll Report and the conclusions reached in that Report, I am satisfied and have decided that the application by PSE to carry out the decommissioning of certain facilities in the Kinsale Head and Ballycotton gas fields, located within the Kinsale Head Petroleum Lease area in offshore petroleum licensing Blocks 48/20, 48/25, 49/16 and 49/21 is not likely to have a significant effect on the environment subject to the implementation of the mitigation measures referred to in Section 5 of the Ramboll Report, which I adopt and set out in Table 1 of this Determination (below). This decision is contingent on the inclusion of these mitigation measures in any consent that may be granted in respect of this application.

Further, PSE must seek approval from the Department prior to commencement of the proposed activities for the vessel(s) to be used in the decommissioning activities. Confirmation will be required that the survey equipment and methodology are equivalent to that described in the PSE documentation and that the description of the development used to inform the EIAR is still valid. Accordingly, this decision is further contingent on this requirement also being included as a condition of any consent granted in respect of this application.

The Applicant can be informed of this EIAR Review Determination and the public will also be informed with the Determination being published on the Department's website and notice thereof being published in a national newspaper.

Jean Clarke



Environment Assessment Unit, 25<sup>th</sup> July, 2022  
Department of the Environment, Climate and Communications

### **Judicial Review**

Please note that the validity of this EIAR Assessment may be questioned by Judicial Review under Order 84 of the Rules of the Superior Courts (S.I. No.15 of 1986), as amended. Any application for leave to apply for judicial review must be made promptly and in any event within three months from the date of the Determination. Practical information on judicial review can be obtained from the Citizens Information Board, Ground Floor, Georges Quay House, 43 Townsend Street, Dublin 2 or online ([www.citizensinformation.ie](http://www.citizensinformation.ie)) or from the Courts Website ([www.courts.ie](http://www.courts.ie)).



**Table 1: Mitigation measures required to be specified in any Consent that may be granted to the Applicant**

<b>Discipline</b>	<b>Mitigation Measure Proposed</b>	<b>Industry Standard</b>	<b>Project Specific</b>
<b>Compliance assurance</b>	Ensure management of the applications for and monitoring of compliance with the requirements of project environmental permits and consents	X	
	A detailed Environmental Management Plan (EMP) specific to the requirements of the works the subject of this application will be prepared by the contractors based on the draft EMP, and will be provided to the DECC for approval by the Minister before any works take place (Condition 1).	X	
	As part of the EMP, all sources of natural materials to be used be used in undertaking the KADP (e.g. topsoil subsoil, rock armour/cover) will be sourced from suitably licenced facilities, and evidence of this will be provided to the Minister (Condition 2).		
	The applicant must seek prior Department approval for the vessel(s) to be used prior to commencement of the proposed activities. In this event confirmation will be required that the survey equipment and methodology on the vessel(s) are equivalent to that described in the EIA/AA Screening Reports and that the description of the development used to inform the Environmental Risk Assessment is still valid.	X	
<b>Procurement</b>	Ensure requirement to meet MARPOL standards are included in procurement of vessels and rigs to be used in decommissioning operations.	X	
<b>Contractor Management</b>	All vessels and the rig to be used during decommissioning will be subject to audit.	X	
	Contractor performance will be monitored throughout the decommissioning operations		X
<b>Activity Planning</b>	Wherever possible, seek to minimise vessel days by making using of vessel synergies and careful activity phasing.		X
<b>Physical Presence: Interaction with other users: decommissioning activities /operations</b>	Notices to Mariners (NtM) will be issued to cover all phases of decommissioning work associated with each consent application to communicate the nature and timing of the activities to relevant other users of the sea. Before decommissioning work commences,	X	

	Kinsale Energy will provide a draft Marine Notices to the Minister for Transport Tourism and Sport, highlighting the nature of the work involved and the approximate length of time the works will last (Condition 13, or Condition 11 for Consent Application no. 2).		
	All vessels used in the decommissioning operations will meet applicable national and international standards (e.g. in terms of signals and lighting) and would follow established routes to ports	X	
	Lighting and marking of the jackets if left in “lighthouse mode” for a period will be agreed with the Commissioner for Irish Lights to establish new Aids to Navigation (AtoN) to be installed until their removal.  An up to date Navigational Risk Assessment (NRA) with traffic analysis will be undertaken to inform the Commissioners of Irish Lights to set the AtoN requirements. Lighting and marking will comply with IALA (International Association of Marine aids to Navigation and Lighthouse Authority) Recommendations O-139, on the Marking of Man-Made Offshore Structures (2013), and NtM will communicate the new lighting and marking arrangements.		X
	Consultation will take place with fisheries organisations and relevant marine authorities in accordance with legislation	X	
	Guard vessels or standby vessels will be used during well abandonment to monitor statutory 500m zones and to minimise the potential for interaction between decommissioning vessels and other users.	X	X
<b>Physical Presence: Interaction with other users: legacy materials left <i>in situ</i></b>	Rock cover remediation will be used to reduce the potential snagging risk associated with decommissioning pipelines and umbilicals left <i>in situ</i> , or with any potential protruding jacket leg stumps. The rock will be designed to be overtrawlable.		X
	The following measures will be implemented as part of the rock placement programme: <ul style="list-style-type: none"> <li>• The remediation of all pipeline/umbilical end sections and freespan using overtrawlable rock berms, with the option to rock cover all exposed pipeline sections to further reduce risks to third parties;</li> <li>• Accurate rock-placement will be assured by the use of a Remotely Operated Vehicle (ROV) guided fall pipe system on the rock-placement vessel;</li> </ul>		X

	<ul style="list-style-type: none"> <li>• On-going consultation with fisheries representatives and maritime authorities;</li> <li>• All infrastructure decommissioned <i>in situ</i> will be surveyed post-decommissioning to accurately record their location and status. This information will be included on navigational charts and also passed to representatives of the fishing community; and</li> </ul> <p>Standard overtrawling surveys will also be undertaken where wellheads, spoolpieces etc. are removed to confirm the area is clear of debris and snagging hazards.</p>		
	<p>An additional survey will be carried out after the completion of the abandonment operations to confirm the integrity of the abandoned wells. The survey will be undertaken no earlier than 6 months, and no later than 24 months, after the completion of well abandonment operations, and the results shall be provided to the Minister (Condition 11).</p>		X
<b>Discharges to sea</b>	<p>To minimise potential effects from discharges to sea associated with the decommissioning works, all activities will be undertaken in accordance with regulatory and policy controls, including:</p> <ul style="list-style-type: none"> <li>• Existing operational controls for the management of routine marine discharges from the decommissioning activities (e.g. adherence to MARPOL standards); and</li> <li>• Ensure that a chemical risk assessment is undertaken as part of final well decommissioning chemical selection and apply for relevant chemical permits. Chemicals selected for use and discharge for well abandonment will be subject to a Permit to Use or Discharge Added Chemicals PUDAC).</li> </ul> <p>All potential discharges associated with decommissioning the Kinsale Area facilities (e.g. from pipelines and well abandonment) are considered to be minor. Discharges from well abandonment will be minimal, subject to treatment/filtration, with chemicals being selected on the basis of the lowest hazard quotient for the required technical function.</p>	X	
<b>Waste: Materials Recycling, Reuse and</b>	<p>The decommissioning works shall be undertaken in a manner which maximises the potential for reuse and recycling, including</p>	X	

<p><b>Disposal</b></p>	<p>source segregating waste where appropriate. Management of all waste will be undertaken in accordance with the relevant waste legislation and only permitted and licensed waste facilities will be used.</p> <p>A draft Resource and Waste Management Plan has been developed to establish the minimum standards that the contractor(s) must apply during the decommissioning works and accompanies Consent Application No. 2.</p> <p>A detailed Resource and Waste Plan will be prepared by the contractor(s) based on the draft RWMP, and will be provided to DECC for approval by the Minister prior to commencement of the decommissioning works (Condition 4).</p> <p>The draft Resource and Waste Management Plan indicates that:</p> <ul style="list-style-type: none"> <li>• All relevant obligations governing storage, transfer, treatment and disposal of all wastes arising from the Kinsale Area Decommissioning Project will be complied with and the contractor(s) will implement approved method statements and procedures for transporting and managing waste as part of their detailed Resource and Waste Management Plan;</li> <li>• Resource and waste management objectives to be applied to the Kinsale Area Decommissioning Project to maximise the potential for reuse and recycling are: <ul style="list-style-type: none"> <li>- Target 90% recycling rate by weight;</li> <li>- Minimise disposal of waste to landfill; and</li> <li>- Minimise environmental impacts of waste management.</li> </ul> </li> </ul> <p>A fully detailed description of solid waste generation associated with each of the key elements of the Kinsale Area Decommissioning Project will be provided in the detailed Resource and Waste Management Plan.</p> <p>The contractor(s) will put in place all relevant waste authorisations (detailing the name, address and authorisation details of proposed recovery and disposal facilities which will be used for all wastes generated from the decommissioning project) in advance of the removal of any waste and will maintain a register of resource and waste</p>		
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	management information throughout the Kinsale Area Decommissioning Project		
	On completion of well abandonment and removal of subsea structures, an ROV survey of each relevant location will be undertaken to ensure that no debris remains in place. The results of these surveys shall be submitted to the Minister in the form of Seabed Clearance Certificates, prior to the relevant rig/vessel leaving the location (Condition 12).	X	
<b>Energy Use and Atmospheric emissions</b>	There is limited scope for mitigation measures to reduce the residual effect on atmospheric Greenhouse Gas (GHG) loading, or any local effects on air quality. There is the potential to minimise time in the field and associated vessel days and related emissions by making use of vessel synergies and careful activity phasing which would form part of standard programme management, and there is the potential to make further emissions reductions during contractor selection (e.g. those using modern efficient vessels); however neither of these are considered to significantly alter the predicted effect.	X	
	Emissions from material flows will be minimised by using a waste hierarchy approach consistent with the Waste Framework Directive 2008/98/EC; establishing where there is scope for equipment and material re-use and recycling, with disposal only taking place where no feasible alternative is available.	X	
<b>Accidental events</b>	<p>To minimise potential effects from accidental events associated with the offshore decommissioning works, all activities will be undertaken in accordance with regulatory and policy controls, including:</p> <ul style="list-style-type: none"> <li>• Other users of the Kinsale Area, which include fisheries, shipping and other sea users such as recreational sailing and those involved in maritime activities such as surveys, will be alerted to the survey and decommissioning activities via publication of Notices to Mariners detailing rig and vessel positions, activities and timing and by full navigation lighting on the rig and vessels; and</li> </ul> <p>A standby vessel will minimise the potential for interaction between the rig and other users, and much of the decommissioning activity will be within existing exclusion zones</p>	X	

	thereby further reducing the potential for interaction.		
	Adherence to Kinsale Energy risk management measures and legislative compliance will minimise the risk that an accidental event could occur (noting the already very low frequencies of such incidents relating to oil and gas activities), and therefore minimise the likelihood of any resultant significant effect. This includes measures which will be in place to avoid, as far as possible, spills from bunkering and supply operations, and general rig operations, including processes and procedures (e.g. bunkering procedures with reference to sea-state and daylight hours where practicable; procedure to be agreed with the Department of Transport, Tourism and Sport (DTTAS)), colour coding of hoses, storage of hoses in a safe area away from risk of physical damage, inspection of hose couplings, critical valves to be locked and controlled by permit, and general good housekeeping).		X
	Accidental events/environmental emergencies at the onshore Inch Terminal site requiring intervention may include uncontained spillage, leak or loss of containment incident (contractor inventory only as Inch Terminal will be hydrocarbon free), fire, etc.  A list of site emergency contact numbers and the general emergency response actions will be compiled by the contractor(s) and posted at strategic locations throughout the site, such as the site entrance, safety stop-boards and contractor cabins. The emergency contact number list will be updated by each contractor to include their Safety Representative contact name and telephone number.	X	
<b>Accidental events: dropped objects</b>	All lifting operations will be risk assessed.	X	
	During the removal of topsides, jackets, wellheads, spool pieces and other associated infrastructure, every care will be taken to minimise dropped objects and the generation of debris. Any dropped objects will be recovered during decommissioning operations and an independent seabed debris clearance survey conducted once decommissioning operations have been completed to verify that debris clearance has been completed.		X
<b>Accidental events:</b>	Undertake audit of vessel bunkering	X	

<b>loss of diesel inventories</b>	procedures		
	With regard to oil discharges (e.g. from machinery space drainage), the vessels will operate to MARPOL requirements for a Special Area, requiring oily water separation and monitoring prior to discharge. Discharges must be 15ppm or less, recorded in the Oil Record Book and only be made when underway.	X	
	All vessels and the rig to be used during decommissioning will be subject to audit and expected to adhere to Kinsale Energy Health, Environment and Safety policy. They will have in place the relevant, current Shipboard Oil Pollution Emergency Plans (SOPEP) in accordance with MARPOL and/or an oil spill contingency plan, which would be implemented in the event of an accidental event.	X	
	Bunkering to be conducted in favourable sea states and during daylight hours so far as practicable. Procedure to be agreed with Department of Transport, Tourism and Sport (DTTAS).	X	
<b>Physical disturbance: sensitive seabed features.</b>	The minimisation of rig and vessel movements which require anchoring, and the use of dynamic positioning (DP) on most vessels, where practicable to reduce anchor deployment and for each option / activity involving rock placement, efforts will be made to minimise the volume of rock deployed, subject to achieving the required technical function. (Note that sensitive features (e.g. wrecks, Annex I habitats) have not been recorded in previous surveys within the working area).		X
	Pipeline decommissioning options (rock placement) which minimise physical disturbance will be selected subject to wider environmental, safety, technical and economic considerations. For each option involving rock placement, efforts will be made to minimise the volume of rock deployed.		X
	The services of a suitably qualified and suitably experienced maritime archaeologist shall be engaged to monitor subsea works for identified wreck sites that are less than 300m to proposed decommissioning works. The archaeologist and archaeological monitoring shall be licensed by the Department of Housing, Local Government and Heritage. A detailed method statement containing the monitoring strategy shall accompany the		X

	<p>licence application.</p> <p>Kinsale Energy will provide specifications in advance of the proposed work to allow the archaeologist to determine any mitigation strategies that may need to be put in place to protect identified shipwreck remains. In particular the wrecks, including the UC-42, that are in closest proximity to the decommissioning works (including any impacts from plant and machinery), shall have an adequate exclusion zone imposed to ensure there is no impact on the known location of the wreck and its immediate environs.</p> <p>Kinsale Energy will follow the advice of the archaeologist, including suspension of activities should known or previously unknown underwater cultural heritage be identified or impacted. The Underwater Archaeology Unit shall be contacted immediately in this event. . Provision shall be made to accommodate the monitoring archaeologist on board decommissioning vessels to enable them to successfully carry out their work).</p> <p>Upon completion of the archaeological monitoring, a detailed monitoring report shall be forwarded to the National Monuments Services' Underwater Archaeology Unit.</p>		
<p><b>Under Water noise</b></p>	<p>As no likely significant effect on marine mammals from underwater noise is predicted, it is not proposed to engage a Marine Mammal Observer (MMO) during the works, or that any specific mitigation is required in relation to underwater noise effects.</p> <p>Planned pre-and post- rock placement surveys will not include any seismic sources (e.g. airguns), and the location of the offshore surveys means there is not necessary to adhere to the DAHG Guidance to Manage the Risk to Marine Mammals from Man-made Sound Sources in Irish Water (2014). Within the inshore areas, (e.g. within a bay or within 1,500m of the entrance of an enclosed bay), the measures outlined in DAHG (2014) will be adhered to, including the engagement of a Marine Mammal Observer (MMO).</p> <p>Furthermore, wherever possible, through careful activity phasing, vessel synergies will be sought to minimise vessel days and associated noise emissions which may impact marine mammals and other receptor groups.</p> <p>Any post-decommissioning survey works will</p>		<p>X</p>



	require appropriate consent applications which will detail the proposed survey methods and mitigation measures.		
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