



[REDACTED]
European Commission, Directorate-General for Energy, Offshore Safety, Gas and Oil
Policies
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Brussels, 29th March 2022

Subject: Follow-ups to the meeting of the EU Offshore Authority Group

Dear [REDACTED]

Thank you for inviting us to the meeting of the EU Offshore Authority Group on the 2nd of March 2022. Allow us to elaborate on our comments made during that meeting.

We welcome the study on the 'Decommissioning of offshore oil and gas installations' presented by Trinomics and DNV. The study provides a good basis for further discussion on the potential need and content of future EU decommissioning regulatory guidance. Decommissioning will grow in importance, including as an enabler for the energy transition, (e.g. through the repurposing of oil and gas infrastructure). We stand ready to share fact-based data and science to help formulate safe and effective policy. Please find in the Annex to this letter our initial views about the study. May we suggest that an expert workshop is organized on the conclusions and considerations expressed in the study. Please let us know if we can facilitate and also host the workshop. Such an expert workshop could be followed by another EUOAG meeting where stakeholders present their views about the report.

As also mentioned during the meeting, we would also like to discuss with you new requirements for the offshore oil & gas sector stipulated in the proposed EU Regulation reducing methane emissions in the energy sector, especially with regard to inactive wells.

Furthermore, given the geopolitical developments and the Council's March 11th Versailles declaration calling for the phase out of the dependency on Russian gas, oil and coal as soon as possible, we suggest starting a dialogue with the European Commission about a reinforced and accelerated development of domestic energies including natural gas and oil.

We are looking forward to further dialogue on these important topics and would appreciate a meeting with your team in due course.

With kind regards,

[REDACTED]
François-Regis Motton de Lostailot-Lasalle
Europe Regional Director

Initial views about study on 'Decommissioning of offshore oil and gas installations' by Trinomics and DNV

In IOGP's opinion it is important to preserve the EU Offshore Safety Directive's existing risk-based approach when developing further EU policy measures.

- The scope and the location of infrastructure to be decommissioned is wide and therefore flexibility of approach is needed.
- A 'one-size-fits-all' framework for the monitoring may be challenging, given diverse scope of infrastructure.

New regulatory measures should promote coherence with other European policy development, e.g. EU Methane legislation, OSPAR 98/3 review, Barcelona Convention, EU Biodiversity Strategy, EIA Directive, IED, NSOAF and we question whether there is scope for new EUOAG guidance as an alternative to a Directive?

- Habitat Retention can support EU's ecosystem restoration policy objectives (enabled by Comparative Assessment / Multi Decision Criteria Analysis consider safety, CO2, science, technology and other criteria).
- Consideration should be given to existing best practices across these policy frameworks, including others such as material recycling.
- Policy synergies with other offshore industries such as wind, CCS, H2, subsea electricity grids, should be explored.

Regarding the content of the study, we have the following initial comments to offer:

- We support efforts to provide a clear policy framework to incentivise the re-purposing of infrastructure. There is a clear potential in Europe to leverage existing infrastructure in support of CCS and hydrogen, both for transport and storage.
- Comparative Assessment methodologies should also integrate strengthened environmental systems criteria, e.g. habitat retention to safeguard existing ecosystems, or biodiversity interconnectivity and propagation between offshore structures.
- We support clear and transparent consultation mechanisms in Regional Conventions. Responsibility should remain with the relevant competent authority.
- Long-term monitoring may be more effectively ensured through discussions with competent authorities on a case-by-case basis assessing risk, e.g. as in EIA Directive requirements. Level of risks and monitoring approaches / solutions will be different depending on the infrastructure left in-situ.
- Post-decommissioning long-term liability framework should first understand existing data and actual risk exposures. Low risk of an event should be assessed against potential policy solutions.