



INEOS E&P A/S

Project Title / Facility Name:

Hejre Re-Development Project

Document Title:

Environmental Impact Assessment – Hejre tie-back to South Arne

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1. Non-technical summary

INEOS E&P A/S (hereinafter INEOS) plans to develop the Hejre field in the central part of the Danish North Sea. As part of the authority approval of the development plans an EIA (assessment of impacts on the environment) has been made. The EIA is an environmental assessment that aims to describe the project, its impacts on the surrounding environment and the measures taken to prevent and reduce the impacts. This non-technical summary summarizes the main points of the EIA. The full environmental assessment is documented in the subsequent chapters of this report.

The Hejre field is located in licence 5/98 in the central part of the Danish North Sea, approximately 300 km from the Danish west coast and close to the Norwegian shelf border. See location of Hejre on the map below (Figure 1-1). The oil and gas in the Hejre reservoir lie in a geological layer consisting of sandstone at approx. five kilometres depth. Due to the depth, the field is a so-called HPHT field, a field where oil and gas are high temperature and high pressure. This is different from other Danish oil and gas fields, but HPHT fields are well known in other parts of the North Sea.

Development of the Hejre field started in 2011 with the submission of the original development plan and EIA for drilling of up to 12 wells, and a stand-alone platform with living quarters and processing and export of oil and gas. The platform foundation, the so-called jacket, was installed in 2014 and drilling of five wells took place in the period from 2014 to 2016. Oil was confirmed in three of the wells.

The original project was stopped in 2016 when the then owners of the Hejre field DONG E&P and Bayengas cancelled the contract with the supplier consortium for the platform production module. Since INEOS took ownership of DONG E&P late 2017, various solutions for re-development of the Hejre field have been investigated.

The re-development concept presented in this report, the Hejre tie-back to South Arne, comprises a solution where a new minimum topsides module is added to the existing Hejre jacket and where well fluids are routed via a new pipeline to the South Arne platform for processing and further export. The concept will thus to a large extent build on already existing elements (i.e. the Hejre jacket, the 3 Hejre HPHT wells and the South Arne installations).

The present EIA report assesses the environmental impacts of all elements and activities relating to the re-development project. As the Hejre tie-back to South Arne re-development project extends beyond the activities assessed in the original Hejre EIA from 2011 it is considered a change to a project covered by point 29 a in Annex 1 of Act no. 4 of 03/01/2023 on environmental assessment of plans, programmes and specific projects (EIA):

- 29) Any change or extension of projects listed in this Annex, provided that such change or extension itself meets the threshold values, if any, set out in this Annex.

The report also covers a screening of the project's potential impacts on Natura 2000 sites and on Annex IV species) according to the Offshore Habitat Order (Executive order No. 846 of 26/06/2024) and an assessment of impacts on the environmental targets according to the Marine Strategy Act (Act no. 123 of 01/02/2024).

1.1 The project

The evaluation of the re-development concepts has been based on studies of project economics, technical feasibility as well as working environment, safety and environment, sustainable development and business conditions. The selected Hejre tie-back to South Arne re-development concept comprises of an unmanned topsides at Hejre that will be remotely controlled from South Arne. A new 33 km insulated multiphase pipeline will be installed between Hejre and South Arne, where well fluids from Hejre will be processed.

The Hejre oil will be produced to the South Arne Gravity Based Structure (GBS) storage tank where it will be temporarily stored before being exported by shuttle tanker via the existing South Arne oil offloading system. The gas will be exported through the existing South Arne to Nybro pipeline. To ensure that the export gas from South Arne can comply with the specifications required by the Nybro Gas Facility, the heavy gas components, the so-called Natural Gas Liquids (NGLs), from Hejre will be injected into the South Arne reservoir and will remain there.

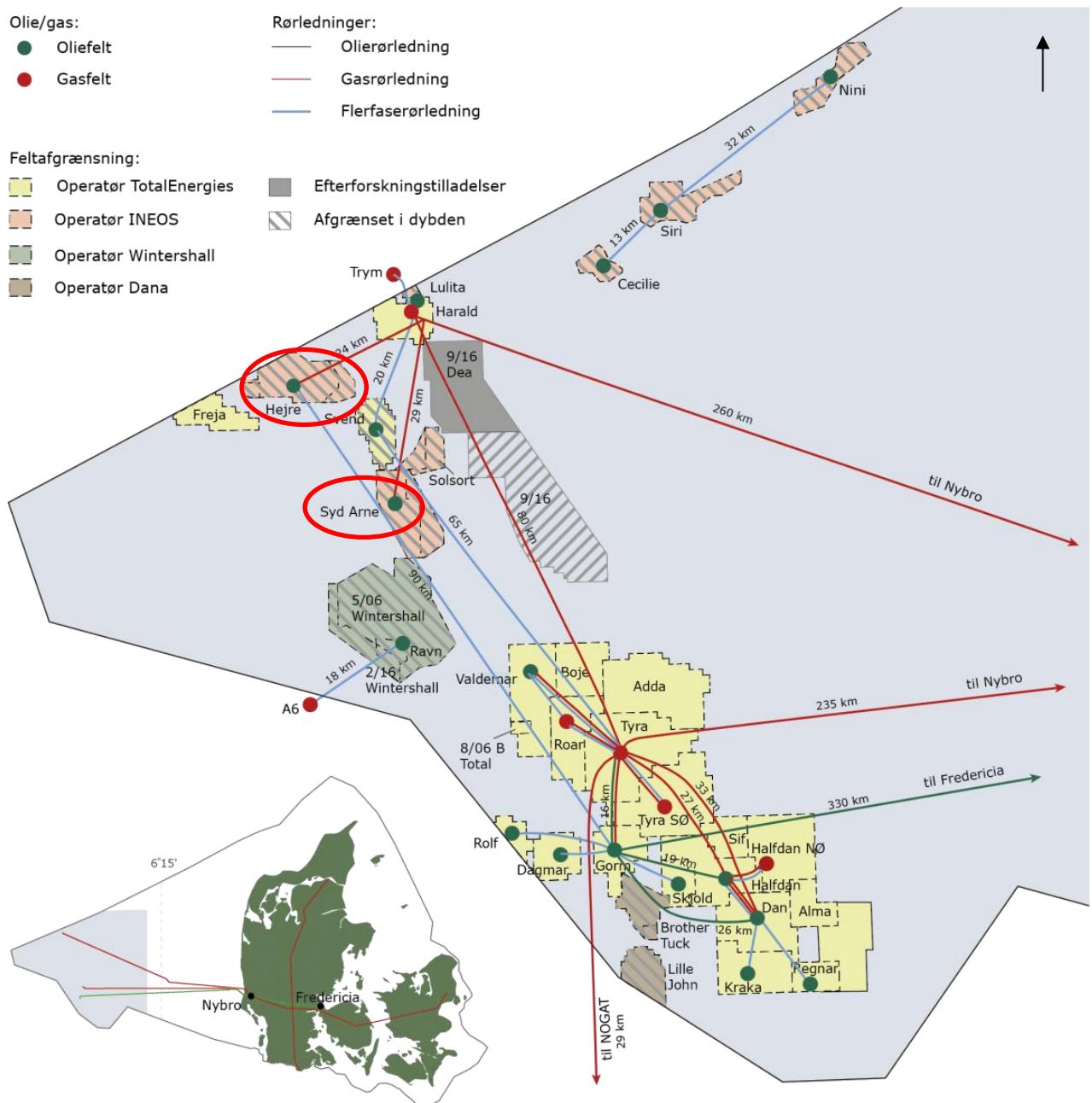


Figure 1-1 Location of the Hejre Field, South Arne and infrastructure in the Danish sector of the North Sea.

The Hejre tie-back to South Arne project includes the following activities required for the re-development, operation and decommissioning of the Hejre field until end-of-life:

- Construction and installation of a new unmanned topsides and a new fortified riser (vertical connection between the multiphase pipeline on the seabed and piping on the platform topsides) at Hejre. This also includes minor modifications to the existing Hejre jacket to

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remove the temporary items left over from the original installation in 2014 and hook-up between the Hejre pre-drilling wellhead module installed in 2014 and the new topside.

- The 3 existing Hejre HPHT wells will be opened to the reservoir and made ready for production (so-called perforation and clean-up). One of the wells that will not be used for production (HA-5) needs remedial cement plug. This part of the work will be carried out by a drilling rig.
- Minor modifications will take place at the South Arne Wellhead Platform East (WHPE) to make the platform ready to receive the well fluids from Hejre. This includes installation of new equipment, such as pumps, and also a new caisson with riser and power cable. A caisson is a large vertical piece of pipe that protects the equipment inside from external impacts.
- Minor modifications will take place at the South Arne Main platform, including removal of obsolete process equipment and installation of new equipment, e.g. pumps.
- Laying and commissioning of a new 33 km 10" or 12" multiphase pipeline and a fibre optics power cable between Hejre and South Arne. Prior to installation a pre-lay ROV survey along the pipeline route will be carried out, and after the installation a post-lay survey will be performed.
- Production of oil and gas from the Hejre wells, processing of the well fluids at South Arne, and operation and maintenance of the multiphase pipeline and power cable, Hejre platform and wells for a maximum of 19 years from 2028-2047.
- Decommissioning, i.e. plugging and abandonment of the Hejre wells, flushing and dismantling the Hejre platform and jacket, emptying the Hejre-South Arne pipeline and preparing for *in situ* disposal below seabed if permitted by the Authorities. If permission is not granted the pipeline and power cable will be removed and disposed of onshore.

Offshore pipeline installation work is expected to start in Q2 2028, and pipeline hook-up, installation of the new Hejre topsides, modifications at South Arne and perforation and clean-up of the Hejre wells is expected to take place in Q2 to Q4 2028. First oil is expected in Q4 2028.

1.2 Alternative Hejre field re-development concepts considered

Since 2016, following early termination of the original Hejre development project, five other main alternatives for the re-development of the Hejre field have been considered but screened out for technical and/or economic reasons.

- Process, Utility and Quarter Topsides. New stand-alone process, utility and living quarter at Hejre for processing of Hejre fluids and using of existing Hejre jacket, pre-drilling unit and export routes. This included the possibility of a co-development of the nearby Solsort discovery.
- Mobile Production Unit. Converted jack-up drilling rig with process module located at the Hejre field for processing of the Hejre fluids using of existing Hejre jacket, pre-drilling unit and export routes.
- Valhall Tie-Back. Tie-back to Valhall (Norway) through a new multiphase pipeline from Hejre to Valhall. New Bridge Linked Platform (BLP) at Valhall for processing of Hejre fluids. Use of existing Hejre jacket and pre-drilling wellhead module.

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- Harald Tie-Back. Tie-back to Harald through a new multiphase pipeline from Hejre to Harald. Umbilical for supply of power, chemicals etc. from Harald to Hejre. New module at Harald for processing of Hejre fluids. Use of existing Hejre jacket and pre-drilling wellhead module.
- Siri Tie-Back. Tie-back to Siri through existing Hejre gas export pipeline to the South Arne Harald WYE at which a new 43 km pipeline would be established to Siri. A new gas export pipeline from Siri to tie in at Tyra East. New manned topside at Hejre with living quarter. Modifications at the Siri platform. Use of existing Hejre jacket and pre-drilling wellhead module.

1.3 Existing environment

1.3.1 Physical and biological environment

This section is a very brief summary of Chapter 6 *Description of the existing environment*. Please refer to this chapter for a more detailed description including references etc.

Environmental setting

The Hejre and South Arne fields are situated in an area with relatively low plankton production. Due to the relatively low biological production, the area is not an important nursery area for fish larvae and juvenile fish (although fish spawning takes place in the area) and the abundance of seabirds is low.

Water quality

The water quality is comparable to other areas in the central North Sea, which are defined as "problem areas" based on a combination of input of contaminants from sources on both land and sea, in addition to input from atmospheric deposition.

Seabed

The seabed sediment around Hejre and South Arne consists of fine sand with a very low content of organic material.

A baseline survey conducted at Hejre field in 2013 prior to drilling, showed that the concentrations of all investigated contaminants (PAH, THC, NPD and heavy metals) were low and generally well below the assessment criteria for sediment contamination provided by OSPAR. There was no difference between the concentrations of contaminants in samples from Hejre and from a reference station located 15 km north of Hejre.

An assessment of contaminants in the sediment around the South Arne platform was conducted in 2021. Concentrations of contaminants (PAHs and heavy metals) were generally low and below the HEL-COM/Danish Targets. In general, there is no correlation between concentrations of contaminants and distance to the Syd Arne platform. The exception is barium for which the average concentration was higher than the potential toxic concentrations (TEL) and concentrations decreased with the distance from the platform. Barium is associated with drilling activities. However, a calculation of the EnS-index (an environmental status index based on descriptors in the Marine Strategy Framework Directive) indicated a "good environmental status".

Benthic infauna

The benthic infauna that lives in and on the surface of the seabed at Hejre and South Arne is generally characterized by bivalves, polychaetes and echinoderms. At South Arne the species diversity seemed to be lower around the platform compared to a reference station, and there seemed to be an increase in species

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biodiversity with increased distance from the platform. This corresponds well with previous findings, that potential impacts on the benthic infauna tends to local.

Fish and fisheries

Herring, sprat and mackerel are the dominating pelagic species at Hejre and South Arne. The dominating demersal species are whiting, haddock, dab, long rough dab, plaice and grey gurnard, however, cod, lemon sole and sand eel are also relatively common.

Most of the commercially exploited North Sea stocks of the typical fish species encountered in the area around Hejre and South Arne are in good condition and are fished at a sustainable level. However, the cod stock in the North Sea is in a poor condition. Spawning stock biomass is below the sustainable level, and the fishing mortality is too high. Cod, plaice, dab, long rough dab, lemon sole, mackerel and whiting spawn in the Hejre and South Arne area.

There is a single fish species that is also added to the list of appendix II and appendix IV species, namely the European sturgeon. This species has been reintroduced to the wild, and may be encountered in the North Sea, but the chances are small.

Seabirds

Due to the relatively low biological production, the waters around Hejre and South Arne are not important for sea birds. During winter some seabirds may be encountered in the area, not because the area is of importance for these species, but because they are distributed over the entire North Sea during winter. The predominant species are fulmar and kittiwake. Additionally, gannet, razorbill and common guillemot occur in low densities. These species are mainly associated with cliffs and offshore islands, and they only occur in the open sea outside the breeding season. They occur in larger densities in other areas of the North Sea with more favourable feeding opportunities than the Central North Sea.

Marine mammals

Grey seals and harbour seals may occasionally be sighted around Hejre and South Arne, although the area is not a core area for these species. Harbour porpoise is the most common cetacean in the North Sea followed by white-beaked dolphin, and minke whale. All cetaceans are listed in Annex IV of the EU-Habitats Directive and is therefore strictly protected. The harbour porpoise is regularly occurring in the waters around Hejre and South Arne.

Protected areas

Hejre and South Arne are situated far from Danish designated Natura 2000 areas. However, ca. 49 km south is a German designated Natura 2000 area: DE 1003-301 Doggerbank. As an extension of this area is the Dutch NL 2008-001 Doggerbank and the UK0030352 Dogger Bank in the UK sector. The basis for the designations of these areas is Harbour porpoise, White beaked dolphin, Minke whale, Grey seal and Harbour seal.

Valuable and vulnerable areas (Særlig Verdifulle Områder (SVO-areas)) is the management framework for marine protected areas in Norway. The closest SVO to Hejre and South Arne is the Sand eel field South. The Sand eel field South is designated as SVO to protect valuable spawning areas for sand eel. The SVO is located ca. 44 km from Hejre. The area is also designated to protect the two seabird species, common guillemot and northern fulmar. Northwest of the Sand eel field South is the Mackerel field SVO, designated as important spawning area for mackerel.

Eight protected areas under the Marine Strategy Framework Directive have been designated in the North Sea. The closest area H is located in the far western part of the Danish EEZ, that is immediately west of

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Hejre and South Arne. The second closest area G is located to the north-east of Hejre and South Arne. None of the project activities are located within the protected areas.

1.3.2 Human environment

Commercial activities in the western part of the Danish sector of the North Sea include:

- Oil and gas extraction
- Shipping
- Fishery and
- Cultural heritage

There are ongoing oil and gas activities in the central North Sea. The closest existing oil and gas facilities in operation to Hejre and South Arne are the Total operated fields Svend and Harald.

Hejre and South Arne are situated outside shipping routes of merchant vessels.

Hejre and South Arne are also situated in an area with low fishery intensity compared to other areas in the North Sea. Although the fishing intensity is relatively low the area is nonetheless of some significance for the Danish fishery for sand eel. The waters around Hejre and South Arne are without significance for the fishery of other countries.

The only cultural heritage that potentially could exist around and between Hejre and South Arne is ship and plane wrecks. The Palace and Culture Agency has not registered wrecks in the project area.

1.4 Assessment of impacts and environmental risks

1.4.1 Impacts that have been assessed

Below is an overview of operations and conditions that potentially may affect organisms and other environmental features that have been assessed in the EIA. The potential impacts are presented for construction (Figure 1-2), operation (Figure 1-3) and decommissioning (Figure 1-4).

Each of the three project phases involve activities with the potential of impacting the environment. These activities are identified in the first row. Each of these specific activities may impact the environment in different ways, which have been identified in the second row. It is these activities that have been assessed in this EIA.

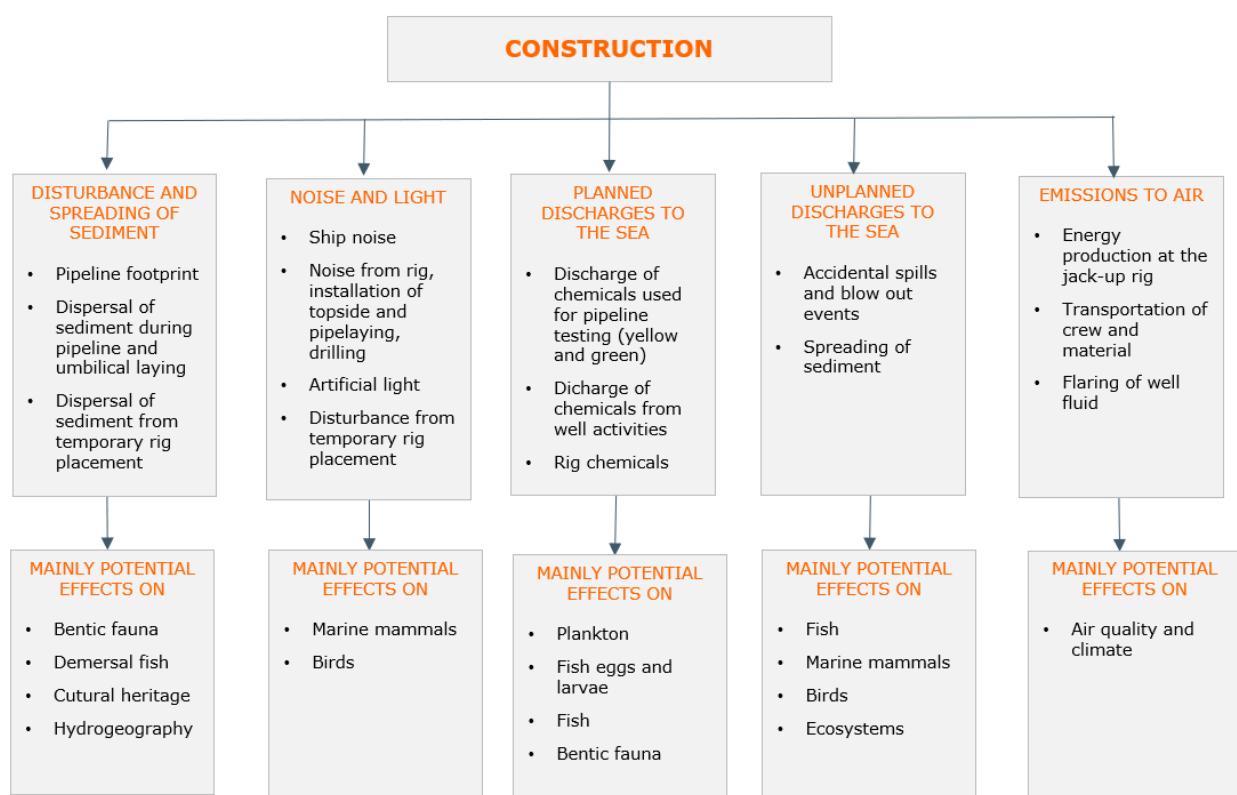


Figure 1-2 Overview of aspects and impacts during the construction phase assessed in the EIA.

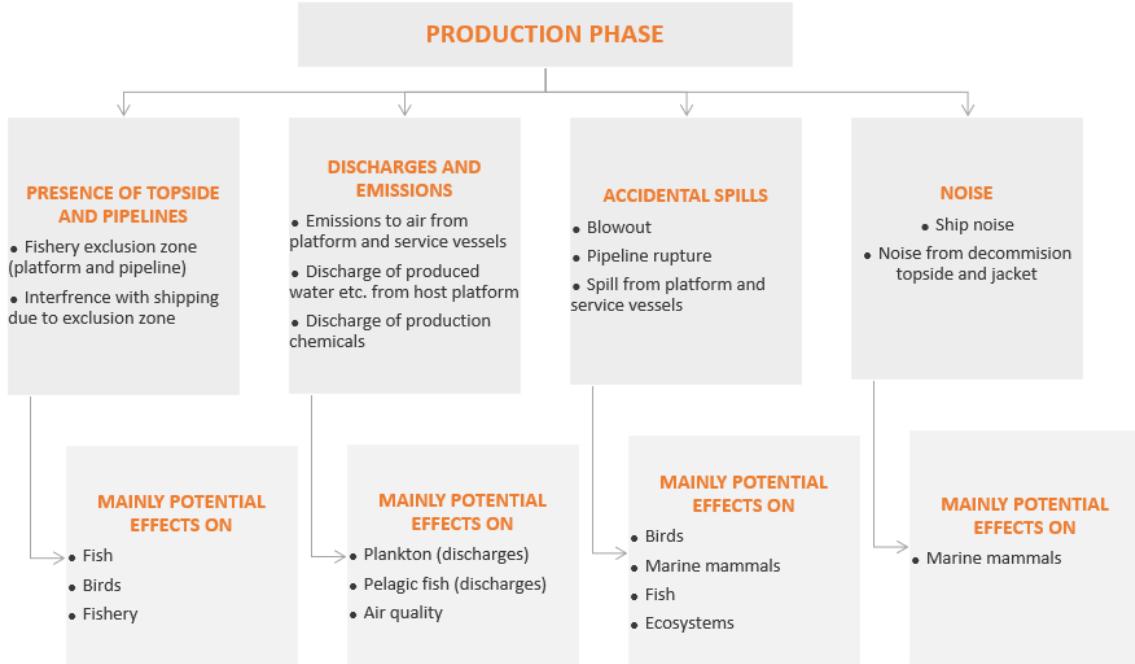


Figure 1-3 Overview of aspects and impacts during the production phase assessed in the EIA.

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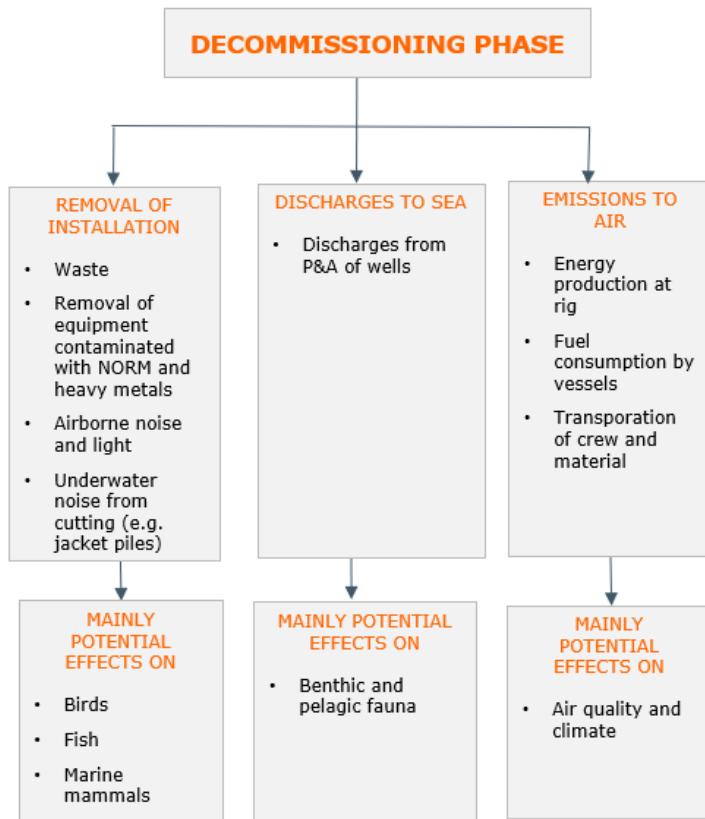


Figure 1-4 Overview of potential impacts during the decommissioning phase assessed in the EIA.

1.4.2 Severity and risk of impacts

Environmental severity and risks of different project activities and incidences have been assessed. Environmental risk is defined as the combination of the severity of and impact of an activity/incidence and the probability that the impact will occur.

The severity of an impact has been defined by combining criteria for:

- The nature of the impact (Positive or negative)
- Extension of the impact (Local, regional, national or international)
- Duration of the impact (Short-term, medium-term or long-term/ reversible vs. irreversible)
- Magnitude of the impact (Small, medium or large).

By combining these criteria in a predefined manner, the following severity categories have been used: Positive impact, no impact, minor impact, moderate impact or major impact.

The probability that an impact will occur has been defined as very low, low, probable, highly probable or definite.

1.4.3 Impacts during construction phase

Drilling, construction and pipelay

Perforation and clean-up of the three existing Hejre wells (HA-1A, HA-2 and HA-4) and remedial cement plug in the HA-5 well will be required. The majority of mud and chemicals used for perforation and clean-up

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will be used in a closed system and skipped and shipped to shore with the exception of utility chemicals. Modelling shows that effects are within a maximum of 1,500 m from the point of discharge. Furthermore, the discharges are short term batch discharges and thus the impact can be expected to be low.

During the construction phase there will be emissions to air in relation to installation activities. Emission related activities primarily include power production on the jack-up rig itself and transportation of crew and material by ship and helicopter. Also, a total of up to 967,000 Sm3 gas and 3,000 Sm3 oil from the three wells will be flared during clean-up. The total emissions from the construction activities include around 32,397 tons CO₂-eq, 383 tons NO_x and 37 tons SO_x. The clean-up flaring comprises approx. 35% of the total CO₂ emissions from the construction activities. The environmental risks related to air emissions is assessed to be negligible as the impact will be minor, it will take place offshore where background levels can be expected to be low, and the activities will occur during a limited period.

During the construction phase machinery, dynamic positioning systems, propellers and thrusters of ships will generate underwater noise. The potential impacts have been investigated in terms of the expected generated underwater noise and sound exposure levels harmful to marine life. The impact of underwater noise producing activities will be temporary and local. Only the use of USBL (Ultra short Baseline) and LBL (Long range Baseline) will exceed the sound exposure levels that are harmful to cetaceans and seals, and their use will therefore be mitigated. Following mitigation, it is assessed that underwater noise will have negligible impacts on marine life such as cetaceans and fish, including the European Sturgeon.

Above-water noise generated during the construction phase has the potential to temporarily disturb seabirds locally. However, as this potential impact is expected for a limited number of birds, it is expected that this will in no way impact seabird population.

The rig and vessels used for perforation of wells and clean up, and the construction will increase the artificial light and noise emissions compared to the production phase. It is expected that these activities will take place 24 hours a day and that the work sites will be illuminated during the dark hours. Artificial light may affect seabirds and migrating land birds both positively and negatively. Light may improve foraging during night for seabirds, but there may also be an increased risk of bird collision, since they may be attracted by the light. The risk of bird collision due to light attraction is considered to be minor and the negative impact on bird population due to light is considered to be negligible.

All waste from Hejre and South Arne will be transported to Esbjerg by vessel. The waste will be sorted and sent to approved waste treatment plants. The environmental risk is assessed to be negligible.

The substructure (legs) of the rig to be used for the well perforation and clean-up activities will be temporary located in the water column. The legs are an open lattice structure and are considered too small to have any impact on the hydrography of the North Sea. In addition to that the rig will only be placed in the location temporarily.

Laying and commissioning of pipeline

The laying of the pipeline and power cable will use USBL an acoustic device to obtain the underwater position of the underwater plough. An LBL system will be used during installation of tie-in spools connecting the pipeline to the platforms in each end. LBL grids will be used for placing the tie-in spools at Hejre and South Arne. The potential impacts have been investigated in terms of the expected generated noise and sound exposure levels harmful to marine life. USBL and LBL are audible to marine mammals, but not to the European Sturgeon, and emits signals at a frequency and source level that may impact hearing negatively in cetaceans. Therefore mitigation will be employed in the form of a slow start to deter marine mammals and reduce the risk of hearing damages. A pre-lay survey and a post-lay survey will be conducted prior to and after installation of the pipeline and power cable. This will have the potential to impact marine life such as fish and cetaceans also due to use of a USBL system, wherefore mitigation will be employed as above to

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reduce risk of hearing impairment in marine mammals. The behavioural reactions cannot be mitigated, and it is expected that USBL/LBL use will deter marine mammals from within up to 5.5 km from the source. The noise generation from USBL and LBL will be around 25 days and is in a local area and fully reversible within hours after the work vessel carrying the USBL system has left the area or the LBL grids have been removed. Based on this, potential impacts are assessed to be negligible.

The laying of the pipeline and power cable will disturb the seabed via the process of trenching or jetting and cause temporary turbidity in the water, possibly affecting the benthic and pelagic organisms. Following trenching down the pipeline, non-trenched parts will be covered with rocks and concrete matrasses, which will also create resuspension of sediment. Such impact will be insignificant and will not affect the spawning stocks or recruitment of species spawning in the area such as cod. Since the area is not a core spawning area for the vulnerable sand eel, the environmental risk of an impact on spawning stock and recruitment of sand eel is assessed to be negligible.

The laying of the pipeline and power cable may potentially bury or damage any ship or plane wrecks along the route. However, the Palace and Culture Agency has no registered findings of wrecks in the vicinity of the project area and the environmental risk is assessed to be negligible.

The trench will naturally backfill within a short period of time. After the backfilling, benthic fauna will recolonize the affected areas through migration or natural recruitment. The impact is therefore considered negligible.

The pipeline will be pressure tested using seawater that has been added a combined cocktail of corrosion inhibitor, biocide and oxygen scavenger, to which a fluorescent tracer chemical will be added. Since the discharges take place over a very short period (24 hours), it is assessed that the toxic effects on any eggs or larvae of fish that may be spawning in the area and other plankton organisms will be local, marginal and without measurable impacts on the stocks.

1.4.4 Impacts during production phase

Hejre will be supplied with power from the host South Arne, and thus no power generation will take place at Hejre. At South Arne the power is generated by two 24 MW gas turbines. Also, no flaring will occur at Hejre and the emissions related to flaring at South Arne are expected to remain at the existing level. No emissions will occur at Hejre, apart from emissions related to transport by ship and helicopter in relation to facility maintenance, and the impact of air emissions from flaring and power production at South Arne (CO₂, NO_x and SO_x) is therefore assessed to be low (CO₂) or negligible (NO_x and SO_x).

All waste from Hejre and South Arne will be transported to Esbjerg by vessel. The waste will be sorted and sent to approved waste treatment plants. In case equipment is contaminated with Naturally Occurring Radioactive Material (NORM), it will be sent onshore for cleaning, and the NORM waste will be stored at an approved site. The environmental risk is assessed to be negligible.

Produced water from the Hejre wells will be processed and discharged at the South Arne platform or re-injected into the South Arne reservoir after treatment with the primary objective of keeping the content of oil in the produced water below the OSPAR requirement of 30 mg/l. The current level of discharges of produced water from South Arne are not expected to change after tie-in of Hejre.

Regular maintenance of the Hejre facility and wells and as well as survey and required maintenance of pipeline will occur over the 19 years lifetime of the facility. Maintenance involves discharge of facility and well service chemicals. The discharge will occur over a period of a few hours per event and with a maximum effect range of 5000 meters. Subsea surveys and maintenance will require use of ROV with USBL, and the effects hereof on marine mammals is assessed as negligible because it is short range, short-term and fully reversible with hours.

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1.4.5 Impacts during decommissioning phase

The expected lifetime of the Hejre installation is a maximum of 19 years from 2028-2047. The decommissioning of the platform, wells and pipelines/cables is related with a number of potential impacts such as emissions to air from rig activities, discharges from plugging and abandonment (P&A) of wells and possible disturbance by light and underwater noise and of the seabed due to removal of structures.

Emissions to air from decommissioning activities are related to fuel consumption by the jack-up rig, special vessels such as heavy lift vessels and transportation of crew and material by helicopter and boats. The emissions from the decommissioning activities of the Hejre tie-back to South Arne are 53,710 tons CO₂, 906 tons NOx and 69 tons SOx. The environmental risk from emissions is assessed to be negligible.

P&A activities of the Hejre wells will result in discharge of mud and chemicals. WBM, cement, slop chemicals, wash train chemicals and rig chemicals will be discharged. OBM will be used, and mud will be shipped to shore. Modelling shows that effects for a limited amounts of chemicals are within a distance 250 m and up to 5000 m from the discharge point for a few of the wash train chemicals. However, the discharges are short term and thus the impact can be expected to be negligible to low.

Decommissioning will require use of ROV with USBL, and the effects hereof on marine mammals is assessed as negligible because it is short range, short-term and fully reversible with hours.

The new multiphase pipeline is expected to be emptied and left *in situ*, subject to approval, or will alternatively be removed. The emptied and cleaned out pipeline and subsea structures will remain buried below seabed level and will slowly degrade, and the impacts from this during the decommissioning phase will be negligible.

1.4.6 Impacts of accidental spills

Blow-out and pipeline rupture are extremely rare events. However, in case of blowout or pipeline rupture the environmental impacts may be severe. Experience from previous blowouts and oil spills at sea have shown that it is mainly birds, marine mammals, fish and coastal ecosystems that may be affected by large oil spills.

The assessment of the environmental impacts of accidental blowout is based on modelling results representing a worst-case scenario in which no mitigating oil spill response measures are taken.

It is assessed that the environmental risks related to accidental spills during construction and operation of Hejre is low to negligible.

The environmental risk of a blowout is generally assessed to be low. This is mainly due to the risk of a blowout being extremely low since double barrier safety systems and mitigative measures are in place on the platform. Drilling activities will be carried out in accordance with best available practice to reduce risk of blowouts. In case of a blowout, the INEOS oil spill contingency plan will be activated, and oil spill combat will be carried out, which will reduce the spreading of oil and mitigate impacts of any spill.

1.4.7 Summary of environmental impacts

The tables below summarise the assessed environmental severities and risks of planned activities during construction phase (Table 1-1), production phase (Table 1-2) and decommissioning (Table 1-3). Table 1-4 shows the severities and risks during accidental spills.

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Table 1-1 Environmental severity and risk of planned activities during the construction phase.

| Impact | Severity of impact | Probability of impact | Environmental Risk |
|---|---------------------------|------------------------------|---------------------------|
| Impacts of discharges to sea | | | |
| Discharge of chemicals from rig activities / drilling | Insignificant impact | Probable | Negligible |
| Discharge of pipeline testing chemicals | Insignificant impact | Probable | Negligible |
| Impacts of air emissions | | | |
| Air emissions (NO _x , SO _x) | Minor impact | Low | Negligible |
| Air emissions (CO ₂ -eq) | Minor impact | Highly probable | Low |
| Impacts of underwater noise | | | |
| Pre- and post-installation survey – underwater noise | Minor impact | Highly probable | Negligible |
| Noise from rig | Insignificant impact | Highly Probable | Negligible |
| Noise from support vessels | Insignificant impact | Highly Probable | Negligible |
| Pipeline and cable laying | Insignificant impact | Highly probable | Negligible |
| Rock and matress placement | Minor impact | Highly probable | Negligible |
| Impacts of artificial light | | | |
| Night foraging opportunities for seabirds | - | Probable | Positive effect |
| Bird collision due to light attraction | Minor impact | Low | Negligible |
| Impacts of waste | | | |
| Generation of waste | Minor impact | Low | Negligible |
| Impacts on seabed | | | |
| Laying of pipelines – dispersion of sediments | Insignificant impact | Highly probable | Negligible |
| Impacts on cultural heritage | | | |
| Damage of wrecks | Minor impact | Very low | Negligible |
| Impact on hydrography | | | |
| Impacts on seabed | Insignificant impact | Low | Negligible |
| Impacts on water column | Insignificant impact | Low | Negligible |
| Impacts on benthic fauna | Insignificant impact | Low | Negligible |

Table 1-2 Environmental severity and risk of planned activities during the production phase.

| Impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------------|------------------------------|---------------------------|
| Impacts of discharges to sea (at South Arne) | | | |
| Impacts of produced water discharges on pelagic organisms | Minor impact | Low | Negligible |
| Impacts of underwater noise | | | |

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| Impact | Severity of impact | Probability of impact | Environmental risk |
|--|----------------------|-----------------------|--------------------|
| Underwater noise from inspections | Minor impact | Probable | Negligible |
| Noise from support vessels | Insignificant impact | Highly Probable | Negligible |
| Impacts of air emissions (at South Arne) | | | |
| Air emissions (NO _x , SO _x) | Minor impact | Low | Negligible |
| Air emissions (CO ₂ -eq) | Minor impact | Highly probable | Low |

Table 1-3 Environmental severity and risk of impacts of planned activities during decommissioning.

| Impact | Severity of impact | Probability of impact | Environmental risk |
|---|----------------------|-----------------------|--------------------|
| Impacts of air emissions | | | |
| Air emissions (NO _x , SO _x) | Minor impact | Low | Negligible |
| Air emissions (CO ₂ -eq) | Minor impact | Low | Negligible |
| Impacts of underwater noise | | | |
| Underwater noise from inspections prior to decommissioning | Minor impact | Probable | Negligible |
| Noise from support vessels | Insignificant impact | Highly Probable | Negligible |
| Taking up pipeline and cable | Minor impact | Highly probable | Negligible |
| Impacts of waste | | | |
| Generation of waste | Minor impact | Low | Negligible |
| Impacts from discharge to sea | | | |
| Discharge of chemicals from rig activities and P&A activities | Insignificant impact | Highly probable | Low |

Table 1-4 Environmental severity and risk of impacts of accidental spills.

| Impact | Severity of impact | Probability of impact | Environmental Risk |
|--------------------------------------|--------------------|-----------------------|--------------------|
| Impacts of accidental spills* | | | |
| Oil release during blow-out | Major impact | Very low | Low |
| Gas release during blow-out | Moderate impact | Very low | Negligible |
| Rupture of pipeline | Minor impact | Low | Negligible |

1.5 Socio-economic impacts

The following socio-economic issues have been assessed:

- Changes in fish catches and tourism due to prohibited zones
- Changes in fishing industry and tourism due to accidental oil spill and gas escape

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- Changes in employment and tax revenue.

The impact from the project is considered to be negligible or positive. Compared to the total fish catches in the Nord Sea the decline in fish catches due to the Hejre tie-back to South Arne development project is relatively small.

It is unlikely that a potential oil spill or gas escape will affect the commercial fishery or the tourism sector due to the low probability of the accident to occur.

The overall impact on employment from activities at the Hejre tie-back to South Arne re-development is assessed to be positive.

The overall impact on tax revenue from the Hejre tie-back to South Arne re-development is assessed to be positive.

1.6 Cumulative effects

Potential cumulative effects from the re-development of Hejre fall in two categories. Impacts from construction and operation of the tie-back project may interact with:

- Impacts from other oil and gas activities
- Impacts from other activities such as wind farms, cable and pipeline installation and fishery and shipping in the region.

Potential cumulative effects from Hejre have a low likelihood to occur during the production phase, with emission to air and as closest platform is around 25 km from Hejre.

At the South Arne area, discharges of produced water are not likely to have potential cumulative effects as the distance to other platforms with similar discharges are too far to influence each other.

There is no knowledge of any planned simultaneous activities by INEOS or operators nearby. Cumulative impacts from other activities are not expected.

1.7 Cross border impacts

Mainly local effects from the project are expected during normal operation but in relation to accidental situations as blow outs and spills transboundary effects can occur.

Cross border impacts have furthermore been described in detail in a specific ESPOO document.

1.8 Natura 2000 areas

The EU Habitats Directive (Council Directive 92/43/EEC of 21 May 1992) specifies natural habitats and wild fauna and flora for which the member states must ensure protection. The species and nature habitats to be protected are specified in the Annexes of the directive.

Hejre and South Arne are situated far from Danish designated Natura 2000 areas. However, around 49 km south of the field is a German designated Natura 2000 area: DE 1003-301 Doggerbank. Part of the basis for the designation of this area are the harbour porpoise, White beaked dolphin, minke whale, harbour seal and grey seal, along with habitat type Sandbank and *Species-rich gravel, coarse sand and shell layers*.

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Since the nearest Natura 2000 area is 49 km away and given that the negative impacts this project may have on the marine environment will not propagate nearly this far (estimated 1,5 km for sediment resuspension and 5,5 km for underwater noise), impacts will not hinder the conservation objectives of any Natura 2000 sites.

1.9 Appendix IV species

Annex IV lists species of animal and plants in need of particularly strict protection. Of the marine mammals encountered in the North Sea, all species of cetaceans are listed in Annex IV. However, only harbour porpoise, white-beaked dolphin and minke whale are encountered regularly in the Danish part of the North Sea. The European sturgeon is also an appendix IV species, however based on the very small numbers of released and extent individuals of sturgeon, it is assessed that there is negligible risk that it will be encountered and impacted by the described activities. The project will not negatively affect the ecological functionality of the area as a migration, breeding or resting site for harbour porpoises, white beaked dolphins, minke whales or sturgeon, nor deliberately disturb harbour porpoises, white beaked dolphins, minke whales or sturgeon during breeding, rearing of young or migration, or in general as the disturbance is short-term and fully reversible with the stated mitigation for underwater noise, as well as it is short-term and fully reversible for suspended sedimentation.

1.10 Marine Strategy Framework Directive

Good Environmental Status in the marine environment is described by 11 descriptors defined in the Marine Strategy Framework Directive (MSFD). MSFD is implemented in Danish marine strategy act, which is setting the framework for the management of the marine areas in Denmark.

A summary of the potential impacts on the 11 descriptors is provided in the table below (Table 1-5).

Eight areas in the North Sea have been designated as marine protected areas according to the Marine Strategy Framework Directive. The closest is area G to the west of the project area, and the second closest is area H east of the project area. This project has no activities within these protected areas.

Table 1-5 Potential impacts on the 11 descriptors given by the Marine Strategy Framework Directive is summarised below. The environmental risk of preventing or delaying good environmental status is assessed.

| Descriptor | Assessment of potential impact |
|--|--|
| D1 Biodiversity | Potential impact on species and habitats includes impacts from airborne and underwater noise, light, spreading of sediment, physical disturbance of seabed, planned discharge, accidental spill of oil and chemical and risk of blowout. The potential impacts are assessed either to be negligible or no impact The impact on the environmental targets for descriptor 1, <i>biodiversity</i> , will not prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |
| D2 Non-indigenous species | International vessels can introduce non-indigenous species through marine fouling and discharge of ballast water. The risk of introduction of new non-indigenous species is considered low. Due to the low risk of a major impact on the environmental targets for descriptor 2, <i>non-indigenous species</i> , it is assessed that the project will not prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |
| D3 Commercially exploited fish stocks | Commercially exploited fish stock can potentially be affected by physical disturbance, spreading of sediment, underwater noise, planned discharge of chemicals and unplanned oil spill (blowout). It is assessed that the potential risk of affecting fish stocks is negligible. The potential impacts on the environmental targets for descriptor 3, <i>commercially exploited fish stocks</i> , are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |

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| Descriptor | Assessment of potential impact |
|---|--|
| D4 Marine food webs | <p>Marine food webs can potentially be affected by physical disturbance of the seabed, spreading of sediment, underwater noise, artificial light, planned discharge of chemicals and unplanned oil spill (blowout).</p> <p>The potential impacts on the environmental targets for descriptor 4, <i>marine food web</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D5 Eutrophication | <p>There will be no impact on descriptor 5, <i>eutrophication</i> and it is assessed that the project will not prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D6 Sea floor integrity | <p>The seafloor integrity will be temporarily affected during pipelay due to physical disturbance of the seabed and by the rig activities for well drilling, perforation and clean-up activities. The pipelines will be buried >1 m below the seabed and the integrity of the seabed is expected to recover few years after pipelay.</p> <p>It is assessed that the potential risk of affecting the sea floor integrity is negligible.</p> <p>The potential impacts on the environmental targets for descriptor 6, <i>sea floor integrity</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D7 Alteration of hydrographical conditions | <p>The hydrography may be impacted by the presence of the rig for well perforation and clean-up activities.</p> <p>The project will not alter hydrographical conditions.</p> <p>The potential impacts on the environmental targets for descriptor 7, <i>alteration of hydrographical conditions</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D8 Contaminants (concentrations and species health) | <p>Discharge of produced water in addition to drilling and production chemicals will not exceed threshold values set in the Marine Strategy II.</p> <p>The potential impacts are assessed to be negligible.</p> <p>Acute pollution events include accidental spill and blow-out. These are extremely rare events. The risk of accidental spill and blow-out is furthermore prevented through a number of mitigating measures.</p> <p>The potential impacts on the environmental targets for descriptor 8, <i>contaminants</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D9 Contaminants in fish and other seafood for human consumption. | <p>Measurable contaminants in fish and other seafood will only occur as a result of major oil spill.</p> <p>It is assessed that the potential risk of affecting the contaminants in fish and other seafood for human consumption is negligible.</p> <p>The potential impacts on the environmental targets for descriptor 9, <i>contaminants in fish and other seafood for human consumption</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D10 Marine litter | <p>Littering will be prohibited on the platform, and all waste are collected, sorted and send to shore.</p> <p>The potential impacts are assessed to be negligible.</p> <p>The potential impacts on the environmental targets for descriptor 10, <i>marine litter</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D11 Underwater noise | <p>During construction, production and decommissioning it is expected that the majority of noise generated will be vessel noise (low frequency) and noise from the use of USBL and LBL (high frequency). The use of USBL and LBL will be mitigated and noise levels will therefore not exceed the thresholds for PTS set in the Marine Strategy II.</p> <p>The potential impact from noise is assessed to be negligible to minor</p> <p>The potential impacts on the environmental targets for descriptor 11, <i>underwater noise</i>, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |

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1.11 Monitoring programme

A monitoring programme in line with regulatory requirements is already in place for the South Arne including continuous monitoring in relation to discharges to sea and emissions to air. A similar monitoring programme for Hejre will be set up and agreed with relevant authorities based on requirements in legislation and permits.

For South Arne a risk-based approach for produced water management in alignment with OSPAR and Danish authority guidelines is already in place. The modelling of the environmental risk of discharges will be updated to include the Hejre tie-in latest 6 months after the discharge of produced water begins. The modelling of environmental risk will be updated at least every 5 years according to the guidelines.

A seabed monitoring programme covering the Danish part of the North Sea takes place every three years. This has traditionally included seabed sampling for monitoring the environmental status of the seabed around the oil and gas installations.

1.12 Project design and impact mitigation

1.12.1 Environmental management

In general, a range of parameters are applied through INEOS's environmental management system including proper working procedures to minimize the environmental impact from operation, using BAT and BEP (best available technology and best environmental practice) in the process of selecting the technical solutions. It is considered a general INEOS practice to have proper contingency plans in place with established working procedures to minimize the effects of incidents or to effectively collect spills, should an incident happen. INEOS also systematically register and analyse incidents and near-miss events to prevent unintended environmental impacts in the future.

1.12.2 Project adaptations

Other, more specific measures will be considered for the individual installations as summarised below:

- Operational excellence: Minimizing the environmental impact by focusing on stable production, reduction of slugging and limiting the number of unplanned shutdowns.
- Evaluation and implementation of initiatives at Hejre to reduce emissions to air and thereby the climate impact as much as possible:
 - Installation of electrical driven crane instead of diesel driven crane if feasible.
 - Reducing emissions to air as part of the energy efficiency management system. Potential savings in energy consumption and emissions to air evaluated on a yearly basis.
- Limiting the impact on marine mammals in relation to underwater noise from pipelay, surveys, sub-sea maintenance and decommissioning activities by evaluating noise impact from equipment to be used and employment of mitigation in the shape of respectively a 22 and 30 minute period where USBL and LBL signals are played out at lowest possible level every 30 seconds before normal operation, reduces the risk of PTS and TTS to 0 meters.
- Limiting the risk of introducing non-indigenous species from vessels by exchange of ballast water in open waters, by implementing a ballast water treatment system or by regular removal of marine fouling from the vessels sides prior to departure. See section 19.7 for further information.

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1.12.3 Mitigation measures

Underwater noise from the use of USBL and LBL systems can cause permanent or temporary hearing impairment in harbour porpoises and likely other marine mammals. Therefore, mitigation will be employed in terms of a defined slow start alike 22 minutes for USBL and 30 minutes for LBL to deter marine mammals from the zone of auditory impairment to fully reduce this risk, depending on the exact equipment. All other potential impacts are assessed to be either 'insignificant' or 'low, and no possibilities for effectively reducing the impacts further have been identified.

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2. Introduction

INEOS is investigating the possibility to re-develop and subsequently operate the Hejre field in the Danish sector of the North Sea. The Hejre field was previously operated by DONG E&P A/S. The intended re-development entails a development solution with a Hejre tie-back to South Arne using the existing Hejre facilities.

The partners in the Hejre licence (5/98) are:

- INEOS (operator) 60 %
- INEOS E&P (Norge) Petroleum DK AS 25 %
- INEOS E&P (Petroleum Denmark) ApS 15 %

INEOS had commissioned COWI in 2023 to carry out an environmental impact assessment (EIA) for the re-development, operation and decommissioning of the Hejre field (INEOS, 2023). The report is updated in 2026 by INEOS with support from NIRAS and Xodus. The report documents the EIA process, findings and conclusions. The EIA has been carried out in compliance with the Danish EIA regulation (Consolidation Act No. 4 of 03/01/2023).

The report also covers a screening of the project's potential impacts on Natura 2000 sites and on Annex IV species) according to the Offshore Habitat Order (Order No. 846 of 26/06/2024) and an assessment of impacts on the environmental targets according to the Marine Strategy Act (Act no. 123 of 01/02/2024).

The original Hejre concept ('Hejre Legacy') was approved by the Danish Energy Agency (DEA) after the completion of an EIA process (DONG E&P A/S 2011). The platform steel jacket and pre-drilling wellhead deck was installed in 2014. The topside fabrication contract was however terminated in 2016 due to technical difficulties and significant delays. Drilling continued as per original scope and was completed in 2016. A total of 5 HPHT wells were drilled of which 3 are suitable for being part of the Hejre field re-development. The 3 wells are ready for production after production liner perforation and well clean-up.

As the Hejre field re-development via tie-back to South Arne extends outside the previously approved project scope, an updated EIA report was required according to Act No. 4 of 03/01/2023 on environmental assessment of plans, programs and specific projects (EIA). The re-development project is covered by Annex 1, point 29) *Any change or extension of projects listed in this Annex, provided that such change or extension itself meets the threshold values, if any, set out in this Annex.*

The present EIA report thus assesses the environmental impacts of all elements and activities relating to the full re-development project as of 2025. As the re-development project to a large extent will build on already existing elements (e.g. the Hejre jacket, the 3 Hejre HPHT wells and the South Arne installations) these will be described briefly where relevant to ensure general understanding of the concept and its potential environmental impacts.

2.1 The Hejre field

The Hejre field is located within licences 5/98 and 1/06 in the Danish sector of the North Sea, approximately 300 km offshore from the Danish west coast, ref. Figure 2-1. The licenses cover an area of approximately 114 km² in total.

The field is a High-Pressure High-Temperature (HPHT) oil field with associated gas and comprises of several large segments bounded by faults. Within the main Hejre field, three of the main segments have been penetrated by exploration/appraisal and development wells, and the resources are considered proven. To

date, 7 wells (including discovery well, Hejre-1 and appraisal well, Hejre-2) and 2 side-tracks (HA-1A and HA-3A) have been drilled.

The Hejre jacket is located at the position 6.234.174,9 mN, 559.510,8 mE (reference UTM zone 31 on ED50 Datum) at approximately 68 m water depth.

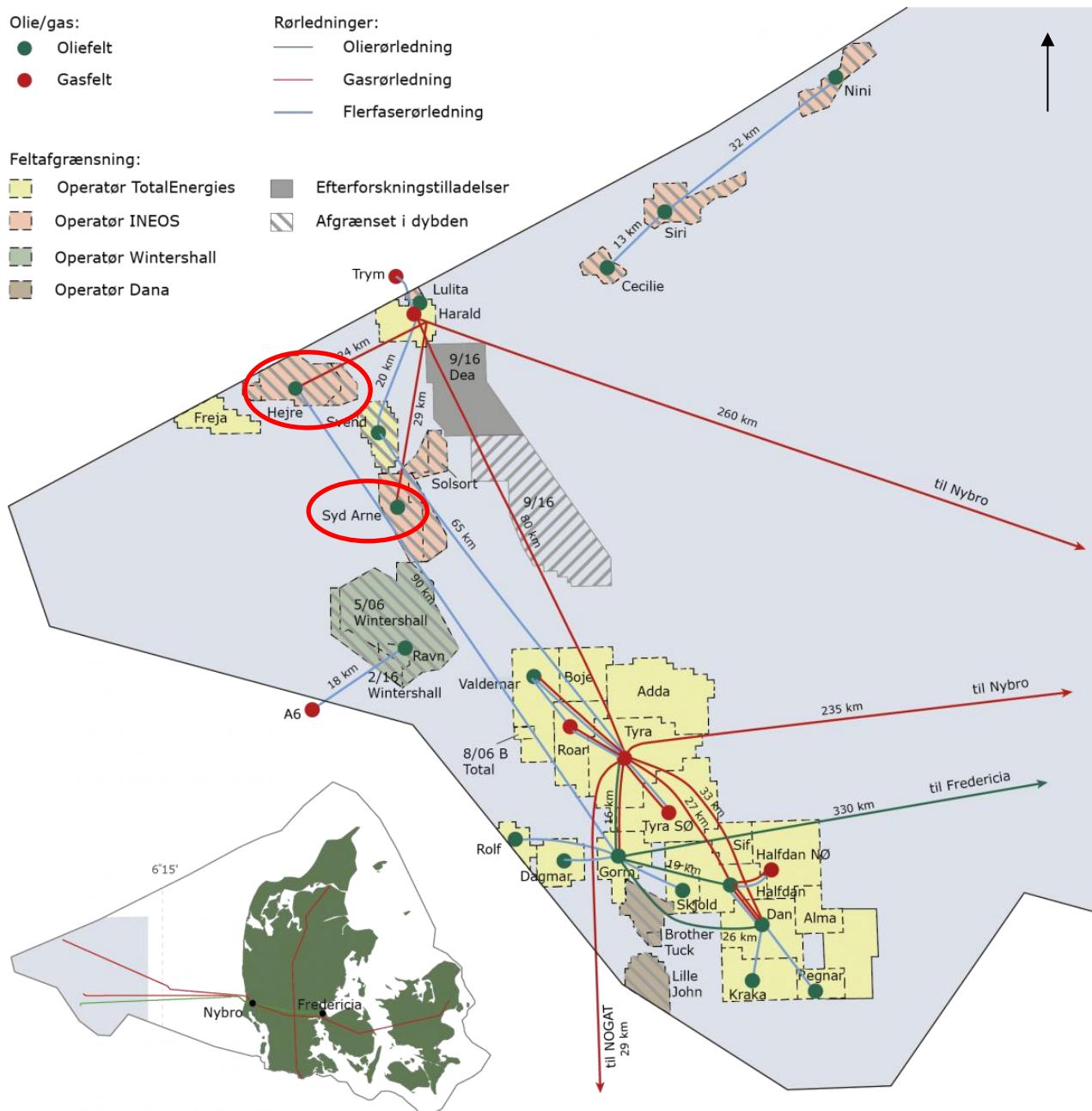


Figure 2-1 Location of the Hejre field, South Arne and surrounding infrastructure in the Danish sector of the North Sea.

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2.2 Original Hejre development concept

The Hejre Legacy development concept was based upon a stand-alone, integrated, live oil production platform with 5 HPHT production wells drilled consecutively with the possibility of drilling up to 12 wells in total.

Hejre Legacy also included two new pipelines: a 90 km oil export pipeline from Hejre to Gorm E and a 24 km gas export pipeline from Hejre to the South Arne Harald WYE connection on the South Arne to Nybro pipeline. From Gorm E the oil would be exported through existing infrastructure to the oil terminal in Fredericia. The original project is shown in Figure 2-2 below:

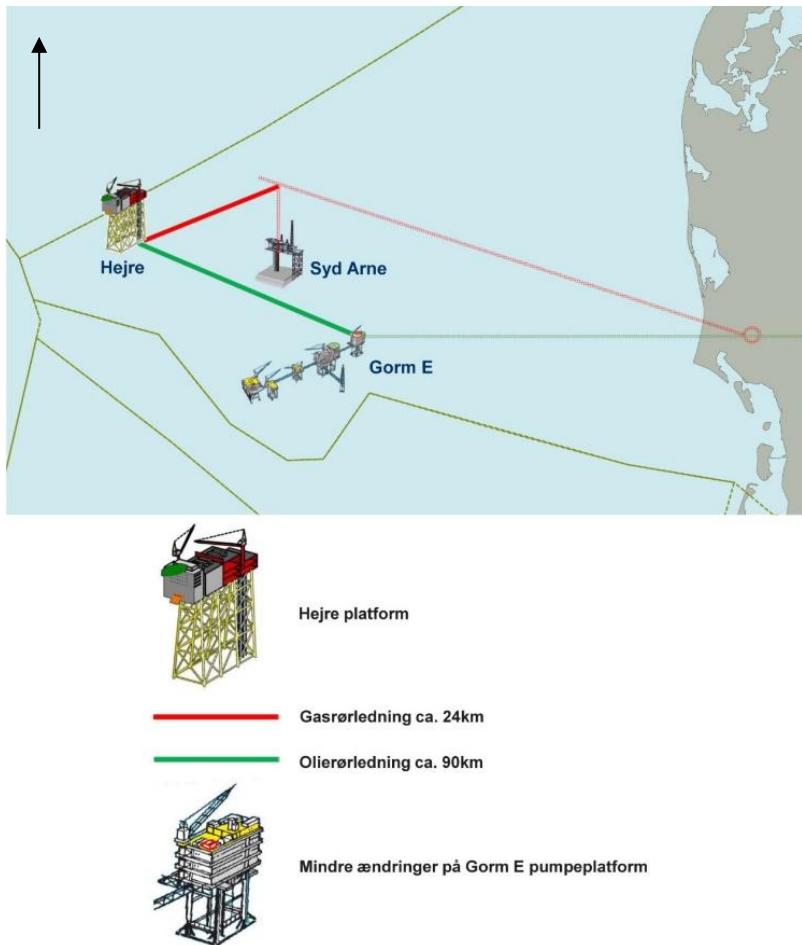


Figure 2-2 Overview of the original Hejre concept presented in the Hejre EIA, DONG E&P A/S 2011. Not to scale.

The platform steel jacket and the pre-drilling wellhead deck (PDWD) was installed in 2014. Drilling was completed in 2016 and at present 3 HPHT wells are ready for production, following perforation and clean-up.

The in-place weight of the Hejre jacket after installation was 8,114 tons and for the PDWD the gross in-place weight was 809 tons. In addition, 16 piles were installed, 4 at each corner leg, to secure the jacket to the seabed. The 16 piles had a total weight of 3,265 tons

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2.2.1 Project phases

2.2.1.1 Jacket and PDWD EPC Phase. February 2012 to June 2014

On 27 February 2012 Technip France signed the EPC contract to Engineer, Procure and Construct (EPC) the Hejre Platform. Jacket and PDWD Fabrication denoted as first steel cut started 03 April 2013 and finished 17 May 2014 where DONG Energy took delivery of the jacket and PDWD. The jacket and PDWD has been constructed by Heerema Fabrication Group (HFG) in Vlissingen yard in Holland.

The jacket and PDWD was installed by Heerema Marine Contractors (HMC) in May/June 2014.

Key dates are summarized in Table 2-1 below.

Table 2-1 Jacket Fabrication, Transportation and Installation Dates

| Step | Start Date | End Date | By |
|-----------------------------|------------|------------|------------------------------|
| Fabrication | 03/04/2013 | 17/05/2014 | By HFG in Vlissingen Yard |
| Load-Out | 21/04/2014 | 22/04/2014 | By Mammoet on skid ways |
| Transportation | 20/05/2014 | 22/05/2014 | By HMC on H-627 launch barge |
| Launch | 23/05/2014 | 23/05/2014 | By HMC on H-627 launch barge |
| Upending and Set-Down | 24/05/2014 | 24/05/2014 | By HMC with Hermod SSCV |
| Pile installation | 24/05/2014 | 02/06/2014 | By HMC with Hermod SSCV |
| Pre drilling deck installed | 02/06/2014 | 04/06/2014 | By HMC with Hermod SSCV |

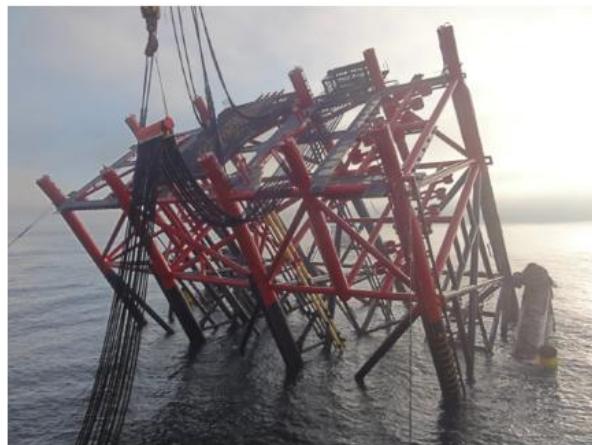


Figure 2-3 Jacket upending and set down

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After Jacket upending and set down, the piles were installed by driving the piles (Figure 2-4) into the ground using a hammer (Figure 2-4). The pile driving was commenced at low energy to for any marine mammals to move away from the noise source.



Figure 2-4 Pile (left) and hammer for pile driving (right)

2.2.1.2 Hejre well drilling phase. June 2014 to September 2016

Drilling of wells by Mærsk Resolve commenced immediately after jacket installation and took place until September 2016 where 5 wells (HA1 to HA5) had been completed.



Figure 2-5 Hejre field well drilling by Mærsk Resolve, summer 2015.

Within this period the Mærsk Resolve drilling rig supplied the necessary power, data communication, life-saving equipment, accommodation etc. for drilling and the necessary manning.

2.2.2 Impact from existing Hejre installations

As there has not been any production from the Hejre field, not has any installation, construction, modification or drilling activities taken place since completion of the drilling in 2016, there are no emissions, waste generation or discharges related to the Hejre field as is today.

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Only remaining impact from the installation of the Hejre jacket is the physical footprint of the Hejre jacket on the seabed (roughly 40x60 meters), but there are no current disturbance of the seabed taking place.

2.3 Hejre tie-back to South Arne concept

The Hejre tie-back to South Arne development concept comprises a new Hejre topsides capable of sending multiphase flow to the existing South Arne Main platform (host), where processing of the multiphase will take place. The structure and the layout of the new Hejre topsides are designed to fit the existing jacket structure and pre-drilling module.

The concept is based on using existing infrastructure and to use available capacity at South Arne. The production from Hejre will be exported to South Arne using a new 33 km multiphase pipeline from Hejre tie-back to South Arne.

After processing at South Arne, the oil and gas will be exported using the existing infrastructure on the South Arne platform. The stable oil will be temporarily stored in the platform's Gravity Based Structure (GBS) from where it will be offloaded by shuttle oil tankers and transported to shore. The gas will be exported through the existing export pipeline from South Arne to Nybro.

Figure 2-6 below shows an overview of the concept.

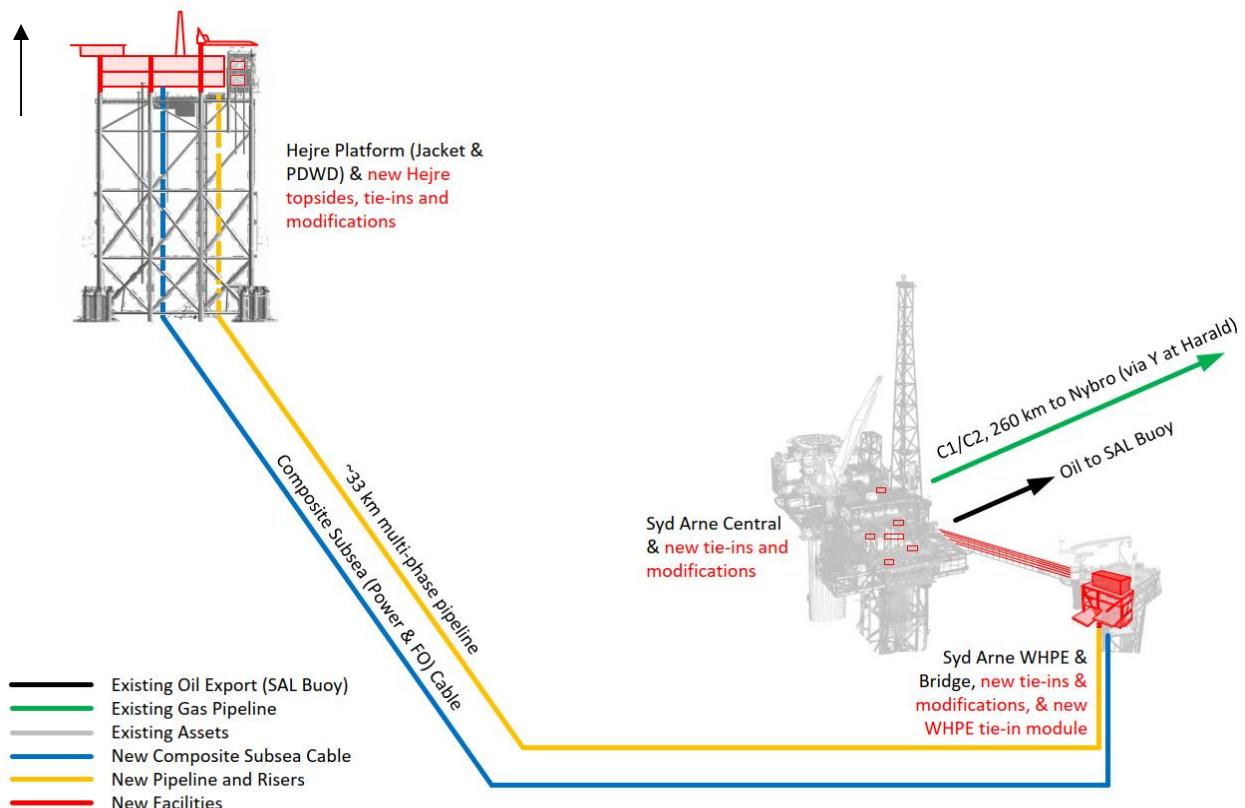


Figure 2-6 Overview of the concept for the Hejre tie-back to South Arne development project.

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2.4 Scope of EIA

This EIA provides a technical description of the project, a presentation of the environmental impacts from the construction, production and decommissioning phases, planned environmental monitoring and if relevant mitigating measures.

This EIA includes an environmental impact assessment of the re-development of the Hejre field including an assessment of the necessary modifications at South Arne, processing and export of oil and gas from South Arne, as well as the decommissioning of the Hejre field.

In short, the EIA covers the following processes:

- Construction, operation, maintenance and decommissioning of a Hejre remotely controlled unmanned topside incl. riser.
- Installation, operation, maintenance and decommissioning of interfield multiphase pipeline and power cable with fibre optic from Hejre to the South Arne.
- Perforation and clean-up of 3 production wells at the Hejre field. Remedial cement plug in HA-5.
- Modifications of the South Arne Well Head Platform East (SA WHPE) including new tie-in module with a sludge catcher, multiphase pig receiver and new riser.
- Tie-in scope at the South Arne main platform including new NGL injection booster pumps.
- Decommissioning

All potential impacts resulting from the tie-back activities are assessed in regard to the criteria's given in Chapter 7. Impacts from activities or components of the Hejre Legacy project that are not part of the Hejre tie-back to South Arne project are not relevant to this EIA and are not described further.

To ease the understanding of the changes between the new tie-back concept described in the present Hejre EIA compared to the stand-alone concept described in the Hejre Legacy EIA from 2011, an overview has been prepared in Table 2-2.

Table 2-2 An overview of the Hejre Legacy concept compared with the new Hejre tie-back to South Arne concept.

| Hejre Legacy Concept | Hejre tie-back to South Arne Concept |
|--|---|
| Drilling of 5 production wells including completion. Production test included. The possibility to drill up to 12 wells included. | Perforation and clean-up of 3 wells. Remedial cement plug in HA-5 |
| Installation of jacket. | No installation of jacket. Jacket already installed as part of Hejre Legacy. Modification of the jacket to remove the temporary items left over from the original installation in 2014. |
| Installation of topside including: Living quarter for max POB of 70 Well head area Process area (see details below) Helideck Flare Two cranes – diesel driven Emergency fire water system Expected weight 15.000 ton | Installation of topside including: Unmanned remotely controlled New riser Helideck Shelter One crane – electrically driven Emergency fire water system Expected weight 3.200 ton |

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| | |
|--|---|
| Pipelines: New oil export pipeline from Hejre to Gorm E New gas export pipeline from Hejre tie-back to South Arne Harald WYE on the South Arne to Nybro gas pipeline | Pipelines: New 33 km multiphase pipeline from Hejre tie-back to South Arne Use of existing gas pipeline from South Arne to Nybro. Power cable from South Arne to Hejre |
| Modifications at Gorm E: New riser Recycling cooler Pig receiver Fiscal metering Modifications to existing piping and manifold | Modifications at South Arne: New tie-in module at the South Arne WHPE including slug catcher, multiphase pig receiver and new riser. NGL injection and booster pumps at South Arne main platform. |
| Average manning expected: POB 29 | Average manning expected: Unmanned. At South Arne crew transportation in relation to maintenance expected as a part of normal operations. |
| Daily production: Oil: 35.000 BOPD Sales gas: 76 MMscfd Produced water max: 10.000 BPD | Daily production (uncapped by host capacity): Oil: Maximum 35.000 BOPD Sales gas: 57 MMscfd Produced water max: 2.000 BPD |
| Processing at Hejre: Processing of oil, gas and water Cleaning and discharge of produced water. Utilizing possibility to export produced water to shore. Power production: 3 dual fuel turbines with output of 5.5 MW each (only two operating at same time) Pressure relief by flare system | No processing at Hejre |
| Maintenance of 5 wells | Maintenance of 3 wells |
| Decommissioning | Decommissioning |

2.5 Time schedule

The proposed time schedule for the Hejre field re-development EXECUTE (Construction) is illustrated below in Figure 2-7. The subsequent Operations phase (a maximum of 19 years from 2028-2047) and the future Decommissioning phases are not shown in the schedule.

Detailed engineering and procurement for the two new topsides module will commence in Q2 2026 followed by onshore construction. Offshore modification at Syd Arne is expected to commence in Q2 2026.

Offshore pipeline installation work is expected to start in Q2 2028, and pipeline hook-up, installation of the new Hejre topsides, modifications at South Arne and perforation and clean-up of the Hejre wells is expected to take place in Q2 to Q4 2028. First oil is expected in Q4 2028.

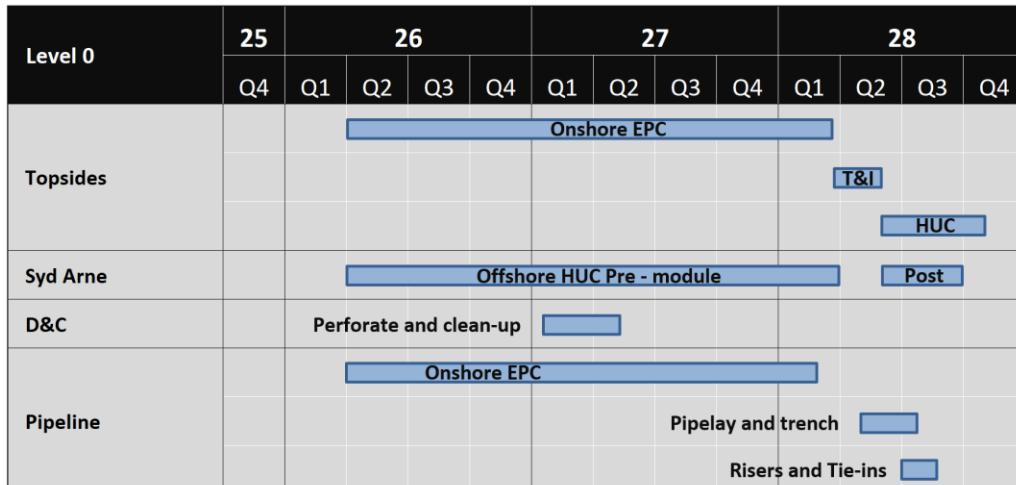


Figure 2-7 High-level time schedule for the Hejre field re-development.

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2.6 Abbreviations

The following abbreviations are used in the document:

| Abbreviation | Explanation |
|-----------------------|--|
| AUD INJ | Acoustic injury, previously known as PTS |
| BAT | Best Available Technique |
| BBL | Barrel |
| BEP | Best Environmental Practice |
| BLP | Bridge Linked Platform |
| BOP | Blow-Out Preventer |
| BOPD | Barrels of Oil Per Day |
| BPD | Barrels Per Day |
| BRL | Background Reference Level |
| CH₄ | Methane |
| CO₂ | Carbon dioxide |
| DCE | Danish Centre for Environment and Energy |
| DEA | Danish Energy Agency |
| DEPA | Danish Environmental Protection Agency |
| DP | Dynamic Positioning |
| DSV | Diving Support Vessel |
| DUC | Danish Underground Consortium |
| DW | Dry Weight |
| EC | European Council |
| EIA | Environmental Impact Assessment |
| EnS-Index | A quantification of environmental status based on descriptors in the Marine Strategy Framework Directive |
| EPC | Engineering, Procurement, Construction |
| ES | Environmental Status |
| ERL | Effect Range Low |
| ETS | Emission Trading System |
| EU | European Union |
| FPSO | Floating Production Storage and Offloading |
| GBS | Gravity Based Structure (the oil storage tank at South Arne) |
| GES | Good Environmental Status |
| GOR | Gas Oil Ratio |
| HELCOM | Helsinki Commission |
| HLV | Heavy Lift Vessel |
| HOCNF | Harmonised Offshore Chemical Notification Form |
| HPHT | High-Pressure High-Temperature |
| HUC | Hook-Up and Commissioning |
| IBTS | International Bottom Trawl Survey |
| ICES | International Council for the Exploration of the Seas |
| IMO | International Maritime Organization |
| JNCC | Joint Nature Conservation Committee |
| LBL | Long Range Baseline |
| MMSCFD | Million Standard Cubic Feet per Day |
| MPU | Mobile Production Unit |
| MSFD | Marine Strategy Framework Directive |

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| | |
|------------------------|---|
| mT | Metric Tonnes |
| NGL | Natural Gas Liquids |
| NH⁴⁺ | Ammonia |
| nmVOC | Non-Methane Volatile Organic Compounds |
| NORM | Naturally Occurring Radioactive Materials |
| NOx | Nitrogen Oxides |
| NPD | Naphthalene, C1-Naphtalene, C2-Naphtalene, C3-Naphtalene, C1-Phenantrene, C2-Phenantrene, C3-Phenantrene, Dibenzothiophene, C1-Dibenzothiophene, C2-Dibenzothiophene, C3-Dibenzothiophene |
| OCP | Organic Chlorine Pesticides |
| OSCAR | Oil Spill Contingency and Response |
| OSPAR | OSlo PARis convention |
| OSRL | Oil Spill Response Limited |
| P&A | Plugging and abandonment (the process for decommissioning of wells) |
| PAH | Polycyclic Aromatic Hydrocarbons |
| PBDE | Poly Brominated Diphenyl Ethers |
| PCB | Poly Chlorinated Biphenyls |
| PEC | Predicted Environmental Concentration |
| PLONOR | Pose Little Or NO Risk |
| PNEC | Predicted No-Effect Concentration |
| POB | Persons On Board |
| PPB | Parts Per Billion |
| PPM | Parts Per Million |
| PTS | Permanent Threshold Shift |
| PUQ | Process, Utility and (living) Quarter |
| RBA | Risk Based Approach (method of assessment of discharges of produced water according to OSPAR) |
| ROV | Remotely Operated underwater Vehicle |
| SA | South Arne |
| SAC | Special Areas of Conservation (under the EU Habitats Directive) |
| SAL | Single Anchor Loading |
| SCANS | Small Cetacean Abundance in the North Sea |
| SEL | Sound Exposure Levels |
| SINTEF | Stiftelsen for INdustriell og TEknisk Forskning |
| SO_x | Sulphur Oxides |
| SPA | Special Protection Area (under the EU Birds Directive) |
| SPL | Sound Pressure Level |
| TA | Temporary Abandonment |
| TD | Total Depth |
| TEL | Target Effect Level - a low range for potential toxicological effect |
| THC | Total Hydrocarbons |
| T&I | Transport and Installation |
| TL | Transmission Losses |
| TTS | Temporary Threshold Shift |
| USBL | Ultra Short Baseline |
| VOC | Volatile Organic Compounds |
| WHP | Well Head Platform |
| WHP-E | (South Arne) Well Head Platform East |
| WHP-N | (South Arne) Well Head Platform North |

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3. National and international legislation

3.1 Environmental impact assessment

An EIA is required in order to obtain an approval for offshore exploration and production of oil and gas and certain industrial plants. This requirement is set forth in Directive 2014/52/EU of the European Parliament and of the Council of 16 April 2014 amending Directive 2011/92/EU on the assessment of the effects of certain public and private projects on the environment. The directive is implemented in Danish legislation through the:

- Subsoil act (Consolidation act no. 1461 of 29/11/2023)
- EIA act (Consolidation act no. 4 of 03/01/2023)
- Offshore habitat order (Executive order no. 846 of 26/06/2024)

The present EIA is compliant with the above-mentioned legislation.

The public hearing process for offshore projects is as follows:

The project owners' application, the environmental impact assessment report will be available on the website of the Danish Energy Agency (DEA), and the public will have the opportunity to comment on the revised EIA through a public hearing phase of a minimum of 30 days. After the hearing period the DEA will decide if a permit for the project will be granted.

Decisions regarding the project and the EIA will be published on the DEA website, and any party with relevant and individual interests in the decision may file a written complaint on environmental issues to the Energy Board of Appeal within four weeks of the publication.

3.2 Protection of the marine environment

3.2.1 Discharges to sea

The Marine Environment Act (Consolidation act no. 147 of 19/02/2024) regulates discharges and emissions from platforms.

The associated regulation on discharges to the sea of compounds and materials from certain marine facilities (Executive order no. 571 of 23/05/2023) defines the information needed to obtain a permission for discharges.

The discharge permit regulates discharge of oil and chemicals to the sea and, among others, define requirements on:

- Maximum oil concentration in discharged produced water
- Limitations for total amount of oil to be discharged
- Monitoring programme for oil concentration in discharge water
- Continuous control of total oil discharge
- Classification of offshore chemicals
- Use and discharge of offshore chemicals depending on classification (explained below).

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- Regular reporting on discharge of oil and chemicals

3.2.2 Classification of offshore chemicals

Chemicals are classified according to the DEPA colour coding system, which follows the OSPAR classification (substitution, ranking and PLONOR) and relates to the environmental hazard of offshore chemicals.

The codes are:

- **Black** chemicals are the most critical and not acceptable to be used offshore.
- **Red** chemicals are environmentally hazardous to such an extent that they should generally be avoided and be substituted where possible. Substances that are inorganic and highly toxic ($EC/LC < 1 \text{ mg/l}$) and/or have a very low biodegradation (< 20% in 28 days) are classified as red. Substances that meet more than one of three criteria of low biodegradation (< 60% in 28 days), high bioaccumulation ($\log Pow \geq 3$ and $MW < 700$) or toxicity ($EC_{50}/LC_{50} < 10 \text{ mg/l}$) are also classified as red.
- **Yellow** chemicals exhibit some degree of environmental hazard, which in case of significant discharges can give rise to concern. Substances that meet one of three criteria of low biodegradation (< 60% in 28 days), high bioaccumulation ($\log Pow \geq 3$ and $MW < 700$) or toxicity ($EC_{50}/LC_{50} < 10 \text{ mg/l}$) are classified as yellow.
- **Green** chemicals are considered not to be of environmental concern (so-called PLONOR-substances that "Pose Little Or NO Risk" to the environment) and also includes organic substances with $EC_{50}/LC_{50} > 1 \text{ mg/l}$, acids and bases categorized as green chemicals.

3.2.3 Regulation of non-indigenous species

Regulation to prevent introduction of non-indigenous species through ballast water regulated through Executive order no. 733 of 19/05/2022 about handling of ballast water and sediments from ship ballast tanks. In addition, introduction of non-indigenous species through ballast water is regulated through the following international conventions and declarations:

- IMO's Convention on the Prevention of Marine Pollution by Dumping of Wastes and other Matter (known as the London Convention 1972) including the 1996 Protocol which became effective in 2006.

3.2.4 Emissions

Air emissions from platforms, drilling rigs and ships are regulated by The Marine Environment Act (Consolidation act no. 147 of 19/02/2024).

In addition, air emissions from platforms are regulated in the regulation on certain air polluting emissions from combustion installations on offshore platforms (Executive order no. 1449 of 20/12/2012).

Order of solid and liquid content of sulphur in fuels (Order no 228 of 06/02/2022) regulates the amount of sulphur allowed in ship fuel and thus indirectly impact the emission from ships.

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3.3 Offshore safety

In order to prevent and mitigate pollution from spills to the sea, contingency plans must be established for offshore platforms that carry out exploration, production and transport of oil hydrocarbons in accordance with the Marine Environment Act (Consolidation act No. 147 of 19/02/2024 § 34a). The mandatory content of such plans is stipulated in the related executive order on emergency preparedness in the event of pollution of the sea from oil and gas plants, pipelines and other platforms (Executive Order No. 909 of 10/07/2015).

In addition, the Offshore Safety Act (Statutory Order No. 125 of 06/02/2018 §45) requires the preparation of contingency plans to prevent and counteract the consequences of major accidents, including major environmental incidents, at the before mentioned facilities.

3.4 Waste

3.4.1 Waste segregation and handling

Waste from the Hejre tie-back to South Arne development will be handled in compliance with the Danish Environmental Protection Act (Consolidation Act No. 1742 of 22/12/2025) and the relevant Executive order on waste No. 1749 of 30/12/2024. Furthermore, the municipality of Esbjerg has a local regulation regarding industrial waste¹ which set out rules for the general handling of waste.

3.4.2 Naturally Occurring Radioactive Material (NORM)

Offshore oil production in the North Sea is associated with contamination of certain parts of the processing equipment by low-level radioactivity substances, known as NORM (Naturally Occurring Radioactive Material).

NORM naturally occurs in the reservoirs in the North Sea; hence NORM may occur in drill cores and cuttings in drilling mud. The radioactive elements occur in chemical compounds in the produced water (formation water) either dissolved in the water or as small particles in the multiphase flow from the wells. NORM also occurs in systems where formation water and sea water are mixed. The radioactive particles or NORM can be accumulated and concentrated in separators (sludge) or deposited as scale in pipes and process equipment due to changes in pressure and temperature. NORM can also occur in the production liner of the wells.

The use (handling, storage, discharge, and disposal etc.) of radioactive substances such as NORM is regulated through The Radiation Protection Act (Executive Order No. 1384 of 18/11/2025 on Ionizing Radiation and Radiation Protection) and its underlying order:

- Executive Order No. 1385 of 18/11/2025 on Radioactive Substances.

The above legislation also regulates the use of sealed radioactive sources.

¹ [Regulativ for erhvervsaffald](#).

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3.5 Natura 2000 areas and protected species

Natura 2000 is a network of nature protection areas established under the EU Habitats Directive and the Birds Directive. The network consists of Special Areas of Conservation (SACs) designated by the member states under the Habitats Directive 92/43/EEC of the Council of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora. The network also consists of Special Protection Areas (SPAs) designated under the Birds Directive 2009/147/EC of the European Parliament and by the Council of 30 November 2009 on the conservation of wild birds. The aim of the network is to ensure the long-term survival of Europe's most valuable and threatened species and habitats.

The directives are implemented in Danish legislation through the:

- Environmental Goal Act: Consolidation act No. 692 of 26/05/2023
- Subsoil Act: Consolidation act No. 1461 of 26/11/2023
- EIA Act: Consolidation act No. 4 of 03/01/2023
- Habitat Act: Executive order No. 1098 of 21/08/2023
- Offshore habitat order: Executive Order No. 846 of 26/06/2024

Prior to any decision on projects with potential impact on a Natura 2000 area or a protected species (Annex IV), documentation must be presented that the activity will not lead to negative effects on the favourable conservation status of species or habitats that are part of the selection basis or affect the integrity of the area or species negatively.

3.6 Espoo Convention

Convention on Environmental Impact Assessment in a Cross-border Context, the Espoo Convention from 1991, sets out obligations of parties to assess the environmental impact of certain activities at an early stage of the planning. The convention also lays down a general obligation on the Member states to notify and consult each other on all major projects that are likely to have a significant adverse environmental impact across boundaries.

The Danish Environmental Protection Agency is the Danish Point of Contact for notifications regarding to the Espoo Convention and thus also takes care of the notifications and consultation of other countries according to the Espoo convention for projects where the DEA is the competent authority.

3.7 OSPAR Convention

The Convention for the Protection of the Marine Environment of the North-East Atlantic or OSPAR Convention is the main legislative instrument regulating international cooperation regarding the marine environment in the North Sea. The Convention regulates international cooperation in the North-East Atlantic and sets European standards for the offshore oil and gas industry, marine biodiversity and baseline monitoring of environmental conditions. The focus of the convention is on BAT, BEP and clean technologies.

The OSPAR Convention has implemented several strategies on environmental issues such as hazardous substances, biodiversity and radioactive compounds. The strategies include prohibition of the discharge of oil-based mud (OBM), and how drill cuttings are managed in the construction phase. In addition, hazardous substances are regulated after principles of substitution, where less hazardous substances or preferably non-hazardous substances substitute these substances if possible. The Convention requires a HOCNF (Harmonised Offshore Chemical Notification Format) and a pre-screening of substances in relation to their

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toxicity, persistence and biodegradability. Compounds that cannot be substituted must be ranked if not listed on the PLONOR (Pose Little Or No Risk) list, which contains the substances with no or little environmental effect.

The OSPAR Commission recommends an elimination of discharges of produced water, so that by 2020 the discharge of produced water will not result in unwanted effects in the marine environment. Discharged produced water should not contain more than 30 mg dissolved oil per litre calculated as a monthly average. The Commission has established a risk-based approach (RBA) to assess the discharge of produced water. The RBA recommendation 2012/5 and the associated RBA guideline 2012-07 were adopted in 2012 and latest updated in 2021.

OSPAR agreement 2017-02 recommends procedures for monitoring of environmental impacts of discharges from offshore installations including monitoring of sediment and water column characteristics. The monitoring programmes should comprise both baseline surveys prior to any petroleum development and follow-up surveys during exploration, production and decommissioning.

In OSPAR decision 98/3, with latest update in 2024, on the disposal of disused offshore installations, OSPAR sets up the rules for leaving disused installations offshore. A disused offshore installation is defined as an offshore installation that no longer serves the purpose it was originally placed in the area for or not serving another legitim purpose. Offshore pipelines are not covered by the decision.

The general rule is that offshore installations are not allowed to be left in a maritime area. Derogation from decision 98/3 may be considered for parts of an installation if certain conditions are met.

In order to fulfil the commitments on Annex V on the protection and conservation of the ecosystems and biological diversity of the maritime area, the OSPAR agreement 2008-6 List of Threatened and/or Declining Species and Habitats have been made. In this list a number of vulnerable species and habitats within the OSPAR region have been identified. These species and habitats are to be protected from adverse impacts by human activities, in accordance with the obligations defined under the OSPAR Annex V.

3.8 Energy and climate

3.8.1 CO₂ emissions

To reduce industrial greenhouse gas emission and to combat climate change, the EU has set up an emission trading system (EU ETS) for emission allowances of greenhouse gas. The system is set forth in Directive 2003/87/EC of the European Parliament and by the Council of 13 October 2003 on establishing a scheme for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC (later replaced by Directive 2010/75/EC). The system is implemented in Danish legislation through the CO₂ Quotas Act (Consolidation act no. 1353 of 02/09/2020).

The EU Commission lays down rules for the monitoring and reporting of greenhouse gas emissions and activity data pursuant to EU Directive 2003/87/EC in the trading period that commenced on 1 January 2021 (EU Commission implementing regulation (EU) 2018/2066 of 19 December 2018).

An Addendum to the EIA for the development of the Hejre field has been prepared following the decision of the Danish Energy Board of Appeal (Energiplagenævnet) dated 11 November 2025, which annulled the Danish Energy Agency's approval of the revised development plan for the Hejre field and remitted the case for reconsideration.

The Energy Board of Appeal found that the EIA did not include a description of the Project's indirect effect on the climate resulting from the combustion of hydrocarbons extracted under the permit. On this basis, the Board assessed that the EIA was not suitable as a sufficient basis for decision-making when the climate

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impacts resulting from the combustion of the extracted hydrocarbons were not included and addressed in the EIA. The Board has not thereby taken a position on whether there will be a significant impact on the climate as a result of the burning of the extracted hydrocarbons.

INEOS E&P A/S disagrees with the Board's decision, including its interpretation that it should be required, including pursuant to the EIA Directive, to assess the impact of the combustion of the extracted hydrocarbons as part of its environmental impact assessment of the project. However, the Board annulled the approval of the revised development plan for the Project, and the Addendum has been prepared to adapt to the Board's decision solely for INEOS to expedite a renewed approval. Accordingly, INEOS maintains the right to challenge the Board's decision before the Danish Courts and disagrees with the view that the assessment of indirect climate effects in an EIA requires a scope 3 assessment.

The methodology and terminology applied in the Addendum are without prejudice to the approaches applied to any other project when assessing their "indirect effects" in an EIA. INEOS E&P A/S, in consultation with the Danish Energy Agency, has been referred to conduct an assessment in alignment with the United Kingdom Department for Energy Security & Net Zero (DESNZ) guidance, "Environmental Impact Assessment (EIA) – Assessing effects of downstream scope 3 emissions on climate. Supplementary guidance for assessing the effects of downstream scope 3 emissions on climate from offshore oil and gas projects" (DESNZ, 2025).

3.8.2 Climate partnership

The Danish Government has decided that Danish emission of CO₂ shall be reduced with 70% in 2030 compared to the emissions in 1990. This takes place through the Climate act (Consolidation act no. 2580 of 13/12/2021).

The Government invited Danish companies to participate in Climate Partnership to develop ideas to meet the goal for 2030 through the Confederation of Danish Industry (DI).

The oil and gas industry gave input to the Partnership agreement within the areas of:

- Energy efficiency
- Electrification of the installations using common power infrastructure in the North Sea for example from wind power plants
- Carbon Capture and Storage (CCS)
- Hydrogen production, transportation and storage.

The final climate partnership agreement was finalized in March 2020 and published by the Danish Council on Climate Change in the report "Known paths and new tracks to 70 percent reduction", yearly action plans has been developed since.

Some of the initiatives were initiated in the first Danish oil and gas energy efficiency action plan 2008-2011 agreed between the Minister of Energy and Climate and the Danish Operators in April 2009, which was followed by a second action plan for 2012-2014. The main focus areas were the operators' commitment to implement energy management as part of their existing environmental management system, to improve energy efficiency, to lower energy consumption and to lower flaring. These measures are still in place.

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3.9 Marine Strategy Act

The EU has a marine strategy that aims to maintain or establish a 'Good Environmental Status' (GES) in all European marine areas by 2020. This strategy is set forth in Directive of the European Parliament and by the Council of 17 June 2008 on establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive). The directive is implemented in Danish legislation through Marine Strategy Act (Consolidation act no. 123 of 01/02/2024).

The Danish Ministry of Environment defines what is regarded as 'Good Environmental Status' of the marine environment using 11 different descriptors. For each descriptor a set of qualitative environmental targets and preliminary indicators are set. In Table 3-1 all 11 descriptors are listed together with relevant environmental targets.

Table 3-1 Overview of the 11 MSFD descriptors and a short description of the environmental targets.

| | Descriptors | Relevant environmental targets |
|-----------|--|---|
| D1 | Biodiversity (birds) | Populations and habitats for birds are conserved and protected in accordance with objectives under the Birds Directive |
| D1 | Biodiversity (mammals) | Harbour porpoise, harbour seal and grey seal achieve favourable conservation status in accordance with the timeline laid down in the Habitats Directive |
| D1 | Biodiversity (pelagic habitats) | The abundance of plankton follows the long-term average. |
| D2 | Non-indigenous species | The number of new non-indigenous species introduced through ballast water, ship fouling and other relevant human activities is decreasing |
| D3 | Commercially exploited fish stocks | Within the framework of the Common Fisheries Policy, spawning biomass exceeds the level that can ensure a maximum sustainable yield. |
| D4 | Marine food webs | The relevant environmental targets under descriptor 1 (biodiversity) and descriptor 3 (commercial exploited fish stocks) |
| D5 | Eutrophication | Danish part of discharges of nitrate and phosphorus (TN, P) follows the maximal acceptable discharges set in HELCOM. |
| D6 | Sea floor integrity (losses and physical impacts) | In connection with licensing offshore activities requiring an environmental impact assessment (EIA), the approval authority encourages assessment and reporting to the Danish Environmental Protection Agency (monitoring programme) of the extent of physical losses and physical disturbances of benthic broad habitat types. |
| D6 | Sea floor integrity (habitat types on the sea floor) | The marine habitat types under the Habitats Directive achieve favourable conservation status in accordance with the timeline laid down in the Habitats Directive |
| D7 | Alteration of hydrographical conditions | In connection with licensing offshore activities requiring an environmental impact assessment (EIA), the approval authority is encouraging reporting to the Danish Environmental Protection Agency (monitoring programme) of hydrographical changes and the adverse effects of these. |
| D8 | Contaminants (concentrations and species health) | Discharges of contaminants in the water, sediment and living organisms do not lead to exceeding of the environmental quality standards applied in current legislation. |

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| | Descriptors | Relevant environmental targets |
|------------|---|---|
| D8 | Contaminants (acute pollution events) | <p>The spatial extent and duration of acute pollution events is gradually reduced as much as possible through prevention, monitoring and risk-based scaling of contingency and response facilities</p> <p>Adverse effects on marine mammals and birds from acute pollution events are prevented and minimised as much as possible. For example, this may be secured by means of floating booms as well as through contingency plans for marine mammals and birds injured in oil spills.</p> |
| D9 | Contaminants in fish and other seafood for human consumption. | <p>Emissions of contaminants generally do not lead to exceeding the maximum residue levels applicable in the food legislation for seafood.</p> <p>The trend in total Danish dioxin emissions into the air is not increasing.</p> |
| D10 | Marine litter | The amount of marine litter is reduced significantly in order to achieve the UN goal that marine litter is prevented and significantly reduced by 2025. |
| D11 | Underwater noise | As far as possible, marine animals under the Habitats Directive are not exposed to impulse sound which leads to permanent hearing loss (PTS). The limit value for PTS is currently assessed as 200 and 190 dB re.1 uPa ² s SEL for seals and harbour porpoise, respectively. The best knowledge currently available is on these species. |

It should be noted that the environmental status has not been mapped for all descriptors and thresholds are only defined for a few descriptors (contaminants and underwater noise).

OSPAR is currently working on a common framework of indicators and assessment values to be used in the Northeast Atlantic. In this EIA, a draft version of the list of indicators has been used to assess the impact of the project on the objectives of the Marine Strategy.

Eight areas in the North Sea have been appointed as marine protected areas according to the Marine Strategy Framework Directive. Activities within these areas are strictly regulated, however neither Hejre nor South Arne are located within one of these areas.

3.10 Maritime spatial plan

Maritime spatial planning is regulated through the Danish legislation in the Act on Maritime spatial planning (Consolidation act no. 400 of 06/04/2020).

The Danish Maritime Authority is responsible for establishing Denmark's first maritime spatial plan. The maritime spatial plan is to form the basis of the coordination of the many uses of Denmark's sea area in a manner that can support the conditions for sustainable growth in Blue Denmark. The maritime spatial plan is to establish which sea areas in Danish waters can be used for *inter alia*, offshore energy extraction, shipping, fishing, aquaculture, seabed mining and environmental protection towards 2030.

The maritime spatial plan 2.0 is currently through the process of public hearing and awaits final adoption. The areas of spatial planning at sea of relevance are primarily the zones for offshore energy exploration, see Figure 3-1.

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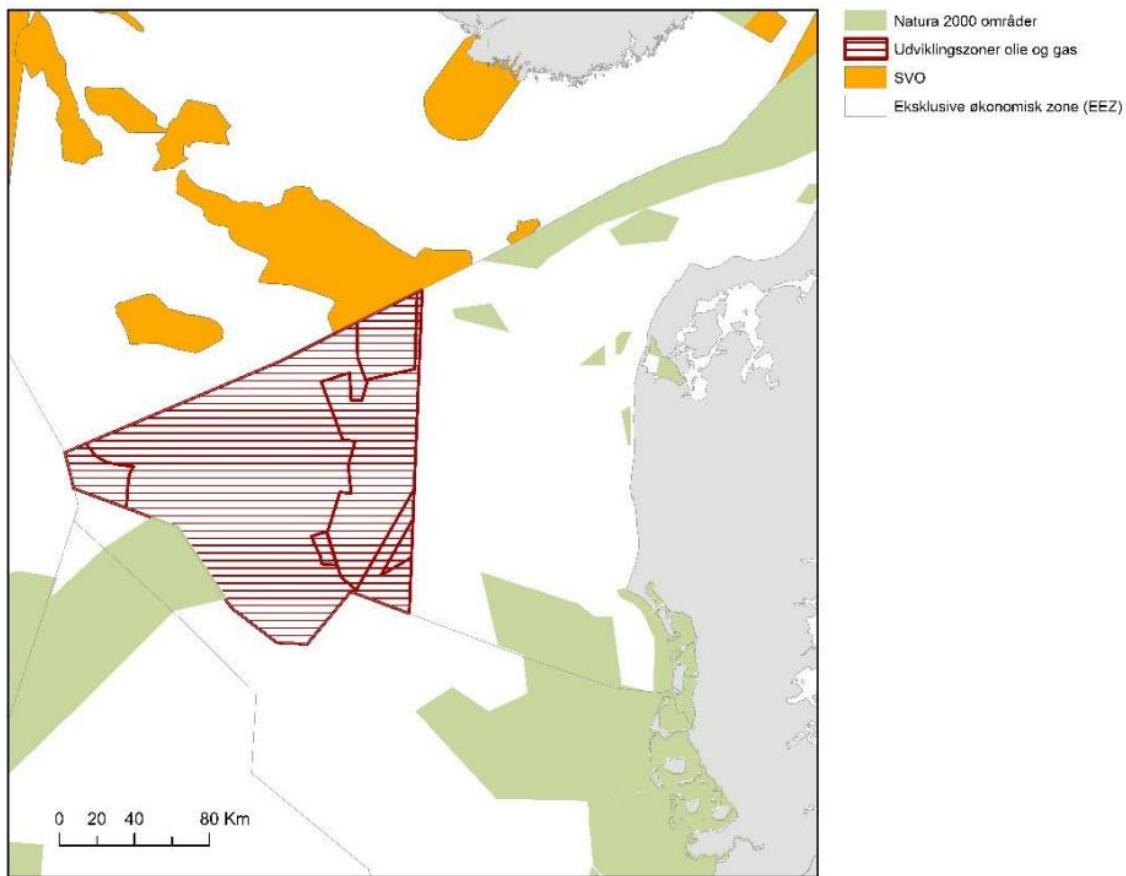


Figure 3-1 Development zone for oil and gas exploration in relation to Norway SVO-areas (especially valuable areas) and Natura 2000 areas in German and Danish sector (COWI, 2021).

3.11 Decommissioning

Decommissioning is regulated through Danish legislation in the Subsoil Act (Consolidation act no. 1461 of 29/11/2023) and the Marine Environment Act (Consolidation act no. 147 of 19/02/2024).

According to the subsoil act decommissioning plans for offshore oil and gas installations shall be prepared, submitted and approved by the DEA before the installations can be removed. DEA has prepared a guideline for these decommissioning plans "Guideline on decommissioning plans for offshore oil and gas facilities or installations" dated August 2018. The guideline explains the legal framework and the required contents of the plans. A new guideline on decommissioning plans for offshore production and transport of oil and gas has been in review in September 2025, however no final version has been published yet.

In addition, decommissioning is regulated through the following international conventions and declarations.

- IMO's Convention on the Prevention of Marine Pollution by Dumping of Wastes and other Matter (known as the London Convention 1972) including the 1996 Protocol which became effective in 2006.

The London Convention is a global convention that aims at protecting the marine environment from human activities by promoting control of sources of marine pollution and by taking steps to prevent pollution of the ocean. Under the convention all dumping of waste is prohibited except certain types of waste listed on the convention's 'reverse list'.

- Ministerial Declaration of the Ninth Trilateral Governmental Conference on the Protection of the Wadden Sea (known as the Esbjerg Declaration 2001).

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- OSPAR Commission's OSPAR Convention (1992 and 1998), Annex III on Prevention and elimination of pollution from offshore sources, Decision 98/3 on Disposal of disused offshore installations, and recommendation 77/1 on Disposal of pipes, metal shavings and other material resulting from offshore petroleum hydrocarbon exploration and exploration operations. Regarding decommissioning, the Esbjerg Declaration states that more environmentally acceptable and controllable land-based solutions are preferred, and that decommissioned offshore installations therefore shall either be reused or be disposed on land.

The OSPAR Commission establishes the framework for decommissioning including guidelines and procedures. Recommendation 77/1 states that dumping of bulky waste such as pipes and containers is prohibited without special permission excluding inter-field pipelines. All dumping or leaving wholly or partly in place of offshore installations in the North Sea is prohibited according to Decision 98/3. However, derogation from this regulation is possible when there are significant reasons why an alternative disposal is preferred. Decision 98/3 does not include decommissioning of pipelines.

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4. Alternative concepts

The chosen concept for the Hejre re-development is the Hejre tie-back to South Arne concept described in detail in Chapter 5. A number of alternative concepts have been considered and studied during the feasibility phase of the Hejre re-development project and are described in this chapter. An overview of the alternative concepts is shown in Table 4-1. Alternatives considered since 2017 have been included, and each presented in more detail in the following sections including the 0-alternative.

The selected concept has been measured on a number of parameters against alternatives and deemed to be the optimal concept across these parameters. These parameters include:

- **Economic feasibility:** The Hejre tie-back to South Arne concept is the most attractive financial concept, driven by the relatively small construction scope at Hejre and new pipelines and the utilization of existing infrastructure in the form of the South Arne installation.
- **Environmental impact:** Due the smaller construction scope, the environmental impact from the selected concept is similar smaller when comparing to alternatives. The design with no flare at Hejre also reduces the environmental impact.

Table 4-1 Overview of alternatives considered during the re-development of the Hejre project

| Concept | Description | Type | Status | Comment |
|--|--|-------------|--------------|---|
| <i>Process, Utility and Quarter (PUQ) Topsides</i> | New process, utility and living quarter platform at Hejre for processing of Hejre fluids. Use of existing Hejre jacket and pre-drilling wellhead module. Use of existing export routes from Hejre. Various configurations within the overall concept investigated such as inclusion of third-party fields (e.g Solsort) as joint development. | Stand-alone | Screened out | Not economically viable. Evaluation based on significant reduction of the modelled reserves as compared to the original assessment and part of the Hejre legacy sanctioning basis. |
| <i>Mobile Production Unit (MPU)</i> | Converted jack-up drilling rig with process module located at the Hejre field for processing of the Hejre fluids. Use of existing Hejre jacket and pre-drilling wellhead module. Use of existing export routes from Hejre. Various configurations within the overall concept investigated such as different export specifications. | Stand-alone | Screened out | Not economically viable. Technology not used in Danish sector, which includes a risk of a longer process for approval. |
| <i>Valhall tie-back</i> | Tie-back to Valhall (Norway) through a new multiphase pipeline from Hejre to Valhall. New Bridge Linked Platform (BLP) at Valhall for processing of Hejre fluids. Use of existing Hejre jacket and pre- | Tie-back | Screened out | Not economically viable. No available capacity at Valhall before after 2030 requiring establishment of new BLP. |

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| | drilling wellhead module. | | | |
| <i>Harald tie-back</i> | Tie-back to Harald through a new multi-phase pipeline from Hejre to Harald. Umbilical for supply of power, chemicals etc. from Harald to Hejre. New module at Harald for processing of Hejre fluids. Use of existing Hejre jacket and pre-drilling wellhead module. | Tie-back | Screened out | The concept is considered less economical viable. The modifications at Harald are quite extensive including large risk of delay and cost increase. NGL extraction facility required at Nybro gas treatment plant. Due to the need for onshore processing this solution will also have a significantly higher power consumption and by that a higher climate change impact. |
| <i>Siri tie-back</i> | Tie-back to Siri through existing Hejre gas export pipeline to the South Arne Harald WYE ² at which a new 43 km pipeline is established to Siri. A new gas export pipeline from Siri to tie in at Tyra East. New manned topside at Hejre with living quarter. Modifications at the Siri platform. Use of existing Hejre jacket and pre-drilling wellhead module. | Tie-back | Screened out | The concept is considered less economical viable. The pipelay scope and topside scope at Hejre is more extensive than the Hejre tie-back to South Arne. |

4.1 0-alternative

A situation in which the present project is abandoned is interpreted as a status quo alternative, where no production will take place from the Hejre field. Consequently, the Hejre wells will be plugged and abandoned, the Hejre jacket will be removed, and the pipelines emptied and left buried in the seabed for *in situ* disposal if permitted by Authorities.

The environmental impact from the 0-alternative will be limited to emissions to air from use of vessels and disturbance of the seafloor during the decommissioning of the existing structures and discharge of treated seawater from the pipelines.

The offshore oil and gas production is important for the Danish economy though. According to Oil and Gas Denmark's report "The green transition – our shared responsibility" from 2019, thousands of people are employed in full-time jobs related to the offshore extraction industry, and the state benefits from the tax contribution from the oil and gas business are in the area of 5 billion DKK with an expected increase for the coming years to around 10-15 billion until 2037.

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At present, Denmark can still not rely on renewable energy alone, and the political decided transition to renewable energy and reduction of carbon emissions whilst ensuring secure energy supplies means that the need for fossil fuels remains for the lifetime of the Hejre production. It is stated in Denmark's integrated National Energy and Climate plan from December 2019 that Denmark is expected to be independent of fossil fuels in 2050. Until then, fossil fuels are still an integral part of a diverse energy mix and the re-development of the Hejre field is very much in line with the current Danish energy policy.

The consequences of a scenario where the Hejre field is not developed Denmark will face negative consequences in terms of a lower tax income, no positive socioeconomic effects (employment, financial benefits) and a lower level of national energy supply security. On the other hand, if the 0-alternative is chosen and the field is not developed for production, the consequences may involve less direct environmental impact on the Danish North Sea.

4.2 Stand-alone concepts

4.2.1 Process, utility and quarter (PUQ) topsides at Hejre

This concept comprises the establishment of an integrated wellhead, process, utility and accommodation platform at the Hejre field. The topside is configured to interface the existing 8-legged jacket and the predrilling wellhead deck installed in 2014.

The concept is comprised of two different process system variations, one where the produced gas is exported at sales gas specifications, and one exporting gas as rich gas. In both cases, nitrogen injection would be required onshore at Nybro to meet the gas export quality specifications. For the rich gas export concept, further modifications onshore at Nybro would be required to treat the rich gas.

In addition, a combined development with a Solsort tie-back was investigated, as well as various sizes of the living quarter.

Irrespectively of the various configurations investigated, this concept is to a very large degree similar to the cancelled Hejre Legacy project but based on significant reduction of the modelled reserves as compared to the original assessment and part of the Hejre Legacy sanctioning basis, a stand-alone re-development of Hejre can no longer be economically substantiated.

From an environmental perspective, the integrated PUQ at Hejre concept would be of equal or worse impact when compared to the selected concept, due to the following considerations:

- Installation of the PUQ at Hejre would be with a larger installation vessel and of similar duration as for the unmanned Hejre topside (Hejre tie-back to South Arne). Having a higher fuel consumption per day this is expected to have a marginally larger negative impact on the environment compared with the Hejre tie-back to South Arne concept.
- As the existing export pipelines from Hejre Legacy are not completed, vessels would still be required for completion of the pipeline scope and for laying new pipelines. This is a marginal improvement on the environmental impact compared with the Hejre tie-back to South Arne concept due to less offshore duration for the pipelay installation vessels.
- Chemicals used during production will be the same as for the Hejre tie-back to South Arne concept, with the only difference being location of processing and injection. No difference in environmental impact.

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- Produced water discharge will take place at Hejre with no reinjection possibilities. For Hejre tie-back to South Arne produced water will be reinjected at South Arne and no produced water will be discharged at Hejre. Negative impact on the environment compared with the Hejre tie-back to South Arne concept.

Based on the above, no environmental benefits are seen from the PUQ topsides at Hejre concept when compared to the Hejre tie-back to South Arne concept.

Mobile Production Unit (MPU) at Hejre

This concept comprises a process and utility module integrated into the jack-up rig. The rig is located at the Hejre field with interface to the existing 8-legged Hejre jacket. The jacket will be modified to integrate a cooling module next to the pre-drill module.

The concept is comprised of two different variations, one exporting Sales Gas and one exporting rich gas. In both cases nitrogen injection would be required onshore at Nybro to meet the gas export quality specifications. For the Rich Gas export concept, further modifications onshore at Nybro would be required to treat the rich gas.

In addition, a combined development with a Solsort tie-back was investigated, as well as configurations where the process and utility module were located at the Hejre jacket, and the jack-up rig was only used for living quarters and utility equipment.

From an environmental perspective, the MPU at Hejre concept would have a similar or worse impact compared to the selected base case concepts, due to the following considerations:

- A jack-up rig would be permanently positioned at Hejre for the length of production. Towing the jack-up rig to site, permanent impact on the seabed etc. would have a negative impact on the environment compared with the Hejre tie-back to South Arne concept, where such activities are not taking place.
- Installation of a module/equipment at Hejre would still be required with similar vessels and duration as for the unmanned WHP (Hejre tie-back to South Arne). No difference in environmental impact.
- As the existing export pipelines from Hejre Legacy are not completed, vessels would still be required for completion of the pipeline scope. Marginal improvement on the environmental impact compared with the Hejre tie-back to South Arne concept due to less offshore duration for the pipelay installation vessel.
- Chemicals used during production will be the same as for the Hejre tie-back to South Arne concept, with the difference only being location of processing and injection. No difference in environmental impact.
- Produced water discharge will take place at Hejre with no reinjection possibilities. For Hejre tie-back to South Arne produced water will be reinjected at South Arne and no produced water will be discharged at Hejre. Negative impact on the environment compared with the Hejre tie-back to South Arne concept.

Based on the above, no environmental benefits are seen from the MPU at Hejre concept when compared to the Hejre tie-back to South Arne concept.

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4.3 Tie-back concepts

4.3.1 Valhall tie-back

This concept is based on tie-back to the Valhall platform in Norway and the need for a new BLP at Valhall. The concept consists of a Hejre unmanned WHP with a multiphase pipeline to connect to the new Valhall BLP for processing of Hejre fluids. Oil and gas export will be through existing Valhall export routes.

From an environmental perspective, the Valhall tie-back concept would be of a similar or worse impact compared to the selected concepts, due to the following considerations:

- Installation of a module/equipment at Hejre still required with similar vessels and duration as for the unmanned WHP (Hejre tie-back to South Arne). No difference in environmental impact.
- Similar (compared to Hejre tie-back to South Arne) installation of new pipelines and umbilical. Similar or marginal negative environmental impact.
- New jacket and topside (BLP) required at Valhall with associated installation campaign. Negative environmental impact compared with the Hejre tie-back to South Arne concept.

Based on the above, no environmental benefits are seen from the Valhall tie-back concept when compared to the Hejre tie-back to South Arne concept.

4.3.2 Harald tie-back

The Hejre tie-back to Harald concept comprises a multiphase tie-back from an unmanned wellhead platform at Hejre to the Harald platform. An umbilical from Harald to Hejre will provide Hejre with power, communication line, chemicals etc.

The multiphase production is exported through a new 22.5 km multiphase pipeline for processing at the Harald platform. The Harald live oil is exported through the existing Hejre to Harald WYE gas export pipeline to Hejre and from Hejre to shore through the existing Hejre to Gorm E pipeline and onwards to Fredericia Oil Terminal. The Hejre gas is exported directly from Harald through the existing gas export pipeline to the Nybro Gas treatment plant for further onshore processing to knock-out NGL and condition gas to export specifications.

From an environmental perspective, the Harald tie-back concept would be of a similar impact compared to the selected concepts, due to the following considerations:

- Installation of an unmanned topside at Hejre would still be required, with similar vessels and duration as for the unmanned WHP (Hejre tie-back to South Arne). No difference in environmental impact.
- Same level (compared to Hejre tie-back to South Arne) installation of new pipelines and umbilical. Comparable environmental impact.
- Installation of a new module and modification at the Harald platform – new module including separation, compression and power generation will be installed and debottlenecking of existing equipment. Similar environmental impact compared with the Hejre tie-back to South Arne concept due to similar vessel days for the heavy lift vessel.
- New gas conditioning plant onshore at the Nybro gas treatment plant. Negative environmental impact compared with the Hejre tie-back to South Arne concept as no onshore activities are expected, as the normal export of oil from South Arne is used and the Hejre gas is exported via the

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South Arne system to Nybro. The NGL's will be injected and stored. The energy consumption needed for onshore treatment at Nybro is at the same magnitude as for the offshore treatment, which makes this solution less energy efficient compared to the Hejre tie-back to South Arne solution only including offshore processing.

Based on the above, no environmental benefits are seen from the Harald tie-back concept when compared to the Hejre tie-back to South Arne concept.

4.3.3 Siri tie-back

The Hejre tie-back to Siri concept comprises a manned topside with living quarters and multiphase tie-back to the host Siri where well fluids are processed.

The multiphase production from Hejre will be exported using the existing 24 km gas export pipeline to the South Arne Harald WYE at which a new 43 km pipeline will need to be established to Siri.

The Hejre oil will be produced to the Siri oil storage tank and exported by shuttle tanker like the Siri oil. The gas will be exported through a new gas export pipeline to Tyra East and connection to the NOGAT system as Siri do not, at present, have any export infrastructure for gas (produced gas at Siri is used for gaslift and fuel and a minor volume is reinjected).

From an environmental perspective, the Siri tie-back concept would be of a similar or more negative impact compared to the selected concept, due to the following considerations:

- Installation of a manned topside at Hejre would be required, with similar vessels and longer duration as for the unmanned WHP (Hejre tie-back to South Arne). Marginal negative environmental impact compared to Hejre tie-back to South Arne.
- Larger scope of (compared to Hejre tie-back to South Arne) installation of new pipelines and umbilical. For Hejre to Siri approx. 67 km pipeline is installed, where the scope for Hejre tie-back to South Arne is reduced significantly to approx. 30 km. Negative environmental impact.
- Only brownfield modifications at Siri (Hejre-Siri), compared to a new tie-in module at South Arne (Hejre-South Arne) which requires dedicated vessel. Marginal positive environmental impact.

Based on the above, no environmental benefits are seen from the Siri tie-back concept when compared to the Hejre tie-back to South Arne concept.

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5. Technical description of the Hejre tie-back to South Arne concept

5.1 Field description

The Hejre field is located within licence 5/98 on the Danish continental shelf approximately 300 km west of the Danish west coast. The field is a High-Pressure High-Temperature (HPHT) oil field with associated gas.

The Hejre jacket is located at the position 6.234.174,9 mN, 559.510,8 mE (reference UTM zone 31 on ED50 Datum) at approximately 68 m water depth.

The Hejre field, located in the southern part of the Central Graben, is dominated by extensive Late Jurassic rifting and subsequent Late Cretaceous inversion. The Gertrud Graben is bounded by the Mona fault and Piggvar Terrace towards the north, the Gerd Ridge towards the southwest and the Heno Plateau towards the south. The Gertrud Graben itself continues towards the northwest and merges with the Feda Graben. Below shows the extent of the interpretation used as input to the structural project.

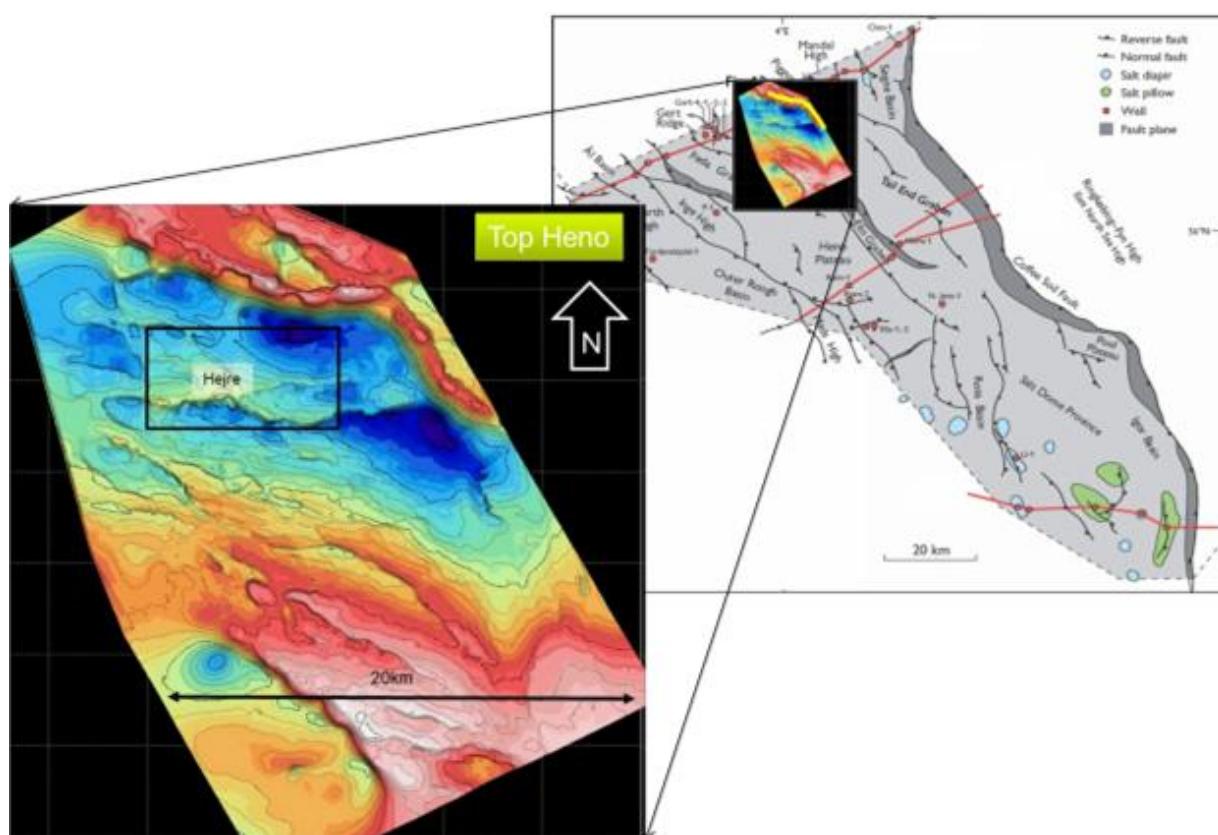


Figure 5-1 The Hejre area interpretation.

The Hejre field comprises several large segments, which are bounded by faults. Within the main Hejre field three of the main segments have been penetrated by exploration/appraisal and development wells and are considered as proven recoverable resources.

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To date, 7 wells (including discovery well, Hejre-1 and appraisal well, Hejre-2) and 2 side-tracks (HA-1A and HA-3A) have been drilled on the Hejre field encountering the Gert reservoir in seven penetrations. Cores from 4 wells have been retrieved and provide crucial information to reservoir characteristics, interpretation of facies and depositional environment. Extensive sampling and analytical programming have been performed to characterise the sediment and diagenetical history. An overview of the drilled wells is shown on Figure 5-2.

Production is planned to take place from three of the existing Hejre wells HA-1A, HA-2 and HA-4, one in each segment of the Hejre field. The characteristics of the Hejre reservoir are provided in Table 5-1.

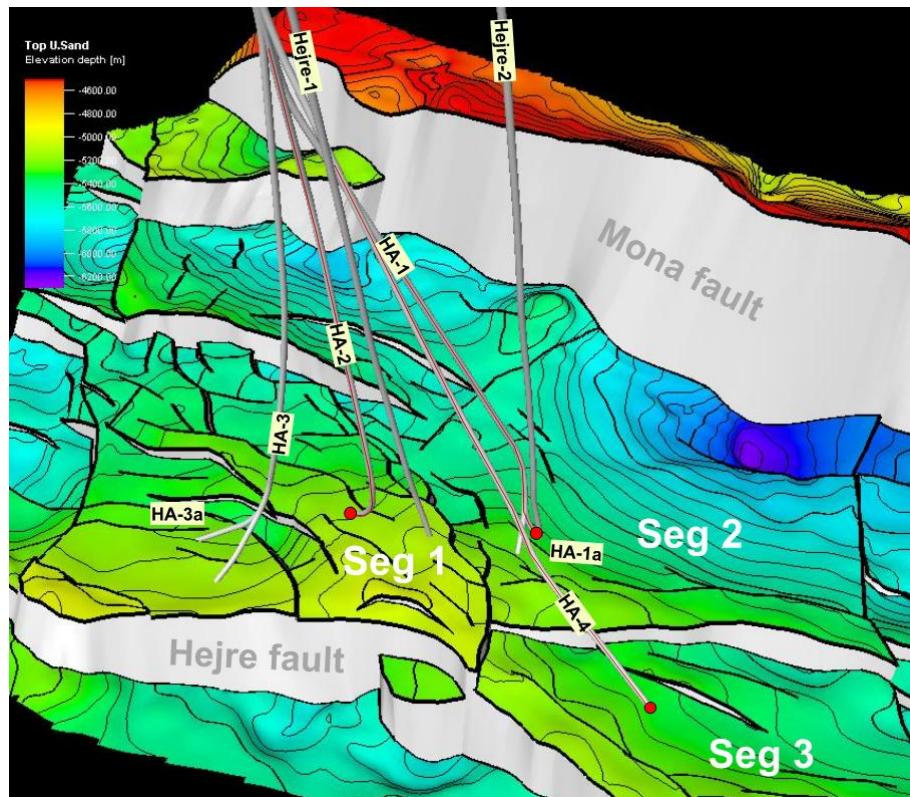


Figure 5-2 Overview of the 7 wells and 2 side-tracks drilled on the Hejre field.

Table 5-1 Hejre reservoir and fluid characteristics.

| Parameter (unit) | Value |
|----------------------------|-------------------------------|
| Reservoir depth (m) | 5000-5500 |
| Reservoir pressure (bar) | 1000 |
| Stratigraphy/Sedimentology | Jurassic shallow marine sands |
| Reservoir temperature (°C) | 160 |
| Reservoir thickness (m) | 1-70 |
| Oil density (API) | 44 |
| GOR (SCF/STB) | 1300-2250 |

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5.2 Project overview

The Hejre tie-back to South Arne development concept comprises a remotely controlled unmanned topside at Hejre and multiphase tie-back to the host South Arne where well fluids are processed. The multiphase production from Hejre will be exported to South Arne through a new 33 km multiphase pipeline.

The Hejre oil will be processed at South Arne main platform and produced to the South Arne Gravity Based Structure (GBS) for storage and exported by shuttle tanker like the South Arne oil, i.e., utilizing the existing South Arne oil export facilities. The gas will be exported through the existing South Arne to Nybro pipeline. NGL's will be injected at the host platform, South Arne, into the South Arne reservoir and will remain there.

The Hejre tie-back to South Arne project includes:

- Construction and installation
 - Construction and installation of a new unmanned topsides at Hejre
 - New fortified riser will be installed at Hejre
 - Perforation, clean-up and well test of 3 existing Hejre wells. Remedial cement plug in HA-5
 - Modifications at Hejre jacket to remove the temporary items left over from the original installation in 2014.
 - Hook-up between the Hejre pre-drilling wellhead module installed in 2014 and the new topside.
 - Modification at the South Arne WHPE – a new tie-in module with a slug catcher, multiphase pig receiver and new caisson with riser and power cable to be installed
 - Tie-in scope at South Arne Main – removal of obsolete degasser unit and new NGL injection and booster pumps to be installed
- Laying and commissioning of pipeline and power cable
 - 33 km 10" or 12" multiphase pipeline from Hejre tie-back to South Arne
 - Installation of power cable with fibre optic from South Arne to Hejre with power and control from host
- Production
 - Processing of Hejre well fluids at South Arne for a maximum of 19 years from 2028-2047
 - Operation and maintenance of multiphase pipeline and power cable
 - Operation and maintenance of Hejre platform and wells
- Decommissioning
 - Close-in, plug and abandonment of Hejre wells
 - Flushing and dismantling of platform and subsea structures
 - Empty Hejre-South Arne pipeline and prepare for *in situ* disposal below seabed if permitted by Authorities
 - If *in situ* is not permitted the pipeline and power cable will be prepared for removal by the following methodology
 - Pipeline path will be dredged and Reverse Reeling, Reverse S lay or Cut and Lift method will be applied. For Reverse Reeling and S lay a Pipelay Vessel will be

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used. In case the Cut and Lift method is used an Offshore Construction Vessel could be used. A Comparative Assessment will be performed to determine the best solution

- Removal of the power cable will be a reverse reeling back to an Offshore Construction Vessel and stored on carousels onboard the vessel
- Pipeline and power cable will be disposed onshore

5.3 Existing installations

5.3.1 Hejre jacket and wellhead module

The existing Hejre structure comprises of an 8-legged steel jacket and a pre-drilled wellhead deck which were installed in 2014. Figure 5-3 shows the Hejre jacket present day (pictures taken in year 2019 during a maintenance campaign):

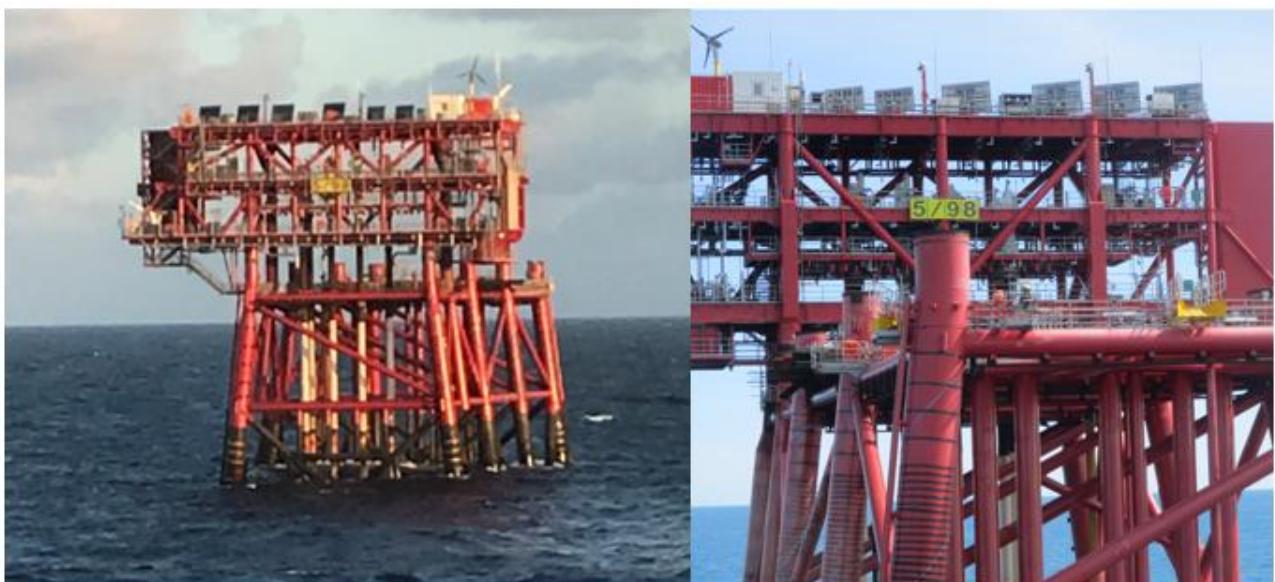


Figure 5-3 The Hejre Jacket.

5.3.2 Hejre wells

Five HPHT wells have been drilled from the Hejre platform including two side-tracks. Drilling was completed in 2016 as part of Hejre Legacy,

Three of the wells (HA-1A, HA-2 and HA-4) have been drilled and completed with a 5-1/2" cemented liner across the reservoir and 5-1/2" production tubing to surface and Xmas Tree installed. The wells are ready for production pending pulling of deep-set plugs, perforation and clean-up. The wells are temporarily abandoned with seawater treated with corrosion inhibitor for protection of the wells.

The design of the 3 production wells can be seen on the figure below.

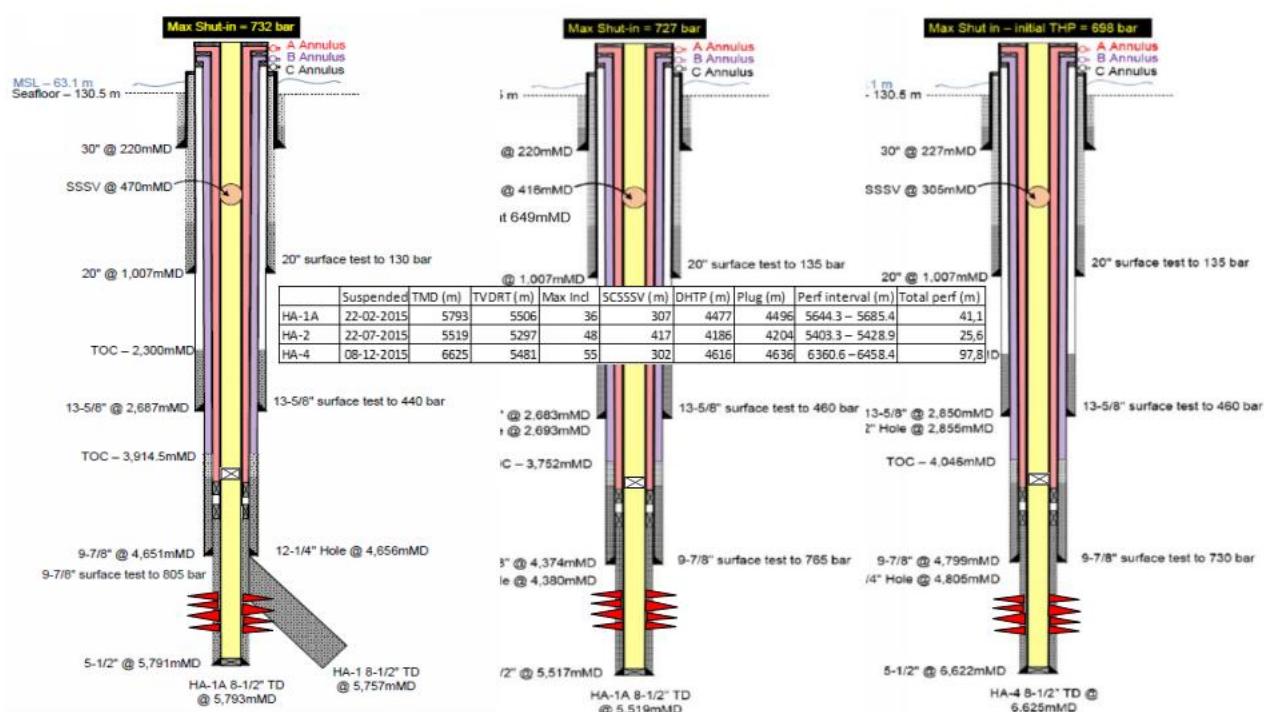


Figure 5-4 Illustration of the design of the 3 HPHT production wells (from left: HA-1A, HA-2 & HA-4).

Two wells, HA-3A and HA-5, were decided to be plugged back and suspended at the 13-5/8" casing. These wells can be side-tracked at this point for future activities.

5.3.3 South Arne host platform

The facilities at South Arne main consist of a combined wellhead, processing and accommodation platform, connected by a bridge to a wellhead platform, SA WHPE, and an unmanned satellite platform, South Arne Well Head Platform North (SA WHPN), see Figure 5-4. SA WHPE is placed about 80 m east of the existing South Arne platform and connected to the platform by a combined foot and pipe bridge while SA WHPN is an unmanned platform with a helideck about 2.5 km north of the existing South Arne main platform. A bundle pipeline has been established between SA WHPN and SA WHPE, which incorporates a production pipeline, lift gas and water-injection pipelines and power supply cables. South Arne main has accommodation facilities for 75 persons.

The processing facilities at South Arne consist of a plant that separates the hydrocarbons produced and an 87,000 m³ oil storage tank on the seabed from which the oil is exported to shore by tanker. The treated gas is exported by a pipeline to Nybro. All the produced water is processed and treated, after which as much as possible is reinjected and the rest is discharged to sea.

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Figure 5-5 South Arne and well head platform East.

The amounts of oil, gas and water produced at South Arne in 2020 are listed in Table 5-2.

Table 5-2 Key activity figures from South Arne 2020 (South Arne OSPAR report 2021).

| Activity | Unit | Value |
|-------------------------------|--------------------------|-------|
| Oil production | thousand Sm ³ | 479 |
| Gas production* | million Sm ³ | 82 |
| Produced water, discharged | thousand Sm ³ | 290 |
| Displacement water discharged | thousand Sm ³ | 481 |
| Injected water | thousand Sm ³ | 2,218 |

* Including for flaring and used locally as fuel

5.4 Construction and installation

5.4.1 Hejre Legacy wells

The scope for the present EIA related to the Hejre Legacy wells covers perforation and clean-up of HA-1A, HA-2 and HA-4. These activities are described further below.

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5.4.1.1 Well perforation and clean-up of HA-1A, HA-2 and HA-4

A rig is required to re-enter the wells. The rig activities for completion of the wells will consist of:

- Rig entry seabed survey
- Move rig to location
- Rig up wireline (coiled tubing contingency option)
- Perforate and clean up wells
- Move rig away

Prior to moving in the rig, a survey of the seabed will take place using ROV with USBL. The survey will take up to 24 hours to conduct.

It is expected that a three-legged jack-up rig will be used for all well activities. The jack-up rig will be towed to and positioned alongside the Hejre platform. When the rig is in position, the rig's legs with spud cans will be lowered into the seabed to ensure that the rig will stay stabilized during drilling operations. A spud can is a flat conical shaped foot attached to the leg of the rig, which ensures that the rig will not sink too deep into the seabed.

The spud cans will typically penetrate 0.5-3 m into the seabed, depending on the underlying sediment. If necessary, the spud cans can be supported by rock dumps. Each spud can will have a size of 201 m², which is 603 m² in total. The substructure of the leg will be an open construction with 3 rig legs each having a size of around 671 m², which results in 2013 m² (0.002 km²) in total. If rock dump is required up to 6,500 MT of rocks can be required.

The drilling derrick will then be positioned over the platform so that the wells can be accessed or drilled through the selected slots on the platform.

Once the rig is in place and all interfaces established and verified, wireline equipment will be rigged up on the completed wells. Wireline will be used for pulling of the deep-set plugs and perforation of the wells. On each of the wells, a survey tool will be run on wireline to verify and correlate depth and intervals for later perforation. After accurate well correlation, the perforating assemblies will be run in hole in each well and the wells perforated at correct depth and orientation.

Table 5-3 provides an overview of the estimated amounts of completion chemicals to be used for the Hejre Legacy wells. Possible amounts for contingencies are included in the figures.

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Table 5-3 Estimated usage of completion and clean-up chemicals for the Hejre Legacy wells (based on a coiled tubing deployment, equal to worst case). All the usage figures include 100% for contingencies.

| Completion chemicals | Planned use [tons] | Planned discharge [tons] | Colour code |
|----------------------------|--------------------|--------------------------|-------------|
| Lubricant | 0.2 | 0 | R |
| Viscosifier | 1 | 0.2 | G |
| Brine | 1203 | 0.1 | G |
| Hydrate removal | 12 | 0 | G |
| MEG | 533 | 0 | G |
| Brine | 300 | 0 | G |
| Manage Clays | 900 | 0 | G |
| Well cleanup | 127 | 0 | Y |
| Viscosifier | 15 | 0 | Y |
| Corrosion Protection | 3 | 0 | Y |
| Brine | 2400 | 0 | Y |
| Lubricant | 12 | 0 | Y |
| Friction reducer | 3 | 0 | Y |
| H ₂ S scavenger | 5 | 0.5 | Y |
| Biocide | 4 | 0.2 | Y |

After the well have been perforated, the well will start to flow unassisted based on low density inhibited completion brine. The initial flow will be completion brine from the well head to the perforation depth. Following the completion brine, the perforations debris with the formation fluid (oil + associated gas) will start flowing to surface. As a minimum, a 12-hour flow period is expected after the appearance of formation fluids at surface. Following the clean-up, the well will be closed-in for 2 hrs, then opened-up for a 24 hour well test until acceptable production fluid values are reached.

Clean-up and well test will take place via rig-based test equipment until acceptable production fluid values are reached. Well fluids will be produced to a test oil separator on the rig. Debris will be shipped to shore, produced oil and gas will be burned via a rig-based burner. Minor droplets of oil can reach the sea which can create a sheen at surface (expected order of magnitude: ~1 litre per well). When the perforation, clean-up and well test has been completed the wells are handed over to the Production Operations Department.

The clean-up and well test is expected to produce approx. 1,000 Sm³ oil per well and up to 322,300 Sm³ gas per well.

5.4.1.2 Remedial cement plug in HA-5

The temporarily abandoned well HA-5 has an issue with the downhole cement plug set inside the 13-5/8" casing to create a barrier against any potential shallow permeable layers.

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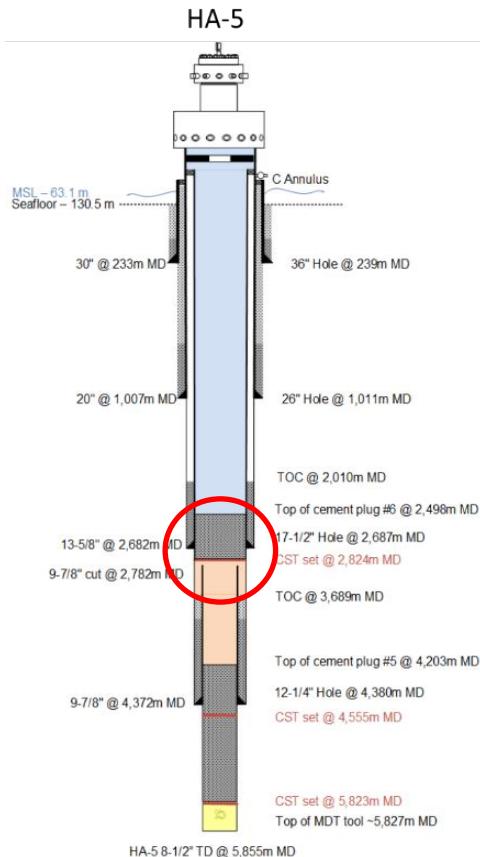


Figure 5-6 HA-5 cement plug.

The pressure between the plug and the surface barrier is slowly building up, and it will be required to enter the HA-5 well to remedial the cement plug. The remedial work will include the following activities:

- Skid to HA-5
- Remove the temporary abandonment (TA) cap, rig up the blow-out preventer (BOPs) and riser on HA-5
- Enter the well and drill out/dress-off part of the established cement plug
- Set a new cement plug on top and load- and pressure test same
- Rig down, re-install TA cap and skid away from HA-5.
- The existing plug will only be partly drilled out, to keep the bottom part of the plug as mechanical foundation to enable setting the new cement plug above.

For the remedial of the cement plug in HA-5 drilling mud, cement and completion fluid will be used for drilling out the cement plug, setting a new cement plug and displacing the well to inhibited fluid whereafter the well will be left as temporarily suspended. OBM will be used to drill out the cement plug. All OBM will be contained and shipped to shore for re-use or disposal. The cementing pieces will be circulated out of the well with the OBM during the plug-drilling operations and also will thus also be shipped to shore for disposal. The inhibited fluid in the wells will be led to the rig's slop unit and further on to South Arne for processing and reinjection with produced water. New inhibited water will be left in the HA-5 well. Thus, no discharges will take place.

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Table 5-4, Table 5-5 and Table 5-6 provides overview of chemicals used for drilling out the plug, cementing and inhibited fluid for preservation, during installation of remedial cement plug in HA-5.

Table 5-4 Estimated use of chemicals for drilling out the plug of HA-5. All the usage figures include 100% for contingencies.

| Drilling out plug | Planned use [tons] | Planned discharge [tons] | Colour code |
|-------------------|--------------------|--------------------------|-------------|
| Base Oil | 258 | 0 | Y |
| Viscosifier | 11 | 0 | Y |
| Alkalinity | 16 | 0 | G |
| Emulsifier | 13 | 0 | Y |
| Brine | 70 | 0 | G |
| Fresh water | 103 | 0 | G |
| Filter loss | 8 | 0 | R |
| Weight material | 1,018 | 0 | G |

Table 5-5 Estimated use of chemicals for cementing new plug in HA-5. All the usage figures include 100% for contingencies.

| Cementing | Planned use [tons] | Planned discharge [tons] | Colour code |
|--------------------|--------------------|--------------------------|-------------|
| Anti-sedimentation | 4 | 0 | G |
| Dispersant | 2 | 0 | G |
| Viscosifier | 0.2 | 0 | G |
| Dispersant | 0 | 0 | Y |
| Anti-Foam | 0.2 | 0 | Y |
| Fluid Loss Control | 0.5 | 0 | Y |
| Solvent | 0.5 | 0 | Y |
| Surfactant | 0.6 | 0 | Y |
| Cement | 41 | 0 | G |
| Weighting Agent | 21 | 0 | G |

Table 5-6 Estimated use of inhibition chemicals for preservation of HA-5. All the usage figures include 100% for contingencies.

| Preservation | Planned use [tons] | Planned discharge [tons] | Colour code |
|------------------------|--------------------|--------------------------|-------------|
| Drill water/freshwater | 460 | 0 | Y |
| Biocide | 0.7 | 0 | Y |
| pH control | 1.4 | 0 | G |
| Alkalinity control | 2.3 | 0 | G |
| Oxygen scavenger | 0.7 | 0 | Y |

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5.4.1.3 Rig utility chemicals

A limited number of chemicals will be used on the rig.

The rig wash will be discharged with the washing water. It is assumed that the amount of water is 10 m³ and will be discharged within 1 hour. The use and discharge of rig wash is estimated to 0.3 tons rig wash per event and there will be approx. 25 events per well. In total that is 30 tons rig wash for the four wells.

The jacking grease is used when the rig is jacking up and down and thus only in the beginning and finalization of the rig activities. It is assumed that the jacking grease will be discharged over 10 days with a flow rate of 20 kg/day.

The hydraulic fluid is assumed to be discharged over 10 days with a flow rate of 10 kg/day.

Table 5-7 Estimated use of utility chemicals. All the usage figures include 100% for contingencies.

| Utility chemicals | Planned use [tons] | Planned discharge [tons] | Colour code |
|------------------------------|--------------------|--------------------------|-------------|
| Rig wash | 30 | 30 | Y |
| Jacking grease / skid grease | 0.2 | 0.2 | Y |
| Pipe dope / tubing dope | 3.2 | 0.3 | Y |
| BOP control fluid | 116 | 0 | Y |
| Hydraulic fluid | 1.6 | 0.1 | Y |
| Wireline fluid | 20 | 10 | Y |

5.4.1.4 Summary of use and discharge of chemicals

In summary, the expected usage of chemicals in the different stages of the perforation, clean-up and remedial of cement plug of the Hejre Legacy wells are listed in Table 5-8, segregated into the main hazard categories (DEPA colour classification red, yellow and green).

Table 5-8 Overview of expected usage (in tons) of chemicals per classification.

| Activity | Red chemicals | | Yellow chemicals | | Green chemicals | |
|------------------------|---------------|------------------|------------------|------------------|-----------------|------------------|
| | Use (tons) | Discharge (tons) | Use (tons) | Discharge (tons) | Use (tons) | Discharge (tons) |
| Perforation & clean-up | 0.2 | 0 | 2569 | 0.7 | 2949 | 0.1 |
| Drilling out plug | 8 | 0 | 282 | 0 | 1,207 | 6 |
| Cementing | 0 | 0 | 2 | 0 | 68 | 0 |
| Preservation | 0 | 0 | 462 | 0 | 4 | 0 |
| Utility | 0 | 0 | 171 | 40.6 | 0 | 0 |

5.4.1.5 Emissions to air

Emissions to air in relation to rig and well activities are related to:

- Rig activities (mainly running power generator)

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- Crew transport activities by helicopter and standby boat
- Transport of rig (rig move)
- Flaring during well clean-up and well test
- Supply vessels (transport of goods).

Table 5-9 Type of transport related to completion activities for 3 production wells.

| Vessel type | Number of vessels | Days | Fuel consumption [m3/day] |
|---|--------------------------|------|----------------------------|
| Rig operation during completion and clean-up | | | |
| Rig | 1 | 100 | 10 |
| Supply vessel | 1 | 13 | 10 |
| Standby boat | 1 | 100 | 3 |
| Tugs | 1 (main) + 2 (assisting) | 20 | 20 (main) + 10 (assisting) |
| Helicopters (kerosene) | 1 | 13 | 1.2 |

The assumptions are:

- All estimated days include weather delays and unforeseen events.
- The rig is operating 100 days in total for all three wells.
- The supply vessels operating 11 hours/day, 2 times a week in 100 days equivalent to approx. 13 full days in total.
- The standby boat is available 24 hours/day while rig is operating.
- The helicopters are operating 3 hours/day in 100 days equivalent to 13 full days.
- The clean-up and well test is expected to produce approx. 2-4 well volumes. The total gas volume expected to be flared from the three wells is up to 967,000 Sm³.

5.4.2 Platforms

5.4.2.1 Modification of the existing Hejre jacket

Before installation of the new Hejre topsides, some modifications of the existing jacket are conducted. The following activities are to take place:

- Removal of temporary items on the jacket left over from the original installation in 2014, and other temporary equipment such as solar panels.
- Completion of the Pre-Drilling Wellhead Module (PDWM) and removal of some caissons
- Installation of new fortified riser. The existing Hejre risers will remain in place as they could be utilised in the future. I.e., they can only not be used for the Hejre tie-back to South Arne concept due to the export pressure and temperature, which is different from the Hejre Legacy concept.

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The activities will be conducted by a Heavy Lift Vessel (HLV) and a flotel or similar will be at Hejre for accommodation.

5.4.2.2 Installation of new Hejre topsides

The new Hejre topsides module main frame on Figure 5-7 is designed to fit onto the existing Hejre jacket. The module follows the existing jacket leg spacing with 20 meters in both directions. The deck height follows the existing wellhead module.

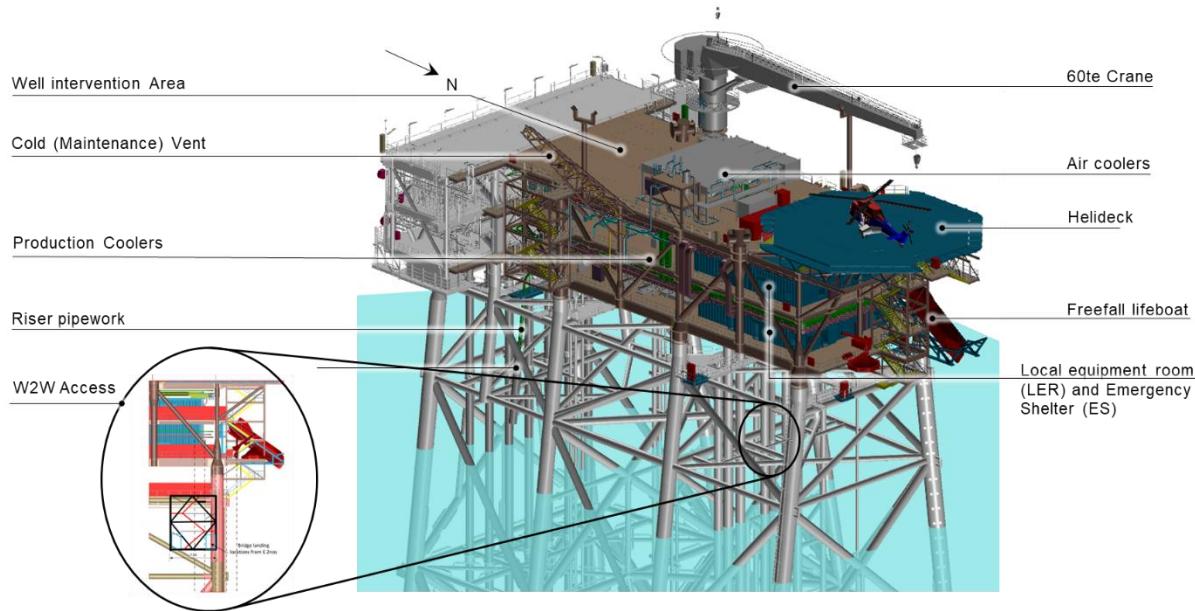


Figure 5-7 The Hejre new unmanned topside located on existing jacket structure. Grey is existing structure.

The new unmanned topside structure includes:

- Permanent helideck
- Pig launcher
- Electrohydraulic crane
- Air-cooled exchange, well stream cooler (no processing)
- Shelter
- Over pressure protection fully rated to well shut-in pressure
- Necessary utilities incl. local chemical supply

The topsides will have an estimated weight of 3,200 ton in (dry weight).

The main principle of installation of the topside is that the module will be lifted in a single lift using a HLV. A flotel or similar will be at Hejre for accommodation.

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5.4.2.3 Modifications at South Arne WHPE and Main

The Hejre tie-back to South Arne concept will export the multiphase to South Arne.

The Hejre multiphase is intended to be produced through a new riser at South Arne WHPE. To tie-in the multiphase fluid from Hejre, the following new equipment are expected to be installed:

- Riser caisson at South Arne WHPE housing multiphase riser and power cable
- New tie-in module with slug catcher (metering on outlets), heater, pig receiver at South Arne WHPE
- NGL injection and booster pumps at South Arne Main platform

The riser caisson will be lifted by a construction vessel and the tie-in module will be installed by a HLV.

5.3.5.1 Emissions during installation

Emissions to air in relation to pre-installation activities, installation of the new Hejre topsides and the modifications at the South Arne WHPE and Main platform are related to: Transport activities and operations by the Heavy Lift Vessel (HLV), the flotel and special vessels used for installation of the risers at Hejre, the Hejre topside, the caisson with riser at South Arne and the tie-in module at South Arne.

The vessels listed in Table 5-10 are included in the fleet. The days include contingency for weather delays and unforeseen events.

Table 5-10 Type of transport related to topsides installation activities (INEOS).

| Vessel type | Number of vessels | Days | Fuel consumption [m ³ /day] |
|--|-------------------|------|--|
| Heavy lift vessel (HMC Balder or similar) | 1 | 9 | 40 (mT/day) |
| Barge | 1 | 35 | None |
| Tugboats | 2 | 35 | 20 |
| Flotel for HUC (Seafox Marinia or similar) | 1 | 125 | 3 (mT/day) |
| Heavy lift vessel (Seven Artic or similar) | 1 | 18 | 30 (mT/day) |

5.4.3 Pipeline and power cable

The pipeline system connecting the Hejre platform to the host platform South Arne WHPE will consist of one pipeline and one power cable: A new 33 km 10" or 12" multiphase pipeline, either wet insulated or pipe-in-pipe, from Hejre tie-back to South Arne WHPE and a new 33 km power cable with electrical power cables and fibre optic cables from Hejre tie-back to South Arne WHPE. The pipeline (and cable) will for the main part of the route be placed within the safety zone of the existing 12" pipeline from Hejre to the Gorm platform, only 6 km will be outside existing safety zone. The two pipelines will be parallel to each other and there will be no crossings. The pipeline route is presented in Figure 5-8.

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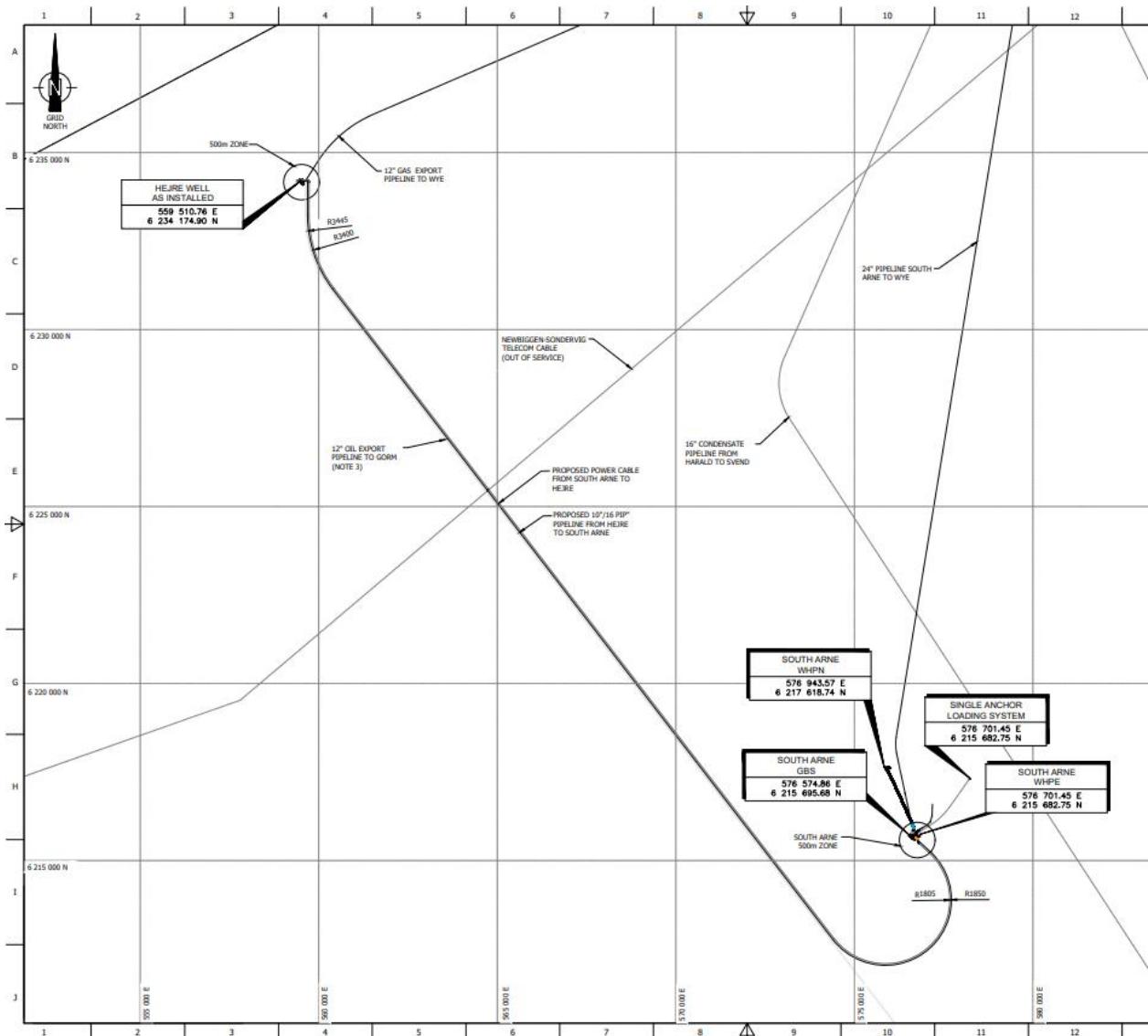


Figure 5-8 Pipeline and power cable route from Hejre tie-back to South Arne

The process of installation, burial and commissioning of pipelines and pipelines spools include the following activities:

- Pre-installation survey
- Laying of the pipelines on the seabed
- Flooding with inhibited seawater
- Trenching and back-filling
- Post-installation survey
- Tie-in spools
- Cleaning and gauging
- Hydrostatic testing

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- Dewatering if required
- Commissioning

The pipeline alignment will initially be checked for presence of foreign objects that could interfere with the pipeline installation.

A survey will be performed of the seabed before installation of the pipelines. The pipelines will be laid out on the seabed using a dynamically positioned S-lay or Reel vessel and will be flooded with inhibited seawater soon after laying to ensure the stability of the pipelines.

The pipelines will be trenched and buried in the seabed to protect from fishing trawling gear and other underwater equipment. Two trenching methods are considered, ploughing and water jetting, where the ploughing is considered the most cost-effective and a good solution for the area. The ploughing is generally giving an even vertical profile of the pipeline, which will eventually limit post-installation mitigation actions like rock dumping. In applying the ploughing method, a 1.5-2.5 m deep trench is constructed at a rate of 200-400 m per hour. Backfilling the pipeline trench is done at a similar rate. Applying the water jetting method, a 0.5 m wide and minimum 1.5 m deep trench is constructed at a rate of 200-1,000 m per hour. Use of this method is limited to sand and soft clay.

After the pipeline have been installed, trenched and backfilled a post installation survey will be performed of the buried pipeline to ensure it is sufficient buried and protected.

The pipeline and power cable will be trenched in parallel trenches with 50-meter distance between the trenches, see Figure 5-9 below for the pipelines approach at Hejre. After exiting the trench, the untrenched part of the pipelines will be protected by rock dump and concrete mattresses. A total of 41,000 MT of rocks will be used and 175 concrete mattresses with 6 meters x 3 meters dimensions and 0.3 meters thickness.

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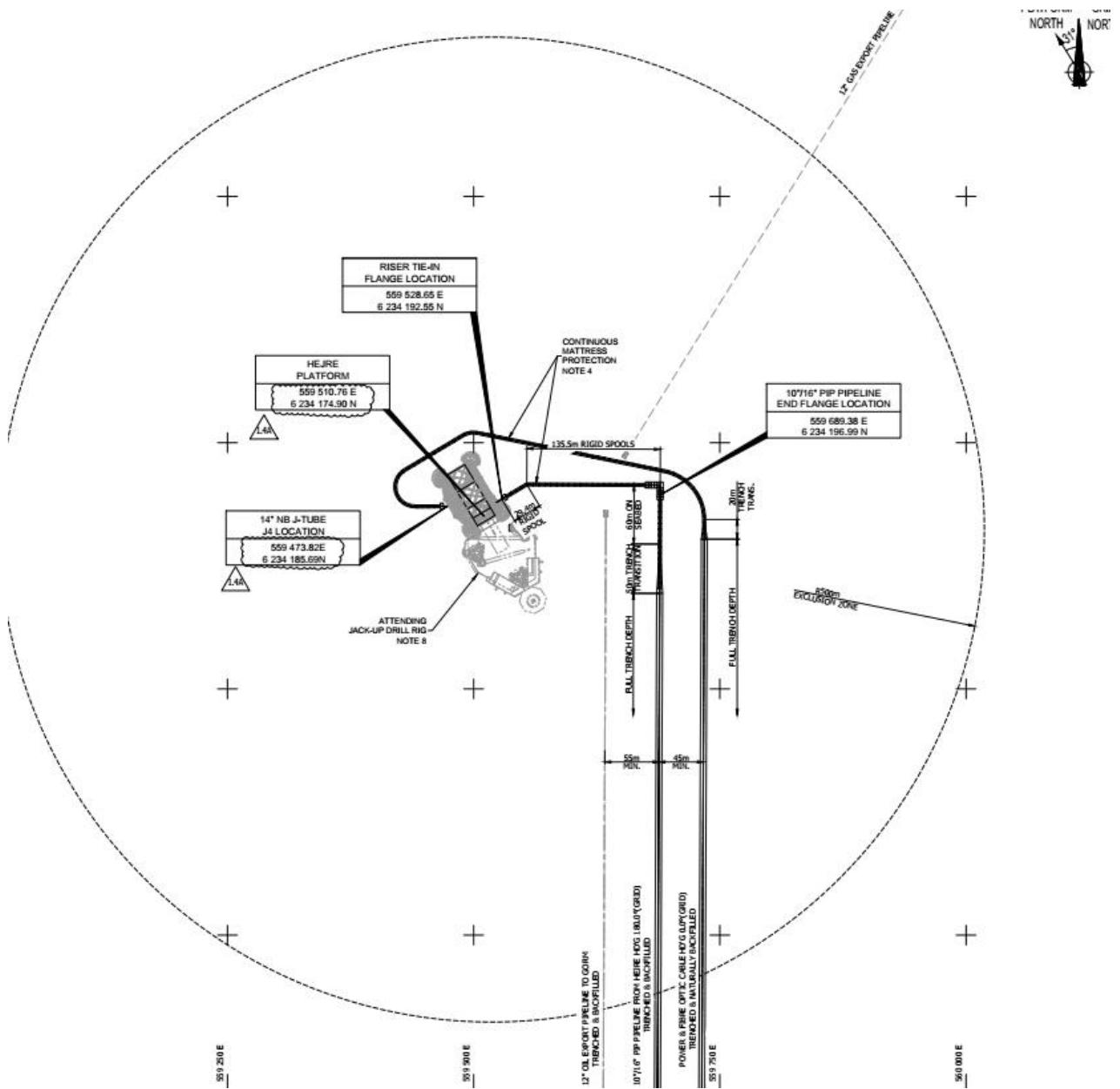


Figure 5-9 Pipeline and power cable approach to Hejre, showing the end of each trench. The untrenched part will be protected by rock dump.

When the pipelines have been trenched and backfilled, the system is tied-in at the Hejre and South Arne WHPe platforms using bespoke spools, and a simultaneous cleaning and gauging process is performed by designated pigs at a speed of roughly 0.5 m per second.

Pipelines are hydrostatically tested before commissioning to make sure the pipelines do not leak. For 24 hours, the flooded pipelines are exposed to a test pressure, usually 15% greater than the design pressure, and is monitored for any pressure drops that would indicate a leak. Mechanical coupling locations, such as valves, flanges and spools have the highest probability of leaking, so these will be monitored during the hydrostatic test. The leak testing is facilitated by adding a fluorescent chemical, so even small leaks can be easily identified.

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Table 5-11 below gives an overview of the estimated amounts planned to be used during the pipeline tests. The amount is based on a dosage rate of 450 ppm of a mixed cocktail for pressure testing, containing oxygen scavenger, corrosion inhibitor and biocide. The dosage rate of the fluorescent is estimated to be less than 10% of the pressure test cocktail.

Table 5-11 Estimated use of chemicals during pipeline tests

| Pipeline testing | Planned use [tons] | Planned discharge [tons] | Colour code |
|---|--------------------|--------------------------|-------------|
| Combined pressure test cocktail (corrosion inhibitor, biocide and oxygen scavenger) | 0.7 | 0.7 | Y |
| Fluorescent tracer chemical | 0.07 | 0.07 | Y |

The final step before commissioning is dewatering of the pipelines. If required, the multiphase pipeline will be dewatered in the direction from Hejre to the host using a pig that is forced through the pipeline.

5.4.3.1 Emissions during pipelay and power cable

Emissions to air in relation to pipelay are related to transport activities and operations by the fleet (pipelay vessel and special vessels) used for pipelay.

The operations by the fleet both include transportation activities and operations such as pipelay, rock dumping, trenching etc. The vessels listed in Table 5-12 are included in the fleet. The days include contingency for weather delays and unforeseen events.

Table 5-12 Type of transport related to pipelay activities (INEOS).

| Vessel | Number of vessels | Days | Fuel consumption [m ³ /day] |
|---|-------------------|------|--|
| Pipelay | | | |
| Pipelay vessel (Seven Navica or similar) | 1 | 30 | 20 |
| Survey vessel (ROV) (Seven Petrel or similar) | 1 | 35 | 5 |
| Trenching vessel (Skandi Skansen or similar) | 1 | 20 | 20 |
| DSV (Seven Atlantic or similar) | 1 | 45 | 20 |
| Guard vessel | 1 | 30 | 0.5 |

5.5 Production phase

5.5.1 Production activities during operation of Hejre

In the following a description of production activities at the Hejre unmanned platform is presented.

The current project re-development plan with South Arne as host platform anticipates first oil exported from the Hejre field in 2028 with production rates as listed in Table 5-13. No produced water is expected from Hejre in the P50 scenario. The prognosis for amount of produced water is although estimated with high uncertainty.

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Table 5-13 Overview of anticipated production rates from the Hejre wells.

| Production | Hejre design flow rates (P50) |
|-------------------------------|--|
| Oil | 4,000 Sm ³ /d (25,000 bbl/d) |
| Gas | 1,220,000 Sm ³ /d (43 MMSCFD) |
| Produced water | 0 Sm ³ /d (0 bbl/d) |
| Total produced liquid* | 4,000 Sm³/d (25,000 bbl/d) |

*The total combined fluids exported from Hejre is capped by the capacity offered at the host, South Arne (25,000 bbl/d).

The production profile Hejre is shown in Figure 5-10.

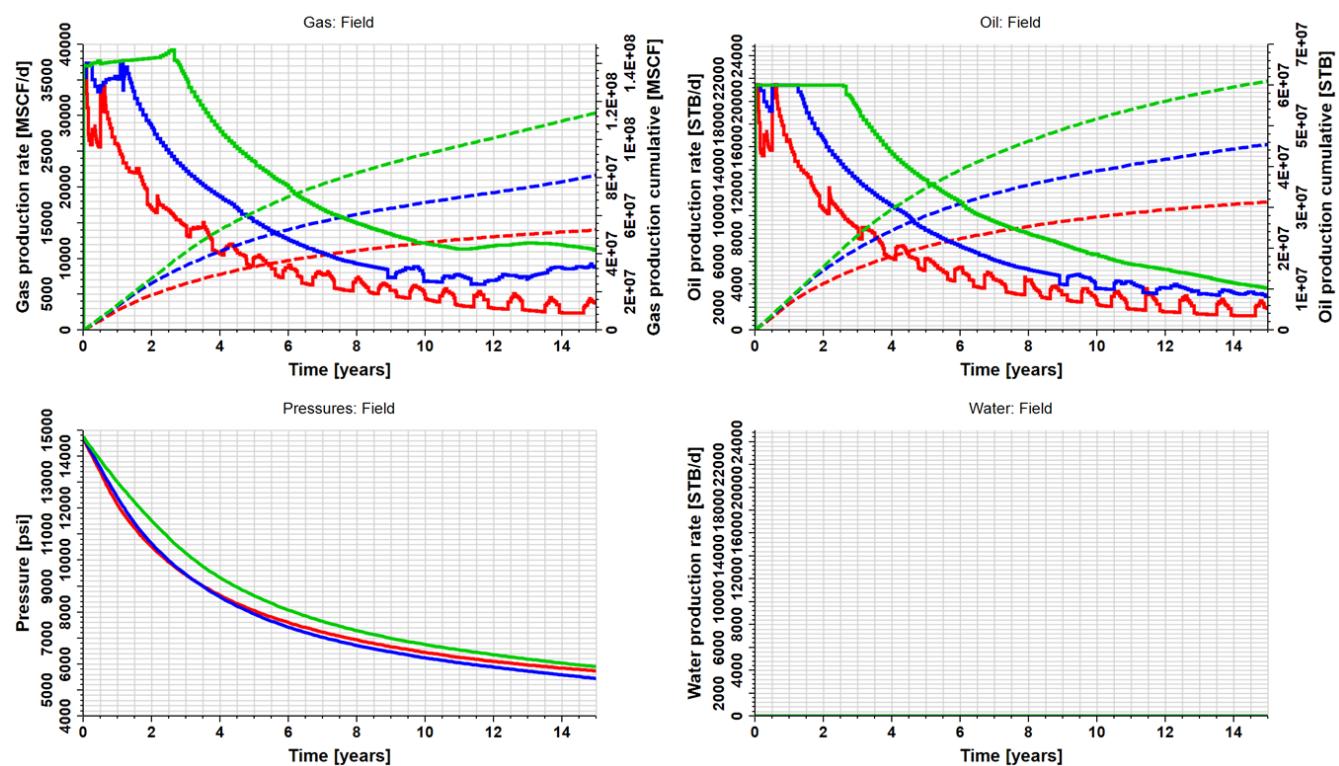


Figure 5-10 Expected production profile of production from Hejre. Lines are P10, P50, P90.

The Hejre wells will not produce at their maximum at the same time, as production is limited by the capacity offered at the host, South Arne (25,000 bbl/day).

5.5.2 Discharge of produced water

In the P(50) case no produced water is expected. Though conservative estimate based on no restrictions in the production capacity at South Arne assumes a maximum daily flow of produced water from Hejre to be up to 2,000 BPD.

During the processing on the South Arne platform, any produced water will be separated from the oil and gas and cleaned before it is discharged to sea, if the produced water exceeds the injection capacity at South Arne. This situation occurs in the event of a pump brake down. The oil-in-water discharge limit specified in the in the South Arne discharge permit (20 mg/l in 2025/2026) is anticipated to remain in compliance following the Hejre tie-in to South Arne. It is expected that the amount of produced water at South Arne to

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be discharged will not exceed the limits set in the existing South Arne EIA (Hess, 2006) due to tie-in of Hejre. Approximately 80% of the produced water at South Arne is reinjected.

5.5.2.1 Production chemicals at Hejre

The chemicals already in use at South Arne are assumed to be suitable for the Hejre production fluids as well. The chemicals used at Hejre will be:

- Process corrosion inhibitor for continuous injection to multiphase export line
- Corrosion inhibitor for preventing corrosion in closed loop cooling system
- Wax inhibitor for continuous injection to multiphase export line
- Scale inhibitor to continuous injection to upstream choke
- Hydraulic fluid to motive fluid for actuation of valves
- Cooling medium for use in closed loop cooling system.

Some of the above chemicals are exported to South Arne with the well fluids. Yearly consumptions (at Hejre) and discharges (from South Arne) are listed in Table 5-14.

The chemicals used at South Arne for treatment of the Hejre production will be:

- Additional H₂S scavenger for removal of H₂S from export gas to delivery specification.
- Additional demulsifier for continuous injection to improve separation of oil and water in the separator.
- Additional antifoam for continuous injection to improve the separation of oil and water.

The three chemicals are already used on South Arne for treatment of fluids from existing wells. The chemical consumption at South Arne and discharges from the Hejre contribution is added to the planned South Arne chemicals and detailed in Table 5-15.

The use of chemicals will be evaluated on an ongoing basis to optimise the production process and reduce chemical consumption. The chemicals will be supplied via tote tanks at Hejre or injected locally at South Arne.

As mentioned, there will be no discharge point at Hejre. All water-soluble chemicals will be partly discharged at South Arne with produced water. The remainder of the chemicals will be exported to shore with the export oil or reinjected into the reservoirs with produced water.

Table 5-14 provides the overview of chemicals to be used on Hejre during production. The amounts are based on the maximum oil production of 35,000 BOPD, which is a conservative estimate based on no restrictions in the processing capacity at South Arne.

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Table 5-14 Estimated use of chemicals at Hejre during production. Water soluble chemicals will be discharged with the produced water discharge at the South Arne installation.

| Hejre production chemicals | Planned use at Hejre [tons/year] | Planned discharge at South Arne [tons/year] | Colour code |
|---------------------------------|----------------------------------|---|-------------|
| Corrosion inhibitor | 12 | 0 | Y |
| Process corrosion inhibitor | 35 | 0.35 | Y |
| Scale inhibitor | 3 | 3 | Y |
| Wax inhibitor | 610 | 6.1 | R |
| Cooling medium (close loop) | 246 | 0 | Y |
| Hydraulic fluid (closed system) | 1 | 0 | Y |

5.5.2.2 Production chemicals at South Arne after Hejre tie-in is established

The use and discharge of production chemicals on South Arne after Hejre tie-in is based on production from the South Arne wells and the additional chemicals from Hejre. The details are displayed in Table 5-15.

After tie-in of Hejre, South Arne will receive oil and gas from Hejre for processing. Chemicals exported with oil and gas from Hejre will be corrosion inhibitor, scale inhibitor, wax inhibitor, demulsifier and antifoam. The estimated use and discharge of chemicals at South Arne after tie-in of Hejre is shown in Table 5-15.

Table 5-15 Estimated annual use of chemicals at South Arne and Hejre after the Hejre tie-in. Discharges of chemicals including those used on Hejre are listed. Total use and discharges are compared with numbers from the 2006 South Arne EIA.

| South Arne production chemicals | Total planned use (South Arne and Hejre) use after Hejre tie-in [ton/year] | Planned discharge at South Arne after Hejre tie-in [ton/year] | Colour code |
|---------------------------------|--|---|-------------|
| Antifoam (Deaerator) | 2 | 2 | Y |
| Biocide (process + deaerator) | 18 | 4.4 | Y |
| Corrosion inhibitor | 60 | 12 | Y |
| Demulsifier | 43 | 3.5 | Y |
| Emulsion Viscosity Reducer | 46 | 3.5 | Y |
| H ₂ S scavenger | 260 | 52 | Y |
| Sodium Hypochlorite | 110 | 110 | R |
| TEG | 8 | 2 | Y |
| Antifoam (Process) | 39 | 0.8 | Y |
| Oxygen Scavenger | 27 | 27 | G |
| Scale inhibitor (down hole) | 42 | 6.3 | Y |
| Scale inhibitor (topside) | 55 | 13.9 | Y |
| Hydrate Disolver | 40 | 0,1 | G |
| Wax inhibitor* | 610 | 6.1 | R |
| Total after Hejre tie-in | 1360 | 243.6 | |
| Red | 720 | 116.1 | R |
| Yellow | 573 | 100.4 | Y |
| Green | 67 | 27.1 | G |

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| | | | |
|--------------------------------------|------------|------------|--|
| Total South Arne (Hess, 2006) | 647 | 336 | |
| Red | 82 | 82 | |
| Yellow | 495 | 188 | |
| Green | 70 | 66 | |

As can be seen in the table above the amounts of expected used chemicals will increase compared to the South Arne EIA (Hess, 2006), which is mainly due to the expected use of wax inhibitor for Hejre production. The wax inhibitor is lipophile and will mainly be absorbed in the oil phase. Only 1% of the wax inhibitor enters the produced water phase. Also, it should be highlighted that sodium hypochlorite has changed pre-screening color from green to red after the 2006 EIA was published and that sodium hypochlorite is not used as a result of Hejre production. Compared to the 2006 EIA the total discharge will decrease because of today's higher reinjection rate of produced water resulting in less discharge volumes.

5.5.3 Emission sources

5.5.3.1 Emissions from Hejre

The Hejre platform is envisaged to be developed as a normally unmanned installation, controlled from Syd Arne. Similar to other tie-back satellite facilities operated by INEOS (such as Cecilie, Nini, Nini East), the over pressure protection philosophy is based on an inherently safe design with hydrocarbon containing process piping designed to withstand shut-in pressure. This approach eliminates the need for a flare system. Thus, no emissions will occur at Hejre apart from emissions related to transport by ship and helicopter in relations to facility maintenance.

Limited venting will take place, e.g., for routine maintenance of certain equipment and material for safety reasons prior to accessing the equipment.

5.5.3.2 Emissions from South Arne

The multiphase is transported to the South Arne Wellhead Platform East and further to the South Arne Main platform, where the processing of the oil gas and water takes place. In relation to the production, emissions to air will be generated from combustion of fuel gas, flare gas and diesel.

The tie-in of Hejre will be within the existing production capacity on South Arne. It is assumed that the emissions for combustion of fuel gas and diesel are proportional to the Hejre production volume and are within the existing environmental permits for South Arne. A temporary higher amount of flaring may be expected during tie-in of the Hejre wells compared to normal production flaring.

The emissions from South Arne are reported on a yearly basis in reports to OSPAR and the emissions from 2021 are used as the best forecast for the general level of yearly emissions at South Arne from power production and as well as for the emissions related to flaring after tie-in of Hejre see *Table 5-16*.

Table 5-16 Emissions to air from South Arne, 2021.

| Activity | CO ₂ [10 ³ ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] | CO ₂ -eq [10 ³ ton] |
|-----------|---------------------------------------|-----------------------|-----------------------|-----------------------|-------------|---|
| Operation | 180.2 | 219 | 3 | 111 | 333 | 180.3 |

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5.5.4 Platforms

The Hejre platform is an unmanned platform and thus the crew will be transported via helicopter from South Arne.

Design of the Hejre topside is focused on high reliability, easy maintainability and good access without requirements for scaffolding or other temporary systems.

Transportation and logistics will be managed with the existing South Arne set-up, and activities will be coordinated and optimized.

5.5.4.1 Facility chemicals at Hejre and South Arne

In relation to cleaning and washing of the installations certain facility chemicals are used and discharged to sea as shown in Table 5-17. The use of facility chemicals at South Arne is additional to what is already in use on the platform today.

The chemicals will be discharged over a short period of time approx. a few hours per job and thus no continuous discharge of facility chemicals will occur during operation.

Table 5-17 Estimated annual use and discharge of facility chemicals at Hejre and South Arne

| Facility chemicals | Planned use at Hejre [tons/year] | Planned discharge at Hejre [tons/year] | Planned use at South Arne [tons/year] | Planned discharge at South Arne [tons/year] | Colour code |
|--------------------|----------------------------------|--|---------------------------------------|---|-------------|
| Rig wash | 3 | 3 | 0 | 0 | Y |
| Wax remover | 0 | 0 | 8 | 8 | Y |

5.5.4.2 Well service chemicals at Hejre

Also, well service chemicals will be used whenever needed at Hejre throughout the design life. The well service chemicals include chemicals for well head maintenance, coil tubing acid jobs, wireline jobs and coil tubing. The use and discharge of well service chemicals at Hejre can be seen in Table 5-18.

Well head maintenance chemicals are not expected to be discharged as the hydraulic fluid is used in a closed system and the remaining chemicals are for cleaning, flushing and topping up the system. Maintenance can require a small amount to be drained off. The fluid is collected and safely disposed of as per the waste management system. The well head system will subsequently be topped up with new hydraulics fluid.

Coiled tubing and coiled tubing acid jobs are expected to be carried out 4 times over the 19-year period from 2028-2047. Coiled tubing acid chemicals are not expected to be discharged at Hejre, as they are used in a closed production system and either captured and sent onshore or sent to South Arne as part of the production.

Wireline jobs are expected to be carried out approx. 60 times on Hejre over a maximum of 19 years. Wireline chemicals are also not expected to be discharged at Hejre, as they are used in a closed production system and either captured and sent onshore or sent to South Arne as part of the production.

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Table 5-18 Estimated use at Hejre and discharge at South Arne of well service chemicals over a maximum of 19 years.

| Well service chemicals | Planned use Hejre [tons/year] | Planned discharge at South Arne [tons/year] | Colour code |
|---------------------------------|-------------------------------|---|-------------|
| Well head maintenance | | | |
| Wellhead hydraulic fluid | 0.08 | 0 | Y |
| Hydrate inhibitor | 38 | 0 | G |
| Base oil | 4 | 0 | Y |
| Grease | 0.8 | 0 | Y |
| Coiled tubing acid jobs* | | | |
| Acid | 56 | 56 | G |
| Frac additive | 0.2 | 0.2 | Y |
| Corrosion inhibitor | 1.4 | 1.4 | Y |
| Corrosion inhibitor | 1.4 | 1.4 | G |
| Inhibitor aid | 0.4 | 0.4 | G |
| Iron stabilizer | 0.2 | 0.2 | Y |
| Wireline jobs** | | | |
| Hydrate inhibitor | 166 | 166 | G |
| Brine lubricant | 22 | 22 | Y |
| Coiled tubing | | | |
| Hydrate inhibitor | 4 | 4 | G |
| Lubricant | 10 | 10 | Y |

* The tonnes given are the total amount planned used for 4 coiled tubing job divided by number of years Hejre is in operation.

** The tonnes given are the total amount planned used for 60 wireline jobs divided by number of years Hejre is in operation.

5.5.5 Pipelines

Multiphase pipelines, risers and pig traps will be designed for pigging by cleaning pigs and intelligent pigs. The multiphase system will be pigitable from the Hejre platform to the South Arne platform.

5.5.6 Wells

The Hejre HPHT wells will require regular interventions over field life. It will be possible to carry out most of the well service and maintenance activities from the Hejre WHP. More complex intervention jobs may, however, need the mobilising of a rig for equipment and crew. It is expected that a rig will be present at the Hejre platform 3 months during the lifetime of the field for maintenance of wells.

5.5.7 NORM

It is a general experience and well-known fact that offshore oil production in the North Sea is associated with contamination of certain parts of the processing equipment by small amounts of natural radioactive constituents in the reservoir, which are transported to the surface along with the extracted oil and/or particles. This material with low-level radioactivity is known as NORM (Naturally Occurring Radioactive Material).

NORM usually occurs in water injection systems where produced water is mixed with sea water but can also occur in separators, pipelines and in the production liners of the wells. In 2004, 16 tons of NORM was removed from separators and other process equipment on South Arne. The NORM deposits were reinjected into a dedicated reinjection well together with OBM-cuttings. Since start of production at South Arne in 1999, ~6 tons of NORM have been placed in temporary storage onshore.

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NORM will most likely also be present at the Hejre field and will have to be handled and disposed of in accordance with the regulations for NORM administered by the Danish Health Authority, Radiation Protection. NORM contaminated equipment will be cleaned onshore and NORM material will be stored in a temporary storage approved by the authorities.

It is not possible to make an exact estimate of how much NORM will be produced at Hejre, but it is expected to be in the same range as the amount produced from South Arne in the period from 1999 to now.

5.6 Decommissioning phase

The expected lifetime of the installation is a maximum of 19 years. The decommissioning of the platform, wells and pipelines will be conducted in accordance with Danish legislation and international agreements in force at the end of the installation lifetime.

5.6.1 Decommissioning activities

The following is a general description of how an installation like Hejre may be decommissioned. The process will be the same as for the original Hejre project:

- Production strings are pulled out of the well and transported to shore for reuse or recycling.
- The reservoir will be secured by plugging and sealing the wells with concrete fillings in predetermined depths of the wells. The concrete fillings prevent the gasses and fluids from escaping from the wells into the marine environment or into other layers in the underground.
- The entire platform and subsea structures will be flushed for all hydrocarbons, dismantled, removed and transported to shore for recycling or reuse.
- Finally, pipelines are emptied of remaining hydrocarbons, which are transported to shore, and subsequently flooded with seawater. The pipelines remain buried in the sediment for in situ disposal if permitted by Authorities. If *in situ* is not permitted the pipeline and power cable will be prepared for removal by the following methodology.

Pipeline path will be dredged and Reverse Reeling, Reverse S lay or Cut and Lift method will be applied. For Reverse Reeling and S lay a Pipelay Vessel will be used. In case the Cut and Lift method is used an Offshore Construction Vessel could be used. A Comparative Assessment will be performed to determine the best solution.

Removal of the power cable will be a reverse reeling back to an Offshore Construction Vessel and stored on carousels onboard the vessel.

Pipeline and power cable will be disposed onshore.

5.6.2 P&A of wells

When decommissioning the Hejre platform all wells will need to be plugged and abandoned (P&A) before removing the platform etc. The P&A activities are foreseen to be performed from a rig. During the P&A of the wells, different chemicals will be used for well activities and for the rig. The impact from chemical use is parallel to what is used for drilling activities.

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At the moment the P&A program for Hejre has not been specified in detail. It will be developed further in due time before decommissioning. Below the indicative P&A program is described:

1. Bullhead the well free for hydrocarbons
2. Install deep mechanical barrier below Production Packer
3. Displace well to kill fluid
4. Install shallow barrier
5. Remove X-mas tree
6. Nipple up HP riser and BOP's
7. Remove shallow barrier
8. Recover production tubing
9. Install 9 7/8" mechanical plug, and set +100m primary/secondary cement plug#1 above
10. Load and pressure test plug #1
11. Install 9 7/8" mechanical plug, and set +100m primary/secondary cement plug#2 above (stringers)
12. Load and pressure test plug #2
13. Set 9 7/8" mechanical plug below 13 5/8" shoe
14. Displace well above mechanical plug to 1.52 sg OBM (same as fluid in 9 7/8" vs 13 5/8" annulus)
15. Cut and pull 9 7/8" casing
16. Displace well to 1.40 sg WBM
17. Set +100m primary/secondary cement plug #3 across the 13 5/8" shoe
18. Load and pressure test plug #3
19. Set mechanical barrier inside 13 5/8" casing
20. Displace well to sea water
21. Multistring cut 13 5/8", 20" casings and 30" conductor 3m below seabed. Recover to surface
22. Set Plug #4 (Environmental plug) on top of mechanical barrier inside 13 5/8" casing

When developing the P&A program also the specific chemical products will likewise be decided and thus the following is only indicative for the P&A program.

During the P&A the wells will be displaced to WBM and OBM. A spacer and wash trains will be applied for cleaning the wells. Cement will be used for plugging and slop chemicals are sent to the slop pits on the rig and discharged. Also rig chemicals will be used. OBM will be shipped to shore. Table 5-19 provides overview of chemicals used for the P&A of the Hejre wells. One red chemical may be discharged with water from the wash trains. A yellow substitute will be used if at all possible.

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Table 5-19 Estimated use and discharge of chemicals for P&A activities of the wells.

| P&A activities | Function | Planned use Hejre [tons] | Planned discharge at Hejre [tons] | Sent to shore / left in well [tons] | Colour code |
|---|----------------------------|-----------------------------|--------------------------------------|---|-------------|
| WBM chemicals (chemicals mixed in 2,407 mT fresh water) | Brine | 56 | 44 | 13 | G |
| | pH | 1.9 | 1.5 | 0.4 | G |
| | Viscosity | 7.5 | 6.8 | 0.8 | G |
| | Weight material | 1,030 | 1,030 | 0 | G |
| OBM chemicals (chemicals mixed in 206 mT fresh water) | Weight material | 1,139 | 0 | 1,139 | G |
| | Base oil | 637 | 0 | 637 | Y |
| | Salinity | 210 | 0 | 210 | G |
| | Alkalinity | 38 | 0 | 38 | Y |
| | Emulsion | 38 | 0 | 38 | Y |
| | Viscosity | 15 | 0 | 15 | Y |
| | Viscosity | 1.1 | 0 | 1.1 | R |
| | Fluid loss | 10.5 | 0 | 10.5 | R |
| Spacer | Wetting agent | 7.5 | 0 | 7.5 | Y |
| | Cement cont. | 68 | 68 | 0 | G |
| Wash train (chemicals mixed in 90 mT fresh water) | pH | 68 | 68 | 0 | G |
| | Base oil | 73 | 73 | 0 | Y |
| | Viscosity | 2.3 | 2.3 | 0 | G |
| | Surfactant | 26 | 26 | 0 | R |
| Slop chemicals | Solvent | 30 | 30 | 0 | Y |
| | pH | 5.6 | 5.6 | 0 | G |
| | H ₂ S scavenger | 3.8 | 3.8 | 0 | Y |
| Cementing chemicals | Biocide | 3.8 | 3.8 | 0 | Y |
| | Anti-sedimentation | 27 | 6 | 21 | G |
| | Dispersant | 7.5 | 3.0 | 4.5 | G |
| | Viscosifier | 0.8 | 0.8 | 0 | G |
| | Dispersant | 4.2 | 1.5 | 2.7 | Y |
| | Anti-foam | 1.1 | 0.9 | 0.2 | Y |
| | Extender | 3.4 | 1.3 | 2.1 | G |
| | Accelerator | 1.9 | 1.0 | 0.9 | G |
| | Fluid loss control | 8.3 | 2.3 | 6.0 | Y |
| | Class G cement | 249 | 65 | 185 | G |
| Total (excl. water) | | 3,862 | 1,532 | 2,330 | |
| | Total Red | 38 | 26 | 12 | |
| Total Yellow | | 860 | 116 | 743 | |
| | Total Green | 2,964 | 1,389 | 1,575 | |

The WBM and the cementing chemicals will partly be left in the well, and the remainder will be discharged to sea. The OBM chemicals will be sent to shore for treatment and disposal.

A limited number of chemicals will be used on the rig. It is assumed that all rig chemicals will be discharged to sea.

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The rig wash will be used for cleaning of the rig and rig equipment. The usage is estimated at 30 tons for the entire project corresponding, which will be 100% discharged over a period of 6 hours per day. The rig wash will be discharged with a concentration of 1:400 taking into account initial water use for dilution of the product and subsequent additional water use for rinsing.

The jacking grease will be used when jacking up and down and is expected to be 50% discharged over a period of 12 hours.

The drill pipe dope will be used in the wells and 10% is expected to be discharged over a period of 6 hours.

Table 5-20 Estimated use of utility chemicals.

| Utility chemicals | Planned use [tons] | Planned discharge [tons] | Colour code |
|------------------------------|--------------------|--------------------------|-------------|
| BOP fluid | 3.2 | 0 | Y |
| Pipe dope | 0.32 | 0.032 | Y |
| Rig wash | 30 | 30 | Y |
| Jacking grease / skid grease | 3 | 1.5 | Y |
| Total Yellow | 36.52 | 31.53 | |

5.6.3 Removal of installation and jacket piles

Before the removal of the topside process fluids, fuels and lubricants will be drained and transported ashore for disposal according to legal requirements.

The topside and the jacket will be dismantled and removed and transported to shore for further cleaning and recycling or reuse. Jacket piles will be cut approximately 1-3 meter below the seabed level dependent on sediment transportation in the area.

The topside is expected to be removed as a single lift either with a heavy lift vessel or by jack-up vessel similar to wind farm installation jack-ups.

The jacket is expected to be removed as a complete unit with a heavy lift vessel.

The removal of structures will prevent interference with fisheries in terms of damages to fishing gear. In addition, bans on fisheries within exclusion zones will be lifted.

Details about the structures to be removed is shown in Table 5-21.

Table 5-21 Information about facilities to be removed

| Surface facilities information | | | | | | |
|--------------------------------|--------------------|-------------------|-------------|----------------|-----------------|----------------------|
| Facility type | Topside facilities | | Jacket | | | |
| | Weight (Te) | Number of modules | Weight (Te) | Number of legs | Number of piles | Weight of piles (Te) |
| Fixed large steel jacket | 1,650 | 1 | 7,683 | 8 | 16 | 1,393 |

5.6.4 Leaving of pipelines and jacket piles

The pipelines will be emptied for hydrocarbons and flooded with seawater. The presence of decommissioned pipelines left in-situ and jacket piles left below the seabed level will slowly degrade and will not result in any significant impacts to the seabed or the pelagic or benthic communities.

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Exposed pipeline sections are rock-dumped or buried in the sediment for trawling protection.

5.6.5 Cutting piles

When a field on deeper waters is abandoned, piles of cuttings from the drilling operations are often encountered beneath platforms.

However, cuttings piles are not likely to remain in the relatively shallow waters (68 m) at Hejre and it also appears from subsurface surveys taken place around the Hejre jacket that the cuttings from the drilling operations have dispersed due to the relatively strong currents on the seabed and for that reason do not have a form to be able to remove.

5.6.6 Emissions to air

Air emissions can be expected from the operating fleet to execute and support the decommissioning activities such as jack-up rig, heavy lift vessel, standby boat and supply boats. The days include contingency for weather delays and unforeseen events.

Table 5-22 Overview of vessels to be used during decommissioning.

| Vessel type | Number of vessels | Days | Fuel consumption [m ³ /day] |
|----------------------------------|-------------------|------|--|
| Rig | 1 | 255 | 10 ¹ / 30 ² |
| Heavy Lift vessel | 1 | 83 | 47 |
| Supply vessel | 1 | 97 | 7 |
| Survey vessel (ROV) | 1 | 70 | 4 |
| Pipe Trench/Jet Skid | 1 | 5 | 30 |
| Rock dumping vessel | 1 | 8 | 27 |
| Offshore construction vessel | 1 | 28 | 20 |
| Diving support vessel | 1 | 320 | 24 |
| Standby boat | 1 | 255 | 10 |
| Tugs | 3 | 20 | 20 |
| Helicopters | 1 | 109 | 1.2 |
| ¹⁾ for jack-up | | | |
| ²⁾ average in DP mode | | | |

5.7 Waste and waste handling

Household waste and waste will be generated at the Hejre platform throughout the different phases from construction to decommissioning.

All waste generated at the Hejre platform will be thoroughly sorted into categories agreed with the waste handling company and according to the regulatory requirements of the municipality of Esbjerg. The sorted waste will be transported to shore for treatment at approved waste treatment or waste-to-energy plants or, if necessary, for final disposal.

The amount and the composition of waste will depend on the level of activities and the number of persons on board. More waste will typically be generated during maintenance and well service campaigns than during normal day-to-day operations and these special operations will also generate other types of waste. E.g., painting campaigns will generate sand from sandblasting.

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The amount of household waste is related to number of persons on board the rig or the installation.

5.7.1 Waste during construction

Waste generated during the construction phase will mainly be related to household waste from the rig, OBM mud and cuttings from the drilling operation.

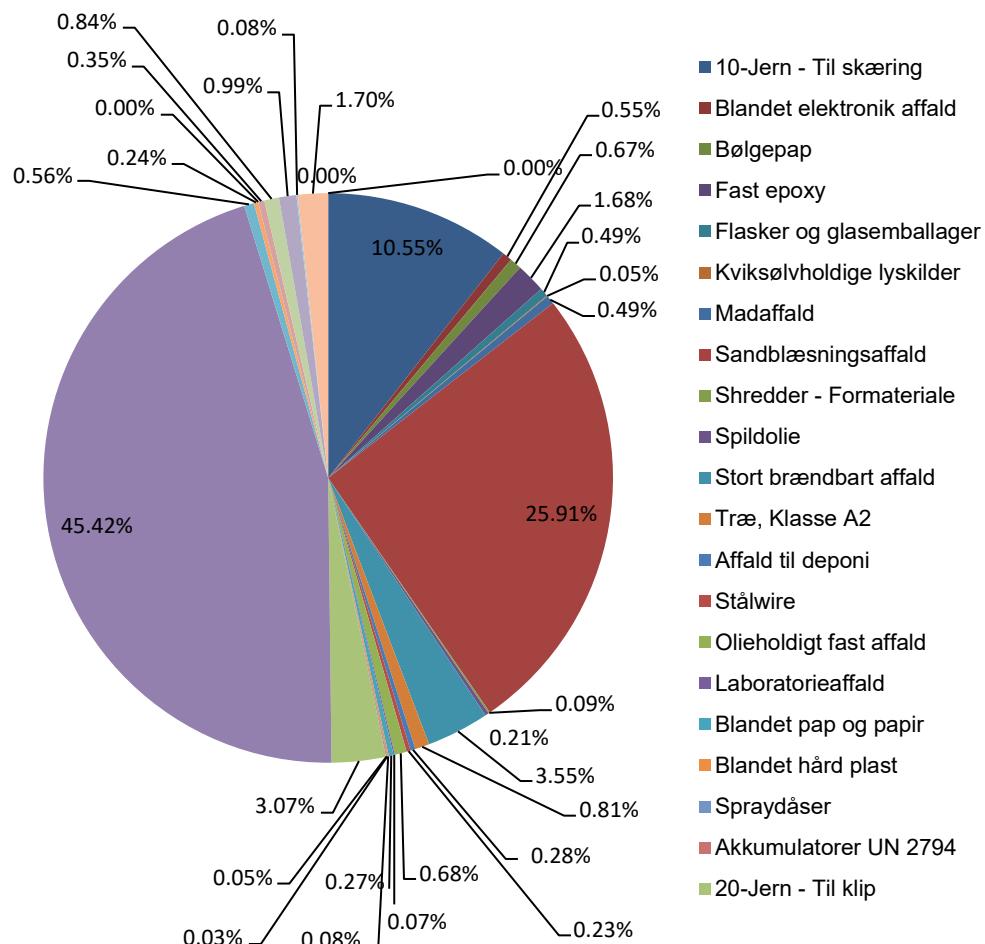
All waste generated during all project phases at Hejre and South Arne will be transported to Esbjerg by vessel. The waste will be further sorted out to improve recycling, sent for further treatment at approved waste treatment plants, for combustion or for final disposal.

OBM, chemicals and cuttings will be transported onshore for treatment and disposal.

5.7.2 Waste during production

Waste production at South Arne is not expected to change significantly due to tie-in of Hejre. Waste production at South Arne was approx. 271 tonnes in 2021, see Figure 5-13. The waste categories are shown in Figure 5-11 and waste treatment in Figure 5-12. The three main waste categories in 2021 were industrial waste, iron and sand from sandblasting. Most of the waste is sent for recovery or for incineration for energy production.

As Hejre will normally be unmanned, waste generated during the production phase is mainly household waste and other waste related to maintenance campaigns. Waste related to the production phase is estimated to be in the magnitude of 20-25 tonnes per year for Hejre. The waste types are expected to be similar to the waste from South Arne, although the distribution may vary from year to year depending on activities.



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Figure 5-11 Waste generated at South Arne divided into waste categories by weight (2021).

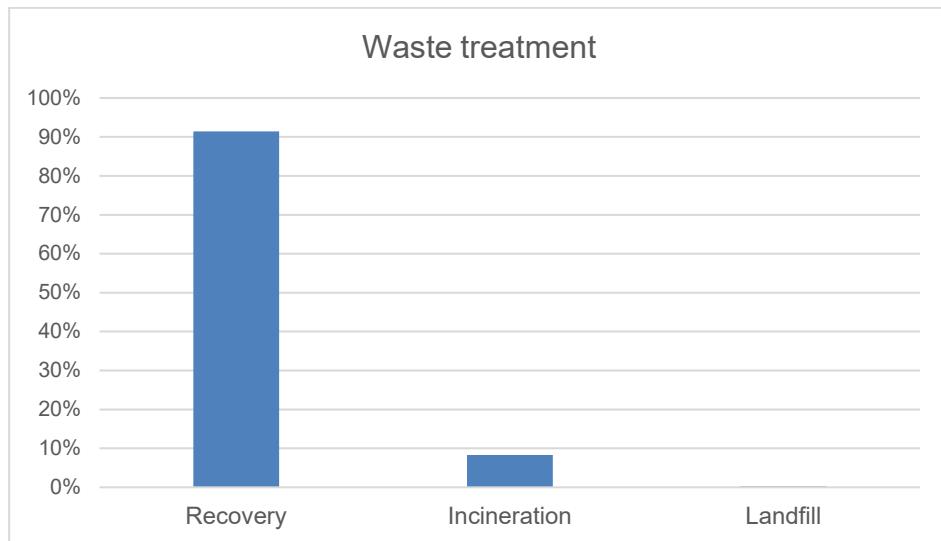


Figure 5-12 Information about treatment of waste from South Arne (2021).

5.7.3 Waste during decommissioning

Waste generated during decommissioning is mainly related to the offshore structures to be removed to shore for dismantling and recycling or reuse at an approved decommissioning yard in the North Sea region. Approx. 12,500 tons material is transported to shore, section 10.4. The main waste fraction from the structures is steel.

Also, household waste from the vessels and rig performing the decommissioning work will be generated, as well as approx. 3,000 tons OBM waste from the P&A activities. All waste will be transported to shore for further treatment.

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6. Description of the existing environment

This chapter describes the physical, biological, ecological and human use features and conditions in the North Sea, which are relevant for the assessment of impacts during the construction, operation and decommissioning phases of the Hejre tie-back to the host platform South Arne.

Please note that a full description of the existing environment can be found in the approved EIAs for Hejre Legacy and South Arne. This chapter updates these previous descriptions with the latest surveys in order to conduct the environmental assessments on the best possible foundation. However, this chapter focuses on describing the existing environment for those aspects that are potentially impacted by the activities described in this EIA.

6.1 Bathymetry

6.1.1 Bathymetry and water depths

The Hejre tie-back to the host platform South Arne is located centrally in the North Sea around 300 km west of Jutland. Both oil fields are situated northeast of the Dogger Bank on water depths around 62-73 m (Table 6-1).

Table 6-1 Water depth at Hejre (Dong E&P 2013) and South Arne (INEOS 2022).

| Field | Water depth (m) |
|------------|-----------------|
| Hejre | 68 – 73 |
| South Arne | 62 |

6.2 Hydrographical conditions

The North Sea is a semi-enclosed sea. The currents are mainly driven by the topography and determined by the water inflow from the North Atlantic through the English Channel, river outflow and the out-going currents from the Baltic Sea. The general circulation of the tidal currents in the North Sea is characterised by a strong north going current along the continental coast and an east going current in the central North Sea (Otto et al. 1990).

The prevailing currents at the Hejre and South Arne fields are east-going (Figure 6-1).

Hydrographical fronts are created where the different water masses meet and include upwelling, tidal fronts and saline fronts:

- **"Tidal fronts"**, which are found in areas between stratified water masses and water, which is fully mixed due to tidal currents. Such fronts are developing in the western and southern parts of the North Sea during the summer;
- **"Upwelling fronts"** which may be encountered in areas along the coast where the water masses are stratified. The front develops when the wind blows surface water away from the coast and thereby forcing bottom water to the surface. Such fronts are frequently developing in Kattegat, Skagerrak and along the Norwegian coast;
- **"Salinity fronts"** are found in areas where high salinity water masses meet water masses with lower salinity.

Hydrographical fronts are generally high productive areas since nutrients are brought from the seabed to the surface waters. The Hejre tie-back to South Arne is located outside areas with the potential to develop hydrographical fronts and is consequently a low productive area (Edelvang et al. 2017, OSPAR 2000). Areas with hydrographical fronts are shown on Figure 6-1.

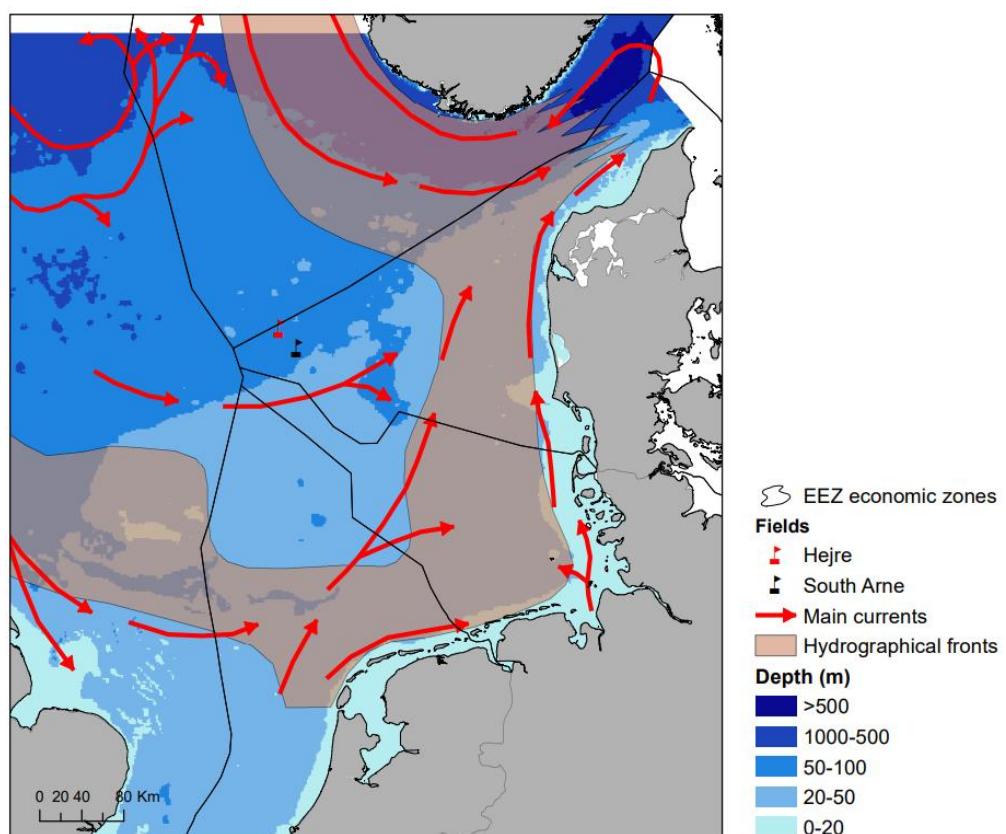


Figure 6-1 General circulation of surface currents in the North Sea and the location of areas in the North Sea where hydrographical fronts may develop (OSPAR 2000).

6.2.1 Thermocline

The water masses around the Hejre and South Arne oil fields are fully mixed during winter (OSPAR 2000). During the summer period, the sun heats up the upper water layers in the central and northern North Sea including the area of Hejre and South Arne. A thermocline is developed, which separates the upper and lower water masses (van Leeuwen et al. 2015). The separation is due to differences in density and prevents exchange of nutrients and oxygen between the water masses. During the autumn, storms and cooling of the surface waters breaks down the thermocline and the water masses are mixed again.

In more shallow waters of the southern and eastern parts of the North Sea, the water masses remain mixed during the summer due to strong currents (van Leeuwen et al. 2015).

6.3 Water quality

An integrated assessment of the chemical status in Europe's seas has been published (EEA 2018) and it is concluded that most assessment units in the Danish part are classified as "problem areas" and thereby not fulfilling the objective of a good environmental status according to the EU's Marine Strategy Framework Directive. This impaired state is caused by a combination of input of contaminants from sources on both land and sea, in addition to input from atmospheric deposition. However, there is a general tendency for the water quality to be less problematic the further away from land, and both Hejre and South Arne are located quite a distance from the nearest land.

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The implementation of EU's Marine Strategy Framework Directive requires an assessment of the environmental status in the North Sea (among others). For contaminants the objective of achieving a good environmental status is currently not achieved due to an exceedance of the threshold levels in fish for PBDE and mercury (Ministry of Environment and Food 2019).

6.4 Seabed

The oil- and gasproduction operators in the Danish part of the North Sea conduct monitoring of the seabed at selected platforms every three years. This chapter is in general based on this long term monitoring, except for the general section "Sediment composition in the North Sea".

The data from the biological and chemical monitoring of the seabed around the South Arne platform conducted during the period 6-12 June 2021 has been used for this evaluation.

The most recent and to date the only monitoring around Hejre was conducted in 2013. The results from this baseline monitoring has not been assessed in relation to the descriptors in the Marine Strategy Framework Directive. It is expected though, that Hejre will be comparable to the general findings for the area.

The monitoring of the chemical and biological conditions of the seabed around South Arne serves as basis to describe the conditions for the following descriptors according to the Danish Marine Strategy II:

- Descriptor 1: Biodiversity (state descriptor)
- Descriptor 2: Non-indigenous species (pressure descriptor)
- Descriptor 6: Seafloor integrity (state and pressure descriptor)
- Descriptor 8: Contaminants (pressure descriptor)

6.4.1 Benthic Fauna and Biodiversity (D1)

The benthic fauna includes invertebrates living in and on the surface of the seabed. The benthic fauna mainly includes species of bristle worms, bivalves, snails, echinoderms and crustaceans.

Bivalves, echinoderms and polychaetes are the most important components of the benthic biomass. The most abundant species included the bristle worms *Myriochele oculata* (=*Galathowenia oculata*), *Spiophanes bombyx* and *Paramphius jeffreysii* and the echinoderm *Amphiura filiformis*. These findings comply with findings of Reiss et al. (2010). The ocean quahog (*Arctica islandica*) was found at several stations with an average density of 6.7 individuals/m² across all stations.

During the June 2013 baseline survey at the Hejre field, 115 benthic fauna species were found with an average of 47 species per m² (DONG E&P A/S 2013). Bivalves and echinoderms dominated the biomass, contributing to 50% and 34% of the total fauna dry weight, respectively.

Polychaetes were the most species rich group making up 47% of the species followed by crustaceans (18%) and bivalves (12%) at Hejre (Figure 6-2). Similar species composition was found at the reference station. A sum of 277 individuals was found per 0.1 m². Polychaetes made up 82% of the abundance (Figure 6-2). In comparison, polychaetes made up 78% of the benthic fauna abundance at Ref.N-0-13.

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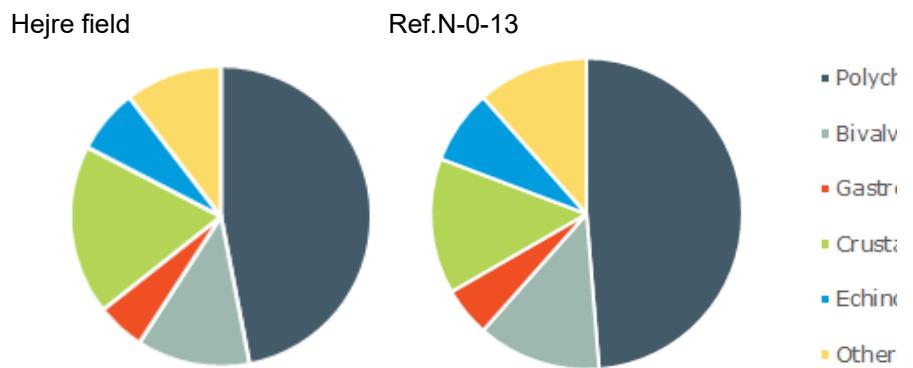


Figure 6-2 Benthic fauna composition at the Hejre field and reference station Ref.N-0-13p monitored in 2013 (DONG E&P 2013). The data is presented as species richness in percentage.

The seabed at and around the South Arne platform has no hard substrates but consists of a flat sandy seabed. The benthic fauna consists therefore mainly of benthic infauna, that is species living in the sediment rather than on the seabed.

On average a total of 31 (± 5 SD) species were found for all monitoring stations and there was no significant change in the number of species in relation to the distance from the South Arne platform. In contrast, the number of individuals was on average higher at the monitoring stations closer to the platform – up to a distance of 750m as the values at 1500m and 3000m were comparatively lower (INEOS 2022).

The species diversity seems to be lower around the South Arne platform compared to the reference station (Figure 6-3). Further there seems to be an increase in species diversity with increased distance from the platform.

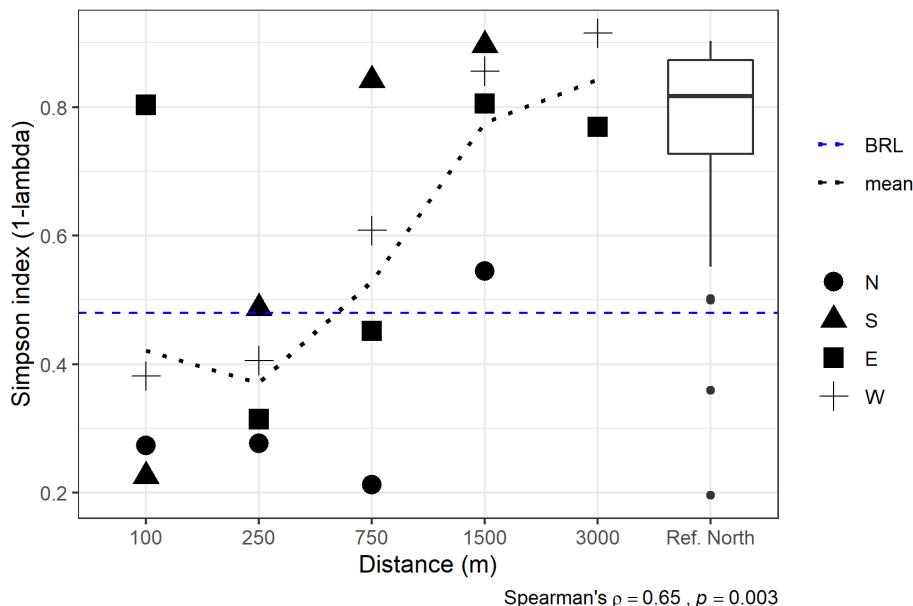


Figure 6-3 Species diversity expressed by the Simpson index, $1-\lambda'$, based on sample sizes of 0.1 m^2 , at the stations around the South Arne platform (INEOS 2022). Note that the box plot represents the historical data from reference stations in the northern region of the Danish sector (Ref.North, including Ref.N.21), showing the 2.5, 25, 50, 75 and 97.5 percentiles. Black dots for Ref.North represent outliers.

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An analysis of the 10 most important species, contributing most to the difference in abundance between the monitoring stations around the South Arne platform, has been performed and the results can be seen in Table 6-2.

Table 6-2 Overview of the 10 most important species contributing most to the differences between stations (on average) around the South Arne platform (INEOS 2022).

| Species | Contribution (%) |
|---------------------------------|------------------|
| <i>Galathowenia oculata</i> | 16.3 |
| <i>Spiophanes bombyx</i> | 2.6 |
| <i>Mediomastus fragilis</i> | 2.3 |
| <i>Aonides paucibranchiata</i> | 2.3 |
| <i>Edwardsia sp.</i> | 2.2 |
| <i>Actiniaria</i> | 2.2 |
| <i>Pectinaria koreni</i> | 2.2 |
| <i>Ophiura sp.</i> | 2.1 |
| <i>Paramphipnoma jeffreysii</i> | 1.9 |
| <i>Nemertea</i> | 1.8 |

It is noted, that in the existing Danish Marine Strategy II (Ministry of Environment and Food 2019) a good environmental status (GES) has not been established for D1. An environmental index for Biodiversity (D1) has therefore been calculated and can be seen in Figure 6-4. There is a significant change in the environmental index with distance from the South Arne platform, with the lowest score close to the platform. This is due to a lower score of both species richness and species diversity close to the platform.

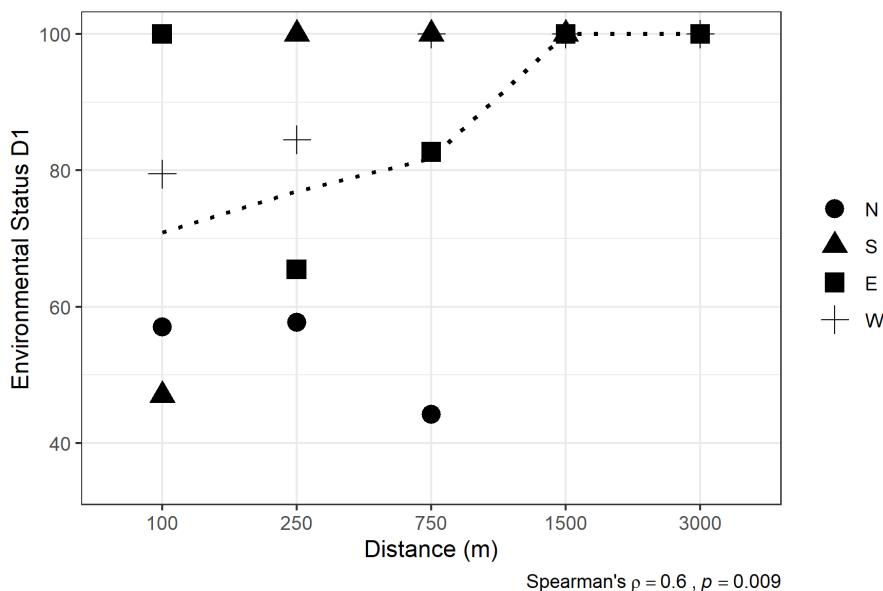


Figure 6-4 An environmental index for biodiversity (D1) where the dotted line represents the mean index across stations at the same distance from the South Arne platform (INEOS 2022).

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6.4.2 Non-indigenous species (D2)

Non-indigenous species (NIS) are not as such a part of the regular monitoring performed by the operators, thus specific information on NIS are derived from two external resources, namely AquaNIS (information system on aquatic non-indigenous and cryptogenic species) and EASIN (European Alien Species Information Network). The species found at South Arne platform was compared to the species within the two databases and revealed the presence of one NIS at 5 stations, namely the bristle worm *Glycera celtica*. The 5 stations where *G. celtica* was found are all located close to the platform (≤ 750 m) (INEOS 2022).

It is noted that in the existing Danish Marine Strategy II (Ministry of Environment and Food 2019) a good environmental status (GES) has not been established for D2. An environmental index for non-indigenous species (D2) has therefore been calculated for the South Arne platform and can be seen in Figure 6-5. An environmental value of 100 indicates no non-indigenous species, so the closer the index is to 100 the less of an impact there is from non-indigenous species. As all the specimens of *G. celtica* were found close to the platform, there is an increase in the environmental index with distance from the platform.

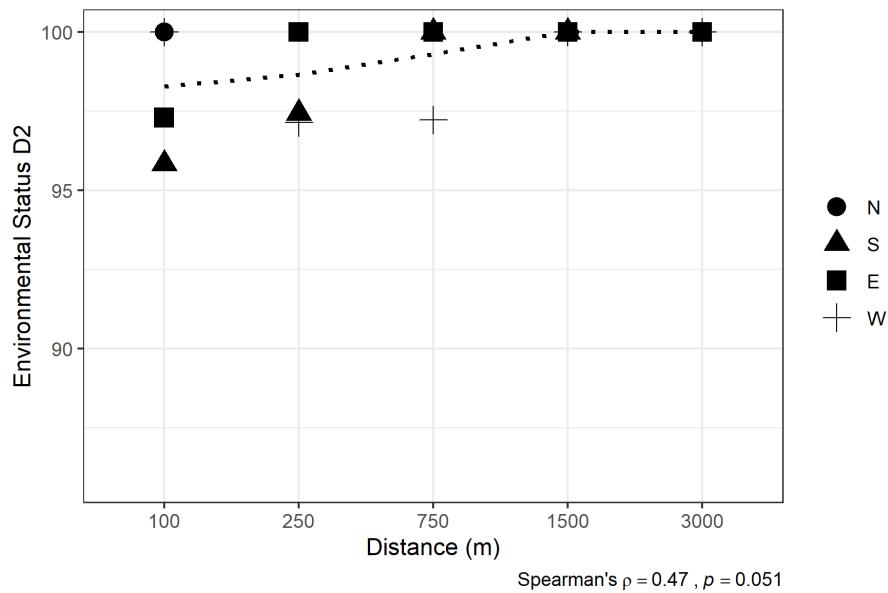


Figure 6-5 An environmental index for non-indigenous species (D2) where the dotted line represents the mean index across stations at the same distance from the South Arne platform (INEOS 2022).

6.4.3 Seabed Integrity (D6)

The AZTI Marine Biotic Index (AMBI) is used to describe the seafloor integrity. AMBI values can range between 0 and 7, where a value of 7 represents an azoic condition, i.e. where no macrobenthic organisms are present.

AMBI has been calculated for all monitoring stations around the South Arne platform including a regional reference station (Figure 6-6).

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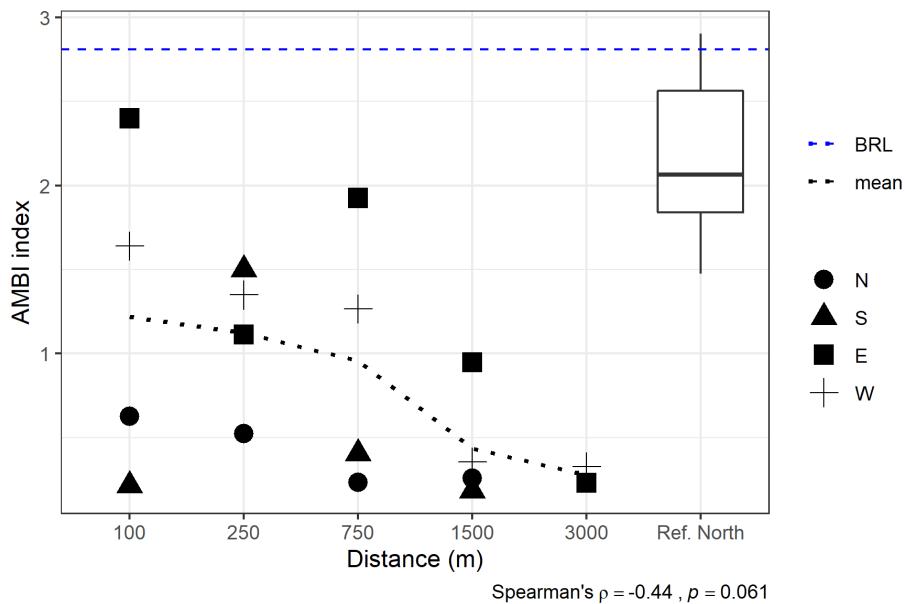
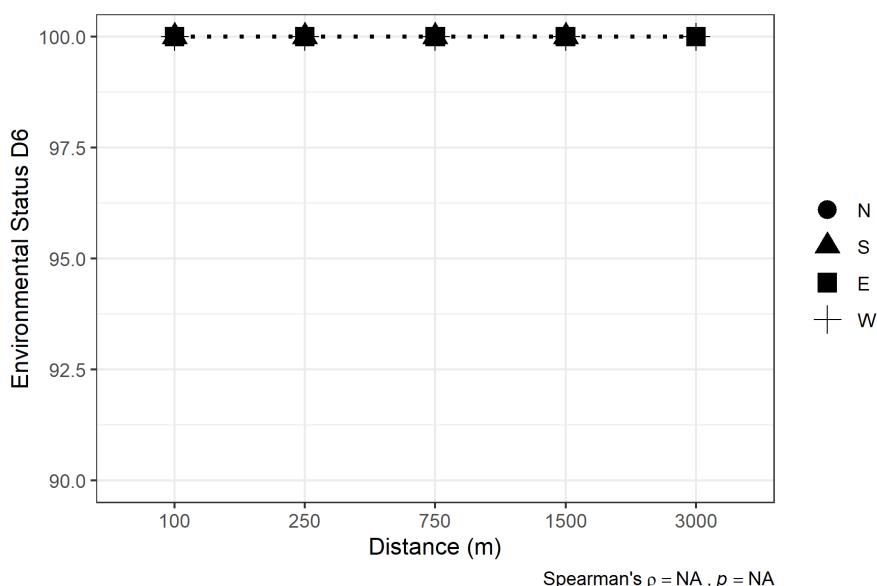


Figure 6-6 AMBI calculated for the stations around the South Arne platform (INEOS 2022). Mean value trends are indicated by the black dashed line. BRL: Background Reference Levels. The box plot represents the historical data from reference stations in the northern region of the Danish sector.

The average AMBI at the platform stations (0.86; SD = 0.68) was slightly higher (indicating fewer good conditions, see above), compared to the average of the regional reference stations (0.76). However, the AMBI changed significantly between monitoring stations and distances to the platform, with the eastern stations having the highest AMBI at most monitoring stations (indicating least good conditions). All monitoring stations had an AMBI well below the Background Reference Levels (BRL). There was a trend for a negative correlation of AMBI index to the distance to the South Arne platform, however it was not a significant trend due to high variability within the distances (INEOS 2022).

It is noted, that in the existing Danish Marine Strategy II (Ministry of Environment and Food 2019), a good environmental status (GES) has not been established for D6. An environmental index for Seabed Integrity (D6) around the South Arne platform has therefore been calculated and can be seen in Figure 6-7. All monitoring stations scored an index value of 100 and therefore a general pattern for all platform stations cannot be established.



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Figure 6-7 An environmental index for seabed integrity (D6) where the dotted line represents the mean index across stations at the same distance from the South Arne platform (INEOS 2022).

6.4.4 Sediment composition in the North Sea

The Danish sector of the North Sea is characterized by a sandy or sandy to muddy sediment. A few areas have silt or coarse sediment. The substrate type at the Hejre and South Arne fields is categorised as "mud to muddy sand" (Figure 6-8).

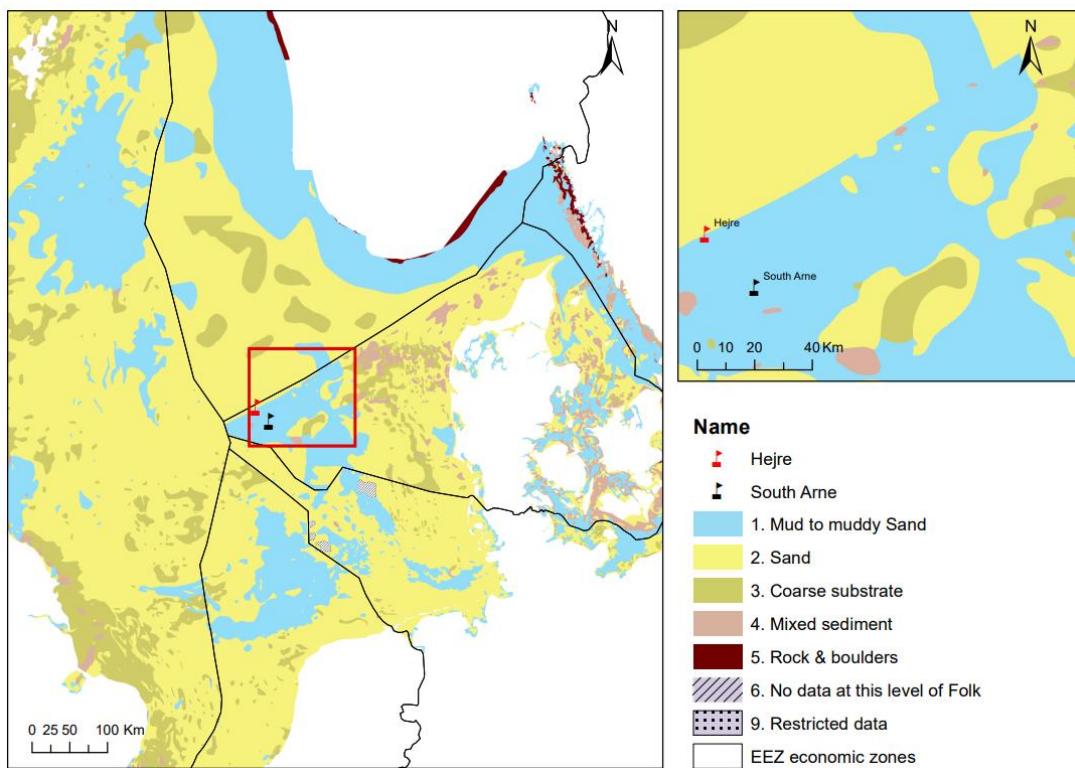


Figure 6-8 Substrates in the North Sea with indication of the project area. EMODnet reclassification substrate (GEUS2019). Note that classification of substrate may vary between national borders.

6.4.5 Sediment composition and sediment quality at Hejre and South Arne

Baseline descriptions of the composition of sediments and sediment quality at the Hejre and South Arne fields are based on monitoring data collected in 2013 at the Hejre field (DONG E&P A/S 2013) and in 2021 for the South Arne platform (INEOS 2022). The monitoring stations (24 stations) were positioned in a classical cross-design used by oil and gas operators since 1989. The stations are compared to a reference station (Ref.N) located approx. 12-39 km from the fields. In general, it has been found that the benthic fauna is not affected beyond 1500 meters from the platforms and that the local reference stations have good environmental status according to the MSFD (Oil & Gas Denmark 2017). Based on this, the local reference station is considered as appropriate background reference.

6.4.5.1 Sediment composition

A baseline survey was conducted at the Hejre field in May 2013 after the area has been explored, but before any drilling or construction activities took place. The investigation revealed a sediment consisting of fine sand with a very low content of organic material (DONG E&P A/S 2013). The grain size of the surface sediment was 0.17 ± 0.01 mm. Fine brown sand was found at all stations in the upper 2 cm of the sediment. Below the surface layer, grey sand with or without shells was found. Black spots in the sediment were found at one station indicating locally anoxic conditions.

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The concentration of organic material measured as loss on ignition (LOI) was measured to $0.79 \pm 0.13\%$ with increasing concentration with distance from the Hejre field. The higher concentration of organic matter is caused by accumulation of organic material at the deeper stations, which are found in the periphery of the sampling area.

Smell of dissolved hydrogen sulphide (H_2S) was not detected confirming generally oxic conditions. Oil smell was observed, but the source is unknown.

Monitoring around the South Arne platform in 2021 (INEOS 2022) revealed that the seabed can be characterised as "fine sands". This characterization is based on a grain size analysis and the variation between the samples was relatively low with a median size (D50) of around 0.16 (± 0.003 mm SD). The colour of the surface sand was generally grey where the depth of oxidised sediment was between 3-7 cm. Some of the stations had a smell of hydrogen sulphide (H_2S) indicating anoxic conditions.

6.4.6 Contaminants (D8)

6.4.6.1 Contaminants in sediments

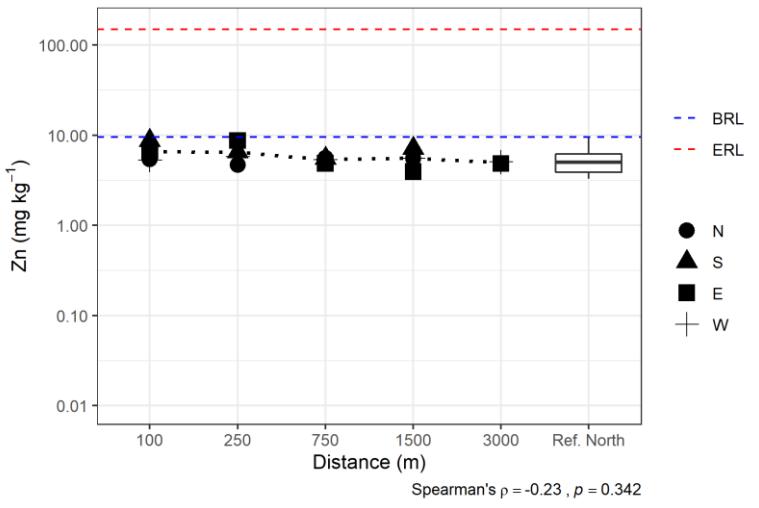
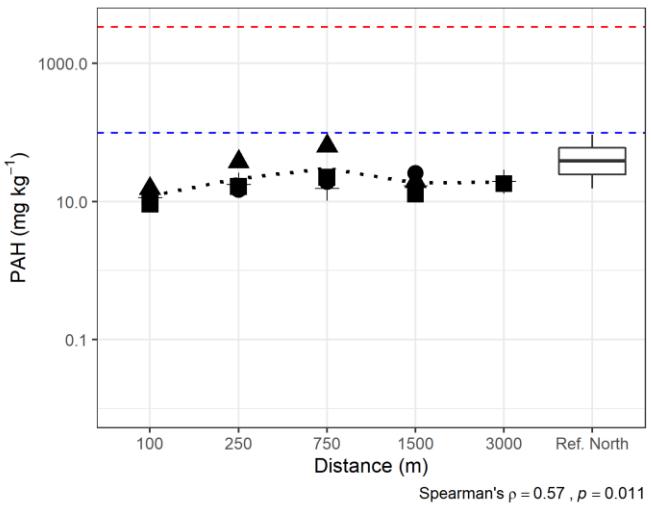
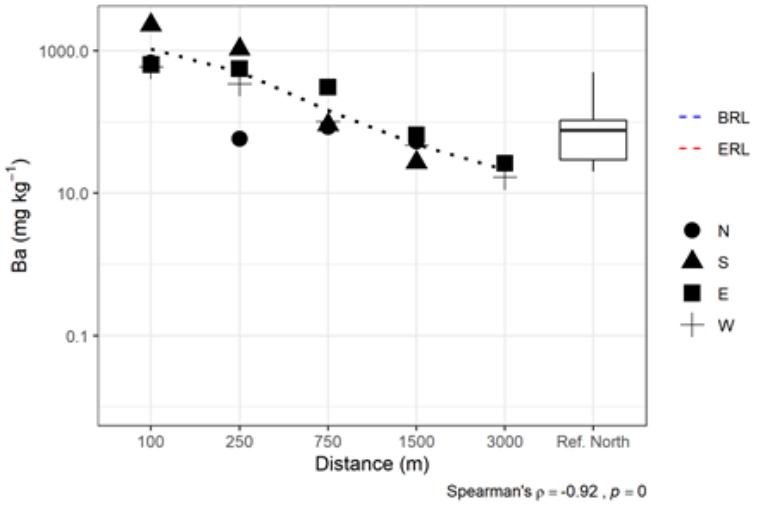
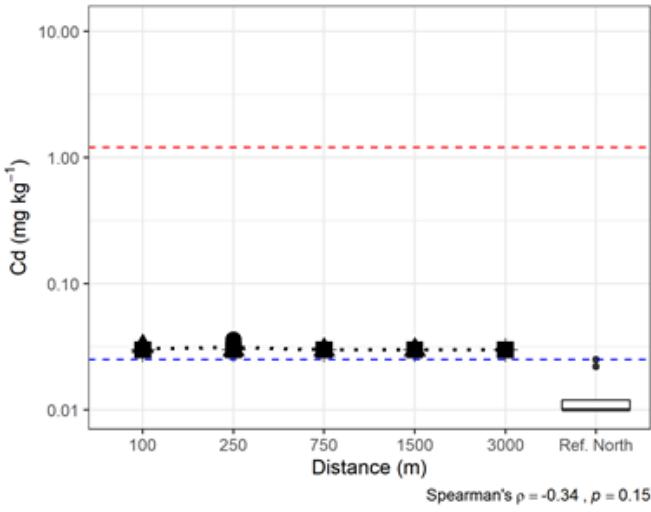
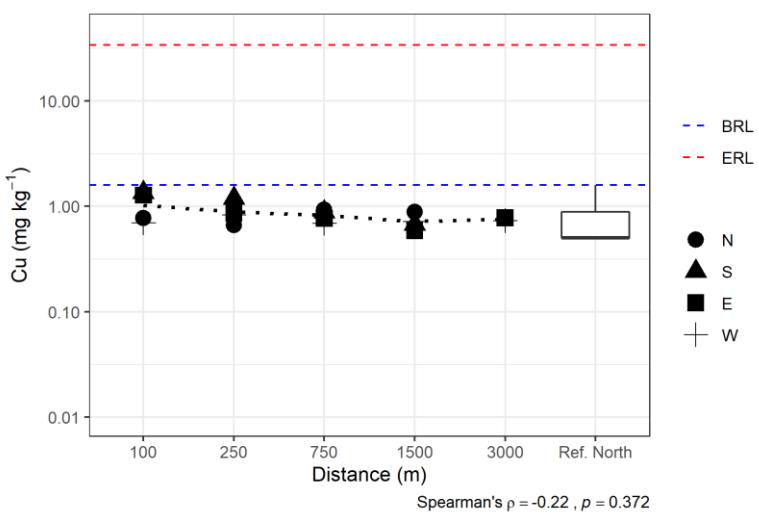
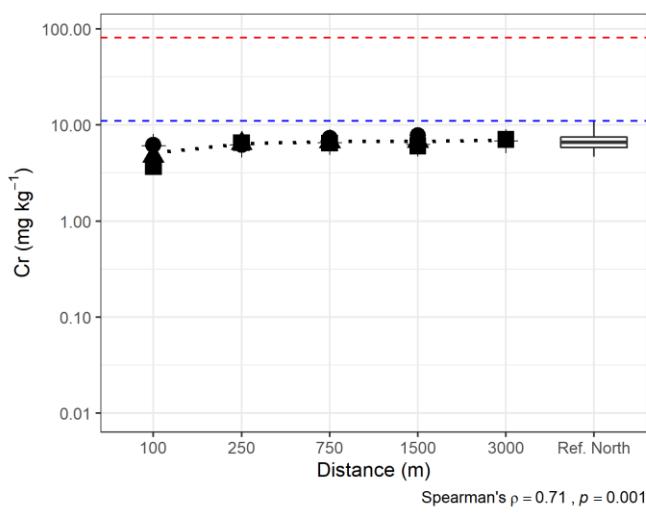
The 2013 baseline survey (DONG E&P A/S 2013) at the Hejre field included the following contaminants: Polycyclic Aromatic Hydrocarbons (PAH), sum of naphthalenes, phenanthrenes and dibenzothiophenes (NPD), Total hydrocarbons (THC) and heavy metals: Barium (Ba), Cadmium (Cd), Chromium (Cr), Copper (Cu), Mercury (Hg), Lead (Pb) and Zinc (Zn). A reference station (Ref.N-15-0) located 39 km northeast of the Hejre field was used to estimate the Background Reference Level (BRL).

Absolute concentrations of PAH, NPD and heavy metals were below the assessment criteria (ERL). Overall, there were no difference between samples from the Hejre field and the reference station. The concentration of THC was under detection level (1 mg/kg) at most stations. However, at the most northerly station THC were significantly above detection level, but still below the assessment criteria (ERL).

Few stations at the Hejre field had increased level of Barium. Ba is a component of drilling mud, and the enhanced levels may be due to previous drilling activities. Concentrations of Ba in the sediment profiles (0-10 cm) was between 38 and 180 mg/kg DW. Ba is not toxic, and therefore no assessment criteria are defined. Levels above ca. 10 mg/kg DW are considered above natural level.

Absolute concentrations of Cd, Cr, Cu, Zn and Pb were well below ERL and Lower Action Level for dumping of seabed material defined by the Danish EPA and thus characterised as having no expected negative impact on marine organisms. Furthermore, Pb concentrations were all below detection level.

An assessment of contaminants in the sediment around the South Arne platform was conducted in 2021 (INEOS 2022). Chemical analysis was conducted for a range of parameters, and the results can be seen in Figure 6-9.



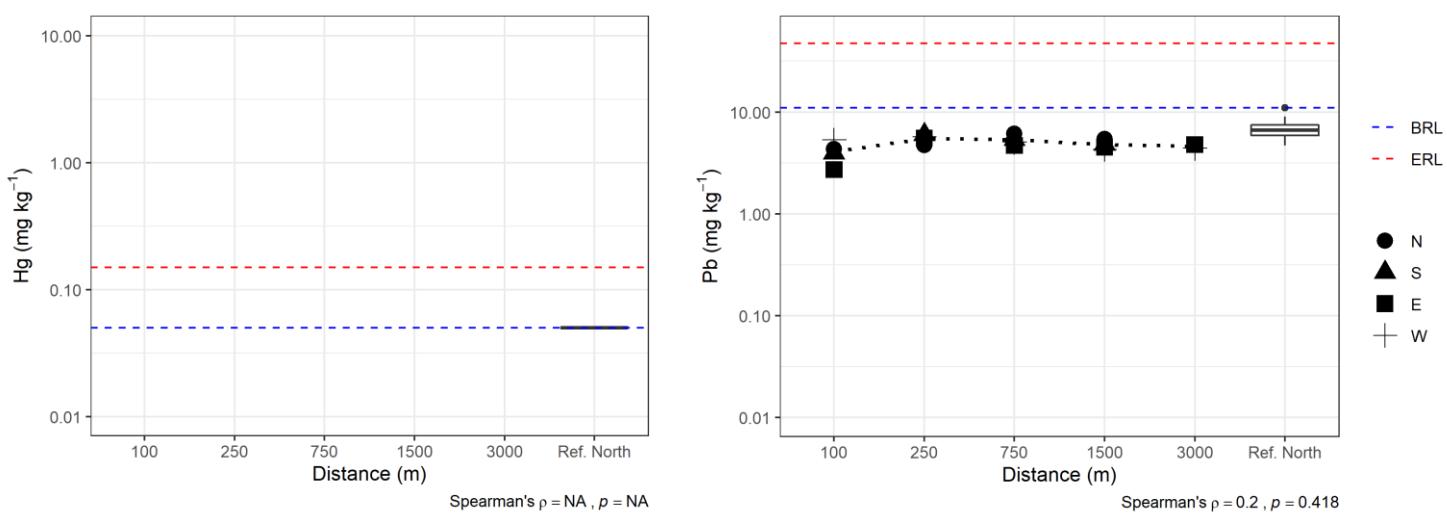


Figure 6-9 Concentrations of contaminants, metals and PAHs around the South Arne platform. The concentrations are in the surface sediment (0-1 cm) (INEOS 2022). Mean values are indicated by the black dashed line. BRL: Background Reference Levels (blue dashed line). ERL: Effects Range Low (red dashed line). PAHs included: Anthracene, Benzo(a)anthracene, Benzo(a)pyrene, Benzo(ghi)perylene, Chrysene/tri-phenylene, Dibenzoepiophene, Fluranthene, Indeno(1,2,3)pyrene, Naphthalene, Phenanthrene, Pyrene/thi-phenylene.

For the heavy metals all concentrations were below the HELCOM/Danish Targets. For one metal, Barium, the concentration was at certain locations above the TEL (low range for potential toxicological effect) and significantly higher near the South Arne platform (Figure 6-9). There is however no ERL (Effects Range Low) available for Barium.

Similarly, for the hydrocarbons all concentrations were below the HELCOM/Danish Targets and potential effect levels, with the exception of Anthracene in one location (100m east of South Arne). However, as Anthracene (and other PAHs) binds to the organic component in the sediment, it relates proportionally to the TOC concentration. As the TOC concentration is very low around South Arne and particularly at the specific location 100m east of South Arne, both the TOC and Anthracene concentrations are close to the LoQs. Thus, the exceedance is not considered to be significant. One or more of the summed parameters (THC, ΣPAH_{EPA16} and ΣNPD) showed elevated concentrations at the southern stations closest to the platform (100-750m). At these locations the smallest of the PAHs Naphthalene was also detected.

In general, there were no correlation between distance from the South Arne platform and the concentration of metals, except for barium which tends to decrease in concentration with distance from the platform. Barium is associated with drilling activities.

Threshold values for 4 substances (PFOS, PBDE, benz(a)pyrene and mercury) have been defined to describe Good Environmental Status, however these threshold values are based on concentrations in fish and mussels. These concentrations have not been established as part of the regular monitoring program and therefore an environmental index for contaminants (D8) has been calculated and can be seen in Figure 6-10. The score was calculated to 98 at all stations except for the southern monitoring station located 750m from the South Arne platform, at this station most of the individual PAHs were higher than BRL. In relation to distance from the platform, no significant correlation was determined.

The main cause of the uniform score of 98 was mainly caused by the Cadmium load which was below the limit of quantification (0.1 mg/kg DW), corresponding to a limit of detection of 0.03 mg kg⁻¹ on all stations at the South Arne platform. The BRL is 0.01 mg kg⁻¹, lower than the presented concentration levels, which then yields a score of 98 (INEOS 2022).

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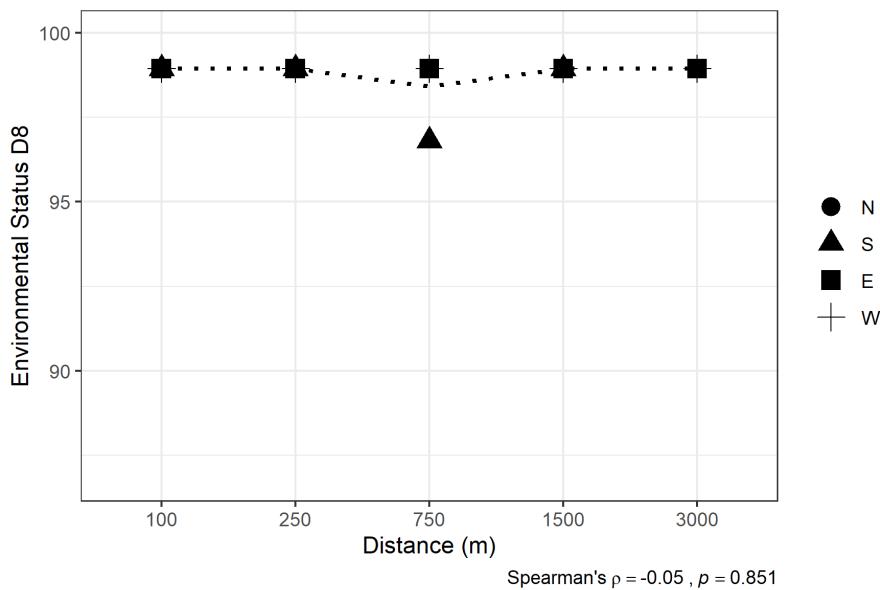


Figure 6-10 An environmental index for contaminants (D8) where the dotted line represents the mean index across stations at the same distance from the platform (INEOS 2022).

6.4.7 Environmental Status (ES)

Four MSFD descriptors have been assessed for the South Arne field above: Descriptor 1: Biodiversity, Descriptor 2: Non-indigenous species, Descriptor 6: Seafloor integrity and Descriptor 8: Contaminants, each described by indicators, which were scored against a specific Background Reference Level (BRL) to give an indicator-index value. This index-value (environmental index) can score between 0-100, where the value 100 is when the pressure or state is comparable or superior to conditions described for the BRL-value. The indicator-index values were combined to an index (score) describing the environmental status (ES).

The Environmental Status Score (EnS) was on average for all stations 94 ± 8 and was significant dependent on the distance to the South Arne platform. At 100m distance to the platform the average EnS was 89 while further away the average EnS was 100, however these scores exhibit large variation for each distance depending on the direction (Figure 6-11).

The northern direction had a lower than 90 EnS on all stations besides at 1500m distance, while west had a lower than 95 EnS on the two closest stations. Southern stations only had the station closest to platform an EnS of 79 while all other stations scored 100. Eastern stations showed EnS without a trend of distance dependency, interchangeably lower than average scores dependent on distance.

The overall Environmental Status score (EnS) at the South Arne platform showed that most stations scored on average 94, indicating a 'good' environmental status.

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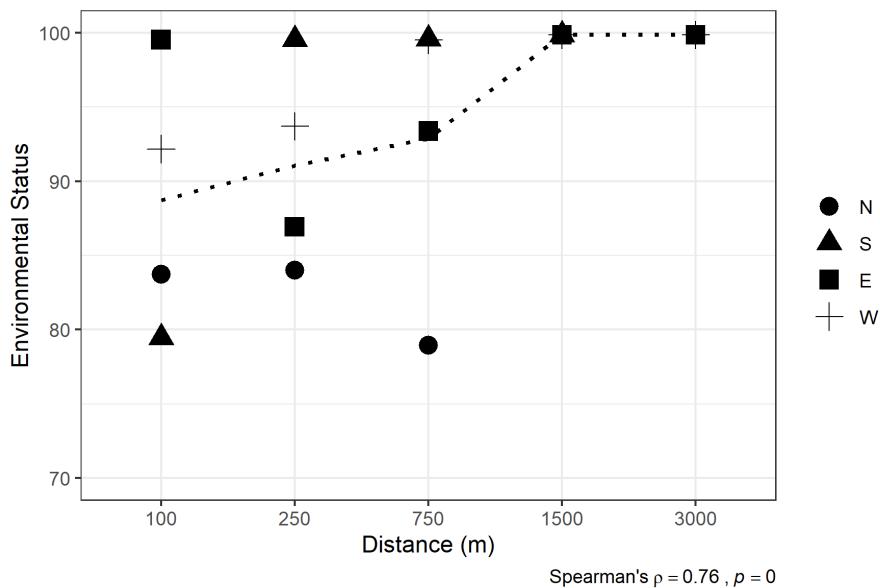


Figure 6-11 Environmental Status Score for each monitoring station and each distance, where the dotted line represents the mean index across stations at the same distance from the South Arne platform (INEOS 2022).

The ES of the Hejre field has not been assessed after the MSFD and the EnS is therefore unknown. However, the results from the baseline study prior to drilling activities is assessed to correlate with the conditions at the reference station (Ref.N).

6.5 Ecological conditions

6.5.1 General characteristics

The Hejre and South Arne fields are low productive areas and with low value for fish larvae and juvenile fish (although spawning takes place in the area), and the density of seabirds is low.

In the following, the ecological conditions in the project area are described in more detail.

6.5.2 Primary production

Hejre and South Arne are situated in an area with low primary production. This is due to the lack of hydrographical fronts and strong stratification of the water column in the productive summer season, which result in quick depletion of nutrients in the surface waters (Peeters & Peperzak 1990).

In the coastal areas of the North Sea, fronts may develop creating high productive areas (OSPAR 2000, Edelvang et al. 2017). In addition, runoff of nutrient rich water from land supports high primary production in the coastal areas.

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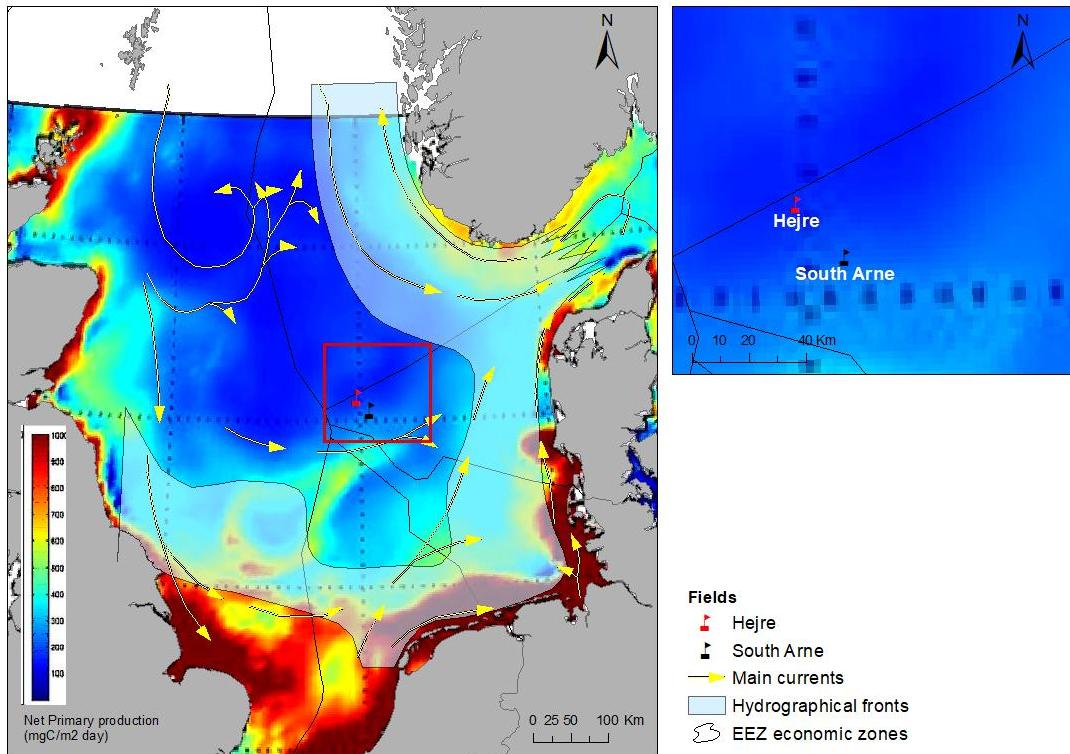


Figure 6-12 Net primary Production ($\text{mg m}^{-2}\text{d}^{-1}$), modelled yearly average for a representative year (OSPAR 2000).

6.5.2.1 Plankton

Plankton constitutes the base of the trophic food web and includes phytoplankton (pelagic microscopic algae) and zooplankton (pelagic microscopic animals) drifting passively with currents. Zooplankton includes both organisms that stay planktonic during the entire life cycle (holoplankton) and organisms that are only planktonic in the earliest life stages (meroplankton) such as larvae of fish, sea urchins, starfish, mussels, bristle worms, shrimps, crabs and lobsters.

6.5.2.2 Phytoplankton

Phytoplankton blooms occur during spring in the entire North Sea as the light returns and the water masses become stratified. Diatoms and autotrophic dinoflagellates dominate the phytoplankton in the North Sea. During summer, the biomass of plankton decreases due to stratification of water columns and the depletion of nutrients in the surface waters. A minor bloom is often observed during the autumn, when the waters are mixed again, and nutrients are again available in the surface waters.

6.5.2.3 Zooplankton

Copepods dominate the zooplankton in the North Sea. Copepods are food for fish and other organisms, including larvae, juveniles and mature individuals of many commercially important fish species such as herring and sprat. The composition of the copepod populations in the North Sea is dominated by *Calanus finmarchicus* and *C. helgolandicus*.

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6.6 Fish

Approximately 230 fish species are found in the North Sea. Compared to other areas in the North Sea, the diversity is low but increases westwards towards the coast. The fish species in the North Sea can be grouped in pelagic species (species living in the free water masses) and demersal (bottom dwelling) species. A single fish species, the European sturgeon, is on the appendix IV, and is described at the end of this chapter. Biology and distribution patterns of common species are described in Table 6-3 below.

6.6.1 Pelagic species encountered in the project area

Pelagic species commonly found in the Danish sector of the North Sea include Herring (*Clupea harengus*), sprat (*Sprattus sprattus*) and mackerel (*Scomber scombrus*). The biology of these species is described in Table 6-3.

Table 6-3 Biology of the dominating pelagic fish species that may be encountered at Hejre and South Arne.

| Species | Distribution and biology | References |
|---|---|--|
| Herring (<i>Clupea harengus</i>)  | <p>Herring is numerically one of the most important pelagic schooling species in the North Sea and is an important commercial species. Herring may be found all over the North Sea. They form large shoals, which tend to remain close to the seabed during the day. At dusk, the herring follow their prey (zooplankton), move towards the surface, and disperse over a wider area during the night.</p> <p>There are several different stocks of herring in the North Sea of which, the Orkney-Shetland, Bucan, Bank and Downs stocks represent the bulk of the stocks. During the spawning season the different stocks migrate to specific spawning grounds. Peak: December-January). Herring deposits its sticky eggs on coarse sand, gravel, shells, rocks or stones on the seabed. After hatching larvae drift with the currents south and eastwards towards nursery areas in the Skagerrak and along the Danish coast to Southern Bight.</p> | ICES 2019a, Sundby et al. 2017, Warnar et al 2012, Schmidt et al. 2010, Worsøe et al. 2002 |
| Sprat (<i>Sprattus sprattus</i>)  | <p>Sprat is a small-bodied pelagic schooling species that is mainly landed for industrial processing. Sprat is most abundant in the eastern part of the central North Sea, in the southern North Sea and in the Kattegat. Sprat spawning areas extent through the southern North Sea, the German Bight, the west coast of Jutland and in Kattegat. Spawning also occurs northwards along the English and Scottish coast.</p> <p>The main spawning areas are found in the German Bight, in the Southern Bight and in the English Channel. Spawning occurs during spring and late summer, with peak spawning during the period May - August. Sprats are multiple batch spawners with females spawning repeatedly throughout the spawning season (up to 10 times in some areas). The eggs and larvae are pelagic.</p> | ICES 2019a, Sundby et al. 2017. |
| Mackerel (<i>Scomber scombrus</i>)  | <p>Mackerel are widespread throughout the North Sea. During winter, both immature and mature mackerel tend to be more abundant along the edges of the continental shelf and the Norwegian Deep, as well as the central parts of the North Sea. Abundance increases during the summer, when mackerel enter the Southern Bight through the Channel and the northern North Sea around Scotland.</p> <p>Mackerel make extensive annual migrations between feeding, wintering and spawning areas. Spawning occurs in the central and northern North Sea between May and July with peak spawning in June. Eggs and larvae are pelagic.</p> | ICES 2019a, Sundby et al. 2017 and Worsøe et al. 2002. |

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6.6.2 Demersal species encountered at the project area

The abundance of demersal (bottom dwelling) fish species in the project area is relatively low compared to other areas in the North Sea (ICES International Bottom Survey database, Reiss et al. 2010). The typical demersal fish species found at 50-100 m depth in the central North Sea include whiting (*Merlangius merlangus*), haddock (*Melanogrammus aeglefinus*), dab (*Limanda limanda*), long rough dab (*Hippoglossus platesoides*), plaice (*Pleuronectes platessa*) and grey gurnard (*Eutrigla gurnardus*). It should, however, be noted that the abundance of haddock is larger in the northern North Sea, compared to the central North Sea. Cod (*Gadus morhua*), lemon sole (*Microstomus kitt*) and sand eel (*Ammodytes/Hyperoplus* sp.) are also relatively common.

The basic biology of these species is described in Table 6-4, Table 6-5 and Table 6-6.

Table 6-4 Biology of demersal cod fish species that may be encountered at Hejre and South Arne.

| Species | Distribution and biology | References |
|--|--|--|
| Cod (<i>Gadus morhua</i>)  | <p>Cod may be encountered within the project area although the area is not a core area for cod. South Arne is situated in a spawning area for cod (Figure 6-15). The spawning season is from the beginning of January to May and peaking in January – February. After spawning, the eggs are found floating near the water surface over large areas. The eggs hatch within 2-3 weeks, depending on water temperature.</p> <p>The pelagic eggs drift with the prevailing east, northeast and north going currents to nursery areas for larvae, which are mainly found in German Bight, north of German Bight, Jutland Bank, Great- and Little Fishing Bank and along the Norwegian Trench into Skagerrak. These areas are characterised by the formation of hydrographical fronts with high concentrations of zooplankton on which the larvae feed.</p> | ICES 2019a, Sundby et al. 2017, Knutsen et al. 2004, Munk et al. 1999, Munk et al. 1995. |
| Haddock (<i>Melanogrammus aeglefinus</i>)  | <p>Haddock is widespread throughout the deeper waters of the temperate northern Atlantic, shoaling loosely at depths from around 40 to 300 m with a preference for depths between 75 and 125 m. In the North Sea the bulk of haddock is found in the northern parts. Haddock may be encountered at Hejre and South Arne, but the area is not a core area for the species. Spawning takes place, at depths of 100 to 150 m in the northern part of the North Sea. Spawning period is from February to May, with peak spawning in March – April. Eggs and larvae are pelagic.</p> | ICES 2019a, Sundby et al. 2017, Worsøe et al. 2002. |
| Whiting (<i>Merlangius merlangus</i>)  | <p>Whiting is widely distributed throughout the North Sea, Skagerrak and Kattegat. High densities of whiting are found along the UK east coast, the southern and central North Sea (except the Doggerbank) and Kattegat Skagerrak</p> <p>The spawning areas of whiting are wide ranging and are distributed over much of the North Sea from Viking Bank-Shetland in the North to the English Channel in the south. Neither Hejre nor South Arne is in a spawning area for whiting. However, as spawning areas for fish are not static and fixed delimited areas, it is very likely that whiting in fact spawns at these fields. Spawning takes place from March to June. Eggs and larvae are pelagic.</p> | ICES 2019a, Sundby et al. 2017. |

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Table 6-5 Biology of flatfish species that may be encountered at Hejre and South Arne

| Species | Distribution and biology | Reference |
|--|---|---|
| Plaice (<i>Pleuronectes platessa</i>)  | Plaice generally inhabits relatively soft substrata and are most abundant on water depths between 10 and 50 m. In the North Sea plaice is most abundant in the central and southern parts. Hejre and South Arne are situated in a plaice spawning area (Figure 6-16). Spawning takes place from December until March (peak: January and February). The pelagic eggs and larvae are transported by the currents, mainly in the eastern and north-eastern directions. During the transport larvae gradually metamorphose and obtain the typical flatfish form. The juveniles settle on the seabed in nursery areas in shallow inshore waters. The nursery areas in the Wadden Sea are of especially importance. | ICES 2019a, Sundby et al 2017 and Bromley 2000. |
| Dab (<i>Limanda limanda</i>)  | Dab is the most abundant flatfish species in the North Sea and is distributed over the whole of the North Sea in waters down to a depth of about 100 m. Dab spawn in the Central and Southern North Sea. As spawning areas for fish are not static and fixed delimited areas, it is likely that dab also spawns at these fields. The spawning takes place from April to June. | ICES 2019a, Sundby et al 2017. |
| Long rough dab (<i>Hippoglossus platessoides</i>)  | Long rough dab lives over clean, muddy and sandy bottoms usually at deeper waters. It is not of commercial value. Neither Hejre nor South Arne are located within the mapped spawning area for long rough dab. However, as spawning areas for fish are not static and fixed delimited areas, it is very likely that long rough dab in fact spawns at these fields. Spawning takes place from February to May (Peak: April). | ICES 2019a, Sundby et al 2017. |
| Lemon sole (<i>Microstomus kitt</i>)  | Lemon sole is a medium sized flatfish. It mostly occurs on rocky or sandy bottoms at depths between 20 to 150 m. Hejre and South Arne are situated in a spawning area for lemon sole (Figure 6-13). Spawning takes place from January to October. | References: ICES 2019a, Sundby et al 2017. |

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Table 6-6 Biology of sand eel and grey gurnard that may be encountered at Hejre and South Arne.

| Species | Distribution and biology | Reference |
|--|--|-------------------------|
| Sand eel (<i>Ammodytes/Hyperoplus</i> sp.)  | Four different species of sand eels are encountered in the North Sea. They are an important food source for many predatory species, including other fish, marine mammals and seabirds. Sand eels are burrowing species that spend most of their time in sandy sediments, although during the spring and summer they enter the water column to feed. The spawning areas are shown in Figure 6-17. This means that South Arne is within the spawning area of sand eel, while Hejre is just outside the major area of spawning. After hatching the juveniles, spend approximately 3-4 months in the plankton before settling on a suitable sandy substrate. | References: ICES 2019a. |
| Grey gurnard (<i>Eutrigla gurnardus</i>)  | Grey gurnard is one of the main demersal species in the North Sea. It occurs throughout the North Sea but there is a marked seasonal northwest-southeast migration pattern. During winter the population is concentrated in the central western North Sea to the northwest of the Dogger Bank at depths of 50-100 m. During spring there is a mass migration to the south-east. Spawning takes place in this area from April to August. The eggs are pelagic. | References: ICES 2019a. |

6.6.3 The state of fish stocks

Most of the commercially exploited North Sea stocks of the typical fish species encountered in the project area are in good condition and are fished at a sustainable level.

However, the cod stock in the North Sea is in a poor condition. Spawning stock biomass is below the sustainable level, and the fishing mortality is too high (Figure 6-15, Table 6-7).

Table 6-7 State of the North Sea stocks of the commercially exploited typical fish species encountered in the Hejre tie-back to the South Arne area.

| Species | State of stock |
|----------|---|
| Herring | The North Sea autumn-spawning herring stock is not in a collapse situation, its productivity and recruitment are weak, and fishing pressure relative to the revised sustainable target is still above ideal levels. Therefore significant reductions in catch advice for 2026 are advised to support longer-term rebuilding and sustainability (ICES, Herring Assessment Working Group for the Area South of 62° North (HAWG), 2025) |
| Sprat | The spawning stock of sprat has full reproductive capacity (ICES, 2019c) |
| Mackerel | Mackerel stock (NE Atlantic including North Sea component) is in poor condition relative to sustainable reference points (biomass below MSY/Bpa/Blim and fishing pressure high). ICES recommends a substantial reduction in catches in 2026 under the MSY approach to improve the likelihood of recovery (ICES, 2025) |
| Cod | The cod stock in the North Sea is in a poor condition. However, the state of the stock is gradually improving. Spawning stock biomass has increased from the historic low in 2006 but is still below sustainable level and the fishing mortality is still too high (ICES 2019e). |
| Haddock | The condition of the haddock stock is good. Spawning stock biomass has full reproductive capacity, and the stock is harvested sustainably ICES (2019f) |
| Whiting | The condition of the whiting stock is good. Spawning stock biomass has full reproductive capacity, and the stock is harvested sustainably ICES (2019g) |

| | |
|----------|--|
| Plaice | The plaice stock is in excellent condition. The spawning stock biomass is at a record high and has increased almost fivefold during the last 15 years. The stock is harvested in a sustainable manner (ICES 2019h). |
| Dab | Sustainable levels for dab have not been defined. The ICES assessment of the dab stock is indicative only. The spawning stock biomass has been increasing since 2006 and total mortality has decreased since 2009. ICES (2019i). |
| Sand eel | The condition of the sand eel stock is good (Ministry of Environment and Food 2019). However, the spawning stock biomass has a reduced reproductive capacity (ICES 2019j). |

6.6.4 Fish spawning at Hejre and South Arne

There are two main ways fish spawn: demersal and pelagic spawning. Demersal spawners lay their eggs on the seabed, pelagic spawners lay their eggs in the free water masses where they remain free flowing for fertilization.

Cod, plaice, dab, long rough dab, lemon sole, mackerel and whiting are pelagic spawners. All are encountered at Hejre and South Arne (Sundby et al. 2017, Warnar et al. 2012). Sand eel is demersal spawner (lay egg on the seabed) and is dependent on sandbanks. However, sand eel banks are not identified in the Hejre and South Arne area (Figure 6-17).

The locations of spawning areas in the North Sea for lemon sole, mackerel, cod and plaice are shown in Figure 6-13, Figure 6-14, Figure 6-15 and Figure 6-16. Hejre and South Arne are located inside the spawning area for lemon sole Figure 6-13 and Hejre at the border of a spawning area for mackerel while South Arne is located within a spawning area for mackerel (Figure 6-14), and close to spawning areas for cod (Figure 6-15) and plaice (Figure 6-16). Spawning areas for sprat, long rough dab and whiting are not static and fixed delimited areas, therefore although the species appear to spawn outside the areas where Hejre and South Arne are located, these species may spawn at Hejre and South Arne.

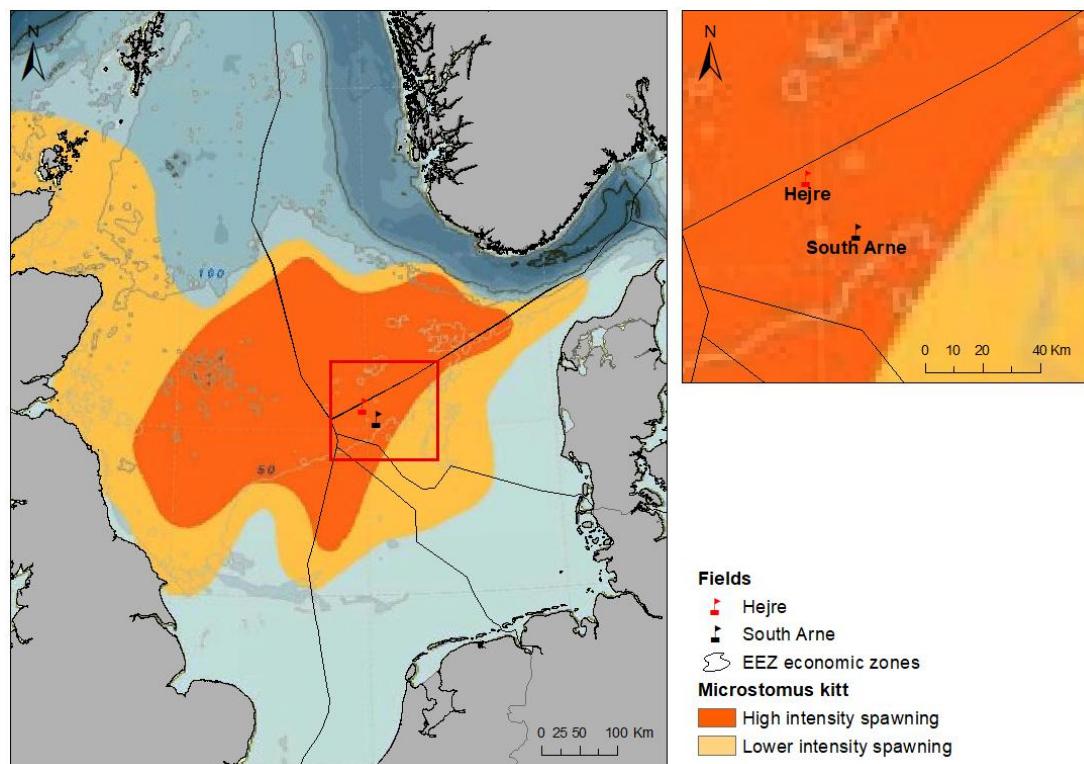


Figure 6-13 Spawning areas for lemon sole (*Microstomus kitt*) in the North Sea. The blue areas indicate the bathymetry. (Based on Sundby et al 2017).

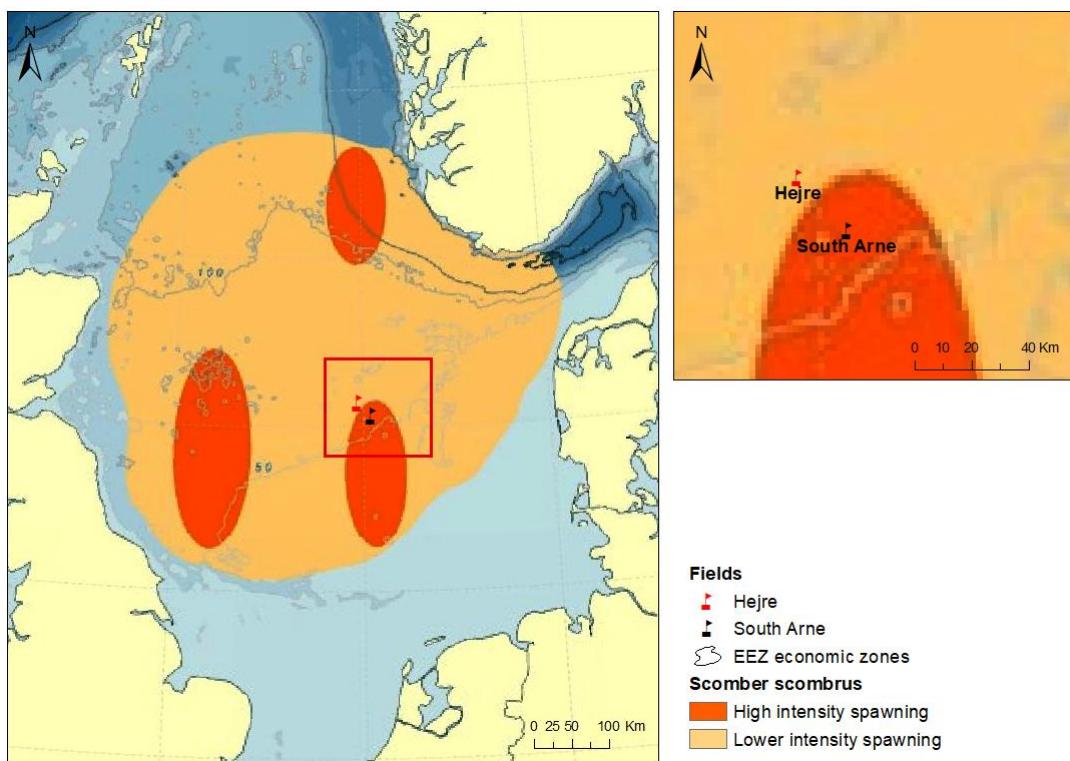


Figure 6-14 Spawning areas for mackerel (*Scomber scombrus*) in the North Sea (Based on Sundby et al. 2017). The blue areas indicate the bathymetry.

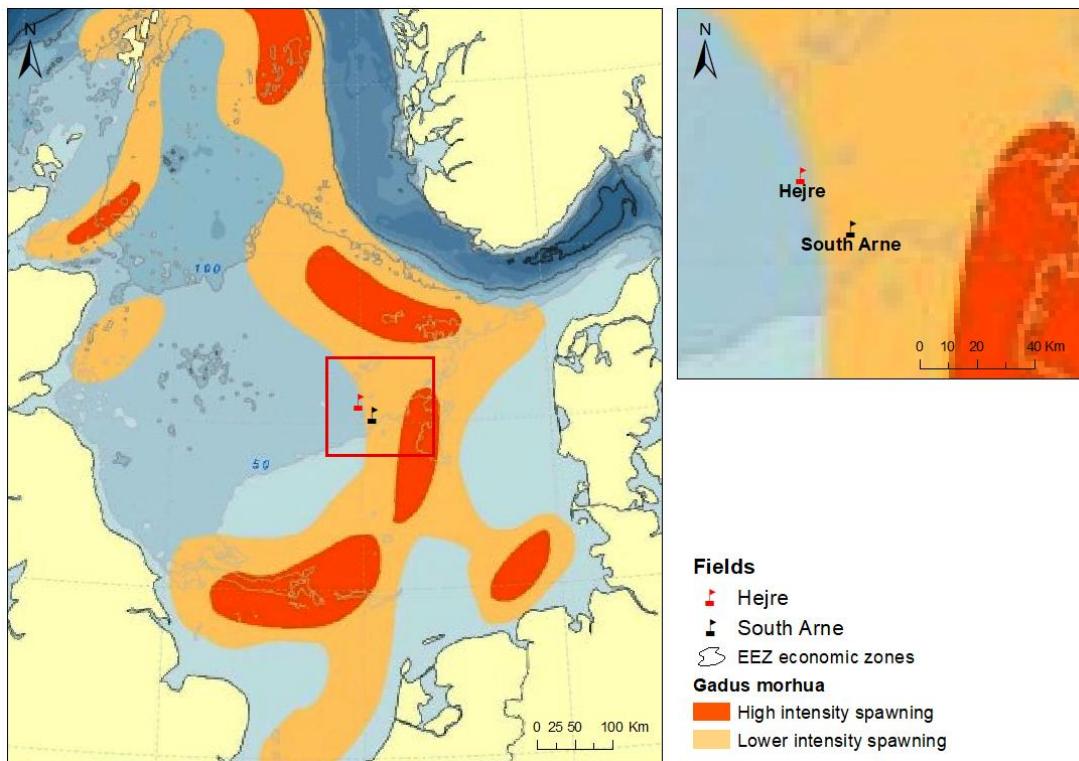


Figure 6-15 Spawning areas for cod in the North Sea. The blue areas indicate the bathymetry. Based on Sundby et al. 2017.

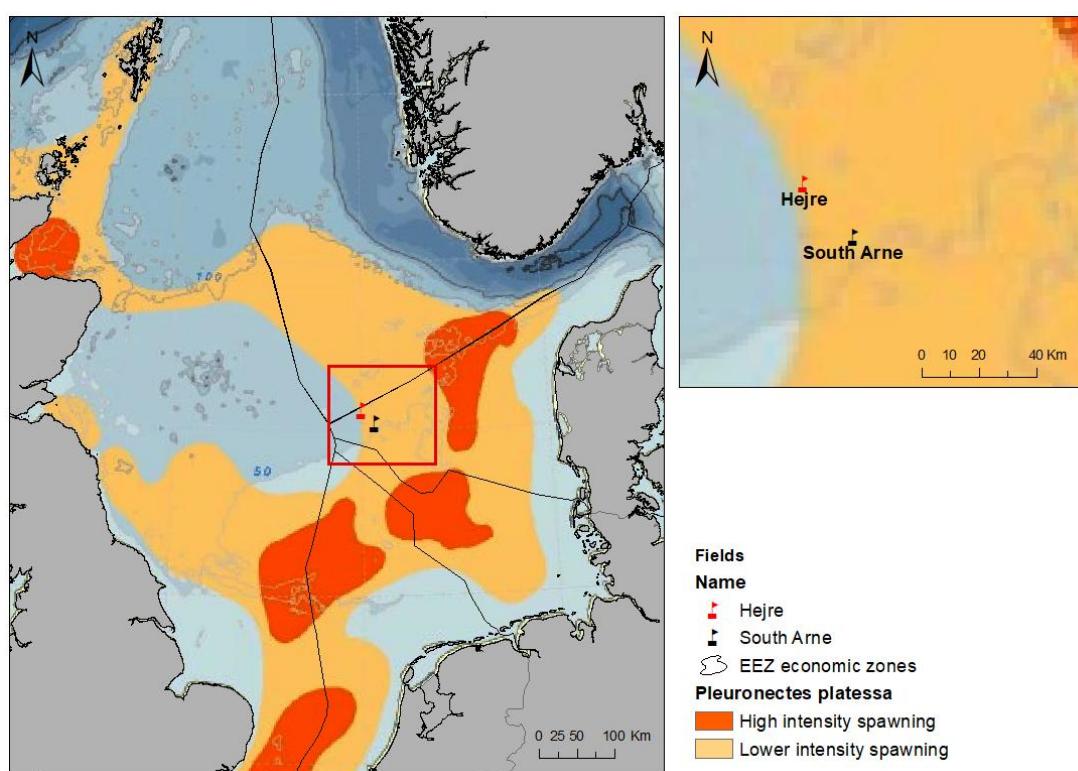


Figure 6-16 Spawning areas for plaice (*Pleuronectes platessa*) in the North Sea. The blue areas indicate the bathymetry. (Based on Sundby et al. 2017)

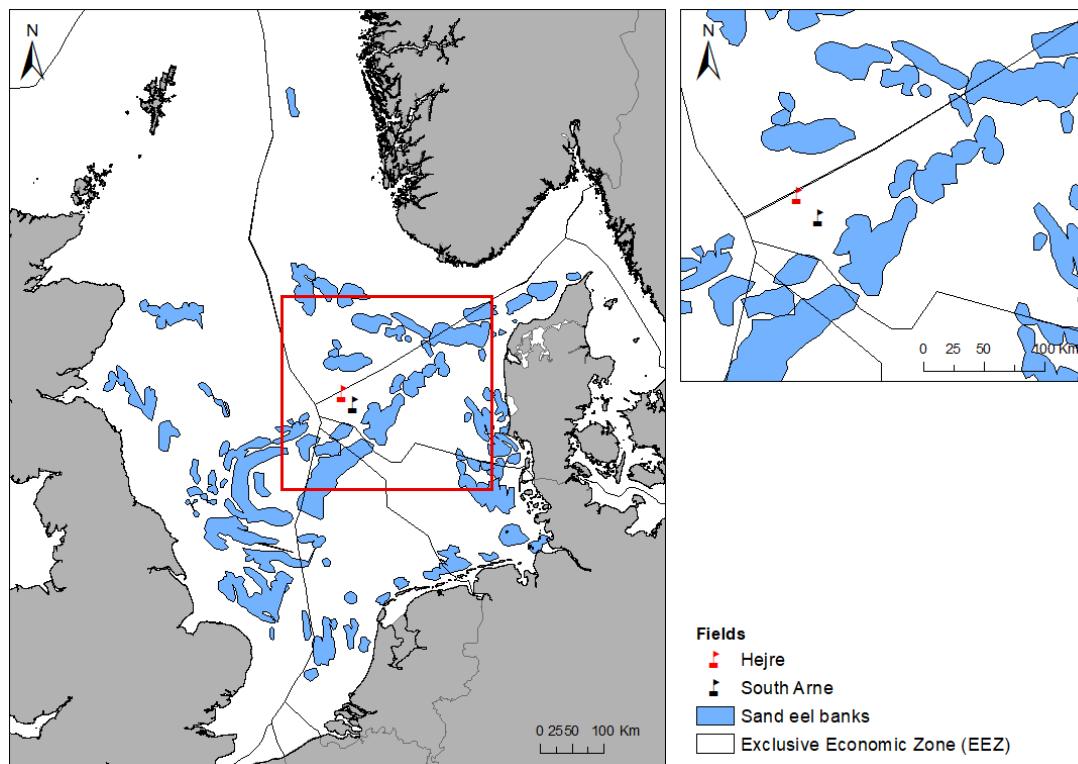


Figure 6-17 Spawning areas (banks) for sand eel (*Ammodytes spp.*) in the North Sea. (van Deurs 2019).

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The spawning seasons for the species that are likely to spawn are shown in Table 6-8. It is seen that most spawning takes place during winter, spring and early summer.

Table 6-8 Spawning seasons for fish that may spawn at Hejre and South Arne (Sundby et al. 2017). Light grey: Total spawning period. Dark grey: Peak spawning.

| Species | Jan | Feb | Mar | Apr | May | Jun | Jul | Aug | Sep | Oct | Nov | Dec |
|----------------|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|-----|
| Cod | | | | | | | | | | | | |
| Whiting | | | | | | | | | | | | |
| Plaice | | | | | | | | | | | | |
| Dab | | | | | | | | | | | | |
| Long rough dab | | | | | | | | | | | | |
| Lemon sole | | | | | | | | | | | | |
| Mackerel | | | | | | | | | | | | |
| Sand eel | | | | | | | | | | | | |

Eggs and larvae are carried with the prevailing east, north-east and north going currents to the front areas close to the coasts of the eastern North Sea and Skagerrak, where they can benefit from the high plankton production at the hydrographical fronts. Several field surveys have demonstrated that high concentrations of larvae of cod, whiting and sand eel are encountered in the front areas of Skagerrak and north-eastern North Sea south of Norway. Other surveys have shown that the front area along the Danish west coast and in the German Bight houses large concentrations of larvae of sand eel, plaice, cod and whiting (Knutsen et al. 2004, Munk et al 2002, Munk et al. 1999, Munk et al 1995).

6.6.5 European sturgeon (*Acipenser sturio*)

The European sturgeon is listed in appendix II and IV of the Habitats Directive (Directive 92/43/EEC). The European sturgeon is an anadromous migrating species that used to breed in larger European rivers. It used to be a regular guest in Danish Waters but has never been known to breed in Danish rivers. When it was more common (up to the middle of the 19th century) the catches were of very large individuals up to 200 kg. However, the sturgeon was over-fished in all European Waters, and its riverine habitat was destroyed by damming or extraction of sea bed, and since the late 19th century, catches have been very rare and of very small individuals, even down to 1.5 kg.

In marine environments, young individuals (2-7 years) typically first inhabit estuaries, and the juveniles later carry out long distance migrations in marine waters to feed over several years until they become adult sturgeons (10-16 years old, depending on sex and latitude). Hereafter mature fish return to their natal river to reproduce. Once the eggs are laid, the adult sturgeons swim back to sea in a few days' time (Visser et al. 2020 and Gessner et al. 2023). At sea and in estuaries it feeds on benthic organisms (Møller & Carl, 2019). The historical catch records show occurrences across most regions (Figure 6-18), with the highest catch numbers found along the coastal areas of the North Sea and Skagerrak (Møller & Carl, 2019).

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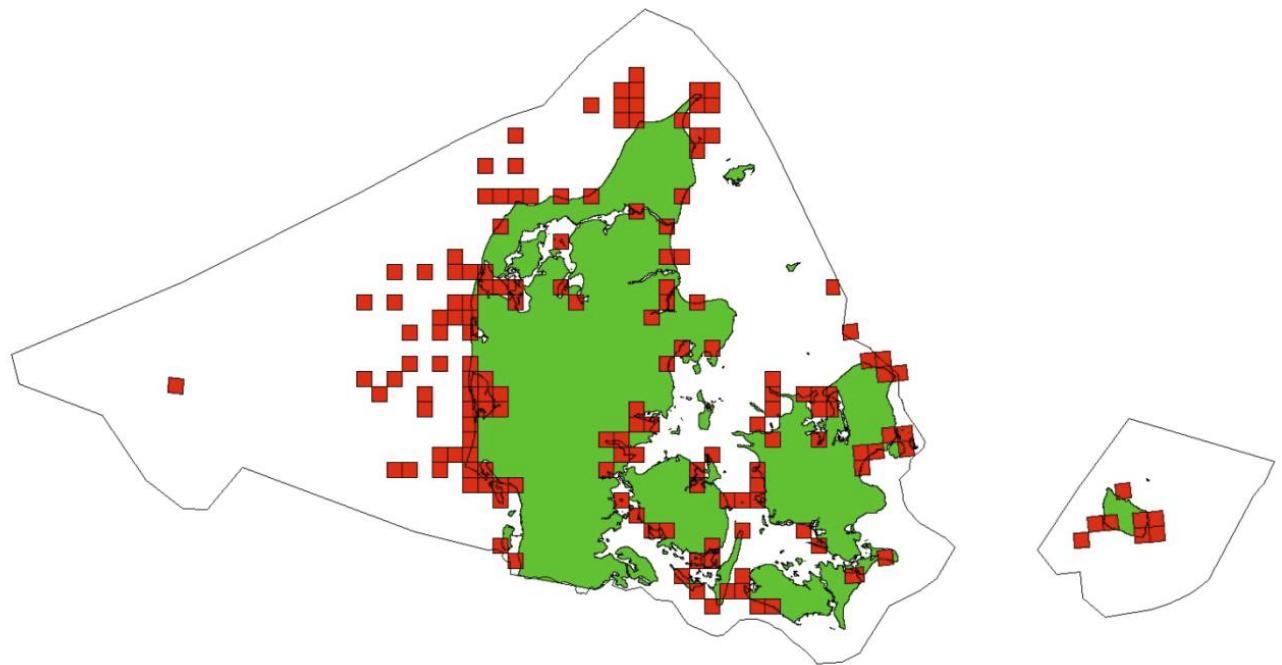


Figure 6-18. Distribution of historical catches of European Sturgeon in Danish Waters. Copied from Møller & Carl, 2019).

In 2007, a release program for European sturgeon was initiated in the German river Elbe and in French rivers, where it used to breed. Since then, stray individuals have begun appearing in Danish marine waters in catches. The released sturgeons were tagged, and data indicates that several of the sturgeons caught originated from the river Elbe. The rising number of records in the North Sea is therefore believed to be linked to this reintroduction effort, but the species has not yet been found to naturally breed, perhaps because the released individuals are not yet sexually mature. Because the species is very rare and perhaps mostly costal, there is little chance to find it near the project area. The species only breed in rivers.

6.7 Birds

The North Sea is an important area for seabirds. This is primarily caused by the high productive hydrographical front areas which are important feeding areas for birds. It is estimated that more than 10 million birds make use of the North Sea for breeding, feeding, or migratory stopovers every year. Furthermore, important breeding colonies fringe the coastlines (Skov et al. 1995). The Hejre and South Arne fields are both far from important bird areas (Figure 6-19).

The important bird areas in the North Sea coincide with the highly productive areas where hydrographic fronts can be formed, producing an abundance of food for seabirds (Figure 6-19).

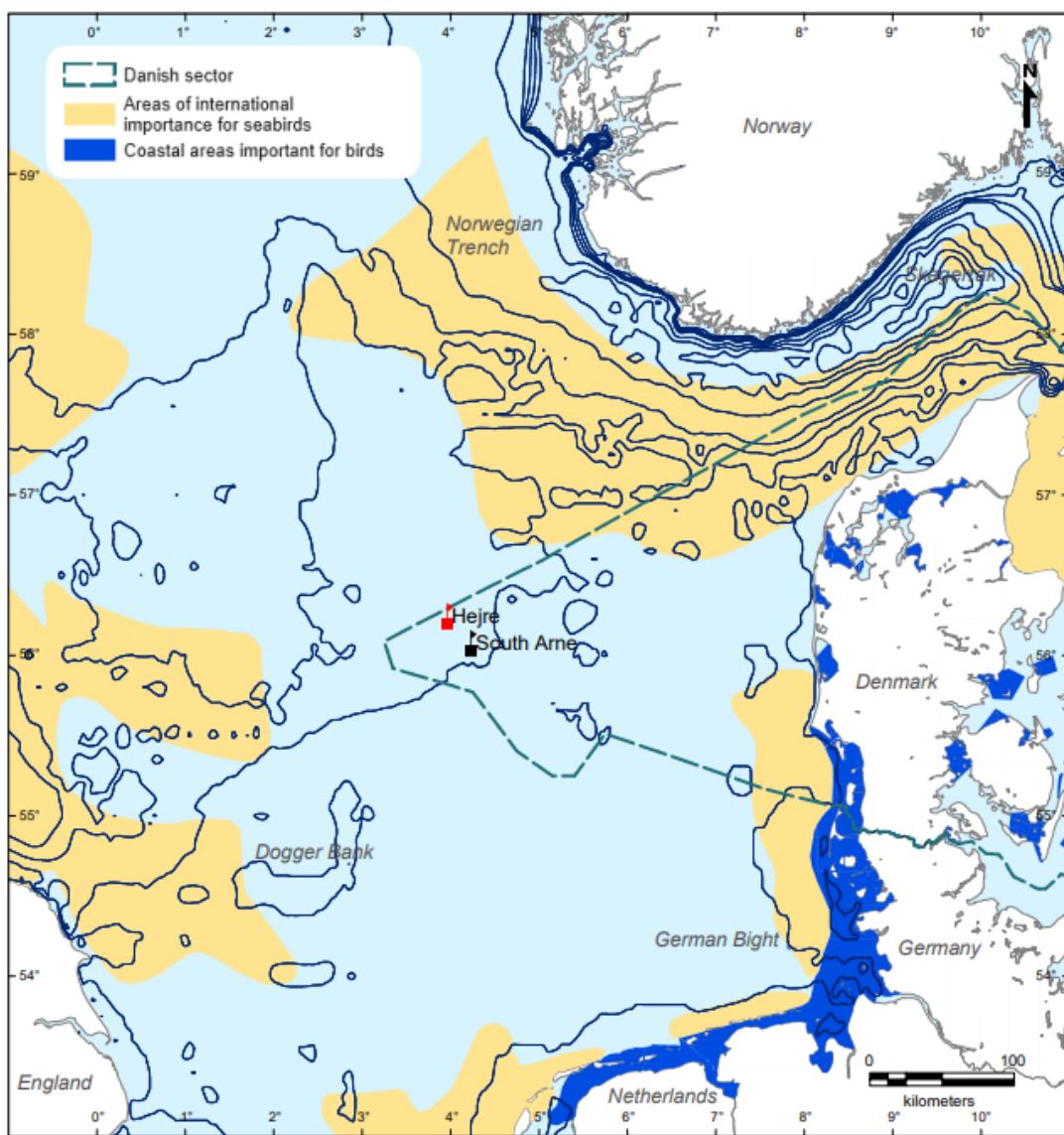


Figure 6-19 Areas of international importance for seabirds (light brown shading) and coastal areas important for birds (blue shading). (Data: Skov et al. 1995, Falk & Brøgger Jensen 1995).

6.7.1 Seabirds at Hejre and South Arne

During winter some seabirds may be encountered at Hejre and South Arne since these species are distributed over the entire North Sea during winter. The predominant species are fulmar (*Fulmarus glacialis*) and kittiwake (*Rissa tridactyla*) (Figure 6-20 and Figure 6-21). Additionally, Gannet (*Sula bassanoides*), razorbill (*Alca torda*) and common guillemot (*Uria aalge*) occur in low densities (Appendix C, Environmental Atlas). These species are mainly associated with cliffs and offshore islands and only occur in the open sea outside

the breeding season. They occur in larger densities in other areas of the North Sea with more favourable feeding opportunities than the central parts (COWI 2006, Skov et al., 1995). The biology of these species is described in Table 6-9.

Table 6-9 Biology of birds that may be encountered at Hejre and South Arne during winter (Source: Birdlife International 2014). Images from www.rspb.org

| Species | Biology |
|---|--|
| Fulmar (<i>Fulmarus glacialis</i>)  | The fulmar typically breeds on cliffs and rock faces, occasionally on flatter ground and up to 1km inland, nesting within colonies on narrow ledges or in hollows. The most important breeding colonies in the North Sea are found in Scotland, the Orkneys, and the Shetlands and at Flamborough head. Fulmars have a potentially large offshore foraging range from their colonies, as birds regularly depart for more than 4-5 days on foraging trips, both before egg-laying and during incubation. Fulmars prey on a wide variety of fish such as, sand eels, sprat, and small gadoids. Large zooplankton species (especially amphipods and copepods) and squid are also important food items. They will also scavenge offal including fishery waste, entrails, and whole fish discarded by fishing vessels. |
| Kittiwake (<i>Rissa tridactyla</i>)  | The kittiwake breeds from mid-May to mid-June in very large single- or mixed-species colonies. The most important breeding colonies in the North Sea are found in Scotland, the Orkneys, Shetlands and at Flamborough head. The kittiwake nest on high, steep coastal cliffs with narrow ledges. The nest is a compacted mass of mud, grass and feathers. During the breeding season, it generally feeds within 50 km of the breeding colony. After breeding, it disperses from coastal areas to the open ocean. The species begins to disperse from the breeding colonies between July and August, often moulting in large flocks of several thousand individuals on beaches between the breeding grounds and the open sea. During the winter, the species is highly pelagic, usually remaining on the wing out of sight of land. Its diet mainly consists of small pelagic shoaling fish such as sand eel, sprat and young herring, but squid shrimps or other invertebrates may also be included in the diet. |
| Gannet (<i>Sula bassanus</i>)  | The gannet is strictly marine, with movements largely confined to the continental shelf. Individuals nest on cliffs and offshore islands and occasionally on the mainland. Its diet consists primarily of shoaling pelagic fish, mostly caught by plunge diving. Birds can also be seen attending trawlers in large numbers. This is a ground nesting species, usually within large colonies. The nest is built with seaweed, grass and earth stuck together with excreta. |
| Guillemot (<i>Uria aalge</i>)  | The guillemot breeds in colonies primarily on steep cliff faces or low, flat islands. The most important breeding colonies in the North Sea are found in Scotland, the Orkneys, Shetlands and at Flamborough head. It does not construct a nest but lays on broad or narrow cliff ledges and low, flat islands. Individuals mostly occur offshore during winter usually within the breeding range, but the species may be encountered in low to moderate density all over the North Sea. Most individuals return to the colony in March-April. Its diet consists mostly of schooling pelagic fish, mostly sand eel, herring and sprat with small gadoids important at some colonies. Crustaceans can also be the dominant food source. The food is usually obtained within 10-20 km of the colony (Bird Life International 2014) |

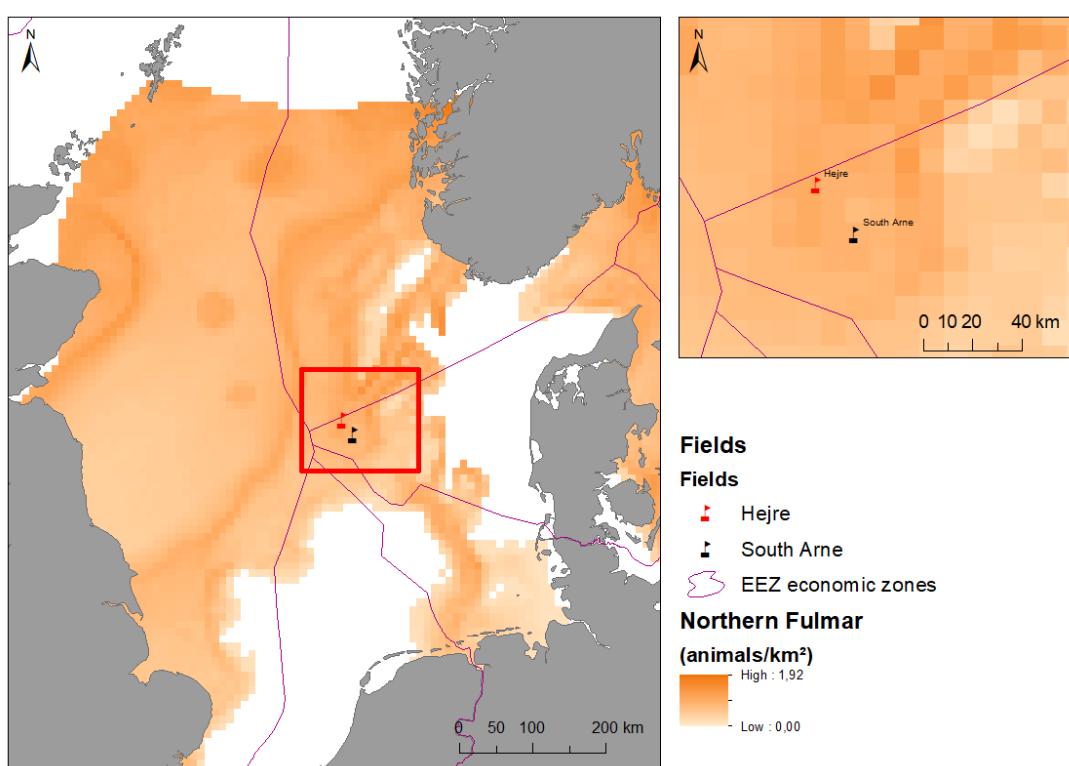


Figure 6-20 Relative abundance of Northern Fulmar (*Fulmarus glacialis*) in the North Sea (Waggit et al. 2019).

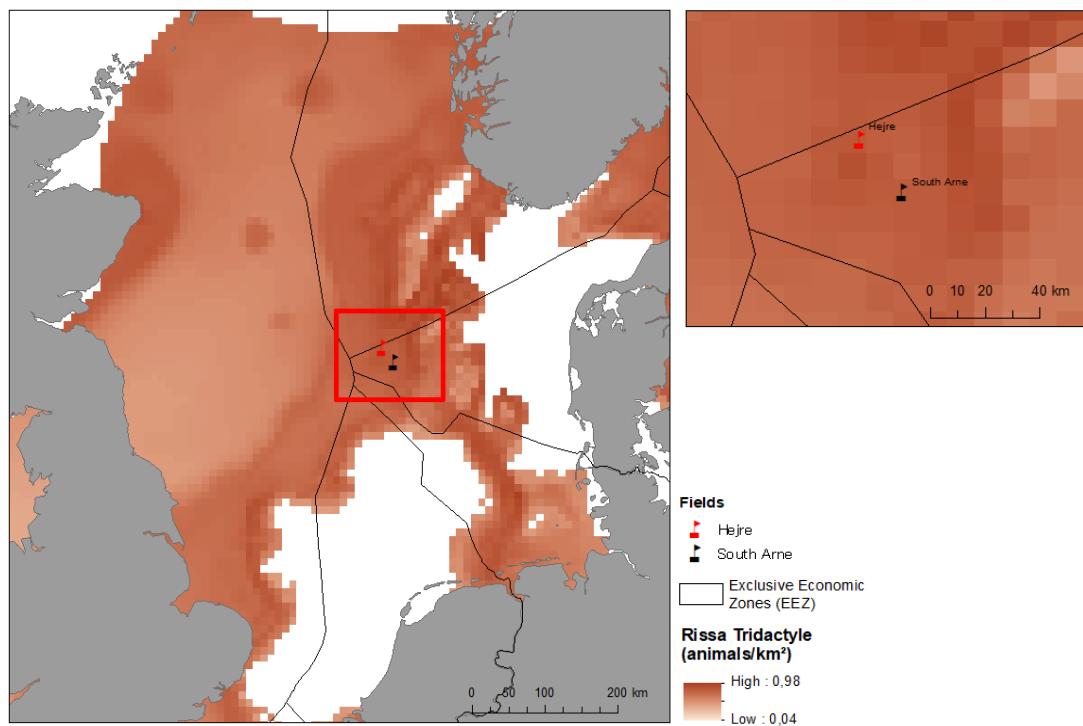


Figure 6-21 Relative abundance of Kittiwake (*Rissa tridactyla*) in the North Sea (Waggit et al. 2019).

6.7.2 Migrating land birds

Large numbers of land birds migrate across the North Sea between the UK and Western Europe including waders and species of thrushes, chats, warblers and finches (Baptist 2000, Lack 1959, 1960, 1963). Several of these species may sporadically be encountered at Hejre and South Arne.

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6.8 Marine mammals

6.8.1 Seals

Grey seals (*Halichoerus grypus*) and Harbour seals (*Phoca vitulina*) may occasionally be sighted in the project area, although the area is not a core area for these species (Tougaard 2007 and Tougaard et al. 2003). Their basic biology is described in Table 6-10.

Harbour seal is included in the basis for the designation of the German, Dutch and UK Nature 2000 areas DE 1003-301 Doggerbank, NL 2008-001 Doggerbank and UK0030352 Dogger Bank. Grey seal is also listed in the basis for the designation of DE 1003-301 Doggerbank, NL 2008-001 Doggerbank and UK0030352 Dogger Bank areas (see section 7.5.1 below).

Table 6-10 Biology of seal species that may be encountered at Hejre and South Arne.

| Species | Biology |
|--|--|
| Harbour seal (<i>Phoca vitulina</i>)  | <p>Harbour seal (<i>Phoca vitulina</i>) is the only seal species that is observed regularly in the Danish sector of the central part of the North Sea. Harbour seals are primarily coastal, depending on isolated and undisturbed land areas for resting, breeding and moulting (such as undisturbed islands, islets sandy beaches, reefs, skerries and sandbanks). They are gregarious animals and when not actively feeding, they will haul onto a terrestrial resting site.</p> <p>The harbour seal does not generally venture more than 20 kilometres offshore. However, radio-tagging experiments using satellite tracing have indicated that harbour seals may undertake foraging migrations far out into the North Sea from their core areas along the coast (Tougaard et al. 2003, Tougaard 2007). They are known to prey primarily on fish such as herring, mackerel, cod, whiting and flatfish, and occasionally upon shrimp, crabs, molluscs and squid. Females give birth once a year, with a gestation period of approximately nine months. Harbour seal breed in large numbers in the Wadden Sea. It is less common along the British coast.</p> |
| Grey seal (<i>Halichoerus grypus</i>)  | <p>The grey seal (<i>Halichoerus grypus</i>) breeds in several colonies on islands on the east coasts of Great Britain. Notably large colonies are at Donna Nook (Lincolnshire), the Farne Islands off the Northumberland Coast Orkney and North Rona off the north coast of Scotland. In the German Bight, colonies exist off the islands Sylt and Amrum and on Helgoland. The pups are born in the period September-November. Within a month or so, they shed the pup fur and grow the dense waterproof adult fur and soon leave for the sea to learn to fish for themselves.</p> <p>Tagging experiments have indicated that grey seals breeding in Great Britain migrate long distances into the North Sea from their breeding colonies (McConnell et al. 1999) but they have not actually been observed in the offshore parts of the Danish sector of the North Sea (Tougaard 2007). The grey seal feeds on a wide variety of fish including sand eels, cod and other gadoids, flatfish, herring and skates. They may also take octopus and lobster.</p> |

6.8.2 Cetaceans (Annex IV species)

All species of cetaceans (whales, dolphins and porpoise) are listed in Annex IV in the Habitats Directive and are therefore strictly protected. In addition, harbour porpoises are included in the basis for the designation of the German, Dutch and UK Nature 2000 areas DE 1003-301 Doggerbank and NL 2008-001 Doggerbank, UK0030352 Doggerbank.

A total of 23 different species of cetaceans has been observed in the North Sea. Only harbour porpoise (*Phocoena phocoena*), white-beaked dolphin (*Lagenorhynchus albirostris*) and minke whale (*Balaenoptera acutorostrata*) are encountered regularly in the western part of the Danish sector of the North Sea (Sveegaard et al. 2018, SCANS II, Kinze 2007, Reid et al. 2003). The biology of the three cetacean species

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is briefly described in Table 6-11. Other cetacean species are rare and do only occasionally migrate into in the North Sea from the Atlantic. This is consistent with the species assessed to be relevant for assessment of impulsive noise sources in Danish waters (DCE, 2021).

The population characteristics of harbour porpoises is described in more detail below.

Table 6-11 Biology of species of cetaceans that may be encountered at the Hejre and South Arne area.

| Species | Biology |
|---|---|
| Harbour porpoise (<i>Phocoena phocoena</i>)  | <p>The harbour porpoise (<i>Phocoena phocoena</i>) is the most abundant whale species in the North Sea and occur regularly in the Hejre tie-back to South Arne development area. The population in the North Sea has been estimated to 300.000-350.000 (Sveegaard et al. 2018, Gilles et al. 2016).</p> <p>Harbour porpoises feed mostly on fish such as cod, whiting, mackerel, herring and sprat. Harbour porpoises tend to be solitary foragers, but they do sometimes hunt in packs. The mating season is July-August. The gestation period typically lasts 10–11 months and most births occur in late spring and summer. Calves are weaned after 8–12 months.</p> |
| White-beaked dolphin (<i>Lagenorhynchus albirostris</i>)  | <p>White beaked dolphin (<i>Lagenorhynchus albirostris</i>) is relatively common in the northern part of the North Sea and may be encountered in the Hejre tie-back to South Arne development area (Geelhoed et al 2014, Hammond et al 2013, Reid, et al. 2003). White beaked dolphin is much less abundant than harbour porpoise. The total population in the North Sea is only about 16,500 individuals (Hammond et al. 2013).</p> <p>White-beaked dolphins are acrobatic and social animals that are typically found in pods of 4-6 animals. They will frequently ride on the bow wave of fast-moving vessels and jump clear of the sea's surface. White beaked dolphin mates from May to August and the delivery occur the following summer after a gestation period of 11 months. They primarily feed on fish such as herring, cod, haddock, whiting and hake but may also prey on squid, octopus and benthic crustaceans.</p> |
| Minke whale (<i>Balaenoptera acutorostrata</i>)  | <p>Minke whale (<i>Balaenoptera acutorostrata</i>) may be observed at the Hejre tie-back to South Arne development area (Geelhoed et al. 2014, Hammond et al. 2013, Kinze 2007, Reid et al. 2003). Minke whale is the only species of baleen whale that occurs regularly in the North Sea. The population in the North Sea has been estimated to about 19.000 individuals (Hammond et al. 2013).</p> <p>Mating and delivery take place from late winter to early spring. The female minke whale gives birth to a calf every year or every second year. The gestation period is 10 months and nursing of the calf takes place for 3-6 months. Minke whales primarily feed on pelagic fish such as herring and sprat and small crustaceans.</p> |

6.8.3 Harbour porpoises

The harbour porpoise is the most abundant whale species in the North Sea. It is regularly encountered in the waters around Hejre and South Arne although the areas are not a core area for the species. Harbour porpoises in the project area belong to the North Sea population. Through its migration and feeding pattern the species reaches into the Northern Kattegat and Skagerrak. The North Sea population has been estimated during international projects called SCANS (Small Cetacean Abundance in the North Sea) which took place in the period 1995 to 2016 (a total of three SCANS). The population was estimated to include 300.000 to 350.000 individuals indicating a stable population (Sveegaard et al. 2018).

Waggit et al. (2019) has modelled the distribution of harbour porpoises in the North Sea. The model shows that harbour porpoise is concentrated in the most Eastern part of the North Sea during winter and distributed over a larger area during summer Figure 6-22. The most important area for harbour porpoise in the North Sea is the waters between the western part of the Dogger Bank and the UK. The waters along the Danish, German and Dutch coasts, especially the German Bight/Horns Rev areas, are also important

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(Waggit et al. 2019, Gilles et al. 2016 and Sveegaard et al. 2018). It appears from the model that the Hejre and South Arne area are located within an area of some importance for harbour porpoises.

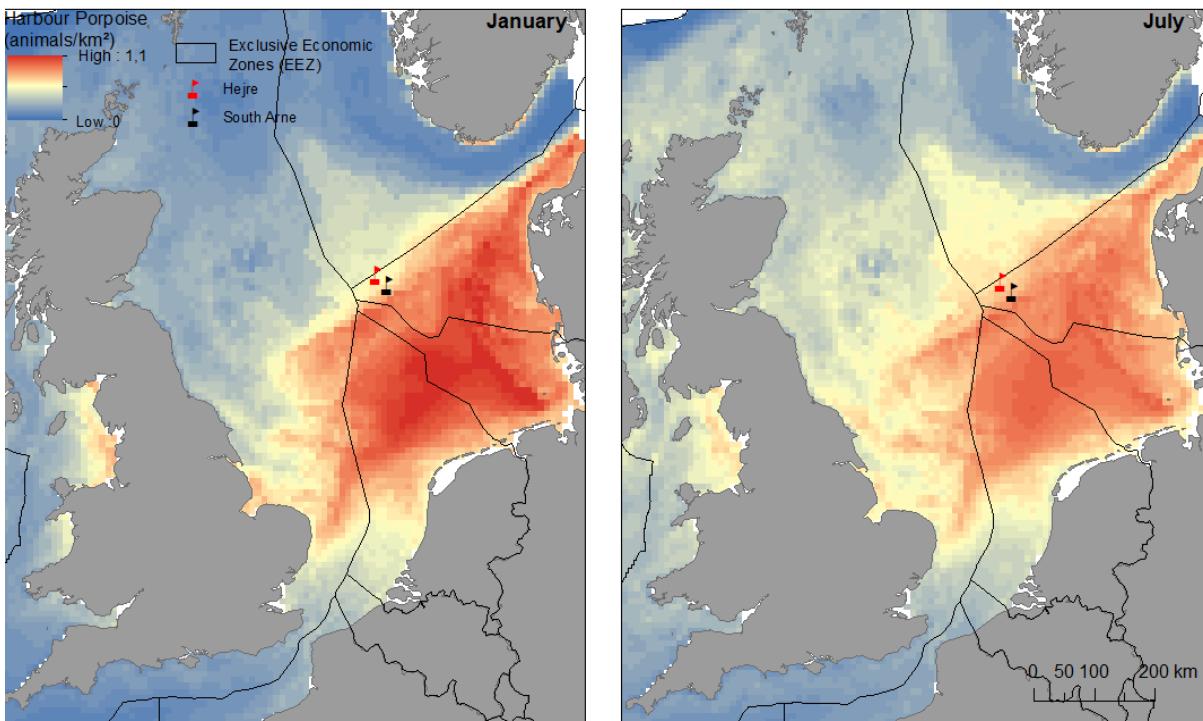


Figure 6-22 Distribution of harbour porpoise (*Phocoena phocoena*) in the North Sea Waggit et al. 2019).

6.9 Protected areas

6.9.1 Natura 2000 and annex IV species

The EU Habitats Directive (Council Directive 92/43/EEC of 21 May 1992) specifies natural habitats and wild fauna and flora for which the member states must ensure protection. The species and nature habitats to be protected are specified in the Annexes of the directive:

- Annexes I and II to the Directive contain the types of habitats (Annex I) and species (Annex II) whose conservation requires the designation of Special Areas of Conservation (SACs). For birds, Special Protected Areas (SPAs) are designated. Together Sacs and SPAs make up Natura 2000 areas.
- Annex IV lists species of animals and plants in need of particularly strict protection. Of the marine mammals encountered in the North Sea, all species of cetaceans are listed in Annex IV. The European sturgeon is also listed in appendix IV.

6.9.2 Valuable and vulnerable areas (SVO-areas)

Valuable and vulnerable areas (SVO-areas) is the management framework for marine protected areas in Norway. The SVO-areas include protected areas for red listed species and bird protection areas such as RAMSAR-sites (international conservation of wetlands). The SVO-areas have integrated management plans with criteria for protection.

6.9.3 RAMSAR

RAMSAR sites are designated through the RAMSAR convention. It is an intergovernmental treaty that provides the framework for national action and international management of wetlands. RAMSAR sites are of importance for birds. In Denmark they overlap with SPA (Natura 2000-areas) for birds.

6.9.4 Identified protected areas

6.9.5 Natura 2000

Hejre and South Arne are situated far from Danish designated Natura 2000 areas. However, around 49 km south of the field is a German designated Natura 2000 area: DE 1003-301 *Doggerbank*. As an extension of this area is the Dutch NL 2008-001 *Doggerbank* and the UK0030352 *Dogger Bank* in the UK sector (Figure 6-23).

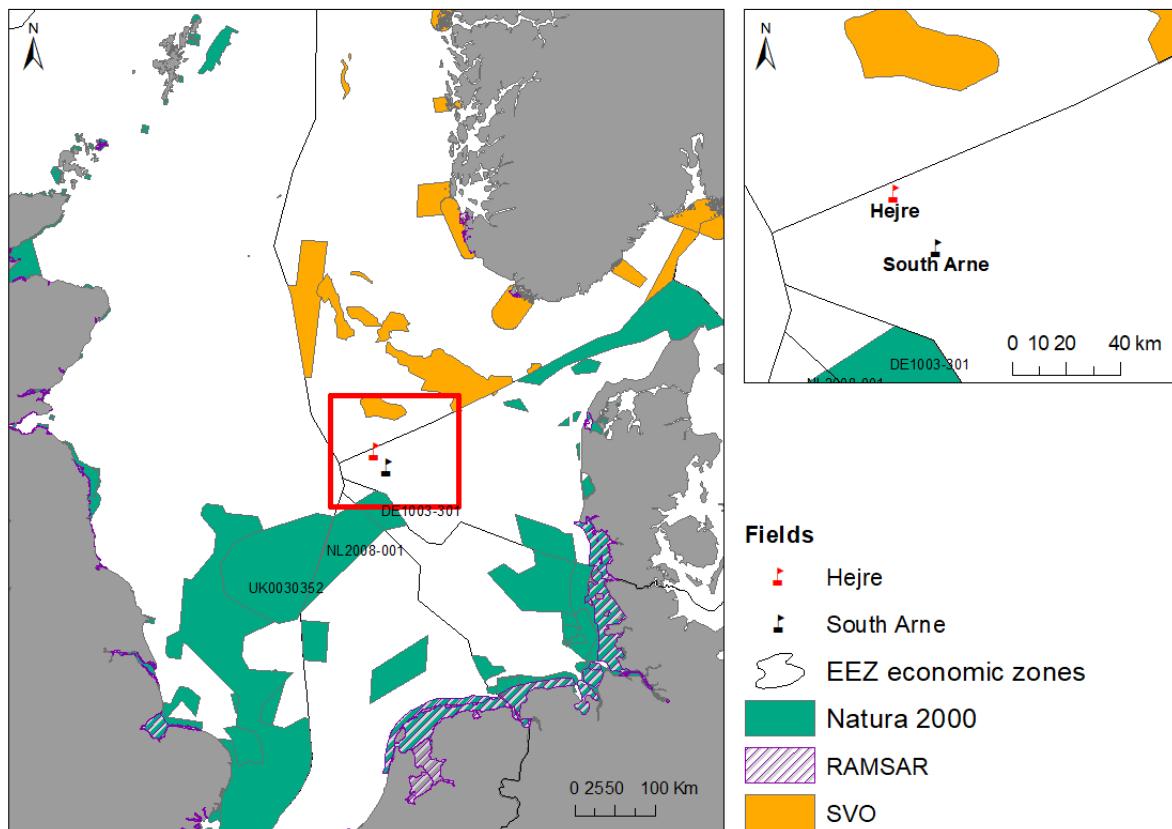


Figure 6-23 Location of Natura 2000-areas (SAC) in the North Sea.

The basis for the designation of these three SACs is listed in Table 6-12:

Table 6-12 Basis for the designation of the closest Natura 2000 areas.

| Natura 2000 areas (SACs) | Basis for the designation |
|--------------------------|--|
| DE 1003-301 Doggerbank | Annex I habitat type 1110 Sandbanks which are slightly covered by sea water all the time Annex II species 1351 Harbour porpoise and 1365 Harbour seal. |
| NL 2008-001 Doggerbank | Annex I habitat type 1110 Sandbanks which are slightly covered by sea water all the time Annex II species 1351 Harbour porpoise, 1365 Harbour seal and 1364 Grey seal |
| UK0030352 Doggerbank | Annex I habitat type 1110 Sandbanks which are slightly covered by sea water all the time Annex II species 1351 Harbour porpoise, 1365 Harbour seal and 1364 Grey seal |

6.9.6 Valuable and vulnerable areas (SVO-areas)

The closest SVO's in the Norwegian sector of the North Sea include the Sand eel field North (Vikingebanken) and South (Table 6-13). The Sand eel field North and South are designated as SVO to protect valuable spawning areas for sand eel. The SVO is located ca. 69 km from South Arne and 44 km from Hejre.

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The area is also designated to protect the two seabird species common guillemot (*Uria aalge*) and northern fulmar (*Fulmaris glacialis*).

Northwest of the Sand eel field South is the Mackerel field SVO, designated as important spawning area for mackerel. There are existing oil and gas activities in the SVO. The basis for the designation of the Sand eel fields SVO and the Mackerel field SVO area listed in Table 6-13.

Table 6-13 Basis for the designation of the closest SVO areas.

| SVO | Basis for the designation |
|---|---|
| Sand eel field north (Vikingebanken) and sand eel field south | The sand eel fields north and south are spawning and foraging area for eel. Furthermore, the sand eel fields are a valuable habitat for common guillemot (<i>Uria aalge</i>) and northern fulmar (<i>Fulmaris glacialis</i>) from April to December. Common guillemot overwinters in the North-western part of the area from December to March. |
| Mackerel field (Makrellfeltet) | The SVO is a spawning area for mackerel from May to July. The mackerel is monitored in the area through the international mackerel cruise (IESSNS) |

6.9.7 Protected areas under the Marine Strategy Framework Directive (MSFD)

Eight protected areas under the Marine Strategy Framework Directive have been designated in the North Sea. The closest area H is located in the far western part of the Danish EEZ, that is immediately west of Hejre and South Arne (Figure 6-24). The second closest area G is located to the north-east of Hejre and South Arne. This protection regulates activities within the area itself but not activities outside the protected area (Ministry of Environment 2021).

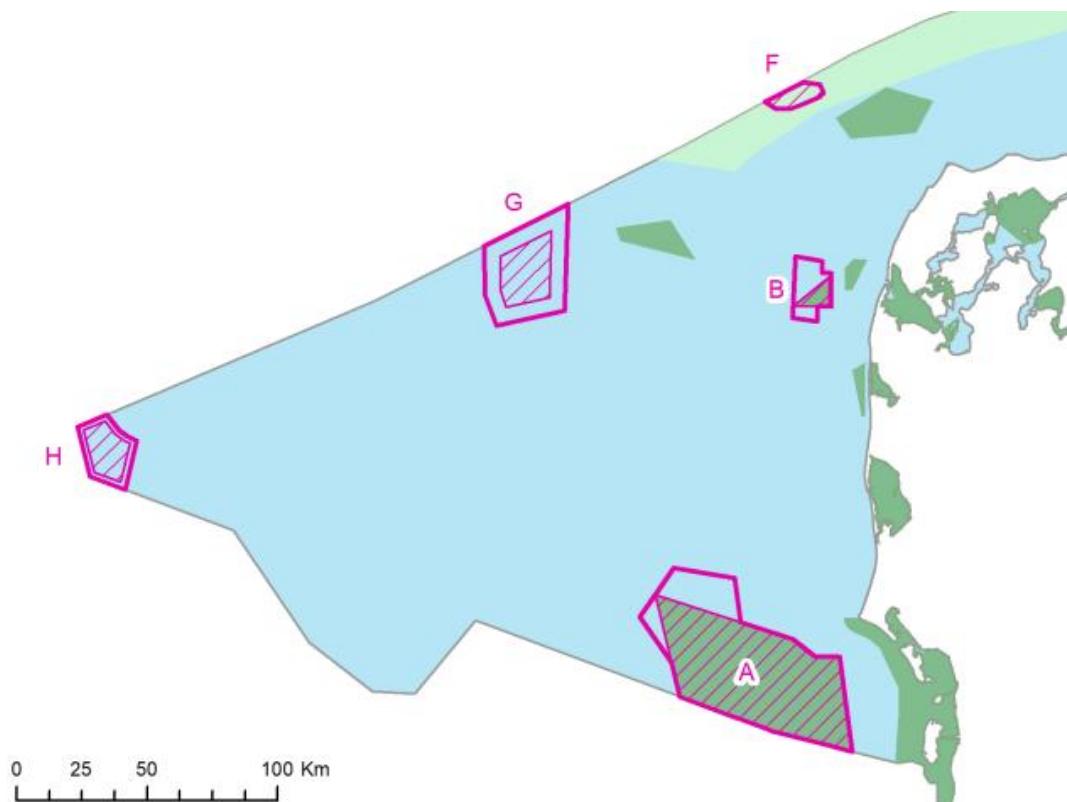


Figure 6-24 Selection of the protected areas in the North Sea under the Marine Strategy Framework Directive. Light green areas are new bird protected areas and dark green areas are existing protected areas (Ministry of Environment 2021).

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6.10 Human environment

Commercial and cultural interests in the western part of the Danish sector of the North Sea include:

- Oil and gas extraction
- Shipping
- Wind power
- Fishery
- Cultural heritage

6.10.1 Oil and gas extraction

Hejre is located in a part of the central North Sea with other oil and gas activities. The closest existing oil and gas facilities in operation to Hejre is the Total operated Harald and Svend and the INEOS operated South Arne (Figure 2-1).

6.10.2 Shipping

Data from the AIS system (Automatic Identification System) shows the intensity of merchant vessels in the central North Sea of the year 2018 (Figure 6-25).

It is seen that Hejre and South Arne are situated far from major shipping lanes. Hejre is situated at the outskirts of a minor shipping lane. Appropriate measures are already implemented to minimize the risk of ship collision with the Hejre field. These include safety zones around the platform in form of a circle with a radius of 500 m and exclusion zones of 200 m on either side of the pipeline to the host platform.

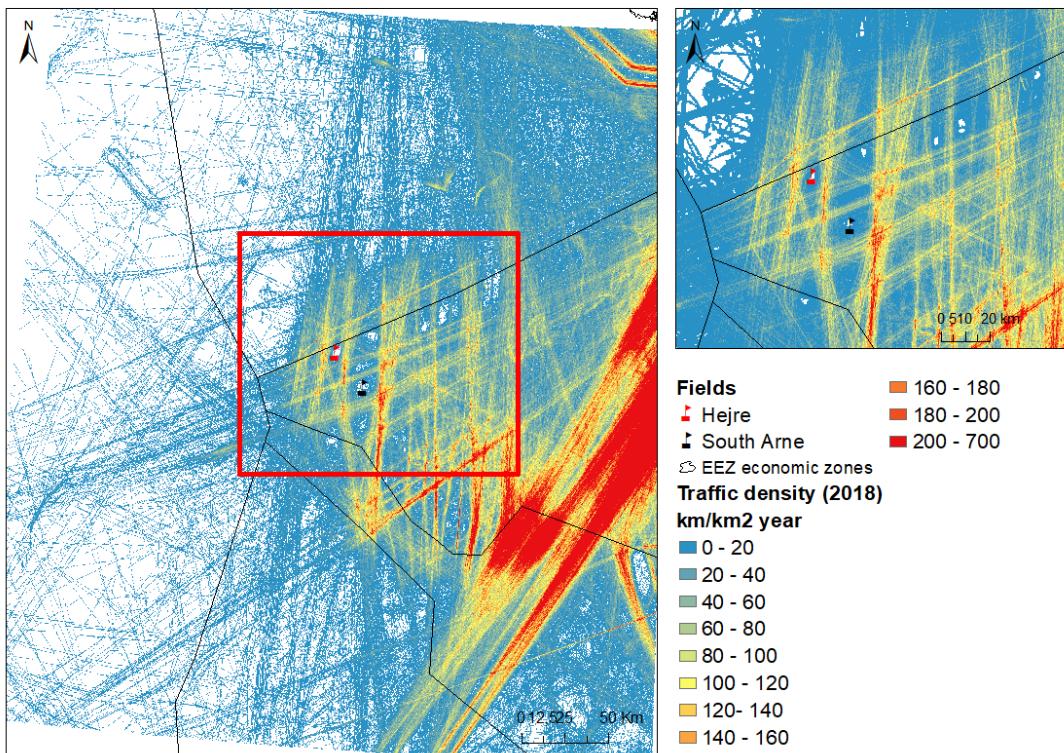


Figure 6-25 Ship traffic in the North Sea based on AIS data from all ships in 2018. Offshore service-related traffic is not included.

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6.10.3 Wind power

The closest windfarm is located more than 200 km from the platform at Horns Rev. The offshore windfarms at Horns Rev include Horns Rev I, Horns Rev II and Horns Rev III with a total of 200 wind turbines. In addition, there is planned one offshore wind farm (Sørlige Nordsjø II) the Norwegian sector of the North Sea bordering the Danish sector of the North Sea (approximately 10 km from Hejre).

6.10.4 Fisheries

Figure 6-26 shows the fishing effort of Danish vessels using active gear (dredgers, beam trawl, pelagic trawl, otter trawl or demersal seiners) in the eastern North Sea during the period 2007-2015. Figure 6-27 shows the fishing effort using passive gear (i.e., mainly gill nets) in the same area during the same period.

It is seen that Hejre and South Arne are situated in an area with low fishery intensity. The fishery intensity is concentrated in the following areas:

- Along the edge of the Norwegian trench and the Skagerrak;
- Along the Danish west coast.

The main fishing, which takes place in the Danish sector of the North Sea (COWI 2015) are:

- Fishery for Norway lobster, using otter trawls;
- Industrial fishery for sand eel by trawlers using small meshed demersal trawl in industrial fisheries (i.e. for fishmeal);
- Industrial fisheries for sprat for fish oil and fish meal using small-meshed trawls; and
- Mixed fishery for flatfish using primarily otter trawl and gill nets.

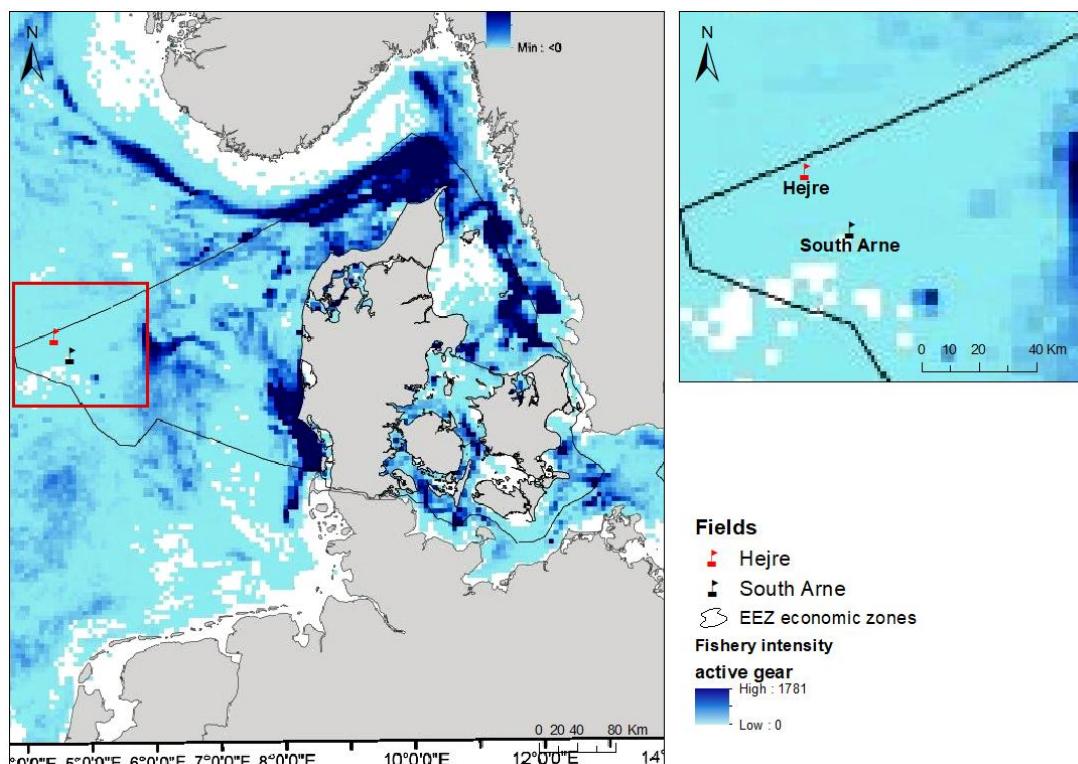


Figure 6-26 The distribution of active fishing intensity based on VMS and AIS data from the period 2007-2015 (Based on Egekvist et al 2018). Active fishing includes the use of dredgers, beam trawl, pelagic trawl, otter trawl or demersal seiners.

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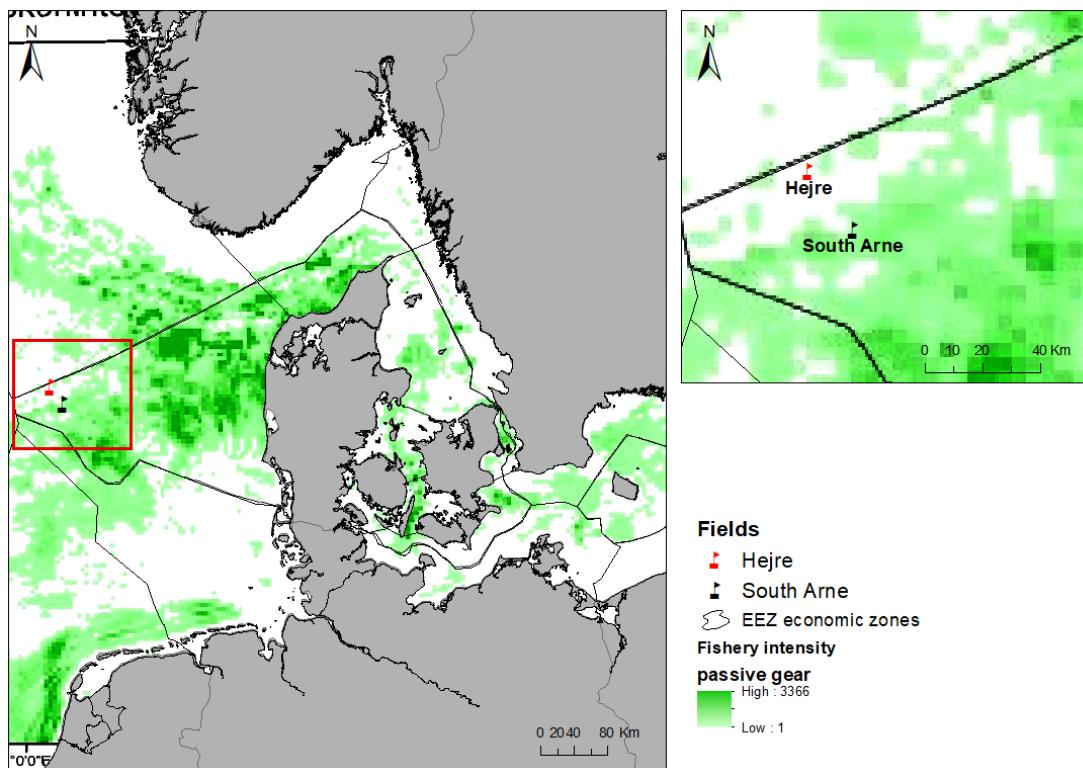


Figure 6-27 The distribution of passive fishing intensity based on VMS and AIS data from the period 2007-2015 (Based on Egekvist et al. 2018). In the area passive gear used is primarily gill nets.

6.10.4.1 Danish catches in the project area

In terms of value, the most important fish species around the South Arne are sand eel, plaice, turbot, lemon sole, cod and monkfish. Sand eel alone makes up 95% of the value of fish caught in this area. The distribution of the Danish total fishery catches is shown in Figure 6-28.

Compared to the fish catch in the North Sea, sand eel fishery is of some significance in the area around South Arne (ICES square 41F4), during the period 2014-2018. However, the remaining fish species are of less importance. The distribution of catches of the most important fish species (sand eel, plaice, turbot, lemon sole, cod and witch flounder) are shown in Figure 6-30 to Figure 6-35.

The waters around South Arne/Hejre field are without significance for the fishery of other countries (MMO 2012, Van Oostenbrugge et al. 2010, Agenda 1999, Rogers & Stocks 2001).

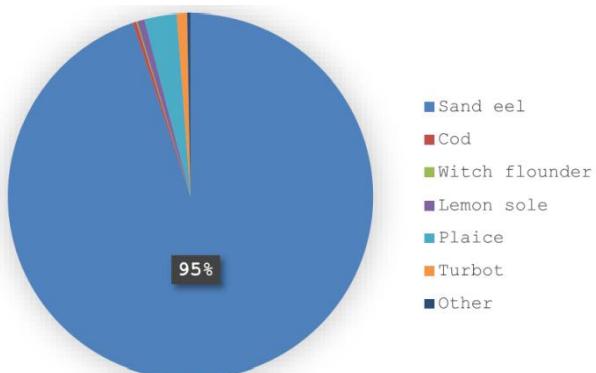


Figure 6-28 The value of key fish species caught in the South Arne area. Values represent an average during the period 2014-2018. Source: Danish Fisheries Agency, 2019.

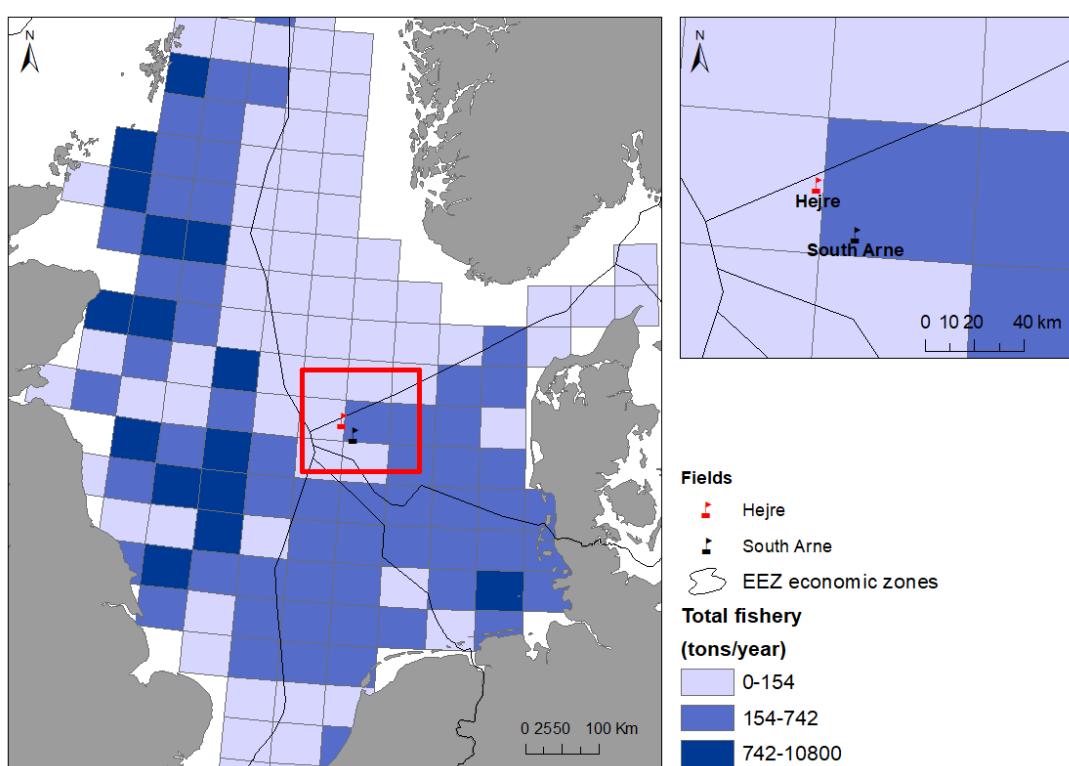


Figure 6-29 Mean catches of all fisheries in the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

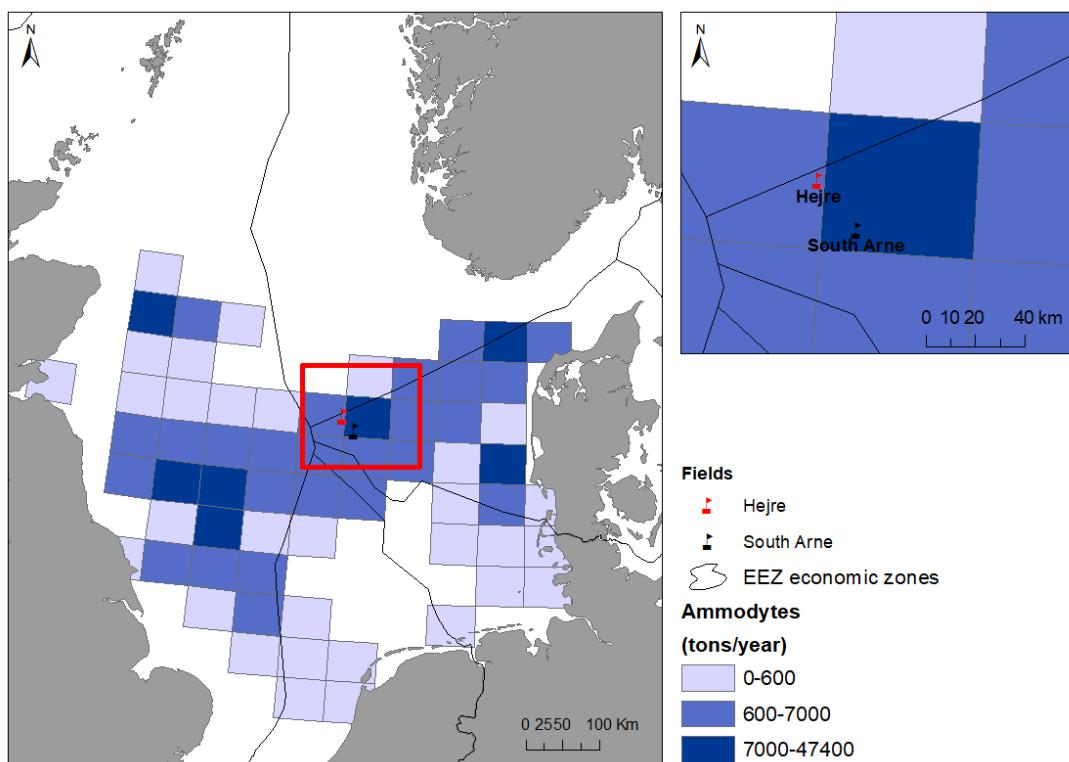


Figure 6-30 The value of the sand eel fisheries in the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

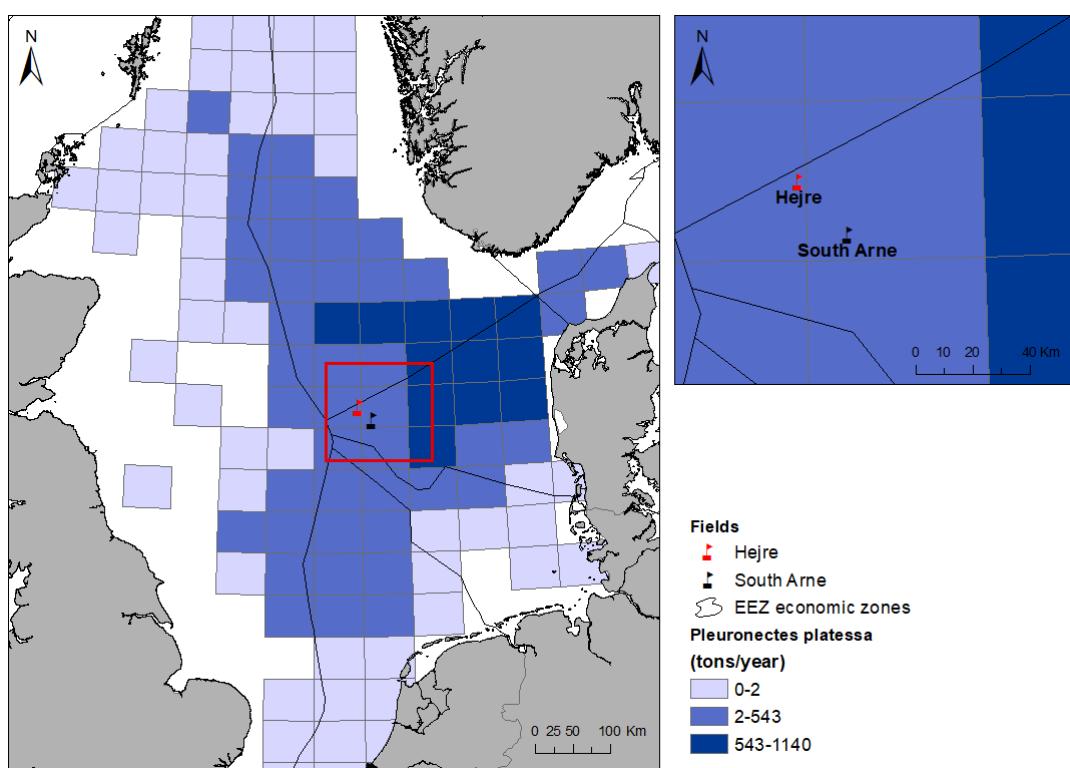


Figure 6-31 Mean Danish catches of plaice (*Pleuronectes platessa*), during the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

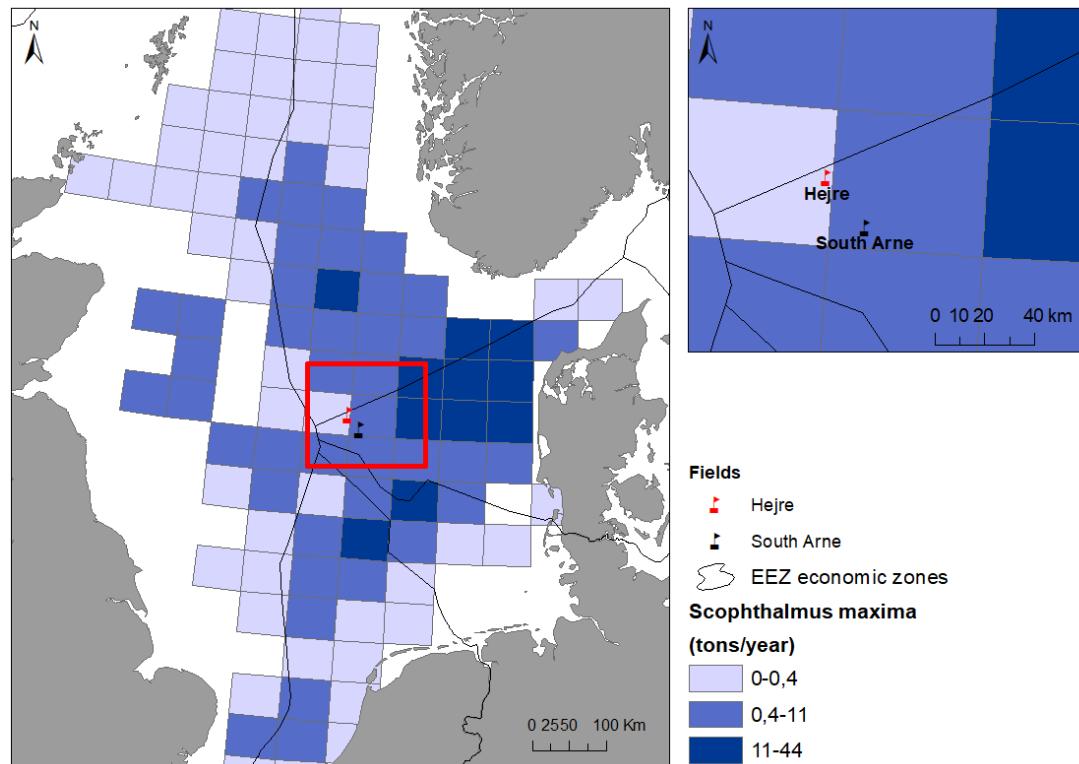


Figure 6-32 Mean Danish catches of turbot (*Scophthalmus maxima*) in the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

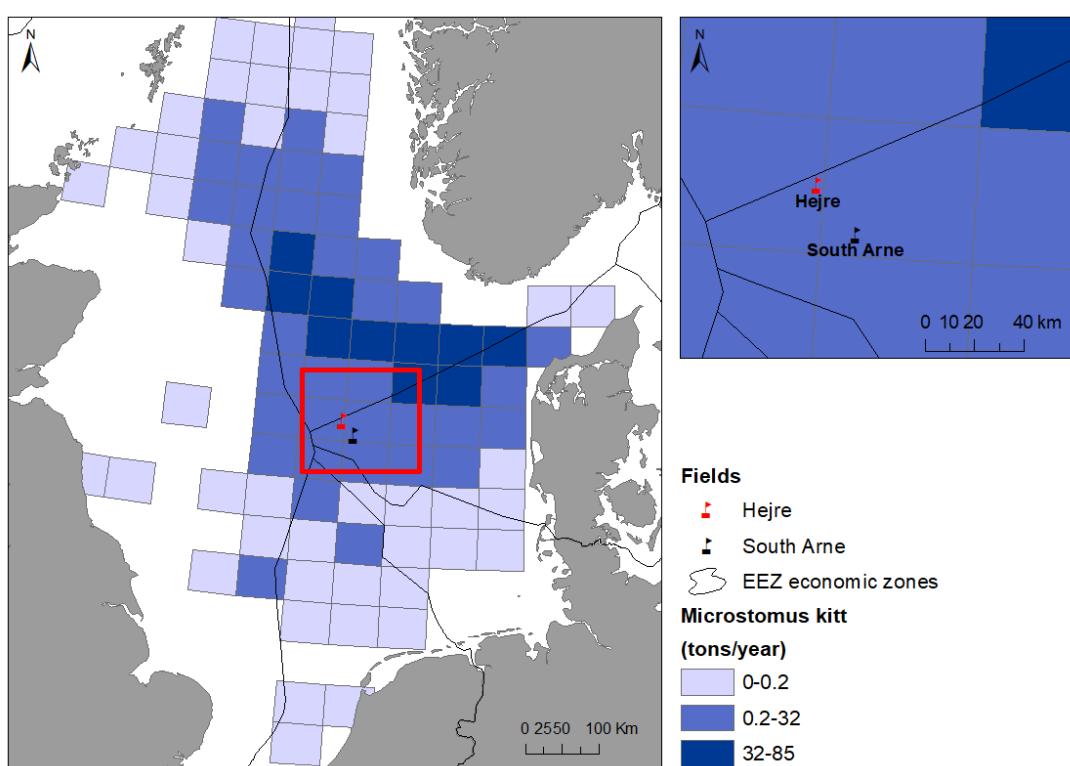


Figure 6-33 Mean Danish catches of lemon sole (*Microstomus kitt*) during the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

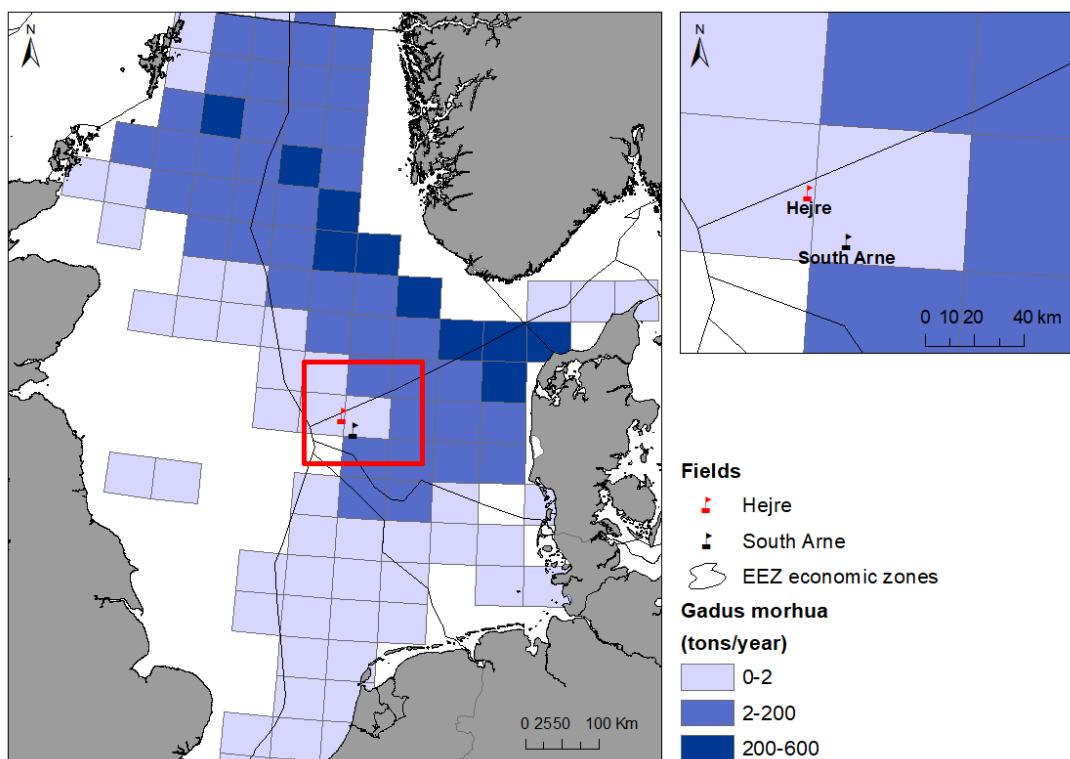


Figure 6-34 Mean Danish catches of cod (*Gadus morhua*) during the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

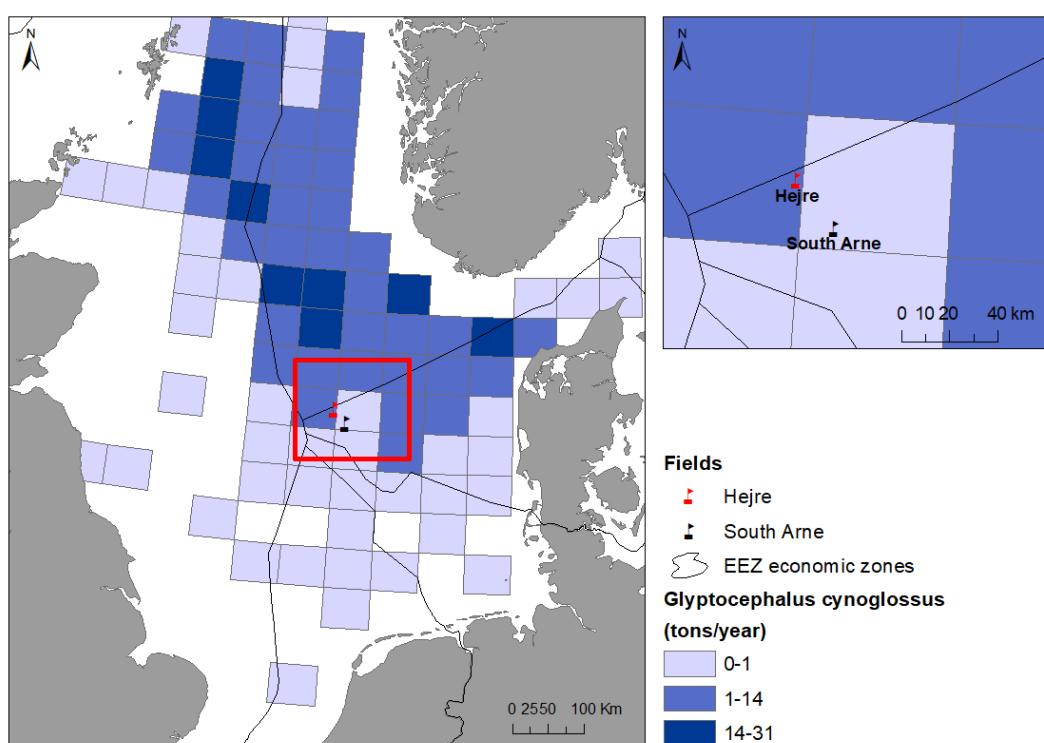


Figure 6-35 Mean Danish catches of witch flounder (*Glyptocephalus cynoglossus*) in the period 2014-2018. Mean catches are ranked in three percentile intervals: 0-50 (light blue), 50-90 (medium blue) and 90-100 percentile (dark blue). Based on data from the Danish AgriFish Agency (2019).

6.10.5 Cultural heritage

The only cultural heritage that potentially could exist in the project area is ship and plane wrecks. There are no registered wrecks in the project area (Palaces and Culture Agency, 2022). The closest registered wreck is located more than 10 km from Hejre and South Arne (Figure 6-36). The wreck is not protected.

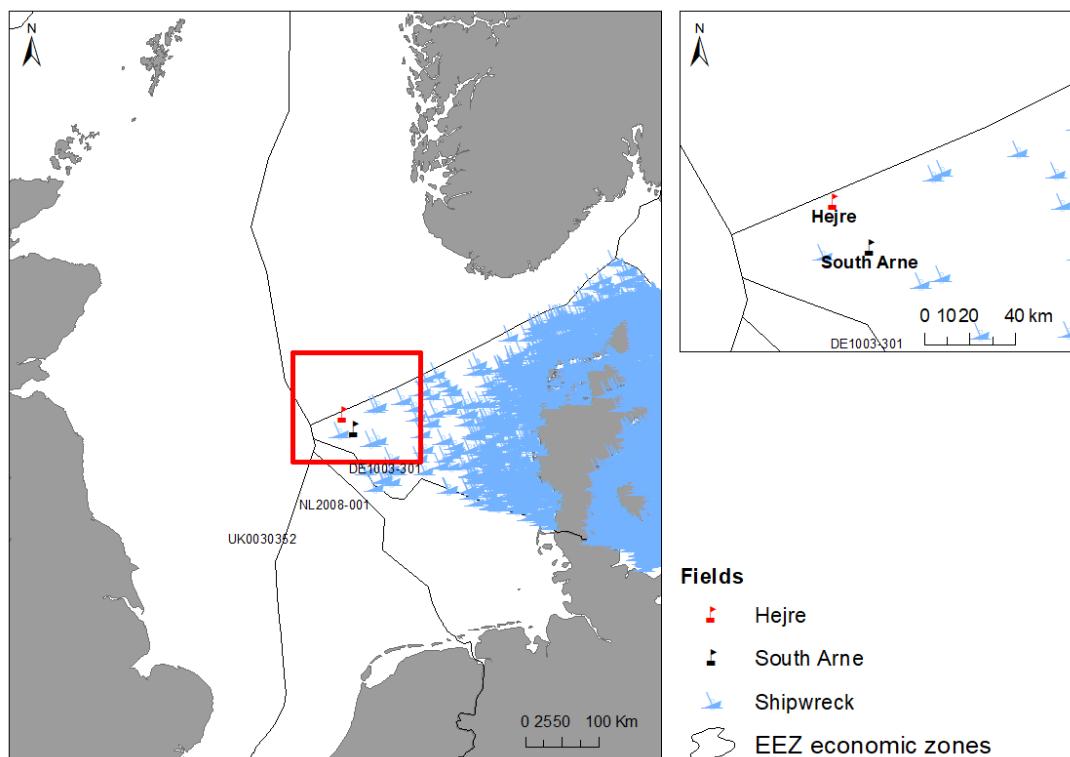


Figure 6-36 Registered wrecks in the project area (Palaces and Culture Agency 2022).

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7. Methodology

7.1 Methodology for evaluation of environmental severity and risk

The environmental significance (severity) and risk of impacts of the project on environmental and socioeconomic receptors have been evaluated using the following methodology.

7.1.1 Procedure for risk assessment

Environmental risk is the combination of the significance (severity) of an impact and the probability that an impact may arise. This implies for instance that an incidence that may cause severe impacts but is not very likely to occur has a low environmental risk.

For each operation or incidence, the assessment of environmental risk includes three steps:

- Assessment of environmental significance (severity) of an impact;
- Assessment of the probability that an impact will occur;
- Assessment of risk by combining severity and probability.

7.1.2 Assessment of environmental significance (severity) of an impact

Qualitative assessments of environmental severity of impacts of different operations and events will be carried out for both the EIA and the Natura 2000 assessment. The assessment of severity includes the following steps:

- Assessments of nature, extent, duration and magnitude of impacts using the criteria shown in Table 7-1 including whether the impact is positive or negative, temporary or permanent.
- Assessment of the severity of impacts combining the assessments of extent, duration and magnitude of the impacts using the criteria shown in Table 7-2.

Table 7-1 Criteria for assessment of nature, extent, duration and magnitude of impacts.

| Criterion | Description |
|-----------------|--|
| Nature | <i>Nature of the environmental change</i> |
| Positive | Beneficial environmental change |
| Negative | Adverse environmental change |
| Extent | <i>The geographical area that may be affected by the impact</i> |
| Local | Only the place where the activities directly related to construction may occur |
| Regional | Effects may occur in the Central North Sea |
| National | Effects may occur in Danish waters |
| International | Effects may occur in the entire North Sea |
| Duration | <i>Period along which the impact is expected to occur</i> |
| Short-term | Less than 8 (eight) months |
| Medium-term | Between 8 (eight) months and 5 (five) years |

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| Criterion | Description |
|----------------------|--|
| Long-term | More than 5 (five) years |
| Magnitude | <i>The magnitude of impacts on environmental and social processes</i> |
| Small | If possible, the magnitude of an effect is assessed from results of environmental modelling. Otherwise, the magnitude of an effect is based on an expert assessment based on previous experience from other projects. The following factors are taken into consideration: |
| Medium | <ul style="list-style-type: none"> • The extent to which potentially affected habitats and organisms are unaffected by human activity • The numbers/areas of an environmental feature that will be potentially affected • The uniqueness/rarity of potentially affected organism and habitats • The conservation status of habitats or organism (Natura 2000 areas, Annex IV species etc.) • The sensitivity of the habitat/organism • The robustness of the organism/habitats against impacts, i.e., and evaluation of the ability to adapt to the impact without affecting the conservation status, uniqueness or rarity |
| Large | The potential for replacement i.e., an assessment of to what extent the loss of habitats or populations of organisms can be replaced by others. |
| Frequency | <i>How often the impact will occur</i> |
| Low | The impact occurs rarely or as a single event |
| Medium | The impact happens regularly |
| High | The impact happens often or continuously |
| Reversibility | <i>Whether or not an impact is permanent</i> |
| Reversible | The impact is not permanent |
| Irreversible | The impact is permanent |

Table 7-2 Criteria for assessment of severity of potential impacts of the project.

| Severity rating | Relation with the criteria on nature, extent, duration and magnitude that describe the impact |
|----------------------|--|
| Positive impact | The assessed ecological or socioeconomic feature or issue is improved compared to existing conditions |
| No impact | The assessed ecological or socioeconomic feature or issue is not affected |
| Insignificant impact | Small magnitude, with local extent, short-term duration, low frequency and reversible |
| Minor impact | 1) Small magnitude, with any combination of other criteria (except for local extent and short-term duration, and long-term duration and national or international extent) or 2) Medium magnitude, with local extent and short-term duration 3) Reversible impact |
| Moderate impact | 1) Small magnitude, with national or international extent and long-term duration; or 2) Medium magnitude, with any combination of other criteria (except for local extent and short-term duration; and national extent and long-term duration) 3) Large magnitude, with local extent and short-term duration 4) Some irreversible impact but at a local scale |
| Major impact | 1) Medium magnitude, with national or international extent and long-term duration 2) Large magnitude, with any combination of other criteria (except for local extent and short-term duration) 3) No reversibility of impact (irreversible) |

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7.1.3 Assessment of the probability that an impact will occur

The probability that an impact will occur will be assessed using the criteria shown in Table 7-3.

Table 7-3 Criteria for assessment of the probability of that an impact will occur.

| Probability criterion | Degree of possibility of impact occurrence |
|-----------------------|---|
| Very low | The possibility of occurrence is very low, either due to the project design or due to the project nature, or due to the characteristics of the project area |
| Low | The possibility of occurrence is low, either due to the project design or due to the project nature, or due to the characteristics of the project area |
| Probable | There is possibility of impact occurrence |
| Highly Probable | Possibility of impact occurrence is almost certain |
| Definite | There is certainty that the impact will occur |

7.1.4 Risk assessment

The environmental risk of different operations and incidences will be assessed combining significance (severity) and probability of an impact according to a risk matrix as outlined below (Table 7-4).

Table 7-4 Qualitative risk assessment matrix.

| | | Significance (severity) of impact | | | |
|-----------------|----------------------|-----------------------------------|------------------|------------------|--|
| Probability | Insignificant Impact | Minor impact | Moderate impact | Major impact | |
| Definite | Negligible risk | Low risk | Significant risk | High risk | |
| Highly probable | Negligible risk | Low risk | Significant risk | High risk | |
| Probable | Negligible risk | Negligible risk | Low risk | Significant risk | |
| Low | Negligible risk | Negligible risk | Low risk | Low risk | |
| Very low | Negligible risk | Negligible risk | Negligible risk | Low risk | |

8. Environmental impacts of planned activities during the construction phase

8.1 Potential impacts

The potential environmental impacts of the following operations during the construction phase assessed in this EIA comprise of:

- Impacts of discharges to the sea during completion of wells and pressure testing of pipelines
- Direct impacts in pipeline footprint and indirect impacts of dispersal of sediment during laying of pipelines
- Impacts of noise and disturbance during the construction phase
- Impacts of artificial light during the construction phase
- Impacts of emissions to the atmosphere during the construction phase
- Impact from waste and sewage
- Impacts of accidental spills
- Cultural heritage
- Hydrography

Figure 8-1 and Table 8-1 below provide overviews of potential effects during the construction phase assessed in the EIA. This chapter deals with environmental impacts of planned activities. Environmental impacts of accidental spills are dealt with in chapter 11 Environmental impact of accidental oil and chemical spills and socioeconomic impacts are described and assessed in chapter 13 Socio-economic assessment.

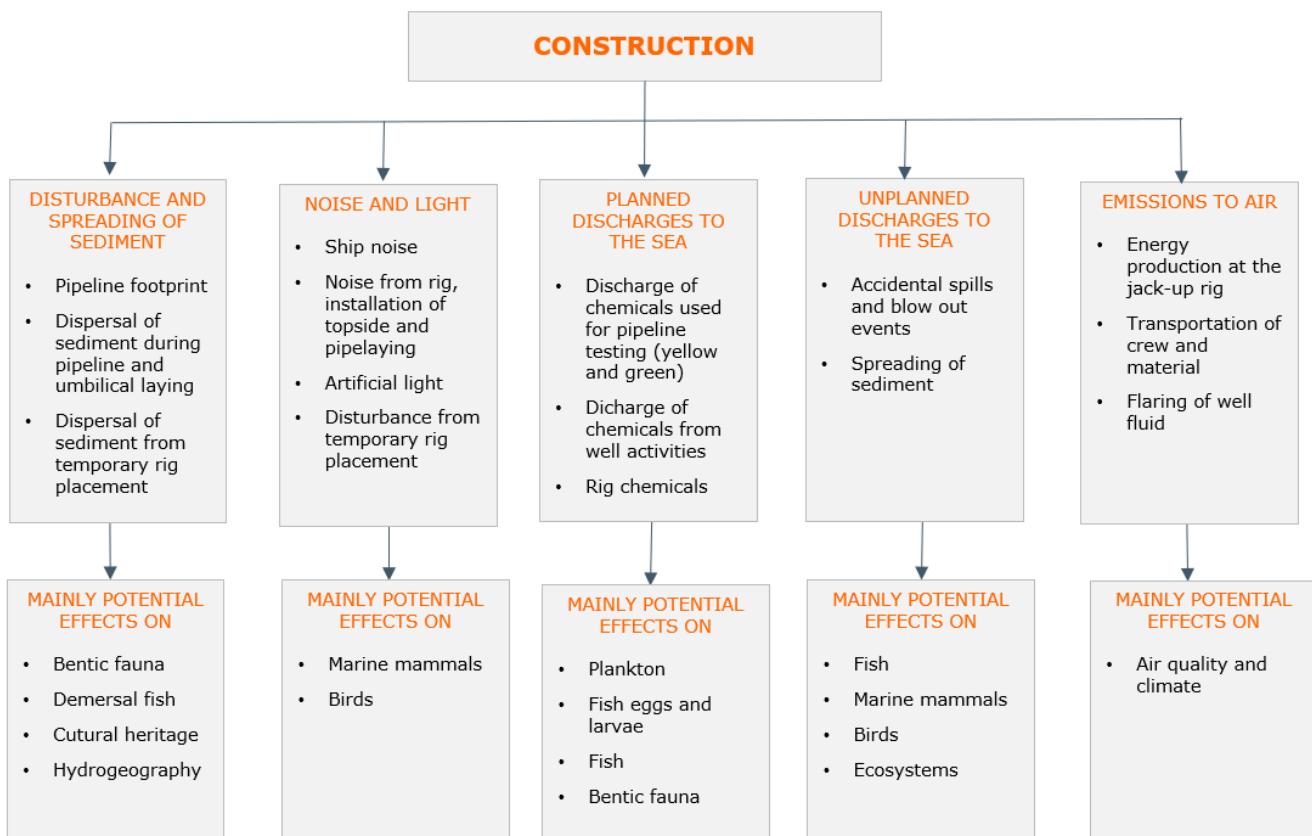


Figure 8-1 Overview of activities during construction that may have an impact on the environment and organisms that may primarily be affected by the different operations which will be assessed in the EIA.

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Table 8-1 Overview of potential environmental and socioeconomic impacts of planned activities during construction which are assessed in the EIA.

| Activity | Potential Impacts |
|---|---|
| Well completion and cement plug remedial | <p>Presence of jack-up rig</p> <p>Physical disturbance benthic fauna and loss of sea floor integrity.</p> <p>Presence of rig during well perforation and clean up and cement plug remedial</p> <p>Discharges of utility chemicals can impact on water quality and marine fauna. However, only yellow and green chemicals are discharged.</p> <p>Operation of jack-up rig and supporting vessels causing emissions to the air</p> <p>Release of particles (PM_{10}) and gaseous emissions (SO_x, NO_x, VOC,) with potential mainly local effects on air quality</p> <p>Release of gaseous emissions (CO, CO_2, CH_4) with potential effects on global climate</p> <p>Accidental spills and blowout</p> <p>Mainly birds, marine mammals, fish, coastal ecosystems, fisheries, aquaculture and tourism may be affected. Blowouts are extremely rare events</p> <p>Economic loss to fisheries, aquaculture and tourism due to oiling</p> |
| Pipelines and structures | <p>Laying of pipelines, including surveys, and installation of topside and other structures</p> <p>Physical impact on the seabed and benthic fauna through placement and presence of pipelines or subsea structures.</p> <p>Impact on fish eggs and larvae from suspended and settled sediment.</p> <p>Noise disturbance to marine mammals resulting in behavioural avoidance.</p> <p>Release of particles (PM_{10}) and gaseous emissions (SO_x, NO_x, VOC, CO, CO_2, CH_4) from vessels with potential effects on air quality and climate.</p> <p>Interference with shipping and fishing as a result of the presence of installation vessels outside the exclusion zone.</p> |

8.2 Impacts of perforation and clean-up of Legacy wells and remedial cement plug in HA-5

Perforation and clean-up of the three existing Legacy wells to be used for the production at Hejre (HA-1A, HA-2 and HA-4) will take place with only minimal discharge and, hence, the perforation and clean-up activities will not be associated with impacts on the marine environment. During operation in HA-5 the cement plug will be partly drilled out and a new plug will be set. OBM will be used during the drilling activities. The cementing pieces will be circulated out of the well with the OBM during the plug-drilling operations and thus also be shipped to shore for disposal. The inhibited fluid in the wells will be led to the rig's slop unit and further on to South Arne for processing and reinjection with produced water. New inhibited water will be left in the HA-5 well. Thus, no discharges will take place.

It is expected that the rig utility chemicals used on the rig will be 100% discharged. Any surplus inhibited fluid not left in HA-5 for preservation will be collected and sent onshore.

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The discharge of rig utility chemicals related to perforation, clean-up of wells and remedial cement plug in HA-5, has been modelled and assessed below in Table 8-2. The chemicals for which the PEC/PNEC ratio exceed 1 is shown along with the distance where exceedance can be expected.

Table 8-2 Modelling of impact of discharge of chemicals used during perforation, clean-up of Legacy wells and HA-5 cement plug.

| Activity | Type of chemical | Max. distance (m) from discharge point at which PEC/PNEC = 1 (assessment factor = 1000) Long term | Duration of discharge |
|-------------------|------------------|---|-----------------------|
| Utility chemicals | Rig wash | <1500 | 1 hour |
| | Jacking grease | <100 | 10 days |
| | Hydraulic oil | <100 | 10 days |

From the above results it can be seen that effects are within a maximum of 1,500 m from the point of discharge. Furthermore, the discharges are short term batch discharges and thus the impact can be expected to be low.

8.2.1 Risk assessment – Perforation and clean-up and remedial cement plug in HA-5

Based on the above and using the criteria described in chapter 7, it is assessed that the environmental risks related to the perforation and clean-up of the Hejre Legacy wells and remedial cement plug in HA-5 is **Negligible** (Table 8-3).

Table 8-3 Environmental severity and risk of impacts of perforation and clean-up and remedial cement plug in HA-5.

| Impact | Extent of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|--|------------------|--------------------|---------------------|----------------------|-----------------------|--------------------|
| Impacts of perforation and clean-up and remedial cement plug in HA-5 | Local | Short term | Small | Insignificant impact | Probable | Negligible |

8.3 Impacts of the laying of pipelines

The construction of the Hejre tie-back to South Arne development project includes the laying of a 33 km multiphase pipeline from Hejre tie-back to South Arne, in addition to a power cable from South Arne with power and control from host.

The pipeline will be buried by trenching, either through ploughing or jetting. The method to be used will be based on an evaluation of the seabed conditions by the pipe laying contractor. After exiting the trench, the non-trenched part of the pipelines will be protected by rock dump and concrete mattresses. A total of 41,000 MT of rocks will be used and 175 concrete mattresses with 6 meters x 3 meters dimensions and 0.3 meters thickness.

8.3.1 Possible effects during laying of pipelines

A pre-lay survey and a post-lay survey will be conducted prior to and after installation of the pipeline and power cable. Potential impacts from underwater noise are discussed in Section 8.5. For completeness, the result from this overall impact assessment from underwater noise is included in Table 8-19.

The pipeline will be laid in the seabed consisting of sandy sediment. The seabed at Hejre and South Arne is characterised as fine sands. There will also be large areas with muddy sand (Figure 6-8). The laying of

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the pipeline, and the following protection with concrete mattresses and rocks will disturb the seabed and cause temporary turbidity of the water and subsequent settling of the suspended material on the seabed. This may affect organisms buried in the seabed (benthic infauna) and organisms living or immediately above the seabed in various ways.

The sediment may also contain contaminants which can be mobilised during the laying of pipelines. A baseline survey conducted at Hejre field in 2013 prior to drilling, showed that the concentrations of all investigated contaminants (PAH, THC, NPD and heavy metals) were low and generally well below the assessment criteria for sediment contamination provided by OSPAR. There was no difference between the concentrations of contaminants in samples from Hejre and from a reference station located 15 km north of Hejre. An assessment of contaminants in the sediment around the South Arne platform was conducted in 2021. Concentrations of contaminants (PAHs and heavy metals) were generally low and below the HEL-COM/Danish Targets. In general, there is no correlation between concentrations of contaminants and distance to the Syd Arne platform. The exception is barium for which the average concentration was higher than the potential toxic concentrations (TEL) and concentrations decreased with the distance from the platform. Barium is associated with drilling activities but is not considered toxic, and therefore no assessment criteria are defined for barium. Based on the relatively low concentrations of contaminants in the upper sediment surface and the limited expected dispersion of sediments (see below), impacts from the potential mobilisation of contaminants are not expected.

8.3.1.1 Dispersion of sediments

Two methods are considered for trenching: ploughing or water jetting. Of the two techniques water jetting result in the highest levels of suspended particles and a larger area will be affected.

Trenching of pipelines will create suspension of sediment to the water column which will gradually settle on the seabed again. Coarser particles will sediment in the vicinity of the laying track while finer particles will disperse further downstream before they settle. The disturbance period from dispersion of sediment is relatively short and local.

Calculations made in the Baltic Pipe EIA for the part of the 30" gas pipeline located in the North Sea indicated that most of the sediment suspended after jetting of the pipeline would settle close to the trench in a 75 mm thick layer. Hereafter the sediment layer would gradually decrease within a distance of 50 meters from the trench (NIRAS, 2019). Finer particles such as silt would disperse to a larger area (up to 500 meters from the trench), but settle in a very thin layer of max 0,6 mm.

The following protection of the untrenched parts of the pipe by rock dump and concrete mattresses will also cause sediment suspension, but not nearly to the same degree as for the trenching of the pipes. This resuspension is therefore assumed included in the below assessment of effects of laying the pipelines.

8.3.1.2 Impacts on benthic fauna and fish

Most benthic fauna species in the direct footprint of the pipeline, will be damaged or killed during ploughing or jetting, either through direct contact with the installation device or due to burial. This footprint is expected to be narrow, generally restricted to 2-3m width. In addition, settled dispersed sediment beyond the footprint may affect organisms locally.

Findings of studies for a number of UK offshore wind farms indicate that the disturbance to seabed sediments during cable trenching is likely to be short term and relatively localised, especially if ploughing techniques are utilised (BERR 2008). During jetting of a cable in sandy sediment, the concentrations of suspended sediments were measured to a mean of 2 mg/l (max 18 mg/l) within a 200 m distance from the operation site (BERR 2008). Backfilling of the cable footprint resulted in a mean suspended sediment concentration of 5 mg/l. The study also indicated that the suspended sediment remains within a distance of 1-2 m

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from the seabed. Concentrations of similar magnitudes are expected during ploughing/jetting and backfilling of a pipeline between Hejre and South Arne.

Suspended particles may have negative impacts on aquatic organisms as shown in Table 8-4. Comparing Table 8-4 to these effect levels with the dispersal distance reported in BERR (2008), it is likely that zooplankton, fish eggs and fish larvae may be impacted within an area of ca. 200 m from the footprint and that sensitive pelagic fish species such as herring may avoid this area during the ploughing/jetting phase.

The area between Hejre and South Arne is spawning area for cod, plaice, lemon sole and mackerel, and potentially also for sand eel, whiting, dab and long rough dab (section 6.6). If the laying of pipeline takes place during the spawning season, eggs and larvae of these species may be negatively affected. However, it is argued that any such impact will be insignificant and will in no way affect the population size of these fish species. Firstly, the duration of elevated concentration particles above effect concentrations is limited to few hours at any site. Secondly, fish species produce vast numbers of eggs and larvae and have extensive spawning grounds. Based on the above arguments, spreading of sediment will not affect the spawning stock and stock recruitment of fish that spawn in the area including cod that is in a poor condition. Sand eels is a demersal spawner and vulnerable to physical disturbance of the seabed. However, since the area is not a core spawning area for sand eel, it is assessed that the environmental risk of an impact on spawning stock and recruitment of sand eel is negligible.

European sturgeons are anadromous and primarily coastal species but may appear in the project area as successful release programs has caused the species to begin appearing as bycatch in the North Sea. It is however still rare events (OSPAR, BDC2020/European or Common sturgeon, 2020), and as such it is not expected to find European sturgeons in the Hejre to South Arne area. Studies on effects of underwater noise have shown that sturgeons react to events that cause vibrations of the seafloor (Popper & Calfee, 2023) by leaving the area (Krebs, Jacobs, & Popper, 2016). This is covered in chapter 8.5.2. It is therefore expected that sturgeons will move away from the area, where the cable is being placed, rather than staying. It is also expected, based on the above literature, that sturgeons will come back when the disturbance is over. These behavioural reactions are not considered deliberate disturbance because the disturbance is short term, fully reversible and take place in a limited impacted area that is not considered particularly important for European sturgeon that is a predominantly coastal species. Further, it is not a breeding site, as sturgeons are anadromous and strictly breed in rivers, and this project can therefore not negatively impact breeding sites. Following installation of the pipes and cable, sturgeons can therefore swim back and continue using the area as neither individuals or the population is harmed.

Due to the rarity of European sturgeons, especially offshore, the lack of breeding habitat near Hejre and the short-term and local effect of disturbance due to this project, it is assessed that the project activities will not cause a deterioration or destruction of breeding or resting sites for this Annex IV-species.

Table 8-4 Lethal and sublethal effects of elevated concentration of suspended particles in the water column observed in the laboratory.

| Observed effect | Effect concentrations | References |
|--|-----------------------|--|
| Avoidance reactions. Herring and smelt may avoid the plume of suspended matter, if the concentration is sufficiently high to cause inconvenience. | ≥ 10 mg/l | Wildish & Power 1985, Johnston & Wildish 1981, Wildish et al. 1977 |
| Lethal effects. Increased mortality of juvenile copepods (<i>Calanus helgolandicus</i>) | ≥ 6 mg/l | Paffenhofer 1972 |

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| Observed effect | Effect concentrations | References |
|---|--|-----------------------------|
| Lethal effects. Survival of cod eggs, cod larvae and herring larvae may be reduced because of elevated concentrations of suspended particles | Cod eggs \geq 5 mg/l Cod larvae \geq 10 mg/l Herring larvae \geq 20 mg/l | Engell-Sørensen & Skyt 2000 |

Shortly after the backfilling of the footprint, benthic fauna will recolonize the affected areas. The organisms will immigrate from undisturbed areas and from larvae settlement (Støtrup et al., 2007; K. M. Dernie, 2003; COWI/DHI Joint Venture 2001, Kiørboe & Møhlenberg 1982). The community will usually be re-established within 0.5-2 years after the disturbance (Kiørboe og Møhlenberg 1982). Recovery of the echinoderms including *Amphiura filiformis* may take a longer time, due to slow growth and late maturity.

The ocean quahog (*Arctica islandica*) is listed as threatened and vulnerable in accordance with OSPAR list of threatened and declining habitats and species, and thus protected from adverse human impacts through the obligations defined in the OSPAR annex V. It is associated with soft bottom habitats as those present in the project area and can reach densities of up to >100 individuals/m² within its distribution range. Though it is found to be lower in the North Sea with typical densities <12 individuals/m² The reported average density was of 6.7 individuals/m² (OSPAR, 2009).

The impact is reversible and the affected area constitutes $<0,001$ % of the habitat distribution in the region and is well below the threshold given in the MSFD for disturbance (25%) thus conserving sea floor integrity as defined in MSFD. While benthic species, including individuals of *A. islandica*, are likely to be lost, the function of the habitat will not be permanently affected, and allow recolonization of benthofauna. Although growth and recruitment are low for the *A. islandica*, it will not be permanently excluded from the impacted area. As a result, the project will not have adverse effects on *A. islandica* on a population level or at regional scale, nor will it alter species composition or biotic function of the habitat as a whole.

Common fish species for the area such as haddock, dab and rough dabs, which stay on the seabed or within the bottom 1-2 m of the water column may temporarily avoid the area. Because the disturbance will be temporary, short term and confined to a small area compared to the potential available living space, measurable impacts on the fish population are not anticipated.

Sand eels may also be found in the affected area. Sand eel lay their eggs on the seabed. If pipe laying takes place during the spawning season (December – July), sand eel eggs may be destroyed. As each sand eel females lay thousands of eggs and as the potential area in which eggs may be destroyed is infinitely smaller than the total spawning area in the North Sea, this will not measurably affect the sand eel stocks.

8.3.2 Possible effects during testing of pipelines

The new pipeline to be tested comprises a 33 km multiphase pipeline from Hejre tie-back to South Arne.

The pipeline will be pressure tested using seawater that has been added a combined corrosion inhibitor, biocide and oxygen scavenger ("test cocktail") and a fluorescent tracer chemical. Upon testing of the Hejre tie-back to South Arne pipeline , the pressure-test water and chemicals will be discharged from the pipeline via South Arne. The discharge will have a duration of about 24 hours. The discharge has been modelled and assessed below.

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Table 8-5 Modelling of impact of discharge of pipeline chemicals

| Activity | Type of chemical | Max. distance (m) from discharge point at which PEC/PNEC = 1 (assessment factor = 100) Short term | Duration of discharge |
|---|---|---|-----------------------|
| Pressure testing, pipeline Hejre tie-back to South Arne | Combined pressure test cocktail (corrosion inhibitor, biocide and oxygen scavenger) | <1000 | 24 hours |
| | Fluorescent tracer chemical | <100 | 24 hours |

Discharges from pressure testing is short-term (max. one day), and thus the distance of impact is also modelled based on short-term PNEC values (derived based on acute L(E)C₅₀ data and using an assessment factor of 100 in accordance with WFD Technical Guidance Document No. 27, 2018, Section 3.4.2). It can be seen that the distance where potential short-term impact of a chemical might occur is <1000 m.

Based on the above it is assessed that toxic effects on any eggs or larvae of fish that may be spawning in the area and other plankton organisms will be local, marginal and without measurable impacts on the stocks.

8.3.3 Risk assessment - Laying of pipelines

Based on the above and using the criteria described in Chapter 7, it is assessed that the environmental risks related to the laying of pipelines is **Negligible** (Table 8-6).

Table 8-6 Environmental severity and risk of impacts of laying of pipelines.

| Impact | Extent of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|--|------------------|--------------------|---------------------|----------------------|-----------------------|--------------------|
| Impacts of the laying of pipelines – dispersion of sediments | Local | Short term | Small | Insignificant impact | Highly probable | Negligible |
| Impacts of the discharge of pipeline testing chemicals | Local | Short term | Small | Insignificant impact | Probable | Negligible |

8.4 Impacts of air emissions

The emissions related to the planned activities during the construction phase are described in the following. The main activities causing emissions during construction are (including emissions during transport):

- Well completion activities and remedial cement plug in HA-5 including well clean-up
- Installation of the pipeline
- Installation of the topside at Hejre
- Modifications at South Arne and installation of tie-in module

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8.4.1 Emissions related to well perforation and clean-up activities and remedial cement plug in HA-5

In relation to the Hejre tie-back to South Arne development project well completion of three wells, remedial cement plug in HA-5 and clean-up of the wells will take place (INEOS Oil & Gas Denmark well and drilling data, 2019). Emissions to air from well service activities are related to:

- Energy production at the jack-up rig
- Transportation of crew and material by helicopter, standby boat, tugs and supply boat
- Flaring of well fluid during clean-up

Energy consumption at the rig will mainly be used for completion of 3 wells and r remedial cement plug in 1 well including power supply to pumps and compressors. Energy consumption for other purposes such as the accommodation module etc. is expected to be marginal. The energy is provided by generators powered by diesel engines. It is expected that the rig will be needed for 100 days in total.

A standby vessel is required, when rig activities are conducted, and thus the standby boat is operating 24 hours. The standard emission factors for rig and vessels are from The Norwegian Oil and Gas Association (NOGA, 2022).

All materials, supplies, waste etc. will be transported offshore/onshore by supply vessels. It is estimated that 1 vessel will be in operation approx. 11 hours per day, 2 times a week for 100 days, which will be 13 days in total for the well service activities. The standard emission factors for vessels are from The Norwegian Oil and Gas Association (NOGA, 2022).

Transportation of crew between shore and offshore is performed by helicopter. They are assumed to be in operation 3 hours per day for 100 days, which will be 13 days during completion and remedial cement plug activities. The standard emission factors for helicopters are from E&P Forum (E&P Forum, 1994).

After the wells have been perforated, they will be cleaned up via rig-based test equipment until acceptable production fluid values are reached (expected duration of 12-24 hours per well). Well fluids will be produced to surface and burned via the rig-based burner. It is estimated that approx. 967,000 Sm gas and 3,000 Sm³ oil in total will be flared.

An estimate of the emissions related to the well activities is shown in Table 8-7.

Table 8-7 Estimated emissions related to the perforation, clean-up and remedial cement plug activities.

| Well completion and remedial activities | Number of vessels | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|---|-------------------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Rig | 1 | 100 | 10 | 2,700 | 50 | 4 | 0.1 | 2 |
| Standby boat | 1 | 100 | 3 | 810 | 15 | 1.5 | 0.05 | 0.5 |
| Tugs | 3 | 20 | 20 | 3,300 | 60 | 4 | 0.2 | 2 |
| Supply vessel | 1 | 13 | 10 | 360 | 6 | 0.5 | 0.02 | 0.2 |
| Helicopters (kerozene) | | 13 | 1.2 | 40 | 0.2 | 0.05 | 0.001 | 0.01 |

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| Well completion and remedial activities | Number of vessels | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|---|-------------------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Well clean-up | | - | - | 11,425 | 11 | 10.2 | 1.1 | 8.5 |
| Total [ton] | | | | 18,635 | 142 | 20 | 1.45 | 13 |

8.4.2 Emissions related to pipeline installation

The Hejre tie-back to South Arne concept will include laying of pipelines connecting Hejre and South Arne.

Emissions to air during pipelay activities are related to:

- Transport activities and operation by the fleet used for pipelay (pipelay vessels and other special vessels)

The operation of the fleet includes transportation activities and operation activities such as pipelay, trenching, rock dumping etc. The standard emission factors for rig and vessels are from The Norwegian Oil and Gas Association (NOGA, 2022).

An estimation of the emissions related to the pipelay activities is carried out in Table 8-8.

Table 8-8 Estimated emissions related to the pipelay activities.

| Pipelay activities | Number | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|---|--------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Pipelay vessel ¹⁾ | 1 | 30 | 20 | 1,650 | 30 | 2 | 0.1 | 2.5 |
| Survey vessel (ROV) ²⁾ | 1 | 35 | 5 | 500 | 10 | 1 | 0.02 | 1 |
| Trenching/back-filling vessel ³⁾ | 1 | 20 | 20 | 1,100 | 20 | 1 | 0.05 | 2 |
| Guard vessel | 1 | 30 | 0.5 | 40 | 1 | 0.05 | 0.002 | 0.06 |
| Diving support vessel (DSV) ⁴⁾ | 1 | 45 | 20 | 2,500 | 45 | 3 | 0.1 | 4 |
| Total [ton] | | | | 5,790 | 106 | 7 | 0,2 | 7 |

¹⁾ Seven Navica (Subsea 7) or similar vessel
²⁾ Seven Petrel (Subsea 7) or similar vessel
³⁾ Skandi Skansen or similar vessel
⁴⁾ Seven Atlantic (Subsea 7) or similar vessel

8.4.3 Emissions related to installation of the topsides

Emissions to air during installation of the topside at Hejre related to:

- Transport activities and operation by the Heavy Lift Vessel (HLV)
- Special vessels used for installation of the topside at Hejre and South Arne tie-in module.

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The emissions to air from fuel consumption in relation to the installation of the topside is mainly from the crane vessel, the barge and the tugboats, which shall transport and lift the topside and tie-in module into place.

The topside and tie-in module is transported on the same barge and thus only one barge and two tugboats are required. No fuel consumption is related to the barge, since the barge is towed by the tugboats. The standard emission factors for rig and vessels are from The Norwegian Oil and Gas Association (NOGA, 2022). An estimation of the emissions related to the topside installation activities is carried out in Table 8-9.

Table 8-9 Estimated emissions related to the topside and tie-in module installation activities.

| Topside and tie-in module installation activities | Number | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|---|--------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Heavy lift vessel ¹⁾ | 1 | 9 | 47 | 1,150 | 20 | 1 | 0.1 | 1 |
| Heavy lift vessel ²⁾ | 1 | 18 | 35 | 1,730 | 30 | 2 | 0.1 | 1 |
| Barge | 1 | 35 | - | 0 | 0 | 0 | 0 | 0 |
| Tugboats | 2 | 35 | 20 | 3,800 | 65 | 5 | 0.2 | 2.5 |
| Flotel for HUC ³⁾ | 1 | 125 | 3.5 | 1,200 | 20 | 2 | 0.1 | 1 |
| Total [ton] | | | | 7,880 | 135 | 10 | 1.5 | 5.5 |

¹⁾ HMC Balder or similar vessel

²⁾ Seven Artic or similar vessel

³⁾ Seafox Marinia or similar vessel

8.4.4 Environmental impacts from air emissions

In Table 8-10 a summary of the emissions from the different activities during the construction phase can be seen.

Table 8-10 Summary of the estimated emissions to air during the construction phase of the Hejre tie-back to South Arne concept.

| Construction phase | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVO C [ton] | CO ₂ -eq ¹⁾ [ton] |
|---|-----------------------|-----------------------|-----------------------|-----------------------|--------------|---|
| Pipelay | 5,790 | 106 | 7 | 0.2 | 7 | 5,796 |
| Installation of the Hejre topside and tie-in module at South Arne | 7,880 | 135 | 10 | 1.5 | 5.5 | 7,922 |
| Well completion | 18,635 | 142 | 20 | 1.45 | 13.2 | 18,676 |
| Total [ton] | 32,305 | 383 | 37 | 3.2 | 25.7 | 32,394 |

¹⁾ CO₂-eq is the total emission of CO₂ and CH₄. The global warming potential for CH₄ is 28 (IPCC, 2014)

Hejre is located offshore, and emission of SO_x and NO_x are not expected to contribute to the onshore health effects, while CO₂ emission has a global impact.

8.4.5 Risk assessment - Air emissions during construction

Based on the above and using the criteria described in chapter 7, it is assessed that the environmental risks related to air emissions is negligible or low depending on the type of component emitted (Table 8-11). Due to the characteristics of the greenhouse gases, they will contribute to global warming if emitted, and

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thus the probability of the impact is assessed to be highly probable. The impacts related to NO_x and SO_x are determined by the surrounding environment and thus are assessed to be low.

Table 8-11 Environmental severity and risk of impacts of air emissions during construction.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of air emissions (NO _x , SO _x) | Regional | Short term | Small | Minor impact | Low | Negligible |
| Impacts of air emissions (CO ₂ -eq) | International | Short term | Small | Minor impact | Highly probable | Low |

8.5 Impacts of underwater noise

During the construction phase, the following operations may generate underwater noise:

- Noise from the rigs and vessels for installation of a new topside at Hejre, tie-in module at South Arne and modifications to both Hejre and South Arne.
- Pipe laying using USBL, and pre- and post ROV installation survey using USBL and LBL.
- Machinery, dynamic positioning, propellers and thrusters of ships during the completion, modifications and installation operations.

8.5.1 Putting in place protection of untrenched parts of the pipeline by dumping rocks and concrete mattresses on the seabed over the pipeline. Impacts on marine mammals

Underwater noise may affect marine organisms in different ways. As cetaceans (whales, porpoises and dolphins) depend on the underwater acoustic environment for orientation and communication they are believed to be the marine organisms that are most sensitive to underwater noise. Seals and fish may, however, also be affected by underwater noise.

8.5.1.1 Potential impacts of underwater noise on marine mammals

The possible effects of underwater noise on cetaceans and seals include:

- **Hearing damage.** Intense underwater noise may damage hearing of cetaceans and seals. Loss of hearing is particularly serious for cetaceans because they use sound for communication, navigation and location of food. Seals may also lose hearing.
- **Behavioural reactions.** Underwater noise may cause avoidance reactions and other behavioural effects of cetaceans and seals, such as changes in surfacing, breathing and diving behaviour, cessation of feeding, aggression, aversion and panic (Dähne et al 2013, Thompson et al. 2010, Tougaard et al 2009, Southall et al 2007, Stone 2003). Behavioural impacts to acoustic exposure are generally variable, context-dependent, and less predictable than the effects of noise exposure on hearing.
- **Masking.** Because cetaceans depend on the underwater acoustic environment for orientation (echolocation) and communication an emitted cetacean sound can be obscured or interfered with (masked) by manmade underwater noise (Tougaard 2014); and
- **Vocalisation.** There are examples of whales changing their vocalisation because of underwater noise (IWC 2007, Weilgart 2007).

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The most used predictor for TTS and PTS is the sound exposure level (SEL), cumulated over a period of at least two hours. Guiding threshold values of sound exposure levels that may cause TTS or PTS or behavioural/avoidance reactions for harbour porpoise, white-beaked dolphin, minke whale and seals are presented in Table 8-12. These species have been assessed to be relevant for projects located in the North Sea (DCE, 2021). The National Marine Fisheries Service (2024) has published, new TTS and PTS threshold. These values will form the base of the update of guidelines on underwater noise from piling by DEA (DEA 2022) and is therefore included in Table 8-12 for comparison.

It can be seen that the threshold for onset of PTS (now called AUD INJ) is respectively 4 and 7 dB higher for harbour porpoise and dolphin, and that TTS is respectively 4 and 8 dB higher for harbour porpoise and dolphins. This means that the results of the modelling performed for this assessment based on the old values, are precautionary. Therefore, the results of the modelling are used knowing that the calculated ranges are likely to be too large, and hence worst case. In general, the harbour porpoise seems to be the most sensitive species to underwater noise. However, due to a lack of studies, it is precautionarily assumed that harbour and grey seals behaviourally react to the same levels of underwater noise as harbour porpoises.

Table 8-12 Sound exposure levels, that are harmful to cetaceans and seals. 'I-type sounds' are characterised by having a very fast onset, short duration and with a large bandwidth. This is typically regarded as impulse sounds. Sounds that do not fulfil these three characteristics are 'Other sounds' (Based on DEA 2022). The table is updated with relevant impulse values from NOAA Fisheries on which the updated DEA guidelines will be build. PTS is here termed AUD INJ. National Marine Fisheries Service (2024).

| Impact | I-type sounds SEL (cum) (dB re 1µPa2s) ² | Other sounds SEL (cum) (dB re 1µPa2s) ³ | I-type and other sounds SPL dB re 1 µPa |
|--|---|--|---|
| Harbour porpoise (very high frequency cetacean) | | | |
| Sound exposure level causing permanent threshold shift (PTS) | 155 (159*) | 173 | |
| Sound exposure level causing temporary threshold shift (TTS) | 140 (144**) | 153 | |
| Behavioural reactions | | | 103 |
| White beaked dolphin (high frequency cetacean) | | | |
| Sound exposure level causing permanent threshold shift (PTS) | 185 (193*) | 198 | |
| Sound exposure level causing temporary threshold shift (TTS) | 170 (178**) | 178 | |
| Minke whale (low frequency cetacean) | | | |
| Sound exposure level causing permanent threshold shift (PTS) | 183 (183*) | 199 | |
| Sound exposure level causing temporary threshold shift (TTS) | 168 (168**) | 199 | |
| Seals (Harbour seal and grey seal) | | | |
| Sound exposure level causing permanent threshold shift (PTS) | 185 (183*) | 201 | |
| Sound exposure level causing temporary threshold shift (TTS) | 170 (168**) | 181 | |

* Weighted AUD INJ onset (old PTS) as weighted cumulative sound exposure level over 24 hours ($L_{E,P,24\text{ h}}$) re 1 $\mu\text{Pa}^2\text{s}$. National Marine Fisheries Service (2024).

** Weighted TTS onset threshold (SEL24h). National Marine Fisheries Service (2024).

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Noise from acoustic equipment

The pre- and post-installation survey of the pipeline route is planned to be ROV based. The ROV surveys will take place along two longitudinal lines along the proposed pipeline route (Figure 5-8). Each line is expected to be approximately 33 km long, and each survey is expected to last about 1.5 days

The ROV pre- and post-installation surveys will use a number of acoustic instruments: an echosounder (ES), a multibeam echosounder (MBES), Doppler Velocity Log (DVL), Velocity Sensor (VS), Altimeter, Obstacle Avoidance Sonar (OAS) and Side Scan Sonar (SSS). All will be based on a frequency content above the hearing threshold of marine mammals (i.e. >180 kHz), and they will therefore not be described or assessed any further.

Trenching and cable/pipeline laying is assumed to employ Ultra Short Baseline (USBL) to make the correct positioning and depth of the pipeline and cable at the seabed. The cable and pipeline will be placed on the seafloor. Hereafter each will be trenched down. Trenching down is expected to take about twenty days in total for both pipeline and cable and is planned to take place in Q2 2028. During this time, the USBL system will be used to keep track of the work on the seabed. It is not yet known which USBL system will be used for the trench/underwater plough, and for this assessment it is assumed that the parameters of the USBL system for the cable laying will be the same as for the ROVs USBL system. An LBL (Long range Baseline) system will be used under installation of tie-in spools. This is performed following the pipeline trenching and is estimated to take a day for each pipeline end. The LBL grid will be 45 meters times 10 meters at Hejre and 35 meters times 10 meters at Syd Arne.

Use of USBL

The 3D position of the ROV will be determined with an USBL system. The planned USBL system will be alike a Kongsberg cNODE transponder and alike a Kongsberg HiPAP 501/502. The specification of this system is stated in Table 8-13. A USBL system send signals back and forth between the mother vessel and the ROV, and each transceiver and transponder emits a signal every 0.5 sec. The frequency content is between 20-30 kHz, where cetaceans and seals hear very well. A recent study from the North Sea documented effects of USBL pulses on presence of harbour porpoises and found that harbour porpoises disappeared for up to 3 hours following USBL pulses (Mikaelson et al. 2025). That study also calculated deterrence range based on recordings of USBL signals in the North Sea and the harbour porpoise behavioural reaction criteria of 103 dB SEL (see Table 8-12 above) and found that it varied between 1.1 and 5.5 km for the same USBL system and vessel. In this assessment the 5.5 km will precautionarily be used as the range for which harbour porpoises and all other marine mammals will be deterred.

Table 8-13 Specifications of the USBL and LBL systems planned for the pre-survey.

| Equipment (alike) | Type | Placement | Frequency (kHz) | Source level (SPL), dB re 1 mPa@1 m | Pulse duration (msec) | Repetition rate (Hz) | Directionality (°) |
|-------------------------|------------------|------------------|-----------------|-------------------------------------|-----------------------|----------------------|-----------------------|
| Kongsberg HiPAP 501/502 | USBL transceiver | Below the vessel | 20.5 - 29.6 | 189 (182 with directionality) | 30 | 0.5 | 180 |
| Kongsberg cNODE | USBL transponder | On ROV | 20 – 34 | 188 | 30 | 0.5 | 360 (omnidirectional) |
| Sonardyne ROVNav6 | LBL transceiver | On seafloor | 19 - 34 | 187–196 (4 Levels) | | | Omni-directional |

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Use of LBL

The LBL system is essentially the same as the USBL system, except that here, the transponders are deployed at the seabed emitting signals to the working vessel. LBL systems use networks of sea-floor mounted baseline transponders as reference points for navigation. These are generally deployed around the perimeter of a work site. The LBL technique results in very high positioning accuracy and position stability that is independent of water depth. It generally can reach a few centimeters of accuracy. LBL systems are generally employed for precision underwater survey work where the accuracy or position stability of ship-based (USBL) positioning systems does not suffice.

In the Hejre tie-back to South Arne Project the LBL system will be used for spool metrology, i.e. to perform an accurate survey of the distance between the installed pipeline end flange and the connecting platform riser. As part of the survey a network of transponders will be placed in a grid at seabed, and on a bracket mounted on the pipeline flange as well as on the riser flange. After placing the transponders, a number of distance measurements between all the different transponders are performed and these measurements are finally used to calculate (geometrically) the length and heading of the closing tie-in spool. These measurements will be used in the fabrication of the spool onshore, and subsequent installation offshore by divers, and therefore the accuracy of the spool geometry is of high importance.

Typically, an LBL array will consist of 5-6 transponders located at the pipeline flange and at the riser flange and in a grid between these flanges in order to obtain a number of distance measurements, which can be used to calculate the correct distance and angle between the riser and pipeline flange. The LBL grid will be 45 meters times 10 meters at Hejre and 35 meters times 10 meters at South Arne. A number of data sheets for potential instruments has been viewed and they are all rather similar in parameters. One example of LBL parameters for a potential LBL system for the project is shown in Table 8-13. The duty cycle and individual pulse/signal duration are not published in public datasheets and vary by command/data rate and environmental conditions, however a duty cycle of 5-10 ms is commonly for this application, similarly a pulse duration of 10-30 s is typical for a full LBL cycle (Open-Source Information).

For this assessment a modelling study was carried out to assess the potential for inflicting temporary or permanent hearing damages in marine mammals, i.e. TTS or PTS from USBL (INEOS, 2025). TTS and PTS can only be inflicted within the auditory range where a given species can hear, and it has therefore only been calculated for use of the USBL system, and not the other mentioned acoustic systems. The results are given in *Table 8-14*. Behavioural reactions for harbour porpoise and seals are based on Mikaelson et al. 2025 and are not modelled. The modelling was performed before the Mikaelson study was published. The distances stated in *Table 8-14* are thus the most conservative distance for potential impacts on marine mammals. For behavioural reactions, it's a moving 5.5 km zone, where animals are displaced and expected to reappear within hours after the vessel has moved on, based on Mikaelson et al, 2025. Since the parameters of the LBL and USBL systems are rather similar, the results for the USBL system also apply to the LBL system as a minimum, because there may be 1-2 more LBL units than the four USBL units (1 transceiver + 3 transponders) in the modelling study (*Table 8-14*). However, because mitigation will always be applied for both systems and with only one USBL or LBL unit to deter marine mammals before the systems are run in normal operation, the risk is functionally the same for both systems, because the risk of hearing impairment is reduced to 0 m following mitigation. And recall that the modelled ranges are precautionary based on the updated threshold values for onset of TTS and PTS (National Marine Fisheries Service 2024). For mitigation see chapter 8.5.1.2 and 8.5.1.3.

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Table 8-14 The results of the modelling show the impact distances for marine mammals using the USBL model HiPAP and 3 transponders, assuming that the animals will flee at 1.5 m/s from they hear the first pulse. (Low power setting, -18 dB). Impact threshold limits for marine mammals and associated impact distances regarding impulsive noise (cumulative noise (SELcum, weighted) and peak noise exposure (un-weighted)). LF =Low Frequency, HF = High Frequency, VHF = Very high frequency hearing, PCW =Phocid Carnivores hearing in water. (INEOS, 2025)

| Marine Mammal Group | TTS SELcum (weighted)* | TTS peak (unweighted)** | PTS SELcum dB re 1 mPa ² s (weighted)* | PTS Peak (unweighted)** | Behaviour *** |
|-----------------------------------|------------------------|-------------------------|---|-------------------------|-------------------------------------|
| Minke Whales, LF, distance | 0 m* | 0 m ** | 0 m * | 0 m** | 50 m (transducer) |
| White-beaked dolphin HF, distance | 0 m* | 0 m ** | 0 m * | 0 m** | 50 m (transducer) |
| Harbour porpoise, VHF, distance | 1700 m | 0 m | 180 m | 0 m | 5500 m**** (transducer/transponder) |
| Seals, PCW distance | 0 m | 0 m | 0 m | 0 m | 5500 m**** (transducer/transponder) |

*DEA, 2022

** Southall et al, 2019 Marine mammal exposure criteria

*** Russell 2016

**** Mikaelson et al. 2025.

The total duration for the use of LBL and USBL is expected to be around 25 days.

Noise from vessels, rigs rock dumping and dynamic positioning system (DP)

All vessels and rigs intended used in this project emit underwater noise that may deter marine mammals. For all vessels within 500 m of a platform, it is mandatory to use a dynamic positioning system (DP). A DP system keeps the vessel in place with the help from GPSs to inform the bridge of the vessel's exact position with regards to the platform. The vessel is then kept in position by use of thrusters that may be placed both in the stern, bow and midway on the vessel. The DP system may be manually adjusted by the captain or fully autonomous.

The DP system is mandatory and cannot be mitigated except as explained below in section 8.5.1.2 by beginning to test thrusters before entering the 500 m zone. Based on harbour porpoises' reactions to vessel noise in general (Bas et al. 2017; Wisniewska et al. 2018) the noise of the thrusters will deter at least harbour porpoises.

Rock and matrass dumping also create underwater noise. Both the vessels that will likely need thrusters to stay at the right position, and from the rocks impacting the seafloor. A recent assessment of effects of artificial reefs on harbour porpoises concludes that the main noise source during rock dumping is the vessel, thrusters and activity on the vessel, and less the actual stones impacting the seafloor. Based on the harbour porpoise behavioural reaction criteria of 103 dB re 1 μ Pa VHF-weighted (Table 8-12), they estimate a deterrence range of about 700-1200 m, and that the impact on harbour porpoises for a short period of rock duping in the North Sea is minor (Sveegaard, Teilmann, & Tougaard, 2024).

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A number of scientific studies have been conducted on the reactions of harbour porpoises to vessel noise. It is therefore known that harbour porpoises' echolocation is masked by high-frequency noise (Hermannsen et al., 2025), and that high-frequency noise is emitted at relatively high levels from a wide range of ship sizes from very small leisure crafts to large tankers (Hermannsen et al., 2014). In captivity, experiments have been conducted on four harbour porpoises that were exposed to recordings of ship passages with medium to high-frequency noise at low levels. All harbour porpoises reacted with strong stereotyped reactions at levels corresponding to distances of approximately 1 km from the ships (Dyndo et al., 2015). In the wild, acoustic data loggers have been attached to wild harbour porpoises, and their behaviour and foraging have been monitored while they swam freely and naturally in parts of Danish waters, which are heavily trafficked. Here it was seen, that despite the fact that harbour porpoises hear ship noise 17-89% of the time, they reacted strongly to high noise levels. The behavioural changes consisted, among other things, of stopping foraging (Wisniewska et al., 2018). In the Black Sea, harbour porpoises have been seen to show behavioural reactions to ships at an average distance of approximately 400 m. Here, the animals stopped what they were doing, whether it was foraging, sleeping, moving, etc., and changed their behaviour (Bas et al., 2017).

Since harbour porpoises have a very high metabolism, it is problematic for them to be interrupted in their foraging, especially in the period September - February, when they increase their blubber layer for the winter and the females are simultaneously pregnant and/or lactating (Gallagher et al., 2021; Rojano-Doñate et al., 2018). This is especially problematic if harbour porpoises are disturbed over long periods in very important habitat used for foraging or deterred entirely from such areas over long periods to areas with insufficient prey. In the case of the Hejre project the disturbance is over a small area and very short period, and it is not in specifically important habitat (Waggit et al. 2019, Gilles et al. 2016, Stockholm, 2025 and Sveegaard et al. 2018). Further, the activity of disturbance with USBL/LBL take place from May to October, and the disturbance is therefore assessed as a minor impact. The cetaceans can move back into the area and continue using it as before when the cable-laying is done, since the activities is not assessed to kill individuals or reduce the population size.

Vessel noise cannot be mitigated, and behavioural reactions are to be expected in harbour porpoises to a range of 400-1000 m from each vessel based on the above. The same is assumed the case for all other marine mammals that occur in the area. However, the vessel moves continuously, and it is therefore a moving zone of exclusion, and not the entire 33 km pipeline from which the animals are repelled.

8.5.1.2 Mitigation of the USBL system

Given that the USBL system has been modelled to inflict both TTS and PTS in harbour porpoises, a mitigation approach in the shape of a *slow start* has been developed (INEOS 2025) to reduce the risk of TTS or PTS. The slow start has been calculated by modelling. In the modelling it is assumed that the harbour porpoises are some 100 m away when they hear the first pulse, as they are deterred from vessels. 100 m is therefore the first distance at which the USBL signal is assumed heard. This is rather precautionary, as harbour porpoises are likely deterred by the vessel noise itself to a range of 400-1000 m from the vessel in the first place. The USBL is run with the lowest possible source level. From hearing the first pulse, it is assumed that harbour porpoises begin fleeing at an assumed 1.5 m/s perpendicular to the direction of the vessel. Further, the modelling takes into account the harbour porpoise hearing threshold (Table 8-12) and the source level and frequency content of the USBL system as well as the range at which receiving the pulse may lead to TTS (Table 8-13). The calculation looks as follows:

$1,700\text{m (distance of TTS)} - 100\text{ m (deterrence by vessel testing thrusters)}/1.5\text{ m/s (flee rate)} * 20\% \text{ safety margin} = 21.3 \text{ minutes slow start.}$

From this calculation it follows that slow start playing out signals at the lowest possible level, and only from the vessel, every 30 s for 22 minutes before the USBL system is run in its normal state, can be carried out

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without damaging harbour porpoise hearing, and at the same time deterring them from the area (INEOS 2025).

It is assumed that harbour porpoises, and other marine mammals, will leave the area once they begin hearing the USBL pulses, which the Mikaelson et al. 2025 study also suggests. This slow start procedure will therefore decrease the risk that harbour porpoises and other marine mammal species are exposed to levels that could inflict TTS or PTS. The behavioural reactions cannot be mitigated for any species and are instead utilised to reduce the risk of hearing impairment.

It is further suggested to begin the slow start as the vessel is approaching the 500 m safety zone of the platform from which the pre-and post-pipeline installation survey and cable laying will commence. Entering this zone, the vessel must conduct a dynamic positioning test. The DP system is required for safety, working so close to oil and gas platforms. The mitigation procedure is suggested as follows (INEOS 2025):

As part of the standard procedure, the DP system of the vessel will be tested in a DP trial before entering the safety zones. During DP trials, the underwater noise will be generated by thrusters such as:

- 2x Rolls Royce Kamewa 700 kW bow thrusters, and
- 2x Rolls Royce Aquamaster 1500 kW stern thrusters
- During the DP trial the “slow start” procedure will be initiated by activating the USBL transceiver at the lowest level.
- Vessel arrival outside safety zone and set-up on DP. To ensure that there are no marine mammals within 100 meters of the vessel there will be a test of the DP thrusters on the vessel for two minutes prior to the onset of the slow start procedure of the USBL vessel unit.
- USBL pole lowered into water
- “Slow start” initiated: 1 USBL activated in USBL topside software (no actual transponder placed in the water). The USBL unit emits sonar pulses every 30 seconds for 22 minutes. Low power mode setting, and beam width will remain the same during the entire slow start operation.
- Vessel commences DP trials/checklist while “slow start” ongoing.
- Vessel moves inside safety zone while “slow start” is ongoing
- Operations continue as normal.
- If the operation is discontinued for more than 20 minutes the slow start procedure will be repeated

Following the slow start, the risk of hearing impairment is reduced to an assumed 0 m, as all harbour porpoises have had time to, and are here assumed to have left the area before the USBL is operated in normal mode (*Table 8-15*). It is likely that also dolphins, minke whales and seals respond similarly, but this has not been modelled, as harbour porpoises are the most sensitive species.

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Table 8-15. Impact ranges following mitigation in terms of slow start.

| Marine Mammal Group | TTS SELcum (weighted)* | TTS peak (unweighted)** | PTS SELcum dB re 1 mPa2s (weighted)* | PTS Peak (unweighted)** | Behaviour*** |
|---------------------------------|------------------------|-------------------------|--------------------------------------|-------------------------|--------------|
| Harbour porpoise, VHF, distance | 0 m | 0 m | 0 m | 0 m | 5,500 m |

*DEA, 2022.

** Southall et al, 2019 Marine mammal exposure criteria.

*** Mikaelson et al. 2025.

8.5.1.3 Mitigation of the LBL system

Mitigation of the LBL units will be performed from the vessel, from where the LBL units on the seafloor can be controlled. It will be performed as for USBL with one unit, but over 30 minutes with a duty cycle of 1 signal per 0.5 minute to allow animals to leave the area. The 30 minutes are chosen as a precautionary measure since there are six LBL units working at the same time, as opposed to the four USBL units. But recall that the modelling values are precautionary based on the updated threshold values for onset of TTS and PTS (National Marine Fisheries Service 2024).

8.5.1.4 Assessment of impact from use of USBL and LBL

Based on the above considerations, the potential impacts from the pre- and post-installation surveys of the pipeline route, the laying of the pipeline and cable and the spool metrology are assessed to be fully reversible and short term (<30 days in total) because mitigation is employed. By employing mitigation, the risk of inflicting hearing impairment in marine mammals are assessed to be reduced significantly.

Annex IV-species have specific protection requirements including prohibition of all forms of deliberate capture or killing of these species in the wild, deliberate disturbance of these species particularly during the period of breeding, rearing and migration and deterioration or destruction of breeding sites and resting places.

From Article 12(1) of the Habitats Directive it follows that activities must not result in

- (a) deliberate capture or killing of an Annex IV species.
- (b) deliberate disturbance of an Annex IV species within its natural range, particularly during periods when the animals are breeding, caring for their young, hibernating, or migrating.
- (c) deliberate destruction or collection of eggs in the wild.
- (d) damage to or destruction of breeding or resting sites within the natural range.

The prerequisite is that the ecological functionality of a breeding or resting site for Annex IV species is maintained at least at the same level as previously.

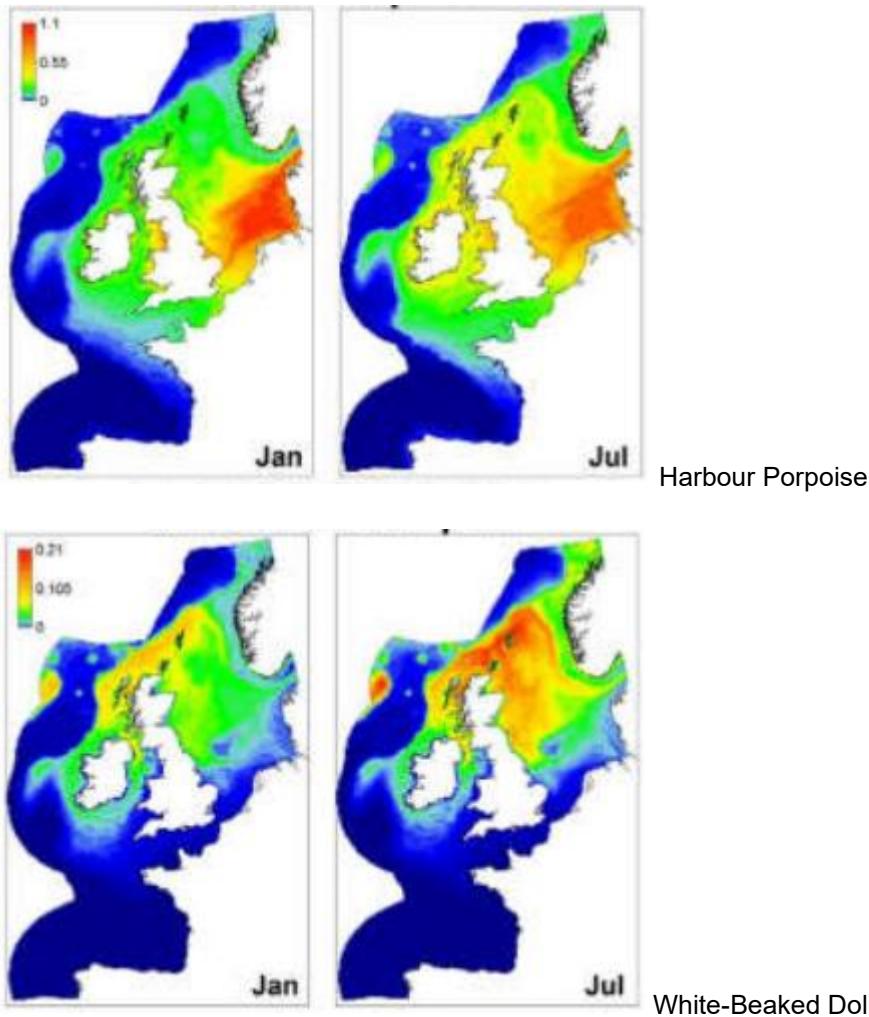
“Deliberate” actions are to be understood as actions carried out by a person or authority who knows that their action is likely to lead to an infringement against a species, but nevertheless intends to commit this infringement, or at least consciously accepts the expected outcomes of their actions (European Commission, 2021). Deliberate disturbances are assessed in this context in the following.

Cetacean Annex IV-species of relevance in the Danish North Sea include the harbour porpoise, the white-beaked dolphin and the minke whale (DCE, 2021).

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The hearing of harbour porpoise and white-beaked dolphin are respectively very high frequency and high frequency. Calculations of TTS and PTS for seals, harbour porpoises, white-beaked dolphins and minke whales are shown in Table 8-12 (INEOS 2025). After the modelling was performed, the first audiogram of a minke whale was published and showed that minke whales can hear frequencies up to 90 kHz (Houser et al. 2024). For this assessment it is therefore precautionarily assumed that minke whales will react to USBL signals at the same range as harbour porpoises, however this has not been verified with studies. Oppositely this means that the mitigation employed for harbour porpoises will also work for minke whales if they are deterred (Table 8-12).

The distribution of the harbour porpoise, the white-beaked dolphin and the minke whale in the North Sea has been modelled by Waggit et al. 2019 (Figure 8-2). The harbour porpoise is the most common marine mammal in Danish waters and harbour porpoises in the project area are expected to belong to the North Sea Population. The white-beaked dolphin is typically found in the northern part of the North Sea, while the minke whale is found in both the central and northern part of the North Sea, particularly during the summer (Figure 8-2). The populations of harbour porpoises, white-beaked dolphins and minke whale in the North Sea are all assessed to be in favourable conservation status (DCE, 2021).



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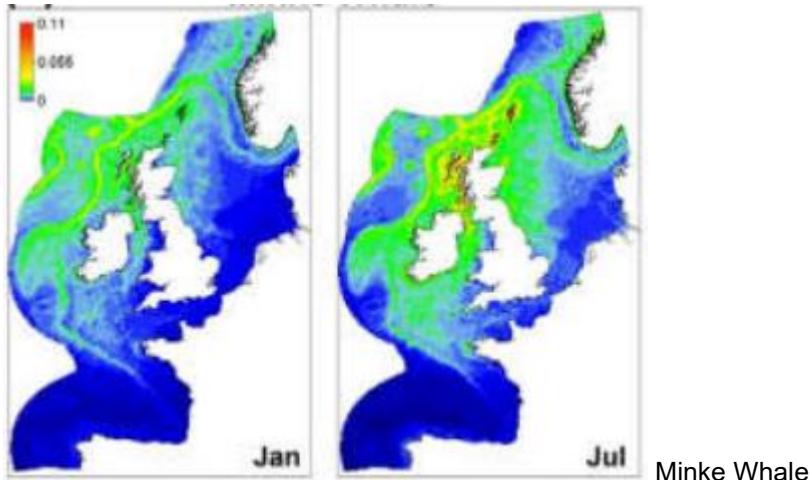


Figure 8-2 Modelled spatial distribution in animals per km² in January and July in the North-East Atlantic for harbour porpoise, white-beaked dolphin and minke whale. Note a different colour gradient used for each species. From Waggit et al. 2019.

The offshore activities at Hejre are expected to take place between January and May 2027 for the well perforation and clean-up, and within the weather window from March to October 2028 for the remaining offshore activities. The noise from the rigs, machinery, etc. will take place within these periods. The pipeline activities, including pre- and post-installation survey, trenching, pipelay and rock dumping are expected to take place between March and May 2028.

Cetaceans are probably most sensitive to potential impacts from underwater noise during the period where they mate, deliver the calf and the initial nursing. Harbour porpoises mate during July-September, deliver during the spring and summer with a peak in June. White-beaked dolphins mate during May-August and give birth during the summer. Minke whales mate and deliver during late winter to early spring.

The harbour porpoise and white-beaked dolphin breed during part of the weather window for the activities from April to September. No breeding areas have been established for neither the harbour porpoise nor the white-beaked dolphin, but calves have been observed throughout the North Sea during the SCANS' surveys (Hammond et al 2002, Hammond et al. 2013, Hammond et al. 2017, Gilles et al. 2023) and high percentages of harbour porpoise mother-calf pairs were for example observed in the Danish North Sea in the pre-investigation area for the North Sea Energy Island (Kyhn et al. 2024a). DCE has recently assessed the North Sea with regards to where harbour porpoises are sensitive to underwater noise from offshore wind, and points to the area of Hejre as of medium sensitivity. This relates to the density of animals in the area (Stokholm et al. 2025). From a precautionary approach breeding may take place in the vicinity of the project area. It is noted that the implementation of slow start will allow the cetaceans to flee the area and thus reduce the potential for permanent and temporary threshold shifts significantly, so that no individuals will be harmed. Individuals will hence be deterred from the activities of this project within some maximum 5.5 km based on best available knowledge, and the behavioural reactions cannot be mitigated. However, these behavioural reactions are not considered *deliberate disturbance* because they are short term and take place in an area that is not of specific importance for breeding, resting or migration, because the activities take place in a limited impacted area that is not considered particularly important for any of the cetacean species in the North Sea, nor is a known breeding site. Further, in combination with implementation of a slow start, the disturbance is short-term and fully reversible within hours, and it is assessed that the ecological functionality of the area for these marine mammals will not be impacted.

For the minke whales, they are for this assessment assumed to be equally sensitive to noise from USBLs/LBLs as harbour porpoises, as recent measurements of minke whale hearing have showed that they are sensitive to noise up to 90 kHz (Houser et al. 2024). Surveys counting marine mammals have only been

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conducted in the North Sea during Spring-Autumn and predominantly in Summer, where all SCANS surveys have been conducted (Hammond et al 2002, Hammond et al. 2013, Hammond et al. 2017, Gilles et al. 2023). Incidental sightings from oil and gas platforms have shown that minke whales are often sighted around the platforms (Delefosse et al. 2017), but mostly in Summer. This most likely means that they are too difficult to observe in Winter where the days are short and often dark, and the weather not conducive for observing small fins in surface, and it must be assumed they are present year-round. As they are assumed to mate and deliver during late winter to early spring, it is not likely, that minke whales will be impacted by the activities during their most sensitive periods, as the pre- and post-installation surveys and cable laying will be conducted in second quarter of the year.

It is assessed that the project activities will not cause deliberate disturbance, a deterioration or destruction of breeding or resting sites for the Annex IV-species as the disturbance take place in a limited area that is not considered of specific importance for breeding, resting or migration for minke whales, nor is a known breeding site. Further, in combination with implementation of a slow start, the disturbance is short-term and fully reversible within hours, and it is therefore assessed that the ecological functionality of the area for minke whales will not be impacted.

Noisy activities besides from USBL/LBL during completion, installation of remedial cement plug in well, installation of topside and laying of pipelines are all expected to exceed the threshold for triggering avoidance and other behavioural impacts of harbour porpoise, which react at very low levels (see Table 8-12). Harbour porpoises have been shown to react to low levels of vessel noise in several studies (see above). However, field studies around the drilling rig *Noble Koskaya* and its support vessel *Northern Seeker* in the German sector of the Doggerbank showed that harbour porpoises were present within a few hundred meters of the rig. The rig was stationary and fixed to a platform, and in that sense different than a moving vessel. (Todd et al. 2009).

It is concluded that the project activities at Hejre and South Arne is not expected to exceed the sound exposure levels that are harmful to cetaceans and seals following the proposed mitigation for each start-up of USBL or LBL systems, in the shape of a 22 or 30 minutes, respectively, slow start with a USBL ping from the mother vessel every 30 s. The project activities are expected to have a local impact only due to the described activities. The impact is assessed to result in potential avoidance by marine mammals of the area within some 5.5 km of the USBL/LBL activities. This zone moves with the working vessel, or is stationary for the LBL, and animals return within hours after the vessel has moved on. It is hence not the entire 33 km pipeline route, from which the animals are deterred, but a moving 5.5 km zone. The site is not assessed to be an important area for marine mammals (Stokholm, 2025), although marine mammals may be present and utilise the area, and as the impact is expected to be temporary within the moving 5.5 km (<3 hours) and local (<5.5 km) the overall impact is assessed to be insignificant. The total amount time a USBL will be used is app. 25 days during construction and the impacts are therefore short-term. The cetaceans can move back into the area and continue using it as before when the cable-laying is done, since the activities is not assessed to kill individuals or reduce the population size. The project activities are expected to take place within the weather window from March to October. But because hearing impairment will be mitigated and because the behaviourally effects are fully reversible within hours, this impact assessment is expected to be valid regardless of when the project activities take place during the weather window.

8.5.2 Impacts on fish

It has been demonstrated that fish, fish eggs and fish larvae may be injured by sudden exposure to loud underwater noise. It has for instance been observed that swim bladder damage occurred in adult anchovies at high sound levels (OSPAR Commission 2009). Noise levels from ramming activities and the potential effects on fish has previously been assessed and the noise levels that may cause effects are shown in Table 8-16. Note however, that these levels should serve as a guideline only, as they are based on ramming activities, which are not part of this project.

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Table 8-16 Levels of underwater noise that have been reported to harm fish, fish eggs and fish larvae (Andersson et al. 2017). These levels are based on ramming activities.

| Effect | $SPL_{(peak)}$ (dB re 1 μ Pa) ¹ | $SEL_{(ss)}$ (dB re 1 μ Pa ² s) ² | $SEL_{(cum)}$ (dB re 1 μ Pa ² s) ³ |
|---|---|--|---|
| Risk of serious injuries of inner organs or risk of death | ≥ 207 | ≥ 174 | ≥ 204 |
| Damage of fish eggs and fish larvae | ≥ 217 | ≥ 187 | ≥ 207 |

1) $SPL_{(peak)}$ = Sound Pressure Level= Maximum overpressure generated by ramming.

2) $SEL_{(ss)}$ = Sound Exposure Level (Single Strike) = Sound energy level emitted during a single ramming strike.

3) $SEL_{(cum)}$ = Sound Exposure Level (Cumulative) = Cumulative sound energy level emitted during several ramming strikes over a certain period.

Fish has also been observed to flee from underwater noise (avoidance reaction) or to alter behaviour such as changing of swimming speed and/or swimming direction or to show “freeze” reaction (i.e., a reaction in which the fish suddenly stops swimming) (Mueller-Blenke et al. 2010).

However, the literature provides an ambiguous picture of the reaction of fish to underwater noise (Table 8-17). Some species flee from noise and others do not react to noise. There is even evidence that some species are attracted to noise (Nedwell et al. 2004). Field studies have shown that several species of fish may be disturbed by noise from passing vessels and they may flee from the vessel while other species are not affected (Freon et al. 1993). It has also been demonstrated that species, which normally would flee from vessel noise can adapt to frequent noise and become unaffected (Steward, 2003). Some studies also indicate that fish which are exposed to high levels of noise may stay in an area, if it is an important feeding or spawning ground (Wardle et al. 2001, Pena et al. 2013).

Table 8-17 Levels of underwater noise that has affected the behaviour of fish in laboratory experiments.

| Effect | SPL (dB re 1 μ Pa) | $SPL_{(peak)}$ (dB re 1 μ Pa) ² | $SEL_{(ss)}$ (dB re 1 μ Pa ² s) ³ | Ref. |
|--|-----------------------------|---|--|-----------------------------|
| Changes of behaviour ¹⁾ observed for cod | | 140 - 161 | | Mueller –Blenke et al. 2010 |
| Changes of behaviour ¹⁾ observed for sole | | 144 - 156 | | Mueller –Blenke et al. 2010 |
| Changes of behaviour observed for sprat | | | ≥ 135 | Hawkins et al 2014 |
| Avoidance reactions of herring | 122 - 138 | | | Blaxter, and Hoss 1981 |

1) Changing of swimming speed and/or swimming direction or “freeze” reaction, in which the fish suddenly stops swimming.

2) $SPL_{(peak)}$ = Sound Pressure Level= Sound Pressure Level= Maximum overpressure generated by ramming.

3) $SEL_{(ss)}$ = Sound Exposure Level (Single Strike) = Sound energy level emitted during a single ramming strike.

The fact that offshore drilling rigs and platforms in general attracts fish and that the abundance and diversity of fish may be higher than the surrounding waters indicate that noise from the rig generally do not disturb fish (Løkkeborg et al., 2002, Soldal et al., 2002, Fabi et al., 2002, Stanley & Wilson 1997, Love et al., 2000) or that the advances of an artificial reef is larger than the disadvantages of the noise.

Potential impacts are only expected in the immediate vicinity of the project activities. As the noisy activities are insignificant, local, and temporary and will not affect fish populations, the impact is assessed to be insignificant. The project activities are expected to take place within the weather window from April to September. According to Table 6-8 several fish species may spawn during this period, which is especially relevant for the species that exhibit high spawning activities within the project area, e.g. lemon sole (*Microstomus kitt*)

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and mackerel (*Scomber scombrus*). However, no impacts are expected due to the overall negligible impact caused by the expected local impact during a short period of time.

8.5.3 Risk assessment - Underwater noise

Based on the above and using the criteria described in Chapter 7.1, it is assessed that the environmental risks related to underwater noise generated during installation of a new topside at Hejre, modifications to both Hejre and South Arne and pipe laying including pre-installation survey, in addition to noise from support vessel activity is **Negligible** (Table 8-18).

Table 8-18 Environmental severity and risk of impacts of underwater noise generated from the activities at the rigs, pipe laying and support vessel activities.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------|--------------------|---------------------|--------------------------------------|-----------------------|--------------------|
| Impacts of noise from rig | Local | Short term | Small | Insignificant impact | Highly probable | Negligible |
| Impacts of pre- and post-installation survey – underwater noise | Local | Short term | Small | Insignificant impact with mitigation | Highly probable | Negligible |
| Impacts of underwater noise from support vessels | Local | Short term | Small | Insignificant impact | Highly probable | Negligible |
| Impact of noise from USBL/LBL during pipeline and cable laying | Local | Short term | Small | Insignificant impact with mitigation | Highly probable | Negligible |

8.5.4 Risk assessment of underwater noise on European sturgeon

The European sturgeon, as an Appendix IV species, is considered independently in the assessment below. There is a notable lack of published research examining the impacts of underwater noise on sturgeons overall, and specifically on European sturgeons. Popper & Calfee (2023) provide a comprehensive overview of the available studies concerning sturgeon hearing and their responses to human-generated sound. Given Arthur N. Popper's status as a leading authority on fish auditory systems and their responses to underwater noise, this review serves as the foundation for evaluating the potential effects of underwater noise from the Hejre project on European sturgeons.

The review's findings indicate that sturgeons, including the European sturgeon, are capable of hearing frequencies up to approximately 1 kHz, with optimal hearing sensitivity around 50 Hz. Furthermore, it is highly probable that sturgeons detect only particle motion, rather than sound pressure, unlike some other fish species that utilise the swim bladder for this purpose. The ability to sense sound pressure developed later in fish evolution in species with auxiliary structures such as the swim bladder, which converts pressure changes into particle motion. Like other benthic species, sturgeons can also perceive signals transmitted through the substrate.

Sturgeons are able to detect the sounds produced by passing vessels, but they are unlikely to perceive USBL signals, as these are emitted at frequencies well above the sturgeons' hearing range.

Nevertheless, extremely loud underwater noises can still harm fish that possess a swim bladder, even if they cannot hear the sound itself. Such intense vibrations can affect the swim bladder, and if strong enough, may lead to ruptures or damage to adjacent organs like the liver and kidney.

Research on sturgeon behavioural responses to underwater noise is limited. One study tracked Atlantic sturgeons acoustically and found that individuals avoided areas where pile driving was taking place, only

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returning once the activity had ceased. This research was conducted in the Hudson River, but it was unclear whether the sturgeons responded to particle motion in the water or through the substrate (Krebs, Jacobs, & Popper, 2016). Another investigation (Balazik et al., 2020) examined how Atlantic sturgeons reacted to dredging operations and found no significant changes in movement patterns. However, the study did not measure sound levels, making it impossible to determine if the noise was detectable to the sturgeons in terms of particle motion. Notably, since European sturgeons spawn exclusively in rivers, their eggs and larvae would not be impacted by the Hejre project.

Based on the information above, it is likely that European sturgeons can detect and respond to the process of laying cables on the seabed, as this activity generates vibrations that sturgeons are able to perceive. It is also probable that any sturgeons present in the vicinity would temporarily leave the area during cable-laying operations and return once the work is completed, which aligns with observed behaviour in response to the much more intense disturbance of pile driving—where sturgeons returned after the activity ceased. These behavioural reactions are not considered deliberate disturbance in an area of special importance for breeding, resting or migration, because the activities take place in a limited impacted area that is not considered particularly important for European sturgeons that is a predominantly coastal species. The sturgeons can move back into the area and continue using it as before when the cable-laying is done, since the activities is not assessed to kill individuals or reduce the population. Further it is not a breeding site, as sturgeons are anadromous and strictly breed in rivers. It is considered unlikely that European sturgeons would be affected by USBL or LBL systems, since these devices emit signals in the 20–60 kHz range, which is well above the sturgeons' hearing threshold.

The overall assessment is shown in Table 8-19 below.

Table 8-19. Environmental severity and risk of impacts of underwater noise generated from the activities at the rigs, pipe laying and support vessel activities on European sturgeon.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------|--------------------|---------------------|--------------------------------------|-----------------------|--------------------|
| Impacts of noise from rig | Local | Short term | Small | Insignificant impact | Unlikely | Negligible |
| Impacts of pre- and post-installation survey – underwater noise | Local | Short term | Small | Insignificant impact with mitigation | Unlikely | Negligible |
| Impacts of underwater noise from support vessels | Local | Short term | Small | Insignificant impact | Unlikely | Negligible |
| Impact of noise from USBL/LBL during pipe-line and cable laying | NA | NAa | NA | NA | NA | NA |

8.6 Impacts of airborne noise and artificial light

The installation of a new topside at Hejre and the modifications to both Hejre and South Arne will increase the artificial light and airborne noise emissions

It is expected that the artificial light and noise emissions will take place 24 hours a day and the project sites will be illuminated during the dark hours. The rigs must be continuously lit to enable work to be carried out properly and to ensure the safety of the crew. The platforms must also be properly equipped with navigation lights to alert ships and aircraft. Furthermore, flaring during clean-up of wells produces a horizontal flame, that causes substantial light emissions. In clear weather, this flame may be visual from up to 10 km from the platform. Naturally, this effect is stronger at night than during the day.

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Artificial light may affect seabirds and migration of land birds in different ways, both positively and negatively.

8.6.1 Positive effects of artificial light

At night lights and flares may be beneficial for foraging gulls because they attract prey to the surface waters (zooplankton and/or small fishes). Lights from offshore platforms may thus create additional foraging opportunities for gulls that normally forage by daylight, thus supplementing their diets and, potentially, increasing their survival and reproductive success (Ronconi, Allard and Taylor 2015, Tasker et al., 1986).

8.6.2 Negative effects of artificial light

Artificial light at sea may attract certain species of birds especially during bad weather and overcast nights. There are examples that illumination from offshore platforms under such circumstances can attract and disorient the birds and have a trapping effect that leads birds to circle around the light source. In particular, this is the case for migratory songbirds, waders, ducks, and geese, not so much by the light source's intensity, but by specific spectra within the light source (Deda et al. 2006, Van De Laar 2007). The circling behaviour may reduce their energy reserves and especially for migrating songbirds making them unable to cross the North Sea.

Reports of attracted birds, which collide with the platform and are killed or incinerated in the flare are also known. For migrating land birds, early reports highlighted rare events where hundreds or thousands of birds were incinerated in flares, though dedicated "flare watches" at other platforms observed no direct mortality. Information on mortality rates associated with collision and incineration of seabirds remains uncertain. One study has estimated annual rates of mortality in flares to be in the range of "a few hundred birds per platform per year" (Ronconi, Allard and Taylor 2015). Another study concluded that although incineration of birds in flares occur in the North Sea, such incidences are probably infrequent and are ultimately the result of weather phenomena driving migratory birds off course to begin with (Bourne 1979).

8.6.3 Impacts of airborne noise on birds

It is expected that additional noise will be generated during the construction phase. This has the potential to temporarily disturb seabirds locally. However, as this potential impact is expected for a limited number of birds, it is expected that this will in no way impact seabird population.

8.6.4 Risk assessment - Artificial light and airborne noise during construction

Based on the above and using the criteria described in Chapter 7, it is assessed that the environmental risks related to artificial light during construction will have a **positive** effect in terms of improving foraging opportunities for seabirds. Impacts related to collision of birds is **negligible** (Table 8-20). Some loud noise will be generated during the construction phase that will temporarily disturb seabirds locally. The environmental risk is **negligible**.

Table 8-20 Environmental severity and risk of impacts of artificial light during construction.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|--|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Improvement of night foraging opportunities for seabirds | - | - | - | - | - | Positive effect |
| Risk of bird collision due to light attraction | Local | Short term | Medium | Minor impact | Low | Negligible |
| Risk of disturbance of birds due to noise | Local | Short term | Very low | Insignificant | Medium | Negligible |

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8.7 Impacts of waste

All waste generated during all project phases at Hejre and South Arne will be transported to Esbjerg by vessel. The waste will be further sorted out to improve recycling, sent for further treatment at approved waste treatment plants, for combustion or for final disposal.

OBM, chemicals and cuttings will be transported onshore for treatment and disposal

The main impact related to the waste is associated with the air emissions for transporting it to sites on-shore. This is accounted for in Section 8.4. The waste treatment onshore will not have an impact on the marine environment. Risk related to waste is shown in Table 8-21.

Table 8-21 Risk related to waste from both Hejre and South Arne during construction.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|------------------|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of waste | Regional | Long term | Small | Minor impact | Very low | Negligible |

8.8 Impacts on cultural heritage

The laying of the pipeline (described in Chapter 5) may potentially damage cultural heritage. The only cultural heritage that potentially could be affected in the project area are ship and plane wrecks. There are no registered wrecks in the project area, and the area is generally not a hot spot for shipwrecks. Potential findings of wrecks or other historical artifacts identified during site investigations will be reported to the Palace and Culture Agency. The pre-installation survey on the pipeline route may also pick up wrecks if present.

Based on the arguments above the environmental risk related to cultural heritage is assessed to be negligible.

Table 8-22 Risk related to damage of cultural heritage during construction.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|------------------|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Damage of wrecks | Local | Permanent | Small | Minor impact | Very low | Negligible |

8.9 Impacts on hydrography

The substructure of the rig for the well perforation and clean-up activities will be temporary located in the water column. The legs are placed in an open structure and are considered too small to have any impact on the hydrography of the North Sea. In addition to that the rig will be placed in the location temporarily as it is expected the rig will operate for around 100 days.

Based on the arguments above the environmental risk related to hydrography is assessed to be negligible.

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Table 8-23 Risk related to damage of cultural heritage during construction.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|--------------------------|---------------------|--------------------|---------------------|----------------------|-----------------------|--------------------|
| Impacts on seabed | Local | Short term | Small | Insignificant impact | Low | Negligible |
| Impacts on water column | Local | Short term | Small | Insignificant impact | Low | Negligible |
| Impacts on benthic fauna | Local | Short term | Small | Insignificant impact | Low | Negligible |

9. Environmental impacts of planned activities during the production phase

9.1 Potential impacts

Figure 9-1 and Table 9-1 provide an overview of the potential effects during the production phase, which are assessed in the present impact assessment. Effects from discharges and emissions related to host platform concerns only the increase caused by the production at Hejre.

This chapter deals with environmental impacts of planned activities during the operation phase. Environmental impacts of accidental spills during the operation phase are dealt with in chapter 11 and socioeconomic impacts are described and assessed in Chapter 13.

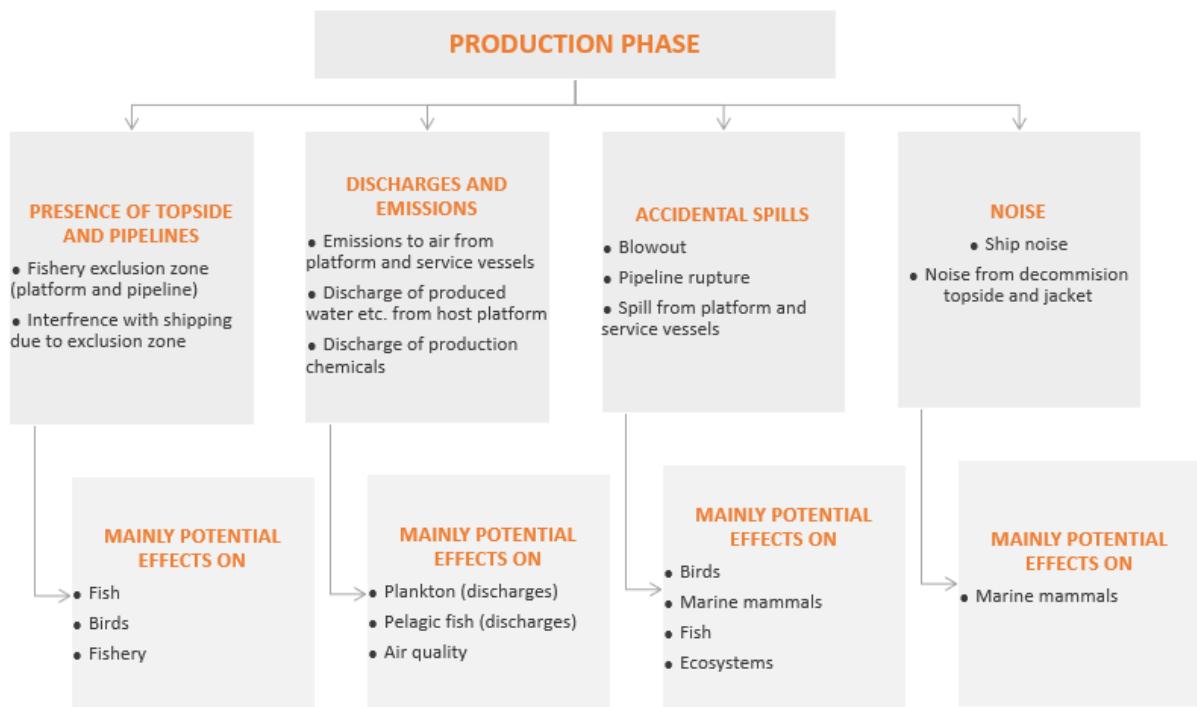


Figure 9-1 Overview of impacts during the production phase assessed in the EIA.

Table 9-1 Overview of impacts during the production phase assessed in the EIA

| Activity | Potential Impacts |
|--|---|
| Presence of structures Platform, including 500 m safety zone and pipeline including 200 m exclusion zone | Interference with shipping due to safety zone |
| Discharges and emissions Discharge of produced water from Hejre (at discharge point on South Arne) Emissions to air | The discharge may affect marine organisms, particularly pelagic organisms such as plankton including fish eggs and larvae Release of particulates and gaseous compounds (SO _x , NO _x , VOC, CO, CO ₂ , CH ₄) from generators, compressors and other machinery on the production platform (South Arne) and due to flaring operations |

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| Activity | Potential Impacts |
|--|---|
| Underwater noise | Inspection and maintenance of the Hejre platform, cables, pipeline etc may require use of vessels and ROV with USBL, noise types that may cause TTS, PTS and deterrence. |
| Accidental spills | |
| Blowout | Extremely rare events. Experience from previous blow outs and oil spills at sea have shown that it is mainly birds, marine mammals, fish, coastal ecosystems, fisheries, aquaculture and tourism that may be affected Economic loss to fisheries, aquaculture and tourism due to oiling. |
| Accidental spills from platforms and ships | Mainly birds, plankton, fish eggs and larvae may be affected. |

9.2 Impacts of the presence of the platform, topside and pipelines

The environmental impact from the presence of the platform and pipelines will be restricted to loss of access to fishing grounds and interference with shipping due to exclusion and safety zones. The potential impacts are described further in Chapter 13. The changes to Hejre topsides will not give an impact on the surrounding environment.

9.3 Impact of planned discharges from Hejre

The maximum daily flow of produced water at Hejre is estimated to be 2,000 BPD, which is a conservative estimate based on no restrictions in the production capacity at South Arne. No produced water will be discharged from the Hejre platform. Residues of Hejre oil and chemicals will be included in discharges of produced water from South Arne only whenever water reinjection at South Arne is not possible for other reasons. During normal operation re-injection of produced water is maximized in order to minimize discharge of produced water at South Arne. Discharge of produced water is monitored through monthly KPIs, ensuring high water reinjection.

The production chemicals to be used at Hejre will be the same as the ones used at South Arne (i.e. they serve the same purposes, e.g. inhibition of scale etc.). The additional discharges at South Arne caused by use of chemicals at Hejre is further assessed in Chapter 9.4. An updated RBA modelling will be conducted for South Arne after production at Hejre starts.

Through the 19 years of design life facility maintenance and well service will be conducted at Hejre, and chemical discharges can be expected. Facility maintenance chemical will be discharged at Hejre, while well service chemicals will go with the production fluid to South Arne and can be discharged from there. Both types of chemicals will be discharged typically over a few hours per job and thus no continuous discharge will happen during operation. Since the discharges will only occur over a short time an assessment of the distance of impact based on acute criteria should be taken into consideration. Anyhow the distance of impact is modelled based on long-term PNEC values based on an assessment factor of 1000 and on short-term PNEC values (derived based on acute L(E)C₅₀ data and using an assessment factor of 100 in accordance with WFD Technical Guidance Document No. 27, 2018). The results can be seen in Table 9-2.

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Table 9-2 Modelling of impact of discharge of facility at Hejre and well service chemicals at South Arne.NA: Not applicable, since discharge from well service is only short term.

| Activity | Type of chemical | Max. distance (m) from discharge point at which PEC/PNEC = 1 (assessment factor = 1000) Long term | Max. distance (m) from discharge point at which PEC/PNEC = 1 (assessment factor = 100) Short term | Duration of discharge |
|-----------------------------|----------------------------|---|---|-----------------------|
| Facility | Wash of Hejre installation | <4500 | <2000 | 2 hours |
| Well service (Acid job) | Frac additive | NA | <500 | 2 hours |
| Well service (Acid job) | Corrosion inhibitor | NA | <5000 | 2 hours |
| Well service (Acid job) | Iron stabilizer | NA | <250 | 2 hours |
| Well service (Wireline job) | Brine lubricant | NA | <1000 | 2 hours |
| Well service (Coil tubing) | Lubricant | NA | <3000 | 2 hours |

All well service discharges are expected to be short-term and will only occur few times over the 19 years, the max. distance of short-term impact for the group of chemicals is <5000 m (corrosion inhibitor). The only discharge occurring with higher frequency is the wash of the installation, which will happen regularly, here the long-term impact is <4500 m.

9.4 Impacts of planned discharges from South Arne

An updated modelling for production at South Arne after tie-in of Hejre has been conducted and the results can be seen in Table 9-3 and Table 9-49-4. Only the chemicals where Hejre tie-in will have an impact on discharged amounts are modelled. The oxygen scavenger and hydrate dissolver are not modelled as they are PLONOR chemicals and thus not expected to pose any risk.

The modelling shows that the PEC/PNEC ratio is exceed <5000 meters from the platform. Discharge of chemicals will affect pelagic species consisting of fish, fish larvae, zooplankton and phytoplankton in the affected area. Whereas benthic species such as the European sturgeon is less likely to be affected as the chemicals are dispersed and diluted in the pelagic parts of the water column before potentially being dispersed to the bottom. Since the duration of the impact is short term and the magnitude of the impact is small, it is assessed that the impact of discharge on pelagic organisms including pelagic fish stocks, is negligible. For benthic species such as the appendix IV species, the European sturgeon, no impact is expected as the chemicals are dispersed at the surface and diluted in the pelagic parts of the water column before potentially appearing on the seabed.

Table 9-3 Modelling of impact of discharge of production chemicals at South Arne.

| Activity | Type of chemical | Max. distance (m) from discharge point at which PEC/PNEC = 1 (assessment factor = 1000) Long term | Discharge scenario for produced water discharge per day [m ³ /day] |
|------------|---------------------------|---|---|
| Production | Corrosion inhibitor | <300 | 2,781 |
| Production | Demulsifier | <100 | 2,781 |
| Production | Antifoam (process) | <100 | 2,781 |
| Production | Scale inhibitor (topside) | <100 | 2,781 |
| Production | Wax inhibitor | <5000 | 2,781 |

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Table 9-49-4 Risk related to discharges from Hejre toe-back project (will be discharged from South Arne).

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts on discharge on pelagic organisms (Production South Arne) | Local | Short-term | Small | Minor impact | Probable | Negligible |

9.5 Impacts of air emissions from Hejre during the production phase

In relation to the operation of the Hejre field, emissions to air will be generated from

- Transportation of crew and material by helicopter, standby boat, tugs and supply boat

Fuel consumption in relation to transportation by vessel and helicopter is based on the conduction of 12 facility maintenance visits a year, covering both planned and emergency maintenance. Transport is divided between ship and helicopter evenly. Trips by ship are expected to last 18 hours each way and include 2 days of standby at the platform per maintenance visit. Furthermore, a yearly campaign by ship is included with a return trip and 15 days of standby. In total ships are expected to operate for a duration equivalent to 37.5 full days. Trips by helicopter are expected to last 1.5 hours each way and to consist of two return-trips per maintenance visit equivalent to 1.5 full days in total.

An estimate of the emissions related to the transportation activities is shown in Table 9-5.

Table 9-5 Estimated emissions related to the transportation activities.

| Transportation activities | Number of vessels | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|---------------------------|-------------------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Helicopters (kerosene) | 1 | 1.5 | 1.2 | 4.7 | 0.02 | 0.006 | 0.0001 | 0,001 |
| Supply vessel (total) | 1 | 37.5 | 10 | 1010 | 17 | 1 | 0 | 1 |

All power at Hejre will be supplied from the host South Arne by existing gas turbine generator using gas as fuel and with a possibility to use diesel as fuel if no gas is available. The need for power supply at Hejre will be minimal as the platform is an unmanned platform.

No flaring will take place at Hejre. Flaring will take place at South Arne where all processing of the multi-phase from Hejre takes place. The general level of flaring at South Arne is expected to remain unchanged (~1,800,000 Sm³ in 2021)..

The annual emissions related to the power generation and flaring at South Arne are approx. 180,000 tons CO₂/year and 200 tons NO_x/year (OSPAR report 2021). It is expected that level of emissions will remain approximately at the same level after Hejre tie-in. In all events, emissions will remain below the limits given in the South Arne EIA (2006), 300,000 tons CO₂/year and 1,000 tons NO_x/year.

The Hejre platform is envisaged to be developed as a normally unmanned installation, controlled from Syd Arne. Similar to other tie-back satellite facilities operated by INEOS (such as South Arne WHPN, Cecilie,

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Nini, Nini East), the overpressure protection philosophy is based on an inherently safe design with hydro-carbon containing process piping designed to withstand shut-in pressure. This approach eliminates the need for a flare system. Limited safety venting will take place, e.g., for routine maintenance of certain equipment and material for safety reasons prior to accessing the equipment. Greenhouse gases will contribute to global warming if emitted, and thus the probability of the impact is assessed to be highly probable. The impacts related to NO_x and SO_x are determined by the surrounding environment and thus are assessed to be low.

Table 9-6 Risk related to emissions from Hejre.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of air emissions (NO _x , SO _x) | Regional | Long term | Small | Minor impact | Low | Negligible |
| Impacts of air emissions (CO ₂ -eq) | International | Long term | Small | Minor impact | Highly probable | Low |

An assessment of emission from use of the hydrocarbon extracted at the Hejre field has been performed and is documented in an Addendum to this Environmental Impact Assessment.

9.6 Impacts of waste

Due to the Hejre being an unmanned platform the waste production will be very limited. The majority of the waste will be produced during maintenance campaigns. All waste from Hejre will be transported to Esbjerg by vessel. The waste will be further sorted out to improve recycling, sent for further treatment at approved waste treatment plants, sent for combustion or for final disposal.

The waste treatment onshore will not have an impact on the marine environment. Risk related to waste is shown in Table 9-7. NORM contaminated equipment will be sent onshore for cleaning and the NORM waste will be sent to temporary disposal at approved disposal sites.

Table 9-7 Risk related to waste from both Hejre.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|------------------|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of waste | Regional | Long term | Small | Minor impact | Very low | Negligible |

9.7 Impacts of underwater noise during the production phase

Various inspections of underwater and possibly maintenance of structures such as cables, pipelines and platform are necessary during the production phase. Such operations require vessels, ROV and potentially acoustic equipment. With the exception of USBL, only acoustic equipment inaudible (i.e. >180 kHz) to marine mammals will be used and can be screened out of the assessment. All use of the USBL and potentially LBL will use mitigation prior to full use. The mitigation will adhere to the procedures thoroughly described in chapter 0.

Following mitigation, the risk of hearing impairment to marine mammals in terms of both TTS and PTS will be reduced to 0 m, which means that a marine mammal needs to be right below the vessel to receive a USBL pulse with a high enough received level to cause TTS or PTS. The overall impact from impacts of underwater noise during the production phase is therefore assessed as negligible.

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It is assessed that with the mitigation as described in chapter 0., the risk of inflicting hearing damages, TTS or PTS, is effectively reduced. It is noted that the implementation of slow start will deter individuals from the site of activity in this project within some maximum 5.5 km based on best available knowledge, and the behavioural reactions cannot be mitigated. However, these behavioural reactions are not considered deliberate disturbance in an area of special importance for breeding, resting or migration. This is because the activities occur within a limited area that is not considered particularly important for any of the cetacean species in the North Sea, nor is a known breeding site. Further, with the implementation of a slow start, the disturbance is short-term and fully reversible within hours, and it is assessed that the ecological functionality of the area for marine mammal species will not be impacted.

European sturgeons cannot hear USBL or LBL signals (chapter 8.5.2). Therefore, potential disturbance of this species during the production phase pertains to work causing vibrations of the seafloor. In such events, sturgeons will likely leave the area and return once the disturbance is over (Krebs, Jacobs, & Popper, 2016) (Popper & Calfee, 2023). These behavioural reactions are not considered deliberate disturbance, because they are short term, fully reversible and take place in a very limited impacted area that is not considered particularly important for European sturgeon that is a predominantly coastal species. The sturgeons can move back into the area and use it as before when the activity is over, because no individuals are killed. Further it is not a breeding site, as sturgeons are anadromous and strictly breed in rivers.

Table 9-8. Environmental severity and risk of impacts of underwater noise during production.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|-----------------------------------|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Underwater noise from inspections | Local | Short-term | Small | Minor impact | Probable | Negligible |

9.8 Impacts of airborne noise and light emissions during the production phase

No significant airborne noise will be generated at the Hejre platform during the production phase.

As previously described, light from platforms may disturb bird's sense of direction. However, during the production phase light is limited to navigational purposes (i.e., signalling to vessels and aircrafts) and incidentally to light the platform to perform work safely. The extent of light disturbance will be similar to the current disturbance.

Noise and light are therefore not expected to impact marine organisms or birds during the production phase. It is therefore assessed that there is no environmental risk (Table 9-9).

Table 9-9 Environmental severity and risk of impacts of artificial light during production.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|--|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Improvement of night foraging opportunities for seabirds | Local | Long-term | Very low | No impact | High Probability | No risk |

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10. Environmental impacts from planned activities during decommissioning

10.1 Potential impacts

Figure 10-1 provides an overview of the potential effects during the decommissioning phase, which are assessed in the present impact assessment.

The expected lifetime of the installation is approximately 19 years. The decommissioning of the platform, wells and pipeline will be conducted in accordance with Danish legislation and international agreements in force at that time. The assessment of potential impacts during the decommissioning is made based on vessels and technology available today. However, it is expected that the technological advancements over the lifetime of the project will improve and hereby reduce the impact.

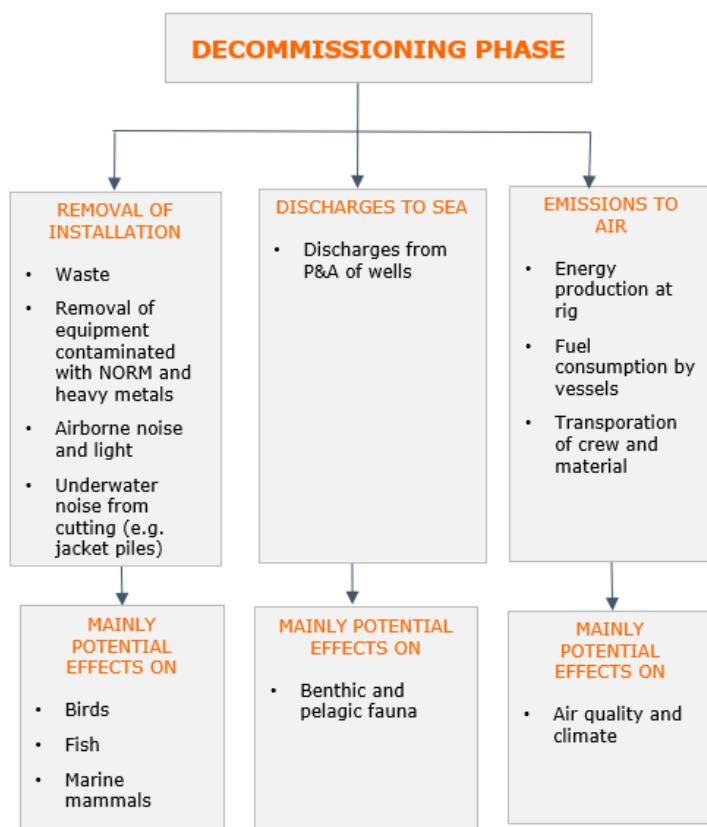


Figure 10-1 Overview of potential impacts during the decommissioning phase assessed in the EIA.

10.2 Impacts of discharges to sea

Discharges from the decommissioning activities will primarily be related to plug and abandonment (P&A) of wells. This will be done by a rig and thus constitute of rig chemicals and discharges from the well P&A.

Modelling has been performed on also short-term, batch-wise discharges as these in some cases contribute significantly to the total amount of chemicals being discharged during one particular sub-process in the development phase. The modelling has only comprised the yellow chemicals used, not any green chemicals. Wash train chemicals, cementing chemicals and slop chemicals will be discharged during the P&A of the Hejre wells. OBM will be shipped to shore for reuse or disposal.

A limited number of utility chemicals will be used at the rig during the P&A of the Hejre wells. It is assumed that 100% of the rig wash and other rig chemicals will be discharged to sea. All rig chemicals are discharged over a period of 6 hours per day, except for the jacking grease, which is discharged over a period of 12 hours while jacking up and down the rig.

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The pipe dope and jacking grease are assumed to be discharged undiluted, while the cleaning agent is diluted 1:400.

The slop chemicals are discharged undiluted.

The wash train chemicals are expected to be discharged over a period of 12 hours per day and diluted in 90 m³.

The cementing chemicals are discharged with the discharged volume of 172 tons across the total P&A campaign. The 172 tons cementing chemicals are expected to be discharged continuously throughout the 154 days during cementing activities.

All discharges of yellow and red chemicals have been modelled. In Table 10-1 the chemicals where the PEC/PNEC ratio exceed 1 is shown along with the distance where exceedance can be expected.

Table 10-1 Modelling of impact of discharge of chemicals used during P&A of the Hejre wells.

| Activity | Type of chemical | Max. distance (m) from discharge point at which PEC/PNEC = 1 (assessment factor = 1000) Long term | Duration of discharge |
|----------------------|----------------------------|---|-----------------------|
| Rig chemicals | Rig wash | <250 | 6 hours |
| | Jacking grease | <1000 | 12 hours |
| Wash train chemicals | Base oil | <1000 | 12 hours |
| | Surfactant | <5000 | 12 hours |
| | Solvent | <5000 | 12 hours |
| Slop chemicals | H ₂ S scavenger | <2000 | 1 hour |
| | Biocide | <2500 | 1 hour |

Especially the wash train chemicals will exceed the PEC/PNEC ratio on longer distances of <5000 m. Discharge of chemicals will potentially affect pelagic species consisting of fish, fish larvae, zooplankton and phytoplankton in the affected area. Since the duration of the impact is short term (within hours) and the magnitude of the impact is marginal, it is assessed that the impact of discharge on pelagic organisms is negligible.

European sturgeons are anadromous and a primarily coastal species but may appear in the project area as successful releases has caused the species to begin appearing as bycatch in the North Sea. It is however still rare events (OSPAR, BDC2020/European or Common sturgeon, 2020), and as such it is not expected to find European sturgeons in the Hejre to South Arne area as it is a predominantly coastal species. Studies on effects of underwater noise have shown that sturgeons react to events that cause vibrations of the seafloor (Popper & Calfee, 2023) by leaving the area (Krebs, Jacobs, & Popper, 2016). This is covered in chapter 8.5.2. It is therefore expected that sturgeons will move away from the area, during decommissioning as this involves removing cables and pipes in the seafloor that will cause vibrations of the seafloor that sturgeons may hear. They will therefore not be exposed to chemical pollution from the decommissioning, also the pollution is primarily in the pelagic part of the water column and sturgeons are on the bottom. It is assessed that the risk of chemically polluting sturgeons by the decommissioning activities is negligible.

It is expected, based on the above literature, that sturgeons will come back when the disturbance is over. These behavioural reactions are not considered deliberate disturbance in an area of special importance for

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breeding, resting or migration, because the activities take place in a limited impacted area that is not considered particular important for European sturgeons that is a predominantly coastal species. It is further a short-term disturbance, and the animals can move into the area when the decommissioning is over and use it as before, as no individuals are killed. Further, it is not a breeding site, as sturgeons are anadromous and strictly breed in rivers, and the decommissioning of the Hejre field can therefore not negatively impact breeding sites.

The impact from P&A can only be preliminary assessed given that the activities and used chemicals can change when the specific decommissioning programme is completed. But from the initial modelling the impact can be described as stated in Table 10-2.

Table 10-2 Environmental severity and risk of impacts of discharges to sea during decommissioning (P&A of wells)

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|--|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of discharge to sea during decommissioning | Local | Short term | Small | Minor impact | Probable | Negligible |

10.3 Impacts of emissions to air

Emissions to air from decommissioning activities are related to:

- Energy production at the jack-up rig
- Fuel consumption by special vessels such as heavy lifting vessels, rock dumping vessels, offshore construction vessels etc.
- Transportation of crew and material by helicopter, standby boat, tugs and supply boat

Energy consumption at the rig will mainly be used for plugging and abandoning of wells and including power supply for pumps and compressors. Energy consumption for other purposes such as the accommodation module etc. is expected to be marginal. The energy is provided by generators powered by diesel engines.

A standby vessel is required when rig activities are conducted, and thus the standby boat is operating 24 hours for 255 days.

All materials, supplies, waste etc. will be transported offshore/onshore by supply vessels.

An estimation of the emissions related to the decommissioning activities is carried out in Table 10-3. All estimated days include weather delays and unforeseen events.

Table 10-3 Estimated emissions related to the total decommissioning phase.

| Decommissioning | Number of vessels | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|-------------------|-------------------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Rig | 1 | 255 | 10 | 6,900 | 115 | 9 | 0.3 | 4.1 |
| Heavy lift vessel | 1 | 83 | 47 | 10,510 | 180 | 14 | 0.5 | 6.5 |
| Supply vessel | 1 | 97 | 7 | 1,830 | 30 | 2.5 | 0.1 | 1.1 |

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| Decommissioning | Number of vessels | Days | Fuel consumption [m ³ /day] | CO ₂ [ton] | NO _x [ton] | SO _x [ton] | CH ₄ [ton] | nmVOC [ton] |
|------------------------------|-------------------|------|--|-----------------------|-----------------------|-----------------------|-----------------------|-------------|
| Survey vessel (ROV) | 1 | 70 | 4 | 755 | 15 | 1 | 0.03 | 0.5 |
| Pipe Trench/Jet Skid | 1 | 5 | 30 | 405 | 10 | 0.5 | 0.02 | 0.2 |
| Rock dumping vessel | 1 | 8 | 27 | 590 | 10 | 1 | 0.03 | 0.3 |
| Offshore construction vessel | 1 | 28 | 20 | 1,510 | 25 | 2 | 0.1 | 0.9 |
| Diving support vessel | 1 | 320 | 24 | 20,700 | 350 | 26 | 1 | 13 |
| Standby boat | 1 | 255 | 10 | 6,900 | 115 | 9 | 0 | 4 |
| Tugs | 3 | 20 | 20 | 3,250 | 55 | 4 | 0 | 2 |
| Helicopters (kerosene) | 1 | 109 | 1.2 | 360 | 1 | 0 | 0 | 0 |
| Total [ton] | | | | 53,710 | 906 | 69 | 2 | 33 |

¹⁾ The SO_x emission factor is field specific and thus not provided by Norsk Olje og gass (2019), but is based on information from INEOS

Due to the characteristics of the greenhouse gases, they will contribute to global warming if emitted, and thus the probability of the impact is assessed to be highly probable. The impacts related to NO_x and SO_x are determined by the surrounding environment and thus are assessed to be low.

Table 10-4 Environmental severity and risk of impacts of air emissions during decommissioning.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of air emissions (NO _x , SO _x) | Regional | Short term | Small | Minor impact | Low | Negligible |
| Impacts of air emissions (CO ₂ -eq) | International | Short term | Small | Minor impact | Highly probable | Low |

10.4 Impacts of waste

The process fluids, fuels and lubricants will be drained from the Hejre platform and transported ashore for controlled disposal at a decommissioning yard.

After cleaning, the topsides will be transported to shore for further cleaning and recycling. First priority is direct reuse of process equipment after cleaning. The jacket will also be transported to shore and be cleaned for marine growth. Both the topside structure and the jacket structure is expected to be recycled.

In total, around 12,500 ton of material is planned to be taken onshore for cleaning and reuse/recycling. Referring to two decommissioning reports from UK the % of reuse and recycling is expected to be above 95% and the amount for landfill is in the area of 2.5% and the remainder is burned for energy production.

NORM may occur as for example in the wells. NORM contaminated equipment will be cleaned, and the NORM waste will be sent to temporary deposit at approved disposal sites.

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Heavy metals, as for example mercury, can also occur and will need to be cleaned at the onshore plant to where the installation will be transported for controlled dismantling.

INEOS will ensure that the onshore decommissioning yard will have the environmental approval in place for handling the different types of contaminants on the Hejre topsides, which are not possible to remove during the offshore cleaning of the topsides.

Details about management of waste during decommissioning will be described in a decommissioning plan and a waste management plan.

Table 10-5 Environmental severity and risk of impacts of waste handling during decommissioning.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|----------------|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Waste handling | Local | Short term | Small | Minor impact | Low | Negligible |

10.5 Impacts of noise and light emissions

As previously described, light from platforms may disturb bird's sense of direction (Section 8.6). However, during the production phase light is limited to navigational purposes (i.e. signalling to vessels and aircrafts) and incidentally to light the platform to perform work safely. The extent of light disturbance will be similar as today. There will be some loud noise during decommissioning that will scare seabirds away. The noise will be local and will not harm sea birds. Noise and light are therefore not expected to impact marine organisms or birds during the decommissioning phase.

10.6 Impacts from underwater noise

During the decommissioning there will be generated underwater noise from vessels and cuttings of underwater structures. Prior to moving in the rig, a survey of the seabed will take place using ROV with USBL. The survey will take up to 24 hours to conduct.

Underwater noise may affect marine organisms in different ways. As cetaceans (i.e. whales, porpoises and dolphins) depend on the underwater acoustic environment for orientation and communication, they are believed to be the marine organisms that are most sensitive to underwater noise (NOAA, 2018). Seals and fish may, however, also be affected by underwater noise.

Noisy activities during decommissioning include broad band noise from heavy lift vessels and service vessels. It has been found that the sound exposure level (SEL_{cum}) of passing vessels during a 30-second- window reached values between 105–145 dB re 1 µPa²s and that harbour porpoises react to this noise level (Dyndo et al. 2015). However, underwater noise from vessels is not expected to exceed the threshold for hearing damage (Tougaard et al. 2016, NOAA 2018).

In addition to the noise from vessels there will potentially be underwater noise from diamond wire cuttings (Pangerc et al. 2016). It has been shown that underwater noise from decommissioning of a platform at 80 m depth increase the background underwater noise with 4-15 dB which will not lead to hearing damage of marine mammals.

Various operations underwater are necessary during the decommissioning. Such operations require vessels, ROV and potentially acoustic equipment. With the exception of USBL, only acoustic equipment inaudible (i.e. >180 kHz) to marine mammals will be used and can be screened out of the assessment. All use of

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the USBL will be with mitigation prior to full use. The mitigation will adhere to the procedures thoroughly described in chapter 0.

Following mitigation, the risk of hearing impairment to marine mammals in terms of both TTS and PTS will be reduced to 0 m, which means that a marine mammal needs to be right below the vessel to receive a USBL pulse with a high enough received level to cause TTS or PTS. The overall impact from impacts of underwater noise during decommissioning is therefore assessed as negligible.

It is noted that the implementation of slow start will deter individuals from the site of activity in this project within some maximum 5.5 km based on best available knowledge, and the behavioural reactions cannot be mitigated. However, these behavioural reactions are not considered deliberate disturbance in an area of special importance for breeding, resting or migration, because the activities take place in a limited impacted area that is not considered particularly important for any of the cetacean species in the North Sea, nor is a known breeding site. Further, with the implementation of a slow start, the disturbance is short-term and fully reversible within hours, and it is assessed that the ecological functionality of the area for marine mammal species will not be impacted.

Field studies have shown that several species of fish may be disturbed by noise from passing vessels and they may flee from the vessel while other species are not affected (Freon et al. 1993). Noisy activities are marginal, local, and temporary and will not affect fish populations.

European sturgeons are anadromous and primarily coastal species but may appear in the project area as successful releases has caused the species to begin appearing as bycatch in the North Sea. It is however still rare events (OSPAR, BDC2020/European or Common sturgeon, 2020), and as such it is not expected to find European sturgeons in the Hejre to South Arne area during decommissioning. Studies on effects of underwater noise have shown that sturgeons react to events that cause vibrations of the seafloor (Popper & Calfee, 2023) by leaving the area (Krebs, Jacobs, & Popper, 2016). This is covered in chapter 8.5.2. It is therefore expected that sturgeons will move away from the area, during decommissioning if this causes activity in the seafloor such as removing cables and pipes, rather than staying. It is also expected, based on the above literature, that sturgeons will come back when the disturbance is over. These behavioural reactions are not considered deliberate disturbance because the activities take place over short time, are fully reversible, and take place in a limited impacted area that is not considered particularly important for European sturgeon that is a predominantly coastal species. The animals can swim back into the area when the decommissioning is over and use it as before, as no individuals are killed. Further, it is not a breeding site, as sturgeons are anadromous and strictly breed in rivers, and this project can therefore not negatively impact breeding sites.

Based on the above and using the criteria described in Chapter 8.5.3 it is assessed that the environmental risks related to decommissioning on marine mammals and fish is **Negligible** (Table 10-6).

Table 10-6: Environmental severity and risk of impacts of activities during decommissioning.

| Impact | Extent of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|---|------------------|--------------------|---------------------|----------------------|-----------------------|--------------------|
| Impacts of underwater noise on marine mammals | Local | Short-term | Small | Insignificant impact | Highly probable | Negligible |
| Impacts of underwater noise on fish | Local | Short-term | Small | Insignificant impact | Highly probable | Negligible |
| Underwater noise from inspections | Local | Short-term | Small | Minor impact | Probable | Negligible |

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11. Environmental impact of accidental oil and chemical spills

The original oil spill modelling in the EIA for Hejre Legacy was updated in 2020 with updated data on reservoir pressure, flow rates from wells etc. is available, see DNV (2020). The following section is based on the updated oil spill modelling.

The impacts of the following types of accidental spills have been assessed in this chapter:

- Spill of oil and emission of gas during an accidental blowout at Hejre
- Accidental spill due to rupture of the new pipeline

Blow out and rupture of pipelines causing discharge and dispersal of oil are extremely rare events. However, in case of blowout and rupture the environmental impacts may be severe. Experience from previous blowouts and oil spills at sea have shown that it is mainly birds, marine mammals, fish and coastal ecosystems that may be affected by large oil spills.

11.1 Environmental impacts of an oil release during a blowout incident

The worst-case scenario in terms of accidental oil spill is an uncontrolled blow out during production. A blowout is the uncontrolled release of crude oil and/or natural gas from a well after pressure control systems have failed. The probability of a blowout occurring is very low but in case a blowout occurs, wide reaching and severe impacts on the marine environment may occur.

11.1.1 Risk of a blowout

Blowout is an extremely rare event and extensive preventative/control measures are implemented to reduce the likelihood of such events. It has been estimated that the risk (frequency) of a blowout occurring at Hejre is 9×10^{-6} per year (INEOS Oil & Gas 2019).

A blowout will last until the well is under control again. This may take anywhere from a few hours, if control can be regained using the safety systems present, up to several months if a so-called relief well needs to be drilled to regain control over the original well. History shows that most wells can be brought back under control within one to a few days.

11.1.2 Fate and effects of oil

During a blowout the oil is spread with the surface currents, simultaneous undergoing a wide array of processes including evaporation, dispersion, emulsification, dissolution, oxidation, sedimentation and biodegradation. Oil components and their breakdown product may affect marine and coastal habitats and species. In general, the most severe impacts of an oil spill will occur if the oil slick passes concentrations of seabirds or if the oil ends up in near coastal waters and on shorelines. For a more detailed description of the fate and effects of an oil spill reference is made to Appendix A.

11.1.3 Methodology

DNV GL Norway carried out oil spill modelling of topside blowouts at Hejre using the OSCAR statistical oil drift model developed by SINTEF, Norway. OSCAR is a 3D modelling tool used to predict the movement and fate of oil on the sea surface and throughout the water column.

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The modelled blowout case represents a variety of 3 release rates Table 11-1 and 4 duration combinations with an individual distribution Table 11-2. The probability of a blowout is extremely low. Furthermore, in the unlikely event that a blowout should occur, the duration will in most cases be short-term (<15 days), whereas the probability of a long-lasting blowout of 100 days is only 6.5 %. A long-lasting blowout (100 days) is the expected duration for mobilizing a drilling rig and drill a relief well.

Table 11-1 Oil spill drift modelling matrix. Release rates as well as the probability distributions of release rates based on information from Lloyds (2019) and blowout statistics (for further information reference is made to Appendix A).

| Scenario variations | | | | |
|---|------|------|------|--|
| Release rates (Sm ³ /day) | 2077 | 2525 | 7328 | |
| Probability distribution (%) | 34 | 33 | 33 | |
| Number of simulations (trajectories/year) | 36 | 24 | 12 | |

Table 11-2 Oil spill drift modelling matrix. Release duration as well as the probability distributions of release durations based on information from Lloyds (2019) and blowout statistics (for further information reference is made to Appendix A).

| Scenario variations | | | | |
|------------------------------|------|------|-----|-----|
| Release duration (days) | 2 | 15 | 35 | 100 |
| Probability distribution (%) | 52.7 | 35.2 | 5.6 | 6.5 |

The assessment of the environmental impacts of accidental blowout is based on a matrix using all four scenarios representing a worst-case scenario in which no mitigating oil spill response measures are taken. The simulations have been made using both stochastic and deterministic modelling.

Stochastic modelling possesses some inherent randomness versus a deterministic model where the output is fully determined by the parameter values and the initial conditions.

The use of a stochastic model means that the blowout can be analysed statistically. However, the prediction represents the gross area that may potentially be affected by a spill as it combines the impact area of several single spill events and therefore does not represent how a blowout will look in reality (see number of simulation events in Table 11-1).

In contrast, the deterministic model simulates a single spill at a chosen date under the weather conditions at that point in time. Thus, it predicts the actual trajectory of a single spill event, but it does not consider the statistical uncertainty of the fact that the spill trajectory will be different under different weather conditions.

Efficient oil spill response measures will reduce the spreading of spills significantly and thereby the extent and magnitude of environmental damage is most likely smaller than the model results indicate.

Table 11-3 provides a list of the threshold used in the impact assessment.

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Table 11-3 Sea surface, water column and shoreline thresholds for impact scoring

| Species/habitat exposed to oil | Threshold | Justification |
|--|--------------------------------------|---|
| Seabirds, emulsion on water surface | 1 µm | The 1 µm threshold is considered below levels which would cause harm to seabirds from exposure of oil. Exposure above threshold will lead to effects such as transferring oil to eggs reducing hatching success (French-McCay 2009). |
| | 10 µm | The 10 µm threshold for oil on water surface has been observed to lead to 100% mortality of impacted seabirds and other wildlife associated with the water surface (French-McCay 2009). |
| Seabirds, shoreline | “Light oiling” or above on shoreline | Light oiling of shoreline may result in mortal impact on seabirds. |
| Marine mammals (fur-bearing), oil emulsion water surface | 10 µm | The 10 µm threshold for oil on water surface has been observed to mortally affect fur-bearing marine mammals such as seals (French-McCay 2009). |
| Marine mammals (fur-bearing), oil emulsion on shoreline | “Light oiling” or above on shoreline | Light oiling impacting shoreline may result in mortal impact on fur-bearing marine mammals such as seals, if they get impacted when hauling onto or resting at beaches. |
| Marine mammals (cetaceans), oil emulsion on water surface | 100 µm | Cetaceans are less sensitive to oil compared to seals, as it does not stick to their skin. Cetaceans can inhale oil and oil vapour when surfacing to breathe leading to internal injuries (French-McCay 2009). |
| Fish, THC in water column | 25 ppb | Following guidelines from the Norwegian Oil Industry Association effects of acute oil pollution on fish eggs and larvae will be seen in THC concentrations >25 ppb |
| | 70.5 ppb | According to OSPAR 2014/5 concentrations >70.5 ppb are considered as having potential for chronic impacts to juvenile fish and larvae that might be entrained within the oil plumes |
| | 500 ppb | The 500 ppb threshold is considered conservative high exposure level in terms of potential for toxic effects leading to mortality of 50% of all marine life if impacted by an acute oil spill |
| Seabed habitat | 25 ppb | Seabed habitats considered are protected reefs and areas with protected cold-water corals; areas with a high ecological production. This threshold is used to identify when the most sensitive marine life (fish eggs and larvae) begins to be affected by acute oil pollution on. Based on guidelines from the Norwegian Oil Industry Association. |
| Shoreline habitats | “Light oiling” or above on shoreline | The Environmental Sensitivity Index (ESI) is used for assessing the sensitivity of various types of shoreline to acute oil pollution. |

11.1.4 Modelled dispersion of oil from an unmitigated blowout

Figure 11-1 shows the modelled stochastic probability that the sea surface in 10x10 km grid cells could be hit by more than 1 tonnes of oil released at Hejre during March-August and September-February, respectively. It is seen that released oil during blowout will be transported towards northeast with the prevailing currents, but may also be transported to UK, German and Dutch waters including Natura 2000 areas (SACs).

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Figure 11-2 shows the seasonal resolution of arrival times (since start of the release) within the influence area to 10 x 10 km grid cells (drift time). It is seen that it will take approximately 2 weeks for oil to reach shore. However, it should be noted that although all shores are statistically affected by oil in case of a blow-out according to Figure 11-1, it also shows that the amount of oil that hits the shore are below the detection level of 4 tonnes per 100 km² (0.04 µm thickness).

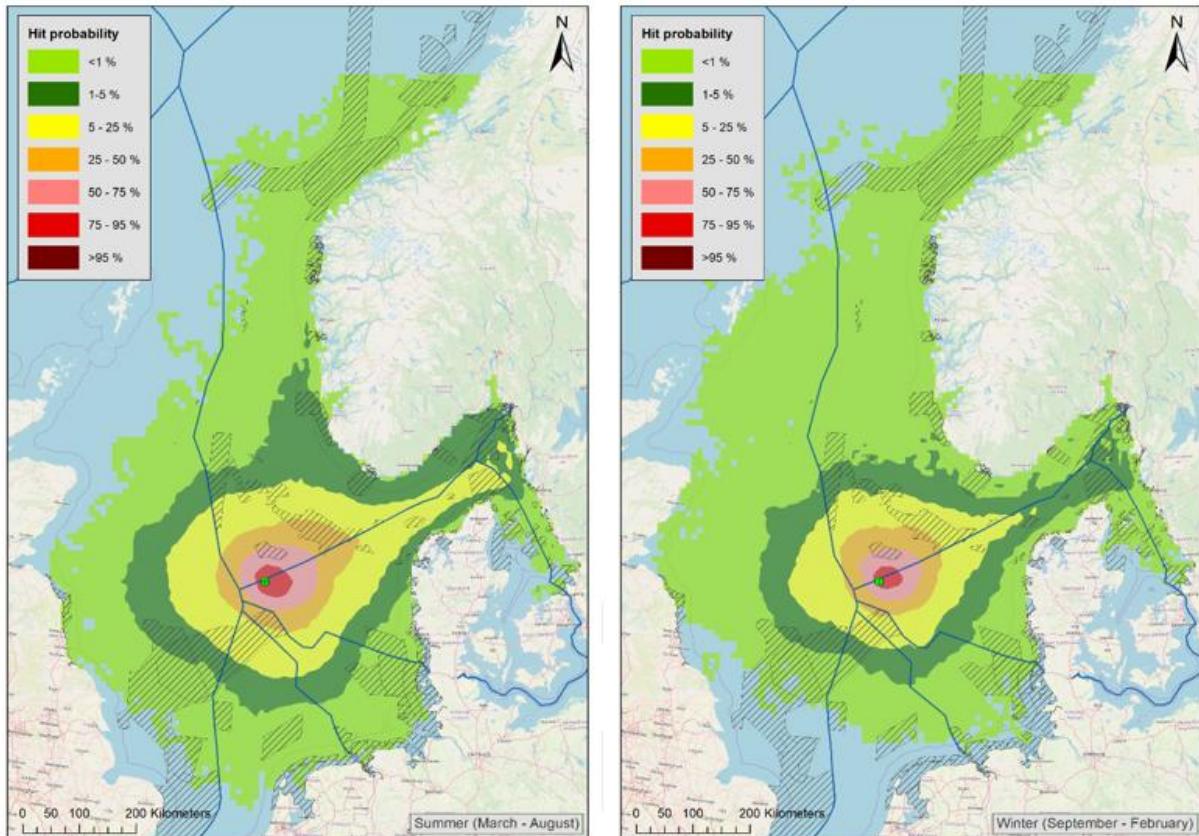


Figure 11-1 Result of stochastic oil spill modelling of a worst case, unmitigated surface release of oil during a blowout at Hejre during March-August (left) and September-February (right). The figures show the modelled probability that the sea surface in 10x10 km grid cells could be hit by more than 1 tonnes of oil released at Hejre. The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

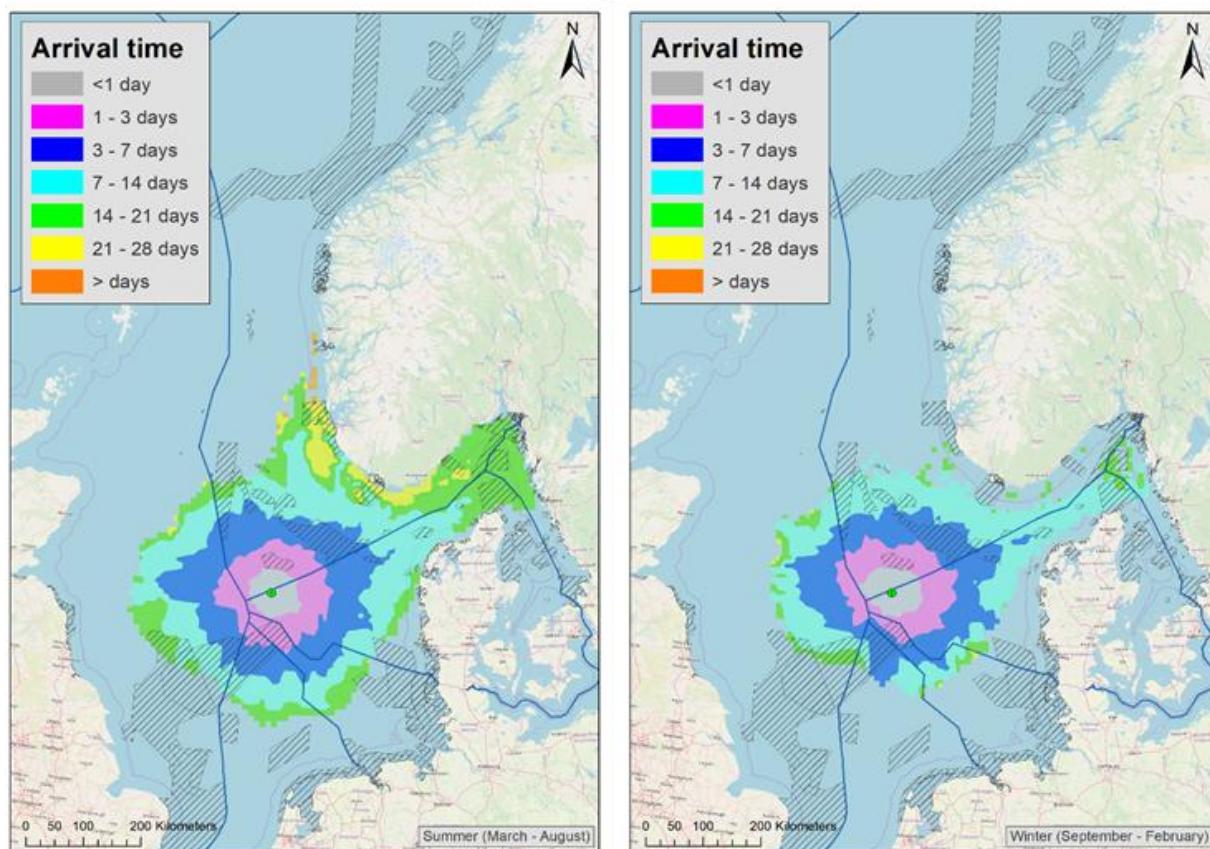


Figure 11-2 Result of stochastic oil spill modelling of a worst case, unmitigated surface release of oil during a blowout at Hejre during March-August (left) and September-February (right). The figures show the seasonal resolution of arrival times (since start of the release) within the influence area to 10 x 10 km grid cells; The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

The seasonal resolution of oil mass within the influence area is shown in Figure 11-3. The figure shows that there will be up to 50 tonnes of oil per 100 km² in the North-eastern part of the closest SAC during summer and up to 25 tonnes per 100 km² during winter.

Table 11-4 shows the expected surface oil layer thickness corresponding to the oil mass according to the Bonn Agreement (2016). Five levels of oil appearances are distinguished in the Bonn Agreement.

Birds are generally considered to be affected by surface oil when the emulsion thickness exceeds 1 µm whereas seals and cetaceans (incl. harbour porpoise) are more tolerant to surface oil. Latter being affected when emulsion thickness exceeds 10 µm and 100 µm for seals and cetaceans respectively (French-McCay 2009).

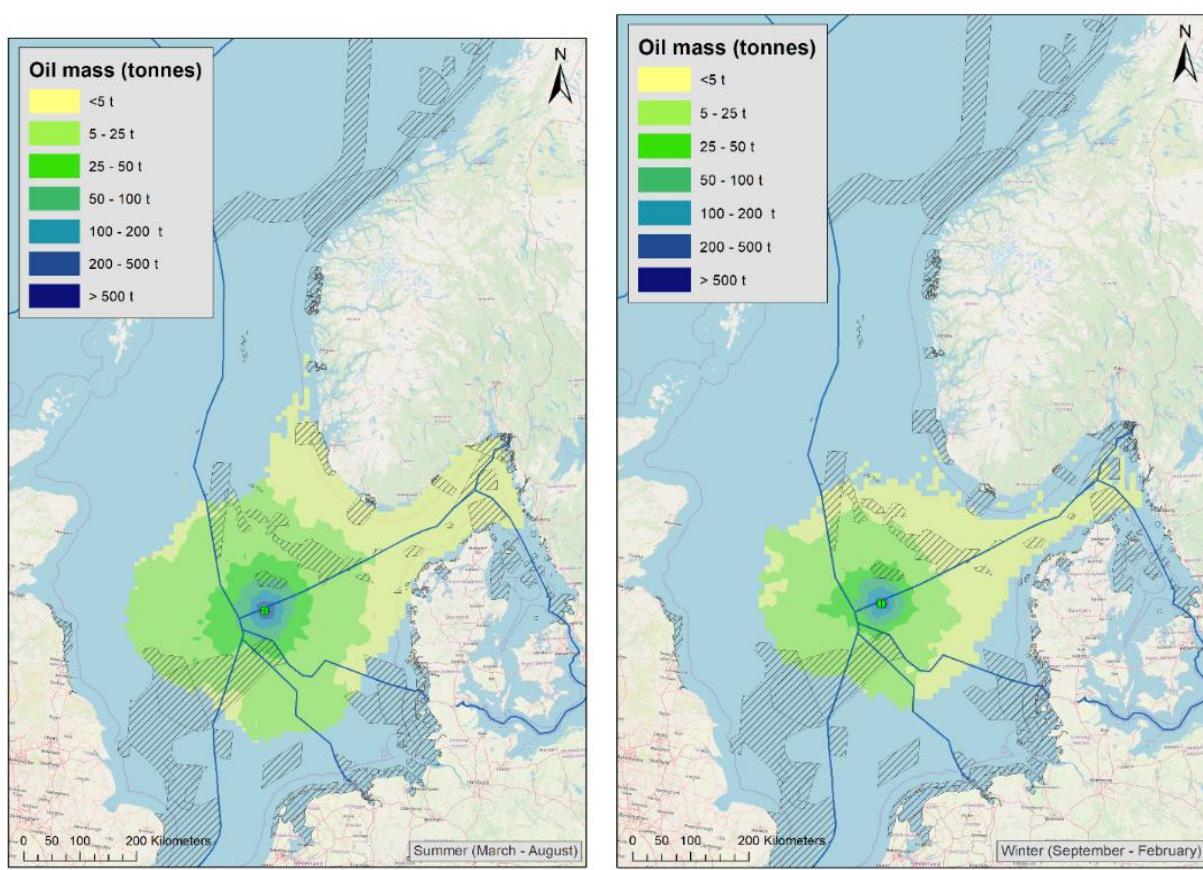


Figure 11-3 Seasonal resolution of oil mass within the influence area in 10 x 10 km grid cells; Summer left and winter right, including marine protected areas, SVO areas and country border lines.

Table 11-4 Levels of oil appearances distinguished according to the Bonn Agreement (2016).

| Code | Description/Appearance | Layer thickness (µm) | Tonnes per 100 km ² |
|------|-------------------------------|----------------------|--------------------------------|
| 1 | Silver/gray | 0.04 - 0.30 | 4 - 30 |
| 2 | Rainbow | 0.30 - 5.0 | 30 - 500 |
| 3 | Metalic | 5.0 - 50 | 500 - 5,000 |
| 4 | Discontinuous true oil colour | 50 - 200 | 5,000 - 20,000 |
| 5 | Continuous true oil colour | > 200 | > 20,000 |

11.1.5 Impacts on seabirds of oil from a blowout incident

It is well-documented that seabirds are extremely vulnerable to oil spills and that large numbers of seabirds are often killed in connection with an oil spill in areas where seabirds are concentrated. The reason for seabirds being especially vulnerable is that they are often in contact with surface water, and that the oil destroys the buoyancy and the isolating quality of the plumage.

Birds smothered in oil will usually die of cold or starvation or drown. Even very small spots of oil may be fatal, especially during winter. Mainly seabirds that stay on the sea surface for longer periods are at risk, but all types of seabirds may be affected (Trosi et al 2016). The threshold for emulsion thickness considered as harmful for birds is 1 µm (French-McCay 2009) (roughly 100 t per 10 x 10 km, Table 11-3, Table 11-4). Exposure above this threshold will lead to effects such as transferring oil to eggs reducing hatching success. Emulsion thickness of more than 10 µm will lead to immediate killings.

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In the unlikely event of a blowout incident at Hejre the oil will most likely be transported towards northeast with the prevailing currents and pass the internationally important bird areas in the Norwegian part of the North Sea. The probability that this area will be impacted by a blowout is extremely low. However, in the unlikely case of a long-lasting unmitigated blowout, the probability that the area will be affected is high (i.e. 50-75 % in the eastern part of the area, decreasing to 25-50 % further away). The drift time to these areas is 1-3 and 3-7 days, respectively (Figure 11-1 and Figure 11-2). The area is important for gulls and auks (i.e. mainly little auk, but also guillemot and razorbill (Skov et al. 1995, Skov et al. 2007). The auks are particularly vulnerable to oil spills as they spend most of their time on the sea surface. The birds are particularly vulnerable during winter where most species are clustering. It is estimated that around 1 million birds are present in the North Sea during winter (Skov et al. 2007). The northern part of the Danish EEZ in the North Sea is considered an intermediate important conservation area for seabirds (Skov et al. 2007). Consequently, there is a high risk of oiling and killing of birds in this area in the unlikely event of a blowout. On the other hand, the important bird areas in and immediately off the Wadden Sea will not be affected.

11.1.6 Impacts on marine mammals of oil from a blowout incident

The modelling shows that oil from a blowout may reach areas where harbour porpoise, grey seals or harbour seal may be encountered. Harbour porpoises and seals are generally less vulnerable to oil spill than birds (i.e. threshold for seals is estimated to 10 µm while the threshold for cetaceans is 100 µm, French-McCay 2009) (10 µm corresponds to ca.10 t oil per 10x10 km (Table 11-4). As their heat insulation is due to their layer of blubber a porpoise or seal smothered in oil will not be fatal as is the case with a bird.

11.1.6.1 Harbour porpoise

Comparatively little is known about the effects of oil on cetaceans (whales, dolphins and porpoises) but based on scant records of cetacean mortality associated with oil spills, it has been suggested that an oil spill may only affect small numbers of cetaceans. Several authors suggest that the threat of most immediate concern is inhalation of evaporated volatile toxic components from the oil slick on the sea surface if they emerge at the surface to breathe in the middle of an oil slick. This risk is greatest near the source of a fresh spill because volatile toxic vapours evaporate and disperse relatively quickly. When concentrated vapours are inhaled, mucus membranes may become inflamed, lungs can become congested, and pneumonia may ensue. Inhaled fumes from oil may accumulate in blood and other tissues, leading to possible liver damage and neurological disorders. As porpoises rely on blubber for insulation their thermoregulatory ability does not seem seriously hampered by contact with oil (Helm et. al. 2015).

Harbour porpoises in the Central North Sea may be affected in the unlikely incidence of a blowout at Hejre. However, as the oil slick during a blowout is transported in a relatively narrow band in the direction of the currents and as the density of porpoises is relatively low (0.01-8 individuals/km²) only a tiny fraction of the populations of harbour porpoise in the North Sea is likely to be affected (Geelhoed et al 2014). It is therefore not likely that a potential oil contamination from a blowout will significantly affect the population sizes of the harbour porpoises in the North Sea.

11.1.6.2 Seals

Seals may be affected by direct contact with oil in a variety of ways. Oil can coat all or portions of their body surface and they may inhale toxic fumes of hydrocarbons, which affects their lungs. In addition, they may ingest oil directly or ingest oil-contaminated prey. As seals rely on blubber for insulation their thermoregulatory ability does not generally seem seriously to be hampered by contact with oil. However, observations suggest that some individuals have become so encased in oil that they were not able to swim and subsequently drowned. In addition, observation also suggest that eyes, oral cavity, respiratory surfaces and urogenital surfaces are particularly sensitive to contact with oil (Helm et al. 2015). It cannot be excluded that seals in the Central North Sea may be affected. However, as the oil slick during a blowout is transported in

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a relatively narrow band in the direction of the surface currents and as seals are relatively rare in the Central North Sea only a tiny fraction of the populations of seals is likely to be affected. It is therefore not likely that a potential oil contamination from a blowout will significantly affect the population sizes of the seals.

11.1.7 Impacts on ocean quahog, fish eggs- and larvae of oil from a blowout incident

The ocean quahog (*Arctica islandica*) is listed as threatened and vulnerable in accordance with OSPAR list of threatened and declining habitats and species and thus protected from adverse human impacts through the obligations defined in the OSPAR annex V and can be present in the project area. While the primary pressure on the species is from physical disturbance of the sea floor, an oil spill will as described result in the release of a range of chemical compounds such as PAH's which are known to potentially affect benthic fauna.

A study carried out by Webster and Fryer (2022) found that though concentrations of PAH's in shellfish and sediments in the North Sea were above the natural background levels, measured concentrations were ERL and thereby assessed not to have adverse effects on bivalves. Dependent on the scale and duration of the outlet, concentrations may reach levels exceeding ERL thus potentially adversely affecting benthic fauna, including *A. islandica*. A similar impact from other chemicals cannot be ruled out.

The adverse effects of such an event will be limited to areas directly affected by the spill and the magnitude of the impact will decrease with distance to the source.

Eggs and larvae are considered the most sensitive life stages of fish in terms of acute impacts of spilled oil. The Norwegian Oil Industry Association use 25 ppb as the concentration at which fish eggs- and larvae and other sensitive marine life begin to be affected by oil components. A literature review conducted by BP suggested that oil content greater than 500 ppb will cause acute toxicity to over 50 % of the marine life in the area (DONG E&P 2015).

For oil in the water column, the modelling shows that concentrations above 25 ppb is limited to a tiny area around Hejre which constitutes a negligible fraction of the entire spawning areas for ocean quahog and fish in the North Sea (Figure 11-4). In addition, the important nursery areas for larvae of cod, whiting, Norway pout, haddock and sand eel at the productive hydrographical front in the north-eastern part of the North Sea will not be affected by an oil blowout. It is therefore concluded that an oil blowout at Hejre will not measurably affect the amount of ocean quahog, fish eggs and larvae in the North Sea.

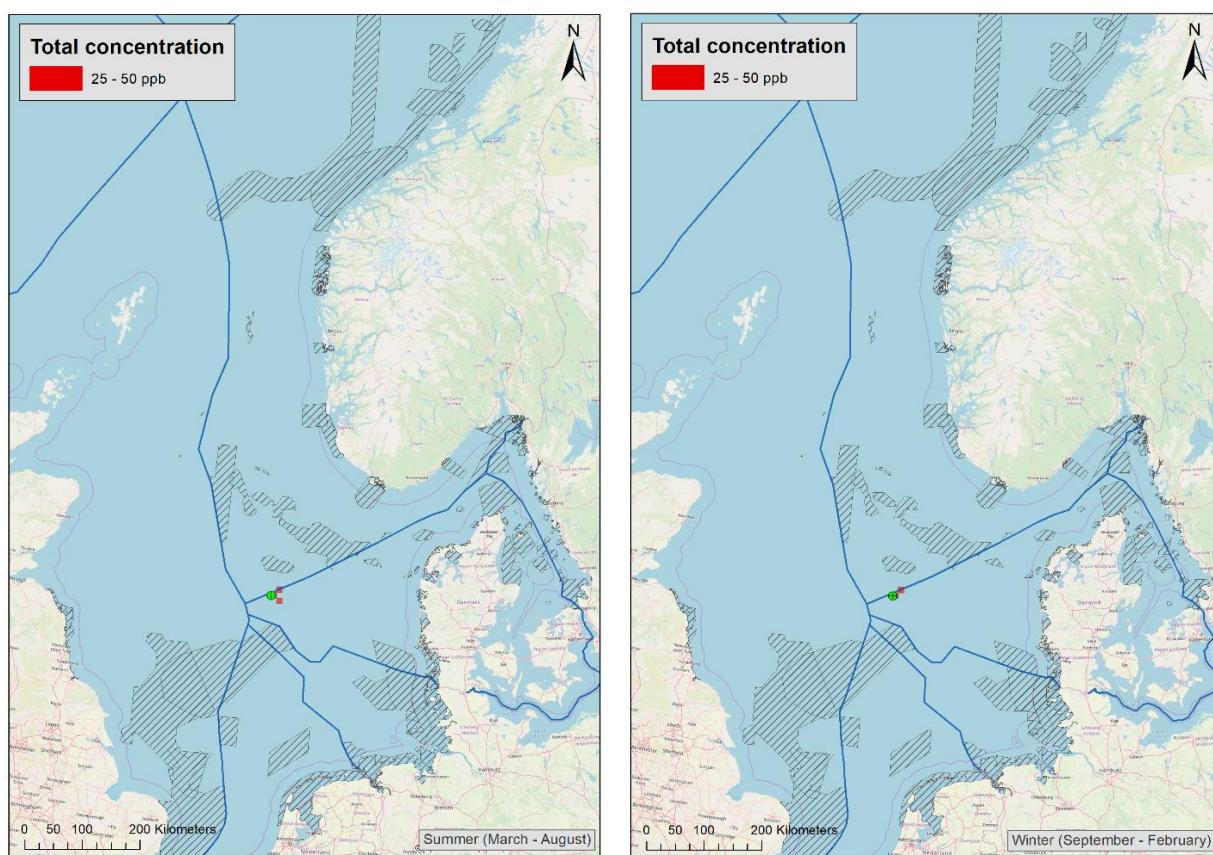


Figure 11-4 Result of oil spill modelling of a worst case, unmitigated surface release of oil during a blowout at Hejre during March-August (left) and September-February (right). The figures show seasonal resolution of total concentration of dissolved oil components within the influence area in 10 x 10 km grid cells. Oil in the water column is only within detection level (>25 ppm) in the coloured squares. The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

11.1.8 Impacts of oil stranded on shorelines from a blowout incident

Shorelines, more than any other part of the coastal environment, are exposed to the effects of floating oil. Oil stranded on beaches often gives rise to concern because it may affect sensitive coastal habitats and important socioeconomic conditions. Further, the cleaning of oiled beaches may be costly. The vulnerability of shorelines to oil spills differs considerably depending on the type of habitat and with respect to how easy they are to clean up after an oil spill.

The modelling shows that the risk of oil stranding on coasts is negligible, the probability generally being < 1%, see Figure 11-6. In some areas, especially along the Norwegian coast, the probability has however, been calculated at 1-5 %. The modelling shows that the drift time to the coast in these areas is at least 14-28 days.

The reason for the low risk of stranding is that oil components will have undergone a wide array of processes including evaporation, dispersion, emulsification, dissolution, oxidation, sedimentation and biodegradation before reaching the shorelines.

The Danish coastlines, which may be hit by stranded oil are generally exposed, gently sloping sandy beaches. These types of beaches are not particularly vulnerable to oil as they are not very productive ecologically. In addition, the oil does not penetrate the sand readily, facilitating mechanical removal (IPIECA 1996).

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It is expected that the drift time from Hejre to the shoreline will be in the range 14-21 days (DNV, 2020), thus the stranded oil will mostly be in the form of tar balls. This can be seen from Figure 11-5, which illustrates the breakdown processes of oil over time. The most volatile components have evaporated, and emulsification and dispersion have almost terminated after approximately a week, leaving only hard degradable oil components that can form tar balls by wave impacts. Tar balls are even easier to remove on sandy beaches compared to less weathered oil. However, the stranded oil in the summer period may be a nuisance to holidaymakers bathing from the beach.

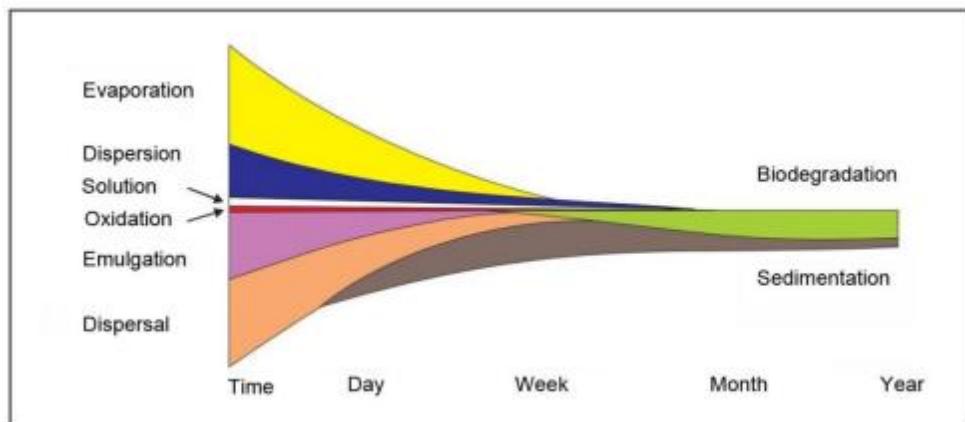


Figure 11-5 Overview of the relative significance of the different physical and chemical processes that affects spilled oil at sea as a function of time (after ITOPF 2002).

The biologically highly productive tidal flats and saltmarshes in the Wadden Sea in the southern part of the Danish coast will not be affected. The Norwegian and Swedish coastlines that may be hit by oil are rocky shores that are more sensitive to oil spills compared to the Danish sandy shores. However, with a drift time of 14-21 days (DNV, 2020) most of the oil will be in the form of tar balls, which are considerably less damaging as they are no longer sticky or toxic.

Shoreline oiling is likely to range between very light and moderate, as defined by ITOPF's recognition of shoreline oiling guidelines. Under the worst-case metocean conditions, the quickest impact on the shoreline in Denmark will be between 14-21 days. Shoreline impact may also happen in Norway (after 14-28 days) and Sweden (after 14-21 days). There will be no shoreline impact in UK, Germany or the Netherlands. In case of a blow-out with surface release during winter, the extent of affected shorelines will be considerably smaller than for a release during summer.

Along the Danish coast, only the stretch on the west coast of Vendsyssel between Hirtshals and Skagen may be hit by oil. Model results indicate that for more than 95% of the simulations only marginal amounts of oil will reach the Danish shoreline, that is <1 tonnes (DNV 2020). Along the Danish coast, only the stretch on the north-west coast of Jutland may be hit by oil. The shortest arrival time during the summer period to the northwest of Jutland is 11,3 days and 13,4 days during the winter period (DNV 2020).

Similarly, only marginal amounts of oil will potentially reach the Swedish coast, that is <1 tonnes during the winter period and 1 ton during the summer period. For Norway this pattern is similar for the winter period, that is 1 tons, however during the summer the model results indicate that 31 tonnes of oil may reach the Norwegian coastline, which is considered to be a limited amount (DNV 2020). The modelling showed that the risk, the extent and the degree of oiling of shorelines during a seabed release of oil is quite similar to a surface release (DNV 2020).

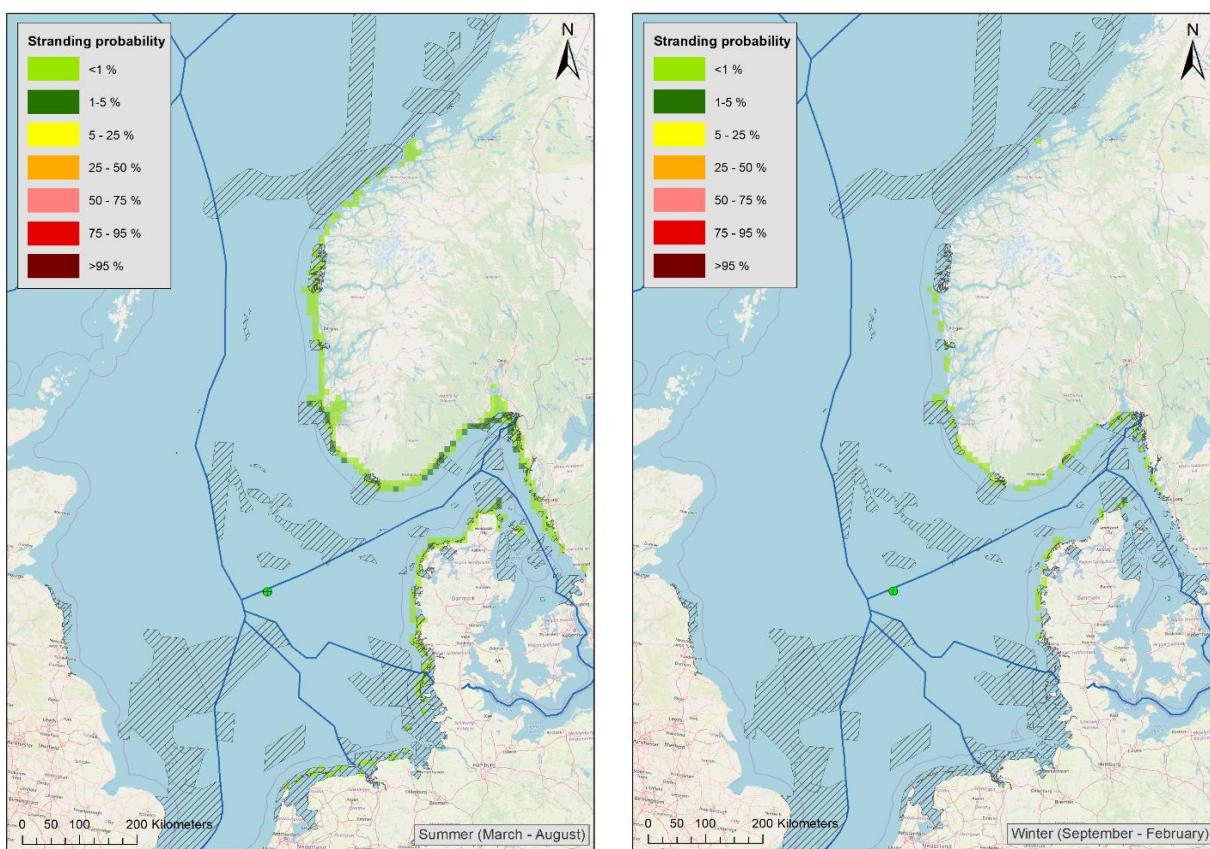


Figure 11-6 Result of oil spill modelling of a worst case, unmitigated surface release of oil during a blowout at Hejre during March-August (left) and September-February (right). The figures show seasonal resolution of shoreline oil hit probabilities of oil in 10 x 10 km grid cells. The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

11.1.9 Impacts on Norwegian SVOs

The modelling shows that Norwegian SVOs may be hit by oil in case of an unmitigated blowout (Figure 11-1 and Figure 11-2) i.e.:

- There is a probability of 5-25% probability that SVO “Makrellfelt”, which is a spawning area for mackerel from May to July will be hit by oil. The calculated drift time from Hejre is 3-7 days.
- Sand eel field south may also be hit (probability 50-75%; drift time 1-3 days. The sand eel field south is spawning and foraging areas for sand eel (*Ammodytes* sp.). Furthermore, the Sand eel field south is a valuable habitat for common guillemot (*Uria aalge*) and northern fulmar (*Fulmaris glacialis*) from April to December. The model results show that the concentration of oil in these areas is less than 25 ppb, which is below concentrations that are harmful to fish eggs and larvae (cf. 11.1.2) so spawning in this area is not at risk.

On the other hand, there is a risk of oiling and killing of birds on the Sand eel field South (cf. 11.1.5).

11.1.10 Impacts on SACs (Natura 2000 sites) and Annex IV species

Assessments of the impacts on SACs (Natura 2000 sites) of oil release during a blowout incident is summarised in the following based on the modelling performed by DNV (2020).

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11.1.10.1 Impacts on German, Dutch and UK Natura 2000 areas south of Hejre

In the unlikely event of a blowout, the German, Dutch and UK Natura 2000 (SAC) areas south of Hejre may be affected by an unmitigated spill, especially the German area i.e. (cf. Table 11-5):

- There is a 25-50 % probability that oil hits the German DE 1003301 *Doggerbank* in March-August and the drift time of oil to this area is 1-3 days. During September-February the probability is lower (5-25%) for the vast majority of the area and the drift time is also 1-3 days
- The probability that the Dutch NL 2008001 *Doggerbank* may be hit, is 5-25 % for both seasons and with a drift time of 1-3 days during March-August and 3-7 days during September-February
- The probability that the UK SAC, UK0030352 *Doggerbank* will be hit is 5-25% March-August and the drift time to this area is drift time 3-7 days. In September-February the probability is only 1-5% and the drift time 7-14 days for the vast majority of the area.

Table 11-5 Results of oil OSCAR spill modelling of an unmitigated oil spill following a blow out at Hejre. Probabilities that the German, Dutch and UK Natura 2000 (SAC) sites south of Hejre are hit by oil and drift time of oil to site (the modelled drift time is shown in Figure 11-1).

| Season | Site | Probability that the area may be hit by oil | Drift time from blow out to site |
|--------------------|-----------------------|---|----------------------------------|
| March-August | DE 1003301 Doggerbank | 25-50 % | 1-3 days |
| | NL 2008001 Doggerbank | 5-25 % | 1-3 days |
| | UK0030352 Doggerbank | 5-25 % | 3-7 days |
| September-February | DE 1003301 Doggerbank | 25-50 % | 1-3 days |
| | NL 2008001 Doggerbank | 5-25 % | 3-7 days |
| | UK0030352 Doggerbank | 1-5 % | 3-7 days |

The basis for the designation of the three areas are the habitat type 1110 *Sandbanks* and the habitat species 1351 *Harbour porpoise*, 2032 *white beaked dolphin*, 2618 *minke whale*, 1365 *Harbour seal* and 1364 *Grey seal*.

Impacts on cetaceans

Comparatively little is known about the effects of oil on cetaceans (whales, dolphins and porpoises) but based on scant records of cetacean mortality associated with oil spills, it has been suggested that an oil spill may only affect small numbers of cetaceans. Several authors suggest that the threat of most immediate concern is inhalation of evaporated volatile toxic components from the oil slick on the sea surface if they emerge at the surface to breathe in the middle of an oil slick.

This risk is greatest near the source of a fresh spill because volatile toxic vapours evaporate and disperse relatively quickly. When concentrated vapours are inhaled, mucus membranes may become inflamed, lungs can become congested, and pneumonia may ensue. Inhaled fumes from oil may accumulate in blood and other tissues, leading to possible liver damage and neurological disorders. As porpoises rely on blubber for insulation, their thermoregulatory ability does not seem seriously hampered by contact with oil. (Helm et al. 2015).

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It cannot be excluded that harbour porpoises in the Central North Sea may be affected in the unlikely incidence of a blowout at Hejre. However, as the oil slick during a blowout is transported in a relatively narrow band in the direction of the currents and as the density of porpoises is relatively low (0.01-8 individuals/km² (cf. Figure 18-2), only a tiny fraction of the populations of harbour porpoise in the North Sea is likely to be affected. It is therefore not likely that a potential oil contamination from a blowout will significantly affect the population sizes of the harbour porpoises in the North Sea.

Impacts on seals

Seals may be affected by direct contact with oil in a variety of ways. Oil can coat all or portions of their body surface and they may inhale toxic fumes of hydrocarbons, which affects their lungs. In addition, they may ingest oil directly or ingest oil-contaminated prey. As seals rely on blubber for insulation their thermoregulatory ability does not generally seem seriously to be hampered by contact with oil. However, observations suggest that some individuals have become so encased in oil that they were not able to swim and subsequently drowned. In addition, observation also suggest that eyes, oral cavity, respiratory surfaces and urogenital surfaces are particularly sensitive to contact with oil (Helm et al. 2015).

It cannot be excluded that seals in the German, Dutch and UK Natura 2000 areas may be affected. However, as the oil slick during a blowout is transported in a relatively narrow band in the direction of the currents and as seals are relatively rare in the Central North Sea only a tiny fraction of the populations of seals is likely to be affected. It is therefore unlikely that a potential oil contamination from a blowout will significantly affect the population sizes of the seals.

Impacts on European sturgeon

Due to the rarity of European sturgeons, especially offshore, the lack of breeding habitat near Hejre and the short-term effect of disturbance due to this project, it is assessed that a potential blow-out will not cause a deterioration or destruction of breeding or resting sites for this Annex IV-species. Further sturgeons breed in rivers and eggs or larvae can therefore not be affected.

Impacts on habitat type 1110 sandbanks and species-rich gravel, coarse sand and shell layers

Oil may be incorporated in plankton or aggregate with marine snow and thus settle on the habitat type 1110 *Sandbanks which are slightly covered by sea water all the time*, especially in the German area, thereby affecting the benthic infauna community that has been characterised as a *Bathyporeia-Fabulina* (Amphipod-Tellina) community, with the crustacean *Bathyporeia elegans* and the bristle worms *Spiophanes bombyx* and *Spio decorata* as characterising species. However, given that fact that the risk of a blowout occurring is extremely low and that 60 % of the oil will have evaporated by the time it hits the area the risk is negligible.

11.1.10.2 Impacts on Danish Natura 2000 areas

In case of a blowout, Danish Natura 2000 areas east and north-east of Hejre may be hit by oil to a larger and lesser extent dependent on distance from the blowout and the position in relation to the axis of the prevailing direction of the oil slick drift. The different sites can be grouped in terms of risk of being hit by oil and drift time as follows (Table 11-6):

- DK00VA257 *Jyske Rev Lille Fiskebanke*, K00VA259 *Gule Rev*, DK00VA258 *Store Rev* and DK00FX112 *Skagens Gren og Skagerrak* are situated with increasing distance from Hejre in the prevailing direction of the oil slick drift. There is a modelled probability of 5-25 % that these areas will be hit by oil during March-August and the drift time from Hejre to *Jyske Rev Lille Fiskebanke* will be 3-7 days, 7-14 days from Hejre to *Gule Rev* and *Store Rev* and 14-21 days to *Skagens Gren og Skagerrak*.

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- DK00VA301 *Lønstrup Rødgrund*, DK00VA348 *Thyborøn Stenvolde*, DK00EX023 *Agger Tange* and DK00VA340 *Sandbunker ud for Thyborøn* are located outside the axis of the prevailing drift direction at quite large distances from Hejre. The risk that these areas are hit by oil is very small (i.e. 1-5 % probability) and the drift time from Hejre in the range 14-21 days.
- Oil will basically not enter DK00VA347 *Sydlige Nordsø* (probability <1%). However, there is a 1-5 % probability, that oil may enter in two very small areas in the westernmost part of the area.

The probability that the Natura 2000- areas are being hit by oil is smaller during September-February (the modelled drift time is shown in Table 11-6).

Table 11-6 Results of OSCAR oil spill modelling following an unmitigated blow out at Hejre. Probabilities that Danish Natura 2000 sites are hit by oil and drift time of oil during March-August and September-February in case of seabed release. Surface release is identical in terms of probability and drift time. (the modelled drift time is shown in Figure 11-1).

| Season | Site | Probability that the area will be hit by oil | Drift time from blow out to site |
|--------------------|---------------------------------------|--|----------------------------------|
| March-August | DK00VA257 Jyske rev, Lille Fiskebanke | 5-25 % | 3-7 days |
| | DK00VA259 Gule Rev | 5-25 % | 7-14 days |
| | DK00VA258 Store Rev | 5-25 % | 7-14 days |
| | DK00FX112 Skagens Gren og Skagerrak | 5-25 % | 14-21 days |
| | DK00VA301 Lønstrup Rødgrund | 1-5 % | 14-21 days |
| | DK00VA348 Thyborøn Stenvolde | 1-5 % | 14-21 days |
| | DK00EX023 Agger Tange | 1-5 % | 14-21 days |
| | DK00VA340 Sandbunker ud for Thyborøn | 1-5 % | 14-21 days |
| | DK00VA347 Sydlige Nordsø | < 1 %* | |
| September-February | DK00VA257 Jyske rev Lille Fiskebanke | 5-25 % | 3-7 days |
| | DK00VA259 Gule rev | 1-5 % | 7-14 days |
| | DK00VA258 Store Rev | 1-5 % | 7-14 days |
| | DK00FX112 Skagens Gren og Skagerrak | 1-5 % | 7-14 days |
| | DK00VA301 Lønstrup Rødgrund | < 1 % | |
| | DK00VA348 Thyborøn stenvolde | < 1 % | |
| | DK00EX023 Agger Tange | < 1 % | |
| | DK00VA340 Sandbunker ud for Thyborøn | < 1 % | |
| | DK00VA347 Sydlige Nordsø | < 1 % | |

*There is a 1-5 % probability, that oil may enter in two very small areas in the westernmost part of the area

The basis of the designation of these Natura 2000 areas are listed in Table 11-7. The table also provides an overview of the assessments of impacts on the habitat types and habitat species in the areas.

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Table 11-7 Assessment of impact on habitats and species that are basis for the designation of Danish Natura 2000 that may be affected by oil spill, in the unlikely event of a blow out at Hejre.

| Natura 2000 area | Basis for designation | Assessment of impacts resulting from an unmitigated blowout at Hejre |
|---|--|--|
| DK00VA257 <i>Jyske Rev Lille Fiske-banke</i> | 1170 Reef 1351 Harbour porpoise | Negligible risk of impacts on reef Negligible risk of harmful effects on Harbour porpoise (cf. text above) |
| DK00VA259 <i>Gule rev</i> | 1170 Reef 1351 Harbour porpoise | Negligible risk of impacts on reef Negligible risk of harmful effects on Harbour porpoise (cf. text above) |
| DK00VA258 <i>Store rev</i> | 1170 Reef 1351 Harbour porpoise | Negligible risk of impacts on reef Negligible risk of harmful effects on Harbour porpoise (cf. text above) |
| DK00FX112 <i>Skagens Gren og Skagerrak</i> | 1110 Sandbanks which are slightly covered by sea water all the time 1180 Submarine structures made by leaking gases 1351 Harbour porpoise 1365 Harbour seal | Negligible risk of impacts on sandbanks and submarine structures Negligible risk of harmful effects on Harbour porpoise and Harbour seal (cf. text above) |
| DK00VA301 <i>Lønstrup Rødgrund</i> | 1170 Reef 1351 Harbour porpoise | Negligible risk of harmful effects on reef Negligible risk of harmful effects on Harbour porpoise (cf. text above) |
| DK00VA348 <i>Thyborøn Stenvolde</i> | 1170 Reef 1351 Harbour porpoise | Negligible risk of harmful effects on reef Negligible risk of harmful effects on Harbour porpoise (cf. text above) |
| DK00EX023 <i>Agger Tange</i> | 19 different species of seabirds including species of terns, ducks and wading birds. | Negligible risk of harmful effects on birds (cf. text above) |
| DK00VA340 <i>Sandbunker ud for Thyborøn</i> | 1110 Sandbanks which are slightly covered by sea water all the time 1351 Harbour porpoise | Negligible risk of harmful effects on sandbanks Negligible risk of harmful effects on Harbour porpoise (cf. text above) |
| DK00VA347 <i>Sydlige Nordsø</i> | 1110 Sandbanks, which are slightly covered by sea water all the time 1351 Harbour porpoise 1365 Harbour seal 1364 Grey seal Red-throated diver, Black-throated diver and Little gull | Will not be affected |

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Impacts on marine mammals

Harbour porpoise and seals are included in the basis for designation in eight of the nine potentially affected Danish Natura 2000 areas. As described above, impacts on harbour porpoise may primarily be caused by toxic fumes from the oil slick on the surface.

Except for DK00VA257 *Jyske rev, Lille Fiskebane* the oil will have drifted a week or more upon arrival to the potentially Danish affected Natura 2000 areas (Table 11-7). Within a week, the toxic fumes will have evaporated.

The drift time to *Jyske Rev* has been estimated at 3-7 days, so most toxic fumes have probably evaporated especially during March-August. In addition, the oil slick is transported in a relatively narrow band in the direction of the surface currents, hence the risk that a porpoise encountering an oil slick is low.

Seals are included in the basis for the designations of the Danish Natura 2000 areas DK00FX112 *Skagens Gren og Skagerrak*.

The drift time to DK00FX112 *Skagens Gren og Skagerrak* is 14-24 days at which time the oil will mostly be in the form of tar balls, which are unlikely to harm seals. The risk that oil is reaching DK00VA347 *Sydlige Nordsø* is low (probability 1-5 %) and with a drift time of 7-14 days any toxic oil components would have evaporated.

It is therefore assessed that the risk of harmful impacts of an unmitigated oil blowout at Hejre on harbour porpoises and seals within the Danish Natura-2000 areas is negligible.

Impacts on seabed habitats

The basis for designation at all sites except DK00EX023 *Agger Tange*, includes a seabed habitat (either 1170 Reef or 1110 Sandbanks). The drift times to DK00VA *Jyske Rev Lille Fiskebane*, DK00VA259 *Gule Rev*, DK00VA *Store Rev* are in the range 3-14 days (Table 11-6). The sedimentation of oil components is at its maximum after a drift time of a week (Cf. Table 11-6). Consequently, there may be a risk that the seabed habitats in these areas to some extent may be affected by settled oil. However, the risk is relatively low (probability 5-25%).

The probability that DK00FX112 *Skagens Gren og Skagerrak* is hit by oil is also 5-25 %, but the drift time is larger (14-21 days), so any sedimentation of oil will be less.

The probability of oil entering the remaining areas are even lower i.e. 1-5 % (5-25 %, so the risk of impacts on seabird is therefore assessed to be negligible.

Impacts on birds

Species of seabirds are included in the basis for designation of DK00EX023 *Agger Tange*.

Seabirds are very vulnerable to oil spill because they often are in contact with surface water and exposure to the sticky oil destroys the buoyancy and the isolating quality of the plumage. Birds smothered in oil will usually die of cold, starvation or drowning. Seabirds that stay on the sea surface for longer periods are mainly at risk, but all types of seabirds may be affected.

However, the probability of an oil slick entering the area is low (1-5 %) and the drift time has been modelled to 14-21 days (Table 11-6). By this time the oil will be weathered so much that it is not sticky or toxic and therefore much less damaging to birds than fresher oil. Risk of impacts on seabird is therefore assessed to be negligible.

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11.1.11 Conclusion

It is concluded that the Hejre tie-back to South Arne development will not negatively affect the conservation status of habitats and species, for which potentially affected Natura 2000 sites have been designated as well as species listed on Annex IV of the EU Habitats directive (Directive 98/43/EEC of 21 May 1992). Nor will the re-development affect the integrity of the areas negatively.

The conclusion is based on following arguments:

- The risk that a blowout occur is extremely low since all safety systems and measures are in place on the platform.
- The oil slick is transported in a relatively narrow band in the direction of the surface currents.

The INEOS oil spill contingency plan (INEOS Oil and Gas, 2022) will be activated, and oil spill combat will be carried out, which will reduce the spreading of oil and mitigate impacts of any spill, see section 11.4 below.

11.2 Environmental impacts of gas released during a blowout

In the unlikely event of a blowout at Hejre, gas may also escape from the formation.

In general, the extent of environmental impacts of escaped gas is not comparable to the impact of oil blowouts. The bulk of the gas, bubbles to the surface and escape to the atmosphere within a relatively small area around the platform and does not disperse in the water to the same extent as oil. On the other hand, field and laboratory investigations have demonstrated that severe environmental impacts may be observed in the immediate vicinity of the platform. The investigations clearly proved that severe damages and mass mortality on zooplankton, benthic fauna and fish might occur within the small gas affected area (Table 11-8).

Although gas blowout has smaller environmental impacts than oil blowouts, the gas may pose a severe safety risk for personnel on rig, platform and vessels. If the gas ignites and causes fires or explosions, installations and equipment will be damaged and in case personnel is not evacuated in due time, injuries or loss of life of personnel may occur. However, the risk of this is minor due to technical safety features on the platform that prevent blowout from happening. During an unlikely situation, the existing contingency arrangements involving evacuations of personnel from platforms will minimise the risk even further.

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Table 11-8 Field-and laboratory studies on impacts of methane gas in the marine environment.

| Study | Observations | References |
|---|--|---------------------------------|
| Field survey in connection with a gas blowout at drilling rigs in the Azov Sea summer/autumn 1982 and in 1985 | <p>95 % of the escaped gas was methane.</p> <p>The concentration of methane in the vicinity of the well was 4-6 mg/l. The concentration had decreased to 0.07-1.4 mg/l 200 m from the well.</p> <p>In areas with a high concentration of methane, the biomass of benthos declined. Some declining of the zooplankton biomass also occurred in the vicinity of the accidental well</p> <p>Fish in the vicinity of the well clearly developed significant intoxication symptoms such as impaired movement coordination, weakened muscle tone, pathologies of organs and tissues, damaged cell membranes, disturbed blood formation, modifications of protein synthesis, radically increased total peroxidase activity, and some other anomalies typical for acute poisoning of fish.</p> | Glabrybvod 1983 AzNIRKH 1986 |
| Laboratory investigations of impacts of natural gas on fish | Fish clearly avoided concentrations of dissolved gas of 0.1-0.5 mg/l | Sokolov and Vinogradov 1991 |
| Laboratory investigations of acute toxicity of natural gas on fish and zooplankton | 48h LC ₅₀ for fish = 1-3 mg/l 96h LC ₅₀ for zooplankton = 5.5 mg/l | Umorin et al 1991 |
| Laboratory investigations of acute toxicity of natural gas on zooplankton, benthic fauna and fish fry | 96h LC ₅₀ for zooplankton, benthic fauna and fish fry = 0.6-1.8 mg/l | Borisov et al 1995 |
| Laboratory investigations of impacts of natural gas on fish | Exposure to 1 mg/L and above induced intoxication symptoms (Impaired movement coordination, impaired oxygen absorption, disorientation. Lethal effects were observed after two days. | Patin 1993 |

11.3 Environmental impacts of pipeline rupture

Rupture of pipelines may occur as a result of corrosion or damage caused by trawlers. This applies for the new pipeline as well as the pipelines previously covered in the Hejre Legacy EIA. Still however, the risk of spills of larger amounts of oil or gas in case of rupture is minor.

Pipeline pressure is continuously monitored from the production platform. In case of pressure drop, the system closes. In addition, any spills are dealt with in accordance with the oil spill contingency plan for INEOS' offshore operations from March 2022 (INEOS Oil & Gas DK 2022).

11.3.1 Modelled dispersion of oil during pipeline rupture

11.3.1.1 Spreading of oil

The unlikely event of subsea leakage from rupture of the longest pipeline has been modelled for Hejre to Siri tie-back (HESI-DNVI-S-RA-00002). This modelling is viewed as a conservative scenario, as the Hejre tie-back to South Arne will have a shorter pipeline with potentially fewer leakage points and thus overall lower risk for leakage. Figure 11-7 shows the modelled probability that a subsea leakage from pipeline rupture will be hit by ≥ 1 % of 1 tonne of oil per 10 x 10 km grid cells during March-August) and September-February, respectively.

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It is seen that released oil during pipeline rupture will be transported with the prevailing current towards the North-eastern part of the Norwegian and Danish part of the North Sea. In the unlikely case of unmitigated pipeline rupture, the hit probability in Danish waters is above 94 % in the vicinity of the release location. In Norwegian waters the hit probability is 75-95 % during summer and 50-75 % during winter. For all other neighbouring countries including Natura 2000 areas (SACs) the hit probability is 0-50 %. The model shows that even for an unmitigated spill, the risk of oil stranding on coasts is 0 %. This means that there will be no stranding of oil in coastal areas such as the Wadden Sea in Germany, the west coast of Jutland or the Norwegian coast.

Figure 11-7 shows the seasonal resolution of arrival times from pipeline rupture within the influence area to 10 x 10 km grid cells (drift time).

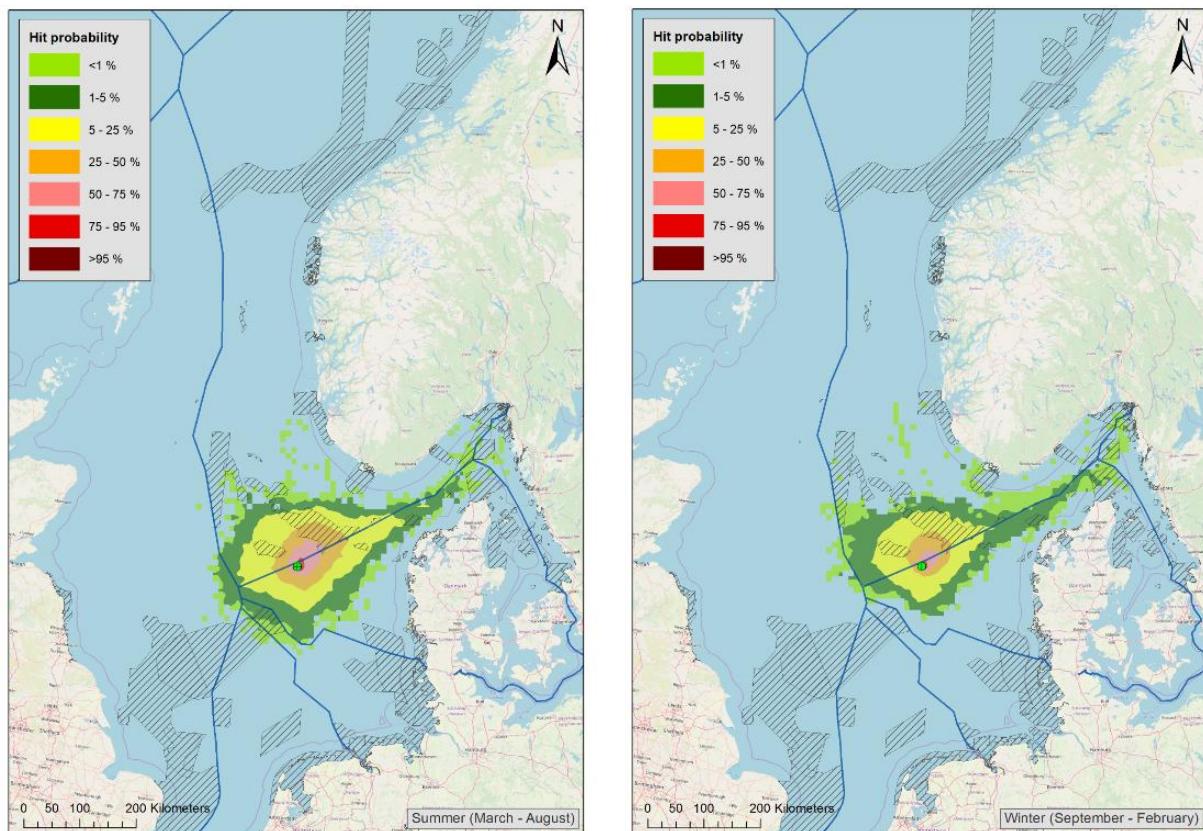


Figure 11-7 Result of stochastic oil spill modelling of a worst case, unmitigated release of oil during a full pipeline rupture at Siri during March-August (left) and September-February (right). The figures show the modelled probability that the sea surface in 10x10 km grid cells will be hit by more than 1 tonnes of oil. The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

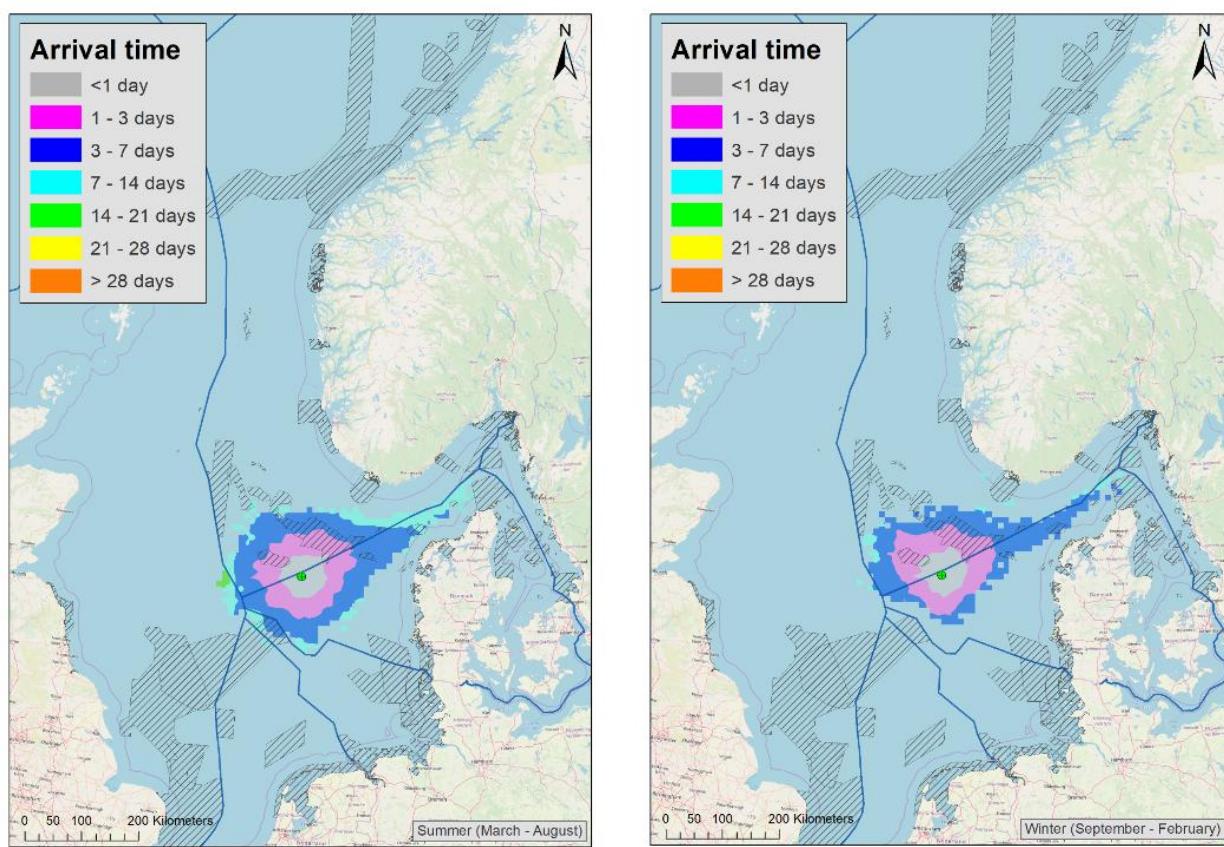


Figure 11-8 Result of stochastic oil spill modelling of a worst case, unmitigated release of oil during a pipeline rupture of the Hejre tie-back to Siri development during March-August (left) and September-February (right). The figures show the shortest arrival times (since start of the release) within the influence area to 10 x 10 km grid cells. The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

Figure 11-9 shows that there will be <5 tonnes of oil per 100 km² in the North-eastern part of the closest SAC during summer and no detectable oil during winter.

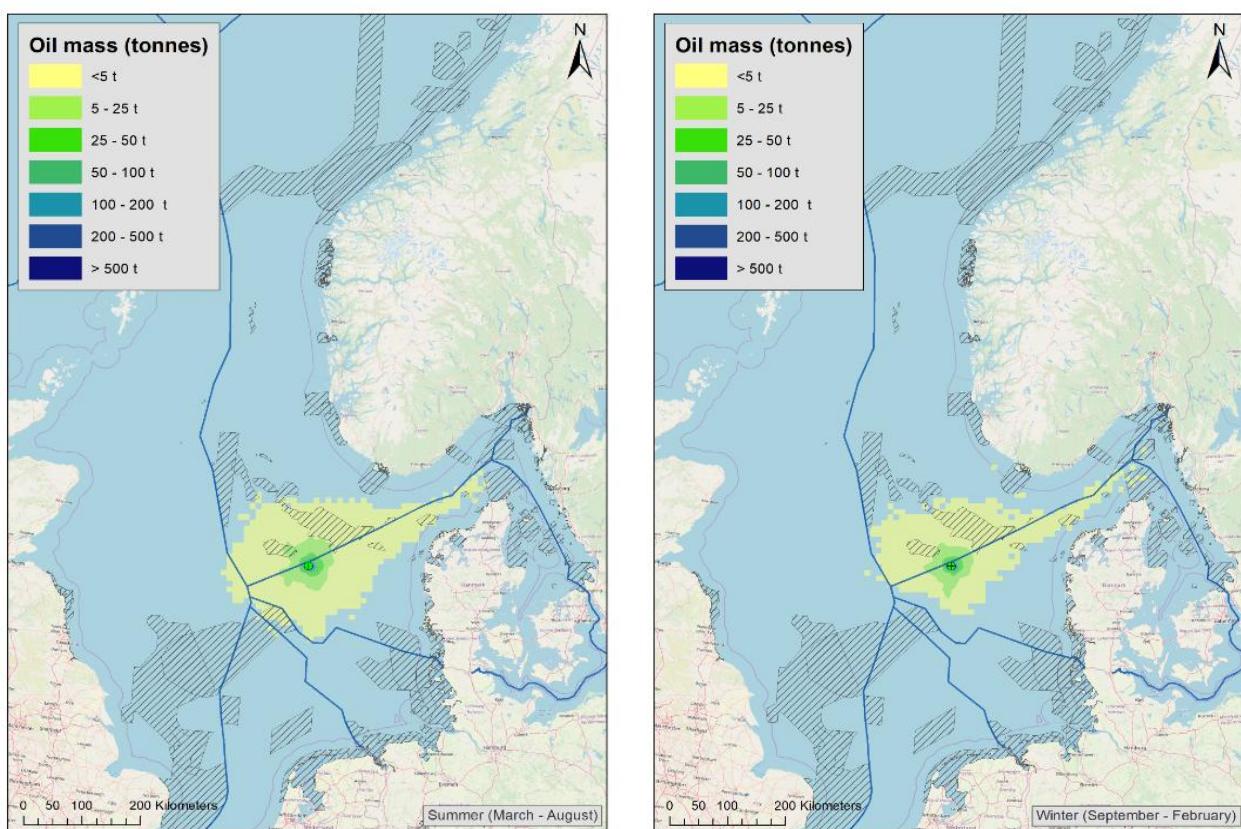


Figure 11-9 Seasonal oil mass within the influence area in 10 x 10 km grid cells during a pipeline rupture of the Hejre tie-back to Siri development during March-August (left) and September-February (right). The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

11.3.2 Impact on seabirds of oil during pipeline rupture

As addressed in section 11.1.5 birds are extremely vulnerable to oil spills, and they are often killed if occurring within the area of an oil spill. Oil spill from pipeline rupture impact a much smaller area than an oil blowout (green area on Figure 11-9). In the unlikely event of an unmitigated pipeline rupture, seabirds occurring in the vicinity of the pipeline will be affected. The oil will be transported with the current towards the internationally important bird area in the Norwegian part of the North Sea. However, most of the oil will have evaporated at the time of arrival and the oil sheen thickness will most likely be so thin that birds will survive.

Marine habitat areas off and along the coast of Denmark, Norway, Sweden, Germany, The Netherlands and United Kingdom will not be affected by a pipeline rupture.

11.3.3 Impact on marine mammals of oil during pipeline rupture

The modelling shows that oil spill from pipeline rupture may reach areas where harbour porpoise, grey seals or harbour seal may be encountered. However, since the influence area is limited to a relatively small area in the vicinity of the pipeline and since marine mammals in general are robust to oil spills (threshold is ca. 10 µm for seals and 100 µm for cetaceans, French-McCay 2009) only a small number of the North Sea populations of cetaceans and seals is expected to be negatively affected. Based on this is assessed that the impact of an unmitigated oil spill from pipeline rupture on harbour porpoise and seals is negligible. The effect of oil spill on marine mammals is described in more details in section 11.1.6.

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11.3.4 Impact on fish eggs- and larvae of oil during pipeline rupture

Eggs and larvae are considered the most sensitive life stages of fish in terms of acute impacts of spilled oil. The Norwegian Oil Industry Association use 25 ppb as the THC concentration at which fish eggs- and larvae and other sensitive marine life begin to be affected by oil components (see also section 11.1.7). THC concentration does not exceed 25 ppb given a 10 x 10 km grid cell resolution and therefore fish eggs and larvae are not expected to be affected by oil during pipeline rupture.

European sturgeon eggs are not at risk, because the species breed in rivers.

Figure 11-10 shows the probability of oil released during pipeline rupture will strand. The calculations show no hit probability during summer season. During winter there is <1 % stranding probability at the south coast of Norway. There is no hit probability elsewhere.

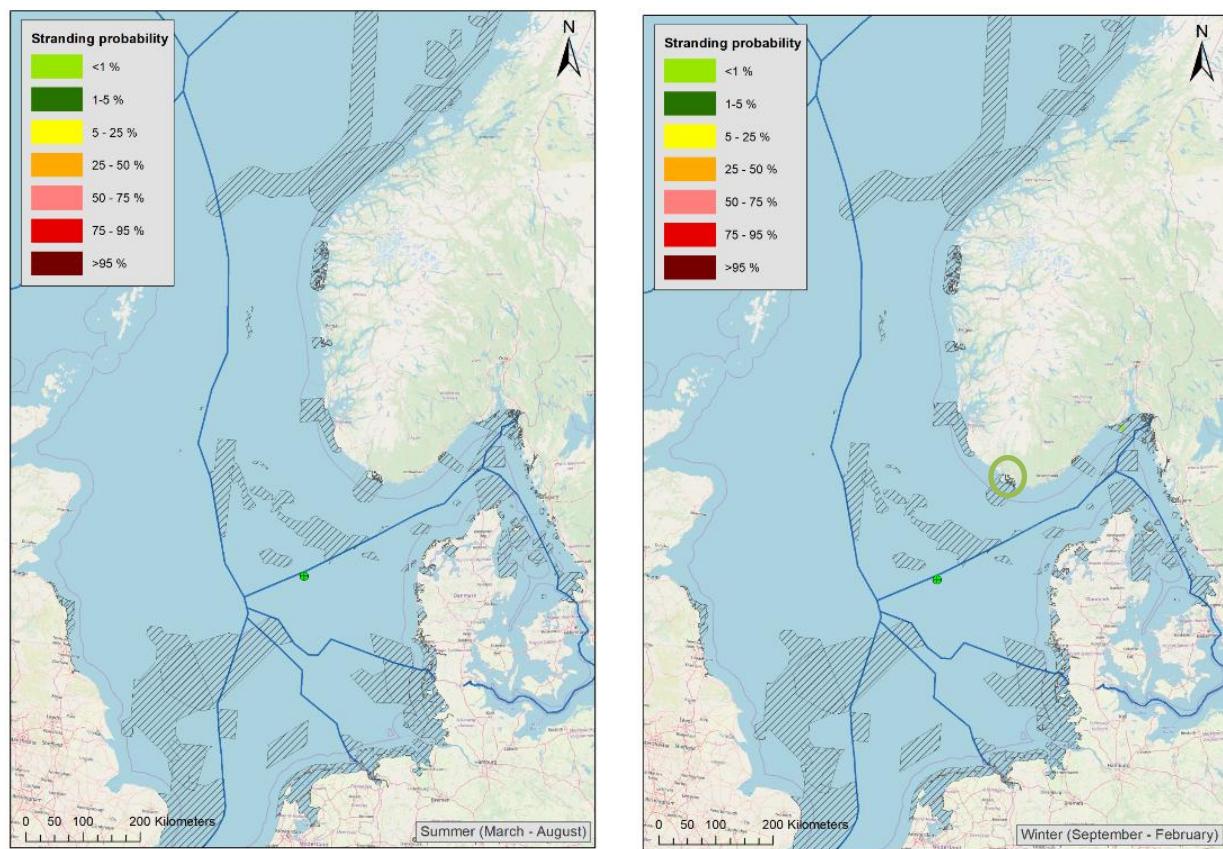


Figure 11-10 Result of stochastic oil spill modelling of a worst case, unmitigated release of oil during full pipeline rupture at the Hejre tie-back to Siri development during March-August (left) and September-February (right). There is a stranding probability of <1% in Norway (light green area in red circle). The figure shows the shortest arrival times (since start of the release) within the influence area to 10 x 10 km grid cells. The hatched areas show Natura 2000 areas (SACs) in territorial waters of EU countries and SVO areas (valuable and vulnerable areas) in Norwegian waters.

11.3.5 Impact on Norwegian SVOs

The modelling shows that Norwegian SVOs may be hit by oil in case of an unmitigated pipeline rupture (Figure 11-1 and Figure 11-2) i.e.:

- Sand eel field South may be hit by oil from pipeline rupture. The hit probability has been estimated to 25-50% during summer; drift time <1 day. The Sand eel field South is spawning and foraging areas for sand eel (*Ammodytes* sp.). Furthermore, the Sand eel fields South is a valuable habitat for common

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guillemot (*Uria aalge*) and northern fulmar (*Fulmaris glacialis*) from April to December. The model results show that the concentration of oil in these areas are less than 25 ppb, which is below concentrations that are harmful to fish eggs and larvae (cf. 11.1.7) so spawning in this area is not at risk.

- The SVO “Makrellfelt”, which is a spawning area for mackerel from May to July has no hit probability.

11.3.6 Impact on SACs (Natura 2000 sites)

The oil spill modelling of a pipeline rupture shows it is very unlikely that Natura 2000 areas will be hit by oil. The hit probability within the German SAC DE 1003301 Doggerbank is thus < 1 %. DE 1003301 is designated to protect sandbanks, reefs and different species of fish and marine mammals (see further description in section 11.1.10). SACs in the Netherlands, UK and Denmark show no hit probability. Based on the low hit probabilities in neighbouring SACs it is assessed that that pipeline rupture will not significantly impact the basis of the designation of these areas.

11.4 Oil spill contingency plan

The modelling and assessments described above, are made under the assumption that all safety systems on the platform fail and that oil spill combat actions are not taken. In case of an uncontrolled blowout or other types of spill INEOS's oil spill contingency plan will be activated, which will significantly mitigate the impacts of spills (INEOS Energy 2024).

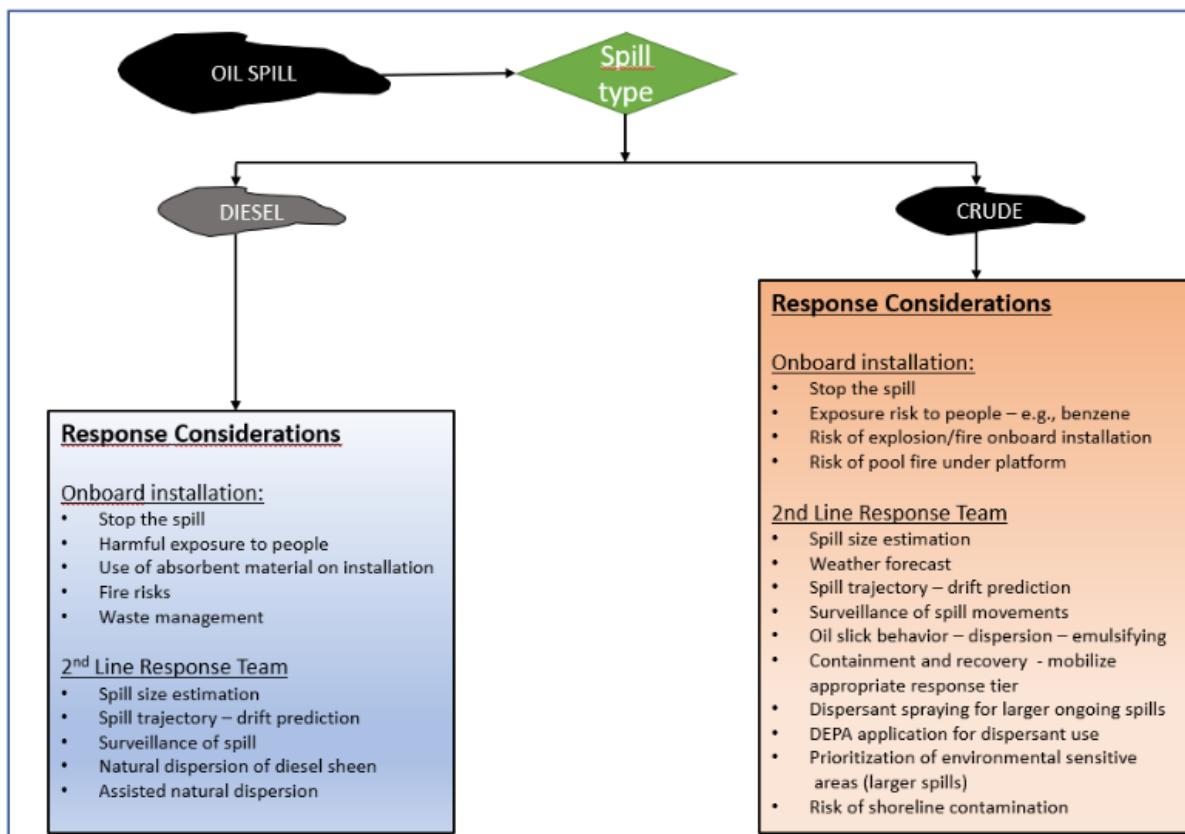


Figure 11-11 General response techniques consideration and strategy options (from INEOS Energy Oil spill contingency plan, 2024).

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INEOS has established a legally binding cooperation arrangement with Total E&P Denmark for mutual assistance in case of an oil spill incident from one of the operator's production installations. This arrangement ensures that four containerized DESMI (provider of pumps and systems for oil spill) fast sweep oil collection systems will be available for containing and collecting spilled oil, depending on the magnitude of the spill. In case of a blowout further oil spill mitigation resources will be provided by Oil Spill Response Ltd (OSRL).

Oil spill contingency plans are thus in place and implemented. The plans are forwarded to Authorities for approval. In Denmark, the preferred response strategy is containment and recovery of spilled oil. Dispersant spraying may be used, subject to a case-by-case approval from the DEPA. Details on the specific equipment available for the preferred response strategy (mechanical containment and recovery) for the three tier responses are outlined in Figure 11-12 and Table 11-9.

| TIER 1 | TIER 2 | TIER 3 |
|--|--|---|
| Oil spills are likely to be small and effect a localized area. The spill can be managed by using INEOS pre-arranged PSV resources. 1 containment and recovery strike team onboard Guard vessel Esvagt Innovator. | A spill incident in which TOTAL response resources and support are required to control the spill Additional offshore containment and recovery equipment (2 C&R strike teams provided by Total Energies) | An incident where assistance is required from international (OSRL). Dedicated industry Tier 3 response center and resources. |
| Characteristics | Characteristics | Characteristics |
| Spill occurs within immediate site proximity and is likely above 5 m ³ or deemed combatable. Spill can be easily managed using response resources available on site. The spill source has been secured. | Spill extends beyond the immediate site proximity. Tier 1 resources are overwhelmed. Spill source cannot be immediately secured. | Uncontrolled Well blowout/ large ongoing spill. Large spill has crossed international maritime boundaries. Tier 1 and Tier 2 resources are overwhelmed. |

Figure 11-12 Characteristics of the Tier 1, Tiers 2 and Tier 3 oil spills (INEOS Energy 2024)

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Table 11-9 Characteristics of the Tier 1, Tiers 2 and Tier 3 oil spills and available resources for combatting the three types of spill (INEOS Energy 2024)

| Tier 1 Resources: Local / INEOS | |
|---|--|
| C &R | <p>One containerized DESMI Speed Sweep 1500 system (swath width 25 m) with an in-built Ro-Skim 1500 skimmer connected to a DOP 250 pump system (nameplate capacity: 100-125 m³/hour). The sweep system is operated along with a DESMI Ro-Kite 1500 allowing operation of the sweep system by one vessel.</p> <p>Limitations: Wave height: 3.5mtr, Ocean current: 3kts. Operational temp: -35 to 70degC</p> <p>For additional system details, please refer to Appendix 7 section 3.2.1.</p> <p>The system is stored permanently on a supply vessel - ready for immediate deployment. Vessel liquid storage capacity for recovered oil: 1200m³</p> <p>The equipment is owned by INEOS.</p> |
| Surveillance | <p>Aerial Surveillance by helicopter or support vessels INEOS oil spotter and/or OSRL observer.</p> <p>Drift forecast modelling "Seatrack Web".</p> <p>OSRL oil spill modelling and OSRL Satellite imagery</p> |
| Tier 2 Resources: Regional /National TOTAL | |
| C&R | <p>One containerized DESMI Speed Sweep 1500 system with in-built skimmer (same for Tier 1).</p> <p>The system is stored permanently on a vessel – ready for immediate deployment.</p> <p>Vessel has a storage capacity of min. 510m³</p> <p>One containerized DESMI Speed Sweep 1500 system with in-built skimmer (as for Tier 1). The system is stored on a TOTAL offshore installation. In case of mobilization the system it will be loaded on a suitable vessel-</p> <p>The two systems are owned by TOTAL.</p> |
| Surveillance | <p>Aerial Surveillance by crew change helicopter or support vessels and OSRL observer.</p> <p>Drift forecast modelling "Seatrack Web".</p> <p>OSRL oil spill modelling and OSRL Satellite imagery</p> |
| Tier 3 Resources: International / OSRL | |
| C&R | <p>OSRL is Tier 3 Provider for INEOS. Appendix 4 and : Readiness Dashboard Oil Spill Response lists OSRL equipment.</p> <p>OSRL has a variety of booms and skimmer systems including fast sweep systems that can be operated by one vessel. Provision of personnel to operate the equipment and manage the the incident is a part of the service.</p> <p>INEOS will charter suitable vessels on the day.</p> |
| Surveillance | <p>Aerial Surveillance by helicopter or support vessels and OSRL observer.</p> <p>Drift forecast modelling "Seatrack Web".</p> <p>OSRL oil spill modelling and OSRL Satellite imagery</p> |
| Dispersant | <p>Subject to DEPA approval before use. See relevant dispersant chemicals in Appendix 19 OSRL Spray equipment and dispersant supplied by OSRL.</p> <p>Suitable vessels will be chartered one the day by INEOS.</p> |

11.5 Risk assessment of accidental spills

Based on the above and using the criteria described in section 7, it is assessed that the environmental risks related to accidental spills during construction and operation of Hejre is **Low to Negligible** (Table 11-10).

Table 11-10 Environmental risk of accidental spills during operation of Hejre.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Likelihood of impact | Environmental Risk |
|---------------------------------------|----------------------------|---------------------------|----------------------------|---------------------------|-----------------------------|---------------------------|
| Impacts of oil release during blowout | International | Medium term | Large | Major impact | Very low | Low risk |
| Impacts of gas release during blowout | Local | Short term | Large | Moderate impact | Very low | Negligible risk |
| Impacts of rupture of pipeline | Local | Short term | Moderate | Minor impact | Low | Negligible risk |

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12. Environmental risk of non-indigenous species

The term non-indigenous species means that the species is introduced outside its natural, past or present range (Ministry of Environment and Food 2019). The Vessels used for construction, production and decommissioning activities can potentially introduce non-indigenous species to the North Sea area through marine fouling on vessels or through discharge of ballast water from the vessels.

The Ballast Water Management Convention implemented in Danish law through the Statutory Law on Protection of the Marine Environment (Act No 147 of 19/02/2024) and regulated through the Executive Order on treatment of ballast water and sediments from ships' ballast water tanks (BEK 733 of 19/05/2022) stipulate the requirements for the vessels management of their ballast water. Vessels solely operating in the Danish sea-territory and exclusive economic zone are exempted from the requirements in the Ballast Water Management Convention. Smaller vessels (<400GT) are until 8 September 2024 also exempted.

If the vessel must fulfil the requirements in the Ballast Water Management Convention, it will either be by exchange of their ballast water (D1 exchange standard) or discharge of treated ballast water (D2 discharge standard). Whether the vessel must comply with the D1 or D2 standard depends on the vessels' renewal date of the IOPP certificate. These vessels must comply with the D2 standard on 8 September 2024 at the latest.

Management of biofouling is currently not regulated in the national Danish legislation. However, there may be some regulation and requirements in specific ports when performing in-water cleaning of the vessels. All vessels are expected to be coated with antifouling to reduce marine fouling. In addition, there is an economic incitement to remove marine fouling from the vessels regularly to minimize use of fuels. This incitement does generally not extend to cleaning of the so-called niche area. There will therefore be a risk, although minor risk, for introducing non-indigenous species by the vessels biofouling. This risk is reduced as it is expected the majority of the vessels generally will be operating within the North Sea. It is further expected that the vessels are guided by the non-mandatory "IMO Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species" (Resolution MEPC.207(62)) from 2011, which is currently under review in the IMO.

The presence of oil and gas platforms may also represent a pathway for non-indigenous species. at the platforms may be used as steppingstones during a secondary dispersal. However, as the structures at Hejre and South Arne are already present, there is no additional risk to be evaluated for this EIA.

The severity of a potential impact is theoretically major if the non-indigenous species become established and subsequently invasive. However, based on the arguments above the environmental risk of introduction of invasive species is assessed to be low Table 12-1.

Table 12-1 Risk related to non-indigenous species vessels under construction.

| Impact | Extension of impact | Duration of impact | Magnitude of impact | Severity of impact | Probability of impact | Environmental risk |
|-----------------------------------|---------------------|--------------------|---------------------|--------------------|-----------------------|--------------------|
| Impacts of non-indigenous species | Regional/ national | Long term | Moderate | Major impact | Very low | Low |

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13. Socio-economic assessment

This chapter consists of an assessment of the potential derived socio-economic consequences for the population or the society in the surrounding area, which could arise from the environmental impact of the project. The surrounding area is defined as the entire west coast of Jutland.

13.1 Method

The assessment in this chapter is a general assessment of the derived socio-economic consequences without detailed impact assessments. The analysis does not consider the consequences of the environmental impacts on the staff who visit the platform in connection with operational tasks either.

The assessment of the derived socio-economic consequences is primarily based on the following sources:

- The descriptions of environmental effects in chapter 8, 9 and 11.
- Statistics from the Danish Fisheries Agency and Statistics Denmark concerning the socio-economic importance of fisheries, and the tourist sector in the surrounding area.

13.2 The scope

The proposed project potentially results in several environmental impacts which can bring on either negative or positive changes experienced by local businesses and societal groups or the society. Some of these environmental impacts can potentially lead to socio-economic consequences. The socio-economic consequences considered in this chapter are:

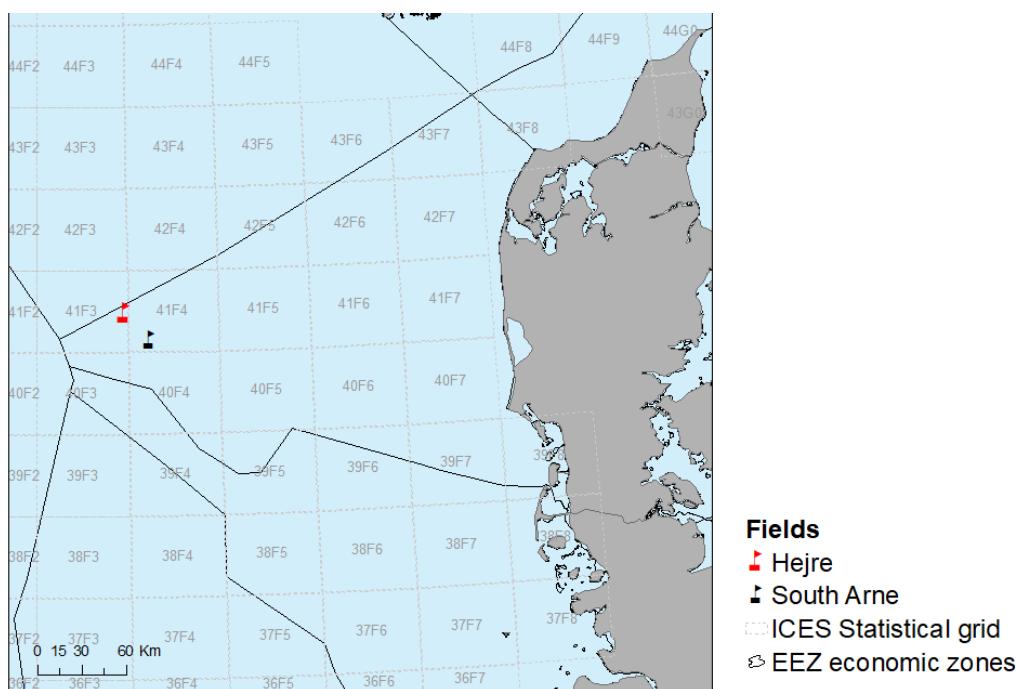
- Changes in fish catches and tourism due to prohibited zones
- Changes in fishing industry and tourism due to accidental oil spill and gas escape
- Changes in employment and tax revenue

The focus of the socio-economic analysis is thus primarily on prohibited zones and accidental oil spills, since these (if they occur) are expected to lead to economic consequences for the local area, such as a decrease in the revenue of the local fishing industry and tourism businesses along the coast. Additionally, the socio-economic analysis will include potential positive impacts related to increase in employment and tax revenues.

13.3 The importance of the commercial fishery and tourism industries today

13.3.1 Extent of commercial fishery in the Hejre re-development area

The Danish AgriFish Agency collects information about the Danish fishing industry using a system defined by The International Council for the Exploration of the Seas (ICES), which divides the north-eastern Atlantic Ocean into geographical rectangles of 60 times 60 nautical miles. Fish catch data to the level of species are collected for each rectangle in the Danish sector. To assess the implications of the Hejre field re-development on the commercial fisheries, fisheries statistics from ICES squares 41F3 41F4 and 40F4 as shown in Figure 13-1, has been used.



In the period 2014-2018, the annual Danish commercial fishery in the Central North Sea amounted to approximately 500,000 tons with an average value of 1,900 million DKK per year in average. In 2011, when the Hejre Legacy EIA was prepared, the annual Danish fishery in the Central North Sea amounted to approximately 477,000 tons with a value of 1,400 million DKK (Fiskeridirektoratet 2010). The extent of annual Danish commercial fishery has thus been fairly constant. As mentioned in Chapter 6, the area around Hejre is of minor importance compared to the total fish catch in the North Sea. Thus, the average value of fish catches around Hejre (ICES square 41F3) is 2.1 million DDK/year, corresponding to 0.1% of the value of the total fish catch in the Central North Sea per year in the period 2014-2018 (See Table 13-1).

Table 13-1 Average annual catch and value of Danish catches in the project area registered by ICES. Based on data 2014-2018. Source: Danish Fisheries Agency 2019.

| ICES | Tons/year | Million DKK/Year | Percent of the value of the total fish catch in the central North Sea |
|------|-----------|------------------|---|
| 41F3 | 299 | 2.1 | 0.1 |
| 41F4 | 7,560 | 11.4 | 0.6 |
| 40F4 | 1,814 | 5.7 | 0.3 |
| Sum | 9,673 | 19.2 | 1.0 |

However, if the entire project area is considered (ICES 41F3, 41F4 and 40F4), fishery is of some importance. The average annual Danish fishery in the project area thus amounts to approximately 9,673 tons with a value of 19.2 million DDK/year, corresponding to 1.0% of the value of the total fish catch in the Central North Sea (See Table 13-1).

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13.3.2 Employment in the fishing sector

According to Statistics Denmark (Statistikbanken.dk 2020), 2,340 people were employed in the fishing sector³ in 2018 in Denmark (exclusive fish shops, auction houses, wholesale etc.), corresponding to 0.1% of all Danish employees. Of them, 1,802 were employed with marine fishing (77%). Hence, marine fishing represents a high proportion of the total employment in the fishing sector in Denmark. However, compared to the total number of employees in Denmark, the number of employees in the fishing sector is small.

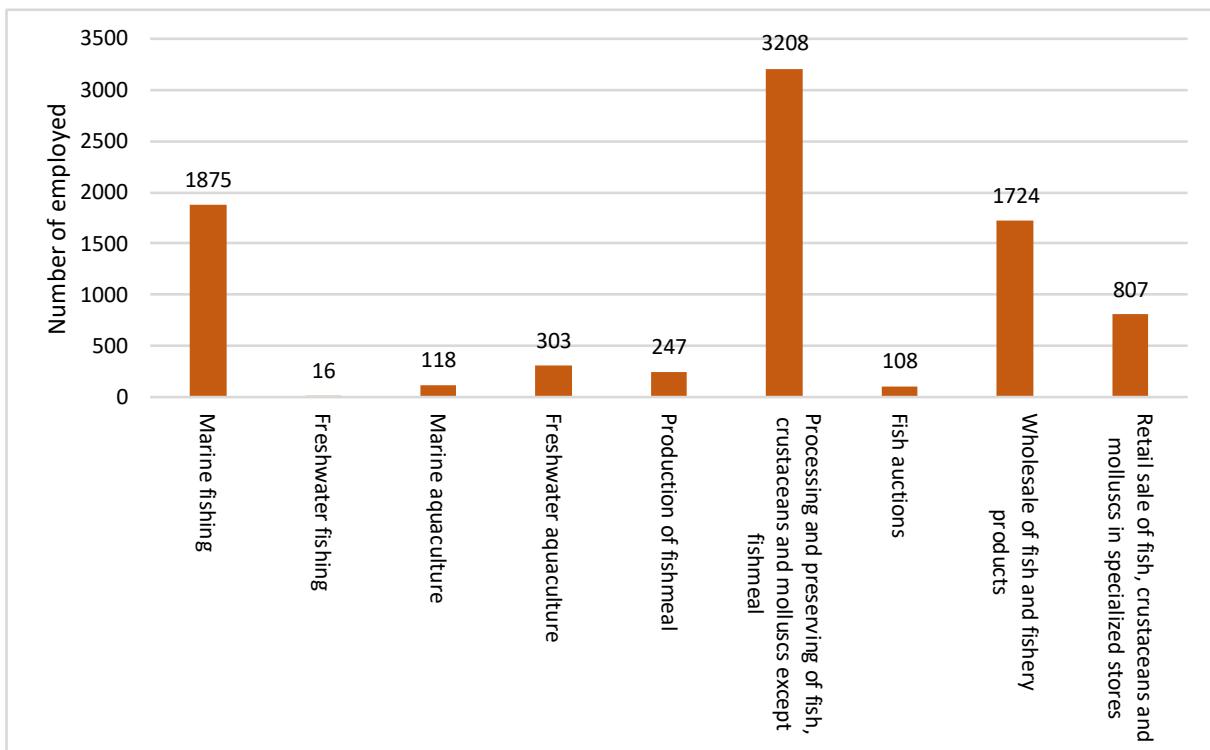


Figure 13-2 Number of people employed in the fishing industry in Denmark in 2013 distributed on sectors.
Source: Danish Fisheries Agency, 2014 (based on Statistics Denmark - Registerbased Labour force Statistic (RAS)).

In 2013⁴ (Danish Fisheries Agency, 2014), most of the employed in the fishing industry (including fish shops, auction houses etc.)⁵ worked in the sector 'Processing and preserving of fish, crustaceans and molluscs except fishmeal', corresponding to 38% of the total employed in 2013 (See Figure 13-2). The second largest sector was 'Marine fishing', and the third largest was 'Wholesale of fish and fishery products'. These two sectors constitute 22% and 21% of the total employed in the fishery sector, respectively.

The processing sector thus plays a particularly important role in the total number of employees in the commercial fishery. In this connection, it should be mentioned that the Danish fishermen's landings form only part of the sector's total supplies of fish catch and raw materials (Danmarks Pelagiske Producentorganisation et al. (2018)).

³ Includes fishing, i.e. fishing catching, collecting and harvesting wildlife aquatic organisms (primarily fish, molluscs and crustaceans) including plants from sea- and coastal inland waters.

⁴ 2013 is the latest data concerning the number of employed in the **total** fishing sector (including shopping).

⁵ The total of this statistic differs from the one mentioned earlier in the text (2,340 people were employed in the fishing industry). It includes fish shops, wholesale trade, auction houses etc.

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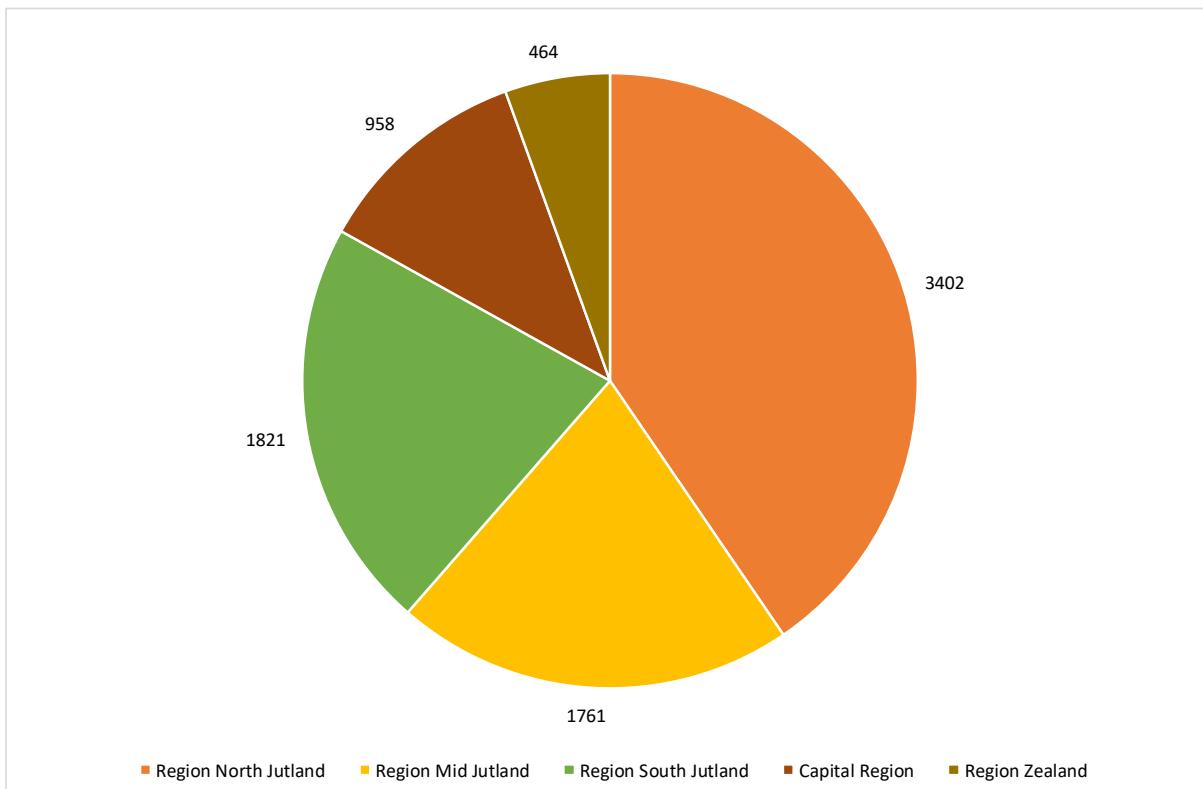


Figure 13-3 Number of people employed in the commercial fisheries sectors in Denmark in 2013 distributed on Regions⁶. Source: Danish Fisheries Agency, 2014.

Commercial fishery is of importance in Jutland, especially in North Jutland (Figure 13-3). Thus, 83% of the total employment in the fishing sector are resident in Region North Jutland, Region Mid Jutland and Region South Jutland, while only 17% are resident in Capital Region and Region Zealand. In case of an oil spill, the commercial fisheries and fishing sector located at the west coast of Jutland, especially North Jutland, is at risk of being economically affected.

13.3.3 Employment in the tourism sector

The tourism industry in Denmark creates about 160,000 jobs, corresponding to 6% of all jobs in Denmark (VisitDenmark, 2019). A major part of these jobs is related to the gastronomical sector and to the retail sector (VisitDenmark, 2019). 38% of the jobs are created in the Capital Region, 20% in Region South Jutland, 18% in Region Mid Jutland, 11% in Region North Jutland, and 10% in Region Zealand.

The gross value added from the tourism industry was 45 billion DDK in 2012 corresponding to 2.4% of the total gross value added in Denmark (VisitDenmark, 2019).

The turnover from coastal and natural tourism accounted for approximately half of the tourist sector's total revenue in 2017 (48%)⁷. Most of this (69%) was generated west of the Great Belt.

⁶The sectors correspond to the sectors mentioned in Figure 13-2.

⁷ Source: Det Nationale Turismeforum, 2019: Statusanalyse af turismens udvikling og konkurrenceevne. November 2019

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13.4 Derived consequences of environmental impacts

13.4.1 Changes in fish catches due to prohibition zones

A safety zone is established around the legacy pipeline from Hejre to Gorm. The new pipeline will largely follow this existing safety corridor, meaning that only approximately 6 km new safety zone will be required. This additional safety zone will extend 200 m on either side of the pipeline route, stretching from the current safety zone to the 500 m safety zone at South Arne. Overall, the new safety zone will cover just 2.4 km², representing only a small fraction of the 41F4 area.

The potential loss of fishing grounds due to the new pipeline's safety zone is minimal when compared to the wider fishing areas in which 41F4 account for just 0.6 % of North Sea catches. Consequently, any reduction in fish catches resulting from the Hejre tie-back to South Arne project is considered insignificant in the context of total catches in the North Sea.

13.4.2 Changes in fishing tourism due to prohibition zones

The prohibition zones will be established at approximately 300 km offshore from the Danish west coast. Tourism is related to the nearshore (and onshore) areas, and thus no impacts of restricted zones on tourism are expected.

13.4.3 Changes in fishing industry and tourism due to accidental oil spill and gas escape

Blowout and rupture of pipelines causing discharge and dispersal of oil are extremely rare events. However, in case of a blowout or rupture, wide reaching and severe impacts on the marine environment may occur (See Chapter 11).

When evaluating the potential socio-economic consequences of oil spills and gas escape, the following sectors can expect to be affected:

- The commercial fisheries, which consists of fishermen and businesses that are indirectly linked to the fishing industry. Two types of fisheries are relevant for the analysis: deep-sea fishery and coastal fishery. For the deep-sea fishery, spawning areas can be affected. For coastal fishery, shallow waters, fjords, bays and beaches can be affected during and following an oil spill.
- Fish farms along the coastal areas and interconnected businesses, which can be affected in the same manner as businesses, involved in coastal fishery.
- Tourism businesses along the coast, which can be affected by oil spills that reaches the shore or shallow waters.
- The personnel working on the platform is in risk of being injured or lose their life if gas and or oil escape occur in connection with a blowout if they are not evacuated in due time.

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In Chapter 11 – Environmental impacts of an oil release during a blowout incident – it is concluded that:

- an oil blowout at Hejre will not measurably affect the amount of fish eggs and larvae in the North Sea.
- the risk of oil stranding on coasts is negligible, the probability generally being < 1%. However, the probability along the Norwegian coast has been calculated at 1-5%.
- gas escape in connection with a blowout at Hejre might cause severe damages and mass mortality on zooplankton, benthic fauna and fish within the small, affected area. In the case personnel are not evacuated in due time, injuries or loss of lives of personnel may occur.
- the risk of oil spill or gas escape in connection with rupture of pipelines is minor as the system will close within a minute in case of pressure drop.

Thus, it can be concluded that it is unlikely that a potential oil spill or gas escape will affect the commercial fishery or the tourism sector.

13.4.4 Changes in employment

The oil and gas sector employed approximately 14,400 persons in Denmark in 2015 (Region Syddanmark, 2017). An analysis from 2012 (Quartz+co, 2012) found that out of 15,000 employed in the oil and gas sector approximately 1,700 employees were directly employed at the oil companies. This means that when one person is employed in the oil and gas sector, approximately 8 jobs are created in related industries.

The overall impact on employment from activities at the Hejre project is assessed to be positive.

13.4.5 Changes in tax revenue

The tax revenue from the Hejre tie-back to South Arne development project has not been quantified, but the tax revenue to the state of Denmark from oil and gas activities has historically been significant and include tax on hydrocarbon (52%) and corporate income tax (25%) (Danish Energy Agency).

State revenue from hydrocarbon production in the North Sea aggregated about 514 DKK billion in 2018 prices in the period 1972-2018. The total state revenue for 2018 has been calculated at 8,4 billion DKK (Danish Energy Agency, 2020). The overall impact on tax revenue from activities at the Hejre tie-back to South Arne development project is assessed to be positive.

13.5 Other consequences

Other consequences include potential impacts from noise, light, discharges and air emissions. As most of the activities take place more than 250 km from the coast, they will typically not affect neither the population along the coast nor the fishery industry in total.

13.5.1 Consequences of discharges

The clean-up and completion of wells can lead to

- Discharge of chemicals (chemicals from drilling mud, cementing, completion, rig utility and pressure testing)
- Discharge of treated sewage from the rig

None of the discharges are expected to result in persistent socio-economic effects.

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13.5.2 Consequences of underwater noise

Several of the construction activities in connection with the Hejre tie-back to South Arne will generate underwater noise.

It is assessed that the environmental risks related to underwater noise generated during construction, commissioning and decommissioning is negligible (ref. chapter 8.5). In line with this, it is expected that the activities will not result in persistent socio-economic effects.

13.5.3 Consequences of artificial light

The drilling rig will be illuminated during the dark hours and the flaring during will produce a horizontal flame, that causes substantial light emissions. In clear weather, this flame may be visual from up to 10 km from the platform and be stronger at night than during the day.

Due to the distance and the assessment of the environmental risk, it is assessed that the artificial light will not result in socio-economic impacts.

13.5.4 Consequences of atmospheric emissions

Air emissions are created during the construction and production phases, and can be traced to multiple sources, among which are:

- Emissions from energy production and compressors
- Emissions from transport activities
- Emissions from flaring
- Emissions from maintenance activities.

However, most of the emissions take place more than 250 km from the coast and will not affect neither the population along the coast nor the fishery industry in total.

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14. Cumulative effects assessment

Cumulative effects are the combined effects of projects or ongoing activities within a region.

Potential cumulative effects from the re-development of Hejre fall in two categories. Impacts from construction and operation of Hejre may interact with impacts from other oil and gas activities, and impacts from other activities such as wind farms, cable and pipeline installation and fishery and shipping in the region.

The assessment of potential cumulative effects from the re-development of Hejre is based on the strategic environmental assessment for the project area carried out in 2012 (Danish Energy Agency, 2012) and the technical report from DCE on the human uses, pressures and impacts in the eastern North Sea (Andersen et al., 2013) and information from DEA.

In addition to the above-mentioned references the DEA has appointed several areas for future wind farms (reservation of additional areas for national tendering of offshore wind farms according to the Energy agreement dated 29 June 2018. Reservation dated 28 August 2019). These areas are although closer to the coastal area about 100 km from the area with oil and gas installations, so no cumulative effects are expected, as the maximum impact range of the Hejre project is 5.5 km from the use of USBL/LBL.

EU has appointed a number of cross border infrastructure projects that links the energy systems of EU countries. The projects are typically oil or gas pipelines or cables. The list of these projects is published regularly on an EU homepage (<https://ec.europa.eu/energy/en/topics/infrastructure/projects-common-interest>). These types of projects can have some environmental impact as underwater noise, sediment spill and discharge of chemicals during construction, but no impacts are expected during normal operation.

For potential cumulative impacts from underwater noise, it is not a simple assessment as it is not possible to just add the various noise levels from different projects and multiply with an effect on receptor level.

Cumulative impacts may arise by a combination of different project activities and the underwater noise levels from these different activities, which should also take into account noisy activities from other projects, standby vessels and service vessels to the platforms in the area, fisheries, offshore wind (not relevant at Hejre), commercial shipping, military activities, scientific cruises etc. happening at the same time in the area. There are many human activities at sea that emit underwater noise. Getting all the relevant information temporally and spatially for these activities in advance for a specific area and period to make a factual assessment of cumulative impacts on receptor level, is not possible. It is not known where the fisheries will go, or how the commercial shipping will develop in numbers. It should be expected that appendix IV species in the North Sea are consecutively exposed to anthropogenic underwater noise that may be at levels that cause behavioural reactions.

The Mikaelson et al. 2025 study is a good example of this, showing that the predominant source of USBL signals in a pre-investigation area for an offshore windfarm investigated with geophysical surveys using USBL, was in fact USBL signals from trawlers. Trawlers use a sort of USBL system with several transponders using the same frequencies and source level as normal USBL systems. In the fishing industry it is called *catch control systems*, and they use it to monitor their trawls in a number of quantitative ways all through the year with no requirements for permissions or reporting. Trawlers are everywhere and they use catch control systems, and these sounds are a likely part of the everyday soundscape for marine mammals in the North Sea. Because of all the different moving noise sources and a lack of knowledge on the timing and physiological effects of each at the level of the individual receptor, it is not a simple task to accurately assess cumulative impacts from underwater noise, and the scientific community is working on models for how to accurately assess effects from individuals to populations from underwater noise. A more accurate cumulative impact assessment requires knowledge on the energetic effect of the individual sources on individual receptor level in the first place, knowledge that is only beginning to emerge. Models are being developed such as the PCoD (Population Consequences of Disturbance) and PCAD (Population Consequences Of Acoustic Disturbance

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Model) models, but they are not yet ready. Until such models are available, it must be assumed that the assessed project is not the only disturbance the animals encounter and that multiple exposures can negatively impact fitness if the animals are moved to areas where there is not enough prey to maintain their metabolism (Gallagher et al. 2021). So far, this does not seem to be the case for the North Sea, where the three assessed cetacean appendix IV species harbour porpoise, white-beaked dolphin and minke whale in the North Sea, all are assessed to be in favourable conservation status (DCE, 2021). Further, the assessed area is not a key habitat for these cetacean species, or for the European sturgeon.

It is in this project expected that underwater noise will be generated during the good weather window by for example ship activities and from platform modification in addition to short term activities e.g. from the pre-installation survey, and this is a very local effect of max 5.5 km. It is expected that it will be the noisiest activity in addition to the specific frequencies that will determine the distance from which the cetaceans may experience TTS and PTS or be deterred. This means that when a USBL or LBL is in use following mitigation, they determine behavioural impact of about 5.5 km for harbour porpoises, which is the most sensitive species, whereas when the pipeline is drenched down, it is more likely the vessel noise that determines behavioural impact of 400-1000 m, and when the rocks and matrasses are dumped, it is a behavioural impact range of 700-1200 m for harbour porpoises (Sveegaard et al. 2023). Each of these impacts takes place consecutively and except from commercial shipping (see Figure 6-25) and trawling, no other activities are expected to take place in the maximum impact range of 5.5 km. Even if both a commercial vessel and a trawler is present within this range, all cetaceans may swim in a direction without impact, or at least in a direction of decreasing sound pressure level. This will be the case for construction, production and decommissioning. Therefore the cumulative impacts of underwater noise on appendix IV species is assessed to be negligible as the impact is short-term (longest duration is during construction: 25 days), in a limited area and fully reversible.

Potential cumulative effects from Hejre have a low likelihood to occur during the production phase, with emission to air and as closest platform is around 25 km from Hejre, as mentioned earlier produced water is handled from the host (South Arne).

At the South Arne area, discharges of produced water are not likely to have potential cumulative effects as the distance to other platforms with similar discharges are too far to influence each other.

14.1 Cumulative effects with offshore energy related activities

Monitoring surveys have been carried out around Danish platforms in the North Sea for more than 19 years. Results from these surveys show that the impacts of a platform on the physical environment and biological communities reaches no further than 2 km from the platform. Hence, the installations at Harald and Trym do not impact the Hejre field during normal operation.

Other temporary impacts such as noise generation and chemical discharges during construction of installations and drilling of wells can possibly have an impact further away from the source. INEOS is not aware of any planned activities at Harald and Trym which has the potential to cause impacts at larger distances (more than 2 km from the platform) during the construction phase of the Hejre tie-back.

No drilling or other well-related activities will take place at South Arne during the time of construction the South Arne to Hejre tie-back, therefore no cumulative impacts at South Arne from the construction phase are foreseen.

Informed by Danish Energy Agency they are currently not evaluating any other applications for oil and gas installations or construction activities close to Hejre and/or South Arne, which can have cumulative effect on the Hejre project.

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Cumulative effects from different environmental impacts from the same platform has not been evaluated since there are no foreseen overlapping activities such as workovers or other maintenance activities at either Hejre or South Arne. In regard to emissions to air and discharges to sea the rig emissions will contribute to both in the period of construction but only temporarily and no cumulative effects is expected since the emissions does not significantly affect air quality and no discharges from rig will be found at 250-5000 meters from discharge point (the latter at a time frame of approx. 12 hours).

A mapping of cumulative human pressures and impacts has been carried out for the North Sea (Andersen et al. 2013). The study combines a number of human activities with ecosystem components and presents three indices describing the intensity of human use, the magnitude of the resulting pressures and the potential for cumulative human impacts. The impact index (potential for cumulative human impacts) is shown in Figure 14-1. As it appears from the figure, the Hejre platform and South Arne is situated in an area of low risk of causing an impact in combination with other activities. The area to the southeast of the Hejre field, where the number of platforms is high, has a higher risk of cumulative effects.

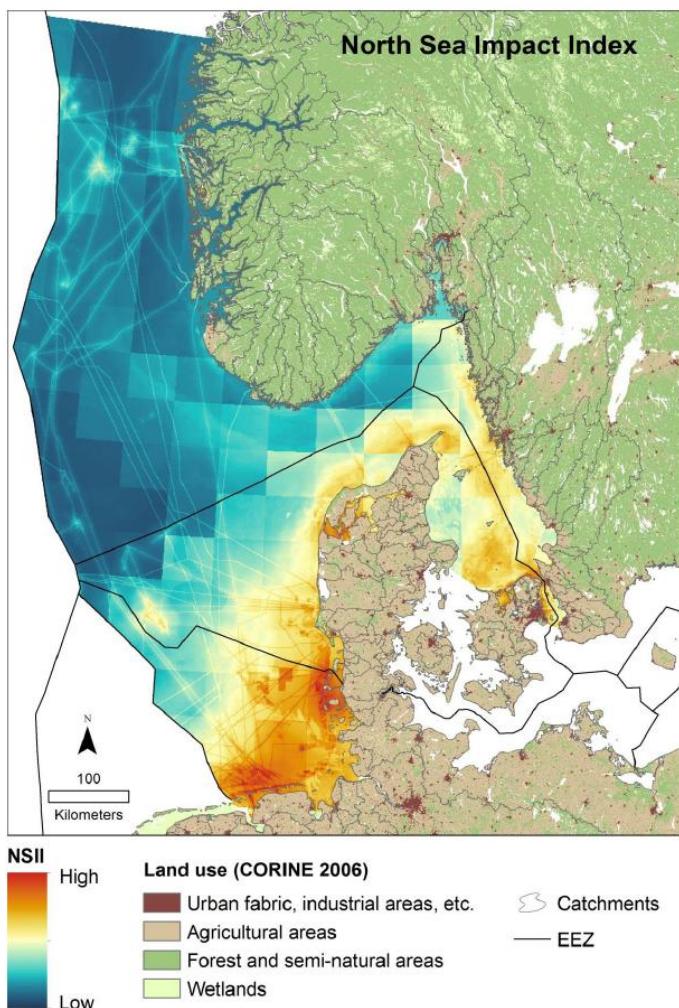


Figure 14-1 The North Sea Impact Index. From Andersen et al. (2013).

The DEA has prepared a map of the areas dedicated to windfarms as shown in Figure 14-2.

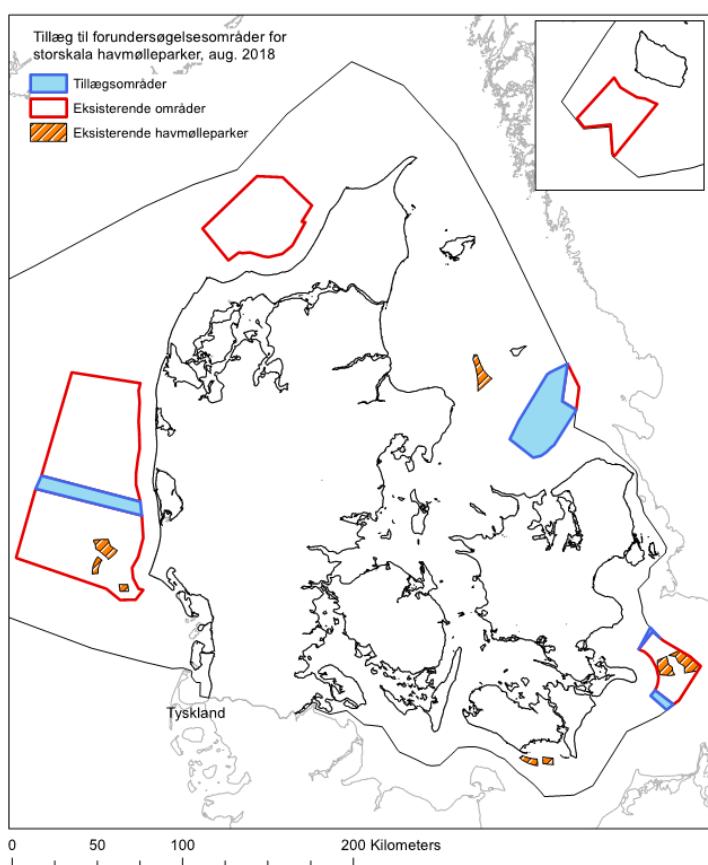


Figure 14-2 Areas appointed for wind farm projects

According to the present stage of development of the above-mentioned plans for wind farms it can be determined that cumulative effects will not appear, since the tendering of offshore wind farms in Denmark had to rerun. The two first plants, where of only one is in the North Sea (Nordsø Midt) have to be installed for minimum capacity in 2032. The location of Nordsø Midt, can be seen in Figure 14-3. The Hejre tie-back to South Arne is planned to be finalised in 2028 and there will therefore not be any cumulative effect.



Figure 14-3: Locations of three areas for wind farms in tender with deadline in 2026 and 2028.

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The timing of the re-development of Hejre will be earlier than the realisation of the energy island since this project has been postponed and as earliest will be realised in 2036.

In terms of designating areas for offshore energy project such as carbon capture and storage (CCS) and use of marine areas the marine spatial plan does not give any indications of any conflicting area planning in terms of the Hejre tie-back to South Arne development.

To sum up, due to the short impact range of maximum 5.5 km from underwater noise, and 2 km from activities affecting the sediment, and no other planned activities near Hejre or South Arne that reach these impact ranges, no cumulative impacts are expected during this project.

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15. Cross-border impacts

An ESPOO notification has been prepared for the Hejre tie-back to South Arne concept including:

- Information about the Hejre re-development project introducing the main concept: Hejre tie-back to South Arne
- Information about the EIA process for the Hejre re-development project
- Information about the potential transboundary impact, which has been identified and to be described further in the EIA
- Invitation for consultation according to article 3 in the ESPOO Convention

The impacts in Table 15-1 have been identified as potential transboundary impacts.

The neighbouring countries had in 2023 the possibility to comment to the topics to be included in the scoping of the environmental impact assessment regarding potential transboundary impacts and if relevant other topics that should be included in the environmental impact assessment.

The following impacts as shown in Table 15-1 can be seen as potentially transboundary and was therefore be elaborated in the ESPOO report.

Table 15-1 Potential transboundary impacts

| Potential transboundary impact | Receptor |
|--|---|
| Impacts of planned discharges to the sea during completion of wells and pressure testing of pipelines. | Fish eggs and larva, fish, plankton (pelagic organisms) |
| Impacts of planned discharges to the sea (produced water and production chemicals). | Fish, plankton (pelagic organisms) |
| Impacts of accidental spills and blowout events. | Fish, marine mammals, birds, ecosystems, tourism |
| Impact of air emissions during construction, production and de-commissioning phases. | Air quality and climate |

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16. Natura 2000 assessment

16.1 Potential impacts

The Hejre re-development project shall meet the requirements of a Natura 2000 assessment set by Consolidated Act No. 1098 of 21/08/2023 on identification and administration of international conservation areas and protection of species. It is noted that the project also complies with the Executive Order no. 846 of 26/06/2024 on offshore habitat assessment. This chapter thus makes up the Natura 2000 assessment.

The Natura 2000 assessment examines the likely effects of the Hejre re-development project alone and in combination with other projects upon Natura 2000 sites. The screening includes a description of the legal framework, the basis of the designations and an assessment of the likely environmental impacts of the Hejre re-development project on Natura 2000 sites by referring to previous chapters. The following potential impacts on Natura 2000 sites and Annex IV species have been summarised in this chapter:

- Impacts of a major oil spill during an uncontrolled blowout (a detailed assessment in Chapter 11)
- Impact of underwater noise (detailed assessment can be found in Sections 8.5, 9.7 and 10.6)

All species of cetaceans (whales, dolphins and porpoise) are listed in Annex IV in the Habitats Directive and are therefore strictly protected. A total of 23 different species of cetaceans has been observed in the North Sea, however only harbour porpoise (*Phocoena phocoena*), white-beaked dolphin (*Lagenorhynchus albirostris*) and minke whale (*Balaenoptera acutorostrata*) are encountered regularly in the western part of the Danish sector of the North Sea. The harbour porpoise is the most abundant species in the North Sea and occur regularly in the project area (Section 6.8.3).

16.2 Objective and procedures

According to the EU Habitats Directive 92/43/EEC of the Council of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora, projects are not allowed to significantly impact habitats or species that form the basis of a Natura 2000 designation. A Natura 2000 assessment aim to assess if the project alone or together with other plans and projects is likely to have significant effects on Natura 2000 sites. The screening is based on existing data.

If the Natura 2000 assessment shows that the project is likely to have a significant impact on a Natura 2000 site, an appropriate assessment must be conducted according to Article 6 of the Habitat Directive (Directive 92/43/EEC) implemented in Danish regulation as the Nature Protection Act (Consolidation act no. 927 of 28/06/2024). In the appropriate assessment it is assessed if the project will adversely affect the integrity of the site. This is evaluated by assessing the implications for the conservation objectives of the sites. If a significant effect cannot be excluded, alternative solutions must be assessed. In the absence of alternatives, compensatory measures must be assessed (Figure 16-1).



Figure 16-1 Stages of the Article 6 procedures in the assessment of a plan or a project potentially affecting a Natura 2000 site. The current stage of the Natura 2000 assessment of the Hejre re-development project is the screening phase.

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16.3 Identification of Natura 2000-areas and the existing conditions

The Hejre Development is situated far from Danish designated Natura 2000 areas (Figure 16-2). The closest Natura 2000 area is the German Special Area of Conservation (SAC) *Doggerbank* (DE 1003-301) which is located approximately 49 km from Hejre. As an extension of this area is the Dutch NL 2008-001 *Doggerbank* and the UK0030352 *Dogger Bank* in the UK sector. In the unlikely event of a major oil spill during a blowout, Danish Natura 2000 areas may potentially also be affected.

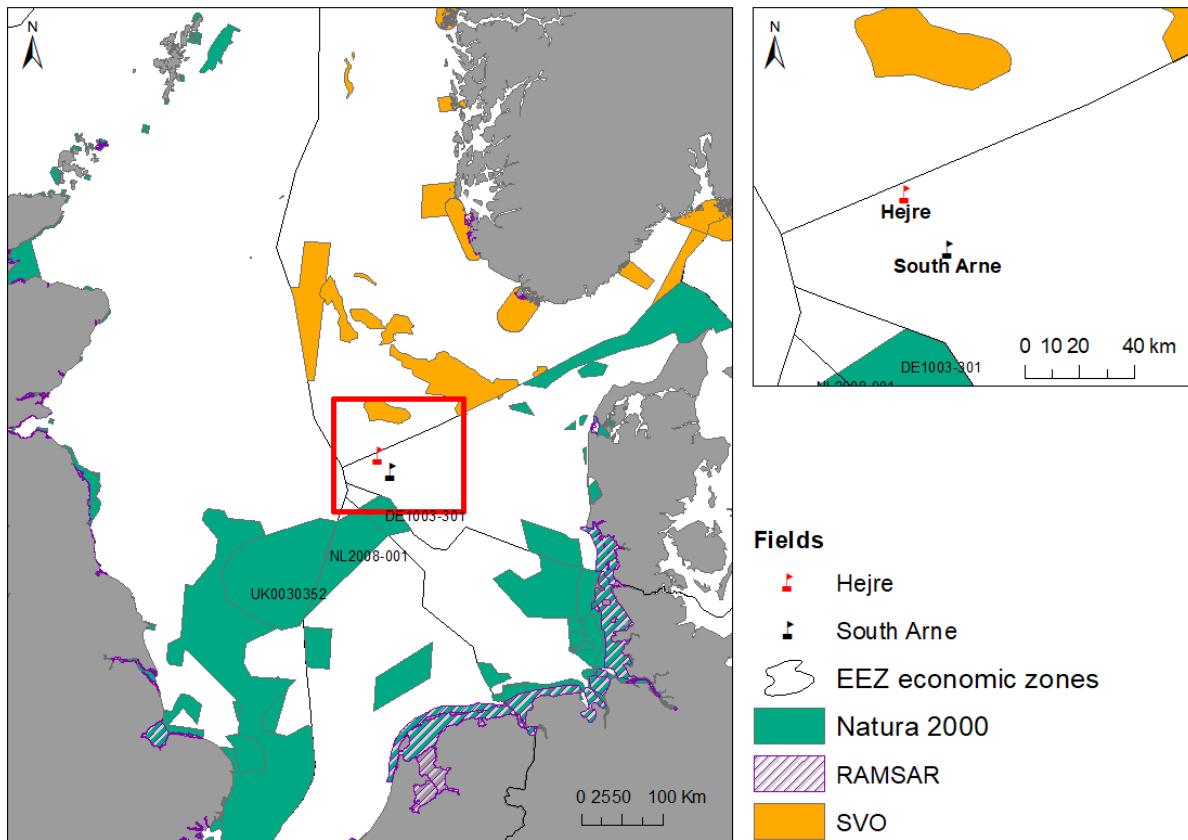


Figure 16-2 Location of natura 2000-areas (SACs) in the North Sea in addition to designated RAMSAR and SVO areas.

16.4 SAC DE 1003-301 Doggerbank

The German SAC DE 1003-301 Doggerbank is situated approximately 49 km south of Hejre Development. DE 1003-301 Doggerbank covers 1,624 km². and is situated on a receding flank of the Doggerbank (the tail end) with water depths increasing from 29 m to about 40 m.

16.4.1 Basis for designation

The basis for the designation of DE 1003-301 *Doggerbank* is according to <https://www.bfn.de/en/doggerbank-nca>:

- The Annex I habitat type 1110 *Sandbanks*, which are slightly covered by sea water all the time and habitat type *Species-rich gravel, coarse sand and shell layers*.
- The Annex II species 1351 *Harbour porpoise*, 1365 *Harbour seal*, 2032 *white beaked dolphin*, 2618 *minke whale*; 1364 *grey seal*.

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Official documents indicate that the overall conservation status of the Dogger Bank site is “unfavourable”, reflecting degraded ecological conditions (including altered species composition) mainly due to historical bottom-contact fishing impacts.

16.4.2 Status and conservation objectives Habitat type 1110 Sandbanks

More than 95% of the area of the SAC is sandbanks with mostly fine sands containing many shell fragments and is representative of the open offshore sublittoral zone (Bundesamt für Naturschutz 2008).

The sandbanks are without vegetation and are colonised by a community of benthic infauna that can be characterised as a *Bathyporeia*-*Fabulina* (Amphipod-*Tellina*) community, with the crustacean *Bathyporeia elegans* and the bristle worms *Spiophanes bombyx* and *Spio decorata* as characterising species. Other common species that may be encountered include the crustaceans *Bathyporeia nana*, *Scopelochirus hopei* and *Megaluropus agilis*, the bristle worms *Anaitides lineata* and *Sigalion mathildae* and the bivalves *Dosinia* sp. and *Gari fervensis* (Bundesamt für Naturschutz 2008).

Some 38 species on the German Red Lists have so far been recorded in the Doggerbank area. (Bundesamt für Naturschutz 2008).

16.4.3 Status and conservation objectives 1351 Harbour porpoise

The harbour porpoise is also described in chapter 6.8.3.

Harbour porpoise is the most abundant cetacean species in the North Sea. A clear seasonal pattern is apparent in the presence of harbour porpoises. A peak in numbers in coastal waters of the southern North Sea is reached between February and April and in late spring, a northward migration towards more offshore waters is observed (Haelters & Camphuysen 2010).

Harbour porpoises feed mostly on fish such as cod, whiting, mackerel, herring and sprat. They tend to be solitary foragers but do sometimes hunt in packs. The mating season is July-August. The gestation period typically lasts 10–11 months and most births occur in late spring and summer. Calves are weaned after 8–12 months.

Aerial surveys of the spatial distribution of marine mammals in the Doggerbank area was carried out in August-September 2013 and during summer 2011 (Geelhoed et al. 2014).

The surveys showed that the Doggerbank area constitutes an important habitat for harbour porpoises (*Phocoena phocoena*) in the North Sea. The 2013 survey resulted in an abundance estimate of ca. 45.000 individuals. This represents a substantial proportion of the abundance estimate for the North Sea and adjacent waters (i.e., ca. 12%).

The main aggregations were encountered outside the shallow parts of the Doggerbank. In 2011 and 2013 high densities of harbour porpoise was observed on the western/ south-western slope of the bank and the area between the bank and the UK coast. In 2011, high densities were also observed in the Danish sector north-east of the Doggerbank (Figure 16-3).

The harbour porpoise has most recently been assessed for *The IUCN Red List of Threatened Species* in 2020. *Harbour porpoise* is listed as Least Concern (Braulik, Minton, Amano, & Bjørge, 2023).

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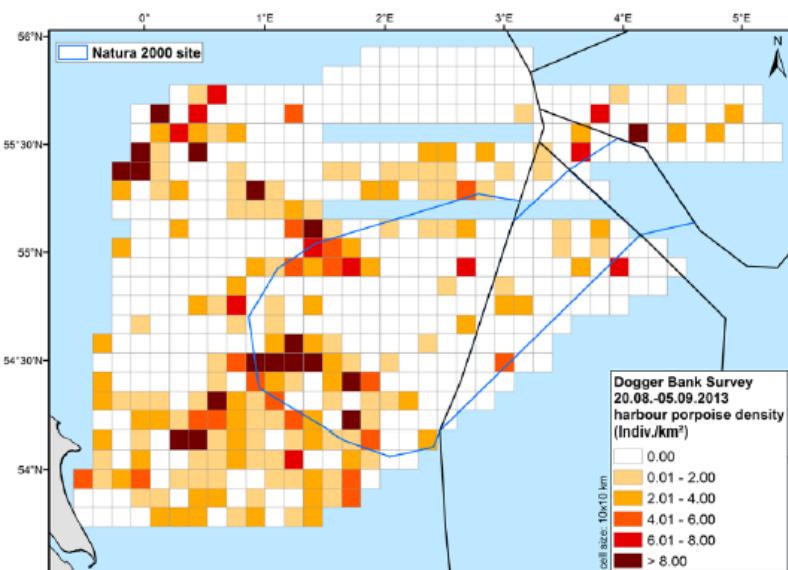
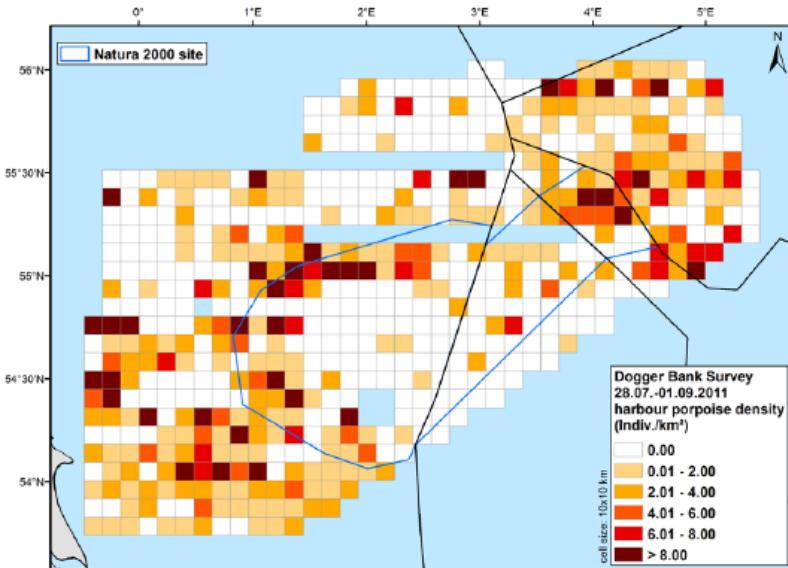


Figure 16-3 Spatial distribution of harbour porpoise density (number/km²) in the Doggerbank area during 2011 (top) and 2013 (bottom. From Geelhoed et al. 2014).

16.4.4 Status and conservation objectives 2032 White-beaked dolphin

White beaked dolphin (*Lagenorhynchus albirostris*) is relatively common in the northern part of the North Sea and may be encountered at Dogger Bank (Geelhoed et al 2014, Hammond et al 2013, Reid, et al. 2003). White beaked dolphin is much less abundant than harbour porpoises. The total population in the North Sea is only about 16,500 individuals (Hammond et al. 2013).

White-beaked dolphins are acrobatic and social animals that are typically found in pods of 4-6 animals. They will frequently ride on the bow wave of fast-moving vessels and jump clear of the water surface. White beaked dolphin mates from May to August and the delivery occur the following summer after a gestation period of about 11 months. They primarily feed on fish such as herring, cod, haddock, whiting and hake but may also prey on squid, octopus and benthic crustaceans.

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White-beaked Dolphin *Lagenorhynchus albirostris* has most recently been assessed for *The IUCN Red List of Threatened Species* in 2018. *Lagenorhynchus albirostris* is listed as Least Concern (Kiszka & Braulik, 2018).

16.4.5 Status and conservation objectives 2618 Minke whales

Minke whale (*Balaenoptera acutorostrata*) may be observed at the Dogger Bank (Geelhoed et al. 2014, Hammond et al. 2013, Kinze 2007, Reid et al. 2003). The minke whale is the only species of baleen whale that occurs regularly in the North Sea. The population in the North Sea has been estimated to about 19.000 individuals (Hammond et al. 2013).

Mating and delivery take place from late winter to early spring. The female gives birth to a calf every year or every second year. The gestation period is 10 months, and nursing of the calf takes place for 3-6 months. Minke whales primarily feed on pelagic fish such as herring and sprat and small crustaceans.

Common Minke Whale *Balaenoptera acutorostrata* has most recently been assessed for *The IUCN Red List of Threatened Species* in 2018. *Balaenoptera acutorostrata* is listed as Least Concern (Cooke, 2018).

16.4.6 Status and conservation objectives 1365 Harbour seal

Harbour seal (*Phoca vitulina*) is the only species of seal that has been observed regularly in the central part of the North Sea. Harbour seals are primarily coastal, depending on isolated and undisturbed land areas for resting, breeding and moulting (such as undisturbed islands, islets sandy beaches, reefs, skerries and sand-banks). They are gregarious animals and when not actively feeding, they will haul onto a terrestrial resting site. The harbour seal does not generally venture more than 20 kilometres offshore. However, radio-tagging experiments using satellite tracing have indicated that harbour seals may undertake foraging migrations far out into the North Sea from their core areas along the coast (Tougaard et al. 2003, Tougaard 2007). They are known to prey primarily on fish such as herring, mackerel, cod, whiting and flatfish, and occasionally upon shrimp, crabs, molluscs and squid. Females give birth once a year, with a gestation period of approximately nine months. Harbour seal breed in large numbers in the Wadden Sea. It is less common along the British coast.

Harbour Seal *Phoca vitulina* has most recently been assessed for *The IUCN Red List of Threatened Species* in 2016. *Phoca vitulina* is listed as Least Concern (Lowry, 2016).

16.4.7 Status and conservation objectives 1354 Grey seal

The grey seal (*Halichoerus grypus*) breeds in several colonies on islands on the east coasts of Great Britain. Notably large colonies are at Donna Nook (Lincolnshire), the Farne Islands off the Northumberland Coast Orkney and North Rona off the north coast of Scotland. In the German Bight, colonies exist off the islands Sylt and Amrum and on Helgoland. In Denmark, Germany and Holland Wadden Sea grey seal haul out and breed on inaccessible islands. The pups are born in the period November- January. Within a month or so, they shed the lanugo fur and grow the dense waterproof adult fur and soon leave for the sea to learn to forage for themselves. Tagging experiments have indicated that grey seals breeding in Great Britain migrate long distances into the North Sea from their breeding colonies (McConnell et al. 1999). A recent tagging study from Denmark showed that grey seal travel from tagging sites on the Danish West coast and Helgo land to all across the North Sea, also to the oil and gas sectors (Kyhn, et al., 2024b). The grey seal feeds on a wide variety of fish including sand eels, cod and other gadoids, flatfish, herring and skates. They may also take octopus and lobster.

Grey Seal was most recently assessed for *The IUCN Red List of Threatened Species* in 2016. *Halichoerus grypus* is listed as Least Concern.

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16.5 SAC NL 2008-001 Doggerbank

16.5.1 Basis for Designation

The basis for the designation of NL 2008-001 *Doggerbank* is:

- The Annex I habitat type 1110 *Sandbanks*, which are slightly covered by sea water all the time and
- The Annex II species 1351 *Harbour porpoise*, 1365 *Harbour seal* and 1364 *Grey seal*

There is currently no basis analysis and management plan for the SAC NL 2008-001 Doggerbank. The general conservation objective is to protect habitat types and species that are the basis for the designation.

16.5.2 Status of and conservation objectives of Habitat type 1110 *Sandbanks*

The habitat type covers approximately 4.700 km² which is almost all the designated Natura 2000 area. The area is shallow with water depth in the range 24-40 m. There is limited literature about the Dutch part of the Doggerbank, but its major characteristics is assumed to be comparable to the UK section of the bank. I.e., it is composed of fine sand with no vegetation.

16.5.3 Status and conservation objectives 1351 *Harbour porpoise*

The status of harbour porpoise (*Phocoena phocoena*) in the central North Sea is described in section 16.4.3 above. The total number of harbour porpoises on the Dutch Continental Shelf has been estimated at 46,580 individuals (Geelhoed 2017) (Figure 16-4). The highest abundance was observed offshore, while the Dogger Bank was a less important habitat accounting less than 3 % of the total population in Dutch North Sea.

It has not been possible to find specific information on conservation objectives for harbour porpoise in NL 2008-001 *Doggerbank*.

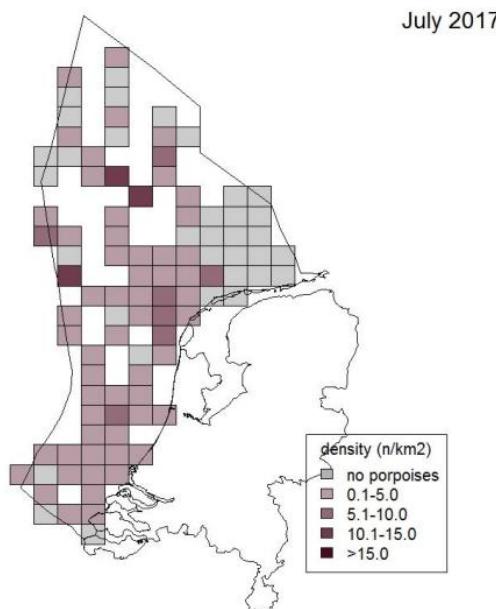


Figure 16-4 Density of Harbour porpoises in the Dutch North Sea. From Geelhoed et al. 2017.

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16.5.4 Status and conservation objectives 1365 Harbour seal

There are no specific data on the status of harbour seal (*Phoca vitulina*) in NL 2008-001 Doggerbank. However, aerial surveys were conducted in 2017 in the Dutch part of the North Sea where there were a few sightings. It is however assumed that they migrate to the area from the Wadden Sea to forage. The harbour seal population in the Dutch part of the North Sea is estimated to 6000 individuals (Nordseelocket). Of these most occur in the Wadden Sea.

16.5.5 Status and conservation objectives 1364 Grey seal

The Dutch North Sea zone is an important area for grey seal in terms of foraging and migration. Seals spend most of their time near their breeding colonies (haul outs), but the grey seal may also migrate long distances to forage. Seals foraging at the Doggerbank are reported to belong to hauls from the Frisian Front and the Wadden Sea but may as well originate from the UK (Brasseur et al. 2010). The grey seal feeds on a wide variety of fish including sand eels, cod and other gadoids, flatfish, herring and skates. They may also take octopus and lobster.

16.6 SAC UK0030352 Doggerbank

16.6.1 Basis for Designation

The basis for the designation of UK0030352 *Doggerbank* is:

- The Annex I habitat type 1110 *Sandbanks* which are slightly covered by sea water all the time and
- The Annex II species 1351 *Harbour porpoise*, 1365 *Harbour seal* and 1364 *Grey seal*

16.6.2 Status and conservation objectives Habitat type 1110 Sandbanks

The habitat type 1100 Sandbanks covers almost the entire UK Doggerbank. Large parts of the sandbanks are in the southern part covered by less than 20 m water. The bank is without vegetation and is moderately mobile with clean sandy sediments. The fauna of the banks is impacted by bottom trawling which has reduced the number of long lived or fragile organisms. The fauna is therefore dominated by robust short-lived invertebrates including polychaetes such as *Nephthys cirrosa*. The major parts of the bank are intact. Sand eels are an important prey resource found at the bank supporting a variety of species including fish, seabirds and cetacean (JNCC, 2017).

16.6.3 Status and conservation objectives 1351 Harbour porpoise

The Doggerbank is a core area for harbour porpoises, and the population is well documented. In 2013 the Harbour porpoise population at Doggerbank was investigated by aerial surveys. The total population was estimated to 45,000 individuals. Of these more than half were observed on the slope of the bank in the UK sector of the Doggerbank (Geelhoed et al. 2014). In the shallow part of the banks, the density of harbour porpoises is generally lower.

16.6.4 Status and conservation objectives 1365 Harbour seal

Harbour seal (*Phoca vitulina*) is known to visit the Doggerbank (Geelhoed et al. 2014). There are no specific data on the population occurring on Doggerbank, but it is a common foraging visitor.

16.6.5 Status and conservation objectives 1364 Grey seal

The grey seal (*Halichoerus grypus*) breeds in several colonies on islands on the east coasts of Great Britain. Tagging experiments have indicated that grey seals breeding in Great Britain migrate long distances into the North Sea from their breeding colonies (McConnell et al. 1999) and migrate to the Doggerbank to

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forage. The grey seal feeds on a wide variety of fish including sand eels, cod and other gadoids, flatfish, herring and skates. They may also take octopus and lobster.

16.7 Potential impacts

The potential effects from construction, production and decommissioning of the Hejre field for this EIA have been assessed as a part of the environmental impact assessment in chapter 8 to chapter 11. The results of these assessments have been used as basis for the Natura 2000 preliminary appropriate assessment (Natura 2000 assessment) of the Hejre re-development project.

The following potential impacts on Natura 2000 sites and Annex IV species have been assessed:

- Impacts of a major oil spill during an uncontrolled blowout
- Impacts of underwater noise

16.7.1 Impacts of oil spill during blowout

A blowout is the uncontrolled release of crude oil and/or natural gas from a well after pressure control systems have failed. The probability of a blowout occurring is very low but in case a blowout occurs, wide reaching and severe impacts on the marine environment may occur.

Impacts of a blowout at Hejre on Natura 2000 habitats and species have been assessed in Chapter 11. The assessment is based on modelling, using the OSCAR statistical oil drift model and known effects of oil on the habitats, and species that form the basis for the designating of the Natura 2000-areas.

The assessment concludes that risks of deleterious impacts of a blowout at Hejre on Natura 2000 areas and Annex IV species will be negligible because the probability that a blowout will occur is extremely small. In the unlikely event of a blowout and in a case where oil spill combat is not carried out, impacts on the conservation status of 1351 *Harbour porpoise*, 1365 *Harbour seal* and 1365 *Grey seal* as well as the conservation status and integrity of 1110 *Sandbanks* in the nearest Natura 2000 areas (German and Dutch Natura 2000 areas south of Hejre) is assessed to be limited: Harbour porpoises, harbour seals and grey seals may be affected by oil, but it is assessed that only a tiny fraction of the populations the three species in the North Sea is likely to be affected. It is therefore not likely that a potential oil contamination from a blowout will significantly affect the population sizes of the three species.

There may be a very small risk of sedimentation of oil on the habitat type 1110 *Sandbanks*, especially in the German area, thereby affecting the benthic infauna community. It is assessed that the effect is negligible.

The risk of deleterious impacts on marine species and habitats, which form the basis for designating the Danish Natura 2000-sites, is negligible.

In case of an uncontrolled blowout or other types of spills the INEOS' oil spill contingency plan will be activated, which will reduce the spreading of oil and mitigate impacts of the spill.

16.7.2 Impacts of underwater noise

Underwater noise for the Hejre Development – Tie-back to South Arne is generated during:

- Construction phase (section 8.5): Noise from the rigs, installation of a new topside at Hejre, due to modifications to both Hejre and South Arne and pipe laying using USBL and LBL (including ROV based

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pre- and post-installation survey using USBL). In addition, noise from machinery, propellers and thrusters of ships during the completion, modifications and installation operations.

- Operation (section 9.7): It is expected that Hejre will be subject to underwater inspection and possible maintenance requiring ROV or the like and use of USBL to track position of the ROV.
- Decommissioning phase (section 10.6): Noise from vessels and cuttings of underwater structures.

Underwater noise has the potential to impact designated species as basis for designation of the Natura 2000 area, including Annex IV species. However, underwater noise caused by the Hejre Development project do not have the potential to impact habitat types as the basis for designation of the Natura 2000-area.

Impacts from underwater noise during the construction phase has been assessed to be negligible (section 8.5). The primary noise source and concern is the use of USBL during first the pre-installation survey of the pipeline route, then cable laying and last the post survey of the pipeline route. Since USBL can cause permanent hearing impairment, its use will be mitigated in this project to fully reduce the risk of hearing impairment. The mitigation is described in chapter 0. Potential impacts are therefore only on behaviour of marine mammals, and these are assessed to be short term and fully reversible with hours. All vessel-based activities are in themselves expected to cause avoidance reactions for harbour porpoises within some 400-1000 m. Activities using USBL will cause deterrence within some 5.5 km range around the vessel as it moves along (Mikaelson et al. 2025). With the planned use of mitigation for each use of USBL or LBL, it is not expected that the project activities at Hejre and South Arne will exceed the sound exposure levels that are harmful to cetaceans and seals (section 8.5).

Impacts of underwater noise during production have been assessed to be negligible (section 9.7). The primary noise sources will be as for the construction phase from vessels and use of USBL and LBL. Use of USBL and LBL will be fully mitigated to effectively reduce the risk of PTS and TTS.

Impacts from underwater noise during the decommissioning phase has been assessed to be negligible (section 10.6). Noisy activities during decommissioning include broad band noise from heavy lift vessels and service vessels, which may cause harbour porpoises to react to the noise, however underwater noise from vessels is not expected to exceed the threshold for hearing damage. In addition to the noise from vessels there will potentially be underwater noise from diamond wire cuttings, although this is not expected to lead to hearing damage of marine mammals (section 10.5). If USBL or similar will be used, mitigation will be in place at start-up.

Based on the above considerations and assessments, underwater noise from the Hejre re-development will have insignificant impact on the conservation objectives of the habitat types and species in the Natura 2000 sites.

It is expected that the noise from vessels and cutting works potentially will scare cetaceans (Annex IV species) to safe distances from the working field. If noise work occurs that may cause PTS or TTS, mitigation will be employed to fully reduce this risk.

16.8 Conclusion

It is concluded that the Hejre tie-back to South Arne will not negatively affect the conservation status of habitats and species, for which potentially affected Natura 2000-sites have been designated as well as species listed on Annex IV of the EU Habitats directive (Directive 92/43 EEC of 21 May 1992). Nor will the re-development affect the integrity of the areas negatively.

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Based on the environmental impact assessment in chapter 8 to chapter 10 and using the criteria described in Chapter 7, it is assessed that the environmental risks related to physical disturbance of seabed, sediment disposal, presence of pipelines, discharge of produced water and chemicals, emissions to air, waste and artificial light is negligible or low. Since the nearest Natura 2000 area is 49 km away and since there is not documented negative impact on cetaceans (Annex IV species) from these operations in the nearest Natura 2000 site, the abovementioned operations are not considered to potentially affect Natura 2000 sites or Annex IV species.

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17. Danish Marine Strategy II

The EU Marine Strategy Framework Directive (MSFD) is put in place to protect the marine ecosystem and biodiversity upon which the health and marine-related economic and social activities depend.

To help EU countries achieve a good environmental status (GES), the directive sets out 11 illustrative qualitative descriptors. The descriptors D1, D4 and D6 are related to the existing conditions of the marine environment while descriptor D2, D3, D5-D11 are related to the impact on the marine environment from human activities.

According to the Danish Marine Strategy II (Ministry of Environment and Food 2019), which implement the MSFD, the most important impacts in the North Sea/Skagerrak are caused by these aspects: nutrients, non-indigenous species, fisheries, noise, contaminants, marine litter (micro plastic in sediment), shipping and physical modifications (Danish Marine Strategy II figure 19.6). Not all these aspects are relevant for the general oil and gas production activities. The most relevant and important descriptors for oil and gas production activities in general are D8 Contaminants, specifically for acute pollution events, and D11 Underwater noise (Ministry of Environment and Food 2019).

The EU Commission has defined criteria and methodological standards on good environmental status of marine waters (GES Commission Decision (EU) 2017/848 of 17 May 2017). The Ministry of Environment and Food has defined environmental targets for each descriptor, based on the criteria defined in the GES Decision. According to the Marine Strategy Act (Consolidation act no. 123 of 01/02/2024, (§18), the Danish authorities may not issue approvals etc. which are in conflict with these environmental targets in addition to the programme of measures.

17.1 Potential impacts

The activities during construction, production and decommissioning may potentially affect the Marine Strategy Framework Directive's (MSFD) 11 descriptors for Good Environmental Status (GES). The project activities that may potentially affect GES are listed below (Table 17-1).

Table 17-1 Activities potentially affecting the MSFD's 11 descriptors of Good Environmental Status (GES).

| Project phase | Activity |
|------------------|---|
| Construction | Vessel noise, noise from rig and installation of topside and pipelaying including pre- and post-installation ROV survey of pipeline route Artificial light Physical disturbance and damage of the seabed Spreading of sediment during pipelaying Planned discharge of chemicals and treated sewage Accidental spill and blow-out events Spreading of non-indigenous species through ballast water and marine fouling on vessels |
| Production phase | Establishment of fisheries exclusion zones and safety zones Discharge of produced water Discharge of production chemicals Accidental spill and blow-out events Spreading of non-indigenous species through ballast water and marine fouling on vessels Underwater noise |

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|-----------------|--|
| Decommissioning | Vessel noise, noise from rig and removal of installation, incl. underwater noise Artificial light during decommissioning Planned discharge of chemicals Waste during decommissioning Air emissions |
|-----------------|--|

In the following sections the potential impacts are compared with the environmental targets from the Danish Marine Strategy II.

17.1.1 Descriptor 1 – Biodiversity

The environmental targets for descriptor 1 from the Danish Marine Strategy II for Biodiversity, including birds, marine mammals and fish are shown in Table 17-2. It is also stated if the descriptor is impacted by the Hejre tie-back to South Arne Development project.

Description of the status of birds, marine mammals and fish in the project area are described in Sections 6.6, 0 and 6.8. The environmental targets for descriptor 1 are described in Table 17-2.

Table 17-2 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 1 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--------------|--|---|--|
| Birds | 1.1 Incidental by-catch of birds is at a level that does not threaten the species in the long term | Not applicable | The project does not engage in incidental by-catch of birds. |
| | 1.2 Populations and habitats for birds are conserved and protected in accordance with objectives under the Birds Directive | Potential impacts include noise and light disturbances in addition to unplanned discharges/accidental spills during the construction, production and decommissioning phase. Potential impacts cause by noise and light disturbances are assessed to be either negligible or no impacts are expected (Section 8.6, 9.8 and 10.5). Accidental spills are assessed in Chapter 11. | Birds and the existing conditions are described in Section 6.7. The project area is not considered as important for seabirds and is not located within a bird protected area. Mitigating measures described in Section 19.6. |
| | 1.3 The Ministry of Environment and Food contributes to regional work regarding establishment of threshold values and determination of good environmental status and works to ensure that the status for biological diversity is in accordance hereto. | Not applicable | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 1.4 More knowledge about by-catch of seabirds is collected pursuant to the relevant monitoring programmes. | Not applicable | The project does not engage in incidental by-catch of birds and is not engaged in monitoring of the same. |

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|-----------------------|---|--|--|
| | 1.5 Need for protection initiatives for HELCOM and OSPAR Red List species is assessed. If there are any Red List species that are endangered or not sufficiently protected, the Ministry of Environment and Food will assess specifically the need for further initiatives in collaboration with relevant ministries. | Not applicable | The oil and gas industry is not involved in the assessment of whether Red List species are sufficiently protected. |
| Marine mammals | 1.6 Incidental by-catch of harbour porpoise is reduced as much as possible, and as a minimum to a level below 1.7% of the total population | Not applicable | The project is not engaged in activities that might cause incidental by-catch of harbour porpoises. |
| | 1.7 Incidental by-catch of seals is at an adequately low level that does not threaten populations in the long term. | Not applicable | The project is not engaged in activities that might cause incidental by-catch of seals. |
| | 1.8 Harbour porpoise, harbour seal and grey seal achieve favourable conservation status in accordance with the timeline laid down in the Habitats Directive. | Potential impacts include underwater noise during the construction phase and unplanned discharges/accidental spills. Potential impacts from underwater noise are assessed to be negligible (Section 8.5). Accidental spills are assessed in Chapter 11. | Mitigating measures described in Section 19.6. |
| | 1.9 The Ministry of Environment and Food contributes to setting population-specific threshold values for by-catches of harbour porpoise in a regional context with a view to subsequently setting environmental targets for vulnerable populations of harbour porpoise. | Not applicable | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 1.10 More knowledge about by-catches of marine mammals is collected pursuant to the relevant monitoring programmes. | Not applicable | The oil and gas industry is not involved in by-catches of marine mammals or relevant monitoring of the same. |
| Fish | 1.11 The Ministry of Environment and Food carries out an analysis of by-catches of shark and ray in Danish marine areas, and the possibility of a DNA-based approach to determining species is investigated. | Not applicable | The oil and gas industry is not involved in this work. |
| | 1.12 The Ministry of Environment and Food establishes a national indicator to evaluate the status of Danish fish that are not exploited commercially, and the opportunities to further develop regional indicators are investigated. | Not applicable | The oil and gas industry is not involved in this work. |

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| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|-------------------------|--|---|---|
| | 1.3 The Ministry of Environment and Food contributes to regional work regarding establishment of threshold values and determination of good environmental status, and works to ensure that the status for biological diversity is in accordance hereto | Not applicable | The oil and gas industry is not involved in this work. |
| Pelagic habitats | 1.13 Occurrence of plankton follows the long-term average. | Potential impacts on plankton include planned discharges to the sea during the production phase and unplanned discharges/accidental spills. Potential impact on plankton from planned discharges are assessed to be negligible (Section 9.4). Accidental spills are assessed in Chapter 11. | The primary production of plankton is generally higher in the coastal regions compared to offshore areas. The general conditions of plankton in the project area are described in section 6.5. Mitigating measures described in Section 19.6. |
| | 1.3 The Ministry of Environment and Food contributes to regional work regarding establishment of threshold values and determination of good environmental status, and works to ensure that the status for biological diversity is in accordance hereto | Not applicable | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 1.14 The Ministry of Environment and Food is tracking developments and improving the knowledge base about plankton through monitoring. | Not applicable | The oil and gas industry is not involved in this work. |

17.1.2 Descriptor 2 – Non-indigenous species (NIS)

The environmental targets for descriptor 2 are described in Table 17-3. Distribution of non-indigenous species (NIS) related to oil and gas installations are described in OGD's report from February 2017 "Descriptor-based review of 25 years of seabed monitoring data collected around Danish offshore oil and gas platforms" and included in the monitoring report from South Arne, see section 6.4. The environmental targets for descriptor 2 are described in Table 17-3.

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Table 17-3 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 2 according to the Danish Marine Strategy II.

| | Goals | Impact from the Hejre tie-back to South Arne Development project | Comments |
|------------|--|--|---|
| NIS | 2.1 The number of new non-indigenous species introduced through ballast water, ship fouling and other relevant human activities is decreasing | <p>Two species identified as non-indigenous species in the South Arne area.</p> <p>The rare occurrence and low abundance reported is not indicative of a well-established population considering that the four benthic non-indigenous species observed in the areas with oil and gas installations have been present in the North Sea coastal areas for several decades.</p> <p>Potential impacts from non-indigenous species are described in section 12. The environmental risk is assessed to be low.</p> | <p>Non-indigenous species are described in section 6.4.</p> <p>Mitigation measures described in section 19.8.</p> |
| | 2.2 The distribution of certain invasive species is, as far as possible, at a level so that significant adverse effects are stable or decreasing. | Platforms may be used as stepping-stones during a secondary dispersal of non-indigenous species. However, as the structures at Hejre and South Arne are already present, there is no additional risk to be evaluated for this EIA. | <p>Non-indigenous species are described in section 6.4.</p> <p>Mitigation measures described in section 19.7.</p> |
| | 2.3 The Ministry of Environment and Food contributes to regional work regarding establishment of threshold values and determination of good environmental status, and works to ensure that the number of new non-indigenous species and impacts from invasive species are in accordance hereto | Not applicable | <p>The oil and gas industry is not involved in the work with establishment of threshold values.</p> |

17.1.3 Descriptor 3 – Commercially exploited fish stocks

The commercially exploited fish in the area are described in section 6.6. Most of the commercially exploited North Sea stocks of the typical fish species encountered in the project area are in good condition and are fished at a sustainable level. However, the cod stock in the North Sea is in a poor condition. The area around Hejre and South Arne are although not considered as a core area for cod. The environmental targets for descriptor 3 are described in Table 17-4.

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Table 17-4 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 3 according to Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|---|--|---|
| Commercially exploited fish stock | 3.1 The number of commercially exploited fished stocks regulated pursuant to the MSY principles in the Common Fisheries Policy is increasing. | Not applicable | Descriptions of fish in the project area is described in section 8.10. Commercially exploited fish stocks are described in 8.10.3. |
| | 3.2 Within the framework of the Common Fisheries Policy, fish mortality (F) is at levels that can ensure a maximum sustainable yield (F _{msy}). | Potential impacts on fish include spreading of sediment from pipelaying, underwater noise during the construction, production and decommissioning phases and planned discharges/accidental spills. The impacts from spreading of sediment (section 8.3.1) and underwater noise (section 8.5, 9.7, 10.6) are both assessed to be negligible. Potential impact on fish from planned discharges are assessed to be negligible (Section 9.4). Accidental spills are assessed in Chapter 11. | Mitigating measures described in Section 19.6. |
| | 3.3 Within the framework of the Common Fisheries Policy, spawning biomass (B) exceeds the level that can ensure a maximum sustainable yield (MSY B _{trigger}) | See 3.2 | |

17.1.4 Descriptor 4 – Food webs

Marine food webs can potentially be affected by physical disturbance of the seabed, underwater noise, artificial light, planned discharge of chemicals and unplanned oil spill (blowout). The environmental targets for descriptor 4 are described in Table 17-5.

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Table 17-5 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 4 according to Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|------------------|---|--|---|
| Food webs | 4.1 The Ministry of Environment and Food contributes to regional work regarding establishment of threshold values and determination of good environmental status and works to ensure that the anthropogenic impacts on the food web are in accordance hereto. | Not applicable | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 4.2 The Ministry of Environment and Food contributes to regional knowledge and methodology development on marine food webs. | Not applicable | The seabed monitoring programme conducted around the oil and gas installations conducted every 3 years gives input to the knowledge of the benthic fauna. |
| | 4.3 The Ministry of Environment and Food is tracking the development in the food web through monitoring the individual sub-elements of the web | Not applicable | The seabed monitoring programme conducted around the oil and gas installations conducted every 3 years gives input to the knowledge of the benthic fauna. |

17.1.5 Descriptor 5 – Eutrophication

As described in the Danish Marine Strategy II, section 12 the loads related to eutrophication is mainly due to discharge from land-based activities. The environmental targets for descriptor 5 are described in Table 17-6.

Table 17-6 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 5 according to the MSDF II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|-----------------------|---|--|--|
| Eutrophication | 5.1 The Ministry of Environment and Food contributes to regional work regarding establishment of threshold values and determination of good environmental status for the North Sea, including the Skagerrak, and works to ensure that anthropogenic eutrophication and its effects are in accordance hereto | Not applicable | The project has no impact on the eutrophication. The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 5.2 Danish inputs of nitrogen and phosphorus (TN, TP) comply with the maximum acceptable inputs stipulated under HELCOM. | Not applicable | The project has no impact on the eutrophication. |

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| | 5.3 Coastal waters: Target loads and needs for measures for fjords, estuaries and coastal waters determined in accordance with the Water Framework Directive are complied with. Targets and needs are described in the Danish river basin management plans | Not applicable | The project has no impact on the eutrophication. The project is not located in coastal waters. |
|--|--|----------------|--|

17.1.6 Descriptor 6 – Sea Floor Integrity

The physical disturbance of the seafloor from oil and gas installation is limited as described in Table 13-3 in the Danish Marine Strategy II. The only impact from the Hejre tie-back to South Arne Development project on the seafloor will be during the pipelaying in addition to the rig activities for the well perforation and clean-up activities. It is acknowledged, that according to the Danish marine Strategy II Table 13.2 oil- and gas installations (platforms and pipelines) are viewed as physical loss of the seabed, however, as the pipeline between Hejre and South Arne is expected to be trenched and subsequently backfilled and the before mentioned rig is only temporary, this is viewed as physical disturbance of the seabed. The impact will thus be temporary. The environmental targets for descriptor 6 are described in Table 17-7.

Table 17-7 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 6 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|------------------------------------|--|--|---|
| Losses and physical impacts | 6.1 Ministry of Environment and Food contributes to work regionally and in the EU regarding establishment of threshold values and determination of good environmental status, and works to ensure that losses, physical disturbance and adverse effects on the sea floor are in accordance hereto. | Not applicable | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 6.2 The knowledge base about the Danish sea floor, as well as the abundance and the location of the benthic habitats and their status, is improved pursuant to the monitoring programme (NOVANA) | Not applicable | The oil and gas industry is not involved in the NOVANA monitoring programme. The project activities will not impact NOVANA monitoring stations. |
| | 6.3 Through regional work and the work in the EU, better understanding of the impacts on the seafloor in relation to losses, disturbances and adverse effects is achieved. | Not applicable | The oil and gas industry is not involved in the regional work. |
| | 6.4 In connection with licensing off-shore activities requiring an environmental impact assessment (EIA), the approval authority encourages assessment and reporting to the Danish Environmental Protection Agency (monitoring programme) of the extent of physical losses and physical disturbances of benthic broad habitat types. | The potential temporary impacts on the seabed integrity caused by the pipeline laying and the rig activities for well perforation and clean-up activities are assessed to be negligible (chapter 8). | If required, the project will report the calculated area for physical disturbance of the seabed caused by the pipeline laying and rig activities to the Danish Environmental Protection Agency. |

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| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|-----------------------------|---|--|--|
| Seabed habitat types | 6.5 The marine habitat types under the Habitats Directive achieve favourable conservation status in accordance with the timeline laid down in the Habitats Directive. | The habitat in the area is offshore circalittoral mud, which total area in the North Sea is 18,170 km ² . The temporary impact from the pipeline laying and the rig activities of the physical disturbance on the seabed is limited. | The project area is not located within a Natura-2000 area. |
| | 6.6 The northern Sound is designated as a marine protected area pursuant to the Marine Strategy Framework Directive, and new licences to extract mineral resources are stopped. This will not result in any changes in relation to the existing fisheries regulation. | Not applicable | The oil and gas industry is not involved in designation of the northern Sound as a marine protected area. |
| | 6.7 The most important habitats contain the typical species and communities for Danish marine areas. | <p>The habitat in the area is offshore circalittoral mud, which total area in the North Sea is 18,170 km². This habitat is probably not viewed as "a most important habitat".</p> <p>The potential temporary impacts on the seabed and the associated species have been assessed as negligible (chapter 9).</p> <p>It is not expected that the project will impact this target.</p> | |
| | 6.8 When threshold values for losses, disturbances and adverse effects are established through co-operation at regional and Union level, the Ministry of Environment and Food will initiate a project to form the basis for establishing environment targets in accordance with the thresholds and good environmental status. | Not applicable | The oil and gas industry is not involved in the work with establishment of environmental targets. |
| | 6.9 Need for protection initiatives for HELCOM and OSPAR Red List habitats is assessed. If there are any natural habitats on the Red Lists that are endangered or not sufficiently protected, the Ministry of Environment and Food will assess specifically the need for further initiatives in collaboration with relevant ministries. | Not applicable | The oil and gas industry is not involved in the assessment of whether Red List species are sufficiently protected. |
| | 6.10 The need for additional marine protected areas or other initiatives in the Baltic Sea and the North Sea is assessed, and a similar assessment is subsequently carried out for the Danish Straits. | Not applicable | The oil and gas industry is not involved in the assessment for marine protected areas in the Baltic Sea or in the North Sea. |

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17.1.7 Descriptor 7 – Alteration of hydrographical conditions

The presence of the substructure of a rig may locally impact the hydrographical conditions. However, as the project does not introduce new substructures, no impacts are expected. Any potential impact on the hydrographical conditions will revert to existing conditions once the rig disappears. The environmental targets for descriptor 7 are described in Table 17-8.

Table 17-8 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 7 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|--|--|----------|
| Alteration of hydrographical conditions | 7.1 Anthropogenic activities that are particularly associated with physical loss of the sea floor, and which cause permanent hydrographical changes only have local impacts on the sea floor and in the water column, and are designed to take account of the environment and what is technically possible and financially reasonable to prevent harmful effects on the seabed and in the water column. | The project will not alter hydrographical conditions. | |
| | 7.2 In connection with licensing off-shore activities requiring an environmental impact assessment (EIA), the approval authority is encouraging reporting to the Danish Environmental Protection Agency (monitoring programme) of hydrographical changes and the adverse effects of these. | The project will not alter hydrographical conditions. | |

17.1.8 Descriptor 8 – Contaminants

Contaminants may potentially arise from planned or unplanned discharges. The regular seabed monitoring performed every three years by the oil- and gas operators in the North Sea generally show a rather local impact if any. The environmental targets for descriptor 8 are described in Table 17-9.

Table 17-9 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 8 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|---------------------|---|--|---|
| Contaminants | 8.1 Discharges of contaminants in the water, sediment and living organisms do not lead to exceeding of the environmental quality standards applied in current legislation | Potential impacts include planned discharges in addition to unplanned discharges/accidental spills. According to the Danish Marine Strategy Directive II threshold values are decided for PFOS, PBDE, benz(A)pyrene and mercury. Only benz(A)pyrene and mercury are present around the installations in very small concentrations. The values | Mitigating measures described in Section 19.6. The laying of pipelines may potentially mobilise contaminants in the sediment. However, as the levels of contaminants are relatively low and below thresholds (6.4.6), no impacts are expected. |

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| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|--|--|--|
| | | can although not directly be compared as the thresholds are defined by concentrations in fish or mussels. For planned discharges the potential impact is assessed to negligible (section 9.3). Accidental spills are assessed in Chapter 11. | |
| | 8.2 Emissions, discharges and losses of PBDE and mercury are ceased or phased out | See 8.1 | |
| | 8.3 The Ministry of Environment and Food contributes to work regionally and in the EU regarding establishment of threshold values and determination of good environmental status and works to ensure that the quantities of contaminants are in accordance here to. | Not applicable. | Information about chemicals used offshore is communicated to the Authorities as part of the discharge applications and permit reporting conditions. |
| | 8.4 There is a gradual decrease in the levels of imposex/intersex in marine gastropods. | Not applicable. | This is a result of the ban of using TBT as antifouling. The oil and gas industry is not engaged in monitoring of imposex/intersex in marine gastropode. |
| | 8.5 By 2021, a process has been carried out to trace the source of the most polluting substances which prevent meeting the environmental targets laid down for surface water bodies in the Water Framework Directive. If necessary, the relevant licences and permits will be revised as far as possible | Not applicable. | See 8.1 |
| | 8.6 The Ministry of Environment and Food is working to ensure that more indicators for contaminants are established | Not applicable. | See 8.1 |
| | 8.7 The Ministry of Environment and Food ensures increased coordination between policy areas/directives when new national environmental quality requirements are set for selected substances in matrices, where there is monitoring data. | Not applicable. | See 8.1 |
| | 8.8 The Ministry of Environment and Food is working to develop additional regional joint tests for biological impacts. | Not applicable. | See 8.1 |

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| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|---|--|---|
| | 8.9 The spatial extent and duration of acute pollution events is gradually reduced as much as possible through prevention, monitoring and risk-based scaling of contingency and response facilities. | Accidental spills are assessed in Chapter 11. Acute pollution events are extremely rare events. The risk of accidental spill and blow-out is furthermore prevented through a number of mitigating measures. | Mitigating measures described in Section 19.6. |
| | 8.10 Adverse effects on marine mammals and birds from acute pollution events are prevented and minimised as much as possible. For example, this may be secured by means of floating booms as well as through contingency plans for marine mammals and birds injured in oil spills | See 8.9 above. | |
| | 8.11 Up to the next monitoring programme (2020), the Danish Environmental Protection Agency will examine how the adverse effects of the most significant pollution events can be monitored and registered in the specific cases | Not applicable. | The new monitoring programme has been issued in 2020. |

17.1.9 Descriptor 9 – Contaminants in seafood and human consumption

The Hejre tie-back to South Arne Development project is situated in an area with low fishery intensity and as such the area is not considered as a core area for seafood. The environmental targets for descriptor 9 are described in Table 17-10.

Table 17-10 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 9 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|--|--|--|
| Contaminants in seafood and human consumption | 9.1 Emissions of contaminants generally do not lead to exceeding of the maximum residue levels applicable in the food legislation for seafood. | Potential impacts include planned discharges in addition to unplanned discharges/accidental spills. For planned discharges the potential impact is assessed to negligible (section 9.3). Accidental spills are assessed in Chapter 11. | Mitigating measures described in section 19.6. |
| | 9.2 Emissions of contaminants generally do not lead to exceeding of the maximum residue levels applicable in the food legislation for seafood. | See 9.1 above | |

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| | 9.3 The Danish Environmental Protection Agency is monitoring developments in relation to emissions of POPs (including dioxins) from wood-burning stoves to assess the need for further initiatives. | Not applicable. | The oil and gas industry does not emit POPs from wood-burning stoves. |
| | 9.4 The Danish Environmental Protection Agency is gradually improving emission estimations of POPs into the air | Not applicable. | The oil and gas industry is not involved in emission estimations of POPs into the air. |
| | 9.5 Danish Veterinary and Food Administration is inspecting concentrations of contaminants, particularly dioxins and PCBs to monitor developments in organisms at risk of containing high concentrations. | Not applicable. | The oil and gas industry is not involved in this inspection. |

17.1.10 Descriptor 10 – Marine litter

All waste generated during construction, production and decommissioning will be transported to Esbjerg by vessel. The waste will be further sorted out to improve recycling, send for further treatment at approved waste treatment plants, send for combustion or for final disposal.

The environmental targets for descriptor 10 are described in Table 17-11.

Table 17-11 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 10 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|---------------|--|---|--|
| Marine litter | 10.1 The amount of marine litter is reduced significantly to achieve the UN goal that marine litter is prevented and significantly reduced by 2025. | No impact as all waste is transported to shore. The potential impacts on waste generation during construction and production is assessed to be negligible (section 8.7 and 9.6). | |
| | 10.2 The Ministry of Environment and Food contributes to work regionally and in the EU regarding establishment of threshold values and determination of good environmental status, and works to ensure that the quantities of marine litter are in accordance hereto | Not applicable. | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 10.3 Losses of fishing gear in Danish waters are prevented to achieve the UN goal that marine litter is prevented and significantly reduced by 2025 | Not applicable. | The oil and gas industry is not involved in activities that result in losses of fishing gear. |
| | 10.4 The Ministry of Environment and Food implements the National Plastics Action Plan and the associated Political Agreement on collaboration of 30 January 2019, with a | Not applicable. | The oil and gas industry is not involved in the implementation of a national plastics action plan. |

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| | view to improving recycling of plastic and reducing plastic litter and pollution from plastic litter | | |
| | 10.5 The Ministry of Environment and Food is working to develop indicators and measurement methods for microplastics in seabed sediments and the water column. | Not applicable. | The oil and gas industry is not involved in developing these indicators and measurements. The oil and gas industry will cooperate with authorities about the framework for the seabed monitoring programme taking place every 3 years. |
| | 10.6 The Danish Fisheries Agency draws up an estimate of the amount of lost fishing gear in Danish marine areas up to 2020. | Not applicable. | The oil and gas industry is not involved in this estimate. |
| | 10.7 The Ministry of Environment and Food prepares a catalogue of potential and targeted measures to prevent marine litter | Not applicable. | The oil and gas industry is not involved in preparation of this catalogue. |

17.1.11 Descriptor 11 – Underwater noise

Underwater noise can be expected during the construction phase. The environmental targets for descriptor 11 are described in Table 17-12.

Table 17-12 Potential impacts from the Hejre tie-back to South Arne Development project on environmental targets for descriptor 11 according to the Danish Marine Strategy II.

| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|-------------------------|--|--|--|
| Underwater noise | 11.1 As far as possible, marine animals under the Habitats Directive are not exposed to impulse sound which leads to permanent hearing loss (PTS). The limit value for PTS is currently assessed as 200 and 190 dB re.1 uPa ² SEL for seals and harbour porpoise, respectively. The best knowledge currently available is on these species. However, it is likely that these limits will be revised as new knowledge on the area becomes available. The values are the sound-exposure level accumulated over two hours. | During construction, operation and decommissioning it is expected that the majority of noise generated will be vessel noise (low frequency) and noise from the use of USBL and LBL (high frequency) during pre-and post-installation survey of the pipeline route, and during pipe laying The potential impacts from noise on fish and marine mammals are assessed to be negligible to minor (section 8.5, 9.7, 10.6). For the European sturgeon noise can be heard up to around 1 kHz, i.e. well below the frequency of USBL/LBL, which will not disturb sturgeons. However, sturgeons hear vibrations from the seabed and will be able to detect the cable laying through the seabed as particle motion. The impacts from underwater noise on sturgeons is assessed to | Mitigating measures described in Section 19.6. |

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| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|--|---|--|
| | | be negligible and is assessed in sections 8.5.2, 9.7 and 10.6. | |
| | 11.2 Anthropogenic activities causing impulse sound are planned such that direct adverse effects on vulnerable populations of marine animals from the spatial distribution, temporal extent, and levels of anthropogenic impulsive sound are avoided as far as possible and such that these effects are assessed not to have long-term adverse effects on population levels. | See 11.1 | |
| | 11.3 Activities by the authorities under the Ministry of Defence that cause impulse noise in the marine environment are, as far as possible, being assessed and adapted to reduce possible adverse effects on marine animals under the Habitats Directive, provided this does not conflict with national security or defence objectives. Defence Command Denmark applies current NATO standards when carrying out environmental assessments. | Not applicable. | The oil and gas industry is not involved in these activities. |
| | 11.4 When conducting preliminary seismic studies, adequate remedial action is taken in accordance with the Danish Energy Agency's guidelines on standard terms and conditions for preliminary studies at sea. | Not applicable. | The preliminary studies are conducted according to the DEA guideline. No seismic investigations are needed. |
| | 11.5 The Ministry of Environment and Food contributes to work regionally and in the EU regarding establishment of threshold values and determination of good environmental status and is working to ensure that the level of underwater noise is in accordance hereto. | Not applicable. | The oil and gas industry is not involved in the work with establishment of threshold values. |
| | 11.6 In connection with licensing offshore activities requiring an environmental impact assessment (EIA), the approval authority is encouraging reporting to the Danish Environmental | Not applicable. | The project will report impulse noise and use of USBL and LBL if relevant. |

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| | Targets | Impact from the Hejre tie-back to South Arne Development project | Comments |
|--|--|--|--|
| | Protection Agency (monitoring programme) of registrations of impulse noise. | | |
| | 11.7 Through increased monitoring, the Ministry of Environment and Food is improving knowledge about the extent and levels of low-frequency noise in the Baltic Sea and the North Sea. | Not applicable. | The oil and gas industry is not involved in monitoring of low frequency noise. |

Based on the assessment above and the summary prepared below (Table 17-13), it is concluded, that the Hejre tie-back to South Arne Development project will not prevent or delay the achievements of good environmental status for each descriptor as defined by targets in the Danish Marine Strategy II.

Table 17-13 Potential impacts on the 11 descriptors given by the Marine Strategy Framework Directive is summarised below. The environmental risk of preventing or delaying good environmental status is assessed.

| Descriptor | Assessment of potential impact |
|--|--|
| D1 Biodiversity | Potential impact on species and habitats include impacts from airborne and underwater noise, light, spreading of sediment, physical disturbance of seabed, planned discharge, accidental spill of oil and chemical and risk of blowout. The potential impacts are assessed either to be negligible or no impact The impact on the environmental targets for descriptor 1, biodiversity, will not prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |
| D2 Non-indigenous species | International vessels can introduce non-indigenous species through marine fouling and discharge of ballast water. The risk of introduction of new non-indigenous species is considered low. Due to the low risk of a major impact on the environmental targets for descriptor 2, non-indigenous species, it is assessed that the project will not prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |
| D3 Commercially exploited fish stocks | Commercially exploited fish stock can potentially be affected by physical disturbance, spreading of sediment, underwater noise, planned discharge of chemicals and unplanned oil spill (blowout). It is assessed that the potential risk of affecting fish stocks is negligible. The potential impacts on the environmental targets for descriptor 3, commercially exploited fish stocks, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |
| D4 Marine food webs | Marine food webs can potentially be affected by physical disturbance of the seabed, spreading of sediment, underwater noise, artificial light, planned discharge of chemicals and unplanned oil spill (blowout). The potential impacts on the environmental targets for descriptor 4, marine food web, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |
| D5 Eutrophication | There will be no impact on descriptor 5, eutrophication and it is assessed that the project will not prevent or delay the achievement of good environmental status for this descriptor as defined by its targets. |

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| Descriptor | Assessment of potential impact |
|---|---|
| D6 Sea floor integrity | <p>The seafloor integrity will be temporarily affected during pipelay due to physical disturbance of the seabed and by the rig activities for well perforation and clean-up activities. The pipelines will be buried >1 m below the seabed and the integrity of the seabed is expected to recover few years after pipelay.</p> <p>It is assessed that the potential risk of affecting the sea floor integrity is negligible.</p> <p>The potential impacts on the environmental targets for descriptor 6, sea floor integrity, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D7 Alteration of hydrographical conditions | <p>The hydrography may be impacted by the presence of the rig for well perforation and clean-up activities.</p> <p>The project will not alter hydrographical conditions.</p> <p>The potential impacts on the environmental targets for descriptor 7, alteration of hydrographical conditions, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D8 Contaminants (concentrations and species health) | <p>Discharge of produced water and production chemicals will not exceed threshold values set in the Marine Strategy II.</p> <p>The potential impacts are assessed to be negligible.</p> <p>Acute pollution events include accidental spill and blow-out. These are extremely rare events. The risk of accidental spill and blow-out is furthermore prevented through a number of mitigating measures.</p> <p>The potential impacts on the environmental targets for descriptor 8, contaminants, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D9 Contaminants in fish and other seafood for human consumption. | <p>Measurable contaminants in fish and other seafood will only occur as a result of major oil spill.</p> <p>It is assessed that the potential risk of affecting the contaminants in fish and other seafood for human consumption is negligible.</p> <p>The potential impacts on the environmental targets for descriptor 9, contaminants in fish and other seafood for human consumption, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D10 Marine litter | <p>Littering will be prohibited on the platform and all waste are collected, sorted and send to shore.</p> <p>The potential impacts are assessed to be negligible.</p> <p>The potential impacts on the environmental targets for descriptor 10, marine litter, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |
| D11 Underwater noise | <p>During construction, production and decommissioning it is expected that the majority of noise generated will be vessel noise (low frequency) and noise from the use of USBL and LBL (high frequency). The use of USBL and LBL will be mitigated and noise levels will therefore not exceed the thresholds for PTS set in the Marine Strategy II. The potential impact from noise is assessed to be negligible to minor.</p> <p>The potential impacts on the environmental targets for descriptor 11, underwater noise, are assessed not to prevent or delay the achievement of good environmental status for this descriptor as defined by its targets.</p> |

It is noted that eight protected areas under the Marine Strategy Framework Directive have been designated in the North Sea. However, as the project is not located within these areas and this protection regulates activities within the area itself but not activities outside the protected area (Ministry of Environment 2021), these protected areas are as such not relevant for the project.

The Danish Environmental Protection Agency (DEPA) has issued a monitoring programme specifically for the Marine Strategy Framework Directive (Ministry of Environment 2023). Monitoring activities have been defined for each of the 11 descriptors. The Hejre tie-back to South Arne Development project is assessed not to impact any of the monitoring activities described in the monitoring programme (Figure 17-1).

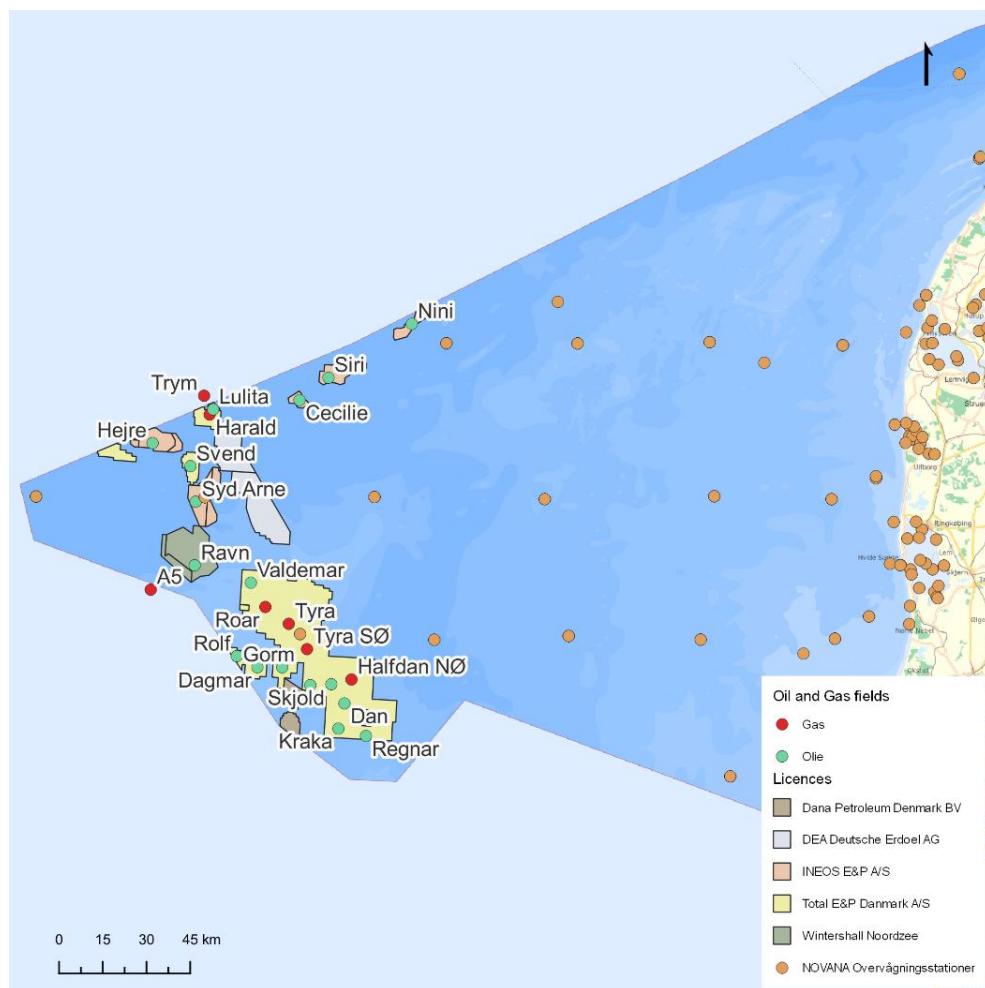


Figure 17-1 Location of NOVANA monitoring stations designated under the marine strategy framework directive.

Denmark's current programme of measures is from 2023 (Ministry of Environment , 2023);. Measures have been introduced for each of the 11 descriptors and include measures and efforts to be implemented to achieve or maintain a good environmental status. The Hejre tie-back to South Arne Development project is assessed not to impact any of the measures described in the programme of measures.

Multiple pressures may impact the marine environment. If these pressures enhance the overall impact beyond what each pressure would, they are called cumulative impacts. According to the Marine Strategy Framework Directive there is a requirement to assess the cumulative impacts, both from pressures within the same project (discussed below) and from pressures from different projects (discussed in section 14). When assessing cumulative impacts, aspects like the duration of the impact, severity of impact, location for the impact and its vulnerability must be considered.

During the construction phase, benthic infauna and fish may potentially be impacted simultaneously by spreading of sediment and discharges (planned and unplanned discharges/accidental spills) and marine mammals may be simultaneous impacted by underwater noise and unplanned discharges/accidental spills. These impacts are all classified as negligible. In addition, fish and marine mammals will swim away from

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potential impacts from spreading of sediment and noise impacts, thus reducing the risk of impacts from discharges. Finally, unplanned discharges/accidental spills occur very rarely. Based on these considerations it is concluded that the potential cumulative impacts will not prevent or delay the achievements of good environmental status for each descriptor in the Danish Marine Strategy II.

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18. Monitoring programme

A monitoring programme is already in place for South Arne and a similar monitoring programme will be set up for Hejre in agreement with relevant authorities and based on legal requirements in legislation and permits.

18.1 Environmental monitoring programme – Production and drilling activities

The environmental monitoring programme is expected to include:

Daily monitoring of:

- Dispersed oil in produced water (mg/l)
- Volume of discharged produced water (m³)
- Flaring volume (m³)
- Volume of diesel or fuel gas used in
- turbine (m³)
- CO₂ emissions (ton)
- NO_x emissions (kg and mg NO_x/m³)

Quarterly monitoring of:

- Radioactive substances in discharged produced water
- Oil in water correlation curve

Yearly monitoring of:

- Dissolved oil in produced water
- Use of chemicals (kg)
- Control measurements for calibration of the NO_x emission prediction model

Based on the monitoring results the following are reported to authorities:

- Monthly report on oil in produced water and year to date oil discharge including explanation of any irregularities in the production, which has caused higher values
- Yearly prognosis for use and discharge of production chemicals, which is updated if a new chemical is approved and taken in to use
- Yearly reporting on emission of CO₂ and NO_x
- Use and discharge of drilling chemicals if drilling has taken place
- Amount of NORM stored onshore
- In addition to the monitoring described monthly information about the waste produced at the installation and handled onshore is generated by the waste handling company.

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18.2 Evaluation of environmental risk of discharges to sea

A risk-based approach for produced water management has been developed and agreed between the OSPAR contracting parties. An OSPAR guideline has been prepared based on the OSPAR 2012/5 Recommendation. The guideline describes a procedure, which is adopted in Denmark as shown in Figure 18-1 below. The substance-based approach is required for all installations with discharge of produced water. New installations like Hejre should prepare a substance-based risk assessment within the first half year of production. Since no discharges will take place at Hejre, the risk assessment for South Arne will be updated instead.

The impacts from the discharge of produced water are calculated based on the following input:

- Location and release depth of the discharge point
- Produced water rate
- ReInjection rate
- Produced water composition based on:
- Composition of the oil based on samples
- Concentration and toxicologic data of added chemicals
- A 3-dimensional hydraulic model
- Predicted No Effect Level (PNEC) for both oil and added chemicals

Based on the input the concentrations of oil and added chemicals are calculated and compared with PNEC. The calculated impact on the surrounding marine environment is illustrated Figure 18-1.

Based on the PEC/PNEC, the environmental risk is calculated for a predefined volume of water. The resulting EIF (Environmental Impact Factor) is an expression of the risk level from discharge of the produced water. Calculation of EIF is based on a combination of the calculated concentrations and the sensitivities of the species represented in the area. In Denmark it is decided that the EIF of 10 or below is acceptable and no mitigating actions are required. EIF calculations must be made at least every 5 years. The latest EIF calculation for South Arne is from 2022 based on production and chemical data from 2021. The EIF is well below 10 and mitigating actions have not been required. EIF is low at South Arne due to the high produced water reinjection rate limiting the discharge to sea.

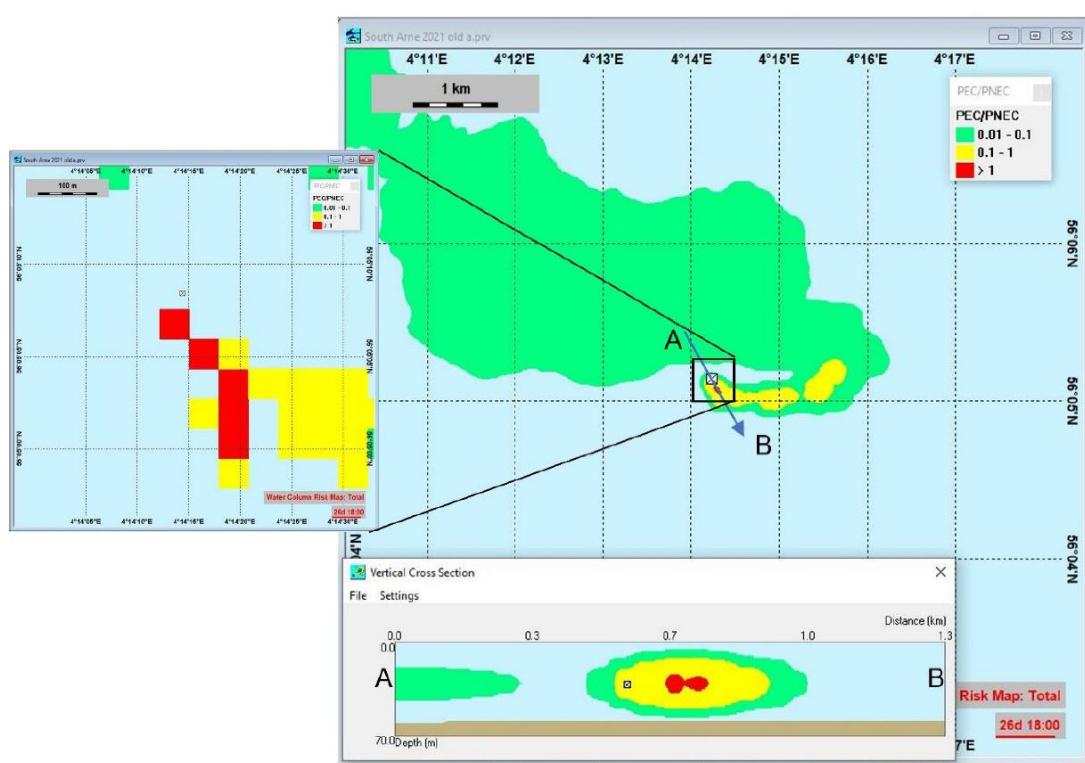


Figure 18-1 Example of a PEC/PNEC snapshot calculation of risk for a worst-case scenario from South Arne in the report for 2021 (NORCE, 2022).

The overall EIF and the % contribution to EIF from each component in the produced water is shown in the figure below.

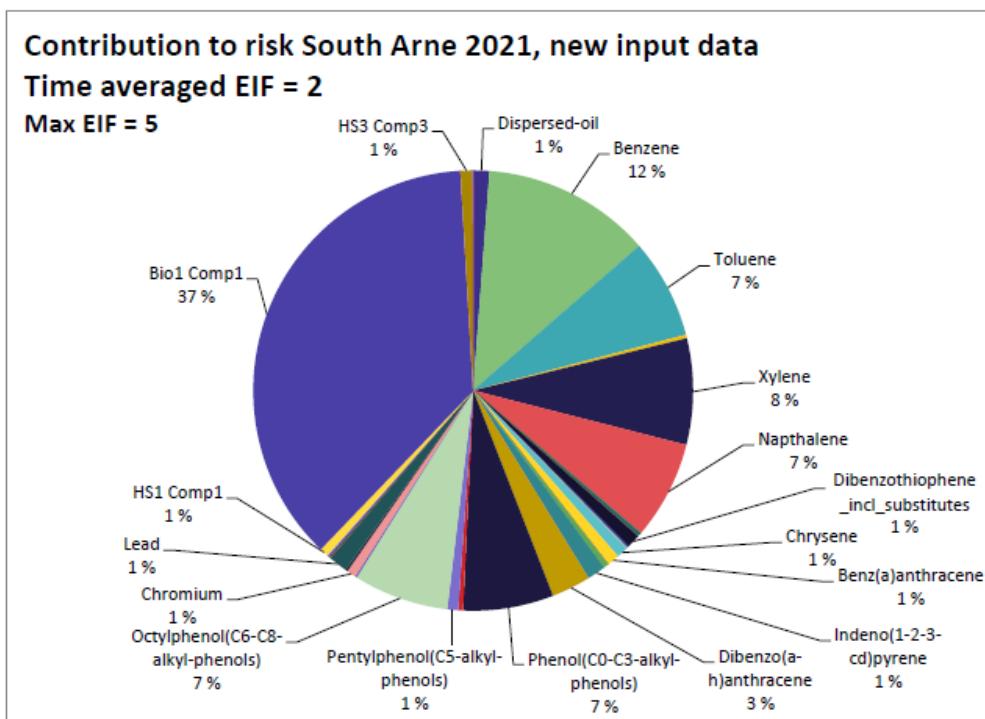


Figure 18-2 Contribution to the risk from different components in the produced water.

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The information makes it possible to evaluate which components to look at to minimize the overall risk from discharge of produced water. As can be seen from Figure 18-2 almost 2/3 of the environmental risk can be assigned to naturally occurring components and about 1/3 can be assigned to added chemicals. At South Arne it is evident that a component in one of the biocides (Bio1_Comp1) constitute the majority of the environmental risk (37%).

18.3 Seabed monitoring

A monitoring programme for the Danish part of the North Sea is agreed with the Danish Environmental Protection Agency including monitoring of the environmental status of the seabed around the Danish installations.

The survey takes place every third year. The Danish operators and DEPA agree on the installations to be included in the specific surveys.

In addition to the regular surveys baseline surveys has been carried out for all installations before start-up of production. Baseline surveys have both been carried out for South Arne (2021) and Hejre (2013).

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19. Project design and impact mitigation

19.1 General operations

In general, a range of parameters are applied through INEOS's general environmental management system including proper working procedures to minimize the environmental impact from operation, using BAT and BEP (best available technology and best environmental practice) in the process of selecting the technical solutions. Also, it is considered a general INEOS practice to have proper contingency plans in place with established working procedures to minimize the effects of incidents or to effectively collect spills, should an incident happen.

INEOS also systematically register and analyse incidents and near-miss events to prevent unintended environmental impact in the future.

In the following is a brief description of how and which project adaptations are applied. The adaptations are through environmental management procedures conducted generally by INEOS in relation to the re-development of Hejre and other installations owned by INEOS and the need for specific mitigating measures are considered for the current tie-back project.

19.2 QHSE Policy

INEOS systematically works on reducing the environmental impact of its offshore activities. This has the following influence on a project like the re-development of Hejre:

- Continuous work on reducing the project's impact on the environment from an overall perspective
- Continuous and systematic work on reducing the use and discharge of chemicals
- Implementation of working procedures for storage of chemicals at the platform to reduce the risk of incidents and spills
- Analysis and registration of incidents and near-miss events to prevent unintended environmental impact in the future
- The principles of BAT and BEP (best available technology and best environmental practice) are used in the process of selecting the technical solutions
- The Hejre platform will be comprised by INEOS's oil spill contingency plan with established working procedures to minimise the effects of incidents or to effectively collect spills, should an incident happen.
- INEOS works in cooperation with operators of spill response equipment on emergency response agreements and has agreements with other offshore operators (national as well as international via Operators Co-operative Emergency Service) for mutual assistance in case of major offshore accidents as described in Chapter 11.4.

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19.3 Operational excellence

Some of the most important factors in relation to minimizing the environmental impacts as discharge to sea and emissions to air is a stable production, reduction of slugging and limiting the number of unplanned shutdowns.

A control system for South Arne is in place, and a control system is planned for Hejre to be able to follow the production and the performance of the process systems in detail. Regular reviews are and will be performed of the process alarm settings among others to avoid unplanned shutdowns.

An energy efficiency review is prepared yearly for the South Arne Complex evaluating ongoing initiatives and describing coming initiatives to be evaluated and if reasonable implemented.

19.4 Discharges to sea

During the Hejre tie-back project several BAT and BEP considerations have been performed in relation to the technical solutions to reduce the impact to the environment in relation to discharge to sea. A short description of the evaluations is described below.

19.4.1 Produced water reinjection

With the new concept the produced multiphase from Hejre will be exported to South Arne where it will be processed there is therefore possibility for produced water reinjection.

19.4.2 Selection and use of chemicals

In general INEOS will select chemicals which are classified as green or yellow and only use chemicals approved for offshore use and discharge by the DEPA. INEOS is continuously seeking to reduce the amount of chemicals used thereby reducing the environmental impact.

19.4.3 Oil spill contingency plan

INEOS has established a legally binding cooperation arrangement with Total E&P Denmark for mutual assistance in case of an oil spill incident from one of the operator's production installations (INEOS Energy, 2024). This arrangement ensures that four containerized DESMI fast sweep oil collection systems will be available for containing and collecting spilled oil, depending on the magnitude of the spill. In case of blow-out, further resources will be provided by Oil Spill Response Ltd (OSRL). In Denmark, the preferred response strategy is containment and recovery of spilled oil. Dispersant spraying may be used based on case-by-case approval from the DEPA. Details on the specific equipment available for the preferred response strategy (mechanical containment and recovery) for the three Tier responses are outlined in Chapter 11.4.

19.5 Emissions to air

The Hejre re-development concept eliminates the need for a turbine on Hejre since power will be supplied from South Arne. During developing of the Hejre tie-back to South Arne concept the following initiatives which can have an impact on emission to air have been evaluated. The initiatives are described in Table 19-1 below.

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Table 19-1 Overview of initiatives having an impact on emissions to air.

| Initiative | Impact on emission to air |
|--|--|
| No gas turbine on Hejre | All power for Hejre is supplied from South Arne via power cable. There are low NOx turbines on South Arne, resulting in less air emissions compared to a non-low-NOx turbine on Hejre. |
| Electrical driven crane installed instead of diesel driven | Using electricity produced from the turbine result in less emission to air compared to using diesel as fuel for the crane. |
| Design for shut-in pressure and thus no flaring at Hejre | No flaring will occur on Hejre. |
| Air cooling fans instead of sea water cooling. | Seawater cooling will require pumps instead of cooling fans. Fans are less power consuming than pumps resulting in less emission to air. |

In addition to the initiatives mentioned in the Table 19-1 above INEOS has reviewed the possibilities to reduce the number of supply boats and helicopter flights among others by bundling maintenance activities in campaigns and coordinating helicopter flights with other operators.

19.6 Underwater noise

For the pre- and post-installation USBL using ROV survey of the pipeline route, and for the pipeline and cable laying itself the project will adhere to "Standard terms for preliminary investigations at sea" from the Danish Energy Agency (2018). A slow start procedure for USBL and LBL will be followed with a single signal emitted every 30 second for respectively 22 and 30 minutes to prevent hearing impairment in marine mammals.

19.7 Non-indigenous species

The potential risk of introducing non-indigenous species that may be invasive is at the same level as for other vessels in Danish waters arriving from international waters. The vessels (including rig) are following IMO standards to prevent introduction of non-indigenous species through ballast water. In addition, some measures to mitigate against impacts from non-indigenous species available, including installation of a ballast water treatment system or vessel requirement of regular removal of marine fouling on the vessel's sides.

19.8 Impact mitigation

The mitigation of hearing impairment in marine mammals caused using USBL/LBL is described above (chapter 19.6). All other potential impacts described in Chapters 8-17 are assessed to be either 'insignificant' or 'low', and there are therefore no proposed mitigation measures.

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20. Data quality and limitations

20.1 The surrounding environment

The North Sea is a well-mapped area in terms of biological and physical parameters. The Hejre and South Arne fields are furthermore well surveyed.

20.1.1 Plankton

The plankton distribution and species composition in the North Sea is well known due to continuous surveying which has been ongoing for several years (OSPAR). The surveying is carried out from ships equipped with automated plankton samplers collecting samples from all over the North Sea.

20.1.2 Benthic infauna

The benthic infauna in the North Sea, including at the Hejre and South Arne fields, is well described in a comprehensive study of benthic fauna in the North Sea published by Reiss in 2010. These findings were confirmed by a baseline study carried out at Hejre during 2013 and by regular studies at South Arne and a reference station (DONG 2013, INEOS 2022).

20.1.3 Fish

Fish distribution in the North Sea is well documented. ICES has an electronic atlas based on ICES' International Bottom Trawl Survey (IBTS), which has been carried out since 1970. The ICES database is linked to DATRAS.

Distribution of fish spawning areas are based on published data available from ICES' Working Group 2 on North Sea cod and plaice egg surveys in the North Sea (WGEGGS2). The working group collects data on fish eggs and larvae of a large number of species in the North Sea. The data on spawning areas for sand eel is public available data from DTU aqua (van Deurs et al. 2019).

There is little knowledge on the whereabouts of European sturgeon in the North Sea (Møller & Carl, 2019). The species is primarily coastal and the few bycaught individuals from the North Sea are thought to derive from release programs in German rivers (Visser et al 2020). It is therefore doubtful and uncertain if they are present or well be encountered near Hejre.

20.1.4 Birds

The seabird distribution in the North Sea is based on a substantial number of reports and data, including data from the OBIS Seemap (2013) and the online database hosted by the Joint Nature Conservation Committee (JNCC) in the UK. Several European organisations have contributed with data to this database using standardized methods for bird counting primarily from ships.

20.1.5 Marine mammals

Data on the description of the distribution of marine mammals in the North Sea is considered adequate for this environmental impact assessment. Several studies have investigated the distribution of seals and harbour porpoise in the North Sea (Hammond et al. 2013, Geelhoed et al. 2014, Gilles et al. 2023, Kyhn et al. 2024). Some of the studies were initiated as part of environmental impact assessments of offshore wind-farms.

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20.2 Environmental assessment of emissions to air

The assessment of emissions to air is attached with some uncertainties regarding the fuel consumption, emission factors, days of operation of vessels etc.

The emission factors that are used calculating emissions from vessels are generic emission factors. This also means, that the actual emission from vessels could be different if measuring the emissions.

Likewise, the fuel consumption are generic data, as the actual vessel fleet is not decided upon yet, and thus it could be other types of vessels used when actually carrying out the work. However, it is tried to use data for vessels that could be expected to be used.

The estimated days of operation are estimated and include weather delays and other unforeseen events. Thus, these can be expected to be conservative.

20.3 Environmental assessment of planned discharges

The assessment of planned discharges of chemicals is based on the concept and design of the Hejre tie-back to South Arne combined with experience from other oil and gas developments in the North Sea.

The assessment is based on:

- Discharge amounts of the different types of chemicals
- Discharge patterns
- Assessment of the ecotoxicity of the chemicals

The amount and type of chemicals to be used have been assessed based on best available estimates from INEOS together with experience from previous projects and information from chemical suppliers. The specific chemicals to be used has not yet been settled, however, the environmental impact (colour code) will not increase. The assessment of the impacts from the discharge of chemicals is based on ecotoxicological data provided in the HOCNF documents for the chemicals or pre-screening documents and thus a conservative estimate for the toxicity is used, as the toxicity for the original chemicals are used as a worst-case scenario though some of the product will degrade into reaction products with a lower toxicity.

These data have been used in the modelling of impacts.

The dispersal modelling has been carried out using a model developed by COWI, based on the CHARM-model⁸ developed by the industry, chemical suppliers and members of OSPAR. The dilution part of the model is a slightly modified version of the CHARM model, and estimations of risk indicators of negative environmental effects (PNEC and PEC/PNEC ratios) are calculated according to OSPAR guidelines. The dispersion model calculates PEC/PNEC ratios in up to 5000 meters from the discharge point. Consequently, if the PEC/PNEC ratio does not drop below 1 before 5000 meters the distance is stated as >5000m.

By the use of the dilution model, the distance at which the chemical will impact the pelagic environment may be calculated. Rapid dilution of the discharges and biodegradation in the water column is ignored.

⁸ CHARM = Chemical Hazard Assessment and Risk Management (Thatcher et al., 2017).

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The distance at which the chemical will impact the benthic environment is calculated under the assumption that the sedimenting particles settle evenly around the platform under the influence of a standard refreshment rate of the seawater. Biodegradation in the sediment is assumed to occur only approx. 10 % of the time due to bioturbation of anaerobic marine sediments and resulting oxygen depletion.

The potential for bioaccumulation of discharged chemicals is assessed on the basis of information on bioconcentration factors (BCF) or octanol-water partition coefficients (P_{ow}). The potential for bioaccumulation is not quantified.

The model considers the conditions in the North Sea with a current velocity of 0.05 m/s. The flowrate of produced water is 2,781 m³/day based on data from the Solsort EIA. The flow is modelled as continuous over 24 hours per day. As the point of discharge for produced water at South Arne is above sea level, the results are modelled with discharge point at surface.

The modelled concentrations are shown in Table 20-1 below.

Table 20-1 Modelled concentrations for chemicals discharged at South Arne.

| Type of chemical | Modelled concentration (ppm) |
|---------------------|------------------------------|
| Defoamer | 1.18 |
| Corrosion inhibitor | 5.5 |
| Demulsifier | 0.41 |
| Scale inhibitor | 4.11 |
| Wax inhibitor | 600.95 |

The input and the model are attached with a range of uncertainties including:

- Uncertainties related to the actual products to be used
- Uncertainties related to estimated amounts of chemicals to be used and discharged
- Uncertainties related to the chemical testing including ecotoxicity of the chemicals
- Uncertainties related to the model

The products modelled are what is expected to be used at the moment. However, the exact product is not yet decided upon, and thus the exact ecotoxicity profile can vary. However, it can be expected that the products used will be within the predicted pre-screening categories.

The exact amounts and discharges are estimated at the moment and thus can be expected to be a conservative estimate and may vary with up to a factor 2.

The results are based on a range of assumptions of the processes taking place and are based on testing results. E.g. the partitioning coefficient are based on LogPow values and the ecotoxicity data is also based on tests conducted for different trophic levels. These data are also attached with uncertainties and thus an assessment factor is applied in the magnitude of a factor 10-1000.

The model is likewise attached with uncertainties e.g. the concentration in the sea is attached with uncertainties due to fluctuations in the discharge and variations in the sea current. Thus, the model includes conservative calculations of the conditions.

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As described above the results are attached with a whole range of uncertainties ranging from a factor min. 10-1000, which added together could impact the results. However, conservative estimates are incorporated and thus the results are highly conservative.

20.4 Environmental assessment of accidental discharges

The distribution of a potential oil spill from the Hejre re-development is projected by the OSCAR model, which is regarded as a highly reliable model that has been in use for many years.

20.5 Environmental assessment of pipeline laying, noise and light

The environmental impact of pipeline laying is well documented from several studies. Likewise, environmental impacts of machinery, ship noise and ROVs on marine mammals and the impact of light on birds are well documented.

20.6 Socio-economic assessments

The socio-economic assessments are based on up-to-date fisheries data from the Danish AgriFish Agency covering the years 2014-2018.

20.7 Cumulative effects

The cumulative effects are based on the strategic environmental assessment for the project area carried out in 2012 (Danish Energy Agency, 2012) and the technical report from DCE on the human uses, pressures and impacts in the eastern North Sea (Andersen et al., 2013) and information from DEA.

In addition to the above-mentioned references the DEA has appointed several areas for future wind farms and an energy island.

Information on EU projects on common interest is published regularly on an EU homepage⁹.

⁹ https://energy.ec.europa.eu/topics/infrastructure/projects-common-interest/key-cross-border-infrastructure-projects_en

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APPENDIX A FATE AND EFFECT OF OIL SPILL

Introduction

This appendix briefly describes the fate and effects of oil spilled at sea.

Fate of oil

Oil released during a blow out or other types of spill undergoes the following processes: (Figure 1 Processes affecting oil spilled at the surface (Source: Flowing data 2010)):

- Spreading
- Evaporation
- Dispersion
- Dissolution
- Emulsification
- Oxidation
- Sedimentation and
- Biodegradation

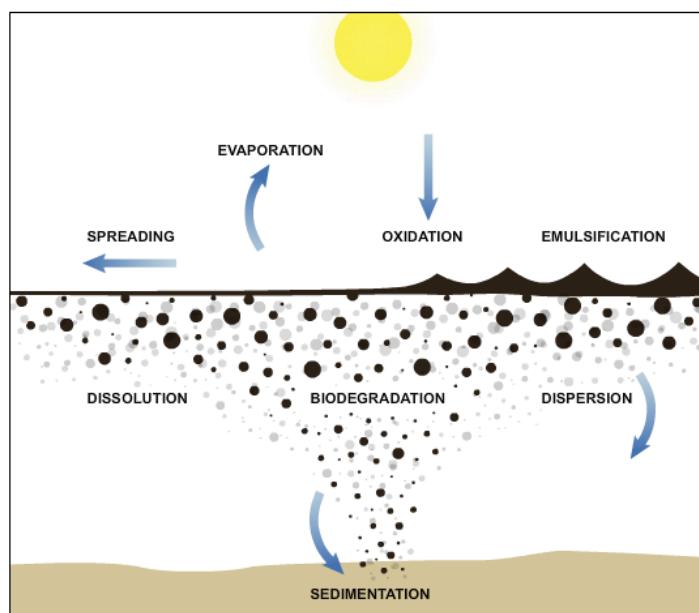


Figure 1 Processes affecting oil spilled at the surface (Source: Flowing data 2010)

The processes of spreading, evaporation, dispersion, emulsification and dissolution are most important during the early stages of a spill whilst oxidation, sedimentation and biodegradation are more important later on and determine the ultimate fate of the oil Figure 2.

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Rate and scale of the different processes are dependent on:

- The physical and chemical characteristics of the oil;
- Temperature, wind and currents and
- Whether the oil is spilled beneath or on the surface of the water

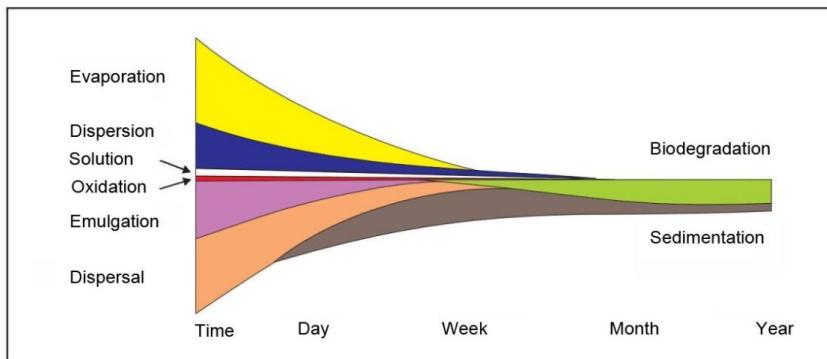


Figure 2 Overview of the relative significance of the different physical and chemical processes that affects spilled oil at sea as a function of time (after ITOPF 2002).

Table 1 Processes that affects oil spills (ITOPF 2019 and 2002)

| Description of processes |
|---|
| Spreading. On the sea surface the oil will quickly be spread by wind and currents in a film of thin, narrow slicks parallel to the wind and current direction and will cover extensive areas of the sea surface. |
| Evaporation. The volatile components of the oil will evaporate to the atmosphere within a short period of time. The rate of evaporation is dependent on temperature, atmospheric pressure and the surface area of the oil film, the rate increasing with increasing temperature, decreasing atmospheric pressure and increasing surface area. |
| Dispersion. Waves and turbulence can break all or part of the oil slick into fragments and droplets of varying size that will be mixed into the upper layers of the water column. Some of the smaller droplets will remain suspended in the water column while the larger ones will tend to rise back to the surface, where they may either coalesce with other droplets to reform a slick or spread out to form a very thin film. |
| Dissolution. The lighter water-soluble components of the oil, such as light aromatic hydrocarbons compounds like benzene and toluene, may dissolve into the surrounding water but most of these components will evaporate |
| Emulsification. Due to wave action sea water droplets may become suspended in the oil, forming water-in oil emulsions (often called chocolate mousse), which is usually very viscous and quite persistent. |
| Oxidation. Hydrocarbons can react chemically with oxygen forming either soluble compounds or persistent tar balls with a solid outer crust surrounding a softer, less weathered interior. Such tar balls, are often found on shorelines |
| Sedimentation. Some heavy refined products or dispersed oil that mix with suspended solids have a higher density than seawater and may sink to the bottom. This process mainly takes place on shallow waters that are often laden with suspended solids providing favourable conditions for sedimentation. |
| Biodegradation. Seawater contains a range of microorganisms that can degrade oil components to water soluble compounds and eventually to carbon dioxide and water. However, some compounds in oil are very resistant to attack and may not degrade. |

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Potential biological impacts of oil spill

In the unlikely event of a blowout of oil and in a situation when oil-spill response measures not can be activated, the environmental impacts may be severe. The sensitivity of different groups of organisms and habitats vary markedly. Table 1 and table 2 give overviews of the vulnerability of different groups of species and habitats in open waters and on shallow coastal waters and shorelines, respectively.

In general, environmental impacts of oil spill are most severe if the slick of petroleum hydrocarbons reaches shallow coastal waters and the shore, or if the slick passes concentrations of seabirds which are particularly sensitive to oil spills.

Table 2 Overview of potential impacts of oil spills on different groups of organism and habitats in open waters.

| Potential impacts in open waters. |
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| Impacts on plankton. Plankton populations are not particularly vulnerable to oil spills. It is well established that plankton is sensitive to oil exposure and consequently short-term impacts would be expected in the immediate vicinity of the oil. However, plankton is abundant, will naturally suffer very high levels of mortality and has an enormous regeneration capacity. As a result, long lasting effects on plankton is not expected and long-term effects of oil spills on phyto - or zooplankton communities have not been observed to date (ITOPF 2002, Khalaf 2006, Anon 1985, Falk Petersen et al. 1998 and Kühnholz 1977). |
| Impacts on pelagic fish, fish eggs and fish larvae. There is no evidence to date that any oil spill in open offshore waters has affected the size of fish populations. Laboratory experiments have shown that oil is very toxic to fish eggs and larvae (Falk-Petersen & Kjørsvik 1987, Serigstad & Adoff 1985, Tilseth, Solberg & Westrheim 1984). However, in several studies effects on pelagic fish eggs and larvae were not observed in the field following oil spills. One reason for this may be that toxic concentrations of oil components are generally confined to the uppermost parts of the water column immediately beneath an oil slick and that fish eggs and larvae are encountered below the toxic water layers. Other studies have demonstrated massive kills of fish eggs and larvae in the vicinity of oil spills without causing any effect on fish populations. The lack of effects on numbers in subsequent adult populations following massive kills of eggs and larvae is probably because most fish species produce vast numbers of eggs and larvae and because most species have extensive spawning grounds (IPIECA 2000). Impacts on adult offshore pelagic fish have not been demonstrated. Fish eggs or larvae are not considered particularly sensitive to oil. This is because they do not surface. Hence contact with floating oil is usually minimal (see Neff, 1991), certainly compared to seabirds, marine mammals and turtles. Hydrocarbon levels that effect fish are considerably higher than levels contained in surface oil slicks (see Volkman et al., 1994). |
| Impacts on seabirds. In open waters, mainly seabirds are threatened by oil spills. It is well-documented that seabirds are extremely vulnerable to oil spills and that large amounts of seabirds are often killed in connection with an oil spill in areas where seabirds are concentrated. The reason for seabirds being especially vulnerable is that they are often in contact with surface water and that the oil destroys the buoyancy and the isolating quality of the plumage. Birds smothered in oil will usually die of cold or starvation or drown. Even very small spots of oil may be fatal, especially during winter. Mainly seabirds that stay on the sea surface for longer periods are at risk, but all types of seabird may be affected (Trosi et al 2016, Garcia 2003, Peterson et al. 2003, Exxon Valdez Oil Spill Trustee Council 1994, Burger 1993). |
| Impacts on cetaceans and seals. Whales, dolphins and seals are less vulnerable than birds, but they may be affected due to evaporation of volatile toxic components from the oil slick on the sea surface. If they emerge at the surface to breathe in the middle of an oil slick, they may inhale toxic vapours. Exposure to toxic petroleum hydrocarbon fumes may irritate eyes and lungs, cause drowsiness, impairs coordination or breathing which in turn may bring about drowning (Trosi et al 2016, Hammond et al. 2004). |

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Table 3 Overview of potential impacts of oil spills on different groups of organism and habitats on shallow coastal waters and shoreline.

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| Potential impacts on shallow coastal waters and shoreline. |
| Impacts on sea grasses. In most cases, oil will flow above the seagrass without causing damage. However, sea-grass beds may be affected if oil is brought in contact with seagrass as described for corals above (Durako et al. 1993). |
| Impacts on shallow water benthic fauna and demersal fish. Benthic fauna organisms are generally very sensitive to oil spill and elevated concentrations of toxic oil components in the water. There are numerous examples of severe impacts on benthic fauna following oil spills. However, impacts have only been observed on shallow water along the coasts where toxic concentrations may reach the seabed. In general, benthic fauna has a high recovery potential. Recolonization by most species is quite rapid but the recovery of certain sensitive species may be prolonged (such as species of crustaceans and mussels) (Basque Research 2009, SEEEC 1998, Dyrinda 1996, IPIECA 2000, Kingston, et al. 1995, Kingston et al. 1997, Dauvin 1998). There are also examples of demersal fish and spawning grounds for fish with demersal eggs on shallow waters have been affected by oil spills (Exxon Valdez Oil Spill Trustee Council 2009, Brown and Carls 1998, Peterson et al. 2003, Wright et al. 1997) |
| Impacts on waterfowl and shorebirds. Shorebirds and waterfowl are often concentrated on tidal flats and are very vulnerable to oil spills. Apart from the impacts on plumage described for the offshore birds waterfowl and shorebirds may be affected as a result of toxic effects after the ingestion of oil during preening, ingestion of oiled prey, inhalation of oil fumes or absorption of oil through skin or eggs and indirect effects resulting from destruction of bird habitats or food resources (Evans et al. 1993) |
| Impacts on shorelines. Shorelines, more than any other part of the coastal environment, are exposed to the effects of floating oil. Oil stranded on beaches often gives rise to concern because it may affect several ecological and social conditions. Further, the cleaning of oiled beaches may be costly. The vulnerability of shorelines differs considerably depending on the type of habitat with respect to how easy they are to clean up after an oil spill. The sensitivity of different coastal habitat can be ranked as follows (with increasing sensitivity: 1) Exposed headlands and wave-cut rocky platforms, 2) Fine grained sandy beaches, 3) Beaches of mixed sand and coarser sediments (gravel, pebbles and boulders) 4) Beaches of a range of gravel, pebbles and boulders, 5) Sheltered rocky shores, 6) Sheltered tidal flats, 7) saltmarshes (IPIECA 1996). |

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