

## **2 ENVIRONMENTAL MANAGEMENT AND REGULATION**

### **2.1 Ithaca Health, Safety and Environmental Policy**

The Athena Field Decommissioning Programmes will be conducted in a manner consistent with Ithaca Energy (UK) Ltd Health, Safety and Environmental (HS&E) policy, reproduced below.

The policy is endorsed by the Chief Executive Officer of Ithaca (Energy) UK Ltd on behalf of the Board of Directors. The policy acknowledges Ithaca's HS&E responsibilities in relation to its business activities and includes commitments to continual improvement, to assessment and management of the risks and impacts associated with operations, meet legislative requirements and accepted best practice and a willingness to openly communicate these principles to company personnel and the general public. These policies are implemented through the company's Environmental Management System, see below.

### **2.2 Ithaca Environmental Management System**

Ithaca recognises its policy and legal obligations to identify, assess and mitigate environmental risks and actively manage environmental performance of field operations. To achieve this, Ithaca is using the ISO 14001 standard as the model for its environmental management system. In 2006 Ithaca's Environmental Management System was subject to external audit (by ERM CVS) against the ISO 14001 standard for EMS and taking account of the (then) BERR Guidance for the implementation of the OSPAR Recommendation 2003/5. A work programme was initiated to implement the recommendations from the audit, and following further review ERM CVS confirmed that the EMS conformed to the requirements laid out in the guidance.

In 2016, the EMS was subject to subsequent verification against the requirements of the OSPAR 2006/5 DECC Guidance, conducted by ERM Certification and Verification Services who also verified (3<sup>rd</sup> and 4<sup>th</sup> May 2016), that the system met the requirements.

Ithaca has further developed and implemented its EMS in compliance with ISO 14001 to ensure the ongoing effective management of its exploration production and decommissioning activities.

In order to ensure that the commitments of the EMS are fulfilled, responsibilities are assigned for initiating, executing and checking them. Ithaca has access to specialist advice and support on environmental issues. Environmental responsibilities are assigned through line management and specific personnel are assigned objectives, targets and actions relevant to the particular function for which they are responsible.


Project management controls are in place to ensure that: risks to the environment are identified and appropriately prevented, managed and mitigated throughout the project and subsequent operations; environmental considerations are addressed through the contracting process; contractor interfaces with relevance to environmental protection are identified and addressed; all necessary environmental permits are obtained; performance is monitored; improvement opportunities are identified as appropriate; and project close-out actions, such as the submission of data on project completion are implemented.

Ithaca monitor and report on the performance of each operation and compare against the targets and legal compliance standards set for the specific operation and the standards and criteria set by

annual plans. Such monitoring programmes identify any improvements needed, stimulate awareness and provide training.

Mitigation and control actions identified in this assessment and in later planning and assessment will be documented with defined responsibility for implementation in an environmental management plan for the decommissioning programmes.

Figure 2.1 – ITHACA ENERGY (UK) LTD. – HS&E Policy Statement



**HEALTH, SAFETY AND ENVIRONMENTAL POLICY**

ITHACA ENERGY (UK) LTD. is committed to achieving excellence in Health, Safety and Environmental (HS&E) performance across all of our operations. We consider our HS&E performance and the health, safety and security of those who work for, with and alongside us as central to our business success.


ITHACA will comply with applicable legislation and guidance.

In order to meet our commitment ITHACA will:

- Provide the resources necessary to implement this policy and to develop and maintain our HS&E systems.
- Provide effective leadership, training and coaching to sustain and develop workforce HS&E competency and skills and maintain a positive HS&E culture.
- Define clear responsibilities and accountabilities for HS&E issues within the company.
- Communicate our policy, responsibilities and performance to those who work for, with and alongside us.
- Set realistic HS&E objectives and targets and develop action plans to measure these as a contribution towards continual improvement of our HS&E performance.
- Ensure HS&E performance is prominent in the selection of our contractors.
- Assess and manage operations through all stages to minimise risk of harm to people, the environment and facilities.
- Communicate and consult with stakeholders and the public and have regard for their interests when planning activities.
- Ensure that appropriate plans and resources are in place to respond to incidents and emergencies.
- Investigate incidents, implement recommendations to prevent re-occurrence and share lessons learned.

To support our commitment to HS&E performance ITHACA will develop and maintain effective HS&E systems which will be independently verified against relevant ISO and other recognised standards. HS&E systems will be subject to periodic auditing and management review to ensure ongoing compliance and improvement.

This policy applies to all company activities and ITHACA employees, and contractors and other associates engaged in work on our behalf, have a responsibility to comply with it and prevent harm to themselves and others and damage to the environment.



28<sup>th</sup> March 2014

**Les Thomas, CEO ITHACA ENERGY (UK) LTD.**  
**On Behalf of the Board of Directors**

### 2.3 Rig and Vessel Operator Environmental Policies and Systems

A semi-submersible will be used to P and A four production, one water injection and a previously suspended appraisal well. A pipelay and other vessels will also be utilised to remove the subsea (pipelines, cable and umbilical including risers) and associated seabed structures.

Ithaca will review rig and vessel owners' EMSs to assure that these are robust and demonstrate consistency with the ISO 14001 standard. The interfaces with the Ithaca system in respect of the planned decommissioning program's rig and vessel operations will be identified and documented.

### 2.4 Environmental Assessment

Environmental Impact Assessment (EIA) is an integral part of environmental and project management processes and is an iterative process that continues through the various phases of a project. It is a systematic, objective assessment of the environmental effects that the proposed decommissioning project may have on its surrounding environment. Where options present potentially significant effects, these are subject to further investigation and mitigation. Cumulative effects with those of existing activities, transboundary effects and effects on other sea users are also addressed. The EIA for the Athena Decommissioning Programmes is documented in this Environmental Statement which will also be used to fulfill obligations under the *Offshore Petroleum Production and Pipe-lines (Assessment of Environmental Effects) Regulations 1999 (as amended 2007)*.

Specific measures to be taken to mitigate the effects on the environment from the proposed decommissioning activities are outlined in Sections 3, 6 and 7. Environmental objectives and targets for this development are derived from Ithaca's HS&E Policy - see Table 2.1.

Table 2.1 – Athena Field Decommissioning Programmes Environmental Objectives

<b>Issue</b>	<b>Objective</b>
<b>Communication</b>	Identify issues and concerns through consultation with stakeholders.
<b>Field operations</b>	Manage schedule and implement mitigation to reduce risk during seasonally sensitive periods, including well P&A, subsea equipment and pipelines removal.
<b>Biodiversity</b>	Identify environmental sensitivities potentially affected by the project and avoid adverse impacts through location, timing and operational measures.
<b>Spill prevention</b>	Aim to have zero accidental discharge (e.g. oil, chemical) during drilling and bundle commissioning and operations.
<b>Chemical selection</b>	Chemicals to be selected based upon their technical specifications and environmental performance. Avoid chemicals with heavy metal and other warnings and seek alternatives to chemicals which are candidates for substitution.
<b>Produced water</b>	Prevent/Minimise hydrocarbon and chemical discharges associated with produced water.
<b>Waste</b>	Reduce, reuse, and recycle waste. Correct segregation, storage, documentation and handling of all returnable waste. Waste to be minimised, wherever possible, through procurement controls.
<b>Resource and energy efficiency</b>	Drilling P&A phase – optimise rig anchor placement to avoid relocating anchors. Activities will be planned to be executed as efficiently as possible.

## 2.5 Legislation

Ithaca and their contractors are committed to ensuring that activities carried out during the decommissioning programmes are conducted within the criteria set by legislation, and that all operations will be carried out in compliance with required permits and consents. Appendix 2 provides a summary of the legislation relevant to the proposed Athena decommissioning programmes together with a summary of the environmental conditions originally attached to the Block Licence.

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