

Business Support Team
Offshore Petroleum Regulator for Environment & Decommissioning
Department for Business, Energy and Industrial Strategy
AB1 Building Crimon Place
Aberdeen
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By email: BST@beis.gov.uk

1 November 2021

Dear Sir/Madam,

Cambo Field Development – New Information of Relevance for Environmental Impact Assessment – Ref. No. D/4261/2021

Introduction

1. We write to provide further information to the Offshore Petroleum Regulator for Environment and Decommissioning (**OPRED**) regarding the application of Siccar Point Energy E&P Limited (**SPE**) concerning the Cambo Field Development (**Cambo Project**).
2. Since the public consultation period, new analysis of the environmental impact of the Cambo Project has been conducted, the results of which we believe highly relevant for OPRED's ongoing review of SPE's Environmental Statement.
3. A Technical Review of the Environmental Statement of SPE for the Cambo Project commissioned from the Environmental Law Alliance Worldwide Science Team has found that the Environmental Statement fails to adequately assess the impacts on the seabed from the pipeline; that the project could jeopardise hundreds of species during its operations; and that SPE has not accurately assessed potential impacts in the event of an oil spill. Further, it points to a new survey of the Marine Protected Area (**MPA**) that the Cambo Project will impact and recommends that the UK Government should wait for analysis of the survey results to be completed. The findings should inform any assessment of drilling or laying a pipeline in the region.
4. To help ensure OPRED has the most accurate and up-to-date information before reaching its decision, key findings of the Technical Review are summarised below. The full Technical Review has also been attached to this correspondence.

The impacts of the Cambo Project pipeline on the seabed have not been adequately assessed

5. The Technical Review finds that the Environmental Statement of SPE as it stands has not provided an adequate assessment of impacts nor an adequate explanation for how those impacts would be mitigated for the gas-export pipeline construction.
6. There is substantial overlap between the Cambo Project and the Faroe-Shetland Sponge Belt Nature Conservation MPA. The export pipeline cuts straight through the MPA for 34.8km. While the Environmental Statement of SPE claims that the pipeline

will not traverse any significant sponge assemblages, this assessment fails to account for the impacts of laying down the pipeline, the moving currents deep below the water surface that could cause the pipeline to shift, or the fact that myriad benthic species¹ may move into the area once the pipeline is in place and may then be affected by pipeline leaks or spills.

7. In addition to the risk of impacts on specific species, the pipeline placement is likely to affect important habitat features that the MPA is designed to protect, including an area of continental slope that is important for maintaining the health and biodiversity of Scotland's seas.

The Cambo Project puts hundreds of ecologically and commercially valuable species at risk

8. The Technical Review finds that the Cambo Project could jeopardise hundreds of species over several decades through normal operations. These impacts are downplayed by the Environmental Statement of SPE.
9. Species found in the project area, including deep-sea sponge aggregations and ocean quahogs, are classified as Scottish Priority Marine Features (**PMFs**) and included on the OSPAR List of Threatened and/or Declining Species and Habitats. There are also myriad marine mammal species that are PMFs within or in the vicinity of the proposed development, including Atlantic white-sided, white-beaked and Risso's dolphins, and fin, killer, long-finned pilot and sperm whales, as well as multiple species of seabirds.
10. On 17 September 2021 the Joint Nature Conservation Committee (**JNCC**) completed a new survey of the MPA.² The UK Government should wait for this analysis to be completed, as it should be included in any assessment of the impact of SPE's proposed activities. SPE has also commissioned a fisheries study for the area that will be critical to the assessment. Given the presence of commercially significant species in the vicinity, such as haddock, the results of that study should be made public.
11. The Technical Review also points to inconsistencies in the Environmental Statement of SPE on its proposals for the decommissioning phase of the Cambo Project that reveal a lack of adequate planning.

The potentially devastating impacts of an oil spill from the Cambo Project have not been accurately assessed

12. The oil spill modelling conducted by SPE shows that in the event of a spill, oil could reach the coastlines of the Scottish mainland, Shetland Islands, Orkney Islands, Faroe Islands, Norway, and Iceland. It could further harm pelagic and coastal food webs in the surrounding waters, not just of the UK, but of neighbouring countries.
13. The Technical Review finds that SPE makes a number of false claims about the likely impacts of an oil spill, including the toxicity of the oil, and impacts on both pelagic and benthic deep-water species, fish, and marine mammal species. SPE's statements are unreferenced and therefore reviewed against current evidence from the impacts of the Deepwater Horizon oil spill in the Gulf of Mexico in 2010. The Cambo Project includes

¹ These species include: sea fans, sponges, sea anemones, stalked hydroid and faunal turf, sea spiders, starfish, burrowing anemones, burrowing hexacorals, sponges, small soft corals and bryozoans.

² "Farewell from Faroe-Shetland Sponge Belt MPA." 17th September 2021. JNCC Staff James Albrecht. Accessed [11/10/21]: <https://jncc.gov.uk/about-jncc/jncc-blog/tags/1121s>.

some of the deepest wells licensed on the UK continental shelf, with development proposed at depths of 1,050m to 1,100m.

14. Should there be any accident in the 25 years the field is proposed to be in operation, it could prove devastating for many of the invertebrate, fish, marine mammal, and seabird species found in the Cambo Project area.

Conclusion

15. We consider the information provided by this Technical Review to be critical for the proper assessment of the impacts of the proposed Cambo Project. It sheds light on a number of the questions the UK Government is already exploring in its preliminary assessment of the Environmental Statement,³ as well as raising additional concerns.
16. The analysis provides further evidence that consent for the Cambo Project should not be granted.
17. We request that OPRED please provide a response confirming whether or not the information provided in this Technical Review will be included as part of its consideration of the Environmental Statement of SPE, and to set out its justification if not.
18. Please do not hesitate to contact the signatories for further information on anything contained in this correspondence.

Yours sincerely,

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³ See "Request for Further Information", dated 4th August 2021. Accessed [11/10/21]:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1008838/2021.08.04_-_D-4261-2021_-_SPE_-_Cambo_-_REG_12_1_Note_-_Further_Information_Request.pdf

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About the signatories

- Blue Marine Foundation is a non-governmental organisation with a mission to see at least 30% of the world's ocean under effective protection by 2030 and the other 70% managed in a responsible way.
- Fauna & Flora International is a wildlife conservation organisation with a mission to conserve threatened species and ecosystems worldwide.
- Fidra is a Scottish environmental charity working to reduce plastic waste and chemical pollution in our seas, on our beaches and in the wider environment.
- Friends of the Earth Scotland is an environmental campaigning organisation, working for environmental and climate justice and campaigning for the planet and its people.
- Greenpeace is an independent global campaigning network that acts to change attitudes and behaviour, to protect and conserve the environment and to promote peace.

- Marine Conservation Society is a UK charity fighting for a cleaner, better-protected, healthier ocean.
- Ocean Rebellion is a grass roots movement with a mission to halt the drivers of marine biodiversity loss by 2025 as a prelude to repair.
- Oceana is an international organization with a mission of protecting and restoring the world's oceans.
- Royal Society for the Protection of Birds is a UK charity working to secure a healthy environment for birds and all wildlife, helping to create a better world for everyone.
- Scottish Wildlife Trust works with its members, partners and supporters in pursuit of its vision of healthy, resilient ecosystems across Scotland's land and seas.
- Sustainable Inshore Fisheries Trust is a Scottish charity promoting the sustainable management of Scotland's inshore waters so that they provide the maximum long term socio-economic and environmental benefits to all Scotland's coastal communities.
- Surfers Against Sewage is a local grassroots environmental charity dedicated to the protection of oceans, waves, beaches and wildlife.
- Uplift is a not-for-profit initiative with a mission to support and energise the movement for a just and fossil fuel-free UK.
- Whale and Dolphin Conservation is the leading global charity dedicated to the protection of whales and dolphins.
- Wildlife and Countryside Link is an environment and wildlife coalition campaigning to conserve, enhance and access our landscapes, animals, plants, habitats, rivers and seas.
- WWF-UK is independent conservation organisation with a mission to create a world where people and wildlife can thrive together.