

T: +44 (0)300 244 5046

*(Please note, this line is not active during COVID-19)*

E:

[ms.marinelicensing@gov.scot](mailto:ms.marinelicensing@gov.scot)

## Conservation (Natural Habitats, &c.) Regulations 1994 (as amended)

### Application for a licence to disturb or injure marine European protected species (EPS) for one of the following purposes

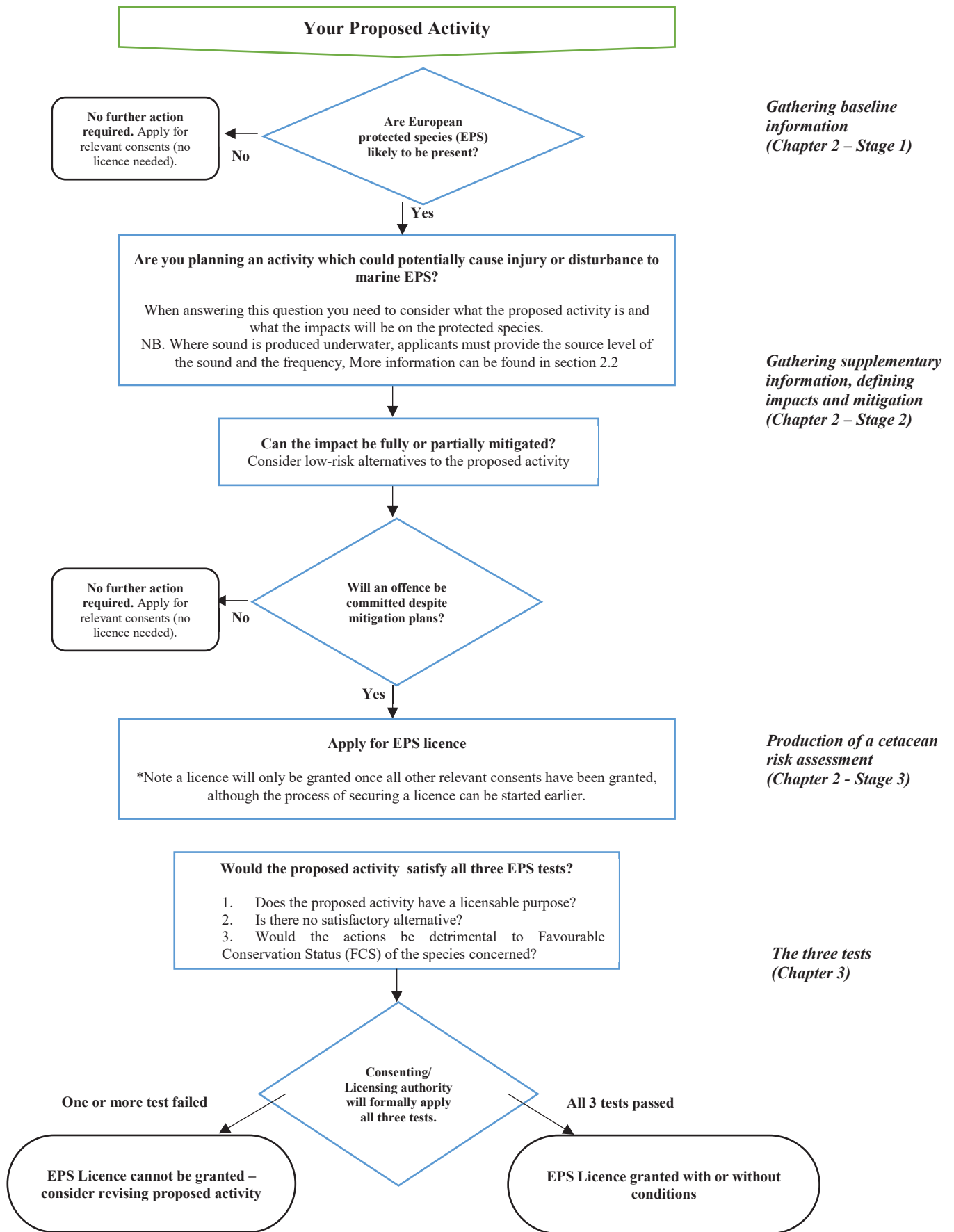
- For preserving public health or public safety
- For an imperative reason of overriding public interest (including those of a social or economic nature and beneficial consequences of primary importance for the environment)
- For preventing the spread of disease
- For preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property, or to fisheries.

Please use this application form if you wish to undertake works/activities that would affect European protected species in the Scottish inshore marine area (0 – 12nm).

**IMPORTANT:** Before completing this form, please read these notes carefully

Applicants are advised to read these notes in conjunction with [The Protection of Marine European Protected Species from injury and disturbance: Guidance for Scottish Inshore Waters](#). If further clarification is needed please contact Marine Scotland Licensing Operations Team (MS-LOT) via email: [ms.marinelicensing@gov.scot](mailto:ms.marinelicensing@gov.scot)

**Flowchart showing the decision-making process**  
Please refer to the relevant chapter of the guidance



*Gathering baseline information (Chapter 2 – Stage 1)*

*Gathering supplementary information, defining impacts and mitigation (Chapter 2 – Stage 2)*

*Production of a cetacean risk assessment (Chapter 2 - Stage 3)*

*The three tests (Chapter 3)*

**Please complete all relevant sections of the form.**

Please ensure that you answer questions fully in order to avoid delays.

The completed application should be sent to Marine Scotland Licensing Operations Team (MS-LOT) at the address below or emailed to [ms.marinelicensing@gov.scot](mailto:ms.marinelicensing@gov.scot).

**We will not process unsigned application forms.**

**Please ensure that you provide appropriate information to support your application.** Applicants can provide this supporting information in the form of an EPS Risk Assessment. Guidance can be found in [The Protection of Marine European Protected Species from injury and disturbance: Guidance for Scottish Inshore Waters](#). Please contact MS-LOT if you wish to discuss the level of supporting documentation required for your application. Failure to provide sufficient supporting information may delay the consultation and licensing process.

MS-LOT will aim to determine whether a licence should be issued **within 6 to 8 weeks of acceptance of a completed application**. However, please note that for large scale or complex projects, the determination period may be longer.

If you experience any problems filling in this form, please contact MS-LOT.

Please use this application form if you wish to undertake works/activities that would affect European protected species in the Scottish marine area (0 – 12nm).

Please note that European protected species are also protected in the offshore marine environment (between 12 and 200 nautical miles). Species in this area are protected under The Conservation of Offshore Marine Habitats and Species Regulations 2017.

Do not use this form if your application relates to scientific, research, conservation or educational purposes. Please contact NatureScot (NatureScot Licensing, Great Glen House, Leachkin Road, Inverness IV3 8NW, Telephone 01463 725000, email [licensing@nature.scot](mailto:licensing@nature.scot) or visit [their website](#)) for a licence application for these purposes. NatureScot also issues licences for the purposes of marking animals or plants in relation to conservation or introducing them to particular areas for conserving natural habitats, and for protecting zoological or botanical collections.

**Before a licence can be granted, it is essential that other relevant licences or consents have been secured for the proposed activity (eg Marine licence).**

**It is the responsibility of the applicant to obtain any other consents or authorisations that may be required.**

**Part A**

**Section 1 Personal details**

Please provide details of the individual, company or partnership you wish to be named on the licence. The licensee is responsible for ensuring compliance with the licence and its conditions. Under the Conservation (Natural Habitats) Regulations 1994 (as amended) it is an offence to fail to comply with the terms and conditions of a licence.

**Section 2 Previous applications**

Please provide details of any previous relevant licences.

**Part B**  
**Section 3**

**Species**

Please provide details of the species that will be affected by the work, the number likely to be affected and a description of how this number was determined. This information can be described in detail in your supporting information. You will need to provide detailed proposals (to be included in the 'Supporting information') of all the mitigation work that you plan to carry out which will affect European protected species.

**Location**

Describe the location of the proposed works. Include a list of the latitude and longitude co-ordinates (WGS84) of the boundary points of the proposed project. WGS84 is the World Geodetic System 1984 and the reference co-ordinate system used for marine licence applications. Co-ordinates taken from GPS equipment should be set to WGS84. Coordinates taken from recent admiralty charts will be on a WGS84 compatible datum. Ordnance survey maps do not use WGS84. In a few cases, (e.g. laying of cables or pipelines) it may only be practicable to supply co-ordinates for the start and end points.

**Example:** For positions read from charts the format should be as in the example: 55°55.555'N 002°22.222'W (WGS84). The decimal point specifies that decimals of minutes are used and the datum is stated explicitly. If seconds are used then the format should be as in the example: 55°55'44"N 2°22'11"W (WGS84).

**It is important that the correct positions, in the correct format, are included with this application, as any errors will result in the application being refused or delayed.**

**Section 4 Consideration of designated sites**

Please provide details of any designated sites affected by your proposals. You are advised to consult NatureScot, or other appropriate regulator, if the work you propose to do affects a Natura site, an MPA or a Site of Special Scientific Interest.

**Section 5 Activities to be licensed**

Please indicate the activities you intend to undertake that would otherwise be unlawful. Provide details of the proposed commencement and completion dates of the activities. **The licence start date will not be backdated, since to commence a project for which a licence has not been obtained may constitute an offence resulting in appropriate legal action.**

**It is the licensee's responsibility to apply for any further licences or an extension prior to the expiry of the initial licence.**

**Section 6 Purpose of the licence application**

Please indicate the purpose of the licence application, the first of the legal tests. **Please complete the relevant Annex to provide justification for the licensing purpose.** This is the [legal basis of the application](#).

**Section 7 Satisfactory alternatives**

Please provide your consideration of why there is no satisfactory alternative. This must include all other options that have been evaluated, the alternative sites that were considered by you and why they were rejected (if no other sites were considered, you must provide the reasons why), as well as all alternative methods of carrying out the work and alternatives dates / timings.

In relation to each alternative considered, please provide an explanation of why you consider it to be satisfactory or unsatisfactory. In respect of any alternative sites please provide the location(s) and details of the alternative site(s), or your views on how the activity/proposal might have been achieved differently, and any other helpful information; e.g., pros and cons of alternative sites, or whether there is likely to be demand for all suitable sites to be used to meet an identified need. Please explain how this conclusion was reached.

## **Section 8 Summary of the planning / licensing position**

Detail all consents and licences required for the proposed project and indicate those that you have applied for or received.

## **Section 9 Noise Monitoring**

Under the Marine Strategy Regulations (2010), there is now a requirement to monitor loud, low to mid frequency (10Hz to 10kHz) impulsive noise. This includes use of seismic airguns, other geophysical surveys (<10kHz), pile driving, explosives and certain acoustic deterrent devices. This monitoring requires completion of a form at the application stage (giving details of the proposed work) as well as completion of a 'close-out' form (giving details of the actual dates and locations where the activities occurred). The close-out form should be returned within 12 weeks of completing the 'noisy' activity or, in the case of prolonged activities such as piling for harbour construction or wind farms, at quarterly intervals or after each phase of foundation installation.

These forms are available at: <https://mnr.jncc.gov.uk/>

## **Part D**

### **Section 10 Declaration and warning**

It is important to read the Declaration and Warning sections before signing the application form.

#### Site visits and compliance checks

It is possible that the licensing authority may undertake a site visit prior to the issue of a licence. The majority of site visits will be arranged several days in advance and will be conducted in the presence of the licensee (or applicant) however there may be occasions when a site visit will be made at short notice.

Licensees should be aware that they may receive a request for a site visit by the licensing authority, or a person authorised by the licensing authority, to assess site conditions against the conditions of the licence. It is essential that if any of the agreed mitigation measures contained in the application and supporting information are changed for any reason, the licensing authority is informed as soon as possible.

The Licensing authority will monitor compliance with licences issued based on the information included in licence reports.

#### Where to seek further information

Further information can be obtained from Licensing Operations Team at the address below.

If your proposal relates to one of the purposes for which NatureScot is the licensing authority, please contact your local office of NatureScot.

Licensing Operations Team  
Marine Scotland  
375 Victoria Road  
Aberdeen  
AB11 9DB

Email: [MS.marinelicensing@gov.scot](mailto:MS.marinelicensing@gov.scot)

Disclaimer

While every effort has been made to ensure the information contained in this document is accurate, nothing in this document should be taken to replace the current legislation in force at this time. You are advised to obtain qualified legal advice in relation to your rights and responsibilities under the 1994 Regulations and other legislation.

**Part A. The Applicant: Personal details**

These questions relate to the person who will be the **named licensee**. The licence can be issued to an individual or a company or a partnership and the licensee will be responsible for ensuring compliance with the licence and the conditions of the licence. Under the Conservation (Natural Habitats) Regulations 1994 (as amended) it is an offence to fail to comply with any condition imposed by a licence.

1. Name of applicant

Title: <Redacted> Forename(s): <Redacted> Surname: <Redacted>

Company Name: GHRYSAOR (UK) BRITANNIA LIMITED (HARBOUR ENERGY)

Business Title (if Appropriate): SENIOR ENVIRONMENTAL ADVISOR

Address: Upper Denburn House  
Kingswells Causeway  
Prime Four Business Park  
Kingswells  
Aberdeen  
AB15 8 PU

Tel no. (inc. dialling code): +44 (0)1224 278 155

Email address: <Redacted>

2. **The Applicant: Previous applications:**

Have you previously held a wildlife licence issued in the UK? (please tick as appropriate)

Yes  No  (If yes, please complete below, if no, please go to Part B)

Who issued the licence? N/A

Licence number (most recent licence) N/A

Year in which the licence was issued. N/A

What species were covered by the licence? N/A

What activity was covered by the licence e.g. disturb, injure? N/A

**Part B. The Application**

**3. Species**

(a) Please indicate which species is / are affected by the proposed works.

Common name(s): Harbour porpoise;  
Bottlenose dolphin;  
Minke whale;  
White-beaked dolphin

Scientific name(s) Phocoena phocoena;  
Tursiops truncatus;  
Balaenoptera acutorostrata;  
Lagenorhynchus albirostris

(b) How many individual animals will be affected by licensed work?

Injury: zero  
Disturbance: <1 individual of any EPS species will be disturbed by survey operations.  
  
Any incidental disturbance will be temporary, short-term and transient in nature.  
  
Please refer to Section 3 of Xodus Reference Document A-304174-S00-A-REPT-001 PL1270 Nearshore Survey EPS Licence Application EPS and Protected Sites & Species Risk Assessment for more information.

Please provide a description of how this number was calculated / estimated

There is no realistic potential for injury and very limited (<1 individual) potential for disturbance to cetaceans in the vicinity of the cable survey activities.  
  
Predicted numbers of animals to be injured and disturbed have been estimated through sound propagation modelling, based on source levels of exemplar geophysical survey equipment (e.g. sub-bottom profiler, ultra-short baseline transponder, side scan sonar) and using the Xodus Group Ltd "Xposure" sound propagation model.  
  
Please refer to Section 3 of Xodus Reference Document: A-304174-S00-A-REPT-001 "PL1270 Nearshore Survey EPS Licence Application EPS and Protected Sites & Species Risk Assessment" for more information.

(c) **Location of proposed licensed action**

Latitude and Longitude co-ordinates (WGS84) defining the extent of the project. Please continue on a separate sheet if necessary.

LATITUDE								LONGITUDE								
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W
		°			.		'N				°			.		'W



- (d) Provide a brief description of the proposed activity and the methods to be used.  
Detailed information should be included in your Supporting Information  
**Please provide details of the source levels and frequencies of underwater noise if relevant**

The survey activities are scheduled to be undertaken between 1 June 2024 and 31 May 2025 and will comprise a single survey. Whilst this is a period of 365 days, the survey activities are expected to take approximately seven days to complete.

Further information on the activity schedule is provided in Section 2.2.4 of the PL1270 Nearshore Survey EPS Licence Application EPS and Protected Sites & Species Risk Assessment (Xodus Reference Document A-304174-S00-A-REPT-001).

The nearshore extent of the PL1270 pipeline to be surveyed is located off St Fergus, Aberdeenshire. The total area covered by the survey is approximately 5.3 km<sup>2</sup>. The proposed geophysical survey activities will allow Chrysaor (UK) Britannia Limited (Harbour Energy) to carry out asset integrity/management assessment, to ensure the assets are in good working order; and to identify potential faults and help shape future engineering strategy.

Chrysaor (UK) Britannia Limited (Harbour Energy) is applying for an EPS Licence in recognition of the fact that, while unlikely, it is not possible to eliminate the risk of disturbance to these species through interactions with the vessels and survey equipment required to conduct the geophysical surveys.

See Section 2 of the Xodus Reference Document: A-304174-S00-A-REPT-001

- (e) Briefly state how you will minimise the impact of your proposed work on European protected species.  
Detailed information should be included in your Supporting Information.

All vessels will adhere to the provisions of the Scottish Marine Wildlife Watching Code (NatureScot 2017), and marine mammal monitoring will be conducted as follows:

- There will be MMO coverage for the SBP survey activities with the potential to affect EPS, with adequately trained and experienced MMO(s) working standard 12 hour shifts. They will have prior experience of working at sea.
- Marine Mammal Observer (MMO); During daylight hours the MMO(s) will carry out visual observations to monitor for the presence of cetaceans before the start of SBP activities, and will delay the commencement of the operations should any cetaceans be detected within the 500 m mitigation zone.
- Pre-start search; Visual (MMO) monitoring will be conducted for a pre-start search of 30 minutes (i.e. prior to the commencement of SBP survey operations with the potential to affect EPS).
- Mitigation zone; Should any cetaceans be detected within 500 m of the vessel, prior to the commencement of SBP surveys with the potential to affect EPS (or after breaks in geophysical survey activity of more than 10 minutes), operations will be delayed until their passage, or the transit of the vessel, results in the cetaceans being more than 500 m away from the vessel.
- Reporting; During survey campaigns involving SBP operations, all recordings of cetaceans will be made using JNCC Standard Forms. At the end of the operations, a monitoring report detailing the features of interest recorded, methods used to detect them and details of any problems encountered will be submitted to Marine Scotland and NatureScot

See Section 5 of the Xodus Document Reference: A-304174-S00-A-REPT-001 for more information.

#### 4. Consideration of designated sites

Designated Areas: National Nature Reserves (NNR), Sites of Specific Scientific Interest (SSSI), Special Protection Area (SPA), Special Areas of Conservation (SAC), Ramsar sites, Marine Protected Areas (MPA). Information on designated sites is available on NatureScot website <https://sitelink.nature.scot/home> or from your local NatureScot office.

- (a) Will any part of the proposed activity fall within /or adjacent to an area covered by a designated site eg SSSI, SAC, MPA? Yes  No
- (b) Please give the name of the designated site(s) and either the outcome of your consultations or the reason why you have not consulted (see note 4). Please enclose any relevant correspondence.

Southern Trench NCMPA overlaps with the proposed survey area.

Chrysaor (UK) Britannia Limited recognises there is a potential for the proposed survey activities to result in adverse impacts on the qualifying and interest features associated with this site. However, the assessment found that there is no potential for adverse effects (i.e. injury or disturbance; other than insignificant) to the qualifying features of the Southern Trench NCMPA, hence, the conservation objectives of the protected site will not be compromised.

See Section 4 in Xodus Document Reference: A-304174-S00-A-REPT-001 for more information.

**5. Activities to be Licenced**

**Proposed Methods**

(a) Please complete all relevant columns in the table below to indicate the methods you propose to use, the activity involved and the time period in which you propose to use each method. This information will be used when preparing the licence to cover activities that would otherwise be unlawful, and failure to give full details may result in an inappropriate licence being issued.

Activity to be licensed (please tick)					Method to be used, (e.g. piling)	Time period	
Capture	Kill (exceptional circumstances only)	Injure	Transport	Disturb/ Harass		From	To
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>USBL</b>	01.06.2024	31.05.2025
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>SBP</b>	01.06.2024	31.05.2025
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>SSS</b>	01.06.2024	31.05.2025
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>			

**6. Purposes of the licence application (tick one box only)**

A licence can only be issued if 3 specific legal tests are met. The section below relates to the first of these tests. The options shown are taken from the **Conservation (Natural Habitats, &c.) Regulations 1994 (as amended)**.

Please indicate which purpose relates to the proposed works

(a) Preserving public health or public safety (we will require evidence that there is a risk to public health or public safety e.g. an imminent risk of flooding) Regulation 44(2)(e)

**Complete Annex A**

(b) Imperative reasons of overriding public interest (including those of a social or economic nature and beneficial consequences of primary importance for the environment) Regulation 44(2)(e)

**Complete Annex B**

(c) Preventing the spread of disease Regulation 44(2)(f)

**Complete Annex C**

(d) Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property, or to fisheries Regulation 44(2)(g).

**Complete Annex D**

(e) If you wish to use acoustic deterrent devices to protect fish farm sites in Scottish waters, you must also complete Annex E.

**Complete Annex E**

**7. Satisfactory alternatives**

This relates to the second of the legal tests which must be satisfied. Please explain why there is no satisfactory alternative to carrying out the proposed work affecting the species. You must describe all possible alternatives which were considered and why they were considered unsuitable. You must also consider the option of not undertaking the work. **It is not acceptable to state that ‘there is no alternative’.** Please continue on a separate sheet if necessary.

Chrysaor (UK) Britannia Limited (Harbour Energy) has a statutory duty to provide an economic and efficient system for the distribution of natural gas and to ensure that its assets are maintained to ensure a safe, secure and reliable supply to customers.

Chrysaor (UK) Britannia Limited (Harbour Energy) have the responsibility to provide and maintain the gas export infrastructure in this region. This infrastructure includes the PL1270 gas export pipeline linking the Britannia oil and gas field with the mainland. Maintenance of this export pipeline involves routine and unplanned inspection, maintenance and surveys to ensure the integrity, reliability and effective function of the export pipeline.

Hypothetical alternatives include the use of human divers or underwater camera systems to monitor this pipeline. However, neither of these are a satisfactory or plausible alternative which allows for the range of functions served by geophysical survey methods, and neither could adequately facilitate or inform the need for any repair or replacement of pipeline elements.

Given the geographic location and length of the export pipeline, and the requirements of the surveys, there are no feasible alternatives to the use of acoustic (geophysical) survey methods, operated from vessels, to ensure the integrity of the pipeline and identify any sections that may require replacement, repair or decommissioning.

This EPS licence will cover the survey of the nearshore (<12 NM) extents of the PL1270 pipeline for the works described in detail in the associated EPS and Protected Sites and Species risk assessment. If works other than those assessed in the associated EPS and Protected Sites and Species Risk Assessment are proposed then this will be subject to separate Marine Licensing as/when required, with specific alternatives discussed thoroughly at planning stage.

**8. Other Licences / Consents**

Please detail below all licences / consents you have applied for or received. **Before a licence can be granted, it is essential that other relevant licences or consents have been secured for the proposed activity (eg Marine licence).**

Type of Licence / Consent (e.g. Marine Licence, Local Planning Authority, Local Works Licence)	Date Applied for	Reference no.	Date of issue of licence / consent
N/A	N/A	N/A	N/A

## 9. Noise Monitoring

Please indicate if any of the following noise generating activities will be taking place during the operations:

- |   |                                     |
|---|-------------------------------------|
| Use of explosives                                     | <input type="checkbox"/>            |
| Piling  | <input type="checkbox"/>            |
| Use of Acoustic Deterrent Devices                     | <input type="checkbox"/>            |
| Survey equipment operating in the range 10 Hz – 10kHz | <input checked="" type="checkbox"/> |

If you have ticked any of the above boxes please complete a Proposed Activity form in the Marine Noise Registry at: <https://mnr.jncc.gov.uk/>.

**Please note the form must only be completed once for each activity. If you have already completed a form for this activity (eg through the marine licensing process) please give details.**

CHRYSAOR (UK) BRITANNIA LIMITED (HARBOUR ENERGY)

**EPS licence applications will not be accepted until this form has been completed and submitted.**

**Have you remembered to enclose Supporting Information with your application, as described in the accompanying guidance? Please check**

- |   |                                     |
|---|-------------------------------------|
| <b>Completed Application form</b>                   | <input checked="" type="checkbox"/> |
| <b>Completed Annex</b>                              | <input checked="" type="checkbox"/> |
| <b>Map / Chart</b>                                  | <input checked="" type="checkbox"/> |
| <b>Correct co-ordinates</b>                         | <input checked="" type="checkbox"/> |
| <b>Additional information / EPS risk assessment</b> | <input checked="" type="checkbox"/> |

## Part C. Declarations

10. I have read and understand the guidance provided in this application form. I declare that the particulars given are correct to the best of my knowledge and belief, and I apply for a licence in accordance with these particulars.

I authorise employees or representatives of the Scottish Ministers to enter the site which is subject to this application for the purpose of monitoring and inspecting the permitted works.

### Warning

Under the Conservation (Natural Habitats, &c.) Regulations 1994 (as amended) it is an offence to fail to comply with the conditions imposed by a licence. The licensee is responsible for ensuring compliance with the licence.

The Scottish Ministers can modify or revoke a licence at any time, provided there are good reasons. Any licence that may be issued is likely to be revoked immediately if it is discovered that false information was provided and resulted in the issue of a licence.

Under the Conservation (Natural Habitats, &c.) Regulations 1994, any person who in order to obtain a licence knowingly or recklessly makes a statement or representation, or furnishes a document or information which is false in a material particular, shall be guilty of an offence and may be liable to criminal prosecution. Any person found guilty of such offences is liable on summary conviction to imprisonment for a term not exceeding six months or to a fine not exceeding level 5 on the standard scale, or to both imprisonment and a fine.

**Note:** Previous convictions for wildlife offences will be taken into account and in some cases may mean that the Scottish Ministers do not consider it appropriate to grant a licence.

Signature of the  
Applicant

<Redacted>

Date 20/05/2024

(The person named at part 1)

Name in BLOCK  
LETTERS

<Redacted> (on behalf of Chrysaor (UK) Britannia Limited)

Note – If signing on behalf of a company, please append your signature with “on behalf of *Company Name*”.

**The completed application should be signed and sent to Marine Scotland Licensing Operations Team (MS-LOT) at the address below or emailed to [MS.Marinelicensing@gov.scot](mailto:MS.Marinelicensing@gov.scot)**

**Please remember to include all supporting information.**

Licensing Operations Team  
Marine Scotland  
EPS Division  
375 Victoria Road  
Aberdeen  
AB11 9DB

### Disclaimer

While every effort has been made to ensure the information contained in this document is accurate, nothing in this document should be taken to replace the current legislation in force at this time. You are advised to obtain qualified legal advice in relation to your rights and responsibilities under the 1994 Regulations and other legislation.

Marine Laboratory, 375 Victoria Road,  
Aberdeen AB11 9DB  
Version 3.0 October 2020



**Annex A**

**Only to be completed if you selected *for Preserving public health or public safety* in Question 6 of the application form**

**Please complete all questions**

Give details of the risk to public health or safety

How has the risk been identified. Please give details of any expert advice received.

How will the proposed activity address the identified risk

## Annex B

**Only to be completed if you selected for *Imperative reasons of overriding public interest (including those of a social or economic nature and beneficial consequences of primary importance for the environment)* in Question 6 of the application form**

### **Please complete all questions**

What benefits will be provided by the proposed activity? Give details and indicate if they are social, economic or environmental. Please indicate if the benefits are short or long term.

Gas is considered to be an essential commodity for energy production for communities, with the export pipeline detailed in Section 1.1 of Xodus Reference Document A304174-S00-REPT-001 Nearshore Survey EPS Licence Application EPS and Protected Sites & Species Risk Assessment, exporting gas for the distribution to commercial and domestic customers, providing a long term economic and social benefit to UK. Therefore, the monitoring of submarine gas export pipeline constitutes work of overriding public need.

What public interest will be served? Who will benefit from the proposed activity? Does the proposed activity address a need?

The pipeline survey activities will enable stable gas supplies (i.e. energy security) to domestic and commercial customers across the United Kingdom which will benefit social and economic aspects.

Why is it imperative the proposed activity goes ahead?

Should the work not proceed, the reliability of gas supply to domestic and commercial customers across the United Kingdom may become compromised and not be as reliable.

Does the proposed activity support any local regional or national policies? Please give details. Are you fulfilling a statutory role?

Chrysaor (UK) Britannia Limited holds a licence under the Gas Act 1995 for the distribution of gas from the Britannia oil and gas field.

Harbour Energy Plc ( the parent company of Chrysaor (UK) Britannia Limited) therefore has a statutory duty to provide an economic and efficient system for the distribution of gas and to ensure that its assets are maintained to ensure a safe, secure and reliable supply to customers.

**Annex C**

Only to be completed if you selected for *Preventing the spread of disease* in Question 6 of the application form

**Please complete all questions**

What disease(s) is / are at risk of being spread if the proposed activity does not go ahead? Please give details of any expert advice received.

How will the proposed activity prevent the spread of disease? Please give details of any expert advice received.



**Annex D**

**Only to be completed if you selected for *Preventing serious damage to livestock, foodstuffs for livestock, crops, vegetables, fruit, growing timber or any other form of property, or to fisheries* in Question 6 of the application form.**

**Please complete all questions**

What serious damage has occurred or will occur if the proposed activity does not go ahead. Please give details of any expert advice received.

How will the proposed activity prevent serious damage? Please give details of any expert advice received.

## Annex E

Only to be completed if you intend to operate ADDs at marine fish farm sites in Scotland

Please complete a copy of this annex for each individual site included on your application

Please complete all questions

Site name and ID (FS number)

### Device Type 1

#### *Device Details*

Device name (and version if relevant)

Number of devices proposed

Source level of device (rms and SPLpeak)

Typical frequency content

**Please give details of the proposed duty cycle (or available settings) including the system duty cycle**

**Duration of use of device (e.g. hours per 24 hour period)**

**Time of use (e.g particular time of day or time of year)**

**If multiple devices of this type are to be used, please give details of numbers to be deployed and locations in relation to the site.**

## **Management of ADD Use**

**Please give details of the cues/triggers and the decision process to activate ADDs. These cues / triggers should be specific and measurable and should relate to predation events by seals rather than presence of seals in the area.**

**Give details of how ADD use is to be reviewed**

**Give details of criteria for deactivation or removal of ADDs (including if they appear to be ineffective)**

**Give details of ADD deployment plans and any relevant planning conditions relating to ADD use**

**Device type 2**

***Device details***

**Device name (and version if relevant)**

**Number of devices proposed**

**Source level of device (rms and SPLpeak)**

**Typical frequency content**

**How is the device triggered (please state if the device operates constantly or if there is no triggering method)**

**Please give details of the proposed duty cycle (or available settings) including the system duty cycle**

**Duration of use of device (e.g. hours per 24 hour period)**

**Time of use (e.g particular time of day or time of year)**

**If multiple devices of this type are to be used, please give details of numbers to be deployed and locations in relation to the site.**

***Management of ADD Use***

**Please give details of the cues/triggers and the decision process to activate ADDs. These cues / triggers should be specific and measurable and should relate to predation events by seals rather than presence of seals in the area.**

**Give details of how ADD use is to be reviewed**

**Give details of criteria for deactivation or removal of ADDs (including if they appear to be ineffective)**



Give details of ADD deployment plans and any relevant planning conditions relating to ADD use

**Device type 3**

***Device Details***

**Device name (and version if relevant)**

**Number of devices proposed**

**Source level of device (rms and SPLpeak)**

**Typical frequency content**

**How is the device triggered (please state if the device operates constantly or if there is no triggering method)**

**Please give details of the proposed duty cycle (or available settings) including the system duty cycle**

**Duration of use of device (e.g. hours per 24 hour period)**

**Time of use (e.g particular time of day or time of year)**

If multiple devices of this type are to be used, please give details of numbers to be deployed and locations in relation to the site.

***Management of ADD Use***

Please give details of the cues/triggers and the decision process to activate ADDs. These cues / triggers should be specific and measurable and should relate to predation events by seals rather than presence of seals in the area.

**Give details of how ADD use is to be reviewed**

**Give details of criteria for deactivation or removal of ADDs (including if they appear to be ineffective)**

**Give details of ADD deployment plans and any relevant planning conditions relating to ADD use**

***Please use additional sheets for further device types***