EXECUTIVE COUNCIL

PUBLIC

Title:	Report on the public consultation for the Environmental Impact Statement for the Sea Lion Field Northern Development Plan
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Report Author:	Deputy Director of Natural Resources
Portfolio Holder:	MLA Barkman
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Reason for Redactions:

Under Executive Council Standing Order 23(2), Executive Council must have regard to the categories of exempt information in Schedule 3 to the Committees (Public Access) Ordinance when determining if information should be withheld

The categories which are potentially relevant to this paper are:

- 3 – International relations and relations with the United Kingdom and other Overseas Territories
- 4 – Economic interests
- 13 – Information about contemplated action

Previous papers:	118-24P: Consultation on Environmental Impact Statement submitted by Navitas Petroleum Development and Production Limited for the Sea Lion Field in Licence Blocks PL004 and PL032 (North Falkland Basin).
List of documents:	Appendix A – Responses to representations by Navitas Appendix B – Responses to representations by FIG

1. Recommendations

Honourable Members are recommended to advise the Governor to:

(a) Note that a statutory public consultation exercise has been completed for the Environmental Impact Statement (EIS) for the Sea Lion Northern Development Area Phase 1 and 2 development to drill for and produce offshore hydrocarbons as required by the Offshore Minerals Ordinance 1994 (as amended) ('the Ordinance').

(b) Note the representations made and additional information requested, and the responses by Navitas and FIG, as set out in the appendices.

(c) Agree that the additional information provided by Navitas in response to the consultation does not give grounds for a further period of public consultation.

(d) Note that Navitas have committed to making several amendments to the EIS as a result of the representations made and republishing the EIS in line with guidance.

(e) Note that some matters remain outstanding, and that if FIG is not satisfied with the responses to these matters, DMR will recommend conditioning consent for the development to resolve said matters, pursuant to Section 64C(3) of the Ordinance.

(f) Agree that, subject to the proposed amendments being made and the potential application of conditions, the EIS process satisfies 64C(1) of the Ordinance.

(g) Note that acceptance of these points does not confer permission on the operator to develop the field, since this is covered by other parts of the offshore hydrocarbons legislation, and this should be clearly understood by the public.

2. Additional budgetary implications

2.1 None

3. Executive summary

3.1 Navitas Petroleum Development and Production Limited ('Navitas') is progressing plans to develop the Sea Lion Northern Development Area Phase 1 and 2 involving the drilling for, and production of, hydrocarbons within petroleum licence areas PL032 and PL004b relating to reservoirs identified as SL10, SL20 and Casper. In order to do this, the company must submit and gain approval for a development programme that is described in the Field Development Plan ('FDP') document as set out in the Offshore Petroleum (Licensing) Regulations 2000.

3.2 The Offshore Minerals Ordinance 1994 (the 'Ordinance') requires that, before making an application for permission to drill a regulated well or for the granting of a relevant consent (such as for development of a field described in an FDP) that might result in the environment being significantly affected an environmental impact assessment and Environmental Impact Statement ('EIS') are required. The EIS must comply with Section

64C of the Ordinance before an application for such proposals can be approved including undergoing a statutory period of public consultation.

3.3 Similar proposals were previously consulted on in 2018 and 2020 (papers 180/18 and 52/20). Since 2020 the project has undergone a number of optimisations, resulting in a requirement for a new EIS. ExCo agreed in June 2024 (paper 118/24) to allow the public consultation on an EIS to take place for phases 1 and 2 of the Sea Lion Northern Development Area. This was advertised by Gazette Notice as required and a 42-day consultation exercise ran from 2 July 2024 to 13 August 2024.

3.4 A total of 30 representations were made during the public consultation, while the Department of Mineral Resources ('DMR') submitted comments arising from its review of the EIS and those carried out by expert consultants. In line with the requirement to provide a response to representations within 28 days, Navitas submitted responses to the public consultation representations to DMR on 10 September.

3.5 The responses were reviewed by DMR and clarification was sought on some of the responses. Following an iterative process a final set of responses was provided, which are set out in Appendix A. Around half of the responses involve Navitas committing to make an amendment to the EIS and producing a revised version. Most of the remaining comments were deemed acceptable by DMR at this stage of the project. In some cases, while the EIS contains an acceptable level of information or forecast, further information will be expected at a later stage when more detailed design work has been carried out. There were also some representations that were primarily aimed at FIG, to which DMR have provided a response, as set out in Appendix B. For a small number of responses, DMR did not deem Navitas' response acceptable and the matter remains outstanding. If these are not resolved to DMR's satisfaction, conditions may be applied to any consent that may be granted for the development pursuant to Section 64C(3) of the Ordinance.

3.6 Subject to the updates being made in line with the commitments made by Navitas for the second category of responses and outstanding matters being addressed through conditions under Section 64C(3) of the Ordinance at the consent stage, DMR advises Executive Council that the EIS process satisfies the requirements of the Ordinance. This view was reached taking into account thorough reviews of the document by external specialists.

3.7 The acceptance of the recommendations in this paper does not imply that consent to develop the field will be granted in future. Instead, the satisfactory conduct of the EIS process, and the issues, impact, mitigations and risks that are set out, along with any conditions recommended, will be important considerations in any such future decision.

4. Background [and Links to Islands Plan and Directorate Business Plan/s]

4.1 The Islands Plan (2022–2026) states that "This Assembly will… progress extractive industries in an environmentally conscious way." The Hydrocarbon Development Policy Statement (158/13) states that "Development of the hydrocarbons industry must ensure the protection and conservation of the Falkland Islands' environment and biodiversity". Other environmental and biodiversity policies are relevant, along with managing biosecurity risks and developing plans to address climate change noted in the Falkland Islands Environment Strategy 2021-2040 amongst other documents. Certain international

agreements to which have been applied to the Falkland Islands are also relevant, such as the United Nations Framework Convention on Climate Change, the Convention on Biological Diversity, the United Nations Convention on the Law of the Sea.

4.2 The Sea Lion field was first discovered by Rockhopper Exploration via exploration drilling in 2010. Further subsequent wells and seismic analysis increased confidence in its potential for commercial development. In 2012 Premier Oil Exploration and Production Ltd (Premier) took a majority stake in the licences and further drilling, seismic data acquisition and analysis work took place leading to development proposals being drawn up. In 2018 and again in 2020 an EIS for development proposals for Sea Lion similar to the current ones, involving the same reservoirs as currently proposed, underwent public consultation. In each case, the operator responded to the representations and provided further information. On each occasion, the EIS along with Premier's responses and proposed amendments was accepted by ExCo (papers 180/18 and 52/20 respectively). Amended versions of the EIS were then published in each case.

4.3 In 2022 Premier's interests were acquired by Navitas Petroleum Ltd. Currently, Navitas Petroleum Development and Production Limited ('Navitas') has 65% working interest in the production licences PL004b and PL032 (those relevant to the Sea Lion Northern Development Area Phase 1 and 2). The remaining 35% working interest is owned by Rockhopper Exploration (Hydrocarbons) Ltd, Rockhopper Exploration (Oil) Ltd and Desire Petroleum Ltd. Navitas is the appointed Operator under the licensing regulations as such is entitled to represent the licensees jointly in this circumstance.

4.4 Although the current project being proposed by Navitas is similar to the one previously consulted on by Premier, there are substantial differences. The current proposals have a longer field life, fewer but more productive wells, a different subsea layout and a smaller production vessel (Floating Production Storage and Offloading vessel, or FPSO). As a result, the project and its impacts described in the 2018 and 2020 EISs are sufficiently different to the current proposals that an exemption from the EIS requirements under Section 67A of the Ordinance does not apply, therefore a new EIS was required for the current project.

4.5 The decommissioning phase is described in outline in the EIS but will be subject to a standalone EIS when a decommissioning programme is called for under Section 48 of the Ordinance. The EIS sets out the base case for decommissioning which is that wells will be plugged to accepted standards and all structures will be removed from the field and sea bed.

5. EIS consultation process

5.1 The manner in which an EIS must be consulted upon is addressed by Section 65 of the Ordinance. This section states that a consultation process begins whenever an EIS in accordance with Section 64C(1)(b) has been delivered to the Governor and the Governor agrees the date for consultation to start.

5.2 The Department of Mineral Resources received an EIS dated 11 March 2024 and undertook a legislative compliance review against Schedule 4 to the Ordinance, as well as commissioning an external compliance review by independent experts the Scottish Association for Marine Science Enterprise Ltd (SAMS). The reviews confirmed the EIS

as being compliant. During this time, some updates were made to the EIS and a report was made to ExCo recommending that the updated EIS be allowed to proceed to public consultation (paper 118-24) and ExCo accepted the recommendation.

5.3 A period of public consultation began on 24 June 2024, advertised in the required manner including by notice in the Falkland Islands Gazette Volume 133 No. 8. Following this, Navitas requested that an update be made to the EIS to include consideration of end-use emissions from the use of extracted hydrocarbons. After taking advice, DMR agreed to this update and allowed the consultation to be restarted on 2 July 2024. No representations or enquiries on the original EIS had been received at this time.

5.4 The public consultation commenced on Tuesday 2 July 2024 as advertised in the Falkland Islands Gazette Volume 133 No. 10 and corresponding radio advertisement per the requirements of the Ordinance. Additionally, web pages were hosted by DMR and Navitas allowing the EIS and Non-Technical Summary to be easily downloaded. Representations were invited via email or written form. Paper copies of the EIS and Non-Technical Summary (NTS) were made available at the required locations. Both were also made available at additional locations, including Navitas' offices, as well as in digital format on USB stick.

5.5 During the 42-day public consultation, Navitas and DMR provided digital and hard copies of the full EIS and NTS without charge to any member of the public. Navitas undertook a series of public presentations and meetings with local organisations regarding the EIS and ensured weekly announcements in the Penguin News and daily announcements on Falkland Islands Radio Service were undertaken as required. Representations received by DMR were forwarded to Navitas as soon as they were received. The questions and comments requiring response from the representations are given in Appendix A.

5.6 In addition to the public consultation, the EIS was reviewed from a technical perspective by DMR and four expert consultants. Under Section 66 of the Ordinance DMR is able to submit requests for further information to the applicant. This process was used to request responses to queries made by DMR and the expert consultants commissioned to review the EIS.

5.7 The statutory 42-day public consultation period ended on Tuesday 13 August 2024. A total of 30 responses were received; 14 from members of the public, 12 from organisations or companies and four from FIG departments other than DMR.

5.8 Navitas had 28 days to respond to the comments made in the representations in line with Section 65 of the Ordinance. These were provided on 10 September and are set out in Appendix A. These were reviewed by DMR and this resulted in a request for further information under Section 66 of the Ordinance.

5.9 Navitas has now submitted a final set of responses to the representations from the public consultation and comments from DMR submitted under section 66 of the Ordinance. These are set out in Appendix A.

6. Commissioned reviews of the EIS

6.1 As set out in paragraph 5.6, the EIS was subject to reviews by DMR and expert consultants: the UK regulator OPRED; SAMS; Xodus Group (whose review focussed on the emissions section) **REDACTED**

6.2 SAMS **REDACTED** provided an overarching conclusion on the EIS. Although OPRED provided comments on individual sections, it did not provide an overall view on the EIS. Xodus were employed to review a specific section and were therefore unable to provide an overall view on the EIS.

6.3 SAMS noted that "*Overall, Navitas should be commended for the comprehensive nature of their EIS…. The document is well structured and it is clear that Navitas have made a strong and clear effort to submit an EIS that attempts to adhere to Best Practice for such assessments. Any assumptions made during assessments are clearly indicated, and where gaps in data are acknowledged, appropriate uncertainty surrounding impacts was assigned and the precautionary principal followed.*"

6.4 SAMS provided comments (which were passed to Navitas under Section 66) on the deficiencies for the sections on designated sites and regional air quality. Navitas' responses were shared with SAMS, who were satisfied with the response on designated sites and noted that if Navitas would commit to making certain amendments, the response on regional air quality would be satisfactory.

6.5 **REDACTED**.

7. Analysis of responses and outstanding matters

7.1 Around half of the responses resulted in Navitas committing to make an amendment to the EIS and producing a revised version in line with the Hydrocarbons Environmental Impact Assessment Guidance Note. DMR will check that these amendments have been made when the revised EIS is issued, and if the updates are made as expected, no further action will be required. For most of the remainder, Navitas' response was deemed adequate and no further action is required, or Navitas' response was deemed adequate at this stage of the development process, but further information will be required at a later stage (for example at detailed design).

7.2 There were around 30 representations that were primarily aimed at FIG rather than Navitas (for example, concerning the legislative framework for hydrocarbons). DMR have provided responses to these representations, as set out in Appendix B.

7.3 For a small number of comments, Navitas' response was not deemed satisfactory. Section 64C(3) of the Ordinance allows the Governor to impose conditions on a subsequent development consent to reduce, eliminate, remedy, and offset significant effects. Further dialogue will take place with Navitas on outstanding issues, but if Navitas' position is still deemed unsatisfactory, DMR will recommend imposing conditions at the point at which consent for development is considered.

7.4 **REDACTED**

7.5 **REDACTED**

7.6 **REDACTED**

7.7 Most of the impacts or risks that remain as 'significant' are carried forward into the Environmental Monitoring and Management Plan (EMMP, EIS Chapter 15), which will be absorbed into the Environment Plan under planned new legislation. Those that are not in the EMMP are either significant oil spill risks which are properly managed under the OPEPs and legislation covering major accidents, or they are impacts on public amenities which will be managed via different processes.

8. Supporting documents

8.1 The Hydrocarbons Environmental Impact Assessment Guidance Note refers to additional documents that provide supporting information to the EIS and help to avoid double regulation. The documents relevant to the project at this stage of its progress are Oil Pollution Emergency Plans (OPEPs; three documents for Offshore, Inshore and Onshore respectively), a Financial Liability Assessment (of oil spill risks) and Waste Management documentation. Navitas have provided these documents to DMR for comment.

8.2 Review of the documents by DMR, other FIG Departments and external agencies is in process. The documents provided are similar to documents accompanying previous iterations of the project. Comments are being made to Navitas and it is expected that the comments will be responded to and the documents will be updated where necessary.

8.3 The acceptance of these documents is not necessary for the EIS process but they are requested alongside the EIS since they inform the mitigation measures set out, especially for low probability major oil spill scenarios.

8.4 The Governor's approval is necessary for OPEPs separately to the EIA process and once comments have been addressed and these have been finalised they will be brought to ExCo for consideration.

9. Resource implications

9.1 Financial implications

None.

9.2 Human resource implications

None.

10. Legal implications

10.1 Section 64 of the Ordinance provides that EIA and EIS are required either for an application to drill a regulated well in controlled waters or for a relevant consent where impacts are considered to be significant.

10.2 In the context of the Sea Lion Development, the approval of a development programme under the Offshore Petroleum (Licensing) Regulations 2000 is considered a 'relevant consent'. The development programme is set out in the Field Development Plan (FDP)

which has several supporting documents. The FDP sets out how the licensee proposes to extract the hydrocarbons within a certain field and covers a number of disciplines relating to the project, including: engineering, geology, commercial, and fiscal considerations (though those disciplines may be subject to distinct statutory approvals in their own right). The FDP is the vehicle through which the Government ensures that a given oil field will be developed in a manner that safeguards the interests of the Falkland Islands (by ensuring that the proposed development meets FIG policies for offshore mineral production), and that it is done safely and according to good oilfield practice. An FDP can only be approved if it is preceded by an EIS for the programme therein. The FDP may then be approved, potentially with conditions attached, including conditions relating to the EIS.

10.3 In relation to the EIS, three key requirements must have been satisfied:

- The applicant must have carried out an assessment of the likely impacts on the environment of the activities of the relevant project;
- The applicant must have delivered to the Governor an environmental impact statement that contains (at least) the information detailed by Schedule 4 to the Ordinance (ExCo paper 11-18); and
- The applicant must have consulted upon that that statement in accordance with the Ordinance (Appendix A).

10.4 Section 64C(3) grants powers to the Governor to impose conditions on a given application regarding significant adverse environmental effects; to eliminate, reduce, if possible remedy, or offset them. In deciding whether to impose such conditions, the Governor must take into account four matters, namely:

- The EIS itself
- Any review carried out by technical experts on FIG's behalf
- Public representations (and their consequent responses)
- Any additional information or evidence requested by the Governor.

10.5 Certain developments in association with the project will require planning and or building consent under the Planning Ordinance 1991 and associated legislation. Those approvals will be processed in accordance with that legislation and are not considered in detail in this EIS paper.

10.6 New environmental legislation involving the drafting of an Offshore Petroleum Safety and Environment Bill to replace the Safety and Environmental provisions of the Offshore Minerals Ordinance is substantially complete. It will introduce a goal-setting regulatory regime, integrating an initial EIA with a subsequent "Environment Plan" to control operational impacts using the tests of 'As Low As Reasonably Practicable' (ALARP) and Acceptable Level. It will also bring in review and reporting processes to ensure that performance standards laid out in the Environment Plan are met. There will be new regulatory enforcement powers, powers for investigations and inspections, and OPEP provisions will be absorbed into the legislation and updated. Liability provisions for unplanned pollution and for environmental damage will be updated. The objectives of the new legislation were agreed via ExCo papers 128/18 and 177/18.

10.7 There will be a transitional period for operators to comply with the new legislation, to be confirmed. The main difference will be preparing and approving the "Environmental Plan", which would set out performance standards for the control of the environmental

impacts of operations, together with associated performance outcomes, monitoring and reporting requirements, implementation plan and environmental management system (EMS) and verification arrangements. The Environmental Monitoring and Management Plan currently represented by Chapter 15 of the EIS will form the basis for an Environmental Plan.

10.8 Proposals for new wildlife, conservation and biodiversity legislation are being progressed including stronger provisions for protected areas, led by the Environment Department. The EIS considers impacts on relevant habitats and species using available data within existing legislation and with reference to good practice including UK analogues. Dialogue between DMR, the Environment Department and respective legal advisers will be progressed to ensure provisions and interfaces are understood and any implications to any party are highlighted at an early stage.

11. Environmental & Sustainability Implications

11.1 The EIS, and this paper, are important documents that could frame future decisions with significant environmental and sustainability implications. The EIS recognises that this offshore hydrocarbons project will have significant impacts and present significant risks. It is essential therefore that the control measures are correspondingly strong and that there is confidence in mitigations.

11.2 The EIS process recognises the importance of public participation in decision-making that has environmental implications. Publication of a revised version of the EIS that includes the representations made is not a legal requirement but is adopted policy and considered good practice and this is expected to contribute positively to any future decision-making involving such environment matters.

11.3 The project will be the largest single source of greenhouse gas emissions in the Falkland Islands and will contribute significantly to shipping and aviation emissions. Policy work on developing a long-term emissions development strategy is already implicit in the commitments in the Islands Plan 2022-2026 and the Environment Plan 2021-2040 and this is crucial to identifying how these emissions will affect existing commitments and how they might be included in projections along with emissions reduction measures across the Islands.

11.4 Independent experts have noted that the Falkland Islands has substantial potential for carbon offsetting. Experts who have worked on the UK's Peatland Code scheme have made initial estimates that an offsetting scheme that restored 25% of eroded tussac and 5% of grazed inland bog could generate offsets in the same order of magnitude as emissions from the proposed project.[1] Other offset opportunities such as kelp appear to have similar scales of potential,[2] and while there have been scientific studies and reports, these options are less developed.

11.5 For formal offsetting schemes to emerge, ongoing research needs to continue for some time to establish the scientific base to ensure the uncertainties are tolerable; also the

[1] Evans *et al.* (2020) A Scoping Study For Potential Community-Based Carbon Offsetting Schemes In The Falkland Islands

[2] Bayley *et al.* (2021) Valuation of kelp forest ecosystem services in the Falkland Islands: A case study integrating blue carbon sequestration potential.

logistical and administrative needs must be explored. Nevertheless, there are some clear opportunities for ecological land improvement to combat climate change impacts, and pilot schemes should be encouraged which can precede a formal scheme, as happened in the development of the UK Peatland Code. Given that emissions from any hydrocarbon projects would be significant relative to other sectors, the continuing development of policy, science, fieldwork and practical trials in this area should be encouraged.

11.6 Land-based offsetting can be largely harmonious with the objectives of the emerging agricultural Land Recovery Programme and Biodiversity Framework and Action Plans. It is important that offsetting is additional to any improvements that would happen under these programmes, yet the contribution of offsetting could accelerate and amplify the goals of these programmes in many situations.

11.7 However, there remains a risk that the local offsetting capacity is insufficient to meet the needs of the project. If local offsetting is not possible, the policy allows for offsetting overseas.

12. Significant risks

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12.1 There is a risk that a major change to the project may occur, such as additional wells being required or an FPSO being selected that is significantly different to the analogous one cited in the EIS, or that a response to a representation provided by Navitas and accepted at this stage proves to be incorrect when practically tested. Either scenario could mean that impacts are substantially different or significantly greater than described in the EIS. Under current legislation, such a change would mean that the EIS would no longer be considered appropriate for the project and a new one would need to be produced, which would require a consultation in the same format.

13. Communication and publicity

13.1 The decision regarding the EIS will be made public following consideration by Executive Council. It is also anticipated that following inclusion of the additional information, the revised post-approval EIS will be made available on the DMR website.

Appendix A: Responses to representations by Navitas

Part I: Representations made during the public consultation

Reference	Representation	Navitas response
BYR 1	We welcome the recently released Environmental Impact Statement by Navitas Petroleum, and we wish to submit the following statements. We all use oil in our everyday life. It is widely stated that oil will be part of the energy mix during the Energy Transition for at least the next 30 years, or longer. Therefore, oil needs to be produced. It should be produced to high environmental standards. It is hypocritical to use oil but rule out the production of it in the Falklands on environmental grounds, whilst believing it should be produced by other countries, often to lower environmental and other standards. • The EIS is a substantial, thorough and very detailed assessment of the impact of the Sea Lion development, impacts and mitigation measures.	Thank you for the comments.
BYR 2	• FIG Policy. The EIS of the Sea Lion development is in accordance with the Islands Plan 2022–2026, that states "This Assembly will… progress extractive industries in an environmentally conscious way." The EIA recognises other relevant FIG policies including those to protect the environment and biodiversity, and climate change.	Noted and agreed.
BYR 3	• Further work. The EIS recognises further work to be done in legislation & offsetting. This is understandable given that O&G is a new industry to the Falklands. These additional provisions can be pragmatically put in place as the project develops.	Navitas continues to work with FIG and its key contractors to ensure that its arrangements are aligned with industry best practice and FIG's planned changes to legislation. Navitas' offsetting approach is being confirmed with FIG and will be consistent with FIG legislation, policy and guidance.
BYR 4	• The EIS appears to cover all environmental risk areas. • The Sea Lion development has Environmental Risks. The EIS does not indicate there are specific, significant, negative environmental impacts. It	Thank you for your comments. In response to the second bullet, Navitas agree that the majority of the impacts and risks identified and assessed throughout the document are not considered significant (i.e. are not Moderate or above). However, the EIS does highlight a number of impacts

Reference	Representation	Navitas response
	appears there are environmental risks, if accidental events take place but not definite impacts. • Measures to reduce significant adverse effects on the environment. • The O&G sector is treated differently to other Falklands business sectors. The Falklands O&G industry has had to undertake an EIA. No other Falklands industry has had to do so. Neither fishing nor tourism (flights) is being asked to do this i.e. the EIS (Chapter 10) assesses the risks of birds landing on ships. The Sea Lion development will only have a handful of modern ships in the EEZ, but including an attending offshore emergency response vessel, and other vessels maintaining modern state of the art features. The fishing industry often has a substantial number >100 vessels, some of which, jiggers and reefer vessels that intentionally utilise a lot of light to conduct fishing operations. There is a real danger of inconsistent standards being applied to the Falklands O&G sector, not applied to other sectors.	and risks as potentially significant, e.g. the impact of direct emissions (assessed as Moderate), the risk of impacts from the introduction of terrestrial invasives (assessed as Upper Moderate). Mitigation measures are identified where possible to reduce these significant impacts and risks to ALARP but some remain significant due to the precautionary approach taken in the assessment.
BYR 5	• Oil Pollution Emergency Plans. - Oil Pollution Emergency Plans are based on credible worst-case scenarios (EIS chapters 12.1, 12.2, 12.3). This approach seems appropriate. The likely location of spill, weather, environmental receptors and type of oil are all factors considered. The likelihood of oil beaching in the Falklands is low. - This level of risk is acceptable and compares with existing tanker operations both in Falklands harbours and offshore. Current offshore tanker and bunker operations appear to have fewer mitigating measures being taken and the risk of these appear to be unevaluated by FIG and conservation groups.	Thank you. These comments are noted and are a welcome observation.
BYR 6	• Waste. The use of the planned FIG incinerator to treat and dispose of the majority of project wastes, with non-combustible wastes being returned to the UK for disposal, should mean there is little environmental risk from O&G waste in the Falklands; this compares favourably with the current arrangements for other waste in the Falklands.	Thank you for your comment.

Reference	Representation	Navitas response
BYR 7	• Offsetting /GHG. - All Green House Gases (GHG) generated from undertaking the development and production should be offset, ideally by offsetting measures within the Falklands. It is recognised that these measures have yet to be fully identified. This is understandable given that O&G is a new industry and little is known about the science and offsetting potential in the Falklands. - The emissions produced by actually using the oil, should be offset by the actual users of the oil that produce the emissions, not the producer i.e.. Navitas. This is consistent with FIG's User Pays Policy. - The EIS proposes that Navitas provides an environmental fund. This is a welcome and positive development and if properly managed will provide an opportunity to address a number of Falkland environmental issues including: biodiversity, habitat reinstatement, land restoration and endangered species protection,	Thank you for the comment. Navitas' Carbon and Biodiversity offsetting fund will be established and intends to pursue the Falkland islands environmental opportunities the comment mentions.
BYR 8	• No residual impacts or risks in the EIS were considered to be 'High' (Chapter 16). This is highly reassuring for the Falklands and contrasts with the production and developments in other countries. • The majority of the residual impacts and risks associated (Chapter 16) with Phases 1 & 2 of the Sea Lion Development were considered to be of 'Low' or 'Very Low' significance. This is acceptable. It is important that these will be periodically reviewed to ensure that proper controls remain in place. • Significant impacts & risks of planned activities & unplanned events. There are just thirteen aspects of significance, rated as 'Moderate'. • A number of the 'Moderate' risks relate to marine activities: - Artificial light - risk of bird-strikes (Section 10.1); - Vessel noise offshore - impacts to marine mammals (Section 10.4); - Emissions – GHG (Section 10.9); - Collisions between vessels and marine mammals inshore and offshore (Section 10.11),	See BYR 4 above. There are some impacts and risks that remain significant i.e. (Moderate or above) but no residual impacts and risks remain high owing to the implementation of project specific mitigation measures. Navitas welcome these comments and the context they provide.

Reference	Representation	Navitas response
	- Marine invasive species - risk of introducing marine non-native species (Section 10.12). There is a far greater risk of these impacts and risks from planned and unplanned events in the fishing industry, (or from transiting ocean traffic), which has far more vessels entering and operating within the Falklands EEZ.	
BYR 9	• Mitigation. Whilst it is noted that Navitas are planning on using industry standard mitigation measures, it is important that these are effectively monitored by FIG, including using KPIs.	There are extensive statutory monitoring and reporting requirements associated with industry standard mitigation measures. In addition the operations EMMP will detail monitoring and reporting requirements. EMMP outcomes will be reported to the EMMP governance and advisory committee and published. In alignment with Navitas' contracts and procurement procedure, contractors will also be expected to report performance against KPIs.
BYR 10	• The 'Moderate' rating for the onshore activities seems too high: - Waste management (contingent export to UK with unrecoverable waste going to UK landfill) – if the materials come from the UK and can be returned to the UK for disposal in accordance with UK standards, surely this is a high enough environmental standard. The Falklands, with its limited resources and capability cannot expect higher standards than the UK. - Competition for freshwater resources – the freshwater requirement is mainly during the drilling phase. This requirement is not huge in comparison with the overall requirement. FIG should ensure it has the water capacity to be able to deal with this. - Competition for energy resources – the onshore energy use is not that significant to overall grid requirement and FIG already has plans to increase capacity with the increased wind farm and new power station - Competition for use of roads – O&G activity will mainly focus on the Gordon Lines area. The increase in traffic is not huge on lightly used roads with lots of capacity. - Disturbance to the human population from light – residents in Stanley already have light pollution from FIPASS and Port William, and	Thank you for the comment. The EIS deliberately takes a precautionary approach to ensure all impacts and risks are assessed appropriately and with consideration for the human population as receptors. This is particularly true when it comes to onshore activities. Navitas do not propose to make any change to the document in light of the comment.

Reference	Representation	Navitas response
	Berkeley Sound activities; Oriental jiggers in close proximity to Stanley are the worst light pollution offenders. The development phase is relatively short period and there will not be a major increase in the number of vessels, following first oil. We thank you for the opportunity to comment, and wish the project a successful delivery	
BYR2 1	A response to 57-page Falklands Conservation submission to the Navitas Petroleum EIS.	As this is a response from one consultee to another, the body of the letter is not included here and will be added as an Appendix to the EIA.
CoC 1	The Falkland Islands Chamber of Commerce welcomes the first steps towards potential oil production in the Sea Lion field by Navitas Petroleum Development and Production Limited; and their presentation of the recently released Environmental Impact Statement (EIS) It is encouraging to note that Navitas have considered critical issues of (a) waste management, (b) freshwater supply, (c) energy supply, (d) affected Stanley road networks, (e) air travel and support, and (f) accommodation within the EIS submission. These areas also have an impact on existing businesses, and non-oil and gas vessel berthing operations. Oil exploration has been progressing for about 30 years with the Falkland Islands Government (FIG) having a strategic vision of oil production to secure the economy of the Falkland Islands. Within the next few years there is a strong possibility that this vision will be realised; and oil will start to be produced offshore in the Falkland Islands, reducing the current heavy reliance of revenue from the fishing industry, and enabling the creation of a Patrimony Fund which will secure the Falklands economy for the long term. FIG have set out an agenda to reduce carbon emissions and introduce more green energy, such as phase 3 of the Sand Bay wind farm. However, as the world transitions to green energy there will still be a reliance on oil for the next few decades. Navitas, during their presentation of the EIS, stated that new methods of oil extraction will be utilised therefore reducing the level of emissions to the atmosphere. It was explained that these emissions, at the worst-case	Noted, Navitas welcome the comments and looks forward to continuing to work with the Chamber of Commerce, and in relation to the Socio-Economic Impact Assessment in particular.

Reference	Representation	Navitas response
	scenario, would be lower than the pro-rata emissions from oil production within the UK. This is an encouraging statement as the Falkland Islands enjoys a unique environment and continues to work towards reducing carbon emissions further. FIG requires Navitas to operate a fund to 'offset' carbon emissions from the Sea Lion development. This fund will be open to all applicants who have investment proposals that they can demonstrate reduce greenhouse gasses, contribute to carbon storage, or are otherwise environmentally friendly, including land restoration and bio-diversity protection. FIG and Navitas are seeking to ensure the safest operations, as far as is reasonably practicable, for offshore oil production. These endeavours will ensure the lowest possible risks and impacts, as set out in the EIS, for all areas of our community and the environment. In the view of the Chamber of Commerce, the list of impacts appears comprehensive and the mitigations appropriate to the risk. FIG has an opportunity to shape the future of the Falkland Islands by introducing an industry that will bolster the economy and help deliver sustainable national development. Falkland Islands businesses will have the opportunity to grow to meet the requirements of Navitas and future FIG capital projects. This growth in local businesses will provide further economic stability to the Falkland Islands through more viable business units and sectors, improved opportunities for diversification and generation of corporate taxes to fund social programmes. The Falkland Islands Chamber of Commerce eagerly awaits the Navitas Socio-Economic Impact Statement and looks forward to engaging with aspects of the Field Development Plan. These documents will help to determine how to deliver best possible private sector support for the project whilst recognising wider national development opportunities and benefits.	
DGN 1	We understand that the plan is to anchor LTVs in Berkeley Sound during the construction phase and that there will be a 500m exclusion zone around these. While we haven't had a season comparable to that in 2015 we would seek assurance from Navitas that there won't be any impact on transhipping operations in Berkeley Sound, if we were to have a season with huge catches.	Navitas shall work closely with FIMA throughout the planning and execution stages of the development to ensure that: - final positions for the LTV anchorage sites are agreed and well communicated to mariners and other users of the sea - Activity Specific Operating Guidelines (ASOGs) are developed for the vessels operating in the area

Reference	Representation	Navitas response
		- FIMA is advised of all vessels planning to operate in the area - FIMA is advised of the activities and equipment / product transferred between vessels. The LTVs (and 500m radius exclusion zones around both vessels) will take up 1.349% of the area of Berkeley Sound so are not considered to pose a significant impact to other users of the area. This will be referenced in the post consultation EIS in Section 5.5.1 & Section 11.2
DGN 2	The Illex fishery has changed substantially over the last few years and local companies are more invested in the fishery having built strong relationships with overseas partners. It's no longer a fishery where the financial arrangement is a 'brokers' fee or 'fishing licences are sold' to overseas partners. The potential loss to the local economy if negatively impacted by the oil industry is significant.	FIG requires Navitas to submit a separate 'Financial Liability for Oil Spill Assessment' for review and approval. This assesses the worst case financial impact arising from an oil spill event and includes an assessment of the financial impact of such a spill on the Falkland Islands fishing industry. Navitas is required to demonstrate that it has insurance arrangements in place to compensate for such impacts in the unlikely event of an oil spill.
DGN 3	While we appreciate that historically there may not have been a great deal of fishing in the area there is nothing to say that this may not change in the future. Therefore we suggest a stronger commitment to decommissioning and leaving the seabed clear is important.	As stated in the EIS, 'Decommissioning will be carried out in accordance with the legislation in place at the time'. At the time of writing, the project defers to the current UK legislation and its sources. OSPAR Decision 98/3 on the Disposal of Disused Offshore Installations prohibits dumping, and leaving wholly or partly in place, of disused offshore installations within the OSPAR maritime area. While derogation from this prohibition may be sought for qualifying installations, e.g. large steel or concrete footings of fixed platforms, this will not apply to the proposed project which will utilise an FPSO with subsea wellheads and infrastructure. Under OSPAR, all subsea structures must be removed with any associated piles, well conductors etc. cut to a level below the natural seabed which ensures they remain below the seabed in the face of prevailing conditions. Of importance, pipelines and other structures which are listed in a UK Pipeline Works Authorisation are excluded from OSPAR Decision 98/3 and in the UK, decommissioning of these is managed in line with the Petroleum Act 1998 (Part IV) and the Pipeline Safety Regulations 1996.

Reference	Representation	Navitas response
		These require a similar assumption of complete removal where reuse of the pipeline and associated structures for further hydrocarbon development is not possible. However, under the UK regulations, there are certain pipelines and/or circumstances in which a pipeline may be wholly or partially left in situ e.g. pipelines that are adequately buried or trenched and are not subject to development of spans, and are expected to remain so. However, the decision to do so would need to be informed by an EIS which is supported by a formal Comparative Assessment of the options which must include a robust assessment of the environmental impact of removal vs. that of leaving wholly or partially in situ. Part V of the Offshore Minerals Ordinance 1994 confers obligations for decommissioning. A decommissioning programme has to be approved by FIG in advance. FIG has powers under the Ordinance to develop additional regulations in relation to field decommissioning. As stated in Section 5.12 of the EIS: '…in line with the current legislation, the Phase 1 & 2 Development infrastructure has been designed to enable complete removal of all structures. Equally, the flowlines will be surface laid and will not be trenched or buried thus facilitating complete removal (noting that the seabed is very soft, so flowlines may self-bury which could change the methods required for complete removal).' Also in line with legislation, all relevant 'As Left' surveys will be carried out to ensure that the seabed is left clear. The Sea Lion Phase 1 and 2 offshore installation and subsea infrastructure has been designed so that it can be removed completely and the seabed left clear. Therefore the project has been designed with compliance to current regulation in mind and Navitas will comply with the prevailing legislation at the time of decommissioning.
DGN 4	The table on Page 1154 does capture the potential severity of blow-out/loss of FPSO to some degree. The EIS goes to some length to show that oil reaching coast of FI is very unlikely however, we believe that the likely overlap between a major oil spill and the Illex fishery/Illex distribution is much greater and that more could be done to model that and define impacts.	Navitas has submitted a separate 'Financial Liability for Oil Spill Assessment' for review and approval by FIG. This assesses the worst case financial impact arising from an oil spill event and includes an assessment of the financial impact of such a spill on the FI fishing industry. Navitas is required to demonstrate that it has insurance arrangements in place to compensate for such impacts in the unlikely event of an oil spill.

Reference	Representation	Navitas response
		Navitas has also analysed AIS data and it is clear that the Illex fleet fish on the shelf break and sometimes report either their midday or midnight positions in the relevant grid square XFAK but do not fish in there. The AIS data corroborates the VMS data. The general direction of the oil in a modelled blow out scenario will generally head in a N / NW direction. The oil is also buoyant and will float on the surface away from Ilex biomass generally. Navitas's financial liability assessment recognises that even if there were no, or very a limited or short-lived biological impact on FI fish species, reputational impacts would extend to depress demand and/or prices, even in unaffected areas. These marketing impacts are considered when determining the potential liability and associated insurance arrangement required in order to provide compensation.
ED 1	Page 37: Previous surveys - would be good to state how many previous surveys have been undertaken	A list of surveys will be developed and included as an appendix.
ED 2	Page 40: Have there been any more unusual influxes of marine mammals reported, or a general change in behaviour since 2017?	2017 was unprecedented compared to previous years and abundances have been similar since. Note that 2017 was also the year that FC and SAERI started surveys and a point in time when empirical data collection started. It is acknowledged that whale populations have increased over time since the cessation of whaling. However, it is not possible to determine whether abundances were similar prior to the commencement of the BEST Sei whale project that commenced in 2017. The post consultation EIS will be updated for clarity.
ED 3	Page 45: Titles not complete on table	Noted. This will be amended.
ED 4	Page 48: regular monitoring and reporting on performance of offsetting initiatives - what are the timescales?	The governance and timescales for reporting against offsetting initiatives will be agreed with FIG. The establishment, implementation and continued development of the Carbon and Biodiversity Offsetting Fund shall be aligned to key milestones within the Sea Lion development Phase 1 and 2 schedule. Once operations are underway, it is proposed that monitoring will be at 6 month intervals and that performance will be reviewed twice a year with an annual report to be provided to the public.
ED 5	Page 52-53: Would discharge of drilling muds at seabed impact on levels of microplastics in the water surrounding the site? No mention of micro-	Drilling muds do not contain plastics/microplastics. There are no plastics in the circulation fluids for gravel packing. The circulation fluid is water

Reference	Representation	Navitas response
	plastics in EIS, drilling chemicals have been found to contain micro-plastics and a be contributor to ocean micro-plastic pollution. This may have cumulative impact on receptors such marine species also. Can this pollution be avoided? Possible to monitor in e.g. discharges?	based, which has a gelling agent to increase its viscosity, to improve the ability to transport the proppant into the wellbore. The gelling agent is normally a polysaccharide, such as xanthan, which is a common food additive. The proppant is not used during the drilling phase of the well. The proppant is placed in the well during the completion phase of the well, which acts as a filter medium during the production of the well. The proppant is inert ceramic with no plastics.
ED 6	Page 53: Is Marine Flora not disturbed by discharge of drilling mud and cuttings? Table 1.7 mentions Marine Flora is affected by thermal discharge	This section refers to phytoplankton, Navitas are unclear what the query refers to as there is no marine flora (e.g. seaweeds) at the location bar marine growth which will grow on the installation. A footnote will be added to the post consultation EIS for clarity.
ED 7	Page 65: At least 9 extra supporting plans area needed, a long list of them appears (incl. oil pollution management plan, bird strike management plan, EMMP). When will all of these be ready?	Navitas are following the regulations and guidance provided by FIG in relation to the timing for submission of supporting plans. Alongside this, Permits Licences, Notifications and Consents (PLANC) registers are being developed in consultation with FIG DMR, to track the submissions (including the supporting plans mentioned) and the timeframe for their submission in step with the project execution timeline.
ED 8	Page 118: Are 3m significant wave heights typical for all seasons of weather at Sea Lion? Other studies of the South Atlantic would suggest 3m is average wave height in the South Atlantic with significant waves as 5m.	There will be clear operating limits for connection and offtake. The wave study information gathered for the Sea Lion Project was location specific, the data came from several Metocean data collection exercises conducted to assist in the selection for design and operation of the FPSO. The studies supported the decision that direct offloading to conventional trading tankers was both a viable option and one that could be done safely. Note that connection, offloading and disconnection for direct offloading will only commence, and continue, if the sea state and wind conditions are within the allowable operating parameters, if not then connection will not commence and during operations if conditions reach the operating limits offloading it will be stopped and the operation made safe.
ED 9	Page 123: How were the financial and environmental costs/considerations for e.g. marine life, seabed, water etc of a drilled	Without a Thermomechanical Cuttings Cleaner (TCC) the proposed batch drilling strategy would require a disposal well at each drill centre location.

Reference	Representation	Navitas response
	disposal well versus processing using thermo-mechanical cuttings (TCC) unit and disposal at site considered against each other?	The TCC minimises environmental impact and represents the Best Practical Environmental Option and is used internationally.
ED 10	Page 123: Water injected into wells is seawater- will this be tested prior to injection for e.g. small organisms? What volume of water is considered too much of an unknown impact on the organism?	Seawater is treated with chlorine and also filtered once brought onboard the FPSO. This water then passes into the injection system where it has further filtration and also the oxygen is removed. Water specification is maintained and is monitored automatically and also through laboratory testing. Additionally periodic culture tests will be carried out to check for bacterial / organism growth. The injected water goes into the reservoir not the surrounding environment.
ED 11	Page 146: Do drilling muds and cuttings contain plastics? Can these be cleaned?	See ED 5.
ED 12	Page 147: Use of TCU in the table but is not used anywhere else, consistency in abbreviations needs to be used	Noted. This will be amended.
ED 13	Page 150: Good to see that "chemicals will be selected to minimise environmental impacts as much as possible, in compliance with legislation". Is this UK legislation? Will the environmental considerations go beyond legislation when choosing chemicals?	Yes. Chemicals will be selected in compliance with all UK legislation and every effort will be made to ensure the selection of those with minimal environmental impact. Text will be added to Section 5.4.6 to refer to Sections 10.6 and 10.7 which provide more detail on the legislation with which the project will comply. All chemicals selected will be listed on the Offshore Chemical Notification Scheme (OCNS) List of Notified and Ranked Product generated by CEFAS (Link).
ED 14	Page 150: Drilling chemicals being discharged at sea - what are the volumes/frequency?	As stated in Section 5.9.1.1 details on the specific operational chemicals which will be used during the Phase 1 & 2 Development are not yet known, and neither are the actual volumes of individual chemicals over and above the anticipated mud volumes indicated in Section 10.6. Nonetheless, all operational chemicals used during the Development will be selected to minimise environmental impacts as much as possible. Further detail on the UK legislation which will be adhered to is provided in Sections 10.6.1.1 and 10.7.1.1. All chemicals selected will be listed on the Offshore Chemical Notification Scheme (OCNS) List of Notified and Ranked Product generated by CEFAS (Link).
ED 15	Page 167: Open drains will be routed to marine systems - will meet MARPOL 73/78 annex requirements prior to discharge to sea- how will this be regulated and checked?	The open drains system is not pressurised. It can receive hydrocarbons and it separates. However, the open drains system cannot go overboard. It is still contained. What goes in is open, what goes out is enclosed - will

Reference	Representation	Navitas response
		either go to closed drains system or slops tank for further treatment. Any discharges overboard must meet MARPOL requirements.
ED 16	Page 186: Although well workovers are not planned, and if one is considered an EIA will be carried out and discussion with FIG, this still holds a potential increase for environmental impacts?	If well workovers are required, the requirement for an additional EIA will be discussed with FIG at that time.
ED 17	Page 195: Number of vessels travelling back and forth is not fully known yet- this will have an effect on emissions data and should be logged and monitored.	The projections included in the emissions chapter are very precautionary - as such it is currently anticipated that the emissions arising for the actual number of vessel movements during operations will be within the emissions envelope that has been estimated. Emissions will be recorded and reported as a matter of course.
ED 18	Page 201: How will the desalination plant at the FPSO be powered?	All power on the FPSO comes from the electrical distribution system which in turn comes from the main power generated by the Gas Turbine Generators. The desalination system is powered from here. Back up periodic power is supplied by the Essential Diesel Power Generators for the occasions when main power is offline. Power feeds the main electrical board and distributed accordingly to all electrical users onboard the FPSO.
ED 19	Page 203: Temporary modular accommodation units initially provided by Navitas, supplemented by local hotels. Transferring to in- transit accommodation as soon as available. Where will this be? Is land for this already designated?	An EOI was issued in the Penguin News in February 2024 for the development's accommodation requirements. Once the project is sanctioned an RFQ can be issued to the respondees which will provide further information on the development's short, medium and long term accommodation needs. This will include a 'hotel'. A number of companies and individuals responded to the February EOI. Navitas has not designated any land for the accommodation requirements this is expected to be covered during the responses to the accommodation RFQ.
ED 20	Page 209: Will decommissioning involve any species studies prior to removal of all subsea infrastructure to check if there are any potential disturbances to ecosystems that should be carefully managed?	Decommissioning will be covered under a separate and dedicated decommissioning EIS which will be supported by baseline surveys prior to work commencing to ensure that any sensitivities are appropriately managed. 'As left' surveys will be undertaken upon completion of decommissioning activities to ensure the site is left as it is found. Decommissioning activities will be compliant with legislative requirements in place at the time of decommissioning. See also DGN 3.

Reference	Representation	Navitas response
ED 21	Page 209: Could be important to know general environmental risks associated with decommissioning - i.e. high risk to decommissioning may influence whether structures should be put in in the first place.	Navitas is required to ensure that all structures are designed to be fully decommissioned in a safe and environmentally responsible manner. The seabed has been extensively surveyed to explore environmental sensitivities. These have not indicated that the structures will cause adverse environmental impact. Location specific site surveys will be undertaken immediately prior to installation to ensure there are no localised environmental sensitivities that suggest installation is inadvisable at that location. Navitas will add this additional commentary to Section 5.12 of the post consultation EIS. See also DGN 3.
ED 22	Page 218: Stakeholders: There is reference to the FIG Policy Unit. Please update the names: Directorate of Policy, Economy and Corporate Services, with Environment Department, and Policy Department, as required.	These names were correct at the time of the original scoping exercises. They will be updated to the current names with footnotes to explain.
ED 23	Page 246: Area wide environmental baseline survey of Sea Lion field in 2012- is there a more recent study?	Rockhopper conducted the area wide survey in 2012. Shortly after, Premier conducted a survey south at Isobel Deep in 2014. In 2015, Premier also carried out investigations at 2 gas well sites adjacent to the Main Drill Centre. These studies examined benthic habitats and sediment and water quality, among other things and will not likely have changed since that time. See Table 7.1, and Figures 7-4 and 7-5.
ED 24	Page 251: The environmental baseline survey of Berkeley Sound occurred between June and August 2015 - does this survey need to be repeated to capture all the different life cycles, seasons and organisms that may be impacted within that habitat?	This is not considered necessary due to the small time frame and level of activities taking place in Berkeley Sound (two vessels moored for non-consecutive 13 month period).
ED 25	Page 252: Four seasonal coastal bird surveys in and around Berkeley Sound were carried out between 2016 to 2019. Do you consider this to be adequate information to form a baseline for birds at that site?	Yes, Navitas does consider this adequate information to form a baseline, not least because of the small time frame and level of activities taking place in Berkeley Sound (two vessels moored for a non-consecutive 13 month period).
ED 26	Page 253: Were the data gaps of offshore benthic ecosystems, oceanography in relation to oil spill modelling, seabirds with regard to priority species and movements, marine mammals, populations add breeding activities identified before or after the GAP Project?	These gaps were identified after the GAP project.
ED 27	Page 253: In regards to the Key Gaps of relevance to the Sea Lion EIA, it is not stated if these have been addressed or are still key gaps; if these	It is important to note that under FIG's guidance the applicant should not be accountable for data gaps that could not reasonably have been filled,

Reference	Representation	Navitas response
	are still gaps remaining requiring information, how will this information be obtained, and by whom?	but more for the way in which they are addressed in risk assessment. The presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained. The key data gaps will be covered in the EMMP. At the time of project sanction, this will be discussed further with FIG. The EMMP chapter will be updated in the post consultation EIS to ensure that all of the EMMP workshop conclusions and outline tables are included. Navitas will also update Section 7.2.4 to make it clear which data gaps remain and to more specifically state those which have been filled since the inception of the Sea Lion.
ED 28	Page general: General concern about lack of references to the data sources, references would allow the data and conclusions derived from data to be checked and assessed by us/ by other stakeholders.	Navitas request further detail on which sections contain unreferenced data. Navitas has committed to preparing a table of primary data sources. This will be added as an appendix to the post consultation EIS, and reports will be provided on request. Note that during the public consultation Navitas provided any reports and data that were requested.
ED 29	Page general: Would be good to have a table as an annex with all studies used/ surveys conducted including the dates. As well as an annex of all data gaps identified and if they are going to be further looked into.	Noted. A table will be compiled and appended to the EIS.
ED 30	Page 262: Water column characteristics were measured for 1 month in March and April 2012. Do you consider that a one-month survey over 10 years ago that doesn't take into consideration seasonality or the changes that may have occurred since then, is acceptable for forming a baseline?	This section is referring to the portion of the survey aimed at characterising the general water column structure e.g. characterisation of layers, presence of thermoclines, and vertical mixing. The respondent is correct that such characteristics may vary seasonally, but seasonal variability will not be so great that it requires special consideration with respect to the potential impacts or mitigations described in relation to the drilling programme. In other words, the water column characterised at the time will be indicative of the present situation, and seasonal variability is not likely to have a strong modifying effect relative to impacts. The measurement is therefore believed to be acceptable for a baseline; however, the text within the EIS will be updated for clarity.
ED 31	Page 263: Reference to 1982 study, then references that dynamics of water masses in an area can change over time- is this study still most	Please see ED 30 above. The text will be modified to say Navitas is referring to variability and not infer that there is a one-way change over

Reference	Representation	Navitas response
	relevant considering the time elapsed since the study and potential changes in water mass dynamics?	time. Although, it is true that there will be long-temporal trends in water mass dynamics, these would be over geologic times scales, although recent climate change is thought to have a modifying effect. Unfortunately there are no recent studies aimed at describing water structure and dynamics in the area; recent work focuses primarily on biology and tend to cite the original papers of Bianchi et al., 1982; Peterson and Whitworth, 1989. The text will be updated for clarity.
ED 32	Page 263: 8 water quality profiles completed within Berkeley Sound survey area over 1-month time period- very short time interval for collecting data or is data still being recorded? Mention of surface temperatures as recent as 2016 and 2017. Where is information kept such as report or data portal?	There is now limited activity planned in Berkeley Sound (13 months [total] of two vessels in non-consecutive activity). Results of profiles indicated relatively well mixed, oxygenated water, which makes sense given the relatively shallow depths, tide, and the persistent wind causing vertical mixing. There is no indication that the water column structure will vary widely from this, but will indeed have some daily and seasonal variation with strengthening and weakening of a shallow thermocline that is reflective of seasonal air temperatures affecting surface water. The water quality profiles (CTD data) is detailed in the Gardline/Benthic Solutions report that is available through the Data Centre or on request. Note that continued Berkeley Sound baseline data collection effort was not considered necessary once inshore transfer in Berkeley Sound was discounted.
ED 33	Page 277: Organic matter in sediment can influence chemical and biological processes- Survey carried out by Gardline post drilling campaign is in 2013 report but not readily accessible, unable to be found.	All commissioned surveys can be made available upon request.
ED 34	Page 277: TOM and TOC levels were found to be 5.6% and 0.9% respectively- similar values to pre-drilling survey nearby in 1998, but unable to corroborate data.	All commissioned surveys can be made available upon request.
ED 35	Page 278: Polycyclic aromatic hydrocarbons from pyrogenic sources due to flare stacks among other reasons- is this going to be monitored as the oil production commences?	Navitas will monitor and report all air emissions in accordance with regulations.
ED 36	Page 284: How many recorded oil spills have occurred since this survey was completed in 2012/2013? Is it worth repeating this survey to get a true baseline to be able to determine any impact of production of oil and provide more up to date data for point of comparison for the future?	A list of recorded spills in Stanley Harbour, Port William and Berkeley Sound has been provided by FIMA and will be included in the updated, finalised EIS. The baseline environmental survey of Berkeley Sound was completed by Benthic Solutions Limited for Premier Oil in 2015. An SMSG report

Reference	Representation	Navitas response
		(2012) noted that there have been numerous fuel oil diesel spills in Berkeley Sound, and section 7.3.7.2.2 references this SMSG report as background context when reporting on the outcomes of the 2015 baseline survey, which indicate that the baseline situation in Berkeley Sound is not a pristine location in terms of hydrocarbons even prior to any oil industry activity in the area. Regarding the suggestion of repeating the survey to get a true baseline for comparison in future, impact from Oil production is not considered relevant regarding Berkeley Sound. There is no plan for inventories of crude oil produced at Sea Lion to enter Berkeley Sound. Berkeley Sound is anticipated to be utilised by the Large Transport Vessels (LTVs) for a maximum period of 13 non-consecutive months. There will be bunkering of MGO to these vessels in the Sound, with strict operating guidelines in place. Bunkering in Berkeley Sound is already a common occurrence for numerous (non oil industry vessels). Navitas does not consider that there is any merit in re-examining Berkeley Sound environmental baseline given the limited nature and scale of Sea Lion activity in Berkeley Sound, which is far less than that anticipated by Premier Oil when the 2015 baseline environmental survey was commissioned.
ED 37	Page 284: Polycyclic aromatic hydrocarbon levels are discussed but it is not mentioned what this means i.e. if these are within acceptable limits? PAH, particularly 2 and 3 ringed aromatics are carcinogens and we should ensure that this is firstly in a suitable level, and secondly is then monitored.	Extensive baseline surveys were conducted in Berkeley Sound ahead of inshore transfer which was subsequently discounted and is no longer part of the project. However, while these data serve as a great legacy for future work, monitoring is not considered necessary due to the small time frame and level of activity taking place in Berkeley Sound (two vessels moored for a non-consecutive 13 month period). PAH levels in Berkeley Sound sediments are mentioned in this section of the EIS which describes the environmental baseline and measured characteristics in Berkeley Sound. The baseline PAH levels encountered have not been caused by oil industry activity, as they were measured prior to any industry use of the Sound. As such whether the PAH levels encountered are within acceptable levels is a matter for FIGs consideration. Furthermore, given the scope and scale of Sea Lion

Reference	Representation	Navitas response
		development activity anticipated in Berkeley Sound (up to 13 months' vessel logistics operation and MGO bunkering), ongoing monitoring of PAH levels would not seem a Navitas responsibility.
ED 38	Page 287: Cd and Ni are above the ERL levels	Noted, see also ED 37.
ED 39	Page 288: V is in low concentrations - a good monitor for the effects of oil production as it is present in most crude oils.	This section of the EIS refers to the environmental baseline survey of Berkeley Sound in 2015. At that time Vanadium was found to be in low concentrations. As oil production activity will not be undertaken in Berkeley Sound, and no crude oil produced will be present in Berkeley Sound at any point Navitas disagrees with the suggestion that Berkeley Sound V levels will be good monitor for the effects of oil production.
ED 40	Page 289: Oceanography in summary table - mentions priority to GAP project- It is unclear if this has been addressed by the GAP project or is outstanding to complete	Oceanography was recognised as a GAP in the scoping stage, but was not adopted as part of the scope for the GAP project. For the purposes of the EIA, the oceanographic data available is sufficient and valid for the purposes of the modelling. We will clarify the text in the post consultation EIS.
ED 41	Page 292: When was the last time data for the NFB and Sealion Field was gathered on the phyto and zooplankton communities?	A small area of like Sea Lion field is highly dynamic and indeed phyto/zooplankton were not identified as a gap.
ED 42	Page 298: Why was kelp coverage only surveyed in winter? Many species of seaweed have their maximum growth and extent in summer, just showing winter coverage of Berkeley Sound can be misleading and bias the information. Information for other kelp species extent is available however the EIS only includes Giant kelp extent	The commenter is referring to Land-Sat imagery used. This was likely restricted by availability of good quality images. However, a number of sources and analyses were used to fully assess kelp coverage. Kelp was mapped using a variety of sources including analysis by EnvSys (2016) further investigating kelp beds as detected below the water surface, and increased resolution. Sentinel satellite images (10m resolution) under the DPLUS 065 'Mapping the Falklands & South Georgia coastal margins for spatial planning' project. See the same section for further info.
ED 43	Page 301: While they can be certain none were found in their survey, the EIS says that there is at least a 50% probability of VMEs being present in the production area therefore habitats of high conservation importance cannot be ruled out.	This statement has been revised. Interpretation of both the SAERI (2023) VME study and the Gardline (2013a) survey suggests that even though some VME indicator taxa have at least a 50% probability of being present, the lack of their observation in the Gardline study suggest that they are likely to be sparsely occurring in the focal area. This makes sense, given that many VME indicator taxa are related to drop-stones (hard substrate) amidst vast areas of silty mud. Additionally, VME indicator taxa are predicted to be widely distributed around the FOCZ, suggesting that

Reference	Representation	Navitas response
		VME's potentially impacted within the drilling area will have a high likelihood of recovery.
ED 44	Page 305: EIS mentions that station 31 is close to the LTV anchorage sites but not what was found in this area. Is that not of more significance than the stations mentioned that may not be close to the LTV anchorage sites?	Thank you for the comment. Navitas will add the findings of Station 31 to the text.
ED 45	Page 323: There is some uncertainty in the data and if habitats appear widespread does not mean that they are not environmentally sensitive or important areas. Could be important source populations for other locations	The commenter is correct. However, referring to the definition of 'Sensitive' in section '8.5.2.1 Assessment of sensitivity of receptors'. In summary, commonness of the habitat suggests that the probability of recovery after an impact is high, and therefore less sensitive that for example, a habitat that is only found at one particular location. This text will be update to make this clearer.
ED 46	Page 328: There is meant to be a summary of the NFB however it is the exact same text that is used in the information for Berkeley sound. This is an error and needs correcting	Noted. This will be amended.
ED 47	Page 330: What is the significance of skate species spawning in the area? Which species and are these on the IUCN Red List? Is there a data gap that needs to be further surveyed to fully understand potential impacts?	There are data gaps in this area as the commenter points out, due to lack of commercial fishing in this area. Available studies show that the main species is the yellownose skate (Dipturus chilensis) and is typically feeding when in the area of interest. IUCN status is given in the text.
ED 48	Page 330: Coral is mentioned in the Northern Slope area, there is no previous mention of this in previous sections. With the proximity of the site to the NFB there is the potential corals could be present at the site.	Its not quite clear what the commenter is referring to here. However, coral species and distribution is described extensively in Section 7.4.3.
ED 49	Page 344: EIS should be using up to date IUCN red listings. April 2020 is not considered current. Please update.	This will be reviewed and updated as propriate.
ED 50	Page 344: The use of the JNCC SAST data is of concern as it is over 20 years old. Is it still believed to be representative of present-day populations?	Baylis et al. (2019) highlights that for nine-species tracked, the probability of occurrence is highest on the Patagonian Shelf, shelf slope and the Burdwood Bank (Fig 7-53, pg. 360). These findings are similar to the at-sea distribution presented for the same species (White et al. 2002). This is likely to reflect productivity on the Patagonian Shelf, being linked to the Patagonian Shelf, slope and Burdwood Bank (static features, associated with predictable areas of enhanced productivity) (e.g., Fig 7-35, pg. 293). Based on the predictive models, and knowledge of local oceanography, the importance of the Patagonian Shelf around the Falkland Islands is unlikely to have changed over the past 24 years, hence animal distribution is still

Reference	Representation	Navitas response
		likely to be associated with the Patagonian Shelf. This will be made more explicit in the post consultation EIS. The EMMP aims to collect further data in the field, specifically using Seabird and Marine Mammal Observers on two vessels for the initial years of the project (post sanction, pre-First Oil and post-First Oil).
ED 51	Page 382: Species have been given acronyms or codes without any explanation to what those codes mean or reference of where to find them. Please update table caption to explain what the codes mean.	Noted. This will be amended.
ED 52	Page 481: EIS states that Navitas is currently working on an update to the Sea Lion socio-economic environment of the Falklands - when will this be ready?	The updated socioeconomic impact assessment is currently expected in Q4 2024.
ED 53	Page 482: Census data is not up to date. Full census now available: The 2021 Census asked people to state their national identity: 42 % of residents considered themselves Falkland Islanders, 18 % British, 7 % St. Helenian, 4 % Filipino and 3 % Chilean (FIG, 2023). However, census data stats 54% identify as FI, 22% British, St Helenian 8%, Filipino 5%, Chilean - 4%	This reflects the census data tables provided prior to the census being published by FIG Policy Dept to calculate these numbers, this reflects the % of ppl present on census night (following Table 1e in the census tables provided). See below but it is understood the final census report was adjusted to include those not present on census night where possible. These numbers will be updated to reflect the published census numbers.
ED 54	Page 482: 433 work permit holders were recorded in Stanley (FIG, 2023 - 456 in census). 663 employed by FIG - 33% as per 2021 census not 487 as per EIS.	Table 8a in the census report notes 433 work permit holders (total), which correlates with the data provided by FIG in the detailed census tables. Although it is noted that in Table 11 in the census report there are 456 WPHs in Stanley. It is understood that while the census data records only the people present on census night a lot of work was done to consider those not present, could this account for the difference in values? We'd be grateful if FIG could confirm. However, the EIS will be amended. to reflect the published census report. Data provided in the census tables notes 487 as FIG employees within Stanley, It is understood the figure in the census report (633) includes UK government and GSGSSI employees as well.
ED 55	Page 483: The land surrounding Berkeley Sound is divided between six landowners / farms (Figure 7 115 below) and is primarily used for grazing sheep. However, several farms also run tourism-based businesses, which are described in Section 7.7.4.6.1. What about FIG owned Kidney Island? It is a National Nature reserve	Noted, this will be added.

Reference	Representation	Navitas response
ED 56	Page 484: 'Summary Report of Fishing Activity over the Sea Lion Development Area', conducted by Pale Maiden Consulting (April 2013), and the FIG Fisheries Department Catch Report Database from 2013 to 2022 (FIG, 2023). Some information is also taken from the Fishing and Trawling Risk Study conducted by Jee (2013) on behalf of POEPL. Are there more up to date studies?	2022 data (available in 2023) was the latest available from FIG at the time of writing. Anatec Ltd (2024a and 2024b) were based on 2023 FIG data and will be added to the text.
ED 57	Page 485: Argentinian shortfin squid - annual variations but has largest catch 2013-2022 - grid where drill centres taking place are open to fishing vessels to fish for these but have been rarely fished - This grid square has been rarely fished by any licensed vessels in recent years. Total annual fish catch for each year would be good to see in table	This can be added. Thank you from the comment.
ED 58	Page 485: Catches and fishing effort in the grid square occupied by the Sea Lion Field (XFAK) are relatively low (FIG, 2023). This said, exceptionally high catches of Ilex squid were made in 2014, 2017, and 2022 reflecting high catches throughout the zone during these seasons. Overall however, these data indicate that generally the area of the Sea Lion Field is rarely fished. - but it has been fished and a lot of fish caught very recently too - should not be discounted.	In relative terms, there is a very small fraction of fishing done in this area. The commenter correctly points out years where catch has been reported in XFAK and Navitas has looked into this more closely. Results of this analysis shows that although catch by a few vessels has been attributed to XFAK with either their mid-day or midnight position, in actual fact the vessel did not enter this grid square at all, as evidenced from Marine Satellite -based AIS. These are likely to be rare, accidental mis-reporting's. Navitas will point these out to FIFD for further investigation.
ED 59	Page 487: Fishery Patrol vessel - inconsistencies in data: • 2014 - 37 visits.; - table says = 37 visits • 2018 - 48 visits. and table says 34 visits • 2022 - 27 visits (Table 7.45). table says 28 visits	Noted, this will be updated.
ED 60	Page 494: Cargo vessels - Cargo vessels visit Stanley on a regular basis and require a berth at FIPASS to transfer cargo onshore. In 2014, 38 cargo vessels visited FIPASS. In 2018 cargo vessel visits to FIPASS were slightly less at only 32, and less again in 2022, visiting on 27 occasions (Table 7.45). Table clearly says 2014 - 37, 2018 - 32 and 2022 - 25	Noted, this is a typo (table correct, bullets to be updated).
ED 61	Page 496: In 2014, 61 yachts came into Stanley Harbour with 71 yachts in 2018. This number had reduced greatly by 2022 with only seven yachts entering the harbour. These vessels usually moor at the Public Jetty, the East Jetty or anchor in the Harbour. - where did this data come from because it only mentions yacht in the table and not pleasure craft?	This section references the Table above as most yachts do not go alongside FIPASS but do enter Stanley harbour, will add ref to Table. Will remove 'pleasure craft' from title.

Reference	Representation	Navitas response
ED 62	Page 497: The only asphalted roads are those within Stanley, those within the Mount Pleasant Complex (MPC) and most of the main road between Stanley and MPC. - needs updating- all tarmacked now	Will be updated.
ED 63	Page 498: In April 2010, over a 19 day period, 5,484 vehicles (of which 2 % were Heavy Goods Vehicles (HGVs)) used the road between Stanley and Mount Pleasant. This represents a 170 % increase over the previous 10 years for all vehicles (FIG, 2012b) - Use more up to date figures?	Navitas checked with PWD for any updates but there has not been a survey since then.
ED 64	Page 498: MPC Road usage has generally increased significantly year on year, however exact recent trends are not certain and road usage may have stabilised. - Are these assumptions without up to date data - may have stabilised - may not?	As above there has not been a more recent survey but with the increase in population, SAERI suggest it is a reasonable assumption to make that traffic increases as population increases, particularly with the high vehicle to person ownership in the Falklands.
ED 65	Page 501: The 2021 Census recorded a total of 1,523 resident households, of which, 1,147 (75 %) are located in Stanley (Table 7.48). - census states 1,600 total and Stanley = 1,148	The census data tables provided by FIG prior to publication of the census report noted 1,523 resident households (1,147 in Stanley), this will be updated to reflect the final census report numbers.
ED 66	Page 501: In 2021, the majority of houses in Stanley were mortgaged or owned outright (54%) (Table 7.48). Approximately 40 % of Stanley households were held under rental, while a further 5 % were provided rent free as part of an employment package (Table 7.48 - where did this info come from as can't find it in census?)	Noted. This will be amended.
ED 66	Page 509: Household batteries are collected within Stanley and recycled in the UK. Currently they are only collected, but recycling is expected in the future.	Noted, this will be updated.
ED 68	Page 520: Identified 2 wrecks in close proximity: 1 x 100m away and 1 x 1km away - EIS states they are there but has not said anymore. Has the risk to these wrecks been assessed?	The 100m and 1km distances referred to in this section are the distances that the wrecks have 'moved' from their charted position to the position actually recorded during the survey. Both wrecks are not considered to be close enough to the LTV anchoring locations to be disturbed by the activities proposed.
ED 69	Page general: If the receptor is deemed low due to IUCN status - will this be an iterative process in that should the IUCN status change during the lifetime of the project would this new status be reflected in the risk assessment?	As the EIS is reviewed every 5 years, changes to IUCN status will be captured then. This will then feed into the EMMP process if there are changes which impact on monitoring and management actions.
ED 70	Page 550: It is not clear how the fund will be allocated and whether this is for a biodiversity fund being set up by Navitas or using the already set	Navitas has committed to a dedicated carbon and biodiversity offsetting fund that will be financed by contributions from Navitas and governed by a steering group comprising Navitas, FIG, NGO stakeholders and

Reference	Representation	Navitas response
	up Environmental Fund. How have offsetting measures have been considered by the operator - where will this be reported?	technical advisors. It shall be aligned with FIG's offsetting guidance and policy. Initially the fund will invest in the feasibility of potential local offsetting projects. Navitas will then finance the viable projects that are identified. The Fund will also invite proposals for funding of projects to achieve offsetting objectives which will be considered for approval by the multi-agency steering group. The adopted offsetting projects will be overseen by the governance committee and their performance will be reported upon publicly. In the event that local offsetting cannot be achieved successfully, Navitas will look to invest in international offsetting schemes. The performance of Navitas' offsetting endeavours will be reported.
ED 71	Page 561: Has disturbance to the human population through onshore light in Berkeley Sound been considered? Receptors include settlements on the Sound.	Yes, see Section 11.8.
ED 72	Page 561: Would discharge of chemicals during drilling, or use and discharge of chemicals in produced water, or discharge of hot water from cooling systems, not affect plankton & water quality & marine mammals?	The table will be reviewed against the relevant chapters and both will be updated if considered necessary.
ED 73	Page 590: A maximum of two LTVs will be present in Berkeley Sound for only eight months (c. August-2022 to end March-2023), should this be 13 months as stated on page 580?	Noted. This will be amended.
ED 74	Page 592: Potential receptors - in bullet points missed off Human populations - identified as needing further investigation in table 9.1	Section 10.1.1 states in a note that impacts to humans are assessed elsewhere (Chapter 11.8).
ED 75	Page 619: Helicopters may have a significant impact on penguin behaviour, although degree of habituation to aircraft is believed from South Georgia study- Have any studies been done on the tourist helicopter flights?	Navitas are not aware of any studies on local tourist helicopter flights (which no longer operate), and the South Georgia study is considered the best comparison. It should be noted that tourist flights operated differently to the proposed Sea Lion helicopter flights as, when operating, they landed in close proximity to penguin colonies, while the O&G helicopter flights will be flying overhead, in accordance with the Falkland Islands Low Flying Handbook.
ED 76	Page 624: Fur seals and sea lions most vulnerable to noise during pupping - between October and January combined	Yes, this is noted in the 5th bullet point.

Reference	Representation	Navitas response
ED 77	Page 626: With reference to the Falkland Islands Low Flying Handbook that shows where not to fly - IBA, NNR etc, are these locations up to date and correctly identified in the EIS?	These are replicated as provided by the FILFH, Navitas understand this is a FIG document.
ED 78	Page 628: There is no monitoring mentioned in terms of the number of flights, or the impact of flights on identified species, this does not appear in Chapter 15 (EMMP) either.	The residual impact from helicopter flights does not trigger an EMMP action as it is neither significant nor has a receptor that is considered 'High' or 'Very High' sensitivity, and confidence is 'Certain'. Although number of helicopter flights will be logged by Navitas.
ED 79	Page 628: Most vulnerable is King Penguin at Volunteers Point - almost all the population of Falklands' King Penguins are there, and they occupy location year round	Agreed, Navitas feel this is reflected in the text in section 10.2.6.1.
ED 80	Page 629: Is monitoring the impacts on the IBA and NNR considered as part of the EMMP or offsetting?	See response to comment ED78. As the impact of helicopter use is assessed as 'Low' no offsetting or monitoring measures are proposed.
ED 81	Page 635: Use of a 1971 study - are there more recent studies which could be used?	The reference is intended to indicate that the way seabed reacts when something lands on it has been verified. It is not expected that this will have changed since 1971.
ED 82	Page 648: With the data gaps, the numbers of geographical important species are not well know. Given that in section 7.4.3.2.3 there is a 50% probability of VME species present, it cannot be ruled out that habitats of conservation importance are present. This statement should be reviewed.	The text in 7.4.3.2.3 has been revised to indicate that interpretation of the studies in this area suggest that although VME indicator taxa may be present, they are likely to be sparsely occurring in the focal area. Additionally, VME indicator taxa are predicted to be widely distributed around the FOCZ, suggesting that VME's potentially impacted within the drilling area will have a high likelihood of recovery. Therefore, sensitivity is likely to be low. Please refer to '8.5.2.1 Assessment of sensitivity of receptors' for definitions.
ED 83	Page 657: There is hardly any baseline data on seabird injury thresholds to underwater noise, despite acknowledgment that penguins and diving birds do spend significant time underwater. Info is all about fish and marine mammals. For birds it seems to be entirely based on 'marbled murrelet' - Is this sufficient?	Additional research has been found to support an assessment of underwater noise impacts on seabirds, and the chapter is being revised accordingly. See also FIFD 54.
ED 84	Page 666: This section presents a risk assessment for offshore underwater noise on seabirds. Given that there is hardly any baseline info going into this assessment, and it focusses only on penguins and ignores other diving seabirds, much of this assessment is based on assumptions rather than facts. There is no info given about the	See comment ED 83 and note that a confidence assessment will be added to the risk assessment for seabirds in the revised chapter.

Reference	Representation	Navitas response
	confidence of this assessment (unlike for marine mammals). Whilst we realise this kind of information may be very hard to measure, we do not feel like it has adequately assessed this risk to seabirds.	
ED 85	Page 686: Sea bird and Marine mammal observers will be on board vessels to provide ongoing monitoring of birds present. As well as ongoing noise monitoring to understand better the baseline noise levels. Will this will be in the EMMP?	Yes, see Section 15 of the EIS.
ED 86	Page 690: The EIS notes that the actual locations of the anchoring points for ships in Berkeley Sound are yet to be decided, and will be chosen in conjunction with FIG to be least bother to other vessels that use the area. We would want to make sure that the locations are not too close to Kidney and Cochon NNR so that underwater noise does not disturb wildlife.	The anchorage locations will be chosen in consultation with FIG - criteria for site selection will cover both environmental considerations and disturbance to other users of Berkeley Sound. Anchorages close to the Kidney and Cochon NNRs would not be considered appropriate.
ED 87	Page 719: It is clear that a baseline is still required for toothfish and other species in this environment. Who will be checking that this baseline is done?	Fisheries in the areas were assessed, and the baseline data comes from the Falkland Islands Fisheries Department. There are gaps however, and these are acknowledged, noting that the assessment has taken a precautionary approach.
ED 88	Page 744: Sampling and analysis two times per day when discharging and once per month when reinjecting - Who would do the analysis? Where would the analysis take place?	There will be some automatic detection devices on the FPSO that measure oil in water and other discharges and a laboratory technician will be onboard the FPSO to undertake analysis.
ED 89	Page 746: Discharge giving rise to a visible oil sheen- will others be notified as well as DESNZ?	Thank you for your comment, and yes, Navitas will follow the PON8 requirements as described in Section 10.7.1.1.5. The narrative in 10.7.1.1.3 will be amended for clarity.
ED 90	Page 746: Will there be an independent representative offshore to ensure compliance with reporting measures for oil sheens?	A PON 8 is required in the unlikely event an oil spill event. Further reporting would then be in accordance with direction from FIMA and DMR. FIG may choose to deploy an independent observer in the event that an oil sheen is reported. Please note that testing of Sea Lion crude by CEDRE has demonstrated that it is unlikely that Sea Lion crude will produce a visible sheen in water.
ED 91	Page 747: Will macerated food after discharge affect algae levels and attract bird life etc?	As the impact to the water quality and plankton is Very Low, there are unlikely to be impacts up the food chain.
ED 92	Page 748: How much monoethylene glycol will be used in hydrotesting of the umbilicals? This is a PLONAR chemical; toxic if ingested in large amounts; takes weeks to break down.	MEG is transported in closed containers. MEG is only used in a closed loop processing circuit - i.e. to prevent hydrate formation. Therefore,

Reference	Representation	Navitas response
		unless you had a major containment issue there is no risk of MEG ingestion. MEG naturally depletes in closed system.
ED 93	Page 748: Discharge of warm seawater discussed in section 10.8- What are the impacts to the local marine environment?	Please refer to section 10.8 for further discussion on the impacts of the discharge of seawater to the local marine environment.
ED 94	Page 748: PW from oil wells first starts to arrive before the PWRI are commissioned. Volumes of PW that may be discharged are as yet unknown. When will they be confirmed?	There will always be some PW discharge while the PWRI units are commissioned. It is not possible to determine at this point how much PW will need to be discharged prior to the commissioning of the PWRi, as it uncertain how long commissioning of the PWRi will take. However every effort will be made to ensure that discharges will be low-volume and short-lived. In EIS Section 10.7 Navitas states: 'It is anticipated however that there may be discharge of PW when it first starts to appear and the PWRI units are being commissioned. At the time of writing it was not possible to estimate when PW may start to arrive, nor how much may be discharged during the commissioning phase. However, water will start to cut from the production wells at different times and the PWRI commissioning process will commence upon first arrival of water from any one of the production wells. Therefore, all efforts will be made to minimise discharges that follow between the first 'water cut' and full implementation of the PWRI system. Therefore, it is anticipated that PW discharges during the commissioning stage will be low volume and short-lived.'
ED 95	Page 750: Are there any values that have to be complied with for grey and black water after treatment for discharge? Or any testing that is required before discharge?	As described in Section 10.7.1.1.6: In compliance with MARPOL Annex IV, which applies to vessels > 400 GT or certified to carry > 15 persons on board, untreated black water (sewage) may only be discharged beyond 12 nm from shore whilst the vessel is moving. Between 3-12 nm, sewage must be treated prior to disposal at sea and only if vessels are moving at a speed of greater than or equal to four knots. Depending on the vessel's sewage treatment equipment, some sewage may be discharged within three nm, and again only if it is travelling at a minimum of four knots. For stationary offshore 'vessels' such as the FPSO and MODU, although they are >12 nm from shore, sewage must be treated before discharge to sea.

Reference	Representation	Navitas response
		Food waste must be macerated to ensure a maximum solid particle size of 25 mm prior to discharge as required under MARPOL Annex V, to aid its dispersal and decomposition in the water column.
ED 96	Page 750: Oil separated from drainage water on MODU will be shipped to Stanley prior to incineration- What is the plan if the incinerator in Stanley is not operational by this time? Or is out of action? Has this been included and referenced in emissions data?	See section 10.10.2.2.1 which states that 'occasionally the recovered oil may be sufficiently ‘off spec’ that it will not be suitable for processing offshore and in these instances it will be collected and stored in drums / transit tanks and will be shipped back to the onshore supply base.' From there it will be transferred into a sludge truck for disposal at the FIG Stanley incinerator. It is understood that the FIG Stanley Incinerator will be operational by end of 2025. This aligns with Navitas' operational schedule. Should the FIG Stanley Incinerator not be available Navitas would: 1. Store the waste in suitable containers onshore until the FIG incinerator is once again available 2. Store the waste in suitable containers onshore until offshore treatment on board either the MODU or FPSO is available 3. Store the waste in suitable containers onshore until a suitable volume is ready for export under the Basel Convention to the UK. Waste oils from this process shall always ben candidates for re-use and incineration is a secondary solution. Section 10.10.2.2.1 will be updated for clarity. Emissions for the FIG incinerator are not included in the assessment but those associated with returning vessels, which would take waste back to the UK, are included. Please refer to comment ED 131.
ED 97	Page 750: Hypersaline water produced from desalination will be discharged to sea- At what concentrations will they be? What are requirements for concentrations? What is the frequency of the discharge?	The minimal amounts of hypersaline water produced will be diluted prior to discharge. As such it is not anticipated that discharge will have any environmental impact. The selected FPSO is currently operating in the UK North Sea and meets all legislative requirements under this regime. The hypersaline concentration is expected to be c. three times that of seawater and will be discharged on a continuous basis as the desalinators operate to produce the freshwater.

Reference	Representation	Navitas response
		See also ED 104.
ED 98	Page 750: CW will be dosed with a biocide to prevent marine growth, discharge will contain biocides, CW plume will be buoyant and remain in top 200m of water column, and chemicals selected will minimise potential environmental impact. Detail is lacking on these chemicals - what are these chemicals?	As stated in Section 5.9.1.1 details on the specific operational chemicals which will be used during the Phase 1 & 2 Development are not yet known. Nonetheless, all operational chemicals used during the Development will be selected to minimise environmental impacts as much as possible. Further detail on the UK legislation which will be adhered to is provided in Sections 10.6.1.1 and 10.7.1.1. All chemicals selected will be listed on the Offshore Chemical Notification Scheme (OCNS) List of Notified and Ranked Product generated by CEFAS (Link).
ED 99	Page 751: Details of biocides discharge to prevent marine growth are not given, what is likely to be used?	See ED 110.
ED100	Page 751: Who tests discharge samples?	There will be some automatic detection devices on the FPSO that measure oil in water, and other discharges. A Laboratory technician will also be onboard the FPSO can also undertake analysis. Please also see ED 88.
ED 101	Page 752: If specific composition of Sea Lion PW is not yet known, but estimated, should this be followed up when PW is obtained?	Yes, this is captured in the EMMP. Once PW is produced analysis will be done and the PW sampling confirmed. The EMMP text will be checked and amended. to reflect this as necessary.
ED 102	Page 752: Although it is clear that the PW concentration of chemicals referenced in this section are small concentrations (Naphthalene, Dibenzothiophene, Dibenzanthracene, Chrysene, Benzofluroanthene, Benzopweylene, Benzofluoranthene, Benzopyrene, Benzanthracene), what is the potential impact of long term discharge of these chemicals? Concentration of MAH and some Alkyl phenols are also higher than PNEC.	Section 10.7.4.1.2 will be subject to an updated lit review to provide more data where possible.
ED 103	Page 756: Will the toxicity of the PW be monitored on a regular basis to check for accumulation of these contaminants in the surrounding area?	Yes. Regular PW testing and 5 yearly seabed surveys. Navitas will include this detail in Section 10.7.5 of the post consultation EIS.
ED 104	Page 757: Not much information offered on hypersaline water: Doesn't discuss the impacts of the hypersaline water on the surrounding environment. It mentions the study measured instances of no more than 2mg/l above background salinity - what is the threshold of organisms in the ecosystem?	Noted. The subject matter will be reviewed and the narrative updated where necessary. In a study of the impact potential of hypersaline brines released into the marine environment, Dewar et al. (2022) found that dispersion in a hydrodynamically active region like the North Sea acts to dilute disposed brine rapidly such that the potential impact footprint is small, measured in tens of meters. This was found to depend on the release scenario and site specific data, for example the in-situ conditions such as currents and

Reference	Representation	Navitas response
		mixing. The method of brine disposal has a significant influence on dispersal, and brines released nearer the sea surface disperse more rapidly, compared with those released at the seabed. All hypersaline discharges at the Sea Lion field will be to the surface. And into such a dynamic environment. Marius Dewar, Jerry Blackford, Tony Espie, Sarah Wilford, Nicolas Bouffin. 2022. Impact potential of hypersaline brines released into the marine environment for CCS reservoir pressure management, International Journal of Greenhouse Gas Control, Volume 114, 103559, ISSN 1750-5836.
ED 105	Page 757: Will the effect on marine life due to the low concentrations of produced water be monitored as mesocosm studies show low concentrations of produced water may have subtle effects on marine planktonic communities?	The base case is to re-inject, so discharges are being minimised as far as possible. This is a localised discharge and will be mixed and dilute rapidly. The needs for in situ sampling may be considered should it be justified based upon the results of the RBA modelling. The post consultation EIS will be updated to reflect this.
ED 106	Page 758: Increased seabirds at site due to discharged food - will they be exposed to discharges of PW and contaminants within it?	Discussion on indirect impacts such as these are included within the EIS and are more specifically itemised within Chapter 13. Navitas will update Chapter 13 with worst-case impact colours in the post consultation EIS. See also ED 191
ED 107	Page 759: Can bilge oil and other discharges that produce oil sheens be minimally discharged on calmer days as dispersal through water less effective in calmer weather?	All discharges will be legally compliant and discharged under permit. Where possible Navitas will endeavour to minimise discharges on calm days.
ED 108	Page 761: Test on bulk crude oil at 55 degrees released into 18 degree seawater- test not representative or a replication of Falkland Islands waters. Can this be replicated with water conditions mimicking the Falkland Islands?	CEDRE leading facility for this type of testing. The CEDRE test work represents the worst case (hot oil into warm water). It is not considered necessary or practical to repeat the tests with lower water temperatures. while the outdoor test basin was warmer than NFB, CEDRE drew a firm conclusion from the experiment that sheens were very limited, and the longer-term behaviour in the form of waxy masses was shown in the 9-day flume test at 8 Celsius. Navitas will add this clarification to the post consultation EIS.
ED 109	Page 761: Interactions of the birds with oil may affect reproductive success and thermoregulation. Unlikely to occur from a sheen alone.	There is a good amount in the literature on this. Sea lion crude is waxy and produces a very small sheen when released into water at 18 degrees.

Reference	Representation	Navitas response
	However sheens of thickness of 0.1 micro metres thick could result in measurable oil transfer to feathers. Have interactions of birds with oil contamination been fully investigated or explored here?	However given the metocean conditions, any sheen that might form would be temporary. A precautionary approach has been taken in the assessment to show worst case impact of sheens on birds from Sea Lion crude.
ED 110	Page 762: What biocide is likely to be present in discharge water? What impacts are likely?	Biocide is added to the seawater/produced water system for treatment prior to injection into the reservoir to inhibit biological growth in the reservoir and to prevent reservoir souring. Biocide will not be added to discharge water. As stated in Section 5.9.1.1 details on the specific operational chemicals which will be used during the Phase 1 & 2 Development are not yet known. Nonetheless, all operational chemicals used during the Phase 1 & 2 Development will be selected to minimise environmental impacts as much as possible. By nature, biocides are intended to harm marine life, but efforts will be made to ensure selection of a Cefas Gold product with no Sub warnings (there are currently 41 products on the Ranked listings for production and 15 for drilling ops).
ED 111	Page 762: PW that has OIW above limits will be diverted to off-spec tanks - what happens to this?	Off-spec water will be routed back into the separation process and Sections 5.8.5.4.1 and 10.7.2.5 will be amended. for clarity.
ED 112	Page 762: Volumes of grey and black water per day per person- how many people will there be? Or likely to be? Actual amounts of grey/black water not currently calculable without this.	The personnel numbers are more explicitly provided in Chapter 10.10 on Waste. However, the estimated personnel numbers will be added as a footnote to Table 10.45.
ED 113	Page 763: Volume of water in table 10.46 average is calculated incorrectly	This has been checked and Navitas note the numbers are correct but cannot be exactly replicated in the word document due to rounding in the excel spreadsheet. A note will be added to this effect.
ED 114	Page 763: Will record be kept of bilge water and drainage water from MODU/FPSO, whether above or below 15mg/l?	Yes. All operational discharge records will be kept in line with the current legislation (Section 10.7.1.1). Reference to reporting requirements will be added to Section 10.7.4.4.4.
ED 115	Page 763: W discharges will occur 7% of the time - 25 days per year amounting to 428,294 m3- Is there likely to be more than this, and if so, what will happen?	At all times the outputs to the environment, produced water modelling is based on the realistic worst-case. If this is found to be an underestimate of PWRI down time the impact assessment would need to be revisited. As described in 10.7.4.5.
ED 116	Page 765: Discharge temperature of the PW is predicted to be around 75 degrees? Salinity is anticipated to be around 6.4mg/l - What impact will this have on the surrounding area?	Section 10.8 describes and assess the impacts of thermal discharges and 10.7 assesses the of PW with the support of modelling.

Reference	Representation	Navitas response
ED 117	Page 767: Modelling seems to suggest benthic community will not be affected by PW as it will sit in the top 80-120m of water due to temp and salinity. What about the rest of the water column?	Section 10.7.6.1.2 assesses the impact of PW on water quality and marine fauna that may be exposed but the point of the modelling is to understand and predict the likely dispersion of the plume. As shown in Section 10.7.4.5.2.3 the discharged water does not descend significantly into the water column due to the temperature and salinity of the plume. The PW plume is confined to the top 80 m of the water column in early Field Life, and 120 m in late Field Life such that the deeper water and benthos are unlikely to be exposed.
ED 118	Page 772: No species or habitats of conservation importance will be affected? Good that chemicals will be chosen to minimise environmental impact, but what are these chemicals?	As stated in Section 5.9.1.1 details on the specific operational chemicals which will be used during the Phase 1 & 2 Development are not yet known. Nonetheless, all operational chemicals used during the Development will be selected to minimise environmental impacts as much as possible. Further detail on the UK legislation which will be adhered to is provided in Sections 10.6.1.1 and 10.7.1.1. All chemicals selected will be listed on the Offshore Chemical Notification Scheme (OCNS) List of Notified and Ranked Product generated by CEFAS (Link).
ED 119	Page 772: Grey water, black water and food waste causing slight eutrophication. Direct impacts are low- what about for seabirds and marine life?	As the impact to the water quality and plankton is Very Low, there are unlikely to be impacts up the food chain.
ED 120	Page 774: Will hypersaline water mix in 450m depth water - or will it remain localised and so therefore a problem for local marine life?	Hypersaline water is denser than seawater such that in a static environment it would slowly sink deeper and could affect the deeper water column. However, when discharged into the turbulent waters at the Sea Lion field location it is anticipated that dispersal will be rapid and equilibrium will be reach before any descent to the full water column could occur. See also ED 104.
ED 121	Page 774: Even though it is unlikely that both PWRI units would malfunction before PW is discharged, the significance of the impact is 'upper moderate ', and given the status of seabirds potentially affected, and potential effects of oiling, is there a contingency in place or considered for this, and for oiling of seabirds?	Navtias assume the question relates to 10.7.6.2.2 as the assessment in 10.7.6.2.1 is considered to be Very Low. With regard to the potential for oil sheens, this assessment is very precautionary and any off-spec waters would not be discharged such that only water within the compliance limits would be discharged, As yet it is not clear if the Sea Lion oil is able to form significant sheens when discharged in small quantities. The focus here is on preventative mitigation measures such that the likelihood of the series events that could lead to a sheen is very low.

Reference	Representation	Navitas response
		Nonetheless, should a sheen occur and should it affect seabirds, the Wildlife Management Plan would be activated. In compliance with the PON8, any sheens will be reported to FIG.
ED 122	Page 775: No offsetting is determined necessary to reduce impact, e.g. seabirds attracted by discharged food waste?	Offsetting is not designed to reduce an impact. Further, the impact of the discharge of macerated food on seabirds is not significant (moderate or above) so it does not qualify for offsetting. See OMO 1994 as amended. (significant impacts to be offset).
ED 123	Page 784: With little known about the oceanic response to thermal discharge, is the assumption that discharges wouldn't alter temperature in a sustained way valid?	As the discharge is to the open ocean it is not expected that any localised temperature change at the point of discharge will lead to sustained change in the temperature of the ocean.
ED 124	Page 785: Produced water has a salinity of 6.4 (fresh water). Are the effects of discharging this fresh water accounted for anywhere in the EIS? Will hot fresh water act differently to hot saline water?	Discharge of freshwater is not itemised in the assessment of PW over and above the impacts of the potential content of PW. The impact of freshwater which will disperse quickly is considered as negligible and will be added to Table 9.1 to indicated this impact has been screened out.
ED 125	Page 786: With different trajectories of the different thermal discharges and small periods of alignment, do these discharges have a cumulative effect on the area?	The rate of dispersion and the footprint of areas affected are such that the cumulative impact of overlapping trajectories is not considered further in the EIS.
ED 126	Page 788: Regarding the data gaps, should it not be said that there are indeed populations that are of geographical importance?	No, this concerns the benthos and heated infrastructure. The area is very localised.
ED 127	Page 788: What are the effects of thermal discharge on algal blooms? The EIS states that there is uncertainty around what continuous discharge will do in regards to algal blooms yet there is no specific monitoring identified for this.	Algal blooms tend to form seasonally when the combination of photoperiod and nutrient mixing is optimal. While sustainable temperature changes may impact upon the proliferation of algal blooms, the thermal discharges associated with the Sea Lion field will disperse rapidly and will not be sustained. Nonetheless, should such impacts occur, these will be recorded and monitored, not least as blooms could impact the seawater intakes. Navitas will review the text in the post consultation EIS to ensure that this is clear.
ED 128	Page 791: We question whether the sensitivity rating of 'very low' is accurate because we do not currently have an adequate baseline for what species are present. Cold water corals, if present, would have a much higher sensitivity to heat radiation and once gone may not be able to recover	Cold water corals are only associated with glacial drop stones in the area; these are patchy. Also note, the area will be surveyed prior to installation of subsea infrastructure or drilling.
ED 129	Page 798: What energy efficiency measures are being adopted in the vessels being used by Navitas?	Navitas will continue to explore emissions reduction initiatives prior to commencement of operations and throughout the lifecycle of the Sea Lion

Reference	Representation	Navitas response
		Field. Energy and emissions efficiency will form one of the evaluation criteria within the forthcoming tenders.
ED 130	Page 799: How will we know f-gases have been accidentally released?	F-gas releases are not identifiable at the time of the release. When the equipment is serviced, releases/leaks are identified by the amount of top-up required. For this reason, all equipment will be serviced in line with legislation. The servicing period is dictated by the GWP of the F-gas and the tonnage of CO2e that would be released in the event of an F-Gas release. Navitas commit to using low GWP F-gases.
ED 131	Page 800: Treatment of waste has not been referenced in emissions activity. Please amend	Navitas do not account for incineration emissions as, in discussion with FIG, it is assumed that the FIG incinerator will have been commissioned and fit for use. Emissions from shipping the waste to the UK are considered the worst case option and are accounted for in Section 10.9. To include emissions from incineration of waste locally and emissions from shipping the waste for disposal would constitute double counting.
ED 132	Page 801: Has the power demand of consumers been cross referenced with PWD?	Navitas assume from the page number (801) that the comment refers to Table 10.55. This table provides detail on the key consumers of electricity generated by the DLE turbines on the FPSO so no consultation with PWD was relevant.
ED 133	Page 801: What effect will a flare recovery package have on the emissions?	It is not possible to quantify the % reduction that could potentially be achieved at this stage, but it will be evaluated and assessed in FEED and later phases of the project.
ED 134	Page 802: If CCC have proposed that F gases are replaced by low carbon alternatives by 2030 - should this not be the case here?	Navitas will comply with all relevant FIG/UK legislation regarding the phase out of F-Gases. This will be reiterated in Section 10.9 and specifically in Section 10.9.1.1.4.
ED 135	Page 810: The values are under the wrong headings. Please amend	The source data will be checked and amended accordingly.
ED 136	Page 816: No inclusion of car use in the personnel transportation - only refers to air transfer. Please amend this	Fuel consumption data associated with onshore personnel transportation and other vehicle use is included within Table 10.64. The use of cars is included within the category 'supply base' in Table 10.66, so the emissions are included in the calculations. A footnote will be added to Table 10.66 to ensure this is transparent.

Reference	Representation	Navitas response
ED 137	Page 820: Table 10.64 Includes car transportation however in table 10.66 it is unclear which category it is included if at all.	Please see response to ED 136.
ED 138	Page 823: What renewable energy options have been put in place throughout the stage 1 and 2 development to reduce emissions?	Navitas has considered renewable energy options for its onshore infrastructure. Navitas was advised by the PWD Power Station that it is preferred that Navitas does not incorporate individual solar/wind power at its onshore infrastructure facilities as it is difficult for the Stanley grid to absorb any over-production or to accommodate spikes in demand that would arise in incidences in which the renewable energy sources could not supply onshore infrastructure demand (e.g. calm weather, low sunshine). As such, Navitas is exploring how it can support investment in municipal renewable energy generation and battery storage to secure both emissions reduction and offsetting objectives.
ED 139	Page 824: It would be helpful to separate out the contribution of different vessels to this total for each stage as the data to reach this extends over multiple tables in different sections of the document.	It would be possible to separate out the contribution of different vessels in each Stage of the Development. However, Navitas do not believe this would materially add to the estimation of emissions or to the assessment. In an already complicated Chapter, Navitas opt not to add more tables that do not effectively add to the chapter.
ED 140	Page 824: What about emissions due to construction of onshore and offshore?	Emissions from offshore construction are related to the vessels used and are included with the 'All vessels' line item in the relevant project Stages. Table 10.66 will be footnoted to indicate this. With regard to onshore construction, these are out of scope of this EIS and will be covered in a dedicated EIS and planning applications as necessary. This is described in Section 2.4 on the 'Scope of the EIS'.
ED 141	Page 824: Calculation for CO2e in each stage show possible rounding errors considering GWPs w/o cc feedback. Calculation for CH4 and N2O total project CO2e incorrect using GWPs w/o cc feedback	An extensive spreadsheet sits behind all the tables presented in the EIS. These spreadsheets calculate the data to many decimal places. Once these are rounded up/down to enable cleaner presentation in the EIS, the totals no longer exactly match the totalled figures. The spreadsheet has been extensively checked as part of the internal QC process. They have been checked again in response to this comment and Navitas are confident that the totals are accurate. A footnote will be added to Table 10.66, 10.67 and 10.69 to indicate that the data have been rounded up/down from many decimal places.
ED 142	Page 826: Calculations of CO2e for CH4 and N2O are incorrect, also unclear how the average emissions per year (CO2e) was calculated	See ED 141.

Reference	Representation	Navitas response
ED 143	Page 827: Calculations of CO2e for direct GHG are incorrect and consequently the total CO2e is incorrect	See ED 141.
ED 144	Page 828: How has the figure of 77.68 tonnes of HC gas that could be released been estimated?	The quantity of HC gas blanket that could be vented is based on the volume of the cargo tanks and works on the worst-case assumption that the VRP malfunctions when the cargo tanks are empty and remains out of commission for the duration it takes for the tanks to fill. In such a circumstance (albeit unlikely) the full cargo volume of HC gas would be displaced by the crude and vented to the atmosphere. It is very unlikely that this set of circumstances would occur such that this is considered to be a worst-case. The actual figure of 77.68 tonnes was based on the cargo tanks of a larger FPSO than is proposed for use, such that again, this estimates a worst-case. As the development becomes more mature, it can now be confirmed that the cargo tanks will be smaller and the text, and Table 10.69, will be amended. to reflect tanks half the size, such that the quantity of HC released would be 38.84 tonnes.
ED 145	Page 828: Regarding the emissions resulting from use of municipal electricity generation, has PWD confirmed if this estimate is realistic?	An Emissions Factor was requested from FIG but wasn't available at the time of writing. Navitas judge the EF used to be reasonable and on the conservative side and have referenced the source. Given the amount of emissions for this item is so small in comparison to the overall project, changing this EF will have negligible impact on the overall.
ED 146	Page 838: Continuation of incorrect values from previous table	Noted. This will be amended.
ED 147	Page 838: Most project specific mitigations have been included - however there could be more opportunities missed to reduce emissions - car transportation could be completed with EV, powered by renewable energy if a suitable wind turbine / battery storage was installed at the Navitas onshore site.	Navitas continues to explore emissions reduction opportunities and will do so throughout field life. Navitas will tender the provision of onshore vehicle transportation in due course. It is anticipated that prospective tenderers will be asked to consider electric transportation opportunities. However, close dialogue will be required with FIG to ensure that the municipal power generation can accommodate an increase in the number of electric vehicles. The situation will also be monitored as technologies advance and capacity increases through the life of field. In the meantime the EIA has assessed the worst case emissions anticipated, and therefore assumes that vehicles will be powered by traditional combustion engines. In the post consultation EIS Navitas will add a section under 10.9.7 or 10.9.10.1 on additional measures that may be investigated.

Reference	Representation	Navitas response
ED 148	Page 844: Why have other annexes not been included under 'relevant legislation'? Annex II - control of pollution by noxious liquid, Prevention of pollution by harmful substances carried by sea in packaged form, Annex IV - prevention of pollution by sewage from ships	These will be included.
ED 149	Page 844: The Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, the protocols of which apply to the onward processing of waste from the Falkland Islands to the UK. - The FI is not party to the Basel Convention - but has a bilateral agreement in place	Noted, this will be amended.
ED 150	Page 848: Ash generated from waste incineration (if the FIG incinerator is not operational and a temporary incinerator is required at the onshore base). - Ash will be generated whether from FIG incinerator or Navitas. If generated by Navitas incinerator what will happen to this ash?	As described in 10.10.2.2.2.1 'In the event that the new [FIG] facility is not completed in time, the project will provide a temporary portable incinerator and waste ash will be temporarily securely stored at the supply base and periodically sent back to the UK along with other waste returns.'
ED 151	Page 848: However, occasionally the recovered oil may be sufficiently 'off spec' that it will not be suitable for processing offshore and in these instances it will be collected and stored in drums / transit tanks and will be shipped back to the onshore supply base. What happens in this case, will they be taken back to the UK or left in the Falklands?	As described in paragraphs 3 and 4 of section 10.10.2.2.1, this waste stream may be a candidate for re-use, with incineration being another option. Alternatively, if 'off spec' oil is returned to shore due to malfunction on the MODU/FPSO, the waste would be stored onshore and then returned offshore for processing once equipment if fixed.
ED 152	Page 847: The EIS states that oily water will be treated as sewerage - will this actually go straight to sea as there is no sewerage treatment in the Falklands?	Onshore oily waste water will not go into the Stanley sewerage system unless under consent from FIG. Onshore operations which may result in oily water discharge will be completed in a bunded area which will contain the oily water, this will then be treated, incinerated or dealt with away from the sewerage network and shall align with Navitas' Waste Management Procedure. It is understood that the FIG Stanley Incinerator will be operational by end 2025. This aligns with Navitas' operational schedule. Should the FIG Stanley Incinerator not be available Navitas would: 1. Store the waste in suitable containers onshore until the FIG incinerator is once again available; or 2. Store the waste in suitable containers onshore until offshore treatment on board either the MODU or FPSO is available 3. Store the waste in suitable containers onshore until a suitable volume is ready for export under the Basel Convention to the UK.

Reference	Representation	Navitas response
		Waste oils from this process shall always ben candidates for re-use, incineration is a secondary solution.
ED 153	Page 848: The EIS states that more details on the oil spill waste clean-up and management will be detailed in Navitas' Waste Management Strategy. When will this strategy be completed?	Navitas has submitted a waste management procedure to FIG for review. The Preliminary OPEPs provide more detail on proposals for oil spill waste management.
ED 154	Page 858: The Environmental and Emissions Monitoring System (EEMS) is the environmental database of the UK oil and gas industry. The EEMS was updated in Feb 2024. Have the waste figures from 2013 been updated?	The EEMS data is no longer referenced in this chapter - this bullet will be removed.
ED 155	Page 860: Can the incinerator incinerate hazardous waste, aerosols, pipe dope, oily rags?	Following discussions with FIG it is Navitas' expectation is that the incinerator will be able to handle this type of waste. If FIG is no longer able to handle this type of waste Navitas would send these streams back to the UK under the Basel Convention regulations, in accordance with its Waste Management Procedure.
ED 156	Page 872: Marine Mammals are also protected under the Conservation of Wildlife and Nature Ordinance 1999 - this should be included	This will be added.
ED 157	Page 873: There have been collisions reported in the past - Caroline Weir (Falklands Conservation) has the information, and we suggest it should be included in the EIS	This will be added.
ED 158	Page 876: Inshore is a ratified KBA for sei whales and 9 seabird species	The KBA is covered in the baseline section (7.5.2.3.4), which is referenced in this section.
ED 159	Page 880: Falklands guidelines also exist - the cetacean code of conduct - should be included in EIS	This will be added.
ED 160	Page 881: Says highest number of vessels is during stage 2a/b, however the table shows 13 during this stage but 16 for stage 1. Statement does not add up	Noted, this will be amended.
ED 161	Page 881: There is no definitive data that populations of whales are increasing in the area therefore should be very careful in concluding that the loss of an individual animal would not have a long-term impact on the local population	This sentence will be removed.
ED 162	Page 883: Review of SMMO reports after 5 years. Why such a long wait for the review with the uncertainties over cetaceans interaction? Would a review after 2 years not be more appropriate in the first instance?	This will be revised to regular reviews with an in depth review every 5 years.

Reference	Representation	Navitas response
ED 163	Page 891: Mentions CBD - but references the old CBD Aichi targets, not the newer Kunming-Montreal targets that superseded them. Please update	This will be updated.
ED 164	Page 908: This section about biofouling says: In order to specifically mitigate the 'Upper Moderate' risk of species introduction via bio-fouling which is posed by the LTVs used as floating logistics barges, these vessels will be required to have a hull inspection prior to transport to Berkeley Sound and consideration will be given to hull cleaning, depending on the results of the survey. If hull cleaning is required, this would not be done in Falklands waters. Questions: will all hulls be cleaned before arriving in the Falklands? There is no information given about whether this will actually happen, who decides when to clean a hull and when not to clean a hull? How will this be decided, managed, monitored and recorded? Given the impacts that bringing invasive species could cause, would not ALL hulls need to be cleaned? These questions are important because the entire mitigation for this risk appears to be at the discretion of someone without any protocols around it.	The standard used will be appropriate and agreed in collaboration with FIG. Navitas will reference the IMO 2023 Biofouling Guidelines and Table 1 - Rating Scale for proposed actions in the post consultation EIS. Link
ED 165	Page 918: Mitigations for terrestrial invasive species rely heavily on the biosecurity management plan that exists but needs to be revised (and the EIS says it will be revised for this project). Therefore the EIS is scant on exact information about what mitigations will actually be done to address the risks. Whilst we appreciate that this is a work in progress and has been added to the 'to do list' for Navitas, nonetheless it means that the level of confidence for the risk assessment is not as good as it could have been if those actual mitigations were documented in the EIS. It could also include using the rat detector dogs that operate in the Falklands. Would be good to see this included as part of the mitigations.	The Sea Lion Phase 1 and 2 Biosecurity Management Plan will be developed after project sanction and prior to the commencement of operations. This will build upon the 2015 exploration Biosecurity Management Plan. The EMMP advisory group will be invited to review and input in to the draft Biosecurity Management Plan prior to its finalisation and issue. The intention is to bio-secure cargo at its port of origin. It will be inspected on arrival and any cargo considered deficient will be treated in a dedicated biosecurity area in the supply yard prior to release. Methods of inspection and remediation will be discussed and agreed with the EMMP advisory group and FIG Biosecurity prior to finalisation of the Biosecurity Management Plan.
ED 166	Page 966: Has there been consideration of impacts if Navitas cannot contract for the building of the transit style accommodation or for new builds that may need to occur for the permanent onshore staff? What would be the impacts if Navitas have to use the limited rental accommodation that exists?	If the local supply chain is unable to respond to the onshore accommodation contract opportunity, then Navitas can seek international contractors to fulfil the construction requirement. Socioeconomic impacts, monitoring and management will be discussed in more detail in the updated Sea Lion Socio-economic Impact Assessment.

Reference	Representation	Navitas response
ED 167	Page 974: There has been ongoing policy work surrounding housing. Is there more up to date information available than 2021?	FIG policy unit were asked and no update was available at the time (Q2 2024).
ED 168	Page 974: Severity has been categorised as minor; however, more than likely under the current housing climate it will increase to at least moderate.	The EIS can only assess the current situation but it is understood housing is a challenging issue and Navitas will do what they can to minimise impact. As the addition of accommodation required by Navitas is only 2 % change, the assessment looks at the worst case and is precautionary, Navitas feel the assessment is appropriate. Currently the assessment is sensitivity Low 'The receptor is tolerant of change without detriment to its character, or unacceptable to a handful of stakeholders' and Severity Minor: 'Short-term minor impact on livelihood and/or health, inconvenience of resource use, minor levels of disturbance to local pop, concern to a handful of stakeholders'. Wider aspects of the impact of the development on accommodation are considered in the SIA.
ED 169	Page 979: Most vessels will have water makers on board however any net deficit will be supplied at the TDF for domestic use- Will the ad hoc nature of demand of water requirements make planning for water difficult?	The trickle-feed buffer tank at TDF will help with this issue as there will be no large drawdowns of water from the FIG system but rather a gradual trickle which will be more manageable. There is also a need for appropriate planning by Navitas in terms of vessels' water requirements e.g. top up times/quantities, which will be managed by the onshore teams.
ED 170	Page 981: Two receptors by use of Stanley freshwater are human population and tangible property - what about the ecosystem catchment? If more water than is necessary is abstracted, this may impact the health of the catchment, however this is not included in the EIS	This section of the EIS focuses on the competition of a resource (water) for the human population. As such, the natural environment would not be considered a receptor in this case. The volume of water to be extracted from the natural supply is managed by FIG and Navitas will be one of many end users. Navitas are going to be taking water via a trickle-feed to minimise significant drawdowns on the system.
ED 171	Page 981: Impacts to local users may arise from increase in volume and rate of demand- also any significant reduction in rainfall patterns will have impact.	Noted, this will be included.
ED 172	Page 981: EIS stated that PWD are required to hold two days water supply in storage tanks - is this correct as we believe it is three days water supply?	This has been checked again with PWD who confirm 'there is theoretically enough to supply the town with 2.2 days, and including the water already in the network this could stretch to 2.5 days'. Suggest text is amended. to '2-3 days'
ED 173	Page 985: Pumping water to vessels - Has electricity to pump the water been factored into the emissions?	The onshore electricity generation usage has been included in the project's emissions calculations. This includes elecricity required to pump water to

Reference	Representation	Navitas response
		vessels. Navitas will add a footnote to table 10.66 in the post consultation EIS to ensure that this is clear.
ED 174	Page 986: Sustainable design - Will the supply base and accommodation units include rainwater harvesting for grey water use?	Tenderers will be asked to provide detail of their proposed incorporation of sustainable design features in their tender submissions. Environmental considerations and sustainable design will form part of the contract evaluation criteria. This detail will be included in the post consultation EIS.
ED 175	Page 986: Alterative to reduce demand of fresh water/ pumping raw water from catchment source rather than the water treatment plant - this needs to be carefully managed with the health of the surrounding ecosystem in mind, especially if average water demand from onshore centres and offshore assets ranges from 99.5-112.5m3 per day, and excess Stanley capacity is 82m3 per day.	FIG Public Works Department has indicated to Navitas that it intends to increase both water catchment and treatment such that the prognosed demand from Sea Lion will easily be accommodated within the prognosed increased capacity. Water demand and pressure on supply will be a matter for continuous monitoring between FIG and Navitas so that if issues are encountered measures to increase capacity/reduce constraints can be implemented.
ED 176	Page 995: Annual increase in water demand of between 2 to 3 % per annum - we have calculated that there will actually be a 3.5% increase.	Noted, this will be amended. and referenced as (FIG Environment Department, pers. comm.)
ED 177	Page 995: Monitoring of onshore water use - Will this be metered?	Yes, water usage will be metered as it was for previous drilling campaigns.
ED 178	Page 1006: Risk is remaining at 'upper moderate' - Concern that if the energy supply and new power station in Stanley is not significantly upgraded in time that increased demand will not be able to be met for phase 1 & 2.	Risk is assessed as 'Upper Moderate' as it is based on existing capacity - FIGs planned investment in the new power station has not been factored in to the assessment. The Public Works Department has advised that with its planned investment, Sea Lion-associated demands can easily be accommodated. In the event that FIG investment is significantly delayed, and there are capacity constraints, Navitas will rely upon standalone power generation for its onshore facilities until such time as increased municipal power generation is available. As such, it is not anticipated that the Upper Moderate risk will eventuate.
ED 179	Page 1011: Does this mean at the commencement of the project? If not, can existing flights meet requirements for personnel that will need to arrive in the Islands before drilling begins? Is there a provision for the dedicated charter flight to start earlier if needed?	Navitas acknowledges the limitations of existing air links and is monitoring progress with the provision of additional air links in regular consultation with FIG. Navitas will assess its anticipated seat demand and the capacity on air links prior to commencement of operations. If necessary, in consultation with FIG and MoD, ad hoc dedicated charter flights can be implemented prior to the commencement of drilling to meet Sea Lion development related demand and limit impact on other industry

Reference	Representation	Navitas response
		and the general community. This aspect will be discussed further in the socioeconomic impact assessment.
ED 180	Page 1019: EIS states that waste from the development will be disposed of at the FIG waste management facility at Megabid, and if these are not available then the waste would be incinerated at the supply base or shipped away to be dealt with in another country. Can you please confirm that this is correct?	That is correct. The anticipated wastes arising from Sea Lion was considered in the design and specification of the municipal waste facility. FIG's Public Works Department anticipates that this facility will be available in late 2025 which is prior to the commencement of Sea Lion operations. However, in the event that the municipal facility is significantly delayed, Navitas will temporarily store waste in a dedicated waste area within the onshore supply yards, and if the delay is prolonged has a contingency option to seek planning permission for the situation of a temporary containerised incinerator in the Supply Base facility. There is also the option to export waste for disposal elsewhere, as was undertaken in previous exploration drilling campaigns. This is covered in greater detail in the Waste Management Procedure which was issued to FIG in August 2024 (see ED 153).
ED 181	Page 1019: Section states that "the Falkland Island municipal waste facilities will become available in time for the project"; section 10.10 expresses confidence that this will be the case for the FIG incinerator; previous sections (such as those following) outline that FIG 'plan to build' a 'facility that is expected to be ready for operation in advance of Sea Lion development campaign' (5.11.1.2.2) (planned to be available 2024 according to section 10.10.4.2.3). While previous sections acknowledge that this may not be available at time of project (e.g. 5.11.4), and discuss the construction and use of own incinerator at base (e.g. 10.10.1), language and wording for this particular section is not wholly consistent in conveying that this is a probable scenario (however likely), but implies instead that construction of facility will have happened.	Wording will be checked for consistency throughout. It is Navitas' intention to use the FIG incinerator, which is anticipated to be operational by the time Navitas operations begin. In the unlikely case that the FIG incinerator is not available, Navitas will provide a temporary incinerator to deal with their waste until the FIG one is operational. See the response to ED 180 for further information if required.
ED 182	Page 1053: Livestock will be sensitive to helicopter flights, particularly when corralled.	Agreed, this is highlighted in section 11.9.1.1.3, last bullet point and 11.9.4.1.2.
ED 183	Page 1057: Flight path MPC to Stanley- Does this impact on local settlements (Bluff Cove and Fitzroy)? Could this section be travelled by car? Would this also affect the livestock going to FIMCO?	Yes, it is noted in section 11.9.6.1.1 that helicopter flights will pass over settlements and this is included in the assessment. The base case is to travel the MPN-Stanley section by vehicle (likely minibuses) but an option to move personnel by helicopter is included as a worst case.

Reference	Representation	Navitas response
ED 184	Page 1163: Benthic communities are not included in table 12.11. If there is no affect on it, should it still be included to show that this has been considered and it stated no impact on these?	Noted. Benthos will be included and stated as n/a. Other table will be checked to ensure consistency to indicate those receptors that are not included.
ED 185	Page 1084: Tests are planned for pelt and fur adhesion - when are these tests going to happen? Why do tests in water temperature of 18C when the seawater temperature is about 5 degrees C here in the Falklands? Have the same tests been carried out in water 5 degrees C, and if so, does this alter the results? This should be included.	Tests are planned for pelt and fur adhesion and commitment to undertaking these tests is included within the EMMP. These tests haven't yet been undertaken due to difficulties in obtaining the import permits that are required for the tests to be undertaken at the CEDRE laboratory in France. If the project achieves production consent and Final Investment Decision, efforts to secure import permits for the pelt and fur will be reinvigorated. In the event that this is unsuccessful, the contingency option is for the testing to be undertaken within the Falkland Islands. This will require the importation to the Falklands of testing equipment and Sea Lion crude samples. There are limited specialist laboratories for undertaking oil behaviour tests. The water at the specialist testing facility in France was 18 degrees C. The results of the testing at that water temperature can be considered worst case as at 5 degrees water temperature it is anticipated that Sea Lion crude would form a solid even more rapidly and be even less likely to sheen.
ED 186	Page 1196: This figure, in the first map (a) shows that there is a low probability of surface oil around Cochon and Kidney Island. However, the second map (b) shows a high probability of oil on the shoreline of Cochon and Kidney Island under scenario 1.	Although the scales are the same, the figures represent different model outputs.
ED 187	Page 1200: Regarding dispersants - would these be used in the Falklands? They can be harmful to the environment, does Navitas have policies for the use of dispersants?	Dispersants are not proposed as marine receptors such as kelp are likely to be more affected by the chemicals and dispersed oil than by the oil remaining on the surface, see section 12.2.4.1. Furthermore, permission to use dispersants would have to be granted by FIG.
ED 188	Page 1200: Is there a procedure to deal with oil spill clean up waste, how will this be stored or disposed of? Storage of oiled waste could also lead to contamination if not stored properly.	The preliminary OPEPs, which were issued by Navitas to FIG in August 2024, detail proposals for dealing with oil spill clean up waste. In the highly unlikely event that a spill incident should occur, Navitas would be supported by international oil spill response contractors who have significant expertise and resources in the appropriate management of oil spill response waste. These response contractors would be deployed to the Islands in the event of a Tier 2 or 3 oil spill event. There will be oil spill response and waste storage capability on the offshore support vessels

Reference	Representation	Navitas response
		(OSVs) and at the TDF (Tier 1) and in the onshore supply base facility. An appropriate dedicated bunded area for the storage of oily waste is planned within the supply base yard. Navitas will check section 5.11.4.4.1 and Sections 12.1 - 12.3 and add additional detail to the post consultation EIS as necessary.
ED 189	Page 1201: Why just highlight the south shore? This is slightly misleading as figure 12-46 shows there is a probability between 20-40% of onshore oil around large areas of Cape Pembroke which is known for shorebirds and marine mammals. All of Cape Pembroke is also a designated nature reserve.	Text will be amended.
ED 190	Page 1201: During calm weather, the oil would be amenable to recovery given the buoyant nature of the wax masses. What about other weather states - not very often it is calm in FI?	In the highly unlikely event of a spill to sea, every effort will be made to effect the recovery operations. However, as noted in the EIS, there are operating limitations in the deployment and recovery efficiency of the oil spill response equipment identified as suitable for the characteristics of Sea Lion crude (as there is with any oil spill response). The optimum oil spill response approach would need to be determined in real-time during the incident and the approach would be dependent on: - the short, medium and long-term metocean conditions and their forecast - the spill modelling and tracking data - the consideration of the nature and size of spill As detailed both in the EIS and the Preliminary OPEPs, laboratory tests (by CEDRE) indicate that, given the nature of the Sea Lion crude, allowing for weathering and natural dispersion (which would occur faster in worse metocean conditions, when response equipment could not be deployed) may often represent the optimal response approach. In summary, Navitas has: - Modelled numerous oil spill event scenarios - Committed to recover as much spilled oil as possible - Submitted its Preliminary OPEPs to FIG Most importantly, Navitas will operate within a regime and structure that should prevent the occurrence of such an incident happening in the first place.

Reference	Representation	Navitas response
ED 191	Page 1235: Cumulative impacts (or impact interactions) are not covered in depth in chapter 13. Two pages for cumulative impacts does not seem enough detail, it is paying lip service at best, especially when some receptors such as seabirds and marine mammals could be impacted in multiple different ways. We expect the cumulative risks to be considered in more detail.	It is acknowledged that meaningful assessment of cumulative impacts is difficult. However, a colour-coded matrix in Section 13 has been included to give an idea of residual risk for each receptor. While this may overstate the impacts for some receptors, this is felt to be in line with the precautionary approach of the EIS. Thought will be given on the most effective way to summarise the non-project activities which contribute to cumulative impacts on each receptor. This presentation will be included within Chapter 13 of the post consultation EIS and the title will be changed to 'Cumulative impacts and impact interactions'.
ED 192	General: Continuous environmental monitoring hasn't been mentioned, which would allow for an understanding of any changes within the local environment potentially due to O&G activity. Will this be included?	Environmental monitoring to be conducted is detailed in the EMMP. Daily monitoring will be done offshore on any discharges (e.g. chemicals, produced water, if being discharged at the time, exhaust emissions etc) and these are reported regularly to the Regulatory authority (if the UK regime is to be followed). Monthly, quarterly and annual reporting is also conducted.
ED 193	General: Multiple variables from chapter 7.3 that are mentioned such as Tom and TOC levels, PAH, metal toxicity should be routinely monitored during the life of the project	These metrics are included in the benthic sediment surveys, which are proposed every 5 years throughout field life. Navitas willupdate the text to ensure that this is clear in the relevant sections of the post consultation EIS.
ED 194	General: This may not come under environmental monitoring - however if IUCN status of species changes within the lifetime of the project - how would additional risk assessments address this?	This would be addressed in the 5 yearly revisions of the EIS.
ED 195	General: chapter 10.2 mentions disturbance of local populations due to helicopter flights. Will the number of flights be monitored - and surveys conducted to ensure the local bird populations are not affected?	Number of flights will be recorded. Baseline data and ongoing monitoring of noise will be conducted and all complaints monitored, see section 15.6.2.2.1. Surveys of local bird populations are not proposed as the assessed impact does not trigger the need for a monitoring action.
ED 196	General: What baseline data would be needed to be collected to be able to identify impacts of the project when it started? E.g. temperature, salinity, conductivity, presence of metals, suspended solids, etc. this needs to cover all seasons for multiple years to account for natural variability. Would also be useful to know the baseline composition of the	Please see Chapter 7 of the EIS for baseline data at the field. Also there will be Remotely Operated Vehicle (ROV) surveys at each drill centre prior to the commencement of drilling.

Reference	Representation	Navitas response
	communities at the drill locations to be able to identify the impact and regeneration of the community to look at impact but also inform the EIA for decommissioning of the oil field	
FC 1	The International Energy Agency has stated that no new oil and gas fields should be opened if we are to achieve net zero emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit, avoiding far more severe climate change effects on wildlife, ecosystems and people, including for the Falkland Islands. Opening a new oil field in the Falkland Islands would not align with this, therefore Falklands Conservation (FC) cannot support the proposal laid out in the Environmental Impact Statement (EIS).	Please refer to RSPB 7.
FC 2	The presented EIS is not fit for purpose FC believes the EIS sets out an avoidable and clearly environmentally damaging development proposal that is inconsistent with the Government's objective to 'reduce our carbon emissions, in order to ensure we act as a responsible global citizen' (Islands Plan 2022). The EIS is an incomplete update to previous submissions. It remains inadequate in meeting key requirements of EIA process. It provides an incomplete picture of the risks to the Falklands environment. A major shortcoming is the failure to provide a firm commitment to offsetting all carbon emissions: the 9 million tonnes produced during the development and the more than 100 million tonnes from burning of Falklands oil. EIS statements regarding local offsetting guarantee nothing, are likely unachievable, and could easily be viewed as climate-washing. The EIS contains significant data omissions and errors. Key data, highlighted as required 10 years previous have still failed to be collected, existing data have not been included. Two sections looked at in detail, though not exhaustively, contain over 100 errors, omissions or uncertainties. These put Falklands and other globally significant wildlife at risk. FC believes the current EIS confirms a corner-cutting approach, which unnecessarily results in environmental and reputational impacts for the	Navitas refutes the assertion that the EIS has cut corners - it represents 14 years of investment in data acquisition, analysis, stakeholder engagement etc., in order to assess environmental risk and impact and shape the Phase 1 and 2 development so that residual risks and impacts are ALARP. Navitas notes that independent assessment of the EIS by leading UK industry bodies compliments the structure and content of the EIS, use of data and approach to data gaps. The JV [POEPL (now NPDP) and Rockhopper Exploration] has invested significant sums in data acquisition to inform this EIS and via FIPLA has contributed to the GAP project. It has also committed to additional data acquisition in advance of commencement of operations in order to validate the risk assessment. The FIG EIA Guidance states that 'data gaps do not make an EIS unfit for purpose as long as these are acknowledged and explained'; it is how they are treated in the risk assessment that is important (sections 3.13 and 3.18 of the guidance refer). Navitas believes that where data gaps remain the EIA has been considerably precautionary, and residual risk reduced to ALARP. Some of the identified data gaps are beyond the capability of an individual operator to fill. With regard to seabird data, for example, the EMMP

Reference	Representation	Navitas response
	Falklands community, and one which has limited meaningful commitment to mitigating key environmental harms.	workshop report (April 2019) notes that 'Challenges to the adequacy of data were raised during the EIS public consultation and were reiterated in the EMMP workshop. The workshop agreed that it would be useful to collect further data opportunistically from vessels associated with the Sea Lion development, but that a wider data collection effort to update seabird information was beyond the scope of the EMMP. It was also decided not to monitor seabird populations ashore due to the difficulty of attributing any change to activities in the Sea Lion field.' Globally there is no precedent that a developer will offset emissions from sold product (please refer to response to DMR 288).
FC 3	The current legal framework is incomplete for good environmental governance In conjunction with the above concerns, FC believes that Falkland Islands Government (FIG) has not made the promised progress in three key areas of environmental legislation that would help ensure that environmental impacts are minimised and would therefore help guide any Environmental Impact Statements to best practice standards. These were 'polluter pays', updated wildlife ordinance and 'environmental case' legislation. The lack of any identified key marine features such as Marine Protected Areas and Vulnerable Marine Ecosystems, and associated protective policy is a significant weakness for risk assessment, decision-making and protection of the marine environment. There is risk that many new oil projects could become uneconomical before the intended project end-date. The lack of an early commitment to how decommissioning would happen in an environmentally sustainable manner is therefore a critical omission. If FIG gives a green light to this Environmental Impact Statement that does not meet best practice standards and before legislation is put in place, it makes the legal reliability of the agreement uncertain in case of any infringements and puts the government at risk of being sued if trying to impose standards later.	Navitas has submitted the Field Development Plan (FDP) and Environmental Impact Statement (EIS) in accordance with FIG's current legislative framework. Navitas continues to work with FIG and its key contractors to ensure that its arrangements are aligned with industry best practice and FIG's planned changes to legislation. On decommissioning, please see response to DGN 3. Navitas expects that FIG will comment separately on the EIS public consultation representations which cover FIG's Oil Readiness and planned legislation.

Reference	Representation	Navitas response
FC 4	Recommendation FIG should not sanction unnecessary environmental impacts caused by a corner-cutting development proposal, under high-risk and inadequately legislated circumstances. Determining an EIS of this quality would be to endorse low standards and commitment that delivers a poor outcome for the environment and the community. The EIS should be re-submitted only once key gaps have been filled, errors addressed, and standards met.	Navitas notes the comment and opinion. Navitas continues to work within the legislative framework provided by FIG and has delivered amongst one of the industry's most comprehensive FDP and EIS. These have resulted in many environmental impact reductions including a reduced carbon intensity per barrel from the previously accepted EIS. Post FID / sanction, further environmental research / data collection will continue and validate the EIA's precautionary assessment and inform the EMMP. Navitas expects FIG to comment separately on the EIS Public consultation representations which cover FIG's oil preparedness and legislation.
FC 5	1. Carbon emissions and lack of commitment to offsetting The EIS lists CO2 emissions from oil production at approximately 9 million tonnes (p.825). Emissions from the burning of Falklands Sea Lion field oil (a legitimate inclusion in the Statement1) are listed as more than 150 million tonnes if production were to be maximised. The developers have also indicated that further development phases could more than double production of Phases I and II. These are very large amounts of CO2 that would launch a major increase in national carbon pollution and would make the Falkland Islands the highest per capita carbon emitting country in the world – but could be avoided as offsetting is a viable option right now. Comments regarding local offsetting guarantee nothing and are likely unachievable. FIG Guidance2 requires that mitigation and off-setting measures 'should not be hypothetical or unrealistic'. The EIS currently fails to provide a realistic and firm commitment to offsetting all carbon emissions and is inconsistent with FIG guidance. There needs to be a solid commitment in the EIS to offset all emissions. The EIS does not set out how the development will increase emissions in comparison to other local sectors, or the Falkland Islands national figures, as stated as required in FIG Guidance3. A comparison with UK budgets and emissions is neither in line with this guidance or consistent with use of UK comparisons in the rest of the EIS. At over approximately 60% of Falkland Island's recent annual emissions, the	Navitas' issued the Carbon and Biodiversity Fund strategy to FIG in August 2024. In this paper the company's offsetting strategy has been detailed; this will be further discussed with FIG should the development be sanctioned. Local carbon and biodiversity offsetting opportunities require further evaluation and research to define the level of offsetting that can be achieved. This too is discussed at length with the strategy paper. Navitas is committed to follow FIG legislation, policy and guidance. Emissions are compared to Falkland Island's emissions in the EIS, see section in 10.9.

Reference	Representation	Navitas response
	proposed development has an enormous and significant national impact. FC is concerned that the current approaches contradict FIG guidelines, good environmental assessment principles and global commitments, while also having negative reputational impacts for the Islands. Given that the amount of carbon emissions is presented as small in global terms, it is even more important that FIG ensure a real and viable commitment to offsetting all emissions within the EIS.	
FC 6	2. Impacts on our wildlife and data gaps There still remain many gaps in information in the EIS – a number of these are acknowledged within the EIS itself. For such a major proposal and for a robust assessment these should be filled prior to the determination of any EIS, as is consistent with good practice, and to avoid significant risks to environmental features and processes. These are critical, given the Falklands economy is underpinned by a healthy environment. Data gaps include those on invasive species risk, bird strike, waxy oil implications for pinniped fur and cetaceans, impacts on benthos, as well as seabirds and cetaceans:	As noted in the April 2019 EMMP workshop: 'The workshop agreed that it would be useful to collect further [seabird] data opportunistically from vessels associated with the Sea Lion development, but that a wider data collection effort to update seabird information was beyond the scope of the EMMP.' Monitoring is included in the EMMP and this aims to fill gaps and confirm (precautionary) EIS Assessments once the project is sanctioned. In addition to the above response, please also refer to the response to FC 7.
FC 7	Seabirds The Falklands supports globally important breeding populations of penguins, albatross and prions during the breeding season. However, a much larger diversity of seabirds has been recorded in Falklands waters than simply breeds. Seabirds can be extremely wide-ranging, particularly during winter migrations and consequently, birds from colonies hundreds or thousands of kilometres away occur in Falklands waters and could be at risk from the development proposals. These can include those of conservation concern such as the 'Vulnerable' wandering albatross including those from South Georgia, the 'Endangered' Atlantic petrel from St Helena, Ascension and Tristan, and the 'Vulnerable' southern royal albatross from NZ which have all been sighted in the Falklands even close inshore - however, the potential range of species at risk is much larger. The EIS identifies that seabirds are at risk from a number of impacts, including oil spills and bird-strike. In order to determine which seabirds could be at risk and how to avoid or mitigate such risk, up-to-date	Navitas has aligned its EIS with the FIG EIA Guidance, which states: data gaps are to be acknowledged in the assessment and the risk assessment should be precautionary where there are data gaps. The EMMP commits to Seabird and Marine Mammal Observation in the Sea Lion area for an initial 3 years to validate the impact assessment. Attendees at the EMMP workshop (April 2019) agreed that 'A wider data collection effort to update seabird information was beyond the scope of the EMMP.' It is not reasonable to expect an individual operator to fund and undertake a seabird data survey on the area wide scale and for the duration that would be required. However, as is specified in Section 10.1.10.1, 'Offshore, Navitas will use independent Seabird and Marine Mammal Observers (SMMOs) on support vessels and investigate the possibility of a collaborative survey with FIFD, potentially using the fisheries patrol

Reference	Representation	Navitas response
	baseline data on the total range of seabirds that utilise potentially impacted areas are required. Species-focussed approaches, such as tracking studies, are no substitute for this all-inclusive baseline data4 as they inform on only those species, life-history stages and locations tracked. Neither are they an effective way to track changes in the use of the site by a changing seabird assemblage over time. The approach to delivering useful seabird data therefore needs to be area-based boat or aerial surveys, with a survey method that will provide appropriate representation of the diversity and abundance of all seabirds using the risk area. The only presented seabird data of a broadly appropriate type in the EIS is more than 20 years old. It is well-known that climate change is rapidly changing the distribution of seabirds and their prey at sea. Good practice in places such as the North Sea would expect data to be collected within five years. Projects are expected to provide comprehensive data on bird distributions and movements over a two-year period at considerable cost, before submitting consent applications. This is done ahead of projects being approved, and with all the associated risks of having to change the development. We would consider that this Environmental Impact Statement has cut corners in this potentially expensive but essential aspect of data collection. The consequences of a lack of appropriate data are strongly evident in the assessment of risk to seabirds in the EIS, these include: • Superfluous referencing to data that are not subsequently used, or analyses that could occur, but do not; • Acknowledgement of data weaknesses and data gaps that could have been addressed, but have not; • Inconsistent and inaccurate representation of data and analyses that are included; and • Unjustified and contradictory argument for use of data sets that are too old and do not follow good practice. Further detailed comments on these points are included in Appendix 1.	vessel as a platform. A seabird distribution monitoring programme will be developed over several years with an understanding of ongoing work and in collaboration with FIFD, if possible. This will cover the offshore area, transit zones and targeted onshore colonies. Dedicated seabird observers will be deployed offshore during any initial well test and commissioning flaring to quantify any impacts.' As indicated in the EMMP workshop report 2019, the summary tables will be further developed post-sanction in consultation with an appointed advisory group.
FC 8a	Cetaceans The Berkeley Sound development area is proposed to operate within	Chapter 7 is based upon the peer-reviewed papers that are in the public domain. Published papers related to the FC work in Berkeley Sound over

Reference	Representation	Navitas response
	critical sensitive whale habitat. The extent of the global importance of these areas for whales has not been recognised through the omission of large whale datasets in the EIS. Important Marine Mammal Areas (IMMAs) have been designated for endangered sei whales and for wintering southern right whales. Such non-statutory designations of sites should be a standard part of any EIS that wishes to determine adequate risk categories and suitable mitigation e.g. how to adapt operations for animals engaged in sensitive behaviours including feeding and mating within Berkeley Sound. Information on whale distribution, movements, seasonality, behaviour, habitat, site fidelity, conservation status and population trends are provided in the supporting evidence for these IMMAs, almost none of which has been used to recognise the extent of whale sensitivities in the EIS which should be changed to Very High sensitivity. The EIS risk assessment relies on the identification of 'Key Environmental Sensitivities', and the sensitivity assessment is based on criteria including conservation status, critical habitat, seasonality, vulnerable parts of a species lifecycle etc. Consequently, it is essential to correctly identify and consider the latest available information on those Sensitivities. Eight years of data, primarily for sei whales and southern right whales in Berkeley Sound, has not been appropriately represented in the EIS. In addition, erroneous findings from early studies are perpetuated (e.g. that Berkeley Sound is a fin whale hotspot). The importance of nearshore Falklands waters for wintering southern right whale aggregations has been almost completely omitted from the EIS. Offshore: information on the offshore occurrence of cetaceans that would facilitate a robust assessment of the Key Environmental Sensitivities at the Sea Lion field is largely lacking. Efforts have not been made to implement offshore cetacean surveys as an environmental baseline assessment ahead of production commencing. However, a potentially useful year-round dataset was collected. Only 5% of this appears to have been fully analysed and used to inform the EIS.	the last eight years have been referenced, except for those from 2023/24 which will be added. Navitas recognises that there are metadata records in the data portal based on the work that is referred to here, however Navitas do not have access to the primary data so that it can't effectively be used for analysis. The IMMA detail will be updated in the document and Navitas will amend the text with new data where appropriate. Please note: the respondent was specifically invited to a dedicated scoping session (see Navitas emails 17th and 27th November 2023) with a view to discussing sensitivities and to explore available data to inform the assessment, but the invitation was declined. Please note: Given the limited extent of project activity in Berkeley Sound (the elimination of inshore ship-to-ship crude oil transfers from the Field Development Plan (FDP)), it was previously agreed that 'four impacts (oil spill effects on inshore seabirds, effects of underwater noise on marine mammals inshore, effects on squid spawning grounds and effects on intertidal/nearshore benthic habitats) were considered by the workshop to be now outside the scope of the EMMP. ' (EMMP Workshop Report 2019). Please note: It is not practicable for a single operator to implement offshore cetacean surveys pre-sanction of the development. Please refer also to RSPB 3. Efforts have been made to acquire data to inform the assessment. The comment itself acknowledges that a year round dataset that was specifically commissioned to inform the environmental baseline assessment for the project. Furthermore please note that ahead of production Navitas has committed to employ SMMOs on vessels operating between the Falkland Islands and the Sea lion Field for three years pre first oil. In addition, further acoustic

Reference	Representation	Navitas response
		work will be conducted. Regarding the comment on 5% of the year round dataset being used, please refer to Comment FC 129.
FC 8b	Whale entanglement risk: there has been little recognition of the risks of cetacean entanglement in mooring equipment in the EIS. Foraging sei whales, that use subsurface lunge feeding, and breeding southern right whales in Berkeley Sound are vulnerable to entanglement, potentially leading to mortality by drowning, unrecoverable injuries, or subsequent infections. Offshore cetaceans can also become entangled.	Thank you for the comment. Of note, Berkeley Sound is not a development area. It will only be used as an anchorage area for two LTVs over a cumulative (and non-consecutive) period of 13 months. These are expected to take up 0.004% (excluding the exclusion zones) of the area in Berkely Sound. The LTV and FPSO anchor chains are large gauge (> 2 inches) and will be taut and therefore unlikely to lead to entanglement. Based upon a literature search, most cetacean entanglement is in relation to static fishing gear. Nonetheless, a risk assessment for entanglement inshore and offshore will be added to Chapter 10.11.
FC 8c	Vessel collisions: the sections on vessel collisions make no acknowledgement of the existing Code of Conduct (endorsed by FIG) for the Falklands which provides guidance on suitable speeds, wide berths etc for avoiding injurious/fatal collision with cetaceans. Small cetaceans have been omitted despite local documented mortalities of dolphins from vessel strike. With regard to nearshore wintering southern right whale aggregations, reducing the risk of vessel collision would benefit from an expanded 'reduce vessel speed' (10 knots) zone between 1 June and 31 August to 10 km from the coast to match the IMMA and telemetry data showing highest-use habitats. This would greatly improve confidence that the vulnerable surface groups of mating southern right whales - which occur out from the coast - would be at lower risk of a fatal collision, and would be a better all round mitigation approach than only the use of visual observers (given there are 16 hours of darkness in winter).	Navitas fully commit to the Code of Conduct and this will be stated in the text. Small cetaceans will be added to the risk assessment. Navitas agree that speed restrictions are the most effective mitigation against vessel collisions with marine mammals and in the EIS propose reducing speed to 10 knots at the pMMA boundary (as industry standard mitigation (Section 10.11.5)) and then 8 knots within Berkeley Sound (as project-specific mitigation (Section 10.11.7)). Navitas will also commit to reducing speed to ≤10 knots in Port William. Please also refer to FC 188 and FC 162. The IMMA boundary has not been proposed as the limit for the speed restrictions as it is not a statutory boundary and the boundary may change over time.
FC 8d	Information provided in the EIS indicates that the risk of injury/mortality to cetaceans from noise is negligible in both the offshore and Berkeley	The EMMP workshop determined that effects of underwater noise on marine mammals inshore 'were considered by the [EMMP] workshop to

Reference	Representation	Navitas response
	Sound environments. However, concerns remain about behavioural impacts, given the lack of data on cetacean residency (exposure time) in the Sea Lion field and the non-conservative approaches used in the EIS. The semi-enclosed waters, seasonally-high existing noise levels, and known importance of Berkeley Sound for feeding sei and mating right whales, raises concerns over the cumulative impacts of noise from moored vessels on whale behaviour and use of the Sound.	be now outside the scope of the EMMP' due to the elimination of inshore ship-to ship crude oil transfers from the development plan. Nonetheless Chapter 10.5 is being revised. Please see also FIFD 54. In addition Navitas will employ SMMOs on vessels operating between the Falkland Islands and the Sea lion Field for three years pre first oil. In addition further acoustic work will be conducted.
FC 9	3. Environmental commitments and Falkland Islands legislation Commitments The Environmental Impact Statement presents a set of very significant environmental impacts, and it is therefore necessary for MLAs to compare policies and commitments that have been undertaken. We believe that the impacts are inconsistent with several key commitments: The Islands Plan 2022-2026: • "We will carry out work to measure and reduce our carbon emissions, in order to ensure we act as a responsible global citizen." (p. 8) 5 Falkland Islands Environment Strategy: • "Vision 2040: Renewable energy has been embraced, we play our role in tackling the climate emergency, and are able to understand and adapt to global change at a local level." (p.18)6 • "Our Strategic objectives: to reduce our carbon emissions through transitioning to using renewable (low carbon) energy sources for power generation" (p. 7)6 • "Our Strategic objectives: to conduct the extraction of non-renewable resources, including any hydrocarbon development, in a way that values and conserves our unique biodiversity and ecology, supported by effective regulation" (p.8)6	Thank you for your comment. Navitas continues to work within the legislative framework provided by FIG. Navitas expects FIG to comment separately on the EIS Public consultation representations which cover FIG's oil preparedness, policy and legislation.
FC 10	Falkland Islands laws and policies are not 'oil-ready' FIG should have put in place rules before an Environmental Impact Statement. For good environmental protection and for Environmental Impact Assessments to work to the best standards, it is important to have a consolidated set of policies and laws to identify what elements of the environment should be protected strictly or to lesser degrees, and how projects can operate within the law. It is also important, so that if rules	Navitas expects FIG to comment separately on the EIS Public consultation representations which cover FIG's oil preparedness, policy and legislation.

Reference	Representation	Navitas response
	are infringed, reliable court challenges are possible. This is important for MLAs to know that they are making safe decisions when consenting projects – but also for potential investors in projects in order to see if their investments are safe. Before 2020, FIG recognised this and committed to updating standards in: • the Conservation of Wildlife and Nature Ordinance 1999 7 • establishing clear liability rules for polluters • introducing a form of technical environmental protection rules called 'environmental case'. Regrettably, none of these standards were completed before the Sea Lion Environmental Impact Statement was submitted. If MLAs give a green light to the Environmental Impact Statement before legislation is put in place, it makes the legal reliability of the agreement uncertain in case of any infringements and puts the government at risk of being sued if trying to impose standards later. The lack of this environmental framework means that international standards, as would be found in jurisdictions such as the North Sea, would be unable to be adopted. For example, there is a lack of national habitat categorisation and prioritisation in Falkland Island waters (equivalent to EU Habitats Directive, OSPAR and other UK categorisations). This makes it difficult to attribute value and risk to different sites and therefore suitable mitigation proposed.	
FC 11	4. Decommissioning and spill risks Several studies have called into question how long certain oil developments can continue if the world is to meet international climate change goals which restrict warming to below 2°C. If these studies are correct, then there is a risk that many new oil projects will become uneconomical after a period of time. It is therefore important that the Sea Lion Environmental Impact Statement include decommissioning commitments up front with consent for the project. Commitment to clean and environmentally friendly decommissioning of the Sea Lion project is essential to avoid the 'cheapest option' being chosen once the economics have been agreed upon. This would avoid potential problems like those	Navitas is committed and legally obliged to fund and conduct decommissioning under Falkland Islands legislation. Navitas will have arrangements in place to secure funding for any early or end of field life decommissioning and these arrangements need to be agreed with FIG prior to field development approval being granted. Navitas has prepared and submitted its preliminary (Pre-FID) OPEPs to FIG for their review and approval. These shall be finalised prior to the commencement of operations. Navitas is committed to mitigating the risks of such an event from occurring.

Reference	Representation	Navitas response
	which have been seen with the decommissioning of Stanley's existing polluted barge port (FIPASS). Spills are a key risk to the environment. Whilst there is commitment to an Oil Pollution Emergency Plan (OPEP) there is insufficient information presented within the EIS on the nature of oil impacts and the wildlife likely to be impacted. Furthermore, any OPEP should be properly financed by the developer and that liability should not be passed to Falkland Islanders as part of the National Oil Spill Contingency Plan, which by its very nature is limited by local resource.	Navitas is committed and legally obliged to demonstrate that it has adequate arrangements funding / insurance in place to fund any oil spill response activities and any environmental remediation and to compensate for adverse impact on the Falklands economy (including fishing and tourism) that would arise in the event of a worst case spill event. In August 2024 Navitas submitted the 'Financial Liability Assessment for Oil Spill' to FIG for their review / approval. NPDP (formerly PEOPL) has invested significant resources in understanding Sea Lion crude behaviour and the metocean environment in order to predict the potential impacts on wildlife and inform optimum spill response equipment. Spill Response will be supported by specialist oil spill and wildlife response agencies with resources (equipment and manpower) available to respond at very short notice. The oil spill response arrangements are not reliant on the NOSCP and associated resources. The preliminary OPEPs have been prepared in order to interface appropriately with the NOSCP (as required and stipulated in the NOSCP) and Navitas has committed to regular engagement, training and joint spill response exercises with FIG to ensure that a spill response can be effected appropriately.
FC 12	The risk analysis for seabirds is confusing and superficial, and the type of data ultimately considered and analysed for the purpose of this risk assessment is inappropriate for several reasons: (1) The EIS refers to several data that are not actually considered any further or are referred to as "additional analyses could be undertaken". This is misleading and makes it difficult to assess what information was actually used and how for the purpose of informing this EIS. (E.g. SAST data collected between Falklands and South Georgia 2003-2005, data from DPLUS139, data from Global Procellariiform Tracking Database and "its recent extension to penguins and other seabirds"). A similar approach is seen elsewhere in the EIS, e.g. in regard to zooplankton work which is yet to be conducted. (2) The EIS refers to the 3-year data collected in 1998-2001. However,	1) These data were collected through GAP and used in the EIS. They were used to compare tracking data with the White et al (2001) vulnerability maps. Note that the availability of tracking data is continuously evolving with regards to local projects. 2)There were three years and some of the latter year's data were used to inform more inshore areas. 3). Data gaps are acceptable as long as they are treated appropriately in the assessment. In other words, the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they address the gaps in the assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained. When carrying out the risk assessment data gaps have been taken into account. The EMMP workshop

Reference	Representation	Navitas response
	the vulnerability index taken from Webb et al. (2001) is actually based on only 2 years of these data. This detail is, misleadingly, not highlighted in the EIS. Best practice advice for oil & gas developments asks for a minimum of three years of data (Webb et al. 2014). (3) Data gaps are acknowledged but are not addressed (e.g. lack of seasonal and age-specific information from tracking data). (4) The EIS and previous responses to public concerns argue the suitability of the old ESAS data by referencing the independent review undertaken by Genesis (2017). However, a quick read of this report reveals a series of poorly supported and biased arguments with contradicting, distorted or incomplete information, and with key literature altogether missing. This superficial review process severely undermines the integrity of this EIS. a. Genesis (2017) did not conduct a power analysis to assess the suitability of the data to determine whether sufficient data exist to enable adequate baseline characterisation and robust assessment of changes that could arise should the project be approved. b. In regard to the suitability of the age of the data, the review compares the situation with UK examples, which are actually based on larger and more recent temporal extent and of more complete coverage. For example, Kober et al. (2010) used data from 24 years, and as recent as 6 years prior to analysis, compared to Falklands with 2-3 years of data, as recent as 23 years ago; "other projects" in the Atlantic Frontier (projects not specified in review of EIS) using data from 1979 – 1997. Modern developments actually use (boat-based) data from between 1980 – 2018 (see e.g. Rosebank EIS). c. Genesis (2017) distorts the information provided in Webb et al. (2014) with regards to data suitability. Webb et al. (2014) clearly state that surveys of less than 15 years old and certainly no more than 20 years be used to assess the sensitivity of seabird concentrations to oil pollution. d. Webb et al. (2016) was not considered in the review or the EIS. (Webb et al. 2016, Sensitivity of offshore seabird concentrations to oil pollution around the United Kingdom: Report to Oil & Gas UK). This report refers to data suitability in terms of age and highlights why tracking data	agreed that it would be useful to collect further [seabird] data opportunistically from vessels associated with the Sea Lion development, but that a wider data collection effort to update seabird information was beyond the scope of the EMMP. It was also decided not to monitor seabird populations ashore due to the difficulty of attributing any change to activities in the Sea Lion field. 4) The SAST data are dated and are acknowledged as such. Data collection from SMMO observations is planned for three years prior to first oil. a) All acknowledge that this data set is old but it does inform the base line and the UD from tracking work overlaps well with SAST data. The available data is considered sufficient for the purposes of the risk assessment. The SAST data was a collaboration between FIG and industry in terms of funding and delivered by JNCC in conjunction with FC. Navitas would refer to the EMMP with regards to further data collection in the area pre first oil. It is not possible, practical or appropriate for a single operator to undertake this work pre-sanction. 5) Navitas has acknowledged the age of the dataset consistently and has agreed to collect more vessel based data as the field is developed, 3 years prior to first oil. This is referenced in the EMMP, but the point will be strengthened in the post consultation EIS. Navitas has considered the age of the data in the EIS narrative. As a consequence of the age of the data, additional data acquisition was funded by FIG and industry under the GAP project and these additional data that has shown similar distributions for the species that were tracked to the SAST data suggesting that these data are complementary and the distributions still valid. The EIS discusses the static features that produce oceanographic patterns. Specifically this relates to the importance of the Patagonian Shelf around the Falkland Islands as foraging habitat for seabirds and marine mammals and static ocean features that are associated with enhanced primary productivity. On 6) To update the seabird vulnerability maps would require further area wide at sea data collection. This would have to be at the least to the scale of the northern FICZ/FOCZ to ensure that the coverage captured communities' structure and their dynamics at appropriate scale. The

Reference	Representation	Navitas response
	cannot act as a substitute for at-sea data. (5) Important information provided by Genesis (2017) in relation to data suitability and data gaps was ignored in the EIS and in responses to public concerns. Cherry-picking of information by the authors of the review further undermines the integrity of this EIS. E.g. Genesis (2017) states: "Pollock & Barton (2006) recommended that data over 20 years old should not be used for assessment purposes." The review also hints at Webb et al. (2014) recommendation, albeit in an incomplete and distorted fashion. Neither reference can be found in this EIS. b. Genesis 2017 expresses the need for updated boat data in particular for information on risk areas in case of an oil spill. This recommendation has not been considered in the EIS. c. Genesis 2017 states, "The seabird data collected in the Falkland Islands is less than 20 years old and therefore considered suitable for EIA and oil spill sensitivity purposes. However, it is noted that the data obtained from boat-based surveys in the Falkland Islands is becoming older and its suitability for assessment purposes may become less reliable in future years." This information has not been considered in the EIS. (6) This EIS has made no attempt at an updated, integrated analytical approach for refined seabird vulnerability assessments. Instead, the EIS simply reproduces the vulnerability maps produced by White et al. (2001) (which are based on 2 years of data and using an outdated method (see Webb et al. 2016) and reproduces figures from Baylis et al. (2019) and (2021) which portray the results of predicted habitat use, which is different to a vulnerability assessment. Since 2001, there has been significant progress in the statistical approaches available for seabird vulnerability assessments, with more powerful methods now in use (see e.g., Webb et al. 2016; Waggitt et al. 2020).	appropriate spatial/temporal scales would need to be informed by statistical analyses. What we can see from the GAP project is that the seabirds that were tracked show similar distributions and utilisation as the SAST data, so the vulnerability maps are considered appropriate. However it is acknowledged that the dataset is old. Navitas will be collecting additional data in the vicinity of the Sea Lion field. As stated previously, area wide data collection was considered beyond the scope of an individual operator and will require a FIG-Pan industry collaboration; an initiative which is considered needs to be coordinated by FIG. The EIS states 'Offshore Navitas will use independent Seabird and Marine Mammal Observers(SMMOs) on support vessels and investigate the possibility of a collaborative survey with FIFD, potentially using the fisheries patrol vessel as a platform. A seabird distribution monitoring programme will be developed over several years with an understanding of ongoing work and in collaboration with FIFD, if possible. This will cover the offshore area, transit zones and targeted onshore colonies. Dedicated seabird observers will be deployed offshore during any initial well test and commissioning flaring to quantify any impacts.' (Section 10.1.10.1).
FC 13	EIS: "the level of confidence in the assessment was used to inform the monitoring requirements for each potential impact / risk". FC: We understand that this informs monitoring requirements. However, it's less clear as to whether confidence level impacts the risk level provided. How can a risk be assessed with no data?	In the absence of site-specific data, where data gaps exist, the sensitivity of receptors and the severity of effect can be generically estimated using published and grey literature as well as prior personnel and industry experience. However, the fact that there is no site-specific data needs to be taken into consideration and is reflected in the confidence assessment

Reference	Representation	Navitas response
		which then alerts the need for further monitoring and data collection. Similarly, with regard to risk, the likelihood of an unplanned event occurring can be estimated using industry statistics but where there is any uncertainty in the fine details of the development, this is also reflected in the confidence assessment. Therefore, while the data gaps are considered and acknowledged when determining the sensitivity and severity, they are also reflected in the level of confidence thus ensuring appropriate monitoring is in place to ground-truth the EIA and inform additional mitigation/restorative efforts where necessary. The approach is intended to be precautionary.
FC 14	EIS: "POEPL commissioned SAERI to conduct a series of four seasonal coastal bird surveys in and around Berkeley Sound, which were carried out between February 2016 to May 2019. In the course of these surveys, the opportunity was taken to develop an initial shoreline classification index specific to the Falkland Islands for use in oil spill planning." FC: Tides and time of day, which significantly impact species number and types, were not considered. A baseline survey should be repeatable and allow detectability of change. However, this survey design fails in this aspect, due to the varying temporal and tidal conditions likely to be encountered at any particular season. At the very least, 3 years of seasonal data should be collected, as is the recommended period for seabird data.	Please note that this work was conducted when POEPL was considering inshore transfer which is no longer proposed. Navitas consider this data sufficient for the much smaller operations now proposed in Berkeley Sound (two vessels moored for a non-consecutive period of 13 months).
FC 15	EIS: "the baseline here was generated from extant literature" FC: Extant literature is practically non-existent, and this area is extremely data poor, as highlighted also by Van der Grient (2022). Also, up-to date references should be included, such as to highlight the importance of lobster krill to higher predators (incl. Baylis et al. 2014; Kuepfer et al. 2022; Kuepfer et al. 2023).	Regarding extant literature, 7.4.1.3.1 includes the following references: (Harrison- Matthews, 1932; Arkhipkin et al., 2001; Arata and Xavier, 2003; Laptikhovsky and Arkhipkin, 2003; Laptikhovsky, 2004; Clausen et al., 2005; Brickle et al., 2009; Michalik et al., 2010; Quillfeldt et al., 2011 and P. Brickle, pers. obs.). (Mouat et al., 2001; Agnew, 2002; Brickle et al., 2009) (Arkhipkin and Laptikhovsky, 2013). Padovani et al. (2012) (Tarling et al., 1995; Boltovskoy, 2000) (Agnew, 2002). Navitas will modify sentence 'Similarly, lobster krill can be found in dense shoals on the shelf where they constitute prey for seabirds, fish

Reference	Representation	Navitas response
		and baleen whales' to reflect krill constitute 'important' prey for higher predators.
FC 16	EIS: “There is a PhD studentship (SAERI and the University of Aberdeen) currently working on inshore zooplankton dynamics in Berkeley Sound. However, the results of this study will not be available for another year (i.e. mid-2025).” FC: Again, the EIS lists superfluous information that is not actually considered for the assessment. This adds unnecessary bulk to this lengthy document and is misleading.	The intention here was to note the ongoing work which will be available once the PhD is complete.
FC 17	Section 7.4.5.2.1 EIS: “Although the JNCC Seabirds At Sea Team (SAST) surveys are 24 years old, it is unlikely that broad-scale animal distribution and movement patterns have changed significantly. Hence, the SAST data remains useful to characterise occurrence of species, particularly where no tracking data exists.” FC: This statement is completely unfounded. Seabird assemblages are known to change, particularly in a changing climate. For example, in the UK, Webb et al. (2014) concluded that the abundance of some seabird species had changed significantly, and other species had shown an increase and subsequent decrease, compared to previous vulnerability assessments. (This was also highlighted in the Genesis 2017 review.) Also see e.g. Peron et al. (2010) which specifically refer to the effect of climate change on sub-Antarctic seabird distribution and abundance at sea. Webb et al (2014) therefore recommended that data under 15 years old would be the most appropriate (with no data older than 20 years) when assessing sensitive seabird concentrations to oil pollution.	Regarding occurrence and distribution: The statement that the 'general distribution and animal movement patterns' are unlikely to have substantially changed, is supported by tracking data and modelling work. It specifically relates to the importance of the Patagonian Shelf around the Falkland Islands, as foraging habitat for seabirds and marine mammals and static ocean features that are associated with enhanced primary productivity. Specifically, Baylis et al. (2019) highlights that for nine-species tracked, the probability of occurrence is highest on the Patagonian Shelf, shelf slope and the Burdwood Bank (Fig 7-53, pg. 360). These findings are similar to the at-sea distribution presented for the same species (White et al. 2002). This is likely to reflect productivity on the Patagonian Shelf, being linked to the Patagonian Shelf, slope and Burdwood Bank (static features, associated with predictable areas of enhanced productivity) (e.g., Fig 7-35, pg. 293). Based on the predictive models, and knowledge of local oceanography, the importance of the Patagonian Shelf around the Falkland Islands is unlikely to have changed over the past 24 years, hence animal distribution is still likely to be associated with the Patagonian Shelf. Peron (2010) is an interesting study, but is associated with oceanic fronts, rather than shelf-break fronts (i.e.., static vs dynamic features). Regarding abundance: The statement specifically relates to the distribution and movements of animals. Data gaps remain for both Falkland Islands breeding species, and migratory visitors. Filling data gaps will improve our understanding of occurrence and distribution.

Reference	Representation	Navitas response
FC 18	EIS: “Surveys commenced in 1998 and continued for three years” FC: Nowhere within this EIS is it highlighted that the OVI presented is actually based on just 2 years of data (see White et al. 2002: “The results of the first two years of surveys were published as an atlas depicting vulnerability of seabird concentrations to surface pollution Vulnerable concentrations of seabirds in Falkland Islands waters (White et al. 2001)”.) As highlighted by Genesis (2017): Webb et al. (2014) recommend at least three years of data for assessment purposes. In addition, nowhere is it explicitly shown what the actual survey effort was, relative to area of interest, not just the drilling site, but also the risk area in the event of a spill.	This work was conducted by FC in collaboration with the JNCC. Note that further surveys will target the region for three years pre-First oil by deploying SMMOs.
FC 19	EIS: “Over a two-year period between 2003 and 2005, additional data was collected by one of the original SAST observers using the same methodology en route between the Falkland Islands and South Georgia (Black, 2005b).” FC: These data are not actually considered further anywhere. Merely mentioning (potentially) useful data for informing this EIS is misleading and adds unnecessary bulk.	These data were included updating inshore observations; the data sets were re-analysed for this by one of the original SAST team.
FC 20	EIS: “There remain gaps in the SAST coverage but it is possible to infer the species assemblages that are likely to be found in these areas with the data available, therefore, White et al., (2002) has been used as a reference in the EIS.” FC: Please elaborate on the methodology used for such inferences and provide results of such analyses.	Please refer to section 7.4.5.2.1.1 JNCC Seabirds At Sea Team (SAST) surveys for context. As stated 'The SAST distribution atlas (White et al., 2002) and associated database remain the most useful description of seabird distributions within Falkland Islands waters, in terms of broad scale spatial and temporal patterns of distribution of breeding and non-breeding birds.' Hence, species assemblages, (the sentence following from this statement), refers to those species reported by White et al. (2002).
FC 21	EIS: “The [Genesis 2017] review concluded that the survey methods used, the coverage and the age of the data are comparable with existing datasets used to inform similar impact assessments undertaken in the UK” FC: This statement is deceptive and cherry-picks information provided within a highly biased and superficial review. FC make the following points: The Genesis 2017 report is not available online, reducing procedural transparency. FC appreciate that the report was provided to FC by	Thank you for the comment. It is acknowledged that the data set is old. As mentioned above, the tracking work complements the SAST data (see response to FC 17). Navitas are committed to deploying SMMOs on vessels developing the field 3 years prior to First oil.

Reference	Representation	Navitas response
	Navitas for consideration upon request. • Even if data were comparable (which they are not), this does not mean that the approach is adequate. • Genesis 2017 did not conduct a power analysis to assess the suitability of the Falklands data to determine whether sufficient data exist to enable adequate baseline characterisation and robust assessment of changes that could arise should the project be approved. The review merely discusses the results of a power analysis conducted on UK data. • The Genesis 2017 report misinterprets information that it uses for its arguments in relation to data suitability. For example, Kober et al. (2010) actually used data from 24 years ago, and as recent as 6 years prior to analysis, compared to Falklands with 2-3 years of data, as recent as 23 years ago. Other similar and more recent analyses to Kober et al. (2010) (e.g. Wilson et al. 2014) used data from 2009 – 2011 (i.e. <7 years old), yet this very comparable example was not used as would be expected in a non-biased review. The review further states that "The data obtained in the Atlantic Frontier is widely used as the baseline information used to assess potential impacts and vulnerability of seabirds from oil and gas developments within waters to the north and west of Scotland." The specific projects are not actually referenced. Also, the data referred to spans from 1979 – 1997, and as highlighted in the review, "the survey effort is greater than that from waters around the Falkland Islands, particularly in the main areas of interest". • An example of an up-to-date O&G EIS in the UK is the Rosebank EIS, which uses the JNCC SOSI (data from 1995 - 2015), and analyses by Waggitt et al. 2020 (data from 1980 – 2018). • Genesis 2017: "In their review of the ESAS data, Pollock & Barton (2006) recommended that data over 20 years old should not be used for assessment purposes." This information / reference is not considered in the EIS. • Genesis 2017: "Similarly, Webb et al. (2016) [should be Webb et al. 2014] advised that data in excess of 20 years may be 'too old' for all species but as a 'compromise' data from 1995 could be used as this was when the quality of data improved through standardised survey	

Reference	Representation	Navitas response
	techniques." This interpretation of the information is false and misleading. Webb et al. 2014 recommended that surveys of less than 15 years old and certainly no more than 20 years be used to assess the sensitivity of seabird concentrations to oil pollution. Webb et al. (2014) further stated the recommendation "Revise and update maps of seabird distribution and of the sensitivity of seabird concentrations to oil pollution using only data in ESAS collected since the start of 1995". This statement does not negate the recommendation that surveys of less than 15 years old and certainly no more than 20 years be used. •Genesis (2017): "Additional surveys focussed on areas where survey coverage is relatively low would improve the information used in the baseline." This indirect suggestion was ignored in the EIS •Genesis (2017): "Oil spill modelling indicates that there is a risk of oil arising from a blow-out to occur in areas to the north of 47°S for which there are no published survey data. Consequently, there is a risk that seabirds that were infrequently recorded by White et al. (2002) may occur more frequently in the largely un-surveyed areas to the north, e.g. Atlantic petrel" This concern is not mentioned in the EIS. •Genesis (2017): "There are gaps in the data obtained from boat-based surveys undertaken between 1998 and 2001. Of most relevance and importance is the lack of data within the area which, in the event of a blow-out, would be at very high risk of sea surface contamination. … The collection of additional survey data using boat-based methods to reduce the gaps in the existing data may provide a more robust understanding of the temporal and spatial distribution of seabirds within the region. This, may help inform the risk to seabirds from either sea surface contamination or light attractions which, in turn, would help in the undertaking of EIAs." These indirect suggestions have not been considered. •Genesis (2017) states that, "The seabird data collected in the Falkland Islands is less than 20 years old and therefore considered suitable for EIA and oil spill sensitivity purposes. However, it is noted that the data obtained from boat-based surveys in the Falkland Islands is becoming	

Reference	Representation	Navitas response
	older and its suitability for assessment purposes may become less reliable in future years." The data is now over 20 years old, and thus any inference of its suitability by Genesis 2017 is no longer a valid argument. •JNCC are currently looking to update their SOSI (which is based on data from 1995 – 2015), as these data are now considered too old (J Black pers. comm., Senior Marine Industries Ornithologist at JNCC).	
FC 22	EIS: "However, the survey effort is not dissimilar to the level of effort from the Atlantic Frontier waters located off the north and west coast of Scotland, where O&G exploration is also relatively new and developing" FC: Can this be substantiated by references to any specific projects or impact assessment? The Genesis report states: "The data obtained in the Atlantic Frontier is widely used as the baseline information used to assess potential impacts and vulnerability of seabirds from oil and gas developments within waters to the north and west of Scotland." However, no particular projects or impact statements are referenced. The Genesis report further states: "Although the survey effort is greater than that from waters around the Falkland Islands, particularly in the main areas of interest, the overall coverage is also not complete." An example of an up-to-date O&G EIS is the UK is the Rosebank EIS, which uses the JNCC SOSI (which uses data from 1995 - 2015), and analyses by Waggitt et al. (2020) (which uses data from 1980 – 2018).	It is acknowledged that the data set is old. Please refer to FC 17 with regards to tracking data and SAST derived distributions. Navitas are committed to collecting further data with SMMOs on vessels operating in the field for three years prior to First oil.
FC 23	EIS: "in addition to the SAST data, a significant amount of recent tracking data was collected and synthesised through the GAP process, which is also utilised in the impact assessment" EIS: "Preliminary results [from GAP tracking data] showing the range of each species, as derived from probability of occurrence data, support the known distributions of the species concerned. However, while vulnerability maps were produced, there is scope for additional work to interpret this data." (Also, in section 7.4.5.2.1.3) EIS: "The initial results of the GAP project are presented in Blockley and Tierney (2016) and Baylis et al. (2019). However, further work could potentially be undertaken to interpret this data with the aim of producing vulnerability maps." FC: It is unclear what work has actually been conducted with the GAP data specifically for the purpose of this EIS. It appears to be limited to	Vulnerability maps were not produced with the tracking data - the vulnerability maps were based on the at-sea data and White et al. (2001) (Fig. 7-73). The EIS compared tracking data with vulnerability maps produced by White et al (2001) and these are therefore considered complementary. Note that the availability of tracking data is continually evolving with regard to local projects. To ensure clarity, Navitas will edit the statement 'However, while vulnerability maps were produced, there is scope for additional work to interpret this data." (pg. 348) in the post consultation EIS.

Reference	Representation	Navitas response
	reproducing the maps from Baylis et al. (2019) in the EIS with the location of the drilling site superimposed on them. The maps show predicted habitat use. They are not vulnerability maps. Tracking data can provide useful complementary data, but they unfortunately do not compensate for the lack of up-to date at-sea data.	
FC 24	EIS "During the three years of the project major inter-annual variations in species distribution were not identified, perhaps because the study covered a relatively short time frame. Recent studies suggest that there may be significant inter-annual and spatial variation in foraging and migration patterns, for individuals of the same species breeding on the same island (Masello et al., 2010) and on island breeding sites that are in close proximity (Granadeiro et al., 2011; Catry et al., 2013). This is likely to be the case for individual birds but whether this is reflected in the foraging ranges of populations as a whole remains to be seen." FC: This directly contradicts a statement the EIS made in section 7.4.5.2.1 and supports the need for further data. See also Peron et al. (2010) and Webb et al. (2014) for evidence of changes in seabird assemblages over time, including within the sub-Antarctic.	The at-sea seabird surveys highlighted that for the majority of species, spatial distribution was broadly consistent between years (White et al. 2001 pg. 86). [While the majority of species were consistent, White et al. (2021) also highlight for some species - particularly migratory visitors - inter-annual variation existed. See FC 25)]. The reference to Masello et al. (2010) will be clarified. The statement draws attention to the spatial segregation and individual variability both within and between species, at a colony and individual level - which may impact distribution, but is generally not well understood. The EIS does state that 'whether this is reflected in the foraging ranges of populations as a whole remains to be seen'.
FC 25	EIS: "The three years of SAST surveys did detect some inter-annual variation but most of these concerned non-breeding visitors to Falkland Islands waters." FC: This directly contradicts a statement the EIS made in section 7.4.5.2.1 and supports the need for updated at-sea data and integration of data from Procellariiformes tracking database.	Regarding occurrence and distribution**:** The statement that the 'general distribution and animal movement patterns' are unlikely to have substantially changed, is supported by tracking data and modelling work. It specifically relates to the importance of the Patagonian Shelf around the Falkland Islands, as foraging habitat for seabirds and marine mammals and static ocean features that are associated with enhanced primary productivity. Specifically, Baylis et al. (2019) highlights that for nine-species tracked, the probability of occurrence is highest on the Patagonian Shelf, shelf slope and the Burdwood Bank (Fig 7-53, pg. 360). These findings are similar to the at-sea distribution presented for the same species (White et al. 2002). This is likely to reflect productivity on the Patagonian Shelf, being linked to the Patagonian Shelf, slope and Burdwood Bank (static features, associated with predictable areas of enhanced productivity) (e.g., Fig 7-35, pg. 293). Based on the predictive models, and knowledge of local oceanography, the importance of the Patagonian Shelf around the Falkland Islands is unlikely to have changed

Reference	Representation	Navitas response
		over the past 24 years, hence animal distribution is still likely to be associated with Patagonian Shelf. To reiterate, the general pattern will not have changed and this is supported by tracking data from the GAP programme and for the reasons outlined above. Individual variability will be inherent even over very small timescales. Navitas states that "major inter-annual variations in species distribution were not identified" but acknowledge that some variation ooccurred, specifically with some non-breeding visitors. Therefore, we do not consider this a contradiction.
FC 26	EIS: "A total of 242 seabird surveys were conducted from January until May 2011 during a 3D seismic survey in the licence area PL001, which is adjacent to the block containing the Sea Lion Field (Geomotive and MRAG, 2011). In addition, 226 individual seabird surveys were conducted over a larger area covering many of the [North Falklands Basin] NFB licence blocks from the end of November 2010 to May 2011 (Polarcus, 2011) … Additionally, a mixture of line transect and point surveys were conducted in March and April 2012 as part of the Sea Lion Field environmental baseline survey (Gardline, 2013a)." FC: The numerous surveys listed sounds substantial, but this information is meaningless in the absence of effort details. For example, according to information on the MRAG website (https://mrag.co.uk/experience/marine-mammal-and-seabirds-observation-survey-north-falkland-basin) the effort of the 242 seabird surveys by Geomotive & MRAG 2011 totalled 308 hours and 1350 km, which equates to approx. 1.25 hours and 5.5 km per survey. No effort details are provided for Gardline 2013a.	Navitas are happy to provide these reports. Note that this was conducted by a variety of observers not just MRAG and Gardline. These data and many other data sets (survey and telemetry) were used to the develop the baseline.
FC 27	EIS: Table 7.13 Number of seabird sightings during the PL001 and NFB Surveys FC: Table 7.13 lists the species for which tracking data are available within the FCZ. However, for several species (e.g. southern giant petrel, northern giant petrel, great shearwater, soft-plumaged petrel, white-chinned petrel, wandering albatross, northern royal albatross), most of which are Endangered, Threatened or Protected (ETP) species, these data are not further considered within this EIS. Again, the report is misleading	Noted, however the assessments are precautionary. The assessment on seabirds considers all of the assemblage.

Reference	Representation	Navitas response
	by referring to data which are ultimately not considered further in the EIS.	
FC 28	EIS: "The initial results of the GAP project are presented in Blockley and Tierney (2016) and Baylis et al. (2019). However, further work could potentially be undertaken to interpret this data with the aim of producing vulnerability maps." FC: Why has this work not been undertaken, given data have been available for > 5 years? Also, see Webb et al. (2016), who explain why the use of tracking data is not suitable for producing vulnerability maps: "These [tracking] studies have contributed greatly to our understanding of individual movements of seabirds but fall short when attempting to describe seabird populations and seabird concentrations as is required for this project. The main shortcomings of these data are their focus on the movements of adult birds and their focus on the breeding season. This means that there are relatively little data available covering the non-breeding season and non-breeding full-grown or immature seabirds. Furthermore, data for some species is limited by their suitability for carrying tags (e.g. on account of their size, their foraging behaviour or their behaviour in response to the tags). In order to include tracking data to determine the sensitivity of seabird concentrations to oil pollution, data would be needed for all species and all age classes in reasonable sample sizes within and out of the study area."	Please see section 7.4.5.2.1. The ES draws attention to the fact more recent tracking data is complementary to SAST data. Specifically, 'Hence, the SAST data are considered to be complementary to more recent occurrence data when undertaking the assessments in this ES. Limitations of the SAST data are described in the section below.' There are numerous peer reviewed publications that highlight the value of combing tracking data with at-sea surveys to improve occurrence and distribution estimates. Many of the gaps outlined in the comment, cannot be addressed through at-sea surveys - particularly gaps related to sex, breeding status and age. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil.
FC 29	EIS: "Tracking data for different age-classes, breeding stages and breeding colonies are limited for most species. This is particularly the case for immature / juvenile birds, periods outside of the breeding season and species that breed elsewhere (noting that most of the IUCN Endangered, Vulnerable and Near Threatened species encountered within Falklands waters do not breed on the Islands). So, although there has been a considerable research effort on tracking seabirds in recent years, there remain substantial data gaps." FC: Whilst the EIS recognises the limitations of available tracking data, particularly in terms of cryptic life stages and non-Falklands breeding birds, including ETP species, it fails to acknowledge that the best way to	Please see section 7.4.5.2.1. The ES draws attention to the fact more recent tracking data is complementary to SAST data. Specifically, 'Hence, the SAST data are considered to be complementary to more recent occurrence data when undertaking the assessments in this ES. Limitations of the SAST data are described in the section below.' There are numerous peer reviewed publications that highlight the value of combing tracking data with at-sea surveys to improve occurrence and distribution estimates. Many of the gaps outlined in the comment, cannot be addressed through at-sea surveys - particularly gaps related to sex, breeding status and age. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil.

Reference	Representation	Navitas response
	address the data gap is through at-sea surveys, as also highlighted in Webb et al. (2016).	
FC 30	In the previous EIS, it is stated: "Generally, small sample sizes and data gaps limit the ability to obtain statistically significant and biologically relevant results. Work is currently underway to address priority tracking data gaps in the Falklands (section 7.2.4.2), so that these data can be used in future assessments." The current EIS state "Generally, small sample sizes and data gaps limit the ability to assess vulnerability for all age-classes, breeding stages and in some instances, species. Further work is required to address priority tracking data gaps in the Falklands (Section 7.2.4.2), so that these data can be used in future assessments." FC: When will this additional work actually be undertaken? Also, see Webb et al. (2016), who state why use of tracking data is not suitable for producing vulnerability maps. Tracking data are not a substitute for the all-inclusive data that can be delivered by boat surveys. Instead, the data gap should be addressed using at-sea surveys.	At-sea observer data has limitations. For example, for many species it is not possible to identify sex, age and breeding status during at-sea observations. Hence, the EIS highlights tracking and at-sea observer data complements one another, and ultimately strengthens our understanding of species distributions. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil. See also FC 7.
FC 31	EIS: "Notable additions to seabird tracking data since the GAP project, include a recent SAERI led tracking project (DPLUS139) that included six species and 5 breeding colonies (Table 7.14). Combined with the GAP project data, this yields over 360,000 at-sea locations from 10 species (Figure 7-48). This data is yet to be formally analysed but could be integrated into future assessments. FC: This merely states the availability of more tracking data that have not actually been further analysed for the purpose of this EIS. Again, we highlight that tracking data are not suitable for producing vulnerability maps in the absence of much more all-inclusive at-sea data.	At-sea observer data has limitations. For example, for many species it is not possible to identify sex, age and breeding status during at-sea observations. Hence, the EIS highlights tracking and at-sea observer data complements one another, and ultimately strengthens our understanding of species distributions. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil.
FC 32	EIS: "In addition, the Falkland Islands provides important foraging habitat for seabird species that breed elsewhere, particularly at South Georgia (e.g. Berrow et al., 2000; Phillips et al., 2006; Ratcliffe et al., 2014). BirdLife International manages the Global Procellariiform Tracking Database (BirdLife International, 2004), which serves as a central repository for albatross and petrel tracking data from all over the world. The model has recently been extended to penguins (and other seabirds). Work is currently underway in the Falklands to collate, and	Figure 7-53 does indeed reflect global population for individual species. The prior EIS and associated development was not continued. Hence, no further work was carried out. The current EIS relates to Navitas and an updated development plan. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil. Note: Baylis et al. 2020 will be corrected to 2021.

Reference	Representation	Navitas response
	determine how best to use, the tracking data available for seabirds breeding and visiting the Falkland Islands" FC: Again, the EIS refers to available data which could potentially provide useful complementary information without actually using the information. This is misleading and adds unnecessary bulk. The previous EIS already stated that data from the Global Procellariiform Tracking Database would be used to include more info from non-Falklands breeding birds. This has not happened. Instead, the current EIS merely repeats that this work will be conducted. Similarly, it was already mentioned in the previous EIS that "Work is currently underway in the Falklands to collate, and determine how best to use, the tracking data available for seabirds breeding and visiting the Falkland Islands". Although some additional raw data figures have been reproduced in the new EIS of Falklands breeding birds, no additional analyses have been undertaken, nor have any additional data for non-breeding birds been considered.	
FC 33	EIS: "The EMMP (Chapter 15) will collect further data in the field, specifically using SMMOs on two vessels for the first three years of the project (post sanction, pre-First Oil and post-First Oil). Data collected here will allow of a comparison of the SAST data going forward'." FC: Such data should be collected and appropriately analysed pre-sanctioning to adequately inform the EIS of this development. This section identifies the issue of annual variation in foraging patterns, and limited temporal extent of tracking and boat-based data. Why has additional data not been collected to fill this gap?	Please refer to the response to FC 12.
FC 34	EIS: Table 7.14 Summary of deployments from a recent multi-colony tracking project. FC: Good to see additional tracking data from NW/SW Falklands which can serve as complementary information, although information continues to be scarce from north/northeast Falklands colonies. Importantly, we again stress the point that tracking data can only serve as complementary information to adequate at-sea data. The previous EIS version said that these additional data would be	The EMMP aims to collect further data in the field, specifically using Seabird and Marine Mammal Observers on two vessels for the initial years of the project (post sanction, pre-First Oil and post-First Oil).

Reference	Representation	Navitas response
	included in vulnerability analyses. As we understand the data presented, this work has not been conducted.	
FC 35	EIS: Figure 7-48 Combined data, from both satellite (PTT) and GPS tags EIS: Table 7.16 Data derived from tags other than GLS tags FC: It would be useful to have a table showing how much data originates from individual colonies and years given the issue of inter-colony and inter-annual variation. Also, the original source of these data should be referenced.	Table 7.16 includes season and colonies from which tracking data was derived. Baylis et al. (2019) will be included as the data reference.
FC 36	EIS: Figure 7-53 An overview of the GAP data from Baylis et al. 2019 and Baylis et al. 2020 FC: The reference should be Baylis et al. 2021 not Baylis et al. 2020. The percentage of global population plot is misleading, as this table is about the importance of the site to Falklands birds. Whilst this additional plot has been included, the previous EIS stated that these data would be considered as part of a vulnerability analysis. This work has not been conducted. Simply superimposing the drilling area on a map is not a vulnerability assessment, particularly as a much wider area can potentially be at risk in case of a spill.	Figure 7-53 does indeed reflect global population for individual species. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil. The development outlined in the previous EIS (related to Premier Oil), was not continued. Hence, no further work was carried out. The current EIS relates to Navitas and an updated development plan. Note: Baylis et al. 2020 will be corrected to 2021.
FC 37	EIS: “the resources required to undertake simultaneous tag deployments on multiple predator species from multiple colonies is typically not feasible.” FC: Resources should be made available to collect the necessary data prior to sanctioning a large project like this and though expensive, in relative terms to the development, is small. However, importantly, the focus should be on at-sea data collection, rather than tracking, for all the reasons highlighted previously.	Please refer to the response to FC 12.
FC 38	EIS: Figure 7-59 The locations of 30 gentoo penguins tracked during the winter and early summer from five locations FC: It would be helpful to see the drilling area superimposed on these maps, as well as the risk areas in case of a spill. In any case, it’s not clear as to where these additional data fit in. Baylis et al. (2019) uses data from 25 + 45 individuals. Baylis et al. (2021) do not show these maps. Where do these 30 birds fit in? Is this additional data or is this the same	The comment is noted, thank you. This reference should be '25 gentoo penguins tracked'. This will be corrected and the drilling area superimposed in the finalised version of the EIS. Data are the same as Baylis et al. 2019.

Reference	Representation	Navitas response
	data as shown elsewhere but presented in a different way? If this is additional data, this could be added within an updated analysis.	
FC 39	EIS: "The best known and probably largest colony of sooty shearwaters (Ardenna griseus) is found on Kidney Island, in the mouth of Berkeley Sound, which is estimated to comprise 139,000 pairs (Wakefield et al., 2017)." FC: Clark 2019 is a peer-reviewed publication of Wakefield et al. 2017 report. Also see latest survey of WCP and SSW on Kidney and Top Islands (Kuepfer et al. 2024 – appreciated this report was not available at the time of the EIS preparation).	Reference to Clarke et al. 2019 will be included.
FC 40	EIS: "There is a very small breeding population of white-chinned petrels (Procellaria aequinoctialis) in the Falkland Islands, estimated at 55-100 pairs (Reid et al., 2007)." FC: See Kuepfer et al. (2024) for updated estimates at two of Falklands breeding sites – appreciate this info was not available at the time that the EIS was prepared.	This information was not available when the EIS was published. Wherever possible, Navitas will include a reference to reports published after the EIS was produced.
FC 41	EIS: Table 7.17 FC: BBA dive to at least 19 m, not 10 m (see Guilford et al. 2022). IUCN Red List needs correcting. MAG is Least Concern, not NT (See BirdLife International 2020). For BBA population estimate in FI, reference Crofts (2020), which lists data from the 2017 census.	Table 7.17 will be amended. to include IUCN status, and references.
FC 42	EIS: Table 7.20 FC: This is a bit confusing. How can we know the long-term trend without knowing the short-term trend for certain species? KS Eagle Hill 2010 counts – where are these data from? The EIS states that 2022 data are from Stanworth 2014.	Table 7.20 has 'unknown' to reflect data gaps for some species/locations. Keupfer and Stanworth (2023) will be included as a reference for Berkley Sound counts in 2022.
FC 43	EIS: "all colonies are counted during the island-wide census, which takes place approximately every five years." FC: This is incorrect. The last census was 14 years ago.	The comment is acknowledged and the finalised version of the EIS shall be re-worded to reflect the island wide-census being undertaken 5-yearly until 2010, and no subsequent island-wide census since 2010.
FC 44	EIS: "For example, on the basis of the most recent archipelago-wide census, the population trend for the black-browed albatross population in the Falklands is positive (Wolfaardt, 2012)" FC: Reference Crofts (2020) which lists information from the latest census in 2017.	Include reference to Crofts (2020).

Reference	Representation	Navitas response
FC 45	EIS: "To assess the relative risk to different species, the JNCC developed an index to assess the vulnerability of bird species to the threat of oil pollution (Williams et al., 1994). One of the main outputs of the SAST surveys in the Falkland Islands was the production of an Oil Vulnerability Atlas (White et al., 2001)." FC: These Vulnerability maps do not consider the full dataset collected, and only include 2 years of data. This important detail is not highlighted to readers (see White et al. 2002: "The results of the first two years of surveys were published as an atlas depicting vulnerability of seabird concentrations to surface pollution Vulnerable concentrations of seabirds in Falkland Islands waters (White et al. 2001)"). As highlighted also in the Genesis (2017) report, Webb et al. (2014) recommend at least three years of data for assessment purposes.	The maps were produced by SAST, an FC and JNCC collaboration, funded by industry and FIG. Navitas has acknowledged that whilst the data set is old; complimentary, additional surveys and tracking work have augmented and improved the baseline. Please also note that Navitas has committed to deploying SMMOs on the offshore support vessels (OSVs) for the first three years of operations.
FC 46	EIS: "Recently, JNCC have updated the OVI to include recent survey data and using a new method, which has been named the Seabird Oil Sensitivity Index (SOSI)" Page 20 of 57 FC: It's not clear why an OVI is used as opposed to the newer method of SOSI, which is highlighted by JNCC as an improved measure of seabirds' sensitivity to oil pollution.	The SAST used the OVI and therefore this was used as part of the risk assessment. Navitas are aware of the SOSI and this could be used with new data gathered in the future. Note that Navitas will deploy SMMOs on vessels developing the field for three years pre first oil.
FC 47	EIS: Figure 7-73 Seabird Vulnerability Maps for summer months FC: The OVI by White et al. 2001 only used data from 2 out of 3 years of survey. So not only is the OVI based on very old data, but it also fails to consider all data available. According to Webb et al. 2014, vulnerability maps for oil and gas should be based on at least 3 years of data. Additional tracking data have been collected and presented in current EIS, but this has not actually been included as part of an updated integrated vulnerability assessment analysis. The Falkland Islands waters are recognised as one of the most important seabird areas globally, and the EIS of such a large undertaking should produce a comprehensive and up-to-date seabird vulnerability index.	Noted - please see responses to previous comments above. Also note that the scale of a SAST like programme pre-sanction is not appropriate for a single operator (see FC 12). This would need to be an industry / government collaboration. Note that Navitas will deploy SMMOs on vessels developing the field for three years pre first oil.
FC 48	EIS: "Data collection and analyses are now complete as set out by GAPII objectives. However, it will take further analysis to determine	The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil. This will include reviewing

Reference	Representation	Navitas response
	how the results of this work can best be used to quantitatively assess the potential impact of the O&G industry in the Falkland Islands." FC: Although additional data have been collected, the EIS itself states that further analyses are required to adequately make use of these data to assess the potential impact of this project. GAP collected tracking data on 9 Falklands breeding birds, which does not provide information on all other species/ age groups/ colonies that utilise the area, many of which do not breed in the Falklands. The EIS itself states: "The SAST data set is also useful in that it includes species that do breed in the Falkland Islands but use its waters for foraging or as migrations corridors."	data gaps. The additional analysis of the data collected by the GAP project, and indeed other projects associated with a wide-range of groups, is ongoing. Outcomes from this ongoing work which are relevant to the project will be used to inform the EMMP and project-specific data collection and monitoring requirements.
FC 49	EIS: "Existing data will be collated and used to perform assessments through expert-led processes." FC: Can you clarify what is meant by "expert-led processes"? Any further analyses that can help inform this impact statement should be conducted and presented prior to the project being sanctioned.	An expert-led process in the analysis of telemetry data i.e., individual/s with expertise in animal telemetry and data analysis. The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil.
FC 50	EIS: "At the time of compiling this Environmental Baseline Description, initial analysis of data collected by the GAP project has been published by Baylis et al., (2019), Baylis et al., (2021) and by the seal by-catch project through SAERI (Riaz et al., 2023). The results from this work are included and referenced in the relevant sections below." FC: Results from Riaz et al. (2023) are not referred to in any further sections. Hence, this is not relevant to the EIS.	The comment is noted, Navitas shall delete the sentence: 'The results from this work are included and referenced in the relevant sections below.' in the updated version of the EIS.
FC 51	EIS: Gap results FC: This whole section simply regurgitates the results from Baylis et al. (2019, 2021). The EIS does not attempt to make the results relevant to the Sea Lion area, or the area at risk in case of a spill. As the EIS acknowledges, this tracking data can lead to misleading conclusions being drawn and important areas missed (annual variation / seasonal variation / age-specific variation).	The EMMP aims to undertake further analysis of the satellite tracking data post sanction, pre-First Oil and post-First Oil. This will include reviewing data gaps.
FC 52	EIS: "Vulnerable areas within Berkeley Sound, for seabirds, are linked to the location of colonies and aggregations associated with these colonies" FC: Are the many designations (KBA/IBA/NNR/ACAP breeding sites) assigned to colonies within Berkeley Sound being considered at all?	Please refer to sections 7.5.2.3.1.1 IBAs in Berkeley Sound and 7.5.2.3.4 Key Biodiversity Areas

Reference	Representation	Navitas response
FC 53	EIS: Table 7.34 FC: New Island – Landowner should be FC.	Noted, this will be updated.
FC 54	EIS: "The Kidney Island Group are designated as an Important Bird Area (Falklands Conservation, 2006). The most significant species contributing to the IBA status are shown in Table 7.36." FC: Kidney and Cochon Islands have National Nature Reserve (NNR) and Important Bird Area (IBA) designations. Kidney Island also has Key Biodiversity Area (KBA) designation. Kidney, Top & Bottom Islands represent ACAP breeding sites No. 80 and 81 for white-chinned petrels. The vicinity of Top & Bottom Islands is not considered in this EIS.	Noted, this will be updated.
FC 55	EIS: "Although there is some seasonal movement of birds between the Falklands and South America, the location of the Sea Lion Field and Berkeley Sound are not regarded to be on the route of migrating land …" FC: Please provide supporting references.	White et al. (2002) will be added. Note the sentence reads 'not regarded to be on the route of migrating land birds and therefore the potential risk to seabirds is of greatest concern'
FC 56	EIS: "the impact of lighting has been estimated to extend to 3-5 km around offshore installations" FC: Please provide a reference for distance at which birds are affected by light sources.	The reference already provided for 3-5km was Marquenie (2007) - report is freely available online. Nevertheless, Navitas will update this clarify light pollution could impact birds differently (age/stage) and at different distances, and Navitas cannot rule out birds are attracted at a much greater distance.
FC 57	EIS: "Data compiled from at-sea surveys, annual monitoring programs, coastal surveys and tracking data were used to indicate the seasonal abundance of the most susceptible species near the Sea Lion Field (Knipe and Pendoley, 2019)." FC: It would be helpful to make the work conducted in reports such as Genesis (2017) and Knipe & Pendoley (2019) publicly accessible for improved transparency. See above our comments why the seabird data used is inadequate / insufficient for the purpose of this risk assessment.	Noted. These are available upon request. The Genesis 2017 report has already been requested and provided.
FC 58	EIS: Table 10.3 FC: Southern rockhopper penguins are listed as Vulnerable, which does not appear to be considered in this table.	Noted. This will be amended.
FC 59	EIS: "The available survey data indicate that there will be a low number of individuals of all of the potentially susceptible species present within the zone of influence of the Development (Section 10.1.4.3.1.4). Although accurate population estimates are not available for all species,	Biogeography is geographic distribution. Hence, the statement that there is no information on geographic distribution of species listed in Table 10.4, to which the statement pertains (petrels, prions, shearwaters) is incorrect. Reference to BirdLife International (2024) will be included.

Reference	Representation	Navitas response
	the biogeographical populations are known to be very large. Therefore, it is anticipated that the assemblage of birds within the zone of influence of the Development, at any given time, will not be of geographical importance (i.e. <1 % of the local population). FC: "The biogeographical populations are known to be very large." - Please reference. This section makes assumptions based on inadequate data of bird assemblages, insufficient data on bird-strikes, and non-existing data on biogeographical populations. Low fecundity rates and a relatively protracted time to reach maturity of procellariiformes means seemingly small impacts on survival rates can have large impacts on population viability, making them particularly vulnerable to lethal impacts. Cumulative threats will have additive impacts.	
FC 60	EIS: "While seabirds may be distracted from natural feeding behaviour or may expend energy flying in circles around the vessel which has the potential to affect the body condition of the birds, the impact will be short-lived (a matter of hours) and should not have long-term consequences provided there is no contact between the birds and the vessel." FC: Please provide supporting references for this statement. The distance from which birds may be attracted has not been considered here. This information may not be available; however, if birds are potentially attracted from several kilometres away, the adverse effects could greatly increase, as the number of birds impacted increases.	Thank you for the comment. This shall be taken into consideration. Navitas will provide a supporting reference in the post-consultation EIS.
FC 61	EIS: "the LTV anchorage location is situated approximately 10 km inshore of the breeding colony, so birds will not routinely pass the site en route to the colony" FC: Please provide a reference. Particularly fledglings may become disorientated by lights up to 15 km, see e.g. https://www.dcceew.gov.au/campaign/light-pollution/seabirds.)	Bonnet-Lebrun et al. 2020 will be included as a reference, and sentence clarified to refer to breeding SSW. While appealing, the 15 km stated in multiple Australian Government pamphlets on light pollution, it is derived from Rodriguez et al. 2014.The authors simply state that 'This factory is located on mainland Australia about 15 km from the closest shearwater breeding colony (Cape Woolamai) and produced light pollution levels around 27 nW/sr*cm2 during the construction phase, which is 5 times higher than the most light-polluted area on Phillip Island (Figure 1). In 2012, 237 fledglings were grounded at this site, which constituted the

Reference	Representation	Navitas response
		equivalent to one-quarter of all grounded birds on Phillip Island in the same year and supports the hypothesis that fledglings can be attracted to lights after reaching the ocean.' There is no information on the distance from which birds were attracted to light, just a straight-line distance from the breeding colony to the grounding location.
FC 62	EIS: "Significant as multiple seabird strikes are closely linked to weather conditions (Section 10.1.4.3.1.3) and are more likely to occur when visibility is reduced due to fog or snow. However, under these conditions, the deck lights of vessels may not be visible at a range of 10 km such that the zone of influence is effectively reduced." FC: Please reference what is visible to birds under various conditions. The literature suggests that collisions generally increase in conditions of poor visibility.	The context of the statement is in relation to the LTV being located 10 km inshore from the breeding colony, and the fact that tracking data shows that birds don't routinely travel inshore during foraging trips. Specifically, the EIS states 'However, the situation in Berkeley Sound is unusual in that the LTV anchorage location is situated approximately 10 km inshore of the breeding colony, so birds will not routinely pass the site en route to the colony. This is significant as multiple seabird strikes are closely linked to weather conditions (Section 10.1.4.3.1.3) and are more likely to occur when visibility is reduced due to fog or snow. However, under these conditions, the deck lights of vessels may not be visible at a range of 10 km such that the zone of influence is effectively reduced.' The sight-distance of birds at night in poor visibility is not something that features readily in scientific literature. The point being made is the LTVs will be 10km from the colony, and lighting will be minimised as far as practicable. Consequently it is thought unlikely that the vessel lights will be visible to birds some 10km away in weather conditions that result in poor visibility. Note also that the birds will be in burrows at night-time rather than in-flight.
FC 63	EIS: "Penguins are known to use contact calls to communicate when on the surface, however, there is little evidence to suggest that they vocalise underwater (O'Brian, 2002)." EIS: "EIS: "An SEL threshold of injury of 202 dB re 1µPa2 s was agreed on by the panel (SAIC, 2011). The threshold found for the marbled murrelet was applied here to estimate the underwater noise impacts to diving seabirds." FC: This EIS is missing some key up-to-date literature. The EIS suggests that there is no clear evidence that penguins are disturbed by noise, or that they use sound for communication underwater. However, see e.g. Sørensen et al. 2020, Thiebault et al. 2019, Pichegru et al. 2022.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.

Reference	Representation	Navitas response
	- Sørensen et al. (2020) state: “The fact that penguins can detect and react to underwater stimuli may indicate that they make use of sound stimuli for orientation and prey detection during dives. Further, it suggests that penguins may be sensitive to anthropogenic noise, like many species of marine mammals.” “strong reactions in more than 60% of the playbacks at 120 dB re 1 µPa” “The fact that penguins react strongly towards these rather weak sounds,…”, “Another surprise was that the 20 dB increment in received level was sufficient to change the reaction of the birds from no observable response to a strong aversive response.” - Thiebault et al. (2019) on use of vocalisation in hunting penguins (King, Gentoo, Macaroni) state: “All vocalisations were emitted during feeding dives and more than 50% of them were directly associated with hunting behaviour”	
FC 64	EIS: “Although anecdotal, these observations indicate that penguins do not strongly avoid areas where vessel noise is prevalent.” Page 23 of 57 FC : See Pichegru et al. (2017, 2022): “African penguins likely relocated away from their traditional feeding zone to avoid the disturbance generated by the noise of the seismic vessels, rather than to follow their prey”	No seismic operations are planned as part of the proposed development and please also note that the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 65	EIS: Table 10.31 Summary of the impact assessment for underwater noise offshore FC: Behavioural disturbance to seabirds should be included given evidence from elsewhere (see comments above)	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 66	EIS: “Disturbance and behavioural response thresholds: § Fish (Popper et al., 2014), and § Marine mammals (Southall et al., 2007).” FC: In light of information from up-to-date references, seabirds should also be considered here in terms of peak pressure level results.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 67	Section 10.4.4.4.4.2 EIS: “For seabirds, there are no guidelines to determine what constitutes a behavioural disturbance or threshold sound level.”	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations

Reference	Representation	Navitas response
	FC: See e.g. Sørensen et al. (2020) who recorded strong reactions by Gentoo penguins in more than 60% of the playbacks at 120 dB re 1 µPa.	suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 68	EIS: "levels of sound during inshore operations will be similar to the noise levels currently occurring within the Sound and therefore, there will be little or no additional impact from underwater noise on seabirds present in the area" FC: What about the additive effects of more noise?	This is considered in cumulative impacts, see section 10.5.9, noting that there will be only two additional vessels at any one time (and will they will mostly have their engines off and weather vaning for the duration of the their stay in the sound).
FC 69	EIS: "Where artificial light, poor visibility and high seabird numbers coincide, 1,000's of birds may collide with a vessel on a single night. While there are no published records, light induced bird collisions with vessels, with varying numbers of birds affected, are a regular occurrence around the Falkland Islands (A. Black pers. obs.)," EIS: "Multiple bird strike events can result in hundreds of bird mortalities in a single night, however, these events usually occur close to land (i.e. breeding sites) where some birds congregate at dusk" FC: It is unfortunate that no efforts have been made to improve the bird-strike data. If you speak to captains from fishing vessels, it appears that larger-scale bird strikes away from shores are not uncommon. As the EIS states – "However, in conditions of poor visibility (due to fog, snow or rain) the problem is exacerbated, and more individuals are likely to interact with vessels emitting light".	In line with the BSMP, bird-strike data will be reported on all vessels. With regard to existing data from cargo/cruise /fisheries vessels etc. in the Falkland Islands, Navitas would welcome receipt of such reported data. Navitas believe the approach to be precautionary however papers suggested, such as, Coleman et al. 2022 will be reviewed and changes made to the chapter if it is deemed appropriate. See also FC 78.
FC 70	EIS: "Therefore, there is a need to identify opportunities for improvement through mitigation and controls, and to consult with project stakeholders" FC: When will this be done? This should be done pre project sanctioning. It is disappointing that no efforts have been made to try and fill this data gap.	The EMMP Summary table regarding EIS Artificial light was discussed with key stakeholders during the EMMP workshop (April 2019). This detailed proposed monitoring and management actions. The EMMP workshop also discussed governance and suggested that the EMMP board 'would be supported by an advisory committee including both non-technical stakeholders and relevant individuals with expertise in the subjects being monitored. The advisory committee would help draw up the specifications to be used in contracting particular monitoring work, and would be able to comment on the results of the monitoring - this would include giving advice as to whether any threshold had been passed, any further management that might be needed and reviewing whether monitoring efforts should be increased or could be reduced.'

Reference	Representation	Navitas response
FC 71	EIS: “With regard to the likelihood of a multiple bird-strike event occurring, such a strike is likely to occur less than once per year but more than once in 10 years.” The assumption that this will happen less than once in a year is unfounded. It is very likely that multiple bird strikes are not uncommon (based on communications with fishing captains), but simply under-reported. See e.g. Coleman et al. 2022.	Thank you for the comment. See FC 69 and 78.
FC 72	EIS: “The Falklands population has shown a long-term decline in numbers and is the subject of a dedicated management plan.” FC: Please reference FISMP report (Kuepfer & Stanworth 2023): Breeding population (Falkland Islands): 1991–2022, stable; last 10 years, decreasing Breeding success (Falkland Islands): 1993–2022, decreasing; last 10 years: stable-decreasing	Noted, this will be updated. See also FIFD 54.
FC 73	EIS: “Although anecdotal, these observations indicate that penguins do not strongly avoid areas where vessel noise is prevalent.” FC: Please provide supporting references for such statements. Penguins are known to be sensitive to vessel noise and other marine noise pollution. See e.g. Pichegru et al. 2022 who assessed vessel-derived underwater noise levels on a penguin population.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 74	EIS: “Local feathers from nine species of Falkland birds were tested in dispersed oil at a concentration of 100 mg/l, and oil droplets of c. 100 microns were produced into the water column.” FC: Would be useful to refer to the table here where the species are listed. It is unfortunate that this important report is not readily accessible to the public for independent assessment of the methods used.	Noted. The reference to the table will be added. All reports are available upon request.
FC 75	EIS: “This species has a high potential for natural dispersion and is known to be established in Port William and may have reached Berkeley Sound already (P. Brickle pers. comm.).” FC: We feel that the use of pers. comm. for statements like these is inappropriate. Please provide an adequate reference or remove.	Thank you for the comment. Navitas believe this is valid as there is a great deal of expertise and many years of observation from those that imparted knowledge.
FC 76	EIS: “Feathers were dipped into a concentration of 100g/m2 oil in seawater: No oil was adsorbed by feathers” FC: how was it determined whether or not oil had been absorbed by feathers? Visual assessments under normal light conditions can be	The work was done by CEDRE. Based in France this company is considered internationally to be expert in accidental water pollution. CEDRE has five main activities: response support, contingency planning, training, analysis and testing and research. It conducts this research to a

Reference	Representation	Navitas response
	insufficient to detect sub-lethal oil concentration on feathers which may nonetheless have impacts on individual's performance and survival (See e.g. Fallon et al. 2020)	standard. It should be noted that Sea Lion crude is very waxy and at ambient temperatures does not stick to feathers. Under experimental conditions the oil had to be heated up for it to stick to feathers. The report can be shared for more information. The Fallon (2020) paper refers to crude from Macondo. This is very light and non-viscous in nature and therefore not a good comparison.
FC 77	EIS: "A preliminary assessment of seasonal vulnerability of seabirds to oil contamination within Falkland Islands waters was performed on data collected by the Joint Nature Conservation Committee (JNCC) to produce an Oil Vulnerability Atlas, (White et al., 2001)." FC: For reasons explained earlier, these data and analyses are inadequate for the purpose of a risk assessment. There is no evidence to suggest that bird assemblages and distributions have remained the same as documented 20+ years ago. The data are too old (see best practice advice by JNCC, Webb et al. 2016). In addition, the vulnerability maps are based on 2 years of data, which is less than the recommended number of years of data (see Webb et al. 2014, 2016).	The EMMP aims to collect further data in the field, specifically using Seabird and Marine Mammal Observers on two vessels for the initial years of the project (post sanction, pre-First Oil and post-First Oil).
FC 78	EIS: Table 14.1: Overall summary of EIA findings FC: Large scale bird strike with vessels is not "possible", it's at best "probable" ("Likely"). Efforts to collect appropriate data should be made pre-sanction. Cumulative bird strikes over the years and with other anthropogenic sources should also be considered. Small scale bird collision is not "likely", it is "certain". An effort to collect appropriate data should be made pre-sanction. Behavioural disturbance to seabirds from underwater noise is not considered, despite evidence that this can be an issue.	See also FC 69. Navitas understand that this data is not routinely collected on vessels. The likelihoods are based upon the data available. If data can be provided to better inform the likelihood of small and large-scale bird strikes, these will be considered within the impact and risk assessment. The underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 79	EIS: "where uncertainties in the EIS arise from lack of baseline data" FC: Baseline data need to be available prior to project sanctioning. Also, previous EIS have promised certain work that has not been completed. Given this history, what assurance do we have that any further information will be provided in a timely manner?	FIG EIA guidance (2016) acknowledges that the presence of justifiable data gaps 'does not make an EIS unfit for purpose' (Section 3.13) and that where there are data gaps a risk may be increased to reflect a higher level of uncertainty.' (Section 3.18) . Previous commitments undertaken during the 2020 EIS were made to collect additional data and undertake additional work following project sanction. The project has not yet been sanctioned; however, Navitas has restated its commitment to gather this

Reference	Representation	Navitas response
		data and undertake additional work post FID and regulatory approval. FIG can condition project approvals on this further work being undertaken and has powers to sanction the Operator if these commitments not met.
FC 80	Omission of relevant spatial areas identified as having global importance for marine mammals. Although the following areas are non-statutory, they have been identified and accepted by the IUCN. Section 7.5.2.3 (P475) of the EIS acknowledges that such areas should be considered during planning and risk assessment. However, Important Marine Mammal Areas (IMMAs) have not been mentioned in the EIS (despite both Important Plant Areas and Important Bird Areas being acknowledged as relevant and shown in Figures). While the FI IMMAs are relatively recent (2023 to 2024), the process has been ongoing since 2022 and been publicised locally. The areas relevant to marine mammals in the Falklands include: i. Key Biodiversity Area (KBA) for endangered sei whales (and more recently also for seabird species): www.keybiodiversityareas.org/site/factsheet/49174 The KBA is shown in Figure 7-96 and mentioned in Section 7.5.2.3.4 and briefly on P858, 1058 and 858. The KBA was accepted by the IUCN following independent review and its existence for sei whales warrants improved recognition in the EIS considering that Berkeley Sound falls within it; ii. Important Marine Mammal Area (IMMA) for endangered sei whales (and for marine mammal aggregations): https://www.marinemammalhabitat.org/factsheets/falkland-islands-malvinas-inner-shelf-waters-imma/ iii. Important Marine Mammal Area (IMMA) for wintering southern right whales: https://www.marinemammalhabitat.org/factsheets/north-east-falklands-malvinas-right-whale-wintering-area-imma/ iv. Important Marine Mammal Area (IMMA) for foraging elephant seals: https://www.marinemammalhabitat.org/factsheets/south-western-patagonian-continental-shelf-imma/ v. Important Marine Mammal Area (IMMA) for breeding/moulting elephant seals and for killer whales: https://www.marinemammalhabitat.org/factsheets/sea-lion-islands-	Thank you for comments. They shall be taken into consideration.

Reference	Representation	Navitas response
	group-imma/ The latter two IMMAs do not overlap with either the Sea Lion field or Berkeley Sound, but are included here for information. The boundary of one additional IMMA (https://www.marinemammalhabitat.org/portfolio-item/slope-front-of-the-argentine-shelf-imma) is located approx. 100 km north-west of the Sea Lion oil fields and supports a high diversity of marine mammal species. This should be recognised and discussed in relation to the oil spill modelling results. The boundaries of the KBA, Inner Shelf Waters IMMA and North-east Falklands IMMA include the waters of Berkeley Sound and Port William, and their existence should be incorporated throughout the EIS in relation to their recognised high marine mammal sensitivity, especially in sections where other spatial sites (e.g. NNR, IBA) are discussed. A wealth of information on whale distribution, movements, seasonality, behaviour, habitat, site fidelity, conservation status and population trends are provided in the supporting evidence for the sites (see IMMA links and Weir, 2021), almost none of which has been used to recognise the extent of whale sensitivities in the EIS. • Identification of Key Environmental Sensitivities (KES). The risk assessment relies on the identification of 'Key Environmental Sensitivities (KES - also 'Environmental Receptors')', and the sensitivity assessment is based on criteria including conservation status, critical habitat, seasonality, vulnerable parts of a species lifecycle etc (Section 8.5.2.1 and Table 8.1). Consequently, it is essential to correctly identify and consider the latest available information on those KES. With regard to cetaceans, the eight years of work on baleen whales (primarily sei whales and southern right whales, SRWs) in the Berkeley Sound area has not been appropriately represented in the EIS. Erroneous findings from early studies are listed throughout the EIS (for example, that Berkeley Sound is a fin whale hotspot, and that 2017 was a 'one-off' year for Southern Right Whales). Key concerns regarding the cetacean sensitivity assessments are: i. Information on the offshore occurrence of cetaceans that would	

Reference	Representation	Navitas response
	facilitate a robust assessment of the KES at the Sea Lion field is largely lacking, and the limited information presented has been over-interpreted and over-described in the EIS, risking making it appear to be a more reliable indicator of offshore cetacean occurrence than evidence suggests. For example: • the seismic MMO data is approximately a decade old (the last survey in FI waters was 2013). The total amount of data is small; • the White et al. (2002) report is two decades old (data collection from Feb 1998 to Jan 2001) and primarily used ESAS methods aimed at recording seabirds in a strip transect (rather than methods that optimise for cetaceans); • the Hipsey et al. (2013) report analysed only 5% of the data from a 1-year period (Jul 2012 to Aug 2013) of continuous acoustic monitoring, and the remaining 95% has not been assessed. Notwithstanding caveats (like animals might be present but not vocalising), this latter dataset could have potentially provided the best information on year-round occurrence of cetaceans at the Sea Lion field. Additionally, some conclusions reached in the Hipsey et al. (2013) report have since been shown to be erroneous (specifically they stated that they did not record Sei Whales, whereas Cerchio and Weir (2022) show that the vocalisations they attributed to Leopard Seals were Sei Whale song). The latter finding is significant in terms of confirming reproductive behaviour (singing) of sei whales at the Sea Lion field, but has not been mentioned in the EIS. While we accept that robust information for cetaceans at the Sea Lion field simply isn't available at this time, it's unfortunate that: (1) efforts haven't been made to implement such surveys as an environmental baseline ahead of production commencing; and (2) the existing year-round acoustic dataset hasn't been fully analysed and used to inform the EIS as would have been good practice. ii. Nearshore: Sei whales. Seven seasons of fieldwork on Endangered sei whales in the Berkeley Sound area have been conducted (each year except 2018). Despite this, it is repeatedly stated in the EIS that information on cetaceans in that area is scant (see detailed comments below). Only Weir (2017) is expanded upon in Section 7.4.6, with	

Reference	Representation	Navitas response
	subsequent data either omitted or briefly mentioned. Consequently, there is significant under-representation of the importance of Berkeley Sound for sei whales. With regard to the criteria for determining sensitivity provided in Section 8.5.2.1: o The species is of high global conservation concern (IUCN: Endangered); o The numbers using nearshore FI waters are globally significant according to IUCN thresholds (see Weir, 2021 – KBA assessment) and the 1% thresholds applied in the EIS (Table 8.1); o The numbers using Berkeley Sound specifically are almost certainly also of global significance – over 400 individuals have been photo-identified in Berkeley Sound between 2017 and 2021 (excluding 2018, see Weir, 2022) which is 0.5% of the estimated global all-age population in the IUCN Red List assessment. (It is realistic that this value may double to 1% once the 2022–2024 data are analysed); o Mother-calf pairs of sei whales inside Berkeley Sound have been documented (Weir 2022), indicating that lactating adults and newly weaned juveniles also forage at the site. Moreover, Berkeley Sound is the only location globally where sei whale singing are not recognised within the EIS in the context of threats such as noise, entanglement, vessel strike or disruption of prey species. o There are important conservation habitats (KBA and IMMA) for the species in the FI, including Berkeley Sound, which should warrant a 'Very High' sensitivity (Table 8.1); o Their seasonality has been well documented from a 2-yr acoustic programme and effort-related visual datasets collected from 2017-2024 (see Cerchio et al., 2022; Weir et al., 2019; Weir, 2022). However, the EIS has focussed on presenting anecdotal and unconfirmed interview data as the supporting temporal information; o Their occurrence in the FI represents critical periods of the species lifecycle, specifically feeding (Weir, 2017; Weir et al., 2019; Weir, 2022) and reproductive behaviour (singing: Cerchio and Weir, 2022). The fact that sei whales use Berkeley Sound as a foraging ground has not been appropriately recognised in this EIS (apart from brief mentions on	

Reference	Representation	Navitas response
	p.444/454/697, but it isn't considered in the context of sensitivity to noise etc). Potential impacts on prey species (especially Munida, but also Themisto and other species – see Jackson et al. 2022a for a full list of documented prey species) should therefore be expected to have indirect impacts on sei whales too, because the occurrence of those species inside Berkeley Sound is the primary reason why sei whales are present. This link hasn't been considered. o Nearshore & offshore: Southern right whales (SRWs). The importance of nearshore FI waters for wintering SRW aggregations has been largely omitted from the EIS, despite five years of research widely known within the local community. It is repeatedly stated within the EIS that the winter of 2017 saw an 'unprecedented influx' of SRWs. However, it is widely understood that coastal right whale aggregations have formed every year since. The evidence-base is extensive (boat surveys, aerial surveys, telemetry work), such that the nearshore waters in the north-east of the Falklands have been recently recognised as an IMMA for wintering southern right whales. The EIS fails to distinguish between the different uses of the FI by SRWs (which means that their occurrence at the Sea Lion field and in Berkeley Sound is in different seasons and for different behaviours), comprising: (1) a winter breeding/socialising area in coastal waters; (2) occurrence in pelagic waters perhaps year-round for foraging (and probably used also by SRWs from the South African breeding area: Vermeulen et al., 2023); and (3) seasonal use in spring and autumn while making movements between wintering and foraging areas. Much of this is explained in the literature (Weir and Stanworth, 2019) and updated more recently in International Whaling Commission papers (Weir, 2021, 2024), yet these sources are not used. SRW has been treated as a species that just occasionally passes through the Berkeley Sound area (e.g., lumped with minke whales in Table 1.3 on P63), rather than as a KES for which nearshore FI waters (including Port William and Berkeley Sound) comprise a globally significant wintering area. The following details are relevant with regard to the criteria for determining sensitivity provided in Section 8.5.2.1: o The species has an IUCN conservation status of Least Concern;	

Reference	Representation	Navitas response
	however, the south-west Atlantic population of SRWs is of regional conservation concern and there is an International Whaling Commission Conservation Management Plan (IWC-CMP) in place which is not mentioned in the EIS. Moreover, >1% of the global population occurring in FI waters would warrant a 'Very High' sensitivity category (P539/540) – this is the case for SRWs in the FI; o The numbers using nearshore FI waters are globally significant according to IUCN thresholds (results from 2023-2024 aerial surveys, available by Dec 2024) and will form the basis for a forthcoming KBA application; o There is an important conservation habitat (IMMA – see below) recognised for the species that includes Berkeley Sound which should warrant a 'Very High' sensitivity (Table 8.1); The annual (winter) and seasonal (mid-May to early September) aggregations in nearshore FI waters (including Port William and Berkeley Sound) has been well documented using a 2-yr acoustic programme (Cerchio et al. 2022), satellite tracking (Falklands Conservation website), and effort-related visual datasets collected from 2017-2024 (Weir, 2021, 2022, 2024), yet the EIS repeatedly refers to an 'unprecedented' influx of SRWs in 2017 and does not acknowledge them as being an important KES in Berkeley Sound; o Their occurrence in the FI represents critical periods of the species lifecycle, specifically reproductive (mating and singing) behaviour (Cerchio et al. 2022; Weir, 2021, 2022, 2024) which are sensitive to underwater noise (see Cerhio et al., 2022 for example) and other disturbances.	
FC 81	Whale Omission of relevant data. The use of 'pers. comms.' and 'pers. obs.' has been widely applied within the EIS for cetaceans. While these are legitimate data sources, they should not be used as substitutes for available peer-reviewed and published information where available. Little or none of the published data or accessible telemetry data for SRWs and omission of the single most robust available report on whale occurrence in the Islands (distribution and seasonality during boat surveys; photo-identification (movements, fidelity); diet (faecal analysis	Noted. References will be updated but please note that Navitas also consider pers. com. from experts to be valid. Please also note: Navitas invited the respondent to a dedicated scoping consultation session (see emails on November 17th and 27th 2023) and specifically asked for any data that may be considered relevant to the EIA process. The invitation to participate in scoping was declined.

Reference	Representation	Navitas response
	and stable isotopes); genetics, suction cup tagging, and passive acoustic monitoring (seasonality, singing, behaviour) which has been available since 2022 (Weir, 2022) and none of the distribution or effort-related seasonal data are represented appropriately. Recognition of publicly accessible satellite telemetry data for whales is included on P444, yet no reference to the movements or maps is made elsewhere in the EIS, and although the telemetry data reveal extensive use of Berkeley Sound over weeks by individual sei whales then they are described elsewhere in the EIS as only using the area in transit (P453). The identification of KES is critical to the EIS and should use the evidence base available.	
FC 82	Whale entanglement risk. There has been little or no recognition of the risks of cetacean entanglement in mooring equipment in the EIS. It should be recognised that anything in the water column (cables, ropes, lines, chains), particularly anything with slack around tides, has the potential to entangle whales. This includes gear that is looped off the seabed. There are numerous documented examples of whale entanglements, including in deep habitats (where sperm whales can become stuck in underwater cables) and in shallow habitats (most commonly vessel and aquaculture mooring gear, and fixed fishing gear such as pots and gillnets). While entanglement should be considered for all aspects of the project, it is especially pertinent to the Berkeley Sound area which is used by foraging sei whales (with vulnerable subsurface lunge feeding) and breeding southern right whales (Eubalaena species are highly vulnerable to entanglements, see published literature). Entanglement is both a welfare issue (when whales swim off carrying equipment) and likely to lead to mortality (by drowning or subsequent injury infections). It wasn't possible from the EIA to properly understand how the moorings would work for various vessels, but entanglement consideration should be made in the planning of these. We would also recommend that a clear and transparent reporting system for large whale entanglements is introduced, such that expert advice can be sought for handing live entangled animals and the corpses of dead animals can be recovered for sampling/analysis.	The lines that will be placed in the water for the Sea Lion project include flowlines, risers and anchor chains. All of these are substantial and solid pieces of equipment, which Navitas believe pose a very low risk of entanglement to marine mammals. However, the requirement for such a Whale Collision and Entanglement Plan will be considered upon completion of the entanglement risk assessment which will be included in Section 10.11.

Reference	Representation	Navitas response
FC 83	Vessel collisions. The sections on vessel collisions make no acknowledgement of the fact that a Code of Conduct (endorsed by FIG) already exists for the FI and provides guidance on suitable speeds, wide berths etc for avoiding injurious/fatal collision with whales. The EIS has omitted small cetaceans from the vessel collision risk assessment, which is inappropriate considering there are documented mortalities of dolphins from vessel strike in the FI (see detailed comments below). With regard to nearshore wintering SRW aggregations, reducing the risk of vessel collision (considering there are 16 hrs of darkness in winter during which visual observation will not be valid) would benefit from an expanded 'reduce vessel speed' (10 knots) zone between 1 June and 31 August to 10 km from the coast to match the IMMA and telemetry data showing highest-use habitats. This would greatly improve confidence that the vulnerable surface groups of mating SRWs which occur out from the coast would be at lower risk of a fatal collision, and would be a better all round mitigation approach than the use of SMMOs (especially at night).	The Falkland Islands Code of Conduct will be added and referenced here. An assessment of vessel collisions with small cetaceans will be undertaken and added to the next revision of the EIS. Navitas agree that speed restrictions are the most effective mitigation against vessel collisions with marine mammals and propose reducing speed to 10 knots at the pMMA boundary (as industry standard mitigation (Section 10.11.5)) and then 8 knots within Berkeley Sound (as project-specific mitigation (Section 10.11.7)). The IMMA boundary has not been proposed as the limit for the speed restrictions as it is not a statutory boundary and the boundary may change over time.
FC 84	As a general comment, there is a heavy reliance on SMMOs for all of the mitigation listed for vessel collision, but there are obvious limitations with this: (1) SMMOs cannot see in the dark, and especially in winter then it is dark for two-thirds of the time; (2) SMMOs are engaged in simultaneous seabird observations (in a strip transect on one side of the boat if ESAS methods are being used) which means that they are not looking in a concentrated manner ahead of the boat on both sides as would be optimal for cetacean detection; (3) the weather is likely to be unsuitable most of the time in offshore areas for reliably detecting whales; and (4) whales are submerged for most of the time and may surface unpredictably close to a ship when it is too late to respond. The use of SMMOs is definitely preferable to no-one looking, but these limitations do need to be factored in. Mitigating vessel strike is not an easy thing to achieve.	Navitas agree that the best mitigation for collisions is speed reductions and propose reducing speed to10 knots at the pMMA boundary (as industry standard mitigation (Section 10.11.5)) and then 8 knots within Berkeley Sound (as project-specific mitigation (Section 10.11.7)).
FC 85	Cumulative Impacts. Section 13 (3 pages) is inadequate. See detailed comments for examples.	Noted, see below for detailed response.

Reference	Representation	Navitas response
FC 86	The blue whale is recorded within the Falklands and has an IUCN status of Endangered, so there are actually two Endangered species of cetacean known in the Islands. The southern right whale is also of regional conservation concern (IWC-CMP) and, given their documented abundance in the FI, should also be listed here as a key marine mammal sensitivity in the FI. Given the lack of knowledge of the seasonality of almost all of the cetaceans in offshore waters, it is not clear why the monthly sensitivity (low, medium high) has been assigned. Certainly, key sensitive species such as sperm whale (Vulnerable) are present year-round (as is recognised on P429) and therefore the marine mammal sensitivity would better be considered high year-round. It is difficult to understand the shading for low/medium/high on Table 7.57, because the colours of the key at the top does not match the actual shading provided for the species.	Thank you for the comments. Navitas consider the assessment to be precautionary based on the activity, and risks. The text on blue whales, and the colours in Table 1.2 and Table 7.57 will be amended. In addition, SMMOs will be deployed on vessels developing the field for three years pre first oil in order to collect further data.
FC 87	Marine mammals: There is very good information available on the seasonality of sensitive marine mammals in Berkeley Sound, which is not reflected here. The months from December through June should all be marked as high sensitivity for sei whales which are an endangered species which forage in this area throughout those months. The southern right whale aggregates in nearshore waters including Port William and Berkeley Sound from mid-May through to early September. The SRW uses this area for breeding purposes, and the SW Atlantic population is of regional conservation concern (IWC-CMP) - this species should be recognised as a KES within Berkeley Sound. Therefore, the entire period from December through to early September is of high sensitivity for baleen whales in Berkeley Sound (and adjacent waters), and these Tables should be revised accordingly. • Commerson's and Peale's dolphins do breed in Berkeley Sound (i.e. this is a 'definite' not a 'likely'). • The influx of SRW in 2017 was not 'unprecedented' as stated in the Table – it has been repeated every year since. • Conservation sites: this table does not recognise that Berkeley Sound is	Noted, tables will be revised.

Reference	Representation	Navitas response
	part of three internationally-important sites for marine mammals – one KBA and two IMMAs.	
FC 88	Entanglement of cetaceans in mooring apparatus should be added to 'Environmental aspects' and considered in relevant Tables (e.g. 1.5, 1.6, 1.9, 2.2 etc.). The locations shown in Figure 5.5.2 (Section 5.5.1) are within high-use habitats for both sei whales and southern right whales (indicated by FC vessel data, aerial surveys, acoustic monitoring and satellite-tracking). Since the mooring locations seem to have some flexibility, it would be useful if consultation regarding anchorage locations also included whale experts in addition to FIMA/Fisheries in order to minimise disruption to both humans and whales. Same comment for P684 and P697.	This will be added to the Enviid chapter (Chapter 9) tables, and the NTS with an assessment included in Chapter 10.11. Such consultations will be considered in discussion with FIG. See also FC 82.
FC 89	We suggest that the production of a Whale Collision and Entanglement Management Plan would be appropriate in order to raise awareness of these topics and of the sensitivity of local whale populations and to communicate commitments clearly to all key personnel.	Navitas will consider any additional credible measures and the requirement for such a report upon completion of the entanglement risk assessment (see FC 82, FC 88). Navitas is committed to following the Falkland Islands cetacean code of conduct.
FC 90	Discussion "on the EIA requirements for the construction of any new facilities will be held with FIG prior to the submission of the relevant planning applications / requests for extension of existing planning permission." We take the opportunity here to highlight that pile-driving and other loud impulsive noise sources associated with construction has the potential to injure and disturb dolphins and other marine mammals within Stanley Harbour, and FC would seek reassurance that appropriate mitigation (i.e. the JNCC piling guidelines) would be followed during activities associated with Temporary Dock Facility (TDF) construction/expansion. Especially since on P248 it states that "the full environmental baseline of Stanley Harbour is provided in the EIS previously submitted to support the construction of the Temporary Dock Facility (NEFL, 2013)" and so possibly an EIA/EIS has already been submitted for this? FC and SAERI have collected considerable data on dolphin sensitivity within Stanley Harbour in recent years that should be used to inform mitigation.	No pile driving will be required for the TDF causeway upgrade works. The previous EIS which is referred to is that of the one developed by Noble Energy Falklands Ltd for the original siting of the TDF.

Reference	Representation	Navitas response
FC 91	It is stated that the FI Data Portal has been consulted for the literature review. Metadata for the whale projects has been submitted to the Data Portal, yet whale information since 2017 is hardly represented in the EIS and FC has not been approached to discuss whale sensitivities.	Thank you from the comment. Metadata, such as that on the data portal, is information about data and does not contain raw data in a usable format. The baseline was constructed on published papers and data collected via research commissioned by Navitas. Please note: Navitas invited the respondent to a dedicated scoping consultation session (see emails on November 17th and 27th 2023) and specifically asked for any data that may be considered relevant to the EIA process. The invitation to participate in scoping was declined.
FC 92	"It is believed that many of the baleen whales recorded offshore within Falkland Islands waters are on passage …" As an important deduction this statement needs a reference. It may in fact be likely that sei whales and right whales forage routinely in offshore FI waters (i.e. it's a destination rather than just passing through) as shown by e.g. whaling catch data, Zerbini satellite data papers, etc. "It is thought that the productive inshore waters around the Falkland Islands (including Berkeley Sound) are of importance as feeding areas". Again, a reference would be needed. There are eight years of data demonstrating the importance of Berkeley Sound (and other areas) as a feeding area for sei whales. Additionally, the KBA and IMMA designated for sei whales both recognise the global importance of inshore FI waters as a feeding ground for this species.	Noted. The suggested references will be included. Navitas note that not all of the data to which the respondent refers is readily available. As noted elsewhere, the respondent was invited to a dedicated scoping session for this EIS and was also asked whether it had data relevant to the EIA (see emails sent on 17th and 27th November 2023) but the invitation was declined.
FC 93	This subheading should be 'relative abundance' not abundance as it does not describe actual abundance. • "However, the age of the dataset, and inherent limitations associated with at-sea surveys, raise uncertainty as to how representative it is of present day populations." While the reliance on White et al. (2002) is understandable (given the total absence of other effort-related data from offshore areas) it is clear that it does not represent contemporary populations (as highlighted at the July FIOHEF meeting) and this should be given greater acknowledgement in the EIS. For example, the White et al. (2002) report includes only 31 sightings of sei whales and 5 sightings of southern right whales from three years of year-round survey effort	Thank you for the comments. Relative Abundance will be added. See previous responses on the age the SAST dataset (FC 7, FC 28). This is acknowledged. Also see previous comments on the AMAR data (FC 129). Note that SMMOs will be deployed for three years prior to first oil. Metadata, such as that on the data portal, is information about data and does not contain raw data in a usable format. The baseline was constructed on published papers and data collected via research commissioned by Navitas. Figure 7-78 will be reviewed.

Reference	Representation	Navitas response
	(both coastal and offshore). Currently, those numbers can be exceeded in a single day in Berkeley Sound area. There has obviously been substantial changes in whale populations over the 20 years since that report, and those sensitivities are simply not reflected in this EIS. • The Hipsey et al. (2013) report analysed only 5% of the one year of acoustic data collected at Sea Lion. It isn't clear why only 5% of that potentially very informative dataset has been analysed, especially when the EIS acknowledges (P422) that recent improvements in knowledge of species calls may mean that the Sea Lion acoustic dataset contains records of species hitherto overlooked. Since this dataset potentially comprises the best available source of information on the temporal occurrence of cetaceans at the exact location of the oil field, it is a pity that the other 95% has never been analysed and especially in light of recent findings (such as sei whale song – Cerchio and Weir 2022). • Figure 7-78: Using percentage to allocate months of importance for species for which there are few sightings is inappropriate and misleading. And also, this must be number of individuals not number of sightings as stated in the legend. Because White et al. (2002) reported only five sightings of southern right whales in total.	
FC 94	"Additionally, there is limited knowledge regarding the range of vocalisations produced by each species. For example, Hipsey et al. (2013) did not record any sei whales, although they are known to be regularly sighted during visual surveys". The study did record sei whales at the Sea Lion field, they just incorrectly assigned those vocalisations to leopard seals (this should be corrected in Table 7.27). See Cerchio and Weir (2022). As there have not been regular visual surveys in the areas of the acoustic deployments the source of the 'regularly sighted' statement is unclear. The presence of sei whale song at the Sea Lion field needs to be acknowledged in the EIS, as it implies higher acoustic sensitivity and sensitive behaviour of an Endangered species in the vicinity of a drilling operation and FPSO.	The sei whale / leopard seal vocalisations are a matter for debate. The Cerchio and Weir (2022) paper acknowledge that leopard seals can't be ruled out they but they 'consider that their spectrograms illustrate portions of sei whale song rather than aberrant leopard seal calls.' The paper suggest that leopard seals are not common in the Falklands based on surveys in Berkeley Sound. Leopard seals are very regular visitors to the island are regularity seen around our coasts and at sea. Nonetheless, the text will be reviewed with respect to recent work conducted on Berkeley Sound. Based on the information that is available Navitas is confident in the marine mammal assessment. Note that SMMOs will be deployed prior to first oil in addition Navitas has committed to using hydrophones on the field.
FC 95	It would be good to have the summary table (sightings and individuals) of species recorded during the MMO seismic datasets, since the same	Navitas consider that these data are summarised in an adequate way. These data are summarised in the text and considered in the assessments. These reports are available on request.

Reference	Representation	Navitas response
	has been provided for White et al. (2002) and Hipsey et al. (2013). Which species were recorded by MMOs would be relevant.	
FC 96	The information presented here on southern right whales (SRWs) is very out of date. SRWs in the SW Atlantic were increasing, but in recent years that increase has levelled off (see papers by Crespo et al.) due to high calf mortalities and some mortalities also of adults. Consequently, since 2012 the SW Atlantic population of SRWs has been the subject of an International Whaling Commission (IWC) Conservation Management Plan (CMP) – see https://iwc.int/south-atlantic-southern-right-whale The regional conservation status of this population is therefore of higher concern (translating to higher sensitivity) than the species as a whole (globally Least Concern) which has not been acknowledged in the EIS. • "The migratory behaviour of southern right whales suggests that animals may travel through Falklands waters on passage between their Patagonian spring breeding grounds and summer feeding grounds near South Georgia and Antarctica." This over-simplification is unhelpful for determining how any development should proceed sensitively. Whaling catches and satellite tracking show that SRWs utilise the entire SW Atlantic region – they aren't only breeding in Patagonia and they don't only feed in SG/Antarctica. They probably forage in pelagic FI waters year-round as well as using the area during migrations and, especially, as a wintering destination (for breeding and socialising) in nearshore waters around the FI. • "During the winter of 2017, an unusually high number of southern right whales was recorded in coastal waters around East Falkland (Section 7.4.6.3.1.1). This adds to the evidence of significant inter-annual variation in the number of these animals present within Falklands waters." Again, this is over-simplified. The winter of 2017 was the first year that a wintering aggregation was documented. However, it can no longer be considered 'unusual' but in fact occurs persistently every year – one of the reasons that an IMMA was identified for the species.	Thank you for the comment. The text will be updated with references accordingly. Please note that the SRW tracking data is not readily available, specifically for work conducted in the Falkland Islands.
FC 97	"Conversely, analysis of the acoustic data from the Sea Lion area did not contain any confirmed sei whale calls. … Acoustic detection of sei whales is further hampered by the absence of sei whale call descriptions	See responses to FC 94 for detail on sei / leopard seal calls. The text will be reviewed with respect to recent work conducted on Berkeley Sound.

Reference	Representation	Navitas response
	for the South Atlantic." This information is two years out of date. Sei whale song was shown in spectrograms in the Hipsey et al. (2013) report but unfortunately, they reported them as leopard seal vocalisations. The repertoire of acoustic signals produced by SW Atlantic sei whales was published in 2022 and actually relates specifically to Berkeley Sound. The sei whale is now the best acoustically characterised species in the Falklands. See Cerchio and Weir (2022) and also the acoustic chapter by Cerchio et al. in Weir et al. (2022). The full one-year acoustic dataset from Sea Lion could (and should) be re-analysed in this context, because the presence of sei whale song (linked to reproductive behaviour) in the Sea Lion oil field is a significant finding with regard to mitigation and sensitivity. "Three recent projects have surveyed the distribution of sei whales, and other cetaceans, in inshore waters (Thomson and Munro, 2014, Weir, 2017; Costa and Cazzola, 2018). The preliminary results and anecdotal observations…." This statement is out of date. Eight years of boat-based surveys, aerial surveys, three years of 24/7 acoustic monitoring, diet analysis, genetic analysis, satellite-tracking and stranding attendance has been conducted. Much of this is available online.	
FC 98	Two species of minke whale occur around the Falklands, and it isn't clear why this section focuses only on one of them. Same comment for Table 7.28, and for the summary on P454. At least one stranding in the FI has been genetically confirmed as B. acutorostrata not B. bonaerensis (C. Weir, pers. comm.). Humpback whales are not rare around the Falklands anymore – this information is out of date and does not represent what is currently known of species occurrence. Same comment for P455.	Noted. The text will be updated accordingly. See also FIFD 28.
FC 99	"Pilot whales were recorded on approximately 35 days throughout the year-long monitoring period (Hipsey et al., 2013)" This is a meaningless/misleading statement considering that only 5% of the dataset was analysed.	See responses to FC 129 on the AMAR methodology. Currently there are no data to support Southern bottlenose whales (and beaked whales in general) abundance / distribution in the NFB. The pilot whale diving detail will be updated.

Reference	Representation	Navitas response
	Southern bottlenose whales (and beaked whales in general) are almost certainly in the NFB year-round, given what we know of the site fidelity of beaked whale species globally. The fact they were not recorded in winter doubtlessly reflects weather conditions or is just a chance result (as the sighting rate of this species is anyway very low). Describing Long Finned pilot whales as 'shallow divers' is incorrect. Pilot whales are very capable divers reaching 1000 m – there are numerous published papers to support this.	
FC 100	"This was subsequently supported by satellite tagging efforts by Falklands Conservation, which although preliminary (see https://falklandsconservation.com/sei-whale-tracking/), revealed long-distance movements of sei whales, both around the Falkland Islands and between the Falkland Islands and South America." This is incorrect, none of the tagged sei whales went to South America.	This will be checked and updated where necessary. However, Weir et al. (2019) report on migratory movement of a single sei whale between Brazil and the Falkland Islands based on photo identification. The text will be updated accordingly.
FC 101	The figure legend refers to section 1.5.2.3.4 but that section does not actually seem to exist in the report.	This reference will be removed.
FC 102	"Notably, of the species that are regularly observed within Berkeley Sound, sei whales are listed as 'Endangered' on the IUCN Red List…and all other cetaceans, are listed as species of conservation priority and are the subject of a Falkland Islands Cetacean Management Plan (FIG, 2008c)". They are not the focus of a FI CMP – cetaceans did have a Species Action Plan but it expired in 2018 and has not been renewed. This information also fails to acknowledge the SRW and the IWC-CMP that exists for the population. "For many years large numbers of sei whales (B. borealis) have been observed in inshore waters around the Falkland Islands (White et al., 2002; Frans and Augé, 2016)". White et al. (2002) reported only 31 sightings in three years. "However, photo-identification within Berkeley Sound indicates that the animals are transitory with most animals spending a short period of time within Berkeley Sound (Weir, 2017)." This does not reflect current	Noted. Navitas will clarify and update references to reflect recent tracking work where it is possible. Note that these data are not readily available.

Reference	Representation	Navitas response
	knowledge. Publicly available satellite-tracking for sei whales show sei whales remaining within Berkeley Sound continuously for periods of several weeks. This has to supersede the one-season of photo-ID data assessed in Weir (2017). More recent photo-ID data shows some individuals remaining a longer too (see photo-ID chapter in Weir, 2022).	
FC 103	Sightings of fin whales in inshore waters are not supported (Weir, 2017). The report is that there aren't any confirmed (i.e., supplemented with photographs, video or genetic data) sightings of fin whales in inshore waters. Moreover, two years of acoustic monitoring in Berkeley Sound did not yield fin whale detection. Continuing to suggest that fin whales are common in Berkeley Sound is misleading. Given fin whales are an IUCN Vulnerable species, it isn't helpful for the industry if they are reported in the EIS as being present. "Once they arrive on their feeding grounds, southern right whales (Eubalanus australis) tend to be found in coastal or inshore waters (c.f. Black, 2005b)". This is likely incorrect. The feeding grounds of SRWs mostly comprise pelagic mid-latitude regions, including the outer Patagonian Shelf, the Argentine Basin, the subantarctic Islands etc. Not that many feeding grounds are located close to shore – this is the premise for most of the current satellite-tracking work going on for SRWs globally, aimed at locating their pelagic foraging areas. The whole section on SRWs under-represents what we know about the species in the FI currently and requires a major overhaul to properly reflect that species' occurrence and sensitivity. There is no recognition that SRWs aggregate in nearshore FI waters every year in winter for breeding and socialising, that satellite-tracking has revealed the durations that they stay on the FI coast, that they are part of the SW Atlantic population for which the IWC CMP exists, that their occurrence has warranted an IMMA, that the same animals return in different years, that Berkeley Sound is an important breeding habitat, etc.	Fin whale - Weir (2017), while a valuable study, is not the only, nor definitive, cetacean sighting information available for the Falkland Islands. Indeed, Weir (2022) states that 'Fin whales (Balaenoptera physalus) have been anecdotally reported in coastal areas around the Falkland Islands, in some areas frequently enough to suggest that their occurrence might support a Key Biodiversity Area (e.g. Frans and Augé, 2016; Taylor et al. 2016). However, there is some debate over whether they actually occur on a regular basis in nearshore waters or if reported sightings are in fact misidentified sei whales (see Weir, 2017).' Given this debate is ongoing, it is both prudent and precautionary to include fin whales. Southern Right Whale - noted, Navitas will clarify and update references.
FC 104	"Although there are no known records from Berkeley Sound, killer whales may visit the area". Killer whales were confirmed during the DOKE project around Kidney Island and FC has seen them inside	Noted. Navitas Will update references.

Reference	Representation	Navitas response
	Berkeley Sound and around Volunteer Point (see social media posts), local landowners (e.g. Adrian Lowe) have reported them anecdotally, etc. The Peale's dolphin section for some reason focuses on the 20-year-old JNCC surveys, while not citing at all recent information in Weir (2017, 2018) or Baines & Weir (2020). The same is true of the Commerson's dolphin section on P456.	
FC 105	The behaviour column contains a high number of inaccuracies. • SRW seasonality should be updated to reflect work done since 2019. See earlier points. • Fin whales: see previous comment. • Minke whales are not 'regularly sighted', occasional at best. • Humpback whales – They have been reported in Berkeley Sound. See Weir et al. (2022) report. • Killer whales - See comment above.	Noted. Will update where relevant.
FC 106	SRWs, fur seals and elephant seals have also been seen inside Stanley Harbour on occasion. Commerson's dolphins are significantly more common inside Stanley Harbour than Peale's dolphins – the distribution of the latter normally ends at The Narrows and we have seen them only very occasionally inside the Harbour itself. This section could be improved to make it clear that Commerson's dolphins and sea lions are the main sensitivities within the Harbour, with the other species far less common.	Noted. Will update where relevant.
FC 107	This section (and subsequently Sections 7.5.2.3 and 7.6.2.1) fails to mention the IMMAs that are in existence for whales in the Falklands. Plus two additional IMMAs for elephant seals. As IMMAs are equivalent processes to IPAs and IBAs and are relevant to Berkeley Sound then they should be considered.	Noted. Reference to IMMA will be included in the section. Navitas note that the IMMA overlaps with the KBA, so there is multiple non-statutory designations overlapping one another, in the context of whales, based on the same data. IMMA and KBA boundaries are subject to change, as more data becomes available, and methods are improved.
FC 108	It is not clear why some have ticks for an Action Plan (AP) plan required and others don't. If they are identified as conservation concern, then logically all might need an AP. There is no AP currently adopted by FIG solely for dolphins, and the globally Endangered sei whale should certainly be a priority species requiring an AP. APs in the past have been	Comment for FIG in terms of the status of Species Action Plans identified in the 2008 State of the Environment report. Navitas can update the table with the most recent cetacean action plan.

Reference	Representation	Navitas response
	for all cetacean species grouped together, and currently none are valid beyond 2018.	
FC 109	"While a range of taxa may be impacted by an oil spill, the assessment was predominantly based upon colonial seabirds for which census data are available." This seems inadequate with regard to sei whales and southern right whales for which extensive data are now available and which are species of global and regional conservation concern respectively. The potential impacts of oil spills (in all areas but especially in coastal high-use habitats) on baleen whales is not appropriately considered in this EIS.	Navitas would contest that there is extensive data available. Metadata, such as that on the data portal, is information about data and does not contain raw data in a usable format. The baseline was constructed on published papers and data collected via research commissioned by Navitas. Please note: Navitas invited the respondent to a dedicated scoping consultation session (see emails on November 17th and 27th 2023) and specifically asked for any data that may be considered relevant to the EIA process. The invitation to participate in scoping was declined. Please note: only MGO will be used inshore by project vessels and project activities are small in scale and duration when considered alongside all other existing activity within Berkeley Sound.
FC 110	Cumulative impacts are very difficult to measure and are likely to be complex. It should be acknowledged that Berkeley Sound is already an intermittently busy (with vessel traffic) and noisy environment for baleen whales, and that additional noise and traffic would need to be interpreted in a cumulative and additive context with that already present. Chapter 13 essentially consists of 2 pages in which both seabirds and marine mammals are evidenced as having the highest potential exposure to cumulative impacts but are not considered further.	Cumulative impacts are challenging to appropriately assess - following suggestion from SAMS, Navitas has qualitatively colour-coded the cumulative impacts to help present the impacts and risks, whist acknowledging this is a difficult thing to assess accurately.
FC 111	In the list of 'environmental aspects' for the routes that activities might interact with the environment, no mention was made about the placement of objects in the water column – such as mooring lines, ropes, chains etc. Yet these have the potential to entangle whales. This risk has not been identified in this risk assessment.	The lines that will be placed in the water for the Sea Lion project include flowlines, risers and anchor chains. All of these are substantial and solid pieces of equipment, which Navitas believe pose a very low risk of entanglement to marine mammals. However, it is recognised that whale entanglement in anchor chains does occur, so a Whale Entanglement Management Plan will be put in place. Further detail on entanglement will be included in section 10.11.
FC 112	Under 'large dropped objects', marine mammals have not been identified as a potential receptor. It should be noted that in other sensitive areas (e.g. the Beatrice field in the Moray Firth) then MMOs and PAM have been used during anchor-handling operations to limit impacts on cetaceans. As unlikely a risk as this might seem, it is acknowledged	Suction Anchors will be lowered in a controlled manner from a dedicated Offshore Construction Vessel (OCV) as will the MODU's pre-layed moorings (which will be paid out by the AHTS.) Both operations are standard offshore practice. MMOs will be aboard the vessels and shall monitor the area prior to the operation commencing. The highly unlikely

Reference	Representation	Navitas response
	elsewhere and cetaceans were present in the pre-watches around the Beatrice anchor-handling tugs. Consequently, this risk could be recognised here, especially when Endangered species (sei and blue whales) might occur in the offshore oil field. It could be mitigated simply by having a dedicated crew member on the tug look for whales before deploying any large mooring anchors (or other large objects). Although that would not help if performed during the dark. Chemicals and drill cuttings and oil spills offshore – Section 10.6 and 10.7. If these affect plankton, fish and squid, then they should be considered to affect the species that predate those prey groups. Artificial lighting offshore – Marine mammals are flagged here as requiring further assessment in relation to artificial light, but then no assessment is provided in Section 10.1 beyond two sentences on P597 and one sentence in P607. It is not clear if that is the extent of the assessment.	risk is therefore mitigated to as low as reasonably practical. The assessment results in 'Low' and 'Very low' impacts to plankton, fish and squid from chemicals, drill cuttings and oil spills offshore. As the impacts are Low/Very low, impacts up the food chain are not considered further. Additionally, the area impacted is very small relative to the whole foraging area of species up the food chain. This is a typo, marine mammals will be removed from the table in Section 9.1.
FC 113	Inshore physical presence is relevant to whales too – it excludes them from that area. The LTVs are around 160 m long (P172) which is large, and there will be two of them at a time. It's probably a relatively small effect alone, but in the context of all the other traffic already using Berkeley Sound then it should be acknowledged, especially if the LTVs anchor in a preferred whale foraging hotspot within Berkeley Sound. Artificial Light is considered to require further assessment for marine mammals in Offshore but is not flagged here for Inshore. Even though on P592 Inshore is flagged. The potential for attracting marine mammals may be higher inshore because of the specific case of foraging sei whales inside Berkeley Sound. If Munida is attracted to light (P596) and that sei whales use Berkeley Sound as a foraging area with Munida as a key prey species (Buss et al., 2019; Jackson et al., 2022 in Weir, 2022), then it should be considered likely that sei whales may also be indirectly attracted to vessel lights in Berkeley Sound at night. Thus inadvertently increasing their potential exposure to noise (briefly acknowledged on	Navitas calculate that the LTVs physical presence in Berkeley Sound will take up 0.004% of the area available, which Navitas do not consider to be significant. The literature will be reviewed and Section 10.1 will be updated as necessary. Of note: marine mammal occurrence will be monitored and recorded by SMMO's as stated in the EMMP.

Reference	Representation	Navitas response
	P607) and vessel strike. This likelihood isn't highlighted anywhere in the EIS with specificity to the clear case of the sei whale–Munida situation within Berkeley Sound.	
FC 114	There is no mention of Underwater Noise or Vessel Collision associated with the FIPASS/TDF facility, even though the Table considers physical presence of vessels at those facilities and there is acceptance that vessel traffic within the port will increase in association with OGP operations. Commerson's dolphins (and pinnipeds) are very common around FIPASS and the TDF, and there is already a documented instance of a launch striking and killing a Commerson's dolphin while coming alongside at FIPASS (S. Cartwright, pers. comm). The FI Code of Conduct for Cetaceans (adopted by FIG) highlights vessel manoeuvres within ports as a clear risk for dolphin strikes. It is not clear why increase in noise and vessel strike has not been included as a risk for marine mammals here.	Noted, this will be included.
FC 115	"The current schedule expects that, during Stage 1, a maximum of two LTVs will be present in Berkeley Sound for only eight months (c. August-2022 to end March-2023), which supports the target of avoiding competition for sea room during the peak fishing period" These dates have expired, and so it isn't clear what months/years the LTVs are expected to be present as part of Stage 1 now. No indicative dates are provided here for Stage 2. The stated priority for planning is to avoid the peak fishing period (P591), even though the spatial overlap with the anchoring areas used by other vessels in Berkeley Sound is minimal (Fig 11-6, P930) and March is one of the busiest months for vessel traffic in Berkeley Sound (Figure 7-118). The single best approach with regard to mitigating potential impacts on baleen whales in Berkeley Sound would be to avoid them in time (since there is clear overlap in space). The documented seasonal peaks for whales in Berkeley Sound includes Feb–Apr for sei whales and Jun–Aug for SRWs. There hasn't been any consideration presented in the EIS for timing operations around those periods to minimise impacts on two important KES species.	The dates (months and year) noted here were included in error. Timings for periods of LTV operations are not yet fixed and consideration will be given to avoiding peak periods, but operational flexibility is required. The vessel traffic associated with the LTV operation represents a very small increase on the general vessel traffic in Berkeley Sound.
FC 116	Not clear why lighting at the TDF/FIPASS included here, when vessels used throughout the operation will visit those port facilities. Presumably	Noted. The TDF/FIPASS will be added to the list of receptors in Section 10.1.3.

Reference	Representation	Navitas response
	lighting at those sites (at least at the TDR) will be expected to increase significantly in association with vessel visits and onshore safety requirements.	
FC 117	"However, despite the growing volume of research this remains an area with many uncertainties, largely due to the difficulties of observing and measuring the impact of noise on animals in the marine environment." This is correct. Yet on P1235 the EMMP indicates that 'any adverse noise-related behaviour of marine mammals' will be investigated. No information is provided on how that will be achieved in practice, given that the limitations of doing so are highlighted here on P650. See below comment for text on P1235 too.	Agreed, this is a challenge. Underwater noise measurements will be undertaken during construction (see section 15.6.2) and SMMOs will be on board vessels to observe behaviour.
FC 118	TTS is also an injury to a marine mammal. From Nowacek et al. (2007): "Both PTS and TTS represent actual changes in the ability of an animal to hear, usually at a particular frequency, whereby it is less sensitive at one or more frequencies as a result of exposure to sound." I.e. TTS can still compromise a cetacean's ability to navigate and find prey, so it should be included here as a potential injury. Same comment for Table 10.18 with regard to defining 'injury threshold.' "it is an offence to intentionally or deliberately disturb any marine mammal in a way which is likely to…Impair its ability to…Survive, reproduce or rear / nurture their young, and / or Migrate… [or] Significantly affect the local distribution or abundance of the species to which it belongs" With regard to noise impacts within Berkeley Sound, it will be difficult to demonstrate that noise impacts from the vessels are not affecting reproductive behaviour (singing activity) by both whale species, potentially affecting the feeding ability of sei whales, and potentially affecting local distribution by displacing whales from important habitats. Especially considering the cumulative impacts of the LTVs anchoring in a different area to all the other vessels within BS, thus causing cumulative disturbance over a wider area.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See also FIFD 54.
FC 119	"In general, sound from drilling has been found to be predominantly low frequency (<1,000 Hz) with relatively low source levels. This appears to be a somewhat best-case and old (1987) example – 'in general' would imply the need for multiple examples to support the statement. There	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation. See also FIFD 54.

Reference	Representation	Navitas response
	must be more recent studies published on sound levels produced by underwater drilling? A study by Greene (1987) quoted in Genesis (2016) found that the sound generated by drilling activities from a semi-submersible did not exceed local ambient levels beyond 1 km". Kyhn et al. (2014) report a drillship working in similar water depths to Sea Lion producing source levels of up to 190 dB re 1 µPa (rms) during maintenance and 184 dB re 1 µPa (rms) during drilling, with noise above ambient levels to a 38 km radius around the source. This section simply does not provide enough detail on the source and sound levels relevant to this specific project in order to assess likely impacts on marine mammals.	
FC 120	"Recoverable injury, refers to injuries, including hair cell damage, minor internal or external bleeding. None of these injuries are likely to cause direct mortality" No, but this is a little disingenuous because a deaf cetacean (at least odontocetes) cannot catch food or navigate, so indirect mortality is a possibility if TTS extends over days/weeks. This could be more objectively presented.	Noted, this will be considered as the underwater noise sections are revised. See also FIFD 54.
FC 121	This is the first mention of 'received noise levels' which is not defined in Table on P654. Received sound levels is a fundamental concept in discussing impacts of noise on marine mammals and should be properly defined. "Note however, that the audiograms for most marine species remain unknown and those that have been published are often derived from a few individuals under artificial conditions." While it is good that this important caveat has been mentioned, more needs to be said. In particular, in the context of baleen whale sensitivities at the NBF.	This will be added to the definitions. Text will be added regarding the baleen whales.
FC 122	The cetacean groups represented here comprise three odontocetes and one baleen whale. So, two cetacean hearing groups. It would be relevant to also include audiograms of beaked whales (as a marine mammal group found in the NFB and with particular sensitivities to human noise)	Noted. This will be amended.

Reference	Representation	Navitas response
	and of NBHF species (audiograms are available for harbour porpoises for example, as a proxy for Peale's/hourglass). Erbe 2002 given in this Figure is not cited in the EIS reference list. Assuming it is this one (https://cradpdf.drdc-rddc.gc.ca/PDFS/unc09/p519661.pdf), it should be noted that this is not a measured audiogram for the humpback whale – it is a predicted one by Houser et al. (2001). Another important point is that some other baleen whale species (including blue, fin and SRWs – all found in the NBHF) may be more specialised for the use of very low frequencies than the humpback whale (see P134 of Southall et al. 2019), and consequently the example of the humpback whale provided in Fig 1-11 may not adequately reflect the sensitivities of those species. It would be better to use Fig 9/10 from Southall et al. (2019) as the best available information on hearing sensitivity in the baleen whale group. No audiograms have been measured for baleen whale species and this is a significant and widely-acknowledged data gap in understanding and modelling noise impacts on baleen whale species (see P134 of Southall et al. 2019 for example). This should be mentioned at the bottom of P662 when discussing baleen whales too. It would be appropriate to label the audiograms in this Figure according to whether they are measured or estimated, to give a better indication of uncertainty. Given that baleen whale sensitivities in the NFB may be high (singing behaviour, conservation status etc), the data available on other baleen whale species should be included here, albeit estimated/modelled. This includes right whales, which is relevant to the NFB. See references on P130 of Southall et al. (2019).	
FC 123	"The auditory range of species can only be determined through field observations, which are extremely difficult for free-ranging animals in the marine environment". It can be determined through field experiments but also by experiments in captivity (for porpoises, dolphins and pinnipeds). It is not possible to 'observe' an auditory range.	Noted, experiments in captivity will be added as examples as the underwater noise sections are revised. See also FIFD 54.

Reference	Representation	Navitas response
FC 124	Blue whale should be added. Beaked whales (as a group) should be added too – its not just bottlenose whales found in the NFB but also Mesoplodon species etc, which are of concern with regard to noise impacts (recognised in Table 10.23).	Noted, this will be amended.
FC 125	"For cetaceans, published TTS data are limited to the bottlenose dolphin and beluga whale" Incorrect, Southall et al. (2019) state two additional NBHF species (i.e. porpoises) which should be included here as proxies for NBHF species found in the NFB (e.g. hourglass dolphins).	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. FIFD 54.
FC 126	The disturbance thresholds presented in Southall et al. (2019) weren't evident.	These are noted in section 10.4.4.3.4.5. Please note the noise chapters are being revised and updated, see FIFD 54.
FC 127	"This is a realistic snapshot of the proposed project, but this could be exceeded at times if a second installation vessel or supply vessel is present" Does two installation vessels mean two simultaneous drilling operations? If so then the cumulative noise impacts for this scenario should also be modelled as a precautionary approach?	An installation vessel refers to a ship which is involved in the construction of the field, there will only be one drilling operation at any one time.
FC 128	"The sound source levels for the Phase 1 & 2 activities were estimated using published data as shown in Figure 10-12 and described in Table 10.26." The drilling operation is not actually shown in Figure 10-12 or in Table 10.26? "The anchored drilling rig when operating has a low noise output, typically some 30 dB lower than the other marine sources present (vessels on dynamic positioning or using propulsion frequently) (DECC, 2011) and will not contribute significantly to noise in the presence of the other vessels noted." It is not clear where is this information presented in the EIS along with the Genesis (2016) report. Relevant information should be provided in the EIS if the report is not public. It would be beneficial for calibrated sound measurements to be made in the field during drilling to verify this information.	This section is being revised to include drilling noise in the model. See FIFD 54. Monitoring of noise offshore will be done, see section 15.6.2.1.1, which will be used to verify this information.
FC 129	"Although there are sightings from various surveys and recordings from an acoustic monitoring study, there are currently no population estimates for any cetacean species in Falkland Islands waters. However, the	The comment on 5% is misleading: Five percent of the AMAR data from each recorder were analysed manually by two trained analysts visually examining spectrograms and

Reference	Representation	Navitas response
	available data do not indicate that the area surrounding the Sea Lion Field is home to resident populations of marine mammals or is a feeding area of overriding importance for any species." As discussed earlier, the sightings surveys are very out of date and the acoustic monitoring report presents only 5% of available data and missed singing sei whales. The "available data" are therefore inappropriate for determining the importance of the Sea Lion field for cetaceans. Independent baseline surveys should be carried out prior to making statements such as this. "Given the lack of population estimates, the proportion of the available habitat within the area of disturbance and avoidance / displacement could be used as a proxy to assess the potential impact on marine mammals. However, the habitat is not uniform throughout Falkland Islands waters and the available information indicates that many species show clear distribution patterns (Section 7.4.6.2)." These sentences lack clarity. The Sea Lion field is on the upper continental slope, an area where water depths increase – slope habitats are usually associated with upwelling, currents and topography that make them some of the most important for marine mammals globally. Indeed, an IMMA is located just north-west of the Sea Lion field. It is likely that beaked whales and some other species such as sperm whales use those slope habitats year-round, and a precautionary approach (in the absence of the necessary field research data) would consider that likely. Thus we may expect behavioural disturbance in a ~20 km radius of the field. The importance of this simply cannot be ascertained, considering the absence of targeted cetacean field studies in that area and information on exact species present, their site fidelity etc (especially with regard to beaked and sperm whales, which often exhibit quite high fidelity to regions of slope).	listening to audio playbacks. For Phase 1, the first 90 seconds of each 30 minute file per AMAR each day were sampled for manual analysis. For Phase 2, the middle 45 seconds of each 13 minute 45 second file was analysed. For Phase 3, the middle 45 seconds of each 12 minute file was analysed. The analysts annotated one call per species per sample for all files and AMARs to record each species in the dataset. This is a considerable amount of work. Navitas believes it has taken a precautionary approach. Also note that SMMOs will be deployed on vessels for three years pre-First oil and will collect data on marine mammals in the area.
FC 130	"This is not, as yet, an established part of marine vessel hire, but may form part of future environmental considerations." As part of the contracting process these mitigations could clearly be requested/implemented in order to minimise noise. Same comment for the relevant text on P680.	All of the offshore support vessels, the FPSO and the MODU (if a DP MODU selected) will have variable pitch propellors. This will be clarified in the post consultation EIS.

Reference	Representation	Navitas response
	"At present, it is not clear whether vessels operating offshore will be equipped with fixed or variable pitch propellors." As above along with same comment for the relevant text on P680. "Although speed restrictions are not proposed offshore, vessels operating in the vicinity of the Sea Lion Field are likely to be operating at low speed" With regard to sperm whales and other sensitive species, speed vessels should be considered offshore as part of collision risk mitigation. Especially at night.	
FC 131	In the absence of information on the noise of the drilling being provided in the EIS, best practice mitigation could be used to check that no marine mammals are close to the source prior to its use. E.g., JNCC Guidelines, requiring a visual/acoustic monitoring period before the drilling commences. This would increase confidence that injury would not occur due to animals present close to the source prior to its initiation.	The JNCC guidelines are more for impulsive noise such as pile driving, or wells using Vertical Seismic Profiling, rather than drilling noise. It is not felt that SMMOs would be an appropriate mitigation here as drilling noise is constant rather than intermittent and impulsive.
FC 132	"It is assumed that animals would move away from the source of noise before being subject to a sound exposure level that would cause injury and therefore the impact of vessel noise is assessed as disturbance (below) rather than the potential for injury." This assumption is one often debated! For example, humans regularly undertake activities known to be dangerous, including exposure to injurious sound levels (e.g., at concerts). It is recognised elsewhere in this EIS that whales might not move away from areas where their food is concentrated (for example) even if noise is high. On that basis it would be more precautionary to also consider vessel noise in the context of potential for injury.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.
FC 133	"Although it is unlikely that the area under the influence of vessel noise around the Development site supports resident populations of cetaceans" We simply cannot determine if this is correct based on the paucity of targeted cetacean surveys in the NFB (and total lack of surveys that might determine residency, such as satellite tracking or photo-identification at the Sea Lion field). In terms of likelihood, objectively one could expect beaked whale or sperm whales in particular to be resident to that region of slope, based on what we know of them elsewhere. But it is unknown and this statement is unsubstantiated. A	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.

Reference	Representation	Navitas response
	precautionary approach would assume that resident populations might be present, and work to assess that risk.	
FC 134	"In terms of species sensitivity, the low-frequency cetaceans, such as fin and sei whales (both in the LF (7 – 3,500 Hz) hearing group), are considered the most sensitive receptors." SRWs should be added here, for reasons already explained.	Noted, this will be added. Please note the noise chapters are being revised and updated, see FIFD 54.
FC 135	"However, if the source was located in an area that was regarded as an important feeding or breeding ground (not believed to be the case here) the impact would be more significant" There is no data to determine that this is not the case. Or that it is the case! The data needed to support this statement simply don't exist. But what data do exist suggest is that this topic needs more attention – for example, the presence of sei whale song at the Sea Lion field in the Hipsey et al. (2013) report (see Cerchio and Weir, 2022) indicate that the region may be more sensitive than is being portrayed here. This is just one example, but the true importance of that area for marine mammals has not been properly investigated – another reason why baseline targeted marine mammal surveys at the site should have been undertaken.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.
FC 136	A major omission here is the total lack of measured hearing range data for baleen whale species. Yet it is not mentioned? In contrast, Southall et al. (2019) repeatedly mention this, along with many other caveats in the extrapolations of TTS and PTS thresholds to LF species. These inherent uncertainties need to be highlighted. "With regard to the uncertainty over marine mammal distribution, previous observational and acoustic surveys give a reasonable indication of the species present but further surveys would help to determine the inter-annual variation in marine mammal abundance in the area and help to resolve the status of rare species" Actually, with regard to understanding the impacts of noise on cetaceans, one of the key relevant data gaps is the residency/site fidelity of cetacean individuals/populations in the NFB, and thus their exposure time? Potentially the acoustic data could inform on that for sperm whales (for the population as a whole). But otherwise, that kind of data requires telemetry or photo-identification datasets rather than SMMOs or other	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54. Also see section 15.6.2.1.1: noise monitoring will be undertaken at the field of day-to-day operational noise and during various vessel scenarios.

Reference	Representation	Navitas response
	visual approaches. Same comment in Section 10.4.10.1. A programme of real-time calibrated sound measurements during drilling/production/decommissioning etc would help to validate the modelling results of this EIS.	
FC 137	The introduction focuses on the anchored LTVs but there will be additional vessel traffic introduced to the Berkeley Sound and Port William areas in relation to the offshore operations which should be considered too such as launches.	There will be minimal vessels attending the LTVs once they are moored in Berkeley Sound but text will be added to describe this.
FC 138	As indicated earlier in these comments, the information provided for sei whales and southern right whales in Berkeley Sound in 7.4.6.3 is outdated, non-inclusive and does not take into account the wealth of information that has been collected during 8 years of targeted whale research. In particular, it fails to recognise that: o Endangered sei whales use Berkeley Sound as a foraging ground, with individuals remaining for several weeks continuously and returning in different years; o Southern right whale aggregations utilise Berkeley Sound for breeding and socialising between mid-May and early September; o Berkeley Sound is the only location in the world where sei whale singing (indicative of reproductive activity) has been documented to occur (Cerchio and Weir, 2022); o There is already evidence for acoustic disturbance of SRWs from vessel noise inside Berkeley Sound (Cerchio et al. 2022 in Weir, 2022); o Berkeley Sound is included as a KBA for sei whales and as IMMAs for sei whales and southern right whales. • The available data need to be thoroughly represented in Section 7.4.6.3 if that section is then going to be referred to here as the basis for understanding the 'receptors' for noise assessment.	Noted, Section 7.4.6.3 will be updated accordingly.
FC 139	Cerchio et al. (2022, in Weir, 2022) provide some actual measurements of vessel noise inside Berkeley Sound and in relation to some specific vessel types (although it wasn't known how far away the vessels were from the hydrophone at the time). This information is relevant to include	Noted. This will be amended. Please note the noise chapters are being revised and updated, see FIFD 54.

Reference	Representation	Navitas response
	here. They also show a decrease in SRW calls in relation to the increase in noise, which is certainly relevant to the EIS because SRWs use Berkeley Sound to breed requiring that their contact calls (upsweeps) and song (gunshots) can be heard. "Greatest sound levels occur at low frequencies typically between 10 – 300 Hz with broadband sounds predominantly below 150 Hz and in some cases below 40 Hz (Ross, 1993; McKenna et al., 2012)" Its widely documented that vessel noise swamps all of the low frequencies that baleen whales use (primarily <1000 Hz) and is loud across that range. An example of this over the 0–1000 Hz range can clearly be seen in the spectrograms in Cerchio et al. (2002).	
FC 140	Interesting. Cerchio et al. (2022, in Weir, 2022) recorded actual received sound levels at a hydrophone inside Berkeley Sound peak of 130 dB RMS re: 1µPa in relation to either a reefer or a tanker and without knowing how far away from the hydrophone the vessel was. This, and lower, were sufficient to apparently impact on SRW vocal behaviour within the Sound.	Thank you for this information. Please note the noise chapters are being revised and updated, see FIFD 54.
FC 141	These figures don't seem to represent the actual anchoring locations shown in Figure 5-5. It would be more useful to show the sound levels around the LTS at the actual mooring locations proposed rather than in the middle of the Sound? Does the 120 dB zone then extend to the south coast? This is relevant to understanding impacts on SRWs in particular, which often travel along the coasts quite close to shore. "As can be seen from Scenario 3 below, these noise levels are within those already experienced in Berkeley Sound." While that may be true, Figure 11-6 shows quite clearly that large portions of inner Berkeley Sound are already heavily used by anchored vessels which cumulatively probably produce noise levels that exceed the disturbance threshold (appreciating that a high-use year was shown in the Figure, but a similar pattern will be evident in other years too). The LTVs will be anchored further east, thus extending this noisy area across even more of Berkeley Sound and introducing noise into a currently less noisy area. As can be	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.

Reference	Representation	Navitas response
	seen from the acoustic results in Cerchio et al. (2022, in Weir 2022), sei whale vocal behaviour is highest at the mouth of Berkeley Sound, medium in the central area and lowest in the innermost Berkeley Sound. This perhaps represents responses to vessel anchoring or differences in how the lobster krill are distributed, but either way then adding LTVs to that part of Berkeley Sound is not an impact that should be considered alone but rather cumulatively with all the other noise. Especially as this section clearly indicates that noise levels sufficient to exceed the disturbance threshold extend in a 0.5 km radius around the anchorage. There will be two LTVs, leading to a 2 km area of noise that exceeds the stated disturbance threshold in addition to all the existing noise from other vessels further west. Since foraging and breeding are key life cycle activities for the two LF-sensitive whale species then these noise levels have the potential to impact their behaviour inside Berkeley Sound in tandem with the noise already there, and this should be fully acknowledged.	
FC 142	"An example, based on the worst-case scenario (Scenario 1), of received SEL(cum) for marine mammals and fish moving away from the sound source at 1 m/s over a 14 hour period is presented in Figure 10-22" A more realistic 'worst case' scenario modelling exercise might be a sei whale that remains inside Berkeley Sound for several weeks continuously and doesn't move away at all, as has been shown by satellite tracking data (links to tracking data are in Annex 1). It would be desirable to see this modelled and presented in the EIS for transparency. Another very plausible worst-case scenario that should be investigated would be that whales are already feeding west of the mooring area when the LTV arrives, and so they cannot move out to sea for 14 hr in response to the sound levels but rather, given the semi-enclosed nature of Berkeley Sound, would actually have to travel towards it first (increasing their exposure) before they can get past and move away. The fact that whale calls from the same animals were heard simultaneously on FC hydrophones (placed 7 km apart) indicates that LF noise within Berkeley Sound does carry over considerable distance despite the properties of inshore coastal environments. This scenario should also be modelled	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.

Reference	Representation	Navitas response
	with regard to SEL(cum), as it is something highly likely to happen in practice.	
FC 143	The legend says a 14-hr period but the x-axis only goes to 1000 m. Over 14 hr a sei whale could be 50 km away. This figure legend needs a bit of clarification as it appears to relate to distance rather than time.	Noted this will be reviewed and amended.
FC 144	See comment above. These are not the realistic worst-case scenarios for whales, and this section should be revised accordingly.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.
FC 145	Same comment here as provided above to Figures 10-19 and 10-20 (P690-691). The concern is the cumulative impact and the location of the LTVs in a more sensitive part of Berkeley Sound for sei whales. Presumably Table 10.34 is for one LTV (the figure legend should be amended. to make this clear). It would be relevant to have data added to this Table to show the realistic scenario of two LTVs at the same time – what is the cumulative area disturbance impact.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.
FC 146	"This is similar in extent to the current level of disturbance, (estimated to be 594 m for a mid-size tanker), caused by existing shipping in the area" It's actually 65% higher.	Noted, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. See FIFD 54.
FC 147	"Importantly however, noise from transiting vessels will be intermittent and very short duration (Section 10.5.2) and once the vessels have stopped, noise levels will reduce to background levels such that any additional disturbance impacts will quickly return to existing background levels." Here, and throughout this Section of the EIS, the noise introduced into Berkeley Sound by the LTVs has been repeatedly justified using the fact that other vessels in Berkeley Sound are also noisy. There is little acknowledgement that this is two more noisy vessels in an area of Berkeley Sound that other vessels haven't been using much (but whales do). Stating that the LTV noise levels are similar to other vessels misses the point that the introduction of the one or two LTVs is cumulative – its additional noise, it lasts continuously for	When at anchor and not offloading their cargo, the LTVs will maintain one generator to keep the ship's facilities running but otherwise they will be on the anchor, weather vaning, minimising the noise they produce. When offloading they will be fully powered to enable safe operations etc. This will be acknowledged in the revised underwater noise section. Please also see FIFD 54.

Reference	Representation	Navitas response
	consecutive months, and it extends the existing area of noise in Berkeley Sound over an increased area. There isn't a lot that can be done to mitigate that, but not to fully acknowledge it when Berkeley Sound is a high-use habitat for two acoustically sensitive whales that have both been regularly recorded singing and calling in the area seems inappropriate. And also the fact that the LTVs will (presumably) also be present in months that have historically been quieter with regard to vessels within Berkeley Sound such as the winter months when SRWs sing and call within the Sound as part of their mating behaviour. The final sentence in 10.5.9. is the only real acknowledgement of the bigger picture in this whole section, but is not expanded upon regarding the IMMA/KBA/acoustic data/behaviour for the two whale species that emphasise the importance of Berkeley Sound as habitat for them.	
FC 148	"The status of the potential receptors in Berkeley Sound is relatively well understood, although the influx of southern right whales in the winter of 2017 (Section 7.4.6.3.1.1) highlights that unusual years do occur and long-term trends can change" As per earlier comments, the importance of Berkeley Sound for whales has not been fully represented by Section 7. The influx of SRWs in 2017 was not unusual – it only appeared so in 2017, but has since been shown to be a predictable and repeated annual occurrence that is very well-documented by both FC research and the local community. "The inter-annual distribution and abundance of marine mammals are acknowledged as a data gap" This neglects seven seasons of whale work inside Berkeley Sound (every year since 2017 except 2018) which has also routinely recorded dolphins – the inter-annual distribution of cetaceans inside Berkeley Sound is better known than anywhere else in the Falklands and is very well-documented. That information wasn't represented in Section 7.	Noted, will amend text and update references accordingly.
FC 149	"Navitas will deploy hydrophones in the Sound to record marine mammal vocalisations for 1-2 years to establish the baseline." FC has already collected three years of acoustic data inside Berkeley Sound and published initial results (Cerchio et al. 2022, in Weir 2022; Cerchio and Weir 2022). The baseline is well documented but not represented in the	Regarding the analysis of only 5% of one years acoustic data, please refer to FC 129. The EMMP workshop determined that effects of underwater noise on marine mammals inshore 'were considered by the [EMMP] workshop to

Reference	Representation	Navitas response
	EIS. Additionally, only 5% of the one year of acoustic data collected as a baseline at Sea Lion (Hipsey et al., 2013) has been analysed and actually used to inform this EIS. This doesn't provide high confidence in an additional Berkeley Sound dataset being used to its full potential. "Marine Mammal Observers (MMOs) will be placed on the OCVs … a review of the MMO reports will be conducted after five years and used to improve knowledge of locations and behaviour of marine mammals." The data from MMOs on OCVs occasionally visiting Berkeley Sound will be used, but the 7 years of targeted research (including satellite-tracking, acoustics, photo-ID etc) inside Berkeley Sound is largely omitted from Section 7. "Two projects studying the inshore cetaceans of the Falklands, with a focus on Berkeley Sound, have recently concluded (Weir, 2020 and 2021)." The extensive work published in Weir (2022) would be the most relevant and substantial information on whales in Berkeley Sound available to date but has been omitted from this EIS.	be now outside the scope of the EMMP' due to the elimination of inshore ship-to ship crude oil transfers from the development plan. Nonetheless, Chapter 10.5 is being revised (Please see also FIFD 54) and SMMOs will be deployed on vessels for three years pre-first oil. The suggested papers will be included in Section 7.4.6.
FC 150	In 'Impacts on wildlife' pinnipeds are given as the only marine mammal example. It should be added that cetaceans are also vulnerable to entanglement in, and ingestion of, waste materials, including the whole range of species from small porpoises/dolphins to large baleen whales. From Weir and Prieto (In Press, available on request) – "From 2013 to 2020, three instances of live entangled sei whales were reported off the eastern USA seaboard, including one animal with plastic strapping around its rostrum … In cases where entanglements limit the mouth opening to feed, or are sufficiently severe to limit mobility, they are highly likely to cause mortality. Sei whale feeding methods are non-selective, and lunge-feeding in particular can result in the accidental ingestion of non-target items including plastics and other debris. Additionally, microplastics may occur within sei whale prey species, particularly when they are feeding coastally on shoaling fish (e.g. Scombridae, Clupeidae and Engraulidae) which have high potential for ingesting microplastics via their own prey (Burkhardt-Holm and	Noted. This will be amended.

Reference	Representation	Navitas response
	N'Guyen 2019). Plastic ingestion may be an increasing threat, with plastic debris being recently identified in a sei whale faecal sample in Chile (Buchan et al. 2021). Stranded sei whales have been found with plastic in their stomachs in the UK (Baulch and Perry 2014) and in the USA (Henry et al. 2020), with the ingestion directly contributing to mortality in the latter case. Additionally, microplastics are readily trapped within baleen plates and where they are a fouling risk that prevents whales feeding efficiently (Werth et al. 2019).” While this text refers specifically to sei whales, literature searches will reveal extensive documentation of cetaceans with plastic ingestion – offshore species including beaked whales and sperm whales also appear particularly prone to this.	
FC 151	“Most publication however focus in the larger whales. Schoeman et al., (2020) found that smaller animals are also affected and recommend the establishment of a species-specific necropsy protocol and a database for smaller species as well as the larger animals.” This isn’t correct there is a lot of information on smaller cetaceans too (a literature search reveals many papers). A key reference that should be included here would be Van Waerebeek et al. (2007) who completed a review of vessel collisions on small cetaceans worldwide, as well on baleen whales in the Southern Hemisphere. “Few vessels will visit other inshore waters e.g. Berkeley Sound” This is likely over-simplistic because no doubt there will at least be tankers, and likely regular launches attending the LTVs from Stanley for a variety of reasons (supplies, customs, maintenance, crew changes, medical visits etc) as do the other vessels in Berkeley Sound. For example, project use of launches hasn’t been mentioned in this EIS.	Noted, this reference will be added. Vessel visits to the LTVs while they are in Berkeley Sound will be minimal. The LTVs will likely require one crew change, one bunkering top up and one resupply each during their time in Berkeley Sound meaning a couple of PSV trips for each LTV during their stay.
FC 152	While there isn’t legislation, there are guidelines. A Code of Conduct for Cetaceans has existed in the Falkland Islands since 2020 and has been adopted by FIG. This should be included in the EIS.	Noted. This will be amended.
FC 153	“The receptors that may be subject to the risk of collision during the Phase 1 & 2 Development include a wide range of large cetacean species that are known to occur within Falkland Islands waters (Section 7.4.6).	Noted, an assessment of vessel collisions with small marine mammals will be included in section 10.11.

Reference	Representation	Navitas response
	Small cetaceans (dolphins) are fast moving and agile enough to avoid vessels travelling at moderate speed and are likely to be at greater risk from small fast-moving craft rather than those associated with the Development…For these reasons, small cetaceans are not considered further in this assessment, which explores only the risk of collisions between Phase 1 & 2 vessels and large cetaceans (whales).” We strongly disagree with these sentiments. There is a large amount of published information worldwide showing small cetaceans being injured and/or killed by vessels, including very large vessels such as ferries. We would be happy to provide a list of applicable information on request. Small cetaceans are not agile enough to avoid vessels moving at moderate speed – this is a very misleading statement, and fails to account for the fact that calves or compromised animals may not be as responsive, or that much depends on the behaviour/responsiveness of individual animals and on what the platform is doing – erratic changes in direction or speed are especially an issue, given that dolphins in the Falklands are interested in propellers and often in close proximity to them. Indeed, as an example, a Commerson’s dolphin was struck and killed by a launch coming alongside at FIPASS (see below), and we are also aware of an incident with Concordia Bay. Porpoises, dolphins and whales should all be included in a Vessel Collision assessment for the Falklands, especially since all of the offshore vessels will be coming into Stanley/Port William for crew changes and supplies and so it’s not only offshore waters that need to be considered. Vessel strike was in fact identified in the draft cetacean Species Action Plan (SAP) by SAERI/DOKE as a likely threat to Commerson’s dolphins. “Indeed, some species, such as Peale’s dolphin (Lagenorhynchus australis), are attracted to large vessels to bow-ride. For these reasons, small cetaceans are not considered further.” Most experts agree that this behaviour increases their risk, not eliminates it. See Van Waerebeek et al. (2007).	
FC 154	There is no “current Falkland Islands Species Action Plan for Cetaceans (FIG, 2008c)” - it expired in 2018.	Noted. Reference to the Falkland Islands Species Action Plan for Cetaceans (FIG, 2008c) will be removed.

Reference	Representation	Navitas response
	"…identifies a number of potential threats to cetaceans but does not regard ship-strike to be a problem in the Falklands." The 2008-2018 SAP expired and not including vessel strike was an oversight by those authors and does not reflect best available evidence. Any SAP proposed now would include vessel strike – see the draft SAP for all cetaceans by SAERI/DOKE, and the sei whale SAP that is currently in preparation by FC (to be completed before December 2024, but current draft available on request). "Indeed, there are no known records of collisions between vessels and cetaceans in the Falkland Islands." And similar on P864 and P867. This is incorrect and demonstrates a lack of familiarity with available information which includes: o A launch reporting a 'bang' as it made physical contact with a sei whale in 2017 in Berkeley Sound (Weir, 2017; draft cetacean SAP, SAERI); o A near-miss between Concordia Bay and a sei whale in Falkland Sound in 2017 (Weir, 2017; draft cetacean SAP, SAERI); o A 'bang' on the hull of Golden Fleece from an interaction with a sei whale on the west coast of the Falklands in 2018 (Weir, 2018; draft cetacean SAP, SAERI); o A Commerson's dolphin killed by a launch manoeuvring at FIPASS in the mid-1990s (S. Cartwright, pers.comm.; draft cetacean SAP, SAERI); o An anecdotal account of a Commerson's dolphin being fatally injured by Concordia Bay while manoeuvring at the jetty at Port Howard; o An anecdotal account of a launch hitting a right whale on the south coast of Berkeley Sound (no damage to the launch, no certainty on injury to the whale); and o Propeller wounds on the bodies of southern right whales photographed in the Falklands (available from FC), which could have occurred anywhere in the SW Atlantic but clearly demonstrate risk. In most of these cases, vessels were actually going slow <10 knots or manoeuvring at the time of the incident. Regardless of the above evidence, it is clear from the published literature that all of the cetacean	Navitas would be grateful for sight of the FC draft of the SAP and will include these records in this section.

Reference	Representation	Navitas response
	species occurring in coastal waters around the FI (and many of the offshore ones) have documented injuries or mortalities from vessel strikes (see Van Waerebeek et al., 2007), and that local cetacean experts (Costa, Weir) that have worked in the FI understand the risk to be real for all species not just whales.	
FC 155	"Therefore, when assessing the impact and the likelihood of cetacean collisions it is important to consider…The known behaviour of different species which can make individuals of a particular species more likely to be involved in a collision". This has not happened in the EIS. There is little recognition that: (1) both coastal dolphin species are attracted to propellers and mill around boats while they are manoeuvring alongside at jetties; (2) sei whales are feeding in the Falklands during which they can become oblivious to boats; and (3) SRWs engaged in socialising and mating are largely oblivious to boats, and Eubalaena whales are anyway particularly vulnerable to vessel strike due to their buoyancy.	Noted, an assessment of vessel collisions with small marine mammals will be included in section 10.11.
FC 156	"The size of the southern right whale population that breeds off the Argentine coast is well studied and tripled since 1999 to 2006." The most relevant information is related to the Falklands to assess collision risk. Again, there is a failure to cite appropriate sources here (e.g. Weir and Stanworth, 2019). Once more, the misleading statement about the 2017 'influx' appears. The list is ambiguous. SRWs do not "tend toward a coastal distribution" – they occur in 5000 m water depth offshore in the Argentine Basin and all over the SW Atlantic (see many satellite telemetry papers). Their coastal occurrence is linked with wintering grounds, for the remainder of the year they are pelagic. A better representation of SRW vulnerability to collision would be: o Are particularly buoyant and slow moving, so can be slower to react to approaching vessels than many other whales; o Aggregate in nearshore waters around the Falklands coast during winter (but occur offshore year-round), where high densities overlap with vessel traffic (especially Berkeley Sound and Port William); o When engaged in some behaviours (especially mating and socialising winter aggregations) can become oblivious to boats;	Noted. This will be amended.

Reference	Representation	Navitas response
	Spend prolonged periods at, or near, the surface when engaged in social/breeding behaviour, or when resting between foraging dives.	
FC 157	"While the results of photo-identification are emerging (Weir, 2022) there is not sufficient survey data to determine an accurate population estimate, although there is anecdotal evidence that the number within Falklands' waters, and more generally within the south-west Atlantic, is increasing (Iñíguez et al., 2010)." There is an abundance estimate published for sei whales in one part of the Falklands (Weir et al., 2020), and also minimum population sizes (from photo-ID) provided for Berkeley Sound and other areas in published reports (Weir, 2017, 2018, 2022). These have been assessed in a global context (Weir, 2021) to support the fact that FI waters support a globally significant sei whale population. In lieu of all the targeted whale work carried out on sei whales in the Islands, a paper (Iñíguez et al) has been cited that refers to only 3 sightings in the FI between 2004 and 2008 as evidence that the species is increasing here. • "With regard to their behaviour, while there are records from around the world of collisions between sei whales and vessels (IWC database, 2014) they are considered to be at lower risk than most other large whale species (Vanderlaan and Taggart, 2007). This is primarily because they: Appear to respond to approaching vessels, Are relatively fast swimmers, and Tend to swim just below the surface leaving a clear trail of 'fluke prints' in their wake (Sea Watch Foundation, 2012). It should be noted that elsewhere in the world sei whales are considered to be an offshore species; however, in the Falklands this species is associated with relatively shallow inshore waters." We strongly disagree with most of these statements, which are outdated and relate to sei whales in other regions rather than in the Falklands. It should be realised that the work in the Falklands (and a couple of other geographic locations) is some of the first extensive field research carried out on sei whales anywhere globally, and lots of these misconceptions will be rectified in the coming years. Reviews of sei whale collisions can be found in Prieto and Weir (2022) and Weir and Prieto (In Press, available on request). The fact that there are documented vessel strikes both globally and in the FI means that they	Noted. This will be amended.

Reference	Representation	Navitas response
	don't always respond to vessels. While they can be fast swimmers, they can also be very slow. See Segre et al. (2021) for examples of slow skim-feeding in the FI. It is not clear what relevance the 'fluke prints' have, but they often appear at the surface 100s of metres away from where the animal actually is. There is little point in comparing sei whale behaviour in the North Atlantic and North Pacific (where many of these perceptions come from) with that in the FI, because sei whales in those areas generally use pelagic offshore habitats. Whereas sei whales in the FI also intensively use nearshore areas, where overlap with human activities is far higher. A better representation of sei whale vulnerability to collision would be: o Occur in high densities in nearshore waters during summer and autumn, including in Berkeley Sound; o Use nearshore waters as a foraging habitat, where their focus on feeding may make them less responsive to vessels; o Are especially vulnerable when surface skim- and lunge-feeding (Segre et al., 2021) when they spend prolonged periods moving slowly near the surface; o Often behave unpredictably, making them difficult to spot and avoid by vessel crews.	
FC 158	"While there are limited data regarding cetacean distributions around the Falkland Islands, there is some very detailed information regarding shipping movements, although this has only been recorded since June 2014." Limited information offshore, but there is now a wealth of information in the nearshore waters…including in the shipping routes. See published literature.	Noted. This will be amended.
FC 159	"With regard to the overlap in vessel activity and cetacean distribution, the distribution of right and sei whales in particular is not well understood (Section 10.11.4.3). However, the fact that both are sighted within the NFB, Berkeley Sound and near Stanley Harbour year-round suggests that these species have spatial and temporal patterns of distribution, which overlap with shipping activity." Those are two species for which the distributions (at least coastally, but also some offshore data from telemetry) are actually particularly well understood.	Noted. This will be amended.

Reference	Representation	Navitas response
	Their overlap with shipping is a fact, not a suggestion. See published literature.	
FC 160	This again overlooks support/supply vessels such as launches used during this project for moving supplies etc between Stanley Harbour and the LTVs.	Vessel visits to the LTVs while they are in Berkeley Sound will be minimal. The LTVs will likely require one crew change, one bunkering top up and one resupply each during their time in Berkeley Sound meaning a couple of PSV trips for each LTV during their stay.
FC 161	The existence of Falkland Islands-specific guidelines (adopted by FIG) since 2020 has been omitted here.	Noted, this will be added.
FC 162	"As part of Navitas' operating procedures, speed restrictions will be applied to vessels entering the boundary of the inshore proposed Marine Managed Area (pMMA); as vessels approach the inshore pMMA boundary line the maximum speed permitted will be ≤10 knots. Additionally, vessels generally will only transit the Sound during daylight hours, with daylight-only berthing and night-time departure by exception only." 10 knots is fine to reduce collision risk, but the EIS also refers to 8 knots in places e.g. P865. For clarity please can you confirm – is it ≤10 knots at the pMMA line but then further reduced to ≤8 knots in Berkeley Sound (defined as west of the Vol Pt-Mengeary Pt line). Ideally, it would be desirable to maintain speeds of ≤10 knots in Port William too between (at least) 1 June to the end of August in order to reduce the likelihood of injurious SRW strike (sei whales are uncommon inside Port William) – perhaps this is already covered in the areas above?	That is correct, vessels will reduce speed to 10 knots at the pMMA boundary, and then down to 8 knots in Berkeley Sound (west of the Volunteer point - Mengeary Pt line). Navitas will amend the text in the EIS to clarify that vessel speeds will also reduce to ≤10 knots within Port William.
FC 163	"With regard to the sensitivity of each receptor, southern right whales are considered to be susceptible due to their behaviour (Section 10.11.4.3.1)." Both species are susceptible due to their behaviour – surface feeding sei whales are just as susceptible as SRWs. •"This species is listed as 'Least Concern' by IUCN." Yes but the SW Atlantic population is of regional conservation concern (see earlier comments re. IWC-CMP). •"However, vessel speed will decrease and watch-keeper vigilance will be heightened as vessels approach land in response to the increased risks of navigating in coastal waters, which increases the likelihood of detecting and avoiding cetaceans" Even the most vigilant of watch-keepers cannot see at night. It should be noted that inshore SRW	Noted. This will be amended.

Reference	Representation	Navitas response
	aggregations form in winter when daylight hours are the least and it will be too dark to detect whales visually for 16 hrs in each day. The reduction in vessel speed is the main thing. •This section omits any consideration of sperm whales. Sperm whales are regular in offshore waters of the FI, are an IUCN Vulnerable species, and are another species whose behaviour (long periods of logging at the surface between deep foraging dives) makes them particularly vulnerable to ship strike. See for example https://journal.iwc.int/index.php/jcrm/article/view/446	
FC 164	"In addition to the lookouts posted on the forecastle of the vessels as already referred to in Section 10.11.5" There is no mention of this in Section 10.11.5? Was it deleted? Is it still happening?	Lookouts are noted in 10.11.7, this will be re-worded and refer to the correct section.
FC 165	It is not clear on what basis 'unlikely' has been determined for collisions in offshore waters. The data on offshore cetaceans don't exist to support that. And there has been no consideration of sperm whales, which were the most common species acoustically detected at the Sea Lion field suggesting they are relatively common there (acoustic findings in Hipsey et al. 2013) and are also vulnerable to ship strike due to their behaviour? This should be amended. to 'Possible.' "The introduction of a 10 knot speed limit for the Falklands pMMA, in line with NOAA guidelines, is already considered as industry standard mitigation (Section 10.11.5)" Section 10.11.5 actually said that there wasn't any industry-standard mitigation?	Section 10.11.5 (Industry standard mitigation). states: 'As part of Navitas' operating procedures, speed restrictions will be applied to vessels entering the boundary of the inshore proposed Marine Managed Area (pMMA); as vessels approach the inshore pMMA boundary line the maximum speed permitted will be ≤10 knots.'. The initial impact assessment listed the likelihood of collision inshore as 'Possible'. However, Section 10.11.7 (Project-specific mitigation) states: 'To further reduce the risk of collisions in inshore waters, Navitas will limit vessel speeds to under 8 knots within Berkeley Sound.' In line with this the likelihood of occurrence is reduced to 'Unlikely'. Further, 'Unlikely' has been applied as while whale strikes have occurred previously in the industry , there were none during previous exploration campaigns in the Falkland Islands in the same area. A number of controls would have to fail for this to occur (i.e. no watch keeping, not following speed restrictions etc). Please refer to 10.11.6.1. Therefore, Navitas stand by the assessment. This section will be revised to include sperm whales.
FC 166	"Additionally, during transit in Berkeley Sound, there will be two qualified Seabird and Marine Mammal Observers (SMMOs), most likely posted to the OSVs and they will advise the Ship's Master on the bridge	It is agreed that the speed reductions are the most effective mitigation here. Thank you, Navitas would appreciate the information poster for distribution on project vessels. The Falkland Islands Code of Conduct will

Reference	Representation	Navitas response
	of the need for evasive action. The OSVs are the most common vessels transiting Berkeley Sound to pick up equipment from the LTVs." Again, this doesn't take into account other vessels like launches that might be running to/from the LTVs, and it doesn't help at night. As stated above, vulnerable inshore aggregations of SRW occur in winter when night comprises two-thirds of a 24 hr period and MMOs will only be effective for the other third. These extra efforts are appreciated, but the reductions in vessel speed are the single most effective method especially in winter. • "Mariners should be made aware of the issue and how it relates to the Falkland Islands, educational materials, such as posters, will be produced to be displayed on the bridge of contracted vessels (see IFAW (2013) see Figure 10-50 below for example)" FC has already produced a poster (in Spanish and English) in liaison with Fortuna that outlines the Code of Conduct for FI waters and is available for use for awareness etc. Please contact us if you would like a PDF or to modify that to suit. • "On all vessels a lookout should be posted while transiting areas of high cetacean abundance" This is rather ambiguous. How are areas of high cetacean abundance going to be determined in real-time, and who is going to be the lookout? And of course this is no use at night. • "If whales are spotted, speed should be reduced and animals given a wide berth." FI guidance should be followed to specify these distances. See the FI Code of Conduct. • "In addition to Navitas incident reporting and investigation, any incidents of collisions with marine mammals will be reported to FIG and the IWC" It would be nice if FC could be included in this loop, as the main organisation working with whales in the FI and producing Code of Conduct guidance. Near-misses (i.e. where whales pass <50 m from a ship, or where ships make diversions to avoid them) should also be logged/reported, in order to better understand risk. Same comment for P868. Additionally, FC may be able to attend dead whales floating at sea in the Berkeley Sound area (or subsequently washed up) and properly assess the nature of the injury, which could be useful to inform future risk assessments for industry.	be followed and added to this section. In terms of reporting, this will be discussed and agreed with FIG.

Reference	Representation	Navitas response
FC 167	"SMMOs coupled with the reduction to 8 knots within Berkeley Sound will reduce the likelihood of collisions between cetaceans and vessels from 'Possible' to 'Unlikely'." Most of the collisions evidenced in the inshore FI to date have been at low speed or while vessels are manoeuvring (see previous list). So the likelihood of contact is probably slightly decreased by reducing speed, but the chances of that contact then resulting in serious injury/death is what is significantly reduced. As such, this should probably remain 'Possible' (it makes no real difference to the assessment outcome anyway). As mentioned before, SMMOs might be reasonably useful in summer when daylight is long, but in winter their effectiveness is greatly limited by darkness.	Noted, no amendments proposed.
FC 168	"Sei and right whales are a common sight throughout the inshore waters of the Falklands during the summer and autumn but a complete survey is yet to be undertaken." Again, omission of eight years of data in inshore waters, including Berkeley Sound. Inshore SRWs are in winter, not summer. And again, what about sperm whales in the Sea Lion area, whose vessel collision assessment has not been mentioned.	Noted. The text will be amended. accordingly.
FC 169	Small cetaceans and vessel collision risk inside Stanley Harbour at FIPASS/TDF both need to be considered in this Table, since dolphin mortality from vessel strike has been documented within Stanley Harbour.	Noted, see FC 153 above.
FC 170	Since fur and feathers were tested here, it could have been possible to also include baleen plates testing here, as mentioned on P1057. See Werth et al. (2019) for experiments with oil on whale baleen.	The EMMP workshop (April 2019) noted that 'The risk to marine mammals may lie in those whales that feed on the surface using baleen, but no data exist to assess the risk, and experimental evidence might be unethical to collect.' Given difficulties in trying to import seal pelt to the oil testing laboratory in France, Navitas imagines it will be very difficult to preserve whale baleen plates and transport them to the laboratory for testing. Navitas will review the Werth et al paper and incorporate into the EIS, but notes that Sea Lion is far from a typical crude so experiments with Sea Lion crude might yield different results.
FC 171	The sei whale KBA is mentioned here, but the IMMAs are not.	Noted, the non-statutory KBA and IMMA will be added.
FC 172	"Each recovery unit would have a boom encounter width of 15 m and a single skimmer capable of recovering 30 tonnes per hour (if that much	Thank you for your comment. Appendix 2 of the preliminary OPEPS

Reference	Representation	Navitas response
	oil is encountered by the boom) and could operate at a wave height of up to 2 m" Perhaps some information should be added here to clarify what proportion of time at the Sea Lion Field over a year has wave heights less than 2 m where recovering spilt oil would be plausible. Is there a Plan B for when it isn't? Would the incoming recovery vessels from South America/Africa have capacity to operate in higher sea states?	identifies the oil spill response assets for each stage of the Sea Lion Development Phase 1 & 2. Oil spill response vessels can operate in high sea states, but they are reliant on the deployment of dedicated spill response equipment. As such the attendant vessels are not the limiting factor. According to the 'Metocean Criteria for the Sea Lion Development. Vol 2 ' (Premier Oil, 2015), wave height will exceed 2m c. 55% of the time. Therefore, mechanical recovery will often be challenging in South Atlantic sea states. However, as detailed both in the EIS and the Preliminary OPEPs, laboratory tests (by CEDRE) indicate that, given the nature of the Sea Lion crude, allowing for weathering and natural dispersion may often represent the optimal response approach and this will occur faster in the very metocean conditions which could prevent deployment of the response equipment. Recovery equipment will be available on station and would be deployed whenever conditions allowed. Please refer also to ED 190.
FC 173	"Although the assumed response has a very modest effect and recovers 6.3 % (2,231 tonnes) of the oil…" At only 6.3% recovered, 'low/poor' might be a more realistic description.	6.3% is at the upper bound of actual recovery rates experienced during a review of 30 large oil spill incidents - Etkin and Nedwed (2021), which concluded that 2-6 % mechanical recovery is experienced in practice.
FC 174	Endangered blue whales are forgotten again. • "…marine mammals are not considered significantly at risk due to the semi-solid nature of the waxy crude…" Not sure why this makes them not at risk, since lunge- or skim-feeding baleen whales could presumably ingest such matter due to their indiscriminate feeding techniques. • The areas mentioned in 'Coastal' are also part of a KBA, and two IMMAs for whales which is not acknowledged. In particular, this area is used heavily by SRWs during winter.	Navitas will update the text accordingly.
FC 175	The colour coding and overall risk assessment values used in these Tables is very confusing because it isn't clear why the final column has completely different verdicts to the descriptive text. Presumably this has been described somewhere in the preceding 1100+ pages, but it's not reasonable to have expected people to memorise it. The Table legends	Navitas is not entirely sure it understands the concern raised. There is no expectation for the reader to memorise any text, but the basic methodology is outlined clearly in Chapter 8. Table 12.9 shows the risk assessment of a subsea blowout. This is tabulated owing to the number of receptors considered. There are no conclusions on this in the preceding

Reference	Representation	Navitas response
	should make it clear why this is or refer the reader back to the relevant section with the explanation. As it stands, it is very difficult to comprehend	text. The table first indicates the impact (sensitivity of receptor x severity of effect) should it occur, which may be, for example, Moderate, and then factors in the likelihood of the blowout occurring which lowers the overall risk. The narrative preceding the table (Section 12.1.6.1.3) simply indicates the worst-case risk identified.
FC 176	How is it possible that terrestrial tourists possibly noticing a small amount of oil on the coast (described as being 'very unlikely to come to their attention') is deemed to be of 'Moderate risk significance', but marine mammals that live in the immediate area of a spill are deemed 'Very Low risk significance'. This allocation of relevant importance should be reconsidered.	This will be revisited and the sensitivity of the marine mammals revised upwards. The high sensitivity assigned to tourists is based on the perception of an oil spill, which may impact the tourism economy.
FC 177	"Cetaceans are more vulnerable to inhaling toxic vapour and are less affected by contact with the skin (Section 12.1.4.2.5)." The text in Section 12.1.4.2.5 does not support this statement – it merely describes both possibilities and does not assign relative importance. Recent papers from the Deepwater Horizon spill show that oil can adhere to cetacean skin, with unknown effects. Same comment as Table 12.11 re. how the overall risk significance can be deemed higher for land-based tourists than it is for Endangered marine mammals at the actual spill site.	Thank you for your comment. This is noted and the text will be clarified, the very different nature of the Sea Lion crude to that of the Deepwater Horizon means it is likely to have a different interaction with marine mammals, where ingestion is more likely.
FC 178	"There is no indication that the presence of a rig attracts associating marine mammals, although they could be attracted by potential prey species that may shelter near the rig." Incorrect, evidence is available online, for example: o Delefosse M, Rahbek ML, Roesen L, Clausen KT. Marine mammal sightings around oil and gas installations in the central North Sea. Journal of the Marine Biological Association of the United Kingdom. 2018;98(5):993-1001. doi:10.1017/S0025315417000406 ohttps://onlinelibrary.wiley.com/doi/full/10.1111/gcb.16134 ohttps://periodicos.ufsc.br/index.php/biotemas/article/view/2175-7925.2009v22n3p247	Text will be amended. to include indirect impacts.
FC 179	"While Oil Spill Response (OSR) equipment will be carried on the ERRV / MRSV and AHTS / ERRV offshore …in reality it is unlikely to be effective in the prevailing offshore weather conditions of the Sea Lion Field…oil spill response is not considered effective in respect of the	While prevailing metocean conditions are likely to limit opportunities for effective deployment, Navitas is committed to ensuring that appropriate oil spill equipment is available so that in the unlikely event of a spill every effort can be made to minimise its impact.

Reference	Representation	Navitas response
	largest events" Much of the discussion of OSR earlier can be negated by this statement that it would be ineffective.	
FC 180	Same comment about terrestrial tourists being categorised of higher residual risk significance than Endangered marine mammals that are present at the immediate site of the spill.	This will be revisited and the sensitivity of the marine mammals revised upwards. The high sensitivity assigned to tourists is based on the perception of an oil spill, which may impact the tourism economy.
FC 181	"The seasonal distribution of potential receptors in the NFB is reasonably well understood but further research is required to improve our knowledge of species distributions, and these are acknowledged as data gaps" We disagree, the seasonality of cetacean receptors at the NFB is not well understood.	Reasonable is a relative term and there are data from the field from at sea surveys and indeed PAM. A precautionary approach has been taken in the assessment where there are gaps.
FC 182	Apart from marine mammals being listed as a potential receptor in the list in 12.2.3, and the summary in Table 12.23, there seems to be no actual detailed consideration of the potential impacts of a marine diesel spill on marine mammals in Berkeley Sound. In Section 12.2.4.2 then it states that the majority of receptors have been considered in the offshore oil spill section (12.1), but this isn't adequate for marine mammals because the sensitivity in Berkeley Sound is significantly higher. The Sound is both a KBA and an IMMA based on its whale sensitivities, and foraging Endangered sei whales would be directly exposed and also indirectly exposed because oils accumulate within prey species (Werth et al. 2019). The modelled spill areas in Figs 12-45 and 12-46 overlap with whale foraging areas.	The sensitivity of the receptor (marine mammals) is rated 'High' as 'A species with IUCN Endangered of Vulnerable status has notable presence in the zone of influence of the project'.
FC 183	The fin whale hotspot fallacy in Berkeley Sound is repeated again here. However, southern right whales need to be added here as a KES in Berkeley Sound, as a species of regional conservation concern. • "Although it is possible that MGO from a spill of this size will not come into direct contact with any marine mammals, which occur in relatively low densities, this is not certain" This is incorrect. Berkeley Sound supports high densities of sei whales and SRWs. It would be surprising if a MGO spill inside Berkeley Sound did not come into direct contact with a marine mammal. • "Given the modest volatility of MGO, marine mammals could be susceptible to inhaling hydrocarbons upon surfacing to breath" In fact one of the most likely impacts would be accidental ingestion while sei	Section 7.4.6.3.1.6 (Fin whales) states that 'There are two apparent hotspots of fin whale sightings in inshore waters; one to the west of the Islands and the other in Berkeley Sound (Frans and Augé, 2016).' However the narrative goes on to state that Weir et al. (2017) refuted this as mistaken sightings. Southern right whales are also listed in Section 7.4.6.3.1.6. The sentence will be amended. to remove 'relatively low densities'. Section 12.1.4.2 details the nature of the impact to the key receptors of an oil spill. Section 12.2.4.2 describes the nature of the impact to additional inshore receptors. Section 12.1.4.2.5 (on marine mammals) will be

Reference	Representation	Navitas response
	whales are lunging or skimming to capture prey, both at the surface and subsurface. Same comment for Table 12.2.4 (P1166).	updated to include ingestion of oil during lunge feeding as an example (should references be available for this) and Section 12.2.3 will be updated to refer specifically to the common receptors described in 12.1. [A recent set of tests involving whale baleen and six petroleum-based oils (Werth et al., 2019) indicated that whale baleen is oleophobic and does not adsorb oil, and that oil is readily rinsed from the baleen by flowing water. There was minimal wrinkling or peeling of the baleen's cortical keratin layers in the tests and filter porosity was not appreciably affected. Oil ingestion risks remain although particle capture studies suggest potentially greater danger to mysticetes (baleen whales) from plastic pollution than oil.] Werth Alexander J., Blakeney Shemar M. and Cothren Adrian I. 2019Oil adsorption does not structurally or functionally alter whale baleenR. Soc. Open Sci.6182194 http://doi.org/10.1098/rsos.182194
FC 184	"Should the monitoring of impacts indicate that the significance of the impacts and risks predicted in the EIS are not appropriate, and / or that mitigation is not effective, a revised mitigation measure and / or monitoring regime will be required." This may not be realistic. It is not clear how quickly monitoring would show impacts and how quickly after that would something change to address those impacts.	Regular review of the monitoring programme and results of the monitoring will be undertaken to see if any trends are emerging and the EMMP adapted accordingly.
FC 185	It is not clear how seabirds have ended up being rated as higher sensitivity to underwater noise than marine mammals. This doesn't make logical sense.	Seabirds are considered as having 'High' sensitivity. Initial impact to marine mammals assessed as 'Moderate' (sensitivity 'High' x severity 'Minor'). This demonstrates two ways in which the assessment leads to an EMMP action, either through high sensitivity coupled with uncertainty (in this instance seabirds) or through significant impact coupled with uncertainty (marine mammals), see section 15.3.1.
FC 186	"Marine mammal observations prior to and during operations at the Sea Lion location and on Transits" Is the 'prior to' going to involve some targeted marine mammal surveys before anything happens? The data gap	In accordance with the EMMP, SMMOs will be on board a number of the Sea Lion Offshore Assets. They will join the assets once they are on hire and in the area. The AHTS will commence their operations prior to the arrival of the MODU and SMMOs will be on board at this time.

Reference	Representation	Navitas response
	regarding offshore cetacean occurrence at the Sea Lion field is a quite considerable one, and the little data that does exist is old.	
FC 187	The information in this Table is rather vague and it isn't easy to understand what is being proposed. But some of these are over-ambitious and unlikely to actually be achievable in practice. For example, "Investigate - Any adverse noise-related behaviour of marine mammals". There should be a plan/idea as to how that will be assessed before the surveys start, so that data collection can be steered accordingly. Identifying cetacean behavioural changes and linking them to an activity is extremely difficult and even dedicated research studies with ample resources and personnel often don't manage to do it (see all of the conflicting literature on marine mammals and noise impacts). And it takes a lot of time (several years) because of the need for adequate sample sizes to prove cause-effect. The likelihood of a behavioural response being identified by two SMMOs who aren't located on the noise-generating platform is virtually negligible. Also, the stated management action of "Scale back noisy activity" isn't viable – as part of the environmental approach then the project should already have scaled back noisy activities to the lowest levels needed to achieve the project goals, as that is standard industry best practice (and the ALARP approach stated in this EIS). "Adjust timing of operations" is also likely to be unrealistic in practice because industrial operations are constrained by weather and availability of platforms (and associated costs). We don't have better suggestions for handling this, the fact that offshore marine mammals will be disturbed by noise is probably a given side-effect of the project. But we do think that the stated Management Thresholds and Actions won't be achievable in practice with the resources that are being applied. • This table relates to 10.4 Offshore underwater noise. Where is the table for Inshore underwater noise and consideration of impacts in the sei whale foraging ground in Berkeley Sound? Especially the cumulative impacts? Why isn't this in the EMMP?	Navitas believes that noise generating activities have been avoided or scaled back as far as is reasonably practicable. The summary EMMP tables were prepared in discussion with stakeholders in the April 2019 EMMP workshop. The published workshop report notes that 'once the FDP has been approved and sanctioned, the EMMP will be transferred into a live document which will provide detail on: - Specific roles and responsibilities - Timelines, deadlines and 'frequency of execution' for actions identified - Progress and completion throughout the life of the field.' The workshop report proposes that an advisory committee including individuals with relevant expertise in the subjects being monitored will help draw up the specifications in any scope of work...and would also be able to comment on the results of the monitoring.' The EMMP workshop determined that effects of underwater noise on marine mammals inshore 'were considered by the [EMMP] workshop to be now outside the scope of the EMMP' due to the elimination of inshore ship-to ship crude oil transfers from the development plan. Nonetheless Chapter 10.5 is being revised. Please see also FIFD 54.
FC 188	• "SMMOs on board vessels periodically covering all seasons with particular focus at the time of year when animals are concentrated in the	Navitas will amend the EIS text to ensure that it refers to the Cetacean Code of Conduct and Navitas' commitment to adhere to it for all cycles of

Reference	Representation	Navitas response
	area of ship movements." It is not clear what this means. There are few data available for the NFB to show when animals would be concentrated in the area of ship movements. • "Reaction - Reduce vessel speed near marine mammals not attracted to the vessel" This is not clear. Presumably, if they are attracted to the vessel then they would be at higher risk of collision not lower. It would be better to simply commit to following the existing FI Code of Conduct which makes these things much clearer – dolphins approaching the vessel do not result in a reduction of speed but it is requested that vessels maintain their heading (or amend it only slowly) while there are dolphins around the vessel so that the animals have time to respond and maintain distance from the propellers. Also, something needs to be added here regarding vessels coming alongside at FIPASS/TDF with regard to dolphins, because there will be Commerson's dolphins in that area likely to approach the vessels while they manoeuvre alongside and already a documented example of a dolphin being killed during one such manoeuvre. • "Adaptation - Add marine mammal detection systems (e.g. infra-red camera systems); adjust timing of operations; consider use of deterrents" This would need to be tested on higher whale densities in Berkeley Sound probably before accepted as viable offshore. Reliable mitigation for vessel collision is currently to reduce overall speed and avoid sudden changes in both heading and speed. A commitment for project vessels to follow the existing Code of Conduct would address a lot of this.	the Sea Lion Phase 1 and 2 Development. Navitas notes that it is already committed to vessel speeds in Berkeley Sound and Port William that are lower than those recommended by the Code of Conduct.
FIC 1	Sea Lion Environmental Impact Statement We have reviewed the above document and congratulate Navitas Petroleum on the breadth and depth of the analysis carried out, particularly as regards the potential impact of the project on Stanley and Berkeley Sound. While everyone would prefer that fossil fuels are eliminated sooner rather than later, it is generally accepted that they will continue to be required for the foreseeable future. Given this backdrop of demand, it is clearly better that oil continues to be supplied by responsible democracies, rather than leaving it to less desirable regimes around the	Thank you for your comments.

Reference	Representation	Navitas response
	globe. It is also notable that the Falkland Islands can help the UK maintain its energy security in a time when North Sea production is declining. The development of these oil reserves will also help to secure the financial future of the Falkland Islands by both directly and indirectly boosting the economy. Clearly, there are a number of further steps to go through as part of ensuring that the development is delivered responsibly, but we are encouraged by the thoroughness of the environmental impact statement and remain supportive of the process.	
FIFD 1	the following statement is unclear: << A mismatch in bathymetry and currents data can result in 'dead zones' near the seabed, which could adversely affect subsea discharges.>> Presumably, what was meant is that mismatch adversely affects the modelling of subsea discharges - ?	Thank you for the comment. The bathymetry in the area is well understood. The Sea Lion area was mapped using multibeam techniques as described in : Rockhopper Plc.,2012. Sea Lion Development Environmental Baseline Survey Scope of Work, 25-Jan-2012. Rockhopper Exploration Plc. Document Rev03 120125. Gardline. 2012. Sea Lion Field Development. North Falklands Licence Areas. PL032, PL033 and PL04. March and April 2012. Environmental Baseline Survey Report. Prepared for Rockhopper Exploration Plc. Reference: 9030.1. The FIFD 1 quote is taken out of context of the wider EIS narrative, the whole section states, "The bathymetry data supplied by BMT is precisely the same data that was used in the hydrodynamic modelling to produce the ocean currents dataset as discussed in section 7.3.3. This is important since it results in a perfect match between bathymetry and seabed currents data. [This is important to note because if there were] A mismatch in bathymetry and currents data can result in "dead zones" near the seabed, which could adversely affect subsea discharges."
FIFD 2	<<…most likely to interact with oil and gas activity in Berkeley Sound, is the giant kelp…>> Why?	As stated, in 7.4.2.2.1.1, this is because 'This species is one of the largest (growing up to 60 m in length) and most abundant of the brown algae found around the coast of the Falkland Islands (van Tussenbroek, 1989).'

Reference	Representation	Navitas response
FIFD 3	<<Tree Kelp … have an order of magnitude greater biomass than Giant Kelp (Macrocystis pyrifera). If confirmed, … (P. Brickle pers. comm.)>> So how well is the biomass known?	Lessonia spp. are likely to have a biomass that is an order of magnitude greater that Macrocystis. This is based on observation and also what is known about Macrocystis biomass. However the biomass of Lessonia remains unknown.
FIFD 4	<<[Green algae] are anecdotally highly diverse and will be subject to study on how refugia (like the Falkland Islands) in the last glacial maximum contributed to this diversity>> Will be subject to study by who? Study in relation to oil?	This is part of the baseline description and provides context. The work is part of a PhD studentship and also a collaboration with South American Institutions and BAS. A reference will be added to the post consultation EIS (Emma Beaton, 2019)
FIFD 5	In the second paragraph, this sentence seems to be incomplete: << This suggests that of those taxa with a 50 % or greater predicted probability of being present in the area, are likely to be low density (not in aggregations) and / or rare, given that they went undetected in the Gardline (2013a) survey. >>	This will be amended to: This suggests that of those taxa with a 50 % or greater predicted probability of being present in the area, these taxa are likely to be low density (not in aggregations) and / or rare, given that they went undetected in the Gardline (2013a) survey.
FIFD 6	<< This study will inform a marine invasives species monitoring program, as recommended at the EMMP workshop. >> Any information on the scope or timeline of the monitoring program?	See Section 15 EMMP for further details on monitoring.
FIFD 7	<< … parts [of NS] are heavily trawled throughout the year for finfish and skates. >> Skate trawling is no longer active.	Thank you for your comment. This is noted and agreed. Skates are no longer targeted but are caught as by-catch. The narrative will be amended for clarity.
FIFD 8	<< The abundance of southern rock cod has increased several-fold in recent years, and it is currently the most abundant finfish on the Falkland Islands shelf and has become one of the most important finfish fisheries in the Falkland Islands (FIG, 2013c). >> This is obsolete. Rock cod has decreased considerably since 2013, and it is no longer the most abundant groundfish or important catch.	Noted and agreed. Hake is the most abundant. Rock cod still remain important but are not reported as by catch accurately. The text will be amended for clarity.
FIFD 9	<< Although the JNCC Seabirds At Sea Team (SAST) surveys are 24 years old, it is unlikely that broad-scale animal distribution and movement patterns have changed significantly. >> It is important to stress that SAST seabird & marine mammal data was not only collected opportunistically, but were mostly recorded by a single observer (White et. al, 2002). In addition, throughout the years ecosystem changes have occurred, fish stocks have reduced, megafauna	Thank you for the comment. Navitas will collect data through SMMOs on vessels developing the field in the three years pre first oil and also collect acoustic data where / when practical too.

Reference	Representation	Navitas response
	populations have recovered, and interactions with offshore human activities have increased. Considering the Falkland Islands are a hotspot for seabirds and marine mammals, in order for FIG to apply best practice for planning, mitigating and monitoring impacts of the Sea Lion Field, the collection of new data is required. Surveys must be carried out independently and applying the best scientific methodology and technology available: standardised sampling for megafauna (transects and distance-sampling), include a team of eight observers to work on shifts, specialised equipment (big eyes, infrared cameras, multi-frequency acoustic array), and a PAM (passive acoustic monitoring) team.	
FIFD 10	<< In order to ensure that the JNCC SAST data provided an appropriate dataset on which to base the environmental impact assessment, POEPL commissioned Genesis to undertake a review of the data (Genesis, 2017). >> Considering the Falkland Islands are a hotspot for seabirds and marine mammals, FIG needs to apply best practice for planning, mitigating and monitoring impacts of the Sea Lion Field. In consequence, independent evaluations of the data and the EIA are a must.	FIG DMR has commissioned independent reviews of the EIA/S from the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) and the Scottish Association of Marine Science (SAMS) and may choose to comment further. See also FIFD 9.
FIFD 11	<< With permission from Falklands Conservation (FC) and JNCC, the SAST survey data was re-examined to highlight the species recorded in the vicinity of the Sea Lion area. >> Contradicts what is stated on page 4 (Acknowledgements).	Thank you for your comment. This is noted and the acknowledgments will be checked.
FIFD 12	inconsistent use of the common name <<southern sea lion>>, elsewhere it is <<South American sea lion>>.	Thank you for your comment. This is noted and the text will be checked for consistency.
FIFD 13	Black browed albatross: besides the local breeding population of black-browed albatross, the South Georgia population also occurs in the Falkland Islands (Frankish et al. 2020a). The black-bowed albatross from South Georgia is an ACAP Priority Population (>10% of the global total for each species and declining >3% per annum) (Phillips et al. 2023).	Thank you for your comment. This is noted and reference to other BBA populations will be added.

Reference	Representation	Navitas response
FIFD 14	White chinned-petrel: there is a recent tracking paper that links movements of the WCP South Georgia population to the FI (Frankish et al. 2020b).	Thank you for your comment. This is noted and Navitas will add the reference.
FIFD 15	Northern royal albatross: there are tracking papers that link movements of the NRA breeding sites in New Zealand to the FI (Nicholls et al. 2002, 2005; Bose et al 2023).	Thank you for your comment. This is noted and Navitas will add the reference.
FIFD 16	Grey-headed albatross: besides being IUCN-Endangered, since 2011 the grey-headed albatross from South Georgia is an ACAP Priority Population (Phillips et al. 2023). Tracking research links movements of the SG population to the FI (Clay et al. 2016)	Thank you for your comment. This is noted and Navitas will add the reference.
FIFD 17	Wandering albatross: besides being globally Vulnerable, the wandering albatross from South Georgia is locally Endangered (Jiménez et al. 2016). In addition, since 2011 the WA from SG is an ACAP Priority Population (Phillips et al. 2023). Fine-scale research links the SG population with FI waters (Carneiro et al 2022) and supports previous research in the FI (Otley et al. 2006).	Thank you for your comment. This is noted and Navitas will add the reference.
FIFD 18	Black-browed albatross can dive to 19 m (Guilford et al. 2022). And, the table does not include WCP from SG.	Thank you for your comment. This is noted and Navitas will amend the table.
FIFD 19	The last paragraph omits that SG populations of BBA, GHA and WA are ACAP Priority Populations.	Thank you for your comment. This is noted and Navitas will amend text and add SG populations.
FIFD 20	White-chinned petrel: should include the size of the colony in Kidney Island; omits the fact that most of the individuals seen in the FI are from SG.	Thank you for your comment. This is noted and Navitas will amend text to include size and reference to White-Chinned population on Kidney Island.
FIFD 21	omits GHA, WA, WCP and BBA from SG.	Likely Table 7.13 not 7.32. Note the table highlights ' Metadata from https://data.seabirdtracking.org/dataset. ' Hence, while data exists for the species listed, it may not have been deposited in the seabird tracking database. Navitas will re-check and amend where relevant.
FIFD 22	Omits ACAP Priority Population of BBA from SG. Black-browed albatross can dive to 19 m (Guilford et al. 2022).	Please see response to FIFD 18.
FIFD 23	Omits WCP population from SG.	Please see response to FIFD 21.
FIFD 24	<< In 2019, the FIFD changed the way in which observed seabird mortalities were extrapolated to total mortalities in the fleet by including	Thank you for your comment. This is noted and the text will be amended for clarity.

Reference	Representation	Navitas response
	a 3:1 assumption of 1 mortality for every 3 heavy contacts observed based on Parker et al (2013). >> FIFD did not change the way in which observed seabird mortalities were extrapolated to total mortalities in the fleet. Because in 2019 observer seabird dedicated effort was <2% and no seabird mortality was observed, possible minor injury contacts were used as a mortality proxy. Consequently, estimated seabird mortality numbers are precautionary.	
FIFD 25	<< "ACAP is a daughter agreement to the Convention on the Conservation of Migratory Species of Wild Animals (CMS), which the Falkland Islands are signatories to." >> The U.K is a direct signatory to both ACAP and CMS, not the FI. However, these do fully/partially extend to some UKOTs.	Thank you for your comment. This is noted and the text will be amended to reflect this.
FIFD 26	Omits that in 2011 ACAP identified nine seabird Priority Populations for conservation, which represent >10% of the global total for each species and are declining >3% per annum. These include South Georgia populations of the WA, BBA, and GHA (Phillips et al. 2023). In addition, the WA is locally Endangered (Jiménez et al. 2016).	Thank you for your comment. This is noted and the text will be amended to reflect this.
FIFD 27	<< It is generally considered that there are insufficient data available to describe the foraging and breeding areas, seasonal distribution and abundance, and diet of most marine mammal species in the Falklands… Nonetheless, the available data is sufficient to indicate likely species presence on a seasonal basis. Both the visual and acoustic survey methods described below have recognised limitations which need to be acknowledged. However, datasets have been used in a complementary manner to provide a better overall picture. >> Regarding the acoustic data collected during one year (August 2012-August 2013), the usual sampling rate of the autonomous recorders (48Hz) was too low to collect beaked whale vocalizations, which are the most vulnerable cetaceans to anthropogenic noise (Taylor et al. 2000; Prideaux, 2016; Harding & Cousins, 2022). Beaked whale vocalizations energy peaks range between 35-45 Khz (Rafter et al. 2021); in addition, only 5% of the recordings were analysed (Hipsey et al. 2013).	Thank you for the comment. The AMAR data were collected over a period of a year. However, although old, the SAST did detect some beaked whales. Please see FC comment on the AMAR methodology (FC 129). Navitas believes it has been precautionary in our assessments. In addition, Navitas will be deploying SMMOs in the field three year pre first oil.

Reference	Representation	Navitas response
FIFD 28	<<minke whale>> refers here to the Antarctic minke whale (B. bonaerensis), however White et al. 2002 refers to the dwarf minke whale (B.acutorostrata). The document must clarify that the FI are in the distribution range of both species, which at sea are undistinguishable and which can also be confused with the pigmy right whale (Caperea marginata) (Otley, 2012). So, under the term <<minke whale>> could be at least three different species.	Thank you for your comment. This is noted and the text will be amended to reflect this.
FIFD 29	omits the fact that the Falkland Islands are a beaked whale hotspot (MacLeod & Mitchell, 2006). Although beaked whale habitat normally occurs in deep waters (≥1000 m), Otley (2012) suggested that in the FI beaked whales do use shallower waters, which is known to occur elsewhere (Filatova et al. 2024). S. 7.4.6 also omits to mention that beaked whales are highly vulnerable to anthropogenic sound, which can displace the animals from foraging areas, cause permanent damage, or cause incidental mortality (Barlow & Gisiner, 2006; Weilgart, 2013; Joyce et al. 2018; Feyrer et al. 2024). However, quantifying impacts in open sea is extremely difficult, as the arrival of carcasses to the shore depend on environmental features and human population density (Faerber & Baird 2010; Williams et al. 2011; Prado et al. 2013).	Thank you for your comment. This is noted and the text will be amended to reflect this.
FIFD 30	Beaked whales: all the information from Hyperoodon and Mesoplodon sightings should be included in the same paragraph. On this page it is omitted that sightings of Hyperoodon were carried out at the N, NE and E of the FI (White et al. 2002).	The hyperoodon refers to seasonal variability, while the mesoplodon explains the difficulty in identifying beaked whale to species level - hence the need to separate into different paragraphs. Navitas will update the location of southern bottlenose whale sightings.
FIFD 31	Omits to define “large whale species”. In the text this is also not defined.	The figure text will be clarified to explain that large whale species refers to unidentified large whales.
FIFD 32	<< During this period an increased but small number of >> Incomplete sentence.	Thank you for your comment. This is noted and the typo will be amended.
FIFD 33	Fin whale: following Lanfredi, 2012, add Herr et al. 2022 (large fin whale foraging groups in Gerlache Strait)	Thank you for your comment. This is noted and this reference will be added.
FIFD 34	Southern bottlenose whale: should be together with Mesoplodon under the title <<beaked whales>>.	Please see response to FIFD 30. These are separated on the basis of data availability. Specifically, one species has seasonal data, while the other are

Reference	Representation	Navitas response
	The text omits that Hyperoodon sightings by White et al (2002) took place in the N, NE, and SE of the FI.	unidentified species of Mesoplodon. Text regarding location of sightings will be added.
FIFD 35	Unidentified beaked whales (Mesoplodon species): Ziphiids (beaked whales) include genus Hyperoodon, Ziphius, Berardius, Mesoplodon, and Indopacetus, of which the first four have been recorded in the Falkland Islands (Otley et al. 2011). The sentence “Beaked whales (Mesoplodon species)” is not correct. << All sightings occurred in waters over 1,000 m deep, with the majority coming from the region of the Falkland Trench to the south-east of the Islands >>. Although Mesoplodon sightings from White et al. (2002) took place in waters over 1000m deep, Otley (2012) suggested that in the FI beaked whales do use shallower waters; beaked whales can specialise in the use of coastal habitat (depth <300m) (Filatova et al. 2024). Hyperoodon sightings by White et al (2002) took place in the N, NE, and SE of the FI. << Stranding records indicate that a number of Mesoplodon species could be present within Falkland Islands waters (Otley et al., 2012) >> The correct reference is Otley et al. 2011. The text omits to say that the Falkland Islands are a beaked whale hotspot (MacLeod & Mitchell, 2006) and that beaked whales are highly vulnerable to anthropogenic sound, which can displace the animals from foraging areas, cause permanent damage, or cause incidental mortality (Barlow & Gisiner, 2006; Weilgart, 2013; Joyce et al. 2018; Feyrer et al. 2024). Quantifying impacts in open sea is extremely difficult, as the arrival of carcasses to the shore depend on environmental features and human population density (Faerber & Baird 2010; Williams et al. 2011; Prado et al. 2013).	Thank you for your comment. This is noted and the text will be updated.
FIFD 36	<<The acoustic monitoring survey recorded an unidentified odontocete species (toothed whale; including killer whale and dolphins).>> This sentence is not correct. The killer whale is a dolphin species; the	Thank you for your comment. This is noted and the text will be amended.

Reference	Representation	Navitas response
	term “toothed whale” includes the sperm whale, beaked whales, dolphins, and porpoises.	
FIFD 37	<< (Arctocephalus species) >> The text should mention the actual scientific names of species included in this term.	Thank you for your comment. This is noted and australis and gazella will be added.
FIFD 38	Southern right whale. << Widespread in the southern hemisphere >>. The distribution is circumpolar in the Southern Hemisphere. << Growing population breeds off the coast of Argentina in September, migrates to Southern Ocean in the summer >> is not correct. The southern right whale breeds between July-November in Península Valdés (Argentina) and Santa Catarina (Brazil) (Danilewicz et al. 2016; Mandiola et al. 2019; Renault-Braga et al. 2022) Antarctic minke whale: << Globally, the most common of the rorquals >> is not correct. Southern Hemisphere distribution (Cooke et al. 2018). Dwarf minke whale (Balaenoptera acutorostrata subspecies). Omitted in the whole report. Distribution in mid and lower latitudes of the Southern Hemisphere, up to 69º (Cooke, 2018). Pygmy right whale (Caperea marginata). Omitted in the whole report. Circumpolar distribution, between 30-55ºS (Cooke, 2018a). Beaked whales: only contains one beaked whale species (Hyperoodon). The table omits the rest of available information (i.e. unidentified beaked whale species.) Sei whale: << …. progress can be followed by ‘fluke prints’ left on the surface in the animal’s wake >>. That is a common feature with other whale species, not exclusive for sei whales.	Thank you for your comment. This is noted and the table will be updated.
FIFD 39	Antarctic minke whale (Balaenoptera bonaerensis): These are sympatric species; impossible to distinguish them at sea. White et. al reported all their sightings as B. acutorostrata. The term <<minke whale>> should	Thank you for your comment. This is noted and the text will be clarified.

Reference	Representation	Navitas response
	either include all the species, or clarify that under the term “small whale species” there could be at least three species: B. acutorostrata, B. bonaerensis, and C. marginata. Otley (2012) also states that the 3 species were not differentiated during JNCC surveys. Minkes stranded in the FI were also not differentiated to species level (Otley 2012).	
FIFD 40	Killer whale: Here omits that there are likely to be resident populations. Seen year-round from longline vessels fishing to the north-east of the Sea Lion Field (Yates & Brickle, 2007). Orcas are occasionally seen from Loligo trawlers (FIFD unpublished data).	Thank you for your comment. This is noted and the Yates and Brickle reference will be added sightings to North of the NFB will be clarified in the text.
FIFD 41	Right whale, Antarctic minke whale, Dwarf minke whale, Pygmy right whale, Sei whale: see comments on Table 7.2.8.	Thank you for your comment. This is noted and the table shall be updated accordingly. See also FIFD 38.
FIFD 42	<< As during the 2015 exploration drilling campaign, Navitas will develop and implement a BSMP … >> <<Detailed monitoring requirements have been established during the Environmental Monitoring and Management Plan workshop (Chap. 15).>> It would be useful to see some details of what the 2015 BSMP provided. Chap. 15 does not provide any real detail.	The Sea Lion Phase 1 and 2 Biosecurity Management Plan will be developed after project sanction and prior to the commencement of operations. This will build upon the 2015 exploration Biosecurity Management Plan. The EMMP advisory group will be invited to review and input in to the draft Biosecurity Management Plan prior to its finalisation and issue.
FIFD 43	In this section the document omits to provide information on each step on the Field development and operation, including the types of equipment to be used, the number of each equipment to be used, and the characteristics of the noise to be generated by each of them. << Underwater noise will be generated in the Sea Lion Field throughout the Development and will result from the use of vessels. >> This sentence is incorrect. Besides shipping and vessel traffic, the development and operation of the Sea Lion Field might imply the production of underwater noise by different types of equipment, like: -seismic surveys; -high power sonar (SBES, MBES, boomers, etc.); -explosions; -drilling; -position transponders; -separators, injectors, pumps;	Detail on the full operation is given in the development description, Chapter 5, which is referenced in section 10.4. No seismic surveys are planned, no high power sonar will be used and no explosives are planned to be used in drilling, unless stuck pipe occurs but in this instance explosives would be downhole. Transponders will not be required to site the FPSO or MODU. During construction, transponders may be used to site subsea equipment - these will be used for short period and removed once the subsea construction phase is complete. This will be noted in the section. Also note that the underwater noise modelling is being refined and will be presented in the next iteration of the EIS. See FIFD 54.

Reference	Representation	Navitas response
	-production maintenance. << The properties of sound in water (range and speed of travel) are exploited by many marine animals as a means of communication, navigation and detecting prey or predators. Sound travels at approximately 1,500 m/s in water (about five times faster than in air) and low frequency sound can propagate over hundreds to thousands of kilometres, although the effective range of most biological functions is tens of kms. >> Marine wildlife does not exploit the properties of sound in the water, but actually rely on sound for vital life functions, including communication, prey and predator detection, orientation and for sensing surroundings. Species living in the marine environment are adapted to the natural sound (ambient noise), biological (marine animals) and physical processes (earthquakes, wind, ice and rain). Sound propagation in the water is complex and requires many variables to be carefully considered before it can be known if a noise-generating activity is appropriate or not. It is inappropriate to generalize sound transmission without fully investigating propagation in the actual place. << Human-made (anthropogenic) noise in the marine environment can interfere with these processes and is recognised as having the potential to cause harm to marine animals. Consequently, under-water noise is regarded as a form of pollution. >> Because of diverse activities, in the last century human-made (anthropogenic) noise in the marine environment has increased (Prideaux, 2016). The term “harm” must be specified (e.g. physical, physiological, behavioural impacts). It is known that wildlife exposed to elevated or prolonged anthropogenic noise can suffer direct injury and/or temporary or permanent auditory threshold shifts. Noise can mask important natural sounds, such as the call of a mate, or the sound made by prey or predator. Anthropogenic noise can also displace wildlife from important habitats. These impacts	

Reference	Representation	Navitas response
	are experienced by a wide range of species including finfish, crustaceans, cephalopods, pinnipeds, sea turtles, and sharks (Prideau et al, 2016).	
FIFD 44	Omits the Convention of Migratory Species (CMS), which has published Family guidelines on EIA for marine noise generating activities. All the marine mammal and seabird species, the porbeagle, and their prey are covered by CMS. Regarding pinnipeds and cetaceans, the FI has cetacean and pinniped Action Plans approved by EXCO, which highlight the following actions: 1) To assess and manage acoustic disturbance – including the application of appropriate licence conditions under the Offshore Minerals Ordinance. To assess and manage physical disturbance and development activities such as aquaculture, oil pollution and exploration and extraction industries, including the application of environmental impact assessment where appropriate.	Thank you for your comment. This is noted and will be added
FIFD 45	Because sound exposure can cause mortality, injury to tissues, affect the physiology of living beings, damage to the auditory system, masking of biologically important sounds, and behavioural changes (feeding, breeding, spawning, migration, displacement from ecologically important areas) (CMS, 2017), the Falkland Islands needs to develop new policy regarding Mineral Resources. This new and specific policy should require the EIA to include propagation modelling. The noise models need to be confirmed by acoustic measurements in the field. The EIA needs to describe the methods chosen to reduce or baffle unnecessary high frequency noise, taking account of the noise spectrum before and after the addition of the mitigation measures. Cumulative effects from multiple temporally overlapping or consecutive surveys need to be considered. It is important to mention that the UK permitting systems also requires a detailed impact assessment to support the applications that clearly specifies the potential impacts (OSPAR, 2020). Also, Following CMS (2017), Prideaux (2016) and Weilgart (2023), this section omits to provide a comprehensive description of:	Navitas refers the respondent to FIG DMR regarding their policy on noise. Note the EIS does include propagation modelling, please see section 10.4.4.4.2. No seismic surveys are planned but please note cumulative modelling has been undertaken in section 10.4.4.4.3.2 showing the noise from all activities (drilling, production vessels and offtake vessels at once). Navitas note the OSPAR 2020 guidelines suggested are primarily for 'noise mitigation measures to be applied during pile-driving as well as alternative low noise foundation concepts especially for offshore wind turbines'. As no pile driving is proposed, it is not felt these are most appropriate for the Sea Lion development activities. The vessels modelled and their noise profiles are provided in Table 10.26. No seismic surveys or explosions are planned. Well completion approach now utilises Open Hole Gravel Pack (OHGP) rather than TCP guns.

Reference	Representation	Navitas response
	1) Each of the equipment's to be used; 2) The noise to be generated by each of the equipment's (intensity and frequency); 3) The occurrence of activities like seismic surveys and explosions, with detailed information on equipment, type of explosive, sound intensity level in water @ 1 m, frequency range, and number of detonations and interval time; 4) Description of noise counter measures, as bubble curtains, noise dampers and cofferdams, including a description of technology, best environment practice (BEP), or best available technology (BAT); 5) Identification of other activities having an impact in the region during the planned activity, accompanied by the analysis and review of potential cumulative or synergistic impacts. The EIA needs to provide an explanation of all activity technologies available and why each proposed technology is chosen, including consideration of noise-free installation methods. The EIS needs to specify the total duration of each proposed activity; the proposed timing of operations (i.e. season and time of day, during all weather conditions); sound intensity level (dB peak to peak) in water @ 1 metre and frequency ranges.	Please also note that the underwater noise modelling is being refined and will be presented in the next iteration of the EIS. See response to FIFD 54.
FIFD 46	Moderately intense low frequency noise can cause severe acoustic trauma and mortality in cephalopods. Effects have also been seen in zooplankton lobsters and epibenthos, among others (Harding & Cousins, 2022).	Thank you for your comment. This is noted and the reference will be added and included.
FIFD 47	The EIA focus on the sound pressure, however fish and invertebrates are more susceptible to particle motion (Prideaux, 2016; Popper & Hawkings, 2018; Harding & Cousins, 2022).	Thank you for your comment. This is noted in sections 10.4.4.3.1.1 and 10.4.4.3.2.1. Please note the noise chapters are being revised and updated. Please also refer to FIFD 54.
FIFD 48	<< An SEL threshold of injury of 202 dB re 1µPa2s was agreed on by the panel (SAIC, 2011). The threshold found for the marbled murrelet was applied here to estimate the underwater noise impacts to diving seabirds.>> The threshold of 202 dB is not appropriate. Hansen et al. (2020) demonstrated that the common murre elicits a behavioural response at 110 dB re 1 mPa, similar to the sound levels that affect the harbour	The 202 dB threshold is used as and injury threshold, not a disturbance (behavioural change threshold), Navitas will review the papers suggested. Please note the noise chapters are being revised and updated. Please also refer to FIFD 54.

Reference	Representation	Navitas response
	porpoise. In addition, it has been published that penguins response to seismic surveys within 100km of their colony, penguins avoiding their preferred foraging areas, which made them increase their foraging effort (Pichegru et al 2017).	
FIFD 49	<< Anthropogenic sources of sound in the ocean can disturb marine mammals, evoking behavioural responses, similar to the response to predator risk, and can trigger physiological stress responses (Tyack, 2008; Rolland et al., 2012). >> Impacts of anthropogenic sounds include much more than behavioural responses and stress. Anthropogenic noise can cause physiological damage and mortality, being beaked whales extremely vulnerable (Taylor et al 2000; Barlow & Gisiner, 2006; Hildebrand, 2005; Prideaux 2016; Weilgart 2013; Joyce et al. 2018; Chollewiak et al 2017).	Thank you for your comment. This is noted and this will be added in revised Sections 10.4 and 10.5. Please also refer to FIFD 54.
FIFD 50	This section of the document also omits the fact that the Falkland Islands are a beaked whale hotspot (MacLeod & Mitchell, 2006). Although beaked whale habitat normally occurs in deep waters (≥1000 m), Otley (2012) suggested that in the FI beaked whales do use shallower waters, which is known to occur elsewhere (Filatova et al. 2024). In addition, this section of the document omits to mention that beaked whales are highly vulnerable to anthropogenic sound, which can displace the animals from foraging areas, cause permanent damage, or cause incidental mortality (Taylor et al. 2000; Barlow & Gisiner, 2006; Weilgart, 2013; Joyce et al. 2018; Feyrer et al. 2024). However, quantifying impacts in open sea is extremely difficult, as the arrival of carcasses to the shore depend on environmental features and human population density (Faerber & Baird 2010; Williams et al. 2011; Prado et al. 2013).	Thank you for your comment. This is noted and Section 10.4.6.3.2 will be amended to clarify data gaps associated with beaked whales, which are vulnerable to disturbance. Please note the noise chapters are being revised and updated. Please also refer to FIFD 54.
FIFD 51	<< Of the species of cetacean present in the NFB (Section 7.4.6.2), many are capable of diving to depths in excess of 450 m, although due to the difficulties of working with these animals in an oceanic environment, the maximum dive depths of many species remain unknown. >>	Thank you for your comment. This is noted and Navitas will update the section with references and dive depths from other locations. Please note the noise chapters are being revised and updated. Please also refer to FIFD 54.

Reference	Representation	Navitas response
	There are plenty of research on diving capabilities of teutophagic cetaceans. The sperm whale, the pilot whale, beaked whales and orcas are extreme divers, with deeper and longer foraging dives than any other mammal species (Tyack et al. 2006; Schorr et al. 2014; Towers et al. 2019). Following habitat utilization of beaked whales elsewhere, it is presumed that sighted individuals from fishing vessels operating in the Falklands might be residents (e.g. Gowans et al. 2000; MacLeod & Zuur 2005; McSweeney et al. 2007; Falcone et al. 2009).	
FIFD 52	<< Further, it should be noted that behavioural changes in response to anthropogenic noise, such as moving away from an area for a short period of time, changes in dive-time, masking of communication signals or echolocation clicks for short periods, do not necessarily result in detrimental effects on the animals involved. A reaction lasting less than 24 hours, and not recurring on subsequent days, was not regarded as particularly severe by Southall et al. (2007). >> Impacts of anthropogenic sounds include much more than behavioural responses and stress. Anthropogenic noise can cause physiological damage and mortality, being beaked whales extremely vulnerable (Taylor et al 2000; Barlow & Gisiner, 2006; Hildebrand, 2005; Prideaux 2016; Weilgart 2013; Joyce et al. 2018; Cholewiak et al 2017).	Agreed, this will be added in revised section. Please see response to FIFD 54.
FIFD 53	<<The injury thresholds for each marine mammal group have been reviewed and updated by the National Marine Fisheries Service (NMFS, 2018) and Southall et al. (2019) and are summarised in Table 10.24.>> The SEL metrics reported by NOAA (2018) and Southall et al. (2019) only account for the cumulative exposure to one source in the hearing range of an individual. They do not consider the cumulative or aggregate effect of multiple sources. NOAA (2018) provided advice on how to combine multiple datasets and determine appropriate surrogates when little or no data exists. Southall et al. (2019) stated some important assumptions and limitations for the PTS and TTS thresholds that are proposed. They reported that the TTS and PTS thresholds are derived using median values of available data in several areas. However, they	Thank you for your comment. This is noted and Navitas will ensure these caveats are clarified. Please note the noise chapters are being revised and updated. Please also refer to FIFD 54.

Reference	Representation	Navitas response
	reported that impacts may relate to variability in susceptibility of individuals and the context of exposure scenarios. As such, single threshold criteria underestimate potential effects for some or in some scenarios and overestimate effects for others, the extent of each potential outcome depending on the degree of individual variability as well as key contextual aspects of exposure. The exposure criteria should therefore be used as a guide to predict the potential for PTS and TSS, but not used as an absolute. NOAA (2018) also reported that thresholds do not represent the entirety of an effects analysis, but rather serve as one tool to help evaluate the effects of noise produced during a proposed action on a marine mammal. Other aspects that should be considered within an overall assessment of risk include behavioural impact thresholds, auditory masking assessments and evaluations to help understand the ultimate effects of an impact on an individual's fitness and on populations.	
FIFD 54	The noise-generating modelling presented in the EIA does not provide enough information to provide decision makers with credible and defensible information. The available modelling is not based in local propagation features. In consequence, the document neither identifies the acoustic footprint of the noise that will be generated in the Sea Lion Field, nor provides levels of noise propagation to make informed decisions. New modelling should be carried out following CMS Guidelines on Environmental Impact Assessment for Marine Noise-generating Activities (Prideaux 2016; CMS 2020): 1. Independent, scientific modelling of noise propagation should be impartially conducted. a) Models chosen should be peer-reviewed, scientific source models (as opposed to industry black box models); b) Modelers should have enough knowledge of, and experience with, the models they are using. Modellers should understand the physics	The modelling was conducted by independent experts using models developed in house (by the independent consultant). However, further modelling techniques have since been developed and as such Navitas has chosen to revise and update this this entire section. Please note that the sources of noise originate from the rig and a number of vessels that will be operating in the area. There is no pilling or other source of impulsive sound; anchors will be suction piled as opposed to impact piling. Navitas are confident the impact assessments are valid but has committed to updating this assessment with results from the new modelling now available.

Reference	Representation	Navitas response
	of under-water noise propagation to ensure the correct models are used and that the results are accurate and make physical sense; c) Modelling results should be reviewed by subject matter experts, and experienced modellers with a strong theoretical understanding of underwater acoustics. 2. Propagation models should be: a) based on accurate input data, and for seismic surveys specifically the official calibration figures supplied by the survey vessel to be charted; b) able to accommodate the activity noise frequencies, the water depth, seabed topography, temperature and salinity, and spatial variations in the environment. Model methodology/s used should be stated; c) specific to the source, region and environmental conditions. d) based on accurate input data including seismic source data and environmental data, such as: - geo-acoustic properties, including bottom sediment types and their layer depths for the region to be modelled, ideally down to several hundred metres into the bottom. - bathymetry mapping grid resolution greater than 450m - seasonally relevant Sound Speed Profiles (SSPs), salinity, temperature and depth data (in tabulated form). e) chosen based on the treatment of environmental conditions, with an appropriate rationale for the modelling choice provided in the modelling report. f) given special consideration for fiords and deep-water canyons and may require high-resolution 3D models. g) biologically relevant and able to handle a wide range of frequencies, including very high and very low frequencies, regardless of the proponent's frequency focus. The computational difficulty of modelling very high frequencies is not a reason for disregard.	

Reference	Representation	Navitas response
	3. Propagation modelling should include: a) the received sound levels at given distances from the noise source to determine propagation loss. b) full frequency bandwidth of a proposed anthropogenic noise source. c) the intensity/pressure/energy output within that full range. d) the principal or mean/median operating frequency of the source(s). e) the same season/weather conditions as the proposed activity accounting for local propagation features (depth and type of sea bottom, local propagation paths related to thermal stratification, SOFAR or natural channel characteristics). f) sound propagation and cumulative exposure data that is appropriate to the full range of concurrent noise generating activities. These should include separate modelling of each noise generating activity (i.e.. shipping, support vessels, sonar, seismic surveys), as well as a cumulative model of all these activities combined. g) appropriate single shot modelling that is correctly reprehensive of the survey region. Biologically important sub-regions may require additional focus. h) representation of cumulative exposure over time (i.e. 24 hours). i) acoustic ground-truthing of the chosen model (to ensure model credibility). 4. Propagation modelling reports should demonstrate: a) propagation from point source out to a radius where the noise levels generated are close to natural ambient sound levels. b) particle motion propagation to assess the impact on invertebrates and fish species. c) proposed exclusion zones designed for the protection of specific species and/or populations should be identified and mapped and should demonstrate how noise will not propagate into these areas, taking into consideration the local propagation features. d) border thresholds will not be breached for exclusions zones and biologically important areas.	

Reference	Representation	Navitas response
	e) that all modelling assumptions are clearly stipulated and comprehensively justified.	
FIFD 55	Besides shipping and vessel traffic, the development and operation of the Sea Lion Field might imply the production of underwater noise by different types of equipment, like: -seismic surveys; -high power sonar (SBES, MBES, boomers, etc.); -explosions; -drilling; -position transponders; -separators, injectors, pumps; -production maintenance. However, the EIA omits to provide a comprehensive description of the equipment, the activities, the individual noise and accumulated noise that will be produced in the Sea Lion Field. In Section 10.4.5 <<Industry standard mitigations >> the EIA only includes vessel noise, and wrongly says that "there are no industry-standard mitigation measures specifically designed to reduce the impact of vessel noise on fauna". The CMS in June 2023 published Best Available Technology (BAT) and Best Environmental Practice (BEP) for Mitigating Three Noise Sources: Shipping, Seismic Airgun Surveys, and Pile Driving – Technical Series No. 46 (Weilgart, 2023). The EIA omits to provide a comprehensive description of: each of the equipment's to be used; the noise to be generated by each of the equipment's (intensity and frequency); the occurrence of activities like seismic surveys and explosions, with detailed information on equipment, type of explosive, sound intensity level in water @ 1 m, frequency range, and number of detonations and interval time; description of noise counter measures, as bubble curtains, noise dampers and cofferdams, including a description of technology, best environment practice (BEP), or best available technology (BAT); identification of other activities	See response to FIFD 43.

Reference	Representation	Navitas response
	having an impact in the region during the planned activity, accompanied by the analysis and review of potential cumulative or synergistic impacts.	
FIFD 56	Moderately intense low frequency noise can cause severe acoustic trauma and mortality in cephalopods. Effects have also been seen in zooplankton lobsters and epibenthos, among others (Harding & Cousins, 2022). The EIA focus on the sound pressure, however fish and invertebrates are more susceptible to particle motion (Prideaux, 2016; Popper & Hawkings, 2018; Harding & Cousins, 2022). The threshold of 202 dB is not appropriate for seabirds. Hansen et al. (2020) demonstrated that the common murre elicits a behavioural response at 110 dB re 1 mPa, similar to the sound levels that affect the harbour porpoise. In addition, it has been published that penguins' response to seismic surveys within 100km of their colony, penguins avoiding their preferred foraging areas, which made them increase their foraging effort (Pichegru et al 2017). Regarding marine mammals, impacts of anthropogenic sounds include much more than behavioural responses and stress. Anthropogenic noise can cause physiological damage and mortality, being beaked whales extremely vulnerable (Taylor et al 2000; Barlow & Gisiner, 2006; Hildebrand, 2005; Prideaux 2016; Weilgart 2013; Joyce et al. 2018; Cholewiak et al 2017). The exposure criteria should therefore be used as a guide to predict the potential for PTS and TSS, but not used as an absolute. NOAA (2018) also reported that thresholds do not represent the entirety of an effects analysis, but rather serve as one tool to help evaluate the effects of noise produced during a proposed action on a marine mammal. Other aspects that should be considered within an overall assessment of risk include behavioural impact thresholds, auditory masking assessments and evaluations to help understand the ultimate effects of an impact on an individual's fitness and on populations.	Thank you for your comment. This is noted and he underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections of the EIS are also being updated with relevant citations suggested during the public consultation and with consideration for the comments received. Please also refer to FIFD 54.
FIFD 57	<< Each vessel will have its own individual 500 m exclusion zone. >> Meaning exclusion from any other vessels being anchored within 500 m, or traversing within 500 m? Does this help to mitigate underwater noise?	Yes, exclusion from any other vessel being anchored within that 500m or from traversing that 500m exclusion zone. Exclusion zones are not

Reference	Representation	Navitas response
		proposed as mitigations to the effect of underwater noise but for vessel safety.
FIFD 58	<< The goal was a phase-out of discharge of these chemicals by 1st January 2017, and this was largely achieved >> Meaning it was achieved in general globally, or in the Falkland Islands particularly, and if so how much is <<largely>>?	The phase out of Substitution chemicals is required under OSPAR Recommendation 2006/3 on 'the environmental goals for the discharge by the offshore industry of chemicals that are, or which contain, substances identified as candidates for substitution'. The OSPAR Convention is a legal agreement that guides international cooperation to protect the marine environment of the North-East Atlantic. The OSPAR Convention's contracting parties include: Belgium, Denmark, Finland, France, Germany, Iceland, Ireland, Luxembourg, The Netherlands, Norway, Portugal, Spain, Sweden, Switzerland and United Kingdom. In the UK, operators have to report annually (production) and per project (for drilling/workovers etc) on their progress in selecting non-Substitution chemicals and where non-substitution chemicals are still used, or alternatives are not yet available, this must be justified.
FIFD 59	The CMS in June 2023 published Best Available Technology (BAT) and Best Environmental Practice (BEP) for Mitigating Three Noise Sources: Shipping, Seismic Airgun Surveys, and Pile Driving - Technical Series No. 46 (Weilgart, 2023). This report demonstrates that the regulation of vessels speed, routes, and avoidance of steaming parallel to the coast comprise best practice for shipping and reduce the noise footprint, mitigate collisions with whales, reduces fuel consumption and greenhouse emissions. It is crucial BAT and BEP are enforced in the Sea Lion Development.	Thank you for your comment. This is noted and vessel speed and maintenance of vessels are included in mitigations for noise reduction and speed reduction is included as a mitigation for minimising the risk of collision with marine mammals. Navitas will also follow the Falkland Islands Cetacean Code of Conduct. The EIS will be amended so that the Code of Conduct is added to the guidelines.
FIMA 1	1.3.1 – Regulatory Overview (page 30). Maritime Ordinance 2017 should be listed.	Thank you for your comment. This is noted and will be amended.
FIMA 2	2.2.3.2 – Installation (page 76). 'FIG Marine Authority' (and other name variations) should be read as 'Falkland Islands Maritime Authority' throughout the document.	Thank you for your comment. This is noted and will be amended throughout.
FIMA 3	3.1.7.1 – International treaties and legislation relevant to the Falkland Islands. To note that the following international conventions listed have not yet been extended to the Falkland Islands by the UK:	Thank you for your comment. This is noted and will be amended.

Reference	Representation	Navitas response
	a. International Convention on Maritime Search and Rescue 1979. b. International Convention on the Control of Harmful Anti-fouling Systems on Ships 2001. c. International Convention for the Control and Management of Ship's Ballast Water and Sediments 2004 . Notwithstanding the issue of extension, under the Convention all vessels flagged to signatory states are required to hold certification confirming compliance with performance standard D-2 and to hold onboard an approved Ballast Water Management Plan.	
FIMA 4	3.1.7.3 – Falkland Islands national legislation. Maritime Ordinance 2017 should be listed.	Thank you for your comment. This is noted and will be amended.
FIMA 5	3.2.8 – Emergency Response. An FIG Integrated Offshore Emergency Response (IOER) plan is currently (July 2024) in draft and will be shared with Navitas to ensure coherence with their Emergency Response Plans.	Noted thank you, Navitas look forward to collaborating with FIG on Emergency Response to ensure integrated plans. Navitas do not propose an amendment to document.
FIMA 6	3.2.18.1 – Sea Lion Field Northern Development Area management plans. FIMA looks forward to working with Navitas on the Harbour Management Plan (HMP).	Noted thank you for the comment.
FIMA 7	4.5.9 – Oil Spill Offshore. This section discounts dispersants and skimmers as viable options to respond to offshore oil spills because the oil is too waxy. No alternative options are offered here, although a return to the subject is promised later in the Statement.	Dispersants and oleophilic and weir skimmers are not considered suitable for this crude type. For Sea Lion crude, the CEDRE 2017 report states that 'oleophilic skimmers should not be recommended, as well as weir skimmers'. However, the report indicates that belt skimmers and nets would be appropriate. Weir skimming devices have been selected to respond to MGO spills. This equipment is specified in the Preliminary OPEPs submitted to FIG for review. Please see section 12.1.1.1.3 and the OPEPs for more detailed information. See also DMR 55. The text regarding the use of skimmers will be clarified in the relevant sections of the EIS.
FIMA 8	5.4.3 – Mobile Offshore Drilling Unit (MODU). Clarity needs to be established regarding how and by whom the 500m exclusion zone around the MODU (required under the Offshore Minerals Ordinance	A dedicated ERRV (Emergency Response and Rescue Vessel (also known as "standby vessel") will be on standby at all times and ward off incoming 3rd party vessels and ensure no infringement of the 500m zone will occur.

Reference	Representation	Navitas response
	1994) will be enforced. There will also be requirements to amend hydrographic publications and disseminate the information.	Vessel entry into the 500m zone will be controlled by permit and in accordance with the MODU Marine Operations Manual and MODU Safety Case. It is expected that marine activity close to the MODU will significantly reduce once the installation is on location and the relevant authorities and marine maps are updated.
FIMA 9	5.5.1 – Large Transport Vessel support. a. The indicative Large Transport Vessel (LTV) anchorages are noted. Final positions will be determined during future meetings between Navitas, FIMA, pilotage providers etc. b. Similarly to 5.4.3 above, clarity needs to be established regarding how, by whom and under what powers any 500m exclusion zone around the LTVs in Berkeley Sound will be enforced. There will also be requirements to amend hydrographic publications and disseminate the information. c. In order to put appropriate harbour management plans in place, more detail will be required on the LTVs themselves and activities likely to be associated with them, including the types of vessels rafting up, the frequency and duration of visits – and activity associated with visits such as the transfer of fuels, chemicals and large cargo. d. More detail is required on how will these vessels be serviced with regard to the discharge of food wastes, sullage and other discharges.	These are all good points. Navitas shall work closely with FIMA throughout the planning and execution stages of the development to ensure that: - final positions for the LTV anchorage sites are agreed and well communicated to mariners and other users of the sea - Activity Specific Operating Guidelines (ASOGs) are developed for the vessels operating in the area - FIMA is advised of all vessels planning to operate in the area - FIMA is advised of the activities and equipment / product transferred between vessels.
FIMA 10	5.11.1.1 – Port facilities. Although the majority of berthing activity will be centred on the Temporary Dock Facility (TDF) the wider impact of much increased maritime traffic using Stanley Harbour, Port William and Berkeley Sound needs to be fully examined to ensure de-confliction with other key users, adequate resourcing of harbour operations (anchorages, berths, pilotage, tugs) and ultimately the safe management of harbour operations.	Please refer to Section 11.2 Other users of the sea inshore for further detail on the planned use of the TDF and vessel movements within Stanley Harbour and Berkeley Sound. Navitas will work with FIMA as plans develop. As noted in the response to FIMA 9, Navitas agrees with these comments and is keen to work closely with FIMA throughout the planning and execution of the development.

Reference	Representation	Navitas response
FIMA 11	5.11.1.1.1 – The Temporary Dock Facility (TDF). This section makes reference to a requirement to increase the depth of water at the TDF. Falkland Islands legislation currently lacks provisions to support dredging operations however FIMA are liaising with AG Chambers over future legislative requirements.	The Falkland Islands planning process (including EIA) will be followed. Navitas will prepare a planning application and associated EIA as directed by the FIG Planning Department. Planning Permission was previously awarded to dredge an additional 0.5m along the TDF berthing face but has now expired. Navitas will liaise with FIG Planning and FIMA, and the AG's Chambers as necessary, throughout.
FIMA 12	5.11.2 – Use of vessels. It is acknowledged that the figures cited assume a maximum number of vessels to provide a worst case for impact and risk. That said, the estimate of total extra vessel 'days' for Stage 1 is 5,373 over 31 months, equating to an average of 5.6 extra vessels per day and for Stage 2 the total is 7,072 over 35 months, equating to an average of extra 6.5 vessels per day. The impact of this increase in traffic on harbour control, pilotage services, harbour launch provision, tug support, anchorages and berths needs to be fully scoped, understood and planned for, including the allocation by FIG of adequate resources to ensure harbour operations can be safely conducted.	As noted in the response to FIMA 9, Navitas agrees with these comments and is keen to work closely with FIMA throughout the planning and execution of the development. These numbers have significant contingency built in and Navitas will refine these requirements should approvals be granted.
FIMA 13	5.11.3.2 – Search and Rescue (SAR) exercises. Close liaison between Navitas and the FI SAR Committee will be required in order to ensure coherence with the FI SAR Strategy and FI SAR Plan, both updated in June 2024.	Agreed - Navitas looks forward to working closely with FIG in this regard.
FIMA 14	7.6.2 – Sensitivity of north Falkland coastline to offshore oil (Crude/diesel) spills. a. Whilst assessing the north Falklands coastline (particularly on East Falkland) as the most likely site of coastal contamination, this section however goes on to highlight the need for prioritization in response to any spill, saying: 'A pragmatic compromise will need to be reached that balances the importance of a site with the level of resources that are required. This may mean that some important sites may not be tackled in favour of other more accessible sites…'. The lack of alternative suggestions regarding further mitigation indicates that more work is required on this issue. b. Contamination of the north Falklands coastline would clearly be most	Part a. In the very unlikely event of an oil spill, each spill would be considered on a case-by-case basis with a net environmental benefit analysis (NEBA) completed. The preliminary OPEPs and the work completed in the EIS are illustrative examples based on historical metocean and weather datasets and volume / type of oil assumptions but would be refined should such an incident occur. Part b. This is a valid point. However, the likelihood of sustained Northerlies (for over 30 days) is not expected and the resources (both equipment and personnel) to manage a response in the event of international support delay is available on the islands.

Reference	Representation	Navitas response
	likely in the event of consistent northerly winds. Whilst noting that any oil would take a number of days to reach the north Falklands coastline, those same northerly (rotor-inducing) winds are likely to impact on the arrival of responders from overseas in the event of a major spill.	
FIMA 15	7.7.3.2 – Other users of Berkeley Sound and the east coast. Although this section acknowledges the role of Berkeley Sound in support of the fishing industry, it does not fully capture how busy the Sound can be during successful fishing seasons. For example, in March 2024 there were as many as 7 reefers, 2 tankers and 30+ fishing vessels in the Sound on a daily basis.	Noted, thank you a 'pers. comm' observation will be added to this effect to reflect the busy period noted in March 2024.
FIMA 16	7.7.4.1.3 – Port facilities in Berkeley Sound. Although routinely used by the fishing industry for transhipping, Berkeley Sound is also regularly used by vessels of all kinds for shelter in adverse weather conditions. All vessels crossing the Reporting Line report to 'Stanley Port Control', not the Fisheries Department.	Thank you for your comment. This is noted and will be amended.
FIMA 17	10.7.1.1 – Relevant legislation. Part 14 of the Maritime Ordinance 2017 (Dumping and Deposits at Sea) should be listed under 'Relevant Falklands legislation'.	Thank you for your comment. This is noted and will be amended.
FIMA 18	10.7.1.1.5 – The PON 8 and oil sheen reporting. In addition to the Department of Mineral Resources (DMR), all oil sheen reports should also be made to FIMA. Further reporting guidance is contained within the NOSCP.	Thank you for your comment. This is noted and will be amended. Navitas note that the preliminary OPEPs submitted to FIG acknowledge that PON 8 notifications/oil sheen reports will also be made to FIMA
FIMA 19	10.11.5 – Industry-standard mitigation measures (to reduce the risk of collisions between vessels and marine animals). The reference to Navitas' operating procedures to limit maximum vessel speeds to 10 knots or less in certain areas is welcome and will complement existing procedures which see FIMA promulgating warnings and advisory speed limits in Port William and Berkeley Sound if whales have been reported in the vicinity.	Thank you for your comment. Navitas note that project specific mitigation reduces speed further to 8 knots at the entrance to Berkeley Sound. This is expected and reasonable and shall form part of the Vessels operating procedure and Area Specific Operations Guidelines (ASOGs).
FIMA 20	11.1.1.1.1 - Navigational Compliance. The expansion of Rule 7 to include reference to Automatic Identification System (AIS) should be removed or amended., as the current wording implies that it can be used as a stand-alone collision avoidance system. AIS can however be used	Thank you for your comment. This is noted and will be amended.

Reference	Representation	Navitas response
	with discretion and in combination with other systems and/or visual tracking.	
FIMA 21	11.1.1.1.2 – Offshore Exclusion Zones (safety zones). a. If retained, 'Notes to Mariners' should be changed to read 'Notices to Mariners'. b. Instead of the bulleted list in this paragraph, suggest replace with 'details of exclusion zones to be promulgated via Maritime Safety Information (MSI) under Coastal State obligations'. This wording will ensure that all means of promulgation are covered, not just those listed.	Thank you for your comment. This is noted and will be amended as per point b.
FIMA 22	11.1.2.3 – Additional vessels. The phrase "while at sea, all Navitas project vessels which are not at anchor will maintain 24hr watchkeeping using radar, AIS and visual sightings" suggests (likely unintentionally) that Navitas project vessels at anchor will not maintain 24hr watches, which they are required to do under COLREGS 1972.	Thank you for your comment. This is noted and was not the intention. The text will be amended accordingly.
FIMA 23	11.1.5.3 - Vessel operations. There is much emphasis on AIS in mitigating the risk of collision, which is relevant but AIS, if fitted, must be used in concert with the use of radar and visual lookout.	Thank you for your comment. This is noted and will be clarified.
FIMA 24	11.2.2.2.2 – LTV presence in Berkeley Sound. As noted in this section, final positions for the LTVs will be determined during future meetings between Navitas, FIMA, pilotage providers etc.	Thank you for your comment. This is noted and agreed.
FIMA 25	11.2.4.4.1 – Exclusion Zones. Clarity needs to be established regarding how, by whom and under what powers any 500m exclusion zone around the LTVs will be enforced.	Thank you for your comment. This is noted. Please see above response to comment FIMA 8. The potential for an exclusion zone and how this will be managed will be discussed with FIMA (notice to mariners, guard vessel, etc.) The future approach to selecting the final LTV locations, and determining the specifics of any proposed exclusion zone in consultation with FIMA will be noted in the post consultation EIS.
FIMA 26	11.2.4.4.1.1 – Reduced anchorage availability. Aside from bunkering and trans-shipment operations, vessels also use Berkeley Sound for shelter in adverse weather. Sheltering vessels will not always anchor.	Thank you for your comment. This is noted and will be amended.
FIMA 27	11.2.5.2 – Vessel Operations. Navitas' harbour management plans for hydrocarbons-related shipping will be developed in close cooperation	Thank you for your comment. This is noted and agreed.

Reference	Representation	Navitas response
	with FIMA, which exercises overall control of shipping movements in Stanley Harbour under the Harbours and Ports Ordinance 2017.	
FIMA 28	11.2.6.1.1 – Disturbance to other users within Stanley Harbour. Assessing the severity of the effect of additional vessels fuelling at FIPASS as 'Minor' may underplay the level of disturbance during busy periods in the fishing and cruise ship seasons, especially if a dedicated fuel line is not added to the TDF. In addition, a greater understanding is required regarding the capacity of those delivering pilotage services to cope with increased demand.	A dedicated fuel line from Stanley Services tank farm to the TDF is planned therefore it is expected that Navitas' use of FIPASS will be very limited. The comment on pilotage services is well noted and Navitas will work closely with FIMA and the pilotage service throughout the planning period and during operations to ensure that the service is not overwhelmed and that additional capacity can be sourced as required.
FIMA 29	11.2.6.1.2 – Loss of anchorage space due to exclusion zones in Berkeley Sound. To say that Berkeley Sound is 'largely unregulated' is not true. Although anchorages have not hitherto been formally allocated in the Sound, vessels are still required to make entry and departure reports and whilst using it vessels are subject to the same general regulatory regime as those using Port William and Stanley Harbour.	Thank you for your comment. This is noted and will be amended.
FIMA 30	11.2.6.1.3 – Potential positive impact of the presence of Phase 1 and 2 Vessels. Noted and very welcome. When plans are mature enough, FIMA will be keen to learn what tug capability Navitas may deploy to the Stanley Harbour area.	Navitas shall keep FIMA advised of the vessels it has chartered and their capabilities.
FIMA 31	11.2.6.2.1 – Collisions in Stanley Harbour. Although the seasonal nature of traffic using Stanley Harbour is acknowledged elsewhere in the EIS, the phrase in this section "it will remain a relatively quiet port" is an over-generalization. Risks of collision need to be measured against the busy periods for the fishing and cruise ship industries when the port is anything but quiet.	Thank you for your comment. This is noted and the text has been amended to 'A relatively quiet port with notable busy periods during cruise ship and fishing seasons'. The precautionary approach of this assessment does include assessing the risk of collisions at busy times.
FIMA 32	11.2.9.2 – Berkeley Sound. Although the context of the statement is understood, it is not correct to say "any vessel at anchor effectively has an exclusion zone around it".	Thank you for your comment. Navitas will clarify the text.
FIMA 33	11.2.10.4 – Monitoring required. Agreed.	Noted
FIMA 34	12.1.1.1 – Legislation relevant to oil and diesel spills. Under Falkland Islands Legislation, reference should be made to the Maritime (Ship to Ship Transfer) Regulations 2023, which came into force on 30th November 2023.	Thank you for your comment. This is noted and will be amended.

Reference	Representation	Navitas response
FIMA 35	12.1.1.1.1 – National Oil Spill Contingency Plan (NOSCP). The NOSCP will need a root-and-branch review to ensure coherence between it and Navitas' Oil Pollution Emergency Plan (OPEP), including clearly defining where responsibilities for shoreline protection and clean-up lie.	Thank you for your comment. This is noted and Navitas look forward to working with FIMA/FIG on this. Navitas has prepared and submitted preliminary OPEPs for FIG review (August 2024). Operational OPEPs will be completed and submitted to FIG for approval at least 6 months prior to commencement of operations.
FIMA 36	12.2.1.1 – Relevant legislation. As highlighted under 12.1.1.1, reference should be made to the Maritime (Ship to Ship Transfer) Regulations 2023.	Thank you for your comment. This is noted and will be amended.
FIMA 37	12.2.7 – Project-specific mitigation measures. Close coordination between Navitas and FIMA over harbour management plans will be key. Bunkering operations will also need to conform to the provisions of the Maritime (Ship to Ship Transfer) Regulations 2023.	Thank you for your comment. This is noted and agreed.
FIMA 38	12.3.4.1.3 – Vessel approaches. The point has been made earlier in this response but the phrase in this section "by international standards the harbour is not regarded as a busy port and collisions and groundings should be readily avoidable" down plays how crowded the port can get during busy periods for the fishing and cruise ship industries. It also does not take into account the significant impact of strong winds on the likelihood of groundings, as manifested in the grounding of the reefer FRIO CHIKUMA in April this year.	See response to comment FIMA 31 above.
FIMA 39	12.3.5.2 – Vessel approaches. Already noted under earlier sections but – agreed - close coordination between Navitas and FIMA over harbour management plans will be key.	Thank you for your comment. This is noted and agreed.
FIMA 40	12.3.10 – Confidence. There is no need to rely on 'collective memory' regarding fuel spills, collisions and groundings, as official records are held by FIMA dating back to the 1990s. These can be made available to Navitas in support of further reporting.	These records have now been provided by FIMA and will be utilised to update the EIS.
FOR 1	It is noted that the intention now is for 'direct offtake' at the oil field with no STS operation for crude oil in Berkeley Sound. There is a requirement for 2-3 large transport vessels (LTV), with exclusion zones, for up to c 13 months. Berkeley Sound is the main harbour used for seasonal Illex squid transhipment operations. Reliance on a range of services from Stanley supporting these transhipments means there are no realistic alternatives.	These are all good points. Navitas shall work closely with FIMA and consult with FIFCA throughout the planning and execution stages of the development to ensure that: - final positions for the LTV anchorage sites are agreed and well communicated to mariners and other users of the sea - Activity Specific Operating Guidelines (ASOGs) are developed for the vessels operating in the area

Reference	Representation	Navitas response
	The EIS assesses that the loss of anchorage space due to the LTVs will be low impact, which we hope will prove to be the case. We also hope that there will be no great impact or restriction on Illex transhipping operations which take place on a 24/7 basis.	The LTVs (and 500m radius exclusion zones around both vessels) will take up 1.349% of the area of Berkeley Sound so are not considered to pose a significant impact to other users of the area. Of note: there will only be two LTV's in Berkeley Sound at any time.
FOR 2	The EIS states that 'over-trawlable' subsea infrastructure is not considered necessary due to water depth and lack of fishing activity. That may be now, but it is not necessarily the case for ever. There are areas fished now which were not fished 30 years ago. This links to decommissioning as whilst the Sea Lion exclusion zones are in place trawling should only be at some distance. Once the site is abandoned/decommissioned it will be another matter. It is indicated that the decommissioning plan/commitment is a separate exercise and for the future. Our view is that the approach to decommissioning should be made clearer now and that the seabed should not be left fouled.	The Sea Lion subsea infrastructure will remain within exclusion zone whilst the field is operational. In accordance with Falkland Islands Government legislation decommissioning is subject to a separate EIA but it should be noted that the regulations state once a field is decommissioned all subsea infrastructure shall be removed, consequently there would be no requirement for overtrawable structures. See also DGN 3.
FOR 3	Page 464: There are 3 charts showing valid fishing areas. Chart b) may be correct for finfish, but chart c) is not correct for Illex (it looks like a duplicate of b). The valid area for Illex covers a different area and includes and extends beyond the Sea Lion location. It is recognised that fishing for Illex does not extend to the full extent of the valid licence area for Illex licences. However, Illex fishing and Illex migrations occur closer to the Sealion area than portrayed by this chart.	Thank you for your comment. This is noted and the corrected charts will be placed in the post-consultation EIS. Additional information demonstrating the location of illex fishing in relation to the Sea Lion Field was presented in the FIFCA EIS presentation and will be published in the post consultation EIS. The information demonstrates that there is no fishing overlap but vessels do occasionally transit over the Sea Lion field area.
FOR 4	Page 484: The paragraph on the Falkland Islands economy characterises the fishing economy as "in 1990, the bulk economic activity shifted to the sale of fishing licences to foreign vessels" & "income from license fees fluctuates". It is noted that the EIS is quoting from other publications, but it is an obsolete characterisation which sells the FI fishing industry short. FIG Treasury data and other sources will show that corporate tax take from FI fishing companies is a very significant revenue stream but which also reflects the wider economic activity of FI fishing companies, investment and operation of FI registered vessels as well as partnering with overseas companies and vessels. A summary of GVA/GDP is added below showing that the fisheries sector accounts for c. 60%.	Navitas is required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries and tourism analysis incorporating information from case studies from elsewhere and Falkland Islands specific information). This requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.

Reference	Representation	Navitas response
	The important point is that if there is an activity or accident which has a negative impact on the fishery in terms of magnitude it is not a few foreign licence fees at stake it could be a serious chunk of the entire FI economy.	
FOR 5	Illex (or Argentine Shortfin squid) are one of the most significant resources in the Southwest Atlantic and seasonally in FI conservation zones. The major potential pollution events of a blow-out or loss of FPSO cargo are indeed hopefully highly unlikely. There is some overlap between the Illex distribution both in FI zones and on high seas with the modelling of oil dispersion from those pollution events. In view of the significance of the Illex resource it is considered that there might have been more scope to model the potential interaction of Illex and oil. The table at page 1154 does capture the potential severity of impact to a degree. A spill which affects part of the fishery might have a wider reputational impact, or wider spread measures and restrictions due to a precautionary approach.	See response to FOR 4. In addition to this, within the Oil Spill Financial Liability Assessment actual and reputational damage as well as long term marketing impact have been considered thus demonstrating the maximum level of compensation (and therefore Navitas' insurance) to cover such an (albeit highly unlikely) event.
FPN 1	**REDACTED**	**REDACTED**
FPN 2	The International Energy Agency has stated that no new oil and gas fields should be opened if we are to achieve net zero emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit. Opening a new oil field in the Malvinas Islands would not align with this, therefore Fundacion Patagonia Natural rejects this decision emphatically. Fundacion Patagonia Natural believes the EIS sets out an avoidable and clearly environmentally damaging development proposal. The Environmental Impact Statement is clear that the development would create serious environmental damage and is a project that could be avoided. The millions of tonnes produced during the development and the more than 100 million tonnes from burning of Malvinas oil represents a carbon bomb to the atmosphere. Regrettably, the EIS and proposed development is inconsistent with best practice standards & global climate. The EIS lists CO2 emissions from oil production at approximately 9 million tonnes (p.825 of EIS). Emissions from the burning of Malvinas	Thank you for your comment. This is noted. Please refer to the response to FC 1.

Reference	Representation	Navitas response
	Sea Lion field oil (a legitimate inclusion in the Statement1) are listed as more than 150 million tonnes if production were to be maximized. The developers have also indicated that further development phases could more than double production of Phases I and II. The Malvinas Islands are well known for its globally significant marine wildlife. Yet, essential information on key animal groups – which we need to understand impacts – are missing, in particular seabirds. The presented seabird data is more than 20 years old. It is well-known that climate change is rapidly changing the distribution of seabirds and their prey at sea.. Projects are expected to provide comprehensive data on bird distributions and movements over a two-year period at considerable cost, before submitting consent applications. This is done ahead of projects being approved, and with all the associated risks of having to change the development. We would consider that this Environmental Impact Statement has cut corners in this potentially expensive aspect of data collection. The International Energy Agency has stated that no new oil and gas fields should be opened if the world is to achieve 'net zero' emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit. This project is a threat to achieve this goal.	
H&S 1	Hazardous waste legislation is devolved in the UK and these amended. regs are only used in Scotland. Does this mean that all hazardous waste exported to the UK will arrive into Scotland, otherwise reference needs to be made to the Hazardous Waste (England & Wales) regulations 2005 as well.	If waste does need to be transported back to the UK, it is expected that it will arrive in Scotland and be managed / treated / disposed of in Scotland as was the case in the previous exploration drilling campaigns.
H&S 2	Oily wastewater will usually be classified as either EWC 13:05:07* or possibly 19:08:10* (if arising from a registered waste treatment facility) both of which are Absolute Hazardous Waste entries in WM3. In this case, how can it be discharged to foul sewer under a consent (particularly as there are currently no treatment facilities on the islands)?	The post consultation EIS will clarify that onshore oily waste water will not go into the Stanley sewerage system. Onshore operations which may result in oily water discharge will be completed in a bunded area which will contain the oily water, this will then be treated, incinerated or dealt with away from the sewerage network and shall align with Navitas' Waste Management Procedure.

Reference	Representation	Navitas response
		It is understood that the FIG Stanley Incinerator will be operational by end 2025. This aligns with Navitas' operational schedule. Should the FIG Stanley Incinerator not be available Navitas would: 1. Store the waste in suitable containers onshore until the FIG incinerator is once again available; or 2. Store the waste in suitable containers onshore until offshore treatment on board either the MODU or FPSO is available 3. Store the waste in suitable containers onshore until a suitable volume is ready for export under the Basel Convention to the UK. Waste oils from this process shall always ben candidates for re-use, incineration is a secondary solution.
H&S 3	The disposal option for the aerosol and gas cylinder waste stream identifies Hazardous Landfill as one of the options: Most of this waste stream will be classed as "Flammable" (as propane is usually used as the propellant gas nowadays) and all flammables are banned from landfill disposal under the Landfill Directive (Article 5(3)b).	Understood, these waste streams will not go to landfill, the text in the chapter will be checked for clarity in the post consultation EIS.
H&S 4	The disposal option for the hazardous electrical waste stream identifies Hazardous Landfill and Recovery (which is usually EfW) as the options: Waste electronics and electrical equipment is classed as "WEEE", and the current UK WEEE regulations legally require all such waste to be diverted from landfill or incineration (which means producers of WEEE in any form have a responsibility to recycle and reuse any electrical waste where possible).	Understood, these waste streams will not go to landfill, text in the chapter will be checked for clarity in the post consultation EIS.
H&S 5	The disposal option for the non-hazardous electrical waste stream identifies Hazardous Landfill and Recovery (which is usually EfW) as two of the three options: As above, waste electronics and electrical equipment is classed as "WEEE", and the current UK WEEE regulations legally require all such waste to be diverted from landfill or incineration (which means producers of WEEE in any form have a responsibility to recycle and reuse any electrical waste where possible).	Understood, these waste streams will not go to landfill, text in the chapter will be checked for clarity in the post consultation EIS.
H&S 6	The disposal option for the oily water waste stream identifies Treat to Sewer as the option: Are sewage treatment facilities available on the islands, if not, then this should be, treat to registered discharge (covering discharges that go direct to a controlled water source). The consent limits	Onshore oily waste water will not go into the Stanley sewerage system. This will be clarified in the post consultation EIS. Onshore operations which may result in oily water discharge will be completed in a bunded area which will contain the oily water, this will then be treated, incinerated

Reference	Representation	Navitas response
	are likely to be different in this case (and it would probably not be allowed).	or dealt with away from the sewerage network and shall align with Navitas' Waste Management Procedure. It is understood that the FIG Stanley Incinerator will be operational by end 2025. This aligns with Navitas' operational schedule. Should the FIG Stanley Incinerator not be available Navitas would: 1. Store the waste in suitable containers onshore until the FIG incinerator is once again available; or 2. Store the waste in suitable containers onshore until offshore treatment on board either the MODU or FPSO is available 3. Store the waste in suitable containers onshore until a suitable volume is ready for export under the Basel Convention to the UK. Waste oils from this process shall always ben candidates for re-use, incineration is a secondary solution.
H&S 7	Footnote 3 states that: “Any food waste returning to the supply base, for example if offshore macerators are not working, would be incinerated unless future opportunities arise in collaboration with FIG for composting of such resources”: Will this be classified as International Catering Waste (ICW)? which would then be classed as a Cat I Animal By Product (ABP). If this is the case, then it would need to comply with additional controls for storage, transport, and disposal.	Understood.
IND1 1	I am responding to your request for input to the public consultation on the Environmental Impact Statement (EIS) for the Sea Lion Field Northern Development Area, Phase 1 and 2, as published on your website (both the Non-Technical Summary and full document). I am sending this response to the consultation as a private individual and not on behalf of any organisation. In summary, my conclusion it that this project carries the risk of an accidental oil discharge resulting in severe environmental damage that would undermine the twin pillars of the current prosperity and future economic growth in the Falkland Islands, namely your Fisheries and Tourism industries. The current high GDP per capita of the Falkland	Risk of oil spills are described in the document and the potential impact to tourism and fisheries is considered. Navitas is also required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries and tourism analysis incorporating information from case studies from elsewhere and Falkland Islands specific information) and requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.

Reference	Representation	Navitas response
	Islands and its potential for further growth would be placed at risk in order to develop a new oil sector that will be a transient source of income. Furthermore, in the event of an oil discharge potential damage to the environment in the South Atlantic risks undermining your relationships with countries bordering that ocean. I give details of my analysis below.	
IND1 2	The risk that concerns me most is that of an unconstrained well blow out and oil release, similar to the 2010 Deepwater Horizon incident in the Gulf of Mexico. The industry has learnt from that incident by improving well design to reduce the risk of an unconstrained release of oil and by deploying well capping stacks in established oil producing regions so that a release can be contained quickly. The issue for the Falkland Islands is that as a new oil production region the specialized equipment needed to deal with an incident would need to be transported there after a problem has occurred.	Navitas will ensure industry best practice mitigation measures to minimise the risk of an uncontrolled release to oil. Capping Devices that can be transported by air in the event of an incident are readily available. Analysis of the location and number of capping devices available indicates that a capping device could be deployed to contain a well blow out at the Sea Lion field within 14 days, with 21 days being the worst case expected scenario.
IND1 3	Section 1.7.4.3.1 'Accidental releases of crude oil or MGO to sea offshore' on page 38 of the Non-Technical Summary looks at the above risk but does not go into detail. For the details you need to go to Section 12.1 'Accidental and chronic oil pollution offshore' starting on page 1073 of the full EIS. Table 12.3 indicates that the assumed worst case scenario for the duration of oil release from a well blow out is 21 days, based on the time taken to transport (by air) and deploy a well capping stack (details in Table 12.7). In reality there could be other complicating factors such as the need to extinguish fires on rigs and clear debris from a damaged wellhead so a capping stack can be deployed. Models of the dispersion of the released oil indicate it primarily moving in a Northern direction based on prevailing currents and wind (see for example Figure 12-4 on page 1110). The potential severity of the effect of a well blow out on the human population of the Falkland Islands via its impact on Fisheries and Tourism is considered to be 'High' but when the likelihood of occurrence is taken into account ('Unlikely') the overall risk significance is reduced to 'Moderate' (see Table 12.9). There are two major problems with using the above conclusions in the EIS to support development of the Sea Lion project. First, the GDP per	Navitas is required to assess the potential impact of an oil spill event on the Falklands environment and economy and demonstrate to the Government that it will have sufficient insurance in place to cover this liability should an oil spill event occur. Revenues that would arise from the Sea Lion Phase 1 and 2 development would enable FIG to secure long term economic sustainability and insulate the Islands from the fluctuations in income associated with fishing and tourism.

Reference	Representation	Navitas response
	capital of the Falkland Islands is relatively high by international standards but income from Fisheries and Tourism are significant contributors to this prosperity and its future growth (State of the Falkland Islands Economy 2020). Risking the viability of the two most promising sectors of the economy and the foundation of future prosperity of the Falkland islands to develop a third sector, that will provide only transient income, would be an unwise trade off.	
IND1 4	Second, the projected dispersion of any oil released in a Northern direction due to prevailing currents and wind, and away from the coast of the Falkland Islands, may seem like a positive. However, the countries in the region that the Falkland Islands has key relationships with may not see it that way as the potential environmental impacts in the wider South Atlantic would be severe, damaging international relations.	The oil spill modelling suggests that oil waxlets would disperse and degrade in the water column. Likelihood of oil beaching in detectible quantities is very low. Oil spill modelling indicates that by the time any oil crosses a transboundary line it would likely be undetectable with waxlets small and spread out, see Section 12.1.4.4.2.
IND1 5	In the interest of balance I note that the project design includes a gas injection well and associated gas compression facilities on the FPSO vessel in order to eliminate the routine flaring of produced gas during normal production (Table 1.1). There is therefore no reason to conclude that the carbon intensity of oil production in this project will be high by global standards. I will leave it to others to comment on links between oil production from a specific non OPEC+ project, such as this, and any incremental global oil consumption with associated carbon emissions. The above analysis and views are entirely my own. My conclusion is that this project is not in the long term interest of the people of the Falkland Islands.	Thank you for your comments. Navitas notes the comment that there is no reason to conclude that the carbon intensity of oil production in this project will be high by global standards.
IND2 1	Throughout the entire EIS there is a extreme lack of up to date data gathering and in date evidence provision.	Navitas will provide a table of new data acquired. This will be provided as an appendix to the post consultation EIS.
IND2 2	Table 4.4 Page 118, (Tanker Manoeuvring and Maintaining appropriate positioning) The reported simulation of 30 knots of winds and 3 meter seas show a total lack of understanding and knowledge of the seas and wind conditions often prevailing within the Sealion production area again showing total lack of any real time and up to date research.	Navitas strongly disagrees with this statement. Site specific metocean data collected over a 3 year period alongside the creation of a detailed metocean model drawing upon all the available datasets for the region demonstrates that the metocean conditions at the Sea Lion Field are similar to the UK Central North Sea. This modelling demonstrates that there will be sufficient berthing availability for direct offtake operations to be conducted safely.

Reference	Representation	Navitas response
IND2 3	No new up to date and accurate bird species data is evident for any of the inshore and offshore areas of operation, why was not survey work conducted within the areas by the company to show a commitment to having the correct UpToDate datasets not data from up to 20 years out of date. The environment has changed immensely in the last 10 years and the old data set information is now not current. The bird strike information is from 2015 and totally out of date.	There are new data from the GAP project, specifically tracking data. Regarding occurrence and distribution. The importance of the Patagonian Shelf around the Falkland Islands, as foraging habitat for seabirds and marine mammals and static ocean features that are associated with enhanced primary productivity. Baylis et al. (2019) highlights that for nine-species tracked, the probability of occurrence is highest on the Patagonian Shelf, shelf slope and the Burdwood Bank (Fig 7-53, pg. 360). These findings are similar to the at-sea distribution presented for the same species (White et al. 2002). This is likely to reflect productivity on the Patagonian Shelf, being linked to the Patagonian Shelf, slope and Burdwood Bank (static features, associated with predictable areas of enhanced productivity) (e.g., Fig 7-35, pg. 293). Based on the predictive models, and knowledge of local oceanography, the importance of the Patagonian Shelf around the Falkland Islands is unlikely to have changed over the past 24 years, hence animal distribution is still likely to be associated with the Patagonian Shelf. Peron (2010) is an interesting study, but is associated with oceanic fronts, rather than shelf-break fronts (i.e.., static vs dynamic features). Regarding abundance: The statement specifically relates to the distribution and movements of animals. Data gaps remain for both Falkland Islands breeding species, and migratory visitors. Filling data gaps will improve our understanding of occurrence and distribution.
IND2 4	10.1.6.1.2 page 603 the used data is not up to date and why did the company not carry out a full survey of the sealion field area of operation covering the entire year to get a full and in-depth analyses of all the species that do live and migrate through this area as this part of water in the FOCZ has very rich waters so attracts birds and whales at different times of the year.	Passive acoustic monitoring (PAM) data has been collected at the Sea Lion Field for one year. Whenever vessels associated with Sea Lion Field geotechnical, geophysical, seismic, exploration and appraisal operations have been in the area seabird and marine mammal observers (SMMOs) have been on board and collected data. These datasets, alongside other regional data (e.g. the GAP project with a large investments from both industry and government) have been compiled to inform this environmental impact assessment. It is understood however, that there are data gaps and this has been risk assessed through the EIA and the precautionary principle applied. In the EMMP Navitas has committed to continuing data collection within this

Reference	Representation	Navitas response
		area in order to verify the validity of the impact assessments and inform ongoing management and mitigation.
IND2 5	10.1.6.1.3 page 604 this statement is very wrong that the sooty shearwaters only congregate at the entrance of Berkeley sound these birds use the entire length and breadth of Berkeley sound both in the early morning and evening when departing and returning to their nesting site. So being 10 kilometres from kidney is not a Low impact it is still a high one and all other bird species that are found in Berkeley sound also can be found in all areas, the tankers at anchor will impact highly with all flying bird species while at anchor in the sound, again no study has been conducted by the company on the abundance or areas of travel of birds within Berkeley sound showing yet again a total lack of concern for the wildlife environment.	Thank you for the comment. Observation by a number researchers suggest the greatest loafing abundances are in the region of Couchon and Kidney Island during dawn and dusk. The sensitivity of the receptor is high because they represent a significant proportion of the biogeographic population (i.e. >1 % of the South Atlantic population). Navitas' operations in Berkeley Sound are limited to two anchored LTVs (not tankers) in clearly designated areas and the offtake of their cargo (infrastructure) over a period of 13 months. Navitas welcome the respondent to review the research on the benthic, birdlife, inter-tidal, coastal sensitivity which has been completed by the Company should they so desire.
IND2 6	10.1.6.2.1 page 605 How can the company say that single and multi bird strikes within the sealion field be low when they have not conducted any bird species or abundance of birds across a 12 month time scale, this again shows a total lack of interest or ability to gather the correct data and information for the EIS.	Thank you for the comment. Data are available from SAST surveys and other sources at the Sea Lion Field and in Berkeley Sound. See Chapter 7. The EMMP workshop report (April 2019) notes that workshop attendees (including environmental NGOs, independent experts and FI Fisheries Department) concluded that 'bird strikes caused by light attraction, where they occur tend to be very episodic and thus difficult to detect and monitor. There were no offshore bird strikes during the exploration and appraisal campaigns in the Sea Lion area and very few made during observations by FIFD in brightly-lit squid jigger fellet in waters to the north of the Falkland Islands.' Further surveys using qualified SMMOs will be conducted over 3 years before first oil. Of note, the presence of vessels in Berkeley Sound is limited to two vessels for a total of 13 non-consecutive months and Navitas will also develop a Bird Strike Action Plan as part of the EMMP (Chapter 15).
IND2 7	10.1.6.2.3, 10.1.6.2.4 pages 606,607 again the company has shown that there is no survey data conducted within Berkeley sound that they have not even commissioned an up to date and relevant survey when they knew that there was a big data gap in a very sensitive seabird area, having the impact as low yet again shows total lack of any concern for	Thank you for the comment. Please see Ch7. Bird surveys in Berkeley Sound were conducted in all four seasons over a period of two years. Also note that the activities in Berkeley Sound are limited to two vessels over a period of 13 months. Navitas will also establish a Bird Strike Action Plan that includes Berkeley Sound and the Sea Lion Field.

Reference	Representation	Navitas response
	the wildlife environment of Berkeley sound with endangered species known to use the area intensely when breeding.	
IND2 8	The fishing industry has had very minimal shipping activity within Berkeley sound over the last 10 years which will have resulted in limited light pollution within the seabird breeding times.	Data from FIFD and FIMA would suggest that Berkeley Sound is regularly used by vessels, and Navitas would not consider it to have 'minimal shipping activity'.
IND2 9	10.5.6.1.3 page 703,704 the statement that transiting vessels will have a short duration of noise pollution time when entering Berkeley sound is not correct as once the vessels are anchored they will still emit large amounts of noise from the vessel into the water Colum from generators, also there will be significant noise from traveling launches and other supply vessel going to and from the vessels while they are moored. This additional traffic has not even been mentioned so having a slight as a disturbance is again showing total lack of understanding of the whale types who are present within Berkeley sound a anticipated kbi for Sei whales who are extremely sensitive to any additional noise levels.	When at anchor and not offloading their cargo, the LTVs will maintain one generator to keep the ship's facilities running but otherwise they will be on the anchor, weather vaning, minimising the noise they produce. When offloading they will be fully powered to enable safe operations etc. This will be acknowledged in the revised underwater noise section which will be included in the-post consultation EIS.
IND2 10	Table 10.35 under mitigation/prevention/control there is Project specific none proposed why is the company not actively looking at all additional ways to address these headlines with a project specific proposal thus actually showing that the known noise disturbance is being worked on and reduced not that it is being ignored.	No mitigations are proposed here as the potential impacts from two vessels mooring in Berkeley Sound for up to 13 months have been assessed as 'Low' and 'Very low'
IND2 11	There is no UpToDate data or even any sign of the company attempting to establish the extent of the whale population and species types that will be highly effected within Berkeley sound and also the FICZ FOCZ of operations for the proposed oil field, no study or area information gathering work has been carried out and this part of the EIS feels like an after thought the whale populations and species around the Falkland islands and the waters are increasing and this is widely known (with over 8 years of comprehensive study by Falkland Conservation) but the company has shown little or no regard to this information or even reaching out to get the up to date and relevant information to actually make any risk assessment and mitigation works for the whale and dolphin populations.	Thank you for the comment. Please note: Navitas (previously POEPL) invested significantly in data gathering to inform the environmental baseline of the Sea Lion Field and inshore areas relevant to the proposed development. The Hipsey report gathered Sea Lion specific data over a 14-year period. Please note, given the limited operations now proposed in Berkeley Sound (i.e. no inshore transfer and only two vessels anchored for a non-consecutive period of 13 months) the EMMP workshop screened out the need for further Berkeley Sound Marine Mammal data. The baseline information was up to date at the time of writing and will be updated further as part of the post consultation submission process. Navitas is committed to further data collection - see Chapter 15. The FIG 2016 guidance states that the presence of justifiable data gaps does not

Reference	Representation	Navitas response
		make an EIS unfit-for-purpose, as long as these are acknowledged and explained. When carrying out the risk assessment data gaps can be taken into account and within the EIS are factored into the precautionary approach and the confidence ratings within the EIS.
IND2 12	I fully support and agree with all of the Falkland conservation EIS reply statement, the entire Navitas EIS is not fit for purpose.	Navitas strongly disagrees with this statement. We refer the reader to the responses to Falklands Conversation (FC) comments.
IND3 1	The EIS indicates that in the majority of the oil spill scenarios considered the impact on squid and the associated fisheries would be "Low" or "Very Low", with the exception of Scenario 1, where the impact is assessed as "Moderate". I believe this is an underestimation of the sensitivity of the squid species that inhabit Falklands waters. Please find my detailed comments below: 1. Baseline biological information is incomplete or inaccurate Sections 7.4.4.2.2.2 and 7.4.4.2.3.2. Table 7.9. Argentine shortfin squid: This table contains inaccurate information regarding the presence of this species in the Northern Slope habitat zone, namely it characterises this species as "Absent" in Winter, which is incorrect. The annual Falkland Islands Fisheries Department groundfish survey reports from July surveys show that this species persists throughout the region. Moreover, the individuals that are found during these periods are juveniles, which are more susceptible to possible environmental impacts of the project. Recent research has also highlighted the importance of these seemingly small assemblages of squid which help maintain the species' flexibility and adaptivity to adverse environmental conditions (Chemshirova et al., 2023). The omission of this information leads to the underestimation of importance of these individuals and thus subsequently an underestimation of the possible impact of the development on this commercial species, valuable to the Falkland Islands fisheries	Thank you for the comment. Navitas will amend the text with new information from Chemshirova et al., (2023). Their abundances are likely to be low during that period. Arkhipkin et al (2012), based on data from 13,044 commercial bottom and pelagic trawls between 2000 and 2010 mainly within the FCMFZ, and from 1272 research trawls taken between 1999 and 2011 reports that they are 'practically absent from the Patagonian Shelf and slope'. Also note that the assessment is based on a combination of the sensitivity of the receptor, severity of the effect and the likelihood of occurrence. Which in the case of oil spill is unlikely. Please see Chapter 8 on methodology. Navitas is required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval, this assessment was issued to FIG in August. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries analysis incorporating information from case studies from elsewhere and Falkland Islands specific information) and requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.
IND3 2	Section 7.4.4.3 This section states that a summary of the ecology of each species is provided - "their seasonal abundances in relation to the Berkeley Sound Area, their seasonal spawning migrations and their principal diet." However, in the relevant section (7.4.4.3.2.1) when discussing "Loligo (Patagonian long-finned squid)" only superficial	Thank you for the comment. Navitas will update the text where relevant. The Büring et al., 2024 and Jones et al 2023 papers were not available at the time of writing.

Reference	Representation	Navitas response
	mention of “zooplankton” is made with regards to diet, despite extensive research on the topic being widely available (Büring et al., 2022; Jones et al., 2023). The summary also omits recent literature that highlights the importance of D. gahi as a keystone species in the Falkland Islands ecosystem (van der Grient, 2023; Büring et al., 2024). The lack of information presented in this section leads to further misconceptions that result in the environmental impact of the development being underestimated.	
IND3 3	2. Misrepresentation of fishing activity relating to jigging and trawling vessels Section 7.7.3.1.1 The statement made here: “However, further analysis of Vessel Monitoring System (VMS) data indicates that most of the vessels reporting catch in this square were in fact fishing elsewhere.” There doesn’t seem to be any evidence presented to support this. Furthermore, whilst the subsequent sentence acknowledges the variability of Illex catches and the connection between high catches in the relevant grid square and years of high Illex abundance, the conclusion is drawn that “the area is rarely fished”. This is an erroneous conclusion, one of the key characteristics of the Illex fishery is the inter-annual fluctuations frequently associated with environmental drivers (Chemshirova et al., 2021). The current impact assessment subsequently minimises the possible effects the development may have by completely ruling out the possibility of the fishery utilising the same areas simply on the basis of population fluctuations.	Thank you for the comment. Navitas has also analysed AIS data and it is clear that the Illex fleet fish on the shelf break and sometimes report either their midday or midnight positions in the relevant grid square XFAK but do not fish in there. The AIS data corroborates the VMS data. Navitas is required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval, this assessment was issued to FIG in August. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries and tourism analysis incorporating information from case studies from elsewhere and Falkland Islands specific information) and requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.
IND3 4	3. Underwater noise - Offshore - omissions of recent relevant literature: Section 10.4.4.3.1 This section aims to assess the effect of the noise generated by the project on the invertebrates with a focus on squid. However, recent and relevant research on the topic is omitted. Recent literature investigating the effect of anthropogenic noise in the range of 20 - 1000 Hz shows negative effects on Doryteuthis pealeii feeding behaviour (Jones et al., 2021). The proposed project’s estimated noise level is <1000 Hz, this falls within the range investigated by the previously cited study. Furthermore, this section states “...commercially exploitable aggregations of squid are not known to occur within the area	Thank you for your comment, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. These sections are also being updated with relevant citations suggested during the public consultation. See FIFD 54.

Reference	Representation	Navitas response
	of the Sea Lion Field…", this also serves to underestimate the impact of the development as addressed in point 2 above.	
IND3 5	4. Ecotoxicity tests not performed on cephalopods and effects of contamination not fully considered. Section 12.1.4.1.1.1 and Section 12.1.4.2.3.2 The ecotoxicity tests of the crude oil only investigated the effects on embryonic zebrafish. This is insufficient evidence for potential impact on squid eggs, which differ significantly from a freshwater fish. Additionally, there were no tests performed on any of the paralarval/juvenile stages which are more vulnerable than egg masses or adults for two reasons: a) they are not as mobile as adults and often subject to current transport; and b) previous studies on O. pallidus showed that newly hatched animals were more sensitive to the toxic effects of crude oil (Long & Holdway 2001). Overall, the omission of this information and lack of testing further leads to the inaccurate assumption that crude oil would have negligible effect on newly hatched individuals, again underestimating the risk and impact of the development. Furthermore, there is an omission of research that clearly shows that molluscs including cephalopods are more susceptible to polycyclic aromatic hydrocarbons due to their reduced ability to metabolise these compounds, thus leading to higher likelihood of bioaccumulation compared with other organisms (Lacoue-Labarthe et al., 2016; Rodrigo & Costa, 2017). This further serves to minimise the negative impact that the potential development may have on squid populations.	Thank you for the comments. These are noted. See response to Ind10 1. An oil spill is an unplanned risk and impact that could be caused by multiple stakeholders - not just the oil industry. Additional data acquisition will not change mitigation, but may help better predict effects of a spill event.Navitas would consider participating in research effort to explore oil spill effect on squid egg masses. Ecotoxicity tests using Sea Lion crude were carried out on zebra fish eggs at the CEDRE laboratory. It was not possible to transport and import Falkland Islands squid eggs to France and maintain their integrity to enable lab testing. The Cedre report notes that 'Concerning the toxicity of the oil on fish eggs, no acute toxicity was observed. A slight subacute toxicity (larval malformation <3%) was noted for the highest concentrations (between 29% and 100% of the water saturated with PAHs).' The concentrations employed in the lab testing are highly precautionary being far greater than the concentrations that would be expected in a spill event, and the crude would form solid masses on contact with the sea-water, limiting potential for contamination. While not fully understood, the current thinking is that the major spawning grounds are on the Eastern sea-board, whilst it is also acknowledged that loligo may spawn all round the Falklands: it is important to note that in a spill event the modelling suggests that none of the oil reaches these areas. In the worst deterministic case the modelling suggests that oil might reach the northern coast in extremely low concentrations.
IND3 6	5. Incomplete information on D. gahi life span Section 12.1.4.2.3 This section makes the case for the life span of all squid being only one year, thus any effects of a spill would be minimal. This is inaccurate. Recent research found that a proportion of the population lives longer than one year (Jones et al., 2019). This means that any adverse effects could be magnified across time and space. This again leads to the incorrect conclusion that the impact of the development on the squid population in the region would be minimal.	Thank you for the comment. Navitas will update the text stating this; however, it should be noted that the majority of loligo only live for ~ one year. The Jones et al (2019) paper is on super bull males. The results suggest that superbulls provide temporal connectivity and arise through phenotypic plasticity, likely providing connectivity (between cohorts) as a side effect of body shape and size rather than a genetically selected advantage. Please note that they represent a small proportion of the population.

Reference	Representation	Navitas response
IND3 7	6. Underestimation the wider effect on squid population dynamics Section 12.1.4.2.3 This section does state that squid are sensitive to environmental conditions, but omits the fact that whilst the general short life span of squid (see point 5) may limit bioaccumulation, squid populations can be very volatile. Therefore, once knocked out of equilibrium there is a risk of the population entering a boom and bust cycle, which can be very damaging for squid fisheries in the long term (Rodhouse 2008). Again, I believe this section underestimates the extent of the impact of this development by not considering or presenting key aspects of squid biology.	Thank you for the comment. Considering the nature of the oil and the likelihood of a large spill / blow out Navitas has been precautionary. Navitas is required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval, this assessment was issued to FIG in August. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries and tourism analysis incorporating information from case studies from elsewhere and Falkland Islands specific information) and requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.
IND3 8	7. Omission of cephalopod biology and recent research on the effects of oil contaminants on cephalopods Section 12.1.4.2.3 All squid species perform vertical diel migrations, this makes them more susceptible to the adverse effects of contaminants from an oil spill (Sutton et al, 2022). Furthermore, due to these migrations, they are more likely vectors of the transfer of said contaminants (Arkhipkin, 2013). Previous work on investigation of oil spill contaminants has shown that the exposure of squid to these contaminants has been previously underestimated (Romero et al., 2020). Additionally, the duration of the exposure of said contaminants was also longer than previously expected (Romero et al., 2020). Finally, this again contributes to the overall underestimation of the potential risks associated with the proposed development.	Thank you for the comment. Both these papers are the subject of Macondo oil spill which is very light non-viscous volatile crude which is in great contrast to the Sea Lion crude. The latter is buoyant and will be solid due it is pour point. The modelling also shows that it will be carried in a north easterly direction for the most frequent metocean conditions. Navitas has been precautionary in the risk assessment. All matters to do with fisheries have been assessed as significant. Navitas is required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval, this assessment was issued to FIG in August. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries analysis incorporating information from case studies from elsewhere and Falkland Islands specific information) and requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.
IND3 9	8. No commitment of investigation of D. gahi spawning grounds. Section 1.6.1.1.2 Identifies the lack of information on D. gahi spawning grounds as a “key data gap”. Section 7.2.4.1 it is stated that “the prevalence of these bottom-attached masses remains unclear”. However, there is no evident commitment or attempt made to investigate this further, beyond some of the shallow surveys near Berkley Sound. This is	There is no inshore transfer of oil in the current project proposal: the activity in and nearshore is restricted to vessels transiting between Stanley and Berkeley Sound and the Sea Lion field. In addition there will be two LTVs in Berkeley Sound for a duration of 13 months. and in the unlikely event of an oil spill the modelling undertaken determines that very little oil arising from an offshore spill would reach the near shore. Navitas

Reference	Representation	Navitas response
	insufficient, and contributes to the prolonged underestimation of the impact of this development on the squid populations in the Falkland Islands.	discussed the possibility of testing loligo eggs but it was not possible to keep them alive and get them to the CEDRE laboratory in France. Navitas has been precautionary in the risk assessment. Please also see response to IND 3 10.
IND3 10	Recommendations Based on the analysis described above, I do not recommend the commencement of the project. Further studies should include establishing up-to-date and baselines for the squid populations of the region; obtaining accurate locations of the possible spawning sites for D. gahi and performing ecotoxicity tests on squid egg masses, paralarvae and juveniles.	The industry committed through GAP to support research into loligo spawning grounds. At that time Premier was intending on crude oil transfer in Berkeley Sound; this is no longer the case. An oil spill is an unplanned risk and impact that could be caused by multiple stakeholders - not just the oil industry. Navitas would consider participating in research effort to explore oil spill effect on squid egg masses. Ecotoxicity tests using Sea Lion crude were carried out on zebra fish eggs at the CEDRE laboratory. It was not possible to transport and import Falkland Islands squid eggs to France and maintain their integrity to enable lab testing. Additional data acquisition will not change mitigation, but may help better predict effects of a spill event. Navitas is required to assess oil spill financial liability and provide this as a separate regulatory submission to FIG for review and approval, this assessment was issued to FIG in August. This includes assessment of the worst case impact on the Falkland Islands environment and economy (including specific fisheries and tourism analysis incorporating information from case studies from elsewhere and Falkland Islands specific information) and requires Navitas to demonstrate that it will have sufficient insurance in place to cover the assessed worst case cost of oil spill response and clean up and the financial impact on broader industry and the Islands economy.
IND3 11	Conclusion In conclusion, the proposed oil drilling project may have a significant effect on local cephalopod populations. I urge the Falkland Islands Government and the Members of the Legislative Assembly to carefully consider these factors before making a final decision.	The Sea Lion Field is not a significant area of cephalopod migration - as such, fishing in the area is minimal. Navitas will provide additional clarity on the location of the fishery in relation to the Sea Lion field in the post consultation EIS. As detailed in the EIS an oil spill event would be highly unlikely and is heavily mitigated against. Should such an event occur Navitas' Oil Spill Financial Liability Assessment (issued to FIG in August 2024) details the coverage that Navitas will have in place to compensate stakeholders affected by a spill.

Reference	Representation	Navitas response
		Laboratory testing has shown that Sea Lion crude has prolonged buoyancy, low solubility, low polycyclic aromatic content and relatively low toxicity which would likely limit the biological effect on squid. Biological recovery is likely to occur in one year. The Financial Liability Assessment notes however that a spill event would likely have a marketing impact, such that stakeholder compensation would be required.
IND4 1	There will be significant carbon emissions as a result of the burning of oil produced. There is little commitment to offsetting these emissions. FIG have frequently pushed their environmental credentials and a desire for net zero but appear happy to contribute significant amounts of CO2 to the atmosphere without proper offsetting in place.	The subject of Emissions is extensively detailed in Section 10.9 of the EIS. Navitas remains committed to exploring opportunities to further reduce its emissions; an example of this is the Emissions Reduction Action Plan (ERAP) for the Floating Production Storage Offtake (FPSO) during the Front End Engineering and Design (FEED) project and will continue throughout the life-cycle of the Sea Lion Field. Carbon and biodiversity offsetting opportunities require further evaluation and research to define the level of offsetting that can be achieved locally. Navitas is committed to complying with FIG's offsetting guidelines and policies. It would not be possible for Navitas to control the use of the product once it has been sold or monitor and manage emissions, thus the end user's emissions will be their responsibility to monitor, manage and offset; their scope 1 & 2 and will be considered our scope 3. A conservative assumption of Navitas' Scope 3 sold emissions (all being combusted) were included in the EIS.
IND4 2	There is likely to be significant impacts on wildlife and there is still a lot of data missing on this (EIS even acknowledges there are data gaps) - imo far more robust data should be in place. Falkland's tourism and lifestyle is very much based around wildlife. Risking this by potentially going ahead without full data in place is very concerning.	Please note that under FIG's guidance (FIG, 2016) the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.
IND4 3	Going ahead with a huge oil development such as this appears at odds with FIGs commitments to net zero. Indeed it is likely to lead to the Falkland Islands having the highest CO2 emissions per head anywhere in	Thank you for your comment. This is noted. However, it is not for Navitas to comment on FIG policy and would refer this comment to FIG.

Reference	Representation	Navitas response
	the world (we cannot and should not wash our hands of the emissions created once the oil has been exported)	
IND4 4	There is little information on how the oil will be decommissioned if/when it becomes uneconomical.	Falkland Islands legislation requires Navitas to fund full decommissioning and to ensure that all infrastructure is designed so that it can be fully decommissioned. FIG will undertake assurance to ensure that adequate funds for decommissioning are in place throughout life of field. Please also refer to DGN 3.
IND4 5	Although spill risks are mentioned there is little information on how specific species will be affected	Note there are three chapters on oil spills and details on species affected, see sections 12.1, 12.2 & 12.3.
IND4 6	Impacts on cetaceans in Falklands waters have not been fully explored. Much of the data is inadequate and the latest information has not been used/taken into account as far as I can see (for example impact of noise on cetaceans or entanglement issues do not appear to have been fully explored)	Underwater noise impacts on cetaceans inshore and offshore are covered in section 10.4 and 10.5. . The lines that will be placed in the water for the Sea Lion project include flowlines, risers and anchor chains. All of these are substantial and solid pieces of equipment, which Navitas believe poses a very low risk of entanglement to marine mammals. However, it is recognised that whale entanglement in anchor chains does occur, so a Whale Entanglement Management Plan will be put in place. Further detail on entanglement will be included in section 10.11. See also FC 82, FC 88).
IND4 7	The EIS identifies over 30% of negative impacts as moderate or upper moderate - this includes atmospheric emissions (which in the middle of a climate crisis to me seems completely unacceptable - especially with no commitment to offsetting as above), collision with marine mammals (which is an unacceptable risk imo) and introduction of invasive species (we have seen the impact invasive species have had on many islands and how they have decimated seabirds. We have also seen the impact earwigs have had in Stanley - do we really want to have a moderate risk of this occurring?). It also lists competition for freshwater resources as upper moderate - with a drying climate and water scarcity likely to get worse this is deeply concerning.	Navitas has been very precautionary in all the impact and risk assessments. Risk of collision with marine mammals is not a risk specific to the oil industry but is present in relation to all marine traffic. Navitas has committed to vessel speeds below those recommended by guidance in order to minimise the risk to as low as reasonably practicable (Section 10.11.7). The impact for invasive species introduction is rated highly because of the impact that would arise if it were to actually occur despite all the preventative measures. Competition for freshwater is rated highly currently as the assessment has conservatively assumed that the planned increases to freshwater catchment and treatment will not be in place. If FIG makes these planned investments then the rating for this impact will decrease. In the event of a water shortage the project would be lowest priority for freshwater - community and other industry needs would come first.

Reference	Representation	Navitas response
IND4 8	The table (page 32) mentions competition for accommodation as an "upper moderate" risk. Housing in Stanley is already in short supply and prices high. There is a very real risk that people will be pushed into poverty by increasing rents (there are already a number of examples of rents rising due to people anticipating increased demand - houses are being bought by big companies with the intention of renting to oil for huge sums). As well as potential increase in poverty there is the very real risk of homelessness/people leaving the islands due to lack of affordable accommodation. This has not been addressed in the EIS beyond a brief mention in the table.	Sea Lion Phase 1 and 2 requirements and housing supply will be discussed further in the Socio-economic impact assessment. Navitas is committed to provision of increased housing to meet Sea Lion Phase 1 and 2 demand and to working closely with FIG to assist in the monitoring and management of this potential adverse impact, which extends beyond the potential Sea Lion Phase 1 and 2 development, and is a feature of Falkland Islands economic growth generally.
IND5 1	In reviewing the presented Environmental Impact Statement (EIS), several fundamental issues emerge that call into question the adequacy of the document for its intended purpose: 1. The EIS is Not Fit for Purpose: The current EIS fails to meet the necessary standards for a thorough and reliable assessment of the proposed project's environmental impacts. It lacks the comprehensive detail and rigor required to make informed decisions about the project's viability and its long-term effects on the environment. The gaps and deficiencies in the document suggest that it is not fit for purpose and requires significant revision.	The EIS meets international best practice and with regards to gaps it is important to note that under FIG's guidance (FIG, 2016), the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.
IND5 2	2. Carbon Emissions and Lack of Commitment to Offsetting: The EIS inadequately addresses the project's contribution to carbon emissions and fails to present a clear commitment to offsetting these emissions. Given the global urgency of combating climate change, the absence of a robust carbon management and offsetting plan is a critical oversight. The project must include specific targets and strategies for reducing and offsetting carbon emissions to align with international climate goals and to be consistent with FIG Guidance.	The subject of Emissions is extensively detailed in Section 10.9 of the EIS. Navitas are committed to exploring opportunities to further reduce emissions and to offsetting. Carbon offsetting opportunities require further evaluation and research to define the level of offsetting that can be achieved locally. Offsetting approach is being confirmed with FIG and will be consistent with FIG legislation, policy and guidance.
IND5 3	3. Impacts on Wildlife and Data Gaps: The EIS presents significant data gaps concerning the potential impacts on local wildlife. These gaps and outdated data hinder the ability to assess how the project may affect vulnerable and endangered species and ecosystems. The document lacks	Thank you for the comment. There are lots of examples of recent data including tracking data from the GAP project and indeed more recently. New references will be added to the text and as with the response to the comment IND5 ,1 under FIG's guidance (FIG, 2016) the applicant should

Reference	Representation	Navitas response
	a comprehensive analysis of the risks to wildlife, particularly concerning habitat disruption, pollution, protected areas. Addressing these data gaps through further research and ongoing monitoring is crucial for protecting biodiversity. Most of the data is over 10 years old. In example, I would like to highlight the lack of current data regarding Southern right whales, species that have been seen increasingly since 2017 and occurs persistently over the years, showing a clear use of Falklands Islands Waters. No current data published has been included in the EIS.	not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.
IND5 4	4. Decommissioning and Spill Risks: The EIS inadequately addresses the risks associated with decommissioning and potential spills. A detailed and enforceable decommissioning plan must be included, along with a robust spill response strategy. Historical evidence indicates that spills can cause long-lasting damage to ecosystems, and the current EIS does not provide sufficient assurances that such risks will be effectively managed and the responsibility should not be passed to Falkland Islands Government.	Decommissioning is subject to a separate EIS. Navitas is legally obliged to decommission offshore infrastructure. See DGN 3. Spills are covered in sections 12.1, 12.2 and 12.3. Risks are managed in accordance with accepted industry best practice. Preliminary Oil Pollution Emergency Plans have been submitted to FIG along with a document that assesses potential financial liability associated with oil spill events (including the potential impact on fishing and tourism) and demonstrates that Navitas will have sufficient funding/insurance cover in place to cover liability arising. Navitas recognises that the Polluter Pays Principle will be enforced, as such liability arising will not fall to FIG.
IND5 5	5. Incomplete Legal Framework for Environmental Governance: In addition to the concerns above; the existing legal framework is insufficient to ensure effective environmental governance in the context of this project. Current regulations do not provide adequate safeguards or enforcement mechanisms to protect the environment from potential harm. Strengthening the legal framework is essential to ensure that environmental risks are properly managed and mitigated.	Navitas has submitted the Field Development Plan (FDP) and Environmental Impact Statement (EIS) in accordance with FIG's current legislative framework. Navitas continues to work with FIG and its key contractors to ensure that its arrangements are aligned with industry best practice and FIG's planned changes to legislation. Navitas expects that FIG will comment separately on the EIS public consultation representations which cover FIG's Oil Readiness and planned legislation.
IND5 6	In summary, the presented EIS is inadequate and requires substantial revisions to address its deficiencies. The document falls short in its assessment of environmental impacts, lacks alignment with both local and international environmental legislation, and fails to provide sufficient safeguards against potential risks. A more rigorous, detailed,	ExCo 118/24 confirmed that the EIS submitted for public consultation was legislatively compliant. The document also meets international and more specifically UK best practice.

Reference	Representation	Navitas response
	and legally compliant EIS is essential for responsible decision-making and for the protection of the environment in the Falkland Islands.	
IND6 1	My knowledge of the oil industry is limited, but after reading the EIS and spending some time researching, slightly more knowledgeable than a few weeks ago. I read the non-technical EIS summary and found it a comprehensive risk assessment profile. Historically oil around the Falkland Islands could be thought of as 'political,' oil has featured in strategies and decisions made by British and Argentine governments since at least the 1960s, swinging from wanting/keeping sovereignty of the Falkland Islands to war; always simmering below the surface. This hampered oil development, but now, with advanced technology and political changes, the time is right. The fishing industry, despite fears, has not wiped out our marine species; in fact, whales are thriving. Once the platforms and measures for species protection is in place I doubt there will be any difference than the present fishing fleet effect, regarding movements, light at sea at night, or with careful management, noise. There always will be damage/change, as there is with anything humans undertake. Species adapt to the environment. Is FIG sufficiently prepared with essential services - electricity, water, sewage, waste management and accommodation? I have not heard or read anything that gives me confidence that FIG is prepared. I also think sending ash/waste to landfill in UK, or anywhere else, is unacceptable, a facility should be built on the islands. Offsets usually refer to like for like [replanting a forest or replacing natural features]. The Falkland Islands are different in natural features, the replacement of a stand of rock, part of a stone run, or beach tidy would be superficial, practicality is needed. I hope the internal fund will go toward these services. It will be interesting to learn how emissions can be offset.	Thank you for your comments. In answer to your questions: 1. Navitas is working closely with FIG and the local business community to ensure that all stakeholders are prepared for the Sea Lion Development. This public and private dialogue will continue throughout the planning and execution stages of the development. 2. In August 2024 Navitas submitted its Carbon & Biodiversity Offsetting Fund Strategy to FIG. Once the strategy is agreed by all parties application for local and international offsetting projects will be welcomed. 3. Sea Lion crude will be sold on the open international market (subject to trade embargoes, international sanctions etc.). 4. Navitas is an ethical company, the depth and detail of the Environmental Impact Statement is a clear example of this. Further information on Navitas can be gained on the company website: www.nativaspet.com. 5. Navitas is a publicly traded company and is subject to clear legislative rules and investment / investor requirements. 6. As above, in the response to question 5, Navitas is publicly traded. The Sea Lion Field Carbon & Biodiversity Offsetting Fund will illustrate the company's commitment to the energy transition. 7. Navitas is unable to comment on the opportunities that FIG will be able to develop as a consequence of the Sea Lion revenues and this question would best be answered by FIG. 8. Navitas is unable to comment on the opportunities that FIG will be able to develop as a consequence of the Sea Lion revenues and this question would best be answered by FIG.

Reference	Representation	Navitas response
	How much say will FIG have in what happens to 'our' oil, will they have any influence. Falkland Islanders now have the right to self-determination, to freely pursue economic development and freely dispose of natural wealth and resources, written in our Constitution and endorsed by the UN. Yet…I expect, apart from a percentage per barrel and tax revenue FIG will not have any influence in a wider sense; probably wishful thinking for anything more and this development will go the way of other bonanzas. Is Navitas Petroleum an ethical company? How do/did Navitas view/choose their investors for the Sea Lion/Rockhopper development? Israeli investors are eager for access to oil and gas assets. It would be abhorrent morally to humanity if the riches from our 'oil' filtered into weaponry and contributed to the genocide and wars in the Middle East. It would be more ethical if part of our fortune be put into resourcing and investing in technologies working for cleaner energy for that distant future when oil is no longer needed. The Falkland Islands have a small population, we will per capita be extraordinarily rich in the short term, but what of the future? Where is the Falkland Islands going- will we just go with the flow or have an ambitious goal and steer for it? I worry we might flounder. There is going to be many practical, social, political, and ethical issues to debate in the next few years. I support this development but would like to know what is envisioned for our long-term future by FIG, HMG and Navitas.	

Reference	Representation	Navitas response
IND7 1	Overview The Sea Lion development proposed by Navitas Petroleum Development & Production Ltd within their 2024 EIS is, in most respects, a further iteration of the Sea Lion development concept that has been underway since 2011. Although further work has been carried out optimising the understanding of the geological aspects, and on the technical aspects of the development, the major features of the project appear substantially unchanged to several previous iterations of the FPSO-based development, and in particular the most recent Sea Lion project proposed by Premier Oil within their EIS, accepted by FIG in 2020.	Agreed, the project is substantially unchanged with some improvements.
IND7 2	Project design and operation The project proposal appears substantially similar at a technical level to the previous projects, with a small number of material technical changes such as the change to well completions and the change to a repurposed FPSO rather than a new build. I do not have any material observations on these changes, and do not believe they will substantially impact either the planned environmental impacts of the project, or the risks of an unplanned major impact arising. Some choices made (such as using a repurposed FPSO) may arguably reduce the overall environmental impact of the project by reducing the lifecycle footprint, and as long as critical technical and safety requirements are met, these do not appear to raise any specific concerns and are aligned with established industry practice elsewhere. Detailed technical and safety aspects are for FIG's external technical and safety advisers to review within the field development plan and relevant safety submissions, and are beyond the scope of the EIS consultation.	Agreed, using a repurposed FPSO does reduce environmental impacts overall.
IND7 3	Data and risk Some concerns have been expressed that environmental data used in the EIA process is outdated and that insufficient data has been gathered in recent years. FIG and oil companies jointly funded two projects of gap analysis and data gathering over a period of several years. It is always true that more data could be gathered, but FIG and stakeholders should aim to take a pragmatic approach to determining what is necessary versus what might be desirable, and in particular, make some judgement	Agreed - note FIG EIA Guidance re data gaps (sections 3.13 and 3.18 in particular).

Reference	Representation	Navitas response
	on whether further data, or improving on identified uncertainties, would be likely to have a material impact on any decision to proceed with the project. My view is that it would not be likely to impact that decision, because a precautionary approach has generally been taken where there are uncertainties.	
IND7 4	Planned environmental impacts – and the bigger picture The planned impacts of the project appear to be broadly aligned with previous iterations of the project. If the project is delivered using good oilfield practice then the planned impacts over the life of the project appear acceptable and in line both with previous iterations of the development, and with the impact that might be expected from this type of project delivered elsewhere. Global climate change concerns and carbon emissions are of course a developing issue for all projects of this type, and managing mankind's impact on our planet will remain a major challenge for decades. In considering this, it is important to recognise that global emissions from hydrocarbons are produced by global oil and gas consumption which stems from the demand for, and usage of, the commodities. In common with most mobile and globally traded commodities, consumption levels are not particularly affected by whether specific production opportunities in specific locations are pursued. Reducing emissions is therefore ultimately a function of reducing consumption, which in turn will reduce production. It is also important to recognise that the transition to a low-carbon future will necessarily take time (likely to be 20 years or more) and that regardless of how much carbon sits within any future energy landscape, it is more than likely that manufacturing industry will still require substantial volumes of oil and gas into the distant future. The notion of "Just Stop Oil" is therefore an idealistic and impractical concept at every level, and none of the proponents of such an approach are able to articulate a credible alternative.	Thank you for your comments. Navitas confirms that it is working within FIG's legislative framework (as illustrated by the Environmental Impact Statement process). This is closely aligned to the UK regulatory framework which is considered world leading. In addition Navitas is working closely with leading international contractors all of whom have significant industry experience and most of whom are public traded and consequently openly demonstrate their environmental social governance (ESG) policies.

Reference	Representation	Navitas response
	In the event that the Falkland Islands declined to provide consent to the project's Field Development Plan (for any reason), that decision would not inherently mean that any less oil will be used worldwide, or that any less carbon would be produced into the global atmosphere. It simply means that demand for the commodity will be satisfied from new supply somewhere else, which might produce either more or less carbon emissions depending on the nature of that project. It simply cannot be predicted with any reliability. The impacts on individual national statistics such as the carbon emissions per capita of the Falkland Islands can be highly misrepresented, and should therefore be discounted. Using per-capita metrics, we would be proposing to ban sheep farming in the Falkland Islands because the emissions of sheep methane per capita are probably easily the highest of any country in the world. Decarbonisation is a whole-planet problem which must eventually have a whole-planet solution to reduce demand and deliver alternative technologies wherever possible. The Falkland Islands cannot meaningfully influence either of those things with a decision on a single project. This means that the principal role of the Falkland Islands is to ensure that any projects that are operated within its jurisdiction meet criteria such as: • The project meets normal industry expectations for a responsible operator working in a developed country, and is delivered using recognised best practice and best available technology to minimise planned emissions and maximise efficiency and safety • The project is regulated to a high standard by the host Government throughout its life including ensuring proper decommissioning	
IND7 5	Unplanned environmental impacts Significant unplanned environmental impacts mainly arise from the risk of a major accident of some sort, and the EIS sets out a number of such cases which appear to have been chosen and described adequately.	Thank you for your comment. This is noted and agreed.

Reference	Representation	Navitas response
	Managing unplanned impacts is very much a matter of prevention, by reducing all material risks to as low as reasonably practicable (ALARP).	
IND7 6	Human and economic impact The impact on the population of the Falkland Islands and the nature of economic opportunities are both fairly well understood. There is a natural alignment between delivering an efficient project by not deploying unnecessary people and resources to a remote project location, and minimising adverse socio-economic impacts on the Falkland Islands, and it appears that the project proponents intend to continue to operate in this way. In simple terms, nothing will be deployed here if it is not necessary for the project. Previous rounds of exploration activity have been shown to be quite manageable for the Falkland Islands, with modest impacts but considerable opportunities, and the onshore impacts of a single development as proposed in this EIS is likely to be "exploration plus" – a little more of everything, and for a longer period, but still manageable. Additional concurrent phases of development activity, not described in this EIS, may require more careful consideration in the event that any arise. The overall economic impact on the Falkland Islands will be generally extremely positive. The author is aware that a detailed economic model was compiled by FIG and the previous operator for past project iterations, and it is assumed that this has been updated. FIG has an extensive wish list for capital investment and aside from offsetting commitments that the project sponsor may make, developing a new industry would allow FIG to invest substantially in moving the Falkland Islands further along the path towards net zero and energy independence as a country.	Thank you for your comments. Navitas confirms that the project has been designed to minimize adverse socio-economic impacts and optimise the benefits for the Falkland Islands stakeholders. A separate Socio-Economic Impact Assessment undertaken by an independent UK based consultancy with recent relevant experience in the Falkland Islands will be issued to FIG in Q4. Navitas is unable to comment on the opportunities that FIG will be able to develop as a consequence of the Sea Lion revenues.
IND7 7	Decommissioning and response planning Ensuring thorough, safe, and financed decommissioning at the end of project life is essential to protect the Falkland Islands. It is normal for decommissioning at this point to be in the form of a broad commitment rather than detailed plans which can only be designed closer to end of field life, so the content of the EIS appears acceptable in this regard, and	Thank you for your comment.

Reference	Representation	Navitas response
	the applicant's commitments to remove all parts of the development above the sea bed are in line with expectations. Response measures to unplanned events, that will in due course be set out in the oil spill contingency plan / oil pollution emergency plan will also need careful review, alongside the financial capacity arrangements to support this response.	
IND7 8	Regulatory framework It is unclear from the EIS what the current status is of revised legislative provisions to bring in the UK's 2015 Safety Case provisions, and the new Environment Case legislation. Although there is mention of the ongoing work in section 3.1.7.3.1, references within the EIS document only appear to be to existing/legacy legislative provisions with no indication as to the expected date of changes coming into force, nor of any expected transitional provisions to new legislation when it emerges. It is assumed that the Sea Lion project is intended and designed to comply with forthcoming legislative changes, as these should by now be well understood, with detailed legislative drafting having commenced several years ago following policy approval. Completing the update work on the Offshore Minerals Ordinance 1994 (and other related legislative provisions) remains essential, as does maintaining sufficient expertise within FIG to ensure robust and effective regulation throughout the project. It is noted that some earlier identified legislative priorities such as updating the Conservation of Wildlife & Nature Ordinance 1999 appear not to have progressed, and other public information suggests that this Ordinance has been deprioritised in favour of unrelated environmental legislation. The effect of this should be clearly understood by decision-makers prior to granting any final production consent. The EIS suggests that the relevant licensing legislation for the project is the Offshore Petroleum (Licensing) Regulations 1995. In fact the majority, perhaps all, of the Sea Lion development sits within Production	Thank you for your comment. This is noted and Navitas shall update the EIS text to clarify the licensing regulations that apply. Navitas has submitted the Field Development Plan (FDP) and Environmental Impact Statement (EIS) in accordance with FIG's current legislative framework. Navitas continues to work with FIG and its key contractors to ensure that its arrangements are aligned with industry best practice and FIG's planned changes to legislation. Navitas expects that FIG will comment separately on the EIS public consultation representations which cover FIG's Oil Readiness and planned legislation.

Reference	Representation	Navitas response
	Licence PL032, which was issued under the Offshore Petroleum (Licensing) Regulations 2000. This is a separate (if substantially similar) piece of legislation, not an amendment to the 1995 regulations as suggested. The two sets of regulations provide for different model clauses, fees, licence terms and other key differences, and co-exist in law to regulate different production licences. However, this error is administrative and not particularly material to the EIS content.	
IND7 9	Summary The project set out in the Navitas Sea Lion EIS is substantially similar to that previously accepted by Executive Council in 2020, with some iterative design changes that are relatively minor in terms of the overall project. The function of an EIS is to describe the impact of a project on the environment should it go ahead, so that this impact can be taken into account in making a final determination on the development plan that the applicant must also submit to gain consent for production operations. The submitted document adequately describes this, and the planned and unplanned impacts appear to be in line with what would be expected for a project of this type. The EIS therefore appears to be acceptable. Consideration of whether the environmental impact described for the project is ultimately acceptable when balanced against the wider risks and benefits of the project to the Falkland Islands falls within the process of final project approval, and the granting of consent to a Field Development Plan.	Noted, thank you.
IND8 1	Global warming and climate change due to burning of fossil fuels is at last recognised as undisputable fact The International Energy Agency said in 2021 "If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal, from now – from this year." I do not see how a responsible government can proceed with approving a new oil development at this stage in our planet's history.	Refer to RSPB 7.

Reference	Representation	Navitas response
IND9 1	1. Presentation, length, language and style This project represents the most significant development in the Falkland Islands in the past 40 years. Given the proposed commitment of the Falkland Islands Government and community to environmental stewardship, it is essential that this EIS document is accessible and comprehensible to a wide audience. In this regard, I have some initial comments on the presentation, language and style used in the Environmental Impact Statement (EIS). In the same manner as choosing to name the oil field "The Sea Lion Field", featuring a cover image of penguins on a pristine coastline is misleading and inappropriate. This approach seems intended to evoke a sense of environmental harmony that starkly contrasts with the true nature of the proposed development. Such imagery may lead the public and stakeholders to underestimate the potential ecological risks involved. The EIS should accurately reflect the serious environmental implications of this project, rather than attempting to soften its impact with misleading visuals and branding. The EIS document is significantly longer than comparable documents, which typically range between 400 to 500 pages. While the length itself is not an issue, the extensive contradictory statements, redundancy and verbosity in the text complicates the review process for stakeholders. For example, the routine inclusion of institutional information and acknowledgements for grants and funding is unnecessary within the main body of the document. There are also instances where information is mentioned for past, current and future studies that form no part of this EIS. These factors may discourage community members from reading the document, limiting the opportunity for widespread public engagement and input.	Sea Lion was the name given to the initial prospect identified by RKH. Navitas is keenly aware of the beauty and special nature of the Falklands environment and the cover image was photographed by a member of the Navitas team. Regarding the length of the document, this is a complex development project in an area where the baseline was previously not known very well. EIASs of c 400-500 pages are generally appropriate for explorations EIAs as opposed to development EIAs in a new area. Other technical reviewers have complimented the structure and readability of the document.
IND9 2	2. Failure to identify fish related data gaps and missed opportunities Section 7.2.4. Data gaps: It is concerning that the Falkland Islands Offshore Hydrocarbons Environmental Forum (FIOHEF) did not appear to identify a single critical data gap regarding the potential for impacts of	One aspect of scoping is to identify any data gaps and available data that could inform the assessment. This was not identified as a data gap in scoping.

Reference	Representation	Navitas response
	oil development on fish populations in the northern slope area of the Falkland Islands, and area that is data poor. Given the vital role of fisheries in the Falkland Islands' economy and ecosystem, this appears to be a major oversight.	
IND9 3	Missed Opportunities: The Falkland Islands Government's Directorate of Natural Resources, Fisheries Department (FIFD), has conducted various surveys, including fisheries-independent demersal surveys from 2015 to the present. However, these surveys generally do not extend beyond the 200-250 m depth contour in the north of the Falkland Islands. The reason for this is that they cover the area in which shelf-based commercial fishing takes place. As a result, they do not cover the proposed development area, particularly the NS slope area (250-600 m), which remains critically data poor. The earlier consultations presented an opportunity to address these data gaps. By negotiating the inclusion of one to two additional days of sampling within the proposed development area, much-needed baseline data could have been collected, significantly enhancing the baseline for understanding of the local fish ecology and biology, setting a platform for ongoing monitoring and providing a more robust data collection strategy for assessing impacts.	Thank you for the comment and suggestion. Navitas would welcome such an opportunity for more data collection on the NS. Note that much of the data we have comes from Arkhipkin et al. (2012) and this review used data from 13,044 commercial bottom and pelagic trawls between 2000 and 2010 mainly within the FCMFZ, and from 1272 research trawls taken between 1999 and 2011. Some of which were conducted on the NFB.
IND9 4	3. Fish baseline data limitations The EIS for the proposed offshore oil development in the Falkland Islands waters presents significant shortcomings in its characterisation and presentation of baseline data for fish populations. Notably, it omits crucial updated information that could influence the assessment's accuracy. 3.1. Outdated and insufficient baseline data for fish populations Section 7.2: The baseline data for fish populations is reported to be sourced and collated through literature reviews. However, there seems to be a complete absence of current literature. Specifically, the median year from which references were sourced is 2012. There are no references cited in the section more recent then 2016. There has been an abundance	Thank you for the comment Navitas will update the text where relevant. The Laptikhovsky et al. (2013) is cited and referenced and Navitas will update the text with the Arkhipkin et al. (2023) reference and indeed any new relevant literature.

Reference	Representation	Navitas response
	of research undertaken with new findings on fish and cephalopod populations over the last decade. Given the significant ecosystem changes documented over this period (Laptikhovsky et al. 2013; Arkhipkin et al. 2023), the reliance on outdated data is concerning and undermines the relevance of the assessments. The EIS should incorporate recent research and extend its focus to include deeper waters adjacent to the proposed development to provide a comprehensive and accurate assessment of the potential environmental impacts.	
IND9 5	7.4.4.2.2.1: The seasonal abundances of fish and squid populations on the Northern Slope (NS) are based entirely on research undertaken by Arkhipkin et al. (2012b) using data acquired from mixed commercial fisheries and research surveys between 1999 and 2011. While this research provides some foundational baseline data for the shelf area around the Falkland Islands, its use as the sole baseline for assessing the proposed development area and the wider Northern Slope (NS) zone is problematic for several reasons: Geographic, and Temporal Data Gaps: The study's sampling sites do not comprehensively cover the Northern Slope (NS) area, particularly the deeper waters where the proposed development and dispersal pathways occur. The limited spatial and temporal coverage undermines the ability to accurately predict species distribution and biomass trends across the NS. As described above, this data is also outdated given large changes that have occurred in the ecosystem. Methodological Flaws in Biomass Estimation: The study assumes uniform species distribution across different habitats, extrapolating data from sampled areas to unsampled ones. This assumption, coupled with the limitations of using CPUE as a biomass proxy (particularly from selective fishing gear and strategies), results in inaccurate biomass estimates, especially in under-sampled deeper waters. Inadequate Consideration of Species' Life-History Stages: The use of selective data from commercial fisheries and inappropriate biomass	Thank you for the comment. Arkhipkin et al. (2012b) represents the most comprehensive review to date and its intention was to show patterns in the movement of nekton around the islands including the NS which covers the NFB. In this regard our Risk Assessment for fisheries is precautionary.

Reference	Representation	Navitas response
	estimates negates the importance of non-targeted species and life-history stages, such as juveniles, adults, and spawning individuals. This gap, along with the other methodological issues, further compromises the accuracy of the abundance trends described for the NS area.	
IND9 6	3.2. Specific comments on various fish populations My concerns particularly focus on the following aspects of fish populations in the area: Critical Life-History Stages of Skates: The data limitations significantly hinder understanding the life-history patterns and vulnerabilities of skate species, which are crucial for effective management and conservation. Foraging Areas for Migratory Fish: The EIS downplays the importance of foraging areas for key commercial and recovering fish stocks and lacks sufficient information to reliably assess and monitor the potential impacts of the proposed development on their distribution, biology, and abundance. Deep-Sea Vulnerability: The proposed development on the NS slope area intersects critical life-history stages and connectivity pathways of vulnerable deep-sea species. The potential impacts of the development on these should be considered in the EIS.	Thank you for the comments. The Risk Assessment with regards to fisheries is precautionary. Also note that under FIG's guidance (FIG, 2016) the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.
IND9 7	3.2.1. Critical life-history stages of skates The only skate species mentioned in any level of detail in the EIS is the yellownose skate (Dipterus chilensis). This species was redescribed five years ago as consisting of D. chilensis (only occurring in the Pacific), and D. lamillai, the warrah skate, thought to be endemic to Falkland Islands waters (Concha et al. 2019). The proposed development area on the Patagonian shelf and slope is a globally recognized hotspot for skate species, with over 22 recorded species, including those of commercial significance (Arkhipkin et al. 2012a, 2023). This region supports: Commercially important species: Bathyraja brachyurops, B. albomaculata, B. griseocauda, and Dipturus. lamillai. Commercially valuable bycatch species: Bathyraja cousseauae, and B. multispinis.	Thank you for the comments. Navitas will update the text where appropriate. The risk assessment with regards to fisheries is precautionary. Also note that under FIG's guidance (FIG, 2016) the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.

Reference	Representation	Navitas response
	Smaller bycatch species and juvenile: These play crucial ecological role. Many of these species are keystone species essential for maintaining ecosystem stability. However, they are particularly vulnerable due to their long life spans, slow growth rates, and low fecundity (Grosell and Pasparakis 2021). Declines in abundance have been reported for several of these populations according to the IUCN (Winter and Arkhipkin 2022), with B. albomaculata listed as vulnerable, B. griseocauda as endangered, and D. lamillai, appearing to be endemic to the Falkland Islands (Concha et al. 2019). The proposed development is likely to overlap with areas crucial to these species, including during key life-history stages such as spawning and recruitment (Arkhipkin et al. 2012a, 2023). The failure to delineate the areas during which these critical stages occur, and their overlap with the proposed development, represents a significant data gap (Lee et al., 2022; Ramos et al., 2023; Ramos et al., 2024). Without precise identification and protection of recruitment, juvenile, and spawning areas— many of which likely coincide with the development site—the potential impacts on these vital skate populations cannot be accurately monitored, assessed, or mitigated. This oversight could result in irreversible harm to species that are already vulnerable or endangered.	
IND9 8	3.2.2. Foraging areas for commercially significant migratory fish species The proposed development area overlaps with critical foraging and migratory pathways for several commercially and ecologically significant fish species in the Falkland Islands. The Environmental Impact Statement (EIS) seems to downplay the importance of the Northern Slope area to these populations. This is likely due to the use of outdated references and data as described above. The following key species are of particular concern: Common hake (Merluccius hubbsi): Since 2015, common hake has become the dominant fish biomass around the Falkland Islands, surpassing rock cod and becoming the primary target of finfish fisheries.	Thank you for your comment. This is noted and the text will be updated where appropriate. The baseline here was informed by the most recent review in Arkhipkin et al. (2012). This paper was based on an analyses from 13,044 commercial bottom and pelagic trawls between 2000 and 2010 mainly within the FCMFZ, and from 1,272 research trawls taken between 1999 and 2011. Some of these were conducted on the NFB. Migration pathways are not likely to have changed since this work. However, the assemblage has changed dramatically due to a mixture of environmental change and over exploitation of rock cod and southern blue whiting, with hake now being the dominant commercial species. As described in Arkhipkin et al (2012), hake is a shelf species and southern blue whiting is a shelf break species. The Sea Lion Field sits beyond the shelf break in 450 m on the deeper parts of the North Slope (NS).

Reference	Representation	Navitas response
	Observational data from FIFD research surveys suggests that a key feeding and migratory pathway occurs to the north of the Falkland Islands in waters deeper than 200 m (NS area), which overlaps with the proposed development area. Recent survey and commercial data suggest that the deeper waters are important for larger female individuals as they migrate to southern feeding areas in the SS and SEOS areas. However, baseline data to describe the full distribution range of common hake is not available, and their dynamics within Falkland Islands waters are poorly understood. Without this information, the potential impacts on these populations cannot be accurately monitored, assessed, or mitigated. This gap in research has been identified by the FIFD and must be addressed to prevent unintended consequences on this vital fishery. Blue whiting (Micromesistius australis): The proposed development area also intersects key feeding and migratory pathways for blue whiting, a species that has previously experienced a significant population collapse and is currently in recovery (Laptikhovsky et al. 2013). This life-history stage, where blue whiting migrates and forage, is critical for their growth and subsequent spawning success (Busbridge et al. 2020). Disruption to these pathways due to the proposed development could severely hinder their recovery, potentially leading to another population decline (McKeown et al. 2017). Given the fragile status of blue whiting, continuous monitoring of their abundance and population structure in this area is essential. Baseline data is critical for assessing the impact of any changes resulting from the development to ensure that the species' recovery is not compromised.	As noted by the commenter, there are some gaps in knowledge. However not all gaps can be filled, practically, economically and logistically. Under FIG's guidance (FIG, 2016) the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore, the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.
IND9 9	3.2.3. Life-history stages of vulnerable deep-sea fish The proposed development area intersects with critical life-history stages of deep-sea species, such as the Patagonian toothfish (Dissostichus eleginoides) and ridge-scaled grenadier, both of which are highly vulnerable to anthropogenic and environmental pressures (Roberts 2002; Laptikhovsky 2011; Lee et al. 2019). Patagonian toothfish (Dissostichus eleginoides)	Please see comments and responses to IND9 10, IND9 11, IND9 12. Navitas will update the text and references with any new material.

Reference	Representation	Navitas response
	The EIS presents outdated information on the ecology and population structure of the Patagonian toothfish, failing to incorporate the latest research. Recent studies reveal that the development area directly intersects with key life-history periods and connectivity pathways, posing significant risks to the population's sustainability (Arkhipkin and Laptikhovsky 2010; Brown et al. 2013; Lee et al. 2018, 2021, 2022, 2024; Troccoli et al. 2023; Kim et al. 2024).	
IND9 10	Key findings related to the development area: Population discreteness: The EIS mentions a wide distribution around the sub-Antarctic. However, it fails to acknowledge the patchy distribution and discrete population structure that occurs across this wide distribution. Around the Falkland Islands the species consists of a discrete population consisting of contingents from Chile, Burdwood Bank, and local groups, arising through egg and larval dispersal (Laptikhovsky et al. 2006; Rogers et al. 2006; Arana 2009; Ashford et al. 2012; Lee, B 2022; Arkhipkin et al. 2022; Lee et al. 2024). Species exhibiting such population structure are considered vulnerable, and the preservation of this diversity is crucial for ecological stability and resilience (Hilborn et al. 2003; Schindler et al. 2010). Egg and larval dispersal pathway: While there is no evidence to suggest that Patagonian toothfish spawn in the NS, eggs and larvae from southern spawning areas are dispersed northwards across the NS (Ashford et al. 2012; Lee et al. 2024). These would likely be susceptible to associated pollution risk and should be considered in the impact assessment. Adult site fidelity: The EIS describes a migratory life-history for adult Patagonian toothfish. Adult life-history stages exhibit strong site fidelity with no evidence of seasonal migratory behaviour (Brown et al. 2013; Lee et al. 2018, 2022; Troccoli et al. 2023). A significant portion (75-95%) of the population remains resident in deep-sea habitats adjacent to the proposed development area throughout their life. This means that any impacts from the development are likely to have long-lasting and potentially severe consequences for the population.	Thank you for the comment. Navitas will update the relevant baseline section with more recent reference including Kim et al. (2024) on toothfish movement.

Reference	Representation	Navitas response
	Adult large-scale movements: A small percentage (5-25%) of the population undertakes large-scale movements (home-range relocations) towards southern spawning grounds (Lee et al. 2022; Troccoli et al. 2023). The northern slope, adjacent to the development area, serves as a vital movement corridor linking northern deep[1]sea habitats (both in Falkland and High Seas waters) with these southern spawning grounds. Disruption to this movement corridor could hinder these essential migrations, potentially affecting reproductive success and the overall sustainability of the population. Recruitment and early life-history movements: Important nursery areas lie adjacent to the development area, with connectivity pathways that link these nurseries with adult deep-sea habitats, passing directly through the development area. Key nursery areas have been identified south of the Falklands (inshore of Beauchene), west (Jason Islands), and north (inshore of the development area) (Ashford et al. 2012; Lee et al. 2021, 2024). Recruitment into these areas shows strong temporal variability, occurring in sporadic pulses every 5-10 years (Arkhipkin and Laptikhovsky 2010; Lee et al. 2021). This life-history aspect increases the vulnerability of the species. During their ontogenetic development, these nursery areas are linked to adult habitats in the north (offshore of the development area) and east by persistent connectivity pathways (Arkhipkin and Laptikhovsky 2010; Lee et al. 2021, 2024). These downslope movements through the connectivity pathways are protracted, extending directly through the development area over a 4–10-year period. Protecting these nursery areas and connectivity pathways is essential for maintaining the sustainability of the species – and the proactive development of management measures has been a clear focus point by FIFD, particularly for implementation during years of high recruitment.	
IND9 11	Ridge-scaled grenadier (Macrourus carinatus) The EIS provides limited information on the ridge-scaled grenadier, a species with characteristics indicating high vulnerability (Lee et al. 2019). This species is believed to consist of a single reproductive stock	Navitas has been precautionary with regard to fisheries. Please note that the rough-scaled grenadier is widely distributed around the Falkland Island and the southern ocean and has wide spawning and reproductive distribution. There are spawning grounds around the Falkland Islands and

Reference	Representation	Navitas response
	within the waters surrounding the Falkland Islands (401–1391 m) (Laptikhovsky 2011). Spawning occurs year-round, including within the proposed development area to the north of the Falkland Islands (Laptikhovsky et al. 2008; Laptikhovsky 2011; Lee et al. 2019). Given the ridge-scaled grenadier's restricted distribution and the year-round spawning within the development area, the potential impacts of the proposed activities on this vulnerable species warrant serious consideration. Failing to account for the species' life-history characteristics and habitat requirements could lead to significant, long-lasting impacts on its population viability.	so the Sea Lion field as an area is considered small within this wider distribution and any impact is likely to be short-lived and reversable with little impact to the overall population given the abundance and distribution.
IND9 12	Table 7.10: The high abundance of Patagonian toothfish on the NS is the same throughout the year (not just restricted to Summer and Autumn). The high abundance of common hake on the NS is throughout the Autumn-Winter (not restricted to Summer). Survey data shows that kingclip is prevalent throughout the year. Ridge-scaled grenadier should be added to the table. Other important skate species should be included, such as B. albomaculata, B. brachyurops, B. griseocauda, B. cousseauae, B. multispinis. The catshark (Schroederichthys bivius) is another abundant species not considered in the EIS.	Fisheries species are considered collectively with the exception of the major target species. Note this is a summary. Navitas will update the table where appropriate. Much of these data were from Arkhipkin et al (2012) which represents the most comprehensive review of this type to date. This work analysed seasonal changes in relative abundance and biomass of nektonic predators were analysed on the eastern Patagonian Shelf and continental slope.
IND9 13	12.1.4.2.3.1 The following statement is inaccurate - “Typically, adult fish are not considered highly sensitive to impacts of oil spills.” Adult fish are indeed capable of avoiding water with high hydrocarbon concentrations (Hjermann et al. 2007), however, this does not negate their sensitivity to associated ecosystem and long-term effects. There are numerous references in this regard (Balk et al. 2011; Ainsworth et al. 2018; Cave and Kajiura 2018; Grosell and Pasparakis 2021). Just to provide two specific examples, an ecosystem model that was used to assess the impacts from the Deepwater Horizon oil spill of fish guilds suggested that the biomass of large reef fish decreased by 25-50%, and large demersal fish by 40-70% (Ainsworth et al. 2018). This was a result of the impacts on demersal foraging areas leading to starvation. Recovery in high turnover populations was predicted to occur within 10 years, but slower-growing populations over 30 years to fully recover. In another study in the North Sea (Balk et al. 2011), haddock and Atlantic	Noted, thank you. These references will be reviewed.

Reference	Representation	Navitas response
	cod populations were shown to be under significant environmental stress due to the chronic effects of oil-related pollution, leading to reduced health, reproductive success, survival and subsequent declines of these fish populations.	
IND9 14	12.1.4.2.3.2 “Sea Lion crude on zebra fish (Danio rerio) eggs found that the crude is unlikely to impact these fish eggs in the event of a spill.” Zebrafish are a tropical, freshwater, highly adaptable species, capable of surviving and being reared in a wide range of conditions – thus the likely use of them as the species in these toxicity tests. However, this also makes comparisons with species in the Falkland Islands (a marine, temperate, cold-water environment) difficult. Specifically, warm-water organisms are more robust to toxicity test procedures compared to their cold-water counterparts, such as for example cod (Hjermann et al. 2007).	Thank you for the comment.The Hjermann et al. (2007) paper review examines the effects of a hypothetical oil spill on fishes in this area, with a focus on effects on the egg and larval stage of the 3 dominating fish stocks: NE Arctic cod Gadus morhua, Barents Sea capelin Mallotus villosus, and Norwegian spring-spawning herring Clupea harengus. Data on egg and larval dispersal are not available for most species in the Falkland Islands.Zebra fish eggs are the standard laboratory test in ecotoxicology. These tests were done under laboratory conditions with Sea Lion crude. Zebra fish eggs are the standard laboratory tests because there are protocols for handling them and they survive well under laboratory conditions. These are why they are used as an analogue. Testing of cold water eggs would be extremely difficult for marine fish here in the Falkland Islands; although this has been done on research cruises for embryology experiments, the eggs do not survive well outside of their natural conditions and it would be very difficult to understand what factors are causing mortality in addition to any toxicological factors. The properties of sea lion crude are such that a toxicological impact on cold water fish eggs at the concentrations expected in a spill event and in cold water temperatures would be negligible at worst. See also responses to IND 3 5, IND 3 9 and IND 3 10.
IND9 15	5. Recommendations To address the significant concerns identified in the EIS, the following recommendations are proposed: Acknowledge and Address Data Gaps: The EIS should explicitly recognize and address the existing data gaps, especially concerning the critical life-history stages and habitat use of skates, migratory fish, cephalopods, and deep-sea fish. This acknowledgment is crucial for developing an accurate and comprehensive environmental impact assessment.	Navitas believe gaps have been acknowledged and a precautionary approach has been taken. In addition, under FIG's guidance (FIG, 2016) the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.

Reference	Representation	Navitas response
IND9 16	Enhance Surveys: Initiate discussions and collaborate with the Falkland Islands Fisheries Department to include additional survey stations in the proposed development area. This will help address the substantial data gaps, particularly those related to the life-history stages and habitats of key species.	Thank you for the comment. Collaboration would be welcome and this can be discussed in the FIG proposed long-term monitoring plan.
IND9 17	Update Baseline Information in the EIS: Incorporate the latest research and data from surveys conducted by the Falkland Islands Government's Directorate of Natural Resources, Fisheries.	Thank you for the comment. Navitas will update the text with relevant references where appropriate.
IND9 18	Improve Monitoring: Collaborate with relevant stakeholders to design and implement a comprehensive monitoring plan that specifically targets the NS area. This plan should aim to improve understanding and management of these ecologically significant regions, focusing on the species and habitats most at risk. Implementing these recommendations will help ensure that the EIS reflects the best available science and provides a framework for managing the environmental impacts of the proposed development.	Please refer to section 15.1, the EMMP included in the EIS details the actions and plans required to: • Measure and monitor the predicted and potential impacts (primarily the 'Severity of Effect') of the Development, • Check the efficacy of the project-specific mitigations in place, and • Address uncertainties, such as spatial / temporal data gaps, to increase the level of confidence in the impact / risk assessment. Should the monitoring of impacts indicate that the significance of the impacts and risks predicted in the EIS are not appropriate, and / or that mitigation is not effective, a revised mitigation measure and / or monitoring regime will be required. A workshop to consider the content of the EMMP was held and attended by 25 interested stakeholders, comprising FIG, POEPL, industry bodies and NGOs. The EMMP will be managed by a governance board consisting of representatives of FIG and Navitas, supported by an advisory forum including both non-technical stakeholders and relevant individuals with expertise in the subjects being monitored and managed.
IND10 1	Notwithstanding the myriad of data gaps, inconsistencies and errors this document contains - as identified by a number of informed, professional parties and individuals - my comment here relates to the foolhardiness of opening up oil and gas fields in the Falklands. Our oil industry aspirations date back to the efforts of FIG civil servants	Thank you for your comment. This is noted. However, Navitas considers these comments are for FIG consideration.

Reference	Representation	Navitas response
	in the early 1990s, when the role of the oil and gas industry in precipitating climate change and greenhouse gas emissions had not yet entered mainstream political consciousness, and certainly not that of the Falklands. 30 years on times have changed dramatically and it is now no longer seen to be politically or globally acceptable for a self-styled environmentally responsible country to be opening its doors to an industry that is widely acknowledged as the cause of human-induced environmental damage on a scale never seen before. To quote the statement from Falklands Conservation: "The International Energy Agency has stated that no new oil and gas fields should be opened if we are to achieve net zero emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit, avoiding far more severe climate change effects on wildlife, ecosystems and people, including for the Falkland Islands. Opening a new oil field in the Falkland Islands would not align with this..." No matter how robust (or otherwise) the EIS statements are regarding environmental and social impacts, risks and sensitivities, and associated proposed mitigation measures, they are of no relevance to the central issue which is we should not be part to the opening up of new oil and gas fields.	
IND11 1	Regulatory and Legal Framework The Falkland Islands is not ready for hydrocarbons production. Oil Readiness has languished, and whilst MLAs have re-prioritised work in recent months, this has not resulted in demonstrable revisions to the legislation and regulation required to oversee a production industry. The Department of Mineral Resources is under resourced and this consultation itself demonstrates that: “The EIS consultation process and further detailed review can be managed with current staff through reprioritisation of other activities. Future resourcing requirements for the regulation of offshore hydrocarbons are addressed in other ExCo	Navitas continues to work with FIG and its key contractors to ensure that its arrangements are aligned with industry best practice and FIG's planned changes to legislation. Navitas expects that FIG will comment separately on the EIS public consultation representations which cover FIG’s Oil Readiness and planned legislation.

Reference	Representation	Navitas response
	papers." FIG has failed to adequately prepare for this EIS submission and is currently not able to regulate a hydrocarbons industry to international best practice. This is a significant risk to the Falkland Islands environment and brings risk of contingent liability to the UK Government. Whilst "It is considered that this EIS will generally be compatible with future planned legislation", this legislation is not in place, and Navitas cannot be held to legislation that is not in force. This risks legal challenge and future lawsuits if attempting to ensure higher standards are adhered to later. 10.2.1 of 118-24P states that the new environmental legislation will be in place by 2025 – this seems wholly unachievable when viewed against the FIG legislative program and the continued failure to move this project beyond policy and drafting instructions. Without robust environmental legislation in place for the EIA process and proposed Environment Case (policy approved in 2018), there are significant gaps in the current regulatory framework (e.g. lack of Polluter Pays and liability, identified gaps in the Conservation of Wildlife and Nature Ordinance) which have been highlighted for almost a decade. Commitments made by FIG to have best practice environmental and safety legislation in place prior to hydrocarbons development have not materialized.	
IND11	The ExCo paper that sought approval for public consultation on the EIS contains errors and had the incorrect version of the EIS appended (incorrect CO2 emission figures) – the document approved by ExCo should be the document which is consulted upon – this failure to follow due process is concerning but consistent with FIG decision making in recent years.	The EIS was updated to present additional emissions data following publication of the ExCo paper that sought approval for public consultation. The updated EIS was subject to Public Consultation and will be considered by ExCo.

Reference	Representation	Navitas response
IND11 3	The EIS consultation process appears muddied, with the role of FIG as regulator and Navitas as developer unclear at times and occasionally appearing to carry direct conflicts of interest.	Navitas has followed FIG's EIA Guidance regarding the Public Consultation process.
IND11 4	The EIS is inconsistent with FIGs objective to 'reduce our carbon emissions, in order to ensure we act as a responsible global citizen' (Islands Plan 2022). FIG cannot continue to state that the environment is of great value and importance whilst taking actions that directly conflict with these statements. A hydrocarbons industry would be good for the economy, not the environment, it is that simple.	Thank you for your comment. This is noted. However, it is not for Navitas to comment on FIG policy and we would refer the representation to FIG.
IND11 5	The EIS is largely based on the previous Premier submissions, but with amendments to the development to cut costs (e.g. smaller repurposed FPSO and direct offtake to tankers of opportunity brings greater spill risks –FIG is currently not in a position to adequately control or regulate this oil spill risk).	Amendments to the former Premier proposals are not, as suggested, driven by cost considerations. The field development approach adopted by Navitas enables a more carbon intensity efficient approach to the development. Premier's proposal to utilise a larger FPSO would have led to utilisation inefficiencies in later field life as production declined. In addition, by redeploying an existing facility Navitas is removing the additional environmental impact arising from construction of a new vessel. There will, however, be considerable investment in upgrades and modifications to the candidate FPSO prior to its deployment to the Islands to ensure that it is optimally configured for the Sea Lion Phase 1 and 2 development. Direct offtake to tankers of opportunity was a feature of the previous Premier proposal, and removes the need for double handling of cargos and the inshore spill risk which was associated with Premier's initial inshore transfer oil export concept. The Direct Offtake to tankers of opportunity is considered a connected activity - as such it will be regulated both under FIG's Offshore Safety legislation which it is anticipated will have been fully updated prior to operations commencing, and Falkland Islands Maritime Legislation. Navitas is committed to following international best practice for tanker operations, and will instigate extensive vessel vetting procedures prior to tankers being selected to offtake cargos.

Reference	Representation	Navitas response
IND11 6	Whilst FIG has failed to bring in new legislation for this proposed development, Navitas has also failed to provide new data to inform their EIS submission. It is the responsibility of the developer to ensure that adequate, site-specific data is available for the proposed development. The GAP project (jointly funded) did populate some data gaps for use in environmental impact statements, but there remain outstanding pieces of work that are directly relevant to Sea Lion (such as impact of Sea Lion crude on pelts/feathers that Premier had previously committed to). The age of seabird data has previously been criticized. Data collection should be proportionate to the development, but Navitas do not appear to have directly undertaken any studies to inform this updated EIS.	Thank you for the comment. The age of the SAST data has been acknowledged and Navitas commit to collecting new data via SMMOs for three years pre first oil. The oil was tested extensively at a world leading laboratory in France (CEDRE). Many seabird feathers were tested. Fur seal pelts were not tested because import permits were not able to be obtained. Please refer to the EMMP Chapter 15. Efforts to acquire import permits (to France) will recommence and if acquired, testing of pelts is anticipated to occur between project sanction and first oil.
IND11 7	Carbon emissions and offsetting "Future operator-led direct and indirect offsetting in the Falkland Islands including carbon and biodiversity offsetting that includes Falklands-specific habitat restoration projects. To enable this, Navitas will create an internal fund which will initially be used to commission research and feasibility studies that lead to pilot offsetting schemes that can be expanded to enable large scale in-Falklands habitat restoration (Carbon sequestration) and biodiversity offsetting. Navitas will monitor opportunities to fund/undertake direct and indirect offsetting throughout Field Life." OPRED queried "How offsetting projects would be identified and managed" – this is still unclear in the EIS and remains an area of concern. Utilising an internal fund fails to demonstrate independent input and verification. FIG previously approved legislation for an Environment Trust to be put in place for this purpose (which has not been enacted). The Environment Trust proposal would prevent either a developer or FIG from utilizing the Fund for non-additional projects and instead would aim to achieve net environmental benefit.	Perhaps the use of the word 'Internal' has been misconstrued - the Fund will be funded internally, but the intent is that the oversight and governance will have FIG and Independent NGO representation as well as independent technical/environmental advisors. Navitas has prepared and submitted a briefing paper to FIG that outlines the intent of the fund. Navitas believe that this aligns with FIG policy and legislative requirements.
IND11 8	The carbon emissions will dramatically increase the Falklands national emissions figures. That should be recognized and reflected in the context of the EIS, not just as a comparison to wider UK GHG emissions. Continuing to develop hydrocarbons is not in line with Net Zero	Section 10.9.4.3.1 sets the context for the Falkland Island emissions. Comparison to Falkland Islands emissions is presented in Section 10.9.4.5.1. POEPL did not specifically itemise flaring that may result from unplanned

Reference	Representation	Navitas response
	aspirations, neither for the Falklands nor the UK, but would bring economic gain. The flaring base case appears to have increased from the previous Premier submission, with associated increases in emissions, is this increase justified?	process upsets and Navitas has included this potential, with a highly conservative (high) estimate. The only flaring POEPL referred to is that associated with commissioning and they estimated 862 t/d vs. the 389.2 t/d estimated by Navitas (Table 10.63). Navitas are committed to a zero routine flaring philosophy (Section 5.8.4.4) and flaring emissions are not higher than those proposed by POEPL.
IND11 9	If the EIS is to be accepted, then conditions should be applied including consultation on proposal for environmental monitoring plans, offsetting, oil spill plans. Ultimately, the Falklands is not oil ready and whilst there may be substantial economic gain on the horizon, is it worth the risk if we can't prevent our national resources and environment? It is laudable to be aiming at international best practice, but we aren't there, and we don't have the resources to get there any time soon.	Thank you for your comment. This is noted. However, Navitas is unable to comment on what controls (if any) FIG should place on the project's acceptance. It should, however, be noted that: 1. Conditions can be applied to any acceptance. 2. Navitas has already committed to an Environmental Management and Monitoring Plan, a Carbon & Biodiversity Offsetting Fund and has issued preliminary OPEPs to FIG These examples indicate the 'best practice' that is already being applied to the development.
IND12 1	1) Social effect - competition for resources 1.1 – Housing Sections 7.7.4.5.1 and 11.3.6.1.2 of the EIS recognise the risk of competition for resources as a social impact as "low" and sensitivity of the effect as "minor" - this assessment significantly underestimates the real-world implications that such competition is likely to have on the community. The EIS does not present extensive quantitative data on the real issue of the effect of increased cost of housing on the community, and there is substantial anecdotal evidence from past instances where oil development was anticipated. In these cases residents have reported sharp increases in rental prices and sale prices of properties as a direct consequence of the speculative behaviour of businesses. Land-banking has continuously exacerbated the housing crisis, driving up accommodation costs for both purchase of land and for private rental. These impacts disproportionately affect vulnerable populations of the	Socio-economic aspects of the development (e.g. house prices etc.) were screened out of the EIS in agreement with FIG (Section 6.2.2.1) whereas social impacts, such as competition for resources were screened in, which is captured in the FIG EIA Guidelines. Socio-economic impact assessment will consider pressure on housing (both supply and demand and potential house price/rental inflation, construction constraints) in more detail. The socio-economic monitoring and management plan will monitor impacts throughout the project life-cycle and enable Navitas and FIG to explore potential mitigations and management actions as the project matures. Issues associated with land availability and housing are relevant to Falkland Islands economic development in general and not specific to the Sea Lion phase 1 and 2 development.

Reference	Representation	Navitas response
	islands, who may be priced out of their homes or face a sharp drop in quality of life due to rent increases and a lack of options for alternative residence due to the sudden surge in demand. The experiences shared by those who lived through previous cycles of oil development are crucial indicators that should not be overlooked or downplayed. While these impacts may not always be fully captured in statistical data, they reflect genuine hardships which the community may face, and thus, the potential severity of these social impacts deserves a more thorough and realistic assessment in the EIS. The EIS also significantly overlooks the increased demand for tradespersons driven by the oil industry. This surge in demand will likely reduce the speed at which new residential properties can be constructed in the Falklands—a region already grappling with limitations on how quickly housing can be built. The current shortage of tradespersons is a known issue, and the influx of oil-related work will only exacerbate this problem. As tradespersons gravitate toward the more lucrative opportunities in the oil sector, the availability of labour for residential construction will decrease, slowing down the rate at which new homes can be built. This shift will also drive up the cost of labour, as tradespersons become accustomed to higher rates of pay from the oil industry. Consequently, even those who can afford the already increasing housing prices may struggle to find available builders, further intensifying the housing crisis. Moreover, this situation will disproportionately affect individuals and families who cannot compete with the higher wages offered by the oil sector. The increased cost of construction services will make it even harder for them to afford new homes, potentially leading to greater inequality in housing access and worsening the existing housing shortage. The EIS fails to account for these dynamics, which are crucial	

Reference	Representation	Navitas response
	in understanding the full scope of the oil project's impact on the local housing market.	
IND12 2	1.2 – Electricity The EIS also appears to underestimate the potential impact of increased competition for electricity (section 11.5), which poses a significant risk to the Falkland Islands' already outdated power infrastructure. The current electricity grid and power station are operating beyond their optimal capacity, and the additional demand generated by the project will place an even greater strain on these systems. As the demand for electricity rises, the burden on existing generators will likely accelerate the need for their replacement. The government's current approach to infrastructure funding involves passing a portion of the costs for depreciation and replacement onto the public. This model suggests that the increased strain on the electricity system will not only drive up the immediate costs of electricity but will also result in a continuous cycle of rising expenses for consumers. These costs could escalate further if the new generators are not promptly replaced, especially given the logistical challenges associated with the Falklands' remote location. Moreover, any delays in replacing or repairing generators could exacerbate the situation, leading to potential outages or further price hikes. The EIS does not fully account for these risks, which could have far-reaching consequences for the local population. The assumption that new generators will be readily available or that upgrades will be seamlessly implemented underestimates the complexities involved in such a remote environment as the Falklands. This could lead to a significant and sustained increase in electricity costs, disproportionately affecting residents and businesses alike. None of these issues are addressed by measures offered such as off-peak power utilisation and sustainable design, as there will always be an increased burden on the electricity supply resource of the Falklands, and	Competition for electricity is assessed as 'upper moderate', to reflect this issue. FIG have confirmed increased power will be available by the start of operations and Navitas will work closely with FIG to ensure their energy needs can be met without compromising the community's needs. Cost of electricity to the consumer is controlled by FIG.

Reference	Representation	Navitas response
	therefore the above issues of reduced service periods and stress on existing staff and systems.	
IND12 3	1.3 - Water access and infrastructure capacity The issue of water access is another area where the Environmental Impact Statement (EIS) appears to underestimate the potential strain on existing infrastructure. The current water system in the Falkland Islands is already operating at full capacity, struggling to meet the demands of the population and existing industries. While the EIS acknowledges that work is planned to upgrade and expand the water infrastructure, these upgrades are primarily designed to accommodate a gradual increase in the population and typical industrial and commercial growth. However, the scale of development associated with the oil industry far exceeds the projections on which these upgrades are based. The oil project, along with the necessary ancillary developments—such as new residential properties, higher industrial water usage, and other significant infrastructure projects—will demand a much greater increase in water capacity than currently planned. Even if the proposed water infrastructure developments are completed on time and reach their expected capacity, they would likely only just meet the needs arising from this natural growth. Adding the significant additional demands from the oil industry could push the water system beyond its limits almost immediately upon completion. This scenario raises serious concerns about the sustainability and resilience of the water supply. The potential for delays or shortfalls in the planned upgrades could lead to severe water shortages, further exacerbated by the increased demand from oil-related activities. The EIS does not appear to fully account for these risks, nor does it provide a comprehensive plan to address the additional pressure that oil development would place on the water infrastructure. If the capacity of the water system is reached or exceeded, this could result in rationing, increased costs for consumers, or the need for	Competition for water resources is assessed as Upper Moderate, reflecting the challenge, and notes that without changes to the current water system Sea Lion will exceed Stanley's capability to produce water in Stage 1. Navitas are working with FIG to ensure the water system will be suitable for Sea Lion development and have included a trickle feed and other water saving measure (e.g. all vessels arriving with water makers and loaded with potable water, seawater being used for drilling) to minimise water usage. Navitas has provided FIG with projected requirements, and FIG expects to be able to accommodate these. The SIA will build upon the commentary already included in the EIS re water, electricity etc.

Reference	Representation	Navitas response
	emergency infrastructure investments, all of which would have significant social and economic impacts. It is essential that the true scale of water demand from the oil industry and associated developments is accurately assessed and factored into the planning and execution of infrastructure projects to avoid a critical shortfall.	
IND12 4	1.4 - Fuel and bunkering, economic stability as affected by fuel stocks The Environmental Impact Statement (EIS) acknowledges that Stanley Services Limited stocks fuel according to demand. However, it fails to fully consider the broader implications of this practice on the local economy and the community's cost of living. As Stanley Services adjusts fuel pricing based on the ratio of what remains in the tanks to what needs to be restocked, any increase in demand—such as that driven by the oil industry—would have a significant and potentially destabilising impact on fuel prices. With the advent of the oil project, fuel demand will likely fluctuate more dramatically, particularly during peak periods of oil-related activity. This increased and unpredictable demand would lead to more frequent and potentially sharper adjustments in fuel prices. The community, already sensitive to fluctuations in the cost of living, would face a rolling impact as fuel costs rise more rapidly and unpredictably. This volatility would not only affect household budgets, particularly for kerosene and diesel, which are critical to daily life, but also complicate financial planning for businesses and government projects alike. For government and commercial entities, the unpredictability in fuel costs could lead to inaccurate economic forecasting and budgeting, causing delays or cost overruns in key projects. For the average resident, the increased cost of fuel would ripple through the economy, affecting the prices of goods and services that depend on fuel for transportation and production. This could lead to a less predictable and more challenging economic environment, where the cost of living becomes increasingly difficult to manage, particularly during periods of heightened oil activity.	Thank you for your comment. Navitas has spoken with Stanley Services Ltd (SSL). They have commented that 'the comments are factually inaccurate with both domestic fuel and bunker fuel prices having separate pricing mechanisms with one not reliant on the other but are based around world fuel prices. As part of the fuel license agreement between FIG & SSL, SSL has to keep minimum stocks of certain grades for domestic fuel. The minimum stock level is calculated on average sales, any large change in sales will have a negligible impact on pricing and if anything larger sales will assist in keeping prices lower for domestic fuel grades. Bunker fuels are treated differently and there is no requirement for any minimum stock levels. However, an increase in bunker fuel sales will more likely have a minimal positive effect in reducing domestic fuel prices rather than raising them'.

Reference	Representation	Navitas response
	The EIS does not adequately address these potential economic impacts, nor does it propose measures to mitigate the increased volatility in fuel prices that would result from the oil industry's influence on fuel demand. It is crucial that these factors be taken into account to ensure that the economic well-being of the Falklands community is protected in the face of such significant developments.	
IND12 5	1.5 - International flights The proposal to monitor use of existing airlinks for potential impact is not sufficient to address the potential impact of additional use of the flights. While it is asserted that charter flights could be used by oil companies at various points, it is not addressed that there will be a profit incentive for Navitas to use the existing airlinks where possible. This will have substantial negative impact, with room for a rolling impact in various scenarios. Additional use of existing airlinks, even if it is not considered significant by oil interests, would not have to be high to have a substantial impact on availability of flights for both members of the public travelling to and from the islands for holidays - or visits to home countries for migrants. Existing airlinks already operate at capacity, and in the case of the existing South America link a heavier push on existing capacity is likely to increase prices - either affecting the cost to consumers or the cost to government, indirectly affecting residents by tax revenue usage. Additionally, the airbridge connection also operates at capacity, and is regularly delayed. At this time there are regular cases where residents are waitlisted when there are delays causing merged flights, causing significant expense to travellers and major inconvenience to local businesses and government. With additional strain on capacity to the airbridge such delays would only cause more significant clashes and frustration, longer waitlists, and disproportionately affect those who are	The usage of both the Airbridge and LATAM is discussed in section 7.7.4.3. The impact assessment is covered in Section 11.6. Airlinks will be discussed further in the socioeconomic impact assessment. The current stretch/difficulties regarding air links are keenly understood. The difficulties associated with existing air links noted in the comment explain why Navitas has committed to its own charter flight during the development, SIMOPs and production phases of the Sea Lion development. Currently Navitas would not be able to run its operations using the existing airlinks given both the limited seat availability and waitlisting arrangements, and that an international airframe needs to remain on the ground for sufficient time for the helicopters to complete the offshore crew change. Navitas will work closely with FIG and BFSAI prior to operations to ensure that its charter flight operations can be accommodated at Mount Pleasant International Airport. Oil industry charter flights were accommodated at MPA during previous exploration campaigns.

Reference	Representation	Navitas response
	least able to afford the delays - particlarly as those who are prioritised on waitlists are senior government officers and BFSAI staff. Each of these issues could face yet more compounded negative effects which are not given due significance as the Mount Pleasant Complex has a majorly limited capacity for inbound and outbound flights. As such, even were charter flights used this would limit the windows in which delayed flights could enter and depart the islands, leading to greater delays, frustration for then public, and expense for government and local businesses and residents.	
IND12 6	2) Effect on quality of life for Falklands residents The basis of pursuing the establishment of an oil industry, it is asserted, is to be able to fund work and projects to increase quality of life for Falklands residents. Here I highlight a number of areas which show that there are a range of areas of negative effect for quality of living in the Falklands. 2.1 – Access to employment It is often asserted that the introduction of an oil industry will improve employment and provide funds for a range of infrastructure projects for the Islands. These claims are universally made for oil projects in various countries, and have been shown to be false. It has been shown that for migrants oil has no positive effect on likelihood of employment, and that the effect on hired jobs in both high and low oil regions of hydrocarbon exporting nations is significant negative (Sigal, 2016). Also, areas where oil is located over time tend to suffer from lower economic growth and lower per capita incomes than the rest of the country, greater dislocations, higher environmental and health hazards, and higher levels of conflict. Economically, petroleum fails to offer long-term sustainable employment alternatives at the local level, but it can seriously disrupt pre-existing patterns of production. The promise of new jobs that new oil exploitation seems to offer	The comments are noted. They are out of scope for the EIS (Section 6.2.2) however this they are covered in the Social Impact Assessment (SIA). It should also be noted that the full employment situation in the Falkland Islands mean that the Islands are distinct from other studies. FIG maintain a local content code of practice. The Sea Lion SIA will detail employment mitigations and a Social Effects Monitoring and Management Programme (SEMPP) will monitor effects and determine appropriate management action throughout the development lifecycle.

Reference	Representation	Navitas response
	typically attracts large numbers of migrants to an exploitation area. The rapid influx of people and the higher relative salaries of oil project workers inflate the local prices of key goods and services, bringing about a significant increase in the cost of living, even for those who do not share in the benefits of an oil project (Karl, 2007) This effect is particularly visible in communities which have any presence of farming. Universally where oil is introduced farming activity, by employment numbers and production, falls significantly (Sigal, 2016).	
IND12 7	2.2 – Effects on health The effect of oil exposure in a nation for health is even more drastic. Presence of disabilities, both at birth and by injury, increase significantly – and offspring survival rate drops (Sigal, 2016). This has been shown to be the case even when controlling for levels of education and base levels of public healthcare in the area. The only exception for this is where oil is introduced in an area where there is a pre-existing range of private healthcare options in the area – and even in this case there is only a slightly less significant increase in proportion of disabilities by injury, and a less significant decrease in offspring survival rate, and in both cases, only for the highly educated and higher earners, (Sigal, 2016). It was also found that there were significant effects on the health of resident populations where oil is extracted, increasing the presence of various health complications, including asthma, bronchitis, asthma related complications, and lung-condition related deaths - for the United States resulting in a $77 billion direct cost in total health impacts (Buonocore, et al, 2023).	These effects noted in the publication referenced (Sigal 2016) do not appear relevant to the Sea Lion Phase 1 and 2 development in which oil is produced offshore and away from human populations. Potential impacts to human health will be considered further in the socioeconomic impact assessment.
IND12 8	2.3 - Noise pollution The Environmental Impact Statement (EIS) presents an analysis of the potential noise impact from oil activities in areas such as Berkley Sound, Stanley, and regions closest to the port. However, the data and	Noise surveys were undertaken to understand the baseline levels of noise around Stanley and Berkeley Sound, see section 7.7.5.1.1, as this is indeed a quieter soundscape than an urban environment. The sensitivity of the receptor (human population) is assessed as being

Reference	Representation	Navitas response
	assumptions underlying this analysis are fundamentally flawed. The studies cited in the EIS largely reference noise levels considered acceptable in urban environments—areas that already experience a significant degree of background noise. These studies fail to account for the unique context of the Falklands, where many areas, particularly those affected by the oil project, are rural with much lower levels of pre-existing ambient noise. The EIS does not adequately consider the heightened sensitivity of both the resident population and local wildlife to noise disturbances in these quieter, more natural environments. In rural settings like those around Berkley Sound and Stanley, even small increases in noise levels can have disproportionately large effects. The noise data provided in the EIS is not only inappropriate for the Falklands context but also risks severely underestimating the potential disruption caused by oil-related activities. Wildlife in these areas, which is accustomed to a relatively quiet environment, may experience significant stress and behavioural changes due to the sudden and sustained increase in noise. Similarly, residents who are used to low ambient noise levels could face considerable discomfort, sleep disturbances, and other negative health effects, which are not accurately reflected in the urban-centric studies referenced in the EIS. In the particular case of heavy vehicle noise, as has been better tested in regard to aircraft, ambient noise is usually dominated by road traffic noise and community noise (Fields, 1992). Fields suggests that levels of ambient noise may have little effect on reactions to aircraft noise. Nevertheless the responses from the focus groups in the study of Heaver (2002) and those of Diamond et al (2000) suggest that those in areas with high ambient noise level are less annoyed by an additional source than those in an otherwise quiet environment (Sanchez et al., 2015). Lim et al. (2008) concurred, finding that subjective responses to aircraft noise decreases with increasing background noise levels.	Moderate within the assessment and Navitas will conduct noise monitoring once into operations and monitor and respond to all complaints.

Reference	Representation	Navitas response
	In short, the data used to assess noise impact is not just inadequate—it is fundamentally misaligned with the conditions of the Falkland Islands. The EIS must take into account the lower baseline levels of ambient noise and the greater sensitivity of both humans and wildlife in these rural areas - and take into account the lower difference in noise level required to cause a stress response. Without this adjustment, the true severity of the noise impact cannot be accurately assessed, potentially leading to a gross underestimation of the environmental and social costs associated with the project. It is important to note that as this information is incorrectly founded, the effects can be severe. Once ambient noise levels exceed what a population are accustomed to, the health effects can be severe. Increased noise can lead to significant sleep disruption and psychological distress, which can, in turn, elevate the risk of cardiovascular problems and weaken the immune system. Studies have shown that in areas where there's a sudden and sustained rise in noise levels, the frequency of hospitalizations often increases due to these stress-related health impacts. A consistent increase in noise disturbances can have profound and lasting effects on community health and well-being (Mucci, 2020).	
IND12 9	2.4 - Lack of stability in post-oil scenarios The Environmental Impact Statement (EIS) fails to address the critical issue of what will happen to the Falklands in a post-oil scenario or during periods of oil market instability. The EIS overlooks the potential long-term risks associated with becoming heavily reliant on the oil industry. History has shown that when regions or industries become dependent on oil, they are vulnerable to severe economic disruptions if oil reserves dwindle, if there are fluctuations in global oil prices, or if the industry declines for other reasons. A downturn in the oil market can lead to widespread job cuts, leaving many people unemployed and leading to a range of social issues, including increased homelessness and poverty as has been seen in	Such effects are outwith the scope of the EIS - potential impacts on employment and quality of life will be considered further in the socioeconomic impact assessment. The Social Effects Monitoring and Management Plan can monitor potential impacts throughout the Phase 1 and 2 development lifecycle.

Reference	Representation	Navitas response
	Aberdeen and other cities which developed an oil reliance. Businesses that thrive during the oil boom may struggle or close down entirely when the industry contracts, resulting in a loss of economic diversity and resilience. Additionally, infrastructure investments made to support the oil industry may become underutilised or abandoned, leading to a deterioration of public assets and a further strain on government resources. The domino effect of an economic downturn in a post-oil scenario can be devastating, with negative impacts spreading across various sectors and deeply affecting the community's quality of life. The EIS does not adequately consider these risks or propose strategies for mitigating them. While it may be challenging to fully predict and plan for a post-oil future, it is essential that the government takes a cautious and forward-looking approach, ensuring that the Falklands is not left vulnerable to the boom-and-bust cycles often associated with oil dependency. The potential consequences are too significant to ignore, and a more robust plan is necessary to ensure long-term stability and sustainability for the Falklands	
IND12 10	3) Falklands Government functionality 3.1 - Global perceptions of the Falklands The Falkland Islands have long marketed themselves as a place where "nature is still in charge." This branding is not just about attracting tourists who come to experience the unique wildlife, including penguins, seals, and whales, but also plays a crucial role in the Islands' political narrative on the global stage. The Falklands are presented as responsible custodians of this part of the South Atlantic, committed to preserving the natural environment for future generations. This image is integral to the Islands' efforts to garner international support for self-determination, particularly during engagements with the United Nations and other global bodies. By positioning the Falklands as a region that prioritises environmental stewardship, legislators have successfully leveraged this perception to build political alliances and	Thank you for your comment. This is noted. However, it is not Navitas' to comment on FIG policy and approach to public diplomacy.

Reference	Representation	Navitas response
	strengthen the case for maintaining autonomy. However, the development of oil and the associated environmental risks could seriously undermine this carefully cultivated image. The global perception of the Falkland Islands as a pristine, environmentally conscious region is at risk of being tarnished by the realities of oil extraction and the environmental impacts that accompany such activities. If the project proceeds without adequately addressing these concerns, it could damage the Falklands' reputation, leading to a loss of credibility in both tourism markets and international political arenas. Moreover, any negative environmental outcomes could diminish the appeal of the Falklands to eco-conscious travellers, which would have direct economic consequences. This would not only affect the tourism sector but also weaken the Islands' ability to use their environmental record as a tool in political diplomacy. It is essential that these potential impacts on global perception are given serious consideration in the Environmental Impact Statement, as they could have long-lasting effects on the Falklands' economic and political standing.	
IND12 11	3.2 - Public infrastructure support and wider functionality The development of the oil industry in the Falklands is likely to introduce significant challenges to the functionality of the Falklands government, particularly in terms of public infrastructure support. One key concern is the increased use of the air bridge between the Falklands and the UK. With oil-related activities increasing demand for air travel, there will likely be longer delays for government officers travelling to and from the Falklands. These delays could hinder the efficiency of government operations, reducing the ability of officers to respond promptly to critical issues. Moreover, the longer and less reliable travel times may deter potential recruits from moving to the Falklands, as well as dissuading current residents from staying, exacerbating the challenges of maintaining a skilled and stable workforce within the government. In addition to the strain on travel infrastructure, the oil industry will	Thank you for your comment. This is noted. However, it is not for Navitas' to comment on matters regarding FIG policy and infrastructure investment.

Reference	Representation	Navitas response
	place an additional burden on the Falklands' already strained public works sector. The increased use of roads for transporting oil-related materials and personnel will accelerate the wear and tear on the road network. Given that the road works team within public works is already operating at maximum capacity, this added pressure will likely lead to delays in essential road maintenance and other public works projects. The ripple effect of these delays could extend to other critical infrastructure as previously mentioned, such as electricity, water access, fuel and bunkering, housing, and healthcare services, all of which are already facing capacity challenges. The EIS does not fully address these potential impacts, which could severely compromise the government's ability to maintain and develop the infrastructure necessary to support both the oil industry and the wider community.	
IND12 12	4) Method of consultation of EIS I would also like to make known my significant concern in regards to the Non-Technical Summary and the presentation of this document. While I understand the necessity of simplifying information to increase likelihood of responses by members of the public, I feel that the document overly condenses and simplifies various areas and at times even downplays areas of significant risk with the possibility of misleading stakeholders and members of the public who may not have time to read the large complete EIS. While there is little specific response that can be made in regard to this, I would urge that legislators and officers thoroughly consider the high barrier for complete responses which exists for members of the public in regard to the EIS, as almost all but those who would have professional capacity and reason to read the complete EIS; or those who have no significant professional or personal time commitments, would have time to review and respond to the complete EIS. This being the case, I would urge that Legislators in particular consider	Navitas followed FIG EIA guidance on the Public Consultation process.

Reference	Representation	Navitas response
	the views of their electorate when considering the EIS and it's responses - and do their best to imagine the views of the electorate who may be effected in the future by the decision to pursue hydrocarbons, and would not have had the opportunity to respond to this document, either due to capacity, age, commitment, or fear of negative consequences from their employer or future prospective employers - especially due to the heavily politicised view which is taken of anti-oil stanced individuals.	
IND12 13	5) Acceptability of risk While I do not claim to have expertise in environmental science, biology, or related fields, I am deeply concerned about the lack of attention given to what is considered an acceptable level of risk by the government. The Falkland Islands have long been promoted as a place where nature is in charge, a region that values environmental stewardship and care for its unique ecosystems. Given this, I strongly believe that the burden of what is deemed an acceptable level of environmental risk should be extremely low. The EIS, however, proposes risk levels that range from moderate to high, which are simply not acceptable by any reasonable standard for a place that prides itself on environmental preservation. These mixed moderate, upper moderate, and high-risk assessments should not be allowed to progress unchecked. It is vital that the government upholds the principles of environmental care that have long been associated with the Falklands. Allowing such significant risks to move forward would not only undermine these values but could also lead to irreversible harm to the very environment that the Falklands has committed to protecting.	Thank you for your comment. This is noted. Navitas followed a robust EIA methodology (Chapter 8) and applied the precautionary principle in accordance with FIG EIA guidance.
IND12 14	Conclusion In conclusion, I believe that the proposed oil drilling project is ill advised from a social perspective, environmental perspective, and from the perspective of the functionality of government. I also believe that it would be completely misaligned with the Falklands Government goals and responsibility of the Falklands Government and people to contribute to the global environment and - as the Islands Plan states: "reduce our	Thank you for your comment. This is noted. However, it is not for Navitas to comment on FIG policy.

Reference	Representation	Navitas response
	carbon emissions in order to ensure we act as a responsible global citizen.”	
IND13 1	Response to the public circulation of the Navitas Petroleum Environmental Impact Statement Thank you for the opportunity to comment, I do so having acute regard for over 4 decades of personal time spent lobbying for the opportunity, which thankfully now lies within grasp. Let us not be blind-sided by a biased environmental rant, sans substance. 30 years ago following due public consultation, FIG launched the first oil licensing round in London. There were no dissenting voices, and even Falklands Conversation, then present, did not express objection. In May 2010, Rockhopper Exploration discovered the Sea Lion field. It has taken 14 years to embrace the real possibility of an emerging new industry; it is a once-in-a-generation opportunity. The Sea Lion Environmental Impact Statement (EIS) issued by Navitas Petroleum for consultation, requires responsible consideration of the opportunities, risks and impacts, both positive and negative. The EIS is in accordance with the Islands Plan 2022–2026, that states “This Assembly will… progress extractive industries in an environmentally conscious way.” The EIS recognises other relevant FIG policies involved in decisions making and consultation, include those charged with protecting the environment and biodiversity, and climate change. In the Falklands, especially across the rural communities, we all see the impacts of global climate change. We all have our part to play in combating this, through restoration, and the development of Sea Lion will provide the financial resources to fast track land management, best scientific led bio-diversity restoration, and healing of the landscape. The inconvenient reality is that oil has to be a declining part of the energy mix during the Energy Transition in the coming decades. We use oil to fly to and from the Falklands, heat and light our homes, fly FIGAS to boost tourism, take winter vacation, encourage marine tourism, drive vehicles and power fishing vessels, cargo and cruise ships. It is	Thank you for your comments.

Reference	Representation	Navitas response
	hypocritical therefore, for anyone, and especially Falklands Conservation, to state that whilst we use oil, it should be produced elsewhere, often with lower environmental and ethical standards, by corrupt and dictatorial regimes. Without an air bridge and UK land, sea and air security commitment to the Falklands, we would soon become an irksome remnant of a bygone era. Having lived through the Falklands darkest economic times with little future potential, I cannot recommend any return to such an era. The EIS has identified the risks, and mitigations, with few residual planned negative impacts. This is because oil development is mainly a contained, sub-surface activity. The biggest risks are from unexpected incidents. A modern, high quality development will minimise the risk of such an event. The EIS mitigations show that this can be done. As an example, the likelihood of oil beaching in the Falklands is assessed as 'Low'. The industry will bring with it sea and air units to daily underpin any risk which might surface, and commitments to call in the mobilisation of time critical international resources in the unlikely event of spillage. No other industry, working within the Falklands environment, provides such safeguards. Risks of development are recognised and managed elsewhere, as in the UK, which has 120 producing oil sites, including new sites under development, and from where the Falklands has modelled its offshore Health, Safety and Environment legislation. Even environmentally conscious Norway, has 90 oil-producing sites, and an unimaginable sovereign wealth fund to prepare for the future without fossil fuels. For risk of development to be acceptable in the UK, then it should be acceptable in the Falklands. We have one environment, which we need to protect, but also we desperately need to restore the terrestrial element of our environment – it should not be a simplistic excuse, as Falklands Conservation posits, not to sustainably develop our economy for the benefit of future generations health, wealth and education, and land restoration. We have a duty to promote, protect and nurture our environment. For some years, I have been in the field restoring Falklands' habits and trying	

Reference	Representation	Navitas response
	to reduce the loss of peat land, and the only party to have undertaken a first and only ground-truthing survey in one sector of the Falklands. The rural community, called Camp, leads by example having invested substantially in renewables, significantly reducing fossil fuel use. Stanley will energy transition over some years with weighty reserves cost implications. The Falklands are fragile in many ways. Nationally we have experienced the severe financial and social impacts of the long-term decline in the Falklands' historically dominant sector, wool producing. Responsibly, the Falklands needs to diversify its economy. We cannot rely forever on maintaining current financial reserves – they stand to dwindle. Our standard of living and the services we currently enjoy, substantially depend on a single, underpinning activity, fishing. Fishing also has a significant impact on the marine environment. FIG scientifically monitors the fisheries and makes fishery management decisions. Many of the risks in the EIS also are relevant to existing marine activities. Nationally we will be able to educate, train, and employ future generations of home- grown environmentalists, naturalists and future land managers, from an oil industry, which hitherto has not been possible due to lack of commitment and finance. Investing in home-grown talent, educated in our current restricted setting, pursuing further education in the scientific arena, fills a waiting vacuum. Today's students should become our scientific advisors of the future. Political lobbying for the Falklands to have its oil and gas regime commenced decades ago. Let us not cast aside prior strategic thinking and vision done at that time, and our nation's economic future, because of some pseudoscience pedalled by Falklands Conservation. **REDACTED**, I interpret its 57-page response as nothing short of a rant, whilst on the other hand it annually has arms gleefully outstretched to receive tens of thousands of £s, of taxpayers funded subvention. Double standards, worthy of public criticism, if not a PAC review. Some years ago the Falklands bunker supplier revealed that >1million tonnes of marine diesel had been transferred in Berkeley Sound, this figure fell short of including all transfers for reefer and jiggers for prior	

Reference	Representation	Navitas response
	decades. It is therefore wrong of Falklands Conservation to finger the Sea Lion development assets as having the only capability of striking a whale. The Falklands has a National Oil Spill Contingency Plan (NOSCP), but on page 10 of the Falklands Conservation response, oil spills only get one paragraph out of 57 pages! The NOSCP is based on being proportionate to the risk, and at the moment, does not consider oil production, so to make reference to it as Falklands Conservation has done, is misleading or at best, naïve. The Falklands equivalent to the Merchant Shipping Act already provides the basis for a Falklands equivalent to the UK SOSREP with the powers of intervention - but why bother mentioning that when Falklands Conservation appear unaware of Chapter 4 of the Ordinance: Liability for Oil Pollution, or Chapter 5: International Oil Pollution Compensation Fund. To say the EIS is not fit for purpose, reckons with a biased ranting response, which does not even name the author(s). Fast-forward from 1995, we are fortunate to be able to comment on this development EIS in a transparent way. I endorse the well thought through EIS and its focus on delivering the best mature environmental protection against known and likely risks to enable development, while delivering a sustainable future for upcoming generations across both our terrestrial and marine environments.	
IND14 1	Response to Environmental Impact Statement: The Sea Lion Field Northern Development Area As an member of public I am writing to express my profound concerns regarding the Environmental Impact Statement (EIS) for the Sea Lion Field Northern Development Area. As an individual and a Marine Biologist with extensive experience at sea, I have briefly reviewed the EIS and found several critical issues that I believe warrant immediate attention. 10.4.4.3.2.1 Fish hearing thresholds The EIS appears to have been finalized prior to the publication of critical research that directly relates	Thank you for your comments, the underwater noise chapters are being revised and Navitas will be sure to review the paper suggested. See FIFD 54.

Reference	Representation	Navitas response
	to the project's potential impacts. Specifically, paper Anthropogenic noise disrupts early-life development in a fish with paternal care - ScienceDirect, presents findings that were not considered in the EIS. This study indicates that anthropogenic noise can lead to a decrease in egg number and a reduction in yolk sac size in fish. These findings have direct implications for fish populations, particularly in sensitive habitats such as those around the Falkland Islands. The observed effects in the study- namely, reduced egg numbers and smaller yolk sacs- suggest significant developmental disruptions that could impact fish survival rates and population dynamics. Such disruptions are particularly concerning for species with critical early-life stages and could exacerbate the adverse impacts on fish populations predicted in the EIS.	
IND14 2	1.7.3.1.1 Direct offsetting: The EIS outlines various options for offsetting but does not specify a clear, actionable plan for addressing the carbon emissions resulting from oil extraction, production, and combustion. Given the significant carbon footprint that the project will likely contribute-particularly in the context of the Falkland Islands' relatively high per capita emissions-it is crucial that a definitive strategy for carbon offsetting be established. Considering the Falkland Islands' remote location and limited resources, offsetting measures may indeed be challenging. Without a clearly defined and robust plan for compensation, the environmental impact of the Sea Lion oil field could be substantial. It is essential to have a detailed, written commitment to offsetting that includes calculations and strategies tailored to the unique circumstances of the Falkland Islands. The EIS includes examples such as reforestation in nearby areas where construction has cleared trees. We are clearly not talking of Falkland Islands and EIS is clearly lacking seriousness and commitment for offsetting. Specific, context-appropriate offsetting strategies should be developed rather than relying on generalized examples that may not	Thank you for your comment. This is noted. The example of reforestation provided in EIS section 8.11.2.1 was not intended to refer to the Falkland Islands, it was included to provide an example of what would constitute direct or 'like for like' offsetting. Please also refer to the response to comment IND 11 7.

Reference	Representation	Navitas response
	address the unique environmental and logistical challenges of the region. Given the lack of a clear and actionable plan for offsetting, and the specific challenges posed by the Falkland Islands' remote location, I recommend that permission for the Sea Lion oil field extraction and further oil exploration be put on hold until a comprehensive and feasible offsetting plan is developed. This plan should include detailed calculations and strategies that are specifically tailored to the conditions and capabilities of the Falkland Islands.	
IND14 3	Spatial Overlap with Fishing Licences: The proposed Sea Lion oil field is situated within the geographical boundaries of fishing areas designated under B licence.	Thank you for your comment. This is noted and is discussed in Section 7.7.3.1.1.1, which details the fishing activity within that licence and notes the low levels of fishing in the area and the specific square in which Sea Lion is located.
IND14 4	And finally, I would like to express a significant concern regarding the Falkland Islands preparedness for potential accidents related to oil exploration. The remoteness of the Falkland Islands, coupled with their limited resources, raises serious doubts about the ability to mount a prompt and adequate response in the event of an environmental incident.	Navitas has prepared and submitted its preliminary (Pre-FID) OPEPs to FIG for their review and approval. These shall be finalised prior to the commencement of operations. Navitas is proactively committed to mitigating the risks of such an event from occurring. Navitas Petroleum Development and Production Ltd. (formerly POEPL) has invested significant resources in understanding Sea Lion crude behaviour and the metocean environment in order to predict the potential impacts on wildlife and inform optimum spill response equipment. Extensive Tier 1 and Tier 2 response equipment has been specified and will be available on the support vessels, and stored in the Supply yard. Tier 3 Spill Response will be supported by specialist oil spill and wildlife response agencies with resources (equipment and manpower) available to respond at very short notice. The oil spill response arrangements are not reliant on the NOSCP and associated resources. The preliminary OPEPs have been prepared in order to interface appropriately with the NOSCP (as required and stipulated in the NOSCP) and Navitas has committed to regular engagement, training and joint spill response exercises with FIG to ensure that a spill response can be effected appropriately.

Reference	Representation	Navitas response
RSPB 1	SEA LION FIELD DEVELOPMENT PHASES 1 & 2, ENVIRONMENTAL IMPACT STATEMENT (EIS) 2024 CONSULTATION RESPONSE The RSPB welcomes the consultation offered by the Falkland Islands Government and offers comments with the aim of contributing to the shared objective of environmentally sensitive economic development. We offer these comments from the perspective of UK and international policy. This contribution builds upon RSPB consultation responses to oil Environmental Impact Assessments in the Falklands over several decades. The RSPB's view is that, due to the five reasons outlined below, the EIS is insufficient to currently meet the standard of an environmentally safe development and should be resubmitted once FIG's more robust planned governance framework is in place. The comments outlined below are not exhaustive.	See responses below.
RSPB 2	1)The proponent's baseline data survey work has major shortcomings a)The incorporation of new pinniped and avian data is welcome. This helps narrow risk and current uncertainty in impacts upon vulnerable seabird and marine mammal populations. It helps identify the presence of a number of species. However, it is our view that inadequate effort has been made between the exploration and extraction applications to survey offshore baseline ecological data on birds and cetaceans. It remains hard to understand why these known gaps could not have been filled by the proponent in the time available.	Navitas disagrees that the baseline data survey work has major shortcomings. The RSPB comment suggests that additional data should have been gathered in the time available between exploration and extraction. Navitas Development and Production Limited, formally POEPL, has invested considerable resources both independently and via the industry-FIG funded 'GAP' project to acquire and analyse data, including seabird and cetacean data, to inform the baseline. While some of this data was available in time to inform exploration Environmental Impact Assessments, it was not commissioned for the exploration stage, but was commissioned specifically to inform the baseline for the purposes of the development impact assessment. While the Seabirds at Sea dataset is old, this has been anlaysed alongside and is complemented by other more recent data and the data is considered valid for the pruposes of the risk assessment. There are some data gaps in the SAST dataset, which are acknowledged in the EIS. FIG EIA Guidance states that 'the applicant should not be accountable for data gaps that could

Reference	Representation	Navitas response
		not reasonably have been filled, but more for the way in which they address the gaps in the risk assessment' and where there are data gaps a risk may be increased to reflect the higher level of uncertainty. To update the seabirds at sea dataset would require a multi-year, multiple vessel survey effort across the entire Falklands offshore area. It is considered that this is beyond the scope of an individual operator. The EMMP Workshop considered the (post-regulatory approval/project sanction) data acquisition, monitoring and management requirements at all stages of the project life-cycle. The workshop concluded that it would be useful to collect further [seabird] data opportunistically from vessels associated with the Sea Lion development, but that a wider data collection effort to update seabird information was beyond the scope of the EMMP.' It was also decided in the EMMP workshop not to monitor seabird populations ashore 'due to the difficulty of attributing any change to activities in the Sea Lion field.' Despite it being suggested by the EMMP workshop that a wider [seabird] data collection effort was beyond the scope of the EMMP, Navitas has committed in the EIS to collaboration with FIFD in this regard post sanction (Section 10.1.10.1).
RSPB 3	b)Surveys in the 'zone of influence' –a key concept in EIA – are important. Wider tracking data for species is helpful to help build a partial picture. However, this is not a substitute for rigorously designed surveys. In the North Sea, offshore windfarm developers are expected to provide comprehensive data on bird distribution and movements (as well as data on other animals' distribution and movements) over a two-year period and often over potentially very large areas, prior to submitting consent applications. Developers typically undertake offshore distribution and movement pattern surveys, often at considerable cost. This is done so ahead of project approval, with full knowledge of	The context here is that the Sea Lion field is the only one in the Falklands Islands that is currently being looked at for development and it is not reasonable, practically or financially for a single operator to undertake this work in isolation. This work is more appropriate for a collaboration of industry and FIG. Navitas Petroleum Development and Production Limited (previously POEPL) has invested considerable sums in data gathering alongside investment in the GAP project.

Reference	Representation	Navitas response
	potential associated risks to that development. The need for up-to-date baseline data is also a required under North Sea oil EIA regulations (Statutory Instrument 2020 No. 1497). c)One of the principal reasons for the recognition of the need for up-to-date survey work is that evidence from around the world suggests that seabird populations are changing in their distribution and abundance, including in the sub-Antarctic1. Given the global importance of this marine region to seabird populations, and potential risks from oil developments, similar data would be expected to be presented.	See also response to RSPB 2.
RSPB 4	d)We commend the use of precautionary risk categories. However, the use of these categories has limits if rigorous and up-to-date baseline information fails to be presented. These data gaps ensure there is unnecessary uncertainty regarding the significance of impact on receptors. Consequently there is insufficient confidence in the targeting and efficacy of any mitigation measures that are proposed for individual species that may have different behavioural or lifecycle characteristics e.g. are they vulnerable to light pollution, do they form seasonal local aggregations etc..	The assessments in in the ES are precautionary and the consider gaps in data. Under FIG's guidance (FIG, 2016) the applicant should not be accountable for data gaps that could not reasonably have been filled, but more for the way in which they are dealt with in the risk assessment. Therefore the presence of justifiable data gaps does not make an EIS unfit-for-purpose, as long as these are acknowledged and explained and indeed a precautionary approach is taken.
RSPB 5	e)A compounding concern is that much of the North Falkland Basin east of the drill site has no SAST data in sensitive months, a significant data gap, particularly when considering impacts from possible spill events.	Thank you for the comment. This gap is acknowledged in the document. Note that Navitas will deploy SMMOs on vessel operating in and from the field for a period of three years pre-first oil.
RSPB 6	f)Best practice Environmental Impact Assessment, for example presented by the UK Government2, considers the use of baseline data gathering once consent has been given, or as part of a 'consent condition' to be poor practice. This would include the deferral of baseline data collection to the Sea Lion Environmental Monitoring and Management Plan. This has the potential to put decision makers in a difficult position as engineering plans are advanced, leverage is reduced and development plans therefore less likely to be altered later as the costs would be potentially much higher. g)It is therefore our view that the avian data presented does not allow FIG to make sufficiently informed decisions on potential impacts and therefore methods of possible mitigation of impacts in engineering or operational procedures.	See response to comment RSPB 2, 3, 4 and 5.

Reference	Representation	Navitas response
RSPB 7	2)Carbon emissions from unabated development of the Sea Lion field a)The International Energy Agency has highlighted the risk of new long term oil developments to the safe limits described in the UNFCCC Paris Agreement: To align with a 1.5 °C scenario, these [industry] emissions need to be cut by more than 60% by 2030 from today's levels and the emissions intensity of global oil and gas operations must near zero by the early 2040s. [...] In a scenario that hits global net zero emissions by 2050, declines in demand are sufficiently steep that no new long lead-time conventional oil and gas projects are required3. b)The estimated unabated carbon emissions outlined in the EIS are approximately 9 million tonnes from production and >111 million tonnes from combustion of the oil. Extraction is proposed to extend beyond 2050, the deadline for net zero. This, alongside the lack of credible offsetting plans (see below), ensure that this development is not compatible with environmentally safe development. c)The proponent has publicly stated a desire to further develop the basin with no mention of emission abatement plans4. If this were to happen unabated, the unfavourable emissions scenario would be significantly compounded.	The subject of emissions is transparently and extensively detailed in Section 10.9 of the EIS. Navitas is committed to exploring opportunities to further reduce its emissions; an example of this is the Emissions Reduction Action Plan (ERAP) for the Floating Production Storage Offtake (FPSO) vessel during the Front End Engineering and Design (FEED) project. Navitas also commits to seeking further emissions reduction initiatives throughout the life-cycle of the Sea Lion Field. EIS Section 10.9.4.4.4 notes that currently expected emissions from Sea Lion are 18.24kgCO2[e]/boe. This section also notes that 'when the personnel transportation, drilling and vessel emissions are excluded to enable like-for-like comparison with UKCS emissions reported to the NSTA, the carbon intensity is estimated to be 14.4 kgC02[e]/boe (section 10.9.4.5.4).' Consequently, Sea Lion will bring oil to market at a carbon intensity lower than the UK average for an FPSO (36 kgCO2e/boe for FPSOs of 11-25 years of age and 20kgCO2e/boe for FPSOs of 0-10 years old), indicating that the development is comparatively efficient. This is without the additional emissions reduction measures that will be considered in Front End Engineering Design (FEED) and the Emissions Reduction Action Plan (ERAP). Were the development not to be sanctioned, oil would be sourced from the international market from existing, declining fields with a likely higher carbon intensity. With regards to offsetting, Navitas is committed to offsetting significant impacts. Local offsetting will be prioritised over international schemes. Carbon and biodiversity offsetting opportunities require further evaluation and research to define the level of offsetting that can be achieved locally. Navitas' offsetting strategy has been detailed in a paper which was issued to FIG in August 2024; this will be further discussed and agreed with FIG

Reference	Representation	Navitas response
		and will be consistent with FIG legislation, policy and guidance. Navitas does not consider it is possible to give more information on credible potential offsetting plans with a path to physical delivery, including pilot projects, until further research has been undertaken. EIS section 8.11.2.2 states that at this stage it has not been possible to develop potential indirect offsetting projects to the level of maturity required by the EIA guidance, and it cannot make ad hoc commitments to indirect offsetting projects that are not fully understood. 8.11.4 states that 'As feasibility of various potential operator-led direct and indirect offsetting initiatives cannot be confirmed prior to research, analysis and development, Navitas is not in a position to specify offsetting required by the 2016 FIG Offsetting Guidance at this time. Given this, Navitas will initiate a Falklands-specific fund which will initially address and inform the feasibility of large scale carbon and biodiversity offsetting through commissioned research and investigation. It is intended that following this feasibility stage, Navitas will provide funding to the viable projects identified in order to discharge its offsetting obligation.' Note that some potential indirect offsetting initiatives are indicated at 8.11.2.2 but this list is not exhaustive. It is not clear at this stage which of these potential projects would achieve the greatest environmental benefits. Furthermore, at the scale required to achieve meaningful offsetting, these projects may require environmental and socio-economic impact assessment in their own right. The majority of the land in the Falkland Islands is in private ownership, so landowners will need to be content to embrace the offsetting projects proposed. It is difficult to contemplate that landowners can commit to supporting such offsetting initiatives prior to regulatory approval and sanction of the project and prior to there being additional clarity on the environmental benefits such projects will achieve. For these reasons, it was not possible to confirm offsetting initiatives at this stage.
RSPB 8	3)Bird strike a)The EIS states (p.605): The Sea Lion Development is 220 km offshore, in an area that supports relatively low seabird densities throughout the year, and therefore it is not considered likely that multiple bird strikes will occur on a regular basis. It is our view that the avian survey data has	a) Although there are some temporal gaps in the SAST Navitas believe that it has been precautionary in the risk assessment. Diurnal albatrosses and petrels (i.e. active during the daytime) are less likely to be involved in light induced bird-strikes than birds that are active at night.

Reference	Representation	Navitas response
	not been presented to allow the proponent to ensure this statement's veracity (see above). b)The category of 'low' sensitivity of the seabird receptors impacted by artificial light and flares would therefore be unable to be verified. c)The EIS suggests that With regard to the likelihood of a multiple bird-strike event occurring, such a strike is likely to occur less than once per year but more than once in 10 years (p.606). Again, our view is that the data presented are insufficient to be able to make this statement with reliability and therefore the planned mitigation are potentially unreliable. d)Species that are listed as potentially susceptible to bird strike (section 10.1.4.3.1.4 p.599) have not been surveyed at the field site and data presented do not substitute for well-designed surveys that would test for bird strike susceptibility as is found in survey work for offshore wind in the North Sea when conducted to high standard. e)The EIS states that Navitas has limited control over third-party vessels (table 10.6) and proposes minimal stipulations in relation to bird strike. All contractors should apply relevant standards as part of the development. Good practice would see this built into contracts. f)Where insufficient data is available and considering this region is of global significance for seabird populations, good practice would assume a precautionary approach. However, the proposed mitigation measures presented offer few investments beyond industry standard practice. Few Innovative proposals for mitigation are made. These should include the use of radar, modified protocols during high risk periods at key times of the year, Clear sky lighting and other proven methods to reduce the impacts of the development, all part of a structured and internationally expert-reviewed plan.	b) The low sensitivity refers to sea birds that will be vulnerable to light at night – for example prions etc. Most of these are listed as 'least concern' under the IUCN red list. c) Thank you for the comment. Our assessment is based on evidence available and the likely taxa affected. The area will be surveyed post sanction and 3 years prior to first oil and the data generate here will improve Navitas' Bird Strike Action Plan. d) See response in c). Note that further data will be collected by SMMOs in the field three years pre first oil.The EMMP workshop concluded that 'a wider data collection effort to update seabird information was beyond the scope of the EMMP.' The context here is that the Sea Lion field is the only one in the Falklands Islands that is currently being looked at for development and it is not reasonable, practically or financially, for a single operator to undertake this work in isolation. This work is more appropriate for a collaboration of industry and FIG. Navitas has indicated its desire to collaborate with FIFD to collect area wide multi-year data - see section 10.110.1. e) With the exception of the CTT's, third party vessels on direct hire to the Sea Lion development will be part of the Bird Strike Action Plan with monthly bird strike reports sent to FIG. Lighting on vessels will be outwith Navitas' control and will be governed by safety regulations, although all in-field vessels will be asked to optimise lighting and utilise on site mitigations e.g. black out blinds etc. f) Thank you for the comment. Navitas will develop a Bird Strike Management Plan for all operations in Berkeley Sound and at the Sea Lion Field. Navitas has committed to exploring whether further mitigations can be applied during Front End Engineering Design, but as these project specific mitigations cannot yet be confirmed they have not been factored in to the residual impact assessment.

Reference	Representation	Navitas response
RSPB 9	4)Carbon and biodiversity offsetting proposals are not yet viable a)The proponent has put forward possible options in relation to offsetting carbon and biodiversity impacts under various scenarios. However, as freely identified in Table 8.9 (p.552) the plans are not sufficiently advanced to be able to show viability. b)FIG's Hydrocarbons Environmental Impact Assessment Guidance states that Whilst the EIS is not itself necessarily the basis for implementing or enforcing the mitigation, it should demonstrate that the proposed mitigation is realistic 5 . The proposals do not fulfil FIG's standard currently. This critical part of the EIS appears to have been presented prematurely.	Offsetting is the final step in the mitigation hierarchy. Navitas is committed to offsetting significant impacts. FIG guidance requires local offsetting to be prioritised over international schemes. Carbon and biodiversity offsetting opportunities require further evaluation and research to confirm viability and define the level of offsetting that can be achieved locally. This feasibility stage is underway, but requires data acquisition over a number of years. Where direct offsets are not available, Navitas will undertake indirect offsetting (EIS section 8.11.2.2). Navitas' offsetting strategy has been detailed in a paper which was issued to FIG in August 2024; this will be further discussed with FIG and will be consistent with FIG legislation, policy and guidance. See also commentary on offsetting in response to RSPB 7.
RSPB 10	5)FIG's planned environment regulation regime is incomplete and therefore not yet 'oil-ready' a)FIG has recognised the need to improve regulation for the environment in order to secure safe standards of environmental governance and to address potential conflicts of interest as would be found in other jurisdictions such as the UK. b)In 2013 ExCo approved plans to separate the environmental regulatory function from the licencing function to avoid any potential conflicts (ExCo paper No. 70/13). This function is separate in the UK's North Sea regime. Whilst there is currently no evidence of any real conflict arising between licensing and safety regulation there are potential conflicts of interest between these functions, and most modern oil regimes separate the regulation of licensing/production from the regulation of safety and environmental matters (indeed in other regimes separation of these functions has followed major safety incidents (Piper Alpha in the UK and Macondo in the USA)). […] The Islands would be wise to learn from this experience and avoid some of the mistakes made elsewhere. This will ensure that the inherent conflict of interest between issuing economically and commercially valuable production licences and the approval of safety and environmental practices is avoided, and will better ensure the protection of the unique environment of the Islands and the safety of its inhabitants and transient workforces6.	Navitas notes this comment. Navitas expects FIG to address responders' comments on legislative matters separately.

Reference	Representation	Navitas response
	c)This recommendation has not been completed. The licencing authority is now considering the approval of the EIS. Arguably the licencing authority is now faced with this potential conflict. d)In the same paper there was the following commitment: That ExCo confirm that new legislation and guidance is needed to compel operators to submit an 'Environmental Case'. This recommendation has not been completed. e)In 2020 ExCo paper 97/20 noted The wider Falklands environmental regulatory framework has been noted as a concern for the UK Government in relation to the offshore Sea Lion development; and there is a need to demonstrate substantial progress regarding a number of items of legislation including the CWNO [Conservation of Wildlife and Nature Ordinance] in advance of project sanction. […] The FI wildlife legislation is dated and inappropriate for the globally significant wildlife supported by the Islands and includes little guidance for dealing with breaches. As the EIS correctly points out there are no equivalent 'Disturbance licences', so it is difficult for developers to know what the next steps are to be compliant with legislation and policy. f) In 2017 ExCo approved plans (ExCo paper 5/17) to put in place a 'polluter pays' law: The proposed legislation seeks to extend the focus of those onto prevention as well as remediation by placing an obligation on operators to take necessary steps to prevent environmental damage, and giving FIG suitable powers to issue specific directions. This is in line with the UK Environmental Damage (Prevention and Remediation) Regulations 20157. This recommendation has not been completed. g)If FIG logic is to be followed, the environmental governance framework is not yet sufficiently complete to approve the current EIS to a sufficiently safe governance standard.	
SEAFISH 1	Discharge of drill cuttings – Looking for reassurance that this activity won't interfere with squid – what is the previous relevant literature in this area? It would be helpful to show the discharge of cuttings from the drilling and their spread across the seabed.	Navitas do not anticipate any impact from drill cuttings on squid life-cycles. As indicated in Section 10.6 the footprint of the cutting piles if very small in comparison to the extent of the habitat available. Further, spawning grounds for illex are off the southern coast of Brazil and the eggs are pelagic. The impacts of drill cuttings and discharges on fish and squid are captured in Chapter 10.6.4.2.5.

Reference	Representation	Navitas response
SEAFISH 2	Mobile Offshore Drilling Unit – The scale of the necessary exclusion zone around the FPSO and associated underwater infrastructure is not clear. There is a 500m zone and a 1,275m zone referenced, but also references to other items at the site that require exclusions zones as well. A map outlining the total area that will be closed to fishing vessels would be ideal.	Section 5.4.3 on the MODU makes reference only to the 500m exclusion zone around the MODU Section 5.5.4 on the arrival and positioning of the FPSO makes reference to the 1,275m exclusion zone around the FPSO Section 11.1.2.2 on Disturbance to other users provides a figure showing the combined offshore exclusion zones. Navitas is unclear as to where the confusion lies. A 500m exclusion zone is required around the MODU whilst drilling. A similar 500m zone is upheld for the SURF vessels whilst they are completing their workscopes. Once the FPSO is in steady state production a 1,275m exclusion zone will be established. The increase in distance is required as it covers a greater amount of subsea infrastructure to that of the MODU or the SURF vessels. Notices to Mariners will be issued each time the MODU moves and once the FPSO is located. Navitas has also committed to working closely with FIMA and regularly advising FIFCA. A field detail (albeit not to scale) is included in Section 1.4, this provides a detail of how the surface and seabed will look in steady state production. Charts with the Sea Lion Field infrastructure and offshore assets will be provided to other users of the sea prior to operations commencing. Please also refer to the response to FOR 3.
SEAFISH 3	How is the size of the offsetting fund set, is there a risk that Fisheries are asked to contribute to this in the future? Is there any precedent for this happening in other jurisdictions?	Navitas issued its Carbon & Biodiversity Offsetting Fund strategy to FIG in August 2024. The size of the offsetting fund will be agreed in conjunction with FIG. Navitas has specified that this fund will be related only to the Sea Lion field. Previously FIG's proposed Environment Fund was designed by FIG in consultation with stakeholders with the view that it could service offsetting contributions /ambitions of industries beyond oil and gas in future. Any regulation requiring broader industry contribution is a decision for FIG, consequently Navitas cannot offer any further comment on this matter.

Reference	Representation	Navitas response
SEAFISH 4	How are the international tankers that collect the oil for export regulated and what is the risk level of an accident with one of them in or around FI waters? What routes will they be using for transit in FI waters?	Thank you for your comment. Tankers are vetted according to the criteria noted in section 5.10, which includes (but is not limited to): - Compliance with MARPOL 73/78 - Validity of SOPEP - Compliance with IMO Ballast Water requirements - Biofouling management - All CTTs must be double-hulled - Must be equipped with 8 wire mooring lines on fixed drums - The CTT will have aft towing bits with a minimum 80 tonne SWL (Safe Working Load). - Will have an amidships crane with minimum SWL of 15 T with a 4.5 m outreach; - Manifolds will be fully compliant with OCIMF recommendations; - Must have helicopter landing / winching area. Risks of collisions are assessed in a bespoke collision risk assessment report by Anatec (2024), which is reported in section 11.1 and oil spill risks are assessed in section 12.1. With regards to the routes that the CTTs are likely to take this is, as yet unknown as the CTTs will be chartered from the international market. However, it is reasonable to expect that the CTTs will enter the Sea Lion field from the North or North East as most they are expected to come from via the Americas or the African continent.
SURF 1	**REDACTED**	**REDACTED**
SURF 2	The International Energy Agency has stated that no new oil and gas fields should be opened if we are to achieve net zero emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit. Opening a new oil field in the Malvinas Islands would not align with this, therefore Surfrider Argentina rejects this decision emphatically. Surfrider Argentina believes the EIS sets out an avoidable and clearly environmentally damaging development proposal. The Environmental Impact Statement is clear that the development would create serious	Please refer to the response to FC 1.

Reference	Representation	Navitas response
	environmental damage and is a project that could be avoided. The millions of tonnes produced during the development and the more than 100 million tonnes from burning of Malvinas oil represents a carbon bomb to the atmosphere. Regrettably, the EIS and proposed development is inconsistent with best practice standards & global climate. The EIS lists CO2 emissions from oil production at approximately 9 million tonnes (p.825 of EIS). Emissions from the burning of Malvinas Sea Lion field oil (a legitimate inclusion in the Statement1) are listed as more than 150 million tonnes if production were to be maximized. The developers have also indicated that further development phases could more than double production of Phases I and II. The Malvinas Islands are well known for its globally significant marine wildlife. Yet, essential information on key animal groups – which we need to understand impacts – are missing, in particular seabirds. The presented seabird data is more than 20 years old. It is well-known that climate change is rapidly changing the distribution of seabirds and their prey at sea.. Projects are expected to provide comprehensive data on bird distributions and movements over a two-year period at considerable cost, before submitting consent applications. This is done ahead of projects being approved, and with all the associated risks of having to change the development. We would consider that this Environmental Impact Statement has cut corners in this potentially expensive aspect of data collection. The International Energy Agency has stated that no new oil and gas fields should be opened if the world is to achieve 'net zero' emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit. This project is a threat to achieve this goal.	
UP 1	1. We write in response to the consultation by the Department for Mineral Resources regarding the Environmental Impact Statement (EIS) for the Sea Lion Field Development. The EIS has been submitted by Navitas Petroleum Development and Production Ltd (Navitas) who intend to develop Phase 1 and 2 of the field with Rockhopper Exploration (Rockhopper).	Thank you for your comments. Responses to the questions and commentary by Uplift are addressed in the responses below.

Reference	Representation	Navitas response
	2. Uplift is a UK-based not-for-profit research organisation that supports a rapid transition from oil and gas production on a timeline consistent with a safe climate. We are interested in and concerned about the proposal to develop a new oil extraction project in the Falkland Islands as a UK overseas territory due to its impact on the climate and incompatibility with UK climate obligations. 3. In reviewing the Sea Lion Development EIS, we consider that it fails to comply with the requirements of the relevant Falkland Islands legislation1; with the UK's and the Falkland Islands' international legal obligations; and with Falkland Islands Government (FIG) guidance2. We consider that the EIA fails to properly assess the environmental impacts of the development, in particular a meaningful assessment of the development's transboundary and cumulative climate impacts. Our comments will set out our concerns about how the EIS falls short in the following areas: a. Combustion emissions. b. Production emissions. c. Mitigation and offsetting of significant environmental impacts. d. Other international legal obligations.	
UP 2	Combustion emissions are not "outwith the control" of the developer 4. The EIS incorrectly concludes that the combustion emissions from the Sea Lion Development are outwith the control of the developer. The atmospheric emissions associated with the combustion of the sold product are identified as "Upper Moderate" in terms of significance, but are described as "outwith Navitas' control" (EIS, Section 16.4, page 1290). 5. The UK Supreme Court recently held in the case of Finch v Surrey County Council3 that the Environmental Impact Assessment (EIA) for an oil extraction project must assess the effect on climate of the combustion of the oil to be produced, and rejected the reasons for disregarding those impacts as flawed (Finch, paragraph 178). 6. The argument that combustion emissions are outwith the control of the developer was expressly rejected by the court. At paragraph 103 of the	Please note: Navitas included the worst-case emissions resulting from the product once sold, however, it remains the case that there is currently no guidance regarding estimation or assessment of such emissions. The narrative will be reworded to state that "Once the oil is produced and sold, it is beyond the abillity of Navitas to determine where, when and how the end-use emissions will be created and thus Navitas has very little ability to influence these aspects." The arguments made in the Finch vs Surrey County Council case are understood by Navitas, including the statement that emissions from the sold product are within Navitas' control in that they could be prevented if Navitas chose not to produce the oil in the first place. However, this EIS is in support of the FDP which is actively seeking approval to develop the oil

Reference	Representation	Navitas response
	decision, the Supreme Court held that: "The combustion emissions are manifestly not outwith the control of the site operators. They are entirely within their control. If no oil is extracted, no combustion emissions will occur. Conversely, any extraction of oil by the site operators will in due course result in GHG emissions upon its inevitable combustion. It is true that the time and place at which the combustion takes place are not within the control of the site operators. But the effect of the combustion emissions on climate does not depend on when or where the combustion takes place. Those factors are irrelevant to the size and significance of the environmental impact". 7. The EIS notes that the environmental legislation that applies to oil and gas in the Falkland Islands is based upon the regulatory requirements for the UK Continental Shelf, and that legal compliance and preparation of required consents would be based on current FIG legislation, where it exists, and with reference to UK legislation and guidance (EIS, Section 1.3.1, page 30). We consider the UK Supreme Court ruling in Finch on the correct interpretation and requirements of the EIA process to be relevant and instructive to the Department for Mineral Resources when considering whether this EIS from Navitas is satisfactory. 8. In our view, consistent with that of the UK Supreme Court, the significant combustion emissions that would inevitably result from Sea Lion Development are manifestly not outwith Navitas' control.	field and produce the oil and gas. To this end, the EIS presents an assessment of the environmental and social impacts and risks of doing so. It is then the decision of FIG, to determine whether or not the impacts and risks, alongside the associated EMMP, are considered to be tolerable when balanced against the economic and social gains. Navitas continue to work closely with FIG as their legislative framework develops.
UP 3	Inadequate identification and assessment of combustion emissions 9. While maintaining that the combustion emissions are outwith their control, Navitas does state that those emissions were estimated for P10, P50 and P90 production cases on the assumption that 100% of the product would be combusted. The figure for those combustion emissions is not provided in the EIS, thereby failing to properly identify and assess the significant effects of the development in the EIS in a clear manner that the general public can understand, as required by the regulations and relevant guidance. 10. Instead, Navitas states that the Sea Lion production per day for a P50	9. The combustion emissions associated with the sold product, assuming 100% combustion, are stated for each of the P10, P50 and P90 cases in 10.9.4.4.8. 10 & 11. The comparison of the total emissions to the daily global demand is not intended as anything other than a means of providing perspective in the context of global demand. Navitas will amend the narrative and present the P10, P50 and P90 case as a percentage of the global demand instead of just the expected P50 case. 12. As emissions are a global impact, the contribution of project in the context of global demand is an appropriate comparison to make. The comparison is not intended to hide the fact that the emissions are

Reference	Representation	Navitas response
	case "represents only 0.03% of global daily emissions" (EIS, Section 1.7.4.2.4, page 53). For the purposes of the EIS, the only relevant scenario is the P10 case, which would reflect the worst-case impacts. By using the P50 case, the EIS has failed to assess the worst-case impacts as required by the legislation and guidance. 11. Assessing the combustion emissions as a percentage of global daily emissions is not a meaningful or informative measure for the purposes of EIA, nor is it in line with legal and regulatory requirements or Falkland Islands guidance. 12. A comparison with a global daily average, or even with the UK daily average emissions, is not sufficient for the purposes of the EIA. Comparing emissions to a global total in a manner which will necessarily result in the emissions from a particular project representing a small proportion of that total are neither instructive nor reflective of their true environmental impact.	considered significant, as is indicated by both the Moderate and Upper Moderate impact assessment outcomes provided.
UP 4	13. We recommend that the assessment of combustion emissions must include an assessment of all quantifiable impacts including the impact on temperature increase, extreme weather events, and whether there is room within the carbon budget for meeting the 1.5°C temperature goal for these further emissions. Rather than comparing one project to a global daily total of emissions, there are a number of more appropriate and telling benchmarks that could be assessed to present the impact in a manner that the general public will understand. a. FIG Guidance on Hydrocarbons Environmental Impact Assessment dated 7 July 2016 (EIA Guidance 2016) states that FIG need to know how the industry will increase emissions in comparison to other local sectors and that "an assessment of atmospheric emissions compared with FI emissions figures is required" (EIA Guidance 2016, paragraph 3.15). This comparison is not provided by Navitas in the EIS. There is insufficient environmental information provided to properly and meaningfully assess the impacts of the combustion emissions. b. The decision of the UK Supreme Court in Finch noted that the direct production emissions in that case were calculated as a proportion of total	Thank you for your comment. It is impossible to determine the impact of a single project on climate change parameters such as temp and weather events. a. An assessment of atmospheric emissions compared with Falkland Islands emissions figures is provided in Section 10.9.4.5.1 and is referenced in the impact assessment in Section 10.9.6.1.1. While the EIA Guidance suggests that FIG needs to know how the industry will increase emissions in comparison to other local sectors, and that FIG can provide data (FIG EIA Guidance 3.15), FIG Environment was not able to provide sufficiently detailed data to enable any meaningful sectoral comparisons to be made. 10.9.4.3.1 notes that the Falkland Islands emissions do not include emissions from international aviation and shipping and that these and other omissions must be taken into account when making direct comparisons. It states further that all comparisons between the Phase 1 & 2 emissions and Falkland Islands emissions must be caveated. Noting these caveats, in 10.9.4.5.1, Navitas has provided an assessment of the Phase 1 & 2 development in comparison to Falkland Islands emissions using the data available.

Reference	Representation	Navitas response
	UK carbon budget, allowing the effects to be described in that context as "negligible" when compared to the national total. However, the court notes that, had it been included, the figure for the combustion emissions would have been nearly two orders of magnitude greater and "could not have been dismissed as 'negligible' in that way" (Finch, paragraph 82). c. The EIS should not just calculate and identify the total combustion emissions, but also assess whether there is room for those emissions in the global carbon budget for meeting the 1.5C temperature goal. Projected CO2 emissions from existing fossil fuel infrastructure, without additional abatement, would exceed the remaining global carbon budget for 1.5°C4. Therefore, any new fossil fuel developments need to be matched by production reductions elsewhere to avoid fossil fuel oversupply and breaching the goals of the Paris Agreement. The EIS makes no attempt to prove these emissions would be substitutive rather than additive. d. The decision of the UK Supreme Court in Finch highlighted the importance of the production gap, i.e. the difference between countries' planned fossil fuel production and global production levels consistent with limiting global warming to 1.5°C or 2°C. The UK Supreme Court notes that the general picture is that many governments continue to support, finance and expand fossil fuel production, even though such policies are "irreconcilable with global climate commitments", referencing the UNEP Production Gap Report 2023 (Finch, paragraph 142). e. The EIS does not make any reference to the production gap and the wider significance and environmental impact of expanding fossil fuel production to which the Sea Lion project would contribute. The fact that such expansion is recognised by expert bodies and the UK Supreme Court as irreconcilable with global climate commitments is not addressed in the EIS. f. The impacts of atmospheric emissions are necessarily cumulative and must not be assessed in isolation. As the International Tribunal for the Law of the Sea (ITLOS) made clear in its recent Advisory Opinion on Climate Change and International law5, in the context of pollution of the	b. Navitas do not conclude that the emissions associated with the development, production or of combustion of the sold product are negligible, and this is indicated throughout the assessment chapter and in all summaries. c - f. This is not the role of a single operator that does not have view of all sources of emissions from projects that are sanctioned, or in the process of being sanctioned. The cumulative impact of emissions is global and long-term and is the driver behind the numerous international instruments in place to manage and reduce global emissions while ensuring sufficient fossil fuel is available to meet demands during the transition to sustainable energy. .

Reference	Representation	Navitas response
	marine environment from anthropogenic GHG emissions, "planned activities may not be environmentally significant if taken in isolation, whereas they may produce significant effects if evaluated in interaction with other activities" (ITLOS Advisory Opinion, paragraph 365).	
UP 5	Production emissions 14. The EIS compares the development's production emissions to the total UK carbon budgets, which is not a legally or scientifically relevant metric by which to assess the significance of their environmental impact. A comparison between the direct emissions from the Sea Lion Development and the projected future UK direct emissions is shown in Table 10.71 of the EIS, showing the Sea Lion production emissions as relatively small percentages of the annual allowance of the UK's 4th, 5th and 6th carbon budgets. This comparison is included to "provide a context within which to assess the 'severity of effect'" (EIS, 10.9.4.5.5, page 833). 15. However, calculating the impact as a percentage of a national or global budget will necessarily always show any individual project making a small contribution to the total, and is not a meaningful comparison on which to base an assessment of environmental impact. Even if the Sea Lion emissions did contribute to the UK's carbon budgets, this assessment is meaningless without indicating how much of that budget has already been used by existing or other planned developments. 16. Nor is the comparison with the UK carbon budgets or a UK total emissions in line with the requirements of the FIG Guidance, which explicitly requires a more local comparison with the Falkland Islands emissions figures (EIA Guidance 2016, 3.15). The annual emissions are demonstrated in the context of Falkland Islands emissions in Table 10.70 based on 2021 emissions data. It is unclear why the EIS uses 2021 data when more recent data is available, and casts doubt on whether the EIS is based on the most up to date environmental information as required by the guidance. In using that baseline of 2021 emissions, the Sea Lion development being responsible for 65% of the Falkland Islands emissions represents a very significant environmental impact. This is the	14 & 15: Navitas recognises that the contribution of any project taken in isolation will amount to a small percentage of aggregated emissions and does not claim that the small percentage contribution leads to a negligible impact. The sensitivity of the atmosphere as a receptor is recognised to be Very High as indicated in Section 8.5.2.1.1 and the overall impacts associated with the emissions are rated as Moderate and Upper Moderate. Mitigations to minimise the impacts are built-in to the basis of design and all emissions will be recorded and monitored. When the worst-case carbon intensity of the project is compared with that provided by the NSTA, as shown in Section 10.9.4.5.4, they are shown to be less than the UKCS average, even when using the lower P90 production rate and including all other emissions which are not factored into the NSTA data e.g. personnel transportation, vessels and drilling emissions. 16. Comparison with the Falkland Island emissions is presented in Section 10.9.4.5.1 and is referred to in Section 10.9.6.1.1. The 65 % contribution is acknowledged as being high but this also needs to take account of the fact that the data set provided by FIG is currently incomplete and does not include emissions from aviation, fishing, shipping or previous offshore O&G activity, all of which are significant contributors. The data used are the most current data supplied by FIG in January 2024. 17 & 18: It is recognised that the UK Carbon Budgets do not yet include emissions from all OT/CD's (see response to DMR 231) but in the absence of any other benchmark, and with the ITCU commitment to progress their inclusion, the UK budgets are used at this time. Should budgets for OT/CDs be established, these will be used in future. Whichever benchmark is used for comparison, Navitas conclude that the emissions are a significant impact, as all emissions now are, and the decision falls to FIG on whether or not these can be considered tolerable in balance with the potential gains. As a single operator, it is not for Navitas to determine how much of a carbon budget has been used already,

Reference	Representation	Navitas response
	most legally relevant comparison for the Department for Mineral Resources to consider. 17. An assessment of Sea Lion's production emissions as a percentage of all emissions from UK Overseas Territories would also be more instructive than a comparison to the UK's carbon budgets - which based on the figures provided would be approximately 10% of production emissions from UK Overseas Territories party to the UK's ratification of the UN Framework Convention on Climate Change (UNFCCC)6. 18. However, if Navitas and the Department for Mineral Resources consider the UK carbon budgets to be a relevant measure, then the mechanisms for meeting those carbon budgets should also be considered. The UK government has committed, within the North Sea Transition Deal (NSTD) to specific targets for the offshore oil and gas industry, which seek to achieve a 50% reduction in greenhouse gas emissions by 2030 against a 2018 baseline within the sector7. The EIS does not demonstrate that Sea Lion would be consistent with the NSTD emissions targets, nor the clear direction of travel in UK oil and gas policy that it reflects.	or will be used by all other future projects, and nor are such data available to them. The UK Government is a statutory consultee to FIG and it is the role of FIG, in consultation, to determine the fate of the proposed project in full consideration of the environment and social impacts.
UP 6	19. As Navitas appear to consider the UK as a relevant comparator, the comparatively high carbon intensity of Sea Lion's production emissions when assessed against UK oil and gas should also be considered. Emissions estimates based on Phase 1 and 2 of the Sea Lion development indicate a carbon intensity of 25.8-35.2 kg CO2 equivalent per barrel of oil produced (EIS, 1.7.4.2.4). Navitas seek to downplay this poor operational emissions performance by comparing the carbon intensity of this new development to existing, producing FPSO-developments operating in the North Sea (EIS, 10.9.4.5.4 and 10.9.4.3.2.3). 20. In fact, the carbon intensity for the Sea Lion development is significantly higher than the average for UK offshore oil and gas (19.8kg CO2/boe in 20228, 26-58% less than Sea Lion). Recent Environmental Statements approved in the UK have had average emissions intensities significantly below the UK average. The proposed Sea Lion development also has an intensity significantly above the global average	The average stated by NSTA and used for comparison in the EIS is based on *actual* intensities of just the production phase for the fields (and excludes personnel transportation, vessel use and drilling), whereas the Sea Lion EIS necessarily has to report potential worst case. Emissions intensity for the Sea Lion 'current expected case' is 18.2 kgCO2e/boe for the whole development at the P50 production case. In order to align with the methodology for emissions reported to the NSTA, it is necessary to consider the production phase only (i.e. excluding the personnel transportation, vessels and drilling emissions); the current expected emissions intensity is below the UK average at 17.3, 14.4 and 12.7 kgCO2e/boe at the expected P90, P50 and P10 production cases, respectively.

Reference	Representation	Navitas response
	(18kg CO2/boe) and median (22kg CO2/boe). 21. The Sea Lion development would therefore perform poorly against UK standards and the NSTD metrics, and would be unlikely to pass the North Sea Transition Authority's effective net zero test for new developments. We note that FIG has no equivalent mechanism to the NSTD or an effective net zero test, suggesting lower standards of regulatory governance compared to the UK. Given that the EIS acknowledges that the regulatory regime is based on that of the UKCS and will look to UK legislation and guidance where the FIG regime is silent (EIS, Section 1.3.1, page 30), we recommend that the Department for Mineral Resources implement their own effective net zero test as part of the approval process for new developments, including Sea Lion.	
UP 7a	Mitigation and offsetting 22. The Offshore Minerals Ordinance 1994 requires the EIS to describe the measures that are envisaged to eliminate or reduce significant adverse effects, remedy those effects if possible, and offset them. FIG Guidance requires that mitigation and off-setting measures "should not be hypothetical or unrealistic, but measures which the applicant is proposing to use and is confident will be practicable and effective within the local context" (EIA Guidance 2016, paragraph 3.22). The EIS should demonstrate that the mitigation is realistic (EIA Guidance 2016, paragraph 3.22). There are a number of impacts and risks of concern that cannot be mitigated at all, or for which the EIS proposes mitigations which are not realistic. It is concerning that a number of environmental impacts and risks remain significant, with no mitigation or offsetting identified.	These comments are noted. 1. Navitas is committed to offsetting impacts that are significant. 2. This includes the offsetting of impacts that are uncertain or intermittent. 3. The EIS does not propose offsetting for unplanned impacts (e.g. full inventory loss of oil from the FPSO). 4. Table 8.9 refers to DIrect offsetting opportunities of impacts that are assessed to be significant (moderate or above). 5.Where direct offsets are not available, Navitas will deploy indirect offsetting. This will be clarified in Table 8.9 in the post consultation EIS. 6.EIS Section 8.11.4 explains that offsetting projects that benefit the Falkland Islands environment will be prioritised over international schemes; this is in line with FIG guidance. 7. FIG has developed further offsetting guidance since their EIA Guidance 2016 was published. This includes the option of contribution to an environmental fund to directly commission, manage and oversee offsetting projects. 8. Navitas is funding additional research in order to be confident that the offsetting measures currently under consideration will be practicable and effective within the local context. 9. Navitas' Offsetting approach will align with FIG's Policy and Legislation.

Reference	Representation	Navitas response
UP 7b	23. The EIS acknowledges that a number of environmental risks "remain significant" even after consideration of both base-case and project-specific mitigations. These include the risk of bird strikes due to artificial light and risk of collision between marine mammals and vessels, which remain "Moderate", and others including the impacts from atmospheric emissions associated with combustion of the oil remaining "Upper Moderate" (EIS, Table 1.6, page 51).	Navitas note these comments.
UP 7c	24. There are a number of significant impacts for which no realistic mitigation or offsetting can be identified. Table 8.9 shows that no realistic direct offsetting of the bird strike or injury to marine mammals from collision could be identified. In relation to the impacts of atmospheric emissions, Table 8.9 notes that there are no emissions trading schemes in the Falkland Islands and that other carbon offsetting initiatives have been identified but require further research and analysis "to determine their efficacy and the quantum of potential offset prior to such initiatives being taken forward". As for indirect offsetting, Navitas accepts that they have not been able to identify indirect offsetting projects to the level of maturity required. It is not satisfactory that some of the most significant environmental impacts remain without mitigation or offsetting, notwithstanding the questionable efficacy of offsetting as a strategy to mitigate emissions.	Navitas will update Table 8.9 in the post consutlation EIS to ensure it is clear that where there is no direct offset identified, indirect offsetting will be undertaken. Please refer to EIS Section 8.11.2.1 on indirect offsetting. Feasibility of various identified potential direct and indirect offsetting intiatives cannot be confirmed without further research, analysis and development. Navitas is committed to funding the required feasibility studies, empirical data gathering and pilot programmes to inform the feasibility of large scale carbon and biodiversity offsetting. Navitas' Offsetting approach will align with FIG's Policy and Legislation. Please see response to comment UP 7e.
UP 7d	25. Where project-specific mitigations are identified to reduce some risks, those mitigations are not realistic and the downgrading of risks in this way without clear mitigation or off-setting plans undermines the precautionary approach.	It is not clear what examples are being referred to here. Navitas believes that the EIS presents a thorough and robust assessment, that project-specific mitigations are realistic, and the precautionary approach has been applied appropriately.
UP 7e	26. While the combustion emissions that would occur when Sea Lion's oil is burned are included in the EIS, to the limited extent that they are described only as a percentage of the global daily average, there is no attempt to mitigate, eliminate, reduce, or offset their significant environmental impacts.	Navitas' offsetting strategy has been detailed in a paper which was issued to FIG in August 2024. Navitas is committed to comply with FIG legislation, policy and guidance. Following regulatory approval, Navitas will implement a dedicated carbon and biodiversity offsetting fund that will be financed by contributions from Navitas and governed by a steering group comprising Navitas, FIG

Reference	Representation	Navitas response
		and NGO stakeholders and technical advisors. The performance of Navitas' offsetting programme will be reported. Please note that once the oil is produced and sold, the title transfers and then it is beyond the ability of Navitas to determine where, when and how the end-use emissions will be created, and thus Navitas has very little ability to influence these aspects. Please also refer to UP 2.
UP 8	Other international legal obligations 27. The UK must report its emissions, plus those Crown Dependence and Overseas Territories which have had the UK ratification of the UNFCCC extended to them, under the UNFCCC process. The UK has extended its ratification of the UNFCCC to the Falkland Islands9. While the Paris Agreement has not been extended to the Falkland Islands, it is clear that Navitas consider it to be relevant legislation, and the UK may consider extending the Paris Agreement to other Overseas Territories. The UK is already not on track to meet its Nationally Determined Contribution and will need to put forward additional plans for reduction emissions if this was to be extended to the Falkland Islands and the Sea Lion project is approved.	Navitas expects that FIG will comment separately on the EIS public consultation representations which concern FIG's Policy and Legal Obligations.
UP 9	28. The UK's status as a party to the UN Convention on the Law of the Sea (UNCLOS)10 extends to the Falkland Islands. UNCLOS includes obligations to adopt laws and regulations to prevent, reduce, and control pollution of the marine environment from land-based sources and from the atmosphere. Measures must include "those designed to minimize to the fullest possible extent" the "release of toxic, harmful or noxious substances from land-based sources" and pollution from vessels or installations at sea (UNCLOS, Article 194). 29. Article 194 of UNCLOS requires states to take "all necessary measures" to prevent, reduce and control pollution of the marine environment from "any source". The recent unanimous Advisory Opinion of ITLOS confirms that anthropogenic GHG emissions constitute pollution of the marine environment and that the obligation to take all necessary measures applies to such pollution (ITLOS Advisory	Navitas notes this comment. Navitas expects FIG to address responders' comments on legislative matters separately.

Reference	Representation	Navitas response
	Opinion, paragraph 197). 30. The ITLOS Advisory Opinion makes clear that the obligations under UNCLOS are not satisfied by simply complying with the obligations and commitments of the Paris Agreement (ITLOS Advisory Opinion, paragraph 223). Rather, it seems that "all necessary measures" requires, at the very least and only as a minimum, compliance with those emissions reductions obligations. 31. We recommend that the Department of Mineral Resources should aim to go beyond the bare minimum compliance with its obligations under the legislation and its regulatory regime if it hopes to comply with its obligations under UNCLOS. It is clear following the ITLOS advisory opinion that states and signatories must take very significant action to prevent pollution from any source, including greenhouse gas emissions, to comply with their UNCLOS obligations.	
UP 10	Conclusion 32. We consider the EIS for the Sea Lion Development to be inadequate and the project unfit for approval in light of its excessive emissions, which have not been adequately assessed or disclosed, as well as transboundary and cumulative impacts, including on the marine environment and the climate, which have not been properly assessed. 33. There is strong scientific evidence and consensus that new oil and gas production is not compatible with net zero emissions by 2050, which is the relevant target within the comparable UK regime, or with a 1.5°C or 2°C pathway. 34. On this basis, and the numerous inadequacies of the EIS, consent for the Sea Lion Development should not be granted.	Navitas notes this comment but disagrees with its conclusions. As detailed in the EIS, Navitas acknowledges the energy transition. Navitas has presented a field development plan which shall have a lower carbon per barrel intensity than the average North Sea production. Please refer to response to RSPB 7.

Key:
BYR = Byron Holdings Limited
CoC = Chamber of Commerce
DGN = Dragon Fishing and Trading
ED = Environment Department (FIG)
FC = Falklands Conservation

FIC = Falkland Islands Company
FIFD = Fisheries Department (FIG)
FIMA = Falkland Islands Maritime Authority (FIG)
FOR = Fortuna Ltd. Group
FPN = Fundacion Patagonia Natural
H&S = Health and Safety (FIG)
IND1 = Individual representation
IND2 = Individual representation
IND3 = Individual representation
IND4 = Individual representation
IND5 = Individual representation
IND6 = Individual representation
IND7 = Individual representation
IND8 = Individual representation
IND9 = Individual representation
IND10 = Individual representation
IND11 = Individual representation
IND12 = Individual representation
IND13 = Individual representation
IND14 = Individual representation
RSPB = Royal Society for the Protection of Birds
SEAFISH = Seafish (Falklands) Limited
SURF = Surfrider Argentina
UP = Uplift

Part II: Requests for information made under section 66 of the OMO

Reference	Request for information	Navitas response
DMR 1	Page 4: "Environment Unit" should be "Environment Department", "Department of Natural Resources" should be "Directorate of Natural Resources" (the latter comment applies to several other references to the Department of Natural Resources in the document).	Thank you for your comment. This is noted and these will be updated.
DMR 2	Page 8: Formatting of appendix 1 is messed up (the page number is not right-aligned).	Thank you for your comment. Formatting will be checked.
DMR 3	Page 9-16: Listing of figure 7-6 includes a note; listings of several other figures include sources, urls or other extended text that are not needed for the contents section and make it hard to read.	Thank you for your comment. This is noted and the text will be amended.
DMR 4	Pages 17-24: Similarly listings of several tables include sources or other extended text not needed for the contents section	Thank you for your comment. This is noted and the text will be amended.
DMR 5	Page 27: It would be helpful to state that the Health, Safety and Security policy and Environment and Biodiversity policy are given in full in section 3.2.1 (also, the name of the policy is “Environment” not “Environmental”)	Thank you for your comment. This is noted and the text will be amended.
DMR 6	Page 28: There are no statutory consultees for an EIS in the Falkland Islands. This comment also applies to several other mentions of statutory consultees (pages 80, 216, 223)	Thank you for your comment. This is noted and the text will be amended to 'expected consultees'.
DMR 7	Page 29: Figure 1-1 is extremely low quality and the text barely legible. The same applies to figure 1-2 on page 74.	Thank you for your comment. Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout in the post-consultation version. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 8	Page 30: The sentence "Environmental legislation that applies to Oil and Gas (O&G) activities within the Falkland Islands is based upon the regulatory requirements for the United Kingdom Continental Shelf (UKCS)." could perhaps be better reworded as "Falkland Islands environmental legislation that applies to Oil and Gas (O&G) activities is largely based upon the regulatory requirements for the United Kingdom Continental Shelf (UKCS)." as the original wording could be read as UK	Thank you for your comment. This is noted and the text will be amended.

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	law being applied in the Falklands, whereas the Falkland Islands has its own legislation.	
DMR 9	Page 30: The Offshore Petroleum (Licensing) Regulations 2000 is a standalone piece of legislation, not an amendment to the 1995 regulations, and should be listed separately	Thank you for your comment. This is noted and the text will be amended.
DMR 10	Page 31: In the final paragraph, it would be helpful to state how many wells will need to be drilled to start production, and how many will be drilled during the SIMOPS period.	Thank you for your comment. This is noted and a summary will be added.
DMR 11	Page 34: References "remote GI well(s)" but earlier states there will be only one.	The reason for the '(s)' is to indicate that while there will only be one completed and functioning GI well, two may actually be drilled should the first one be insufficient. However, the sentence in question is referring to the operational GI well of which there will be only one and the sentence will be updated to reflect this.
DMR 12	Page 34: References a single tanker – perhaps should be plural to make it clear there will not only be one tanker offloading from the FPSO?	Thank you for your comment. This is noted and wording will be checked for clarity.
DMR 13	Page 36: There are no local authorities in the Falklands – it is presumed this refers to FIG?	Thank you for your comment. This is noted and the text will be amended.
DMR 14	Page 42: Table 1.4 references two types of fisheries but gives three catches by weight (49.5%, 25.1% and 5.2%). The missing one appears to be Patagonian rock cod (which is 5.2% of the 2013-2022 catch).	Thank you for your comment. This is noted and the text will be amended.
DMR 15	Page 45: In the Project Activities section of figure 1-3: • Why is there onshore helicopter disturbance from oil export but not other project phases? • Will there not be underwater noise from subsea works or oil export (e.g. from the tankers)? The text on page 672 on noise scenarios includes the installation of subsea infrastructure, while on page 656 CTTs are included as sources of underwater noise. • Oil export will have atmospheric emissions from tankers. In the Environmental aspects section: • Would atmospheric emissions not affect regional air quality (particulates etc)? • Would increased vessel presence not affect seabirds? • Would seabed disturbance not affect archaeology?	Thank you for your comment. This is noted and Figure 1-3 will be reviewed and updated as necessary.

Reference	Request for information	Navitas response
	• Other users of the sea could be affected by competition for onshore resource if they also use onshore facilities	
DMR 16	Page 47: The "(see section 1.7.3)" is self-referencing	Thank you for your comment. This is noted and the text will be amended.
DMR 17	Page 47: Table 2.8 is referenced but does not exist	Thank you for your comment. This is noted and the text will be amended.
DMR 18	Page 51: In table 1.6 the section numbers are wrong for "Behavioural disturbance to marine mammals from underwater noise offshore" (should be 10.4) and "Impacts of drill cuttings discharge" (should be 10.6).	Thank you for your comment. This is noted and the text will be amended.
DMR 19	Page 52: It would be helpful to note here and in other locations (such as 4.5.1 and 5.4) that details of what Non-Aqueous Drill Fluid is composed of are given in section 10.6.4.1.3.1	Thank you for your comment. This is noted and reference to the relevant section will be added.
DMR 20	Page 53: Regarding the carbon intensity figures given, it should be mentioned that these are a worst case, not the expected case. It would also be preferable to reference Falkland Islands emissions rather than UK emissions, as this is not a UK development.	The NTS summary will be updated to clarify this and to include reference to the Falkland Island emissions, although as in the body of the EIS this will be caveated with the fact that the Falkland's Islands data set is incomplete and currently omits some big contributors (e.g. air traffic, fishing, aviation).
DMR 21	Page 57: While Falkland Islands law requires well designs to be peer reviewed by an independent well examiner, it is not a legal requirement for them to be reviewed by the UK HSE, although this may be considered good practice.	Thank you for your comment. This is noted and the text will be amended to clarify. Previous DMR guidance and practice has been that PON4 applications to drill, including well designs and geological well evaluations, have been reviewed by DMR with support from UK HSEx and BGS.
DMR 22	Page 58: AIS is mentioned but the initialism is not explained until the following page.	Thank you for your comment. This is noted and the text will be amended.
DMR 23	Page 61: Table 1.7 does not appear to be consistent with the environmental impacts identified in figure 1-3 – for example, artificial light was identified as having an impact on marine mammals and human populations in figure 1-3, but these are not rated in table 1.7. Similarly, seabed disturbance was identified as affecting water quality in 1-3 but not rated in 1.7. There are many other such inconsistencies between the table and figure.	Thank you for your comment. These will be checked and cross-referenced and updated where necessary.
DMR 24	Page 66: An EMMP group is referenced but not defined. Who would this include? Assume FIG, Navitas and possibly relevant stakeholders?	Thank you for your comment. Please refer to the EMMP Workshop Report (April 2019). Please also refer to EIS Section 15.5 on EIS Governance. Navitas will

Reference	Request for information	Navitas response
		expand the information on the EMMP governance and advisory group provided in Ch15 in the post consultation EIS to ensure it is clear.
DMR 25	Page 68: “Implementation of the Biosecurity Management Plan (BMP)” should also be listed in the “Introduction of non-native marine species” row, as (according to p108) it appears to be intended to cover both.	Thank you for your comment. This is noted and the text will be amended.
DMR 26	Page 74: Figure 2-1 is extremely low quality.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 27	Page 75: It would be helpful to state how many wells are expected in each stage.	Thank you for your comment. This is noted and will be added.
DMR 28	Page 76: The second paragraph mentions an exclusion zone and references figure 2-2, but the figure does not show an exclusion zone.	Thank you for your comment. This is noted and the reference to the figure will be removed.
DMR 29	Page 76: It would be helpful to explain what “treated seawater” is.	Thank you for your comment. This is noted and the text will be amended.
DMR 30	Page 77: MRSV is mentioned for the first time but not explained.	Thank you for your comment. This is noted and the text will be amended.
DMR 31	Page 79: The scope of the EIA now also includes emissions from use of the oil.	Thank you for your comment. This is noted and the text will be amended.
DMR 32	Page 80: The text references a decommissioning-specific EIA being “in accordance with the approach taken in the UK with regard to developments on the UK continental Shelf (UKCS) and the DECC (now BEIS) Decommissioning Guidelines (BEIS, 2018)).” However, the Falkland Islands will have its own requirements. The reference to BEIS (in red) should now be DEZNZ.	Thank you for your comment. This is noted and the text will be amended.
DMR 33	Page 81: Table 2.1 is missing the offsetting section.	Thank you for your comment. This is noted and the text will be amended.
DMR 34	Page 91: The Offshore Petroleum (Licensing) Regulations 2000 is a standalone piece of legislation, not an amendment to the 1995 regulations, and should be listed separately.	Thank you for your comment. This is noted and the text will be amended.
DMR 35	Page 92: FIG is not planning to repeal the 1994 OMO. There will be a new Safety and Environment Ordinance and the 1994 OMO will be amended. to remove the safety and environmental areas covered by the new bill and updated to cover other areas as required.	Thank you for your comment. This is noted and the text will be amended.

Reference	Request for information	Navitas response
DMR 36	Page 93: The new legislation will not "align with UK best practice" – the aim is to bring in standards at least as high as the UK and may go further than the UK in some areas.	Thank you for your comment. This is noted and the text will be amended.
DMR 37	Page 93: As per the record of Law and Regulations- the 1995 Regulations were never amended. However, the 2000 Regulations were amended. subsequently in 2004, 2005 and 2009.	Thank you for your comment. This is noted and the text will be amended.
DMR 38	Page 93: The relevant enactment is Falkland Islands (Continental Shelf) Proclamation 1991. There is no ordinance to this effect.	Thank you for your comment. This is noted and the text will be amended.
DMR 39	Page 95: The Falkland Islands Environmental Trust Ordinance 2021 has yet to be commenced.	Thank you for your comment. This is noted and the text will be amended.
DMR 40	Page 96: One PON has been missed off the list: PON11 - Loss or dumping of materials at sea from offshore oil and gas installations.	Thank you for your comment. This is noted and the text will be amended.
DMR 41	Page 100: In item 3 of table 3.2, "the provision of appropriate resources to meet objectives are available delivering a sustainable and predictable business outcome" does not seem to make sense. Similarly, "Change into our organisation is managed" in item 8 may be an error.	Thank you for your comment. This is noted and the wording will be amended to clarify.
DMR 42	Page 107: It would be useful to say who the key stakeholders that have been identified are (or confirm that they are the ones listed in table 6-2)	Thank you for your comment. This is noted and the text will be amended.
DMR 43	Page 107: The timing of the OPEPs is a bit unclear. It is expected they are available around the same time as the EIS is published for consultation (the EIS guidance recommends they are published at the same time as the EIS), but the text refers to them being "developed during the Execute stage"	Thank you for your comment. The preliminary OPEPs were submitted to FIG in August 2024. Prior to the commencement of operations, the OPEPs will be updated and supplemented in order to produce operational OPEPs. They will have an approved lifespan of five years from the date of first approval by FIG and shall be submitted in their entirety for re-approval 2 months before that time.
DMR 44	Page 111: It says that "Between 2012 and 2020, the relevant licences were owned by Premier" but then "POEPL was bought by Navitas Petroleum in September 2022" – what was the status between 2020 and 2022?	Thank you for your comment. The text will be clarified to explain that in 2020 the parent company of Premier Oil Exploration and Production Ltd (POEPL), Premier Oil and Chrysaor merged to form Harbour Energy Plc. Harbour Energy Plc then sold POEPL to Navitas Petroleum in September 2022.
DMR 45	Page 113: The text states three options were shortlisted and then lists four options.	Thank you for your comment. This is noted and the text will be amended.
DMR 46	Page 116: Why are emissions from fuel gas usage reported in megawatt thermal?	Thank you for your comment. This Chapter is on the consideration of alternatives and Table 4.3 shows only the screening differentiators between an FPSO and a TLP, both of which were considered by POEPL in

Reference	Request for information	Navitas response
		the early stages of the project development. The MWth figures simply indicate the likely thermal power of the two installations which has a bearing on the emissions. The table is not intended to indicate the actual emissions. Navitas recognise that the parameter ('Air Quality (emissions from fuel gas usage)') could be misleading and this will be changed to 'Thermal Power' and footnoted to explain that this is an indicator for potential fuel gas usage.
DMR 47	Page 117: It is stated twice that table 4.4 covers seven key differences, but the table only contains six.	Thank you for your comment. This is noted and the text will be amended.
DMR 48	Page 118: The table heading says seven key areas, but there are six.	Thank you for your comment. This is noted and the text will be amended.
DMR 49	Page 119: The table references a 500m exclusion zone, but the exclusion zone will be 1,275m during operations (the 500m zone is for the MODU).	Thank you for your comment. This is noted and the text will be amended.
DMR 50	Page 120: Table 4.5 twice mentions removing three vessels from the field, but it is not clear which vessels would be removed if a CTT is used rather than an FPSO.	Thank you for your comment. The comparison is made between 'Direct Offtake within the Sea Lion Field' and 'Ship to Ship transfers in Berkeley Sound' (which had been planned in a previous EIS but has since been discounted.) With ship to ship transfers in Berkeley Sound an Offshore Loading Shuttle Tanker (OLST) would have been required to carry the product from the FPSO to the awaiting CTT in Berkeley Sound, a launch would then have been required to take the pilots out to the OLST in Berkeley Sound and a tug to hold back the OLST. With the selected 'direct offtake' method, the OLST, the Berkeley Sound pilot boat and hold back tug are no longer required hence the reduction in 3 vessels.
DMR 51	Page 120: The previous EIS was not approved, it was accepted (FIG does not approve EISs).	Thank you for your comment. This is noted and the text will be amended.
DMR 52	Page 121: The last sentence references document SBS-PLN-00001-05 but the latest version is SBS-PLN-00001-06.	Thank you for your comment. This is noted and the text will be amended.
DMR 53	Page 123: It is stated in the section on mitigation measures not considered appropriate that an HP flare ignition was investigated but is not currently sufficiently proven. However, this contradicts information elsewhere stating that an automated ignition system will be investigated (table 1.9, section 10.1.10.1, 10.9.7, table 10.73, and is a commitment in the EMMP (15.7.2.1).	Thank you for your comment. This is noted and the text will be amended.

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DMR 54	Page 123: It states that the use of slick paints is being investigated, but section 4.5 is for mitigation measures that are not proposed for use and not considered appropriate. This should either be removed or the section description changed.	Thank you for your comment. This is noted and the text will be amended.
DMR 55	Page 124: It is stated that “skimmers were not a viable response” to Sea Lion Crude. However, use of skimmers is still mentioned in the oil spill response sections 12.1.1.1.3, 12.1.4.4.6 and 12.1.4.6.2.	Thank you for your comment. This is noted and Navitas acknowledge that the EIS is not clear on the differentiation between the skimmer types and that the statement in Section 4.5.9 is misleading. The EIS will be updated for clarity and consistency. For Sea Lion crude, the CEDRE 2017 report states that 'oleophilic skimmers should not be recommended, as well as weir skimmers'. However, belt skimmers would be appropriate. This equipment is specified in the Preliminary OPEPs submitted to FIG. Note that weir skimming devices have been chosen to respond to MGO spills. The text will be clarified in the relevant sections of the EIS.
DMR 56	Page 133: Inshore infrastructure is referenced in table 5.1, but there is no planned inshore infrastructure.	Thank you for your comment. This is noted and the text will be removed.
DMR 57	Page 135: Figure 5-2 is very low quality, making it quite hard to read (the colours of the pipelines is hard to follow).	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 58	Page 141: What does “Once the produced water ‘breaks-through’” mean?	Thank you for your comment. This refers to the point at which the reservoir starts producing water as well as oil. The narrative will be updated to make this clearer.
DMR 59	Pages 141-142: It is stated that there will be eight wells and then lists a possible nine. It may be best to reword to make it clearer that there may be more than eight.	Thank you for your comment. The potential 9th well states that this a contingency. However the text can be amended to reiterate there will ultimately be only one gas well and therefore eight functioning wells.
DMR 60	Page 142: It would be helpful to note that details on what sweeps are composed of are given in section 10.6.4.1.3.1.	Thank you for your comment. This is noted and the text will be amended.
DMR 61	Page 146: The first bullet point might be simpler to understand to the average reader if “a ‘kick’ of formation fluid” (neither term in red is defined in the document) was replaced with just “oil/gas”.	Thank you for your comment. This is noted and the text will be amended.

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DMR 62	Page 146: In the sentence “ensure that the concentration of NADF is less than 1 % by dry weight”, “NADF” should be “oil”.	Thank you for your comment. The narrative will be amended to state: “ensure that the oil concentration of NADF on cuttings is less than 1 % by dry weight”.
DMR 63	Page 147: “If any cuttings are sampled that are not <1% by weight on cuttings” doesn’t seem to make sense.	The narrative will be amended to state: “If any cuttings are sampled and the concentration of entrained oil is not <1% by weight on cuttings”.
DMR 64	Page 147: “mud pits” are referenced but not explained. Where are they located?	Thank you for your comment. This is noted and a footnote will be added to the text.
DMR 65	Page 150: The Sea Lion Completion Basis of Design (SLN-CMP-WEL-BOD-00001-00) document was not provided as part of the FDP document set. When is it expected?	This BoD is an internal document and does not form part of the FDP submission. The completion design will be detailed in each PON 4 submission to FIG for approval prior to drilling commencing.
DMR 66	Page 150: CaCo3 should be CaCO3 (assuming it refers to calcium carbonate, not calcium cobaltite).	Thank you for your comment. This is noted and the text will be amended.
DMR 67	Page 152: It states that “All explosives will be stored as described in Section 5.11.1.2” but section 5.11.1.2 does not describe how they will be stored (it only states “Explosives which require a bespoke and secure storage facility”).	Explosives may be required in the event of stuck-pipe, to release a pipe should it get stuck down-hole. Detail will be added to Section 5.11.1.2 to describe storage.
DMR 68	Page 155: It is not clear why gas needs to be flared during commissioning of the systems (generating 1,000 tonnes of CO2 per day), as the FPSO has capacity to start building up an inventory of gas. Can it be explained why gas needs to be flared and cannot be stored?	Associated gas is liberated from the oil producing wells. There needs to be sufficient volume of gas liberated to meet with the minimum operating parameters of the gas compression system to allow for safe start up of the gas compression process. During commissioning, the initial start up of the gas compression system takes longer than normal start up as control system and instrumentation systems need to be calibrated and tuned before handing over to normal operations. Navitas will review methodology to determine the 389.2 figure (Refer to Development Description section 5.4.9) and clarify as necessary in the post consultation EIS. Navitas has taken a conservative approach to the volume of gas we would flare at start up as we will be making modifications to the existing systems; when adding new units to existing systems, these often present more difficult challenges compared to all new systems when starting up.

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		However, a robust approach to pre-commissioning prior to sail away and keeping core competent resource from the existing crew will ensure the commissioning exercise has the best opportunity in reducing flared volumes below the current conservative volumes.
DMR 69	Page 155: The third bullet point seems unnecessary given the content of the second one (perhaps they could be merged)?	Thank you for your comment. This is noted and the text will be amended.
DMR 70	Page 155: It states that "Detail on the installation and operation of the X-mas tree is provided in Section 5.8.1", but section 5.8.1 on gives a very brief explanation of what an X-mas tree is, not how it is installed or operated.	Thank you for your comment. This is noted and the text will be amended.
DMR 71	Page 156: It is not explained how and why the indicative locations of the moorings were chosen. This would be useful.	Thank you for your comment. These indicative locations were previously identified in consultation with the FIG Harbour Master as they appeared to offer sufficient sea-room for the mooring and offload of the LTVs, without hindering other Berkeley Sound users, and were not considered to be of particular environmental sensitivity. Final locations will be determined in consultation with FIG with decision criteria covering both environmental and socio-economic (other users of Berkeley Sound) considerations. This will be clarified in the post consultation EIS.
DMR 72	Page : It is not clear why the sentence "Detail on the installation process, quantities and / or dimensions of each bit of infrastructure are provided Table 5.12 below." is included as this section is not about infrastructure.	Thank you for your comment. This is noted and the text will be amended.
DMR 73	Page 158: The second paragraph in this section says that "Additional clump weights and tethers may also be required". The third paragraph then starts "However, in addition to the above, temporary deposits such as clump weights and tethers may also be required."	Thank you for your comment. This is noted and the text will be amended.
DMR 74	Page 158: The final paragraph references table 5.13, but it should be 5.12.	Thank you for your comment. This is noted and the text will be amended.
DMR 75	Page 159: The first paragraph incorrectly references table 1.13 (it should be 5.13), but mention is not needed as the table is referenced earlier in the same sentence.	Thank you for your comment. This is noted and the text will be amended.
DMR 76	Page 164: Figure 5-6 is very low quality and the text illegible in places	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.

Reference	Request for information	Navitas response
DMR 77	Page 165: Figure 5-7 is very low quality and the text illegible in places	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 78	Page 168: The paragraph references "Table x" – presumably supposed to be figure 5-8?	Thank you for your comment. This is noted and the text will be amended.
DMR 79	Page 169: What is the "2C" referenced in figure 5-8?	2C refers to the contingent resources versus proven resources and shows the mid-case, best technical estimate. It is similar to the P50 estimate but is not quite synonymous. For the sake of clarity, the EIS will be updated to show the P10-P50-P90 production profiles (the P50 estimate being almost identical to the 2C case).
DMR 80	Page 169: Is the consumption of 5mmscfd of fuel gas per day per GTG or for all three? (this is specified for diesel)	The estimated fuel gas usage includes all GTGs and is for all three turbines. Of note, mmscfd = million standard cubic feet per day. Navitas will ensure this is clear in the post-consultation EIS.
DMR 81	Page 170: R134a does not have a low GWP and as a result a 2006 EU Directive recommended its phase out, which started in 2010. The United States has also started phasing it out. R-1234yf or similar products are ones with a genuinely low GWP.	Thank you for your comment. This is noted and agreed. The example of R134a will be removed. Although the commitment to use low GWP F-gases remains.
DMR 82	Page 171: Reference is made to table 17 – it is assumed this is meant to be 5.16? It also references "Table 10.9" but this potentially should be "Section 10.9".	Thank you for your comment. This is noted and the text will be amended.
DMR 83	Page 172: The final paragraph references section 3.2, but it is not clear why (as section 3.2 is not about detailed design).	Thank you for your comment. This is noted and the text will be amended.
DMR 84	Page 174: There is another reference to section 3.2, but it is not clear why (as section 3.2 is not about detailed design).	Thank you for your comment. This is noted. The reference to Section 3.2 is that the OMS describes the project development process. However the reference will be removed.
DMR 85	Page 180: Figure 5-9 is very low quality and the text illegible in places	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 86	Page 182: If there was a significant reduction in injectivity, would consideration be given to drilling more WI wells?	Thank you for your comment. Yes, this would be considered but only after the root cause of decline has been identified and alternative remediation methods have been attempted.

Reference	Request for information	Navitas response
DMR 87	Page 183: It is stated that it will not be necessary to heat the injected water after the first year. Is the temperature spec in table 5.20 only for the first year? If so, perhaps that could be made clear in the table.	Thank you for your comment. This is noted and Table 5.20 will be edited to make it clear that heated WI is only for the first year. Heated water injection will be required for the initial period of production lasting 12 months. Further details and assumptions are also provided in Section 10.9.4.4.1 and Table 10.63.
DMR 88	Page 184: Under what circumstances would produced water be deemed unsuitable for reinjection?	Thank you for your comment. Produced water compatibility tests have been performed to demonstrate that it can be reinjected into reservoir and process equipment has been designed to ensure the water meets the standards to be reinjected. The provision for overboarding of treated produced water would be a short term contingency provision for unforeseeable circumstances. A note will be added to the post consultation EIS to ensure this is clear.
DMR 89	Page 190: The FPSO/MODU will also presumably not use the TDF? Will all other vessels listed in table 5.24 except CTTs and LTVs use the TDF? The start date given for upgrading the causeway (Q2 2024) appears to be out of date. The second paragraph references "H1 2024" – is this meant to be Q1, and if so, is it still correct?	Thank you for your comment. Neither the FPSO nor the MODU will use the TDF, indeed neither will visit any location in the Falkland Islands and will remain at the Sea Lion field only. The CTTs will not use the TDF either. They will call into the Sea Lion field accept their cargo from the FPSO then continue on their international voyage. The LTVs will only use Berkeley Sound (and will not call into the TDF). It is also highly unlikely that the OCVs will use the TDF (due to draft). The vessels which will use the TDF are the OSVs and ad hoc freighters (i.e. the supporting vessels, all with a draft less than 7m). These vessels will all use the TDF in line with the project description. With regards to the timing of the TDF Causeway upgrade the correction is noted. It is expected, subject to project sanction and planning approval, that the causeway upgrade will commence in 1H 2025 (first half to 2025). The contractor has been selected and budget allocated.
DMR 90	Page 192: The top two rows (supply base and mud plant) state the duration of requirement as five years. However, the two drilling campaigns start in year 2 and end in year 9 – is five years correct?	Thank you for your comment. The text will be clarified. The mud plant will only be in active use for ~5 years during the Phase 1 and Phase 2 development drilling campaigns. However, due to the scheduling of the programme, it will be in place a short time prior to the commencement of Phase 1 during the break between Phase 1 and Phase 2 and throughout Phase 2. If no further drilling activity is planned after

Reference	Request for information	Navitas response
		Phase 2 it shall be dismantled. So, in answer to the question, the mud plant (LMP) will be in situ for up to 9 years but only active for ~5. With regards to the supply base, this is similar. The supply base will increase and decrease in size and activity levels throughout the stages of the development programme. It will be at its busiest and largest during SIMOPs and smallest and least active during steady state operations. The supply base will remain throughout the lifecycle of the Sea Lion Field.
DMR 91	Page 193: The new incinerator is expected to be ready for operation in Q1 2026 – is this "well in advance of the Seal Lion development campaign"?	Thank you for your comment. At the time of writing the EIS, the incinerator was expected in 2024. Latest estimate from PWD (provided August 2024) is end 2025. There are mitigations/contingency plans detailed in the EIS in the event that the incinerator is not ready prior to the commencement of Sea Lion operations.
DMR 92	Page 195: Final sentences references EIA rather than EIS.	Thank you for your comment. This is noted and the text will be amended.
DMR 93	Page 199: EIA is used instead of EIS.	Thank you for your comment. This is noted and the text will be amended.
DMR 94	Page 200: It is estimated that there will be 17 SAR training flights per month. However, in table 5.25 it states there will be 20 hours per month and 3 hours in each flight, which would be 6.7 flights per month. The 6.7 figure (incorrectly rounded to 6.6 here and elsewhere) is used later in the EIS in table 10.9. Would there really be more than this many training flights for the whole length of the project?	Thank you for your comment. Table 5.25 is correct. The UK CAA (in CAP 999) states in section 3.9 and 3.10, that the helicopter operator is responsible for the number of SAR training hours. Navitas' selected helicopter operator states that 20 hours per month is the expected number of SAR training hours required per month. The text will be amended to correct this in the post-consultation EIS.
DMR 95	Page 202: How will Navitas "encourage the private sector to increase rental housing stock to meet demand"?	Thank you for your comment. Navitas will tender for the construction of rental housing units. An expression of interest exercise has already determined that there is interest and capability in the Falklands private sector in responding to this demand and engaging in the competitive tender process. Navitas will ensure that this is clear in the post consultation EIS.
DMR 96	Page 202: The Accommodation type section only covers the hostels. Could details be given of the temporary accommodation unity and in-transit accommodation unit?	Thank you for your comment. 'Hostel-type accommodation' perhaps misrepresents the intent of this section. Elsewhere in Public Consultation Presentations and those to the Chamber of Commerce as well as the Expression of Interest (EOI) in the Penguin News, this requirement was called a 'hotel'. Apologies for this confusion. The described hostel type/hotel accommodation will be for the transitory / offshore personnel so is synonymous with the temporary accommodation unit / in-transit accommodation unit. For longer term shore-based

Reference	Request for information	Navitas response
		personnel, houses will be procured. The EOI for this requirement was issued in the Penguin News in February 2024 and should the Sea Lion development be approved, further action shall be taken on this requirement. Navitas will ensure that this is explained in the post consultation EIS.
DMR 97	Page 205: The assume Stanley Potable water supply limit (82m³/day) is confusing the readers at this point in the document as it is not explained that this is the unused supply capacity until chapter 11. It would also be helpful if existing demand could be explained here so the impact of the additional demand can be put in context.	Thank you for your comment. This is noted and details will be added.
DMR 98	Page 206: The waste treatment facility is not yet under construction.	Thank you for your comment. This is noted and the text will be amended.
DMR 99	Page 207: The average water usage figure for personnel and accommodation in table 5.27 (70m³/day) equates to 233 people at 300 litre per person per day. This is far higher than the maximum number of people expected to be onshore at any given time in table 5.26 (26 permanently onshore, 74 temporarily onshore and 62 in transit). The same comment applies to table 11.23 on page 989.	Yes, this includes offshore personnel as well (to account for a worst case in the event of a 'down man'). Otherwise, water will be mostly made up offshore by watermakers on the MODU/FPSO for personnel use. A note will be added to the table to clarify.
DMR 100	Page 209: “Waste Management Strategy” – should this be “Waste Management Plan” in line with language elsewhere (assuming it is the same thing).	Thank you for your comment. At the current time, Navitas has developed a Waste Management Procedure which has been submitted to FIG for review. This procedure will be used to develop project-specific Waste Management Plans which will be tailored to each operation in line with the current infrastructure on Island and in line with relevant FIG / UK legislation. Navitas accept the comment and will update the EIS (Section 3.2.18 and Chapter 10.11) to ensure consistency of language.
DMR 101	Page 213: The legislation referenced should be the Offshore Minerals Ordinance 1994 rather than the Offshore Minerals Ordinance (Amendment) (2011).	Thank you for your comment. This is noted and the text will be amended.
DMR 102a	Page 230: Section 3.2 does not appear to refer the extent of liability in relation to CTTs.	Thank you for your comment. Navitas OMS Elements 5 (Operations Management) and 6 (Production Management) are relevant to offtake operations between the FPSO and the Conventional Trading Tanker (CTT). Furthermore, EIS 5.10 provides detail on the Navitas Assurance Process for purchasers' tankers and indicates that a dedicated berthing crew will board the CTTs for each offtake to ensure competency and

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		consistency of the operation, aligned with Navitas' agreed offtake operating procedures. The Conventional Trading Tanker itself is not under Navitas direct control or liability, and the field operator will not have title or liability for the crude transferred once it is discharged from the offloading flange on the FPSO. In the event of an incident involving the CTT, the liability would sit with the crude offtaker/tanker owner and would be covered by the tanker P & I Club Cover, and insurance under CLC 1992.
DMR 102b	Page 230: The "Disturbance to fisheries spawning grounds and migration routes" row references section 0.	The 'find and replace' function in Word indicates there are no occurrences of 'Section 0' . This error may have occurred in the transition to PDF. This will be checked and any cross-referencing errors will be corrected.
DMR 103	Page 244: Figure 7-1 is very low quality and the text barely legible in places	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 104	Page 246: The link to the SAERI data portal does not work (possibly as the portal is offline?)	Thank you for your comment. This is noted and the link is restored. The portal is now working.
DMR 105	Page 246: The final paragraph references "survey data" being shown in figure 7.6. It might be more accurate to describe this as "survey information".	Thank you for your comment. This is noted although 'data' is considered to be a suitable description as it contains information on species and sediments.
DMR 106	Page 249: It would be useful to add to the key for figure 7-5 to state what the lighter blue box is in the left-hand map (which the middle map is presumed to be a zoomed in version of).	Thank you for your comment. The light blue box are actually light blue dots representing survey stations and are listed in the key.
DMR 107	Page 250: Figure 7-6 is very low quality and the text barely legible in places	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 108	Page 254: Reference is made to the IMS-GIS Data Centre, but it is not explained what it is.	Thank you for your comment. The acronym refers to 'Information Management System and Geographic Information Systems' Centre. This will be added to the text.
DMR 109	Page 256: It is assumed the minimum temperature should be -5.1ºC not 5.1ºC	Thank you for your comment. This is noted and should be -5.1ºC. The text will be amended.
DMR 110	Page 256: The figure given for mean annual rainfall (2,856mm) seems very high – annual figures from 1930 to 2010 were between ~400 and	Thank you. This will be corrected to 285.6 mm.

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	~860mm (is the figure a total over the three years of records rather than an annual mean?). Figure 7-12 suggests an annual average of around 20-40mm/month, which would be around 240-480mm a year.	
DMR 111	Page 259: The text states October has 21mm of rainfall but the figure shows it as being 20mm.	Thank you for your comment. This is noted and will be changed in the text.
DMR 112	Page 265: Some of the text in figure 7-14 (particularly the light grey labels in the map) is barely legible. The key mentions "QC stations" but this is not explained.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 113	Page 266: Figure 7-15 is very low quality and the text illegible in places.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 114	Page 267: Figure 7-16 is very low quality and the text illegible in places.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 115	Page 271: The text states that seabed currents are typically less than 10cm/s but figure 7-21 shows a large proportion of currents are in the 10-15cm/s range.	Thank you for your comment. This is noted and the text will be amended to 5-15 m/s.
DMR 116	Page 272: Figure 7-22 is quite hard to read.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 117	Page 274: The text states that wind speeds are typically less than 10m/s but figure 7-24 shows a large proportion in the >10-15m/s range.	Thank you for your comment. This is noted and the text will be amended to 6-12 m/s.
DMR 118	Pages 281-287: The low quality of figures 7-26, 7-28, 7-29, 7-30, 7-31, 7-32, 7-33 and 7-34 means the numbering of the stations marked by red or blue dots is illegible. This means the text in the section referencing certain stations cannot be cross-referenced.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 119	Page 290: The text in the summary column on first row on page 290 appears to be a duplicate of the row beneath.	Thank you for your comment. This is noted and the typo will be corrected.

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DMR 120	Page 292: There is no annex C to schedule 4 of the OMO. The information is just in schedule 4. This comment also applies to section 8.4, page 532.	Thank you for your comment. This is noted and the text will be amended.
DMR 121	Page 300: Should the list also include the EIA on offshore underwater noise? On page 657 it is stated that invertebrates including crustaceans are potential receptors, while on page 663 it is stated that mussels are affected by noise.	Thank you for your comment. This is noted and will be reworded for clarity.
DMR 122	Page 300: Is the GAP project still ongoing? We understand it to have finished after GAP II.	Thank you for your comment. The GAP project has now finished - text will be amended to clarify.
DMR 123	Page 303: Should the list also include the EIA on inshore underwater noise?	Thank you for your comment. This is noted and will be reworded for clarity.
DMR 124	Page 313: The first number in the table should be 21,613.9 not 21.613.9	Thank you for your comment. This is noted and will be amended.
DMR 125	Page 316: Figure 7-42 is very low quality and the text illegible in places.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 126	Pages 318-319: Figures 7-44 and 7-45 are low quality and the text barely legible in places.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 127	Page 324: The first confirmed vessel landing in the Falklands occurred in 1690 (17th century)	Thank you for your comment. This is noted and the text will be amended.
DMR 128	Page 328: The first section of table 7.8 is on NFB and the Sea Lion Field, but the cell containing the summary of the offshore benthic flora and fauna row is about Berkeley Sound (it is an exact copy of the summary of the Berkeley Sound Deeper water flora and fauna four rows below).	Thank you for your comment. This is noted and will be corrected.
DMR 129	Page 335: It is stated that southern rock cod Is currently the most abundant finfish on the Falkland Islands shelf. However, this is outdated and the most abundant finfish is now the common hake.	Hake is the most important catch however rock cod remains abundant, text will be amended.
DMR 130	Page 339: “Within the kelp P. cornucola inhabit the benthos particularly in algal litter” doesn’t seem to make sense.	Thank you. Navitas think it doe make sense but will amend to make clear. Note algal litter is found on the benthos in areas of low energy.
DMR 131	Page 347: Note three on table 7.12 states “The species names relating to the species codes are found in Section 7.4.5.2.3”, but they are not given	Thank you for your comment. This is noted and the Section reference will be amended.

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	in that section. It would make this table easier to read if species names could be written out (accepting this would need a reduction in font size).	
DMR 132	Page 348: Section 1.4.5.3.1.3 and table 1.13 are referenced but do not exist.	Thank you for your comment. This is noted and the text will be amended.
DMR 133	Page 352: It would be useful context to add the Sea Lion location to the maps in figure 7-48.	Thank you for your comment. This is noted and will be added.
DMR 134	Page 353: There seems to be a numbering/formatting error in the paragraph beneath the one on GPS tags.	Thank you for your comment. This is noted and will be amended.
DMR 135	Page : In the penultimate paragraph it mentions figures 7-49, 7-50 and 7-51 show animal tracking. It should be 7-50, 7-51 and 7-52.	Thank you for your comment. This is noted and will be corrected.
DMR 136	Page 354: It is stated that "rockhopper penguins, which foraged beyond the Patagonian Shelf and slope during incubation, in water > 600 m deep". Is this correct, as figure 7-50 suggests that it is during the chick-rearing stage that they do most foraging in the deep water (the incubation period map only has a very small number of trips into deep water)?	Thank you for your comment. This is noted and the text will be corrected.
DMR 137	Page 359: The label of the map in the upper right of figure 7-52 should read "Elephant seal" rather than "Elephant sea"	Thank you for your comment. This is noted and will be corrected.
DMR 138	Page 362: The section on white chinned petrels states they are in decline twice in one sentence.	The typo will be corrected.
DMR 139	Page 371: Footnote 2 has been improperly formatted in the header row to appear the same size as normal text.	Thank you for your comment. This is noted and will be corrected.
DMR 140	Pages 378-379: Figures 7-60 and 7-61 are low quality and some text barely legible	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 141	Page 382: Note three on table 7.19 states "The species names relating to the species codes are found in Section 7.4.5.2.3", but they are not given in that section. It would make this table easier to read if species names could be written out (accepting this would need a reduction in font size).	Thank you for your comment. This is noted and the correct section will be referenced.
DMR 142	Page 383: Regarding the statement "There is some evidence that food availability has been poor in the 2015/16 season", could this be cross referenced with fishing catch data for that year?	The statement about food availability relates to the cited FISMP report (Crofts and Stanworth 2017), and the observed low breeding success and starvation in moulting adult penguins. There are no studies that link fishery catch to low breeding success and starvation in penguins. Fishery

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		catch is not necessarily a useful or relevant index of penguin food availability.
DMR 143	Page 384: Table 7.20 shows an increase in the number of Gentoo pairs at Cow Bay between 2010 and 2022, but the final column states there is decrease since 2010. Similarly, there was a large decrease in the number of Gentoo pairs at Volunteer Point but the final column states the population was steady since 2010. The footnote is confusing as the column header states "since 2010" whereas the footnote suggests the trend is since 2015. The trend for Rockhoppers at Diamond Cove suggests a stable population despite a 35% decrease in pairs since 2010, while the trend for Kings is steady despite a 31% increase in the number of chicks.	The EIS Table 7.20 is correct. The table shows the long term trend (1995-2022) and short term trend (2010-2022). The 2010 versus 2022 counts, may appear to contradict the population trend in the table (stable, increase or decline). However, comparing two years (e.g., 2010 versus 2022), is not the same as a trend over time (e.g., 12 years between 2010 and 2022). Navitas will update the Table footnote text to avoid confusion over time period.
DMR 144	Page 388: It is stated that the Imperial Shag is "by far the most abundant species recorded during the winter months" but its winter population is much smaller than several other species It was by far the most abundant species in summer – is this what it should have said? The meaning of the sentence "So although imperial shags were not observed on the coast in the winter, they are still abundant within inshore waters during the winter months" is also unclear.	Thank you for your comment. This is noted and the text will be updated to clarify summer and winter abundance of shags.
DMR 145	Page 396: Table 7.23 gives the Falkland population of Sooty shearwaters as 100,000 pairs, 0.5% of the global population; elsewhere in the document the figure is given as 139,000 / 0.1%	Thank you for your comment. This is noted and the text will be checked for consistency and corrected where relevant.
DMR 146	Page 399: Table 7.23 states that the global population of tussac birds is unknown but the report also states that they are endemic to the Falklands – would this not mean that the global population is the same as the Falklands population (c. 15,000-28,000 pairs)?	Thank you for your comment. This is noted and the text will be corrected.
DMR 147	Page 400: There is a footnote 3, but no use of it in table 7.23.	Thank you for your comment. This is noted and will be corrected.
DMR 148	Page 401: Are the Poncet surveys still ongoing?	Yes, these are annual surveys.
DMR 149	Page 404: The figure of 291 mortalities in 2022 does not seem to align with table 7.25.	Thank you for your comment. This is noted and will be corrected.
DMR 150	Page 405: The figures in table 7.25 do not seem to align with the text in page 404, which states that it is assumed there is one mortality for every three heavy contacts; in the first row the number of mortalities is 20 times	Having re-checked the 2019, 2020, and 2022 Bulletins (seabird mortalities were not reported in 2021), the number the commenter is referring to seems to the 291 mortalities in 2022, vs 875 mortalities for 2022 in the

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	higher than the number of contacts, whilst for Loligo, the number of extrapolated mortalities is three times the actual. If the numbers in the table are correct, can the discrepancy/workings be explained?	table. 875 is correct, and the text will be amended for clarity. The error came from exploration of the 2022 data where heavy contacts were not reported explicitly, and so when exploring the basis of for extrapolated numbers, 875/3 = 291, which was mistakenly used in the text.
DMR 151	Page 406: The final sentence states that "Table 7.26 shows the species listed under ACAP that occur within Berkeley Sound waters" (eight species) but the table is actually about the Falkland Islands in general rather than Berkeley Sound (it lists 12 species and includes the BBA as a 'common breeder' despite it not breeding in Berkeley Sound).	Thank you for your comment. This is noted and will be amended.
DMR 152	Pages 409-412: Figures 7-73 to 7-76 are low quality and some text barely legible	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 153	Page 421: The final paragraph of the section ends with an incomplete sentence: "During this period an increased but small number of…"	Thank you for your comment. This is noted and will be corrected.
DMR 154	Page 421: How do observations mitigate the impacts of seismic surveys?	MMOs keep watch for any marine mammals in the area. If any marine mammals are seen means the surveys are not allowed to take place, as per the JNCC Guidelines. Of note, no seismic surveys are planned.
DMR 155	Page : In the sentence "The concurrent survey within Licence Block PL001 was conducted other a period of 109 days", presumably "other" should be "over"	Thank you for your comment. This is noted and will be corrected.
DMR 156	Pages 422-427: Is there a reason there are distribution maps for some species (e.g. Peale's dolphin) but not others (e.g. killer whales)?	Killer whales were very rarely observed and therefore distribution maps were not possible.
DMR 157	Page 423: Does the statement that "Acoustic detection of sei whales is further hampered by the absence of sei whale call descriptions for the South Atlantic" take into account the recent research by Caroline Weir?	This has been looked at by Cerchi and Weir (2022). It would seem that juvenile leopard seal calls and sei whale vocalisations may be similar but Cerchi and Weir (2022) consider that they are sei whales. However the conclusions are not categoric and will require further research. Navitas will reference the recent research in the post consultation EIS.
DMR 158	Page 429: It would be useful if the key of figure 7-88 included an explanation of the difference between maps A and B. The key's wording is also a little odd saying "South American fur seal, predicted habitat use (predicted presence) breeding on the Falklands" instead of "Predicted habitat use (predicted presence) of South American fur seals breeding on	Thank you for your comment. This is noted and the text will be clarified.

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	the Falklands". There is also a repetition of text in the key, with "(2019). The pink dot represents the drill centre" appearing twice.	
DMR 159	Page 430: The key for figure 7-89 has the same wording issue as 7-88 (saying "Southern elephant seal, predicted habitat use (predicted presence) breeding on the Falklands").	Thank you for your comment. This is noted and the text will be clarified.
DMR 160	Page 430: It is stated that table 7.28 "provides a summary of marine mammal abundance in the NFB, distribution, life-cycle and behavioural characteristics" but it only lists cetaceans and does not include pinnipeds. Was there supposed to be one including pinnipeds?	Thank you for your comment. This is noted and pinniped data will be included.
DMR 161	Page 434: It is mentioned that there was an influx of southern right whales in 2017 and then states that "Whether this is simply an unusual year or the start of a long-term trend is yet to be determined" As there have been six winters since then, is data not available to determine this trend? The same comment is applicable to the southern right whale part of section 7.4.6.3.1.6 on page 449.	Thank you for your comment. This is noted and the text will be updated.
DMR 162	Page 443: Figure 7-95 is not referenced in the text.	Thank you for your comment. This is noted and the reference will be added.
DMR 163	Page 444: It would be useful to mention how the number of sightings was translated into the estimated population given in table 7.31, particularly as the numbers of sightings and population do not appear to be proportional.	There is a ratio between sightings, dive (submergence times) and population estimate. The ratio is different for each species. The text will be amended for clarity.
DMR 164	Page 447: In the genetic diversity section, the first two bullet points appear to be contradictory, saying there were highly significant differences in the first point and saying there was no evidence of population differentiation in the second.	Thank you for your comment. This is noted and will be clarified in the text.
DMR 165	Page 457: There is also a sea lion haul-out site on Cochon Island.	Thank you for your comment. This is noted and will be added.
DMR 166	Page 461: The section references "priority conservation habitats (Section 7.5.2.4)", but the section in question is titled "Threatened terrestrial Habitats". Similarly, it references "three priority conservation species" but the section referenced (7.5.3) is titled "Threatened species".	Thank you for your comment. This is noted and will be corrected.
DMR 167	Page 463: Mallard ducks should be listed in the first bullet point as they also have no protection. Arguably the birds in the second bullet point are protected, albeit only for part of the year.	Mallard ducks are not listed, because they are infrequently sighted. For example, Woods and Woods (1997) report one Mallard duck at Goose Green in 1994. They were not reported by White et al. (2002), nor during extensive coastline monitoring surveys around Stanley Harbour and Cape

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		Pembroke (Poncet 2021). Regarding the second bullet, the text will be amended for clarity.
DMR 168	Page 467: It is stated that NNRs are established under 1999 regulations but table 7.34 lists several that were established in the 1960s or 1970s.	Navitas understand that the NNRs established prior to 1999 were retrospectively included in the 1999 ordinance. See Conservation of Wildlife and Nature Ordinance 1999, 13(2).
DMR 169	Page 478: The low resolution of image 7-111 makes the key hard to read (is red high, purple medium?).	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 170	Page 481: Some of the colours used for the key are too similar and hard to distinguish on the map. It might be helpful to add labels to the sections of each colour to allow readers to identify them.	Navitas notes DMR's comments and will review the post consultation EIS to ensure that the colours can be clearly distinguished and/or labels are added.
DMR 171	Page 482: Stanley is now a city rather than a town.	Thank you for your comment. This is noted and the text will be amended.
DMR 172	Page 485: The statement "Patagonian rock cod has increased in importance over recent years" is not correct anymore – it hasn't been important for the last eight years after the huge drop in catches between 2015 and 2016. The timeline of the statement "experiencing 20-30 fold increase in catches" needs adding for it to make sense in the context of table 7.41, which only shows data since 2013. The statement that it "represented only 5.2 % of the catch in 2022" is incorrect. It was only 0.5% of the catch in 2022.	Text will be amended to: "Patagonian rock cod has previously been an important commercial species but has decreased in importance since the drop in catches in 2015-16. From 2016 the catches of this species have decreased significantly and represented only 5.2 % of the reported catch between 2013 and 2022.'
DMR 173	Page 487: The third paragraph is a repeat of text midway through the second paragraph.	Thank you for your comment. This is noted and paragraph 3 will be removed.
DMR 174	Page 488: This section is about fisheries operating in the approaches to Berkeley Sound but the third sentence refers to a map of the sea lion field (figure 7-115). Presumably this sentence should have been in the section above (7.7.3.1.1.1) or figure 7-115 should be a map of the loligo fishery squares around Berkeley Sound.	Thank you for your comment. This is noted and the text will be amended.
DMR 175	Page 491: It is not clear what the purpose of the sentence "A summary of all vessel use in Berkeley Sound is provided in Section 7.7.3.2.5" is.	This is to refer the reader to an overview of the vessel usage in Berkeley Sound, which is presented in section 7.7.3.2.5., this highlights the seasonal nature of the cruise ship season, which is mentioned above.
DMR 176	Page 491: It is stated that "the summary of all vessel use in Berkeley Sound (Section 7.7.3.2.5) shows that there is very limited use of Berkeley	Thank you for your comment. This is noted and the reference will be removed.

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	Sound by military vessels", but section 7.7.3.2.5 does not break vessels down by type.	
DMR 177	Page 491: The "(see Section 7.7.3.2.5)" is irrelevant as the section in question does not break vessels down by type.	Thank you for your comment. This is noted and the reference will be removed.
DMR 178	Page 494: Regarding table 7.44, presumably the huge decrease in vessels in Stanley Harbour in 2022 (compared to 2018) is due to COVID, but this is not stated anywhere in the section to give context (it is in section 11.2.4.2.1.1). 2023 data may be more useful if available. The same applies to table 7.45 (page 496) and every sub-section of 7.7.4.1.4 on pages 495-497.	Thank you for your comment. This is noted and detail will be added to Tables 7.44 and 7.45, and section 7.7.4.1.4 to this effect.
DMR 179	Page 495: The text states that "2015 fishing vessel data is presented" but table 7.45 has figures for 2014/2018/2022.	This should refer to Figure 7-117, which shows the higher number of vessels withing Berkeley Sound during the 2014-15 season. This will be amended.
DMR 180	Pages 494-496: Tables 7.44 and 7.45 do not appear to be consistent. For example, table 7.44 show 0 tankers entering Stanley Harbour in 2022 but table 7.45 states that 13 tankers docked at FIPASS in 2022. Similarly, 7.44 shows 1 cargo ship visit to the Harbour in 2022 but 7.45 states there were 25 vessel visits to FIPASS.	This data was provided by FIMA. They confirm that the vessel's destination is recorded (i.e. if it is anchoring in Stanley Harbour, it is recorded as Stanley Harbour but if it is just transiting the harbour to get to FIPASS, its location is recorded as FIPASS). So the tankers recorded at FIPASS will have transited Stanley Harbour and Port William to reach FIPASS but as this is a relatively short transition it is not recorded by the Harbour Authority. This will be footnoted in the text for clarity.
DMR 181	Page 497: It is not clear why table 7.44 is referenced.	Thank you for your comment. This is noted and the reference will be removed.
DMR 182	Page 497: All of the main road between Stanley and MPC is now asphalted.	Thank you for your comment. This is noted and the text will be amended.
DMR 183	Page 499: The reference to figure 7-113 should presumably be to figure 7-120 instead?	Thank you for your comment. This is noted and the text will be amended.
DMR 184	Page 507: Presumably the lower-than-expected fall-back and general increase in electricity usage is linked to the increased number of homes/other buildings?	This would be a fair assumption yes.
DMR 185	Page 508: The footnote references in the table header are the same size font as the header, which could be confusing. Is there a reason the table does not include 2022/23 figures (which are given in the text on page 506)?	Thank you for your comment. This is noted and the footnote references and base year references will be amended. The 2022-23 figures were missed in Table 7.49 in error, these will be added.

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	The first cell of the final row states that 2012/13 s the base year, but the third cell states that 2013/14 is.	
DMR 186	Page 511: Agriculture is the third largest employment sector according to the 2021 census.	At the time of writing, census data tables and specific data requests were kindly provided by FIG Policy, Economy and Corporate Services prior to the census being issued. These showed Agriculture as the fifth biggest employer in the islands. It is understood that a lot of work was put into accounting for those not present on census night to reflect the FI's stats more accurately - could this account for the change from fifth to third? However, as this is not what was reflected in the 2021 census once published, the EIS will be amended to reflect the published census figures.
DMR 187	Page 519: Were there any vessels in Berkeley Sound at the time of the sound recording? It would be useful to state this for context as to whether the 'background' noise level includes vessels.	It was not recorded whether there were any vessels in Berkeley Sound during the baseline noise recordings, this will be checked against the FIMA data to see whether there would have been any vessels in Berkeley Sound at the time, and this will be noted in the document.
DMR 188	Pages 525-527: The dark blue table headings with black text are hard to read and would benefit from the text colour being changed to white.	These will changed to white in the post consultation EIS.
DMR 189	Page 525: The key for table 7.57 does not match the colours used in the rest of the table. Two cetacean species are listed as endangered (not one); sei whales and blue whales	Thank you for your comment. This is noted and the text will be amended.
DMR 190	Page 527: "Patagonian long-finned squid" should be "Patagonian rock cod"	The text will be revised in the post consultation EIS.
DMR 191	Page 530: Is a bird strike due to light outwith Navitas' control if is due to the presence of lights (as lights are within control to some extent)?	Navitas recognise that the use of light is a planned activity and that this will definitely have the impact of attracting birds. It is also recognised that the 'planned' vs. 'unplanned' usually refers to the activity rather than the impact itself. However, after considerable internal discussion and debate, the decision to consider bird strike a risk rather than an impact was taken so that the likelihood of occurrence could be factored into this particular impact. Within the risk assessment, the impact and the risk largely came out the same, with the exception of small scale strikes in Berkeley Sound. Here the impact was considered Low but given that the 'likelihood of occurrence' was 'Likely', the overall risk was considered to be Moderate

Reference	Request for information	Navitas response
		and was therefore considered significant ensuring it would be flagged for monitoring and an EMMP action. Nonetheless, as stated above, there was some internal debate on this particular approach.The risk of bird strike was considered to be unplanned so that the likelihood of occurrence of mass bird strikes could be factored in. Within the risk assessment, impact and risks are largely the same with the exception of small scale strikes in Berkeley Sound, where the impact was considered low but given that the likelihood of occurence was 'likely' the overall risk was moderate and therefore significant. Navitas do not consider the FPSO to be over illuminated over and above minimum safety requirements. Navitas have also committed to constraining the outward facing lighting. See also response to RSPB 8 - e and f.
DMR 192	Page 535: The hyperlink in note 8 does not work.	Noted. Navitas apologise that this link no longer works and while revisiting the soil/seabed sensitivity Navitas has also now included reference to the IEMA 2022 guidance to ensure it is up to date with current thinking. The footnote will be amended to: Adapted from: Link and IEMA (2022).
DMR 193	Page 539: Elsewhere in the document the field life is stated to be 30 years rather than the 23 stated several times in table 8.2.	Thank you for your comment. This is noted and the text will be amended.
DMR 194	Page 540: It looks like there is meant to be a footnote against the UK EA screen out threshold but there is not one visible.	Thank you for your comment. This is noted and the link will be changed to: https://www.gov.uk/guidance/air-emissions-risk-assessment-for-your-environmental-permit.
DMR 195	Page 553: For the risk of introducing non-native species, one offsetting proposal could be the development of an eradication programme, subject to viability.	Noted, thank you for the suggestion. EIS Section 8.11.2.2 discusses Indirect Offsetting. Pest and invasive species eradication/control is listed as one of the potential indirect offsetting initiatives. Navitas will update table 8.9 in the post consultation EIS to clarify that where direct offsets have not been identified, indirect offsetting will be undertaken.

Reference	Request for information	Navitas response
DMR 196	Page 554: DMR's view is that an internal Navitas fund is not appropriate. DMR would like Navitas to commit to an offsetting studies budget that would be managed by a panel consisting of FIG representatives, Navitas and appropriate Falkland Island stakeholders that would decide which studies to progress, and would also like a clear commitment on the amount of funding provided for studies per annum starting immediately after FDP approval. DMR would also like Navitas to clarify what it considers to be a "meaningful" level of scope 1 and 2 carbon offsetting and commit, and to commit to start putting money into a carbon and biodiversity offsetting projects fund from first oil.	Perhaps the use of the word 'Internal' has been misconstrued - the Fund will be funded internally, but the intent is that the oversight and governance will have FIG and Independent NGO representation as well as independent technical/environmental advisors. Navitas has prepared and submitted a briefing paper to FIG that outlines the intent of the fund. Navitas believe that this aligns with the FIG DMR sentiments in this comment and FIG policy and legislative requirements.
DMR 197	Pages 561-585: Questions regarding the impacts identified in table 9.1: • How does placement of objects on the seabed and large dropped objects (p561) impact the human population? • Why do large dropped objects (p561) not impact the sea bed and soil? • Why does the discharge of chemicals during drilling (p562) impact fish but not marine mammals? • Why was plankton deemed to be impacted by noise from explosives but not benthos (p562)? • Why do the operational discharges listed on page 563 and 564 that impact fish not affect benthos or marine mammals? • Why does the discharge of fluid during valve actuation (p564) impact benthos but not other sea life? • Why does the discharge of hot water (p565) impact plankton but not other life, while subsea heat generation (p566) affects benthos and fish? • Why is underwater noise (p566) not deemed to impact benthos (as on page 663 it is stated that mussels are affected by noise)? • Why does the pilot light flare (p567) not impact sea birds (when other forms of flaring do)? On p596 it is stated that seabirds are impacted by flares. • Why does discharge of liquid waste streams to the sea impact fish and birds but not marine mammals? Applies to both pages 567 and 576 • Why does loss of containment of solid waste or liquid offshore not impact all marine life (solid waste is listed as only impacting birds and mammals while liquid waste only impacts plankton and fish)? Applies to	Thank you for your comment. This is noted and Navitas will check Table 9.1, 9.2 and 9.3 and update where appropriate.

Reference	Request for information	Navitas response
	both pages 568 and 576 • Would a topside release of reservoir hydrocarbon (p571) not also potentially impact commercial fisheries? • Why does a build-up of oil in the top of the PW discharge caisson (p573) impact fish and birds but not marine mammals? • Why do the oil spills due to collisions during offtake or hose rupture (p573) not impact the seascape? • Could the introduction of marine invasive species to Berkeley Sound (p577) impact commercial fisheries if it interferes with loligo reproduction? • Would "Presence of additional personnel on Falkland Islands" (p579) not impact the human population?	
DMR 198	Page 570: The FPSO exclusion zone is 1,250m not 500m	Thank you for your comment. As described in Section 5.5.4 the FPSO will have an exclusion zone of 1,275m. This will be checked and updated throughout the document to check for typos.
DMR 199	Page 591: The text twice makes reference to three LTVs – elsewhere in the document the number of LTVs is given as four	It is expected no more than four LTVs will be utilised to support the project, with a maximum of two LTVs present, anchored in Berkeley Sound, at any one time. All sections will be checked for consistency.
DMR 200	Pages 592-593: The colour of the light is also an influencing factor (as stated on page 610). As this is a known mitigation measure, why is this not considered in 10.1.7?	As indicated in Section 10.1.10.1 and 15.7.2.1, the practicalities of adopting the OSPAR green lighting strategy will be investigated during the project engineering phases as a potential mitigation against bird-strike. As yet green-lighting has not yet been adopted as a definite project-specific mitigation as the investigation is still ongoing.
DMR 201	Page 601: Part of the key for table 10.4 is not legible due to the lack of contrast between black text and very dark blue cell colouring.	Moderate and High text will be changed to white to ensure visibility in the post consultation EIS.
DMR 202	Page 608: Reference is made to "Chapter X" – presumably meant to be chapter 15	Thank you for your comment. This is noted and the text will be amended.
DMR 203	Page 611: It is stated that "The year 2007 was chosen as this represents an 'average' fishing year within the available data range." However, 2007 was an unusually good year and saw the highest total catch between 2001 and 2013.	The figure will be updated where possible from the NOAA database and text added to clarify.
DMR 204	Page 612: The caption of table 10.7 references the NFB but the table includes Berkeley Sound. Should fuelling vessel(s) also be included for Berkeley Sound?	The legend will be updated to include Berkeley Sound and additional vessels included.

Reference	Request for information	Navitas response
DMR 205	Page 620: Does helicopter noise also affect cetaceans when they are at/near the surface?	When they are at/near the surface marine mammals may be briefly affected by helicopter overflight noise but as the helicopters fly over quickly, and at heights over 3400ft (apart from take off and landing)and marine mammals are generally spending lesser amounts of time at the surface (compared to hauled out seals or bird colonies), the impacts are not considered significant and it is not considered further in the assessment. The Sea Lion helicopters will follow the FILFH Guidelines.
DMR 206	Page 626: It is stated that flights between Stanley and the CTT would be "mostly over the sea and should not pose a significant risk to wildlife aggregations onshore." However, they would presumably take a similar flight path as helicopters between Stanley and the FPSO and pass over Seal Bay and close to other very sensitive areas.	Flight paths out to the CTT would be generally similar to those going out to the FPSO but may range slightly further east or west depending on from which direction the CTT is arriving at the field. It is not possible to predict their exact routes at the moment but all flights out to the CTT (as with all Sea Lion helicopter flights around the islands) will comply with the Falkland Islands Low Flying Handbook. Text will be amended to clarify the broad routes, i.e. that they will be similar to those going to the FPSO.
DMR 207	Page 626: Was the Falkland Islands Low Flying Handbook Guidance published in 2015 or 2017? The document inconsistently refers to "FILFH, 2015" and "FILFH, 2017" in multiple places, sometimes on the same page (e.g. pages 627 and 1064).	FICAD confirm the FILFH is updated regularly, the references to this guidance will be updated throughout the EIS as 'FILFH, 2024'.
DMR 208	Page 641: Figure 10-9 is very low quality and text illegible in places.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 209	Page 642: Why is the total for all MODU anchor placements equivalent to 20 areas being disturbed when there are ten anchor placements and ten removals. Will the placements and removals not be the same area being disturbed?	The chapter refers to 20 moves, not 20 locations (10 anchor placements and 10 anchor removal events, albeit in the same areas). The narrative will be updated to clarify.
DMR 210	Page 650: The figures given for the number of losses from mobile unit crane decks does not appear to add up. It is state that there were 0.034 losses per year over a 19-year period, which is equivalent to less than one loss (0.6) over the entire period, which is presumably not correct. Is the figure meant to be 0.034% (i.e. 83 losses)?	The OGP Risk Assessment Data Directory Report No. 434 – 17, March 2010, has been checked and the narrative has been updated from: 'With regard to the likelihood of objects being dropped, data gathered between 1980 - 1999 indicate that in a yearly average of 24,480 lifts from mobile unit crane decks, only 0.034 losses per year occurred (OGP, 2010).' TO: Over a period of 37 years (1970 - 2007), only one dropped object was recorded worldwide from units ranging from FPSO's to semi-submersibles

Reference	Request for information	Navitas response
		(OGP, 2010). This amounts to a frequency of 0.027 incidents per year. According to the OGP (2010) on mechanical lifting failures, the probability of a dropped object from a mobile unit is 0.0000014 per lift. An additional reference has been included: OGP. 2010. International Association of Oil and Gas Producers: Mechanical Lifting Failures. Report No. 434 – 08 March 2010.
DMR 211	Page 664: The sentence "However, it is likely that particle motion is equally important as sound pressure in fish (and invertebrate), perception of sound." does not appear to make sense.	The text will be clarified in the post consultation EIS.
DMR 212	Page 672: As the number of wells, the size of FPSO and CTT arrangements has changed from the previous operator's plans, is using their modelling of scenario 1 (installation of subsea infrastructure and drilling of wells) and 2 (steady state production) still appropriate?	These are snapshots of operations which will be very similar to those in the previous EIS but please note that underwater noise modelling is being further revised and refined with new models. Navitas do not anticipate any change to the impact assessment as the operational footprint is smaller than the previously proposed Premier development. See also FIFD 54.
DMR 213	Pages 674-675: The data in figure 10-12 and table 10.26 does not appear to be consistent. The peak noise levels in the table do not match the ones in the figures (for example, in the figure the peak noise for the tanker is around 192dB while in the table it is around 198-201dB).	Refer to DMR 212.
DMR 214	Page 701: It is stated that "The PK injury thresholds for each marine mammal hearing group are shown in Table 10.23". However, they are in table 10.24.	Thank you for your comment. This is noted and the text will be amended.
DMR 215	Page 715: The Cranford et al. experiment was for ten days. How long does Navitas envisage surface drilling discharges lasting during each individual drilling? If it is a significantly longer period, are there any studies that consider longer-term impacts?	Over the course of the Phase 1 drilling campaign, discharges will occur for a cumulative (but non-continuous) total of c. 286 hrs (11.91 days). For example, drilling a 36' top-hole would result in c. 8 hours of time with muds being circulated and discharged. A few days later, there will be 18 hours of circulation and discharges when drilling the 17 1/2' top-hole. Therefore discharges will occur episodically. This will be similar for the Phase 2 drilling campaign carried out a number of years later.
DMR 216	Page 737: The metocean dataset covers only three years – is this deemed sufficient to cover long-term current changes (for example the occasional	Navitas (then POEPL) acquired metocean data from various sources including modelling and measurements. These data underwent independent peer review to determine that they were sufficient.

Reference	Request for information	Navitas response
	stronger Falkland current that disrupts Loligo fisheries at irregular intervals)? DNR has datasets going back to the mid-1990s.	Specifically, the data sources included: - Dedicated wind, wave and current models from the UK Met Office and BMT Argoss to inform the design and operational criteria. In situ measurements included: - Directional wave data from wave buoy (FOSA 1997-98, Premier Oil 2014 - 16) - Current moorings (FOSA 1997-98, Rockhopper 2011-12) - Winda data from drilling rigs (Borgny Dolphin 1998, Erik Raude 2015-16) Therefore, the metocean data used for the modelling are considered sufficient. Navitas note the comment on data sets held by DNR, however, these are not suitable for the modelling that was undertaken.
DMR 217	Page 743: It is stated that "the impacts associated with other discharges to sea e.g. drill cuttings discharges and ballast water and warm water from cooling systems are described elsewhere in this document as indicated in Table 2.2." However, table 2.2 has no mention of ballast water or warm water from cooling systems.	Thank you for your comment. This is noted and Table 2.2 will be updated.
DMR 218	Page 750: Why are benthos, cephalopods and marine mammals not considered potential receptors to operational discharges?	Thank you for your comment. This is noted and these will be specifically listed in the receptor section although the impact assessment section refers to 'marine organism' collectively to avoid repetition.
DMR 219	Page 751: Regarding the claim that discharging water at depth aiding mixing and dispersion, are ocean currents not slower at depth, and therefore less helpful for mixing and dispersion?	Yes, surface currents can be strong compared to deeper currents due to wind, tides, etc. However, because the ocean is highly stratified, it cannot be assumed that currents are weaker with increasing depth, with each strata having different physical properties (i.e. density) as well as movement where deep water can move in different horizontal directions and speed compared to strata above or below. With respect to discharges, mixing and dispersion is also dependant on the difference in density (combination of temperature and salinity) of the discharged water compared to the receiving water, as well as the amount of water movement and force at which the discharge water is being expelled. The density differential will mean that discharged water will

Reference	Request for information	Navitas response
		either rise or fall, which in itself will cause turbulent mixing irrespective of currents. Considering mixing due to difference in density as well as discharges being expelled into a turbulent ocean, mixing and dispersion is likely to occur very quickly in a highly localised space. This is detailed in 10.7.4.1.2.2 Behaviour and fate of PW discharges.
DMR 220	Page 752: It would be helpful if the reason for the differences in concentrations in water phase in early and late field life set out in table 10.42 were explained.	This is related to declining oil rates and increasing water cut over time and the partitioning co-efficient of the chemicals between the oil and water phase. The narrative will be updated.
DMR 221	Page 758: “the necessary dilution to achieve a No Effect Concentration (NEC) would be reached at <10 to 100 m and usually less than 500 m” does not appear to make sense (it infers that it is always between <10 and 100m, but then states usually less than 500m).	The text will be amended to state: 'the No Effect Concentration (NEC) would usually be reached at <10 to 100 m and always less than 500 m'.
DMR 222	Pages 768-769: The titles of figures 10-30 and 10-31 state that yellow equals 5% risk but the (barely legible) key states yellow is 1-5%. Due to the low quality of the graphics, the distance marker is also barely legible and the depth axis of the lower figures is not legible.	The 5% refers to the worst-case of the yellow range (1-5%). The figure legend will be reviewed in the post consultation EIS to ensure clarity.
DMR 223	Page : The plumes appear to go lower than the maximum depth shown in the lower graphs in the figures. Could the figures be extended so the entire depth of the plume is visible?	The green colouring denotes no significance and the important area to note is the yellow which is the area of 5% risk where risk (EIF) is counted. The rest gives a sense of the shape and structure of the plume.
DMR 224	Page 781: Would the Conservation of Wildlife and Nature Ordinance 1999 not be relevant to thermal discharges given that some discharges will be at up to 90ºC (as stated on page 782) and therefore could cause harm to wild birds (penguins) that approach the discharge outlet.	We understand the comment. We can add the ordinance to the legislation section. However, discharge into 4 degree seawater at the rate designed would mean the hot water would disperse rapidly. Furthermore, Navitas considers that, if there was a tangible temperature gradient then penguins would swim away from any warmer water.
DMR 225	Page 782: There will also be some active heating of subsea infrastructure in certain circumstances (the circulation of hot oil set out in table 5.18)	This was omitted in error and will be added to the sources section in the post consultation EIS.
DMR 226	Page 783: Given the potentially high temperature of some discharges, would cephalopods, marine mammals and sea birds not also be potential receptors as well?	Thank you for your comment. This is noted and these will be specifically listed in the receptor section although the impact assessment section refers to 'marine organism' collectively to avoid repetition.
DMR 227	Page 787: Why are the temperatures at the point of release shown in figure 10-35 (maximum of around 14ºC) so much lower than the temperatures of the cooling and produced water (50ºC and 90ºC) in table 10.53?	These graphs show the temperature difference from ambient seawater around the discharge, not the temperature of the discharge itself. Of note, and as stated in the figure, the high volume of CW and stable plume creates a stable temperature change near the discharge point whereas the small volume of PW is dispersed almost immediately.

Reference	Request for information	Navitas response
DMR 228	Page 796: Perhaps it should be clarified that the Falklands are one of the overseas territories that ratification was extended to.	The narrative will be amended for clarity to explain that: The UNFCCC ratification has been extended to the Falklands Islands but as yet, the Paris Agreement and the need for the NDC has not yet been. In 1992, the UN Framework Convention on Climate Change (UNFCCC) was adopted. It has the objective of stabilising greenhouse gas levels in the atmosphere at a safe level. Of the Territories, Bermuda, Gibraltar, the Cayman Islands, and the Falklands have had UK ratification of the UN Framework extended to them (to 2022). No OT has had the Paris Agreement on climate change extended to them, though in the 2021 Joint Ministerial Council between the UK and the Territories, some expressed an interest: The UK warmly welcomed the ongoing interest from some Overseas Territories in being covered by the Paris Agreement, and confirmed that the UK stands ready to support these Overseas Territories. The Paris Agreement was adopted in 2015 and requires ratifying parties to submit plans for climate action, known as nationally determined contributions, with a view to limiting global warming to 2ºC. Ref: House of Commons Library .2023. International treaties and the Overseas Territories. Research Briefing. 26 January 2023.Number 9707
DMR 229	Page 800: Should a fire on board a vessel be considered for the list of emissions from unplanned or emergency events?	Thank you for your comment. This is noted. Fires are usually dealt with as a safety matter rather than an environmental one. We are not aware of any precedent for including emissions from crude oil fires in an EIS.
DMR 230	Page 811: The figures in table 10.59 and 10.60 appear to be UK only. The UK Greenhouse Gas Inventory, 1990 to 2021 (which is the UK's official annual report to the UN) includes overseas territories like the Falkland Islands – would this be a better dataset to use, especially given that section 10.9.4.3.3 starts with the statement that "Emissions in the Falkland Islands are covered by the UK and must be reported in the UK GHG inventory."	The data used in Tables 10.59 and 10.60 use raw data from the Final UK greenhouse gas emissions national statistics 1990-2021 (DESNZ, 2023b). In error, data from Table 1.1 were used which include only the UK emissions and did not include the emissions listed in Table 3.1. The data will be updated to include all emissions from Overseas Territories and Crown Dependencies and all associated narrative regarding comparisons has been updated accordingly.
DMR 231	Page 814: Emissions from overseas territories and crown dependencies are not included in UK carbon budgets, so it is not clear that discussion of	It is acknowledged that the Falkland Island emissions are reported to the UNFCCC as part of the UK emissions totals, but that UK ratification of

Reference	Request for information	Navitas response
	UK carbon budgets is relevant. This comment also applies to sections 10.9.4.5.5 (p833) and 10.9.6.1.1 (p835).	the Paris Agreement has not yet been extended to the Falkland Islands as an Oversea Territories. Therefore emissions from all OTs and Crown Dependencies are not included within the UK Nationally Determined Contribution (NDC) and are therefore not included in the UK Carbon Budget. At the time of writing there are no budgets assigned to Falkland Islands and there is little guidance on what such allowances may be. However, the Information to facilitate Clarity, Transparency and Understanding (ICTU) which accompanies the UK NDC makes a commitment to 'Updating on the progress made in expanding the territorial scope of the NDC to include the UK's Crown Dependencies and Overseas Territories'. It is anticipated that should the Carbon Budgets be extended to include the OT/CDs, they will not be dramatically increased and the UK Carbon Budgets as they stand have been used as the only point of comparison available at this time. Table 10.62 will be updated with a footnote to explain the above and Navitas will follow all guidance and future legislation that results should the UK ratification of the Paris Agreement be extended to the Falkland Islands.
DMR 232	Page 816: The fourth bullet point in the second cell of table 10.63 starts "d water" – presumably there is a missing word ("heated"?)	Thank you for your comment. This is noted and the text will be amended.
DMR 233	Page 823: The first two hyperlinks in the footnotes do not work.	Thank you for your comment. This is noted and the text will be amended.
DMR 234	Page 833: The percentage figures for NOx and SOx are a little misleading as they are comparing whole project life emissions with annual emissions. It would be better to compare the annual emissions like-for-like.	Agreed. This is a typo as the narrative indicates that the 'worst-case annual baseline Phase 1 & 2' is compared, BUT then the Phase 1&2 total is used, which creates an overestimation of the contribution. The narrative will be updated to reflect the annual NOx and SOx emissions as follows: - NOx = total 34,418 tNOx / 32.6 years = 1,055.76 tNOx per year = 0.15% - SOx = total 1,807 tSOx / 32.6 years = 55.42 tSOx per year = 0.04% Also, the graphic showing the indirect emissions graphically will be replaced with a table showing the actual data over time as taken from Table ES 3 in the Final UK greenhouse gas emissions national statistics 1990-2021.

Reference	Request for information	Navitas response
DMR 235	Page 834: There are more frequent testing thresholds for higher tonnages (e.g. at least 6 months for 50-500 tonnes, 3 months for 500+).	Thank you for your comment. This is noted and the text will be amended.
DMR 236	Page 843: There is some partially-hidden text to the bottom right of figure 10-42.	Thank you for your comment. This is noted and the text will be amended.
DMR 237	Page 846: It is surprising that LTVs are missed off the list of sources of waste.	It is expected that the LTVs will generate very little waste. They shall arrive with their cargo ready to be installed. The small amount of waste that they do generate shall be passed onto the OCVs and field support OSV and has been included in their figures. Dunnage and packing materials which are not transferred over to the other vessels shall be transported back to their point of origin when the vessel returns from the project. Navitas will ensure that there is clarity regarding LTV waste in the post consultation EIS.
DMR 238	Page 849: Is the atmosphere not a receptor (for emissions from incineration, the shipping of waste and landfill)?	It is not the base case that there will be a standalone waste incinerator on the supply base; the base case is that all waste incineration will be handled by the FIG municipal facility. Equally Navitas will not own the landfill facility used for any waste falling to landfill. Therefore, emissions resulting from the combustion during waste incineration, and the emission of methane from landfill sites are included within the GHG Protocol Scope 3, Category 5 emissions and therefore qualify as Scope 1 emissions for those who are managing the waste facilities. While Navitas recognise that the inclusion of the category 11 Scope 3 emissions was the subject of the Surrey vs. Finch Supreme Court ruling, in the absence of formal guidance on the ramifications of this, the emissions associated with waste managed by other parties is considered to be outwith the scope of this EIS. The emissions associated with any shipment of waste back to the UK on returning freighter vessels are included within the vessels emissions captured within Chapter 10.9. If Navitas were to include emissions both from the shipment of waste and arising from local incineration, this would constitute double-counting - the emissions arising from shipping the waste constitute the worst case and these are included in the assessment.
DMR 239	Page 853: The planned incinerator will not be operable in 2024 – more likely to be Q1 2026.	At the time of writing the EIS, the incinerator was anticipated in 2024. An email received from PWD by Navitas on 26th August suggests that it is now anticipated towards the end of 2025. Navitas will update the post consultation EIS accordingly.

Reference	Request for information	Navitas response
DMR 240	Page 860: In table 10.76 the total amount of waste is given as 28,537 tonnes, but the total of the stages is 28,569. This difference seems too large to be accounted for by rounding errors.	This will be checked and corrected in the post consultation EIS.
DMR 241	Page 861: Why are different years' figures used for recycling and landfill rates?	These are the figures reported on the DEFRA website (DEFRA, 2023). Navitas will ensure that consistent years figures are provided in the post consultation EIS.
DMR 242	Page 872: The correct name of the law is "Marine Mammals Ordinance 1992"	Thank you for your comment. This is noted and the text will be amended.
DMR 243	Page 874: The hyperlinks in figure 10-46 do not work.	Thank you for your comment. This is noted and the text will be amended in the post consultation EIS.
DMR 244	Page 876: The text about sei whales appears to be contradictory, stating "Tend to swim just below the surface leaving a clear trail of 'fluke prints'" but then goes on to state that they are "relatively difficult to detect visually" and exhibit "relatively inconspicuous behaviour on the surface".	Both statements are correct but will be reworded for clarity in the post consultation EIS.
DMR 245	Page 876: The sentence "This process that 10 species have populations which trigger global KBA criteria…" does not appear to make sense. Is there a word missing?	Thank you for your comment. This is noted and the text will be clarified in the post consultation EIS.
DMR 246	Page 878: Is the 0.9 on the y axis 0.9% or 90%?	Thank you for your comment. This is noted and the text will be clarified in the post consultation EIS.
DMR 247	Page 885: Is there more recent data on port visits than 2014?	Yes and the section reference will be added in the post consultation EIS.
DMR 248	Page 916: Earwigs first appeared in the Falkland in the 1990s according to SAERI.	The exact date is not known. SAERI has commented to Navitas that, anecdotally, it is likely they arrived in the mid 90s.
DMR 249	Page 918: It is stated that "The TDF will be equipped with monitoring devices and equipment to clean any cargo that does not meet the specified standards." Will it have a designated cleaning area where runoff from cleaning is captured for disposal rather than potentially entering waterways?	Thank you for noting this. This is an error. In accordance with Navitas' shipping instructions and Biosecurity Management Plan all imported goods / cargo will be inspected and treated prior to departure from their point of loading. However, in the unlikely event of an incident the supply base (not the TDF) will have a dedicated biosecurity area where non-conforming cargo can be quarantined, inspected and treated. Any waste generated from this exercise will be dealt with in accordance with the operational Waste Management Plan. The (currently draft) waste management procedure will be upgraded to an operational waste management plan prior to operations commencing. A biosecurity plan will

Reference	Request for information	Navitas response
		also be prepared pre operations. In the event of a biosecurity incident, FIG Biosecurity will be informed and asked to advise on required treatment and disposal. A dedicated biosecurity bin can be provided in the supply yard waste area to ensure appropriate segregation and disposal. The post consultation EIS will be updated to ensure that the narrative discussing biosecurity monitoring and management is clear. See also SAMS 24.
DMR 250	Page 926: The third paragraph refers to table "11." which is presumably meant to be 11.1.	The typo will be corrected in the post consultation EIS.
DMR 251	Page 926: The note states that "other impacts associated with vessel use, competition for resource and the installation of subsea infrastructure etc. are described elsewhere in this document, as described in Table 11.1" but table 11.1 does not state where these are described. Should this refer to table 2.2 instead?	The typo will be corrected in the post consultation EIS.
DMR 252	Page 932: As well as damage to subsea infrastructure, should oil spillage be added a potential outcome/impact of snagging of fishing gear from trawlers? Same comment applies to table 11.8 (page 942).	The Jee report (2013) presented in the EIS concluded that there is negligible risk of snagging with subsea infrastructure and that there is, therefore, no need to make the subsea infrastructure over trawlable. The risk of loss of hydrocarbons is negligible and is therefore not assessed further.
DMR 253	Page 949: Why has a different analogous ship been used for OCVs for offshore (Skandi Skansen) and inshore (Seven Arctic Inst vessel)? Why has a different analogous ship been used for PSVs for Stanley Harbour and Berkeley Sound (the one for Stanley Harbour (Pacific Leader) is the same one listed for offshore comparison)?	These vessels are all similar and it is important to have a range of vessels (albeit limited) to provide the comparative information. For example there are over 400 suitable PSVs in the global market for this project. Availability, locality, maintenance record, environmental features and commerciality will all come into the mix when selecting the vessels and so providing a couple of analogous vessels throughout the EIS should not be a concern and reflects the depth of the market and Navitas' experience.
DMR 254	Page 950: 2023 vessel visit data be better (if available) than the COVID-affected 2022 data. 2022 is not an appropriate baseline.	2023 data will be requested and included in the post consultation EIS.
DMR 255	Page 951: It is stated that "the annual variation is related to the catch recorded in the Illex jigging fishery which has varied hugely over the past ten years; from virtually zero in 2009 to almost 200,000 tonnes in 2021 (FIG, 2023) (Table 11.15)." However: • Table 11.15 does not include data for 2009 (it only goes back to 2013). • The highest catch on the table was in 2015 (357,722 tonnes)	Navitas will clarify in the text in the post consultation EIS.

Reference	Request for information	Navitas response
	• 2021's catch was 172,537 tonnes, which is probably not correctly described as "almost 200,000"	
DMR 256	Page 965: The statement that "socio-economic impacts are out of scope for this EIS" is contradicted by the statement later on the same page that "the social impacts of competition for resources such as accommodation was considered to be within the scope of the EIS". This comment also applies to section 11.4.1 (page 979) and 11.7.1 (page 1017)	As noted in section 6.2.2.1.1, discussion with FIG in 2015 determined what socio-economics aspects should be included in an EIS. Socio-economic impacts were considered out of scope but social impacts were included. This is reflected in the FIG Hydrocarbons Environmental Impact Assessment Guidance Note (2016). The post consultation EIS text will be reviewed to explore whether it can be made more clear.
DMR 257	Page 971: Does Navitas believe there is sufficient time to identify and purchase a site and then build the hostel-type accommodation before operations start?	Navitas has already engaged with local supply chain regarding accommodation requirement and issued an expression of interest to gauge interest, capacity for construction and availability of land. The accommodation can be constructed in a phased fashion, so that not all of the requirement needs to be available at the outset. There are temporary pre-fabricated solutions that can be deployed in the early stages if there is a challenge in constructing more permanent accommodation solutions prior to the commencement of operations. These have been deployed successfully for previous exploration campaigns.
DMR 258	Page 974: DMR disagrees that the significance of the impact on housing is low. There is a severe housing shortage and even only 26 additional homes is still equivalent to 2% of the 2021 level (1,148).	Rather than increasing pressure on existing (limited) supply, Navitas is committed to the construction of additional accommodation units to meet its direct housing requirement, therefore we consider the rating appropriate. The measures being taken to accommodate the workers have been taken into account when considering the severity of effect. As the addition of accommodation required by Navitas is only 2 % change, the assessment looks at the worst case and is precautionary, Navitas feel the assessment is appropriate. Currently the assessment is sensitivity Low 'The receptor is tolerant of change without detriment to its character, or unacceptable to a handful of stakeholders' and Severity Minor: 'Short-term minor impact on livelihood and/or health, inconvenience of resource use, minor levels of disturbance to local pop, concern to a handful of stakeholders'. Wider aspects of the impact of the development on accommodation are considered in the SIA.
DMR 259	Page 981: Would the natural environment also be a potential receptor if more water needed to be extracted for use in Stanley?	This section of the EIS focusses on the competition of a resource (water) on the human population. As such, the natural environment would not be considered a receptor in this case. The volume of water to be extracted

Reference	Request for information	Navitas response
		from the natural supply is managed by FIG and Navitas will be one of many end users.
DMR 260	Page 981: The number of Stanley households is 1,148 (not 1,147) according to the census figures.	At the time of writing, census data tables and specific data requests were kindly provided by FIG Policy, Economy and Corporate Services prior to the census being issued. The census data tables sent through by FIG prior to the census being published noted 1,523 resident households (1,147 in Stanley). this will be updated to reflect the final census report numbers.
DMR 261	Page 989: Why is the estimated water use for MODU drilling and vessel requirements so much lower for the project than the 2015 exploration?	This difference arises because the 2015 exploration wells were drilled with WBM and the development wells are to be drilled with NADF. This is noted in Table 11.22, Navitas will add a reference so this is clearer.
DMR 262	Page 1002: Is the heliops hangar for Sea Lion expected to be the same size as the one used for the exploration campaign? What if SAR operations also have to be provided from Stanley Airport (if MOD will not agree to Navitas using theirs)	Full specification/design of the helicopter hangar to be determined, but it will be designed with sufficient capacity to store and maintain the airframes anticipated. The hangar is expected to be of a similar size to the RUBB hangar that serviced the 2015-16 exploration campaign at Stanley Airport. That hangar housed 2 crew change helicopters and a dedicated SAR airframe (SAR was not provided by the MoD in the 2015-16 exploration campaign). As such a hangar of this size would be capable of meeting maximum anticipated airframe storage requirements.
DMR 263	Page 1005: Why have roof-mounted solar PV panels not been considered as a way of reducing demand on grid power, especially given the highest power demand (midday) correlates with peak solar radiation?	PWD Power Station indicated to Navitas their view that individual roof mounted solar panels are not optimally compatible with Stanley's existing power generation and distribution infrastructure. This is because any excess energy generated by these cannot be easily absorbed/disposed of, nor can the spikes in demand created on dull days in which the panels are less efficient be accommodated by grid power generation. This situation will be monitored in close consultation with FIG as the project progresses and as power generation and distribution infrastructure and technologies advance.
DMR 264	Page 1010: Presumably personnel will also need air transportation mid-contract for holidays etc, rather than just at the start and end of contracts?	To present the worst case scenario that the EIS figures have been based on, all positions (other than the Country Manager role) have been made rotational (28 days on - 28 days off) therefore holidays are part of the 28 days off and no 'mid-contract' breaks are expected.
DMR 265	Page 1011: Presumably it should be “9 seats / week on the air-bridge”, as 9 seats / flight would mean the weekly unallocated capacity was 112 seats rather than 103.	Thank you for your comment. This is noted and will be amended.

Reference	Request for information	Navitas response
DMR 266	Page 1012: Do the figures in table 11.29 account for holiday/school trips by staff based permanently in the Falklands (and their family members)?	The figures account for holidays but not for extended family members' school trips as Navitas do not yet know the make up for the full team and so focused purely on the position and not their potential extended family. It is anticipated that there will be spare capacity on charter flights which can be utilised by personnel engaged on the project and/or their dependents, or otherwise (with the agreement of FIG) on-sold to community members. Air passenger seat availability will also be covered in the Socio-Economic Impact Assessment.
DMR 267	Page 1018: Would Navitas consider committing to covering the cost of fully sealing the Coastel Road as part of its project preparation?	Navitas was a signatory to a joint industry letter to FIG (led by FIFCA) requesting that Coastel Road be sealed (sent on 22/01/24 to the Director of PWD by James Bates). At this time Navitas would not consider to committing to covering the cost of fully sealing the Coastel Road.
DMR 268	Page 1024: Would a degradation in air quality from diesel particulates not be a potential impact to the human population?	Air quality is listed as a receptor in Section 11.7.3 and an impact assessment section will be added.
DMR 269	Page 1043: Why has turning off yard lights when not required not a mitigation measure?	This is a valid point. It was not specifically mentioned because it is simply expected that lights will be switched off when all yard activity has finished at night. This will be standard practice. To be clear there will be a number of security lights but yes, the operational lights and office lights will all be switched off each evening once operations have ceased for the day. This is considered standard practice rather than a mitigation as such. However Navitas can add clarity to the post consultation EIS text to explain that it will be normal practice to switch off any lighting that is not required operationally.
DMR 270	Page 1057: There is not currently a heliport in or close to Stanley.	Navitas intends to develop a heliport at Stanley airport in conjunction with FIG and that this will be constructed in time to support Sea Lion Phase 1 and 2 operations. Stanley Airport has previously supported helicopter operations for the various exploration drilling campaigns. The text will be amended for clarity.
DMR 271	Page 1059: Was noise from lifting and loading on the TDF or in the yard considered for table 11.48? What would these noise levels be?	Lifting and loading noises were not specifically included but reversing alarms were as well as the noise of vessels, see Table 11.48. It is

Reference	Request for information	Navitas response
		anticipated the lifting and loading at the base will be less than that experienced during an offload of the Unispirit as the vessels and cranes will be smaller. Navitas will add a note to the post consultation EIS explaining that noise sources are a selection of the significant noise sources of different levels and characters to judge the likelihood of nuisance.
DMR 272	Page 1061: Was lifting and loading noise modelled? Only engine noise appears to have been considered despite lifting/loading noise being identified as an issue in table 11.49. What noise levels would be expected from lifting and loading?	Engine noise makes up the vast amount of noise generated during lifting and loading operations as the vessel engines will be on to enable safe manoeuvres, and the cranes will be operating using generators on the vessels. Navitas will add a note to the post consultation EIS to clarify that lifting and loading noise is included in the vessel noise estimate.
DMR 273	Page 1077: The Offshore Petroleum (Licensing) Regulations 2000 should also be listed.	Thank you for your comment. This is noted and the text will be amended.
DMR 274	Page 1084: When are tests on pelts and fur adhesion likely to take place?	This will be conducted prior to drilling commencing and in sufficient time to inform key operational documents including ERPs and OPEPs, subject to import permits (for France). Navitas will include indicative timing in EMMP Chapter 15.
DMR 275	Page 1084: Is sheen formation expected to be higher or lower at lower sea temperatures?	Sea Lion crude does not produce a visible sheen at 18 degrees. It will is therefore not expected to produce a sheen a lower water temperatures, please refer to Table 12.1 on sheen formation.
DMR 276	Page 1103: Is 21 days a worst-case scenario for stopping a well blow-out? Macondo took 86 days to stop the flow of oil and was located in an area that is not as hard to transport equipment to as the Falklands.	Navitas has assessed the availability of capping stack devices and the timing for their deployment to the Falkland Islands. 21 days is considered a credible worst case timeline for deployment. Capping stack availability has advanced since the Macondo spill in 2010 and capping stacks that can be transported by air have been developed.
DMR 277	Page 1137: Due to the low quality of the images, the legend of the scale bar is illegible in figures 12-33 and 12-34.	Navitas notes DMR's comments in relation to Figures and suggest this may be a compression issue. The original figures are all high resolution and will be checked throughout for this issue. Please note a hi-resolution copy of the EIS may be requested if required.
DMR 278	Page 1138: The 180 cubic metres being recovered seems unlikely to equate to up to 60% of the post-evaporation spillage given previously it is suggested (page 1121) that only around 7% of Sea Lion crude would evaporate at the surface.	This represents two very different scenarios and time lines. The transfer spill can be contained more rapidly. The 7% relates to the quantity modelled for an FPSO release.

Reference	Request for information	Navitas response
DMR 279	Page 1148: Rather than rely on bringing in a well capping device if there is a blow-out, can Navitas not keep one in the Falklands for the duration of the project in case one is required?	There are a limited number of specialised well capping devices and supporting equipment and resources available globally. They form part of a shared contingency plan across the wider Oil and Gas Industry. To locate one in the Falkland Islands long term would be difficult logistically and would hinder contingency plans for other operators.
DMR 280	Page 1157: In the first paragraph, the % of oil reaching the shoreline and mass of beached oil is stated to higher in the loss of FPSO crude inventory scenario compared to the well blowout scenario, but the text goes on to state “The potential deposition in sediments is also much smaller”. This is confusing.	This will be clarified in the text.
DMR 281	Page 1178: The FPSO exclusion zone is 1250m not 500m.	Thank you for your comment. As described in Section 5.5.4 the FPSO will have an exclusion zone of 1,275m. This will be checked and updated throughout the document to check for typos.
DMR 282	Page 1201: Re “a wide spectrum oil skimmers”, would there be one of these or several?	There will be several; 2 skimmers on each Offshore Support Vessel and 10 in the Stanley supply base. The typo will be addressed in the post-consultation EIS. See also DMR 55.
DMR 283	Pages 1207-1210, 1211: Given the large difference in spillage volumes between the two scenarios and the same level of likelihood (unlikely), it seems odd that the overall significance of the risk to various receptors is the same for both scenarios – one would expect that a spill 120 times larger (1200 tonnes vs 10 tonnes) would have a much higher overall risk significance, particularly on seabirds and marine mammals given large areas of the eastern end of Berkeley Sound that they are concentrated in would be covered by a sheen in the 1200 tonnes scenario.	This is due to the precautionary approach. It is expected that the likelihood of a vessel collision resulting in a release of 1,200 tonnes of MGO would be 'Very Unlikely' ('Impact almost never observed, few if any events in the industry, failure of nearly all operational controls would be required'). However, as there will be vessels in Berkeley Sound which are operated by third parties e.g. fishing vessels etc, adherence to operational control will be outwith Navitas sphere of influence. Therefore, the likelihood of occurrence was elevated to 'Likely' to take a precautionary approach.
DMR 284	Page 1211: How would “Enhanced crew bunkering competency” be attained?	This will be attained as follows: 1. Identified by Navitas' Offshore Bunkering Procedure and the Area Specific Operational Guidelines (ASOGs), 2. Achieved by a Hazard Identification and Risk Assessment (HIRA) once the marine contractor for the OSVs has been selected, and 3. Verified by Job Safety Assessments and Tool Box Talks prior to each operation. In addition, regular drills and Navitas' Audit and Assurance Procedure will

Reference	Request for information	Navitas response
		assure crews achieve and retain the required level of competency. Please note that Section 5.10 and Table 4.4 both refer to the use of dedicated tanker berthing crews to supplement the CTT crew thus ensuring the required standard of competency is met for every offtake operation. Explanation of measures to ensure bunkering crew competency will be adedd to the post consultation EIS.
DMR 285	Page 1214: The HMP is listed as a project-specific mitigation for the risk to Berkeley Sound, but wording elsewhere (page 108) suggest the HMP will only cover Stanley Harbour.	Text will be clarified in section 12.2.12 to indicate only Stanley Harbour is included in the HMP.
DMR 286	Page 1219: Would tourism not be a potential receptor given Stanley Harbour is one of the most visited locations in the Falklands?	Thank you for your comment. This is noted and will be added.
DMR 287	Page 1236: Table 13.1 does not seem to be consistent with the contents of table 9.1. For example, table 9.1 identifies Placement and presence of objects on the seabed as affecting benthos, the seabed/soil and human population. Table 13.1 identifies disturbance to seabed/placement of objects as affecting plankton, benthos, fish, sea bed and water quality, but not humans. Several of the same queries raised above re table 9.1 apply here (e.g. why are benthos not deemed to be impacted by underwater noise). Other queries include: • Are humans not impacted by artificial light and onshore disturbance from helicopters? • Are other users of the sea not potentially impacted by the placement of objects on the sea bed due to the potential for trawling nets to be caught? • How does unplanned venting of gas affect commercial fisheries?	These will be checked and cross-referenced and updated where necessary.
DMR 288	Page 1263: Combustion of sold product fits the requirements for needing an EMMP action (risk being upper moderate and confidence being uncertain) but is not included.	While the impact assessment rating for emissions from sold product thoeretically meets that criteria for inclusion in the EMMP, there is no policy guidance for this at this juncture, and it is difficult to conceive of a Monitoring and Management Action that would provide a consistent and auditable end use. All quantities of export volumes will be recorded. It is beyond the seller's

Reference	Request for information	Navitas response
		ability to influence the use of the product once it has been sold or monitor and manage emissions arising, thus the end user's emissions will be their responsibility to monitor, manage and report; their scope 1 & 2 and will be considered Navitas' scope 3. A conservative assumption of Navitas' Scope 3 sold product emissions (all being combusted) were included in the EIS. The confidence rating is uncertain as it is not possible to determine what the end uses of the product will be, and consequently a worst case has been applied to the assessment.
DMR 289	Page 1288: Combustion of sold product is missing from the list of significant residual impacts.	Thank you for your comment. This is noted and the text will be amended.
DMR 290	Page 1300: Should the definition of Endemic be "Native to or confined to a particular region"?	Typo, this will be corrected.
DMR 291	Page 1365: The IUCN statuses should be updated to 2024.	Will check and amend where necessary to 2024 listing.
OPRED 1	For the UKCS we would anticipate a commitment to using chemicals in line with the Offshore Chemical Notification Scheme (OCNS) but it is understood that the chemical requirements for FIG may differ. The section states chemicals will be chosen to minimise environmental impact however there is no committal within section 5.9.1 of these being OCNS ranked products. Although this is stated in section 10.6.1.1.2 it would be beneficial to be clear at the front end of the documentation for all chemical usage.	Thank you for your comment. This is noted and will be amended.
OPRED 2	The onshore construction is stated within the EIS to have an anticipated start date of Q3 2024. To note, this is likely out of date due to being in Q3 and the project being examined at this point	At the time of writing the EIS it was anticipated that replacement of the TDF causeway would commence in Q4 2024. The regulatory approval timeframe has extended so that such onshore construction works are not anticipated to commence until 1H 2025. Navitas will update the target date for commencement of the TDF causeway replacement in the post consultation EIS.
OPRED 3	The UKCS has a clear seabed principle with respect to end of field life. The aim should be not to leave subsea equipment in situ. . Decommissioning in design is also a requirement of International Maritime Organisation (IMO) regulations. Whilst the decommissioning aspect of the field will be subject to a further impact assessment at the time it should be clear that the field development meets the criteria of decommissioning in design and clear seabed principles.	As stated in the EIS, 'Decommissioning will be carried out in accordance with the legislation in place at the time'. At the time of writing, the project defers to the current UK legislation and its sources. OSPAR Decision 98/3 on the Disposal of Disused Offshore Installations prohibits dumping, and leaving wholly or partly in place, of disused offshore installations within the OSPAR maritime area. While derogation from this prohibition may be sought for qualifying installations, e.g. large

Reference	Request for information	Navitas response
		steel or concrete footings of fixed platforms, this will not apply to the proposed project which will utilise an FPSO with subsea wellheads and infrastructure. Under OSPAR, all subsea structures must be removed with any associated piles, well conductors etc. cut to a level below the natural seabed which ensures they remain below the seabed in the face of prevailing conditions. Of importance, pipelines and other structures which are listed in a UK Pipeline Works Authorisation are excluded from OSPAR Decision 98/3 and in the UK, decommissioning of these is managed in line with the Petroleum Act 1998 (Part IV) and the Pipeline Safety Regulations 1996. These require a similar assumption of complete removal where reuse of the pipeline and associated structures for further hydrocarbon development is not possible. However, under the UK regulations, there are certain pipelines and/or circumstances in which a pipeline may be wholly or partially left in situ e.g. pipelines that are adequately buried or trenched and are not subject to development of spans, and are expected to remain so. However, the decision to do so would need to be informed by an EIS which is supported by a formal Comparative Assessment of the options which must include a robust assessment of the environmental impact of removal vs. that of leaving wholly or partially in situ. Part V of the Offshore Minerals Ordinance 1994 confers obligations for decommissioning. A decommissioning programme has to be approved by FIG in advance. FIG has powers under the Ordinance to develop additional regulations in relation to field decommissioning. As stated in Section 5.12 of the EIS: '…in line with the current legislation, the Phase 1 & 2 Development infrastructure has been designed to enable complete removal of all structures. Equally, the flowlines will be surface laid and will not be trenched or buried thus facilitating complete removal (noting that the seabed is very soft, so flowlines may self-bury which could change the methods required for complete removal).' Also in line with legislation, all relevant 'As Left' surveys will be carried out to ensure that the seabed is left clear. The Sea Lion Phase 1 and 2 offshore installation and subsea infrastructure has been designed so that it can be removed completely and the seabed

Reference	Request for information	Navitas response
		left clear. Therefore the project has been designed with compliance to current regulation in mind and Navitas will comply with the prevailing legislation at the time of decommissioning.
OPRED 4	The production profile of the P50 case in the EIS does not appear to align with the production profile in the field development plan (FDP) with differing P50's provided with the exception of table 14 within the FDP. This makes it difficult to read across from the FDP to the EIS to be able to confirm/interpret (section 4.2.2 of FDP). In addition, this section fails to demonstrate the profile over the field life. e. OPRED would expect tables to describe expected production for that year in both the FDP and the EIS in the same units to fully confirm that this aligns and has been assessed properly. Table 10.63 also appears to have a typographical error as power generation is presented as P50 306.9 Mstb whilst combustion of sold product contained within the same table is presented as 306.9 MMstb. There is also an error in the text which states "Table x presents the production profile of oil".	Both P50 production profiles within the EIS and FDP deliver 306.9 MMBO over a 30 year production life. All volumetric references in the EIS are rounded to 1 decimal place (306.9 MMBO), whilst the FDP doesn't round to decimal places (307 MMBO). Production tables were provided to FIG using the Standard Economic Template (SET). Section 5.8.2.1.1 and Table 10.63 will be checked to ensure consistency in metrics used. Figure 5-8 will be updated to include the production profiles of P10, P50 and P90. For clarity, Navitas shall update the post public consultation EIS to include year by year profiles for all produced phases in tabular form.
OPRED 5	There is a typographical error - "medium sized" - should this be "medium sized"?	Thank you for your comment. This is noted and will be amended.
OPRED 6	A date has been stated for construction which is in the past. However, the current schedule expects that, during Stage 1, a maximum of two LTVs will be present in Berkeley Sound for only eight months (c. August-2022 to end March-2023). The EIS should be based on future works and as stage 1 construction has not yet started this date is incorrect.	Thank you for your comment. This is noted and will be amended.
OPRED 7	The section states "Monitoring of light-related impacts forms part of the EMMP (Chapter X) and further mitigation will be discussed should adverse impacts be identified." However, the section is project specific mitigations, and the subsequent table of impacts (table 10.8) shows the impact of bird strike for offshore and inshore lighting to be moderate. The statement within the EIS and conclusions drawn in the table are contradictory.	Navitas do not consider monitoring to be synonymous with mitigation. The initial impact assessment re bird-strikes is listed as Moderate. Because this is significant, project-specific mitigations are then considered. While numerous mitigation measures exist, at this time and stage in the project Navitas identify only two measures ('Reduce light pollution by auditing and, Dousing of unrequired lights') as reasonable. While these will be deployed, they are not considered to be sufficient to reduce the impact in the residual assessment and it is recognised that further mitigation will be required.

Reference	Request for information	Navitas response
		The main mitigation measure is to follow the guidelines of the OSPAR Agreement 2015-08, the purpose of which is to minimise pollution of the northeast Atlantic and North Sea including light pollution. However, this in turn requires a series of options to be investigated and balanced with safety and operational imperatives. The practicalities of adopting the OSPAR green lighting strategy will be investigated during the project engineering phases as a potential further mitigation against bird-strikes but, until this is done, green lighting is not included as a means to reduce the residual impact/risk and is not factored into the assessment. In short, until the feasibility of further options has been explored in FEED, the residual impacts remains Moderate. Navitas will review the narrative in the post-consultation EIS to clarify that further mitigation measures will be explored in the FEED process and that the monitoring will serve to ground-truth the impact assessment and adjust the use of mitigation measures as necessary.
OPRED 8	It is unclear why it is only wellbore clean up and completion fluids which are planned to be selected in line with OCNS. It would be expected that all the chemicals in the table should be. Please confirm - described later in section however should be clear throughout.	Thank you for your comment. This is noted and will be amended.
OPRED 9	The use of Risk Based Approach (RBA) for Produced water (PW) is stated as a mitigation/control measure. OPRED question if this is feasible given the distance away from laboratory facilities capable of undertaking this and the degradation time of the sample.	There will be a de-gasser and OiW monitor automatic instrumentation and ongoing laboratory analysis twice a shift by a lab tech on board the FPSO, with appropriate laboratory analysis equipment. Navitas is committed to having appropriate laboratory facilities and equipment available, and to independent verification. Laboratory facilities will be developed onshore as necessary.
OPRED 10	There is insufficient detail provided within this section. The single statement does not include any trends. OPRED would consider that figures are not stable and would incur fluctuations. For example, it is unlikely to remain stable over the field life. A graph reflecting the trends over time would be much more meaningful as a baseline.	Navitas recognise that the use of a single number to indicate global energy demand is less than ideal. However reliable data on trends in global demand/supply are difficult to establish as most information has a bias toward the continued sanction of O&G projects, or the cessation of all development. Therefore it was difficult to identify a measured and

Reference	Request for information	Navitas response
		unbiased baseline trend. In the absence of trustworthy, unbiased and respectable sources for such a data set, Navitas opted to use the data provided by the IEA (2023). While a forecast is provided in this report, it extends only from 2017 to 2030 and therefore didn't seem fit for purpose. While a range from various sources could be added to provide a context, the chapter is already a complicated one and Navitas opted to avoid adding numerous extra figures. To overcome this concern re bias, in the post consultation EIS Navitas will reference the 'Resources for the Future' which synthesises 15 different projections of oil demand including the BP Energy Outlook; https://media.rff.org/documents/Report_23-02_NPKKYws.pdf
OPRED 11	Inclusion over how long phase 1 and phase 2 will be in comparison to the field life duration would provide context to the figures presented. An assessment of trends cannot be made with the information presented.	Total project time = 32.6 years Stage 1- 2.6 years = 8% of total project time Stage 2 - 2.9 years =9% of total project time Stage 3 - 27.1 years = 83% of total project time These figures will be added to the relevant table headers throughout the chapter.
OPRED 12	Within the base case the flare pilot light assumes 0.5mmscfd. The worst case is 0.7mmscfd. A justification as to why this has increased would be beneficial It is usual that the worst-case operations in terms of impacts would be those experienced within P10 operations as with increased production.	The fuel gas used for the pilot light is realistically expected to be 0.5mmscfd but for the worst-case assessment was elevated to 0.7 mmscfd. Consideration of the P10 - P90 cases was not a part of this decision as the pilot light fuel usage will remain consistent regardless of production rates. Navitas notes the comments and will reduce this to 0.5mmscfd in the worst-case assumptions in the post consultation EIS and reference the guidance which states that uncertainty is accommodated in this figure.
OPRED 13	Sections 10.9.4.4.5.1 and 10.9.4.4.5.2 discusses the emergency/unplanned events, and the a VRP malfunction. The associated figures in Table 10.69 should be included in the worst-case figure. These two scenarios include elevated emissions but have not been included in either the baseline or worst-case scenarios. Table 10.63 - It is unclear why the P50 has been used for the emissions profile. In addition, the average over the field life produces a flat	Emissions from process shutdowns and emergency blowdowns are already factored into the emissions estimate. The narrative on flaring provided in Table 10.63 will be updated to state 'process upsets and emergency blowdowns'. Further, for Table 10.66, footnote 4, will be updated to ensure transparency. Therefore the estimates in Table 10.66 do indicate the worst-case emissions of all activities. However it is recognised that this is not reflected in the section heading or narrative which indicates 'planned' activities, which will be updated.

Reference	Request for information	Navitas response
	emissions level however this is not the case for operations. Assessing this way reduces the emissions profile over the field life. It also presumes a constant rate of emissions for the life of the field and therefore in early years/higher production years the emissions will exceed what has been assessed in the EIS. This needs re-examining with the inclusion of the production profile anticipated per year and emissions per year of the project presented. Furthermore, it is unclear if the offload vessels energy requirements/heated tanker aspect has been factored in as part of the emissions profile. It is therefore difficult to ascertain if this is correct or not as the information has not been presented.	Of note: - The background calculations were shown and explained to FIG on the 19th August 2024. - Section 10.9.4.4.5 itemises the potential for unplanned emissions that would result from an emergency blowdown / VRP failure. They are unlikely to happen but as stated above, these are captured in the production emissions of Table 10.66. This will be made clearer in the text. - The CO2e number and totals in Table 10.69 have errors resulting from a copy and paste of tracked changes. These will be corrected and the emissions resulting from a single blowdown are 694 tonnes CO2e. - The cargo tank sizes on the likely FPSO have now been confirmed and the tonnage of HC gas that would be vented in the worst-case event of VRP failure is now 38.84. - Table 10.69 will be updated to reflect this. - The cold gas venting EF will be checked in Table 10.65 Table 10.63. The worst-case production rate commensurate with P10 will be listed in the worst-case column in the table. However, as the emissions estimated are not based on the production rate, this will not effect the actual emissions which already encompass the potential for the higher production rate. The P50 production profile, showing the decline in production over time is already presented in Section 5.8.2.2.1 (Development Description) and the P10 - P90 profiles are shown in Section 10.9.4.5.4 on carbon intensity. However, for the sake of context, a figure showing the three production profiles will be added to Section 10.9.4.4.1 and referenced to in Table 10.63 to show the context. Further, the emissions as they occur over the project-lifespan will be presented in Section 10.9.4.4.4 alongside the tabulated estimation figures. Emissions associated with the offload vessels were confirmed by FIG as being outside the boundary of the EIS scope (ref email from DNR 17/05/24).
OPRED 14	The unit MtCO2e is used until this is converted to intensity kgCO2e/boe. The text then uses MtCO2e to include the four well flow back	The sentence order will be changed to indicate that the carbon intensity data include the four well tests and the wording will be changed in Section

Reference	Request for information	Navitas response
	contingency upping the worst-case baseline to 8.99 MtCO2e. This appears to be out of order. Why is this not included in the worst case prior to converting to intensity? This would allow for a complete comparison with the base case intensity. For transparency, a reference to the conversion methodology to generate the intensity should be included.	10.9.4.5.4 to indicate that this is not the worst-case baseline intensity but is in fact the worst-case baseline plus contingency intensity.
OPRED 15	References numbered 5, 6 and 7 are within the body of the text in sections 10.9.4.4.7 and 10.9.4.4.8 but no full references are included in footnotes as per the rest of the document.	These will be included, also note that the background calculations were shown and explained to FIG on the 19th August 2024.
OPRED 16	It is unclear why the P50 carbon intensity is discussed in this section. The section needs to be expanded to be transparent. The section states that the P90 case is the worst for carbon intensity, and this is presented in figure 10.39. This is greater than the carbon intensity for the P50 case as shown in figure 10.40. However, the section assesses the P50 and not the P90 case making it unclear.	The range of carbon intensity is provided in the section already. Therefore, Navitas understand this comment is in relation to the last paragraph in the section which refers to P50 only. The paragraph will be updated to include the range of intensities and to indicate that even the lower production case (P90) carbon intensity, including all vessel and drilling emissions etc, is lower than the NSTA benchmark of 39 kgCO2/boe.
OPRED 17	There is insufficient information on the calculation method included. The units should be comparable to ensure that the calculation as well as the assessment is transparent. It is not currently possible to easily emulate your conclusions given that the sold product emissions is given for all products over the entire field life of 30 years compared to a daily global figure. The assessment does not include a realistic like for like comparison which can be assessed for the significance impact.	Thank you for the comment. The text is comparing tCO2e from Sea Lion to total global production in barrels. Navitas will expand on the calculation method and do a similar calculation based on the global production figure using the same emissions factor so the units match. A table will be added to fully show all the emissions cases.
OPRED 18	The text states that the average production per year would be 27,800bopd. Does this mean that there will be 27,800 barrels of oil produced every day of that year given bopd means barrels of oil per day? In addition, the jumping between the units MMstb to bopd makes it difficult to follow the trends and is not very transparent when trying to demonstrate the base case for comparison and therefore assessment of this aspect	Yes. The P50 case averaged over the field life is 28,700 bopd. A figure showing the production profile over the field life will be added to Section 10.9.4.4.1 and the conversion of boe to MMstb will be added in brackets alongside the bopd figure. See also response to OPRED 13.
OPRED 19	It is stated that Sea Lion will not be able to facilitate a zero-flaring approach. Therefore the associated GHG intensity of emissions from operational flaring should be included. There is an inability to meet BAT in line with projected future UK emissions. All routine operational flaring is prohibited for new developments in the UKCS.	Navitas are committed to a zero routine flaring approach and the narrative will be re-worded accordingly. The only baseline flaring that will occur is that associated with commissioning of the GI system and that occurring for safety reasons during unplanned process upsets/emergency blowdowns. The contingency is retained for four well tests should they be deemed necessary. All of the above have been accounted for in the

Reference	Request for information	Navitas response
		emissions estimate. Zero flaring will occur during routine operations.
OPRED 20	The section states that in "absolute terms the maximum (P10) estimate of emissions from combusted product is a significant contribution." However, this is not what has been assessed or presented so it is unclear given the P50 case has been used.	The P10 case is assumed to ensure a worst-case estimate for assessing the impact of sold product, as is indicated in Section 10.9.6.1.3. The worst-case assumptions listed in Table 10.63 for the production level will be changed to reflect the P10 case. However, the production level is not indicated in the climate change assessment (Section 10.9.6.6.1) so it is not clear what exactly the comment is referring to. Of note the assumptions listed in Table 10.63 are considered sufficient to encompass emissions associated with the P10 case so changing the production level does not directly affect the emissions estimate. Navitas will update this EIS section to ensure language is clear.
OPRED 21	It is stated that the worst-case assumption of 100% combustion has been presumed. However, this uses the P50 and the P10 case, which is not what is presented and does not align with the statement made in Section 10.9.6.1.3. Please clarify	Navitas is a little confused by the comment as this section does not specify P50 or P10 and just makes reference to Section 10.9.4.4.8 which provides the full range from P10 - P90. Table 10.72 shows the estimated total atmospheric emissions resulting from O&G operations in the NFB during Field Life and intentionally does not include the emissions that will results from the product once sold. Relevant sections of the post consultation EIS will be reviewed to ensure that the language is clear.
OPRED 22	The paragraph states that all monitoring requirements will be managed via the EMMP. However, table 15.2 does not include emissions (and therefore presumably the EMMP plan) and thus is in contradiction to the statement within the paragraph.	Thank you for your comment. This is noted and the text will be amended accordingly.
OPRED 23	Section 10.9 (emissions) concludes that impacts remain as moderate and upper moderate for the sold product. However, emissions are not included in the EMMP. Using the criteria (table 15.1) it is not clear why emissions have not been screened in given the impact is certain for project emissions and uncertain for global sold product	See response to DMR 288.
OPRED 24	This does not include an end product emissions rating which was upper moderate - this seems to be an omission in this section.	Thank you for your comment. This is noted and will be included.

Reference	Request for information	Navitas response
OPRED 25	There are multiple responses where the chapter/section has not been cross referenced and XX stated.	This is done to show that the requirement is addressed in multiple chapters, and in the same section within each chapter. For example, acknowledged uncertainties and data gaps are noted in section 10 of each assessment chapter, which is expressed as X.X.10. In chapter 10.1 (artificial light), the uncertainties are noted in section 10.1.10 and so on.
SAMS 1	In the case of Designated Sites, the linkage between Designated Site status and the health of qualifying constituent features has been overlooked (i.e. the reasons as to why sites have received Designated status). Whilst impacts on qualifying features such as birds are relatively robust, there has been a failure to carry through the consequences and relate potential decline in species populations to associated Designated Site status.	Thank you for the comment. Navitas will review and update.
SAMS 2	Regional Air Quality is clearly indicated as a receptor during the ENVironmental Impact IDentification (ENVIID) workshops, with Table 9.1 in Chapter 9 clearly stating that Regional Air Quality had been scoped in, with 'further assessment required 'in Chapter 10.9. The subsequent assessments make no recognition of potential impacts at a regional level, with page 795 stating that… "As described in Chapter 9, impacts to air quality have been screened out owing to distance of the offshore location from environmental and social receptors." There is a clear disparity here between what has been highlighted as a result of the ENVIID workshops for consideration within the EIS, and what has received attention. Whilst some of the emissions data presented do have relevance at a regional scale, they are only assessed on a global level. It is likely that an explicit definition of what is regarded as a 'regional' versus 'global' level is required, and data re-examined under this consideration	The previous EIS submitted by POEPL had a full chapter discussing the potential for impacts from inshore and onshore emissions to air quality, the primary source of which was incineration of waste at the supply base. In the absence of AQO's for the Falkland Islands, those from rural Britain were used as a conservative proxy. Even with a precautionary approach, all the impacts to the receptors (namely the human population and vegetation) were identified as Very Low. In the proposed Navitas Phase 1 & 2 development, an incinerator at the supply base is no longer a base case requirement, in discussion with FIG, it is considered that the municipal incinerator will have capacity to a accommodate the project incinerable wastes. Therefore, when reviewing the potential impacts and risks during the Navitas ENVIID, emissions from a standalone incinerator were scoped out to prevent double counting with FIG emission impacts. Even should a temporary incinerator be required at the supply base in the event that the FIG facility is not yet available, this would be very short-term. Therefore the only source of emissions that could impact regional air quality are those that result from two LTV vessels at anchor in Berkeley Sound for a cumulative duration of 13 month with periodic visits to these LTVs from installation vessels. The impact of emissions from these are considered to be negligible and so following the ENVIID process described in Chapter 9, further assessment of these was scoped out. This is

Reference	Request for information	Navitas response
		indicated in Tables 9.2 and 9.3. However, it is noted that all the line entries in Tables 9.1 to 9.3 that refer to combustion activities include an 'F' under regional air quality indicating that the impact to air quality from offshore activities would be impact assessed. However, in the absence of any key receptors to changes in air quality offshore, this impact is scoped out and the ENVIID tables should state 'S' indicating that this has been scoped out. This change has been made within the post consultation EIS and Chapter 10.9 continues to consider the global impacts of project associated emissions. Navitas has considered reinstating the inshore/onshore air quality chapter, however with minimal and very short-term sources of impact, the impacts are considered to be so low as to warrant remaining scoped out. The relevant tables have been updated in the post consultation EIS. A definition of 'regional' will also be included.
SAMS 3	Within Chapter 9 describing the ENVironmental Impact IDentification (ENVIID) workshops and identification of areas to be covered within the EIS, the terminology 'Screened out' is used when referring to whether impacts and risks should be excluded from the EIS. It is recommended that it may be better to adopt the terminology 'scoped out' instead	Thank you for your comment. This is noted and will be amended.
SAMS 4	Whilst it is acknowledged that meaningful assessment of cumulative impacts is very hard to make, it is felt that more could have been done with this chapter considering the work undertaken in the EIS chapters. For example, colour coding the assessed residual risk for each receptor under each activity would give the reader an idea of cumulative risk.	Thank you for your comment. This is noted and a colour-coded assessment of cumulative impacts will be added to provide a better picture of cumulative impacts, although it is acknowledged this will be qualitative and likely very precautionary.
SAMS 5	Regional air quality: The assessment of impacts on 'regional air quality' from development activities are not fully explored in the EIS. More clarity is needed on what is considered to be 'regional', and a re-focus on how to assess activities and any associated impacts that may arise at that scale. Section 10.9 Atmospheric Emissions fails to explicitly mention regional impacts, despite being highlighted in Table 9.1 as the section in which impacts on this receptor will be assessed.	See comment SAMS 2 above.
SAMS 6	Seabirds: However, the overall synthesis of seabird distribution information needs improving as it is difficult to relate the levels of risk that are assigned throughout the assessment tables with the information	Thank you for the comments - Navitas will review and improve.

Reference	Request for information	Navitas response
	presented in the descriptive ecology chapters given the data gaps that are present, and the different methodologies involved in the studies that are described.	
SAMS 7	Social: However, the depth of understanding of the data in relation to social impacts of the environmental effects is not equal to that of environmental impacts and the opportunity for significant analysis of data emerging from stakeholder consultations may have been overlooked.	A separate Socio-economic Impact Assessment is underway which will detail these more thoroughly.
SAMS 8	The major point of concern is the assumptions of offshore habitat conformity, and appropriately evidencing this assumption within the EIS itself. The reviewer feels that there could be more detail within the EIS on offshore benthic communities from different sampling stations, considering the repeated assumption of offshore habitat homogeneity. Whilst this maybe a fair conclusion from associated reports, this evidence is not clearly displayed within the EIS.	Navitas will add more detail here. Thank you for the comment.
SAMS 9	However, the EMMP outlines the use of Remotely Operated Vehicle (ROV) surveys to visually identify habitats of conversation importance at the well locations (Section 15.6.2.1.5). Whilst this a standard method for marine surveys, it should be noted that this is limited to the observation of epifaunal taxa/communities and will not provide any data on the infaunal community of the benthic sediments.	Ninety stations were sampled using grabs, with drop-down cameras, in a previous survey (2012) carried out in the Sea Lion field. Analysis of these indicated a relatively homogenous infaunal environment such that visual ROV surveys of the well locations are considered sufficient to identify and habitats of conversation importance. Seabed grabs for sediment characterisation, benthos, chemistry and heavy metal analysis will take place post first drilling. Navitas will update the EMMP chapter in the post consultation EIS in this regard.
SAMS 10	The calculation of the ‘Permanent footprints’ within Table 10.14 is not clear, although alteration of the figures is unlikely to change the resulting impact assessments.	The Table describes the impact of the moorings and anchors for the MODU and the FPSO. The MODU is temporary and so have no 'permanent' (until decommissioning) footprint. The FPSO temporary footprint includes a wider area of disturbance that will result from laying of the anchors initially ((length 780 m on the seabed * 10 m disturbance corridor around the chain)*12). This is to account for physical impact of laying. The permanent footprint describes that resulting from the chain once settled on the seabed. Navitas will review the chapter and make changes to the text and tables where necessary in the post consultation EIS.

Reference	Request for information	Navitas response
SAMS 11	No summaries are presented within the EIS to explicitly show that offshore environmental samples are indeed comparable (e.g. a table detailing univariate metrics such species numbers, total individuals, species diversity indices, dominant taxa identified etc.; alternatively figures showing similarity or cluster plots).	Thank you for this comment. Navitas has the supporting material and the documents can be supplied on request. Navitas made a conscious decision not to include this in the text as it would add to what is already considered a very large document.
SAMS 12	The offshore data is undoubtedly found within the supporting reports, but it feels like an omission not to include more evidence within the main body of this EIS, considering the assumptions made on habitat homogeneity.	Please see SAMS 11.
SAMS 13	There was little mention, however, of contingency planning for if a marine Non-Native Species was introduced by the operations detailed and a biosecurity management plan (BMP) for marine Non-Native Species should be developed. Whilst a BMP for marine species is indicated in the Non-Technical Summary on page 108, it is only mentioned in relation to terrestrial species in Table 1.9, and a marine BMP it is not mentioned explicitly within Chapter 10.12 as a tool to reduce impacts or mitigate risks in the body of the text.	The Biosecurity Management Plan will cover both terrestrial and marine invasive species, this will be clarified in the relevant sections.
SAMS 14	The design of monitoring methods, however, should focus on increasing detection probability. Therefore, it is recommended that scrapes of biofouling present on artificial structures closely associated with the operations (e.g., Inshore Mooring Buoy) be included in the monitoring activities. Likewise, a combination of panels deployed for short periods (6-12 weeks) and longer periods (annual inspection) will ensure that late succession species are included in the overall species list whilst ensuring sufficient frequency of monitoring.	The proposed monitoring for marine invasives in described in Section 10.12.10.1 which includes: • The deployment of settlement plates in Stanley Harbour, Berkeley Sound and other appropriate locations, • The use of metagenomic technology to detect genetic material from non-native species in the environment (water samples), and • In the event that marine invasives are found, pathway analyses will be conducted to determine where / how invasives are being brought into the Islands. The EMMP Sections 15.6.2.1.4 and 15.7.2.2 describe the planned work. Of note, the proposed project does not require an inshore transfer mooring buoy and all reference to this has been removed from the EIS.
SAMS 15	Table 9.1 detailed that 'the introduction of marine invasive species to the offshore environment is not considered to be a concern over and above the introduction to inshore waters' and was thus screened out of the EIS. In the reviewer's opinion, this should have been screened in due to the	Thank you for the comment. The reason this was screened out is that the environment around the Sea Lion field is highly dynamic and the likelihood of transfer/settlement is extremely low. The open ocean is not a suitable environment for the transfer and establishment of fouling species

Reference	Request for information	Navitas response
	potential transfer of marine invasive species between the FPSO and Berkeley Sound by vessels, particularly in the installation phase.	and the risk is further reduced by the duration the vessels are in proximity. The Conventional Trading Tankers will be at a distance of c200m on a hawser so transfer between these vessels and the FPSO is not possible. Furthermore, all the vessels within Navitas' control will have clean hulls and anti-fouling paint. As a consequence of all these factors, the likelihood of transfer was considered low. The likelihood of establishment depends on suitable habitat and invasive species being in a reproductive state at the site.
SAMS 16	The pathways for Marine Invasive Species introduction are under-represented in some of the summary tables examining pathways of impact from activities on the environment. For example, Figure 1-3 should include a tick under Marine Invasive Species Introduction next to (i) drilling operations and (ii) sub-sea works since specialised vessels required for this work could introduce marine invasive species to the area via hull fouling. In addition, add a tick for Marine Invasive Species under 'Human Population' since certain invasive species have been known to have an impact on human health and/or the economy where they have been introduced. Similarly, Table 2.2 should include a tick in the 'Drilling operations', 'Installation' and 'Offloading from FPSO to CTT' boxes for marine invasive species. In Table 1.7 the 'Risk of introducing marine invasive species' is only highlighted under the 'Biosecurity' label; however, there is also the possibility of a 'moderate' impact from introduced species on the 'benthos/habitats' category.	Navitas has committed to making sure all vessels undergo hull inspections and where necessary cleaning before they arrive. Navitas will amend the tables as appropriate. Thank you for the comment.
SAMS 17	Data predicting the probability of Non-Native Species introduction, establishment and spread is sparse, although a horizon scanning exercise was completed in 2019 and published in 2022 (Dawson et al., 2022), which would be a good resource for this report. The data presented, however, was of good quality, although in certain sections the references were over a decade old and should be updated.	The references will be reviewed and Dawson 2022 will be included.
SAMS 18	There is a section on 'Coastal Sensitivity to Oil Spills' (Section 7.6, pg. 475), examining types of habitats and associated sensitivity to oil spills. A similar exercise can be undertaken looking at the risk of introducing marine invasive Non-Native Species - see Dawson et al. (2022).	Thank you for the comment Navitas will examine this to see whether it is appropriate.

Reference	Request for information	Navitas response
SAMS 19	Whilst a variety of survey methodologies have been employed in the shallow marine environment, there is no mention of any settlement panel work or ROV surveys of any artificial structures in and around Berkeley Sound (although it was noted though that settlement panel work has been done over three years in Stanley Harbour at the Temporary Docking Facility; pg. 325). 'Sheltered artificial structures' were named as a habitat type in Neeley et al. (2010), but very little information has been given in the EIS, especially considering their importance for initial colonisation by Non-Native Species. For marine invasive Non-Native Species, these structures be the first place to monitor within the Sound.	Monitoring is planned, see Section 10.12.10.1 but, of note, there will be no permanent structures in Berkeley Sound associated with the development.
SAMS 20	It was noted that plankton surveys have not carried out by Navitas for this report, and that the literature reviewed is mostly over a decade old.	Yes this is correct. There is some recent work that has just been published. Navitas will update the text with this. There is also some one going work by a PhD student but the work is not at a stage in which it can be cited.
SAMS 21	Key assumptions made regarding the risk posed by different vessels are appropriate, although the origin of the vessels that will potentially be visiting the Sound was vague.	The origin of the vessels that will visit Berkeley Sound is still to be confirmed. These vessels are subject to a future competitive tender. Educated assumptions (based on where the majority of Owners and similar activity areas are) have been made as to their expected origin at this stage. All vessels will be subject to stringent vetting process.
SAMS 22	It is stated in Section 3.2.18.1, pg. 108 that "Biosecurity Management Plan: Provides a framework for the processes intended to reduce the likelihood of introducing terrestrial or marine non-native species, which may then become invasive to the ecosystem of the Falkland Islands". This statement does include terrestrial and marine Non-Native Species in the BMP, but throughout the remainder of the EIS document the BMP is just related to terrestrial Non-Native Species (e.g. Section 1.7.4.2.8, pg. 55). Clarity is required whether the BMP relates to both terrestrial AND marine and if it is just for the former, then a marine BMP should also be included.	The Biosecurity Management Plan will cover both terrestrial and marine invasive species, this will be clarified in the relevant sections.
SAMS 23	Furthermore, under 'Potential Management Options' from marine invasive species in Section 15.6.2.1.4 there are no mentions of any control/eradication measures, with text focusing on prevention of another introduction event. This weakness is also replicated in Section 15.7.2.2 Marine Invasives, with no mention of potential management options. Table 1.9, pg. 68 states that "Settlement plates and pathways analysis	Thank you for your comment. As part of the 'Proposed Survey Activities' listed in Section 15.6.2 in the summary EMMP chapter, Section 15.6.2.1.4 states the following Management Objective: 'Confirm that presence of non-native species is not increased beyond levels of background change.' The associated action is to place settlement plates in the vicinity of the LTVs in Berkeley Sound,

Reference	Request for information	Navitas response
	[will be conducted] in the event of any incursions" – Settlement plates and pathway analysis should be implemented as part of the routine marine Non-Native invasive species monitoring programme, not just in the event of any incursions/introductions.	and on the TDF, prior to activity commencing with a view to providing early detection of the settling of any non-native species that may result from ballast water exchange or bio-fouling. In the event that a new marine invasive species is discovered, a pathway analysis will be conducted to attempt to determine where / how the species had been brought into the Islands, at which time and Navitas will review all Potential Management Actions. Of note, the table in Section 15.6.2.1.4 lists the relevant 'Adaptive Management Thresholds' and the Potential Management Actions'. Under the 'Post-Sanction and Pre-First-Oil' section of the proposed 'Research and Studies' (Section 15.7), Section 15.7.2.2 includes the following Scope of Work: 'In the event marine invasives are discovered in the course of normal monitoring, pathways analysis will be conducted to determine where / how invasives are being brought into the Islands'. These ensure that monitoring will be conducted pre-First-Oil and throughout the life of the development (Table 15.7) to ensure the early detection of any non-native species. If detected and identified through genetic analysis, subsequent pathway analysis will provide likely origin. The origin and history of Navitas chartered vessels will be known. However, it is correct that no eradication measures would be undertaken by Navitas as these are notoriously difficult and ineffective for marine spp. The focus with regard to managing the risk of invasive species is indeed on prevention of occurrence. Such measures include, for example, the application of D3 ballast water management plans with a D2 level of ballast water treatment for all vessels (Section 10.12.7.1) and hull inspections of LTV's prior to entry into Berkeley Sound. That said, if obvious invasive non native species were detected then Navitas would commission cleaning/removal should it be safe to do so. A Biosecurity Plan will be prepared prior to the commencement of

Reference	Request for information	Navitas response
		operations. All invasive species management protocols will be reviewed and any introduction detected will be communicated to FIG.
SAMS 24	Related to the above, there is no consideration of total Non-Native Species 'waste' to be disposed of at landfill (i.e. within Table 5.30) if they are detected on the FPSO platform and have to be removed.	The FPSO will be dry-docked for its refit and anti-fouling paint will be applied to the hull prior to its departure for the Falkland Islands to prevent fouling of the steel by marine growth. Management of waste arising from any invasive species detected will be described within the Biosecurity Management Plan but ultimately, all disposal methods would be agreed with FIG in the event they were needed.
SAMS 25	Direct off-setting (Table 8.9) was not considered possible, but the reviewer would suggest that other indirect off-setting (control/eradication of a potentially high risk invasive marine Non-Native Species) is costed and included in the Internal Carbon and Biodiversity Offsetting Fund (Section 8.11.3).	Navitas notes this comment. Indirect offsetting via the control or eradication of marine or terrestrial invasives may be candidate projects that are considered under the offsetting fund in due course. Public Consultation EIS Section 8.11.2.2 'Indirect Offsetting' says 'Navitas is also committed to exploring indirect offsetting opportunities locally. These may include habitat restoration projects, pest and invasive species eradication/control and conservation, biodiversity educational initiatives and the research required to inform them.'
SAMS 26	Within the impact assessment chapters, the linkages between Designated Sites and the potential impacts on their constituent features are not fully drawn out... To avoid such amplification of risk, it is perhaps something that could be addressed more thoroughly within Chapter 13 of the EIS. For example, a table detailing species a, b, & c have been identified as potentially at risk from the development, which in turn will impact on the status of Designated Areas x, y, & z.	Thank you for your comment. This is noted and Section 13 has been revised to colour-code each receptor and assessment to give an overview of the impact interactions. Navitas has also added where a designated site or species may be affected.
SAMS 27	Table 9.1 shows that Designated Sites have not been considered as receptors when constituent features (e.g. seabirds) are assessed as being potentially impacted. If population level impacts occur to bird species for which protected areas are designated, the integrity of the Designated Site will also be under threat. Designated Sites have only been identified as a receptor for seabed disturbance in Berkeley Sound, waster generation, introduction of terrestrial invasive species, and under Oil Spill scenarios. This omission is best demonstrated with an example. In Chapter 10.1, examining the impact of artificial light, the EIS assesses the potential	Thank you for your comment. This is noted and Section 13 has been revised to colour-code each receptor and assessment to give an overview of the impact interactions. Navitas has also added where a designated site or species may be affected.

Reference	Request for information	Navitas response
	impact on 'The colony of the IUCN 'Near Threatened' sooty shearwaters on Kidney Island' (pg. 604). Kidney Island is a designated as Natural Nature Reserve (NNR) and as an Important Bird Area (IBA), likely due to the sooty shearwaters amongst other birds; thus any impact on this population would arguably impact the integrity and status of this site as a NNR and IBA.	
SAMS 28	although Section 7.5.2.3.3 reports only two sites being put forward for consideration as new Ramsar Sites. There are currently 18 proposed Ramsar Sites within the Falkland Island	Navitas will revise as appropriate. Many Thank you for the comment.
SAMS 29	A strong precautionary approach would be to assume that the 18 proposed Ramsar sites as 'designated' when assessing the environmental landscape of the area, in addition to any other 'in progress' protected areas.	See SAMS 28.
SAMS 30	For fish there is emphasis on commercial species although non-commercial species are also mentioned. While this is understandable because much of the baseline data derives from fisheries surveys, in a few areas it skews the writing perhaps giving the impression that non-commercial species are of less importance – even though they may have important ecological functions. For example, on pg. 596 when discussing the effects of light, information is repeated from an earlier section which focuses on commercial species. This repetition is not really needed because this section should be discussing the known effects of light on squid and fish, rather than just repeating which species are found in the area.	Thank you for this Navitas will updated and amend. Much of the data came from Arkhipkin et al (2012) which also contains important species that are not targeted. See Arkhipkin, A., Brickle, P., Laptikhovsky, V. V., Pompert, J. & Winter, A. (2012). Skate assemblage on the eastern Patagonian shelf and slope: structure, diversity and abundance. Journal of Fish Biology 80, 1704–1726.
SAMS 31	Uncertainties have been acknowledged in the report. This leads to a confidence evaluation for some of the risks. It feels perhaps some of these have been over cautious. For example, on pg. 1179 the impact of a spill during offshore transport on toxic effects on plankton, squid and fish is evaluated as 'very low' but with 'Uncertain' confidence. Yet the supporting evidence argues rather strongly that there has been experimental testing of oils from this site using zebra fish as a model and that quite a lot is known about toxicity of crudes to fish at least (Section 12.1.4.2.3).	Thank you for the comment. The uncertainty remains because zebra fish are an analogous model.

Reference	Request for information	Navitas response
SAMS 32	The impact of the emissions on global issues such as global warming and oceanic water quality (via Ocean Acidification) have been reasonably considered, however, the background literature presented should be updated to include up to date literature, particularly in the area of ocean acidification. Two key pieces of literature that could be useful in this section include Watson (2020) and Shaw et al. (2023).	Thank you for your comment. This is noted and will be amended.
SAMS 33	it is slightly disappointing not to have more information presented on possible issues that drilling and spills may have on green and red species, as the EIS only really presents potentially impacts and mitigations linked to brown species of macroalgae (albeit limited mainly to kelps and not to other intertidal species of brown macroalgae). There is also a need to recognise that structures put in the water for oil drilling offer a potential new habitat for marine species including seaweed.	Thank you for the comment. The taxonomic status of many of our seaweed, in terms of understanding, is a work in progress. Work is on going. There is a draft report that is cited in the report. Brodie, J. & Mrowicki, R. 2019. A draft check-list of the seaweeds of the Falkland Islands. Natural History Museum, London. 31 July, 2019. Navitas will update the text regarding the offshore structures as potential new habitat for seaweeds. They identified 253 taxa from two surveys. Gaps remain in distribution and abundance.
SAMS 34	The methodology used for macroalgal species is only on kelp species and misses, as highlighted in Table 12.20, that there may be a species related response to oil spills.	Thank you for your comment. This is noted and acknowledged. There this little known about the phycology of the Falkland Islands. Kelp was chosen as it is a key species to ecosystem function in the Falkland Islands.
SAMS 35	Table 12.27 contains a summary of risks for oil spill scenarios, and highlights that the toxic effects for kelp are likely to be moderate with a low initial risk. Mitigation aspects have been highlighted, but there is uncertainty around the confidence of this event/risk occurring. However, this only covers kelp species, and nothing is presented that links to the seaweed ecosystem as a whole.	Thank you for the comment. The confidence is uncertain as the impact of oil on Falklands kelp species specifically were not tested. Analogues from the Northern Hemisphere were tested. Navitas did not assess other groups as very little is known about the taxonomy and therefore abundance and distribution. Navitas will update the text in the document to reflect this.
SAMS 36	Within the EIS, only data for kelp has been discussed. There are other macroalgal species present and as highlighted in Liu et al. (2019), oil spills can cause stress to Ulva pertusa. Other research also suggests a shift in seaweed/macroalgal assemblies/populations after an oil spill, which is important to consider when evaluating the risks and mitigations linked to the potential toxic effects of an oil spill.	Thank you for the comment. Navitas will update the text accordingly.
SAMS 37	There is lack of information on potential risks to green and red species of macroalgae. Most of any discussion around associated risks is linked solely to kelp beds and two main brown seaweed species. Considering there are around the 253 species presented in the Falkland Islands as a whole, this presents a large gap	Thank you for the comment. This should be 253 taxa (not species) and will be updated. This is what has been identified by phycologists on a recent project (Brodie and Mrowicki. 2019). However, their distribution and abundance are not known. See also SAMS 33.

Reference	Request for information	Navitas response
		Brodie, J. & Mrowicki, R. 2019. A draft check-list of the seaweeds of the Falkland Islands. Natural History Museum, London. 31 July, 2019.
SAMS 38	In the event of an oil spill, there is likely to be a shift in intertidal populations as highlighted by Zhou et al. (2019), with responses dependant on whether a species is tolerant, opportunistic or an equilibrium type.	Thank you for the comment. Navitas will update the text accordingly.
SAMS 39	Described insufficiencies have arguably influenced some of the impact assessments, especially the omission of updated literature on underwater noise impacts of Mobile Offshore Drilling Units (MODU) and some vessel types, as well as the increased knowledge about sei whales around the Falkland Islands should be integrated more in certain sections of the report.	Thank you for the comment. Whilst Navitas has been precautionary in the assessment for underwater noise there are other new developments in noise modelling and Navitas will update these sections with new noise modelling and also update the relevant chapters. See also FIFD 54.
SAMS 40	Particular attention should be made with respect to the addition of literature published on the different species in the region over the past 10 years, as currently most citations within the report provide information up to 2013 only. Suggestions include Baines & Weir (2020), Franchini et al., (2020) Weir & Stanworth, (2020), Weir et al., (2021) and Cerchio & Weir, (2022), but also see specific recommendations in the sections below.	Thank you for the comment - Franchini et al., (2020); Weir and Stanworth (2020) will be updated. The other references are cited.
SAMS 41	With respects to mitigation and monitoring for underwater noise (e.g. Section 10.5.10.1 & Chapter 15) it should be laid out in more detail how acoustic monitoring will be carried out to decrease uncertainty in operational noise levels and potential impacts on marine mammals. It would be good to elaborate on the 'hydrophone recordings' that will be used to validate noise levels, i.e. how many recorders will be used at what distances to the sources, and how will be deployed. Anchored static systems would be best for the task and all recordings should follow international standards for monitoring of underwater noise (e.g. Hannay et al., 2023; Ainslie et al., 2022).	Chapter 15 provides indicative EMMP summary tables and the EMMP workshop report proposes that an advisory committee including individuals with relevant expertise in the subjects being monitored will help draw up the specifications in any scope of work...and would also be able to comment on the results of the monitoring.' Therefore, levels of detail such as the number of hydrophones etc. are yet to be agreed. In the post consultation EIS Navitas will state in Ch 15, and 10.4/5 if necessary, that details on monitoring will be developed with the advisory committee, and ensure the timing for this (post sanction) is clear.
SAMS 42	The scope of work of noise monitoring (Section 15.6.2.1.1) should include a more comprehensive assessments of noise levels at various distances and potential impacts on cetaceans from acoustics – only monitoring noise levels near the operations is not going to fill the existing data gaps. A design using moorings or landers at different distances from	The EMMP (section 15) gives an outline of monitoring to be undertaken and a full work up of the noise monitoring programme will be developed post-sanction. See also response to SAMS 41 regarding timing for the development of detailed specifications and scopes of work for monitoring. Thank you for the Martin et al reference. The noise monitoring

Reference	Request for information	Navitas response
	the working area would provide a good dataset for future assessments (see Martin et al. (2023) for an example array design). Noise assessments and acoustic surveys for marine mammals can easily be aligned and provide valuable data for future assessments and to reduce uncertainty re impacts on marine mammals.	programme may also been informed by the updated noise modelling that will be included in the post-consultation EIS.
SAMS 43	Monitoring for underwater noise is intended to be undertaken by Seabird and Marine Mammal Observers (SMMOs) on board specific vessels. These should be supported by Passive Acoustic Monitors (PAM) (e.g., towed hydrophone or fixed archival for impact assessment and collection of baseline data); real-time PAM buoys should also be considered for mitigating impacts especially during construction/decommissioning. Monitoring of marine mammal responses to various stages of the project at different distances, using PAM landers, should also be undertaken to reduce uncertainties in some of the cited assessment parameters (Section 10.4.10.1).	Please refer to SAMS 41. Navitas will consider the use of PAM in consultation with the EMMP advisory group. Navitas will update the post consultation EIS to include this clarification.
SAMS 44	The investigation of low noise thrusters is welcomed (Section 15.7.2.3) but a stronger commitment to using noise reducing technologies with respect to propellers and other solutions for future vessels could be made, given the risk of continuous noise from on-site Dynamic Positing (DP) vessels to noise-sensitive species.	Vessels will be dry docked in accordance with their classification requirements. Hulls and propellers will be cleaned accordingly. Engines shall be maintained similarly and DP will be used only when necessary. All these actions will minimise underwater noise from all vessels. Navitas will update the post consultation EIS to include this clarification.
SAMS 45	For example, there are data on sei whale acoustics from the South Atlantic now available (e.g. Cerchio & Weir, 2022) that should be included (pg. 423). Similarly, update is recommended for Antarctic minke whales (pg. 423), which have been described since 2014 (Risch et al., 2014) and numerous publications from the South Atlantic have followed since. The species-specific review in Section 7.4.6.3.1.6 appears to omit description of available acoustic data. It would be good to cite the actual ambient noise levels recorded by Hipsey et al. (2013) rather than just giving a qualitative description. Re-analysis of the existing (and new) acoustic data should be recommended especially regarding Antarctic minke and sei whales. There is further information (e.g. Clark & Gagnon 2022) available for other species on the range of sound emitted by cetaceans that it would be advisable to include within Table 10.22.	Thank you, these references will be reviewed and included.

Reference	Request for information	Navitas response
SAMS 46	Summary tables for marine mammals (e.g. Tables 7.28 & 7.32) would be enhanced by including citations for each statement 'Behaviour' column. The content of Behaviour column should be also reviewed as it is a mixture of behaviour and distribution related comments; the relevance is unclear. It may be advisable to use categories, i.e. foraging, migration, distribution etc. for each species and fill in known facts about the South Atlantic populations of this species and/or global populations if data from the South Atlantic is missing.	Thank you for the comment. This will be taken into consideration.
SAMS 47	The review of potential oil spill consequences on cetaceans (Section 12.1.4.2.5.2) should be updated with the latest literature, particularly lessons learned from the deepwater horizon spill (e.g. Frasier et al., 2020; Schwacke et al., 2022; Marques et al., 2023). In addition, the statement that there is no indication that marine mammals associate with oil rigs (Table 12.13) has been shown to be untrue - see for example Delefosse et al. (2020) and Todd et al. (2024).	Thank you for the comments - Navitas will update this section.
SAMS 48	Some assumptions on underwater noise and source signals could be updated with newer literature (see comments below on MODU signal assessment) and newer vessel literature/databases e.g. the Joint Monitoring Programme for Ambient Noise North Sea (JOMOPANS) and Enhancing Cetacean Habitat and Observation (ECHO) project databases on vessel noise.	Thank you for your comment, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. The underwater noise sections (10.4 and 10.5) are also being updated with relevant citations suggested during the public consultation. Please also refer to FIFD 54.
SAMS 49	There appears to be a general underestimate of when potential impacts from underwater noise should be considered. For example, underwater noise is not considered during installation (e.g. Table 2.2), but anytime there are vessels on site for extended periods, the issue of noise pollution and potential for behavioural responses/stress on receptors should be considered. In addition, recent studies (Martin et al., 2023) has demonstrated impacts from the USBL signals used for positioning during MODU operations on marine mammals. These signals (at 25-27 kHz) and their potential effects, especially for odontocetes, should be considered within the EIS (e.g. within Table 10.26, Section 10.4.2.1 & Section 10.4.8).	Thank you for your comment, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. The underwater noise sections (10.4 and 10.5) are also being updated with relevant citations suggested during the public consultation. Please also refer to FIFD 54.
SAMS 50	Marine mammals might also be disturbed from impulsive, shorter term noise during drilling and construction phases of the project (Table 8.9),	Please note that there is no source of impulsive sound in the proposed project.

Reference	Request for information	Navitas response
	with concerns including behavioural responses and injury. This should be highlighted and explained better throughout the EIS. Possibilities regarding mitigation and offsetting should also be described more comprehensively and the relevant literature be cited (e.g. Martin et al., 2023; and many more).	Thank you for your comment, the underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. The underwater noise sections (10.4 and 10.5) are also being updated with relevant citations suggested during the public consultation. Please also see FIFD 54. Navitas has been unable to identify any offsetting possibilities in the literature cited. Please note that Table 8.9 does not indicate that there is no impact, only that identifying a realistic and effective direct offsetting project for this impact has not been possible.
SAMS 51	Continuous vessel presence offshore will create underwater noise which might impact marine mammals and other noise sensitive species and should be further assessed. This is similar for the presence of Large Transport Vessels (LTVs) in Berkeley Sound (Table 9.1, pgs. 565 & 569).	This is covered in Sections 10.4 and 10.5. Table 9.1 will be reviewed and checked.
SAMS 52	The EIS states that underwater noise impacts on marine mammals are most likely (Section 1.7.4.2.2). However, possible impacts on other parts of the ecosystem including seabirds, plankton, fish and benthic invertebrates can also be expected. There is growing evidence and several reviews published that show the impact underwater noise can have on the whole ecosystem, so this statement should be rephrased to not downplay effects on other species.	The underwater noise modelling is currently being re-run to more accurately reflect Navitas' proposal for the Sea Lion field and Berkeley Sound. The underwater noise sections (10.4 and 10.5) are also being updated with relevant citations suggested during the public consultation. Please also refer to FIFD 54.
SAMS 53	The literature on marine litter and impacts on seabirds and cetaceans need to be considered more throughout the document, especially to literature from the last ten years (2015-2024) Examples include the study by Padula et al. (2023) on debris impacts on odontocetes in the SW Atlantic, and Phillips & Waluda (2020) on seabirds and debris impact.	Thank you - Navitas will update this section.
SAMS 54	Although page 795 states that "… impacts to air quality have been screened out owing to distance of the offshore location from environmental and social receptors…", this statement is inconsistent with the presentation of scoping of activities and receptors within Chapter 9.	See comment SAMS 2 above.
SAMS 55	Further clarification on the distinction between 'Regional' and 'Global' air quality is recommended. This definition should be noted in the EIS and then put into practice throughout the document. Even if the impact regionally is considered insignificant, this needs to be documented within the report.	Thank you for your comment. This is noted and will be addressed in the narrative.

Reference	Request for information	Navitas response
SAMS 56	The outcomes of ENVIID workshop clearly demonstrate that concerns existed over how regional air quality could be impacted by the activities associated with the proposed development. However, assessments explicitly related to regional air quality have not been drawn out in the impact assessment chapters. The reviewer wonders whether the lack of a clear definition of what is regarded as 'regional' versus 'global' is a reason why this omission exists, and is perhaps indicative of a flaw in the methodological approach. More clarity is needed on what is considered to be 'regional', and a re-focus on how to assess activities and any associated impacts that may arise at that scale.	See comment SAMS 2 above.
SAMS 57	Although it is accepted that DREAM/ParTrack has a history use within the Oil & Gas sector (Section 10.6.4.3.1) for use in particle dispersion modelling, many other more recently developed an updated particle tracking models are available (e.g. MIKE, Delft). It would be interesting to see whether the model results produced by DREAM/ParTrack are validated by alternative models, as it would add confidence to the predictions and assessments made.	PW modelling will be redone after PW is produced (section 15.7.3.1), an update particle tracking model such as those suggested can be used to corroborate the DREAM/ParTrack model and to refresh the model with real PW data. Text will be amended in this section to reflect that an alternative model may be used.
SAMS 58	Seabird survey coverage within the drilling campaign area is not present during April, May and September (noted in Section 7.4.5.2.1.1). Whilst attempts have been made to overcome this through the Gap Analysis Programme (GAP) (Section 7.4.5.2.1.4), this study was restricted to a number of larger species that tracking devices could be deployed on. The report acknowledges this; however, it is not clear how this shortcoming is incorporated during the risk assessment process.	Thank you for the comment. This is an acknowledged gap and Navitas has applied the precautionary principle and a confidence rating to the assessment. Navitas are committed to filling this gap with SMMOs deployed on vessels for three years pre first oil.
SAMS 59	'Seabird vulnerability to oil spill' (Section 7.4.5.6) relies on data from White et al. (2001; 2002), which as previously noted is more than 20 years old. It would be desirable to try and update this classification using more recent data collected during the GAP project, and from other sightings surveys that are noted in the document.	Navitas recognise that the data is old. As noted in the EMMP workshop report (2019): 'The workshop agreed that it would be useful to collect further data opportunistically from vessels associated with Sea Lion development, but that a wider data collection effort to update seabird information was beyond the scope of the EMMP.' Update to the seabird vulnerability to oil spill atlas can only be updated with a broader area wide at sea data collection effort which would require an FIG and multi-industry collaboration and investment.

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SAMS 60	Data sources for the EIA appear relatively sound and comprehensive. Overall, the quality of the data presented is very good. The type and level of risk for environmental factors appears to have been well assessed, but the social impacts of these, where not as readily quantifiable, were more weakly presented. The EIA would benefit from improved analysis of the social impacts.	Thank you for your comment. This is noted and Navitas has commissioned a separate Socio-Economic Impact Assessment which will analyse the social impacts in more detail.
SAMS 61	Particular attention is drawn to the identification of shipping routes (Section 11.1) and the associated risk assessment which were conducted well, as much of this assessment was informed by vessel Automated Identification System (AIS) data and collision risk modelling that is widely used. Stakeholders within FIG and from the fishing industry were consulted three times over the evolution of the project, yet data from these consultations is minimally represented in this chapter as part of the confidence assessment. Again, in Section 11.2, stakeholder opinions gathered through the consultations were summarised briefly (11.2.4.4.1.3), but it is unclear how many vessel Captains/owners were consulted.	Local fishing companies (who are in some cases vessel owners) and vessel agents have been consulted throughout the evolution of the Sea Lion project. The nature of the Falklands fishing industry is such that ship's captains are not particularly accessible (they spend limited, if any time onshore, and often do not speak English). Navitas will seek to include more detail on the consultation and industry responses into Section 11.2.4.3 and all other relevant sub-sections on stakeholder input.
SAMS 62	There are some inaccuracies in statements and the use of literature in some cases could be elaborated on. Some of the cited literature is 20 years old, and there may be more recent studies with applicable data available for consideration.	Thank you for the comment. Navitas will review and update literature in the post-consultation EIS.
SAMS 63	The cumulative effect of PW discharges including traces of oil, Polycyclic Aromatic Hydrocarbons (PAHs) and chemicals could be more specific, and using more up-to-date literature to describe the impact should be considered. Similarly, except for chemical characteristics, it is important to include loading (concentration x volume) (see Gagnon et al., 2011). No effect on combined factors is discussed, for example temperature and hypersalinity, which may have wider consequences on ecosystems (e.g. Smyth & Elliott, 2016); possible effect on pH is not discussed either.	Thank you for the comment. At the time of writing, dosages and quantities of chemicals that will used will be further defined pre-operations and will be submitted to FIG for pre-approval. Although, as stated in ED 118 (and numerous other comments), all chemicals will be selected from the OCNS ranked listing to minimise environmental impact. Further, the PW will be monitored in line with the RBA as described in Section 10.7.1.1.1.2 and 15.7.3.1. Nonetheless, the section will be updated with further literature review.
SAMS 64	'Disturbance to seabed', 'Oil spill – offshore' and 'Fuel Oil spill – inshore' are not directly considered as activities that may have an impact on water quality (see Table 1.7). Whilst the presence of oil within water and associated impact on other receptors is considered within Chapter 12,	Thank you for the comment. All summary tables will be reviewed and amended as necessary.

Reference	Request for information	Navitas response
	the impact on water quality is not explicitly highlighted. Disturbance to the seabed may led to resuspension and dispersion of pollutants and materials that would otherwise be settled on the seafloor	
SAMS 65	Examination of Figure 12-39 reveals that more than 50% of oil from a bunkering spill leaves the model domain after six days, which is a substantial portion of the pollutant to lose from the model and still be confident of predictions of end behaviour. A larger domain would likely be more appropriate to better understand the behaviour of Marine Gas Oil (MGO) after such a spill.	As stated in Section 12.1.4.3.4.1: 'Model results are collated and reported via a 3D grid, and for each scenario the grid layout has been chosen that maximises the accuracy of the outputs by focusing on the area occupied by the vast majority of oil particles for the period when they are most likely to present significant environmental impacts.' Owing to the volatility of MGO and the highly dynamic environment at the Sea Lion location regarding wind and wave action, the grid size is selected to demonstrate the worst-case outcome of the MGO spill. Section 12.1.4.8.1 states, 'the surface MGO is expected to decline very quickly, as it gets dispersed by wave action, and also evaporates and biodegrades. The model predicts that after 2 days from discharge, no MGO will remain on the surface. By 4 days, 31% will have evaporated, 25% will have biodegraded, and the remainder of the discharge will either be dispersed in the water column or dissolved. The MGO also starts to exit the modelling grid at 4 days, and the trend of the dispersed oil being degraded continues in the water column beyond this point, no MGO is predicted in sediments.'
SAMS 66	Within Section 7.3.3.3 it is unclear whether the current speeds presented for the Sea Lion Field result from actual measurements from contracted survey work, or if the information is based on published data from other sources.	This data came from BMT Argoss. 2015. Sea Lion Hydrodynamic Modelling – Final Report. Reference Number: A14043_Final_Report_r1. Prepared for Premier Oil Exploration and Production Limited and the reference will be added.
SAMS 67	The presence of Naturally Occurring Radioactive Materials (NORM) within PW is discussed in Section 10.7.4.1.2.1, although there are some inaccuracies. The statement about gamma radiation is incorrect, as not all radionuclides emit gamma rays. Indeed, the two described radionuclides, 226Ra and 228Ra, are α and β- emitters respectively. The activity of these radionuclides can be, however, estimated via their gamma emitting parents or daughters when aiming at the particular energy peaks of the gamma spectrum. There is no information on any existing data pertaining to the radioactivity of the ground water, and a lack of information about	Thank you for your comment. This is noted and the text will be amended with updated references for clarity. NORM build up typically takes time and only becomes a concern when Produced Water (PW) breakthrough occurs. The base case is to reinject the produced water (PWRI).

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	possible impacts. This section needs an update as it has been shown that radioactivity in the environment may be elevated due to discharges of PW (e.g. Eriksen et al., 2006; Ahmed et al., 2021).	
SAMS 68	Within Section 10.10.2.2.1 it states that 'some oily wastewater from the onshore mud plant' may go to sewer under consent, or alternatively be sent offshore for processing. It is not clear whether this has been taken into account in the figures used, although suspected to be a minimum quantity comparatively as thus likely accommodated within the assessments made.	Onshore oily waste water will not go into the Stanley sewerage system unless under consent from FIG. Onshore operations which may result in oily water discharge will be completed in a bunded area which will contain the oily water, this will then be treated, incinerated or dealt with away from the sewerage network and shall align with Navitas' Waste Management Procedure. This will be clarified in the post consultation EIS.
SAMS69	Section 10.7.4.1.5 discusses the discharge of hypersaline water from vessels, using Roberts et al. (2010) as a primary source. This study is based on nearshore, shallow water environments. An example of more up to date literature is Dewar et al. (2022), which describes plumes of hypersaline water in open ocean environments, and thus arguably could help inform this section further. It is unclear if the second paragraph in this section still refers to Roberts et al. (2010) or to an experience with such plumes from the past. Turbidity impacts due to hypersaline discharges are omitted from this section. Similarly in Sections 10.7.4.2.5 & 10.7.4.3.1 only Roberts et al. (2010) is cited, while more relevant and up to date literature may be available and would add value to the assessments made.	Thank you for your comment. This is noted and the subject matter will be reviewed and the narrative updated where necessary.
SAMS 70	• Species scientific names are not always italicised and need some attention. Examples include Patagonotothen ramsayi & T. gaudichaudii on pg. 294; P. brevicauda on pg. 339; D. gahi on pg. 340; Allothunnus fallais in Collette reference on pg. 1315. • Figure 1-1, pg. 29. The text within the figure is small and of low resolution, making it difficult to read. • Section 7.2.2, pg. 246. Typographic error, with a space missing – 'Figure 7-4and Figure 7-5' • Figure 7-22, pg. 272. The size and resolution of the Figure means that the data (wind vectors) is not easily readable. • Section 7.3.7.1.2.1, pg. 279. Units for PAH concentrations are given as 10 µg/g-1; this should be either µg/g or µg -1. Comparing this section to section 7.3.7.2.2 shows units written as µg.g-1 – for consistency, it may	Thank you for your comment. This is noted and will be amended.

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	be worth revisiting how units are expressed across the whole document. • Table 7.2, pg. 289. There is no indication of the units for the metal concentrations provided within the table; presumably these are all µg.g-1. • Section 7.4.1.2.1, pg. 292. Typographic error in the 4th paragraph, there are two spaces between 'community' and 'shows'. • Figure 7-41, pg. 314. Typographic error in the legend for the Figure, which reads 'intertidal habit map…'; this should be 'habitat'. • Table 7.8, pg. 328. The entry for 'Offshore benthic flora & fauna' in the 'NFB and the Sea Lion Field' contains text related to Berkely Sound, not the NFB/Sea Lion field. • Section 7.4.4.3.1.1, pg. 339. The last paragraph cites Brickle (2005); within the reference list there is Brickle et al. (2005a) or (2005b), and Brickle et al. (2005) (pg. 1311). It is assumed that the in-text citation should be Brickle et al. (2005c), and the last reference should be amended. • Section 7.4.6.1, pg. 413. There seems to be an omission - baleen whales may also feed on small schooling fish, not just plankton. • Section 10.1.6.1.1, pg. 603. The text states there are 'negligible numbers of any species of geographical importance'. This is written in quotes, and thus implies that it has been taken from some other paper or report, but no source is given. • Section 10.4.1.1, pg. 655. Marine Strategy Framework Directive (MSFD) regulations should be included within the relevant legislation for underwater noise impact assessments. • Section 10.4.4.3.1, pg. 663. In text citation is written as CeliMonica et al. 2015; the reference list details Celi et al., 2015. • Figure 10-27, pg. 729. The Figure legend states "Total environmental risk to the sediment at the NA-P-01 DC at end of drilling, 5, 10 and 20 years after drilling"; however, there are only panels provided to show 'end of drilling' and '20 years after drilling' – the 5, 10 & 20 years are absent. • Figure 10-30, pg. 768 & Figure 10-31, pg. 769. Both Figures have very small axis font sizes, particularly the bottom panels, resulting in a lack of clarity over the orientation and the scale of the plume.	

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	• Figure 10-36, pg. 788. Similar to the above comment, Figure axis labels are small and illegible. • Table 10.63, pg. 816. Within the 'Currently expected base case' for 'Power generation on the FPSO', the third sub-bullet point starts 'd water'. It appears that the beginning of the lie is missing, with the line likely supposed to read 'produced water'. • Section 12.1.4.2.1, pg. 1091. Typographic error in species names; should be 'Euphausia lucens' not 'Euphauis lucens'; 'Acartia tonsa' not 'Arcatia tonsa' • Section 12.1.4.2.3.2, pg. 1093. The sentence on testing of Sea Lion crude on zebra fish eggs is clumsily worded and could be mis-interpreted that zebra fish are found at the project site. The wording should be revised to make clear that zebra fish were used as a model test organism. Furthermore, larvae may be more sensitive to pollution impacts than eggs and this should also be made clear so that the experimental data are not over-interpreted. • Figure 12-33, pg. 1137. There are no scale bars/legend provided for the panels to aid in interpreting the different colour ramps displayed. • Table 15.2, pg. 1263. For row '10.6 Drill muds and cuttings', 'Table 15.4' is repeated under the 'EMMP action' column. • Section 15.4, pg. 1265. Formatting error, with a change in font for 'Table 15.4 and Table 15.5 respectively.' • Table 15.5, pg. 1273. The row for 'Nuisance to the human population' appears incomplete, with blank boxes. Following convention used in Table 15.4, a '-' or 'n/a' should be added as appropriate if there is no information for these boxes. • Reference List & pg. 663. Hawkins and Popper (2017) & McCauley et al. (2001) are not in the reference list. • Reference List & pg. 665. Richardson et al. (1995a) is missing from the reference list, or mis-typed. • Reference List & pg. 717. Cranford et al. (1998a) is missing from the reference list • Reference List, pg. 1307. In the reference list, Balushkin 1992 and	

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	Balushkin 1994 are in the wrong order because of a missing comma in the former.	
Xodus 1	Page 170: There is no evidence presented to demonstrate the selection or analysis process used to assert that fuel use will be minimised, other than reference to the use of electric drives (rather than mechanical turbine drives for pumps/compressors).	Navitas has committed to reducing and minimising its emissions. By way of example, in FEED for the FPSO Navitas has instructed the contractor to implement practical technologies to minimise emissions. Navitas shall continue to consider and implement reduction measures throughout execution and operations phases of the development and, as explained in the EIS, these shall be detailed in the EMMP and Navitas shall be accountable against this. It should be noted however, The Field Development Plan and EIS is based upon using an existing FPSO and there is a balance between the potential benefit of reusing existing equipment and replacing with new equipment within the constraints of the existing facility.
Xodus 2	Pages 170/171: There is significant difference in terms of potential efficiency gains by employing a CCGT, in the region of 15 to 20% and we would expect to be considered in an analysis of the energy efficiency of the system.	Refer to Answer to 1 above
Xodus 3	Page 171: VSDs (usually employed as Variable Frequency Drives) offer a huge potential to reduce energy usage and associated emissions. It is a well-established, widely adopted, and proven technology. Fixed speed motors cannot be considered ALARP, unless offset by careful sizing and sparing strategy that would make the additional capital excessive.	Refer to Answer to 1 above
Xodus 4	Page 171: Power factor correction is reducing reactive power, through addition of capacitors or other measures, to reduce overall power consumption required for the same useful output. This is a well proven technology, widely used in onshore and industrial applications, but not traditionally employed in offshore oil and gas developments.	Refer to Answer to 1 above
Xodus 5	Page 171: It is apparent by inspection that through the application of readily available technology and carefully matching the electrical demand to the power plant output then a significant reduction in fuel use related emissions can be achieved over that currently proposed. For	During the FEED phase the Electrical Load List will be further refined to minimize power demand. Motor starting cases and options (including the potential selective use of VFD's, soft starters, low in-rush motors, Voith couplings, etc) will be reviewed with the goal to minimize fired power

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	example, if sufficient design changes were implemented to reduce the apparent load to allow operation on one gas turbine at maximum efficiency, fuel gas savings of nearly 50% would be possible, over those values currently stated	generation units online within the practical constraints of a redeployed FPSO.
Xodus 6	Page 169: Proposed use of gas fired steam boiler for heating injection water and maintaining available auxiliary steam boilers are a concern. This heating duty could potentially be met with heat supplied from the WHRU. Our experience of new build FPSO design provides a comparative example with heating of oil and produced water (to 90°C vs. the stated 70°C for the Navitas FPSO), and all marine system heating being served with heating medium carrying waste heat and heat integration. Heat integration does not appear to have been considered. Technical justification should be provided to show why an additional steam boiler is required and that the duty cannot be met with waste or integrated heat.	Refer to Answer 1 above Additionally, it should be noted that a further optimization of the Pre-FEED design has been completed since the submittal of the EIS and the additional steam boilers have been removed from the design and the existing Auxiliary Boiler will be converted to fuel gas service from liquid fuel. Please note that WHRUs do exist on the current Gas Turbine Power Generation Units and it is not practical to retrofit on the redeployed FPSO.
Xodus 7	Page 169: The requirement to have auxiliary boilers (and to run them for 1 day per month) should also be reviewed. With adequate design, a high availability should be able to be achieved for the WHRU and heating medium system (the WHRU is simply a mechanical linkage attached to a louver in the exhaust stack, with very little to go wrong).	Please see response to item #6.
Xodus 8	Page 154: There is no immediately apparent technical reason why any continuous flaring would be required to commission and start up the gas compression system. Small, transient amounts will be flared if the system is shutdown and restarted multiple times as would be required during commissioning, however each start/shutdown cycle would be, indicatively, in the region of a few tonnes of gas. Our recommendation would be that concurrent flaring to allow oil production is unacceptable and technically unnecessary. The plant start up should prioritise production of the highest GOR well possible to provide hydrocarbon gas for starting the gas plant, prior to commencing oil train start-up, or detailed technical justification provided as to why this is not possible.	The FDP and EIS plan to execute a start-up with minimal flaring of Associated Gas, we have provided for the normal sequence of an oil production facility. Normal practice is to start Utilities, then introduce production fluids through the separation system, establishing steady state flow. During this temporary short term period, Associated Gas is flared, until the Gas System can be put online. The EIS has made an allowance for flaring during these commissioning activities however Navitas will work to minimise these periods during design and operations phases.

Reference	Request for information	Navitas response
Xodus 9	Page 177: Section 5.8.4.3 Gas Management System, states: “Where possible, any gas not required for fuel or lift gas will be reinjected into the GI well.” “Where possible” is very non-committal language for a crucial part of operating philosophy, with respect to minimising emissions. Flaring of produced gas with a no export route constitutes routine flaring and would be at odds with World Bank Zero Flaring initiative.	To clarify, there is no plan for routine flaring, this is clear in our FDP. Any excess gas not being used for lift gas or used for fuel gas will be re-injected and flare reduced to minimum safe flare
Xodus 10	Page 182: Section 5.8.5.4 Produced water process describes the use of a degasser and potentially gas floatation unit. Both of these will have a low-pressure hydrocarbon vent stream – it should be confirmed that this stream is recovered to the flare and/or VRU.	We can confirm the use of Hydrocyclones and a Compact Gas Floatation Unit (CGFU) for Produced Water processing. It is confirmed that vapours from the low pressure CGFU will be captured via the VRU.
Xodus 11	Page 801: By inspection the rated power for some of the process pumps appear very low considering the proposed design rates, notably the “Degassed Water Pumps” – at 72 kW.	Produced water processing rates for the Sea Lion FPSO align with the current design rate of the analogous FPSO for the purposes of the EIA, and as such the rated power is deemed adequate.
Xodus 12	Page 795: Given the links between the Falklands and the UK, the NSTD and OGA Plan for emissions reduction guidance should be referenced and the applicability discussed.	The EIS complies with FIG regulation, and the NSTD / OGA policy guidance referred to has not been adopted by the Falkland Islands.
Xodus 13	Page 799: Review and document selection of main power generation technology, considering as a minimum CCGT; other hybrid and or renewable generation (e.g. wind) may also be considered to supplement gas power generation.	Refer to Answer 1.
Xodus 14	Page 815: A holistic and integrated review of power generation usage profiles, taking into account the above possibilities to ensure that fuel use and related emissions are minimised. Ensure all power users are accounted for and dynamic loads (power vs. throughput curves) used for main items of equipment, e.g. compressors and water injection pumps.	Please refer to our comment # 5
Xodus 15	Page 820: Recalculate and provide justification for FPSO power generation fuel use. The fuels gas use values appear to be arbitrary, with the incorrect assumption that power use declines with oil production and no calculation or justification provided. The fuel use should be linked to the fluid processing rates, equipment capacities and include consideration of generator efficiency curves.	Power use will reduce over time for the FPSO. As Oil production decreases so does Associated (Produced Gas), requiring less compression power as Re-injection Gas rates will decrease. Water heating requirements will reduce over time and the injection power requirements will remain at approximately the same level until Total Produced Liquids rates fall below the nameplate capacity of the facility and, therefore, voidage replacement requirements decrease.

Reference	Request for information	Navitas response
Xodus 16	Pages 34, 130, 168, 177, 591, 603, 797, 1269: Provide clear commitment to, and design basis for, gas reinjection: i) there is an apparent discrepancy with produced gas rates and ability to re-inject this gas should be clarified	There is no discrepancy between Produced Gas Rates and Re-injection in Phase 1. Sufficient Gas Compression capacity exists to re-inject all Associated Gas. Gas Lift rates will vary within the Gas Compression design limits to ensure Gas Injection is maintained.
Xodus 17	Emissions spread-sheet: ii) assumed availability of gas re-injection is 98.4% (shutdown for 6/365 days per year) - this should be backed up by calculation to show that this high availability is achievable based on equipment selection, sparing and maintenance plans, e.g. through RAM, and reference to OREDA (Offshore Reliability Database) values, or similar, and matched to predicted production profiles, referencing P10/50/90 cases as applicable.	RAM studies will be completed during FEED to validate the assumed availability. If the reliability is lower production will be temporarily curtailed thereby not negatively impacting emissions. Furthermore see response to #19
Xodus 18	Page 827: Provide clear design basis for vapour and flare gas recovery, considering stripping gas rates, reasonable valve leakage rates and purges. It should document operability, maintainability and resultant availability of the lowpressure flare and vapour recovery systems, backed up through calculation, e.g. through RAM modelling, and reference to OREDA (Offshore Reliability Database) values, or similar, and matched to predicted production profiles, referencing P10/50/90 cases as applicable. The terminology “VRP” or “VRU” is often used to describe a type of scrubbing system that removes volatile organic components (VOCs) or nonmethane NM-VOCs. This system recovers some of the heavier components from the vent stream, while the residual methane is vented. Best practice would be to integrate the VRP with the FGR and recover the HC gas back to the process.	HP Flare will have no continuous feeds to flare system. HP system purge will be Nitrogen. LP Flare will have several continuous feeds to the flare system including Cargo Tank fuel gas blanketing, LP system fuel gas purge, various low pressure feeds from Process Systems (e.g., Produced Water CPFU, Oil Treater Overheads, etc) – as the LP Flare system will be a closed system, all will be captured via the VRU.
Xodus 19	Page 820 & Emissions spread-sheet: The production uptime is assumed to be 100% for the calculations, however there are conflicting statements within the EIS. In Table 10.63 it is stated that “Fuel gas is expected to be available for 93 - 95% of the time. Downtime of the fuel gas relates to times of no production due to planned or emergency shutdowns”, however in Section 5.8.3.2 “it is expected that fuel gas will be available	In presenting emission values based on 100% uptime Navitas has presented the conservative values which provides an over estimate of emissions to cover all scenarios, essentially bounding the upper limit which is in accordance with the agreed EIS philosophy. This scenario assumes 100% uptime of gas whereas the downtime is

Reference	Request for information	Navitas response
	for 100% of the time once the system is fully commissioned." We would expect uptime to be between 85 – 95% of the time, and the emissions calculations adjusted to reflect this.	factored in for diesel use i.e. fuel gas and diesel both in use when fuel gas is down.
Xodus 20	Emissions spread-sheet: It is recommended to align the production uptime with that used in the economic and reservoir/production modelling.	Please refer to our comment #19.
Xodus 21	Page 816: The production profile, Figure 5-8, shows gas, total fluids and water injection rates all increase until year 15. The oil rate reduces but this could only account for a small portion of the reduction perhaps a 100 kW, and likely and oil transfer pumps would simply be in recycle. Further the water handling rate increases offsetting any reduction. The statement: The need for power over the life of field decreases as production volumes decline appears to be fundamentally incorrect. The entire premise of fuel gas use calculation appears questionable. This is of major concern as these emissions make up approx. 80% of the total life time emissions.	Power requirements will reduce over the life of the field. After Year 1 it heating of the Injection Water will no longer be required. Oil heating requirements will reduce with lower oil production rates. Injection Water/Produced Water pump power demands will remain approximately equal until Total Produced Fluids drop below nameplate (once Oil rates cannot make up the difference between the capped Produced Water Treatment capacity and the Total Fluids processing capacity) and the voidage replacement requirement starts to decrease.
Xodus 22	Page 169: In our experience, the peak efficiency of a Solar Mars on fuel gas is around 35%. We did an approximate calculation for the fuel gas rate to the turbines in years 1 and 2, assuming a 50/50 split of fuel gas turbines, on full load and a fuel gas composition of approximately 75% CH4, and the resultant efficiency was around 20%. This suggests that the turbines are operating inefficiently for the majority of the asset life and possibly indicates an overestimation of fuel gas requirements	The Sea Lion EIS has utilized conservative efficiencies which provides an over estimate of emissions to ensure we capture all potential scenarios. The Aoka Mizu was used as an analogous vessel for the purposes of the EIS.
Xodus 23	Page 800: The key consumers of electricity (Table 10.55) have single assigned values for power demand. This is incorrect, especially for intermittent sources such as offloading and propulsion. In addition, the sources do not include any associated equipment for FGR or the VRP. We would typically expect an increased power consumption resulting from the inclusion of additional equipment such as a compressor. If this is incorporated into Table 10.55 it should be clearly labelled as such. However, given the statements above, the power use profile appears not to have been used in estimating the fuel gas consumption	Navitas did not use the power use profile. A flat fuel consumption profile was assumed that will be conservative in the related emissions estimates. The post consultation EIS will be reviewed to ensure that this is clear.
Xodus 24	Page 828: There is misalignment in the approach to inclusion of indirect GHGs, as the language in Section 10.9.4.5.1 suggests omission of these would be an underestimate of emissions. However, IPCC reporting does	Navitas will delete the sentence: "Further, they do not include the indirect gases."

Reference	Request for information	Navitas response
	not include indirect gases, and therefore any reference to these being an underestimate should be treated with caution.	
Xodus 25	Page 819: The required [HP purge and pilot] rate [is] affected by flare tip and seal design, and should be carefully considered, with a view to minimising. Robust means to measure and control the purge rate are also essential. We would also suggest investigating the option of an inert gas purge (e.g., nitrogen) to reduce continuous emissions and maintain the integrity of the flare.	The purge rates for the Aoka Mizu have been confirmed to be significantly lower than originally informed in the EIS – additionally, refer to the clarifications provided to the comment on Page 827 above (Comment #18). Navitas shall update the Post Consultation EIS accordingly to this effect.
Xodus 26	Page 177: We would typically expect consideration of a ballistic ignition system for FGR, allowing the pilot to be removed while providing a reliable spark. This does, however, require a robust flare monitoring system. Several sections of the EIS refer to the removal of a pilot as "not currently sufficiently proven", however this has been routine in Norway for a number of years. Although not suitable for every installation, it is something we would expect to be assessed for the development.	Navitas will review and monitor the technology and consider implementation when appropriate. Navitas will review the post consultation EIS to ensure that this commitment is clear and consistent throughout.
Xodus 27	Page 826: The inventory blowdown calculation (Section 10.9.4.4.5.1) is based on a specified time and gas rate, based on the 15 min API requirements. However, depressurisation will continue beyond this 15 min period in reality. A simple and more accurate approach is to consider the change in mass of gas using the actual pipe/vessel volume and the start and end pressures. This would provide a more realistic and accurate representation of the inventory release. It is also noted there is an error in the total calculated CO2e emissions in Table 10.69 (missing decimal point).	The missing decimal point will be corrected in the post consultation EIS. Due to the typical pressure decay curve associated with a blowdown the mass inventory remaining after 15 minutes would be relatively insignificant in comparison. Please note that the inventory blowdown calculation will be refined during FEED.
Xodus 28	Page 827: Inert gas changeover: Section 10.9.4.4.5.2 Venting emissions offshore states a value for the HC gas emitted during the changeover, which is reasonable, but this value is not included in the calculations, on the basis the availability of the VRP cannot be estimated, yet the this is comparable to the number of ESDs assumed, or the assumed number of days per month that gas injection is not available. The residual methane and VOCs evolved from the stabilised crude when blanketed within inert gas are also not included.	The cargo blanket gas has been updated to Fuel Gas from Inert Gas so this comment should be satisfied. The Fuel Gas blanketing the Cargo Tanks will be recovered via the VRU.
Xodus 29	Page 827: Section 10.9.4.4.5.2 states "venting estimates are not included in the overall estimates of the development emissions, or annual average,	The RAM study to be conducted during FEED will help inform the anticipated number of venting events. Operational data will be used from

Reference	Request for information	Navitas response
	as it is not possible to credibly estimate how often this may be required". However, the emissions are then estimated as 78 tonnes.	first oil to inform the Sea Lion Emissions model. During the commencement of Production and over the first year of production, it is reasonable to assume spurious trips will be more frequent then decrease as the Operations team becomes more experienced in the operation of the FPSO and any residual Commissioning issues are addressed. Navitas will review the statements on venting in the post consultation EIS, and will include an estimate for fugitive emissions.
Xodus 30	Page 130: "This associated gas will be used for fuel on the installation, for 'gas blankets' in cargo / slops tanks and for 'gas lift' to improve the oil recovery. Any surplus gas will be re-injected into the GI well." It is noted that there is "dehydration" gas process which typically uses fuel gas as stripping gas. There is no mention of this fuel gas user. Query if this is the case, and if so, should be captured in emissions etc. or discussed as a user that is recovered in the closed flare or VRU	Stripping Gas from the Gas Dehydration Unit will be recovered via the LP Flare system to the VRU.
Xodus 31	Page 168: Table 5.14. Is gas handling capacity going to be upgraded prior to Phase 2? There is no mention of this. Important as gas production would exceed Phase 1 design rate and will result in large amounts of flaring.	Emission calculations are consistent with our plan to deliver Phase 1 & 2 production. Navitas will update Table 5.14 in the post consultation EIS, and ensure that the information presented is consistent in the FDP. Section 5.8.2.2 will be edited to read; 'The FPSO will be designed to deliver the FDP production profile for both Phase 1 and 2. Minor upgrades to topsides equipment or updated operating procedures may be implemented to achieve target rates.'
Xodus 32	Page 176: "Flare purge and pilot" It is noted that there is no inclusion of Flare Purge rates within Chapter 10.9, and therefore no emissions associated. Specifically, important for purge rates on HP flare as current design states that this flare is not closed.	Please refer to the comments made to #18.
Xodus 33	Page 177: "The FPSO has a gas handling / compression capacity of 50 mmscfd."	

Reference	Request for information	Navitas response
	Table 5.14 states that gas handling for Phase 2 will be 130 MMSCFD. 50 MMSCFD may not cover anticipated production profile, or gas lift requirements. This may result in additional flaring and increased emissions.	Emission calculations are consistent with our plan to deliver Phase 1 & 2 production. Navitas will update Table 5.14 in the post consultation EIS, and ensure that the information presented is consistent in the FDP. Section 5.8.2.2 will be edited to read; 'The FPSO will be designed to deliver the FDP production profile for both Phase 1 and 2. Minor upgrades to topsides equipment or updated operating procedures may be implemented to achieve target rates.'
Xodus 34	Page 169: It is unclear if the production P50 profiles, e.g. in Figure 5-8 is the associated gas rate, or the total gas rate, including gas lift (which is essentially circulated). It would be good to see a clear balance of associated produced gas profile, or maximum rates compared with the gas injection capacity, and the total gas plant rate matching with compression train capacity	The simulated production profile displays produced gas, which does not include gas lift. Navitas can deliver the profile within the stated facility constraints. Navitas shall update the Post Consultation EIS accordingly to this effect.
Xodus 35	Page 177: "On the High Pressure (HP) flare system there are no continuous sources such that no recovery system is required" It is best practice to close the HP flare by design. It is anticipated that the HP flare system would have purge gas, typically fuel gas, which would be considered a continuous source to flare. Additionally, closed flare system would allow for the capture of any other intermittent sources, or for example passing valves.	Please refer to the reply to comments made on #18. It is common practice in recent developments to apply a Closed Flare design to the LP Flare system (as is being done here). Applying a Closed Flare design concept to the HP Flare (in addition to the elimination of any continuous flare sources, including purge gas, as noted above) is much less common, due to the inherent increased consequence of a failure in the fastacting valve system and additional safeguards.
Xodus 36	Page 177: "The pilot flames are expected to burn approximately 0.5 - 1 mmscfd." Flare pilot rate is stated to be very high (based upon EIS 0.5 MMSCFD = approx. 14 tonnes per day). It is generally anticipated that flare pilot typically be an order of magnitude lower.	The statement, as written, is overly conservative these values include continuous flare sources, including fuel gas purges (which, as noted above, have either been eliminated via Nitrogen purge for the HP Flare, or captured back to the VRU for the LP Flare). Navitas shall update the Post Consultation EIS accordingly to this effect.
Xodus 37	Page 193: "use of fuel for the back-up generator would be offset against the reduced fuel use at the power station such that no additional emissions would result." No calculation to back this up.	The comment assumes that power generation efficiency is equivalent. Navitas shall update the Post Consultation EIS accordingly to this effect.
Xodus 38	Page 211: "No routine flaring during normal production (notwithstanding the flare pilot light), "Use of a Flare Recovery Package during normal operations,"	Please refer to the comments made to #18.

Reference	Request for information	Navitas response
	Continuous flare source would also include flare purge (assuming that this is fuel gas purge). This would be recovered in LP flare, however as HP Flare is not closed this would be continuous emissions to atmosphere.	
Xodus 39	Page 797: Global Methane Pledge - OGMP 2.0 Framework should be referenced as best practice.	The UK has signed up to the Oil and Gas Methane Partnership (OGMP) 2.0 in 2022, but Navitas' understanding is that this does not include the Falkland Islands. EIS Section 10.9.1.1.2 currently includes the statement that 'Navitas strive to comply with the principles of the Methane Pledge with the target of zero cold venting as part of the Phase 1 & 2 Development basis of design, and similarly with the ZRF initiative to achieve zero routine flaring. ' Navitas are aware of the updated GMP 2.0 Framework and that the UK has signed up to this. Once UK legislation has been amended to enact the requirements of the GMP 2.0, Navitas will review the requirements, and its commitments, in discussion with FIG. This will be added to the post consultation EIS for clarity.
Xodus 40	Page 800: Table 10.55 Power demand rates should consider transient operations, particularly propulsion and offloading.	The Load Study will be revised during FEED. Propulsion power requirements are expected to be very low, which will be reflected in the Demand Factor of the Load Study and is not expected to impact overall Power Requirements. Offloading cases will be defined specifically in the Load Study – Load Shedding may be implemented.
Xodus 41	Page 804: To mitigate any uncertainty, only AR5 without climate feedback should be presented in the main body of the report and used for the subsequent calculations	All calculations have been carried out using the AR5 W/O feedback. Different GWP values are only used to enable like-for-like comparisons where the dataset being compared to used GWP's other than AR5 w/o carbon feedback. Where this is necessary, this is indicated within the relevant EIS section.
Xodus 42	Page 808: Ocean acidification - unclear why this is included but not any other element of the physical environment.	Ocean acidification is itemised as this is a separate impact resulting from CO2 emissions and does not fall under the umbrella of impacts associated

Reference	Request for information	Navitas response
		with climate change. The known impacts of emissions are described in Section 10.9.4.2 on the 'Nature of the Impact' which itemises the broad physical impacts associated with climate change, ocean acidification and acid deposition. The climate change impact assessment does not itemise each physical impact e.g. sea level rise, changing climate zones etc. as it is not possible to meaningfully assess the severity of effect that may result from Navitas' emissions alone. Of note, The DMR EIA guidance requires the EIS to look specifically at the impact of emissions on water quality (4c of Schedule 4), see Appendix 2 of the EIS.
Xodus 43	Page 817: Table 10.63 – "Production levels at the P50 case" Inclusion of associated produced gas for context of fuel gas usage would be beneficial.	This is shown in the 2C production profile (Figure 5-8).
Xodus 44	Page 812: Figure 10-37 Figure is outdated, and more relevant information is available from NSTA for current operations. No indication of boundaries of this figure (e.g. scope of emissions).	Navitas shall update the Post Consultation EIS with a graph detailing the actual numbers.
Xodus 45	Page 816: "the average fuel gas consumed will be c. 5.5 mmscfd." The approach of averaging the fuel gas consumption does not account for the gas turbine efficiency or adequate capacity for different operating modes. This could result in the equipment being undersized for the required capacity.	The Fuel Gas System will be designed to accommodate peak Fuel Gas Rates as dictated by the Power Generation System.
Xodus 46	Page 817: "POEPL assumed a conversion rate of 1 mmscf gas = 27.8 t, which, based on the samples, Navitas consider to be highly conservative" One gas composition (and therefore conversion rate) should be used for both cases. As the gas composition is available, we would expect asset specific emissions factors for flaring and venting estimates, as this would provide more accurate figures. The gas composition is changed between base and worst cases, which is the source of about ~60% of the difference in FPSO related emissions (gas conversion rates given in Table 10.63). Typically, we would expect	Updated conversion factors and emissions factors will be considered by Navitas in the future update of the EIS and/or when reporting annual emissions. Navitas used a conservative conversion rate for the worst case but will use the Navitas calculated conversion rate for both cases in the post-consultation EIS following consultation with FIG. The post consultation EIS will be checked to ensure that the quoted gas composition is consistent throughout.

Reference	Request for information	Navitas response
	this to remain constant for a fair comparison, with a sensitivity for both cases if the composition is unknown.	
Xodus 47	Page 819: Table 10.63 implies that combustion of the sold product emissions is considered for the worst-case only. The boundary of the assessment should be clearly defined and consistent for both cases.	Table 10.63 will be clarified in the future EIS update to reflect that Combustion of sold product would be the same for both worst-case and current expected scenarios. At this stage the final use of sold product is not known, so Navitas have assumed a worst-case that all is combusted. Navitas will update the post consultation EIS and merge cell across both columns of table 10.63 to reflect this.
Xodus 48	Page 820 Emissions spread-sheet: Vessel fuel consumption The fuel consumption is calculated as an average of different activities. For clarity each activity fuel consumption and expected days should be outlined.	The daily vessel consumption is based on an averaged consumption rate. This provides the clearest, fairest and most logical approach to establishing the long-term vessel usage and emissions. Taking the example of a PSV (Pacific Leader): - 7.5mt per 24 hours in transit at economical speed (11kts) - 14mt per 24 hours in transit in heavy weather at 14kts - 5.55mt per 24 hours station keeping on DP alongside the MODU or FPSO - 3mt per 24 hours when “drifting” on a single engine outside the 500m zone of the MODU / FPSO awaiting loading / discharge operations - 2mt per 24 hours when alongside a harbour (such as the TDF) Splittng the vessel usage timings across a 30-year schedule on this basis would be unrealistic. Again, looking at the PSV usage by way of example, a 48-hour period could consist of the following activities: - 12 hours transit at 11kts from TDF to FPSO - 2 hours waiting on the FPSO to be ready (drifting on a single engine) - 3 hours on DP offloading cargo - 2 hours drifting - 3 hours on DP backloading cargo - 14 hours transit at 11kts from FPSO to TDF through heavy weather - 9 hours go to anchor awaiting a berth at the TDF - 3 hours alongside the TDF The averaged consumption rate for all example vessels has therefore been based upon:

Reference	Request for information	Navitas response
		1. Expected usage pa□erns 2. Previous analogous experience and case studies using typical vessel types Navitas believe that this provides a conservative, true and fair usage / emissions benchmark across the lifetime of the emissions model and will work to optimise and reduce during the field life.
Xodus 49	Page 821: Table 10.64 – "Unplanned Events" Does this capture flaring on start-up following the shutdown, as well as the emissions associated with the shutdown event itself?	Navitas can confirm that the table includes flaring during startup post an unplanned shutdown.
Xodus 50	Page 822: Table 10.65 Emissions factors use multiple sources. Suggest for each activity a single source is used. For consistency this should be one data source. Where gas composition is available, asset specific factors should be used for flaring and venting.	EEMS was not used because there are more recent EFs available from reputable sources for calculation of direct GHGs. Calculation of the annual GHG Inventory Navitas must do during operations must be done by the GHG Protocol and ISO14064 standards which requires the most recent emissions factors available – EEMS is outdated for direct GHGs, but UK government factors do not include indirect EFs. Indirect GHGs are not included in the total CO2e calculation, therefore use of multiple sources is not impacting CO2e calculations. Once operations commence, this will be considered for annual recording & reporting going forward. Project Specific Emission Factors will be prepared once validated process data becomes available.
Xodus 51	Page 826: Emergency blowdown calculation The volume of gas released should be calculated using pipe volume and pressures.	Please refer to response #27.
Xodus 52	Page 827: "Note that venting estimates are not included in the overall estimates of the Development emissions, or annual average, as it is not possible to credibly estimate how often this may be required."	Please refer to response #29.

Reference	Request for information	Navitas response
	Recommended that assumptions are made for this and captured in worst case project emissions forecast.	
Xodus 53	Page 827: In Table 10.69 there is a mix of significant figures and data errors.	This has already been identified by Navitas. Statements explaining the rounding will be added to the revised Emissions Chapter.
Xodus 54	Page 831: "These show that the average carbon intensity estimates per annum, based upon the worst-case assumptions itemised in Table 10.63 above, range from 25.8 – 35.2 kgCO2/boe" Confirm how these carbon intensities have been calculated. From Figures 10-39 to 10-41 this seems low.	Total Worst Case life-of-field Emissions Intensity (kgCO2e/boe) = (Total emissions over life of field in tonnes CO2e x 1,000 to convert to kg) / (Total oil production in barrels for each production case). e.g. P50 average EI = (8,994,526 tCO2e * 1,000)/(306.9 MMbbl * 1,000,000) = 29.31 kgCO2e/boe. Navitas will add this as a footnote in EIS Section 10.9.4.5.4.
Xodus 55	Page 831: "Assuming the producing installation will be a 'lease and operate' FPSO, refitted between 11 - 25 years ago, the average P50 carbon intensity, and indeed all the carbon intensity estimates above, can be compared to the UK average carbon intensity of 39 kgCO2/boe (Section 10.9.4.3.2.3) indicating that the Development is comparatively efficient." Not equivalent comparison. The development should be treated as a new FPSO.	At the time of publishing the EIS, the 2023 NSTA Emissions Monitoring Report was most recent which stated carbon intensity (i.e. CO2 only) for Floating Installation 11-25 years = 39 kgCO2e/boe. NSTA Emissions Monitoring Report 2024: Emissions intensity of Floating Installation 0-10 Years = 20 kgCO2e/boe Emissions intensity of Floating Installation 11-25 Years = 36 kgCO2e/boe Note – NSTA averages reflect actual reported operational emissions intensity (Scope 1), whereas EIS presents worst case. Navitas shall update the post consultation EIS with the 2024 NSTA report. EIS Section 10.9.4.4.4 notes that currently expected emissions from Sea Lion are 18.24kgCO2e/boe. This section also notes that 'when the personnel transportation, drilling and vessel emissions are excluded to enable better like-for-like comparison with UKCS emissions reported to the NSTA, the carbon intensity is estimated to be 14.4 kgC02e/boe (section 10.9.4.5.4).' Consequently, Sea Lion current expected case carbon intensity benchmarks under the NSTA average for an FPSO of 0-10 years. This is

Reference	Request for information	Navitas response
		without the additional emissions reductions measures that will be considered in FEED and the ERAP.
Xodus 56	Page 829: Comparison with UKCS emissions Assumptions are not consistent with those from UKCS (e.g., EEMS is standard in UKCS for unknown emissions factors) and the scope of assessment is different. It is not correct to compare the averaged annual emissions for the development, it should be compared on an annual basis. We would expect EEMS to be used as standard if asset specific emissions factors are not available.	UKCS numbers used for the comparison represent an average of all fields which include production from fields at all phases of field life, so comparing to the SL total average number is not unreasonable and more representative than using just a single arbitrary year from SL. Reported UKCS emissions are actual operational emissions (Scope 1 only).
Xodus 57	Emissions spread-sheet: Cold venting uses the OGP emissions factors, with a value of 7 for methane given in Table 10.65. We suspect this is a typo and should be 0.7. However, we would be expecting EEMS to be used to be consistent with other emissions factors. We suspect methane has been overestimated in the current calculations by use of 7 tCH4 / t pollutant as the emissions factor, given in Table 10.65.	Navitas will work with FIG to determine the required methodology that will be adopted for emissions reporting. This will not be to OPRED via EEMS but Navitas consider it is likely to be aligned with GHG protocol/ISO 14064 standards.
Xodus 58	Page 833: Comparison with UK carbon budget This comparison is incorrect. We would recommend estimating emissions from the development for each relevant 5-year budget period and presenting as a percentage of the 5-year budget	Table 10.65, p822 we note that the decimal point is missing and it should be 0.7 for CH4, however the correct factor of 0.7 was used in calculation of vented gas in Table 10.69. We will consider use of alternative emissions factors in the future EIS update. These will be based on gas composition and not EEMS. In response to other comments, these (CH4 and VOC) have both been changed to 0.5 in the revised chapter and revised calcs.
Xodus 59	Page 837: Cumulative impact (Section 10.9.9) seems to solely consider other oil and gas activity. It is unclear why this is the case, as we would expect GHG emissions from all activities to contribute to cumulative impacts, making the assessment challenging. Setting this in the context of carbon budgets or net zero targets (for example) enables some consideration to be achieved but this comparison shouldn't be limited to oil and gas. We also noted that the source of NEFL and POEPL emissions numbers in Table 10.72 should be referenced	Navitas note this comment, and the post consultation EIS will be updated to reflect this.
Xodus 60	Page 838: "compare 'like-for-like' emissions data" A like-for-like comparison has not been carried out.	Navitas is not clear on the comment as the only reference to 'like-for-like' on page 838 is in Section 10.9.10 which is the confidence assessment.

Reference	Request for information	Navitas response
	The calculated emissions from the development should be presented in such a way that a direct comparison can be taken, such as defining scope 1, 2 and 3 emissions, instead of stating that they "may be over-represented". We would suggest a table outlining the scope 1, 2 and 3 emissions with inclusions and (where applicable) exclusions with justification.	This reference to 'like for like' is simply making the point that, where possible, comparisons were made using comparable GWPs etc. However, it is recognised that true like-for-like comparison is not possible as North Sea operators all use different boundaries, emissions factors and GWPs etc. What is presented is based on the best information available to provide the reader with a like-for-like comparison. Nonetheless, the reference will be removed to avoid confusion. As described in 10.9.4.3.1, historical GHG emissions from other sectors e.g. fishing, O&G, shipping, aviation and other industries in the region are not available within the Falkland Islands data set, and nor are projections available. Navitas understands that there are some fishing-related emissions included in the transport data provided by FIG, but these are broad estimates for emissions arising from fishing vessels operating in the zone, and do not represent emissions arising from fishing as an industry activity. The predicted O&G emissions data provided in Table 10.72 were taken from the previous EIS's submitted and these were used and itemised as the only data available. While Table 10.58 does provide a breakdown of historic Falkland Island emissions by sector (albeit without data from the above activities), these are of little value when considering the future Sea Lion project emissions. Data from Table 10.58 could be extrapolated but this is considered to add little value, and while the reported Falkland Islands emissions should go down as efficiencies improve, in reality they will go up when aviation, shipping etc. are included in the emissions calculations. Consequently, Navitas consider that given the shortcomings of the data, a sectoral comparison would be meaningless . The data in Table 10.72 will be referenced in the updated post consultation EIS.
Xodus 61	General: We would encourage inclusion of embodied carbon for construction and drilling, providing a full picture of the development	Embedded carbon emissions are not required under the FIG EIA guidance. Furthermore, OPRED and SAMS did not suggest this be considered in

Reference	Request for information	Navitas response
	emissions. As scope 2 and 3 emissions are already incorporated, including the end use of the product, we feel like embodied carbon should also be considered	their compliance review. Note Embedded carbon is a large, detailed piece of work and not commonly included in other UKCS emissions estimates for development EIS. e.g. Rosebank EIS does not include embedded emissions.
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Key:
DMR = Department of Mineral Resources
OPRED = Offshore Petroleum Regulator for Environment & Decommissioning
SAMS = SAM Enterprise
Xodus = Xodus Group
REDACTED

Appendix B: Responses to representations by FIG

Reference	Representation	FIG response
Falklands Conservation (1)	FC believes that Falkland Islands Government (FIG) has not made the promised progress in three key areas of environmental legislation that would help ensure that environmental impacts are minimised and would therefore help guide any Environmental Impact Statements to best practice standards. These were 'polluter pays', updated wildlife ordinance and 'environmental case' legislation. The lack of any identified key marine features such as Marine Protected Areas and Vulnerable Marine Ecosystems, and associated protective policy is a significant weakness for risk assessment, decision-making and protection of the marine environment.	The approach to existing EIA practices has been informed substantially by the work of the GAP initiative involving much stakeholder engagement and consultation, documented in ExCo Papers 154/16, 189/16 and 34-23. This included a review of EIA practices in five worldwide situations and recommendations for an environmental assessment methodology that have been adopted by Navitas in the current EIS. The FI remains committed to the 'polluter pays' principle as noted in its Environmental Charter. Since the recruitment of a biodiversity protection advisor in May 2022, work on wildlife law has developed including engagement of key stakeholders. Following the consultation on Marine Management Areas in 2022, policy work has been ongoing and the Section 7.5.2 of the EIS reflects the latest developments in this area. ExCo Paper 136/24 (July 2024) documents that drafting work is ongoing in the areas of Biodiversity/Wildlife Protection and Marine Managed Areas. The framework for new legislation, including the ALARP principle, has been discussed at some length and agreed via ExCo (e.g. papers 128/18, 177/18, 180/18).
Falklands Conservation (2)	There is risk that many new oil projects could become uneconomical before the intended project end-date. The lack of an early commitment to how decommissioning would happen in an environmentally sustainable manner is therefore a critical omission. If FIG gives a green light to this Environmental Impact Statement that does not meet best practice standards and before legislation is put in place, it makes the legal reliability of the agreement uncertain in case of any infringements and puts the	Oil and gas projects are planned and financed in the context of their industry i.e. knowledge that the oil price is inherently volatile compared to most other commodities. In the UK, the decommissioning programme is dealt with as a separate activity with its own environmental impact assessment. FIG is conscious of the liabilities associated with decommissioning and assurance around this issue is a very important consideration in operator discussions. FIG has had the Sea Lion proposals scrutinised by independent advisors and is putting in place new legislation based on the most modern standards to control production operations.

Reference	Representation	FIG response
	government at risk of being sued if trying to impose standards later.	
Falklands Conservation (3)	FIG should not sanction unnecessary environmental impacts caused by a corner cutting development proposal, under high-risk and inadequately legislated circumstances. Determining an EIS of this quality would be to endorse low standards and commitment that delivers a poor outcome for the environment and the community. The EIS should be re-submitted only once key gaps have been filled, errors addressed, and standards met.	The 28-day post-consultation period is provided for the developer to respond to all of the points made in the representations. DMR has critically reviewed their responses and is making a recommendation on the next steps. It has been normal practice for a further revision of the EIS to be produced that takes account of representations as far as possible.
Falklands Conservation (4)	Falkland Islands laws and policies are not 'oil-ready' FIG should have put in place rules before an Environmental Impact Statement. For good environmental protection and for Environmental Impact Assessments to work to the best standards, it is important to have a consolidated set of policies and laws to identify what elements of the environment should be protected strictly or to lesser degrees, and how projects can operate within the law. It is also important, so that if rules are infringed, reliable court challenges are possible. This is important for MLAs to know that they are making safe decisions when consenting projects – but also for potential investors in projects in order to see if their investments are safe. Before 2020, FIG recognised this and committed to updating standards in: • the Conservation of Wildlife and Nature Ordinance 1999 7 • establishing clear liability rules for polluters • introducing a form of technical environmental protection rules called 'environmental case'. Regrettably, none of these standards were completed before the Sea Lion Environmental Impact Statement was submitted. If MLAs give a green light to the Environmental Impact Statement	The sphere of environmental protection has been constantly evolving over several decades. Issues such as the thinning of the ozone layer - having a real effect in the Falkland Islands - have arisen and been addressed via international action (in that case, the banning of CFCs via the 1987 Montreal Protocol). No regime in the world is static, and developers and regulators must proceed in a dynamic way, understanding that new threats will emerge and require action. The UK Finch EIA case shows an evolution of procedural thinking, and the impacts of microplastics or 'forever chemicals' shows an evolution of scientific thinking. The Environmental Plan proposals for the Falkland Islands allow for regular, thorough review of the Plan against latest thinking, and provide for environmental monitoring relevant to each impact. This is a resilient and risk-based approach. There is considerable scientific understanding about sensitive habitats and species in the region regardless of whether sites are protected or not. Oil and gas projects have evolved in highly-regulated parts of the world and have well-established mitigation measures that mean impacts are well understood and controlled - often to undetectable levels of impact.

Reference	Representation	FIG response
	before legislation is put in place, it makes the legal reliability of the agreement uncertain in case of any infringements and puts the government at risk of being sued if trying to impose standards later. The lack of this environmental framework means that international standards, as would be found in jurisdictions such as the North Sea, would be unable to be adopted. For example, there is a lack of national habitat categorisation and prioritisation in Falkland Island waters (equivalent to EU Habitats Directive, OSPAR and other UK categorisations). This makes it difficult to attribute value and risk to different sites and therefore suitable mitigation proposed	
Falklands Conservation (5)	It is not clear why some have ticks for an Action Plan (AP) plan required and others don't. If they are identified as conservation concern, then logically all might need an AP. There is no AP currently adopted by FIG solely for dolphins, and the globally Endangered sei whale should certainly be a priority species requiring an AP. APs in the past have been for all cetacean species grouped together, and currently none are valid beyond 2018.	The list provided in the EIS is no longer current. It is part of the Environment Strategy 2021-2040 to develop necessary Species Action Plans and a sei whale Species Action Plan is under specific consideration.
Individual (1)	There will be significant carbon emissions as a result of the burning of oil produced. There is little commitment to offsetting these emissions. FIG have frequently pushed their environmental credentials and a desire for net zero but appear happy to contribute significant amounts of CO2 to the atmosphere without proper offsetting in place.	For significant impacts, the OMO requires that the EIS contains a description of the measures that are envisaged to eliminate or reduce; if possible, remedy; and offset those effects. Navitas has submitted a Carbon and Biodiversity Offsetting Fund Strategy that outlines their approach to offsetting of the impacts of greenhouse gas emissions, expanding on what is contained in the EIS. FIG is in further dialogue with Navitas on this issue.
Individual (2)	Going ahead with a huge oil development such as this appears at odds with FIGs commitments to net zero. Indeed it is likely to lead to the Falkland Islands having the highest CO2 emissions per head anywhere in the world (we cannot and should not wash our hands of the emissions created once the oil has been exported)	In terms of benchmarks, Navitas' calculations are that the FPSO (the largest emission source) would emit 14.4 kgCO2/boe which is lower than a comparable North Sea FPSO that had just been refitted. The OMO requires offsetting.

Reference	Representation	FIG response
Individual (3)	5. Incomplete Legal Framework for Environmental Governance: In addition to the concems above; the existing legal framework is insufficient to ensure effective environmental governance in the context of this project. Current regulations do not provide adequate safeguards or enforcement mechanisms to protect the environment from potential harm. Strengthening the legal framework is essential to ensure that environmental risks are properly managed and mitigated.	The legal framework in place via the Offshore Minerals Ordinance 1994 (as amended) has been followed many times for exploration and appraisal projects that have run satisfactorily from planning to completion. Many Environmental Impact Statements have been submitted within this framework, including for two production projects in 2018 and 2020, which are similar to the currently proposed project. There are opportunities to enhance the regulatory system in advance of production and planned primary legislation will be in place before that time, which is at least two years away.
Individual (4)	Is FIG sufficiently prepared with essential services - electricity, water, sewage, waste management and accommodation? I have not heard or read anything that gives me confidence that FIG is prepared. I also think sending ash/waste to landfill in UK, or anywhere else, is unacceptable, a facility should be built on the islands.	The topics raised are discussed in Chapters 10 and 11 of the EIS: Electricity, Ch.11.5; Water, Ch. 11.4; Sewage from vessels, Ch.10.7.1 and 10.7.2; Waste Management, Ch. 10.10. Onshore sewage is not specifically dealt with in the EIS. Proposals to design and build a new municipal incinerator are underway, which will significantly reduce volumes of waste going to landfill and which will operate to modern air quality standards. On landfill, FIG's Environmental Strategy Progress Report noted the commitment to creating, in partnership with BFSAI, a waste management facility and a new landfill designed and built to high specifications by 2025 to minimise environmental impact. Policy approval was given by ExCo in 2023 and work proceeds to secure this new waste management and landfill facility.
Individual (5)	Is Navitas Petroleum an ethical company? How do/did Navitas view/choose their investors for the Sea Lion/Rockhopper development? Israeli investors are eager for access to oil and gas assets. It would be abhorrent morally to humanity if the riches from our 'oil' filtered into weaponry and contributed to the genocide and wars in the Middle East. It would be more ethical if part of our fortune be put into resourcing and investing in technologies working for cleaner energy for that distant future when oil is no longer needed.	Navitas Petroleum, the owners of the licensee Navitas Petroleum Development and Production Ltd, publishes an annual Environmental and Social Governance Report, which is available on its website. As with any company operating in the Falkland Islands and registered in the UK, Navitas PDPL and its Directors will have to comply with the relevant company, civil and criminal law that applies to them in either jurisdiction.
Individual (6)	Global warming and climate change due to burning of fossil fuels is at last recognised as undisputable fact The International	The EIS is the latest stage in the logical and legal process resulting from decisions taken over several decades by the Falkland Islands Government, pursuant to

Reference	Representation	FIG response
	Energy Agency said in 2021 "If governments are serious about the climate crisis, there can be no new investments in oil, gas and coal, from now – from this year." I do not see how a responsible government can proceed with approving a new oil development at this stage in our planet's history.	democratic processes, to allow its offshore hydrocarbon reserves to be developed. The economy has already benefitted significantly from these endeavours. Future strategy was a consideration in the preparation of the Islands Plan 2022-2026 which states 'Progress extractive industries in an environmentally conscious way'. The world is in a transitional phase of global development where technologies are increasing to provide society with energy. Meanwhile, the Falkland Islands relies on the use of hydrocarbons for its economy and will do so for the foreseeable future. It is not inconsistent for the Islands to be a modest producer within the global hydrocarbon market.
Individual (7)	Notwithstanding the myriad of data gaps, inconsistencies and errors this document contains - as identified by a number of informed, professional parties and individuals - my comment here relates to the foolhardiness of opening up oil and gas fields in the Falklands. Our oil industry aspirations date back to the efforts of FIG civil servants in the early 1990s, when the role of the oil and gas industry in precipitating climate change and greenhouse gas emissions had not yet entered mainstream political consciousness, and certainly not that of the Falklands. 30 years on times have changed dramatically and it is now no longer seen to be politically or globally acceptable for a self-styled environmentally responsible country to be opening its doors to an industry that is widely acknowledged as the cause of human-induced environmental damage on a scale never seen before. To quote the statement from Falklands Conservation: "The International Energy Agency has stated that no new oil and gas fields should be opened if we are to achieve net zero emissions by 2050. This would be necessary to keep temperature	The Falkland Islands Government is committed, via democratic processes, to the Islands Plan 2022-2026 which states that the Falkland Islands will 'Progress extractive industries in an environmentally conscious way'. The EIS is legitimately brought under our licensing and environmental legislation in the form of the Offshore Minerals Ordinance 1994 (as amended) and its daughter legislation. The public consultation is under Section 64-67 of the Offshore Minerals Ordinance and it must be treated in those terms. The EIS discusses relevant environmental aspects and impacts and DMR welcomes the feedback on the EIS.

Reference	Representation	FIG response
	rises under the safe 2°C limit, avoiding far more severe climate change effects on wildlife, ecosystems and people, including for the Falkland Islands. Opening a new oil field in the Falkland Islands would not align with this..." No matter how robust (or otherwise) the EIS statements are regarding environmental and social impacts, risks and sensitivities, and associated proposed mitigation measures, they are of no relevance to the central issue which is we should not be part to the opening up of new oil and gas fields.	
Individual (8)	The Falkland Islands is not ready for hydrocarbons production. Oil Readiness has languished, and whilst MLAs have re-prioritised work in recent months, this has not resulted in demonstrable revisions to the legislation and regulation required to oversee a production industry. The Department of Mineral Resources is under resourced and this consultation itself demonstrates that: "The EIS consultation process and further detailed review can be managed with current staff through reprioritisation of other activities. Future resourcing requirements for the regulation of offshore hydrocarbons are addressed in other ExCo papers." FIG has failed to adequately prepare for this EIS submission and is currently not able to regulate a hydrocarbons industry to international best practice. This is a significant risk to the Falkland Islands environment and brings risk of contingent liability to the UK Government. Whilst "It is considered that this EIS will generally be compatible with future planned legislation", this legislation is not in place, and Navitas cannot be held to legislation that is not in force. This risks legal challenge and future lawsuits if attempting to ensure higher standards are adhered to later.	Oil readiness has gained significant momentum in the past 18 months, with a fully staffed local team, supplemented by external advisors in key areas. Legal drafting work proceeds as a high priority as documented in ExCo Paper 136/24P on legislative drafting priorities. It is expected that the drafting of the Environmental legislation to replace the Offshore Minerals Ordinance will be completed by the end of 2025 ready for approval by ExCo. The enactment of the legislation must then be coordinated with other amendments to the Offshore Minerals Ordinance. Nevertheless, the legislation is expected to be in force well before it is required for oil and gas operations. Regarding the evolution of environmental legislation, see answers above Falklands Conservation (1) Falklands Conservation (2) Falklands Conservation (4) Surfrider Argentina/ Fundación Patagonia Natural

Reference	Representation	FIG response
	10.2.1 of 118-24P states that the new environmental legislation will be in place by 2025 – this seems wholly unachievable when viewed against the FIG legislative program and the continued failure to move this project beyond policy and drafting instructions. Without robust environmental legislation in place for the EIA process and proposed Environment Case (policy approved in 2018), there are significant gaps in the current regulatory framework (e.g. lack of Polluter Pays and liability, identified gaps in the Conservation of Wildlife and Nature Ordinance) which have been highlighted for almost a decade. Commitments made by FIG to have best practice environmental and safety legislation in place prior to hydrocarbons development have not materialized.	
Individual (9)	The ExCo paper that sought approval for public consultation on the EIS contains errors and had the incorrect version of the EIS appended (incorrect CO2 emission figures) – the document approved by ExCo should be the document which is consulted upon – this failure to follow due process is concerning but consistent with FIG decision making in recent years.	The document approved by ExCo and the version consulted on had the same total project emissions figures in tables 10.66 and 10.67. The version consulted on had some additional figures on emissions from use of sold product and a correction to some UK emissions figures in section 10.9.4. These differences were not considered to require ExCo's further consideration prior to the public consultation going ahead. The Governor's view that the proposals require an EIS was clear.
Individual (10)	The EIS consultation process appears muddied, with the role of FIG as regulator and Navitas as developer unclear at times and occasionally appearing to carry direct conflicts of interest.	The statement talks about appearances. It is not possible to comment without further details.
Individual (11)	2.4 - Lack of stability in post-oil scenarios The Environmental Impact Statement (EIS) fails to address the critical issue of what will happen to the Falklands in a post-oil scenario or during periods of oil market instability. The EIS overlooks the potential long-term risks associated with becoming heavily reliant on the oil industry. History has shown that when regions or industries become dependent on oil, they are vulnerable to severe economic disruptions if oil reserves dwindle, if there are fluctuations in global oil prices, or if the industry declines for other reasons.	The market for oil is volatile relative to many other commodities, though products such as fish and wool also suffer from significant market changes over realistic investment periods. In 2012, a socio-economic study by Plexus acknowledged this by saying "The economy is narrowly concentrated on three sectors (i.e., fisheries, agriculture and tourism), which are highly volatile and vulnerable to external shocks from the global commodity markets". These industries also bring substantial economic benefits that directly contribute to the standard of living, the Falkland Islands operates a financial reserve which buffers annual fluctuations. The idea of a Sovereign Wealth Fund has previously been discussed. The Islands have experience in understanding and managing the impact of oil business through previous oil exploration campaigns, which have brought temporary increases in

Reference	Representation	FIG response
	A downturn in the oil market can lead to widespread job cuts, leaving many people unemployed and leading to a range of social issues, including increased homelessness and poverty as has been seen in Aberdeen and other cities which developed an oil reliance. Businesses that thrive during the oil boom may struggle or close down entirely when the industry contracts, resulting in a loss of economic diversity and resilience. Additionally, infrastructure investments made to support the oil industry may become underutilised or abandoned, leading to a deterioration of public assets and a further strain on government resources. The domino effect of an economic downturn in a post-oil scenario can be devastating, with negative impacts spreading across various sectors and deeply affecting the community's quality of life. The EIS does not adequately consider these risks or propose strategies for mitigating them. While it may be challenging to fully predict and plan for a post-oil future, it is essential that the government takes a cautious and forward-looking approach, ensuring that the Falklands is not left vulnerable to the boom-and-bust cycles often associated with oil dependency. The potential consequences are too significant to ignore, and a more robust plan is necessary to ensure long-term stability and sustainability for the Falklands	economic activity and employment. Other examples such as the Shetland Islands provide models for how island communities can best deal with oil investment. The socio-economic impacts of oil and gas investment have been examined e.g. in the 2019 report by the Policy and Economic Development Directorate and discussed at ExCo (Paper 141/19P).
Individual (12)	3.1 - Global perceptions of the Falklands The Falkland Islands have long marketed themselves as a place where "nature is still in charge." This branding is not just about attracting tourists who come to experience the unique wildlife, including penguins, seals, and whales, but also plays a crucial role in the Islands' political narrative on the global stage. The Falklands are presented as responsible custodians of this part of the South Atlantic, committed to preserving the natural environment for future generations.	The Falkland Islands has had an oil and gas industry for many years and this has undertaken business to high standards of environmental protection. The oil companies have left a legacy of research and data gathering that has significantly increased knowledge of the marine environment. Other countries, such as the UK, have substantial offshore oil industries alongside successful tourism. The Plexus socio-economic study in 2012 reported that "The potential for collateral damage to the non-oil sectors is seen as low. Through the exploration phase the agriculture, tourism and fisheries sectors have continued to thrive."

Reference	Representation	FIG response
	This image is integral to the Islands' efforts to garner international support for self-determination, particularly during engagements with the United Nations and other global bodies. By positioning the Falklands as a region that prioritises environmental stewardship, legislators have successfully leveraged this perception to build political alliances and strengthen the case for maintaining autonomy. However, the development of oil and the associated environmental risks could seriously undermine this carefully cultivated image. The global perception of the Falkland Islands as a pristine, environmentally conscious region is at risk of being tarnished by the realities of oil extraction and the environmental impacts that accompany such activities. If the project proceeds without adequately addressing these concerns, it could damage the Falklands' reputation, leading to a loss of credibility in both tourism markets and international political arenas. Moreover, any negative environmental outcomes could diminish the appeal of the Falklands to eco-conscious travellers, which would have direct economic consequences. This would not only affect the tourism sector but also weaken the Islands' ability to use their environmental record as a tool in political diplomacy. It is essential that these potential impacts on global perception are given serious consideration in the Environmental Impact Statement, as they could have long-lasting effects on the Falklands' economic and political standing.	
Individual (13)	3.2 - Public infrastructure support and wider functionality The development of the oil industry in the Falklands is likely to introduce significant challenges to the functionality of the Falklands government, particularly in terms of public infrastructure support. One key concern is the increased use of the air bridge between the Falklands and the UK. With oil-related activities increasing demand for air travel, there will likely be	The EIS considers the potential impacts on air travel in Section 11.6 and there is a commitment to provision of a dedicated charter flight, as was provided in the last exploration wells campaign. Previously, spare seats on the oil charter flights were open for non-oil personnel and this was seen as a positive effect that increased capacity rather than decreasing it. The EIS considers impacts on the road network in Section 11.7 and on other

Reference	Representation	FIG response
	longer delays for government officers travelling to and from the Falklands. These delays could hinder the efficiency of government operations, reducing the ability of officers to respond promptly to critical issues. Moreover, the longer and less reliable travel times may deter potential recruits from moving to the Falklands, as well as dissuading current residents from staying, exacerbating the challenges of maintaining a skilled and stable workforce within the government. In addition to the strain on travel infrastructure, the oil industry will place an additional burden on the Falklands' already strained public works sector. The increased use of roads for transporting oil-related materials and personnel will accelerate the wear and tear on the road network. Given that the road works team within public works is already operating at maximum capacity, this added pressure will likely lead to delays in essential road maintenance and other public works projects. The ripple effect of these delays could extend to other critical infrastructure as previously mentioned, such as electricity, water access, fuel and bunkering, housing, and healthcare services, all of which are already facing capacity challenges. The EIS does not fully address these potential impacts, which could severely compromise the government's ability to maintain and develop the infrastructure necessary to support both the oil industry and the wider community.	public amenities throughout Section 11. In areas such as waste, the project would contribute income to the new incinerator project being constructed by FIG. Clearly the project would contribute significant funds to the public purse and this would give FIG more freedom to make infrastructure decisions.
Individual (14)	4) Method of consultation of EIS I would also like to make known my significant concern in regards to the Non-Technical Summary and the presentation of this document. While I understand the necessity of simplifying information to increase likelihood of responses by members of the public, I feel that the document overly condenses and simplifies various areas	The EIS public consultation process allows any member of the public to raise their views and have them considered by the government. The provision of a Non-Technical Summary as a legal requirement allows the main points of the EIS to be communicated without requiring the digestion of the much larger EIS, and of course individuals are at liberty to read further into any topics that are of particular interest to them. Meanwhile, the EIS is necessarily a substantial document given the amount of material necessary to make competent arguments in often complex fields of science and engineering.

Reference	Representation	FIG response
	and at times even downplays areas of significant risk with the possibility of misleading stakeholders and members of the public who may not have time to read the large complete EIS. While there is little specific response that can be made in regard to this, I would urge that legislators and officers thoroughly consider the high barrier for complete responses which exists for members of the public in regard to the EIS, as almost all but those who would have professional capacity and reason to read the complete EIS; or those who have no significant professional or personal time commitments, would have time to review and respond to the complete EIS. This being the case, I would urge that Legislators in particular consider the views of their electorate when considering the EIS and it's responses - and do their best to imagine the views of the electorate who may be effected in the future by the decision to pursue hydrocarbons, and would not have had the opportunity to respond to this document, either due to capacity, age, commitment, or fear of negative consequences from their employer or future prospective employers - especially due to the heavily politicised view which is taken of anti-oil stanced individuals.	
Individual (15)	5) Acceptability of risk While I do not claim to have expertise in environmental science, biology, or related fields, I am deeply concerned about the lack of attention given to what is considered an acceptable level of risk by the government. The Falkland Islands have long been promoted as a place where nature is in charge, a region that values environmental stewardship and care for its unique ecosystems. Given this, I strongly believe that the burden of what is deemed an acceptable level of environmental risk should be extremely low.	The risk assessment methodology is almost identical to that developed via the GAP Project and put to ExCo in 2023 (Paper 34/23P). This was developed with Falkland Islands stakeholders, taking into account practices in other parts of the world as well as latest scientific understanding. Impacts or risks that are assessed as Moderate, Upper Moderate or High are deemed significant and are therefore subject to tests of elimination, reduction or remedy, and offsetting. Such impacts or risks will certainly form part of the future regulation of operations within the Environmental Plan.

Reference	Representation	FIG response
	The EIS, however, proposes risk levels that range from moderate to high, which are simply not acceptable by any reasonable standard for a place that prides itself on environmental preservation. These mixed moderate, upper moderate, and high-risk assessments should not be allowed to progress unchecked. It is vital that the government upholds the principles of environmental care that have long been associated with the Falklands. Allowing such significant risks to move forward would not only undermine these values but could also lead to irreversible harm to the very environment that the Falklands has committed to protecting.	
Individual (16)	Conclusion In conclusion, I believe that the proposed oil drilling project is ill advised from a social perspective, environmental perspective, and from the perspective of the functionality of government. I also believe that it would be completely misaligned with the Falklands Government goals and responsibility of the Falklands Government and people to contribute to the global environment and - as the Islands Plan states: "reduce our carbon emissions in order to ensure we act as a responsible global citizen."	FIG has a goal to 'Progress extractive industries in an environmentally conscious way', and the goals around carbon emissions are also noted. The regulation of hydrocarbon activities is extremely important and is reflected in the effort and expertise being invested in oil readiness in the Falkland Islands regulatory regime.
Individual (17)	And finally, I would like to express a significant concern regarding the Falkland Islands preparedness for potential accidents related to oil exploration. The remoteness of the Falkland Islands, coupled with their limited resources, raises serious doubts about the ability to mount a prompt and adequate response in the event of an environmental incident.	The proposals for preventing and responding to potential accidents, especially significant oil releases, are outlined in the EIS and described in more detail in Oil Pollution Emergency Plans (OPEPs) which have been submitted by Navitas and are carefully regulated by DMR. In addition to DMR these receive detailed review by FIMA and OPRED in the UK. The remoteness of the Falkland Islands is a key consideration in planning for incidents and contingency plans must take such factors into account, such as being able to mobilise equipment reliably give the distances and logistics issues involved.
Individual (18)	The EIS is inconsistent with FIGs objective to 'reduce our carbon emissions, in order to ensure we act as a responsible global citizen' (Islands Plan 2022). FIG cannot continue to state that the environment is of great value and importance whilst taking actions that directly conflict with these statements. A	The OMO provides for environmental impact assessment of such projects.

Reference	Representation	FIG response
	hydrocarbons industry would be good for the economy, not the environment, it is that simple.	
Individual (19)	The EIS is largely based on the previous Premier submissions, but with amendments to the development to cut costs (e.g. smaller repurposed FPSO and direct offtake to tankers of opportunity brings greater spill risks –FIG is currently not in a position to adequately control or regulate this oil spill risk).	FIG manages oil spill risks via the National Oil Spill Contingency Plan last revised in 2022 and this operates in communication with Oil Pollution Emergency Plans put forward by the developer, which undergo careful examination by DMR, FIMA and UK government. The Offshore Minerals Ordinance requires substantial insurances to be in place for oil spill compensation and DMR also requires operators to have in place insurance to cover their own costs of responding to a worst-case incident. The Falkland Islands is also a participant in three international oil spill liability funds which provide compensation from tanker accidents.
Individual (20)	If the EIS is to be accepted, then conditions should be applied including consultation on proposal for environmental monitoring plans, offsetting, oil spill plans. Ultimately, the Falklands is not oil ready and whilst there may be substantial economic gain on the horizon, is it worth the risk if we can't prevent our national resources and environment? It is laudable to be aiming at international best practice, but we aren't there, and we don't have the resources to get there any time soon.	Currently DMR does not have plans to consult on the Environmental Plan component of the offshore legislation, though this is still to be finalised. The EIS is a key public document and the way it is currently implemented has a high degree of visibility and engagement. It might be counter-productive to then have a similar exercise for an Environmental Plan or oil pollution emergency plans which could be construed by the public to be another request to comment on the wider project. Further, these plans are intended for use by professionals and would contain more technical information than might normally be set out to the public. Obviously DMR would require the Environmental Plan and other post-EIS documents to be of the required quality.
Surfrider Argentina/ Fundación Patagonia Natural	**REDACTED**	**REDACTED**
Surfrider Argentina/ Fundación Patagonia Natural	The International Energy Agency has stated that no new oil and gas fields should be opened if we are to achieve net zero emissions by 2050. This would be necessary to keep temperature rises under the safe 2°C limit. Opening a new oil field in the Malvinas Islands would not align with this, therefore Surfrider Argentina rejects this decision emphatically.	This is a question of international policy on climate change.
RSPB (1)	5) FIG's planned environment regulation regime is incomplete and therefore not yet 'oil-ready' a) FIG has recognised the need	See responses to Falklands Conservation (4) and Individual (3)

Reference	Representation	FIG response
	to improve regulation for the environment in order to secure safe standards of environmental governance and to address potential conflicts of interest as would be found in other jurisdictions such as the UK	
RSPB (2)	b) In 2013 ExCo approved plans to separate the environmental regulatory function from the licencing function to avoid any potential conflicts (ExCo paper No. 70/13). This function is separate in the UK's North Sea regime. Whilst there is currently no evidence of any real conflict arising between licensing and safety regulation there are potential conflicts of interest between these functions, and most modern oil regimes separate the regulation of licensing/production from the regulation of safety and environmental matters (indeed in other regimes separation of these functions has followed major safety incidents (Piper Alpha in the UK and Macondo in the USA)). […] The Islands would be wise to learn from this experience and avoid some of the mistakes made elsewhere. This will ensure that the inherent conflict of interest between issuing economically and commercially valuable production licences and the approval of safety and environmental practices is avoided, and will better ensure the protection of the unique environment of the Islands and the safety of its inhabitants and transient workforces.	Within its minerals team, DMR has provided separate roles to advise on environmental, safety and licensing functions operating to the civil service code of conduct. DMR also takes external advice from independent advisors and UK government regulators. The future structure of regulation was agreed by ExCo in 2018 (Paper 177/18P) and the importance of the separation of environmental and safety functions from licensing was clearly stated and agreed. DMR is committed to taking forward this model in ongoing dialogue with ExCo.
RSPB (3)	c) This recommendation has not been completed. The licencing authority is now considering the approval of the EIS. Arguably the licencing authority is now faced with this potential conflict.	The review of the EIS will be put before ExCo in an entirely separate submission to any consideration of approval of the development from a licensing perspective. In addition to DMR's internal processes, reviews of the EIS have been obtained from experienced consultants and from the UK regulator, who are both independent of licensing or commercial considerations.
RSPB (4)	d) In the same paper there was the following commitment: That ExCo confirm that new legislation and guidance is needed to compel operators to submit an 'Environmental Case'. This recommendation has not been completed.	The recommendation to bring in a requirement for an Environmental Case prevails, and legislative drafting work is well underway on the new requirements, which have been widely consulted on. The legislation will be in place well before any operations take place relating to this EIS.
RSPB (5)	e) In 2020 ExCo paper 97/20 noted The wider Falklands environmental regulatory framework has been noted as a concern for the UK Government in relation to the offshore Sea Lion	FIG recognises the great importance of its environment for wildlife. Marine mammals are already given protection under the Marine Mammals Ordinance 1992 where it is an offence intentionally to take, wound, or kill any marine

Reference	Representation	FIG response
	development; and there is a need to demonstrate substantial progress regarding a number of items of legislation including the CWNO [Conservation of Wildlife and Nature Ordinance] in advance of project sanction. […] The FI wildlife legislation is dated and inappropriate for the globally significant wildlife supported by the Islands and includes little guidance for dealing with breaches. As the EIS correctly points out there are no equivalent 'Disturbance licences', so it is difficult for developers to know what the next steps are to be compliant with legislation and policy.	mammal in Falkland Islands waters. Drafting of new legislation for Marine Managed Areas is a high priority (ExCo 136/24). In the UK, 'disturbance licences' are rare and apply to situations where wild animals of a European Protected Species are affected in such a way as to impair the ability to survive, to breed or reproduce, or to rear or nurture their young; impair the ability to hibernate or migrate; or affect significantly their local distribution or abundances. It does not refer to situations where the behaviour of individuals is 'disturbed' such as by a passing vessel or small-scale spatial impacts. DMR notes that Navitas plans to reduce speeds of vessels to 8 knots when within the proposed Inshore Marine Managed Area that includes Berkeley Sound and its approaches, which are known to contain high densities of whales, and a programme of observers is planned to monitor impacts and enhance datasets. The new legislation being drafted for oil and gas operations includes a requirement for impacts to be reduced to ALARP and an acceptable level, and these controls - and the offences for breaching them - will apply to the impacts on wildlife identified in the EIS.
RSPB (6)	f) In 2017 ExCo approved plans (ExCo paper 5/17) to put in place a 'polluter pays' law: The proposed legislation seeks to extend the focus of those onto prevention as well as remediation by placing an obligation on operators to take necessary steps to prevent environmental damage, and giving FIG suitable powers to issue specific directions. This is in line with the UK Environmental Damage (Prevention and Remediation) Regulations 20157 . This recommendation has not been completed.	The Offshore Minerals Ordinance Schedule 1 already holds operators liable for any damage to the environment. New provisions are being drafted that will reflect the provisions in the UK for liability for preventing and restoring environmental damage improving the existing provisions in the Offshore Minerals Ordinance.
RSPB (7)	g) If FIG logic is to be followed, the environmental governance framework is not yet sufficiently complete to approve the current EIS to a sufficiently safe governance standard.	The current framework for environmental impact assessment has been tried and tested. Future operations will be managed according to the regime currently being drafted which will give a high degree of environmental protection.
Uplift	**Other international legal obligations** 27. The UK must report its emissions, plus those Crown Dependence and Overseas Territories which have had the UK ratification of the UNFCCC extended to them, under the UNFCCC process. The UK has extended its ratification of the UNFCCC to the Falkland Islands9. While the Paris Agreement has not been extended to the Falkland Islands, it is clear that	It is the FI's decision alone whether or not to participate in international treaties or conventions to which the UK is a party. The FI participates in the UNFCCC that including commitments on greenhouse gas emissions and is not party to the Paris Agreement that introduces nationally determined contributions (NDCs) amongst other measures. FIG's potential participation in any international agreement would require policy and regulatory impact work, and the effect on planned, actual or potential hydrocarbon activities would be taken into account along with other

Reference	Representation	FIG response
	Navitas consider it to be relevant legislation, and the UK may consider extending the Paris Agreement to other Overseas Territories. The UK is already not on track to meet its Nationally Determined Contribution and will need to put forward additional plans for reduction emissions if this was to be extended to the Falkland Islands and the Sea Lion project is approved. 28. The UK's status as a party to the UN Convention on the Law of the Sea (UNCLOS)10 extends to the Falkland Islands. UNCLOS includes obligations to adopt laws and regulations to prevent, reduce, and control pollution of the marine environment from land-based sources and from the atmosphere. Measures must include "those designed to minimize to the fullest possible extent" the "release of toxic, harmful or noxious substances from land-based sources" and pollution from vessels or installations at sea (UNCLOS, Article 194). 29. Article 194 of UNCLOS requires states to take "all necessary measures" to prevent, reduce and control pollution of the marine environment from "any source". The recent unanimous Advisory Opinion of ITLOS confirms that anthropogenic GHG emissions constitute pollution of the marine environment and that the obligation to take all necessary measures applies to such pollution (ITLOS Advisory Opinion, paragraph 197). 30. The ITLOS Advisory Opinion makes clear that the obligations under UNCLOS are not satisfied by simply complying with the obligations and commitments of the Paris Agreement (ITLOS Advisory Opinion, paragraph 223). Rather, it seems that "all necessary measures" requires, at the very least and only as a minimum, compliance with those emissions reductions obligations. 31. We recommend that the Department of Mineral Resources should aim to go beyond the bare minimum compliance with its obligations under the legislation and its regulatory regime if it hopes to comply with its obligations under UNCLOS. It is clear	environmental, social and economic factors. Given the Falkland Islands' status as a self-governing Overseas Territory of the UK and the importance of the subject and its international nature, it is relevant that the EIS should bring to readers' attention international agreements such as this. UNCLOS has been extended to FI, this acknowledges that states have the sovereign right to exploit their natural resources pursuant to their environmental policies and in accordance with their duty to protect and preserve the marine environment. FIG is aware of The International Tribunal for the Law of the Sea (ITLOS)'s response to a Request For An Advisory Opinion submitted by the Commission of Small Islands States on climate change and international law dated May 2024 which speaks to various aspects of atmospheric emissions. The Offshore Minerals Ordinance, via the EIS process, identifies measures to prevent, reduce and control the impacts of offshore hydrocarbon development, and our policies clearly set out the pattern of future legislation to control operational emissions. FIG's Environment Plan 2021-2040 sets out action on climate change and the Islands Plan 2022-2026 commits the Falkland Islands to meet our international obligations and have a plan for net zero.

Reference	Representation	FIG response
	following the ITLOS advisory opinion that states and signatories must take very significant action to prevent pollution from any source, including greenhouse gas emissions, to comply with their UNCLOS obligations.	