

Clean Seabed:
Considering Technology in decision making

25<sup>th</sup> November 2025

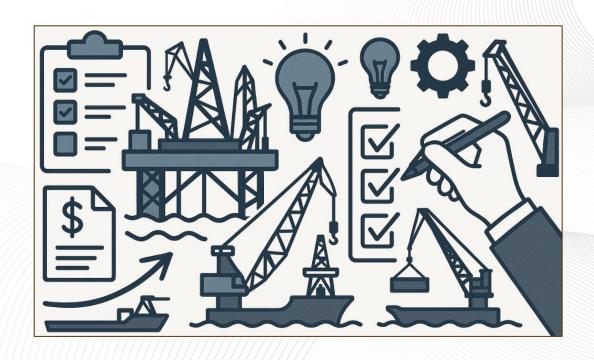


### Clean Seabed: Possible, Feasible, Available?

You put it there so take it out!







It always seems impossible until it's done!



## "Feasible" requires more than "Possible"

### **IMO:** "Technical and Practical Feasibility":

 "Engineering capabilities, practical limitations, characteristics of the structure, oceanographic considerations"

### **OSPAR Treaty:**

 General Obligation on Contracting Parties to apply Best Available Techniques (BAT), Precautionary and Polluter Pays principles

#### **PRINCIPLES**

The OSPAR Commission works under the umbrella of customary international law as codified by the 1982 Law United Nations Convention on the Law of the Seas (UNCLOS), especially in Part XII and Article 197 on the global and regional cooperation for the protection and preservation of the marine environment. The OSPAR Convention recognises the jurisdictional rights of states over the seas and the freedom of the High Seas, and, within this framework, the application of main principles of international environmental policy to prevent and eliminate marine poliution and to achieve sustainable management of the maritime area. This includes principles resulting from the 1972. Stockholm United Nations Conference on the Human Environment and of the 1992 Rio de Janeiro United Nations Conference on the Environment and Development, including the 1992 Convention on Biological Diversity.

Overall, the work of the OSPAR Commission is guided by the ecosystem approach to an integrated management of human activities in the marine environment. This is supported by a general obligation of Contracting Parties to apply

- The precautionary principle;
- The polluter pays principle
- Best available techniques (BAT) and best environmental practice (BEP), including clean



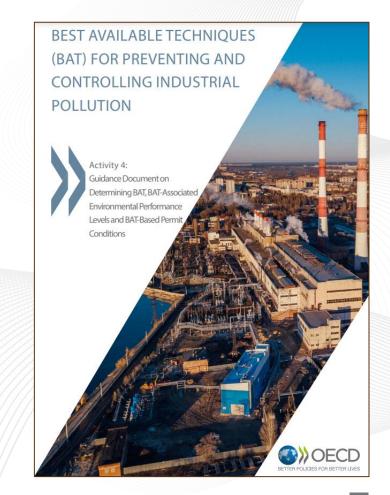
OSPAR Principles: Precautionary, Polluter Pays and BAT



# What are "Best Available Techniques"?

- "Best"; the most effective and advanced stage of development of activities and methods of operation which indicate the practical suitability
- "Available"; developed on a scale that allows implementation under economically and technically viable conditions

**BAT** is not a "Clean seabed at and cost" doctrine





### Incentives to advance Technology

- "No incentives to progress technology" a common myth
- ~\$100Bn global offshore decommissioning spend between 2025 and 2034 provides incentive
- Benefits not decommissioing unique; common to deepwater development and offshore renewables
- Examples:
  - Single lift
  - Perforate and Wash Cement
  - Diamond Wire Cutting
  - Eliminated manned diving operations
    - Dynamic positioning and crane heave compensation

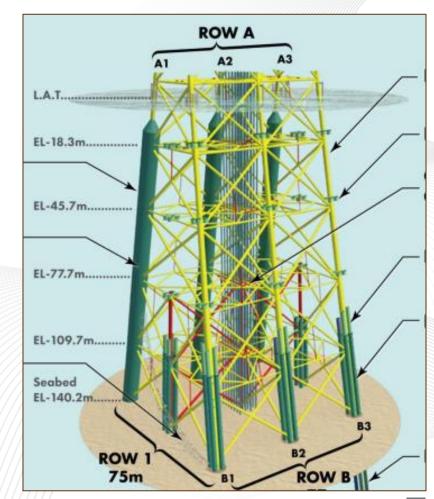




## Possible or Feasible? (Steel Jacket)

"Feasibility" is more than "its possible so do it":

- 1. Removing 5000-tonne footings requires 2500 tonnes of fuel (100 tonnes/day)
- 2. £50M cost to recover scrap steel worth £2M
- 3. More than 50% of cost from part recovery of revenue taxes
- 4. Overseas sourced; limited UK based supply chain





### No silver bullets

### Even if its possible:

- Ask "Why?", not just "how?"
- Benefits proportionate to the cost and environmental footprint
- "Technology" silver bullets are unlikely





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