



Bilag 2

Consultation letter Consultation of affected countries Hejre to South Arne development project.

Office/department
Center for geoenergy and
storage

Date
20-05-2026

J no. 2025-16966

/mklh

On February 21st 2023, Denmark in accordance with article 3 of the Espoo convention notified the Netherlands, Norway, Sweden, the UK and Germany that an Environmental Impact Assessment (“EIA”) procedure for the Hejre to South Arne development project would be completed.

INEOS E&P A/S (“INEOS”) is responsible for the project.

It was requested of the countries to inform whether they had intention of participating in the EIA procedure, and if so, submit any comments in relation to transboundary impacts on their territory and submit any potential comments received from their national public.

Germany and Sweden regarded themselves as affected parties and wished to participate in the EIA procedure. Norway did not wish to participate, while the Netherlands and the UK did not respond to the notification.

After a completed Espoo consultation in September-November 2023, on 26 April 2024 the Danish Energy Agency (“DEA”) approved the Hejre to South Arne development project. On 11 November 2025, however, the Danish Energy Board of Appeal annulled the approval from 26 April 2024 of the Hejre to South Arne development project and remitted the case for reconsideration

As a result, INEOS updated the material, and in accordance with Section 38 of the Danish Environmental Impact Assessment Act, the updated Espoo material has been in a renewed public consultation in Sweden and Germany from 30 January 2026 till 2 March 2026.

The DEA received comments from Sweden and Germany. Sweden responded that they did not have any comments. Germany submitted comments and DEA submitted a reply to the relevant authority in Germany. Germany did not respond to the reply from DEA.

Danish Energy Agency

Carsten Niebuhrs Gade 43
1577 København V

T: +45 3392 6700
E: ens@ens.dk

www.ens.dk



On 11 May 2026, the Danish Agency for Green Transition and Aquatic Environment in accordance with Section 38 (1) of the Danish Environmental Impact Assessment Act, gave consent for the DEA to issue a permit the Hejre to South Arne development project.

In the following, the German replies and the DEA comments are summarized. The comments from the DEA are marked in italics.

Federal Agency for Nature Conservation:

Due to the considerable distance of approximately 30 km (South Arne platform) and 50 km (Hejre platform) to the FFH site nature reserve “Doggerbank” or to the German EEZ of the North Sea, transboundary impacts from normal operations within the meaning of Section 44 (1) Sentence 1 and 2 as well as Section 5 (1) No. 2 NSGDgbV can be excluded.

However, where large-scale seismic activities or other work that emit impulse sound takes place in parallel, e.g. if it becomes necessary to ram conductors or platforms, borehole seismics, etc., these impacts would have to be assessed separately.

Potential transboundary impacts may arise in the event of accidents (blowouts), in particular through the release of oil.

In the opinion of the Federal Agency for Nature Conservation (BfN), the preventive and technical measures against leakages and unplanned releases—particularly of oil—set out in Section 6 of the Espoo Report should be imposed as binding conditions in order to avoid, or at least minimise, significant adverse effects within the “Dogger Bank” nature reserve in the event of damage. This applies in particular to the use of a blowout preventer (BOP) (see also OSPAR Guideline 2010/18).

In the event of an accident, the German Central Command for Maritime Emergencies (Havariekommando) as well as the Landesamt für Bergbau, Energie und Geologie (LBEG) should be notified and consulted.

The Danish Energy Agency:

The Danish Energy Agency emphasizes that any approval of the proposed project is conditional upon the project being carried out as described in the application documents and in the information submitted by INEOS. This includes, in particular, the use of a blowout preventer (BOP) during drilling operations.

In the event of an incident, such as an uncontrolled release of oil, the competent German authorities, will be contacted in accordance with the procedures and information provided by INEOS.