



# Morven North Offshore Wind Array Project

Environmental Impact Assessment Report

**Volume 4, Annex 1: Environmental Management  
Plan (EMP) (Version 1)**

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## Glossary

Term	Meaning
Acoustic Deterrent Device (ADD)	A tool deployed to emit high-frequency sounds to deter marine mammals from areas where their presence may pose a risk, such as construction sites or fishing operations.
The Applicant	Morven Offshore Wind Limited; the entity making the consent applications.
Designed-in measures	<p>Either primary or tertiary mitigation measures, which are considered inherent to the project's design. Includes:</p> <ul style="list-style-type: none"> <li>• Measures included as part of the project design;</li> <li>• Industry standard measures committed to by the Applicant (including post-consent management plans);</li> <li>• Measures required to meet legislative requirements.</li> </ul>
EIA Regulations	The term used to refer collectively to The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and The Marine Works (Environmental Impact Assessment) Regulations 2007.
Environmental Impact Assessment (EIA)	Assessment of the potential likely significant effects of Morven North on the physical, biological, and human environment during construction, Operations and Maintenance (O&M) and decommissioning.
High Voltage Alternating Current (HVAC)	High voltage alternating current (HVAC) is the transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current (HVDC) is the transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
Inter-array cables	Cables connecting wind turbines to each other and to Offshore Substation Platforms.
Interconnector cables	Cables connecting Offshore Substation Platforms to each other.
Invasive species	An introduced organism that becomes overpopulated and negatively alters its new environment.
Marine Directorate Licensing Operations Team (MD-LOT)	The part of the Scottish Government's Marine Directorate responsible for assessing and administering applications for marine licences and Section 36 consent (offshore) in Scotland.

Term	Meaning
Mean High Water Spring (MHWS)	The most inshore level location reached by the sea at high tide during mean high water spring tide. This is defined as the average throughout the year, of two successive high waters, during a 24-hour period in each month when the range of the tide is at its greatest.
Mean Low Water Springs (MLWS)	The average height of the low water levels of each pair of successive low waters during the periods of about 24 hours when the tidal range is at its greatest.
Morven North Boundary	Boundary within which the wind turbines and foundations, Offshore Substation Platforms and foundations, inter-array cables and interconnector cables and associated infrastructure for Morven North will be located.
Morven South Boundary	Boundary within which the wind turbines and foundations, Offshore Substation Platform and foundations, inter-array cables and interconnector cables and associated infrastructure for Morven South will be located.
Morven North Offshore Wind Array Project (hereafter "Morven North")	The Morven North Offshore Wind Array Project, which includes the wind turbines and foundations, Offshore Substation Platforms and foundations, inter-array and interconnector cables and associated infrastructure located within the Morven North Boundary. Consent for the export cables for Morven North will be sought separately.
Morven Offshore Wind Limited	Morven Offshore Wind Limited, a joint venture between JERA Nex bp (JNbp), together with German partners Energie Baden-Württemberg AG (EnBW), ("the Applicant").
The Morven Option Lease Agreement Site (hereafter, "Morven Site").	The 859km <sup>2</sup> area awarded to JNbp and EnBW's "Morven" project, identified as a result of the ScotWind leasing round and located in Plan Option (PO) area E1. Morven North and Morven South are two distinct projects, located with the Morven Site.
Morven South Offshore Wind Array Project (hereafter "Morven South")	The Morven South Offshore Wind Array Project, which includes the wind turbines and foundations, Offshore Substation Platform and foundations, inter-array and interconnector cables and associated infrastructure located within the Morven South Boundary. Consent for the export cables for Morven South will be sought separately.
Offshore Substation Platform (OSP)	<p>OSPs comprise the support structure, topside and electrical components used for collecting the electricity generated by the wind turbine generators. These OSPs can be divided into two types:</p> <ul style="list-style-type: none"> <li>• HVAC (High Voltage Alternating Current) collector substations;</li> <li>• HVDC (High Voltage Direct Current) converter substations.</li> </ul>

Term	Meaning
Operation and Maintenance (O&M)	The phase of Morven North and Morven South following completion of construction. Routine maintenance activities may include inspections, removal of marine growth build up, minor repairs, cleaning activities, and the replacement of consumables and corrosion protection systems. Non-routine major maintenance activities may include but is not limited to component exchanges and replacement of infrastructure and equipment (e.g. wind turbine blades, gearboxes and interconnector and inter-array cables), scour protection and cable protection replenishment or replacement, cable reburial and cable repair activities, painting and other coating works, replacement of access ladders, and geophysical surveys.
Scottish Ministers	The ultimate decision makers with regard to marine licence and Section 36 consent applications in Scotland.
Scour protection	Measures to prevent loss of seabed sediment around any structure placed in or on the seabed (e.g. by use of protective aprons, mattresses, rock and gravel placement).
Section 36 Consent	Under the Electricity Act 1989, a Section 36 Consent is required for the construction and operation of an energy generation station of capacity greater than 50 MW where it is located between 12 nm and 200 nm off the Scottish coast.
Unexploded Ordnance (UXO)	Explosive weapons that did not explode when they were deployed and still pose a risk of detonation.
Wind Turbine	A machine that converts kinetic energy from the wind into electricity comprising the following main parts: nacelle, hub, blades, tower and drivetrain.

## Acronyms

Acronym	Meaning
ADD	Acoustic Deterrent Device
CFLO	Company Fisheries Liaison Officer
CMS	Construction Method Statement
DP	Decommissioning Programme
DSLPL	Development Specification and Layout Plan

Acronym	Meaning
EnvCoW	Environmental Clerk of Works
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EnBW	Energie Baden-Württemberg AG
EOD	Explosive Ordnance Disposal
ERCoP	Emergency Response and Cooperation Plan
FIR <sup>2</sup>	Fishing Industry Representatives
FMMCP	Fisheries Mitigation, Monitoring and Communication Plan
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IEMA	Institute of Environmental Management and Assessment
INNS	Invasive Non-Native Species
INNSMP	Invasive Non-Native Species Management Plan
JNBP	JERA Nex bp
LMP	Lighting and Marking Plan
MCAA	Marine and Coastal Access Act
MD-LOT	Marine Directorate – Licensing and Operations Team
MMMP	Marine Mammal Mitigation Protocol
MMObs	Marine Mammal Observer
MPCP	Marine Pollution Contingency Plan
MvOWL	Morven Offshore Wind Limited
NSVMP	Navigational Safety and Vessel Management Plan
NtM	Notice to Mariners
O&M	Operation and Maintenance
OFLO	Offshore Fisheries Liaison Officer
OSP	Offshore Substation Platform
PAD	Protocol for Archaeological Discoveries
PEMP	Project Environmental Monitoring Plan
RA	Retained Archaeologist
RAMS	Risk Assessment and Method Statements
ROV	Remote Operation Vehicles
SEM	Stakeholder Engagement Manager
SMP	Sectoral Marine Plan

Acronym	Meaning
SPMP	Scour Protection Management Plan
WMP	Waste Management Plan
WSI	Written Scheme of Investigation

## Units

Unit	Meaning
km	Kilometre
km <sup>2</sup>	Square Kilometre

# 1 Introduction

## 1.1 Purpose and scope

- 1.1.1.1 Morven Offshore Wind Limited (MvOWL), a joint venture between JERA Nex bp (JNBP), and Energie Baden-Württemberg AG (EnBW) (hereafter “the Applicant”), has been awarded a seabed option under the 2021/22 ScotWind Leasing Round for the Morven Option Lease Agreement Site (hereafter ‘Morven Site’), located wholly within Plan Option Area E1, identified in the Scottish Government’s Sectoral Marine Plan for Offshore Wind Energy (the SMP) (Scottish Government, 2020).
- 1.1.1.2 The Morven North Offshore Wind Array Project (hereafter, “Morven North”) and the Morven South Offshore Wind Array Project (hereafter, “Morven South”) are both located within the Morven Site in Scottish offshore waters (Figure 1.1). Morven North is located approximately 61km from the Aberdeenshire coast (at its closest point) and Morven South is located approximately 86km from the Aberdeenshire coast (at its closest point). Each project will comprise wind turbines, Offshore Substation Platforms (OSP), associated foundations, inter-array and interconnector cables and cable protection. Consent for the offshore export cables of Morven North and Morven South will be sought separately.
- 1.1.1.3 This Environmental Management Plan (EMP) (Version 1) has been prepared by Tetra Tech RPS Energy and the Applicant to support the Environmental Impact Assessments (EIA) for Morven North and Morven South. This EMP (Version 1) covers the activities included in Section 1.2 of Volume 1, Chapter 1: Introduction, of the Morven North and Morven South EIA Reports. The key components of Morven North and Morven South include:
- wind turbines, including foundations;
  - inter-array cables;
  - OSPs, including OSP foundations;
  - scour protection;
  - cable protection;
  - interconnector cables.
- 1.1.1.4 This shared report outlines the proposed mitigation commitments for both Morven North and Morven South at the point of application. Post-consent, separate EMPs will be prepared for Morven North and Morven South. All the designed in measures in this shared report are included in Volume 3, Annex 6.3: EIA Commitments Register.
- 1.1.1.5 This EMP (Version 1) serves as a unified reference that captures all environmental commitments applicable to all phases of Morven North and Morven South. The purpose of the EMP (Version 1) is to ensure these commitments are managed efficiently and communicated effectively to all relevant parties. The EMP will be reviewed and updated as required before construction begins, and at each subsequent project phase (e.g. O&M and decommissioning), so that it accurately reflects the latest environmental requirements and obligations for both Morven North and Morven South at each phase.
- 1.1.1.6 This EMP also provides practical guidance to those involved in all phases of Morven North and Morven South. This provides a foundation for the management of the associated environmental impacts. This EMP (Version 1) has been prepared in accordance with the following industry guidance:
- Institute of Environmental Management and Assessment (IEMA) Guidance on Environmental Management Plans (IEMA, 2008);
  - Institute of Sustainability and Environmental Professionals (ISEP, formerly IEMA) Guidance: Implementing the Mitigation Hierarchy from Concept to Construction (ISEP, 2024); and
  - Evidence Review Note: Environmental Impact Assessment (Offshore Wind Evidence and Knowledge Hub (OWEKH), 2025).

- 1.1.1.7 IEMA (2008) informs the foundational structure and purpose of this EMP. The guidance and review note published by ISEP and OWEKH builds on this foundation by clarifying how mitigation should be generated, embedded and applied at each phase of a project. These documents provide a coherent and complementary framework that ensures the EMP is developed to reflect best practice in mitigation and post-consent delivery for Morven North and Morven South.
- 1.1.1.8 The Applicant personnel, contractors and subcontractors must comply with the requirements of the finalised EMP and all relevant associated documents. Specific requirements for all personnel are provided in Section 2.
- 1.1.1.9 This EMP (Version 1) provides provisional roles (naming and associated responsibilities), however, the Applicant reserves the right for listed roles and responsibilities to be carried out by alternative personnel within the applicant team. The final roles, naming of said roles, and responsibilities will be confirmed during the pre-construction phase, with the associated EMP submitted for approval by MD-LOT. The delivery of the key responsibilities listed in this EMP (Version 1), are committed to at this pre-application stage.

## 1.2 Aims and objectives

- 1.2.1.1 The aim of this EMP is to ensure all designed-in measures and monitoring commitments made in the Morven North and Morven South EIA Reports are implemented. This includes those designed-in measures and monitoring commitments that are considered necessary to reduce potential impacts.
- 1.2.1.2 The main objectives of this document are therefore to:
- present information on Morven North and Morven South, outlining the specific measures designed to avoid, minimise, and control environmental impacts identified in the Morven North and Morven South EIA Reports;
  - provide a framework for monitoring the receiving environment.
- 1.2.1.3 The EMP will be finalised and adopted prior to the construction phase of Morven North and Morven South. With each update, additional environmental requirements and management measures will be incorporated to address the specific needs of each project phase as required. Therefore, this EMP is considered a live document that will be further developed in accordance with the requirements of the relevant conditions and in consultation with relevant stakeholders.

## 1.3 Document structure

- 1.3.1.1 This EMP is divided into two main sections:
- Part I: Management, implementation and communication (Section 2):
    - This part outlines how the EMP will be managed and implemented, providing details of the roles and responsibilities, and lines of communication.
  - Part II: Environmental impacts and control measures (Section 3):
    - This part presents a register of potential environmental impacts identified and details any associated control measures.
- 1.3.1.2 Key sub-plans form an important part of the EMP. These sub-plans are included as appendices to this document (Appendix 1.1, Appendix 1.2 and Appendix 1.3). The sub-plans currently included are:
- Appendix 1.1: Marine Pollution Contingency Plan (MPCP) (Version 1);
  - Appendix 1.2: Invasive Non-Native Species Management Plan (INNSMP) and Biosecurity Plan (Version 1);
  - Appendix 1.3: Scour Protection Management Plan (SPMP) (Version 1).

## 1.4 Other relevant documents

- 1.4.1.1 Once final design and consent conditions are known, the final EMP will form part of a suite of consent plans that will be required as a condition included in the marine licences (under the Marine and Coastal Access Act (2009) (MCAA)) and Section 36 Consents for Morven North and Morven South. While the final list of consent plans may be refined during the project consenting process, the plans currently identified include the following:
- Fisheries Mitigation, Monitoring and Communication Plan (FMMCP);
  - Lighting and Marking Plan (LMP), including consideration of Aids to Navigation;
  - Morven North Marine Mammal Mitigation Protocol (MMMP);
  - Morven South MMMP;
  - Navigation Safety Plan and Vessel Management Plan (NSPVMP);
  - Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD).
- 1.4.1.2 In addition, the following consent plans are planned to be drafted post-consent:
- Construction Method Statement (CMS);
  - Construction Programme;
  - Piling Strategy;
  - Design Statement;
  - Development Specification and Layout Plan (DSLPL);
  - Emergency Response and Cooperation Plan (ERCoP);
  - Waste Management Plan (WMP);
  - Project Environmental Monitoring Plan (PEMP).
- 1.4.1.3 The PEMP will outline the Applicant's commitments to monitoring the potential effects arising from Morven North and Morven South on key receptors and will describe how this monitoring will be carried out throughout all phases. The PEMP will be prepared in collaboration with MD-LOT and other key stakeholder's post-consent.
- 1.4.1.4 The EMP that covers the management of environmental risks and mitigation measure across the lifetime of Morven North and Morven South.
- 1.4.1.5 In line with the requirements of section 105(2) of the Energy Act 2004, the Applicant must prepare and submit a Decommissioning Programme (DP<sub>2</sub>). The DP<sub>2</sub> will address the decommissioning of offshore installations and offshore renewable energy infrastructure located within in Scottish waters or in the Scottish part of the Renewable Energy Zone under the Energy Act 2004 (Scottish Government, 2025). The DP<sub>2</sub> requires additional detailed design work to be completed before the document can be drafted; however, it will be submitted to MD-LOT for approval prior to the commencement of construction works for Morven North and Morven South and will be updated prior to commencement of decommissioning works.
- 1.4.1.6 This EMP, associated sub-plans and all other required consent plans will be developed once the detailed design for Morven North and Morven South has progressed and the relevant consent conditions have been finalised. The specific consent plans will be developed collaboratively with key stakeholders for submission to, and approval by, Marine Directorate – Licensing and Operations Team (MD-LOT), prior to the commencement of construction.
- 1.4.1.7 Throughout the lifetime of Morven North and Morven South, this EMP, sub-plans and all other required consent plans will be reviewed and updated as necessary to ensure that the documents always reflect the commitments made in the Morven North and Morven South EIA Reports and any associated conditions of consent or requirements agreed with the relevant authorities.

## 1.5 Background and consents

### 1.5.1 Project background

#### ***Morven North***

1.5.1.1 Morven North is a proposed fixed-foundation offshore wind farm located approximately 61km from the Aberdeenshire coast. The Morven North Boundary is illustrated within Figure 1.1 and covers an area of 511.1km<sup>2</sup>. Morven North includes the following components:

- up to 96 wind turbines;
- up to five OSPs and associated support structures and foundations, including:
  - up to four High Voltage Alternating Current (HVAC) collector substation platforms;
  - up to one High Voltage Direct Current (HVDC) convertor substation (this could be a single platform or two platforms linked by a bridge)<sup>1</sup>;
- a network of inter-array cabling linking the individual wind turbines to each other and to the OSPs, plus interconnector cables connecting OSPs to each other (up to 424km of inter-array cabling and 484km of interconnector cabling).

#### ***Morven South***

1.5.1.2 Morven South is a proposed fixed-foundation offshore wind farm located approximately 86km from the Aberdeenshire coast. The Morven South Boundary is illustrated within Figure 1.1 and covers an area of 347.7km<sup>2</sup>.

1.5.1.3 Morven South includes the following components:

- up to 95 wind turbines;
- up to five OSPs and associated support structures and foundations, including:
  - up to four HVAC collector substation platforms;
  - up to one HVDC convertor substation (this could be a single platform or two platforms linked by a bridge);
- a network of inter-array cabling linking the individual wind turbines to each other and to the OSPs, plus interconnector cables connecting OSPs to each other (up to 420km of inter-array cabling and 264km of interconnector cabling).

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<sup>1</sup> For the purposes of assessment in the Morven North and Morven South EIA Reports, the bridge-linked HVDC OSP has been treated as a single structure. Only one bridge-linked HVDC OSP will be required across the two projects: if it is included within the Morven North design, it will not be required for Morven South, and vice versa.

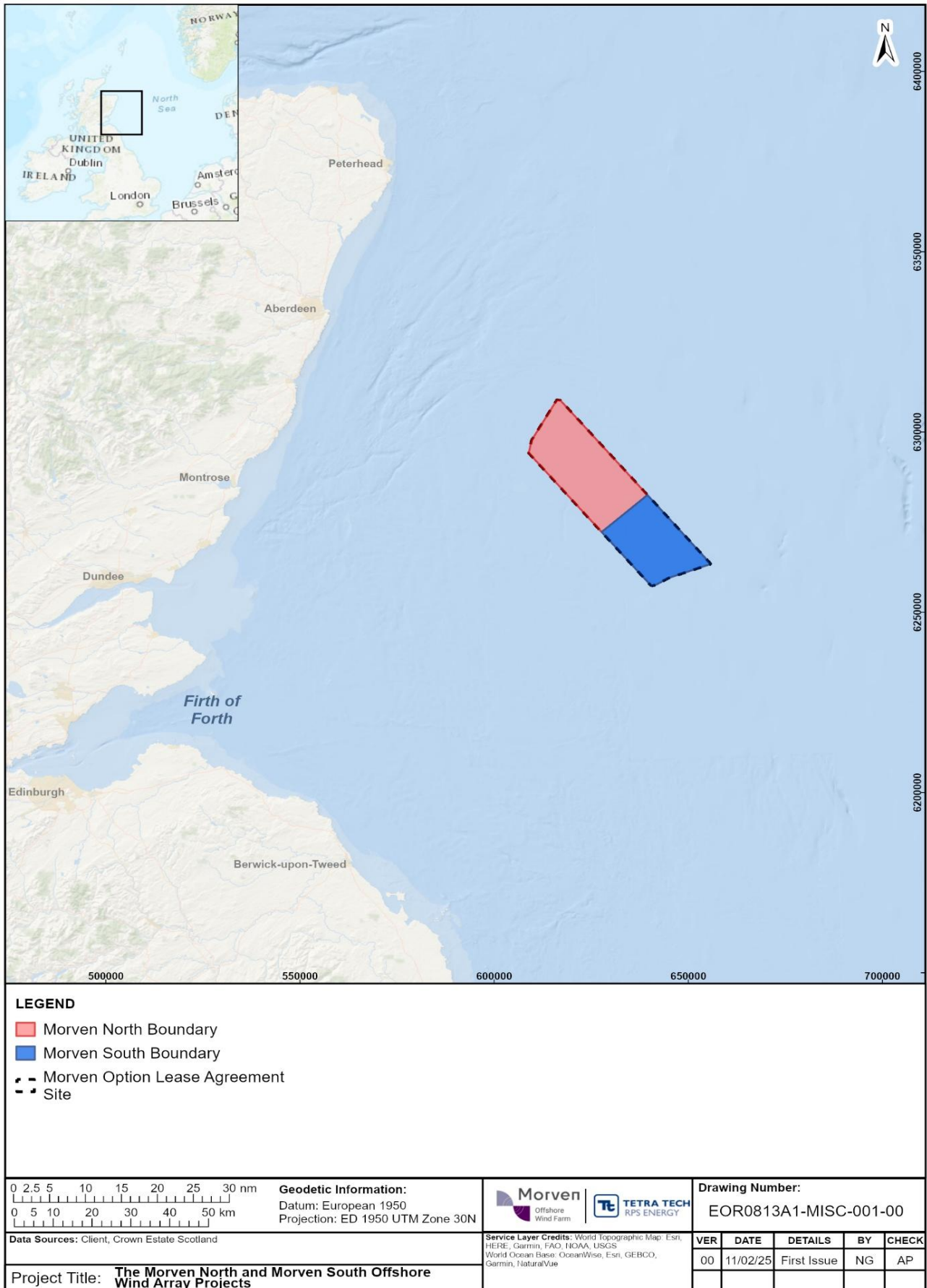


Figure 1.1: The boundaries of Morven North and Morven South within the Morven Option Lease Agreement Site

## 1.5.2 Consents

- 1.5.2.1 The Applicant is submitting this EMP (Version 1) as part of the Morven North and Morven South Consent applications and will seek the approval of the Scottish Ministers for the commitments within this EMP prior to commencement of construction.
- 1.5.2.2 Table 1.1 and Table 1.2 outline the consents obtained for Morven North and Morven South. The information in these tables will be populated once Section 36 Consents for Morven North and Morven South are awarded. The EMP is considered to be a 'live' document that will be reviewed and updated as required and split into separate EMPs for Morven North and Morven South post-consent.

**Table 1.1: Morven North consents**

Licence	Legislation	Provider	Date

**Table 1.2: Morven South consents**

Licence	Legislation	Provider	Date

## 2 Part I: Management, implementation and communication

### 2.1 Roles and responsibilities

#### 2.1.1 Overview

2.1.1.1 This section outlines the provision roles and responsibilities of the Applicant personnel, contractors and subcontractors in relation to this EMP. These roles, naming of said roles and associated responsibilities are provisional at this pre-consent stage, and final roles, naming of said roles and responsibilities will be confirmed during the pre-construction phase, with the associated EMP submitted for approval by MD-LOT. The key, provisional roles relevant to this EMP, are described in Section 2.1.2 to 2.1.4. The roles related to the EMP are:

- Applicant’s environmental manager;
- Applicant’s function managers;
- independent Environmental Clerk of Works (EnvCoW; to monitor and report compliance);
- Ecological Clerk(s) of Works (ECoW; to support Applicant with compliance);
- Applicant’s Stakeholder Engagement Manager (SEM);
- contractor’s/subcontractor’s environmental manager;
- Retained Archaeologist (RA);
- archaeological Contractor;
- Marine Mammal Observer (MMObs) and associated roles;
- Company Fisheries Liaison Officer (CFLO);
- Offshore Fisheries Liaison Officer (OFLO);
- Fishing Industry Representatives (FIR<sup>2</sup>);
- marine coordinator;
- biosecurity manager.

2.1.1.2 These roles will be further defined and agreed with MD-LOT prior to the commencement of construction.

2.1.1.3 Figure 2.1 provides an overview of the lines of communication between the key management roles and the contractors/subcontractors.

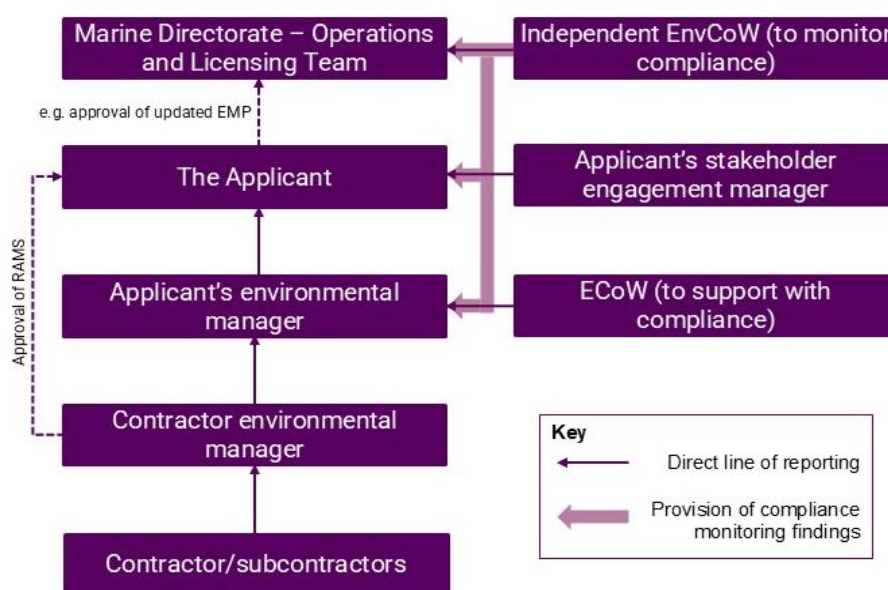


Figure 2.1: Key lines of communication

## 2.1.2 The Applicant: key management roles relating to environmental management

### ***Applicant's environmental manager***

2.1.2.1 An environmental manager or similar, will be appointed by the Applicant during the development stage of Morven North and Morven South. This resource will continue to oversee compliance with the EMP and all other consent management plans and associated consent conditions, including those referenced in Section 1.4, throughout all phases of Morven North and Morven South. The Applicant will also maintain this role during the O&M and decommissioning phase to ensure all consent conditions are met and to supervise the implementation of the consent plans outlined in this EMP.

2.1.2.2 The key responsibilities of the Applicant's environmental manager (or similar) will be further defined as part of any required updates to this EMP before construction begins. These responsibilities may include the following; however, a final list of responsibilities will be confirmed post-consent:

- overseeing compliance with all environmental obligations outlined in the EMP and all other consent management plans throughout all phases of Morven North and Morven South;
- appointing the independent EnvCoW (named individual subject to written approval by MD-LOT);
- appointing and managing the ECoW;
- ensuring contractors and subcontractors implement the EMP and adhere to its requirements;
- monitoring compliance with contractual obligations, including environmental management;
- participating in progress meetings related to Morven North and Morven South, facilitating inductions and training, and addressing any corrective actions identified during environmental audits;
- reporting to the Applicant senior management team.

### ***Applicant's function managers***

2.1.2.3 The environmental manager will be supported by the Applicant's function managers (or similar), who are responsible for specific engineering work packages such as marine installation and wind turbine deployment. While function managers' responsibilities align with those of the environmental manager, their focus will remain on their designated work streams.

2.1.2.4 The key responsibilities of the Applicant's function managers will be further defined as part of any required updates to this EMP before construction begins. This refinement will include providing a timescale as to which of the phases of Morven North and Morven South that the Applicant's function managers are required. In addition to managing the delivery of specific work packages, their responsibilities may include:

- ensuring environmental obligations are embedded in contracts with relevant resources in place to meet the requirements of the EMP;
- responsibility for incorporating environmental topics into work package meetings to support the Applicant's environmental manager in ensuring all personnel receive appropriate training;
- supporting site inspections, reporting, and ensuring that corrective actions are implemented where necessary.

### ***Independent environmental clerk of works (EnvCoW)***

2.1.2.5 The Applicant may be required to appoint an independent EnvCoW prior to the start of construction. The named individual for the role of EnvCoW will require written approval by MD-LOT, in consultation with NatureScot. The EnvCoW will review and approve draft consent management plans before their submission to MD-LOT for approval. This role will remain in place throughout the pre-construction, construction phases and decommissioning phases of Morven North and Morven South, or until a date agreed by MD-LOT. Monitoring compliance duties during the O&M phase are that of the Applicant's environmental manager.

- 2.1.2.6 The EnvCoW is responsible for monitoring compliance of the Applicant and its contractors against legislation, planning consents, environmental permits, consent plans and mitigation commitments. An EnvCoW cannot 'ensure' compliance on a project, as the role is responsible for monitoring and reporting compliance. The independent EnvCoW will report directly to MD-LOT, informing them of compliance performance, including any incidents of non-compliance. The Applicant will be provided with all monitoring reports at the time of delivery to MD-LOT. The definition of this role is recognised by the Association of EnvCoWs (AEnvCoW), Heads of Planning Scotland (HOPS) and NatureScot (AEnvCoW, 2025; HOPS, 2023; Scottish Outdoor Access Code, 2024).
- 2.1.2.7 Key responsibilities of the independent EnvCoW may include the following, based on conditions in previous Section 36 Consents and marine licences issued for Scottish offshore wind farm projects, however a final list of responsibilities will be confirmed with MD-LOT post-consent:
- Quality assurance of final draft versions of all consent management plans and programmes required under the marine licence and the Section 36 Consent.
  - Monitoring and reporting compliance with consent conditions and all environmental mitigation and monitoring measures for Morven North and Morven South.
  - Preparing and submitting reports on consent compliance to MD-LOT at agreed timescales.
  - Monitoring that construction activities for Morven North and Morven South are conducted in accordance with consent management plans and all relevant regulations and legislation.
  - Reviewing and reporting incidents or near misses as necessary to MD-LOT.
  - Establishing a communication strategy with MD-LOT.
  - Conducting on-site inspections during construction to supervise contractor and subcontractor compliance with the Morven North and Morven South EIA Reports, EMP, and all other consent management plans.

### ***Ecological clerk of works***

- 2.1.2.8 The ECoW will report directly to the Applicant's environmental manager and collaborate with contractors and subcontractors (see Section 2.1.3). The ECoW is responsible for notifying staff of environmental issues, and informing regulators and relevant statutory stakeholders, of any non-compliance with the EMP.
- 2.1.2.9 Key responsibilities of the ECoW are expected to include the following list. This is based on conditions in previous Section 36 Consents and marine licences issued for Scottish offshore wind farm projects, however it is prudent to ensure the consent compliance for Morven North and Morven South is well managed to minimise risk to programme and budget. A final list of responsibilities will be confirmed post-consent:
- Tracking compliance with consent conditions and all environmental mitigation and monitoring measures for Morven North and Morven South.
  - Providing ongoing advice and guidance to the Applicant to support compliance with consent conditions, including the implementation of consent management plans.
  - Delivering inductions and toolbox talks to on-site construction teams on environmental policy and procedures, including managing temporary stops and maintaining records.
  - Promoting a positive culture of environmental awareness throughout all phases, including increasing awareness of environmental considerations.
  - Reviewing and reporting incidents or near misses and updating procedures within Morven North and Morven South.
  - Ensuring all environmental responsibilities and commitments outlined in the EMP and all other consent management plans are fulfilled during the construction phase and, when required, the O&M phase.
  - Maintaining an environmental presence and conducting on-site audits during construction to supervise contractor and subcontractor compliance with the Morven North and Morven South EIA Reports, EMP, and all other consent management plans.
  - Attending project meetings and contributing to environmental matters as needed.
  - Supporting the Applicant's environmental manager in stakeholder engagement.

### ***Applicant's Stakeholder Engagement Manager***

2.1.2.10 In addition to the Applicant's environmental manager, the Applicant will appoint a SEM (or similar) throughout the construction and O&M phases. The environmental manager and contractor will engage with the SEM to facilitate engagement with the communities in the vicinity of Morven North and Morven South.

### **2.1.3 Contractors and subcontractors**

2.1.3.1 All contractors and subcontractors are contractually required to adhere to MvOWL Employer Requirements, industry standard good environmental practices, the measures set out in the Morven North EIA Report and Morven South EIA Report, the EMP, and all relevant consent management plans. Industry standard good practice will reflect standards at the time of construction/project phase, but are likely to include:

- Coastal and Marine Environmental Site Guide (second edition), CIRIA Report C744, 2015;
- Environmental good practice on site guide (fifth edition), CIRIA, October 2023;
- Downie, E (2026). EnvCoWs: Industry Guiding Principles for Developments, ISEP & AEnvCoW.

2.1.3.2 They must ensure that their activities fully comply with these requirements as confirmed prior to works commencing.

2.1.3.3 The Applicant, and all contractors, , will update the EMP as needed throughout the construction phase of Morven North and Morven South, as required. The Applicant will approve all updates and submit the revised EMP to MD-LOT for regulatory approval.

2.1.3.4 Key responsibilities of the contractors/subcontractors will include the following a final list of responsibilities will be confirmed post-consent:

- Ensure that all environmental responsibilities outlined in the EMP and Morven North and Morven South EIA Reports, and all other consent management plans, are fulfilled throughout the duration of Morven North and Morven South.
- Maintain adequate resources and processes to achieve compliance with the EMP and effectively manage the potential environmental impacts of their activities.
- Provide risk assessments and method statements (RAMS) addressing the environmental aspects of all planned activities prior to commencement. These RAMS must be submitted for approval to the Applicant prior to works commencing and must include proposed designed-in measures relevant for each task, in accordance with MvOWL Control of Work Procedure.
- Implement all required environmental control measures as specified in the Morven North EIA Report and Morven South EIA Report, EMP, and all other consent management plans.
- Read, understand, and comply with all consent conditions relevant to their activities.
- Maintain regular communication with the Applicant's environmental manager (or similar) and the independent EnvCoW, prioritising the reporting of environmental risks, incidents, or queries.
- Provide collated environmental monitoring data, conduct inspections, and submit environmental reports as required by the Applicant's environmental manager (or similar).
- Ensure all personnel receive sufficient training and induction before starting work on Morven North and Morven South.
- Confirm the competency of all staff and ensure their tasks are performed in accordance with the EMP.
- Comply with all relevant environmental legislation and perform duties in alignment with the environmental policies, plans, procedures, and rules for Morven North and Morven South.

2.1.3.5 This EMP establishes the minimum standards that all contractors and subcontractors must follow (e.g. see para 2.1.3.1). Any additional control measures identified during the review of their activities should be detailed within the contractor or subcontractor RAMS.

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### ***Contractor's environmental manager***

- 2.1.3.6 A full-time contractor's environmental manager (or similar) with relevant evidence and expertise (e.g. minimum of five years of relevant site experience) will be hired by the contractor (e.g. the main construction contractor, Engineering, Procurement and Construction contractor etc) throughout all phases of Morven North and Morven South. The contractor's environmental manager will report to the Applicant's environmental manager (or similar) (Figure 2.1).
- 2.1.3.7 The contractor's environmental manager will verify the correct implementation of Morven North and Morven South environmental design, control and designed-in measures outlined in the Morven North and Morven South EIA Report, EMP and consent management plans. The key responsibilities of the contractor's environmental manager will include the following. A final list of responsibilities will be confirmed post-consent:
- Ensuring all environmental responsibilities relating to the contractor's environmental manager (or similar), including those in the EMP and all other consent management plans are fulfilled for the duration of the relevant phases of Morven North and Morven South.
  - Maintain sufficient resources and processes to deliver and comply with the EMP and effectively manage potential environmental impacts.
  - Review and regularly update the EMP and supporting environmental documentation during the construction phase, ensuring consistency with the Morven North and Morven South EIA Report.
  - Incorporate any new environmental requirements introduced through the consents process, with all revisions to the EMP or other consent management plans subject to approval by the Applicant's environmental manager (or similar).
  - Conduct environmental audits, inspections, and reporting to ensure construction activities adhere to the Morven North and Morven South EIA Report, EMP, and all other consent management plans.
  - Implement and manage an environmental monitoring programme, collating relevant reports and records, all of which require approval from the Applicant's environmental manager (or similar).
  - Promote a positive environmental culture through training and engagement with site management and operatives, fostering increased environmental awareness.
  - Ensure timely remediation and reporting of any environmental incidents or non-compliance to the Applicant's environmental manager (or similar);
  - Communicate statutory requirements and best environmental practices as stated in the EMP through toolbox talks, tailored to on-site activities and updated to reflect any reports of non-compliance. These responsibilities should be communicated to all relevant contractors and subcontractors included in the EMP.
  - Supervising and monitoring the implementation of, and ongoing compliance with the EMP.
  - Advising contractors and subcontractors on compliance with the EMP.
  - Introducing site staff to the environmental policy, procedures and requirements of the EMP.

## **2.1.4 Supporting environmental roles**

### ***Retained Archaeologist***

- 2.1.4.1 The Retained Archaeologist (RA) is the archaeological contractor or consultant appointed by the Applicant to implement the WSI and PAD. Therefore, the RA will be appointed from the post-consent phase and remain *in situ* throughout the lifetime of Morven North and Morven South. The first task acting as RA is to update the WSI and PAD and submit this for approval to MD-LOT ahead of implementation. The RA will be the first person that the Applicant's environmental manager will contact relating to archaeological matters. The roles and responsibilities associated with the RA are outlined in the WSI and PAD (Volume 4, Annex 6: Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (Version 1)).

### ***Archaeological contractors***

- 2.1.4.2 The archaeological contractors will be employed by the Applicant, or the RA. Suitable qualified archaeological contractors may be called to provide a range of services relating to specialised archaeological provisions (e.g. undertaking fieldwork and geotechnical analysis etc). The scope of any such services will be defined in an agreed method statement.

### ***Marine Mammal Observer and associated roles***

- 2.1.4.3 A MMObs may be in post through potentially noise generating activities for example impact piling, Unexploded Ordnance (UXO) clearance and geophysical site investigation surveys (Volume 4, Annex 2: Morven North Marine Mammal Mitigation Protocol (Version1)) during the construction period, if required. The lead MMObs will report to the Applicant's environmental manager (or similar) and/or ECoW as required. These periods of noise generating activities and the roles associated with the MMObs are outlined in the Morven North MMMP (Volume 4, Annex 2: Marine Mammal Mitigation Protocol (MMMP) (Version 1)) and Morven South MMMP (Volume 4, Annex 2: Marine Mammal Mitigation Protocol (MMMP) (Version 1)).
- 2.1.4.4 The below roles are associated with the MMObs, and details of their responsibilities are detailed in the Morven North MMMP (Volume 4, Annex 2: Marine Mammal Mitigation Protocol (MMMP) (Version 1)) and Morven South MMMP (Volume 4, Annex 2: Marine Mammal Mitigation Protocol (MMMP) (Version 1)). Clear communication is required between the MMObs, Passive Acoustic Monitoring (PAM) operator, Acoustic Deterrent Device (ADD) operator, Explosive Ordnance Disposal (EOD) or geophysical survey supervisor and the ECoW to ensure that the requirements of the MMMP are met. The associated roles are as follows:
- There will be one specialist, trained, and dedicated PAM operator who will be responsible for acoustically tracking vocalising marine mammals using a hydrophone, via appropriate computer software (e.g. PAMguard).
  - There will be one ADD operator responsible for deploying, maintaining and operating the ADDs and any spare ADDs.
  - An EOD supervisor will be required during Unexploded Ordnance clearance activities.

### ***Company Fisheries Liaison Officer***

- 2.1.4.5 The Applicant has appointed a CFLO for Morven North and Morven South. The main responsibilities associated with the CFLO are detailed in the FMMCP ( Volume 4, Annex 3: Fisheries Mitigation Monitoring Communication Plan (FMMCP) (Version 1)). In summary the CFLO will:
- maintain the fisheries stakeholder database that contains information on fishing vessel operations within and around Morven North and Morven South;
  - organise, prepare updates and attend fisheries and stakeholder meetings/events;
  - manage and coordinate OFLOs that are supporting works at sea;
  - communicate details of any dropped objects to the fishing industry. Dropped objects should be reported to stakeholders within 24 hours of the event occurring (or otherwise as soon as practicable);
  - coordinate the activities and responsibilities of the FIR<sup>2</sup>s (if required);
  - provide monthly reporting to the Applicant's Environmental Manager during the construction phase of Morven North and Morven South.

### ***Offshore Fisheries Liaison Officer***

- 2.1.4.6 OFLOs will be appointed to survey and construction vessels as needed to facilitate communication with fisheries and stakeholders at sea. CFLOs will engage suitably qualified OFLOs throughout the construction and O&M phases of Morven North and Morven South. The main responsibilities of the OFLO are outlined in the FMMCP (Volume 4, Annex 3). In summary, the OFLO will:

- communicate regularly with the CFLO and the Applicant and/or their contractors/subcontractors regarding fishing vessel activities around Morven North and Morven South;
- inform the masters' and watcher officers of survey and construction vessels of any fishing activities in the area surrounding their vessel working zone(s);
- liaise with fishermen who may have static gear deployed in the vicinity of Morven North and Morven South;
- collaborate with vessel master's to ensure compliance with relevant aspects of the FMMCP.

### ***Fishing Industry Representatives***

2.1.4.7 To further aid the establishment of effective communication channels and to provide benefit from extensive local knowledge, one or more FIR<sup>2</sup>(s) may be appointed. Part of the FIR<sup>2</sup> role will be to ensure skippers of fishing vessels are aware of any forthcoming operations or other ongoing activities related to Morven North and Morven South which may affect their fishing activity and operations. The roles and responsibilities of the FIR<sup>2</sup> and CFLO can be very similar and while the roles are often delivered by one individual dependent on knowledge and resource requirements, the Applicant will seek to keep these roles separate. The main responsibilities associated with the FIR<sup>2</sup> are detailed in the FMMCP (Volume 4, Annex 3: Fisheries Mitigation Monitoring Communication Plan (FMMCP) (Version 1)). In summary, the FIR<sup>2</sup> will:

- liaise with fishing skippers
- provide details of fishing activities in the area and particular sensitivities;
- log all concerns raised by fishers;
- assist the CFLO at a local level in undertaking their tasks;
- assist in the distribution of notices and relevant project information to local fisheries stakeholders.

### ***Marine coordinator***

2.1.4.8 A marine coordinator (or similar) will be appointed, or delivered by another resource, for both Morven North and Morven South. This role will serve as the primary point of contact in the event of an emergency or pollution incident and will support the ongoing response to pollution incidents. The primary responsibilities of the marine coordinator (or similar) will include the following. A final list of responsibilities will be confirmed post-consent:

- coordinating day-to-day vessel operations associated with Morven North and Morven South;
- supporting the fulfilment of requirements outlined in the EMP and relevant consent plans;
- informing and advising other vessels in the area about potential archaeological discoveries;
- assisting in the coordination and execution of planned responses to pollution incidents and/or clean-up operations, in accordance with the procedures detailed in the MPCP (Volume 4, Annex 1, Appendix 1.1: Marine Pollution Contingency Plan (MPCP) (Version 1)).

### ***Biosecurity manager***

2.1.4.9 The biosecurity manager (or similar) is responsible for the practical implementation and adherence to the INNSMP and Biosecurity Plan. The main responsibilities associated with the biosecurity manager are detailed in the INNSMP and Biosecurity Plan (Volume 4, Annex 1, Appendix 1.2: Invasive Non-Native Species Management and Biosecurity Plan (Version 1)). In summary, the biosecurity manager will include the following. A final list of responsibilities will be confirmed post-consent:

- develop, implement and review monitoring measures to prevent the introduction and spread of harmful biological agents, invasive non-native species (INNS);
- coordinate the reporting of any unusual sightings of potential invasive non-native species (INNS) within the vicinity of Morven North and Morven South from staff and site users;
- conduct biosecurity surveillance, INNS checks, wider surveys of vessels and reporting procedures;

- review of the logging system (e.g. logbook) with all reports of the potential introduction of INNS.

### **2.1.5 Contact details**

2.1.5.1 A Morven North and Morven South contacts sheet will be compiled prior to the commencement of construction at Morven North and Morven South and included as an appendix to the EMP (Appendix A). This list will include contact details of all Applicant, Contractor/Subcontractor and relevant third parties. This list will be made available to all parties working on Morven North and Morven South and will be regularly updated throughout all phases of Morven North and Morven South.

2.1.5.2 As a minimum, the contacts sheet will include the following information:

- company/organisation;
- position;
- name;
- telephone/mobile numbers;
- email address;
- office location.

## **2.2 Communication and reporting**

2.2.1.1 Regular progress meetings will be held before and during construction and O&M activities, involving the Applicant's environmental manager (or similar), the Applicant's ECoW, the independent EnvCoW (as required), and all relevant contractors and subcontractors, in accordance with MvOWL Consultation, Communication & Engagement Procedure. These meetings will include dedicated discussions on environmental management and compliance with consent obligations, led by either the Applicant's environmental manager or the contractor's environmental manager.

2.2.1.2 Contractors and subcontractors will receive copies of all relevant consents and will be informed of the specific consent obligations associated with their activities. All RAMS will be reviewed by the Applicant's environmental manager (or similar) and/or the contractor's environmental manager.

2.2.1.3 Any environmental concerns or issues must be reported to the Applicant's environmental manager (or similar) as soon as it is safe to do so. A Safety and Environmental Awareness Report should be completed for all potential (near miss) or actual environmental incidents or emergencies occurring on-site, and all such incidents must be reported to the Applicant's emergency number as soon as it is safe to do so, in accordance with MvOWL Incident Reporting and Management Procedure.,

## **2.3 External communications**

2.3.1.1 All external communications, notifications, and reporting, including those related to environmental incidents for Morven North and Morven South, will be conducted in accordance with the commitments outlined in the Morven North and Morven South EIA Report, the requirements of the relevant consent conditions as detailed in the consent management plans and MvOWL External Communication Procedure.

### **2.3.2 Incident reporting**

Procedures to be followed after an environmental incident (excluding marine pollution incidents) will be detailed in the MvOWL Incident Reporting & Management Procedure. This document will be produced and included as an appendix to the EMP prior to the start of construction activities.

2.3.2.1 The procedure for reporting marine pollution incidents during all phases of Morven North and Morven South (e.g. spills or contaminant releases) are provided in the MPCP (Volume 4, Annex 1, Appendix 1.1: Marine Pollution Contingency Plan (MPCP) (Version 1)).

### 2.3.3 Dropped objects

- 2.3.3.1 Any objects dropped on the seabed during works associated with Morven North and Morven South will be reported in line with MD-LOT procedures, MvOWL Incident Reporting & Management Procedure, and objects will be recovered where they pose a hazard to fishing or safe navigation, and where recovery is practicable.
- 2.3.3.2 In the event of an immediate risk of debris or an accidental deposit of an object at sea being a danger or hazard to navigation, immediate notification (as soon as reasonably possible, but no later than six hours after the event) must be made to the relevant HM Coastguard rescue coordination centre and the UK Hydrographic Office (navwarnings@ukho.gov.uk). Should the dropped object pose a navigational risk, a Notice to Mariners (NtM) and Kingfisher Notice will be issued once the location, and details of the object can be established. As detailed in paragraph 2.1.4.5, the CFLO is responsible for communicating details of any dropped objects to the fishing industry and reporting to stakeholders.
- 2.3.3.3 All dropped objects deemed to be a hazard to safe navigation by the Applicant, contractors and/or subcontractors will need to be recorded and submitted electronically to the organisations listed in the accidental deposit of an object at sea form. For information, a copy of the form has been included in this document in Appendix B. As outlined in MD-LOT's guidance, following review of the accidental deposit of an object at sea reporting form by MD-LOT, the Applicant will remove any accidentally deposited objects associated with Morven North and Morven South where practicable (Scottish Government, 2024).

## 2.4 Training, auditing and change management

### 2.4.1 Training and competence

- 2.4.1.1 Contractors and subcontractors must ensure they have sufficient appropriate resources and environmental management procedures in place for the duration of their contracted scope of work on Morven North and Morven South. All documentation produced by contractors and subcontractors must be reviewed by the Applicant to confirm compliance with the EMP, as well as all environmental and consent requirements.
- 2.4.1.2 The contractor will maintain a record of all the training delivered including details of the content and objectives of each training session and a log of all attendees including names and roles. These records should be maintained and be available both at the request of the Applicant's environmental manager and for audit and compliance reporting purposes, in accordance with the MvOWL Employer Requirements
- 2.4.1.3 All the training and competencies relevant to Morven North and Morven South will be regularly reviewed and updated throughout all phases of Morven North and Morven South, in accordance with MvOWL Training and Competency Procedure

#### ***Inductions***

- 2.4.1.4 As detailed in paragraph 2.1.3.7, it is the responsibility of the contractor's environmental manager (or similar) to ensure that all personnel detailed in Section 2.1 undertake environmental training and promote awareness of environmental management. As part of their induction to working on-site, all personnel will need to undertake mandatory environmental induction training. This will include, but is not limited to, the following:
- provision of a detailed description of the environmental risks and concerns on-site;
  - species and/or habitat protection requirements;
  - archaeological safeguarding measures;
  - pollution prevention measures;
  - waste management measures;

- walkthrough of the environmental risk map to identify sensitive areas and potential sources of pollution;
- plant service and repair procedures.

### ***Environmental awareness materials and training***

- 2.4.1.5 As detailed in paragraph 2.1.2.2, it is the responsibility of the Applicant's environmental manager (or similar) to facilitate training of personnel throughout all phases of Morven North and Morven South. Training and environmental awareness will be reinforced via regular communications, updates and engagement activities. These may include distributing environmental bulletins, training packs for new starts, newsletters to share any updates and digital resources (e.g. short videos and interactive modules). The contractor will ensure that there is recognition of good environmental practice amongst personnel to encourage continuous improvements.
- 2.4.1.6 The contractor will provide environmental notice boards and ensure that the boards are regularly updated to give details on:
- description of the key environmental risks alongside the associated designed-in measures;
  - the environmental constraints/risks maps illustrating the location of the environmental sensitivities and the required zone of exclusion;
  - location of emergency response equipment.

### ***Environmental toolbox talks***

- 2.4.1.7 Alongside the general toolbox talks delivered during all phases of Morven North and Morven South, specific toolbox talks related to environmental topics will be scheduled. These toolbox talks will be delivered by supervisors, Health, Safety and Environment personnel or designated environmental leads to raise awareness amongst personnel of the environmental risks associated with their tasks, while reinforcing the designed-in measures required to prevent or minimise impacts. The contractor's environmental manager will also deliver regular toolbox talks and training to discuss the purpose, requirements and procedures of the EMP and any updates or arising environmental issues.
- 2.4.1.8 The format of the toolbox talks may include short presentations, interactive discussions or visual demonstrations. Examples of potential key topics for the toolbox talks may include, but are not limited to:
- waste management, including waste storage, waste segregation and littering;
  - spill prevention and response procedures;
  - control of fuel and refuelling, and fuel handling procedures;
  - ecologically and archaeologically sensitive areas.

## **2.4.2 Monitoring and auditing**

- 2.4.2.1 Monitoring is a critical component of the EMP to ensure that all commitments are upheld, and all construction and O&M activities are carried out in accordance with the requirements and best practice standards outlined in the EMP.
- 2.4.2.2 The Commitments Register (Volume 3, Annex 6.4) sets out the designed-in measures and monitoring proposed for Morven North and Morven South. It will be the principal tool available for ensuring compliance with consent conditions and commitments. The Commitments Register (Volume 3, Annex 6.4) will also provide an audit trail of compliance throughout all phases of Morven North and Morven South and will be updated, reviewed and maintained prior to the commencement of each phase.
- 2.4.2.3 To verify adherence to the EMP, a structured programme of audits will be undertaken. Following the delivery of each toolbox talk on the purpose, requirements and procedures of the EMP, an audit will be scheduled to confirm that all personnel have understood the contents of the training. Audits could

include site visits and informal discussions with staff to assess awareness. The following timeline may be followed for completing audits:

- quarterly audits at a minimum, with additional audits at the discretion of the Applicant to be conducted by the Applicant's environmental manager (or similar);
- monthly construction audits carried out by the contractor's environmental manager with records of any required corrective actions maintained and provided to the Applicant's environmental manager;
- quarterly subcontractor audits undertaken by the contractor's environmental manager with reports provided to the contractor and the Applicant within two weeks of the audit being undertaken;
- weekly environmental inspections during construction carried out by the contractor's environmental manager with all relevant records delivered to the Applicant on request.

2.4.2.4 All monitoring and audit findings will be documented, and any observations or corrective actions addressed promptly. Where necessary, procedures within the EMP will be amended and any revisions will be submitted to the Applicant for approval before implementation and updates are provided to all relevant personnel. The Applicant's environmental manager will be responsible for these actions with some input required from contractors and subcontractors as and when required e.g. updates required to specialist procedures in the EMP.

### **2.4.3 Review and change management**

2.4.3.1 As previously mentioned, the EMP will undergo regular reviews throughout all phases of Morven North and Morven South. This will allow for the EMP to reflect any findings or lessons learned during each phase of Morven North and Morven South. Any updates to the EMP suggested by the contractor require the review and approval of the Applicant to ensure that any proposed updates are appropriate and feasible.

2.4.3.2 In the event of a new environmental sensitivity being identified during works, the contractor's environmental manager will initiate change management procedures including an assessment of the potential impacts. The EMP will be updated or amended as and when required, discussed with the Applicant and then submitted to MD-LOT for approval. All updates to the EMP will be recorded as part of the EMP review audit trail, and this will include details of the review undertaken.

## **3 Part II: Environmental impacts and control measures**

### **3.1 Environmental impacts and control measures**

- 3.1.1.1 As detailed in OWEKH (2025) the EMP “sets out the responsibilities and environmental standards with which the planning applicant (and any contractor) must comply” (OWEKH, 2025). This section of the EMP aims to detail how the commitments in the Morven North and Morven South EIA Reports will be practically implemented by the relevant personnel listed in Section 2.1.
- 3.1.1.2 The enhancement, mitigation and monitoring commitments are detailed in Volume 3 Annex 6.4: EIA Commitments Register. These commitments are prepared in accordance with consent conditions and therefore, by adhering to the EMP, its appendices and other relevant consent management plans, it can be ensured that all personnel will comply with the consents granted for Morven North and Morven South.
- 3.1.1.3 Chemical management will comply with UK Registration, Evaluation, Authorisation and Restriction of Chemicals (UK REACH) and other applicable UK chemicals legislation for all chemicals used during all phases of Morven North and Morven South.

### **3.2 Management of key environmental aspects and compliance obligations**

#### **3.2.1 Marine species**

- 3.2.1.1 If a wildlife incident occurs as a result of activities associated with Morven North and Morven South (e.g. disturbance or injury to a marine mammal) it must be reported promptly to the Applicant’s environmental manager (or similar), ECoW and/or the independent EnvCoW, all in accordance with the MvOWL Incident Reporting & Management Procedure. At a minimum, the report should include details of the activity being undertaken, photographs and weather conditions. The Applicant’s environmental manager (or similar), the independent EnvCoW or both, will then liaise with the relevant regulatory authority, where appropriate
- 3.2.1.2 The proposed approach to mitigating potential impacts on marine mammals is provided in Volume 4, Annex 2: Marine Mammal Mitigation Protocol (MMMP) (Version 1).

#### **3.2.2 Marine archaeology**

- 3.2.2.1 Details of the procedures that should be followed upon discovering any marine archaeology in the vicinity of Morven North and Morven South during the construction and O&M phases are set out in Volume 4, Annex 6: Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (Version 1).

#### **3.2.3 Other marine users**

- 3.2.3.1 Details of the procedures to manage and mitigate against potential impacts on marine users is described in Volume 3, Appendix 6.4: EIA Commitments Register. The approach to practically implementing the proposed designed-in measures is detailed in the following:
- FMMCP (Volume 4, Annex 3: Fisheries Mitigation Monitoring Communication Plan (FMMCP) (Version 1));
  - LMP (Volume 4, Annex 4: Lighting and Marking Plan (LMP) (Version 1));
  - NSPVMP (Volume 4, Annex 5: Navigation Safety Plan and Vessel Management Plan (NSPVMP) (Version 1)).

### **3.2.4 Marine pollution prevention and contingency planning**

3.2.4.1 The procedure for reporting marine pollution incidents during the construction and O&M phases of Morven North and Morven South (e.g. spills or contaminant releases) are provided in the MPCP (Volume 4, Annex 1, Appendix 1.1: Marine Pollution Contingency Plan (MPCP) (Version 1)).

3.2.4.2 The limit and procedures for reporting any chemical or spill is covered in the MPCP, including the use of UK Reach Regulations when using drilling fluids (Official Journal of the European Union, 2006).

### **3.2.5 Invasive non-native species**

3.2.5.1 The presence/absence of INNS is directly linked to the salinity of the site and presence of man-made structures. The methodology for assessing the risk of INNS in relation to Morven North and Morven South is detailed in the INNSMP and Biosecurity Plan (Volume 4, Annex 1, Appendix 1.2: Invasive Non-native Species Management Plan (INNSMP) and Biosecurity Plan (Version 1)).

### **3.2.6 Waste management**

3.2.6.1 Waste will be generated by Morven North and Morven South, with most of the waste expected to be generated during the construction and decommissioning phases.

3.2.6.2 The procedure for managing waste during all phases of Morven North and Morven South (e.g. disposal of, reusing, recycling and recovering materials) will be provided post-consent in the WMP which will be approved by MD-LOT prior to implementation and commencement of construction. The WMP will be reviewed and updated as required before construction begins, and at each subsequent project phase (e.g. O&M and decommissioning). The following aspects are expected to be a minimum requirement for the WMP, however final details will be confirmed post-consent:

- analysis of the waste arising/materials surpluses;
- specific waste management objectives for Morven North and Morven South;
- methods proposed for prevention, reuse and recycling of wastes;
- material handling procedures;
- proposals for education of workforce (e.g. via toolbox talks).

3.2.6.3 Some of the key responsibilities of the contractors and subcontractors addressed in the WMP are expected to include the following, however final details be confirmed post-consent:

- Comply with all applicable legislation and the requirements of Morven North and Morven South, and obtain all mandatory permits and licences relating to waste management;
- Deliver a waste reduction toolbox talk to all personnel to raise awareness of recycling and waste minimisation and the importance of the WMP;
- Handle waste materials in a manner that reduces damage and disturbance;
- Segregate all waste into appropriately labelled, secure containers;
- Inspect the contents of site waste and recycling containers;
- Implement waste reduction measures through reduction, recycling or elimination wherever practicable;
- Store and return all relevant waste to shore for disposal in accordance with the legal waste management framework;
- Adhere to the principals of the 1989 Basel Convention to prevent the unfair export of hazardous waste to developing countries (Basel International, 2025).

### 3.3 References

- A EnvCoW (2025). The Role of an Environmental Clerks of Work. Available at: <https://associationofenvcows.org/published-documents/position-statements/the-role-of-an-environmental-clerks-of-works/download/6-the-role-of-an-environmental-clerks-of-works>. Accessed: December 2025.
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## **Appendix A            Contacts sheet**

The Morven North and Morven South contacts sheet will be provided by the Applicant post-consent.

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**Appendix B  
form**

**Accidental deposit of an object at sea reporting**

## Offshore Renewable Energy - Accidental Deposit of an Object at Sea Reporting Form

Marine Directorate form for reporting an accidental deposit of an object at sea from the offshore renewable energy industry.

In the event of an immediate risk of debris or an accidental deposit of an object at sea being a danger or hazard to navigation, immediate notification (as soon as reasonably possible, but no later than six hours) must be made to the relevant [HM Coastguard rescue coordination centre](#) by telephone, and the UK Hydrographic Office ([navwarnings@ukho.gov.uk](mailto:navwarnings@ukho.gov.uk)).

For all accidental deposits of an object or debris in the sea, an 'accidental deposit of an object at sea form' must be submitted electronically to the organisations listed below as soon as possible and no later than 24 hours after the event takes place. Where required, updates can be provided.

Organisation	Organisation details
Marine Directorate (MD)	<a href="mailto:MD.MarineRenewables@gov.scot">MD.MarineRenewables@gov.scot</a>
Maritime & Coastguard Agency (MCA)	<a href="mailto:navigationsafety@mcga.gov.uk">navigationsafety@mcga.gov.uk</a>  <a href="mailto:renewables@hmcg.gov.uk">renewables@hmcg.gov.uk</a>  <a href="mailto:OELO@mcga.gov.uk">OELO@mcga.gov.uk</a>
Kingfisher at Seafish (Kingfisher)	<a href="mailto:kingfisher@seafish.co.uk">kingfisher@seafish.co.uk</a>
Northern Lighthouse Board (NLB)	<a href="mailto:Navigation@nlb.org.uk">Navigation@nlb.org.uk</a>
United Kingdom Hydrographic Office (UKHO)	<a href="mailto:navwarnings@ukho.gov.uk">navwarnings@ukho.gov.uk</a>
Scottish Fishermen's Federation (SFF)	<a href="mailto:PON2@sff.co.uk">PON2@sff.co.uk</a>
Regional Inshore Fisheries Group (RIFG) – contact relevant RIFG	<a href="mailto:rifg.scot">rifg.scot</a>

<b>1. Details</b>	
<b>AD reference number *MD staff only*:</b>	
<b>Date of first report (MM/DD/YYYY):</b>	
<b>Version and date of any report updates:</b>	
<b>Full Name of Reporter:</b>	
<b>Position/Title:</b>	
<b>Contact Telephone number:</b>	
<b>Contact email address:</b>	
<b>Operator/Organisation/Company responsible for accidental deposit of an object:</b>	
<b>Project name:</b>	
<b>Name of licensee (where applicable) for accidental deposit of an object:</b>	

<b>Name of vessel/installation (where applicable) for the accidental deposit of an object:</b>	
<b>2. Location/position of the accidental deposit of an object at sea</b>	
<b>Location/position of the installation/vessel at the time of the loss</b>	
<b>Latitude (WGS84 DD MM.MMM):</b>	
<b>Longitude (WGS84 DD MM.MMM):</b>	
<b>Location/position of the accidental deposit of an object at sea</b>	
<b>Latitude (WGS84 DD MM.MMM):</b>	
<b>Longitude (WGS84 DD MM.MMM):</b>	
<b>Date dropped:</b>	<b>Time (24hrs):</b>
<b>Weather conditions at time:</b>	
<b>Depth of sea (metres):</b>	
<b>Beaufort scale (tide rate/direction):</b>	<b>Wave height (metres):</b>
<b>If the location of the accidental deposit of an object at sea is not immediately known, please provide as much information as possible:</b>	
<b>3. Accidental deposit of an object(s) at sea details</b>	
<b>Provide a full description of the object(s), materials involved, function of object, dimensions, shape etc. Any maritime safety equipment (e.g. life rafts, life rings, life jackets etc) lost to sea must be reported to minimise the likelihood of unnecessary response mobilisation. Provide photos if available in all circumstances:</b>	
<b>If the object(s) are resting on the seabed, are they near any offshore assets? (Yes or No). If yes, provide more detail:</b>	

**Are the materials likely to float on sea surface or in water column? (Yes or No). If yes, provide more detail:**

**If the answer above is yes – are materials likely to reach shore or cross an international border?**

**Circumstances for accidental deposit of an object(s) at sea:**

**What are the plans to recover the object(s)? Include anticipated timescales for any recovery operation. If there are no plans to recover the object(s), specify why this is:**

**What are considered to be the risks and dangers to other users of the sea as a result of the lost or dumped object(s) not being recovered and how will these risks be mitigated?**

**Who will be/has been consulted as part of this decision making process?**

**Is there any further information that may be useful:**

**In addition to the mandatory organisations stated at the top of this form,  
please list the organisations you have/will copy this form to:**

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