MachairWind Offshore Windfarm

Appendix 7 Marine Pollution Contingency Plan

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Glossary of Acronyms

Term	Definition
AIS	Automatic Identification Systems
COLREG	International Regulations for Preventing Collisions at Sea
COSHH	Control of Substances Hazardous to Health
DCPSO	Duty Counter Pollution and Salvage Officer
ECC	Export Cable Corridor
EMP	Environmental Management Plan
ER	Emergency Response
ERCoP	Emergency Response Cooperation Plan
ERP	Emergency Response Plan
GT	Gross Tonnes
GW	Gigawatts
IFO	Intermediate Fuel Oil
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MCC	Marine Coordination Centre
MCS	Marine Coordination System
MD-LOT	Marine Scotland (Marine Directorate – Licensing Operations Team
MGN	Marine Guidance Note
MGO	Marine Gas Oil
MPCP	Marine Pollution Contingency Plan
MRCC	Maritime Rescue Coordination Centre
NCP	National Contingency Plan
OIM	Offshore Installation Managers
OSP	Offshore Substation Platforms
EMP	Environmental Management Plan
PPE	Personal Protective Equipment
PPM	Planned Preventative Maintenance
RAMS	Risk Assessment and Method Statements
SAR	Search and Rescue
SDS	Safety Data Sheets
SOLAS	International Convention for the Safety of Life at Sea
SOPEP	Shipboard Oil Pollution Emergency Plans

Term	Definition
UK	United Kingdom
WDA	Windfarm Development Area
WTG	Wind Turbine Generators

Glossary of Terms

Term	Definition
Cable protection	Protective measure to minimise the effects of scour and hazards along the offshore cables (e.g. to prevent cable exposure or snagging of vessel anchors or fishing gear), as well as for protecting these cables at infrastructure crossing points.
Collision	The act or process of two moving objects colliding.
Development Area	Application boundary for consenting purposes which, for the Project, consists of a Windfarm Development Area, Offshore Export Cable Corridor, and Onshore Transmission Development Area. Separate consent and marine licence applications will be submitted for each Development Area where applicable.
Environmental Impact Assessment (EIA)	The process of evaluating the likely significant environmental effects of a proposed development over and above the existing circumstances (or 'baseline').
Environmental Impact Assessment (EIA) Regulations	A collective term referring to The Electricity Works (Environmental Impact Assessment) (Scotland) Regulations 2017 and The Marine Works (Environmental Impact Assessment) (Scotland) Regulations 2017.
Inter-array cables (IACs)	Armoured cable containing electrical and fibre optic cores which link the wind turbine generators to each other and to the offshore substation platform(s).
MachairWind Offshore Windfarm	An offshore windfarm capable of exporting around 2 GW of renewable energy to the National Electricity Transmission System. MachairWind Offshore Windfarm comprises three Development Areas: • The WDA – located on the west coast of Scotland to the northwest of Islay and west of Colonsay; • The Offshore Export Cable Corridor – a preliminary boundary extending from the WDA to mean high water springs at a landfall location near Girvan, South Ayrshire; and • The Onshore Transmission Development Area – a preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. Separate consent and licence applications will be submitted for each Development Area.
Offshore export cable	Armoured cable containing electrical cores between the offshore substation platform(s) and landfall. Offshore export cables will include bundled fibre optic cables. The offshore export cables are subject to Marine Licence applications under the Marine (Scotland) Act 2010. The portion of the offshore export cable(s) located within the WDA is assessed as part of this MachairWind WDA EIA and a marine licence application to construct, alter or improve this portion has been submitted alongside the WDA application. A separate marine licence application will be submitted for the portion of the offshore export cable(s) from the WDA boundary to mean high water Mean High Water Springs.
Offshore Export Cable Corridor (ECC)	The preliminary boundary extending from the WDA to mean high water springs near Girvan, South Ayrshire and within which the offshore export cable(s) will be located. A separate marine licence application will be submitted for the offshore export cable(s) located within the Offshore ECC.
Offshore Substation Platform (OSP)	An offshore platform with a fixed foundation located within the WDA which houses electrical equipment such as transformers, switchgear, protection and control systems, and enables the windfarm's renewable electricity to be collected via inter-array cables and exported to the National Electricity Transmission System via offshore export cables.

Term	Definition
Offshore Substation Platform (OSP) link cables	Electrical cables which link OSPs (if more than one OSP is required). These cables will include fibre optic cores or bundled fibre optic cables. OSP link cables will be wholly located within the WDA.
Onshore Transmission Development Area (OnTDA)	The preliminary boundary which extends landward from mean low water springs and includes the land required for the landfall of the offshore export cables and their route up to but not including the proposed high voltage direct current switching station which will be developed and constructed by Transmission Owner, ScottishPower Transmission. This Transmission Owner is responsible for consenting the high voltage direct current switching station. Onward connections to the National Electricity Transmission System will be consented by National Grid Electricity Transmission and ScottishPower Transmission. Where relevant, these are considered as part of cumulative effects assessment in the EIA.
The Applicant	The legal entity submitting consent applications for the MachairWind Offshore Windfarm, namely MachairWind Limited.
The Project	MachairWind Offshore Windfarm including all its Development Areas and associated infrastructure.
WDA infrastructure	The offshore generation and transmission infrastructure located within the WDA including but not limited to: WTGs, WTG fixed foundations (and associated scour protection), OSP(s), OSP fixed foundations (and associated scour protection), IACs, OSP link and offshore export cable(s) and their associated external cable protection (insofar as these are located within the WDA) and fibre optic cables.
Wind Turbine Generator (WTG)	A wind turbine generator which converts wind energy into electrical energy. Each wind turbine generator is a complex system composed of a high number of components. Typically, the main components include the rotor assembly (composed of three blades and a hub); the nacelle (containing a generator, shaft and gearbox, power electronic converter and transformer); and the tower (containing lifting equipment and the switchgear).

1 Introduction

1.1 Project Background

1. The MachairWind Offshore Windfarm ('the Project') is being developed by MachairWind Limited ('the Applicant') with separate applications being submitted for each of its three Development Areas i.e. the Windfarm Development Area (WDA), the Offshore Export Cable Corridor (ECC) and Onshore Transmission Development Area (OnTDA). This Marine Pollution Contingency Plan (MPCP) is provided in support of the application for the WDA although many of the details described will also be relevant to the Offshore ECC. The WDA is 448 km^2 and is located off the west coast of Scotland, to the northwest of Islay and west of Colonsay. The WDA infrastructure includes but is not limited to:

- Wind Turbine Generators (WTG) and associated fixed foundations and scour protection;
- Offshore Substation Platforms (OSP) and associated fixed foundations and scour protection;
- Inter-array cables and associated cable protection;
- OSP link cables and associated cable protection; and
- The portion of the offshore export cable(s) located within the WDA, and associated cable protection.

2. When operational, the WDA is anticipated to have a capacity of around 2 Gigawatts (GW) generated by up to 144 WTGs. This will have the potential to generate renewable electricity for up to two million UK homes, contributing to Scotland and the UK's transition to Net Zero and the UK's energy security in line with Government policy.

3. The earliest that WDA construction could commence is anticipated to be in the 2030's.

1.2 Purpose of this Document

4. This MPCP outlines the measures in place to effectively respond to and report marine pollution incidents during the construction, and Operation and Maintenance (O&M) phases of the Project. It applies to all WDA infrastructure and associated marine vessels involved in relevant activities. A separate MPCP will be prepared for the decommissioning phase, aligned with the final Decommissioning Programme to address marine pollution risks during that stage. Decommissioning has not been included within this plan due to regulatory uncertainties within the lifetime of the Project.

5. A separate MPCP for the Offshore ECC will also be prepared and submitted alongside the ECC consent application in due course.

6. The primary purpose of the MPCP is to safeguard the marine environment and protect human health by ensuring a prompt, coordinated response to accidental pollution incidents. The plan has been designed to include all necessary information at the application stage, eliminating the need for additional approvals before construction begins.

7. This MPCP concentrates on managing Tier 1 pollution scenarios, as defined in **Section 3.1.1**, which can be effectively handled using on-site resources. While detailed procedures for Tier 2 and Tier 3 incidents are not included, the plan outlines escalation protocols. If an incident exceeds Tier 1 capacity, the Maritime and Coastguard Agency (MCA) may assume overall control and implement the UK National Contingency Plan (NCP) for Responding to Marine Pollution scenarios (MCA, 2024).

8. If a pollution event occurs as part of a broader emergency, such as a fire or structural failure, this plan should be used alongside the Emergency Response Cooperation Plan (ERCoP) which will be produced post-consent by the Applicant. The ERCoP provides guidance for managing complex or multi-hazard situations in line with Annex 5 of Marine Guidance Note 654 (MCA, 2021).

9. Although the likelihood of a pollution scenario is considered low, maintaining a comprehensive MPCP is regarded as best practice within the offshore renewables sector. This document should be read in conjunction with the Outline Environmental Management Plan (EMP) which will outline control measures to reduce the risk of pollution incidents (**Appendix 6 Outline EMP**).

1.3 Scope

10. This this MPCP outlines:

- **Pollution prevention and response measures** for activities within the WDA, including vessels and offshore infrastructure;
- **Tier 1 incident management procedures**, including roles, responsibilities, and escalation protocols;
- **Risk assessment of potential pollution sources** and associated control measures for hydrocarbons, lubricants, hydraulic fluids, hazardous chemicals and marine debris;
- **Roles and Responsibilities** for coordinating Tier 1 responses;
- **Incident response process**, including notification, evaluation, initiation, mobilisation, and termination steps;
- **Requirements for vessel compliance**, including Shipboard Oil Pollution Emergency Plans (SOPEPs) and Oil Record Books under the International Convention for the Prevention of Pollution from Ships (MARPOL);
- **Integration with other emergency plans**, such as the ERCoP for multi-hazard events;
- **Consultation and regulatory compliance**, referencing MCA, Marine Scotland (Marine Directorate – Licencing Operations Team (MD-LOT)), and Scottish Environment Protection Agency guidance;
- **Waste management and record-keeping procedures** for pollution scenarios; and
- **Review and update provisions** to maintain alignment with best practice and regulatory requirements.

1.4 Future Updates to this MPCP

11. This MPCP has been prepared to accompany the Section 36 consent application and the Marine Licence applications for the WDA. It is intended to be a complete and self-contained document at the point of submission. The plan has been developed in line with regulatory requirements (see **Section 2**) (MD-LOT, 2025) and has been prepared to provide sufficient detail at the application stage, such that no further approvals are anticipated prior to the commencement of construction. Nevertheless, to incorporate evolving best practice in marine pollution prevention and response, this MPCP will be refined and updated where considered necessary by the Applicant to ensure continued compliance and effectiveness.

1.4.1 Consent Conditions

12. At the time of submitting this MPCP the specific consent conditions have not yet been issued. It is anticipated, however, that the Section 36 consent and Marine Licences will include conditions requiring the implementation of appropriate pollution prevention and response measures.

13. **Table 1.1** is currently provided as a placeholder and will be populated once the final consents and associated conditions are confirmed. When complete, **Table 1.1** will demonstrate how each consent condition has been addressed within this MPCP.

Table 1.1 Consent conditions to be discharged by the MPCP

Consent	Consent Condition Reference	Consent Condition Summary	Reference to Relevant Section of this Marine Pollution Contingency Plan (MPCP)
(To be completed post-consent)	(To be completed post-consent)	(To be completed post-consent)	(To be completed post-consent)
(To be completed post-consent)	(To be completed post-consent)	(To be completed post-consent)	(To be completed post-consent)

2 Legislation, Policy and Guidance

14. This plan has been prepared in accordance with the Scottish Government Marine Directorate's guidance on mitigation and monitoring plans, specifically the requirements for Marine Pollution Contingency Plans for offshore renewable energy projects (MD-LOT, 2025).

15. This plan has also been informed by several key pieces of legislation, policy, and guidance relevant to maritime pollution prevention and control. Annex III provides a summary of legislation, policy, and guidance relevant to this MPCP.

3 Potential Pollution Sources and Control Measures

3.1 Pollution Sources and Risk Assessment

3.1.1 Tier Classification

16. Pollution responses are classified into three tiers, determined by the size and severity of the pollution scenario; the resources required for an effective response; and the potential impact on environmental and human receptors. This tiered approach ensures that responses are scalable and proportionate to the magnitude of the pollution scenario, enabling prompt and effective measures to minimise environmental and operational impacts. The tiers are defined in **Table 3.1**.

Table 3.1 Pollution scenario tier definitions

Offshore Incident Categories
Tier 1: Local (response within the capability of on-site resources)
Small, localised pollution events that can be successfully controlled by onsite or readily deployed resources. A Tier 1 pollution event is not likely to require intervention by resources outside of the project and its Contractors, an external incident response organisation or external authorities, except for notification purposes.
Tier 2: Regional (exceeds on-site capability, but within the capability of external / third party resources)
Medium sized pollution event that will be handled by the nominated personnel within this plan and a Contractor or other external assistance as nominated within this plan, i.e. the immediate resources available are insufficient to cope with the incident. A Tier 2 incident may involve Local Government / MCA and could be subject to Government controls.
Tier 3: National (requires national resources co-ordinated by the MCA)
Large scale pollution event that will require full involvement of other authorities and possible mobilisation of Tier 3 and national stockpiles. A Tier 3 incident is beyond the capability of both local and regional resources.

3.1.2 Potential Pollution Scenarios and Control Measures

17. **Table 3.2** presents the potential pollution scenarios and associated control measures identified for both the construction and O&M phases of the WDA. This information is based on a detailed assessment of anticipated activities, vessel presence, pollutant types, and the environmental context of the WDA.

18. The pollution scenarios and control measures in **Table 3.2** apply across both the construction and the O&M phases. To ensure a comprehensive and proportionate risk assessment, the likelihood of each scenario with control measures in place has been evaluated alongside its response classification tier. This approach avoids duplicating scenarios by phase while maintaining consistency in risk management.

19. The assessment of potential pollution scenarios and control measures in **Table 3.2** considers a range of influencing factors to characterise pollution risk and define planned response requirements, including:

- The number and type of vessel calls to, and vessels transiting through, the WDA;
- The type and volume of pollutants anticipated, including fuels, lubricants, coolants, hydraulic fluids and marine debris;
- The expected frequency and potential size of pollution scenarios, particularly from high-risk activities such as refuelling;
- Identification of specific areas within the WDA where pollution risk is elevated, such as refuelling stations;
- The likely consequences of pollution scenarios, including operational disruption, environmental damage, and health and safety risks;
- The location of sensitive environmental receptors, including protected habitats and designated marine areas such as Special Areas of Conservation, Special Protection Areas, and Nature Conservation Marine Protected Areas;
- Predicted pollution movement based on prevailing wind, current, and tidal conditions; and
- The potential effects of released pollutants, particularly oil, on marine and coastal resources.

20. The primary sources of potential pollutants associated with the WDA are anticipated to originate from WTGs, OSPs and construction and O&M vessels. The volume or quantity of hazardous substances (e.g. oil, coolants, etc.) present will vary depending on the design of the infrastructure or asset.

21. Within WTGs, substances typically present which have the potential to pollute the marine environment include:

- Yaw grease;
- Yaw gear oil;
- Main bearing grease;
- Transformer (ester oil);
- Cooling fluid (water/glycol);
- Hydraulic oil;
- Pitch lubrication (grease);
- Pitch system hydraulic accumulators (nitrogen);
- Pitch gearbox oil; and
- Gearbox oil.

22. In addition to liquid pollutants, WTGs present a potential risk of marine debris, particularly in the event of blade failure. Blade fragments can pose environmental hazards and navigational risks if released into the sea.

23. Within the OSP, substances typically present which have the potential to pollute the marine environment include:

- Diesel fuel for the emergency generators (in diesel storage tanks);
- Oil for the transformers (oil will be monitored and filtered, top-up may be required);
- Engine oil;
- Glycol;
- Sewage and grey water; and
- Lead acid contained within batteries.

24. Construction and O&M vessels use, store, and handle substances which have the potential to pollute the marine environment such as:

- Marine Gas Oil (MGO);
- Intermediate Fuel Oil (IFO);
- Lubricants;
- Hydraulic fluids; and
- Operational products such as cleaning agents and anti-corrosion applications.

Table 3.2 Assessment of potential pollution incidents and control measures (construction, and O&M phases)

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
Hydrocarbons (MGOs and IFOs)	Vessel Refuelling Loss of fuel during vessel to vessel refuelling at sea	Low	Tier 2	To minimise the risk of hydrocarbon pollution during the construction and O&M phases, the following best practice measures will be implemented by all Contractors and Subcontractors. Offshore Refuelling Where offshore refuelling is unavoidable for vessels unable to leave station due to operational constraints, the following controls will apply: • Refuelling will be planned in advance, including preparation and review of task-specific risk assessment and method statements (RAMS), fuel transfer planning tools, and checklists; • Contingency equipment including, but not limited to: scupper plugs, drain covers, drip trays, save-alls must be deployed, and emergency spill equipment and materials must be readily available and sufficient to contain and clean up any accidental spill; • Restricted to daylight hours and favourable weather conditions wherever practicable; and • Supervised by a responsible person (e.g., Chief Engineer) on board, following the vessel's approved fuel transfer procedures and checklists. Bunkering A bunker plan will be prepared and displayed in the Bridge and Machinery Control Room. A pre-bunkering meeting will be held with all involved personnel to review: • The bunker plan and any anticipated changes; • Task-specific risk assessment and emergency response actions; • Assigned roles and responsibilities; and • Bunkering checklist items. Only hoses fitted with non-return valves will be used for offshore fuel or fluid transfers. Bunkering will be restricted to daylight hours and favourable weather conditions wherever practicable. A continuous visual lookout will be maintained throughout the bunkering process to monitor hose integrity and detect any leakage immediately.
	Equipment Refuelling Loss of fuel during refuelling of equipment (on vessel or on WDA Infrastructure).	Low	Tier 1	

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
				Pollution Prevention During Normal Operations Pollution kits will be available onboard all vessels, and personnel will be trained and competent in their use. All fuel, oil, and chemical storage tanks and/or containers associated with equipment will be bunded to 110% of their total volume to contain leaks and spills. Preventative measures will include trays beneath oil pumps, heaters, and similar equipment, as well as oil gutter ways to prevent fuel oil from entering bilge areas. These containment systems will be regularly inspected, drained, and cleaned. Oil pipes and fittings will be routinely inspected for leaks, wear, or fatigue, with prompt repair or replacement where issues are detected. Regulatory Compliance and Documentation Vessels over 400 Gross Tonnes (GT) will: • Carry, maintain, and implement a SOPEP in accordance with MARPOL Annex I, Regulation 37, and the Merchant Shipping (Prevention of Pollution by Oil) Regulations 2010; • Maintain an Oil Record Book in line with MARPOL Annex I, Regulation 17, which includes entries for: • Fuel and oil bunkering operations; • Disposal of sludge (oil residues); • Discharge or disposal of machinery space bilge water; • Condition of oil discharge monitoring and control systems; • Accidental or exceptional discharges of oil; and • Additional operational procedures and general remarks. Personnel Training and Awareness All personnel involved in hydrocarbon handling or refuelling will receive training in: • Pollution prevention awareness; • Safe handling of hydrocarbons and use of pollution response equipment; and • Emergency response procedures and escalation protocols.

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
				Safety Data Sheets (SDS) and Control of Substances Hazardous to Health (COSHH) Compliance All hazardous substances will have up-to-date SDSs detailing safe handling, storage requirements, and pollution response procedures. COSHH assessments will also be undertaken for project-specific chemicals to ensure regulatory compliance and safe working practices.
Hydrocarbons (MGOs and IFOs)	Marine Vessel Incident Vessel to Vessel Collision Loss of fuel from collision between two vessels. Vessel to Structure Allision Loss of fuel from allision between a vessel and a structure (e.g., FOU or WTG). Vessel Stranding/Grounding	Very Low	Tier 2 (Possibly Tier 3)	Collision and Allision Risk Management To reduce the risk of vessel-to-vessel collisions, vessel-to-structure allisions, or vessel stranding/grounding during the construction and O&M phases, the Applicant will implement and adhere to a comprehensive suite of navigational safety measures. These measures will be verified by in person inspection in line with the project Vessel Entry Procedure, and a suite of procedures outlined in **Appendix 13 Outline Vessel Management Plan and Navigational Safety Plan**. Navigational Controls All project vessels will operate in full compliance with project-specific navigational protocols, exclusion zones, and routing measures. These requirements will be detailed in the Navigational Safety and Vessel Management Plan, which will be developed and submitted post-consent once construction methodologies, vessel types, and marine operations are confirmed. Marine Coordination A centralised Marine Coordination System (MCS) will be established to oversee, monitor, and coordinate vessel movements within the WDA. The MCS will be responsible for: • Vessel tracking and monitoring**:** Recording all vessel entries and departures within the WDA; • Personnel management**:** Coordinating the movement of personnel to and from the WDA;
Lubricating oil		Very Low	Tier 2	
Hydraulic oil		Very Low	Tier 1	

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
Chemicals	Loss of fuel due to vessel stranding/grounding	Very Low	Tier 1	• Conflict prevention: Identifying and mitigating potential conflicts between simultaneous operations (e.g., Offshore ECC activities); • Communication and coordination: Maintaining clear communication between the Marine Coordinator (or delegated personnel), vessel crews, and relevant stakeholders; • Safety compliance: Ensuring all marine operations comply with applicable safety regulations and procedures; and • Resource management: Optimising resource allocation during construction and O&M phases to support efficient project delivery. Regulatory Compliance for Collision Risk Management In addition to project-specific measures, all vessels will comply with international conventions implemented through UK legislation. International Regulations for Preventing Collisions at Sea (COLREGs) (1972) COLREGs are transposed into UK law via the Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 (as amended) and enforced by the MCA. International Convention for the Safety of Life at Sea (SOLAS), Chapter V, Regulation 19 This regulation requires certain vessel classes to carry Automatic Identification Systems (AIS) to support safe navigation and collision avoidance. In the UK, these requirements are implemented through the Merchant Shipping (Safety of Navigation) Regulations 2002. AIS carriage is mandatory for: • All commercial vessels ≥300 GT on international voyages; • Cargo vessels ≥500 GT not engaged on international voyages; and • All passenger vessels, regardless of size. Although AIS is not legally required for all vessels in UK waters, many smaller vessels voluntarily carry AIS to enhance safety. AIS enables: • Continuous transmission of real-time vessel data (position, speed, course, identity); • Improved situational awareness and decision-making for collision avoidance; and • Integration with the MCS for centralised monitoring and management.

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
				International Maritime Dangerous Goods (IMDG) Code under the Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations 1997 UK legislation gives legal effect to the IMDG Code, setting standards for the carriage of dangerous goods and marine pollutants in packaged or bulk form aboard UK ships and in UK waters. All dangerous substances carried during construction, operations, or maintenance have to comply with internationally accepted packing, stowage, segregation, and documentation requirements, and are integrated into vessel safety and environmental management protocols. SDS and COSHH Compliance All hazardous substances will have up-to-date SDSs detailing safe handling, storage, and pollution response procedures. COSHH assessments will be completed for project-specific chemicals to ensure compliance and safe working practices.
Hydrocarbons (MGOs and IFOs)	Release of fuel, oil or chemicals due to failure of plant or equipment	Low	Tier 1	To mitigate the potential for pollutant release resulting from plant and/or equipment failure, the following measures will be implemented and maintained throughout all offshore activities. Equipment Operation and Maintenance • All plant and equipment will be operated and maintained in accordance with manufacturer specifications, legal requirements, and recognised industry best practice; • Planned Preventative Maintenance (PPM) schedules will be followed to ensure equipment remains in good working condition; and • All PPM activities will be documented and logged to demonstrate compliance and support auditing processes. Personnel Competency • Only trained, competent, and qualified personnel will operate plant and equipment; and • Operation and maintenance teams will receive training in pollution prevention, correct equipment handling, and emergency response procedures relevant to substances in use.
Lubricating oil		Low	Tier 1	

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
Hydraulic oil		Low	Tier 1	<u>Bunds and Secondary Containment</u> • All fuel, oil, and chemical storage tanks or containers will be bunded to at least 110% of the largest single tank volume, or 25% of the total stored volume (whichever is greater) in line with best practice guidance; and • Bunds and secondary containment systems will be inspected regularly to ensure they provide effective containment in the event of leaks or pollution scenarios. <u>Leak Prevention and Monitoring Systems</u> • Equipment such as oil pumps, heaters, fuel-handling systems, hydraulic systems, and chemical dosing units will be fitted with drip trays, oil gutter ways, or other suitable containment measures to prevent pollutants entering bilge areas or the marine environment; and • These systems will be routinely inspected, cleaned, and drained as necessary to maintain functionality. <u>Inspection of Lines and Fittings</u> • Fuel, oil, hydraulic, and chemical lines, including hoses and fittings, will be regularly inspected for signs of wear, damage, or fatigue; • Any defects or potential sources of leakage will be addressed immediately, with repairs or replacements carried out promptly; and • Records of all inspections and corrective actions will be maintained for compliance and audit purposes.
Chemicals		Low	Tier 1	
Hydrocarbons (MGOs and IFOs)	Small localised pollution spills scenarios during equipment operation.	Low	Tier 1	To mitigate the potential for pollutant release during equipment use, the following measures will be implemented and maintained throughout all offshore activities. <u>Task Planning and Risk Assessment</u> All activities involving hydrocarbons, lubricants, or hydraulic systems will be supported by task-specific RAMS. Risk controls will be proportionate to the type and quantity of substances involved in each activity.

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
Lubricating oil		Low	Tier 1	SDS and COSHH Compliance All hazardous substances will have up-to-date SDSs detailing safe handling, storage requirements, and pollution response procedures. COSHH assessments will also be completed for project-specific chemicals to ensure regulatory compliance and safe working practices.
Hydraulic oil		Low	Tier 1	Training and Competence All personnel will be trained and competent in proactive pollution prevention, safe equipment operation, and the correct use of pollution response equipment. Operators will be familiar with the hazards associated with substances in use, as identified in COSHH assessments. This includes understanding required Personal Protective Equipment (PPE), safe handling procedures, and knowing the location and proper use of pollution containment and response equipment. Pollution Response Equipment Appropriate pollution kits will be clearly marked, easily accessible at key work locations, and routinely inspected. Equipment integrity and Monitoring Equipment in active use will be regularly checked for leaks, wear, and damage. Drip trays and other local containment measures will be used wherever practical to capture small-scale leakages. Bilge Protection Preventive measures will be implemented to stop pollutants from entering the bilge. These systems will undergo routine inspection, draining, and cleaning to ensure they remain fully operational.
Chemicals	Spillage of paints, paint thinners, solvents, and	Low	Tier 1	To mitigate the risk of accidental chemical release during use, the following controls will be applied and maintained throughout all offshore operations.

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
	cleaning fluids during use.			Risk Assessments and Method Statements Task specific RAMS will be prepared, reviewed, and adhered to in order to identify and mitigate chemical pollution risks. Personal Training and Competency All personnel will receive training on the safe handling and use of chemicals, pollution prevention techniques, and the correct deployment of pollution response equipment, including pollution kits. Training will cover the hazards associated with specific substances, as well as the location and proper use of containment and response equipment available on site. Training and competency will also be checked during Vessel Assurance. SDS and COSHH Compliance Every hazardous substance will have an up-to-date SDS detailing safe handling, storage, and pollution response procedures. COSHH assessments will be completed for all project-specific chemicals to ensure regulatory compliance and safe working practices. PPE Personnel handling chemicals will be provided with and required to wear appropriate PPE, as specified in SDS and COSHH assessments. Compliance with PPE requirements will reduce exposure risks and maintain safe working conditions. Chemical Storage and Segregation Hazardous chemicals will be stored in designated, clearly marked areas with appropriate segregation to prevent cross-contamination or uncontrolled reactions. Storage areas will include secondary containment capable of holding at least 110% of the largest container's volume or 25% of the total stored volume, whichever is greater. Incompatible substances will be stored separately; where both liquids and powders share a cabinet or bund, powders will be placed above liquids to minimize contamination risk in case of leaks. Pollution Response Preparedness

Potential Pollutant	Pollution Scenarios	Likelihood with Control Measures in Place	Response Classification System Tier	Control Measures
				Pollution kits and other suitable response equipment will be readily accessible and maintained in good condition. Equipment will be checked regularly to ensure it is functional and appropriate for the chemicals used on site.
Marine debris	Loss of Blade Material to Sea Loss of composite blade fragments and associated materials during construction and operation	Low	Tier 1	To mitigate the risk of marine debris entering the environment following a WTG blade failure, the following measures will be implemented and maintained throughout all offshore operations: Inspection and Monitoring Routine inspections will be used to detect early signs of blade damage or deterioration. The Applicant will implement appropriate quality assurance measures in accordance with their quality management system. This may include, but is not limited to the development and implementation of an Inspection and Test Plan (ITP) to ensure the quality and integrity of components and supplies at relevant points of the project lifecycle. This plan will define inspection points, acceptance criteria, and verification processes to maintain compliance with project standards. Containment and Recovery In the event of blade failure, containment measures will be deployed where safe and practicable to prevent debris from dispersing. Recovery operations will prioritise larger fragments to minimise environmental impact and navigational hazards. Waste Management and Disposal Recovered blade material will be stored securely and transported to licensed facilities for recycling or disposal in compliance with environmental regulations. Documentation of waste handling will be maintained for audit purposes.

4 Roles and Responsibilities

4.1 Tier 1 Roles and Responsibilities

25. **Table 4.1** outlines the roles and responsibilities of key project personnel in relation to this MPCP.

Table 4.1 Roles and responsibilities of key personnel relevant to this MPCP

Role	Responsibility
Applicant	The Applicant will require through contractual obligations, that all Contractors and Subcontractors take full responsibility for preventing and responding to pollution incidents arising from their activities associated with the WDA. The Applicant is also accountable for ensuring that all contracted parties understand and comply with the requirements of this MPCP and that appropriate pollution prevention and response measures are implemented throughout the delivery of works.
Contractors/Subcontractors	Key responsibilities in relation to this MPCP include: • The Contractor holds primary responsibility for responding to incidents. The response must follow the Contractor's own procedures and/or those specified in relevant consent plans; • Ensure adequate resources and processes are in place to comply with this MPCP and manage environmental impacts, including those of their Subcontractors; • Notify the Applicant of any environmental incidents; • Develop Environmental Management Plans (EMPs) in line with MPCP requirements for Applicant review; • During Tier 1 incidents, ensure adherence to MPCP requirements, EMPs, Emergency Response Plan (ERP) and method statements; and • Maintain accurate records of site activities.
First Responder – First Level Escalation (Vessel Master, Platform Manager, or Work Party Supervisor)	Key responsibilities in relation to this MPCP include: • Initiating the emergency response process; • Notifying the Marine Control Centre (MCC) that an incident has occurred; • Contacting the Emergency Services, if required; and • Acting as the on-scene coordinator until relieved by a member of Construction Management.
Emergency Coordinator – Second Level Escalation (Tier 2 / 3 Incidents Only) (Construction Manager, Deputy, or appropriate Delegate)	Key responsibilities in relation to this MPCP include: • Perform role of Emergency Response Team Leader, maintain overall control, and delegate tasks; • Assign Emergency Response Team and support roles; • Assist with the coordination of emergency response activities in the construction area, and assist the First Responder; • Assess and monitor the incident, and provide regular updates to the Emergency Response (ER) Team and ER Support Team; • Escalate incidents to Tier 2 or Tier 3 when necessary; and • Contact Emergency Services if required (and not already done by the First Responder).
Emergency Response Team (Tier 2 / 3 Incidents Only) (Comprised of, but not limited to: Construction Manager, Offshore Construction Manager, Offshore Installation Managers (OIM), Platform Managers, HV Safety Representatives)	Key responsibilities in relation to this MPCP include: • Act as the single point of contact for the Marine Control Centre; • Manage, assist, and monitor activities; • Set up and maintain action / comms board; • Update ER Support Team with emergency status; • Primary contact with vessel / incident; • Liaise with OIM to obtain / provide information to the windfarm; and • Compile incident log.

Role	Responsibility
Emergency Response Support Team (Tier 2 / 3 Incidents Only)	Key responsibilities in relation to this MPCP include: • Providing additional support to manage the incident, including assignment of additional resources/budget to facilitate the implementation of any recovery measure(s); • Update ScottishPower Renewables/Iberdrola corporate organisations as required; • Maintaining as accurately as possible, a 'real time' picture of events; • Providing accurate and timely information to Contractors, emergency services, regulators, and relevant authorities or stakeholders; • Provide accurate, timely and approved information for release to the media and to manage any media visitors; • Support with incident investigation; and • Supporting the return of the situation to normal in as quick a time as practicable.
Health and Safety, and Environment Managers	Key responsibilities in relation to this MPCP include: • Supporting the subsequent incident investigation, closure of actions, and sharing of lessons learnt associated with the incident, as required.
Marine Coordinator (appointed by the Applicant)	Key responsibilities in relation to this MPCP include: • Manage vessel movements; and • During a Tier 1 incident, liaise with Vessel Masters, notify nearby vessels, and coordinate additional responses.
Applicant's Consents Lead	Key responsibilities in relation to this MPCP include: • Where required, support with incident-related reporting, returns, and notifications to Marine Scotland (MD-LOT) and relevant stakeholders; and • Act as the primary contact for statutory bodies and stakeholders.

4.1.1 Marine Coordination Centre

26. Before construction begins, a dedicated MCC will be established to oversee and manage offshore activities. The MCC will act as the central hub for coordinating vessel movements, personnel transfers, and logistical operations within the WDA. A Marine Coordinator will be appointed by the Applicant to operate the MCC and will hold overall responsibility for daily marine operations. This role will also serve as the primary point of contact for marine-related incidents and ensure the effective implementation of this MPCP.

27. In the event of a Tier 1 pollution scenario, the Marine Coordination function will undertake the following actions:

- **Initial Notification**: The Marine Coordinator will be informed immediately by the Vessel Master. For non-vessel-based pollution, notification will come directly from the first responder or pollution observer;
- **Incident Categorisation**: In consultation with the Vessel Master and the Project Construction or Site Management Team, the Marine Coordinator will assess the situation and classify the incident as Tier 1, Tier 2, or Tier 3 to ensure an appropriately scaled response;
- **Internal Communication**: The Marine Coordinator will notify the Applicant's Environment Manager and provide ongoing updates on the situation;
- **Coordination of Response**: Roles and responsibilities will be clearly defined, personnel and resources allocated, and actions coordinated according to the scale and nature of the incident;
- **Communication Management**: Dedicated communication personnel will be assigned to relay critical information between the incident site and the MCC;

- **Escalation/De-escalation**: Where necessary, the response will be escalated by activating contracted Tier 2 or Tier 3 resources or involving relevant authorities. De-escalation will occur as the incident stabilises;
- **Response Termination**: Support will be provided to formally conclude the incident response; and
- **Decision-Making Documentation**: Detailed records of all decisions, actions, communications, and changes in incident status will be maintained to ensure traceability and support post-incident reviews.

28. Not all functions listed above will apply to every Tier 1 incident. The response will be tailored on an incident-by-incident basis.

4.1.2 Incident Reporting Procedure

29. The Applicant is responsible for keeping the MD-LOT informed of any incidents that may be of public interest. The Applicants requirements for incident management and reporting are set out in the Health, Safety and Environmental Contractor Minimum Requirements (OFHS-GSC-000001) and specify:

30. *"all accidents/incidents (safety and environmental) must be reported verbally to the Employer representative immediately within 30 minutes and followed up with a brief written statement report/accident form within 24 hours. A full report must be received no later than 7 days from the incident"*

31. All Contractors must have:

- A system for investigating incidents and conducting root cause analysis; and
- A process for sharing all findings and investigation reports with the Applicant, including interim reports where investigations exceed two weeks.

32. Where deemed necessary based on the nature, scale, or impact of the incident, the Applicant reserves the right to conduct its own investigation. The Contractor will provide full support for this process.

33. Each Contractor will also maintain a project-specific ERP tailored to the scope of their work. These ERPs must align with the overarching ERCoP and MPCP.

4.1.3 UK NCP Requirements

34. The UK NCP (MCA, 2024) sets out national-level procedures for responding to the release of oil, hazardous and noxious substances, inert materials, or combinations thereof that could impact wildlife, public health, and both local and national economies across marine, coastal, and terrestrial environments. The plan is primarily intended for large-scale incidents of national significance, classified as Tier 2 or Tier 3 pollution incidents. However, if a Tier 1 incident exceeds the Project's internal response capacity, particularly in terms of counter-pollution equipment and personnel, escalation to Tier 2 or Tier 3 resources may be required.

35. In such cases, additional resources should be sourced from other accredited pollution response contractors or, where necessary, through national assets coordinated by the MCA. Further details on requesting and deploying national pollution response assets are provided in Section 9.6.1 of the NCP: National Assets, Resources and Response Options (MCA, 2024).

36. The NCP also identifies four potential response theatres for maritime incidents, which may operate independently or in parallel, including:

- His Majesty's Coastguard, responsible for managing search and rescue (SAR) operations;
- The MCA, responsible for overseeing the 'at sea' response;
- The UK Secretary of State's Representative for Maritime Salvage and Intervention, responsible for overseeing the source/containment/salvage response; and
- The Local Authority or private landowner, responsible for responding to/overseeing the shoreline response.

37. The MCA is responsible for activating the NCP (MCA, 2024). In the event of a significant release from a vessel or offshore installation, the primary responder must immediately report the incident by telephone to the nearest MCA Coastguard Maritime Rescue Coordination Centre (MRCC). The MRCC will then contact the vessel or installation to confirm details and coordinate an appropriate response.

38. Following initial notification, the MRCC will initiate any required SAR operations. It will also inform the MCA Duty Counter Pollution and Salvage Officer (DCPSO), MCA Headquarters, and the Marine Accident Investigation Branch of any pollution scenario or significant pollution risk. The DCPSO determines whether a regional or national response is necessary, as the NCP does not specify criteria for triggering different response levels.

39. If a regional or national response is activated, the MCA may deploy multiple response units and establish dedicated centres, such as the Marine Response Centre or Shoreline Response Centre. These units will work alongside and support pollution response activities, including those coordinated through the MCC established by the Applicant.

5 Pollution Scenario and Response Procedure

40. Any pollution scenario within the marine environment, regardless of size or source, must be reported in accordance with the procedures below whenever a Contractor or Subcontractor is working on the Project.

41. The priority is to safeguard personnel, the environment, assets, and prevent escalation. If the incident forms part of a wider emergency (e.g., fire, explosion, structural failure), the ERCoP (to be produced post-consent) must also be followed.

42. This section outlines the structured response process that will be implemented under this MPCP. **Sections 5.4** to **5.8** provide detailed guidance on each stage of the response in a clear, step-by-step format. This ensures that all essential actions are documented and actionable by the relevant personnel.

5.1 Incidents Originating from a Vessel

43. When a pollution scenario occurs from a vessel during construction or O&M activities, the observer must notify the Vessel Master immediately. The Vessel Master will then report the incident to the MCC who shall in turn contact the relevant Project Construction or Site Management Team. Upon receipt of the notification, the Applicants Environment Manager shall notify the MCA and MD-LOT via telephone (where possible) and confirm relevant details via email.

44. For incidents relating to oil or chemical spills, the Contractor or Subcontractor responsible for the vessel will activate the SOPEP and assume primary responsibility for managing the incident. This includes maintaining ongoing status updates and initiating clean-up operations using onboard

resources. If additional capacity is required, the Contractor will request support from a specialist pollution response provider.

45. In the unlikely event that the incident exceeds Tier 1 capability, the MCA may take control and implement the UK NCP.

5.2 Incidents Originating from an Offshore Installation

46. If a pollution event originates from an offshore installation such as a WTG or OSP, the observer must notify the MCC immediately who shall in turn report the incident to the relevant Project Construction or Site Management Team. Upon receipt of the notification, the Applicants Environment Manager shall notify the MCA and MD-LOT via telephone (where possible) and confirm relevant details via email.

47. The response to a Tier 1 pollution event would be managed by the Contractor, in accordance with the relevant emergency response procedures for the asset – this would typically involve the deployment of pollution response equipment held on the asset or support vessels. In the unlikely event that the incident exceeds Tier 1 capability, the MCA may take control and implement the UK NCP.

5.3 Incidents Within a Port or Harbour

48. For pollution scenarios occurring within a port or harbour, the Contractor or Subcontractor must immediately notify the MCC who shall in turn report the incident to the relevant Project Construction or Site Management Team. Upon receipt of the notification, the Applicants Environment Manager shall notify the MCA, MD-LOT, and relevant Port or Harbour Authority via telephone (where possible) and confirm relevant details via email. The Contractor or Subcontractor responsible for the pollution incident must follow all local procedures required of them by the Port or Harbour Authority.

5.4 Notification

49. To enable an accurate assessment and appropriate response, the first responder (pollution observer) must provide the Marine Coordinator with an incident log detailing date, time and location of observation, source and cause of pollution, estimates quantity and type of pollution, description of pollution and the weather/sea conditions (use incident log sheet in **Annex I**).

50. For vessel-based pollution, this information will be relayed via the Vessel Master; for non-vessel incidents, it will be provided directly to the Marine Coordinator.

51. If safe to do so, the first responder should:

- Warn all personnel in the vicinity of the potential hazard;
- Remain near the incident and monitor its development; and
- Take reasonable steps to contain or reduce the pollution.

52. A detailed log of all decisions and actions must be maintained from the moment the incident is reported. This ensures traceability and supports post-incident review.

5.5 Evaluation

53. Using the guidance detailed in **Section 5.4** and **Table 5.1**, the Applicants Construction or Site Management Team will conduct an initial assessment of the pollution scenario and determine whether external support is required. If the incident exceeds internal response capabilities, immediate escalation to the appropriate tier will be initiated.

54. **Table 5.1** provides guidance for determining the appropriate tier response. Key factors influencing response actions include:

- Type and volume of the released substance;
- Persistence and behaviour of the pollutant;
- Likelihood of natural dispersion;
- Seasonal conditions, weather, and sea state;
- Location and environmental sensitivities;
- Availability of resources; and
- Potential for escalation.

55. Depending on the type and quantity of the pollution, active clean-up may not be required if natural dispersion is expected to reduce pollutant levels to an acceptable threshold.

Table 5.1 Tier response selection guide

Tier Level	Response Level	Tier Selection Considerations
Tier 1	Response within the capability of on-site resources	• Pollution likely to disperse naturally in a short time frame; • Localised and minor environmental impact; • Involves light oils, diesel, or rapidly evaporating chemicals; • Debris event posing a limited risk to the environment or other sea users; • Escalation unlikely; and • Release is not ongoing.
Tier 2	Response exceeds on-site capability, but is within the capability of external / third party resources	• Oil spill contractor resource required; • Ongoing release but of a restricted volume of pollutant; • Debris event posing a moderate risk to the environment or other sea users; • Larger diesel spills; and • Escalation potential exists.
Tier 3	Response exceeds external / third party resource capability, and national / international resource	• Government agency intervention required; • Ongoing large-scale release of pollutant; • Debris event posing a significant risk to the environment or other sea users; and • High risk of significant environmental impact on either the shoreline or marine environment.

5.6 Initiation

56. If a response beyond Tier 1 is required, the Applicant will consider setting up a Command Centre at the WDA MCC or another suitable location. Refer to **Section 4.1** for Tier 2/3 Command Structure roles and responsibilities.

57. To determine whether active intervention is necessary, the following factors will be assessed:

- Whether key environmental or operational resources are at risk, or if natural dispersion is likely without intervention;
- Whether a response is feasible and effective under current conditions; and
- Whether the scale or impact of the incident warrants escalation beyond Tier 1.

5.7 Response Strategy

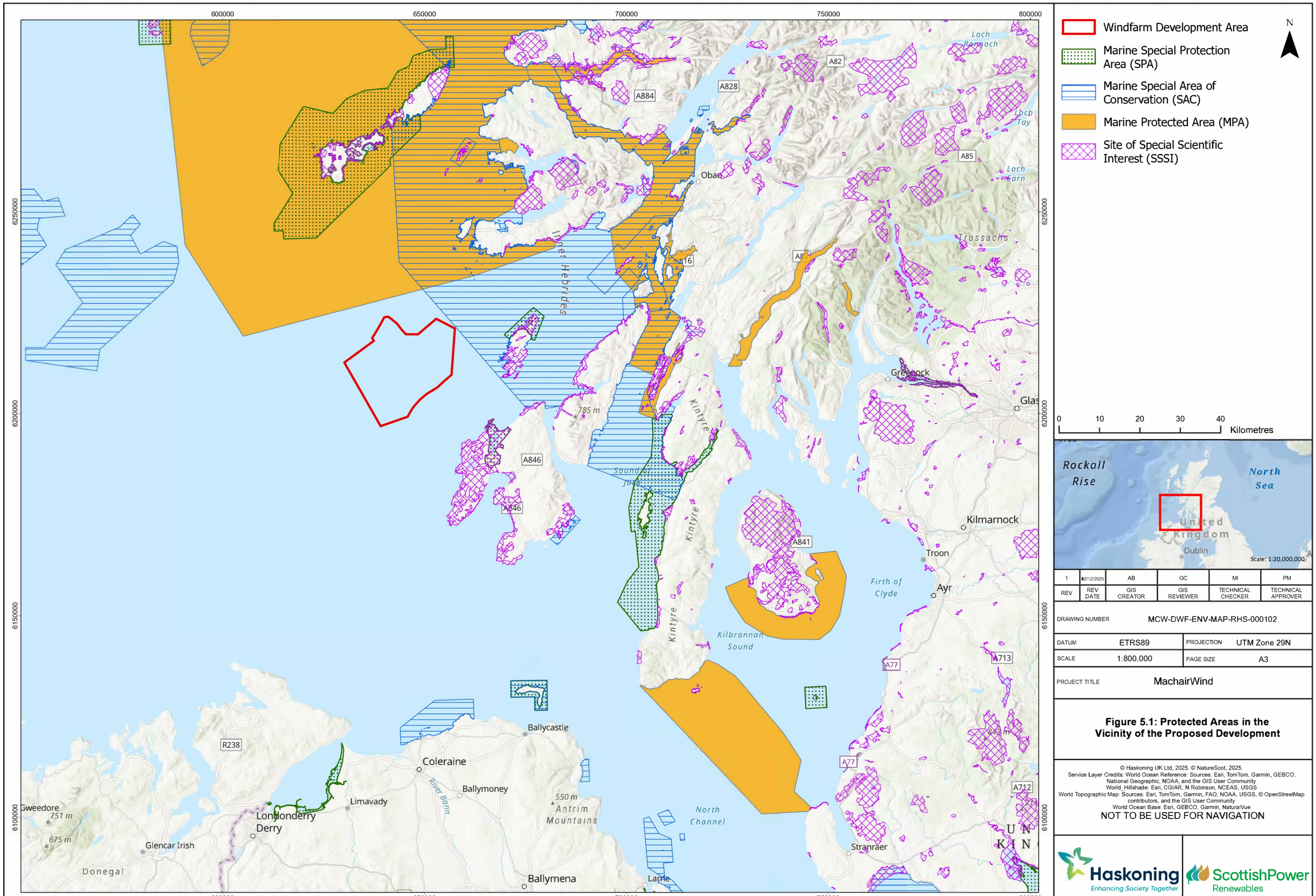
58. **Table 5.2** below sets out the response strategy for each tier of incident.

Table 5.2 General response strategies according to pollution tier and pollutant type

Tier Level	Response Strategy		
	Non-Persistent Oil (Marine Gas Oil (MGO) and Diesel)	**Persistent Oil (Intermediate Fuel Oil (IFO), lubricating oils, and hydraulic oils)**	**Debris Event**
Tier 1	• If conditions allow and it is safe to do so, monitor the pollution using a support vessel. To aid natural dispersion, the standby vessel may agitate the slick by steaming through it at speed, using propeller wash (prop-wash) to break up the pollutant.	• If conditions allow and it is safe to do so, monitor the pollution using a support vessel. To aid natural dispersion, the standby vessel may agitate the slick by steaming through it at speed, using propeller wash (prop-wash) to break up the pollutant; • Recover pollutants using small booms and absorbents where feasible; and • If the pollution exceeds Tier 1 capacity, escalate immediately to Tier 2.	• If conditions allow and it is safe to do so, monitor the debris using a support vessel; • Deploy containment measures (e.g., nets or booms) where practicable to prevent further dispersal; • Recover larger debris fragments using vessel cranes or lifting equipment where feasible; and • If the debris exceeds Tier 1 capacity, escalate immediately to Tier 2.
Tier 2	• Consult specialist support and follow relevant advice which may include: a. Continued monitoring of pollution; b. Natural Dispersion; and c. Dispersant application (if safety or environmentally sensitive receptors are at risk, following consultation with relevant authorities).	• Consult specialist support and follow relevant advice which may include: a. Continued monitoring of pollution; b. Natural Dispersion; c. Mechanical recovery; d. Deployment of absorbents; e. Shoreline containment and recovery; and f. Dispersant application (following consultation with relevant authorities).	• Continued monitoring of debris spread; • Deployment of additional recovery vessels and equipment; • Mechanical recovery of large fragments; • Shoreline protection measures if debris is drifting toward sensitive areas; and • Coordination with waste management contractors for secure storage and transport.
Tier 3	• For Tier 3 incidents, it is anticipated that the MCA will assume command, and response activities and assets will be coordinated by them; and • The Contractor responsible for the pollution incident will be required to provide on-site resources, if requested by the MCA.	• For Tier 3 incidents, it is anticipated that the MCA will assume command, and response activities and assets will be coordinated by them; and • The Contractor responsible for the pollution incident will be required to provide on-site resources, if requested by the MCA.	• For Tier 3 incidents, it is anticipated that the MCA will assume command, and response activities and assets will be coordinated by them; and • The Contractor responsible for the pollution incident will be required to provide on-site

Tier Level	Response Strategy		
	Non-Persistent Oil (Marine Gas Oil (MGO) and Diesel)	Persistent Oil (Intermediate Fuel Oil (IFO), lubricating oils, and hydraulic oils)	Debris Event
			resources, if requested by the MCA.

59. **Figure 5.1** highlights the environmental sensitivities surrounding the Proposed Development. These factors must be carefully considered during any pollution response, whether Tier 1, Tier 2, or Tier 3, to minimise ecological impact and comply with regulatory requirements.



REV	REV DATE	GIS CREATOR	GIS REVIEWER	TECHNICAL CHECKER	TECHNICAL APPROVER
1	02/12/2025	AB	GC	MI	PM

DRAWING NUMBER	MCW-DWF-ENV-MAP-RHS-000102		
DATUM	ETRS89	PROJECTION	UTM Zone 29N
SCALE	1:800,000	PAGE SIZE	A3
PROJECT TITLE	MachairWind		

Figure 5.1: Protected Areas in the Vicinity of the Proposed Development

Haskoning Enhancing Society Together

ScottishPower Renewables

5.8 Termination

60. Response activities for Tier 1 incidents will conclude once all practicable measures have been implemented to contain, monitor, and recover pollution material, together with any associated clean-up materials and waste. These materials must then be disposed of through approved and licensed routes.

61. General principles for termination include:

- Confirming that no further active intervention would materially reduce pollution levels;
- Ensuring compliance with regulatory requirements and project-specific protocols; and
- Documenting all actions, observations, and the rationale for termination in the incident report to support transparency and post-incident review.

62. Following a Tier 2 or 3 pollution incident, response activities will conclude based on consultation with an appropriate specialist spill response contractor, or the MCA.

6 Waste Management

63. Oil and oily waste will be managed in accordance with the principles of the waste hierarchy (Scottish Government, 2017), prioritising prevention, reuse, recycling, and recovery before disposal. Decisions regarding temporary storage, treatment, disposal, or potential reuse will consider environmental impacts, legal obligations, and all relevant licensing requirements.

64. Additionally, vessel-generated waste will be managed in accordance with a Garbage Management Plan (MARPOL Annex V), detailing procedures for collecting, storing, processing, and disposing of garbage onboard, and appointing a responsible person. Ships of 100 GT and above are also required to maintain a Garbage Record Log Book, logging all garbage discharges, incinerations, accidental losses, and other relevant details such as date, time, position, type and quantity of garbage.

7 Response Tracking and Record Keeping

65. To ensure effective monitoring and recording during incident response, regular status updates will be provided to the MCC, including whether the release has been stopped or controlled, details of equipment deployed, clean-up progress, and estimated completion time.

66. Comprehensive and accurate documentation is essential throughout all pollution response operations. Where appropriate, the following information shall be recorded:

- **Incident Communications**: Details of initial notifications, updates, and feedback from clean-up activities;
- **Meetings and Decisions**: Records of meetings, key decisions, and the rationale behind each decision;
- **Operational Activities**: Timesheets, personnel details, on-site actions, volumes of oily waste, deployment and use of response equipment, and records of support assets (e.g., vessels and vehicles);
- **Visual Documentation**: Photographs, drone footage, annotated maps, and diagrams;
- **Expenditure Tracking**: Costs associated with personnel, equipment, logistics, and waste disposal; and
- **Clean-Up Outcomes**: Post-response site reports, progress updates, and evaluations of response effectiveness.

67. Tier 2 and Tier 3 incidents will require additional monitoring, reporting, and coordination (including engagement with external response contractors and authorities), the details of which are outlined within the **Table 4.1**, and further detailed within the project Emergency Response Plan.

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1 ANNEX I

1.1 Pollution Scenario Log Sheet

1. All personnel involved in responding to a pollution scenario must complete an incident log or form to record actions taken and observations made during the response.

Table A.1.1 Example incident log report form

Date/Time	Location of Incident	Source and Cause of Pollution	Estimated Quantity and Type of Pollutant	Description of Pollution Scenario	Weather and Sea Conditions
Local time or GMT/UTC	Latitude and longitude, vessel name, or other identifying details.	For example, vessel name and type, incident type (e.g., collision).	Including key characteristics.	Direction, length, breadth, and appearance of slicks.	Current and forecasted. including key characteristics

1.2 Contacts Directory

Table A.1.2 Example contacts directory

Organisation	Contact	Telephone (office hours)	24 hr. Telephone	Mobile/Email
Applicant				
Applicant				
Contractors/Subcontractors				
First responder – First Level Escalation				
Emergency Coordinator – Second Level Escalation				
Emergency Response Team				
Health and Safety, and Environment Managers				
Marine Coordinator (appointed by Applicant)				
Applicant's Consents Lead				
Marine Scotland				
MD-LOT				
Coastguard and MCA				
Stornoway MRCC				
MCA				
Port Authorities				
Other Installations				
Refer to Oil Spill Contingency Plan for full list				
Environmental Agencies				

2 ANNEX II

1. The MPCP guidance for offshore renewable energy projects (MD-LOT, 2025) recommends pre-application consultation with the MCA regarding the content of MPCPs to ensure alignment with expectations. As such, consultation, in line with this guidance has been undertaken with the MCA for this MPCP.

Table A.2.1 Summary of feedback from MCA on the content of the MPCP

Organisation	Feedback	Response

3 ANNEX III

Table A.3.1 Summary of legislation, policy, and guidance relevant to this MPCP

Document Name	Relevance to this Marine Pollution Contingency Plan (MPCP)
Legislation	
International Convention for the Prevention of Pollution from Ships (MARPOL) 1973/1978 (International Maritime Organisation (IMO), 1973a/1978)	The primary aim of MARPOL is to prevent and minimise pollution of the marine environment by ships, both from operational activities and accidents.
International Convention for the Safety of Life at Sea (SOLAS), Chapter V, Regulation 19 (IMO, 1974)	The primary objective of SOLAS Chapter V, Regulation 19 is to improve maritime safety and navigational efficiency by requiring vessels to carry and properly operate specified navigation equipment and systems, such as Automatic Identification Systems (AIS) and global navigation satellite systems. The regulation also mandates that these systems are maintained in effective working order and that vessels transmit relevant information to support situational awareness and facilitate search and rescue operations.
International Regulations for Preventing Collisions at Sea (COLREGs) 1972 (IMO, 1972)	The primary objective of the 1972 Convention on the International Regulations for Preventing Collisions at Sea (COLREGs) is to establish a globally consistent set of rules for vessel conduct, promoting maritime safety and reducing the risk of collisions. These regulations define the hierarchy of vessels, outline signalling requirements, and provide guidance for avoiding hazardous situations.
Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 (UK Government, 1996)	The Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 were introduced to give effect to COLREGs. Their core purpose is to promote safe navigation by setting out mandatory rules on vessel conduct, the use of lights and sound signals, and procedures for avoiding collisions. These regulations apply to UK-registered vessels and all other vessels operating within UK waters, providing a legal framework aimed at minimizing the risk of maritime accidents.
Merchant Shipping (Prevention of Pollution by Oil) Regulations 2019 (UK Government, 2019)	The Merchant Shipping (Prevention of Pollution by Oil) Regulations 2019 aim to prevent and reduce oil pollution from ships, whether caused by operational discharges or accidental spills. These regulations implement Annex I of the MARPOL Convention, establishing internationally agreed technical standards for both UK-flagged and foreign vessels operating in UK waters. They cover requirements such as ship construction, equipment standards, discharge controls, and the provision of Shipboard Oil Pollution Emergency Plans, ensuring compliance with global measures to protect the marine environment.
Merchant Shipping (Safety of Navigation) Regulations 2002 (UK Government, 2002)	The Merchant Shipping (Safety of Navigation) Regulations 2002 were introduced to implement Chapter V of the International Convention for the SOLAS. Their main purpose is to enhance navigational safety for all ships by requiring the carriage and proper use of navigational equipment, the reception of essential safety information, and effective communication procedures. These measures aim to reduce the risk of maritime accidents and ensure compliance with internationally agreed standards.
Garbage Management Plan (MARPOL Annex V) (IMO, 1973b)	MARPOL Annex V establishes requirements for ships to develop and implement a Garbage Management Plan, maintain a Garbage Record Book, and display placards regarding proper waste segregation and disposal. It prohibits disposal of plastics at sea, restricts other types of garbage (e.g. food, dunnage, cleaning agents), and mandates distance limits and special-

Document Name	Relevance to this Marine Pollution Contingency Plan (MPCP)
	area rules. These measures support MPCP objectives by ensuring structured onboard waste handling, preventing marine litter, and enabling regulatory compliance and traceability of waste streams.
Merchant Shipping (Carriage of Dangerous Goods and Marine Pollutants) Regulations (1997, amended 2024)	This UK regulation implements SOLAS Chapter VII and MARPOL Annex III, controlling the carriage of dangerous goods and harmful substances (marine pollutants) in packaged form. It aligns with the IMDG Code and includes packaging, labelling, documentation, stowage, incident reporting, and compliance measures for both UK and foreign ships in UK waters. It is relevant to MPCP by mitigating polluting risks from packaged hazardous cargo, enhancing preparedness and response coordination in case of spillage or accident
Policy	
UK National Contingency Plan for Responding to Marine Pollution scenarios 2024 (MCA, 2024)	The UK National Contingency Plan for Responding to Marine Pollution scenarios is designed to deliver a rapid, coordinated, and effective response to marine pollution and its consequences. It covers incidents originating from both marine and land-based sources, including those involving ships and offshore installations, ensuring that impacts are managed in a structured and proportionate manner.
Guidance	
Marine Licensing and Consenting: Offshore Renewable Energy Projects – Mitigation and Monitoring Plans (MD-LOT, 2025)	This guidance outlines the development of mitigation and monitoring plans required to support Section 36 consent applications and Marine Licence applications for the construction and/or operation of offshore renewable energy generating stations and associated transmission infrastructure.
Guidance Notes for Preparing Oil Pollution Emergency Plans (MCA, 2022)	This guidance sets out requirements for offshore operators to develop robust oil pollution response plans, addressing key elements such as reporting, communication protocols, and tiered response strategies. While primarily intended for the oil and gas sector, its principles are also applicable to offshore renewable projects where pollution risks exist.
Marine Guidance Note (MGN) 654: Safety of Navigation: Offshore Renewable Energy Installations Guidance on UK Navigational Practice, Safety and Emergency Response. (MCA, 2021)	This MGN identifies key considerations for evaluating the impact of offshore renewable energy developments on navigational safety and emergency response capabilities. These include search and rescue operations, salvage and towing arrangements, and counter-pollution measures.