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Caithness-Moray HVDC Project: Cable Repair Work

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Caithness-Moray HVDC Project: Completion of works in 2019

Dear Sir/Madam

The Caithness-Moray HVDC Project endeavours to complete the cable installation in 2019. As previously discussed with Marine Scotland this has included a change in methodology.

The ongoing work for the project has been assessed under the European Protected Species (EPS) Risk Assessment (Document number 1174549) on which the issue of EPS licence MS EPS 01 2018 2 was based. This EPS Risk Assessment included all activities proposed at the time, and specified a maximum number of days per activity (Table 1).

Based upon progress, it is now understood that a number of additional days will be required for cable repair (including excavation) over and above those proposed within the EPS Risk Assessment (1174549). In addition, due to a change in the proposed backfill methodology, a Marine Licence variation will be applied for to permit additional Controlled Flow Excavator (CFE), rock placement operations, and the potential for use of a Cable Protection System (CPS), in the place of the original backfill by plough (Table 1).

Table 1: Details of the work outlined and assessed in the EPS RA and carried out from September 2018

Task	Original Estimated duration (days) excl. weather/other delays*	Total duration (days) of works completed #	Forecast days for 2019 excl. weather/other delays*
Plough Backfill	66	0	0
Rock placement	60	0	49 (*35*+)
Cable repair	23	8	35
Excavation/burial (Jet trenching, Mass Flow Excavator & CFE)	48	16	46 (*26*+)
Cable protection System	-	-	28
Total Days	197	24 (over 43 days of operations)	158

**Maximum duration (excluding weather/other non-working days) not anticipated to exceed 200% of estimated durations stated above*

#Duration of the use of sound emitting equipment covered under the EPS Licence (USBL)

+ Addition works under the new Marine Licence variation (bracketed values are within the total value specified)

CFE and rock placement by fall pipe vessel was previously assessed in the EPS Risk Assessment for Extension of Works (ref: 1174549) and as such it is considered that there has been no material change in the equipment used for these works. Rock material may also be installed by a side dump method or via rock grab, however it is considered that these methods do

not increase the noise emissions as the predominant noise source for rock placement is the material moving within the fall pipe, not the material striking the seabed. As such, other methods of rock installation are deemed to be less impacting (in terms of noise emissions) and therefore are covered within the more precautionary assessment of full use of fall pipe installation. The side dump approach will only be used in shallow water and any animals present in the vicinity will have moved away from the vessel noise source, ensuring that any additional risk arising from collision with rock is nil/negligible and no change to the EPS Licence is therefore required for this activity. The use of a CPS does not present additional risk to marine mammals, and any use of USBL to track diver positioning is assessed as per other underwater equipment and therefore does not present a material change to the assessment.

The total duration of the work under Licence is not set to alter materially as the additional repair and CFE work is predicted to be equivalent in duration to the original backfill operations. Furthermore, while additional volume of rock requires a Marine Licence variation, the duration of the planned work will fall within the maximum days previously assessed and therefore this additional work falls within the scope of the existing EPS Licence. It should also be noted that although the forecast days are defined per activity, as the Licenced activity is USBL use, it is considered that any change in the split of activities does not affect the Licence as long as the maximum number of days assessed (including tolerances) is not exceeded.

It is noted that vessels may be present in the project area for longer durations than listed (Table 1) as only the duration of Licenced sound emissions (USBL) is assessed. Under the EPS Risk Assessment for Extension of Works (ref: 1174549) vessel noise and collisions risk were also assessed; the effects were considered to be negligible and it was considered that an EPS licence not required for these activities. It is considered that the conclusions of the EPS RA remain valid and that the impact of any additional vessel activity connected to the change in backfill methodology remains negligible.

As per the EPS Risk Assessment for Extension of Works, mitigation will be applied for the use of USBL positioning equipment (i.e. pre-work searches as per the current JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys) when these works are undertaken. During transits a nominated competent observer (likely to be a member of the marine mammal mitigation team) will keep watch for marine mammals and basking sharks. The Master of the vessel will follow the Scottish Marine Wildlife Watching Code.

It is therefore considered that all elements of the excavation, cable repair, rock placement, and CPS installation, including equipment and vessel operations, and collision risk, have been suitably assessed (themselves, or via suitable equivalent) within the Extension of Works EPS Risk Assessment (Document number 1174549). Furthermore, as the duration of these combined works is within those assessed for all operations previously, it is considered that this presents no material change and the change in activity can be included under the current EPS licence (MS EPS 01 2018 2) which lists 'subsurface positional equipment – use of USBL systems and beacons' as the activity for which the Licence to Disturb Marine Species was granted.

We assume therefore that this work can proceed as outlined above, however it would be greatly appreciated if you could confirm Marine Scotland's agreement with the above conclusions.

Yours sincerely

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Senior Marine Ecologist
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