

SCOTTISH HYDRO ELECTRIC POWER DISTRIBUTION PLC

Ardmore to Loch Pooltiel Distribution Cable Construction Environmental Management Plan



P2816_R6691_Rev1 | 15 August 2025

Intertek Metoc

Exchange House, Station Road, Liphook, Hampshire GU30 7DW, United Kingdom

DOCUMENT RELEASE FORM

Scottish Hydro Electric Power Distribution PLC

P2816_R6691_Rev1

Ardmore to Loch Pooltiel Distribution Cable

Construction Environmental Management Plan

Author/s

[Redacted]

Project Manager

[Redacted]

Authoriser

[Redacted]

[Redacted]

[Redacted]

Rev No	Date	Reason	Author	Checker	Authoriser
Rev 0	08/08/2025	Original for client review	[Redacted]	[Reda	[Reda
Rev 1	15/08/2025	Client comments addressed	[Redacted]	[Reda	[Reda

Intertek Metoc is the trading name of Metoc Ltd, a member of the Intertek group of companies.

CONTENTS

	DOCUMENT RELEASE FORM	I
	GLOSSARY	V
1.	INTRODUCTION	1
1.1	Background	1
1.2	Objectives of this Document	2
1.3	Marine CEMP Document Management	2
1.4	Links with Other Documents	3
2.	ENVIRONMENTAL MANAGEMENT MEASURES	4
2.1	Overview	4
3.	ENVIRONMENTAL MANAGEMENT FRAMEWORK	12
3.1	Introduction	12
3.2	Marine CEMP Roles and Responsibilities and Chain of Command	12
3.3	Contractor Staff Competence, Training and Awareness	16
3.4	Project Inductions	16
3.5	Toolbox Talks	16
3.6	Vessel Notice Boards/Awareness Materials	16
3.7	Marine CEMP Communications and Reporting	17
4.	MARINE MAMMAL PROTECTION PLAN	20
4.1	Overview	20
4.2	Marine Mammal Protection Plan (MMPP)	20
5.	MARINE ARCHAEOLOGY MANAGEMENT PLAN	21
5.1	Overview	21
5.2	Archaeology and Cultural Heritage Management Plan	21
6.	INVASIVE NON-NATIVE MARINE SPECIES PLAN	22
6.1	Overview	22
6.2	Regulatory Requirements	22
6.3	Invasive Non-Native Marine Species Management Plan	22
7.	WASTE MANAGEMENT PLAN	24

7.1	Overview	24
7.2	Waste Management Plan	24
8.	POLLUTION PREVENTION, SPILL RESPONSE AND CONTINGENCY PLAN	27
8.1	Overview	27
8.2	Emergency Spill Response	27
8.3	Monitoring and Record Keeping	27
8.4	Pollution Prevention Measures Onshore (at Cable Landfall)	28
9.	MONITORING AND REPORTING PLAN	29
9.1	Introduction	29
9.2	Monitoring During Cable Installation	29
9.3	Reporting During/After Cable Installation	31
9.4	Incident Response and Reporting	31
	REFERENCES	32

LIST OF TABLES AND FIGURES

Tables

Table 1-1	Other Documents Linked to the Marine CEMP	3
Table 2-1	Environmental Management Measures	5
Table 3-1	Roles and Responsibilities	13
Table 3-2	Required Returns and Notifications	17
Table 9-1	Environmental Compliance Checklist	29

Figures

Figure 1-1	Ardmore – Loch Pooltiel Cable Installation Application Corridor (Drawing Reference: P2816-LOC-004)	1
------------	--	---

GLOSSARY

AIS

Automatic Identification Systems

BWM

Ballast Water Management

BWMP

Ballast Water Management Plan

CFLO

Company Fisheries Liaison Officer

CEMP

Construction Environment Management Plan

COSHH

Control Of Substances Hazardous to Health

DDV

Drop Down Video

DPR

Daily Project Report

EPS

European Protected Species

EPS RA

European Protected Species Risk Assessment

FIR

Fishing Industry Representative

FLMAP

Fisheries Liaison Mitigation Action Plan

HIRA

Hazard Identification and Risk Assessment

IMO

International Maritime Organisation

ISM

International Safety Management

JNCC

Joint Nature Conservation Committee

KIS-ORCA

Kingfisher Information Service – Offshore
Renewable & Cable Awareness

MARPOL

International Convention for the Prevention of
Pollution from Ships / Maritime Pollution

MCA

Maritime and Coastguard Agency

MD-LOT

Marine Directorate - Licensing Operations Team

MGO

Marine Gas Oil

MHWS

Mean High Water Spring

MMO

Marine Mammal Observer

MMPP

Marine Mammal Protection Plan

MSDS

Material Safety Data Sheets

NLB

Northern Lighthouse Board

PAD

Protocol for Archaeological Discoveries

PAM

Passive Acoustic Monitoring

pUXO

Potential Unexploded Ordnance

ROV

Remotely Operated Vehicle

RQHSE

Risk, Quality, Health, Safety and Environment

SEPA

Scottish Environmental Protection Agency

SFF

Scottish Fisherman's Federation

SHE

Safety, Health and Environment

SHEPD

Scottish Hydro Electric Power Distribution plc

SOP

Standard Operating Procedures

SOPEP

Shipboard Oil Pollution Emergency Plan

SSEN

Scottish and Southern Electricity Networks

SWCN

Special Waste Consignment Note

UK

United Kingdom

UKHO

United Kingdom Hydrographic Office

WTN

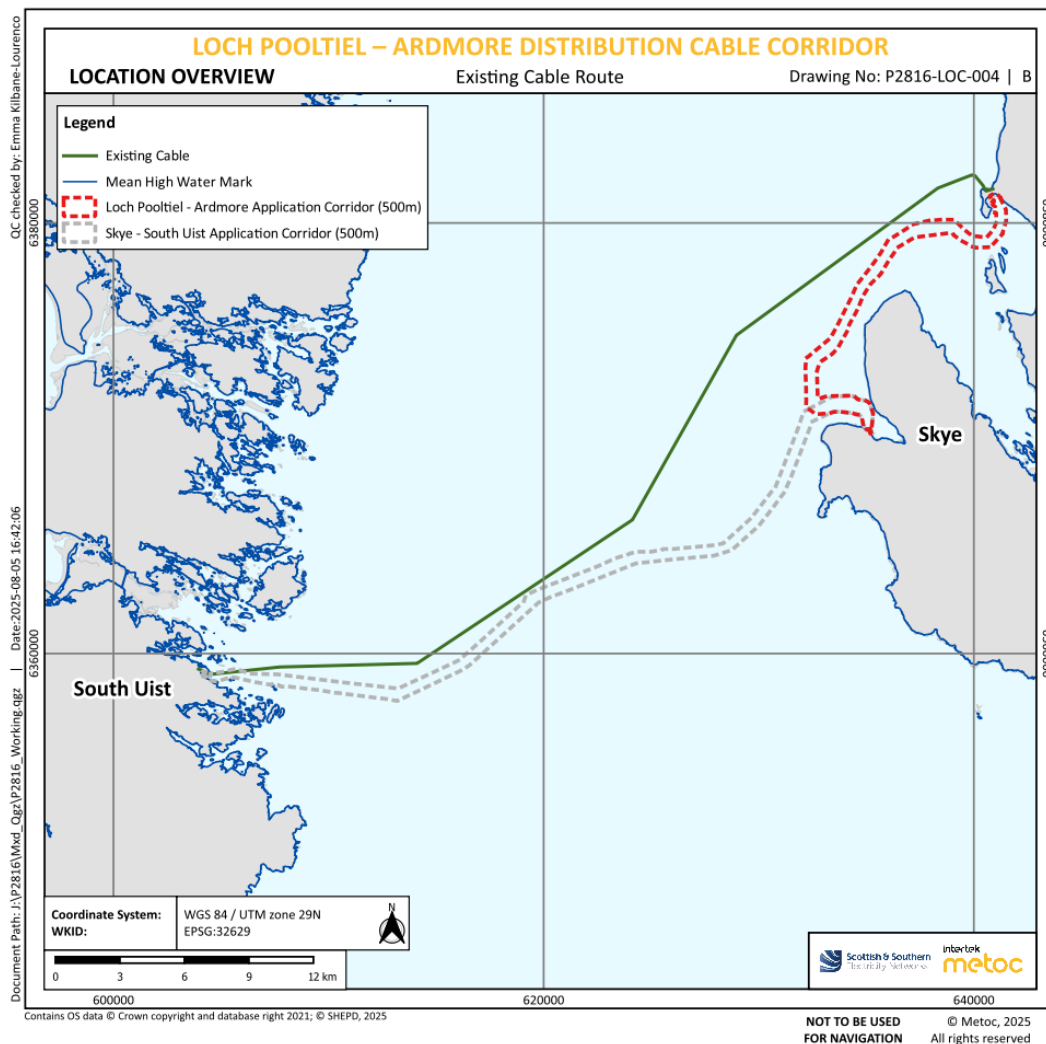
Waste Transfer Note

1. INTRODUCTION

1.1 Background

This marine Construction Environment Management Plan (CEMP) covers the installation phase of the Ardmore to Loch Pooltiel 33kV submarine electricity cable (the Project, hereafter also referred to as Ardmore – Loch Pooltiel). The installation operations will be undertaken by Jan De Nul (known as the *Contractor*) and will take place within an Application Corridor approximately 500m wide and approximately 20km in length. The proposed cable will be approximately 20km in length (Figure 1-1; Drawing Reference: P2816-LOC-004).

Figure 1-1 Ardmore – Loch Pooltiel Cable Installation Application Corridor (Drawing Reference: P2816-LOC-004)



This marine CEMP sets out the proposed environmental management framework and procedures that will be followed by the *Contractor* during the installation of the cable. It covers all potential effects associated with the installation of the cable and all works at the landfall occurring below Mean High Water Springs (MHWS). Given that the cable will be installed across the shore, management of potential impacts on the shore have also been considered or have been referenced to the separate

onshore CEMP. Mitigation measures are incorporated in the design of the cable to prevent or reduce adverse environmental effects as much as possible. These measures are discussed separately as part of the Marine Environmental Appraisal (MEA) report (Document reference P2816_R6690).

1.2 Objectives of this Document

The purpose of this marine CEMP is to provide the over-arching framework for environmental management during the installation of the subsea cable. It sets out the principles that will be applied by the *Contractor* in implementing their environmental management plans. The works will be undertaken considering the following:

- Relevant legislation as outlined in the supporting MEA report;
- Relevant policies in Scotland's National Marine Plan and the West Highland Local Development Plan;
- Findings of the assessments undertaken to support the Marine Licence application;
- Any conditions established through the Marine Licence and other relevant licences including the European Protected Species (EPS) Licence and Basking Shark Licence;
- Scottish Hydro Electric Power Distribution (SHEPD) policies and procedures:
 - Sustainability Policy (PO-COR-033)
 - Environment and Climate Change Policy (PO-COR-054)
 - Safety Health and Environmental Organisation Standard (MS-SHE-001)
 - Business Unit SHEPD Requirements (SP-PS-LT-901)
 - Safety, Health & Environment (SHE) Requirements
 - Specification for Contracts (SP-SHE-009-001 SSE)
 - Responsible Procurement Charter (REF-PRS-004)
 - Incident Reporting Management and Investigation Standard (MS-SHE-010)
 - Minimum Requirements for Submarine Electricity Cable - Environmental Specification (SP-CAB-NET-402)
 - SHEPD Communication, Reporting of SHE Incidents (REF-PS-SHE-COM-015)
 - Group Sustainability Policy (PO-GRP-016)
 - Group Climate Change Policy (PO-GRP-001)
 - Group Safety and Health Policy (PO-GRP-015)
 - Group Safety and Health Policy Summary (PO-SHE-001)
 - Group Environment Policy (PO-GRP-007)

1.3 Marine CEMP Document Management

The marine CEMP will be a controlled document and will be formally issued to the *Contractor's* cable installation team. Live copies of the CEMP will be held at the following locations:

- *Contractor's* project office;
- At the premises of any agent of the *Contractor* acting on behalf of the *Contractor*;
- All site offices dealing with marine operations;

- Onboard all principal construction vessels involved in offshore activities;
- With the *Contractor's* Environmental Manager.

The *Contractor* will provide the *Employer* with the most up to date copy of the marine CEMP and is responsible for maintaining the register of document versions and issue dates.

1.4 Links with Other Documents

This marine CEMP document sets out the proposed overarching environmental management framework to be applied during the Project and forms part of a suite of approved documents that were prepared to inform the Marine Licence application and inform the framework for environmental management of the Project.

Table 1-1 Other Documents Linked to the Marine CEMP

Document	Document Reference
Project Description	Intertek Document Reference "P2816_R6681" Appendix A of MEA
Marine Environmental Appraisal (MEA) Report	Intertek Document Reference "P2816_R6690"
West Highland Fishing Liaison and Mitigation Action Plan (FLMAP)	SHEPD Document Reference "Fishing Liaison Mitigation Action Plan for West Highlands" Appendix B of MEA
West Highland European Protected Species (EPS) Risk Assessment (RA)	SHEPD Document Reference "West Highland EPS Risk Assessment" Appendix C of MEA
Ardmore – Loch Pooltiel Construction Environmental Management Plan (CEMP)	Intertek Document Reference "P2816_R6691" Appendix D of MEA
Marine Licence Application Form	Intertek Document Reference "P2816_AJJUL20"
EPS Licence Application Form	Intertek Document Reference "P2816_AJJUL21"
Basking Shark Licence Application Form	Intertek Document Reference "P2816_AJJUL22"

2. ENVIRONMENTAL MANAGEMENT MEASURES

2.1 Overview

The environmental management measures to be implemented for the marine installation phase of the Ardmore – Loch Pooltiel subsea cable (marine CEMP requirements) are outlined in Table 2-1. The measures listed have been combined in a single location to allow the *Contractor* to check and record compliance against the various management measures, mitigation measures and consent conditions (including best practice requirements) as outlined in the supporting FLMAP, MEA Report and when received, the Marine Licence, EPS licence and Basking Shark Licence.

- Prior to the start of installation activities these measures will be reviewed, and as appropriate additional detail will be provided on their implementation.

This Section should be read in conjunction with the Monitoring and Reporting Plan provided in Section 9 of this marine CEMP which describes the monitoring and reporting activities that need to be performed during the execution of the Project.

Table 2-1 Environmental Management Measures

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
All environmental and ecological aspects							
Toolbox talks	EM1 EM2 Marine CEMP Section 3.5	All project personnel will be trained and informed of their responsibility to implement the environmental and ecological mitigation outlined in the marine CEMP (this document).	All phases of works	Contractor Environmental Manager			
Seabed, Benthic and Intertidal Ecology							
Environmental planning	EM4 MEA "P2816_R6690" Section 8	The final cable route will be optimised as part of the final engineering design to avoid impacts on sensitive environmental features, including Annex I habitats and wrecks as far as possible. Cable protection methods and quantities will be carefully selected and considered to minimise any potential impact on environmentally sensitive habitats.	Installation	Contractor Environmental Manager and Offshore Manager			
Marine Mammals							
Scottish Marine Wildlife Watching Code	EM2 EM5	All vessels will adhere to the Scottish Marine Wildlife Watching Code to minimise disturbance to marine wildlife.	All phases of works	Contractor Environmental Manager			
Marine Mammal Protection Plan	EM17 Marine CEMP Section 4	All works will be undertaken in accordance with the Marine Mammal Protection Plan.	All phases of works	Contractor Environmental Manager			
Slow moving installation vessel	EM8 EPS RA Section 3.4.2.	The slow speed of installation vessels (less than 4 knots) will minimise the risk of disturbance and injury impacts.	Installation	Vessel Master Offshore Manager			

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
Basking shark							
Scottish Marine Wildlife Watching Code	EM2 EM5	All vessels will adhere to the Scottish Marine Wildlife Watching Code to minimise disturbance to marine wildlife.	All phases of works	Contractor Environmental Manager			
Slow moving installation vessel	EM8 EPS RA Section 3.4.2.	The slow speed of installation vessels (less than 4 knots) will minimise the risk of disturbance and injury impacts.	Installation	Vessel Master Offshore Manager			
Basking Shark Code of Conduct	EM33 MEA "P2816_R6690" Section 2.10	All vessels will adhere to the Basking Shark Code of Conduct to minimise potential disturbance to basking shark.	All phases of work	Contractor Environmental Manager			
Seabirds							
Scottish Marine Wildlife Watching Code	EM2 EM5	All vessels will adhere to the Scottish Marine Wildlife Watching Code to minimise disturbance to marine wildlife.	All phases of works	Contractor Environmental Manager			
Rafting seabirds	EM31 EPS RA Section 5.5.1	The installation vessel will be slow moving (less than 4 knots), which will allow any rafting birds time to disperse. When not completing operational activities, vessels will avoid bird rafts where operationally possible, and it is safe to do so.	All phases of works	Contractor Environmental Manager			
Visual disturbance (from light)	EM6 EPS RA Section 5.5.4	Lighting on-board the cable installation vessel will be kept to the minimum level required to ensure safe operations. This will minimise disturbance to seabird species.	All phases of works	Contractor Environmental Manager			
Pollution Prevention, Spill Response and Contingency Planning							

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
Emergency Spill Response Plan	EM9 EM10 Marine CEMP Section 8	All works will be undertaken in accordance with the Emergency Spill Response Plan to ensure that the potential for release of pollutants from cable installation works is minimised.	All phases of works	Project Manager			
Ballast water	EM12	Ballast water discharges from vessels will be managed under International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWM Convention).	All phases of works	Offshore Manager			
Waste management							
Waste management	EM36 Marine CEMP Section 7	All waste produced by the Project will be handled and disposed of following the Waste Management Plan.	All phases of works	Offshore Manager			
Other Marine Users							
Fisheries Liaison Officer	EM13 MEA "P2816_R6690" Section 4	A Fisheries Liaison Officer (FLO) will be employed to manage interactions between cable installation vessels, personnel, equipment and fishing activity. The FLO will follow the FLMAP protocols. The proposed cable RPL will be issued to the Scottish Fishermen's Federation (SFF) for their information.	All phases of work	CFLO			
Notice to Mariners	EM14 MEA "P2816_R6690" Section 4	Notice to Mariners (NtMs; including local), Kingfisher bulletins, Radio Navigational Warnings, and/or broadcast warnings will be promulgated in advance of any proposed works to inform sea users of the works and activities. The Contractor may also use NAVTEX to inform mariners of the proposed works	Installation	Project Manager			

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
Preventing collisions	EM15 MEA "P2816_R6690" Section 4	All project vessels will comply with COLREGs – as amended, particularly with respect to the display of lights, shapes and signals.	All phases of work	Vessel Masters			
Cable route circulation	EM16 MEA "P2816_R6690" Section 4	The cable installation corridor will be notified in NtMs in accordance with the FLMAP. The proposed cable RPL will be issued to SFF in advance of the Works. An update will be distributed to stakeholders following the completion of installation. 'As-laid' co-ordinates of the installed cable route will be recorded and circulated to the UKHO, KIS-ORCA service and any other relevant authorities. The installed cable will be marked on Admiralty Charts and KIS-ORCA charts (paper and electronic format).	Installation, Post-Installation	Project Manager			
Stakeholder engagement	EM18 FLMAP Section 2	Continuing effective positive liaison with all interested parties through the pre-construction, construction and operational phases of the cable installation..	All phases of works	CFLO			
Automatic Identification Systems (AIS) Tracking	EM19 Navigational Risk Assessment MEA "P2816_R6690" Appendix B	The cable installation vessel will have AIS as a legal requirement.	Installation	Vessel Master			
Safety zone	EM20 FLMAP Section 9	Implementation of safety zones (of up to 500m) around the cable lay vessel will reduce the risk of collision between the cable laying vessel and other vessels transiting the area.	Installation	Vessel Master			
Fishing Industry Representatives (FIR)	EM21	Should a FIR not be present on a vessel, the Fishing Gear Interaction Standard	Installation	CFLO/FIR			

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
and Standard operating procedures (SOP)	FLMAP Section 9.4	Operating Procedure (SOP) will be followed. The proposed cable RPL will be issued to the SFF for their information.					
Consultation	EM22 MEA "P2816_R6690" Section 11	Early consultation with relevant contacts to provide notification of impending activity.	Before operations commence	Project Manager			
Guard vessel (if required)	EM23 Navigational Risk Assessment MEA "P2816_R6690" Appendix B	A guard vessel may be used where a risk to the asset or a danger to navigation has been identified.	Installation	Offshore Manager			
Cable protection	EM24 MEA "P2816_R6690" Section 11	Appropriate cable protection to be installed as applicable along the cable route. Any cable protection installed will ensure any reductions to the navigable depth in the area are below 5%, unless discussed with the Maritime and Coastguard Agency (MCA), and approved in advance.	Post-installation	Offshore Manager			
Potential Unexploded Ordnance (pUXO)	EM26 MEA "P2816_R6690" Section 11	If pUXO items are discovered during any phase of the Project, the location of the item will be recorded, and immediate advice sought from relevant authorities. Munitions awareness briefings will be given to all relevant personnel.	All phases of works	Offshore Manager			
Dropped objects	EM35	Licensees must report dropped object incidents to the nearest local coastguard station by telephone at the first opportunity. In instances where the dropped object poses a hazard to other mariners, a NtMs will be issued to alert relevant parties. To ensure other marine users are aware of any hazard, incidents	All phases of work	Offshore Manager			

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
		must also be reported through a Marine Directorate – DROPOB1 - Offshore Wind & Marine Renewables Dropped Objects Form, no later than 24 hours after the event.					
Marine Archaeology							
Marine archaeology mitigation	EM27 Marine CEMP Section 5	All works will be undertaken in accordance with the Marine Archaeology Management Plan.	All phases of works	Contractor Environmental Manager (Communicating with Offshore Manager)			
Environmental Monitoring and Reporting							
Monitoring and Reporting Plan	EM28 Marine CEMP Section 9	To ensure works are carried out as per legislation, consent and licence conditions and in line with the <i>Employer</i> requirements monitoring and reporting of activities is to be undertaken in accordance with Monitoring and Reporting Plan.	All phases of works	Project Manager			
Equipment Checks							
Pre-installation equipment checks	EM29	All equipment will be checked and recorded prior to the commencement of installation activities to ensure that following completion of the cable installation all equipment has been recovered. The list of checks is to be determined during the Hazard Identification and Risk Assessment (HIRA) process prior to commencement of the works.	Pre-installation	Offshore Manager			
Post-installation equipment checks	EM30	Upon completion of the cable installation operation, post installation equipment	Post-installation	Offshore Manager			

Environmental Aspects	Embedded Mitigation Reference	CEMP Requirement	Project Phase (Pre-lay survey, Installation, Post-lay survey)	Responsibility	Date completed/ reviewed or checked [HOLD: to be completed through works]	Relevant Reference/ Evidence [HOLD: to be completed through works]	Comment/ Ongoing actions required [HOLD: to be completed through works]
		checks will be completed to confirm that all equipment has been recovered in its entirety and no unlicensed deposits in the marine environment result from the project operations. The list of checks is to be determined during the HIRA process prior to commencement of the works.					
Marine Licence Conditions							
Marine Licence (Insert reference number when received)	ML #	[Marine Licence Conditions for all phases of work to be listed below when marine licence is received.]	All phases of works	Contractor Environmental Manager (Communicating with Offshore Manager)			
European Protected Species (EPS) Licence and Basking Shark Licence Conditions							
EPS Licence *Reference*	EPSL #	EPS and BS Licence Conditions for all phases of work to be listed below when marine licence is received.]	All phases of works	Contractor Environmental Manager (Communicating with Offshore Manager)			
Basking Shark (BS) Licence *Reference*	BSL #						

Note: Embedded mitigation references are cross referenced to the MEA (P2816_R6690)

3. ENVIRONMENTAL MANAGEMENT FRAMEWORK

3.1 Introduction

This section sets out the environmental management framework for the Project, under the following areas:

- Marine CEMP – roles and responsibilities;
- Marine CEMP – staff competency and training; and
- Marine CEMP – communications and reporting.

3.2 Marine CEMP Roles and Responsibilities and Chain of Command

This section sets out the roles and responsibilities of all relevant Project personnel in relation to the delivery of this marine CEMP.

All Project personnel have a responsibility to comply with the requirements of the marine CEMP, however, the key roles relevant to the delivery and implementation of the marine CEMP are outlined in Table 3-1.

Table 3-1 Roles and Responsibilities

Role	Responsibilities	Name and Contact Details
Project Manager (<i>Contractor</i>)	<p>Responsible for ensuring that the project is in compliance with any Consent, licence or associated information and identifies any breach or potential breach to the <i>Employer</i> Marine Consents Manager. Specific responsibilities, include:</p> <ul style="list-style-type: none"> Facilitate dissemination of environmental requirements to the Project Team; Ensure and be responsible for compliance with all permits, licences and consents, and to report any deviations or breaches; Oversee the implementation and review of environmental procedures throughout the Project; Monitor the environmental performance of the Project through maintaining an overview of incidents, inspections and audits; Ensure that environmental considerations form an integral part of Design and Implementation of the Works and include environmental reviews as part of regular Project meetings; Review environmental matters with the <i>Contractor</i> Environmental Manager on a regular basis and as per project requirements; Liaise with the <i>Contractor</i> Environmental Manager on all environmental issues as appropriate; Ensure that all environmental incidents are reported to the <i>Contractor</i> Environmental Manager according to agreed procedures; and Nominate individual Project Team members to support the <i>Employer</i> in public relations and community liaison activities, including local community meetings. 	
Project Manager (<i>Employer</i>)	<p>Amongst others is responsible for ensuring that the Project is in compliance with any Consent, licence or associated information and identifying and breach or potential breach to the Marine Consents Manager and/or the Occupational Safety Advisor, Large Capital Delivery Projects.</p>	
Offshore Manager (<i>Contractor</i>)	<p>The Offshore Manager will be responsible for overseeing the monitoring of environmental and licence compliance during works. The Offshore Manager is experienced in ensuring site operations function in a manner that is environmentally compliant. Responsibilities include:</p> <ul style="list-style-type: none"> Understanding and implementing all environmental procedures ensuring that site operations function in compliance; Reporting environmental incidents at the earliest possible time to the relevant statutory bodies (such as the Marine Directorate), SSEN's 30 minute reporting line and advising the <i>Contractor's</i> Environmental Manager & Project Manager of any incidents; Ensuring toolbox talks are carried out as necessary to highlight responsibilities of the Project under the marine CEMP. 	

Role	Responsibilities	Name and Contact Details
Risk, Quality, Health, Safety and Environment (RQHSE) Business Partner (<i>Contractor</i>)	<p>The RQHSE Business Partner shall ensure that:</p> <ul style="list-style-type: none"> Incidents are thoroughly investigated and reported throughout the Company; Assistance is provided, when appropriate, during investigations; Investigation levels are appropriate to the actual or potential severity of the incident; and Incidents are reported in compliance with statutory requirements. Develop risk assessments where appropriate. 	
Occupational Safety Advisor, Large Capital Delivery Projects (<i>Employer</i>)	<p>The Occupational Safety Advisor, Large Capital Delivery Projects shall ensure that:</p> <ul style="list-style-type: none"> Incidents are thoroughly investigated and reported throughout the Company; Assistance is provided, when appropriate, during investigations; Investigation levels are appropriate to the actual or potential severity of the incident; and Incidents are reported in compliance with statutory requirements. 	
Offshore Client Representative (<i>Employer</i>)	<p>The <i>Employer</i> Offshore Client Representative shall be responsible for ensuring that the <i>Employers</i> requirement under the contract with the <i>Contractor</i> are met. They shall be responsible for identifying and raising any defects or breaches against the contract, licences or supporting information and will be competent to stop the works if any unsafe operations are attempted. These defects and breaches shall be detailed in the Daily Progress Report (DPR). In the case that an incident occurs, the SSEN Offshore Client Representative will inform the <i>Employer's</i> Marine Consents Manager and the <i>Employer's</i> Project Manager.</p>	
Marine Consents Manager (<i>Employer</i>)	<p>The <i>Employer</i> Marine Consents Manager shall be responsible for:</p> <ul style="list-style-type: none"> Obtaining Marine Licences, Marine Works Licences and Marine EPS Licences (as appropriate) for the works; Review and acceptance of <i>Contractor</i> documentation; Pre works briefings where they are related to licence conditions or Consent compliance and Working alongside with the external stakeholder engagement team in developing relationships, including the Marine Directorate and The Crown Estate Scotland, to ensure that the project information is communicated as and when appropriate, in order to build consensus around project decision making. <p>They shall be in direct communication with the <i>Employer</i> Project Manager and <i>Employer</i> Offshore Client Representative.</p>	
Company Fisheries Liaison Officer (CFLO)	<p>The primary responsibilities of the CFLO are to establish and maintain effective communications between <i>Employer</i>, the <i>Contractor</i> and legitimate sea users during surveys and construction and ensure compliance with best practice guidelines whilst doing so. The proposed cable RPL will be issued to the SFF for their information. The primary responsibilities of the CFLO are described in detail in the FLMAP.</p>	

Role	Responsibilities	Name and Contact Details
Fisheries Industry Representative (FIR)	The FIR reports to the CFLO and works in conjunction with <i>Employer</i> . The primary responsibilities of the FIR are also described in the FLMAP.	
Marine Mammal Observer (MMO) and PAM operator	<p>The activities proposed do not require the use of Marine Mammal Observer (MMO) and Passive Acoustic Monitor (PAM) operators. Should proposed activities change so that they are required, MMO and PAM operators shall be trained or experienced in UK waters and shall implement the requirements set out in any applicable EPS Licence, Marine Mammal Protection Plan (MMPP) or EPS Risk Assessment, along with compliance with any other applicable legislation or guidance such as the Joint Nature Conservation Committee (JNCC) guidance. They shall be employed by the <i>Contractor</i> and shall be dedicated to the role on a full-time basis. A minimum of two MMO/PAM operators will be provided for 24-hour works.</p> <p>The Operators shall be responsible for the provision of any reports as required and within the timescales set out in any applicable licence(s).</p>	
Environmental Manager (<i>Contractor</i>)	<p>The <i>Contractor</i> Environmental Manager will be based at the <i>Contractors</i> head office and be in close contact with the Project Manager. The <i>Contractor</i> Environmental Manager shall be responsible for:</p> <ul style="list-style-type: none"> ▪ Preparation, implementation and undertaking reviews of environmental plans in accordance with <i>Employer</i> and <i>Contractor</i> requirements and procedures and current legislation; ▪ Providing the necessary updates and reports to Project Team and <i>Employer</i>; ▪ Interfacing with site staff and subcontracted companies on environmental issues; ▪ Ensuring the Project specific marine CEMP is implemented, ensuring compliance with procedures and legislation; ▪ In conjunction with the <i>Employer</i>, liaising with government departments, local authorities and other statutory authorities on environmental matters, as per project needs; and ▪ Reviewing Method Statements against environmental issues. 	
Other project staff	<p>All other project staff, including the Vessel Master, are responsible for ensuring that they adhere to the following:</p> <ul style="list-style-type: none"> ▪ Understand and implement procedures relevant to their role as laid out in the marine CEMP and the associated documentation including FLMAP and MMPP; ▪ Raise any environmental concerns with their supervisor or the <i>Contractor</i> Environmental Manager; and ▪ Report all environmental incidents to their supervisor or the RQHSE Business Partner as soon as possible. ▪ Compliance with marine CEMP. 	

3.3 Contractor Staff Competence, Training and Awareness

The *Contractor* will require that all personnel engaged in the Project have adequate experience to perform the activities executed under their responsibility or in their scope in a safe manner for themselves and others and are adequately supported at all levels. This will be confirmed by the *Contractor* Environmental Manager.

The *Contractor* will ensure that a Project organogram is in place and that the roles and responsibilities of all named personnel are clear and that clear project management procedures are in place for all aspects of the Project, including those related to environmental management measures.

The *Contractor* has a documented process in place to manage the selection and ongoing performance of any subcontractors to ensure that the SHE risks associated with the *Contractors'* activities are managed effectively.

The *Contractor* will require that all Project personnel attend required inductions including, but not necessarily limited to, matters related to *Employer's* environmental rules and policies, Site Rules, Health and Safety requirements, arrangements for First Aid and Emergency Response (including environmental pollution and emergency spills), Environmental Management, including Consent compliance requirements and Incident Management.

Training and awareness specific to this marine CEMP will be delivered using the following tools:

- Vessel inductions;
- HIRA Level 2 meeting;
- Toolbox talks; and
- Vessel notice boards / awareness material.

3.4 Project Inductions

Project inductions shall cover the marine CEMP, highlighting the key environmental sensitivities and considerations. This is to ensure that every Project team member is aware of their duty and the work-related specific hazards. Vessel Inductions are used to raise awareness for personnel regarding site/vessel rules, emergency response procedures and environmental protection arrangements.

3.5 Toolbox Talks

A toolbox talk will be held for the all-vessel crew as part of the daily briefing to be held before starting the operation or shift. In addition, a toolbox talk will be held for any new task or change in operation. These meetings are to address the exact nature of the task and HSE issues specific to the task being performed during a new working day/shift or task change. A list of attendees will be recorded at each toolbox talk meeting. Toolbox talks are a combination of briefing followed by a consultation with the workforce to check understanding and invite opinion.

3.6 Vessel Notice Boards/Awareness Materials

In addition to induction and talks, the *Contractor* Environmental Manager will be responsible for managing the preparation of a series of awareness materials, which may include training packs, posters, signs and newsletters. For example, posters on specific procedures can be on display on notice boards on the cable installation vessel.

3.7 Marine CEMP Communications and Reporting

3.7.1 Internal Communications

The following summarises the lines of communication between the key roles in relation to the implementation of the CEMP:

- The *Contractor* Environmental Manager plays a key role in the delivery of the marine CEMP, alongside the *Contractor* Offshore Manager and the *Employer* Marine Consents Manager and the *Employer* Offshore Client Representative. In fulfilling this role, the *Employer* Marine Consents Manager and *Employer* Offshore Client Representative can establish direct contact with the *Employer* Project Manager;
- The *Employer* Marine Consents Manager will report directly to the Marine Directorate – Licencing Operations Team (MD-LOT) on compliance with the marine CEMP and will liaise with MD-LOT and other stakeholders on environmental matters; and
- The *Employer* Marine Consents Manager and *Employer* Offshore Client Representative will maintain direct contact with and report on the marine CEMP compliance and environmental management issues to the *Employer* Project Manager.

During the works, daily (or as required) meetings / calls will take place involving the *Employer* Project Manager, the *Contractor* representatives, the *Employer* Marine Consents Manager and the *Employer* Offshore Client Representative. Consents and licence compliance and environmental management will be discussed as necessary. Any issues or points to note will be recorded in the DPR.

The *Contractor* will be required to provide regular written reports to the *Employer* on installation activity. *Contractor* reporting will include information on environmental management such as details of environmental incidents (if any), environmental statistics and records of environmental inspections or audits undertaken, and any such other information as may be required for the *Contractor* Environmental Manager to complete their reporting responsibilities. This information will inform the external reporting to MD-LOT (see below).

All Project personnel will be required to report any environmental concerns or issues to the *Contractor* Environmental Manager and/or *Contractor* Offshore Manager and the *Employer* Offshore Client Representative immediately.

3.7.2 External Communications

Table 3-2 summarises the marine CEMP external reporting requirements, mechanisms and frequencies.

The relevant returns and notifications as required by the Marine Licence (and set out in Table 3-2) will be collated from information supplied by the *Contractor* and the *Employer* Project Team where necessary.

Table 3-2 Required Returns and Notifications

Communication Type	Responsible Party	Proposed Frequency	Relevant Stakeholders
Pre-installation reporting requirements			
Details of agent, <i>Contractor</i> or subcontractor that will carry out any licenced activities	<i>Employer</i> Marine Consents Manager	As soon as is reasonably practicable	MD-LOT
Details of the proposed nature and timescale of the cable installation works	CFLO via NtMs	No later than 20 days prior to commencement of cable installation	All appropriate maritime users; Kingfisher

Communication Type	Responsible Party	Proposed Frequency	Relevant Stakeholders
			Fortnightly Bulletin; Fishers, their representatives and other relevant marine stakeholders
Registration of any noisy activities in the JNCC Marine Noise Register	<i>Contractor</i> Environmental Manager	Prior to submission of the Marine Licence and EPS Licence applications.	JNCC
During installation			
Details of the proposed nature and timescale of the cable installation works	CFLO via NtMs	During cable installation (as / if required)	Fishers, their representatives and other relevant marine stakeholders
Change to any of the information on which the Marine Licence is based	The <i>Employer</i> Marine Consents Manager	As soon as reasonably practical	MD-LOT
Details of any part of the licenced works that has become a danger to navigation or protection of legitimate users of the sea	<i>Contractor</i> Marine Consents Manager	As soon as reasonably practical	MCA Northern Lighthouse Board (NLB) Kingfisher Information Service Offshore Renewables and Cable Awareness (KIS-ORCA)
Environmental or pollution incidents	Responsible parties remain as The <i>Contractor</i> Marine Consents Manager and <i>Contractor</i> Supervisor for Offshore Works	Should one occur within 24 hrs for minor incidents within 30 mins for major incidents – the SSEN 30 minute reporting hotline should also be contacted for all incidents.	MD-LOT, MCA, Scottish Environment Protection Agency (SEPA)
Archaeological discovery	<i>Employer</i> Marine Consents Manager	Following an archaeological discovery	Historic Environment Scotland (HES) MCA.
Post-installation reporting requirements			
Nature and quantity of all substances and articles deposited below Mean High Water Springs (MHWS)	<i>Employer</i> Marine Consents Manager	Within 16 weeks of completion of cable installation	MD-LOT
Copy of Marine Licence and 'As Laid Plan'	<i>Employer</i> Marine Consents Manager	Following completion of cable installation	The Hydrographic Office And notify MD-LOT of the notification at the time it is made

Communication Type	Responsible Party	Proposed Frequency	Relevant Stakeholders
Cable route and a 500m zone either side of it as a hazardous area for anchoring	<i>Employer</i> Marine Consents Manager	Following completion of cable installation	MCA UK Hydrographic Office (UKHO) NLB The Kingfisher Information Service Offshore Renewables and Cable Awareness (KIS-ORCA) The International Cable Protection Committees Also notify MD-LOT of the notification at the time it is made
Assessment of any risks posed by final subsea cable route, burial depths and un-trenched areas where protection measures were used (to ensure that the safety of navigation and other legitimate users of the sea is not compromised)	<i>Contractor</i> Environmental Manager	Following completion of cable installation	MD-LOT
Marine mammal sightings	If required, <i>Contractor</i> to prepare MMO reports for issue to MD-LOT by the licence holder	Within 4 weeks of completion	MD-LOT JNCC NatureScot

4. MARINE MAMMAL PROTECTION PLAN

4.1 Overview

The *Contractor* will ensure legal compliance and implement measures in line with the relevant regulatory and policy framework regarding marine mammals. To reduce the collision risk and disturbance to marine mammals a Marine Mammal Protection Plan (MMPP) has been prepared (Section 4.2). The mitigation measures in the MMPP are informed through separate EPS Risk and Protected Sites and Species Assessments (EPS RA) undertaken for the Project (Document reference: A-303128-S04-A-REPT-004).

4.2 Marine Mammal Protection Plan (MMPP)

The following measures have been identified to reduce the risk of disturbance to marine mammals (cetaceans and seals) present in the vicinity of the Project through the preparation of a MMPP. The potential for disturbance to marine mammals arises primarily from the noise generated by the proposed cable replacement activities.

- Installation vessel will be travelling at a slow speed (maximum of 4 knots) during the installation works.
- The *Contractor* will provide all project personnel with marine mammal awareness and good practice training.
- Posters and signs of identifying risks and good practice will be provided.
- Pictures of species of concern will be provided.
- MMO and PAM to be used where necessary.

5. MARINE ARCHAEOLOGY MANAGEMENT PLAN

5.1 Overview

The *Contractor* is required to protect archaeological assets in the Project area. More detail on the regulatory and policy framework regarding archaeology can be found in Section 10 of the MEA Report (Intertek Document Reference: P2816_R6690). There are five known wrecks within the Application Corridor. Potential impacts on unknown heritage will be managed through the implementation of an archaeology and cultural heritage plan management plan (Section 5.2).

5.2 Archaeology and Cultural Heritage Management Plan

5.2.1 Mitigation by design:

- The potential for significant impacts on marine cultural heritage has been reduced to negligible-low during the development and design of the Project by conducting a desk-based assessment, geophysical and Drop-Down Video (DDV) surveys to identify any marine historic environment assets;
- A pre installation survey may be conducted to inform final cable routing and vessel anchoring areas which will seek to avoid any anthropogenic seabed features; and
- Stabilisation measures such as rock bags, split pipe, and/or concrete mattresses will be used to hold the cable in position. This will significantly reduce any cable movement and potential scour or disturbance of unknown archaeological remains over the lifetime of the Project.

5.2.2 Mitigation during installation:

- The *Contractor's* Offshore Manager will be the initial point of contact regarding archaeological interests.
- All wrecks or features of archaeological significance will be avoided by a buffer of $\geq 50\text{m}$ during detailed route design.
- The locations of wrecks and features of archaeological significance will be identified on electronic charts onboard the installation vessel and will be utilised to guide installation operations.
- The locations of any wrecks or features of archaeological significance will be provided to HES, and the MCA.

If required by licence, the Crown Estate's 'Protocol for Archaeological Discoveries' (PAD) (The Crown Estate, 2014) will be implemented during installation works.

6. INVASIVE NON-NATIVE MARINE SPECIES PLAN

6.1 Overview

It is common practice for offshore construction projects around the UK to manage the risk of introduction of non-native marine species. As such, all vessels involved in cable installation activities will be required to meet relevant legislative requirements and best standard practices with regards to ballasting activities and vessel biofouling management.

6.2 Regulatory Requirements

To prevent the risk of spread of non-native species through discharging of ballast water, all works will be carried out in accordance with The International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM).

The International Maritime Organisation (IMO) also aims to control and manage ships' biofouling through the implementation of the Guidelines for the control and management of ships' biofouling to minimise the transfer of invasive aquatic species (Biofouling Guidelines IMO 2023) (resolution MEPC.207 (62)). The Biofouling Guidelines state that a ship should implement biofouling management practices, including the use of anti-fouling systems and other operational management practices to reduce the development of biofouling. The intent of such practices is to keep the ship's submerged surfaces, and internal seawater cooling systems as free of biofouling as practical.

In addition, in 2014 Scottish Natural Heritage (now NatureScot) commissioned the production of guidance for producing site and operation-based plans for preventing the introduction of non-native species (Payne *et al.*, 2014).

The mitigation and management measures to be adopted to prevent the introduction of invasive non-native species are set out below:

6.3 Invasive Non-Native Marine Species Management Plan

In adopting management measures to prevent the introduction of invasive and non-native marine species, The *Contractor* will:

- Ballast water management
 - Ensure all vessels contracted to undertake works will be contractually obliged to adhere to relevant BWM measures as outlined above, where relevant and be surveyed and issued with an International Ballast Water Management Certificate.
 - Ballast Water Management Plans (BWMP) will be provided by contracted vessels in accordance with Regulation B-1 of the Convention, alongside Ballast Water Record Books as described by BWM Regulation B-2.
- Biofouling / antifouling
 - The *Contractor* will ensure that all vessels consider the requirements of Resolution MEPC.207(62) Guidelines for the Control and Management of Ships Biofouling to minimise the Transfer of Invasive Aquatic Species, including for example the implementation of a biofouling management plan, and records of biofouling management practices kept in a biofouling record book.
- Ensure all vessels (as appropriate) have an International Anti-Fouling System Certificate.

All vessels will be required to undertake pre use and post use checks, including the presence for marine growth. All equipment (such as ROVs etc.) will be required to be free from marine growth prior to mobilisation.

A baseline survey undertaken within the application corridor recorded the presence of one INNS, the polychaete (*Goniadella gracilis*). This species is recorded as a 'low' impact by the Water Framework Directive (WFD) UK Technical Advisory Group (UKTAG). Installation activities will not transport any notable quantities of sediment from one region to another and therefore do not present a pathway to spread this infaunal species.

7. WASTE MANAGEMENT PLAN

7.1 Overview

The principal waste generated from the works will include packaging, general waste, and wastewater. Hazardous wastes are possible in the form of used oils and chemicals. Under the Duty of Care as a waste producer, the failure to manage wastes generated from the Project, such as failure to segregate recyclables, also results in breaches of waste management legislation in addition to potential environmental impact.

In accordance with MARPOL (73/78) Annex V (as amended) every ship (certified to carry 15 persons or more), and vessel (of 400 gross tonnage (GRT) and above) involved in the Project will have a Waste Management Plan. The purpose of the vessel Waste Management Plan is to provide guidance to the Master and crew on board the ship on the procedures for collecting, storing, processing, and disposing of waste, including the use of the equipment on board. Vessel Waste Management Plans will detail the specific ship's equipment and arrangements, and the location of equipment operating manuals. The *Contractor* will be responsible for ensuring all measures of the waste management plan are adhered to during all phases of the installation works.

7.2 Waste Management Plan

7.2.1 General

- The only materials to be deposited on the seabed will be those detailed in the Marine Licence.
- All vessels engaged in the works will be equipped with waste storage facilities according to the IMO International Convention for the Prevention of Pollution from Ships (MARPOL). Standard vessels certified to carry 15 persons or more or of 400 GRT and above will have the following in place:
 - Waste management plan; and
 - Waste record book.
- No waste will be disposed of over the side of the vessel and all produced waste will be stored on board.
- All waste products and rubbish will be removed from the vessel and disposed of by a registered waste disposal company.
- Any debris or waste materials arising during the works will be removed from the vessel and disposed of by a registered waste disposal company.

7.2.2 Waste Reduction

The waste hierarchy of Prevention, Re-use, Recycle and Disposal will be adopted on the Project. The following measures will align the Project waste management with the hierarchy and reduce the amount of waste produced during construction:

- The appropriate volume of materials will be ordered;
- Excess materials will be returned to the supplier if possible;
- Re-usable materials will be identified on site and removed for storage and re-sale;
- Recyclable materials will be removed from site for processing in licenced facilities;
- There will be clearly located and defined storage areas for materials; and

- General information on waste will be provided in site inductions and toolbox talks with feedback welcomed.

7.2.3 Storage of Waste

The following methods have been identified in relation to storage of waste:

- Storage will be provided at suitable points for all waste streams including hazardous waste, liquid wastes and discarded smoking materials;
- Waste will be segregated as far as practically possible;
- Waste will be stored in secure covered containers which will be clearly labelled with the waste they hold e.g. wood, metal, plastics etc.;
- Liquid wastes will be stored in appropriately (portable or permanent) bunded facilities that hold the capacity of the container plus a contingency;
- Any hazardous waste will be stored in separate containers (further details on hazardous waste are provided below);
- Any odorous wastes will be temporarily stored in suitable containers and where possible, at a distance from any nearby sensitive receptors;
- All places of work will be kept clean and tidy. Waste will not be allowed to accumulate. All surplus material and waste are to be removed in a timely manner;
- Storage areas / containers will be monitored, and action taken if waste is piled too high; and
- Burning of waste is prohibited.

7.2.4 Hazardous (Special) Waste

“Hazardous waste” –any waste which contains properties that might make it harmful to human health or the environment. In Scotland, hazardous waste is referred to as Special Waste.

Special Waste could arise from the following sources:

- Maintenance of plant and machinery;
- Oily water waste;
- Oil filters;
- Oily rags;
- Oil absorbent pads etc.;
- Contaminated Marine Gas Oil (MGO);
- Biological Marine Material;
- Hydraulic oil; and
- Environmental spill recovery (small amounts only; larger volumes taken away directly for disposal).

All Special Waste will be segregated by type and from other waste streams.

All Special Waste oil will be stored in a bunded facility until such times that it is collected.

Used filters, rags and absorbents will be stowed in the special waste container in drums or waste oil bags.

7.2.5 Transporting Waste

There is a duty of care on the waste producer to make sure that waste is appropriately disposed of. The following measures have been identified to comply with the duty of care:

- All waste leaving the Project will be accompanied by a Waste Transfer Note (WTN) for non-hazardous waste or a Special Waste Consignment Note (SWCN) for hazardous waste. A copy of which will be retained for 2 (WTN) or 3 years (SWCN); and
- Waste contractors will be checked ahead of the works to ensure they have valid licences.

8. POLLUTION PREVENTION, SPILL RESPONSE AND CONTINGENCY PLAN

8.1 Overview

The *Contractor* will be responsible for ensuring all measures set out in the six technical Annexes of the International Convention for the Prevention of Pollution from Ships (MARPOL) are adhered to and appropriate management plans relating to each of the items above are produced and adhered to throughout the works. There are legislative requirements that stipulate specific requirements with regards to every ship (certified to carry 15 persons or more), and vessel (of 400 GRT and above). Not all vessels involved in the proposed works will be over 400 GRT. Vessels under 400 GRT, are not subject to the legislative requirements around ship waste. However, these vessels will be operated by a responsible competent *Contractor*.

8.2 Emergency Spill Response

All vessels 400 GRT and above require an approved SOPEP i.e. procedures and descriptions of actions to be taken in the event of an oil pollution incident. The SOPEP shall contain all information and operational instructions as required by the “Guidelines for the development of the Shipboard Oil Pollution Emergency Plan” as developed by the Organisation (IMO). The appendices contain names, telephone numbers etc., of all contacts referenced in the SOPEP, as well as other reference material.

The following measures have been identified regarding emergency spills:

- Work will stop immediately, and the source of the spill will be addressed where possible;
- Follow vessel SOPEP procedure and emergency spill response;
- Isolate the source of the spill / leak if safe to do so;
- Sources of ignition will be eliminated – in case of spilled substance being flammable;
- The spill will be contained as far as practicable using appropriate spill equipment;
- All spills will be reported to the appropriate authorities where applicable, including SSEN’s 30 minute reporting hotline;
- The Project team will be provided with emergency spill response training;
- Spill kits will be made available at fuel storage and refuelling locations and in individual plant vehicles and vessels; and
- Spill kits will be replaced after use.

The collected contaminant from a spill will be treated as hazardous (Special) waste and will be disposed of appropriately.

8.3 Monitoring and Record Keeping

The Control of Substances Hazardous to Health Regulations (COSHH) record for any chemicals stored on the Project will be kept and updated by the *Contractor* along with the data sheet for any COSHH Material, chemical or substance. Operating instructions must be prepared (under the use of current Material Safety Data Sheets (MSDS)). For all used hazardous substances a register must be maintained.

Records will be kept of all visual fuel and oil checks of plant and fuel and oil storage containers by the *Contractor*.

Records will be kept by the *Contractor* of all spills and actions taken will be noted. Lessons learned will be communicated as appropriate.

8.4 Pollution Prevention Measures Onshore (at Cable Landfall)

The pollution measures for the onshore activities are documented in the Ardmore – Loch Pooltiel CEMP (in preparation at the time of writing, **filename will be inserted when available**).

9. MONITORING AND REPORTING PLAN

9.1 Introduction

Monitoring and reporting of activities during the Project are required to ensure works are carried out as per legislation, consent and licence conditions and in line with the *Employer* requirements. This Section describes the monitoring and reporting activities that will be performed during the execution of the Project. These requirements are additional to the external communications requirements detailed in Section 3.

9.2 Monitoring During Cable Installation

All vessels used on the Project shall be fully compliant with the International Safety Management (ISM) Code and flag state requirements. Where ISM Code does not apply to a vessel used due to vessel size, the vessel operator shall ensure that the vessel has a suitably integrated Safety Management System in use on board the vessel.

Table 9-1 outlines a number of environmental documents / certificates the vessels will be expected to provide to comply with the environmental aspects of the Project work. Documentation will be required to be provided to the *Contractor* (where specified) ahead of operations and prior to HAZID so that any necessary amendments can be made in advance of works commencing. Pre-works vessel checks will be undertaken by the *Contractor*, to ensure all appropriate documentation is on board the vessel.

Table 9-1 Environmental Compliance Checklist

Aspect	Document	Action	Responsibility for Provision	Date completed/ reviewed or checked [HOLD: to be completed through works]
Marine Licence and related documentation	Marine Licence	Copy of Marine Licence to be on board vessel throughout works	Vessel	
	EPS Licence	Copy of EPS Licence to be on board vessel throughout works	Vessel	
	Basking Shark Licence	Copy of BS Licence to be on board vessel throughout works	Vessel	
	Marine CEMP (incorporating the MMPP)	Copy of Marine CEMP to be on board vessel throughout works	Vessel	
	FLMAP	Copy of FLMAP to be on board vessel throughout works	Vessel	
	MMO/PAM Records	If required, evidence presented during mobilisation	Vessel	

Aspect	Document	Action	Responsibility for Provision	Date completed/ reviewed or checked [HOLD: to be completed through works]
Water Protection	Shipboard Marine Pollution Emergency Plan (SOPEP)	Plan to be presented prior to the HAZID, and on-board vessel throughout works	Vessel	
	Ensure that materials are secured on deck	Evidence required at vessel audit	Vessel	
	All waste is required to be contained on board vessels for appropriate disposal on return to port	Evidence required at vessel audit	Vessel	
Oily Discharges	Oil Pollution Prevention Certificate	Certificate to be presented prior to the HAZID, and on-board vessel throughout works	Vessel	
	Oil Record Book	Record book to be on board vessel throughout works	Vessel	
Ballast Water Management (if applicable)	International Ballast Water Management Certificate	Certificate to be presented prior to the HAZID, and on-board vessel throughout works	Vessel	
	Ballast Water Management Plan	Plan to be presented prior to the HAZID, and on-board vessel throughout works	Vessel	
	Ballast Water Record Book	Record book to be on board vessel throughout works	Vessel	
Biofouling Management	International Anti-Fouling System Certificate	Certificate to be presented prior to the HAZID, and on-board vessel throughout works	Vessel	
	Biofouling Management Plan	Plan to be presented prior to the HAZID, and on-board vessel throughout works	Vessel	
	Biofouling Record Book	Record book to be on board vessel throughout works	Vessel	
Waste Management	Waste Management Plan	Plan to be presented prior to the HAZID, and on-	Vessel	

Aspect	Document	Action	Responsibility for Provision	Date completed/ reviewed or checked [HOLD: to be completed through works]
		board vessel throughout works		
	Waste Record Book	Record book to be on board vessel throughout works	Vessel	
	Controlled Waste Transfer Note / Special Waste Consignment Note	Notes to be on board vessel at vessel audit and throughout works	Vessel	

9.3 Reporting During/After Cable Installation

End of installation reporting

Reporting requirements for close out of licence to be added when the Marine Licence has been received.

9.4 Incident Response and Reporting

Incident response and reporting are not part of this CEMP; however, all incidents negatively impacting the environment are to be reported within 30 minutes to the SSEN Offshore Client Representative and the SSEN reporting hotline. The SSEN Offshore Client Representative will inform the *Employer's* Marine Consents Manager and the *Employer's* Project Manager. The SSEN 30-minute reporting hotline is 0800 107 3207.

REFERENCES

1 IMO (2023). Guidelines for the control and management of ship's biofouling to minimize the transfer of invasive aquatic species [online]. Available at:

<https://wwwcdn.imo.org/localresources/en/KnowledgeCentre/IndexofIMOResolutions/MEPCDocuments/MEPC.378%2880%29.pdf> [Accessed July 2025].

2 Payne, R.D., Cook, E.J. & MacLeod, A., 2014. Marine biosecurity planning: guidance for producing site and operation-based plans for preventing the introduction of non-native species., pp.1-39 [online]. Available at: <https://www.clydemarineplan.scot/wp-content/uploads/2016/05/Guidance-Biosecurity-Planning.pdf>. [Accessed July 2025].

3 The Crown Estate (2014). Protocol for Archaeological Discoveries: Offshore Renewables Projects [online]. Available at: https://www.wessexarch.co.uk/sites/default/files/field_file/2_Protocol%20For%20Archaeological%20Discoveries.pdf [Accessed July 2025]
