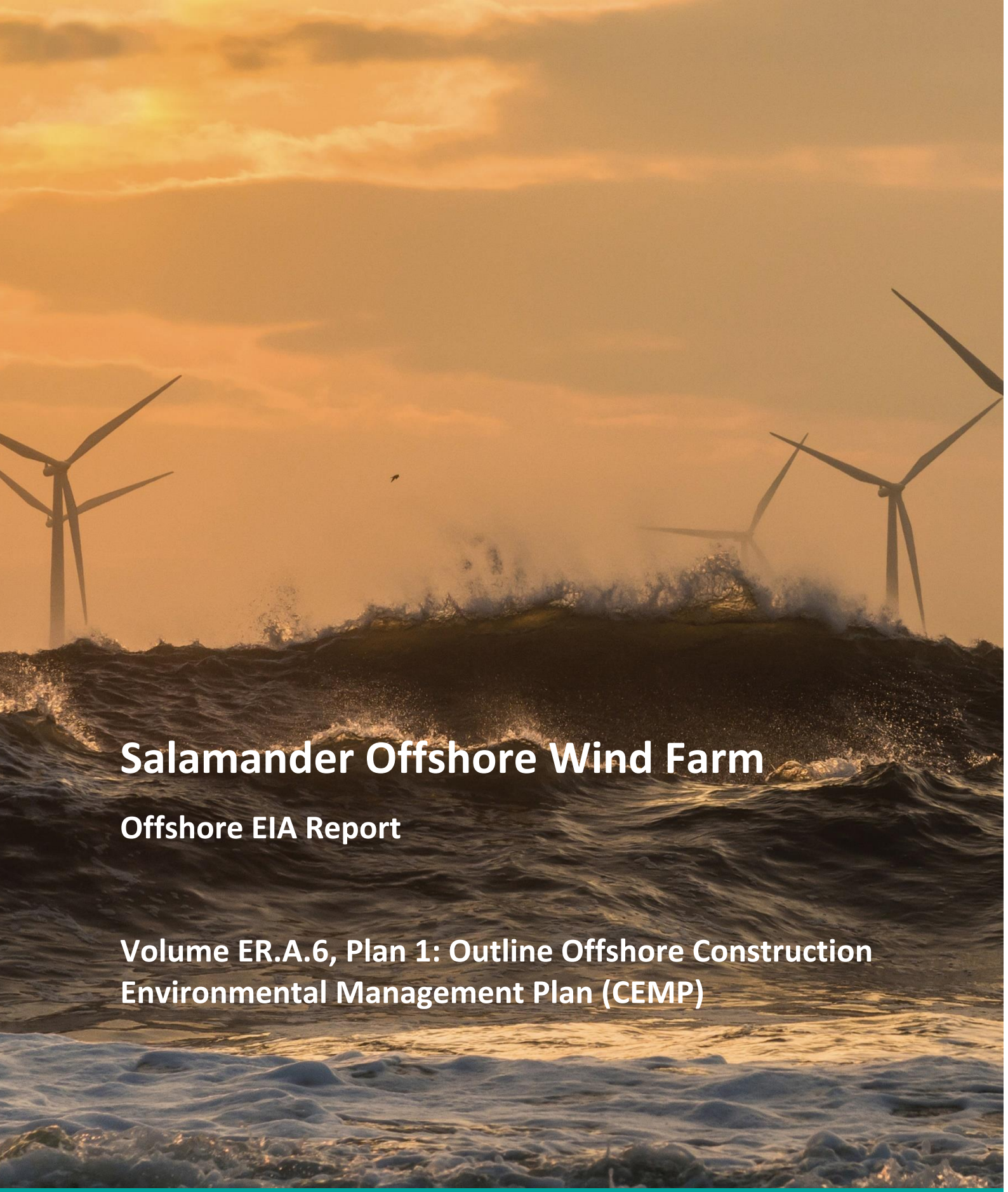

Salamander Offshore Wind Farm

Offshore EIA Report

Volume ER.A.6, Plan 1: Outline Offshore Construction Environmental Management Plan (CEMP)

SALAMANDER

Powered by Ørsted and
Simply Blue Group

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STOP!

In the event of a marine pollution incident, or where there is a threat of marine pollution – go immediately to Appendix B: Outline Marine Pollution Contingency Plan

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Acronyms

Term	Definition
ALARP	As Low As Reasonably Practicable
CEMP	Construction Environmental Management Plan
CGOC	Coastguard Operations Centre
DESNZ	Department for Energy Security and Net Zero
ERCoP	Emergency Response Cooperation Plan
EIAR	Environmental Impact Assessment Report
EMPs	Environmental Management Plans
EPC	Engineering, Procurement and Construction
EPS	European Protected Species
FLO	Fisheries Liaison Officer
HES	Health and Safety Environment
INNS	Invasive Non-Native Species
JNCC	Joint Nature Conservation Committee
JV	Joint Venture
km	Kilometres
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MMMP	Marine Mammals Mitigation Plan
MPCP	Marine Pollution Contingency Plan
MSN	Merchant Shipping Notice

MW	Megawatts
nm	Nautical Miles
OCNS	Offshore Chemical Notification Scheme
OEMP	Operational Environmental Management Plan
PAD	Protocol for Archaeology Discoveries
PEMP	Project Environmental Monitoring Programme
UXO	Unexploded Ordnance
SWPC	Salamander Wind Project Company (formerly called SBES)
SMWWC	Scottish Marine Wildlife Watching Code
VMP	Vessel Management Plan
WMP	Waste Management Plan
WSI	Written Scheme of Investigation

1 Introduction

1.1.1.1 This outline Construction and Environment Management Plan (CEMP) has been produced along with the Offshore Environmental Impact Assessment Report (EIAR) and aims to ensure general best practice measures are adhered to throughout construction.

1.2 Project Background

1.2.1.1 Salamander Wind Project Company Limited (SWPC) ('the Developer'), a joint venture (JV) partnership between Ørsted, Simply Blue Group and Subsea7, is proposing the development of the Salamander Offshore Wind Farm (hereafter 'Salamander Project'). The Salamander Project will consist of the installation of a floating offshore wind farm (up to 100 MW capacity) approximately 35 kilometres (km) east of Peterhead. It will comprise of up to seven wind turbine generators, associated floating foundations and moorings, subsea hubs and cabling. The export cabling will run from the Offshore Array Area to the Landfall where the marine cable will be jointed to the terrestrial cable.

1.2.1.2 The Salamander Project is applying for a Section 36 (S36) Consent and associated Marine Licences. The current schedule for the construction for the Salamander Project Offshore Development is expected to commence [TBC in full draft]. Construction works associated with the landfall are expected to commence on or after [TBC in full draft].

1.3 Purpose of the Outline CEMP

1.3.1.1 This outline CEMP will form the basis of the final CEMP. The final CEMP will be finalised and approved post-consent as part of condition discharge prior to construction by Scottish Ministers in accordance with the S36 Consent and associated Marine Licences. It sets out the framework and minimum arrangements for the environmental management of the Construction phase of the Salamander Project Offshore Development, including Landfall works, and has been produced to provide the framework to discharge the requirements of the relevant consents / licence conditions. From this point onwards, 'CEMP' refers to the final, approved CEMP.

1.3.1.2 The broad objectives of the CEMP are as follows:

- To provide a mechanism to ensure that measures to mitigate potentially adverse environmental impacts are implemented during all construction works;
- To promote and meet good construction practice standards throughout construction of the Salamander Project; and
- To provide a framework for compliance auditing and inspection to enable the Developer to be assured that the necessary levels of environmental performance are being met.

Table 1-1 Section 36 Consent and Marine Licence Conditions of Relevance to the CEMP

Licence/Consent	Condition	Details	Relevant Section
[To be added post-consent]			

1.3.1.3 The legislative requirements, current standards and best practice measures which define the standards of construction practice adhered to by the Contractors shall be outlined within the final CEMP. However,

adhering to the final CEMP does not absolve the Developer, Contractors, or Subcontractors from complying with legislation and bylaws relevant to their construction activities.

1.4 Approach to Amending and Updating the Approved CEMP

1.4.1.1 Once approved, the CEMP sets out the proposed environmental management framework and procedures that will be followed by all Contractors and Subcontractors during the construction and commissioning of the Salamander Project Offshore Development. Prior to the handover of the Salamander Project Offshore Development to the Operational Phase, the final CEMP will be reviewed and updated and an Operational Environmental Management Plan (OEMP) will become active. The operations and maintenance activities are therefore outside the scope of this document.

1.5 Implementation of the CEMP

1.5.1.1 The CEMP approved by Scottish Ministers will be integrated into the contracts for principal Contractors responsible for offshore works. All principal Contractors, Subcontractors, and their suppliers must adhere to the pertinent provisions of the detailed CEMP. They are obligated to furnish evidence detailing how they will guarantee the implementation and monitoring of the CEMP's requirements and will develop their own EMPs tailored to their tasks, ensuring compliance with the CEMP. Prior to construction, Contractor EMPs will be submitted to the Developer for review and approval to ensure conformity with the Salamander Project Offshore CEMP.

1.6 Scope of the CEMP

1.6.1.1 The approved CEMP will cover the following:

- Offshore personnel, roles and responsibilities and reporting structures in relation to environmental management, including for Contractors and Subcontractors; and
- The procedure for communicating and reporting any environmental compliance matters associated with the CEMP with the Marine Directorate – Licensing Operations Team (MD-LOT) and relevant stakeholders.

2 CEMP Content

2.1.1.1 This section outlines the content to be included within the CEMP.

2.2 Roles and Responsibilities

2.2.1.1 The roles and responsibilities of key personnel relevant to the CEMP are outlined in **Table 2-1**. More specific roles and responsibilities pertinent to key activities or aspects of this plan are detailed in the corresponding sections. These will be further refined and finalised post-consent. Key project contacts will be set out in **Appendix A: Contacts Database**.

Table 2-1 Roles and Responsibilities of the Salamander Project (*indicative for outline CEMP*)

Role	Responsibilities
Project Director	Overall responsibility for the delivery of the Salamander Project.
Engineering, Procurement and Construction (EPC) Director	Responsible for ensuring that the Salamander Project team adhere to relevant environmental consents, relevant legislation and company policy and processes.
Project Health Safety and Environment (HSE) Manager	Delivery of HSE elements including HSE performance and promoting safety leadership across the Salamander Project, encouraging an exemplary behavioural safety culture.
Construction Project Manager	Responsible for the technical delivery of the construction activities in relation to the offshore works and co-ordinating all construction works and ensuring health and safety standards on site.
HSE Advisor	Responsible for ensuring that the project team adhere to relevant HSE policy and processes, manages the site HSE teams, accountable for the reporting and investigation of HSE incidents. Also responsible for HSE site inductions and compliance with training and medical requirements for personnel / Contractors.
HSE Duty Holder	Duty Manager, available 24/7 to provide 1st line emergency response support.
Marine Co-Ordinator	Responsible for managing and coordinating vessel activity.
Package Managers	Package Managers will report to the EPC Director and have responsibility for the delivery of their respective Work Package.
Consent Manager	Overall responsibility for ensuring the Salamander Project remains compliant with the key project consents, that the relevant consent Conditions are discharged prior to the commencement of construction and that all Contractors are aware of and comply with the relevant consents. The Consent Manager is also responsible for liaising with the relevant licensing authorities.
Offshore Environmental Manager	Responsible for maintaining this CEMP and managing external resources relevant to this CEMP.
Environmental Liaison Officer	Responsible for environmental management, monitoring and communication of the CEMP.
Company Fisheries Liaison Officer (FLO)	Responsible for the dissemination of relevant vessel movements and updates on construction activities to the interested fisheries parties.
Fisheries Industry Representative (FIR)	Direct point of contact for the fishing industry and will support the FLO circulating information from the Salamander Project as required.
Client Representative	Represents the Client during offshore operations.

2.2.2 Contractor Responsibilities

2.2.2.1 This section in the CEMP shall set out relevant legislation applicable to vessels to be used in offshore construction works once identified.

2.2.2.2 It is the Contractor's responsibility to ensure that they conduct their activities in accordance relevant legislation.

2.2.3 Regulatory / Advisor Responsibilities

2.2.3.1 In the UK, there is a defined structure and procedure for responding to spill incidents which clearly defines the roles and responsibilities of Industry, UK Government (including environmental agencies), local Maritime Authorities, and MD-LOT as outlined in **Table 2-2**. In the case of the use of oil spill treatment products (i.e. dispersant) being requested, MD-LOT will grant approval following consultation with advisers on a range of topics.

Table 2-2 Regulatory Advisors and their Responsibilities

Role	Responsibilities
Marine Scotland Science	Advise on the likely impact of the pollution and potential responses.
NatureScot and Joint Nature Conservation Committee (JNCC)	Advise on the presence of protected and sensitive species and habitats which could be impacted by pollution <12 nautical miles (nm) and >12nm respectively.
Local MD-LOT Principal Marine Officer	Provides advice on fisheries, shellfisheries, marine conservation zones, marine licensing and dispersant use, but not dispersant approval which is a Headquarters function.
MD-LOT Headquarters	Responsible for the authorisation and approval of oil spill treatment products (dispersants).
Maritime and Coastguard Agency (MCA)	Responsible for counter pollution control.

2.2.4 Offshore Construction Method Statements

2.2.4.1 Before initiating specific tasks the principal Contractor will formulate Construction Method Statements. These statements will outline the planned construction operations, detailing construction methods, required equipment, and addressing associated environmental, health, and safety considerations. Identification of activities necessitating a method statement will be conducted through a risk-based approach during the detailed design phase.

2.2.5 Training

2.2.5.1 Every offshore construction staff member engaged in the Salamander Project Offshore Development will undergo training on their duties related to environmental reporting, mitigating environmental risks and implementing the measures within the CEMP.

2.2.5.2 The principal Contractors are obligated to guarantee that Contractors engage a workforce possessing suitable qualifications and experience. They will also take on the responsibility of identifying the training requirements of their personnel, facilitating the provision of appropriate training.

2.2.5.3 This training encompasses site inductions and briefings including toolbox talks designed to impart essential knowledge on health, safety, and environmental matters. It shall also cover the relevant environmental control measures pertinent to the specific tasks scheduled for the day.

2.2.5.4 Contractors are required to offer comprehensive training to all personnel, including those from Subcontractors. The training should encompass the content of their respective Contractor's Environmental Management Plans, aligning with the CEMP and all consents and licences for the Salamander Project Offshore Development.

2.2.5.5 Contractors will be responsible for keeping and furnishing training records to the Developer.

2.3 Routine Reporting, Notifications and Communications to Stakeholders

2.3.1.1 This section addresses the Salamander Project Offshore Development's regular reporting, notification, and communication procedures with MD-LOT and other relevant stakeholders. These actions are mandated as part of CEMP and are specified in the consent conditions.

2.3.1.2 **Table 2-3** describes the routine reporting obligations.

Table 2-3 Routine Salamander Project Reporting, Notification and Communications to Stakeholders

Activity	Summary of Requirement	Responsibility	Frequency
[To be added post-consent]			
e.g. Notice to Mariners			
Chemical usage reporting			

2.3.1.3 MD-LOT may also conduct periodic site inspections to monitor compliance with consents and approved Consent Plans. The Developer will facilitate access to all offshore construction activities for this purpose, with appropriate prior notification.

2.4 Environmental Incidents and Non-Compliance Procedures

2.4.1.1 The Contractor bears the responsibility of identifying and recording all environmental risks related to their activities throughout the Salamander Project Offshore Development works. They must ensure the implementation of appropriate controls and procedures to prevent spillage, environmental incidents, and non-compliance with Salamander Project Offshore Development consents / licences to the extent reasonably feasible, prior to commencing the works. Additionally, the Contractor is obligated to establish effective response and reporting processes in anticipation of any potential failure of preventive measures, to be activated in the event of spillage, environmental incidents, or non-compliance with the Salamander Project Offshore Development's consents / licences.

2.4.1.2 The Contractor will develop a Marine Pollution Contingency Plan (MPCP) in accordance with the Salamander Project's own **Marine Pollution Contingency Plan (Appendix B: Outline Marine Pollution Contingency Plan).**

2.4.1.3 The Developer will comply with all relevant legislation and that the works are undertaken with appropriate licences and permissions in place. The Developer shall continually monitor and audit the activities of

Contractors and Subcontractors and require that they too comply with all relevant legislation and any consent / licence conditions.

2.4.2 Recording and Documenting of Incidents

2.4.2.1 The Developer is committed to rapid and proportionate action and a proactive approach to learning in response to environmental incidents. To achieve this, prompt reporting of all environmental incidents is expected from all individuals and Contractors. This is in addition to any legal requirements or other recognised industry best practice.

2.4.2.2 Reporting requirements for spill incidents are detailed in **Appendix B**.

2.4.2.3 In case of other non-compliances, the Contractor must forward an environmental incident report to the HSE Site Manager within 24 hours of becoming aware of non-compliance. The incident report must describe the non-compliance and a description of how to make sure that the incident does not happen again.

2.4.2.4 A '*force majeure*' occurs when authorised substances / articles are deposited outside of the Order Limits or unauthorised substances / articles are deposited within or outside the offshore Order Limits. If, due to stress of weather or any other cause, the master of a vessel can determine that it is necessary to deposit the substances or articles to ensure the safety of human life and / or the safety of the vessel. Full details of the circumstances shall be notified to the MD-LOT by the Installation Manager / Client Representative or Vessel Master within 48 hours of the incident occurring.

3 Management of Environmental Aspects and Compliance Obligations

3.1 Overview

3.1.1.1 This section categorises the primary environmental aspects associated with the Construction phase and subsequently outlines the comprehensive approach for managing related environmental impacts, as delineated in the Salamander Project Offshore EIAR.

3.1.1.2 Where impacts have been identified in the EIAR, each Contractor must create a register of project environmental aspects and impacts to illustrate compliance with Salamander Project Offshore Development consents, licences, and Consent Plans, which will demonstrate relevant mitigation measures applied.

3.1.1.3 Likewise, each Contractor must generate a register of project environmental compliance obligations to showcase that pertinent legal and other requirements have been identified and are being effectively managed within the scope of their work.

3.2 Marine Species

3.2.1.1 In the event of a wildlife incident occurring as a result of activity associated with the Salamander Project Offshore Development (e.g. injury to a marine mammal, or an observed fish or bird mortality), the incident will be reported to the relevant person as soon as possible who will then follow up with the relevant regulatory authority (details of the reporting procedure will be provided in the CEMP post-consent).

3.2.1.2 The area around the Salamander Project Offshore Development may be visited regularly by marine species that are sensitive to noise disturbance. The Developer will ensure that all personnel adhere to the Scottish Marine Wildlife Watching Code (SMWWC), Vessel Management Plan (VMP) and any appropriate European Protected Species (EPS) Licence conditions during all Construction stages of the Salamander Project Offshore Development. The following documents will be prepared post-consent to manage and mitigate the effects on marine animals:

- Marine Mammals Mitigation Plan (MMMP); and
- Vessel Management Plan.

3.3 Marine Archaeology

3.3.1.1 The procedures to be followed on discovering any marine archaeology during the Construction and Operation and Maintenance phases of the Salamander Project Offshore Development are set out in **Volume ER.A.6 Plan P.4 - Written Scheme of Investigation (WSI) and Protocol for Archaeology Discoveries (PAD)**.

3.4 Marine Pollution Contingency Plan

3.4.1.1 The MPCP details the measures to be put in place to minimise any impacts due to the release of pollutants during Construction and Operation and Maintenance phases of the Salamander Project Offshore Development. These are set out in **Appendix B: Outline Marine Pollution Contingency Plan**.

3.5 Marine Invasive Non-Native Species

3.5.1.1 When implementing management measures to avert the introduction of invasive non-native species (INNS), the Salamander Project Offshore Development will:

- Through contractual conditions, work with all Contractors (and their Subcontractors) to adhere to the applicable and latest legislative requirements and guidelines in effect at the time of performing their tasks; and

- Through contractual conditions, will necessitate that Contractors (and their Subcontractors) develop EMPs delineating comprehensive procedures to preclude the introduction of INNS.

3.5.1.2 A Biosecurity Plan will be drafted post-consent which will highlight the required measures to prevent the introduction and/or spread of INNS as a result of the Salamander Project Offshore Development. The Developer will ensure appropriate biosecurity management practices are implemented during Construction, and Operation and Maintenance phases of the project by adhering to relevant legislation and applying NatureScot's guidance 'Marine Biosecurity Planning Guidance for Producing Site and Operation-Based Plans for Preventing the Introduction of Non-Native Species'.

3.6 Waste Management Plan

3.6.1.1 A Waste Management Plan (WMP) will be produced which will comprehensively outline all waste management procedures related to construction activities, and provide specifics on anticipated waste generation, and propose the methods intended for waste management. Further details on the WMP will be included in the CEMP.

3.6.1.2 Contractors (and their Subcontractors) will be required to submit their Waste Management Plans to the Salamander Project for approval before commencing any work.

3.7 Dropped Objects

3.7.1.1 The requirements regarding reporting of dropped objects that pose a hazard to safe navigation will be described in the CEMP prior to construction. For further information please refer to the MD-LOT dropped object and spill reporting forms (**Appendix B: Outline Marine Pollution Contingency Plan, Section 4**).

3.8 UXO Management

3.8.1.1 Unexploded Ordnance (UXO) could cause substantial environmental impact if activated during offshore operations. UXO clearance activities may be needed prior to offshore construction to reduce the risk to As Low As Reasonably Practicable (ALARP). Should UXO be identified during the pre-construction/UXO surveys, the Developer will be notified immediately along with the relevant authorities. Should UXO need to be cleared during the Construction phase, MD-LOT will be notified and a separate Marine Licence and EPS Licence will be applied for.

Appendix A: Contacts Database

Role	Name	Telephone	E-mail
Salamander Contacts			
[To be added post-consent]			
External Stakeholder Contact Details			
[To be added post-consent]			

Appendix B: Outline Marine Pollution Contingency Plan

1 Introduction

1.1.1.1 This Outline Marine Pollution Contingency Plan (MPCP) has been produced along with the Offshore Environmental Impact Assessment Report (EIAR) and outlines best practice measures and procedures to protect project personnel and to safeguard the environment in the event of an accidental pollution event arising from offshore operations relating to the Salamander Project Offshore Development.

1.2 Purpose of the Outline MPCP

1.2.1.1 This outline MPCP will form the basis of the final MPCP. The final MPCP will be finalised and adopted post-consent and approved as part of condition discharge prior to construction by Scottish Ministers in accordance with the S36 Consent and associated Marine Licences. It sets out the framework for pollution prevention measures and contingency plans throughout the construction and operation of the Salamander Project Offshore Development, and has been produced to discharge the requirements of the relevant consents / licence conditions. From this point onwards, 'MPCP' refers to the final, approved MPCP.

1.2.1.2 The broad objectives of the MPCP are as follows:

- To furnish details about the Salamander Project Offshore Development system designed to manage and mitigate the risk of pollution incidents arising from the Salamander Project; and
- To delineate the procedures to be adhered to in the event of a pollution incident.

1.3 Approach to Amending and Updating the Approved MPCP

1.3.1.1 Once approved, the MPCP sets out the proposed environmental management framework and procedures that will be followed by all Contractors and Subcontractors to manage and mitigate the risk of pollution incidents arising from the Salamander Project Offshore Development during all phases of the Salamander Project. Prior to the handover of the Salamander Project Offshore Development to the Operational Phase, the MPCP will be reviewed and updated and will become active.

1.4 Implementation of the MPCP

1.4.1.1 The MPCP approved by Scottish Ministers will be integrated into the contracts for principal Contractors responsible for offshore works. All principal Contractors, Subcontractors, and their suppliers must adhere to the pertinent provisions of the detailed MPCP. They are obligated to furnish evidence detailing how they will guarantee the implementation and monitoring of the MPCP requirements and will develop their own Environmental Management Plans (EMPs) tailored to their tasks, ensuring compliance with MPCP.

1.5 Scope of the MPCP

1.5.1.1 The final MPCP will cover the following:

- Offshore personnel, roles and responsibilities and reporting structures in relation to environmental management, pollution risk assessment and incident response, including for Contractors and Subcontractors; and
- The procedure for communicating and reporting any pollution incident matters associated with the MPCP with the Marine Directorate – Licensing Operations Team (MD-LOT) and relevant stakeholders;

1.6 MPCP Roles and Responsibilities

1.6.1.1 The roles and responsibilities of key personnel relevant to the MPCP are outlined in **Table 1-1**. More specific roles and responsibilities pertinent to key activities or aspects of this plan are detailed in the corresponding sections. These will be further refined and finalised post-consent.

Table 1-1 Roles and Responsibilities of the Salamander Project (*example for outline MPCP*)

Role	Responsibilities
Project Director	Overall responsibility for the delivery of the Salamander Project.
Engineering, Procurement and Construction (EPC) Director	Responsible for ensuring that the Salamander Project team adhere to relevant environmental consents, relevant legislation and company policy and processes.
Project Health Safety and Environment (HSE) Manager	Delivery of HSE elements including HSE performance and promoting safety leadership across the Salamander Project, encouraging an exemplary behavioural safety culture.
Construction Project Manager	Responsible for the technical delivery of the construction activities in relation to the offshore works and co-ordinating all construction works and ensuring health and safety standards on site.
HSE Advisor	Responsible for ensuring that the project team adhere to relevant HSE policy and processes, manages the site HSE teams, accountable for the reporting and investigation of HSE incidents. Also responsible for HSE site inductions and compliance with training and medical requirements for personnel / Contractors.
HSE Duty Holder	Duty Manager, available 24/7 to provide 1st line emergency response support.
Marine Co-Ordinator	Responsible for managing and coordinating vessel activity
Package Managers	Package Managers will report to the EPC Director and have responsibility for the delivery of their respective Work Package.
Consent Manager	Overall responsibility for ensuring the Salamander Project remains compliant with the key project consents, that the relevant consent Conditions are discharged prior to the commencement of construction and that all Contractors are aware of and comply with the relevant consents. The Consent Manager is also responsible for liaising with the relevant licensing authorities.
Offshore Environmental Manager	Responsible for maintaining this MPCP and managing external resources relevant to this MPCP
Environmental Liaison Officer	Responsible for environmental management, monitoring and communication of the MPCP
Company Fisheries Liaison Officer (FLO)	Responsible for the dissemination of relevant vessel movements and updates on construction activities to the interested fisheries parties.

Role	Responsibilities
Fisheries Industry Representative (FIR)	Direct point of contact for the fishing industry and will support the FLO circulating information from the Salamander Project as required.
Client Representative	Represents the Client during offshore operations

1.6.2 Contractor Responsibilities

1.6.2.1 All Contractors must ensure that their procedures align with the mitigation and management measures outlined in the CEMP and this Offshore MPCP, relevant to their contractual obligations. Contractors are obligated to create their own EMPs, incorporating Incident Response Procedures compliant with both this Offshore MPCP and the Salamander Project Offshore CEMP. Compliance with the Salamander Project Offshore CEMP is a contractual prerequisite, necessitating Contractors to formulate task-specific method statements and risk assessments within their EMPs.

1.6.3 Construction and Operational Vessels

1.6.3.1 The Developer will work with Contractors to ensure that all construction and operational vessels adhere to the pertinent and obligatory recognised standards, in addition to complying with the applicable international maritime rules, as endorsed by the relevant flag state, and regulations.

1.6.3.2 The Developer will insist that all construction and operational vessels adhere to the procedures and specifications outlined in this MPCP and the Vessel Management Plan (VMP).

2 Pollution Sources and Risk Assessment

2.1 Introduction

2.1.1.1 This section will provide information on the potential sources of pollution, the associated level of risk, and the level of response likely to be required, based on the tier classification detailed below. It will also detail any control measures and monitoring requirements that have been established to mitigate against possible pollution events, in line with measures identified within the Salamander Project Offshore EIAR.

2.2 Spill Scenarios, Prevention and Control Measures

2.2.1.1 The potential occurrence of spills is determined by the hydrocarbon and chemical inventories present on vessels and offshore installations. In practice, the implementation of precautions such as training, operating procedures, and engineered solutions significantly reduces the likelihood of large spills, with the majority expected to be of a smaller scale.

2.2.1.2 A concise risk assessment will be conducted for potential spill scenarios. This risk assessment will be regularly updated, as needed, to ensure an evaluation of worst-case spill scenarios. Furthermore, a review and potential update will occur following the completion of the Construction phase to maintain relevance for the Operational phase.

2.2.1.3 In the realm of general oil spill response, a common approach involves categorising response levels into three tiers based on the spill's severity and the resources needed for mitigation. These tiers are defined as follows:

- Tier 1 response pertains to immediate on-site resources tailored for the most frequently anticipated oil spills.
- Tier 2 response is designed for larger oil spills that are less frequently anticipated, requiring regional external resources for monitoring and clean-up.
- Tier 3 response is reserved for exceptionally rare, major oil spills that may necessitate national and international resources to safeguard vulnerable areas and facilitate the clean-up process.

2.3 Likelihood and Consequences

2.3.1.1 The traditional perception of a Tier 3 scenario typically involves an extensive oil spill, such as one resulting from a significant maritime accident, an oil well blowout, or another infrequent yet highly impactful incident. Nevertheless, a Tier 3 response may also become necessary for smaller volumes. This could occur in situations where Tier 2 arrangements are notably absent or overwhelmed, areas of high sensitivity are at risk, or specialized strategies are required that are not locally available.

2.3.1.2 Upon entering the marine environment, spilled oil promptly undergoes weathering—a term encompassing various natural, physical, chemical, and biological changes. These alterations can significantly impact the effectiveness of response options. The ultimate fate of the spilled oil is determined by prevailing meteorological and oceanographic conditions, along with the type of oil involved.

2.4 Vessel to Vessel Refueling

2.4.1.1 Practices employed for refueling vessels at sea must adhere to industry standards and relevant legislation.

2.4.1.2 Merchant Shipping Notice (MSN) 1829, titled "Ship to Ship Transfer Regulations 2010/2012" (MCA, 2012), outlines detailed requirements for Ship to Ship Transfers involving a cargo predominantly consisting of oil. This Notice holds statutory authority through the Merchant Shipping (Ship to Ship Transfers) Regulations 2010 (as amended) and should be interpreted in conjunction with those Regulations. The Regulations specify

the particulars of permissible and impermissible transfers, along with the penalties for any offenses committed.

2.4.1.3 It's important to note that these regulations exclusively pertain to transfers between vessels and do not govern transfers from a vessel to an offshore or renewable energy installation. Transfers of fuel from vessels to such installations should be conducted with meticulous attention to crew and vessel safety, incorporating suitable environmental safeguards.

2.5 Use of Chemicals

2.5.1 List of Notified Chemicals

2.5.1.1 The compilation of Notified Chemicals, is a result of the Offshore Chemical Notification Scheme (OCNS). This scheme oversees the utilisation and release of chemicals in the UK and Netherlands offshore petroleum sectors, and is extended to the offshore renewables industry where applicable and applied to the offshore wind industry in the absence of specific guidance and legislation. In the UK, the Department for Energy Security and Net Zero (DESNZ) regulates this scheme, drawing upon scientific and environmental guidance from Cefas and Marine Directorate.

2.5.1.2 The OCNS does not encompass all chemicals. Certain common items, like specific types of lubricants and oils, will not be included in the list of notified chemicals for transfer and usage.

2.5.1.3 The OCNS is relevant to all chemicals employed in the exploration, exploitation, and associated offshore processing of petroleum on the UK Continental Shelf. It encompasses "operational" chemicals or products that, by virtue of their usage, are anticipated to be discharged to some extent. This includes substances like rig washes, pipe dopes, jacking greases, and hydraulic fluids utilized in controlling wellheads and blow-out preventers. Not only chemicals used in the actual hydrocarbon production process but also those generated offshore, such as sodium hypochlorite, must be subject to notification.

2.5.1.4 It's important to note that the scheme does not extend to chemicals typically used on vessels, helicopters, or other offshore structures. Additionally, products confined solely to domestic accommodation areas—such as additives in potable water systems, paints, coatings, fuels, lubricants, fire-fighting foams, and hydraulic fluids for cranes and machinery—are exempt from the scheme's requirements and are therefore not on the list of notified chemicals, but may still be used as agreed with MD-LOT.

2.5.2 Estimated Hydrocarbon and Chemical Inventory

2.5.2.1 At this stage, it is not possible to provide accurate, reliable details concerning volumes of estimated hydrocarbon and chemicals used. Once designs are complete, and construction methods finalised, a full inventory containing specific details of hydrocarbons and chemicals will be included.

3 Marine Pollution Incident Response Procedures

3.1 Introduction

3.1.1.1 This section outlines the procedures to be followed in the event of a marine pollution incident. In the event of a spill, the primary focus is on taking measures to ensure the safety of personnel, offshore installations, and vessels, and to prevent the incident from escalating. In cases where a spill is part of a broader emergency, such as a fire or explosion, the Emergency Response Cooperation Plan (ERCoP) should also be consulted.

3.2 Spills– Response and Notification

3.2.1.1 All spills, regardless of size, must be reported directly to the Coastguard Operations Centre (CGOC of the Maritime and Coastguard Agency (MCA)) followed up by email/phone call/radio to ensure it was received. In addition, the Primary Responder (Vessel Master on a vessel, Construction Site Manager at Landfalls) is required to maintain an incident log throughout the event from first report to stand down, which will be required during post incident analysis. A verbal notification should be followed, when feasible, by the submission of a Marine Pollution Report (CG77 POLREP) via email (or fax) to the CGOC and the Marine Coordinator.

3.2.1.2 The CG77 POLREP form detailed in **Section 4** has been produced to guide the person reporting the spill, on the level of detail likely to be required by the MCA. Note that it is not compulsory to have all the information but is beneficial to complete as much as possible.

3.2.1.3 In the event that a regional or national (Tier 2 or 3) response is deemed necessary, the MCA may assume control of the situation and implement the National Contingency Plan.

3.2.1.4 Post-incident, the Developer will collaborate with pertinent Contractors through a lessons-learned process. This involves reviewing and updating procedures as deemed necessary.

3.3 Spill Classification

3.3.1.1 The chosen response strategy in the event of a spill will be contingent upon various factors:

- The size and characteristics of the spilled oil/chemical;
- The probable and predicted behaviour of the oil/chemical in the sea;
- Consideration of environmental sensitivities in the path of the oil/chemical; and
- Evaluation of the consequences of different response options on the environment as a whole if implemented.

3.3.1.2 Oil spills will be categorized following the internationally recognized three-tier oil spill classification system. For chemical spills, classification will be based on the chemical's characteristics and its behavior upon release into the marine environment, including whether it evaporates, floats on the water surface, dissolves in the water, or sinks to the seabed.

3.4 Response Strategy

3.4.1 Strategy Selection

3.4.1.1 The selection of the suitable response strategy hinges not only on the potential constraints of each available response option but also on the type of oil spilled and the environmental sensitivities that may be at risk due

to the spill. The table provided below outlines the response strategies that will be employed on the UK Continental Shelf (UKCS), categorized by spill Tier and oil type.

Table 3.1 Response Strategies in accordance with Tier and oil type

Tier and Resources	Response Strategy	
	Non-persistent Oil (MGO and Diesel)	Persistent Oil (Hydraulic and Lube Oils)
Tier 1	[To be added post-consent]	[To be added post-consent]
Tier 2	[To be added post-consent]	[To be added post-consent]
Tier 3	[To be added post-consent]	[To be added post-consent]

4 Spill Response and Dropped Objects Forms

CG77 POLREP Initial Incident Report Form

A. Classification: -	
B. Date/Time/Observer: -	
C. Position and Extent of Pollution: -	
D. Tide: - Wind: -	
E. Weather: -	
F. Characteristics of Pollution: -	
G. Source and Cause of Pollution: -	
H. Details of Vessels in area: -	
I. Not Used	
J. Any Photographs or Samples: -	
K. Remedial Action: -	
L. Forecast of oil movement: -	
M. Names of others informed: -	
N. Other relevant information: -	

Guidance is given below on the type of information to be recorded in a CG77 POLREP:

A. Classification: - Select – Doubtful, Probable, Confirmed

B. Date/Time/Observer: - Enter date/time of obs. – state UTC or local time / Enter name or title of observer

C. Position and Extent of Pollution: - by latitude and longitude if possible, state range and bearing from some prominent landmark and estimated amount of pollution, e.g. size of polluted area; number of tonnes of spilled oil; or number of containers, drums etc. lost. When appropriate, give position of observer relative to pollution

D. Tide: - Speed/Direction Wind: - Speed/Direction

E. Weather: - Conditions and Sea State

F. Characteristics of Pollution: - give type of pollution, e.g. oil crude or otherwise; packaged or bulk chemicals; garbage. For chemicals, give proper name or United Nations Number, if known. For all, give appearance e.g. liquid; floating solid; liquid oil; semi-liquid sludge; tarry lumps; weathered oil; discoloration of sea; visible vapour etc.

G. Source and Cause of Pollution: - from vessels or other undertaking. If from a vessel, say whether as a result of apparent deliberate discharge or a casualty. If the latter, give a brief description. Where possible, give name, type,

size, nationality and Port of Registry of polluting vessel. If vessel is proceeding on its way, give course, speed and destination, if known.

H. Details of Vessels in area: - to be given if the polluter cannot be identified and the spill is considered to be of recent origin.

I. Not Used

J. Any Photographs or Samples: - Give details of any photographs or samples taken.

K. Remedial Action: - Give details of any actions taken, or intended, to deal with spillage.

L. Forecast: - Likely effects of pollution – e.g. arrival on shore and estimated timings.

M. Names: - of others informed apart from addressees to this message.

N. Other relevant information: - e.g. Names of other witnesses or references to other instances of pollution which may point to a source.

Reference Number:
Version: 01

DROPOB1 - OFFSHORE WIND & MARINE RENEWABLES DROPPED OBJECTS FORM

Marine Directorate notification pro-forma for reporting the dropped materials from the offshore wind/marine renewables industry at sea

This DROPOB1 form should be completed in conjunction with the 'Dropped Objects Policy Guidance'. This DROPOB1 must be submitted electronically to the organisations listed below no later than 24 hours after the event takes place (or as soon as possible where there is likely to be a significant hazard to other sea users). In circumstances where not all the information is available within 24 hours, the form should be submitted and can be updated at a later time.]

Marine Scotland	**MS.MarineRenewables@gov.scot**
Local HM Coastguard Station(s)	**[dependent on location of dropped object]**
Maritime & Coastguard Agency	navigationsafety@mcga.gov.uk
Kingfisher at Seafish	kingfisher@seafish.co.uk
Northern Lighthouse Board	Navigation@nlb.org.uk
UK Hydrographic Office (UKHO)	sdr@ukho.gov.uk
Navigational Warnings at UKHO	navwarnings@btconnect.com
Scottish Fisherman's Federation	PON2@sff.co.uk
Where geographically relevant:	
West Coast RIFG	Alastair.mcruaraidh.mcneill@gmail.com
Outer Hebrides RIFG	duncan@craigard.co.uk
Orkney Management Group	orkneyfisheries@btconnect.com
Shetland Shellfish Management Organisation	carole@ssmo.shetland.co.uk

Reporter details		Date of report:
Full name:	**Position/Title:**	
Contact telephone no:	**Contact e-mail:**	
Operator/Organisation/Company responsible for dropped object:		

Name licensee or vessel responsible for dropped object	
Location/position at the time of dropping object:	
Latitude:	**Longitude:**
Date dropped:	**Time (24hours):**
Weather conditions at time:	**Depth of sea (metres):**
Wind direction (0-360 degree):	**Wind speed (knots):**
Beaufort scale: **Tide rate/direction:**	**Wave height (metres):**

Reference Number:
Version: 01

Dropped object(s) – provide full description. Materials involved, function of object, dimensions etc. Provide photos if available.	Dropped objects:
If the materials are resting on the seabed are they near offshore assets? **If yes please provide details:**	
Are the materials likely to float on sea surface or in water column? **If no, estimated clearance over object:**	
If the answer to question above is yes - are materials likely to reach shore or cross an international border? - please specify	
Reasons for dropping object(s)	
What are the plans to recover the materials? Please specify details, including anticipated timescales for the recovery operation. If there are no plans to recover the materials the reason for this must be clearly specified.	
What are considered to be the risks and dangers to other users of the sea as a result of the lost or dumped materials not being recovered?	
Any further information that may be useful:	
In addition to those mandatory stated at the top of this form, please list the organisations that you have / will copy this form to:	

Reference Number:
Version: 01

For internal Marine Directorate use only:	
Incident history:	
Date of notification:	
Actions taken:	
Final action:	
Confirmation that case is closed : ☐	
Name of person closing the dropped objects case:	
Date closed:	
Reason for closing case:	
MS – Compliance/Fisheries/Renewables	
SFF	
NFFO	
IFGs	
MCA	
Kingfisher	
NLB	
UKHO	