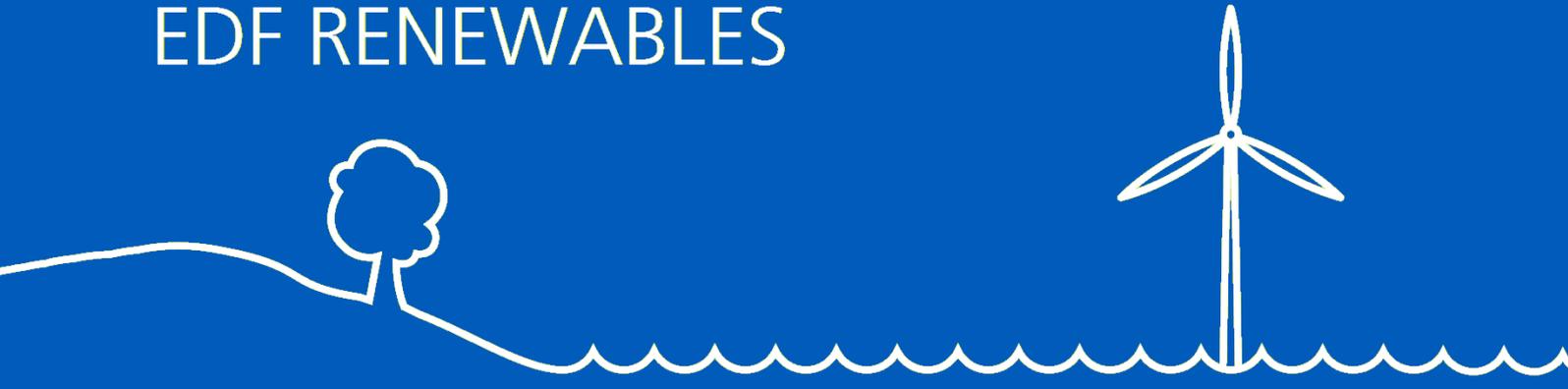


# EDF RENEWABLES



## Neart na Gaoithe Offshore Wind Farm

Offshore Transmission Infrastructure Environmental Management  
Plan

December 2025

Rev 01

DOCUMENT REFERENCE: NNG-NNG-ECF-PLN-0018



# Neart na Gaoithe Offshore Wind Farm Offshore Transmission Infrastructure Environmental Management Plan

Pursuant to Marine Licence (Offshore Transmission Works) Condition 3.2.2.10  
For the approval of the Scottish Ministers

## Document Control

SIGN OFF		
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# Plan Overview

## Purpose and Objectives of the Plan

This Offshore Transmission Infrastructure Environmental Management Plan (OfTI EMP) has been prepared to address the specific requirements of the relevant conditions attached to the Marine Licence issued to Neart na Gaoithe Offshore Wind Limited (NnGOWL).

The overall objective of the OfTI EMP is to provide the overarching framework for environmental management during the construction and operation and maintenance of the Neart na Gaoithe Offshore Wind Farm and Offshore Transmission Works (OfTW) (collectively referred to as the Project). In line with the divestment of the offshore transmission infrastructure (OfTI), this plan has been updated to detail the measures that will be put in place to safeguard environmental interests during operation and maintenance (O&M) of the OfTI.

The OfTI EMP is designed to provide practical guidance to those involved in the construction and operation of the OfTI, including NnGOWL personnel, Contractors and NnGOWL's Environmental Clerk of Works (ECoW), on the series of measures to mitigate or manage environmental impacts based on commitments made by NnGOWL and the requirements of the Offshore Consent conditions.

All NnGOWL personnel and Contractors involved in the Project must comply, as a minimum, with this OfTI EMP until such time as the divestment of the OfTI assets to the Offshore Transmission Owner (OfTO). Upon transfer of ownership, the OfTO will be responsible for updating and implementing the relevant elements of this OfTI EMP.

A separate OMP has been prepared for the Wind Farm assets, namely the wind turbines, wind turbine jacket foundations, inter-array cables and interconnector cable.

## Scope of the Plan

In line with the requirements of the consents conditions, and in line with industry standards and good practice, the OfTI EMP covers the following:

- The roles and responsibilities of key Project personnel with respect to environmental management;
- Mechanisms for reporting to the Scottish Ministers/Licensing Authority and stakeholders on environmental issues and compliance with the OfTI EMP.
- Mitigation measures to prevent adverse impacts to environmental interests with reference to relevant measures detailed in the wider OfTI Consent Plans;
- Chemical usage measures;
- Measures to prevent the introduction of marine non-native invasive species;
- Procedures for dealing with dropped objects;
- Procedures for dealing with Unexploded Ordnance (UXO);
- Pollution prevention and contingency measures; and
- Waste management measures.

## Structure of the Plan

Sections 1 and 2 set out the scope and objectives of the OfTI EMP, details the process for making updates and amendments to this document and sets out broad statements of compliance.

Section 3 details the wind farm layout, key constraints and key design parameters associated with the wind farm and inter-array cables.

Section 4 sets out the overarching EDF Power Solutions UK and Ireland (referred to as EDF throughout the remainder of this document) environmental policy objectives and the roles and responsibilities of NnGOWL personnel and the contractors engaged on the Project. The lines of communication and chains of command along with reporting requirements are also described.

Section 5 presents a series of measures to mitigate or manage environmental impacts based on commitments made by NnGOWL and the requirements of the Marine Licence conditions. Specific measures are set out to manage issues identified within the Marine Licence conditions, including marine pollution, chemical usage, invasive non-native species, waste, and dropped objects.

The accompanying Annexes present a compliance register and a Marine Pollution Contingency Plan, which are intended to support the application of measures set out in the OfTI EMP.

## Plan Audience

The OfTI EMP is intended to be referred to by personnel involved in the construction and the O&M of the OfTI, including NnGOWL personnel and Contractors. All method statements and environmental management documents produced in relation to the OfTI must comply with this OfTI EMP.

Compliance with this OfTI EMP will be monitored by the NNGOWL consents team, NnGOWL's ECoW, and the Marine Directorate Licensing Operations Team (MD-LOT). This document will be accessible by the NnG Control Centre and any relevant contractors as required.

# Contents

1	Introduction .....	13
1.1	Background.....	13
1.2	Objectives of the Plan.....	13
1.3	Linkages with other Consent Plans.....	18
1.4	OfTI EMP Document Structure .....	19
2	NnGOWL Statements of Compliance .....	21
2.1	Introduction.....	21
2.2	Statements of Compliance .....	21
3	Project Overview.....	22
4	Environmental Management Framework.....	24
4.1	NnGOWL Health, Safety and Environment Policy and Objectives .....	24
4.2	Environmental Policy and Objectives .....	25
4.3	OfTI EMP Roles, Responsibilities and Chain of Command - Construction Phase.....	25
4.4	OfTI EMP Roles, Responsibilities and Chain of Command - O&M Phase Prior to OfTO.....	32
4.5	OfTI EMP Staff Competence, Training and Awareness .....	36
4.6	OfTI EMP Communications and Reporting .....	37
4.7	Monitoring of OfTI EMP Performance and Compliance (Construction Phase).....	42
4.8	OfTI EMP Document Management (Construction Phase) .....	42
4.9	OfTI EMP Document Management (Operational Phase).....	43
5	Environmental Management and Mitigation Measures .....	44
5.1	EIA Report Compliance Register .....	44
5.2	Minimise Risk of Vessel Disturbance .....	44
5.3	Chemical Usage .....	45
5.4	Invasive Non-Native Marine Species .....	47
5.5	Seabed Deposits and Notification of Dropped Objects .....	49
5.6	Unexploded Ordnance .....	51
5.7	Pollution Prevention and Contingency Planning .....	51
5.8	Waste Management.....	51
	Annexes.....	55
	Annex 1 - NnGOWL Application Commitments Register.....	55
	Annex 2 – Construction Phase Marine Pollution Contingency Plan .....	67
	Annex 3 – Operational Phase Marine Pollution Contingency Plan .....	68

## Figures

Figure 3-1: Wind Farm Area and Offshore Export Cable Corridor locations .....	23
Figure 4-1: NnGOWL Organogram and lines of communication relevant to this OfTI EMP .....	26
Figure 4-2: NnGOWL Organogram and lines of communication relevant to this OfTI EMP .....	33
Figure 5-1 Waste Hierarchy (Source: Scottish Government, 2009) .....	54

## Tables

Table 1-1 : Consent conditions to be discharged by this OfTI EMP .....	14
Table 1-2 : Other consent conditions relevant to this Consent Plan .....	16
Table 1-3: OfTI EMP consistency with and links to other Consent Plans .....	18
Table 1-4 : OfTI EMP document structure .....	19
Table 4-1: HSE Management Standards that will be implemented during Construction and Operation of the Project .....	24
Table 4-2: Key responsibilities of the Project Director relevant to this OfTI EMP .....	27
Table 4-3: Key responsibilities of the HSE Manager relevant to this OfTI EMP .....	27
Table 4-4: Key responsibilities of the Health and Safety Advisor relevant to this OfTI EMP .....	27
Table 4-5: Key responsibilities of the Construction Manager relevant to this OfTI EMP .....	28
Table 4-6: Key responsibilities of the Package Managers relevant to this OfTI EMP .....	28
Table 4-7: Key responsibilities of the Contractors relevant to this OfTI EMP .....	29
Table 4-8: Key responsibilities of the Development Manager relevant to this OfTI EMP .....	29
Table 4-9: Key responsibilities of the Offshore Consents Manager relevant to this OfTI EMP .....	30
Table 4-10: Key responsibilities of the Environmental Clerk of Works relevant to this OfTI EMP .....	30
Table 4-11: Key responsibilities of the Company Fisheries Liaison Officer relevant to this OfTI EMP .....	31
Table 4-12: Key responsibilities of the Archaeological Consultant relevant to this OfTI EMP .....	32
Table 4-13: Key responsibilities of the O&M Manager relevant to this OfTI EMP .....	34
Table 4-14: Key responsibilities of the Asset Manager relevant to this OfTI EMP .....	34
Table 4-15: Key responsibilities of the O&M Production Manager relevant to this OfTI EMP .....	34
Table 4-16: Key responsibilities of the Health and Safety Advisor relevant to this OfTI EMP .....	34
Table 4-17: Key responsibilities of the Offshore Environment Manager relevant to this OfTI EMP .....	34
Table 4-18: Key responsibilities of the NnG Control Room Supervisors / Operational Coordinators relevant to this OfTI EMP .....	35
Table 4-18: NnGOWL incident reporting procedures .....	42
Table 5-1: Potential chemicals spill scenarios and control measures to be implemented during construction. ....	45
Table 5-2: Legislation and guidance relating to the management and control of INNS .....	47
Table 5-3: Dropped object process and remediation process. ....	50

Table 5-4: Relevant waste management legislation that will be complied with during construction and operation and maintenance .....52

# Acronyms and Abbreviations

TERM	DESCRIPTION
AC	Alternating Current
ADDs	Acoustic Deterrent Devices
AEZ	Archaeological Exclusion Zone
AFS	Anti-Fouling System
BEIS	Department of Business, Energy and Industrial Strategy
BWM Convention	Convention for the Control and Management of Ships' Ballast Water and Sediments
COSHH	Control of Substance Hazardous to Health
DSFB	District Salmon Fisheries Board
ECoW	Environmental Clerk of Works
EMF	Electromagnetic Fields
EU	European Union
F-Gases	Fluorinated gases
FLO	Fisheries Liaison Officer
FMS	Fisheries Management Scotland
FTCFWG	Forth and Tay Commercial Fisheries Working Group
FTRAG	Forth and Tay Regional Advisory Group
HSE	Health, Safety and Environment
HSSE	Health, Safety, Security and Environment
IALA	International Association of Marine Aids to Navigation and Lighthouse Authorities
IMO	International Maritime Organisation
INNS	Invasive Non Native Species
JNCC	Joint Nature Conservation Committee
MCA	Maritime and Coastguard Agency
MEPC	Marine Environment Protection Committee

TERM	DESCRIPTION
MHWS	Mean High Water Spring
MMO	Marine Mammal Observer
MMMP	Marine Mammal Monitoring Plan
MD-LOT	Marine Directorate Licensing Operations Team
NLB	Northern Lighthouse Board
NtMs	Notice to Mariners
OCNS	Offshore Chemical Notification Scheme
OftI	Offshore Transmission Infrastructure
OftO	Offshore Transmission Owner
O&M	Operation and Maintenance
OSP	Offshore Substation Platforms
OSPAR Convention	Convention for the Protection of the Marine Environment of the North-East Atlantic
PAM	Passive Acoustic Monitoring
ROV	Remote Operated Vehicle
RSPB	Royal Society for the Protection of Birds
RTC	River Tweed Commission
SDS	Safety Data Sheet
SEPA	Scottish Environmental Protection Agency
SMWWC	Scottish Marine Wildlife Watching Code
SFF	Scottish Fishermen’s Federation
TAR	Transportation Audit Report
UXO	Unexploded Ordnance
WDC	Whale and Dolphin Conservation
WFD	Waste Framework Directive

## Defined Terms

TERM	DESCRIPTION
<b>Addendum</b>	The Addendum of Additional Information submitted to the Scottish Ministers by NnGOWL on 26 July 2018.
<b>Application</b>	The Environmental Impact Assessment Report, Habitats Regulations Appraisal Report submitted to the Scottish Ministers by NnGOWL on 16 March 2018; the Addendum of Additional Information submitted to the Scottish Ministers by NnGOWL on 26 July 2018 and the Section 36 Consent Variation Report dated 08 January 2019.
<b>Company</b>	Near na Gaoithe Offshore Wind Limited (NnGOWL) (Company Number SC356223). NnGOWL has been established to develop, finance, construct, operate, maintain and decommission the Project.
<b>Consent Conditions</b>	The terms that are imposed on the Company under the Marine Licence that must be complied with
<b>Consent Plans</b>	The plans, programmes or strategies required to be approved by the Scottish Ministers (in consultation with appropriate stakeholders) in order to discharge the Consent Conditions.
<b>Contractors</b>	Any Contractor/Supplier (individual or firm) working on the Project.
<b>EIA Report</b>	The Environmental Impact Assessment Report, dated March 2018, submitted to the Scottish Ministers by NnGOWL as part of the Application.
<b>Inter-array Cables</b>	The offshore cables connecting the wind turbines to one another and to the OSPs.
<b>Interconnector Cables</b>	The offshore cables connecting the OSPs to one another.
<b>Marine Licence</b>	OfTW (Licence Number MS-00009831), dated 4 June 2019 and 26 May 2022 respectively.
<b>Offshore Consents</b>	The Section 36 Consent and the Marine Licences.
<b>Offshore Export Cable Corridor</b>	The area within which the offshore export cables are to be located.
<b>Offshore Export Cables</b>	The offshore export cables connecting the OSPs to the landfall site.
<b>OfTI</b>	The Offshore Transmission Infrastructure comprising the OSPs, and offshore export cables required to connect the Wind Farm to the Onshore Transmission Works at the landfall.
<b>OfTI Area</b>	The area outlined in red and blue in Figure 1 attached to Part 4 of the OfTW Marine Licence.
<b>OnTW</b>	The onshore transmission works from landfall and above Mean High Water Springs, consisting of onshore export cables and the onshore substation.
<b>Project</b>	The Wind Farm and the OfTI.

TERM	DESCRIPTION
<b>Section 36 Consent</b>	The written consent granted on 3 December 2018 by the Scottish Ministers under Section 36 of The Electricity Act 1989 to construct and operate the Wind Farm, as varied by the Scottish Ministers under section 36C of the Electricity Act 1989 on 4 June 2019.
<b>Section 36 Consent Variation Report</b>	The Section 36 Consent Variation Report submitted to the Scottish Ministers by NnGOWL as part of the Application as defined above on 08 January 2019.
<b>Subcontractors</b>	Any Contractor/Supplier (individual or firm) providing services to the Project, hired by the Contractors (not NnGOWL).
<b>Wind Farm</b>	The offshore array as assessed in the Application including wind turbines, their foundations, the interconnector and inter-array cabling.
<b>Wind Farm Area</b>	The area outlined in black in Figure 1 attached to the Section 36 Consent Annex 1, and the area outlined in red in Figure 1 attached to Part 4 of the Wind Farm Marine Licence.

## Consent Plans

CONSENT PLAN	ABBREVIATION	DOCUMENT REFERENCE NUMBER
Decommissioning Programme	DP	NNG-NNG-ECF-PLN-0016
Construction Programme and Construction Method Statement	CoP and CMS	NNG-NNG-ECF-PLN-0002
Piling Strategy	PS	NNG-NNG-ECF-PLN-0011
Development Specification and Layout Plan	DSLDP	NNG-NNG-ECF-PLN-0003
Design Statement	DS	NNG-NNG-ECF-PLN-0004
OfTI Environmental Management Plan	OfTI EMP	NNG-NNG-ECF-PLN-0018
OfTI Operation and Maintenance Programme	OfTI OMP	NNG-NNG-ECF-PLN-0017
OfTI Navigational Safety Plan and Vessel Management Plan	OfTI NSVMP	NNG-NNG-ECF-PLN-0021
Construction Phase Emergency Response Cooperation Plan	Construction Phase ERCoP	NNG-NNG-ECF-PLN-0015
Operations Phase Emergency Response Cooperation Plan	Operations Phase ERCoP	NNG-NNG-ECF-PLN-0022
OfTI Cable Plan	OfTI CaP	NNG-NNG-ECF-PLN-0019
OfTI Lighting and Marking Plan	OfTI LMP	NNG-NNG-ECF-PLN-0020
Project Environmental Monitoring Programme	PEMP	NNG-NNG-ECF-PLN-0013
Fisheries Management and Mitigation Strategy	FMMS	NNG-NNG-ECF-PLN-0008
Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries	WSI & PAD	NNG-NNG-ECF-PLN-0005
Construction Traffic Management Plan	CTMP	NNG-NNG-ECF-PLN-0014

# 1 Introduction

## 1.1 Background

1. The Project is being developed by Neart na Gaoithe Offshore Wind Limited (NnGOWL), which is owned by EDF Power Solutions UK and Ireland (referred to as EDF throughout the remainder of this document).
2. NnGOWL are responsible in undertaking the operation and maintenance, and any residual construction activities, of the OfTI assets up to the point of transfer of the assets to an Offshore Transmission Owner (OfTO), thereafter the OfTO will be responsible for the above for the offshore transmission infrastructure (OfTI).
3. The OfTI consent is the Transmission Works Marine Licence, originally MS-00008954 on the 12 October 2020 and most recently on the 26 May 2022 by issue of MS-00009831.
4. A separate EMP has been prepared for the Wind Farm assets, namely the inter-array cables, wind turbines, wind turbine jacket foundations and interconnector cable.

## 1.2 Objectives of the Plan

5. The Marine Licence contains a variety of conditions that must be discharged through approval by the Scottish Ministers prior to the commencement of any offshore construction works. One such requirement is the approval of an Environmental Management Plan (OfTI EMP), the purpose of which is to provide the over-arching framework for on-site environmental management during construction and operation of the Development (but excluding decommissioning). The relevant conditions setting out the requirement for an OfTI EMP for approval, and which are to be discharged by this OfTI EMP, are presented in full in Table 1-1.
6. In line with the requirements of the Marine Licence, this document presents the environmental management procedures that will be implemented during Construction and Operation and Maintenance (O&M) activities associated with the OfTI.
7. In addition to the specific consent requirements for an OfTI EMP and the requirements thereof (as set out in Table 1-1), this OfTI EMP also includes information in respect of a number of other consents conditions which are linked to the matter of environmental management; these are set out in Table 1-2.

Table 1-1 : Consent conditions to be discharged by this OfTI EMP

OFFSHORE CONSENTS REFERENCE	CONDITION	WHERE ADDRESSED
<b>OfTW Marine Licence Condition 3.2.2.11</b>	<p>The Licensee must, no later than six months prior to the Commencement of the Works, submit an OfTI EMP, in writing, to the Licensing Authority for its written approval.</p>	<p>This document sets out the OfTI EMP for approval by Scottish Ministers</p>
	<p>Such approval may only be granted following consultation by the Licensing Authority with SNH, SEPA, RSPB Scotland, WDC, RTC, Tay DSFB, Esk DSFB, Forth DSFB, FMS and any such other advisors or organisations as may be required at the discretion of the Licensing Authority. Commencement of the Works may not take place until such approval is granted.</p>	<p>Consultation to be undertake by the Scottish Ministers</p>
	<p>The OfTI EMP must provide the over-arching framework for on-site environmental management during the phases of Works as follows:</p> <ul style="list-style-type: none"> <li>a. All construction as required to be undertaken before the Completion of the Works; and</li> <li>b. The operational lifespan of the Works from the Completion of the Works until the cessation of electricity generation.</li> </ul>	<p>This OfTI EMP, for approval by the Scottish Ministers, addresses the construction and operation phase. If required, the OfTI EMP will be updated to take account of O&amp;M environmental management procedures.</p>
	<p>The OfTI EMP must be in accordance with the Application insofar as it relates to environmental management measures. The OfTI EMP must set out the roles, responsibilities and chain of command for the company personnel, any contractors or sub-contractors in respect of environmental management for the protection of environmental interests during the construction and operation of the Works. It must address, but not be limited to, the following over-arching requirements for environmental management during construction:</p>	<p>Section 4.3 (Roles, Responsibilities and Chain of Command)</p>
	<ul style="list-style-type: none"> <li>a. Mitigation measures to prevent significant adverse impacts to environmental interests, as identified in the Application and pre-consent and pre-construction monitoring or data collection, and include the relevant parts of the CMS (refer to condition 3.2.2.8);</li> </ul>	<p>Mitigation measures detailed in the Application are set out in Section 5. The linkage to the CMS is set out in Section 1.3</p>
	<ul style="list-style-type: none"> <li>b. A pollution prevention and control method statement, including contingency plans;</li> </ul>	<p>Section 5.7 Pollution Prevention and Contingency Planning</p>
	<ul style="list-style-type: none"> <li>c. Management measures to prevent the introduction of invasive non-native marine species;</li> </ul>	<p>Section 5.4 Invasive Non-Native Marine Species</p>
	<ul style="list-style-type: none"> <li>d. A site waste management plan (dealing with all aspects of waste produced during the construction period), including details of contingency planning in the event of accidental release of materials which could cause harm to</li> </ul>	<p>Section 5.8 Waste Management</p>

OFFSHORE CONSENTS REFERENCE	CONDITION	WHERE ADDRESSED
	the environment. Wherever possible the waste hierarchy of reduce, reuse and recycle should be encouraged; and	
	e. The reporting mechanisms that will be used to provide the Licensing Authority and relevant stakeholders with regular updates on construction activity, including any environmental issues that have been encountered and how these have been addressed.	Section 4.6 OfTI EMP Communications and Reporting
	The OfTI EMP must be regularly reviewed by the Licensee and the Licensing Authority or FTRAG, at intervals agreed by the Licensing Authority. Reviews must include, but not be limited to, the reviews of updated information on construction methods and operations of the Works and updated working practices.	Section 2.2 Statements of Compliance
	The OfTI EMP must be informed, so far as is reasonably practicable, by the baseline monitoring or data collection undertaken as part of the Application and the PEMP.	Section 5.1 EIA Report Compliance Register

Table 1-2 : Other consent conditions relevant to this Consent Plan

OFFSHORE CONSENTS REFERENCE	CONDITION	WHERE ADDRESSED
OfTW Marine Licence Condition 3.1.4	<p>Should the Licensee or any of its agents, contractors or sub-contractors, by any reason of force majeure deposit anywhere in the marine environment any substance or object, then the Licensee must notify the Licensing Authority of the full details of the circumstances of the deposit within 48 hours of the incident occurring (failing which as soon as reasonably practicable after that period of 48 hours has elapsed).</p> <p><i>Force majeure</i> may be deemed to apply when, due to stress of weather or any other cause, the master of a vessel or vehicle operator determines that it is necessary to deposit the substance or object other than at the Site because the safety of human life or, as the case may be, the vessel, vehicle or marine structure is threatened. Under Annex II, Article 7 of the OSPAR Convention, the Licensing Authority is obliged to immediately report force majeure incidents to the OSPAR Commission.</p>	Section 5.5 Seabed Deposits and Notification of Dropped Objects
OfTW Marine Licence Condition 3.1.8	<p>The Licensee must seek prior written approval from the Licensing Authority for any chemicals in an open system which are to be utilised in the construction, operation and maintenance of the Works. Requests for approval must be submitted in writing to the Licensing Authority no later than one month prior to its intended use or such other period as agreed by the Licensing Authority. The Licensee must ensure that no chemicals are used in an open system without the prior written approval of the Licensing Authority.</p> <p>If the proposed chemical is on the Offshore Chemical Notification Scheme (OCNS) list, the approval request must include the chemical name, volume or quantity to be used, the OCNS list grouping or rank and the proposed frequency of use.</p> <p>If the proposed chemical is not on the OCNS list, the approval request must include details of chemical to be used, including safety data sheet, depth and current at the Site, quantities or volumes and the proposed frequency of use.</p>	Section 5.3 Chemical Usage
	<p>The Licensee must notify the Licensing Authority of the types of chemicals to be used in a closed containment system prior to use.</p>	Section 5.3 Chemical Usage
	<p>The Licensee should take all practicable steps to avoid leakages from a closed containment system into the Scottish marine area. Any such leakages must be reported to the Licensing Authority as soon as practicable.</p>	Section 5.3 Chemical Usage
OfTW Marine Licence Condition 3.1.9	<p>The Licensee must ensure that all equipment to be utilised in the Works which contains fluorinated greenhouse gases (hydrofluorocarbons, perfluorocarbons, sulphur hexafluoride and other greenhouse gases that contain fluorine, listed in Annex I of Regulation No 517/2014 of the European Parliament and of the Council of 16 April 2014 on Fluorinated Greenhouse Gases (“F-Gas Regulation”) or mixtures containing any of those substances) must take precautions to prevent the unintentional release (‘leakage’) of those gases. The Licensee must take all measures which are technically and economically feasible to minimise leakage of fluorinated greenhouse gases.</p> <p>Where leakage of fluorinated greenhouse gases is detected, the Licensee must ensure that the equipment is repaired without undue delay.</p>	Section 5.3 Chemical Usage
OfTW Marine Licence	<p>All reasonable, appropriate and practicable steps are taken at all times to avoid or minimise any damage to the Scottish marine area.</p>	Section 4 and Section 5

OFFSHORE CONSENTS REFERENCE	CONDITION	WHERE ADDRESSED
<b>Condition 3.1.10 (Partial)</b>	Ensure that all personnel adhere to the SMWWC where appropriate during all construction, operation and maintenance activities authorised under this licence.	
	Any debris or waste material placed below MHWS level during the construction of the Works is removed from the Site, unless agreed otherwise by the Licensing Authority, as soon as is reasonably practicable, for disposal at a location above the MHWS level, approved by SEPA	Section 5.8 Waste Management
	All substances and objects deposited during the Works are inert (or appropriately coated or protected so as to be rendered inert) and do not contain toxic elements	Section 5.7 Pollution Prevention and Contingency Planning
	The risk of transferring marine non-native species to and from the Site is kept to a minimum by ensuring appropriate bio-fouling management practices are implemented	Section 5.4 Invasive Non-Native Marine Species
<b>OfTW Marine Licence Condition 3.2.1.1</b>	In the event of any breach of health and safety or environmental obligations relating to the Works during the period of this Licence, the Licensee must provide written notification of the nature and timing of the incident to the Licensing Authority within 24 hours of the incident occurring. Confirmation of remedial measures taken and/or to be taken to rectify the breach must be provided, in writing, to the Licensing Authority within a period of time to be agreed by the Licensing Authority.	Section 4.6.4 Incident Reporting
<b>OfTW Marine Licence Condition 3.2.1.2</b>	The Licensee must ensure suitable bunding and storage facilities are employed to prevent the release into the marine environment of fuel oils and lubricating fluids associated with the Works and associated equipment.	Section 5.3 Chemical Usage
<b>OfTW Marine Licence Condition 3.2.2.15</b>	The responsibilities of the Environmental Clerk of Works (ECoW) must include: <ul style="list-style-type: none"> <li>a. Quality assurance of final draft versions of all plans and programmes required under this licence;</li> <li>b. Responsibility for the monitoring and compliance of the licence conditions and the environmental mitigation measures for the Works authorised by this licence;</li> <li>c. Provision of on-going advice and guidance to the Licensee in relation to achieving compliance with licence conditions, including but not limited to the conditions relating to and the implementation of the Construction Method Statement (CMS), the OfTI EMP, the Project Environmental Monitoring Programme (PEMP), the Piling Strategy (PS), the Cable Plan (CaP) and the Vessel Management Plan (VMP);</li> <li>d. Provision of reports on point b) &amp; c) above to the Licensing Authority at timescales to be determined by the Licensing Authority;</li> <li>e. Induction and toolbox talks to onsite construction teams on environmental policy and procedures, including temporary stops and keeping a record of these;</li> </ul>	Section 4.3 OfTI EMP Roles, Responsibilities and Chain of Command

OFFSHORE CONSENTS REFERENCE	CONDITION	WHERE ADDRESSED
	<ul style="list-style-type: none"> <li>f. Monitoring that the Works are being constructed in accordance with the plans and this licence, the Application and in compliance with all relevant regulations and legislation;</li> <li>g. Reviewing and reporting incidents/near misses and reporting any changes in procedures as a result; and</li> <li>h. Agreement of a communication strategy with the Licensing Authority.</li> </ul>	
<b>OftW Marine Licence Condition 3.2.3.1</b>	<p>The Licensee must submit to the Licensing Authority a detailed Transportation Audit Report (TAR) for each calendar month during the construction phase of the Works. The TAR must be submitted within 14 days of the end of each calendar month.</p> <p>The TAR must include the nature and quantity of all substances and objects deposited and materials used in construction (as described in Part 2 of this licence) in that calendar month. Alterations and updates can be made in the following month's TAR. Where appropriate, nil returns must be provided.</p>	Section 5.5 Seabed Deposits and Notification of Dropped Objects
	<p>If the Licensee becomes aware of any substances, objects or materials on the TAR that are missing, or becomes aware that an accidental deposit has occurred, the Licensee must notify the Licensing Authority as soon as practicable. The Licensee must undertake such survey as directed by the Licensing Authority to locate the substances, objects and materials. If the Licensing Authority is of the view that any accidental deposits have occurred and should be removed, then the materials must be removed by the Licensee as soon as is practicable and at the Licensee's expense.</p>	Section 5.5 Seabed Deposits and Notification of Dropped Objects

### 1.3 Linkages with other Consent Plans

8. This OftI EMP document sets out the overarching environmental management framework to be applied during the construction and O&M of the OftI. However, ultimately it forms part of a suite of approved documents that provide the framework for environmental management of the Project – namely the other Consent Plans required under the consents.
9. The Consent Plans shown in Table 1-3 below will be submitted for approval by the Scottish Ministers and consistency between these will be achieved by ensuring that all relevant documents are consistent with the terms of any previously submitted or approved Consent Plans.

Table 1-3: OftI EMP consistency with and links to other Consent Plans

OTHER CONSENT PLAN	LINKAGE WITH OFTI EMP
<b>Construction Method Statement and Construction Programme (CMS &amp; CoP)</b>	Details the Project construction methods, setting out good practice construction measures and how mitigation measures proposed in the Environmental Impact Assessment (EIA) Report and Addendum of Additional Information (the Addendum) (as captured within this OftI EMP) are being implemented during construction.
<b>Piling Strategy (PS)</b>	Contains detail on how the piling methods and programme have been developed to reduce effects on noise sensitive species.

OTHER CONSENT PLAN	LINKAGE WITH OFTI EMP
<b>OfTI Navigational Safety and Vessel Management Plan (NSVMP)</b>	Considers the management and coordination of vessels to mitigate the impact of vessels.
<b>OfTI Cable Plan (CaP)</b>	Contains details on environmental sensitivities and design considerations to mitigate, as far as possible, the effects of cable laying and protection installation and operation of the Project.
<b>OfTI Operation and Maintenance Programme (OMP)</b>	Sets out the procedures and good working practices for the O&M phase of the Project, considering environmental sensitivities.
<b>Project Environmental Monitoring Programme (PEMP)</b>	Sets out the monitoring strategy for pre-construction, during construction and post-construction monitoring. Where appropriate, this PEMP will be updated to reflect Project environmental monitoring results.

#### 1.4 OfTI EMP Document Structure

10. An overview of the structure of this OfTI EMP is provided below.

Table 1-4 : OfTI EMP document structure

SECTION	TITLE	SUMMARY OF CONTENT
1	Introduction	Background to consent requirements and overview of the OfTI EMP scope and structure; and  Identifies those other Consent Plans relevant to the environmental management process and the linkage between those plans and the OfTI EMP.
2	Statements of Compliance	Sets out the NnGOWL statements of compliance in relation to the OfTI EMP consent conditions and the broader environmental management process.
3	Project Overview	Provides an overview of the key infrastructure to be installed as part of the Neart na Gaoithe Project.
4	Environmental Management Framework	Describes the environmental management framework for the Project. It provides information on the implementation and communication of the OfTI EMP.
5	Environmental Management and Mitigation Measures	Sets out key mitigation and management measures to mitigate or manage effects on the natural environment including commitments made in the Application,

SECTION	TITLE	SUMMARY OF CONTENT
		mitigation measures to manage the risk to marine animals and habitats, other marine users and to minimise the risk of pollution.
<b>Annex 1</b>	EIA Report and Addendum Compliance Register	Sets out the environmental mitigation measures detailed within the Project Application and relevant to this OfTI EMP.
<b>Annex 2</b>	Construction Marine Pollution Contingency Plan	Sets out emergency response measures that will be implemented in the event of a oil or chemical spill during Construction of the Project.
<b>Annex 3</b>	Operational Phase Marine Pollution Contingency Plan	Sets out emergency response measures that will be implemented in the event of a oil or chemical spill during Operation of the Project.

## 2 NnGOWL Statements of Compliance

### 2.1 Introduction

11. The following section is intended to re-affirm the NnGOWL commitment to ensuring that the Project is designed and constructed in such a manner as to meet the relevant legislative requirements set out by the Offshore Consents.

### 2.2 Statements of Compliance

12. NnGOWL in undertaking the construction of the Project will ensure compliance with this OfTI EMP as approved by the Scottish Ministers (and as updated or amended from time to time as required);
13. NnGOWL in undertaking the construction of the Project will ensure compliance with other, relevant Consent Plans as approved by the Scottish Ministers including, as set out in Section 1.3 above;
14. NnGOWL in undertaking the construction of the Project will ensure compliance with the environmental mitigation and management set out in the EIA Report and the Addendum of Additional Information (Addendum) (see Section 5.1 and Annex 1 - NnGOWL Application Commitments Register) except in so far as amended by the terms of the Offshore Consents;
15. NnGOWL will ensure that the environmental management measures outlined within this OfTI EMP are updated as required as a result of, for example, changes to the proposed construction methodology, new environmental sensitivities identified by monitoring or resulting from emerging guidance or new legislative requirements;
16. NnGOWL will ensure compliance with overarching NnGOWL company Health Safety and Environmental (HSE) systems and standards, the relevant HSE legislation and such other relevant legislation and guidance designed to ensure the safety of construction personnel and other third parties (see Section 4.1 and 4.2 of this OfTI EMP);
17. NnGOWL will make compliance with the approved OfTI EMP (and all other relevant, approved Consent Plans) a requirement for the Contractors through conditions of contract and will monitor compliance through appropriate processes (see also Section 4.7 of this OfTI EMP); and
18. NnGOWL will, in undertaking the construction of the Project, ensure compliance with all relevant legislation and that all necessary licences and permissions are obtained by the Contractors, through conditions of contract and by an appropriate auditing process.

### 3 Project Overview

19. The Wind Farm Area is located to the northeast of the Firth of Forth, 15.5 km directly east of Fife Ness on the east coast of Scotland (see Figure 3-1). The Wind Farm Area covers approximately 105 km<sup>2</sup>. Offshore Export Cables will be located within the 300 m wide Offshore Export Cable Corridor, running in an approximately southwest direction from the Wind Farm Area, making landfall at Thorntonloch beach to the south of Torness Power Station in East Lothian. Figure 3-1 shows the Wind Farm Area and Offshore Export Cable Corridor.
20. The OfTI, namely the two Offshore Substations Platforms (OSPs) and export cables, will be divested to the Offshore Transmission Operator (OfTO). NnGOWL will remain responsible for the O&M of the OfTI until such time as the transfer to the OfTO. Upon transfer of ownership, the OfTO will be responsible for updating and implementing the relevant elements of this OfTI EMP.
21. The Generating Station is comprised of:
  - 54 wind turbines generating a maximum generating output of around 450 Megawatts (MW);
  - 54 jacket substructures installed on pre-piled foundations, to support the wind turbines;
  - A network of inter-array subsea cables, buried and/or mechanically protected, to connect strings of turbines together and to connect the turbines to the OSPs;
  - One interconnector cable connecting the OSPs to each other;
22. The components that make up the OfTI, and covered by this EMP, consist of the following:
  - Two alternating current (AC) substation platforms, referred to as Offshore Substation Platforms (OSPs), to collect the generated electricity for transmission to shore;
  - Two jacket substructures installed on piled foundations, to support the OSPs; and
23. Two buried and mechanically protected subsea export cables to transmit the electricity from the OSPs to the landfall at Thorntonloch and connecting to the onshore buried export cables for transmission to the onshore substation and connection to the National Grid network. Offshore construction commenced in August 2020 and is scheduled to take approximately six years to complete. Details of the construction programme are provided in the Construction Programme (CoP).

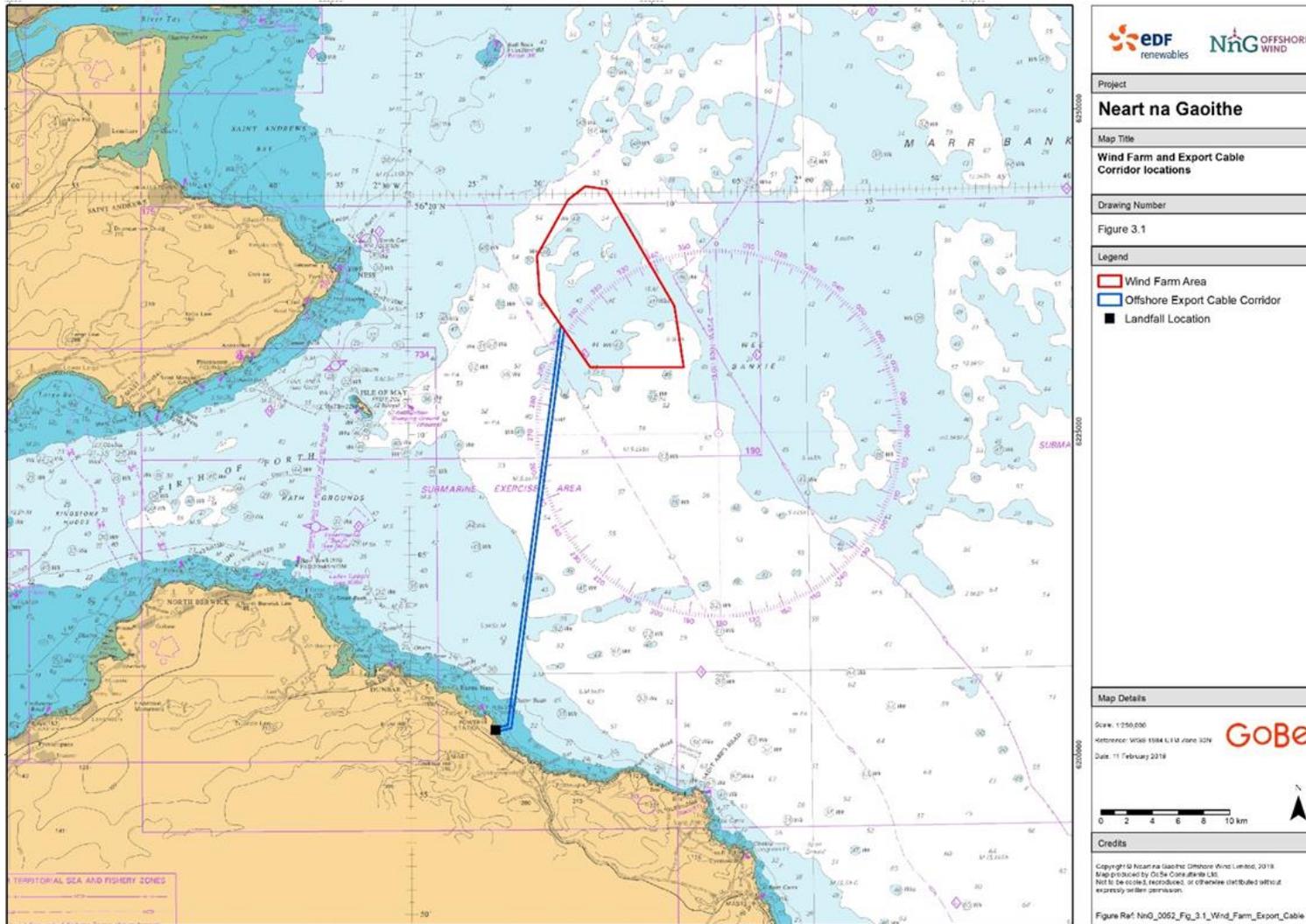


Figure 3-1: Wind Farm Area and Offshore Export Cable Corridor locations

## 4 Environmental Management Framework

24. This section sets out the over-arching environmental management framework for the construction and O&M of the OfTI. Specific environmental management requirements and procedures are then set out in 5 of this OfTI EMP.

### 4.1 NnGOWL Health, Safety and Environment Policy and Objectives

25. NnGOWL’s vision is to be an industry leader in HSE performance, with Zero Harm as a core objective.

26. NnGOWL has developed an overarching Health, Safety and Environment Plan, with the following objectives:

- To ensure compliance with all applicable HSE legal requirements, regulations and Industry Standards;
- To monitor and audit the HSE performance of NnGOWL, its employees and Contractors;
- To engage in communication on HSE performance with stakeholders and the public;
- To allocate appropriate resources to ensure that the principals of the HSE Plan are implemented;
- To supply appropriate information, instruction, training and supervision to all employees and contractors such as is required to actively promote HSE awareness and compliance.

27. To achieve these objectives NnGOWL will work collaboratively to create a safety charter between NnGOWL and each main contractor. This charter will draw on lessons learnt from previous projects with the goal of improving safety performance. The charter will be driven by the Project Director and the HSE personnel, with the support of the Construction Manager, the HSE Team and the package managers (See Section 4.3).

28. The HSE Plan is underpinned by a number of Project-specific HSE Management Standards, covering the topics listed in Table 4-1.

Table 4-1: HSE Management Standards that will be implemented during Construction and Operation of the Project

HSE PLAN MANAGEMENT STANDARDS	
HSE Governance	HSE Marine Activities
HSE Management System	HSE People Competencies and Training
HSE Meeting Structure	HSE Within the Procurement Process
HSE Leadership and Commitment	HSE Observation and Incident Standard
HSE Risk Management	Emergency Response
HSE Method Statements	Design Risk Assessment Approval Process
Permit to Work	

## 4.2 Environmental Policy and Objectives

29. In line with over-arching company policy NnGOWL is committed to minimising environmental impact. This means staying within permitted limits for operations, using best available techniques to reduce environmental risk, and prioritising efforts to make the most difference in reducing the company's contribution to climate change, and to protect a cleaner, healthier and more resilient environment that benefits society and the economy.

30. NnGOWL's goal is to demonstrate real progress towards reducing carbon emissions, waste, water use and impact on biodiversity. The company will also implement circular economy principles into the way it works, reducing waste and avoiding pollution and achieving greater resource value and productivity.

## 4.3 OfTI EMP Roles, Responsibilities and Chain of Command - Construction Phase

31. This section sets out the roles and responsibilities of all relevant Project personnel during the construction phase, in relation to the delivery of this OfTI EMP.

32. The consents require the appointment of certain specialist environmental roles to oversee the construction of the Development, including an ECoW, Company Fisheries Liaison Officer (CFLO) and Archaeological Consultant.

33. All Project personnel have a responsibility to comply with the requirements of the OfTI EMP, however the key roles relevant to the delivery and implementation of the OfTI EMP are:

- NnGOWL Project Director;
- NnGOWL HSE Manager;
- NnGOWL Construction Manager;
- NnGOWL Package Managers;
- NnGOWL Development Manager;
- NnGOWL Offshore Consents Manager;
- NnGOWL's ECoW;
- NnGOWL's CFLO;
- NnGOWL's Archaeological Consultant; and,
- Contractor(s).

34. These roles are further described in the sections below. Figure 4-1 shows the linkages between the different roles and teams with respect to delivery of the OfTI EMP, and visually depicts the chain of command.

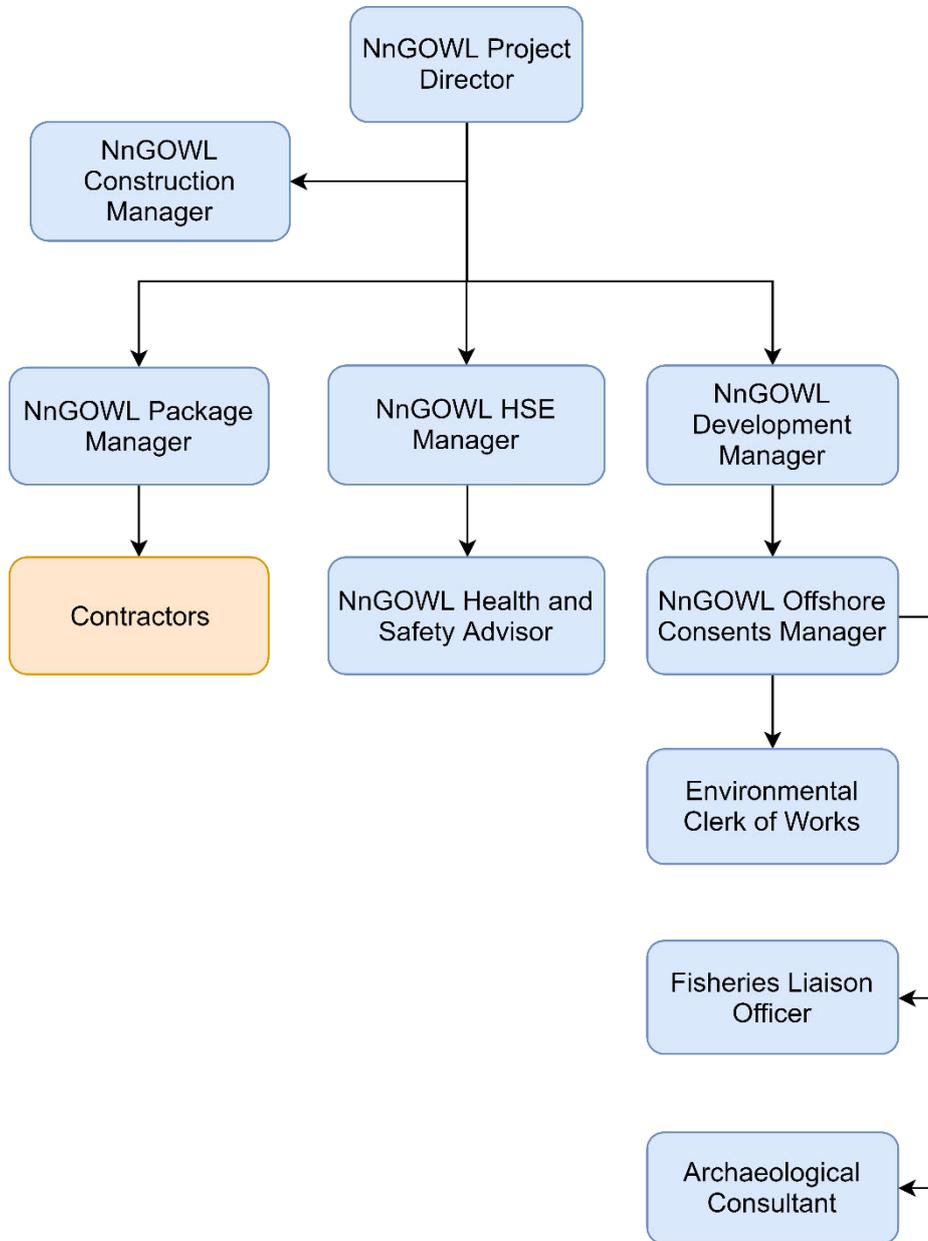


Figure 4-1: NnGOWL Organogram and lines of communication relevant to this OfTI EMP

Table 4-2: Key responsibilities of the Project Director relevant to this OfTI EMP

PROJECT DIRECTOR	
<b>Reports to</b>	EDF Power Solutions Senior Management and the NnGOWL Board
<b>Responsibilities</b>	<ul style="list-style-type: none"> <li>Ensure that sufficient resources and processes are in place to deliver/comply with the OfTI EMP and to manage potential environmental impacts;</li> <li>Ensure that provision is made for environmental management issues to form part of construction and operation progress meetings and Project inductions;</li> <li>Ensure contractual obligations are established for Contractors in relation to this OfTI EMP.</li> </ul>

Table 4-3: Key responsibilities of the HSE Manager relevant to this OfTI EMP

NNGOWL HSE MANAGER	
<b>Reports to</b>	NnGOWL Project Director
<b>Responsibilities</b>	<p>The NnGOWL HSE Manager is responsible for providing support, advice and guidance on all aspects of Health, Safety &amp; Environmental management on the Project. Key responsibilities relevant to the OfTI EMP include the following:</p> <ul style="list-style-type: none"> <li>Coordinating the development, monitoring and implementation of NnGOWL HSE management plans, which will be implemented alongside the OfTI EMP;</li> <li>Providing HSE support, advice and guidance to the NnGOWL Project team; and</li> <li>Coaching of the Project team to facilitate improvements in HSE performance.</li> </ul>

Table 4-4: Key responsibilities of the Health and Safety Advisor relevant to this OfTI EMP

NNGOWL HEALTH AND SAFETY ADVISOR	
<b>Reports to</b>	NnGOWL HSE Manager
<b>Responsibilities</b>	<p>The NnGOWL Health and Safety Advisor will support the HSE Manager in implementing the HSE Management Plans throughout construction of the Project. Key responsibilities relevant to the OfTI EMP include the following:</p> <ul style="list-style-type: none"> <li>Ensure personnel engaged on the Project are aware of all HSE obligations detailed within the NnGOWL HSE Management Plans;</li> <li>Monitor HSE performance levels; and</li> <li>HSE auditing and reporting.</li> </ul>

Table 4-5: Key responsibilities of the Construction Manager relevant to this OfTI EMP

NNGOWL CONSTRUCTION MANAGER	
<b>Reports to</b>	NnGOWL Project Director
<b>Responsibilities</b>	<p>The NnGOWL Construction Manager will oversee the management of construction activities of the whole Project ensuring that the package managers have the necessary resources to implement environmental management measures detailed within this OfTI EMP. Key responsibilities include:</p> <ul style="list-style-type: none"> <li>• Ensure that environmental management measures are implemented and monitored across the Project during construction and operation;</li> <li>• Ensure that all personnel and Contractors assist and support the ECoW / Offshore Consents Manager where required, for example during on-site audits;</li> <li>• Ensure that any corrective actions arising from environmental audits are addressed; and</li> <li>• Ensure Contractor and Subcontractor non-compliance is reported and addressed.</li> </ul>

Table 4-6: Key responsibilities of the Package Managers relevant to this OfTI EMP

NNGOWL PACKAGE MANAGERS	
<b>Reports to</b>	NnGOWL Project Director
<b>Responsibilities</b>	<p>The Package Managers lead and manage the delivery of construction and O&amp;M work packages which includes: Marine Installation; Transmission System; and Turbine Supply/Installation/Maintenance. The Package Managers have similar responsibilities to the Senior Project Manager, but in relation to their specific packages of work.</p> <p>The Package Managers have the following responsibilities in relation to the OfTI EMP:</p> <ul style="list-style-type: none"> <li>• Establishing and administering contractual obligations for Contractors in relation to OfTI EMP;</li> <li>• Responsible for ensuring that sufficient resources and processes are in place across their work package to deliver/comply with the OfTI EMP and to manage potential environmental risks;</li> <li>• Ensuring that provision is made for environmental management issues to form part of work package progress meetings;</li> <li>• Ensure provision is made for work package personnel to receive training from NnGOWL's ECoW specific to their role and responsibilities;</li> <li>• Ensuring that all work package personnel and Contractors personnel assist and support NnGOWL's ECoW where required, for example ECoW reporting and during walkdowns;</li> <li>• Responsible for administering the contractual requirements in relation to incidence of Contractor non-compliance; and</li> <li>• Where applicable to the work package, ensuring that any corrective actions arising from environmental incidents and/or non-compliances are implemented.</li> </ul>

Table 4-7: Key responsibilities of the Contractors relevant to this OfTI EMP

CONTRACTORS	
<b>Reports to</b>	NnGOWL Package Managers
<b>Responsibilities</b>	<p>All Contractors shall ensure that their own procedures encompass and fully discharge the mitigation and management measures and commitments presented in this OfTI EMP. This OfTI EMP forms the framework and the minimum standards for all construction personnel, Contractors to comply with.</p> <p>Adherence to the NnGOWL OfTI EMP will be a contractual requirement and Contractors will be required to develop their own task-specific method statements and OfTI EMPs in accordance with the NnGOWL OfTI EMP, the implementation of which will be monitored by NnGOWL.</p> <p>The Contractors have the following responsibilities in relation to this OfTI EMP:</p> <ul style="list-style-type: none"> <li>• Ensure that sufficient resources and processes are in place to deliver/comply with this OfTI EMP and manage potential environmental impacts;</li> <li>• Responsible for reporting to the NnGOWL management team via the relevant Package Manager;</li> <li>• Responsible for implementing and discharging the required mitigation (control) measures on behalf of NnGOWL;</li> <li>• Developing a contractor-specific OfTI EMP, using this overarching OfTI EMP and associated Annexes as guidance, for NnGOWL review and comment;</li> <li>• Comply with the requirements of the NnGOWL overarching OfTI EMP as a minimum standard and look to include additional mitigation measures where appropriate;</li> <li>• Ensure that the NnGOWL OfTI EMP is implemented by reviewing task specific Method Statements and Risk Assessments to ensure consistency and compliance with the overarching OfTI EMP;</li> <li>• Ensuring that Subcontractors adhere to the requirements of the overarching NnGOWL OfTI EMP, and the Contractor OfTI EMP and Method Statements;</li> <li>• Producing and maintaining records of activity on site and communicating those to the ECoW to enable reporting of compliance to MD-LOT; and</li> <li>• Liaising with the NnGOWL ECoW.</li> </ul>

Table 4-8: Key responsibilities of the Development Manager relevant to this OfTI EMP

NNGOWL DEVELOPMENT MANAGER	
<b>Reports to</b>	NnGOWL Project Director
<b>Responsibilities</b>	<p>Ensuring ongoing compliance of the project is ultimately the responsibility of the NnGOWL Development Manager supported by the Offshore Consents Manager and the ECoW. Key responsibilities in relation to this OfTI EMP include:</p> <ul style="list-style-type: none"> <li>• Ensure that the NnGOWL Offshore Consents Manager has sufficient resources and processes in place to implement and audit the environmental management processes required by this OfTI EMP; and,</li> <li>• Ensure that environmental management measures are implemented and monitored across the Project during construction and operation.</li> </ul>

Table 4-9: Key responsibilities of the Offshore Consents Manager relevant to this OfTI EMP

NNGOWL OFFSHORE CONSENTS MANAGER	
<b>Reports to</b>	NnGOWL Development Manager
<b>Responsibilities</b>	<p>Ensuring ongoing compliance with the OfTI EMP is ultimately the responsibility of the NnGOWL Offshore Consents Manager, supported by the ECoW.</p> <p>The NnGOWL Offshore Consents Manager will be responsible for all other reporting, returns and notifications to MD-LOT and relevant stakeholders as required by the Project consents. Key responsibilities in relation to this OfTI EMP include:</p> <ul style="list-style-type: none"> <li>• Ensure compliance with the OfTI EMP, supported by the ECoW and Environmental Manager;</li> <li>• Primary contact for MD-LOT, FTRAG, statutory bodies and stakeholders (excluding the responsibilities undertaken by NnGOWL's ECoW);</li> <li>• Managing NnGOWL's ECoW reporting on compliance with consent conditions to MD-LOT;</li> <li>• Where necessary, managing the process of obtaining new consents (if a result of NnGOWL originated activities) or monitoring consent applications made by Contractors / Principal Contractor(s) originated activities);</li> <li>• Attendance at NnGOWL meetings, providing environmental management input;</li> <li>• Reviewing Contractor documentation (e.g. method statements and risk assessments, OfTI EMPs) to ensure compliance with the NnGOWL OfTI EMP and associated Annexes;</li> <li>• Managing NnGOWL's Company FLO and Archaeological Consultant; and</li> <li>• Reporting to MD-LOT and FTRAG in respect to the PEMP.</li> </ul>

Table 4-10: Key responsibilities of the Environmental Clerk of Works relevant to this OfTI EMP

ENVIRONMENTAL CLERK OF WORKS	
<b>Reports to</b>	NnGOWL Offshore Consents Manager
<b>Responsibilities</b>	<p>General responsibilities for the ECoW include, but are not limited to, the following:</p> <ul style="list-style-type: none"> <li>• Responsible for monitoring compliance of the Project with the consents and Consent Plans;</li> <li>• Responsible for reporting on compliance and environmental issues to NnGOWL and to MD-LOT (within the remit of the ECoW consents conditions);</li> <li>• Support NnGOWL's Environmental Manager with monitoring compliance with environmental management related elements of this OfTI EMP and with the Marine Pollution Contingency Plan (MPCP), where required;</li> <li>• Review and quality check of this OfTI EMP (and all Consents Plans and Programmes);</li> <li>• Review of relevant Contractor documents from a compliance perspective;</li> <li>• Provision of advice to NnGOWL on compliance with consents conditions;</li> <li>• Attendance at NnGOWL meetings, providing environmental input; and</li> <li>• Direct liaison with MD-LOT, FTRAG, statutory bodies and stakeholders as required.</li> </ul> <p>Construction-specific responsibilities include, but are not limited to:</p> <ul style="list-style-type: none"> <li>• Monitoring of compliance with this OfTI EMP and other relevant Consent Plans by liaising regularly with the Construction Manager and HSE Manager, as well as other members of the</li> </ul>

	<p>project team with roles relevant to the OfTI EMP and by attending and participating in site / works meetings, drills and audits;</p> <ul style="list-style-type: none"> <li>• Providing support in the induction of NnGOWL and contractor personnel on site / works environmental policy and procedures;</li> <li>• Suggesting modifications to activities that would lead to non-compliance – provided that there are no overriding health and safety reasons for continuing with the activity; and</li> <li>• Being primary contact in NnGOWL consents team in any environmental incident response.</li> </ul>
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Table 4-11: Key responsibilities of the Company Fisheries Liaison Officer relevant to this OfTI EMP

NNGOWL COMPANY FISHERIES LIAISON OFFICER (FLO)	
<b>Reports to</b>	NnGOWL Offshore Consents Manager
<b>Responsibilities</b>	<p>Responsible for establishing and maintaining effective communications between NnGOWL, Contractors, fishermen and other users of the sea during the construction phase. The Company FLO will provide information relating to the safe operation of fishing in the vicinity of the Project during construction.</p> <p>The responsibilities of the NnGOWL Company FLO in relation to the OfTI EMP are as follows:</p> <ul style="list-style-type: none"> <li>• Establish and maintain effective communications between NnGOWL, Contractors, fishermen and other users of the sea;</li> <li>• Provide information relating to the safe operation of fishing activity within and in the vicinity of the Site;</li> <li>• Participate in the Forth and Tay Commercial Fisheries Working Group (FTCFWG), to facilitate commercial fisheries dialogue;</li> <li>• Monitor Project compliance with best practice guidelines and the Fisheries Management and Mitigation Strategy (FMMS);</li> <li>• Liaise with NnGOWL’s ECoW regarding compliance with the FMMS; and</li> <li>• Develop and deliver training on compliance with the FMMS to NnGOWL personnel including input to inductions, presentations and production of awareness material.</li> </ul>

Table 4-12: Key responsibilities of the Archaeological Consultant relevant to this OfTI EMP

NNGOWL ARCHAEOLOGICAL CONSULTANT	
<b>Reports to</b>	NnGOWL Offshore Consents Manager
<b>Responsibilities</b>	<p>The Archaeological Consultant will be responsible for advising NnGOWL on all archaeological matters relating to the Project that might impact upon archaeological and cultural heritage resources.</p> <p>The Archaeological Consultant has the following responsibilities:</p> <ul style="list-style-type: none"> <li>Assume clear role of interface between NnGOWL and Historic Environment Scotland in the event of a potential find or an infringement of an Archaeological Exclusion Zone (AEZ), as detailed in the Offshore Written Scheme of Investigation and Protocol for Archaeological Discoveries (WSI &amp; PAD);</li> <li>Liaise with NnGOWL’s ECoW in the event of a potential find or an infringement of an AEZ;</li> <li>Liaise with NnGOWL’s ECoW regarding compliance with the WSI &amp; PAD; and</li> <li>Develop and deliver training on relevant aspects of the WSI &amp; PAD to NnGOWL personnel including input to inductions, presentations, production of awareness material etc.</li> </ul>

#### 4.4 OfTI EMP Roles, Responsibilities and Chain of Command - O&M Phase Prior to OfTO

35. NnGOWL are responsible in undertaking the operation and maintenance of the OfTI assets up to the point of transfer of the assets to an Offshore Transmission Operator (OfTO), thereafter the OfTO will be responsible for the above offshore transmission infrastructure (OfTI) in relation to pollution prevention.
36. This section sets out the roles and responsibilities of all relevant personnel during the O&M phase up to the point of OfTO transfer, in relation to the delivery of this OfTI EMP.
37. The Marine Licence require the appointment of certain specialist environmental roles to oversee the Operation and Maintenance of the Development.
38. All Project personnel have a responsibility to comply with the requirements of the OfTI EMP, however the key roles relevant to the delivery and implementation of the OfTI EMP are:
  - NnGOWL O&M Manager;
  - NnGOWL Asset Manager;
  - NnGOWL Production Manager;
  - NnGOWL Offshore HSE Advisor;
  - NnGOWL Offshore Environment Manager;
  - NnGOWL Consents Manager;
  - NnGOWL Control Room Supervisors / Operational Coordinators;
  - NnGOWL’s CFLO; and
  - Contractor(s).
39. These roles are further described in the sections below. Figure 4-2 shows the linkages between the different roles and teams with respect to delivery of the OfTI EMP and visually depicts the chain of command.

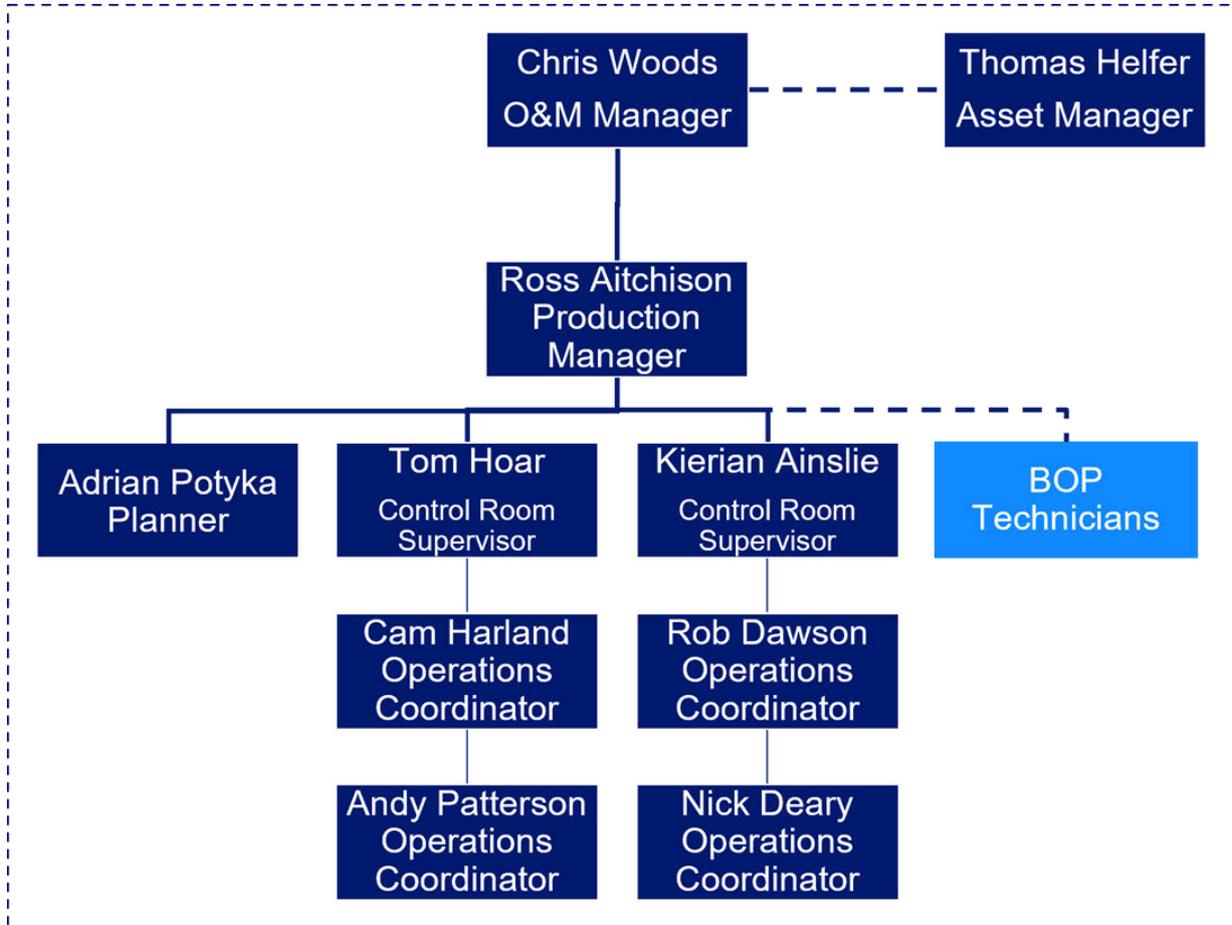


Figure 4-2: NnGOWL Organogram and lines of communication relevant to this OfTI EMP

Table 4-13: Key responsibilities of the O&M Manager relevant to this OfTI EMP

NNGOWL O&M MANAGER	
<b>Reports to</b>	EDF Power Solutions Senior Management and the NnGOWL Board
<b>Responsibilities</b>	<p>The NGOWL O&amp;M Manager is responsible for:</p> <ul style="list-style-type: none"> <li>Ensuring that sufficient resources and processes are in place to deliver/comply with the OfTI EMP and to manage potential environmental impacts;</li> <li>Ensuring that provision is made for environmental management issues to form part of operation progress meetings and Project inductions; and</li> <li>Ensuring contractual obligations are established for Contractors in relation to this OfTI EMP.</li> </ul>

Table 4-14: Key responsibilities of the Asset Manager relevant to this OfTI EMP

NNGOWL ASSET MANAGER	
<b>Reports to</b>	EDF Power Solutions Senior Management and the NnGOWL Board
<b>Responsibilities</b>	The NnGOWL Asset Manager is responsible for reporting on any marine pollution incident to the NnGOWL Board, and for addressing Contractor non-compliance.

Table 4-15: Key responsibilities of the O&M Production Manager relevant to this OfTI EMP

NNGOWL PRODUCTION MANAGER	
<b>Reports to</b>	NnGOWL O&M Manager
<b>Responsibilities</b>	The NnGOWL Production Manager is responsible for overseeing the day-to-day operation of the OfTI and for the management of the Control Room Supervisors and Operations Coordinators on all day-to-day activities.

Table 4-16: Key responsibilities of the Health and Safety Advisor relevant to this OfTI EMP

NNGOWL HSE ADVISOR	
<b>Reports to</b>	NnGOWL O&M Manager
<b>Responsibilities</b>	The NnGOWL HESE advisor is responsible for maintaining and communicating health and safety procedures and ensuring that O&M activity is undertaken in compliance with the health and safety legislation and project plans.

Table 4-17: Key responsibilities of the Offshore Environment Manager relevant to this OfTI EMP

NNGOWL OFFSHORE ENVIRONMENT MANAGER	
<b>Reports to</b>	NnGOWL O&M Manager

<b>Responsibilities</b>	The Offshore Environment Manager is responsible for maintaining and communicating environmental management procedures and ensuring that O&M activity is undertaken in compliance with the Offshore Consents. Reporting to MD-LOT as required. Where necessary supported by a Consents Manager.
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Table 4-18: Key responsibilities of the NnG Control Room Supervisors / Operational Coordinators relevant to this OfTI EMP

NNG CONTROL ROOM SUPERVISORS/ OPERATIONAL COORDINATORS	
<b>Reports to</b>	NnGOWL Production Manager
<b>Responsibilities</b>	NnG Control Room Supervisors/Operational Coordinators are responsible for the ongoing monitoring and control of all NnGOWL assets. Control Room Supervisors/Operational Coordinators will be responsible for the management, coordination and monitoring of all O&M vessels transiting to and from the OfTI to ensure the safety of the OfTI.

Table 4-18: Key responsibilities of the Contractors relevant to this OfTI EMP

CONTRACTORS	
<b>Reports to</b>	NnGOWL Production Manager and O&M Manager
<b>Responsibilities</b>	<p>All Contractors shall ensure that their own procedures encompass and fully discharge the mitigation and management measures and commitments presented in this OfTI EMP. This OfTI EMP forms the framework and the minimum standards for all O&amp;M personnel and Contractors to comply with.</p> <p>Adherence to the NnGOWL OfTI EMP will be a contractual requirement and Contractors will be required to develop their own task-specific method statements and OfTI EMPs in accordance with the NnGOWL OfTI EMP, the implementation of which will be monitored by NnGOWL.</p> <p>The Contractors have the following responsibilities in relation to this OfTI EMP:</p> <ul style="list-style-type: none"> <li>• Ensure that sufficient resources and processes are in place to deliver/comply with this OfTI EMP and manage potential environmental impacts;</li> <li>• Responsible for reporting to the NnGOWL management team via the O&amp;M Manager;</li> <li>• Responsible for implementing and discharging the required mitigation (control) measures on behalf of NnGOWL;</li> <li>• Developing a contractor-specific OfTI EMP, using this overarching OfTI EMP and associated Annexes as guidance, for NnGOWL review and comment;</li> <li>• Comply with the requirements of the NnGOWL overarching OfTI EMP as a minimum standard and look to include additional mitigation measures where appropriate;</li> <li>• Ensure that the NnGOWL OfTI EMP is implemented by reviewing task specific Method Statements and Risk Assessments to ensure consistency and compliance with the overarching OfTI EMP;</li> <li>• Ensuring that Subcontractors adhere to the requirements of the overarching NnGOWL OfTI EMP, and the Contractor OfTI EMP and Method Statements;</li> <li>• Producing and maintaining records of activity on site and communicating those to the Offshore Environment Manager to enable reporting of compliance to MD-LOT; and</li> <li>• Liaising with the NnGOWL Offshore Environment Manager.</li> </ul>

Table 4-19: Key responsibilities of the Company Fisheries Liaison Officer relevant to this OfTI EMP

NNGOWL COMPANY FISHERIES LIAISON OFFICER (FLO)	
<b>Reports to</b>	NnGOWL Offshore Environment Manager
<b>Responsibilities</b>	<p>Responsible for establishing and maintaining effective communications between NnGOWL, Contractors, fishermen and other users of the sea during the O&amp;M phase. The Company FLO will provide information relating to the safe operation of fishing in the vicinity of the Project during the operational phase.</p> <p>The responsibilities of the NnGOWL Company FLO in relation to the OfTI EMP are as follows:</p> <ul style="list-style-type: none"> <li>• Establish and maintain effective communications between NnGOWL, Contractors, fishermen and other users of the sea;</li> <li>• Provide information relating to the safe operation of fishing activity within and in the vicinity of the Site;</li> <li>• Participate in the Forth and Tay Commercial Fisheries Working Group (FTCFWG), to facilitate commercial fisheries dialogue;</li> <li>• Monitor Project compliance with best practice guidelines and the Fisheries Management and Mitigation Strategy (FMMS);</li> <li>• Liaise with NnGOWL's Offshore Environment Manager regarding compliance with the FMMS; and</li> <li>• Develop and deliver training on compliance with the FMMS to NnGOWL personnel including input to inductions, presentations and production of awareness material.</li> </ul>

#### 4.5 OfTI EMP Staff Competence, Training and Awareness

##### 4.5.1 Project Staff Competence

40. In line with the overarching HSE Plan and Competence and Training Management Standard, all NnGOWL personnel shall have the required skills, education, training, and experience to perform their tasks in a way that meet HSE objectives.

41. All Project roles are allocated a series of competency requirements and individuals are matched to those roles based on the extent to which they meet those requirements. Performance appraisal is undertaken annually, and as a result of the appraisal process, requirements for further training are identified.

##### 4.5.2 Contractor Competence

42. NnGOWL assesses overall competence and suitability of all contractors prior to their engagement on the Project. Contractors are required to complete prequalification HSE questionnaires and have to demonstrate that they operate an Environmental Management System (EMS) appropriate to their scope of work as part of the tendering process. Appointed contractors are subject to ongoing performance review depending on the duration of their scope of work and must maintain the status of their EMS for the duration of their works.

##### 4.5.3 Training and Awareness

43. Training and awareness specific to this OfTI EMP will be delivered to NnGOWL personnel and contractors. This will be delivered through inductions and ongoing awareness raising.

44. NnGOWL will ensure that a dedicated section is included within wider Project induction material(s) to cover environment and consents issues, including but not limited to:
- Identification of specific environmental risks associated with the work to be undertaken on site by the inductee;
  - Identification of specific environmental risks which relate to specific areas of the Project site;
  - Any site, time or task specific mitigation that is required in order to comply with commitments made in the Application or subsequent Consent Plans;
  - Roles and Responsibilities and contact details; and
  - Environmental Incident and Emergency Response Procedures.
45. All NnGOWL construction personnel and Contractors will receive a Project induction.
46. 'Tool Box Talks' (TBT's) will be incorporated into daily / weekly briefings as required and will provide specific information to personnel involved in certain activities. These talks will highlight environmental risks and confirm control measures to implement and mitigate the likelihood of the work impacting upon the environment.
47. Subjects of relevance to the offshore works for inclusion within toolbox talks may comprise, but are not limited to:
- AEZs and the necessary mitigation measures to be followed;
  - Dealing with oil and chemical spills (see Annex 2 – Construction Phase Marine Pollution Contingency Plan);
  - Minimising waste and waste management;
  - General good environmental actions and 'house-keeping'; and
  - Environmental Incident Reporting.
48. Records of training such as TBT's delivered to NnGOWL personnel and Contractors will be maintained and filed and will include the content of the training delivered, record of attendance and schedule of review.

## 4.6 OfTI EMP Communications and Reporting

### 4.6.1 Internal Communications

49. There are a range of opportunities for the exchange and sharing of HSE information across the Project, including:
- Project and company inductions;
  - NnGOWL Project meetings – HSE is a fixed agenda item;
  - Site Meetings – HSE is a fixed agenda item;
  - Monthly Contractor meetings – HSE is a fixed agenda item;
  - NnGOWL HSE meetings – NnGOWL holds regular HSE-specific meetings with staff to ensure that people are able to raise concerns and get feedback on ongoing matters;
  - Daily HSE Safety Messages issued to all members of the Project team and displayed in the Project office, to be discussed in any internal and external meetings held that day;

- Monthly HSE Reports – every month a full report of all Project HSE leading and lagging indicators is prepared and shared with the team; and
- Task/area specific HSE tool-box talks - these will be held before tasks with specific HSE and/or mitigation are undertaken.

4.6.2 NnGOWL ECoW Communications (Construction Phase only)

50. The ECoW has a key role in the delivery of the OfTI EMP and ongoing monitoring of compliance. In fulfilling this role, NnGOWL’s ECoW shall:

- Establish direct contact with Contractors and provide support to the NnGOWL consents team and HSE team on a day to day basis;
- Be in direct contact with the Archaeological Consultant and CFLO when required;
- Report directly to MD-LOT on compliance with this OfTI EMP; and
- Provide environmental input and where required attend NnGOWL meetings.

4.6.3 External Communications

51. The OfTI EMP consent condition requires that the OfTI EMP sets out:

*The reporting mechanisms that will be used to provide the Scottish Ministers and relevant stakeholders (including, but not limited to, the Joint Nature Conservation Committee (JNCC), SNH, SEPA, RSPB Scotland, Maritime Coastguard Agency (MCA) and Northern Lighthouse Board NLB) with regular updates on construction activity, including any environmental issues that have been encountered and how these have been addressed.*

During construction the NnGOWL consents team supported by the NnGOWL ECoW will liaise with MD-LOT and other stakeholders on matters relating to environmental management. The NnGOWL ECoW will also be responsible for direct reporting to MD-LOT on compliance with this OfTI EMP.

52. During operations the NnGOWL Offshore Environment Manager will be responsible for direct reporting to MD-LOT on compliance with this OfTI EMP as and when required.
53. Specific reporting on construction progress and environmental issues encountered will be completed according to the means set out in 4-20 below.

Table 4-20 : OfTI EMP Construction Phase Regular Reporting

COMMUNICATION TYPE	FREQUENCY	RELEVANT STAKEHOLDERS
ECoW Compliance Report, covering construction progress and agreed environmental reporting criteria.	Monthly	MD-LOT
NnGOWL consents team and NnGOWL’s ECoW meetings with MD-LOT	As required	MD-LOT
NnGOWL consents team updates	As required	FTRAG and key stakeholders

54. In addition to the specific reporting requirements under the OfTI EMP condition, a number of other returns or reporting requirements relevant to environmental management are set out in the Marine

Licence. The relevant conditions and reporting requirements are set out in Table 4-21 below. Reports will be submitted to MD-LOT by the NnGOWL consents team.

Table 4-21 : Other reporting requirements

TOPIC	CONSENT CONDITION REFERENCE	FREQUENCY	CONDITION REQUIREMENTS
<b>Force Majeure</b>	OfTW Condition 3.1.4	In event of an incident	<p>Should the Licensee or any of their agents, contractors or Subcontractors, by any reason of force majeure deposit anywhere in the marine environment any substance or object, then the Licensee must notify the Licensing Authority of the full details of the circumstances of the deposit within 48 hours of the incident occurring (failing which as soon as reasonably practicable after that period of 48 hours has elapsed).</p> <p>Force majeure may be deemed to apply when, due to stress of weather or any other cause, the master of a vessel or vehicle operator determines that it is necessary to deposit the substance or object other than at the Site because the safety of human life or the vessel, vehicle or marine structure is threatened. Under Annex II, Article 7 of the Convention for the Protection of the Marine Environment of the North-east Atlantic, the Licensing Authority is obliged to immediately report force majeure incidents to the Convention Commission.</p>
<b>Chemical usage</b>	OfTW Marine Licence Condition 3.1.8	Prior to chemical usage in an open system during the construction phase	<p>The Licensee must ensure that all chemicals which are to be utilised in an open system during the construction of the Project have been approved in writing by the Licensing Authority prior to use. Requests for approval must be submitted in writing to the Licensing Authority no later than one month prior to its intended.</p> <p>The Licensee should take all practicable steps to avoid leakages from a closed containment system into the Scottish marine area. Any such leakages must be reported to the Licensing Authority as soon as practicable.</p>
<b>Fluorinated gas emissions</b>	OfTW Marine Licence Condition 3.1.9	Annually or in the event of a leakage	<p>The Licensee must ensure that all equipment to be utilised in the Works which contains fluorinated greenhouse gases must take precautions to prevent the unintentional release ('leakage') of those gases. Fluorinated greenhouse gases in quantities of 5 tonnes of CO2 equivalent or more and not contained in foams, is checked for leakage in accordance with Article 4 of the Fluorinated Greenhouse Gases (F-Gas Regulation). Records of checks must be kept in accordance with Article 6 of the F-Gas Regulation. These records must be submitted to the Licensing Authority annually and immediately in the event of discovery of leakage.</p> <p>Where the equipment is subject to checks for leakage (Article 4(1) of the F-Gas Regulation) and leakage in the equipment has been repaired, the Licensee must ensure that the equipment is checked by a suitably certified person within one calendar month after the repair to verify that the repair has been effective. In such event,</p>

TOPIC	CONSENT CONDITION REFERENCE	FREQUENCY	CONDITION REQUIREMENTS
			the Licensing Authority must be informed of the date of discovery, date of repair and date of inspection.
<b>HSE</b>	OfTW Marine Licence Condition 3.2.1.1	In event of an incident	In the event of any breach of health and safety or environmental obligations relating to the Works during the period of this Licence, the Licensee must provide written notification of the nature and timing of the incident to the Licensing Authority within 24 hours of the incident occurring. Confirmation of remedial measures taken and/or to be taken to rectify the breach must be provided, in writing, to the Licensing Authority within a period of time to be agreed by the Licensing Authority.
<b>Deposits</b>	OfTW Marine Licence Condition 3.2.3.1	Monthly during construction phase or in event of an incident	Detailed Transport Audit Report (TAR) each month during the construction phase of the Works.  If the Licensee becomes aware of any substances, objects or materials on the TAR that are missing, or that an accidental deposit has occurred, the Licensee must notify the Licensing Authority as soon as practicable.  If the Licensing Authority is of the view that any accidental deposits have occurred and should be removed, then the materials must be removed by the Licensee as soon as is practicable and at the Licensee's expense.
<b>Marine mammals</b>	OfTW Marine Licence Condition 3.2.2.2	Six months following commencement of construction and and thenceforth at such other periods as agreed with the Licensing Authority.	The Marine Mammal Observer (MMO) must maintain a record of any sightings of marine mammals and maintain a record of the action taken to avoid any disturbance being caused to marine mammals during noisy activities (such as piling). The Licensee must provide the Licensing Authority with the MMO's records no later than 6 months following Commencement of the Wind Farm, and thenceforth at such other periods as agreed with the Licensing Authority.

#### 4.6.4 Incident Reporting

55. NnGOWL are responsible in undertaking the operation and maintenance of the OfTI assets up to the point of transfer of the assets to an Offshore Transmission Operator (OfTO), thereafter the OfTO will be responsible for the above offshore transmission infrastructure (OfTI) in relation to incident reporting.
56. In the event that an environmental or pollution incident occurs and following any required statutory notifications, the Contractor will notify NnGOWL as soon as possible; the Contractor will have the prime responsibility for responding to any incident.
57. An incident response shall be executed in accordance with the Contractors own, compliant response procedures, and/or procedures set out in relevant Consent Plans.
58. The environmental incidents to which there are specific response procedures are listed in Table 4-19.

Table 4-19: NnGOWL incident reporting procedures

INCIDENT TYPE	LOCATION OF NNGOWL RESPONSE PROCEDURE
Pollution incident (oil or chemical spill)	Annex 2 – Construction Phase Marine Pollution Contingency Plan
Pollution incident (oil or chemical spill)	Annex 2 – Construction Phase Marine Pollution Contingency Plan
Archaeology – infringement on AEZs or archaeological discoveries	Refer to the WSI & PAD
Dropped Objects	Section 5.5
Non-compliance with consents conditions or legal requirements	Non-compliance reporting proforma

#### 4.7 Monitoring of OfTI EMP Performance and Compliance (Construction Phase)

59. Compliance with the OfTI EMP and other relevant Consent Plans will primarily be monitored by NnGOWL’s ECoW. NnGOWL’s ECoW monitoring activities will be summarised in the ECoW Monthly Compliance Reports.
60. In addition, the NnGOWL Health and Safety Advisor monitors contractor HSE policies and procedures and ongoing contractor HSE performance.
61. If any non-compliances are observed on-site an on-site risk assessment will be undertaken (Point of Work Risk Assessment) detailing any required immediate corrective actions to be taken will be issued.
62. MD-LOT may also undertake monitoring of compliance with the consents and approved Consent Plans through periodic Site inspections. With appropriate notification, NnGOWL will facilitate access to all offshore construction activities for this purpose.
63. Any observations or corrective actions arising from monitoring activities and inspections will be addressed as necessary, with procedures updated in the OfTI EMP as required.

#### 4.8 OfTI EMP Document Management (Construction Phase)

64. The approved OfTI EMP will be a controlled document and will be formally issued to Contractors via NnGOWL’s document management system.
65. A current copy of the OfTI EMP will be held at the following locations:
  - NnGOWL Project Office;
  - At the premises of the main Contractors acting on behalf of NnGOWL;
  - All site offices dealing with marine operations including the NnGOWL Marine Coordination Centre; and
  - With NnGOWL’s ECoW.
66. NnGOWL will ensure that MD-LOT are provided with the most up to date copy of the OfTI EMP.
67. A register of document versions and issue dates will be maintained by NnGOWL.

#### 4.9 OfTI EMP Document Management (Operational Phase)

68. The approved OfTI EMP will be a controlled document and will be formally issued to Contractors via NnGOWL's document management system.
69. Until such time as the OfTI assets are transferred to the OfTO, a current copy of the OfTI EMP will be held at the following locations:
- NnG Control Room, Operational Control Centre Eyemouth;
  - NNG Control Room, Operational Control Centre France;
  - At the premises of the main Contractors acting on behalf of NnGOWL;
  - With NnGOWL's Offshore Environment Manager.
70. NnGOWL and thereafter the OfTO will ensure that MD-LOT are provided with the most up to date copy of the OfTI EMP.
71. A register of document versions and issue dates will be maintained by NnGOWL and subsequently by the OfTO.

## 5 Environmental Management and Mitigation Measures

72. The requirement to construct and operate the Project in accordance with the environmental management and mitigation measures identified in the Application arises from specific requirements in the consents related to this OfTI EMP, with the relevant condition set out in Table 1-2, requiring that the OfTI EMP:

*‘must be in accordance with the Application insofar as it relates to environmental management measures.’*

And,

*Address... mitigation measures to prevent significant adverse impacts to environmental interests, as identified in the Application and pre-consent and pre-construction surveys, and include the relevant parts of the CMS;’*

73. The following sections set out in this OfTI EMP (and the other referenced Consent Plans) are in accordance with the commitments made in the EIA Report and the Addendum. In addition, this section incorporates any other commitments relevant to environmental management and mitigation arising from the consents.

### 5.1 EIA Report Compliance Register

74. A Compliance Register for the Project has been developed that identifies the environmental management, mitigation (and also monitoring) measures set out in the NnGOWL Application including the EIA Report and Addendum, and the Project Consents, and any other commitments made by NnGOWL to environmental management and mitigation. An excerpt of the compliance register detailing the environmental management measures and mitigation commitments detailed within the EIA Report and Addendum are set out under Annex 1 - NnGOWL Application Commitments Register.

75. The Register addresses the environmental management and mitigation measures relevant to both the construction and operational phases of the Project, but also for each stage of construction as defined by the CMS, in relation to each environmental receptor as per the EIA Report and Addendum.

### 5.2 Minimise Risk of Vessel Disturbance

76. In addition to the vessel management procedures set out in OfTI NSVMP that shall be complied with throughout construction and operation of the Project vessel masters will be required to ensure that disturbance to marine wildlife is minimised as far as practicable. Where appropriate, and safe to do so, vessel masters will adhere to the following principles, in accordance with the Scottish Marine Wildlife Watching Code (SMWWC):

- Consider adhering to existing shipping lanes or indicative transit routes in passage planning in accordance with the OfTI NSVMP;
- Avoid sudden changes in speed or direction in transit to and from the Wind Farm Area or Offshore Export Cable Corridor as far as possible and unless required for health and safety reasons or other emergency purposes;
- Keep a good look forward (this particularly applies to smaller vessels);
- Do not intentionally pursue marine mammals or birds; and,
- Do not instigate contact with marine mammals or birds.

### 5.3 Chemical Usage

77. The requirement to set out the environmental management framework for the use of chemicals during the construction of the Project arises from the requirements detailed in the Marine Licence (See Table 1-2).
78. The following sections set out the overarching OfTI EMP framework relating to the use of chemicals during the construction phase, and specifically sets out:
- Approved notified chemicals; and
  - Measures for use, transport and storage.

#### 5.3.1 Environmental Management Associated with Chemical Usage

79. The List of Notified Chemicals is a product of the OCNS which manages chemical use and discharge by the UK and Netherlands offshore petroleum industries. Construction activities may require the use of chemicals that are not listed in the OCNS. NnGOWL will notify MD-LOT of all chemicals to be used during construction prior to use. As required by the OfTW Marine Licence Conditions, and until such time as the transfer of OfTI to the OfTO, NnGOWL will seek approval for any chemicals to be used in an open system prior to its use in offshore operations.
80. NnGOWL will require that Contractors comply with the Marine Licence conditions (as set out above) throughout the construction phase of the Project. Table 5-1 sets out measures that Contractors will be required to implement, as appropriate, when using chemicals in accordance with the consents.
81. In addition, NnGOWL require that all Contractors have in place appropriate procedures for the use, transport and storage of chemicals during the construction phase of the Project, as detailed, but not limited to, those set out in Table 5-1.

*Table 5-1: Potential chemicals spill scenarios and control measures to be implemented during construction.*

INCIDENT SCENARIO	CONTROL MEASURES	LIKELIHOOD WITH CONTROL MEASURES
<b>Incident</b>	<p>All vessels will comply with the measures set out in the NnGOWL NSVMP to prevent vessel to vessel collision, vessel to structure allisions and vessel stranding / grounding.</p> <p>Chemicals will, where relevant, be selected, stored and managed in accordance with the Offshore Chemical Regulations 2002 (as amended).</p>	Very low
<b>Leakage within Turbines</b>	<p>All equipment shall be operated and maintained in good order and in accordance with legal requirements.</p> <p>Turbine sensors will enable early detection of loss of fluid and leaks.</p> <p>There is a bunded area within the nacelle to collect lubricating oil in the unlikely event of a leak.</p>	Low

INCIDENT SCENARIO	CONTROL MEASURES	LIKELIHOOD WITH CONTROL MEASURES
	<p>Equipment including hoses, pipes and seals shall be routinely checked during planned maintenance programmes.</p> <p>Chemicals will, where relevant, be selected, stored and managed in accordance with the Offshore Chemical Regulations 2002 (as amended).</p>	
<p><b>Loss of chemical load from vessel collision/allision, or stranding/grounding of vessel.</b></p>	<p>Preparation and review of task-specific risk assessments and method statements.</p> <p>Personnel shall be trained in the correct handling and use of chemicals.</p> <p>Personnel shall be trained in spill prevention awareness, and in the use of spill kits.</p> <p>Spill kits shall be readily available for mopping up any minor spills.</p> <p>All hazardous substances shall have a Safety Data Sheet (SDS) which is intended to provide procedures for handling or working with that substance in a safe manner. The handling and use of chemicals and hazardous substances shall be in compliance with the information on the SDS.</p> <p>COSHH assessments should be conducted for Development specific hazardous substances.</p> <p>Segregated storage facilities will be used to control the separation of hazardous substances.</p> <p>Chemicals will, where relevant, be selected, stored and managed in accordance with the Offshore Chemical Regulations 2002 (as amended).</p>	<p>Low</p>
<p><b>Leakage of fluorinated greenhouse gases (F-gases) from Switchgear</b></p>	<p>All construction and O&amp;M activities where handling F-Gases will be required will be done so by qualified technicians who hold a F-Gas handling certificate.</p> <p>All equipment containing F-gases will be checked regularly or be fitted with a pressure monitoring device that will set off an alarm in the event of a drop in pressure.</p> <p>During Construction notes of the following items will be recorded and kept for a minimum of 5 years:</p> <ul style="list-style-type: none"> <li>Quantity of F-Gas in the equipment when it's installed;</li> </ul>	<p>Low</p>

INCIDENT SCENARIO	CONTROL MEASURES	LIKELIHOOD WITH CONTROL MEASURES
	<ul style="list-style-type: none"> <li>Quantity of SF6 added during any maintenance (e.g. installation or leak repairs);</li> <li>Quantity of SF6 recovered during any maintenance works;</li> <li>Details (name, address and certificate number if relevant) of any companies that work on the equipment;</li> <li>Dates and results of all mandatory leak checks.</li> </ul> <p>In the event of a leak being identified remedial action will be taken as soon as practicable and reported to MD-LOT. Follow inspections will take place within one month to ensure any remedial action is successful.</p>	

#### 5.4 Invasive Non-Native Marine Species

82. The requirement to set out the environmental management framework for the management of invasive non-native species (INNS) arises from specific requirements in the consents related to this OfTI EMP, with the relevant condition set out in Table 1-1, requiring that the OfTI EMP:

*“...address, but not be limited to, the following overarching requirements for environmental management during construction:*

*Management measures to prevent the introduction of invasive non-native marine species.”*

83. The following sections set out the overarching OfTI EMP framework for the management of INNS during the construction phase, and specifically sets out:

- Relevant legislation to be observed; and
- NnGOWL environmental management requirements to be adopted.

##### 5.4.1 Relevant legislation and guidelines

84. The legislation and guidelines set out in Table 5-2 is relevant to the control of INNS.

Table 5-2: Legislation and guidance relating to the management and control of INNS

LEGISLATION / GUIDELINES	RELEVANT REQUIREMENT
<p><b>International Convention for the Control and Management of Ships’ Ballast Water and Sediments (BWM) – adopted 2004</b></p>	<p>Ballast Water Exchange Management Plan</p> <p>Ballast Water Record Book</p> <p>International Ballast Water Certificate</p>

LEGISLATION / GUIDELINES	RELEVANT REQUIREMENT
The Merchant Shipping (Anti-Fouling Systems) Regulations 2009	International Anti-fouling System Certificate
Resolution MEPC.207(62) 2011 Guidelines for the Control and Management of Ships Biofouling to Minimize the Transfer of Invasive Aquatic Species	General guidance on minimising biofouling risks

#### 5.4.2 NnGOWL INNS environmental management requirements

85. In adopting management measures to prevent the introduction of INNS, NnGOWL until such time as the transfer of OfTI to the OfTO, will:

- Require that all Contractors adopt the relevant legislative and good practice requirements;
- Require that all Contractors produce OfTI EMPs / adhere to NnGOWL OfTI EMPs setting out in detail procedures to prevent the introduction of INNS; and
- Ensure NnGOWL reviews Contractor OfTI EMPs / audits / monitors contractor procedures for compliance.

86. Specific measures that NnGOWL will require are adopted by all Contractors will include:

- A requirement for all vessels of 400 gross tonnes and above to be in possession of a current international Anti-fouling System (AFS) certificate;
- A requirement for all vessels of 24 m or more in length (but less than 400 gross tonnes) to carry a declaration on AFS signed by the owner or authorised agent accompanied by appropriate documentation;
- A requirement for the details of all ship hull inspections and biofouling management measures be documented by the Contractors and, where applicable, recorded in the Planned Maintenance System;
- A requirement for all submersible / immiscible equipment e.g., Remote Operated Vehicles (ROVs) (if required) to be subject to pre-use and post-use checks including checks for the presence of marine growth following check-clean-dry principles<sup>1</sup>. All equipment will be required to be free of marine growth prior to mobilisation; and
- A requirement for all vessels to be compliant (where applicable) with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention, developed and adopted by the International Maritime Organisation (IMO, and which entered into force on the 8<sup>th</sup> September 2017)) (i.e., ships 400 gross tonnes and above designed/constructed to carry ballast water and operating in the waters of more than one Member State), specifically:
  - A requirement, where relevant, for the management of ballast water in accordance with an approved Ballast Water and Sediments Management Plan and records of such management in a Ballast Water Record Book in accordance with the provisions of the Convention;

<sup>1</sup> More information on the check-clean-dry principle can be found here: <http://www.nonnativespecies.org/checkcleandry/>

- A requirement to ensure, where appropriate, that ballast water management meets the ballast water performance standards as detailed in the BWM Convention;
- A requirement, where possible, and if required, for Ballast Water Exchange to take place at least 50 nm from the nearest land and in 200 m water depth; and
- Other methods of ballast water management may also be accepted as alternatives to the Ballast Water Exchange standard and Ballast Water Performance standard, provided that such methods ensure at least the same level of protection to the environment, human health, property or resources, and are approved in principle by IMO's Marine Environment Protection Committee (MEPC).

87. In addition, NnGOWL until such time as the transfer of OfTI to the OfTO, will require that Contractors comply, where appropriate, with the recommendations of Resolution MEPC.207(62) 2011 guidelines for the control and management of ship's biofouling to minimize the transfer of invasive aquatic species including, for example, the implementation of a Biofouling Management Plan outlining the biofouling management measures to be undertaken on vessels.

#### 5.5 Seabed Deposits and Notification of Dropped Objects

88. The requirement to record, notify and potentially recover objects lost or accidentally deposited on the seabed during construction and operation works arises from specific requirements in the consents; the relevant consents conditions are set out in Table 5-3 below (the specific elements of the consents conditions addressed by the procedures described in this section are highlighted in bold).
89. The TAR template required under Wind Farm Marine Licence and OfTW Marine Licence Condition 3.2.3.1 was provided to MD-LOT for approval in advance of commencement of construction. Reporting requirements related to the TAR are set out in Table 5-3.
90. Notification of dropped objects during the construction or operational phase will be completed using MD-LOT's Offshore Wind & Marine Renewables Dropped Object Proforma. The process to be followed in the event of any construction or operational staff becoming aware that any object has been accidentally (or by need of Force Majeure) dropped or otherwise deposited is set out below in Table 5-3.
91. A copy of the dropped object procedure (Table 5-3) and the Dropped Object Notification Proforma will be available on all construction and operational vessels. Relevant staff will be inducted on the dropped object procedures.
92. Note that separate provisions apply for the accidental loss of pollutants; these procedures are set out in the MPCP (Annex 2 – Construction Phase Marine Pollution Contingency Plan and Annex – 3 Operational Phase Marine Pollution Contingency Plan) and must be referred to in place of the following (see also Section 5.7 of this OfTI EMP).

Table 5-3: Dropped object process and remediation process.

INTRODUCTION
<p>This dropped objects procedure identifies the measures to be put in place to manage dropped objects during the construction phase of the Project, including recovery where possible, and the recording of losses. This also includes procedures for communicating deposits made under circumstances of Force Majeure.</p> <p>Dropped objects can present a significant hazard to other sea users and the marine environment. Submission of the Offshore Wind and Marine Renewables Dropped Object Form enables MD-LOT, in consultation with other relevant stakeholders, to decide what action should be taken and to allow notification of other sea users of any navigational hazards.</p>
PREVENTION
<p>Consideration should be given to minimising wherever possible the potential for objects to be dropped or otherwise accidentally deposited. Each Contractor should have its own process for ensuring equipment and materials are adequately stored and controlled and that staff are adequately trained and briefed on avoiding dropped objects or accidental deposits, and in the event that they do occur on this notification procedure.</p> <p>Each Contractor should complete the required TAR to record all materials, equipment and components being loaded and transported and deposited under the licensable activities permitted by the Marine Licence. The Contractor will be responsible for ensuring that the relevant Subcontractor details are entered onto the TAR and will issue these to the Marine Coordinator during construction on a monthly basis or to the NnG Control Room during operation &amp; maintenance as and when required until such time as the transfer of OfTI to the OfTO..</p>
IDENTIFICATION
<p>During construction, if any Contractor (or NnGOWL through review of the TAR) becomes aware of any substance or objects on the TAR that are missing, or an accidental deposit occurs (for example by personnel observing or reporting that an object has been lost) the responsible Contractor will log the loss as soon as becoming aware of the incident and notify the NnGOWL Marine Coordinator of the incident, who will notify HM Coastguard.</p>
NOTIFICATION
<p>The contractor will also complete the Offshore Wind and Marine Renewables Dropped Object Form and submit it to the NnGOWL Marine Coordinator and ECoW during construction and to the NnG Control Room and Offshore Environment Manager during operation &amp; maintenance. The Marine Coordinator/Offshore Environment Manager will notify MD-LOT and other relevant stakeholders as identified on the proforma by submitting the completed Offshore Wind and Marine Renewables Dropped Object Form.</p> <p><b>Note that every reasonable measure should be taken to immediately retrieve dropped objects where this is considered reasonably practicable</b> (a Marine Licence is not required for such recovery under The Marine Licensing (Exempted Activities) (Scottish Inshore and Offshore Regions) Amendment Order 2012).</p> <p>MD-LOT must also be notified of any activities to recover dropped objects that have been conducted but not been successful (or are considered unlikely to be successful) or that are planned (but may take some time) at the time of notification.</p>
RECOVERY
<p>MD-LOT will provide advice on appropriate remedial action in relation to each incident reported.</p> <p>MD-LOT may deem it necessary to carry out a side scan survey to locate the substances or objects and may require the deposits to be removed where they are judged to pose a hazard (as set out under OfTW Marine Licence Condition 3.1.10).</p>

Proposals for recovery of the dropped object must be provided to MD-LOT

## 5.6 Unexploded Ordnance

93. Prior to the construction phase a UXO survey and clearance programme was conducted, therefore the risk of discovering previously unidentified UXO will have been reduced to as low as reasonably practicable.
94. However, in the event of a UXO discovery, the Contractors shall inform the NnGOWL HSE Manager and Marine Coordinator during construction and the NnG Control Room and Offshore Environment Manager during operations (until such time as the OfTO transfer) immediately.
95. In the unlikely event of needing to detonate a UXO, MD-LOT will be consulted and licences sought as appropriate.

## 5.7 Pollution Prevention and Contingency Planning

96. The requirement to set out the environmental management framework for the pollution prevention and contingency planning arises from specific requirements in OfTW Marine Licence related to this OfTI EMP, with the relevant condition set out in Table 2.1, requiring that the OfTI EMP:

*'address, but not be limited to, the following overarching requirements for environmental management during construction:*

*Pollution prevention and control method statement, including contingency plan'*

97. In the event of a pollution incident, construction personnel should refer immediately to Annex 2 – Construction Phase Marine Pollution Contingency Plan and O&M personnel should refer to Annex 2 – Construction Phase Marine Pollution Contingency Plan of this OfTI EMP for details on appropriate response procedures.

## 5.8 Waste Management

98. The requirement to set out the environmental management framework for the management of waste generated by the construction and operation (until such time as the OfTO transfer) of the Project arises from specific requirements in the consents related to this OfTI EMP, with the relevant condition set out in Table 1-1, requiring that the OfTI EMP:

*"...address, but not be limited to, the following over-arching requirements for environmental management during construction:*

*A site waste management plan (dealing with all aspects of waste produced during the construction period), including details of contingency planning in the event of accidental release of materials which could cause harm to the environment. Wherever possible the waste hierarchy of reduce, reuse and recycle should be encouraged"*

99. This section sets out the NnGOWL waste management framework that will be implemented through construction and operation of the Project.

### 5.8.1 Relevant regulatory framework

#### Definition of waste

100. The definition of “waste” is taken from Article 3(1) of the revised European Waste Framework Directive (WFD) (2008/98/EC), which states that waste is “any substance or object which the holder discards or intends or is required to discard”.

101. “Discard” includes the recovery and recycling of a subject or object as well as its disposal. The decision on whether something is discarded must take account of all the circumstances (for example, the nature of the material, how it was produced and how it will be used) and have regard to the aims of the WFD, which include “the protection of human health and the environment against harmful effects caused by the collection, transport, treatment, storage and tipping of waste”.

**Legislation and Guidance**

102. Table 5-4 sets out the relevant legislative drivers for processing and disposing of waste that will be generated during construction and operation of the Project.

*Table 5-4: Relevant waste management legislation that will be complied with during construction and operation and maintenance*

WASTE MANAGEMENT LEGISLATION	SUMMARY OF REQUIREMENTS
European Waste Framework Directive (WFD) (2008/98/EC)	Sets out the key waste management requirements where onshore disposal is required. Additional detail described under national legislation below.
Waste (Scotland) Regulations 2012 SSI 148 Waste Management Licensing (Scotland) Regulations 2011 SSI 228 Environmental Protection (Duty of Care) (Scotland) Regulations 2014 SSI 4	Transposes the requirements of the WFD into Scottish legislation.  Requires all businesses and organisations that produce waste to take all reasonable measures to prevent waste, and to apply the waste hierarchy (refer to Section 5.8.3).
International Convention for the Prevention of Pollution from Ships (MARPOL 73/78) Annex IV (sewage) and Annex V (garbage)	Sets out the requirements of waste disposal generated at sea. Under the Convention, the North Sea is designated as a Special Area where the disposal of any waste (except food waste) offshore is prohibited.
Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations 2008	Transposes the MARPOL 73/78 Convention into UK legislation and which places a number of obligations on vessels in terms of managing waste.
Special Waste (Scotland) Regulations 1996 SI 972	Sets out the requirements for the preparation of Consignment Notes for the handling and carriage of special waste (including hazardous waste) as defined within the regulations.  Requires the removal of ships’ waste to reception facilities and also the avoidance of mixing waste streams.

103. Additional relevant policy and guidance documents include:

- Duty of Care Code of Practice 2016<sup>2</sup>;
- SEPA guidance on the production of Site Waste Management Plans 2010<sup>3</sup>;

<sup>2</sup> DEFRA (2016) Waste Duty of Care Code of Practice

<sup>3</sup> SEPA (2010) Site Waste – A Simple Guide to Site Waste Management Plans

- UK Marine Policy Statement 2011; and
- Zero Waste Scotland 2014<sup>4</sup>.

#### 5.8.2 Types of Waste

104. The potential waste streams generated by the construction and operation of the Project can be subdivided into three categories:

- Inert;
- General (non-hazardous); and
- Hazardous.

105. Non-hazardous wastes are accepted at SEPA regulated non-hazardous or inert licenced landfill sites whilst hazardous wastes are accepted at hazardous licenced landfill sites within Scotland. Technical guidance on the interpretation of the WFD definition and classification of hazardous waste versus non-hazardous waste is provided by the Joint Agency technical guidance (WM2): Hazardous Waste (2013) and draft guidance, in preparation, (WM3) Draft Waste Classification (2015).

106. Any unidentified wastes must be treated as hazardous and stored separately from other wastes pending identification and classification. Packaging and containers associated with hazardous materials shall themselves be treated as hazardous waste until such time as they have been satisfactorily cleaned.

107. In the case of construction and operational vessels, the following list provides an example of hazardous waste typically generated by a construction vessel:

- Waste Paint and Paint thinners;
- Waste oil;
- Oiled waste, including oil filters, oily rags, etc.
- Contaminated oil;
- Spent Batteries;
- Waste Anti-freeze;
- Used light bulbs/tubes; and
- All hazardous waste packaging.

#### 5.8.3 Waste management process

108. Construction and O&M waste generated from the Project will be managed according to the principles of the waste hierarchy (Figure 5-1). The waste hierarchy ranks waste management options according to what is best for the environment, giving priority to waste prevention. When waste has been generated, priority is given to preparing it for re-use, then recycling, then recovery, and last of all disposal (for example, landfill).

109. The waste hierarchy is a key element of sustainable waste management and is a legal requirement of the revised EU WFD and is central to the Waste (Scotland) Regulations 2012.

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<sup>4</sup> Scottish Government (2010) Scotland's Zero Waste Plan. <https://www2.gov.scot/Resource/0045/00458945.pdf>



Figure 5-1 Waste Hierarchy (Source: Scottish Government, 2009)

110. NnGOWL will require that all Contractors for the construction and operation (until such time as the OfTO transfer) of the Project shall:

- Produce, for NnGOWL approval, waste management procedures for their activities providing details of expected waste arisings and proposed procedures for waste management;
- Meet all relevant legislative requirements and obtain whatever additional licences are necessary in relation to waste management;
- Handle waste materials and refuse so that it causes the least possible damage and disturbance;
- Require that all waste is placed in suitable labelled containers; and
- Require that all relevant waste is brought back to shore and disposed of in accordance with the waste management framework.

## Annexes

Annex 1 - NnGOWL Application Commitments Register

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
<b>Geology and Water Quality</b>	Construction contractors will be required to produce Site Environmental Management Plans (SEMP) and Pollution Control and Spillage Response Plans prior to construction works [or similar]. These plans will reduce the probability of accidental spillage and formalise a contingency plan in the event that one does occur.	To mitigate the effects of leaks or spills on the marine environment.	EMP
<b>Physical Processes</b>	A nearshore survey will be completed to inform the design of the intertidal and nearshore cable laying, and thus minimise impacts.	To mitigate the effects on physical processes	CaP
<b>Physical Processes</b>	A variety of techniques may be employed to reduce or eliminate scour. The following measures will be considered: rock armouring, mattressing, and frond mats.	To ensure the structural integrity of installed infrastructure.	DSL; CMS; CaP
<b>Physical Processes</b>	Cables will be suitably buried or will be protected by other means when burial is not practicable.	To mitigate the effects on physical processes	CaP
<b>Air Quality</b>	As all atmospheric emissions associated with the development are from vessel emissions, total emissions will be reduced by taking total vessel emissions / fuel use into account when designing the final installation, operation and maintenance, and decommissioning strategies to minimise as far as practicable the number of vessel movements and installation time required.	To mitigate the effects on air quality	VMP
<b>Air Quality</b>	Additionally, all vessels employed during the Project development will comply with the Merchant Shipping (Prevention of Air Pollution from Ships) Regulations 2008 and where practicable, contracts with the vessels will include a requirement for energy management, to minimise energy usage.	To mitigate the effects on air quality	NSVMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
<b>Benthic Ecology; Fish and Shellfish; Commercial Fisheries</b>	Cable burial to an appropriate trenching depth to limit the rise in sediment temperature and prevent macrozoobenthic fauna from direct harm as well as limit physical changes that may impair the ecological functioning of benthic communities and to increase the distance between benthic species and electro-magnetic field (EMF) associated with subsea cabling.	To mitigate the effects on benthic habitats	CaP
<b>Benthic Ecology</b>	Conduct a pre-construction cable route survey to identify any sensitive seabed habitats. Should such habitats be recorded, the Offshore Export Cable Corridor will be micro-sited, in consultation with Scottish Natural Heritage (SNH) and other stakeholders via submission, for approval, to MD-LOT of a Cable Plan (CaP).	To mitigate the effects on benthic habitats	CaP
<b>Benthic Ecology; Fish and Shellfish</b>	Although no significant impact arising from the installation of the cables is predicted, it is considered good practice to minimise the extent of any unnecessary habitat disturbance. On this basis, material displaced as a result of cable burial activities should, where techniques allow, be back-filled in order to promote recovery.	To mitigate the effects on benthic habitats	CaP
<b>Archaeology and Cultural Heritage</b>	Direct physical impact on all sites of cultural heritage interest identified will be avoided where possible through micro-siting of both turbines and installation equipment (e.g. jack-ups).	To mitigate the effects on maritime archaeology	WSI & PAD DSL CaP EMP
<b>Archaeology and Cultural Heritage</b>	Where cultural heritage assets may potentially be subject to direct or indirect impacts, Archaeological exclusion zones (AEZ) will be implemented to prevent potential impacts from anchoring or installation of jack-up vessels. Exclusion zones of at least 100 m will be established around sites identified as being of high vulnerability, while an exclusion zone of a minimum 50 m will be established around those of medium vulnerability. In addition to the construction phase it is also anticipated that the implementation of AEZs will ensure cultural heritage assets are protected from potential impacts during the operation and	To mitigate the effects on maritime archaeology	WSI & PAD DSL CaP EMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
	decommissioning phases. Absolute exclusion zones of at least 300 m around all protected wrecks within the Development Area.		
<b>Archaeology and Cultural Heritage</b>	Following further survey or investigation confirming the nature and characteristics of an identified asset then an AEZ can be maintained or removed as appropriate and in consultation and agreement with Historic Environment Scotland (HES).	To mitigate the effects on maritime archaeology	WSI & PAD DSL CaP EMP
<b>Archaeology and Cultural Heritage</b>	The implementation and monitoring of the AEZs will be maintained through a Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) highlighted below.	To mitigate the effects on maritime archaeology	WSI & PAD DSL CaP EMP
<b>Archaeology and Cultural Heritage</b>	In order to mitigate the risk of damage to any previously unrecorded archaeological remains a WSI and PAD will be prepared to mitigate construction impacts in the event of any unexpected archaeological discoveries during construction. This protocol will also include appropriate archaeological briefings for all personnel involved in the construction, operation and decommissioning activities associated with the proposed development. The PAD will be in place for the life of the NnG Project and will be updated when required should details within the document change, for example contact details for key stakeholders.	To mitigate the effects on maritime archaeology	WSI & PAD DSL CaP EMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
<b>Archaeology and Cultural Heritage</b>	Should it not be possible to avoid sites of cultural heritage interest, a full programme of archaeological investigation, which may include diver survey or Remotely Operated Vehicle (ROV) investigation, will be undertaken to identify the nature and extent of these sites. Subject to these investigations, an appropriate mitigation strategy will be agreed with HES.	To mitigate the effects on maritime archaeology	WSI & PAD DSLIP CaP EMP
<b>Fish and Shellfish</b>	Final monitoring proposals will be discussed with the FTRAG as part of the approval process for the Project Environmental Monitoring Plan (PEMP).	To ensure a robust and appropriate monitoring strategy	PEMP
<b>Marine Mammals</b>	Pile driving will be undertaken using the lowest possible hammer energy to allow satisfactory pile installation and will implement soft starts at the beginning of pile driving operations.	To mitigate the effects of piling noise	PS
<b>Marine Mammals</b>	A detailed monitoring programme will be developed through consultation with Marine Scotland and SNH.	To ensure a robust and appropriate monitoring strategy	PEMP
<b>Marine Mammals</b>	NnGOWL will also participate in regional and national fora such as the Forth and Tay Regional Advisory Groups (FTRAG) and the Scottish Strategic Marine Environment Group (SSMEG) [or similar as superseded], through which a strategic monitoring plan will be developed.	To ensure a robust and appropriate monitoring strategy	PEMP
<b>Marine Mammals</b>	At least six months prior to the start of the development a Project Environmental Management Plan (PEMP) will be submitted to the Scottish Ministers within which details of the planned monitoring to be undertaken will be presented. A monitoring plan for marine mammals will be developed and agreed with Marine Scotland and SNH prior to the start of construction activities.	To ensure a robust and appropriate monitoring strategy	PEMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
<b>Ornithology</b>	Following consent, a Project Environmental Monitoring Plan (PEMP) will be developed and agreed with MD-LOT, in discussion with the Forth and Tay Regional Advisory Group (FTRAG).	To ensure a robust and appropriate monitoring strategy	PEMP
<b>Commercial Fisheries</b>	Establishment of and participation in a working group to assist with the following: <ul style="list-style-type: none"> <li>• Dissemination of Project information;</li> <li>• Application of safety zones and advisory safe passing distances and implications for fisheries;</li> <li>• Navigation of Project construction and maintenance works vessels to and from the site (i.e., agreement of transit lanes to minimise interference to fishing activities, agreement for 'holding' areas for vessels in the event of bad weather);</li> <li>• Procedures in the event of interactions between Project construction and fishing activities (i.e. claims for lost and/or damaged gear);</li> <li>• Burial and protection of inter-array, inter-connector and Offshore Export Cables;</li> <li>• Removal of seabed obstacles during and post-construction; and</li> <li>• Post-construction surveys and seabed rectification procedures.</li> </ul>	To mitigate the effects on commercial fisheries	FMMS
<b>Commercial Fisheries</b>	Over trawl surveys will be carried out on the Offshore Export Cable and inter-array and inter-connector cables where cable protection has been required to ensure that the protection scheme has been successful.	To mitigate the effects on commercial fisheries	CaP
<b>Commercial Fisheries</b>	Should snagging occur, the developer would work to the protocols laid out within the guidance by the FLOWW group and 'Recommendations for Fisheries Liaison: Best Practice' guidance for offshore renewable developers, in particular Section 9: Dealing with claims for loss or damage of gear (FLOWW, 2006 and 2014; BERR, 2008).	To mitigate the effects on commercial fisheries	FMMS

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
<b>Commercial Fisheries</b>	For any fisheries stakeholders significantly affected by the project, as identified in the EIA report, justifiable disturbance payments will be made following FLOWW best practice guidance.	To mitigate the effects on commercial fisheries	FMMS
<b>Shipping and Navigation; Commercial Fisheries; Other Marine Users</b>	Appropriate liaison to ensure information on the construction of the Offshore Wind Farm is circulated in Notice to Mariners, Kingfisher Bulletin, Navigation Information Broadcasts and other appropriate media. As part of the Notice to Mariners process the information will be supplied to Imray publications.	To mitigate the effects on commercial fisheries	NSVMP
<b>Shipping and Navigation; Commercial Fisheries; Other Marine Users</b>	While construction work is in progress, NnGOWL will provide the required information to the UKHO to ensure Admiralty Charts provide a note over the Wind Farm Area including position of construction buoyage.	To mitigate navigational risk	NSVMP
<b>Shipping and Navigation; Commercial Fisheries; Other Marine Users</b>	The Project construction works will be marked in line with IALA-O136, and as agreed with NLB, MCA and the Civil Aviation Authority (CAA).	To mitigate navigational risk	LMP
<b>Shipping and Navigation; Commercial Fisheries; Other Marine Users</b>	The Project will be designed in compliance with MGN543. Annex 5 (Requirements, Guidance and Operational Considerations for Search and Rescue) specifies "Standards and procedures for generator shutdown and other operational requirements in the event of a SAR, counter pollution or salvage incident in or around an OREI."	To mitigate navigational risk	LMP NSVMP
<b>Shipping and Navigation; Commercial Fisheries; Other Marine Users</b>	Creation of an ERCoP based on the MCA template and Project Safety Management Systems (SMS), in consultation with the MCA. Procedures will be followed in the event of an emergency situation during the construction phase.	To ensure appropriate provisions are in place to facilitate search and rescue operations.	ERCoP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
Shipping and Navigation	The onshore operations base will also serve as a Marine Control Centre that will monitor vessel activity (AIS and non-AIS) and record the movements of vessels around the Wind Farm Area as well as infield (company) vessels working at the Offshore Wind Farm. Possible errant vessels identified in construction areas or safety zones will be identified and contacted.	To mitigate navigational risk	NSVMP
Shipping and Navigation	Construction safety zones of 500 m around major activities will be in place to exclude vessels not associated with the construction works for the Project. Guard vessels, or another nominated vessel, will be used to monitor passing traffic and contact vessels, which could infringe the safety zones. 50 m pre-commissioning safety zones may also be included. Minimum safe passing distance may be requested by vessels where safety zones are not applicable.	To mitigate navigational risk	NSVMP
Shipping and Navigation; Commercial Fisheries; Other Marine Users	NnGOWL will provide the required information to the UKHO so that the Project can be charted by using the magenta turbine tower chart symbol found in the publication NP5011 - Symbols and Abbreviations used in Admiralty Charts. The buried, subsea cables associated with the Project will also be charted on the appropriate scale charts. Offshore Export Cables will be charted by the UK Hydrographic Office on the appropriate scale charts who may provide a note on the charts to state no anchorage areas over charted cables.	To mitigate navigational risk	NSVMP
Shipping and Navigation; Commercial Fisheries; Other Marine Users	During Operation and Maintenance appropriate information will be circulated detailing any major maintenance of the wind farm via Notice to Mariners, Kingfisher Bulletin, Navigation Information Broadcasts and other appropriate media.	To mitigate navigational risk	NSVMP
Shipping and Navigation	During the operational phase, the Project will be marked in line with IALA-O136, and as agreed with NLB, MCA and CAA.	To mitigate navigational risk	LMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
Shipping and Navigation	The lowest point of rotor sweep will meet the MCA and RYA recommendation of 22 m above MHWS.	To mitigate navigational risk	DSLP
Shipping and Navigation	Cables will be protected appropriately taking into account fishing and anchoring practices. Positions of the cable routes will be notified to Kingfisher Information Services – Offshore Renewables Cable Awareness (KIS - ORCA) for inclusion in cable awareness charts and plotters for the fishing industry.	To mitigate navigational risk	CaP; NSVMP
Shipping and Navigation; Commercial Fisheries; Other Marine Users; Aviation	The Project will be operated as required in MGN543. Annex 5 (Requirements, Guidance and Operational Considerations for Search and Rescue) specifies Standards and procedures for generator shutdown and other operational requirements in the event of a SAR, counter pollution or salvage incident in or around an Offshore Renewable Energy Installations (OREI).	To mitigate navigational risk	NSVMP
Shipping and Navigation; Commercial Fisheries; Other Marine Users; Aviation	Creation of an ERCoP based on the MCA template and Project SMS, in consultation with the MCA. Procedures will be followed in the event of an emergency situation during the operational phase.	To ensure appropriate provisions are in place to facilitate search and rescue operations.	ERCoP
Shipping and Navigation; Commercial Fisheries;	Periodic and planned surveys of cables will be undertaken to monitor burial depths/protection and seabed mobility (cable movement).	To mitigate navigational risk	CaP
Shipping and Navigation	Safety zones of 500 m around major maintenance activities to exclude vessels not associated with the works from the offshore site. Guard vessels, or another nominated vessel, will be used to monitor passing traffic and contact vessels, which could infringe the safety zones. Minimum safe passing distance may be requested by vessels where safety zones are not applicable.	To mitigate navigational risk	NSVMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
<b>Shipping and Navigation; Commercial Fisheries; Other Marine Users</b>	Appropriate liaison to ensure information on the decommissioning of the Offshore Wind Farm is circulated in Notice to Mariners, Kingfisher Bulletin, Navigation Information Broadcasts and other appropriate media.	To mitigate navigational risk	NSVMP
<b>Aviation</b>	During construction information will be circulated via Notice to Airman (NOTAM) and other appropriate media to ensure information on the construction of the wind farm is promulgated to aviation stakeholders.	To mitigate the risk to aviation stakeholders	NSVMP
<b>Aviation</b>	The UK Hydrographic Office (UKHO) will be provided with the positions and maximum heights of the wind turbines and construction equipment above 150 m LAT. Coordinates and maximum heights of the wind turbines will be provided to the UKHO for aviation charting purposes within one month of the final commissioning of the Project. The UK IAIP is updated on a monthly basis under the Aeronautical Information Regulation and Control (AIRAC) system. Information provided under the AIRAC system shall be distributed by AIS at least 42 days in advance of the effective date with the objective of reaching recipients at least 28 days in advance of the effective date.	To mitigate the risk to aviation stakeholders	NSVMP
<b>Aviation</b>	The Project construction works will be marked in line with CAP 393 (CAA, 2017) and CAP 437 (CAA, 2016a) and as agreed with the CAA. A Lighting and Marking Plan will be submitted for approval, to MD-LOT outlining the Projects lighting and marking strategy to mitigate the risk to aviation safety during construction of the Project.	To mitigate the risk to aviation stakeholders	LMP
<b>Aviation</b>	The Project will be designed as per MGN 543, including Annex 5 which details “Standards and procedures for generator shutdown and other operational requirements in the event of a SAR, counter pollution or salvage incident in or around an Offshore Renewable Energy Installation (OREI)”.	To mitigate navigational risk	NSVMP

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
Aviation	Creation of an Emergency Response Co-operation Plan (ERCoP) based on the Maritime and Coastguard Agency (MCA) template and site Safety Management Systems (SMS), in consultation with the MCA. Procedures will be followed in the event of an emergency during the construction phase.	To ensure appropriate provisions are in place to facilitate search and rescue operations.	ERCoP
Aviation	During the Operational phase information will be circulated via Notice to Airman (NOTAM) and other appropriate media to ensure information on the construction of the wind farm is promulgated to aviation stakeholders.	To mitigate the risk to aviation stakeholders	NSVMP
Aviation	Prior to operation, information in line with that previously provided to the UKHO will be promulgated to NATS Aeronautical Information Services for inclusion in the UK International Aeronautical Information Package and to the Defence Geographic Centre (DGC) for marking on related aeronautical charts and documentation.	To mitigate the risk to aviation stakeholders	NSVMP
Aviation	During the operational phase, the Project will be lit in line with CAP 393 (CAA, 2017) and CAP 437 (CAA, 2016a), and as agreed with the CAA. A Lighting and Marking Plan will be submitted for approval, to MD-LOT outlining the Projects lighting, and marking strategy to mitigate the risk to aviation safety during operation of the Project.	To mitigate the risk to aviation stakeholders	LMP
Archaeology and Cultural Heritage; Seascape, Landscape and Visual	The final turbine layout will be confirmed post-consent and will be subject to consultation and approval by Marine Scotland Licensing Operation Team (MD-LOT).	To gain MD-LOT approval of the turbine layout.	DSL P
Archaeology and Cultural Heritage	Analysis of pre-construction survey data will be undertaken to refine the identified potential marine archaeology assets at infrastructure locations. Appropriate micro siting allowance for identified assets will be agreed in consultation with HES.	To mitigate the effects on maritime archaeology	WSI & PAD

EIA RECEPTOR	DETAILS OF MITIGATION	PURPOSE / GENERAL DESCRIPTION OF COMMITMENT	RELEVANT CONSENT PLAN(S)
Archaeology and Cultural Heritage	The micro-siting allowance and exclusion zones will be detailed in the Written Scheme of Investigation.	To mitigate the effects on maritime archaeology	DSLIP; WSI & PAD
Archaeology and Cultural Heritage	Turbines will all be of similar dimensions for hub height and blade tip level subject to turbine and substructure design and installation specification;	To mitigate the effects of the Offshore Wind Farm on the setting of cultural heritage receptors.	DSLIP
Archaeology and Cultural Heritage	The Turbines will all be pale grey in colour (Light Grey RAL 7035) with a semi-matt finish.	To mitigate the effects of the Offshore Wind Farm on the setting of cultural heritage receptors.	DSLIP
Archaeology and Cultural Heritage	The design analysis (Annex 1 of Appendix 14.1 to the EIA Report) provides 'design objectives' that will be considered when refining the appearance of the final wind farm layout.	To mitigate the effects of the Offshore Wind Farm on the setting of cultural heritage receptors.	DS
Archaeology and Cultural Heritage	Monitoring and enforcing of AEZs around archaeology and cultural heritage receptors will be maintained throughout construction.	To mitigate the effects on maritime archaeology	WSI & PAD
Other Marine Users	A UXO risk assessment will be carried out prior to construction.	To mitigate the effects on other sea users	Note, UXO survey and clearance undertaken and subject to separate marine licence, overview of process in CMS.

Annex 2 – Construction Phase Marine Pollution Contingency Plan

Annex 3 – Operational Phase Marine Pollution Contingency Plan