



Cambois Connection – Marine Scheme
Volume 5 Appendix 5.1

Outline Environmental Management Plan

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1. Introduction

1.1. Purpose and Scope

This outline Environmental Management Plan (EMP) has been prepared by Berwick Bank Wind Farm Limited (BBWFL), a wholly owned subsidiary of SSE Renewables (SSER) Limited hereafter referred to as 'the Applicant', to support the Environmental Statement (ES) for the Marine Scheme of the Cambois Connection.

As the Marine Scheme extends over both Scottish and English waters, this outline EMP serves as an outline EMP for the Marine Scheme in Scottish waters and an outline EMP for the Marine Scheme in English waters.

This outline EMP constitutes a consolidated document which includes the various environmental commitments during the construction, operation and maintenance, and decommissioning phases of the Marine Scheme, ensuring the efficient management and dissemination of these commitments. It also provides a foundation for the management of the potential environmental impacts associated with the Marine Scheme, providing practical guidance to those involved in the construction, operation and maintenance, and decommissioning phases of the Marine Scheme. It applies to any activities associated with the Marine Scheme up to mean high water springs (MHWS).

An EMP for the Marine Scheme in Scottish and an EMP for the Marine Scheme in English waters (up to mean high water springs) will be developed post-consent for submission prior to construction to the Marine Directorate Licensing Operations Team (MD-LOT) and the Marine Management Organisation (MMO) respectively. The EMPs for Scottish and English waters respectively will be closely coordinated by the Applicant. The EMP for the Marine Scheme in Scottish waters will be closely coordinated with the Berwick Bank Wind Farm (BBWF) EMP.

The outline EMP is a 'live' document and as such it will be further developed post-consent in consultation with regulatory bodies and stakeholders including, but not limited to MD-LOT, the MMO, Natural England and NatureScot, once the consent has been granted

This outline EMP has been developed with respect to feedback provided from consultees as part of the Marine Scheme Scoping Opinions (MD-LOT, 2022; MMO, 2022), where it was highlighted that management plans should be "adequate" to be used as mitigation measures where they are key to reducing impacts.

This outline EMP has been prepared in accordance with the following industry guidance:

- Institute of Environmental Management and Assessment (IEMA) Guidance on Environmental Management Plans (IEMA, 2008).

1.2. Aims and Objectives

The aim of the outline EMP is to provide a tool to set out how the mitigation measures and monitoring commitments made in the Marine Scheme ES are implemented.

The main objectives of this document are therefore to:

- provide information on the Marine Scheme, detailing the appropriate measures for the avoidance, minimisation and control of any environmental impacts associated with the Marine Scheme identified as part of the Marine Scheme ES; and

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- provide a framework for monitoring the effects of the Marine Scheme on the environment.

The EMPs for the Marine Scheme in Scottish and English waters respectively will be finalised and adopted prior to the construction phase of the Marine Scheme and will also be reviewed and updated prior to being adopted for the operation and maintenance phase and similarly for the decommissioning phase. During these updates, further environmental requirements and management measures to be applied during these phases will be incorporated.

1.3. Document Structure

This outline EMP is divided into three parts:

- Part I – Management, implementation and communication. This section provides information on the management and implementation of the EMP, including roles and responsibilities, and lines of communication.
- Part II – Environmental impacts and control measures. This section includes a register of potential environmental impacts identified within the Marine Scheme ES with associated control measures.
- Part III – Annexes included as part of the outline EMP including sub-plans to the outline EMP and reporting proformas. These sub-plans include:
 - Annex 5.1.A – Outline Marine Pollution Contingency and Control Plan (MPCCP);
 - Annex 5.1.B – Outline Invasive Non-Native Species Management Plan (INNSMP);

1.4. Other Relevant Documents

Once finalised, this EMP and its sub-plans (refer to section 1.3) will form part of a suite of consent management plans that will be required as a condition of the Marine Licences for the Marine Scheme. At this stage the list of final consent management plans that will be required is not known. However, where commitments to specific consent management plans have been identified as designed in mitigation within the Marine Scheme ES, outline versions of these plans have been provided as appendices within Volume 5 of the Marine Scheme ES.

These outline consent management plans include:

- Outline Fisheries Management and Mitigation Strategy / Fishing Liaison and Co-existence Plan (FMMS / FLCP) (Volume 5, Appendix 12.2);
- Outline Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD) (Volume 5, Appendix 14.2).

The EMPs based on this outline EMP, sub-plans and all other required consent management plans will be developed once further detailed design work has been completed for the Marine Scheme and post consent requirements and consent conditions are agreed. The consent management plans will be prepared in consultation with key stakeholders for submission to, and approval by, MD-LOT and the MMO prior to the commencement of construction.

The outline consent management plans included in this Marine Scheme ES will be reviewed and updated as necessary throughout the development of the Marine Scheme, to a schedule agreed with MD-LOT and the MMO. These documents will always reflect the commitments made in the Marine Scheme ES and any associated conditions of consent or requirements agreed with the relevant authorities.

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1.5. Consents

Table 1.1 lists the consents obtained for the Marine Scheme. The information in this table will be populated once consents are received.

Table 1-1 Marine Scheme Consents

Licence	Legislation	Provider	Date

2. PART I: MANAGEMENT, IMPLEMENTATION AND COMMUNICATION

2.1. ROLES AND RESPONSIBILITIES

2.1.1. Overview

This section outlines the roles and responsibilities of all the Applicant personnel, Contractors and Subcontractors in relation to this EMP.

The Applicant personnel, Contractors and Subcontractors must comply with the requirements of the final EMP and all relevant associated documents. The key roles relevant to this EMP are described in sections 2.1.2 to 2.1.4.

The key roles with specific roles relating to the EMP are:

- the Applicant Environmental Manager;
- the Applicant Stakeholder Engagement Manager (SEM);
- the Applicant Package Managers;
- the Contractors/Subcontractors Environmental Manager;
- Retained Archaeologist;
- Marine Mammal Observer (if required);
- Company Fisheries Liaison Officer (CFLO);
- Offshore Fisheries Liaison Officer (OFLO) and;
- Marine Coordinator.

These roles will be further defined and agreed with MD-LOT and the MMO prior to the commencement of construction activities.

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2.1.2. The Applicant: Key Management Roles Relating to Environmental Management

The Applicant Environmental Manager

An Environmental Manager appointed by the Applicant will be in place for the construction, operation and maintenance, and decommissioning phases of the Marine Scheme, to manage ongoing compliance with the final EMP and all supporting documents, including those listed in section 1.4. The Applicant's appointed Environmental Manager will have overall responsibility for securing the discharge of consent conditions including managing the delivery of all consent management plans including this EMP and its sub-plans. The Applicant's appointed Environmental Manager will be supported by Package Managers who will be responsible for the engineering work packages covering marine installation and transmission systems during construction. The Package Managers will have similar responsibilities as those of the Applicant Environmental Manager but focussed on their specific package/work streams.

An Environmental Manager, together with a Stakeholder Engagement Manager (SEM), will be appointed by the Applicant and in place throughout the construction, operation and maintenance, and decommissioning phases.

The key responsibilities of the Applicant Environmental Manager may include:

- monitoring compliance of all environmental responsibilities included in the EMP and supporting documents (e.g. consent management plans) are fulfilled for the construction, operation and maintenance, and decommissioning phase of the Marine Scheme;
- monitoring compliance of the Contractors/Subcontractors with the implementation of the EMP and its requirements;
- monitoring compliance with contractual requirements, e.g. environmental management issues are covered in project progress meetings, together with inductions and training; and that any corrective actions arising from environmental audits are addressed; and
- reporting to the Applicant Senior Management Team.

The list of responsibilities for the Applicant's appointed Environmental Manager will be further refined as part of any required updates to this EMP prior to commencement of construction.

The Applicant Stakeholder Engagement Manager

The Applicant SEM will be in position throughout the Marine Scheme to facilitate engagement with the community.

2.1.3. Contractors and Subcontractors

The Contractor and all Subcontractors will be contractually required to comply with the required good environmental practice stated in the Marine Scheme ES, EMP, and associated consent management plans, and ensure their works are fulfilling the stated requirements.

The Contractor, in liaison with the Applicant, will update the EMP as necessary during the construction phase of the Marine Scheme.

A Contractor's Environmental Manager with relevant experience and expertise will be hired by the Contractor throughout each phase of the Marine Scheme. The Contractor's Environmental Manager will verify the correct implementation on the Marine Scheme of the environmental design, control and mitigation measures outlined in the Marine Scheme ES, EMP and supporting consent documentation.

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All of the Applicant’s Contractors and their Subcontractors will ensure that their works are in line with the requirements of the Marine Scheme ES and EMP.

Key responsibilities of the Contractors/Subcontractor include:

- ensuring all environmental responsibilities in relation to the Contractor/Subcontractors included in the EMP and supporting documents are fulfilled for the duration of the Marine Scheme;
- ensuring adequate resources and processes are in place to maintain compliance with the EMP and manage the potential environmental impacts of their activities;
- providing risk assessment method statements (RAMS) addressing the environmental aspects of all planned activities prior to these works commencing. These RAMS will be approved by the Applicant and the Contractor/Subcontractor should provide RAMS for approval at least two weeks prior to commencement of works. RAMS will include proposed mitigation measures required for any work or task to be undertaken;
- implementing required environmental control measures as stated in the Marine Scheme ES, EMP and supporting environmental documentation;
- reading, understanding and complying with any consent conditions related to their activities;
- maintaining regular communication with the Applicant Environmental Manager, principally to report any environmental risks, incidents or queries as a priority;
- providing collated data required by the Applicant Environmental Manager collected from environmental monitoring, together with performing inspections and environmental reporting;
- ensuring sufficient training and induction of all their personnel before the start of any work on the Marine Scheme;
- ensuring the competency of all staff under their supervision and that their tasks are undertaken in line with the EMP; and
- complying with relevant environmental legislation and undertake their duties in line with Marine Scheme environmental policies, plans, procedures and rules for the Marine Scheme.

This EMP will provide the minimum standards for all Contractors and Subcontractors to comply with. Any additional control measure identified during the review of their activities will be specified in Contractor/Subcontractor RAMS.

Contractor’s Environmental Manager

The Contractor’s Environmental Manager will be a full-time position from the start of the Contractor’s contract for the Marine Scheme to ensure compliant implementation of site activities. The Contractor’s Environmental Manager requires an appropriate degree of relevant site experience.

The key responsibilities of the Contractor’s Environmental Manager include:

- ensuring all environmental responsibilities relating to the Contractor’s Environmental Manager, including those in the EMP and supporting documents are fulfilled for the duration of the relevant phases of the Marine Scheme;
- ensuring that sufficient resources and process are available to deliver/comply with the EMP and to manage potential environmental impacts;
- reviewing and regularly refining the EMP and supporting environmental documentation during the construction phase of the Marine Scheme while ensuring consistency of these documents with the Marine Scheme ES. This will include incorporation of any environmental requirements introduced through the consents process. Any revisions to the EMP or supporting environmental documentation require approval by the Applicant Environmental Manager;

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- undertaking environmental audits, inspections and reporting to ensure the construction activities adhere to the Marine Scheme ES, EMP and any supporting environmental documentation;
- collating and conducting an environmental monitoring programme and collating relevant environmental reports and records. All reports, records and monitoring programme require the approval of the Applicant Environmental Manager;
- promoting a positive environmental culture via training and engagement with site management and site operatives, and promoting increased environmental awareness;
- ensuring timeous remediation/reporting relating to any environmental incidents/non-compliance;
- communicating statutory requirements and good environmental practices stated in the EMP by planning toolbox talks. These should be based on-site activities and updated to reflect any reports of non-compliance. These responsibilities should be communicated to all relevant Contractors/Subcontractors outlined in this EMP;
- supervising and monitoring the implementation of, and ongoing compliance with the EMP;
- advising Contractors and Subcontractors on compliance with the EMP; and
- introducing site staff to the environmental policy, procedures and requirements of the EMP.

2.1.4. Supporting Environmental Roles

Retained Archaeologist

The Retained Archaeologist will be in post throughout the construction phase, and, if required, during the operation and maintenance, and the decommissioning phases, and will be the primary person that the Applicant Environmental Manager will contact relating to archaeological matters. The primary responsibilities associated with the Retained Archaeologist are outlined in the outline WSI and PAD (within Volume 5, Appendix 14.2). As noted in the outline WSI and PAD, the Retained Archaeologist may be supported by Archaeological Contractor(s) to carry out specific packages of work, if required (refer to Volume 5, Appendix 14.2).

Marine Mammal Observer

A Marine Mammal Observer may be in post throughout noisy activities during the construction period if required in accordance with consent conditions. These periods and the roles and responsibilities associated with the potential requirement for a Marine Mammal Observer will be agreed by the Applicant with MD-LOT / MMO. In addition, a Passive Acoustic Monitoring operator/Acoustic Deterrent Device operator may also be in place, if required in accordance with consent conditions. Their roles and responsibilities would also be agreed by the Applicant with MD-LOT / MMO.

Company Fisheries Liaison Officer

The Applicant has already appointed a Company Fisheries Liaison Officer (CFLO) who will be maintained for the Marine Scheme during pre-construction, construction and as required during critical phases of the Marine Scheme. The primary responsibilities of the CFLO are set out in the outline Fisheries Coexistence and Liaison Plan (FCLP) and outline Fisheries Mitigation and Management Plan (FMMS) (Volume 5, Appendix 12.2).

Offshore Fisheries Liaison Officer

OFLOs will be appointed onboard survey and construction vessels to communicate with fisheries stakeholders at sea where this is deemed to be required. The primary responsibilities of the OFLO are set out in the outline Fisheries Coexistence and Liaison Plan (FCLP) and outline Fisheries Mitigation and Management Plan (FMMS) (Volume 5, Appendix 12.2).

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Marine Coordinator

A Marine Coordinator will be in place for the Marine Scheme. The primary responsibility of the Marine Coordinator will be the coordination of day-to-day vessel activity associated with the Marine Scheme.

Some of the main duties of the Marine Coordinator in relation to the EMP include:

- coordinating daily activities of vessels on the Marine Scheme;
- supporting the fulfilment of the requirements outlined in the EMP and relevant Consent Management Plans particularly regarding:
 - informing and advising other vessels working in the area of a potential archaeological discovery;
 - assisting in the coordination and execution of the planned response to a pollution incident from a vessel or vessel associated activity and keeping the Applicant informed (see Annex 5.1.A). Key roles that will be kept informed will be the Applicant Project Manager, the Applicant Environmental Manager and relevant Contractors/Subcontractors; and
 - supervising the planned response and any clean-up operation required in the event of a spill originating from an installation of the Marine Scheme (see annex A).

As the Marine Scheme and BBWF are both being progressed by the Applicant, it is expected that both developments will be jointly coordinated using the same Marine Coordination Centre (MCC) for all phases of each development. This allows for potential cumulative effects between these developments to be managed through coordination. The MCC will be established by the Applicant prior to commencement of the construction phase.

2.1.5. Contact Details

A Marine Scheme Contacts Sheet will be compiled prior to the commencement of construction at the Marine Scheme. This list will include contact details of all Applicant, Contractor/Subcontractor and relevant third parties. This list will be made available to the Marine Scheme Team and will be regularly updated throughout the construction, operation and maintenance, and decommissioning phases.

The complete list of contacts will be provided in the Contacts Sheet.

As a minimum, the Contacts Sheet will include the following information:

- company/organisation;
- position;
- name;
- telephone/mobile number;
- email address; and
- office location.

2.2. Communications and Reporting

Regular progress meetings will be held before and during construction, operation and maintenance, and decommissioning activities, between the Applicant Environmental Manager and relevant Contractors/Subcontractors. During these progress meetings, the Applicant Environmental Manager and/or Contractor's Environmental Manager will present a section on environmental management and consents compliance.

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Contractor/Subcontractor RAMS will be reviewed and copies of the relevant consents will be provided to the Contractors and/or Subcontractors and they will be made aware of the consent obligations associated with a particular activity.

All Applicant personnel, Contractors and Subcontractors should report any environmental concerns or issues immediately. A Safety and Environmental Awareness Report (SEAR) will be completed for all potential (near miss) or actual environmental incidents or emergencies which occur on-site.

2.3. External Communications

External communications, notifications and reporting including any environmental incidents in relation to the Marine Scheme activities will be carried out in accordance with the commitments included in the Marine Scheme ES and the requirements of the consent conditions.

2.3.1. Incident Reporting

Environmental incidents

The procedures to report spill or pollution events or biosecurity incidents are provided in the outline MPCCP and outline INNSMP (Annex 5.1.A and Annex 5.1.B to this outline EMP).

The procedures to carry out following an environmental incident (excluding marine pollution incidents, which are addressed in the MPCCP) will be provided in the Environmental Incident Reporting Procedure which will be produced, approved and annexed to this EMP prior to the start of the construction activities.

2.3.2. Dropped Objects

All dropped objects should be report to the Applicant. Any deemed to be a hazard to safe navigation by the Applicant, Contractors or Subcontractors will need to be recorded and reported to MD-LOT via the Marine Scotland – DROPOB1 - Offshore Wind & Marine Renewables Dropped Objects Form.

2.4. Training, Auditing and Change Management

2.4.1. Competence, Training and Change Management

Contractors and Subcontractors will ensure that they have adequate environmental management resources and procedures in place for the duration of the Marine Scheme's scope of works that they are contracted to undertake. To monitor adherence to the EMP and environmental and consents requirements all Contractors associated documentation will be reviewed by the Applicant.

The Contractor's Environmental Manager will be responsible for providing environmental training and promoting awareness regarding environmental management using various means such as:

- inductions;
- toolbox talks; and
- awareness materials.

Further information on these means is included in Table 2.1.

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Table 2-1 Methods of Environmental Training and Promoting Environmental Awareness

Means to Deliver Environmental Training and Promote Environmental Awareness	
<p>Induction</p>	<p>Environmental induction training will be presented to all personnel working and visiting the site (the Applicant personnel, Contractor/Subcontractor employees, suppliers and other visitors) to inform them of the content of the EMP that is applicable to them:</p> <p>The following details, as a minimum, will be provided to all inductees:</p> <ul style="list-style-type: none"> - description of the specific environmental risks relevant to the inductees’ work onsite; - description of the main environmental aspects of concern at the site; - species and/or habitat protection requirements; - archaeological safeguarding measures; - pollution prevention measures; - waste management measures; and - plant service and repair procedures. <p>An Environmental Constraints Map, based on survey data collected during the planning and pre-commencement phases, showing constraints by environmental sensitivities will be provided to the Contractor and updated as required.</p> <p>The Contractor will produce an Environmental Risk Map to be used during induction and displayed on-site and update the Environmental Risk Map, when necessary, following consultation with the Applicant Environmental Manager. A toolbox talk will follow any update to clarify the changes and offer discussion opportunities. The Environmental Risk Map will be based on the Environmental Constraints Map and will illustrate the sensitive areas and potential sources of pollution.</p>
<p>Toolbox talks</p>	<p>Regular toolbox talks and training will be delivered by specialist staff on-site to discuss any update to the EMP relevant to the personnel on-site together with environmental issues arising on-site to provide ongoing training and reinforce environmental awareness.</p> <p>The toolbox talks will be scheduled appropriately in advance before the beginning of the construction activities and will be in line with the programme of construction and operation and maintenance phases’ activities. In the case of non-compliance with the EMP or unforeseen circumstances, additional toolbox talks and training will be scheduled.</p> <p>The Contractor will maintain a record of all the toolbox talks and training delivered and provide it to the Applicant Environmental Manager when requested.</p> <p>The following environmental training, as a minimum, will be provided:</p> <p>training on the use of spill kits (onboard vessels and in water), on a regular basis (e.g. to account for staff/Subcontractor changes).</p> <p>Additional toolbox training may include:</p> <ul style="list-style-type: none"> - waste management, including waste storage, waste segregation and littering; - control of fuel and refuelling, and fuel handling procedures; and - ecologically and archaeologically sensitive areas.
<p>Awareness materials</p>	<p>Environmental notice board(s) will be prominently displayed to permit all personnel to be able to review a notice board on a daily basis. One notice board will be positioned in every vessel congregation area as a minimum.</p> <p>The environmental notice board will be maintained by the Contractor and updated when required (at least monthly) throughout the construction phase.</p>

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Means to Deliver Environmental Training and Promote Environmental Awareness

The following information, as a minimum, will be provided on the notice boards:

- description of the key environmental risks alongside the risk mitigation measures;
- the Environmental Constraints/Risk Map illustrating the location of the environmental sensitivities and the required zones of exclusion;
- location of emergency response equipment; and
- key contact numbers and responsible personnel.

To promote good environmental practice and to inform all personnel on-site, environmental labels and signs will be used across the site.

The Contractor’s Environmental Manager will ensure that environment and consents issues, highlighting the key environmental sensitivities and considerations, are covered in a dedicated section within wider Contractor inductions for the Marine Scheme. All the Applicant staff, Contractors and Subcontractors will receive a Marine Scheme induction, where relevant.

Specific training on the purpose, requirements and procedures of the EMP and its related annexes will be delivered in toolbox talks by the Contractor’s Environmental Manager. Toolbox talks will be prepared to communicate clearly and concisely the key points to the Marine Scheme staff (as advised by IEMA, 2008). Toolbox talks prior to specific activities taking place during the construction, operation and maintenance, and decommissioning phases to identify specific control measures and mitigation requirements, will also be undertaken.

The Contractor’s Environmental Manager will provide awareness materials in various forms, likely to include among others, training packs, posters, signs and newsletters.

In order to update relevant personnel (including new staff) with any revisions in the requirements or procedures, training will be carried out regularly for the duration of the Marine Scheme and the Contractor’s Environmental Manager will keep a record of the training provided.

The Applicant Environmental Manager will be responsible, directly or by contractually requiring a Contractor, for the promotion of awareness and environmental training to the relevant personnel during the operation and maintenance phase of the Marine Scheme.

2.4.2. Monitoring and Audits

The Commitments Register will be the principal tool available for setting out the compliance with consent conditions and mitigation commitments. The Commitments Register will contain all the commitments (e.g. mitigation measures and monitoring measures) included in the Marine Scheme ES and the phase/duration over which they apply.

The Commitments Register will also provide a track and audit trail of compliance throughout the construction and operation and maintenance phases of the Marine Scheme.

The Commitments Register will be prepared and approved in advance of the construction phase. The Commitments Register will be maintained throughout the construction phase of the Marine Scheme. Similarly, prior and during the operation and maintenance phase as well as the decommissioning phase, the Commitments Register will be updated, reviewed and maintained.

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Compliance with the EMP will be monitored through a series of audits during the construction, operation and maintenance, and decommissioning phases of the Marine Scheme. An audit will be scheduled to ensure the requirements and procedures communicated in inductions and toolbox talks have been understood by undertaking, for instance, site visits and conversations with relevant personnel to monitor awareness. Checklists, informed by review of the EMP and Contractor RAMS, will be prepared. These will be used to facilitate the audit process.

The following environmental audits may be completed:

- at least one per quarter during construction, as required under the conditions of the consents;
- on a monthly basis during construction. These will be undertaken by the Contractor’s Environmental Manager and a record of all completed audit forms, and records of corrective action and close outs will be maintained and provided to the Applicant Environmental Manager;
- during construction, audits of Subcontractors on a quarterly basis to be undertaken by the Contractor’s Environmental Manager. Audit reports will be provided to both the Contractor and the Applicant within two weeks of the audit being undertaken; and
- environmental inspections will be undertaken weekly during construction by the Contractor’s Environmental Manager and all relevant records will be delivered to the Applicant when and as requested.

A record of all the details and findings arising from monitoring and audit activities will be maintained and any observation or corrective actions will be addressed, with procedures revised in the EMP as required. These will be submitted to the Applicant for approval prior to implementation.

2.4.3. Review and Change Management

The EMP will be reviewed at regular intervals throughout the construction, operation and maintenance, and decommissioning phases of the Marine Scheme. The Applicant will contractually require Contractors’ and Subcontractors’ Environmental Managers to comply with the EMP. All updates to the EMP made by the Contractor require the review and approval of the Applicant.

The EMP will be reviewed at regular intervals or when any important new information, methods, procedures or good environmental practice become available. The schedule for reviews will be agreed with MD-LOT and the MMO post-application. The EMP will also be revised following any findings or lessons learned during the construction, operation and maintenance and/or decommissioning phases.

In the event of a new environmental sensitivity being identified during works, change management procedure will be followed by the Contractor’s Environmental Manager (as recommended in IEMA, 2008). An assessment of potential impacts will be initiated by the Contractor’s Environmental Manager following the notification of a change and if necessary, the EMP will be updated and submitted to MD-LOT and the MMO for approval. Every change to the EMP will be recorded as part of the EMP review audit trail, and this will include details of the review undertaken.

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3. Part II: Environmental Impacts and Control Measures

3.1. Environmental Impacts and Control Measures

In this section of the EMP, commitments stated in the Marine Scheme ES will be translated into an appropriate format allowing their practical implementation by Contractors and Subcontractors. This follows IEMA's Practitioner Guide, which states that "the overall objective of an EMP is to provide a continuous link or 'bridge' between the design phase of a Marine Scheme, conditions attached to consents, Marine Scheme construction, and into the operational phase" (IEMA, 2008).

The complete list of enhancement, mitigation and monitoring commitments is provided in Volume 2, Chapter 16 as a Summary of Mitigation Measures and Commitments. This, serving as the Commitments Register, will support compliance with the consents awarded for the Marine Scheme in relation to environmental considerations. It is developed from the commitments made within the Marine Scheme ES and in compliance with consent conditions, adherence to the EMP and accompanying annexes.

3.2. Management of Key Environmental Aspects and Compliance Obligations

3.2.1. Marine Species

In the event of a wildlife incident occurring as a result of an activity associated with the Marine Scheme (e.g. injury to a marine mammal, or an observed fish or bird mortality), the incident will be reported to the Applicant Environmental Manager as soon as possible. Details of the activity being undertaken, including pictures and weather conditions where relevant and applicable, is the minimum information to be provided. The Applicant Environment Manager will follow up with the relevant regulatory authority, where appropriate.

3.2.2. Marine Archaeology

The procedures to be followed on discovering any marine archaeology during the construction and operation and maintenance phases of the Marine Scheme are set out in the WSI and PAD (Volume 5, Appendix 14.2).

3.2.3. Other Sea Users

The approach to management and mitigation of potential impacts on other sea users is described in Volume 2, Chapter 15: Other Sea Users and specific measures included in Volume 2, Chapter 16: Summary of Mitigation Measures and Commitments.

Some of the specific measures adopted are:

- promulgation of information (such as position and nature of works, vessel routes, Safety Zones, advisory safe passing distances, navigational warnings) to other marine users as required via Kingfisher Bulletins;
- a clear process of marine coordination of all vessels and vessel activity;
- appropriate marking and lighting of vessels;

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- appropriate marking and lighting of the Marine Scheme; and
- vessel transit planning, commercial fisheries relations and management of commercial fisheries interactions.

3.2.4. Marine Pollution Prevention and Contingency Planning

The measures to be adopted to minimise the impacts from the accidental release of pollutants during construction, operation and maintenance, and decommissioning phases of the Marine Scheme are set out in the outline MPCCP (Volume 5, Annex 5.1.A to this outline EMP).

3.2.5. Invasive Non-native Species

The measures to be adopted for the management of marine invasive non-native species during the construction, operation and maintenance, and decommissioning phases of the Marine Scheme are set out in the outline INNSMP (Volume 5, Annex 5.1.B to this outline EMP).

3.2.6. Waste Management

A Waste Management Plan (WMP) is required by all Contractors and Subcontractors setting out details of all waste management procedures for their activities and details of expected waste arisings and following procedures for waste management. The following aspects are expected to be a minimum requirement for the WMP:

- analysis of the waste arisings/material surpluses;
- specific waste management objectives for the Marine Scheme;
- methods proposed for prevention, reuse and recycling of wastes;
- material handling procedures; and
- proposals for education of workforce and plan dissemination programme.

Some of the key responsibilities of the Contractors and Subcontractors addressed in the WMP are expected to include:

- complying with all relevant legislative and Marine Scheme ES requirements and seeking mandatory permits and licences regarding waste management;
- providing a waste reduction toolbox talk to all personnel to increase awareness of recycling and waste reduction, and make sure the requirements of the WMP are understood;
- handling waste materials and refuses to limit the damage and disturbance as much as practicable;
- sorting all waste in their specific suitably labelled secure container;
- checking the contents of the site waste and recycling containers on a weekly basis;
- reducing waste through reduction, recycling or waste elimination measures when feasible;
- storing and returning all relevant waste to shore and disposing of it according to the legal waste management framework; and
- agreeing with the principles of the Basel Convention of 1989 to avoid hazardous waste being unfairly exported to developing countries.

The WMP must be provided to the Applicant for approval by MD-LOT and the MMO prior to commencement of the activities.

The WMP will be maintained and updated where relevant for the operation and maintenance, and decommissioning phases of the Marine Scheme.

	Outline Environmental Management Plan	
Classification: Final		Rev: A01
Status: Final		

4. References

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Scottish Government, (2022). The Energy Act 2004 *Decommissioning of Offshore Installations and Decommissioning of Offshore Renewable Energy Installations in Scottish waters*