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Marine Non Native Species Plan

LTooooo9 - Shetland HVDC Link

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Marine Non-Native Species Plan

LT000009 - Shetland HVDC Link

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Glossary

Abbreviations

Abbreviation	Description
AFS	Anti-Fouling System
BWM	Ballast Water Management
CEMP	Construction Environmental Management Plan
EU	European Union
GB	Great Britain
gt	Gross tonnes
HVDC	High Voltage Direct Current
IMO	International Maritime Organization
JNCC	Joint Nature Conservation Committee
km	Kilometre
MEPC	Marine Environmental Protection Committee
MNNS	Marine Non-Native Species
MW	Megawatt
NAFC	North Atlantic Fisheries College
NKT	NKT HV Cables
NM	Nautical miles
PPE	Personal Protection Equipment
pSPA	Proposed Special Protection Area
ROV	Remotely Operated Vehicle

SHE Transmission	Scottish Hydro Electric Transmission Plc
SNH	NatureScot, formerly Scottish Natural Heritage
SOPEP	Shipboard Oil Pollution Emergency Plan
UK	United Kingdom

1 Introduction

Shetland is not presently connected to the UK mainland electricity Transmission grid and as such is solely reliant on island-based generation, this generation is in the majority derived from fossil fuels with the support of onshore wind.

There is currently approximately 600 MW of consented renewable energy generation on the Shetland Isles, which will require connection to the UK mainland transmission network once these projects are constructed. Scottish Hydro Electric Transmission Plc (SHE Transmission) is the licenced Transmission Owner in the north of Scotland, and as such, has a requirement to provide connection to the UK's network when requested by a generator.

In order to meet the dual requirement of the provision of reliable transmission level supply and export surplus renewable generation, SHE Transmission are planning to install a single circuit 253 km long, 600 MW High Voltage Direct Current (HVDC) link between Weisdale Voe in Shetland and Noss Head in Caithness ('Shetland HVDC Link' or 'the Project'). The marine cable infrastructure will consist of a single bundle comprising two conductor cables and one fibre optic communications cable, to allow control of the substation and HVDC converter station. Marine cable solution provider, NKT, will be responsible for the manufacture and installation of the subsea cable.

The project has been awarded the following licences:

- Marine Works Licence number 2020/011/WL was awarded by Shetland Islands Council in June 2020 and applies to Weisdale Voe out to 12 nautical miles (NM) from the Shetland Islands;
- Marine Licence number 07203/20/0 was awarded by Marine Scotland's Licensing Operations Team in July 2020 and applies to waters within 12 NM; and
- Marine Licence number 07357/20/0 was awarded by Marine Scotland's Licensing Operations Team in July 2020 and applies to waters outwith 12 NM.

This Marine Non-Native Species (MNNS) plan relating to the marine cable installation works to be carried out as part of the Shetland HVDC Link is submitted to Marine Scotland and the Shetland Islands Council to discharge:

- Condition 8 of the Shetland Islands Council Marine Works Licence 2020/011/WL;
- Condition 19 (a) of the Marine Licence number 07203/20/0; and
- Condition 18 (a) of the Marine Licence number 07357/20/0.

Table 1.1 below sets out the details of these conditions and how they are addressed, with more detail on the structure of the document provided in Table 1.2.

Table 1.1: Relevant licence conditions

Relevant Licence Condition	Relevance to this Plan
Shetland Islands Council Marine Works Licence 2020/011/WL (8.) Prior to works commencing a Construction Environment Management Plan (CEMP), Emergency Spill Response Plan, Control measures and shipboard oil pollution emergency plan (SOPEP), Marine Non-Native Species (MNNS) will be submitted to the Planning Authority and agreed in writing. The Planning Authority will consult Scottish Natural Heritage for advice before any submission is approved. Reason: To protect bird species from pollution and the integrity of the Seas off Foula Proposed Special Protection Area (pSPA). To also protect other wildlife and the environment that may be impacted.	Provision of Marine Non-Native Species (MNNS) plan addressed through provision of this document
Marine Licence 07203/20/0 19. The licensee must submit a Construction Environmental Management Plan (“CEMP”) to the licensing authority for its written approval at least two months prior to commencement of the works, or less if agreed by the licensing authority. The CEMP must be consistent with the marine licence application and supporting documents and must contain, but not be limited to, the following: a) Mitigation and management measures outlined in Section 15 and Table 6.2, within the Shetland HVDC Link Marine Environmental Appraisal (Document Number: A-200409- S00-REPT-003), Version A02, submitted to the licensing authority on 12 December 2019.	Shetland HVDC Link Marine Environmental Appraisal specified that a Marine Non-Native Species plan would be produced.
Marine Licence 07357/20/0. 18. The licensee must submit a Construction Environmental Management Plan (“CEMP”) to the licensing authority for its written approval at least two months prior to commencement of the works, or less if agreed by the licensing authority. The CEMP must be consistent with the marine licence application and supporting documents and must contain, but not be limited to, the following: a) Mitigation and management measures outlined in Section 15 and Table 6.2, within the Shetland HVDC Link Marine Environmental Appraisal (Document Number: A-200409- S00-REPT-003), Version A02, submitted to the licensing authority on 12 December 2019.	Shetland HVDC Link Marine Environmental Appraisal specified that a Marine Non-Native Species plan would be produced.

Table 1.2: Structure of the document highlighting where specific requirements of the licences are met

Section of this Document		Contains information on:	Addresses Requirement
Section 1	Introduction	Purpose of the document	2020/011/WL (8) 07203/20/0 (19:a) 07357/20/0. (18.a)
Section 2	Background and Legislative Context	Information on relevant legislation	
Section 3	Presence of MNNS in the project area	Summary of known MNNS present in the vicinity of the project	
Section 4	Potential Pathways for Introduction	Summary of most common pathways for introduction or transmission of MNNS	
Section 5	Biosecurity Measures	Those measures the project will undertake to reduce the risk of translocating MNNS to as low as reasonably practicable	
Section 6	Compliance and Reporting	How compliance of project vessels will be determined and any records of MNNS reported	

2 Background and Legislative Context

Marine non-native species (MNNS) present a biosecurity threat as they can out-compete native species for resources to the exclusion of native flora and fauna, can predate on natural species, threaten natural features, ecosystems, or established businesses (e.g. fisheries and aquaculture), and through boring and biofouling can interfere with manmade structures.

2.1 Legal Requirement

MNNS damage our environment and it is an offence to release or cause to spread, any non-native plant or animal species outside of its native range¹, including through accidental transfer. Offences can apply when poor management practices allow non-native plants or animals to be introduced or spread within the marine environment through, for example, site operation or construction work. Knowledge of the offence, recklessness, intention, or negligence does not have to be proven in these cases, hence the need for suitable planning and prevention measures. The legislation and guidelines set out in Table 1.1 are relevant to the control of invasive non-native species.

Table 1.1: Legislation or guidelines relating to management measures of invasive non-native species

Legislation / Guidelines	Summary	Relevant requirement
International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM) – adopted 2004	Objective to prevent, minimise and ultimately eliminate the transfer of harmful aquatic organisms and pathogens through control and management of ships' ballast water and sediments. Under this Convention, all ships of 400 gross tonnes (gt) and above will be required to have on board an approved Ballast Water Management Plan and a Ballast Water Record Book, and to be surveyed and issued with an International Ballast Water Management Certificate.	Ballast Water Exchange Management Plan
Resolution MEPC.207(62) 2011 Guidelines For The Control And Management Of Ships Biofouling To Minimize The Transfer Of Invasive Aquatic Species	The Guidelines are intended to provide useful recommendations on general measures to minimize the risks associated with biofouling for all types of ships.	General guidance on minimising biofouling risks

Production of this MNNS plan is in accordance with the draft Shetland Islands Regional Marine Plan (2019)² and Scotland's National Marine Plan (2015)³, and draws on the NatureScot (formerly SNH) Marine Biosecurity Planning guidance⁴ and the Shetland Island Biosecurity plan (2015)⁵.

¹ Legislation.gov.uk 2017. Wildlife And Countryside Act 1981.

² <https://www.nafc.uhi.ac.uk/t4-media/one-web/nafc/research/document/marine-spatial-planning/sirmp/Shetland-Islands-DRAFT-Regional-Marine-Plan-2019.pdf>

³ <https://www.gov.scot/publications/scotlands-national-marine-plan/>

⁴ <https://www.nature.scot/sites/default/files/2019-02/Marine%20Biosecurity%20Planning.pdf>

⁵ <https://www.nafc.uhi.ac.uk/t4-media/one-web/nafc/research/document/marine-spatial-planning/biosecurity-plan.pdf>

3 Presence of MNNS in the Project Area

Presence of MNNS varies between the Caithness/Moray region and the Shetland Islands (Table 2.1). Of the known MNNS in the vicinity of the project, only one is considered to be an alert species by the GB Non-Native Species Secretariat, the American Lobster⁶. The only other marine alert species currently listed (as of December 2020) is the Japanese oyster drill (*Ocenebra inornata*), though no records for this species are present in the project area.

Table 3.1: MNNS Present in the vicinity of the route (Payne *et al.*, 2014⁷; Nall *et al.*, 2015⁸, NAFC⁹ and the GB Non-Native Species Secretariat¹⁰).

Taxon	Non-Native Invasive Species	Latin name	Presence in Area	
			Shetland Islands	Caithness/Moray
Crustacea	American Lobster	<i>Homarus americanus</i>	x	
	Japanese Skeleton Shrimp	<i>Caprella mutica</i>	x	x
	Acorn barnacle	<i>Austrominius modestus</i>		x
Mollusca	Pacific Oyster	<i>Crassostrea gigas</i>	x	
	Flat Top Shell	<i>Gibbula umbilicalis</i>	x	
	Purple Sea Urchin	<i>Paracentrotus lividus</i>	x	
	Soft shelled clam	<i>Mya arenaria</i>		x
Ascidians	Leathery Sea Squirt	<i>Styela clava</i>	x	
	Carpet Sea Squirt	<i>Didemnum vexillum</i>	x	
	Orange-Tipped Sea Squirt	<i>Corella eumyota</i>	x	x
Cnidaria	Orange-Striped Anemone	<i>Diadumene lineata</i>	x	
	Snakelocks Anemone	<i>Anemonia viridis</i>	x	
Bryozoa	Invasive Bryozoan	<i>Schizoporella japonica</i>	x	x
	Red Ripple Bryozoan	<i>Watersipora subtorquata</i>	x	
Algae	Rainbow Wrack	<i>Cystoseira tamariscifolia</i>	x	
	Asian Red Algae	<i>Neosiphonia harveyi</i>		x
	Wireweed	<i>Sargassum muticum</i>	x	
	Red seaweed	<i>Dasysiphonia japonica</i>		x
	Red seaweeds	<i>Bonnemaisonia hamifera</i>		x
	Seaweed	<i>Codium fragile</i>		x

⁶ <http://www.nonnativespecies.org/index.cfm?sectionid=81>

⁷ Payne, R.D., Cook, E.J. and Macleod, A. (2014). Marine Biosecurity Planning – Guidance for producing site and operation-based plans for preventing the introduction of non-native species. Report by SRSL Ltd. in conjunction with Robin Payne to the Firth of Clyde Forum and Scottish Natural Heritage 39 pp. <https://www.nature.scot/sites/default/files/2019-02/Marine%20Biosecurity%20Planning.pdf>

⁸ Nall, Chris & Guerin, Andrew & Cottier-Cook, Elizabeth. (2015). Rapid assessment of marine non-native species in northern Scotland and a synthesis of existing Scottish records. Aquatic Invasions. 10. 107-121.

⁹ <https://www.nafc.uhi.ac.uk/research/marine-spatial-planning/non-native-species-and-biosecurity-planning/non-native-species-in-shetland>

¹⁰ <http://www.nonnativespecies.org/home/index.cfm>

4 Potential Pathways for Introduction

MNNS may be translocated during offshore projects through the accidental release of untreated ballast water; use of contaminated (i.e. biofouled) machinery and vessels; or through placement of contaminated material. The potential for spread of MNNS from Project activities is recognised due to the nature of vessel movements and the likely suitability of habitats. Mitigation measures designed to reduce the introduction of new MNNS will also mitigate the potential for spread of extant MNNS.

Further details on these potential routes of introduction are provided below in relation to Project specific activities.

4.1 Ballast Water Release

Ballast water associated with maritime activity is responsible for the majority of accidental marine translocations globally (Barry, *et al.*, 2008). It is estimated that at least 7,000 different species are being carried in ships' ballast tanks around the world. Studies carried out in several countries indicate that many species of bacteria, plants, and animals can survive in a viable form in the ballast water and sediment carried in ships, even after journeys of several months' duration. Over a quarter of non-native marine species in British waters may have been introduced through exchange of ballast water, either in ballast water itself or in sediments transported in ballast tanks (JNCC, 1997).

Discharging of untreated ballast water or sediment into geographically different regions may result in the establishment of harmful aquatic organisms and pathogens, with potential to threaten animal and plant life. Although other media have been identified as being responsible for transferring organisms between geographically separated water bodies, ballast water discharge from ships appears to be among the most prominent.

This potential path for introduction is applicable to the Project as vessels will require the use of ballast water to control vessel trim, list, draught and general vessel stability, in order to maintain safe operating conditions during the installation of the Shetland HVDC Link. A number of vessels carrying ballast water will enter UK (Scottish) waters from international European Union (EU) waters.

4.2 Fouling of Hulls and Machinery / Equipment

Alongside ballast water, hull fouling is considered to be one of the key vectors of accidental translocation of marine organisms around the world. This is particularly a risk with slow moving vessels. Once submerged in the marine environment, any exposed surface will become colonised, initially by a film of microorganisms such as bacteria, which subsequently facilitates the settlement of macro organisms such as barnacles, seaweeds, encrusting bryozoans, molluscs, etc. Fouling can have detrimental effects both economically and environmentally as fouling of ships hulls can lead to increased drag, therefore increased vessel fuel costs, and improper or accidental removal of the bio foul layer can lead to release of non-native flora and fauna.

In addition to ships hulls, associated machinery and equipment, such as anchors or remotely operated vehicles (ROV's) can become fouled and, if not properly cleaned or dried between re-deployments, can also result in the translocation of marine organisms.

This potential path for introduction is applicable to the Project as a number of vessels will enter UK (Scottish) waters from international (EU) waters. Furthermore, equipment such as ROVs and cable installation tools will be required to carry out the offshore works.

4.3 Materials

Subsea cables can be protected in situ by placement of materials such as rock armour or concrete mattresses. The placement of these materials is recognised as a potential route for introduction of non-native species if they are transferred from a marine environment, and have not been decontaminated prior to placement in another marine location. Factory made concrete mattresses and quarried rock armour however cannot act as a source of non-native/invasive species as they are devoid of marine life prior to placement.

This potential path for introduction is not applicable to the Project as only clean rock or manufactured cable protection systems will be placed along the cable route. Therefore, there will be no prior contamination of material before it enters UK waters.

5 Biosecurity Measures

The management of biosecurity focuses on three key areas:

- Ballast water management;
- Antifouling management; and
- Equipment management.

NKT and their subcontractors shall comply with the relevant requirements set out in the following sections and maintain suitable documentary evidence.

5.1 Ballast Water Management

Vessels contracted to work on the Project are required to follow the relevant parts of current international legislation on ballast water management, namely those set out in:

- The International Convention for the Control and Management of Ships' Ballast Water and Sediments (the Ballast Water Management (BWM) Convention)

Specific measures required under the above are:

- A requirement for relevant vessels to undertake the management of ballast water in accordance with an approved Ballast Water Management Plan, with records of such management retained in a Ballast Water Record Book in accordance with the provisions of the Convention; and
- A requirement to ensure, where possible, that ballast water management meets the ballast water performance standards (i.e. D-1 or D-2) as detailed in the BWM Convention.

The Ballast Water Management Plans and Record Books of relevant vessels will be made available to NKT's environmental manager as early as possible to determine compliance.

In addition, in line with the Shetland Biosecurity plan, vessels should, where practical, conduct mid-ocean ballast water exchange prior to entering and after leaving Shetland Island waters.

5.2 Hull Anti-Fouling Management

Vessels contracted to work on the project will be required to follow current UK legislation and relevant parts of UK and IMO guidance on the use of hull Anti-Fouling Systems (AFS's). These include:

- Maritime and Coastguard Agency MGN 398 (M+F): Merchant Shipping (AFS) Regulations 2009; and
- The Guidelines for the control and management of ships' biofouling to minimize the transfer of invasive aquatic species (Biofouling Guidelines) (resolution MEPC.207(62)).

Specific measures required under the above conventions and guidelines require:

- All vessels of 400 gross tonnage (gt) and above to be in possession of a current international AFS certificate;
- All vessels of 24 m or more in length (but less than 400 gt) to carry a declaration on AFS signed by the owner or authorised agent accompanied by appropriate documentation; and
- All ship hull inspections and biofouling management measures be documented and where applicable, recorded in the Planned Maintenance System.

All relevant certificates, declarations and other documentation should be provided to NKT's Environmental Manager as early as possible to determine compliance.

In addition, and particularly for smaller vessels (i.e. less than 24m in length), any fouling on vessel hulls which is visible from observation made from the surface/quayside at a level 4 or above on the recognised hull fouling scale (Table 5.1) will not be permitted access to the work site. Visible hull fouling will be checked as part of the vessel inspection process (by environmental manager or nominated deputy) conducted prior to a vessel's mobilisation to site. This is a precautionary approach based on the guidance contained within the Biosecurity Plan for the Shetland Islands (Collin et al., 2015¹¹), which recommends that vessels with very heavy fouling (Level 5, Table 5.1) be required to be cleaned, while vessels exhibiting Level 3 or 4 (moderate to heavy) fouling require no action, though manual removal of larger organisms where possible is recommended.

Table 5.1: visible hull fouling scale (Payne et al., 2014⁷; Colin et al., 2015¹¹)

Rank	Description	Visual estimate of fouling cover
0	No visible fouling. Hull entirely clean, no biofilm on visible submerged parts of the hull.	0
1	Slime fouling only. Hull partially or entirely covered in biofilm, but absence of any plants or animals.	0
2	Light fouling. Hull covered in biofilm and one to two very small patches of one species of plant or animal.	1 to 5 % of submerged surfaces
3	Moderate fouling. Presence of biofilm and patches of clearly visible fouling assemblages, consisting of one or more species of plants and/or animals.	6 to 15 % of submerged surfaces
4	Heavy fouling. Abundant fouling assemblages consisting of multiple species of plants and/or animals.	16 to 40 % of submerged surfaces
5	Very heavy fouling. Many different species of plants and/or animals covering most of hull surface.	41 to 100 % of submerged surfaces

5.3 Equipment Management

5.3.1 Vessel based works

All marine contractors working on the project shall ensure that all equipment for use in the marine environment (e.g. ROV's, trenching tools, etc.) arrives on the project clean (i.e. free from marine debris and sediment) and having had sufficient time in air to allow drying.

This will be evaluated through the vessel inspection and audit process, and equipment will be inspected prior to mobilisation (by environmental manager or nominated deputy) to ensure compliance. Toolbox talks will also be provided to relevant personnel on the content of this plan.

¹¹ Collin, S.B., MacIver, K., Shucksmith, R. (2015). A Biosecurity Plan for the Shetland Islands.

<https://www.nafc.uhi.ac.uk/t4-media/one-web/nafc/research/document/marine-spatial-planning/biosecurity-plan.pdf>

5.3.2 Intertidal works

The MNNS risk level of intertidal working areas will be determined through an intertidal invasive species survey conducted prior to any intrusive works. If the presence of MNNS is recorded in the working area, then the MNNS risk level will be set as high. If no MNNS are recorded, then the MNNS risk level shall be considered to be low.

For non-intrusive works (e.g. site visits and walkover surveys), and intrusive works (e.g. ground-breaking operations) in low risk areas the following measures will be implemented:

- Ensure footwear is clean (visually free from soil and debris) before entering site. If necessary, brush and wash with water;
- Ensure vehicles, plant and tools to be used on site arrive at the site clean (i.e. no visible debris from other areas/sites present), including when moving between areas. Waste-water from cleaning equipment, tools, and vehicles will not be released into the marine environment;
- If visible debris are present, the equipment shall not be permitted to enter the site; and
- Vehicles will keep to established tracks where possible.

For intrusive works in high risk areas, the above mitigation measures will be adhered to in addition to the following:

- Footwear will be cleaned and disinfected using appropriate disinfectants prior to entering and departure from the work site;
- Vehicles, plant and tools will be adequately cleaned and disinfected prior to entering, and before leaving site using appropriate methods, with particular attention to be paid to tires and wheel arches. Waste-water from cleaning equipment, tools, and vehicles will not be released into the marine environment; and
- A comprehensive equipment usage log (date, location, equipment/ Personal Protection Equipment (PPE)/vehicle used, cleaning method applied) to be maintained and supplied with the daily progress report.

6 Compliance and Reporting

Procedures for managing MNNS in line with this plan will be documented in contractor method statements, and all relevant documentation (e.g. Ballast Water Record Book, and anti-fouling certificates) will be provided to NKT as early as possible to determine compliance.

6.1 Actions in the Event of MNNS Sighting

If, in the event of the work MNNS are sighted, the following actions will be undertaken:

Sighting during intertidal survey (Weisdale Voe only)

Survey will be undertaken in advance of works in order that any necessary actions can be agreed prior to intertidal works commencing. If MNNS are sighted during the survey, the following actions will apply depending on type of MNNS:

- If suspected MNNS is a sessile organism (e.g. algae, bryozoan, sea squirt, etc.), the area will be isolated and marked off to prevent any interaction with the MNNS and the reporting protocol in section 6.2 followed.
- If suspected MNNS is a mobile species (e.g. crustacean), then it will be collected in a suitable container and retained for subsequent identification. The area will be intensively surveyed to identify the extent of the MNNS presence. The reporting procedure set out in 6.2 will be followed.

Regardless of type, if a suspected MNNS is present, all intertidal works at the landfall will utilise the procedure for working in areas of high biosecurity risk, as per Section 5.3.2 above.

Sighting during intertidal landfall work (Weisdale Voe only)

If a suspected MNNS is sighted on equipment/plant, that equipment/plant will be isolated, all traces of the MNNS removed, and the equipment/plant disinfected and removed from the marine and intertidal area for subsequent cleaning and drying. All traces of the suspected MNNS will be retained for identification and reporting purposes.

If not already in place, the procedure set out above for working in areas of high biosecurity risk will be implemented.

Sighting on a vessel

If, despite following the controls set out within this document, a suspected MNNS is sighted on a vessel working in the Project area, this should be immediately reported as per the protocol in Section 6.2. The vessel should move away from coastal waters if safe to do so whilst it awaits instruction on a suitable location for further inspection and hull cleaning. In no circumstances should the suspected MNNS be removed from the hull until the vessel is in its designated hull cleaning location.

If a suspected MNNS is sighted on vessel-based equipment (e.g. trenching tools, ROV's etc), the equipment will be isolated, cleaned thoroughly and dried before any further use of that piece of equipment in the marine environment. All traces of the suspected INNS will be retained for identification and reporting purposes. Waste-water from the cleaning process will not be disposed of into the marine environment.

6.2 Reporting

Any sighting of an MNNS shall be reported to the NKT environmental Manager who will report to SHE Transmission in order that SHE Transmission can discuss subsequent actions with the relevant competent authority and/or NatureScot. As much information on the sighting shall be recorded as possible (including pictures), including detailed location information.

Data shall also be shared via the required reporting portals as detailed by NatureScot and/or the GB Non-Native secretariat (i.e. for alert species, and those species where no designated recording mechanism is provided by NatureScot):

- NatureScot: <https://www.nature.scot/professional-advice/land-and-sea-management/managing-coasts-and-seas/marine-non-native-species>
- GB Non-Native Secretariat: <http://www.nonnativespecies.org/index.cfm?sectionid=81>

Table of Modifications

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A	2020-12-08	Cole, Andrew	First issue of document
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