Spiorad na Mara Offshore Wind Farm

Offshore Project

Environmental Impact Assessment Report

Marine Pollution Contingency Plan, Volume 3

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1 INTRODUCTION

1.1 OVERVIEW

1.1.1.1 This **Marine Pollution Contingency Plan (MPCP)** has been produced along with the Environmental Impact Assessment Report (EIAR) for the proposed Spiorad na Mara Offshore Wind Farm Project (hereafter referred to as 'the Offshore Project'). It aims to address the specific requirements of Commitment M031 to produce a Marine Pollution Contingency Plan/D048 as part of the application for Section 36 Consents to the Scottish Ministers to Spiorad na Mara Limited (referred to as "the Applicant") under section 36 (s.36) of the Electricity Act 1989.

1.1.1.2 This **MPCP** sets out the proposed framework for preventing, responding to, and managing potential marine pollution incidents during the construction, operation and maintenance (O&M), and decommissioning stages of the Offshore Project. This iteration of the document provides a high-level framework for marine pollution prevention and contingency planning. Detailed procedures, roles, and operational protocols will be developed post-consent and incorporated into the MPCP.

1.1.2 PROJECT BACKGROUND

1.1.2.1 The Applicant is proposing to develop the Project. The Project is an offshore wind farm (OWF) that will consist of up to 60 fixed-bottom Wind Turbine Generators (WTGs).

1.1.2.2 The Project will include both offshore and onshore infrastructure. This Management Plan supports the application for the offshore components of the Project as outlined in **Chapter 1: Introduction, Volume 1a** of the EIAR. The offshore components of the Project (the Offshore Project) includes all infrastructure and activities located seaward of Mean High Water Springs (MHWS) within the Array Area and Offshore Cable Area of Search (OCAS) (**Figure 1.2: Offshore Project Location, Volume 1b** of the EIAR). Further detailed information is provided in **Chapter 3: Project Description, Volume 1a** of the EIAR.

1.1.2.3 The Offshore Project is situated off the northwest coast of Isle of Lewis/*Eilean Leòdhais* and the Array Area is located approximately 5 km-13 km offshore and is approximately 161 km^2 in size. It will comprise WTGs, foundations, Offshore Cables, Offshore Substation Platform (if required), and Landfall. The Array Area combined with the OCAS is defined as the Offshore Project Boundary. The water depths across the Array Area range from 37 m-67 m with the southwest corner of the Array Area reaching 72 m. The proposed WTGs and fixed foundations will be located within a Turbine Area of approximately 140 km^2, within the Array Area.

1.2 PURPOSE OF THE MARINE POLLUTION CONTINGENCY PLAN

1.2.1.1 Marine pollution incidents, though typically rare during offshore renewable energy activities, can result in environmental harm if not managed appropriately. Pollution may arise from accidental release of fuels, oils, chemicals, or other harmful substances during the construction, O&M, or decommissioning of offshore infrastructure. Given the Offshore Project's scale and location in Scottish waters, it is essential to have appropriate contingency measures in place to prevent, control, and effectively respond to any marine pollution event.

1.2.1.2 The **MPCP** outlines measures to minimise the risk of pollution events and ensure an effective and coordinated response in the event of an incident, whilst supporting compliance with the EIAR, relevant marine licence conditions, and recognised best practice guidance. The MPCP will apply throughout the construction, O&M, and decommissioning stages of the Offshore Project and outlines pollution prevention, response, and control expectations for the various personnel roles involved across these stages (discussed later in Section 2 and **Table 2-1**).

1.2.1.3 This **MPCP** is submitted in line with standard practice for offshore renewable energy applications in Scotland/*Alba*. The **MPCP** provides a complete framework for pollution response, while recognising that detailed operational protocols will be finalised once the Principal Contractor(s) and O&M contractor(s) are appointed. Across recent ScotWind and Section 36 applications, marine pollution, emergency response, invasive non-native species (INNS), navigational safety and fisheries management plans have been submitted in outline form, with detailed and contractor specific procedures developed post-consent. This approach reflects the stage of design and procurement at the point of application and is consistent with accepted MD LOT practice. This **MPCP** will be updated and approved post-consent and approved as part of condition discharge prior to construction by Scottish Ministers in accordance with s.36 consent and associated Marine Licences.

1.2.1.4 The broad objectives of the **MPCP** are as follows:

- To provide a structured response framework for preventing and managing marine pollution incidents during all offshore construction, O&M, and decommissioning works;
- To safeguard the marine environment by ensuring compliance with applicable legislation, policy, and best practice measures for managing marine pollution incidents;
- To define clear responsibilities and communication pathways to support timely reporting, escalation, and response to pollution events or near misses;
- To support environmental compliance auditing and ensure pollution preparedness remains aligned with evolving risks, regulatory expectations, and environmental performance throughout the Offshore Project's lifecycle;
- To ensure adherence to the conditions of the Offshore Project's s.36 consent and associated marine licences, where applicable to pollution prevention and control.

1.2.1.5 **Table 1-1** provides the consents/licences conditions of relevance to the MPCP.

Table 1-1 Section 36 and marine licences conditions of relevance to the MPCP

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

1.2.1.6 This document will be further developed post-consent, once the final design and construction methods are confirmed. This **MPCP** should also be read in conjunction with the project description provided in **Chapter 3, Volume 1a** and the relevant parts of the following chapters:

- **Chapter 11: Benthic and Intertidal Ecology, Volume 2a;**
- **Chapter 12: Fish Ecology, Volume 2a;**
- **Chapter 13: Marine Mammals, Volume 2a;**
- **Chapter 14: Marine and Nearshore Ornithology, Volume 2a;**
- **Chapter 16: Shipping and Navigation, Volume 2a**;
- **Chapter 20: Other Sea Users and Recreation, Volume 2a;**
- **Chapter 21: Commercial Fisheries, Volume 2a;**
- **Chapter 22: Offshore Human Health, Volume 2a.**

1.2.1.7 The information and guidelines presented in the **MPCP** will be reviewed in consultation with the Maritime and Coastguard Agency (MCA) and Marine Directorate - Licensing Operations Team (MD-LOT) and will be re-submitted as a final version prior to the commencement of construction.

1.2.1.8 Post-consent, the **MPCP** shall be updated to state the legislative requirements; current standards of practice and best practice measures that define the standard of construction practice adhered to by the Contractors. However, adhering to the **MPCP** does not absolve the Applicant, or its third-party Contractors or Subcontractors from complying with legislation and bylaws relevant to their construction activities.

1.3 LEGISLATION AND GUIDANCE

1.3.1.1 The EIAR accompanies applications for offshore consents, licences and permissions for the Offshore Project to MD-LOT under Section 36 (s.36) of the Electricity Act 1989, the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009, for the offshore infrastructure seaward of MHWS.

1.3.1.2 There are 2 sets of Environmental Impact Assessment (EIA) regulations applicable to the Offshore Project: the Electricity Works (EIA) (Scotland) Regulations 2017 for offshore generating stations requiring s.36 consent; and the Marine Works (EIA) (Scotland) Regulations 2017 for marine licence applications within Scottish territorial waters (0-12 nautical miles) respectively.

1.3.1.3 This **MPCP** has been developed with reference to the following key legislation and guidance:

- MD-LOT Marine licensing and consenting: offshore renewable energy projects;
- The United Kingdom National Contingency Plan for Responding to Marine Pollution Incidents (2024);
- Offshore Renewable Energy Installations: Requirements, guidance and operational considerations for SAR and Emergency Response (MGN 654 Annex 5) (MCA, 2024);
- Regulation 26, Annex 1 of International Convention for the Prevention of Pollution from Ships (MARPOL) 73/78;
- The Merchant Shipping Notice (MSN) 1829 (M), Ship to Ship Transfer Regulations (2010);
- Bonn Agreement (2004), The Bonn Agreement Oil Appearance Code;
- Marine and Coast Guard Agency (MCA) (2014), The National Contingency Plan;
- Environmental Protection Act 1990;
- The Pollution Prevention and Control (Scotland) Regulations 2012;
- Marine (Scotland) Act 2010;
- Conservation of Habitats and Species Regulations 2017 (as amended).

1.3.1.4 The Marine Directorate guidance (2025) notes that mitigation and monitoring plans should contain sufficient information at application; however, it does not create a statutory requirement for fully finalised and contractor-ready plans at this stage. This **MPCP** is a comprehensive framework of measures, based on the information available at the time of the Section 36 application. The structure and content of this **MPCP** aligns with the 2025 guidance and reflects the accepted approach taken on other offshore wind projects. Following contractor appointment and finalisation of construction methodologies, detailed procedures and site-specific operational measures will be incorporated, preconstruction, into the **MPCP**.

1.4 SCOPE OF MARINE POLLUTION CONTINGENCY PLAN

1.4.1.1 This **MPCP** sets out the framework for the development of the **MPCP** post-consent, which will be prepared and approved prior to the commencement of construction. Prior to the start of construction the **MPCP** will be updated to include all sections required by regulatory guidance and industry best practice to ensure a comprehensive and effective approach to marine pollution prevention and response.

1.4.1.2 The key sections to be further developed (post-consent)in the **MPCP** are anticipated to cover, but are not limited to, the following:

- Overview and objectives;
- Defined roles and responsibilities for all parties involved in the implementation and management of the **MPCP**;
- Systematic categorisation of pollution incidents;
- Pollution risk assessment and mitigation measures;
- Detailed response procedures and escalation protocols;

- Reporting and notification requirements;
- Waste management procedures as it relates to marine pollution incidents;
- Training and competency requirements;
- Health and safety considerations;
- Site-specific spill response plans;
- Monitoring, audit, and review processes;
- Stakeholder engagement and communication protocols;
- Appendices (e.g., templates, contact lists, environmental sensitivity scoring, tier selection matrices, etc.).

1.4.1.3 Where detailed information is not yet available at this outline stage (for example, site-specific response plans, contact details, or finalised reporting templates), this document identifies these as placeholders. These sections will be developed in consultation with the Applicant, contractors, and relevant regulatory bodies, and incorporated into the **MPCP** prior to construction. The process for updating and approving these sections will follow the change management procedure outlined in **Appendix A**.

1.4.1.4 The Applicant would seek to incorporate existing established policies, procedures, and statements of compliance relating to marine pollution prevention and response. The **MPCP** is designed to complement and align with any such existing frameworks. Where appropriate, the **MPCP** will reference and integrate these existing policies to ensure a consistent, comprehensive, and coordinated approach to marine environmental protection and regulatory compliance. Further detail on the interface with existing Spiorad na Mara policies will be developed post-consent and incorporated into the **MPCP**, in consultation with the client and relevant stakeholders.

1.5 IMPLEMENTATION OF THE MARINE POLLUTION CONTINGENCY PLAN

1.5.1.1 The **MPCP** is in an iterative document that will evolve throughout the Offshore Project lifecycle and during refinement of the Offshore Project's detailed design process, procurement and construction. It will be updated as necessary to reflect changes in methodology, legislation, or best practice.

1.5.1.2 The content of this **MPCP** will be reviewed and refined in consultation with key regulatory bodies, including the MCA, MD-LOT, and the Scottish Environment Protection Agency (SEPA). A final version will be submitted for approval prior to the commencement of construction, ensuring it reflects the most current regulatory expectations and project-specific requirements.

1.5.1.3 To account for evolving project parameters, this **MPCP** may be subject to updates. Revisions may be required in response to changes in construction methodologies, the emergence of new environmental information, updates to legislation or best practice guidance, or the need for enhanced pollution prevention measures. The process for managing such changes is outlined in **Appendix A**.

1.5.1.4 The **MPCP**, subject to approval by Scottish Ministers/Licensing Authority, will be incorporated into the contracts for Principal Contractors responsible for the works and will apply to all offshore activities and assets within the Offshore Project Boundary, including vessels operated by Principal Contractors, Subcontractors, and their suppliers. All parties involved, including Principal Contractors, Subcontractors and their suppliers, must comply with the relevant provisions of the detailed **MPCP**. They are obligated to provide documentation outlining how they will guarantee both the implementation and monitoring of the **MPCP** requirements throughout their respective scopes of work. Contractors must also define their own spill response arrangements for operations outside the Offshore Project Boundary, subject to oversight and approval by the Applicant.

1.5.1.5 The MPCP will be updated post-consent and submitted to Scottish Ministers for approval prior to the commencement of offshore construction activities. The updated **MPCP** will incorporate contractor specific arrangements, detailed operational protocols, confirmed roles and responsibilities, environmental sensitivity scoring, spill response decision matrices, and notification flowcharts. This staged approach ensures that the **MPCP** fully integrates with the appointed contractor's environmental management systems while remaining consistent with the framework and commitments established in the **MPCP**.

1.5.1.6 The following elements will be developed post-consent and provided within the **MPCP** once construction contractors are appointed and detailed methodologies are confirmed:

- POLREP templates and notification flowcharts;
- Sampling, tracking and environmental sensitivity scoring protocols;
- Tier selection matrices for incident escalation;
- Site specific spill response plans informed by contractor equipment capability;
- Detailed waste handling, recovery and disposal routes;
- Contractor specific coordination, communication and reporting procedures.

1.6 OTHER RELATED MANAGEMENT PLANS

1.6.1.1 The **MPCP** will be developed with consideration of the content and requirements of other relevant Management Plans. These are set out in **Table 1-2** with details of the linkages.

Table 1-2 Other related Management Plans to the Marine Pollution Contingency Plan

Management Plan	Licence / consent conditions	Linkage with Marine Pollution Contingency Plan
Outline Offshore Environmental Management Plan	'[To be added post-consent]'	The plan provides the overarching framework for environmental management during the construction phase of the Offshore Project.

Management Plan	Licence / consent conditions	Linkage with Marine Pollution Contingency Plan
Outline Offshore Operation and Maintenance Plan	'[To be added post-consent]'	The plan provides the overarching framework for environmental management during the operation and maintenance phase of the Offshore Project.
Outline Navigational Safety and Vessel Management Plan	'[To be added post-consent]'	The plan provides an overview of the proposed measures and procedures for managing vessel movements and ensuring navigational safety during the construction and operation of the Offshore Project.
Marine Mammal Mitigation Plan (MMMP)	'[To be added post-consent]'	Provides mitigation measures for marine mammals that may be affected by pollution incidents. The **MPCP** will coordinate with MMMP where relevant.
Offshore Invasive Non-Native Species Mitigation Plan	'[To be added post-consent]'	Provides measures to prevent and manage INNS. Pollution incidents will be assessed for potential INNS risks.
Fisheries Mitigation Monitoring and Communication Plan	'[To be added post-consent]'	Outlines communication protocols and mitigation measures for interactions with commercial fisheries. The **MPCP** will manage and coordinate pollution incidents affecting fisheries with this strategy.
Outline Offshore Written Scheme of Investigation (WSI)	'[To be added post-consent]'	Sets out procedures for marine archaeology. The **MPCP** will ensure pollution incidents do not compromise archaeological sites.
Outline Lighting and Marking Plan	'[To be added post-consent]'	Supports navigational safety and pollution prevention through appropriate marking of offshore infrastructure.
Emergency Response and Cooperation Plan (ERCOP)	'[To be added post-consent]'	Will define coordination protocols for multi-hazard emergencies, including fire, collision, and pollution events. It supports compliance with MCA MGN 654 and will be appended to the Safety Zone Application. The **MPCP** will operate in conjunction with the ERCoP during complex or escalated incidents.
Decommissioning Plan	'[To be added post-consent]'	Will include pollution prevention and response measures during decommissioning. The **MPCP** will be updated accordingly.

2 ROLES AND RESPONSIBILITIES

2.1.1.1 This section will describe the roles and responsibilities relating to the implementation of the **MPCP**. The roles likely to be included are listed in **Table 2-1**.

2.1.1.2 Roles and responsibilities for environmental management across the Offshore Project are outlined in **Outline Offshore Environmental Management Plan (OEMP), Volume 3**. To avoid duplication, this **MPCP** cross-refers to the Outline OEMP and only introduces additional roles specific to marine pollution prevention and response. These roles will be confirmed following Offshore Project consent and refined as needed throughout the different stages of the Offshore Project. Final definitions and agreement on these responsibilities will be reached with MD-LOT prior to the start of construction works. A preliminary overview of the roles and associated responsibilities in relation to the **MPCP** is presented in **Table 2-1**.

2.1.1.3 In addition to the responsibilities outlined below, all parties are required to comply with any existing policies and statements (from the Applicant) of compliance relevant to marine pollution prevention and response. The **MPCP** is intended to complement and align with these existing frameworks, and roles described herein include ensuring such compliance is maintained throughout the project lifecycle.

Table 2-1: Marine Pollution Contingency Plan roles and responsibilities

Role	Contact Details	Responsibility
The Applicant	[To be added post-consent]	Ensuring Contractors and Subcontractors take appropriate responsibility for pollution events.
Applicant's Environmental Manager/Offshore Consents Manager	[To be added post-consent]	Leads day-to-day implementation of the **MPCP**. Oversees pollution preparedness, spill response readiness, training, and record keeping. Coordinates emergency responses and liaises with the Applicant and regulators.
The Environmental Clerk of Work (ECoW)	[To be added post-consent]	Providing quality assurance for the **MPCP**, ensuring it is implemented in line with consent conditions and is responsible for reporting on compliance and incidents
Marine Coordinator	[To be added post-consent]	Main point of contact should a pollution event occur. Will also oversee any pollution responses.
Master of the Contractor's Vessel	[To be added post-consent]	Initiates the vessel's Shipboard Oil Pollution Emergency Plan (SOPEP), leads the immediate on-board response to spills, and reports incidents to His Majesty's (HM) Coastguard and the Marine Coordinator. Coordinates with the Contractor's Emergency Response Team (CERT) and spill responders as required.

Role	Contact Details	Responsibility
Contractor and Subcontractors	[To be added post-consent]	They will be expected to comply with the Applicant's **MPCP** as well as produce their own. They will also be expected to ensure their staff have adequate pollution prevention and response training.
Spill Response Contractor	[To be added post-consent]	Provides spill response equipment, trained personnel, and technical expertise. Supports the Contractor during Level 2 and 3 incidents and maintains 24/7 readiness as detailed in the Contractor's **MPCP**.

3 MARINE POLLUTION PREVENTION CONTINGENCY PLANNING

3.1 INTRODUCTION

3.1.1.1 The **MPCP** establishes the framework for responding to marine pollution incidents during the construction, O&M and decommissioning phases of the Offshore Project. All actual or suspected spills, regardless of volume or origin, must be reported and managed in accordance with this plan and relevant contractor procedures. Site-specific spill response protocols will be developed post-consent and included in the **MPCP** post-consent and prior to the commencement of any construction activities.

3.1.1.2 The **MPCP** aligns with the UK's National Contingency Plan (NCP) for Marine Pollution and relevant Scottish frameworks. It recognises the tiered response structure coordinated by the MCA, with support from the MD-LOT, the SEPA, and other statutory bodies. The **MPCP** will interface with SOPEPs, Port and Harbour Oil Spill Contingency Plans (OSCPs), and Contractor-specific Marine Pollution Contingency Plans. Detailed coordination procedures and contact protocols will be developed post-consent and included in the **MPCP**.

3.2 CATEGORISATION OF INCIDENTS

3.2.1 MARITIME AND COASTGUARD AGENCY CATEGORISATION OF OIL SPILL INCIDENTS

3.2.1.1 The Offshore Project will adopt the MCA's three-tiered approach (outlined below and shown in **Plate 3-1**) to describing the scale of an incident under their National Contingency Plan (MCA, 2014). Post-consent spill volume calculations will be developed and included in the **MPCP**, in accordance with the Bonn Agreement Oil Appearance Code (BAOAC Bonn Agreement, 2014). This calculation method is a standardised method used to estimate the volume of the oil spilled based on its appearance. The percentage coverage of each spill zone is assessed and then multiplied by the relevant volume range (layer thickness interval) to get the estimated total oil volume, as shown in **Table 3-1.**

Table 3-1 The calculation used to estimate the volume of an oil spill as per the BAOAC Bonn Agreement, 2014

Code	Description - Appearance	Layer Thickness Interval (µm)	Litres per km^2
1	Sheen (silvery/grey)	0.04 - 0.30	40 – 300
2	Rainbow	0.30 - 5.0	300 – 5000
3	Metallic	5.0 - 50	5000 – 50,000
4	Discontinuous True Oil Colour	50 - 200	50,000 – 200,000
5	Continuous True Oil Colour	More than 200	More than 200,000

3.2.1.2 Building on this, the 3 tiers of MCA's approach categorise the severity of a spill incident and stipulate the type of resources required to address it. It also details the party responsible for responding to the spill incident. The tiered system ensures that local resources are used in the first instance and escalated to resource beyond this only when necessary to protect the environment.

3.2.1.3 Three-tier response framework:

- Tier 1 (Operator-led): Minor, site-specific incidents managed by the Project team;
- Tier 2 (Port-led): Larger incidents requiring support from Port Authorities and OSCPs;
- Tier 3 (MCA-led): Major incidents triggering national emergency response under the NCP.

3.2.1.4 For a Tier 1 spill, immediate action is required by the responsible party be this a ship operator or harbour authority member. They are to deploy local equipment such as absorbent pads and booms the contain the spill. Once contained, the spill is to be reported to the nearest HM Coastguard Operating Centre and local authorities are to be informed.

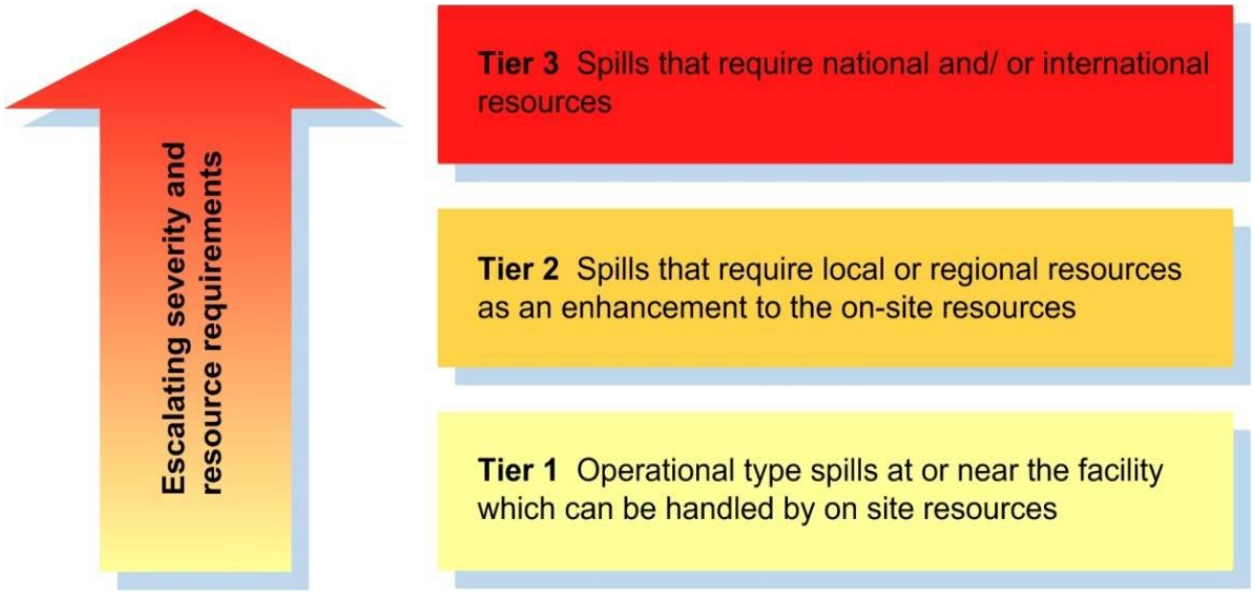
3.2.1.5 For a Tier 2 spill, the responsible party is to call on regional resource and their mutual aid agreements. This will allow for additional equipment and trained personnel from nearby ports and oil spill response organisations to be deployed. The incident has to be reported to the to the nearest HM Coastguard Operating Centre as well as the MCA Counter Pollution and Salvage Branch.

3.2.1.6 For Tier 3 spills, the HM Coastguard Operating Centre and the MCA Counter Pollution and Salvage Branch have to be notified immediately and the Secretary of State's Representative may be appointed to manage the spill and intervention decisions. Part of this process will likely include the deployment of national resources such as a Marine Response Centre, national stockpiles of equipment and the mobilisation of trained national response teams. An overview is provided in paragraph 5.2.1.2.

3.2.1.7 All ports used during construction, O&M, and decommissioning stages will have their own pollution mitigation strategy, which take precedence over this **MPCP** for any incident occurring within port limits. For incidents at sea, this **MPCP** will guide the Offshore Project's response, coordinated with the UK NCP for Marine Pollution and any relevant regional pollution response arrangements.

3.2.1.8 The **MPCP** will be updated post-consent to define escalation procedures, contact lists, and coordination protocols with statutory agencies and emergency responders.

Plate 3-1 Conceptual overview of the three-tier response framework



4 PROJECT POLLUTION AND RISK ASSESSMENT

4.1 POLLUTION EVENTS IN THE CONTEXT OF THE OFFSHORE PROJECT

4.1.1.1 Offshore wind farm developments such as the Offshore Project may encounter small-scale, operational spills (Tier 1), typically arising from vessel servicing, bunkering, or accidental discharge of hydrocarbons such as oils or hydraulic fluids. While the probability of large-scale spills is considered low, worst-case scenarios such as vessel collisions or impacts with WTGs, Offshore Substation Platform, or foundations, could necessitate a Tier 2 or Tier 3 response.

4.1.1.2 The primary hydrocarbons associated with the Offshore Project are expected to be marine gasoil and potentially intermediate fuel oil, carried aboard construction and O&M vessels. Response planning will consider prevailing meteorological and oceanographic conditions in the region and proximity to sensitive receptors.

4.1.1.3 As described in Section 3, the Offshore Project's response to pollution incidents is structured according to the UK NCP for Marine Pollution and relevant international obligations, ensuring a proportionate and coordinated approach across all stages of the Offshore Project.

4.1.1.4 Regarding dropped objects, any object dropped at sea that is considered a potential navigational hazard by the Applicant, its contractors, or subcontractors will be documented and reported to MD-LOT using the designated dropped objects reporting form (Scottish Government, 2024).

4.2 OFFSHORE PROJECT POLLUTION RISK ASSESSMENT

4.2.1.1 A full risk assessment will be undertaken and included in the MPCP prior to the start of any construction activities to identify potential sources of marine pollution during construction and O&M. This will include consideration of credible spill scenarios and outline mitigation measures designed to reduce pollution risk to as low as reasonably practicable. Operational activities and vessel types will be refined during detailed design and contractor engagement with updates to the **MPCP** following the change management process outlined in **Appendix A** of this **Marine Pollution Contingency Plan, Volume 3**. They will be coordinated with the **Outline Offshore Environmental Management Plan, Volume 3** to ensure alignment with monitoring and reporting commitments.

4.2.1.2 The risk assessment, including scenario-specific controls and response capabilities, will be developed and included in the **MPCP** post-consent. It will be reviewed and updated as necessary to reflect changes in project methodology, regulatory requirements, and best practice guidance.

5 OFFSHORE PROJECT PROCEDURE FOR RESPONDING TO POLLUTION INCIDENTS

5.1 INTRODUCTION

5.1.1.1 This **MPCP** establishes the framework for responding to marine pollution incidents during all offshore phases of the Project. All actual or suspected spills, regardless of volume or origin, must be reported and managed in accordance with this plan and relevant contractor procedures. Site-specific spill response protocols will be developed post-consent with the **MPCP** updated and approved accordingly.

5.2 RESPONSE OVERVIEW AND NOTIFICATIONS

5.2.1.1 In the event of a marine pollution incident, the Offshore Project will follow a structured response protocol aligned with the UK NCP. The response will be led by the relevant party depending on the source and location of the spill and the tier of the spill, as describe in **Plate 3-1**.

5.2.1.2 For pollution spills, the vessel Master will:

- Notify HM Coastguard and the Marine Coordinator;
- Submit a Pollution Report (POLREP) to the Maritime Rescue Coordination Centre and the Marine Coordinator;
- Activate the vessel's SOPEP.

5.2.1.3 The Contractor will:

- Lead containment and clean-up operations;
- Engage specialist spill response subcontractors if required;
- Coordinate with the Marine Coordinator and Environment Manager/Offshore Consents Manager.

5.2.1.4 The Marine Coordinator will:

- Facilitate communication between all parties;
- Ensure regulatory notifications are completed;
- Support coordination with external agencies.

5.2.1.5 The Marine Coordinator will maintain a live incident log and ensure that all notifications are documented and escalated in accordance with the tiered response framework. Coordination with the ERCoP will ensure alignment with broader emergency protocols.

5.2.2 DATA COLLECTION ON THE INITIAL INCIDENT

5.2.2.1 Initial incident data will be collected by the vessel Master or site personnel and passed to the Marine Coordinator. This will include:

- Time and location of the spill;
- Source and type of pollutant;
- Estimated volume and spread;
- Immediate actions taken.

5.2.2.2 Post-consent and prior to construction the **MPCP** will be updated to include standardised templates for incident reporting, including POLREP forms and sampling protocols.

5.2.3 ESCALATION AND STRATEGY SELECTION

5.2.3.1 The Offshore Project will use a tiered escalation guide to determine the appropriate response level. This will be based on:

- Estimated spill volume;
- Proximity to sensitive receptors;
- Resource availability;
- Regulatory thresholds.

5.2.3.2 Response strategies will be selected accordingly:

- Tier 1: use of onboard spill kits, containment booms, and contractor-led clean-up;
- Tier 2: co-ordination with Port Authorities and mobilisation of regional resources;
- Tier 3: MCA-led response with national assets and inter-agency coordination.

5.2.4 DISPERSANT USE AND REGULATORY COMPLIANCE

5.2.4.1 Dispersant application will only be considered under MCA and Marine Management Organisation (MMO) guidance (MMO, 2023a; 2023b; 2024; 2025) and subject to SEPA approval. Post-consent the **MPCP** will be updated to include:

- Dispersant approval protocols;
- Emergency contact procedures;
- Sampling and verification methods.

5.2.5 COORDINATION WITH CONTRACTORS AND SUBCONTRACTORS

5.2.5.1 All Contractors must:

- Maintain compliant **MPCPs** and SOPEPs;
- Train personnel in spill response procedures;

- Ensure equipment is inspected and maintained;
- Co-operate fully with the Applicant and statutory authorities during incidents.

5.2.6 DEFERRED CONTENT FOR FINAL MPCP

5.2.6.1 The following elements will be developed post-consent and included in the **MPCP**:

- POLREP templates and notification flowcharts (**Appendix B**);
- Sampling and tracking protocols (**Appendix C**);
- Environmental sensitivity scoring (**Appendix D**);
- Tier selection matrices (**Appendix E**);
- Dispersant application procedures (**Appendix F**);
- Site-specific spill response plans (**Appendix G**).

5.3 REPORTING

5.3.1.1 Post-consent this section of the **MPCP** will include detail of the reporting process for pollution incidents, including the notification to the MD-LOT, MCA, and SEPA. Other installations in the vicinity of the Offshore Project will also be notified as appropriate.

5.4 WASTE MANAGEMENT

5.4.1.1 Post-consent this section of the **MPCP** will set out waste management plans which will differ according to the Tier of the pollution incident.

5.5 TRAINING AND HEALTH AND SAFETY

5.5.1.1 Post-consent this section of the **MPCP** will include a training matrix that identifies training requirements. It will also include health and safety information as any pollution incident represents a potentially hazardous environment.

5.6 POLLUTION IN THE VICINITY OF THE OFFSHORE PROJECT

5.6.1.1 In the case that pollution from an unidentifiable source is drifting towards the Offshore Project, the Offshore Project shall comply fully with any instructions from the MCA or other relevant authority, in order to facilitate an appropriate pollution response. This may include stopping all construction operations of the wind farm to allow mechanical recovery of the pollution or dispersant application.

6 GLOSSARY OF TERMS AND ABBREVIATIONS

6.1.1.1 A list of key terms and acronyms used in this Management Plan are provided in **Table 6-1** and **Table 6-2**.

Table 6-1 Acronyms and abbreviations

Term	Definition
CERT	Contractor Emergency Response Team
ECoW	Environmental Clerk of Works
EIAR	Environmental Impact Assessment Report
EMP	Environmental Management Plan
ERCoP	Emergency Response Cooperation Plan
INNS	Invasive Non-Native Species
MARPOL	International Convention for the Prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MPCP	Marine Pollution Contingency Plan
MSN	Merchant Shipping Notice
NCP	UK National Contingency Plan
OCAS	Offshore Cable Area of Search
OSCP	Oil Spill Contingency Plan
OWF	Offshore Windfarm
POLREP	Pollution Report
SEPA	Scottish Environment Protection Agency
SOPEP	Shipboard Oil Pollution Emergency Plans
NSVMP	Navigational Safety and Vessel Management Plan
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator

Table 6-2 Glossary

Term	Meaning
Array Area	Total area within which offshore wind turbine generators (WTGs), associated foundations, Array Cables and Offshore Substation Platform (if required) will be located.
Environmental Impact Assessment Report (EIAR)	The Environmental Impact Assessment Report (EIAR) prepared to assess the likely significant effects of the Offshore Project on the environment.
Marine Directorate - Licensing Operations Team (MD-LOT)	The regulator for determining marine licence applications on behalf of the Scottish Ministers in the Scottish inshore region (between 0 and 12 nautical miles) under the Marine (Scotland) Act 2010, and in the Scottish offshore region (between 12 and 200 nautical miles) under the Marine and Coastal Access Act 2009.
Offshore Cables	Electrical and communication cables located within the Offshore Cable Area of Search (OCAS) and Array Area.
Offshore Cable Area of Search (OCAS)	The area within which the Offshore Cable infrastructure between the Array Area and Landfall will be located.
Offshore Project (Offshore Components of the Project)	Components of the Project seaward of MHWS. Includes Array Area plus Offshore Cable Area of Search.
Offshore Substation Platform	The optional offshore substation located within the Array Area. Includes the platform and associated components which allows the voltage to be increased to meet onward transmission requirements.
Offshore Project Boundary	The 'red line boundary' encompassing the Offshore Project.
the Applicant	Spiorad na Mara Limited (the Project owner).

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APPENDIX A PROCEDURE FOR MANAGEMENT OF CHANGE

[This appendix will be developed post-consent and will define the procedures for managing changes to the **MPCP**. It will include triggers for review, approval pathways, and documentation requirements to ensure the plan remains current and effective throughout the Offshore Project lifecycle. The procedure will align with the Project's Environmental Management System (EMS) and regulatory expectations].

APPENDIX B POLREGS TEMPLATES AND NOTIFICATION FLOWCHARTS

[This appendix will be developed post-consent and will define the PLOREG templates to be used and notification flowchart to be followed for the **MPCP**].

APPENDIX C SAMPLING AND TRACKING PROTOCOLS

[This appendix will be developed post-consent and will define the sampling and tracking protocols that will be followed for the **MPCP**].

APPENDIX D ENVIRONMENTAL SENSITIVITY SCORING

[This appendix will be developed post-consent and will define the environmental sensitivity scoring that will be followed in the **MPCP**].

APPENDIX E TIER SELECTION MATRICES

[This appendix will be developed post-consent and will define the tier selection matrices that will be followed in the **MPCP**].

APPENDIX F DISPERSANT APPLICATION PROCEDURES

[This appendix will be developed post-consent and will define the procedures for dispersant application use for the **MPCP**. The procedure will align with the Project's EMS and regulatory expectations].

APPENDIX G SITE-SPECIFIC SPILL RESPONSE PLANS

[This appendix will be developed post-consent and will define the site-specific spill response plans for the **MPCP**. The plans will align with the Project's EMS and regulatory expectations].

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