MEY-1A-40-HSE-002-D-
NavigationSafetyPlanHDD

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Project Title/ Location	MeyGen Tidal Energy Project, Phase 1a. Inner Sound.
Date:	31/03/2015

MeyGen Tidal Energy Project Phase 1 Navigation Safety Plan: HDD Marine Works



James Fisher and Sons plc Marine Services Worldwide



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EXECUTIVE SUMMARY

This Navigation Safety Plan (NSP) has been prepared by MeyGen Ltd to set out the proposed method for discharging Condition 17 of the Section 36 Consent for the Development.

The purpose of the NSP is to ensure that the Developments marine activities are conducted in a safe manner considerate of consent conditions and industry best practice. The document will be periodically reviewed during the execution of the Development to provide detailed information relevant to the key activities to be undertaken through the construction and operational phases of the Development;

- I. Horizontal Directional Drilling Marine Works
- II. Construction Works
- III. Operations and Maintenance
- IV. Decommissioning

Upon addition of above listed detailed information, the revised NSP will be reissued 3 months prior to the commencement of that phase of the Development.

The marine works must, at all times, be constructed and operated in accordance with the approved NSP. The NSP includes information relating to following details:

- a) Navigational safety measures;
- b) Emergency Response Co-ordination Plan;
- c) Safety zones;
- d) Promulgation of information to mariners;
- e) Buoyage;
- f) Anchoring areas; and
- g) Lighting and marking of cable landfall site(s).

The NSP presented within this document is considered sufficient to satisfy Condition 17 and enable the construction and operation of the Development to progress, subject to the NSP being implemented.

The NSP will be presented to the Scottish Ministers, the MCA, NLB and any other navigational advisors or other advisors as may be required at the discretion of the Scottish Ministers.

THIS DOCUMENT ONLY CONSIDERS HDD MARINE WORKS. FURTHER VERSIONS OF THE NSP FOR OTHER CONSTRUCTION WORKS PHASES, OPERATIONS AND MAINTENANCE AND DECOMMISSIONING WILL BE UPDATED AND SUBMITTED FOR CONSULTATION AND APPROVAL PRIOR TO THAT PHASE COMMENCING.

1 INTRODUCTION

The MeyGen Tidal Energy Project Phase 1 ("the Development") received consent under Section 36 of the Electricity Act 1989 from the Scottish Ministers 9th October 2013 ("the S.36 Consent"). This Navigation Safety Plan (NSP) is prepared to enable Condition 17 of the S.36 Consent ("the Condition") to be discharged. Condition 17 states:

The Company must, prior to the Commencement of the Development, submit a Navigational Safety Plan, in writing, to the Scottish Ministers for their written approval, in consultation with the Maritime and Coastguard Agency, the Northern Lighthouse Board, the Chamber of Shipping and any other navigational advisors, or such other advisors, as may be required at the discretion of the Scottish Ministers. The Navigational Safety Plan must include, but is not limited to, the following issues:

- (a) Navigational safety measures;
- (b) Emergency Response Cooperation Plan;
- (c) Safety zones;
- (d) Promulgation of information to mariners;
- (e) Buoyage;
- (f) Anchoring areas; and
- (g) Lighting and marking of cable landfall site(s).

The Development must be constructed and operated in accordance with the Navigational Safety Plan at all times.

Reason: In the interests of safe navigation.

This document sets out the proposed NSP that MeyGen Ltd intends to undertake, to allow the Condition to be discharged.

2 SCOPE OF NAVIGATIONAL SAFETY PLAN

Phase 1a of the Development is a 6MW, 4 tidal turbines initial phase to be installed and operatives under the restriction placed on the Development by Condition 2 of the S.36 Consent.

This document is currently the NSP for the marine works associated with the Horizontal Directional Drilling (HDD) Works for Phase 1a only ("**HDD Marine Work**").

Given the Phase 1a programme for construction works associated with Phase 1a it has been agreed with the licensing authority that the NSP and other related consent documents can be updated for the installation of the Phase 1a infrastructure (4 x Tidal Turbine Generators (TTG), 4 x Gravity-base Turbine Support Structures (TSS) and Turbine Subsea Cables (TSC) and submitted at a later date "**the Construction Works**". MeyGen Ltd. will produce and update relevant documents for these construction works; these will be submitted and get

approval prior to commencement of these works.

The NSP will apply to the HDD Marine Works and vessels transiting between the site and associated ports.

The NSP forms part of a suite of documents related to the consent conditions that MeyGen Ltd. seek to discharge:

- Environmental Management Plan (EMP) (S.36 Consent, Condition 11) including Marine Pollution Contingency Plan (Marine Licence, Condition 3.2.13), Reporting Protocol for the Discovery of Marine Archaeology (S.36 Consent, Condition 16);
- Construction Method Statement) (S.36 Consent, Condition 9); and
- Vessel Management Plan (VMP) (S.36 Consent, Condition 14).

The purpose of the NSP is:

• To mitigate the navigational risk to the Development and other legitimate users of the sea.

The scope of the NSP will include as a minimum:

- Commercial shipping operations and marine services;
- Commercial Fisheries; and
- Marine leisure and sports activities;

The NSP has been developed in consideration of the MGN 371 (M+F) Offshore Renewable Energy Installations Guidance on UK Navigational Practice, Safety and Emergency Response Issues and is in accordance with the Environmental Statement (ES) and the Supplementary Environmental Information Statement (SEIS).

It is intended that this NSP will be regularly reviewed throughout the planning and development of specific marine activities and revisions approved by the Scottish Ministers in accordance with the Condition.

The document contains the following sections:

- Communications, Role and Responsibilities;
- Method Statement and Programme;
- Navigational Sensitivities (other users);
- MeyGen Ltd. Commitments & Legislative Commitments;
- Navigational Safety Measures;
- Construction Safety Zones;
- Notice(s) to Mariners and Radio Navigation Warning;
- Anchoring Areas;
- Temporary Construction Lighting and Marking;

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- Emergency Response;
- Buoyage;
- NSP Review and Consultation; and
- References.

3 COMMUNICATION, ROLES AND RESPONSIBILITIES

This section details the Development team roles, responsibilities and lines of communication during the construction and operation of the Development.

3.1 Responsibilities and Ownership

The Principal Contractor (PC) will have the delagated responsibility for ensuring the implementation of the NSP.

The Ecological Clerk of Works (ECoW) will provide quality assurance and approval of any version of the NSP.

Any updates to the NSP by the PC will require the ECoW to check compliance with current legislation, consent conditions and related documents. Updated NSP will then be submitted to Scottish Ministers for approval.

3.2 Organisational Chart

The organisational chart for the HDD Marine Works is below in Figure 1. This includes how communication as part of the NSP will be conducted in normal working procedures and in the case of emergencies.

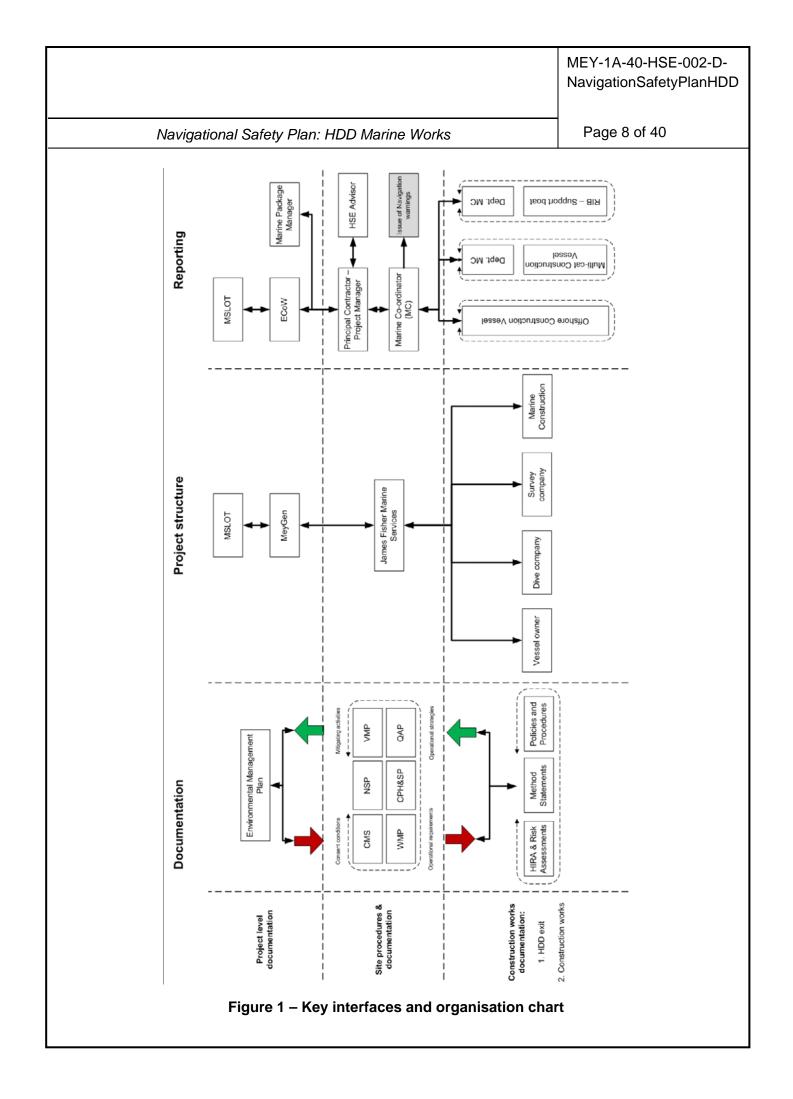
The organisation chart presents the key interfaces, lines of communication and responsibilities with regards to the flow of requirements and provision of mitigating actions across the HDD Marine Works.

Details are provided in the Table 1 below for contacts relevant to the delivery of this plan. These details may change and the CMS will be updated when necessary.

Name	Role	Organisation	Telephone	Mobile
lan Sargent	Project Manager	James Fisher Marine Services	01565 658812	
Stan Groundwater	Marine Coordinator	James Fisher Marine Services	01565658824	
Tony Blackshaw	HSE Advisor	James Fisher Marine Services	01565 658817	

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Ed Rollings	ECoW	MeyGen Ltd	+441316599662	
Fraser Johnson	Marine Package Manager	MeyGen Ltd	+441316599672	

Table 1 Contact Details



3.3 MeyGen - Ecological Clerk of Works

- Review and approve all consent related documents (S36 Condition 10).
- Review / comment on content of Site Inductions and Toolbox Talks.
- Review / comment on Risk Assessments and Method Statements (RAMS) as and where necessary with respect to environmental impacts and controls.
- Inspect the site / vessel on a regular basis to ensure effective implementation/operation of all environmental mitigation measures.
- Audit PC procedures, inspections, investigation and reporting.
- Ensure compliance with approve consent related documents, environmental legislation and requirements and address any shortfalls with the PC (S36 Condition 10).
- Review environmental incidents / near misses and PC investigations
- Report compliance and incidents to the licensing authority and other necessary regulatory authorities.
- Notify the licensing authority of vessel details (ML Condition 3.1.3)
- Notify the licensing authority of the commencement date (ML Condition 3.2.1.4)
- Provide Transport Audit Sheets for works to the licensing authority (ML Condition 3.2.2.1)
- Notify the licensing authority of deposits by MHWS (ML Condition 3.2.2.2)
- Ensuring any protected species licenses are in place for the Development (S36 Condition 10)

3.4 Principal Contractor – James Fisher Marine Services (JFMS)

- 3.4.1 Project Manager
 - Facilitate dissemination of specific navigational requirements to the project team.
 - Oversee the implementation and review of navigational procedures throughout the project.
 - Review and approve all consent related documents, including, but exhaustive, CMS, VMP and NSP.
 - Monitor the navigational performance of the project through maintaining an overview of incidents, inspections and audits.
 - Ensure that navigational considerations form an integral part of Design and Implementation of the Works and to include marine reviews as part of regular project meetings.
 - Review and approve Risk Assessments and Method Statements (RAMS) as and where necessary with respect to navigational impacts and mitigation.
 - Ensure that all navigational incidents are reported to the ECoW and MeyGen in

accordance detailed reporting requirements and the respective regulatory bodies (where required) as soon as possible.

- Review navigational matters with the ECoW and MeyGen and respective regulatory bodies on a regular basis and as per project requirements.
- Ensure that arrangements for liaison with Development respective regulatory bodies on all navigational issues is appropriate and maintained.
- Implement and maintain a project communications strategy to manage project public relations and complaints.
- Produce weekly and monthly reports and submit to MeyGen Package Manager and ECoW.
- Ensure contractors are approved, operates a Safety Management System, confirm that they are suitably qualified in their line of work and have undertaken suitable environmental training to cover tasks to be undertaken.

3.4.2 HSE Advisor

Key roles and responsibilities of the HSE Advisor include, but are not limited to the following:

- Verify compliance with relevant legislation.
- Prepare, implement, review and update consent related documents (in conjunction with the Project Management Team) in accordance with consent condition, James Fisher Marine Services procedures and current legislation.
- Advise the project team on environmental related decision making
- Review Risk Assessments and Method Statements (RAMS) as and where necessary with respect to navigational impacts and mitigation.
- Approve Toolbox Talks and Site / Vessel Inductions and ensure content promotes effective marine operational management, specific works and Site / Vessel sensitivities and communicate associated lessons learnt.
- Provide support to the Marine Coordinator and workforce on any environmental matters that may arise.
- Audit contractors to confirm that they are suitably qualified in their line of work and have undertaken suitable environmental training to cover tasks to be undertaken.
- Ensure suitable consideration is given to the period and frequency of environmental monitoring (particularly with respect to higher risk areas).
- Inspect and audit the site / vessels on a regular basis to ensure effective implementation / operation of any environmental mitigation measures.
- Ensure compliance with environmental requirements and address any shortfalls.
- Provide inspection reports to the project management detailing any issues that must be addressed
- Obtain specialist marine expertise to assist in any of the above tasks as required.

- Undertake investigations into environmental incidents or near misses to determine the root/direct cause and present the findings, recommendations and lessons learnt.
- Monitor hazardous observations and incidents trends in relation to environmental aspects and impacts and initiate actions as required to minimise the potential environmental impacts and reduce risk in a timely and effective manner.

3.4.3 Marine Coordinator

- Responsible for all construction operations Marine Coordination including vessel / site HSE during construction operations.
- Ensure that all contractors have received and understood the Site / Vessel induction.
- Undertake Toolbox Talks to promote effective environmental management and communicate associated lessons learnt.
- Monitor and disseminate weather information and forecasts
- Production of marine safety alerts including issuing Notice to Mariners to agreed stakeholder list.
- Responsible for collating, communicating and responding to statutory navigation notices.
- Liaise with port authorities.
- Implement / operate environmental mitigation measures as approved in the consent related documents at the site / vessel.
- Coordinating, ensuring compliance for and recording all vessel movements and personnel movements offshore.
- Emergency response coordination.
- Produce daily reports and submit to the PC Project Manager, MeyGen Package Manager and ECoW.
- Keep Transport Audit Sheets for all materials listed in the licence to be deposited as part of the works
- Keep audit reports stating the nature and quantity of all substances and objects deposited below MHWS under the authority of the licence.

3.5 Contractors

- 3.5.1 Vessel Master
 - Overriding authority and responsibility to make decisions with respect to safe navigation of the vessel and matters related to HSE.
 - Dedicated watch-keeper on board the vessel, or nominate suitable qualified deputy.
 - The persons present on board must adhere to the Vessel Master's instructions.
 - Adhere to IMO International Regulations for the Prevention of Collisions at Sea, UK Merchant Shipping legislation (including ensuring appropriately trained and qualified

crew and personnel on board) and other primary marine legislation or codes applicable to the vessel's size.

- Adhere to vessel owner's (or managers), charterer and clients standing navigational orders and operational guidelines subject to the overall safety of the vessel.
- Ensure that all contractors have received and understood the vessel induction including abandonment.

3.5.2 All Other Staff

- To understand and implement procedures relevant to their role as laid out.
- To conduct their work with a view to eliminating/reducing the environmental impact of the Development and to raise any environmental concerns with Marine Coordinator or Project Manager.
- Operate in a safe and efficient manner and "stop the job" if the potential for an unsafe act is developing.
- To report all environmental incidents to the Marine Coordinator and Vessel Master as soon as possible.

3.6 Communication

Environmental issues will be formally communicated through the arrangements on Site / Vessel in Table 2.

Meeting/briefing	Frequency	Attendees
Safety, Health, Environment,	Weekly	See paragraph below
Security and Quality (SHESQ)		
and Progress Meeting		
Daily site team briefs	Daily	All work parties
Risk Assessment/Method	Each job task	All members of the working
Statement briefings		party
Toolbox Talks including	Before mobilisation, or a	All Site / Vessel personnel
environmental practices and	minimum of one	
mitigation measures	per week	
Pre commencement navigational	Once before task	Vessel Master, Marine co-
meeting	commences	ordinator, Harbour Master.
Site / Vessel Induction	On first attendance at	All persons attending Site /
	site <u>BEFORE</u> any work	Vessel
	is undertaken	
Passage Planning Meeting	Prior to each departure	Master, Bridge Team

Table 2 Communication and Meetings

3.6.1 SHESQ and Progress Meeting

The PC shall convene weekly Site / Vessel meetings with all contractors on Site / Vessel to communicate, discuss and consult any change in conditions, working practices and environmental arrangements, procedures and overall SHESQ performance.

The ECoW and representatives from MeyGen and other interested Third Parties shall have an open invitation to attend these weekly Site / Vessel meetings. Each contractor on Site / Vessel shall nominate a person to attend these meetings with the appropriate authority to act on those contractors behalf. SHESQ and Progress Meetings shall be augmented by additional meetings at intervals dictated by the requirements of the contract or at key stages of the works.

Minutes of all such meetings shall be produced and held on file for record purposes, with copies supplied to each contractor on Site / Vessel, the CDM Co-ordinator and ECoW.

3.6.2 Extraordinary meetings

Extraordinary meetings would be held in order to deal with special navigational issues that may arise during the Development such as navigational incidents. These meetings shall be organised by the HSE Advisor with the aim of ensuring a timely response and resolution to any identified issues.

3.6.3 Daily Site / Vessel team meetings

Daily site team meetings will take place at the Onshore / Offshore site between the PC and contractors. Any navigational concern shall be addressed at this meeting.

3.6.4 Risk Assessment / Method Statement briefings

These briefings will take place before each construction task and attended by all directly involved in the task. Operational requirements and mitigation measures will be instructed and reviewed.

3.6.5 Site / Vessel inductions

Inductions, conducted before anyone commences work on the project are utilised to raise awareness for personnel regarding Site / Vessel rules, emergency response procedures and if applicable navigational protection arrangements. The inductions include a test to confirm understanding.

3.6.6 Site / Vessel notice boards

Site / Vessel notice boards will contain relevant Site / Vessel information relating to Health, Safety and Environmental issues. The Site / Vessel will also have appropriate signage in place to highlight awareness of environmental hazards. Other communications media, such as newsletters and posters will also be posted on notice boards to communicate awareness of environmental / navigational matters.

3.7 Reporting

The PC will communicate the following to the ECoW and contractors on Site / Vessel:

- Details of audits and inspections;
- Details and statistics for navigational incidents and near misses;
- Details of any pending and actual enforcement action in respect of any marine related incidents;

- Any other pertinent issues identified;
- Transport Audit Sheets; and
- Audit reports for the nature and quantity of all substances and objects deposited below MHWS.

The PC will provide these in:

- Daily logs and reports when construction activities are taking place on site / vessels;
- Weekly progress reports
- Monthly reports (additionally, confirming the status of the project, implementation of navigational / environmental commitments and mitigation measures, monthly and cumulative statistics, training delivered, environmental initiatives undertaken, amendments to the any of the consents related documents).

3.7.1 External Communication

The Marine Coordinator is responsible for:

- Documenting, issuing, communicating and responding to statutory navigation notices for the Development; and
- Emergency Response Co-operation Procedures are in place for such events. The communication and reporting protocols for such an event can be found in the Emergency Response Co-operation Plan (Section 12).

The ECoW is responsible for:

- Notification to the licensing authority detailed in the consent condition;
- Reporting monthly to the licensing authority once works have commenced with:
 - Details of audits and inspections;
 - o Details and statistics for incidents and near misses;
 - Details of any pending and actual enforcement action in respect of any incidents;
 - Any other pertinent issues identified;
 - Transport Audit Sheets; and
 - Audit reports for the nature and quantity of all substances and objects deposited below MHWS.
- Meeting with the licensing authority and statutory agencies and the local community; and
- Receiving, documenting and responding to any environmental communication from third parties.

3.8 Training

The purpose of marine training is to ensure that all site personnel have the knowledge to successfully implement the requirements of the project and remain safe on any marine asset.

In order to ensure that the environmental mitigation measures are implemented on site, the following environmental training Table 3 in will be required.

Training	Target Persons
Vessel Safety Induction covering emergency procedures, action in event of man overboard, fire and abandonment procedures.	Personnel working aboard any marine asset
Induction (which will include and environmental aspects (environmental sensitivities and controls, pollution prevention, waste management, emergency preparedness and response and shipboard operations under STCW requirements)	All persons attending Site / Vessel (Site / Vessel personnel, contractors on Site / Vessel, and visitors)
Toolbox Talks	Toolbox talks will be carried out prior to undertaking any activity. All persons carrying out work on site (site personnel, contractors on site) shall attend
Environmental Bulletins / Legislation Briefings / Best Practice Briefings	All persons carrying out work on Site / Vessel (Site / Vessel personnel, contractors on Site / Vessel) shall attend.
 Job specific training e.g. IOSH Working with Environmental Responsibilities / IOSH Managing Environmental Responsibilities. Use of Pollution Prevention Equipment. Site Waste Management. 	As identified for personnel with environmental responsibilities
 Project specific information, including relevant elements of: the EMP, CMS, NSP, VMP Consent Conditions 	Briefed out and available for reference to all Site / Vessel staff.

Table 3 Training

Any person working on the Site / Vessel will be competent and trained sufficiently to undertake their work in a safe and efficient manner. Each Contractor will ensure that their personnel maintain the necessary level of competence for their work & will maintain the training records on site & make them available for review and audit. Records of training will be maintained and made available for inspection.

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4 METHOD STATEMENT AND PROGRAMME

The full HDD Marine Works method and programme can be found in the Construction Method Statement (MEY-1A-40-HSE-001-D-ConstructionMethodStatementHDD).

4.1 HDD Marine Works Summary

HDD Marine Works will be set out for the following 4 dives at the HDD exit point (location, see Figure 3):

- 1) Identifying the exit point of the 4 x HDD bores on the seabed;
- 2) Cut the 'bullnose' from the HDD liner;
- 3) Connecting and disconnecting equipment to the drill string to clean and prove the HDD liner; and
- 4) Fit a seal to the end of the HDD liner to prevent debris entering.

The 4 dives are likely to take place in 2 mobilisation per HDD bore.

The dive operations will take place from a multicat vessel on a 4 point mooring system. The mooring system will be deployed in the operation for HDD bore 1 and remain in-situ until HDD bore 4 operations are complete, upon which it will be removed. Details of the navigation safety measures are included in this document.

The dive activities to be executed in the HDD Marine Works are programmed to require a single day. The vessels will therefore mobilise to site in the morning of the activity and demobilise back to their home port within the same 24 hour period.

The HDD bores will be completed in sequence so the HDD Marine Works are separated by approximately 1 month (see Figure 2). This is dependent on the HDD bore drilling progress as well as having suitable weather and tide windows for the works.

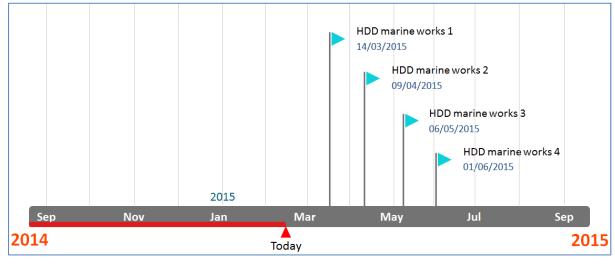


Figure 2 HDD Marine Works Programme

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5 NAVIGATIONAL SENSITIVITIES AND OTHER USERS

5.1 Navigational features

The Development is located in the Pentland Firth, which separates the Scottish mainland from the Orkney Islands, Figure 3. The Pentland Firth is well known as a challenging environment for mariners, with Admiralty Charts of the firth including general recommendations on navigation and more specific advice for laden tankers, due to strong tidal streams which give rise to eddies and races. The Development area lies outside of the worst of these, such as The Merry Men of Mey and The Swilkie.

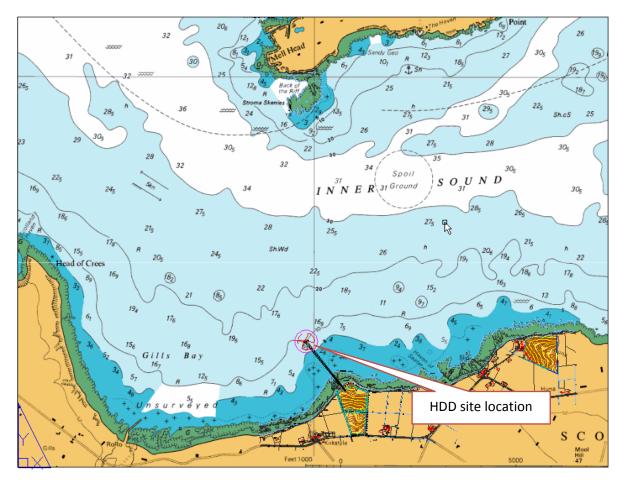


Figure 3 – HDD Marine Works Location

The Pentland Firth is divided into two passages by the island of Stroma. The principal and usual route through the firth by day and night, recommended for larger vessels, is the 2.5nm wide, deep and well-marked Outer Sound between Stroma and Swona. The Inner Sound between Stroma and the mainland is approximately 1.25nm wide, shallower, poorly marked, and its use by larger vessels is not recommended at any time, particularly in high winds or at night. However, it may be used by slow or smaller vessels with local knowledge in certain weather or in order to avoid proceeding against a stronger contrary stream in the Outer

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Sound.

Admiralty Sailing Directions suggest a mid-channel route through the Inner Sound when transiting with the tidal stream. When heading eastbound against the stream, keeping close in to either Stroma or Gills Bay is recommended to take advantage of comparatively slack water either side of mid-channel. For the westbound passage against an east-going tidal stream, the track favours the mainland shore through Inner Sound. However, the directions state that the coast between Ness of Duncansby and Gills Bay should not be approached too closely as it is generally poorly surveyed and in a number of places is fringed by dangerous or drying rocks.

5.1.1 Voluntary Reporting System

There is a voluntary reporting system in the Pentland Firth. Laden vessels should report to Aberdeen Coastguard on VHF Channel 16 at least 1h before ETA and on final departure of the Pentland Firth. This includes giving details on Name, Course, Speed, Draught and Destination.

5.2 Vessel movements

A combined dataset of 16 weeks seasonally and tidally weighted AIS survey data from 2010 -2011 was used for the baseline shipping analysis. This exceeded the minimum required by MCA MGN 371 of 4 weeks in order to provide a comprehensive picture of the traffic in the Inner Sound.

This was analysed for the Development area and its surroundings, covering both the Inner and Outer Sounds. A plot of ship tracks recorded during the survey period, colour-coded by vessel type, is presented in Figure 44. An illustration of the relative traffic density within the area is presented in Figure 55 based on the combined AIS track data. Key features are:

• The Pentalina ferry, operated by Pentland Ferries between Gills Bay and Saint Margaret's Hope with three return trips per day. A combined plot of all the Pentalina tracks over the 16 weeks is presented in Figure 66. Pentland Ferries still operate the 3 return trips per day.

In easterlies the ferry will tend to pass west of Stroma whilst in westerlies the route east of Stroma is preferred.

- Consistently heavy east-west traffic via the Outer Sound between the islands of Stroma and Swona. The number of vessels using the Outer Sound averaged 14 per day,
- The east-west traffic transiting the Inner Sound is low-to-moderate by comparison, averaging less than 1 vessel per day (approx. 4% of the Outer Sound traffic). The sizes of vessels in the Inner Sound also tended to be smaller.
- In total, 43 different vessels were recorded using the Inner Sound making a total of 63 transits (average of 1 transit every 2 days). The number of vessels varied slightly between the periods with marginally more traffic in winter.

- A number of these same vessels were also recorded using the Outer Sound during the survey, which suggests vessels can use both channels, although their choice is likely to depend on weather, tides and departure / destination ports.
- A total of 29 of the 63 vessels were broadcasting their draught on AIS. The draughts of a further 23 vessels were conservatively estimated based on researching their maximum draught or depth. A combined plot of the transiting traffic by draught is presented in Figure 7 and Figure 8. Draughts for 62 of the 63 vessels have therefore been ascertained.

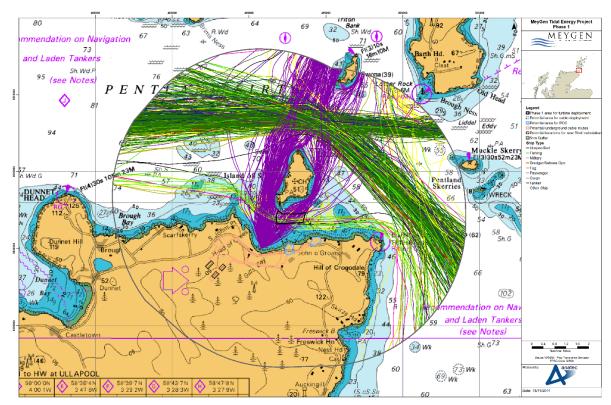
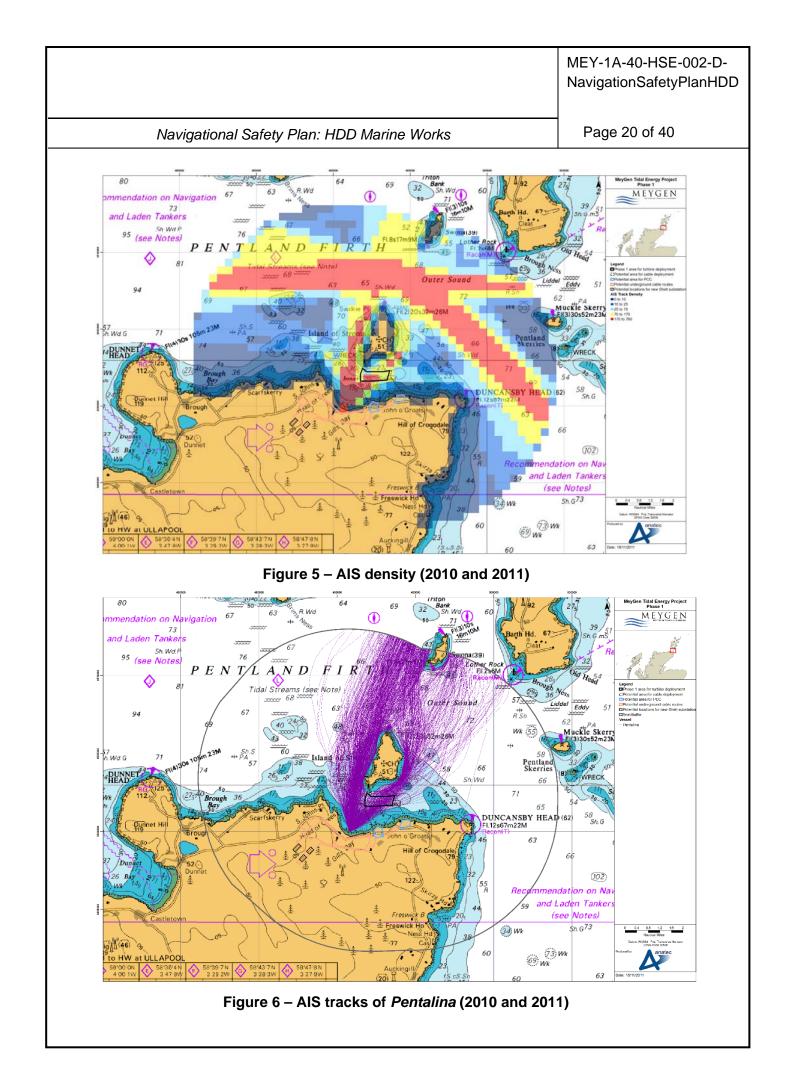
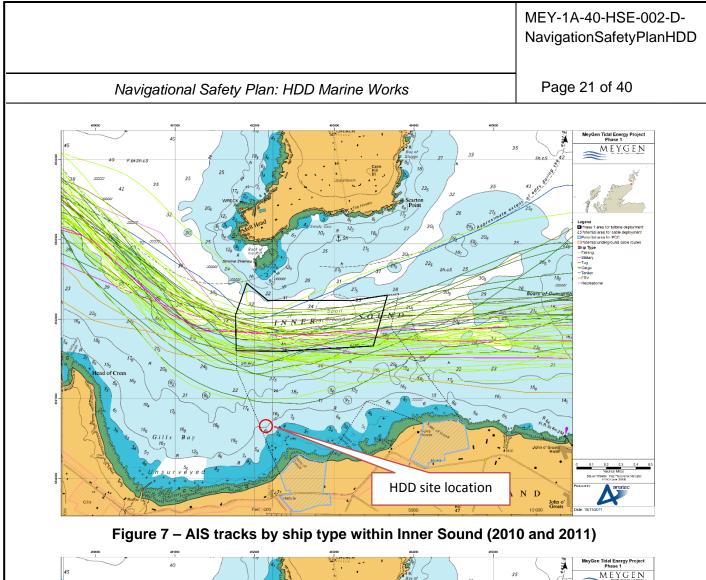
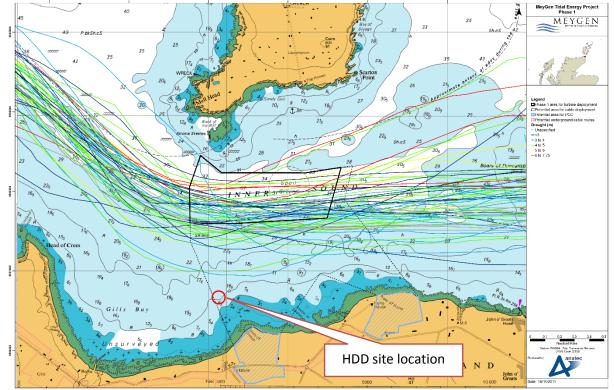
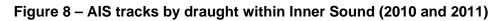


Figure 4 – AIS tracks by ship type within 5nm of the Development (Summer, 2011)









6 MEYGEN LTD. COMMITMENTS AND LEGISLATIVE COMMITMENTS

This section will provide an overview of the commitments made for navigation in the ES and SEIS and legislative and consenting requirements.

6.1 Environmental Statement and Supplementary Environmental Information Statement

A number of impacts were considered within the ES and mitigations identified for the construction phase. These are listed below in Table 4 with the mitigating actions proposed.

ES Mitigation	NSP Reference
Collision risk with work vessel	
Marine Safety Information broadcasts will be issued by HM Coastguard to inform mariners of the activity at the Development area (8 broadcasts per day covering Fair Isle, Cromarty and Hebrides Areas).	Section 9
The Development area will be issued as a temporary chart correction during the construction phase to be issued as a permanent correction and depicted on Admiralty Charts produced by the UKHO. This amendment will be via the existing Notice to Mariners and include standard chart markings.	Section 9
Navtex and Notices to Mariners will be issued including details of the MeyGen work	Section 9
Information on the work activity at the site will be circulated directly to local ports, ferry operators (e.g., Pentland Ferries), fishermen and recreational clubs.	Section 9
Details of the Development will be included in updated Kingfisher fishermen's awareness charts and FishSAFE.	Section 9
Details of the Development will be included in updated Sailing Directions.	Section 9
There will be liaison with local Harbour Masters to ensure they are aware of the activity and can notify visitors to their port.	Section 9
A working VHF channel will be provided to local users.	Section 9
Safety zone of appropriate dimensions will be applied for to protect working vessels on the site when restricted in ability to manoeuvre	Section 8
Operating procedures will be established to ensure work vessels do not block the channel when they are not actively working on the site. If it is not practicable for the work vessel to depart from the site they will use AIS and marks to indicate that any safety zone is not operational if they are not restricted in manoeuvrability.	Section 9 & 10
Collision risk management procedures will be developed to be used by working vessels specifying traffic monitoring and emergency response procedures.	Section 9 &12

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An Emergency Response Cooperation Plan (ERCoP) will be prepared for the Development incorporating the guidance provided in MGN 371. This will be submitted to the MCA for comment and approval.	Section 12
There will be a dedicated watchkeeper onboard working vessel(s)	Section 3
Local harbours will be used for the work where practicable.	Vessel Management Plan
Traffic re-routeing due to work vessels and associated safety zones	
Further consultation will be carried out on the safety zone dimensions with Marine Scotland, the MCA, DECC, the appointed contractor and local stakeholders prior to the application being made to DECC.	Section 8
Safety zones will be established on a 'rolling' basis, covering only the area of the site in which activity is taking place at a given time. Once that activity has been completed in that specific location, the safety zone will then 'roll on' to cover the next specific location (not the whole Development area).	Section 8
Work vessels will indicate their status on AIS and using appropriate marks/lights, e.g., if restricted in manoeuvrability. This will signify to passing traffic whether a Safety Zones is in place or not.	Section 11
Working vessel gets into difficulty	•
Working vessels are selected and audited based on suitability for the job and the conditions in the Pentland Firth.	Section 3
Marine operating procedures are developed specifying allowable wave, tide and weather criteria.	Construction Method Statement
Procedures specify that work vessels should seek shelter (or return to base) when not working at the site.	Vessel Management Plan
Working personnel are trained in offshore survival and have suitable Personal Protective Equipment (PPE).	Section 3
The Construction company operates a Safety Management System.	Section 3
Passage plans are developed for vessels routeing between the Development area and the onshore base.	Vessel Management Plan
	+

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e.g., on AIS and reporting via VHF.	Coordinator
An Emergency Response Cooperation Plan (ERCoP) will be prepared for the Development following the template provided by the MCA in MGN 371. This will be submitted to the MCA for comment and approval.	Section 12

Table 4 ES Construction mitigation

6.2 Safety Management Systems

The NSP complies with the Principal Contractor's Construction Phase Health and Safety Plan (under the Construction (Design and Management) Regulations 2007) and their Health, Safety and Environment Manual.

6.3 Consent Conditions

A list of further commitments required by the Conditions of the S.36 consent and Marine Licence, relevant to the HDD Marine Works, are in Table 5. The NSP is part of suite of consent related documents. A full list of the S36 and Marine Licence conditions can be found in the EMP.

The NSP sets out the safe navigation systems that will in used in carrying out the HDD Marine Works as detailed in the CMS. CMS for the HDD Marine Works also complies with the procedures set out in the EMP and VMP. Each of these documents is consistent with each other.

Con	Condition summary	Document	Responsible for Notification
S36 9	-	Construction Method Statement	
S36 10	ECoW	N/A	
S36 11	-	Environmental Management Plan	
S36 12	-	Project Environmental Monitoring Programme	
S36 13	-	Advisory Group	
S36 14	-	Vessel Management Plan	
S36 15	-	Operations and Maintenance Plan	
S36 16	Reporting Protocol for the Discovery of Marine Archaeology	Environmental Management Plan	
S36 17	-	Navigation Safety Plan	

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ML 3.1.3	Notification of Vessels	Construction Method Statement / Vessel Management Plan	ECoW
ML 3.2.1.3	Marine Pollution Contingency Plan	Environmental Management Plan	
ML 3.2.1.4	Notification of Commencement	Construction Method Statement	ECoW
ML 3.2.1.5	ECoW	N/A	
ML 3.2.1.6	Promulgation of navigation warnings	Navigation Safety Plan	
ML 3.2.1.7	Marine Mammal Observer	Environmental Management Plan	
ML 3.2.2.1	Transport Audit Sheets	Construction Methods Statement	ECoW
ML 3.2.2.2	Notification of Deposits	Construction Methods Statement	ECoW

Table 5 Other consent requirements

6.4 Legal Requirements, Licences and Guidance notes

The NSP has been developed with due consideration of the following legislation:

- a) Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs)
- b) UK Merchant Shipping Act 1995
- c) UK Maritime H&S Regulations
- d) International Convention for the Safety of Life at Sea (SOLAS), 1974
- e) MGN 371 Offshore renewable energy installations (OREIs)
- f) Offshore Wind and Marine Energy Health and Safety Guidelines, UK Renewables

Where practicable and relevant, the NSP will be influenced by the MGN 371 guidance and industry best-practice, including the development of an Emergency Response Co-operation Plan (ERCoP) pre-construction and in collaboration with the nearby offshore operators, it is considered that Search and Rescue issues can be well managed.

7 NAVIGATIONAL SAFETY MEASURES

Measure put in place to ensure the Navigational safety of the HDD Marine Works will

include:

- Notice to Mariners;
- Radio navigation warnings;
- Dedicated watchkeeper;
- Temporary construction lighting and marking; and
- Emergency Response Co-operation Plan
- Selection of well found and competently managed work vessels

These measures will be adopted in consideration of the COLREGS and the guidance of MGN 371.

8 CONSTRUCTION SAFETY ZONES

The HDD Marine Works will not specify a safety zone, but the vessel will request marine traffic to provide the region a suitably wide berth as there will have divers operating in the water (Figure 3).

The 4 point mooring system will have a radius of 75m with the vessel located close to the centre of the mooring spread (Figure 9).

- The Notice to Mariners will include details of the Marine Works Locations, allencompassing dates and request the area is given a suitable wide berth.
- Navigation warnings issued via the 'Navtex' system.
- Radio warnings will be given every 3 hours by coast radio stations.
- "Securitee" message broadcast at commencement, during, and on completion of daily activities.
- Vessels involved will be keeping continuous listening watch on Channel 16 and will display appropriate lights and marks as required by the International Rules for Preventing Collisions at Sea.

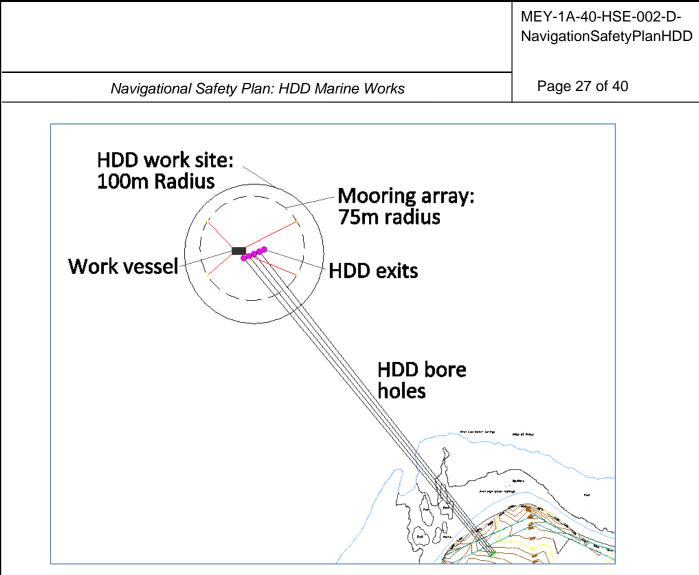


Figure 9 – HDD exit works site layout

9 NOTICE (S) TO MARINERS AND RADIO NAVIGATION WARNINGS

Notice to Mariners (Ntm's) will be issued stating:

- Contractor undertaking works and Contractor contact details
- Position, date and duration of works
- Vessels
- Buoyage and marking
- Specific navigation information and planned communication / warnings
- Seabed hazards that remain post operation

A sample NtM is included in Appendix A. NtM's will be sent to the following list in Table 6, including national and local stakeholders.

Contact	Email
UKHO	hdcfiles@ukho.gov.uk

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UKHO	navwarnings@btconnect.com
UKHO	sdr@ukho.gov.uk
HM Coastguard Shetland Maritime Rescue	wm.shetland@mcga.gov.uk
Co-ordination Centre	
Marine Scotland Licensing Operations Team	ms.marinelicensing@scotland.gsi.gov.uk
Pentland Ferries	kbanks@pentlandferries.co.uk
Scrabster Harbour	gordon.mackenzie@scrabster.co.uk
Wick Harbour	malcolm.bremner@wickharbour.co.uk
Gills Bay Harbour	b_mowat@yahoo.co.uk
Orkney Island Council Marine Services	harbours@orkney.gov.uk
Northlink Ferries	kris.bevan@northlinkferries.co.uk
Scottish Fishermen's Federation	sff@sff.co.uk
Orkney Fishermen's Society	stewart@ofsorkney.co.uk
Orkney Fisheries Association	orkneyfisheries@btconnect.com
Scottish Pelagic Fishermen's Association	ian.gatt@scottishpelagic.co.uk
Royal Yachting Association	admin@ryascotland.org.uk
Holy Loch Port	info@holylochport.co.uk
Pentland Canoe Club	secretary@pentlandcanoeclub.org.uk
Caithness Canoe Club	bill.ros1@btopenworld.com
James Fisher Marine Services	i.sargent@james-fisher.co.uk
James Fisher Marine Services	a.heslop@james-fisher.co.uk
James Fisher Marine Services	t.blackshaw@james-fisher.co.uk
MeyGen Ltd.	fraser.johnson@meygen.com
MeyGen Ltd.	david.collier@meygen.com
MeyGen Ltd.	eddie.scott@meygen.com
MeyGen Ltd.	Ed.rollings@meygen.com

Table 6 NtM Contacts

9.1 Frequency of Notice to Mariners

NtM's will be issued a minimum of 2 weeks prior to commencement of the works.

9.2 Frequency and Approach to Radio Navigation Warning

Navigation warnings will be promulgated using the GMDSS "Navtex" system which will be available to commercial vessels and some trawlers and leisure vessels.

Radio navigation warnings will be issued every 3 hours. By coast radio stations. These will be readily accessible to any vessel with an operable VHF station.

The primary, or a designated, work vessel will broadcast "Securitee" messages by VHF at commencement to works, during (houly) and at completion of daily activities. These messages will be readily accessible to any vessel with an operable VHF station.

Vessels involved will be keeping continuous listening watch on Channel 16 and have a working channel pre-determined for general communications.

Vessels will display appropriate lights and marks as required by the International Rules for Preventing Collisions at Sea.

9.3 Temporary Chart Markings

The UKHO will be notified of the Development and request to issue a temporary chart correction for the HDD Marine Works area. This will be requested prior to the execution of the main construction works.

On completion of works a formal correction will be presented to UKHO for the permanent update of charts indicating sub-sea structure positions.

10 ANCHORING AREAS

The HDD Marine Works are in an area of low tidal flows in the Inner Sound, the works will use a Multicat vessel and 4 point mooring whilst carrying out the diving operations.

It is not intended that any vessels would anchor near to the HDD Marine Works site for any other reason than to carry out the dive operations.

Gills Bay (1.6km) will be used as a safe haven if necessary (see VMP).

11 TEMPORARY CONSTRUCTION LIGHTING AND MARKING

A construction site for the HDD Marine Works will be specified around the site to ensure the safety of the vessel secured within the temporary moorings and the divers operating on the seabed.

Works will only be undertaken during daylight hours, however under Colregs lights and shapes must be displayed from sunset to sunrise and at any other time deemed necessary therefore the vessel will be showing appropriate day signals and lights as required:

For a Vessel Resticted in Their Ability to Manoeuver:

By day shapes consisting of a ball / diamond/ ball where it can best be seen, and if required all-round lights being Red/White/Red where they can best be seen.

In addition when at anchor a ball in the forepart of the vessel and if required anchor lights for a vessel of her size.

Additionally the following Interco signals may be flown

• Flag - Romeo / Yankee: You should proceed at slow speed when passing me



Flag- Alpha: I have a diver down, please pass well clear at slow speed.



The 4 point mooring array will use surface floats atop each of the temporary anchors. These will be lit as special mark, with suitable day mark and light, the nature of these will be specified in the NtM related to these works. The light sequences will be confirmed in association with the Northern Lighthouse Board.

12 EMERGENCY RESPONSE

Three levels of emergency response planning exists within the control and management of the HDD Marine Works:

12.1 Vessel Operations

Emergency response procedures are listed within the Method Statement within which the detailed means of executing the works is included. These procedures include:

- Man Overboard
- General MOB Procedure
- Fire & Explosion
- Personnel Injury or Medical Evacuation
- Serious Injury or Illness
- Medical Advice
- Request for medical assistance
- Evacuation of a sick or injured person from a vessel
- Adverse Weather Procedure
- Environmental Response Plan
- Clean up actions specific to hazardous materials
- Spill Notification
- Spill Documentation
- Immediate actions
- Clean-up actions
- Spill notification
- Spill Documentation
- Location and Content of a Spill Kit
- Post incident reporting
- Training

12.2 Principal Contractor

An ERCoP will be generated by the Principal Contractor to cover the HDD Marine Works in relation to the Development site. This document will be generated considerate of MGN 371 and issued a minimum of 2 weeks prior to the commencement of the works.

The ERCoP will be most the following relevant standards to take account:

- MGN 371 (M+F) Offshore Renewable Energy Installations Guidance on UK Navigational Practice, Safety and Emergency Response Issues
- MGN 372 (M+F) Offshore Renewable Energy Installations (OREIs): Guidance to Mariners Operating in the Vicinity of UK OREIs

Principal contacts for the ERCoP are in Table 7.

Organisation	Name	Role	Telephone	Mobile
James Fisher Marine Services	lan Sargent	Project Manager	+44 1565658812	
James Fisher Marine Services	Stan Groundwater	Marine Coordinator	+44 1565658824	
James Fisher Marine Services	Tony Blackshaw	HSE Advisor	+44 1565658817	
MeyGen Ltd	Ed Rollings	ECoW	+44 1316599662	
MeyGen Ltd	Fraser Johnson	Marine Package Manager	+441316599672	
Maritime and Coastguard Agency	-	Shetland Maritime Rescue Co- ordination Centre	+441595 692976	-
Marine Scotland		Marine Scotland Duty Officer	0300 244 4000	-
SEPA Hotline	-	-	0800 80 70 60	-
Marine Accident Investigation Branch	-	-	023 8023 2527	-

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Health and Safety Executive	-	-	Incidents are reported online at <u>http://www.hse.gov.uk/riddor/report.htm</u>
Executive			

Table 7 ERCoP contacts

12.3 MeyGen Ltd.

Atlantis Resources Ltd. (the majority shareholder of MeyGen Ltd.) has an Emergency Response Plan. The purpose of this document is to provide the management team of Atlantis with a clear and concise procedure to follow in the case of an emergency situation at any of the premises or sites under their control during the design, manufacture, transportation, installation, commissioning, operation, maintenance and eventual decommissioning of any tidal turbine device, power evacuation equipment, power generation equipment, or testing and commissioning equipment under their control.

13 BUOYAGE

The HDD Marine Works require a 4 point mooring system for the multicat vessel. The moorings will be laid on the marine works for HDD 1. These will remain in place until the completion of marine works for HDD 4. The vessel will mobilise and demobilise from these morning for each dive operation in between. The moorings will be marked with as per Section 11. For more details of the construction methods for the HDD Marine Works see the CMS.

14 NSP REVIEW AND CONSULTATION

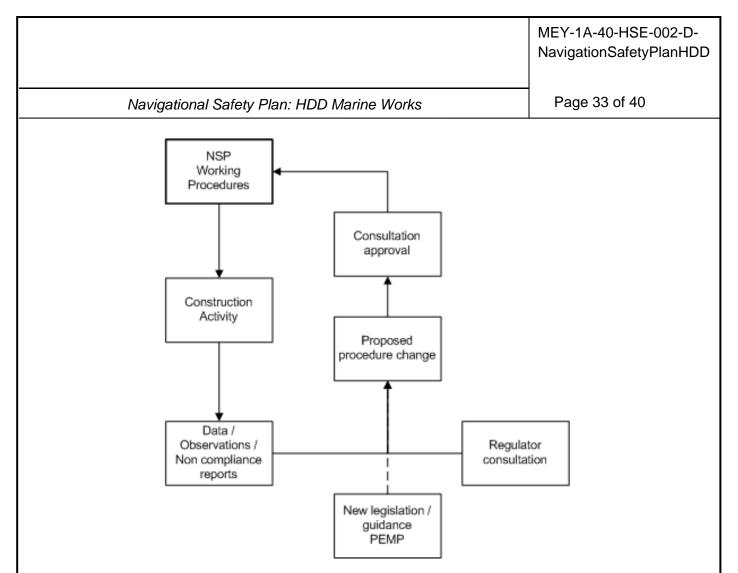
Under Condition 17 of the Section 36 the NSP will be reviewed and commented on by the licensing authority, SNH, and any other such ecological or other advisors that may be required at the discretion of the Scottish Ministers. The NSP must be approved by the licensing authority.

The NSP will be submitted to the licensing authority for distribution to the stakeholders and for approval.

Subsequent versions of the NSP will be submitted for the Construction Works to include procedures for turbine, foundation and cable installation.

Any changes to the NSP deemed necessary (working methods or procedures) must be reviewed and approved by the ECoW before it is submitted for approval to the licensing authority (Figure 10).

Version control will be conducted by the revision review block on the front page of the NSP..





15 REFERENCES

Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREGs)

UK Merchant Shipping Act 1995

UK Maritime H&S Regulations

International Convention for the Safety of Life at Sea (SOLAS), 1974

MGN 371 (M+F) Offshore Renewable Energy Installations Guidance on UK Navigational Practice, Safety and Emergency Response Issues

MGN 372 (M+F) Offshore Renewable Energy Installations (OREIs): Guidance to Mariners Operating in the Vicinity of UK OREIs

Offshore Wind and Marine Energy Health and Safety Guidelines, UK Renewables

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16 LIST OF ABBREVIATIONS

Abbreviation	
CDM	Construction (Design and Management) Regulations 2007
CMS	Construction Method Statement
COSHH	Control of Substance Hazardous to Health
ECoW	Ecological Clerk of Works
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERCoP	Emergency Response Co-operation Plan
ERP	Emergency Response Procedures
EPS	Europena Protected Species
ES	Environmental Statement
HDD	Horizontal Directional Drilling
HSE	Health, Safety and Environment
IOSH	Institute of Occupational Safety and Health
JNCC	Joint Nature Conservation Committee
NSP	Navigation Safety Plan
MCA	Maritime and Coastguard Agency
MHWS	Mean High Water Springs
ML	Marine Licence under the Marine (Sotland) Act 2010
MLWS	Mean Low Water Springs
ММО	Marine Mammal Observer
PC	Principal Contractor – James Fisher Marine Services

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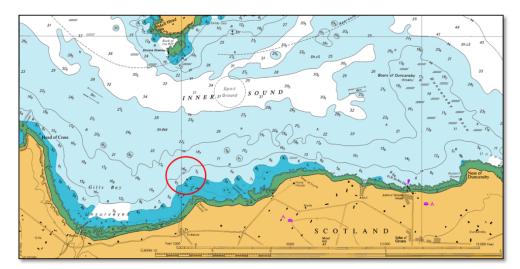
PEMP	Project Environmental Monitoring Programme	
RAMS	Risk Assessments and Method Statements	
SAC	Special Area of Conservation	
SCIMS	Seal Corkscrew Injury Monitoring Scheme	
SEIS	Supplementary Environmental Information Statement	
SEPA	Scottish Environment Protection Agency	
SHESQ	Safety, Health, Environment, Security and Quality	
SNCA	Statutory Nature Conservation Agency	
SNH	Scottish Natural Heritage	
SPA	Special Protected Area	
STCW	International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978	
S36	Section 36 of the Electricity Act 1989	
TSC	Turbine Submarine Cable	
TSS	Turbine Support Structure	
TTG	Tidal Turbine Generator	
UKHO	United Kingdom Hydrographic Office	
VMP	Vessel Management Plan	

		MEY-1A-40-HSE-002-I NavigationSafetyPlanF
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APPENDIX A - EXAMPLE NOT	ICE TO MARINERS	
Not	ice to Mariners	5
Marit	ime Safety Informatior	N
James Fisher Marine Services	Stan Groundwater	
Booths Park House		
Chelford Road	s.groundwater@james	-fisher.co.uk
Knutsford		
Cheshire	tel 01856831380	
WA16 8WZ		
Work shall be undertaken by:	Leask Marine Limited	
Tel No. 01856 874 725		25
	Mob	
	Email operations@I	leaskmarine.com
All positions to be quoted in Wor deg./ minutes. & 3 decimal places Works schedule and purpose	-	[WGS84], lat. / long., in
Date/s: xx/xx/2015 – xx/xx/2015		
Diving operations will be undertaker will deploy cameras suspended belo Vessel/s onsite		s, out with that time C-Salvor
MV C-Salvor		

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Further information

Fig1 Area of operations site map



International Rules for Preventing Collisions at Sea.

Mariners are requested to give the works a wide berth

Fig2 C-Salvor for visual identification purposes.

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Name	Stan Groundwater	Signature	JSG	Date	19/12/2014

Promulgation List			
Contact	Email		
UKHO	hdcfiles@ukho.gov.uk		
UKHO	navwarnings@btconnect.com		
UKHO	sdr@ukho.gov.uk		
HM Coastguard Shetland Maritime Rescue	wm.shetland@mcga.gov.uk		
Co-ordination Centre			
Marine Scotland Licensing Operations Team	ms.marinelicensing@scotland.gsi.gov.uk		
Pentland Ferries	kbanks@pentlandferries.co.uk		
Scrabster Harbour	gordon.mackenzie@scrabster.co.uk		
Wick Harbour	malcolm.bremner@wickharbour.co.uk		
Gills Bay Harbour	b mowat@yahoo.co.uk		
Orkney Island Council Marine Services	harbours@orkney.gov.uk		
Northlink Ferries	kris.bevan@northlinkferries.co.uk		
Scottish Fishermen's Federation	sff@sff.co.uk		
Orkney Fishermen's Society	stewart@ofsorkney.co.uk		
Orkney Fisheries Association	orkneyfisheries@btconnect.com		
Scottish Pelagic Fishermen's Association	ian.gatt@scottishpelagic.co.uk		
Royal Yachting Association	admin@ryascotland.org.uk		

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Holy Loop Port	infa@balulaabnart.aa.uk
Holy Loch Port	info@holylochport.co.uk
Pentland Canoe Club	secretary@pentlandcanoeclub.org.uk
Caithness Canoe Club	bill.ros1@btopenworld.com
James Fisher Marine Services	i.sargent@james-fisher.co.uk
James Fisher Marine Services	a.heslop@james-fisher.co.uk
James Fisher Marine Services	t.blackshaw@james-fisher.co.uk
MeyGen Ltd.	fraser.johnson@meygen.com
MeyGen Ltd.	david.collier@meygen.com
MeyGen Ltd.	eddie.scott@meygen.com
MeyGen Ltd.	Ed.rollings@meygen.com