



MORAY EAST

OFFSHORE WINDFARM

Operation and Maintenance Programme

Moray East Offshore Transmission Infrastructure

June 2021

Moray Offshore Windfarm (East) Limited

Produced by Moray Offshore WindFarm (East) Limited	
Produced by	Gary MCGougan
Document Status	Draft 8
Version	2
Document Purpose	To meet the requirements of condition 3.2.3.2 and 3.1.1 of the Offshore Transmission Infrastructure and OSP Marine Licences respectively for the Moray East Offshore Wind Farm
File Name	846001-PCA0030-MWE-REP-002
Date	07 June 2021

Version	Date	Summary of Changes
1	13/01/2021	For submission to MS-LOT
2	07/06/2021	For submission to MS-LOT following response to stakeholder comments

Review / Approval

Moray East Ecological Clerk of Works	Legal Review
Richard Stocks [Royal HaskoningDHV]	Colin Innes [Sheppard and Wedderburn]

Moray East	
Paul Mewse [Head of Operations and Maintenance]	Dan Finch [Operational Director]

© Moray Offshore Windfarm (East) Limited 2021

This document contains proprietary information which belongs to Moray Offshore Windfarm (East) Limited and / or affiliated companies and shall be used only for the purpose for which it is supplied. Moray Offshore Windfarm (East) Limited shall have no liability for any loss, damage, injury, claim, expense, cost or other consequence arising as a result of use or reliance upon any information contained in or this document where it is not used the purpose for which it is supplied.

Table of Contents

List of Abbreviations.....	5
Definitions	7
Executive Summary	10
1 Introduction.....	11
1.1 Background	11
1.2 Objectives of this Document	11
1.3 Scope of the OMP	13
1.4 Guidance and Methodology.....	13
1.5 Links with Other Consent Plans.....	14
1.6 OMP Document Structure.....	17
2 Moray East Statement of Compliance.....	18
2.1 Introduction	18
2.2 Statement of Compliance.....	18
2.3 Legislative Requirements	18
2.4 Key Roles and Responsibilities under the Plan	19
3 Updates and Amendments to this OMP	20
4 Development Overview.....	22
4.1 OfTI Assets.....	23
4.2 Supervisory Control and Data Acquisition System.....	25
5 Approach to Health, Safety and the Environment and Good Practices	26
5.1 Asset Management System.....	27
5.2 Environmental Management	27
6 Environmental Sensitivities and Good Working Practices	28
6.1 Waste Management.....	28
6.2 Environmental Sensitivities	28
7 Communications and Reporting.....	30
7.1 Communications	30
7.2 Incident Response and Reporting	30
7.3 Other Reporting and Notification Requirements.....	30
8 OfTI Operation and Maintenance Activities.....	33
8.1 Maintenance Requirements.....	33
8.2 Maintenance Schedule for Routine Service Activities	35
8.3 Unscheduled Activities	35
8.4 Major Component Repairs	35
9 Compliance with the Application and ES.....	36

10	References	37
----	------------------	----

List of Figures

Figure 1-1 Active Consent Plans throughout the construction and operational phases (plan abbreviations are included in Abbreviations section upfront).....	16
Figure 3-1 Change Management Procedure	21
Figure 4-1: Moray East Offshore Wind Farm and OfTI (the Development) Location.....	23
Figure 4-2 Offshore Substation Platforms (OSPs) and Offshore Export Cables (OECs) Layout within the Wind Farm	24
Figure 4-3 Export Cable Layout within the OfTI Corridor	25

List of Tables

Table 1-1: Consent Conditions.....	12
Table 1-2: Consent conditions to be discharged and reference sections	14
Table 1-3: Document Structure	17
Table 2-1 Key Roles and Responsibilities under the Plan	19
Table 6-1: Environmental sensitivities associated with O&M activities as assessed within the ES.....	28
Table 7-1 Other reporting and notification requirements	30
Table 8-1 Schedule of O&M activities	33

List of Abbreviations

AC	Alternating Current
AMS	Asset Management System
CaP	Cable Plan
CFMS	Commercial Fisheries Mitigation Strategy
CoP	Construction Programme
CMMS	Computerised Maintenance Management System
CMS	Construction Method Statement
CTV	Crew Transfer Vessel
DP	Decommissioning Programme
DSLp	Development Specification and Layout Plan
EDA	Eastern Development Area
EMP	Environmental Management Plan
EMS	Environmental Management System
ERCoP	Emergency Response and Cooperation Plan
ES	Environmental Statement
FLO	Fisheries Liaison Officer
HSE	Health, Safety and Environment
HV	High voltage
IAC	Inter-Array Cable
JNCC	Joint Nature Conservation Committee
KPIs	Key Performance Indicators
kV	Kilovolt
LMP	Lighting and Marking Plan
MARP	Marine Archaeological Reporting Protocol
MCA	Maritime and Coastguard Agency
MCC	Marine Coordination Centre
MINNS	Marine Invasive Non-Native Species
Moray East	Moray East Offshore Windfarm (East) Limited
MPCP	Marine Pollution Contingency Plan

MS-LOT	Marine Scotland Licensing Operations Team
MV	Medium Voltage
NLB	Northern Lighthouse Board
NSP	Navigational Safety Plan
O&M	Operation and Maintenance
OEC	Offshore Export Cables
OfTI	Offshore Transmission Infrastructure
OfTO	Offshore Transmission Operator
OMP	Offshore Maintenance Programme
OSP	Offshore Substation Platform
PEMP	Project Environmental Monitoring Plan
QHSE	Quality, Health, Safety and Environment
ROV	Remotely Operated Vehicle
RSPB	Royal Society for the Protection of Birds
SCADA	Supervisory Control and Data Acquisition
SEPA	Scottish Environment Protection agency
SNH	Scottish Natural Heritage
SOV	Service Operation Vessels
SRL	Safety Retracting Line
TEC	Transmission Entry Capacity
TI	Transmission Infrastructure
TPV	Third Party Verification
TRRMP	Television and Radio Reception Mitigation Plan
TTP	Traffic and Transportation Plan
VMP	Vessel Management Plan
WMP	Waste Management Plan
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator

Definitions

The following definitions have been used throughout this document with respect to the company, the consented wind farms and how these definitions have changed since submission of the Moray East Environmental Statement (ES) in 2012, the Moray East Modified Transmission Infrastructure ES in 2014 and the Moray East Offshore Substation Platform (OSP) Environmental Report in 2017.

- **Moray Offshore Windfarm (East) Limited (formerly known as Moray Offshore Renewables Limited)** – the legal entity submitting this document;
- **Moray East Offshore Wind Farm** - the wind farm to be developed in the Moray East site (also referred to as the Wind Farm);
- **The Moray East site** - the area in which the Moray East Offshore Wind Farm will be located. Section 36 Consents and associated Marine Licences to construct and operate up to three generating stations on the Moray East site were granted in March 2014. At that time the Moray East site was known as the “Eastern Development Area (EDA)” and was made up of three sites known as the Telford, Stevenson and MacColl offshore wind farm sites. The Section 36 Consents and Marine Licences were subsequently varied in March 2018, with the Marine Licences additionally varied in July 2019, April 2020 and October (MacColl)/November (Telford and Stevenson) 2020;
- **Telford, Stevenson and MacColl wind farms** – these names refer to the three consented offshore wind farm sites located within the Moray East site;
- **Transmission Infrastructure (TI)** - includes both offshore and onshore electricity TI for the consented Telford, Stevenson and MacColl wind farms. Includes connection to the national electricity transmission system near New Deer in Aberdeenshire encompassing Alternating Current (AC) OSPs, AC OSP interconnector cables, AC export cables offshore to landfall point at Inverboyndie continuing onshore to the AC collector station (onshore substation) and the additional regional Transmission Operator substation near New Deer. A Marine Licence for the offshore TI was granted in September 2014 (Modified Offshore Transmission Infrastructure (OfTI) Marine Licence) and a further Marine Licence for two additional distributed OSPs was granted in September 2017. Both Licences were subsequently varied in July 2019 and the Licence for the offshore TI was additionally varied in December 2020. The onshore TI was granted Planning Permission in Principle in September 2014 by Aberdeenshire Council and a Planning Permission in Principle under Section 42 in June 2015. In June 2018 Aberdeenshire Council granted Approval of Matters Specified in Conditions for both the cable route and substation;
- **Offshore Transmission Infrastructure (OfTI)** – the offshore elements of the TI comprising AC OSPs, OSP interconnector cables and AC export cables offshore to landfall (for the avoidance of doubts some elements of the OfTI will be installed in the Moray East site);
- **Moray East ES 2012** – the ES for the Telford, Stevenson and MacColl wind farms and Associated TI, submitted August 2012;
- **Moray East Modified TI ES 2014** – the ES for the TI works in respect to the Telford, Stevenson and MacColl wind farms, submitted June 2014;
- **Moray East OSP Environmental Report 2017** – the environmental report comprising of the “Statement Regarding Implications for the Modified TI ES 2014 and HRA”. The report was produced in support of the application submitted in May 2017 for the Moray East OSP Marine Licence;
- **The Development** – the Moray East Offshore Wind Farm and OfTI;
- **Design Envelope** - the range of design parameters used to inform the assessment of impacts;
- **OfTI Corridor** – the export cable route corridor, i.e. the OfTI area as assessed in the Moray East Modified TI ES 2014 excluding the Moray East site;

- **the Applications** – (1) the Application letters and ES submitted to the Scottish Ministers on behalf of Telford Offshore Windfarm Limited, Stevenson Offshore Windfarm Limited and MacColl Offshore Windfarm Limited, on 2 August 2012 and the Additional Ornithology Information submitted to the Scottish Ministers by Moray Offshore Renewables Limited on the 17 June 2013; (2) the Section 36 Consents Variation Application Report for Telford, Stevenson and MacColl Offshore Wind Farms dated December 2017 and (3) the Marine Licence Applications and associated documents submitted for the OfTI and OSP Licences in April 2014 and May 2017 respectively;
- **Interim Operations and Maintenance (O&M) Phase** – period between the commissioning of the first WTG or OSP and the full commissioning of the Wind Farm when there is a overlap between construction and operational activities;
- **Moray East Offshore Wind Farm Section 36 Consents and Marine Licences**– are comprised of the following:

Section 36 Consents:

- Section 36 consent for the Telford Offshore Wind Farm (as varied) – consent under Section 36 of the Electricity Act 1989 for the construction and operation of the Telford Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the Stevenson Offshore Wind Farm (as varied) – consent under Section 36 of the Electricity Act 1989 for the construction and operation of the Stevenson Offshore Wind Farm assigned to Moray East on 19 June 2018.
- Section 36 consent for the MacColl Offshore Wind Farm (as varied) – consent under Section 36 of the Electricity Act 1989 for the construction and operation of the MacColl Offshore Wind Farm assigned to Moray East on 19 June 2018.

Marine Licences

- Marine Licence for the Telford Offshore Wind Farm (as varied) – Licence Number: MS-00009051 (formerly 04629/20/0) – granted under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
 - Marine Licence for the Stevenson Offshore Wind Farm (as varied) – Licence Number: MS-00008985 (formerly 04627/20/0) – granted under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
 - Marine Licence for the MacColl Offshore Wind Farm (as varied) – Licence Number: MS-00008972 (formerly 04628/20/0) – granted under the Marine (Scotland) Act 2010 and Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area transferred to Moray East on 19 July 2018.
- **OfTI Licences** – are comprised of the following:
 - Marine Licence for the Offshore Transmission infrastructure – Licence Number MS-00008919 (formerly 05340/19/0) – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction works and deposits of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OfTI Marine Licence”)
 - Marine Licence for two additional distributed OSPs – Licence Number 06347/19/0 – granted under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 Marine Licensing for marine renewables construction, operation and maintenance

works and the deposit of substances or objects in the Scottish Marine Area and the United Kingdom Marine Licensing Area (referred to as the “OSP Marine Licence”)

Executive Summary

Moray East is a joint venture partnership between Ocean Winds Offshore, Diamond Generating Europe and China Three Gorges and has been established to develop, finance, construct, operate, maintain and decommission the Moray East Offshore Wind Farm.

The Moray East Offshore Wind Farm is located on the Smith Bank in the outer Moray Firth. It is situated 12 nautical miles (nm) (approx. 22 km) from the Caithness Coast, covers an area of 86 square nautical miles or 295 square km, and ranges from 37 - 57 m in water depth.

The Development will consist of 100 Wind Turbine Generators (WTGs), three Offshore Substation Platforms (OSPs), inter-array and interconnector cable circuits within the Wind Farm, and three offshore export cable circuits. The three export cable circuits run from the Moray East Wind Farm to a landfall location in Boyndie Bay on the Aberdeenshire Coast.

This Offshore Transmission Infrastructure (OfTI) Operation and Maintenance Programme (OMP) has been prepared to address the specific requirements of the relevant conditions attached to the OfTI Licences issued to Moray Offshore Windfarm (East) Limited (Moray East). The overall aim of this OfTI OMP is to set out the procedures and good working practices for the O&M activities of the OfTI assets to be applied during the operations of the Moray East wind farm. The OfTI assets will be sold to an Offshore Transmission Operator (OfTO) and thereafter the responsibility for the implementation of the OMP will transfer to the OfTO.

A separate OMP will be prepared for the wind farm assets.

Aside from the OfTI Marine Licences conditions, compliance of this OfTI OMP with the Application, and the Moray East ES 2012, has also been reviewed.

1 Introduction

1.1 Background

Moray East is a joint venture partnership between OceanWinds Offshore, Diamond Generating Europe and China Three Gorges and has been established to develop, finance, construct, operate, maintain and decommission the Moray East Offshore Wind Farm (Moray East).

The Moray East site is located on the Smith Bank in the outer Moray Firth. It is located 12 nautical miles (nm) (approx. 22 km) from the Caithness Coast, covers an area of 86 square nautical miles or 295 square km, and ranges from 37 - 57 m in water depth.

The Development will consist of 100 Wind Turbine Generators (WTGs), three Offshore Substation Platforms (OSPs), inter-array and interconnector cable circuits within the Wind Farm, and three offshore export cable circuits. The three export cable circuits run from the Moray East Wind Farm to a landfall location in Boyndie Bay on the Aberdeenshire Coast.

Section 36 Consents were granted in March 2014 for the construction and operation of three offshore wind farms (Telford, Stevenson and MacColl) within the Moray East site. Marine Licences for the three offshore wind farms were granted in September 2014 (together the Section 36 Consents and Marine Licences for the Wind Farm are referred to as the Moray East Offshore Wind Farm Consents). The Wind Farm Section 36 consents were varied in March 2018. The Marine Licences for Telford, Stevenson and MacColl were subsequently varied in July 2019, April, October (MacColl), and November (Telford and Stevenson) 2020.

A Marine Licence for the Modified Offshore Transmission Infrastructure (OfTI) was granted in September 2014, under the Marine (Scotland) Act 2010 & Marine and Coastal Access Act 2009, Part 4 marine licensing and subsequently varied in 2019 and December 2020 (Modified OfTI Licence), a Marine Licence for two additional distributed offshore substation platforms (OSPs) was granted in September 2017 and subsequently varied in July 2019 (together these are referred to as the OfTI Marine Licences).

1.2 Objectives of this Document

The OfTI Marine Licences contain a number of conditions that must be discharged through approval by the Scottish Ministers of specified plans and other matters throughout various stages pre-construction, construction, operation and maintenance of the wind farm. One such requirement of the OfTI Marine Licences is the approval of an Operation and Maintenance Programme (OMP), the purpose of which is to set out the procedures and good working practices for the Operation and Maintenance (O&M) activities of the OfTI assets (i.e. Offshore Substation Platforms (OSPs), excluding the 66 kV switchgear, OSP interconnector cables and the Offshore Export Cables (OECs)), to be submitted to the Scottish Ministers three months prior to the commissioning of the first OSP.

The relevant conditions setting out the requirement for an OMP approval, and which are to be discharged by this OMP, are set out in full in Table 1-1. Table 1-1 also references where the requirements of the consent conditions have been addressed in this OfTI OMP.

A separate OMP will be prepared for the wind farm assets.

Table 1-1: Consent Conditions

Consent Document	Condition Reference	Condition Text	Reference to relevant Section of the OMP
OfTI Marine Licence	3.2.3.2	Licensee must, no later than 3 months prior to the commissioning of the first OSP, submit an OMP, in writing, to the Licensing Authority for their written approval.	This document sets out the OMP for approval by the Scottish Ministers
		Such approval may only be granted following consultation by the Licensing Authority with the JNCC ¹ , SNH ² , SEPA, MCA, NLB, Aberdeenshire Council and any such other advisors or organisations as may be required at the discretion of the Licensing Authority.	Consultation to be undertaken by the Scottish Ministers
		The OMP must set out the procedures and good working practices for the operations and maintenance of the OSPs, substructures, and cable network of the Works.	Section 5 and Section 7 and Section 8
		Environmental sensitivities which may affect the timing of the operation and maintenance activities must be considered in the OMP.	Section 6
		The OMP must, so far as is reasonably practicable, be consistent with the EMP, the PEMP, the VMP, the NSP, the CaP and the LMP.	This document is consistent with the other plans.
	3.2.4.4	The Licensee must, at all times, operate the Works in accordance with the approved VMP, OMP, NSP, CaP, TTP and LMP (as updated and amended from time to time by the Licensee).	This document is consistent with the other plans.
		The license must, at all times, maintain the Works in accordance with the approved OMP (as updated and amended from time to time by the Licensee).	This document is consistent with the other plans.
		Any updates or amendments made to the VMP, OMP, NSP, CaP, TTP, and LMP by the Licensee, must be submitted, in writing, by the Licensee to the Licensing Authority for their written approval.	Section 3
	3.2.4.9	The Licensee must, within 3 months of the Completion of the Works, provide an updated OMP, in writing, to the Licensing Authority for their written approval. Notification must be provided at least 3 months in advance of any subsequent maintenance works where any additional deposits are required. In the event that these works are not assessed in the Application and are considered by the Licensing Authority as being material they will require further marine licences.	This document sets out the OMP for approval by the Scottish Ministers
OSP Marine Licence	3.1.1	The Licensee must at all times construct and operate the Works in accordance with this Licence, the Application, the supporting documents received (the Offshore Substation Platforms Marine Licence, Statement regarding Implications for the Environmental Statement ("ES") and Habitats Regulation	This document is consistent with the terms of the License, the Application and

¹ Although the Joint Nature Conservation Council (JNCC) are named as consultee within the relevant OMP conditions, Moray East has been advised that the Offshore Renewable Energy Casework responsibility has been delegated from JNCC to SNH from 1st April 2017.

² Scottish Natural Heritage (SNH) is now operating under the name NatureScot.

Consent Document	Condition Reference	Condition Text	Reference to relevant Section of the OMP
		Appraisal ("HRA"), and Method Statement), the Section 36 consent and the plans and programmes approved by the Licensing Authority .	related documents
		The Licensee must, at all times, maintain the Works in accordance with the approved Operation and Maintenance Plan ("OMP").	Section 3 and Section 8
	3.2.3.1	The Licensee must, no later than 3 months prior to the commissioning of the first OSP, submit an OMP, in writing, to the Licensing Authority for their written approval.	This document sets out the OMP for approval by the Scottish Ministers
		Such approval may only be granted following consultation by the Licensing Authority with SNH ² , SEPA, MCA, NLB, Aberdeenshire Council and any such other advisors or organisations as may be required at the discretion of the Licensing Authority.	Consultation to be undertaken by the Scottish Ministers
		The OMP must set out the procedures and good working practices for the operations and maintenance of the OSPs, substructures, and cable network of the Works.	Section 5 and Section 7
		Environmental sensitivities which may affect the timing of the operation and maintenance activities must be considered in the OMP.	Section 6
		The OMP must, so far as is reasonably practicable, be consistent with the EMP, the PEMP, the VMP, the NSP, the CaP and the LMP.	This document is consistent with the other plans.
	3.2.4.8	The Licensee must operate and maintain the Works in accordance with the approved OMP.	Section 3 and Section 8
		The Licensing Authority must be notified at least 3 calendar months in advance of any maintenance of the Works. In the event that these works are not covered by the licence and are considered by the Licencing Authority as being material and being licensable marine activities then the works will require a new Marine Licence.	Section 3 and Section 8

1.3 Scope of the OMP

The OfTI OMP provides an overview of the intended programme and timing of O&M activities undertaken on the Moray East OfTI assets. The assets comprise of three OSPs, excluding the 66 kV switchgear and the OSP interconnectors, and three OECs.

1.4 Guidance and Methodology

The following key RenewableUK guidance documents have been considered in completing this OMP:

- UK Wind Turbine Safety Rules, Version 3 (published 2015);
- Offshore Wind and Marine Energy H&S Guidelines (published March 2014);

- Integrated Offshore Emergency Response – Renewables (published 2016)
- Safety Circular: Notices to Mariners. Guidance for Offshore Wind & Marine Projects (Published 2013);
- FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Liaison (published January 2014);
- Guidelines for Selection and Operation of Jack-ups in Marine Renewable Energy Industry (published November 2013);
- First Aid Needs Assessment: Guidelines for Renewable Energy Projects (published December 2013); and
- Vessel Safety Guide: Guidance for Offshore Renewable Energy Developers (published April 2012).

1.5 Links with Other Consent Plans

This OfTI OMP forms part of a suite of approved documents (the Consent Plans) that will provide the framework to control and mitigate the effects of the operations of the Development, namely the other consent plans required under the Section 36 Consents and OfTI Marine Licences.

The OfTI OMP, in line with Condition 3.2.3.2 and Condition 3.2.4.4 of the OfTI Marine Licence, and Condition 3.2.3.1 of the OSP Marine Licence, and in so far as is reasonably practicable, will be consistent with the EMP (Environmental Management Plan), the PEMP (Project Environmental Monitoring Plan), the VMP (Vessel Management Plan), the NSP (Navigation Safety Plan), the OfTI CaP (Cable Plan) and the LMP (Lighting and Marking Plan) offshore consent plans, which are detailed in Table 1-2.

Table 1-2: Consent conditions to be discharged and reference sections

Condition	Consent Plan	Consistency with and linkage to OMP
OfTI Licences: Condition 3.2.1.1	PEMP	The PEMP provides an overview environmental monitoring for the project including bird monitoring, seabed scour and local sediment deposition monitoring. The OfTI OMP will as far as reasonably practicable be consistent with the PEMP.
OfTI Licences: Condition 3.2.2.4	OfTI CaP	The OfTI CaP provides detailed specifications of the cables, their installation, burial and/or protection, their interactions with the environment and safety considerations, adding to the information contained in this OMP.
OfTI Licences: Condition 3.2.1.2	EMP	The EMP sets out the environmental management framework for the construction and operation of the Wind Farm and OfTI. This OMP must be consistent with the EMP as is reasonable practicable.
OfTI Marine Licence Condition: 3.2.2.8; OSP Marine Licence: Condition 3.2.2.9	VMP	The VMP considers the management and coordination of vessels. The OfTI OMP must be consistent with the VMP.
OfTI Marine Licence: Condition 3.2.2.9; OSP Marine Licence: Condition 3.2.2.10	NSP	The NSP sets out the navigational safety measures to be applied for the Development. As far as is reasonably practicable, the OfTI OMP will must be consistent with this NSP.

Condition	Consent Plan	Consistency with and linkage to OMP
OfTI Marine Licence: Condition 3.2.2.9; OSP Marine Licence: Condition 3.2.2.10	LMP	The LMP provides details of lighting and marking of the OfTI structures (where applicable) during construction and operation of the Development. The Wind Farm OMP will as far as reasonably practicable be consistent with the LMP.
OfTI Marine Licence : Condition 3.2.1.4 ; OSP Marine Licence: Condition 3.2.1.4	Commercial Fisheries Mitigation Strategy (CFMS)	The CFMS sets out the Company mitigation strategy for commercial fisheries that may be adversely affected by the Development.
OfTI Marine Licence : Condition 3.1.12; OSP Marine Licence Condition : 3.2.1.8	Marine Pollution Contingency Plan (MPCP)	The MPCP provides the overarching framework for pollution prevention measures and contingency plans during the construction and operation of the Development.

Review of the Consent Plans will take place after any significant changes in the Development details to ensure consistency. Any updates to these documents, or the OfTI OMP, will be reflected where required in the associated documents in accordance with the procedure set out in Section 3 below.

Figure 1-1 provides an overview of the Moray East Consent Plans and indicates which plans are active during the respective phases of the Development. It should be noted that upon Commissioning of the first WTG, the Development will enter the interim operational phase, during which both construction and O&M activities will take place simultaneously. This phase will remain active until the Construction is completed and the Development is fully commissioned. In line with Condition 16 of the Section 36 Consents, the Moray East Wind Farm OMP will be in force from the moment the first WTG is commissioned. In line with Condition 3.2.3.2 and Condition 3.2.3.1 of the OfTI and OSP Marine Licences respectively, this OfTI OMP will be in force upon commissioning of the first OSP which will take place after the commissioning of the first WTG.

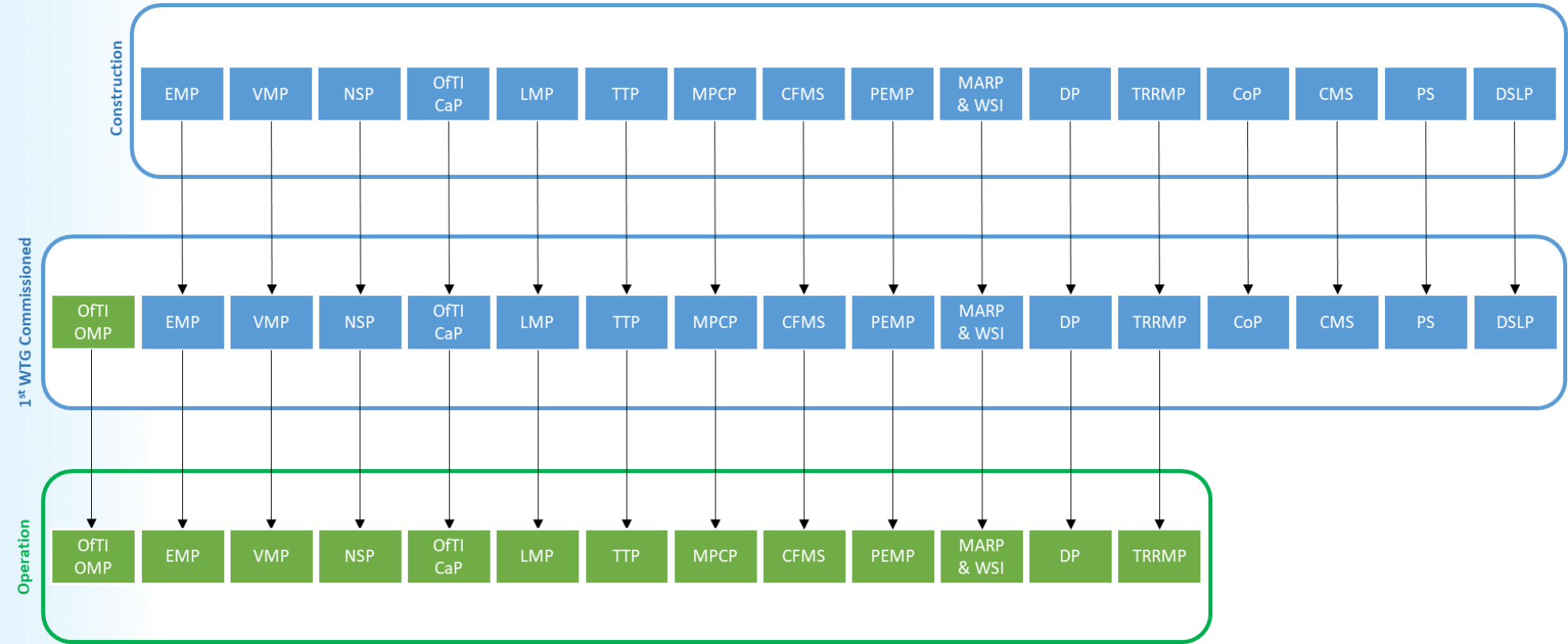


Figure 1-1 Active Consent Plans throughout the construction and operational phases (plan abbreviations are included in Abbreviations section upfront)³

³ Please note the VMP and NSP and similarly the CoP and CMS have been produced as single documents.

1.6 OMP Document Structure

In response to the specific requirements of the OfTi Marine Licences conditions, this OfTi OMP has been structured so as to be clear that each part of the specific requirements have been satisfied and that the relevant information to enable the Scottish Ministers to approve the OfTi OMP has been provided. The document structure is set out below as follows:

Table 1-3: Document Structure

Section	Title	Overview
1	Introduction	Background to consent requirements and overview of the OMP scope, methodology, links to other consent plans and structure.
2	Moray East Statement of Compliance	Sets out the Moray East statements of compliance in relation to the OMP consent conditions and O&M activities.
3	Updates and Amendments to this OMP	Sets out the procedures for any required updating to or amending of the approved OMP and subsequent further approval by the Scottish Ministers.
4	Development Overview	Provides an overview of the Development and a description of the subdivision of its assets (i.e. wind farm and OfTI).
5	Approach to Health, Safety and the Environment (HSE)	Sets out approach to the HSE aspects of the Project. Sets out the procedure and good working practices for the operation and maintenance of the OfTI.
6	Environmental Sensitivities and Good Working Practices	Provides an overview of the environmental sensitivities which may affect the O&M activities of the OfTI.
7	Communications and Reporting	Provides an overview of the procedures and practices for internal communications and reporting and sets out the procedures and practices for liaising with relevant authorities on Moray East HSE matters.
8	OfTI Operation and Maintenance Activities	Sets out the programme for O&M activities of the OfTI assets providing an overview of indicative timings.
9	Compliance with the Application and ES	A statement of any commitments from the Application and ES related to this OMP.

2 Moray East Statement of Compliance

2.1 Introduction

The following section re-affirms the Moray East commitment to ensuring that the OfTI assets are operated in such a manner as to meet the relevant requirements set by the OfTI Marine Licences and other legislative requirements.

2.2 Statement of Compliance

Moray East will, in undertaking the operation and maintenance of the OfTI assets, require compliance with this OMP as approved by the Scottish Ministers (and as updated or amended from time to time following the procedure set out in Section 3 of this OMP).

Where significant updates or amendments are required to this OMP, Moray East will require that the Scottish Ministers are informed of the potential need for an update to the OMP as soon as reasonably practicable and, where necessary, the OMP will be updated or amended (see Section 3).

Moray East will, in undertaking the operation and maintenance of the OfTI assets, require compliance with other relevant Consent Plans as approved by the Scottish Ministers including the documents set out in Section 1.5.

Moray East in undertaking the operation and maintenance of the OfTI assets will ensure compliance with the limits defined by the original application, the project description defined in the Moray East ES (Moray East, 2012), Moray East Modified TI ES (Moray East, 2014), OSP Marine Licence Application Documents 2017 and the Offshore Consents Variation Application Report 2017 referred to in Annex 1 of the Section 36 Consents (as varied in March 2018) in so far as they apply to works or activities covered by this OMP (unless otherwise approved in advance by the Scottish Ministers).

Moray East will, in undertaking the operation and maintenance of the OfTI assets, require compliance with the approved OMP (and all other relevant, approved Consent Plans as detailed in Section 1.5) by the Key Contractors through condition of contract and by an appropriate auditing process.

Moray East, in undertaking the operation and maintenance of the OfTI assets up to the point of transfer of the assets to an Offshore Transmission Operator (OfTO), will ensure compliance with Moray East HSE systems and standards, the relevant Health and Safety Executive legislation and such other relevant legislation and guidance so as to protect the safety of the OfTI O&M personnel and other third parties, as described in Section 0.

2.3 Legislative Requirements

Moray East will, in undertaking the operation and maintenance of the OfTI assets, require compliance with legislation relevant to this OMP and that all necessary licences and permissions are obtained by the Key Contractors and Subcontractors, through conditions of contract and by an appropriate auditing process.

Moray East will comply with, and oblige Moray East contractors to comply with through conditions of contract, the requirements of relevant environmental legislation as standard up to the point of transfer of the OfTI assets to an OfTO.

2.4 Key Roles and Responsibilities under the Plan

Table 2-1 Key Roles and Responsibilities under the Plan

Role	Responsibility under the plan
Moray East	Moray East has overall responsibility for the OfTI OMP and compliance.
Head of Operations & Maintenance	<ul style="list-style-type: none"> Overall responsibility for the ongoing safe operation of the Moray east Offshore Wind Farm; Supervision of the drafting and final approval of the OfTI OMP; Responsible for ensuring that sufficient resources and processes are in place to deliver / comply with the OfTI OMP; and Responsible for ensuring the OfTI OMP is kept updated and is relevant to the project activities
Operations and Maintenance Manager	<ul style="list-style-type: none"> Ensuring all requirements of OfTI OMP are adhered too and actioned; Ensuring all Moray East staff and Contractors are correctly inducted, managed and set to work in a safe and efficient manner; Addressing Moray East and Contractor non-compliance if they arise and ensuring corrective actions are implemented; and Ensuring all activities are planned, carried out correctly, in accordance with this OfTI OMP and in a safe and QHSE compliant manner.
Moray East QHSE Manager	<ul style="list-style-type: none"> Coordinating, monitoring and implementing compliance through the HSE management plans which will be complementary to the OfTI OMP; Focal point in providing support advice and guidance on QHSE matters to the project team and contractors; Actively participate in safety walkdowns and task toolbox talks; and Carry out routine audits and investigations.
Marine Coordinator	<ul style="list-style-type: none"> Day to day management of movement of vessels; Point of contact for all marine operations, communications and safety at sea; Focal point for emergency response and drill activities; and Issuing of work permits and monitoring of weather conditions
Operations and Maintenance Environmental Advisor	<ul style="list-style-type: none"> Nominated in writing by the Head of Operations & Maintenance ad responsible for advising the Operations and Maintenance team on compliance with consent conditions; Manages post-construction monitoring and liaison with the Moray Firth Regional Advisory Group; and Maintains the ES Commitments Registers
Fisheries Liaison Officer (FLO)	<ul style="list-style-type: none"> To act as an effective communication point between Moray East's contractors and the fishing industry on site during offshore construction works; Maintain a lookout for fishing vessels or fishing gear and advise, through effective communication, the minimum distance required between Moray East contracted vessels and external fishing vessels or fishing gear; To be the first point of contact for fishermen at sea whilst construction activities are taking place; and To maintain communication with Moray East and the Company FLO regarding O&M, in order to communicate with the local fishing industry O&M activities and their respective safety zones where applicable.

3 Updates and Amendments to this OMP

Condition 3.2.4.4 of the OfTI Marine Licence recognises that updates or amendments to this OfTI OMP may be required, stating that:

“The license must, at all times, maintain the Works in accordance with the approved OMP (as updated and amended from time to time by the Licensee). Any updates or amendments made to the VMP, OMP, NSP, CaP, TTP, and LMP by the Licensee, must be submitted, in writing, by the Licensee to the Licensing Authority for their written approval.”

Where it is necessary to update this OMP in light of any significant new information related to the O&M activities, Moray East propose to use the change management process set out in **Error! Reference source not found.** in identifying such information, communicating such proposed change to the Scottish Ministers, re-drafting the OMP, seeking further approval for the necessary amendments or updates and disseminating the approved changes / amendments to responsible parties. Until transfer of the OfTI to the OfTO Moray East will be responsible for updating the OfTI OMP, upon transfer of ownership the OfTO will be responsible for updating the OMP as required.

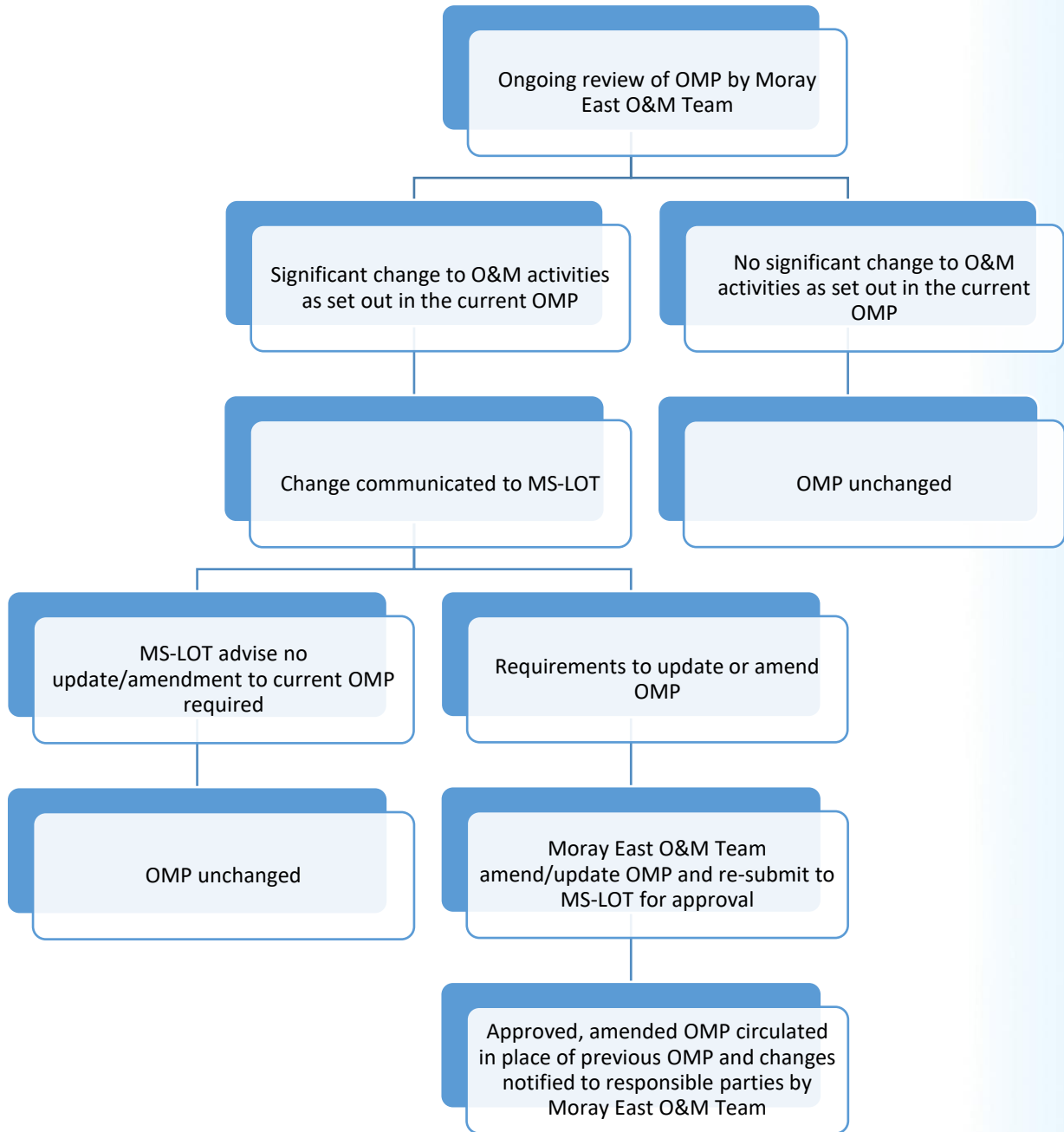


Figure 3-1 Change Management Procedure

4 Development Overview

This section provides a brief overview of the Development. The main components which constitute the Development are subdivided in two main categories, namely the Wind Farm and the OfTI assets. It should be noted that this OMP deals with the OfTI assets, as defined in Section 1.

The Development will consist of the following main components:

- Wind Farm assets:
 - A total generating capacity of approximately 950 MW, however the total generation capacity will be constrained by the Development's grid connection Transmission Entry Capacity (TEC) of 900 MW (further details provided within the Design Specification and Layout Plan (DSLPL) (Moray East, 2020) 100 MHI Vestas 164 9.5 MW WTGs (further details provided in the DSLPL);
 - WTG Jacket substructures, each installed on three pin pile foundations driven into the seabed;
 - A network of buried or (if burying is not possible) mechanically protected subsea inter array cables, to connect strings of turbines together and to connect the turbines to the OSPs;
 - The 66 kV switchgear on each of the three OSPs; and
 - Minor ancillary works such as met buoys and permanent navigational marks.
- OfTI assets:
 - Three AC OSPs to collect the generated electricity and transform the electricity from 66 kV to 220 kV for transmission to shore, excluding the 66kV switchgear;
 - Two buried or, if burying is not possible, mechanically protected subsea OSP interconnector cable circuit that link the OSPs to one another (as defined in the OfTI CaP);
 - Three buried or, if burying is not possible, mechanically protected, subsea export cables, each of approximately 60-65 km in length, to transmit the electricity from the three OSPs to the landfall at Inverboyndie and connecting to the buried onshore export cables for transmission to the onshore substation and connection to the national electricity transmission system.

The Moray East site is located approximately 22 km offshore from its nearest point to the east Caithness coastline in the Moray Firth as shown on Figure 4-1 below.

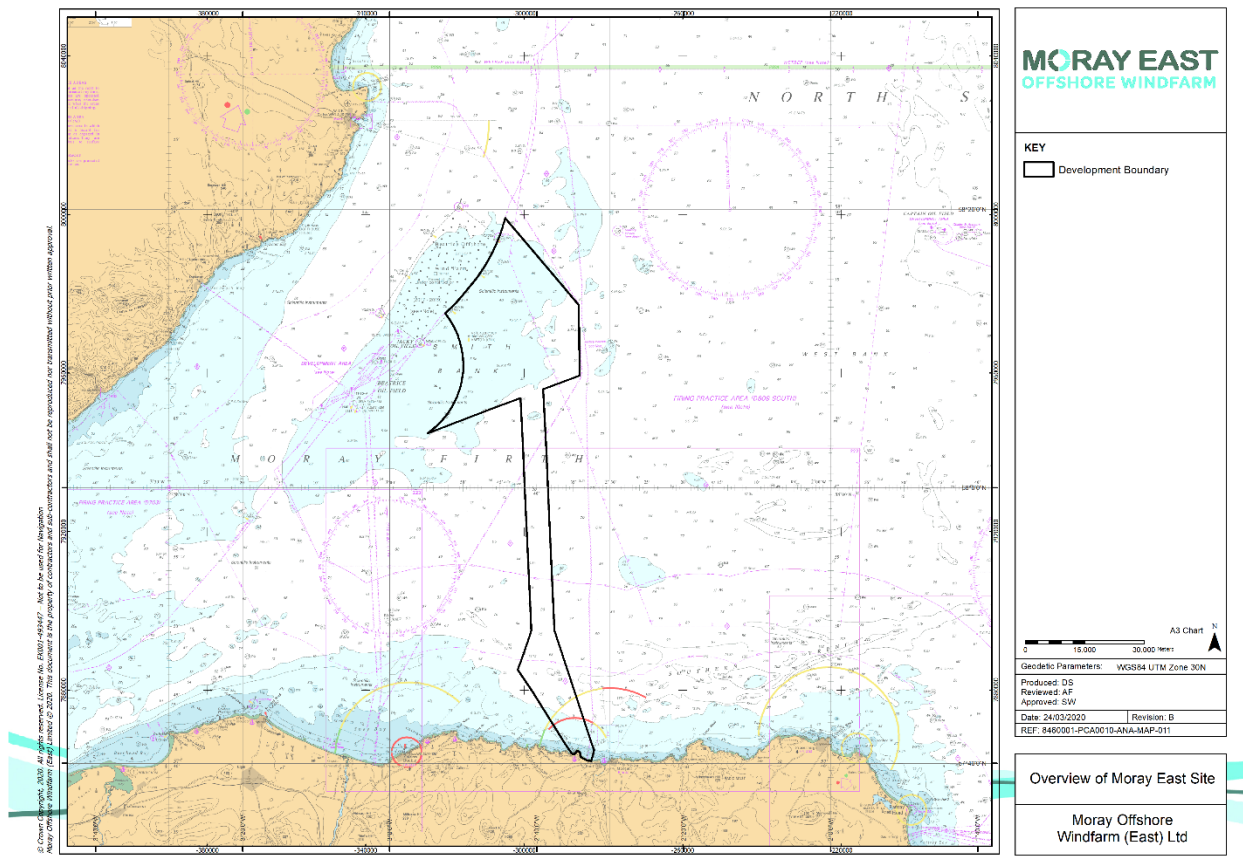


Figure 4-1: Moray East Offshore Wind Farm and OfTI (the Development) Location

4.1 OfTI Assets

The OfTI assets shall be managed out of the O&M base in Fraserburgh. The base itself houses technicians and management personnel whilst Fraserburgh Harbour provides dedicated quay side facilities for loading and unloading of crew transfer vessels (CTVs) and waste handling. The O&M base includes office and welfare facilities, spare part storage space, and also houses the Moray Offshore Windfarm (East) Limited (Moray East) control room and Marine Coordination Centre (MCC).

The Moray East control room and MCC shall provide the following key services:

- work permit activation/deactivation;
- marine surveillance - vessel and personnel tracking;
- emergency response coordination; and
- monitoring of the Supervisory Control and Data Acquisition (SCADA) system and HV switching (including alarm handling).

The OfTI assets mainly comprise of three OSPs and interconnectors, and three OEC infrastructure. Mechanically protected subsea export cable circuits are to transmit the electricity from the OSPs to the landfall at Inverboyndie Bay. A total of three export cables have been installed, one to each of the OSP. The cables are nominated from West to East as ME-OEC1 (56.3 km), ME-OEC2 (63.4 km) and ME-OEC3 (57.1 km). At the OSPs, each OEC accompanied with a Cable Protection System (CPS) has been pulled into an through a steel J-tube with a bellmouth approximately 2-3 m above seabed at the OSP, with sufficient

Moray Offshore Windfarm (East) Limited Operation and Maintenance Programme

cable being pulled up into the OSP to allow for it to be connected to the termination point on the topside unit of the OSP.

The OSP locations and the arrangement of the OECs connections to the OSPs are shown in Figure 4-2 and Figure 4-3.

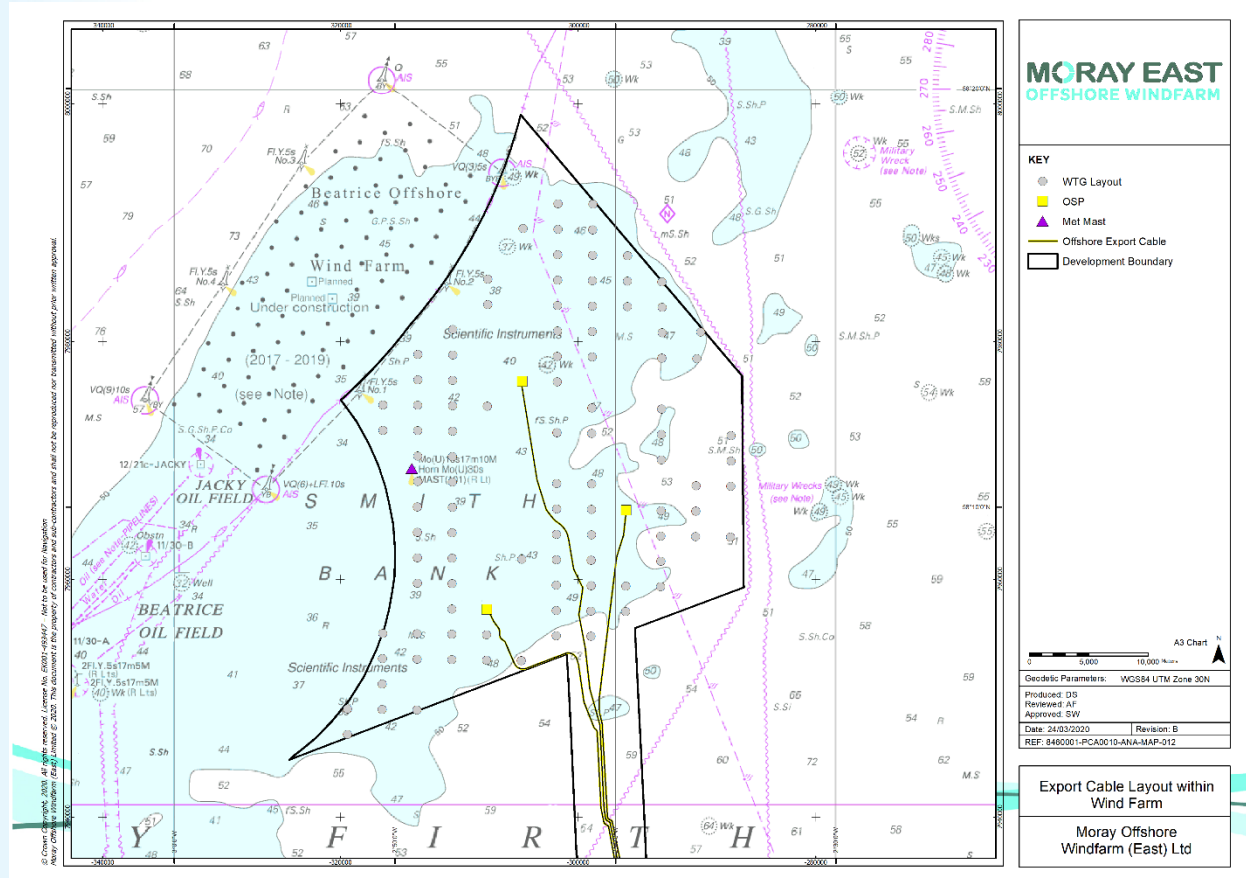


Figure 4-2 Offshore Substation Platforms (OSPs) and Offshore Export Cables (OECs) Layout within the Wind Farm

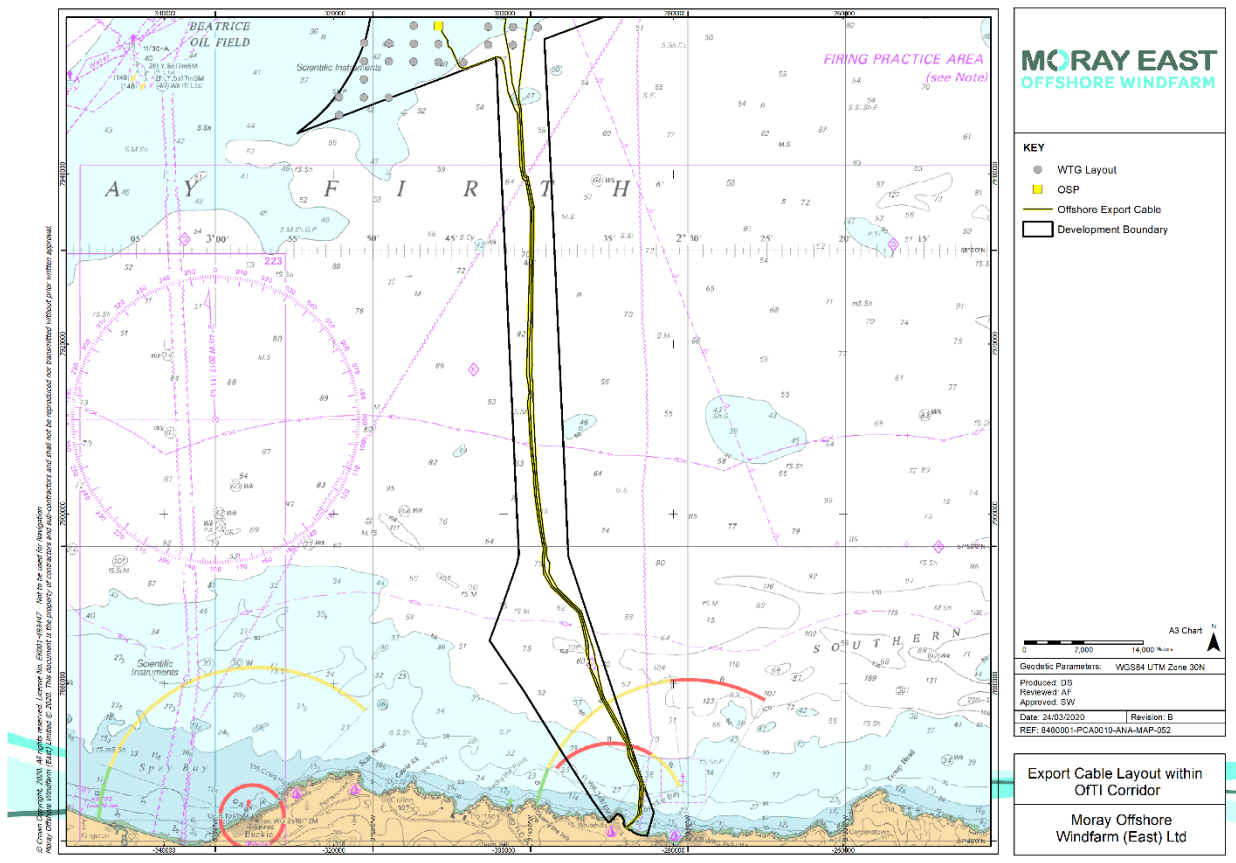


Figure 4-3 Export Cable Layout within the OfTI Corridor

4.2 Supervisory Control and Data Acquisition System

The Supervisory Control and Data Acquisition (SCADA) system has been implemented to provide an operator interface with the Wind Farm Assets. The SCADA system provides an interface to the WTG controllers, and provides high-level performance and system information. The SCADA systems will allow authorised operatives to override automatic operation, take remote control, adjust control parameters, and provide operational and performance data in a searchable and comparable form.

The SCADA system will also provide remote monitoring and control of the Medium and High Voltage electricity networks giving the ability to either isolate or re-energise part of or whole networks remotely.

The control room will continuously monitor the SCADA system and react to any alarms and events that occur. The control room operative will have the necessary authorisation to shut down individual or multiple WTG's as deemed necessary and will escalate any issues to the O&M Manager. Remote access to this SCADA system is available through an internet connection if any issue arises.

The information above demonstrates how generation to the OfTI assets is controlled.

5 Approach to Health, Safety and the Environment and Good Practices

Moray East have an overarching Quality, Health, Safety and Environment (QHSE) policy stating their commitments to safety, health and environment. The key commitments from Moray East QHSE policy are outlined below.

Moray Offshore Windfarm (East) Limited is fully committed to meet shareholder requirements, and to engage with all stakeholder to meet the following expectations:

- Develop, continually improve and measure overall performance, by establishing attainable QHSE Key Performance Indicators (KPIs);
- Acknowledge and reward excellence; and
- Promote corporate responsibility.

More specifically Moray East will:

- Maintain a commitment to prevention of ill health and injuries to all employees, contractors, visitors and members of the public, and prevention of pollution on undertakings under our control.
- Provide a safe working environment to all employees, contractors, visitors and members of the public, on undertakings under Moray East's control, by providing and maintaining safe plant, equipment, facilities and working practices.
- Ensure all undertakings are adequately planned, with sufficient resource, and carried out by trained and competent personnel.
- Identify all hazards/aspects and mitigate risks/impacts associated with Moray East's undertakings, in compliance with statutory obligations and Moray Offshore Windfarm (East) Limited and shareholders imposed requirements.
- Commit to continuous improvement throughout our business activities, by establishing and monitoring defined measurable objectives that are applicable to all employees.
- Consult with employees on all matters which may affect their health and safety.
- Engage with employees, suppliers and contractors to promote safety first, Zero Harm, and corporate responsibility aspirations.
- Ensure employees receive adequate training, information, instruction and supervision to enable them to undertake and complete their duties competently.
- All employees will be encouraged to report near misses and safety/environmental concerns , to create a "no-blame" culture of safety, responsibility and ownership.
- Reduce carbon footprint by conserving natural resources and reducing energy use and waste generated by operations and contractors.
- Support and maintain our commitment to the protection of the environment, including prevention of pollution.
- Ensure the implementation and maintenance of the management systems, enabling continuous improvement through regular monitoring, audit and review.

The Policy Statement is supported by the Moray Offshore Windfarm (East) Limited Integrated Management System and is endorsed by Senior Management.

5.1 Asset Management System

Moray East have implemented an all encompassing Computerised Maintenance Management System (CMMS).

This system will track and manage all components and assets of the Wind Farm and O&M shore base and provide the below:

- Incorporate all inspection, maintenance and replacement requirements and dates;
- Track key warranty dates and any attached conditions;
- Include all O&M manuals, supporting documents, safety documentation and work instructions; and
- Include all activity dates and ensure compliance with all project conditions and consents.

Moray East currently has the Construction, Design and Management (CDM) Plan in place and this covers, but is not limited to, the management of health and safety, management roles and responsibilities and communications. It also covers emergency responses and reporting and investigation of accidents and incidents including near misses. In the event of a serious incident Moray East will report this to the Health Safety Executive as well as Marine Scotland.

Further details on the emergency response during operations will be given in a separate Emergency Response and Cooperation Plan (ERCoP) which will be developed in consultation with the Maritime Coastguard Agency (MCA) and, therefore, does not form part of this OfTI OMP.

5.2 Environmental Management

Information concerning environmental management is set out in the Moray East EMP (Moray East, 2018) and the OfTI O&M interim activities described in this OfTI OMP will be undertaken in line with the procedures and practices set out in the EMP.

In order to manage the environmental risks arising from the O&M of the OfTI Assets, an Environmental Management System (EMS) shall be implemented.

The EMS includes processes designed to manage environmental impacts and secure environmental compliance and long-term sustainability. The EMS shall align with both the company Environmental Policy and the overarching Asset Management System (AMS) but shall also reflect the specific requirements of the consent conditions, environmental constraints, risks and opportunities specific to the OfTI Assets.

This OfTI OMP will form part of a suite of EMS management plans which will include other active consent plans as illustrated in Figure 1-1.

6 Environmental Sensitivities and Good Working Practices

6.1 Waste Management

A Waste Management Plan (WMP) has been prepared by Moray East to outline waste management measures for the operational phases of the Development.

Moray East is committed to reducing and re-using the resources it uses through all stages of development, including construction, operation and decommissioning. The WMP is the key tool which will be used to plan, implement, monitor and review waste minimisation and management during the construction and interim operation of the Development in accordance with Moray East's commitments.

The WMP sets out measures to minimise, recycle, reuse and dispose of waste streams during the operation phase of the Development, in compliance with relevant waste legislation. It sets out the general principles for waste management that all Moray East personnel and Contractors shall comply with.

6.2 Environmental Sensitivities

As part of the consideration of the application and the Environmental Statement (ES), Marine Scotland consulted with advisory and regulatory bodies for comment on the validity of the ES document and the conclusions of environmental impacts. The potential impacts from routine O&M activities are mainly associated with vessel movements and the presence of vessels within the Moray East area.

Service and inspection works will take place predominately on WTG structures and will have limited impact on marine species and habitats. No periods of increased sensitivity were identified in the ES relevant to O&M activities; therefore, no significant impacts were predicted.

During the O&M phase, it will be necessary to monitor the growth of biofoul on the WTG jacket substructures. The monitoring campaign will be used to inform the biofoul removal strategy, dependent on the rate and nature of growth, and to identify potential impacts arising from the removal. This strategy will be developed for the O&M phase and will be based on best practice and developed in consultation with MS-LOT and other relevant stakeholders.

Environmental sensitivities for Moray East were identified during baseline surveys and desk based reviews, supporting the ES impacts identified and discussed included:

- Birds
- Marine mammals
- Fish and shellfish
- Benthic and intertidal ecology / seabed habitats

Environmental considerations associated with the O&M activities are outlined in Table 6-1 below.

Table 6-1: Environmental sensitivities associated with O&M activities as assessed within the ES

Receptors	Environmental Sensitivities
Birds	<p>Likely effects from O&M activities assessed were predicted to be limited to the following:</p> <ul style="list-style-type: none">• disturbance caused by maintenance vessels. <p>The assessment concluded no significant effect on birds and any protected sites designated for birds.</p>

Receptors	Environmental Sensitivities
Marine mammals	<p>Likely effects from O&M activities assessed were predicted to be limited to the following:</p> <ul style="list-style-type: none"> • direct impacts (collision) and disturbance from an increase in vessel movements; and • toxic contamination from leaching of compounds on OSPs and maintenance vessels. <p>The assessment concluded no significant effect on marine mammals and any protected sites designated for marine mammals during the operation of the OfTI.</p>
Fish	<p>Likely effects from O&M activities assessed were predicted to be limited to the following:</p> <ul style="list-style-type: none"> • changes to fish populations due to changes in fishing activity from the presence of maintenance vessels. <p>The assessment concluded no significant effect on fish and shellfish during the operation of the OfTI.</p>
Benthic and intertidal ecology / seabed habitats	<p>Likely effects from O&M activities assessed were predicted to be limited to the following:</p> <ul style="list-style-type: none"> • introduction of marine non-native species (MINNS) from an increase in vessel use; <p>The assessment concluded no significant effect on benthic and intertidal ecology / seabed habitat during the operation of the OfTI.</p>

7 Communications and Reporting

7.1 Communications

Moray East will hold daily and weekly operations meetings involving the QHSE and O&M Management team and also any contractors carrying out works. Regular QHSE reports will be provided detailing (but not limited to) the work scope, progression to date, environmental management, and any incidents, environmental or otherwise. All Contractors and their Subcontractors will be made aware of and provided with copies of the relevant consents and licences and made aware of the consent obligations associated with the particular works they are involved in.

In addition, regular environmental and consents meetings will take place involving the QHSE and O&M Management team to plan emerging works happening in the near and distant future .

Moray East will ensure that it communicates with Marine Scotland on all relevant consent conditions and compliance matters.

All required returns or reports during the operations phase will be provide to Marine Scotland by the O&M management team.

7.2 Incident Response and Reporting

In the event that an environmental or pollution incident occurs and following any required statutory notifications, the responsible personnel or contractor will notify Moray East as soon as possible. Where an incident involves a Contractor (and/or their subcontractors), the contracting entity will have the prime responsibility for responding to any incident.

An incident response shall be executed in accordance with the procedures detailed in the MPCP and EMP where it relates to Moray East personnel or activities. Where the incident is a result of activities within a Contractor's (and/or their subcontractors) scope of works the incident response will be executed in accordance with their own response procedures compliant with the relevant Consent Plans.

7.3 Other Reporting and Notification Requirements

Table 7-1 Other reporting and notification requirements

Topic	Condition Reference	Condition Text	Frequency
Vessels, vehicles, agents, contractors and sub-contractors	OfTI Marine Licence, Condition 3.1.2; OSP Marine Licence, Condition 3.1.3	The Licensee must ensure that prior to their engagement in the Licensable Marine Activity authorised under this licence, the name and function of any vessel, vehicle, agent, contractor or sub-contractor appointed to engage in the Works and, where applicable, the master's name, vessel type, vessel IMO number and vessel owner or operating company, are fully detailed in the Vessel Report and the Persons Acting on Behalf of the Licensee Reports available on the Moray East Offshore Wind Farm, Keeping Mariners Informed webpage, which can be found at: http://www.morayoffshore.com/moray-east/the-project/notices-to-mariners/ . Any changes to the supplied details must be uploaded to the Vessel Report and the Persons Acting on Behalf of the Licensee Report and the Licensing Authority must be notified, in writing, prior to any vessel, agent, contractor or sub-	As required

Topic	Condition Reference	Condition Text	Frequency
		contractor which has not yet been notified to the Licensing Authority engaging in the Licensable Marine Activity. Only those vessels, agents, contractors or sub-contractors detailed in the Vessel Report and the Persons Acting on Behalf of the Licensee Report are permitted to carry out any part of the Works.	
Force majeure	OfTI Marine Licence, Condition 3.1.3; OSP Marine Licence, Condition 3.1.4	Should the Licensee or any of their agents, contractors or Subcontractors, by any reason of force majeure deposit anywhere in the marine environment any substance or object, then the Licensee must notify the Licensing Authority of the full details of the circumstances of the deposit within 48 hours of the incident occurring (failing which as soon as reasonably practicable after that period of 48 hours has elapsed). Force majeure may be deemed to apply when, due to stress of weather or any other cause, the master of a vessel or vehicle operator determines that it is necessary to deposit the substance or object other than at the Site because the safety of human life or, as the case may be, the vessel, vehicle or marine structure is threatened. Under Annex II, Article 7 of the Convention for the Protection of the Marine Environment of the North-east Atlantic, the Licensing Authority is obliged to immediately report force majeure incidents to the Convention Commission.	As required – within 48 hours of occurrence
Material alterations of the Licence applications	OfTI Marine Licence, Condition 3.1.4 OSP Marine Licence, Condition 3.1.5	The Licensee must, where any information upon which the granting of this licence was based has after the granting of the licence altered in any material respect, notify the Licensing Authority of this fact, in writing, as soon as is practicable.	As required
Submission of plans and specification of studies and surveys to the Licensing Authority	OfTI Marine Licence, Condition 3.1.5 OSP Marine Licence, Condition 3.1.6	The Licensee must submit plans and the details and specifications of all studies and surveys that are required to be undertaken under this licence in relation to the Works, in writing, to the Licensing Authority for their written approval. Commencement of the studies or surveys and implementation of plans must not occur until the Licensing Authority has given its written approval to the Licensee. Plans or the specification of studies and surveys prepared pursuant to another consent or licence relating to the Works by the Licensee or by a third party may also be used to satisfy the requirements of this licence.	As required
Submission of reports and notifications to the Licensing Authority	OfTI Marine Licence, Condition 3.1.6 OSP Marine Licence, Condition 3.1.7	The Licensee must submit all reports and notifications to the Licensing Authority, in writing, as are required under this licence within the time periods specified in this licence. Where it would appear to the Licensee that there may be a delay in the submission of the reports to the Licensing Authority, then the Licensee must advise the Licensing Authority of this fact as soon as is practicable and no later than the time by which those reports or notifications ought	As required

Topic	Condition Reference	Condition Text	Frequency
		<p>to have been submitted to the Licensing Authority under the terms of this licence.</p> <p>The reports must include executive summaries, assessments and conclusions and any data will, subject to any rules permitting non-disclosure, be made publically available by the Licensing Authority or by any such party appointed at their discretion.</p> <p>Reports prepared pursuant to another consent or licence relating to the Works by the Licensee or by a third party may also be used to satisfy the requirements of this licence.</p> <p>Such reports will include, but not be limited to, Transportation Audit Reports.</p>	
Chemical usage	OfTI Marine Licence, Condition 3.1.7	The Licensee must ensure that all chemicals which are to be utilised in the Works have been approved in writing by the Licensing Authority prior to use. All chemicals utilised in the Works must be selected from the List of Notified Chemicals assessed for use by the offshore oil and gas industry under the Offshore Chemicals Regulations 2002, unless approved in writing by the Licensing Authority.	Prior to chemical use
	OSP Marine Licence, Condition 3.1.8	The Licensee must ensure that all chemicals which are to be utilised in the Works have been approved prior to use. All chemicals which are to be utilised in the Works must be selected from the List of Notified Chemicals assessed for use by the offshore oil and gas industry under the Offshore Chemicals Regulations 2002 (as amended) or as exempted for sealed units. The Licensee must submit a report of all chemicals and quantities to be used (e.g. oils and fluorinated gases) during the construction, and operation of the works to the Licensing Authority no later than one calendar month prior to the Commencement of the Works. Any changes to the types of chemicals which are proposed to be utilised must be consulted on with the Licensing Authority prior to the Commencement of the Works or, as the case may be, after the Commencement of the Works but prior to their utilisation.	
Emergencies	OfTI Marine Licence, Condition 3.1.11	<p>If the assistance of a Government Department (to include departments of Devolved Administrations) is required to deal with any emergency arising from:</p> <p>a) the failure to mark and light the Works as required by this licence;</p> <p>b) the maintenance of the Works; or</p> <p>c) the drifting or wreck of the Works,</p> <p>to include the broadcast of navigational warnings, then the Licensee is liable for any expenses incurred in securing such assistance.</p>	In the event of an emergency.
Health and safety incident	OfTi Marine Licence, Condition 3.2.1.5	If any serious health and safety incident occurs on the Site requiring the Licensee to report it to the Health and Safety Executive, then the Licensee must also notify the Licencing Authority of the incident within 24 hours of the incident occurring.	In event of an incident

8 OfTI Operation and Maintenance Activities

Moray East will ensure that all OFTI assets are maintained and operated safely and in accordance with the O&M guidance and recommendations and also industry good practice. Scheduled works will be planned using a risk based inspection methodology approach, an indicative inspection frequency can be found in the table below there will also be unscheduled works needed from time to time to allow remedial works to be carried out to ensure the ongoing safe operation of all assets.

Moray East will notify MS-LOT at least three months in advance of commencement of any maintenance/repair works which require any additional deposits. Additional marine licences will be sought where remedial activities are not covered by the existing Marine Licences and following agreement with MS-LOT.

8.1 Maintenance Requirements

Table 8-1 Schedule of O&M activities

Component	Description of Works	Method of Access	Estimated Frequency of Works
Blind Flanges	Visual Inspection of integrity of flange and signs of corrosion	This work will be carried out internally from the base of the topside structure, access can be from either CTV or SOV	12 months
Bolted connections	Visual inspection of torqueing marks and percentage test	Access will be gained via the jacket landings by either CTV or SOV	12 months
Cable Hang-offs	Visually inspect for fatigue, damage or corrosion issues	This work will be carried out from the intermediate platform or if necessary Rope Access will be used, access can be from either CTV or SOV	12 months
Corrosion protection system: Coating	Visual Inspection of coatings, for signs of corrosion or degradation	Topside coatings will be accessed by walkways and landings, any out of reach areas will be by rope access, all works below the water line will be by hand launched mini ROV, the works can either be carried out from the CTV or SOV	12 months
Corrosion protection system: Anodes	Routine maintenance checks for security of fixings and integrity of the Anodes	Mini hand launched ROV will carry out inspection works on the Anodes, launched either from the CTV or SOV	12 months
Earthing Arrangements	Visually and Functionality tested	Access will be gained via the jacket landings by either CTV or SOV	12 months
Fall Arrest System (SRL)	Repair, inspect or replace SRL devices as necessary	All vessels will carry SRL spares and a trained and competent person, this will allow the unit to be repaired from either the CTV or SOV	12 months
Gates	Routine maintenance of landing gate structures and friction opening devices	Access to the Gates will be gained via the jacket landings by either CTV or SOV	12 months

Moray Offshore Windfarm (East) Limited
Operation and Maintenance Programme

Component	Description of Works	Method of Access	Estimated Frequency of Works
Grout Pipe Caps	Following the initial installation of the grout pipe caps, routine surveys will be carried out to monitor its integrity and ongoing effectiveness	Mini hand launched ROV will carry out survey work around the grout pipe caps, launched either from the CTV or SOV	12 months
GRP Gratings / Boat Landings / Railings / Ladders/ Steps / Staircases	Routine maintenance, torquing of fixings and replacing any damaged sections as necessary	Access will be gained via the jacket landings by either CTV or SOV	12 months
Lifting eyes/pad eyes/anchorage points	Routine maintenance, repair and Statutory examination	Access will be gained via the jacket landings by either CTV or SOV	12 months
Marine Growth / Guano Cleaning	All areas in the splash zone and access ladder sections will be cleaned using high pressure hose	Access to perform the cleaning activities will be gained by either CTV or SOV	Periodic (As necessary to enable a safe means of access)
Navigation aids	All aids to be maintained in accordance with the manufacturers recommendations, all repairs will be carried out by trained persons	Access to the Navigation aids will be gained via the jacket landings by either CTV or SOV	6 months
Railings, Ladders / steps / staircases	Routine maintenance, repair and examination	Access will be gained via the jacket landings by either CTV or SOV	12 months
Scour protection	Following the initial installation of the scour protection, routine surveys will be carried out to monitor its integrity and ongoing effectiveness	Mini hand launched ROV will carry out survey work around base of foundations, launched either from the CTV or SOV	12 months (for first 3 years, the results of these work will determine any future frequencies required)
Secondary Steel Jacket	Visual Inspection of all components and fixings	Access will be gained via the jacket landings by either CTV or SOV	12 months
Stainless steel items	Visual checks for integrity of items	Access will be gained via the jacket landings by either CTV or SOV	12 months
Signage, Marker Boards and Stickers	Visual checks that all signage, marker boards and stickers are in place and clearly visible	Access will be gained via the jacket landings by either CTV or SOV	12 months
Davit Crane Assembly	Routine maintenance, servicing and Statutory Examination	Access will be gained via the jacket landings by either CTV or SOV	12 months
Subsea / inter array cable Inspection, Free Spanning, Cable Routing, Rock Protection, General Coverage	Visual Sub Sea Inspection along route of main and inter array cabling	Mini hand launched ROV will carry out inspection works on the Anodes, launched either from the CTV or SOV	12 months

Component	Description of Works	Method of Access	Estimated Frequency of Works
Reburial of export cables	Should any inter-array or export cable become exposed rectification works will be required	Cable burial techniques / vessels will be similar in principle to those used in the construction phase, the area of exposure will be detected and a pre works survey carried out, burial activities will then be carried out then followed up by a post works survey	As per the 12 month survey findings
Export cable / joint repairs	Cable fault will be detected and repaired by specialist contractor	Access will be gained by a specialist cable repair vessel and ROV	As deemed necessary
OSP Transformer and Protection System	Visually and Functionality tested, oil sampling and Thermographic Surveying, repairs will be carried out by Siemens during the Warranty periods	Access will be gained via the jacket landings by either CTV or SOV	12 months

As required under Condition 3.2.4.9 of the OfTI Marine Licence and Condition 3.2.4.8 of the OSP Marine Licence, Moray East will notify the Licensing Authority of any maintenance works involving additional deposits, at least three-months in advance of the works.

Moray East acknowledge that in the event that maintenance works of this nature are required, Moray East will need to either: satisfy the Licensing Authority that these works were assessed as part of the marine licence application, or submit a further marine licence application for the works.

8.2 Maintenance Schedule for Routine Service Activities

All OfTI assets are handed over to O&M with routine service recommendations and information detailing the level of servicing required. This information is used to develop the annual service plan that forms the basis of routine O&M activities. OfTI assets requiring routine service activities can be broken down into three main categories as presented in the sub-sections below.

8.3 Unscheduled Activities

There will be occasions when the OfTI assets will require unscheduled inspections, maintenance and/or repairs. Generally, unscheduled activities take place at any time of the year subject following failure or signs of underperformance, works are executed during suitable weather windows that arise.

8.4 Major Component Repairs

Major component repairs are considered to be unforeseen faults that could trigger emergency repairs requiring large component replacements and extensive remedial works. Examples of Major OfTI Components are:-

- Main Transformer;
- Auxilliary Transformer;
- Gas Insulated Switch Gear; and
- Shunt Reactor.

9 Compliance with the Application and ES

ES Commitments Registers have been developed that identify the environmental management, mitigation (and also monitoring) measures set out in ES as developed by the requirements of the consent conditions, and any other commitments made by Moray East to environmental management and mitigation. The OfTI Commitments (Modified TI ES 2014) relevant to all phases of the project and to the operations can be found under Appendix VII of the Moray East EMP .

10 References

Moray East. (2012). Telford, Stevenson and Maccoll Wind farms and Associated Transmission Infrastructure Environmental Statement.

Moray East. (2014). Modified Transmission Infrastructure for Telford, Stevenson and MacColl Wind Farms Environmental Statement.

Moray East. (2018). Environmental Management Plan. Moray East Offshore Wind Farm and Associated Offshore Transmission Infrastructure. Document Reference Ref 8460001-PCA0010-MWE-REP-001.

Moray East. (2020). Development Specification and Layout Plan, Moray Offshore Wind Farm and Associated Offshore Transmission Infrastructure. Document approved in 2020. Document Reference Ref 8460001-PCA0010-MWE-REP-003.

RenewableUK. (2014). Offshore Wind and Marine Energy Health and Safety Guidelines. Issue 2.

RenewableUK. (2013a). Safety Circular: Notices to Mariners. Issue 1/Version 1 2016.

RenewableUK. (2013b). Guidelines for the Selection and Operation of Jack-up in the Marine Renewable Energy Industry. Issue 2.

RenewableUK. (2013c). First Aid Needs Assessment: Guidelines for Renewable Energy Projects. Issue 1: 2013.

RenewableUK. (2014). FLOWW Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Liaison.

RenewableUK. (2015a). Wind Turbine Safety Rules, Third Edition. Version 3: 2015 – Issue 1, Issued 31/3/15.

RenewableUK. (2015b). Vessel Safety Guide: Guidance for Offshore Renewable Energy Developers.

RenewableUK. (2016). Integrated Offshore Emergency Response – Renewables (IOER-R). Issue 1.



MORAY EAST

OFFSHORE WINDFARM

Contact

Moray Offshore Windfarm (East) Limited
5th Floor, Atria One, 144 Morrison Street
Edinburgh EH3 8EX
Tel: +44 (0)131 556 7602