Spiorad na Mara Offshore Wind Farm

Offshore Project

Environmental Impact Assessment Report

Outline Offshore Environmental Management Plan, Volume 3

Project No.: SNM-SNM-PAC-PLN-0001

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Contents

List of Tables

1 INTRODUCTION

1.1 OVERVIEW

1.1.1.1 This Outline Offshore Environmental Management (OEMP) has been produced along with the Environmental Impact Assessment Report (EIAR) for the offshore components of the Spiorad na Mara Offshore Wind Farm Project (the 'Offshore Project'). It aims to establish a framework for the Final Offshore Environmental Management Plan which will be prepared post-consent and prior to offshore construction.

1.1.1.2 This Outline OEMP outlines the approach to environmental management and compliance in the marine environment throughout the construction phase of the Offshore Project. It will be superseded by a Final OEMP that will be approved by Scottish Ministers. Other supporting control measures and management plans are discussed in Section 4 of this document. For brevity when referring to requirements that are applicable to both Outline and Final OEMP the document just refers to OEMP.

1.1.2 PROJECT BACKGROUND

1.1.2.1 Spiorad na Mara Limited (hereafter referred to as the 'Applicant') is developing the Spiorad na Mara Offshore Wind Farm (the 'Offshore Project') located to the northwest of the Isle of Lewis/*Eilean Leòdhais* in Scotland/*Alba*.

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

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

1.1.2.2 The EIAR accompanies applications for offshore consents, licences and permissions for the Offshore Project to Marine Directorate - Licensing Operations Team (MD-LOT) under Section 36

(s.36) of the Electricity Act 1989 and the Marine (Scotland) Act 2010, for the offshore infrastructure seaward of MHWS.

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

1.2 PURPOSE OF THE OUTLINE OFFSHORE ENVIRONMENTAL MANAGEMENT PLAN

1.2.1.1 The broad objectives of the OEMP are as follows:

- To provide a mechanism to ensure that measures to mitigate potentially adverse environmental impacts are implemented during construction activities, as presented in **Chapter 25: Summary of Offshore Mitigation/Statement of Offshore EIA Commitments, Volume 2a**;
- To promote and deliver good environmental and social practice in line with industry standards throughout construction of the Offshore Project;
- To provide a framework for compliance auditing and inspection to enable the Applicant to be assured that the necessary levels of environmental performance are being met.

1.2.1.2 The Final OEMP will state the legislative requirements, current standards and good practice measures that define the standards required of the Contractors. Adhering to the Final OEMP does not, however, absolve the Applicant, its Contractors, or Subcontractors from complying with legislation and bylaws relevant to their construction activities.

1.3 LEGISLATION AND GUIDANCE

1.3.1.1 This Outline OEMP has been developed with reference to the following guidance:

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

1.4 SCOPE OF OUTLINE OFFSHORE ENVIRONMENTAL MANAGEMENT PLAN

1.4.1.1 This Outline OEMP covers the following key areas, each of which is detailed in subsequent sections of the document:

- Roles and responsibilities (Section 2);
  - Describes the roles and responsibilities of the Applicant, Contractors, Subcontractors, and supporting personnel in relation to the OEMP. It outlines who is accountable for implementing, monitoring, and ensuring compliance with environmental management

requirements throughout the offshore project. A summary of key roles and their responsibilities is presented, which will be further refined in the Final OEMP.

- Environmental training and awareness (Section 3);
  - Explains the requirements for environmental training and awareness for all personnel involved in the offshore project. This includes induction processes, ongoing training (such as toolbox talks), and the need for Contractors and Subcontractors to demonstrate competence and understanding of environmental obligations. The section also covers leadership, commitment, and the management of Subcontractors to ensure environmental standards are met.
- Communication and reporting (Section 3.3 and 3.4);
  - Details the procedures for internal and external communication regarding environmental matters. Section 3.3 covers communication and stakeholder management, including regular meetings, reporting of incidents, and engagement with regulatory agencies and stakeholders. Section 3.4 addresses complaints and incident management, outlining protocols for recording, investigating, and responding to environmental complaints and incidents.
- Environmental Management and Control Measures (Section 4);
  - Sets out the environmental management and control measures to be implemented during the offshore project. This includes procedures for managing marine archaeology, marine ecology, marine mammals, fisheries liaison, emissions to air, waste management, and hazardous materials. The section also references supporting management plans (e.g., Marine Mammal Mitigation Plan, Marine Pollution Contingency Plan) and describes the monitoring and auditing processes to ensure compliance.

1.5 IMPLEMENTATION OF THE OUTLINE OFFSHORE ENVIRONMENTAL MANAGEMENT PLAN

1.5.1.1 Once approved by Scottish Ministers, the Final OEMP will be implemented and monitored by the Applicant's Head of Construction (or equivalent), Offshore Environmental/Consents Manager (or equivalent), and MD-LOT. The specific responsibilities and authority of these roles are set out in Section 2 (Roles and Responsibilities), which should be referenced for further detail. Throughout this document, where project roles are mentioned, their functions and accountabilities are as defined in Section 2.

1.6 CONSENT COMPLIANCE

1.6.1.1 This Outline OEMP has been submitted as part of the EIAR to support the application for project consent. The Final OEMP will set out the Applicant's commitments to environmental management and provides a framework for compliance with anticipated consent and licence conditions prior to the commencement of offshore construction activities.

1.6.1.2 The OEMP is intended to be a live document, subject to further development and refinement in response to the requirements of relevant consent conditions and in consultation with statutory authorities and stakeholders. Following receipt of consents, a summary table (see blank **Table 1-1**) will be included in the Final OEMP to clearly identify where specific consent condition requirements are addressed within the document, ensuring traceability and transparency.

1.6.1.3 The Final OEMP will set out information or links to information with regard to environmental sensitivities such as protected habitats, human receptors, constraints, site layout plans, and the scope of works to be undertaken, including identification of environmental aspects, impacts, risks and any opportunities.

1.6.1.4 The Applicant has an aspect, impacts, risk and opportunities register as part of the ISO14001 Environmental Management System (EMS), this details potential environmental impacts for construction projects and control measures.

1.6.1.5 The Principal Contractor will be expected to have their own aspects and impacts register as part of their EMS.

1.6.1.6 In addition, **Chapter 25, Volume 2a** identifies the embedded environmental measures that will be implemented as part of the Offshore Project. **Chapter 25, Volume 2a** has been populated with a range of environmental measures including those designed to avoid, prevent, and reduce impacts. These have been informed by the ongoing design evolution process, stakeholder engagement and consultation, good practice and/or are considered to be industry best practice.

1.6.1.7 **Chapter 25, Volume 2a** identifies how each environmental measure will be secured such as through, for example planning conditions and associated documents including this Outline OEMP and supporting management plans (see **Table 1-1**).

Table 1-1 Consent conditions

Consent / Licence Ref.	Licence / consent conditions	Relevant OEMP Section
[To be added post-consent]	**[To be added post-consent]**	**[To be added post-consent]**

2 ROLES AND RESPONSIBILITIES

2.1.1.1 This section outlines the roles and responsibilities of all Applicant, Contractors and Subcontractor personnel in relation to this Outline OEMP.

2.1.1.2 The Applicant personnel, Contractors and Subcontractors must comply with the requirements of the OEMP and all relevant associated documents. The final scope of the roles and contact details for the key individuals listed will also be included in the Final OEMP.

2.1.1.3 **Table 2-1** describes key roles and responsibilities relevant to the OEMP. The roles are indicative and subject to refinement when the approach to construction has been determined by the Applicant. Currently, the role titles are aligned in principle at a framework level with the detailed assignment of roles and responsibilities to be confirmed and expanded in the Final OEMP prior to approval by Scottish Ministers.

Table 2-1: Roles and responsibilities for the implementation of the Offshore Environmental Management Plan

Role Title	Responsibility
Applicant Roles	
Project Director	Responsible for ensuring compliance with and delivery of the OEMP through securing sufficient resources and implementing appropriate processes throughout the Offshore Project. These will be expanded on in the Final OEMP. They have overall accountability to develop and operate the Offshore Project in accordance with all environmental requirements, to prevent pollution and minimise adverse environmental impacts.
Offshore Environmental / Consents Manager	Responsible for managing the discharge of s.36 and marine licence conditions and for managing compliance with the Final OEMP throughout construction. Carries out these duties in liaison with developer and Contractor teams as required.
Stakeholder Engagement Manager	Responsible for facilitating engagement with communities and other relevant stakeholders throughout the project lifecycle and will provide support in the event of environmental complaints.
Quality, Health, Safety and Environment (QHSE) Manager	Responsible for the coordination, management and monitoring of QHSE matters that will complement the OEMP. The QHSE Manager is responsible for providing QHSE support, advice and guidance, will monitor QHSE performance and will be responsible for reducing the environmental effects of the Offshore Project as far as practicable during construction activities.
Health, Safety and Environment (HSE) Lead	The HSE lead is responsible for day-to-day contact with Contractors and carrying out any inspections, audits and investigations.
Head of Construction	Responsible for overseeing the construction activities of the Offshore Project, ensuring the necessary resources are available to the Package Managers to implement the environmental management measures detailed within the OEMP.
Package Manager(s)	Will support the Offshore Environmental / Consents Manager in respect of their specific construction package. Responsible for ensuring sufficient

Role Title	Responsibility
	resources and adequate processes are in place to manage environmental risk and compliance and ensuring that where incidents or non-compliance arises. corrective action is taken promptly.
Contractor, Subcontractor and supporting roles	
Principal Contractor and Subcontractor Environmental Managers	Will ensure compliance with s.36 and marine licence consent conditions in line with the good environmental practice set out in the EIAR, Final OEMP, and associated consent management plans. They will also ensure compliance with all environmental responsibilities in the Final OEMP and supporting documents during construction and report to the Applicant and ECoW.
Independent Environmental Clerk of Works (ECoW)	Responsible for the quality assurance of Final draft versions of all consent plans and programmes required under the s.36 Consent and Marine Licences, providing on-going advice, monitoring and reporting of compliance with the consent conditions and all environmental mitigation and monitoring measures included in the application for the Offshore Project. The ECoW will also be involved with providing environmental training and will establish communication and reporting protocols for issues relating to the environment. These will be expanded on in the Final OEMP post-consent.
Project Archaeologist	The Project Archaeologist will be in place throughout the construction stage, and, if required, during the O&M stage, and will support the Environmental Manager in relation to archaeological matters.
Marine Mammal Observer (MMO)	A MMO may be in place during noise generating activities, such as piling if required. The MMO will carry out visual monitoring for marine mammals prior to and during piling activity to determine the presence of marine mammals. Will provide advice to vessel crews to ensure compliance with s.36 and marine licence conditions and compliance with the Final OEMP.
Passive Acoustic Monitoring (PAM) Operators	The PAM operator's primary role is to acoustically detect marine mammals within the mitigation zone using a hydrophone array capable of detecting both high- and low-frequency signals to support distance estimation. Will provide advice to vessel crews to ensure compliance with s.36 and marine licence conditions and compliance with the Final OEMP.
Company Fisheries Liaison Officer (CFLO)	The CFLO will develop a positive working relationship with relevant fisheries stakeholders and will be the interface between the Applicant, Contractors and Subcontractors and the fisheries stakeholders. They may also represent the Applicant at meetings. The CFLO will act as a primary point of contact for the fisheries stakeholders where communication with the Applicant is required and will also disseminate information potentially via the Fishing Industry Representatives (FIRs). The CFLO will maintain a database of fisheries contacts and organisations to ensure Offshore Project related information is circulated in a timely manner.
Offshore Fisheries Liaison Officer (OFLO)	The OFLO is responsible for minimising any at-sea conflict between the Offshore Project and fishing activities. The OFLO will be stationed on construction vessels, as required, and will act as an on-site point of communication for fishing vessels. The OFLO will maintain contact with the

Role Title	Responsibility
	CFLO and the Applicant to communicate relevant information to fishing vessels and provide advice to vessel crews.
Fishing Industry Representatives (FIRs)	The FIRs will be the direct point of contact for local fishers and will liaise with the CFLO. The FIRs will circulate information from the Applicant and the CFLO, as required. The FIRs may attend fisheries stakeholder meetings and will liaise directly with local fishers around their concerns on the Offshore Project to report back to the CFLO. These will be expanded on in the Final OEMP post consent.

3 ENVIRONMENTAL TRAINING AND AWARENESS

3.1 TRAINING AND COMPETENCE

3.1.1.1 All Contractors, Subcontractors and their suppliers shall be required to observe the relevant provisions of the OEMP and provide evidence on how they would ensure its requirements are implemented and monitored.

3.1.1.2 Compliance with the OEMP shall not absolve Contactor(s) or Subcontractors from the obligation of compliance with all legislation and byelaws relating to their construction activities.

3.1.1.3 All offshore construction resources deployed on the Offshore Project shall receive training from the Contractor(s) detailing their responsibilities for minimising the risk to the environment and implementing the measures set out in the OEMP.

3.1.1.4 The Contractor(s) will require that Subcontractors deploy an appropriately qualified and experienced workforce and shall be responsible for identifying the training needs of their personnel. Training will include site briefings and toolbox talks as necessary to equip the workforce with the relevant knowledge on health, safety and environmental topics.

3.1.2 SUBCONTRACTOR MANAGEMENT

3.1.2.1 The Final OEMP will set out how the Contractor is expected to manage their Subcontractors. This may range from the procurement and selection processes through to the assessment of performance on the vessel. For example, expectations of Contractors working on behalf of Applicant are primarily detailed in this and the following documents:

- Contract Schedules including specific environmental requirements;
- Environmental Policy;
- This Outline OEMP and the associated Commitments Register;
- Linked management plans (e.g., Marine Mammal Mitigation Plan, Marine Pollution Contingency Plan, Invasive Non-Native Species Management Plan, etc.), as referenced in Section 4.

3.1.2.2 Note: Contractors should ensure compliance with the commitments and requirements as set out in this OEMP, the Commitments Register, and the relevant linked plans.

3.1.3 LEADERSHIP AND COMMITMENT

3.1.3.1 To demonstrate and foster a culture of commitment to the environment there will be:

- Sufficient resources (personnel, time, budget, equipment) will be assigned by the Applicant to fulfil the requirements of the OEMP and associated Management Plans;

- Support provided by the Offshore Environmental / Consents Manager (see **Table 2-1**) to other managers with environmental responsibilities regardless of employer;
- Regular communication of project environmental performance and encouragement of the workforce to identify and implement improvement opportunities;
- Sharing of environmental lessons learned across the Offshore Project;
- Identification and management of environmental risks;
- Appropriate incident investigation and corrective action management.

3.1.4 ENVIRONMENTAL INDUCTION AND TRAINING

3.1.4.1 All Offshore Project team members engaged in construction planning and execution will receive an appropriate induction and training to ensure that they are aware of their environmental responsibilities and are competent to carry out the work. Environmental requirements will be explained to deployed personnel during the Offshore Project induction, on-going training via toolbox talks, briefings and notifications as required. Records will be made to demonstrate competence and training of deployed personnel; this includes maintaining copies of training completion certificates and attendance/sign-off sheets for toolbox talks and other awareness programmes. Records will be managed in line with data protection legislation.

3.1.4.2 An environmental induction would be integrated into the Offshore Project's induction as part of the HSE induction and as a minimum would include:

- The significant environmental aspects and potential impacts of their work;
- How to submit environmental improvement ideas, near misses and incidents;
- Emergency response procedures;
- The implications of not complying with environmental requirements;
- Environmental site rules and requirements.

Vessel Inductions

3.1.4.3 The overarching project induction will include reference to compliance with the relevant requirements and conditions of the Offshore Project including those specific to vessel management practices.

3.1.4.4 A vessel induction will take place with all vessel personnel present and include an environmental component. The Contractor's project team shall nominate designated personnel to be responsible for the preparation and delivery of site induction and maintaining attendee records. Further detail is available in **Outline Navigational Safety and Vessel Management Plan, Volume 3**.

3.1.4.5 The environmental component of the vessel induction is expected to include reference to (but not be limited to):

- Environmental management contacts;
- Site specific environmental sensitivities;
- Waste management arrangements;

- Hazardous material management;
- Fuel, oil, and chemical management;
- Environmental emergency response (see **Marine Pollution Contingency Plan, Volume 3**);
- Reporting of incidents and complaints.

3.2 DOCUMENTATION AND RECORDS MANAGEMENT

3.2.1 DOCUMENTED INFORMATION

3.2.1.1 Suitable and sufficient documentation will be produced to ensure that compliance to legal and other obligations, including those set within consent conditions, permits, licences and authorisations. Documentation will be produced that provides evidence of compliance against the statements written within procedures and management plans.

3.2.1.2 As a minimum, documentation will include the title, date, author, reference number and version history. The author shall select the most appropriate format, language and media; and the documentation will be protected from damage, loss of data and breaches in confidentiality. Documents would be located conveniently for use (if applicable), for example, Risk Assessment Method Statement (RAMS) located at the worksite.

3.2.1.3 Compliance obligations, such as those within licences, may require documentation to be displayed in specific locations. If there are specific requirements for the display or access to documentation, this will be written within relevant management plans and communicated to the relevant Offshore Project personnel, Contractors, or other relevant persons. There may also be requirements to engage regulators and share documentation at regular construction programme intervals and during particular periods (e.g., seasonal or activity-specific phases). These requirements will be defined within the relevant management plans and communicated to Offshore Project personnel, Contractors, or other relevant persons.

3.2.2 RECORDS

3.2.2.1 Contractors shall retain all relevant HSE records relating to its work, in line with relevant legislation, and access shall be given to these records on request. Some examples of records include:

- Risk assessments;
- Training records;
- Evidence of consultation/communication with stakeholders;
- Maintenance records (proactive and reactive);
- Marine licence acknowledgement forms;
- Monitoring and measuring results;
- Incidents, near misses and observations;
- Audit results;
- Management review outputs;

- Corrective actions reports.

3.2.2.2 Although not an exhaustive list, this indicates the variety of records required for environmental management. The record keeper will ensure that the records are suitable and sufficient to ensure that they fulfil their purpose. This includes being completed correctly and, in the detail, necessary to fulfil the associated obligations. Records will also be stored for the length of time required by any associated obligations. Where there are no obligations for record retention, the record will be kept for the lifetime of the Offshore Project or as stated otherwise.

3.3 COMMUNICATION AND STAKEHOLDER MANAGEMENT

3.3.1 INTERNAL COMMUNICATION

3.3.1.1 Regular progress meetings will be held before and during construction, between the Applicant's Environmental Manager/Offshore Consents Manager (and the ECoW as required) and relevant Contractors/Subcontractors. During these progress meetings, the Applicant Environmental Manager/Offshore Consents Manager and/or Contractor's Environmental Manager will present a section on environmental management and consents compliance. See **Table 2-1** for roles and responsibilities.

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

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

3.3.1.4 Prior to construction, this document will be updated to include flow diagrams that outline the communication pathways, to ensure general internal compliance and also during specified occurrences/incidents, such as an environmental issue. Timescales for communication and reporting of any issues will be confirmed with Contractors prior to construction as required.

3.3.2 EXTERNAL COMMUNICATION (STAKEHOLDER AND COMMUNITY)

3.3.2.1 The Applicant, supported by the Contractor and Subcontractors, will facilitate regular consultation in accordance with the Final OEMP. The Applicant will carry out external communications, notifications and reporting in relation to Offshore Project activities in line with the commitments made in the EIAR and in compliance with the requirements of the consent conditions.

3.3.2.2 The appointed OFLO will be contactable by commercial fisheries stakeholders, and will act as a point of contact for the Construction Project Management Base and ports/marinas etc along the coast.

3.3.3 EXTERNAL COMMUNICATION (REGULATORY AGENCIES)

3.3.3.1 Consultation with a range of environmental or other regulatory agencies may be required throughout the construction of Offshore Project. The Offshore Environmental/Consents Manager (see **Table 2-1**) will consult and cooperate with all relevant regulatory agencies in meeting the environmental conditions as required under legal obligations and consents (as they become relevant).

3.4 COMPLAINTS AND INCIDENT MANAGEMENT

3.4.1 COMPLAINTS PROTOCOL

3.4.1.1 The Applicant, Contractors and Subcontractors must ensure that any complaints are accurately recorded and reported to the designated members of the Project Team. They shall be investigated promptly and responses and/or corrective actions implemented.

3.4.1.2 The Final OEMP will detail the procedure in place to report complaints by members of the public in relation to offshore works.

3.4.1.3 The Final OEMP will include a detailed complaints procedure specifying how complaints are to be recorded, reported, investigated, and closed out. This will set out designated points of contact, reporting channels (e.g., email, phone, web form), timescales for response, and responsibilities for investigation and corrective action. The Outline OEMP commits to this framework, with full details to be developed post-consent in line with best practice and regulatory requirements.

3.4.1.4 Frequent contact will be maintained with the local community to provide effective feedback regarding perceived environmental issues. This will be carried out in liaison with the Stakeholder Engagement Manager and CFLO (see **Table 2-1**). Further details will be provided in the Final OEMP.

3.4.2 ENVIRONMENTAL INCIDENT RESPONSE

3.4.2.1 The procedures to adhere to following an environmental incident (excluding marine pollution incidents) will be provided in the Environmental Incident Reporting Procedure which will be produced, approved and annexed to the Final OEMP prior to the start of the construction activities.

3.4.2.2 The procedures to report spill or pollution events are provided in the Marine Pollution Contingency Plan (MPCP) (see **Marine Pollution Contingency Plan, Volume 4**).

4 ENVIRONMENTAL MANAGEMENT AND CONTROL MEASURES

4.1 INTRODUCTION

4.1.1.1 This section will outline the controls and procedures to be implemented to manage and mitigate the environmental impacts associated with the Offshore Project. Commitments identified in the EIAR will be reformatted as necessary to facilitate practical application by Contractors and Subcontractors. This approach is consistent with the guidance provided by the IEMA (now the Institute of Sustainability and Environmental Professionals), as set out in their Practitioner Guide (IEMA, 2008), which states:

- The overall objective of an Environmental Management Plan is to provide a continuous link or 'bridge' between the design phase of the Offshore Project, conditions attached to consents, Proposed Development construction, and into the operational phase. (IEMA, 2008)

4.1.1.2 The Final OEMP will serve as the principal document for delivering the Offshore Project's environmental commitments and will be integrated with the broader Project Environmental Management System.

4.1.1.3 The Final OEMP will provide the framework for implementing the commitments set out in the EIAR and the conditions imposed as part of the S36 consent once granted. All Contractors and Subcontractors will be required to operate under an Environmental Management System that is appropriate to their scope of work and aligned with the overarching broader Project Environmental Management System.

4.1.1.4 A comprehensive register of embedded environmental measures is included in **Chapter 25, Volume 2a**. This register documents all embedded measures and Offshore Project commitments relevant to each stage of the Offshore Project and will be updated post-consent to reflect any additional consent conditions.

4.1.1.5 As the Commitments Register is developed post consent from the commitments made within **Chapter 25, Volume 2a** and in accordance with consent conditions, adherence to the OEMP and associated plans will ensure compliance with the environmental requirements of the awarded consents for the Offshore Project.

4.2 KEY ENVIRONMENTAL ASPECTS OF THE OFFSHORE PROJECT

4.2.1 MARINE ARCHAEOLOGY

4.2.1.1 The procedures to be followed on discovering any marine archaeological artefacts during the construction and O&M stages of the Offshore Project are set out in **Outline Offshore Written Scheme of Investigation and Outline Protocol for Archaeological Discoveries, Volume 3**. The Written Scheme of Investigation is a project-specific document that sets out the procedures and

standards for the identification, protection, and recording of archaeological features and finds during offshore construction activities. It ensures that procedures are in place for the discovery and reporting of archaeological artefacts, and that awareness of sensitive sites is communicated to the designated members Project Team. Further details will be developed in the Final OEMP.

4.2.2 MARINE ECOLOGY

4.2.2.1 The Offshore Project may interact with several ecological receptors including marine mammals, seabirds, benthic communities and fish. Embedded mitigation for these receptors is detailed within the EIAR (notably **Chapter 25, Volume 2a**), and will be captured within the Final OEMP and associated management plans (Marine Mammal Mitigation Protocol, Final Marine Pollution Contingency Plan, Offshore Invasive Non-Native Species Management Plan and Fisheries Mitigation, Monitoring and Communication Plan). At outline stage, these receptor groups are addressed through the overarching commitment to comply with embedded EIAR measures and through relevant linked plans referenced in both the Outline and the Final OEMP.

4.2.2.2 In addition, if a disturbance to ecological receptors occurs as a result of Project activities, such as harm to a marine mammal or the discovery of deceased fish or birds, then the incident must be reported immediately to the Applicant's Offshore Environmental Consents Manager or the Independent ECoW. The report should include, at a minimum, a description of the activity being undertaken, the weather conditions at the time, and, where possible, supporting photographs. The Offshore Environmental Consents Manager or Independent ECoW will liaise with the relevant regulatory authority as required.

4.2.2.3 The comprehensive register of embedded environmental measures is provided in **Chapter 25, Volume 2a**.

4.2.3 OTHER MARINE USERS

4.2.3.1 The approach to managing and mitigating potential impacts on other marine users, including commercial fisheries, recreational users, and navigational interests, is set out in the following Plans:

- **Outline Navigational Safety Vessel and Management Plan, Volume 3**;
- **Fisheries Mitigation, Monitoring and Communication Plan, Volume 3**;
- **Outline Lighting and Marking Plan, Volume 3**.

4.2.3.2 The **Outline Navigational Safety Vessel and Management Plan, Volume 3** is designed to optimise navigational safety and ensure that vessel operations are managed to minimise disturbance to marine mammals, birds, and other marine users. All marine vessel operations must be planned and executed in accordance with the approved mitigation and management procedures outlined in this plan.

4.2.3.3 The **Fisheries Mitigation, Monitoring and Communication Plan, Volume 3** details the process for ongoing consultation and engagement with local, regional, and national fishing organisations,

as well as individual fishers. This includes the appointment of dedicated roles such as the OFLO, CFLO, and the FIRs to facilitate effective communication and address any concerns raised by the fishing community.

- Key measures adopted by these plans include:
- Establishment of safety zones around offshore infrastructure;
- Timely and effective notification of activities to all relevant marine users, including the distribution of Notices to Mariners (NtMs), Kingfisher notifications, and other navigational warnings;
- Clear processes for marine coordination of all vessels and activities;
- Appropriate marking and lighting of vessels and project infrastructure;
- Vessel transit planning and management of interactions with commercial fisheries;
- Placement of physical notices at marinas and harbours in the vicinity of the Offshore Project, and distribution of information to recreational clubs and other stakeholders.

4.2.3.4 The comprehensive register of embedded environmental measures is provided in **Chapter 25, Volume 2a**.

4.2.4 EMISSIONS TO AIR

4.2.4.1 Vessel emissions associated with Offshore Project will comply with International Convention for the Prevention of Pollution from Ships (MARPOL) Annex VI requirements (IMO, 1973) in relation to ozone depleting substances regulations, nitrogen oxide, sulphur oxide and particulate and volatile organic compounds. Where relevant (as specified by MARPOL Annex VI), vessels must have a valid International Air Pollution Prevention (IAPP) certificate.

4.2.5 WASTE MANAGEMENT

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

- Analysis of the waste arisings/material surpluses;
- Specific waste management objectives for the Offshore Project;
- Methods proposed for prevention, reuse and recycling of wastes;
- Material handling procedures;
- Proposals for education of workforce and plan dissemination programme.

4.2.5.2 The WMP must be provided to the Applicant, by the Contractors and Subcontractors, for approval prior to commencement of the activities.

4.2.6 OILS, FUELS AND CHEMICAL MANAGEMENT

4.2.6.1 It is the responsibility of each Contractor to adhere to consent requirements and have in place adequate controls for the delivery, storage and use of fuels, oils and chemicals on vessels and other materials as required. This includes checks that chemicals to be used comply with relevant regulations.

4.2.6.2 Contractors must retain and maintain a Control of Substances Hazardous to Health (COSHH) Register including material safety data sheets for all hazardous substances on site.

4.2.6.3 Where practical, the Contractor must use products that biodegrade quickly to ensure impacts to the environment are minimised as a minimum standard. If a non-biodegradable product is proposed for use, the Contractor must provide justification for its use and that no other option is viable.

4.2.6.4 Each Contractor must consider the delivery, storage and handling of hazardous materials and in particular oils and fuels, taking into consideration applicable legal requirements and best practice guidelines including (but not limited) to:

- Selection of chemicals that have the lowest impact to the environment where practicable and volumes of hazardous substances stored to be limited to be fit for purpose and minimise risk;
- All Contractors shall detail with their environmental management plans specific controls necessary for the delivery, storage and handling of hazardous materials relevant to their works, and in particular oils and fuels, taking into account the requirements of the Control of Pollution (Oil Storage) (England) Regulations (2001);
- Oils and chemicals must be clearly labelled. A register of hazardous substances shall be kept on site, the register will include the product/substance material safety data sheets;
- Storage, and use handling of chemicals in line with manufacturer's instructions/recommendations and material safety data sheets guidance, the COSHH Regulations (2002) and regulator guidance on the storage of chemicals;
- Activities involving the handling of large quantities of hazardous materials, such as deliveries and refuelling, will be undertaken by designated and trained personnel;
- Secondary containment capacity for substances dangerous to the environment must be 110% of the largest container or 25% of the total volume of accumulated containers (whichever is greatest). Spill kits of sufficient capacity to deal with volumes stored to be fully stocked and readily available;
- Vessels of more than 400 gross tonnage should maintain an oil record book and the sulphur content of fuels must comply with MARPOL (International Convention for the Prevention of Pollution from Ships) Annex VI (IMO, 1973) requirements in relation to Sulphur Emission Control Areas (SECAs) and hold a valid International Oil Pollution Prevention Certificate (IOPP);
- Recorded regular preventative maintenance shall be in place for all plant and equipment (for example, scheduled maintenance).

4.2.6.5 Activities involving the handling of large quantities of hazardous materials, such as deliveries and refuelling, must have a detailed RAMS in place and be undertaken by designated and trained personnel. Personnel engaged with fuel transfer will be suitably competent with suitable controls in place to limit the risk of fuel spillage.

4.3 ENVIRONMENTAL MONITORING AND AUDITING

4.3.1.1 To ensure compliance with the Final OEMP and associated s.36 consent and marine licences, the Applicant and its Contractors will develop an internal monitoring programme for the Offshore Project, which will comprise both inspections and audits. The Applicant and its Contractors will operate quality assurance mechanisms to monitor the success or otherwise of the systems they have in place through a Safety, Health, Environment and Quality system.

4.3.1.2 Observations from inspections and audits shall be collected, recorded in inspection or audit template reports, and issued to Contractors for closure of actions. The close out of these items will be required within designated timeframes.

4.3.1.3 Each Contractor and Subcontractor working on the Offshore Project will maintain adequate records of environmental information and audits to demonstrate compliance with both legal requirements and the Applicant's environmental requirements.

4.3.1.4 The Applicant will assess compliance with relevant environmental legislation and consent commitments as part of the Offshore Project's monitoring programme.

4.3.1.5 Audits will focus on compliance with the Final OEMP and will be completed by the Applicant on key construction packages. Audits will be agreed and arranged with the Contractors ahead of any vessel mobilising in relation to the Offshore Project. All actions raised from the audit will be recorded by the Applicant and the Contractors must address and close out actions in a timely manner.

4.3.1.6 A monthly report will be required from each Contractor and Subcontractor which will be recorded and monitored by the Applicant and ECoW. Required Data will be as follows:

- Environmental Near Miss Incidents;
- Environmental Incidents;
- Notice from Regulatory Authority;
- Confirmed Environmental Complaint.

4.3.1.7 The Applicant's Environmental Manager/Offshore Consents Manager (where appropriate) will develop specific checklists, informed by review of the Final OEMP and Contractor RAMS, to facilitate the audit process.

4.3.1.8 The Applicant may carry out environmental audits at any time, and at regular intervals. During construction, the Applicant's Environmental Manager/Offshore Consents Manager will undertake environmental audits at regular intervals and will maintain a record of all completed audit forms,

and records of corrective action and close outs. The Applicant's Environmental Manager/Offshore Consents Manager will also undertake audits of Subcontractors, and provide an audit within 2 weeks of the audit being undertaken. Details and findings of all monitoring and audit activities will be recorded. Any observations or corrective actions arising from audits and inspections will be addressed, with procedures updated in the Final OEMP as required.

4.3.1.9 The Applicant's Environmental Manager/Offshore Consents Manager will be delegated sufficient powers under the construction contract so that they will be able to instruct the Contractor to stop works and to direct the carrying out of emergency mitigation/clean-up operations.

4.3.1.10 The Applicant will also have stop works authority, in the event of a non-conformance identified during an audit.

5 GLOSSARY OF TERMS AND ABBREVIATIONS

5.1.1.1 A list of key terms, abbreviations and acronyms used in this appendix are provided in **Table 5-1** and **Table 5-2**.

Table 5-1: Acronyms and abbreviations

Term	Definition
CFLO	Company Fisheries Liaison Officer
COSHH	Control of Substances Hazardous to Health
ECoW	Environmental Clerk of Works
EIAR	Environmental Impact Assessment Report
FIR	Fishing Industry Representative
HSE	Health, Safety and Environment
IAPP	International Air Pollution Prevention
IEMA	Institute of Environmental Management and Assessment
INNSMP	Invasive Non-Native Species Management Plan
IOPP	International Oil Pollution Prevention
MARPOL	International Convention for the Prevention of Pollution from Ships
MD-LOT	Marine Directorate – Licensing Operations Team
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Mammal Observer
MPCP	Marine Pollution Contingency Plan
NtM	Notices to Mariner
O&M	Operation and Maintenance
OCAS	Offshore Cable Area of Search
OEMP	Offshore Environmental Management Plan
OFLO	Offshore Fisheries Liaison Officer
Outline OEMP	Outline Offshore Environmental Management Plan
OWF	Offshore Wind farm
PAD	Protocol for Archaeological Discoveries
PAM	Passive Acoustic Monitoring
QHSE	Quality, Health, Safety and Environment
RAMS	Risk Assessments and Method Statement
SEAR	Safety and Environmental Awareness Report
SECA	Sulphur Emission Control Areas
WFD	Water Framework Directive
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator

Table 5-2: Glossary

Term	Meaning
The Applicant	Spiorad na Mara Limited (the Project owner)
Environmental Impact Assessment Report (EIAR)	The Environmental Impact Assessment Report (EIAR) prepared to assess the likely significant effects of the Offshore Project on the environment.
Marine Directorate - Licensing Operations Team (MD-LOT)	The regulator for determining marine licence applications on behalf of the Scottish Ministers in the Scottish inshore region (between 0 and 12 nautical miles) under the Marine (Scotland) Act 2010.
Mean High Water Springs (MHWS)	The average throughout a year of the heights of two successive high waters during those periods of 24 hours (approximately once a fortnight) when the tidal range is greatest.
Offshore Cables	Electrical and communication cables located within the Offshore Cable Area of Search (OCAS) and Array Area.
Offshore Cable Area of Search (OCAS)	The area within which the offshore cable infrastructure between the Array Area and Landfall will be located.
Offshore Project (Offshore Components of the Project)	Components of the Project seaward of MHWS. Includes Array Area plus Offshore Cable Area of Search.
Operation and Maintenance (O&M) phase	The period during which a development is operational and being maintained.
Section 36 Consent	Consent that can be granted under s.36 of the Electricity Act 1989 for the construction or extension, and operation, of an electricity station.
Wind Turbine Generator (WTG)	The wind turbines that generate electricity consisting of tubular towers and blades attached to a nacelle housing mechanical and electrical generating equipment.

6 REFERENCES

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