



BERWICK BANK WIND FARM OFFSHORE ENVIRONMENTAL IMPACT ASSESSMENT

APPENDIX 22, ANNEX A: OUTLINE MARINE POLLUTION CONTINGENCY PLAN



Document Status

Version	Purpose of Document	Authored by	Reviewed by	Approved by	Review Date
FINAL	Final	RPS	RPS	RPS	October 2022

Approval for Issue

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1. INTRODUCTION

1.1. PURPOSE

1. This outline Marine Pollution Contingency Plan (MPCP) outlines the pollution response arrangements for the offshore infrastructure associated with the Berwick Bank Wind Farm (hereafter referred to as the Proposed Development) during the construction and operation and maintenance phases.
2. The overall purpose of this MPCP is to provide a list of procedures to safeguard the marine environment and respond to any potential accidental pollution event during the above phases of the Proposed Development. The procedures for safeguarding the marine environment during the decommissioning phase will be provided in a separate MPCP once the final decommissioning plan and methodologies are developed.
3. This MPCP document represents best practice for pollution preparedness, and it is widely regarded within industry as best practice to have a MPCP in place where there is a risk of pollution, even when this is considered to be a low risk.
4. Where a marine pollution incident is part of a wider emergency such as a fire or explosion, reference should also be made to the Emergency Response Co-operation Plan (ERCoP), which will be produced post consent.

1.2. PROJECT BACKGROUND

5. The Proposed Development is an offshore wind farm located in the outer Firth of Forth and Firth of Tay, approximately 37.8 km east of the Scottish Borders coastline (St. Abb's Head) and 47.6 km to the East Lothian coastline (see Figure 1.1).
6. The Proposed Development parameters have been selected from the Project Design Envelope (PDE) as assessed in the Offshore EIA Report. The Proposed Development will consist of the following:
 - up to 307 wind turbine foundations (piled/suction caisson jackets) attached to the seabed, plus ancillary equipment such as J-tubes, platforms and personnel access facilities;
 - up to 307 wind turbines (each comprising a tower section, nacelle and three rotor blades);
 - up to ten Offshore Substation Platforms (OSPs)/Offshore converter station platforms and associated foundations (piled/suction caisson jackets) attached to the seabed, plus ancillary equipment which may include J-tubes and personnel access facilities;
 - up to ten OSP/Offshore converter station platforms topsides housing electrical infrastructure (for the purpose of this report, the term OSP/Offshore converter station platforms is used to refer collectively to the platform structure and the topside equipment);
 - a network of inter-array cabling and interconnector cabling between the ten OSPs/Offshore converter station platforms;
 - up to eight offshore export cables utilising the consented offshore export cable corridor; and
 - scour protection and cable protection.
7. The wind turbines will be connected to each other by a network of inter-array cables, also connecting into the OSPs/Offshore converter station platforms. The offshore export cables will transfer the electricity from the OSPs/Offshore converter station platforms to the Skateraw landfall, where they will connect to the onshore infrastructure.

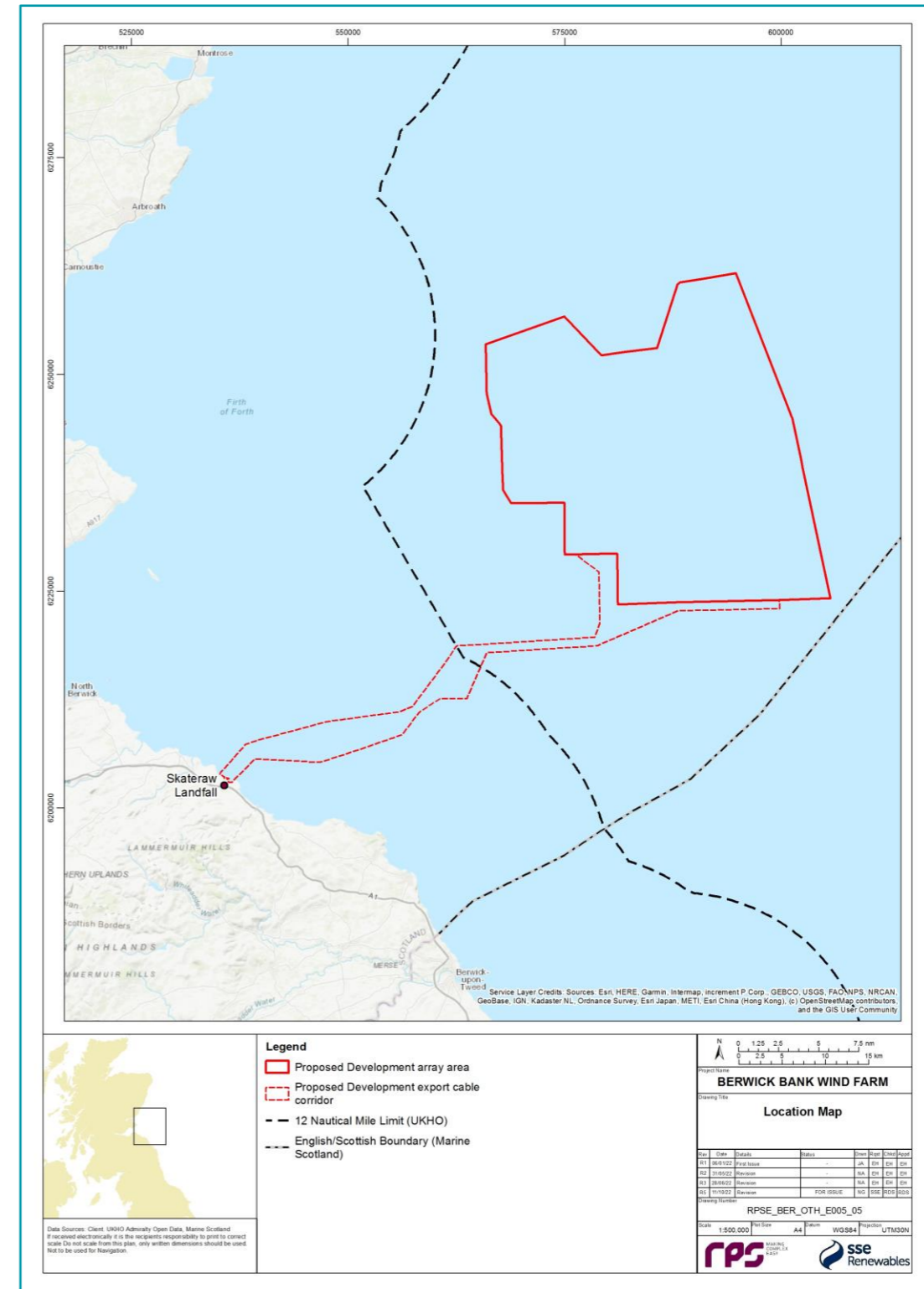


Figure 1.1: Location of the Proposed Development

1.3. SCOPE

8. This MPCP is a sub-plan to the Proposed Development Environmental Management Plan (EMP) and covers measures to protect personnel and the marine environment relating to the marine works that will be undertaken as part of the Proposed Development (up to mean high water springs (MHWS)) during the construction and operation and maintenance phases.
9. The MPCP provides the following information and guidelines to aid a response to an accidental release of pollutants into the marine environment resulting from activities associated with the Proposed Development:
 - a risk assessment of the potential pollution sources and the likelihood of an accidental release (section 4.2); and
 - oil spill response procedures and actions (section 5.1).
10. The information and guidelines presented in this draft MPCP will be reviewed in consultation with the Maritime and Coastguard Agency (MCA), Marine Scotland - Licencing Operations Team (MS-LOT) and Scottish Environment Protection Agency (SEPA) and will be re-submitted as a final draft prior to commencement of construction.
11. All personnel and Contractors (including any sub-contractors) involved in the Proposed Development will be required to comply with this MPCP and will be provided with a copy of the MPCP and will be familiarised with the content, including roles and responsibilities, through toolbox talks.
12. All vessel contractors associated with the Proposed Development will also be expected to implement their own Ship-board Oil Pollution Emergency Plans (SOPEPs) (if applicable under the International Convention for the Prevention of Pollution from Ships (MARPOL) Convention (IMO, 2019)) or their vessel specific spill plans in the event of an accidental marine pollution incident. This also applies to port side activities, with port authorities responsible for implementing specific spill/pollution plans.

1.4. CONSENT CONDITIONS

13. Table 1.1 will summarise the anticipated consent conditions included in the Marine Licence and Section 36 Consent in relation to marine pollution. All consent conditions listed in any Marine Licence and Section 36 consent will be included in Table 1.1 once known.

Table 1.1: Consent Conditions to be Discharged by this MPCP

Consent Document	Consent Condition Reference	Consent Condition	Reference to Relevant Section of this MPCP
Marine Licence (Licence No, XXX)	8.7	The Licence Holder must ensure that pollution prevention best practice is adhered to at all times.	Section 4

1.5. DOCUMENT REVISION

14. The Applicant will refine the MPCP before commencing construction and review this plan on an annual basis thereafter, or after significant legislative or procedural changes that would require updates to be made to this MPCP.
15. In addition the MPCP will be further refined in preparation for the operation and maintenance phase of the Proposed Development.

2. SUMMARY OF DESIGNED-IN MEASURES, MITIGATION AND MONITORING INCLUDED IN THE OFFSHORE EIA REPORT

16. Table 2.1 provides a summary of the designed in measures identified in the Offshore EIA Report relevant to the MPCP.

Table 2.1: Designed in Measures Relevant to the MPCP

Designed in Measures	Justification
Development of, and adherence to, an EMP, including MPCP	To reduce the potential for release of pollutants from construction, operation and maintenance, and decommissioning phases as far as reasonably practicable. These will likely include designated areas for refuelling where spillages can be easily contained, storage of chemicals in secure designated areas in line with appropriate regulations and guidelines, double skinning of pipes and tanks containing hazardous substances, and storage of these substances in impenetrable bunds. The MPCP will require, in the unlikely event that a pollution even occurs, that plans are in place to respond quickly and effectively to ensure any spillage is reduced as far as reasonably practicable and effects on the environment are ideally avoided or reduced as far as reasonably practicable.
An EMP will be prepared and implemented during the construction, operation and maintenance and decommissioning phases of the Proposed Development. The EMP will include Proposed Development mitigation/monitoring measures and commitments and a MPCP which will include key emergency contact details (e.g. Environmental Protection Agency (EPA)).	Implementation of these measures will reduce the accidental release of contaminants from vessels as far as reasonably practicable, thus providing protection for marine life across all phases of the Project Development.
	Measures will be adopted to ensure that the potential for release of pollutants from construction, operation and maintenance phases is minimised. These will likely include: designated areas for refuelling where spillages can be easily contained, only using chemicals included on the approved Centre for Environment Fisheries and Aquaculture Science (Cefas) list under the Offshore Chemical Regulations 2002, storage of chemicals in secure designated areas in line with appropriate regulations and guidelines, double skinning of pipes and tanks containing hazardous substances, and storage of these substances in impenetrable bunds. In this manner, the potential for release of contaminants will be strictly controlled, thus providing protection for marine life across all phases of the offshore wind farm development.

3. ROLES AND RESPONSIBILITIES

3.1. THE APPLICANT

17. The Applicant will contractually require Contractors and Subcontractors to take responsibility for pollution events originating from the Proposed Development.

3.2. THE APPLICANT ENVIRONMENTAL MANAGER

18. The Applicant Environmental Manager for each phase of the Proposed Development is responsible for the overall preparation and implementation of the MPCP, including the following duties:
- preparing and maintaining the MPCP to an agreed schedule; and
 - ensuring Contractors develop MPCPs (which should include adequate pollution prevention and spill response procedures), and ensuring that these are reviewed to an agreed schedule and implemented throughout operations.
19. The Applicant Environmental Manager will review and update the MPCP as necessary during the construction phase of the Proposed Development to include any new information. Furthermore, this MPCP will also be reviewed and amended after construction is completed, to make it applicable to the operation and maintenance phase of the Proposed Development.
20. The Applicant will appoint an Environmental Clerk of Work (ECoW), Marine Coordinator and a dedicated Spill Response Contractor for the Proposed Development.
21. Following completion of construction, the Applicant Environmental Manager will ensure the MPCP is reviewed and amended annually or after significant legislative or procedural changes that would require updates to be made to this MPCP, as necessary for the operation and maintenance phase of the Proposed Development.
22. The Applicant Environmental Manager will review and update this MPCP as required and to the agreed schedule during the construction phase of the Proposed Development (e.g. to take into account any new information, that may become available).
23. In the event of any oil or chemical spill to the marine environment, following the completion of remedial action, an internal meeting will be held to close out the incident and ensure any lessons are learnt, which will be led by the Applicant Environmental Manager.

3.3. THE ENVIRONMENTAL CLERK OF WORK

24. The Applicant will be required to appoint an Environmental Clerk of Work (ECoW). The main responsibilities of the ECoW will include:
- Quality Assurance and approval of the Applicants MPCP and ensuring compliance with consent conditions, the EMP and other relevant consent plans;
 - review and approve all updates and amendments to the MPCP made by the Environmental Manager during all phases of the Proposed Development;
 - inductions and toolbox talks to Contractors and Subcontractors to ensuring implementation of the MPCP in accordance with consent conditions;
 - managing ongoing Contractor spill response (through liaison with Contractor);

- ensuring delivery and compliance with this MPCP, including named personnel, appropriate resourcing and required processes are in place;
- ensuring delivery of this MPCP in compliance with consent conditions, the EMP and other relevant consent plans as well a relevant legislation and policy; and
- notifying statutory bodies of a spill, such as MCA, MS-LOT and SEPA and any relevant local authorities.

3.4. MARINE COORDINATOR

25. A Marine Coordinator will be appointed by the Applicant before construction at the Proposed Development commences. As well as coordinating the day to day vessel activity at the Proposed Development, the Marine Coordinator will be the main point of contact should an emergency or pollution event occur.
26. As such, the Marine Coordinator will assist with the ongoing response in the event of a pollution incident from a vessel or vessel related activity, ensuring close communication between the Applicant and relevant Contractors/subcontractors.
27. The Marine Coordinator will also oversee the pollution response and any required clean-up operations should a pollution event occur from a Project installation.

3.5. CONTRACTOR AND SUBCONTRACTOR

28. Most of the construction and operation and maintenance activities at the Proposed Development will be carried out by Contractors and/or Subcontractors, thus the Applicant will contractually require they are familiar with this MPCP.
29. Furthermore, each Contractor/Subcontractor will be expected to prepare their own MPCP before activities commence at the Proposed Development. The Contractor/Subcontractor MPCP will be expected to comply with this MPCP and also to prepare their own spill response arrangements, including reporting and response procedures. Each Contractor/Subcontractor will be expected to maintain a spill risk register for all equipment to be used at the Proposed Development.
30. The Contractor/Subcontractor MPCP will be expected to be submitted to and reviewed/approved by the Applicant before being implemented at the Proposed Development. Once approved, it is expected it will be subject to an appropriate six-monthly review/update cycle and re-approved by the Applicant following each updated prior to implementation.
31. All Contractor/Subcontractors will be expected to ensure relevant personnel are trained in pollution prevention and response and that vessel contain appropriate pollution response equipment.
32. All vessels working in the Proposed Development will be subject to the requirements of the Applicant Vessel Inspection Procedure. In addition to this all vessels under the control of the Contractor/Subcontractor will be expected to have a SOPEP or equivalent vessel-specific spill plan (i.e. for spills originating from a vessel or as a result of activities carried out by the Contractor/Subcontractor).
33. The Applicant will contractually require the Marine Coordinator to be notified by the Contractor/Subcontractor of any pollution incidents at the Proposed Development, together with any proposed response procedures.

3.6. SPILL RESPONSE CONTRACTOR

34. An oil spill response contractor must be in place before construction commences at the Proposed Development.

35. During the construction phase, the ECoW and the oil spill response contractor will be required to provide response capabilities in accordance with the maximum adverse scenario associated with the Contractor/Subcontractor scope of work.
36. During the operation and maintenance phase, the ECoW and the oil response contractor will provide response capabilities, coordinating as necessary with the Environmental Manager, in relation to the maintenance activities carried out at the Proposed Development.
37. In the unlikely event of a Tier 2/3 spill occurring, the decision on whether to engage a Tier 2/3 contractor will be made by the Applicant in consultation with the Maritime and Coastguard Agency (MCA) and MS-LOT.

3.7. MARITIME AND COASTGUARD AGENCY

38. The MCA is designated as the UK Competent Authority for counter pollution response at the national level and is the custodian of the National Contingency Plan (NCP) which includes arrangements for dealing with pollution, or the threat of pollution, from shipping and offshore installations. The national regime lays down no rigid criteria for NCP activation however it is considered very unlikely that the NCP will be activated for spills originating from activities related to the Proposed Development due to the relatively low risk of spills from offshore wind farm activities.

4. POTENTIAL SPILL SOURCES AND CONTROL MEASURES

4.1. POTENTIAL SPILL SOURCES AND CONTROL MEASURES

39. Construction and operation and maintenance works will be undertaken in such a manner as to minimise the risk of spills and accidental pollution events.
40. Spills are considered most likely to occur during transfer of hydrocarbons and chemicals offshore (e.g. during refuelling operations, or in the event of a leak within equipment within the Proposed Development). However, due to measures adopted such as operating procedures, toolbox talks and experience working in the marine environment, the majority of spills associated with the Proposed Development are considered likely to be small (Tier 1).
41. The Contractor/Subcontractor MPCP will be requested to include the following information:
 - an inventory of the types of pollutants (particularly hydrocarbons) to be used during the construction and/or operation of the Proposed Development. These should include volumes, type and source for each of the pollutants identified (e.g. hydraulic oils, lubricants etc); and
 - preventative measures relevant to the activities to be undertaken at the Proposed Development.
42. A register of all the vessels involved in construction and operation activities at the Proposed Development shall be developed and updated by the Marine Coordinator. This register will list the types and volumes of hydrocarbons carried on board vessels associated with the Proposed Development.
43. The risk of spillage and pollution will be minimised by using correct procedures during the construction and operation and maintenance phases. Potential spill risks and control measures will be identified using planning tools such as:
 - programme review meetings (involving relevant contractors);

- pre-commencement meetings to review the final work programme(s); and
- preparation of Risk Assessment Method Statements (RAMS) for all operations including hazard and risk identification. This will test the work programme for likelihood and severity of all potential risks and to identify appropriate control measures.

44. Section 4.2 contains information regarding pollution sources and risk assessment, together with proposed control measures.

4.2. POLLUTION SOURCES AND RISK ASSESSMENT

4.2.1. TIER CLASSIFICATION

45. Potential spill scenarios will be dictated by the chemical inventories (including hydrocarbons) associated with activities associated with the Proposed Development.
46. Levels of response for oil spill are generally divided into three tiers, depending on the severity of the spill, the resources required to deal with the spill, and the potential impact on environmental and human receptors. Applying a tiered approach ensures the appropriate resource can be made available for potential pollution incidents. These tiers are commonly described as follows and are illustrated in Figure 4.1:
 - tier 1 response is that which is immediately available on site, geared for the most likely and low risk spill. Generally, Tier 1 responses will be managed by the Contractor/Subcontractor;
 - tier 2 response is for less frequently anticipated spills of larger size and for which external resources at a regional level will be required to assist in monitoring and clean-up; and
 - tier 3 response is in place for the very rarely anticipated spill of major proportions and which will possibly require national and international resources to assist in protecting vulnerable areas and in the clean-up.

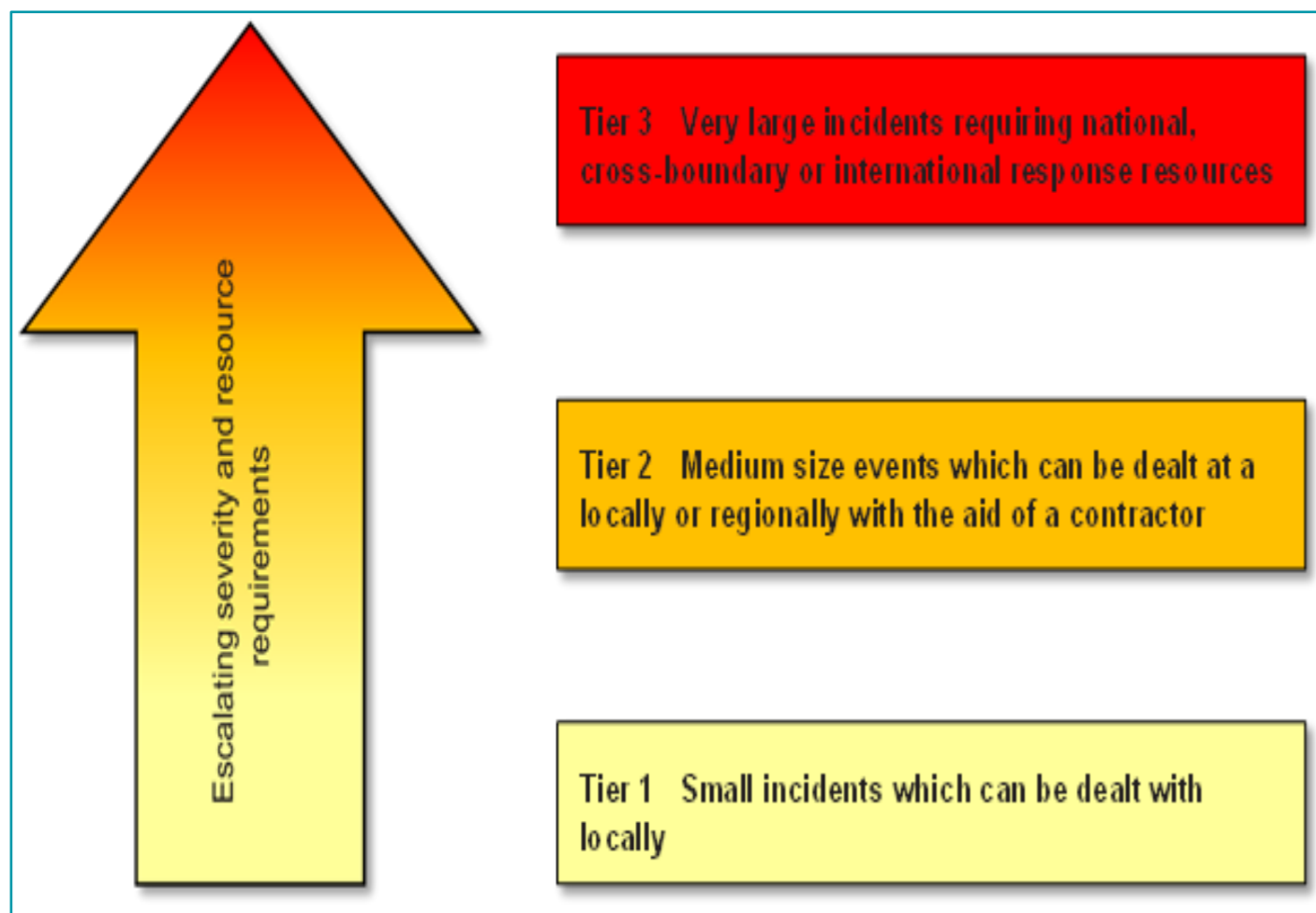


Figure 4.1: Tier Definition (based on MMO, 2020)

47. Tier 3 scenario usually covers an exceptionally large volume of spilled oil, usually a rare but highly significant event, such as an oil well blowout or major spill from a ship. However, a Tier 3 response may also be required for smaller spills which would usually fall under Tier 2, but if located in highly sensitive areas (e.g. near to designated sites with features vulnerable to the impact of accidental pollution), or when highly specialised strategies to deal with the spill may be needed and are not available locally.

4.2.2. PROPOSED DEVELOPMENT POTENTIAL SPILL SCENARIOS AND CONTROL MEASURES

48. Table 4.1 describes the potential spill scenarios and control measures identified for the Proposed Development. This table will be refined prior to commencement of construction and adapted accordingly for the relevant Contractor MPCP and as much is subject to change once further detail is available. Furthermore, the risk assessment will be reviewed and updated annually or after significant legislative or procedural changes as necessary after completion of the construction phase to verify its relevance before the operation and maintenance phase of the Proposed Development commences.

49. The main source of hydrocarbons associated with the Proposed Development will include the following:
- wind turbines: synthetic oil, hydraulic oil, gear oil and diesel fuel; and
 - OSPs/Offshore convertor station platforms: diesel fuel, transformer coolant oil, HVAC coolant.
50. The volumes of these will be limited to the bunkering capabilities of the vessels. The realistic maximum adverse scenario would be a complete loss of fuel inventory from two large vessels (either as a result of a two vessel collision or a vessel to wind farm collision).

Table 4.1: Potential Spill Scenarios and Control Measures for the Proposed Development

Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
Hydrocarbons Marine Gas Oil (MGO) and/or Intermediate Fuel Oil (IFO)	Vessel Refuelling	Refuelling at sea will be undertaken by Contractors as required, particularly for vessels restricted to leave station to take on fuel, such as jack ups.	Low	Tier 2
	Loss of fuel during vessel to vessel refuelling at sea or refuelling at port. Equipment Refuelling Loss of fuel during refuelling of equipment (on vessel or on wind turbine/OSP-Offshore convertor station platforms).	Preparation and review of task specific risk assessments, method statements and fuel transfer planning tools and checklists. All refuelling operations will be planned in advance. As far as practicable, any offshore refuelling should only commence during daylight and in good weather conditions. Refuelling operations will be carried out under the supervision of an appointed responsible person on board (e.g. Chief Engineer) and in accordance with each vessel's stipulated procedure and checklist. A bunker plan shall be developed and posted on the Bridge and in the Machinery Control Room. A meeting will be held with the ship staff involved in fuel transfer before the operation commences, and the following will be discussed, as a minimum: <ul style="list-style-type: none"> • bunker plan, including any anticipating changes; • risk assessment; • individual roles and responsibilities in the process; • emergency situations; and • bunkering checklists. Only hoses fitted with non-return valves shall be used for the offshore transfer of fuel or other fluids. All personnel should comply with all relevant legislation, permits and guidance relating to the environment they are working in and the activity they are engaged in. For this, appropriate training of personnel shall be provided (including in spill prevention awareness and in the use of spill kits) and supervision of activity will be carried out. During fuel transfer operations, a visual lookout will be made to verify hose integrity at all times during the transfer and to spot any leaks immediately. All storage tanks and/or areas shall be banded to at least 110% of the total oil storage inventory volume. Spill kits shall be readily available for clearing any minor spills. Regular inspection and maintenance of equipment will be carried out during operations. There are several means of preventing any fuel oil from escaping into the bilges such as trays beneath oil pumps, heaters etc. special oil gutter ways etc. These should be regularly inspected and drained or cleaned. Oil pressure pipes and fuel oil pipes and fittings will be inspected regularly to ensure that leaks are detected at an early stage and rectified.	Low	Tier 1

Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
	Vessel to Vessel Collision	In order to prevent vessel to vessel collisions and vessel to structure allisions, all vessels involved in the Proposed Development shall comply with project specific navigational requirements agreed in advance of the construction phase and shared with all Contractors working onsite. Marine coordination measures set out prior to commencement of activities on site will also be followed by vessels and marine coordinators to prevent collisions.	Very Low	Tier 2
	Loss of fuel from collision between two vessels.			
	Vessel to Structure Allision		Very Low	Tier 2
	Loss of fuel from allision between vessel and structure (e.g. wind turbine).			
	Vessel Stranding/Grounding	In order to prevent vessel stranding/grounding, all vessels involved in the Proposed Development will comply with project specific navigational requirements agreed in advance of the construction phase and shared with all Contractors working onsite.	Very Low	Tier 2
	Loss of fuel due to vessel stranding/grounding.			
	Failure of Plant or Equipment	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1
	Release of fuel due to failure of plant or equipment.	All plant and equipment shall only be operated by adequately trained and competent personnel.		
		All storage tanks and/or areas shall be banded to at least 110% of the total oil storage inventory volume.		
		The means of preventing any fuel oil from escaping into the bilges will be regularly inspected and drained or cleaned.		
	Spillage During Use of Equipment	Oil pressure pipes and fuel oil pipes and fittings will be inspected regularly to ensure that leaks are detected at an early stage and rectified.	Low	Tier 1
	Small spills during equipment operation.	Preparation and review of task specific risk assessments and method statements.		
		Appropriate training of personnel shall be provided (including in spill prevention awareness and in the use of spill kits). Spill kits shall be readily available for clearing any minor spills. The means of preventing any fuel oil from escaping into the bilges will be regularly inspected and drained or cleaned.		
Lubricating Oil	Incident	Oil pressure pipes and fuel oil pipes and fittings will be inspected regularly to detect any leaks and rectified them at an early stage.	Very Low	Tier 2
	Loss of lubricating oil from collision between two vessels, or allision between vessel and structure, or stranding/grounding of vessel.	In order to prevent vessel to vessel collisions and vessel to structure allisions all vessels involved in the Proposed Development shall comply with project specific navigational requirements agreed in advance of the construction phase and shared with all Contractors working onsite. Marine coordination measures set out prior to commencement of activities on site will also be followed by vessels and marine coordinators to prevent collisions.		
		Leakage within Wind Turbines		
	Leakage of lubricating gear oil or grease within the nacelle.	Typically, the wind turbine nacelle frame is designed and manufactured with a bund incorporated which can hold the full oil content of the gearbox in the event of a catastrophic failure. Turbine sensors will achieve early detection of loss of fluid.	Low	Tier 1
		Furthermore, the nacelle also has a banded area within the nacelle to collect lubricating oil in the unlikely event of a leak.		
		Gear oil seals shall be routinely checked during planned maintenance programmes.		

Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
	Leakage within OSPs/Offshore convertor station platforms	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1
	Leakage of transformers.	Transformer oil seals shall be routinely checked during planned maintenance programmes. Environmental mitigation measures, such as transformer bunding to contain any oil leaks, will be fully operational prior to the OSP/Offshore convertor station platform transportation stage. The OSPs/Offshore convertor station platforms contain a drainage system which collects wastewater as well as connecting bunded areas. This drainage system also incorporates an oil separation unit which separates any contamination from the collected water. The collected water is then re-circulated through the oil separator with clean water being discharged in accordance with restricted limits. Any contaminants which have been separated during this process will be securely contained and stored for transportation to shore and controlled processing and/or disposal.		
	Spillage During Use of Equipment	Preparation and review of task specific risk assessments and method statements.	Low	Tier 1
	Small spills during equipment operation.	Personnel shall be trained in spill prevention awareness, and in the use of spill kits. Spill kits shall be readily available for clearing any minor spills. Fittings will be inspected regularly to detect any leaks and rectified them at an early stage.		
	Failure of Plant or Equipment	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1
	Release of lubricating oil due to failure of plant or equipment.	All plant and equipment shall only be operated by adequately trained and competent personnel.		
Hydraulic Oil	Incident	In order to prevent vessel to vessel collisions and vessel to structure collisions all vessels involved in the Proposed Development shall comply with project specific navigational requirements agreed in advance of the construction phase and shared with all Contractors working onsite. Marine coordination measures set out prior to commencement of activities on site will also be followed by vessels and marine coordinators to prevent collisions.	Very Low	Tier 1
	Loss of hydraulic oil from collision between two vessels, or collision between vessel and structure, or stranding/grounding vessel.			
	Leakage within Wind Turbines	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1
		Turbine sensors will enable early detection of loss of fluid and leaks. Furthermore, lubricating oil will be collected in a bunded area within the nacelle in the unlikely event of a leak. Oil seals shall be routinely checked during planned maintenance programmes.		
	Failure of Plant or Equipment	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1
	Release of hydraulic fluid oil due to failure of plant or equipment (e.g. hydraulic hoses).	All plant and equipment shall only be operated by adequately trained and competent personnel. All storage tanks and/or areas shall be bunded to at least 110% of the total oil storage inventory volume.		
	Spillage During Use of Equipment	Preparation and review of task specific risk assessments and method statements. Personnel shall be trained in spill prevention awareness, and in the use of spill kits.	Low	Tier 1
	Small spills during operation.	Spill kits shall be readily available for clearing any minor spills. Fittings will be inspected regularly to detect any leaks and rectified them at an early stage.		
Chemicals	Incident	In order to prevent vessel to vessel collisions and vessel to structure collisions all vessels involved in the Proposed Development shall comply with project specific navigational requirements agreed in advance of the construction phase and shared with all Contractors working onsite. Marine coordination measures set out prior to commencement of activities on site will also be followed by vessels and marine coordinators to prevent collisions.	Very Low	Tier 1

Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
	Loss of chemical load from vessel collision/allision, or stranding/grounding vessel.			
	Leakage within Wind Turbines	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1
	Leakage of coolant or transformer fluid within nacelle.	Turbine sensors will enable early detection of loss of fluid and leaks. Furthermore, lubricating oil will be collected in a bunded area within the nacelle in the unlikely event of a leak. Equipment including hoses, pipes and seals shall be routinely checked during planned maintenance programmes.		
	Spillage During Use	Chemicals will, where relevant, be selected, stored and managed in accordance with the relevant regulations and legislation Preparation and review of task specific risk assessments and method statements.	Low	Tier 1
	Spillage of paints, paint thinners, solvents, cleaning fluids, etc. during use.	Personnel shall be trained in the correct handling and use of chemicals and in spill prevention awareness (including the use of spill kits). Spill kits shall be readily available for clearing any minor spills. All hazardous substances shall have a Safety Data Sheet (SDS), which includes procedures for handling/working with said substance in a safe manner. Thus, any handling/use of chemicals and hazardous substances shall be in compliance with the information on the SDS. Control of Substances Hazardous to Health (COSHH) assessments should be conducted for development specific hazardous substances. Segregated storage facilities will be used to control the separation of hazardous substances. Chemicals will, where relevant, be selected, stored and managed in accordance with relevant regulations and legislation.		

5. RESPONSE PROCEDURES AND CHECKLISTS

5.1. POLLUTION INCIDENT RESPONSE PROCEDURE

5.1.1. INTRODUCTION

51. Any spill (actual or likely) into the marine environment, irrelevant of its size and whether it arises from the activities at the Proposed Development or not, must be reported, following the procedures set out in sections 5.1.2 to 5.1.4, whilst a Contractor or Subcontractor is working on the Proposed Development.
52. In the event of a spill, priority should be given to taking measures to ensure the safety of personnel, offshore installations and vessels, and to prevent escalation of the spill.
53. Should the spillage be part of a wider emergency, such as fire or explosion, reference should also be made to the ERCoP, which will be produced post consent.

5.1.2. SPILLS ORIGINATING FROM A VESSEL – RESPONSE AND NOTIFICATION OVERVIEW

54. In the event of a marine pollution incident (hydrocarbon or chemical), where the spill originates from a vessel or a vessel related activity, during construction or operation and maintenance at the Proposed Development, the steps described below should be followed:
 - report the spill to the Vessel Master as soon as it is observed;
 - the Contractor/Subcontractor Vessel Master will report the spill as soon as it is safe to do so, to Aberdeen Coastguard Operations Centre (CGOC) via phone, and then to the Marine Coordinator via phone. Verbal communication should be followed up when practicable with the submission by the Contractor/Subcontractor Vessel Master of a Marine Pollution Report (POLREP) via email (or fax) to the CGOC and the Marine Coordinator, who in turn will notify the Applicant personnel (see volume 4, appendix 22); and
 - the Contractor/Subcontractor responsible for the vessel from which the spill has originated will engage the vessel SOPEP and assume primacy for the incident ensuring ongoing reporting on spill status, as necessary, and initiating response or clean-up operations as required. The relevant Contractor/Subcontractor, as the primary responder, will request support from a specialist spill response contractor as required. The Marine Coordinator will provide a supporting role and assist with communication throughout an incident.
55. In the very unlikely event that a regional or national (Tier 2 or 3) response is required, the MCA may take charge of the situation and implement the National Contingency Plan (NCP) (MCA, 2014).

5.1.3. SPILLS ORIGINATING FROM AN INSTALLATION ASSOCIATED WITH THE PROPOSED DEVELOPMENT – RESPONSE AND NOTIFICATION OVERVIEW

56. The following steps should be followed when the spill originates from an installation associated with the Proposed Development:
 - report the spill to the Marine Coordinator as soon as it is observed;
 - the Marine Coordinator will report the spill as soon as it is safe to do so, to Aberdeen Coastguard Operations Centre (CGOC) via phone, and then to The Applicant Environmental Manager via phone.

- Verbal communication should be followed up when practicable with the submission by the Marine Coordinator of a Marine POLREP via email (or fax) to the CGOC; and
- the Marine Coordinator will engage the MPCP and assume primacy for the incident. The Marine Coordinator will be responsible for ongoing reporting on spill status and coordinate the initial response with the spill observer who may utilise spill kits on the offshore installation. The primary responder will request support from a specialist spill response contractor as required.

57. The type and volume of hydrocarbons and chemicals on the wind turbines and OSPs/Offshore converter station platforms are not considered to warrant a Tier 2 or Tier 3 response (Table 4.1) due to volume and type of chemical. It is therefore not anticipated that the implementation of an NCP would be required. Nonetheless, the MCA will be kept informed by verbal communications and through ongoing submission of the POLREP.

5.1.4. SPILLS WITHIN A PORT

58. For Port/Harbour spills the Contractor/Subcontractor will contact the relevant Port/Harbour Authority in the first instance and follow all port processes as advised. Each Contractor MPCP will provide details of all ports/harbour authorities of relevance.
59. The Contractor/Subcontractor will provide details in advance of their works, of the main ports/harbour authorities anticipated to be used whilst working on the Proposed Development, therefore contact detail will be updated by the Contractor/Subcontractor. All incidents that occur whether in the Proposed Development working area or not, must be notified to The Applicant Environmental Manager and Marine Coordinator.

5.2. REPORTING REQUIREMENTS

60. There is a requirement for all employees, contractors and subcontractors to report all accidents, incidents and hazards to the Applicant Environmental Manager and Marine Coordinator.
61. Significant or potentially significant incidents (including marine incidents) are required to be immediately reported and escalated through the business management chain within 30 minutes of their occurrence or when safe to do so.
62. In the event of a pollution incident, the Spill Observer shall notify the Applicant Environmental Manager. The Applicant Environmental Manager shall then notify the Vessel master and Marine Coordinator. The Marine Coordinator shall then notify Aberdeen CGOC and the MCA.
63. If the spill originates from a vessel, or from operations taking place on a vessel, the Spill Observer shall report it directly to the Vessel Master. The Vessel Master shall then notify the Applicant Environmental Manager and Marine Coordinator. The Vessel Master shall also notify Aberdeen CGOC and the MCA.

5.2.2. STATUTORY REPORTING REQUIREMENTS

64. There is a statutory requirement to report marine pollution incidents to Marine Scotland (HM Government, 2018) and SEPA for coastal waters (Scottish Government, 2022). There is also a requirement to report any spill incident to the Applicant 24-hour reporting line within 30 minutes of the incident occurring.
65. The flow chart in Figure 5.1 should be followed for all responses.

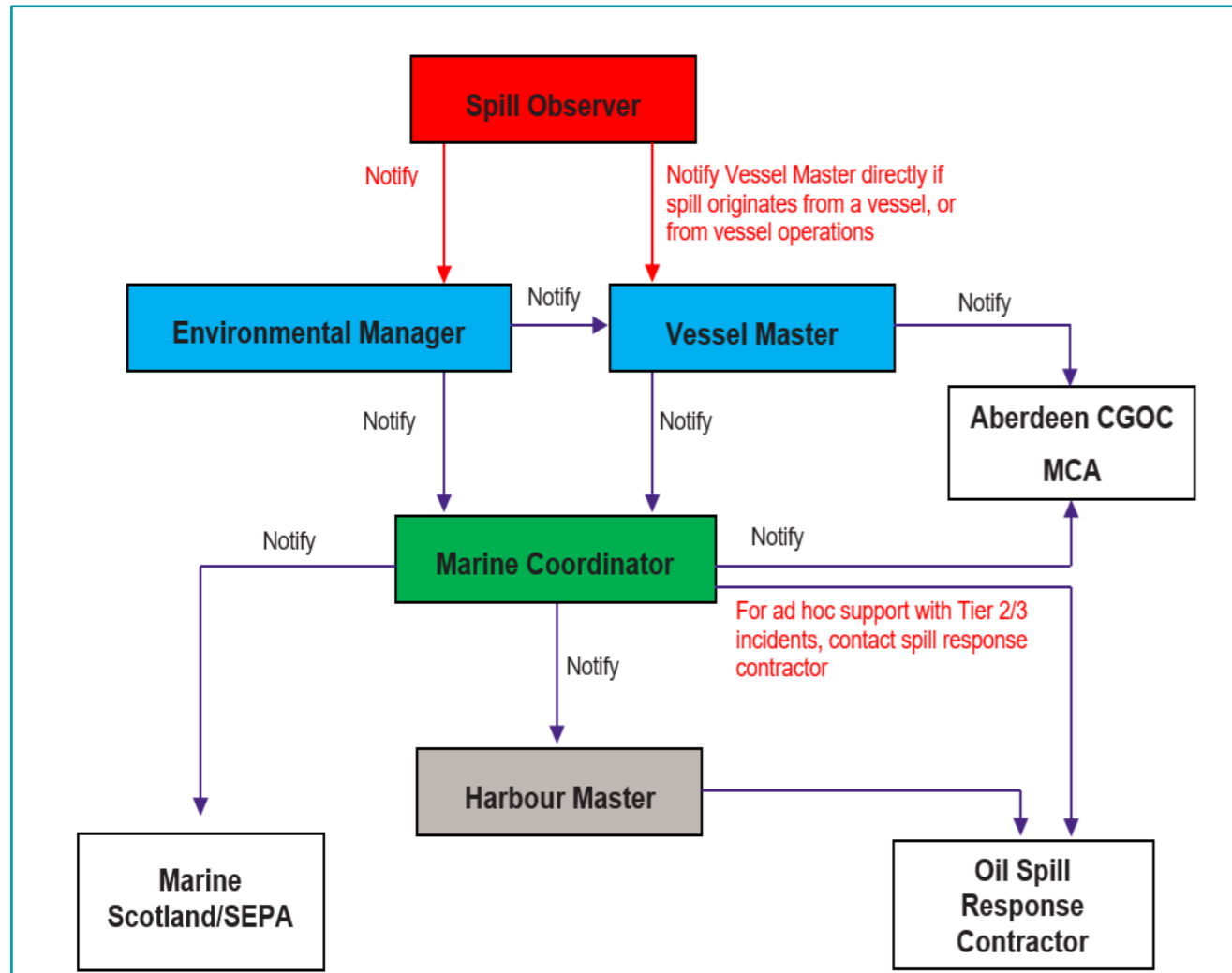


Figure 5.1: Reporting Requirements for any Potential Spills at the Proposed Development

5.2.3. RESPONSE CHECKLISTS

66. Table 5.1 to Table 5.4 provide key actions and notification for key personnel identified in Figure 5.1 with which they would be expected to comply.

Table 5.1: Spill Observer

Actions to be Completed by the First Person who Observes the Spill	
Initial Actions	
Notify the Applicant Environmental Manager or Vessel Master and provide details of:	
<input type="checkbox"/>	<ul style="list-style-type: none"> time; possible source of spill; current spill location; oil/chemical type; estimation of quantity of oil/chemical spilled; and any other relevant details.
<input type="checkbox"/>	Contact all personnel in the vicinity of the spill and warn of the potential hazard.
Ongoing Actions	
<input type="checkbox"/>	If safe to do so, stay in vicinity of the spill and continue observation.
<input type="checkbox"/>	If safe to do so, take any reasonable action to isolate the source of the spill.

Table 5.2: Applicant Environmental Manager or Vessel Master

Actions to be Completed by the Environmental Manager or Vessel Master	
Initial Actions	
<input type="checkbox"/>	Receive report on spill from Spill Observer and take charge of the situation.
<input type="checkbox"/>	If safe to do so, immediately initiate actions to identify/stop the spill source.
Maintain safety of:	
<input type="checkbox"/>	<ul style="list-style-type: none"> personnel; the deployment/vessel; any vessel within 500 m.
<input type="checkbox"/>	Vessel Master to notify Aberdeen CGOC by Very High Frequency (VHF) radio (note that CGOC must be notified regardless of location).
<input type="checkbox"/>	Vessel Master to notify Harbour Master by VHF radio.
<input type="checkbox"/>	Activate the relevant SOPEP or equivalent vessel specific spill plan if the spill originated from a vessel.
<input type="checkbox"/>	Initiate a chronological log of events and actions taken – maintain this log until stand down (use incident log sheet in section).
Ongoing Actions	
<input type="checkbox"/>	Inform the Marine Coordinator of the spill and jointly assess the situation and the required resources to tackle the spill. Classify the spill size with the Marine Coordinator.
<input type="checkbox"/>	Confirm spill source and estimate quantity of oil/chemical spilled. Determine the likely spill movement.
<input type="checkbox"/>	Ensure all other installations and vessels in the vicinity have been informed of the spill if deemed necessary.
<input type="checkbox"/>	If no risk to personnel or installation, request/use vessel to track spill location and take photographs of the spill.
<input type="checkbox"/>	In most cases (i.e. a Tier 1 spill), unless there are compelling reasons to do otherwise, the spill will be monitored and allowed to disperse naturally.
<input type="checkbox"/>	Natural dispersion of spill oil can be encouraged by 'prop-washing' – steaming at speed through the oil slick, creating a wash with the vessels' propeller and wake. This should only be done if appropriate to the scenario and the Vessel Master deems it to be safe.
<input type="checkbox"/>	Assess the ongoing nature of the spill and the possible need to mobilise additional resources. Maintain close contact with the Marine Coordinator in making this assessment. If the spill incident escalates, command and control of the spill will be passed to the Marine Coordinator.
<input type="checkbox"/>	If the spill is an oil spill, samples of the spill to be taken if the incident is a Tier 2/3 incident.
Close out Actions	
<input type="checkbox"/>	At the end of the incident, stand down the response and prepare a report of the incident for the Applicant.

Table 5.3: Marine Coordinator

Actions to be Completed by the Marine Coordinator	
Initial Actions	
<input type="checkbox"/>	On notification of a pollution incident from the Applicant Environmental Manager/Vessel Master, record all details of the incident and all incoming information and conversations, maintaining a chronological log of events (use incident log sheet in section 8).
<input type="checkbox"/>	On receiving notification from the Applicant Environmental Manager or Vessel Master, jointly assess the situation and the required resources to tackle the spill. Classify the spill size with the Applicant Environmental Manager or Vessel Master.
	If the spill is a Tier 1 spill, Contractor will lead the spill response with the Applicant acting to monitor the response to the incident.
	If the spill is a Tier 2 spill, the Applicant will assume control of the incident with support from the relevant Port Authority and/or a spill response contractor.
Ongoing Actions	
<input type="checkbox"/>	If the spill is a Tier 1 incident, monitor the Contractor's response to the incident.
	Report the incident to Marine Scotland via telephone as soon as possible (refer to section 9 for contact details). Give Marine Scotland full information on the location of the incident, time, quantity spilled, movement and current spill status.
<input type="checkbox"/>	Record the time of notification to Marine Scotland.
	Ensure Oil Spill Report (PON1 form) has been submitted to Marine Scotland within 12 hours of the incident occurring.
<input type="checkbox"/>	Ensure the spill is being tracked and determine likely movement (e.g. towards other installations/environmentally sensitive areas/coastal areas).
<input type="checkbox"/>	Work with the Applicant Environmental Manager or Vessel Master to prevent or reduce further spillage without endangering the safety of personnel.
<input type="checkbox"/>	Ensure all other installations and vessels in the vicinity have been informed of the spill if deemed necessary.
<input type="checkbox"/>	Notify other internal and external stakeholders as appropriate, such as the Applicant management, other Regulators, etc.
<input type="checkbox"/>	Ensure that photographs of the spill are taken by the vessel crew. If the spill is an oil spill, ensure that samples of the spill are taken if the incident is a Tier 2/3 incident, if safe to do so.
<input type="checkbox"/>	In cooperation with the Applicant Environmental Manager/Vessel Master, ensure that the spill is monitored until complete dispersion.
	In the event that the proponents' on-site resources are not able to adequately respond to the existing spill, or if the existing spill is likely to escalate (i.e. a Tier 2 spill), request support from the relevant Port Authority and/or a spill response contractor.
<input type="checkbox"/>	Seek advice from the relevant Port Authority or Tier 2 spill response contractor on the following: <ul style="list-style-type: none"> • overall extent and on-going nature of spill; • direction of movement, especially noting other installations and vessels in the vicinity; • proximity to environmentally sensitive areas; and • areas possibly in need of urgent response measures.
<input type="checkbox"/>	Work with the relevant Port Authority/Spill Response Contractor to manage the incident.
<input type="checkbox"/>	Ensure that a daily notification is made to Marine Scotland for the duration of the incident.
Close out Actions	
	In cooperation with the Harbour Master, make an assessment of when to demobilise the response. Commence "stand-down" procedures as follows:
<input type="checkbox"/>	<ul style="list-style-type: none"> • ensure the Marine Scotland are informed of the final state of the spill incident; • ensure all vessels, contractors, local authorities and any external resource suppliers, etc. are contacted, notified of the end of the incident and stood down; and • remain accessible to support personnel in compiling their reports.

Actions to be Completed by the Marine Coordinator	
<input type="checkbox"/>	Collect copies of Incident Logs.
<input type="checkbox"/>	Carry out internal reporting of the incident as necessary. Ensure that a "lessons identified" profile is available quickly so that remedial action and the possible upgrading of procedures can take place.

Table 5.4: Harbour Master

Actions to be Completed by the Harbour Master	
Initial Actions	
<input type="checkbox"/>	On notification from the Marine Coordinator, record all details of the incident and all incoming information.
<input type="checkbox"/>	Notify the MCA/Aberdeen CGOC and other vessels/installations in the vicinity if necessary.
Ongoing Actions	
<input type="checkbox"/>	In the event that the spill is a Tier 1 spill, monitor the response to the incident. Request confirmation from the Operations Manager that the spill is being managed effectively.
<input type="checkbox"/>	In the event that the spill is a Tier 2 spill, provide assistance to the Applicant in managing the response as per the relevant Port Authority Oil Pollution Contingency Plan.
<input type="checkbox"/>	In the event of a Tier 3 incident, assume overall command and control of the incident in cooperation with the MCA as per the relevant Port Authority Oil Pollution Contingency Plan. However, it should be noted that a Tier 3 incident from activities associated with the Proposed Development are considered highly unlikely.
Close out Actions	
	For a Tier 2 response, in consultation with the Operations Manager, make an assessment of when to demobilise the response. Commence "stand-down" procedures as follows:
<input type="checkbox"/>	<ul style="list-style-type: none"> • ensure all vessels, contractors, subcontractors, local authorities and any external resource suppliers, etc. are contacted, notified of the end of the incident and stood down; and • remain accessible to support personnel in compiling their reports.
<input type="checkbox"/>	Ensure that a "lessons identified" profile is available quickly so that remedial action and the possible upgrading of procedures can take place.
<input type="checkbox"/>	Organise an internal 'cold wash' meeting to review and discuss the incident, learning points and the possible upgrading of procedures.

5.3. RESPONSE STRATEGIES

5.3.1. RESPONSE STRATEGIES FOR TIER 1 INCIDENTS

67. The key response strategy for Tier 1 spills will be to allow natural dispersion, together with monitoring and evaluation using a small vessel. This is the best option for Tier 1 spills of water-soluble chemicals, or of light oils such as diesel or hydraulic oil. Natural dispersion can be encouraged using a technique called 'prop-washing'.

5.3.2. RESPONSE STRATEGIES FOR TIER 2/3 INCIDENTS

68. It is expected that any spills associated with the Proposed Development will be Tier 1 spills due to the small inventories of oil/chemicals and the low risk nature of activities to be carried out.
69. In the event of a Tier 2 incident, it is expected Marine Scotland will request assistance from the relevant Port Authority with regards to access to the stockpile of pollution response equipment and the relevant Port Authority as an Oil Spill Response Co-operative known as the Oil Clean Up Committee. Access to this stockpile is by mutual agreement between Marine Scotland and the relevant Port Authority.

70. The decision on whether to engage a Tier 2/3 contractor would likely be made by relevant Port Authority in consultation with Marine Scotland. The relevant Port Authority Tier 2 contractor will be confirmed post consent. They will store and maintain a stockpile of equipment. In the event of a Tier 2 incident the contractor Response will be managed by the relevant Port Authority (in ongoing consultation with Marine Scotland where required).
71. Figure 5.2 details the environmental sensitivities in the vicinity of the Proposed Development that will require consideration during a Tier 1 to 3 spill.

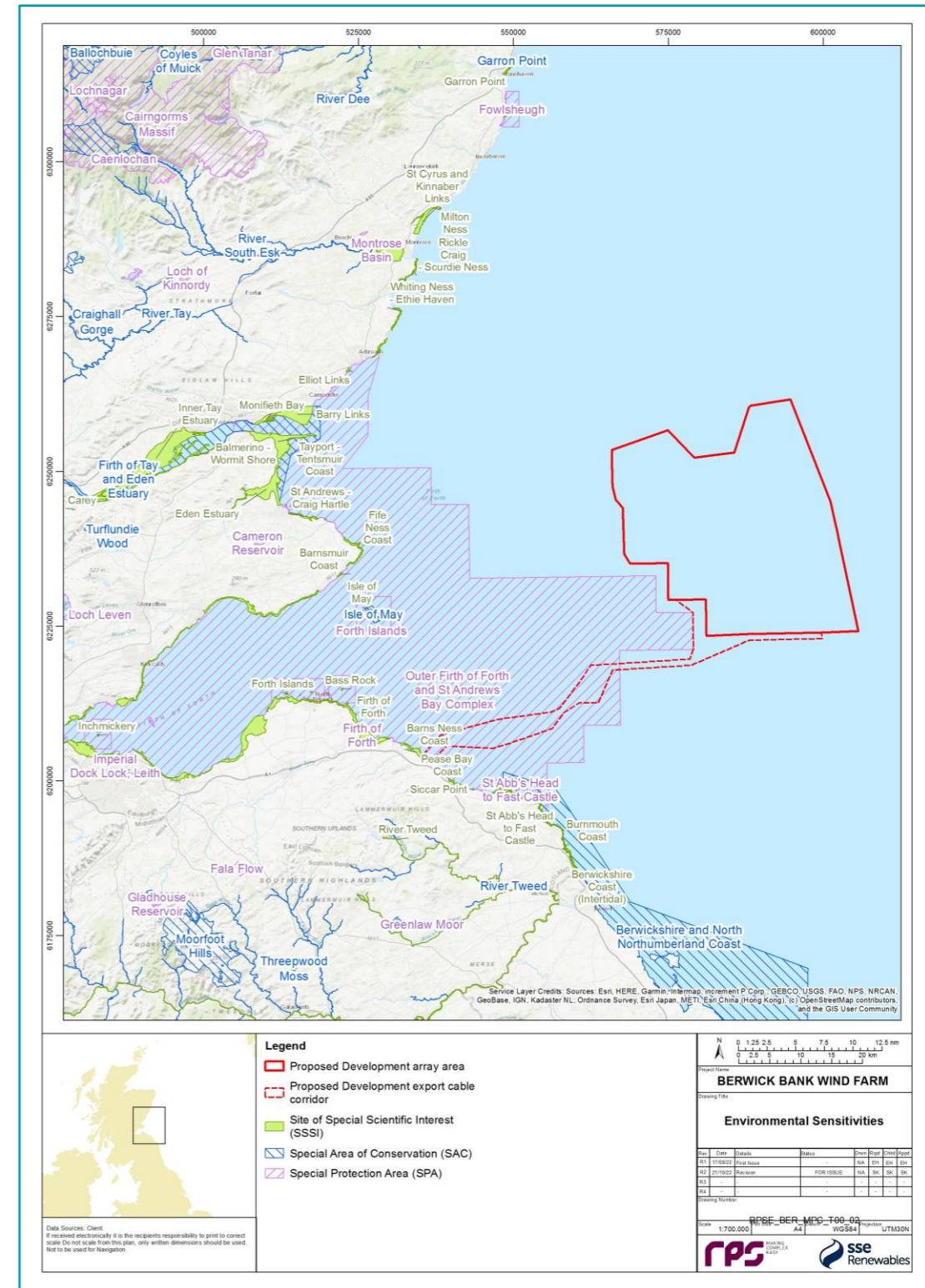


Figure 5.2 Protected Areas in the Vicinity of the Proposed Development

6. SPILL RISK PROFORMA

Spill Risk Proforma – to be completed for each new equipment deployment				
Name of Assessor:				
Date:				
Equipment Type/Brief Description of Equipment:				
Liquid Inventories	Product Name	Product type	Volume (litres)	Location
Reviewed by Operations Manager:				
Date:				
Information Accepted by Marine Scotland?	Yes – mark as approved No – explain to proponent what further information is needed			
Signed off by Operations Manager:				
Name:				
Date:				

7. SPILL ASSESSMENT CHECKLIST

72. To be completed by the Applicant Environmental Manager or Vessel Master.

SPILL ASSESSMENT CHECKLIST	
<p>This checklist is designed to assist those personnel who have the responsibility of assessing a spill incident. These personnel are likely to be:</p> <p style="padding-left: 40px;">Applicant Environmental Manager</p> <p style="padding-left: 40px;">Vessel Master.</p>	
STEP	GUIDANCE
Determine Essential Details	Location of pollution incident; Source of spill; Oil/chemical type; Extent of spill; Time of incident; Potential hazardous circumstances; Any other relevant information (particularly: is spill contained or ongoing?).
Assess Safety Hazards	Until otherwise established, assume an oil spill is giving off potentially dangerous volatile organic compounds (VOCs) (i.e. hydrocarbon vapours). ELIMINATE IGNITION SOURCES Approach spill from upwind to reduce effects of vapours. APPROACH ONLY IF SAFE TO DO SO!
Determine Spill Source	If source unknown, investigate with care. Instigate actions to stop spillage at source. IF SAFE TO DO SO!
Estimate Quantity	Estimate quantity of release if exact amount unknown.
Determine movement	Determine direction and speed of spill movement based upon the prevailing wind and sea conditions.
Assess prevailing and if possible future weather conditions	Determine: <p style="padding-left: 40px;">Wind speed and direction;</p> <p style="padding-left: 40px;">State of tide;</p> <p style="padding-left: 40px;">Current speed and direction; and</p> <p style="padding-left: 40px;">Sea state.</p>



Organisation	Contact	Telephone (office hours)	24 hr. Telephone	Mobile/Pager/Email
Emergency Services				
Ambulance				
Fire				
Police				
Local Authorities				
Other Contacts (for information, advice or appointment of ad-hoc spill response contractor)				

10. REFERENCES

HM Government (2018). *Guidance - How to respond to marine pollution incidents*. Available at: [How we respond to marine pollution incidents - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/681222/How-we-respond-to-marine-pollution-incident-guidance.pdf). Accessed on: 16 August 2022.

MCA (2014). *The National Contingency Plan. A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations*. Available at: [National Contingency Plan \(NCP\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/281222/National-Contingency-Plan-NCP.pdf). Accessed on: 23 May 2022.

MMO (2020). *Marine Pollution Contingency Plan*. Available at: [Marine Pollution Contingency plan.pdf \(publishing.service.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/881222/Marine-Pollution-Contingency-Plan.pdf). Accessed on: 10 August 2022.

Scottish Government (2022). *Policy – Pollution*. Available at: [Pollution - gov.scot \(www.gov.scot\)](https://www.gov.scot/policies/pollution). Accessed on: 16 August 2022.

