



# Eastern Green Link 3

## Appendix 3B: Outline Construction Environmental Management Plan

Prepared for: Scottish Hydro Electric Transmission plc (SHE-T)



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## Abbreviations/Glossary

CEMP	Construction Environmental Management Plan
CFE	Controlled Flow Excavator
CLV	Cable Lay Vessel
CoCP	Code of Construction Practice
DPR	Daily Progress Report
EGL	Eastern Green Link
EPC	Engineer, Procure and Construct
HDD	Horizontal Directional Drilling
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
ICPC	International Cable Protection Committee
LAT	Lowest Astronomical Tide
MARPOL	International Convention for the Prevention of Pollution from Ships
MBES	Multi-Beam Echo Sounder
MD-LOT	Marine Directorate - Licensing Operations Team
MEAp	Marine Environmental Appraisal
MHWS	Mean High Water Springs
MINNS	Marine Invasive Non-Native Species
ML	Marine Licence
MLWS	Marine Low Water Springs
MPCP	Marine Pollution Contingency Plan
NCR	Non-Compliance Report
NM	Nautical Mile
OOS	Out-Of-Service
PLGR	Pre-Lay Grapnel Run
RACI	Responsible, Accountable, Consulted, Informed
RAMS	Risk Assessments and Method Statements
RLB	Red Line Boundary
ROV	Remotely Operated Vehicle
SBP	Sub-Bottom Profiler
SHE-T	Scottish Hydro Electric Transmission plc
SOLAS	Safety Of Lives At Sea
SOPEP	Shipboard Oil Pollution Emergency Plan
SSS	Side Scan Sonar
UXO	Unexploded Ordnance





## 1. Introduction

### 1.1. Document Purpose

The document describes the Outline Construction Environmental Management Plan (CEMP) for use in Scottish waters during all Eastern Green Link 3 (EGL 3) construction phases. This Outline CEMP provides the principles to be followed for all construction activities. It is proposed that a separate CEMP be provided for the installation of the ducts at the landfall using horizontal directional drilling (HDD) to allow these enabling works to commence ahead of full construction. The HDD CEMP will follow the principles set out within this document.

EGL 3 comprises approximately 700 km of subsea and underground High Voltage Direct Current (HVDC) cables between new converter stations at each end of the electricity transmission link. These in turn are connected to the existing National Electricity Transmission System (NETS) via High Voltage Alternating Current (HVAC) cables between the new converter stations and new substations. For the purposes of seeking the necessary consents, EGL 3 has been split into different 'Schemes' i.e. English Onshore Scheme, English Offshore Scheme, Scottish Onshore Scheme and Scottish Offshore Scheme (with the latter being referred to hereafter as "the Proposed Development"). Collectively all components are referred to as "the Project". Contractors engaged in the construction of the Proposed Development will be required to comply with the requirements of this Outline CEMP in full. Their own environmental management plans must reflect the objective and requirements set out in this document.

There are potential environmental effects associated with an offshore development which need to be identified and considered before construction takes place. This Outline CEMP is provided as part of the Marine Licence application to demonstrate how commitments made with regards to environmental management are secured and will be taken forward for construction.

The purpose of this Outline CEMP is to set out the framework and principles for the CEMP produced for the construction phase of the Proposed Development. It may be updated accordingly to cover the operational phase of the Proposed Development. This Outline CEMP includes the controls that are proposed to manage the environmental risks associated with construction.

Where contractors are engaged to undertake construction across both the English and Scottish sections of EGL3, they should refer to and comply with the requirements of this CEMP and other CEMPs relevant to the English Offshore Scheme as appropriate.

The scope of this Outline CEMP applies only to works associated with the Scottish Offshore Scheme below Mean High Water Springs (MHWS) and will be finalised prior to construction, setting out the controls and processes that are to be adopted to mitigate the offshore environmental impacts of the Proposed Development. It will also document the environmental measures set out to comply with consent conditions in the Marine Licence.

A series of contractors will be responsible for the detailed design, construction and installation of the main infrastructure associated with the Proposed Development and they must comply with the requirements set out within the final CEMP.

The final CEMP will be produced by the Principal Contractor, to discharge the relevant Marine Licence conditions and to communicate the environmental requirements and standards that must be incorporated into their sub-contractors' Environmental Management Plans and Risk Assessments and Method Statements (RAMS). Contractors' own management plans such as their Shipboard Oil Pollution Emergency Plan (SOPEP) will ensure compliance with the Prevention of Pollution at Sea (MARPOL) and Safety of Life at Sea (SOLAS) conventions and must comply with the principles outlined in this CEMP. All contractors (including sub-contractors) involved in the Proposed Development shall comply with the CEMP in undertaking all works. The contractors' (including sub-contractors') management plans must be based on and comply with the requirements of the Outline CEMP and will be provided for approval in accordance with Marine Licence requirements.

Arrangements and documentation for the management of impacts to Marine Mammals during construction (Marine Mammal Mitigation Plan) will form a separate but related management plan with which contractors will be required to comply.

#### 1.1.1. Scope and Objectives

The CEMP is a tool to set out the Applicant's commitment and approach to environmental management. It will ensure that the licensing authority (and its advisers), as well as the licence holder and all and any contractors (including sub-contractors) engaged during the pre-construction and construction phase of the Proposed Development, are advised of the responsibilities for licences, consents discharge and environmental protection as well as the manner in which consents will be discharged.

The overarching objectives of the CEMP are:

- to ensure pre-construction and construction activities are undertaken in an environmentally responsible manner; and
- to provide the overarching framework for environmental management, highlighting the hierarchy of documentation that will be used to manage environmental impacts during the offshore construction works.
- to provide construction contractors with concise, clear and practical details of the environmental management measures and licence obligations that will be implemented and with which they must comply.
- to ensure consistency in approach and performance of environmental management of contractors during the offshore construction works.



## 1.2. Structure of the Final CEMP

The final CEMP will include the following information:

- **Section 1**
  - Overview of the project and scope of works;
  - Overview of project activities to which the CEMP applies;
- **Section 2**
  - Details of the relevant regulations, guidance, applicable licences and permissions;
  - Communication and stakeholder management;
  - Details of the relevant Marine Licence conditions and the mitigation that is required to comply with the licences and permissions;
  - Details of the various plans and documents that interface with the CEMP and how they interface;
  - Environmental management framework;
  - Environmental objectives and targets;
- **Section 3**
  - Roles and responsibilities;
- **Section 4**
  - Environment aspects and impacts;
  - Hazard Identification and risk management;
  - Documentation and records management;
  - Arrangements and documentation for marine pollution contingency planning (Marine Pollution Contingency Plan);
  - Approach to waste management;
  - Arrangements for chemicals risk assessment, management (including HDD fluid breakout plan where required) and provisions for the Control of Substances Hazardous to Health (COSHH) (Chemical Risk Assessment);
  - Dropped objects protocol;
- **Section 5**
  - Approach to Vessel Management and inspection, including fuel storage;
  - Arrangements for compliance monitoring and auditing;
  - Training and awareness; and
  - Approach to complaints, incident management and emergency response.

Table 1-1 displays how the final CEMP will be structured:

Table 1-1: Final CEMP structure

Section	Description
Section 1 & 2	Provides an overview of the Proposed Development. Sets out the purpose and scope of the CEMP, details environmental management framework, including document hierarchy and the process for making updates and amendments.
Section 3	Describes the roles and responsibilities of the various parties
Section 4	Sets out the measures to be implemented for the management of environmental aspects and compliance obligations, including specific issues including (but not limited to) marine pollution, waste, dropped objects and management of marine mammals.
Section 5	Describes the processes to be followed to establish effective communication and reporting, including holding toolbox talks, recording environmental impacts and environmental auditing and training.

Subsequent updates, following the initial approval of the final CEMP by Marine Directorate – Licensing Operations Team (MD-LOT) as part of the discharge of the relevant Marine Licence condition(s), will be provided by the Principal Contractor to MD-LOT for information and to ensure that they hold an up-to-date copy.



## 1.3. Project Overview

### 1.3.1. Project Description

EGL 3 comprises a 2-gigawatt (GW) HVDC link between Aberdeenshire in Scotland, and King's Lynn and West Norfolk, Norfolk with a landfall on the Lincolnshire coast, England. EGL 3 comprises 700 km of subsea and underground HVDC cables between new converter stations at each end of the electricity transmission link. A Development Consent Order under the Planning Act 2008 is being sought for the English Offshore Scheme. A Marine Licence is being sought for the development within Scottish Waters. The Scottish Ministers have devolved powers to grant the Marine Licence under the Marine (Scotland) Act 2010 within territorial waters (up to 12 nautical miles (NM)) and under the Marine and Coastal Access Act 2009 in the Scottish offshore region, beyond 12 NM.

The Proposed Development comprises of the Red Line Boundary (RLB) which delineates a corridor which is nominally 700m wide. This width is considered adequate to micro-site around sensitive seabed features or habitat, or to allow for the footprint of installation vessels and is the maximum extent of seabed in which construction and operation of the Proposed Development may take place. The final cable route will lie within the extent of the RLB. The RLB is shown in **Figure 1-1 (Document reference C01494-EGL3-MEA-LOC-001-A)**.

The construction programme is expected to take approximately 55 months from start to finish of the end to end Project. The Proposed Development is envisaged to commence on-site construction at the earliest in 2028 with the latest possible completion by 2033.

The exact timing of the subsea cable installation works would be dependent upon the date of the contract award for the works, consenting timeframes, time required for detailed design and cable manufacture, availability of cable installation and other vessels and any restrictions to mitigate potential effects on features of conservation interest, fisheries or other sensitive receptors. **Table 1-2** presents the main activities to be undertaken and provides an indicative schedule for each activity.



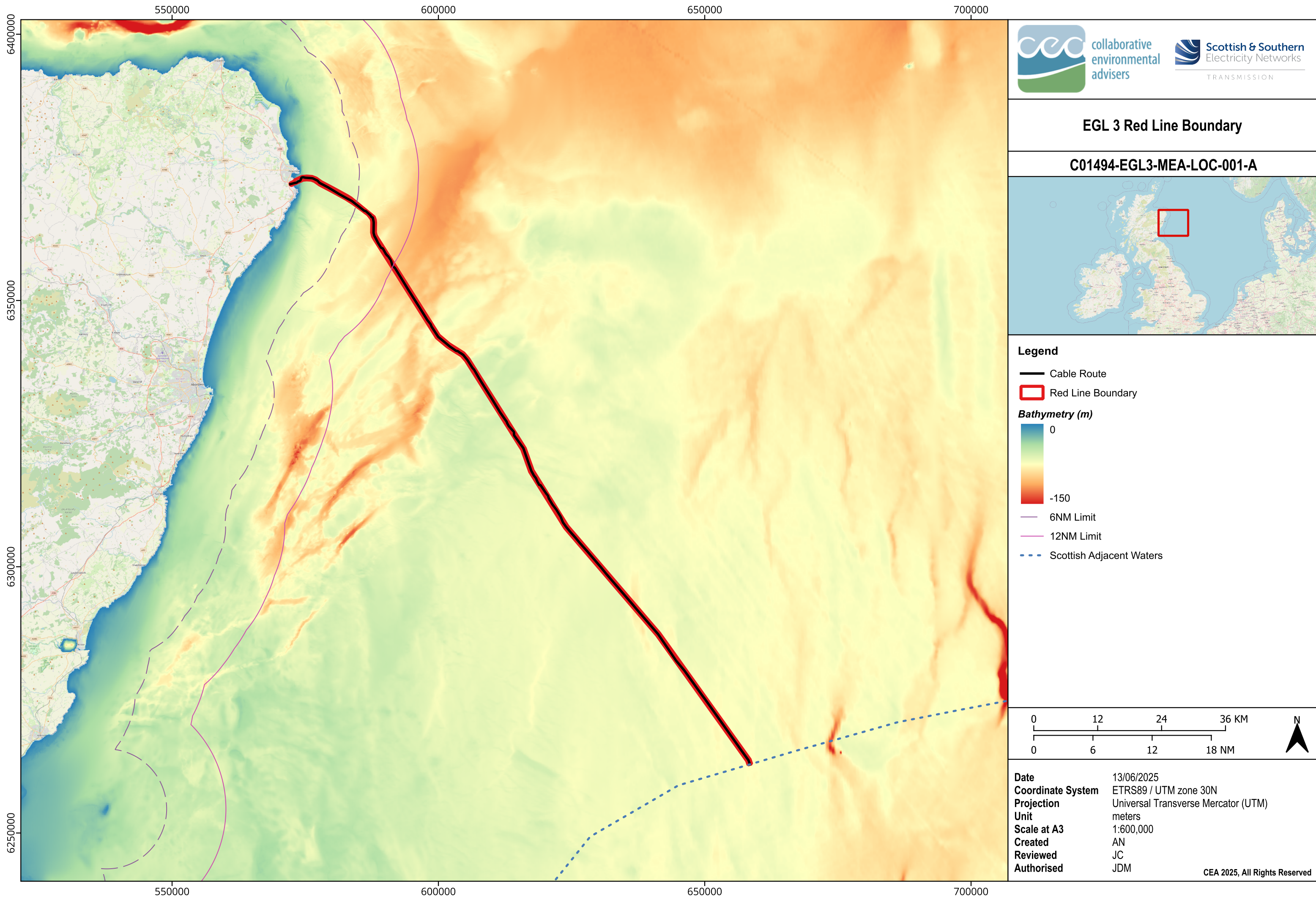






Table 1-2: Scope and indicative schedule for marine works

Activity	Description	Indicative Schedule:
<b>Onshore Construction</b>		
Site set-up	A temporary construction compound and laydown area would be set up at the Sandford Bay landfall location. This compound will store all materials necessary for the works, including plant, waste, cable ducts, cable drums and accessories. In addition to storage, compounds also provide a location for site offices and welfare facilities for construction operatives. These works would be above MHWS but are required to enable the landfall HDD. This will be covered in more detail in the Outline Code of Construction Practice (Outline CoCP)	Following consent award (subject to discharge of Marine Licence conditions)
Horizontal Directional Drilling and Duct Installation	<p>Three cable ducts are to be created using a trenchless solution such as HDD. The purpose of the HDD is to create a bore from above MHWS to below Mean Low Water Springs (MLWS), through which a High-Density Polyethylene (HDPE) or steel conduit/duct containing the fibre optic cable and the HVDC cable can be passed. The cable ducts would exit in the nearshore (between 8 m and 20 m Lowest Astronomical Tide (LAT)).</p> <p>The HDD would start on land and be directed out to sea.</p> <p>Offshore support will likely be required as the duct is installed in the bore.</p> <p>The primary HDD activity that interacts with the marine environment is when the HDD breaks through the sediment (or punches out) onto the seabed.</p> <p>As part of the HDD activities there will be a drilling fluid recirculation and management system. This management system will closely monitor the drilling fluid to minimise any impacts associated with frac outs.</p>	Following consent award (subject to discharge of Marine Licence conditions)
<b>Seabed Preparation</b>		
Pre-lay survey	A pre-lay geophysical survey would be undertaken which may use the following techniques: Swathe and Multibeam Echo Sounder (MBES), Side Scan Sonar (SSS), Sub Bottom Profiler (SBP) and Magnetometer.	2028 - 2031
Unexploded ordinance (UXO) target investigation	A Remotely Operated Vehicle (ROV) or diver survey would be undertaken to investigate any potential UXO targets identified. This may involve small excavations around the potential UXO to confirm its identity. Note these works may be consented via separate marine licence.	2028
Pre-lay grapnel run (PLGR)	<p>The PLGR would be undertaken to clear any debris from the seabed. The PLGR may therefore be undertaken in one single phase prior to the first installation campaign or in separate phases prior to each installation campaign to ensure the route is clear of debris.</p> <p>A multi-cat or towing vessel will pull a grapnel train consisting of a series of different sized grapnels. The typical grapnel will penetrate the seabed to a depth of 0.1 m to 0.3 m depending on the soil conditions and the grapnel configuration.</p>	2029 - 2031



Activity	Description	Indicative Schedule:
Crossing of third-party infrastructure, preparation	<p>Out of Service (OOS) cables that are crossed by the Proposed Development may hamper cable installation. At the location of known OOS cables, a de-trenching grapnel would be deployed to retrieve the OOS cable from the seabed. The section of the OOS cable blocking the subsea cable route would be cut away and removed, after having obtained approval from the owner.</p> <p>The length of cable to be removed would be agreed with the asset owner in advance, but typically a section 100 m long, 50 m either side of the centre line, would be removed. For the purposes of assessment, it has been assumed that a maximum of 200 m of OOS cable would be removed.</p> <p>The ends of the OOS cables would be secured to the seabed in accordance with International Cable Protection Committee (ICPC) Recommendation No. 1 i.e., with flat (or low profile) clump weights which reduces the risk of hooking behind the cable ends by, for instance, fishing gear. Clump weights may be buried in line with agreed mitigation.</p> <p>The clearance of OOS cables would be undertaken by a construction support vessel during the seabed clearance campaign.</p> <p>Where cables and pipelines are still in operation or cannot be removed, crossings will need to be made. These typically involve placing a protective material over the third-party asset, which would be placed at the same time as other route preparation activities. Once the cable has been laid over the protective material, a secondary layer of rock or matting would be laid over the cables to protect them.</p>	2029 - 2031
Sandwave removal	<p>There are areas of mega ripples (wave heights &lt;1.5 m) and sandwaves (wave heights &gt; 1.5 m) present within the RLB.</p> <p>Prior to the installation of the subsea cables pre-sweeping (up to 20 m width swathe) may be required to reduce the height of seabed undulations or sandwaves along the cable route. Pre-sweeping would be used to create a level seabed for the installation equipment to move along. This would improve the chances for the cables to achieve the target burial depth within the Non-Mobile Reference Level (which is depth below which the seabed is considered stable and not subject to significant movement due to factors like sand wave migration or erosion) and to be maintained during the operational lifecycle.</p> <p>Pre-sweeping would be undertaken by either a controlled flow excavator (CFE) or plough.</p>	2029 - 2031
<b>Offshore Construction</b>		
Cable pull-in and cable lay and Burial	<p>Following the completion of preparation activities, the cable would be ready to be laid. The cable lay vessel (CLV) would stand off a short distance from the HDD exit point. A winch rope would be floated out to the CLV from the HDD exit point. The rope would be attached to the cable and winched back in pulling the cable behind. Floats would be attached to the cable. When the cable reaches the HDD exit point, divers would start to remove the floats allowing the cable to enter the HDD.</p>	2029 - 2033



Activity	Description	Indicative Schedule:
	<p>The cable pull would continue until the cable enters the transition joint bay at the HDD entrance. Once the cable is in position, the remaining floats would be removed and the cable would be allowed to sink to the seabed, monitored by divers.</p> <p>Once the cables have been pulled through to shore, the CLV would proceed to move away from the landfall along the cable route laying and, if it is a simultaneous lay and burial operation burying the cable to the required depth of lowering. Should post lay burial be the chosen method, once the CLV has laid the cable on the seabed, a subsequent vessel would then join the operation to bury the cable.</p> <p>Small support vessels may also be present to support and guide the cable lay operations.</p>	
Jointing	<p>The cables would be laid in a bundled configuration in sections of 80 – 100 km. Sections of offshore cables are connected by a cable joint and the cable system would therefore require a number of joints within the Proposed Development due to its length.</p> <p>At each cable joint position, the end of the installed cable would be temporarily left on the seabed whilst the CLV returns to port to pick up a new cable length. A ground wire would be attached to the cable end to enable retrieval when the cable lay vessel returns. The cable end may be temporarily buried into the seabed, marked with a buoy and/or guarded by a guard vessel whilst the cable lay vessel is offsite.</p> <p>The cable joint would be made on board the CLV and would take up to two weeks per joint location. During this time the CLV would maintain position. Once the cable joint has been made, the CLV would continue to lay the new cable section.</p> <p>The joint and cables would be buried (as the preference) or protected by external cable protection, including rock bags or mattresses.</p>	2029 - 2033
Remedial - external cable protection	<p>If any part of the cables cannot be buried to the target depth, remedial cable protection such as rock dumping or mattresses may be installed. In the case of rock dumping, a fall pipe vessel will be used to position the rock over the cables to the desired berm profile. Any remedial works would be subject to conditions.</p>	2029 - 2033
Post-lay survey	<p>Geophysical surveys would be undertaken periodically to monitor cable burial and the status of external cable protection e.g., remedial or at infrastructure crossings.</p> <p>In areas of high seabed mobility, or if post-installation changes in the natural or manmade environment are perceived to have occurred (for example through an increase in adjacent dredging activity), additional survey of specific areas of the cable system may be initiated.</p>	2029 - 2033



### 1.3.2. Environmental Sensitivities

Details of the environmental characteristics of the Proposed Development and environmental sensitivities are further detailed in each of the technical chapters of the Marine Environmental Appraisal (MEAp). **Chapter 15 – Schedule of Mitigation** provides a preliminary list of all environmental mitigation measures being proposed specific to the design and operations of the Proposed Development.

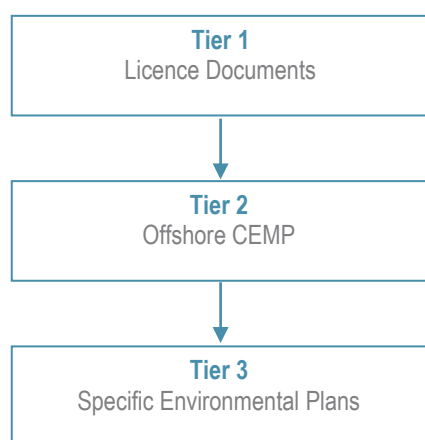
The final CEMP will set out the relevant controls and procedures to be adopted to mitigate the environmental impacts associated with the Proposed Development. These measures will be specific to the final design of the Proposed Development and subject to further stakeholder engagement and in accordance with the approval process under the relevant Marine Licence condition.

### 1.3.3. Environmental Management Framework

#### 1.3.3.1. Document Hierarchy

A three-tiered hierarchy will be in place to ensure that environmental standards will be met and are maintained throughout the Proposed Development. The system is outlined in **Figure 1-2** below:

*Figure 1-2: Document Hierarchy*



The final CEMP will be a Tier 2 document and will be supported by additional topic specific environmental management plans (Tier 3 documents). These Tier 3 plans will sit alongside the CEMP and may be produced at different stages of pre-construction / construction. Once confirmed these will be detailed in **Section 1.5.2**.

#### 1.3.3.2. Relevant Tier 3 Plans

The Tier 3 specific environmental plans that may support the final CEMP include:

- Cable Burial Risk Assessment;
- Marine Mammal Mitigation Plan;
- Marine Pollution Contingency Plan;
- Waste Management Plan;
- Biosecurity Plan;
- Fisheries Management and Mitigation Plan;
- Dropped Object Procedure;
- Vessel Management Plan;
- Written Scheme of Investigation; and
- Protocol for Archaeological Discoveries.

#### 1.3.3.3. Relevant Legislation and Regulations

In addition to the project specific conditions that will be laid out in the consents, all contractors (and their sub-contractors) are responsible for identifying and complying with all relevant UK legislation in place at the time of the activities occurring. The legislative requirements, current standards and best practice measures which define the standards of construction practice adhered to by the contractors shall be outlined within the final CEMP. However, adhering to the final CEMP does not absolve the Applicant, contractors, or subcontractors from the responsibility for complying with legislation and bylaws relevant to their construction activities.





## 1.4. Roles and Responsibilities

Responsibility for the project in relation to the CEMP will be divided into two parts: responsibilities assigned to organisations and those assigned to individual roles. Organisational responsibilities are summarised in Error! Reference source not found. below, and role-specific responsibilities will be outlined in the final CEMP within a RACI (Responsible, Accountable, Consulted, Informed) matrix or similar and will include responsibilities placed for roles such as the Project Director, Contractor Director, HSE Managers and Advisors, Consents Managers, Client Representatives and Fishing Industry Representatives. Contact details will be confirmed post consent with key contacts set out within a Contact Database.

*Table 1-3- Responsibilities*

Organisation	Responsibility	Contact Details
Scottish Hydro Electric Transmission plc (SHE-T)	Licence holder License holder to appoint a suitably competent Engineering Procurement Construction (EPC) Contractor to undertake the work, ensure and monitor compliance with licence conditions and submit notifications.	TBC
Installation Contractor TBC	EPC Contractor Responsible for the manufacture, transport and installation of the offshore power cables. Responsible for discharging environmental consent obligations on behalf of the Licence holder (where required). Responsible for monitoring the environmental performance of all sub-contractors and ensuring that they remain compliant with the CEMP. Responsible for ensuring that environmental audits take place on a regular and planned basis and that all and any suspected breaches of environmental legislation, policy, best practice or guidance are fully investigated and reported, including reporting of spills. Responsible for ensuring that the CEMP is kept up-to-date and available for dissemination to all parties as necessary and appropriate.	TBC
Sub-Contractors TBC	To comply with the requirements of the EPC Contractors Environmental Management Plans	TBC

All contractors will also be required to produce RAMS and implement management controls as appropriate within their RAMS, which shall be reviewed by the Applicant. The RAMS will also make reference to the relevant elements of various guidance that will be implemented as part of their management controls.

## 1.5. Management of Environmental Impacts

### 1.5.1. Aspects and Impacts

All contractors undertaking works for the Proposed Development will be required to produce aspects and impacts registers related to the works. Such registers will include details of:

- Aspects associated with (but not limited to) emissions to air, water, land and groundwater; waste production, storage and disposal; chemical use and management; transport; and use of amenities and utilities; and
- Details of potential impacts, legal and other requirements and environmental management measures.

### 1.5.2. Environmental Commitments and Mitigations

Full details of all commitments and associated mitigations will be provided with the MEAp. A preliminary register of design measures is provided in **Chapter 15 – Schedule of Mitigation**.

The final CEMP will detail the mitigations and other measures included in the various RAMS.



## 1.6. Communication and Reporting

### 1.6.1. Communication Methods

#### 1.6.1.1. Availability and Update of Documents

The CEMP will be updated at least six months prior to construction commencing or within the specified timescales within the Marine Licence, and submitted to MD-LOT, in consultation with relevant stakeholders for review and approval.

It will also be reviewed quarterly during construction. These reviews will focus on:

- changes in roles and responsibilities of the Project team;
- changes in legislative or other requirements;
- changes to processes or procedures; and
- changes in project phases – e.g., the plan will be updated prior to commencement of the operations and maintenance phase of the project.

Subsequent updates, following initial approval of the document by MD-LOT, will be provided to MD-LOT for information and to ensure they hold an up-to-date copy. These actions are mandated as part of the CEMP and would be specified in the Marine Licence conditions.

#### 1.6.1.2. Site Inductions and Training

All contractors (including all sub-contractors) engaged in delivering the Proposed Development have a responsibility to ensure that the relevant environmental information is assessed and appropriately disseminated to site personnel. The key method by which this may be achieved is through the completion of site induction briefings, although additional methods may be employed to ensure industry leading practice is followed.

Site inductions should be held prior to commencement of the offshore construction activities to ensure that all personnel are familiar with the vessel, in particular the safety protocols and location of emergency equipment. Site inductions will typically be given by the Quality, Health, Safety and Environment department and will include environmental awareness and the requirements of this Outline CEMP. The Masters of installation and support vessels will give a safety briefing on board the vessel prior to departure.

Contractors (and their sub-contractors) will provide specific toolbox talk briefings to personnel involved in construction activities prior to commencing work. These talks will detail the environmental risk assessments performed by the contractor(s) and confirm control measures to implement and mitigate the likelihood of the work impacting upon the environment. Subjects for inclusion within toolbox talks may include, but will not be limited to:

- Environmental policy;
- Dealing with oil and chemical spills including types of spill kits and their use;
- Waste management including storage, separation and handling of waste;
- Marine Invasive Non-Native Species (MINNS);
- Marine mammal mitigation procedures;
- Dropped objects; and
- Archaeological compliance and reporting.

### 1.6.2. Communication Protocol

**Table 1-4** details the communication protocol with regard to this Outline CEMP. The final CEMP will outline the communication protocols in more detail.

*Table 1-4 - Communications Protocol*

Issue	Communication Requirements
Change in construction method	Contractor to advise the Applicant (SHE-T) as soon as made aware. The Applicant to advise contractor whether changes should be considered material and appropriate discussions be undertaken with licensing authority.
Change to agreed mitigation	Contractor to advise the Applicant as soon as made aware.



Issue	Communication Requirements
	The Applicant to advise contractor whether changes should be considered material and appropriate discussions be undertaken with licensing authority. The Applicant to liaise with regulators and statutory consultees as appropriate.
Major environmental non-compliance	Contractor to advise the Applicant as soon as made aware. Contractor to advise the Applicant (within 30 minutes) and MD-LOT and other relevant bodies as outlined in relevant Tier 3 document. For the avoidance of doubt, in the event of a major non-compliance incident, the contractor should not delay in implementing appropriate and agreed mitigation measures and reporting the incident directly to the appropriate body. EPC Contractor Project Manager to record all environmental non-compliances in the non-conformance register.
Minor environmental non-compliance	Contractor to advise the Applicant as soon as aware of all incidents on non-compliance, and subsequent actions taken. EPC Contractor Project Manager to investigate all non-compliance incidents. EPC Contractor Project Manager to inform the Applicant of all non-compliance incidents within 24 hours. EPC Contractor Project Manager to record all environmental non-compliances in the non-conformance register.
Waste disposal	Contractor to provide own Waste Management Plan to form part of the Proposed Development's final CEMP.
Stakeholder communication	Consents and environmental related communication to be managed by either EPC Contractor or the Applicant as appropriate. Contractor(s) should not engage directly with statutory stakeholders on matters concerning licences, consents or permissions without prior agreement from the Applicant (except in cases of emergency).

### 1.6.3. Monitoring Environmental Impacts

The EPC Contractor will maintain all environmental registers required under the Marine Licence conditions and make these available to the Applicant (SHE-T) throughout the duration of the works.

Contractors (and their sub-contractors) shall document the results of compliance with the relevant environmental standards and this Outline CEMP throughout the project via the Daily Progress Report (DPR) and shall provide any supporting documentation on a regular basis (e.g., weekly and/or monthly). Each and any contractor(s) shall be responsible for appointing their own company Environmental Manager who shall manage, co-ordinate and check compliance with this Outline CEMP throughout their involvement in the Proposed Development.

### 1.6.4. Recording and Reporting Environmental Impacts

All contractor(s) shall monitor and record environmental impacts related to their involvement during construction, including but not limited to:

- Waste types and amounts in accordance with their Waste Management Plan;
- Audit and inspection results;
- Compliance with consent conditions;
- Reported incidents including near misses; and
- Environmental non-compliance.

This information must be reported to the Applicant as part of the contractor's monthly progress report.

### 1.6.5. Auditing and Inspection for Environmental Compliance

The EPC Contractor Client Representative onboard the vessel will monitor onboard activities to ensure compliance with the final CEMP. The final CEMP will also be reviewed after each construction phase and any lessons learned/actions identified during the review will be carried forward to an update.

MD-LOT may also conduct periodic site inspections to monitor compliance with consents and approved plans. The Applicant will facilitate access to all offshore construction activities for this purpose, with appropriate prior notification.



#### 1.6.6. Non-Compliance, Corrective and Preventive Action

Through monitoring of environmental performance, the Applicant will identify if any non-compliance (excluding spills which should be managed according to the MPCP) against the Proposed Development consents or management plans have occurred. Non-compliance will be documented by the EPC Contractor Project Manager in a Non-Compliance Report (NCR) and reported to the appropriate responsible person.

Appropriate personnel will be appointed to investigate the non-compliance and ensure all mitigation measures are implemented, and preventative action is taken. A deadline for closure of the non-compliance will be determined according to the urgency and severity of the non-compliance. Where the non-compliance comprises of a serious or repeated environmental breaches (i.e. legal or regulatory breach) the EPC Contractor Project Manager (or other appointed person) shall request an improvement plan to be developed by the applicable contractor. This shall include identification of root causes, remediation measures, timescales for implementation and those responsible for the close out of the improvement plan.





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