




Cambois Connection – Marine Scheme


Volume 5 Appendix 5.1 Annex A

Outline Marine Pollution Contingency and Control Plan

	Outline Marine Pollution Contingency and Control Plan	
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1. Introduction

1.1. Purpose

This outline Marine Pollution Contingency and Control Plan (MPCCP) has been prepared by Berwick Bank Wind Farm Limited (BBWFL), a wholly owned subsidiary of SSE Renewables (SSER) Limited hereafter referred to as ‘the Applicant’, to support the Environmental Statement (ES) for the Marine Scheme of the Cambois Connection.

As the Marine Scheme extends over both Scottish and English waters, this outline MPCCP serves as an outline MPCCP for the Marine Scheme in Scottish waters and an outline MPCCP for the Marine Scheme in English waters.

This outline MPCCP provides measures and procedures to safeguard the marine environment and respond to any potential accidental pollution event during the construction, operation and maintenance, and decommissioning phases of the Marine Scheme as far as reasonably practicable so that effects on the environment are ideally avoided or reduced as far as reasonably practicable. 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 Marine Scheme.

A MPCCP for the Marine Scheme in Scottish waters and a MPPCP for the Marine Scheme in English waters will be developed post-consent for submission prior to construction to the Marine Directorate Licensing Operations Team (MD-LOT) and the Marine Management Organisation (MMO) respectively. The MPCCPs for Scottish and English waters respectively will be closely coordinated by the Applicant. The MPCCP for the Marine Scheme in Scottish waters will be closely coordinated with the Berwick Bank Wind Farm (BBWF) Marine Pollution and Contingency Plan.

The outline MPCCP is a ‘live’ document and as such it will be further developed post-consent in consultation with regulatory bodies and stakeholders (refer to section 1.2).

This outline MPCCP has been developed with respect to feedback provided from consultees as part of the Marine Scheme Scoping Opinions (MD-LOT, 2022; MMO, 2022), where it was highlighted that management plans should be “adequate” to be used as mitigation measures where they are key to reducing impacts.


This outline MPCCP represents best practice for pollution preparedness, and it is widely regarded within industry as best practice to have a MPCCP in place where there is a risk of pollution, even when this is considered to be a low risk.

1.2. Scope

This outline MPCCP is a sub-plan to the Marine Scheme outline 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 Marine Scheme (up to mean high water springs (MHWS)) during the construction, operation and maintenance, and decommissioning phases.

The outline MPCCP 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 Marine Scheme:

- 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).

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The information and guidelines presented in this outline MPCCP will be reviewed in consultation with the Maritime and Coastguard Agency (MCA), Marine Directorate - Licencing Operations Team (MD-LOT), the Marine Management Organisation (MMO) and the Environment Agency and will be re-submitted as final prior to commencement of construction.

All personnel and Contractors (including any sub-contractors) involved in the Marine Scheme will be required to comply with this MPCCP and will be provided with a copy of the MPCCP and will be familiarised with the content, including roles and responsibilities, through toolbox talks.

All vessel contractors associated with the Marine Scheme 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.

1.3. Consent Conditions

Table 1.1 lists the consent conditions included in the Marine Licence(s) in relation to marine pollution. The information in this table will be populated once consents are received.

Table 1-1 Consent Conditions to be Discharged by this MPCCP

Consent Document	Consent Condition Reference	Consent Condition	Reference to Relevant Section of this MPCCP
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1.4. Document Revision

The Applicant will refine the MPCCP before commencing construction and review this plan thereafter (maximum of one review per year) during the construction phase of the Marine Scheme (e.g. to take into account any new information, that may become available).

This MPCCP will also be reviewed and amended after construction is completed, to make it applicable to the operation and maintenance phase of the Marine Scheme. A similar update will be carried out for the decommissioning phase.

Following completion of construction, the MPCCP is reviewed and amended after significant legislative or procedural changes that would require updates to be made to the MPCCP, as necessary for the operation and maintenance, phase of the Marine Scheme.

2. Summary of Designed-In Measures, Mitigation and Monitoring Included in the Marine Scheme ES

Table 2.1 provides a summary of the designed in measures identified in the Marine Scheme ES relevant to the MPCCP.


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Table 2-1 Designed in Measures Relevant to the MPCCP

Designed in Measures	Justification
Development of, and adherence to, an EMP, including MPCCP	<p>An EMP will be developed and employed to ensure potential release for pollutants will be reduced as far as practicable. This will include a MPCCP and an Invasive and Non-Native Species Management Plan (INNSMP). An outline EMP and an INSSMP have been provided as part of this application (Volume 5, Appendix 5.1 and Volume 5, Annex 5.1.B) and will be updated for submission to MMO and MD-LOT prior to construction.</p> <p>An MPCCP will be implemented to ensure that, in the unlikely event that a pollution event occurs, any spillage is reduced as far as reasonably practicable and effects on the environment are ideally avoided or reduced as far as reasonably practicable. 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 Marine Scheme. This will include but may not be limited to: designated areas for refuelling where spillages can be easily contained; storage of chemicals in secure designated areas in line with appropriate regulations and guidelines; only using substances approved on Cefas list under the Offshore Chemical Regulations (UK Government, 2002); double skinning of pipes and tanks containing hazardous substances; and storage of these substances in impenetrable bunds. This will control the potential release of contaminants from supply and service vessels.</p> <p>This document constitutes an outline MPCCP which has been provided as part of this application and will be updated for submission to MMO and MD-LOT prior to construction</p>
Shipboard Oil Pollution Emergency Plan (SOPEP)	All vessels to be used as part of any phase of the Project will adopt a waste management plan in line with the requirements set out as part of the International Convention for the Prevention of Pollution from Ships (MARPOL) and the SOPEP.

3. Roles and Responsibilities


3.1. The Applicant

The Applicant will contractually require Contractors and Subcontractors to take responsibility for pollution events originating from their activities on the Marine Scheme.

3.2. The Applicant Environmental Manager

The Applicant Environmental Manager for the Marine Scheme is responsible for the overall preparation and implementation of the MPCCP, including the following duties:

- preparing and maintaining the MPCCP as set out in section 2.4;
- requiring Contractors to develop MPCCPs (which should include adequate pollution prevention and spill response procedures), and that these are reviewed to an agreed schedule and implemented throughout operations;
- appointing a Marine Coordinator and a dedicated Spill Response Contractor for the Marine Scheme; and
- Leading internal meetings held in the event of any oil or chemical spill to the marine environment, following the completion of remedial action to close out the incident and discuss any lessons learnt.

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3.3. Marine Coordinator

A Marine Coordinator will be appointed by the Applicant before construction at the Marine Scheme commences. As well as coordinating the day to day vessel activity at the Marine Scheme, the Marine Coordinator will be the Applicant’s main point of contact should an emergency or pollution event occur.

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 and regulatory bodies.

In English waters, it is acknowledged that the Maritime Rescue Co-ordination Centres act as co-ordinators during incidents and circulate all pollution or situation reports to the Marine Management Organisation (MMO) for English waters (HM Government, 2018).

3.4. Contractor and Subcontractor

Most of the construction, operation and maintenance, and decommissioning activities at the Marine Scheme will be carried out by Contractors and/or Subcontractors, thus the Applicant will contractually require they are familiar with and comply with this MPCCP.

Furthermore, each Contractor/Subcontractor will be expected to prepare their own MPCCP before activities commence at the Marine Scheme. The Contractor/Subcontractor MPCCP will be required to comply with this MPCCP. The Contractor/Subcontractor will also be required to prepare their own spill response arrangements, including reporting and response procedures. Each Contractor/Subcontractor will be required to maintain a spill risk register for all equipment to be used at the Marine Scheme.


All Contractor/Subcontractors will be expected to ensure relevant personnel are trained in pollution prevention and response and that vessels contain appropriate pollution response equipment.

All vessels working in the Marine Scheme will be subject to the requirements of the Applicant Vessel Inspection Procedure which includes the following aspects:

- Safety;
- Construction;
- Control Systems;
- Onboard machinery; and,
- Electrical Equipment.

The Applicant Vessel Inspection Procedure should cohere with codes of practice outlined by the MMO (2022), specifically for the Marine Scheme *the Safety of Small Workboats and Pilot Boats*. To prevent pollution, the Applicant Vessel Inspection Procedure requires all Contractor and Subcontractors vessels to provide all of the following:

- There should be an implemented system for the proper disposal of oily water mixtures, noxious liquid substances, sewage, and garbage.
- There should be established procedures, appropriate equipment, and adequate arrangements to prevent any oil from entering the water.
- The oily-water separator system should be fully operational.
- Adequate spill response equipment should be readily available.
- Appropriate and up-to-date Shipboard Oil Pollution Emergency Plan/Shipboard Marine Pollution Emergency Plan (SOPEP / SMPEP) for vessel type and area of operation, including record of drills should be available.
- Oil record book and garbage log should be maintained and up to date.

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- The vessel should have implemented ballast-water management plans in place as applicable.

Furthermore, as part of the Applicant Vessel Inspection Procedure:

- Crew should be able to demonstrate competence with emergency equipment, including pollution response.

In addition 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).

The Applicant will contractually require the Marine Coordinator to be notified by the Contractor/ Subcontractor of any pollution incidents at the Marine Scheme, together with any proposed response procedures.

3.5. Vessel Master

Any marine pollution incidents should be reported 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 the respective 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.

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.

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.

3.6. Spill Response Contractor

An oil Spill Response Contractor must be in place before construction commences at the Marine Scheme.


During the construction phase, the 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.

During the operation and maintenance phase, the oil Spill Response Contractor will provide response capabilities, coordinating as necessary with the Environmental Manager, in relation to the maintenance activities carried out at the Marine Scheme.

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 MCA, NLB, MD-LOT, and MMO.

3.7. Maritime and Coastguard Agency

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 provides no rigid criteria for NCP activation however it is considered very unlikely that the NCP will

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be activated for spills originating from activities related to the Marine Scheme due to the relatively low risk of spills from cable installation activities.

4. Potential Spill Sources and Control Measures

4.1. Potential Spill Sources and Control Measures

Construction, operation and maintenance, and decommissioning works will be undertaken in such a manner as to minimise the risk of spills and accidental pollution events.

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 Marine Scheme). 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 Marine Scheme are considered likely to be small (Tier 1).

The Contractor/Subcontractor MPCCP 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 Marine Scheme. 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 Marine Scheme.

A register of all the vessels involved in construction and operation activities at the Marine Scheme 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 Marine Scheme.

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.


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

Potential spill scenarios will be dictated by the chemical inventories (including hydrocarbons) associated with activities associated with the Marine Scheme.

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:

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- 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.

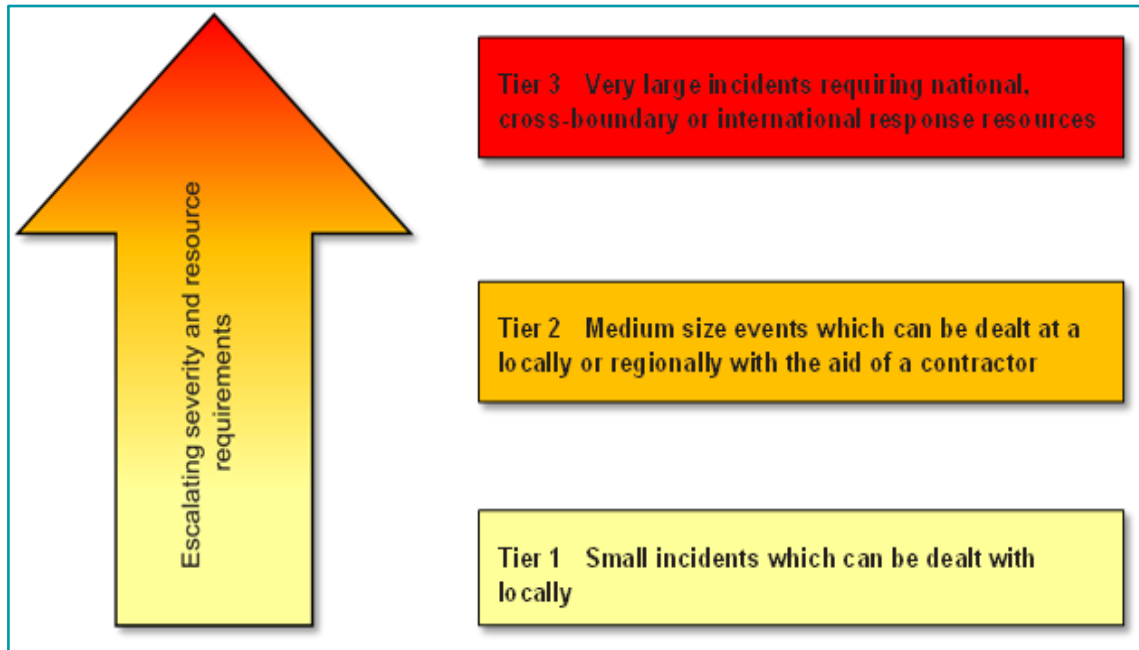


Figure 4.1: Tier Definition (based on MMO, 2020)

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. Marine Scheme Potential Spill Scenarios and Control Measures

Table 4.1 describes the potential spill scenarios and control measures identified for the Marine Scheme. This table will be refined prior to commencement of construction and adapted accordingly for the relevant Contractor MPCCP and as such 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 Marine Scheme commences.

The main source of hydrocarbons associated with the Marine Scheme 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 as a result of a two vessel collision.




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Table 4.1: Potential Spill Scenarios and Control Measures for the Marine Scheme


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.	Preparation and review of task specific risk assessments, method statements and fuel transfer planning tools and checklists.		
	Equipment Refuelling	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.	Low	Tier 2
	Loss of fuel during refuelling of equipment (on vessel).	<p>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.</p> <p>A bunker plan shall be developed and posted on the Bridge and in the Machinery Control Room.</p> <p>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:</p> <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. <p>Only hoses fitted with non-return valves shall be used for the offshore transfer of fuel or other fluids.</p> <p>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.</p>		

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Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
		<p>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.</p>		
		<p>All storage tanks and/or areas shall be banded to at least 110% of the total oil storage inventory volume.</p>		
		<p>Spill kits shall be readily available for clearing any minor spills.</p>		
		<p>Regular inspection and maintenance of equipment will be carried out during operations.</p>		
		<p>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.</p>		
		<p>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.</p>		
Vessel to Vessel Collision Loss of fuel from collision between two vessels.		<p>To prevent vessel to vessel collisions and vessel to structure allisions, all vessels involved in the Marine Scheme shall comply with project specific navigational requirements prepared 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.</p>	Very Low	Tier 2
Vessel to Structure Allision Loss of fuel from allision between vessel and structure (e.g. wind turbine).			Very Low	Tier 2
Vessel Stranding/Grounding		<p>To prevent vessel stranding/grounding, all vessels involved in the Marine Scheme will comply with project specific navigational requirements prepared in advance of the construction phase and shared with all Contractors working onsite.</p>	Very Low	Tier 2

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Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
	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. 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.		
	Spillage During Use of Equipment	Preparation and review of task specific risk assessments and method statements.	Low	Tier 1
	Small spills during equipment operation.	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. Oil pressure pipes and fuel oil pipes and fittings will be inspected regularly to detect any leaks and rectify them at an early stage.		
Lubricating Oil	Incident	To prevent vessel to vessel collisions and vessel to structure collisions all vessels involved in the Marine Scheme shall comply with project specific navigational requirements prepared in advance of the construction phase and shared with all Contractors working onsite. Marine coordination measures	Very Low	Tier 2

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Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
	Loss of lubricating oil from collision between two vessels, or allision between vessel and structure, or stranding/grounding of vessel.	set out prior to commencement of activities on site will also be followed by vessels and marine coordinators to prevent collisions.		
	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.		
	Failure of Plant or Equipment	Fittings will be inspected regularly to detect any leaks and rectify them at an early stage. 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	To prevent vessel to vessel collisions and vessel to structure allisions all vessels involved in the Marine Scheme shall comply with project specific navigational requirements prepared 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.			
	Failure of Plant or Equipment	All equipment shall be operated and maintained in good order and in accordance with legal requirements.	Low	Tier 1


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Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
	Release of hydraulic fluid oil due to failure of plant or equipment (e.g. hydraulic hoses).	<p>All plant and equipment shall only be operated by adequately trained and competent personnel.</p> <p>All storage tanks and/or areas shall be banded to at least 110% of the total oil storage inventory volume.</p>		
	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	To prevent vessel to vessel collisions and vessel to structure collisions all vessels involved in the Marine Scheme shall comply with project specific navigational requirements prepared 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 chemical load from vessel collision/allision, or stranding/grounding vessel.			
	Spillage During Use	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.	<p>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.</p> <p>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.</p> <p>Control of Substances Hazardous to Health (COSHH) assessments should be conducted for development specific hazardous substances.</p> <p>Segregated storage facilities will be used to control the separation of hazardous substances.</p>		

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Potential Pollutant	Spill Scenario	Control Measures	Likelihood with Control Measures	Likely Tier
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Chemicals will, where relevant, be selected, stored and managed in accordance with relevant regulations and legislation.

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5. Response Procedures and Checklists

5.1. Pollution Incident Response Procedure

5.1.1. Introduction

Any spill (actual or likely) into the marine environment, irrelevant of its size and whether it arises from the activities at the Marine Scheme 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 Marine Scheme.

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.

5.1.2. Spills Originating from a Vessel – Response and Notification Overview

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, operation and maintenance, or decommissioning at the Marine Scheme, the steps described below should be followed:


- any Applicant/Contractor/Subcontractor personnel or employee observing a spill (Spill Observer) must notify the Contractor/Subcontractor Vessel Master as soon as a spill 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) (if within Scottish Waters) and Humber CGOC (if within English Waters) 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 outline EMP, Volume 5, Appendix 5.1); 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.

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 Marine Scheme – Response and Notification Overview

The following steps should be followed when the spill originates from an installation associated with the Marine Scheme:

- the Spill Observer must report the spill to the Applicant Environmental Manager as soon as it is observed;
- the Applicant Environmental Manager will report the spill as soon as it is safe to do so, to Aberdeen (if within Scottish Waters) and the Humber (if within English Waters) CGOC via phone, and notify the

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- Marine Coordinator 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 MPCCP 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, if practicable. The primary responder will request support from a specialist Spill Response Contractor as required.

5.1.4. Spills within a Port

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 MPCCP will provide details of all ports/harbour authorities of relevance.

The Contractor/Subcontractor will provide details in advance of their works to the Applicant, of the main ports/harbour authorities anticipated to be used whilst working on the Marine Scheme, and therefore contact details will be updated by the Contractor/Subcontractor. All incidents that occur, whether in the Marine Scheme working area or not, must be notified to the Applicant Environmental Manager and Marine Coordinator.

5.2. Reporting Requirements

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.

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.


In the event of a pollution incident from a Marine Scheme installation, the Spill Observer shall notify the Applicant Environmental Manager who shall then notify CGOC and the MCA and the Marine Coordinator.

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 CGOC and the MCA.

5.2.2. Statutory Reporting Requirements

Within Scottish Waters, there is a statutory requirement to report marine pollution incidents to Marine Scotland (HM Government, 2018) and the Scottish Environment and Protection Authority (SEPA) for coastal waters (Scottish Government, 2022). The Contractor or Subcontractor must report any spill incident to the Applicant 24-hour reporting line within 30 minutes of the incident occurring.

If within English Waters, the local coastguard should be informed of any marine pollution incidents immediately through the nearest coastguard station (Hull Marine Office). Maritime Rescue Co-ordination Centres act as co-ordinators during incidents and circulate all pollution or situation reports to the Marine Management Organisation (MMO) for English waters. In the case of major spills, any spraying of dispersants is normally supervised by the MCA. The MMO and statutory nature conservation agencies will be closely involved when there are important environmental or fisheries concerns. With less serious spills it is up to those dealing with the incident to make direct contact with the MMO before any oil spill treatment products are used. In coastal waters, including areas within harbour limits, formal approval will usually be required (MMO 2020).

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The flow chart in Figure 5.1 should be followed for all responses.

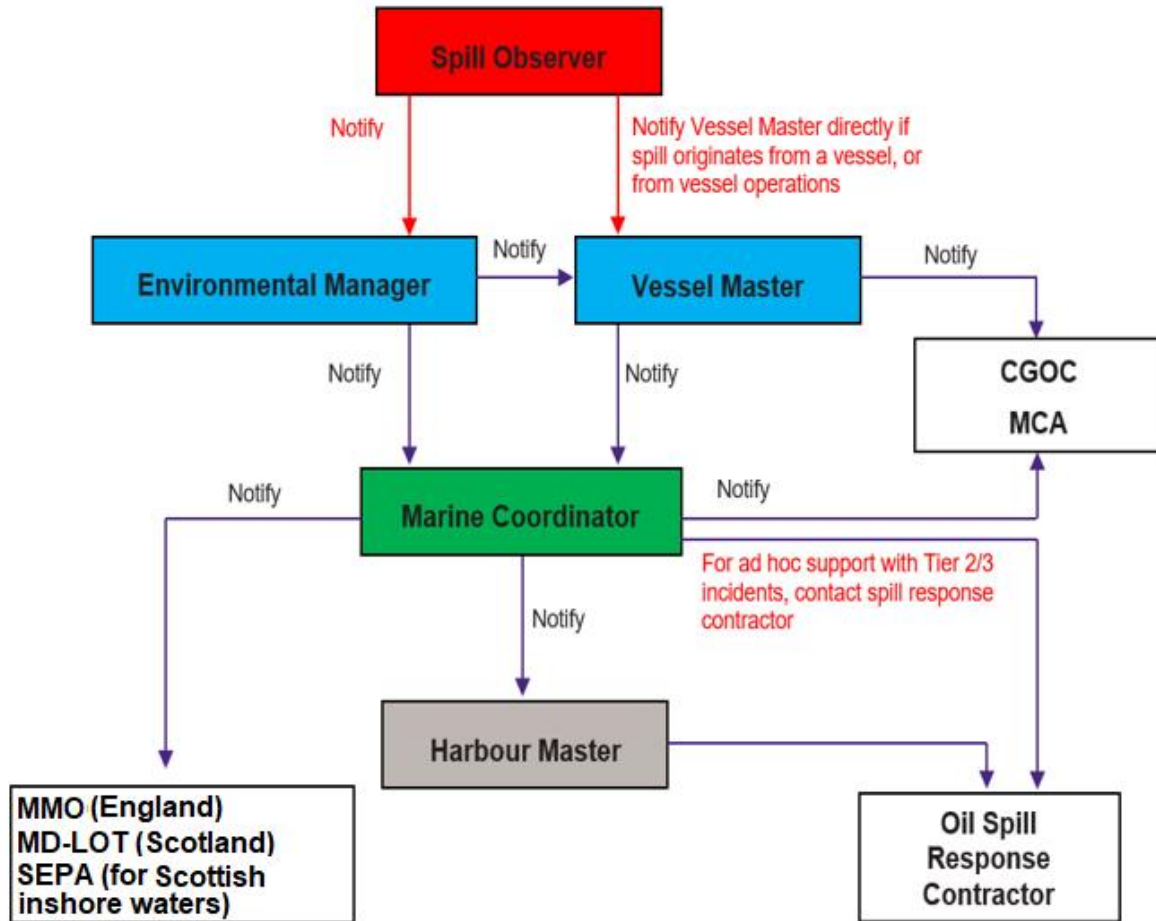


Figure 5.1: Reporting Requirements for any Potential Spills at the Marine Scheme

5.2.3. Response Checklists

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.


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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, if spill originates from a vessel or vessel operations, the 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 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 spilled 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	

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Actions to be Completed by the Marine Coordinator

- 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).
- 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

- If the spill is a Tier 1 incident, monitor the Contractor's response to the incident.

Within English Waters:

- Ensure the incident is reported to the MMO.
- Notify MCA.

Within Scottish Waters:

Report the incident to Marine Scotland via telephone as soon as possible (refer to [Policy – Pollution Scottish Government \(2022\)](#) for contact details). Give Marine Scotland full information on the location of the incident, time, quantity spilled, movement and current spill status. 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.

- Ensure the spill is being tracked and determine likely movement (e.g. towards other installations/environmentally sensitive areas/coastal areas).
- Work with the Applicant Environmental Manager or Vessel Master to prevent or reduce further spillage without endangering the safety of personnel.
- Ensure all other installations and vessels in the vicinity have been informed of the spill if deemed necessary.
- Notify other internal and external stakeholders as appropriate, such as the Applicant management, other Regulators, etc. Specific stakeholders to be notified would be defined on a per contract basis with others being identified and/or removed as the project progresses.
- 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.
- 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, MCA and/or a Spill Response Contractor.

- Seek advice from the relevant Port Authority or Tier 2 spill response contractor on the following:
 - 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.

- Work with the relevant Port Authority/Spill Response Contractor to manage the incident.
- Ensure that a daily notification is made to Marine Scotland/MMO for the duration of the incident.

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Actions to be Completed by the Marine Coordinator

Close out Actions

- In cooperation with the Harbour Master, make an assessment of when to demobilise the response.
Commence “stand-down” procedures as follows:
- ensure the MMO/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.
 - Collect copies of Incident Logs.
 - 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

- On notification from the Marine Coordinator, record all details of the incident and all incoming information.
- Notify the MCA/ CGOC and other vessels/installations in the vicinity if necessary.

Ongoing Actions

- In the event that the spill is a Tier 1 spill, monitor the response to the incident. Request confirmation from the Marine Coordinator that the spill is being managed effectively.
- 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.
- 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 Marine Scheme are considered highly unlikely.

Close out Actions

- For a Tier 2 response, in consultation with the Marine Coordinator, make an assessment of when to demobilise the response. Commence “stand-down” procedures as follows:
- 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.
 - Ensure that a “lessons identified” profile is available quickly so that remedial action and the possible upgrading of procedures can take place.
 - 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

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 within English Waters

It is expected that any spills associated with the Marine Scheme will be Tier 1 spills due to the small inventories of oil/chemicals and the low risk nature of activities to be carried out.

In the event of a Tier 2 incident, it is expected that a Standing Environment Group (SEG) will form, convened by the MCA, to provide advice on environmental aspects and public health impacts of the incident and associated responses operations. SEGs are based on locality: for the Marine Scheme a

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North East England SEG would form. This would like include statutory nature conservation bodies relevant to the location of the pollution incident. If beyond 12 nm an offshore SEG would be formed.

The MMO’s representation will be from Local MMO Staff, with approvals for dispersant use coming from MMO headquarters. The Approved Oil Spill Treatment Products are listed here: [Approved oil spill treatment products - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/approved-oil-spill-treatment-products) (MMO, 2023) CEFAS will attend the SEG if requested by MCA, MMO or others within the SEG. Local MMO staff can act as environmental liaison officers within the SEG.

The underlying principle for all SEG members is to provide informed advice to the oil/chemical spill response team, acting as a collective environment group. In addition, they are the MMO’s eyes and ears during an incident and can take critical decisions following liaison with the MPRT Marine Pollution Response Team in MMO headquarters.

5.3.3. Response Strategies for Tier 2/3 Incidents within Scottish Waters

It is expected that any spills associated with the Marine Scheme will be Tier 1 spills due to the small inventories of oil/chemicals and the low-risk nature of activities to be carried out.

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.

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). Again, if beyond 12 nm an offshore SEG would be formed.

Figure 5.2 details the environmental sensitivities in the vicinity of the Marine Scheme that will require consideration during a Tier 1 to 3 spill.

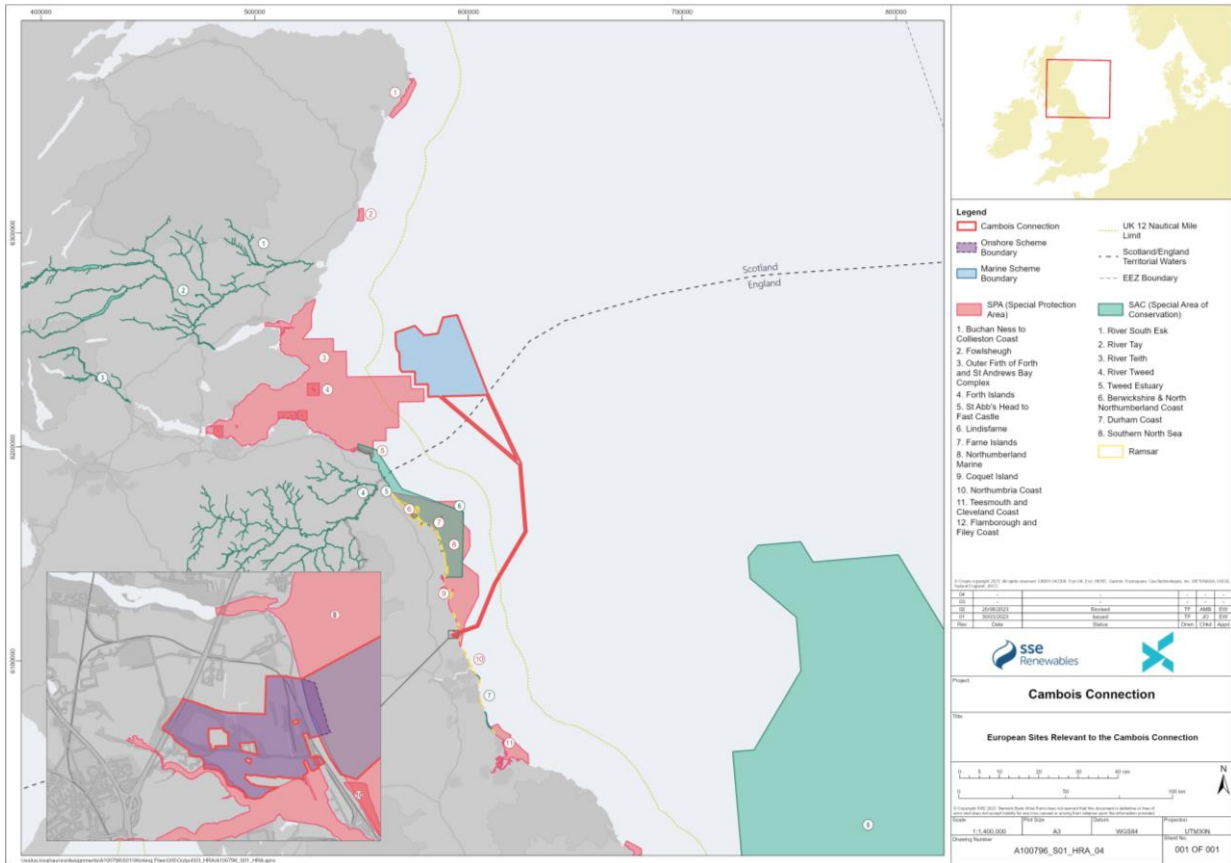




Figure 5.2 European Sites Relevant to the Cambois Connection

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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?	<i>Yes – mark as approved</i>		<i>No – explain to proponent what further information is needed</i>	
Signed off by Operations Manager:				
Name:				
Date:				

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7. Spill Assessment Checklist

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: Wind speed and direction; State of tide; Current speed and direction; and Sea state.

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9. Contacts Directory

Organisation	Contact	Telephone (office hours)	24 hr. Telephone	Mobile/Pager/Email
The Applicant				
Applicant Environmental Manager				
Marine Coordinator				
Marine Management Organisation				
Incident Communication Centre				
Marine Scotland				
Incident Communication Centre				
Coastguard and MCA				
CGOC				
MCA				
Port Authorities				
Other Installations				
<i>Refer to Oil Spill Contingency Plan for full list of all other companies</i>				
Environmental Agencies				

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)				

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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). 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). Accessed on: 23 May 2022.

MMO (2020). *Marine Pollution Contingency Plan*. Available at: [Marine_Pollution_Contingency_plan.pdf](#) (publishing.service.gov.uk). Accessed on: 19 June 2023.

MMO (2022). Small Commercial Vessel Registrations, Surveys and Inspections. Available at: [Small commercial vessel registrations, surveys and inspections - GOV.UK \(www.gov.uk\)](#). Accessed on 12 July 2023.

MMO (2023). *Approved Oil Spill Treatment Products*. Available at: [Approved oil spill treatment products - GOV.UK \(www.gov.uk\)](#). Accessed on: 20 June 2023.

Scottish Government (2022). *Policy – Pollution*. Available at: Pollution - gov.scot (www.gov.scot). Accessed on: 19 June 2023.