Environmental Impact Assessment Report
Volume 4: Outline Environmental Management Plan

MarramWind Offshore Wind Farm

December 2025

MarramWind

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Contents

1. Introduction

1.1 Overview

1.1.1.1 This Outline Environmental Management Plan (EMP) has been produced along with the Environmental Impact Assessment (EIA) Report). The Outline EMP relates to the offshore infrastructure components of the Project only and aims to establish the framework to inform the Final EMP, which will be completed post-consent and prior to construction. The Final EMP will be reviewed before the operation and maintenance (O&M) and decommissioning stages.

1.1.1.2 This Outline EMP relates to M-121 of **Volume 3, Appendix 5.2: Commitments Register**.

1.1.1.3 An Outline Construction Environmental Management Plan relating to the onshore infrastructure components of the Project has been developed alongside this Outline EMP. It will be implemented to manage the specific environmental risks associated with construction of the Project onshore (see **Outline Construction Environmental Management Plan**).

1.2 Project background

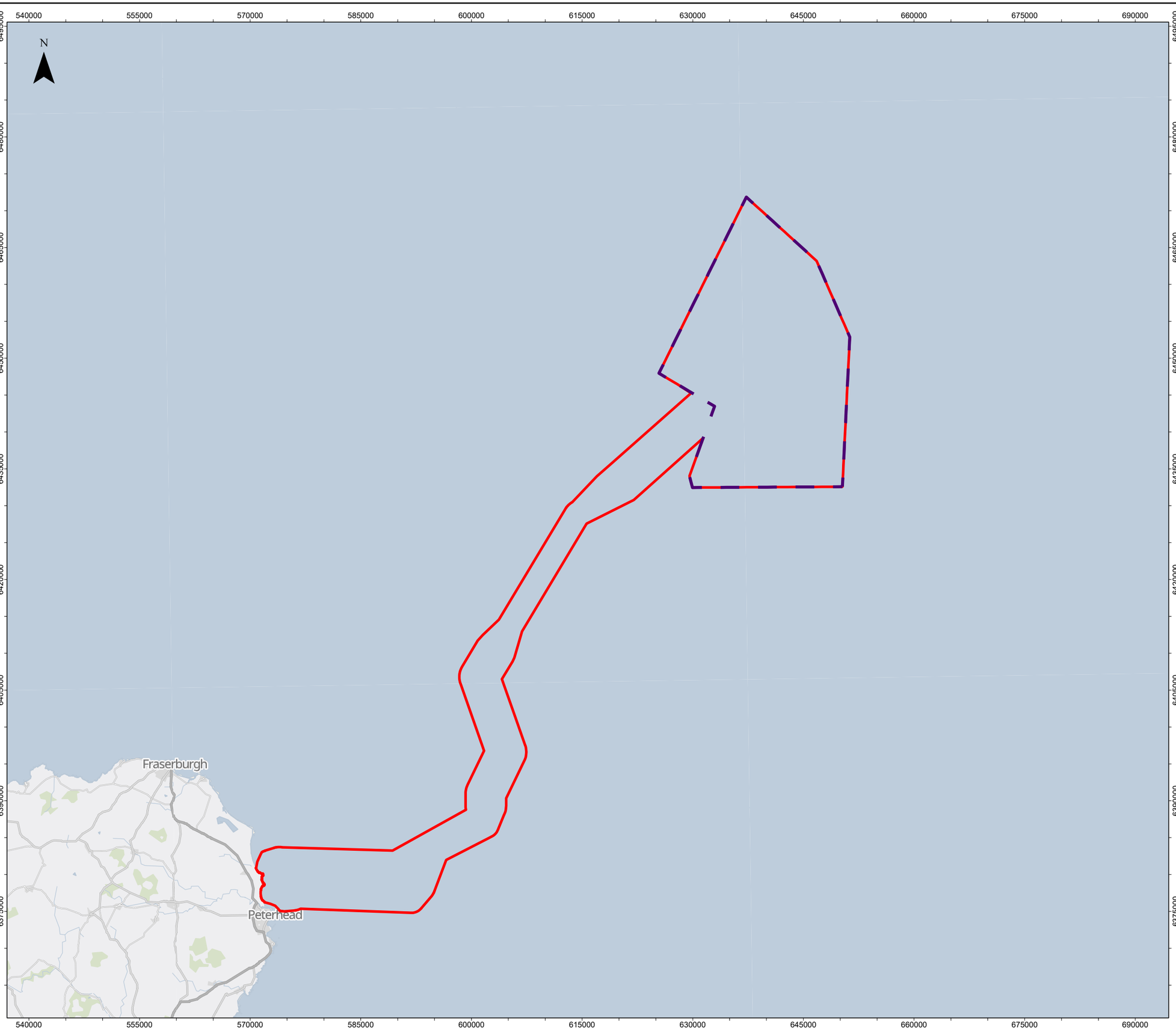
1.2.1.1 MarramWind Offshore Wind Farm (hereafter referred to as 'the Project') is wholly owned by ScottishPower Renewables UK Limited (SPR). MarramWind Limited, a subsidiary of SPR, is the Applicant for the Project.

1.2.1.2 MarramWind Offshore Wind Farm (hereafter, referred to as ‘the Project’) is a proposed floating wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts. The location of the Project is determined by the Option Area Agreement, which is the spatial boundary of the Northeast 7 (NE7) Plan Option within which the electricity generating infrastructure will be located. The NE7 Plan Option is located north-east of Rattray Head on the Aberdeenshire coast in north-east Scotland, approximately 75 kilometres (km) at its nearest point to shore and 110km at its furthest point. An Option to Lease Agreement for the Project within the NE7 Plan Option was signed in April 2022.

1.2.1.3 A summary of the Project is provided in **Volume 1, Chapter 1: Introduction** and a comprehensive description of the Project is provided in **Volume 1, Chapter 4: Project Description** of the EIA Report.

1.2.1.4 The Project's offshore infrastructure, located seaward of Mean High Water Springs (MHWS) is located within the Offshore Red Line Boundary (see **Figure 1**), and includes the following:

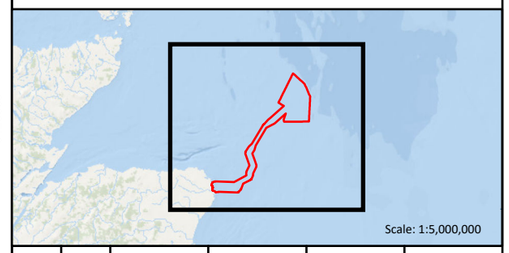
- wind turbine generators (WTGs), including WTG floating units (platforms and station keeping system);
- array cables;
- subsea distribution centres;
- subsea substations;
- offshore substations;
- reactive compensation platform(s) (if required); and
- offshore export cables to connect the offshore infrastructure to the landfall(s).



Offshore Red Line Boundary

Option Agreement Area

0 10 20 Kilometres



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PROJECT TITLE

MarramWind Offshore Wind Farm

DRAWING TITLE

Figure 1 Offshore Red Line Boundary

Environmental Impact Assessment Report
Volume 4 Outline Environmental Management Plan

NOT TO BE USED FOR NAVIGATION

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1.2.1.5 The EIA Report accompanies applications for offshore consents, licences and permissions for the Project to Marine Directorate - Licensing Operations Team (MD-LOT) under Section 36 (s.36) of the Electricity Act 1989, the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009, for the offshore infrastructure seaward of MHWS.

1.2.1.6 The EIA Report also accompanies an application to Aberdeenshire Council for planning permission in principle consent under The Town and Country Planning (Scotland) Act 1997, for the onshore infrastructure landward Mean Low Water Springs (MLWS).

1.2.1.7 There are four sets of EIA regulations applicable to the Project: the Electricity Works (EIA) (Scotland) Regulations 2017 for offshore generating stations requiring s.36 consent; the Marine Works (EIA) (Scotland) Regulations 2017 and the Marine Works (EIA) Regulations 2007 for marine licence applications within Scottish territorial waters (0 to 12 nautical miles) and offshore waters (12 to 200 nautical miles) respectively; and the Town and Country Planning (EIA) (Scotland) Regulations 2017 for planning applications submitted to Aberdeenshire Council for onshore infrastructure located landward of MLWS.

1.3 Purpose of the Outline Environmental Management Plan

1.3.1.1 The Outline EMP will form the basis of the Final EMP. The Final EMP will be finalised and approved post-consent and approved as part of conditional discharge prior to construction, by Scottish Ministers in accordance with s.36 and associated marine licences. The Final EMP will be further reviewed and updated as necessary prior to the O&M and decommissioning stages.

1.3.1.2 This Outline EMP sets out the environmental management approach; strategies; and mechanisms that will be put in place and adopted by the Applicant, in addition to any third party contractors and sub-contractors as appropriate. The purpose of these measures is to protect the marine environment during all stages of the Project of the Project. It includes defined roles and responsibilities relating to environmental management, reporting procedures put in place to manage specific environmental issues (for example, waste management and pollution prevention) as well as management measures to prevent adverse environmental impacts (for example, introduction of invasive non-native species (INNS).

1.3.1.3 The broad objectives of the EMP are as follows:

- To provide a mechanism to ensure that measures to mitigate potentially adverse environmental impacts are implemented throughout all stages of the Project, as presented in **Volume 3, Appendix 5.2**.
- To promote and meet good industry practice standards throughout the relevant stages of the Project; and
- To provide a framework for compliance auditing (with quarterly audits) and inspection to enable the Applicant to be assured that the necessary levels of environmental performance are being met.

1.3.1.4 The Final EMP shall state the legislative requirements, current standards of practice and best practice measures that define the standard of construction, O&M and decommissioning practice adhered to by the Contractors. However, adhering to the Final EMP does not absolve the Applicant, contractors or subcontractors from complying with legislation and bylaws relevant to their construction, O&M and decommissioning activities.

1.4 Legislation and guidance

1.4.1.1 The Outline EMP has been developed with reference to the following key legislation and guidance:

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

1.5 Implementation of the Final EMP

1.5.1.1 The Final EMP approved by Scottish Ministers will be incorporated into the contracts for Principal Contractors responsible for the works. All parties involved, including Principal Contractors, subcontractors and their suppliers, must comply with the relevant provisions of the detailed Final EMP. They are obligated to provide documentation outlining how they will guarantee both the implementation and monitoring of the Final EMP requirements.

1.5.1.2 The EMP is an iterative document that develops throughout the development and refinement of the Project's detailed design process, procurement and construction.

1.5.1.3 **Section 2** provides further information on the implementation of the EMP.

1.6 Scope of Outline EMP

1.6.1.1 This Outline EMP covers the following:

- Part 1 includes information on management, implementation and communication, including information on:
  - roles and responsibilities;
  - communications and reporting procedures; and
  - environmental training and awareness.
- Part 2 includes information on environmental impacts and control measures relevant to key environmental aspects of the Project with specific reference to the potential environmental impacts and mitigation commitments. This includes:
  - overarching environmental management and compliance;
  - marine species including INNS and biosecurity;
  - marine heritage and wider environmental receptors;
  - waste and chemical management;
  - unexploded ordnance (UXO); and
  - dropped objects.

1.6.1.2 The Final EMP will be underpinned by a MarramWind Health, Safety Security and Environment (HSSE) policy that will be applicable to all MarramWind employees, including its contractors, subcontractors or wider third parties.

1.7 Other related implementation plans

1.7.1.1 The Final EMP will be developed with consideration of the content and requirements of other relevant Implementation Plans. These are set out in **Table 1.1** below with details of the linkages.

Table 1.1 Other related implementation plans to the Final EMP

Implementation plan	Linkage with the EMP
Marine Mammal Mitigation Protocol	The Marine Mammal Mitigation Protocol will set out the approach to management and mitigation of potential impacts on marine mammals. The Outline EMP references the **Outline Marine Mammal Mitigation Plan**.
Marine Pollution Contingency Plan	The Final Marine Pollution Contingency Plan will align with the guidance will provide measures to be adopted to minimise the impacts from the release of pollutants from construction and O&M stages of the Project. The Outline Marine Pollution Contingency Plan is appended to this Outline EMP (see **Appendix 1**).
Vessel Management and Navigational Safety Plan	The Vessel Management and Navigational Safety Plan will ensure that the vessel operations are managed in such a way that disturbance effects on marine mammal and bird species are managed and mitigated where required. The Outline EMP references the **Outline Vessel Management and Navigational Safety Plan**.
Fisheries Mitigation, Monitoring and Communication Plan	The **Outline Fisheries Mitigation, Monitoring and Communication Plan** outlines communication protocols relating to commercial fishing activity. The Outline EMP references the **Outline Commercial Fisheries Monitoring, Management, Mitigation and Coexistence Strategy**.
Emergency Response Cooperation Plan	The Outline EMP references the Emergency Response Cooperation Plan, which will be produced post-consent.
Written Scheme of Investigation (Offshore)	The Written Scheme of Investigation (offshore) will outline the procedures to be followed on discovering and marine archaeology during the construction and O&M stage of the Project. The Outline EMP references the **Outline Written Scheme of Investigation (Offshore)**.
Project Environmental Monitoring Programme	The Project Environmental Monitoring Programme will set out the Applicant's commitments to monitoring the potential effects of the Project on key receptors. It will provide detail on how monitoring will be delivered across all stages of the Project (pre-construction, construction, O&M and decommissioning). The Outline EMP references the **Outline Project Environmental Monitoring Programme**.
Decommissioning Programme	The Applicant will be required to submit a Decommissioning Programme in accordance with section 105(2) of the Energy Act 2004. The Decommissioning Programme will be produced post-consent.
Lighting and Marking Plan	The Lighting and Marking Plan will set out the approach to mitigating navigational safety risk via the lighting and marking of offshore infrastructure. The Outline EMP references the **Outline Lighting and Marking Plan**.
Offshore Invasive Non-Native Species Management Plan	The Outline EMP provides the overarching framework for environment management during the construction and O&M stage of the Project. The **Outline Offshore Invasive Non-Native Species Management Plan** aims to secure specific measures to avoid, reduce or remedy likely significant effects associated with INNS.

2. Part 1: Implementation of the Environmental Management Plan

2.1 Roles and responsibilities

2.1.1 Overview

2.1.1.1 This part of the Final EMP will outline the principal roles and responsibilities of individuals involved in the construction and O&M of the Project, specifically in relation to environmental management. It will detail the key personnel onsite, clarify their environmental duties, and explain how their responsibilities align with others within the project team. This includes personnel such as the Project Director, the Quality, Health, Safety and Environment (QHSE) Manager, the Development Manager or Advisors, as well as specialist roles like the Environmental Liaison Officer, Fisheries Liaison Officer (FLO), and Archaeological experts where applicable. Contact information for these individuals will also be provided in the final version of the Offshore EMP.

2.1.1.2 All personnel employed by the Applicant, including contractors and subcontractors, will be required to adhere to the commitments and requirements set out in the Final Offshore EMP and its associated documents. While contractors may implement their own internal procedures, these must meet or exceed the standards and mitigation measures specified within the Offshore EMP.

2.1.1.3 A preliminary overview of the roles and associated responsibilities is presented in **Table 2.1**. These will be confirmed following Project consent and refined as needed throughout the different stages of the Project. Final definitions and agreement on these responsibilities will be agreed with MD-LOT prior to the start of construction works.

Table 2.1 Preliminary overview of the roles and responsibilities for the implementation and management of the EMP (further details of the role responsibilities will be expanded on in the Final EMP)

Role	Responsibility
Project Director	Ensures that the EMP is properly resourced and implemented across the Project lifecycle.
QHSE Manager	Manages all QHSE matters. Offers support and guidance, monitors performance, and strives to uphold QHSE standards throughout construction and O&M.
HSSE Lead	Serves as the main contact for contractors on daily HSE issues, conducts site inspections and audits, and coordinates emergency response with the Marine Coordinator. Responsible for developing the MarramWind HSSE Management System.
Offshore Development Manager	Oversees compliance with consent obligations and leads the preparation and execution of all associated plans, including the EMP.
Head of Construction	Directs construction efforts, ensuring that environmental protocols are upheld.

Role	Responsibility
Package Manager	Assists the Development Manager in implementing environmental measures within specific work areas or packages.
Marine Coordinator	Supervises marine vessel operations and manages communications with the fishing industry via notices and bulletins. Coordinates with FLOs for information sharing.
Independent Environmental Clerk of Works (ECoW)	Reviews and verifies environmental compliance plans, monitors adherence to consent conditions, offers advice, and delivers environmental training.
Contractor Environmental Advisor	Ensures that contractors meet environmental obligations during both construction and O&M stages.
Stakeholder Engagement Manager	Acts as the link between the Project and nearby communities and local authorities.
Archaeologist	Advises on archaeological considerations, ensuring relevant procedures are followed during construction and, if necessary, throughout O&M.
Marine Mammal Observer (if required)	Monitors and reports marine mammal activity during noise-generating operations such as piling, following the Marine Mammal Mitigation Protocol.
Company Fisheries Liaison Officer (CFLO)	Maintains engagement with commercial fisheries, shares Project information, and assists with the relocation of static fishing equipment when necessary. The CFLO can be based onshore visiting ports.
Offshore Fisheries Liaison Officer (OFLO)	Based at sea, this officer supports safe coordination between Project operations and fishing vessels, relaying information via the CFLO and other Project stakeholders.

2.1.2 Contact details

2.1.2.1 A MarramWind Contact Sheet will be compiled prior to the commencement of construction of the Project. This list will include contact details for the Applicant, as well as for contractors / subcontractors and other relevant third parties. This list will regularly be updated throughout the construction and O&M stages of the Project.

2.1.2.2 As a minimum, the MarramWind Contact Sheet will include the following information for each individual:

- company / organisation;
- role / position;
- name;
- telephone / mobile number;
- email address; and
- office location.

2.2 Leadership and commitment

2.2.1.1 To demonstrate and foster a culture of commitment to the MarramWind HSSE policy there will be:

- sufficient resources assigned to fulfil the requirements of the Final EMP and other related implementation plans;
- support provided by the Offshore Development Manager to other managers with environmental responsibilities;
- regular communication of Project environmental performance and promotion of contributing / offering improvement opportunities;
- sharing of environmental lessons learned across the Project;
- identification and management of environmental risks; and
- appropriate incident investigation and corrective action management.

2.2.1.2 Communications regarding environmental performance and knowledge sharing will be provided to the Project leadership and senior management teams as well as to the onsite Project delivery teams.

2.3 Environmental induction and training

2.3.1.1 All employees and contractors will receive an appropriate induction and training to ensure that they are aware of their environmental responsibilities and are competent to carry out the work. Environmental requirements will be explained to employees during the Project induction, on-going training via toolbox talks, briefings and notifications as required. Records will be made to demonstrate competence and training of employees; this includes maintaining copies of certificates in personnel files (in line with relevant data protection regulations such as General Data Protection Regulation requirements) and sign off sheets for toolbox talks and other awareness programmes. Records will be managed in line with data protection legislation.

2.3.1.2 The HSSE Induction will be integrated into the Project induction, and it shall be a requirement for all employees, Contractors and Subcontractors to complete it.

2.3.2 Project and environmental inductions

2.3.2.1 All employees, Contractors and Subcontractor must have a Project induction that includes an environmental component. Designated personnel the Contractor's team will be responsible for preparing and delivering the Project and environmental induction and maintaining documented attendee records.

2.3.2.2 It is expected that the environmental management contents of the Project and environmental inductions will include reference to compliance with relevant requirements and conditions; environmental management contacts; site-specific environmental sensitivities; waste management arrangements; hazardous material management; fuel, oil and chemical management; vessel safety inductions; environmental emergency response; reporting of incidents; and complaints.

2.4 Communication and stakeholder management

2.4.1.1 The offshore construction communications strategy for the Project is a fundamental component in MarramWind Limited's safety commitments / plan and has been built around the following fundamental principles:

- provision of relevant information to specific stakeholder groups during pre-construction and construction stages (for example: website, newsletter, local media, letter drops, meetings and social media); and
- provision of a freephone line, direct email and website contact form.

2.4.1.2 This will provide stakeholders with targeted access to information about the Project, including formal and informal opportunities to find out about the planning and development stage, and to provide feedback to MarramWind Limited, where related activities are likely to impact on stakeholders.

2.4.1.3 The broader community will be kept informed of the Project through the communication channels outlined in **paragraph 2.4.1.1**.

2.4.1.4 Notices and posters will be produced for ports, harbours and marinas, clubs and associations, fishers and vessel owners. These will be provided to made available in relevant locations that will be visible to stakeholders (for example, on notice boards and websites).

2.4.1.5 Stakeholders, including members of the public, will be able to contact MarramWind Limited by way of the direct email address, freephone or through the website contact form, which will be provided in the Final EMP.

2.4.1.6 All communication will be directed to, and managed by, the MarramWind Limited communications team.

2.4.2 Internal communication

2.4.2.1 To ensure that the environmental requirements of the Project are met, the Offshore Development Manager will act as a single point of contact between all internal stakeholders for all matters relating to environmental and consent issues respectively.

2.4.3 External communication (stakeholder and community)

2.4.3.1 The Offshore Development Manager in consultation with the Stakeholder Engagement Manager will ensure engagement occurs with all relevant stakeholders at appropriate times during the pre-construction and construction stages and effective dissemination of information to the identified points of contact.

2.4.3.2 Construction plans will be distributed to stakeholders for each Project phase or particular sea area, prior to construction, to offer advanced warning of works, in addition to continuing communications throughout each stage / area of construction.

2.4.3.3 Communication with commercial fisheries will be conducted in accordance with the **Volume 4: Outline Fisheries Mitigation, Monitoring and Communication Plan**. Throughout the pre-planning stage, the Applicant has maintained regular dialogue with fishing representatives bodies such as the Scottish Fishermen's Federation and the Scottish White Fish Producer's Association.

2.4.3.4 MarramWind Limited will appointment a CFLO who will communicate with fishers, vessel skippers and boat owners who may have an interest in the site.

2.4.3.5 MarramWind Limited will also appoint an OFLO who will be located offshore, on a guard vessel, throughout much of the offshore construction stage. The OFLO will be contactable by fishers, divers, charter vessels and other sea users, and will act as a project management point of contact for the construction base and for ports and marinas along the coast.

2.4.4 External communication (environmental regulatory agencies)

2.4.4.1 Consultation with a range of environmental or other regulatory agencies may be required throughout the construction and O&M of the Project. The Offshore Development Manager will engage and cooperate with all relevant regulatory agencies in meeting the environmental conditions as required under legal obligations and consents (as they become relevant).

2.5 Complaints and incident management

2.5.1 Complaints protocol

2.5.1.1 All MarramWind Limited employees, as well as its contractors and subcontractors must ensure that any complaints are reported to the designated members of the Project team and investigated promptly.

2.5.1.2 The Final EMP must detail the procedure in place to report public complaints in relation to offshore works.

2.5.1.3 Frequent contact will be maintained with the local community to provide effective feedback in regard to any actual or perceived environmental issues.

2.5.2 Environmental incident reporting

2.5.2.1 All incidents must be reported to the MarramWind Limited Project Director and HSSE Lead as soon as possible and no longer than 24 hours after the event occurred. High severity incidents (for instance, major pollution events) must be reported immediately.

2.5.2.2 For high severity events an incident review panel shall be conducted for robust learning. Attendees shall include the Project Director and HSSE Lead in call cases.

2.5.2.3 All incidents will be detailed in the Monthly Status Reports prepared for MarramWind Limited. The reporting will include:

- an overall HSSE performance update;
- details of incidents and associated level of significance (high, medium, or low);
- details of any near misses, unsafe or safe observations; and
- details of any injuries, material loss, or environmental damage.

3. Part 2: Environmental management and control measures

3.1 Environmental management systems and compliance

3.1.1.1 This Section will provide an overview of the controls and procedures to be adopted to mitigate the environmental impacts associated with the Project. Commitments stated in this EIA Report will be translated into an appropriate format, allowing their practical implementation by contractors and subcontractors. This follows the Institute of Environmental Management and Assessment (IEMA) (now called the Institute of Sustainability and Environmental Professionals) Practitioner guide (IEMA, 2008), which states the following:

"*The overall objective of an EMP is to provide a continuous link or 'bridge' between the design phase of the Proposed Development, conditions attached to consents, Proposed Development construction, and into the operational phase*".

3.1.1.2 The Final EMP is the primary delivery tool of the Project's environmental documentation and is linked to the wider MarramWind Environmental Management System (EMS).

3.1.1.3 The MarramWind EMS will guide the practical implementation of the commitments stated in this EIA Report. All contractors and subcontractors will have an MarramWind EMS appropriate to their scope of work.

3.1.1.4 The complete list of embedded environmental measures is provided in **Volume 3, Appendix 5.2**. This register documents all the embedded environmental measures as Project commitments relating to the various stages of the Project. It will be updated post-consent with any required consent conditions.

3.1.1.5 As the Commitments Register (see **Volume 3, Appendix 5.2**) is developed from the commitments made within this EIA Report and in compliance with consent conditions, adherence to the EMP and associated plans will ensure compliance with the consents awarded for the Project in relation to environmental considerations.

3.2 Management of key environmental aspects

3.2.1 Marine pollution contingency plan

3.2.1.1 The **Outline Marine Pollution Contingency Plan** is provided in **Appendix 1**. The Final Marine Pollution Contingency Plan will align with relevant guidance and will provide measures to be adopted to minimise the impacts from the release of pollutants throughout the stages of the Project.

3.2.2 Marine ecology

3.2.2.1 If a wildlife incident occurs due to activities related to the Project, such as harm to a marine mammal or discovery of deceased fish or bird, the incident must be promptly reported to the Applicant's Offshore Development Manager or Independent ECoW. At a minimum, the report should include details of the activity in progress and the weather conditions at the time and should be supported by relevant photographs where possible. The Offshore Development Manager or Independent ECoW will then liaise with relevant regulatory authority if required.

3.2.2.2 The approach to management and mitigation of potential impacts on marine mammals is provided in **Volume 4: Outline Marine Mammal Mitigation Protocol**.

3.2.3 Protected species licencing

3.2.3.1 Where such activities are likely to result in disturbance or injury to protected species, the Applicant will apply for the necessary European Protected Species licences or other relevant consents from MD-LOT and / or NatureScot prior to the commencement of works.

3.2.3.2 All contractors and subcontractors will be made aware of these requirements through induction and toolbox talks. Compliance with licence conditions will be monitored by the Applicant's Environmental Manager and the Independent ECoW and reported to MD-LOT as required.

3.2.4 INNS and biosecurity

3.2.4.1 An **Outline Invasive Non-Native Species Management Plan** has been developed and provided in **Volume 4**. It will include measures to be adopted for the management of INNS during the construction and O&M stages.

3.2.5 Marine archaeology and cultural heritage

3.2.5.1 The procedures to be followed on discovering any marine archaeological artefacts during the construction and O&M stages of the Project are set out in **Volume 4: Outline Written Scheme of Investigation (Offshore)**.

3.2.6 Other marine users

3.2.6.1 The approach to management and mitigation of potential impacts on other marine users is described in the following Outline Plans provided in **Volume 4**:

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

3.2.6.2 The Vessel Management and Navigational Safety Plan will optimise navigational safety and ensure that the vessel operations are managed in such a way that disturbance effects on marine mammal and bird species are controlled and mitigated where required.

3.2.6.3 The Vessel Management and Navigational Safety Plan must be referred to during the planning and undertaking of all marine vessel operations to ensure that the approved mitigation and management procedures are applied.

3.2.6.4 Some of the specific measures adopted by the plans in **paragraph 3.2.6.1** are:

- the adoption of safety zones;
- appropriate notification of activities to other marine users;
- a clear process of marine coordination of all vessels and vessel activity;
- appropriate marking and lighting of vessels;
- appropriate marking and lighting of the Project infrastructure; and

- vessel transit planning, including commercial fisheries relations and management of commercial fisheries interactions.

3.2.7 Emissions to air

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

3.2.8 Waste management

3.2.8.1 A Waste Management Plan will be developed to manage all waste generated during the construction and O&M stages of the Project (see M-121 of **Volume 3, Appendix 5.2**). The Waste Management Plan will follow the principles of the waste hierarchy (Department for Environment, Food & Rural Affairs (Defra), 2011), which consists of:

- prevention;
- re-use;
- recycle;
- other recovery; and
- disposal.

3.2.8.2 As a minimum, the Waste Management Plan will include:

- an assessment of anticipated waste streams and surplus materials;
- defined waste management goals specific to the Project;
- proposed strategies for waste prevention, re-use and recycling;
- procedures for handling, storing and transporting materials; and
- workforce training measures and a strategy for sharing the plan with relevant personnel.

3.2.8.3 If sedimentary material must be moved or relocated (for example, during seabed preparation or cable installation), it will be relocated to a nearby area with similar sediment characteristics within the Red Line Boundary. This approach ensures the material remains within the natural sediment transport system. All deposition of material will take place within pre-approved locations.

3.2.8.4 Details of contingency planning in the event of an accidental release of materials that could cause harm to the environment will be covered by the Marine Pollution Contingency Plan (see **Appendix 1**).

Wastewater discharges

3.2.8.5 Controls for any wastewater discharges (such as effluent discharges, ballast waters, bilge waters, and deck runoff) will be included in the Final EMP, in accordance with latest legislation, regulatory limits and good practice.

3.2.8.6 Monitoring records in relation to the disposal of foul water, bilge water or ballast water during the construction stage must be retained. The Final EMP will set out a procedure for the retention of monitoring records.

3.2.9 Oils, fuels, and chemical management

3.2.9.1 It is the responsibility of each contractor to adhere to consent requirements and have in place adequate controls for the delivery, storage and use of fuels, oils and chemicals on vessels and other materials as required. This includes checks that chemicals to be used comply with relevant regulations. MarramWind Limited will check these controls are in place during their inspections on site. The Final EMP will set out details for this procedure including how often checks will be conducted.

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

3.2.9.3 Where practical, the minimum standard is that the contractor must use products that biodegrade quickly to ensure impacts to the environment are minimized. If a non-biodegradable (or otherwise environmentally damaging) product is proposed for use, the contractor must provide justification for that product being used.

3.2.9.4 Within their work package specific EMPs, each Contractor must consider the transport, delivery, storage and handling of hazardous materials and in particular oils and fuels. Contractors shall ensure compliance with all applicable legal requirements, and best practice guidelines, for example (but not limited to):

- the Water Environment (Controlled Activities) (Scotland) Regulations 2011 (up to 3 nautical miles offshore);
- The Scottish Environment Protection Agency's CAR practical guide (SEPA, 2022);
- the Offshore Petroleum Activities (Oil Pollution Prevention and Control) Regulations 2005; and
- the IMO MARPOL Annex III International Maritime Dangerous Goods Code (IMO, 1978)).

3.2.9.5 As a minimum, Contractor's EMPs shall demonstrate:

- consideration of measures to minimise environmental impact throughout the selection, storage and use of hazardous material;
- identification of relevant legislation, standards and manufacturer requirements applicable to their works;
- procedures for storage handling, labelling and maintaining records of hazardous substances;
- provisions for spill prevention, containment and emergency response;
- assignment of responsibilities to trained personnel for the safe management of hazardous materials; and
- maintenance arrangements to minimise risks of leaks, spills or failures from plant equipment

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

3.2.9.7 An **Outline Marine Pollution Contingency Plan** is included in this Outline EMP as **Appendix 1**, as set out in M-033 of the **Volume 3, Appendix 5.2**.

3.2.9.8 The Final EMP will include a Chemical Risk Assessment to identify, evaluate and mitigate potential environmental and health risks associated with the use, storage and disposal of hazardous substances during O&M and decommissioning stages of the Project.

3.2.10 Unexploded ordnance

3.2.10.1 Pre-construction surveys will be carried out to identify any potential UXO hazards within the Red Line Boundary. If UXOs are detected, appropriate clearance or removal activities will be undertaken, along with adjustments to construction plans (such as micro-siting or cable re-routing) where necessary.

3.2.10.2 If an UXO is discovered following the completion of the initial survey and clearance process, the Applicant must be notified immediately through the appropriate communication channels.

3.2.11 Dropped objects

3.2.11.1 Any object dropped at sea that is considered a potential navigational hazard by the Applicant, its contractors, or subcontractors will be documented and reported to MD-LOT using the designated dropped objects reporting form (Scottish Government, 2024).

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5. Glossary of Terms and Abbreviations

5.1 Abbreviations

Acronym	Definition
CFLO	Company Fisheries Liaison Officer
COSHH	Control of Substances Hazardous to Health
Defra	Department for Environment, Food & Rural Affairs
ECoW	Environmental Clerck of Works
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
EMS	Environmental Management System
HSE	Health, Safety & Environment
HSSE	Health, Safety, Security & Environment
IEMA	Institute of Environmental Management and Assessment
IMO	International Maritime Organisation
INNS	Invasive Non-Native Species
km	kilometres
MD-LOT	Marine Directorate – Licensing Operations Team
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
NE7	North East 7
O&M	Operation and Maintenance
OFLO	Offshore Fisheries Liaison Officer
QHSE	Quality, Health, Safety and Environment
s.36	Section 36
SPR	ScottishPower Renewables
UXO	Unexploded Ordnance
WTG	Wind Turbine Generator

5.2 Glossary of terms

Term	Definition
Environmental Management System	A structured framework of policies, procedures, and practices that enables an organisation to manage its environmental responsibilities effectively.

Appendix 1
Outline Marine Pollution Contingency Plan

Environmental Impact Assessment Report Volume 4: Outline Environmental Management Plan (Offshore), Appendix 1: Outline Marine Pollution Prevention and Contingency Plan

MarramWind Offshore Wind Farm

December 2025

MarramWind

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Accepted by:	MarramWind Limited

Contents

1. Introduction

1.1 Overview

1.1.1.1 This Outline Marine Pollution Prevention Contingency Plan (MPPCP) has been prepared to accompany the Environmental Impact Assessment (EIA) Report and forms an Appendix to the **Outline Environmental Management Plan** (EMP). It sets out the proposed framework for preventing, responding to, and managing potential marine pollution incidents during all relevant stages of the MarramWind Offshore Wind Farm (hereafter referred to as 'the Project'). This document provides a high-level framework for marine pollution prevention and contingency planning. Detailed procedures, roles, and operational protocols will be developed post-consent as part of the Final MPPCP.

1.1.1.2 This Outline MPPCP relates to M-033 of **Volume 3, Appendix 5.2: Commitments Register**.

1.1.1.3 This Outline MPPCP is part of a suite of outline plans prepared for the Project at the point of submissions for the consents, marine licences and permissions noted above. With agreement from Marine Directorate – Licensing Operation Team (MD-LOT) during a Quarterly Project Update call held on 18 September 2025, a single set of outline plans has been prepared and submitted with these being relevant to each of the marine licence applications submitted for the Project. This approach avoids any duplications of plans across the multiple marine licence applications required for the generating station and transmission components of the Project.

1.2 Project background

1.2.1.1 MarramWind Offshore Wind Farm (hereafter referred to as 'the Project') is wholly owned by Scottish Power Renewables UK Limited (SPR). MarramWind Limited, a subsidiary of SPR, is the Applicant for the Project.

1.2.1.2 The Project is a proposed floating wind farm located in the North Sea, with a grid connection capacity of up to 3 gigawatts (GW). The location of the Project is determined by the Option Area Agreement (OAA), which is the spatial boundary of the Northeast 7 (NE7) Plan Option within which the electricity generating infrastructure will be located. The NE7 Plan Option is located north-east of Rattray Head on the Aberdeenshire coast in north-east Scotland, approximately 75 kilometres (km) at its nearest point to shore and 110km at its furthest point. An option to lease agreement for the Project within the NE7 Plan Option was signed in April 2022.

1.2.1.3 A summary of the Project is provided in **Volume 1, Chapter 1: Introduction** and a comprehensive description of the Project is provided in **Volume 1, Chapter 4: Project Description**.

1.2.1.4 This Outline MPPCP relates specifically to the prevention and management of marine pollution incidents arising from works in the marine environment. The Project's offshore infrastructure, located seaward of Mean High Water Springs (MHWS) is illustrated in Figure 1 of the **Outline Environmental Management Plan** for which this document sits as an appendix to, and includes the following:

- wind turbine generators (WTGs), including WTG floating units (platforms and station keeping system);
- array cables;
- subsea distribution centres (SDCs);

- subsea substations;
- offshore substations;
- reactive compensation platform(s) (RCPs) (if required); and
- offshore export cable corridor to connect the offshore infrastructure to the landfall(s).

1.2.1.5 The EIA Report accompanies applications for offshore consents, licences and permissions for the Project to (MD-LOT under Section 36 (s.36) of the Electricity Act 1989, the Marine (Scotland) Act 2010 and the Marine and Coastal Access Act 2009, for the offshore infrastructure seaward of MHWS.

1.2.1.6 The EIA Report also accompanies an application to Aberdeenshire Council for planning permission in principle consent under The Town and Country Planning (Scotland) Act 1997, for the onshore infrastructure landward Mean Low Water Springs (MLWS).

1.2.1.7 There are four sets of EIA regulations applicable to the Project: the Electricity Works (EIA) (Scotland) Regulations 2017 for offshore generating stations requiring s.36 consent; the Marine Works (EIA) (Scotland) Regulations 2017 and the Marine Works (EIA) Regulations 2007 for marine licence applications within Scottish territorial waters (0 to 12 nautical miles) and offshore waters (12 to 200 nautical miles) respectively; and the Town and Country Planning (EIA) (Scotland) Regulations 2017 for planning applications submitted to Aberdeenshire Council for onshore infrastructure located landward of MLWS.

1.3 Purpose of the Marine Pollution Prevention Contingency Plan

1.3.1.1 Marine pollution incidents, though typically rare during offshore renewable energy activities, can result in serious environmental harm if not managed appropriately. Pollution may arise from accidental release of fuels, oils, chemicals, or other harmful substances during the construction, operation and maintenance (O&M), or decommissioning of offshore infrastructure. Given the Project's scale and location in Scottish waters, it is essential to have appropriate contingency measures in place to prevent, control, and effectively respond to any marine pollution event.

1.3.1.2 This Outline MPPCP provides a high-level framework of procedures and responsibilities that will guide pollution preparedness and response across all marine stages of the Project. It outlines measures to minimise the risk of pollution events and ensure an effective and coordinated response in the event of an incident, whilst supporting compliance with the EIA Report, relevant marine licence conditions, and recognised best practice guidance.

1.3.1.3 The MPPCP will apply throughout construction, O&M, and decommissioning stages of the Project and outlines pollution prevention, response, and control expectations for the various roles involved across these stages. Where a pollution incident forms part of a wider emergency – such as a fire or explosion – this MPPCP will operate in coordination with the Project's Emergency Response Plan, which will be developed post-consent. This coordination will include compliance with measure M-045 in **Volume 3, Appendix 5.2** which ensures compliance with Maritime and Coastguard Agency (MCA) Marine Guidance Note (MGN) 654 (MCA, 2021) and its annexes, including the completion of a Search and Rescue Checklist. These requirements will be embedded in the Final MPPCP and Emergency Response Plan to support effective incident management and regulatory compliance. The MPPCP will be approved prior to construction by Scottish Ministers in accordance with s.36 and associated marine licences. This approach allows the plan to reflect evolving design features and implementation details. The Final MPPCP will incorporate detailed spill scenario matrices, response strategies, and contractor-specific controls, developed in collaboration with appointed contractors and in consultation with statutory authorities.

1.3.1.4 The broad objectives of the Outline MPPCP are as follows:

- To provide a structured response framework for preventing and managing marine pollution incidents during all offshore construction, O&M, and decommissioning works.
- To safeguard the marine environment by ensuring compliance with applicable legislation, policy, and best practice measures for managing marine pollution incidents.
- To define clear responsibilities and communication pathways to support timely reporting, escalation, and response to pollution events or near misses.
- To support environmental compliance auditing and ensure pollution preparedness remains aligned with evolving risks, regulatory expectations, and environmental performance throughout the Project lifecycle.
- To ensure adherence to the conditions of the Project's s. 36 consent and associated marine licences, where applicable to pollution prevention and control.

1.3.1.5 The MPPCP shall state the legislative requirements, current standards of practice and best practice measures that define the standard of construction, O&M, and decommissioning practice adhered to by the Contractors. However, adhering to MPPCP does not absolve the Applicant, its Contractors or Subcontractors from complying with legislation and bylaws relevant to their construction, O&M, and decommissioning activities.

1.3.1.6 This MPPCP has been prepared with consideration of feedback received through the Scoping Opinion (Scottish Government, 2023), statutory consultation, and broader stakeholder engagement. Throughout this process, it was highlighted that management plans must be sufficiently robust to function as embedded environmental measures, forming an integral part of impact mitigation.

1.4 Implementation of the Marine Pollution Prevention Contingency Plan

1.4.1.1 The MPPCP is in an iterative document that will evolve throughout the Project lifecycle and during refinement of the Project's detailed design process, procurement and construction. It will be updated as necessary to reflect changes in methodology, legislation, or best practice.

1.4.1.2 The content of this Outline MPPCP will be reviewed and refined in consultation with key regulatory bodies, including the MCA, MD-LOT, and the Scottish Environment Protection Agency (SEPA). A final version will be submitted for approval prior to the commencement of construction, ensuring it reflects the most current regulatory expectations and project-specific requirements.

1.4.1.3 To account for evolving project parameters, this MPPCP may be subject to updates. Revisions may be required in response to changes in construction methodologies, the emergence of new environmental information, updates to legislation or best practice guidance, or the need for enhanced pollution prevention measures. The process for managing such changes is outlined in **Appendix C**.

1.4.1.4 The MPPCP, approved by Scottish Ministers, will be incorporated into the contracts for Principal Contractors responsible for the works and will apply to all offshore activities and assets within the Offshore Red Line Boundary, including vessels operated by Principal Contractors, Subcontractors, and their suppliers. All parties involved, including Principal Contractors, Subcontractors and their suppliers, must comply with the relevant provisions of the detailed MPPCP. They are obligated to provide documentation outlining how they will guarantee both the implementation and monitoring of the MPPCP requirements throughout their respective scopes of work. Contractors must also define their own spill response

arrangements for operations outside the Project boundary, subject to oversight and approval by the Applicant.

1.5 Scope of Marine Pollution Prevention Contingency Plan

1.5.1.1 The MPPCP will cover the following:

- Marine Pollution Prevention Contingency Planning;
- Project Pollution and Risk Assessment;
- Project Procedure for Responding to Pollution Incidents;
- Legislation and Guidance;
- Operational Emergencies;
- Procedure for Management of Change; and
- Template for Project Site-Specific Spill Response Plan.

1.6 Other related implementation plans

1.6.1.1 The MPPCP will be developed with consideration of the content and requirements of other relevant Implementation Plans. These are set out in **Table 1.1** below with details of the linkages.

Table 1.1 Other related implementation plans to the MPPCP

Implementation plan	Linkage with MPPCP
Environmental Management Plan	Provides the overarching framework for environment management during the offshore construction and O&M. The MPPCP is appended to this document and aligns with its structure and commitments. **Outline Environmental Management Plan**.
Project Environmental Monitoring Programme (PEMP)	Sets out the Applicant's commitments to monitoring the potential effects of the Project on key receptors. It will provide detail on how monitoring will be delivered across all stages of the Project (pre-construction, construction, O&M and decommissioning). The Outline MPPCP aligns with **Outline Project Environmental Monitoring Programme**
Vessel Management and Navigational Safety Plan (VMNSP)	Sets out measures to manage vessel operations, minimise collision and allision risks, ensure safe navigation, and support pollution prevention. The Outline MPPCP references **Outline Vessel Management and Navigational Safety Plan.**
Marine Mammal Mitigation Plan (MMMP)	Provides mitigation measures for marine mammals that may be affected by pollution incidents. The Outline MPPCP will coordinate with MMMP where

Implementation plan	Linkage with MPPCP
	relevant. **Outline Marine Mammal Mitigation Plan** has been submitted with the Application.
Commercial Fisheries Monitoring, Management, Mitigation and Coexistence Strategy	Outlines communication protocols and mitigation measures for interactions with commercial fisheries. The Outline MPPCP will manage and coordinate pollution incidents affecting fisheries with this strategy. The **Outline Commercial Fisheries Monitoring, Management, Mitigation and Coexistence Strategy** has been submitted with the Application.
Outline Written Scheme of Investigation (WSI)	Sets out procedures for marine archaeology. The MPPCP will ensure pollution incidents do not compromise archaeological sites. The Outline MPPCP references the **Outline Written Scheme of Investigation**.
Emergency Response Cooperation Plan (ERCoP)	Will define coordination protocols for multi-hazard emergencies, including fire, collision, and pollution events. It supports compliance with MCA MGN 654 and will be appended to the Safety Zone Application. The MPPCP will operate in conjunction with the ERCoP during complex or escalated incidents
Outline Offshore Invasive Non-Native Species (INNS) Management Plan	Provides measures to prevent and manage INNS. Pollution incidents will be assessed for potential INNS risks (see **Outline Offshore Invasive Non-Native Species Management Plan**).
Outline Lighting and Marking Plan	Supports navigational safety and pollution prevention through appropriate marking of offshore infrastructure (see **Outline Lighting and Marking Plan**).
Decommissioning Programme	Will include pollution prevention and response measures during decommissioning. The MPPCP will be updated accordingly.

1.7 Roles and responsibilities

1.7.1.1 Roles and responsibilities for environmental management across the Project are comprehensively outlined in Table 2.1 of **Outline Environmental Management Plan**. To avoid duplication, this MPPCP cross-refers to the EMP and only introduces additional roles specific to marine pollution prevention and response. These roles will be confirmed following Project consent and refined as needed throughout the different stages of the Project. Final definitions and agreement on these responsibilities will be reached with MD-LOT prior to the start of construction works.

1.7.1.2 A preliminary overview of the roles and associated responsibilities in relation to the MPPCP is presented in **Table 1.2**. These will be confirmed following Project consent and refined as needed throughout the different stages of the Project. Final definitions and agreement on these responsibilities will be reached with MD-LOT prior to the start of construction works.

Table 1.2 Preliminary overview of the roles and responsibilities for the implementation of the MPPCP

Roles	Responsibility
Applicant's Environment Manager	Oversees environmental compliance across the Project. Supports implementation of the MPPCP, advises spill risk and response, and coordinates reporting to regulatory authorities.
Pollution Control Coordinator	Leads day-to-day implementation of the MPPCP. Oversees pollution preparedness, spill response readiness, training, and record keeping. Coordinates emergency responses and liaises with the Applicant and regulators.
Master of the Contractor's Vessel	Initiates the vessel's Shipboard Oil Pollution Emergency Plan (SOPEP), leads the immediate on-board response to spills, and reports incidents to His Majesty's (HM) Coastguard and the Project Marine Coordinator. Coordinates with the Contractor's Emergency Response Team (CERT) and spill responders as required.
Contractor's Emergency Response Team (CERT)	Provides 24/7 spill response support for the Contractor. Mobilises in emergencies, coordinates with the vessel Master and spill response subcontractor, and ensures response actions follow the Contractor's MPCP.
Spill response Subcontractor	Provides spill response equipment, trained personnel, and technical expertise. Supports the Contractor during Level 2 and 3 incidents and maintains 24/7 readiness as detailed in the Contractor's MPPCP.
Vessel operators	Responsible for implementing pollution prevention measures onboard vessels, including adherence to fuel handling procedures, waste management, and emergency spill protocols. Must maintain pollution control equipment and records.

2. Marine Pollution Prevention Contingency Planning

2.1 Interface with national and sector marine pollution emergency plans

2.1.1 Introduction

2.1.1.1 This Outline MPPCP aligns with the UK's National Contingency Plan (NCP) for Marine Pollution and relevant Scottish frameworks. It recognises the tiered response structure coordinated by the MCA, with support from the MD-LOT, the SEPA, and other statutory bodies.

2.1.1.2 The MPPCP will interface with the following plan types:

- SOPEPs;
- Port and Harbour Oil Spill Contingency Plans (OSCPs); and
- Contractor-specific Marine Pollution Contingency Plans.

2.1.1.3 Detailed coordination procedures and contact protocols will be developed post-consent and included in the Final MPPCP.

2.2 Emergency response overview

2.2.1.1 The Project will adopt a tiered response model see **Plate 2.1**:

- Tier 1 (Operator-led): Minor, site-specific incidents managed by the Project team.
- Tier 2 (Port-led): Larger incidents requiring support from Port Authorities and OSCPs.
- Tier 3 (MCA-led): Major incidents triggering national emergency response under the NCP.

2.2.1.2 All ports used during construction, O&M and decommissioning stages will have their own OSPCs, which take precedence over this MPPCP for any incident occurring within port limits. For incidents at sea, this MPPCP will guide the Project's response, coordinated with the UK NCP for Marine Pollution and any relevant regional pollution response arrangements.

2.2.1.3 The Final MPPCP will define escalation procedures, contact lists, and coordination protocols with statutory agencies and emergency responders.

2.3 Integration with national monitoring and surveillance

2.3.1.1 The Project will coordinate with national systems such as CleanSeaNet for satellite-based spill detection and the UK's Civil Contingencies Secretariat for strategic emergency management. Contractor plans and vessel SOPEPs will be aligned with this MPPCP and national legislation.

Plate 2.1 Conceptual overview of the three-tier response framework

3. Project Pollution and Risk Assessment

3.1 Pollution events in the context of the Project

3.1.1.1 Offshore wind farm developments such as the Project are more likely to encounter small-scale, operational spills (Tier 1), typically arising from vessel servicing, bunkering, or accidental discharge of oils or hydraulic fluids. While the probability of large-scale spills is considered low, worst-case scenarios—such as vessel collisions or impacts with wind turbines, offshore substation and RCP jacket foundations—could necessitate a Tier 2 or Tier 3 response.

3.1.1.2 The primary hydrocarbons associated with the Project are expected to be marine gasoil and potentially intermediate fuel oil, carried in limited quantities onboard construction and O&M vessels. Response planning will consider prevailing meteorological and oceanographic conditions in the Fladen and Moray Firth region and proximity to sensitive receptors.

3.1.1.3 The Project adopts a tiered response framework consistent with the UK NCP for Marine Pollution and international obligations under the International Convention on Oil Pollution Preparedness, Response and Co-operation 1990 (IMO, 1990). This structure supports proportionate and coordinated responses to pollution incidents across all stages of the Project.

3.2 Project pollution risk assessment

3.2.1.1 A preliminary pollution risk assessment has been undertaken to identify potential sources of marine pollution during construction and O&M. This includes consideration of credible spill scenarios and outlines mitigation measures designed to reduce pollution risk to as low as reasonably practicable.

3.2.1.2 This preliminary assessment is based on known operational activities and vessel types and will be refined during detailed design and contractor engagement. Updates will follow the change management process outlined in **Appendix C** and will be coordinated with the PEMP to ensure alignment with monitoring and reporting commitments.

3.2.1.3 The full risk assessment, including scenario-specific controls and response capabilities, will be developed and included in the Final MPPCP post-consent. It will be reviewed and updated as necessary to reflect changes in project methodology, regulatory requirements, and best practice guidance.

4. Project Procedure for Responding to Pollution Incidents

4.1 Introduction

4.1.1.1 This Outline MPPCP establishes the framework for responding to marine pollution incidents during all offshore phases of the Project. All actual or suspected spills—regardless of volume or origin—must be reported and managed in accordance with this plan and relevant contractor procedures. Site-specific spill response protocols will be developed post-consent and included in the Final MPPCP.

4.2 Response Overview and Notifications

4.2.1.1 In the event of a marine pollution incident, the Project will follow a structured response protocol aligned with the UK NCP. The response will be led by the relevant party depending on the source and location of the spill:

- Tier 1 (Operator-led): minor, site-specific spills within the Offshore Red Line Boundary will be managed by the wind farm operator and contractor teams.
- Tier 2 (Port-led): incidents affecting port waters will be managed under the relevant Port OSCP.
- Tier 3 (MCA-led): major incidents requiring national coordination will be escalated to the MCA via the local Marine Rescue Coordination Centre (MRCC).

4.2.1.2 For vessel-origin spills, the vessel Master will:

- notify HM Coastguard and the Project Marine Coordinator.
- submit a Pollution Report (POLREP) to the MRCC and the Project Marine Coordinator.
- activate the vessel's SOPEP.

4.2.1.3 The Contractor will:

- lead containment and clean-up operations.
- engage specialist spill response subcontractors if required.
- coordinate with the Project Marine Coordinator and Environment Manager.

4.2.1.4 The Project Marine Coordinator will:

- facilitate communication between all parties.
- ensure regulatory notifications are completed.
- support coordination with external agencies.

4.2.1.5 The Project Marine Coordinator will maintain a live incident log and ensure that all notifications are documented and escalated in accordance with the tiered response framework. Coordination with the ERCoP will ensure alignment with broader emergency protocols.

4.3 Data collection on the initial incident

4.3.1.1 Initial incident data will be collected by the vessel Master or site personnel and passed to the Project Marine Coordinator. This will include:

- time and location of the spill.
- source and type of pollutant.
- estimated volume and spread.
- immediate actions taken.

4.3.1.2 The Final MPPCP will include standardised templates for incident reporting, including POLREP forms and sampling protocols.

4.4 Escalation and strategy selection

4.4.1.1 The Project will use a tiered escalation guide to determine the appropriate response level. This will be based on:

- estimated spill volume.
- proximity to sensitive receptors.
- resource availability.
- regulatory thresholds.

4.4.1.2 Response strategies will be selected accordingly:

- Tier 1: use of onboard spill kits, containment booms, and contractor-led clean-up.
- Tier 2: co-ordination with Port Authorities and mobilisation of regional resources.
- Tier 3: MCA-led response with national assets and inter-agency coordination.

4.5 Dispersant Use and Regulatory Compliance

4.5.1.1 Dispersant application will only be considered under MCA and Marine Management Organisation (MMO) guidance (MMO, 2023a; 2023b; 2024 and 2025) and subject to SEPA approval. The Final MPPCP will include:

- dispersant approval protocols.
- emergency contact procedures.
- sampling and verification methods.

4.6 Coordination with Contractors and Subcontractors

4.6.1.1 All contractors must:

- maintain compliant MPPCPs and SOPEPs.
- train personnel in spill response procedures.
- ensure equipment is inspected and maintained.
- co-operate fully with the Applicant and statutory authorities during incidents.

4.7 Deferred Content for Final Marine Pollution Prevention Contingency Plan

4.7.1.1 The following elements will be developed post-consent and included in the Final MPPCP:

- POLREP templates and notification flowcharts.
- sampling and tracking protocols.
- environmental sensitivity scoring.
- tier selection matrices.
- dispersant application procedures.
- site-specific spill response plans.

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6. Glossary of Terms and Abbreviations

6.1 Abbreviations

Acronym	Definition
CERT	Contractor Emergency Response Team
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERCoP	Emergency Response Cooperation Plan
GW	gigawatts
HM	His Majesty's
INNS	Invasive Non-Native Species
km	kilometre
MCA	Maritime and Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MGN	Marine Guidance Note
MHWS	Mean High Water Springs
MLWS	Mean Low Water Springs
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MoU	Memoranda of Understanding
MPPCP	Marine Pollution Prevention and Contingency Plan
MRCC	Maritime Rescue Coordination Centre
NCP	UK National Contingency Plan
NE7	North East 7
O&M	Operation and Maintenance
OAA	Option Agreement Area
OSCP	Oil Spill Contingency Plan
PEMP	Project Environmental Monitoring Plan
POLREP	Pollution Report

Acronym	Definition
RCP	Reactive Compensation Platform
s.36	Section 36
SDC	Substation Distribution Centre
SOPEP	Shipboard Oil Pollution Emergency Plan
SPR	ScottishPower Renewables
UK	United Kingdom
VMNSP	Vessel Management and Navigational Safety Plan
WSI	Written Scheme of Investigation
WTG	Wind turbine Generator

6.2 Glossary of terms

Term	Definition
Bunkering	The process of supplying fuel (usually marine fuel oil) to a ship, typically carried out in port but may occur offshore under approved conditions.

Appendix A
Legislation and Guidance

[This Appendix will be developed in the final Marine Pollution Contingency Plan post-consent and will provide a comprehensive summary of applicable UK and Scottish legislation, international conventions, and best practice guidance relevant to marine pollution prevention and response. It will include references to statutory obligations under the Marine and Coastal Access Act 2009, the Merchant Shipping Regulations, and the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC 1990), among others].

Appendix B
Operational Emergencies

[This Appendix will be developed post-consent to outline a range of operational emergency scenarios that could result in marine pollution during construction, operation, and decommissioning. It will include scenario-based response strategies, escalation protocols, and coordination mechanisms aligned with the UK National Contingency Plan (NCP) and the Project's Emergency Response Cooperation Plan (ERCoP)].

Appendix C
Procedure for Management of Change

[This Appendix will be developed post-consent and will define the procedures for managing changes to the MPPCP. It will include triggers for review, approval pathways, and documentation requirements to ensure the plan remains current and effective throughout the Project lifecycle. The procedure will align with the Project's Environmental Management System (EMS) and regulatory expectations].

Appendix D
List of Indicative Contacts

[This Appendix will be developed post-consent and will contain a directory of key contacts including regulatory authorities, emergency responders, port authorities, spill response contractors, and internal Project personnel. The contact list will be maintained as a live document and updated regularly to support rapid communication during pollution incidents].

Appendix E
Template for Project Site-Specific Spill Response Plan

6.2.1.1 This Appendix will be developed post-consent and will provide a template for preparing site-specific spill response plans for offshore construction and O&M activities. It will include placeholders for vessel-specific procedures, equipment inventories, response team roles, and notification protocols. The template will be finalised in collaboration with contractors and vessel operators.

MarramWind