



# **XLINKS MOROCCO-UK POWER PROJECT**

## **Preliminary Environmental Information Report**

**Volume 1, Appendix 3.3: Outline Offshore Construction Environmental Management Plan (CEMP)**



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# 1 APPENDIX 3.3: OUTLINE OFFSHORE CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN

## 1.1 Introduction

- 1.1.1 This outline Offshore Construction Environmental Management Plan (outline CEMP) document has been prepared to support the Preliminary Environmental Information Report (PEIR) regarding the offshore elements (up to and including the landfall HDD) of the Xlinks Morocco-UK Power Project (the Proposed Development) within the UK jurisdiction.
- 1.1.2 A separate Outline Onshore Construction Environmental Management Plan is provided as Volume 1, Appendix 3.2 of the PEIR.
- 1.1.3 This outline CEMP sets out the framework for the final Offshore CEMP, including necessary mitigation measures to reduce or prevent potential effects upon the environment and nearby sensitive receptors during the construction phase of the development.
- 1.1.4 Preparation of the final Offshore CEMP will be the responsibility of the appointed Offshore Principal Contractor. The Offshore Principal Contractor is likely to have internal management system requirements (with regards e.g. pollution prevention), specific plant knowledge, and CEMP templates, so the final Offshore CEMP may vary from what is set out within this outline document.
- 1.1.5 This outline CEMP is based on industry good practice and relevant legislation (at the time of preparation). This outline CEMP constitutes the Applicant's minimum requirements, which will be required as part of the Principal Contractor procurement process.
- 1.1.6 The final Offshore CEMP will be agreed with the relevant host authority in advance of works starting. Once agreed, as a minimum, the final Offshore CEMP will be formally reviewed every four months by the Contractor's HSE team and within a week following a high potential environmental incident; and approved by the Applicant prior to reissue. Compliance with the Applicant's environmental management requirements will be audited as part of the Applicant's annual environmental audit programme.
- 1.1.7 This outline CEMP is considered draft at PEIR stage and will be updated throughout the EIA process, as relevant assessments and mitigation measures evolve. The outline CEMP will be finalised and submitted as part of the Development Consent Order (DCO) application, alongside the Environmental Statement (ES).

## 1.2 Scope of CEMP

- 1.2.1 The final CEMP will set out the controls and processes that are to be adopted by the Principal Contractor (including any sub-contractors or suppliers involved in the works) to mitigate environmental impacts throughout the offshore construction phase of the Proposed Development. The CEMP is considered to be an iterative

document that develops throughout the pre-construction and construction phases of a project. This outline CEMP represents the initial iteration of the plan.

### 1.2.2 The objectives of the final CEMP are to:

- Provide a mechanism for ensuring that measures to avoid, minimise or mitigate potentially adverse environmental impacts are implemented;
- Ensure that environmental best practices are adopted throughout the construction phase of the Project;
- Ensure a prompt response if any unacceptable adverse impacts are identified, with the provision of appropriate additional mitigation measures as required;
- Provide a means for mitigating impacts that may not be anticipated or become apparent until construction is underway;
- Provide assurance to consultees and other stakeholders that requirements with respect to environmental mitigation are being addressed;
- Provide a mechanism for compliance auditing to ensure mitigation measures are being effectively implemented and maintained during construction; and
- Implement a policy of waste control and minimisation that is aligned to the waste management hierarchy; and
- Enable full compliance to be maintained with all relevant legislation.

### 1.2.3 The CEMP includes the following, with outline content for each section described in this document:

- Project Description and Environmental Sensitivities (Section 1.3);
- Environmental Management Structure and Responsibilities (Section 1.4);
- Associated Documentation (Section 1.5);
- Management of Key Environmental Issues (Section 1.6);
- Environmental Incident Response (Section 1.7);
- Monitoring and Site Inspections (Section 1.8);
- Legislative and Regulatory Compliance (Section 1.9);
- Training and Awareness (Section 1.10);
- Communication and Reporting (Section 1.11);
- Sub-contractor Management (Section 1.12); and
- Sustainable Construction (Section 1.13).

### 1.2.4 Plans to be prepared by the Principal Contractor to accompany the final Offshore CEMP include the following:

- Emergency Spill Response Plan;
- Offshore Waste Management Plan;
- Marine Pollution Contingency Plan (MPCP);
- Shipboard Oil Pollution Emergency Plan (SOPEP);
- Dropped Objects Procedure;
- Vessel Management Plan (VMP);
- Biosecurity Risk Assessment; and

- Dredging / Sediment Disturbance Management Plan.

## 1.3 Project Description and Environmental Sensitivities

- 1.3.1 The PEIR outlines the offshore project description (Volume 1, Chapter 3) based on a design envelope. Following final design of the project and the associated EIA, this section of the Offshore CEMP will set out information with regards to the detailed design and the associated environmental sensitivities.
- 1.3.2 The final CEMP should duly summarise the results of the environmental impact assessment, listing in particular, sensitive ecological, archaeological or human receptors, such as protected habitats, protected wrecks, constraints from other infrastructure, site layout plans. The scope of works and the environmental mitigations afforded by the final CEMP should adequately provision for the levels of protection that are deemed necessary (by the final ES) to suitably minimise impacts on all sensitive receptors.
- 1.3.3 The Principal Contractor for the construction of the Offshore Project will be expected to have their own Aspect and Impacts Register as part of their Environmental Management System (EMS).

## 1.4 Environmental Management Structure and Responsibilities

- 1.4.1 Environmental Management roles and responsibilities for the Offshore Project are required to be documented. This section of the final offshore CEMP will set out the environmental responsibilities for the Offshore Project, including identification of key site staff, their environmental management responsibilities and how these link with other members of the project team, such as the Project Manager, the project Health and Safety / Environmental Manager(s) and / or Advisors and environmental specialists such as Environmental Liaison Officer, Fisheries Liaison Officer, or Archaeologists.
- 1.4.2 Interactions with stakeholders such as the Marine Management Organisation (MMO), Joint Nature Conservation Committee (JNCC), Natural England (NE), Environment Agency (EA) and the Local Planning Authority will also be covered in this section.
- 1.4.3 An organisational chart depicting the environmental management arrangements will be provided as a useful mechanism to illustrate the Offshore Project's environmental management structure. The contact details for the individuals listed will also be included in this section or attached as an appendix to the final offshore CEMP. At this stage it is anticipated that the Applicant will employ a Principal Contractor who will be responsible for managing Safety, Health, Environment and Quality (SHEQ) issues, including the preparation of associated environmental documentation. It is assumed that the Proposed Development (offshore) will be a notifiable project for the purposes of the Construction (Design and Management) Regulations 2015 (CDM regulations). The aim of the CDM Regulations is to improve health and safety for all personnel and roles in the construction sector.
- 1.4.4 The final offshore CEMP will require compliance with the CDM regulations and will require that all personnel involved in the construction process follow their relevant

SHE standards and risk management procedures. (The requirements of the final CEMP will be considered inherent to the Principal Contractors SHE requirements when working on the Proposed Development.)

## 1.5 Associated Documentation

1.5.1 This section will refer to relevant associated EMS and project / site specific documentation that is required to be taken into consideration in developing the Offshore CEMP. Examples include, but are not limited to:

- Contract requirements (such as environmental standards; as outlined in e.g. the final ES);
- Principal Contractor's EMS requirements;
- Project Emergency Response Plan;
- Project Health and Safety Plan;
- Project Environmental Statement;
- Project Environmental Monitoring Plan / Programme (PEMP);
- Development Consent Order / Marine Licence conditions;
- Risk registers; and
- Legal registers.

## 1.6 Management of Key Environmental Issues

1.6.1 This section will set out details of the controls and procedures to be adopted to mitigate the environmental impacts associated with the Proposed Development.

1.6.2 It is anticipated that the final offshore CEMP will cover the following issues:

- Noise and vibration;
- Management of sediment disturbance;
- Marine ecology;
- Marine invasive species;
- Marine archaeology and cultural heritage;
- Dropped object(s) in the marine environment;
- Marine pollution prevention;
- Waste management;
- Vessel management;
- Emissions to air; and
- Method Statements and Risk Assessments.

1.6.3 The controls and procedures associated with the topics above will be focused on the offshore environment, as per the following summary sections. An outline onshore CEMP is presented as PEIR Volume 1, Appendix 3.2.

1.6.4 A brief overview of some of the key issues for each item is provided below. However, it must be noted that the list of issues identified above is not exhaustive and will be specific to the final design of the Offshore Project. Furthermore, the

key issues will be re-examined following the DCO determination period. The final offshore CEMP will include the mitigation measures to be adopted during construction.

### Noise and Vibration

- 1.6.5 There is the potential for noise and vibration to be generated during the construction process. Measures may be required to be implemented on site to minimise any effects, together with a programme of monitoring.
- 1.6.6 The Proposed Development ES will identify receptors that are potentially sensitive to noise and vibration impacts together with mitigation measures (where required), which must be implemented.
- 1.6.7 Mitigation measures will include implementation of a Vessel Management Plan (VMP) which will dictate the rules for appropriate vessel movements, including transit routes and speeds.
- 1.6.8 The final CEMP will also include commitment to undertake any post-consent activities that may have potential for noise and vibration impacts, in an appropriate and responsible manner (e.g. adhering to Joint Nature Conservation Committee (JNCC) guidelines for minimising the risk of injury to marine mammals). Post-consent activities with potential for noise and vibration impacts include pre-construction, contractor led geophysical surveys, and also Unexploded Ordnance (UXO) removal (if required).
- 1.6.9 Note, marine licence applications would be made for any targeted unexploded ordnance (UXO) geophysical survey, and separately for any resultant UXO removal/detonation. Any UXO investigation and clearance works would be undertaken ahead of the main construction activities and thus, may be addressed separately (in advance and by separate contractors) to the final CEMP.
- 1.6.10 A Project Environmental Monitoring Plan will be prepared, as required, setting out requirements and responsibilities and may include noise and vibration monitoring.

### Dredging / Management of sediment disturbance

- 1.6.11 Localised dredging may be required for seabed preparation at the HDD exit points. At the time of drafting the PEIR, the final methods are to be confirmed, however this is the only location where the potential for dredged 'arisings' have been identified. A Dredging Management Plan will be developed to limit seabed disturbance and suspended sediment concentrations and control the generation of sediment plumes.
- 1.6.12 Appropriate dredging / clearance plant will be identified for the extent and volume of material to be dredged but it is considered that a Trailing Suction Hopper Dredger (TSHD), back-hoe dredger, or MFE are the most likely construction methods in this regard.
- 1.6.13 Disposal options for the dredged material (where arisings occur) will be considered as the design evolves with beneficial re-use of dredged material the preferred option. Where this is not possible, alternative disposal options in line with regulatory and consenting requirements for disposal of dredged material will be adhered to.
- 1.6.14 Elsewhere, cable lay activities, including mechanical trenching are likely to disturb sediments. The final offshore CEMP should set out deployment guidelines (e.g.

maximum trenching speeds) designed to minimise sediment disturbance where possible.

## Marine Ecology

- 1.6.15 The ES will identify areas of conservation / protection and sensitivities associated with e.g. benthic ecology, fisheries and marine mammal receptors, and will set out measures for avoiding or minimising potential for impact as appropriate. The final offshore CEMP will include any mitigation measures to be adopted. This will enable communication of awareness of any sensitive areas and potentially sensitive features to the project team. The procedures to be adopted in the event of an incident in proximity to these features will also be set out in the final offshore CEMP.
- 1.6.16 Where the cable cannot be fully buried, including at cable crossings, cable protection in the form of a rock berm or concrete mattresses will be required. The placement of such cable protection can result in the change or loss of seabed habitat and long-term change to a new seabed type. The requirement for such protection measures will be carefully planned and mapped out to minimise the area of seabed affected at each location and protection measures will only be deployed where considered necessary for the safe operation of the Proposed Development and other marine users. Specific measures to ensure the accurate deployment of cable protection measures to minimise loss of seabed habitat will be implemented through the final offshore CEMP.

## Marine Invasive Species

- 1.6.17 Measures to prevent the introduction and spread of marine invasive non-native species (INNS) will be implemented through the final offshore CEMP and associated Biosecurity Plan.
- 1.6.18 A Biosecurity Risk Assessment will be undertaken to identify potential pathways of introduction, and critical control points for preventing the spread of marine INNS.
- 1.6.19 All project vessels will operate in compliance with the International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention).

## Marine Archaeology and Cultural Heritage

- 1.6.20 The ES will identify sites of potential archaeological importance. Archaeological Exclusion Zones of at least 50 m will be implemented during construction around known sites of archaeological significance.
- 1.6.21 Additional unknown or unexpected cultural heritage and marine heritage receptors identified during construction will be reported utilising the project specific Protocol for Archaeological Discoveries (PAD), which will form part of the final Offshore CEMP.
- 1.6.22 The final offshore CEMP will reference the Proposed Development's Written Scheme of Investigation (WSI), which will outline e.g. the protocols to be followed on reporting and recording should archaeological features be identified during construction.



- 1.6.23 Micro-routing of the cable will be undertaken where possible and archaeological exclusion zones applied to avoid direct impacts on cultural heritage assets identified during construction. All other measures and protocols required by the Proposed Development's WSI will be referenced in this section as appropriate. At PEIR stage an outline WSI is provided as Volume 3, Appendix 7.2.

### Dropped Object(s) in the Marine Environment

- 1.6.24 Objects dropped overboard during construction activities can pose a significant hazard to the marine environment and other marine users. The potential for objects to be dropped or otherwise accidentally deposited will be minimised as far as reasonably practicable.
- 1.6.25 A dropped objects procedure will be developed by the Contractor within the final offshore CEMP, detailing the requirements and procedures for vessel operators to identify, record, notify the MMO and, where possible, recover dropped objects.

### Marine Pollution Prevention

- 1.6.26 The final offshore CEMP will include the following plans to limit the potential for pollution incidents:
- Emergency Spill Response Plan;
  - Waste Management Plan;
  - MPCP; and a
  - SOPEP.
- 1.6.27 All project vessels will have control measures and shipboard plans in place. In addition, project vessels will be compliant with the requirements of the following international agreements:
- International Convention for the Prevention of Pollution from Ships (MARPOL Convention);
  - International Regulations for the Prevention of Collisions at Sea (COLREGS);
  - International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention).
- 1.6.28 Drilling fluids required for HDD operations will be carefully managed to minimise the risk of unplanned breakouts into the marine environment. The use of best practice drilling fluids such as bentonite (OSPAR PLONOR list substance) will be prioritised.
- 1.6.29 All hazardous materials will be required to be stored and managed in accordance with best practice guidance.

### Waste Management

- 1.6.30 Prior to cable installation, a pre-lay grapnel run may be required along portions of the Offshore Cable Corridor to clear the seabed of debris. Debris will be retrieved onboard the vessel for later onshore disposal.
- 1.6.31 In the case of marked abandoned, lost or discarded fishing gear (ALDFG), these will be returned to the MMO / relevant Inshore Fisheries and Conservation Authority (IFCA) for return to the owner of the marked gear. Unmarked gear and

other debris retrieved on deck will be disposed of onshore at appropriate disposal facilities.

- 1.6.32 At out of service (OOS) cable crossings, a section of the OOS cable will be cut and removed. The cut section will be recovered onboard the vessel and transported ashore for disposal at an appropriate onshore facility.
- 1.6.33 The majority of HDD drill arisings and used fluid from HDD will be collected and disposed of responsibly from the landward drill entry site. It should be noted that a small volume of drill fluid will be lost when the HDD breaks through the seabed. As above, drill fluids such as bentonite (OSPAR PLONOR list substance) will be utilised.
- 1.6.34 The above measures will be confirmed and implemented via the final offshore CEMP and an embedded Offshore Waste Management Plan.
- 1.6.35 It is also noted that under the MARPOL Convention vessels are required to prevent pollution and the discharge of sewage and garbage at sea.

## Vessel Management

- 1.6.36 The installation of the cables during the construction phase will require various vessels including:
- pre installation survey vessels;
  - workboats/tugs;
  - cable laying vessels (CLVs);
  - guard vessels;
  - trenching support vessels;
  - rock placement vessels; and
  - jack up vessels.
- 1.6.37 To ensure the safe navigation and operation of project vessels and the safety of other marine users, the following plans will be developed as part of the final offshore CEMP:
- VMP;
  - Navigation Safety Plan; and a
  - Lighting and Marking Plan.
- 1.6.38 The above plans (which may be combined within an overarching VMP) will identify measures to be implemented through the final offshore CEMP including, but not limited to:
- The implementation of safe passage zones - passing vessels will be requested to maintain a “safe” distance from installation vessels restricted in manoeuvrability. This will be monitored by guard vessels that will alert third-party vessels to the presence of the installation activity and provide support in the event of an emergency.
  - Appropriate notification of activities to other marine users - advance warning and accurate location details of construction operations, associated safety / clearance zones and advisory passing distances will be given via Notices to Mariners (NtMs), supported by Radio Navigational Warnings, Navigational

Telex (NAVTEX) and / or broadcast warnings as appropriate. Details will be set out in the VMP.

- A clear process of marine coordination of all project vessels and vessel activity including vessel transit planning - the appointed company Fisheries Liaison Officer (FLO) will support ongoing liaison and ensure clear communication between the Applicant and commercial fisheries during the construction phase. Good practice guidance on the approach to fisheries liaison and mitigation shall be implemented. A procedure for the claim of loss of fixed fishing gear deployment potential will be developed (outside of the scope of the offshore CEMP).
- Appropriate marking and lighting of vessels - cable installation vessels and support vessels will display appropriate lights and marks at all times, and where possible, broadcast their status on Automatic Identification Systems (AIS). This will include indication of the nature of the work in progress and highlight their restricted manoeuvrability.

- 1.6.39 Project vessels and third-party vessels will be compliant with international legislation during construction, including the International Regulations for Preventing Collisions at Sea (COLREGs) and the International Convention for the Safety of Life at Sea (SOLAS).
- 1.6.40 Where vessel anchoring is required, designated anchoring areas and protocols will be employed during offshore construction activities to minimise physical disturbance of the seabed.

## Emissions to Air

- 1.6.41 For offshore construction, vessel emissions must comply with MARPOL Annex VI requirements in relation to ozone depleting substances regulations, nitrogen oxide, sulphur oxide and particulate and volatile organic compounds. Where relevant, vessels shall have a valid International Air Pollution Prevention (IAPP) certificate.

## Method Statements and Risk Assessments

- 1.6.42 It is the responsibility of the Principal Contractor to have in place approved method statements and risk assessments for works being carried out on-site. Where relevant, the method statement will cross reference applicable environmental risk assessments. The risk assessments will identify environmental hazards and outline subsequent control measures. Control measures will be developed, implemented and monitored to ensure that any impact on the environment is avoided or minimised. Approval for these method statements with the relevant authorities may be required.
- 1.6.43 Key personnel involved in the work activities will be given a method statement briefing by the Principal Contractor or Contractor, e.g. in the form of a toolbox talk (TBT); **Section 1.10**.

## 1.7 Environmental Incident Response

- 1.7.1 It is essential that any environmental incidents (including dropped objects into the marine environment) are reported and managed correctly to allow their impact to be reduced to a minimum and to decrease the risk of the incident re-occurring. All

reporting will be undertaken as stated in Health, Safety, Environmental and Quality (HSEQ) minimum requirements documentation.

### Emergency response plan

- 1.7.2 Principal Contractors will be required to have an environmental emergency response plan. This will be in addition to individual management plans already in place for day-to-day operations. The plan will include a response flow chart and detail how to report and respond to an environmental incident, including the measures available to contain / clean up an incident (e.g. spill recovery or dispersal actions), manage dropped objects in the marine environment and offsite emergency response resources.
- 1.7.3 Vessels working on behalf of the Proposed Development will be required to have a SOPEP in accordance with International Maritime Organization (IMO) and Maritime and Coastguard Agency (MCA) guidelines or an Oil Pollution Plan if under 400GT.

### Reporting of Environmental Incidents

- 1.7.4 All environmental incidents (including dropped objects into the marine environment) and near misses must be reported, investigated and recorded to the project Team and the Health and Safety Executive.
- 1.7.5 Principal Contractors are required to produce monthly reports for the project Team to record health, safety and environment performance.

### Lessons Learned / Incident Follow-up

- 1.7.6 If an environmental incident were to occur, it will be thoroughly investigated by the relevant Principal Contractor to establish the root cause and prevent any recurrence. Dependent on the severity of the incident, the Project team may wish to manage or assist with the investigation process.

## 1.8 Monitoring and Site Inspections

- 1.8.1 The establishment of a programme of performance and compliance monitoring will be established for the offshore Project and documented in the final offshore CEMP (which should be considered a live document).

### Site / Vessel Inspections

- 1.8.2 The Principal Contractor, or appointed delegate, will undertake site inspections on at least a weekly basis. These site inspections will include an environmental component which will, as a minimum and where relevant, cover the key issues outlined within this document. Weekly inspections will be complimented by a combination of daily/monthly inspections, to be established as routine good practice.
- 1.8.3 The Principal Contractor is responsible for ensuring the close out of any actions identified during the inspections. Records of the inspections carried out will be retained onsite/onboard by the Principal Contractor and a copy provided to the Applicant; any remedial actions required must also be recorded.

- 1.8.4 Vessel inspections will be based on the International Marine Contractors Association (IMCA) standards, IMCA M 189/S 004 (Marine Inspection Check List for Small Boats) or IMCA M 149 (Common Marine Inspection Document). A log of all vessel audits and associated close out actions will be maintained.

### Environmental Audits

- 1.8.5 Environmental audits will comprise both internal and external audits.
- 1.8.6 The Applicant's audit programme includes a requirement to audit construction sites on a periodic basis. An audit checklist will be used by the Applicant to ensure that a standard approach is applied consistently. The Applicant's environmental audits are carried out by experienced auditors, either from within the Applicant's environmental team, or via delegated specialists.
- 1.8.7 All actions raised from the Applicant's audits will be logged within a central system. Progress of audit actions will be tracked, and a closing date assigned when the action is complete.

### Environmental Monitoring

- 1.8.8 A programme of environmental monitoring such as for water quality, noise, vibration, archaeology, vessels, scour, and ecological surveys may be required as part of consent conditions. This will be recorded within the PEMP, which may be appended to, or in some cases, combined with the final offshore CEMP. In any event, it is recognised that effective construction phase environmental management and environmental monitoring are inherently linked.
- 1.8.9 Where appropriate, the scope of monitoring shall be agreed prior to construction with the appropriate authority.

## 1.9 Legislative and Regulatory Compliance

- 1.9.1 The proposed development will be consented by the UK government (Secretary of State) via a Development Consent Order (DCO) issued by the Planning Inspectorate. The DCO determination process will include consultation with statutory agencies, including the Marine Management Organisation (MMO) and the Environment Agency. Some licences may be 'deemed' as part of the approved DCO.
- 1.9.2 Specific limits for e.g. discharges to the marine environment and working practices (such as seasonal exclusions) would be contained within the DCO and may not be breached at any time. The DCO and the deemed marine licence (DML) will be the key permissions to be adhered to for the offshore elements of the Proposed Development.
- 1.9.3 The Principal Contractor must ensure that all relevant planning conditions for the offshore Proposed Development are complied with. Planning (DCO) conditions will be reviewed by the Project team on a periodic basis to ensure that the conditions are being complied with.
- 1.9.4 Key reference material in this section of the final offshore CEMP will include the following:
- Register of relevant DCO Planning Consent / DML / Permit Conditions;

- Project Legal Register; and
- Good Practice Guidance / Industry Standards such as Pollution Prevention Guidance Notes.

### Legal Register

- 1.9.5 It is the Applicant's policy to minimise the impact of its construction activities on the environment by complying with all relevant environmental legislation and good practice. To ensure that the Applicant maintains awareness of the requirements of current environmental legislation and good practice, an Environmental and Planning Legal Register will be maintained by the Applicant's Environmental Team.
- 1.9.6 The Legal Register details relevant requirements regarding environmental legislation and guidelines for the business and includes details of associated control measures.
- 1.9.7 The Principal Contractor will be required to ensure that all relevant environmental legislation and good practice are complied with on site. Adequate records of environmental information and audits to demonstrate compliance with both legal and Project environmental requirements, will be required to be maintained by the Principal Contractor.
- 1.9.8 The Principal Contractor will be responsible for applying for and obtaining any permits / licenses related to their activities.
- 1.9.9 The Applicant will assess compliance with relevant environmental legislation as part of the Applicant's environmental audit programme.

## 1.10 Training and Awareness

- 1.10.1 A range of mechanisms are used for training and raising awareness of project environmental issues; these include environmental inductions, toolbox talks (TBTs), environmental notice boards (may be virtual), and environmental bulletins and alerts.
- 1.10.2 The Principal Contractor must ensure that all staff including any sub-Contractors are trained in the offshore Proposed Development's environmental emergency response procedures, so that they are able and prepared to respond to an incident promptly and effectively on-site. Where appropriate, the Applicant may request environmental emergency response plans to be tested on-site by the Principal Contractor. All vessels will carry relevant plans (e.g. MPCP) on board in hard copy.

### Site / Vessel Inductions

- 1.10.3 All site personnel will be required to have a site / vessel induction that includes an environmental component. Designated on-site / vessel personnel from the Principal Contractor's Project team will be responsible for preparing and delivering the site / vessel induction and maintaining documented attendee records.
- 1.10.4 It is expected that the environmental management contents of site / vessel inductions will include reference to compliance with:
- relevant planning / license conditions;

- environmental management contacts;
- site specific environmental sensitivities;
- waste management arrangements;
- water and wastewater management;
- hazardous material management;
- fuel, oil and chemical management;
- environmental emergency response; and
- reporting of incidents and complaints.

### Toolbox Talks (TBTs)

- 1.10.5 TBTs are an effective method for the dissemination of information relating to work activities. Environmental TBTs will be required to be delivered by the Principal Contractor to on-site / vessel personnel as required. Toolbox talks are an opportunity for the Principal Contractor to disclose any other environmental sensitivities that the sub-Contractors must be aware of.
- 1.10.6 It is the responsibility of the Principal Contractor to ensure that all personnel attending the TBT have signed a TBT attendance sheet; TBT attendance sheets are likely to be inspected as part of environmental audits.
- 1.10.7 Daily check-in / vessel TBTs can be held via video conference where appropriate.

### Environmental Notice Board

- 1.10.8 It is a requirement of the Applicant that all construction sites / vessels have an environmental notice board. The notice board must be displayed in an appropriate and prominent location and must be used to display copies of relevant environmental management information, including but not limited to the following:
- Environmental Policies;
  - Key Contacts Details, including Principal Contractor's Environmental Management Representative;
  - Environmental Bulletins;
  - Offshore Project Location Plan showing ecologically / archaeologically sensitive areas, key management areas and location of contingency materials / features;
  - Emergency Response Contact Details; and
  - Emergency Response Flowchart.

## 1.11 Communication and Reporting

### Meetings

- 1.11.1 Periodic HSE meetings are required to be held on all construction sites, including principal vessels (e.g. CLVs), and are likely to comprise representatives from the Applicant's project team, the Principal Contractor, and key sub-Contractors;

meeting attendees may attend remotely (via teleconference). Minutes of meetings will be recorded, and standard agenda items will include status of outstanding items, reports of environmental incidents or complaints, stakeholder engagement, TBTs issued / delivered, and key findings of environmental inspections and audits. All reporting will be undertaken as stated in Health, Safety, Environmental and Quality minimum requirements documentation.

- 1.11.2 The Principal Contractor is required to convene regular project team meetings to convey environmental information to the project team, including sub-Contractors and to raise awareness of environmental issues.

### Community Liaison and Complaints

- 1.11.3 The Applicant values its relationship with the communities that surround the offshore Proposed Development. All work shall be carefully planned to minimise disturbance to the local communities.
- 1.11.4 Depending on the results of community consultation undertaken as part of the EIA process, a public / community relations plan may be developed for the site by the Principal Contractor; given the remote nature of the offshore proposed development, this requirement may not be required. The purpose of the plan, which must be developed in liaison with the Project team, will set out the approach to community liaison for the duration of the proposed development. Fishery Liaison and Environment Liaison Officers will be appointed for the duration of the works, as required.
- 1.11.5 The Principal Contractor must ensure that any complaints are reported to the Project team and investigated promptly. Within their environmental management plan, the Principal Contractor must have a procedure in place to report public complaints.

### Stakeholders

- 1.11.6 Reference will be made within the final offshore CEMP to any reporting requirements in relation to stakeholders set out under the DCO consent (and DML).

## 1.12 Sub-contractor Management

- 1.12.1 The PEMP and final offshore CEMP will set out how the Principal Contractor manages their sub-Contractors onsite. This may range from the selection and assessment processes through to the assessment of performance on site.
- 1.12.2 For example, expectations of Principal Contractors working on behalf of the Applicant should be detailed in this and the following documents:
- Contract Schedules including specific environmental requirements;
  - Environmental Policy; and
  - Project Environmental Statement.



## 1.13 Sustainable Construction

- 1.13.1 During the design phase, sustainable construction will be considered when planning out the construction phase of the Offshore Project.
- 1.13.2 For guidance, “Sustainable Construction”, is described by the Institute of Environmental Management and Assessment as:

*“Application of sustainable development to the construction industry, whereby the construction and management of a development is based on principles of resource efficiency and the protection / enhancement of natural and built heritage. Sustainable construction comprises such matters as site planning and design, material selection, resource and energy use, recycling, and waste minimisation”.* (Institute of Environmental Management and Assessment, 2008).

## 1.14 Next steps

- 1.14.1 This outline CEMP document sets out the framework for the final Offshore CEMP, including necessary mitigation measures to reduce or prevent potential effects upon the environment and nearby sensitive receptors during the construction phase of the development.
- 1.14.2 This outline CEMP is based on industry good practice and relevant legislation (at the time of preparation). This outline CEMP is considered draft at PEIR stage and will be updated throughout the EIA process, as relevant assessments and mitigation measures evolve. The outline CEMP will be finalised and submitted as part of the Development Consent Order (DCO) application, alongside the Environmental Statement (ES).
- 1.14.3 The outline CEMP constitutes the Applicant’s minimum requirements and expectations for construction environmental management, and it will be used as an active determinant of the Principal Contractor procurement process.
- 1.14.4 Preparation of the final Offshore CEMP will be the responsibility of the appointed Offshore Principal Contractor. The final Offshore CEMP will be agreed with the relevant host authority in advance of works starting. The final Offshore CEMP will remain a live document and will be used as a framework for environmental audits and inspections throughout the construction phase.