REPORT

Boston Alternative Energy Facility

Outline Marine Mammal Mitigation Protocol

Client: Alternative Use Boston Projects Ltd.

Planning Inspectorate EN010095

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Table of Contents

Acro	nyms	1
1	Purpose of This Report	1
2	Summary of Potential Impacts to Marine Mammals	1
3	Marine Mammal Mitigation Measures	5
3.1	Piling	5
3.2	Mitigation Protocol for Piling	5
3.3	Vessels	7
4	Mitigation Protocols	12
5	References	20

Table of Tables

Table 2-1 Summary of underwater noise assessments (PTS) and vessel collision risk for marine mammals (harbour seal only)

Table of Plates

19 October 2021

Plate 4-1 Direction of approach to any marine mammal to be avoided (taken from SNH, 2017b)

10





Mitigation Protocols

Box 1 Mitigation Protocol for Piling	13
Box 2 Best Practice Measures for Vessels	14
Box 3 Reporting of Marine Mammal Strandings	16
Box 4 Marine Mammal Collision Reporting Form	17
Box 5 Stranded or Deceased Marine Mammal Reporting Form	18

19 October 2021

PB6934-ZZ-XX-RP-Z-4030





Acronyms

BDMLR	British Divers Marine Life Rescue
CSIP	Cetacean Stranding's Investigation Programme
dB re 1 μPa	Decibel level in water (decibels per 1 micro pascal)
DCO	Development Consent Order
DML	Deemed Marine Licence
EIA	Environmental Impact Assessment
JNCC	Joint Nature and Conservation Committee
km	Kilometre
km ²	Square Kilometres
m	Metre
m/s	Metre per second
ММО	Marine Management Organisation
MMObs	Marine Mammal Observer
МММР	Marine Mammal Mitigation Protocol
MU	Management Unit
NMP	Navigation Management Plan
PAM	Passive Acoustic Monitoring
PAM-Op	Passive Acoustic Monitoring Operator
PTS	Permanent Threshold Shift
scos	Special Committee on Seals
SEL	Sound Exposure Level
SELcum	Sound Exposure Level (cumulative)
SELss	Sound Exposure Level (single strike)
SNH	Scottish Natural Heritage (now NatureScot)
SPL _{peak}	Sound Pressure Level (peak)

19 October 2021





1 Purpose of This Report

- 1.1.1 This Outline Marine Mammal Mitigation Protocol (MMMP) is for the Boston Alternative Energy Facility (the Facility). This report is provided on behalf of Alternative Use Boston Projects Limited (the Applicant), to support the application for a Development Consent Order (DCO) (the DCO application) for the Facility that has been made to the Planning Inspectorate under Section 37 of the Planning Act 2008 (the Act).
- 1.1.2 The purpose of this Outline MMMP is to define the measures to be put in place to mitigate the potential impacts of any physical injury or permanent auditory injury (Permanent Threshold Shift (PTS)) to marine mammals associated with the construction and operation of the proposed Facility.
- 1.1.3 The draft DCO (document reference 2.1, APP-005) contained a number of measures to protect marine mammals during piling operations and also from an increase in vessel presence associated with the Proposed Development during both construction and operation. These measures have been consolidated into this Outline MMMP and a new condition has been added to the draft Deemed Marine Licence (DML) contained within Schedule 9 to the latest version of the draft DCO (document reference 2.1(1)) submitted at Deadline 1, which requires a final MMMP to be approved by the MMO following consultation with the statutory nature conservation body and Lincolnshire Wildlife Trust. The final MMMP submitted for approval must be in accordance with this Outline MMMP
- 1.1.4 This Outline MMMP sets out the protocol of how the proposed Facility would mitigate impacts assessed in Environmental Statement Chapter 17 Marine and Coastal Ecology (document reference 6.2.17, APP-055), to reduce the likelihood of any potential physical or permanent auditory injury to marine mammals as a result of underwater noise during underwater piling operations and the presence of vessels during construction and operation.

2 Summary of Potential Impacts to Marine Mammals

- 2.1.1 High exposure levels from underwater noise sources (such as impact piling) can cause permanent auditory injury or hearing impairment, through permanent loss of hearing sensitivity (PTS).
- 2.1.2 Piling at the Facility will be for both sheet piles and tubular piles, and will use impact piling. Sheet piles would take up to five minutes each to install, while tubular piles would take up to 15 minutes.





- 2.1.3 A number of piling rigs would be on site at any one time, allowing for the next piles to be placed in readiness for piling, while the previous are installed. It is possible that there would be continuous piling, as there would sufficient rigs on site to allow for changeover times to occur while other piles are installed. However, it is unlikely that there would be any simultaneous piling as each pile location would have its own specific requirements, that would require previous piles to be installed in order for the next to be installed. A maximum of 96 sheet piles could therefore be installed in any one day, and a maximum of 48 tubular piles.
- 2.1.4 PTS can occur instantaneously from acute exposure (Sound Exposure Level (SEL)) to high noise levels, such as single strike (SEL_{ss}) of the maximum hammer energy during piling. PTS can also occur as a result of prolonged exposure to increased noise levels, such as during the duration of pile installation (SEL_{cum}).
- 2.1.5 Due to the water levels at the Facility during low water (or within three hours of low water), noise levels are not expected to propagate at distance from the sound source. Therefore, there is not expected to be any significant levels of noise for piling undertaken during low water, and the mitigation measures as provided within this Outline MMMP are only required for piling during periods of deeper water or high water (or within three hours of high water).
- 2.1.6 **Table 2-1** summarises the assessments relevant to the Outline MMMP for underwater noise impacts to harbour seal due to piling, dredging, and vessels, during construction and operation, and the potential for an increase in collision risk with vessels, during construction and operation. Further information on these assessments is within Chapter 17 Marine and Coastal Ecology¹, Appendix 17.1 Habitats Regulations Assessment ², and the Marine Mammal Addendum (document reference 9.14).





Table 2-1 Summary of underwater noise assessments (PTS) and vessel collision risk for marine mammals (harbour seal only)

Potential impact	Criteria and threshold	Impact range (and area)	Maximum number of individuals (% of reference population)	Magnitude	Sensitivity	Impact significance	Mitigation
			Construction related impa	acts only			
PTS from single strike piling	218 dB re 1 µPa SPL _{peak} unweighted impulsive criteria (Southall et al., 2019)	0m (0km²)	0 harbour seal	No potential for impact.	High	No impact.	Mitigation for piling at high water following Joint Nature Conservation Committee (JNCC)
PTS from cumulative piling)	185 dB re 1 µPa²s SELcum weighted impulsive criteria (Southall et al., 2019)	90m (<0.01km²)	0.008 harbour seal (based on the harbour seal density of 0.80/km² at the Application Site)³. 0.0002% of the SE England Management Unit (MU) population⁴. 0.0003% of the most recent count of adult seals in The Wash⁵.	Permanent effect with negligible magnitude (less than 0.001% of the reference population anticipated to be exposed to effect).	High	Minor adverse	Protocol (JNCC, 2010), as outlined in Section 3.1 and Box 1
PTS from dredging Activities (cumulative)	201 dB re 1 µPa²s SELcum weighted non-impulsive criteria	<10m (0.0003km²)*	0.0002 harbour seal (based on the harbour seal density of 0.80/km² at the Application Site). 0.000005% of the SE England MU population.	Permanent effect with negligible magnitude (less than 0.001% of the reference population	High	Minor adverse	No mitigation required as highly unlikely that marine mammal would be in very close vicinity

³ Russell et al., 2017

⁴ Special Committee on Seals (SCOS), 2020

⁵ SCOS, 2020





Potential impact	Criteria and threshold	Impact range (and area)	Maximum number of individuals (% of reference population)	Magnitude	Sensitivity	Impact significance	Mitigation
	(Southall <i>et al.</i> , 2019)		0.000008% of the most recent count of adult seals in The Wash.	anticipated to be exposed to effect).			(<10m) for 24 hours or more.
	•		Construction and operation rel	ated impacts	•		
Increased risk of collision for marine mammals (impact zone includes the Wash as a transit area) during both construction and operation [5% at increased risk]	-	10.46km²	1.7 harbour porpoise (based on the harbour seal density of 3.189/km² over whole project area). 0.05% of the SE England MU population. 0.07% of the most recent count of adult seals in The Wash.	Permanent effect with medium magnitude (between 0.01% and 0.1% of the reference population anticipated to be exposed to effect).	Low	Minor adverse	Mitigation for vessels as outlined in Section 3.3 and Box 2





3 Marine Mammal Mitigation Measures

3.1 Piling

- 3.1.1 As a precautionary approach, mitigation will be undertaken for piling works conducted three hours either side of high water, to ensure that any potential impact to marine mammals (and fish species) are reduced as far as is possible. These measures are secured as part of the piling method statement required by condition 13 of the DML (Schedule 9 to the draft DCO (document reference 2.1(1)).
- 3.1.2 This mitigation would include (as is described further below):
 - Pre-piling watch for marine mammals, when piling activities are undertaken
 within three hours of high water, following the standard JNCC 'Statutory
 nature conservation agency protocol for minimising the risk of injury to
 marine mammals from piling noise' (JNCC Protocol)⁶ (JNCC, 2010) for
 minimising the risk of injury to marine mammals from piling noise; and
 - Soft-start and ramp-up procedures, for piling activities undertaken within three hours of high water.

3.2 Mitigation Protocol for Piling

3.2.1 A flowchart of the mitigations for piling (for commencement during high water ⁷ only) is included in **Box 1**. See paragraph 2.1.5 for more information.

Pre-Piling Watch

- 3.2.2 For any piling activity that commences three hours either side of high water, a prepiling watch will be undertaken for a period of at least 30 minutes prior to piling. This will be undertaken by fully qualified and experienced Marine Mammal Observers (MMObs) during hours of daylight and good visibility (as defined within the JNCC MMOb recording forms⁸ as more than 1km in all directions [noting the restrictions set out in paragraph 3.1.6]).
- 3.2.3 The majority of watches are expected to be completed using MMObs, however, in the case that there is low visibility due to fog (or other adverse weather conditions), noting that no piling would be undertaken in darkness due to the







daytime piling restrictions⁹, and the piling is to commence in periods of high water, then Passive Acoustic Monitoring (PAM) could be utilised to undertake the prewatch. PAM should only be undertaken by suitably trained and experienced PAM Operators (PAM-Ops).

3.2.4 The pre-piling watch should monitor a 500m radius around the piling location (referred to as the mitigation zone). Note that due to the location of the BAAEF, it may not be possible to see the entire mitigation zone from all piling locations (due to the bend in the river to the north of the BAEF, however, the minimum viewable distance would be at least 150m at all times, and the full 500m mitigation zone would be used wherever possible to do so. The maximum potential PTS range of 90m would be visible at all times and for all piling locations. In the case that marine mammals are detected within the mitigation zone, the commencement of piling would be delayed until the marine mammal is outside of the mitigation zone for 20 minutes, and the full 30 minute pre-piling watch has been completed.

Soft-Start and Ramp-Up Protocol

- 3.2.5 The soft-start and ramp-up procedure for piling, if possible, will be conducted prior to any piling that commences within three hours either side of high water. Each piling event will commence with a hammer energy at as low as is reasonably practical, followed by a gradual ramp-up to full hammer energy. Note that, due to the very short expected piling times of five minutes or 15 minutes per pile (dependent on pile type), the full soft-start procedure as stated within the JNCC Piling Protocol (JNCC, 2010) may not be possible. However, the piling, where possible, would commence with hammer energies as low as is reasonably practical, with a ramp-up to full hammer energy for as long a period as is possible.
- 3.2.6 This procedure is only required where piling commences within three hours of high water, and where there has been no piling for the preceding 10 minutes (i.e. if piling continues at a new location within 10 minutes of a pile being installed, as is expected, then this soft-start and ramp-up protocol would not be required).
- 3.2.7 If a marine mammal enters the mitigation zone during the soft-start and ramp-up procedure, then, if possible, the piling energy will not increase until the marine mammal exits the mitigation zone.

Full Piling Sequence

3.2.8 Due to the specific piling requirements of this project, with a piling period of five minutes for each sheet pile, and 15 minutes for each tubular pile, 'full piling' refers

6

⁹ Of between 7am and 7pm, or 8am and 8pm, during the summer months only (of May to September)





to a sequence of piling, at different piling locations, with no break in overall piling (i.e. a piling sequence would include multiple sheet piles, and the next pile sequence would commence only when there is a break of more than 10 minutes in piling).

3.2.9 When piling at full power, there is no requirement to cease piling or reduce the power if a marine mammal is detected in the mitigation zone.

Breaks in Piling

- 3.2.10 In the event that piling activity is stopped for more than 10 minutes, the piling coordinator would ensure that the pre-piling watch, soft-start and ramp-up procedure (if possible) is conducted prior to piling re-commencing, if the piling sequence re-commences in a period three hours either side of high water.
- 3.2.11 If a watch has been undertaken in the 30 minute period prior to the piling sequence re-commencing (either by a MMOb or by PAM), then there would be no requirement for the full pre-piling monitoring to be undertaken, as the 30 minute watch has already been completed.

Reporting

3.2.12 Reporting would be undertaken following the JNCC Statutory protocols^{10,11}.

3.3 Vessels

- 3.3.1 Mitigation measures will be applied to reduce the potential impacts due to the increased number of vessels in the area (the potential for an increase in collision risk and disturbance from vessels). These are referred to as best practice measures, and are summarised below:
 - Observers on board each vessel, monitoring for marine mammals as the vessel makes its way through The Wash and up The Haven.
 - Safety, weather and tidal conditions permitting, vessel speed limits of 6 knots for all vessels travelling within The Haven and The Wash, will reduce the potential for fatal collisions with marine mammals, including harbour seal.
 - Safety permitting, vessels will maintain the same course (if possible) and speed to give, if required, any seal time to avoid the vessel.
- 3.3.2 The observers on the vessels can be non-dedicated, and therefore can be a







member of the vessels crew, provided that they do not undertake other duties while they are required for marine mammal observations. They should still be qualified as an MMOb, with a JNCC accredited training course.

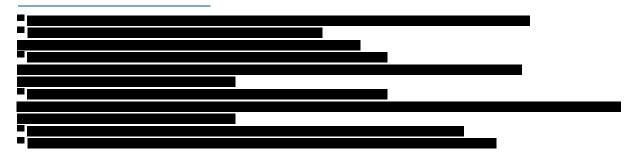
- 3.3.3 The best practice measures for vessels travelling through and into The Wash and The Haven are shown in **Box 2**.
- 3.3.4 These measures will form part of the Navigation Management Plan (NMP) secured by Requirement 14 of the draft DCO.

Best Practice Measures for Vessels during Construction and Operation

- 3.3.5 The best practice measures follow the relevant principles as outlined in:
 - The Sea Watch Foundation Pinniped Code of Conduct (Sea Watch Foundation, 2021)¹²;
 - Cornwall Marine and Coastal Code Guidelines (Cornwall Marine and Coastal Code Group, 2017)¹³;
 - Scottish Marine Wildlife Watching Code Parts 1¹⁴ and 2¹⁵ (Scottish Natural Heritage (SNH) (now NatureScot), 2017a; SNH, 2017b);
 - The Wash & North Norfolk Coast Wild Recreation Guide (The Norfolk Coast Partnership, 2021)¹⁶; and
 - North Norfolk District Council Personal Watercraft Code of Conduct (North Norfolk District Council, 2017)¹⁷.

<u>Observers</u>

- 3.3.6 As outlined above, all vessels used by the Facility, during both the construction and operational phases, best practice is to have a non-dedicated MMOb on board, to keep watch for any harbour seal (or other marine mammal presence), within both The Haven and The Wash. A non-dedicated MMOb relates to a fully trained MMOb (by an JNCC accredited course), who may undertake other vessel duties while not required on watch (i.e. this can be a member of the vessel's crew).
- 3.3.7 The MMOb should be equipped with binoculars, and in the case of any sighting,







- evaluate its location and heading against the location and heading of the vessel. Measures should be taken, if required, to avoid a collision with the individual.
- 3.3.8 The purpose of having a MMOb on board each vessel will be to watch ahead of the vessel, to ensure that no harbour seal (or other marine mammal) is at risk of collision with the vessel. If a harbour seal (or any other marine mammal) is sighted and considered to be at risk, the protocol is to maintain vessel speed and course (if possible) to allow the seal to move out of the way.
- 3.3.9 In addition, for vessels preparing to leave the anchorage area, the MMOb would be required to undertake a check of the area surrounding the vessel, to ensure there are no seals within close proximity to the vessel, particularly the propellors, prior to the vessel starting the engine for transit through the Haven.
- 3.3.10 Additional measures that could be taken, only in the case that it is observed that the individual is not vacating the area and is at risk of collision, include slowing down of the vessel. However, this should only be undertaken where the harbour seal (marine mammal) is at risk and not moving, and it is possible and safe to undertake these additional measures.

Vessel Speed and Direction

- 3.3.11 Subject to safety considerations, and directions from the Port of Boston Pilot and /or the vessel Master, vessels travelling to and from the Facility, would be required to follow a **strict speed limit** of 6 knots or less when within The Wash or The Haven.
- 3.3.12 Best Practice measures relating to **speed and direction** are:
 - Vessels will maintain a steady speed, and direction, at all times, to allow any
 marine mammal to predict where the vessel may be headed, and to move
 out of the way. Vessels should use the defined anchorage area and shipping
 channel at all times.
 - Avoid wherever possible (considering the vessels manoeuvrability) heading directly towards any harbour seal (or other marine mammals) that may either be in the sea, or hauled-out on land. Plate 4-1 shows the direction of approach that should be avoided.
 - Within 300m of a marine mammal at sea, vessel should maintain speed and direction to ensure the individual can predict the vessel movements, and move out of the area if needed. Vessels should avoid passing within 100m of a marine mammal (at sea) wherever possible (Plate 4-1).





- Vessels should not approach within 600m of known seal haul-out sites¹⁸.
- Extra care should be taken during the harbour seal pupping season of June to July (inclusive), and moult period of August.
- If a marine mammal chooses to approach the vessel (for example, to bowride) maintain the vessels speed and direction.

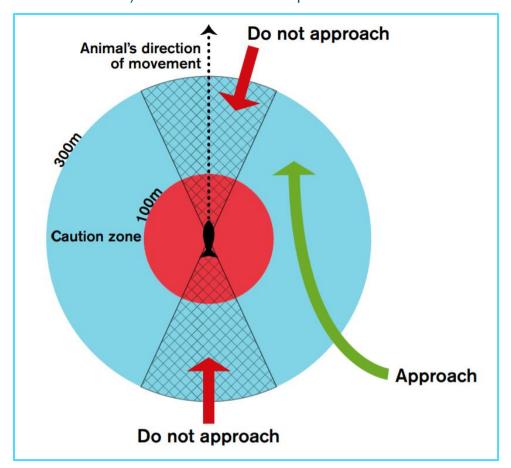


Plate 3-1 Direction of approach to any marine mammal to be avoided (taken from SNH, 2017b)

- 3.3.13 **General measures** that would be taken in order to reduce the risk of disturbance to marine mammals include:
 - Keeping a well-maintained engine and propellor to minimise underwater noise.
 - Turning off 'noisy' equipment when close to marine mammals (e.g. engines, propellors, echo sounders) if possible.

¹⁸ As most recently reported in the 2018 harbour seal haul-out site report:





Reporting of Stranding's and Collisions

3.3.14 Any stranding and / or collision event should be reported:

- Any live strandings and / or non-fatal collisions (where the location of the individual is known) should be reported to British Divers Marine Life Rescue (BDMLR) (contact details are in **Box 3**).
- Any deceased strandings and / or fatal collisions should be reported to the Cetacean Stranding's Investigation Programme (CSIP) (contact details are in **Box 3**).
- 3.3.15 For any stranded or injured seal, MMOb should determine whether the individual is exhibiting normal behaviour, or whether it requires assistance. A seal may require assistance for one of the following reasons:
 - Abandonment of juvenile seals
 - Juvenile grey seals have a white coat, and are born in November and December
 - Harbour seals are born in June and July
 - Monitor the seal periodically for as long as possible (for a period of at least 30 minutes, but preferably up to two hours) to determine whether there is a parent seal nearby
 - Malnutrition
 - Signs of malnutrition include visible ribs, hips and neck. Sometimes the skin can be baggy and wrinkled in places
 - Unwell signs of ill health include
 - Coughing, sneezing or noisy, rapid breathing
 - Thick mucus coming from the nose, wounds or swellings
 - Favouring one flipper when moving
 - Cloudy eyes, or mucus around the eyes, or one eye kept closed
 - Seal showing little response to any disturbance (unless asleep)
 - Entanglement in rope or gear
- 3.3.16 Any other marine mammal (dolphin, porpoise, or whale) that has stranded will require immediate assistance do not attempt to help, call British Divers Marine Life Rescue (BDMLR) for specialist assistance, following the instructions in **Box 3**.
- 3.3.17 Photographs, and a record of any collision incidents, should be kept by the vessel





crew for reporting to the relevant bodies. Box 4 provides a collision event form that should be used in the case that any collision occurs, and Box 5 provides a stranding form.

Mitigation Protocols 4

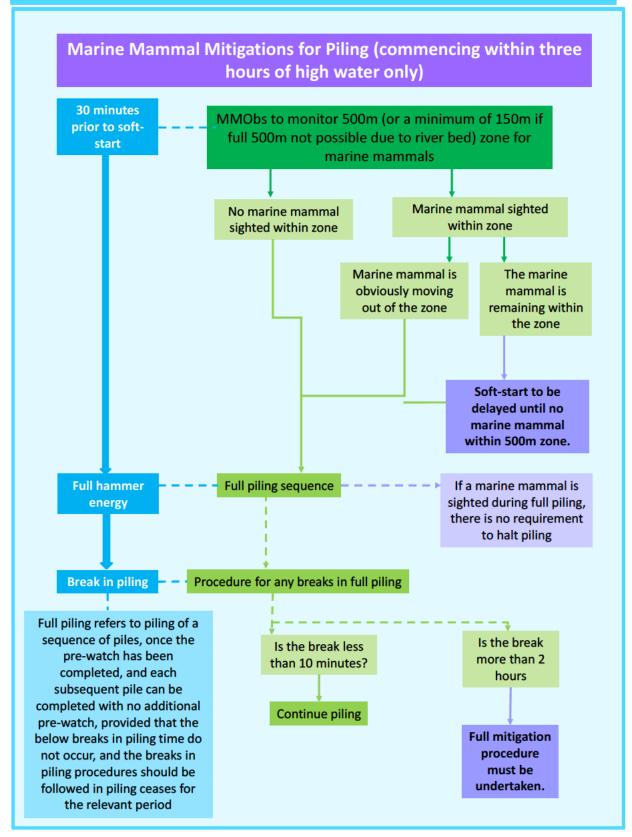
- 4.1.1 The mitigation protocol for piling is shown in **Box 1**.
- 4.1.2 The best practice measures for vessels travelling through and into The Wash and The Haven are shown in **Box 2**.
- 4.1.3 Details for the reporting of stranded or deceased marine mammals are in **Box 3**.
- 4.1.4 Reporting forms for any collision and / or stranding are in **Box 4** and **Box 5**.

19 October 2021





Box 1 Mitigation Protocol for Piling







Box 2 Best Practice Measures for Vessels

Mitigation Measures for Vessels during Construction and Operation – Page 1

MMObs

- All vessels to have non-dedicated MMOb on-board, watching primarily ahead of vessel to ensure no marine mammals at risk of collision
- MMOb to be on watch while vessel is transiting through The Wash and up The Haven
- MMOb to undertake a check for seals close to the vessel, prior to engines starting and transiting through the Haven
- If a marine mammal is sighted ahead of vessel
 - MMOb to evaluate individual/s location and heading to determine potential for being in route of vessel
 - Vessel to maintain speed and direction (if possible) to give time for individual to move out of the way
 - Evasive measures only required if collision with marine mammal will occur otherwise (and it is possible and safe to undertake), and include
 - Change in vessel direction
 - Change in vessel speed (slow down)

General measures

- · Keep engines and propellors well-maintained
- Turn off 'noisy' equipment when close to marine mammal/s (if possible)





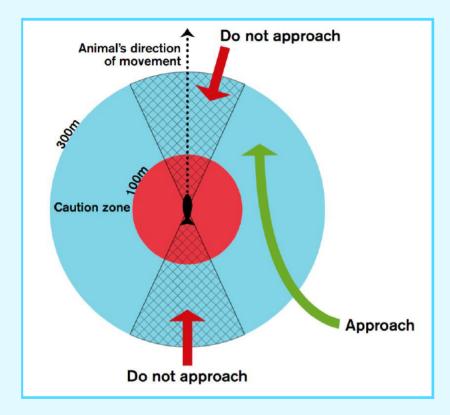
Mitigation Measures for Vessels during Construction and Operation – Page 2

Vessels in Transit through The Wash and The Haven

Abide by vessel speed limits at all times

6 knots or less when within The Wash or The Haven

- Vessels to use defined anchorage area and shipping channel at all times
- Mitigation measures to be followed are below (wherever possible considering vessel manoeuvrability and any health and safety concerns)
 - o Avoid being within 600m of a haul-out site
 - Vessels to maintain steady speed and direction
 - Extra care to be taken during harbour seal pupping season of June to August (inclusive)
 - o If individual/s approach the vessel, maintain speed and direction
 - Avoid heading directly towards any marine mammal/s follow guidelines in figure below







Box 3 Reporting of Marine Mammal Strandings

Reporting of Marine Mammal Strandings

Any live strandings and / or non-fatal collisions (where the location of the individual is known) should be reported to BDMLR

	01825 765546 Monday-Friday (9am-5pm) 07787 433412 Out of office hours and Bank Holidays
RSPCA Hotline	0300 1234 999 24 hours

- For seals, follow this advice:
 - 1. Collect an accurate description of the seal
 - 2. Estimate the length of the animal and look for any distinguishing features
 - 3. Look for any signs of injury
 - 4. Provide information regarding location
 - 5. Avoid disturbance of the seal, do not scare it into the sea
 - 6. Do not touch the seal
- For cetaceans (dolphins, porpoises, whales), follow this advice:
 - 1. Avoid disturbance, excessive noise and too many observers
 - 2. Do not touch the cetacean and remain at a safe distance
 - 3. Estimate the length of the animal and look for any distinguishing features
 - 4. Look for any signs of injury
 - 5. If visible from a distance or via visual aids, count the number of breaths (opening of the blowhole) that occur over a minute
 - 6. Provide information regarding location
 - Provide an accurate description of the animal, including its breathing rate, and whether it is in the surf, on rocks or sand, in the shade or in the full glare of the sun
 - 8. Provide information on weather conditions and sea state

Any deceased strandings and / or fatal collisions should be reported to the CSIP

CSIP Hotline	0800 652 0333
Further information	





Box 4 Marine Mammal Collision Reporting Form

Marine Mammal Collision Reporting Form If a vessel is involved in a collision with a marine mammal, details of the incident should be captured using the following form. Contact Details for reporting - to be reported within 24 hours of incident This form shall also be sent to the person in charge of the works, or the environmental liaison officer, as well as the regulator; Marine Management Organisation (MMO) - England marine.consents@marinemanagement.org Form to be completed Details of the incident (to be filled in by Vessel Master) Vessel Date & Time Approx. Location **Vessel Activity** Species Involved (if known) e.g. harbour porpoise; seal No. animals e.g. 1; small group; large group Outcome of □ Near ☐ Minor ☐ Major □ Presumed ☐ Known ☐ Other the collision miss injury injury dead dead **Photographic** Evidence (if ☐ Yes (provided with form) ☐ Unable to capture following the incident applicable) Description of incident, and any further information: Mitigating actions taken:





Box 5 Stranded or Deceased Marine Mammal Reporting Form

Stranded or Deceased Animal Reporting Form - Page 1

If a stranded or deceased marine mammal is found, details of the individual should be captured using the following form.

Contact details for reporting - to be reported within 24 hours of incident

This form shall also be sent to the person in charge of the works, or the environmental liaison officer, and kept on file for any later information requested from a regulator

Any live strandings should be reported to BDMLR to get help for the individual

BDMLR Rescue Hotline	01825 765546 Monday-Friday (9am-5pm) 07787 433412 Out of office hours and Bank Holidays
RSPCA Hotline	0300 1234 999 24 hours

Note that any deceased strandings and / or fatal collisions should be reported to CSIP

CSIP Hotline	0800 652 0333
Further information	

Marine mammal stranding form can be found on next page.





Stranded or Deceased Animal Reporting Form - Page 2 Form to be completed Details of the incident (to be filled in by Vessel Master) Date Time Reported by **Employer** Location of deceased or stranded animal Weather conditions Animal ☐ Seal ☐ Cetacean No animals: Status ☐ Alive ☐ Dead (look for evidence of breathing, response to noise etc.) If alive, please give details of behaviour, body condition & trauma. ☐ Active ☐ Still / quiet □ Coughing □ Sneezing ☐ Thin ☐ Plump ☐ Cloudy eyes □ Squinting □ Trauma □ Blood □ Entangled □ Clear eyes ☐ Other Further information: If dead, status of carcass ☐ Fresh □ Decomposing Photographic information provided ☐ Yes □ No Parties contacted (e.g. CSIP)

19





5 References

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