Rampion 2 WIND FARM

Rampion 2 Wind Farm
Category 7:
Other Documents
Outline Project Environmental Management Plan (PEMP) (tracked)
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Contents

1.	**Introduction**	**5**
1.1	Purpose and objective of this document	5
1.2	Project background	6
1.3	Final PEMP Structure	7
1.4	Review process	7
2.	**Associated documents**	**11**
3.	**Environmental management system and roles & responsibilities**	**13**
3.1	RACI matrix	13
3.2	RWE Environmental Management System	15
3.3	Environmental policy and objectives	15
3.4	Environmental measures	15
4.	**Management of key environmental issues**	**17**
4.1	Marine archaeology	17
4.2	Marine ecology	17
	Benthic Ecology	17
	Marine Mammals	18
	Offshore ornithology	19
	Fish and Shellfish	19
4.3	Fisheries Liaison	20
4.4	Emissions to air	20
4.5	Waste management	20
	Wastewater discharges	20
4.6	Oils, Fuels and Chemical Management	21
5.	**Legislative and regulatory compliance**	**23**
6.	**Personnel, training and induction**	**25**
6.1	Training and competence	25
	Subcontractor management	26
6.2	Leadership and commitment	26
6.3	Environmental induction and training	26
	Vessel inductions	27
7.	**Communication and stakeholder management**	**29**
7.2	Internal communication	29
7.3	External communication (stakeholder and community)	29
7.4	External communication (environmental regulatory agencies)	30
7.5	Stakeholder requirements	30

Crown Estate Agreement for Lease 30
RED Shareholders / Board 31

8. Documentation and records management 33

8.1 Documented information 33
8.2 Records 33

9. Environmental monitoring and auditing 35

9.1 Environmental monitoring programmes 35
9.2 Environmental auditing 35
9.3 Non-Conformances and Corrective Actions 36

10. Complaints and incident management 37

10.1 Complaints protocol 37
10.2 Environmental incident response 37

11. Glossary of terms and abbreviations 39

12. References 41

List of Tables

Table 2-1 Associated documents 11
Table 3-1 RACI Matrix 13
Table 9-1 Environmental audit requirements 35
Table 11-1 Glossary of terms and abbreviations 39

List of Graphics

Graphic 1-1 Site Boundary and Offshore Export Cable Area 9

List of Appendices

Appendix A Outline Marine Pollution Contingency Plan
Appendix B RWE Renewables health safety and environmental policy
Appendix C Rampion 2 incident reporting procedure
Appendix D Rampion 2 marine spill procedure
Appendix E Rampion 2 dropped object procedure
Appendix F POLREP- Pollution report form for vessels
Appendix G Marine licence dropped incident report- MLDIR1
Appendix H Crown Estate HSI notification form
Appendix I RWE Renewables incident classification
Appendix J Marine Biosecurity Plan

Executive Summary

The Outline Project Environmental Management Plan (PEMP) [(REP4-049] ~~Document Reference: 7.11)~~ is the primary document for the offshore aspects of the Rampion 2 environmental management system. The purpose of this Outline PEMP is to set out the framework for the Final Project Environmental Management Plan (Final PEMP) including the controls that are proposed to manage the environmental risks associated with the construction and operation of the offshore components of Rampion 2.

As set out in **Section 3**, environmental management roles and responsibilities for Rampion 2 will be documented in the Final PEMP and will set out the environmental responsibilities for the project, including identification of key site staff.

Section 4 outlines the management of key environmental issues, including for marine archaeology, marine ecology, fisheries liaison, as well as emissions to air, waste management, and oils, fuels and chemical management.

Section 5 sets out legislative and regulatory compliance, and **Section 6** outlines how offshore contractors, subcontractors and their suppliers will be required to observe the relevant provisions of the Final PEMP, and how training on the various elements of the PEMP will be conducted.

Section 7 sets out the approach to communication and stakeholder management during the construction phase of Rampion 2, and the requirements for internal and external stakeholders. **Section 8** sets how documentation will be managed and recorded and **Section 9** explains the requirements for environmental monitoring and auditing. **Section 10** explains how complaints and incidents will be managed.

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1. Introduction

1.1 Purpose and objective of this document

1.1.1 There are potential environmental effects associated with an offshore wind farm development, which need to be identified and considered before construction of the project takes place.

1.1.2 These potential effects are outlined in the Rampion 2 **Environmental Statement, Volume 2** (**ES**) (Document Reference: 6.2). The ES also includes embedded environmental measures through design and additional mitigation in the form of good practice that will require to be adhered to during the construction and operation phases of the Proposed Development.

1.1.3 This Outline Project Environmental Management Plan (Outline PEMP) is provided as part of the Development Consent Order (DCO) application to demonstrate the linkages between the impact assessments for the offshore components of Rampion 2 (detailed in **Chapter 6: Coastal processes** to **Chapter 16: Marine Archaeology, Volume 2, Volume 2** of the ES ~~[(~~**~~APP-047]~~** ~~Document Reference: 6.2.6 to~~ **~~REP3-0156.2.16])~~**~~,)~~ offshore development activities, and requirements and/or conditions of the deemed Marine Licences imposed as part of the DCO. The Outline PEMP is the primary document for the offshore aspects of the Rampion 2 environmental management system (EMS) and is accompanied by associated parent documentation outlined in **Section 2: Associated documents**. Other key documents in the Rampion 2 EMS include:

1.1.4 An **Outline Code of Construction Practice** (**Outline CoCP**) **[(~~Document Reference: 7.2)~~REP5-064]** is provided with the DCO application to provide information relating to the onshore construction works. The onshore components of Rampion 2 are not included within this Outline PEMP.

1.1.5 An **Offshore In Principle Monitoring Plan (IPMP) [(REP4-055~~Document Reference: 7.1]8)~~** is provided with the DCO application and sets out the monitoring measures as required by the conditions contained within the deemed Marine Licences (dMLs).

1.1.6 The purpose of this Outline PEMP is to set out the framework for the Final Project Environmental Management Plan (Final PEMP) including the controls that are proposed to manage the environmental risks associated with the construction and operation of the offshore components of Rampion 2. The document is based on the Rampion 2 **ES**, industry good practice, and relevant legislation (at the time of preparation). The objectives of the Outline PEMP are:

- to enable construction activities to take place as required by Rampion 2 in an environmentally responsible manner; and
- to provide staff and contractors with clear, concise, and practical environmental management measures.

1.1.7 The Final PEMP will be produced prior to construction and will set out the controls and processes that are to be adopted to mitigate the environmental impacts of

Rampion 2 and environmental measures set out to comply with consent conditions in the dMLs and in line with this Outline PEMP. The Final PEMP will be an iterative document that develops throughout the Rampion 2 detailed design process, its procurement and construction.

1.1.8 A series of contractors will be responsible for the detailed design, construction and installation of the main infrastructure associated with the Proposed Development, including Wind Turbine Generator (WTG) foundations, WTG erection, offshore cable laying, offshore electrical platforms and export cable landfall. These may be managed as individual projects or as a framework. A Project Manager will be appointed who will have responsibility for updating the Final PEMP and distributing it to all the relevant contractors.

1.1.9 Requirements within the Final PEMP will be communicated to contractors, where relevant, to discharge the relevant licence conditions and to communicate environmental requirements and standards to facilitate incorporation into their Environmental Management Plans. The Final PEMP must be the responsibility of the Project Manager to manage in close working with the contractors.

1.2 Project background

1.2.1 Rampion Extension Development Limited (hereafter referred to as 'RED') (the Applicant) is developing the Rampion 2 Offshore Wind Farm Project (Rampion 2) located adjacent to the existing Rampion Offshore Wind Farm Project ('Rampion 1') in the English Channel.

1.2.2 Rampion 2 will be located between 13km and 26km from the Sussex Coast in the English Channel and the offshore array area will occupy an area of approximately 160km^2.

1.2.3 The key offshore elements of the Proposed Development will be as follows:

- up to 90 offshore wind turbine generators (WTGs) and associated foundations;
- blade tip of the WTGs will be up to 325m above Lowest Astronomical Tide (LAT) and will have a 22m minimum air gap above Mean High Water Springs (MHWS);
- inter-array cables connecting the WTGs to up to three offshore substations;
- up to two offshore interconnector export cables between the offshore substations;
- up to four offshore export cables each in its own trench, will be buried under the seabed within the final cable corridor; and
- the export cable circuits will be High Voltage Alternating Current (HVAC), with a voltage of up to 275kV.

1.2.4 The key onshore elements of the Proposed Development will be as follows:

- a single landfall site near Climping, Arun District, connecting offshore and onshore cables using Horizontal Directional Drilling (HDD) installation techniques;

- buried onshore cables in a single corridor for the maximum route length of up to 38.8km using:
  - trenching and backfilling installation techniques; and
  - trenchless and open cut crossings.
- a new onshore substation, proposed near Cowfold, Horsham District, which will connect to an extension to the existing National Grid Bolney substation, Mid Sussex, via buried onshore cables; and
- extension to and additional infrastructure at the existing National Grid Bolney substation, Mid Sussex District to connect Rampion 2 to the national grid electrical network.

1.2.5 A full description of the Proposed Development is provided in **Chapter 4: The Proposed Development, Volume 2** of the ES [~~(~~APP-045~~Document Reference: 6.2.4]~~)~~.

1.2.6 Rampion 2's proposed DCO Order Limits are shown in **Graphic 1-1**.

1.3 Final PEMP Structure

1.3.1 The Final PEMP will include the following information:

- project description;
- environmental management structure and roles and responsibilities;
- associated documentation;
- management of key environmental issues;
- personnel, training and induction;
- communication and stakeholder management;
- documentation and records management;
- environmental monitoring and auditing; and
- complaints and incident management.

1.3.2 Outline content for each section is described in **Sections 2** to **10**.

1.4 Review process

1.4.1 The Final PEMP will be formally reviewed at least six months prior to construction commencing. It will also be reviewed within ~~six~~ three months of any significant changes. Significant changes may include:

- changes in roles and responsibilities of the Rampion Extension Development (RED) project team;
- changes in legislative or other requirements; and
- changes to processes within the Rampion 2 EMS or associated parent documentation.

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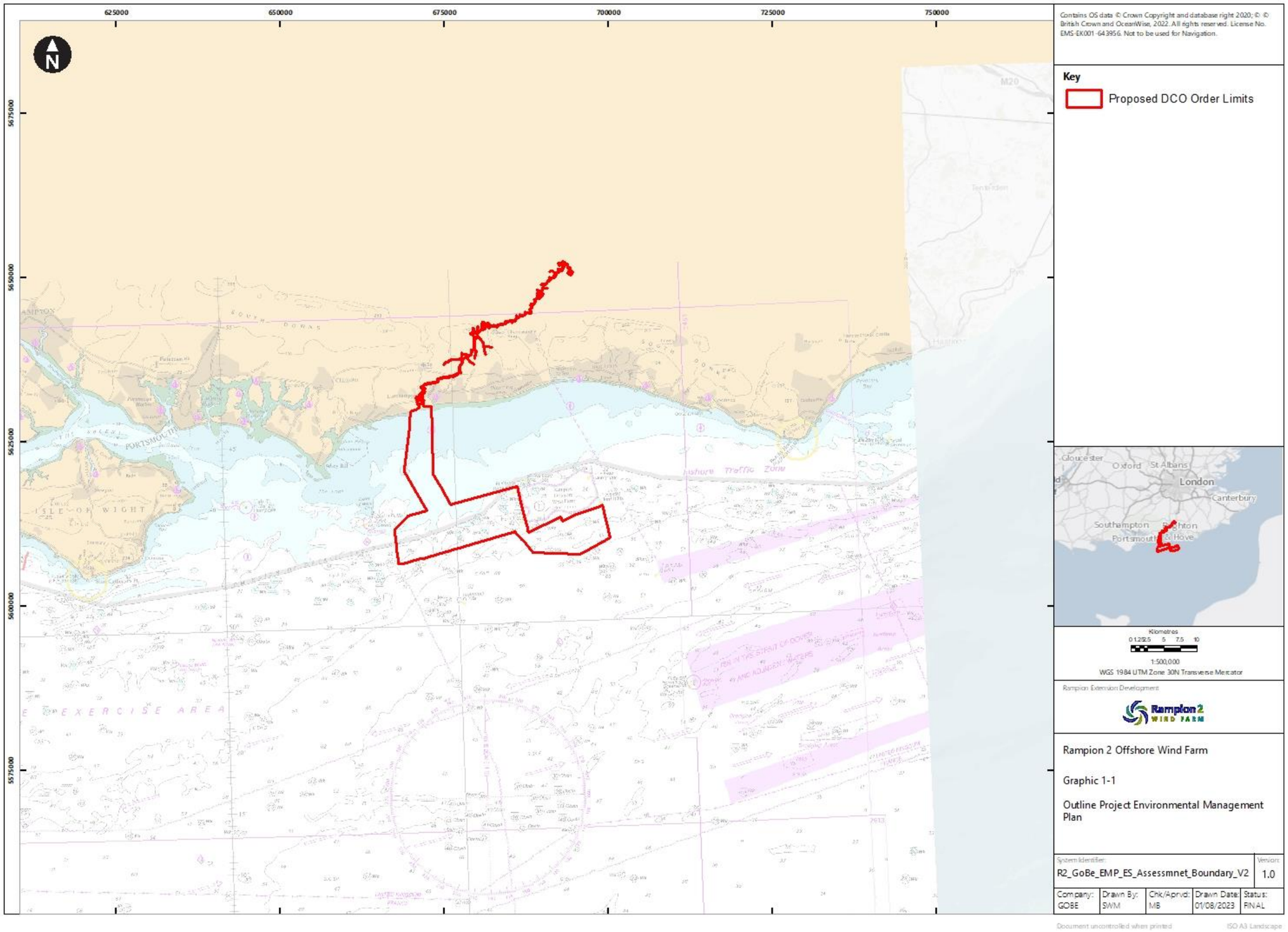
Graphic 1-1 Site Boundary and Offshore Export Cable Area



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2. Associated documents

2.1.1 The table below outlines the relevant associated EMS and Proposed Development/site specific documentation that is required to be taken into consideration by the Applicant in developing the Final PEMP. The references below are intended for use by contractors but can be made available as appropriate upon request, following approval by RED.

Table 2-1 Associated documents

Document title	Document control reference
Central EMS Documents	
RWE Renewables Health Safety & Environment (HS&E) Policy Statement	RD-300
RWE Renewables We Care Management System	WeCare_MS_Brochure
RWE Renewables HS&E Incident Management	RD-361-01
RWE Renewables Environmental Aspects	RD-345-01
RWE Renewables Environmental Management and Responses	RTO-345-01
Rampion 2 Environmental Management Documents	
Rampion 2 Environmental Aspects Evaluation Matrix	
Rampion 2 O&M Environmental Compliance Register	
Rampion 2 Other Related Procedures, Plans and Documents	
Rampion 2 **Stakeholder Engagement & Consultation Strategy**	
Rampion 2 Risk Management Plan	
External Documents	
OSPAR Guidance on Environmental Considerations for Offshore Wind Farm Development	2008-3 (OSPAR, 2008)

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3. Environmental management system and roles & responsibilities

3.1 RACI matrix

3.1.1 Environmental management roles and responsibilities for Rampion 2 will be documented in the Final PEMP and will set out the environmental responsibilities for the 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 Safety and Environmental Manager(s) and/or Advisors along with environmental specialists such as Environmental Liaison Officer, Fisheries Liaison Officer (FLO), Ornithologists, Marine Mammal Observers or Archaeologists. The contact details for the key individuals listed will also be included in the Final PEMP. **Table 3-1** provides an outline of the roles and responsibilities for the Final PEMP.

R	Responsible for performing the action
A	Accountable to ensure the action happens
C	Consulted during the action
I	Informed after the action is complete

Table 3-1 RACI Matrix

Procedural responsibility	Project manager	Senior consent manager	Onshore and offshore consents managers	HSE Manager	Contractor /Contractor Site Manager	Workforce/ sub-contractors
Ensure adequate resources and budgetary support are provided for overall implementation of the Final PEMP.	A and R	C	I	C		N/A
Oversees the implementation of the Final PEMP and relevant environmental monitoring programs required.	A	R	R	R	C	N/A
Develops and implements objectives and targets for the EMS ensuring the goals of the Final PEMP and Environmental Policies are achieved and maintained.	C	C	C	A/R	C	I
Ensures environmental impacts are minimised during planning and development phase activities; and environmental obligations set out in the Final PEMP are met.	A	R	R	R	R	I
Ensures that environmental compliance auditing is undertaken in accordance with all relevant project Environmental Management Systems monitors changes in legislation, communicate results to relevant stakeholders.	I	C	C	A/R	C	I
Identifies all environmental risks associated with the planning and development phase activities, provides specialist input and advice on environmental obligations.	C	A	R	R	C	I
Provides training and advice on environmental legislation and compliance obligations for operational staff and contractors.	A	C	C	R	R	I
Inform all contractors of the Final PEMP and disseminate associated documentation as required.	I	I	I	A/R	C	I
Ensure compliance with provisions of the Final PEMP.	C	C	C	A/R	C	I
Ensures continual improvement of Environmental Management including EMS documentation.	A	R	C and I	R	R	I

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3.2 RWE Environmental Management System

3.2.1 The Rampion 2 PEMP is the primary document for the offshore elements of Rampion 2 within the Rampion 2 environmental documentation and is linked to the wider RWE EMS, key documents of the RWE EMS include:

- RWE We Care Management System; and
- RWE Renewables Environmental Aspects;

3.2.2 The Outline PEMP, together with the RWE EMS documents outlined in **Table 2-1** addresses environmental aspects, impacts and other factors that could influence Rampion 2's environmental performance.

3.2.3 The RWE Group companies incorporate current versions of the Group Directives/Group Business Rules as a binding part of their regulations. Group companies are free to elaborate on/add detail to the Group Directives/Group Business Rules, insofar as this does not contradict the Group's regulatory framework. As such Rampion 2 can have project specific policies where these have been developed or abide to group wide ones such as RWE Renewables Health Safety & Environment (HS&E) Policy Statement for instance.

3.3 Environmental policy and objectives

3.3.1 Rampion 2 subscribes to the RWE Renewables (RWE RES) Health, Safety and Environmental (HS&E) Policy Statement (**Appendix B**), which states the environmental commitments which Rampion 2 will adopt.

3.3.2 The RWE RES HS&E Policy Statement will be communicated to the Rampion 2 personnel. The statement will be communicated to key external stakeholders and contractors as appropriate. In addition, the statement can be made available as appropriate on request at any time by the HS&E Advisor.

3.3.3 Rampion 2 will abide by the RWE "Our Care Commitments" of the RWE RES HS&E Policy Statement (**Appendix B**). Progress is monitored and reported at the Rampion 2 Monthly Management Meeting.

3.3.4 RWE Renewables establishes HSE objectives at relevant functions and levels in order to maintain and continually improve the We Care Management System and HSE performance. Targets, goals and plans are communicated to all affected Employees and to principal contractor(s) to ensure awareness and implementation.

3.4 Environmental measures

3.4.1 As part of the Rampion 2 design process, a number of embedded environmental measures have been adopted to reduce the potential for environmental impacts and effects. These embedded environmental measures have evolved over the design development process and in response to consultation. They have fed iteratively into the EIA. As there is a commitment to implementing these environmental measures, and also to various standard sectoral practices and procedures, they are considered inherently part of the design of Rampion 2 and

are set out in the **ES**. The measures are presented in full in the **Commitments Register** [~~(Document Reference: 7.22~~REP5-086]~~)~~.

3.4.2 **Chapter 5: Approach to the EIA, Volume 2** of the ES [~~(~~APP-046~~Document Reference: 6.2.]5)~~ explains the approach to embedded environmental measures that has been applied in the **ES**. The environmental assessments presented in **Chapter 6: Coastal pProcesses** to **Chapter 29: Climate change**, **Volume 2** of the ES [~~(~~APP-047~~Document Reference: 6.2.6 – to 6.2.29~~APP-070]~~)~~ provide details of how specific embedded environmental measures are proposed to avoid, reduce or offset environmental effects.

3.4.3 RED will adopt good construction and management practices, and will apply the waste hierarchy. This will ensure that waste arising during the construction, operation and maintenance, and decommissioning of Rampion 2 is minimised as far as possible and that the storage, transport and eventual disposal of waste have no significant environmental effects.

3.4.4 Overarching project embedded environmental measures for Rampion 2 include:

- C-187 All aspects of the Proposed Development will be finished to a high standard of design with appropriate material selection, utilising best practice guidance and relevant standard including consideration for potential impacts of climate change. Concepts within relevant international and national guidance for embedding climate change into technical standards will be embedded within the further design of all assets e.g. CEN/CENELEC GUIDE 32: Guide for addressing climate change adaptation in standards (2016). This will ensure the design is resilient to climate change and able to withstand all foreseeable weather conditions during the operational life of the project. The design will use quality materials that are resilient to climate change to avoid deterioration and minimise the need for maintenance.
- C-188 Activities associated with the construction, operation, and decommissioning of the Proposed Development will be dependent upon health, safety, security and environmental (HSSE) legislation, site specific weather conditions, and, if applicable, metocean conditions. Best practice procedures and permits will be developed for activities to define procedures under adverse working conditions. RED will develop emergency response and contingency plans e.g. a Severe Weather Plan.
- C-248 Embodied Carbon: There are embodied GHG emissions associated with the raw materials used to construct the Proposed Development. Where possible, choice of local sourcing of construction should be encouraged. Circular economy principles will be considered and deployed where possible. Carbon measuring and reporting would be undertaken.

4. Management of key environmental issues

4.1 Marine archaeology

4.1.1 **Chapter 16, Marine archaeology, Volume 2** of the ES **[~~(~~REP3-015] ~~Document Reference: 6.2.16)~~** identifies sites / wrecks etc. of potential archaeological importance and these are identified in the **Outline ~~Offshore~~ Marine Written Scheme of Investigation (WSI) [~~(Document Reference: 7.13)~~REP5-076]** ~~-~~with appropriate environmental measures outlined, such as establishment of archaeological exclusion zones and the implementation of a Protocol for Archaeological Discoveries in accordance with 'Protocol for Archaeological Discoveries: Offshore Renewables Projects' (The Crown Estate, 2014) and future monitoring and assessment requirements.

4.1.2 The Final PEMP will include the measures to be adopted, in accordance with the Final ~~Offshore~~ Marine Written Scheme of Investigation (as required under dML Condition 11 in Schedules 11 and 12 of the DCO) and measures C-57, C-58. C-59, C-60, C-111, ~~and~~ C-277 and C-298 of the **Commitments Register [~~(Document Reference: 7.22~~REP5-086]~~)~~** to communicate awareness of sensitive archaeological sites to the designated members of the Project Team and the procedures to be adopted in the event of an unanticipated find.

4.2 Marine ecology

Benthic Ecology

4.2.1 Pre-construction surveys will be undertaken in advance of any cable and foundation installation works (as required under dML Condition 11 in Schedules 11 and 12 of the DCO). The methodology for the pre-construction surveys will be agreed with the Marine Management Organisation (MMO).

4.2.2 Should seabed features and obstacles (for example, unexploded ordnance (UXO) be identified in the proposed WTG locations and/or on cable routes during the pre-construction surveys, micrositing will be undertaken where possible, to minimise potential impacts (as required under Condition 11 of Schedules 11 and Condition 11(1)(a)(i) and 11(c)(iv) of Schedules 12).

4.2.3 RED is committed to burying offshore export cables where possible, thereby reducing the need for additional cable protection. An **Outline Scour Protection and Cable Protection Plan [~~(Document Reference: 7.12~~REP5-074]~~)~~** is provided with the Rampion 2 DCO Application. A Cable Specification and Installation Plan (as required under dML Condition 11 in Schedules 11 and 12 of the DCO) will be undertaken post consent, in consultation with stakeholders.

4.2.4 The risk of spreading non-native invasive species would be mitigated through use of best-practice techniques, including:

- appropriate vessel maintenance following guidance from the International Convention for the Prevention of Pollution from Ships (IMO, 1973);
- the Environmental Damage (Prevention and Remediation (England) Regulations (2015), which set out a polluter pays principle where the operators who cause a risk of significant damage or cause significant damage to land, water or biodiversity will have the responsibility to prevent damage occurring, or if the damage does occur will have the duty to reinstate the environment to the original condition; and
- the International Convention for the Control and Management of Ships' Ballast Water and Sediments (BWM Convention) (IMO, 2004), which provide global regulations to control the transfer of potentially invasive species.

4.2.5 A marine biosecurity plan will be included in the Final PEMP (the Final PEMP is required under dML Condition 11 of Schedules 11 and 12 of the DCO). Disposal of material associated with the offshore construction is considered in the **Site Characterisation Report** **[(APP-031]**~~Document Reference: 5.2)~~. The information required for site characterisation to support a disposal application is contained within the Rampion 2 **Environmental Statement** (Document Reference: 6.2).

4.2.6 An **Outline Marine Pollution Contingency Plan** is included in this Outline PEMP as **Appendix A,** as set out in measure C-53 of the **Commitments Register** **[(Document Reference: 7.22REP5-086])** and as required as required under dML Condition 11 in Schedules 11 and 12 of the DCO. The MPCP aims to minimise potential impacts on benthic ecology features from potential pollution incidents.

4.2.7 The Final PEMP will include the measures to be adopted, in accordance with the plans listed above and measures C-38, C-40, C-41, C-42, C-43, C-44, C-45, C-53, ~~C-59~~ C-65, C-95, C-96, C-111, C-269, C-270, C-271, C-272, C-279, ~~and~~ C-283, C-288, C-289, C-297, C-300 and C-305 of the **Commitments Register** **[REP5-086eP5-074].**~~(Document Reference: 7.22).~~

Marine Mammals

4.2.8 A Construction Method Statement (as required as required under dML Condition 11 in Schedules 11 and 12 of the DCO) will be produced, post-consent, prior to construction which will include details of the procedures for soft start and ramp up of piling activity, in accordance with those assessed in **Chapter 11: Marine mammals**, **Volume 2** of the ES **[(Document Reference: 6.2.11REP5-0313])**.

- Two draft Marine Mammal Mitigation Protocol (MMMP) have been submitted as part of the DCO Application: ~~one~~ for **Draft UXO Clearance Marine Mammals Mitigation Protocol** ~~UXO Clearance~~ **[(Document Reference: 7.15REP5-078])** and **Draft Piling Marine Mammal Mitigation Protocol** ~~one for Piling~~ **[(REP4-051Document Reference: 7.14])**. The draft MMMPs detail the proposed environmental measures to reduce the risk of any physical or permanent auditory injury to marine mammals during all piling and any UXO operations.

4.2.9 If, following finalisation of the project design and pre-construction surveys, construction activities are expected to cause significant disturbance or injury to a European Protected Species (EPS) (cetaceans), a risk assessment for will be

incorporated into the Final PEMP, and an EPS licence(s) applied for where applicable.

4.2.10 An **Outline Marine Pollution Contingency Plan** is included in this Outline PEMP as **Appendix A,** as set out in measure C-53 of the **Commitments Register** **[~~(~~REP5-086] ~~Document Reference: 7.22)~~** and as required under dML Condition 11 in Schedules 11 and 12 of the DCO. The MPCP aims to minimise potential impacts on marine mammals from potential pollution incidents.

4.2.11 The Final PEMP will include the measures to be adopted, in accordance with the plans listed above and measures C-51, C-52. C-53, C-54, C-95, C-102, C-265, ~~and~~ C-275, C-288, C-289 and C-298 of the **Commitments Register** **[~~(~~REP5-086~~Document Reference: 7.22~~]~~)**.

Offshore ornithology

4.2.12 An **Outline Marine Pollution Contingency Plan** is included in this Outline PEMP as **Appendix A,** as set out in measure C-53 of the **Commitments Register** **[REP5-086]** ~~(Document Reference: 7.22)~~ and as required under dML Condition 11 in Schedules 11 and 12 of the DCO. The MPCP aims to minimise potential impacts on ornithological features from potential pollution incidents.

4.2.13 In addition to the Marine Pollution Contingency Plan, the Final PEMP will include measures to reduce direct and indirect disturbance and displacement effects to ornithological features (as required under dML Condition 11 of Schedules 11 and 12 of the DCO) and in accordance with measures C-43, ~~,~~ C-52, C-53, C-65, C-89 and C-94 of the **Commitments Register** **[REP5-086]**~~(Document Reference: 7.22)~~. Details of the predicted direct and indirect disturbance and displacement effects to ornithological features can be found in Section 12.11 of **Chapter 12, Offshore and intertidal ornithology, Volume 2** of the ES **[APP-053].**~~(Document Reference: 6.2.12).~~

Fish and Shellfish

4.2.14 A **In Principle Sensitive Features Mitigation Plan** **[~~(Document Reference: 7.17~~REP5-082]~~)~~** has been submitted as part of the DCO application. This document will provide environmental measures as are necessary to avoid adversely affecting the integrity of black sea bream, a protected feature of the Kingmere Marine Conservation Zone (MCZ). It sets out the approach for RED to deliver the required environmental measures for Rampion 2 to ensure the avoidance of significant disturbance of black sea bream in relation to the Kingmere MCZ site Conservation Objectives.

4.2.15 Potential impacts to the black seabream will be mitigated through: C-45, C-52, C-53, C-65, C-96, C-111, C-265, C-269, C-270, C-271, C-272, C-273, C-274, C-279, C-280, C-281, ~~and~~ C-282, C-283, C-288, C-289, C-297 and C-300.~~.~~

4.2.16 An **Outline Marine Pollution Contingency Plan** is included in this Outline PEMP as **Appendix A**, as set out in measure C-53 of the **Commitments Register** **[REP5-086]** ~~(Document Reference: 7.22)~~ and as required under dML Condition 11 in Schedules 11 and 12 of the DCO. The MPCP aims to minimise potential impacts on fish and shellfish ecology features from potential pollution incidents.

4.2.17 The Final PEMP will include the measures to be adopted, in accordance with the black seabream measures listed above, and C-41. C-44, C-45, C-52, C-53, C-65, C-95, C-96, C-102 and C-111 of the **Commitments Register** **[REP5-086]**.~~(Document Reference: 7.22).~~

4.3 Fisheries Liaison

4.3.1 A Fisheries Liaison and Coexistence Plan (as required under DCO Condition 11(1)(f) of the Schedules 11 and 12) which aligns with the **Outline Fisheries Liaison and Co-existence Plan** **[REP1-013]**~~**(Document Reference: 7.19)**~~ submitted as part of the DCO application) must be produced to ensure relevant fishing fleets are notified of commencement of licensed activities and to address the interaction of the licensed activities with fishing activities.

4.3.2 This will include the following:

- timely and efficient Notice to Mariners (NtMs), Kingfisher notifications and other navigational warnings (of the position and nature of works including offshore cable corridor crossings) would be issued to the fishing community;
- appropriate liaison would be undertaken in line with the Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW, 2014) Best Practice Guidance for Offshore Renewables Developments: Recommendations for Fisheries Liaison with all relevant fishing interests to ensure that they are informed of development planning, construction and maintenance activities and any items which may accentuate risk such as UXOs, unburied cables cut and weighted cables, etc (as required, in the case of exposure of cables, under Condition 5(12) of Schedules 11 and 12);
- a Fisheries Liaison Officer (FLO) will be appointed over the construction and operational phase of the project and Fishing Liaison with FLOWW Guidance (2014; 2015) adhered to; and
- information on the location of areas of cable.

4.4 Emissions to air

4.4.1 Vessel emissions associated with Rampion 2 will comply with MARPOL Annex VI requirements (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 (IAPP) certificate.

4.5 Waste management

4.5.1 Offshore waste is considered in the **Site Characterisation Report** ~~**(Document Reference: 5.2)**~~**[APP-031]** which deals with the disposal of dredged material from sandwave clearance and drill arisings from foundation installation. The Final PEMP will set out details of waste management and disposal arrangements for offshore wastes.

Wastewater discharges

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

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

4.6 Oils, Fuels and Chemical Management

4.6.1 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. RED will check these controls are in place during their inspections on site, the Final PEMP will set out details for this procedure and the frequency in which checks will be conducted.

4.6.2 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.

4.6.3 Where practical, the contractor must use products that biodegrade quickly to ensure impacts to the environment are minimized, this is a minimum standard. If a non-environmentally friendly product is proposed for use, the contractor must provide justification for that product being used.

4.6.4 Within their environmental management plans, each contractor must consider the delivery, storage and handling of hazardous materials and in particular oils and fuels, taking into consideration applicable legal requirements and best practice guidelines (for example Guidance note for the Control of Pollution (Oil Storage) (England) Regulations (Department for the Environment, Food and Rural Affairs (Defra), 2001), including (but not limited) to:

- selection of chemicals that have the lowest impact to the environment where practicable and volumes of hazardous substances stored to be limited to be fit for purpose and minimise risk;
- all contractors shall detail with their environmental management plans specific controls necessary for the delivery, storage and handling of hazardous materials relevant to their works, and in particular oils and fuels, taking into account the requirements of the Control of Pollution (Oil Storage) (England) Regulations (2001);
- oils and chemicals must be clearly labelled. A register of hazardous substances shall be kept on site, the register will include the product/substance material safety data sheets;
- storage, and use handling of chemicals in line with manufacturer's instructions / recommendations and material safety data sheets guidance, the COSHH Regulations (2002) and regulator guidance on the storage of chemicals;

- activities involving the handling of large quantities of hazardous materials, such as deliveries and refuelling will be undertaken by designated and trained personnel;
- secondary containment capacity for substances dangerous to the environment must be 110% of the largest container or 25% of the total volume of accumulated containers (whichever is greatest). Spill kits of sufficient capacity to deal with volumes stored to be fully stocked and readily available;
- vessels of more than 400 gross tonnage should maintain an oil record book and the sulphur content of fuels must comply with MARPOL (International Convention for the Prevention of Pollution from Ships) Annex VI (IMO, 1973) requirements in relation to Sulphur Emission Control Areas (SECAs) and hold a valid International Oil Pollution Prevention Certificate (IOPP); and
- recorded regular preventative maintenance shall be in place for all plant and equipment (for example, scheduled maintenance).

4.6.5 Activities involving the handling of large quantities of hazardous materials, such as deliveries and refuelling, must have a detailed Risk Assessments and Method Statement (RAMS) 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.

4.6.6 An **Outline Marine Pollution Contingency Plan** is included in this Outline PEMP as **Appendix A,** as set out in measure **C-53** of the **Commitments Register [(REP5-086]** ~~Document Reference: 7.22)~~ and as required under dML Condition 11 in Schedules 11 and 12 of the DCO.

4.6.7 The Final PEMP will include a chemical risk assessment as required as required under dML Condition 11 in Schedules 11 and 12 of the DCO.

5. Legislative and regulatory compliance

5.1.1 Rampion 2 will comply to all relevant environmental legislation and will adopt best practice measures, where practicable. Contractors working on behalf of Rampion 2 will also ensure compliance with all relevant environmental legislation and will have systems in place to ensure legislative changes are monitored and implemented.

5.1.2 UK Offshore DCO projects are granted permission to be constructed by the relevant Secretary of State, for Rampion 2 this would be the Secretary of State for the Department of Energy Security and Net Zero. Rampion 2 is applying for a dML which would be consented through the DCO.

5.1.3 Consents and licences for offshore activities may contain limits for emissions to air, discharges to land and water and working practices (such as seasonal exclusions) and may not be breached at any time. The DCO and dMLs will be the key permissions to be adhered to for offshore construction and operation of the project.

5.1.4 Rampion 2 will comply with the RWE Offshore Wind UK Legal Register. The register is monitored by the HS&E Advisor and changes in legislation and other obligations shall be communicated via updates to the Final PEMP or associated documentation.

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6. Personnel, training and induction

6.1 Training and competence

6.1.1 The Outline PEMP as certified by the Secretary of State will be incorporated into the contracts for the principal contractor(s) of all offshore works authorised by the DCO. All offshore contractors, subcontractors and their suppliers will be required to observe the relevant provisions of the Final PEMP (which will accord with the Outline PEMP, as required under dML Condition 11 in Schedules 11 and 12 of the DCO) and provide evidence on how they will ensure its requirements are implemented and monitored.

6.1.2 Compliance with this Outline PEMP and the Final PEMP will not absolve the principal contactor(s) or subcontractors from the obligation of compliance with all legislation and byelaws relating to their construction activities.

6.1.3 All offshore construction staff employed on Rampion 2 will receive training from the principal contractor(s) on their responsibilities for minimising the risk to the environment and implementing the measures set out in this Outline PEMP and the Final PEMP.

6.1.4 The principal contractor(s) will ensure that contractors employ an appropriately qualified and experienced workforce and will be responsible for identifying the training needs of their personnel. The training will include site briefings and toolbox talks as necessary to equip the workforce with the relevant knowledge on health, safety and environmental topics.

6.1.5 In addition to meeting the commitments in the Outline PEMP, all principal contractor(s) will be required to sign up to, and implement, the Considerate Contractors' Scheme (CCS). The scheme is a voluntary Code of considerate practice which seeks to minimise disturbance caused by construction sites to the immediate neighbourhood and recognises the commitment to raise standards of site management.

6.1.6 The CCS Code of Considerate Practice is in five parts, each containing an aspirational supporting statement and four bullet points which represent the basic expectations of registration with the scheme. These five parts will be applied during construction works and comprise:

- care about appearance;
- respect the community;
- protect the environment;
- secure everyone's safety; and
- value their Workforce.

Subcontractor management

6.1.7 The Final PEMP must set out how the principal contractor manages their subcontractors. This may range from the selection and assessment processes through to the assessment of performance on the vessel. For example, expectations of contractors working on behalf of RED are primarily detailed in this and the following documents:

- contract Schedules including specific environmental requirements;
- RWE / Rampion 2 Environmental Policy; and
- Rampion 2 Environmental Statement.

6.2 Leadership and commitment

6.2.1 To demonstrate and foster a culture of commitment to the HS&E policy there will be:

- sufficient resources assigned to fulfil the requirements of the Final PEMP and sub-plans;
- support provided by the consent compliance lead 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.

6.3 Environmental induction and training

6.3.1 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 Rampion 2 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 and sign off sheets for toolbox talks and other awareness programmes. Records will be managed in line with data protection legislation.

6.3.2 The HSE Induction will be integrated into the Rampion 2 induction. The HSE Induction will as a minimum include:

- RWE working on behalf of RED as development services provider adopts the RWE Renewables HSE policy statement and We Care Management System. RED Limited (board) will also have a policy statement although this is to be produced;
- the significant environmental aspects and potential impacts of their work;

- how to submit environmental improvement ideas, near misses and incidents;
- emergency response procedures;
- the implications of not complying with environmental requirements;
- environmental site rules and requirements; and

6.3.3 All RED employees, contractors and subcontractors shall complete the induction.

Vessel inductions

6.3.4 All vessel personnel must have a vessel induction that includes an environmental component. Designated personnel from the contractor's project team should be responsible for preparing and delivering the site induction and maintaining documented attendee records.

6.3.5 It is expected that the environmental management contents of vessel 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; environmental emergency response, reporting of incidents and complaints.

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7. Communication and stakeholder management

7.1.1 The offshore construction communications strategy for Rampion 2 is a fundamental component in RED's safety commitments / plan and has been built around the following fundamental principles:

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

7.1.2 To this extent stakeholders will have targeted access to information about Rampion 2, including formal and informal opportunities to find out about the planning and development phase, and to provide feedback to RED, where related activities are likely to impact on stakeholders.

7.1.3 The broader community will be kept informed of the Proposed Development through general media, including newspaper advertisements and press releases, and through the local Councils as required. Information will be shared with partner websites and journals from the RED list of sea user groups and organisations. RED will update coastal parish councils of Rampion 2 works, either via the RED Coastal Community Project Liaison Group (PLG) or directly with the parish councils.

7.1.4 Notices and posters will be produced for ports, harbours & marinas, clubs and associations, fishers and vessel owners to put up in the relevant places.

7.1.5 Stakeholders, including members of the public, will be able to contact RED by way of the direct email address, freephone or through the website contact form, which will be provided in the Final PEMP.

7.1.6 All communication will be directed to, and managed by, the RED communications team.

7.2 Internal communication

7.2.1 To ensure that the environmental requirements of Rampion 2 are met, the Consents Manager will act as a single point of contact between all internal stakeholders for all matters relating to environmental issues/consent issues respectively.

7.3 External communication (stakeholder and community)

7.3.1 The Consents Manager in consultation with the Public Relations Manager and Project Manager will ensure all relevant stakeholders are consulted at appropriate times during the pre-construction and construction phases and effective dissemination of information to the identified points of contact.

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

7.3.3 The RED Sea Users PLG will continue into construction, offering a two-way information dissemination process. The Sea Users PLG is made up of representatives from ports, harbours, marinas, yacht clubs, anglers, divers, jet skiers, Royal National Lifeboat Institution etc.

7.3.4 Communication with commercial fisheries will be conducted in accordance with the **Outline Fisheries Liaison and Co-Existence Plan** ~~**(Document Reference: 7.19**~~**[REP1-013]**~~)~~.

7.3.5 RED will appointment a Company Fishing Liaison Officer (FLO) who will communicate with fishers, vessel skippers and boat owners who may have an interest in the site. Additionally, RWE have five Fishers Working Groups who will be kept informed throughout construction.

7.3.6 RED will also appoint an Offshore Fishing Liaison Officer (OFLO) who will be located offshore, on a guard vessel, throughout much of the offshore construction phase. The OFLO will be contactable by fishers, divers, charter vessels and other sea users, and will act as a point of contact for the Rampion 2 Construction Project Management Base and ports / marinas etc along the coast.

7.3.7 Communication with the local diving community will be conducted in accordance with the **Outline Diver Communication Plan** **[APP-242]**~~(Document Reference: 7.20)~~.

7.3.8 RED will appoint a Diving Liaison Officer, to liaise with dive clubs, dive shops, dive hire, charter vessels etc.

7.4 External communication (environmental regulatory agencies)

7.4.1 Consultation with a range of environmental or other regulatory agencies may be required throughout the construction and operation of Rampion 2. The Consents Manager will consult and cooperate with all relevant regulatory agencies in meeting the environmental conditions as required under legal obligations and consents (as they become relevant).

7.5 Stakeholder requirements

Crown Estate Agreement for Lease

7.5.1 Rampion 2 will report Serious Incidents to the Crown Estate as soon as reasonably practicable and in any event, within 48 hours. Serious Incidents are defined as:

"*any fatal RIDDOR [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations] Reportable Incident or Health and Safety Incident which involves serious threat to life, harm or damage to the environment or property including but*

not limited to vehicle or vessel collisions, structural collapses, explosions or fires, releases of flammable liquids and gases, hazardous escapes of substances."

7.5.2 Reports will be made using the HSI Notification form (see **Appendix H**) via email to: HealthandSafety@thecrownestate.co.uk.

RED Shareholders / Board

7.5.3 The Shareholders of RED require the following environmental management activities:

- the provision and maintenance of this Outline PEMP; including suitable policies on environmental management; and
- production of a monthly report to include environmental performance.

7.5.4 Promptly give notice to the RED board:

- any event or circumstance which has a negative environmental impact in any material respect;
- any material health and safety incident in connection with Rampion 2;
- any material breach of any applicable Environmental Law or Social Law or any relevant environmental or health and safety policies or systems;
- any material changes to any relevant environmental or health and safety policies or systems;
- any environmental claim or social claim against or otherwise in connection with RED or Rampion 2;
- any community campaign, demonstration, or dispute in connection with Rampion 2; and
- any workforce collective action or dispute in connection with Rampion 2.

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8. Documentation and records management

8.1 Documented information

8.1.1 Rampion 2 will produce suitable and sufficient documentation to ensure that compliance to legal and other obligations, including those set within consent conditions, permits, licences and authorisations. Documentation will be produced that provides evidence of compliance against the statements written within procedures, management plans and other EMS documentation and as required by the Final PEMP.

8.1.2 As a minimum, documentation will include the title, date, author, reference number, EcoDoc number & version history. The author shall select the most appropriate format, language and media; and the documentation will be protected from damage, loss of data and breaches in confidentiality. Documents will be located conveniently for use (if applicable) for example Risk Assessments and Method Statements located at the worksite. Compliance obligations such as those within licences, may require documentation to be displayed in specific locations. If there are specific requirements for the display or access to documentation, this will be written within relevant management plans and communicated to the relevant Rampion 2 employees, contractors, or other relevant persons.

8.1.3 RED maintains all formal documentation on the Rampion 2 EcoDocs site (004778261*) and maintains a Master Document Register (MDR) of formal documentation.

8.2 Records

8.2.1 The contractor shall retain all relevant HSE records relating to its work, in line with relevant legislation RED shall be given access to these records on request. Some examples of records include:

- risk assessments;
- training records;
- evidence of consultation / communication with stakeholders;
- maintenance records (proactive & reactive);
- marine licence acknowledgement forms;
- monitoring and measuring results;
- incidents, near misses and observations;
- audit results;
- management review outputs; and

- corrective actions reports.

8.2.2 Although not an exhaustive list, this indicates the variety of records required for environmental management. The record keeper will ensure that the records are suitable and sufficient to ensure that they fulfil their purpose. This includes being completed correctly and, in the detail, necessary to fulfil the associated obligations. Records will also be stored for the length of time required by any associated obligations. Where there are no obligations for record retention, the record will be kept for the lifetime of Rampion 2 or as stated otherwise.

9. Environmental monitoring and auditing

9.1 Environmental monitoring programmes

9.1.1 An **Offshore In Principle Monitoring Plan (IPMP)** **[REP4-055]** ~~(Document Reference: 7.18)~~ is provided with the DCO Application, outlining the approach to monitoring for Rampion 2 based on the outcomes of the offshore impact assessments detailed in **Chapter 6: Coastal processes** to **Chapter 16: Marine archaeology** of the ES ~~**[APP-047 to REP3-015]**~~ ~~(Document Reference: 6.2.6 to 6.2.16).~~

9.2 Environmental auditing

9.2.1 During operation and maintenance of Rampion 2, audits of compliance obligations will be completed by the HS&E Advisor, who may be supported by a Consents Manager. Audits will:

- assess compliance with the requirements of licences and approvals that apply to the Proposed Development;
- assess the environmental performance of the Proposed Development; and
- review the effectiveness and adequacy of the environmental management of the Proposed Development.

9.2.2 **Table 9-1** outlines the environmental audit requirements at Rampion 2. Timings are determined at a minimum frequency. However, the frequency may be greater if deemed necessary by the results of previous internal/external audits, or changes to operations.

Table 9-1 Environmental audit requirements

Audit Scope	Auditor	Timing
Project compliance to the Rampion 2 EMS, including this Outline PEMP	HS&E Advisor and Consents Manager	Not less than once in a three-year period
Project compliance to a Marine Licence & other consent conditions	Consents Manager	At least once within one year of commencement of works
Project Compliance to Appendix A	HS&E Advisor and Consents Manager	Annually

9.2.3 Records of all audits and inspections undertaken will be reported to the Rampion 2 Project Manager, Assistant Project Manager and Senior Consents Manager, a summary of inspection and audit findings shall be discussed at HS&E Meetings; Management Reviews; or other HS&E forums as appropriate.

9.3 Non-Conformances and Corrective Actions

9.3.1 Corrective action will be identified for non-conformances that arise from incidents, audits and deviation from the Final PEMP.

9.3.2 Corrective action to re-establish compliance will be taken as soon as possible. The steps to corrective action will involve:

- review of the audit reports by the Project Manager or Assistant Project Manager in consultation with the HS&E Advisor / Consents Manager (as appropriate – see **Table 9-1**);
- an investigation to identify and analyses the root cause of the non-conformance; and
- development of objectives, targets and resource plans to correct or prevent the non-conformance.

9.3.3 The solution may involve remedial actions and:

- progress to KPIs;
- results of environmental monitoring;
- results of environmental audits;
- environmental incidents, near misses and observations;
- relevant communications from stakeholders such as complaints; and
- opportunities for improvement of environmental management.

10. Complaints and incident management

10.1 Complaints protocol

10.1.1 Contractors must ensure that any complaints are reported to the designated members of the Project Team and investigated promptly.

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

10.1.3 Frequent contact will be maintained with the local community to provide effective feedback in regard to perceived environmental issues.

10.2 Environmental incident response

10.2.1 All environmental incidents and near misses will be reported in accordance with the Rampion 2 Incident Reporting Process (**Appendix C**).

10.2.2 It is expected that contractors conducting works on behalf of RED will provide evidence of incident response procedures covering environmental incidents which could occur during the works. In all other circumstances the following procedures shall be

- releases of oil or hazardous substances to the marine environment (**Appendix D**); and
- dropped objects to the marine environment (**Appendix E**).

10.2.3 All environmental incidents and near misses will be recorded on the RWE Renewables Incident Reporting tool, Reporting, Incident & Audit System (RITAS). Classification of environmental incidents on RITAS, including incident escalation, investigation and lessons learned, will be conducted in line with RWE Renewables criteria outlined in the RWE Renewables HS&E Incident Management Directive (RD-361-01) and RWE Renewables HS&E Incident Severity Table (RD-361-01-A01-R02). Please see **Appendix I** for a copy of the RWE Renewables incident classification criteria.

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11. Glossary of terms and abbreviations

Table 11-1 Glossary of terms and abbreviations

Term	Definition
COSHH	Control of Substances Hazardous to Health
DCO	Development Consent Order
dML	Deemed Marine Licence
EA	Environment Agency
EMS	Environmental Management System
EPS	European Protected Species
ES	Environmental Statement
FLO	Fisheries Liaison Officer
HS&E	Health, Safety & Environment
IAPP	International Air Pollution Prevention
IMO	International Maritime Organisation
IOPP	International Oil Pollution Prevention
KPI	Key Performance Indicator
MARPOL	IMO Marine Pollution Convention
MCA	Maritime Coastguard Agency
MDR	Master Document Register
MLDIR1	Marine Licence Dropped Incident Report 1
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
OCoCP	Outline Code of Construction Practice
OSPAR	Oslo and Paris Conventions: the mechanism by which 15 Governments & the EU cooperate to protect the marine environment of the North-East Atlantic.
PEMP	Project Environmental Management Plan

Term	Definition
POLREP	Pollution Report Form
RAMS	Risk Assessments and Method Statements
RED	Rampion Extension Development Limited
RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
RITAS	Reporting, Incident & Audit System
RWE RES	RWE Renewables
SDS	Safety Data Sheet
SECA	Sulphur Emission Control Area
UXO	Unexploded Ordinance

12. References

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Appendix A
Outline Marine Pollution Contingency Plan

Introduction

This Outline Marine Pollution Contingency Plan (MPCP) provides details of procedures to protect personnel working and to safeguard the marine environment in the event of an accidental pollution event arising from offshore operations relating to Rampion 2 throughout the lifetime of the project. A Final MPCP following the framework set out in this document will be produced prior to construction.

This Outline MPCP document has therefore been drafted in order to meet embedded environmental measure C-53 of the **Commitments Register [{REP5-086~~Document Reference: 7.22~~]}**.

Vessels

A list of vessels that may be involved in construction and/or operation will be provided, and further detail will be supplied in the Final MPCP.

Rampion 2 personnel

RED recognise that it has the primary operation and financial responsibility for any oil or chemical spill originating from Rampion 2 during the lifetime of the project. However, the Principal Contractor (as defined according to the Construction (Design and Management) Regulations 2015) has Primacy in the event of an oil and/or chemical spill/ environmental incident during the offshore phase of works.

This section will outline what the Principal Contractor/s are responsible for along with their roles and responsibilities. Additionally, it will outline how the Final MPCP will be reviewed in the Operation and Maintenance phase of Rampion 2.

Roles of regulatory bodies

This section will outline the roles of regulatory bodies including the MMO marine pollution contingency advisors and applicable regulatory bodies and interest parties. Further detail will be supplied in the Final MPCP.

Pollution incidents, reports, and situation -updates will be emailed to the Natural England Marine Incidents Mailbox : marineincidents@naturalengland.org.uk.

Categorisation of incidents

Maritime and Coastguard Agency Categorisation of oil spill incidents

This section will outline the Maritime and Coastguard Agency's (MCA) three-tiered approach to describing the scale of an incident under their National Contingency Plan (MCA, 2014). Spill volume calculations will also be included, in accordance with the Bonn Agreement Oil Appearance Code (BAOAC Bonn Agreement, 2014).

Pollution Sources and Risk Assessment

This section in the Final MPCP will include the pollutant types and sources, which are dictated by the hydrocarbon and chemical inventories on the vessels and offshore installations.

Pollution from a wind farm vessel

The potential for major spills is most likely to come from construction vessels or Crew Transfer vessels. Such potential spills will be covered by a vessel's own Shipboard Oil Pollution Emergency Plans (SOPEP) which is approved by the MCA. All vessels working within the wind farm will carry a SOPEP under Regulation 26, Annex 1 of MARPOL 73/78, complete with suitable oil response equipment. This section of the Final MPCP will include assessments of the likelihood of the three different Tiers of spills.

Pollution from a wind farm structure

This section of the Final MPCP will outline the volume of pollutants from substances sealed within the Rampion 2 WTG's. Additionally, it will include assessments of the likelihood of the three different Tiers of pollutants.

Pollution arising from other vessels

This section of the Final MPCP will consider the possibility of pollution occurring from outside of the Offshore DCO Order Limits such as, in the event of two vessels colliding. This section of the Final MPCP will also include assessments of the likelihood of the three different Tiers of pollutants.

Vessel to vessel refuelling

Contractors will undertake operationally necessary refuelling at sea as required to fuel vessels that are extremely restricted in their capability to leave station to take on fuel, such as jack ups and workboats. The Merchant Shipping Notice MSN 1829 (M) Ship to Ship Transfer Regulations (2010) as amended sets out detailed requirements regarding ship-to-ship transfers of a cargo consisting wholly or mainly of oil. This section will set out where permission to refuel at sea has been obtained, and the requirements of the contractor as appropriate prior to refuelling commencing.

Response procedure

Incident management

This section of the Final MPCP will set out the procedures to be adhered to in the event of a marine pollution incident. Rampion 2 requires that any spill (actual or probable) into the marine environment, no matter how small, is responded to following the procedures which will be set out in the Final MPCP. It is a priority to prevent pollution in the first instance. Should pollution arise as a result of Rampion 2 activities, or in the vicinity of Rampion 2, then actions shall be taken to contain the pollution, and where possible, to recover the polluting substances or the source of the pollution.

Incident response structure

This section of the Final MPCP will set out the incident response structure for Rampion 2, including who has the overall responsibility for conducting spill response operations. This section will also include changes in response structure in relation to incident Tiers.

Incident response

This section of the Final MPCP will include a guide for personnel involved in spill management. Additionally, it will set out the factors that will be evaluated to assist in planning the appropriate response to an incident. These responses will be broken down and determined by the Tier system.

This section will also include an incident response matrix.

Additionally, this section of the Final MPCP will set out incident management to be followed in the event of a pollution incident both within the Offshore DCO Order Limits and outside of the Offshore DCO Order Limits.

Mobilisation

Following evaluation of the pollution incident, the Tier of incident will be established, and mobilisation of resources will commence considering factors to be detailed in the Final MPCP.

Reporting

This section of the Final MPCP will include detail of the reporting process for pollution incidents, including the notification to the MCA/ MMO.

Waste management

This section of the Final MPCP will set out waste management plans which will differ according to the Tier of the pollution incident.

Training and health and safety

This section of the Final MPCP will include a training matrix that identifies training requirements. It will also include health and safety information as any pollution incident represents a potentially hazardous environment.

Risk Assessment

A risk assessment for likely pollution sources offshore will be included in the appendices to the Final MPCP.

References

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Appendix B
RWE Renewables health safety and environmental policy

RWE

RWE Renewables Health, Safety and Environment Policy Statement

#Enjoytomorrow

As members of the RWE family, the Renewables businesses rally behind RWE's purpose: Our energy for a sustainable life. It describes why we exist and what drives us forward every day. We are passionate about renewables and the impact we create for the world. We are responsible corporate citizens and have a positive environmental, economic and societal contribution.

Health, Safety and Environmental Excellence the Cornerstone of Sustainable Performance

We believe that long-term, sustainable success can only be reached through people. We create and provide safe and healthy working conditions. We believe that all accidents are preventable and therefore, one accident is one too many. We are passionate about helping to protect our planet and are committed to support societies globally to meet the United Nations' two degree target and commit to net zero by 2040.

In short: We care for each other, our assets and the environment wherever we operate, whatever we do.

Our Care Commitments

We live the following commitments and require all colleagues and encourage all business partners to abide by these and act accordingly:

- Our management visibly demonstrates leadership in Health, Safety and Environment (HSE) throughout all our business processes, activities and decisions.
- We take decisive action to ensure and promote the health and safety of all employees, business partners and neighbours as well as to assure the protection of the environment – no matter where we are or what we do. We avoid hazards, reduce risk and continually improve our performance.
- We devote energy and attention to prevent harm, and to maintain and improve the health and wellbeing of employees, business partners and others involved with us along the value chain.
- We empower and expect our colleagues and business partners to take personal responsibility, role-model HSE and be brave by stopping unsafe work and challenging unsafe conditions.
- We appreciate and recognize good HSE behaviour and performance, strive to find safer ways of working and take pride in actively sharing good HSE practice.
- We welcome constructive feedback and challenge on the implementation of our HSE Policy.
- We take a holistic, life-cycle wide approach to environmental protection aiming at reducing environmental impacts whilst increasing the production, storage and use of green energy.
- We are committed to ensuring the integrity of our assets to increase clean energy production whilst preventing harm to people and the environment.

We care today, so everyone enjoys tomorrow

[redacted]

Sven Utermöhlen
CEO RWE Offshore Wind

Katja Wünschel
CEO RWE Renewables Europe & Australia

April 2023

rwe.com

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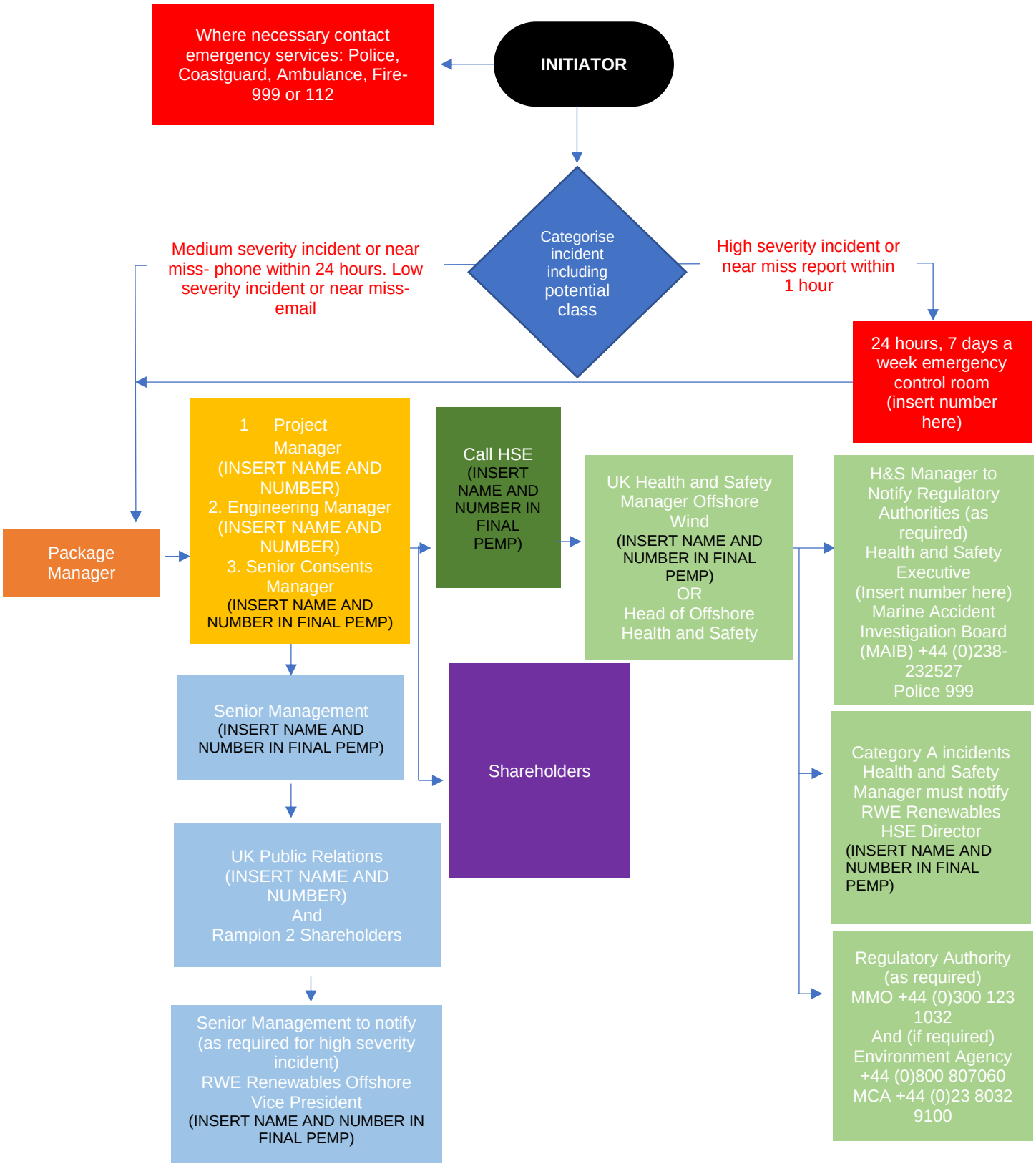
Appendix C
Rampion 2 incident reporting procedure



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Appendix D
Rampion 2 marine spill procedure

Assess Risk

- Stop marine works, remove personnel from the source of the release (if applicable), check for danger to personnel, decide if you can deal with the incident, request for further assistance if required,

Identify

- Identify spill material.
- Refer to Safety Data Sheets (SDS) for Personal Protective Equipment (PPE) requirements in accordance with COSHH.

Control

- Control the source.
- Stop the leak, close the valve, turn off the machine.

Contain

- Reduce vessel movements which could spread the spill.
- Use absorbent booms to contain the spill and further absorbent socks/pillows/pads to absorb the contained spill.

Contact

- Contact the Rampion 2 Management Team using the contact details in **Appendix C** Contact other relevant local contacts, for example: port facility, local port pollution pans may be initiated in the event of spills in a port.

Clean Up

- Remove used absorbents from the water, place into containers/bags provided with in the spill kits.
- Store and dispose of material as hazardous waste.
- Replenish spill kits.

Report

- Report in line with the requirements outlined in **Appendix C**
- If considered a 'Serious Incident' as defined by the Crown Estate, complete the HIS Notification form (**Appendix H**) and send to healthandsafety@thecrownestate.co.uk
- Complete Incident Report in **RITAS** within 24 hours where possible, and in any event within 5 days of becoming aware of the incident.
- Vessels shall complete the POLREP form (**Appendix F**) and report to the MCA Counter Pollution Officer. Tel: +44 (0) 2380 329525, +44 (0) 1304 210008. Email: dover.coastguard@mcga.gov.uk

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Appendix E
Rampion 2 dropped object procedure

Assess Risk

- Stop marine work, remove personal from any hazards in the immediate area, check for danger, decide if you can deal with the incident, request for further assistance if required.

Identify

- Identify lost object.

Notify

- Notify the vessel master and Rampion 2 Consent Manager
- Notify the MMO local and coastal offices, MCA, Trinity House, UK Hydrographic Office, Navigation Warnings, National Federation of Fisherman's Organisations, Kingfisher at Seafish (as per MLDIR1 at **Appendix G**).

Recover

- Consider whether the object can safety be recovered.
- If the object can be recovered safety, plan and risk assess, notifying other sea users if necessary for safety reasons.

Mark

- If the object can safely be recovered, identify suitable marking and lighting arrangements.
- Consult Trinity house Email: navigation.directorate@this.org and the Maritime Coastguard Agency Email: navigationalsafety@mcga.gov.uk

Report

- Report in line with the requirements outlined in **Appendix C**
- Complete Incident Report in **RITAS** within 24 hours where possible, and in any event within 5 days of becoming aware of the incident.

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Appendix F
POLREP- Pollution report form for vessels

Initial Pollution Report Format of CG77 POLREP	
A	Classification of incident (Doubtful / Probable / Confirmed)
B	Date and Time (Pollution observed / reported and identity of observer / reporter)
C	Position and extent of pollution (Latitude and Longitude where possible. State range and bearing from prominent landmark. Estimate amount of pollution, for example, extent of polluted area, number of tonnes of oil spilled, number of drums / containers lost).
D	Tide and wind (Speed and direction)
E	Weather (Conditions and sea state)
F	Characteristics of pollution (Type of pollution, for example: liquid, floating solid, semi liquid, discolouration of sea, visible vapour etc.)
G	Source and cause of pollution (From vessel or other source. If vessel state whether deliberate discharge or casualty (give details). Where possible give name, type, size, nationality, and Port of Registry of polluting vessel. If relevant give course, speed and destination.)
H	Vessels in area (If polluter cannot be identified give details of possible polluting vessels.)
I	Records (State whether photographs have been taken, or samples for analysis)

Initial Pollution Report Format of CG77 POLREP		
J	Remedial action Describe action taken or intended to deal with spillage.	
K	Likely effect of pollution (for example: arrival on beach/landfall with estimated timing).	
L	Names Record organisations/contacts who have been informed.	
M	Other (for example: names of other witnesses, references to other instances of pollution pointing to source).	
Print Name:		Job Title:

Appendix G
Marine licence dropped incident report- MLDIR1

MMO pro-forma for reporting the loss or dumping of synthetic materials and other refuse at sea.

Forward to the MMO within 24 hours where possible, and in any event within five days of becoming aware of loss or dumping incident:

MMO Marine Licensing	[redacted]
MMO Local Office (Shoreham)	[redacted]
Maritime & Coastguard Agency	[redacted]
Trinity House	[redacted]
UK Hydrographic Office	[redacted]
Navigational Warnings	[redacted]
National Federation of Fisherman's Organisations	[redacted]
Kingfisher at Sea fish	[redacted]

Identity of Reporter

Full Name:	Date of Report:
Company:	Position/ Title:
Marine Licence/ DCO Ref:	
Operator/Organisation/Company responsible for incident:	
Name of Installation or Vessel responsible for the loss or dumping of the material:	
Location/position of the installation/vessel at the time of the loss or dumping:	Quad and Block Number:

Latitude (WGS84 DDD MM.MMM):	Longitude (WGS84 DDD MM.MMM):
Date of Loss/Dumping:	Time (24hours):
Weather conditions at time of loss/dumping:	Depth of Water (metres):
Wind Direction (0-360 degree):	Wind Speed (knots):
Beaufort Scale:	Wave Height (metres):
Tide rate:	Tide direction:
Number of hours before or after High Water item was lost:	
Materials lost or dumped provide as full a description as possible –i.e., clearly highlight if synthetic materials involved, are there wires involved, dimensions of materials etc – If photo's available please attach separately. Specify the purpose of the function of the materials:	
Dimensions of object:	
Estimated clearance over object (including calculation methodology):	
If the materials are resting on the seabed are they lying wholly within the 500m Safety Zone?	☐ Yes ☐ No
If the materials are resting on the seabed are they lying wholly within	☐ Yes ☐ No

the 500m Safety Zone? Yes or No: Are the materials likely to float on sea surface or in water column?
If the answer to question above is YES - are materials likely to reach shore or cross a median line? - please specify
Reasons the loss or dumping (if Force Majeure is invoked please clearly state this):
Are there plans to recover the materials? – If yes, specify details including anticipated timescales for the recovery operation. If there are no plans to recover the materials the reason for this must be clearly specified. Please detail if any further consent is required to undertake remediation action.
Please provide details of any interim mitigation measures put in place to deal with immediate risks to navigation:
Details of any radio Navigational Warnings and/or Notices to Mariner's:
What are considered to be the risks and dangers to other users of the sea as a result of the lost or dumped materials not being recovered?
Any further information that may be useful:

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Appendix H
Crown Estate HSI notification form

Details of business or undertaking notifying the incident: Rampion 2 Offshore Wind Farm	
Legal name of business:	
Name of site:	
Business address:	
Contact phone number:	
Business email address:	
Incident Details	
This is to notify of:	☐ Serious Incident ☐ Non-Fatal RIDDOR Reportable Incident
Provide a brief explanation of the type of Incident (i.e) fall from height, vessel collision):	
Incident date, time and location:	
Date: **Time:** **Location:**	
Description of the incident. Please provide as much detail as possible:	

Details of business or undertaking notifying the incident: Rampion 2 Offshore Wind Farm	
Do you propose to release a press/public statement in connection with the incident?	
☐Yes	☐ No
Notifier's Details	
☐ Mr **☐ Mrs** **☐ Miss** **☐ Ms** **☐ Other, please state:**	Name and Surname:
Position at workplace:	Contact number:
Email:	
Are you the person who should be contacted for further information? **☐ Yes** **☐ No (If not please fill in the section below)**	
Appropriate Person be contacted for further information (if other than yourself):	
☐ Mr **☐ Mrs** **☐ Miss** **☐ Ms** **☐ Other, please state:**	Name and Surname:
Position at workplace:	Contact number:
Email:	

Appendix I
RWE Renewables incident classification

Actual Classification		Actual Severity (0= near misses/ no actual harm)		
		HIGH (AH)	**MEDIUM (AM)**	**LOW (AL)**
HS	Harm to people	Fatality, major life changing injury, or serious long-term (reversable) injury.	Lost Time Injury (LTI) Restricted Work Case (RWC) Medical treatment Case (MTC)	First Aid Case (FAC)
Asset	Damage/ Business Continuity	Incident that causes downtime and/or damage costing over 1M£	Incidents that cause downtime and/or damage costing between 200k£ and 1M£	Incidents that cause downtime and/or damage costing less than 200k£
E	Environmental Damage	Serious or Major environmental Incident: • Serious environmental damage, which is expected to last longer than four weeks of remediation activities at site or cannot be remediated and therefore causes long term damage; and/or • Regional, national or international media interest; and/or • High stakeholder concern (multiple complaints); and/or • Civil or criminal prosecution	Moderate environmental incident: • Moderate environmental damage that is expected to be resolved within a period of (maximum) 4 weeks remediation activities at site; and/or • Local media interest; and/or • Moderate stakeholder concern (Repeat community complaints); and/or • Regulatory enforcement action (for example: Fine, notice, order)	Minor environmental incident: • Minor environmental damage that is likely to be remediated by simple means within a period of (maximum) 7 days of remediation activities at site; and/or • Action/ control required; and/or • Warning letter from authority; and/or • Low stakeholder concern (isolated community complaint)
Potential Classification		**Potential Severity**		
		HIGH (PH)	**MEDIUM (PM)**	**LOW (PL)**

After classifying the actual severity based on the actual and expected harm and damage, the potential severity is estimated. Therefore, a realistic deterioration of actions or conditions along with the incident's scenario are assumed, and the potential harm and damage estimated, using the same table above as for the actual severity. Note: Limit the total number of deteriorations of actions or conditions to one or two, thus realistic scenarios. Archive a credible outcome rather than a worst-case scenario.

Notification		Actual HIGH	Actual MEDIUM and/or Potential HIGH	Other Classifications
Notification	Phone	Immediate information (<1 hour) by phone	/	/
		Note: Hereby the responsible line manager aware of the incident calls his line manager and in addition the responsible HSE manager. From now onwards, both lines cascade upwards by phone through the operational line (N-3/N-2/N-1) towards the line responsible RWE RES Board member as well as through the HSE line (N-3/N-2/N-1) towards the CEO. In case a person in a line cannot be reached by phone, his replacement or the next higher person in line is called.		
	Email	Formal notification via email within 1 calendar day (including non-working days)	Formal Notification via Email within 3 working days	/
		Note: Send either the MS word or MS outlook 'incident Notification Form' to: [INSERT CONTACT EMAIL IN FINAL PEMP]. Hereby the recipient automatically copies the notification to all recipients, recorded on its predefined distribution list.		
Reporting	IT System	Reporting via the IT System as soon as reasonably practical	Reporting via the IT System as soon as reasonably practical	Monthly reporting via the IT System

Investigation		Actual HIGH or Potential HIGH	Actual MEDIUM or Potential MEDIUM	Other Classifications
Investigation	**Type of investigation**	RCA	Investigation following RCA principles but reducing effort	Moderate incident review
	Minimum desired investigation depth	Cause level 3 (root cause)	Cause level 2	Cause level 1
	Investigation start	As soon as possible	As soon as practical	Within 4 weeks
	Investigation deadline	30 days after the incident	30 days after investigation start	/
	Investigation ToR and team composition	Responsible Board Member (supported by HSE Head)	Responsible N-1 (supported by HSE Manager)	/
	Investigation Lead	N-2 or N-1 (preferably from a different BU)	N-2/N-3	Responsible line manager
	Investigation Team	Min. 3 people with adequate knowledge and skill	Min. 2 people with adequate knowledge and skill	/
	Recommended RCA Expertise in the team	RCA Advanced, preferably RCA Professional	RCA Advanced	/
	Recommended coaching/ reviewing	Independent HSE manager/ RCA Advanced or Prof.	HSE manager/ RCA Advanced if considered to be reasonable	/
Documentation and Communication	**Report scope and content**	Report (incident description, causes and recommendations)	Short summarising report or LL	Memo/ Inspection protocol
	Categorisation of Causes	According to the 'RCA-list of causes'	According to the 'RCA-list of causes'	/
	Recipient of report	Responsible Board member	Responsible N-1	/
	Investigation close-out	F2F Handover	F2F handover or via email and phone	/
	Action plan, tracking, effectiveness checks	Responsible N-1 (supported by HSE manager)	Responsible N-1 (supported by HSE manager)	Responsible line manager
	Lessons learned	SCI-Distribution/ Intranet	SCI-Distribution/ Intranet	Rarely
Deviations from the above may be made, if there are good reasons for example: to stop an investigation it is foreseeable that the investigation would not add any value or gain new knowledge, or to use a higher investigation standard as it is more appropriate although not required. Whenever stopping or deviating to a lower standard, the management of the OU concerned consult the respective HSE manager, define and agree the requirements deviation and document the deviation including reasons.				

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Appendix J Marine Biosecurity Plan

To be included in the Final Project Environmental Management Plan

Rampion 2
WIND FARM