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MORGAN OFFSHORE WIND PROJECT: GENERATION ASSETS

Outline Offshore Environmental Management Plan

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Image of an offshore wind farm

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Morgan Offshore Wind Limited.

Contents

Figures

Tables

Glossary

Term	Meaning
Applicant	Morgan Offshore Wind Limited.
Development Consent Order (DCO)	An order made under the Planning Act 2008 granting development consent for a Nationally Significant Infrastructure Project (NSIP).
Environmental Impact Assessment (EIA)	A statutory process by which certain planned projects must be assessed before a formal decision to proceed can be made. It involves the collection and consideration of environmental information, which fulfils the assessment requirements of the EIA Directive and EIA Regulations, including the publication of an Environmental Statement.
Environmental Statement	The document presenting the results of the Environmental Impact Assessment (EIA) process for the Morgan Offshore Wind Project: Generation Assets.
Marine licence	The Marine and Coastal Access Act 2009 requires a marine licence to be obtained for licensable marine activities. Section 149A of the Planning Act 2008 allows an applicant for a DCO to apply for a 'deemed marine licence' as part of the DCO process.
Morgan Array Area	The area within which the wind turbines, foundations, inter-array cables, interconnector cables, scour protection, cable protection and offshore substation platforms (OSPs) forming part of the Morgan Offshore Wind Project: Generation Assets will be located.
Morgan Offshore Wind Project: Generation Assets	This is the name given to the Morgan Generation Assets project as a whole (includes all infrastructure and activities associated with the project construction, operations and maintenance, and decommissioning).

Acronyms

Acronym	Description
ADD	Acoustic Deterrent Device
CFLO	Company Fisheries Liaison Officer
CRA	Chemical Risk Assessment
DCO	Development Consent Order
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ES	Environmental Statement
FLCP	Fisheries Liaison and Coexistence Plan
INNS	Invasive Non-Native Species
MARPOL	International Convention for the Prevention of Pollution from Ships.
MCA	Maritime and Coastguard Agency
MHWS	Mean High Water Springs
MMO	Marine Mammal Observer
MPCP	Marine Pollution Contingency Plan

1 INTRODUCTION

1.1 Purpose

1.1.1.1 This Outline Offshore Environmental Management Plan (EMP) has been prepared by Morgan Offshore Wind Limited (the Applicant) for the construction and operations and maintenance phases of the Morgan Offshore Wind Project: Generation Assets (hereafter referred to as the Morgan Generation Assets). The purpose of this Outline Offshore EMP is to provide an outline of the post-consent approach to environmental management for the Morgan Generation Assets.

1.1.1.2 The purpose of the Offshore EMP is to provide a consolidated document which encompasses the various environment and consents commitments made by the Applicant for the construction and operations and maintenance phases during the application phase, to enable efficient management and dissemination of these requirements. It will provide a framework through which the potential environmental impacts associated with the Morgan Generation Assets activities are managed.

1.1.1.3 As set out in Schedules 3 and 4, Part 2, condition 20(1)(e) of the deemed Marine Licences within the draft Development Consent Order (DCO) (REP3-013), the Offshore EMP will include details of:

- A Marine Pollution Contingency Plan (MPCP) to address the risks, methods and procedures to deal with any spills and collision incidents during construction and operation of the authorised scheme in relation to all activities carried out
- A Chemical Risk Assessment, including information regarding how and when chemicals are to be used, stored and transported in accordance with recognised best practice guidance
- Waste management and disposal arrangements
- The appointment and responsibilities of a fisheries liaison officer
- A Fisheries Liaison and Coexistence Plan (FLCP) (which accords with the outline fisheries liaison and coexistence plan) to ensure relevant fishing fleets are notified of commencement of licensed activities pursuant to condition 15 and to address the interaction of the licensed activities with fishing activities
- Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels
- Measures to minimise the potential spread of Invasive Non-Native Species (INNS).

1.1.1.4 The Offshore EMP will be submitted to and approved in writing by the MMO, prior to commencement of construction, in consultation with relevant stakeholders.

1.1.1.5 This Outline Offshore EMP has been prepared in accordance with the following industry guidance. A full list of relevant legislation and guidance will be provided within the final Offshore EMP submitted post-consent.

- Institute of Environmental Management and Assessment (IEMA) Guidance on Environmental Management Plans (IEMA, 2008).
- Maritime and Coastguard Agency (MCA), Offshore Renewable Energy Installations: Requirements, guidance and operational considerations for SAR and Emergency Response (MGN 654 Annex 5) (MCA, 2024).

- Department for Environment, Food and Rural Affairs (Defra) Guidance on applying the waste hierarchy (Defra, 2011).
- The Crown Estate's Protocol for offshore archaeological discoveries (The Crown Estate, 2014).

1.1.1.6 The Offshore EMP will provide:

- **A practical tool** for managing the potential environmental impacts of the Morgan Generation Assets
- **Guidance** on how to prevent and/or mitigate potential environmental impacts as assessed within the Environmental Impact Assessment (EIA)
- **A framework** for measuring and improving project environmental performance.

1.1.1.7 The Offshore EMP will form the minimum standard for all personnel and contractors to comply with. Contractors must take account of the requirements contained within the Offshore EMP when developing their task-specific Method Statements and EMPs.

1.1.1.8 The final Offshore EMP will be prepared and submitted to the Marine Management Organisation (MMO) for approval post-consent, as secured in Schedules 3 and 4, Part 2, condition 20(1)(e) of the deemed Marine Licences within the draft DCO (REP3-013).

1.2 Scope

1.2.1.1 The remit of the Offshore EMP is for the Morgan Generation Assets construction and operations and maintenance phase. The Offshore EMP is applicable to all Morgan Offshore Wind Limited personnel and contractors carrying out construction and operations and maintenance activities.

1.3 Document structure

1.3.1.1 This Outline Offshore EMP is presented in three parts:

- **Part I – Management, implementation and communication:** provides information on how the Offshore EMP will be managed and implemented, including roles and responsibilities and lines of communication.
- **Part II – Commitments register:** sets out the potential environmental impacts of the Morgan Generation Assets as identified in the EIA with related control measures and environmental commitments.
- **Part III – Annexes:** includes Annexes which form part of the Offshore EMP, including:
  - Annex A: Marine Pollution Contingency Plan
  - Annex B: Chemical Risk Assessment
  - Annex C: Waste management and disposal arrangements
  - Annex D: Fisheries Liaison and Coexistence Plan
  - Annex E: Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels
  - Annex F: Measures to minimise the potential spread of Invasive Non-Native Species (INNS)
  - Annex G: Dropped Object Procedure Form.

2 PROJECT DESCRIPTION

2.1 Project overview

2.1.1.1 The Morgan Array Area is 280 km^2 in area and is located 22.22 km (12 nm) from the Isle of Man coastline, 37.13 km (20.1 nm) from the northwest coast of England and 58.5 km (31.6 nm) from the Welsh coastline (Anglesey) (when measured from Mean High Water Springs (MHWS)). The Morgan Array Area is located wholly within English offshore waters (beyond 12 nm from the English coast) (Figure 2.1). The offshore infrastructure will comprise of up to 96 wind turbines, up to four offshore substation platforms (OSPs), up to 60 km of interconnector cables and up to 390 km of inter-array cables.

2.1.1.2 Offshore construction is planned to commence in 2026 for a duration of up to four years, with the project expected to be fully operational by 2030. The Morgan Generation Assets will have a lifetime of 35 years.

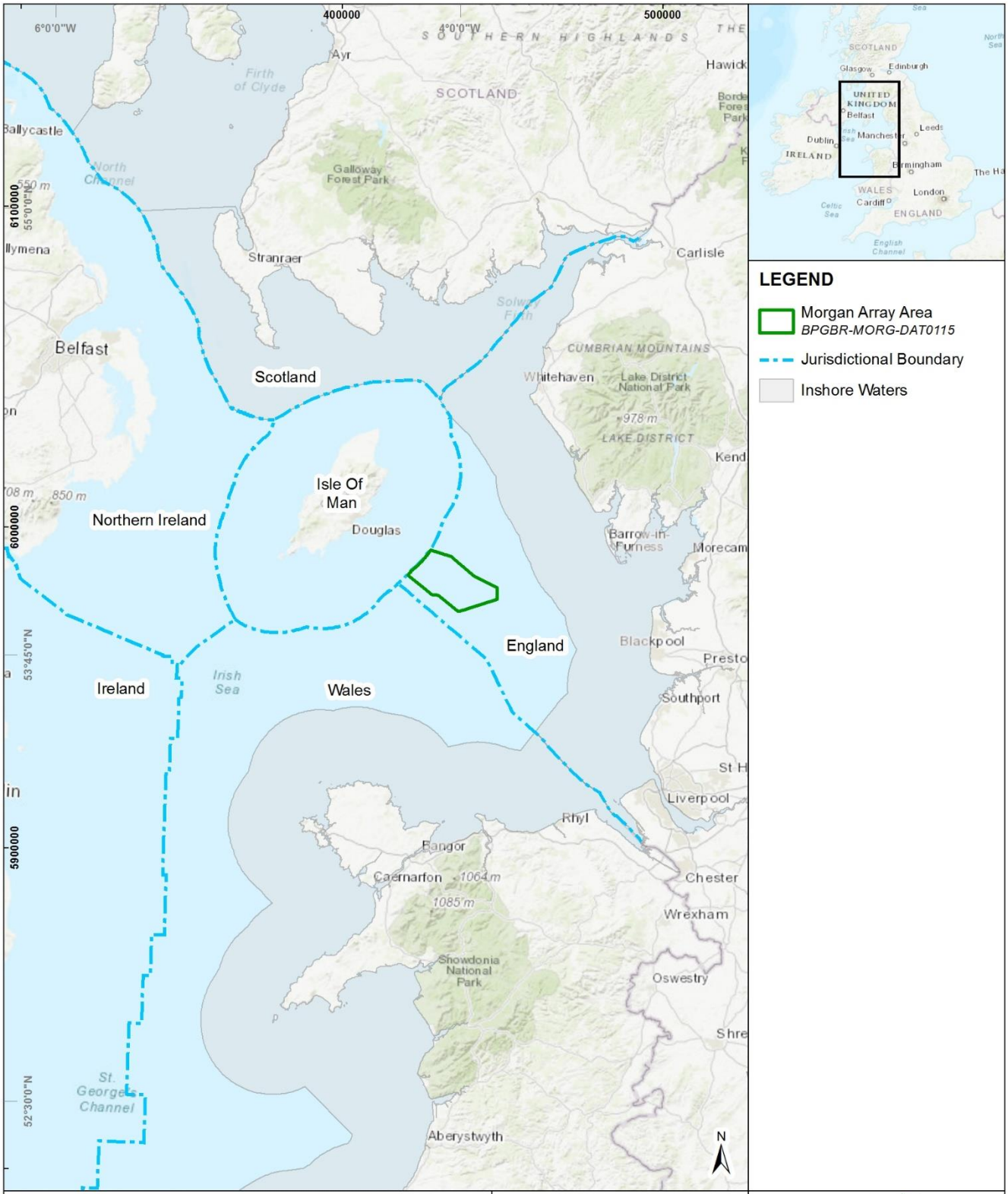

Figure 2.1: Project overview – Morgan Generation Assets location.

3 PART I: MANAGEMENT, IMPLEMENTATION AND COMMUNICATION

3.1 Roles and responsibilities

3.1.1 Overview

3.1.1.1 This section of the Offshore EMP will set out the roles and responsibilities of all relevant project personnel in relation to the Offshore EMP. Roles and responsibilities will be defined in the final version of the Offshore EMP prepared post-consent, with example roles including the following:

- Incident Manager
- Health, Safety and Environment (HSE) Manager
- Environmental Manager
- Marine coordinator
- Contractors
- Subcontractors
- Company Fisheries Liaison Officer (CFLO).

3.1.1.2 All Morgan Offshore Wind Limited personnel and contractors will have a responsibility to comply with the requirements of the Offshore EMP. The key roles identified above will be further described in the sections below, with contact details provided in section 3.1.4.

3.1.2 Key roles relating to environmental management

Incident Manager

3.1.2.1 To include the role and key responsibilities of the Incident Manager.

Health, Safety and Environment (HSE) Manager

3.1.2.1 To include the role and key responsibilities of the HSE Manager.

Environmental Manager

3.1.2.2 To include the role and key responsibilities of the Environmental Manager.

Marine coordinator

3.1.2.3 To include the role and key responsibilities of the Marine Coordinator.

Contractors

3.1.2.4 To include the role and key responsibilities of contractors.

Subcontractors

3.1.2.5 To include the role and key responsibilities of subcontractors.

3.1.3 Supporting environmental roles

Company Fisheries Liaison Officer (CFLO)

3.1.3.1 To include the role and key responsibilities of the CFLO. This section will also provide cross reference to the roles and responsibilities set out within the Outline fisheries liaison and co-existence plan (REP3-021, S_D4_13 Outline fisheries liaison and co-existence plan).

Archaeological contractor

3.1.3.2 To include the role and key responsibilities of the archaeological contractor.

3.1.4 Key contact details

3.1.4.1 This section will provide a table of contact details for the key roles above.

3.2 Communications and reporting

3.2.1 Internal communications

3.2.1.1 This section will outline and illustrate the lines of communication between the different roles with respect to delivery of the Offshore EMP.

3.2.2 External communications

3.2.2.1 The Applicant will carry out external communications, notifications and reporting in relation to Morgan Generation Asset activities in line with the environmental commitments made in the Environmental Statement and in compliance with the requirements of the deemed Marine Licences within the draft DCO (REP3-013).

3.2.2.2 These requirements will be set out in a table, to include notification of vessels and contractors to the MMO, issue of Notices to Mariners, and reporting of spills and dropped objects.

3.2.3 Incident reporting

Environmental incidents

3.2.3.1 For spill/pollution reporting procedures, refer to the Marine Pollution Contingency Plan provided in Part III, Annex C.

3.2.3.2 This section will provide a procedure to be followed in the event of an environmental incident (excluding marine pollution incidents).

3.2.3.3 If Morgan Offshore Wind Limited personnel and contractors identify or become aware of an environmental incident, they shall notify the Incident Manager as soon as practical. The incident will be reported in the first instance to the Incident Manager who will be available 24/7. They will obtain full details of the incident, discuss and agree any immediate corrective actions with Morgan Offshore Wind Limited personnel and/or contractors, and subsequently prepare an incident report.

3.2.3.4 The Environmental Manager shall inform the MMO of any incidents, providing the incident report when available, and liaising with the MMO on actions to be taken.

3.2.3.5 The Environmental Manager shall work with Morgan Offshore Wind Limited to review and update procedures as necessary to prevent similar incidents from reoccurring.

Dropped objects

3.2.3.6 All dropped objects will be recorded and reported to the MMO using the Dropped Object Procedure Form. An indicative form is included in Annex G of the Outline Offshore EMP. The final form format will be agreed with the MMO prior to commencement of construction activities.

3.3 Training, auditing and change management

3.3.1 Competence, training and awareness

3.3.1.1 Morgan Offshore Wind Limited will ensure that contractors have appropriate environmental management procedures in place. The Environmental Manager will evaluate contractor tender responses in relation to compliance with environment and consents requirements and will review appointed contractor documentation (e.g. Method Statements and Risk Assessments and contractor specific EMPs) to ensure compliance with this overarching EMP.

3.3.1.2 The key tools available to the Environmental Manager for delivering training and promoting awareness in relation to environmental management issues are:

- Inductions
- Toolbox Talks
- Awareness materials.

3.3.1.3 The Environmental Manager will ensure that a dedicated section is included within wider contractor project inductions to cover environment and consents issues, highlighting the key environmental sensitivities and considerations. All Morgan Offshore Wind Limited personnel and contractors will receive a Project induction.

3.3.1.4 The Environmental Manager will also deliver specific training on the purpose, requirements and procedures of this Offshore EMP and associated Annexes, through a series of inductions, workshops and communication campaigns.

3.3.1.5 The Environmental Manager will prepare a series of awareness materials, which may include training packs, posters, signs and newsletters. For example, posters on specific procedures can be displayed on notice boards in the site office and on contractor vessels.

3.3.1.6 Training will take place regularly throughout the lifetime of the Morgan Generation Assets in order that Project personnel (including any new personnel) are kept up to date with any changes to requirements or procedures. A record of the training will be maintained by the Environmental Manager.

3.3.2 Monitoring and audits

3.3.2.1 A primary compliance monitoring tool available to the Environmental Manager is the Morgan Generation Assets Commitments Register (Part II of this Outline Offshore EMP). The Commitments Register provides a log of all environmental commitments made during the EIA consenting process to be adhered to throughout the construction and operations and maintenance phases of the Morgan Generation Assets, where applicable. The purpose of the Environmental Commitments Register is to provide a tool intended for use by Morgan Offshore Wind Limited to track compliance with

Environmental commitments and to provide a record and audit trail of compliance. The Environmental Manager will maintain the Commitments Register throughout the lifetime of the Morgan Generation Assets, recording the status of each item, with reference/links to corresponding evidence of compliance.

3.3.2.2 Compliance with this Offshore EMP will be monitored through a series of audits carried out by the Environmental Manager. This will involve auditing against environmental protocols including worksite visits and interfaces with project personnel. The Environmental Manager will develop specific audit checklists, informed by review of this Offshore EMP and from the relevant contractor Risk Assessments and Method Statements, to facilitate the audit process.

3.3.2.3 Details and findings of all monitoring and audit activities will be recorded. Any observations or corrective actions arising from audits and inspections will be addressed, with procedures updated in this Offshore EMP as required (refer to section 3.3.3 below).

3.3.3 Review and change management

3.3.3.1 This Offshore EMP will be regularly reviewed by Morgan Offshore Wind Limited over the lifetime of the Morgan Generation Assets. Morgan Offshore Wind Limited will update the Offshore EMP when any significant new information, methods, procedures or good practice becomes available. The Offshore EMP will also be updated in response to any findings or lessons learned.

3.3.3.2 This section will set out a change management procedure. Such a procedure is recommended in the IEMA Practitioner Guide (IEMA, 2008). Following notification of a change, the Environmental Manager will initiate a process of assessment of potential impacts and, if necessary, update the Offshore EMP, and ensure that updates are disseminated appropriately to Morgan Offshore Wind Limited personnel and contractors. The Environmental Manager will maintain a record of changes and the review process. The updated Offshore EMP will be submitted to the MMO for approval.

4 PART II: ENVIRONMENTAL COMMITMENTS

4.1.1.1 In this section of the Offshore EMP, the environmental commitments made during the Morgan Generation Assets application process will be translated (from the Commitments Register (S_D4_16 Commitment Register) into an appropriate format, allowing the practical implementation of all relevant environmental commitments by contractors and subcontractors. This follows the IEMA Practitioner Guide, which states that "*the overall objective of an EMP is to provide a continuous link or 'bridge' between the design phase of a Proposed Development, conditions attached to consents, construction, and into the operational phase*" (IEMA, 2008).

4.1.1.2 As such, all environmental commitments made during the consenting process will be implemented through the Offshore EMP.

5 PART III: ANNEXES

5.1 Annex A: Marine pollution contingency plan

5.1.1 Introduction

Purpose

5.1.1.1 This Outline Marine Pollution Contingency Plan (MPCP) provides an outline of the contents of the Morgan Generation Assets MPCP which will contain the pollution response arrangements for the Morgan Generation Assets during the construction and operations and maintenance phases.

5.1.1.2 The MPCP should be read and understood by all Morgan Offshore Wind Limited personnel and contractors associated with Morgan Generation Assets activities.

5.1.1.3 Where a pollution incident is part of a wider emergency (e.g. fire or explosion), reference should also be made to the Morgan Offshore Wind Limited Incident Management Plan.

5.1.1.4 Vessel contractors are also expected to implement their own specific Ship-board Oil Pollution Emergency Plans (SOPEPs) if applicable under the MARPOL Convention, or equivalent vessel-specific spill plans in the event of a spill.

5.1.1.5 As set out in MCA (2024), 'the onus is on the polluter to manage an appropriate response. This requires an assessment to be made and then a response implemented'.

Scope

5.1.1.6 The remit of this Outline MPCP is for the Morgan Generation Assets and covers Morgan Offshore Wind Limited operations seaward of mean high water springs (MHWS).

5.1.1.7 The MPCP will focus on spills which are operational in nature and occur near Morgan Offshore Wind Limited's own facilities as a consequence of their own operational activities and are responded to with Tier 1 resources. Reporting procedures for spills requiring Tier 2 and Tier 3 resources are also set out in this MPCP.

Document revision

5.1.1.8 The MPCP will be reviewed by Morgan Offshore Wind Limited on a regular basis. An updated MPCP will be submitted to the MMO for approval whenever Morgan Offshore Wind Limited becomes aware of the need for a material update.

5.1.2 Roles and responsibilities

5.1.2.1 This section of the MPCP will set out the roles and responsibilities of all relevant project personnel in relation to the MPCP. Roles and responsibilities will be defined in the final version of the MPCP prepared post-consent, with example roles including the following:

- Morgan Offshore Wind Limited
- Vessel contractors
- Spill response contractor

- Marine Management Organisation (MMO)
- Maritime and Coastguard Agency (MCA).

5.1.2.2 All Morgan Offshore Wind Limited personnel and contractors have a responsibility to comply with the requirements of the MPCP. The key roles identified above will be further described further below, with contact details provided.

Morgan Offshore Wind Limited

5.1.2.3 For marine pollution incidents originating from Morgan Generation Assets activities, Morgan Offshore Wind Limited is responsible for:

- Developing and maintaining this MPCP
- Managing an ongoing spill response within the scope of the experience and expertise of those in command and control
- Activate escalation process and manage interface arrangements if required
- Liaising with statutory bodies
- Delivering training
- Promoting awareness.

Vessel contractors

5.1.2.4 All contractors engaging in offshore work at the Morgan Generation Assets shall be made familiar with this MPCP and the procedures within it before commencing work.

5.1.2.5 In the event of a marine pollution incident from a contractor's vessel, the vessel crew has responsibility for implementing the Ship-board Oil Pollution Emergency Plan (SOPEP) or equivalent vessel-specific spill plan, and for implementing the reporting and response procedures outlined within this MPCP.

Spill Response Contractor

5.1.2.6 Morgan Offshore Wind Limited will have Tier 1 resources available on site for spill response (refer to section 5.1.5 for a description of response Tiers).

5.1.2.7 As set out in MCA (2024), 'best practice would be for the [offshore renewable energy development] ORED to have an accredited oil spill response organisation contracted to be able to respond if required'. Morgan Offshore Wind Limited will consider the appointment of a spill response contractor as a contingency for the unlikely event of a Tier 2/3 spill.

Marine Management Organisation

5.1.2.8 The MMO is responsible for the approval of oil spill treatment products (OSTPs) in English waters. In the event an oil spill dispersant is proposed for use in an offshore pollution response situation, approval for such use must first be sought from the MMO.

Maritime and Coastguard Agency

5.1.2.9 The MCA is designated as the United Kingdom Competent Authority for counter pollution response at the national level and is the custodian of the National Contingency Plan (NCP) which includes arrangements for dealing with pollution, or the

threat of pollution, from shipping and offshore installations. If the NCP is activated by the MCA, a response becomes a Tier 3 incident by default.

5.1.2.10 As set out in MCA (2024), 'if required, the MCA can support the ORED where resources cannot be deployed rapidly'.

5.1.3 Potential spill sources and control measures

Potential spill sources

5.1.3.1 Potential spill scenarios are dictated by the oil products and chemical inventories associated with the Morgan Generation Assets and associated vessels and helicopters. The inventories for the Morgan Generation Assets (including products such as gearbox oil, coolant, hydraulic oil, as relevant) will be presented in a table in this section.

5.1.3.2 For offshore wind developments, spills are most likely to occur during transfer of oil products and chemicals offshore, during refuelling operations, during activities associated with the replacement of consumables, or in the event of a leak within the structures on site. In practice, due to precautions taken such as operating procedures, training and competence programmes, the majority of spills that may occur from Morgan Generation Assets activities are likely to be small.

Control measures

5.1.3.3 Potential spill risks and control measures from Morgan Generation Assets activities will be identified.

5.1.4 Response procedures and checklists

5.1.4.1 This section of the MPCP will provide guidance on the reporting and response actions in the event of an oil and/or chemical spill originating from Morgan Generation Assets activities.

5.1.4.2 As set out in MCA (2024), the MPCP should take account of the following:

- The response system should cover 24 hrs/365 days a year
- A clear method of authorising a response
- Call out procedures for response personnel
- Mobilisation of appropriate equipment and travel time to the spill location should be realistically achievable.

Reporting requirements

5.1.4.3 This section will set out the reporting requirements in the event of a spill associated with Morgan Generation Assets operations.

5.1.4.4 It should be noted that all pollution incidents to sea from the Morgan Generation Assets must be notified to HM Coastguard (MCA, 2024).

5.1.4.5 Example procedures are set out below.

Initial Notification to Marine Coordinator and HM Coastguard

5.1.4.6 The Spill Observer shall notify the Marine Coordinator. The Marine Coordinator shall then notify HM Coastguard.

5.1.4.7 If the spill originates from a vessel, or from operations taking place on a vessel, the Spill Observer shall report it directly to the Vessel Master. The Vessel Master shall then notify the Marine Coordinator. The Vessel Master shall also notify HM Coastguard by VHF radio.

5.1.4.8 These are the initial notifications that will be made in the event of a marine pollution incident.

Subsequent Notifications

5.1.4.9 Further notification responsibilities are summarised in the Communications Flowcharts and Response checklists sections below.

Statutory Reporting Requirements

5.1.4.10 In the event of a marine pollution incident, there is a statutory duty to report it to the MMO. The Incident Manager, on being notified of an incident, shall notify the MMO that there has been a marine pollution incident as soon as possible. Morgan Offshore Wind Limited shall make a formal report to the MMO using the Spill Reporting Form in Appendix E within 12 hours of the incident occurring.

5.1.4.11 Notification to HM Coastguard is to be undertaken as follows (MCA, 2024):

- Via renewables@hmcg.gov.uk and the relevant zone address – if the spill is less than 1 metric tonne and is not ongoing
- Via telephone in the first instance, then backed up by email to renewables@hmcg.gov.uk and the relevant zone address – if the spill is ongoing, is over 1 metric tonne in quantity, is within a sensitive area (e.g. as assessed within the MPCP) or otherwise be of a significant nature (e.g. debris from a turbine fire)
- Spills from vessels will be reported as per the shipboard oil pollution emergency plan (SOPEP).

5.1.4.12 Pollution incidents, reports and situation updates should also be notified to:

- The Natural England Marine Incidents Mailbox [redacted]
- Other relevant Statutory Nature Conservation Bodies (SNCBs)
- Relevant local authorities/jurisdictions (including Isle of Man Territorial Seas Committee where applicable).
- Oil spill/emergency response contractor(s)
- Relevant onshore and offshore emergency contacts
- Neighbouring installations.

5.1.4.13 Full contact details will be provided within Appendix J – Contacts Directory of the final Offshore EMP to be submitted post-consent.

Communications flowcharts

5.1.4.14 This section will provide the communications flowcharts to be followed by Morgan Offshore Wind Limited for marine pollution incidents.

Response checklists

5.1.4.15 Key actions and notifications for Morgan Offshore Wind Limited personnel will be provided in this section. This will include the key personnel, a description of their role, and the relevant checklists each role should follow. Example templates are provided below and will be further developed post-consent, once full details of the roles and contractors are available.

Spill Observer	**Checklist A**	The Spill Observer is the first person sighting the pollution incident and has responsibilities for reporting it, and to take actions to prevent or reduce further spillage if safe to do so.
On Scene Coordinator	**Checklist B**	The On Scene Coordinator is the person in charge at the scene of the pollution incident and has responsibilities reporting the incident to Morgan Offshore Wind Limited and for leading the pollution response at the scene, implementing spill response instructions from the Incident Manager.
Incident Manager	**Checklist C**	The Incident Manager will take overall management command of the spill response and ensures that it is being managed effectively by Morgan Offshore Wind Limited personnel and contractors.
HSE/Environment Manager	**Checklist D**	HSE/Environment Manager has responsibility for ensuring that the pollution incident is being managed in line with Morgan Offshore Wind Limited environmental policies and procedures, and with due regard to minimising environmental impacts.

[Example] Checklist A: Spill Observer (first person sighting the pollution incident).

Actions below should be completed by the first person who observes the spill	
INITIAL ACTIONS	
❒	Notify [Role] and provide details of: • Time • Possible source of spill • Current spill location • Oil/chemical type • Estimation of quantity of oil/chemical spilled • Any other relevant details.
❒	Contact all personnel in the vicinity of the spill and warn of the potential hazard.
ONGOING ACTIONS	
❒	**If safe to do so**, stay in vicinity of the spill and continue observation.
❒	**If safe to do so**, take any reasonable action to isolate the source of the spill.

5.1.5 Response strategy

Tiered response

5.1.5.1 For general oil spill response, it is common to divide levels of response into three tiers, according the resources required to combat it. The three tiers are defined as per Figure 5.1, where for each applicable response option*, Tier 1 are the resources necessary to handle a local spill and/or provide an initial response, Tier 2 are shared resources

necessary to supplement a Tier 1 response and Tier 3 are national/global resources necessary for spills that require substantial external response due to incident scale, complexity and/or consequence potential.

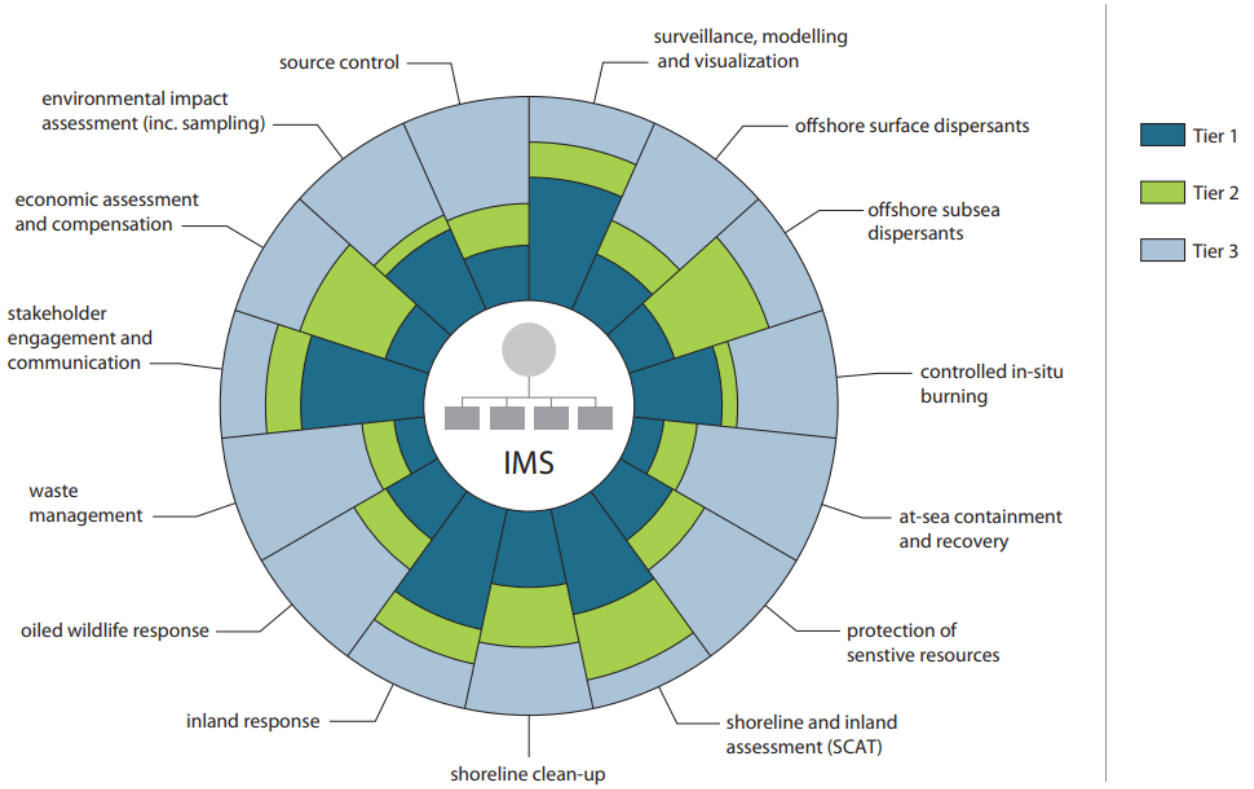

Figure 5.1: Definition of Tiers and potential response options* (Source: IPIECA, 2015).

*Note that this figure is conceptual and will be tailored specifically to applicable response options for offshore wind.

5.1.5.2 By identifying the response capabilities required to combat the spill, the appropriate resources according to tier level can be mobilised. Resources include trained personnel, equipment and specialist expertise where necessary.

Response technique selection

Overview

5.1.5.3 Table 5.1 below presents the likely response techniques for the Morgan Generation Assets, according to spill Tier and oil type. These will be appropriate to the product inventories and the potential risk.

Table 5.1: Potential response strategies identified for the Morgan Generation Assets.

Tier & Resources	Response techniques
Tier 1 – On site resources	Spill kits onboard vessels/wind turbines. Natural dispersion and monitoring using Crew Transfer Vessel (CTV). If safe to do so, agitate using vessel propeller (‘prop-wash’), by steaming through the slick using CTV.
Tier 2/3 – Additional resources	Initial techniques: • As per Tier 1 above. If needed:

Tier & Resources	Response techniques
	• An appointment of spill response contractor to determine most suitable response techniques according to spilled product(s) • Mobilisation of national resources.

Response techniques for Tier 1 resources

5.1.5.4 The key response techniques for spills requiring Tier 1 resources will be to allow natural dispersion, coupled with monitoring and evaluation using a small vessel. Allowing natural dispersion (or enhanced natural dispersion) is the best option for spills requiring Tier 1 resources of water-soluble chemicals, or of light oils such as diesel or hydraulic oil.

Response techniques for Tier 2/3 resources

5.1.5.5 In most cases, spills from Morgan Generation Assets activities are likely to need Tier 1 resources. However, in the unlikely event of larger incident requiring Tier 2/3 resources, or if the spilled oil/product persists, then alternative techniques may need to be selected.

5.1.5.6 For water-soluble chemicals or light oil products such as diesel or hydraulic oil, the best course of action is to allow natural dispersion, even for the larger spill volumes in a Tier 2/3 incident. Natural dispersion and monitoring is likely to be the recommended response technique for the Morgan Generation Assets.

5.1.5.7 A spill response contractor could be appointed on an ad-hoc basis to provide a Tier 2/3 spill response resources if needed in the event that a spill does not disperse naturally. A spill response contractor service may include the provision of advice and support, the provision of oil spill response equipment and/or dispersant application capability in the event that oil is not seen to be dispersing naturally (Note: use of dispersant would depend on the specific product spilled and if it is amenable to dispersant; formal permission is required by the MMO if dispersant is to be applied).

5.1.6 Environmental and socio-economics sensitivities

5.1.6.1 This section will provide an overview of the key environmental and socio-economic sensitivities in the vicinity of the Morgan Generation Assets for reference during a spill event, drawing on ITOPF (2024) resources on environmental effects.

5.1.6.2 Seabirds, marine mammals and fisheries are among the environmental aspects most at risk in the unlikely event of an oil spill. The overall impact of spilled oil on the marine environment may vary seasonally due to variations in species abundance and behaviour.

5.1.7 References

International Association of Oil and Gas Producers (IPIECA) (2015) Tiered preparedness and response Good practice guidelines for using the tiered preparedness and response framework, Available at: [redacted] Accessed: December 2024.

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MMO (2023) Marine Pollution Contingency Plan. Available at: https://assets.publishing.service.gov.uk/media/65143876b1bad4000d4fd8f8/MMO_Marine_Pollution_Contingency_Plan_2023.pdf, Accessed: December 2024.

5.1.8 Appendices

5.1.8.1 The MPCP will contain a number of Appendices to support the implementation of the plan. Typically the following Appendices will be included:

- Appendix A – Spill Assessment Checklist
- Appendix B – Spill Tier Assessment Table
- Appendix C – Oil Spill Sampling Guidelines
- Appendix D – Prop-washing Procedure
- Appendix E – MMO Spill Reporting Form
- Appendix F – Waste Management
- Appendix G – Government Responsibilities
- Appendix H – Fate and Effects of Oil Spills in the Marine Environment
- Appendix I – Pollution Incident Log Sheet
- Appendix J – Contacts Directory.

5.2 Annex B: Chemical risk assessment

5.2.1 Introduction

5.2.1.1 As set out in Schedules 3 and 4, Part 2, condition 20(1)(e) of the deemed Marine Licences within the draft DCO (REP3-013), the Offshore EMP will include details of a Chemical Risk Assessment, including information regarding how and when chemicals are to be used, labelled, stored and transported in accordance with recognised best practice guidance.

5.2.1.2 The Morgan Generation Assets Chemical Risk Assessment will be prepared post-consent once details of the final project design are available, and contractors have been appointed. The Chemical Risk Assessment will include details of the products to be used at the Morgan Generation Assets, including their Safety Data Sheets (SDS) which provide information on the safe supply, handling and use of chemicals. The Chemical Risk Assessment will set out information on the nature, storage, transport and handling of chemicals in line with good industry practice. This will minimise the risk of spill/pollution incidents occurring.

5.2.2 Estimated oil product and chemical inventory

5.2.2.1 The different types of oil products and chemicals that may be used during the construction and operation and maintenance phases of the Morgan Generation Assets will be set out in this section.

Table 5.2: Estimates oil product and chemical inventory for the Morgan Generation Assets.

Type of oil product/ chemical	ITOPF Group[1]	Function
	To be completed post-consent	To be completed post-consent
	To be completed post-consent	To be completed post-consent

5.2.3 Chemical use, management, storage and transportation

5.2.3.1 Appropriate procedures, method statements and risk assessments shall be in place for the use, transport and storage of chemicals in accordance with recognised industry best practice.

5.2.4 Control of substances hazardous to health

5.2.4.1 All chemicals used during the construction and operation and maintenance phases of the Morgan Generation Assets shall be subject to a Control of Substances Hazardous to Health (COSHH) Assessment.

[1] International Tanker Operators Pollution Federation (ITOPF) Classification based on the properties of the oil products and their likely persistence in the marine environment.

5.3 Annex C: Waste management and disposal measures

5.3.1.1 This section of the Offshore EMP will set out waste management and disposal measures relevant to the construction and operations and maintenance phases of the Morgan Generation Assets, including those detailed within the Morgan array area site characterisation report (APP-067).

5.3.1.2 Contractors will be required to follow the measures set out in this section of the Offshore EMP for managing waste and recording the movement of waste from the Morgan Generation Assets to appropriate waste management facilities.

5.3.1.3 This section will identify the likely waste arisings from the construction of the Morgan Generation Assets and set out appropriate measures for managing the waste in accordance with the waste hierarchy principle (see Figure 5.2). These measures will include measures to reduce waste; to use less harmful alternative materials; opportunities to use materials with recycled content; to provide appropriate waste storage; and the utilisation of licensed/registered waste carriers.

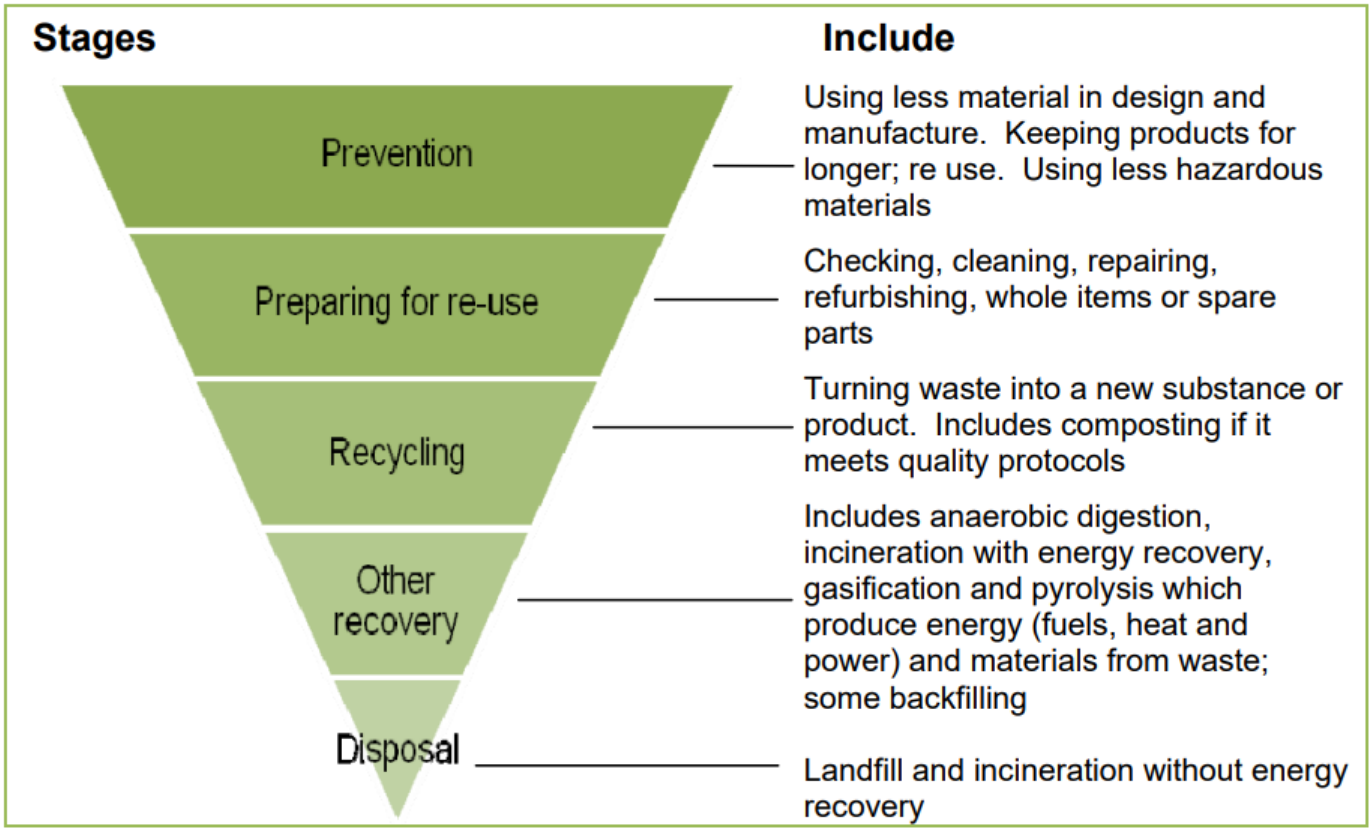

Figure 5.2: The waste hierarchy (Source: Defra, 2011).

5.3.1.4 This section will be prepared in accordance with the relevant legislation, policy, and guidance including:

- Environmental Protection Act 1990
- Environment Act 1995
- Hazardous Waste (England and Wales) regulations 2005 (as amended)
- Waste Management (England and Wales) Regulations 2006
- Waste (England and Wales) Regulations 2011 (as amended)
- The Environmental Permitting (England and Wales Regulations) 2016

- Defra Guidance on applying the Waste Hierarchy (Defra, 2011).

5.3.1.5 Key roles and responsibilities in relation to the implementation of waste management procedures will be set out here, including relevant mandatory training requirements (e.g. toolbox talks, method statements).

5.3.1.6 This section will also set out requirements for ongoing monitoring (e.g. regular site inspections) to ensure that construction waste is being managed appropriately according to the waste management procedures prescribed in this section.

5.4 Annex D: Fisheries Liaison and Coexistence Plan

5.4.1.1 See Outline fisheries liaison and co-existence plan (REP3-021, S_D4_13 Outline fisheries liaison and co-existence plan).

5.6 Annex E: Marine mammals and rafting birds disturbance management

5.6.1.1 See Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels (APP-070) and Outline vessel traffic management plan (REP2-017), which accord with Natural England's best practice protocol on displacement advice[2].

5.6.1.2 The final Measures to minimise disturbance to marine mammals and rafting birds from transiting vessels and Outline vessel traffic management plan will be prepared post-consent and attached to the final Offshore EMP.

[2] https://data.jncc.gov.uk/data/9aecb87c-80c5-4cfb-9102-39f0228dcc9a/joint-sncb-interim-displacement-advice-note-2022.pdf.

5.8 Annex F: Measures to minimise the potential spread of Invasive Non-Native Species (INNS)

5.8.1 Introduction

5.8.1.1 This section will provide an introduction to the Morgan Generation Assets Invasive Non-Native Species (INNS) management plan.

5.8.1.2 The EU Invasive Alien Species regulation came into force in January 2015, which requires action plans to control the introduction and spread of INNS. This regulation indirectly affects the Water Framework Directive (WFD)[3] , the Wildlife and Countryside Act 1981[4] and the Marine Strategy Framework[5]. The Morgan Generation Assets INNS management plan will ensure compliance with relevant legislation and international commitments for the Morgan Generation Assets.

5.8.1.3 The purpose of the INNS management plan is to ensure all procedures pertaining to Morgan Generation Assets activities follow best practice guidance, preventing and reducing the risk of possible spread or introduction of INNS into the marine environment. The method employed follows the GB Invasive Non-Native Species Framework Strategy which has a three-tier approach (GB NNSS, 2008):

- Prevention: Prevent all INNS from entering the waterbody in question
- Rapid response: Detection of INNS as early as possible, monitor and possible eradication of INNS present
- Control and containment: Should proliferation of INNS be too great for eradication, control and containment of populations will be required.

5.8.1.4 The Morgan Generation Assets INNS management plan will focus on ‘Prevention’, in line with the INNS Framework Strategy, with a view to avoiding the need for ‘rapid response’ and ‘control and containment’ methods. This document is to remain ‘live’, with periodic updates by Morgan Offshore Wind Limited.

5.8.2 Project description

5.8.2.1 This section will provide an overview of the Morgan Generation Assets activities, with cross reference to section 2 of the Offshore EMP.

5.8.3 INNS management plan methodology

5.8.3.1 This section will outline the process of creating an INNS management plan using the best available evidence and following best practice guidance (Cook *et al.,* 2015). In order to make an accurate risk assessment of the Morgan Generation Assets and derive a suitable INNS management plan, a stepwise approach will be taken, as follows:

- Step 1: Understand your site

[3] The WFD requires all European member states to aim for good chemical and ecological status (ecological status takes into account INNS present, which can reduce a waterbodies status).

[4] It is illegal under section 14 of the Wildlife and Countryside Act 1981 (as amended) to release or allow to escape into the wild any animal which is not ordinarily resident in Great Britain and is not a regular visitor to Great Britain in a wild state or is listed in Schedule 9 to the Act.

[5] The Marine Strategy Framework Directive requires Member States to put in place measures to achieve good environmental status in their marine waters by 2020.

- Step 2: Understand how INNS may be introduced or spread to your site
- Step 3: Understand the site activities
- Step 4: Biosecurity control measures
- Step 5: Biosecurity surveillance, monitoring and reporting procedures
- Step 6: Contingency Plan.

5.8.3.2 A clear recording system and review process will be established to refine and update the INNS management plan as required.

5.8.4 Morgan Generation Assets INNS management plan

5.8.4.1 This section will provide the INNS management plan for the Morgan Generation Assets, in line with the methodology set out above.

5.8.5 Monitoring

5.8.5.1 Morgan Offshore Wind Limited has committed to carrying out post-construction monitoring to establish the presence/absence of INNS around seabed infrastructure. The monitoring approach is to use the scheduled pre and post-construction engineering surveys to include ecological monitoring such as reviewing any suitable Drop Down Video (DDV) data available for the identification of INNS. The purpose of this monitoring is to validate the predictions made in the Environmental Statement with regard to INNS. This commitment is detailed within the Offshore in-principle monitoring plan (REP2-013).

5.8.5.2 Should the monitoring related to INNS detect the presence of INNS, Morgan Offshore Wind Limited will commit to considering the feasibility of collecting samples of the communities colonising the seabed infrastructure for further analysis of INNS. Morgan Offshore Wind Limited would note, however, that the feasibility of the collection of such samples would be dependent on the technical specifications of the equipment available at the time to undertake the surveys as well as health and safety considerations. Morgan Offshore Wind Limited will however commit to exploring this as an adaptive management measure which would be discussed with the MMO as part of the development of the monitoring plan post-consent, secured within the DCO dMLs under Schedules 3 and 4, Part 2, condition 20(1)(c) (S_D4_8 Draft Development Consent Order).

5.8.6 References

Cook, E.J., Macleod, A. Payne, R.D., and Brown, S. (2014) edited by Natural England and Natural Resources Wales (2015) Marine Biosecurity Planning – Guidance for producing site and operation-based plans for preventing the introduction and spread of non-native species in England and Wales.

GB NNSS (2008) The invasive non-native species framework strategy for Great Britain. Defra, London.

5.9 Annex G: Dropped Object Procedure Form

5.9.1.1 This section will include the Dropped Object Procedure Form.

6 REFERENCES

Department for Environment, Food and Rural Affairs (Defra) (2011) Guidance on applying the waste hierarchy, Available at: https://www.gov.uk/government/publications/guidance-on-applying-the-waste-hierarchy, Accessed: December 2024.

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