



# Morven North Offshore Wind Array Project

Environmental Impact Assessment Report

**Volume 4, Annex 1, Appendix 1.1: Marine  
Pollution Contingency Plan (MPCP) (Version 1)**

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## Glossary

Term	Meaning
The Applicant	The entity making applications; Morven Offshore Wind Limited (MvOWL).
Bridge-linked High Voltage Direct Current (HVDC) Offshore Substation Platform (OSP)	High voltage direct current (HVDC) Offshore Substation Platform (OSP) connected by cabling across a bridge structure.
Designed-in measures	<p>Either primary or tertiary mitigation measures, which are considered inherent to the project's design. Includes:</p> <ul style="list-style-type: none"> <li>• Measures included as part of the project design;</li> <li>• Industry standard measures committed to by the Applicant (including post-consent management plans);</li> <li>• Measures required to meet legislative requirements.</li> </ul>
High Voltage Alternating Current (HVAC)	High voltage alternating current (HVAC) is the transmission of electricity by alternating current (AC), whereby the flow of electric charge periodically reverses direction.
High Voltage Direct Current (HVDC)	High voltage direct current (HVDC) is the transmission of electricity by direct current (DC), whereby the flow of electric charge is in one direction.
Inter-array cables	Cables connecting wind turbines to each other and to Offshore Substation Platforms.
Interconnector cables	Cables connecting Offshore Substation Platforms to each other.
Marine Directorate Licensing Operations Team (MD-LOT)	The part of the Scottish Government's Marine Directorate responsible for assessing and administering applications for marine licences and Section 36 consent (offshore) in Scotland.
The Morven Option Lease Agreement Site (hereafter, "Morven Site")	The 859km <sup>2</sup> area awarded to JERA Nex bp and EnBW's 'Morven' project, identified as a result of the ScotWind Leasing Round and located in Plan Option area E1. Morven North and Morven South are two distinct projects, located with the Morven Option Lease Agreement Site.
The Morven North Offshore Wind Array Project (hereafter "Morven North")	The Morven North Offshore Wind Array Project which includes the wind turbines and foundations, offshore substation platforms (OSPs) and associated foundations, inter-array and interconnector cables and associated infrastructure located within the Morven North Boundary. Consent for the export cables for Morven North will be sought separately.

Term	Meaning
The Morven South Offshore Wind Array Project (hereafter "Morven South").	The Morven South Offshore Wind Array Project which includes the wind turbines and foundations, offshore substation platforms and associated foundations, inter-array and interconnector cables and associated infrastructure in the Morven South Boundary. Consent for the export cables for Morven South will be sought separately.
Morven North Boundary	Boundary within which the wind turbines and foundations, OSPs and foundations, inter-array cables, interconnector cables and offshore substation platforms for Morven North will be located.
Morven South Boundary	Boundary within which the wind turbines and foundations, OSPs and foundations, inter-array cables, interconnector cables and offshore substation platforms for Morven South will be located.
Offshore Substation Platforms (OSPs)	OSPs comprise the support structure, topside and electrical components used for collecting the electricity generated by the wind turbine generators. These OSPs can be divided into two types: <ul style="list-style-type: none"> <li>• HVAC (High Voltage Alternating Current) collector substations;</li> <li>• HVDC (High Voltage Direct Current) converter substations.</li> </ul>
Wind turbine	A machine that converts kinetic energy from the wind into electricity comprising the following main parts: nacelle, hub, blades, tower and drivetrain.

## Acronyms

Acronym	Meaning
CGOC	Coastguard Operations Centre
COSHH	Control of Substances Hazardous to Health
EnvCoW	Environmental Clerk of Works
EMP	Environmental Management Plan
ERCoP	Emergency Co-operation Plan
HVAC	High Voltage Alternating Current
HVDC	High Voltage Direct Current
IFO	Intermediate Fuel Oil
INNSMP	Invasive Non-Native Species Management Plan
MARPOL	International Convention for the Prevention of Pollution from Ships

Acronym	Meaning
MCA	Marine Coastguard Agency
MD-LOT	Marine Directorate – Licensing Operations Team
MGO	Marine Gas Oil
MHWS	Mean High Water Springs
MPCP	Marine Pollution Contingency Plan
NCP	National Contingency Plan
O&M	Operation and Maintenance
OSP	Offshore Substation Platform
POLREP	Marine Pollution Report
RAMS	Risk Assessment Method Statements
SDS	Safety Data Sheet
SEPA	Scottish Environment Protection Agency
SITREP	Situation Report
SOSREP	Secretary of State’s Representative for Maritime Salvage and Intervention
VOCs	Volatile Organic Compounds
VHF	Very High Frequency

## Units

Unit	Meaning
km	Kilometre
km <sup>2</sup>	Square kilometre

# 1 Introduction

## 1.1 Purpose

- 1.1.1.1 This Marine Pollution Contingency Plan (MPCP) (Version 1) outlines the proposed pollution response arrangements for the offshore Infrastructure associated with the Morven North Offshore Wind Array Project (hereafter referred to as “Morven North”) and Morven South Offshore Wind Array Project (hereafter referred to as “Morven South”) during the construction and Operation and Maintenance (O&M) phases of each project.
- 1.1.1.2 The primary aim of this MPCP (Version 1) is to outline the procedures designed to protect the marine environment and respond effectively to any accidental pollution incidents, should they occur, during the construction and O&M phases of Morven North and Morven South. Once the final decommissioning plan and methodologies are established, a separate MPCP will be developed to address environmental protection measures during the decommissioning phase.
- 1.1.1.3 This MPCP (Version 1) reflects the industry-recognised best practice for pollution preparedness, ensuring that a MPCP is in place where there is a risk of pollution, even when that risk is considered to be minimal.
- 1.1.1.4 If a marine pollution incident occurs as part of a wider emergency (e.g. a fire or an explosion), the Emergency Co-operation Plan (ERCoP) should also be consulted. The ERCoP will be prepared once consent is granted.

## 1.2 Project background

- 1.2.1.1 Morven North is a proposed fixed-foundation offshore wind farm located approximately 61km from the Aberdeenshire Coast. The Morven North Boundary is illustrated within Figure 1.1 and covers an area of 511.1km<sup>2</sup>.
- 1.2.1.2 Morven South is a proposed fixed-foundation offshore wind farm located approximately 86km from the Aberdeenshire Coast. The Morven South Boundary is illustrated within Figure 1.1 and covers an area of 347.7km<sup>2</sup>.
- 1.2.1.3 Morven North includes the following components:
- up to 96 wind turbines;
  - up to five OSPs and associated support structures and foundations, including:
    - up to four HVAC collector substation platforms;
    - up to one HVDC convertor substation (this could be a single platform or two platforms linked by a bridge);
  - a network of inter-array cabling linking the individual wind turbines to each other and to the OSPs, plus interconnector cables connecting OSPs to each other (approximately 424km of inter-array cabling and 484km of interconnector cabling).
- 1.2.1.4 Morven South includes the following components:
- up to 95 wind turbines;
  - up to five OSPs and associated support structures and foundations, including:
    - up to four HVAC collector substation platforms;
    - up to one HVDC convertor substation (this could be a single platform or two platforms linked by a bridge);
  - a network of inter-array cabling linking the individual wind turbines to each other and to the OSPs, plus interconnector cables connecting OSPs to each other (approximately 420km of inter-array cabling and 264km of interconnector cabling).

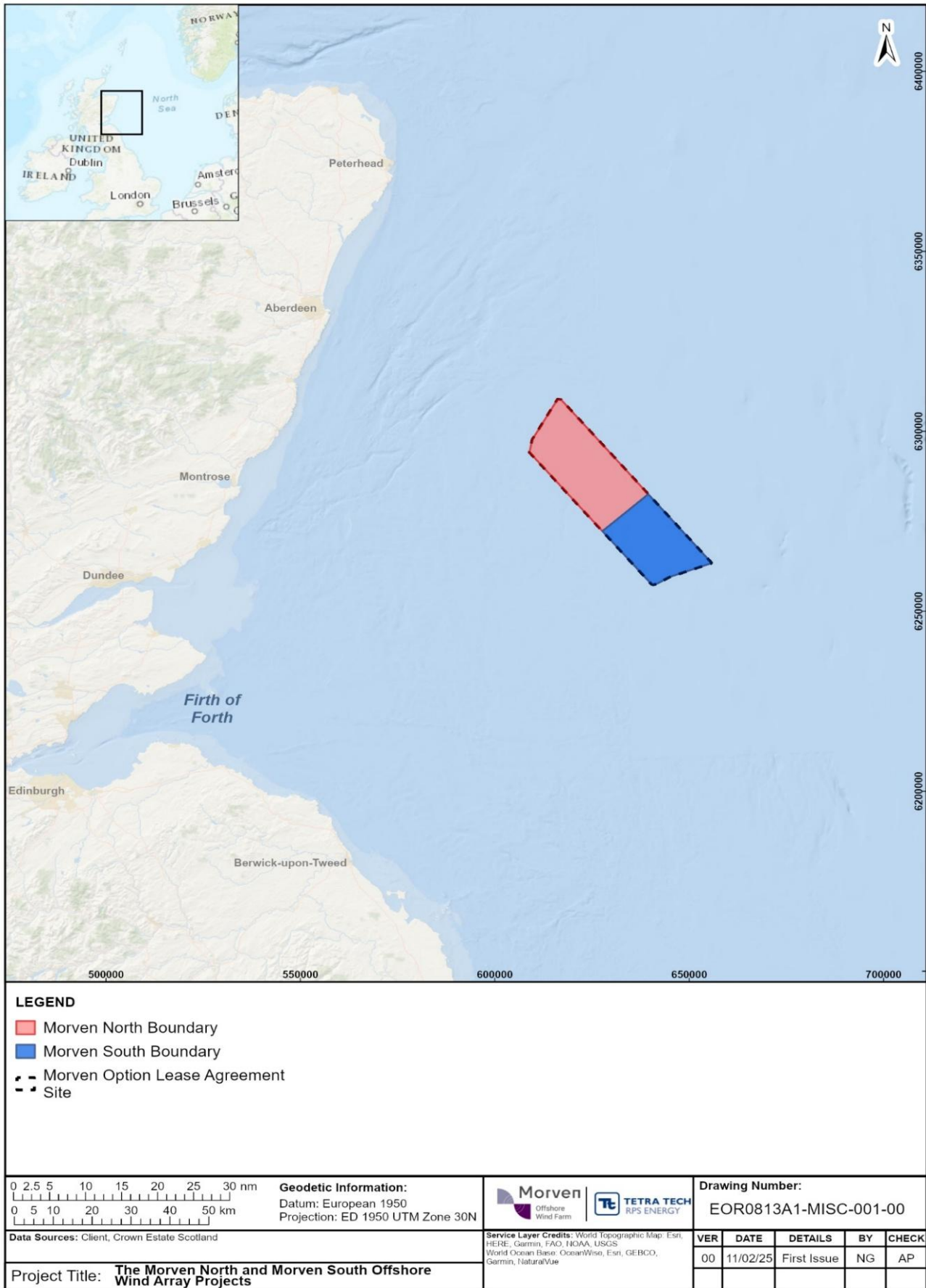


Figure 1.1: Location of the Morven North and Morven South Boundary within the Morven Option Lease Agreement Site

## 1.3 Scope

- 1.3.1.1 This MPCP serves as an appendix to the Morven North and Morven South Environmental Management Plan (EMP) (Version 1). It outlines the measures that are proposed to be implemented to protect personnel and the marine environment during the construction and O&M phases of marine works associated with Morven North and Morven South, up to Mean High Water Springs (MHWS).
- 1.3.1.2 The MPCP outlines key information and guidance to support responses to accidental releases of pollutants into the marine environment arising from activities related to Morven North and Morven South, including:
- an assessment of pollution sources and the probability/likelihood of accidental release (Section 4.2);
  - the proposed procedures and actions for responding to oil spills (Section 5).
- 1.3.1.3 Next steps of this MPCP, post-consent, include:
- confirmation of a final plan once all necessary details are known, including final design of Morven North and Morven South, developed in consultation with relevant stakeholders;
  - compliance with this MPCP by contractors and/or subcontractors;
  - compliance with any other relevant plans not covered by this MPCP by contractors and/or subcontractors, including, but not limited to:
    - vessel-based emergency response plans;
    - vessel-based spill response;
    - port-side spill response.
- 1.3.1.4 This MPCP (Version 1) provides provisional roles (naming and associated responsibilities), however, the Applicant reserves the right for listed roles and responsibilities to be carried out by alternative personnel within the applicant team. The final roles, naming of said roles, and responsibilities will be confirmed during the pre-construction phase, with the associated MPCP submitted for approval by MD-LOT. The delivery of the key responsibilities listed in this MPCP (Version 1), are committed to at this pre-application stage.

## 1.4 Consent conditions

- 1.4.1.1 Table 1.1 will summarise the conditions included in the marine licence (under the Marine and Coastal Access Act 2009) (MCAA) and Section 36 Consent in relation to marine pollution.

**Table 1.1: Consent conditions to be discharged by this Marine Pollution Contingency Plan**

Consent document	Consent condition reference	Consent condition	Reference to relevant section of this MPCP

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## **1.5 Document revision**

- 1.5.1.1 The MPCP will be refined by the Applicant prior to construction commencing. The plan will then be reviewed on a regular basis thereafter, or after significant legislative or procedural changes that would require updates to be made to this MPCP.
- 1.5.1.2 The MPCP will also undergo further refinement to prepare for the O&M phases of Morven North and Morven South.

## 2 Summary of designed-in measures mitigation and monitoring included in the Morven North and Morven South Environmental Impact Assessment Reports

2.1.1.1 A summary of the designed-in measures identified within the Morven North and Morven South Environmental Impact Assessment (EIA) Reports relevant to the MPCP are outlined below in Table 2.1.

**Table 2.1: Designed-in measures relevant to the Marine Pollution Contingency Plan**

Designed-in measures	Justification
Development of, and adherence to an EMP	The EMP will ensure appropriate environmental controls are in place for Morven North and Morven South, and the agreed procedures to mitigate potential risk to the receiving environment. Measures will cover a wide range of management measures including environmental awareness training, auditing, reporting procedures and waste management. It is expected that the EMP will include a MPCP and an INNSMP and Biosecurity Plan. The EMP is also expected to limit potential environmental damage from small quantities of drill fluids which may be released and as regulated by the UK Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulations.
Development of, and adherence to a MPCP	<p>To reduce the potential for release of pollutants from construction, O&amp;M and decommissioning, two MPCPs will be developed, one for the construction and O&amp;M phases, and another for the decommissioning phase.</p> <p>The MPCP will include planning for accidental spills, addressing all potential contaminant releases and include key emergency details, and will be in line with appropriate regulations and guidelines.</p>

## **3 Roles and responsibilities**

### **3.1 The Applicant**

3.1.1.1 The Applicant is expected to include contractual provisions requiring contractors and subcontractors to assume responsibility for any pollution events arising from Morven North and Morven South.

### **3.2 The Applicant Environmental Manager**

3.2.1.1 For each phase of Morven North and Morven South, the Applicant Environmental Manager, or similar, is accountable for the comprehensive preparation and execution of the MPCP. Key responsibilities include the following, with a final list of responsibilities confirmed post-consent:

- preparing and maintaining the MPCP according to an agreed schedule. Agreed schedule will be approved by the Applicant Environmental Manager (or similar);
- ensuring that contractors develop MPCPs for the activities that they are responsible for, incorporating effective pollution prevention and spill response procedures, and verifying that these plans are reviewed on schedule and consistently implemented throughout operations;
- contributing to toolbox talks for contractors and subcontractors to support effective implementation of the MPCP in accordance with relevant consent conditions.

3.2.1.2 The Applicant Environmental Manager (or similar) will update the MPCP as needed throughout the construction phase of Morven North and Morven South to incorporate any new or emerging information. Additionally, the MPCP will be reviewed and revised following the completion of construction to ensure it is appropriately tailored for the O&M phase of both Morven North and Morven South.

3.2.1.3 The Applicant will appoint an Independent Environmental Clerk of Work (EnvCoW), Marine Coordinator (or similar) and a dedicated Spill Response contractor for Morven North and Morven South.

3.2.1.4 After the construction phase of Morven North and Morven South has been completed, the MPCP will be reviewed and updated on a regular basis, or whenever significant legislative or procedural changes occur that necessitate revisions.

3.2.1.5 If an oil or chemical spill occurs in the marine environment, an internal review meeting will be held after remedial actions are completed. The Applicant Environmental Manager (or similar) will lead this meeting to formally close out the incident and ensure that all lessons learned are documented and addressed.

### **3.3 The Environmental Clerk of Works (EnvCoW)**

3.3.1.1 The Applicant will appoint an independent EnvCoW, who will be acting as an impartial observer separate from the Morven North and Morven South delivery team. Their main responsibilities will include (not limited to) the following, with a final list of responsibilities confirmed with MD-LOT post-consent:

- overseeing quality assurance and approval of the Applicant's MPCP, ensuring compliance with associated consent conditions, the EMP, and other relevant consent plans;
- review and approve all updates and amendments to the MPCP made by the Environmental Manager, throughout all phases of Morven North and Morven South;
- conducting inductions and contributing to toolbox talks for contractors and subcontractors to support effective implementation of the MPCP in accordance with relevant consent conditions;
- support contractor spill response activities through direct liaison with relevant contractors;
- ensuring the MPCP is delivered and complied with, including assigning named personnel, securing appropriate resources, and establishing required processes;

- ensuring full compliance with consent conditions, the EMP, other relevant consent plans, and applicable legislation and policy during MPCP delivery;
- support the responsible person in notifying relevant statutory bodies of any spill, including but not limited to, the Marine and Coastguard Agency (MCA), the Marine Directorate – Licensing Operations Team (MD-LOT), Scottish Environment Protection Agency (SEPA), and relevant local authorities.

### **3.4 Marine Coordinator**

- 3.4.1.1 The Applicant will appoint a Marine Coordinator(s) (or similar/will be delivered by another resource) prior to the commencement of construction for Morven North and/or Morven South. In addition to overseeing daily vessel operations across Morven North and/or Morven South, the Marine Coordinator(s) (or similar) will serve as the primary point of contact in the event of an emergency or pollution incident.
- 3.4.1.2 The Marine Coordinator (or similar) will support the ongoing response to pollution incidents arising from a vessel or vessel related activity, ensuring continuous close communication between the Applicant and any other relevant contractors and subcontractors, and with the Coastguard Operations Centre and the MCA where necessary.
- 3.4.1.3 The Marine Coordinator (or similar) will be responsible for managing the pollution response and coordinating any necessary clean-up operations in the event of a pollution incident resulting from installation activities.

### **3.5 Contractor and subcontractor**

- 3.5.1.1 The majority of construction and O&M activities at Morven North and Morven South will be performed by contractors and subcontractors. Accordingly, the Applicant will require, through contractual agreements, that these parties are familiar, and comply with, the MPCP.
- 3.5.1.2 Before commencing any activities at Morven North and/or Morven South, each contractor or subcontractor will be expected to develop their own MPCP. These individual plans will be required to align with the overarching Morven North/Morven South MPCP and include spill response procedures, such as reporting and response protocols that integrate with this plan. Additionally, contractors and subcontractors will be expected to maintain a spill risk register for all equipment intended for use on Morven North and Morven South.
- 3.5.1.3 Contractor and subcontractor MPCPs must be submitted to the Applicant for review and approval prior to implementation at Morven North and/or Morven South. Once approved, each plan will be subject to regular review, with every revision requiring re-approval by the Applicant before implementation.
- 3.5.1.4 Contractors and subcontractors are expected to ensure that relevant personnel are trained in pollution prevention and response, and that vessels are equipped with appropriate pollution response equipment.
- 3.5.1.5 All vessels operating in Morven North and Morven South must comply with the Applicant's risk-based Vessel Inspection and Management regime. Additionally, vessels under the control of contractors or subcontractors must have a Shipboard Oil Pollution Emergency Plan (SOPEP) or an equivalent vessel specific spill response plan in place, covering potential spills from vessel operations or related activities.
- 3.5.1.6 The Applicant are expecting to include contractual provisions requiring contractors and subcontractors to promptly notify the Marine Coordinator (or other designated project contact) of

any pollution incidents at Morven North and Morven South, and to provide details of the response actions taken or proposed.

### **3.6 Spill response contractor**

- 3.6.1.1 Prior to the start of construction, an oil spill response contractor must be appointed and in place at Morven North and Morven South.
- 3.6.1.2 During the construction phase, the independent EnvCoW shall provide environmental advice and support, and the oil spill response contractor shall provide the response capability necessary to address the maximum adverse scenario associated with the contractor or subcontractor scope of work.
- 3.6.1.3 Throughout the O&M phase, the Applicants Environmental Manager (or similar) shall provide environmental advice/support, and the oil spill response contractor shall provide response capabilities, necessary to address the maximum adverse scenarios associated with the contractors scope of work. They will coordinate with the Applicant's Environmental Manager (or similar) as needed, for O&M activities carried out at Morven North and Morven South.
- 3.6.1.4 In the unlikely event of a Tier 2/3 spill taking place (see Section 4.2 for Tier classifications), the Applicant will decide whether to engage a Tier 2/3 contractor. This decision will be made in consultation with the MCA and MD-LOT.

### **3.7 Maritime and Coastguard Agency**

- 3.7.1.1 The MCA serves as the UK's Competent Authority for national-level counter pollution response and is responsible for maintaining the National Contingency Plan (NCP). This plan sets out procedures for managing pollution incidents or threats arising from shipping and offshore installations. Although the national framework does not specify strict criteria for activating the NCP, it is considered highly unlikely that it would be triggered for incidents related to Morven North and Morven South, given the minimum pollution risk associated with offshore wind farm activities.

## 4 Potential spill sources and control measures

### 4.1 Potential spill sources and control measures

- 4.1.1.1 Construction and O&M activities will be carried out with the aim of minimising the risk of spills and accidental pollution.
- 4.1.1.2 The greatest risk of spills arises during offshore transfers of hydrocarbons and chemicals, such as refuelling operations or equipment leaks within Morven North and Morven South. However, with implementation of robust control measures including established operating procedures, toolbox talks, and the Morven North and Morven South team's experience in the marine environment, most spills associated with Morven North and Morven South are anticipated to be minor (Tier 1 – see Section 4.2 for further details on tiering classification).
- 4.1.1.3 Contractors and subcontractors will be required to include the following in their MPCP:
- Programme review meetings involving relevant contractors.
  - Pre-commencement meetings to review the final work programme(s).
  - Preparation of Risk Assessment Method Statements (RAMS) for all operations including hazard and risk identification. This process will assess the likelihood and severity of potential risks and identify appropriate control measures.
  - An inventory of pollutants will be maintained. These will be the pollutants used during the construction and/or O&M phase of Morven North and Morven South. This inventory will include the type, source and volumes of each pollutant identified (e.g. lubricants).
  - Any measures that will be implemented in a preventative capacity relevant to activities taking place at Morven North and Morven South.
- 4.1.1.4 Further to this, a vessel register will be created and managed by the Marine Coordinator (or similar). This register will keep track of all the vessels involved in the construction and O&M phases of Morven North and Morven South, whilst also listing the types and volumes of hydrocarbons that will be stored on board these vessels.
- 4.1.1.5 Section 4.2 provides details on pollution sources, risk assessment, and proposed control measures.

### 4.2 Pollution sources and risk assessment

#### 4.2.1 Tier classification

- 4.2.1.1 Potential spill scenarios will be dictated by the chemical inventories (including hydrocarbons) associated with activities associated with Morven North and Morven South.
- 4.2.1.2 Oil spill response levels are typically categorised into three tiers, reflecting the severity of the incident, the scale and complexity of the response required, and the potential impacts on environmental and human receptors. This tiered framework is consistent with the approach set out in the UK NCP for Responding to Marine Pollution Incidents (June 2024), which provides the overarching structure for the management and escalation of marine pollution responses within UK waters. The tiered approach ensures that appropriate and proportionate resources can be mobilised for any pollution event. The tiers are defined as follows and illustrated in Figure 4.1:
- Tier 1 immediate on site response for the most likely and low-risk spills, generally managed by the contractor or subcontractor on site;
  - Tier 2 response to less frequent, larger spills requiring external regional resources for monitoring and clean-up;
  - Tier 3 response to rare, major spills that may necessitate national or international resources to protect vulnerable areas and support clean-up operations.



**Figure 4.1: Tier definition (based on the United Kingdom National Contingency Plan (HM Government, 2024))**

4.2.1.3 Tier 3 scenarios typically involve exceptionally large volumes of spilled oil/hydrocarbons, and are rare but serious events, such as major ship spills or oil well blowouts. However, a Tier 3 response may also be triggered by smaller spills that would ordinarily fall under Tier 2, particularly if they occur in highly sensitive areas (e.g. near designated sites with features vulnerable to pollution impacts), or if specialised response strategies are required that are not readily available at the regional level.

## 4.2.2 Morven North and South potential spill scenarios and control measures

4.2.2.1 Table 4.1 outlines the potential spill scenarios and associated control measures identified for Morven North and Morven South. This table will be refined prior to the start of construction and adapted for the relevant contractor MPCP as additional details become available. In addition, the risk assessment will be reviewed and updated regularly, or following significant legislative or procedural changes as necessary, after construction is completed, to ensure its continued relevance before the O&M phase begins for Morven North and Morven South.

4.2.2.2 The main source of hydrocarbons associated with Morven North and Morven South are likely to include the following:

- Wind Turbines: synthetic oil, hydraulic oil, gear oil and diesel fuel;
- OSPs: diesel fuel, transformer coolant, HVAC coolant;
- Vessels: diesel fuel, lubricating oil, hydraulic fluids, ballast water.

4.2.2.3 The volume of potential spills will be constrained by the bunkering capacity of the vessels. The realistic maximum adverse scenario would involve the complete loss of fuel inventory from two large vessels, either resulting from a collision between two vessels or an allision between a vessel and the wind farm.

**Table 4.1: Potential spill scenarios and control measures<sup>1</sup>**

Potential pollutant	Spill scenario	Control measures	Likelihood with control measures	Likely Tier
Hydrocarbons  Marine Gas Oil (MGO) and/or Intermediate Fuel Oil (IFO)	<b>Vessel Refuelling</b>  Fuel lost during vessel-to-vessel refuelling,	Refuelling operations offshore will be performed by contractors as necessary, particularly for vessels that are unable to depart their operational position to refuel, such as jack-up units.  Preparation and review of task-specific RAMS and fuel transfer planning tools and checklists.	Low	Tier 2
	<b>Equipment Refuelling</b>  Fuel lost during refuelling of equipment (i.e. on vessels or on wind turbine/OSPs).	All refuelling operations will be planned in advance. As far as practicable, any offshore refuelling should only commence during daylight and in good weather conditions.  All refuelling operations shall be carried out under the supervision of a designated responsible officer on board (e.g. Chief Engineer) and in strict accordance with the vessel’s approved procedures and checklists.  A bunker plan shall be developed and posted on the Bridge and in the Machinery Control Room.  A meeting will be held with the ship staff involved in fuel transfer before the operation commences, and the following will be discussed, as a minimum: <ul style="list-style-type: none"> <li>• bunker plan, including any anticipating changes;</li> <li>• risk assessment;</li> <li>• individual roles and responsibilities in the process;</li> <li>• emergency situations;</li> <li>• bunkering checklists.</li> </ul> Only hoses fitted with non-return valves shall be used for the offshore transfer of fuel or other fluids.	Low	Tier 1

<sup>1</sup> The potential spill scenarios and control measures presented in this table are illustrative only. Prior to construction, detailed risk assessments, including vessel impact assessments where applicable, shall be completed to confirm the relevant spill risks and required control measures for the planned activities

Potential pollutant	Spill scenario	Control measures	Likelihood with control measures	Likely Tier
		<p>All personnel shall comply with applicable legislation, as well as any permits and environmental guidance relevant to their work and associated activities. To ensure compliance, appropriate training will be provided, including spill prevention awareness and the correct use of spill kits, and all operations will be subject to adequate supervision.</p> <p>During fuel transfer operations, a visual lookout will be made to verify hose integrity at all times during the transfer and to spot any leaks immediately.</p> <p>All storage tanks and/or areas shall be banded to at least 110% of the total oil storage inventory volume.</p> <p>Spill kits shall be readily available for clearing any minor spills.</p> <p>Inspection and maintenance of equipment will be carried out during operations regularly.</p> <p>Various measures, such as drip trays beneath oil pumps and heaters, and dedicated oil gutter systems, are in place to prevent fuel oil from entering the bilges. These systems shall be inspected regularly and drained or cleaned as necessary.</p> <p>Oil pressure pipes and fuel oil pipes and fittings will be inspected regularly to ensure that leaks are detected at an early stage and rectified.</p>		
	<p><b>Vessel to Vessel Collision</b> Fuel lost from vessel to vessel collision.</p>	<p>To mitigate the risk of vessel to vessel collisions and vessel to structure allisions, all vessels operating within Morven North and Morven South shall comply with the specific navigational requirements established for Morven North and Morven South. These requirements will be agreed prior to the construction phase and communicated to all contractors working on site.</p>	Very low	Tier 2
	<p><b>Vessel to Structure Allision</b> Fuel lost from vessel to structure allision (e.g. wind turbines).</p>	<p>Additionally, marine coordination protocols implemented before the commencement of offshore activities shall be adhered to by both vessels and marine coordinators to reduce the likelihood of such incidents.</p>	Very low	Tier 2

Potential pollutant	Spill scenario	Control measures	Likelihood with control measures	Likely Tier
	<b>Vessel Stranding/Grounding</b> Fuel lost due to vessel stranding/grounding.	To avoid vessel stranding or grounding, all vessels operating within Morven North and Morven South shall comply with the specific navigational requirements agreed prior to the construction phase and communicated to all contractors working on site.	Very low	Tier 2
	<b>Failure of Plant or Equipment</b> Release of fuel due to plant or equipment failure.	All equipment shall be operated and maintained in sound working condition and in full compliance with applicable legal requirements. Only trained and competent personnel shall be authorised to operate plant and equipment.  All storage tanks and designated areas will be bunded to a minimum of 110% of the total oil storage capacity. Measures to prevent fuel oil from entering bilges (e.g. drip trays beneath pumps and heaters, and dedicated oil gutter systems) will be regularly inspected, drained, or cleaned as necessary.  Additionally, oil pressure and fuel oil pipes and fittings will be routinely inspected to ensure early detection and prompt repair of any leaks.	Low	Tier 1
	<b>Spillage During Use of Equipment</b> Small spills during equipment operation.	Task-specific RAMS will be prepared and reviewed in advance. Personnel will receive appropriate training, including spill prevention awareness and the correct use of spill kits. Spill kits will be readily accessible to manage any minor spills.  Measures to prevent fuel oil from entering bilges, such as drip trays and dedicated drainage systems, shall be inspected regularly and drained or cleaned as required. In addition, oil pressure and fuel oil pipes and fittings will undergo routine inspections to ensure early detection and prompt rectification of any leaks.	Low	Tier 1
Lubricating Oil	<b>Vessel to Vessel Collision:</b> Lubrication oil that is lost, caused by collision between two vessels.	To prevent vessel to vessel collisions and vessel to structure collisions, all vessels operating within Morven North and Morven South shall comply with the specific navigational requirements for Morven North and Morven South, which will be agreed prior to	Very low	Tier 2

Potential pollutant	Spill scenario	Control measures	Likelihood with control measures	Likely Tier
	<p><b>Vessel to Structure Allision:</b> Lubrication oil that is lost, caused by allision between vessel and structure.</p>	<p>the construction phase and communicated to all contractors on site. Additionally, marine coordination protocols established before offshore activities commence shall be followed by both vessels and marine coordinators to reduce collision risk.</p>		
	<p><b>Vessel Stranding/Grounding</b> Lubrication oil that is lost, caused by stranding/grounding of vessel.</p>			
	<p><b>Leakage within Wind Turbines</b> Lubricating gear oil or grease within the nacelle that is lost from leakage.</p>	<p>All equipment shall be operated and maintained in sound working condition and in full compliance with applicable legal requirements. Only trained and competent personnel shall be authorised to operate plant and equipment.</p> <p>Wind turbine nacelles are typically designed with integrated bunds capable of containing the full volume of gearbox oil in the event of a catastrophic failure. Sensors within the turbines will enable early detection of fluid loss.</p> <p>Additionally, nacelles include bunded areas to capture lubricating oil in the unlikely event of a leak. Gear oil seals will be routinely inspected as part of scheduled maintenance programmes.</p>	Low	Tier 1
	<p><b>Leakage within OSPs/Offshore convertor station platforms</b> Leakage of transformers.</p>	<p>All equipment shall be operated and maintained in sound working condition and in full compliance with applicable legal requirements. Only trained and competent personnel shall be authorised to operate plant and equipment.</p> <p>Transformer oil seals shall be routinely checked during planned maintenance programmes.</p> <p>Environmental Designed-In measures, such as transformer bunding to contain any oil leaks, will be fully operational prior to the OSP/Offshore convertor station platform transportation stage.</p> <p>The OSPs and offshore converter station platforms are equipped with a drainage system that collects wastewater and connects</p>	Low	Tier 1

Potential pollutant	Spill scenario	Control measures	Likelihood with control measures	Likely Tier
		bunded areas. This system incorporates an oil separation unit to remove contaminants from the collected water. The treated water is re-circulated through the separator, with clean water discharged in compliance with prescribed limits. Any separated contaminants will be securely contained and stored for transport to shore for controlled processing and/or disposal.		
	<b>Spillage During Use of Equipment</b> Small spills during equipment operation.	Task-specific RAMS will be prepared and reviewed in advance. Personnel will be trained in spill prevention awareness and the proper use of spill kits, which will be readily available to manage any minor spills.  Fittings will be routinely inspected to detect any leaks, which will be addressed promptly to prevent escalation.	Low	Tier 1
	<b>Failure of Plant or Equipment</b> Release of lubricating oil due to failure of plant or equipment.	All equipment shall be operated and maintained in sound working condition and in full compliance with applicable legal requirements. Only trained and competent personnel shall be authorised to operate plant and equipment.	Low	Tier 1
Chemicals	<b>Incident</b> Chemical load from vessel collision/allision, or stranding/grounding vessel lost.	To prevent vessel to vessel collisions and vessel to structure allisions, all vessels operating within Morven North and Morven South shall comply with the specific navigational requirements for Morven North and Morven South, which will be agreed prior to the construction phase and communicated to all contractors on site. Additionally, marine coordination protocols established before offshore activities commence shall be followed by both vessels and marine coordinators to reduce collision risk.	Very low	Tier 1
	<b>Leakage within Wind Turbines</b> Leakage of coolant or transformer fluid within nacelle.	All equipment shall be operated and maintained in sound working condition and in full compliance with applicable legal requirements. Only trained and competent personnel shall be authorised to operate plant and equipment.  Turbine sensors will enable early detection of loss of fluid and leaks.	Low	Tier 1

Potential pollutant	Spill scenario	Control measures	Likelihood with control measures	Likely Tier
		<p>Equipment including hoses, pipes and seals shall be routinely checked during planned maintenance programmes.</p> <p>Chemicals will, where relevant, be selected, stored and managed in accordance with the relevant regulations and legislation.</p>		
	<p><b>Spillage During Use</b> Spillage of paints, paint thinners, solvents, cleaning fluids, etc. during use.</p>	<p>Task-specific RAMS will be prepared and reviewed in advance. Personnel will be trained in the correct handling and use of chemicals, as well as in spill prevention awareness, including the use of spill kits. Spill kits will be readily available to manage any minor spills.</p> <p>All hazardous substances will be accompanied by a Safety Data Sheet (SDS), detailing safe handling and usage procedures. All chemical handling must comply with the guidance provided in the relevant SDS.</p> <p>Control of Substances Hazardous to Health (COSHH) assessments will be conducted for any development-specific hazardous substances. Segregated storage facilities will be used to ensure proper separation of hazardous materials. Where applicable, chemicals will be selected, stored, and managed in accordance with relevant legislation and regulatory requirements.</p>	Low	Tier 1

## **5 Response procedures and checklists**

### **5.1 Pollution incident response procedure**

#### **5.1.1 Introduction**

5.1.1.1 Any actual or potential spill into the marine environment, that has the potential to impact a marine receptor, regardless of size or source, will be reported according to Sections 5.1.2 to Sections 5.1.4 whenever a contractor or subcontractor is working at Morven North or Morven South. Any actual or potential spills will be recorded and reported internally following the MvOWL Incident Report and Management Procedure.

5.1.1.2 In the event of a spill, priority should be given to ensure the safety of personnel, offshore installations and vessels, and to prevent the spill from escalating.

5.1.1.3 Should the spillage be part of a wider emergency, such as fire or explosion, reference should also be made to the ERCoP, which will be produced post-consent.

#### **5.1.2 Spills originating from a vessel - response and notification overview**

5.1.2.1 In the event of a marine pollution incident (hydrocarbon or chemical), where the spill originates from a vessel or a vessel related activity, during construction or O&M at Morven North or Morven South, the steps described below should be followed:

- report the spill to the Vessel Master as soon as it is observed;
- the contractor or subcontractor Vessel Master must report any spill to the Applicant Environmental Manager and Marine Coordinator (or similar). The Vessel Master shall also notify the MCA via the CGOC by phone as soon as it is safe.

5.1.2.2 Where external notification is required, verbal reports shall, where practicable be followed by a Marine Pollution Report (POLREP) to the CGOC, with the Applicant Environmental Manager and Marine Coordinator (or similar) copied or otherwise notified in accordance with MvOWL Incident Reporting and Management Procedure. The contractor or subcontractor responsible for the vessel where the spill originated must activate the vessel's SOPEP, take primary responsibility for managing the incident, provide ongoing status updates, and initiate response or clean-up actions as needed. As the primary responder, the contractor or subcontractor will request assistance from a specialist spill response contractor if required. The Marine Coordinator will support the response and facilitate communication throughout the incident in accordance with MvOWL incident management plan, engaging the Incident management team and other appropriate support functions as required. Based on the currently anticipated type and volume of hydrocarbons and chemicals, a Tier 2 or Tier 3 response is not generally expected. However, escalation shall be undertaken where required by the nature, scale, location or potential consequences of the incident, and the MCA may take charge of the situation and implement the NCP (MCA, 2014). The Marine Coordinator shall then notify the relevant Applicant Personnel in accordance with the MvOWL Incident Management Plan, to ensure that appropriate support is provided in line with the approved response arrangements

#### **5.1.3 Spills originating from an installation associated with Morven North or Morven South – response and notification overview**

5.1.3.1 The following steps should be followed when the spill originates from an installation associated with Morven North or Morven South:

- report the spill to the Marine Coordinator as soon as it is observed.

5.1.3.2 The Marine Coordinator must report any spill to the CGOC by phone as soon as it is safe, followed by a call to the Applicant Environmental Manager. When practicable, verbal reports should be followed up with a Marine POLREP sent by email (or fax) to the CGOC. The Marine Coordinator will

activate the MPCP and take primary responsibility for coordinating the incident response. The Marine Coordinator is responsible for ongoing spill status reporting and will coordinate the initial response with the spill observer, who may use spill kits on the offshore installation. If needed, the primary responder will request support from a specialist spill response contractor. The type and volume of hydrocarbons and chemicals on the wind turbines and OSPs/offshore converter station platforms are not generally anticipated to have the potential to result in a Tier 2 or Tier 3 response (Table 4.1), due to volume and type of chemical. It is therefore not anticipated that the implementation of a NCP would be required but remains possible depending on incident circumstances. Where external notification is required, verbal reports shall, where practicable, be followed by a POLREP in accordance with MvOWL Incident Reporting and Management Procedure and the MCA will be kept informed.

#### **5.1.4 Spills within a port**

- 5.1.4.1 For port/harbour spills the contractor/subcontractor will contact the relevant port/harbour authority in the first instance and follow all port processes as advised. Each contractor MPCP will provide details of all ports/harbour authorities of relevance.
- 5.1.4.2 Before starting work, the contractor or subcontractor must provide details of the main ports or harbour authorities expected to be used for Morven North or Morven South operations. Contact information will be updated accordingly. All incidents, whether within the Morven North or Morven South working area or elsewhere, will be reported in a timely manner, to both the Applicant Environmental Manager and the Marine Coordinator (or similar).

### **5.2 Reporting requirements**

- 5.2.1.1 There is a requirement for all employees, contractors and subcontractors to report all accidents, incidents and hazards to the Applicant Environmental Manager and Marine Coordinator (or similar).
- 5.2.1.2 All incidents (including marine incidents) are required to be reported as soon as reasonably practicable in accordance with MvOWL Incident Reporting and Management Procedure.
- 5.2.1.3 In the event of a pollution incident, the spill observer shall notify the Applicant Environmental Manager and/or the Marine Coordinator (or similar). The Applicant Environmental Manager and/or the Marine Coordinator (or similar) shall then notify the Vessel Master and Marine Coordinator (if not previously contacted). The Marine Coordinator shall then notify the MCA via the CGOC.
- 5.2.1.4 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 Applicant Environmental Manager and Marine Coordinator. The Vessel Master shall also notify the MCA via the CGOC.
- 5.2.1.5 Incidents shall be reported promptly, and where appropriate, reviewed and investigated following the event in accordance with MvOWL Incident Reporting and Management Procedure. Lessons Learned, corrective actions and any required changes to procedures or controls shall be identified and tracked through close-out.

#### **5.2.2 Statutory reporting requirements**

- 5.2.2.1 Marine pollution incidents shall be reporting in accordance with applicable statutory and regulatory requirements, including notification to the Marine Directorate, and SEPA for coastal waters where relevant (HM Government, 2018 Scottish Government, 2022).
- 5.2.2.2 The flow chart in Figure 5.1 should be followed for all responses.

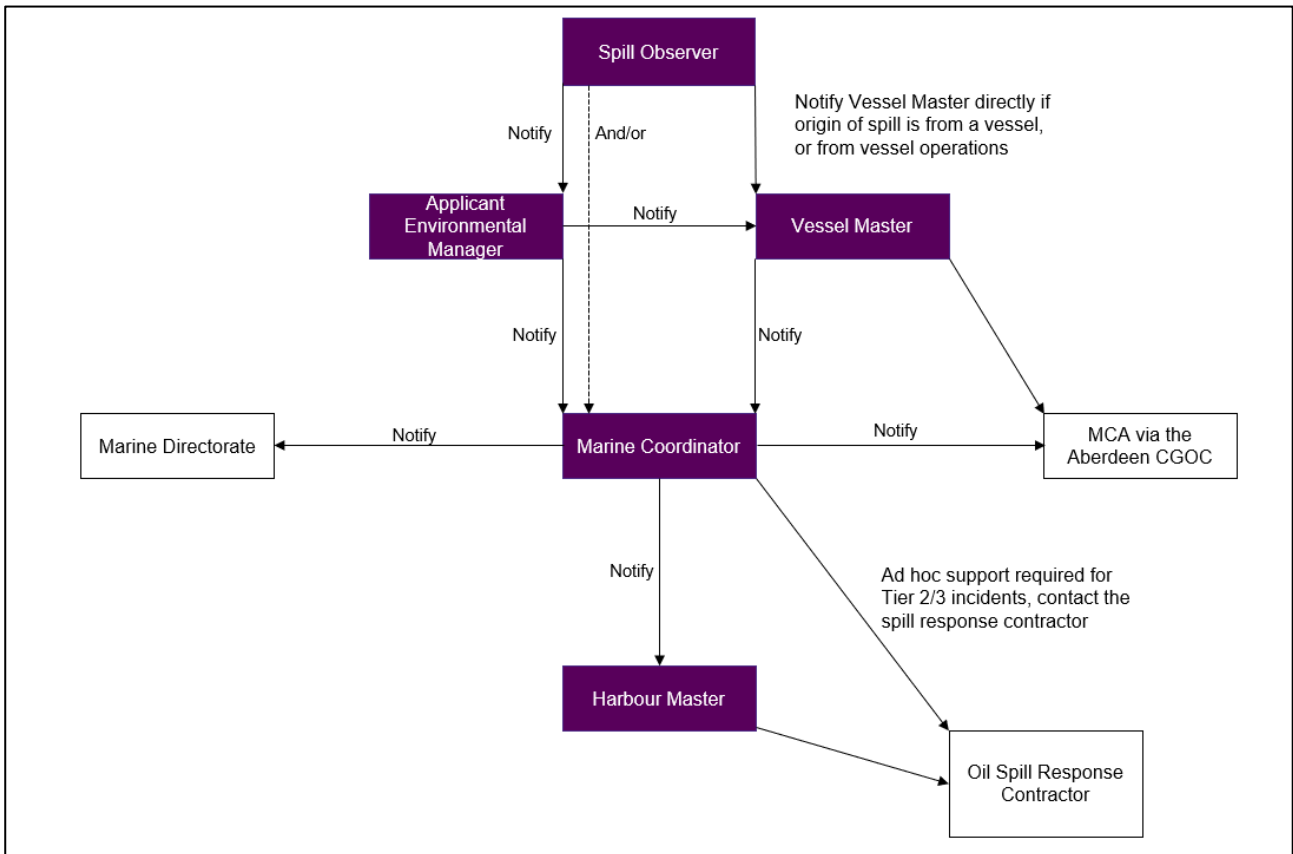


Figure 5.1: Reporting requirements for any potential spills

### 5.2.3 Response checklists

5.2.3.1 Table 5.1 to Table 5.4<sup>2</sup> provide suggested proformas summarising proposed key actions and notifications for key personnel identified in Figure 5.1 with which they would be expected to comply.

<sup>2</sup> The Harbour Master will notify Marine Scotland/SEPA and the MCA/Aberdeen CGOC, and any other relevant stakeholder, if a spill occurs in a harbour or port.

**Table 5.1: Spill observer**

Actions to be completed by the first person who observes the spill Spill scenario	
Initial actions	
(Please enter a tick (✓) once complete)	Notify the Applicant Environmental Manager and/or Vessel Master and provide details of: <ul style="list-style-type: none"> <li>• time;</li> <li>• possible source of spill;</li> <li>• current spill location;</li> <li>• oil/chemical type;</li> <li>• estimation of quantity of oil/chemical spilled;</li> <li>• any other relevant details.</li> </ul>
	Contact all personnel in the vicinity of the spill and warn of the potential hazard.
Ongoing actions	
	If it safe to do so, stay in vicinity of the spill and continue observation.
	If it safe to do so, take any reasonable action to isolate the source of the spill.

**Table 5.2: Applicant Environmental Manager (or similar) and/or Vessel Master**

Actions to be completed by the Applicant Environmental Manager and/or Vessel Master	
Initial actions	
(Please enter a tick (✓) once complete)	Receive report on spill from spill observer and take charge of the situation.
	If it is safe to do so, immediately initiate actions to identify/stop the spill source.
	Maintain safety of: <ul style="list-style-type: none"> <li>• personnel;</li> <li>• the deployment/vessel;</li> <li>• any vessel within 500m.</li> </ul>
	Applicant Environmental Manager and/or Vessel Master to notify Aberdeen GCOC by Very High Frequency (VHF) radio (note that GCOC must be notified regardless of location).
	Applicant Environmental Manager and/or Vessel Master to notify Harbour Master by VHF radio.
	Activate the relevant SOPEP or equivalent vessel specific spill plan if the spill originated from a vessel.
	Initiate a chronological log of events and actions taken – maintain this log until stand down.
Ongoing actions	
	Inform the Marine Coordinator of the spill and jointly assess the situation and the required resources to tackle the spill. Classify the spill size with the Marine Coordinator.

Actions to be completed by the Applicant Environmental Manager and/or Vessel Master	
	Confirm spill source and estimate quantity of oil/chemical spilled. Determine the likely spill movement.
	Ensure all other installations and vessels in the vicinity have been informed of the spill if deemed necessary.
	If no risk to personnel or installation, request/use vessel to track spill location and take photographs of the spill.
	In most cases (i.e. a Tier 1 spill), unless there are compelling reasons to do otherwise, the spill will be monitored and allowed to disperse naturally.
	Natural dispersion of spilt oil can be encouraged by 'prop-washing' – steaming at speed through the oil slick, creating a wash with the vessels' propeller and wake. This should only be done if appropriate to the scenario and the Vessel Master deems it to be safe.
	Assess the ongoing nature of the spill and the possible need to mobilise additional resources. Maintain close contact with the Marine Coordinator in making this assessment. If the spill incident escalates, command and control of the spill will be passed to the Marine Coordinator.
	If the spill is an oil spill, samples of the spill to be taken if the incident is a Tier 2/3 incident.
Ongoing Actions	
	At the end of the incident, stand down the response and prepare a report of the incident for the Applicant.

**Table 5.3: Marine Coordinator (or similar)**

Actions to be completed by the Marine Coordinator	
Initial actions	
(Please enter a tick (✓) once complete)	On notification of a pollution incident from the Applicant Environmental Manager/Vessel Master, record all details of the incident and all incoming information and conversations, maintaining a chronological log of events (use incident log sheet in Section 8).
	On receiving notification from the Applicant Environmental Manager or Vessel Master, jointly assess the situation and the required resources to tackle the spill. Classify the spill size with the Applicant Environmental Manager or Vessel Master. If the spill is a Tier 1 spill, contractor will lead the spill response with the Applicant acting to monitor the response to the incident. If the spill is a Tier 2 spill, the Applicant will assume control of the incident with support from the relevant Port Authority and/or a spill response contractor.
	If the spill is a Tier 3 event, the Marine Coordinator will act as the Applicants primary liaison with the MCA and Secretary of State's Representative for Maritime Salvage and Intervention (SOSREP).
Ongoing actions	
	If the spill is a Tier 1 incident, monitor the contractor's response to the incident.
	Report the incident to the Marine Directorate via telephone as soon as possible (refer to section 9 for contact details). Give the Marine Directorate full information on the location of the incident, time, quantity spilled, movement and current spill status. Record the time of notification to the Marine Directorate.

<b>Actions to be completed by the Marine Coordinator</b>	
	Ensure Oil Spill Report (PON1 form) has been submitted to the Marine Directorate within 12 hours of the incident occurring.
	Ensure the spill is being tracked and determine likely movement (e.g. towards other installations/environmentally sensitive areas/coastal areas).
	Work with the Applicant Environmental Manager or Vessel Master to prevent or reduce further spillage without endangering the safety of personnel.
	Ensure all other installations and vessels in the vicinity have been informed of the spill if deemed necessary.
	Notify other internal and external stakeholders as appropriate, such as the Applicant management, other Regulators, etc.
	Ensure that photographs of the spill are taken by the vessel crew. If the spill is an oil spill, ensure that samples of the spill are taken if the incident is a Tier 2/3 incident, if safe to do so.
	In co-operation with the Applicant Environmental Manager/Vessel Master, ensure that the spill is monitored until complete dispersion.
	<p>In the event that the proponents' on site resources are not able to adequately respond to the existing spill, or if the existing spill is likely to escalate (i.e. a Tier 2 spill), request support from the relevant Port Authority and/or a spill response contractor.</p> <p>Seek advice from the relevant Port Authority or Tier 2 spill response contractor on the following:</p> <ul style="list-style-type: none"> <li>• overall extent and ongoing nature of spill;</li> <li>• direction of movement, especially noting other installations and vessels in the vicinity;</li> <li>• proximity to environmentally sensitive areas;</li> <li>• areas possibly in need of urgent response measures.</li> </ul>
	Work with the relevant Port Authority/Spill Response contractor to manage the incident.
	Ensure that a daily notification is made to the Marine Directorate for the duration of the incident.
	<p>If the spill is a Tier 3 response</p> <ul style="list-style-type: none"> <li>• Coordinates the implementation of SOSREP Safety Directions and national response decisions.</li> <li>• Oversees contractor mobilisation, vessel operations and surveillance activities under the MPCP.</li> <li>• Ensures accurate SITREP (situation report) production, comprehensive record-keeping and support for cost recovery.</li> </ul>
<b>Close out actions</b>	
	<p>In co-operation with the Harbour Master, make an assessment of when to demobilise the response. Commence "stand down" procedures as follows:</p> <ul style="list-style-type: none"> <li>• ensure the Marine Directorate are informed of the final state of the spill incident;</li> <li>• ensure all vessels, contractors, local authorities and any external resource suppliers, etc. are contacted, notified of the end of the incident and stood down;</li> <li>• remain accessible to support personnel in compiling their reports.</li> </ul>
	Collect copies of Incident Logs.

Actions to be completed by the Marine Coordinator	
	Carry out internal reporting of the incident as necessary. Ensure that a “lessons identified” profile is available quickly so that remedial action and the possible upgrading of procedures can take place.

**Table 5.4: Harbour Master**

Actions to be completed by the Harbour Master	
<b>Initial actions</b>	
(Please enter a tick (✓) once complete)	On notification from the Marine Coordinator, Application Environmental Manager and/or Vessel Master, record all details of the incident and all incoming information.
	Notify the MCA via the CGOC and other vessels/installations in the vicinity if necessary.
<b>Ongoing actions</b>	
	In the event that the spill is a Tier 1 spill, monitor the response to the incident. Request confirmation from the Harbour Master’s Operations Manager that the spill is being managed effectively.
	In the event that the spill is a Tier 2 spill, provide assistance to the Applicant in managing the response as per the relevant Port Authority Oil Pollution Contingency Plan.
	In the event of a Tier 3 incident, assume overall command and control of the incident in co-operation with the MCA as per the relevant Port Authority Oil Pollution Contingency Plan. However, it should be noted that a Tier 3 incident from activities associated with the Array are considered highly unlikely.
<b>Close out actions</b>	
	For a Tier 2 response, in consultation with the Harbour Master’s Operations Manager, make an assessment of when to demobilise the response. Commence “stand down” procedures as follows: <ul style="list-style-type: none"> <li>• ensure all vessels, contractors, subcontractors, local authorities and any external resource suppliers, etc. are contacted, notified of the end of the incident and stood down;</li> <li>• remain accessible to support personnel in compiling their reports.</li> </ul>
	Ensure that a “lessons identified” profile is available quickly so that remedial action and the possible upgrading of procedures can take place.
	Organise an internal ‘cold wash’ meeting to review and discuss the incident, learning points and the possible upgrading of procedures.

## 5.3 Response strategies

### 5.3.1 Response strategies for Tier 1 incidents

5.3.1.1 The key response strategy for Tier 1 spills will be to allow natural dispersion, together with monitoring and evaluation using a small vessel. This is the best option for Tier 1 spills of water-soluble chemicals, or light oils such as diesel or hydraulic oil. Natural dispersion can be encouraged using a technique called ‘prop-washing’.

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## **5.3.2 Response strategies for Tier 2/3 incidents**

- 5.3.2.1 It is expected that any spills associated with Morven North and Morven South will be Tier 1 spills due to the small inventories of oil/chemicals and the low-risk nature of activities to be carried out.
- 5.3.2.2 In the event of a Tier 2 incident, it is expected the Marine Directorate will request assistance from the relevant Port Authority with regards to access to the stockpile of pollution response equipment, and the relevant Port Authority as an Oil Spill Response Co-operative known as the Oil Clean Up Committee. Access to this stockpile is by mutual agreement between the Marine Directorate and the relevant Port Authority.
- 5.3.2.3 The decision on whether to engage a Tier 2/3 contractor would likely be made by the relevant Port Authority in consultation with the Marine Directorate. The relevant Port Authority Tier 2 contractor will be confirmed post-consent. They will store and maintain a stockpile of equipment. In the event of a Tier 2 incident, the contractor response will be managed by the relevant Port Authority (in ongoing consultation with the Marine Directorate where required).
- 5.3.2.4 Figure 5.2 details the environmental sensitivities in the vicinity of Morven North and Morven South that will require consideration during a Tier 1 to 3 spill.

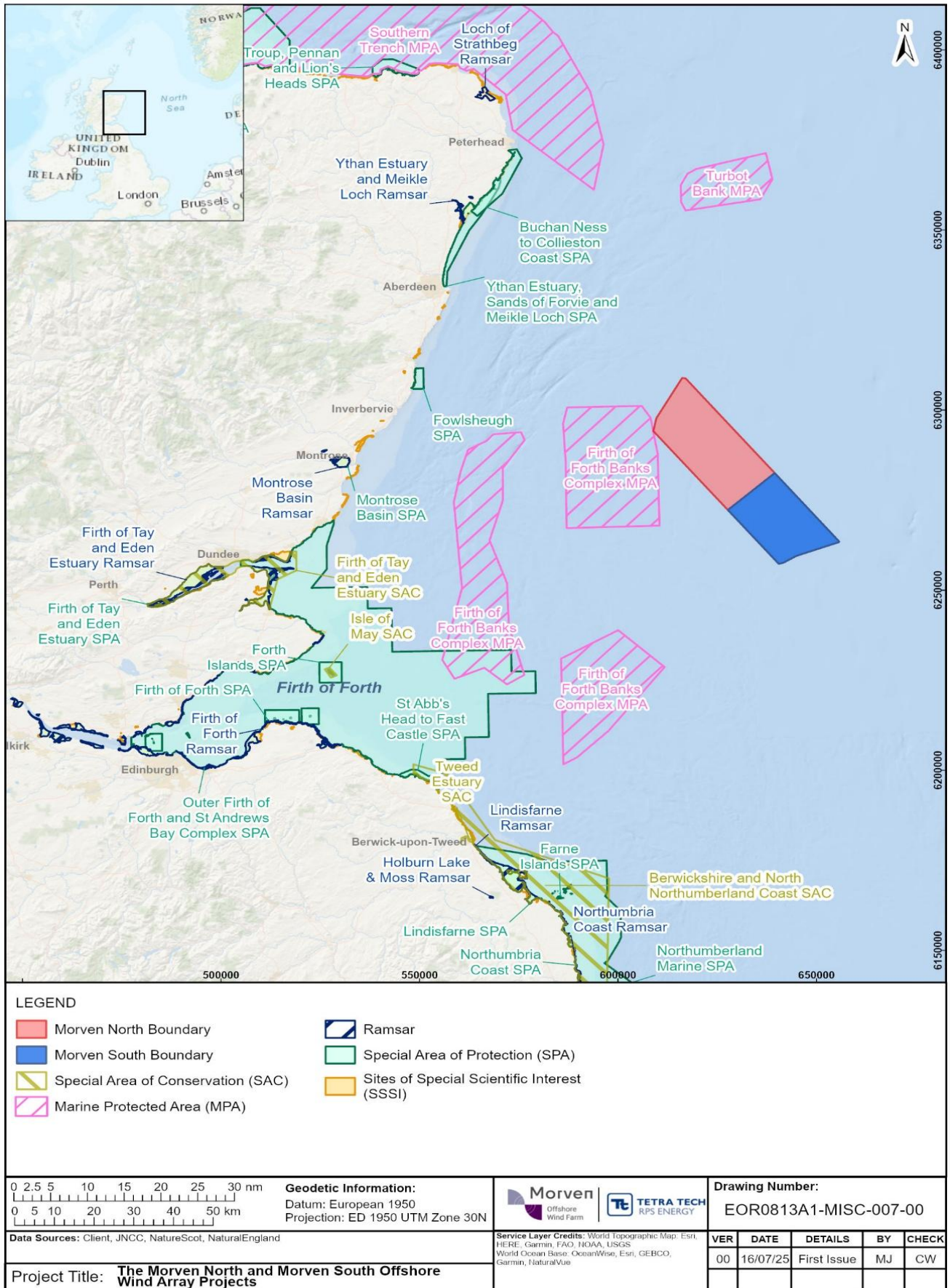


Figure 5.2: Environmental sensitivities within the immediate vicinity of the Morven North and Morven South Boundaries

## 6 Proposed Spill proforma

6.1.1.1 Table 6.1 provides a suggested proformas for spill response. Details will be updated pre-construction.

**Table 6.1: Proposed spill proforma**

Spill Risk Proforma – to be completed for each new equipment deployment				
Name of Assessor:				
Date:				
Equipment Type/Brief Description of Equipment:				
Liquid Inventories	Product Name	Product type	Volume (litres)	Location
Reviewed by Operations Manager:				
Date:				
Information Accepted by Marine Directorate?	Yes – mark as approved No – explain to proponent what further information is needed			
Signed off by Operations Manager:				
Name:				
Date:				

## 7 Proposed spill assessment checklist

7.1.1.1 Table 7.1 provides a suggested proformas for spill assessment checklist. Details will be updated pre-construction. This checklist is to be completed by the Applicant Environmental Manager or Vessel Manager.

**Table 7.1: Proposed Spill Assessment Checklist**

Spill Assessment Checklist	
<p>This checklist is designed to assist those personnel who have the responsibility of assessing a spill incident. These personnel are likely to be:</p> <ul style="list-style-type: none"> <li>• Applicant Environmental Manager</li> <li>• Vessel Master.</li> </ul>	
Step	Guidance
Determine Essential Details	Location of pollution incident; Source of spill; Oil/chemical type; Extent of spill; Time of incident; Potential hazardous circumstances; Any other relevant information (particularly: is spill contained or ongoing?).
Assess Safety Hazards	Until otherwise established, assume an oil spill is giving off potentially dangerous Volatile Organic Compounds (VOCs) (i.e. hydrocarbon vapours). <b>ELIMINATE IGNITION SOURCES</b> Approach spill from upwind to reduce effects of vapours. <b>APPROACH ONLY IF SAFE TO DO SO!</b>
Determine Spill Source	If source unknown, investigate with care. Instigate actions to stop spillage at source. <b>IF SAFE TO DO SO!</b>
Estimate Quantity	Estimate quantity of release if exact amount unknown.
Determine movement	Determine direction and speed of spill movement based upon the prevailing wind and sea conditions.
Assess prevailing and if possible future weather conditions	Determine: <ul style="list-style-type: none"> <li>• Wind speed and direction;</li> <li>• State of tide;</li> <li>• Current speed and direction; and</li> <li>• Sea state.</li> </ul>

## 8 Pollution incident log

8.1.1.1 Table 8.1 provides a suggested proformas for a pollution incident log. Details will be updated pre-construction. An incident log must be completed by all personnel involved in the spill response.

**Table 8.1: Pollution Incident Log**

Name:	
Team:	
Role:	
Location:	
Date/Time:	Communication/Action Taken/Notes

## 9 Contacts directory

9.1.1.1 Table 9.1 presents a proposed contacts directory.

**Table 9.1: Contacts Directory**

Organisation	Contact	Telephone (office hours)	24 hr Telephone	Mobile/Pager/Emails
<b>The Applicant</b>				
Applicant Environmental Manager (TBC)				
Marine Coordinator (TBC)				
<b>Marine Directorate</b>				
Incident Communication Centre				
<b>Coastguard and MCAs</b>				
Aberdeen CGOC				
MCA				
<b>Port Authorities</b>				
<b>Other Installations</b>				
<b>Environmental Agencies</b>				

Organisation	Contact	Telephone (office hours)	24 hr Telephone	Mobile/Pager/Emails
<b>Emergency Services</b>				
Ambulance				
Fire				
Pollution				
<b>Local Authorities</b>				
<b>Other Contacts (for information, advice or appointment of ad-hoc spill response contractor)</b>				

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## 9.2 References

HM Government (2018). *Guidance - How to respond to marine pollution incidents*. Available at: How we respond to marine pollution incidents - GOV.UK. Accessed on: 03 November 2025.

HM Government (2024). *The United Kingdom National Contingency Plan for Responding to Marine Pollution Incidents*. Available at: National Contingency Plan – A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations. Accessed on: 03 November 2025.

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