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Volume 7 Standalone Appendices

Appendix 12 Caledonia South Outline Offshore Environmental
Management Plan

Caledonia Offshore Wind Farm Ltd

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Acronyms and Abbreviations

CaP	Cable Plan
CEMP	Construction Environmental Management Plan
CFLO	Company Fisheries Liaison Officer
CLO	Community Liaison Officer
ECoW	Environmental Clerk of Works
EIAR	Environmental Impact Assessment Report
EMP	Environmental Management Plan
EMS	Environmental Management System
ERCoP	Emergency Response Cooperation Plan
FIR	Fishing Industry Representative
FLO	Fisheries Liaison Officer
HMCG	His Majesty's Coastguard
IEMA	Institute of Environmental Management and Assessment
IMS	Integrated Management System
INNS	Invasive Non-native Species
MD-LOT	Marine Directorate - Licencing Operations Team
MINNS	Marine Invasive Non-native Species
MMMP	Marine Mammal Mitigation Protocol
MMO	Marine Management Organisation
MMOb	Marine Mammal Observer
MPCP	Marine Pollution Contingency Plan
NtM	Notice to Mariners

OECC	Offshore Export Cable Corridor
OFLO	Offshore Fisheries Liaison Officer
PAD	Protocol for Archaeology Discoveries
PEMP	Project Environmental Monitoring Programme
QHSE	Quality, Health, Safety and Environment
UXO	Unexploded Ordinance
WMP	Waste Management Plan
WSI	Written Scheme of Archaeological Investigation
WTG	Wind Turbine Generator

1 Introduction

1.1 Purpose and Scope

- 1.1.1.1 This Outline Offshore Environmental Management Plan (EMP) accompanies the Environmental Impact Assessment Report (EIAR) for Caledonia South. A separate Outline Offshore EMP document has been prepared in relation to Caledonia North (Volume 7, Appendix 11).
- 1.1.1.2 The purpose of this Outline Offshore EMP is to establish the framework to inform the Final Offshore EMP for Caledonia South which will be completed post-consent and prior to construction. The Final Offshore EMP will be reviewed before the Operation and Maintenance (O&M) and decommissioning phases.
- 1.1.1.3 This Outline Offshore EMP sets out the environmental management approach and controls that will be put in place and adopted by Caledonia Offshore Wind Farm Limited (hereafter referred to as 'the Applicant'), in addition to contractors and sub-contractors as appropriate. The purpose of these measures is to protect the environment during the construction and operation of Caledonia South. It includes defined roles and responsibilities relating to environmental management, reporting procedures put in place to manage specific environmental issues (e.g. waste management, pollution prevention) as well as management measures to prevent adverse environmental impacts (e.g. introduction of invasive non-native species (INNS)).
- 1.1.1.4 An Outline Construction Environmental Management Plan (CEMP) has been produced alongside this Offshore EMP and will be implemented to manage the specific environmental risks associated with construction of the Proposed Development (Onshore) (Volume 7, Appendix 10).
- This Outline Offshore EMP has been prepared in accordance with the Institute of Environmental Management and Assessment (IEMA) Guidance on Environmental Management Plans (IEMA, 2008¹).

1.2 Objectives

- 1.2.1.1 The main objective of the Offshore EMP is to ensure that all embedded mitigation measures and monitoring commitments as presented in the EIAR (Volume 7, Appendix 9: Caledonia South Schedule of Mitigation) are implemented. These commitments are required for the avoidance, minimisation and control of any environmental impacts associated with Caledonia South.
- 1.2.1.2 Once finalised, all of the Applicant's personnel, contractors and sub-contractors shall be expected to comply with the Offshore EMP.

1.3 Approach to Updating and Amending the EMP

- 1.3.1.1 The Final Offshore EMP will be produced prior to construction and will set out the controls and processes that are to be adopted to mitigate environmental impacts of Caledonia South. The Offshore EMP is an iterative document that develops throughout the development and refinement of the project detailed design process, its procurement and construction.
- 1.3.1.2 Requirements within the Offshore EMP will be communicated to all contractors associated with the design, construction and installation of Caledonia South, where relevant, to discharge the relevant licence conditions and to communicate environmental requirements and standards to facilitate incorporation into their EMPs.
- 1.3.1.3 The Offshore EMP will be the responsibility of the Applicant to manage in close working with the contractors.

1.4 Consent Compliance

- 1.4.1.1 This Outline Offshore EMP forms part of the EIAR submission for consent and to seek approval for the commitments within this Offshore EMP prior to the commencement of construction activities in relation to Caledonia South. As noted in Section 1.3, this Offshore EMP is a live document and will be further developed in accordance with the requirements of the relevant consent conditions and in consultation with relevant stakeholders.
- 1.4.1.2 Table 1-1 details where within the Offshore EMP specific consent condition requirements are addressed, noting the information in this table will be populated once consents are received.

Table 1-1: Caledonia South Consents.

Consent/Licence Reference	Condition	Relevant Offshore EMP Section

1.5 Plan Structure

- 1.5.1.1 This Outline Offshore EMP is divided into two Parts.
- 1.5.1.2 Part 1 includes information on management, implementation and communication, including information on:
- Roles and Responsibilities;
 - Communications and Reporting Procedures; and
 - Environmental Training and Awareness

1.5.1.3 Part 2 includes information on environmental impacts and control measures relevant key environmental aspects of Caledonia South with specific reference to the register of potential environmental impacts and mitigation commitments. This includes:

- Overarching environmental management and compliance;
- Marine Invasive Non-native Species (MINNS) and biosecurity;
- Marine species;
- Marine archaeology;
- Dropped objects;
- Unexploded ordinance (UXO);
- Chemical management; and
- Waste management.

1.6 Other Relevant Documents

1.6.1.1 Once finalised during the post-consent stage, the Offshore EMP will be one of a suite of plans produced for Caledonia South required under the conditions of the Section 36 Consent and associated Marine Licences for Caledonia South. The full list of final consent plans is not currently known; however, these are likely to include:

- Marine Mammal Mitigation Protocol (MMMP)
- Marine Pollution Contingency Plan (MPCP);
- Fisheries Management and Mitigation Strategy (FMMS);
- Navigational Safety Plan (NSP);
- Emergency Response Cooperation Plan (ERCoP);
- Cable Plan (CaP);
- Pilling Strategy (PS);
- Written Scheme of Archaeological Investigation (WSI);
- Vessel Management Plan (VMP);
- Project Environmental Monitoring Programme (PEMP); and
- Decommissioning Plan.

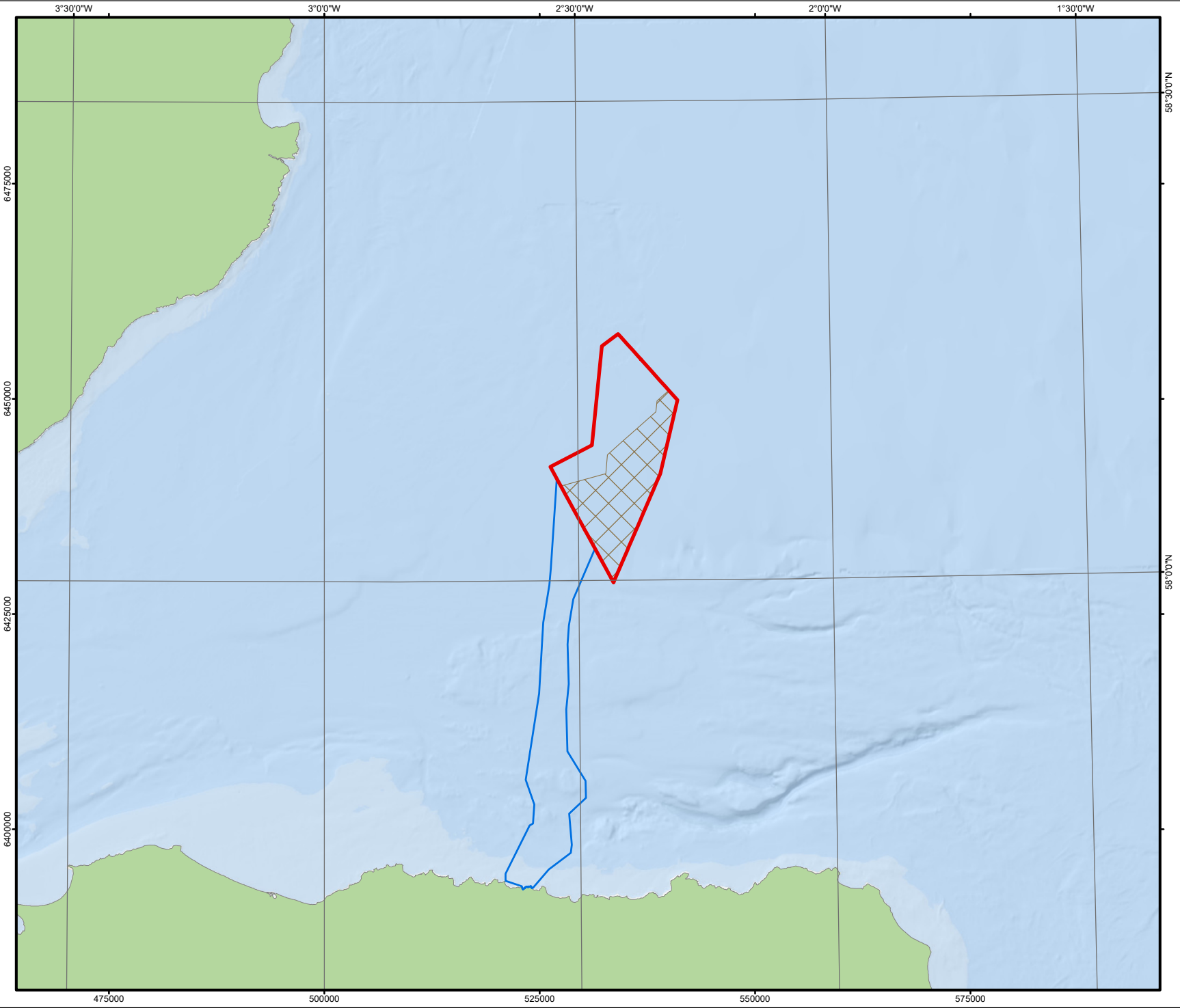
1.6.1.2 The Final Offshore EMP and all other required consent plans will be developed once further detailed design work has been completed for Caledonia South and post-consent requirements and consent conditions are agreed. The consent plans will be prepared in consultation with key stakeholders for submission to, and approval by, Marine Directorate - Licencing Operations Team (MD-LOT) prior to the commencement of construction.

2 Project Background

2.1.1.1 Caledonia South is located within the NE4 Plan Option identified in the Scottish Government's Sectoral Marine Plan (SMP) for Offshore Wind Energy (Scottish Government, 2020²). The Caledonia South Site (Array Area) is approximately 204.5km² in size with the southern limit of the site being approximately 38km from Banff, Aberdeenshire (Figure 2-1).

2.1.1.2 A summary of the infrastructure within Caledonia South is provided below:

- Up to 78 Wind Turbine Generators (WTGs) to be installed across Caledonia South using bottom-fixed foundations or a combination of bottom-fixed and floating foundations;
- Up to two Offshore Substation Platforms (OSPs) which transform electricity generated by the WTGs to a higher voltage allowing more efficient transmission to shore;
- Inter-array cables which connect the WTGs together;
- An interconnector cable which connects the Caledonia South OSPs to each other; and
- Up to two offshore export cable circuits within the Caledonia South Offshore Export Cable Corridor (OECC) which will be laid between the OSPs and Landfall Site at Stake Ness, Aberdeenshire.



Caledonia South Site

Caledonia South Offshore Export Cable Corridor

Proposed Floating Area

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05 km

01	16/09/2024	Approved	EV	BB	DH
REV	DATE	DOC STATUS	ORIGIN	REVIEW	APP

CALEDONIA

Offshore Wind Farm

GoBe

APEM Group

CONTRACTOR DRAWING NO UKCAL1_GO_WNF_GEN_MAP_00333		CONTRACTOR REV 01	
GEOGRAPHIC PARAMETERS WGS 84 / UTM zone 30N (EPSG: 32630)			
DRAWING TITLE Figure 2-1: Location of Caledonia South, including the Caledonia South Site and the Caledonia South Offshore Export Cable Corridor (OECC)			
STATUS Approved		SCALE 1:600,000	
DRAWING NUMBER N/A		SHEET NO 01 of 01	REV N/A

3 Part 1: Implementation of the Environmental Management Plan

3.1 Roles and Responsibilities

3.1.1 Overview

- 3.1.1.1 This section of the Final Offshore EMP will set out the key roles and responsibilities of those involved in the construction or operation of the Caledonia South from an environmental perspective. This will include the identification of key site staff, their environmental management responsibilities and how these link with other members of the Caledonia South team, such as the Project Director, the Project Quality, Health, Safety and Environment (QHSE) Manager, and the Development Manager and/or Advisors along with environmental specialists such as Environmental Liaison Officer, Fisheries Liaison Officer (FLO), or Archaeologists, where relevant. The contact details for the key individuals listed will also be included in the Final Offshore EMP.
- 3.1.1.2 All of the Applicant's personnel, contractors and subcontractors must comply with the requirements of the Final Offshore EMP and all relevant associated documents. Contractors and Subcontractors may have additional procedures but will comply with the mitigation and controls within the Final Offshore EMP as a minimum.
- 3.1.1.3 Table 3-1 describes the indicative roles and responsibilities relevant to the Offshore EMP, to be finalised post-consent. Additionally, it will be further refined as part of any required updates to this Offshore EMP during the various stages of Caledonia South. These roles will be further defined and agreed with MD-LOT prior to the commencement of construction activities.

Table 3-1: Roles and responsibilities for the implementation and management of the Offshore EMP (further details of the role responsibilities will be expanded on in the Final Offshore EMP).

Role	Responsibility
Project Director	Responsible for ensuring compliance with and delivery of the Offshore EMP through securing sufficient resources and implementing appropriate processes throughout the delivery of Caledonia South.
Quality, Health, Safety and Environment (QHSE) Manager	Responsible for the coordination, management and monitoring of QHSE matters relevant to the Offshore EMP. The QHSE Manager is responsible for providing QHSE support, advice and guidance, monitoring QHSE performance and for reducing the environmental effects of Caledonia South as far as practicable during construction and O&M works.
HSE Lead	Responsible for the day-to-day contact with Contractors and carrying out any inspections, audits and investigations. Also responsible for emergency response liaison with Marine Coordinator.
Development Manager	Overall responsibility for discharging consent conditions including managing the delivery of all consent plans including the Offshore EMP.
Head of Construction	Responsible for overseeing the construction activities of Caledonia South ensuring the necessary resources are available to the Package Managers in order to implement the environmental management measures detailed within the Offshore EMP.
Package Manager	Responsible for supporting the Development Manager with similar responsibilities but focussed on specific package/work streams.
Marine Coordinator	Responsible for managing and monitoring vessel activity. This will include the compilation of relevant documents for communication to the fishing industry, such as Notices to Mariners (NtMs), Information to Sea Users Bulletins (Kingfisher Bulletin) and Weekly Notices of Operations that will be issued to the FLO for distribution to the fishing industry via the Fishing Industry Representatives (FIRs).
Independent Environmental Clerk of Works (ECoW)	Responsible for the quality assurance of final draft versions of all consent plans and programmes required under the Section 36 Consent and Marine Licences, providing on-going advice, monitoring and reporting of compliance with the consent conditions and all environmental mitigation and monitoring measures included in the application for Caledonia South. The ECoW will also be involved with providing environmental training and will establish communication and reporting protocols for issues relating to the environment.

Role	Responsibility
Contractor Environmental Advisor	Responsible for ensuring the contractor's compliance with all environmental responsibilities in the Offshore EMP and supporting documents during the construction and O&M stages of Caledonia South.
Community Liaison Officer (CLO)	Point of contact for residents neighbouring Caledonia South and local authorities.
Retained Archaeologist	Responsible for supporting the Development Manager in relation to archaeological matters. The Retained Archaeologist will be in place throughout the construction stage, and, if required, during the O&M stage.
Marine Mammal Observer (MMOb) (if required)	A MMOb may be in place during noisy activities, such as piling and other construction activities if required. These activities and the roles and responsibilities associated with the MMOb are outlined in the MMMP.
Company Fisheries Liaison Officer (CFLO)	Responsible for providing ongoing liaison and ensuring clear communication between Caledonia South and Commercial Fisheries (potentially via the FIR). The CFLO will maintain a database of fisheries contacts and organisations to ensure Project related information is circulated in a timely manner. The CFLO will also assist the Applicant in resolving fisheries issues as they arise and facilitate the relocation of static fishing gear, as required.
Offshore Fisheries Liaison Officer (OFLO)	Responsible for minimising any at-sea conflict between Caledonia South and fishing activities during the construction and O&M stage. The OFLO will be stationed on construction vessels, as required, and will act as an on-site point of communication for fishing vessels. The OFLO will maintain contact with the CFLO (based onshore) and the Applicant in order to communicate relevant information to fishing vessels.

3.1.2 Contact Details

- 3.1.2.1 A Caledonia South Contacts Sheet will be compiled prior to the commencement of construction of Caledonia South. This list will include contact details of all Applicant, Contractor/Subcontractor and relevant third parties. This list will be regularly updated throughout the construction and O&M phases of Caledonia South.
- 3.1.2.2 As a minimum, the Contacts Sheet will include the following information:
- Company/organisation;
 - Role/position;
 - Name;
 - Telephone/mobile number;

- Email address; and
- Office location.

3.2 Communications and Reporting Procedures

3.2.1 Internal Communications and Reporting

- 3.2.1.1 Details of the type and frequency of internal communications and reporting procedures will be confirmed in the Final Offshore EMP; however they are likely to include regular progress meetings before and during construction, O&M activities, between the Applicant personnel and relevant contractors/subcontractors, including the ECoW as required.
- 3.2.1.2 Reviews of contractors/subcontractor Risk Assessment and Method Statements will be undertaken and copies of the relevant consents will be provided to the contractors and/or subcontractors. Contractors and/or subcontractors will be made aware of the consent obligations associated with a particular activity via environmental training and awareness sessions detailed in Section 3.3.
- 3.2.1.3 All Applicant personnel, Contractors and Subcontractors will report any environmental concerns or issues, including on-site potential or actual environmental incidents or emergencies, immediately.

3.2.2 External Communications and Reporting

- 3.2.2.1 External communications, notifications and reporting in relation to Caledonia South activities will be carried out in accordance with the commitments included in the EIAR and the requirements of the consent conditions.
- 3.2.2.2 The Applicant will liaise with MD-LOT and relevant external stakeholders on matters relating to environmental management post-consent to agree appropriate communication and reporting protocols.

3.3 Environmental Training and Awareness

- 3.3.1.1 This section will contain details of the training and awareness requirements which contractors will be required to adhere to for the duration of the construction of Caledonia South.
- 3.3.1.2 The Development Manager, Contractor's Environmental Manager and/or ECoW will be responsible for providing environmental training and promoting awareness regarding environmental management. Toolbox talks, inductions and environmental training will be supported by the ECoW for expert advice and support. Table 3-2 presents potential methods for environmental training and awareness raising.

Table 3-2: Methods for providing environmental training and raising awareness (details to be finalised post-consent).

Method	Description
Induction	<p>Environmental induction training will be presented to all the personnel working and visiting the site (Caledonia South personnel, contractor/subcontractor employees, suppliers and other visitors) to inform them of the content of the Offshore EMP that is applicable to them.</p> <p>The following details, as a minimum, will be provided to all inductees:</p> <ul style="list-style-type: none"> ▪ Description of the specific environmental risks relevant to the inductees' work onsite; ▪ Description of the main environmental aspects of concern at the site; ▪ Species and/or habitat protection requirements; ▪ Archaeological safeguarding measures; ▪ Pollution prevention measures; ▪ Waste management measures; and ▪ Plant service and repair procedures.
Toolbox talks	<p>Toolbox talks delivered by specialist staff on-site to discuss any update to the Offshore EMP relevant to the personnel on-site. This may include specific information on risks and mitigations to be implemented for specific activities, environmental issues arising on-site to ensure continuous training and to reinforce environmental awareness.</p>
Environmental training	<p>Environmental awareness training covering a variety of topics including (but not limited to) the use of spill kits, waste management, fuel handling and ecologically and archaeologically sensitive areas. Contractors will prepare a full schedule of training (timing and content) and include this in their EMPs. The provision of environmental training will be audited on a regular basis.</p>
Lessons learned	<p>Either as part of or in addition to any audit, inspection or investigation, the contractors shall conduct 'lessons learned' sessions as required. As a minimum, Caledonia South personnel and the contractors shall conduct a joint lessons learned session on an annual basis but may consider these relevant at different stages of the project. Should this process, or any other, generate environmental information worth sharing, the Applicant shall inform MD-LOT and the wider industry.</p>
Awareness materials	<p>In addition to the methods described above other awareness material will be made available on environmental notice boards. These will be prominently displayed to allow all personnel access to review the information on a daily basis and will be regularly updated.</p> <p>The following information, as a minimum, will be provided on the notice boards:</p> <ul style="list-style-type: none"> ▪ Description of the key environmental risks alongside the risk mitigation measures; ▪ The Environmental Constraints/Risk Map illustrating the location of the environmental sensitivities and the required zones of exclusion; ▪ Location of emergency response equipment; and ▪ Key contact numbers and responsible personnel.

3.4 Management of Complaints

- 3.4.1.1 The Applicant with the support of the contractor(s) will establish a process for handling all enquiries, including complaints. All enquiries will be recorded, and a log will be maintained to include details of the response and action taken. This will be available upon request for inspection to statutory stakeholders. All enquiries, whether a query or a complaint, will be dealt with in a timely manner. The ECoW will be immediately informed of any environmental-related issues that have been raised. The CFLO will be immediately informed of any fisheries-related issues that have been raised. Where appropriate, the ECoW/CFLO in consultation with the Applicant, will be responsible for informing relevant stakeholders and statutory bodies.

3.5 Environmental Incident Response

- 3.5.1.1 All incidents associated with activities throughout construction and O&M phases of Caledonia South, including environmental incidents and non-conformance with the measures set out in this Offshore EMP.
- 3.5.1.2 In the event of an emergency associated with Caledonia South, or at sea involving its personnel and/or vessels, the Applicant is responsible for providing immediate rescue and first aid medical response, to a level appropriate for the circumstances of Caledonia South and its location. The Applicant is also responsible for immediately alerting His Majesty's Coastguard (HMCG) of an emergency and for liaising and cooperating with the relevant Marine Rescue Centre to resolve the emergency. The Applicant is also obliged, under international maritime agreements and practices (e.g., Safety Of Life At Sea (SOLAS) convention), to provide assistance, where it is possible to do so, to other vessels or persons in danger at sea within or nearby Caledonia South, and/or when requested to assist by HMCG. The Applicant may also need to provide its own vessel(s) and other assets to respond or react to other maritime emergencies, such as a pollution event or a drifting vessel which presents an actual or possible threat to the safety of life or property at sea within or nearby Caledonia South.

3.6 Monitoring, Auditing and Reporting

- 3.6.1.1 To ensure compliance with this Offshore EMP and associated consent documentation, the Applicant and its contractors will develop a monitoring programme for Caledonia South, which will comprise both inspections and audits. Observations from inspections and audits shall be collected, recorded in inspection or audit template reports, and issued to contractors for closure of actions. The close out of these items will be required within designated timeframes.

- 3.6.1.2 Each contractor working on Caledonia South must maintain adequate records of environmental information and audits to demonstrate compliance with both legal and the Applicant's environmental requirements. The Applicant will assess compliance with relevant environmental legislation and consent commitments as part of the Caledonia South monitoring programme.
- 3.6.1.3 Audits will focus on compliance with this Offshore EMP and will be completed by the Applicant on key construction packages. Audits will be agreed and arranged with the contractors at least four weeks in advance and prior to any vessel mobilising to the project. All actions raised from the audit will be recorded by the Applicant and the contractors must address and close out actions in a timely manner.
- 3.6.1.4 A monthly report will be required from each contractor and sub-contractor which will be recorded and monitored by the Applicant. Required Data will be as follows:
- Environmental Near Miss Incidents;
 - Environmental Incidents; and
 - Notice from Regulatory Authority.
- 3.6.1.5 Confirmed Environmental Complaint Compliance with the Offshore EMP will be monitored through a series of audits carried out by the Contractor Environmental Advisor or Development Manager (where appropriate) throughout the construction and operational and maintenance phases. This will include a scheduled audit following the delivery of a toolbox talk, to ensure that the requirements and procedures have been understood. This may involve site visits and conversations with project personnel to monitor awareness.
- 3.6.1.6 The Contractor Environmental Advisor (where appropriate) will develop specific checklists, informed by review of this Offshore EMP and Contractor RAMS, to facilitate the audit process. The following environmental audits will be completed:
- The Applicant may carry out audits at any time, but at least once per quarter;
 - During construction, the Contractor Environmental Advisor will undertake environmental audits on a monthly basis and will maintain a record of all completed audit forms, and records of corrective action and close outs; and the Contractor Environmental Advisor will also undertake audits of sub-contractors, on a quarterly basis and provide an audit report to the Development Manager within two weeks of the audit being undertaken.

- 3.6.1.7 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. The Contractor Environmental Advisor will be delegated sufficient powers under the construction contract so that they will be able to instruct the Contractor to stop works and to direct the carrying out of emergency mitigation/clean-up operations. The Applicant will also have stop works authority, in the event of a non-conformance identified during an external audit.

4 Part 2: Environmental Management and Control Measures

4.1 Environmental Management Systems and Compliance

- 4.1.1.1 This section will provide an overview of the controls and procedures to be adopted to mitigate the environmental impacts associated with the Project. Commitments stated in the EIAR will be translated into an appropriate format allowing their practical implementation by Contractors and Subcontractors. This follows the IEMA Practitioner Guide (IEMA, 2008¹), which states the following:

"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, Proposed Development construction, and into the operational phase".

- 4.1.1.2 The Final Offshore EMP will form part of an Integrated Management System (IMS) that will guide the practical implementation of the commitments stated in the EIAR. All Contractors will have an Environmental Management System (EMS) appropriate to their scope of work.
- 4.1.1.3 The complete list of enhancement, mitigation and monitoring commitments is provided in the mitigation register (Volume 7, Appendix 9: Caledonia South Schedule of Mitigation). This register will be updated post-consent with any required consent conditions.
- 4.1.1.4 As the mitigation register is developed from the commitments made within the EIAR and in compliance with consent conditions, adherence to the Offshore EMP and associated plans, will ensure compliance with the consents awarded for Caledonia South in relation to environmental considerations.

4.2 The Management of Key Environmental Aspects

4.2.1 Marine Pollution Contingency Plan

- 4.2.1.1 Caledonia South's MPCP will align with the guidance set by the following (or more up to date guidance available at that time):
- Relevant Port Oil Spill Contingency Plans which set out how Harbour Authorities and other relevant organisations deal with an oil spill incident;
 - The Marine Management Organisation (MMO) Marine Pollution Contingency Plan (MMO, 2023³); and

- The United Kingdom National Contingency Plan for Responding to Marine Pollution Incidents (HM Government, 2024⁴).

4.2.2 Marine Invasive Non-Native Species and Biosecurity

- 4.2.2.1 The measures to be adopted for the management of Marine INNS (MINNS) during construction and O&M phases of Caledonia South will be set out in the MINNS Management Plan.

4.2.3 Marine Species

- 4.2.3.1 In the event of a wildlife incident occurring as a result of activity associated with Caledonia South (e.g., injury to a marine mammal, or an observed fish or bird mortality), the incident will be reported to the Development Manager or ECoW as soon as possible. Details of the activity being undertaken, pictures and weather conditions are the minimum information to be provided. The Development Manager or ECoW will follow up with the relevant regulatory authority, where appropriate.
- 4.2.3.2 The mitigation and management of potential impacts on marine species, particularly marine mammals will be provided within the following plans:
- MMMP (supported by Volume 7, Appendix 14: Caledonia South Draft Marine Mammal Mitigation Protocol);
 - Piling strategy;
 - VMP; and
 - CaP.

4.2.4 Marine Archaeology

- 4.2.4.1 The procedures to be followed on discovering any marine archaeology during the construction and O&M stages of Caledonia South will be set out in the Written Scheme of Investigation (WSI) and Protocol for Archaeology Discoveries (PAD). This Plan and Protocol will be developed and finalised post-consent.

4.2.5 Dropped Objects

- 4.2.5.1 All dropped objects deemed to be a hazard to safe navigation by the Applicant, Contractors or Subcontractors will be recorded and reported to MD-LOT via the appropriate dropped objects form (Marine Directorate, 2024⁵).

4.2.6 Unexploded Ordnance

- 4.2.6.1 Pre-construction surveys will identify potential UXO hazards within the boundaries of Caledonia South, with UXO removal/clearance activities, and/or construction micro-siting and cable re-routing, undertaken as required.
- 4.2.6.2 Should a UXO be discovered after the survey and clearance programme is completed the Applicant will be informed immediately via the relevant channels (details to be provided post-consent).

4.2.7 Chemical Management

- 4.2.7.1 The Applicant will ensure that all chemicals being used during the construction and O&M stages of Caledonia South have been approved by MD-LOT prior to use in an open system. For any chemicals used in a closed system, MD-LOT will be notified prior to use. Further information will be provided in the Offshore EMP post-consent.

4.2.8 Waste Management

- 4.2.8.1 A Waste Management Plan (WMP) will be prepared to deal with all aspects of waste produced during construction and O&M stages of Caledonia South. The WMP will use the waste hierarchy of reduce, reuse and recycle wherever possible. The following aspects will be included in the WMP as a minimum:
- Analysis of the waste arisings/material surpluses;
 - Specific waste management objectives for Caledonia South;
 - Methods proposed for prevention, reuse and recycling of wastes;
 - Material handling procedures; and
 - Proposals for education of workforce and plan dissemination programme.
- 4.2.8.2 In the event that the disposal of dredged sediment (associated with seabed preparation works or cable installation) is required, material will be deposited within an area of similar sediment characteristics, in close proximity to the dredge location in order to retain sediment within the sediment transport system. No material will be deposited outside the agreed disposal sites.
- 4.2.8.3 Details of contingency planning in the event of an accidental release of materials which could cause harm to the environment will be covered by the MPCP.

5 References

¹ Institute of Environmental Management and Assessment (IEMA) (2008) 'Environmental Management Plans'. Best Practice Series, Volume 12, December 2008

² Scottish Government (2020) 'Sectoral Marine Plan for Offshore Wind Energy'. Available at: <https://www.gov.scot/publications/sectoral-marine-plan-offshore-wind-energy> (Accessed 24/09/2024)

³ Marine Management Organisation (MMO) (2023) 'Marine Pollution Contingency Plan'. Available at: <https://www.gov.uk/government/publications/marine-pollution-contingency-plan> (Accessed 24/09/2024).

⁴ HM Government (2024) 'The United Kingdom National Contingency Plan for Responding to Marine Pollution Incidents'. Available at: <https://www.gov.uk/government/publications/national-contingency-planncp> (Accessed 24/09/2024)

⁵ Marine Directorate (2024) 'Offshore renewable energy – accidental deposit of an object at sea: form and guidance'. Available at: <https://www.gov.scot/publications/offshore-renewables-accidental-deposit-of-an-object-at-sea-form-and-guidance> (Accessed 01/10/2024)

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