Salamander Offshore Wind Farm

Offshore EIA Report

Volume ER.A.6, Plan P.2: Outline Operation Environmental Management Plan (OEMP)

SALAMANDER

Powered by Ørsted and Simply Blue Group

Document Title:	Outline Operation Environmental Management Plan
Document no:	08603215
Project:	Salamander Offshore Wind Farm
Revision	00
Originator	ERM
Date	April 2024

Revision History:

Revision	Date	Status	Originator	Reviewed	Approved
00	19/04/2024	Final	ERM	Salamander	Hugh Yendole

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Acronyms

Term	Definition
ALARP	As Low As Reasonably Practicable
CEMP	Construction Environmental Management Plan
EIAR	Environmental Impact Assessment Report
EPS	European Protected Species
FLO	Fisheries Liaison Officer (FLO)
HSE	Health and Safety Executive
INNS	Invasive Non-Native Species
MD-LOT	Marine Directorate Licencing Operations Team
MMMP	Marine Mammal Mitigation Plan
MPCP	Marine Pollution Contingency Plan
MW	Megawatt
OEMP	Operation Environmental Management Plan
PAD	Protocol for Archaeological Discoveries
SMWWC	Scottish Marine Wildlife Watching Code
SWPC	Salamander Wind Project Company (formerly called Simply Blue Energy (Scotland) Limited (SBES))
UXO	Unexploded Ordinance
VMP	Vessel Management Plan
WMP	Waste Management Plan
WSI	Written Scheme of Investigation

1 Introduction

1.1 Overview

1.1.1.1 This Outline Operation Environment Management Plan (OEMP) has been produced along with the Environmental Impact Assessment Report (EIAR) and aims to ensure general best practice measures are adhered to throughout operation and maintenance.

1.2 Project Background

1.2.1 Salamander Wind Project Company Limited (SWPC) ('the Developer'), a joint venture (JV) partnership between Ørsted, Simply Blue Group and Subsea7, is proposing the development of the Salamander Offshore Wind Farm (hereafter 'Salamander Project'). The Salamander Project will consist of the installation of a floating offshore wind farm (up to 100 megawatts (MW) capacity) approximately 35 kilometres (km) east of Peterhead. It will comprise of up to 7 wind turbine generators, associated foundations and moorings, sub-sea hubs and cabling. The export cabling will run from the Offshore Array Area to the Landfall where the marine cable will be jointed to the terrestrial cable.

1.2.2 The Salamander Project is applying for a Section 36 Consent and associated Marine Licences. The current schedule for the operation of the Salamander Project is expected to commence [TBC post consent].

1.3 Purpose of the Outline OEMP

1.3.1.1 This Outline OEMP will form the basis of the final OEMP. The final OEMP will be finalised and approved post-consent and approved as part of condition discharge prior to operations by Scottish Ministers in accordance with the Section 36 Consent and associated Marine Licenses. It sets out the framework and minimum arrangements for the environmental management of the operational phase of the Salamander Project Offshore Development, and has been produced to provide the framework to discharge the requirements of the relevant consent / license conditions. From this point onwards, 'OEMP' refers to the final, approved OEMP.

1.3.1.2 The broad objectives of the OEMP are as follows:

- To provide a mechanism to ensure that measures to mitigate potentially adverse environmental impacts are implemented during the operational phase;
- To promote and meet good practice standards throughout operation of the Salamander Project; and
- To provide a framework for compliance auditing and inspection to enable the Developer to be assured that the necessary levels of environmental performance are being met.

1.3.1.3 **Table 1-1** sets out those license conditions relevant to the OEMP discharge.

Table 1-1 Section 36 and Marine Licence Conditions of Relevance to the OEMP

License	Condition	Details	Relevant Section
[To be added post-consent]			

1.3.1.4 The legislative requirements, current standards and best practice measures which define the standards of operational and maintenance practice adhered to by the contractors shall be outlined within the OEMP. However, adhering to the final OEMP does not absolve the Developer, contractors, or subcontractors from complying with legislation and bylaws relevant to their operation and maintenance activities.

1.4 Approach to Amending and Updating this OEMP

1.4.1.1 Once approved, the OEMP sets out the proposed environmental management framework and procedures that will be followed by all contractors and subcontractors during the operation of the Salamander Project Offshore Development. Prior to the handover of the Salamander Project Offshore Development to the Operational Phase, the final OEMP will be reviewed and become active.

1.5 Implementation of the OEMP

1.5.1.1 The OEMP approved by Scottish Ministers will be integrated into the contracts for principal contractors responsible for offshore works. All principal contractors, subcontractors, and their suppliers must adhere to the pertinent provisions of the detailed OEMP. They are obligated to furnish evidence detailing how they will guarantee the implementation and monitoring of the OEMP's requirements and will develop their own EMPs tailored to their tasks, ensuring compliance with this Offshore OEMP. Prior to operation, Contractor EMPs will be submitted to the Developer for review and approval to ensure conformity with the Salamander Project Offshore OEMP.

1.6 Scope of OEMP

1.6.1.1 The OEMP will cover the following:

- Offshore personnel, roles and responsibilities and reporting structures in relation to environmental management, including for contractors and subcontractors; and
- The procedure for communicating and reporting any environmental compliance matters associated with the Operational Environmental Management Plan with the Marine Directorate – Licensing Operations Team (MD-LOT) and relevant stakeholders;

2 OEMP Content

2.1.1.1 This section outlines the content to be included within the OEMP.

2.2 Roles and Responsibilities

2.2.1.1 The roles and responsibilities of key personnel relevant to the OEMP are outlined in Table 2-1. More specific roles and responsibilities pertinent to key activities or aspects of this plan are detailed in the corresponding sections. Key contacts will be listed with **Appendix A: Contacts Database**.

Table 2-1 Roles and Responsibilities of the Salamander Offshore Wind (*indicative for outline OEMP*)

Role	Responsibilities
Head of Site	Management of the offshore operation and maintenance of the site
Operation and Maintenance Project Manager	Responsible for the technical delivery and coordination of operation and maintenance activities in relation to the offshore work and ensuring health and safety standards on site.
Project HSE Manager	Delivery of HSE elements including HSE performance and promoting safety leadership across the Project, encouraging an exemplary behavioural safety culture.
HSE Advisor	Responsible for ensuring that the project team adhere to relevant HSE policy and processes, manages the site HSE teams, accountable for the reporting and investigation of HSE incidents. Also responsible for HSE site inductions and compliance with training and medical requirements for personnel / Contractors.
HSE Duty Holder	Duty Manager, available 24/7 to provide 1st line emergency response support.
Marine Co-Ordinator	Responsible for managing and coordinating vessel activity
Warehouse Manager	Coordination of offshore loadouts
Consent Manager	Overall responsibility for ensuring the Project remains compliant with the key project consents, that the relevant consent Conditions are discharged prior to the commencement of operation and maintenance activities and that all Contractors are aware of and comply with the relevant consents. The Consent Manager is also responsible for liaising with the relevant licensing authorities.
Offshore Environmental Manager	Responsible for maintaining this OEMP and managing external resources relevant to this OEMP
Company Fisheries Liaison Officer	Responsible for the dissemination of relevant vessel movements and updates on operational activities to the interested fisheries parties.
Fisheries Industry Representative	Direct point of contact for the fishing industry and will support the FLO circulating information from the Salamander Project as required.

Client Representative	Represents the Client during offshore operations

2.2.2 Contractor Responsibilities

2.2.2.1 The OEMP shall set out relevant legislation applicable to vessels to be used in offshore operational works once identified.

2.2.2.2 The OEMP shall include a list of the relevant documentation and any licences or documentation provided by the operator. It is the Contractor's responsibility to ensure that they conduct their activities in accordance with those documents and license listed and relevant legislation.

2.2.3 Regulatory / Advisor Responsibilities

2.2.3.1 In the UK, there is a defined structure and procedure for responding to spill incidents which clearly defines the roles and responsibilities of Industry, UK Government (including environmental agencies), local Maritime Authorities, and MD-LOT as outlined in **Table 2-2**. In the case of the use of oil spill treatment products (i.e. dispersant) being requested, MD-LOT will grant approval following consultation with advisers on a range of topics.

Table 2-2 Regulatory Advisors and their Responsibilities

Role	Responsibilities
Marine Scotland Science	Advise on the likely impact of the pollution and potential responses.
NatureScot and JNCC	Advise on the presence of protected and sensitive species and habitats which could be impacted by pollution <12nm and >12nm respectively.
Local MD-LOT Principal Marine Officer	Provides advice on fisheries, shellfisheries, marine conservation zones, marine licensing and dispersant use, but not dispersant approval which is a Headquarters function.
MD-LOT Headquarters	Responsible for the authorisation and approval of oil spill treatment products (dispersants).
Marine and Coastguard Agency	Responsible for counter pollution control.

2.2.4 Training

2.2.4.1 Every offshore staff member engaged in the Salamander Project Offshore Development will undergo training on their duties related to environmental reporting, mitigating environmental risks and implementing the measures within the OEMP.

2.2.4.2 The principal contractors are obligated to guarantee that contractors engage a workforce possessing suitable qualifications and experience. They will also take on the responsibility of identifying the training requirements of their personnel, facilitating the provision of appropriate training. This training encompasses site inductions and briefings including toolbox talks designed to impart essential knowledge on health,

safety, and environmental matters. It shall also cover the relevant environmental control measures pertinent to the specific tasks scheduled for the day.

2.2.4.3 Contractors are required to offer comprehensive training to all personnel, including those from Sub-Contractors. The training should encompass the content of their respective Contractor's Environmental Management Plans, aligning with the Offshore OEMP and all consents and licenses for the Salamander Project Offshore Development.

2.2.4.4 Contractors will be responsible for keeping and furnishing training records to the Salamander Project.

2.3 Routine Reporting, Notifications and Communications to Stakeholders

2.3.1.1 This section addresses the Salamander Project Offshore Development's regular reporting, notification, and communication procedures with MD-LOT and other relevant stakeholders. These actions are mandated as part of the OEMP and are specified in the consent conditions.

2.3.1.2 **Table 2-3** describes the routine reporting obligations.

Table 2-3 Proposed Routine Salamander Project Reporting, Notification and Communications to Stakeholders

Activity	Summary of Requirement	Responsibility	Frequency
[To be added post-consent]			
e.g. Notice to Mariners			
Chemical usage reporting			

2.3.1.3 MD-LOT may also conduct periodic site inspections to monitor compliance with consents and approved Consent Plans. The Developer will facilitate access to all offshore operation and maintenance activities for this purpose, with appropriate prior notification.

2.4 Environmental Incidents and Non-Compliance Procedures

2.4.1.1 The Contractor bears the responsibility of identifying and recording all environmental risks related to their activities throughout the Salamander Project Offshore Development works. They must ensure the implementation of appropriate controls and procedures to prevent spillage, environmental incidents, and non-compliance with Salamander Project Offshore Development consents / licenses to the extent reasonably feasible, prior to commencing the works. Additionally, the Contractor is obligated to establish effective response and reporting processes in anticipation of any potential failure of preventive measures, to be activated in the event of spillage, environmental incidents, or non-compliance with the Salamander Project Offshore Development's consents / licenses.

2.4.1.2 The Contractor will develop a Marine Pollution Contingency Plan in accordance with the Salamander Project's own Marine Pollution Contingency Plan, detailed in Appendix B of **Volume ER.A.6, Plan P.1 Outline Construction Environmental Management Plan**.

2.4.1.3 The Developer will endeavour to comply with all relevant legislation and that the works are undertaken with appropriate licences and permissions in place. The Developer shall continually monitor and audit the

activities of Contractors and Sub-contractors and require that they too comply with all relevant legislation and any permit / licence conditions.

2.4.2 Recording and Documenting of Incidents

2.4.2.1 The Developer is committed to rapid and proportionate action and a proactive approach to learning in response to environmental incidents. To achieve this, prompt reporting of all environmental incidents is expected from all individuals and Contractors. This is in addition to any legal requirements or other recognised industry best practice.

2.4.2.2 Reporting requirements for spill incidents are detailed in Appendix B of **Volume ER.A.6, Plan P.1 Outline Construction Environmental Management Plan**.

2.4.2.3 In case of other non-compliances, the Contractor must forward an environmental incident report to the HSE Site Manager within 24 hours of becoming aware of non-compliance. The incident report must describe the non-compliance and a description of how to make sure that the incident does not happen again (Appendix B: Spill Response and **Dropped Objects Form**).

2.4.2.4 A '*force majeure*' occurs when authorised substances / articles are deposited outside of the Order Limits or unauthorised substances / articles are deposited within or outside the offshore Order Limits. If, due to stress of weather or any other cause, the master of a vessel can determine that it is necessary to deposit the substances or articles to ensure the safety of human life and / or the safety of the vessel. Full details of the circumstances shall be notified to the MD-LOT by the Installation Manager / Client Representative or Vessel Master within 48 hours of the incident occurring.

3 Management of Environmental Aspects and Compliance Obligations

3.1 Overview

3.1.1.1 This section categorises the primary environmental aspects associated with the operation and maintenance phase and subsequently outlines the comprehensive approach for managing related environmental impacts, as delineated in the Salamander Project Offshore Environmental Impact Assessment Report (EIAR).

3.1.1.2 Where impacts have been identified in the EIAR each Contractor must create a register of project environmental aspects and impacts to illustrate compliance with Salamander Project Offshore Development consents, licences, and Consent Plans, which will demonstrate relevant mitigation measures are applied.

3.1.1.3 Likewise, each Contractor must generate a register of project environmental compliance obligations to showcase that pertinent legal and other requirements have been identified and are being effectively managed within the scope of their work.

3.2 Marine Species

3.2.1.1 In the event of a wildlife incident occurring as a result of activity associated with the Salamander Project Offshore Development (e.g. injury to a marine mammal, or an observed fish or bird mortality), the incident will be reported to the relevant person as soon as possible who will then follow up with the relevant regulatory authority (details of the reporting procedure will be provided in the EMP post-consent).

3.2.1.2 The area around the Salamander Project Offshore Development may be visited regularly by marine species that are sensitive to noise disturbance. The Developer will ensure that all personnel adhere to the Scottish Marine Wildlife Watching Code (SMWWC), Vessel Management Plan and any appropriate European Protected Species (EPS) Licence conditions during the operational period of the Salamander Project. The following documents will be prepared post-consent to manage and mitigate the effects on marine animals:

- Marine Mammals Mitigation Plan (MMMP); and
- Vessel Management Plan (VMP);

3.3 Marine Archaeology

3.3.1.1 The procedures to be followed on discovering any marine archaeology during the operation and maintenance phases of the Salamander Project are set out in **Volume ER.A.6, Plan P.4: Written Scheme of Investigation (WSI) Protocol for Archaeology Discoveries (PAD).**

3.4 Fishing Activities

3.4.1.1 During the operation and maintenance stages of the Salamander Project a Fisheries Liaison Officer (FLO) will be in place who will be responsible for liaising with local fishermen with the aim of ensuring harmonious coexistence between the Salamander Project Offshore Development and commercial fishing interests in Aberdeenshire and Peterhead. Details are included within **Volume ER.A.6, Plan P.3 Fisheries Management and Mitigation Strategy**.

3.5 Marine Pollution Contingency Plan

3.5.1.1 The Marine Pollution Contingency Plan (MPCP) details the measures to be put in place to minimise any impacts due to the release of pollutants during the operation and maintenance phases of the Salamander

Project Offshore Development. These are set out in Appendix B of **Volume ER.A.6, Plan P.1 Outline Construction Environmental Management Plan (CEMP).**

3.6 Marine Invasive Non-Native Species

3.6.1.1 When implementing management measures to avert the introduction of invasive non-native species (INNS), the Salamander Project will:

- Through contractual conditions, work with all Contractors (and their Sub-Contractors) to adhere to the applicable and latest legislative requirements and guidelines in effect at the time of performing their tasks; and
- Through contractual conditions, will necessitate that Contractors (and their Sub-Contractors) develop EMPs delineating comprehensive procedures to preclude the introduction of INNS.

3.6.1.2 A Biosecurity Plan will be drafted post-consent which will highlight the required measures to prevent the introduction and/or spread of INNS as a result of the Salamander Project Offshore Development. The Developer will ensure appropriate biosecurity management practices are implemented during operation and maintenance phase of the project by adhering to relevant legislation and applying NatureScot's guidance 'Marine Biosecurity Planning Guidance for Producing Site and Operation-Based Plans for Preventing the Introduction of Non-Native Species'.

3.7 Waste Management Plan

3.7.1.1 A Waste Management Plan (WMP) will be produces which will comprehensively outline all waste management procedures related to their operation and maintenance activities, and provide specifics on anticipated waste generation, and propose the methods intended for waste management. Further details on the WMP will be included in the OEMP.

3.7.1.2 Contractors (and their sub-contractors) will be required to submit their Waste Management Plans to the Developer for approval before commencing any work.

3.8 Dropped Objects

3.8.1.1 The requirements regarding reporting of dropped objects will be described in greater detail in the OEMP prior to operation and maintenance works. For further information please refer to the MD-LOT Dropped object and spill reporting forms provided in **Appendix B: Spill Response and Dropped Objects Forms**.

3.9 UXO Management

3.9.1.1 Unexploded Ordnances (UXO) could cause substantial environmental impact if activated during offshore operations. UXO clearance activities would occur prior to construction to reduce the risk to ALARP. Should UXO be identified after clearance, the Developer will be notified immediately along with the relevant authorities. Should UXO need to be cleared during operation and maintenance MD-LOT will be notified and a separate Marine Licence and EPS Licence will be applied for.

Appendix A: Contacts Database

Role	Name	Telephone	E-mail
Salamander Contacts			
[To be added post-consent]			
External Stakeholder Contact Details			
[To be added post-consent]			

Appendix B: Spill Response and Dropped Objects Forms

CG77 POLREP Initial Incident Report Form

A. Classification: -	
B. Date/Time/Observer: -	
C. Position and Extent of Pollution: -	
D. Tide: - Wind: -	
E. Weather: -	
F. Characteristics of Pollution: -	
G. Source and Cause of Pollution: -	
H. Details of Vessels in area: -	
I. Not Used	
J. Any Photographs or Samples: -	
K. Remedial Action: -	
L. Forecast of oil movement: -	
M. Names of others informed: -	
N. Other relevant information: -	

Guidance is given below on the type of information to be recorded in a CG77 POLREP:

A. Classification: - Select – Doubtful, Probable, Confirmed

B. Date/Time/Observer: - Enter date/time of obs. – state UTC or local time / Enter name or title of observer

C. Position and Extent of Pollution: - by latitude and longitude, if possible, state range and bearing from some prominent landmark and estimated amount of pollution, e.g. size of polluted area; number of tonnes of spilled oil; or number of containers, drums etc. lost. When appropriate, give position of observer relative to pollution

D. Tide: - Speed/Direction Wind: - Speed/Direction

E. Weather: - Conditions and Sea State

F. Characteristics of Pollution: - give type of pollution, e.g. oil crude or otherwise; packaged or bulk chemicals; garbage. For chemicals, give proper name or United Nations Number, if known. For all, give appearance e.g. liquid; floating solid; liquid oil; semi-liquid sludge; tarry lumps; weathered oil; discoloration of sea; visible vapour etc.

G. Source and Cause of Pollution: - from vessels or other undertaking. If from a vessel, say whether as a result of apparent deliberate discharge or a casualty. If the latter, give a brief description. Where possible, give name, type,

size, nationality and Port of Registry of polluting vessel. If vessel is proceeding on its way, give course, speed and destination, if known.

H. Details of Vessels in area: - to be given if the polluter cannot be identified and the spill is considered to be of recent origin.

I. Not Used

J. Any Photographs or Samples: - Give details of any photographs or samples taken.

K. Remedial Action: - Give details of any actions taken, or intended, to deal with spillage.

L. Forecast: - Likely effects of pollution – e.g. arrival on shore and estimated timings.

M. Names: - of others informed apart from addressees to this message.

N. Other relevant information: - e.g. Names of other witnesses or references to other instances of pollution which may point to a source.

Reference Number:
Version: 01

DROPOB1 - OFFSHORE WIND & MARINE RENEWABLES DROPPED OBJECTS FORM

Marine Directorate notification pro-forma for reporting the dropped materials from the offshore wind/marine renewables industry at sea

This DROPOB1 form should be completed in conjunction with the 'Dropped Objects Policy Guidance'. This DROPOB1 must be submitted electronically to the organisations listed below no later than 24 hours after the event takes place (or as soon as possible where there is likely to be a significant hazard to other sea users). In circumstances where not all the information is available within 24 hours, the form should be submitted and can be updated at a later time.]

Marine Scotland	**MS.MarineRenewables@gov.scot**
Local HM Coastguard Station(s)	**[dependent on location of dropped object]**
Maritime & Coastguard Agency	navigationsafety@mcga.gov.uk
Kingfisher at Seafish	kingfisher@seafish.co.uk
Northern Lighthouse Board	Navigation@nlb.org.uk
UK Hydrographic Office (UKHO)	sdr@ukho.gov.uk
Navigational Warnings at UKHO	navwarnings@btconnect.com
Scottish Fisherman's Federation	PON2@sff.co.uk
Where geographically relevant:	
West Coast RIFG	Alastair.mcruaraidh.mcneill@gmail.com
Outer Hebrides RIFG	duncan@craigard.co.uk
Orkney Management Group	orkneyfisheries@btconnect.com
Shetland Shellfish Management Organisation	carole@ssmo.shetland.co.uk

Reporter details		Date of report:
Full name:	**Position/Title:**	
Contact telephone no:	**Contact e-mail:**	
Operator/Organisation/Company responsible for dropped object:		

Name licensee or vessel responsible for dropped object	
Location/position at the time of dropping object:	
Latitude:	**Longitude:**
Date dropped:	**Time (24hours):**
Weather conditions at time:	**Depth of sea (metres):**
Wind direction (0-360 degree):	**Wind speed (knots):**
Beaufort scale: **Tide rate/direction:**	**Wave height (metres):**

Reference Number:
Version: 01

Dropped object(s) – provide full description. Materials involved, function of object, dimensions etc. Provide photos if available.	Dropped objects:
If the materials are resting on the seabed are they near offshore assets? **If yes please provide details:**	
Are the materials likely to float on sea surface or in water column? **If no, estimated clearance over object:**	
If the answer to question above is yes - are materials likely to reach shore or cross an international border? - please specify	
Reasons for dropping object(s)	
What are the plans to recover the materials? Please specify details, including anticipated timescales for the recovery operation. If there are no plans to recover the materials the reason for this must be clearly specified.	
What are considered to be the risks and dangers to other users of the sea as a result of the lost or dumped materials not being recovered?	
Any further information that may be useful:	
In addition to those mandatory stated at the top of this form, please list the organisations that you have / will copy this form to:	

Reference Number:
Version: 01

For internal Marine Directorate use only:	
Incident history:	
Date of notification:	
Actions taken:	
Final action:	
Confirmation that case is closed : ☐	
Name of person closing the dropped objects case:	
Date closed:	
Reason for closing case:	
MS – Compliance/Fisheries/Renewables	
SFF	
NFFO	
IFGs	
MCA	
Kingfisher	
NLB	
UKHO	