



## **APPENDIX 5-3**

### **MARINE POLLUTION CONTINGENCY PLAN**

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## GLOSSARY

## ACRONYMS AND ABBREVIATIONS

## 2. GLOSSARY

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## GLOSSARY

Term	Definition
Sceirde Rocks Offshore Wind Farm ('The Project')	<p>Sceirde Rocks Offshore Wind Farm (The Project) is comprised of an Offshore Site and an Onshore Site. The transition between the Offshore and Onshore Sites (referred to as the Landfall) is the location at which the offshore export cable and communication cables emerge from the trenchless landfall duct and enter the Transition Joint Bay (TJB). The Offshore Site refers to the Offshore Array Area (OAA) and Offshore Export Cable Corridor (OECC) and the infrastructure within the OAA and the OECC.</p> <p>The OAA infrastructure will include 30 wind turbine generators (WTG), an offshore substation (OSS), 31 Gravity Base Structure (GBS) foundations which support the WTGs and OSS, and Inter-array Cables (IACs) and cable protection. The OECC infrastructure will include Offshore Export Cable (OEC) and cable protection</p>
The Applicant	In reference to planning – Fuinneamh Sceirde Teoranta (FST)
Offshore Export Cable Corridor	The Offshore Export Cable Corridor (OECC) is approximately 62 km in length, approximately 1 km wide along the majority of its length and has a total area of approximately 73 km <sup>2</sup> .
Landfall	The transition between the Offshore and Onshore Developments (referred to as the Landfall) is the location at which the offshore export cable and communication cables emerge from the trenchless landfall duct.
Environmental Impact Assessment (EIA)	EIA is a process used to evaluate the potential environmental effects of a proposed project ensures that environmental considerations are integrated into the planning and decision-making stages, helping to minimize negative impacts on the environment and promote sustainable development

## ACRONYMS AND ABBREVIATIONS

Acronym	Definition
AMP	Archaeological Management Plan
BWM	Ballast Water Management
COLREG	International Regulations for the Prevention of Collision at Sea
ECoW	Environmental Clerk of Works
EIAR	Environmental Impact Assessment Report
ERCoP	Emergency Response Co-operation Plan
FMMS	Fisheries Management and Mitigation Strategy
FST	Fuinneamh Sceirde Teoranta
GBS	Gravity Base Structure
HAT	Highest Astronomical Tide
HDD	Horizontal Direct Drilling
HMR	Helicopter Main Route
HNS	Hazardous Noxious Substance
IAA	Irish Aviation Authority
IAC	Inter-array Cable
LMP	Lighting and Marking Plan
MARPOL	International Convention for the Prevention of Pollution from Ships
MINNSMP	Marine Invasive Non-Native Species Management Plan
MMMP	Marine Mammal Mitigation Protocol

Acronym	Definition
MPCP	Marine Pollution Contingency Plan
NM	Nautical Mile
NIS	Natura Impact Statement
OAA	Offshore Array Area
OEC	Offshore Export Cable
OECC	Offshore Export Cable Corridor
OEMP	Offshore Environmental Management Plan
OSS	Offshore Substation
PAD	Protocol for Archaeological Discoveries
RWMP	Resource Waste Management Plan
SOLAS	International Regulations for the Safety of Life at Sea
SOPEP	Shipboard Oil Pollution Emergency Plans
TJB	Transition Joint Bay
UXO	Unexploded Ordnance
VMP	Vessel Management Plan
WMP	Waste Management Plan
WSI	Written Scheme of Investigation
WTG	Wind Turbine Generator

## 1. INTRODUCTION

### 1.1 Background

This Marine Pollution Contingency Plan (MPCP) forms part of the Offshore Environmental Management Plan (OEMP) and has been prepared by Xodus on behalf of Fuinneamh Sceirde Teoranta (FST) (hereafter referred to as the Applicant), for the construction, operation and decommissioning of the Sceirde Rocks Offshore Wind Farm, and all its offshore component parts within the Offshore Site. The Offshore Site refers to the Offshore Array Area (OAA) and Offshore Export Cable Corridor (OECC) and the infrastructure within the OAA and the OECC.

The MPCP has been prepared in conjunction with the Environmental Impact Assessment Report (EIAR) and the Natura Impact Statement (NIS) which will accompany the planning application for the Project to be submitted to An Bord Pleanála.

Should the Sceirde Rocks Offshore Wind Farm secure development permission, the MPCP will be updated, in line with all conditions and obligations which apply to any grant of permission. The MPCP should be read in conjunction with the EIAR and the planning drawings. The MPCP will also require updating by the appointed contractor in order to identify, assess and satisfy the contract performance criteria as set out by the various stakeholders. The MPCP, due to its structure and nature, will require constant updating and revision throughout the various phases of the project from construction to operation and decommissioning.

The appointed contractor will be required to implement all of the requirements set out in this MPCP. The MPCP may be updated and revised throughout the construction, operation and decommissioning phases, but all future iterations must meet or exceed the standards and requirements set out in this document and the Applicant must be satisfied that all requirements set out in this document can and will be implemented in full by the appointed contractor.

### 1.2 Project Description

Sceirde Rocks Offshore Wind Farm is comprised of an Offshore Site and an Onshore Site. The transition between the Offshore and Onshore Sites (referred to as the Landfall) is the location at which the offshore export cable (OEC) and communication cables emerge from the trenchless landfall duct and enter the TJB. This MPCP only considers the Offshore Site.

Sceirde Rocks Offshore Wind Farm EIAR, Chapter 5: Project Description describes the design details of the Offshore Site and all its component parts, situated off the West coast of Ireland.

The Offshore Site refers to the Offshore Array Area (OAA) and Offshore Export Cable Corridor (OECC) and the infrastructure within the OAA and the OECC.

The OAA infrastructure will include 30 wind turbine generators (WTG), an offshore substation (OSS), 31 gravity base structure (GBS) foundations which support the WTGs and OSS, and inter-array cables (IACs) and cable protection. The OECC infrastructure will include offshore export cable (OEC) and cable protection.

Figure 1-1 shows the layout of the Offshore Site.

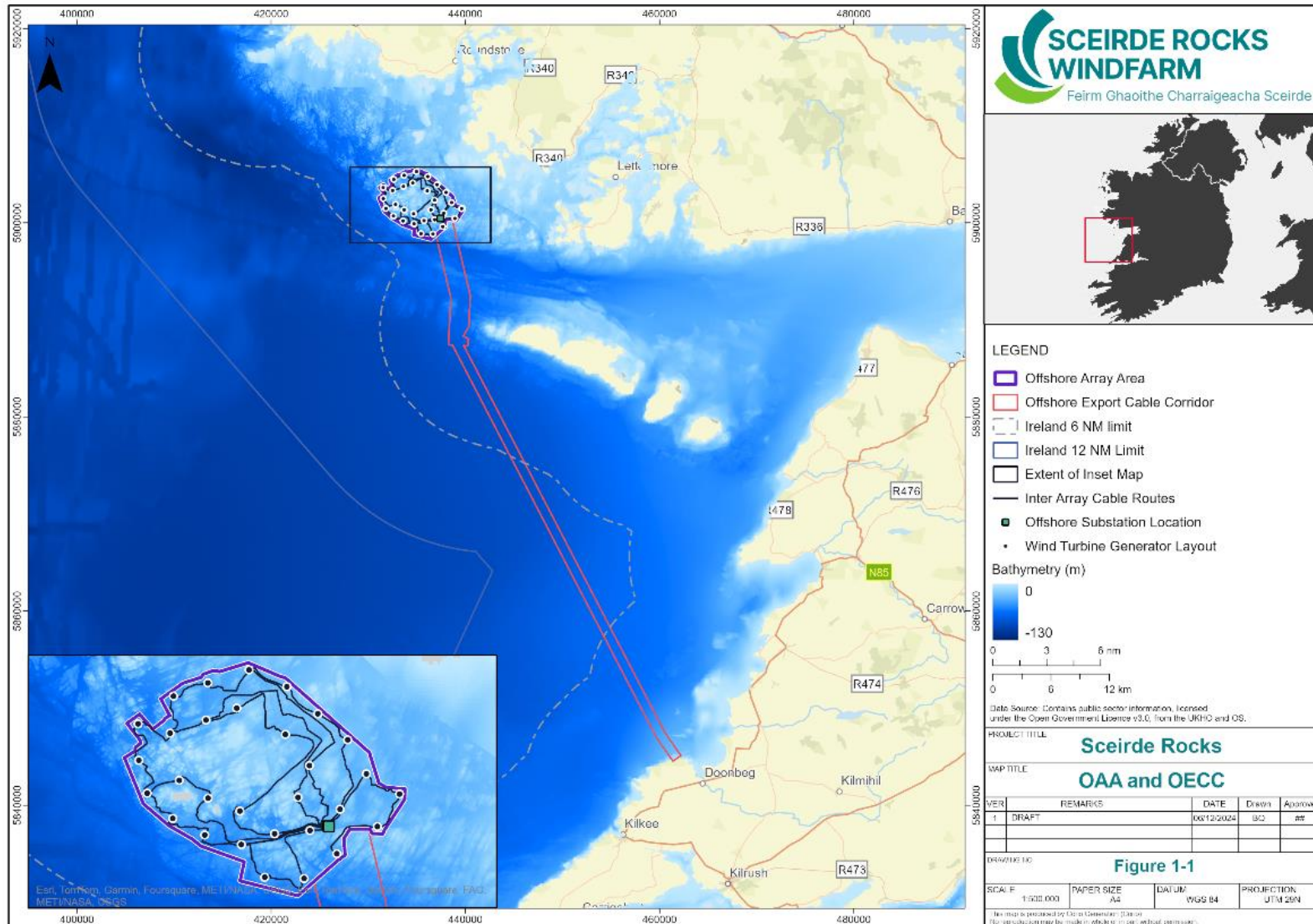


Figure 1-1 Sceirde Rocks Offshore Wind Farm Offshore Site



## 1.3 Purpose of Document

The purpose of the MPCP is to set out the approach to management and mitigation in respect of the Offshore Site by providing an outline of a response plan to marine pollution incidents, such as oil spills or hazardous substance releases associated with the Sceirde Rocks Offshore Wind Farm.

This MPCP provides a mechanism to coordinate safety procedures that should be followed to protect personnel that are involved in the activities associated with the Offshore Site, as well as the marine environment, following a marine pollution incident, such as oil spills or hazardous substance releases that may arise during construction, operation and maintenance, and decommissioning activities.

This MPCP implemented the following to develop a response to marine pollution incident resulting from construction, operation and decommissioning activities associated with the Offshore Site.

- A tiered risk assessment of potential oil sources and the probability of an accidental release of pollutant as a result of an event; and
- Response procedures to follow in the event of a marine pollution incident.
- The information presented in this document will be reviewed and consulted by the Irish Coast Guard (IRCG). All personnel involved in activities associated with the Offshore Site, including the Applicants team and contractors/ subcontractors must adhere with the MPCP.

The MPCP will be further updated to support the construction programme.

## 1.4 Construction Programme

The construction programme associated with the Offshore Site is detailed in Table 1-1.

*Table 1-1 Offshore Site activities from pre-installation to commissioning*

Activity	Description
Pre-construction surveys and site investigations	Additional pre-construction surveys may be undertaken, including geophysical, geotechnical, benthic, Unexploded Ordnance (UXO) and metocean investigations. Other surveys, e.g. for birds, may also be undertaken as required.
Site preparation	Seabed preparations will be required prior to the installation of GBS foundations and offshore cable infrastructure. This may include dredging, boulder clearance and UXO clearance. Site preparation works also include the placement of rock to form a stonebed for GBS foundations and for WTIV operations.
GBS foundation and sub-structure installation	Prior to installation at the OAA, the GBS foundations are proposed to be temporarily anchored, at a temporary anchor facility which is subject to a separate application and assessment process. Foundations will be towed to site and installed ahead of the WTG and OSS topside structure.
OSS installation/commissioning	OSS topside structure is installed after the installation of the GBS foundation. Following installation of the OSS and connection to the inter-array and export cabling, a process of testing and commissioning will be undertaken.

Activity	Description
OEC – landfall and offshore installation	<p>Following the completion of the necessary onshore works (including the necessary landfall preparations) and the offshore site preparations, the OEC will be laid from the landfall out to the OSS, with the potential for pre-trenching works to be undertaken ahead of cable installation.</p> <p>The export cable will be buried wherever possible and may be installed using a variety of techniques detailed further in section 5.6.1. Following cable lay and burial (which may occur simultaneously or sequentially) external cable protection will be installed, as necessary. Further details on cable protection are provided in the chapter ‘Project Description’ of the EIAR.</p>
Inter-array cable installation	<p>The inter-array cables will be installed between the WTGs and between WTGs and the OSS.</p> <p>The installation techniques for the inter-array cables will be similar to that of the OEC.</p>
WTG installation/commissioning	<p>The WTGs will be fabricated onshore and transported to the OAA for installation. Following installation of the WTG and connection to the inter-array cabling, a process of testing and commissioning will be undertaken.</p>

## 1.5

# OEMP and Management Plans

The MPCP is an appendix to the overarching Project Offshore Environmental Management Plan (OEMP).

Table 1-2 below sets out the other appendices that feed into the OEMP.

*Table 1-2 Other appendices of the OEMP*

Consents Management Plan	Justification
Resource Waste Management Plan (RWMP)	<p>The RWMP sets out the provisions for waste management for Offshore Site components in line with the waste management hierarchy.</p> <p>The RWMP will be included as an appendix to the Offshore Environmental Management Plan (OEMP).</p>
Vessel Management Plan (VMP)	<p>The VMP sets out how all vessels associated with the Offshore Site will comply with the provisions of the International Regulations for the Prevention of Collision at Sea (COLREGs) and the International Regulations for the Safety of Life at Sea (SOLAS).</p> <p>The VMP will be included as an appendix to the Offshore Environmental Management Plan (OEMP).</p>

Consents Management Plan	Justification
Fisheries Management and Mitigation Strategy (FMMS)	<p>The FMMS sets out the activities designed to manage and mitigate the impacts of various projects on local fisheries.</p> <p>The FMMS will be included as an appendix to the Offshore Environmental Management Plan (OEMP).</p>
Marine Mammal Mitigation Protocol (MMMP)	<p>The MMMP sets out the mitigation measures to avoid injury and disturbance to marine mammals will be developed. This will be developed with full regard to the NPWS (2014) Guidelines and industry good practice from other jurisdictions and could include the use of acoustic deterrent devices to temporarily displace animals away from the highest risk (injury) zones, and marine mammal visual and acoustic observers to ensure that there are no marine mammals in close proximity (1,000 metres) of the UXO being cleared.</p> <p>The MMMP will be included as an appendix to the Offshore Environmental Management Plan (OEMP).</p>
Emergency Response Co-operation Plan (ERCoP)	<p>The ERCoP sets out the actions to be taken during an emergency, the resources available to support those actions, and emergency contact details.</p> <p>The ERCoP will be included as Appendix 5-4.</p>
Marine Invasive Non-Native Species Management Plan (MINNSMP)	<p>The MINNSMP sets out the approach to invasive species management and mitigation in respect of the Offshore Site providing an outline of the proposed measures to be implemented to facilitate biosecurity control and to minimise potential impacts on the local and wider offshore environment.</p> <p>The MINNSMP will be included as an appendix to the Offshore Environmental Management Plan (OEMP).</p>
Lighting and Marking Plan (LMP)	<p>The LMP sets out the marine lighting and marking requirements and procedures for the Offshore Site during the construction and operation stages.</p> <p>The LMP will be included as an appendix to the Offshore Environmental Management Plan (OEMP).</p>
Archaeological Management Plan	<p>The AMP sets out the procedures to be followed on discovering any marine archaeological assets during the construction and operation stages of the Project.</p>

Consents Management Plan	Justification
	The AMP will be included as an appendix to the Offshore Environmental Management Plan (OEMP).

1.6

## Summary of Measures, Mitigation and Monitoring Included in the EIAR

The embedded mitigation and monitoring measures detailed within the EIAR and relevant to this MPCP are presented in Table 1-3.

*Table 1-3 Relevant embedded mitigation and monitoring measures detailed in the EIAR*

Measures	Justification
Pollution planning	An MPCP will be developed outlining procedures to protect personnel working and safeguard the environment should a pollution event occur.
Marine Pollution Contingency Plan (MPCP)	An MPCP will be created for the Offshore Site with consideration of the National Maritime Oil/Hazardous Noxious Substance (HNS) Spill Contingency Plan.
Adherence to conventions for pollution prevention and ballast water management	Adherence to the International Convention for the Prevention of Pollution from Ships (MARPOL) and Ballast Water Management (BWM) Conventions, including Shipboard Oil Pollution Emergency Plans (SOPEP).
Implementation of a Construction Environment Management Plan (CEMP)	A CEMP will be developed, which will include measures for pollution prevention, biosecurity assessment and waste management.

## 2. ROLES AND RESPONSIBILITIES

### 2.1 The Applicant

The Applicant, Fuinneamh Sceirde Teoranta (FST) is fully responsible for any marine pollution incident including oil or chemical spill that may occur as a result of construction, operation and decommissioning activities associated with the Offshore Site and will be financially accountable for the clean-up.

#### 2.1.1 Project Manager

The Applicant shall appoint a Project Manager (PM) at each development phase of the Offshore Site, the PM is responsible for ensuring that the procedure detailed within this MPCP is implemented and adhered to correctly. The main duties of the PM include:

- Updating the MPCP;
- Developing and maintaining the Contractor's MPCP, which will incorporate appropriate procedures during a response to pollution prevention and accidental spillages
- Ensuring contractors adhere to the Project's MPCP;
- Communicating with statutory bodies (such as the Irish Coast Guard (IRCG) and other local authorities impacted by a spill; and
- Ensuring there are appropriate resources and processes to be compliant with the Project's MPCP.
- 

The PM will ensure the MPCP is revised for the construction phase and updated accordingly prior to the operation phase.

If required, the Environmental Manager may also support the PM to ensure that essential tasks relating to the MPCP are carried out.

The Applicant is also responsible for reviewing the MPCP during the construction phase and updating the document with any new information. Should there be a marine pollution incident, the Applicant must hold an internal meeting to discuss the marine pollution incident and review lessons learned from the event within the Project's MPCP and the Contractor's MPCP.

#### 2.1.2 Marine Coordinator

The Applicant shall appoint a Marine Coordinator for the Offshore Site prior to the commencement of construction activities. Expected duties for the Marine Coordinator will include coordinating vessel activity and will act as the main point of contact should there be a marine pollution incident.

In the event of a marine pollution incident associated with a vessel associated with the Offshore Site, it will be the duty of the Marine Coordinator to assist with implementing the response plan, whilst ensuring clear communication with the Applicant (including the Project Manager and Environmental Manager) and other relevant personnel, such as subcontractors/ contractors. The Marine Coordinator will supervise the clean-up procedures and ensure correct marine pollution incident response is followed.

## 2.2

## Contractor and Subcontractors

Contractors will predominantly be responsible for the offshore activities that are conducted throughout the construction, operation and decommissioning phases of the Offshore Site. It is the Applicant's responsibility to ensure that all relevant personnel, contractors or subcontractors, understand the MPCP. Additionally, the Applicant requires that contractors and subcontractors identified by the PM develop their own Contractor MPCP before commencing any onsite activities. This Contractor MPCP must be submitted to and reviewed by the Applicant for approval and will be reviewed every six months. The Applicant must approve any updates to the Contractor MPCP before being implemented at the Offshore Site.

The Contractor MPCP which applies within the Offshore Site boundary, will include the contractors own marine pollution incident response arrangements and must align and comply with the Applicant's MPCP. All contractors and subcontractors must be familiar with both the Applicant's MPCP and the Contractor's MPCP and each develop their own pollution prevention and contingency plans for the Applicant's approval, ensuring compliance with the Applicant's MPCP guidelines.

Contractors are responsible for ensuring that appropriate pollution prevention and response training to relevant personnel, and that appropriate equipment is available on all vessels working at the Offshore Site. Relevant personnel must ensure that each vessel under their management has a Ship-board Oil Pollution Contingency Plan (SOPEP) (MARPOL 73/78 Annex I, reg. 26) or an equivalent spill plan for spills involving Offshore Site vessels, activities, and operations.

Contractors/subcontractors are responsible to liaise with the Marine Coordinator in the event of a marine pollution incident to ensure the correct procedures are followed.

## 2.3

## Oil Spill Response Contractor

All contractor/ subcontractors are required to appoint an Oil Spill Response Contractor before any offshore works begin at the offshore Site. The Oil Spill Response Contractor will be responsible for carrying out response procedures adequately and understand the scope of works associated with the Offshore Site's activities. An Oil Spill Response Contractor is required for the construction, operation and decommissioning phases of the Offshore Site.

### 3. **POTENTIAL SPILL SOURCES AND CONTROL MEASURES**

#### 3.1 **Potential Spill Sources**

The Contractor's MPCP will include a pollutant inventory that will be used as a foundation for a risk assessment in the event of a marine pollution incident. The inventory will be used during the construction, operation, and decommissioning phases of the Offshore Site. The inventory list should detail volumes, types, and sources of pollutants, specifically, any hydrocarbons that may be used, including oils and lubricants, and will prompt the development of strategies and spill response procedures. This should also be used alongside relevant preventative measures.

The Marine Coordinator will develop and maintain a vessel register of all vessels used during construction operation, and decommissioning phases, which will detail the hydrocarbons (e.g. lubrication and hydraulic oils) on board Offshore Site vessels.

The activities conducted during the construction operation and decommissioning phases of the Offshore Site will be carried out carefully following embedded mitigations, as detailed in

Table 1-3 to minimise the risk of spillages into the marine environment. Each vessel will have chemical inventories to manage potential risk and control measures will be identified, such as:

- Regular meetings involving all relevant personnel to discuss the programme; and
- Ensuring all personnel are aware of the potential hazards, risks, and understand the appropriate control measures.

#### 3.2 **Pollution Sources and Risk Assessment**

##### 3.2.1 **Tier Classification**

In the event of a marine pollution incident, such as an oil spill, the procedure that will be followed depends on several factors:

- The attributes and quantity of the spilled pollutant;
- The characteristics of the pollutant once in the marine environment;
- The environmental sensitivities in the vicinity of the spill; and
- The outcomes of each oil spill response options on the environment.

The overall severity of a spill is influenced by the quantity of the pollutant spilled, the intricacy of the response measure, and the potential outcome. Tiers are used to categorise marine pollution incidents and are as follows (IRCG, 2020a):

- Tier 1: Spills occur and are responded to immediately, usually resolved by personnel onsite, local authority, harbour authority or operator of offshore unit or oil/ hazardous and noxious substances (HNS) handling facility;
- Tier 2: The size of the spill is beyond the capability of an authority or operator acting alone. The response is led by a harbour or local authority, depending on the extent of the pollution. This may involve support from other marine and/ or coastal operations; and

- Tier 3: Spills are typically more complex, of longer duration and higher impact, and beyond the response capability of the affected or threatened local authorities, harbour authority or facility operator (in such events as an extremely large oil spill, or oil well blow-out). The response requires nationally led operations and may involve a range of government departments. Coordination and oversight are by the IRCG, who may require support from national resources and international authorities. The National Contingency Plan (NCP) provides the framework for all Tiers but focuses on contingencies for Tier 3 (IRCG, 2020a).

The NCP does not establish strict criteria for initiating a national (Tier 3) response. It is up to the Ship Casualty and Pollution Manager (or an authorized officer in their absence) to evaluate the situation and take appropriate action. However, as a guideline, a Tier 3 incident may be initiated if:

- A shipping casualty gives rise to the risk of significant pollution requiring a salvage operation;
- A ship-source spill of oil or HNS at sea requires the deployment of sea borne or air-borne equipment to contain, disperse or neutralise it; and
- A spill of oil or HNS within the area of a harbour authority requires the deployment of national resources under national control to contain, disperse or neutralise it, or other action beyond the capacity of the harbour authority and local authority concerned; or
- A local authority requests the deployment of national shoreline equipment under national control because the action is beyond the capacity of the local authority after allowing for any mutual support arrangements with neighbouring authorities.

If a national (Tier 3) response is deemed unnecessary, the IRCG may still provide support by deploying resources from the national stockpile to assist with Tier 2 responders.

The Tier level outcome of a spill cannot be predicted accurately, however, in a worst-case scenario, it is possible, but unlikely, that a Tier 2 or Tier 3 response may be necessary. Table 3-1 details that smaller oil spills that may occur as a result of operational works are most likely, although it cannot be ruled out that the severity of the spill may increase to a Tier 2 or Tier 3 incident.

Hydrocarbons are most likely to be used as fuel for Offshore Site vessels and their quantities held on the vessels will be limited due to the capacity of the vessel's bunkering container. The precautionary worst-case scenario would be vessel collision with another vessel, or a vessel collision with a structure, such as a wind turbine, which would result in a complete loss of fuel supply. The nature and impact of a marine pollution incident/ oil spill in the marine environment will be dependent upon the oil type, volume, and location of spill; some pollutants may disperse quickly and others may take longer, as described in Section 3.3.

### 3.2.2 Potential Spill Scenarios and Control Measures

Table 4.1 presents the risk assessment for different spill scenarios that may arise as a result of Offshore Site activities and associated control measures to reduce or completely remove the potential marine pollution risk. Table 3-1 will be reviewed prior to any construction works and, if necessary, refined further and amended.

The risk assessment will also be subject to review ahead of the construction phase.

### 3.2.3 Dropped Objects

All dropped objects will be recorded and reported to the competent authority using a Dropped Object



Procedure Form. The format of the Dropped Object Procedure Form is to be agreed prior to commencement of construction activities.

Table 3-1 Risk assessment of potential spill scenarios and control measures

Potential pollutant	Activity	Spill scenario	Control measures	Likelihood with control measures	Likely tier
Hydrocarbons	Refuelling vessels	Potential for spillage during vessel to vessel refuelling either within or out of the Offshore Site.	<p>Where possible, vessel refuelling (bunkering) will take place at appropriate port locations, following the established practices of those ports. Should a scenario arise where refuelling (bunkering) of vessels is required within the Offshore site, this will be undertaken in accordance with the MPCP. Therefore, the development of risk assessments for individual tasks, method statements and fuel transfer planning equipment will be required.</p> <p>Precautionary measures will be taken. Vessel to vessel refuelling will occur during daylight hours, in favourable weather conditions, and with advance planning.</p> <p>Refuelling will be overseen by relevant personnel, such as a Chief Engineer, and will be in line with the vessel-specific refuelling procedures and checklists.</p> <p>The vessel will have a bunker plan, which can be easily located.</p> <p>Prior to vessel refuelling, a meeting will be held with all personnel onboard the vessels to discuss the following operation, and will include, but will not be limited to:</p> <ul style="list-style-type: none"> <li>&gt; Bunker plan;</li> <li>&gt; Risk assessment;</li> <li>&gt; Roles and responsibilities of the vessel crew;</li> <li>&gt; Emergency procedures; and</li> <li>&gt; Bunkering checklist.</li> </ul>	Low	Tier 2

			<p>Personnel carrying out the refuelling operations need to ensure that hoses are used that have non-return valves and follow all relevant permits, guidance, and legislation.</p> <p>Appropriate training must be provided to crew members and personnel supervising the operations, including training in spill prevention awareness, procedures in the event of a spill, and the use of spill kits.</p> <p>Regular checks and maintenance are required for all equipment used, and spill kits must be on board and available to use for any minor spillages.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p> <p>All pipes and fittings should be regularly checked to detect any signs of leaks and addressed immediately.</p>		
	Refuelling equipment	Potential for spillage during equipment refuelling either within or out of the Offshore Site.	As above.	Low	Tier 1
	Vessel collision	Potential for fuel spillage from a vessel-to-vessel collision.	<p>All Project vessels will comply with specific vessel requirements to avoid collisions, which include:</p> <ul style="list-style-type: none"> <li>➤ Advisory safe passing distances may be deployed around ongoing work being undertaken by a Project vessel;</li> </ul>	Very low	Tier 2

			<ul style="list-style-type: none"> <li>➤ All project vessels will comply with international marine regulations as adopted by the Flag State including the COLREGs (IMO, 1972/77) and SOLAS (IMO, 1974);</li> <li>➤ Marine coordination will be implemented to manage project vessel movements;</li> <li>➤ Information for vessel routes, timings and locations, advisory safe passing distances will be circulated principally via Notices to Mariners; and</li> <li>➤ Adherence to the Lighting and Marking Plan (LMP).</li> </ul>		
	Vessel collision	Potential for fuel spillage from a vessel to structure collision (e.g. wind turbine).	As above.	Very low	Tier 2
	Vessel stranding/ grounding	Potential for fuel spillage to occur if the vessel impacts on the seabed.	All Project vessels must comply with navigational requirements, which will be developed prior to any offshore works.	Very low	Tier 2
	Equipment failure	Potential for fuel spillage to occur during equipment failure.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Only trained personnel will operate equipment.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p> <p>All pipes and fittings should be regularly checked to detect any signs of leaks and addressed immediately.</p>	Low	Tier 1

	Operation of equipment	Potential for small fuel spillage to occur during equipment operation.	<p>The development of risk assessments for individual tasks, method statement will be required.</p> <p>Appropriate training must be provided to crew members and personnel supervising the operations, including training in spill prevention awareness, procedures in the event of a spill, and the use of spill kits.</p> <p>Regular checks and maintenance are required for all equipment used, and spill kits must be on board and available to use for any minor spillages.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p> <p>All pipes and fittings should be regularly checked to detect any signs of leaks and addressed immediately.</p>	Low	Tier 1
Lubricating oil	Vessel impact	Potential for lubricating oil spillage to occur during vessel collision, and/ or stranding/ grounding.	<p>All Project vessels will comply with specific vessel requirement to avoid collisions, which include:</p> <ul style="list-style-type: none"> <li>➤ Advisory safe passing distances may be deployed around ongoing work being undertaken by a Project vessel;</li> <li>➤ All project vessels will comply with international marine regulations as adopted by the Flag State including the COLREGs (IMO, 1972/77) and SOLAS (IMO, 1974);</li> <li>➤ Marine coordination will be implemented to manage project vessel movements;</li> </ul>	Very low	Tier 2

			<ul style="list-style-type: none"> <li>&gt; Information for vessel routes, timings and locations, advisory safe passing distances will be circulated principally via Notices to Mariners; and</li> <li>&gt; Adherence to the LMP.</li> </ul>		
	Leakage	Potential for lubrication oil to leak from wind turbines.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Turbine sensors will be fitted and will alert when there has been an oil leak.</p> <p>The nacelle will contain a bunded area that will collect leaking oil.</p> <p>Oil seals will be regularly inspected and maintained as required.</p>	Low	Tier 1
	Leakage	Potential for lubrication oil to leak from offshore substation transformers.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Environmental mitigation measures will be followed and offshore substation transformers will contain a bunded area that will collect leaking oil.</p> <p>Oil seals will be regularly inspected and maintained as required.</p>	Low	Tier 1
	Operation of equipment	Potential for small oil spillage to occur during equipment operation.	<p>The development of risk assessments for individual tasks and method statements will be required.</p> <p>Appropriate training must be provided to crew members and personnel supervising the operations, including training in spill prevention awareness, procedures in the event of a spill, and the use of spill kits.</p>	Low	Tier 1

			<p>Regular checks and maintenance are required for all equipment used, and spill kits must be on board and available to use for any minor spillages.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p> <p>All pipes and fittings should be regularly checked to detect any signs of leaks and addressed immediately.</p>		
	Equipment failure	Potential for oil spillage to occur during equipment failure.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Only trained personnel will operate equipment.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p>	Low	Tier 1
Hydraulic oil	Vessel impact	Potential for hydraulic oil spillage to occur during vessel collision, and/ or stranding/ grounding.	<p>All Project vessels will comply with specific vessel requirement to avoid collisions, which include:</p> <ul style="list-style-type: none"> <li>➤ Advisory safe passing distances may be deployed around ongoing work being undertaken by a Project vessel;</li> <li>➤ All project vessels will comply with international marine regulations as adopted by the Flag State including the COLREGs (IMO, 1972/77) and SOLAS (IMO, 1974);</li> <li>➤ Marine coordination will be implemented to manage project vessel movements;</li> </ul>	Very low	Tier 1

			<ul style="list-style-type: none"> <li>Information for vessel routes, timings and locations, advisory safe passing distances will be circulated principally via Notices to Mariners; and</li> <li>Adherence to the LMP.</li> </ul>		
	Leakage	Potential for hydraulic oil to leak from wind turbines.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Turbine sensors will be fitted and will alert when there has been an oil leak.</p> <p>The nacelle will contain a bunded area that will collect leaking oil.</p> <p>Oil seals will be regularly inspected and maintained as required.</p>	Low	Tier 1
	Equipment failure	Potential for hydraulic spillage to occur during equipment failure.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Only trained personnel will operate equipment.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p>	Low	Tier 1
	Operation of equipment	Potential for small hydraulic oil spillage to occur during equipment operation.	<p>The development of risk assessments for individual tasks, method statement will be required.</p> <p>Appropriate training must be provided to crew members and personnel supervising the operations, including training in spill prevention awareness, procedures in the event of a spill, and the use of spill kits.</p>	Low	Tier 1



			<p>Regular checks and maintenance are required for all equipment used, and spill kits must be on board and available to use for any minor spillages.</p> <p>Any equipment, which may result in oil leakages, such as trays beneath oil pumps, must be regularly checked and drained when required.</p> <p>All pipes and fittings should be regularly checked to detect any signs of leaks and addressed immediately.</p>		
Chemicals	Vessel impact	Potential for hydraulic oil spillage to occur during vessel collision, and/ or stranding/ grounding.	<p>All Project vessels will comply with specific vessel requirement to avoid collisions, which include:</p> <ul style="list-style-type: none"> <li>➤ Advisory safe passing distances may be deployed around ongoing work being undertaken by a Project vessel;</li> <li>➤ All project vessels will comply with international marine regulations as adopted by the Flag State including the COLREGs (IMO, 1972/77) and SOLAS (IMO, 1974);</li> <li>➤ Marine coordination will be implemented to manage project vessel movements;</li> <li>➤ Information for vessel routes, timings and locations, advisory safe passing distances will be circulated principally via Notices to Mariners; and</li> <li>➤ Adherence to the LMP.</li> </ul>	Very low	Tier 1
	Leakage	Potential for hydraulic oil to leak from wind turbines.	<p>All equipment will be regularly inspected and maintained to ensure legal requirements are met.</p> <p>Turbine sensors will be fitted and will alert when there has been an oil leak.</p> <p>The nacelle will contain a banded area that will collect leaking oil.</p>	Low	Tier 1

			Oil seals will be regularly inspected and maintained as required.		
	Use of chemical	Potential for chemical spillage during use, e.g. solvents and cleaning products.	<p>Vessels will be equipped with spill kits and be available for use.</p> <p>A Safety Data Sheet (SDS) will be used for hazardous substances on the vessels, which will detail how the substance should be handled. All personnel handling hazardous substances should adhere to the SDS.</p> <p>Control of Substances Hazardous to Health (COSHH) assessments should be carried out.</p> <p>Hazardous substances will be stored in isolated storage facilities.</p> <p>Hazardous substances will be used in line with regulations and legislation.</p>	Low	Tier 1

### 3.3

## Estimated Oil and Chemical Inventory

Table 3-2 lists the types of substances that may be used at the Offshore Site and have been grouped accordingly as per the International Tanker Owners Pollution Federation (ITOPF) classifications. The ITOPF groups indicate the nature of the oils and their persistence once released into the environment. Group 4 oils, such as Bunker C fuel oil, are extremely persistent and will not evaporate or disperse, with Group 1 being least persistent and will disperse (ITOPF, 2024). The volume of oils on board the vessels will vary for each vessel and activity and will be detailed within the vessel's SDS. It is not anticipated that there will be Group 4 oils onboard the vessels conducting construction, operation, maintenance, and decommissioning activities.

*Table 3-2 Types of oils and chemicals that may be used*

Oil type	Oil group (ITOPF)	Uses
Intermediate Fuel Oil (IFO)	Group 3	Project vessels carrying out construction, operation activities; and  Jack-up vessels.
Marine Gas Oil (MGO) / Diesel	Group 2	Project vessels carrying out construction, operation activities.
Lubricating oil	Group 3	Project vessels carrying out construction, operational and maintenance activities.
Hydraulic oil	Group 2/3	Contained within infrastructure and equipment.
Chemicals	N/A	Different chemicals used during construction, operation, and maintenance activities.

## 4. **RESPONSE PROCEDURES AND CHECKLISTS**

### 4.1 **Pollution Incident Response Procedure**

#### 4.1.1 **Contact Information**

The key Project personnel of relevance to the MPCP will be summarised in a future plan iteration.

#### **Introduction**

##### 4.1.2

This Section outlines the measures that will be followed to respond to a potential or actual pollution incident that results in a spill into the marine environment and must be addressed and responded to promptly.

In the event of a spill, the primary focus is to ensure that all personnel are safe, to protect the offshore installations and vessels, and to prevent a marine pollution incident from escalating. Should the spill require an emergency response procedure, such as in the event of a fire, then the Emergency Response Co-operation Plan (ERCoP) should also be incorporated (see Appendix 5-4).

#### 4.1.3 **Spills Originating from a Vessel - Response and Notification Overview**

Should there be a marine pollution incident, where hydrocarbons or chemicals are spilled into the marine environment by an Offshore Site vessel or activity, the following processes should be adhered to:

- The Contractor Vessel Master should be notified when a spill has been noticed;
- It is then the responsibility of the Contractor Vessel Master to report at the earliest safe opportunity to the IRCG. In accordance with Standard Operating Procedure 01-2020 (IRCG, 2020a), verbal communication over the phone should be followed up with the submission of Initial Pollution Report (POLREP) by either email or fax to the IRCG and the Marine Coordinator;
- The Marine Coordinator will then submit the POLREP to the Project Manager; and
- The personnel (contractor/subcontractor) that is responsible for the originating vessel will use the SOPEP (or equivalent spill plan specific to that vessel) and manage the pollution incident, whilst providing regular updates on the status of the spill and managing the clean-up operations. Support will be provided by the Marine Coordinator and provide assistance with communication during the incident.
- The IRCG may take control should the event that the incident is raised to a regional (Tier 2) or national (Tier 3), and consider the process outlined in the National Maritime Oil/HNS Spill Contingency Plan (IRCG, 2020b).

4.1.4

## Spills Originating from an Installation Associated with the Offshore Site - Response and Notification Overview

The Marine Coordinator must be notified immediately after a spill is observed, the Marine Coordinator will then verbally report the incident to the IRCG and the Project Manager by phone. As above, verbal communication should be followed up with the submission of POLREP by either email or fax to the IRCG.

The Marine Coordinator should then consult the Applicants MPCP and categorise the spill into an appropriate Tier using the justifications outlined in Section 3.2.1. The Marine Coordinator is responsible for observing and reporting on the spill status and carrying out an immediate response, such as using a spill kit, if appropriate.

It is unlikely that oil spills originating from an installation will be classified as Tier 2 or Tier 3 as only a small volume of oil is associated with offshore wind turbines and offshore substation transformers. Therefore, it is anticipated that in the event of a spill, it could be managed locally and would not need to involve the IRCG. However, the Marine Coordinator must continue to provide updates on the spill status. It is not anticipated that the implementation of the National Maritime Oil/ HNS Spill Contingency Plan (Irish Coast Guard, 2020b) or for the IRCG to take command of an incident from an offshore installation. However, the IRCG will be kept informed by phone and the submission of the POLREP.

4.1.5

## Spills Within Port

The appropriate procedure to follow in the event of a spill occurring in the port/ harbour will be detailed within the Contractor/ Subcontractor's MPCP, the contractor/subcontractor is required to contact the relevant Port or Harbour Authority. The contractor/ subcontractor will provide the port authorities with details prior to any offshore works commence. The Project Manager and Marine Coordinator must be made aware of all incidents that are associated with Offshore Site vessels, activities, and installations, whether it occurs within or out of the Offshore Site.

4.2

## Reporting Requirements

All personnel associated with the Offshore Site, including employees, contractors, and subcontractors, are responsible for reporting all pollution incidents, including oil spills to the Project Manager and Marine Coordinator. Any major incidents must be reported immediately and escalated within 30 minutes. The IRCG will request information relating to the event, which will be used to support the incident appraisal process and will be used to determine the appropriate response process.

The personnel reporting the incident should provide as much detail as possible, however, reporting should not be delayed if there is some information remaining unknown. The Initial POLREP form is provided here.

## 4.2.1

## Initial Pollution Report (POLREP)

Initial Pollution Report			
To:	MRCC Dublin   Telephone +353 (0)1 662 0795   email mrccdublin@dtas.ie		
From:	Name of reporting Entity	Date and time of report:	
1	DATE & TIME OF OBSERVATION	Month, day and time that pollution was observed	
2	DATE & TIME OF OBSERVATION	Indicates who has reported the incident. If a ship, name, home port, flag and call sign must be given.	
3	POLLUTION POSITION AND EXTENT	Specifies the primary location of the pollution using latitude and longitude in degrees and minutes, and may also provide the distance and bearing from a prominent landmark familiar to the receiver. Estimates the amount of pollution (e.g., size of polluted areas, number of tonnes of oil spilled, or number of containers, drums, etc. lost). Indicates the length and width of the slick in nautical miles.	
4	POLLUTION CHARACTERISTICS	Specifies the type of pollution, such as the type of oil with its viscosity and pour point, or whether it involves packaged or bulk chemicals. For hazardous and noxious substances (HNS), provide the proper name or United Nations number if known. Additionally, describe the appearance, such as liquid, floating solid, liquid oil, semi-liquid sludge, tarry lumps, weathered oil, sea discoloration, or visible vapor. Any markings on drums, containers, etc., should also be noted."	
5	POLLUTION SOURCE AND CAUSE	E.g. from vessel, offshore unit or other. If from vessel, say whether as a result of a deliberate discharge or casualty. If the latter give brief description. Where possible, give name, type, size, call sign, nationality and port of registration of polluting vessel. If vessel is proceeding on its way, give course, speed and destination.	
6	WIND DIRECTION & SPEED	Specifies wind direction and speed in degrees and m/sec or knots. The direction always indicates from where the wind is blowing.	
7	CURRENT OR TIDE	Specifies current direction and speed in degrees and knots and tenths of knots. The direction always indicates the direction in which the current is flowing.	
8	SEA STATE AND	Sea state given as wave height in metres. Visibility in	

	VISIBILITY	nautical miles.
9	POLLUTION DRIFT	Specifies drift course and speed of pollution in degrees and knots and tenths of knots. In case of air pollution (gas cloud) drift speed is indicated in m/s.
10	FORECAST	E.g. arrival on beach with estimated timing. Results of mathematical models.
11	IDENTITY OR SHIPS ON SCENE	Specifies who has reported the incident. If a ship, name, home port, flag and call sign must be given.  Ships on scene can also be noted under this item by name, home port, flag and call sign, especially if the polluter cannot be identified and the spill is considered to be of recent origin.
12	ACTION TAKEN	Any action taken to combat the pollution.
13	PHOTOGRAPHS OR SAMPLES	Specifies if photographs or samples from the pollution have been taken. Communication addresses of the sampling authority should be given.

## 5.

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