

# Preliminary environmental information report (PEIR)

**Volume 2, Part 1, Appendix 1.5.C: Outline Construction  
Environmental Management Plan  
May 2025**

# Contents

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<b>1.5.C. Outline Construction Environmental Management Plan</b>	<b>1</b>
1.5.C.1 Document Purpose	1
1.5.C.2 Structure of the final CEMP	2
1.5.C.3 Project Overview	3
Project Description	3
Environmental Sensitivities	11
Scope and Objectives	11
Environmental Management Framework	12
1.5.C.4 Roles and Responsibilities	13
1.5.C.5 Management of Environmental Impacts	14
Aspects and Impacts	14
EGL 3 and 4 Environmental Commitments and Mitigations	14
1.5.C.6 Communication and Reporting	14
Communication Methods	14
Communication Protocol	15
Monitoring Environmental Impacts	16
Recording and Reporting Environmental Impacts	16
Auditing and Inspection for Environmental Compliance	17

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Table 1.5.C-1 - Final CEMP structure	2
Table 1.5.C-2 - Scope and indicative schedule for marine works	6
Table 1.5.C-3 - Responsibilities	13
Table 1.5.C-4 - Communications Protocol	15

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Plate 1.5.C-1: English Offshore Scheme draft Order Limits	4
Plate 1.5.C-2: Document Hierarchy	12

## Abbreviations

Abbreviation	
CEMP	Construction Environmental Management Plan
CLV	Cable Lay Vessel
DCO	Development Consent Order
dML	deemed Marine License
EPC	Engineering, Procurement and Construction
GW	Giga Watt
HDD	Horizontal Directional Drilling
HDPE	High Density Polyethylene
HVDC	High Voltage Direct Current
ICPC	International Cable Protection Committee
MBES	Multibeam Echo Sounder
MHWS	Mean High Water Spring
MMO	Marine Management Organisation
NSIP	Nationally Significant Infrastructure Project
CEMP	Outline Construction Environmental Management Plan
OOS	Out of Service
PLGR	Pre Lay Grapnel Run
RAMS	Risk Assessments and Method Statements
SBP	Sub Bottom Profiler
SoS	Secretary of State
SSS	Side Scan Sonar
The Applicant	National Grid Electricity Transmission plc
TSHD	Trailing Suction Hopper Dredger

## 1.5.C. Outline Construction Environmental Management Plan

### 1.5.C.1 Document Purpose

- 1.5.C.1.1 The document describes the Outline Construction Environmental Management Plan (CEMP) for use in UK waters during all Eastern Green Link 3 (EGL 3) and Eastern Green Link 4 (EGL 4) (hereafter referred to as English Offshore Scheme) construction phases. This Outline CEMP provides the principles to be followed for all construction activities. It is proposed that a separate CEMP be provided for the installation of the horizontal directional drilling (HDD) to allow these enabling works to commence ahead of full construction, which will follow the principles set out within this document.
- 1.5.C.1.2 Contractors engaged in the Construction of the English Offshore Scheme will be required to comply with the requirements of this Outline CEMP in full. Their own environmental management plans must reflect the objective and requirements set out in this document.
- 1.5.C.1.3 There are potential environmental effects associated with an offshore development which need to be identified and considered before construction takes place.
- 1.5.C.1.4 This Outline CEMP is provided as part of the Development Consent Order (DCO) application to demonstrate how commitments made with regards to environmental management are secured and will be taken forward for construction.
- 1.5.C.1.5 The purpose of this Outline CEMP is to set out the framework and principles for the CEMP produced for the construction phase of the project, it may be updated accordingly to cover the operational phase of the English Offshore Scheme. This Outline CEMP includes the controls that are proposed to manage the environmental risks associated with the construction of the English Offshore Scheme.
- 1.5.C.1.6 The scope of this Outline CEMP applies only to works associated with the offshore scheme below Mean High Water Springs (MHWS) and will be finalised prior to construction, setting out the controls and processes that are to be adopted to mitigate the offshore environmental impacts of the English Offshore Scheme. It will also document the environmental measures set out to comply with consent conditions in the deemed Marine Licences (dMLs).
- 1.5.C.1.7 A series of Contractors will be responsible for the detailed design, construction and installation of the main infrastructure associated with the English Offshore Scheme who must comply with the requirements set out within the final CEMP.
- 1.5.C.1.8 The final CEMP will be produced by the main Contractor, to discharge the relevant licence conditions and to communicate the environmental requirements and standards that must be incorporated into their sub-contractors Environmental Management Plans and Risk Assessments and Method Statements (RAMS). All Project Contractors (including sub-contractors) shall comply with the CEMP in all works undertaken. The Contractors (including sub-contractors) management plans



must be based on and comply with the requirements of the Outline CEMP and will be provided for approval in accordance with DCO Requirements.

## 1.5.C.2 Structure of the final CEMP

1.5.C.2.1 The final CEMP will include the following information:

- Details of relevant dML conditions;
- Overview of project activities to which the CEMP applies;
- Overview of relevant regulations and guidance;
- Details of the various plans and documents that interface with the CEMP and how they interface;
- Roles and responsibilities;
- Environmental objectives and targets;
- Environmental aspects and impacts;
- Training and awareness;
- Communication and stakeholder management;
- Documentation and records management;
- Arrangements for compliance monitoring and auditing;
- Approach to waste management;
- Approach to complaints and incident management;
- Arrangements and documentation for marine pollution contingency planning (Marine Pollution Contingency Plan);
- Dropped objects protocol; and
- Arrangements for chemicals risk assessment and management (Chemical Risk Assessment).

1.5.C.2.2 **Table 1.5.C-1** displays how the final CEMP will be structured:

**Table 1.5.C-1 - Final CEMP structure**

Section	Description
Section 1 & 2	Provides an overview of the English Offshore Scheme. Sets out the purpose and scope of the CEMP, details environmental management framework, including document hierarchy and the process for making updates and amendments.
Section 3	Describes the roles and responsibilities of the various parties.
Section 4	Sets out the measures to be implemented for the management of environmental aspects and compliance obligations, including specific issues including (but not limited to) marine pollution, waste, dropped objects and underwater noise.

Section	Description
Section 5	Describes the processes to be followed to establish effective communication and reporting, including holding toolbox talks, recording environmental impacts and environmental auditing.

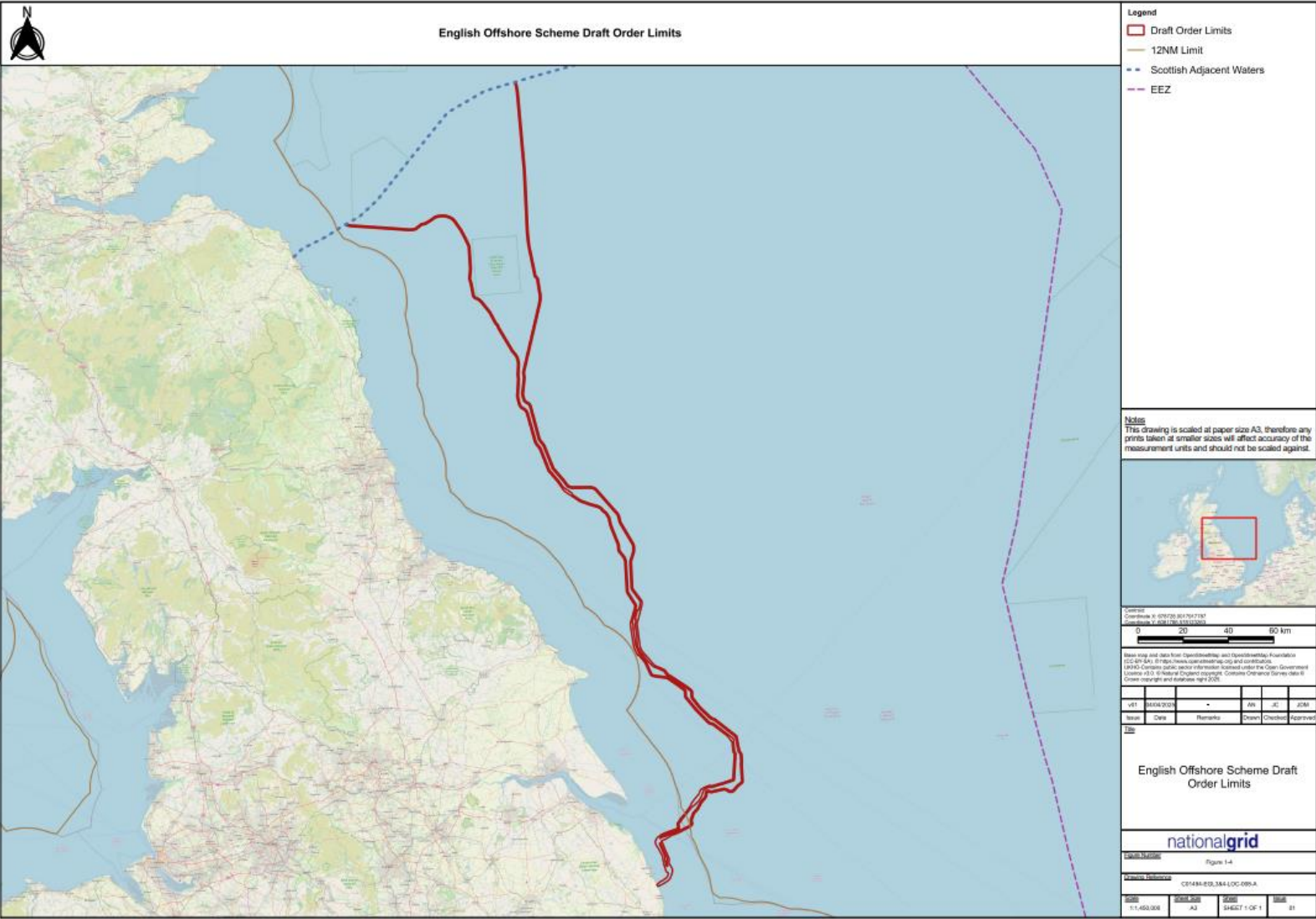
- 1.5.C.2.3 Subsequent updates, following the initial approval of the CEMP by the Marine Management Organisation (MMO), will be provided to the MMO for information and to ensure that they hold an up-to-date copy.

### 1.5.C.3 Project Overview

#### Project Description

- 1.5.C.3.1 EGL 3 comprises a 2-gigawatt (GW) high-voltage direct current (HVDC) link between Aberdeenshire in Scotland, and King's Lynn and West Norfolk in England. EGL 4 comprises a 2 GW HVDC link between Fife in Scotland and King's Lynn and West Norfolk. EGL 3 and EGL 4 each comprise over 600 km of subsea and underground HVDC cables between new converter stations at each end of the electricity transmission link. Both EGL 3 and EGL 4 are classified as a Nationally Significant Infrastructure Project (NSIP) under the Section 15 (3) of Planning Act 2008. Such Projects require a DCO to be granted by the relevant UK Secretary of State (SoS).
- 1.5.C.3.2 The English Offshore Scheme comprises of the draft Order Limits which incorporates both EGL 3 and EGL 4. Where the separation between the EGL 3 and EGL 4 draft Order Limits is greater than 500 m, these are shown with separate corridors of 500 m minimum width. Where the separation of the draft Order Limits is less than 500 m, the corridor is shown as a single corridor. However, where the indicative cable alignment is within one combined corridor, a separation distance between the EGL 3 and EGL 4 cables will be defined (see **Plate 1.5.C-1**).

Plate 1.5.C-1: English Offshore Scheme draft Order Limits



- 1.5.C.3.3 Each construction programme is expected to take approximately 55 months from start to finish. The project is envisaged to commence on-site construction in 2028/2029 for both EGL 3 and EGL 4 and be fully operational by 2033.
- 1.5.C.3.4 The exact timing of the subsea cable installation works will be dependent upon the date of the contract award for the works, time required for detailed design and cable manufacture, availability of cable installation and other vessels and any restrictions to mitigate potential effects on features of conservation interest, fisheries or other sensitive receptors. **Table 1.5.C-2** presents the main activities to be undertaken and provides an indicative schedule for each activity.



**Table 1.5.C-2 - Scope and indicative schedule for marine works**

Activity	Description	Indicative Schedule:	
		EGL 3	EGL 4
Onshore Construction			
Site set-up	A temporary construction compound and laydown area would be set up at the Anderby Creek Landfall location. This compound will store all materials necessary for the works, including plant, waste, cable ducts, cable drums and accessories. In addition to storage, compounds also provide a location for site offices and welfare facilities for construction operatives. These works would be above MHWS but are required to enable the Anderby Creek Landfall HDD. This will be covered in more detail in the Outline Code of Construction Practice (Outline CoCP) <b>(Volume 2, Part 1, Appendix 1.5.B Outline CoCP)</b> .	Following consent award (subject to discharge of DCO Requirements / dML conditions)	Following consent award (subject to discharge of DCO Requirements / dML conditions)
Horizontal Directional Drilling and Duct Installation	<p>Two cable ducts are to be created using a trenchless solution such as HDD. The purpose of the HDD is to create a bore from above MHWS to below MLWS, through which a High-Density Polyethylene (HDPE) conduit/duct containing the fibre optic cable and the HVDC cable can be passed. Multiple ducts will be installed per offshore scheme. The cable ducts would exit in the nearshore (between 0 m and 8 m LAT).</p> <p>The HDD would start on land and be directed out to sea.</p> <p>Offshore support will likely be required as the duct is pushed into the bore A support vessel with a crane will be needed to guide the duct during punch out at the exit point.</p> <p>The primary HDD activity that interacts with the marine environment is when the HDD breaks through the sediment (or punches out) onto the seabed.</p>	Following consent award (subject to discharge of DCO / dML conditions)	Following consent award (subject to discharge of DCO / dML conditions)

Activity	Description	Indicative Schedule: EGL 3	EGL 4
Seabed Preparation			
Pre-lay survey	A Pre-Lay Geophysical survey would be undertaken which may use the following techniques: Swathe and Multibeam Echo Sounder (MBES), Side Scan Sonar (SSS), Sub Bottom Profiler (SBP) and Magnetometer.	2028 - 2031	2028 – 2030
UXO target investigation	An ROV or diver survey would be undertaken to investigate any potential UXO targets identified. This may involve small excavations around the potential UXO to confirm its identity.  Note these works may be consented via separate marine licence outside the DCO.	2028	2028
Pre-lay grapnel run (PLGR)	The PLGR would be undertaken to clear any debris from the seabed. The PLGR may therefore be undertaken in one single phase prior to the first installation campaign or in separate phases prior to each installation campaign to ensure the route is clear of debris.  A multi-cat or towing vessel will pull a grapnel train consisting of a series of different sized grapnels. The typical grapnel will penetrate the seabed to a depth of 0.1 m to 0.3 m depending on the soil conditions and the grapnel configuration.	2029 - 2031	2029 – 2033
Crossing of third-party infrastructure, preparation	OOS (Out of Service) cables that are crossed by the Proposed Works may hamper cable installation. At the location of known OOS cables, a de-trenching grapnel would be deployed to retrieve the OOS cable from the seabed. The section of the OOS cable blocking the subsea cable route would be cut away and removed, after having obtained approval from the owner.  The length of cable to be removed would be agreed with the asset owner in advance, but typically a section 100 m long, 50 m either side of the centre line, would be removed. For the purposes of assessment, it has been assumed that a maximum of 200 m of OOS cable would be removed.	2029 - 2031	2029 – 2033

Activity	Description	Indicative Schedule:	
		EGL 3	EGL 4
	<p>The ends of the OOS cables would be secured to the seabed in accordance with International Cable Protection Committee (ICPC) recommendation No 1, i.e., with flat (or low profile) clump weights which reduces the risk of hooking behind the cable ends by, for instance, fishing gear. Clump weights may be buried in line with agreed mitigation.</p> <p>The clearance of OOS cables would be undertaken by a construction support vessel during the seabed clearance campaign.</p> <p>Where cables and pipelines are still in operation or cannot be removed, crossings will need to be made. These typically involve placing a protective material over the third-party asset, which would be placed at the same time as other route preparation activities. Once the cable has been laid over the protective material, a secondary layer of rock or mattresses would be laid over the cables to protect them.</p>		
Sandwave removal	<p>There are areas of mega ripples (wave heights &lt;1.5 m) and sandwaves (wave heights &gt; 1.5 m) present along the English Offshore Scheme cable corridor.</p> <p>Prior to the installation of the subsea cables the cable route (10 m – 20 m width either side of the cable bundle) pre-sweeping would be used to reduce the height of seabed undulations or sandwaves along the cable route. Pre-sweeping may be required to reduce the height of the seabed undulations or sandwaves along the cable route. Pre-sweeping would be used to create a level seabed for the installation equipment to move along. This would improve the chances for the cables to achieve the target burial depth within the Non-Mobile Reference Level and to be maintained during the operational lifecycle.</p> <p>Pre-sweeping would be undertaken by either a controlled flow excavator (CFE) or trailing suction hopper dredger (TSHD).</p>	2029 - 2031	2029 – 2033

Activity	Description	Indicative Schedule:	
		EGL 3	EGL 4
Offshore Construction			
Cable pull-in and cable lay and Burial	<p>Following the completion of preparation activities, the cable would be ready to be laid. The cable lay vessel (CLV) would stand off a short distance from the HDD exit point. A winch rope would be floated out to the CLV from the HDD exit point. The rope would be attached to the cable and winched back in pulling the cable behind. Floats will be attached to the cable. When the cable reaches the HDD exit point, divers would start to remove the floats allowing the cable to enter the HDD.</p> <p>The cable pull would continue until the cable enters the transition joint bay at the HDD entrance. Once the cable is in position, the remaining floats would be removed and the cable will be allowed to sink to the seabed, monitored by divers.</p> <p>Once the cables have been pulled through to shore, the CLV would proceed to move away from the Anderby Creek Landfall along the cable route laying and burying the cable to the required depth of lowering.</p>	2029 - 2033	2029 - 2033
Jointing	<p>CLVs are limited in the length of cable they can carry in a single load (typically 5,000 to 10,000 tonnes). For the cable system design this equates to cable lengths in a bundled configuration of 80 – 100 km. Sections of offshore cables are connected by a cable joint and the cable system would therefore require a number of joints within the English Offshore Scheme due to its length.</p> <p>At each cable joint position, the end of the installed cable would be temporarily left on the seabed whilst the CLV returns to port to pick up a new cable length. A ground wire would be attached to the cable end to enable retrieval when the cable lay vessel returns. The cable end may be temporarily buried into the seabed, marked with a buoy and/or guarded by a guard vessel whilst the cable lay vessel is offsite.</p>	2029 - 2033	2029 - 2032

Activity	Description	Indicative Schedule:	
		EGL 3	EGL 4
	<p>The cable joint would be made on board the CLV and would take up to two weeks per joint location. During this time the CLV would maintain position. Once the cable joint has been made, the CLV would continue to lay the new cable section.</p> <p>The joint and cables would be buried (as the preference) or protected by external cable protection.</p>		
Remedial - external cable protection	If any part of the cables cannot be buried to the target depth, remedial rock protection may be installed. A fall pipe vessel will be used to position the rock over the cables to the desired berm profile. Any remedial works would be subject to the dML Conditions.	2029 - 2033	2029 - 2033
Post-lay survey	<p>Geophysical surveys would be undertaken periodically to monitor cable burial and the status of external cable protection e.g., remedial or at infrastructure crossings.</p> <p>In areas of high seabed mobility, or if post-installation changes in the natural or manmade environment are perceived to have occurred (for example through an increase in adjacent dredging activity), additional survey of specific areas of the cable system may be initiated.</p>	2029 - 2033	2029 - 2033



## Environmental Sensitivities

- 1.5.C.3.5 Details of the environmental characteristics of the English Offshore Scheme and environmental sensitivities are further detailed in each of the technical chapters. **Volume 2, Part 1, Appendix 1.5.A: Outline Register of Design Measures** provides a preliminary list of all environmental measures being proposed specific to the design and operations of the EGL 3 and EGL 4.
- 1.5.C.3.6 The final CEMP will set out the relevant controls and procedures to be adopted to mitigate the environmental impacts associated with the project. These measures will be specific to the final design of the Project and subject to further stakeholder engagement.
- 1.5.C.3.7 The final CEMP will set out measures to avoid, reduce or mitigate impacts.

## Scope and Objectives

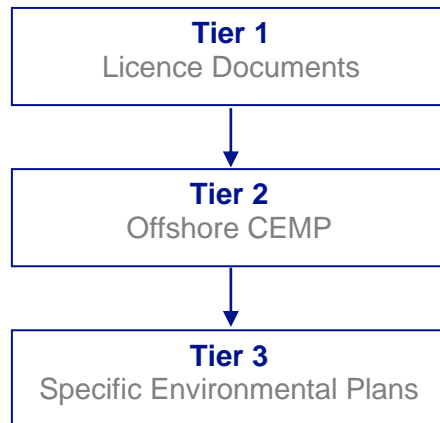
- 1.5.C.3.8 The CEMP is a tool to set out the Project's commitment and approach to environmental management. It will ensure that the Licensing Authorities (and its advisers), as well as the Licence Holder and all and any Contractors (including sub-contractors) engaged during the pre-construction and construction phase of the project, are advised of the responsibilities for licenses, consents discharge and environmental protection as well as the manner in which consents will be discharged.
- 1.5.C.3.9 The overarching objectives of the CEMP are:
- to ensure construction activities will be undertaken in an environmentally responsible manner; and
  - to provide construction Contractors with concise, clear and practical details of the environmental management measures and licence obligations that will be implemented and with which they must comply.
- 1.5.C.3.10 The final CEMP may include the following:
- Outline the applicable licences and permissions.
  - Highlight the mitigation that is required to comply with the licences and permissions.
  - Provide the overarching framework for environmental management, highlighting the hierarchy of documentation that will be used to manage environmental impacts during the offshore construction works.
  - Provide details of responsibilities in relation to environmental management.
  - Detail how environmental compliance will be audited and reported.
  - Ensure consistency in approach and performance of environmental management across National Grid Electricity Transmission plc (NGET) and its Contractors during the offshore construction works.

## Environmental Management Framework

### *Document Hierarchy*

1.5.C.3.11 A three-tiered hierarchy will be in place to ensure that environmental standards will be met and are maintained throughout the Project. The system is outlined in **Plate 1.5.C-2** below:

#### **Plate 1.5.C-2: Document Hierarchy**



1.5.C.3.12 The final CEMP will be a Tier 2 document and will be supported by additional topic specific environmental management plans (Tier 3 documents) once confirmed these will be detailed in **Section 1.5.C.3.13**.

### *Relevant Tier 3 Plans*

1.5.C.3.13 The Tier 3 specific environmental plans that may support the final CEMP include:

- Cable Burial Risk Assessment;
- Marine Mammal Mitigation Plan;
- Marine Pollution Contingency Plan;
- Waste Management Plan;
- Biosecurity Plan; and
- Fisheries Liaison and Co-Existence Plan.

### *Relevant Legislation and Regulations*

1.5.C.3.14 In addition to the project specific conditions that will be laid out in the consents, all Contractors (and their sub-contractors) are responsible for identifying and complying with all relevant UK legislation in place at the time of the activities occurring.

## 1.5.C.4 Roles and Responsibilities

1.5.C.4.1 Responsibility for the project in relation to the Outline CEMP will be divided into two parts: responsibilities assigned to organisations and those assigned to individual roles. Organisational responsibilities are summarised in **Table 1.5.C-3** below, role-specific responsibilities will be outlined in the final CEMP within a RACI (Responsible, Accountable, Consulted, Informed) matrix or similar.

**Table 1.5.C-3 - Responsibilities**

Organisation	Responsibility	Contact Details
NGET	Licence Holder <ul style="list-style-type: none"> <li>• License holder to appoint a suitably competent Engineering Procurement Construction (EPC) Contractor to undertake the work, ensure and monitor compliance with licence conditions and submit notifications.</li> </ul>	TBC
Installation Contractor TBC	EPC Contractor <ul style="list-style-type: none"> <li>• Responsible for the manufacture, transport and installation of the offshore power cables.</li> <li>• Responsible for discharging environmental consent obligations on behalf of the Licence Holder (where required).</li> <li>• Responsible for monitoring the environmental performance of all sub-contractors and ensuring that they remain compliant with the CEMP.</li> <li>• Responsible for ensuring that environmental audits take place on a regular and planned basis and that all and any suspected breaches of environmental legislation, policy, best practice or guidance are fully investigated and reported, including reporting of spills.</li> <li>• Responsible for ensuring that the CEMP is kept up-to-date and available for dissemination to all parties as necessary and appropriate.</li> </ul>	TBC
Sub-Contractors TBC	To comply with the requirements of the EPC Contractors Environmental Management Plans	TBC

1.5.C.4.2 All Contractors will also be required to produce RAMS and implement management controls as appropriate within their RAMS, which shall be reviewed by the Applicant. The RAMS will also make reference to the relevant elements of various guidance that will be implemented as part of their management controls.

## 1.5.C.5 Management of Environmental Impacts

### Aspects and Impacts

- 1.5.C.5.1 All Contractors undertaking works for the English Offshore Scheme will be required to produce aspects and impacts registers related to the works. Such registers will include details of:
- Aspects associated with (but not limited to) emissions to air, water, land and groundwater; waste production, storage and disposal; chemical use and management; transport; and use of amenities and utilities; and
  - Details of potential impacts, legal and other requirements; and environmental management measures.

### EGL 3 and 4 Environmental Commitments and Mitigations

- 1.5.C.5.2 Full details of all commitments and associated mitigations will be provided with the ES. A preliminary register of design measures is provided in **Volume 2, Part 1, Appendix 1.5.A: Outline Register of Design Measures**.
- 1.5.C.5.3 The final CEMP will detail the mitigations and other measures included in the various RAMS.

## 1.5.C.6 Communication and Reporting

### Communication Methods

#### *Availability and Update of Documents*

- 1.5.C.6.1 The CEMP will be updated at least six months prior to construction commencing or within the specified timescales within the dML, and submitted to the MMO, in consultation with relevant stakeholders for review and approval.
- 1.5.C.6.2 It will also be reviewed quarterly during construction. These reviews will focus on:
- changes in roles and responsibilities of the EGL 3 and EGL 4 Project team;
  - changes in legislative or other requirements;
  - changes to processes or procedures; and
  - changes in project phases – e.g., the plan will be updated prior to commencement of the operations and maintenance phase of the project.
- 1.5.C.6.3 Subsequent updates, following initial approval of the document by the MMO, will be provided to the MMO for information and to ensure they hold an up-to-date copy.

#### *Site Inductions and Training*

- 1.5.C.6.4 All Contractors (including all sub-contractors) engaged in delivering the English Offshore Scheme have a responsibility to ensure that the relevant environmental information is assessed and appropriately disseminated to site personnel. The key method by which this may be achieved is through the completion of site induction briefings, although additional methods may be employed to ensure industry leading practice is followed.

- 1.5.C.6.5 Site inductions should be held prior to commencement of the offshore construction activities to ensure that all personnel are familiar with the vessel, in particular the safety protocols and location of emergency equipment. Site inductions will typically be given by the Quality, Health, Safety and Environment department and will include environmental awareness and the requirements of this Outline CEMP. The Masters of installation and support vessels will give a safety briefing on board the vessel prior to departure.
- 1.5.C.6.6 Contractors (and their sub-contractors) will provide specific toolbox talk briefings to personnel involved in construction activities prior to commencing work. These talks will detail the environmental risk assessments performed by the Contractor(s) and confirm control measures to implement and mitigate the likelihood of the work impacting upon the environment. Subjects for inclusion within toolbox talks may include, but will not be limited to:
- Environmental policy;
  - Dealing with oil and chemical spills including types of spill kits and their use;
  - Waste management including storage, separation and handling of waste;
  - Marine Invasive Non-Native Species (MINNS);
  - Marine mammal mitigation procedures;
  - Dropped objects; and
  - Archaeological compliance and reporting.

### Communication Protocol

- 1.5.C.6.7 **Table 1.5.C-4** details the communication protocol with regard to this Outline CEMP. The final CEMP will outline the communication protocols in more detail.

**Table 1.5.C-4 - Communications Protocol**

Issue	Communication Requirements
Change in construction method	Contractor to advise The Applicant as soon as made aware. The Applicant to advise Contractor whether changes should be considered material and appropriate discussions be undertaken with Licensing Authority.
Change to agreed mitigation	Contractor to advise The Applicant as soon as made aware. The Applicant to advise Contractor whether changes should be considered material and appropriate discussions be undertaken with Licensing Authority. The Applicant to liaise with regulators and statutory consultees as appropriate.
Major environmental non-compliance	Contractor to advise The Applicant as soon as made aware. Contractor to advise The Applicant (within 30 minutes) and Licensing Authority and other relevant bodies as outlined in relevant Tier 3 document. For the avoidance of doubt, in the event of a major non-compliance incident, the Contractor should not delay in implementing appropriate and



Issue	Communication Requirements
	<p>agreed mitigation measures and reporting the incident directly to the appropriate body.</p> <p>EPC Contractor Project Manager to record all environmental non-compliances in the non-conformance register.</p>
Minor environmental non-compliance	<p>Contractor to advise The Applicant as soon as aware of all incidents on non-compliance, and subsequent actions taken.</p> <p>EPC Contractor Project Manager to investigate all non-compliance incidents.</p> <p>EPC Contractor Project Manager to inform The Applicant of all non-compliance incidents within 30 minutes.</p> <p>EPC Contractor Project Manager to record all environmental non-compliances in the non-conformance register.</p>
Waste disposal	<p>Contractor to provide own Waste Management Plan to form part of the English Offshore Scheme CEMP.</p>
Stakeholder communication	<p>Consents and environmental related communication to be managed by either EPC Contractor or the Applicant as appropriate. Contractor(s) should not engage directly with statutory stakeholders on matters concerning licenses, consents or permissions without prior agreement from the Applicant (except in cases of emergency).</p>

## Monitoring Environmental Impacts

- 1.5.C.6.8 The EPC Contractor will maintain all environmental registers required under the licence obligations and make available to the Applicant throughout the duration of the works.
- 1.5.C.6.9 Contractors (and their sub-contractors) shall document the results of compliance with the relevant environmental standards and this Outline CEMP throughout the project via the Daily Progress Report and shall provide any supporting documentation on a regular basis (e.g., monthly). Each and any Contractor(s) shall be responsible for appointing their own company Environmental Manager who shall manage co-ordinate and check compliance with this Outline CEMP throughout their involvement in the Project.

## Recording and Reporting Environmental Impacts

- 1.5.C.6.10 All Contractor(s) shall monitor and record environmental impacts related to their involvement during construction, including but not limited to:
- Waste types and amounts in accordance with their Waste Management Plan;
  - Audit and inspection results;
  - Compliance with consent conditions;
  - Reported incidents including near misses; and
  - Environmental non-compliance.
- 1.5.C.6.11 This information must be reported to the Applicant as part of the Contractor's monthly progress report.

## **Auditing and Inspection for Environmental Compliance**

1.5.C.6.12 The EPC Contractor Client Representative onboard the vessel will monitor onboard activities to ensure compliance with the final CEMP. The final CEMP will also be reviewed after each construction and any lessons learned/actions identified during the review will be carried forward to an update.

National Grid plc  
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Warwick Technology Park,  
Gallows Hill, Warwick.  
CV34 6DA United Kingdom

Registered in England and Wales  
No. 4031152  
[nationalgrid.com](http://nationalgrid.com)