

The Great Grid Upgrade

Eastern Green Link 5 (EGL 5)

Preliminary Environmental Information Report

Volume 2

Part 1

Appendix 5.C Outline Construction Environmental
Management Plan

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Eastern Green Link (EGL) 5

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5.C. Outline Construction Environmental Management Plan

5.C.1. Introduction

Purpose and objectives of this document

- 5.C.1.1. This Outline Construction Environmental Management Plan (CEMP) has been prepared on behalf of National Grid Electricity Transmission (NGET) (the 'Applicant'). It forms part of the application for a Development Consent Order (DCO) to the Secretary of State for Eastern Green Link 5 (EGL 5).
- 5.C.1.2. EGL 5 is a two gigawatt (GW) High Voltage Direct Current (HVDC) system linking Peterhead, Aberdeenshire and Anderby Creek, Lincolnshire. It is a joint venture between the Applicant and Scottish and Southern Electricity Network Transmission (SSEN-T). The Applicant is responsible for all onshore infrastructure in England, and offshore infrastructure in English waters. SSEN-T are responsible for the onshore infrastructure in Scotland and offshore infrastructure in Scottish waters.
- 5.C.1.3. For seeking necessary consents, EGL 5 has been split into 'Schemes' i.e., English Onshore Scheme, English Offshore Scheme, Scottish Onshore Scheme, and Scottish Offshore Scheme. These schemes are outlined in **Volume 1, Part 1, Chapter 1: Introduction** of the Preliminary Environmental Information Report (PEIR).
- 5.C.1.4. There are potential environmental effects associated with the English Offshore Scheme which need to be identified and considered before construction begins. This Outline CEMP is written with specific regard to the English Offshore Scheme and provides the overarching framework for environmental management during the construction of the English Offshore Scheme. It has been prepared to demonstrate how environmental commitments made are secured and will be taken forward for construction.
- 5.C.1.5. Should the English Offshore Scheme be granted consent by way of a DCO, a CEMP would be developed for the English Offshore Scheme by the appointed Engineering, Procurement and Construction (EPC) Contractor and agreed with relevant stakeholders in accordance with the requirements of the deemed Marine Licence (DML), following the principles set out in this Outline CEMP. The CEMP would be updated accordingly to cover the operational phase of the English Offshore Scheme.
- 5.C.1.6. A phased approach to the discharge of DML conditions and the implementation of the CEMP may be taken, allowing early works such as the Anderby Creek Landfall trenchless technique and enabling works for the converter station to proceed ahead of the main construction works. In this instance, a Cable Specification and Installation Plan (CSIP) would be prepared by the EPC Contractor.
- 5.C.1.7. An Outline Code of Construction Practice (CoCP) has been prepared for all components of the English Onshore Scheme from Mean Low Water Springs (MLWS) at the Anderby Creek Landfall to the connection point at the proposed Lincolnshire

Connection Substation B. **Volume 2, Part 1, Appendix 5.B: Outline Code of Construction Practice.**

5.C.1.8. The overarching objectives of the Outline 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.

5.C.1.9. All staff, contractors and subcontractors involved in the construction of the English Offshore Scheme will be required to comply with the requirements set out within the CEMP. Their own environmental management plans must reflect the objectives and requirements set out in this document.

5.C.1.10. 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 DCO and DML requirements in **Table 5.C-1** which will be set out within the CEMP.

5.C.1.11. The CEMP will be produced by the EPC 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). The EPC Contractor (including subcontractors) shall comply with the CEMP in all works undertaken. The EPC Contractor’s (and subcontractors) 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 / DML Requirements.

Table 5.C-1 DCO / DML Conditions Discharged by the CEMP

DCO / DML Reference	Condition Reference	Condition	Relevant Section
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Structure of this Outline CEMP

5.C.1.12. Table 5.C-2 outlines the structure of this Outline CEMP.

Table 5.C-2 Outline CEMP structure

Section	Description
	Provides an overview of the Project.
Section 5.C.1 & 5.C.2	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 5.C.3	Describes the relevant legislation and guidance.

Section	Description
Section 5.C.4	Sets out the roles, responsibilities and measures for environmental training and awareness measures.
Section 5.C.5	Describes the processes to be followed to establish effective communication and update to documents.
Section 5.C.6	Sets out the process for the environmental monitoring and compliance, including holding toolbox talks, recording environmental impacts and environmental auditing.
Section 5.C.7 & 5.C.8	Details the control and management measures to reduce impacts from the English Offshore Scheme on the environment

5.C.1.13. The CEMP will expand on the above structure and include but not limited to 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 (MPCP);
- Dropped objects protocol;
- Arrangements and documentation for Waste Management Plan; and
- Arrangements and documentation for Biosecurity Plan.

5.C.1.14. 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.

5.C.1.15. The CEMP will likely contain the following documents as Annexes, which the EPC Contractor will be required to adhere throughout construction:

- Marine Pollution Contingency Plan (MPCP)

- Waste Management Plan (WMP);
- Biosecurity Plan; and
- Dropped object procedure.

Document control and location

- 5.C.1.16. Following approval of the CEMPs prior to construction works commencing, the CEMP will be a 'live' document that will be maintained by the EPC Contractor during the construction stage (with relevant input from the Applicant and subcontractors), as required, at agreed intervals or at the request of the MMO. Updates to the CEMP may relate to changes in construction methodologies, new or updated mitigation measures, changes in guidance or legislative requirements, or to reflect newly identified environmental sensitivities ahead of construction.
- 5.C.1.17. Any updates to the CEMP will be communicated to the MMO, and if required, the CEMP will be re-submitted for approval.
- 5.C.1.18. The CEMP will be distributed to all relevant parties in accordance with a Distribution List. If updates to the CEMP are made, all previous versions will be superseded.

Linkages with Other Management Plans

- 5.C.1.19. There will be linkages between the CEMP and other management plans that will be produced by the Applicant, EPC Contractor and subcontractors to ensure compliance with DML consent conditions as detailed in **Table 5.C-1**. These linkages will be provided in **Table 5.C-3** of the CEMP.
- 5.C.1.20. At this stage, the list of final management plans that will be required is not known. However, where commitments to specific management plans have been identified within **Volume 1** of the PEIR, these have been listed below:
- Code of Construction Practice (CoCP);
 - Cable Specification and Installation Plan (CSIP) (incorporating measures to control and manage drilling fluid and frac-out);
 - Fisheries Liaison and Co-Existence Plan (FLCP);
 - Marine Mammal Mitigation Plan (MMMP); and
 - Written Scheme of Investigation (WSI) and Protocol for Archaeological Discoveries (PAD).
- 5.C.1.21. As management plans are updated, inter-linkages will be reviewed and relevant management plans will be updated as required. A nominated individual will be responsible for ensuring all management plans are up to date and revised in accordance with relevant timescales.

Table 5.C-3 Links with other Management Plans

Management Plan	Linkage with CEMP
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5.C.2. English Offshore Scheme

Location

- 5.C.2.1. The key elements of the English Offshore Scheme are up to 423 km of subsea HVDC cable from the Anderby Creek Landfall, Lincolnshire to where it meets the boundary between English and Scottish waters. The subsea cable system would consist of two HVDC cables and a fibre optic cable for control and monitoring purposes. A full description of the of EGL 5 is provided in **Volume 1, Part 1, Chapter 4: Description of the Project**.
- 5.C.2.2. The location of the English Offshore Scheme is illustrated by the draft Order Limits in **Figure 1-1 in Volume 1, Part 1, Chapter 1: Introduction** of the PEIR. The draft Order Limits are nominally 1 km wide, the width of the route varies along the route to accommodate sensitivities such as challenging ground conditions, archaeology and ecological sensitivities. The draft Order Limits provide a degree of flexibility as the cables could be laid anywhere within the defined limits.

Description of the English Offshore Scheme

- 5.C.2.3. The CEMP will provide a summary of the key activities that will be executed during the construction of the English Offshore Scheme. Full details of the methods and specifications for cable burial and protection will be included in the Cable Specification and Installation Plan (CSIP) informed by the Cable Burial Risk Assessment (CBRA).
- 5.C.2.4. Pre-Construction and Construction activities that will be detailed in full within the CEMP include, but not limited to;
- Pre-installation surveys including:
 - Geophysical surveys using methods such as Multi-Beam Echosounder (MBES), Side Scan Sonar (SSS), Sub-Bottom Profiling (SBP) and magnetometer;
 - Geotechnical Surveys using methods such as boreholes, vibrocores and cone penetrometer testing; and
 - Environmental Surveys using grab sampling, drop down video or Remotely Operated Video (ROV);
 - Unexploded Ordnance (UXO) Identification and Clearance (note UXO clearance is subject to a separate marine licence application and excluded from this DCO application);
 - Route Preparation including Boulder Clearance, Pre-lay Grapnel Run (PLGR), Cable Burial Trial Trenching, Preparation for Infrastructure Crossings;
 - Anderby Creek Landfall Enabling Works and Cable Pull-in;

- Cable Installation; and
- Rock Placement.

Indicative Programme

- 5.C.2.5. Construction of the English Offshore Scheme is anticipated to commence in 2030 and be fully operational by 2035. Works at the Anderby Creek Landfall may commence in 2031 with installation of the ducts ahead of the main construction works.
- 5.C.2.6. The construction programme would be developed as the Project progresses and would take account of environmental conditions (e.g., weather, tides, currents), operational downtime, variable lead times for vessels and equipment, supply chain bottlenecks, consenting timeframes, detailed design as well as implementation of any required mitigation measures for environmental sensitivities or sensitive receptors.
- 5.C.2.7. The English Offshore Scheme, including the trenchless technique at the Anderby Creek Landfall would be a 24-hour operation to minimise overall installation time, maximise the use of suitable weather and current windows and take advantage of vessel and equipment availability.
- 5.C.2.8. **Table 5.C-4** presents the main activities to be undertaken and provides an indicative schedule for each activity. The full construction programme will be provided in **Table 5.C-4** within the CEMP.
- 5.C.2.9. Further information on the above activities can be found in **Volume 1, Part 1, Chapter 4: Description of the Project** of the PEIR.

Table 5.C-4 Description of Construction Activities and Indicative Schedule for the English Offshore Scheme

Activity	Description	Indicative Schedule
Landfall Construction		
Trenchless Technique and Duct Installation	The landfall will be constructed using a trenchless technique. Two cable ducts will be installed from the Transition Joint Bay (TJB), positioned above the MHWS mark, to a point below 0 m lowest astronomical tide (LAT) per Project. The trenchless technique will 'punch out' (exit the seabed) between the 3 m and 6 m LAT water depth contours. A support vessel with a crane will be needed to guide the duct during punch out at the exit point.	2031
Seabed Preparation		
Pre-lay Survey	A pre-lay geophysical survey will be undertaken which may use the following techniques: Swathe and MBES, SSS, SBP and Magnetometer. Geotechnical surveys consisting of cone penetration tests and/or vibrocores and environmental surveys using drop down video and grab sampling may also be undertaken.	2030

Activity	Description	Indicative Schedule
Unexploded ordnance (UXO) Target Investigation	<p>An ROV or diver survey will be undertaken to investigate any potential UXO targets identified. This may involve small excavations around the potential UXO to confirm its identity.</p> <p>Note these works are not being consented as part of the DCO and therefore are not considered further within this Outline CEMP</p>	2030 – 2031
Pre-lay Grapnel Run (PLGR)	<p>The PLGR will be undertaken to clear any debris from the seabed prior to cable installation to ensure the cable route is clear of snagging risks. The PLGR is a wire with specially designed hooks or grapnels at intervals along its length that is towed behind a vessel. Due to the length of the cable as described above, installation (and consequently the PLGR) may be undertaken as a single phase or over several campaigns.</p>	2031 – 2032
Boulder Clearance	<p>Geophysical data would be used to inform the requirement for boulder clearance within the English Offshore Scheme Order Limits. Where possible, micro-routeing around boulders would be undertaken, however, where there are large volumes of boulders present, micro-routeing may not be feasible and therefore clearance of boulders from the route of the cables route would be required to allow the use of burial equipment.</p>	2031 – 2032
Crossing of Third-party Infrastructure Preparation	<p>OOS (Out of Service) cables that are crossed by the proposed works may be removed prior to installation. The clearance of OOS cables will be undertaken by a construction support vessel during the seabed clearance campaign.</p>	2031 – 2032
Sandwave Clearance	<p>Prior to the installation of the subsea cables pre-sweeping will be used to reduce the height of seabed undulations or sandwaves along the cable route to create a level seabed for the installation equipment to move along. This will 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 a trailing suction hopper dredger or controlled flow excavator.</p>	2031 – 2032
Cable Burial Trial Trenching	<p>Trial trenching, if required to test the capabilities of the trenching tool to meet depth of burial requirements, will be undertaken within the Order Limits. The trial trenching will use the same methodology as that proposed for the installation of the cables.</p>	TBC

Activity	Description	Indicative Schedule
Offshore Construction		
Cable Pull-in, Cable Lay and Burial and Crossings	<p>Following the completion of preparation activities, the cable would be laid.</p> <p>Once the cables have been pulled through the landfall ducts to shore, the Cable Lay Vessel (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. As well as completing any infrastructure crossings required along the route by installing external cable protection.</p>	2031 - 2034
Jointing	<p>Sections of offshore cables will be connected by a cable joint.</p> <p>The cable joint will be made on board the CLV and would take up to two weeks per joint location. The joint and cables will be buried (as the preference) or protected by external cable protection.</p>	2032 - 2034
Remedial - External Cable Protection	If any part of the cables cannot be buried to the target depth, remedial cable protection may be installed.	2032 - 2035
Post-lay Survey	Geophysical surveys would be undertaken periodically to monitor cable burial and the status of external cable protection after cable laying, jointing and remedial operations.	2032 - 2035
Post-Burial Survey	Geophysical and cable tracker survey would be undertaken to confirm seabed depth can cable depth of lowering.	2035

5.C.3. Relevant Legislation and Regulations

- 5.C.3.1. In addition to the Project specific conditions that will be laid out in the consents, the EPC Contractor (and their sub-contractors) are responsible for identifying and complying with all relevant UK legislation in place at the time of the activities occurring.
- 5.C.3.2. **Table 5.C-5** below outlines the relevant legislation and guidance the English Offshore Scheme is to adhere to throughout the construction of the English Offshore Scheme. The EPC Contractor will be responsible for ensuring this is updated throughout the Project. Reference should also be made to **Volume 1, Part 1, Chapter 2: Regulatory and Policy Overview** and **Volume 2, Part 1, Appendix 2.A: Regulatory and Planning Context**.

Table 5.C-5 Legislation and Guidance relevant to the English Offshore Scheme

Legislation / Guidance	Jurisdiction	Requirement
Legislation		
International Convention for the Safety of Life at Sea (SOLAS) (1974)	International	The International Convention for the Safety of Life at Sea (SOLAS) is an international maritime treaty which sets out minimum safety standards in the construction, equipment and operation of merchant ships. Generally regarded as the most important of all international treaties concerning the safety of merchant ships. The International Maritime Organization (IMO) convention requires signatory flag states to ensure that ships flagged by them comply with at least these standards. SOLAS in its successive forms is generally regarded as the most important of all international treaties concerning the safety of merchant ships.
Convention on the International Regulations for Preventing Collisions at Sea (COLREGs)	International	The COLREGs was designed to update and replace the Collision Regulations of 1960 which were adopted at the same time as the 1960 SOLAS (Safety of Lives at Sea) Convention. Provides best practice and regulations regarding shipping speed, maritime rights of way and signalling to avoid collisions among shipping and offshore developments. These regulations also recognise shipping traffic separation schemes (Rule 10) and gives guidance on behaviour of vessels in or near traffic separation schemes. COLREGS are implemented in the UK via the Merchant Shipping Notices (MSN).
Standards of Training, Certification and Watchkeeping for Seafarers (STCW) 1978	International	Establishes minimum standards requirements for training, certification and watchkeeping.
International Convention for the Prevention of Pollution from Ships (MARPOL)	International	<p>MARPOL is the main international convention covering prevention of pollution of the marine environment by ships from operational or accidental causes. The convention contains several annexes, those relevant to the Marine Scheme include:</p> <ul style="list-style-type: none"> ● Annex I: Prevention of Pollution by Oil; ● Annex IV: Prevention of Pollution by Sewage from Ships; ● Annex V: Prevention of Pollution by Garbage from Ships; and ● Annex VI: Prevention of Air Pollution from Ships.

Legislation / Guidance	Jurisdiction	Requirement
		In accordance with MARPOL requirements, ships will be equipped with waste disposal facilities on board, the discharging of contaminants will not be permitted within 12 Nautical Miles (NM) of the coast, and a Shipboard Oil Pollution Emergency Plan (SOPEP) will be in place for all vessels. Ships will have International Air Pollution Prevention (IAPP) certificates.
International Convention for the Control and Management of Ships' Ballast Water and Sediments	International	The Ballast Water Management (BWM) Convention, adopted in 2004, aims to prevent the spread of harmful aquatic organisms from one region to another, by establishing standards and procedures for the management and control of ships' ballast water and sediments according to ship specific ballast water management plans.
Convention for the Protection of the Marine Environment of the North East Atlantic (the 'OSPAR' convention) adopted in 1992	International	OSPAR is the mechanism by which 15 Governments and the European Union (EU) cooperate to protect the marine environment of the North-East Atlantic.
United Nations Convention on the Law of the Sea (UNCLOS)	International	UNCLOS is considered the 'constitution of the oceans' and represents the result of an unprecedented, and so far, never replicated, effort at codification and progressive development of international law.
Merchant Shipping (Oil Pollution Preparedness, Response and Cooperation Convention) Regulations (1998)	International	Parties to the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC) are required to establish measures for dealing with pollution incidents, either nationally or in co-operation with other countries. Ships are required to carry a Shipboard Oil Pollution Emergency Plan (SOPEP). Operators of offshore units under the jurisdiction of Parties are also required to have oil pollution emergency plans or similar arrangements which must be co-ordinated with national systems for responding promptly and effectively to oil pollution incidents. Ships are required to report incidents of pollution to coastal authorities, and the convention details the actions that are then to be taken. The Convention calls for the establishment of stockpiles of oil spill combating equipment, the holding of oil spill combating exercises and the development of detailed plans for dealing with pollution incidents. Parties to the convention are required to provide assistance to others in the event of

Legislation / Guidance	Jurisdiction	Requirement
Merchant Shipping (Prevention of Pollution by Sewage and Garbage from Ships) Regulations (2008) (as amended)	International	a pollution emergency and provision is made for the reimbursement of any assistance provided.
The World Heritage Convention (1972)	International	The Convention defines the concepts of nature conservation and the preservation of cultural properties, recognising the way in which people interact with nature and the need for balance between nature and culture. Signatories are required to preserve World Heritage Sites defined by the Convention and to identify and preserve national heritage through suitable planning programmes and measures.
Submarine Telegraph Act (1885)	UK	The Act applies to cables in the United Kingdom (UK) waters and was most recently updated by the Merchant Shipping Act 1995. This Act is designed to protect cables by making it an offence to damage a cable and restricting vessels and fishing activities within certain distances of cables.
Marine and Coastal Access Act 2009 (MCAA 2009)	UK	Applicable in the section of the Marine Scheme in English Waters. Under Part 4 of these regulations, a Marine Licence is required for the installation of a subsea cable and cable protection, removal and some other supporting and maintenance works within 12 NM.
The Water Environment (Water Framework Directive) (England and Wales) Regulations 2017	England	The Water Framework Directive (WFD) (England and Wales)) Regulations (2017) transposes the EU Water Framework Directive (2000/60/EC) into UK legislation as retained law from the European Union. The WFD details the designation, monitoring and management of water resources within England to preserve ecosystem services from potential physical degradation from proposed projects. The WFD applies to inland, transitional and coastal surface waters as well as groundwaters. Coastal surface waters are defined as waters out to one NM in England.

Legislation / Guidance	Jurisdiction	Requirement
The Conservation of Habitats and Species Regulations 2017	England (inside 12 NM limit)	Applicable to the English Offshore Scheme in English Waters within 12 NM. These regulations transpose the EU Habitats Directive (92/43/EEC) and EU Birds Directive (2009/147/EC). It aims to implement species and associated habitat protections from proposed developments in the regulatory jurisdiction.
The Conservation of Offshore Marine Habitats and Species Regulations 2017	UK (outside 12 NM limit)	Applicable to the English Offshore Scheme in English Waters outside 12 NM. These regulations transpose the EU Habitats Directive (92/43/EEC) and EU Birds Directive (2009/147/EC) and protect biodiversity in UK offshore waters.
Section 41 of the Natural Environment and Rural Communities (NERC) Act 2006	UK	The Act requires competent authorities to have due regard for protecting and enhancing species and habitats when making public decisions. Section 41 refers to a published list of habitats and species which are of principal importance for the conservation of biodiversity in England. There are 11 sensitive subtidal habitats listed under this act; five of which are found within the wider region and could potentially be encountered. Several intertidal and marine birds are included in the list. European otter, 16 species of cetacean and common / harbour seal are included on the list.
The Wildlife and Countryside Act 1981	UK	The Wildlife and Countryside Act transposes requirements from the Bern Convention and Birds Directive for the UK. It is the primary UK legislation for the protection of animals, plants and associated habitats within the UK including on UK coastlines. It affords strict protection for species listed under Schedule 5 of the Act.
Conservation of Seals Act 1970 (as amended)	UK	This Act provides specific regulations for both harbour seals (<i>Phoca vitulina</i>) and grey seals (<i>Halichoerus grypus</i>), ensuring their welfare and regulating activities that may harm them. Licensing conditions ensure that any authorised actions involving seals are justified and do not negatively impact seal populations in the long term.
The Marine Strategy Regulations (2010)	UK	The Marine Strategy Regulations (2010) transposes the Marine Strategy Framework Directive (2008/56/EC) into UK legislation as retained law from the European Union.

Legislation / Guidance	Jurisdiction	Requirement
The Infrastructure Planning (Environmental Impact Assessment) Regulations 2017	UK	This Act transposes EU Directive 2011/92/EU (the EIA Directive) into UK law for Nationally Significant Infrastructure Projects (NSIPs), ensuring environmental safeguards while potentially streamlining the process.
European Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008	UK	Commonly referred to as the Marine Strategy Framework Directive, the full title of this directive is “European Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy”. This Directive sets out a framework within which Member States must take the necessary measures to achieve or maintain good environmental status in the marine environment by the year 2020 at the latest. Since leaving the EU, the existing UK-wide framework has been maintained to allow for consistent marine environmental monitoring and standards across the UK.
Environment Act (2021)	UK	The Environment Act (2021) sets clear statutory targets for the recovery of the natural world in four priority areas: air quality, biodiversity, water and waste, and includes the introduction of Biodiversity Net Gain (BNG).
Protection of Wrecks Act (1973)	UK	The Protection of Wrecks Act 1973 was enacted to safeguard wreck sites in United Kingdom (UK) territorial waters that are of historical, archaeological, or artistic importance, or pose a danger to navigation or public safety. The Act is divided into two key sections; Section 1 – Protection of sites of historic wrecks ¹ and Section 2 – Prohibition on approaching dangerous wrecks ² . The Act provides a legal mechanism for managing and preserving wreck sites <i>in situ</i> in alignment with international heritage principles (e.g., the United Nations Convention on the Law of the Sea (1982) and UNESCO Convention on the Protection of Underwater Cultural Heritage (2001)).

¹ Section 1 of the Protection of Wrecks Act 1973 outlines the definition of sites of historic wrecks, conditions for the application of the Act, authorisation for activities within protected sites and activities which breach protections.

² Section 2 of the Protection of Wrecks Act 1973 outlines the definition of dangerous wrecks and associated prohibited areas, conditions and activities which breach protections and exemptions.

Legislation / Guidance	Jurisdiction	Requirement
Ancient Monuments and Archaeological Areas Act (1979)	UK	Enshrines the protection and preservation of remains with high archaeological or historical interest. Operations or activities with the potential to disturb or damage the remains within the boundaries of the protected area may be permitted following the granting of Scheduled Monument Consent from the Secretary of State but any unlicensed operations that may disturb the site are illegal.
Protection of Military Remains Act (1986)	UK	Provides protection for the wreckage of military aircraft and certain military wrecks. Designations can be either as a Controlled Site or Protected Place where access may be permitted but any operations that may disturb the site are illegal, unless licenced by the Ministry of Defence (MoD). All military aircraft are automatically protected under this legislation; however, vessels must be designated individually.
Merchant Shipping Act (1995)	UK	The Act stipulates that the 'Receiver of Wreck' administers and is responsible for processing incoming reports of wreck and cargo.
Guidance		
JNCC 2017 guidelines for minimising the risk of injury to marine mammals from geophysical surveys	UK	Measures to minimise injury to cetaceans and seals from geophysical surveys.
Draft 2025 JNCC guidelines for minimising the risk of injury to marine mammals from geophysical surveys	UK	Set out the industry standard approach to mitigation for geophysical surveys. The mitigation measures within this document will replace those published in the 2017 version once finalised.
JNCC 2025 guidelines for minimising the risk of injury to marine mammals from unexploded ordnance (UXO) clearance in the marine environment	UK	Sets out the industry approach to mitigation for UXO clearance, updated from the 2017 guidance
The Basking Shark Code of Conduct	UK	Recommendations to minimise the risk of injury or disturbance to basking sharks.

Legislation / Guidance	Jurisdiction	Requirement
IMO guidelines for the control and management of ships' biofouling to minimise the transfer of invasive aquatic species (Biofouling Guidelines) (resolution MEPC.207(62))	International	Provides a globally consistent approach to the management of biofouling, which is the accumulation of various aquatic organisms on ships' hulls. These guidelines were adopted by the Marine Environment Protection Committee (MEPC) at its sixty-second session in July 2011.
Fishing Liaison with Offshore Wind and Wet Renewables Group (FLOWW) Best Practice Guidance for Fisheries Liaison	UK	Guidance and recommendations to promote co-existence between the marine renewable energy industry and the fishing industry, covering topics such as communication, engagement and evidence-based mitigation.

5.C.4. Implementation of the CEMP

Roles and Responsibilities

5.C.4.1. The roles and responsibilities pertinent to the implementation of the key activities are outlined and described in **Table 5.C-6** and will be confirmed in further detail within the CEMP.

Table 5.C-6 Roles and Responsibilities for the implementation of the CEMP

Organisation	Responsibilities	Contact Details
The Applicant	<p>Licence Holder</p> <ul style="list-style-type: none"> The Licence holder is to appoint a suitably competent EPC Contractor to undertake the work, ensure and monitor compliance with licence conditions and submit notifications. 	TBC
EPC Contractor (TBC)	<ul style="list-style-type: none"> Responsible for the manufacture, transport and installation of the offshore power cables; Responsible for discharging environmental consent obligations on behalf of the Licence Holder (where required); Responsible for monitoring the environmental performance of all sub-contractors and ensuring that they remain compliant with the CEMP; 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 	TBC

Organisation	Responsibilities	Contact Details
	<p>practice or guidance are fully investigated and reported, including reporting of spills; and</p> <ul style="list-style-type: none"> Responsible for ensuring that the CEMP is kept up-to-date and available for dissemination to all parties as necessary and appropriate. 	
Sub-contractors (TBC)	To comply with the requirements of the EPC contractors Environmental Management Plans	TBC

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 Project. The RAMS will also refer to the relevant elements of various guidance that will be implemented as part of their management controls.

Contact details

5.C.4.3. Contact details relevant to the key personnel throughout construction will be provided in **Table 5.C-7** within the CEMP.

Table 5.C-7 Contact details for Construction

Name	Role	Company	Phone number	Email address	Office location
The Applicant Contacts					
EPC Contractor					
Subcontractor					

Environmental Training and Awareness

5.C.4.4. The EPC Contractor will be responsible for developing and implementing environmental training relevant to the CEMP. Several methods for training and awareness will be proposed in the CEMP to ensure that all staff have the required skills and knowledge to perform their tasks. Those methods will be outlined within **Table 5.C-8** in the CEMP and will align with the most up to date industry best practice.

5.C.4.5. Environmental training will be conducted by a suitably qualified person. The EPC Contractor will maintain training records and provide copies to the Project, as required. The EPC Contractor and subcontractors will be responsible for identifying specific

training needs and ensuring appropriate training is provided, those details of relevant HSE training plans will be included within the Final CEMP.

- 5.C.4.6. In addition, environmental awareness will be promoted using environmental notice board(s) / posters on vessels displaying information relating to environmental risks and mitigations and environmental good practice.

Table 5.C-8 Methods for environmental training and awareness

Method	Description
Inductions	All contractors and subcontractors will undertake induction training prior to starting work. During the induction, the environmental requirements of this CEMP will be explained and the aspects applicable to staff will be made clear to ensure environmental responsibilities are well understood.
Toolbox Talks	Toolbox talks will be conducted to provide specific information on risks and mitigations relevant to the new activity they are involved in and will offer an opportunity for continuous training and reinforcement of environmental awareness. This will include a variety of topics but will include training on waste management, pollution prevention, fuel handling, emergency response procedures, and environmental mitigations and control measures. Toolbox talks will also be conducted if any elements of this CEMP are updated or if any environmental issues or concerns arise on-site.
Lessons Learned	Lessons learned sessions will be held and incorporated into Toolbox talks as needed. Should this process, or any other, generate environmental information worth sharing, the project team shall inform the MMO and the wider industry as necessary.

5.C.5. Communication and Reporting Procedures

Internal Communications

- 5.C.5.1. Internal communications between the Applicant, EPC Contractor and subcontractors will occur through a variety of appropriate channels, such as daily meetings, site briefings and daily progress emails. Daily Progress Reports (DPRs) will be issued to the Project to summarise the activities that took place over the previous 24 hours and any environmental incidents or observations and provide a lookahead of operations planned for the following 24 hours.
- 5.C.5.2. 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.
- 5.C.5.3. Site inductions should be held prior to commencement of any activities associated with the English Offshore Scheme to ensure that all personnel involved are aware of the environmental responsibility and are competent to carry out the work. The site inductions will include all safety protocols and location of emergency equipment. Site

inductions will typically be given by the Quality, Health, Safety and Environment department.

- 5.C.5.4. Environmental requirements, control measures and environmental mitigation shall be explained to all contractors and subcontractors involved in the English Offshore Scheme via site inductions, toolbox talks, on-going training, briefings and notifications. Records shall be made to demonstrate competence and training of contractors; this includes checking qualifications and sign off sheets for tool box talks and other awareness programmes. Records shall be managed in line with data protection legislation.
- 5.C.5.5. 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;
 - Biosecurity management;
 - Marine mammal mitigation protocols;
 - Dropped objects;
 - The significant environmental aspects and potential impacts of the work;
 - How to submit environmental near misses and incidents;
 - Environmental site rules and regulations;
 - Red throated diver protocols; and
 - Archaeological compliance and reporting.

External Communications

- 5.C.5.6. The Project will liaise with the MMO if required and other relevant external stakeholders on matters relating to environmental management. External communications, notifications and reporting will be carried out in accordance with the DML consent conditions.
- 5.C.5.7. Proposed routine reports, notifications and communications to external stakeholders will be provided within the CEMP in **Table 5.C-9** below.

Table 5.C-9 Proposed routine reports, notifications and communications to Stakeholders

External communication	Relevant stakeholders	Frequency	Responsibility
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- 5.C.5.8. In addition to routine communications to external stakeholders, the Project and the EPC Contractor is committed to implementing a proactive and proportionate approach to responding to environmental incidents, and timely reporting will be key to achieving this. All staff will report any environmental concerns, issues or near misses immediately, and this information will be reviewed, investigated and escalated, where

required. The Project will be responsible for communicating environmental incidents to the regulator and relevant statutory consultees, unless otherwise agreed with the EPC Contractor.

5.C.5.9. Methods of reporting on environmental incidents or change in construction methods are detailed below in **Table 5.C-10** and will be expanded on in the Final CEMP.

Table 5.C-10 Environmental Communications Protocol

Issue	Communications Requirements
Change in construction method	<ul style="list-style-type: none"> ● EPC Contractor to advise The Project as soon as made aware. ● The Project to advise EPC Contractor whether changes should be considered material and appropriate discussions be undertaken with Licensing Authority.
Change to agreed mitigation	<ul style="list-style-type: none"> ● EPC Contractor to advise The Project as soon as made aware. ● The Project to advise EPC Contractor whether changes should be considered material and appropriate discussions be undertaken with Licensing Authority. The Project to liaise with regulators and statutory consultees as appropriate.
Major environmental non-compliance	<ul style="list-style-type: none"> ● EPC Contractor to advise The Project as soon as made aware. ● EPC Contractor to advise The Project (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 EPC Contractor should not delay in implementing appropriate and agreed mitigation measures and reporting the incident directly to the appropriate body. ● EPC Contractor to record all environmental non-compliances in the non-conformance register.
Minor environmental non-compliance	<ul style="list-style-type: none"> ● EPC Contractor to advise the Project as soon as aware of all incidents on non-compliance, and subsequent actions taken. ● EPC Contractor to investigate all non-compliance incidents. ● EPC Contractor to inform the Project of all non-compliance incidents within 30 minutes. ● EPC Contractor to record all environmental non-compliances in the non-conformance register.
Waste disposal	<ul style="list-style-type: none"> ● EPC Contractor to provide own Waste Management Plan to form part of the English Offshore Scheme CEMP.
Stakeholder communication	<ul style="list-style-type: none"> ● Consents and environmental related communication to be managed by either EPC Contractor or the Project as appropriate. Contractor(s) should not engage directly with statutory stakeholders on matters concerning licenses, consents or permissions without prior agreement from the Project (except in cases of emergency).

Availability and Update of Documents

- 5.C.5.10. The CEMP will be developed and submitted to the MMO within the specified timescales within the DCO / DML in consultation with relevant stakeholders for review and approval.
- 5.C.5.11. It will also be reviewed quarterly during construction of the English Offshore Scheme. These reviews will focus on:
- Changes in roles and responsibilities of the 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.
- 5.C.5.12. 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.

5.C.6. Environmental Monitoring and Compliance

Monitoring and Compliance

- 5.C.6.1. The Applicant will assess the environmental competence and suitability of the EPC Contractor and any subcontractors ahead of construction. The EPC Contractor and any Subcontractors will ensure that they have adequate environmental management resources and procedures in place for the duration of the construction activities that they are contracted to undertake.
- 5.C.6.2. To ensure adherence to the CEMP and consent conditions, all contractors and subcontractors shall monitor and record environmental impacts related to their involvement during construction including but not be 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.
- 5.C.6.3. An Environmental Mitigations and Commitments Register will be developed containing the DCO / DML consent conditions. The commitments register will serve as an audit trail of compliance throughout construction. Each and any contractor(s) shall be responsible for appointing their own company Environmental Manager who shall manage co-ordinate and maintain compliance with the CEMP and commitment register throughout their involvement in the Project.
- 5.C.6.4. Monitoring construction activities will occur throughout construction to ensure compliance with the CEMP and consent conditions where the EPC Contractor (and their sub-contractors) shall document the results of compliance with the relevant environmental standards via DPRs and shall provide any supporting documentation on a regular basis (e.g., monthly).

- 5.C.6.5. Several audits will be carried out at various stages of construction, the timelines of which will be determined within the CEMP. Following each audit, a report will be developed and issued for approval. Any non-compliance / incident will be subject to a risk assessment to identify appropriate remedial measures and will be reported to relevant stakeholders as required. All remedial measures will be clearly communicated to the personnel responsible for their implementation via inductions and toolbox talks.
- 5.C.6.6. The Applicant Client Representative onboard the vessel will monitor onboard activities to ensure compliance with the CEMP. The CEMP will also be reviewed after each construction phase and any lessons learned/actions identified during the review will be carried forward to an update.

Environmental Sensitivities

- 5.C.6.7. Details of the environmental characteristics of the English Offshore Scheme and environmental sensitivities are further detailed in each of the technical chapters in **Volume 1, Part 3, Chapters 17 - 25**.
- 5.C.6.8. The CEMP will set out the relevant controls and procedures to be adopted to mitigate the environmental impacts associated with the English Offshore Scheme. These measures will be specific to the final design of the English Offshore Scheme and subject to further stakeholder engagement.
- 5.C.6.9. The CEMP will set out measures to avoid, reduce or mitigate environmental impacts as appropriate.

5.C.7. Hazard and Risk Management

Hazard Management and Risk Identification

- 5.C.7.1. All contractors undertaking works for the English Offshore Scheme will be required to produce aspects and impacts registers related to the works for the CEMP. Such registers will include details of:
- Aspects associated with (but not limited to) emissions to air and water; 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.

Dropped Object Procedure

- 5.C.7.2. If the EPC Contractor or subcontractor(s) becomes aware of a potential dropped object, this should be logged as soon as possible and communicated to the Project. The dropped object will be retrieved where reasonably practicable. If retrieval is not possible and the object is regarded as a hazard to safe navigation, the HM Coastguard will be notified via telephone as soon as possible. The dropped object will be recorded and reported to the MMO using the Dropped Object Procedure Form within 24 hours of the EPC Contractor or subcontractor(s) becoming aware of the incident.
- 5.C.7.3. The CEMP will include all details relating to procedures for Dropped Objects and the Dropped Object Procedure Form.

5.C.8. Environmental Commitments and Mitigations

Control and Management Measures

5.C.8.1. Control and management measures have been identified that would reduce impacts from the English Offshore Scheme on the environment. These are generally measures that would normally be implemented as part of construction but also include several topic-specific good practice measures. They also include effective measures that have typically been employed on other similar projects. The EPC Contractor would be expected to demonstrate compliance with these measures during construction.

- Measures listed in **Table 5.C-11** have been assigned references. These align with the references provided in each aspect chapter included in **Volume 1, Part 3: English Offshore Scheme**. Any references identified with the prefix OMT (for example OMT01) include measures which may also be listed in other topics considered as part of this PEIR. The (C) denotes that the measure is a control and management measure and has been used to distinguish between similarly referenced design measures as part of **Volume 2, Part 1, Appendix 5.A: Outline Register of Design Measures**.

Table 5.C-11 Control and Management Measures

Ref	Description of Measure
Multiple Topic Commitments	
OMT01 (C)	Drilling fluids required for trenchless operations would be carefully managed to minimise the risk of breakouts into the marine environment. This would include the use of biodegradable drilling fluids (pose little or no risk (PLONOR) substances) where practicable.
OMT02 (C)	As-built locations of cable and external protection will be supplied to the United Kingdom Hydrographic Office (UKHO) (Admiralty), The Crown Estate and Kingfisher (KIS-ORCA).
OMT03 (C)	All oil, fuel and chemical spills would be reported to the Marine Management Organisation (MMO) Marine Pollution response team in accordance with the MPCP.
OMT04 (C)	Chemicals will be chosen from the list of chemicals approved under the Offshore Chemical Notification Scheme (OCNS).
OMT05 (C)	Guard vessel(s), using Radio Detection and Ranging (RADAR) with Automatic RADAR Plotting Aid (ARPA) to monitor vessel activity and predict possible interactions, will be employed to work alongside the installation vessel(s) during cable installation works and to protect any temporary cable exposures during installation.
OMT06 (C)	In accordance with the UK Government (2025) guidance “ <i>Supporting minimising environmental impacts from unexploded ordnance clearance</i> ” the UXO mitigation hierarchy would be followed for any targets identified during the UXO survey and confirmed as UXO.
OMT07 (C)	The Applicant would apply for a separate Marine Licence and European Protected Species Licence for UXO clearance.

Ref	Description of Measure
OMT08 (C)	All project vessels must comply with the International Regulations for Preventing Collisions at Sea (COLREGs) (1972), as amended, particularly with respect to the display of lights, shapes and signals. The masters of other vessels are expected to be familiar with and comply with the COLREGs. Additionally, project vessels would adhere to regulations relating to International Convention for the Prevention of Pollution from Ships (the MARPOL Convention 73 / 78) with the aim of preventing and minimising pollution from ships and the Safety of Life at Sea (SOLAS).
OMT09 (C)	All Project vessels would display appropriate marks and lights and would always broadcast their status on AIS if appropriate.
OMT10 (C)	Relevant information will be communicated to other sea users Notices to Mariners (NtM), Kingfisher Bulletins, Radio Navigation Warnings, Navigational Telex (NAVTEX) and Navigational Areas (NAVAREA) warnings and / or broadcast warnings
OMT11 (C)	For safety purposes, all vessels will be requested to maintain a minimum distance from construction vessels to prevent interactions.
OMT12 (C)	Cut cable end locations and associated weights shall be accurately noted and charted and positions supplied to the UKHO (Admiralty), The Crown Estate, Kingfisher (KIS-ORCA) and the Fisheries Liaison Officer (FLO) at the earliest opportunity for onward communication.
OMT13 (C)	Micro-routing within the English Offshore Scheme draft Order Limits will be deployed to avoid sensitive seabed features where possible.
OMT14 (C)	Where potential interaction between the English Offshore Scheme and other infrastructure, projects or marine activities are identified, owners / operators / licence holders will be consulted and standard legal agreements (such as crossing or proximity agreements) or SIMOPs procedures will be developed prior to the commencement of operations.
Coastal and Marine Physical Processes	
No control and management measures specific to this topic have been identified at this stage.	
Intertidal and Subtidal Benthic Ecology	
No control and management measures specific to this topic have been identified at this stage.	
Fish and Shellfish	
No control and management measures specific to this topic have been identified at this stage.	
Intertidal and Offshore Ornithology	
OO01 (C)	Existing shipping lanes would be utilised for vessel transiting routes to avoid additional disturbance, where practicable.
OO01 (C)	Vessel operators would be made aware of the importance and sensitivity of the species to disturbance. Vessels will avoid rafting birds and areas with high densities of birds, where practicable.

Ref	Description of Measure
OO02 (C)	Artificial lighting on vessels would be directional and only used when necessary, noting that health and safety requirements will need to be met for safe working practices.
Marine Mammals and Marine Reptiles	
MM01 (C)	All vessels (exceeding 20 m) shall not exceed 14 knots during construction operations within the draft Order Limits to protect marine mammals from ship strikes.
MM02 (C)	Sub-bottom profiling shall comply with JNCC guidelines for minimising the risk of disturbance to marine mammals.
Shipping and Navigation	
SNV01 (C)	Project vessel compliance with MGN 661 Navigation - safe and responsible anchoring and fishing practices.
SNV02 (C)	The presence of an established Vessel Traffic Service (VTS) in the area, and the advance notification of planned operations to VTS managers. A communication strategy with ABP Humber will be developed for the Project including communication protocols with VTS.
SNV03 (C)	Notification to Regular Runners (RRs) including ferry operators.
SNV04 (C)	Establishment of Operations Weather Envelope Limits. The Project will establish a critical minimum operational envelope for relevant activities with regards to weather conditions and visibility, and will monitor weather conditions during construction phase
SNV05 (C)	Procedures would be in place to minimise disruption near high density shipping areas. e.g., avoidance of anchoring near busy areas, passage planning of installation vessels, emergency response plan.
SNV06 (C)	Temporary aids to navigation may be used to guide vessels around areas of installation activity if agreed with Trinity House
SNV07 (C)	Pollution events as the result of a collision would be managed through the Emergency Response Plan, Marine Pollution Contingency Plan and specifically the Shipboard Oil Pollution Emergency Plan (SOPEP).
SNV08 (C)	Cable jointing operations to be planned away from high shipping activity where possible.
Commercial Fisheries	
CF01 (C)	A Fisheries Liaison Officer (FLO) and / or fisheries working group(s), will be maintained throughout installation to ensure project information is effectively disseminated, dialogue is maintained with the commercial fishing industry and access to home ports is maintained during the main fishing season. Details of the FLO will be included in the Fisheries Liaison and Coexistence Plan (FLCP). An outline FLCP has been prepared, which will be updated to the FLCP post-consent (Volume 2, Part 3, Appendix 23.B: Fisheries Liaison and Coexistence Plan).
CF02 (C)	If cable exposures are identified during routine surveys, the location of these will be shared with fisheries stakeholders and where necessary, additional

Ref	Description of Measure
	temporary measures put in place (e.g., marker buoys, use of guard vessels, etc), until a repair or remediation can be implemented.
CF03 (C)	A procedure for the claim of loss of / or damage to fishing gear will be developed and details included in the Fisheries Liaison and Coexistence Plan post-consent.
CF04 (C)	During cable route clearance, specific activities will be completed to remove items from the seabed.
CF05 (C)	Where the English Offshore Scheme encounters Out of Service (OOS) cables, if deemed necessary, those OOS cables will be cut and their ends made safe with weights. Any cut cable lengths will be retrieved to the deck of the vessel for disposal onshore via conventional onshore waste channels. Any cut cable end locations and associated weights shall be accurately noted and charted and positions given to the FLO at the earliest opportunity for onward communication to the fishing industry.
CF06 (C)	Timings of any temporary areas of exclusion from fishing grounds will be clearly communicated via a notice to mariners and communicated by the FLO directly to local fishing associations and known fishers as required.
CF07 (C)	During cable route clearance, specific activities will be completed to remove items from the seabed. In the event that abandoned, lost or discarded fishing gear ('ALDFG') is encountered, it may be necessary in certain circumstances to bring ALDFG onto the vessel deck. In these instances, marked ALDFG would be returned to the MMO / local Inshore Fisheries and Conservation Authority (IFCA) for onward retrieval by the owner of the marked gear, in line with existing best practice. Not all gear (particularly 'active' gear) is marked; if necessary to bring onto the vessel deck, unmarked gear would be disposed of via conventional onshore waste channels.
Other Marine Users	
OMU01 (C)	Client Representation onboard Project vessels, ensuring compliance with crossing design and communications with Asset Owners.
OMU02 (C)	Unexploded Ordnance (UXO) survey and removal and / or charting as relevant and appropriate of confirmed UXO targets, highlighting known risks to other marine users.
Marine Archaeology	
MA01 (C)	Written Scheme of Investigation (WSI): implementation of a protocol for avoiding, mitigating and managing finds of archaeological interest, following the guidance for the Protocol for Archaeological Discoveries (PAD).
MA02 (C)	Archaeological input into specifications for and archaeological analysis of any further pre-construction surveys, including (but not limited to) unexploded ordnance (UXO), Remotely Operated Vehicle (ROV), diver, geophysical and geotechnical surveys.
MA03 (C)	Mitigation of unavoidable direct impacts on known sites of archaeological significance. Options include i) preservation by record; ii) stabilisation; and iii) detailed analysis and safeguarding of otherwise comparable sites elsewhere.

Ref	Description of Measure
MA04 (C)	Archaeologists to be consulted in the preparation of site preparation activities or other pre-construction operations and, if appropriate, to carry out archaeological monitoring of such work.
MA05 (C)	Implementation of Archaeological Exclusion Zones (AEZs) or Temporary Archaeological Exclusion Zones (TAEZs) around identified known or potential Marine Archaeology receptors.
MA06 (C)	Implementation of a protocol for recording finds of archaeological interest, following the guidance for the Protocol for Archaeological Discoveries (PAD).
MA07 (C)	Obtaining geotechnical cores for archaeological review. Implementation of a staged process of geoarchaeological works, as necessary.
MA08 (C)	Operational awareness of the location of geophysical anomalies identified as having a low archaeological potential. Reporting through the PAD will be undertaken should material of potential archaeological interest be encountered.

- 5.C.8.2. Full details of all commitments and associated mitigations will be provided with the ES as part of an Environmental Mitigation and Commitment Register. The CEMP will detail mitigation and other measures included in the various management plans as listed in Sections Structure of this Outline CEMP and Linkages with Other Management Plans above.
- 5.C.8.3. The EPC Contractor will be responsible for maintaining and implementing all mitigation measures.

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