Bellrock Offshore Wind Farm

Wind Farm Development Area

Volume V

Marine Pollution Contingency Plan

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Glossary of Terminology

Term	Definition
Applicant	Bellrock Offshore Wind Farm Limited, the legal entity submitting Section 36 Consent and Marine Licence applications for the Bellrock Wind Farm Development Area.
Bellrock Offshore Wind Farm (Bellrock Project)	An offshore wind farm capable of exporting up to 1.8 GW of renewable energy to the National Electricity Transmission System. The Wind Farm Development Area is located 120 km east of Stonehaven, and will connect to the National Electricity Transmission System at the proposed SSEN Transmission Hurlie substation, west of Stonehaven in Aberdeenshire. The Bellrock Offshore Wind Farm comprises of the following Development Areas: ▪ Wind Farm Development Area; ▪ Offshore Transmission Development Area; and ▪ Onshore Transmission Development Area.
Cable protection	Protective measure to minimise the effects of scour and hazards along the inter-array cables, and protecting these cables at infrastructure crossing points.
Commencement of construction *(in an offshore context)*	Commencement of construction to install the Wind Farm Infrastructure as authorised by the Wind Farm Development Area Section 36 Consent and Marine Licence (excluding site preparation works), being the earlier of: ▪ Intrusive pre-installation surveys; ▪ Placement on or installation in the seabed of anchors and associated scour protection, and mooring lines; ▪ Trench excavation for inter-array cables; or ▪ Trenching for, or laying of inter-array cables on or in the seabed.
Commercial Operation Date	The date that the site is fully transferred to the operations team which is likely to be the date of the taking over certificate of the last wind turbine generator to be installed.

Term	Definition
Construction works *(in an offshore context)*	Works to install the Wind Farm Infrastructure as authorised by the Wind Farm Development Area Section 36 Consent/Marine Licence, such as: ▪ Site preparation works undertaken after commencement of construction; ▪ Pre-installation surveys (intrusive and/or non-intrusive); ▪ Placement on or installation in the seabed of anchors and associated scour protection, and mooring lines, and associated scour protection; ▪ Towing or transportation of the floating offshore unit to the Wind Farm Development Area from a port or wet storage facility; ▪ Floating offshore unit installation and commissioning, including hooking-up to the pre-installed mooring system; ▪ Trench excavation for inter-array cables; ▪ Laying of inter-array cables in or on the seabed and, associated cable protection; ▪ Installation of subsea cable hubs, including placing of associated foundation; ▪ Final commissioning following cable connections and snagging; and ▪ Post installation surveys.
Dynamic inter-array cable	The section of inter-array cable between the floating substructure and the seabed, which is designed to accommodate the dynamic movement of the floating substructure.
Excursion limit	The maximum horizontal movement of a floating substructure from its design coordinates.
Floating offshore unit	The combined wind turbine generator and floating substructure.
Floating offshore substation	The combined offshore substation, floating substructure and station keeping system.
Floating substructure	A floating structure which provides buoyancy and, in conjunction with the station keeping system, supports a superstructure (e.g. wind turbine generator or offshore substation), and maintaining its position within the structure's excursion limit.
Inter-array cables	Armoured cable containing electrical and fibre optic cores, which link the wind turbine generators to each other and to the subsea cable hubs and/or the offshore substations and include dynamic inter-array cable and static inter-array cable sections.
Interconnector cable	Armoured cable containing electrical and fibre optic cores which link two or more offshore substations.
National Electricity Transmission System	The high-voltage electricity power transmission network serving Great Britain which receives electricity from generators (such as offshore wind farms) and transmits that electricity to anywhere on the National Electricity Transmission System to satisfy demand.
Offshore export cable	Armoured cable containing electrical and fibre optic cores between the offshore substation(s) and the transition joint bay(s).

Term	Definition
Offshore substation	An offshore platform which houses electrical equipment such as transformers, switchgear, and protection and control systems, enabling the wind farm's renewable electricity to be received via inter-array cables and exported via the offshore export cables.
Offshore Transmission Development Area	The boundary within which the Offshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned (and includes the whole of the Wind Farm Development Area).
Offshore Transmission Infrastructure	Infrastructure located within the Offshore Transmission Development Area including fixed bottom and/or floating offshore substations, offshore reactive compensation station(s) and associated scour protection; interconnector cables and associated cable protection; and offshore export cables and associated cable protection (including activities associated with the Offshore Transmission Infrastructure construction, operation and maintenance, and decommissioning).
Onshore Transmission Development Area	The boundary within which the Onshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned.
Operational life	The expected operational life of the Wind Farm Infrastructure from the Commercial Operation Date to the first floating offshore unit being decommissioned.
ScotWind	A Crown Estate Scotland leasing round for offshore wind projects in which the process enabled developers to apply for seabed rights to plan and build wind farms in Scottish waters.
Scour protection	Protective material positioned around anchors to avoid sediment being eroded as a result of the flow of water.
Site preparation works *(in an offshore context)*	Preparatory activities undertaken within the Wind Farm Development Area prior to the commencement of construction of the Wind Farm Infrastructure, which may comprise (and which may require separate consents): ▪ Geophysical surveys, geotechnical surveys, and non-archaeological/archaeological diver/ remotely operated vehicle surveys; ▪ Seabed preparation including sand wave levelling (if required), slope levelling for gravity based anchors (if selected), boulder clearance, and pre-lay grapnel runs; ▪ Unexploded Ordnance survey and/or clearance; ▪ Debris clearance; and ▪ Out of service cable/pipeline removal.
Static Inter-array cable	The section of inter-array cable that is not designed to move.
Station keeping system	The system (including mooring lines and anchors) used to hold a floating offshore unit within its excursion limit and maintain the intended orientation of the floating offshore unit.
Subsea cable hub	A subsea device, with a gravel pad foundation, which allows the connection of multiple inter-array cables.
Switchgear	Electrical equipment used to control, protect, and isolate electrical circuits and equipment.

Term	Definition
Towing	Transportation of a floating offshore unit or floating substructure between a port, and/or wet storage facility and/or the Wind Farm Development Area.
Wet storage	The temporary storage/anchorage of floating substructures and/or floating offshore units prior to their transportation to the Wind Farm Development Area.
Wind Farm Development Area	The boundary within which the Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned.
Wind Farm Infrastructure	Infrastructure located within the Wind Farm Development Area including wind turbine generators; floating substructures, station keeping systems and associated scour protection; inter-array cables and associated cable protection; subsea cable hubs; and ancillary infrastructure including buoys (including activities associated with the Wind Farm Infrastructure construction, operation and maintenance, and decommissioning).
Wind turbine generator	A wind turbine generator converts wind energy into electrical energy. The main components include rotor assembly (composed of three blades and a hub); nacelle (containing the generator, shaft and gearbox, power electronic converter and transformer); and a tower (containing lifting equipment and switchgear).

Glossary of Abbreviations

Term	Definition
AIS	Automatic Identification System
COLREGs	International Regulations for Preventing Collisions at Sea 1972
COSHH	Control of Substances Hazardous to Health
DCPSO	Duty Counter Pollution and Salvage Officer
ECoW	Environmental Clerk of Works
EIA	Environmental Impact Assessment
EMP	Environmental Management Plan
ERCoP	Emergency Response Cooperation Plan
ERP	Emergency Response Plan
FOU	Floating offshore unit
FSS	Floating substructure
GT	Gross tonne
IFO	Intermediate fuel oil
IMO	International Maritime Organisation
km	Kilometre
km^2	Square kilometre
MARPOL	International Convention for the Prevention of Pollution from Ships 1973/1978
MCA	Maritime and Coastguard Agency
MCC	Marine coordination centre
MCS	Marine coordination system
MD-LOT	Scottish Government's Marine Directorate Licensing Operations Team
MGN	Marine Guidance Note
MGO	Marine gas oil
MPCP	Marine Pollution Contingency Plan
MRCC	Maritime rescue coordination centre
MRC	Marine response centre
NCP	The United Kingdom National Contingency Plan for Responding to Marine Pollution Incidents

Term	Definition
O&M	Operation and maintenance
OfTDA	Offshore Transmission Development Area
POLREP	Pollution report
PPE	Personal protective equipment
PPM	Planned preventative maintenance
QHSE	Quality, health, safety, and environment
RAMS	Risk assessment and method statements
s.36	Section 36 of the Electricity Act 1989
SAR	Search and rescue
SDS	Safety data sheet
SOLAS	International Convention for the Safety of Life at Sea 1974
SOPEP	Shipboard Oil Pollution Emergency Plan
UK	United Kingdom
WFDA	Wind Farm Development Area

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1 Introduction

1.1 Background

1. In 2021, Crown Estate Scotland launched the ScotWind[1] leasing round which released areas of seabed in Scottish waters for new commercial scale offshore wind developments to help Scotland achieve its net-zero emissions target by 2045. In January 2022, Bellrock Offshore Wind Farm Limited (the Applicant[2]) was successfully awarded development rights for an area of seabed, to develop the Bellrock Wind Farm Development Area (WFDA), which forms part of the Bellrock Offshore Wind Farm (the Bellrock Project).

2. The Bellrock Project comprises the following three Development Areas for which separate consents and/or licences will be sought by the Applicant:

- The Bellrock WFDA within which the Bellrock Wind Farm Infrastructure will be constructed, operated and maintained, and decommissioned;
- The Bellrock Offshore Transmission Development Area (OfTDA) within which the Bellrock Offshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned; and
- The Bellrock Onshore Transmission Development Area, within which the Bellrock Onshore Transmission Infrastructure will be constructed, operated and maintained, and decommissioned.

1.2 Purpose of the Plan

3. This Marine Pollution Contingency Plan (MPCP) sets out the measures in place to prevent and respond to marine pollution incidents during the construction and operation and maintenance (O&M) phases of the Bellrock WFDA[3], and supplements the Applicant's overarching Emergency Response Plan (ERP) (Nadara, 2025). This MPCP applies to all Wind Farm Infrastructure and associated marine vessels. A separate MPCP for the Bellrock OfTDA will be prepared and submitted alongside the Bellrock OfTDA consent application.

4. The primary aim of this MPCP is to protect the marine environment whilst safeguarding human health by ensuring a timely and coordinated response to accidental pollution. In line with Marine

[1] The ScotWind leasing round was initiated based on the Sectoral Marine Plan for Offshore Wind Energy (Scottish Government, 2020a), which identified a number of sustainable areas for future commercial-scale offshore wind development, and provided the spatial strategy to support CES's ScotWind leasing round.

[2] The term 'Applicant' is used throughout this plan, reflecting the application stage of the Bellrock WFDA, and is interchangeable with the term 'Developer'.

[3] As decommissioning of the Bellrock WFDA will require a separate Marine Licence, in line MD-LOT's guidance on mitigation and monitoring plans (MD-LOT, 2025), a MPCP for the decommissioning activities will be submitted at the time of the decommissioning Marine Licence application.

Directorate – Licensing Operations Team (MD-LOT) guidance on mitigation and monitoring plans (MD-LOT, 2025), this MPCP has been developed to provide sufficient information at the consent application stage to not require updating and/or further approval prior to commencement of construction. Licence or consent conditions will allow this MPCP to be updated as required throughout the operational life of the Bellrock WFDA as required for (as an example) adaptive management measures.

5. This MPCP focuses on the management of Tier 1 pollution incidents, as defined in **Section 5.1.1**, which can be effectively addressed using internal/on-site resources. While this MPCP does not include detailed procedures for Tier 2 and Tier 3 incidents, it sets out escalation arrangements whereby, should an incident exceed the Tier 1 capacity, the Maritime and Coastguard Agency (MCA) may assume overall responsibility and implement the United Kingdom (UK) National Contingency Plan (NCP) for Responding to Marine Pollution Incidents (MCA, 2024).

6. In the event that a pollution incident occurs as part of a wider emergency, such as a fire within, or structural failure of, Wind Farm Infrastructure, this MPCP should be read in conjunction with the Bellrock WFDA Emergency Response Cooperation Plan (ERCoP), which outlines procedures for managing complex or multi-hazard incidents in accordance with Annex 5 of Marine Guidance Note (MGN) 654 (MCA, 2021).

7. Although the likelihood of a pollution incident is low, maintaining a robust MPCP is recognised as best practice within the offshore renewables industry.

1.3 Consultation Undertaken in Preparing this MPCP

8. The MPCP guidance for offshore renewable energy projects (MD-LOT, 2025) recommends pre-application consultation with the MCA regarding the content of MPCPs to ensure alignment with expectations. The Applicant engaged with the MCA to clarify consultation requirements during the pre-application stage; however, the MCA advised that they did not wish to be consulted during the pre-application stage and will instead provide feedback as required by MD-LOT during the consent determination and post-consent stages.

1.4 Project Description

9. The Bellrock WFDA is located 120 kilometres (km) east of Stonehaven (116 km from Peterhead), in Aberdeenshire, Scotland, and covers an area of 280 square kilometres (km^2), as shown in **Figure A.1 (Appendix A: Figures)**.

10. The Wind Farm Infrastructure comprises:

- Up to 132 wind turbine generators with floating substructures (FSS) (together termed as an floating offshore unit (FOU));
- Station keeping systems for each FSS, including mooring lines, anchoring systems and ancillary elements;

- Scour protection for FSS anchoring points;
- Approximately 300 km of inter-array cables (IACs) comprising static and dynamic sections of IACs linking the individual FOUs to subsea cable hub(s) or to the offshore substations[4];
- Associated cable protection as required;
- Up to 18 subsea cable hubs; and
- Ancillary elements including buoys.

1.5 Future Updates to this MPCP

11. This MPCP has been developed to support the Section 36 (s.36) Consent application and the Marine Licence application for the Bellrock WFDA and is intended to be a complete document at the time of submission. It has been prepared in accordance with regulatory expectations (**Section 2**) (MD-LOT, 2025) and does not require further approval prior to commencement of construction. However, to support adaptive management measures and to reflect evolving best practices updates to this MPCP may be required during the operational life of the infrastructure. Provisions for such updates will be made under the conditions of the s.36 Consent and Marine Licence.

1.5.1 Consent Conditions

12. At the point of submission of this MPCP, in support of the s.36 Consent and Marine Licence applications for the Bellrock WFDA, the specific consent conditions will not yet have been drafted. However, it is anticipated that the s.36 Consent and Marine Licence for the Bellrock WFDA will include conditions requiring the implementation of pollution prevention and response measures.

13. **Table 1.1** is included below as a placeholder and will be populated once the final consents, and the associated conditions, are available. When complete, **Table 1.1** will serve to demonstrate how the requirements of each condition have been addressed in this MPCP.

Table 1.1: Consent Conditions to be Discharged by this MPCP

Consent	Consent Condition Reference	Consent Condition Summary	Reference to Relevant Section of this MPCP
Section 36 Consent	(To be completed post-consent)	(To be completed post-consent)	(To be completed post-consent)
Marine Licence	(To be completed post-consent)	(To be completed post-consent)	(To be completed post-consent)

[4] OfSSs will be consented as part of the OfTDA and will be assessed as part of the Bellrock OfTDA EIA Report. The OfTDA is also considered within the Bellrock WFDA EIA's cumulative effects assessments.

1.5.2 Document Revision

14. As stated in **Section 1.5**, this MPCP has been developed to provide sufficient information at the application stage to not require updating and/or further approval prior to commencement of construction. However, to support adaptive management measures and to reflect evolving best practices in maritime pollution prevention and response, this MPCP may be refined and updated throughout the O&M phase.

15. Furthermore, for good practice, an annual review of this MPCP will take place, with refinements made where required.

2 Legislation, Policy and Guidance

16. **Table 2.1** outlines the relevant legislation, policy and guidance for maritime pollution prevention and control that have informed this MPCP. As detailed in the table, this MPCP has been developed following the Scottish Government's Marine Directorate guidance on mitigation and monitoring plans, specifically the guidance relating to MPCPs for offshore renewable energy (MD-LOT, 2025). Any legislation referred to in this MPCP is as subsequently amended and as currently in force as at the date of this document.

Table 2.1: Summary of Legislation, Policy and Guidance Relevant to this MPCP

Document Name	Relevance to this MPCP
Legislation	
International Convention for the Prevention of Pollution from Ships (MARPOL) 1973/1978 (International Maritime Organisation (IMO, 1973/1978)	The primary aim of MARPOL is to prevent and minimise pollution of the marine environment by ships, both from operational activities and accidents.
International Convention for the Safety of Life at Sea (SOLAS), Chapter V, Regulation 19 (IMO, 1974)	The primary aim of SOLAS Chapter V, Regulation 19 is to enhance maritime safety and navigation by mandating the carriage and proper use of certain navigation equipment and systems, including Automatic Identification Systems (AIS) and global navigation satellite systems. This regulation also requires vessels to maintain these systems in efficient working order and to transmit relevant information to enhance situational awareness and facilitate rescue operations.
International Regulations for Preventing Collisions at Sea (COLREGs) 1972 (IMO, 1972)	The key aim of COLREGs 1972 is to establish a universal standard of conduct for all vessels at sea, ensuring maritime safety by preventing collisions. These regulations provide a framework for understanding vessel hierarchy, signalling intentions, and avoiding dangerous situations.
Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 (UK Government, 1996)	The primary aim of the Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 is to implement COLREGs, ensuring safe navigation by prescribing vessel conduct, display of lights and signals, and collision avoidance procedures. These regulations apply to UK vessels and other vessels in UK waters and are designed to reduce the risk of accidents at sea.
Merchant Shipping (Prevention of Pollution by Oil) Regulations 2019 (UK Government, 2019)	The primary goal of the Merchant Shipping (Prevention of Pollution by Oil) Regulations 2019 is to prevent and minimise oil pollution from ships, both from accidental spills and routine operations. These regulations implement Annex I of MARPOL, which sets internationally agreed technical standards for UK and foreign-flagged vessels.
Merchant Shipping (Safety of Navigation) Regulations 2002 (UK Government, 2002)	The primary goal of the Merchant Shipping (Safety of Navigation) Regulations 2002 is to ensure the safety of navigation for all ships, including the carriage and use of equipment to assist in safe navigation, the receipt of vital safety information, and

Document Name	Relevance to this MPCP
	communications. This is achieved by implementing Chapter V of SOLAS.
Policy	
UK National Contingency Plan for Responding to Marine Pollution Incidents 2024 (MCA, 2024)	The primary aim of the UK National Contingency Plan for Responding to Marine Pollution Incidents is to ensure a timely, measured, and effective response to marine pollution incidents and their impact. This includes incidents arising from both marine and terrestrial sources, and from both ships and offshore installations.
Guidance	
Marine Licensing and Consenting: Offshore Renewable Energy Projects – Mitigation and Monitoring Plans (MD-LOT, 2025)	This guidance provides guidance of the development of mitigation and monitoring plans, including MPCPs, that are required for s.36 Consent applications and Marine Licences applications for the construction and/or operation of offshore renewable energy generating stations and offshore transmission infrastructure.
Guidance Notes for Preparing Oil Pollution Emergency Plans (MCA, 2022)	This guidance sets out the requirements for offshore operators to prepare effective oil pollution response plans, covering reporting, communication, and tiered response. Aimed at oil and gas but relevant to offshore renewables where pollution risk exists.
MGN 654: Safety of Navigation: Offshore Renewable Energy Installations Guidance on UK Navigational Practice, Safety and Emergency Response. (MCA, 2021)	This guidance highlights aspects that need to be taken into consideration when assessing the impact on navigational safety and emergency response (search and rescue (SAR), salvage and towing, and counter pollution) caused by offshore renewable energy installation developments.

3 Overview of the National Contingency Plan

17. The NCP (MCA, 2024) describes the processes at a national level for responding to the release of oil, hazardous and noxious substances, inert material, or a combination of all of these, which have the potential to threaten wildlife, on land as well as within the marine and coastal environment, public health, and local and national economies. It is designed primarily for spills of national significance comprising Tier 2 or Tier 3 pollution incidents. The NCP (MCA, 2024) outlines the following potential theatres of response when dealing with maritime incidents relating to the Bellrock WFDA, which can either be set up independently or may be set up in parallel:

- His Majesty's Coastguard, responsible for managing SAR operations;
- The MCA, responsible for overseeing the 'at sea' response; and
- The UK Secretary of State's Representative for Maritime Salvage and Intervention, responsible for overseeing the source/containment/salvage response.

18. The activation of the NCP (MCA, 2024) is the responsibility of the MCA and, in the event of a significant release from a vessel or offshore installation, the primary responder shall report the incident to the nearest MCA Coastguard Maritime Rescue Coordination Centre (MRCC) by telephone. It is the MRCC's responsibility to contact the vessel or offshore installation to determine details of the incident and enable an appropriate response.

19. The MRCC would then initiate any SAR operations that may be required by way of response. The MRCC would notify the MCA Duty Counter Pollution and Salvage Officer (DCPSO), MCA Headquarters and the Marine Accident Investigation Branch of any pollution incident or risk of significant pollution. The DCPSO decides if a regional or national response is required, as criteria for triggering the different scales of response are not provided in the NCP (MCA, 2024).

20. If either a regional or national response is activated, the MCA may deploy several response units and set up response centres, such as the Marine Response Centre (MRC) or the Shoreline Response Centre. These Units, if deployed, will act to work with and support the spill response actions, including the Marine Coordination Centre (MCC) implemented by the Applicant.

4 Summary of Mitigation and Monitoring Measures

21. **Table 4.1** provides a summary of the mitigation measures identified in **Appendix 5.1: Mitigation and Monitoring Register** (**Volume IV)** of the Bellrock WFDA Environmental Impact Assessment (EIA) Report that are of relevance to marine pollution prevention and response, and therefore this MPCP.

Table 4.1: Summary of the Bellrock WFDA EIA Report Mitigation Measures of Relevance

Mitigation Measures	Where Addressed
Development of and adherence to a MPCP outlining the approach for managing and reducing risk of pollution and procedures to protect personnel and to be followed in the event of a pollution incident.	This mitigation measure is addressed through the development, and subsequent implementation, of this MPCP.
An EMP will be prepared and implemented to set out the procedures to avoid, reduce, and manage potential environmental effects arising across the construction and O&M of the Bellrock Wind Farm Infrastructure, in accordance with relevant international and national legislation and guidance.	This mitigation measure is addressed through the development, and subsequent implementation, of this MPCP.
Marine coordination will be implemented to manage project vessels throughout construction, O&M, and decommissioning periods, including in liaison with relevant ports and harbours.	This mitigation measure is addressed through the development, and subsequent implementation, of this MPCP. **Section 5.1.2** and **Section 6.1.1**, in particular, provide detail on marine coordination.
Project vessels will ensure compliance with international marine regulations as adopted by the Flag State, including COLREGs and SOLAS, thereby reducing the risk of navigational incidents, including vessel collisions, and associated risks to other sea users and the marine environment.	This mitigation measure is addressed through the development, and subsequent implementation, of this MPCP. **Section 5.1.2** provides detail on control measures, including compliance to both SOLAS and COLREGs.
Adherence to the following international and national regulations and guidance, namely: ▪ International Convention for the Prevention of Pollution from Ships (MARPOL), which sets out requirements, including appropriate vessel maintenance; ▪ The International Convention for the Control and Management of Ships' Ballast Water and Sediments, which provides an international framework for the control of transfer of potentially invasive species from ballast water; and ▪ Consideration of guidance from the International Maritime Organisation (IMO, 2023) on the control and management of ships' biofouling to minimise the transfer of invasive aquatic species.	This mitigation measure is addressed through the development, and subsequent implementation, of this MPCP. **Section 5** of this MPCP addresses the potential spill scenarios and outlines control measures to reduce the likelihood of pollution incidents occurring.

5 Potential Spill Sources and Control Measures

5.1 Pollution Sources and Risk Assessment

5.1.1 Tier Classification

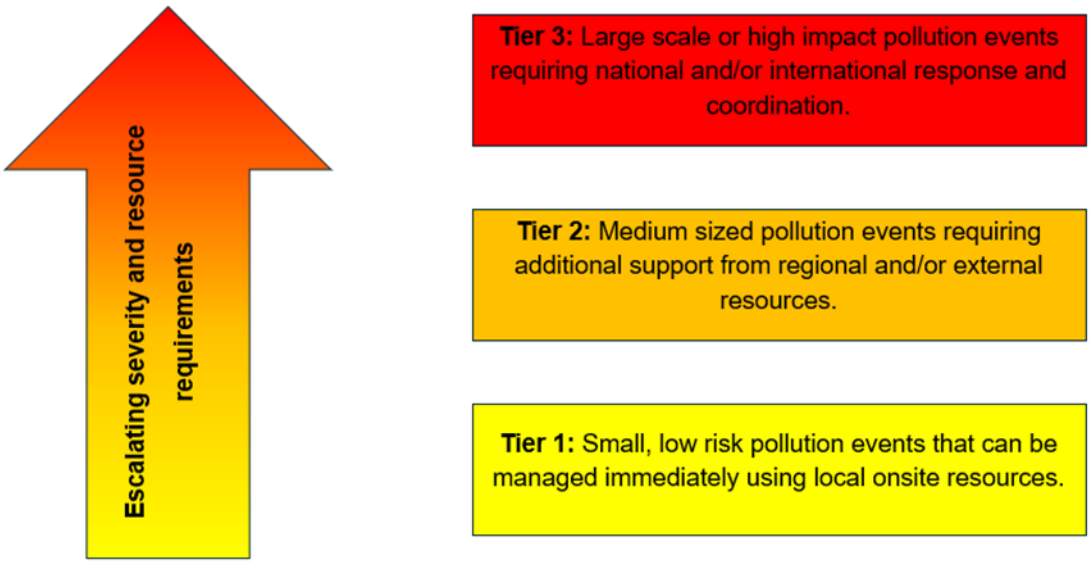
22. Potential spill scenarios will be determined by the chemical inventories (including hydrocarbons) associated with the construction and O&M activities associated with the Bellrock Wind Farm Infrastructure.

23. Spill responses are generally categorised into three tiers based on the size and severity of the spill itself, the resource required for an effective response, and the potential impact on environmental and human receptors. This tiered approach ensures that an appropriate and scalable response can be mobilised depending on the magnitude of the pollution incident. The tiers are commonly described as follows and illustrated in **Plate 5.1** (based on Marine Management Organisation, 2023):

- **Tier 1:** The initial response capacity immediately available on site, designed to manage the most likely small-scale and low risk spills. Tier 1 responses are typically managed by the relevant Contractor/Subcontractor with their own resources and spills kits, in line with this MPCP;
- **Tier 2:** Activated for less frequent, medium-scale spills which exceed Tier 1 capabilities and require additional external resources at a regional level. Tier 2 responses typically require mobilisation of regional or multi-agency resources, including local authorities and specialist contractors. Tier 2 responses are coordinated by the Marine Coordinator and supported by spill response coordination to ensure an effective and timely response. Whilst Tier 2 responses may involve regional coordination, they generally do not trigger the full national level response framework established under NCP (MCA, 2024); and
- **Tier 3:** Reserved for very large, high impact spill events (such as significant marine vessel spills) that may require national or international resource. Tier 3 responses may also be triggered for smaller spills in environmentally sensitive areas or when specialist mitigation strategies are required that cannot be sourced and/or coordinated locally. This tier category aligns with the NCP (MCA, 2024), which guides the national response to marine pollution incidents.

24. This tier classification framework helps to ensure that response efforts are proportionate to the nature and scale of the pollution incident, which ensures prompt and efficient action to mitigate environmental and operational impacts. **Section 7** details the process for allocating a tier classification to a pollution incident.

Plate 5.1: Tier Response Classification System



5.1.2 Potential Spill Scenarios and Control Measures

25. **Table 5.1** outlines the potential spill scenarios and associated control measures identified for the construction and O&M phases of the Bellrock WFDA. The information provided is based on a thorough assessment of the likely activities, vessel presence, pollutant types, and the environmental context of the Bellrock WFDA.

26. The spill scenarios and associated control measures presented in **Table 5.1** are relevant across both the construction, and O&M phases of the Bellrock WFDA. As such, the likelihood, with control measures in place, and the response classification system tier of the potential spill scenarios have been assessed to reflect the range of conditions across the construction, and O&M phases. This approach avoids duplicating scenarios by phase while ensuring that the risk assessment is comprehensive and proportionate.

27. The assessment of potential spill scenarios and control measures presented in **Table 5.1** has considered a variety of influencing factors to characterise the spill risk and the planned response requirements, including:

- The number and type of vessel calls to and vessels passing through the Bellrock WFDA;
- The type and volume of pollutants expected to be present, including fuels, lubricants, coolants, and hydraulic fluids;
- The expected frequency and size of potential spills, particularly from high-risk activities;
- The identification of any specific areas within the Bellrock WFDA where there is an increased probability of spill occurring;

- The probable consequences of spills, including operational disruption, environmental damage, and health and safety risks;
- Location of sensitive environmental receptors, such as protected habitats and designated marine areas, such as Special Areas of Conservation, Special Protection Areas, and Nature Conservation Marine Protected Areas;
- The predicted spill movement, which is informed by the prevailing wind, current, and tidal conditions; and
- The potential effects of the pollutants that have been released, particularly oil, on marine and coastal resources.

28. The main sources of pollutants, including hydrocarbons, associated with the Bellrock WFDA are expected to include:

- FOUs: Small quantities of synthetic lubricants, hydraulic oil, gear oil, and diesel required for the yaw systems, pitch mechanisms, gearboxes, and/or stand-by generators; and
- Construction, and O&M vessels: Marine diesel fuels such as Marine Gas Oil (MGO) and Intermediate Fuel Oil (IFO), used by larger vessels. Additional substances include lubricants, hydraulic fluids, and other operational products such as cleaning agents and anti-corrosion applicants.

29. The main source of hydrocarbons associated with the Bellrock WFDA will be the MGOs and the IFOs, used to fuel the construction and O&M vessels. The quantities of these MGOs and IFOs, as well as the other identified pollutants, will be limited by the bunkering capabilities and equipment capacity of the vessels themselves. As such, the realistic maximum credible scenario associated with the Bellrock WFDA is considered to be a complete loss of fuel inventory from one or more large vessels as a result of vessel-to-vessel collision or vessel allision with Wind Farm Infrastructure, such as a FOU.

30. **Table 5.1** includes vessel-to-vessel refuelling as a potential spill scenario. While vessel-to-vessel refuelling is not expected to be routinely required under normal operational conditions, the evolving and currently nascent nature of floating offshore wind means that it cannot be entirely ruled out. Vessel-to-vessel refuelling is therefore included in the assessment to ensure operational flexibility and to ensure that all credible spill pathways are appropriately considered within this MPCP.

31. For the purposes of **Table 5.1**, “equipment refuelling” includes the refuelling of daughter craft from a mother vessel when the daughter craft is carried onboard, as well as vessel-to-infrastructure refuelling where fuel may be transferred from a vessel to fuel tanks located on infrastructure. It also includes routine refuelling of plant and equipment used during construction and O&M activities.

32. Where relevant, **Table 5.1** references roles and responsibilities relating to the Bellrock WFDA and the implementation of this MPCP. For full detail on the roles and responsibilities refer to **Section 6**.

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Table 5.1: Assessment of Potential Spill Scenarios and Control Measures (Construction, and Operation and Maintenance Phases)

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
Vessel to Vessel Refuelling Loss of fuel during vessel to vessel refuelling at sea (where fuel lines run between vessels)	Hydrocarbons (MGOs and IFOs)	To minimise the risk of hydrocarbon pollution during the construction and O&M phases, the following best practice measures will be implemented by all Contractors and Subcontractors, under the coordination of the Marine Coordinator (**Section 6.1**). **Vessel-to-Vessel and Equipment Refuelling** ▪ As relevant to the specific refuelling operation, all fuel transfer operations will be: – Planned, with preparation and review of task-specific risk assessment and method statements (RAMS), and fuel transfer planning tools and checklists; – Restricted to daylight hours and favourable weather conditions, as far as is reasonably practical; and – Supervised by a responsible person (e.g. Chief Engineer) on board, following the vessel's approved fuel transfer procedures and checklists. ▪ A bunker plan will be developed and posted in the Bridge and Machinery Control Room; ▪ A pre-bunkering meeting will be held with all involved personnel, covering at a minimum: – Bunker plan and any anticipated changes; – Task-specific risk assessment and emergency response actions; – Assigned individual roles and responsibilities; and – Review of bunkering checklist items. ▪ Only hoses fitted with non-return valves will be used for the offshore transfer of fuel or other fluids; and ▪ A visual lookout will be maintained throughout the refuelling process to monitor hose integrity and detect any leakage immediately. **Pollution Prevention During Normal Operations** ▪ Spill kits will be readily available onboard all vessels and personnel will be trained and competent in their use;	Low	Tier 2
Equipment Refuelling Loss of fuel during refuelling of equipment (on a vessel, on Wind Farm Infrastructure, or between a vessel and Wind Farm Infrastructure).			Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
		▪ All fuel and oil storage tanks and/or containers will be bunded to 110% of the total volume to contain leaks and spills; ▪ Preventative measures will include the use of trays beneath oil pumps, heaters, and similar equipment, as well as oil gutter ways, to prevent fuel oil from escaping into bilge areas. These containment systems will be regularly inspected, drained, and cleaned; and ▪ Oil pipes and fittings will be routinely inspected for leaks, wear, or fatigue, with prompt repair or replacement where issues are detected. **Regulatory Compliance and Documentation** Vessels over 400 Gross Tonnes (GT) will: ▪ Carry, maintain, and implement a Shipboard Oil Pollution Emergency Plan (SOPEP) in accordance with MARPOL Annex I, Regulation 37, and the Merchant Shipping (Prevention of Pollution by Oil) Regulations 2010; ▪ Maintain an Oil Record Book in line with MARPOL Annex I, Regulation 17, which includes entries for: – Fuel and oil bunkering operations; – Disposal of sludge (oil residues); – Discharge or disposal of machinery space bilge water; – Condition of oil discharge monitoring and control systems; – Accidental or exceptional discharges of oil; and – Additional operational procedures and general remarks. **Personnel Training and Awareness** ▪ All personnel involved in hydrocarbon handling or refuelling will receive training in: – Spill prevention awareness; – Safe handling of hydrocarbons and use of spill response equipment; and – Emergency response procedures and escalation protocols.		

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
		Safety Data Sheets (SDS) and Control of Substances Hazardous to Health (COSHH) Compliance ▪ All hazardous substances are required to have up-to-date SDSs, which detail safe handling, storage requirements, and spill response procedures. COSHH assessments will also be undertaken for the project specific chemicals, which will help ensure regulatory compliance and safe working practices.		
Marine Vessel Incident **Vessel to Vessel Collision** Loss of fuel from collision between two vessels. **Vessel to Structure Allision** Loss of fuel from allision between a vessel and a structure (e.g. FOU). **Vessel Stranding/Grounding** Loss of fuel due to vessel stranding/grounding	Hydrocarbons (MGOs and IFOs)	**Collision and Allision Risk Management** ▪ To minimise the risk of potential vessel-to-vessel collisions, vessel to structure allisions, or vessel stranding/grounding during the construction and O&M phases, the Applicant will implement and fully comply with a robust suite of navigational safety measures. **Navigational Controls** ▪ All project vessels must operate in full compliance with project-specific navigational protocols, exclusion zones, and vessel routing measures. These controls will be defined in the Vessel Management and Navigational Management Plan. The Vessel Management and Navigational Management Plan will be developed and submitted post-consent, once detailed information on the construction methodologies, vessel types, and marine operations are confirmed. **Marine Coordination** ▪ A centralised marine coordination system (MCS) will be set-up to oversee, monitor, and coordinate vessel movements within the Bellrock WFDA. The MCS will be responsible for: – Vessel tracking and monitoring: The MCS will track all vessel entering and leaving the Bellrock WFDA; – Personnel management: The MCS will monitor the movement of personnel to and from the Bellrock WFDA;	Very Low	Tier 2 (Possibly Tier 3)
	Lubricating oil		Very Low	Tier 2
	Hydraulic oil		Very Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
	Chemicals	– Conflict prevention: The MCS will help to identify and mitigate potential conflicts between simultaneous operations (such as Bellrock OfTDA operations or near-by offshore wind farms); – Communication and coordination: The MCS will help to ensure efficient lines of communication between the Marine Coordinator (or delegated personnel), vessel crews, and other relevant stakeholders; and – Safety compliance: The MCS will also monitor compliance of all marine operations undertaken in association with the Bellrock WFDA to the relevant safety regulations and procedures. **Regulatory Compliance for Collision Risk Management** ▪ In addition to the project-specific control measures designed to minimise the risk of collisions, allisions, and strandings/groundings, project vessels will also comply with a number of international conventions, which are implemented and enforced through UK legislation. **COLREGs (1972)** ▪ COLREGs are transposed into UK law through the Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996 and is enforced by the MCA; ▪ The requirements of COLREGs apply to all vessels operating in UK water regardless of flag, key requirements include: – Maintaining a proper lookout (Rule 5); – Operating at safe speeds (Rule 6); – Adhering to right of way rules (Rules 11 to 18); – Using navigational lights and sound signals, as stipulated (Part C, Rules 20 to 31); and – Following special procedures during restricted visibility (Rule 19). **SOLAS, Chapter V, Regulation 19** ▪ Regulation 19 of SOLAS Chapter V requires specific classifications of vessels to be fitted with an AIS to support safe navigation and collision avoidance;	Very Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
		▪ In the UK, the requirements of SOLAS have been transposed into law through several merchant shipping regulations, with the requirements of SOLAS Chapter V Regulation 19 transposed through the Merchant Shipping (Safety of Navigation) Regulations 2002; ▪ AIS carriage is mandatory for the following classifications of vessel: – All commercial vessels ≥300 GT on international voyages; – Cargo vessels ≥500 GT not engaged on international voyages; and – All passenger vessels, regardless of size. ▪ Whilst AIS is not legally required for all vessels operating within UK waters, many vessels, that are not with the categories identified above, voluntarily carry AIS to enhance navigational safety. The carriage of AIS of vessels enables: – Continuous transmission of real-time vessel information, including position, speed, course, and identity; – Improved situational awareness and decision making for collision avoidance; and – Seamless integration with the MCS, helping to support centralised monitoring and management. **SDS and COSHH Compliance** ▪ All hazardous substances are required to have up-to-date SDSs, which detail safe handling, storage requirements, and spill response procedures. COSHH assessments will also be undertaken for the project specific chemicals, which will help ensure regulatory compliance and safe working practices.		
Failure of Plant or Equipment Release of fuel due to failure of plant or equipment	Hydrocarbons (MGOs and IFOs)	To mitigate the potential for pollutant release as a result of plant and/or equipment failure, the following measures will be implemented and maintained throughout all offshore activities.	Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
	Lubricating oil	**Equipment Operation and Maintenance** ▪ All plant and equipment will be operated and maintained in accordance with manufacturer specifications/guidelines or industry best practice and legal requirements; ▪ Planned preventative maintenance (PPM) schedules will be followed to ensure plant/equipment are maintained in a good state of repair; and ▪ PPM activities will be recorded and logged to demonstrate compliance with the PPM schedule and for auditing purposes. **Personnel Competency** ▪ Only trained, competent, and qualified personnel will operate plant and equipment; and ▪ Plant/equipment operators, as well as maintenance teams, will receive appropriate training in spill prevention, equipment handling, and emergency response procedures relevant to the substances in use. **Bunds and Secondary Containment** ▪ All fuel, oil, and chemical storage tanks or containers will be bunded to at least 110 % of the largest single tank volume, or 25 % of the total stored volume, whichever is greater, in accordance with best practice and guidance; and ▪ Bunds and secondary containment systems will be inspected regularly to ensure effective containment of any leaks or spills. **Leak Prevention and Monitoring Systems** ▪ Equipment such as oil pumps, heaters, fuel-handling systems, hydraulic systems, and chemical dosing units will be fitted with drip trays, oil gutter ways, or other appropriate containment measures to prevent the release of pollutants into bilge areas or the marine environment; and ▪ These systems will be routinely inspected, cleaned and drained, as required, to maintain effectiveness. **Inspection of Lines and Fittings** ▪ Fuel, oil, hydraulic, and chemical lines, including hoses and fittings, will be regularly inspected for signs of damage;	Low	Tier 1
	Hydraulic oil		Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
		▪ Any identified defects or potential sources of leakage will be addressed immediately, and defective components will be repaired or replaced; and ▪ Records of all inspections and corrective actions will be maintained.		
Spillage During Use of Equipment Small localised spills during equipment operation.	Hydrocarbons (MGOs and IFOs)	To mitigate the potential for pollutant release as a result of spillage during the use of equipment, the following measures will be implemented and maintained throughout all offshore activities. **Task Planning and Risk Assessment** ▪ All activities involving hydrocarbons, lubricants, hydraulic systems will be supported by task specific RAMS; and ▪ Risk controls will be proportionate to the type and amount of substance involved in the activity. **SDS and COSHH Compliance** ▪ All hazardous substances are required to have up-to-date SDSs, which detail safe handling, storage requirements, and spill response procedures. COSHH assessments will also be undertaken for the project specific chemicals, which will help ensure regulatory compliance and safe working practices. **Training and Competence** ▪ All personnel will be trained and competent in proactive spill prevention, safe equipment operation, and the use of spill response equipment; and ▪ Operators will also be familiar with the specific hazards associated with the substances in use, as identified in the substance specific COSHH assessments. This includes understanding what personal protective equipment (PPE) is required, safe handling procedures, and knowing the location of, and how to use, spill containment and response equipment. **Spill Response Equipment** ▪ Appropriate spills kits will be clearly marked, easily accessible at key work locations, and routinely checked.	Low	Tier 1
	Lubricating oil		Low	Tier 1
	Hydraulic oil		Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
		Equipment integrity and Monitoring ▪ Equipment in active use will be routinely checked for leaks, wear, and/or damage; and ▪ Drip trays and other local containment measures will be used wherever practical to catch any small-scale leakages. **Bilge Protection** ▪ Measures will be in place to prevent pollutants from entering bilges, these measures will also be regularly inspected, drained and cleaned to ensure their efficient operation.		
Spillage During Use Spillage of paints, paint thinners, solvents, and cleaning fluids during use.	Chemicals	To mitigate the potential for the uncontrolled release of chemicals during their use, the following measures will be implemented and maintained throughout all offshore activities. **Risk Assessments and Method Statements** ▪ Task specific RAMS will be prepared, reviewed, and adhered to in order to identify and mitigate chemical spill risks. **Personal Training and Competency** ▪ Personnel will be trained in the correct and safe handling and use of chemicals, spill prevention, and the use of spill response equipment, including spill kits. This includes understanding the hazards associated with the specific chemical substances that they use within the scope of their activities, as well as the location and proper use of the containment and response equipment available to them on site. **SDS and COSHH Compliance** ▪ All hazardous substances are required to have up-to-date SDSs, which detail safe handling, storage requirements, and spill response procedures. COSHH assessments will also be undertaken for the project specific chemicals, which will help ensure regulatory compliance and safe working practices. **PPE** ▪ Appropriate PPE will be provided, and worn, by personnel handling chemicals, in line with the requirements of the SDSs and COSHH assessments. Adherence to PPE requirements will minimise personal exposure to chemicals and help ensure safe working practices are maintained.	Low	Tier 1

Spill Scenario	Potential Pollutant	Control Measures	Likelihood with Control Measures in Place	Response Classification System Tier
		Chemical Storage and Segregation ▪ Hazardous chemicals will be stored in designated, clearly marked areas with appropriate segregation to prevent cross-contamination or uncontrolled reactions. Storage areas will include secondary containment capable of holding at least 110% of the largest container's volume or 25% of the total stored volume, whichever is greater. Furthermore, incompatible substances, such as certain liquids and powders, will be stored separately to prevent cross-contamination or chemical reactions. Where both are stored in the same cabinet/bund, powders should be stored above liquids to reduce the risk of contamination in the event of a leak. **Spill Response Preparedness** ▪ Spill kits, and other appropriate spill response equipment, suitable for the chemicals that will be used on site will be readily accessible to personnel. Spill response equipment will also be checked and maintained in good condition, to ensure effective use, if needed.		

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6 Command Structures

6.1 Tier 1 Command Structure (Roles and Responsibilities)

33. In the event of a Tier 1 incident, the command structure flows from the Applicant to the Contractors/Subcontractors. Vessel Masters will always retain full command of their own vessels but will follow direction from the Applicant as appropriate to ensure a coordinated and effective Tier 1 response.

34. **Table 6.1** provides information on the roles and responsibilities of key project personnel in relation to this MPCP and the Tier 1 response structure.

Table 6.1: Roles and Responsibilities of Key Personnel Relevant to this MPCP

Role	Responsibility
Applicant	The Applicant will contractually require all Contractors and Subcontractors to take responsibility for the prevention of, and response to, pollution events originating from their activities that are associated with the Bellrock Wind Farm Infrastructure. The Applicant is also responsible for ensuring that all formally contracted parties are aware of, and fully comply with, the requirements of this MPCP, and that appropriate pollution prevention and response measures are implemented throughout the delivery of contracted works.
Quality, Health, Safety, and Environment (QHSE) Manager	Key responsibilities in relation to this MPCP include: ▪ Leading on contact with spill response coordination in the event of an incident; ▪ Collation of performance data (including live incident data); ▪ Leading on incident investigations; ▪ Leading with regard to transport, waste, and equipment; and ▪ Emergency response liaison with Marine Coordinator.
Marine Coordinator	Key responsibilities in relation to this MPCP include: ▪ Monitoring vessel movements; ▪ In a Tier 1 incident, the Marine Coordinator will liaise with the Vessel Master for any clean-up procedures, notify other vessels in the vicinity, and coordinate other required responses; ▪ Escalation of incidents to Tier 2 or Tier 3 where required; and ▪ Providing the Applicant logistical support for the MCA and other response groups set up in response to the incident.
Head of Construction	Key responsibilities in relation to this MPCP include: ▪ Leading on personnel and Contractor support for the Environmental Clerk of Works (ECoW) where required (including during incidents);

Role	Responsibility
	▪ Ensuring that any corrective actions arising from environmental audits are addressed (including spill training, during incidents and incident reviews); and ▪ Ensuring any Contractor and Subcontractor non-compliance is reported and addressed.
Consents Lead	Key responsibilities in relation to this MPCP include: ▪ Leading on all incident-related reporting, returns and notifications to the MD-LOT and relevant stakeholders as required; ▪ Ensuring compliance with this MPCP, supported by the ECoW; and ▪ Primary contact for statutory bodies and stakeholders (excluding the responsibilities undertaken by the ECoW).
ECoW	Key responsibilities in relation to this MPCP include: ▪ Reporting on compliance and environmental issues to the Applicant and to MD-LOT (including incident and near-miss reporting); ▪ Reviewing and reporting incidents and near misses to MD-LOT; ▪ Working with Contractors and the Applicant's QHSE and consents teams to establish practical environmental communication and reporting protocols (including incidents); ▪ Attending incident meetings and providing environmental input (including environmentally sensitive information relevant to spill response); ▪ Reviewing relevant Contractor documents from a compliance perspective, including contractor EMP and risk assessments; and ▪ Liaising directly with MD-LOT, statutory bodies and stakeholders as required, including agreement of communication strategy.
Contractors/Subcontractors	Key responsibilities in relation to this MPCP include: ▪ Ensuring sufficient resources and processes are in place to deliver/comply with this MPCP and managing potential environmental impacts, including those of any Subcontractors; ▪ Reporting to the Applicant's Consents Lead; ▪ Developing EMPs in line with the requirements of this MPCP for the Applicant to review and comment; ▪ When mobilised (under Tier 1 incident), ensuring Contractors and Subcontractors adhere to the requirements of this MPCP, and their EMPs and method statements; and ▪ Producing and maintaining records of activity on site and communicating those to the ECoW to enable reporting of compliance to MD-LOT.
Spill Response Coordination	The Applicant will ensure a suitable capability is planned, prior to construction starting, to provide support in the event of a Tier 2 or Tier 3 pollution incident. Routine minor spills or low-volume incidents, defined as Tier 1 incidents, will be managed by the relevant Contractor or Subcontractor directly, using onboard or site-based pollution prevention and response equipment. This Spill Response capability may provide a degree of advisory support for Tier 1 incidents but would not typically be mobilised

Role	Responsibility
	unless the incident is escalated, or additional capacity is requested by the Applicant. Responsibilities will include: ▪ Ensuring access to appropriate equipment, personnel and resources to respond to Tier 2 and Tier 3 pollution incidents; ▪ Ensuring capabilities to respond to Tier 2 and 3 pollution incidents within agreed time frames; ▪ Supporting the Applicant in coordinating clean-up operations and liaising with relevant regulatory bodies where required; and ▪ Providing specialist advice and operational support in the event of Tier 2 or Tier 3 pollution incidents. The Spill Response resources will operate in conjunction with the Marine Coordinator and the QHSE Manager and will adhere to the structure and escalation pathways identified within this MPCP.

6.1.1 Marine Coordination

35. Prior to the commencement of the construction, a dedicated MCC will be established to oversee and manage offshore construction activities. The MCC will serve as the central hub for coordinating vessel movements, personnel transfers, and logistical operations within the Bellrock WFDA. A Marine Coordinator will be appointed to operate the MCC. The Marine Coordinator will have overall responsibility for the coordination of daily marine operations and will act as the primary point of contact for marine related incidents, as well as monitoring the implementation of this MPCP.

36. In the event of a Tier 1 pollution incident, the marine coordination function will respond as follows:

- **Initial Notification:** The Marine Coordinator will be notified of any pollution incident immediately by the Vessel Master. If the spill is not vessel based, notification will come directly from the first responder (spill observer);
- **Incident Categorisation:** The Marine Coordinator, in consultation with the Vessel Master, will assess the situation and categorise the incident as either a Tier 1, Tier 2, or Tier 3 pollution incident, enabling an appropriately scaled response;
- **Internal Communication:** The Marine Coordinator will then notify the QHSE Manager and the ECoW of the incident and provide ongoing progress/situation updates;
- **Coordination of Response:** Clearly define roles and responsibilities, allocate personnel and resources, and coordinate the response in accordance with the scale and nature of the incident;
- **Communication Management:** Ensure dedicated communication personnel are available to relay critical information between the incident site and the MCC;
- **Escalation/De-escalation:** Escalate the response where necessary by activating contracted Tier 2 or Tier 3 resources or by involving authorities. De-escalation decisions should reflect the incident's progression and status;
- **Liaison with External Partners:** Engage with relevant authorities, spill response coordination, specialist contractors, and other relevant stakeholders;

- **Response Termination:** Support the termination of the incident response;
- **Waste Management:** Coordinate waste storage and disposal in line with environmental regulations and project-specific protocols;
- **Decision-Making Documentation:** Maintain detailed records of all key decisions, actions taken, communications, and changes in incident status throughout the response. This ensures traceability and supports post-incident reviews; and
- **Financial Management:** Track and document all costs incurred during the response, ensuring transparency and accountability for auditing purposes.

37. It should be noted that not all the functions listed above are relevant to a Tier 1 incident. This list will be amended on an incident-by-incident basis.

6.1.2 Incident Reporting Procedure

38. The Applicant has a responsibility to keep the MD-LOT informed of any incidents that may be in the public interest. In the event of a breach of health, safety, or environmental obligations related to the Bellrock WFDA, and following any required statutory notifications, the Contractor must notify the Marine Coordinator as soon as possible.

39. The Contractor holds primary responsibility for responding to any such incident. The response shall be executed in accordance with the Contractor's own compliant response procedures and/or those outlined in relevant consent plans.

40. All Contractors will have in place:

- A system for the investigation and root cause analysis of incidents and accidents; and
- A process for sharing all findings and investigation reports with the Applicant, including interim reports where investigations exceed two weeks in duration.

41. Where the Applicant deems it necessary, based on the nature, scale, or impact of the incident, the Applicant reserves the right to conduct their own investigation. The Contractor will fully support this process as required.

42. Additionally, each Contractor will maintain a project-specific ERP that is tailored to the scope of their work. These ERPs must align with the overarching ERCoP and MPCP.

6.1.3 UK NCP Requirements

43. The key requirement in the NCP (MCA, 2024) relating to Tier 1 incidents, is if an incident exceeds the Bellrock WFDA's internal response capabilities (especially in the provision of counter pollution equipment and personnel), then additional capability escalation to Tier 2 or 3 may be required. This also applies if response contractors become overwhelmed and require equipment or expertise beyond their capabilities.

44. In all such events, additional response capability should be sourced from other accredited pollution response contractors or the use of national assets via the MCA. Additional details on the requesting and use of national pollution response assets can be found in Section 9.6.1 of the NCP (National Assets, Resources and Response Options) (MCA, 2024).

7 Pollution Incident and Response Procedure

45. **Section 7** provides an overview of the structured pollution incident response procedure that will be implemented via this MPCP. The flow chart (**Section** Error! Reference source not found. (**Plate 7.1)**) illustrates the iterative nature of the pollution response process, highlighting key steps related to notification, evaluation (and re-evaluation), decision-making, and escalation. The subsequent sub-sections (**7.2** to **7.6**) provide further details on each step of the response in a linear, stepwise format for clarity, ensuring that all essential actions are clearly documented and actionable by the relevant personnel.

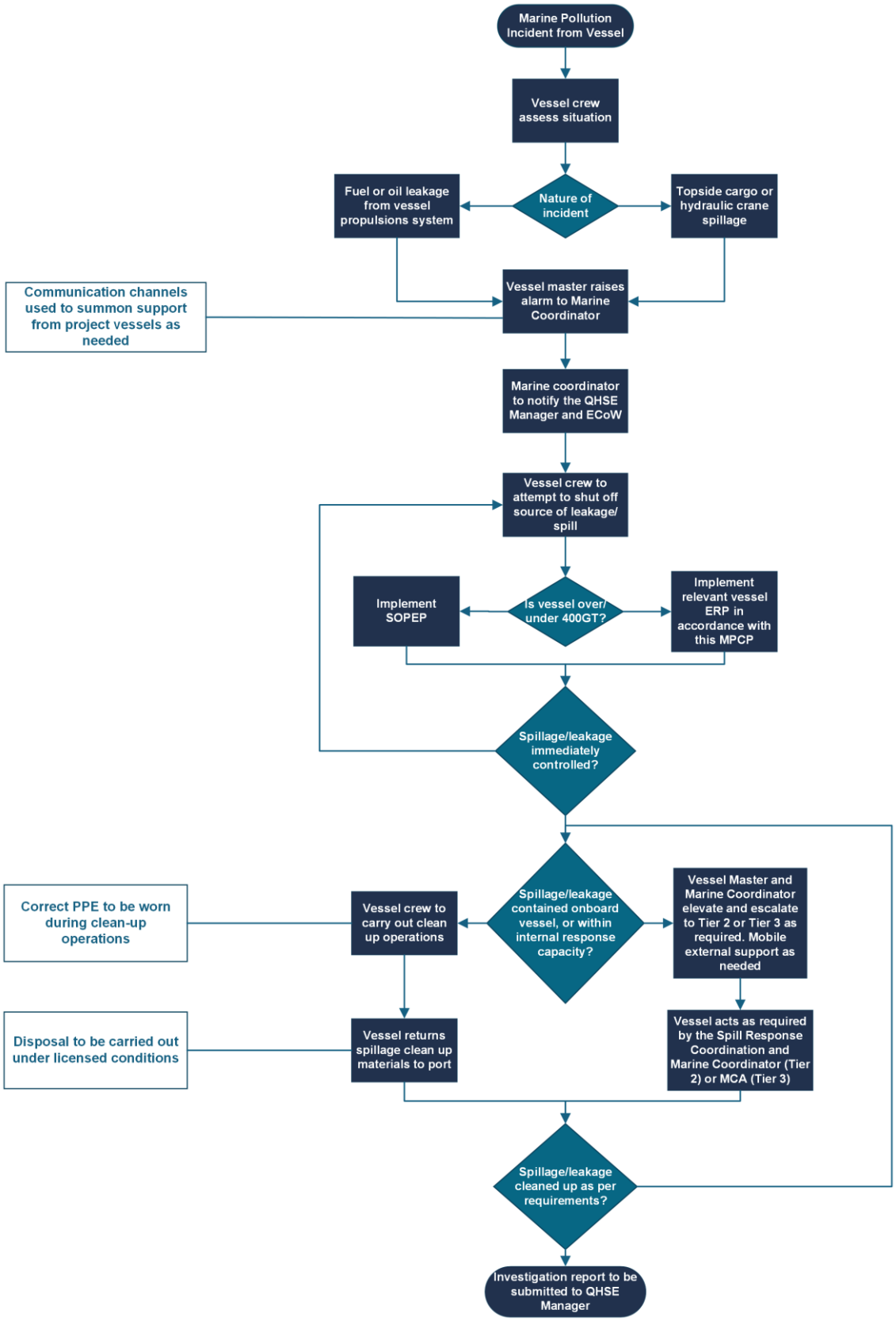
7.1 Incident Response Process

46. **Plate 7.1** outlines the structured response process for pollution incidents originating from a vessel. It details the steps that will be taken by vessel crew, from assessing the situation and raising the alarm to containing and cleaning up the spill.

47. **Plate 7.1** also highlights key communication requirements, including notifying the Marine Coordinator, the Consents Lead, and external authorities, such as the MCA MRCC. Depending on the nature and severity of the incident, actions may include activating SOPEPs, using appropriate PPE, coordinating with support vessels, and disposing of waste under licensed conditions. The process concludes with the submission of an investigation report to the QHSE Manager.

48. The process for responding to a pollution incident from project structures, such as a FOU, is broadly the same as for a vessel-based event, as detailed in **Plate 7.1.** During the construction phase, pollution incidents are likely to be detected by installation vessel crews or other personnel working on or near the structure, who will also be responsible for initiating containment and response actions. In the O&M phase, pollution may be detected through routine inspections, remote monitoring systems, or third-party reports, with the O&M crew responsible for responding when on site or mobilised as required. In all cases, the same steps for containment, communication, clean-up, and reporting apply.

Plate 7.1: Overview of the Incident Response Process for a Vessel-based Incident



7.2 Notification

49. To make an initial assessment of the pollution incident and to facilitate the appropriate actions, the first responder (the spill observer) will provide the Marine Coordinator, either directly in the event of a non-vessel pollution incident, or via the Vessel Master in the event of a vessel spill, with the following information:

- Date and time of observation: Local time or Greenwich Mean Time/Coordinated Universal Time;
- Position of the pollution incident (latitude and longitude, vessel name etc);
- Source and cause of pollution (e.g. name and type of vessel, incident type such as collision);
- Estimate of the amount of pollutant spilled, its type and characteristics;
- Description of the spilled pollutant including direction, length, breadth, and appearance of slicks; and
- Current and forecasted weather and sea conditions.

50. The below actions will also be undertaken by the first responder, if safe to do so:

- Contact all personnel in the vicinity of the pollution incident and warn of the potential hazard;
- Stay in the vicinity of the pollution incident and continue to monitor the incident as it develops; and
- Take any reasonable actions to contain or reduce the pollution incident.

51. It is critical to maintain a log of decisions and actions as soon as the incident is notified.

7.2.1 Contact Details

52. All marine pollution incidents involving vessels and/or offshore installations, no matter their magnitude, must be reported as soon as is safely possible to the MRCC. The Aberdeen MRCC has jurisdiction for a large area of sea along the east coast of Scotland, as such any marine pollution incident related to the Bellrock WFDA should be reported immediately to the Aberdeen MRCC via phone on 0344 382 0584. Alternatively, the Aberdeen MRCC can be contacted via Very High Frequency radio on Channel 16 (the channel used to report any vessel or offshore installation incident). Once initial contact has been made the Aberdeen MRCC may direct the caller to another working channel.

53. Once the initial verbal notification has been made to Aberdeen MRCC, this must be followed up, as soon as practicable, by the submission of a Pollution Report (POLREP) via email (or fax), which must be sent to zone3@hmcg.gov.uk. The POLREP proforma is provided in **Appendix B: Pollution Reporting Form**.

54. Upon receipt of the POLREP, Aberdeen MRCC consults with the MCA Counter Pollution and Salvage Branch, which provides specialist advice. The MRCC simultaneously disseminates the POLREP to relevant authorities and stakeholders to support a coordinated response.

7.3 Evaluation

55. Based on the information identified in **Section 7.2** and using **Table 7.1**, the Marine Coordinator will make an initial assessment of the pollution incident, call for external support, if required, and notify the QHSE Manager.

56. The Marine Coordinator will then mobilise the Tier 1 response personnel to standby and to advise whether the pollution incident requires escalation to Tier 2 or Tier 3.

57. If the incident is beyond the internal response capabilities the Marine Coordinator will advise immediate escalation of the incident to either Tier 2 or Tier 3.

58. Dependent on the type and quantity of the spill pollutant, clean-up may not be required if the pollutant is likely to disperse to low levels through natural processes.

59. As stated above, **Table 7.1** assists in determining the appropriate tier response level for a pollution incident. Response actions are influenced by several factors, including (but not limited to):

- Type and volume of released substance;
- Persistence and behaviour of the substance;
- Likelihood of natural dispersion;
- Time of the year, weather, and tidal level;
- Location and environmental sensitivities;
- Available resource; and
- Potential for escalation.

Table 7.1: Tier Response Selection Guide

Tier Level	Trigger Point	Response Level	Tier Selection Considerations
Tier 1	Oil or chemical release to sea	Response within the capability of on-site resources	▪ Spilled pollutant likely to disperse naturally in a short time frame; ▪ Localised and minor environmental impact; ▪ Involves light oils, diesel, or rapidly evaporating chemicals; ▪ Escalation unlikely; and ▪ Release is not ongoing.
Tier 2	Onshore response organisation activated	Response exceeds on-site capability, but is within the capability of regional/external resources	▪ Oil spill contractor resource required; ▪ Ongoing release but of a restricted volume of pollutant; ▪ Larger diesel spills; and ▪ Escalation potential exists.

Tier Level	Trigger Point	Response Level	Tier Selection Considerations
Tier 3	NCP (MCA, 2024) activated by MCA	Response exceeds regional/external capability, and requires national/international resource	▪ Government agency intervention required; ▪ Ongoing large-scale release of pollutant; and ▪ High risk of significant environmental impact on either the shoreline or marine environment.

7.4 Initiation

60. If the pollution incident requires an active response, the Marine Coordinator will consider establishing a Command Centre, which will be located at the Bellrock WFDA's MCC or another suitable location (refer to the Tier 1 Command Structure roles and responsibilities (**Section 6.1**)).

61. To determine whether an active response is required, the following will be assessed:

- Whether key environmental or operational resources are threatened, or if the pollution is likely to disperse naturally without intervention;
- Whether a response is feasible or effective given the circumstances; and
- Whether the scale or impact of the incident requires escalation beyond a Tier 1 response.

62. If applicable, the relevant Vessel Master will activate the SOPEP or an equivalent vessel-specific spill plan.

63. Based on this assessment, a decision on the appropriate level of response initiation needs to be made:

- No active response beyond observation and reporting;
- Initiate Tier 1 response; or
- Escalate to a Tier 2 or Tier 3 response as required.

7.5 Mobilisation

64. As detailed in **Section 7.3** and **Section 7.4**, where evaluation and initiation confirm that a Tier 1 pollution incident requires an active response, the following procedure will be implemented to ensure the timely and effective mobilisation of resources:

- Mobilise the equipment, labour, and materials necessary for the chosen response techniques, including arrangements to place response resources on stand-by while awaiting the order to mobilise;
- Deploy equipment in accordance with the response decisions; for example, identifying vessels from which equipment could be deployed, and placing booms at pre-designated sites to protect key resources, with reference to booming plans annexed to this MPCP and any applicable SOPEPs when known; and
- Ensure records of activity, decisions, and expenditures are maintained.

Table 7.2: General Response Strategies According to Spill Tier and Pollutant Type

Tier Level	Response Strategy	
	Non-Persistent Oil (MGO and Diesel)	**Persistent Oil (IFO, lubricating oils, and hydraulic oils)**
Tier 1	▪ Natural dispersion and monitoring (using support vessel). If safe to do so, agitate using standby vessel propeller (prop-wash), by steaming through the slick at speed.	▪ Natural dispersion and monitoring. Mechanical recovery where possible. Small booms and sorbents for Tier 1, beyond that capacity escalate to Tier 2.
TIER 2 AND 3 POLLUTION INCIDENTS ARE NOT COVERED BY THE SCOPE OF THIS MPCP		
Tier 2	▪ Natural dispersion and monitoring; and ▪ Chemical dispersion only if safety or environmental sensitivities are threatened, in consultation with the relevant authorities.	▪ Consult specialist support from an emergency response team; ▪ Continue to monitor and evaluate strategy using aerial surveillance; ▪ Boat-based dispersant application likely to be the primary response strategy, liaise with emergency response team; ▪ Consider mechanical recovery where possible; and ▪ Mobilise shoreline containment and recovery equipment if shoreline is threatened, spill response coordination to engage additional support if necessary.
Tier 3	Natural dispersion and monitoring (aerial surveillance); and Chemical dispersion only if safety or environmental sensitivities are threatened, in consultation with the relevant authorities.	Contract specialist services through the spill response coordination (Tier 2/3). Continue to monitor and evaluate strategy using aerial surveillance; Aerial dispersant application likely to be the primary response strategy, through the spill response coordination; Consider mechanical recovery where possible; and Mobilise shoreline containment and recovery equipment if shoreline is threatened.

7.6 Termination

65. Termination of response operations for Tier 1 incidents will be considered once the spilled material, and all associated clean-up material and waste have been recovered and disposed of via approved and licensed routes. It should be noted that minor surface sheens or staining may remain and may not be practically recoverable.

8 At Sea Clean-up

66. At sea response to a Tier 1 incident is typically restricted to minimal releases of persistent oils, such as IFOs, lubricating oils, and hydraulic oils, to the water's surface that project personnel have the internal capacity to effectively respond to. Procedures are as follows:

- Follow procedures outlined in **Section 7** of this MPCP to determine whether the pollution incident can be managed under a Tier 1 response. If this is not the case, proceed with immediate escalation to Tier 2;
- If it is determined that the incident can be effectively controlled via a Tier 1 response, proceed with SOPEP procedures and/or instructions provided with the spill response equipment (e.g. spill kits); and
- Ensure all waste material is stored in secure and bunded areas and that all materials used in the clean-up are recovered.

9 Response Tracking and Review

67. Effective tracking of response progress is essential. For Tier 1 incidents, the following procedures will be followed:

- Provide regular updates on the incident status, including whether the release has been stopped or controlled, details of equipment deployed, clean-up progress, and an estimated time of completion. These updates will be communicated to the Marine Coordinator;
- Maintain records of all personnel on site, including the PPE worn and response equipment used during the incident; and
- Comply with all formal reporting requirements, ensuring that all actions and observations are logged and reported as appropriate.

10 Waste Management

68. The management of oil and oily waste will follow the principles of the waste hierarchy (Scottish Government, 2017), prioritising prevention, reuse, recycling, and recovery before disposal. Decisions on temporary storage, treatment, disposal, or potential reuse will account for environmental impacts, legal obligations, and relevant licensing requirements.

11 Record Keeping

69. Comprehensive and accurate record keeping is essential during all pollution response operations. The following types of information will be documented:

- Incident communication: Including initial notifications, updates, and feedback from clean-up operations;
- Meetings and decisions: Records of meetings, key decisions, and the rationale behind them;
- Operational activities: Including timesheets, personnel details, on-site activities, oily waste volumes, deployment and usage of response equipment, and records of support assets (e.g. vessels and vehicles);
- Visual documentation, such as photographs, drone footage, annotated maps, and diagrams;
- Expenditure tracking: Including costs associated with personnel, equipment, logistics, and disposal; and
- Clean-up outcomes: Such as post-response site reports, progress updates, and response effectiveness reviews.

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Appendix A: Figures

Figure A.1: Location of the Bellrock Wind Farm Development Area

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500000 550000 600000 650000 700000 750000 800000 850000

6400000 6350000 6300000 6250000 6200000

N

Buckie
A98
Fraserburgh
A96
Peterhead
A96
A96
A97
Aberdeen
155 m
939 m
Stonehaven
Brechin
Montrose
Strathmore
Arbroath
Carnoustie
Dundee
A917
Kirkcaldy
North Berwick
Forth
Edinburgh
A1
Berwick-upon-Tweed

North Sea

0 50 100 km

Haskoning
Enhancing Society Together
Bellrock

Legend:
Bellrock Wind Farm Development Area

REV	DATE	STATUS	DRW	CHK	APR
1	31/03/2026	Final	DL	ES	BMcG

Coordinate System: WGS 1984 UTM Zone 30N

Source: Esri, CGIAR, N Robinson, NCEAS, USGS, Sources: Esri, TomTom, Garmin, FAO, NOAA, USGS, © OpenStreetMap contributors, and the GIS User Community, © Haskoning UK Ltd, 2026.

Scale @ A3
1:1,000,000

Figure Title:
Location of the Bellrock Wind Farm Development Area

Project: Bellrock Wind Farm Development Area (WFDA)

Report: Marine Pollution Contingency Plan (MPCP)

Drawing No.: RHDV_BEL_CST_REP_0003_137

Figure A.1

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Appendix B: Pollution Reporting Form

CG77 POLREP – Pollution Reporting Form

POLREP forms should be completed by the Vessel Master or Marine Coordinator. Guidance on how to complete the POLREP can be found on the next page.

INITIAL INCIDENT REPORT

A. Classification: -

B. Date/Time/Observer: -

C. Position and Extent of Pollution: -

D. Tide: - **Wind: -**

E. Weather: -

F. Characteristics of Pollution: -

G. Source and Cause of Pollution: -

H. Details of Vessels in area: -

I. Not Used

J. Any Photographs or Samples: -

K. Remedial Action: -

L. Forecast of oil movement: -

M. Names of others informed: -

N. Other relevant information: -

CG77 POLREP – Report Form Guidance

The following information should be provided in an initial pollution report.

Section	Description	Information
PART 1: INFORMATION WHICH SHOULD BE PROVIDED IN AN INITIAL POLLUTION REPORT		
A	Classification	Is the pollution DOUBTFUL or PROBABLE or CONFIRMED?
B	Date/Time/Observer	Enter date and time and by whom
C	Position and Extent of Pollution	By latitude and longitude if possible, state range and bearing from some prominent landmark and estimated amount of pollution, e.g. size of polluted area; number of tonnes of spilled oil; or number of containers, drums etc. lost. When appropriate, give position of observer relative to pollution
D	Tide and Wind	Speed and Direction
E	Weather	Conditions and tidal level
F	Characteristics of Pollution	Give type of pollution, e.g. oil crude or otherwise; packaged or bulk chemicals; garbage. For chemicals, give proper name or United Nations Number, if known. For all, give appearance e.g. liquid; floating solid; liquid oil; semi-liquid sludge; tarry lumps; weathered oil; discoloration of sea; visible vapour etc.
G	Source and Cause of Pollution	From vessels or other undertaking. If from a vessel, say whether as a result of apparent deliberate discharge or a casualty. If the latter, give a brief description. Where possible, give name, type, size, nationality and Port of Registry of polluting vessel. If vessel is proceeding on its way, give course, speed and destination, if known.
H	Details of Vessels in Area	To be given if the polluter cannot be identified and the spill is considered to be of recent origin.
I	Not Used	N/A
J	Any Photographs or Samples	Have photographs or samples been taken?
K	Remedial Action	Actions taken or intended to deal with pollution
L	Forecast of Oil Movement	E.g. will the pollution arrive on beach, estimated timing.
M	Names of Other Informed	Of those informed other than addressees
N	Other Relevant Information	As required

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