

Fishguard Linkspan Replacement

Appendix B

Biosecurity Risk Assessment and Management Plan



Document Status				
Issue	Date	Authored by	Approved by	Comments
01	02/09/2026	G McKee	J McCarey	For Submission

Document Overview

This Bio Security Risk Assessment and Management Plan (BRAMP) sets the controls to prevent the introduction and spread of marine invasive non-native species during the Fishguard Linkspan Replacement works.

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1. Introduction

1.1 Purpose

This BRAMP sets the mandatory biosecurity controls for construction of the Fishguard Linkspan Replacement. It prevents the introduction and spread of marine Invasive Non-Native Species (INNS) through project activities, drives early detection and establishes a controlled response to suspected or confirmed INNS.

1.2 SCOPE

The BRAMP applies to all marine works seaward of Mean High-Water Springs (MHWS) within Port of Fishguard, from mobilisation through construction, testing, commissioning, demobilisation and close-out. It applies to Stenna Line Ports, the Principal Contractor (McLaughlin & Harvey), vessel owners, masters, suppliers, subcontractors, visitors and all personnel handling marine assets, equipment, materials, waste or arisings.

1.3 Relationship to Project Controls

Document / Requirement	BRAMP Relationship
Fishguard Linkspan Replacement oCEMP, April 2026	This BRAMP implements the oCEMP requirement for contractor-led environmental controls, inductions, inspections, incident reporting, risk management and monthly live-document review.
Appendix 8.B INNSMP, March 2026	Authoritative source-pathway-receptor assessment basis. This BRAMP develops its identified significant pathways into construction-ready controls, records and contingency arrangements.
Marine Licence	This BRAMP becomes an operative licence compliance document only after Licensing Authority written approval. Licence-specific conditions prevail where more stringent.
Contractor RAMS	Every relevant RAMS must incorporate the controls in Sections 6–10 before work starts. RAMS must identify asset-specific cleaning, inspection, quarantine, waste and incident actions.
Port Procedures and Vessel Plans	Port emergency arrangements, vessel management arrangements, approved ballast-water arrangements and vessel-specific biofouling plans must align with this BRAMP.

2. Legislative and Policy Context

This BRAMP applies the prevention-first hierarchy in the Great Britain Invasive Non-Native Species Strategy 2023–2030: prevention; early detection and rapid response; then long-term management. It also applies the precautionary principle: absence of records does not establish absence of INNS.

Framework	Project Requirement
Convention on Biological Diversity, Article 8(h)	Prevent introduction of, control or eradicate alien species that threaten ecosystems, habitats or species.
Retained Regulation (EU) No 1143/2014 and the Animal Welfare and Invasive Non-native Species (Amendment etc.) (EU Exit) Regulations 2020	Prevent and manage invasive alien species in Great Britain; comply with applicable restrictions, offences, licensing and enforcement provisions.
Wildlife and Countryside Act 1981	Do not cause or permit actions that unlawfully release, establish or facilitate spread of non-native species; cooperate with any lawful species-control action.
IMO 2023 Biofouling Guidelines	Each construction vessel must hold and implement a ship-specific Biofouling Management Plan, Biofouling Record Book, type-approved anti-fouling system, inspection history and contingency actions.
International Convention for the Control and Management of Ships' Ballast Water and Sediments	Where applicable, vessels must comply with ballast-water and sediment management obligations and retain required records.
NRW Marine INNS Biosecurity Risk Assessment and Management Plan Guidance, 2025	Use a documented risk assessment, proportionate prevention controls, Check–Clean–Dry, monitoring, records and contingency response.
MARPOL	Vessels must maintain up-to-date inspection history compliant with applicable MARPOL requirements.

3. Project and Environmental Setting

The project replaces the linkspan and Jack-Up Barge (JUB) at the Fishguard ferry terminal, Fishguard/Goodwick, Pembrokeshire, Wales. The marine works area lies within Port of Fishguard seaward of MHWS.

Work Package	Relevant Construction Activities
Existing asset removal	Removal of existing linkspan bridge, towers, equipment, kiosk, lattice structure and temporary JUB; approximately 250 m ³ of material removed.
Dredging and redistribution	Plough dredging of loose silts and sands within the pontoon/scour footprint; approximately 2,500 m ³ redistributed to an adjacent deeper scour pocket during the anticipated two-month ferry shutdown.
Piling and structures	Two approximately 2m guide piles; temporary piles; optional piled bankseat on six approximately 1m piles; scour protection; concrete repairs.
Floating plant and delivery	Pontoon and bridge delivery by floating plant and tugs; floating crane activity; pontoon positioning, bridge installation, testing and commissioning.
Materials and arisings	Clean rock armour, steel, concrete/grout, temporary works, recovered structures, biofouling debris and construction waste.

3.1 Baseline biosecurity context

Port of Fishguard has weak tidal currents, predominantly marine salinity and extensive artificial hard substrate. These conditions favour settlement and persistence of fouling organisms. Weak tidal currents reduce rapid dispersal but do not reduce the risk created by vessel, equipment and structure movements.

Record Source	Species / Record	BRAMP Implication
West Wales Biodiversity Information Centre (WWBIC)	Modest barnacle (<i>Austrominius modestus</i>): two 2017 records within approximately 2 km at Goodwick Breakwater and Goodwick Beach.	Treat existing hard structures and immersed assets as potentially fouled. Modest barnacle is established regionally but remains a transferable biofouling organism.
Historic/public records older than five years	Wireweed (<i>Sargassum muticum</i>), broad-clawed porcelain crab (<i>Porcellana platycheles</i>) and small barnacle (<i>Hesperibalanus fallax</i>).	These records do not confirm current presence. Apply precautionary inspection and reporting controls.

Site habitat	Artificial hard structures, quay walls, linkspan infrastructure, JUB and proposed new hard structures.	High suitability for sessile INNS settlement and transfer.
Data limitation	Absence of records does not establish absence.	Controls apply to all assets regardless of visible fouling or local record status.

4. BRAMP Governance

McLaughlin & Harvey holds day-to-day responsibility for implementing this BRAMP and ensuring its supply chain complies. The Biosecurity Manager has authority to stop or isolate affected activity or equipment where safe, reject non-compliant marine assets and require corrective action before mobilisation or restart.

Role	Named person / contact	Mandatory responsibilities
Licence Holder	Stena Line Name and contact: TBC	Submit BRAMP; secure written approval; resource compliance; appoint competent roles; appoint Biosecurity Manager; ensure licence-condition compliance; retain approval and records.
Principal Contractor	McLaughlin & Harvey Name and contact: TBC	Implement approved BRAMP; integrate controls in RAMS and procurement; audit subcontractors; stop non-compliant work.
Biosecurity Manager	Name and contact: TBC	Control asset clearance; maintain logbook; approve mobilisation evidence; lead inspections, toolbox talks, quarantine and initial incident response.
Environmental Manager	Name and contact: TBC	Integrate BRAMP with CEMP; review RAMS; manage audits, non-conformances, reporting and monthly review.
Site Manager	Name and contact: TBC	Plan work sequencing; provide controlled cleaning/quarantine areas; ensure workforce compliance; action daily and weekly findings.
Vessel owner / operator	Name and contact: TBC	Provide pre-arrival vessel declaration, anti-fouling documentation, Biofouling Record Book, inspection history, ballast-water evidence and contingency arrangements.
Vessel Master	Name and contact: TBC	Confirm asset condition, ballast status and voyage history; prevent unauthorised movement; comply with quarantine, inspection and reporting requirements.

Subcontractors and suppliers	Name and contact: TBC	Submit asset declarations and cleaning evidence; use only approved materials; comply with RAMS and report suspected INNS immediately.
All personnel	All staff	Complete induction; identify and report suspected INNS; use Check–Clean–Dry; do not move contaminated assets, water, sediment or debris without clearance.

4.1 Competence, Assurance and Document Management

- Stena Line shall appoint a competent Biosecurity Manager before mobilisation.
- No vessel, floating plant, underwater tool, temporary work or marine-sourced material shall mobilise without appropriate clearance by the Biosecurity Manager.
- The Environmental Manager shall review all relevant RAMS before issue and verify that asset-specific controls match this BRAMP.
- The Biosecurity Manager shall retain records in the project common data environment and site environmental file; access controls and file location are TBC before mobilisation.
- McLaughlin & Harvey will issue controlled copies to all relevant parties and remove superseded versions from use.

5. Risk Assessment Method

The BRAMP uses the Source–Pathway–Receptor (SPR) method. A risk exists where a potential INNS source, a viable transfer pathway and a suitable receptor coincide. The assessment assumes a potential source exists unless evidence demonstrates otherwise. The controls in this BRAMP break the pathway before transfer or settlement occurs.

Rating	Definition	Management response
Low	Transfer is unlikely; receptor suitability or pathway continuity is limited.	Apply standard controls and retain routine evidence.
Medium	A credible pathway exists but defined controls reduce transfer opportunity.	Implement task-specific controls, verify evidence and monitor.
High	A credible source, active pathway and suitable receptor exist; failure would enable transfer or establishment.	Do not proceed without Biosecurity Manager clearance, enhanced inspection and documented controls.
Critical	Confirmed or strongly suspected INNS transfer, contamination, uncontrolled movement or failure of a high-risk control.	Stop or isolate where safe; activate contingency arrangements; notify and restart only when authorised.

The Biosecurity Manager shall reassess the register before mobilisation, when an asset, vessel, source location or methodology changes, after an idle period, following detection or incident, and whenever the Licensing Authority NRW or Environmental Manager requires.

6. Biosecurity Risk Register

Ref	Activity / source	Pathway and receptor	Pre-control	Mandatory controls	Residual	Accountable role	Evidence
BR-01	Existing linkspan, JUB, quay and other hard structures	Fouling detaches or transfers during works; Port hard substrate and receiving waters.	High	Pre-works competent inspection; map and photograph fouling; identify suspected INNS; isolate and manage removal debris; apply contingency if suspected INNS found.	Low	Biosecurity Manager	Baseline survey; photographs; inspection report; logbook.
BR-02	JUB removal and towing	Biofouled JUB transfers organisms through receiving water bodies.	High	Check–Clean–Dry before removal; clearance certificate; route/destination TBC; no tow without vessel and asset declaration; contain removed debris.	Low	Vessel Master / Biosecurity Manager	JUB inspection; cleaning record; tow declaration; destination confirmation TBC.
BR-03	Plough dredging vessel / multipurpose vessel	Hull niche areas, gear or ballast transfer organisms to Port.	Medium	Pre-arrival declaration; IMO biofouling evidence; inspection history; ballast declaration; clean/inspect immersed gear; quarantine if evidence is incomplete.	Low	Vessel owner / Master	Appendix B declaration; record book extracts; clearance.
BR-04	Floating crane, tugs and	Hull fouling, sea chests, fenders, lines, anchors or	High	Pre-arrival approval; vessel-specific biofouling plan and record book; type-approved anti-fouling system;	Low	Vessel Master / Biosecurity Manager	Vessel declaration; inspection evidence; ballast records.

delivery
vessels

ballast transfer
organisms.

inspection history; ballast
compliance; trigger
inspection after arrival from
another location.

BR-05	Underwater plant, tools, lifting gear and machinery	Contaminated equipment transfers organisms or retained water between locations.	High	Check–Clean–Dry before transport and deployment; freshwater wash and/or thorough air drying; drain retained water; quarantine non-cleared assets.	Low	Site Manager / Plant Superintendent	Equipment checklist; cleaning record; quarantine release.
BR-06	Temporary and permanent piles; bankseat; scour protection; marine hard structures	New surfaces provide settlement habitat; marine-sourced materials introduce organisms.	High	Inspect before installation; monitor settlement.	Low	Procurement Manager / Site Manager	Material declarations; inspection records; monitoring log.
BR-07	Pontoon and bridge installation	Floating asset, delivery plant or attachment components introduce fouling organisms.	High	Pontoon and bridge must be manufactured and stored out of water until transferred to Fishguard, Inspect delivery plant and all immersed attachments before installation.	Low	Principal Contractor / Vessel Master	Manufacturer declaration; storage evidence; delivery declaration.

BR-08	Ballast water and sediment	Uptake, discharge or sediment transfer introduces aquatic organisms.	High	No unmanaged ballast-water discharge or sediment removal. Comply with applicable Ballast Water Convention requirements; submit ballast declaration; isolate vessel if status is unclear.	Low	Vessel Master	Ballast Water Record Book; declaration; approval.
BR-09	Rock armour and other materials	Marine-origin materials carry organisms or propagules.	Medium	Source from terrestrial quarry and maintain delivery traceability.	Low	Procurement Manager	Supplier declaration; delivery tickets.
BR-10	PPE, boots, landside plant and wash water	Retained mud, water or fouling debris transfers organisms between areas or water bodies.	Medium	Clean boots/PPE/plant before arrival and departure; use controlled wash-down; collect and dispose of debris and wash residues; prohibit direct discharge to Port.	Low	Site Manager	Induction; inspection checklist; waste record.
BR-11	Waste, removal arisings and biofouling debris	Live organisms escape during handling, storage or transport.	High	Contain wet debris in sealed, labelled containers; prevent drainage to Port; dispose under competent direction at an authorised facility; retain transfer documentation.	Low	Waste Manager / Biosecurity Manager	Waste transfer records; incident records where applicable.

7. Mandatory Biosecurity Controls

7.1 Check–Clean–Dry

1. **CHECK:** Inspect hulls, legs, pontoons, sea chests, intakes, anchors, chains, ropes, fenders, lifting gear, tools, plant tracks, PPE and material packaging for attached organisms, retained water, sediment and debris.
2. **CLEAN:** Remove visible fouling, mud, sediment and debris in a controlled area. Use freshwater washing where practicable. Capture all debris and wash residues; do not release them to the Port or another water body.
3. **DRY:** Drain all retained water. Thoroughly air-dry equipment and PPE between locations where practicable. Where drying is not practicable, the Biosecurity Manager shall define an equivalent approved containment and cleaning control.
4. **RECORD:** Complete the applicable inspection form, identify the asset and location, attach photographs where relevant, and obtain Biosecurity Manager clearance before movement.

7.2 Vessel and ballast-water assurance

Requirement	Acceptance Standard
Pre-arrival declaration	Submitted to Biosecurity Manager before mobilisation; identifies vessel, prior operating locations, idle periods, cleaning history, anti-fouling status, ballast status and intended work.
Biofouling controls	IMO-aligned ship-specific Biofouling Management Plan; Biofouling Record Book; type-approved anti-fouling system; current inspection history; contingency plan.
Ballast water and sediment	Applicable Ballast Water Convention compliance; Ballast Water Record Book or equivalent evidence; no unmanaged discharge, uptake or sediment removal in the Port.
Arrival inspection trigger	Enhanced inspection required after an asset arrives from another location, has extended inactivity, has visible fouling, has operated in a known high-risk environment, or has incomplete evidence.
Non-conformance	Assets remain quarantined. The Biosecurity Manager documents corrective action and grants written release only after evidence is complete.

7.3 Materials, debris and waste

Biofouling debris, cleaning residues and suspect material shall be contained, labelled, kept out of drains and water, and disposed of only under competent direction using an authorised route.

8. Monitoring, Recording and Reporting

Activity	Minimum Frequency	Responsible Role	Record
Baseline inspection of existing structures and JUB	Before marine mobilisation and before removal	Competent marine ecologist / Biosecurity Manager	Baseline inspection report; photographs; Appendix D logbook
Marine asset mobilisation inspection	Before first deployment	Biosecurity Manager / Vessel Master	Appendix A and B forms
Routine marine-work site check	Weekly during marine works	Biosecurity Manager or delegate	Biosecurity logbook; action tracker
Supervisor work-area check	Each shift where marine assets or equipment are in use	Supervisor	Daily site record
Trigger inspection	After idle period; arrival from another location; methodology, asset or vessel change; suspected INNS; regulator instruction	Biosecurity Manager as required	Inspection record and risk-register review
Demobilisation inspection	Before asset leaves Port of Fishguard	Biosecurity Manager / Vessel Master	Demobilisation declaration and clearance
Plan performance review	At least monthly and after any incident	Environmental Manager / Biosecurity Manager	Review minutes; revised BRAMP where needed

8.1 Biosecurity logbook requirements

- Record date, time, weather, location, activity, asset identification and inspector.
- Record inspection outcome, suspected species, photographs, cleaning method, drying status, quarantine status and clearance decision.
- Record all vessel declarations, ballast records, anti-fouling evidence, supplier declarations, waste records, toolbox talks, audits and non-conformances.
- Keep the electronic logbook in the controlled project common data environment and make it available to Stena Line, NRW and the Licensing Authority on request.
- Retain records for the period required by the marine licence or, where no period is specified, for at least six years after construction close-out.

9. Incident and Contingency Arrangements

Any suspected INNS, unexplained fouling, uncontrolled transfer, failed inspection, ballast-water concern or escape of biofouling debris is a biosecurity incident. Personnel shall stop or isolate the relevant activity or equipment where safe, preserve evidence and notify the Biosecurity Manager immediately.

Event	Immediate action	Responsibility	Escalation / record
Suspected unusual or unknown organism	Stop handling where safe; do not move asset; photograph; record precise location, asset, extent and time; protect specimen only where safe and directed.	Discovering person; Supervisor	Notify Biosecurity Manager immediately; complete Appendix C.
Suspected high-risk or non-local INNS	Isolate affected equipment, vessel area or activity; prevent water-body transfer; establish exclusion/control area.	Biosecurity Manager / Site Manager	Seek competent advice; notify NRW and Licensing Authority as applicable.
Confirmed INNS or control failure	Maintain containment; do not remove, dispose of or treat organisms unless approved or directed by competent specialist/regulator.	Biosecurity Manager / Environmental Manager	NRW incident hotline: 0300 065 3000. Licensing Authority notification route/contact: TBC.
Contaminated asset or debris	Quarantine; clean under controlled conditions; capture residues; contain and dispose through approved route.	Site Manager / Waste Manager	Update logbook, RAMS and risk register.
Restart decision	Confirm corrective actions, inspection results, advice received and revised controls.	Stena Line / Biosecurity Manager / Licensing Authority where required	No recommencement until authorised in writing by the appropriate project authority and any regulator direction is satisfied.

9.1 Investigation and corrective action

The Environmental Manager shall investigate every biosecurity incident. The investigation shall identify source, pathway, receptor, failed control, extent of potential transfer, notifications, corrective actions, required changes to RAMS and BRAMP, and restart authorisation. McLaughlin & Harvey will brief the findings to affected personnel before work resumes.

10. Training, Communication and Audit

Control	Minimum requirement	Evidence / KPI
Induction	All personnel complete marine INNS awareness, reporting, Check–Clean–Dry and quarantine briefing before access to relevant work.	100% inducted before work.
Task briefing / toolbox talk	Brief before high-risk work and weekly during marine works; include species awareness, asset controls and incident actions.	Weekly record; attendance target 100% of affected crew.
Vessel Master briefing	Brief each Master before mobilisation on declaration requirements, ballast restrictions, inspection triggers, incident route and departure clearance.	Signed vessel briefing.
RAMS assurance	Environmental Manager confirms BRAMP controls are embedded before task starts.	100% relevant RAMS reviewed before issue.
Internal audit	Audit implementation at least monthly during marine works and after any major mobilisation.	Audit score; corrective-action close-out.
Non-conformance	Issue corrective action immediately for failed controls; stop high-risk work where required.	All critical actions closed before restart; all other actions closed by agreed due date.
Management review	Review KPIs, incidents, inspections, asset changes and regulator feedback monthly.	Monthly review record.

11. Review, Variation and Close-out

This is a live plan. The Environmental Manager will review it before mobilisation, at least monthly during marine works, and immediately following a vessel or equipment change, change in material source, change in methodology, idle period, suspected or confirmed INNS detection, incident, audit non-conformance, or regulatory requirement.

- McLaughlin & Harvey will submit material proposed variations to Stena Line before implementation.
- Where a variation affects an approved licence requirement or the effectiveness of this BRAMP, Stena Line will obtain Licensing Authority agreement before implementation.
- At demobilisation, the Biosecurity Manager will complete a final inspection for all departing marine assets.
- The Environmental Manager will issue a close-out report confirming inspections, incidents, corrective actions, waste routes, outstanding matters and records location.
- Stena Line will retain the final approved BRAMP, all revisions and supporting records in accordance with Section 8.1.

Appendix A – Check–Clean–Dry Inspection Form

Field	Entry
Project / marine licence	<i>Fishguard Linkspan Replacement / TBC</i>
Asset type and ID	<i>TBC</i>
Owner / operator	<i>TBC</i>
Inspection date, time and location	<i>TBC</i>
Previous operating location / water body	<i>TBC</i>
Inspector / role	<i>TBC</i>
CHECK – hull, niches, lines, fenders, anchors, tools, PPE, retained water and sediment inspected?	<i>Yes / No – details and photographs reference: TBC</i>
CLEAN – visible fouling, sediment and debris removed in controlled area?	<i>Yes / No – method and waste container reference: TBC</i>
DRY – equipment drained and air dried, or approved equivalent control applied?	<i>Yes / No – details: TBC</i>
Suspected INNS or unusual fouling observed?	<i>Yes / No – Appendix D reference: TBC</i>
Quarantine required?	<i>Yes / No – location and controls: TBC</i>
Biosecurity Manager clearance	<i>Approved / Rejected / Conditional – name, signature and date: TBC</i>

Appendix B – Vessel and Marine Asset Declaration

Declaration item	Required entry
Vessel / asset name and ID	TBC
Owner, operator and Master	TBC
Type / intended work	TBC
Arrival date and prior operating locations	TBC
Last dry dock / hull clean / underwater inspection	TBC
Type-approved anti-fouling system details	TBC
Ship-specific Biofouling Management Plan available	Yes / No – reference: TBC
Biofouling Record Book available	Yes / No – reference: TBC
MARPOL-compliant inspection history available	Yes / No – reference: TBC
Ballast-water status and applicable convention compliance	TBC
Ballast Water Record Book available	Yes / No / Not applicable – reference: TBC
Visible fouling, retained water, sediment or biosecurity concern	TBC
Declaration by Vessel Master	I confirm the information is accurate and will notify the Biosecurity Manager of any change. Name/signature/date: TBC
Biosecurity Manager decision	Cleared / Quarantined / Further evidence required – TBC

Appendix C – INNS Sighting and Incident Record

Field	Entry
Incident / sighting reference	TBC
Date, time and reporter	TBC
Exact location / asset / coordinates where available	TBC
Activity underway	TBC
Description and estimated extent	TBC
Photographs / sample reference	TBC
Immediate stop / isolate actions	TBC
Biosecurity Manager notified	Date/time: TBC
NRW notification	Date/time and reference: TBC
Licensing Authority notification route / contact	TBC
Containment, disposal and corrective actions	TBC
Root cause and RAMS / BRAMP change	TBC
Restart authority and conditions	TBC

Appendix D – Biosecurity Logbook and Monitoring Schedule

Date	Location / asset	Activity	Check outcome	INNS observation	Action / clearance	Inspector	Record reference
TBC	TBC	Baseline / mobilisation / weekly check / trigger / demobilisation	TBC	TBC	TBC	TBC	TBC
TBC	TBC	Baseline / mobilisation / weekly check / trigger / demobilisation	TBC	TBC	TBC	TBC	TBC
TBC	TBC	Baseline / mobilisation / weekly check / trigger / demobilisation	TBC	TBC	TBC	TBC	TBC
TBC	TBC	Baseline / mobilisation / weekly check / trigger / demobilisation	TBC	TBC	TBC	TBC	TBC

Appendix E – Roles and Contact List

Organisation / role	Name	Telephone	Email	Purpose
Stena Line Ports Ltd – Licence Holder representative	TBC	TBC	TBC	Licence compliance and approvals
Principal Contractor – McLaughlin & Harvey Project Director	TBC	TBC	TBC	Construction accountability
Biosecurity Manager	TBC	TBC	TBC	Asset clearance and incident coordination
Environmental Manager	TBC	TBC	TBC	CEMP/BRAMP integration and audit
Site Manager	TBC	TBC	TBC	Site implementation
Licensing Authority notification route	TBC	TBC	TBC	Regulatory notification
Natural Resources Wales incident hotline	NRW	0300 065 3000	TBC	24-hour environmental incident reporting
Vessel owner / Master contacts	TBC	TBC	TBC	Vessel-specific assurance