

Fishguard Linkspan Replacement

Appendix C

Marine Pollution Contingency Plan



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Document Overview

This Marine Pollution Contingency Plan sets out the arrangements for preventing, escalating, containing, recovering and learning from pollution incidents on land and in Port of Fishguard waters during the Fishguard Linkspan Replacement works.

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1. Introduction

1.1 Purpose

This Marine Pollution Contingency Plan (MPCP) delivers an effective and coordinated response to pollution and environmental incidents arising from the Fishguard Linkspan Replacement works. It adopts the Source → Pathway → Receptor approach: eliminate the source, break pathways to drains, ground and Port waters and protect environmental receptors.

This MPCP;

- Applies to demolition, piling, dredging, scour protection, concrete works, pontoon and bridge installation, refuelling, plant maintenance, storage, dewatering, waste handling and all associated temporary works.
- Covers spills, releases, contaminated runoff, silty water, cementitious material, firewater, flooding and marine pollution.
- Requires immediate escalation where pollution has entered, or poses an immediate risk of entering, Port waters.
- Complements and does not replace Port of Fishguard / Stena Line emergency arrangements, approved method statements, COSHH assessments, waste controls, marine licence conditions, regulator directions or Port / Harbour Authority instructions.
- Sets mandatory minimum controls. The Principal Contractor (McLaughlin & Havey) will enhance controls where task risk assessments identify a higher risk.

1.2 Objectives

The key objectives of this MPCP is to;

- Protect life and secure the work area.
- Stop pollution at source were safe.
- Interrupt pathways by protecting drains, isolating runoff and where authorised, deploying marine containment.
- Notify the Site Manager immediately; notify the Port / Harbour Authority and NRW immediately for actual or credible marine-water impact.
- Contain, recover, classify and dispose of pollutants through authorised arrangements.
- Record the event, investigate root cause, implement corrective actions and verify close-out.

2. Interfaces, Framework and Emergency Hierarchy

This plan is informed by GPP 21 Pollution Incident Response Planning and GPP 22 Dealing with spills.

Priority	Arrangement	Requirement
1	Emergency services / life safety	Call 999 from a safe location where a spill cannot safely be contained, presents danger to life, involves fire, or requires urgent multi-agency response.
2	Port / Harbour Authority marine emergency arrangements	For pollution in, or at immediate risk of entering, Port waters, notify immediately and work under Port / Harbour Authority direction where its arrangements take precedence.
3	Regulatory response	Notify Natural Resources Wales (NRW) through the 24/7 incident hotline for pollution incidents requiring regulator notification.
4	Project arrangements	The Site Manager activates this MPCP, directs contractor actions and maintains the incident record.
5	Approved task controls	Method statements, COSHH assessments, marine licences, permits and waste controls remain fully applicable.

3. Scope of Works

The project replaces the existing temporary Jack Up Barge linkspan arrangement at Port of Fishguard with a floating pontoon linkspan. Planned activities include removal of existing linkspan components, partial buffer-dolphin demolition, temporary and permanent piling, plough dredging, scour protection, concrete works, pontoon installation and bridge installation.

4. Pollution Risk Sources and Pathways

Source / activity	Primary pathways	Critical controls	Response priority
Fuel, oils and hydraulic fluids	Ground, drains, quay edge, Port water	Bunded storage; daily plant checks; drip trays; supervised refuelling; spill kits	Stop source; protect drains and water
Plant failure or collision	Ground, drainage, direct Port release	Pre-use inspections; plant nappies; exclusion zones; recovery plan	Cordon; contain; notify
Concrete, cement and grout	Runoff, drains, Port water	Contained pours; lined washout; no wash water discharge; weather checks	Stop; isolate; recover alkaline material
Dredging and marine works	Direct Port water, suspended sediment	Approved method statement; visual monitoring; Port coordination	Stop activity; notify Port/Harbour Authority

Dewatering / contaminated water	Drains, ground, Port water	Treatment and authorised disposal route; no untreated discharge	Stop pumping; contain; sample / seek advice
Fire and firefighting runoff	Drains, ground, Port water	Fire plan; drainage protection; material inventory	Life safety; contain runoff; notify
Silt, stockpiles and flooding	Overland runoff, drains, Port water	Cover stockpiles; divert clean water; sediment controls; weather response	Stabilise; isolate runoff; recover
Waste and contaminated absorbents	Ground, drains, secondary leakage	Sealed labelled containers; designated hazardous-waste area	Segregate; remove by authorised carrier

5. Roles, Responsibilities and Incident Command

Role	Core responsibilities
Site Manager / Incident Controller	Leads emergency response; stops work; sets exclusion zone; assesses severity; coordinates notifications; liaises with Port/Harbour Authority and emergency services; authorises stand-down.
Environmental Lead	Advises on environmental risk, drainage and containment; supports regulator liaison; verifies waste route; leads investigation, corrective action and reporting.
Supervisors	Make area safe; deploy trained personnel and equipment; account for operatives; preserve evidence; confirm controls remain effective.
All Operatives and Subcontractors	Immediately stop work where safe, contain and report releases. No person shall leave a spill unattended. Follow instructions and do not enter contaminated or hazardous areas without authorisation.
Marine Coordinator / Vessel Master	Immediately reports actual or threatened marine pollution; follows Port/Harbour Authority direction; manages vessel safety and navigation interface.
Communications Lead	Controls external communications and media. Only trained, authorised spokespersons communicate externally.

5.1 Incident Command Rule

For any spill in, or credibly capable of reaching, Port waters, the Site Manager shall immediately notify the Port/Harbour Authority and NRW. The contractor shall not deploy vessels, booms or other on-water equipment unless safe and authorised or coordinated through the Port/Harbour Authority.

6. Preparedness

Throughout the work McLaughlin & Harvey will;

- Deliver environmental induction before site access. Cover STOP–CONTAIN–NOTIFY–CLEAN-UP, drain protection, spill-kit use, reporting and marine escalation.
- Deliver task-specific briefings for fuels, oils, hydraulic fluids, concrete washings, silty water, refuelling, dredging and works adjacent to water.
- Undertake and record pollution-response drills at least every six months and after material changes to risk, personnel or layout.
- Inspect spill kits, drain blockers, bunds, bowsers, plant nappies, absorbents and marine-response equipment weekly and after use.
- Maintain accessible reserve stock. Replenish every used item immediately.
- Daily weather review and agreed tidal planning before marine, concrete, dredging, dewatering and high-runoff activities.

Equipment category	Minimum provision	Location
Land spill response	Oil-only and general absorbents, granules, pads, socks, drain covers, gully guards, bags, labels, PPE and temporary bund materials	TO BE CONFIRMED BEFORE MOBILISATION
Concrete response	Drain covers, impermeable sheeting, barriers, collection containers and compatible PPE	TO BE CONFIRMED BEFORE MOBILISATION
Marine response	Flexible absorbent boom, absorbent cushions/pads, recovery bags and retrieval equipment	TO BE CONFIRMED BEFORE MOBILISATION
Waste and recovery	Sealable containers where required, hazardous-waste labels and designated secure storage	TO BE CONFIRMED BEFORE MOBILISATION

7. Plan Activation and Initial Actions

7.1 Life Safety First

If the event cannot be safely contained, involves fire, unknown hazardous substances, dangerous vapours, injury, uncontrolled release, navigation risk or a need for multi-agency response:

**EVACUATE, CALL 999 FROM A SAFE LOCATION, THEN NOTIFY THE SITE MANAGER.
DO NOT RE-ENTER UNTIL AUTHORISED.**

7.2 STOP – CONTAIN – NOTIFY – CLEAN-UP

1. **STOP:** Stop work. Stop the leak at source only if safe. Right containers, close valves, isolate plant, eliminate ignition sources and ventilate where appropriate.
2. **CONTAIN:** Establish an exclusion zone. Protect drains, manholes and quay edges. Use drip trays, bunds, absorbents, earth/sand or drain blockers. Do not wash, hose or flush pollutants away.

3. **NOTIFY:** Notify the Site Manager immediately. Notify Port/Harbour Authority and NRW immediately for Port-water impact or immediate threat. Assign one competent person to make calls while others tackle the spill.
4. **CLEAN-UP:** Recover pollutant and contaminated response material. Package, label, store and dispose through authorised waste arrangements. Do not resume work until the Incident Controller releases the area.

Trigger	Classification	Immediate action
Small contained release on impermeable land; no drain or water risk	Minor land spill	Stop, absorb, cover nearby drains, collect waste, report to Supervisor and Site Manager.
Release exceeds available first-response capacity; reaches ground/drain; unknown substance; fire risk; or cannot be safely contained	Major land spill	Cordon, stop source if safe, block drainage routes, notify Site Manager immediately; escalate to NRW where pollution has occurred or is likely.
Any pollutant in Port water, on quay edge with credible route to water, or direct discharge from plant/vessel	Marine pollution incident	Stop source, protect shoreline/drainage, notify Port/Harbour Authority and NRW immediately; follow marine emergency arrangements.
Danger to life, significant navigation risk, significant marine pollution or multi-agency requirement	Emergency services incident	Evacuate if required; call 999; notify Port/Harbour Authority, Site Manager and NRW.

8. Detailed Response Procedures

8.1 Minor Land Spill

- Wear required PPE and consult the COSHH assessment where safe to do so.
- Stop the source; isolate leaking plant or container.
- Deploy absorbent socks/pads and cover drains or manholes.
- Collect material without spreading it. Bag or containerise contaminated material.
- Notify the Site Manager, record the incident and replenish the kit before work resumes.

8.2 Major Land Spill

- Raise alarm, stop work and establish a secure exclusion zone.
- Stop source only where safe. Do not move damaged plant until leak potential is assessed.
- Protect all likely drainage routes and intercept runoff using bunds, drain covers and absorbents.
- Notify Site Manager immediately. Notify NRW where pollution has occurred, threatens controlled waters, or regulator assistance is required.
- Engage specialist spill-response support where site resources cannot safely recover the release.
- Excavate or remediate contaminated ground only under competent specialist advice.

8.3 Spill to, or Immediate Risk of Entering, Port Waters

- Stop the source and suspend the marine activity were safe.
- Notify the Port/Harbour Authority and NRW immediately. Notify 999/HM Coastguard through emergency arrangements were life, navigation, significant pollution or multi-agency response warrants escalation.
- Protect land-to-water pathways using drain covers, quay-edge barriers and absorbents.
- Do not deploy on-water containment unless safe and directed or coordinated by the Port/Harbour Authority.
- Use absorbent booms only in low-velocity water and only where deployment and retrieval can be performed safely. Place absorbent cushions/pads to recover free product; replace saturated materials promptly.
- Recover materials, maintain navigation safety and work under Port/Harbour Authority marine emergency arrangements.

8.4 Oil, Fuel and Hydraulic Release

Isolate fuel supply, shut down plant and prevent ignition. Use oil-specific absorbents for hydrocarbons. Protect drains immediately. Recover free liquid and contaminated absorbents. Treat affected ground, drainage and water as contaminated until assessed. Do not use detergents or dispersants unless expressly directed by the competent authority.

8.5 Cement, Concrete and Washout

Fresh cementitious materials and wash water are highly alkaline. Stop pour or washout, contain wet material with impermeable barriers, protect drains and prevent any release to ground or Port. Do not wash tools, chutes, pumps or mixers outside the designated contained washout area. Collect solids and liquids for authorised treatment or disposal; do not discharge washwater to drains or water.

8.6 Contaminated or Silty Water

Stop pumping or discharge immediately. Prevent further disturbance of sediment. Direct water to the approved treatment, settlement, storage or authorised off-site disposal route. Never discharge untreated silty or contaminated water to Port waters, surface drains or ground. Escalate to NRW and the Port/Harbour Authority where water has entered, or threatens to enter, Port waters.

8.7 Firewater and Runoff

Follow the site fire and evacuation plan. Prioritise life safety and emergency-service direction. Where safe, block drains and contain firewater for recovery. Provide emergency responders with the current chemical inventory and drainage plan. Treat firewater and contaminated debris as controlled waste pending classification.

8.8 Severe Weather or Flooding

Stop exposed works, secure chemicals and waste, cover stockpiles, clear approved drainage controls and divert clean water from disturbed ground. Inspect controls before and after rainfall, high winds and flood conditions. Escalate if contaminated runoff reaches or threatens Port waters.

9. Marine Containment and Recovery Principles

- The Port/Harbour Authority controls marine operational coordination and takes precedence for marine emergency arrangements.
- Use source control and shore-side pathway protection before considering on-water deployment.
- Deploy flexible absorbent booms only in suitable, low-velocity conditions and only when safe for personnel, vessels and navigation.
- Use absorbent pads or cushions to recover free product. Replace saturated materials without delay.
- Do not use unapproved dispersants, detergents or improvised floating barriers.
- Track deployed equipment, recover all materials and prevent secondary pollution.
- Package recovered pollutants, absorbents and debris as hazardous waste unless waste classification determines otherwise.

10. Notification and Communication Protocol

Event Condition	Immediate Notifications	Target Timing	Communication Lead
Minor contained land spill	Supervisor and Site Manager	Immediately	Discoverer / Supervisor
Major land spill or drainage impact	Site Manager; Environmental Lead; NRW where pollution occurred or is likely	Immediately	Site Manager
Actual or immediate-risk Port-water pollution	Site Manager; Port/Harbour Authority; NRW	Immediately	Site Manager / Marine coordinator
Life safety, navigation, fire or major multi-agency event	999; Site Manager; Port/Harbour Authority; NRW as applicable	Immediately from safe location	First safe person / Site Manager
Internal reporting	Project environmental function and client representative	Within 24 hours	Site Manager
Media or public enquiry	Authorised communications lead only	Immediately on receipt	All personnel shall refer enquiry to communication lead

10.1 Information to Provide

In the event of a spill the following is to be recorded;

- Exact location: GPS/grid reference, work area, quay/structure reference and proximity to water or drains.
- Time discovered and time released, if known.
- Substance, known hazards and COSHH reference.
- Estimated volume released and volume recovered.
- Whether drainage, surface water, Port water or ground has been affected or is threatened.
- Source, cause, actions taken, equipment deployed and current status.
- Assistance required: emergency services, Port/Harbour Authority, specialist contractor, waste recovery or regulator advice.
- Name and contact details of Incident Controller.

10.2 Controlled Contact Directory

Organisation / Purpose	Contact Details	Use
Emergency Services / HM Coastguard Escalation	999	Danger to life, fire, significant marine pollution, navigation emergency or multi-agency response.
Natural Resources Wales Incident Hotline	0300 065 3000	24/7 pollution incident reporting.
Port/Harbour Authority Emergency Contact	TO BE CONFIRMED BEFORE MOBILISATION	Immediate notification for harbour-water impact or threat.
Stena Line Client Representative	TO BE CONFIRMED BEFORE MOBILISATION	Client escalation and operational interface.
Principal Contractor Site Manager	TO BE CONFIRMED BEFORE MOBILISATION	Incident command.
Environmental Lead	TO BE CONFIRMED BEFORE MOBILISATION	Environmental assessment, regulator liaison and investigation.
Specialist Spill-Response Contractor	TO BE CONFIRMED BEFORE MOBILISATION	Escalated containment, recovery and remediation.
Licensed Waste Carrier / Facility	TO BE CONFIRMED BEFORE MOBILISATION	Removal and authorised disposal of contaminated materials.
Adjacent Properties / Downstream Users / Sensitive-Site Contacts	TO BE CONFIRMED BEFORE MOBILISATION	Use where impact or precautionary notification is required.

11. Waste Management, Remediation and Reinstatement

- Segregate, seal and label used absorbents, contaminated PPE, recovered liquids, soils, silt and debris.
- Store waste only in the designated secure hazardous-waste area.
- Use an authorised waste carrier and receiving facility. Retain waste transfer documentation and hazardous-waste consignment records as applicable.
- Do not mix incompatible wastes or dispose of contaminated materials in general skips.
- Replenish spill-response stock immediately after use and retain reserve stock.
- Undertake excavation, sampling, treatment or reinstatement only under competent environmental advice where ground or water contamination is suspected.
- Verify remediation completion through inspection, records, waste evidence and, where required, sampling or regulator/authority agreement.

12. Recording, Investigation and Corrective Action

Record every pollution incident, near miss and loss of containment. The Site Manager shall issue the internal report within an appropriate time scale and ensure the Environmental Lead investigates material incidents. The review shall identify direct cause, root cause, pathway failures, response effectiveness, waste route, corrective actions, responsible persons and due dates. The MPCP, risk register, method statements and training shall be updated where lessons require change.

Mandatory Incident Record Fields	Required Detail
Event details	Date, time, discoverer, exact location/GPS/grid/structure reference.
Release details	Substance, cause, approximate volume, COSHH reference and source.
Environmental effect	Whether ground, drainage, surface water or Port water was affected or threatened.
Response	Containment measures, notifications, equipment used, assistance required and recovery actions.
Waste and remediation	Waste description, temporary storage, carrier/facility details, remediation actions and verification.
Learning	Root cause, corrective actions, owner, completion date and effectiveness review.

13. Training, Exercise and Inspection Schedules

Activity	Frequency	Responsible role	Record
Environmental and spill-response induction	Before site access	Site Manager / Environmental Lead	Induction register
Task-specific pollution toolbox talk	Before relevant high-risk task and when conditions change	Supervisor	Toolbox-talk record
Spill-kit and drain-protection inspection	Weekly and after use	Supervisor	Inspection register
Fuel, bowser and plant leak inspection	Daily before use; each shift near water	Plant operator / Supervisor	Plant check record
Marine-response equipment readiness check	Before marine works and monthly while retained on site	Marine coordinator	Marine equipment register
Pollution incident drill	At least every six months; after major change	Site Manager / Environmental Lead	Drill report and action tracker
MPCP review	Monthly and after each incident	Site Manager / Environmental Lead	Document review record

Appendix A - Toolbox Talk

Toolbox Talk: Spill Control

What?

- Accidental releases of oils and chemicals from construction sites result in a large number of pollution incidents every year. The construction industry is one of the largest polluters of water.
- Small spills can lead to large environmental problems over time with far reaching effects. Ground contamination can lead to long term effects and can be a problem once construction work has finished. Water contamination can cause fish kill and damage plant life.
- Many spillages can be prevented. It is important that everyone on site knows how to control a spill to minimise its impact, and what preventative measures are in place on site.

Why?

- **Minimise Harm to the Environment:** Spills spread very quickly and lead to damage of the environment. A gallon of oil can cover a lake the size of 2 football pitches.
- **Avoid Prosecution:**
 - Individuals or the company could end up in court.
 - Clean-up costs can be expensive.
 - The level of fines have significantly increased.
 - Custodial sentences can be applied.
- **Reputation:** Avoid negative publicity for the company and customers. Maintain our workload and promote our capabilities.
- **The Regulators now have enhanced powers and can take immediate action.**

DO:

- ✓ **STOP WORK** and inform the Site Manager immediately when incident is discovered
- ✓ If spillage is flammable, extinguish any possible ignition sources
- ✓ Report incidents and identify the source of pollution to rectify the problem correctly and act promptly to ensure minimum impact to the environment
- ✓ **Contain the Spillage:** For spills on land, construct a bund (earth/sand) to stop it spreading
- ✓ For spills that have entered a watercourse, use booms to contain oil spills, engage specialist to remove contaminants, as required temporarily divert and contain in controlled area.
- ✓ Prevent spillage from reaching the surface/foul sewer drainage system
- ✓ Wear appropriate PPE as specified within the specific risk assessment
- ✓ Protect sensitive areas (e.g. watercourses or surface water drains – use drain covers or use earth/ sand to construct a bund)
- ✓ **Clean up the Spillage:** Use absorbent granules/pads to mop up spills. Large pools of oil or spills which cannot be absorbed should be removed by pumping by a specialist company.
- ✓ Dispose of all contaminated materials (soil/absorbent materials) correctly (those containing substances such as oil, diesel or paint will be hazardous waste) and ensure any contaminated water is taken to an appropriately licensed disposal site.
- ✓ Take action to prevent further leakage in the future and retain records of clean ups undertaken.
- ✓ Know the location of the spill kit on site and read the site Pollution Prevention Emergency Plan - a copy is displayed on the site notice board.
- ✓ **Record all Spillages:** Trends require to be captured so that lessons can be learned and measures improved. Inform SHEQ of any occurrences.



DON'T:

- ✗ Ignore it! **STOP WORK** and **ACT** immediately.
- ✗ Hide any incidents – report spills and implement control measures
- ✗ Ever hose a spill into the drainage system. Always use absorbent materials.
- ✗ Tackle spills if it's not safe to do so.

For further information and guidance, please contact the SHEQ Department.