Fishguard Linkspan Replacement

Construction Environmental Management Plan (CEMP)

McLaughlin & Harvey

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Document Status				
Issue	**Date**	**Authored by**	**Approved by**	**Comments**
01	02/09/2026	G Armstrong	J McCarey	For Submission
02	08/09/2026	G McKee	J McCarey	Dust / Surface Water Management Sections Added

Contents

Document Overview

The replacement of the Fishguard Jack Up Barge and Linkspan with a floating linkspan pontoon creates direct interfaces with port waters, active port operations, small craft, drainage infrastructure, nearby communities and sensitive ecological receptors. Pollution prevention, marine coordination and consent compliance are non-negotiable delivery conditions.

This CEMP also acts as the Code of Construction Practice, outlining our commitments into project-specific control measures, responsibilities, monitoring arrangements and procedures to ensure compliance throughout the construction phase.

- Marine-interface works require approved RAMS, applicable licence conditions, Harbour Master directions, weather and tide criteria, and task release controls.
- Every activity shall apply a source-pathway-receptor assessment before work starts and whenever conditions or methods change.
- The ferry shutdown is planned for approximately two months. Port and small-craft interfaces continue outside that shutdown and shall be actively managed through the Harbour Master and approved navigation arrangements.
- McLaughlin & Harvey shall review the CEMP monthly and after incidents, changes, instructions or repeated non-conformance.

1. Introduction

1.1 Purpose

This Construction Environmental Management Plan (CEMP) has been developed to ensure that during the construction of Fishguard Linkspan Replacement, appropriate mitigation is implemented to minimise environmental impacts that align with the Marine Construction Licence and Planning Consents conditions.

The CEMP drives delivery of environmental mitigation, pollution prevention and compliance requirements arising from the final design, planning permission, marine licence, environmental assessment and associated conditions while incorporating McLaughlin & Harvey's environmental management systems.

Specific mitigation protocols designed for Fishguard Linkspan Replacement include:

- Marine Pollution Contingency Plan
- Biosecurity Risk Assessment and Management Plan (BRAMP)
- Vessel Management Plan (VMP)
- Navigation Safety Plan (NSP)
- Protocol for Archaeological Discoveries
- Site Waste Management Plan

This CEMP should be read and adhered to alongside our developed SHEQ Project Plan, particularly the Energy and Environmental Section, which will be a live and maintained document throughout the entire construction phase.

1.2 Implementation

The implementation of the CEMP will be through Risk Assessment Method Statements (RAMS), McLaughlin & Harvey's Environmental Management System, and the direct application of Construction Environmental Management Plans (CEMP's) identified within this document.

1.3 Review and Updates

The CEMP is a live document and will be regularly reviewed and updated. There will be a review prior to the start of each new phase of construction to ensure the document remains fit for purpose.

McLaughlin & Harvey

GROUP POLICY STATEMENT

Environment & Sustainability

August 2026

IMS Ref - 1110-16

McLaughlin & Harvey is committed to sustainable practices in order to minimise our environmental impact, protect and enhance the environment and create a positive legacy for future generations.

Top Management is committed to providing leadership and ensuring the effectiveness of our Environmental Management System. In doing so, we will:

- Take overall accountability for the effectiveness of the Environmental Management System.
- Ensure that the Environmental Policy and Environmental Objectives are established, maintained and remain aligned with the strategic direction, purpose and context of the organisation.
- Integrate environmental management requirements into our business processes and decision-making activities.
- Ensure that appropriate resources, including competent personnel, technology and financial support, are available to achieve the intended outcomes of the Environmental Management System.
- Ensure that the Environmental Management System achieves its intended outcomes.
- Communicate the importance of effective environmental management and conformance with the Environmental Management System requirements throughout the organisation.
- Direct, support and empower employees and other people working on our behalf to contribute to the effectiveness of the Environmental Management System.
- Promote continual improvement and support managers and leaders in demonstrating environmental leadership within their areas of responsibility.

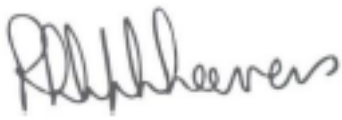
We proactively work with our colleagues, clients, supply chain and interested parties to ensure our environmental and sustainability responsibilities are managed in that everyone working with us will:

- Identify, assess and control environmental aspects, impacts, risks and opportunities through effective and sustainable measures while protecting the environment and preventing adverse environmental impacts.
- Encourage, promote and adopt environmental best practice and carbon reduction measures, efficient resource use and sustainable procurement across our operations.
- Comply with all applicable legal and other compliance obligations while continually seeking opportunities for improvement and enhanced environmental performance.
- Remain focused on technological innovations and change management.
- Meet or exceed the requirements of all stakeholders.

We aim to achieve continual improvement through:

- Consistent management reviews and regular reviews of environmental objectives and targets.
- Planning and evaluation reviews of environmental impacts and aspects and supporting requirements through competent resources.
- Holding the waste hierarchy at the heart of all that we do, by implementing best practice standards in the prevention, reduction, reuse, recycling, recovery and responsible disposal of waste, recognising waste as a valuable resource wherever practicable.
- Being conscious of the environmental conditions both within and beyond our immediate operational areas, by proactively preventing pollution, protecting the environment, responding effectively to environmental emergencies and seeking to minimise adverse impacts throughout the lifecycle of our activities where we can influence them.
- Protecting biodiversity, ecosystems, natural habitats, flora and fauna through ecological protection, appropriate land management, archaeological safeguards and initiatives that conserve and enhance the natural environment.
- Conserving natural resources through the efficient use of energy, water, raw materials and other resources while seeking opportunities to reduce consumption and environmental impact.
- Minimising and mitigating the effects of nuisance and communicating with stakeholders by seeking engagement and feedback.
- Providing support and training to our employees and supply chain to encourage and achieve best practice.
- Regularly reviewing the effectiveness and suitability of the integrated management system, including compliance with ISO 14001:2026, to ensure it continues to achieve its intended outcomes and supports continual improvement.
- Promoting efficient use of resources by challenging designers to ensure the most efficient use of energy, water or materials.
- Engaging and supporting our supply chain in carbon reduction measures and improvements.

Top Management will ensure this policy is communicated, understood, implemented, and maintained throughout the organisation and made available to employees, all businesses within the Group, our supply chain partners and other interested parties. Leadership at all levels will actively support the implementation of this policy, recognising that the commitment and professionalism of everyone working with us is essential to its success.



Philip Cheevers
McLaughlin & Harvey

15 Trench Road
Newtownabbey
County Antrim
BT36 4TY

Heathfield House
Phoenix Crescent
Strathclyde Business Park
Bellshill, ML4 3NJ

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2. Project Interfaces

Interface	Risk	Mandatory control
Ferry terminal operations	Conflict with passengers, vehicles and residual terminal activity.	Use approved logistics plan, segregated routes, delivery booking and daily interface briefing.
Port navigation and small craft	Collision, wake, restricted access and interrupted navigation.	Follow Harbour Master directions, approved Vessel Management Plan and Navigation Safety Plan; issue marine notices as required.
Marine environment	Sediment mobilisation, oil, grout, debris and underwater noise.	Use activity-specific marine RAMS, exclusion zones, pre-start checks, spill readiness and monitoring.
Drainage system	Contaminated runoff entering harbour or sewer.	Verify drainage before work; label and protect drains; isolate vulnerable inlets where safe and lawful.
Residents and businesses	Noise, vibration, dust, lighting and traffic disturbance.	Give advance notice, control hours where practicable, operate complaints procedure and maintain site standards.
Ecology	Disturbance to marine mammals, birds, otter, protected habitats and invasive non-native species.	Implement approved ecology constraints, MMMP, biosecurity plan, pre-start checks and lighting controls.
Utilities and existing structures	Damage causing pollution, service interruption or unsafe releases.	Verify services and structural constraints before intrusive work; apply permit-to-dig and approved temporary works controls.

3. Site Description and Scope

3.1 Site Characteristics and Habitat Sensitivity

The project involves Fishguard Linkspan Replacement at the ferry terminal for Stena Line. Currently, there is a temporary linkspan in place that is used for vehicles to embark / disembark the ferries, but it is nearing the end of its life. This project will replace the old linkspan with a new floating linkspan pontoon.

The Port of Fishguard is located in Pembrokeshire in Wales. The Port of Fishguard is a live marine and coastal environment. Construction planning must therefore manage interfaces with port operations, vessel movements, tidal waters, coastal weather, drainage, operational areas and neighbouring users.

Due to the setting of the project, pollution prevention measures specified in current Natural Resources Wales (NRW) and Construction Industry Research and Information Association (CIRIA) guidance will be adhered to during works to avoid pollution/run-off of any material into the marine waters. Due consideration will also be given to potential impacts on coastal vegetation, birds, benthic subtidal and intertidal ecology, fish and shellfish ecology and marine mammals.

All construction activities will be planned and delivered to avoid disturbance to designated habitats and species, following approved methodologies, marine licence conditions and environmental control measures. Our working methods, monitoring requirements and environmental procedures ensure that risks to these protected areas are minimised throughout the works.

3.2 Proposed Works

McLaughlin & Harvey, acting as Principal Contractor, will undertake the Linkspan Replacement at the Port of Fishguard. This project is designed to replace the existing linkspan bridge and jack up barge with new floating linkspan pontoon to serve the Stena Line ferry.

3.3 Scope

Work Element	Defined scope
Removal and demolition	Remove existing linkspan bridge, equipment, kiosk, lattice supports and jack-up barge; partially demolish buffer dolphins.
Marine bed works	Plough dredge loose silts and sands within the authorised footprint; redistribute material only as authorised; install approved clean-rock scour protection.
Guide piles	Install two tubular steel guide piles drilled and grouted to bedrock; install temporary piling and steel frames as designed.
Bankseat and deck	Construct replacement bankseat on six tubular piles; break out asphalt; form concrete surfacing; repair existing piled deck.
Pontoon and bridge	Tow, install, connect, test and commission the pontoon and linkspan bridge.
Support activities	Mobilisation, compound, welfare, storage, deliveries, waste, logistics, lighting, security and demobilisation.

3.4 Consenting and Licensing

Fishguard Linkspan Replacement project has successfully secured both Planning Permission and the Marine Construction Licence, which enables the progression of works. However, this is contingent upon the discharge of stipulated requirements detailed within each licence. The status and expiry of each licence are as per the table provided below.

Consents & Licences			
Consent / Licence	**Issuing Authority**	**Expiry**	**Conditions**
Planning Permission NP/25/0389/OBS	Pembrokeshire County Council	TBC (to be confirmed once final licence is issued)	As per licence
Marine Construction Licence CML2612	Natural Resources Wales	TBC (to be confirmed once final licence is issued)	As per licence

3.5 Basis

Mitigation measures to avoid and minimise potential environmental impacts associated with Fishguard Linkspan Replacement will adhere to current industry best practice.

For guidance on best practice, the CEMP refers to the Guidance for Pollution Prevention (GPPs) documents, published by UK environmental regulators. These include, but are not limited to, the following.

The site team is also strongly recommended to liaise with the Environmental Advisors within the McLaughlin & Harvey SHEQ Team for specific guidance and support.

- **GPP 1 -** Understanding your environmental responsibilities – good environmental practices
- **GPP 2 -** Above ground oil storage tanks
- **GPP 3 -** Use and design of oil separators in surface water drainage systems
- **GPP 5 -** Works and maintenance in or near water
- **GPP 6 -** Working at construction and demolition sites
- **GPP 8 -** Safe storage and disposal of used oils
- **GPP 20 -** Dewatering underground ducts and chambers
- **GPP 21 -** Pollution incident response planning
- **GPP 22 -** Dealing with spills
- **GPP 26 -** Drums and intermediate bulk containers

3.6 Site Compound, Access and Programme

The locations and extent of site compounds, welfare facilities, material laydown areas, access routes, delivery arrangements, vessel routes, working hours and programme are TBC. These details will be established through final design, liaison with Stena Line and port stakeholders, approved vessel management plans, and final consent requirements.

Topic	Mandatory control
Compound	Locate offices, welfare, storage, waste and plant only in approved areas. Keep hazardous stores and waste stores segregated and secure.
Drainage	Verify drainage before work. Identify drain type and outfall; mark surface-water drains; maintain a current drainage plan at site office and spill response points.
Welfare	Provide compliant welfare facilities. Remove wastewater through an authorised route. Do not discharge welfare effluent to ground or harbour.
Access	Use approved access routes, booking system, banksmen and vehicle segregation. Keep public and operational-port routes clear.
Deliveries	Supervise fuel, chemical and bulk-material deliveries. Confirm receiving capacity before transfer. Keep spill kit and drain covers at delivery point.
Lighting	Use directional, hooded and timed lighting. Prevent light spill to harbour, coastal habitats, woodland edges and residences.
Security	Secure fuel, chemicals, plant, waste and access points outside working hours. Inspect after severe weather or security breach.
Housekeeping	Maintain clean hardstanding, covered skips, contained stockpiles and prompt removal of litter, debris and contaminated absorbents.

4. Environmental Policy and Legal Compliance

The project will prevent pollution, protect the marine and terrestrial environment, minimise resource use and waste, and deliver demonstrable compliance. The Principal Contractor shall apply the waste hierarchy, prevent unauthorised discharges, maintain transparent records and stop work where controls fail.

4.1 Consent and Legal Register

The Environmental Lead shall maintain the live register below. This register shall identify each condition, trigger, evidence requirement, responsible person and closure status. References and conditions remain [TBC] until formally confirmed.

Requirement	Reference / condition	Construction relevance	Owner	Status
Planning permission and conditions	NP/25/0389/OBS	All land-based works, hours, noise, traffic and approved plans.	Principal Contractor	Open
Marine licence / marine permissions	CML2612	Piling, drilling, dredging, scour placement, demolition, pontoon and bridge installation.	Principal Contractor	Open
Port authority approvals / directions	[TBC as required]	Navigation, vessel movements, exclusion zones and port operational interfaces.	Marine Manager	Open
Environmental permits / discharge consents	[TBC as required]	Dewatering, trade effluent, treatment or any proposed discharge.	Environmental Lead	Open
Protected-site / ecology requirements	[TBC as required]	Marine mammals, nesting birds, otter, habitats, lighting and biosecurity.	Ecological Clerk of Works	Open
Waste carrier, facility and hazardous waste controls	[TBC as required]	Waste movement, recovery, disposal and documentation.	Waste Coordinator	Open
Relevant legislation and guidance	As identified in the outline CEMP as submitted in the licence application	Project-wide compliance.	Environmental Lead	Live

5. Role, Responsibilities and RACI

5.1 Environmental Management Structure

McLaughlin & Harvey is the Principal Contractor and remains accountable for environmental performance across all subcontractors, suppliers and marine operators. Clear definition of environmental management roles and responsibilities is crucial for effective project implementation. McLaughlin & Harvey's Environmental Manager will work closely with the Site Manager and team, supervising works, contributing to RAMS, and ensuring the diligent implementation of the CEMP and consent conditions.

Communication with the Client, and their appointed independent Environmental Clerk of Works (ECoW) will be maintained through regular and formal channels. This includes providing project progress reports, especially regarding environmentally sensitive activities like piling or abnormal transport, to the Project Manager prior to client liaison meetings.

A list of key personnel and their roles and responsibilities can be found below which will be updated as necessary throughout the project. All key personnel receive appropriate and relevant training prior to commencing their allocated roles.

5.1.1 Client – Stena Line

Responsibility

Stena Line is the Client commissioning the works and is responsible for appointing the Principal Contractor and Principal Designer for the contract and adhering to the following environmental duties as described within the CEMP.

Specific Environmental Duties

During construction, Stena Line has responsibility for delivering the commitments defined in the CEMP. Stena line shall act as the primary contact with all statutory bodies during construction.

Stena Line shall regularly monitor works on-site and ensure that all conditions, committed mitigation and identified best practice are delivered in accordance with the CEMP.

Stena Line has the authority to halt any activity where environmental commitments are not being successfully delivered, where legal requirements are being breached or where there is a significant risk to the environment.

Stena Line shall report any environmental incidences to the consenting body within 24 hours. All instances of suspected environmental crime shall be reported immediately to the Police.

Stena Line, as the client, shall provide the name of a key person within their organisation, who shall liaise directly with the contractor and relay relevant information to Stena Line.

Stena Line's key person shall be supported by Stena Lines's consultant engineer and environmental consultant who shall act as third-party reviewers for Stena Line with other parties inputting as required. This support shall include an Environmental Clerk of Works (ECoW) who shall audit the contractor's environmental compliance and report to the Stena Line Client Team.

Qualifications
Stena Line representatives should have an appropriate understanding of the licences, legal requirements, and the CEMP.

5.1.2 Stena Line Appointed ECoW

Roles and responsibilities include
The Association of Environmental and Ecological Clerks of Works (AEECW) defines the Environmental Clerk of Works (ECoW) as:

"An environmental or construction professional with direct responsibility for monitoring compliance with planning consents, environmental permits, legislation and mitigation."

The ECoW shall:

- Have professional membership and thereby obliged to follow a professional code of conduct;
- Have the relevant construction and natural environment qualifications and experience;
- Be able to influence decisions on site (by educating the relevant site staff; and
- Be multi-disciplinary.

The specific responsibilities of the Stena Line ECoW are:

- Act as direct liaison between the Stena Line project team and the consenting bodies / regulators;
- Undertake environmental audits of the construction works to ensure the contractor is adhering to the CEM Plan and identify improvements if necessary. The audits will be undertaken on a weekly basis when construction activities are identified as having a higher environmental risk;
- The authorisation to halt works if necessary;
- Provide reports to Stena Line on the findings of each audit using a standard form and a traffic light prioritisation system. The reports shall document the advice given, the actions taken and the ultimate outcome in relation to legislative or other requirements; and
- In the event of any environmental or ecological issues identified provide advice as required to the Stena Line client team.

5.1.3 McLaughlin & Harvey Contract Manager

Responsibility
The Operations/Contracts Manager's responsibilities are to:

- Provide adequate resources for effective operation and delivery of the project, ensuring all Managers and Personnel within their area of responsibility are competent and adequately trained

- Carries out Leadership visits to site, monitoring action to be taken and promoting best practice
- Assist in the development of energy and environment strategies and action plans encompassing Company and Project objectives
- Ensures all Personnel, Third Party Personnel, Contractors and their Employees are made aware of environmental policies and action plans which have been put in place
- Ensures records of continuing professional development activities are compiled and issued to the designated Training Coordinator for review
- Monitors project inspections, reviews and audits of all strategies and action plans carried out within their area of responsibility, providing appropriate documented feedback to the Board of Directors as applicable
- Ensures the Environmental Plan is reviewed and approved along with associated workplace specific hazard identification and risk assessments prior to works commencing
- Monitors the performance of Sub-Contractors and feeds back to the Construction Director, Group SHEQ Director and Commercial Director as appropriate
- Ensures appropriate safety equipment and necessary welfare facilities are provided and maintained for the project

5.1.4 McLaughlin & Harvey Site Manager

Responsibility
To act as the main point of contact on site, on behalf McLaughlin & Harvey. Specific Environmental Duties include:

- Ensures Environmental responsibilities defined for the project are correctly assigned and carried out on site
- Allocates the duties to the appropriate supervisor(s) or foreman to ensure that a workplace specific statement of the named manager's responsibilities is produced and issued
- Ensures work is carried out within the project environmental objectives and action plans
- Ensures Personnel, Third Party Personnel, Contractors and their Employees are made aware of the Environmental policies and plan for the project which have been put in place
- Provides adequate resources for effective operation and delivery of the project, ensuring all Managers and Personnel within their area of responsibility are competent and adequately trained
- Ensures records of all training received and other training development activities are compiled and issued to the designated Training Co-ordinator for review
- Reviews Supervisors and Foremen's SHEQ performance in respect of the responsibilities assigned to them
- Leads on taking action following project inspections, reviews and audits of all strategies and plans within their areas of responsibility, providing appropriate documented feedback to the Group Head of SHEQ and Operations Manager
- Ensures all project incidents, dangerous occurrences, near misses and injury events are reported via the 'Accident/Incident Notification' (IMS Doc Ref. 2062) or 'Safety & Environmental Observation Report (SOR)' (IMS Doc Ref. 1509) for nonpollution event incidents, in addition to pollution incidents, and are fully investigated
- Produces the project Environmental plan prior to works commencing

- Develops Impacts and Aspects Register
- Oversees all necessary project site specific inductions to be carried out and documented
- Ensures appropriate safety equipment and necessary welfare facilities are
- provided and maintained for the project
- Monitors the performance of Sub-Contractors and feeds back to Senior Management
- Ensures that all personnel are adequately trained and instructed in relation to their duties

5.1.5 McLH Design Manager

Responsibility
Environmental Responsibilities include:

- Coordinates design activities for the project
- Investigates the elimination of waste and quality defects, instigating design change where practicable
- Inspects work performed to ensure it is in compliance with the design
- Evaluates and considers energy performance opportunities in all designs and processes

5.1.6 Employees and Sub-Contractor

Responsibility

- Can demonstrate awareness of Environmental impacts in relation to their roles and Company Policies
- Participates in inductions, training and job specific training
- Provides essential feedback on Project and Business Operations for continual improvement
- Ability to carry out the work task assigned competently without taking unnecessary risk
- Ability to communicate if they do not understand or are not capable of carrying out the task
- Exercises reasonable care at all times in the work area towards themselves and others
- Uses only the safety equipment provided
- Works in accordance with Company procedures
- Avoids violations which could result in injury to themselves or others
- Complies with management requests and instructions on Environmental matters
- Reports and does not operate defective equipment
- Does not intentionally damage or misuse equipment
- Report any accidents, incidents, dangerous occurrences or near misses as soon as possible to the Supervisor/Project/Site Manager

5.1.7 McLH Group SHEQ Director

Responsibility

- Manages documentation related to Environmental aspects of the company Integrated Management System and responsible for approving changes for document control
- Promotes environmental, sustainability and energy efficiency initiatives and strategy
- Reviews audit findings and reports root cause analysis, corrective and preventive actions to Project Management and the Board for continuous improvement development

- Monitors and reports on non-conformances for lessons learnt analysis;
- Monitors the performance of Sub-Contractors and reports to the Senior Management Team as appropriate
- Reports on Project and Business Energy and Site Waste Management Data for continuous improvement development
- Reviews the functionality and relevance of all Environmental and Energy Management documentation within the IMS to ensure it meets ISO 14001 and ISO 50001, Business, Legal and Client Requirements
- Provides SHEQ advisory support to the Project
- Contributes to the IMS audit schedule and ensures competent auditors are assigned to undertake the required project audits

5.1.8 McLH Group Environmental Manager

Responsibility

- Manages and monitors the company Integrated Management System
- Promotes best practice and reports significant risks to the business through IMS Reviews on the project
- Reviews the functionality and relevance of all documentation within the IMS to ensure it meets ISO 14001, ISO 50001, Business, Legal and Client Requirements
- Contributes to the IMS audit schedule and ensures competent auditors are assigned to undertake the required project and business audits
- Provides Environmental advisory support to the Project
- Continually improves the management system in relation to project and business audit findings, best practice communication, lessons learnt and continual improvement analysis

5.1.9 McLH Environmental Advisor

Responsibility

- Participates in Environmental Aspects and Impacts evaluation, providing information on activities as required
- Develops Project procedures to control job related environmental impacts
- Ensures all Employees, Contractors and Sub-Contractors are aware of and compliant with procedures relevant to own area of responsibility
- Communicates Quality, Environmental and Energy Management Policies to Employees, Contractors and Sub-Contractors
- Promotes good practice in the workplace
- Acts as first point of contact for advice during environmental incidents and emergencies, coordinating with regulators / Scottish Environmental Protection Agency (SEPA) as required
- Performs internal project audits and inspections as per audit schedule and Client specifications
- Hosts external project audits, providing guidance to the external auditors where required
- Feeds back audit findings, good practice, significant risks and positive findings to Project Manager and Senior Management as appropriate
- Provides advisory support to the Project as and when required

- Liaises with the Project Manager to ensure appropriate Corrective and Preventive actions are identified and implemented
- Investigate significant incidents (RIDDOR) and develops root cause analysis with improvement recommendations
- Identifies common areas of non-conformance across the business and promotes good practice across the business

Details of Key project Personnel

Role	Name	Phone Number
Stena Line Key Contact	TBC	TBC
McLH Contracts Manager	TBC	TBC
McLH Site Manager	TBC	TBC
McLH Environmental Advisor	TBC	TBC
McLH Design Manager	TBC	TBC
Marine Manager / Marine Contractor Lead	TBC	TBC
Harbour Master / Port Representative	TBC	TBC

5.1.10 RACI

Activity	Stena	PC Director	Construction Manager	Environmental Lead	Marine Manager	Supervisor
Approve resources and environmental objectives	A	R	C	C	C	I
Maintain CEMP, legal register and audits	I	A	C	R	C	I
Approve task RAMS and permits	I	A	R	C	C	C
Control marine operations and navigation	C	A	C	C	R	I
Daily environmental checks	I	I	A	C	C	R
Incident response and reporting	I	A	R	C	C	R
Regulator liaison	C	A	C	R	C	I

R = Responsible; A = Accountable; C = Consulted; I = Informed. The Principal Contractor remains accountable for subcontractor performance.

6. Communication, Engagement and Complaints

- The Construction Manager shall chair a weekly coordination meeting covering programme, marine interface, environmental risks, actions, complaints and forthcoming high-risk work.
- The Environmental Lead shall issue a monthly CEMP performance report to Stena Line and retain minutes, monitoring data, inspections and action status.
- The Marine Manager shall coordinate vessel movements, restricted areas, tow operations and notices with the Harbour Master.
- The site shall display the project contact number [TBC], approved working hours [TBC] and emergency reporting instruction.
- McLaughlin & Harvey shall acknowledge complaints, investigate and implement controls immediately, and provide a substantive response within an appropriate expediency commensurate with the severity of the complaint or a written progress update.

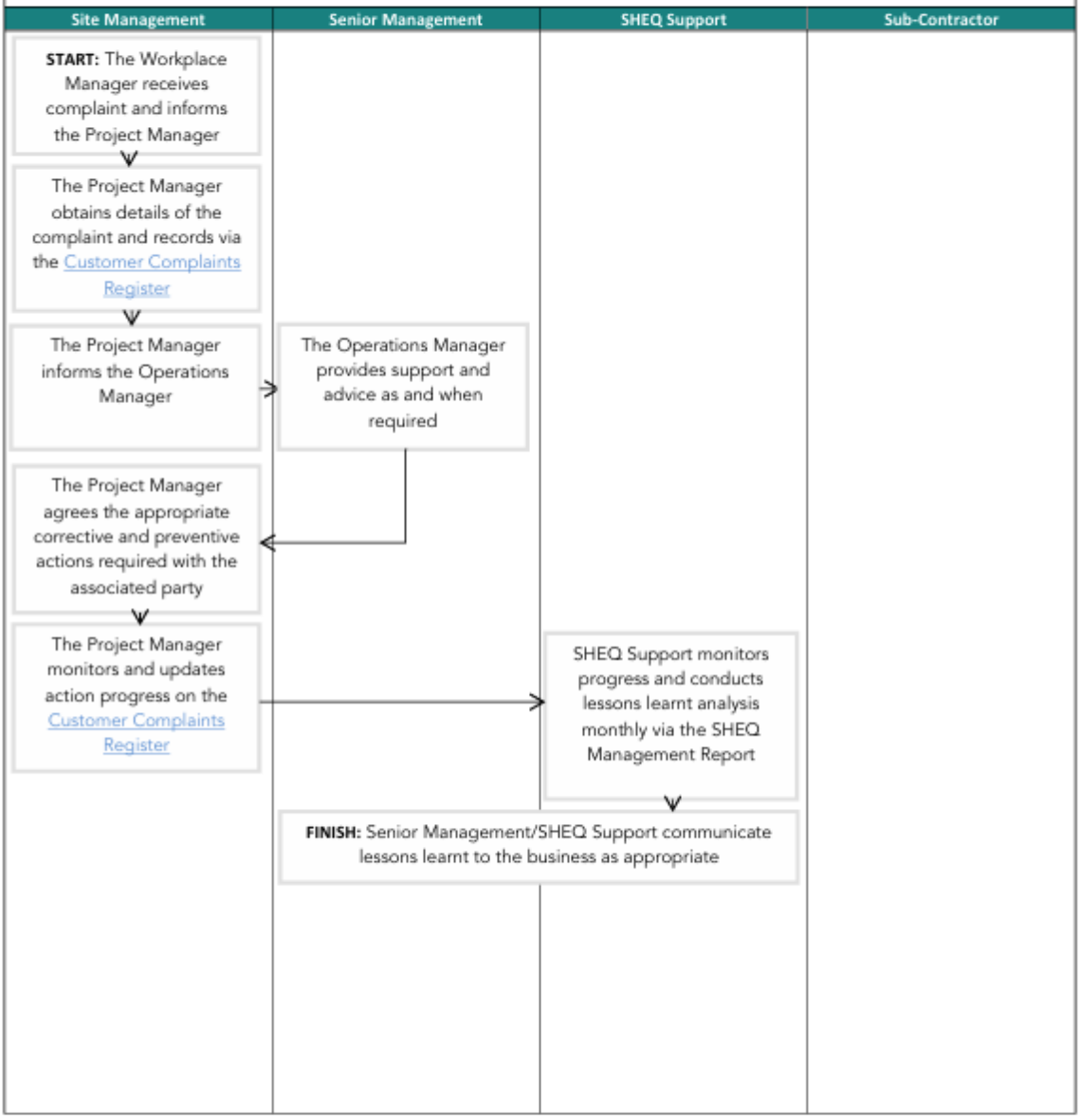
6.1 Complaints Procedure

- Receive, log and acknowledge every complaint, as required.
- Assess the issue, inspect the relevant activity and implement immediate controls where required.
- Provide a substantive response within an appropriate timescale or issue a written progress update where investigation continues.
- Record cause, corrective action, responsible person, close-out evidence and response date.
- Escalate recurring or material complaints to the Construction Manager and monthly CEMP review.

Below is the McLaughlin & Havey Complaints procedure:

McLaughlin & Harvey	IMS Doc Ref No:	PO/2/3/3+BO/8-1267
	Process Objective:	To review customer perception on project delivery; capture lessons learnt and take appropriate actions to maintain strong client relationships and continually improve service delivery.
	Process Owner	Operations

Customer Complaints



7. Dust Management

7.1 Introduction

Effective control of noise, vibration, and dust is essential to minimise potential impacts on both human and ecological receptors. Key receptors include:

- Disturbance to benthic invertebrates, fish, marine mammals, and diving seabirds resulting from underwater acoustic emissions and vibration.
- Airborne noise and visual disturbance to coastal and intertidal waterbirds during construction activities near the shoreline.

McLaughlin & Harvey will adopt best practicable means (BPM) to minimise these impacts, including careful planning, equipment selection, and sequencing of works.

All works will comply with the following relevant legislation, standards, and guidance:

- Clean Air Strategy (Defra, 2019)
- National Planning Policy Framework (MHCLG, 2019)
- National Policy Statement for Ports (NPSfP) (DfT, 2012)
- UK Marine Policy Statement (HM Government, 2011)
- Institute of Air Quality Management (IAQM) and Environmental Protection UK (EPUK), Guidance on Land-Use Planning and Development Control: Planning for Air Quality (Moorcroft & Barrowcliffe, 2017)
- Air Quality Standards Regulations (2016, as amended)
- IAQM Guidance on the Assessment of Dust from Demolition and Construction (2014)

7.2 Key Ecological Conditions

Marine mammals – harbour porpoise
Presence: The works are within the West Wales Marine SAC, designated for harbour porpoise; the wider assessment area also includes the Celtic and Irish Seas Marine Mammal Management Unit and North Anglesey Marine SAC population connection.

Protection status: Internationally protected SAC feature; harbour porpoise impacts must be assessed in accordance with NRW's underwater-noise guidance.

Potential impacts: Piling and other underwater construction noise could cause behavioural disturbance, auditory injury or, at worst, mortality risk; dredging and vessel activity may also cause disturbance.

Key controls: Vibration / Impact piling 20-minute soft start; Marine Mammal Observer mitigation zone; 30-minute pre-piling visual watch; Marine Mammal Protection/Mitigation Plan; vessel-management and navigation-safety measures.

Marine mammals – grey seal and common dolphin
Presence: Grey seal and common dolphin are relevant marine mammal receptors required within the assessment scope.

Protection status: Grey seal is to be assessed at OSPAR Region III scale, encompassing Welsh sites; common dolphin is specifically requested by NRW for inclusion.

Potential impacts: Underwater noise, disturbance from dredging/piling and increased vessel movement; risk pathways relating to injury or mortality require assessment at an appropriate population scale.

Breeding birds – black guillemot
Presence: Black guillemot is recorded as a former breeding species in the harbour, with chicks confirming successful breeding over several years.

Protection status: All wild birds, active nests and eggs are protected under the Wildlife and Countryside Act 1981; black guillemot is also listed as BoCCW Amber.

Potential impacts: Disturbance, loss/damage of nesting opportunities in quay walls or built structures, and construction activity close to nest sites.

Key controls: Pre-construction nesting-bird checks; avoid works to potential nesting features during the breeding season unless a competent ecologist confirms absence.

Breeding birds – built-structure nesting species
Presence: Previous surveys recorded five pairs of feral pigeon under/adjacent to the linkspan and four house martin nests in the railway-station building; house sparrow and starling may also nest within site buildings.

Protection status: All active nests and eggs are legally protected; house sparrow and starling are BoCCW Red List species.

Potential impacts: Demolition, alteration or occupation of buildings/quay structures could destroy or disturb active nests.

Key controls: Programme relevant works outside the bird breeding season or undertake an ecologist's pre-start nest inspection; if clear, remove/dismantle nest features within 48 hours.

Wintering and passage birds
Presence: The harbour supports gulls, cormorant, heron, turnstone, oystercatcher and curlew; broader WeBS data records 41 species, including Red- and Amber-listed birds. Intertidal mud/sand outside the main works area is a foraging resource.

Protection status: Several species are BoCCW Red/Amber; all wild birds receive baseline legal protection.

Potential impacts: Temporary disturbance from noise, lighting, vessel movements and construction near roosting/foraging areas; indirect effects from sediment mobilisation or pollution.

Key controls: Maintain pollution prevention and sediment controls; minimise unnecessary lighting and disturbance around harbour edge/intertidal areas.

Otter
Presence: No signs were found during the January survey, but otters are resident locally and have been recorded in the harbour and nearby watercourses. Harbour water is part of the local population's wider foraging territory.

Protection status: Fully protected under the Wildlife and Countryside Act and as a European Protected Species; also a Section 7 Species of Principal Importance in Wales.

Potential impacts: Disturbance to foraging animals; potential effects on sheltering habitat in quieter rock-armour areas; pollution and reduced water quality.

Key controls: Pre-start checks of harbour-side work areas; protect rock armour/refuge features where practicable; implement pollution prevention and maintain water-quality controls.

Bats
Presence: Seven bat species are recorded within 2 km. Buildings and the vegetated rockface/woodland edge have potential value, particularly the two older warehouse buildings outside the immediate development footprint.

Protection status: All bats and roosts are European Protected Species and receive full protection; several locally recorded species are Section 7 Species of Principal Importance.

Potential impacts: Damage or disturbance to roosts, lighting effects on commuting/foraging routes, and construction noise close to the woodland edge.

Key controls: Further surveys before works affecting any building with roost potential; avoid light spill onto woodland edge, scrub and coastal heath; retain dark vegetated corridors.

The following mitigation measures will be implemented to minimise these effects, following best practice guidance for marine construction and in consultation with relevant regulatory bodies.

7.3 Noise, Dust & Vibration Mitigation Methods

Underwater Noise
Please refer to Appendix G – Marine Mammal Mitigation Protocol. Construction activities will primarily be undertaken during daytime hours to minimise noise disturbance to nearby receptors. Any works proposed outside working hours, or where noise levels are anticipated to exceed the thresholds identified within the Environmental Statement, will be carried out in accordance with the Control of Pollution Act 1974. This ensures that all out-of-hours or higher-noise activities are subject to prior agreement and appropriate control measures approved by the relevant local authority.

In the event of noise levels exceeding the permitted criteria, an investigation will be undertaken to determine whether the source is associated with construction activities. Where confirmed, targeted mitigation will be identified and implemented to prevent recurrence.

For in-water works, additional measures will be implemented to protect marine receptors from underwater noise and vibration. These include:

- Adopting the Best Available Techniques (BAT), prioritising lower-impact methods.

Air noise and vibration
Construction activities will primarily be undertaken during the agreed working periods to minimise noise disturbance to nearby receptors. Any works proposed outside standard daytime periods, or where noise levels are anticipated to exceed the thresholds identified within the Environmental Statement, in accordance with the Control of Pollution Act 1974.

This process will ensure that all out-of-hours or higher-noise activities are subject to appropriate assessment, control measures, and prior agreement with the relevant local authority.

In the event of noise levels exceeding the permitted criteria we will carry out an investigation to ascertain whether the noise source is associated with the construction operations, and if so the reason behind the breach. This will allow additional targeted mitigation to be identified and implemented.

If a noise complaint is received by a member of public or local business it will be dealt with in accordance to the Noise Complaints Investigation and Management Process.

Dust Concerns
Dust, similar to noise and vibration, can impact human and ecological receptors, it can become a nuisance and potentially a health hazard, especially in dry and windy conditions. The results of the dust risk assessment shows there is a low risk of causing dust impact during construction. Areas of low concern are listed below:

- Site clearance
- Demolition Works

Dust Prevention
All vehicles entering and leaving the site with potentially dust containing material will be covered to prevent escape of dust on the public roads. Delivery vehicles will also follow appropriate route as detailed in our Traffic Management Plan.

The movement of dusty materials, such as soil, sand or gravel, will be appropriately planned to minimise the number of times dust emitting material is moved. Any materials with the potential to give rise to dust will be kept moist, to avoid dust airing until they have been suitably covered. McLaughlin & Harvey site engineer will also take note of weather forecasts to ensure that measures are in place prior to periods of dry and windy weather.

Dust Monitoring
Qualitative monitoring checks of visible dust emissions and surface soiling will be conducted once each working day within the vicinity of the site boundary (internal and external) with the result of the inspection being recorded.

Dust Mitigation
If monitoring identifies an issue, steps will be taken to rectify the situation. This may include the dampening or covering of dust sources and the use of road sweepers to minimise the spread of dust through the site, and onto the public road.

We will also ensure that any dust complaints will be investigated, and appropriate remedial action taken to reduce emission in a timely manner, and record the measure taken.

7.4 Construction Plant & Equipment

The following table outlines the principal construction plant and equipment anticipated to be used during the works. Plant has been categorised into landside and marine-based operations to reflect their respective areas of use and potential environmental interface.

All plant and equipment will be maintained in accordance with manufacturer's recommendations and site environmental requirements to minimise the risk of pollution, noise, and vibration.

Regular inspections will be undertaken to ensure compliance with the site's Pollution Prevention Plan and to verify that all equipment is fitted with appropriate emission and noise control measures.

Category	Plant / Equipment	Primary Use / Description	Environmental Controls / Mitigation Measures
Key Marine Plant	**Crane Barge**	Lifting of existing linkspan. Working platform for marine operations and placement of scour protection.	Fitted with spill kits; hydraulic systems inspected regularly to prevent leaks.
	Tug Boats / Supply Barges / Survey Vessels / Multi Cat Vessel	Manoeuvring of barge and marine plant; positioning of floating equipment. Plough Dredging.	Low-sulphur marine diesel used; engines maintained to reduce emissions.
Key Landside Plant	**Mobile Crane / Crawler Crane**	Lifting of materials on breakwater.	Refuelling in designated bunded areas; plant nappies beneath static plant.
	Piling Plant – Crane suspended Vibratory / Impact Hammers	Installation of Guide Piles / Temporary Works	Biodegradable hydraulic oil where practicable; spill kits located nearby.
	Piling Plant – Rotary Piling Rig	Installation of Permanente guide piles	Biodegradable hydraulic oil where practicable; spill kits located nearby.
	Long Reach Excavator	Placing of Scour Protection.	Biodegradable hydraulic oil where practicable; spill kits located nearby.
	Telehandler	Movement of materials and equipment around compound and laydown areas.	Daily plant inspections; adherence to dust suppression measures.
	MEWP (Mobile Elevated Work Platform)	Access for high-level installation works.	Operated on level ground; drip trays used during maintenance.
	Excavator	Localised excavation and small-scale civil works. Stockpiling of scour protection.	Biodegradable hydraulic oil where practicable; spill kits located nearby.
	Excavator with Breaker Attachment	Breaking structural elements if required for temporary works.	Noise reduction measures and mufflers fitted; operated within agreed hours.

8. Surface Water Management

8.1 Site Context and Sensitive Receptors

The works are located at Stena Line's Fishguard ferry terminal in Goodwick/Fishguard, Pembrokeshire. The work footprint includes the harbour, foreshore, existing linkspan and adjoining hinterland. The oCEMP identifies two surface-water drainage outfalls at the southern harbour; their exact routes, ownership, condition and receiving environment require verification before works start.

Receptor or feature	Sensitivity and management requirement
Fishguard harbour and coastal waters	Primary receiving waters. Prevent all releases of silt, hydrocarbons, concrete, grout, chemicals and waste.
Surface-water drainage network	Potential pathway to harbour waters. Survey, mark, protect and inspect all gullies, channels, outfalls and drainage connections.
Existing linkspan, quay, foreshore and marine work areas	High-risk areas for demolition debris, sediment mobilisation, tidal inundation and accidental releases.
Construction compounds, access routes and hardstanding	Manage runoff, plant leakage and sediment track-out before material reaches drains or harbour waters.
Southern harbour outfalls	Exact locations, discharge routes, condition, protection measures and access arrangements TBC.

8.2 Responsibilities

Role	Core responsibilities
Client Representative	Ensure adequate resources, approve material changes to this Plan and receive significant incident reports.
Principal Contractor / Project Manager	Implement this Plan; appoint competent personnel; secure required consents; coordinate subcontractors; stop work where controls fail.
Site Manager	Direct daily delivery; confirm pre-start controls; coordinate weather and tidal planning; maintain site drainage controls and records.
Environmental Manager	Undertake weekly inspections; review method statements; audit compliance; manage environmental records; lead incident investigation and regulator liaison.
Site Supervisors	Complete daily checks; brief operatives; inspect controls before high-risk work; immediately escalate defects, spills and unauthorised discharges.
Operatives and Subcontractors	Follow inductions, task briefings and permits; protect drains; use spill equipment; stop work and report pollution risks immediately.

8.3 Drainage and Water-Management Principles

- Complete a pre-start drainage survey before mobilisation. Identify, trace where practicable, photograph and mark all drains, gullies, channels, outfalls, interceptors and discharge points.
- Issue a marked drainage plan before works commence. Display controlled copies in the site office, welfare area and emergency response information point.
- Segregate clean water from dirty water at source. Divert clean runoff away from exposed ground, demolition areas, dredging support areas, excavations, stockpiles and material storage.
- Protect gullies and drainage entries within or downstream of work areas using suitable temporary controls, maintained to prevent blockage or bypass.
- Contain dirty water within controlled work areas and route it to agreed treatment, reuse, authorised sewer discharge or off-site disposal.
- Keep access routes clean. Remove mud, sediment and debris before it reaches drains, harbour edges or public areas.
- Do not alter, connect to, block or discharge to drainage infrastructure without approval under the agreed drainage plan.

The Principal Contractor must not start demolition, dredging, excavation, dewatering, concrete works or refuelling until the drainage survey, marked drainage plan, discharge arrangements and relevant consents are complete.

8.4 Principal Water Risks

Risk source	Potential pollutant or effect	Primary pathway
Rainfall runoff	Silt, debris and pollutants mobilised from work areas	Gullies, drains, harbour edge and coastal waters
Demolition, dredging and excavations	Suspended sediment, concrete fragments and disturbed material	Surface runoff, tidal water and direct marine release
Plant, refuelling and fuel storage	Diesel, oils, hydraulic fluid and lubricants	Leaks, spills, drainage network and harbour waters
Concrete, grout and cementitious repairs.	Highly alkaline washout water, fresh concrete and grout residues	Runoff, drains, tidal waters and marine environment. Concreting of Guide Pile
Tidal and flood conditions	Inundation, control failure, debris migration and release of stored materials	Harbour waters, drainage network and work areas

8.5 Water Pollution Prevention Controls

Risk or activity	Prevention controls	Monitoring	Response
Rainfall runoff and exposed areas	Phase works to minimise exposed surfaces; divert clean water; use temporary barriers, silt controls and contained drainage; cover vulnerable materials and stockpiles.	Daily supervisor checks; additional checks before and after forecast severe weather.	Stop runoff reaching drains or harbour; reinforce controls; remove accumulated sediment; suspend exposed-ground activity where controls cannot contain runoff.
Demolition and deck works	Protect nearby drains; contain debris; maintain tidy work faces; prevent wash water and fines leaving the work area.	Inspect drain protection and work perimeter before each shift and after rainfall.	Stop work if debris or sediment escapes; contain, recover and dispose of material; inspect downstream drainage and harbour edge.
Dredging, scour protection and in-water works	Use approved task method statements; minimise sediment disturbance; maintain containment and recovery equipment appropriate to the activity; prevent release of fuels, wastes and cementitious materials.	Supervisor visual checks during operations and tidal changes; record visible sediment releases or control failures.	Stop the activity on uncontrolled sediment release; contain where practicable; notify the Environmental Manager and follow the incident procedure.
Excavations and dewatering	Keep clean water out; form controlled collection points; treat retained water before any authorised discharge; protect pump intakes from disturbing settled sediment.	Inspect water clarity, containment, pumps, hoses and treatment equipment before and during pumping.	Stop pumping if water is silty, oily, contaminated or discharge conditions are not met; isolate and arrange treatment, reuse or authorised off-site disposal.

Hydrocarbons and plant leakage	Use maintained plant; conduct pre-use checks; position drip trays under stationary plant and fluid-transfer points; retain spill kits at high-risk locations.	Daily plant checks and inspection of storage/refuelling areas.	Stop source, isolate drains, deploy spill controls, recover contaminated materials and report immediately.
Concrete, grout and washout	Use sealed formwork and containment; establish lined washout; keep concrete operations away from drainage entries and tidal influence; do not pour during conditions that defeat containment.	Supervisor check before pour; inspect shutters, washout area and drainage protection throughout the activity.	Stop pour or washout activity on leakage; contain residues; recover contaminated material and prevent entry to drains or harbour waters.
Tidal, flood and severe weather conditions	Plan marine and harbour-edge works around agreed tidal windows; secure materials, plant and pollution controls; keep emergency equipment accessible.	Monitor weather and tidal information before shifts and during changing conditions.	Suspend high-risk work; secure plant and materials; protect or remove vulnerable controls; restart only when the Site Manager confirms controls are effective.

8.6 Dewatering and Discharge Controls

No silty or contaminated water may be discharged untreated. This prohibition applies to surface water, harbour waters, drainage systems, sewers and land.

Assess each proposed discharge before pumping starts. Confirm the water source, likely contaminants, proposed treatment, destination, monitoring arrangements and emergency shut-off method.

Use settlement, filtration, silt bags, tanks or other suitable treatment controls selected for the water quality and agreed discharge route.

Collect and contain water containing hydrocarbons, cementitious material, chemicals or other contaminants for authorised off-site disposal unless an approved treatment and discharge arrangement is in place.

Retain written consent, permit or approval evidence in the site environmental file and brief relevant operatives on its conditions.

Do not discharge concrete washout, grout water, oily water, silty water or water of unknown

8.7 Refuelling, Fuel Storage and Concrete Washout

Activity	Mandatory controls
Fuel and oil storage	Store fuels, oils and chemicals in designated secure areas at least 10 m from waterbodies and surface-water drains. Provide impervious secondary containment with capacity of 110% of the stored volume. Use bunded pallets, drip trays and clearly labelled containers.
Refuelling	Refuel only in designated areas on stable ground. Use trained operatives, supervised deliveries, drip trays at transfer points and immediately available spill kits. Do not leave refuelling unattended. Switch off plant before refuelling.
Plant maintenance	Undertake routine maintenance away from drains and water. Remove leaking plant from service until repaired. Store waste oils and contaminated absorbents in suitable contained receptacles.
Concrete and grout	Contain all pours, repairs and grouting. Seal shutters and formwork to prevent leakage to harbour waters. Maintain direct supervision of concrete operations near water.
Concrete washout	Use a designated lined and contained washout facility, located away from drainage entries and tidal influence. Collect wash water and residues for authorised treatment or disposal. Never wash vehicles, pumps, chutes or tools to ground, drains or harbour waters.

8.8 Inspections, Weather Monitoring and Records

Requirement	Frequency	Record
Supervisor inspection of drainage controls, work areas, plant, spill kits and pollution risks	Daily and before high-risk activities	Daily environmental check
Site Manager inspection	Weekly	Weekly inspection report and corrective-action log
Weather and tidal review for harbour-edge, in-water, dewatering and concrete activities	Before each relevant shift and during changing conditions	Site diary / task briefing record
Plan review	Monthly and after incidents, design changes, new discharge arrangements or material changes to work methods	CEMP review record and revised Plan

- Maintain the marked drainage plan, pre-start survey record, inspection checklists, photographs, permits, consent evidence, discharge records, incident forms and training/toolbox-talk records.
- Record defects, assign corrective actions, set completion dates and verify close-out.
- Make records available to the client and regulators on request.

8.9 Pollution Incident and Stop-Work Procedure

Please refer to Appendix C Marine Pollution Contingency Plan for coastal waters.

9. Pollution Prevention, Drainage, Dewatering and Concrete/Grout

Please refer to;

Appendix C – Marine Pollution Contingency Protocol (MPMP)

10. Marine Works, Navigation and Ecology/Biosecurity

Please refer to;

Appendix D - for the Navigation Safety Plan

Appendix B – Biosecurity Risk Assessment and Management Plan (BRAMP)

11. Contaminated Materials, Waste and Resource Management

Please refer to;

Appendix F Site Waste Management Plan (SWMP)

12. Incident Response and Reporting (including Emergency response)

Please refer to;

Appendix C – Marine Pollution Contingency Protocol (MPMP)

13. Monitoring, KPIs and Environmental Risk Register

13.1 Monitoring and KPIs

Subject / KPI	Frequency / target	Owner	Action threshold
Drainage and runoff	Daily and before forecast heavy rainfall	Supervisor	Unknown route, failed protection or dirty runoff: stop and rectify.
Fuel and chemical controls	Daily	Supervisor	Leak, damaged container or inadequate containment: isolate and correct.
Marine water quality	Continuous during relevant activity	Marine Manager	Abnormal plume, sheen, debris or alkaline release: stop and investigate.
Ecology controls	As required by final ecology plan	ECoW / MMO	Constraint breach or protected-species observation: stop and seek advice.
Dust and trackout	Daily during relevant works	Supervisor	Visible dust leaving site or material on public route: suppress and clean.
Pollution incidents entering or threatening water/drains	Target: 0	Construction Manager	Immediate incident response and management review.
Environmental inductions completed before access	Target: 100%	Environmental Lead	Deny access until complete.
Weekly inspections completed	Target: 100%	Environmental Lead	Escalate missed inspection.
Actions closed by target date	Target: ≥95%	Construction Manager	Escalate overdue actions and trend recurring failures.
Waste documentation retained	Target: 100%	Waste Coordinator	Stop off-site movement until records are verified.

13.2 Environmental Risk Register

Risk ratings: H = high, M = medium, L = low. The Environmental Lead shall review ratings after final design, confirmed consent conditions, surveys and RAMS.

ID	Activity / risk	Initial	Key controls	Residual	Owner
ER-01	Fuel or hydraulic oil reaches port drains.	H	10 m separation, bunding, drip trays, inspections, spill kits, controlled refueling and response.	L	Construction Manager
ER-02	Silty water or dredging plume affects water quality.	H	Authorised method and footprint, weather/tide limits, monitoring, stop triggers and no untreated discharge.	L *(this has been omitted from the McLH scope of works)*	Marine Manager
ER-03	Concrete, grout or washwater enters harbour.	H	Contained mixing/washout, shuttering, pour release, capture debris and no discharge.	L	Supervisor
ER-04	Marine mammal or ecological disturbance.	H	Confirmed constraints, approved MMO/ECoW controls, soft-start where required, biosecurity and lighting controls.	M	Marine Manager
ER-05	Demolition debris enters water or creates navigation hazard.	H	Containment, exclusion zone, lifting plan, recovery arrangements and waste segregation.	L	Demolition Lead [TBC]
ER-06	Contaminated material encountered.	M	Stop, segregate, assess, classify and use lawful disposal or reuse route.	L	Environmental Lead
ER-07	Severe weather, flood or tide disrupts controls.	H	Forecast checks, secured stores, contingency arrangements, stop criteria and post-event inspection.	M	Construction Manager
ER-08	Tow or installation conflicts with navigation.	H	Approved tow plan, navigation controls, Harbour Master coordination and weather limits.	M	Marine Manager

13.3 KPIs and Corrective Action

KPI	Target	Measure
Pollution incidents entering or threatening water/drains	0	Incident register
Environmental inductions completed before access	100%	Induction register
Weekly inspections completed	100%	Inspection schedule
Corrective actions closed by target date	≥95%	Action tracker
Waste transfer / consignment documentation retained	100%	Waste register
Unapproved discharges	0	Permit and incident records
Environmental toolbox talks delivered	Minimum 1 per week	Training register

A non-conformance requires immediate containment where necessary, a named owner, target date, verification of closure and trend review. The Construction Manager shall stop work where a non-conformance creates an uncontrolled pollution or ecological risk.

14. Document Control Process

The CEMP appendices include an issue number and the date of update along with the reason for update on the front of the section. McLaughlin & Harvey Project Manager will have overall responsibility for the document, ensuring the most current version of the document is provided in electronic form to Stena Line and the appointed NEC Project Manager.

McLaughlin & Harvey will update the CEMP during the construction phase to take account of additional detail as it becomes available as well as learning from experience. Specifically, reviews and if required updates will be made as required following lessons learned during the construction works.

14.1 Documentation on Site

A copy of this plan is to be on site in hard copy and is also made available in electronic format. This is a dynamic living document and will be amended as necessary. The master copy is retained on McLaughlin & Harvey IDMS Viewpoint. A copy of the company procedures appropriate to the site, together with the management systems available on Apollo. These are controlled documents.

On completion of the Proposed Development, the final versions of the CEMP and all other documents that record environmental risks, best practice examples, mitigation measures, commitments, environmental incidents, lessons learned and other relevant information will be provided for inclusion in the project file.

15. Auditing

15.1 Introduction

Day to day audits and checks will be carried out by the McLH Project Manager to ensure that all tasks are being carried out in line with procedures, the CEMP, Risk Assessed Method Statements (RAMS), and environmental best practice as identified within the Schedule of Mitigation. The audits will also verify if the mitigation is effective in minimising environmental impacts and risks. In addition, McLH Environmental Advisor will carry out audits to ensure that works are compliant with the relevant licences and consents. A SHEQ Audit Flow Diagram is presented overleaf.

15.2 Audits

Environmental audits will be carried out at least monthly; they shall be timed such that site visits are completed within 2 weeks of the start of a significant new phase of work. The purpose of environmental audits is to ensure legal compliance and that best practice is being implemented in terms of Environmental Management. McLH environmental advisors audit topics are likely to include:

- **Consent compliance –** where specific conditions are followed through to ensure that they are being adhered to.
- **CEMP implementation –** a section of the CEMP may be chosen and compliance with it checked including implementation of underpinning RAMS
- **Site checks –** walk overs to identify if the construction site is as would be expected from an environmental perspective with the aim of identifying areas for improvement, and to highlight good practices

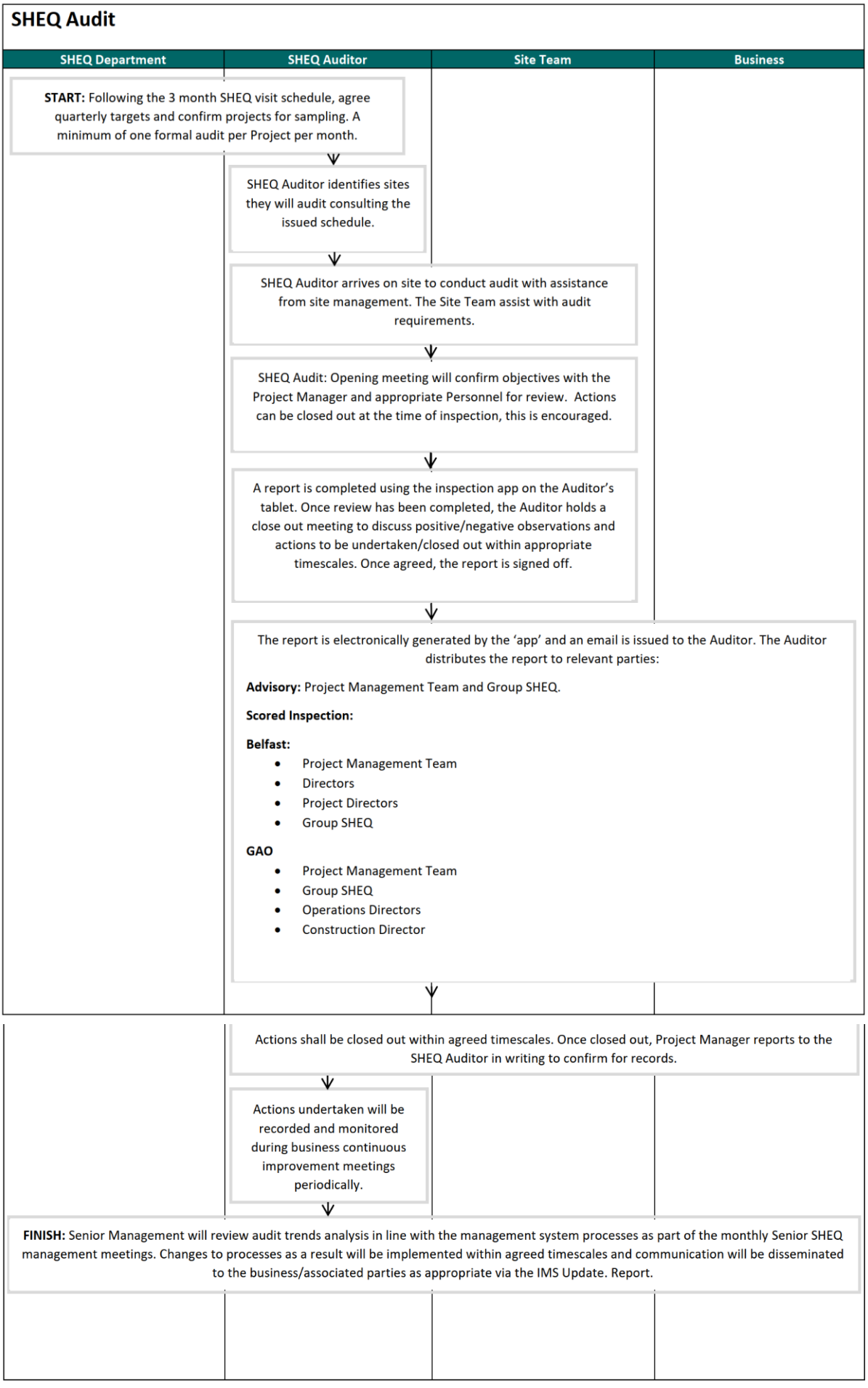
15.3 Implementation

Audit forms including checklists will be utilised for each audit type to ensure that all items are appropriately checked and that audits are recorded in a systematic manner.

Where audits identify areas of improvement, appropriate steps will be taken to implement these as shown within the flow diagram overleaf. Improvements requiring immediate action will be immediately raised with the Project Manager, to allow for actions to be arranged. If immediate action is not required, then the audit report will be submitted within 24 hours of the audit, to the Project Manager, and actions agreed at the next site management meeting.

In addition to identifying areas for improvement, areas of good practice will be highlighted and fed back to allow appropriate recognition to be given.

SHEQ Audit Flow Diagram



15.4 Indicative Audit Programme

Environmental Aspect	Minimum Check / Audit Focus	Indicative Frequency	Responsible Role
Pollution prevention and spill readiness	Fuel storage, spill kits, drain protection, plant leaks and emergency access	Daily checks / monthly audit	Site Manager / Environmental Advisor
Waste management	Segregation, storage, transfer documentation and housekeeping	Daily checks / monthly audit	Site Manager / Environmental Advisor
Water and sediment management	Runoff controls, dewatering, concrete controls and marine interface	Daily during relevant works / monthly audit	Site Manager / Environmental Advisor
Ecology and biosecurity	Implementation of approved controls, inspections and reporting	Risk-based / TBC by final consent	ECoW / Environmental Advisor
Navigation and vessel coordination	Notices, exclusion arrangements, communications and vessel controls	Risk-based / TBC by final consent	Site Manager / Vessel Master / ECoW as required
New work phase	CEMP, RAMS and consent-condition review	Risk-based / TBC by final consent	Site Manager / Environmental Advisor

16. General Environmental Requirements

16.1 Marine Pollution Contingency Plan

- Please see Appendix C for the Marine Pollution Contingency Plan (this includes emergency spills, accidents, emergency response, natural disasters and Fuel and Chemical Storage)

16.2 Biosecurity Risk Assessment and Management Plan

- Please see Appendix B – Biosecurity Risk Assessment and Management Plan (BRAMP) for more information

16.3 Vessel Management Plan

- Please see Appendix A for the Vessel Management Plan

16.4 Navigation Safety Plan

- Please see Appendix D for the Navigation Safety Plan

16.5 Protocol for Archaeological Discoveries

- Please see Appendix E for the Protocol of Archaeological Discovery (PAD)

16.6 Waste Management

- Please see Appendix F for the Site Waste Management Plan

16.7 Marine Mammal Management Plan

- Please see Appendix G for the Marine Mammal Mitigation Protocol

17. Marine and Water Interface Controls

Marine works shall proceed only under approved marine RAMS, marine licence conditions, Harbour Master directions, weather and tide criteria, and task release controls. The Marine Manager shall maintain a daily marine works log.

Activity	Primary risks	Mandatory controls
Temporary and permanent piling	Noise, hydraulic leaks, sediment disturbance, marine mammal disturbance.	Inspect plant; use biodegradable fluids where specified; deploy approved MMO / soft-start controls where required; maintain exclusion zone and record start/stop times.
Drilling and grouting to bedrock	Grout loss, alkaline release, drill spoil and hydraulic spill.	Use sealed transfer lines, monitored volumes, contained mixing, grout contingency and immediate stop on loss of containment.
Plough dredging	Sediment plume, unauthorised footprint, contaminated sediment or navigation conflict.	Work only within authorised area and method; verify plant position; manage weather/tide; stop for abnormal plume, debris, unknown material or consent trigger.
Scour protection placement	Rock loss, turbidity, vessel movement and underwater noise.	Use approved clean rock specification; controlled placement; prevent free fall outside method limits; record quantity and location.
Demolition over water	Falling debris, debris escape, dust, noise and pollution.	Use debris containment, exclusion zones, lifting plans, covered waste containers and immediate recovery of dropped material where safe.
Concrete repairs	Alkaline debris, repair mortar loss and washwater.	Shutter repairs, capture debris, contain washout and prevent material entering water.
Pontoon / bridge tow and installation	Collision, navigation conflict, fuel spill and dropped objects.	Approved tow plan, navigation safety plan, communications protocol, tug suitability checks, weather limits and Harbour Master coordination.

17.1 Underwater Noise and Marine Mammals

- McLaughlin & Harvey shall implement the current approved Marine Mammal Mitigation Plan [refer to Appendix G] and any marine licence conditions.
- For impact piling, appoint a Marine Mammal Observer where required by the approved method. Complete the required pre-piling watch and record observations, weather, sea state and decision to start.
- Apply the approved soft-start procedure before impact piling. Stop work where the approved mitigation zone is breached or observer conditions are inadequate.
- Do not assume that an outline mitigation measure is approved. Confirm all final requirements against the relevant permissions, surveys and marine licence conditions.
- Record piling method, duration, location, soft-start, MMO observations, stoppages and restart decisions.

18. Outline Construction Methodology

18.1 Introduction

Within this CEMP each stage of the construction is discussed in turn with respect to each relevant aspect. Where appropriate, references to other sections are provided to avoid the duplication of information.

The table below provides a summary of the aspects associated with each of the construction tasks. Aspects that require specific mitigation and/or monitoring to minimise impacts are shown in red. Those shown in yellow require general mitigation or monitoring, which has been identified within the other sections of the CEMP.

The input required by McLH Environmental Advisor is detailed for each task, proportionate to the risk involved at that stage of the project. It should be noted however, that all staff have environmental and health and safety responsibilities and will undergo site induction training and task specific environmental training.

Risk Assessed Method Statements (RAMS) will be in place for specific activities to ensure that appropriate environmental protection measures are in place throughout.

Aspect	Excavation Works	Piling Operations	Concrete Works	Demolition Works	Dredging Works	Scour Protection
Air Quality						
Airbourne Noise & Vibration						
Marine Mammals						
Navigation						
Vessel / Traffic Access						
Water Quality						

Key

Specific and General Requirements Apply
General Requirements
Not applicable

18.2 General Requirements

Some aspects occur through multiple phases of the project and topic specific mitigation has been identified within other sections of this document. These are general requirements and as such apply to all applicable tasks and hence are not detailed under specific tasks mentioned below to avoid duplication.

18.2.1 Materials and Waste

Materials will be managed as detailed in Appendix F – Site Waste Management Plan. Throughout all stages of the works good housekeeping should be employed to minimise dust and littering. Measures will be in place to ensure items are not windblown. When equipment and material is no longer required it should be removed from the construction site.

18.2.2 Navigation

Ongoing communication with the Harbour Master will be carried out to ensure that works are carried out in accordance with the Harbour Authority' navigational safety requirements. A Fisheries Liaison Officer will be appointed to liaise with the local fishing industry. Navigation will be managed in accordance with Appendix A – Vessel Management Plan and Appendix D – Navigation Safety Plan.

18.2.3 Water Quality - Pollution Prevention

The majority of activities will require materials and wastes to be stored that could give rise to pollution, hence Appendix F: Site Waste Management Plan should be complied with throughout the construction works. If an incident does occur the Appendix C – Marine Pollution Contingency Plan should be followed.

18.3 Project Specific Tasks

The works include the staged replacement of the existing Fishguard linkspan with a floating pontoon and linkspan bridge. The works will be undertaken in three stages including;

Programme stage	Current programme basis
Pre-shutdown works	Enabling Works (bankseat access platforms / M&E diversions) / temporary works, / concrete repairs, dredging and guide-pile works while ferry services remain live.
Ferry shutdown	Jack Up Barge removal, bankseat works, existing linkspan removal / new linkspan installation, Scour Protection, resurfacing works, testing and initial commissioning.
Post-shutdown works	Cathodic Protection Installation, MEICA.

The sequence remains subject to approved RAMS, licence conditions, Harbour Master directions, weather and tide criteria, and Stena Line operational requirements. Before each phase, the Site Manager and Marine Manager will confirm, plant readiness, marine notices and exclusion arrangements, interface controls, emergency arrangements and environmental constraints. Work will stop where pollution, navigation, weather/tide or ecology controls are ineffective.

All works will comply with the CEMP and attached appendices including Vessel Management Plan, Navigation Safety Plan, Marine Pollution Contingency Protocol and Biosecurity Risk Assessment and Management Plan.

18.3.1 Pre Shutdown Works

This phase comprises site establishment, enabling works, procurement and mobilisation, concrete repairs and guide-pile construction while ferry operations remain live.

Site Establishment - McLH will establish approved compound, welfare, secure storage, segregated waste facilities, access routes, delivery booking, traffic management and drainage protection. The project team will verify existing services and structural constraints before intrusive works and coordinate daily with Stena Line and the Harbour Master to control passenger, vehicle, marine and small-craft interfaces.

Dredging - Dredging and scour-preparation works will proceed within the approved footprint and method. Works include dredging of loose silts and sands or capital dredging using suitable marine plant. Plant position, weather/tide conditions and water quality will be monitored.

Linkspan Guide Pile - Guide-pile works will use a temporary steel working platform and piling gate. Temporary tubular piles will be installed using vibratory / impact techniques from the quay using a crawler crane, followed by erection of the platform/gate and placement of a temporary liner. The permanent tubular guide pile will be rotary drilled using a combination of digging buckets, augers and percussive tools to design depth, installed and concreted or grouted in accordance with the approved piling methodology. The temporary liner and works will be removed only after acceptance of the permanent works. Where required by the Marine Mammal Mitigation Plan and marine licence, a qualified Marine Mammal Observer, soft-start procedure and records will be implemented.

Concrete Deck Repairs - Concrete repairs to the existing suspended deck will use contained access or scaffolding, debris capture and traffic management.

Environmental Considerations
Appendix A – Vessel Management Plan (VMP)
Appendix B - Biosecurity Risk Assessment and Management Plan (BRAMP)
Appendix C – Marine Pollution Contingency Plan (MPCP)
Appendix D - Navigation Safety Plan (NSP)
Appendix E – Protocol of Archaeological Discovery (PAD)
Appendix F - Site Waste Management Plan (SWMP)
Appendix G – Marine Mammal Mitigation Protocol (MMMP)

18.3.2 Ferry Shutdown Works

The programmed ferry shutdown period runs for 6 weeks. Works will include the removal of the existing linkspan and equipment, bankseat works, scheduled dredging/scour protection, and installation, connection, testing and initial commissioning of the new floating linkspan system. Before shutdown, the project team will implement a detailed shutdown execution plan, lifting plans, tow plan, marine exclusion arrangements and daily joint coordination meetings.

Jack Up Barge Removal – The existing Jack Up Barge will be isolated, disconnected and secured before being towed to quay edge within the Port of Fishguard for removal. Hydraulic, mechanical and electrical equipment and lifting towers will be removed using a combination of demolition equipment. The link bridge will be lifted by crane barge or spud-leg barge and transferred for approved reuse, recovery or disposal. Debris containment, controlled lifts, exclusion zones and immediate recovery arrangements will prevent material entering the harbour or creating a navigation hazard.

Bankseat - Following removal, the existing bankseat will be inspected. If retained McLaughlin & Harvey will remove bearings, complete required concrete repairs or plinth works and install new bearings. If replacement is required following assessment and approved design, the bankseat will be cut into manageable sections by controlled coring and/or wire sawing, lifted from floating plant and redundant pile heads cut to the required level. A prefabricated replacement bankseat will be lifted onto pre-installed piles; pile-head collars will be grouted and the bearing shelf prepared. Concrete/grout mixing, transfer and washout will remain fully contained, with immediate stop and contingency action for any loss of containment.

Scour Protection - Scour protection will use only the approved clean-rock specification and controlled placement method working from marine and land-based plant.

Installation of Floating Pontoon - The new pontoon and bridge will arrive by approved marine transport. Under Harbour Master coordination, tugs, workboats and crane barges will position and secure the pontoon alongside the restraint/guide piles. The bridge, access bridge, transition flaps, machinery house and associated mechanical, electrical and hydraulic systems will be installed in a controlled sequence. Activities include ballasting, bankseat-hinge installation and grouting, power and sensor connections, hydraulic oil filling/flushing, pressure testing, controls testing and integrated operational tests.

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18.3.3 Post Works Shutdown

After ferry services recommence, remaining works will operate under live-port interface controls. The programme includes Cathodic Protection installation, MEICA completion, final adjustments, inspections, testing, snagging and completion works. Works will be planned around ferry movements and operational restrictions, using daily briefings, segregated work areas, approved access arrangements and Harbour Master coordination where marine access is required.

The system will undergo final acceptance testing. Defects and outstanding items will be closed under approved RAMS. The project team will compile environmental monitoring data, waste transfer records, piling and dredging logs, marine records, test certificates and incident/inspection records. Works will conclude through handover inspection, post-condition survey, removal of temporary works and compound facilities, demobilisation, final clean, completion certification, and provision of as-built, health-and-safety-file and operation-and-maintenance information.

The CEMP will be reviewed after each phase and updated to address approved changes, incidents, lessons learned and residual environmental risks.

19. Planning & Marine Licence Environmental Considerations

This section details the key environmental considerations and mitigation requirements for the Fishguard Linkspan Replacement project. Its primary purpose is to outline how compliance with the Marine Construction Licence (MD-Lot) and Planning Conditions (Pembrokeshire County Council) will be achieved and the table below cross references each discharge condition to the relevant management plan as included within the appendices to this CEMP.

Ref.	Discharge Condition Summary	Planning Permission	Marine Construction Licence	Appendix
1	Marine Pollution Contingency Protocol		✓	A
2	Biosecurity Risk Assessment and Management plan (BRAMP)		✓	B
3	Vessel Management Plan (VMP)		✓	C
4	Navigation Safety Plan (NSP)		✓	D
5	Protocol of Archaeological Discovery (PAD)		✓	E
6	Site Waste Management Plan (SWMP)	In line with good practice		F
7	Marine Mammal Mitigation Protocol		✓	G

Standalone Documents

Ref.	Discharge Condition Summary	Planning Permission	Marine Construction Licence	Appendix
8	Pollution Written Scheme of Investigation (WSI)		✓	N/A

20. Relevant Legislative Requirements

All construction work will be carried out in compliance with the relevant requirements of UK environmental law, which includes but is not limited to the following:

- The Harbours Act 1964
- Marine and Coastal Access Act 2009
- Environmental Protection Act 1999
- The Marine Works (Environmental Impact Assessment) Regulations 2007
- Environment (Wales) Act 2016 including the Section 6 biodiversity and resilience of ecosystems duty
- The Marine Works (Environmental Impact Assessment) Regulations 2007
- Groundwater Regulations 1998
- Water Resources Act 1991
- Water Environment (Water Framework Directive (England and Wales) Regulations 2017
- Environmental Permitting (England and Wales) Regulations 2016
- Flood and Water Management Act 2010
- Flood Risk Regulations 2009
- Conservation of Habitats and Species Regulations 2017
- Wildlife and Countryside Act 1981 (as amended)
- Ancient Monuments and Archaeological Areas Act (AMAAA) 1979
- Environment (Wales) Act 2016, Section 6 biodiversity and resilience of ecosystems duty
- Conservation of Habitats and Species Regulations 2017
- Port Marine Safety Code 2016
- Merchant Shipping Act 1995
- Harbours, Docks and Piers Clauses Act 1847
- The UK Marine Policy Statement 2011
- The Welsh National Marine Plan

McLH will be responsible for complying with all legislative requirements as well as any other requirements specified by the relevant regulatory authorities including Natural Resources Wales and Pembrokeshire County Council.

21. CEMP Appendices

Appendix A – Vessel Management Plan (VMP)

Appendix B – Biosecurity Risk Assessment and Management Plan (BRAMP)

Appendix C – Marine Pollution Contingency Protocol (MPMP)

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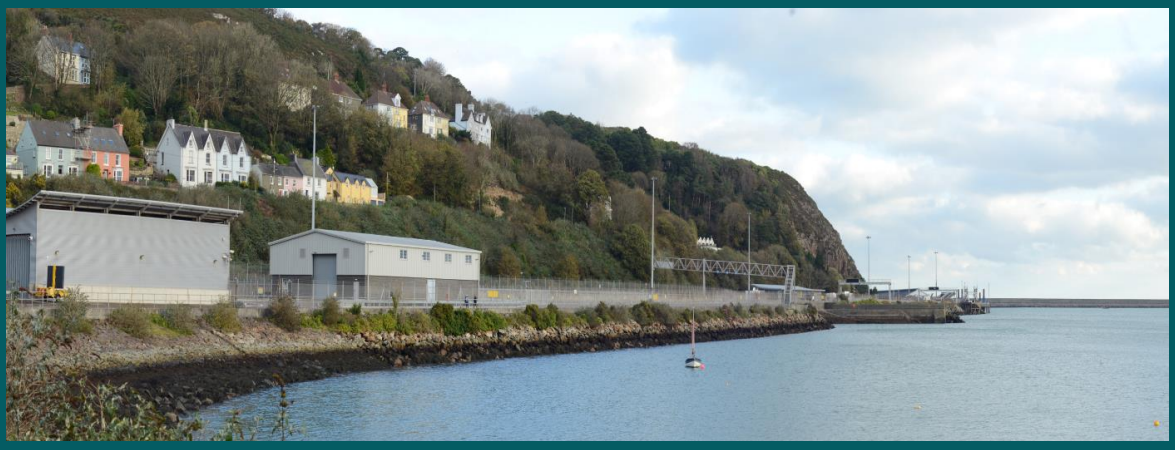
Fishguard Linkspan Replacement

Appendix A – Vessel Management Plan (VMP)



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Document Status				
Issue	**Date**	**Authored by**	**Approved by**	**Comments**
01	31.08.26	Will Brown	J McCarey	Draft for external consultee feedback

Document Overview

This Vessel Management Plan governs the safe planning, coordination, movement and control of construction vessels and marine interfaces during the Fishguard Linkspan Replacement works at the Port of Fishguard, Pembrokeshire.

Contents

1. Introduction

Stena Line will replace the ageing temporary linkspan at the Port of Fishguard with a floating linkspan pontoon. This Plan establishes the mandatory marine-control framework for Stena Line, Fishguard Port, port stakeholders, the Principal Contractor, marine subcontractors and regulators. It applies to every construction vessel, tug, barge, jack-up unit, floating pontoon, workboat, delivery craft and survey vessel engaged in or affected by the works.

The Plan controls marine activity across the existing linkspan area, adjacent waters and the approved project marine works area. It does not replace the statutory responsibilities of vessel masters, port requirements, marine licence conditions, approved method statements, risk assessments, the Collision Regulations or emergency procedures. Where requirements conflict, the most stringent applicable control applies.

This is a live document. The Construction Marine Coordinator (CMC) shall review it at least monthly and immediately after a relevant incident, material programme change, change of vessel or plant, alteration to a marine work method, revised port requirement, or change to an exclusion zone or access arrangement. No revised arrangement shall be implemented until it has been approved through the project change-control process and communicated to affected parties.

1.1 Project Description and Works Sequence

The project involves the replacement of an ageing linkspan structure with a new floating linkspan pontoon at Port of Fishguard, to serve Stena Line's ferry operations. The Port of Fishguard is a live working marine and coastal environment located in Pembrokeshire, Wales. The scope of works is comprised of the following packages of work:

- **Removal and demolition –** removal of the existing linkspan bridge, equipment, kiosk, lattice supports and jack-up barge, and partial demolition of buffer dolphins.
- **Marine bed works –** Dredging of loose silts and sands within the authorised footprint, redistributing material only as authorised, and installation of approved clean-rock scour protection.
- **Guide piles –** install two tubular steel guide piles drilled and grouted to bedrock and install temporary piling and steel frames.
- **Bankseat and deck –** construct replacement bankseat on six tubular piles, break out asphalt, form concrete surfacing and repair the existing piled deck.
- **Pontoon and bridge –** tow, install, connect, test and commission the pontoon and linkspan bridge.
- **Support activities –** Mobilisation, compound setup, welfare, storage, deliveries, waste, logistics, lighting, security and demobilisation.

The above planned works will effectively be undertaken in three separate stages, outlined as follows:

- **Pre-shutdown –** enabling works (bankseat access platforms / M&E diversions) / temporary works / concrete repairs, dredging and guide-pile works while ferry services remain live.
- **Shutdown –** Jack-Up Barge removal, bankseat works, existing linkspan removal / new linkspan installation, scour protection, resurfacing works, testing and initial commissioning.
- **Post-shutdown works –** Cathodic protection installation and Mechanical, Electrical, Instrumentation, Control and Automation (MEICA).

1.2 Contacts and Roles

Named contacts, deputies and 24-hour contact numbers shall be confirmed before marine mobilisation. The current contact sheet shall be displayed at the site office, marine coordination point, welfare facilities and on relevant project vessels.

Role	Organisation	Core Responsibility	Name / Contact
Stena Line Project Representative	Stena Line	Client decision-making; ferry-operation interface; escalation point.	TBC
Port Representative	Port of Fishguard	Port requirements, navigational controls and stakeholder coordination.	TBC
Principal Contractor Project Manager	Principal Contractor	Overall delivery, resources and implementation of this Plan.	TBC
Construction Marine Coordinator (CMC)	Principal Contractor	Daily marine coordination, movement control, compliance records and incident coordination.	TBC
Marine Contractor / Barge Master	Marine subcontractor	Controls assigned marine plant and coordinates local vessel interface at active work areas.	TBC
Vessel Master	Marine subcontractor	Safe navigation, vessel readiness, crew competence and compliance with lawful instructions.	TBC
SHEQ / Environmental lead	Principal Contractor	Pollution prevention, inspections, environmental response and reporting support.	TBC
Emergency services liaison	Principal Contractor	Maintains emergency contact sheet and supports emergency access planning.	TBC

1.3 Project Marine Controlled Zone

The project marine controlled zone covers the water areas affected by the proposed works. The controlled zone shall be subdivided into a working grid and phase-specific exclusion zones.

The final controlled-zone limits, grid references, work locations, temporary pile positions, access corridors, holding areas and exclusion-zone extents shall appear on the current approved Working Grid and Marine Works Layout. Construction vessels shall operate only within approved locations and routes unless the CMC authorises a recorded change.

1.4 Cross Referencing

The following to be referenced during the delivery of the marine works;

- Construction Environmental Management Plan (CEMP) and pollution-prevention arrangements.
- Construction Phase Plan (CPP), project SHEQ plan and Emergency Response Plan (ERP).
- Approved marine work method statements, risk assessments, lift plans and tow plans.
- Marine licence, planning approvals, port requirements and consent registers.
- Approved drawings, Working Grid and marine logistics plans.
- Vessel-specific operating manuals, certification, stability information and weather limitations.
- Notices to Mariners, stakeholder notices and daily marine coordination records.

1.5 Emergency Contact Details

All persons shall protect life first, raise the alarm, notify the relevant emergency service and report immediately to the CMC. Masters retain responsibility for their vessel and crew. The CMC shall coordinate the project response, preserve access for emergency craft and notify Stena Line, the port authority and regulators as required.

Emergency contact	Number / Channel	Action
Emergency services	999	Request police, fire, ambulance or coastguard response as required.
VHF distress and safety	Channel 16	Use for distress, urgency and safety communications.
NRW incident hotline	0300 065 3000	Report spills or pollution incidents.
Port authority	TBC	Notify navigational incident, obstruction, collision, grounding or port emergency.
Construction Marine Coordinator	TBC	Coordinate project response and stop work where required.
Barge Master / Marine Contractor	TBC	Secure plant, account for personnel and control local marine interface.
Stena Line operational contact	TBC	Notify ferry-operation interface and client escalation.

2. Communications, Approvals and Consultations

The CMC shall drive a structured communication process that keeps ferry operations, port stakeholders, marine subcontractors, small-craft users and regulators informed of work that affects navigation, access or emergency response. Daily coordination controls the immediate workface; weekly forward planning identifies upcoming constraints; formal notices communicate material changes.

- Hold a daily marine coordination briefing before each marine shift or vessel movement period.
- Issue a rolling look-ahead covering planned work areas, vessels, tows, lifts, weather constraints and ferry interfaces.
- Consult Stena Line and the port authority before any activity that affects ferry approaches, berth access, navigable water or emergency access.
- Brief marine crews on current exclusion zones, work windows, VHF arrangements, emergency procedures and change notices.
- Record decisions, constraints, actions and close-out responsibilities in the Daily Marine Coordination Record.
- Escalate unresolved navigation conflicts to the Project Manager, Stena Line and port authority before work proceeds.

No marine operation shall commence without an approved method statement and risk assessment proportionate to its hazards. The CMC shall verify that all permits, consents, notifications and required briefings are complete before releasing a vessel or work activity.

3. Marine Coordination, Communications and Vessel Control

3.1 Construction Marine Coordinator

The Principal Contractor shall appoint a competent CMC with authority to stop or defer project marine activity that presents an uncontrolled risk. The CMC coordinates construction activity with Stena Line, the port authority, vessel master's and marine subcontractors. Key responsibilities includes;

- Maintain the daily movement register, working-grid status and phase-specific work-area plan.
- Confirm vessel readiness, approvals, crew briefings, weather limits and operational interfaces before movement.
- Coordinate ferry-operation constraints during the pre-shutdown phase.
- Confirm safe access arrangements for port users affected by the works.
- Maintain records of licences, notifications, inspections, incidents and corrective actions.

- Suspend operations when conditions exceed agreed controls or communication is ineffective.

3.2 Marine Contractor / Barge Master

The marine contractor/Barge Master shall control marine plant allocated to its work area and maintain direct communication with the CMC. The Barge Master shall coordinate barge positioning, plant movements, safe passing arrangements, workboat deployment and local access requests. This role does not remove the legal authority or responsibility of vessel masters.

The Barge Master shall not permit passage through an active marine work area until plant is in a safe condition, the route is clear, affected crews are briefed and the agreed control is confirmed by radio.

3.3 Communications Channels and Listening Watch

All project vessels shall maintain a continuous listening watch on the agreed project working channel during marine working periods and on Channel 16 for distress and safety traffic. VHF communications shall be concise, use vessel identifiers and include location, intended movement, direction of travel and confirmation of any agreed passing arrangement.

- Use Channel 16 for distress, urgency and safety communications only.
- Use the approved working channel for project coordination and access requests.
- Report loss of VHF, AIS or other critical navigation equipment immediately to the CMC and port authority as required.
- Use a dedicated safety boat or alternative agreed control when radio coordination alone does not provide safe separation.

3.4 Consents, Licences and Notifications

The CMC shall maintain an on-site and vessel-accessible consent register. The register shall identify each condition, owner, evidence requirement, notification lead time and compliance status. No licensed activity shall proceed until the CMC verifies that the relevant consent conditions, vessel notifications and records are satisfied.

3.5 Notices to Mariners and Stakeholder Notices

The CMC shall prepare and issue Notices to Mariners and stakeholder notices for activities that alter navigational safety, available water, access routes, work periods, lighting, marking, exclusion zones, tows or marine plant positions. Notices shall state the nature of works, location, dates, restrictions, contact route and approved communication channel.

4. Vessel Movements

Vessel movements shall be planned, authorised, logged and controlled. Masters shall navigate safely at all times and comply with port requirements, COLREGs (in accordance with International Regulations for Preventing Collisions at Sea), approved project controls and lawful instructions. The CMC shall not schedule conflicting activities within the same constrained marine area.

4.1 Daily Vessel Activity Planning and Movement Register

Before work starts, the CMC shall review the next 24 hours of marine activity with the Barge Master, vessel masters and relevant stakeholders. The review shall identify vessel locations, arrival and departure windows, work areas, weather and tide limits, lifts, tows, ferry movements, port-user interface, exclusions and emergency access.

Daily Marine Coordination Record	Required Entry
Date / shift	
CMC / Barge Master	
Weather, tide and sea-state forecast	
Ferry operations and port constraints	
Planned vessels, plant and work areas	
Exclusion zones / access corridors	
Towage, lifting or delivery activity	
Communications check and agreed channel	
Small-craft interface / safety-boat requirement	
Actions, restrictions and sign-off	

4.2 Pre-shutdown Works with Ferry Operations Live

Initial piling and temporary works are anticipated while ferry services remain operational. Ferry movements take priority over construction vessel movements and construction work shall be planned around confirmed ferry-operational requirements. The CMC shall agree daily working windows with Stena Line and the port authority before marine plant is positioned or moved.

- Do not obstruct ferry routes, berthing approaches, turning areas or operational safety zones.
- Secure or relocate construction plant before each agreed ferry movement window.
- Stop piling, lifting, towage and intrusive operations when required by the approved ferry-interface arrangement.
- Deploy additional lookout, safety boat or other approved control where construction plant creates a constrained passage.

- Record each ferry-interface control in the movement register and daily coordination record.

4.3 Shutdown-phase Movements

During the anticipated two-month ferry shutdown, the CMC shall coordinate demolition/removal, plough dredging, scour-protection placement, pontoon works and bridge installation as a controlled sequence. The absence of ferry services does not remove the need to manage port operations, regular small craft, fishing activity, emergency access or other authorised port activity.

- Separate simultaneous operations through defined work zones, timed movement windows and formal handovers.
- Maintain an open, controlled access corridor where required by the port authority and where safe to do so.
- Sequence high-risk towage, heavy lifts and rock-placement activity to prevent conflicting vessel movements.
- Issue updated stakeholder notices before each material phase change.
- Confirm 24/7 coordination arrangements when shutdown works operate continuously.

4.4 Arrival, Departure, Towage and Delivery Protocols

Every vessel arrival, departure, tow, pontoon delivery and material delivery shall be booked through the CMC before movement. The responsible master shall provide vessel particulars, crew details, intended route, draft, dimensions, tow configuration, weather limitations and any special constraints required for safe planning.

- Confirm approval, movement window, route, work-area availability and communication channel with the CMC.
- Complete a pre-movement briefing covering weather, tide, tow plan, emergency actions, exclusion zones and interface controls.
- Establish the required exclusion zone and safety-boat or escort arrangement before movement begins.
- Maintain positive communication between tug, tow, Barge Master, CMC and port authority as required.
- Record actual movement times, deviations, incidents and completion status in the register.

4.5 Small-craft, Fishing and Port-user Interface

Other port activity and regular small craft may continue during the works. The CMC shall manage this interface through notices, direct VHF communication, visible marking, controlled access corridors, holding points and movement windows. Construction crews shall treat all non-project users as potentially unfamiliar with the work sequence and actively prevent conflict.

- Do not assume small craft have received project notices or can hear project VHF traffic.
- Provide a clear, agreed safe-passage arrangement where access remains available.
- Suspend work or hold plant where a passing movement cannot be completed safely.
- Use a safety boat when visibility, plant configuration or activity creates an elevated access risk.
- Escalate repeated non-compliance or unsafe approaches to the port authority.

5. Marine Safety Measures

5.1 Exclusion Zones, Working Grid and Access Corridors

The CMC shall establish a working grid that identifies active work areas and provides a common location reference for all marine communications. Phase-specific exclusion zones shall protect piling, drilling, lifting, dredging, scour protection, towage, demolition and pontoon operations. Access corridors and holding points shall be shown on current approved drawings.

No vessel shall enter an exclusion zone without the permission of the CMC or Barge Master and confirmation that the work activity is in a safe state. Exclusion zones shall be reviewed at every shift change and after repositioning marine plant.

5.2 Navigation Lighting, Marking and Safety Boats

All construction vessels and marine plant shall display navigation lights, shapes, marks and signals required for their operation. Temporary marks, buoys, lights and signage shall be installed only to the approved arrangement and maintained throughout the relevant phase. The CMC shall inspect marking at the start of each shift and after adverse weather or plant relocation.

- Maintain effective day and night identification of active plant, obstructions and exclusion-zone limits.
- Provide safety boats with competent crews, reliable communications and defined intervention duties when required.
- Stop affected operations if required navigation marking or lighting fails and safe separation cannot be maintained.
- Record defects, temporary controls and repair completion in the daily coordination record.

5.3 Speed, Wash and Passing Controls

Vessels shall proceed at a safe speed that prevents wash, suction, loss of control, damage to moored craft, disturbance of marine plant or risk to personnel. Passing arrangements shall be positively agreed before a vessel enters a constrained area. Masters shall reduce speed further where visibility, weather, towage, personnel transfer or work activity demands it.

5.4 Adverse Weather, Tide and Sea-state Controls

The CMC shall review weather, tide and sea-state forecasts before every marine shift and before critical moves. Each vessel master shall provide vessel-specific operational limits before mobilisation and remains responsible for determining whether conditions are safe for the vessel. The CMC shall coordinate project-wide suspension, recovery and restart decisions.

- Define operation-specific limits in approved method statements, lift plans and tow plans.
- Suspend work when forecast or observed conditions exceed an agreed limit or compromise communication, visibility, station-keeping or personnel safety.
- Secure barges, pontoons, temporary works and loose materials.
- Do not restart until the CMC verifies conditions, inspections, vessel readiness and revised controls.

5.5 Lifting, Piling, Dredging, Scour Protection and Towage Controls

High-risk marine operations require approved, activity-specific method statements and risk assessments. The Principal Contractor shall establish exclusion zones, communications, competent supervision, plant inspection, emergency stop arrangements and hold points before work starts. This includes;

- **Piling and drilling**: control vessel position, temporary works, drilling/grouting activity and marine-mammal mitigation requirements through approved procedures.
- **Lifting:** use approved lift plans, competent lifting teams, weather limits, exclusion zones and clear suspended-load controls.
- **Dredging:** operate within the approved footprint and material-redistribution arrangement; monitor activity and prevent unauthorised encroachment.
- **Scour protection:** control rock delivery, placement pattern, vessel positioning and exclusion zones; prevent conflict with access corridors.
- **Towage and pontoon operations:** follow an approved tow plan, maintain tug-to-tow communications and protect all tow routes and turning areas.

5.6 Pollution Prevention and Incident Response

The Principal Contractor shall prevent releases of fuel, oil, grout, concrete, sediment, waste and other pollutants. Spill kits and suitable containment equipment shall be available on marine plant, at refuelling locations and at active workfaces. Daily supervisor inspections and weekly environmental inspections shall verify that controls remain effective.

- Stop the source if safe to do so; raise the alarm and protect people from immediate danger.
- Contain the release using suitable equipment; do not flush, hose down or disperse the pollutant.

- Notify the CMC and environmental lead immediately.
- Notify NRW through the incident hotline.
- Notify the port authority, Stena Line and other parties required by the emergency plan or consent conditions.
- Record the incident, preserve evidence, investigate root cause and implement corrective actions before restart.

6. Overview of Proposed Vessels and Marine Plant

The final vessel schedule shall be approved before mobilisation. No vessel or floating plant shall work under this Plan until the CMC has verified its suitability, certification, crew competence, communication equipment, operating limits and consent/notification status. To make efficient use of marine plant the programme allows for coinciding plant usage.

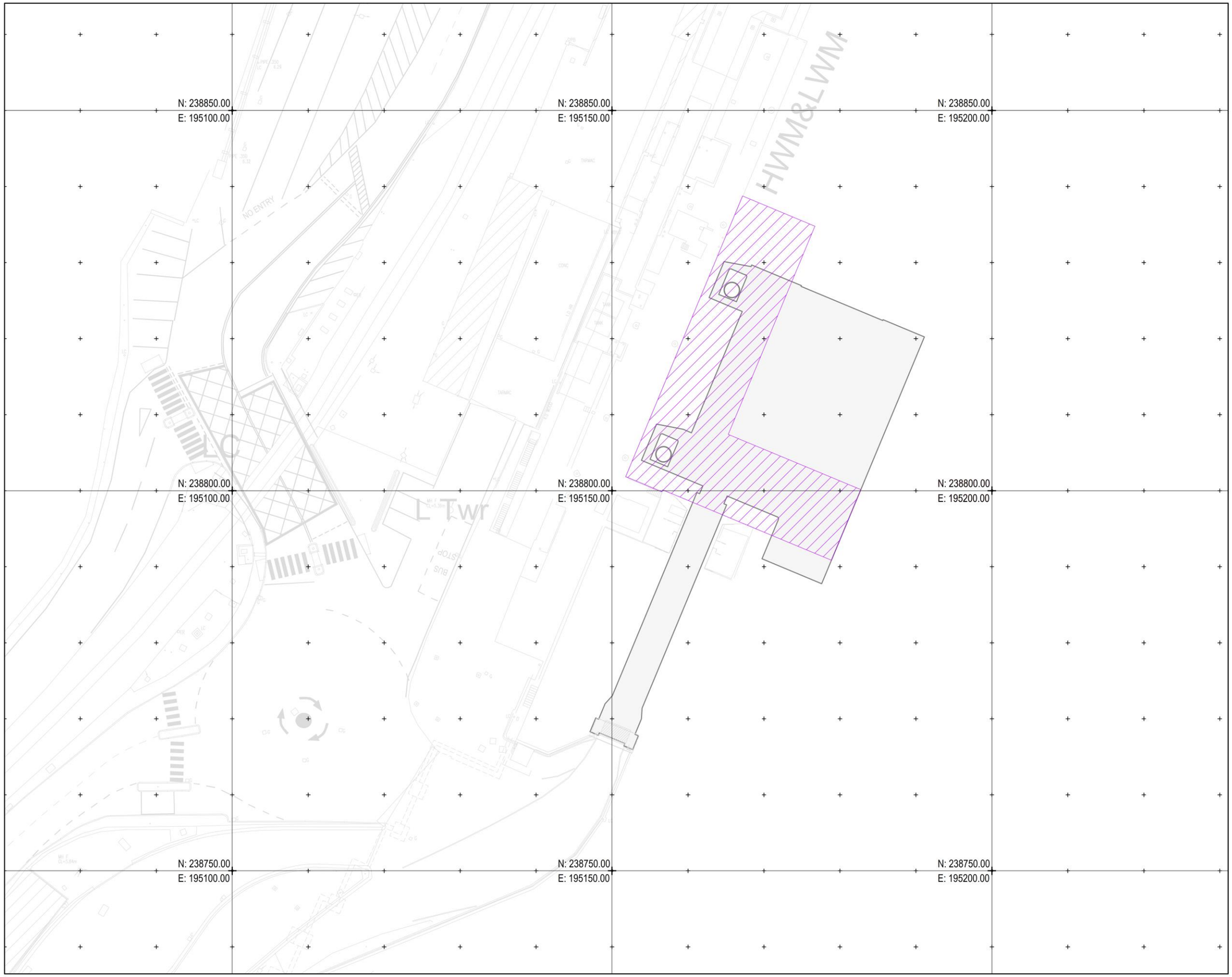
Vessel / plant category	Anticipated function	Required information before mobilisation	Status
Tug	Tow pontoon, bridge pontoon and support marine movements.	Name, IMO number, dimensions, bollard pull, certification, Master, operating limits.	TBC
Floating pontoon	New linkspan pontoon and bridge-delivery pontoon.	Dimensions, draft, tow plan, mooring/connection arrangement, stability information.	TBC
Jack-up barge / removal plant	Existing jack-up barge removal and related operations.	Name, dimensions, spud arrangement, towing configuration and removal method.	TBC
Piling / drilling platform	Guide-pile, temporary-pile and bankseat-pile installation.	Name, dimensions, positioning method, plant configuration and weather limits.	TBC
Barge / work pontoon	Temporary works, materials, lifting and support operations.	Name, dimensions, deck loading, mooring/spud arrangement and certification.	TBC
Dredging plant	Dredging beneath pontoon footprint.	Name, method, dimensions, operating limits and approved work area.	TBC
Rock-delivery vessel / barge	Delivery and placement of clean rock armour scour protection.	Name, IMO number, cargo capacity, dimensions and discharge method.	TBC
Workboat / multicat / crew transfer vessel	Personnel transfer, positioning, line handling, survey and support.	Name, IMO number where applicable, dimensions, passenger limits and communications.	TBC
Survey vessel	Pre-, during- and post-work survey support.	Name, dimensions, operating area and communications.	TBC
Safety boat	Exclusion-zone support, lookout and emergency assistance.	Name, capability, crew competence, response equipment and assigned duty.	TBC

7. Summary of Port, Statutory and Marine-licence Conditions

The CMC shall maintain a live compliance register and verify each requirement before the associated activity begins. This summary identifies the control areas that require final confirmation; it does not state final approval conditions.

Control area	Mandatory Project Control	Evidence / Verification
Port authority requirements	Comply with confirmed port control, navigation, movement, reporting, lighting and emergency-access requirements.	TBC
Marine licence	Undertake licensed activities only within approved scope, boundary, methods and conditions.	TBC
Approved drawings	Use current approved layouts for works, dredging, exclusion zones, access and plant positions.	TBC
Vessel notifications	Provide required vessel, Master, ownership and IMO details within applicable lead times.	Vessel notification register.
Notices to Mariners	Issue notices through the agreed port authority process before navigation-affecting works.	TBC
Method statements and risk assessments	Approve and brief task-specific controls before work begins.	Signed briefings and controlled documents.
Environmental compliance	Maintain licences/permits on site; complete daily supervisor and weekly environmental inspections.	Inspection records and incident reports.
Pollution response	Report spill/pollution incidents to NRW	Incident log and notification record.

Appendix A - Working Grid and Marine Works Layout



McLaughlin & Harvey Ltd
15 Trench Road, Mallusk
Newtownabbey
Co. Antrim , BT36 4TY

T:- 028 9034 2777
F:- 028 9034 2236
W:- mclh@mclh.co.uk

Notes:

- Drawing must be read in conjunction with tender issued drawings.
- All dimensions should be checked on site.
- Any errors or divergences should be brought to the attention of the construction management team.

Date	Rev.	DB
03/09/26	P01	SMcL

Project No: 5642

Scale: NTS

Client: STENA LINE LIMITED

Unique Identifier (name): 5642-MLH-XX-XX-DR-W-6001

Suitability Status: S2 - SUITABLE FOR INFORMATION

Drawing Name:

WORKING GRID AND MARINE WORKS LAYOUT

Project Name:

FISHGUARD LINKSPAN REPLACEMENT

Appendix B – Vessel Activity Register

Date / shift	Vessel / IMO	Master / contact	Activity	Grid / location	Arrival / departure window	Constraints / controls	CMC authorisation

Appendix C – Phased Marine Logistics Plan

Phase	Primary activity	Ferry status	Marine controls	Required plan / notice
1	Temporary works and initial piling.	Ferry operations live.	Ferry-priority movement windows; controlled plant positioning; defined stop-work triggers.	Approved pre-shutdown layout and stakeholder notice.
2	Shutdown demolition/removal, dredging and scour protection.	Ferry operations suspended.	Controlled work zones, access corridor, small-craft interface and safety-boat controls.	Approved shutdown logistics plan and Notice to Mariners.
3	Pontoon tow-in and securing; bridge delivery and installation.	Ferry operations suspended.	Approved tow plan, exclusion zones, towage communications and emergency access.	Tow plan, installation layout and stakeholder notice.
4	Temporary works removal and handback.	Ferry Operations Live	Controlled removals, verification survey and revised navigation arrangements.	Approved handback plan and notice withdrawal/update.

Fishguard Linkspan Replacement

Appendix B

Biosecurity Risk Assessment and Management Plan

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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.

Contents

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 (Austrominius modestus): 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 (Sargassum muticum), broad-clawed porcelain crab (Porcellana platycheles) and small barnacle (Hesperibalanus fallax).	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	*Fishguard Linkspan Replacement / TBC*
Asset type and ID	*TBC*
Owner / operator	*TBC*
Inspection date, time and location	*TBC*
Previous operating location / water body	*TBC*
Inspector / role	*TBC*
CHECK – hull, niches, lines, fenders, anchors, tools, PPE, retained water and sediment inspected?	*Yes / No – details and photographs reference: TBC*
CLEAN – visible fouling, sediment and debris removed in controlled area?	*Yes / No – method and waste container reference: TBC*
DRY – equipment drained and air dried, or approved equivalent control applied?	*Yes / No – details: TBC*
Suspected INNS or unusual fouling observed?	*Yes / No – Appendix D reference: TBC*
Quarantine required?	*Yes / No – location and controls: TBC*
Biosecurity Manager clearance	*Approved / Rejected / Conditional – name, signature and date: TBC*

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

Fishguard Linkspan Replacement

Appendix C

Marine Pollution Contingency Plan

McLaughlin & Harvey

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

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.

Contents

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.

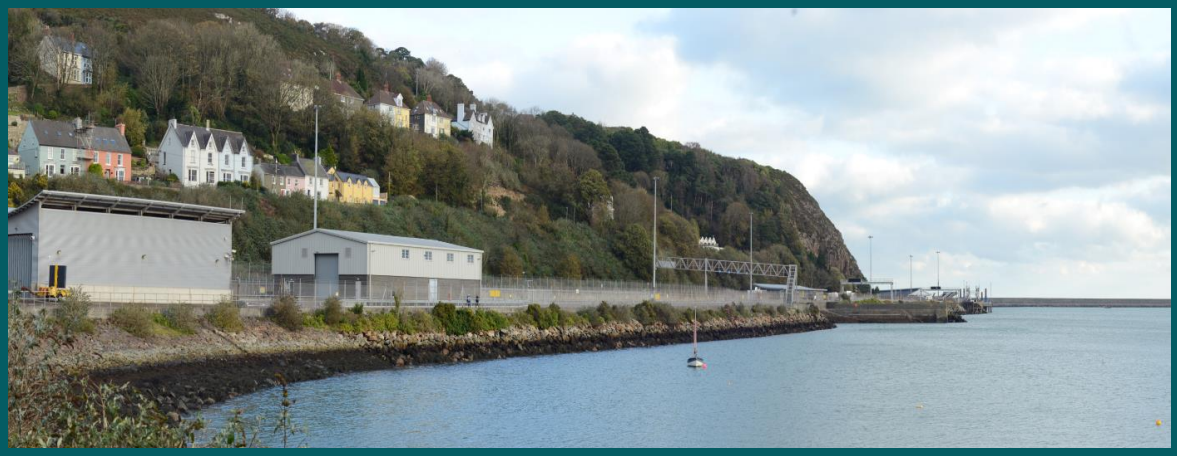
DON'T:

- × 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.

Fishguard Linkspan Replacement

Appendix D – Navigation Safety Plan (NSP)



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Document Status				
Issue	**Date**	**Authored by**	**Approved by**	**Comments**
01	02/09/2026	W Brown	J McCarey	Draft for external consultee feedback

Document Overview

This Navigation Safety Plan (NSP) manages navigation safety for all harbour and waterway users affected by the works. It does not replace the Vessel Management Plan, which controls contractor vessel scheduling, plant allocation and vessel-specific operational arrangements.

Contents

1. Introduction and purpose

This NSP establishes the navigation-safety framework for marine construction interfaces created by the Fishguard Linkspan Replacement works. It protects ferry operations, harbour users, small craft, fishing and recreational users, emergency vessels, construction craft and shore teams through defined planning, communication, exclusion, monitoring and emergency controls.

This NSP manages navigation safety for all harbour and waterway users affected by the works. It does not replace the Vessel Management Plan, which controls contractor vessel scheduling, plant allocation and vessel-specific operational arrangements.

1.1 Scope and navigation-safety objectives

This NSP applies to every marine activity that affects navigable water, harbour access, manoeuvring space, visual navigation, emergency access or interaction between construction and third-party waterway users. Safety objectives includes;

- Maintain safe navigation routes and clear decision authority throughout each work phase.
- Prevent collision, allision, grounding, obstruction and unsafe passing incidents.
- Control temporary restrictions, exclusion zones, transit corridors and holding areas through approved drawings and Notices to Mariners.
- Preserve emergency-vessel access and evacuation routes at all times.
- Confirm final routes, coordinates, VHF channels, speed and traffic rules, lighting, marking, harbour instructions and marine-licence conditions in writing before mobilisation.
- Stop marine work immediately when approved controls are absent, ineffective or exceeded.

1.2 Project and marine-work description

The scheme replaces the existing linkspan arrangement at Fishguard Harbour. Marine works include removal of the existing linkspan bridge, related equipment and jack-up barge; partial demolition at buffer dolphins; plough dredging within the pontoon footprint; scour-protection placement; guide-pile and temporary-works piling; bankseat works; pontoon tow-in and securing; and delivery and installation of the linkspan bridge by floating pontoon and tug.

The port remains operational during relevant phases. Marine works must therefore be sequenced around ferry operations, harbour users, small craft and emergency access. This plan does not establish ferry timetables, closure durations, movement windows or port operating rules.

1.3 Interface with Vessel Management Plan and other project documents

Document	NSP interface
Vessel Management Plan (VMP)	Controls contractor vessel scheduling, plant allocation, vessel activity records, crew arrangements and vessel-specific operations. The NSP controls the wider navigation-safety interface.
Construction Phase Plan / SHEQ Plan	Controls project health, safety and welfare requirements.
Marine work method statements and risk assessments	Define task-specific controls, lifting, piling, dredging, towage and emergency actions.
CEMP	Controls environmental commitments, pollution prevention and reporting.
Marine licence and conditions	Define legal constraints, notifications, marks, lighting and other consent requirements.
Harbour Authority instructions	Control harbour-specific navigation and operational requirements.
Controlled-area plan drawings	Define the approved physical navigation arrangement for each phase.

1.4 Roles, competence and responsibilities

Role	Navigation-safety responsibilities
Client / Principal Contractor	Appoint competent marine leadership; provide resources; approve the NSP; ensure approved arrangements are implemented; enforce stop-work decisions.
Construction Marine Coordinator (CMC)	Own daily navigation coordination; verify approvals; lead marine briefings; maintain the dynamic navigation risk register; issue or coordinate notifications; stop unsafe work.
Harbour Authority / Harbour Master	Provide harbour instructions, operational constraints and approvals within their authority; coordinate port traffic requirements. Contact and authority limits are TBC prior to commencement of the works.
Barge Master / Marine Contractor	Implement approved local controls around marine plant; maintain worksite readiness; coordinate construction interface communications as approved; report changes and hazards to the CMC.
Vessel Masters	Retain command and statutory responsibility for their vessels; comply with COLREGs, harbour directions, approved controls and safe-navigation decisions; refuse unsafe passage or tasking.
Shore team	Maintain quayside exclusion, lifting and debris controls; keep emergency access clear; report navigation hazards immediately; prevent unauthorised public access to work interfaces.

All appointed personnel must demonstrate relevant competence, authority and communication capability before undertaking their role. Names, contacts, deputising arrangements and out-of-hours coverage are TBC, prior to commencement of the works.

1.5 Controlled navigation area and plan drawings

The controlled navigation area covers water affected by construction plant, floating structures, towage, piling, dredging, rock placement, over-side lifting, temporary works and associated access routes. It does not create a navigation restriction until the Harbour Authority and relevant approvals confirm the phase arrangement in writing.

- Appendix A defines the minimum drawing content for each phase.
- Use only the current, revision-controlled controlled-area plan at the marine coordination point and on relevant vessels.
- Show exclusion zones, transit corridors, holding areas, emergency routes, marine plant footprints, aids to navigation and shore hazards.
- Do not use indicative design drawings as operational navigation drawings.
- Coordinates, dimensions and charted references are generally known at time of writing.

2. Navigation Risk Management Framework

2.1 Navigational risk assessment and dynamic daily review

The CMC shall maintain a navigation risk register using Appendix B. The register shall assess phase-specific hazards, affected users, controls, residual risk, responsible person and verification evidence. It shall address ferry interaction, constrained water, floating plant, towing, visibility, weather, tide, sea state, small-craft access, emergency access, obstruction, marking failure, communication failure and simultaneous operations.

Before each marine shift, the CMC shall complete a dynamic review of planned work, current plant position, weather forecast, tide, visibility, operational port traffic, ferry requirements, worksite status, restrictions, emergency access and unresolved actions. The review shall record a clear proceed, proceed-with-controls or stop decision.

2.2 Pre-Start Approvals and Marine Coordination Briefing

No marine phase shall start until the CMC confirms that the approved phase drawing, task risk assessment, method statement, Harbour Authority requirements, notifications, exclusion-zone controls, communications arrangements and emergency access arrangements are current and briefed.

1. Confirm written Harbour Authority and client requirements for the phase.
2. Confirm applicable marine-licence conditions and permits.
3. Verify the controlled-area drawing, routes, coordinates and restrictions.
4. Verify lighting, buoyage, marks, signals and signage before restricting navigation.
5. Brief construction teams, vessel masters and affected shore personnel.

6. Issue required Notices to Mariners or local notices before the restriction takes effect.
7. Record the briefing and approval using Appendix C and Appendix D.

2.3 Change management and stop-work authority

The CMC, Harbour Authority/Harbour Master within their authority, barge master, vessel master and Principal Contractor site management each hold stop-work authority. Any person identifying an unsafe navigation condition shall raise the alarm, stop the affected activity where safe, and report to the CMC immediately.

- Stop work following loss of marking, lighting, communications, approved route integrity or emergency access.
- Stop work when weather, tide, visibility or sea state exceeds approved task limits.
- Stop work when an unplanned vessel movement, emergency response or port operational requirement conflicts with the work area.
- Reassess and obtain written acceptance for changes to routes, coordinates, plant footprint, work windows, traffic controls or exclusion arrangements.
- Restart only after the CMC records corrective actions and confirms controls with affected parties.

3. Stakeholder communications and notifications

3.1 Harbour Authority, ferry operator, marine contractors, local users and emergency services

The CMC shall maintain a stakeholder communication schedule. Communications shall be proportionate to navigation impact and issued early enough for recipients to plan safely. The schedule shall include the Harbour Authority, ferry operator, marine contractors, local berth users, fishing and recreational user representatives where appropriate, emergency services and environmental response contacts.

Stakeholder	Required communication
Harbour Authority / Harbour Master	Phase plan, restrictions, work windows, marks and lighting proposal, incidents, changes and restart request.
Ferry operator	Confirmed operational interfaces, restrictions, protected manoeuvring requirements and shutdown-phase arrangements.
Marine contractors	Daily work areas, exclusions, transit arrangements, weather limits, emergency actions and communication protocol.
Local harbour users	Notice of restrictions, safe routes, access limitations, duration, contact route and emergency arrangements.
Emergency services / HM Coastguard	Emergency access implications, escalation arrangements and incident information when activated.
Natural Resources Wales	Pollution incident reporting through 0300 065 3000, in accordance with project controls.

3.2 Notices to Mariners / local notices

Issue a Notice to Mariners or local notice where works affect navigation, access, available water, harbour approaches, temporary marks, lighting, exclusions, towage or large floating-structure movements.

Notices shall state only confirmed information. They shall identify the work period, affected area, approved restrictions, chart datum where applicable, contact route, expected visual aids and required user action. Appendix E provides an editable template.

3.3 VHF, communication and listening-watch arrangements

VHF channels, call signs, Harbour Authority communication procedures, listening-watch requirements and escalation routes are TBC prior to mobilisation. No project document shall assign a working channel until the Harbour Authority confirms the arrangement. Listening watch arrangements includes;

- Maintain the Harbour Authority-required listening watch during relevant operations.
- Use Channel 16 only in accordance with statutory emergency and distress requirements.
- Confirm plain-language communications, call signs, language, radio checks and fallback telephone arrangements at each daily briefing.
- Record communication failures and suspend affected movements until safe alternatives are established.

3.4 Daily navigation-safety briefing and records

The CMC shall lead a daily briefing before marine work begins and whenever conditions change materially. Attendance shall include relevant vessel masters or nominated representatives, Barge Master, shore supervisors and affected specialist contractors. Use Appendix C and retain records in the project SHEQ file.

4. Navigation Arrangements by Work Phase

4.1 General principles and maintained navigable routes

Navigation arrangements shall maintain safe separation between marine works and third-party users. The CMC shall define maintained navigable routes only after written confirmation of route geometry, depth constraints, traffic rules, passing criteria, speed controls, emergency access and Harbour Authority requirements. This includes;

- Keep construction plant inside the approved controlled area.
- Keep designated transit corridors physically and visually distinguishable from exclusions.
- Do not obstruct access, turning areas, berth approaches or emergency routes without written approval.

- Do not permit passing alongside active lifting, piling, dredging, rock placement or towage unless the approved phase arrangement expressly permits it.
- Apply COLREGs, Harbour Authority directions and vessel master judgement at all times.

4.2 Existing ferry-operation phase

During ferry-operation phases, ferry safety and port operational requirements take priority. Marine works shall proceed only within written, agreed restrictions and work windows, which are currently TBC (prior to commencement). The CMC shall verify each day that planned work does not conflict with ferry movement, approach, departure, manoeuvring, berth access or contingency requirements.

Piling, temporary works, construction plant relocation, towage and other activities with potential to affect ferry operations require a documented interface review before commencement. The VMP shall manage contractor vessel timing; this NSP shall manage the navigation-safety constraints affecting all users.

4.3 Restricted-access and shutdown-phase works

Restricted-access and shutdown-phase works include activities requiring greater occupation of the waterway, including linkspan removal, dredging, scour protection, pontoon securing and bridge installation. The shutdown duration, closure scope and access arrangements are approximately 2 months.

Before this phase starts, the CMC shall verify the approved restrictions, emergency-vessel route, small-craft arrangements, temporary marks, lighting, notices, shore signage and restart criteria. Restrictions shall be removed promptly when the supporting hazard no longer exists.

4.4 Arrival/departure, towage and large floating-structure movements

Towage and movement of pontoons, the linkspan bridge or other large floating structures require a dedicated movement plan and risk assessment. The plan shall identify tow route, weather and tide limits, tug and tow configuration, escort requirements, abort locations, communication protocol, exclusion arrangements, emergency response and Harbour Authority approval route.

Vessel names, tug capability, tow route, tow timing, escort requirement, positions and approval route are presently TBC, prior to mobilisation. No large floating-structure movement shall proceed on the basis of an indicative layout drawing.

4.5 Interaction with small craft, fishing/recreational users and emergency vessels

Small craft, fishing and recreational users remain foreseeable waterway users. The project shall provide clear, timely information and safe arrangements where access is maintained. Emergency vessels receive priority access at all times.

- Do not direct third-party vessels through an active work area.
- Use a controlled transit corridor only when approved, clear, marked and actively managed.
- Hold or escort vessels only under an approved arrangement and without creating an additional hazard.
- Suspend conflicting operations immediately for emergency-vessel access.
- Record user concerns, near misses and access issues in the daily review.

5. Navigation safety control measures

5.1 Temporary exclusion zones, controlled transit corridors and holding areas

Temporary zones shall be established only through the approved phase drawing and checklist in Appendix D. Each zone shall have a defined purpose, boundary, period, controller, communication method, marking arrangement, contingency and removal trigger.

Final coordinates, boundary descriptions, corridor widths, holding areas, traffic direction and speed rules are TBC prior to mobilisation.

5.2 Safe passing and escort/safety-boat arrangements

Safe passing shall be assessed for each phase against vessel type, available water, plant footprint, line handling, wash, visibility, current, tide, simultaneous operations and emergency escape. An escort or safety boat shall be used only where an approved risk assessment defines its role, competence, communications, limits and authority.

5.3 Marine lighting, buoyage, marks, signals and signage

Marine plant, temporary obstructions, transit corridors and restricted areas shall display approved lighting, marks, signals and shore signage required by the Harbour Authority, relevant legislation and marine-licence conditions. Install, inspect and maintain them before the navigation restriction becomes active.

The final marking specification, buoyage, light characteristics, signals, locations and approval route are currently TBC, prior to mobilisation. Any failed or displaced aid shall trigger immediate notification, risk review and, where required, suspension of affected operations.

5.4 Visibility, night working, weather, tide and sea-state limitations

Each marine task shall operate within documented vessel, plant and task limits. The CMC shall use forecast and observed conditions to determine whether controls remain effective. Vessel masters retain responsibility for safe navigation and shall not proceed beyond their vessel limits. This includes;

- Set task-specific minimum visibility, maximum wind, sea-state, tide/current and daylight/night-working limits in approved method statements.
- Do not conduct night work until lighting, marking, communications and emergency response controls receive written confirmation.
- Suspend work when visibility prevents reliable identification of routes, marks, traffic or hazards.
- Record forecast source, observed conditions, decision and responsible person in the daily briefing.
- Reassess after rapid weather change, equipment failure or changed port traffic.

5.5 Piling, dredging, rock placement, lifting and over-side work safeguards

Piling, dredging, rock placement, lifting and over-side work create dynamic hazards from suspended loads, plant movement, reduced manoeuvring space, wake, dropped objects and underwater obstruction. Each task shall have an approved exclusion arrangement and shall stop when third-party navigation enters the protected area or emergency access is required. This includes;

- Position plant within the approved footprint and verify anchors, spuds, legs, moorings and lines are controlled.
- Use dedicated lifting exclusion zones and prevent passage beneath suspended loads.
- Confirm dredging and scour protection placement boundaries, temporary depth hazards and obstruction controls before work.
- Inspect for debris, displaced material and navigation hazards after each shift and following heavy weather.
- Issue updated notifications where work creates a material change to available navigable water.

5.6 Prevention of obstruction, mooring/anchor controls and debris/FOD control

The marine contractor shall prevent obstruction by maintaining approved plant positions, secure moorings, controlled anchors and tidy decks. Mooring lines, anchors, spuds, piles, temporary works and over-side equipment shall not extend outside the approved arrangement unless an authorised change is in place.

Conduct pre-shift and post-shift checks for floating debris, dropped objects, loose materials, unlit hazards and displaced plant. Recover or mark hazards immediately, notify the CMC and Harbour Authority as required, and issue a navigation warning where the hazard affects users.

5.7 Pollution, dropped-object and emergency incident interface

Navigation safety and environmental response are linked. Pollution booms, recovery craft, containment equipment and emergency response actions can restrict navigation. The CMC shall coordinate these controls with the project emergency plan and Harbour Authority requirements.

Report pollution incidents to the NRW Incident Hotline on 0300 065 3000 in accordance with the project environmental controls. Preserve emergency navigation access while containing the incident.

6. Emergency navigation response

6.1 Collision, grounding, loss of propulsion, man overboard and obstruction response

On an emergency, protect life first, raise the alarm, notify the relevant emergency services and Harbour Authority through confirmed arrangements, stop conflicting work and establish a safe exclusion area. Masters retain command of their vessels. The CMC coordinates the construction interface and prevents secondary incidents.

Event	Immediate navigation response
Collision / allision	Stop nearby operations; assess persons, vessel stability, pollution and obstruction; notify Harbour Authority and emergency services as required; preserve safe access.
Grounding / loss of propulsion	Warn traffic; establish a controlled area; deploy approved assistance only; protect against secondary collision and pollution.
Man overboard	Raise alarm; stop hazardous plant and vessel movement; execute approved rescue response; preserve clear approach for rescue craft.
Obstruction / dropped object	Mark or guard the hazard; stop affected navigation; notify CMC and Harbour Authority; survey, recover or formally control before reopening.
Communication or marking failure	Suspend affected movements and restrictions until a safe, confirmed alternative is established.

6.2 Emergency access and evacuation routes

The approved phase drawing shall show emergency marine access, shore evacuation points, rescue-boat launch/access points where relevant, and routes that must remain clear. Emergency access arrangements, emergency-service contacts and evacuation routes are TBC, prior to mobilisation.

Construction plant, stored material, mooring lines and temporary barriers shall not obstruct emergency access. The CMC shall verify this requirement during daily checks.

6.3 Incident reporting, preservation of evidence and recommencement criteria

Report all navigation incidents, near misses, unsafe approaches, unauthorised entries, marking failures and significant user complaints immediately to the CMC. The CMC shall record the event, preserve relevant VHF logs, photographs, CCTV or vessel data where available, and lead a proportionate investigation. This includes;

- Do not restart work until the immediate hazard is controlled.
- Confirm Harbour Authority requirements and statutory reporting obligations.
- Inspect routes, plant, marks, moorings and emergency access after the event.
- Update the risk register, briefing content, drawings or notices where required.
- Record formal recommencement approval by the CMC and relevant authority.

7. Assurance, inspection and review

7.1 Daily checks and marine safety observations

The CMC or nominated competent person shall inspect the controlled area before work and at defined intervals during operations. Checks shall verify plant position, markings, lights, navigation routes, debris control, communications, weather status, emergency access and compliance with the phase plan.

Check	Minimum frequency	Record
Controlled-area readiness	Before each marine shift	Daily briefing record
Lights, marks and signage	Before activation and during relevant hours	Marine safety observation
Plant position, moorings and obstructions	Before shift, after movement and after adverse weather	Marine safety observation
Emergency access route	Before each shift	Daily briefing record
Navigation risk register	Daily and following change/incident	Risk register revision

7.2 Audits, non-conformance and corrective action

The Principal Contractor shall audit NSP implementation at planned intervals and after significant events. Non-conformances shall identify the failed control, immediate containment, owner, due date and verification of close-out. Repeated failures shall trigger management review and revision of the affected arrangement.

7.3 Review triggers and document updates

This NSP is a live document. The CMC shall review it at least monthly during marine works and immediately after a material change or incident. This includes;

- Change in work phase, construction sequence, plant footprint or navigation arrangement.
- New Harbour Authority instruction, marine-licence condition, permit or Notice to Mariners requirement.
- Ferry operational change, restricted-access change or emergency-access change.
- Navigation incident, near miss, user complaint, audit finding or non-conformance.
- Change to weather limits, lighting, marks, communications or approved routes.

8. Summary of approvals, permits and conditions

The CMC shall complete and maintain this register before mobilisation. No activity shall proceed without the approvals and conditions applicable to that activity.

Approval / condition	Responsible owner	Status	Evidence / reference
Harbour Authority navigation arrangements	CMC	TBC	Written confirmation required
Harbour Master contact and authority protocol	CMC	TBC	Written confirmation required
Ferry operator interface arrangements	Client / CMC	TBC	Written confirmation required
Marine licence number and conditions	Principal Contractor	TBC	Copy held in project file
Notices to Mariners / local notice procedure	CMC	TBC	Approved issue route required
VHF channels and listening watch	CMC / Harbour Authority	TBC	Written confirmation required
Temporary marks, lighting and buoyage	CMC	TBC	Approved specification required
Controlled-area routes and coordinates	CMC	TBC	Approved phase drawing required
Speed and traffic rules	Harbour Authority /	TBC	Written confirmation required

	CMC		
Emergency access and response protocol	CMC	TBC	Approved emergency card required
Towage / floating-structure movement approval	CMC	TBC	Approved movement plan required

Appendix A – Navigation safety plan drawing requirements and controlled-area plan

Drawing requirement	Required content
Control information	Project title, phase, drawing number, revision, date, scale, north point, chart datum and approval status.
Physical work area	Construction plant footprint, temporary works, piles, dredge areas, rock-placement areas, lifting zones, moorings, anchors and shore interfaces.
Navigation arrangement	Approved transit corridors, exclusion zones, holding areas, maintained routes, traffic direction and emergency route.
Navigation aids	Temporary lights, buoys, marks, signals, shore signage and inspection responsibility.
Coordinates and dimensions	Approved coordinates, widths, offsets, clearances and reference datum. Mark all unconfirmed information.
Operational notes	Phase start/end conditions, communication protocol, restrictions, emergency actions and drawing-specific hazards.
Approval block	CMC, Harbour Authority/Harbour Master where required, Client/Principal Contractor and date of written confirmation.

Controlled-area plan register:

Phase	Drawing number	Revision	Approval status	Issue date
Existing ferry-operation phase	[TBC]	[TBC]	[TBC]	[TBC]
Restricted-access / shutdown phase	[TBC]	[TBC]	[TBC]	[TBC]
Pontoon tow-in and securing	[TBC]	[TBC]	[TBC]	[TBC]
Linkspan bridge floating delivery and installation	[TBC]	[TBC]	[TBC]	[TBC]

Appendix B – Navigation risk register template

ID	Phase / activity	Hazard and affected users	Initial risk	Controls required	Owner	Residual risk	Verification / status
NSP-001	TBC	TBC	TBC	TBC	TBC	TBC	TBC
NSP-002	TBC	TBC	TBC	TBC	TBC	TBC	TBC
NSP-003	TBC	TBC	TBC	TBC	TBC	TBC	TBC
NSP-004	TBC	TBC	TBC	TBC	TBC	TBC	TBC

Appendix C – Daily marine navigation-safety briefing record

Briefing item	Record
Date / shift	
Work phase / controlled-area drawing revision	
CMC / briefing leader	
Weather, tide, sea-state and visibility reviewed	
Ferry / port operational interface reviewed	
Marine plant footprint and planned activities	
Transit corridors, exclusions and emergency route confirmed	
Lights, marks, signage and communications checked	
VHF and fallback communications [TBC]	
Notices / stakeholder communications current	
Stop-work triggers and emergency actions reviewed	
Proceed decision / restrictions	
Attendees and signatures	

Appendix D – Temporary exclusion-zone / transit-corridor approval checklist

Check	Yes / No / N/A	Evidence / comment
Phase drawing is approved and current		
Zone purpose, boundary and duration are defined		
Coordinates, widths and chart datum are confirmed		
Harbour Authority requirements are confirmed in writing		
Ferry and local-user interfaces are addressed		
Notice to Mariners / local notice issued where required		
Lighting, marks, buoyage and signage are approved and installed		
VHF and communication protocol is confirmed		
Emergency access route remains clear		
Weather, visibility and task limits are defined		
Safety boat / escort arrangement is approved where required		
Daily briefing completed		
CMC authorisation to activate arrangement		
Harbour Authority confirmation where required		

Appendix E – Notice to Mariners template

Field	Editable content
Notice title	Fishguard Linkspan Replacement – Navigation Notice
Notice number / revision	TBC
Issue date and time	TBC
Effective period	TBC
Location	Fishguard Harbour, Goodwick/Fishguard, Pembrokeshire
Works description	TBC
Navigation impact	TBC
Controlled area / coordinates	TBC
Maintained route / restrictions	TBC
Temporary marks and lighting	TBC
Communication arrangements	TBC confirmed Harbour Authority arrangements required
Emergency arrangements	Emergency vessels retain priority access; details TBC
Contact	TBC—confirmed contact required
Issued by / approval	TBC

Appendix F – Emergency communications and escalation card

Display this card at the marine coordination point, in the site office and on relevant project vessels after completing all TBC fields.

Escalation point	Contact / action
Immediate danger to life	Call 999 or 112; make distress or urgency communications as required by statutory procedure.
Harbour Authority / Harbour Master	TBC - confirm number, VHF channel and out-of-hours route
Construction Marine Coordinator	TBC - confirm name and 24-hour contact
Principal Contractor incident lead	TBC - confirm name and 24-hour contact
Barge Master / Marine Contractor	TBC - confirm name and contact
HM Coastguard	TBC - confirm approved contact route
Ferry operator operational contact	TBC - confirm contact route
NRW pollution incident hotline	0300 065 3000
Emergency response sequence	Protect life; raise alarm; stop conflicting work; warn traffic; notify authorities; establish exclusion; preserve evidence; restart only after authorisation.

Fishguard Linkspan Replacement

Appendix E

Protocol for Archaeological Discoveries

McLaughlin & Harvey

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

Document Overview

This Protocol for Archaeological Discoveries (PAD) sets the mandatory response to a suspected archaeological discovery during the Fishguard Linkspan Replacement works.

Contents

1. Introduction

This Archaeological Plan has been developed to fulfil specific marine licensing requirements for the Fishguard Linkspan Replacement. It addresses key considerations outlined in Conditions 3.19 of Marine Construction License CML2612 prior to commencement of the works.

This PAD prevents avoidable damage to archaeological material encountered during construction and provides a controlled, auditable response to chance finds. It establishes who stops work, protects the discovery, records the evidence, obtains specialist advice and authorises resumption.

The project is located at the Stena Line ferry terminal in Goodwick / Fishguard, Pembrokeshire, Wales. The project area covers the existing linkspan, associated hinterland and bay foreshore within the Port site.

This protocol applies across terrestrial, intertidal and marine work fronts. It applies to every work method, including enabling works, demolition, excavation, piling, concrete works, lifting operations, vessel operations and temporary works.

Note;

- All Stena Line personnel, the Principal Contractor (McLaughlin & Harvey), subcontractors, suppliers, visitors and crews must comply with this PAD.
- The PAD does not replace emergency arrangements. Suspected ordnance, human remains, contamination, pollution and other emergencies require the relevant project emergency procedure while the area remains protected.
- The PAD remains live throughout construction and must be updated when appointments, approvals, work methods or discovery requirements change.

2. Site and Archaeological Principles

Port of Fishguard is a historic port setting created in the 1910's through land reclamation at the base of the headland. The works interface with reclaimed land, port infrastructure, the foreshore and Port bed. Ground disturbance, bed disturbance and demolition can encounter unexpected buried, submerged or structural archaeological material.

The Tetra Tech WSI identifies potential for previously unlocated marine archaeological material, including possible wreck material. No wreck is certainly located within the Marine Licence Boundary Area. This PAD provides a precautionary response to unexpected discoveries.

This PAD does not assign an archaeological potential rating and does not state an EIAR conclusion.

The PAD Management Plan Principles includes;

- Preservation in situ as the default approach where practicable and safe.
- Treat every suspected archaeological find as protected until the appointed archaeological advisor assesses it.
- Stop only work that can disturb, damage or compromise the suspected find. Maintain safe access, emergency arrangements, navigation and vessel control.

- Do not handle, move, clean, probe, recover or remove a suspected find unless the appointed archaeological advisor gives written instruction or immediate safety requires action.
- The Site Manager shall not authorise restart until specialist instruction, required notifications, approvals and revised controls are confirmed in writing.
- Suspected ordnance, human remains, contamination, pollution, fire, medical events and other emergencies require the relevant project emergency procedure while the affected area remains protected.

3. Roles and Responsibilities

The Principal Contractor (McLaughlin & Harvey) controls the works area and enforces the stop-work and cordon requirements. The appointed archaeological advisor determines, or advises on, the significance of a discovery, recording requirements and next steps. No person may restart affected work without the required written authorisation.

Role	Mandatory responsibilities
Client – Stena Line Ports Ltd	Maintain oversight of PAD implementation; ensure project governance supports the agreed environmental management arrangements
Principal Contractor – McLaughlin & Harvey	Hold ultimate responsibility for implementation across all contractors; allocate competent resources; control the works area; enforce stop-work and cordons; ensure appointments and contact details are confirmed before issue; review PAD effectiveness through CEMP governance.
Site Manager	Direct the immediate site response; make plant safe; establish and maintain the cordon; prevent access and further disturbance; notify the Environmental Manager/Officer and appointed archaeological advisor; issue written authorisation before work resumes.
Environmental Manager / Officer	Implement the PAD through the CEMP; maintain records; brief site management; review RAMS and workfront controls; coordinate notifications and regulator liaison where required; monitor implementation; record actions, corrective actions and lessons learned.
Site Champion	Act as immediate archaeological reporting focal point for the relevant work front or vessel; ensure the PAD is available and understood; relay discoveries immediately through Site Manager and Environmental Manager routes. Site Champions shall not assess significance or authorise restart.

Nominated Contact	Administer formal notification on behalf of the project; notify Stena Line, the appointed archaeological advisor and NRW
Site Supervisors	Brief crews before intrusive work; confirm workfront controls; stop activities that threaten a discovery; make the area safe; establish initial protection; report immediately; maintain shift records and prevent unauthorised access.
Appointed Archaeological Advisor	Assess, or advise on, the discovery's significance; specify proportionate recording, inspection, sampling, recovery, avoidance, watching brief or investigation requirements; advise on notifications and consents; provide clear written instruction for mitigation and next steps.
Workforce and subcontractors	Attend induction and task briefings; remain alert to potential discoveries; stop only activities that could disturb or damage a find; do not handle, move, clean or remove material; report immediately; comply with cordons and instructions.
Visitors and delivery personnel	Follow site access controls, supervision requirements and instructions. Visitors must not enter a cordoned discovery area.

3.1 Construction-Stage Contact Details

The Environmental Manager/Officer will complete, verify, display and control this directory before intrusive work begins.

Function	Name / organisation	Telephone	Out-of-hours contact	Email
Client representative	Stena Line Contact; TBC	To be confirmed	To be confirmed	To be confirmed
Principal Civil Engineering Director	McLaughlin & Harvey Contact; TBC	To be confirmed	To be confirmed	To be confirmed
Site Manager	McLaughlin & Harvey Contact; TBC	To be confirmed	To be confirmed	To be confirmed
Environmental Manager / Officer	McLaughlin & Harvey Contact; TBC	To be confirmed	To be confirmed	To be confirmed

Appointed archaeological advisor	To be confirmed	To be confirmed	To be confirmed	To be confirmed
Port / marine operations contact	To be confirmed	To be confirmed	To be confirmed	To be confirmed
Police – emergency	999	999	999	N/A
Project UXO / emergency contact	To be confirmed	To be confirmed	To be confirmed	To be confirmed
Relevant regulator / authority, where required	To be confirmed from approvals and advisor advice	To be confirmed	To be confirmed	To be confirmed

4. Prevention and Preparedness

Prevention starts before work begins. Each workfront must be planned to reduce uncontrolled disturbance and ensure crews can respond immediately without creating further risk.

Control	Construction-stage requirement
Induction	Include this PAD in every site and vessel induction. Explain reporting routes, prohibited actions, indicative finds, legal find categories, Archaeological Exclusion Zones (AEZs)/ Temporary Exclusion Zones (TEZs) controls and emergency escalation.
Toolbox talks	Deliver archaeology awareness toolbox talks before intrusive activities begin and repeat them when crews, work methods or workfronts change.
Intrusive-work briefing	Brief crews before demolition, breakout, excavation, piling, seabed works and structural opening-up.
RAMS and task briefings	Embed PAD controls in RAMS, permits, control sheets and daily task briefings. Identify the nominated supervisor and reporting route for each workfront.

Workfront constraint review	Review known constraints, approvals, access limits, marine-operational controls and discovery-response arrangements before each workfront starts.
Defined boundaries	Mark access routes, working limits, exclusion areas and storage areas. Maintain secure hoarding, barriers and access controls.
Response equipment	Keep barriers, cones, tape, signage, discovery forms, cameras and safe location-recording tools available and known to crews.
Marine operations	Coordinate marine workfront controls with Port and navigation arrangements. A discovery response must not compromise safe navigation, vessel safety or other marine-operational controls.

4.1 Indicative Archaeological Finds

Indicative finds include artefacts, pottery, masonry, timber, metalwork, Port or industrial structures, wreckage, deposits, bone and worked stone. A find can be a single object, a group of objects, an exposed surface, a structural feature, an anomaly in a trench or bore, or material recovered during marine works.

Treat a suspected find as protected until the appointed archaeological advisor has assessed it. Do not decide locally that material is insignificant because it appears modern, damaged or common.

4.2 AEZ and TEZ Procedure

Archaeological Exclusion Zones (AEZs) and Temporary Exclusion Zones (TEZs) protect known, suspected or newly discovered archaeological material. An AEZ normally defines a confirmed or accurately located archaeological constraint. A TEZ provides precautionary protection where location, extent or significance remains uncertain.

- Establish an immediate temporary cordon around every suspected discovery.
- Stop all activity that can affect the seabed, ground, structure or archaeological context near the discovery.
- Obtain archaeological advice on whether a formal AEZ or TEZ is required.
- Agree the position, extent, restrictions and controls of each AEZ or TEZ with relevant archaeological curators and authorities where required.
- Record every zone in the AEZ/TEZ register, including coordinate datum, coordinates, extent, restrictions, approval reference, owner, review date and communication record.
- Mark current zones on Design Plans and incorporate them into RAMS, permits, dredging plans, lift plans, vessel instructions and toolbox talks.
- Prohibit dredging, piling, excavation, placement, anchoring, vessel positioning or other affecting activities inside a zone unless expressly authorised in writing.

5. Discovery Identification and Immediate Response

5.1 Mandatory Five-Step Response

Step	Required action
1. STOP	Stop only the activities that could disturb or damage the suspected find. Stop adjacent plant movements, excavation, breaking, drilling, lifting or placement where they threaten the discovery. Make plant safe and maintain safe access and marine-operational controls.
2. PROTECT	Do not handle, move, clean, probe, recover or remove items. Establish a suitable cordon. Keep plant, materials, spoil and personnel outside the protected area. Preserve the find and its context. Protect it from weather, tide, wash, vibration, vehicle movement, theft and unauthorised access where safe to do so.
3. REPORT	Report immediately to the Site Supervisor, then the Site Manager and Environmental Manager/Officer. The Site Manager or Environmental Manager/Officer must notify the appointed archaeological advisor. Notify relevant authorities where required by approvals, marine licence or planning consent.
4. RECORD	Undertake preliminary recording only where safe: date and time; discoverer; exact location or grid reference; workfront and activity; nature and context; photographs and sketch; plant position; protection measures; and notifications made. Do not disturb the find to obtain a record.
5. AWAIT INSTRUCTION	Maintain the cordon and suspension of affected activities until the appointed archaeological advisor gives instruction and the Site Manager provides written clearance or authorisation to resume.

5.2 Decision and Notification Sequence

Identify:
A person observes material, a feature or an anomaly that may be archaeological.

Stop affected activity:
The supervisor stops only work capable of causing further disturbance or damage and makes plant safe.

Secure:
The supervisor establishes a proportionate cordon, protects the context and controls access.

Escalate:
The supervisor informs the Site Manager and Environmental Manager/Officer immediately. Management contacts the appointed archaeological advisor.

Differentiate emergencies:
If human remains, suspected ordnance, contamination, pollution or another emergency is suspected, activate the relevant dedicated emergency procedure immediately while retaining area protection.

Record:
Record the location, circumstances, photographs where safe, and actions taken. Maintain the record in the environmental file.

Assess:
The archaeological advisor inspects or advises on the find, determines the required response and identifies notifications or approvals required.

Authorise:
The Site Manager issues written clearance or authorisation only after receiving the archaeological advisor's instruction and any required consent or regulator approval.

Brief and resume:
Update RAMS, permits, risk register and workforce briefing before controlled resumption.

5.3 Special Circumstances

Circumstance	Mandatory response
Underwater or marine discovery	Maintain safe navigation, vessel control, Port requirements and marine-operational controls while safeguarding the location. Record the location using safe available means. Do not compromise maritime safety to inspect or recover material. Escalate through the Site Manager, Environmental Manager/Officer and appointed archaeological advisor.
Suspected human remains	Stop work, secure the area and do not disturb the remains or associated material. Contact the police and follow police directions. Do not contact archaeology before the police decision except through management as appropriate.
Suspected ordnance	Do not approach, touch, move, disturb or attempt to identify the item. Stop work, establish the required exclusion area and follow the project UXO and emergency plan.
Suspected military aircraft material	Treat material as protected. Do not investigate, recover or move it unless required approvals and specialist instruction are

	confirmed. Notify the archaeological advisor and Ministry of Defence immediately.
Contamination, pollution or other emergency	Protect the area where safe, then activate the relevant project emergency response procedure. Follow pollution, hazardous-material, fire, medical or other applicable controls. This PAD does not replace those procedures.
Discovery during night shift or reduced staffing	Apply the same five-step response. The Site Manager must ensure out-of-hours contacts, site security, cordon checks and shift handover arrangements remain effective until instruction is received.

6. Assessment, Mitigation and Resumption

The appointed archaeological advisor must assess, or advise on, the discovery and recommend proportionate controls. The assessment must consider the find, its context, the active work method, safety constraints, marine-operational constraints and the requirements of relevant approvals. Potential Mitigation Measures include;

- Inspection by the appointed archaeological advisor or other agreed competent specialist.
- Archaeological watching brief during defined intrusive activities.
- Measured, photographic, written or digital recording.
- Targeted sampling, where instructed and safe.
- Controlled recovery, retention or transfer of material.
- Exclusion, avoidance, redesign or amendment to working limits.
- Further investigation before work proceeds.
- Changes to demolition, excavation, dredging, piling, lifting, placement or other work methods.

The archaeological advisor determines, or advises on, significance, recording and the appropriate next steps. McLaughlin & Harvey must implement the resulting instruction in the controlled work area.

6.1 Find Handling, Preservation and Custody

Preservation in situ is the default. Personnel shall not recover material unless the appointed archaeological advisor directs recovery or immediate safety requires it. Any recovery remains subject to legal controls, consent requirements and specialist instruction.

Material / circumstance	Mandatory handling and preservation instruction
All authorised recovered material	Photograph the find and context with scale were safe. Allocate a unique discovery reference. Record location, condition, finder and custody. Keep material secure and separate.
Wet organic material, wood, bone, textiles and leather	Keep damp or submerged as instructed, cool and out of direct light. Provide support to prevent collapse. Do not allow material to dry.
Metal and concreted metal	Do not clean, remove concretions or mix metals. Keep cool and wet as directed. Use gloves where contamination or hazardous corrosion products are possible.

Ceramic, glass and fragile objects	Do not clean. Prevent movement and breakage. Store separately in protective containers as directed.
Large timber, wreckage or structural material	Do not lift or move without specialist instruction. Protect the location, record dimensions and establish an AEZ or TEZ where required.
Human remains, suspected UXO or military aircraft material	Do not recover or handle. Apply the relevant emergency or statutory procedure and await competent authority instruction.

6.2 Conditions for Resumption

Work must not resume in the affected area until the Site Manager issues written clearance or authorisation. The Site Manager must act only after receiving the appointed archaeological advisor's instruction and after obtaining any consent or regulator approval required by the planning consent, marine licence, method statement, consultation response or discovery event.

Before resumption	Required close-out action
Specialist instruction	File the archaeological advisor's written instruction, assessment or record of advice.
Area controls	Confirm the cordon, exclusion area, protection measures and access arrangements are amended or removed only as authorised.
Work method	Update RAMS, permits, lift plans, dredging plans, task briefings or other controls affected by the instruction.
Environmental controls	Update the environmental risk register, environmental file and corrective-action records.
Workforce briefing	Brief all affected crews, supervisors, subcontractors and shifts on the finding, controls and restart limits.
Approval check	Confirm any consent-specific notification, agreement or regulator approval has been completed where required.
Written authorisation	Record the Site Manager's written clearance or authorisation, including scope, workfront, restrictions and date/time.

McLaughlin & Harvey will close corrective actions promptly and verify that revised controls are communicated to all affected shifts and subcontractors.

7. Records, Auditing and Review

The Environmental Manager/Officer must retain an auditable discovery record. Records must demonstrate what was found, who acted, how the location was protected, what advice was received, which notifications occurred and why work resumed.

7.1 Records to Retain

- Completed discovery record and associated site diary entries.
- Dated photographs, sketches, location plans, coordinates and relevant drawing references.
- Cordon and protection records.
- Emails, instructions, approvals, consultation correspondence and regulator communications.
- Archaeological advisor assessments, reports, recording outputs and recommendations.
- Updated RAMS, permits, risk-register entries, toolbox-talk records and written resumption authorisation.

7.2 Inspection, Audit and CEMP Integration

Activity	Minimum requirement
Daily inspections	Site Supervisors inspect active workfront controls on each shift, including access boundaries, availability of response materials and adequacy of protection for any open discovery.
Weekly inspections	The Environmental Manager/Officer checks PAD implementation through routine environmental inspections and records corrective actions.
Progress and HSEQ meetings	Discuss discoveries, controls, actions, lessons learned and outstanding approvals at weekly Site Progress Meetings and regular HSEQ meetings.
CEMP review	Integrate PAD performance into the CEMP review process. The CEMP is reviewed at least monthly and after an incident or change requiring method updates.
Discovery review	Review this PAD after every discovery. Capture lessons learned and update controls before equivalent work continues.
Change review	Review and reissue this PAD where work methods, workfronts, construction-stage appointments, planning permissions, marine licenses, consultation responses or consent requirements change.

McLaughlin & Harvey will close corrective actions promptly and verify that revised controls are communicated to all affected shifts and subcontractors.

Appendix A – Discovery Record Template

Complete this form for every suspected archaeological discovery. Use additional sheets, plans and photographs where required. Do not disturb a find to complete the form.

Field	Required entry
Project	Fishguard Linkspan Replacement
Discovery reference	
Date and time discovered	
Date and time reported	
Discoverer name, employer and role	
Supervisor receiving report	
Workfront / task / RAMS reference	
Exact location	*Grid reference, coordinates, drawing reference, chainage, berth or workfront description, as safe and available*
Tidal / marine conditions, if relevant	
Description of suspected find	*Material, dimensions, visible features, quantity and condition; do not clean or disturb*
Context	*Ground, deck, structure, dredged material, seabed, spoil, water depth or other context*
Activity stopped	
Plant made safe / position	
Cordon and protection measures	
Photographs / sketches	*File names, photographer, direction of view and any sketch reference*
Immediate notifications	*Names, roles, date/time and contact method*
Emergency procedure activated?	*Human remains / UXO / contamination / pollution / other / none*
Archaeological advisor instruction	*Reference, date/time and required action*
Authority / regulator notification required?	*Requirement, recipient, date/time and response*
Mitigation completed	
RAMS / permit / risk-register updates	*Reference and revision*
Workforce re-briefing	*Date, shift and attendance record reference*
Site Manager written resumption authorisation	*Name, signature, date/time, scope and restrictions*
Environmental Manager/Officer file reference	

Appendix B – Archaeology Toolbox-Talk Sign-off Checklist

Briefing check	Confirm / record
Project and workfront identified	
Date, time and shift recorded	
PAD purpose explained	
Indicative finds explained: artefacts, pottery, masonry, timber, metalwork, Port/industrial structures, wreckage, deposits, bone and worked stone	
Five-step response explained: STOP – PROTECT – REPORT – RECORD – AWAIT INSTRUCTION	
Instruction confirmed: do not handle, move, clean, probe, recover or remove a suspected find	
Supervisor, Site Manager, Environmental Manager/Officer and archaeological advisor contact route confirmed	
Cordon materials, discovery forms, camera and location tools confirmed available	
Workfront boundaries, access routes and marine-operational controls confirmed	
Human-remains procedure explained: secure, do not disturb, contact police and follow police directions	
UXO procedure explained: do not approach; follow UXO and emergency plan	
Contamination, pollution and other emergency procedures distinguished from PAD	
Out-of-hours protection and shift-handover arrangements explained	
Requirement for written Site Manager authorisation before resumption explained	
Questions raised and actions recorded	

Attendee name	Employer / role	Signature	Date

Supervisor declaration: I have delivered this toolbox talk, confirmed the reporting route and response equipment, and recorded all questions and actions**. Name:** _____
Signature: _____ **Date:** _____

McLaughlin & Harvey	IMS Doc Ref No:	PO/2/3/2/5-1956
	Process Objective:	To inform and communicate best practice in the workplace to its Employees.
	Process Owner:	Group SHEQ Director

Toolbox Talk: Archaeology

What?

- Archaeology is the study of human history through the excavation of sites and the analysis of physical remains.
- Where no other records exist, it is often the only source of information about our previous occupation of an area from the earliest inhabitants many thousands of years ago to more recent times of just a hundred years or so.
- It is not only buildings and their foundations but also artefacts such as jewellery, pottery, coins, bones and skeletons that need expert examination before removal and preservation.

Why?

- **Avoid prosecution:** it is illegal to damage some monuments and archaeological structures.
- **Avoid environmental harm:** Archaeology is an important part of our heritage and valuable and irreplaceable remains can easily be damaged on construction sites.

DO:

- ✓ Stop work if you find any archaeological features and immediately contact your manager for instructions.
- ✓ Obey the advice provided by any appointed archaeologist.

DON'T

- × Assume that any artefacts or features discovered are unimportant.
- × Remove any 'finds' such as coins, pottery, or bones from the site. It is illegal.
- × Undertake work adjacent areas of archaeological importance without considering if any damage may be caused:
  - Vibration may cause cracking
  - Dewatering may cause a preserved feature to settle and crack
- × Drive vehicles through protected sites.

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

Fishguard Linkspan Replacement

Appendix F – Site Waste Management Plan

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

Contents

1. Introduction

This plan defines the controls and mitigation measures for the effective management of waste and raw materials during the construction works at the Port of Fishguard. It aims to ensure best practice and full compliance with Stena Line requirements, current legislation, and McLaughlin & Harvey's environmental management systems and policies.

The plan will be treated as a live document and updated as necessary throughout the project to reflect changes in scope, legislation, or company procedures. All contractors and subcontractors engaged on behalf of Stena Line or McLaughlin & Harvey are required to comply with this plan for the duration of the works.

Revisions to this document will be issued via the project document management system and communicated to all relevant personnel and stakeholders.

Typical construction waste streams are expected to include concrete washings, formwork timber, reinforcement offcuts, and packaging materials associated with site operations. The waste hierarchy, as outlined below, will be applied throughout to minimise waste generation and maximise reuse and recycling opportunities.

All works will be undertaken in accordance with the following key legislation and guidance:

- Revision of the Port Reception Facilities Directive (2019/883)
- Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) Regulations 2003
- Merchant Shipping and Fishing Vessels (Port Waste Reception Facilities) (Amendment) Regulations 2009
- MSN 1678 Special waste regulations 1996
- MGN 563 Amendment 1, MGN 631, MGN 632, 2016 Amendments to MS (Port Waste Reception Facilities) Regulation 2003

2. Reducing Waste

Where practicable, steps will be taken to avoid the production of waste. For example, the use of reusable water bottles, crockery and cutlery in the welfare facilities will prevent the need for single use plastics. Where practical, requests should be made to suppliers to minimise packaging. Similarly, ordering the correct quantity and types of materials will prevent unused excess materials being disposed of as waste.

3. Reuse

Where practicable, materials arising from the construction process will be reused on site to minimise waste generation, reduce disposal volumes, and conserve natural resources. Reuse opportunities will be identified and reviewed throughout construction as part of the ongoing waste management process.

Examples include:

- **Formwork timber and shuttering –** will be cleaned, inspected, and reused wherever feasible on subsequent pours or temporary works.
- **Aggregates and excavated materials –** where suitable and approved by the Engineer, may be reused as backfill or sub-base material within the works.
- **Packaging materials –** such as pallets, cable drums, and containers, will be returned to suppliers for reuse where take-back schemes are available.
- **Steel reinforcement offcuts –** may be retained for fabrication of small components or spacers, reducing off-site disposal.

4. Recycle

Recycling will be facilitated by the segregation of waste. Clearly marked and labelled waste receptacles will be provided in designated areas. Waste suitable for recycling are likely to include wood, metals, glass, paper, plastics and oils.

5. Waste Hierarchy

We will ensure to follow the waste framework directive and adopt the waste hierarchy approach as illustrated below.

Waste Framework

The key principles of the waste management hierarchy can be identified as:

- Prevention and minimisation of waste is the preferred option;
- Where construction waste is generated, it should be source separated to facilitate recycling and maximise diversion of waste from landfill;
- Where commercial waste is generated, it should be source separated to facilitate recycling and maximise diversion of waste, including biodegradable waste, from landfill;
- Where waste may not be prevented or recycled it should be transported and disposed of in accordance with applicable legislation and without causing environmental pollution;
- Waste may only be transferred by a waste collection permit holder and delivered to an authorised waste facility.

To reduce the amount of waste produced the following best practice should be incorporated into procedures:

- Ensure building materials ordered are the correct size.
- Order the appropriate volume of materials.
- Return excess materials to the supplier if possible or advertise them to other projects within the Company.
- Avoid ordering new materials if there are existing materials available or able to be adapted to the task within the Company.

6. Waste Monitoring

The McLaughlin & Harvey Environmental Advisor will carry out regular waste compliance audits and review details of waste arisings to identify areas for opportunity to reduce or recycle more wastes in conjunction with the Site Manager.

7. Waste Management

Waste receptacles (bins and skips) will incorporate lids or covers to protect against vermin gaining access and wind blowing wastes out of skips, giving rise to litter.

We will put in place procedures for ensuring that appropriate records are kept for all waste arisings including volumes, categories and waste carriers used, and that waste transfer notes are retained.

8. Estimated Waste Production

The following is the forecasted waste outputs and embodied carbon associated with waste management, as generated via the Construction Waste Portal.

The portal's predictive analytics tool estimates not only the anticipated tonnes of waste across material streams but also the embedded carbon emissions related to waste handling, transport, treatment, and disposal. These figures help inform more sustainable decisions, enabling the project team to set realistic targets, benchmark performance, and monitor deviations over the course of construction. The data herein should be treated as a baseline and will be refined as actual waste records are collected, compared, and reconciled during delivery.

Source: https://www.constructionwasteportal.com/

**Please note that this includes only construction waste, no earthworks or demolition waste. Therefore, this may change as the project progresses.*

9. Management of Waste Streams on Site

Concrete

Cement washing will be carried out in a dedicated area. Concrete lorries will only be permitted to wash their shoots on the site. Washing arisings will be collected for onsite treatment. This will include settlement and, if required, pH correction. The liquids will be reused on site as grey water if suitable (to wash equipment), or disposed of via a consented discharge onsite route, if available. Alternatively, they will be tankered off site for disposal. The solids will be disposed of as solid waste.

Metals

All waste metal such as off-cuts of rebar metals will be stored in a designated skip and collected for recycling by the licenced waste contractor. Metal materials will be carefully managed to reduce the environmental risks and to minimise the costs.

Wood/Timber

Timber waste will be kept to a minimum through re-use throughout the project. Any timber that cannot be reused because of poor quality, etc. will be segregated and stored for recycling in a skip.

McLaughlin & Harvey have also engaged with community wood recycling scheme which collects waste timber and processes it under waste exemption for further recycling or reuse.

These materials will need to be handled carefully onsite to prevent dampness, warping of the wood and fungal attack.

Paper & Cardboard

Office paper will be collected in the recycling bin and will be collected by the licenced waste contractor for recycling as necessary.

Packaging/Mixed Recycling

Where possible, packaging will be segregated for recycling or returned to the supplier. Almost all materials delivered to the construction site will be wrapped and protected by packaging material e.g. plastic film, wooden pallets, cardboard, metal wrap, cellophane wrapping, Styrofoam etc. It is important that packaging material is managed efficiently to ensure that the site remains free of windblown and discarded packaging material.

Canteen Waste / Domestic Non-Hazardous

A licensed external waste disposal contractor, as required, transports this waste to a licensed tip. Labelled containers will also be provided for gathering plastic bottles, etc. at the main compound.
It is proposed that canteen waste will be segregated into different waste types: organic, recyclable & general. These three waste types will be disposed of separately by use of colour coded bins in the canteens and through separate skips and bins in the waste area at the compound. McLaughlin & Harvey intend to reduce the amount of waste in canteens by using reusable drinking cups, crockery and cutlery.

Glass and Other Materials

There will not be much glass used in construction, but there may be occasions when glass would be delivered through these works to other parts of the project.

Each waste type will be segregated into clearly marked separate waste skips for collection. McLaughlin & Harvey will sub-contract a suitable licenced waste contractor to collect the wastes for recycling and disposal on an as required basis.

Hazardous waste

Hazardous waste such as contaminated material like absorbents, cartridges, waste oil filters, chemicals, etc, will be stored in individually labelled containers and collected by the licensed contractor, as necessary.

Waste oil stored onsite will follow the guiding principles contained within EA GPP 8 'Safe storage and disposal of used oils'. The storage of waste oil will also follow the guidelines contained within EA GPP 2 'Above ground oil storage tanks' and will not be located within 10 m of watercourse or 50 m of a spring. The waste oil tank will either be double skinned or contained within an impermeable bund with a capacity of 110% of the oil tanks.

Waste Management Contractors, Record Keeping and auditing Protocols.

All Waste Management Contractors, employed direct or through a sub-contractor, will be appropriately licensed to remove and transfer or treat the material sent to them.

Every contractor used will have McLaughlin & Harvey's Waste Contractor Requirements sent to them with their order. This document is also circulated to any subcontractor removing waste from site. This ensures that all aspects of the Waste Duty of Care are adhered to and that disposal routes are traceable and representative of best practice.

For all waste contractors employed by McLaughlin & Harvey, we require the following:

1. Upon receipt of an order and before starting work, the waste contactor is required to send an electronic copy of their Waste Carriers Licence and all Waste Management Licences, Environmental Permits and Exemptions which will be used in relation to the site(s) which they are servicing. This should be emailed to ems@mclh.co.uk

2. A completed Waste Transfer Note which includes all of the details required by the Waste (England and Wales) Regulations 2011. Note this includes all of the following details as a minimum
    - The name and address (including postcode) of the project site and waste contactor;
    - The date and time of the transfer;
    - Description of the waste;
    - Description of the waste container;
    - Identify the waste being transferred by reference to the appropriate six-digit code in the European Waste Catalogue;
    - SIC code for McLaughlin & Harvey - 42990 for civil engineering projects;
    - The waste management licence number, exemption number or permit number of the destination site and regulation authority with whom the waste contractor is registered;
    - Signature from a representative of the waste contractor and project site.

3. For any scheduled collections e.g. wheeled bin or FEL/REL uplifts or soil/stone/excavation spoil collections via tippers, a Season Ticket Waste Transfer Note is required to cover all uplifts by the waste contactor. Season Ticket WTNs require all of the information required in (2) above but must also state the date from which collections commence to when they will finish, for a period of up to 1 year. Should collections be required for longer than 1 year, a new season ticket must be generated annually.

4. A report must be provided by the waste contactor to McLaughlin & Harvey head office detailing all waste movements from each of our sites handled by the waste contractor, including the following details:

    - Date and location of transfer;
    - Waste Transfer Note number applicable to each movement;
    - Type of waste including EWC code;
    - Container size and type used;
    - Tonnage of waste;
    - Destination facility/site of waste;
    - Recycling percentage;
    - Direct reuse percentage, where applicable;
    - Energy from waste percentage, where applicable;
    - Landfill percentage, where applicable.

This report must be provided on a monthly basis no later than 2 weeks after the reporting period, or more frequently where reasonably requested by McLaughlin & Harvey.

The reports should be emailed to: ems@mclh.co.uk

These records will be retained on site in order that they can be inspected at any time to ensure that they are complete. Reporting on waste and the compiling of project data is carried out at Head Office. Records are kept for the statutory minimum of 2 years (non-hazardous waste) or 3 years (hazardous waste).

Waste traceability and the recording of movements in line with Duty of Care is included in internal SHEQ / Environmental Audits in order that any shortcomings are highlighted in a timely fashion and any deviations corrected immediately. Documents are quality checked on a continuous basis by the site team and as part of the Environmental Team's monitoring and recording system.

10. Asbestos Management on Site

According to the Asbestos report carried out in February 2025 by ESP Environmental Ltd, nine works areas within the site were assessed. Chrysotile (white asbestos) was detected in cement arc arrestors within the DC panels and in gaskets in the old generator room in the substation area and Amosite (brown asbestos) was detected in duct lagging associated with the old generator exhaust. Any asbestos that is found will be reported to the site manager and dealt with immediately. Any ongoing work will cease to avoid further exposure, and appropriate measures will be taken.

The following outlines the management controls, monitoring arrangements, and mitigation measures that McLaughlin & Harvey will implement to ensure that any asbestos-contaminated materials are properly identified, handled, and disposed of in full compliance with current legislation and best practice, including the Control of Asbestos Regulations 2012.

Certifications and Training: We will ensure that all personnel who may come into contact with asbestos are adequately trained, competent, and medically fit to undertake such works.

Records of training, certification, and competency will be maintained and made available to CMAL upon request. Only trained operatives will be permitted to handle or supervise asbestos-related activities.

Protective Equipment: We will provide and enforce the use of appropriate Personal Protective Equipment (PPE) to prevent exposure during all asbestos-related operations. PPE requirements will be defined within task-specific risk assessments and method statements.

Disposal Procedures: Where pile arisings or excavated materials are identified or suspected to contain asbestos, we will ensure their safe handling, containment, and disposal via an appropriately licensed waste carrier to an authorised hazardous waste facility. If visible fragments of asbestos-containing material (ACM) are present, the entire waste stream will be classified as hazardous waste. Prior to disposal, all materials will be inspected, identified, and segregated to prevent cross-contamination.

Where wet sediments are encountered, treatment or drying may be required to meet landfill acceptance criteria. During temporary storage, on-site treatment, and transport, we will implement strict controls to prevent runoff to the river and minimise dust generation. All activities will comply with the project's Waste Management Plan and Environmental Permit requirements.

Documentation and Record Keeping: We will maintain comprehensive records of all asbestos-related findings and management actions, including sampling results, waste transfer notes, and disposal documentation. Residual asbestos risks will be clearly communicated within the Health and Safety File, which will include details of any known contamination or hazardous materials encountered.

Protection of the public: To prevent contaminated soils from affecting the public we will follow our dust mitigation plan to prevent any dust generation during transportation.

Watching brief: Our site manager will keep a site diary documenting each phase of remediation, they will ensure it is kept up to date, have efficient information and photographs.

Monitoring and Review: We will regularly monitor and review asbestos management arrangements throughout the construction period to ensure ongoing compliance and effectiveness. Site inspections, audits, and toolbox talks will be undertaken to verify that control measures remain appropriate and that all personnel continue to follow safe working practices.

Any changes in site conditions, work methods, or identified contamination will trigger a review and update of this plan. All revisions will be issued through the project document management system and communicated to all relevant parties to maintain full awareness and control of asbestos-related risks.