

Apply to discharge condition(s) and/or monitoring approvals required by your marine licence

Who is completing this form?

Indicate who is completing this form

Licence holder

Your project

What is the name of your project?

Hynet Carbon Dioxide Transportation and Storage Project – Liverpool Bay

Give us your marine licence reference number (this can be found on the front of your marine licence):

CML2365

Licence holder details

Please complete the licence holder details

First name: Lamia
Last name: Gherbi
Position in company: Environmental Advisor
Company or trading name: Liverpool Bay CCS Ltd
Telephone number: 07771501100
Email: Lamia.Gherbi@eni.com

Agent details:

Does the licence holder wish to be included in all correspondence?

Yes

List the condition(s) of your marine licence

List the condition(s) of your marine licence that you are looking to discharge, including any monitoring reports. Please include the condition number and condition text.

3.26 Marine Mammal Management Plan (MMMP)

3.26.1 The Licence Holder must submit a MMMP which shall be in accordance with Outline MMMP (CML2365-LBA CCS Ltd_OFFSHORE ES_Appendix S MMMP_NRW_FINAL) to the Licensing Authority for written approval at least 4 months prior to commencement of the Licensed Activities. No Licensed Activities may be undertaken prior to written approval from the Licensing Authority.

3.26.2 The Licence Holder must ensure that any actions outlined in the documents detailed in condition 3.26.1 are implemented as approved in writing by the Licensing Authority. Any proposed changes to the actions outlined in the documents must be submitted to, and approved in writing by the Licensing Authority prior to any changes being enacted.

Please provide a description of your request e.g. Construction Environment Management Plan submitted for approval prior to commencement of works/ submission of annual monitoring report for approval

I appreciate that this request is being made at relatively short notice, and I would be very grateful if you could give the attached proposed amendment to the LBCCS Marine Mammal Management Plan (MMMP) Revision C (green highlights) your early consideration and, if possible, provide comments or confirmation of acceptance by Friday 25 September.

As previously advised to NRW, we anticipated that a further amendment to the MMMP might be required once the detailed offshore installation methodology had been finalised. Recent confirmation of the operational piling sequence, together with a clearer understanding of the engineering and programme implications associated with interruptions between piling events, has now confirmed the need for this amendment.

The proposed changes are intended to maintain the required level of protection for marine mammals whilst allowing the piling sequence to be completed in a manner that is both operationally and technically practicable. The amendment does not seek to increase the amount of piling activity assessed within the approved MMMP. Rather, it seeks to avoid unnecessary interruptions and repeated mitigation sequences that would prolong the overall duration of the piling campaign and extend the period over which marine mammals may be exposed to construction activity.

The operational challenge arises from the confirmed installation methodology, which requires the eight piles to be installed in two batches of four. Based on the durations set out in the approved plan, each batch requires approximately 8 hours and 40 minutes of continuous piling activity, with the overall installation requiring approximately 24 hours. Where commencement is permitted at any time of day, the works can reasonably be completed over two days, allowing sufficient flexibility to accommodate routine operational factors such as vessel positioning, equipment checks, weather conditions, and other short-duration interruptions.

Under the current daylight-only restriction, however, each batch effectively needs to be completed within a single daylight period. By mid-October, the available daylight window provides less than one hour of contingency beyond the estimated duration required to complete a batch. Consequently, even minor interruptions could prevent completion of the planned sequence and require the remaining piles to be deferred to a subsequent day. As daylight hours continue to reduce later in the season, the available working window becomes shorter than the duration required to complete a batch, making completion of a four-pile sequence within a single daylight period increasingly impracticable.

This creates both programme and engineering challenges. Interruptions to the established piling sequence introduce inefficiencies in vessel operations, require repeated mobilisation of mitigation measures and Protected Species Observer coverage, and increase the risk of delays arising from weather, sea state, and other operational constraints. The practical consequence is that an activity which could otherwise be completed over approximately two days may extend to four days or more. This would increase vessel time offshore, prolong construction activity, extend the duration of environmental disturbance, and increase project costs, without delivering any additional environmental benefit beyond that already provided by the approved mitigation measures.

The proposed amendment therefore adapts the mitigation arrangements to the now-confirmed installation sequence, including measures that will allow commencement or recommencement during

periods of darkness or reduced visibility while maintaining an appropriate level of protection for marine mammals. The detailed justification, assessment, and proposed mitigation measures are provided within the attached document.

We recognise that we are asking NRW and the consultees to consider this proposal within a particularly short timeframe, and we apologise for the limited notice. Unfortunately, the full operational implications of the confirmed installation methodology have only recently become apparent. A timely determination is important because, in the absence of an approved amendment, LBCCS will be required to continue operating under the existing protocol, which is likely to result in a significantly extended piling programme compared with the proposed revised approach.

We would therefore be extremely grateful if NRW, NRW Advisory, JNCC and Natural England could review the proposal as a priority and, if possible, provide any comments or confirmation of acceptance by Friday 25 September.

Should any additional information or clarification assist your review, please do not hesitate to contact us and we will respond as quickly as possible.

Many thanks for your assistance and for accommodating this request at short notice.

List all supporting information submitted for this request

LB CCS-MMMP for CML2365 Condition 3.26_RevC

Upload your supporting information

- File: LB CCS-MMMP for CML2365 Condition 3.26_RevC.pdf - [Download](#)

Public Register

We will normally put all the information in your submission on a public register unless NRW approve of the reasons for withholding all or part.

Do you consider any of the information provided should not be placed on the public register for reasons of being commercially sensitive or in the interest of National Security?

No

Application fee

Does your submission contain monitoring related work? This could include looking to get approval for monitoring specification prior to commencement of monitoring work, or submission of monitoring reports for approval. All requests including monitoring work packages will be charged at an hourly rate and invoiced in arrears.

No

Application fee part 2

Is your application related to a band 3 licence?

If you are unsure please review you application form or contact the Marine Licensing Team at marinelicensing@cyfoethnaturiolcymru.gov.uk (opens in new tab) – for all band 3 licences you will be charged at an hourly rate and invoiced in arrears.

Yes

Payment Details for Discharge of conditions of a Band 3 licence and/or any request associated with monitoring approval

For all Band 3 Licenses as well as conditions associated within monitoring work packages, you will be charged at an hourly rate and invoiced in arrears. Please provide your invoicing details:

Purchase order number:	No Mumber Required
Invoice to be marked for the attention of:	Mark Yates
Customer name:	Liverpool Bay CCS Ltd
Address for invoice:	Eni House 10 Ebury Bridge Road
Postcode:	SW1W 8PZ London
Telephone:	020 734 46247
Mobile:	07471669586
Email:	mark.yates@eni.com

Declaration by licence holder

Applications cannot be processed unless signed by the licence holder (not agent), the applicant must have appropriate level of authority within the company. Applications will not be processed unless signed.

Complete declaration name and date

First name:	Lamia
Last name:	Gherbi
Position in company:	Environmental Advisor
Date (DD/MM/YYYY):	18/09/2026

I declare that to the best of my knowledge and belief that the information given in this application form and supporting documentation is true.

WARNING: It is an offence under the Marine and Coastal Access Act 2009, to fail to disclose information or to provide false or misleading information.

Yes

Submit your application

Enter the email address you'd like a copy of your application sent to:

Lamia.Gherbi@eni.com