



HAVFRUE

Attachment G

Communication Strategy Scotland TS & EEZ

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Issue: 1.0

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Issue Status & Document History Record

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Revision History

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Amendment / Additions / Deletions etc.

Section	Change
1. Introduction	Initial Issue
2. Communications Strategy	Initial Issue

List of Abbreviations

cm	Centimetre
CES	Centre for Environment, Fisheries and Aquatic Services
CMS	Construction Method Statement
EEZ	Exclusive Economic Zone
HMG	Her Majesty's Coastguard
JNCC	Joint Nature Conservation Council
KIS-ORCA	Kingfisher Information Service Offshore Renewables and Cable Awareness
MCG	Marine and Coastguard Agency
MoD	Ministry of Defence
MS	Marine Scotland
MRCC	Maritime Rescue Coordination Centre
NFFO	National Federation of Fisherman's Organisations
NLB	Northern Lighthouse Board
NTM	Notice to Mariners
OOS	Out-of-Service
PLIB	Post-lay Inspection and Burial
PLGR	Post-lay Grapnel Run
ROV	Remotely Operated Vehicle
RYA	Royal Yacht Association
SEPA	Scottish Environmental Protection Agency
SFF	Scottish Fisherman's Association
SNH	Scottish National Heritage
TS	Territorial Seas
UKHO	UK Hydrographic Office
UKICPC	United Kingdom International Cable Protection Committee
WDC	Whale and Dolphin Conservation

Table of Contents

Notices.....	ii
Disclaimer.....	ii
Usage Instructions.....	ii
Copyright.....	ii
Issue Status & Document History Record.....	iii
List of Abbreviations.....	iv
1 INTRODUCTION.....	1
1.1 Purpose of Communication Strategy.....	1
2 COMMUNICATION STRATEGY.....	2
2.1 Stakeholder Identification.....	2
2.2 Communication During Installation.....	3
2.2.1 Notifications.....	3
2.2.2 Communication with Marine Scotland.....	4
2.2.3 Other Subsea Infrastructure Owners.....	4
2.3 Post completion.....	5

1 INTRODUCTION

This Communication Strategy has been developed as part of the Marine Licencing process, and details the liaison procedures that will be followed by the Havfrue Project Team for the dissemination of information in relation to the cable survey, installation and protection activities within the Scottish Terrestrial Sea (TS) and Exclusive Economic Zone (EEZ) to the fishing industry and other legitimate users of the sea.

The Communication Strategy details how communication will be followed during all stages of the project's life cycle: prior to, during, and after the installation of the Havfrue subsea cable.

The Project is applying for the following marine licences:

- 1) Installation of a subsea cable within 12 nautical miles (nm) (Scottish TS);
- 2) Rock placement at nine infrastructure crossing locations outside 12 nm.

TE SubCom, as the system installer, will be responsible for communication activities in advance of and through completion of the subsea cable installation.

1.1 Purpose of Communication Strategy

This Communication Strategy defines procedures for the distribution of information relating to the cable installation, survey activities and rock placement (cable protection) to the fishing industry and other legitimate users of the sea. The Communication Strategy includes details of the timing, format, and method(s) of distribution for the following information:

- Notices of operations including, but not limited to: out of service (OOS) cable clearance and pre-installation seabed clearance, cable laying, cable protection, and post-installation survey;
- Details on cable protection, including expected berm heights relative to sea bed (this information must be distributed at least four weeks prior to commencement of any rock placement);
- Notices of hazards to fishermen and other legitimate users of the sea and;
- As-laid position of cables and protection including berm heights relative to sea bed.

The aim of the Communication Strategy is to enable the Project to have a clear and readily implemented plan in place that meets the relevant requirements set out by Marine Scotland.

2 COMMUNICATION STRATEGY

2.1 Stakeholder Identification

The following stakeholder groups have been identified for consultation and notifications. The Project will engage with statutory and non-statutory stakeholders prior to, during and/or upon completion of certain work activities.

Table 1..... Stakeholders Identified for the Havfrue Subsea Cable Project

Category	Groups Identified to Date
Statutory Consultees to Marine Scotland: <i>Agencies consulted during the scoping, project design and Marine License application stages</i>	<ul style="list-style-type: none"> • Scottish National Heritage (SNH) (up to 12nm) • Joint Nature Conservation Council (JNCC) (outside 12nm) • Scottish Environmental Protection Agency (SEPA) • Marine & Coastguard Agency (MCA) • Northern Lighthouse Board (NLB) • Ministry of Defence (MOD)
Fishing Groups	<ul style="list-style-type: none"> • Scottish Fishermen's Federation (SFF) • Orkney Fisheries Association • Shetland Fisheries Association • National Federation of Fishermen's Organisations (NFFO) • Kingfisher Information Service Offshore Renewables and Cable Awareness (KIS-ORCA)
Other Marine Users and Interest Groups	<ul style="list-style-type: none"> • Other subsea infrastructure owners • Whale and Dolphin Conservation • Ferries Associations • UK Hydrographic Office • Shetland Island Council • Royal Yachting Association

2.2 Communication During Installation

2.2.1 Notifications

The Project will aim to provide at least 20 days' notice for all activities (with the exception of *force majeure* circumstances). Notifications will be sent and distributed through the following channels:

Notice to Mariners (NTM): NTM and/or radio navigational warnings and publications in appropriate bulletins will be used to inform legitimate users of the sea of the proposed work activities. Hydrographic Note H 102 will be used to issue the NTM during all stages of the work as listed below:

- Route Clearance of Out-of-Service Cables
- Pre-Lay Grapple Run (PLGR)
- Cable Installation
- Rock Placement
- Post-Lay Inspection and Burial (PLIB)

The applicable form, Hydrographic Note H102 – For General Information will be sent via email to the following recipients:

- Source Data Receipt at UK Hydrographic Office, Kingfisher Information Service
- Marine Scotland
- Shetland Coastguard Operations & Maritime Rescue Coordination Centre (MRCC)
- JNCC
- SNH
- Scottish Fishermen's Federation
- Whale and Dolphin Conservation
- Orkney Fishery's Association
- Shetland Fishery's Association

Each NTM will contain full details of the vessel, activities, contact details, location etc. The NTM will be issued at least 20 days prior to activity's start to allow inclusion in the Kingfisher Fortnightly Bulletin. In the case of an emergency or incident, the NTM will be issued as soon as reasonably possible (this might mean that there is not time for the NTM to be issued in the Kingfisher Bulletin).

NTM updates:

Although it is envisaged that all issued NTMs will describe in detail the planned activities, a significant change of activities might become necessary. An update will be issued by email to Source Data Receipt at the UK Hydrographic offices and copied to the distribution list set out in the Notice to Mariners section above.

a) Subsea Cable Awareness Flyers:

Awareness Flyers provide fishermen with accurate information about offshore projects and activities in UK waters. They are published through the Kingfisher Information Service and Fishing News. The Project plans to issue one flyer for the offshore installation activities (2019). The flyer will be issued at least 4 weeks prior to the offshore activities commencing.

b) Notice to fishermen to allow for gear clearance:

- Notice to mobile gear fishermen: Fishermen using mobile gear will receive NTM as described above. However, fishermen affected by the installation activities will be given a minimum of 24 hours' notice to remove their gear from the working area(s) of vessels of restricted mobility.
- Notice to static gear fishermen: Fishermen using static gear will receive NTM as described above. A dedicated outreach effort will take place between TE SubCom's FLM and fishermen who will be affected by the installation operations, to agree on the detailed arrangements for removal of static gear.

This will include details of dates and numbers of creels. The liaison takes place nominally one week to one month prior to the planned commencement of the installation operations.

2.2.2 Communication with Marine Scotland

Marine Scotland is the licensing authority for the installation of the cable within 12 nm and as such all permit conditions must be met. Thus, MS will be contacted before, during and after the work activities:

1. Contact prior to commencement of work:
 - Notification of commencement of work;
 - To submit and seek approval of any updates to the Cable Plan;
 - To submit and seek approval of any updates to the FLMAP;
 - To submit and seek approval of the Communication Strategy;
 - To submit and seek approval of a Construction Method Statement (CMS) and any subsequent updates if necessary; and
 - To agree recipients of real-time data relating to the planned works.
2. During the works for the following purposes:
 - To allow access for an authorized Enforcement Officer to inspect the works;
 - To notify any changes to the works that may affect the validity of the licence; and
 - To submit and seek approval of plans to mitigate navigational dangers or risk, where required.
3. On completion of the works:
 - To notify the completion of the works; and
 - To submit final RPL's for the cable.

2.2.3 Other Subsea Infrastructure Owners

Crossing negotiations have been underway for cable and pipeline crossings since the early stages of the Project, and will be finalized in advance of installation. Regular communication will be maintained between the cable and pipeline owners and TE SubCom to ensure awareness of planned and ongoing works. An example of the planned notification schedule for a subsea infrastructure crossing is provided below (to be specified in the agreements):

- First Notification: 28 days prior to system installation commencement
- Pre-Lay Inspection Notification: 24 hours prior to commencement of Pre-Lay Inspection
- 1st Bottom Rock Placement Notification: 7 days prior to commencement of bottom Rock Placement
- 2nd Bottom Rock Placement Notification: 24 hours prior to commencement of bottom Rock Placement at pipeline location
- 3rd Bottom Rock Placement Notification: 24 hours after bottom Rock Placement is completed at pipeline location
- 1st Cable Lay Notification: 7 days prior to crossing pipeline
- 2nd Cable Lay Notification: 48 hours prior to crossing pipeline
- 3rd Cable Lay Notification: 24 hours prior to crossing pipeline
- 4th Cable Lay Notification: 500m after crossing pipeline
- 1st Notification - Post Lay Inspection and Burial/trenching Operations (PLIB): 7 days prior to commencing PLIB operations
- 2nd PLIB Notification: 24 hours prior to commencing PLIB operations
- 3rd PLIB Notification: 24 hours after completing PLIB operations
- 1st Top Rock Placement Notification: 7 days prior to commencement of top Rock Placement
- 2nd Top Rock Placement Notification: 24 hours prior to commencement of top Rock Placement at pipeline location
- 3rd Top Rock Placement Notification: 24 hours after top Rock Placement is completed at pipeline location

2.3 Post completion

Upon completion of the installation of the Havfrue Cable System, TE SubCom will provide the as-laid RPL to the appropriate agencies, including the Crown Estate Scotland, and UK Hydrographic Office, and Marine Scotland as required. Other organisations that will be notified include MCA, KIS-ORCA, SFF, and others as specified in permit requirements and/or regulations.

Within one week of completion of the cable installation, TE SubCom will notify Marine Scotland of the completion of the operations relating to the marine licence.