

SAC Noise Management Regulators Working Group Progress Report 2024

Contents

1. Introduction	2
2. Managing noise levels below thresholds in Special Areas of Conservation	2
3. Implementation of MMO's Noise Management Approach for 2024	2
4. Coordination of noisy activities	3
a) Creation of Development Coordination Forums	3
b) Coordination and Facilitation Frameworks	4
c) Development of the Marine Noise Registry	4
4. Unexploded Ordnance Clearance	5
a) Recommendations for Marine UXO Surveying and Investigations	5
b) Best practice recommendations for UXO clearance	5
c) Unexploded Ordnance Joint Position Statement and Guidance	5
d) UXO Clearance Trials	6
5. Managing Piling Noise.....	6
a) Delivery of MMO Noise Reduction Systems Workshop.....	6
b) Marine Noise Policy Paper	7
c) Design of a piling noise limit	7
d) Offshore Wind Noise Pilot Programme.....	8
5. International coordination and engagement.....	8
a) MONMER regulators forum	9
b) OSPAR Regional Action Plan for underwater noise	9
6. Mapping and recording of impulsive noise levels in the SACs between 2022 and 2024	9

1. Introduction

The aim of the Special Areas of Conservation (SAC) Noise Management Regulators Working Group (herein referred to as 'The Group') is to share information on industry operations and work towards strategic planning and the management of impulsive noise from the development of offshore energy industries in 5 harbour porpoise SACs, which include the Southern North Sea (SNS), North Anglesey Marine, Bristol Channel Approaches, North Channel and West Wales Marine.

During 2024, the Group met monthly, with representatives from the Marine Management Organisation (MMO), the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED), the Ministry of Defence (MoD), Natural Resources Wales (NRW), the Department for Environment, Food and Rural Affairs (Defra), the Department for Energy Security and Net Zero (DESNZ) and the Department for Agriculture, Environment and Rural Affairs (DAERA). Quarterly meetings were held with Statutory Nature Conservation Bodies (SNCBs) and the Marine Directorate of Scottish Government to ensure join up on noise management. Between these meetings, progress has been made on a range of priorities, as set out below.

2. Managing noise levels below thresholds in Special Areas of Conservation

Since 2019, harbour porpoise SACs have been designated under the [Conservation of Habitats and Species Regulations 2017](#) to maintain important habitats for this species. Through the SNCB guidance, disturbance thresholds have been set in these SACs to prevent the favourable conditions of the habitat being lost and therefore preventing adverse effects on the site integrity. The thresholds ensure that no more than 20% of the seasonal area (summer/winter) a day, and 10% on average over a season (summer/winter), is unavailable to harbour porpoise resulting from noise disturbance.

In autumn 2023, regulators identified that there was potential for high levels of noise disturbance in summer 2024. This was due to several projects from different offshore industries submitting detailed work schedules to support applications for consent / requests to discharge Site Integrity Plans (SIPs) which demonstrated that multiple projects planned to work simultaneously within the SNS SAC. The worst-case scenario identified that the thresholds for the SNS SAC would be breached (with approximately 50% disturbance daily and seasonally) without appropriate aligned management from regulators.

As a result of the activities set out in this progress report, including implementing a bespoke noise management approach for 2024 and industry engagement through a coordination forum for the SNS SAC, noise levels were successfully kept below the 20% daily threshold and the 10% seasonal threshold and adverse effects on the site's integrity were prevented.

In summer 2024 in the SNS SAC, analysis to date shows that the maximum daily level of disturbance was 18.77% (below the daily disturbance threshold of 20%) and the seasonal level of disturbance reached 3.82% (below the seasonal disturbance threshold of 10%).

3. Implementation of MMO's Noise Management Approach for 2024

To prevent any breaches to the thresholds from occurring, the MMO and OPRED worked cooperatively to determine options available. As there were more offshore wind-related

activities proposed to take place, the MMO investigated a management approach for the summer period to ensure consistency across consents. Following extensive discussions with the MMO's Marine Licensing and Marine Conservation Team, as well as other regulators, policymakers, SNCBs, and relevant offshore wind developers, the MMO's Strategic Renewables Unit was able to utilise the best available evidence for a proposed management approach for consenting.

The output of this management approach focused on piling and unexploded ordnance (UXO) clearance. For piling, this was:

- Encouragement for the voluntary use of noise abatement systems (NAS) during 2024,
- Requirement for collaboration*,
- Request to work outside the summer period as far as possible,
- Requirement for regular updates to regulators.

For UXO clearance:

- Use of a two-licence approach, as outlined in the MMO's 2023 "short-term management measures" workshop for UXO surveying and clearance,
- Low order clearance must be utilised in the first instance. Only if this fails after three attempts, may high order clearance be considered,
- High order should only be used by exception and must use NAS,
- Encouragement of consideration for lift and shift approach,
- Maximum of three high order clearances may be consented per campaign, pending variations to justify the need for further contingency,
- Requirement for collaboration*,
- Regular updates required to regulators.

It was determined that these were the best options for a 2024 management approach due to existing constraints highlighted by industry, current policy requirements and best available evidence.

*To support the requirement for collaboration across industries, regulators set up a Development Coordination Forum.

4. Coordination of noisy activities

a) Creation of Development Coordination Forums

Following the potential challenges with managing underwater noise disturbance during 2024, regulators set up a "Development Coordination Forum" for projects planning to work during the summer season. This was to enable improved communication and collaboration across the industry sectors, with regulators overseeing discussions and facilitating active management through developer-led simultaneous operations (SIMOPs) discussions. SIMOPs calls involved discussion of proposed daily contributions, with a 7-day forward and backward look, which were then communicated to regulators.

The Group helped to shape and design the forum meetings. Three Forum meetings were held during 2024 to discuss any pinch points and/or challenges industry required further

support with. These meetings were hosted by Offshore Energies UK, with trade representatives in attendance alongside relevant industry projects.

Due to potentially sensitive information shared, the Forum is invitation-only from regulators based on projects planning to work during the summer season. In late summer, regulators share a call for information for the following summer season to identify relevant parties.

Further meetings will be held for the 2025 summer season, with the future of the Forum being agreed on an annual basis dependent on requirement. Given the expected high levels of activity anticipated for future years, it is increasingly important for regulators to receive information on any potential activities as early as possible to ensure coordination is as effective as possible.

b) Coordination and Facilitation Frameworks

Alongside the development of the forums, members of the Group have been involved in monthly calls with the Offshore Wind Industry Council (OWIC)'s Pathways to Growth workstream to further discuss and refine coordination approaches. The OWIC funded the consultant, Xodus, to develop coordination and facilitation frameworks to address the potential underwater noise conflicts in the SNS SAC. Defra, DEZNZ and MMO have been involved in stakeholder engagement sessions for this work and provided feedback through the development of the framework. The Xodus report has been discussed thoroughly at several Group meetings. The Group look forward to receiving the final report. The final outcomes will be considered by the Group and implemented where agreed.

c) Development of the Marine Noise Registry

The Marine Noise Registry (MNR), established in 2015, is a custom-built database which collects data on activities in UK waters that result in impulsive noise such as seismic and sub-bottom profiler surveys, impact pile driving, and explosives. The MNR is managed by JNCC.

The MNR underwent a second phase of upgrade developments throughout 2023 funded by Defra and the MMO, with the purpose of developing the MNR into a useful tool for coordination. The Phase 2 upgrade resulted in a beta version of the upgraded MNR system being released to users in October 2023. Phase 2 developments included the development and implementation of the 'Disturbance Tool' and 'Cooperation Discussions' functionalities, as well as a more refined User Interface with consideration of feedback collected during user research sessions. During the development of Phase 2, members of the Group (Defra, MMO, DESNZ and OPRED) undertook testing sessions of the Disturbance Tool run by JNCC. The testing sessions introduced the updated Disturbance Tool to members of the group and identified areas where the functionality of the Tool could be further improved.

Using the feedback provided during and after the testing sessions, JNCC identified potential areas of improvement to be addressed. Throughout 2024, members of the Group, together with JNCC, reviewed the proposed areas of improvement contributing to shaping the scope of the next phase of upgrades to improve the functionality of the MNR. A Phase 3 upgrade is now in progress, funded by Defra and managed by JNCC, to further improve the user experience for data input and outputs and enhance functionalities. This will help with data

collection and data outputs to facilitate the management of noise, particularly in harbour porpoise SACs.

4. Unexploded Ordnance Clearance

a) Recommendations for Marine UXO Surveying and Investigations

Research and best practice recommendations were commissioned by Defra to assist regulators, advisors, and those in the offshore industry in the planning of surveys of UXO on the seabed. This resulted in the development of best practice recommendations for UXO surveys and a supporting workshop summary report.

When data on UXO is lacking, this can cause an over-inflated worst-case scenario of numbers of potential UXO on the seabed. This means that assessments can become unnecessarily lengthy and protract the consenting process, as well as taking up vital headroom below noise disturbance thresholds in harbour porpoise SACs.

The scope of these best practice recommendations was therefore to advise on how to better undertake UXO surveys and investigations to improve accuracy and prevent over-inflated numbers of potential UXO to support accelerated offshore wind deployment. Members of the Group were involved throughout the project.

The published report for this project can be found [here](#) on Defra's Science Search website. This has supported discussions amongst the Group and informed the MMO's recommendations for a two-licence approach for UXO surveying and clearance.

b) Best practice recommendations for UXO clearance

The acceleration of offshore wind and associated construction increases the possibility of encountering UXO on the seabed. Effective management of UXO clearance is essential for sustainable offshore wind development and to minimise environmental impacts of high marine noise on vulnerable marine species.

Defra funded a project to develop best practice recommendations for UXO clearance. A literature review was undertaken, followed by a series of workshops and bilateral discussions with a range of stakeholders, including the explosive ordnance disposal industry, developers, regulators and SNCBs. The aim was to build consensus, learn from experience and agree a series of recommendations for UXO clearance to minimise environmental impacts and consenting risks.

Members of the Group were closely involved in these discussions and the work informed the revised update to the UXO Joint Position Statement and development of supporting guidance.

The published report for this project can be found [here](#) on Defra's Science Search website.

c) Unexploded Ordnance Joint Position Statement and Guidance

In response to the emerging evidence, best practice recommendations from stakeholders (including the reports above), and experience of recent UXO clearances, a revised UXO Joint Position Statement supporting guidance has been developed.

The Group provided input as joint signatories to the updated [Unexploded Ordnance Joint Position Statement](#) and [Supporting Guidance](#), published in January 2025. The joint statement sets out the collective position on clearing UXOs within the UK marine environment, in relation to commercial marine developments. Signatories include:

- Defra
- DESNZ
- MMO
- Scottish Government
- Welsh Government
- NRW
- DAERA
- JNCC
- Natural England
- NatureScot
- MoD

The updated statement sets out that: for commercial marine developments, low noise clearance should now be the default, with loud detonations restricted to extraordinary circumstances where low noise clearance cannot be undertaken, or as a last resort.

The guidance should be read in conjunction with the Unexploded Ordnance Joint Position Statement and supports marine users to minimise environmental impacts when clearing unexploded ordnance within the UK marine environment, in relation to commercial marine developments.

d) UXO Clearance Trials

Throughout 2024, Defra, together with The Crown Estate's Offshore Wind Evidence and Change Programme, funded a final round of quarry trials to test emerging technologies that clear UXO in a quieter manner. Three new technologies are being tested to gather noise data from a controlled environment, with a view to providing clear evidence of the efficacy of each technology to broaden the UK supply chain for low-noise clearance methods.

Members of The Group have fed into the design of this project and will review outputs in due course when the project completes in 2025.

5. Managing Piling Noise

a) Delivery of MMO Noise Reduction Systems Workshop

On the 13th of March 2024, the MMO's Strategic Renewables Unit collaborated with the MMO's Marine Conservation Team and Marine Licensing Team to conduct a workshop on noise reduction methods for piling activities. The workshop focused on the SNS SAC due to

medium-term noise threshold concerns (2025-2027). Over 70 participants from industry and government attended.

Key considerations included:

- Significant differences in the licensing and consenting processes between marine sectors made coordination difficult for industry. These issues required regulatory reform, which was not expected in the short or medium term, meaning alternative approaches were therefore necessary.
- Regulators were keen to understand the costs associated with delays in obtaining consent compared to the costs of adopting noise reduction technologies. Industry was encouraged to weigh these factors carefully.
- Although secondary noise reduction technologies like bubble curtains are commonly used, primary technologies like vibro-hammers had limited evidence. The industry sought assurance that these could still be considered.
- Concerns were raised about the transparency of data supporting Effective Deterrence Ranges (EDRs). EDRs are now being reviewed through a Defra-funded project and managed by JNCC. Whilst this is being delivered, regulators were open to receiving revised proposals for EDRs in the meantime, if supporting evidence was provided.

The main challenges to implementing noise reduction techniques included higher costs and limited vessel availability. However, it was also clear from suppliers of noise reduction systems that there are a range of technologies that would be available for use in late 2024 onwards. The key takeaway was that reducing noise would become increasingly necessary as policies evolved, aiding noise management in the SNS SAC and building evidence for technologies ahead of potential piling limits.

b) Marine Noise Policy Paper

The Group contributed to Defra's [Marine Noise Policy Paper](#), which was published in January 2025. The Group reviewed the paper and provided appropriate input. The paper sets out the work done so far by the UK government in managing marine noise, and the next steps intended to be taken. The paper sets out the expectation that, from January 2025, all offshore wind pile driving activity across all English waters will be required to demonstrate that they have utilised best endeavours to deliver noise reductions using primary and / or secondary noise reduction methods in the first instance.

c) Design of a piling noise limit

Due to the increased levels of noise anticipated over the coming years, it will be increasingly difficult to determine no adverse effects on site integrity for harbour porpoise SACs. Defra is developing a piling noise limit which could significantly reduce the noise produced during the construction of offshore wind developments contributing to ensuring the Clean Power by 2030 Mission is delivered sustainably and in a way that continues to protect and enhance our marine environment.

Members of the Group were involved in the Offshore Wind Environmental Standards (OWES) Steering Group, chaired by Defra, which included the initial development of the piling noise limit. The Group members included DESNZ, MMO, NRW, DAERA, Scottish Government and JNCC. The Group met fortnightly to discuss the development of all OWES, with the group advising Defra on routes to implementation including how standards would be assessed, regulated and consented.

The piling noise limit is being taken forward separately from the remainder of the OWES to support development at pace. The Group will continue to discuss and refine regulatory and management options of any potential noise limit, which will subsequently be subject to a public consultation to gather a range of stakeholder views.

Between June 2023 and June 2024 members of the Group contributed to the Defra-funded project '[A noise limit for offshore wind piling driving: feasibility assessment and pilot programme design](#)' as part of the project's Steering Group. Steering Group members included DESNZ, MMO, NRW, JNCC and Natural England. The Steering Group provided direction during the project and reviewed all reports.

The project ran from June 2023 to June 2024. It investigated the feasibility of introducing an offshore wind piling noise limit in English and Welsh waters and designed a pilot programme to trial the piling noise limit and use of noise reduction systems at sea. The project investigated ten-year piling scenarios based on interviews with industry experts to predict piling noise based on expected hammer energy, pile size and pile locations. A review of noise abatement systems was then undertaken.

This data, along with auditory data of vulnerable marine species was used to propose options for feasible and achievable piling noise limits. The final part of the project designed the methodology to test the proposed limits.

The published reports for this project can be found [here](#) on Defra's Science Search website.

d) Offshore Wind Noise Pilot Programme

In November 2024, Defra secured funding from The Crown Estate's Offshore Wind Evidence and Change programme to collaborate with offshore wind developers to undertake a pilot programme to test noise abatement and noise reduction technologies in English waters on upcoming offshore wind developments. The pilot programme will test the proposed limits produced as part of the feasibility study in real-world conditions.

The findings of the pilot programme will contribute to Defra's consideration of implementing any future noise limit, subject to public consultation and Ministerial agreement. Members of the Group will continue to provide support to the development of the piling noise limit, alongside steering the pilot programme through a dedicated Project Advisory Group (PAG), where the MMO and DESNZ are members alongside SNCB, eNGO and industry representatives. During 2024, the PAG has reviewed and commented on the pilot project scope.

5. International coordination and engagement

a) MONMER regulators forum

Management of Ocean Noise by Multinational Energy Regulators (MONMER) was created by the Bureau of Ocean Energy Management (BOEM) after a first initial virtual meeting in March 2024, with the first Annual General Meeting taking place in Washington in June 2024. Representatives from The Group in attendance were Defra, DESNZ, OPRED, JNCC and the MMO.

The United States (US) administration set goals of reaching 30GW offshore wind by 2030 and 50GW by 2035. As offshore wind is a relatively new endeavour for the US, BOEM created MONMER to encourage continuous work together by engaging with international counterparts and sharing collective knowledge on ocean noise.

The Group will continue to work closely with international counterparts including the US and Australia through international multilateral fora to share information and collaborate on scientific, technological, and regulatory issues as they relate to marine noise.

b) OSPAR Regional Action Plan for underwater noise

In 2024, The Group continued to work with all other contracting parties in OSPAR to agree a regional action plan (RAP) for the North-East Atlantic by 2025, setting out a series of national and collective actions to reduce underwater noise pollution.

Members of The Group attended the ICG Noise meeting in January 2024, the HELCOM/ICG Noise meeting in September 2024, the ICG Noise Extra in October 2024, along with various stakeholder sessions for the RAP throughout 2024. The Group has fed into the drafting of the RAP, coordinated by Defra, and will continue to do so with a view to the RAP being approved and implemented from 2025.

6. Mapping and recording of impulsive noise levels in the SACs between 2022 and 2024

In collaboration with members of The Group, JNCC has produced a new report that summarises mapping of impulsive noise in the harbour porpoise SACs from October 2022 – March 2024. Activities' close out data (e.g. noise sources, location and dates) were submitted to the MNR, enabling retrospective analysis of the potential disturbance footprints. In this report, the prevalence of noise events, their distribution in time and space and the contribution of the different activities to the overall disturbance footprint are investigated, for all harbour porpoise SACs in England, Wales and Northern Ireland, in the winter of 2022–2023, the summer of 2023, and the winter of 2023–2024. More detail is provided for the Southern North Sea (SNS) SAC since this had by far the highest levels of noisy activity. The report confirms that the daily 20% and the seasonal average 10% thresholds were not exceeded in any of the three seasons covered by this report.

The report can be found on JNCC's website [here](#).