Improving every journey

Delivery plan
Environmental management plan

Published 31st March 2026

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Section 1
Environmental management plan overview

Executive Summary

Caledonian MacBrayne is committed to delivering safe, sustainable and environmentally responsible ferry services across Scotland's west coast. This Environmental Management Plan (EMP) sets out our overarching approach to environmental stewardship across the Clyde and Hebrides Ferry Services (CHFS3) network.

The EMP acts as a parent plan, providing the strategic framework for how we manage environmental responsibilities, comply with legislation, minimise impacts and drive continuous improvement. Beneath this parent plan sit a series of detailed sub-plans, each addressing a specific environmental theme. Together, these components form a comprehensive and coordinated environmental management system that supports day-to-day operations and long-term sustainability goals.

Through clear governance, defined responsibilities and active monitoring, the EMP ensures we protect the natural environment, reduce emissions, support biodiversity and meet the expectations of customers, communities and regulators. It will be reviewed regularly to reflect emerging legislation, new best practice and evolving operational needs.

1. Introduction

Caledonian MacBrayne operates in some of Scotland's most sensitive marine and coastal environments, and we recognise our responsibility to manage environmental impacts with care, transparency and continuous improvement. This Environmental Management Plan (EMP) provides the parent level framework for how we fulfil our environmental obligations and how environmental considerations are embedded across all areas of our operations.

The EMP sets out our organisation wide approach to environmental governance, compliance, performance monitoring and risk management. It also establishes the structure within which a series of thematic subplans sit. These subplans provide the detailed arrangements, actions and procedures for specific areas such as waste, energy, ecology, air quality, climate adaptation and pollution response.

By bringing these elements together under a single parent plan, we ensure consistency, alignment and clarity across all environmental activities. This structure supports accountable decision making, coordinated delivery and transparent reporting, enabling us

to protect the environment and support the communities we serve while delivering reliable, safe ferry services.

Environmental management is a shared responsibility across Caledonian MacBrayne. Every employee, contractor and partner plays a role in preventing pollution, reducing emissions, supporting biodiversity and using resources responsibly. The EMP, supported by its sub-plans, provides the framework and tools to help us do this effectively.

2. Environmental policy

At Caledonian MacBrayne, we recognise our responsibility to protect the unique environments in which we operate and to minimise the impact of our activities across Scotland's west coast. Our Environmental Policy sets out our commitment to managing our operations in a way that is sustainable, compliant and aligned with the long-term needs of the communities we serve.

We are dedicated to reducing emissions, preventing pollution, protecting biodiversity and using resources efficiently across our vessels, ports and shoreside facilities. These commitments apply to everyone working for or on behalf of Caledonian MacBrayne, and we expect, and provide support to, all colleagues to uphold the delivery of our environmental objectives and uphold the standards set out in this policy.

Our environmental commitments are built around the following principles:

- **Promote continual improvement and pollution prevention** through setting objectives, monitoring performance, and applying best practise environmental practices.
- **Ensure legal compliance** by adhering to environmental legislation, regulations, and standards, supported by audits and reviews.
- **Minimise environmental impact** across all operations by optimising resource use, reducing waste, and embedding sustainability in procurement.
- **Enhance environmental awareness** through staff training, clear communication of policy and objectives across the organisation. And in addition to engagement with environment partners to monitor and share biodiversity related information across the network.
- **Demonstrate accountability** via regular audits, performance reviews, and transparent reporting to drive ongoing improvement.

Our Environmental Policy underpins the arrangements, actions and monitoring set out in this Environmental Management Plan. It is reviewed regularly to ensure it remains current, effective and consistent with evolving environmental expectations, scientific understanding and regulatory requirements.

By embedding the principles of this policy into everyday decision making, we aim to operate in a way that delivers reliable lifeline services while protecting the environment now and for generations to come.

3. Compliance with environmental legislation

Caledonian MacBrayne is committed to meeting all environmental legislation, regulations and statutory requirements that apply to our operations across the Clyde and Hebrides network. Compliance is central to how we protect the marine and coastal environment and ensure safe, responsible and sustainable ferry services.

Our compliance arrangements cover both shoreside and marine activities and are supported by clear governance, competent advice, and regular performance monitoring. This ensures that legal obligations are understood by operational teams and embedded into day-to-day decision-making.

Environmental legal register and compliance framework

To maintain full oversight of our legal obligations, we operate a structured Environmental Legal Register (ELR).

Environmental Legal Register

The ELR provides a comprehensive and regularly updated record of all environmental legislation, regulations, codes of practice and conventions relevant to our operations. It includes statutory duties for:

– Pollution prevention.

– Waste and resource management.

– Marine protection and biodiversity.

– Air quality and emissions.

– Hazardous substances and chemicals.

– Energy efficiency and climate obligations.

– UK and IMO-based maritime compliance.

The ELR supports operational compliance by summarising the legislation applicable to each part of our business and identifying any associated licences, consents or permits.

Compliance Framework

Our compliance framework ensures that legal requirements are effectively implemented across vessels, ports and supporting functions. It includes:

– Integration of legal obligations into policies, procedures and operational manuals.

– Regular horizon-scanning for legislative changes.

– Access to qualified environmental and maritime expertise.
– Compliance checks and audits built into our Environmental Management System.
– Clear governance and escalation routes for any non-conformances.

This structured framework ensures that compliance is maintained, monitored and continuously strengthened.

Legislative compliance

We maintain a proactive approach to legislative compliance, ensuring that all applicable environmental requirements are reflected in operational practice.

This includes:

– Ensuring all relevant MARPOL, Merchant Shipping and environmental statutory requirements are followed.
– Maintaining current environmental permits, licences and authorisations.
– Ensuring vessel and shoreside documentation is consistent with legal obligations.
– Monitoring compliance through audits, inspections and reporting mechanisms.
– Working closely with SEPA, Marine Scotland, MCA and local authorities.
– Reporting incidents, non-compliance and corrective actions through defined channels.

All staff are expected to understand the environmental duties relevant to their roles and comply with the procedures in place.

Continuous improvement

We take a continuous improvement approach to environmental compliance, ensuring that our systems evolve in line with changes in legislation, best practice and operational learning.

This includes:

– Regular reviews and updates of the Environmental Legal Register.
– Incorporating lessons learned from audits, inspections and incidents.
– Updating procedures and controls to reflect new legal or regulatory requirements.
– Engaging with regulators and industry bodies to remain aligned with best practice.
– Ensuring that staff receive up-to-date training and guidance on compliance requirements.

By continually improving our compliance framework, we ensure that our operations remain lawful, responsible and aligned with the expectations of the communities and stakeholders we serve.

4. Conclusion

This Environmental Management Plan provides the strategic, parent level framework for how Caledonian MacBrayne manages environmental responsibilities across the CHFS3 network. It sets out our commitments to legal compliance, environmental protection, climate action and continuous improvement.

The supporting sub-plans provide the detailed operational measures required to deliver these commitments day to day. Together, the parent EMP and its sub-plans form a complete environmental management system designed to protect the environment, support community wellbeing and ensure that our ferry services remain resilient, safe and sustainable.

We will continue to review and update this plan to reflect evolving legislation, scientific understanding, operational practice and community expectations, ensuring we meet our responsibilities today and into the future.

Section 2
Pollution incident response plan

1. Introduction

Caledonian MacBrayne is committed to preventing pollution and responding effectively to any incident that may impact the marine or coastal environment. Our Pollution Incident Response Plan ensures that clear procedures, trained personnel and appropriate resources are in place to minimise harm, protect sensitive habitats and comply with all statutory and contractual requirements under CHFS3.

This plan applies to all vessels, ports and shoreside operations under our direct or indirect control and forms a core component of our wider Environmental Management Plan.

2. Compliance framework

Our pollution response arrangements are aligned with:

– All applicable marine and environmental legislation.

– MARPOL requirements for oil, sewage, garbage and air emissions.

– The Merchant Shipping (OPRC) Regulations.

– Local port and harbour authority procedures.

– SEPA and Marine Scotland environmental regulations.

– The requirements of our Environmental Legal Register.

Compliance is supported through documented procedures, regular review of legislation, and integration of legal requirements into operational manuals and vessel specific plans.

3. Integrated response approach

Our approach to managing pollution incidents is based on early detection, effective containment and rapid escalation. Key principles include:

– Immediate action by crew or staff to control or contain the source.

– Activation of vessel or port specific emergency response plans.

– Integration with local port, harbour authority and emergency service procedures.

– Clear escalation routes through the operational chain of command.

- Alignment with national and regional marine pollution response frameworks.
- Use of established risk assessments and environmental protection guidance.

This integrated model ensures that all responding teams operate in a coordinated way, reducing potential environmental impact and ensuring an effective recovery.

4. Command and communication structure

A clear command structure supports rapid and accurate decision making during an incident:

On vessels

- The Master has overall responsibility for managing the response on board.
- The Officer of the Watch undertakes initial assessments and activates procedures.
- Crew follow defined emergency roles as set out in vessel operating manuals.

Ports and shoreside

- The Harbour Manager or Senior Shoreside Manager leads the response locally.
- Port teams support containment, communication and passenger management.
- Escalation to the Duty Operations Manager occurs where required.

Corporate oversight

- The Environmental team provides specialist advice.
- The Integrated Operations Control Centre coordinates strategic communication.
- External bodies (e.g. MCA, SEPA, Harbour Authorities) are notified in line with statutory requirements.

This structure ensures clarity, accountability and consistency across all parts of the network.

5. Reporting requirements

All pollution incidents, near misses or suspected releases must be reported immediately through the appropriate channels.

Reporting requirements include:

- Immediate notification to the Master or Harbour Manager.
- Statutory reporting to the Maritime and Coastguard Agency (MCA), SEPA or local authorities where required.
- Documentation in the PURE system for internal investigation and follow-up.
- Timely communication to Transport Scotland.

– Environmental team involvement for analysis, regulatory coordination and corrective actions.

Clear and prompt reporting enables effective containment, compliance with legal requirements and identification of lessons learned.

6. Training, drills and exercises

To ensure readiness, our teams participate in a structured programme of training and practice, including:

– Pollution response exercises on vessels and at ports.

– Tabletop simulations involving operational staff and managers.

– Joint exercises with Harbour Authorities and emergency services.

– Training for crew and operational teams on spill response equipment, procedures and reporting.

– Regular review of learning outcomes to improve future performance.

These activities ensure all staff understand their roles and can respond confidently and effectively during an incident.

7. Equipment and resources

We maintain spill response equipment and resources appropriate to the risks across our network, including:

– Spill kits at ports and onboard vessels.

– Absorbent materials and booms.

– Personal protective equipment.

– Waste containment and disposal materials.

– Access to additional regional response assets via Harbour Authorities or contractors.

Equipment is inspected, maintained and replenished regularly to ensure it is ready for use at all times.

8. Marine life sensitivities

We recognise that the west coast of Scotland hosts sensitive marine species and protected habitats. Pollution response plans take account of:

– Marine Protected Areas, SSSIs and priority habitats.

– Seasonal sensitivities (e.g. breeding, migration).

– Local wildlife guidance, including the Scottish Marine Wildlife Watching Code.

– Biodiversity duties under Scottish legislation.

Where incidents occur near ecologically sensitive areas, we work closely with environmental regulators to minimise impacts and support ecological recovery.

9. Continuous improvement

We are committed to continuous improvement in pollution prevention and response. We regularly:

– Review and update procedures based on lessons learned.

– Analyse incident trends and near miss data.

– Incorporate findings from internal and external audits.

– Engage with regulators, harbour authorities and industry partners.

– Update training and equipment as operational needs evolve.

This ensures that our pollution response arrangements remain effective, compliant and aligned with best practice.

Section 3
Waste management plan

1. Introduction

Caledonian MacBrayne is committed to managing waste responsibly across all aspects of our operations, both on board our vessels and at our ports and shore-based facilities. Effective waste management helps us protect the marine and coastal environment, support the circular economy, and meet the expectations of our customers, communities and regulators.

This Waste Management Plan sets out how we prevent, minimise, segregate and dispose of waste in a safe, compliant and environmentally responsible way. It applies to all activities carried out that are under the direct or indirect control of Caledonian MacBrayne, including staff, contractors and other third parties working on our behalf.

2. Objectives and targets

Our aim is to reduce the environmental impact of waste generated by our operations and to increase resource efficiency across the network. To achieve this, our waste management objectives are to:

– Prevent and reduce waste at source by designing operations, procurement and services to avoid unnecessary materials and single-use items wherever practicable.

– Increase reuse and recycling by improving segregation, infrastructure and awareness on vessels and at ports.

– Minimise disposal to landfill and recover value from waste wherever feasible, including through energy-from-waste and recycling routes.

– Manage all waste safely and compliantly, ensuring appropriate handling, storage, transport and disposal.

– Support circular economy principles by favouring products and services that can be reused, repaired, recycled or recovered.

– Engage customers, staff and contractors in responsible waste behaviour and provide clear information on how to dispose of waste correctly.

These objectives are supported by measurable performance indicators, such as:

– Reducing residual (general) waste per passenger or per crossing over the duration of CHFS3.

- Increasing the proportion of waste diverted from landfill through recycling and recovery.
- Increasing the availability and use of recycling facilities for customers and staff.

3. Regulatory compliance

Our waste management activities are governed by a range of environmental and maritime legislation and regulations. We will:

- Comply with all relevant waste and environmental legislation applying to both shore-based and vessel operations, including requirements for storage, transfer, transport and disposal of waste.
- Adhere to applicable maritime requirements for ship-generated waste, including compliance with MARPOL Annex V and port waste reception facility obligations.
- Comply with duty-of-care requirements for waste producers, ensuring that waste is transferred only to authorised carriers and facilities with appropriate documentation.
- Ensure that special and hazardous wastes (such as oils, chemicals, batteries, waste electrical and electronic equipment (WEEE) and clinical or sanitary waste) are identified, stored, handled and disposed of in line with relevant regulations and good practice.
- Maintain appropriate contracts and licences with waste contractors and port reception facilities to ensure legal and traceable disposal routes.

Regulatory requirements are captured within our Environmental Legal Register and integrated into relevant procedures, vessel operating manuals and port/shore management systems.

4. Responsibilities

Effective waste management is a shared responsibility across the organisation. Key responsibilities include:

- Board and Executive team – provide oversight, set expectations for environmental performance and ensure adequate resources are in place.
- Environmental team – maintain the Environmental Legal Register, develop waste management standards, provide guidance and support, and review performance.
- Operational Managers (Fleet and Ports) – implement waste procedures in their areas, ensure staff are trained and that equipment and facilities are available and maintained.
- Masters and Senior Officers – ensure vessel crews follow waste segregation and disposal procedures, keep appropriate records and liaise with ports on waste landing.

- Harbour and Port Managers – manage shore-based waste facilities, including segregation infrastructure, storage, signage and contractor coordination.
- Supply Chain team – incorporate waste reduction, recyclability and circular economy considerations into purchasing decisions and supplier requirements.
- All Employees and Contractors – follow waste segregation guidance, use facilities correctly, minimise waste where possible and report any waste-related issues or non-compliances.

5. Waste management in operations

Waste management is integrated into our day-to-day operations across vessels and shore facilities.

Key operational measures include:

- Segregation at source – separating recyclable streams (e.g. paper, card, plastics, metals, glass), food waste, hazardous waste and residual waste at the point of generation.
- Clear labelling and signage – providing consistent, easily understood signage on bins and waste areas to support correct disposal by customers and staff.
- Onboard handling – using designated storage areas and containers for different waste types, in line with safety, hygiene and maritime requirements.
- Port reception and transfer – coordinating with port waste reception facilities and contractors to ensure timely, compliant collection and onward treatment of waste.
- Food waste and galley operations – managing food waste separately where required, and encouraging waste reduction through menu planning, stock management and portion control.
- Office and depot activities – applying the same segregation and reduction principles in offices, workshops and depots, including printing, packaging and consumables.

6. Energy reclamation performance

Where feasible and available within local infrastructure, we seek to support energy recovery from residual waste that cannot be reused or recycled.

Our approach includes:

- Working with waste contractors who can provide energy-from-waste routes where recycling is not possible.
- Monitoring the proportion of our residual waste sent to energy recovery facilities, where this information is available from contractors.

- Considering opportunities to increase the share of waste sent to recovery rather than landfill, in line with the waste hierarchy and local infrastructure constraints.
- Reviewing contractor performance and reporting to understand trends in recovery and disposal.

Energy reclamation data will be used, where available, to inform future targets and support continuous improvement in waste hierarchy performance.

7. Soft plastics

Soft plastics, such as wrappers, film and bags, present a particular challenge in remote and island locations where specialist recycling infrastructure may be limited. We will:

- Seek to reduce soft plastic generation at source, including through procurement decisions (e.g. product choices and packaging specifications).
- Work with suppliers to identify opportunities to reduce or eliminate unnecessary soft plastic packaging.
- Where practicable, provide routes for separated soft plastics to be returned to appropriate recycling or recovery streams via contractors or take-back schemes.
- Provide clear guidance to staff and customers on how soft plastics should be disposed of where recycling is not available, to prevent contamination of other recycling streams.

8. Customer recycling

We recognise that customers want to play their part in protecting the environment. To support this, we will:

- continue to provide clearly marked recycling points on board vessels and at ports, wherever practicable, covering common materials such as paper, card, plastics, cans and glass where local facilities allow.
- continue to use consistent signage and messaging to help customers understand how to separate their waste correctly.
- encourage responsible behaviour through onboard announcements, posters and digital channels where appropriate.
- monitor usage of customer recycling facilities and use feedback to improve layout, signage and capacity.

Our aim is to make it as easy as possible for customers to recycle correctly while travelling with us.

9. Contractors

Contractors play a key role in delivering our waste management arrangements, from collection through to final treatment. We will:

– include clear waste and environmental requirements in relevant contracts and service level agreements.

– use competent and appropriately licensed contractors for all waste streams, including hazardous and special waste.

– require contractors to provide evidence of lawful disposal, treatment and recovery routes, including documentation where necessary.

– engage with contractors to identify opportunities for increased recycling, recovery and circular economy solutions.

– monitor contractor performance and address any issues that could impact compliance or environmental performance.

10. Monitoring and reporting

We monitor waste management performance to understand trends, identify opportunities for improvement and demonstrate compliance.

Our monitoring and reporting activities include:

– collecting data on waste volumes and, where available, breakdowns by waste type (e.g. recycling, residual, hazardous).

– reviewing contractor reports and invoices for tonnage and treatment information.

– tracking key indicators such as residual waste, recycling rates and diversion from landfill, subject to data availability.

– recording any waste-related incidents, non-compliances or complaints, and capturing actions taken in response.

– reporting relevant waste and recycling information as part of our wider environmental reporting and, where required, to Transport Scotland.

11. Continuous improvement

We are committed to continuous improvement in waste management across the network. We will:

– Regularly review this Waste Management Plan to reflect operational learning, regulatory changes and improvements in available infrastructure.

- Use monitoring data, incident reports and customer/staff feedback to identify and prioritise improvement actions.
- Work with suppliers, contractors, community partners and regulators to explore new opportunities for waste reduction, reuse, recycling and recovery.
- Support innovation and trials where they can help deliver better outcomes, such as new recycling streams, packaging changes or behaviour change campaigns.
- Ensure staff receive updated guidance and training as procedures and facilities evolve.

Through these measures, we aim to reduce waste, support the circular economy and protect the environment while delivering reliable lifeline ferry services.

Section 4
Sustainable procurement policy

1. Vision and policy statement

Caledonian MacBrayne is committed to using its procurement activity to support sustainable, responsible and ethical operations across the Clyde and Hebrides network. Our vision is to ensure that the goods and services we purchase deliver long term value for customers and communities while reducing environmental impacts and supporting fair employment practices.

We aim to work with suppliers who share our commitment to sustainability, resource efficiency, transparency and high standards of environmental and social performance. This approach aligns with national sustainable procurement duties and supports the broader objectives of Caledonian MacBrayne and Scottish Government policy.

2. Early consideration of economic, environmental and social wellbeing

We integrate sustainability principles at the earliest stage of every procurement process. Before planning or issuing a contract, we consider the wider economic, environmental and social outcomes that procurement decisions may influence.

This includes:

– Reducing waste, emissions and resource use throughout the product or service lifecycle.

– Supporting local supply chains where appropriate and feasible.

– Considering whole life value rather than upfront cost alone.

– Selecting materials and solutions that conserve natural resources and reduce environmental impact.

– Ensuring that specifications reflect circular economy principles, including reuse, repairability and recyclability.

– Considering equality, accessibility and social value in procurement decisions.

By applying these considerations from the outset, we ensure that procurement contributes to improved environmental performance and wider community wellbeing.

3. Community benefits

Caledonian MacBrayne seeks to maximise the social value delivered through its supply chain. Where appropriate, we include community benefit requirements in medium and large procurements to ensure that suppliers contribute positively to the communities our services support.

Potential community benefits include:

– Local employment or training opportunities.

– Support for apprenticeships and upskilling.

– Working with local enterprises and third sector organisations.

– Educational outreach or community engagement initiatives.

– Contributions to local biodiversity or environmental improvement projects.

These benefits help strengthen the resilience and wellbeing of island and coastal communities aligned with our public service role.

4. Fair work practices

We expect all suppliers to demonstrate and uphold fair work practices. This includes:

– Payment of fair wages and commitment to the Real Living Wage where appropriate.

– No inappropriate use of zero hours contracts.

– Workforce engagement and opportunities for development.

– Safe, inclusive and respectful working environments.

– Compliance with Scottish Government Fair Work First principles.

– Ensuring fair treatment of workers within our supply chain is essential to delivering responsible, ethical and sustainable ferry services.

5. Health and safety

Health and safety are fundamental to all procurement decisions. We require suppliers to:

– Demonstrate compliance with relevant health and safety legislation and standards.

– Provide evidence of appropriate policies, training and risk management arrangements.

– Ensure that goods, materials and equipment meet required safety specifications.

– Follow Caledonian MacBrayne's health and safety requirements when working on or near our vessels, ports and facilities.

– Report incidents, hazards and near misses in accordance with agreed procedures.

This ensures that all procured goods and services contribute to a safe environment for customers, contractors and staff.

6. Food procurement

We are committed to sourcing food and catering supplies responsibly and sustainably, reflecting our support for healthy, ethical and low carbon choices. Our approach includes:

- Prioritising Scottish produce where possible to support local suppliers.
- Ensuring compliance with food hygiene and safety requirements.
- Encouraging sustainable production, animal welfare and responsible sourcing practices.
- Reducing food waste through efficient stock management and menu planning.
- Exploring low carbon and plant-based options to support carbon reduction plans.

We will continue working with suppliers to identify opportunities for lower impact, community supporting and ethical food procurement routes.

7. Targets

To measure and strengthen our sustainable procurement performance, we will work towards meeting the following targets:

- Increase the proportion of goods and services procured with clear sustainability criteria.
- Embed circular economy principles into key procurement categories.
- Reduce the volume of single use and nonrecyclable materials procured.
- Increase the number of contracts that include community benefit and Fair Work requirements.
- Improve reporting and transparency on sustainability impacts within the supply chain.
- Increase the proportion of food procured from Scottish suppliers, where feasible.
- Encourage suppliers to adopt low carbon practices and report on their environmental performance.

Progress against these targets will be monitored through our Supply Chain team and reported as part of our wider environmental and sustainability reporting.

Section 5
Green travel plan

1. Introduction

Caledonian MacBrayne is committed to promoting sustainable travel across our network and supporting low carbon, accessible and environmentally responsible transport choices for customers and employees. Our Green Travel Plan outlines how we will reduce transport related emissions, encourage active and public transport, and play our part in delivering Scotland's transition to net zero.

This plan applies to all activities and supports our wider sustainability objectives, including emissions reduction, air quality improvements and enhanced community wellbeing.

2. Policy context and compliance framework

Our Green Travel Plan is shaped by a range of national and regional policies and regulatory requirements, including:

– Scotland's Climate Change (Emissions Reduction Targets) Act.

– National Transport Strategy 2 (NTS2).

– Scotland's Climate Change Plan Update.

– Active Travel Framework.

– Local authority transport plans and island connectivity priorities.

These policies guide our approach and ensure our travel initiatives align with Scotland's wider climate, mobility and decarbonisation commitments.

Compliance is delivered through:

– Integration of green travel objectives into corporate planning.

– Monitoring against environmental and green transport related KPIs.

– Collaboration with Transport Scotland, local authorities and regional transport providers.

– Regular review of travel behaviours, options and operational constraints.

3. Strategic objectives

The strategic objectives of our Green Travel Plan are to:

- Reduce carbon emissions from staff commuting and business travel.
- Promote sustainable transport options, including public transport, active travel, and low-emission vehicles.
- Integrate travel considerations into operational planning and employee engagement initiatives.
- Support Scotland's national targets, including the 20% reduction in car kilometres by 2030.

These objectives guide our operational approach and form the basis for monitoring progress.

4. National Transport Strategy alignment

Our approach is fully aligned with Scotland's National Transport Strategy (NTS2), particularly its four strategic priorities:

- Reduces inequalities – enabling accessible, affordable low carbon travel options.
- Takes climate action – reducing transport emissions and supporting modal shift.
- Helps deliver inclusive economic growth – supporting connectivity across island and coastal communities.
- Improves our health and wellbeing – promoting active travel and reducing air pollution.

By aligning with NTS2, we support a cleaner, healthier and more equitable transport system for the communities we serve.

5. Operational approach

Baseline data

We monitor how staff and customers travel, using available data to understand:

- Employee commuting patterns.
- Use of private vehicles for business travel.
- Uptake of public transport options.
- Availability of active travel routes.
- Customer behaviour and modal preferences.

Where data gaps exist, we work with stakeholders to improve data quality, enabling more precise planning and targeted interventions.

Promotion of public transport

We encourage the use of public transport options that connect with our services by:

– Providing clear information on connecting bus, train and local transport services.

– Supporting integrated travel planning through online and onsite information.

– Exploring opportunities to collaborate with transport partners to improve multimodal journeys.

– Promoting joint ticketing or coordinated timetables where feasible.

This helps reduce private car use and supports seamless low carbon journeys for passengers.

Active travel initiatives

We support active travel by:

– Providing cycle parking and storage at ports where feasible.

– Improving pedestrian access and routes around ports.

– Continue to encourage staff to walk or cycle where safe and practical.

– Supporting local active travel initiatives led by councils or community partners.

– Supporting accessibility for persons with reduced mobility in all travel solutions.

Active travel improves health, reduces emissions and supports more sustainable travel choices.

Prioritise low emission and shared transport

Our approach includes:

– Encouraging staff to use public transport, carsharing or low emission vehicles for business travel.

– Reviewing fleet requirements with a preference for low or zero emission vehicles where practical.

– Providing electric vehicle (EV) charging where infrastructure allows.

– Promoting shared transport options for staff moving between ports, depots and vessels.

– Considering low emission options in procurement of transport related services.

These measures support emissions reduction across operational travel.

Digital alternatives

To reduce unnecessary travel, we promote digital solutions including:

– Video conferencing and hybrid meetings.

– Remote collaboration tools.

– Online training and webinars.

– Virtual inspections or assessments where appropriate.

Reducing business travel lowers emissions and improves efficiency.

6. Continuous improvement

We continuously improve our travel practices by:

– Reviewing baseline data and KPIs regularly.

– Assessing the impact of initiatives and identifying additional opportunities.

– Learning from staff feedback, operational insights and emerging best practice.

– Updating this plan to reflect technological advancements and policy developments.

– Working with regional partners to identify innovations that support sustainable travel.

Continuous improvement ensures our travel approach evolves in line with Scotland's wider transport decarbonisation goals.

7. Stakeholder engagement

We work with a range of stakeholders to support the delivery of our Green Travel Plan, including:

– Transport Scotland.

– Local authorities and Regional Transport Partnerships.

– Bus and rail operators.

– Community organisations.

– Active travel bodies (e.g. Sustrans).

– Staff groups and trade unions.

Through collaboration, we aim to support better transport choices and deliver shared environmental and social outcomes.

8. Communication strategy

Clear and proactive communication is central to promoting sustainable travel. Our communication approach includes:

- Providing up to date travel information on our website, app and at ports.
- Using signage and digital screens to promote active and public travel.
- Sharing updates with staff through internal channels.
- Highlighting successful initiatives and progress against objectives.
- Providing guidance on low carbon travel options for both staff and customers.

An effective communication strategy ensures that sustainable travel choices are visible, accessible and easy to understand.

Section 6
Energy management plan

1. Introduction

Caledonian MacBrayne is committed to improving energy efficiency across our vessels, ports and shore based facilities. Effective energy management reduces emissions, supports operational resilience, lowers environmental impacts and directly contributes to Scotland's transition to net zero.

This Energy Management Plan sets out how we monitor, control and optimise energy use across the network, incorporating both operational and technical measures. It applies to all personnel working under the direct or indirect control of Caledonian MacBrayne.

2. Compliance framework

Our approach to energy management is shaped by a range of regulatory requirements, industry standards and contractual obligations. These include:

– National and Scottish climate legislation.

– Maritime environmental regulations, including MARPOL Annex VI.

– Streamlined Energy and Carbon Reporting (SECR) requirements.

– Any vessel specific energy and emissions compliance obligations.

– CHFS3 requirements for monitoring, reporting and emissions stewardship.

Compliance is embedded through our Environmental Management System, vessel operating manuals and port procedures, ensuring legal obligations are translated into day-to-day operations.

3. Legislative compliance overview

We comply with all applicable environmental and maritime legislation relating to energy use and emissions. This includes:

– Regulatory limits on air emissions from vessels.

– Mandatory monitoring and reporting requirements for fuel consumption and carbon emissions.

- Requirements for energy management in buildings and shore facilities.
- National and local policies governing energy efficiency, air quality and decarbonisation.
- Compliance with the principles of relevant standards such as ISO 50001 principles, where applicable.

Legislative requirements are captured within the Environmental Legal Register and reviewed regularly to ensure operational alignment and proactive planning.

4. Operational energy efficiency measures

We employ a range of operational measures to reduce fuel consumption and improve energy efficiency across the fleet and ports.

Optimising performance during voyages We optimise vessel operations by:

- Adjusting speed and routing where it is safe and practicable.
- Monitoring hull performance and fouling conditions.
- Using real time data to improve fuel efficiency.
- Adopting best practice navigation and voyage planning techniques.

These measures help reduce greenhouse gas emissions while maintaining reliable services.

Machinery configuration

Machinery settings have a significant impact on energy performance. We ensure:

- Engines and auxiliary systems are operated in their most efficient configuration.
- Power generation is matched to operational demand.
- Maintenance schedules support optimal machinery performance.
- Opportunities for engine load balancing or shutdown of non essential systems are utilised, where safe.

Optimised machinery use helps reduce fuel consumption and overall emissions.

Electrical load management

Efficient management of electrical systems reduces unnecessary energy use on vessels and at ports. Our approach includes:

- Managing lighting, HVAC and auxiliary systems efficiently.
- Reviewing electrical loads during different operational phases.
- Using energy saving settings and smart controls where available.

– Ensuring shore based facilities follow energy efficient operating procedures.

These measures support lower energy use and operational cost savings.

5. Technical measures

We are committed to exploring and implementing technical measures that enhance energy efficiency over the long term. These may include:

– Energy efficient propulsion improvements.

– More efficient HVAC, lighting and control systems.

– Low friction hull coatings.

– Utilise shore power (where infrastructure allows).

– Battery hybrid integration or other low carbon technologies (subject to feasibility and vessel suitability).

– Upgrades to port equipment and plant for improved efficiency.

Technical improvements are prioritised based on feasibility, affordability, operational risk and emissions benefits.

6. Monitoring and reporting

We apply structured monitoring and reporting to ensure transparent and accurate management of energy and emissions performance.

Our monitoring includes:

– Recording fuel consumption across the fleet.

– Tracking energy use in shore facilities.

– Monitoring emissions performance and calculating carbon outputs.

– Analysing operational trends and identifying opportunities for improvement.

– Reporting internally and to Transport Scotland.

– Ensuring compliance with SECR and other statutory reporting obligations

Monitoring data supports evidence based decision making and improved operational efficiency.

7. Continuous improvement

We are committed to continuous improvement in energy management and will:

– Review performance trends regularly.

– Identify improvement actions using operational and emissions data.

– Update procedures, training and guidance to reflect best practice.
– Engage with industry partners on emerging technologies and innovations.
– Incorporate lessons learned from audits, incidents and operational feedback.

This approach ensures our energy management aligns with operational, regulatory and environmental expectations.

8. Key limitations

While we are committed to improving energy performance, several external factors may influence what can realistically be achieved. These include:

– Vessel age, design and propulsion systems.
– Operational profiles required to deliver lifeline services.
– Weather, tidal and navigational constraints.
– Availability of shore power or local infrastructure.
– External supply chain capacity, technology maturity and regulatory approvals.
– Financial and feasibility constraints.

Where limitations exist, we remain transparent and continue to pursue all practicable and proportionate improvements.

Section 7
Low carbon plan

1. Introduction

Caledonian MacBrayne is committed to supporting Scotland's transition to a net zero future by reducing carbon emissions across our operations. The Low Carbon Plan outlines the actions we will take to lower emissions from vessels, ports, shore facilities and business activities, while continuing to deliver essential lifeline ferry services.

This plan aligns with national climate legislation and our organisational environmental commitments. It applies to all personnel involved in delivering CHFS services, including staff, contractors and partners acting on our behalf.

2. Strategic objectives

Our strategic objectives provide the framework for reducing carbon emissions across the network:

– Align with Net Zero by 2045: Support Scotland's statutory climate targets.

– Reduce Scope 1, 2, and 3 emissions: Across vessels, terminals, and supply chains.

– Embed carbon reduction in decision-making: Through lifecycle and cost-benefit analysis.

– Enhance reporting and transparency: Via improved data capture and stakeholder engagement emissions overview

These objectives help focus actions that will deliver meaningful and measurable carbon reductions.

3. Carbon reduction opportunities and cost benefit assessment

We continually review and assess opportunities to reduce carbon emissions. These opportunities span operational, technical and behavioural improvements, and are prioritised based on feasibility, potential impact, cost, and operational requirements.

Examples of carbon reduction opportunities

Operational improvements

– Optimising vessel speed profiles and scheduling.

– Improving hull efficiency through maintenance and fouling management.

– Enhancing voyage planning and monitoring systems.

Technical measures

– Evaluating hybrid or battery assisted propulsion for future vessel upgrades.

– Installing more efficient HVAC, lighting and control systems on vessels and in ports.

– Expand full shore power capability where supported by infrastructure owner.

– Improving metering and energy monitoring systems.

Shore facilities improvements

– Upgrading building systems for better insulation and energy efficiency.

– Improving lighting, heating and ventilation controls.

– Increasing the use of renewable or low carbon energy sources where options exist.

Behavioural and cultural changes

– Encouraging low carbon choices by staff (e.g., green travel, energy efficient behaviours).

– Embedding carbon considerations into procurement and project planning.

Cost benefit assessment

Each carbon reduction opportunity is assessed based on:

– Estimated emissions saving.

– Capital and operational cost.

– Infrastructure requirements.

– Vessel or port operational constraints.

– Maintenance and lifecycle implications.

– Regulatory alignment and expected future requirements.

Opportunities that offer the highest carbon benefit relative to cost and operational feasibility are prioritised for implementation.

4. Monitoring and reporting

We take a structured approach to monitoring emissions and reporting progress, ensuring transparency and accountability.

This includes:

– Tracking fuel use across the fleet and calculating associated emissions.

– Monitoring energy consumption in ports and buildings.

- Recording key performance indicators that measure progress toward low carbon objectives.
- Using reporting frameworks such as Streamlined Energy and Carbon Reporting (SECR) where applicable.
- Providing updates to Transport Scotland.
- Analysing trends to identify new opportunities for emissions reduction.

Accurate monitoring supports informed decision making and ensures that carbon reduction remains a central focus across our operations.

5. Continuous improvement

We will continuously improve our approach to carbon management by:

- Reviewing performance and updating the Low Carbon Plan regularly.
- Incorporating lessons from audits, innovation trials and operational feedback.
- Engaging with industry bodies, regulators and technology providers on emerging decarbonisation solutions.
- Updating procedures, guidance and training based on evolving best practice.
- Identifying opportunities to enhance collaboration with suppliers and partners.
- Ensuring that carbon considerations are embedded into major investment decisions and future fleet planning.

This commitment ensures that we remain aligned with Scotland’s climate ambitions and continues to reduce emissions while delivering reliable, essential ferry services.

Section 8
Air Quality Management Plan

1. Introduction

Caledonian MacBrayne is committed to managing and reducing emissions that affect air quality across our vessels, ports and shore based facilities. As part of the parent Environmental Management Plan, the Air Quality Management Plan sets out the framework for how we monitor, control and minimise air emissions associated with delivering lifeline ferry services across the Clyde and Hebrides network.

This plan supports our wider environmental commitments by ensuring compliance with relevant legislation, improving understanding of operational emissions, and identifying opportunities to reduce pollutants that impact the health of customers, communities, employees and the environment. It also provides the structure within which we report emissions, manage performance, and prepare for emerging requirements such as voluntary participation in future emissions trading schemes.

By integrating air quality considerations into decision making, vessel operations, port activities and long-term planning, this plan helps ensure that Caledonian MacBrayne continues to operate safely, responsibly and in line with Scotland's wider climate and air quality ambitions.

2. Objectives

Caledonian MacBrayne is committed to managing and reducing emissions that affect air quality across our vessels, ports and shore-based facilities. The purpose of this Air Quality Management Plan is to:

– Reduce harmful emissions associated with ferry operations.

– Support compliance with all applicable air quality and maritime emission standards.

– Improve environmental outcomes for coastal and island communities.

– Support Scotland's wider climate and air quality targets.

– Promote a culture of continuous improvement and responsible environmental performance.

Air quality considerations form a core part of our environmental responsibilities and guides our operational decision-making.

3. Legal and regulatory framework

Our air quality management approach is shaped by a comprehensive range of environmental and maritime regulations, including:

– MARPOL Annex VI (air pollution from ships).

– UK and Scottish air quality legislation and national standards.

– Emission control requirements for vessels, machinery and boilers.

– Streamlined Energy and Carbon Reporting (SECR) obligations.

– Monitoring, Reporting and Verification (MRV) requirements for vessel emissions.

– Local authority air quality frameworks and regional transport/environment policies.

These requirements are incorporated into our Environmental Legal Register and updated as legislation and standards evolve.

4. Emissions reporting framework

We apply a structured reporting framework to ensure transparency and compliance with national and maritime emissions reporting requirements.

Streamlined Energy and Carbon Reporting (SECR)

We report organisational carbon emissions and energy consumption in line with SECR requirements. This includes data relating to:

– Fuel consumption across the fleet.

– Energy use in shore-based facilities.

– Associated greenhouse gas emissions.

– Energy efficiency measures implemented during the reporting period.

SECR reporting ensures accountability and supports continuous improvement in emissions performance.

Monitoring, Reporting and Verification (MRV)

We comply with applicable MRV requirements for maritime emissions. This includes:

– Collecting accurate fuel and voyage data.

– Calculating carbon dioxide emissions for vessels subject to MRV reporting.

– Maintaining auditable records for verification.

– Ensuring alignment with recognised monitoring plans.

Our approach ensures transparent and compliant emissions reporting aligned with relevant UK and IMO frameworks.

Transition to Voluntary UK ETS

While maritime operations are not yet fully covered by the UK Emissions Trading Scheme (UK ETS), we monitor developments in this area and will prepare for future compliance by:

- Tracking emission profiles across the fleet.
- Reviewing the feasibility of data alignment with UK ETS requirements.
- Identifying technical and operational measures that support future transition.
- Engaging with regulators and industry bodies to understand evolving expectations.

This proactive approach ensures we are ready to respond effectively as policy and market mechanisms evolve.

5. Monitoring and data collection

We monitor air quality performance through:

- Recording vessel fuel consumption and operational profiles.
- Monitoring emissions outputs, including CO_2, NO_x, SO_x and particulate matter, where applicable.
- Tracking shore facility energy use and associated emissions.
- Reviewing operational data to understand the drivers of emissions.
- Conducting audits and inspections where required.
- Working with contractors and suppliers to gather relevant emissions data.

Monitoring enables us to identify areas for improvement and supports evidence-based decision-making.

6. Areas for improvement

We continue to explore opportunities to reduce emissions that affect air quality. Key areas include:

- Improving the energy efficiency of vessels.
- Enhancing operational practices such as optimised routing and engine loading.
- Reducing idling time for vessels and vehicles.
- Exploring low carbon and alternative fuel opportunities.
- Improving port infrastructure to support cleaner operations.
- Enhancing data quality and systems for monitoring air quality impacts.

These improvements are prioritised based on feasibility, operational requirements and potential emissions benefits.

Implementation roadmap

Our roadmap for delivering air quality improvements includes:

– Short-term actions: enhanced monitoring, operational efficiencies, idling reduction.

– Medium-term actions: technical upgrades, improved data systems, infrastructure enhancements.

– Long-term actions: integration of alternative fuels, hybridisation, shore power readiness, fleet modernisation (subject to feasibility and investment decisions).

Progress is reviewed regularly and aligned with emerging industry standards.

Section 9
Ecology Management Plan

1. Introduction

Caledonian MacBrayne operates in some of Scotland's most ecologically important marine and coastal environments. The Ecology Management Plan sets out how we protect biodiversity, minimise ecological disturbance and support the resilience of the habitats and species found across the Clyde and Hebrides network.

This plan applies to all activities, including vessel operations, port activities, maintenance works and relevant shore based functions. It supports our wider Environmental Management Plan and reflects our responsibility to safeguard the natural environment for current and future generations.

2. Environmental Policy

Our Environmental Policy commits us to preventing pollution, protecting biodiversity and continuously improving our environmental performance. In relation to ecology, this means that we will:

– Operate in a way that minimises disturbance to marine and coastal habitats.

– Take steps to avoid, reduce or mitigate impacts on protected species and designated sites.

– Comply with all applicable ecological and nature conservation legislation.

– Integrate ecological considerations into planning, operations and maintenance activities.

– Work with regulators, communities and partners to enhance environmental outcomes.

The Ecology Management Plan provides the practical framework to deliver on these policy commitments.

3. Ecological focus

Our ecological focus reflects the unique character of the West Coast environment and the nature of our operations. Key themes include:

– Protected areas and designations – such as Marine Protected Areas (MPAs), Special Areas of Conservation (SACs), Special Protection Areas (SPAs), Sites of Special

Scientific Interest (SSSIs) and other locally designated sites that overlap with our routes, ports or anchorages.

– Priority habitats – including seagrass beds, kelp forests, intertidal zones, rocky shorelines and sensitive seabed habitats.

– Protected and priority species – such as marine mammals (e.g. dolphins, porpoises, whales, seals), seabirds, migratory fish and other species of conservation concern.

– Operational interfaces – for example, berthing, manoeuvring, anchoring, dredging (where applicable), maintenance activities and onshore developments that may interact with sensitive ecological features.

Our approach is to identify where our activities interact with these ecological receptors and apply proportionate measures to avoid or minimise negative impacts.

4. Risk assessment and impact analysis

Ecological risk assessment and impact analysis are central to our management approach.

We will:

– Identify ecological sensitivities along routes, in harbour areas and at shore facilities, including designated sites and known wildlife hotspots.

– Assess the potential impacts of operations and planned activities (e.g. changes to timetables, new infrastructure, maintenance works) on habitats and species.

– Consider cumulative effects, particularly where multiple activities or operators may contribute to ecological pressures.

– Use proportionate risk assessment tools, drawing on existing environmental data, regulatory guidance and site specific assessments where required.

– Incorporate mitigation into planning and operations, such as route choice, speed management, seasonal timing and exclusion or buffer zones.

Where projects or activities trigger more detailed assessment requirements (for example, under the Habitats Regulations or Environmental Impact Assessment legislation), we will collaborate with the relevant authorities to ensure that ecological risks are properly understood and managed.

5. Legal framework

Our ecological management is guided by a range of international, UK and Scottish laws and policies. Key elements include:

– Nature conservation and biodiversity legislation (e.g. Wildlife and Countryside Act, Nature Conservation (Scotland) Act, Habitats and Birds Directives as implemented in UK law).

- Marine (Scotland) Act and associated Marine Protected Area designations.
- Requirements relating to protected species, disturbance and habitat protection.
- Harbour and marine licensing regimes where relevant to ecological impacts.
- Scottish Marine Wildlife Watching Code and related good practice guidance.

These requirements are incorporated into our Environmental Legal Register and are reviewed periodically to reflect changes in legislation and policy.

6. Management measures

We use a combination of operational and technical measures to manage ecological risk and minimise impacts on marine and coastal environments.

Biofouling / Dry Dock

Biofouling on vessel hulls can contribute to the spread of non-native species and affect vessel efficiency. Our approach includes:

- Using appropriate hull coatings and maintenance regimes to manage biofouling.
- Planning dry dockings and hull cleanings in suitable facilities with appropriate containment and waste management arrangements.
- Avoiding in water cleaning that risks releasing invasive species or harmful residues, unless carried out under controlled, approved conditions.
- Monitoring guidance on nonnative species and implementing best practice to minimise risk.

These actions support both ecological protection and energy efficiency.

Ballast water management

While our domestic operations may not be routinely subject to the same international ballast water obligations as long distance shipping, we recognise the potential ecological implications of ballast water. We will:

- Follow applicable national requirements and good practice for ballast water management.
- Avoid unnecessary ballast operations in environmentally sensitive areas where practicable.
- Maintain awareness of evolving regulatory expectations and best practice for domestic ballast water management.
- Embed ballast considerations into route and operational planning where relevant.

This helps reduce the risk of introducing or spreading non-native marine species.

Route optimisation

Route and speed decisions can influence disturbance to wildlife and sensitive habitats. Our measures include:

- Considering ecological sensitivities when planning or revising routes and operational patterns.
- Applying speed management or advisory measures in known wildlife hotspots where appropriate and safe.
- Minimising unnecessary manoeuvring or anchoring in ecologically sensitive areas.
- Incorporating ecological considerations into risk assessments for new or amended routes.

These actions help reduce disturbance to marine mammals, seabirds and other wildlife.

7. Roles and responsibilities

Effective ecology management relies on clear responsibilities, which are outlined below:

- Board and Executive team – provide strategic oversight, ensure resources and work to support ecological commitments as part of overall environmental governance.
- Environmental team – maintain the ecological aspects of the Environmental Management Plan, provide specialist advice, and liaise with regulators and stakeholders.
- Operational Managers (Fleet and Ports) – ensure ecological measures are implemented in daily operations, including route practices, berthing and maintenance activities.
- Masters and Senior Officers – apply ecological procedures on board, including wildlife awareness, speed management where appropriate and reporting of significant wildlife interactions.
- Harbour and Port Managers – consider ecological sensitivities in local operations, maintenance and development activities.
- All Staff and Contractors – follow ecological guidance, report wildlife sightings and incidents, and support the protection of habitats and species as part of their roles.

8. Monitoring

We monitor ecological interactions to understand risks and support continuous improvement. This includes:

- Recording relevant wildlife sightings and notable interactions reported by crew or shore staff.

- Tracking any incidents involving wildlife (e.g. strandings in operational areas, collision risks, unusual behaviour).
- Reviewing available environmental data and studies for key routes and ports.
- Participating in or supporting local or regional monitoring initiatives where appropriate.
- Using monitoring data to inform risk assessments, training and management measures.

Monitoring helps us better understand our environmental footprint and refine our practices accordingly.

9. Awareness

Raising awareness among staff and customers supports responsible behaviour around sensitive environments. We will:

- Provide ecological and wildlife awareness materials for seagoing and shore based staff, tailored to their roles.
- Promote good practice in line with the Scottish Marine Wildlife Watching Code.
- Include key ecological messages in relevant training, briefings and internal communications.
- Where appropriate, share information with customers about local wildlife and the importance of respecting sensitive habitats.

Awareness helps ensure that ecological considerations are embedded in day-to-day decision making.

10. Emergency preparedness and response

Some incidents—such as pollution events, groundings or extreme weather impacts—can pose risks to ecology and wildlife. Our approach includes:

- Incorporating ecological considerations into emergency and pollution response plans.
- Taking account of protected sites and species when prioritising response actions.
- Liaising with environmental regulators and specialist agencies during incidents that may affect sensitive habitats or wildlife.
- Ensuring that cleanup and recovery activities are planned and undertaken with ecological sensitivities in mind.

This strengthens our ability to protect the environment during and after an emergency.

11. Wildlife rescue procedures

As a ferry operator, we recognise that our staff may occasionally encounter injured, stranded or distressed wildlife in the course of operations. We will:

– Provide guidance to staff on what to do if they encounter wildlife in distress, including who to contact (e.g. SSPCA, British Divers Marine Life Rescue, local wildlife rescue organisations, or relevant authorities).

– Ensure that staff do not handle or intervene directly with wildlife unless specifically trained and authorised to do so.

– Report relevant incidents promptly to the appropriate agencies and cooperate with their instructions.

– Record such incidents where they intersect with our operations, using this information to inform future awareness and planning.

This approach ensures that wildlife in distress is managed by appropriate specialists, while our staff play a supportive and responsible role.

Section 10
Circular Economy Plan

1. Introduction

Caledonian MacBrayne is committed to embedding circular economy principles across our operations to reduce waste, extend the life of materials and equipment, and support Scotland's transition to a more resource efficient economy. This Circular Economy Plan sets out how we apply circular principles in practice, how we comply with relevant legislation, and the steps we are taking to further align with emerging international standards.

2. Compliance framework

Our circular economy approach is supported by a compliance framework that integrates:

– National waste and resource efficiency policy.

– Scottish circular economy legislation and guidance.

– Requirements within the Environmental Legal Register.

– Procurement obligations relating to reuse, recyclability and reduced environmental impact.

This ensures that circular economy commitments are incorporated within operational planning, procurement processes, waste management and asset management activities.

3. Legislative compliance

We operate in compliance with all relevant circular economy and waste legislation, including:

– Waste (Scotland) Regulations.

– Producer responsibility obligations (e.g., packaging, WEEE, batteries).

– Duty of Care regulations for waste producers.

– Requirements for secure handling and destruction of data bearing waste items.

– Environmental Protection Act requirements for storage, segregation and transfer of materials.

Legislative requirements are captured within the Environmental Legal Register and reviewed regularly to ensure ongoing compliance and operational alignment.

4. Current implementation of circular principles

We already apply circular economy principles across several areas of the business, focusing on reuse, repair, recovery and responsible disposal.

Repair, refurbishment, reuse and redeployment

We maximise the value of assets and equipment by:

- Prioritising repair over replacement where feasible.
- Refurbishing equipment or components to extend their operational life.
- Redeploying surplus items within the organisation to reduce new procurement.
- Using procurement criteria that favour durable, repairable goods.
- Working with suppliers to support takeback, refurbishment or remanufacturing options.

These measures reduce waste, optimise lifecycle value and lower carbon impacts.

Responsible recycling

For materials that cannot be reused or repaired, we ensure responsible and compliant recycling through:

- Segregation of recyclable materials at ports, offices and onboard vessels.
- Recycling of metals, electrical equipment, batteries, oils and other recoverable materials.
- Use of licensed waste contractors who provide verified recycling and recovery routes.
- Monitoring recycling performance and identifying opportunities to increase recycling rates.
- Encouraging customers and staff to recycle correctly using clear, consistent signage.

This supports Scotland's wider circular economy goals and reduces disposal to landfill.

Data security compliance

Many electronic and digital assets contain personal or operational data. We ensure compliant handling by:

- Following UK GDPR and Data Protection Act requirements.
- Ensuring all data bearing devices are securely wiped or destroyed before disposal or reuse.
- Using approved IT asset disposal contractors who meet data security standards.

– Maintaining traceable records of data secure disposal processes.

These measures protect personal and operational data while supporting responsible recycling and recovery.

5. Steps to align with ISO 59004 principles

ISO 59004 provides guidance on circular economy terminology, principles and frameworks. To align with this emerging standard, we will:

– Review current circular practices and identify gaps against ISO 59004 guidance.

– Strengthen lifecycle thinking in procurement, asset management and project planning.

– Improve data collection on material flows, waste generation and product lifecycle impacts.

– Collaborate with suppliers to enhance circular design and end of life options.

– Integrate circular economy considerations into staff guidance, training and processes.

– Incorporate ISO 59004 alignment into future sustainability reporting.

This ensures our approach evolves in line with internationally recognised best practice.

6. Compliance assurance

To ensure we meet our circular economy commitments, we:

– Conduct regular audits of waste, recycling and asset management processes.

– Review contractor compliance for recycling, data security and resource recovery.

– Complete internal checks on the observance of reuse and repair pathways.

– Monitor waste streams to identify diversion opportunities.

– Report through the Environmental Management Plan.

Assurance ensures circular practices are robust, verifiable and effectively implemented.

7. Implementation roadmap

We will continue to embed circular economy principles through a phased roadmap:

Short term (1–2 years)

– Improve internal reuse and repair processes.

– Strengthen recycling infrastructure and data collection.

– Expand staff awareness and guidance on circular practices.

Medium term (3–5 years)

– Enhance supplier engagement on circular design and takeback schemes.

– Embed lifecycle and circular criteria in procurement categories.

– Increase recovery of materials through improved segregation and contractor performance.

Long term (5+ years)

– Align more fully with ISO 59004 circular economy frameworks.

– Support low carbon and circular innovations in the maritime sector.

– Integrate circular economy metrics into corporate sustainability reporting.

This roadmap ensures we continually progress toward a more circular and resource efficient operational model.

Section 11
Weather Resilience and Climate Adaptation Plan

1. Introduction

Caledonian MacBrayne operates in some of Scotland's most exposed marine environments, where changing weather patterns, increasing storm frequency and climate related impacts can affect service reliability, infrastructure and safety. The purpose of this Weather Resilience and Climate Adaptation Plan is to ensure that our operations remain safe, resilient and responsive in the face of evolving climate risks.

This plan outlines how we assess weather related risks, implement adaptation measures, and maintain service continuity for the communities that depend on our services.

2. Objectives

Our objectives are to:

– Strengthen the resilience of vessels, ports and shore based operations to severe weather and climate impacts

– Identify and reduce risks associated with extreme weather, sea level rise and long term climate change.

– Ensure operational decisions take account of accurate forecasting, local knowledge and real time data.

– Support safe decision making for passengers, crews and harbour teams.

– Align with national climate adaptation policies and local authority resilience frameworks.

– Continually improve emergency preparedness and service recovery capability.

These objectives ensure that weather resilience remains central to our operational planning and environmental responsibilities.

3. Risk assessment

We carry out structured risk assessments to understand and manage weather related vulnerabilities across the network. This includes:

– Assessing exposure to severe winds, swell, fog, tidal surges and extreme rainfall.

- Reviewing route specific risks such as narrow channels, open sea passages and exposed berthing environments.
- Identifying climate driven risks such as increased storm frequency, coastal erosion and rising sea levels.
- Evaluating vulnerabilities in critical infrastructure including slips, linkspans, ports and piers.
- Considering interdependencies such as power supply, transport links and port access.
- Using historical performance data to identify routes or ports most affected by weather disruption.

The results inform operational planning, investment decisions and emergency preparedness across the fleet and ports.

4. Adaptation strategies

We implement a range of adaptation measures to mitigate weather related risks and improve resilience:

- **Operational resilience**: enhanced forecasting, dynamic timetabling and proactive service adjustments when required.
- **Infrastructure resilience**: identifying required upgrades to piers, linkspans, fendering and other assets to withstand harsher conditions.
- **Fleet adaptation**: ensuring vessel maintenance, design considerations and equipment selection support improved performance in severe conditions.
- **Environmental adaptation**: considering nature based solutions and coastal protection measures, where relevant.
- **Business continuity**: ensuring contingency plans and alternative transport arrangements are available during severe disruption.
- **Climate resilient planning**: incorporating projected climate impacts into long term planning and procurement decisions

These strategies help maintain safe, reliable services in a changing climate.

5. Roadmap

Our adaptation roadmap provides a phased approach to strengthening resilience across the network.

Short term (0–2 years)

- Strengthen weather monitoring tools and integration with operational decision making.

- Review route specific operating envelopes and update risk registers.
- Enhance staff training on severe weather readiness and incident response.
- Implement immediate operational improvements such as improved communication during disruption.

Medium term (3–5 years)

- Deliver targeted infrastructure improvements to piers, ports and access routes through engagement with infrastructure owners.
- Improve real time data collection on environmental conditions.
- Support enhancements to fleet systems that improve resilience (e.g., improved fendering, more robust mooring systems).
- Strengthen partnership working with local authorities and resilience bodies.

Long Term (5+ years)

- Embed climate adaptation into fleet renewal and major infrastructure planning.
- Align long term decisions with national climate modelling and coastal projections.
- Support wider regional climate adaptation initiatives in island and coastal communities.
- Ensure resilience measures remain fit for purpose through periodic review.

6. Compliance and review

Our weather resilience and climate adaptation activities align with:

- Scotland's Climate Change Adaptation Programme.
- Local authority and regional resilience frameworks.
- The Civil Contingencies Act (in relation to emergency planning).

We regularly review this plan to ensure it reflects:

- Emerging climate science.
- Lessons from weather related incidents.
- Updated risk assessments.
- Changes in regulatory requirements.
- Technological and infrastructure developments.

The plan is updated as part of our Environmental Management System to ensure our operations remain resilient, safe and aligned with national climate adaptation goals.

Section 12
Environmental Reporting and Performance Plan

1. Introduction

Caledonian MacBrayne is committed to transparent, accurate and credible environmental reporting across all areas. Environmental reporting enables us to demonstrate regulatory compliance, track performance, identify improvements and provide assurance to Transport Scotland, regulators, customers and communities.

This section outlines our environmental reporting framework, the legislation and contractual requirements that guide our reporting, and the processes we use to verify, review and continuously improve environmental performance.

2. Compliance framework

Our environmental reporting is governed by a combination of:

– National statutory reporting obligations, including energy and emissions reporting.

– Maritime and environmental regulatory requirements, including those linked to vessel emissions.

– CHFS3 reporting obligations.

– Internal governance processes for monitoring, verification and review.

– Data quality requirements embedded within our Environmental Management System.

These frameworks ensure that the environmental information we provide is complete, accurate and aligned with industry best practice.

3. Legislative and contractual reporting

We meet a range of mandatory reporting requirements, including:

– Streamlined Energy and Carbon Reporting (SECR) for applicable emissions and energy use.

– Reporting obligations stemming from MARPOL Annex VI and other maritime regulations.

– Reporting on waste, recycling, pollution events and other environmental indicators.

- CHFS3 reporting requirements, including:
  - Monthly and quarterly environmental performance submissions.
  - Incident and pollution reporting.
  - Progress updates on environmental action plans.
  - Annual environmental performance summaries.

Reporting is conducted through structured internal systems, with data reviewed and validated by the Environmental team prior to submission.

4. Developing voluntary Emissions Trading Scheme reporting

Although the UK Emissions Trading Scheme (UK ETS) does not currently mandate maritime participation, we are proactively preparing for future requirements by:

- Assessing emissions data quality against UK ETS readiness criteria.
- Reviewing internal processes for data verification and traceability.
- Developing internal methodologies aligned with emerging voluntary maritime ETS guidance.
- Monitoring policy developments and engaging with regulators and industry bodies.
- Identifying operational measures that may support future compliance.

This proactive preparation ensures we are well placed to meet future ETS reporting or compliance requirements should they apply to the ferry sector.

5. Performance review process

We conduct regular reviews of our environmental performance to ensure compliance, support continuous improvement and provide assurance across the organisation.

Our performance review process includes:

- Monthly environmental performance reporting for internal review and Transport Scotland review.
- Trend analysis of key environmental indicators such as fuel use, emissions, waste, pollution incidents and recycling performance.
- Quarterly management reviews with directorates to assess progress and identify improvement actions.
- Annual assessment of overall environmental performance and alignment with strategic objectives.
- Audit and assurance checks to confirm accuracy, completeness and regulatory alignment.

Performance review outcomes inform updates to environmental plans, operational procedures and future investment priorities.

6. Continuous improvement actions

Continuous improvement is embedded in our approach to environmental management. We will:

- Use performance data to identify opportunities for efficiency and emissions reduction.
- Implement corrective and preventive actions following audits, incidents or non-conformances.
- Review targets, KPIs and action plans annually to ensure they remain relevant and achievable.
- Strengthen data systems and reporting processes as operational needs evolve.
- Share best practice and lessons learned across ports, vessels and support teams.
- Engage with partners, regulators and the wider maritime sector to support innovation and learning.

Through ongoing improvement, we ensure that our environmental reporting remains robust, credible and reflective of our commitment to environmental stewardship.

Section 13
Waste Reduction Plan

1. Introduction

Caledonian MacBrayne is committed to reducing waste across all aspects of our operations and supporting Scotland's transition to a circular, resource efficient economy. This Waste Reduction Plan outlines the actions we are taking to minimise waste generation, improve recycling performance, and manage materials responsibly throughout their lifecycle.

The plan applies to all staff, contractors and activities and complements the Waste Management Plan and Circular Economy Report within the wider Environmental Management Plan.

2. Waste targets

To support continuous improvement, we have established waste reduction targets that reflect operational realities across our remote and island network. These targets include:

– Reducing total residual (general) waste generated across vessels and ports.

– Increasing recycling rates, subject to local infrastructure and contractor capability.

– Minimising single use items, especially soft plastics and nonrecyclable materials.

– Maximising the reuse or refurbishment of operational equipment where possible.

– Ensuring 100% compliance with Duty of Care, segregation and waste handling requirements.

Targets will be reviewed annually to reflect performance data, contractor changes and local waste infrastructure availability.

3. Waste performance

Waste performance is monitored across the network to understand trends and to identify improvement opportunities. Performance indicators include:

– Volume of residual waste produced.

– Volume of recyclable materials collected (e.g., paper/card, plastics, cans, glass).

– Proportion of waste diverted from landfill.

- Waste generation per vessel, per port or per passenger.
- Quality of waste segregation (e.g., contamination levels).
- Contractor reporting on recycling and waste treatment methods.

Performance may vary between locations due to differences in local authority facilities, vessel operations, community infrastructure and port capabilities.

4. Types of waste

Waste produced across the network falls broadly into two categories: customer waste and operational waste.

Customer waste

Customer waste is generated through onboard catering, travel consumables and passenger activities. Key characteristics include:

- High volumes of mixed recyclables (plastic bottles, cans, paper/card).
- Variable levels of contamination depending on customer behaviour.
- Limited customer access to recycling on some routes due to physical constraints.
- Packaging waste from onboard retail and catering operations.

Measures to improve customer waste management include:

- Clear customer facing recycling points on vessels and at terminals.
- Consistent signage and messaging to encourage correct disposal.
- Increasing recyclable packaging in catering and retail operations.
- Monitoring contamination levels and adjusting layouts or signage where needed.

Operational waste

Operational waste includes the materials generated through vessel maintenance, port operations and administrative functions. This may include:

- Galley and food waste.
- Cleaning materials and consumables.
- Oils, filters and absorbents.
- WEEE, batteries and lighting.
- Spare parts, packaging and engineering materials.
- Office waste (paper, toner, IT equipment).

Operational waste streams are managed in accordance with legal requirements and best practice, with hazardous or specialist wastes transferred to authorised treatment facilities.

5. Challenges

Waste management across the Clyde and Hebrides region faces several unique challenges linked to geography, infrastructure and service requirements.

Contractual limitations

Some aspects of waste and recycling performance are influenced by factors outside our direct control, such as:

– Availability of recycling services at third party ports.

– Requirements within port leases or harbour authority arrangements.

– Infrastructure constraints at older ports.

– Service obligations that require flexibility in waste handling.

Where contractual arrangements limit waste reduction, we work with partners to identify achievable alternatives.

Government decisions

Changes in national or local waste policy can directly impact available recycling or treatment options. These may include:

– National rollout (or postponement) of extended producer responsibility schemes.

– Changes to local authority waste contracts or accepted materials.

– Delays or modifications to Scotland wide schemes such as the Deposit Return Scheme.

– Policy shifts that affect energy from waste capacity or landfill availability

We will continue to monitor policy developments and adapt plans accordingly.

Specific port waste issues

Local waste infrastructure across islands and remote mainland communities is highly variable. Challenges include:

– Limited recycling capacity at smaller island ports.

– Seasonal fluctuations in waste volumes.

– Restricted space for segregation, especially on older vessels and compact terminals.

– Variability in contractor availability and treatment routes.

– Differences in accepted materials or collection schedules across local authorities.

Where constraints exist, we take a pragmatic approach, focusing on achievable improvements while advocating for improved regional waste solutions.