Marine Management Organisation Marine Licence

1 Introduction

This is a licence granted by the Marine Management Organisation on behalf of the Secretary of State to authorise the licence holder to carry on activities for which a licence is required under Part 4 of the Marine and Coastal Access Act 2009.

1.1 Licence number

The licence number for this licence is L/2017/00012/11

1.2 Licence holder

The licence holder is the person or organisation set out below:

Name / company name	Able UK Ltd
Company registration number (if applicable)	02386356
Address	Able House, Billingham Reach Industrial Estate, Haverton Hill Road, Billingham, TS23 1PX.
Contact within company	Richard Cram
Position within company (if applicable). State if company officer or director	Engineering Director

1.3 Licence date

Version	11
Licence start date	09 September 2024
Licence end date	01 March 2026
Date of original issue	02 March 2017
Date of variation issue	09 September 2024

1.4 Licence validity

This version of this licence is valid from the licence start date to the licence end date.

This version of this licence supersedes any earlier version of this licence. Any activity commenced under a previous version of this licence and which is also a licensed activity authorised by section 4 of this version of this licence may continue in accordance with the licence conditions in section 5 of this version of this licence.

Signature Not Verified
Digitally signed by MARINE MANAGEMENT ORGANISATION
Date: 2024.09.09 12:30:00 BST
Reason: On behalf of the Secretary of State
Location:

Natalie Morton
+44 (0)2082 258 786
natalie.morton@marinemanagement.org.uk

2 General

2.1 Interpretation

In this licence, terms are as defined in section 115 of the Marine and Coastal Access Act 2009 and the Interpretation Act 1978 unless otherwise stated.

- "licensed activity" means any activity set out in section 4 of this licence.
- "licence holder" means the person(s) or organisation(s) named in section 1 above to whom this licence is granted.
- "MMO" means the Marine Management Organisation.
- "mean high water springs" means the average of high water heights occurring at the time of spring tides.
- "sea bed" or "seabed" means the ground under the sea.
- "the 2009 Act" means the Marine and Coastal Access Act 2009.
- All times shall be taken to be the time on any given day.
- All geographical co-ordinates contained within this licence are in WGS84 format (latitude and longitude degrees and minutes to three decimal places) unless stated otherwise.

2.2 Contacts

Except where otherwise indicated, the main point of contact with the MMO and the address for email and postal returns and correspondence shall be:

Marine Management Organisation
Lancaster House
Hampshire Court
Newcastle upon Tyne
NE4 7YH
Tel:0300 123 1032
Email:marine.consents@marinemanagement.org.uk

Any references to any local MMO officer shall be the relevant officer in the area(s) located at:

Marine Management Organisation
Neville House
Central Riverside
Bell Street
North Shields
NE30 1LJ
Tel: 0191 257 4520

Email: northshields@marinemanagement.org.uk

3 Project overview

3.1 Project title

Able Seaton Port berths, Holding Basin and Channel

3.2 Project description

Dredging of Able Seaton Port by undertaking a capital dredge to deepen the approach channel and undertaking maintenance dredging to retain access thereafter. Disposal of the material at sea. Placement of erosion matting at the north east side of Quay 11.

3.3 Related marine licences

MLA/2023/00142 - Deposit of inert material into Quay 10 Berthing Pocket.

4 Licensed activities

This section sets out the licensed activities. The licensed activities are authorised to be carried on only in accordance with the activity details below and with the licence conditions as set out in section 5 of this licence.

Please note that where licensed quantities are displayed with reference to their constituent materials, the relative quantities given for the constituent materials are indicative only.

Site 1 - Able Seaton Port Holding basin and Channel			
Site location		Hartlepool, see licence schedule 3.	
Activity 1.1 - Deepening of Seaton Channel, Seaton Channel Holding Basin and Quays 10 and 11			
Activity type		Navigational dredging (capital)	
Activity location		Hartlepool, in accordance with coordinates in licence schedule 3.	
Description		Capital dredging for Seaton Channel, Seaton Holding Basin and Quay 10 and 11. See licence schedule 6 for the maximum depths to be dredged for each of the sites.	
Quantities			
Start date	End date	Material	Quantity (m3)
01/1/2017	01/3/2026	Clay (<31.25um)	721250
01/1/2017	01/3/2026	Silt (31.25-62.5um)	150000
Methodology		Dredging will be undertaken using a combination of trailing suction hopper dredger and backhoe dredging. After this has finished, the dredge area may be levelled using bed levelling vessels. An over dredge allowance of 0.5 m is also allowed for each dredging activity.	
Programme of works		This will be dependent on the need to dredge to receive the larger vessels, tides and when the dredgers are available.	
Activity 1.2 - Maintenance dredging of Seaton Channel, Holding Basin and Quays 10 and 11			
Activity type		Navigational dredging (maintenance)	
Activity location		Hartlepool, in accordance with coordinates in licence schedule 3.	
Description		Maintenance Dredging for Seaton Channel, Seaton Channel Holding Basin and Quays 10 and 11. See licence	

	schedule 6 for the maximum depths to be dredged for each of the sites.

Quantities			
Start date	End date	Material	Quantity (m3)
01/1/2017	01/3/2026	Clay (<31.25um)	10000
01/1/2017	01/3/2026	Silt (31.25-62.5um)	425860

Methodology	The maintenance dredging will be undertaken using a trailer suction hopper dredger followed by Plough dredger to level the sea bed. Silt that is at the edge of the quay walls, which the trailer suction hopper dredger cannot reach, will be removed by a grab on a shore side crane. An over dredge allowance of 0.5 m is also allowed for each dredging activity.
Programme of works	To be undertaken on an annual basis as or if required
Activity 1.3 - Placement of erosion matting	
Activity type	Maintenance of existing works
Activity location	Hartlepool, at the north east side of Quay 11, within the coordinates in licence schedule 3
Description	Erosion matting will, if required, be placed at the north east side of Quay 11. The erosion matting will, when each interlocking mat is put in place, have a total area of 999.72 square metres, with a length of 67.2 metres from the quay, and a width of 17.12 metres (quay end) (18 metres on the slope) and 11.41 metres (river side) and will be made from machine compressed cellular concrete blocks, with the design allowing for gaps in between the cellular blocks.
Methodology	The erosion matting will only be put in place if required. If required, the mats will be prefabricated offsite and moved into position using a crane located on the quay. The crane will lift the mats into position, placing them on the north east side of Quay 11, and once in place they will be interlocked together. Once in position the mats will remain in place.
Programme of works	The placement of matting, if required, will be completed before the end date of this marine licence. The matting is expected to take between one and two days to put in place, but may take up to one week to put in place from start to finish, allowing for contingency.

Site 2 - TERRC Basin, Quays 7, 8 & 9			
Site location		TERRC Basin and Seaton Port Quays 7, 8 & 9, in accordance with coordinates in licence schedule 4.	
Activity 2.1 - TERRC Basin			
Activity type		Navigational dredging (maintenance)	
Activity location		TERRC Basin, within coordinates in licence schedule 4 and drawing in licence schedule 6.	
Description		Maintenance dredge is required to remove the build up of silt. The maintenance dredge will involve the removal of an initial 60,000 m3 of silt material to -6.65 m CD. Following this there will be an annual dredge volume of 9,750 m3 to maintain this level.	
Quantities			
Start date	End date	Material	Quantity (m3)
09/11/2018	01/3/2026	Silt (31.25-62.5um)	128250
Methodology		The maintenance dredging of the TERRC Basin may be carried out by a variety of dredging plant. The choice of plant will be governed by the location and depth of material to be removed year on year. The choice of dredging plant will also be affected by the ongoing Port operations in the basin, as some plant may not prove to be suitable at certain times due to local operational limitations/restrictions. It is anticipated that Hydraulic, Mechanical or Hydrodynamic methods will be suitable for the maintenance operations of the TERRC Basin. Where Hydraulic and Mechanical methods are used the material will be loaded into hoppers, of some description, and the material will be deposited at the offshore disposal site - Tees Bay A (TY160). An over dredge allowance of 0.5 m is allowed for each dredging activity. Where hydrodynamic methods are used the material will be displaced from the TERRC Basin into the deeper water in the Holding Basin, where it will be removed by Hydraulic methods at a later date and deposited at the offshore disposal site - Tees Bay A (TY160).	
Programme of works		The frequency of the removal of the relocated material will depend on the rate of accumulation in the Holding Basin and the operational depth requirements of the Holding Basin at the time.	

Activity 2.2 - Grounding bed			
Activity type		Navigational dredging (maintenance)	
Activity location		Grounding bed (within the TERRC Basin) within coordinates in licence schedule 4 and drawing in licence schedule 6.	
Description		Maintenance dredge is required to remove the build up of silt over the grounding bed. The maintenance dredge will involve the removal of an initial 15,000 m3 of silt material to -6.07 m CD. Following this there will be an annual dredge volume of 2,400 m3 to maintain this level.	
Quantities			
Start date	End date	Material	Quantity (m3)
09/11/2018	01/3/2026	Silt (31.25-62.5um)	31800
Methodology		Material may be removed by mechanical methods with the material either being loaded into hopper barges for disposal at the offshore disposal site, or relocated underwater into deeper water created around the grounding bed, but within the TERRC Basin, to receive material removed from above the grounding bed, such as by ploughing. The Grounding Bed could also be dredged by hydrodynamic methods, either in part or in its entirety. The displaced material will be directed to flow out of the TERRC Basin into the Holding Basin where it will be removed by Hydraulic methods at a later date and deposited at the offshore disposal site - Tees Bay A (TY160). The dredging of the Grounding bed could also be carried out by Hydraulic methods with the material being pumped to hopper barges for disposal at the offshore disposal site - Tees Bay A (TY160). An over dredge allowance of 0.5 m is also allowed for each dredging activity.	
Programme of works		The frequency of the removal of the relocated material will depend on the rate of accumulation in the Holding Basin and the operational depth requirements of the Holding Basin at the time.	
Activity 2.3 - Deepening of Seaton Port Quays 7, 8 and 9			
Activity type		Navigational dredging (capital)	

<table>
<tr><td colspan="2">Activity location</td><td colspan="2">Quays 7, 8 and 9 (within the TERRC Basin) within coordinates in licence schedule 4 and drawing in licence schedule 6.</td></tr>
<tr><td colspan="2">Description</td><td colspan="2">Capital dredging is required to deepen the Quays.</td></tr>
<tr><td colspan="4">Quantities</td></tr>
<tr><td>Start date</td><td>End date</td><td>Material</td><td>Quantity (m3)</td></tr>
<tr><td>09/11/2018</td><td>01/3/2026</td><td>Clay (<31.25um)</td><td>75000</td></tr>
<tr><td colspan="2">Methodology</td><td colspan="2">Mechanical dredging methods are expected to be required for the removal of the bulk of the material. However, it is possible that the dredging operation may also be supported by Hydraulic dredging methods. In all cases the material will be loaded into hoppers and transported to the offshore disposal site - Tees Bay A (TY160).

An over dredge allowance of 0.5 m is also allowed for each dredging activity.</td></tr>
<tr><td colspan="2">Programme of works</td><td colspan="2">The rate of dredging and disposal will be dependent on the size of the dredging plant employed to carry out the deepening.</td></tr>
<tr><td colspan="4">Activity 2.4 - Maintenance dredging of Seaton Port Quays 7, 8 and 9</td></tr>
<tr><td colspan="2">Activity type</td><td colspan="2">Navigational dredging (maintenance)</td></tr>
<tr><td colspan="2">Activity location</td><td colspan="2">Quays 7, 8 and 9 (within the TERRC Basin) within coordinates in licence schedule 4 and drawing in licence schedule 6.</td></tr>
<tr><td colspan="2">Description</td><td colspan="2">Maintenance dredging to remove silts from the Quays. An annual volume of 3,750 m3 will be dredged to maintain the depths shown on the drawing in licence schedule 6.</td></tr>
<tr><td colspan="4">Quantities</td></tr>
<tr><td>Start date</td><td>End date</td><td>Material</td><td>Quantity (m3)</td></tr>
<tr><td>02/3/2019</td><td>01/3/2026</td><td>Silt (31.25-62.5um)</td><td>26250</td></tr>
<tr><td colspan="2">Methodology</td><td colspan="2">It is anticipated that Hydraulic, Mechanical or Hydrodynamic methods will be suitable for the maintenance operations of Quays 7, 8 and 9. Where Hydraulic and Mechanical methods are used the material will be loaded into hoppers, of some description, and the material will be deposited at the offshore disposal site - Tees Bay A (TY160).

An over dredge allowance of 0.5 m is allowed for each dredging activity.</td></tr>
</table>

Programme of works	The rate of dredging and disposal will be dependent on the size of the dredging plant employed to carry out the deepening.

Site 3 - TEES BAY C					
Site location	Tees bay C (TY150) - see licence schedule 2.				
Activity 3.1 - Disposal of Clay to TEES BAY C					
Activity type	Disposal of dredged material				
Activity location	In accordance with coordinates in licence schedule 2.				
Description	Disposal of dredged material to Tees Bay C. The stiff clay removed by dredging will be taken to the designated disposal site Tees Bay C and deposited. 1,476,750 wet tonnes (wt) of clay will be sourced from Seaton Channel, Seaton Channel Holding Basin and Quays 10 and 11 and 165,000wt of clay will be sourced from Seaton Port Quays 7, 8 and 9.				
Quantities					
Start date	End date	Material	Amount to be deposited (dry tonnes)	Amount to be deposited (wet tonnes)	Source
01/1/2017	01/3/2026	Clay (<31.25um)	1174687.0	1476750.0	Able Seaton Port Holding basin and Channel
01/1/2017	01/3/2026	Clay (<31.25um)	131250	165000	TERRC Basin, Quays 7, 8 & 9
Methodology	Dredging will be undertaking using a combination of trailing suction hopper dredger and backhoe dredger. In the case of backhoe dredging, dredged material will be transported to the disposal site in split hopper barges.				
Programme of works	The capital dredging will take place on an as and when basis in order to create the depths necessary for the larger vessels to access Able Seaton Port and dock.				

Site 4 - TEES BAY A	
Site location	Tees Bay A (TY160) see licence schedule 1.

Activity 4.1 - Disposal of Silts and soft material to TEES BAY A					
Activity type		Disposal of dredged material			
Activity location		In accordance with the coordinates in licence schedule 1.			
Description		Disposal of dredged material to Tees Bay A. The silts and soft clays removed by dredging will be taken to the designated disposal site and deposited. 748,618wt of silt and 132,000wt of clay will be sourced from Seaton Channel, Seaton Channel Holding Basin and Quays 10 and 11, and 242,190wt will be sourced from TERRC Basin, Quays 7, 8 & 9.			
Quantities					
Start date	End date	Material	Amount to be deposited (dry tonnes)	Amount to be deposited (wet tonnes)	Source
01/1/2017	01/3/2026	Silt (31.25-62.5um)	287930	748618	Able Seaton Port Holding basin and Channel
09/11/2018	01/3/2026	Clay (<31.25um)	105000	132000	Able Seaton Port Holding basin and Channel
09/11/2018	01/3/2026	Silt (31.25-62.5um)	93150	242190	TERRC Basin, Quays 7, 8 & 9
Methodology		Dredging will be undertaken using a combination of trailing suction hopper dredged and backhoe dredger. In the case of backhoe dredging, dredge material will be transported to the disposal site in split hopper barges. Final levelling of the sea bed will be undertaken using bed levelling vessels. Where material is at the edge of the quay walls and cannot be reached by marine dredging plant, it will be removed by grab by an on shore side crane. Dredged material removed by an on shore side crane will not be disposed of at sea.			

Programme of works	The maintenance dredging, and associated disposal, will take place on an 'as and when' basis in order to maintain the depths reached by the capital dredging.

5 Licence conditions

5.1 General conditions

5.1.1 Notification of commencement

The licence holder must notify the MMO prior to the commencement of the first instance of any licensed activity. This notice must be received by the MMO no less than five working days before the commencement of that licensed activity.

5.1.2 Licence conditions binding other parties

Where provisions under section 71(5) of the 2009 Act apply, all conditions attached to this licence apply to any person who for the time being owns, occupies or enjoys any use of the licensed activities for which this licence has been granted.

5.1.3 Agents / contractors / sub-contractors

The licence holder must notify the MMO in writing of any agents, contractors or subcontractors that will carry on any licensed activity listed in section 4 of this licence on behalf of the licence holder. Such notification must be received by the MMO no less than 24 hours before the commencement of the licensed activity.

The licence holder must ensure that a copy of this licence and any subsequent revisions or amendments has been provided to, read and understood by any agents, contractors or sub-contractors that will carry on any licensed activity listed in section 4 of this licence on behalf of the licence holder.

5.1.4 Vessels

The licence holder must notify the MMO in writing of any vessel being used to carry on any licensed activity listed in section 4 of this licence on behalf of the licence holder. Such notification must be received by the MMO no less than 24 hours before the commencement of the licensed activity. Notification must include the master's name, vessel type, vessel IMO number and vessel owner or operating company.

The licence holder must ensure that a copy of this licence and any subsequent revisions or amendments has been read and understood by the masters of any vessel being used to carry on any licensed activity listed in section 4 of this licence, and that a copy of this licence is held on board any such vessel.

5.1.5 Changes to this licence

Should the licence holder become aware that any of the information on which the granting of this licence was based has changed or is likely to change, they must notify the MMO at the earliest opportunity. Failure to do so may render this licence invalid and may lead to enforcement action.

5.1.6 Licence quantities

Where a licensed activity comprises dredging or the disposal of dredged material, the total quantity of material authorised to be dredged or disposed of in any given time period shall be as set out for that licensed activity in section 4 of this licence.

For each time period, the actual quantity dredged or disposed of shall be calculated by adding the quantity of material dredged or disposed of during that time period under this version of this licence to that dredged or disposed of under any previous version of this licence that was valid during that time period.

5.2 Project specific conditions

This section sets out project specific conditions relating to the licensed activities as set out in section 4 of this licence.

Project specific conditions	
5.2.1	There must be no dredging during the months of February and March. This does not apply to dredging in TERRC Basin in accordance with coordinates in licence schedule 4. Reason: *In order to preserve fish spawning grounds during this critical period.*
5.2.2	There must be no dredging in the period 2 hours either side of low tide between 15 June to 31 August inclusive. This does not apply to dredging in TERRC Basin in accordance with coordinates in licence schedule 4. Reason: *To avoid disturbing the seals.*
5.2.3	If dredging is to be continuous over 24 hours, there must be a window of non-dredging activity of 3 hours on each flooding tide between April and November inclusive. Reason: *To allow fish migration.*
5.2.4	There must be no dredging in the period 2 hours either side of low tide between November to January inclusive. This does not apply to dredging in TERRC Basin in accordance with coordinates in licence schedule 4. Reason: *To avoid disturbing the protected feeding Special Protection Area (SPA) birds.*
5.2.5	If slope failure is identified, the Channel dredging slope failure contingency plan (licence schedule 5) must be followed. Reason:

	To combat the increased scouring along the edge of Seaton channel.
5.2.6	Material dredged from the TERRC basin, Grounding Bed and Quays 7, 8 and 9 must be disposed of with the disposal site Tees Bay A (TY160). Reason: *To ensure material is deposited within the appropriate disposal area.*
5.2.7	Only coatings and treatments can be used that are suitable for use in the marine environment. Reason: *To ensure hazardous chemicals that may be toxic, persistent or bioaccumulative are not released into the marine environment.*
5.2.8	The North Shields Marine Office must be notified of the timetable of works/operations at least 10 days prior to any activities commencing. Reason: *To ensure that the MMO officer is aware of the operations at sea occurring within its jurisdiction.*
5.2.9	Bunding and/or storage facilities must be installed to contain and prevent the release of fuel, oils, and chemicals associated with plant, refuelling and construction equipment, into the marine environment. Secondary containment must be used with a capacity of no less than 110% of the container's storage capacity. Reason: *To minimise the risk of marine pollution incidents.*
5.2.10	Any oil, fuel or chemical spill within the marine environment must be reported to the MMO Marine Pollution Response Team within 12 hours. Within office hours: 0300 200 2024. Outside office hours: 07770 977 825.

	At all times if other numbers are unavailable: 0345 051 8486. dispersants@marinemanagement.org.uk Reason: *To ensure that any spills are appropriately recorded and managed to minimise the risk to sensitive receptors and the marine environment.*
5.2.11	Any man-made material must be separated from the dredged material and disposed of to land. Reason: *To exclude the disposal at sea of man-made material such as shopping trolleys, masonry, paint cans etc.*
5.2.12	During the course of each disposal, the relevant material must be distributed as evenly as possible over the disposal sites TY160 and TY150 respectively. Reason: *To ensure material is deposited evenly within the appropriate disposal area to avoid potential shoaling effects etc.*
5.2.13	A relevant sediment sampling plan request must be submitted at least 6 months prior to the end of years 3 and 6 from the date of issue. The relevant sediment sampling and analysis must be completed by a laboratory validated by the MMO at least 6 weeks prior to the end of years 3 and 6 from the date of issue. The licensed activities must not recommence until written approval is provided by the MMO. Reason: *To ensure only suitable material is dredged and disposed of at sea.*
5.2.14	The relevant sampling during years 3 and 6 of the licence must include sampling for Brominated Diethyl Ethers (BDEs). Reason: *Due to the local historic industrial source of these contaminants in the Tees Estuary.*

5.2.15	The MMO must be supplied with a written statement setting out the continued consideration of alternative options for the use of the dredged material yet to be disposed of no later than 1 February each year. No disposal of material after 1 March each year may be undertaken until this statement is approved in writing by the MMO. Reason: *To provide evidence of the continued consideration of options for dredged material under the waste hierarchy and in accordance with the Marine Policy Statement.*
5.2.16	The MMO must be informed of the location and quantities of material disposed of each month under this licence. This information must be submitted to the MMO by 15 February each year for the months August to January inclusive, and by 15 August each year for the months February to July inclusive using the MMO's online system. Reason: *To allow compliance reporting under the OSPAR Convention agreement as required by Article 4 (3) of Annex II and Article 4(1) of Annex II.*
5.2.17	A notification must be sent to The Source Data Receipt team, UK Hydrographic Office, Taunton, Somerset, TA1 2DN (Email: sdr@ukho.gov.uk; Tel: 01823 337900) of completion of the licensed activities, **no later than 3 weeks after their completion.** A copy of the notification must be sent to the MMO **within one week of the notification being sent.** Reason: *To ensure all necessary amendments to nautical charts and publications are made.*
5.2.18	The District Marine Office must be notified within 10 days of completion of each of the dredging campaigns. Reason: *To keep the local office informed of licensed activities taking place in their area.*

5.2.19	All equipment, temporary structures, waste and/or debris associated with the licensed activities must be removed within 2 weeks of completion of the licensed activities. Reason: *To minimise impacts to the marine environment and other users of the sea/seabed.*
5.2.20	The erosion matting must not be placed on any area of intertidal mud. Reason: *To ensure that the placement of erosion matting does not result in any loss of intertidal mud habitat within Teesmouth and Cleveland Coast Special Protection Area.*
5.2.21	No existing aid to navigation may be altered without the prior written approval of Trinity House. Reason: *To maintain safety of navigation.*
5.2.22	Annual sediment sample analysis for polycyclic aromatic hydrocarbons (PAHs) at sample locations SC1, SC2, and SC3 of **Licence Schedule 7** (Sampling locations) must be undertaken and the analysis results submitted to the MMO. Year one samples must be taken in December 2023 and Year two samples taken in December 2024. The relevant sediment sampling and analysis must be completed by a laboratory validated by the MMO **at least 6 weeks prior** to the end of years one and two from the date of issue of the licence variation. This must be submitted to the MMO for review for two years consecutively unless otherwise agreed and/or required by the MMO. Reason: *To ensure the material remains suitable for disposal at sea.*
5.2.23	Annual sediment sample analysis for Polybrominated diphenyl ethers (PDBEs) at all 14 of the sample locations in **Licence Schedule 7** must be undertaken and the analysis results submitted to the MMO. Year one samples must be taken in December 2023 and Year two samples taken in December 2024.

	The relevant sediment sampling and analysis must be completed by a laboratory validated by the MMO **at least 6 weeks prior** to the end of years one and two from the date of issue of the licence variation. This must be submitted to the MMO for review for two years consecutively unless otherwise agreed and/or required by the MMO. Reason: *To ensure the material remains suitable for disposal at sea.*

6 Compliance and enforcement

This licence and its terms and conditions are issued under the Marine and Coastal Access Act 2009.

Any breach of the licence terms and conditions may lead to enforcement action being taken. This can include variation, revocation or suspension of the licence, the issuing of an enforcement notice, or criminal proceedings, which may carry a maximum penalty of an unlimited fine and / or a term of imprisonment of up to two years.

Your attention is drawn to Part 4 of the Marine and Coastal Access Act 2009, in particular sections 65, 85 and 89 which set out offences, and also to sections 86, 87 and 109 which concern defences. The MMO's Compliance and Enforcement Strategy can be found on our website (https://www.gov.uk/government/publications/compliance-and-enforcement-strategy).