

Oil Spill Contingency Plan Guidelines for Ports, Harbours & Oil Handling Facilities



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Table of Contents	Page Nos
Abbreviations	3
1. Introduction	4
2. Planning for action.....	6
3. The essential elements.....	6
4. Responsible Authority.....	7
5. Risk assessment	7
6. Develop response strategies	9
7. Response guide	10
8. Assess ability to respond	11
9. Area of operation.....	12
10. Command and control	12
11. Communications.....	13
12. Exercises	13
13. Training	13
14. Plan review/amendment	14
15. Record keeping	14
16. Press statement	14
17. Samples	15
18. Interface with other plans.....	15
19. Notifications.....	15
20. Contact directory	16
21. Disposal plan.....	16
22. Action checklist	16
23. Plan design	17
24. Guidance from other Government Departments and Agencies.....	26
25. Getting a contingency plan approved by MCA.....	34
26. Reference material	35
Fig 1. Contingency planning is a continual process	8
Fig 2. Example of a port and harbour contingency plan outline	18
Fig 3. Format for reporting an oil spill.....	20
Fig 4. Example of an action checklist.....	21
Fig 5. Example of a revision record.....	23
Fig 6. Example of a log sheet	24
Fig 7. A response strategy decision guide.....	25

Abbreviations

BOSCA	British Oil Spill Control Association
CCW	Countryside Council for Wales
DETR	Department of the Environment, Transport and the Regions
DOE (NI)	Department of the Environment, Northern Ireland
EA	Environment Agency
EHS	Environment and Heritage Service, Northern Ireland
EN	English Nature
EPS	Emergency Planning Society
IMO	International Maritime Organisation
JNCC	Joint Nature Conservation Committee
MAFF	Ministry of Agriculture, Fisheries and Food
MCA	Maritime and Coastguard Agency
NCP	National Contingency Plan
NI	Nautical Institute
OPRC	Oil Pollution Preparedness, Response and Co-Operation Convention 1990
POLREP	Pollution Report
SEPA	Scottish Environment Protection Agency
SI	Statutory Instrument
SNH	Scottish Natural Heritage
SOAEFD	Scottish Office Agriculture, Environment and Fisheries Department

1. Introduction

In accordance with the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 which came into effect on 15 May 1998, there is a requirement in the UK for ports, harbours and oil handling facilities which fall within the criteria laid out below, to prepare and submit oil spill response contingency plans to the Maritime and Coastguard Agency (MCA) for approval by:

- any harbour for which there is a statutory harbour authority having an annual turnover of more than £1 million, or
- any other harbour or oil handling facility offering berths alongside, on buoys or at anchor, to ships of over 400 GT or oil tankers of over 150 GT, or
- any other harbour or oil handling facility in respect of which the Secretary of State has served the harbour authority or operator (as the case may be), a notice stating that he is of the opinion that maritime activities undertaken at that harbour or facility involve a significant risk of spillage of over 10 tonnes of oil, or
- any harbour or oil handling facility on which the Secretary of State has served the harbour authority or operator a notice stating that he is of the opinion that it is located in an area of significant environmental sensitivity, or in an area where a discharge of oil or other substances could cause significant economic damage.

Over 80% of marine oil spills occur within a port or harbour area. These spills are usually small in nature resulting from normal operations such as loading and bunkering. Depending on its size and location, an oil spill can cause varying degrees of environmental and commercial damage. The prevention of pollution should always be a high priority. Unfortunately, it has to be recognised that despite the rigid enforcement of good working practices, oil spills can and do occur.

There is also a requirement in the regulations for ports, harbours and oil handling facilities to report all oil spills using the format reproduced at Fig 3 on page 20.

An oil spill in a port or harbour area (ie. within recognised harbour limits as specified in local harbour legislation) will require immediate action because of the inevitable close proximity of the spilled oil to the shoreline. Therefore, there is a need for a preconceived plan, an Oil Spill Contingency Plan, to assist in providing the immediate response required. In accordance with the proposed Freedom of Information Act, copies of the plan should be made available to the public on request.

The plan should be compatible with the National Contingency Plan and must be submitted to the MCA as the competent national authority, for approval. As part of the planning process prior to submission of the completed plan, the following organisations must be consulted and involved:

- the Ministry of Agriculture Fisheries and Food (MAFF) in England and Wales, or the Scottish Office Agriculture, Environment and Fisheries Department (SOAEFD) in Scotland;
- the environment agencies (the Environment Agency (EA) in England and Wales, the Scottish Environment Protection Agency (SEPA) in Scotland and the Environment and Heritage Service (EHS) in Northern Ireland);
- the country agencies (English Nature (EN), Countryside Council for Wales (CCW), Scottish Natural Heritage (SNH) and EHS in Northern Ireland).
- adjacent local authorities which have clean up responsibilities on the shoreline (except in Northern Ireland where EHS is responsible for cleaning up shoreline pollution. All contingency plans produced by ports, harbours and oil handling facilities in Northern Ireland must be agreed with EHS before they are submitted to MCA, to ensure they are compatible with that organisation's procedures).

Agreement with these bodies is necessary prior to plans being submitted to MCA. Failure to do so will delay the granting of approval by MCA and may result in the plan being returned to the submitting authority/operator.

It is not possible to produce a standard plan to respond to oil spills. Each plan must be customised to suit the area for which it has been produced. A range of factors will affect the response to an oil spill. The quantity of oil spilled, the type of oil, the location of the spill, the prevailing weather and tides, the organisational structure within the port and availability of equipment and trained personnel are amongst the factors which need to be considered during the development of a plan.

The following guidelines have been produced to assist in the production of a plan. They are intended as a starting point. Although the guidelines are aimed primarily at oil spills they should be flexible enough to incorporate other types of incidents and other forms of pollution.

2. Planning For Action

The purpose of the plan is to provide direction and guidance to those involved in responding to an oil spill incident and to set in motion all the necessary actions to stop or minimise the pollution and to reduce its effects on the environment. The development of the plan should be seen as a process which will highlight the planning required before an incident and the actions required in the event of an oil spill. It should also flag-up any deficiencies in ability to respond. It should be seen as an ongoing process with the plan requiring exercising and updating.

3. The Essential Elements

For a plan to be effective it needs to be clearly laid out and user friendly and it should contain certain essential elements.

- Responsible Authority and boundary of plan's operation
- Command and control arrangements
- Notification procedures
- Communications plan
- Evidence of adequate risk assessment
- Details of local sensitivities including environmental sensitivities
- Pre-agreed response strategies
- Detailed actions for individuals during an incident

- Health and safety aspects
- Response capability listing (personnel and equipment)
- Contact directory
- Interface with other plans eg plans maintained by local authorities, country agencies (EN, CCW, SNH, EHS), environment agencies and estuary management plans
- A disposal plan
- Training and exercise programme
- A system for updating and revision

4. Responsible Authority

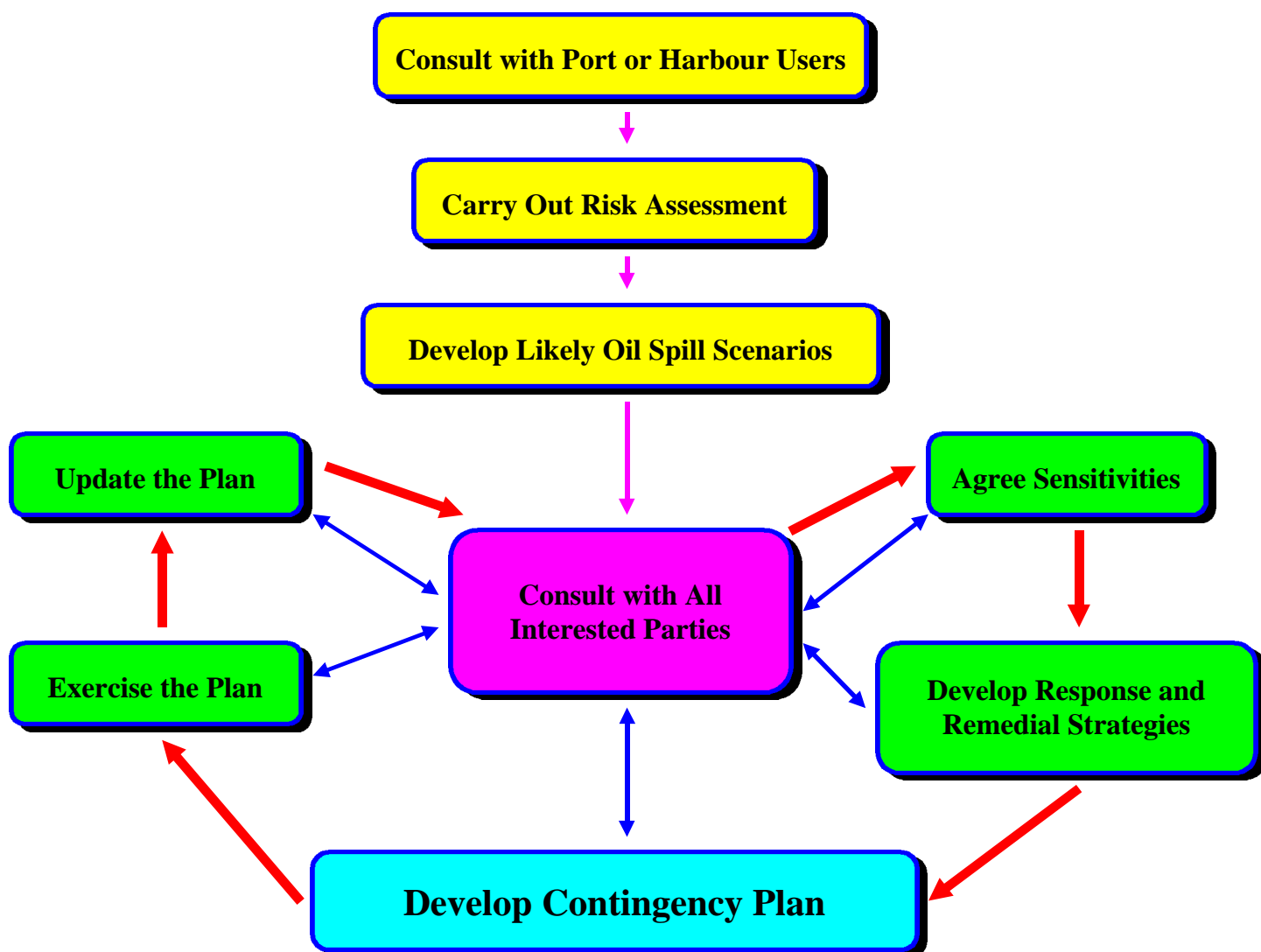
The plan must include a paragraph which states the name of the Authority/body responsible for the overall execution of the plan. Similarly, plans which cover more than one facility, e.g. a number of ports, harbours and oil handling facilities in a geographic area, must contain a statement that all those organisations are in agreement with the plan and will co-operate in its testing and implementation.

5. Risk Assessment

Before a plan can be developed a risk assessment of the area needs to be undertaken. The complexity of this assessment will vary greatly from port to port depending on the size and the diversity of the area to be covered. Consideration should also be given to the implications of the time of the year that a spill may occur.

The locations of all potential oil spill sites and an estimation of the size of the potential spills need to be identified. Consultations should be carried out with all port users on a regular basis, recognising that as the cargoes handled may alter, so may the demands on the contingency plan. The perception of risk might be based on the level of shipping traffic, any navigational hazards, types of traffic (tanker or non-tanker *etc.*), size of vessels, types of oil handled, location of oil handling facilities and any passing tanker traffic. Historical data for the port or from similar ports can assist with these predictions. Establish the probability of more than one spill occurring at any one time.

Figure 1 Contingency Planning is a continual process



Likely operational spills, possible medium size spills and worst case spills need to be identified.

A prediction of the fate and movement of the identified potential spills is also needed. All environmental and commercially sensitive areas likely to be adversely affected by a spill should be identified. Consultations should be held with local port users including commercial and leisure users, marinas, yacht clubs, water extracting industries, fishing interests, environmental and wildlife conservation groups and local land owners, to mention but a few. Coastline environmental sensitivity mapping of certain areas has been carried out by environmental agencies and oil companies. For example, MCA has access to an Atlas of Coastal Sites Sensitive to Oil Pollution which details the environmental sensitivities for the coasts of England, Wales, Scotland, the Orkney Islands, the Western Isles and the Shetland Islands. The Joint Nature Conservation Committee (JNCC) has coastal directories which are useful sources of information which require updating and must be supported by local consultations and site visits.

It will be necessary to determine the time it will take any likely spill to impact the identified sensitive areas. Predictions can be made using local tidal data, wind and weather information. The knowledge and experience of local mariners will be invaluable for these predictions. This will give an indication of the response times required to minimise impact on the identified areas. A response needs to match these local conditions.

6. Develop Response Strategies

Different types of shoreline and habitats require different strategies. The type of oil also has an effect. To ensure a rapid response and increase the effectiveness of a clean-up operation, response strategies, so far as possible, should be agreed in advance.

Whenever an oil spill is threatening more than one resource, some prioritisation will be required, so that the resource for which there is most concern is protected first and most effectively. However, one person's view of the most important resource may differ from another person's view. These priorities must be agreed in advance with all interested parties to ensure time is not wasted trying to agree during an incident. Some of the most often argued issues include:

- Use of dispersants. Dispersants remove oil from the surface of the sea, thereby protecting birds, but the oil is then placed into the water column which can affect fish and the marine environment. In addition, dispersants are only suitable for dealing with certain types of oil and may not be effective on weathered oil. These and other factors are taken into account when considering their use.
- Protection of ecologically sensitive shorelines, such as saltmarshes, or economically sensitive areas, such as marinas. It is not possible to put a realistic monetary value on the natural environment, and short-term economics often wins the argument. Furthermore, it is often very difficult to protect long stretches of saltmarsh. However, if the recovery potential of the two areas is considered, it is likely that the effect on the natural resource will be for a great deal longer.
- Shoreline clean-up of an ecologically sensitive area, like a saltmarsh, which may recover more quickly if left alone. Public and political pressure may force the responders to carry out immediate clean-up, which may do more ecological damage in the long-term. Experienced advisors and pre-

planning for such areas must assess the value of short-term economic and amenity value, against the longer term ecological value.

Any use of dispersants must be specifically approved by MAFF in England and Wales and SOAEFD in Scotland. In Northern Ireland, permission must be sought from EHS (DOE NI). However, in some cases these departments may issue a “standing approval” which allows the holder to apply a limited quantity of dispersant to a spill urgently, without having to seek further approval. All standing approvals are subject to conditions which must be rigidly adhered to.

7. Response Guide

Although a Response Guide is no substitute for up to date advice in a spill, it is an integral part of the plan. The guide should be designed in map or chart form to be easily understood by personnel without too much specialist environmental knowledge. The map should be of sufficient scale to clearly and accurately show the required detail. Care should be taken not to overload the map with information. Clear symbols should be used together with a legend.

Suggestions of what should be included are set out in the list below.

- Environmental sensitivities
- Commercial sensitivities
- Recreational and amenity areas
- Hydrographic details
- Areas suitable for protection
- Methods of protection
- Pre-agreed oil collection sites
- Details of access to sites
- Load bearing characteristics
- Indications of pre-agreed response strategies

8. Assess Ability to Respond

A realistic assessment of the port or harbour's ability to respond to the identified potential spills is required. Considerations should include the availability of trained response personnel, response equipment, transportation, communications, the mobilisation time, access to potential clean-up sites *etc.*

The identified likely spills should be classified to assist with determining the correct level of response. The level of response will be dependent on a number of factors; the quantity of oil spilled, the type of oil and spill location and its proximity to available response resources. An internationally recognised three tier oil spill classification system is as follows;

Tier One:	Small operational spills. A spill that can be dealt with immediately Utilising local resources without assistance from other areas.
Tier Two:	Medium sized spills. A spill that requires regional assistance from other Areas. May involve assistance by local government.
Tier Three:	Large spills. Beyond the capability of local and regional resources. A Spill that requires national assistance through implementation of the NCP.

In reality oil spills do not fall into convenient categories and there will be grey areas of overlap between the tier boundaries. Accurate quantification of oil spills is difficult. For the purpose of planning it will be necessary to define each tier in relation to a quantity of oil spilled.

The port or harbour must be able to respond immediately and have the ability to cope with the identified likely operational spills, Tier One oil spills, with its own resources.

Additional resources are needed to cope with the identified possible medium sized spills, Tier Two oil spills. Resources may be available through mutual help agreements with other ports, oil companies and local authorities. In Northern Ireland, resources will be available through EHS. Care must be taken by the company or authority offering the assistance that it does not expose its own area to an unacceptable level of risk. Resources may also be available from oil spill contracting companies. In both cases there must be a formal agreement in place to ensure that a response will be guaranteed in the event of an incident.

Assistance will be available from national resources to cope with major worst case scenario spills, tier three spills. The NCP will be activated. The port or harbour contingency plan must show how it will co-ordinate with the MCA in the case of a large scale response. A command centre with adequate facilities should be identified. Areas suitable for the storage of the inevitable large amount of equipment required may also need to be identified.

Any deficiency of equipment and trained personnel can be determined by comparing the level of personnel and equipment realistically required to respond immediately to a tier one oil spill with what is currently available. Any deficiencies will need to be rectified. Plans are required to ensure availability of resources for a tier two or tier three spill.

9. Area of Operation

The geographical area of operation for the plan will extend to the recognised port or harbour limits. The port or harbour authority must be capable of responding to incidents within the specified area. The area must be clearly described in the plan. The use of a colour chart or map is recommended.

10. Command and Control

The command and control arrangements for an incident will need to be specified. For a tier one incident it will probably follow the usual management structure as it applies to day to day operations. But when an incident has escalated to tier two or three, special arrangements will have to be put in place.

11. Communications

Good communications are vital during an oil spill. A plan must be drawn-up to describe the methods of communications to be used during an incident. This must include communications for the initial notification, subsequent mobilisation and ongoing operations by the response team. Remember, the response is likely to be remotely located from the command team. The need for 24 hour communications must be recognised in the communications plan.

12. Exercises

For the plan to be of value it must be familiar to those expected to use it. The plan should be exercised to ensure it functions as expected. Regular exercises are then necessary to ensure everyone remains familiar with the plan. A series of exercises should focus on certain aspects of a response (communications, equipment deployment, notifications, etc.) to ensure each element can operate efficiently. A complete exercise should be carried out annually to include call out, establishment of a command centre, deployment of equipment, interface with other plans and communications with outside agencies.

13. Training

For an oil spill response to be effective all personnel involved must have an understanding of their responsibilities. They must also be competent to fulfil their roles. Oil spill response is a specialised subject and requires specialised training. All members of the response teams should undertake training from an accredited training centre. Oil spill training centres in the UK which meet the national standard (based on IMO model courses) in oil spill response training are accredited by the Nautical Institute on behalf of MCA. Details of accredited training centres are available from the NI - see page 36. Details of courses which have been specifically developed for ports and harbours are available from BOSCA (see page 36).

14. Plan Review/Amendment

A plan can rapidly become out of date, particularly with regard to contact details. An out of date plan can cause unnecessary delays in the event of an incident. To ensure the plan remains accurate it must be reviewed at least annually.

Following the use of the plan in an exercise or in an oil spill incident, its effectiveness should be evaluated. Feedback from the participants in the exercise or incident is important, and the plan reviewed to include any modifications.

A revision record should be included in the plan. All revisions must be submitted to the MCA for approval.

15. Record Keeping

It is important to log and keep a record of all events during an incident. This will assist if liability, compensation or reimbursement issues arise as a result of the incident. Guidance on the keeping of appropriate records during an incident should be given in the plan. The record should include details of all actions taken, communications with outside agencies, a summary of all key decisions made and details of all expenditure incurred. This information will also be useful during the review of the plan following an incident.

16. Press Statement

Oil spills by their nature spark off intense media interest. Guidance should be included in the plan on handling the media during an incident. The guidance should be designed to reduce the burden of the people in charge, allowing them to deal with the emergency in hand. A pre-written proforma press "holding" statement should be included in the plan.

17. Samples

Procedures for the taking of samples should also be included. As samples may be required as evidence in legal proceedings it is essential to have a procedure in place for collection to ensure their authenticity cannot be challenged. Guidance on the method of collecting, bottling, sealing, packaging and boxing, and labelling and addressing of samples is given in STOp Notice 2/98 available from MCA.(email "stone@mcagency.org.uk")

18. Interface with other Plans

Reference should be made to any links with local installations, local authority, country nature conservation and environment contingency plans. The plan's ability to interface with the NCP must also be described. Abstracts of any relevant sections from other contingency plans should be annexed in the plan for reference.

19. Notifications

The plan must contain details of all parties to be advised in the event of an incident. The individual responsible for ensuring that the notifications have been made should also be identified. It is likely that different levels of incident will require varying notification needs. These needs should be identified in advance and included in the plan.

The information should be displayed in an easy to follow format. Clear guidance should be given regarding the preferred method of communications (telephone, fax, mobile phone, etc.)

20. Contact Directory

The plan requires a detailed contact directory which should contain contact names, addresses, telephone, fax, pager and telex numbers likely to be useful during a spill. This section will require regular updating more often than any other section of the plan, so it is advisable to avoid the inclusion of contact details in other sections of the contingency plan in order to simplify the updating process.

21. Disposal Plan

Recovered oil must be disposed of properly. A plan must be drawn up to deal with the expected quantity of recovered material resulting from an incident. This will involve the identification of suitable temporary storage facilities and vehicles or vessels for transportation. The identification of final disposal sites for the recovered oil can be difficult as availability may fluctuate due to local conditions and changes in legislation. The minimum requirement should be to identify a temporary holding area where the wastes can be segregated and stored pending a decision on the final disposal options.

Disposal can be a major logistical problem. All these considerations must be made in advance and agreed with all interested parties, particularly the EA in England and Wales, SEPA in Scotland and EHS in Northern Ireland. The country nature conservation agencies also need to be consulted.

22. Action Checklist

An action sheet should contain a clear list of actions to be taken by an individual in response to a given incident. The type of incident and the job title of the person for whom it has been written should be clearly stated at the top of the checklist. The responsibilities of the individual should also be listed. The checklist should cover the actions required in the initial stages and then key actions required during the response.

Care must be taken to ensure that the actions detailed for an individual are compatible with those detailed for others, any links should be indicated to avoid confusion or duplication of effort. The actions can reference other information held in the plan, e.g. Notification Matrix, report forms, sensitivity maps *etc.* A typical Action Checklist is shown in Fig. 4.

23. Plan Design

The plan should be written using a good word processing package. It can then be stored on a computer hard drive, network or floppy disk. The plan can be easily amended as required.

For ease of use during an incident the plan should be produced in hard copy form, preferably on A4 paper contained in a ring binder. The plan needs to be updated easily which will involve the removal of individual pages or sections.

During an incident it will also be useful to be able to remove pages for photocopying. Copies of action sheets, sensitivity maps, clean-up guidelines and contact details are likely to be required by members of the response team.

There should be three main parts to a plan - Part 1 strategy, Part 2 action, and Part 3, information. Any additional useful information can be annexed. The sections should be clearly marked with printed dividers to ensure swift and easy access to the information required. The action section, in particular, should be highlighted.

The strategy section should contain information required during the planning stage of the process and will be useful for reference.

The action section is the most important section. The user should be able to instantly identify and select the information required and be able to follow a clear path of actions. This section should also contain any information that is required to make immediate decisions in response to an incident. The introduction should include an index so that the relevant information can be accessed immediately.

The information section should contain any information that will be required during an incident. Contact details, resources listings and information on products expected to be used should be included. The following is a suggested outline for a contingency plan.

Figure 2 Typical Port and Harbour Contingency Plan Outline**Part 1: Strategy**

- Section 1 Introduction and Policy
 - 1.1. Purpose of the Plan
 - 1.2. Use of the Manual
 - 1.3. Area of Operation
 - 1.4. Identification of lead authority and other authorities represented in an area plan
 - 1.5. Scope of the Plan
 - 1.6. Risk Assessment
 - 1.7. Environmental sensitivities and priorities for protection
 - 1.8. Categories of Incident
 - 1.9. Disposal
 - 1.10. Plan Revision

- Section 2 Training and Exercise Policy
 - 2 1 Training Policy
 - 2 2 Exercise Programme

- Section 3 Incident Response Organisation
 - 3 1 Introduction
 - 3 2 Responsibilities and Incident Control Arrangements
 - 3 3 Standing Approval to use Dispersants (if appropriate)
 - 3 4 Interface with other Contingency / Emergency Plans
 - 3 5 Internal Alerting and Call Out Procedures
 - 3 6 Liaison procedures with other agencies (see section 10)

- Section 4 Response Strategies
 - 4 1 Health and Safety
 - 4 2 Oil Spills
 - Heavy Fuel Oil
 - Crude Oil
 - Diesel Oil
 - 4 3 Disposal Plan

Part 2: Actions

- Section 5 Action Sheets
 - 5 1 Index
 - 5 2 Observer of the Incident
 - 5 3 Harbour Master
 - 5 4 General Manager

- Section 6 Communications
 - 6 1 Notification Matrix
 - 6 2 Communications Plan

- Section 7 Site Specific Response Information

- Section 8 Report Forms and Checklists
 - 8 1 Oil Spill Report Form
 - 8 2 Report on Dispersant Use (where appropriate)

- Section 9 Press and Public Information
 - 9 1 Proforma Press Statement

Part 3: Information

- Section 10 Contact Directory
- Section 11 Resources Directory
- Section 12 Product Information Sheets

Appendices

- Appendix 1 General Response Information
- Appendix 2 Information from Local Installation Plan

Figure 3 Reporting Pollution: Format of CG77 POLREP

Part 1 - Information which should be provided in an Initial Pollution Report

- A CLASSIFICATION of Report:
- (i) Doubtful;
 - (ii) Probable; or
 - (iii) Confirmed.
- B DATE & TIME pollution observed/reported, and identity of observer/reporter.
- C POSITION & EXTENT of pollution.
(By latitude and longitude if possible, state range and bearing from some prominent landmark and estimated amount of pollution, e.g., size of polluted area; number of tonnes of oil spilled; or number of containers, drums etc lost. When appropriate, give position of observer relative to pollution.)
- D TIDE and WIND - Speed and Direction.
- E WEATHER Conditions & SEA State.
- F CHARACTERISTICS of pollution.
(Give type of pollution, e.g., oil, crude or otherwise; packaged or bulk chemicals; or garbage. For chemicals, give proper name or United Nations Number, if known. For all, give also appearance, e.g., liquid; floating solid; liquid oil; semi-liquid sludge; tarry lumps; weathered oil; discolouration of sea; visible vapour; etc.)
- G SOURCE and CAUSE of pollution.
(e.g., from vessel or other undertaking. If from vessel, say whether as a result of apparent deliberate discharge or a casualty. If the latter, give a brief description. Where possible, give name, type, size, nationality and Port of Registry of polluting vessel. If vessel is proceeding on its way, give course, speed and destination, if known.)
- H Details of VESSELS IN THE AREA.
(To be given if the polluter cannot be identified and the spill is considered to be of recent origin.)
- J Whether PHOTOGRAPHS have been taken, and/or SAMPLES for analysis.
- K REMEDIAL ACTION taken, or intended, to deal with spillage.
- L FORECAST of likely effect of pollution.
(e.g., arrival on beach, with estimated timing.)
- M NAMES of those informed other than addresses.
- N Any OTHER relevant information
(e.g., names of other witnesses, references to other instances of pollution pointing to source.)

Part 2 - Supplementary Information to be provided later.

(This section may be disregarded when POLREPS are for UK internal distribution only.)

- O RESULTS of SAMPLE analysis
- P RESULTS of PHOTOGRAPHIC analysis
- Q RESULTS of SUPPLEMENTARY ENQUIRIES
(e.g., inspection by Surveyors, statements from ship's personnel etc, if applicable.)
- R RESULTS of MATHEMATICAL MODELS.

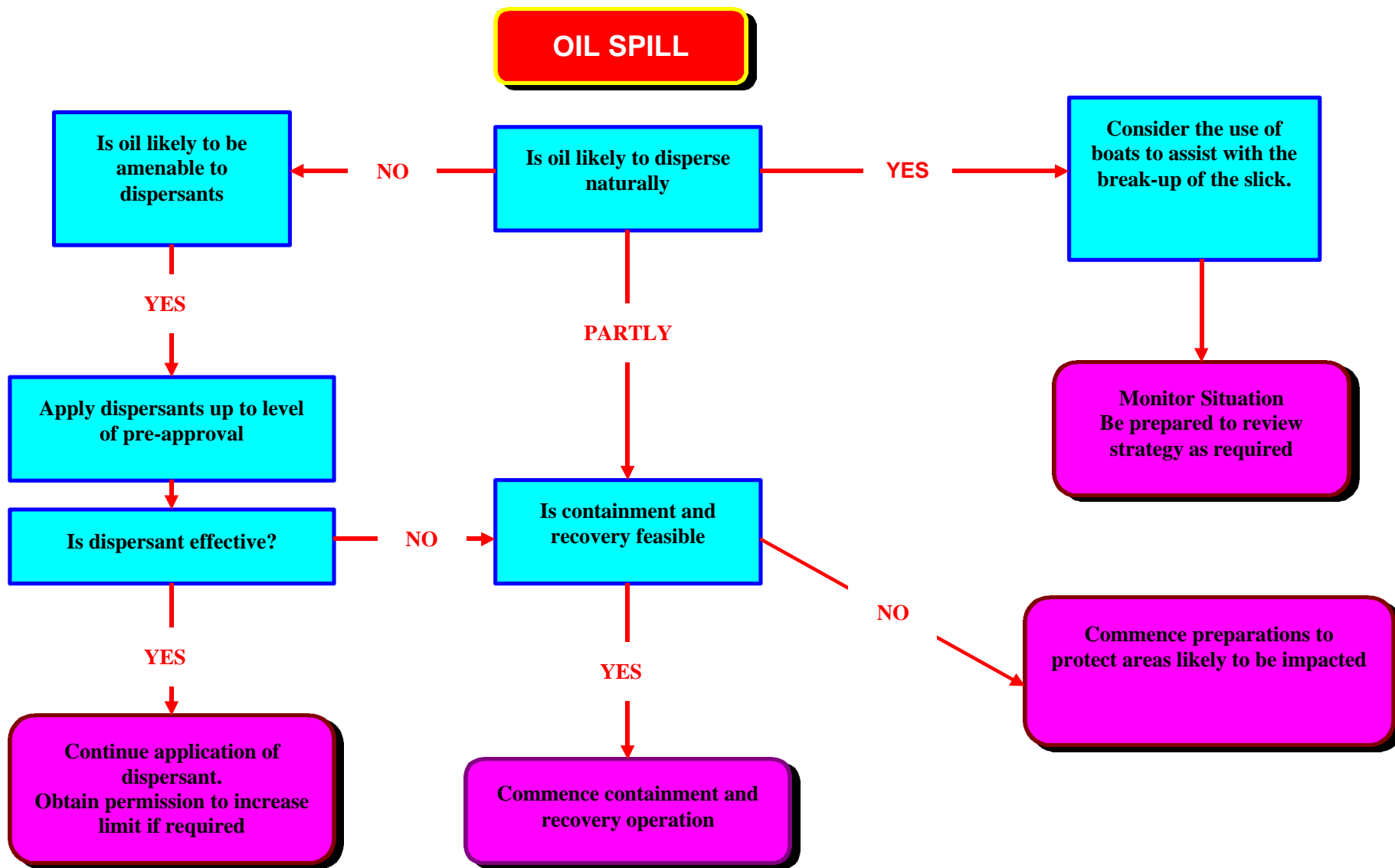
Figure 4 Typical Action Checklist

5.3	Harbour Master		
5.3.1	Incident	Oil Spill	
Responsibilities	Assumes initial responsibility for spill response Deputises for the General Manager in his absence Carries out initial response call-outs and notifications Directs Harbour personnel as required by the nature of the incident		
RESPONSE ACTIONS		Additional Information	Completed/Notes
1	Receive notification of the incident	Note all relevant details. Log information in the Oil Spill Report Form, Section 8.1. (This information will be required later)	
2	Ensure precautions have been taken to ensure the safety of all personnel with access to the affected area.		
3	Ensure measures have been taken to stop the spillage.		
4	Commence log of events	See log sheet in section 5.3.1	
5	Establish level of incident	See flow chart on Page 5.8.2	
6	Mobilise oil spill response teams in accordance with the level of incident	See decision guide on Page 5.8.5 Call Maintenance Shift Supervisory (See contact section)	
7	Ensure all relevant bodies are notified as per the notification matrix.	See Notification Matrix on Page 6.2	
8	Ensure that samples of the spilt oil are taken.	See Checklist 5.3.3	
FURTHER ACTIONS		Additional Information	Completed/Notes
9	Stand down response team when clean-up has been completed	Consult with Response Team Leader and the General Manager	

6.1 Notification Matrix					
	Oil Spill Tier			<i>For contact numbers see Section 9 Contact Directory</i>	
Organisation	1	2	3	✓ Method	Remarks
Coastguard				Telephone	Coastguard will require information on the Oil Spill Report Form in Section 8.1. Confirm details with fax. Coastguard will inform the Marine Pollution Control Unit.
Harbour Police				VHF Ch. 10 or Mobile telephone	Contact immediately.
Local Authority	✓			Telephone, Fax	Contact the Oil Pollution Officer only if oil is likely to contaminate the shoreline.
National Power				Telephone	Contact Shift Manger immediately if oil is likely to reach the power station sea water intakes.
Local Refinery	✓			Telephone	Contact Duty Marine Manager if oil is likely to impact facility. May offer assistance.
City Council	✓			Telephone	Contact Emergency Planning Officer.
Environmental Agencies				Telephone, Pager	Contact if spill has originated from a land based source. Confirm by fax.
Oil Spill Contractor	*			Telephone	Contact the 24 hr contact number and ask for the Duty Manager. * Telephone if a Tier 1 response is operated by a contractor.
Country Nature Conservation Agency	✓			Telephone, Pager, Fax	Fax all spills. Contact if spill exceeds one tonne.
MAFF / SOAEFD / EHS				Telephone, Fax	Contact if use of dispersants is being considered, or have been used under a standing approval, or if emergency use made without prior permission.

Notify immediately by method described. ✓ Notify during normal working hours, see Section 9

Figure 7 A Simple Response Strategy Decision Guide



24. Guidance from other Government Departments and Agencies

To assist ports, harbours and oil handling facilities in preparing their plans, the following organisations have produced guidance on what they would want to see in a contingency plan.

A. England and Wales

- **MAFF**

MAFF has two main areas of interest.

1. Oil Treatment Products. If the use of any oil treatment products such as dispersant, surface cleaner (for structures such as walls and piers) or loose sorbent is being considered as part of an oil spill response, this should be fully described in the plan. It is a statutory requirement that all such products must be tested and approved by MAFF, and that further specific MAFF approval must be sought before they are deposited in the sea. It is therefore important that the plan describes the products which will be used; re-testing or replacement procedures for old stocks of those products; the types of oil which might potentially be spilled in the area covered by the plan and therefore require treatment; and in which parts of the area dispersant spraying may or may not be considered as a response method. The plan should also explain how to contact MAFF in the event of permission being required to use an oil treatment product, and the type of information which would be included in the subsequent report to MAFF on the results of using the product.

When submitting the plan, permission may also be sought for a “standing approval” which would allow use of an appropriate quantity of a specified oil treatment product or products on a spill without having to seek specific MAFF approval at the time of the incident. This is designed to help facilitate rapid response to a spill in areas where there are no special environmental sensitivities. In requesting a standing approval it is necessary to specify the volume and type of product which the approval is to cover, the areas to which the approval would apply and the types of oil on which the product would be used. MAFF will not issue a standing approval until the terms of the contingency plan have been agreed by EN or the CCW, and by MCA.

2. Fisheries. The plan should also comment on the potential effect of an oil spill on local fisheries interests and describe the remedial action to be taken to protect them. This should include details of how to contact the local MAFF Fisheries Office to inform them of the spill, and arrangements for alerting fishermen who may use the harbour or its adjacent waters. Fisheries’ interests which should be considered in preparing the plan include shellfish beds; the placement of pots or fixed netting; sea-water intakes to storage tanks or aquaria; and fish held in pots or nets alongside or underneath fishing vessels. The plan should also refer to the fact that MAFF or the Welsh Office have powers to introduce a fisheries closure order as a precautionary measure if necessary to protect consumers from eating potentially contaminated fish or shellfish.

Further information including a more detailed paper explaining MAFF's requirements for contingency plans, and a booklet entitled "The Approval and Use of Oil Dispersants in the UK" are available from Marine Policy Branch, Room 150, MAFF, 17 Smith Square London SW1P 3JR. Telephone 0171 238 5879, fax 0171 238 5881.

- **Environment Agency**

1. Notification and Communications. The Agency should be informed of all oil spillages regardless of the level of the incident. Notification can be made by calling the Agency's Emergency Hot Line (0800 807060) or direct to the relevant Regional Communications Centre using a dedicated x-directory number. Both lines are operational 24 hours/day, 365 days/year.

Anybody requiring advice or guidance on any aspect of the contingency plan which involves the Agency, can contact their local Environment Protection Department using the Agency general enquiries line (0645 333111) during normal working hours.

2. Risk Assessment. In addition to the locations of all potential oil spill sites being identified, there should be an assessment of the precautions that need to be taken in order to protect these sites particularly the high risk ones. This would normally involve examining protective booming measures and deciding whether to deploy the booms prior to an incident or make arrangements to gain access to such booms at short notice. Careful consideration of tides and weather would need to be considered prior to deploying booms.

Sensitivity mapping of the coastal environment should be produced in a nationally recognised standard format, and ideally in the same format agreed for estuaries. All plans should clearly identify environmentally sensitive sites including any water abstraction points.

3. Pre Agreed Response Strategy. The contingency plan should highlight this area in detail and should link into the County Oil Plan so that it can cover both oil spills from port sources and from coastal sources that enter the port. The plan should be agreed by all parties involved including the Agency and should have support from all those involved in the spill response. The plan should again conform to a standard format, and would include details of agreed.

- booming sites
- temporary holding sites for contaminated oil
- long term disposal options for contaminated oil

4. Exercises. The plan must involve regular testing of all aspects of communications with the Agency as well as more operational aspects of the plan such as boom deployment. The plan holders should explore the

possibilities of joint exercises wherever possible. The Agency will (resources permitting) endeavour to participate in any such exercise.

The plans should include mechanisms for reviewing and updating the information contained within the plan particularly in light of “lessons learned” from real incidents and exercises.

5. Disposal Plans. The Agency would want to see clear evidence that realistic and workable plans had been made as the Agency has a regulatory duty to:

- authorise sites for temporary storage and treatment
- ensure disposal sites are appropriately licensed including the issuing of new or modified licenses within a short period of time
- ensure oily waste is transported by registered carriers and complies with conditions of the Special Waste Regulations.

- **CCW (Wales)**

- Consult relevant coastal directory, as produced by JNCC for preliminary identification of sensitive sites and important coastal and marine areas for wildlife. Ports should be aware that these directories are indicative only.
- Produce preliminary map(s) of port or harbour areas showing location of known sensitive sites. CCW can provide digital copies of all statutory coastal and marine site boundaries for overlaying.
- Produce preliminary response/clean up regime for areas identified above.
- Consult with relevant local CCW office. Advice will be given on:
 - capture of all sites and locations for consideration under OPRC, and
 - appropriateness of response/clean up method allocated.
- Provide details of any applications to MAFF for prior approval of use of dispersants.
- For general enquiries on OPRC contact Sarah Soffe, Maritime Policy Officer, CCW, Plas Penrhos, Ffordd Penrhos, Bangor, Gwynedd, LL57 2LQ. Telephone 01248 385500.
- For specific port/harbour enquiries please contact:
 - SE Wales - Richard Jones 01222 772400
 - SW Wales - Jennifer Dack 01437 766646

- NW Wales - Mike Willis 01248 373100
- NE Wales - Lorrie Rees 01352 754000

Environment Agency, Emergency Management, Head Office, Block 1, Government Buildings, Burghill Rd, Westbury-on-Trym, Bristol. Telephone 01179 142611, fax 01179 142614.

EN, Maritime Team, Northminster House, Peterborough PE1 1UA. Telephone 01733 455000, fax 01733568834

JNCC, Dunnet House, 7 Thistle Place, Aberdeen, AB10 1UZ. Telephone 01224 655701, fax 01224 621488

MAFF (as above)

DETR - Marine, Land and Liability Division, Ashdown House, 123 Victoria Street, London SW1E 6DE. Telephone 0171 890 5316, fax 0171 890 5309

Welsh Office, Environment Division, Cathays Park, Cardiff, CF1 3NQ. Telephone 01222 825111, fax 01222 823658

Local Authorities. Contact Emergency Planning Society Oil Pollution Working Group (covers England, Scotland, Wales and Northern Ireland), c/o David Brown, Lancashire County Council Emergency Planning, "Westleigh", Lea Road, Lea, Preston PR4 0RB. Telephone 01772 729397, fax 01772 733378.

B. Scotland

• SOAEFD

The Scottish Office Agriculture, Environment and Fisheries Department (SOAEFD) has overall responsibility for protecting the marine environment and fisheries in the Scottish sector of UK waters and in fulfilling this role is the relevant licensing authority for deposits in the sea. Further information on the role and responsibilities of SOAEFD can be obtained from the Marine Environment and Wildlife Branch, Room 414, Pentland House, 47 Robb's Loan, EDINBURGH EH14 1TY. Telephone 0131-244-6233. Fax 0131-244-6313.

OIL TREATMENT PRODUCTS

The oil spill plan should include a section on any oil treatment products such as dispersant, surface cleaner (for structures such as walls and piers) or loose sorbent being considered as part of the oil spill response. It is a statutory requirement that all products must be tested and approved by MAFF, approval by SOAEFD for use in "Scottish waters" follows automatically, and that where appropriate, further specific SOAEFD approval must be sought before they are used at sea. The relevant legislation is Part II of the Food and Environment Protection Act 1985 (FEPA) and the Deposits in the Sea (Exemptions) Order 1985. Under the Order the permission of the licensing authority (SOAEFD) must be obtained for all usage of chemical dispersants etc at sea in shallow waters. Shallow waters are defined as areas of the sea where the water depth is less than 20 metres or within one nautical mile of any such area. Outwith these areas a licence is not required subject to the condition that the manufacturer has had the substance approved for use, that it is used in accordance with the conditions of that approval and that if appropriate it has been retested for efficacy within the prescribed periods.

It is therefore important that the plan should accurately describe the products held or are likely to consider using; testing or replacement procedures for old stocks of those products; the types of oil which might potentially be spilled in the area covered by the plan and therefore require treatment; and in which parts of the area dispersant spraying may or may not be considered as a response method. The plan should also include details of how to contact SOAEFD in the event of permission being required to use an oil spill treatment product (up to date contact details are circulated frequently or can be obtained at any time during normal office hours from SOAEFD by telephoning 0131-244 6234 or sending a fax to 0131 244 6313). The plan should also describe the type of information which should be provided to SOAEFD in a report on the results of using any dispersant.

When submitting the plan permission may be sought for a 'standing approval' which would allow the use of a limited quantity of a specified oil treatment product or products on a spill without having to seek

specific SOAEFD approval at the time of an incident. This is designed to help facilitate rapid response to a spill in areas where there are no special environmental sensitivities. In requesting a standing approval it is necessary to specify the volume and type of product which the approval is to cover, the areas to which the approval would apply, the types of oil on which the product would be used and the likely method of application. SOAEFD will not issue a standing approval until the terms of the contingency plan have been agreed by SNH, and by MCA.

NB Approved oil dispersants and other oil spill treatment products may be used without prior consultation with the licensing authority where there is genuine risk to human life or to the safety of an installation or vessel - for example, where there is serious danger from fire or explosion. The use of dispersants etc in such circumstances should always be reported to the licensing authority as soon as possible after the immediate danger has passed.

FISHERIES

The plan should also comment on the potential effect of an oil spill on local fisheries and describe the remedial action to be taken to protect them. This should include details of how to contact the local office of the Scottish Fisheries Protection Agency and the relevant District Salmon Fishery Board to advise them of the spill, and the arrangements for alerting fishermen who may use the harbour or its adjacent waters. Fisheries interests which should be covered in preparing the plan include shellfish beds; fixed gear such as creels, pots or fixed netting; salmon fishing rights; fish and shellfish farms; and sea-water intakes to storage tanks or aquaria. The plan should also refer to the fact that SOAEFD has the power to introduce a fisheries closure order as a precautionary measure if necessary to protect consumers from eating potentially contaminated fish or shellfish.

• **SEPA**

1. Introduction and Scope

- Definitions and responsibilities including management and team structures
- Organisation including interface with other emergency plans and the NCP
- Communications within and between the different organisations
- Equipment, location storage and maintenance
- Manpower and training
- Procedures especially for handling the spill, casualties, minimising effects
- Classification, reporting, logging, enforcement action
- Strategy for clean up (at sea and on land), including sensitive areas, use of dispersants, standing permissions, getting authorisation

- Use of other equipment/methods
- Temporary storage and final disposal
- Logistic support
- Incident closure plan
- Public relations and the media
- Environment response plan
- Health & safety
- List of participants, telephone and fax numbers, e-mail address
- Structure of call-out, information dissemination and substitutes or deputies
- Lists of equipment

More information is available from SEPA at Erskine Court, The Castle Business Park, Stirling, Scotland FK9 4TR. Telephone 01786 457700, fax 01786 446885.

SNH, 2 Anderson Place, Edinburgh EH6 5NP. Telephone 0131 446 2434, fax 0131 446 2405.

C. Northern Ireland

• EHS

1. A clear statement on the duties, powers and jurisdiction of EHS and the port authority along with the other organisations which have responsibilities of an advisory or operational nature in response to incidents or emergencies involving oil pollution in tidal waters. Other forms of water pollution should also be covered.
2. A statement on which organisation is the lead agency in responding to water pollution which affects the marine environment. This should cover the various sources from which the pollution originates i.e. ships, land-based, pipelines or from a riverine source.
3. Notification procedures to be used to alert EHS to water pollution incidents within the port authority area and the guidelines as to what EHS will be notified of, and when.
4. Sampling procedures to be followed for collecting any necessary samples which will comply with legislation in force in Northern Ireland.
5. Reference should be made to the EHS Water Pollution Incident Response Procedures and how the local plan fits in with these procedures and MCA's NCP.

For further information contact EHS, Calvert House, 23 Castle Place, Belfast BT1 1FY, telephone 01232 254754, fax 01232 254777.

25. Getting a Contingency Plan Approved by MCA

The completed plan should be sent to MCA at the address on the cover of this guidance. A statement should appear at the front of the plan, confirming that: -

- the plan has been drawn up following consultation with the statutory consultees (MAFF, SOAEFD, the environmental agencies and the country agencies), local authorities and others who are likely to be affected by the plan;
- the plan has been agreed by the statutory consultees
- if the plan covers more than one port, harbour and / or oil handling facility, each party to the plan is in agreement with its contents and will co-operate in exercising the plan and implementing it following an incident.

MCA will contact the submitting authority to resolve any queries / shortcomings in the plan. It is MCA's intention that wherever possible, disagreements should be resolved through correspondence or face-to-face discussions.

If a submitting authority objects to a direction made by MCA under regulation 4(6), on the grounds that any requirement of the direction is unnecessary or excessively onerous or inconvenient, it can write to the Secretary of State for the Environment, Transport and the Regions setting out the reasons for objecting. This must be done before the end of a period of 30 days, commencing from the date on which the direction was given. The Secretary of State will consider the reasons and may appoint a person to review the terms of the direction. He will then either confirm the direction as originally given, confirm it subject to one or more modifications, or cancel it.

MCA aims to issue a letter of approval within eight weeks of receipt of a contingency plan, subject to the need for discussion with the submitting authority and others as required.

In accordance with the regulations, all submitting authorities must notify MCA of changes to its plan, within three months of such changes occurring. Any changes which have a significant impact on the operational effectiveness of the plan will require the authority to review and revise the plan, consulting with the organisations described in these guidelines. The revised plan must then be submitted to MCA for approval. As the five year anniversary of a plan's approval approaches, the submitting authority must carry out a full review of the plan and submit a revised plan to MCA for approval.

26. Reference Material

NCP

The NCP developed by the Government in consultation with all interested parties, sets out the arrangements for dealing with pollution arising from spills of oil or other hazardous substances from ships into the marine environment.

The NCP is currently undergoing revision to take account of changes in legislation, lessons learned during SEA EMPRESS, local government reorganisation, and recommendations made by the SEA EMPRESS Environmental Evaluation Committee, Lord Donaldson and the Marine Accident Investigation Branch. The revised plan will also cover offshore installations. It is expected to be available in the autumn of 1998. The current version of the NCP is dated August 1996 and is available from MCA at the address on the cover of this guidance.

The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 (SI No 1056/98 ISBN 0-11-065937-6)

These regulations implement, in part, the OPRC Convention in the UK. Copies of the regulations can be ordered from the Stationery Office (telephone 0171 873 9090) or through most bookshops. They can also be found on the Stationery Office internet web pages in full text form (<http://www.hms.o.gov.uk/stat.htm>) under statutory instruments.

The Oil Pollution Preparedness, Response and Co-operation Convention 1990

Copies of the Convention can be obtained from the International Maritime Organisation (IMO), 4 Albert Embankment, London SE1 7SR (telephone 0171 735 7611), quoting IMO sales number IMO-550. The ISBN is 92-801-1267-8.

IMO Manual on Oil Pollution: Section II Contingency Planning

This publication provides useful background information on contingency planning, including general response planning considerations, local and area oil pollution emergency plans, national systems for preparedness and response, international agreements, and intervention and cost recovery. Copies are obtainable from the IMO at the address given above, quoting IMO sales number IMO-560E. The ISBN is 92-801-1330-5.

Directory of Spill Response Training Exercises

Information compiled on an annual basis (April to March) by the British Oil Spill Control Association (BOSCA) under contract to MCA contains details of exercises and training planned by local authorities, ports, harbours, oil companies and Government Departments/Agencies. Copies are available from Lisa Page at BOSCA, 4th Floor, 30 Great Guildford Street, London SE1 0HS, telephone 0171 928 9199, fax 0171 928 6599

Directory of Marine Spill Response Training Courses

Under contract to MCA, BOSCA compiles and updates an annual directory of marine spill-related training courses (January to December). Copies are available from BOSCA at the address above, or alternatively the information can be accessed from the MCA's web site (<http://www.shipping.detr.gov.uk/mca/mcahome.htm>).

UK National Oil Spill Response Training Standards

The Nautical Institute (NI) has been appointed by MCA to accredit oil spill response training courses which meet a nationally agreed training standard. Details of the training standard together with details of accredited training providers can be obtained from Margaret Chisholm at the NI, 202 Lambeth Road, London SE1 7LQ, telephone 0171 928 1351, fax 0171 401 2817.