BRITISH FORCES SOUTH ATLANTIC ISLANDS

EAST COVE PORT

MARINE SAFETY MANAGEMENT SYSTEM (MSMS)

(formerly Safety and Environmental Management System)

Strategic Command

Current Edition: **Version 7 – Effective: Jan 22**
Next Edition: Jan 23

Intentionally left blank for print pagination

OVERVIEW

1. This East Cove Port (ECP) Marine Safety Management System (MSMS) is a living document that will be regularly updated throughout the life of port operations. As such, hard copies remain uncontrolled. Responsibility for the maintenance of the ECP MSMS resides with the East Cove Queen's Harbour Master (QHM). The MSMS will be reviewed at least annually and as the result of any of the following:

a. Major organisational changes within the port;

b. Changes in IMO, MCA or Command policy;

c Changes in military or civil safety legislation;

d. Changes to the Port Marine Safety Code (PMSC);

e. Changes to current best practice;

f. In response to any significant incidents or accidents;

g. Experience gained from operating this MSMS.

2. **Disclaimer**. Nothing contained within this manual removes the responsibility of any Duty Holder (DH) to comply with the law and MOD requirements.

Prepared by:	*Commander J R Childs*	
Signature:	QHM – Harbour Master for AP *Signed electronically*	
Date:	*January 2022*	

Authorised by:	Commodore J Lett Royal Navy
	CBFSAI – Authorised Person
Signature:	*Signed electronically*
Date:	January 2022

Distribution:

Internal	External (edited)
CBFSAI	**Defence Maritime Regulator**
DComd	**Captain Port Operations**
Cmd Sec	
COS	**FIG Marine Office**
DCOS Ops	**Byron Marine Chief Pilot**
DCOS Spt	**Briggs Marine Ops Mngr**
OC ELW	**Van Wijngaarden Marine Services (Ops**
CO FIPV	**Mngr) BFSAI Tug Masters**
SO2 J3	**STRATCOM CESO**
MAR	**RN Safety Centre**
OC 460 Pt	
Tp	**https://www.gov.uk/government/groups/qhm-east-cove-port**
QF 460 Pt	
Tp	
OC NEFI	**Visiting Ships as reqd**

AMENDMENT RECORD SHEET

Issue Number	Date of Issue	Name
Original	Apr 17	Cdr Dawson RN
Version 2	Apr 18	Lt Cdr Stevens RN
Version 3	Mar 19	Captain Harris
Version 4	Mar 20	Captain Harris
Version 5	Dec 20	Cdr J R Childs RN
Version 6	Oct 21	Cdr J R Childs RN
Version 7	Jan 22	Cdr J R Childs RN

TABLE OF CONTENTS

CHAPTER 1: LEGISLATIVE, GOVERNANCE & REGULATORY FRAMEWORK

CHAPTER 2: POLICY & SETTING THE STANDARD

CHAPTER 3: ORGANISATION, ROLES & RESPONSIBILITIES

CHAPTER 4: RISK IDENTIFICATION AND MANAGEMENT

CHAPTER 5: PERSONNEL, TRAINING AND COMPETENCE

CHAPTER 6: EMERGENCY PREPAREDNESS & RESPONSE

CHAPTER 7: CONSERVANCY, ENVIRONMENT & CONSERVATION

CHAPTER 8: MANAGEMENT OF NAVIGATION

CHAPTER 9: PILOTAGE ARRANGEMENTS

CHAPTER 10: TOWAGE ARRANGEMENTS

CHAPTER 11: MARINE SERVICES

CHAPTER 12: INCIDENT REPORTING & INVESTIGATION

CHAPTER 13: QUALITY ASSURANCE & IMPROVEMENT

CHAPTER 14: RECORD & PUBLISH

CHAPTER 15: GLOSSARY

LIST OF FIGURES

LIST OF TABLES

LIST OF ANNEXES

Commander British Forces South Atlantic Islands' Foreword

As Commander British Forces South Atlantic Islands I am privileged to command a truly Joint Force which delivers operational capability every day of the year. I am constantly struck by the dedication, enthusiasm and professionalism of the 1200 Service personnel, civil servants who work here, far from the UK home base and in often arduous and challenging conditions.

As a military force our focus is on achieving Mission Success. This requires leadership, teamwork and personal responsibility, right down to the most junior member of my team. Operational capability and efficiency is paramount, but the most important factor is safety.

My intent is for the East Cove Port Marine Safety Management System to continue to mature and develop, maintaining the totality of the Marine Safety Hazards as tolerable, or As Low As Reasonably Practicable (ALARP). In turn, this approach will promote and encourage a culture of learning, as well as open and honest reporting. I absolutely embrace 'Just Culture'; genuine human errors will not be punished. Rather, we must learn from our mistakes, improving our systems and processes where required.

As a Permanent Joint Operating Base, BFSAI is a Duty Holder Facing Organisation and in the case of East Cove Port I hold particular responsibility as Duty Holder. We will ensure that we support the relevant personnel in the Duty Holding chain in their Risk to Life assessments through accurate hazard identification and the implementation of suitable controls. This applies as equally to the civilian ship operators as it does to our own military organisations. It is not always possible to eliminate hazards, but we must strive constantly to understand and assess the balance between risk and operational capability.

The success of the East Cove Port Marine Safety Management System depends upon clear communication and robust leadership. I demand that all commanders and managers inculcate Safety into their everyday business and working practices. Particular focus needs to be paid to personnel who have not operated in Maritime environment previously.

Marine Safety is central to the effective management of any port. I impress upon you all the importance of participating actively in Safety, whether on the water or working on land in port support operations. **EVERYONE HAS A VOICE.** Do not hesitate to report anything that you feel might, or indeed has compromised Safety. The BFSAI lead for Marine Safety is the Queen's Harbour Master.

Commodore
Commander British Forces South Atlantic Islands

INTRODUCTION

1. This Marine Safety Management System (MSMS) provides the framework for the safe operation of East Cove Port (ECP) in accordance with Commander British Forces Health, Safety and Environmental Protection Arrangements.[1]

2. ECP is the primary maritime logistics node for British Forces in the South Atlantic. The harbour is the operational base port for the Falkland Islands Patrol Vessel (FIPV), as well as visiting frigates or destroyers (FF/DD), submarines, the Ice Patrol Ship and Royal Fleet Auxiliary (RFA) when deployed to Atlantic Patrol Task (South). It also supports routine visits by British Antarctic Survey vessels, Falkland Island Government (FIG) and Government of South Georgia & the South Sandwich Islands (GSGSSI) vessels.

3. The port hosts five primary berths and a mooring pontoon for small craft:

Berth	Description
Main Jetty (MJ) 51°54'-07S - 58°26'-23W	A T-Shaped jetty projecting from the north face of East Cove; outer face concrete with rubber strakes and a chart datum of 8.1 m.
Main Jetty (Inner) 51°54'-07S - 58°26'-23W	This 30m berth is used by the Marine Services provider to berth the Multi-purpose barge and two harbour tugs.
RoRo Jetty (RoRo) 51°54'-07S - 58°26'-23W	The RoRo terminal comprises 6 mooring dolphins 40m apart, connected by walkways, extending West from the western extremity of the Main Jetty, but displaced to the North to allow stern ramp vessels to operate. Chart datum 8.6 m
West Jetty (WJ) 51°54'-04S - 58°26'-91W	A T-Shaped jetty 4 cables to the West of the Main Jetty. Primarily for the FIPV. Chart datum 7.8m.
Single Point Mooring (SPM) 51°54'-12S - 58°30'-12W	The SPM is a Catenary Anchor Leg Mooring (CALM) used for the receipt of bulk fuels from an ocean going tanker. Chart datum 11.0m The SPM is rated for a 35,000 ton vessel in a sustained 42kt wind.
Boat Pontoon	A floating pontoon linked to the shore by a walkway. The berth is to the north side of the Main Jetty and is used for berthing smaller RHIBs or Yachts. There is a VersaDock complex for the safe storage of RHIBs and RRC on the north face of the pontoon.

Table 1 – East Cove Port Berths & Moorings

[1] CBFSAI's HSEP O&A Statement dated 1 Dec 20.

4. **Maritime limits**. Environmental management is a fundamental part of the safe operation of the port. In common with the rest of the Falkland Islands, Mare Harbour and East Cove sit within an environmentally sensitive area with resident populations of penguins and other birds, visiting marine mammals including whales, dolphins and a wide range of other species. The port adjoins the RAMSAR[2] site of Bertha's Beach to the East of the Port, which is also an internationally recognised Important Bird Area (IBA). Figure 1 shows the general limits and disposition of the port.

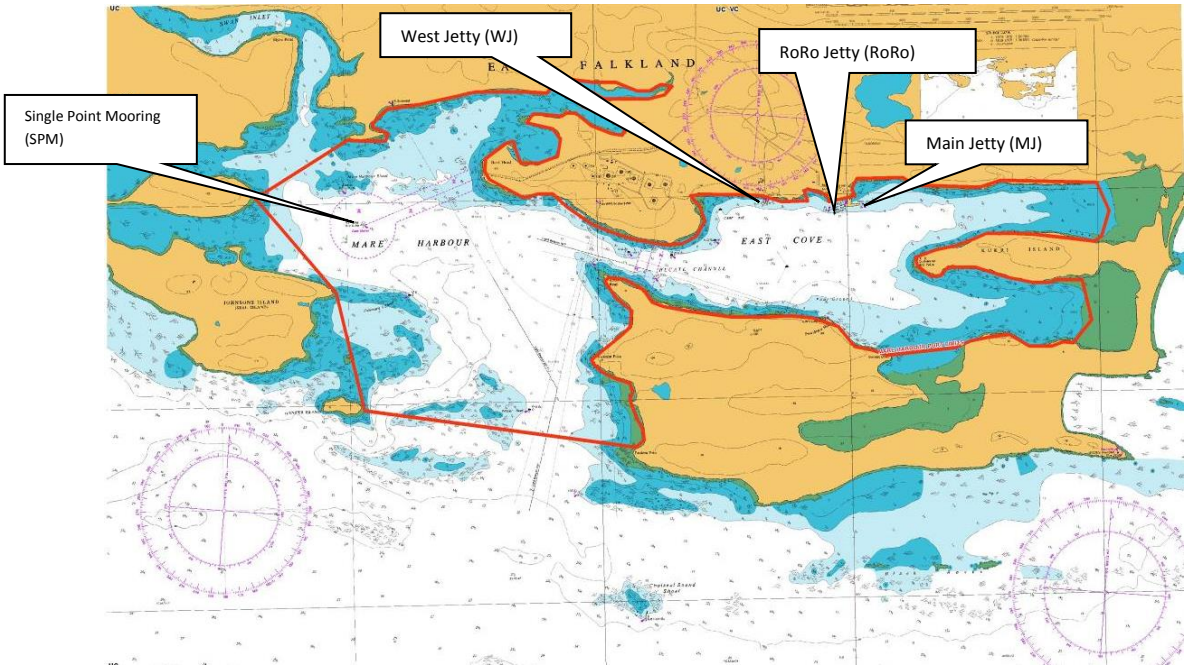

Figure 1 – East Cove Port – Maritime Limits

5. **Land limits**. The ECP area covered by the MSMS also includes the port hinterland: Container Park, warehousing, the Naval Engineering Falkland Islands (NEFI) compound and workshops.

6. **MSMS Construct**. The construct of the ECP Safety and Environmental Management System follows the guidelines laid out in the Port Marine Safety Code (PMSC) and associated Guide to Good Practice.

[2] RAMSAR is an international treaty for the conservation and sustainable use of wetlands.

CHAPTER 1 – LEGISLATIVE, GOVERNANCE & REGULATORY FRAMEWORK

PMSC: The Duty Holder must review and be aware of their existing powers based on local and national legislation, seeking additional powers if required to promote safe navigation….

1.1. Legislative framework. The legislative framework for ECP is as follows:

1.1.1 The **Naval Ports Ordinance** (18 of 1987). This ordinance was entered into Falkland Islands law on 18 Jan 88. It allows the Governor to declare and define the limits of a Naval Port and, on the advice of the Commander British Forces, appoint a Queen's Harbour Master (QHM). This ordinance vests QHM with the power to order, control, move and inspect vessels within the naval port, where necessary, recovering the costs from the owners. Should QHM require any additional powers he/she may seek them from the Governor.

1.1.2 **Mare Harbour (Declaration and Definition) Order** (SR&O No.9 of 1989). This defines the geographical limits of East Cove Port (ECP) as described in the introduction.

1.1.3 **Falklands Islands Law (FI Law)**. Falkland Islands law is broadly aligned to UK law, although only a small number of laws have formally been adopted and entered into statute. However, there will be elements of local legislation that will need to be considered by QHM in the safe operation of the port.[1]

The implications are that:

- **QHM must have a letter of appointment signed by the Governor to the Falkland Islands;**
- **QHM's authority extends only over those waters defined by the Mare Harbour Order; and,**
- **should QHM require additional powers they must be sought the Governor.**
- **QHM will from time to time need to seek advice from the Falklands Islands Government on the applicability of FI Law within the port area.**

1.2 Regulatory framework. The regulatory framework for the port is as follows:

1.2.1 For the **maritime element of ECP operations**:

1.2.1.1 **DSA02-DMR-MOD Ports and Harbours Regulations for Safety and Environmental Protection**. This has at its heart the Department for Transport's *Port Marine Safety Code* (PMSC)[2] as the authoritative articulation of best practice in port safety. Supported by:

[1] http://www.legislation.gov.uk/uksi/1997/2584/made/data.pdf

[2] Department for Transport's Port Marine Safety Code, updated Nov 16.

1.2.1.2 **DSA03-DMR-MOD Ports and Harbours Guidance on compliance** (when issued). In the interim, guidance should be sought from: *PMSC Guide to Good Practice (GTGP)*[3] and the *Dockyard Port Marine Safety Manual*.[4]

1.2.1.3 The **International Safety Guide for Oil Tankers and Terminals** (ISGOTT). This is a code of practice for the safe operation of oil tankers and terminals. The safe operating procedures for the single point mooring (SPM) are based on its guidance.

1.2.1.4 **Code of Safe Working Practices for Merchant Seafarers** (CSWP)[5]. This provides guidance on the management of occupational health and safety in seagoing vessels.

1.2.1.5 **British Tug Owners Association – Pre-towing tasks checklist**.[6] This provides a check list that should be used prior to the commencement of harbour related towing operations.

1.2.2 For the **land element of ECP operations**:

1.2.2.1 **UK Health and Safety at Work Act (HSAW)1974**; The Act defines the fundamental structure and authority for the encouragement, regulation and enforcement of workplace health, safety and welfare within the United Kingdom. As such, the Act forms the bedrock of Joint Force Health and Safety management on the Islands. Of note this act will apply to the maritime operations as well.

1.2.2.2 **HSE Approved Code of Practice: Safety in Docks (2014)**[7]. This covers Health and Safety aspects of operations ashore; Cargo handling; lifting operations; slips, trips and rescue from the water; transport by water; lighting; dusty cargoes; confined spaces; emergency planning; personal protective equipment; lone working; and, first aid. Its guidance is summarised in **HSE Leaflet INDG 446**[8] – A Quick Guide to Health and Safety in Ports.

1.2.2.3 The **International Maritime Dangerous Goods Code** (IMDG). This regulates the movement and handling of dangerous goods within ECP.

1.2.2.4 **JSP 482 –MOD Explosive Regulations**. This defines the military regulations that are to be applied to the movement and handling of explosives within the port.

The implications for ECP are that:

The MSMS and its Standard and Emergency Operating Procedures (SOP & EOPs), shall be reviewed regularly to ensure that they comply with the regulations, guidance and codes of practice above.

1.3 ECP Governance. The safety governance framework for ECP is as follows:

1.3.1 **Accountable Person (AP).** The AP for ECP is the Commander, British Forces South Atlantic Islands (CBFSAI). Within the construct of the PMSC, AP fulfils the function of Duty Holder for the port; in accordance with the BFSAI HSEP O&A.

[3] https://www.gov.uk/government/publications/a-guide-to-good-practice-on-port-marine-operations
[4] Port Marine Safety Code (2016)
[5] https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578413/CSWPMS_2016_collated_for_web_final.pdf
[6] https://britishtug.com/extras/best_guidance_practice_01.pdf
[7] http://www.hse.gov.uk/pubns/priced/l148.pdf
[8] http://www.hse.gov.uk/pubns/indg446.pdf

1.3.2 **Queen's Harbour Master (QHM).** The QHM is appointed by the AP to conduct day to day operations within the port and to ensure the port operates iaw all regulations. The AP, however, maintains accountability for compliance with the PMSC.

1.4 Governance Briefings & Meetings. Safety and environmental management of the port will be reviewed:

1.4.1 **Bi-annually**. At a formal meeting of the ECP Board, comprising of CBFSAI (Chair), COS/SNO, Theatre Health and Safety Officer (THSO), Theatre Environmental Protection Officer (TEPO), QHM, DQHM, OC 460 Port Troop (Secretary) and PSM.

1.4.2 **Annually**. An annual report on the port's performance will be published in April covering the previous financial year.

The implications for ECP are that:

- **The Accountable Person (AP) should be appointed with formal Letters of Authority detailing their responsibilities;**
- **The monthly and bi-annual safety and environmental governance meetings should be formally minuted and actions arising tracked until completion.**

CHAPTER 2 - POLICY & SETTING THE STANDARD

PMSC: Comply with the duties and powers under existing legislation as appropriate…

2.1 Policy. Commander British Forces South Atlantic Islands' **Mission** is:

to deter military aggression against the South Atlantic Overseas territories, in order to maintain UK sovereignty over dependent territories.

2.2 Role of Port. The contribution of the port as a component of CBF's mission is the **safe** and **efficient** operation of ECP as the primary Sea Port of Embarkation/Disembarkation (SPOE/D) for the Falkland Islands. This critical component for success delivery of this mission is achieved:

by ensuring the safe and efficient import and export of Petroleum Oils & Lubricants (POL), ammunition and cargo (civilian & military) and to support the maintenance of ships and submarines in the South Atlantic.

2.3 Delivery. QHM will deliver this by operating ECP in such a manner that:

2.3.1 it is **Safe** by:[1]

- conforming with the **legislation and regulatory framework** defined in Chapter 1;
- **minimising work-related fatalities, injuries and ill health** by those working within or adjacent to the port, by, so far as is reasonably practicable, by providing all personnel with safe facilities', equipment, systems of work, working environment and sufficient HS&EP information and training.
- **encouraging open and honest reporting of all accidents, near misses and failures of safety and environmental control.** Investigate these reports to understand the causes, identify and promulgate the lessons and, where appropriate take remedial action.
- encouraging the **promotion of an active HS&EP culture** through positive leadership and open communications across all levels of management.
- ensuring that **operational safety management** is instinctively considered and applied as inherent part of force protection.
- Implementing and maintaining a **robust and balanced Environmental Management System** that identifies the environmental effects of our activities, manage our compliance with legislation and promote continual improvement in our environmental performance. Particular emphasis is to be placed on the use of energy and water.
- Ensuring that **sustainable development considerations are embedded within spending and investment decisions**.
- Ensuring that **sustainability appraisals** and environmental impact assessments are undertaken as necessary.

[1] These sub-paragraphs are copied from CBFSAI's HSEP O&A statement.

- **Reducing Fire risks**. Each building is to have a Fire Risk Assessment, the contents of which are to be openly available to all personnel in that building.

2.3.2. and is **efficient** by ensuring that ECP:

- has sufficient resource, in terms of personnel, infrastructure and equipment, to deliver its role;

- that the supporting contracts: marine services (tugs & barges), pilotage and infrastructure maintenance, deliver the requirement and offer value for money to the MOD; and,

- that port regulations and directions are enforced as appropriate in accordance with the policy at Annex A.

2.4 Enforcement. ECP Enforcement Policy is at Annex A to this Chapter, below.

2.5 Performance Standard. The performance standard against these criteria is summarised at Annex B to this Chapter, below.

East Cove Port Enforcement Policy

Introduction

1. QHM's powers, defined in Falklands Islands Naval Port Ordinance, are broadly to:[1]

   a. order vessels within the port to specific anchorages or berths;

   b. board and search any vessel they suspect of carrying arms, explosives ammunitions or combustible materials or drugs contrary to the laws of the Falkland Islands;

   c. remove, destroy or take possession of any vessel or wreck which is a danger to navigation;

   d. seize and detain any vessel which has entered the Falkland Island territorial waters illegally.

Enforcement measures

2. Enforcement measures available to QHM comprise of:

   a. a written warning to the offender; and/or;

   b. prosecution via the Falkland Islands courts;

   c. UK Service Personnel may be subject to separate Service Law for contravention of orders.

Prosecution criteria

3. Legal advice will be sought prior to any prosecution and the following criteria will be considered in determining how to proceed. Prosecution will only be considered:

   a. when it is in the MoD, public or Governor's interest to prosecute; or,

   b. when other enforcement measures have failed;

   c. there is sufficient admissible and reliable evidence to provide a realistic prospect of conviction; and

   d. it is consistent with approach adopted elsewhere in the Falkland Islands.

4. If the decision is reached to prosecute then such action should be consistent, prompt and delivered in a fair and transparent manner.

Training

5. QHM should seek to 'table top tactic' Enforcement scenarios with Stanley Harbour Authority and interested parties once per annum.

[1] Reference should be made to the original Naval Ports Ordinance (18 of 1987).

East Cove Port Performance Standard

No	Title	Description	Standard	Evidence
1	**Legislative conformance**	conforming with the **legislation and regulatory framework** defined in Chapter 1;	Conform to legislation	L1, 2 & 3 Assurance
2	**Minimising work-related fatalities, injuries and ill health**	minimising work-related fatalities, injuries and ill health by those working within or adjacent to the port, by, so far as is reasonably practicable, providing all personnel with safe facilities, equipment, systems of work, working environment and sufficient HS&EP information and training.	0 deaths or RIDDOR injuries.	Incident and investigation records
3	**Incident, accident and near miss reporting**	**encourage open and honest reporting of all accidents, near misses and failures of safety and environmental control.** Investigate these reports to understand the causes, identify and promulgate the lessons and, where appropriate take remedial action.	Incident and accident reporting to conform to Bird's Triangle	Incident records annual report
4	**Promotion of an active HS&EP culture**	encourage the **promotion of an active HS&EP culture** through positive leadership and open communications across all levels of management.	Hold 12 port safety meetings/events pa	Meeting minutes
5	**Operational Safety Management**	ensure that **operational safety management** is instinctively considered and applied as inherent part of force protection.	Employ and maintain MSMS	MSMS, SOPs and EOPs, Training Record.
6	**Robust and balanced Environmental Management System**	Implement and maintain a **robust and balanced Environmental Management System** that identifies the environmental effects of our activities, manage our compliance with legislation and promote continual improvement in our environmental performance. Particular emphasis is to be placed on the use of energy and water.	Conform with OSCP; Conduct 1 x Tier 1+ exercises pa	Conducted prior to each Tanker and supervised by Briggs Marine iaw contract.

7	**Sustainable development considerations are embedded within spending and investment decisions**.	Ensure that **sustainable development considerations are embedded within spending and investment decisions**.	Support contracts reflect this aspiration	Support contract monitoring
8	**Sustainability appraisals and environmental impact assessments**	Ensure that **sustainability appraisals and environmental impact assessments** are undertaken as necessary.	Infrastructure projects all underpinned by appropriate SA/EIA process.	Infra SA/EIA
9	**Reduce Fire risks**	**Reduce fire risks**. Each building is to have a Fire Risk Assessment, the contents of which are to be openly available to all personnel in that building.	Each building has an up to date FRA	FRAs posted in each building on site
10	**Sufficient resource**	Has sufficient resource, in terms of personnel, infrastructure and equipment, to deliver its role;	Operational risks adequately mitigated. Port risks recorded accurately and mitigation action up to date.	Op Risk register
11	**Supporting contracts**	That the supporting contracts: marine services (tugs & barges), pilotage and infrastructure maintenance, deliver the requirement and offer value for money to the MOD; and,	Support contracts have completed approved MOD commercial process and performance actively monitored and non-conformance recorded and addressed.	Contract performance paperwork
12	**Enforcement**	That port regulations and directions are enforced as appropriate in accordance with the policy at Chapter 2 Annex A.	Enforcement actions are recorded.	Enforcement records

CHAPTER 3 – ORGANISATION, ROLES & RESPONSIBILITIES

PMSC: The Duty Holder is accountable for safe and efficient operations. Executive and operational responsibilities for marine safety must be clearly assigned, and a 'designated person' appointed to provide independent assurance of the effectiveness of the MSMS…

3.1 Organisation. In accordance with the Port Marine Safety Code (PMSC), the organisation for East Cove Port is as follows:

3.1.1. **Accountable Person (AP)**. The AP is the Commander, British Forces South Atlantic Islands (CBFSAI). The AP fulfils the function of a Chief Executive, or equivalent, in the port management structure in accordance with the PMSC Section 1.13. His responsibilities include:

- Overseeing the implementation of policies and decisions, specifically the requirements of the PMSC and the DSA02 regulations;[1]
- Maintaining overall executive responsibility for the safety of operations and staff.
- Appointing a "Designated Person" for the monitoring and effectiveness of the MSMS;

3.1.2. **Queen's Harbour Master (QHM)**. QHM undertakes the Harbour Master function in accordance with PMSC Section 1.14 and is responsible for the safe and efficient operation of the Port. A QHM with appropriate competence, experience and qualifications is appointed by Letter of Authority (LOA) from the AP in accordance with the PMSC Section 1.14 and also LOA from the Governor of the Falkland Islands under Falkland Islands statute law. QHM has day-to-day responsibility for the safe operation of navigation and other marine activities in the harbour and its approaches, including:

- Regulation of the time and manner of vessel movements;
- The provision and maintenance of Aids to Navigation (AtoN);
- The implementation of safe systems of work and standard operating procedures;
- Developing and implementing emergency plans and procedures, for regulating dangerous goods and cargoes, and for counter-pollution and waste plans.

3.1.3. **Designated Person (DP)**. Captain Port Operations is the Designated Person (DP) for the purpose of Dockyard Port Marine Safety and in accordance with the PMSC. His role is to provide independent Level 2 assurance to the Dockyard Ports Board that the operation of the Dockyard Ports' marine safety management systems meets the requirements of this policy. He will achieve this through a process of annual audit and assessment.

3.1.4. **Ports Board (PB)**. As discussed in Chapter 1 governance of this process is provided by the bi-annual Ports Board.

[1] The 10-key elements of the PMSC are that each port should have: a **Duty Holder**; a **Designated Person**; complies with **legislation**; complies with the **Duties and Powers**; that its operated under a **Risk Assessment**; using a **Marine Safety Management System**; is subject to **review and audit**; by **competent people**; using an agreed **safety plan**; with **navaids** that comply with General Lighthouse Authority regulations.

3.2 Roles & Responsibilities. Queen's Harbour Master (QHM) is supported by:

- **Port Service Manager (PSM)**. The PSM duties and responsibilities are wide ranging and extensive. They include but are not limited to:

    - Oversight of all aspects of logistic support to the Royal Navy, Royal Fleet Auxiliary ships, STUFT vessels and various DE&S departments.
    - Liaison with SO2 J3 Maritime to ensure that the operational programmes of Naval units in theatre are always provided with logistical support.
    - Raise requisitions on CP&F as required for the OSR and pilotage, then ensure payment has been made. To adhere to the budgetary responsibilities as laid down in the Letter of Financial Delegation issued to you by the QHM.
    - Co-ordinate and deconflict 'dry' activities within Port such as fuel, berth allocation and cargo ops.
    - Locally manage the Oil Spill Response Contract and SALMO contracts. Organise periodic SPM maintenance logistics. To ensure that, in the absence of DES CSS SALMO, Class moorings, marine navigation marks and associated equipment remain fit for purpose. To ensure that any reported defective equipment is reinstated to operational readiness.
    - Manage Tugs, representing at contractor meetings and assisting with crew swap logistics.
    - To monitor the transit of all RN, RFA, STUFT and contractor tug personnel to and from theatre, ensuring the necessary transport and accommodation is provided when ships are at sea.
    - Liaison and co-ordination of contracted services from Falkland Island companies.
    - Act as the Port's Explosives Safety Officer and Government Authorised Explosives Representative (GAER) to oversee the safe embarkation and disembarkation of explosives and ammunition.
    - Point of Contact for BAS and SGSSI.
    - Act as focal point for safety related issues.

- **Deputy Queen's Harbour Master** (DQHM). The role of DQHM is filled by SO2 J3 Mar, a Royal Navy Lieutenant Commander, Warfare Officer who deputises for QHM on a case by case basis as PSM is a non-mariner. DQHM maintains the Falkland Island Weekly Operational Programme (FINWOP) which is the authority for Marine activity.

- **460 (Port) Troop**. Led by a Captain, Royal Logistics Corps, the Troop provide and manage all aspects of the cargo handling and warehousing within the port. They also man harbour control.

- **Naval Engineering Falklands Islands (NEFI)**. NEFI led by a WO1 Engineering Technician, the team provides engineering and logistics support to the Naval Units operating in theatre. They have a mixture of trades that include engineering, supply chain and seaman specialists.

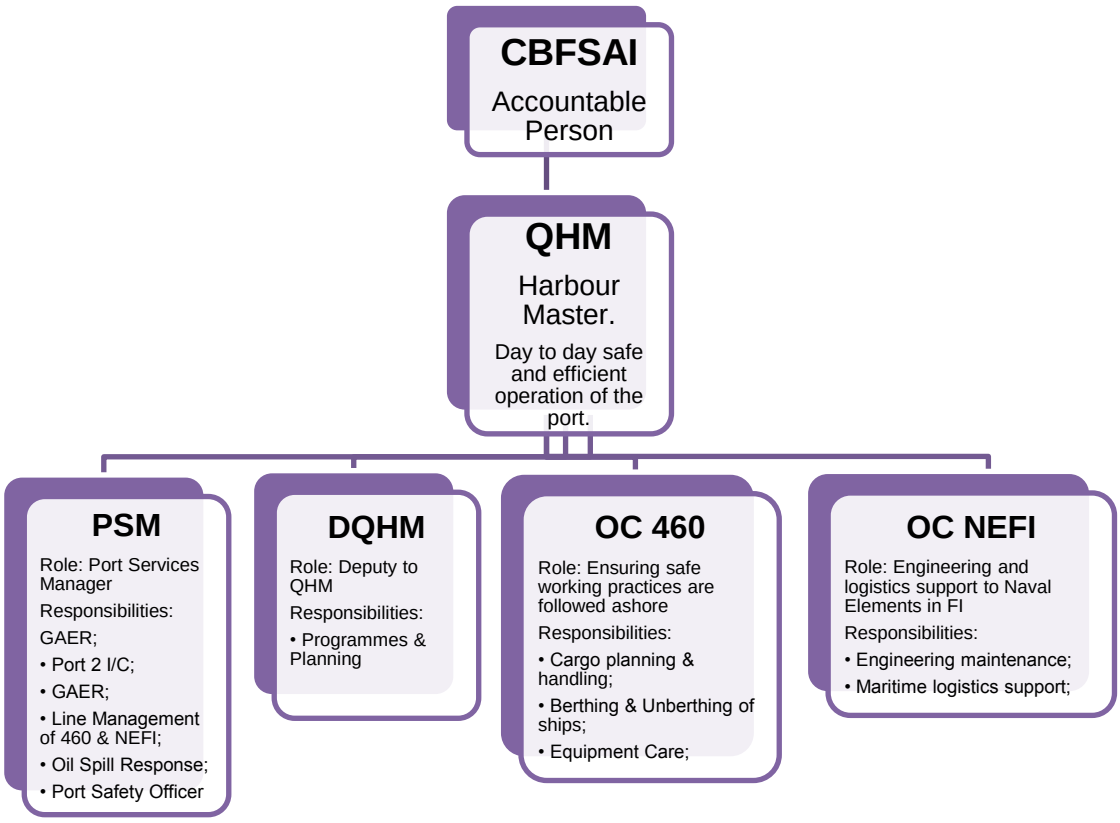

Figure 3 – Port Roles & Responsibilities

CHAPTER 4 – RISK IDENTIFICATION AND MANAGEMENT

PMSC: Ensure all marine risks are formally assessed and are eliminated or reduced As Low As Reasonably Practicable (ALARP) in accordance with good practice.

4.1 Introduction. The PMSC (Art 2.1) mandates a formal assessment of hazards and risks as the foundation of the Marine Safety Management System. The Navigation Risk Assessment (NRA)[1] fulfils that mandate by thoroughly researching the port operations as a means of understanding the prevalent hazards and attendant risks. This chapter of the MSMS articulates how Risk is managed on a day to day basis in the port and describes the process for review and transfer of risks through the PMSC duty holder chain. 'Wet' risks (ie waterborne) are managed through the MARNIS system, 'Dry' risks are managed through the main BFSAI risk register. 'Issues' (ie events which could become risks) are managed through an 'Actions and Issues' Log.

4.2 Definitions. This MSMS uses the clear distinction between hazard and risk:

- Hazard is something with the potential to cause harm, loss of injury;
- Risk is the combination of frequency of occurrence and consequence (outcome).

4.3 Stages. The MSMS follows the model of a 5-stage approach to the analysis:

4.3.1 **Problem Identification, Scoping and Understanding**. The NRA (Chapter 2) articulates a comprehensive overview of ECP operations, noting by section the key hazards to be considered when formulating the overall risk profile. NRA Chapter 3 develops an understanding of the routine port user community, identifies patterns of traffic use and the historic (as far as records allow) trends of significant accidents.

4.3.2 **Hazard Identification**. A comprehensive stakeholder-led assessment is the basis used to identify the hazards prevalent in the port, from which the ECP MARNIS register and Risk Register is populated. This tabulates the identified hazards across the port operation.

4.3.3 **Risk Analysis**. Within MARNIS/Risk Register the hazards are ranked by frequency and occurrence to give a clear picture of which risks are acceptable and require no action, those that are tolerable (As Low As Reasonably Practicable (ALARP)) and those which are intolerable and require further control or treatment. MARNIS/Risk Register details closely the control measures already in place, considers additional measures which may be invoked as resources allow, and signposts to the Risk Assessment (RA), Standard Operating Procedure (SOP) or Emergency Operating Procedure (EOP) which applies.

4.3.4 **Risk Control**. Where MARNIS/Risk Register indicates a score in excess of ALARP, measures are indicated by separate RA, which may be transferred across the Duty Holder chain as articulated below in Section 4.7.2.

4.3.5 **Risk Review**. The NRA will be reviewed by stakeholders on an annual basis. MARNIS/Risk Register will be reviewed by stakeholders following a change in process, design, legislation, infrastructure or operating patterns, otherwise periodic review is detailed in Section 4.7 below.

4.4 Reference Publications. ECP uses Joint Service Publication (JSP) 375 – The Management of Health and Safety in Defence – as the definitive policy and procedures for carrying

[1] British Forces South Atlantic Islands Navigation Risk Assessment dated Mar 20.

out Hazard Surveys and Risk Assessments. All port line managers and staff with SHEF responsibilities should be fully conversant with using JSP 375. Risk Assessments are recorded using MoD Form 5010 (Combined Hazard Survey and Risk Assessment).

4.5 MARNIS

4.5.1 **MARNIS**. Stakeholder consultation and regular review identifies hazards which are tabulated in the MARNIS Register. Having identified the prevalent hazards in the port, the MARNIS Register then assesses the risks by likelihood (frequency) and consequence (outcome). The scoring is done against **MOST LIKELY** consequence and **WORST CREDIBLE** outcome in the following four functional areas:

- **People** (Risk to Life);
- **Property** (Risk to fixed infrastructure);
- **Environment** (Risk of environmental damage or pollution);
- **Operations** (Risk that the operational output is damaged, to include reputational damage).

4.5.2 **Hazard Scoring**. MARNIS calculates scores automatically. From the Risk Register, for both frequency and consequence a scale of 1 (lowest) to 5 (highest / most severe) is used. Whilst the overall scores remain subjective, the assessment criteria and scoring panel are consistent which again mitigates against bias. Hazards are ranked by multiplying frequency and consequence to generate a risk score as follows:

- 1-5 Low Risk – No additional Control Measures required.
- 6-9 Medium Risk - additional Control Measures required;
- >9 Significant Risk – Activity not to take place without Control Measures.

4.5.3 **Hazard Ranking**. The Risk portfolio takes the average of the Most Likely and Worst Credible hazard scores to produce an overall risk value that can be ranked. Where additional controls are required, a bespoke Risk Assessment is produced.

4.6 Risk Assessments

4.6.1 **Assessing Risk**. ECP will produce written assessments for all significant hazards identified in the MARNIS/Risk Register, following the guidance within JSP 375 (Management of H&S in Defence) and JSP 892 (Risk Management). These formal Risk Assessments (RA) will be routinely reviewed to validate against continued risk, to reflect best practice across the marine industry, and as a means to assure that every effort is being made to keep inherent risks As Low As Reasonably Practicable (ALARP). These formal risk assessments shall be used to:

- Analyse risks identified through the Hazard Log and;
- Assess those risks against the appropriate standard of acceptability;
- Impose control measures where necessary to reduce the risk ALARP;
- Where appropriate, consider a cost-benefit assessment of risk removal measures;

4.6.2 **Significant Risks.** Significant risks are identified by those activities that attract a hazard score of 9 or more. These risks must be mitigated by the implementation of specific

control measures, otherwise the activity will not be permitted. If for any reason the RA identifies a control measure that is not effective the activity is to cease until suitable control measures are in place and the risk mitigated to a score as low as reasonably practicable**.**

4.6.3 **Risk Controls.** The safety controls for the risks identified are reviewed and amended where necessary, as articulated in Section 4.7, and using the hierarchy of risk control:

- Minimise Risks through suitable systems of working (SOPs);
- Combat Risks through application of control measures (RAs);
- Eliminate Risks wherever possible either by avoiding the hazardous procedure or breaking it down into less dangerous ones.

4.6.4 **Risk Assessments - Routine**. The ECP routine or standing Risk Assessments are lodged within the BFSAI Safety, Health & Environmental Protection database and reviewed as described in Section 4.7.

4.6.5 **Risk Assessments – Higher Level**. Higher level Risk Assessments are those where the level of risk exceeds that which can be held within the delegated authority of QHM and is transferred up the duty holder chain, or where the treatment of the risk requires higher level visibility in order to attract funding. The CBFSAI as AP owns these risks and QHM manages them.

4.7 Risk Reporting, Review and Transfer

4.7.1 **Risk Review**. ‘Wet’ and ’Dry’ Risks are reviewed separately as follows:

- **‘Dry’ Risks (ie held on BFSAI Risk Registers). Current numbers allow for all hazards, risks and issues to be discussed:**

- Monthly as part of the Port Safety Meeting;
- By stakeholders on a 6-monthly basis as part of the BFSAI Risk & Performance Forum (see Section 4.7.2);
- By stakeholders following a change in process, design, legislation, infrastructure or operating patterns;
- Annually as part of the NRA review process;
- Post incident or accident;
- Post review of any relevant marine accident or health check trend report (MCA/MAIB).
- As part of the Level 2 and Level 3 Assurance Process by Captain Port Operations (as Designated Person) or the Defence Safety Authority (Defence Maritime Regulator).

- **‘Wet’ Risks (ie held on MARNIS). Approximately 8 risks will be reviewed each month to ensure a rolling process:**

- Monthly as part of the Port Safety Meeting;
- Stakeholders to include Tug Masters and Chief Pilot, CO FIPV (or deputy) and NEFI Coxn;
- By stakeholders following a change in process, design, legislation, infrastructure or operating patterns;
- Annually as part of the NRA review process;
- Post incident or accident;
- Post review of any relevant marine accident or health check trend report (MCA/MAIB).
- As part of the Level 2 and Level 3 Assurance Process by Captain Port Operations (as Designated Person) or the Defence Safety Authority (Defence Maritime Regulator).

4.7.2 **Risk & Performance Forum**. ECP is represented by QHM at the BFSAI Risk and Performance Forum (RPF) which meets 6 monthly.

4.7.2.1 The RPF is the senior forum for risk management and performance levels across BFSAI; it provides the means by which the senior Risk Owners (CBFSAI and his DComd) are given an overview of the risks held across BFSAI, using a framework of Risk Register owners and the Business Manager to support and monitor the performance of delivery against Key Performance Indicators (KPIs).

4.7.2.2 The RPF will also provide governance of risk registers and the escalation or transfer of risk, whilst identifying risk opportunities and planning for risk in the future.

4.7.3 **Risk Transfer**. The RPF is the routine mechanism by which ECP risks are reviewed for transfer from QHM to Accountable Person (CBFSAI). However, unusual or arising risks may be assessed and transferred at any time appropriate through negotiation between QHM and CBFSAI.

4.7.4 **Risk Reporting**. Due to operating tempo, the ECP risk portfolio is briefed to the CBFSAI only when a change occurs. This could be verbally or through a formal Report to the Accountable Person. Key risks and the overall risk barometer are reported to higher authority in accordance with the required Battle Rhythm[2].

4.8 Consultation

4.8.1 **Consultation**. Consultation with harbour users is vital through stakeholder group meetings related to the subject at hand (i.e. hazard review, safety management, equipment care). Feedback from these groups is minuted, recorded for action where appropriate, and reported in the Annual Report where necessary.

4.8.2 **Consultation Process**. To ensure that ECP has strong and direct links with harbour users, local communities and other external organisations with an interest in the port, a formal consultation mechanism was established in 2017. Consultation is a continuous and wide-ranging process. It should include regular meetings with internal and external agencies including, but not limited to:

Dockyard Ports Board;
Captain, Port Operations;
STRATCOM (through HQ BFSAI);
HQ BFSAI;
HMS FORTH (FIPV)
Falkland Islands Government (FIG)
Government of South Georgia & The South Sandwich Islands (GSGSSI)
Byron Marine (Owner / Operator of MV PHAROS SG – the GSGSSI Patrol Ship)
Falklands Conservation
South Atlantic Environment Research Institute (SAERI)
The Hydrographic Office
The Meteorological Office
The Defence Infrastructure Organisation (DIO)
Defence Equipment & Support (DE&S) – Salvage & Marine Project Team
Mitie
Van Wijngaarden Marine Services b.v (Owner / Operator of Tugs & Support Barge)

[2] At time of writing, STRATCOM are in the process of establishing a periodic meeting of PJOB maritime authorities, and the Capt Port Ops led Dockyard Ports Advisory Board is in abeyance.

CHAPTER 5 – PERSONNEL, TRAINING AND COMPETENCE

PMSC: Use competent people (who are trained, qualified and experienced) in positions of responsibility for managing marine and navigation safety.

5.1 Summary. This chapter describes how those personnel working within ECP and involved with the safety of navigation, marine or port operations are qualified and competent to do the job[3]. It will outline:

- Competence - how National Occupational Standards (NOS) are translated into military equivalence;
- Appointment & Qualifications for Queen's Harbour Master;
- Qualification and Authorisation of Pilots;
- Marine Services Contracts (Tug crews);
- Operation of small boats (RHIBs);
- Local Port Service (LPS) Operators;
- Training and Continuous Personal Development.

5.2 Recruitment - STRATCOM recruits suitably qualified civilian staff to fill the roles set out in the organisation plan; military positions are filled through routine post rotation to meet Suitable Qualification and Experience (SQE) protocols. Failure to meet the SQE requirements will be reported as shortfalls to the manning authorities through the Recognised People Picture (RPP).

5.3 Competence Standards. ECP is responsible for assuring the fitness and competence of all persons appointed to positions with responsibility for safe navigation, safe operation of land or marine systems (including boats) or administration of the Local Port Service.

5.3.1 **Military Competence**. Port personnel[4] are deployed by military manning authorities based on being "Suitably Qualified and Experienced Personnel" (SQEP) to meet the requirements of the job descriptions. All personnel undergo a comprehensive Induction Process that identifies their core competence and experience, then mandates a local familiarisation process to assure that each individual is prepared and confident to undertake their duties and responsibilities.

5.3.2 **Civilian Competence**. Civil Service posts are advertised against the "Core Competence Standards" appropriate for the post skills required. Any competence shortfalls will be agreed at the recruiting stage and a programme of mitigations and training put in place as appropriate.

5.3.3 **Competence Appraisal**. Job description, performance and training requirements are reviewed on joining and on leaving, and at the mid-tour point. Personnel are then appraised annually or at the end of their tour. Reports on port staff are held in confidential personnel files within electronic Human Resource (HR) systems (JPA and MyHR).

5.4 Queen's Harbour Master. The Queen's Harbour Master is a statutory appointment as articulated in Chapter 1, with formal letter of appointment by His/Her Excellency the Governor and 'gazetting' under Falkland Islands law.

[3] See also document '20211126-ECP_SQEP_Tracker_QHM-PSM-O'.

[4] Chief of Staff as Senior Naval Officer (and alternate QHM), SO2 Maritime, 460 Port Troop, NEFI.

5.4.1 **QHM Qualifications**. As a minimum the QHM requires the following qualifications to be considered the baseline SQEP for the role:

- STCW 95/II-2 – Master (or RN STCW Commanding Officer equivalent); or
- A MCA / UKHMA accredited programme of HM training;
- UKHMA Membership;
- A commitment to a programme of Continuous Professional Development (CPD) such as the UKHMA / Port Safety & Skills (PSS) Harbour Master Certificate (which follows the NOS requirements), or the Lloyds / IBC Academy Diploma for Harbour Masters.
- MCA Level 4/5 Oil Spill Response Management training.

5.5 Deputy Queen's Harbour Master. As far as is reasonably practicable the DQHM incumbent should meet STCW 95/II-2 Mate / OOW standards and have undergone HM and OSR training.

5.6 Port Services Manager. The Port Services Manager will ordinarily be a Civil Service Grade C2 position, with an aspiration that this will evolve to a Marine Services Officer (MSO) Grade 2 or be part of a port commercialisation programme evolving through the 2020s. Potentially, the PSM roles may be folded into the QHM role. Aspirational qualifications (but not mandatory) are:

- STCW 95/II-2 Mate / OOW;
- MCA OSR Level 4;
- Government Authorised Ammunition Representative (GAER) (Essential);
- Health & Safety Practitioners qualification recognised under the NOS framework (such as NEBOSH / IOSH);
- Dangerous Goods and Container Stuffing accreditation.

5.7 Pilots. QHM is solely responsible for the authorisation and licencing of Pilots to operate within the port limits of ECP. A Pilotage service is contracted with a requirement to provide a minimum of three Pilots, of which one may be under training. It is the responsibility of the Company to present a candidate for licencing as a Pilot: QHM will determine their suitability.

5.7.1 **Pilot Qualifications**. Pilots may be licenced at ECP on the basis of the following qualifications:

- STCW 95/II-2 Masters Qualification with a classification appropriate to the size and class of vessels to be Piloted;
- Demonstrable competence, currency and experience;
- Physical fitness, Current ENG1 seafarer's medical certificate;
- Local knowledge examination of regulations and port;
- Commitment to CPD, including maintenance of currency in relevant skills such as Electronic Navigation Systems (ECDIS).

5.7.2 **Pilot Assessment**. Pilot standards and procedures include the following stages before authorisation.

- Assessment of documentary evidence of qualification and experience;
- An agreed period of understudy with the Chief Pilot relevant to previous experience and currency, to include recorded trips by day and night on all classes of routine traffic visiting ECP;
- An agreed number of trips in the tugs during complex attached moves (such as FIRS or Tanker) to enable full understanding of the capabilities and limitations of the tugs;
- A recorded number of trips where tug control has been exercised;

- An interview Board/examination comprising QHM, Chief Pilot and a third member (DP wherever possible);
- A qualifying trip or trips witnessed by QHM.

Following successful assessment, a time or class limited licence will be issued by QHM.

5.7.3 **Pilot Records**. Pilots are to maintain comprehensive records of their trips, to include Pilotage Cards. Completed Pilotage Cards are to be retained by pilots and submitted to QHM on request.

5.7.4 **Pilot Re-Validation**. Pilots will revalidate their CoCs every 5 years. QHM will accompany each Pilot for an entry and exit at least every 6 months to meet appraisal and contract monitoring requirements. An assessment of the quality and delivery of the Pilotage service will be included in the Annual Report.

5.8 Marine Services Contract. The Provision of Falkland Island Marine Services (FIMS) contract S&MOCB/3369 provides 2 Anchor Handling Tugs (AHTs) and a Multipurpose Barge owned and operated by Van Wijngaarden Marine Services under a Baltic and International Maritime Council (BIMCO) Supplytime 2017 Charter Party (CP) administered by Defence Equipment & Support (DE&S) Salvage and Marine Operations (SALMO) Project Team.

5.8.1 **Suitability for Purpose**. The ECP MS contract was awarded following extensive contract definition and competitive tender. The BIMCO contract lays a duty of provision on VWG for the delivery of craft which are recognised and regulated under a Classification Society (in this case Bureau Veritas) and personnel who are Suitably Qualified and Experienced for the posts they hold.

5.8.2 **Contract Monitoring**. DE&S SALMO hold the formal responsibility for contract monitoring, however this is a distant function which primarily assures that the legal aspects of the agreement are being fulfilled in delivery terms. On a day-to-day basis QHM is responsible for assuring that the tug Masters are delivering a safe and effective service. This assurance is provided as follows:

- Monthly reports and returns from the vessels;
- Reports from the Pilots;
- Feedback from ships the tugs have attended;
- Sight of vessel training and maintenance records, as appropriate.

In 2017 VWG adopted an International Safety Management (ISM) accredited Safety Management System (SMS) which will be available to QHM to further support Quality Assurance of the contract.

5.8.3 **Tug Training & Certification**. As a Dutch company, VWG are not bound to follow the British Tug Owners Association training best practice regime. However the company has applied industry best practice wherever practicable, and all crews meet the best of IMO licencing and certification regimes appropriate to the size and role of the craft to their national (Dutch) standards. These certificates are sighted annually by SALMO during contract assurance visits.

5.9 Competence and Training for Small Boats. Personnel whose duties require them to operate RHIBs in the port areas require a minimum qualification of RYA Powerboat Level 2, or for the dive RHIB, BSAC Diver Cox'n. All military cox'ns of resident boats (service or welfare provided) will require licences to be endorsed by QHM in accordance with service boat regulations before taking a boat on the water. For visiting warships, the internal endorsement process conducted by the ship's Executive Officer is acceptable; however visiting cox'ns will be required to attend a

briefing by QHM before operating in the port. Small boat operating limitations are issued in QHM Directions.

5.10 Local Port Service (LPS). ECP is only able to provide a LPS for which no formal training or qualification is provided. This is an acknowledged weakness that is captured in the Navigation Risk Assessment, Hazard Log, and Risk Assessment. LPS operators will undertake formal VHF training before deploying, and induction training on arrival.

5.10.1 **LPS Training**. In lieu of any formal, funded training the following training is provided for LPS operators:

- **Induction Training**. This captures the full responsibilities for the East Cove Port Ops Controller (ECPOC) and duty personnel who operate the harbour radios out of hours;
- **Comprehensive Crib Sheets**. Example radio calls and responses are provided at the operators desk adjacent to the radio to cover most routine events;
- **On Job Training (OJT)**. Informal OJT is provided by QHM on an opportunity basis, largely through monitoring radio traffic and operator performance during the working day.

5.10.2 **LPS Response**. LPS operators have access to a comprehensive set of SOPs, EOPs and “How To” guides to assist them in making the correct responses to incidents as they arise, together with call-out details for all duty personnel and emergency services.

5.11 Training. It is recognised that the successful implementation of the ECP MSMS can only be achieved through a policy of continuous training, with regular reviews of specific training requirements.

5.11.1 **Professional Training**. Military personnel are trained externally to achieve the requisite level prior to arrival for their tour; civilian personnel are recruited having the appropriate qualifications. ECP Managers have a burden of duty to assure all members of staff are qualified to operate the many items of equipment, such as cranes or specialist vehicles or equipment, used in the daily operation of the port. This may include re-validation of these qualifications. Training is seen as continuous to meet the ever-increasing demands made on the port.

5.11.2 **Continuation Training**. Continuation training will be undertaken where appropriate by all members of staff in order to provide and maintain a safe level of service delivery. Training will be routinely provided in accordance with the Training Matrix, with the primary focus being the reinforcement of safety procedures.

5.11.3 **Safety Training**. Safety training is regarded as an indispensable ingredient of an effective SMS and programme as it is with health and safety matters. It is essential that all involved in the safe management and operation of the port are trained to perform their operations safely. Regular familiarisation and reinforcement training will be conducted and recorded for all staff and recorded in the Training Matrix.

5.11.4 **On Job Training (OJT)**. The importance of ‘on the job’ training in the workplace should not be underestimated as it forms an invaluable part of the overall training requirement. All port personnel in positions of leadership or supervision, of whatever rank or rate, have a responsibility for the training, mentoring and coaching of their teams through the passing on of their own experience.

5.11.5 **Induction Training** – Induction Training will be conducted by all personnel on joining. As part of the induction training, MSMS will be read and signed for by the following personnel:

- QHM
- DQHM
- PSM
- All 460 Troop personnel
- All Tug Crews
- Pilots
- NEFI personnel

5.12 Team Briefing. Regular team briefs are held to ensure good communications and quality, both in service and in adhering to the SMS. “Tool Box Talks” are to be conducted prior to any evolution (berthing, fuelling, diving etc).

5.13 Training Records. A record is kept of all training and assessment through the Training Matrix. In spread sheet format it also provides the vehicle for the forward planning of training opportunities, as well as evidence of training activity for Level 1 and Level 2 assurance regimes.

CHAPTER 6: EMERGENCY PREPAREDNESS & RESPONSE

PMSC: … the Safety Management System should make preparations for emergencies – and these should be developed, implemented, maintained, operated effectively and revised periodically.

6.1 Emergency Preparedness – Higher Level Plans

6.1.1 Although the MOD has exemption under the Control of Major Accident Hazard (COMAH) Regulations 1999, (issued under the Health and Safety at Work Act 1974), in line with the Secretary of State for Defence's policy the MOD has decided that similar standards to those required by COMAH will be applied across the Department. To achieve this objective, the MOD has established a Competent Authority (CA) to oversee the introduction and monitoring of its own Major Accident Control Regulations (MACR).

6.1.2 To meet the commitment to the MACR regulations, BFSAI has issued a Major Accident Prevention Policy (MAPP) which also governs ECP. The MAPP is derived from the guidance in JSP 498 to counter the hazards identified in the MACR database maintained by the Theatre Environmental Protection Officer (TEPO).

6.1.3 From the hazards identified in the MACR database, BFSAI maintains a Major Incident Plan (MIP). This is the lead reference document to initiate a response to a major incident and for subsequent command and control actions. It is designed to be used in conjunction with Unit Emergency Operating Procedures (EOPs).

6.2 Civil Contingencies Act and Falklands Legislation

6.2.1 The Civil Contingencies Act (CCA) (2004) provides the single framework for civil protection and preparedness within the UK, under which ECP would have been a Category 2 (Utilities, Transport, Health and Safety) responder as a Competent Harbour Authority. However, the CCA has not been adopted into Falkland Islands legislation so is not directly applicable. ECP will adopt the principles and guidance of the CCA as far as is reasonably practicable within local limitations in recognition of its status as acknowledged best practice.

6.2.2 Should the Falkland Islands Government adopt the CCA or an abridged version at some point in the future the ECP MSMS will be adapted to incorporate relevant changes.

6.2.3 Falkland Islands legislation is not mature enough to incorporate a full National Contingency Plan (NCP). However, as a UK Overseas Territory (UKOT) in the event of a major catastrophe the SOSREP[1] would be informed through the FCO to enable deeper specialist support and funding.

6.2.4 **Other Authorities**. ECP maintains close links with Stanley Harbour Authority, the commercially run FIPASS port facility at Stanley, the Falklands Marine Officer and the Environment Officer. Stanley also holds a quantity of OSR equipment and has MCA Level 4 responders; the adjacent Port Authorities liaise closely to ensure mutual support in the event of a major incident. Contact and reporting details are contained within the OSCP.

[1] Secretary of State's Representative – a Senior Civil Servant responsible for co-ordinating responses to maritime incidents.

6.3 Oil Spill Response (OSR).

6.3.1 **ECP OSR Policy**. ECP will apply, as far as reasonably practicable in the operation and use of the port, the legislation and guidance for marine and port operations laid down by, but not limited to:

The International Maritime Organisation (IMO);
The International Ship and Port Facility Security Code (ISPS);
The UK Marine and Coastguard Agency (MCA);
The Marine Accident Investigation Branch (MAIB);
The Safety of Life at Sea (SOLAS) convention;
The International Maritime Dangerous Goods Code (IMDG);
The International Safety Guide for Oil Tankers and Terminals (ISGOTT);
The Major Accident Control regulations (MACR).

6.3.2 **Marine Pollution Risks**. ECP is committed to provision of an Oil Spill Response capability for a Tier 1+ spill. The following marine pollution risks are present at ECP:

- The Single Point Mooring (SPM) in Mare Harbour. This is used primarily for the bulk receipt of marine diesel (F76) and aviation fuel (F34).
- Vessels refuelling alongside from a road tanker;
- The Multi-Purpose Barge and harbour tugs refuelling alongside the Main Jetty or West Jetty from road tanker;
- Bunkers transfers between a harbour tug and visiting vessels at anchor in either Mare Harbour or East Cove;
- Storage of oils and lubricants in the Port area;
- Spills from bulk storage areas.
- Refuelling ops at remote sites. These operations are within the scope of the OSCP.
- Some visiting vessels may use heavy fuel oil (HFO) for their own propulsion, but this is not transferred at ECP. However, in the event of a catastrophic collision or grounding there is a risk that such product may be spilled.

6.3.3 **OSR Contract**. ECP has a contract with a commercial company to deliver a holistic OSR capability, which includes:

- Sufficient and appropriate Oil Spill Response equipment for a Tier 1+ marine pollution incident within the specified limits of ECP, owned by the contractor, and replaced as required to maintain serviceability and availability, and to meet standards of best industry practice and techniques;
- Maintenance of all provided equipment on a regular basis;

- A complete outfit of Personal Protective Equipment (PPE) sufficient to sustain personnel dealing with a Tier 1+ incident, held at readiness within the port area and replaced as required in accordance with shelf life;

- Sufficient consumable response stores (absorbent materials etc) to allow response to a Tier 1+ level incident;

- Suitably qualified OSR professionals to attend ocean tanker discharge events at ECP (typically 2-3 times per year);

- Deliver training in theatre for BFSAI personnel at up to 4 times per year (coinciding with ocean tanker delivery cycle) to include MCA accredited Level 1 & 2 for tug crews, port and fuels organisation personnel, and up to Level 4 for port management teams. A report of training conducted is provided to QHM within 14 days of each training event;

- Author and review of the ECP Oil Spill Contingency Plan (OSCP);

- On call mobilisation of personnel to attend and support a major spill event within 48 hours;

- Provision of an appropriate deployable spill containment pack in support of fuel transfer operations on West Falkland.

6.3.4 **Oil Spill Contingency Plan (OSCP)**. ECP has contracted Briggs Environmental as a specialist Oil Spill Response Company to produce a comprehensive OSCP for the port following detailed environmental analysis. Whilst the scale of operation and type of product handled only mandates a capability to respond to a Tier 1 level incident, ECP has adopted a policy of preparedness for a Tier 1+ incident to take into account the remote location and time delay for activating additional support.

6.3.4.1 The full **Oil Spill Contingency Plan** includes an environmental assessment of the likelihood and consequence of any pollution within the port limits. Annexes to the plan cover operations on West Falkland.

6.3.4.2 **OSCP Training**. OSCP training is scheduled to coincide with specialist responders and trainers attending during an ocean discharge event with the Ocean Tanker (usually MAERSK RAPIER). Major spill responses are rehearsed periodically as part of the wider BFSAI MIP training regime, and are subject to 3-yearly Level 3 Assurance from the MACR Competent Authority.

6.3.5 **Unit Spill Response Plan (USRP)**. The Unit Spill Response Plan provides the detailed instructions for dealing with a spill on the land and is fully complementary to the OSCP. It gives comprehensive instructions to all personnel involved in the Command, Control or Response to a spill incident involving petroleum based products. Chemical spills are covered under separate plans.

6.3.5.1 Immediate reaction crib sheets are available to the Duty East Cove Port Ops Controller (ECPOC).

6.3.6 **Emergency Operating Procedure (EOP)**. The immediate reactions to a spill incident are also covered in a port EOP. This is the first link in a chain which will escalate as far as a full theatre Major Incident if required.

6.4 Explosives

6.4.1 **Policy**. Handling of explosives at ECP is governed by JSP 482 (MoD Explosives Regulations), and JSP 862 (MoD Maritime Explosive Regulations) and JSP 800 Vol 4b (Dangerous Goods by Road, Rail and Sea).

6.4.2 **Explosives Safety Officer**. The Port Services Manager (PSM) is the Explosives Safety Officer (ESO) and Government Authorised Explosives Representative (GAER) for the port.

6.4.3 **Explosives Licence**. ECP is licenced by the Inspector of Explosives (Army). The explosives licence for the port is reviewed every 5 years. The GAER is responsible for assuring that the limits imposed by the licence are strictly adhered to. The Licence was last validated Jun 2020 and due renewal by 23 Jun 2025.

6.4.4 **Standard Operating Procedure (SOP) and Emergency Operating Procedure (EOP)**. BFSAI has both a SOP and EOP for handling explosives and ammunitions and in the event of an ammunition or explosives incident in the port. Is highly likely any explosives incident would be escalated to a full theatre major incident.

6.5 Dangerous Substances

6.5.1 **Policy**. As with other legislation, the Dangerous Substances in Harbour Area Regulations 1987 (DSHAR) have not been adopted into Falkland Islands law. However ECP will apply the legislation as far as reasonably practicable as definitive application of best practice.

6.5.2 **Regulation of Dangerous Substances**. Visiting ships are required to notify ECP if they are carrying or intend to work dangerous substances during calls to the Port. QHM retains the right to refuse entry, or cargo working, for any vessel which fails to provide adequate notice of intent. ECP stores a minimal quantity of dangerous substances commensurate with routine port operations; these are all stored in accordance with COSHH regulations in a caged, locked and bonded area. Ships are expected to fulfil the requirements of the IMDG Code, Merchant Shipping (Dangerous Goods and Marine Pollutants) Regulations, and the MARPOL Convention.

6.5.3 **BFSAI Regulations**. The BFSAI regulations for the handling of dangerous substances are contained within the Safety, Health & Environment Manual.

6.6 Fumigants.

6.6.1 All ships are required to notify ECP in accordance with IMO recommendations if they are carrying cargo which has been fumigated with pesticides. The Consignor should also have notified the Consignee if cargo containers have been sealed with fumigants active.

6.6.2 If containers are to be opened within ECP that have been fumigated prior to shipping they will be placed in a clear area away from working personnel or buildings prior to opening. Once opened they will be vented in accordance with the product hazard sheets.

6.7 Dangerous Vessels.

6.7.1 **Policy**. Any vessel that has excessive list or trim will not be permitted until QHM is content that the vessel cannot restrict the navigable channel. Dangerous cargoes when on routine manifests are managed appropriately. Other vessels are managed on a case by

case basis once all the facts are known. Note pilotage is compulsory and a mitigation against any unsafe or dangerous vessel or cargo entering ECP.

6.7.2 **Application**. QHM reserves the right to refuse entry to, or to direct the removal of a dangerous vessel if in his view its presence in the harbour may constitute a grave or imminent danger to persons, property or the safe continued use of the port.

6.7.3 **Exception**. QHM remains cognizant of the rights of the SOSREP, or locally the Governor of the Falkland Islands to override the decision of the QHM if it is in the national interest to do so (for example to prevent a greater catastrophe elsewhere).

6.8 Liaison with Emergency Services

6.8.1 **Policy**. As a military port, ECP is covered by BFSAI service police and fire response assets from Mount Pleasant Complex (MPC). Every reasonable assistance will be rendered by port personnel to the emergency services in the conduct of their duties in responding to incidents. However, QHM retains responsibility for safety of life within the port areas and reserves the right to intervene, direct or control any activity where QHM deems there is a conflict due to a lack of specialist maritime knowledge by land based emergency services.

6.8.2 **Local Command**. Once a Bronze or Silver Command post is established either at the scene of the incident, or in Port Ops, QHM may either assume the role of Bronze or Silver Commander from the first responder, or act as SME within the local command post.

6.8.3 **Falkland Island Responders**. Unless there is a military or operational imperative, civilian police or fire services will always retain the right to access at ECP.

6.8.4 **Training**. Every opportunity will be taken to train with local police, fire and medical services – military and civilian – to enable an effective response to incidents within ECP. Such training will be documented within the training documentation for the port. Visiting warships should expect to conduct a harbour fire exercise with the BFSAI fire service, to include a medical response, within their first week of arrival.

6.8.5 **Explosive Ordnance Disposal (EOD)**. In the event of an EOD incident in the port, the area will be cordoned off and specialist attendance requested through the Joint operations Centre (JOC) and BFSAI SOP 310 - Joint Service Explosive Ordnance Disposal Operations.

6.9 Search and Rescue

6.9.1 **Policy**. The Falkland Islands has no formalised coastguard service and only a very embryonic Rescue Co-ordination Capability. The BFSAI Joint Operations Centre (JOC) acts in a pseudo Rescue Coordination Centre (RCC) role for the Falkland Islands and the JOA, but with some caveats. BFSAI is responsible for SAR support to military operations, military contractors on duty and to civilian aircraft under charter/contract to the UK MoD. The Falkland Islands Government (FIG) remains responsible for the provision of SAR to support civilian incidents. FIG does not have any dedicated SAR assets, it is to be assumed that Commander BFSAI (CBF) will make BFSAI SAR assets available to assist in a civilian incident, although this is very much dependent on the operational situation at the time and MACA requests.

6.9.2 **SOP**. SAR in the Falklands is conducted under the auspices of the IAMSAR Manual, and locally through SOP 306 - Conduct of Falkland Islands Search and Rescue.

6.9.3 **ECP SAR Assets**. In the event of any request for assistance to support maritime SAR activity, the duty tug is available at 15 minutes notice, 24 hours a day. However QHM as the contract monitoring officer should ALWAYS be consulted before committing the tug out of the port areas due to the legal and contractual implications.

6.10 ECP Emergency Response.

6.10.1 **EOPs**. ECP maintains Emergency Operating Procedures (EOPs) to cover most anticipated emergencies as articulated through the Navigation Risk Assessment and MARNIS/Risk Register.

6.11 Control of Hazardous Activity

6.11.1 **Permits to Work**. Controlled activities, which may include the list below, may need to be endorsed by Port Ops (QHM) where there is a pan port interest:

- Diving;
- Bunkering, fuel transfer and sullage removal;
- Hot Work;
- Working at Height;
- Entering Enclosed Spaces;
- Unusual lifting or slinging activity;

All of these activities are subject to Permits to Work. This system best facilitates the control of hazardous activities to minimise risks. The Permit to Work defines the minimum emergency response measures (MARPOL equipment, fire fighting measures, and first aid attendance) that must be in place before the work can commence.

CHAPTER 7: CONSERVANCY, ENVIRONMENT & CONSERVATION

PMSC: A harbour authority has a duty to conserve the harbour so that it is fit for use as a port. It also has a duty of reasonable care to see that the harbour is in a fit condition for a vessel to be able to use it safely…

7.1 Conservancy Policy of East Cove Port.

7.1.1 ECP recognises its duty as a Competent Harbour Authority (CHA) to conserve the harbour so that it is fit for use as a port, and will exercise a duty of care to see that the harbour is in a fit condition for a vessel to use it.

7.1.2 ECP will provide users with timely and adequate information about conditions in the harbour.

7.1.3 ECP recognises the extent of its duty and powers as a Local Lighthouse Authority (LLA); and specific powers in relation to wrecks.

7.1.4 ECP maintains a vigilant watch on the navigation marks and for any changes in the sea bed or undersea flora (kelp) which may affect the safety of navigation.

7.1.5 The Queen's Harbour Master is the Responsible Officer for all Conservancy matters within East Cove Port.

7.2 Hydrography

7.2.1 **Survey**. East Cove Port is charted on Admiralty Chart BA 2506 (Mare Harbour and Approaches) at 1:12 500 scale. The main approach channels were subject to full survey in 2011 and have received periodic partial survey updates in subsequent years. Minor changes were incorporated in 2015.

7.2.2 **Datum Positions**. Chart BA 2506 uses the WGS 84 datum. There are no known datum anomalies in the port.

7.2.3 **Survey Updates**. Chart BA 2506 is kept up to date through the services of visiting military hydrographic survey vessels, particularly HMS PROTECTOR and periodic visits by the Fleet Mobile Hydrographic Unit (FMHU). Specific requests for hydrographic tasking are raised by QHM; results are incorporated in charts at the earliest opportunity commensurate with UKHO tasking and priorities. Significant differences to charted data will be promulgated by LNTM.

7.2.4 **Bathymetry**. Repeat and check surveys since the full 1982 survey conducted before the port was built have revealed that there is little if any noticeable change to the bathymetric profile in the port. The only area subject to light estuarine activity is to the north west of the Mare Harbour Shoal due to the outflow from Swan Inlet.

7.2.5 **Undersea Fauna**. Mare Harbour and approaches are especially prone to kelp beds which are clearly marked on Chart BA 2506. The rate of encroachment varies year on year (climate related) but it is generally accepted that the navigable water – particularly on the 014˚ approach leg passing Pandora Point and in the vicinity of the Choiseul Sound Shoal –

is steadily reducing. A kelp survey was conducted in Jan 17 and will be incorporated on the chart in due course.

7.2.6 **Tidal Data**. ECP is listed as a Standard Port (Falkland Islands - Mare Harbour) in NP207(7) (Tide Tables, South West Atlantic & South America). Stanley is also a Standard Port. Tidal ranges do not exceed 1.1m at Springs (See Table 1), supporting the assertion that water movement across the port areas is not prone to rates which are liable to have a significant impact on navigation.

Place	LAT (S)	LONG (W)	MHWS	MHWN	MLWS	MLWN
Mare Harbour	51 54	58 27	1.3	0.9	0.2	0.4

Table 1: Tidal Levels above Chart Datum

There are no currents that affect Mare Harbour or East Cove. A tidal flow meter was laid in Hecate Channel in Jan-Feb 17; data will be published once extrapolated, and published in tidal diamond form on Chart BA 2506 in due course.

7.3 Promulgation of Survey and Navigation Information

7.3.1 **Admiralty Sailing Directions (ASD)**. ECP is listed in ASD 6(2) – The South America Pilot - Sections 2.342-2.357. The ASD also contains detailed climate information.

7.3.2 **Notices to Mariners (NtoM)**. ECP sits within NAVAREA VI, controlled by Argentina through their Maritime Rescue Coordination Centre (MRCC) at Ushuaia. As a local military port ECP rarely has need to publish NtoM for issues that affect international shipping. However if the need arises (for example long term defects to key navigational aids) a NtoM is submitted to UKHO Taunton who pass to MRCC Ushuaia as the controlling authority on the port's behalf.

7.3.3 **Local Notices to Mariners (LNtoM)**. LNtoMs are known as Falkland Islands Navigation Warnings (FINAVWARNs). The procedure for issuing a FINAVWARN is covered in SOP 326. FINAVWARNs are administered by DQHM through HQBFSAI on behalf of QHM; the importance of close liaison is therefore implicit. A summary of in-force FINAVWARNs is published in the Falkland Islands Naval Weekly Operational Programme (FINWOP).

7.3.4 **GMDSS**. The Falkland Islands does not currently have a Digital Selective Calling (DSC) facility and only a rudimentary ability to submit marine safety information (MSI) to the NAVTEX network. ECP has no ability to monitor GMDSS or NAVTEX. HQBFSAI (Joint Operations Centre) has a basic GMDSS alerting facility.

7.3.5 **Traffic Management**. ECP offers only a Local Port Service (LPS) (See Chapter 8). A listening watch is maintained on VHF Ch 16/12 over which basic navigational information may be passed.

7.4 Aids to Navigation

7.4.1 **Overview**. East Cove and Mare Harbour now have a complete set of new floating navigational buoys with Sealite solar powered lights fitted. 9 in number. This contract is overseen by SALMO. The marine service contract Tugs maintain and provide these buoys and lights on behalf of SALMO including the ground tackle. Any issues are reported to QHM, and SALMO through monthly checks.

7.4.2 **International Association of Lighthouse Authorities (IALA)**. ECP sits within IALA Region B.

7.4.3 **Local Lighthouse Authority (LLA)**. The Falkland Islands has not established a General Lighthouse Authority (GLA) in law. QHM acts as a LLA for the lights and marks within ECP.

7.4.4 **Admiralty List of Lights**. ECP's lights and beacons are listed in Admiralty List of Lights and Fog Signals (NP80) Vol G – Western Side of South Atlantic Ocean – G1354-G1356. Changes are promulgated through Notices to Mariners (NtoM).

7.4.5 **Light Availability Criteria**. ECP lights form part of the defence estate which is managed by the Defence Infrastructure Organisation (DIO). Locally DIO sub-contracts maintenance of the lights to Mitie. The fault reporting procedure is detailed at SOP 329 - NavAid Failure.

ECP DECLARES CATEGORY 3 AVAILABILITY – 97.0%.

7.5 Wrecks

7.5.1 **Authority**. QHM retains the authority to mark, raise, remove or destroy a wreck which is, or is likely to become, a danger to navigation.

7.5.2 **Risk Assessment**. In the event of any vessel becoming wrecked in or near the harbour, approaches or outer roads a Risk Assessment will be conducted with the aim of reducing the risk to navigation as low as reasonably practicable.

7.6 Salvage

7.6.1 **Authority**. ECP has no specific additional authority for salvage within the Port Ordinance No.18/1987.

7.6.2 **Application**. Salvage presents complex legal challenges which, if not correctly applied, may render ECP and the MoD liable for significant costs. Before proposing any form of salvage activity whether within the port limits or through offering assistance with port tugs or other assets, specialist advice will be sought from the Salvage and Marine Project Team at Abbey Wood (SALMO) and the STRATCOM Legal Advisor. The Falkland Islands Government (Chief Executive & Marine Officer) will be closely involved via HQBFSAI Command Secretariat.

7.7 Regulation of Harbour Works

7.7.1 **Authority**. Harbour works at ECP are relatively uncommon, however QHM retains the authority to licence the works where they have an impact on the safety of navigation. In any case the project management will be closely overseen through liaison with the DIO and local contractors.

7.7.2 **Risk Assessment**. Where harbour works have the potential to impact on the safety of navigation or safe operation of jetties, pontoons or walkways an appropriate Risk Assessment will be raised.

7.8 Environment. ECP Authority (ECPA) recognises its duty to exercise its functions with regard to nature conservation and other related environmental considerations.

7.8.1 **SHEP**. The BFSAI manual on Health and Safety policy and functional objectives for managing the East Cove and Mare Harbour areas is accessed through the BFSAI home page. These lie within and adjacent to a RAMSAR site and Important Bird Area (IBA), in an environmentally responsible and sustainable area.

7.8.2 The ECPA maintains good liaison and working links with the FIG Environmental Planning Department and Biosecurity Officer, who are routinely consulted on matters where there may be an impact to the environment. There are several emergency plans drawn up to deal with accidents that might potentially threaten the environment.

7.8.3 Biosecurity protocols and the control and management of rodents and invasive species is of particular importance to East Cove Port given the routine use by research, patrol and science vessels visiting South Georgia or the Antarctic.

7.9 Conservation. ECP will proactively work with conservation groups to contribute to the environmental and conservation credentials of the Falkland Islands in general.

CHAPTER 8: MANAGEMENT OF NAVIGATION

PMSC: Take reasonable care that all who navigate in the port may do so without danger to their lives or property…

8.1 Policy. QHM exercises their right as a Competent Harbour Authority (CHA) to manage and regulate navigation and the movement of marine traffic through his authority vested in the Naval Ports Ordinance 1987, and through the application of the recommendations in the Port Marine Safety Code (PMSC) as the articulation of best practice. The full range of powers is described in Chapter 1.

8.2 Byelaws and Directions. ECP is not subject to any specific byelaws, however the following directions are issued:

8.2.1 **General Directions**. QHM's General Directions apply to all vessels regardless of whether they are piloted by an ECP Pilot or are the holders of Pilotage Exemption Certificates.

8.2.2 **Pilotage and Towage Directions**. QHM's Pilotage and Towage Directions are issued with the General Directions, and as with General Directions they apply to all marine users of the port.

8.2.3 **Special Directions**. Special Directions are normally time or vessel specific, for operational purposes and are generally of short duration. They may be used to impose a direction in advance of formal incorporation into the General Directions.

8.2.4 **Dangerous Vessel Directions**. Under the Dangerous Vessels Act 1985, QHM may give Directions prohibiting the entry into, or requiring the removal from, the ECP of any vessel if, in their opinion, the condition of that vessel, or the nature or condition of anything that it contains, is such that its presence in ECP might involve a grave and imminent danger to the safety of persons or property or risk that the vessel may, by sinking or foundering in ECP, prevent or seriously prejudice the use of ECP by other vessels. QHM must have regard to all the circumstances and to the safety of any person or vessel.

8.2.5 **Issue of Directions.** Directions will be issued by QHM and formally disseminated in a FINAVWARN. All regular users of ECP will be informed of these new/amended directions at the weekly FINWOP meeting or directly from QHM via email or telephone call. Some Directions such as Special Direction may be given by a verbal order by QHM. In QHM's absence DQHM may issue Directions.

8.3 Public Right to Navigation. As a Military Port, there is no public right to navigation within the defined port areas. All vessels require specific authorisation to visit the port. These restrictions are articulated in the Naval Ports Ordinance.

8.4 Local Port Service (LPS)

8.4.1 **Policy**. ECP does not have sufficient traffic to warrant a Vessel Traffic Service (VTS). A limited LPS is provided which is able to provide the following information:

- Berthing information;
- Availability of port services;
- Details of shipping movements;
- Limited weather information, including wind speed and direction in the port.

8.4.2 **LPS Operator Training**. There are no career courses funded for the ECP Port Ops Controllers; this is an acknowledged weakness that is captured in the NRA and MARNIS. Operators are however, 'Bowman' trained and receive an acquaint package as part of their induction training to assure a minimum safe level of service; they may therefore be considered competent operators.

8.4.3 **ECP Radio Limitations**. Radios are generally effective for ECP needs. They prone to terrestrial blind spots.

8.5 Traffic Management

8.5.1 **Policy**. ECP's primary duty is to ensure the safe and efficient use of the harbour through the regulation and direction of traffic. These powers are articulated in Chapter 1.

8.5.2 **Application**. ECP applies traffic management through the following controls:

- A permissive system – there is no automatic right of entry to the port;
- Planning – all movements are planned through the FINWOP, including the issue of changes as appropriate;
- All moves are Piloted with the exception of those vessels holding a Pilotage Exemption Certificate (PEC) (generally only the FIPV) and those vessels under 40m in length;
- As far as reasonably practicable movements are de-conflicted to ensure only one vessel (other than harbour tugs) is moving in the port at any given time;
- Reporting Points at Fox Point and Pandora Point give clear notification to the LPS that a ship is moving;
- Vessels are required to operate AIS within the port limits to give visibility to QHM and the Port Operator;

8.5.3 **Limitations**. ECP does not have situational awareness tools of sufficient fidelity to be able to give direct navigational instructions. This limitation is mitigated through ensuring only single vessels are working in the port areas, and that QHM and Pilot have discussed berthing or departure plans prior to authorisation. Port Operators are not SQEP to give navigational information or directions to ships.

8.6 AIS

8.6.1 **Policy**. All vessels with fitted equipment are to transmit on AIS within the roads and port limits. Equipment deficiencies are to be reported to QHM in advance.

8.6.2 **Display & Limitations**. AIS is to be available and displayed to the Port Ops Controller – this is achieved by online resource. However all personnel are to be aware that the system is only provided as a situational awareness tool and should not be used as the sole basis for any decisions regarding the passing of navigational or traffic information under the guise of a Local Port Service.

8.7 Port Passage Plan

8.7.1 **Policy**. QHM will discharge their duty to regulate the time and manner of a vessel's entry to, departure from and movement within ECP through the FINWOP or direct communication if required. A Port Passage Plan is mandatory for both vessel and Pilot in advance of any move in accordance with SOLAS V Regulation V/34.

8.7.2 **ECP Port Pilotage Plan**. The ECP Port Pilotage Plan should be used as the basis for the vessel and Pilot's plan for entry to, or exit from, the port in conjunction with relevant weather and tidal data. The passage plan is a contract between Pilot and Master and is to be retained by the Chief Pilot as a record; QHM may demand copy of the passage plan if required.

8.7.3 **Master Pilot Exchange (MPX)**. Details regarding the MPX are contained in Chapter 9 (Pilotage).

8.7.4 **Reporting Points**. Mandatory Reporting Points are established at Fox Point for entry / exit form Choiseul Sound, and Pandora Point for the harbour approach channel. Although not currently shown they are due to be added to Chart BA 2506.

8.7.5 **Point of No Return (PONR) and Passage Abort**. The Point of No Return for entering the port is passing Pandora Point from where navigation is constrained until well inside Mare Harbour. The area to the East of the Single Point Mooring creates another decision point before committing to Hecate Channel for entry to East Cove and the main port complex and jetties.

8.7.6 **Passage Record Keeping**. All passage and pilotage plans are to be recorded and retained for inspection by the ECP Authority (QHM) on request or for submission as evidence in the event of an incident. It should be noted that ECP has no electronic recording devices for radio or AIS tracks.

8.8 Harbour Patrols

8.8.1 Harbour patrols are conducted as required. For environmental or OSR incidents a harbour tug may be used.

8.9 Recreational Navigation

8.9.1 **Policy**. As a military port, ECP does not routinely authorise recreational activity on the water. Severe weather conditions and prevalent high sea states are not conducive to inexperienced water users; water sports are normally confined to Gull Island Pond (inshore lake). Limited use for experienced wind or kite surfers, fishing and the sub aqua club RHIB, are authorised on a case by case basis.

8.9.2 **Procedure**. The policies for recreational activity on the water are detailed in SOP 403 (Sub Aqua Club)[1] and the Sign Out Procedure for Wind and Kite Surfing.

8.9.3 **Limitations**. The operation of RHIBs and small craft was identified in the NRA and MARNIS as one of the higher risk activities on the water in the port area. Limitations are defined in General Directions; in sum, service boats are not authorised for recreational journeys. Operational acquaints are periodically authorised to allow other departments or services to witness the work of the port, but these are subject to strict weather, sea state and operating parameter limitations to minimise the risks.

8.10 Shore Side Life Saving Equipment

8.10.1 **Policy**. ECP is responsible for the provision of Shore Side Life Saving Equipment, at reasonably spaced intervals, in all areas where there is a risk of persons falling into the water in accordance with the HSE Approved Code of Practice - Safety in Docks.

[1] Club in abeyance at time of writing.

8.10.2 **Provision**. Fluorescent life rings are provided no more than 50m apart on all jetty fronts on both main and west jetty sites. The rings have lifelines attached. Additionally, escape ladders are provided at no more than 50m distances on all jetties, and on all mooring dolphins.

8.10.3 **Testing and Assurance**. Fixed lifesaving installations (ladders) are the responsibility of the DIO and are tested annually through their sub-contractors Mitie. The life rings are accounted for and regularly checked by the NEFI Cox'n (West Jetty) and SQMS (Main and RoRO Jetties) and recorded in a local log.

8.11 Subsea Pipelines

8.11.1 **Policy**. ECP has critical infrastructure pipelines running from the Single Point Mooring (SPM) in Mare Harbour to a beachhead valve from whence they run to the Petroleum Storage Depot (PSD). QHM has responsibility as the AP's representative for the infrastructure on the water side until the beachhead valve. The areas surrounding the pipelines are clearly marked on Chart BA 2506 as restricted access preventing anchoring or other unauthorised activity.

8.11.2 **Maintenance and Testing**. DE&S SALMO are responsible for the maintenance and testing of the SPM and subsea pipelines through an enabling contract with Briggs Marine. A strict regime is followed to assure the integrity of the system.

8.11.3 **Emergency Preparedness**. Incidents or accidents involving the SPM and undersea pipelines will invariably involve an oil spill. Precautions and responses are detailed in the Oil Spill Contingency Plan (OSCP). Vessels are not authorised to anchor in the vicinity of the SPM or undersea pipelines to minimise the risks to the infrastructure through dragging of anchors or poor positioning.

8.11.4 **Undersea Power Lines**. ECP has no live undersea power lines. There is a redundant line which runs beneath Hecate Channel.

8.12 Anchorages

8.12.1 There are no formalised anchorage positions within the port areas, however this policy is kept under constant review. Restricted areas and areas where not to anchor are shown on Chart 2506.

8.13 Prevailing Conditions

8.13.1 **Policy**. The prevailing weather conditions are generally the overriding factor determining the management of navigation and traffic regulation in the port. Detailed restrictions are published in General Directions.

8.13.2 **Weather Forecasts**. The Meteorological Office's inshore waters, shipping forecast and 2 and 5 days forecasts are displayed in Port Operations and updated daily. Information is readily available for visiting units either verbally, by military signal or by e-mail. Average meteorological conditions for the port are detailed in General Directions.

CHAPTER 9: PILOTAGE SERVICES

PMSC: Assess what Pilotage services are required to secure the safety of ships, and to provide such services if deemed necessary…

9.1 Policy. East Cove Port is a Competent Harbour Authority (CHA) as recognised by the PMSC. Whilst the Pilotage Act (1987) has not formally been adopted by the Falkland Islands, ECP will apply the provisions of the act as far as is reasonably practicable in determining the need for and providing a Pilotage service.

9.1.1 **Application**. Pilotage will apply in Pilotage Waters, as defined in Mare Harbour (Declaration and Definition) Order (SR&O No.9 of 1989).

9.2 Competent Harbour Authority (CHA). QHM as the CHQ retains the sole responsibility for the recruitment, authorisation and discipline of the ECP Pilots, which are supplied through a contract with a Falklands Marine Services Company (Byron Marine (2017)). He is also responsible for the granting of Pilotage Exemption Certificates (PEC), their regulation and the professional discipline and conduct of PEC holders within the port. PECs can be applied for by contacting QHM. A discussion on local knowledge and regulations is undertaken between candidate, Pilot and QHM. This is based on Admiralty chart 2506. A tug familiarization trip is also required.

9.2.1 **IMO Resolution A960**. IMO resolution A960 makes recommendations on the training and certification of Pilots, which are adopted where practicable within East Cove Port Pilotage Regulations.

9.2.2 **Occupational Standards**. The National Occupational Standards (NOS) for Pilots, whilst not completely applicable to the East Cove setting, nevertheless provides a useful resource and benchmark for the application of training standards for ECP Pilots and is incorporated where applicable within the East Cove Port Pilotage Regulations.

9.2.3 **Pilot Training**. Noting that pilotage is a contracted service, QHM delegates the training of Pilots to the Chief Pilot, who will apply the standards articulated in 9.2.1-9.2.2 above. QHM acts as arbiter of standards and will monitor the training progress of new Pilots. Chief Pilot will present a trainee for licencing by QHM when it is assessed he has met the required competence standards.

9.3 Provision of Pilotage Service. ECP provides a Pilotage service following comprehensive analysis through the Navigation Risk Assessment and MARNIS. Pilotage is therefore a risk reduction measure to mitigate unfamiliarity of visiting ships with the challenging conditions and confined pilotage waters of Mare Harbour and East Cove. Pilotage is mandatory . The circumstances where Pilotage is compulsory, or where a Pilotage Exemption Certificate (PEC) may be applicable are detailed in the Pilotage Regulations.

9.4 Pilotage Regulations. ECP issues Pilotage Regulations that define the structure of the Pilotage Service. These regulations include:

- Where, and for whom, compulsory Pilotage applies;
- Arrangements for the application, assessment, approval, renewal and use of Pilotage Exemption Certificates;
- Pilot training and authorisation process;
- Conditions governing the provision of Pilotage services;
- Procedures for requesting the services of an ECP Pilot;
- Details of ECP Pilotage radio procedures.

9.5 Pilotage Directions. ECP issues Pilotage Regulations for application within the geographic limits of Pilotage Waters, as defined in Mare Harbour (Declaration and Definition) Order (SR&O No.9 of 1989). The Pilotage Directions are the "front end" of the Pilotage Regulations and ultimately derive from the NRA and MARNIS.

9.6 Responsibilities of the Ship under Pilotage. The Master or Captain of the ship under Pilotage retains responsibility for the safe navigation of his ship and the conduct of bridge procedures and bridge resource management at all times.

9.6.1 **Role of the Pilot**. The ECP Pilot's primary duty is to use his skill and knowledge of Choiseul Sound, Mare Harbour and East Cove to protect ships under his Pilotage direction from collision or grounding whilst manoeuvring in Pilotage waters.

9.6.2 **Responsibility of the Pilot**. The responsibility of the Pilot for conduct of navigation must be clearly understood between the Captain/Master and the Pilot, and recorded in the Ship's Log and on the Pilotage Record Card. Under the provisions of the Pilotage Act (1987) the Pilot is not merely an advisor but has legal conduct of the navigation of the vessel unless it has been ***very clearly articulated that he is only present in an advisory capacity***. This advisory relationship is the accepted normal state for a warship entering or leaving ECP with a Pilot embarked.

9.6.3 **Support to the Pilot**. ECP expects all visiting ships to provide the fullest support to the embarked Pilot to allow them to conduct their duties effectively. As a minimum this will include:

- Provision of a Pilotage Card detailing the ships propulsion, layout and handling characteristics, and any limitations affecting the manoeuvrability of the vessel or the safe conduct of navigation;

- A well prepared passage plan;

- Sufficient trained and experienced members of the bridge team to support the Pilot and the safe manoeuvring of the vessel;

9.6.4 **Reporting Substandard Performance**. The Pilot has a statutory duty to report any ship deficiencies that may affect safe navigation. Initially this will be to QHM who, with the Pilot, will make a decision as to whether to allow the vessel to enter Pilotage waters (or leave the berth). A report may be made to the Falklands Maritime Authority, owner/operator or flag state as applicable. A vessel also has a responsibility to report to QHM any concerns over the performance or conduct of an ECP Pilot in the execution of his duties.

9.7 Pilot Boarding and Landing Arrangements. ECP has a risk assessment in MARNIS for the boarding and landing of Pilots. The Pilotage Regulations (QHM Directions Prt 2 Para 4) also refer. The Pilot Embarkation Point is 1nm to the East of the Choiseul Sound Shoal cardinal mark; this boarding position is incorporated in Chart BA 2506. Pilots will normally embark or disembark from a vessel alongside using the ships gangway unless the Pilot specifically requests to join or

leave via the tug. In this case all usual safety requirements for boarding ladders should be adhered to.

9.7.1 **Confirmation of Pilot Boarding Arrangements Compliance**. The Master or Captain of any vessel embarking an ECP Pilot is required to make a verbal declaration to the Pilot prior to embarkation that the Pilot ladder is:

- Properly constructed and inspected, and in good condition, and is;
- Properly rigged as per SOLAS and IMO requirements, and;
- Is at a height above the waterline as requested by the Pilot.

9.7.2 **Conditions for Embarkation**. Masters / Captains and the Pilot need to make sensible risk based decisions on the weather and sea-state conditions for conducting the transfer. Vessels must adjust their course and speed to that requested by the tug and Pilot in order to minimise the risks of transfer by providing adequate lee and reducing the interactive movement between vessels. If there is any doubt the transfer must not be attempted; the vessel should heave to in the roads and seek QHM's direction. Invariably this will be to wait until conditions abate sufficiently to allow a safe transfer.

9.8 Pilotage Briefing. Sufficient time and sea-room must be allowed in the passage plan for embarkation of the Pilot and a comprehensive briefing and handover between Captain/Master and the Pilot. The brief must include, as a minimum:

- A review of the passage / pilotage / berthing plan;
- Detailed instructions for the connection and employment of tugs, including sufficient time for briefing the tugs over VHF;
- Any limitations the vessel may have before committing to Pilotage waters;
- A clear understanding of the relationship and responsibility between Pilot and Captain / Master;
- A clear briefing to the Pilot of those members of the Bridge Team who are there in a capacity to support him, and the roles they undertake;
- Arrangements for monitoring tug safety on the disengaged / blind side of the vessel.

9.9 Pilot Authority. The ECP Pilot retains the absolute authority to delay or deny entry to the port, or departure from a berth, to any vessel which the Pilot feels has not met the minimum standards of preparation, briefing or attention to safety. In such case the vessel will be instructed to either heave-to or anchor in the roads, or remain alongside, until direction has been sought from QHM.

CHAPTER 10: TOWAGE ARRANGEMENTS

PMSC: Procedures for towage in ports need to be developed, managed and regularly reviewed by harbour authorities to ensure a safe and efficient service…

10.1 Policy. East Cove Port has assessed the need to provide a towage service for operations as articulated in the Navigation Risk Assessment and MARNIS. QHM as the CHA retains the authority to mandate when towage is compulsory.

10.1.1 **Application**. ECP Towage arrangements will apply in Pilotage Waters, as defined in Mare Harbour (Declaration and Definition) Order (SR&O No.9 of 1989).

10.1.2 **Conditions**. Whilst not formally adopted in Falkland Islands law, ECP will adopt the principles of the UK Standard Conditions for Towage and Other Services (Revised 1986).

10.2 ECP Tug Arrangements. See also para MSMS 5.8, and ECP NRA. ECP has two conventionally propelled 309 Gross Tonnage, 30m Damen built tugs available for towage operations. QHM is the local contract monitoring Officer responsible for the day to day conduct of towage operations; this function is delegated to PSM for routine business.

10.3 Tug Safety Management and Classification. The VWG tugs GIESENSTROOM (GIES) and DINTELSTROOM (DINT) are in class with Bureau Veritas, and subject to that classification society's annual inspection and certification regime. VWG makes copies of the certification available to DE&S SALMO. VWG have also adopted (2017) an International Safety Management (ISM) accredited Safety Management System for the regulation of their operations. This system is entirely complementary to this ECP MSMS, and available to QHM for assurance purposes on demand.

10.4 Towage Directions. ECP provides Towage Directions which articulate:

- Tug arrangements and power availability;
- Limitations of conventional powered tugs;
- VHF communications for towage operations;
- Escort Towage (mandatory or passive);
- Harbour (berthing and unberthing) towage;
- Minimum acceptable visibility for towage operations;
- Maximum swell conditions for towage;
- Conditions for attaching or letting go tugs;
- Cold Moves.

10.5 Control of Tugs during Towage. Conventionally propelled tugs such as GIES and DINT are at a significantly higher risk of girding than Voight or Azipod craft if close attention and control is not exercised over their use. The following conditions apply:

10.5.1 **Pilot Embarked**. If a Pilot is embarked, he will be responsible for the employment and control of the tugs, including the issuing of instructions.

10.5.2 **PEC Vessel**. A Captain / Master in possession of a PEC will have covered the employment and control of ECP tugs during his PEC award process, which will include acquaint trips on the tugs and discussions with QHM / Pilot / Tug Masters. He is thus authorised to exercise control of the tugs during routine berthing or unberthing manoeuvres. However, the risks to the tugs are higher than if the experienced Pilot is controlling, and PEC Masters/Captains must maintain an acute awareness of the dangers

of girding a conventionally propelled tug in the event of sudden or unexpected manoeuvre. QHM reserves the right to mandate the employment of a Pilot for an unusual or unconventional move.

10.6 Responsibility of the Towed Vessel to the Tug. Regardless of who is responsible for the control of the tugs, the relationship must at all times be absolutely clear and recorded in the Ship's Log and Pilot's Notebook. It must also be agreed at the Pilot's or Entering/Leaving Harbour Brief prior to committing to the evolution. The following points must be followed:

- Employment of the tugs is carefully pre-planned, taking into account the prevailing weather conditions and any ship limitations;
- The tugs must be briefed before committing to Pilotage waters, and acknowledgement / agreement received;
- The briefs and acknowledgements must be recorded in the ship's, Pilot's and Tug's logs or notebooks;
- The ship remains responsible for a detailed "tool box talk" for their deck teams working the tugs lines;
- Appropriate equipment (slips, axes, mauls etc) must be provided for slipping the tug in an emergency;
- Bridge team management must include provision of an appropriately qualified safety number / lookout on the disengaged side of the berthing / unberthing vessel with responsibility for alerting the controlling officer if the tug appears to be experiencing difficulty with the towage arrangements.

10.7 Dead Tows and Project Towage. Dead tows, unusual objects or non-routine towage events will require individual risk assessments and method statements to be prepared and approved prior to QHM sanctioning the evolution. This may include the involvement of a Pilot. The Tug Master is responsible for preparation of the Towage Plan; where practicable for an unusual (planned) move QHM written approval of the plan should be sought.

10.8 Salvage and Search & Rescue. The BFSAI Joint Operations Centre (JOC) is a formalised Rescue Coordination Centre (RCC), defined within NAVAREA VI of ALRS Vol 5 (GMDSS). However, this is for a Command and Control (C2) function; there is no formal arrangement for the provision of SAR assets to the Falkland Islands Government. Requests for SAR support are made under the provisions of the International Air Maritime Search & Rescue (IAMSAR) framework which mandates a duty to assist in saving life where able.

10.8.1 **Requests for Assistance**. Requests for the assistance of the ECP tugs must be made in the first instance:

- For an emergency situation direct to the BFSAI JOC, who will activate the BFSAI Emergency Planning Organisation;
- Where time allows by the FIG to the BFSAI Command Secretariat who will decide with the Command Team on whether assistance can be rendered dependent upon other operational priorities, tasking and availability.

10.8.2 **Salvage**. As with SAR, a request must be made to the JOC / HQBFSAI as above in the first instance. Salvage has complex legal implications which will invariably require consultation with MoD legal teams before committing to offering salvage assistance. In most cases it may also involve taking the tugs "off hire" under the terms of the BIMCO contract. This will also require the written agreement of SALMO and VWG.

CHAPTER 11: MARINE SERVICES

PMSC: Harbour vessels or craft and activities in support of the maintenance of navigation, hydrography, diving or mooring should be fit for purpose and appropriately trained and qualified…

11.1 Policy. East Cove Port has assessed the need to provide Marine Services for operations as articulated in the Navigation Risk Assessment and Hazard Log. QHM as the CHA regulates the provision and standards of Marine Services.

11.1.1 **Application**. ECP regulation and governance of Marine Services will apply within the port limits as defined in Mare Harbour (Declaration and Definition) Order (SR&) No.9 of 1989).

11.1.2 **Conditions**. Whilst not formally adopted in Falkland Islands law, ECP will adopt the principles of the relevant UK legislation (for example Merchant Shipping (Small Boat) Regulations (1998), Work Boat Code (2016), Diving at Work Regulations (1997), associated ACOP and applicable MoD publications (JSPs, BRs)) as articulation of best practice in the regulation of Marine Services.

11.2 ECP Marine Service Arrangements. ECP contracts Van Wijngaarden Marine Services B.V. (VWG) for the provision of Marine Services, specifically two harbour tugs and a multi-purpose barge (MP 3002). The MoD contract is administered by Defence Equipment & Support Salvage & Marine Project Team (DE&S SALMO PT); QHM is the local contract monitoring Officer responsible for the day to day conduct of Marine Service operations through the PSM.

11.3 Regulation of ECP Craft. The VWG tugs GIESENSTROOM and DINTELSTROOM, and the barge MP3002 are in class with Bureau Veritas. VWG have also adopted (2017) an International Safety Management (ISM) accredited Safety Management System for the regulation of their operations. The VWG craft are governed by a comprehensive risk and method statement based framework.

11.3.1 **Inspection and Licencing**. The three VWG craft are inspected annually by Bureau Veritas as a condition of classification. DE&S SALMO visit annually for contract assurance. QHM monitors the safe delivery of operations on a daily basis. The tug Masters are fully integrated into the ECP MSMS process as key stakeholders.

11.3.2 **Service Boats**. Service boats (RHIBs and RRC) are subject to MoD inspection and licencing regimes, including scheduled Lloyds Register scrutiny. RHIBs are not routinely used for marine service operations with the exception of support to the securing of vessels to the Single Point Mooring. This activity is covered under the SPM SOP.

11.3.3 **Visiting Craft**. Periodically vessels visit in support of specific projects (infrastructure works, contract diving, conservation or environmental projects). These craft are specifically authorised by QHM to operate in the port on a case by case basis.

11.4 Workboats and Pilot Launches. ECP has no dedicated workboats or pilot launches. The harbour tugs are used for all harbour support tasks, and also for the transfer of Pilots. Pilot transfers are covered within the Pilotage Regulations. The tugs also operate small skiffs on occasion, which are subject to the VWG ISM system.

11.5 Commercial Diving.

11.5.1 **Policy**. All commercial diving activity conducted on the MoD estate, worldwide, is governed by the UK Diving at Work Regulations (1997 and as amended) and associated Approved Codes of Practice (ACOP). ECP will not sanction any commercial diving operation that does not meet these standards.

11.5.2 **Application**. Commercial diving activity at ECP habitually falls under a contract let by either DE&S (SALMO – for the underwater maintenance of the SPM) or the DIO (diving in support of infrastructure works). A condition of contract is that the company engaged is able to demonstrate full compliance with DWR 97. QHM must have copies of the diving safety management system and method statements before diving is authorised within the port.

11.5.3 **Conduct**. Diving at ECP is governed by a strict Permit to Work system (See Section 6.11). Permits are issued on a daily basis and are time bound; issue of a permit is dependent on:

- QHM/PSM having studied and approved the diving SMS and method statements;
- An in-brief with the Diving Supervisor is conducted prior to commencement of any diving operations;
- The Diving Supervisor is made aware of all port limitations, risks, dangers and movements;
- A daily face-to-face brief is conducted at start of work between Supervisor and QHM/PSM (this authorisation is not delegated below QHM/PSM). Brief will cover the daily scope of intended works, weather and any other port limitations and will conclude with opening of the Permit to Work;
- At close of play the Permit is to be formally closed following debrief between Supervisor and QHM/PSM which confirms that all activity has ceased, divers are clear of water and that any incidents or accidents have been formally recorded.

11.6 Recreational Diving

11.6.1 **Policy**. All recreational diving activity conducted on the MoD estate, or by service personnel worldwide, is governed by DSA 02 (DMR) Defence Diving Regulations which superseded JSP 433 in 2017. ECP will not sanction any recreational diving that does not comply with DSA 02.

11.6.2 **Application**. Recreational diving activity at ECP may be periodically conducted by the Falkland Islands Sub Aqua Club (FISAC)[1], a service diving club which dives under BSAC regulations and is parented by the RAF Sub Aqua Association (RAFSAA) through 22 Training Group. In addition to DSA 02, the club's activities are governed by BRd 2806(5) - Joint Service Sub Aqua Regulations and the club's annual administration order (Ex FISAC DIVER). OC BSW is the Duty Holder for all AT activity.

11.6.3 **Conduct**. Recreational diving is subject to a robust planning and check out procedure which ensures the availability of SAR assets (helo) and a medical evacuation asset (ATLAS C1) in the event of a decompression injury requiring evacuation to the Chilean mainland (nearest approved chamber is Punta Arenas). The planning, check-out and medical evacuation procedures are covered in SOP 403 - Sub Aqua Diving in the Falkland Islands. Diving in the port area is a permissive system which requires QHM

[1] In abeyance at time of writing. Para retained for future reference.

authorisation in advance; although not subject to the Permit to Work system, the SOP covers the requirement.

11.7 Mooring. QHM controls all moorings within ECP. There are two: Single Point Mooring as the primary fuel discharge and delivery mechanism, and a temporary mooring for the spare SPM. All mooring activity is subject to specific authorisation and will invariably involve the services of the Pilot.

11.7.1 **Single Point Mooring**. The SPM operations are governed by the SOP / Discharge Order and Operators Safety Case.

CHAPTER 12: INCIDENT REPORTING & INVESTIGATION

PMSC: Address the potential for incidents to occur and provide instruction and guidance on the reporting and recording of incidents and any investigations or enforcement that may be required as a result…

12.1 Policy. As a Competent Harbour Authority (CHA) ECP recognises its statutory duty and obligation to conserve and facilitate the safe use of the port, and to provide a duty of care against loss caused through any negligence within the ECP area of jurisdiction. Accidents and incidents are prevented wherever possible through a robust safety management system and mitigation against hazards identified in the Navigation Risk Assessment, MARNIS and the BFSAI risk register. It is recognised, however, that no matter how effective this MSMS is, accidents and incidents can still occur, and may involve death, serious injury, material damage, pollution or other serious outcomes. QHM (in person or by proxy) will investigate all such incidents to ensure that any lessons are identified and learnt, and that legal action or enforcement, where applicable, is taken.

12.2 Purpose. Investigations of incidents or accidents have two essential purposes:

- To determine the cause of the accident, with a view to preventing a recurrence of that accident, and;
- To determine whether an offence has been committed.

12.3 Definitions. The HSE defines:

- **Accident**: an unplanned or uncontrolled event that results in injury or ill health to people, damage to plant, machinery or the environment.

- **Near miss**: an event not causing harm, but has the potential to cause injury or ill health.

The following definitions are in accordance with Marine Guidance Note (MGN) 564[1], which has been adopted as the standard method by the Dockyard Ports Board. MGN 564 replaced MGN 458 rationalising to just 2 categories. These circumstances must be reported to the MAIB:

12.3.1 **Marine Casualty**. A marine casualty is an event of sequence of events that has resulted in any of the following, and has occurred directly by or in connection with the operation of a ship:

- The death, or serious injury to, a person;
- The loss of a person from a ship;
- The loss, presumed loss, or abandonment of a ship;
- Material damage to a ship;
- The ship being unfit to proceed, or requires flag state approval or a condition of class before it may proceed.
- At sea, a breakdown of the ship, requiring towage.
- The stranding or disabling of a ship, or the involvement of a ship in a collision;
- Material damage to marine infrastructure external to a ship (i.e. jetties) that could seriously endanger the safety of the ship, another ship, or any individual;

[1] MGN 564 Marine Casualty and Marine Incident Reporting.

- Pollution, or the potential for such pollution to the environment caused by damage to a ship.

12.3.2 **Marine Incident**. A marine incident means an event, or sequence of events, which occurred directly in connection with the operation of a ship, that do not meet the criteria to be classified as a marine casualty but that endangered or, if not corrected would endanger, the safety of the ship, its occupants or any other person or the environment. Examples of marine incidents include:

- Close-quarters situations where urgent action was required to avoid collision.
- Any event that had the potential to result in a serious injury.
- A fire that did not result in material damage.
- An unintended temporary grounding on soft mud, where there was no risk of stranding or material damage.
- A person overboard who was recovered without serious injury.
- Snagging of fishing gear resulting in a dangerous heel.

12.3.3 **Severe Pollution**. Pollution incidents are categorised as Tier 1, Tier 2 or Tier 3 under international classifications. Responses are detailed in the ECP Oil Spill Contingency Plan (OSCP).

12.4 Incidents involving Death or Crime. The police will always have primacy in any investigation into an incident involving death or crime. In the first instance the Joint Service Police & Security Unit (JSPSU – Military Police) will be called and will advise on jurisdiction, in consultation with the Command Secretary. Invariably the Royal Falkland Islands Police (RFIP) will be involved.

12.5 Drink or Drugs. Unlike UK law (Railways and Transport Safety Act 2003), QHM does not hold any specific powers to detain a vessel if he suspects that a mariner (Master, Pilot, Seaman) has committed a drink or drugs related offence whilst on duty. JSPSU or RFIP will always be called to take appropriate action. BFSAI employs a trained drug dog for use if necessary.

12.6 Statutory Reporting Requirements.

12.6.1 **Policy**. The MoD Port Incident Reporting and Investigation Policy provides a MoD compliant framework for QHM to meet the regulatory requirement to record and investigate all incidents and accidents as defined and articulated above.

12.6.2 **Principles**. The key principles are to report, classify, inform, investigate, evaluate and, if appropriate, enforce, as follows:

12.6.2.1 **Report**. Accurately capture and record all incidents that occur within or close to the port that have a direct bearing on the port's safety management system and navigational risk assessment. Near misses should be included, if they is any doubt, report it. An immediate report should be made verbally to QHM and PSM, and the written report should follow within 24 Hrs. One of the following reports should be completed and then passed to QHM and the PSM:

- MoD Form 510;
- "Banana Skin" Incident Report;
- Naval Lessons & Incident Management System (NLIMS);
- ECP Incident Report Form.

12.6.2.2 **Record**. The QHM will then ensure that one of their team, normally the Port Services Manager (PSM), records the details of the incident in the ECP Incident Database.

12.6.2.3 **Classify.** ECP classifies and reports all incidents and accidents in accordance with Marine Guidance Note (MGN) 564, for **all waterborne** incidents and near misses. These classifications are detailed in section 12.3 above.

12.6.2.4 **Inform.** QHM will inform:

(1) **Internal to ECP –** the ECP Duty Holder chain and regulator as follows or in any additional circumstance the QHM considers necessary:

Classification	QHM to inform:
Marine casualty	CBFSAI/HQBFSAI – immediately / within 1 hours. ACNS Spt, DP & DMR– within 24 hours.
Marine Incident	HQBFSAI – within 4 hours ACNS Spt, DP & DMR – within 48 hours

Figure 1 – Post Incident Inform Timeline

(2) **External** to the port if the incident involves:

(a) **RN vessels only**. QHM should inform the unit's Flotilla[2] (unit DDH) of all incidents, including near misses, classified as marine casualty and above. There is no requirement for QHM to notify MAIB as RN ships do not come within the meaning of "any United Kingdom ship"[3].

(b) **RN and another, non-RN, vessel.** In the case of an incident between an RN and non-RN vessel in addition to reporting the incident to the unit's Flotilla (DDH), the RN-MAIB Co-operating agreement applies[4]. The agreement for the RN reporting accidents involving an RN ship, aircraft or personnel to the MAIB is if an occurrence results in:

- Loss of life, serious injury, loss overboard of personnel **on another vessel**.
- Material damage to (by whatever cause), disablement, abandonment, grounding **of another vessel**.
- Significant environmental damage as a result of damage **to another vessel**.

(c) If the incident or accident involves an RN ship and another non RN vessel, in a DyP, and meets the criteria above, the MAIB should receive an initial notification about it from Naval Safety Incident

[2] Flotilla SXOs.

[3] The Merchant Shipping (Accident Reporting and Investigation) Regulations 2012, Reg 4

[4] There exists a Cooperating Agreement between the MAIB and RN, when an RN vessel is involved in an accident with another (non-RN) vessel. This gives "in principle" effect to the powers of the MAIB but caveats cooperation will extend only as far as the bounds of security allow. Another vessel is stated as meaning; 1. UK registered (incl RFA) and non UK registered merchant. Fishing or leisure vessels in UK territorial waters; UK registered merchant fishing or leisure vessels in international waters; a non MOD-owned vessel operated by volunteer personnel associated with the RN (e.g. Sea Cadets) within UK territorial waters.

Notification Cell (NSINC) (under the Principles of Co-operation[5]), QHM[6] and from the master of the other vessel[7].

(d) **Non-RN vessels.** Irrespective of whether the incident meets the threshold for reporting to the MAIB, if the incident involves a contracted provider of port services (e.g. VWG) then the PSM, when aware of an incident, should inform the contractor's safety officer. If the PSM is aware of an incident that involves one or more other commercial port users, and he has been notified by one of the parties, he should also inform the other ships involved that he has had such a notification. If the incident is MAIB reportable[8] then QHM must notify the MAIB as soon as possible. **Furthermore, there is an obligation on all parties – master, owner, and harbour authority to examine the circumstances of every accident and to provide a report to the Chief Inspector as soon as is practicable[9].**

12.6.2.5 **Investigation.** Having recorded and classified the information the next stage of the process is to decide the appropriate level of investigation.

(1) **PSM led investigation**. The majority of incidents will be resolved by an independent PSM[10] led investigation and analysis of the incident. This will require the PSM to gather the data necessary in order to complete the incident report forms. Where necessary the additional information should be requested from units involved establishing the causes. The essential facts recorded in the port's database should include the following information:

- Incident type and generic information.
- Ship information (information of all vessels involved)
- Accident specifics (weather, casualty details, pilot/PEC details, damage/pollution, geographical position etc)
- Accident/incident narrative (free text)
- Analysis of the cause and consequence, or in the case of a near miss, potential consequence.
- Action required & MAIB reporting

In the majority of incidents the details above will be sufficient to allow the PSM to conduct the necessary analysis to determine the primary and secondary cause and the recommended action required. However, even so where the potential consequence of an incident could have resulted in a marine casualty QHM may decide that a more formal, QHM led investigation may be appropriate.

(2) **A QHM led investigation**. A QHM led investigation may be appropriate where a more comprehensive investigation and analysis is required in order to establish and analyse the facts reach conclusions as to the cause and the necessary actions that need to be taken. Action should also be taken to preserve and gather evidence (recordings, logs, charts VTS recordings, orders

[5] Where the RN initiates its Accident and Crisis Organisation (ACRO) the Duty Fleet controller will initiate a predetermined cascade which includes MAIB and MCA. It is likely that in any event the MAIB would also be notified by any merchant or fishing vessels involved in or witnessing the accident. When the ACRO is not initiated and the criteria in 4.g(2)(a) above is met, the Naval Service Incident Notification Cell (NSINC) (NAVY-NSINCMAILBOX@mod.gov.uk) within Navy Command Headquarters (NCHQ) will notify the MAIB.
[6] The Merchant Shipping (Accident Reporting and Investigation Regulations 2012, Reg 6(2)(a).
[7] The Merchant Shipping (Accident Reporting and Investigation Regulations 2012, Reg 6(1)(a).
[8] The Merchant Shipping (Accident Reporting and Investigation) Regulations 2012, r6(2)(a).
[9] The Merchant Shipping (Accident Reporting and Investigation) Regulations 2012, r6(4).
[10] All PSM should have completed a 3-day accident investigation course.

or other appropriate paperwork and photographs). They may also be required to interview witnesses. Further guidance on compiling the report can be found in BRd 172 (Guide to Conduct of Unit Level Inquiries) Chapter 6.

(3) **CBFSAI Directed Investigation**. There may be occasions where an incident involves multiple BFSAI agencies outside of QHM jurisdiction. In this case a CBFSAI directed investigation with a multi-stakeholder independent investigation team may be appropriate.

(4) **Police investigations**. There will be occasions, particularly those involving a death, when the local Police may commence a formal criminal inquiry into a particular incident. In this case, whilst the port should do everything to support such as such an investigation, by providing the supporting evidence, the fact that the police investigation is underway does not relieve the port of the need to investigate the incident to establish if any action is required by the Port to amend its safety management system or operating procedure to prevent a re-occurrence.

(5) **MAIB investigation**. In a similar fashion to a Police investigation the MAIB may investigate an incident. If this is the case then the port should do everything to support such an investigation, by providing the supporting evidence. The fact that the MAIB investigation is underway does not relieve the port of the need to investigate the incident to establish if any action is required by the Port to amend its safety management system or operating procedure to prevent a re-occurrence.

(6) **Falkland Islands Government (Marine Officer)**. In some cases it may be appropriate for the FIG Harbour Master / Marine Officer and/or RFIP to undertake a local investigation for subsequent evaluation by QHM staff.

12.6.2.6 **Evaluation and Risk Assessment review**. Accidents that are classified as Marine Casualties and Marine Incidents are to be passed to the AP and DP, for evaluation with QHM, to ensure that all second order effects or lessons identified have been considered. All other classifications of accident are to be reviewed by QHM. Risk assessments are to be reviewed annually in any event but must also be reviewed as part of the evaluation of a specific incident. Risks are to be as low as reasonably possible (ALARP) and 'Tolerable'; if not, must be escalated to the port's Duty Holder (Authorised Person).

12.6.2.7 **Enforcement**. Once an incident has been evaluated, QHM must consider what, if any enforcement action may be appropriate. However, legal advice must be sought from Central Legal Services (via HQBFSAI) and, where MOUs exist, JSPSU/RFIP to determine whether sufficient evidence exists and that it is in the interests of the MOD and the Port to embark on a civil action to enforce.

12.7 Publishing Information. ECP will make full details of any incident or accident known at the earliest possible opportunity commensurate with any ongoing investigation, giving due regard and care not to compromise any legal process or General Data Protection regulations (GDPR). Details are published to aid the learning process and as an important factor in preventing recurrence. Incidents will be discussed at the Monthly Port Operations Safety Meeting and reported in the Annual Report.

12.8 Release of Information. On written request QHM will provide an officer of a statutory investigation authority with such information as he or she requires. QHM will ensure that this

information is provided in such form as the officer may require. Without prejudice to this, QHM will refuse requests for the release of information where, in the opinion of the MOD, this information is:

- Subject to control under the provisions of the Official Secrets Act.
- Private within the meaning and application of, amongst others, the Data Protection Act (2018 and as amended), GDPR, the Policy of the Information Commissioner's Office, or the Policy of the MoD in respect of the release of information to third parties.

12.9 Relationship with BFSAI Theatre Health & Safety Officer (THSO). The THSO is the authority for Health & Safety within the BFSAI Joint Operating Area (JOA), and therefore the relationship between QHM and THSO is critical. The following points are pertinent:

- All reports raised by ECP will automatically be referred to THSO;
- THSO will always be consulted for professional guidance and advice;
- Nothing in the ECP MSMS is designed or intends to conflict with guidance or procedures in the BFSAI Safety, Health & Environmental Protection System.

CHAPTER 13: QUALITY ASSURANCE & IMPROVEMENT

PMSC: … incorporate a regular and systematic review of performance based on information from monitoring of the system and independent audits…

13.1 Policy. QHM will monitor, review and audit the MSMS on a regular basis. Performance of the system will be assessed against internal performance indicators and, where appropriate, by benchmarking against other military ports that have adopted good practice through the Dockyard Ports Board. The MSMS is also to be reviewed at least annually by 'interested parties' including Port users.

13.2 Assurance Process. It is important that assurance regimes are a closed loop system, enabling the chain of command (management) an opportunity to respond to issues and rectify correctly. ECP adopts the following assurance regime:

- **Identify** an issue or area of non-compliance;
- **Report** it through the process directed;
- **Address** (adjust or amend the process/ hazard log/ risk assessment);
- **Record and report** action taken;
- **Reassess** the issue to ensure resolved.

13.3 Quality Management. Quality is about doing things right and is particularly important for East Cove Port in order to counter the negative effects of a high turnover of personnel. All personnel should embrace 'Quality'. Put simply, Quality asks 'are we doing what we believe we should be doing and are we doing what we must in order to support others?' This includes, for example, keeping ECP orders and procedures current and relevant to the mission. A regular process of internal reviews asks these questions and takes action wherever it is needed. East Cove Port operates in accordance with the PMSC first and foremost and also conforms with the BFSAI Quality Policy Statement.

13.3.1 **BFSAI Quality Manual**. The BFSAI Quality Manual provides the policy framework from which the acceptable standards of the BFSAI Quality Management System (QMS) within BFSAI can be achieved. It provides direction for how the QMS within BFSAI is regulated, how assurance is to be gained and provides the details of the organisation of quality management responsibilities between BFSAI and the relevant personnel involved in the Duty Holding chain.

13.3.2 **Level One Audit**. ECP conducts Self Audits of all documentation (SOPs, EOPs, Equipment Care etc). The aim of self-audit is to continually re-evaluate whether the port is complying and conforming to procedures laid out in higher regulation (e.g. JSPs), orders and local orders. The audit will generally be carried out once per 6 months and uses the Ports Ops Audit Form as its baseline. This ensures that all PMSC areas are reviewed. The level one audit should be conducted by incoming DQHM (SO2 Mar) at each turnover, with assistance from the QCIT cell within BFSAI.

13.3.3 **Naval Port Audits**. Captain Port Operations conducts a Level 2 compliance audit of ECP annually.

13.4 Equipment Care (EC). All land owned equipment is managed under the ELW Equipment Care Directive. This includes direction on management checks as internal assurance. EC meetings are conducted monthly and an external Land Equipment Assurance (LEA) visit is conducted annually. Part of the EC procedure mandates that a register is held of all competent persons. All personnel are to be competent on machinery before operation.

13.5 Joint Establishment Table (JET). QHM is to report to BFSAI WO J3 O&D details of any qualification shortfalls against the Joint Establishment Table which are enduring or cannot be managed at section level (ie 460 Port Troop and NEFI). This is used by BFSAI to highlight recurring issues and identify areas of concern to the Commander.

13.6 Fire Safety Management. The aim of fire safety management within ECP is to minimise the threat from fire to people, assets, operations and to the environment by ensuring that appropriate and effective countermeasures are both provided and maintained. The BFSAI Fire section provides all information on how to minimise risk, manage fire safety checks, Terms of Reference for Fire Safety Officers and deal with Fires if and when they happen.

13.7 Infrastructure Assurance.

13.7.1 All infrastructure in BFSAI is subject to oversight through CBF's Infrastructure Estates review with DIO and Mitie. This takes place every 6 weeks.

13.7.2 Infrastructure is locally managed by the SQMS SNCO for 460 (Port) Troop and the UHSO in NEFI. Should work services be required a job request or Electronic Statement of Requirement (eSOR) is submitted to the DIO. A central work services log is maintained by SQMS/UHSO which is updated when a job request is submitted. The job will be given a unique reference number and a target completion date. The following priority codes apply for target completion dates:

- P2 = 1 Day
- P3 = 1 Week
- P4 = 60 Days

13.8 MARNIS, Risk Assessment and Issue Log Reviews. Risks are discussed as an agenda item on the monthly Port Ops Meeting. Any additional hazards are added to the Risk Register or Actions and Issues Log and risk assessments updated accordingly. All risk and hazards are reviewed as described in Chapter 4. A separate review of MARNIS risks is to be carried out by maritime specialists ie QHM, DQHM, Chief Pilot, Tug Masters and CO FIPV.

13.9 Operating Procedures. ECP SOPs are lodged within the BFSAI SOP database. Each SOP has a sponsor who is responsible for reviewing on an annual basis to ensure currency and conformance.

13.10 Security. Security in the Port is detailed in the ECP Security Standing Orders[1]. A monthly return is submitted to the Physical Security JNCO in the Joint Service Police and Security Unit (JSPSU). Six monthly Physical Security advisory visits and Inspections are carried out by the JSPSU.

13.11 Internal Assurance

[1] Under Review as at Oct 21.

13.11.1 **FINWOP Planning Meeting.** East Cove Port holds a weekly planning meeting that is chaired by the DQHM to ensure all port personnel are aware of the programmed movement within the port for the coming week. The meeting is an opportunity for any issues to be raised between the monthly safety meetings and for these to be annotated in QHM's Action and Issue Log.

13.11.2 **Port Ops Safety Meeting.** The East Cove Port Ops Safety Meeting is held monthly with QHM as Chairman to confirm the safe and efficient running of East Cove Port. The main emphasis is Safety and Efficiency in and around East Cove Port for Personnel and the Environment. All accidents or near misses arising from either Wet, Dry, Engineering or Navigational tasks are discussed with focus on reducing Risk and making East Cove Port a safe place to work for all. The Port's MARNIS Log and dry side Risk Register are discussed during every meeting to identify any new hazards arising or control measures required. All risks owned or managed by QHM are reviewed.

13.11.3 **Pre-FIRS Ammunition Conferences.** The Pre-FIRS Ammunition Conferences are held within Port Ops HQ Conference room, chaired by the Q/F. The conference is held 1 week prior to the FIRS arrival at ECP. The aim of the Conference is to brief all internal & external agencies concerning the movement of ammunition from ECP to ASD & ASD to ECP.

13.11.4 **Occupational Health.** The health of all military personnel is reviewed regularly by the Defence Primary Health Care system. If a Service Person is not fully fit to carry out all of their normal duties a Light Duties Proforma or medical downgrade (App 9) is completed by a Doctor. Prior to deployment a medical risk assessment (App 26) is carried out for any downgraded personnel.

CHAPTER 14: RECORD & PUBLISH

PMSC: A Safety Plan illustrating how the requirements of the PMSC will be met should be published every 3 years. QHM must also publish an assessment of the Organisation's performance against the plan….

14.1 Policy. ECP acknowledges the requirement to publish a safety plan for marine operations at least once every 3 years. This plan will articulate how the port's policies and procedures will be developed and implemented to satisfy the requirements of the PMSC.

14.2 Compliance. ECP will report compliance with the PMSC to the MCA (via Captain Port Operations) to meet published deadlines.

14.3 Records. ECP will maintain due diligence records. This Marine Safety Management System is in itself clear evidence of care and commitment. The Navigation Risk Assessment, MARNIS, Risk Assessments and Operating Procedures all provide considerable further examples of how the safety policy has been put into practice.

14.4 Publication of Plans and Records. The published safety plan for marine operations will be reviewed annually with stakeholders to demonstrate ECP's commitment to maritime safety and to ensure the involvement of harbour users. It will commit ECP to undertake and regulate marine operations in a way that safeguards ECP, its users, the public and the environment. It will refer to commercial activities in the harbour, the efficient provision of specified services and the effective regulation of vessels. It will also explain how commercial pressures would be managed without undermining the safe provision of services and the efficient discharge of its duties. Although planned to be re-published every third year, any significant changes to the plan will generate an interim re-publishing.

14.5 Annual Report. An assessment of the port's performance against the plan will be published as part of the annual audit process. Information gathered from the monitoring and auditing of the MSMS will be used to support the analysis and conclusions. The report will cover the period of the financial year – 1 Apr-31 Mar.

CHAPTER 15 – GLOSSARY

ACOP	Agreed Code of Practice
ALARP	As Low As Reasonably Practicable
APT(S)	Atlantic Patrol Task (South)
ASD	Armament Storage Depot
AT	Adventurous Training
AtoN	Aids to Navigation
BAS	British Antarctic Survey
BFSAI	British Forces South Atlantic Islands
BRd	Book of Reference (Digital)
CALM	Catenary Anchor Leg Mooring
CBFSAI	Commander British Forces South Atlantic Islands
CHA	Competent Harbour Authority
COS	Chief of Staff
DD	Destroyer
DE&S	Defence Equipment & Support
DDH	Delivery Duty Holder
DH	Duty Holder
DIO	Defence Infrastructure Organisation
DMR	Defence Maritime Regulator
DP	Dynamic Positioning / Designated Person
DPB	Dockyard Ports Board
DPAB	Dockyard Ports Advisory Board
DPSMP	Dockyard Ports Safety Management Plan
DSA	Defence Safety Authority
DSC	Digital Selective Calling
DQHM	Deputy Queen's Harbour Master
DWR	Diving at Work Regulations
ECP	East Cove Port
ECPOC	East Cove Port Ops Controller
EOD	Explosive Ordnance Disposal
EOP	Emergency Operating Procedure
ESO	Explosives Safety Officer
FF	Frigate
FIG	Falkland Islands Government
FINAVWARN	Falkland Islands Navigation Warning
FINWOP	Falkland Islands Naval Weekly Operational Programme
FIPV	Falkland Islands Patrol Vessel
FMHU	Fleet Mobile Hydrographic Unit
FOD	Foreign Object Debris
FY	Financial Year
GAER	Government Authorised Explosives Representative
GMDSS	Global Maritime Distress & Safety System
GSGSSI	Government of South Georgia & South Sandwich Islands
HL	Hazard Log
HSE	Health & Safety Executive
IALA	International Association of Lighthouse Authorities

IAMSAR	International Air Maritime Search & Rescue
IMO	International Maritime Organisation
ISM	International Safety Management
JFC	Joint Forces Command
JNCO	Junior Non-Commissioned Officer
JOA	Joint Operations Area
JOC	Joint Operations Centre
JSP	Joint Service Publication
KPI	Key Performance Indicator
LNTM	Local Notice to Mariners
LOLO	Lift On-Lift Off
LPS	Local Port Service
MACR	Major Accident Control Regulations
MAIB	Marine Accident Investigation Branch
MARPOL	Maritime Pollution
MCA	Maritime & Coastguard Agency
MHNP	Mare Harbour Naval Port
MOD	Ministry of Defence
MoU	Memorandum of Understanding
MPA	Mount Pleasant Airfield
MRCC	Maritime Rescue Coordination Centre
MTTR	Mean Time To Repair
NEFI	Naval Engineering Falkland Islands
NRA	Navigation Risk Assessment
NtoM	Notice to Mariners
NW	North West
ODH	Operating Duty Holder
ORC	Offshore Raiding Craft
OSCP	Oil Spill Contingency Plan
OSR	Oil Spill Response
PEC	Pilotage Exemption Certificate
PMSC	Port Marine Safety Code
PONR	Point Of No Return
PSD	Petroleum Storage Depot
PSM	Port Services Manager
PTW	Permit to Work
QHM	Queen's Harbour Master
RA	Risk Assessment
RCC	Rescue Coordination Centre
RFA	Royal Fleet Auxiliary
RFIP	Royal Falkland Islands Police
RHIB	Rigid Hulled Inflatable Boat
RLC	Royal Logistic Corps
RN	Royal Navy
RORO	Roll On-Roll Off
RPF	Risk & Performance Forum
RRC	Rigid Raiding Craft
S&MO PT	Salvage and Marine Operations Project Team

SAERI	South Atlantic Environmental Research Institute
SALMO	Salvage and Marine Operations
SAR	Search and Rescue
SDH	Senior Duty Holder
MSMS	Safety & Environment Management System
SMB	Survey Motor Boat
SNCO	Senior Non-Commissioned Officer
SOLAS	Safety Of Life At Sea
SOP	Standard Operating Procedure
SPM	Single Point Mooring
SPOD	Sea Port of Departure
SPOE	Sea Port of Embarkation
SQEP	Suitable Qualified & Experienced Person
STRE	Specialist Troop Royal Engineers
TFHE	Tactical Fuel Handling Equipment
UKHO	UK Hydrographic Office
USRP	Unit Spill Response Plan
VHF	Very High Frequency
VTS	Vessel Traffic Service
VWG	Van Wijngaarden Marine Services