Maritime & Coastguard Agency

Offshore Petroleum Regulator for Environment & Decommissioning

The Secretary of State's Representative for Maritime Salvage & Intervention

UK National Contingency Plan: Exercise Phoenix Report

Author: P Lowson
Owner: L McAuliffe

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Approvals

Name	Title
C Hughes	MCA Director of HM Coastguard
W Kennedy	Executive Director, OPRED
L McAuliffe	Deputy to the SOSREP and Exercise Director

Distribution

Name	Title
C Hughes	MCA Director of HM Coastguard
W Kennedy	Executive Director, OPRED
Government website	https://www.gov.uk/government/publications

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1 Executive Summary

1.1 Exercise Phoenix was a multi-agency exercise involving Government departments, local authorities, the oil and gas industry and contractor organisations, and took place in June 2022 to test the United Kingdom's (UK) response to a major oil and gas industry incident within the UK Exclusive Economic Zone (EEZ).

1.2 The planning was well organised and productive, despite dealing with several challenges, particularly navigating resourcing and workload issues for many participating organisations and some reorganisation processes.

1.3 Previous National Contingency Plan (NCP) exercise reports were considered throughout the exercise planning process with recommendations, observations and areas of good practice noted to assist in the evaluation of continual improvement.

1.4 All cells[1] which were formally evaluated were considered during the scenario development and their role within the NCP fully tested.

1.5 The conclusion was the exercise aim "To test and verify the UK's National Contingency Plan for response to marine pollution from shipping and offshore installations, under hybrid working conditions" was met and while showing that the NCP was broadly effective, a number of areas were identified where further refinement is recommended.

1.6 The NCP is currently being reviewed and updated by the NCP Strategic and Tactical Working Groups and the learning identified within this report will be fully considered and incorporated where appropriate, with the objective of further improving the UK's response to a major salvage and/or environmental incident.

1.7 A summary of the online exercise feedback form, sent to all participants, is included in section 6.14. The general view of the submissions of this form is in support of the findings of the exercise evaluation team.

1.8 This report also acknowledges the support and feedback received from all participants and officials through the planning, execution, and evaluation of the exercise.

[1] As per the NCP, the term 'cell' in this report refers to any cell, unit, group, team, or similar grouping term used within the response to the exercise.

1.9 A key finding recorded during the hot washups and via feedback forms identified this exercise as providing a very realistic timeline which enabled excellent participation, and everyone involved are thanked for their role in achieving this.

1.10 All participants in the exercise had responsibility for their own and others' safety, and there were no reports of any injuries or damage to the environment during the exercise.

2 Exercise Director Summary

2.1 It has been 10 years since I was first involved in the NCP exercises, and I have been involved in everyone since. Whilst every exercise is unique in its scenario, the key to each one's success is down to good leadership and clear communication. This exercise did not disappoint, with strong leadership in each critical theatres of response and good communication. Had this been a real incident, I feel confident the UK and the Operator of the asset would have responded in a timely, reasonable, and acceptable manner.

2.2 This exercise brought hundreds of people together at various stages from across the UK; with teams physically in place in Shetland, Aberdeen, East Midlands, Doncaster, London, Southampton, and Fareham. The flexibility in response was a welcomed departure from the restrictions seen over the last two years.

2.3 This exercise was designed to harmonise the new way of working following the coronavirus pandemic. Prior to the pandemic, we would only mobilise teams in person, during the pandemic, we would only work remotely and following the pandemic we now have a hybrid of physical and remote working capabilities, with advances in technology supporting our ability to do this.

2.4 We have proven, through this exercise and recent incidents, that harmonising these two responses allows us to respond quicker, share information wider and make better use of resources, which is a very positive outcome.

2.5 UK Government are only able to successfully test the NCP with the help of a commercial organisation who is willing to not only dedicate time and effort into the planning and delivery of such exercises, but to also test their own response at a national level. I would therefore like to thank Harbour Energy, for their support, co-operation, and dedication to this exercise.

2.6 I am grateful for the opportunity to plan and deliver this project, but I did not manage this alone. I am very thankful to the planning team and their respective organisations, for their assistance throughout the nine months it took to prepare and deliver this exercise. I am also thankful to the exercise command team and their respective organisations, who helped to execute the exercise. And finally, thank you to all the participants, who worked tirelessly throughout the two days, to respond to the scenario presented to them. We honestly could not have done this without you.

Lisa McAuliffe

Exercise director

3 Introduction

3.1 The purpose of the NCP is to ensure there is a timely, measured, and effective response to incidents of, and impact from, marine pollution from shipping and offshore installations.

3.2 The UK must meet many national and international legal obligations to plan and prepare for pollution and salvage and the NCP addresses part of these obligations.

3.3 The owners and masters of ships and the operators of offshore installations bear the primary responsibility for ensuring that they do not pollute the sea. Port and harbour authorities are likewise responsible for ensuring that their areas operate in a manner that avoids marine pollution. All aforementioned are responsible for responding to incidents involving their assets within their area of jurisdiction.

3.4 However, ships, offshore installations and port and harbour authorities may face problems which exceed the response capabilities they can reasonably maintain by themselves and their contractors and UK Government may support the response using national assets.

3.5 The purpose of this report is to capture lessons learnt from the exercise and produce recommendations, observations, and areas of good practice for all participating organisations to consider adopting during an incident.

3.6 The NCP strategic and tactical groups will monitor the actions taken on all recommendations and observations, but it will be the responsibility of individual organisations to consider and develop any observations assigned to their own organisation.

4 Exercise Overview

4.1.1 Exercise PHOENIX was conducted in real time and continually throughout 15 and 16 June, including overnight, with key cells situated across the country.

4.1.2 Following on from the predominantly remote nature of Exercise CELTIC DEEP due to COVID-19, Exercise PHOENIX was conducted in a hybrid format including normal team mobilisation timings. Some were pre-mobilised to avoid lengthy delays due to travel but otherwise, it provided for a realistic response.

4.1.3 There was participation from over 200 individuals and 30+ organisations, with 10 cells being formally evaluated in line with their individual objectives (Appendix E).

4.1.4 The exercise was designed to activate the strategic, tactical and operational levels of the various response organisations.

4.1.5 The scenario included a requirement for Search and Rescue (SAR) in the initial stages of the exercise, which during the planning raised some concerns by participating organisations. However, it was widely accepted as being a positive inclusion and following the exercise, was considered a useful and realistic addition.

4.1.6 SAR was required due to an allision between a Platform Supply Vessel (PSV) and the Solan production platform, approximately 80 miles west of Sumburgh, Shetland. Personnel were rescued from the PSV before it sank and an injured person on board the Solan was evacuated to Shetland.

Figure 1: Simulation of SOST damage

4.1.7 Containers and drill pipes from the PSV impacted the Subsea Oil Storage Tank (SOST) resulting in a hole and an uncontrolled release of oil.

4.1.8 The timeline continued overnight although all cells stood down their physical involvement during the late evening of day one.

4.1.9 It is worth noting that during Exercise Phoenix, there was a live outbreak of avian flu. While not factored in to the exercise planning, this provided additional useful consideration and discussion within exercise cells.

4.2 Exercise Sponsor

4.2.1 Exercise PHOENIX was sponsored by the Maritime and Coastguard Agency's (MCA) director of HM Coastguard and the Offshore Petroleum Regulator for Environment and Decommissioning (OPRED) executive director.

4.2.2 The sponsor organisations were accountable for the delivery of the event and for ensuring lessons were captured, with commensurate corrective actions and solutions implemented across their respective organisations.

4.2.3 The exercise sponsors have no authority to direct other organisations to act on the recommendations made in this report. Therefore, observations have been made as an alternative for all NCP stakeholders to consider (see section 5.1.8).

4.3 Exercise Planning Team

4.3.1 The exercise director appointed for exercise PHOENIX was accountable to the exercise sponsors for the preparation and delivery of the exercise.

4.3.2 The core planning team (Appendix A) assembled by the exercise director to provide experience and expertise in key areas, included members from HM Government, namely the MCA, OPRED, Marine Scotland, Shetland Islands Council, the Department for Business, Energy and Industrial Strategy (BEIS) and the Department for Transport (DfT), as well as external organisations, including Harbour Energy.

4.3.3 Additional specialist input was requested on an ad hoc basis.

4.3.4 Most planning meetings were held remotely, on a monthly basis, from June 2021. Additional ad hoc meetings were arranged on specific topics, including visits to Shetland and the new premises of Harbour Energy.

4.3.5 It is noted that the planning teams of the past two NCP exercise were led by the same exercise director, partly due to the lack of any other volunteers.

4.3.6 In addition, no documented governance structure for current and future NCP exercises appears to exist. MCA and OPRED have responsibility for the NCP;

both organisations plan and take part in every alternate exercise, while those exercises focussed on shipping involve only the MCA.

4.3.7 Furthermore, the directorship of the past six exercises was fulfilled by a member of the Secretary of State's Representative (SOSREP) team. This will doubtlessly have contributed to the successful delivery of those exercises. However, it could also be seen as an impediment to the effectiveness of that team's response to the exercise scenario and can potentially negatively impact the realism of that response.

Recommendation 1: the NCP strategic working group appears to be best placed to take accountability for the planning of each national exercise and should consider assuming this responsibility. This involves appointing a suitable exercise director, who would be accountable to this group for a timely delivery of the exercise.

Observation 1: sourcing an exercise director from the SOSREP team can limit the realism for the team responding to the scenario.

4.4 Exercise Command Team

4.4.1 The exercise director established an exercise command team which included most of the planning team, plus additional members such as role-players, to assist with the execution of the exercise.

4.4.2 The exercise command team were physically located together in Aberdeen, with some team members supporting from remote locations.

4.5 Exercise Evaluation Team

4.5.1 The exercise director assigned a lead evaluator, who was responsible for the management of the evaluation team and for the production of this final exercise report.

4.5.2 The evaluation team was put together from a range of stakeholders, drawing on operational experience and knowledge of the NCP and multi-agency working.

4.5.3 This team was responsible for the evaluation of the key response cells during the exercise, in accordance with the agreed evaluation criteria, to determine to what degree the objectives for that cell had been achieved.

4.5.4 Further information of the evaluation process is detailed in Section 5.

4.6 Media Operations

4.6.1 Due to resourcing challenges for the MCA media team, the media involvement for the exercise was split in two parts, with the MCA team taking part on day one only.

4.6.2 It also resulted in the senior press officer requiring to double-up as a member of the planning team and an active player, which is not a satisfactory situation. This resource issue was raised following exercise Celtic Deep but has since gone unresolved.

4.6.3 It is noted that in the lead up to the exercise, a number of press officers departed the MCA leaving the Press Office short of resource. This was a contributing factor to the above although has subsequently been addressed.

Recommendation 2: adequate provision of resources should be made to ensure the MCA Press Office can play a full role in future major emergency exercises to ensure that no learning opportunities or areas for improvement are neglected. This should consider the wider impacts of the exercise and participating organisations reliance on MCA participation.

4.6.4 On day one of the exercise, students and staff from The University of Aberdeen provided media inputs to participants while on day two, written injects were prepared by Lowson Media.

4.6.5 As the lead agency, the MCA Press Office agreed a pre-exercise public press release with other participating authorities. The purpose of the release was to make the public aware that an exercise was taking place and thereby allay any public concern.

Recommendation 3: The high level of likely media interest in a major incident, including that of social media, should be more adequately represented in a future national emergency exercise of this nature. In addition, a senior representative of the MCA Press Office should participate either in the planning/command team for that exercise, or play their day-to-day role in that exercise, but not both.

4.6.6 Further information on the media response is contained in section 6.12.

4.7 Observers

4.7.1 Given the uncertainty of COVID-19, no physical observers were invited to this exercise.

4.7.2 The MCA had recently organised a Microsoft Teams call to allow observers to remotely view parts of a separate exercise. Given available timescales, it was not possible to arrange this for Exercise PHOENIX.

Observation 2: organising a virtual session for observers can provide a good overview of an exercise to a wide audience and should be considered for future exercises.

5 Evaluation Process

5.1.1 10 cells were formally evaluated as part of Exercise PHOENIX. The objectives for these are included in Appendix E:

- Marine Response Centre (MRC)
- Operations Control Unit (OCU)
- Scottish Environment Group (EG)
- HM Coastguard, including Maritime Rescue Coordination Centre (MRCC) Shetland, Joint Rescue Coordination Centre (JRCC) and tactical/strategic commanders
- DfT
- OPRED
- BEIS
- Shetland Islands Council
- Harbour Energy
- Multi-agency Media Response

5.1.2 The evaluation team provided a qualified and independent review of how each of these cells responded to the scenario, and how they each dovetailed into the NCP and other independent responding organisation's emergency plans.

5.1.3 The lead evaluator emphasised that the exercise was to be evaluated in a **fair** and **constructive** manner, using pre-prepared evaluation forms, to ensure a consistent format for the development of this exercise report and effective analysis of any common themes. Broad topics of Establishment of the Response Cell, Response Cell Operations, Communications and Teamwork were included on each form, with bespoke evaluation criteria listed for specialist functions.

5.1.4 While being a national exercise, with an official evaluation, the exercise and evaluation was conducted in a safe environment to ensure positive learning

could be achieved. Feedback was not requested for individual performance and instead concentrated on procedural improvements.

5.1.5 The lead evaluator and members of the evaluation team reviewed past NCP exercise reports prior to the exercise and during the compilation of this report. Of particular relevance, the recommendations and observations of Exercise CELTIC DEEP were considered, a number of which were noted as also being consistent to the findings from PHOENIX.

5.1.6 It is recognised that the NCP strategic and tactical working groups are currently updating the NCP and many recommendations and observations have been addressed following Exercise CELTIC DEEP. However, many remain open which has resulted in repeat issues during Exercise PHOENIX.

Recommendation 4: the NCP strategic and tactical working groups must work expediently with the MCA and OPRED to ensure recommendations and observations are fully addressed within an agreed timeframe of the exercise being delivered. Its recommended six months would be a suitable and acceptable period to deliver this.

5.1.7 Following a Good Practice observation from exercise CELTIC DEEP, an online feedback form was distributed to all participants. Elements from the responses are included throughout this report and a summary is provided in Section 6.14.

5.1.8 The evaluation reports received from each evaluator have been analysed, along with additional responses from other organisations and that of the online participant feedback. The outputs from these have been summarised in this report as:

Recommendation	A key item or area identified which would benefit from an improvement to further enhance the effectiveness of a response in the future, and which will carry recommended remedial action. Recommendations are not recorded against individual organisations with no direct link to the NCP[2].
Observation	A key item or area identified of particular note, but which does not come with a recommended course of action. All observations should be considered, with

[2] Organisations considered to have direct links to the NCP would generally include DfT, BEIS, MCA, SOSREP and OPRED plus NCP cells. In the case of NCP cells, a recommendation would only be included if it was pertinent to the operation of the cell as defined in the NCP, not of individual organisations represented.

	individual organisations responsible for any desired outcome.
Good practice	An item or area identified of particular benefit, which resulted in a positive response or contribution during the exercise, and should be encouraged in future.

5.1.9 A ‘hot wash-up’ was completed by the evaluators at the end of each day, to capture any immediate areas of concern, and for those after the end of day one, to highlight any points to be addressed overnight.

5.1.10 The Environment Group evaluator noted that for future exercises of a virtual nature, consideration needs to be given by evaluation roles to exploring the out of meeting discussions which may happen out of the formal meeting.

Lead evaluator comment: this is accepted, however, the difficulty in monitoring communications outside of formal meetings should be noted. The planning team discussed options for this during exercises CELTIC DEEP and PHOENIX, with no suitable or efficient solution identified. Considerations could include being copied into emails, added to team chat groups (e.g., on MS Teams) or joining conference calls. However, point to point ad hoc phone calls or conversations are not possible to evaluate, similar to challenges in monitoring every conversation occurring in a cell which is physically held in a room.

Evaluation

6 Evaluation Reports

The following reports are split by specific cells, but also summarise key areas such as exercise development, remote working, and human factors.

6.1 Exercise development and delivery

6.1.1 The evaluation of the planning, development and delivery of the exercise was completed by the lead evaluator, with consideration given to the results of the online feedback.

6.1.2 Following on from an observation from Exercise CELTIC DEEP, the planning team aimed to only include those who were not participating in the exercise. However, some of the team were still involved in the response, which did at times create falseness and uncertainty over roles and while may be unavoidable, is not recommended.

Observation 3: individuals participating during an exercise, who have been part of the planning or command team, or who are role-playing, can add confusion to the response and all endeavours should be made to keep these as separate roles.

6.1.3 The planning of the exercise was conducted in a timely manner and despite workload and conflicting priorities, was managed effectively.

6.1.4 MS Teams was used throughout the planning process and worked well, showing a definite improvement since CELTIC DEEP.

6.1.5 Participants of the planning team were highly effective at completing actions with particular recognition of the Harbour Energy representatives who contributed significant time into the exercise development.

6.1.6 However, outside of the planning team's control, there were some challenges in confirming arrangements of participating organisations, most notably of the MCA and OPRED. While these were resolved ahead of the exercise, it created extra workload and uncertainty remained until immediately prior to the exercise start.

6.1.7 It was noted that not all participating organisations could provide sufficient resource to take part fully in the exercise. Normal business and unexpected workload did have impacts, which is accepted as being unavoidable.

Observation 4: recognising the importance of these national exercises, participating organisations should suitably prepare and resource for them.

6.1.8 There was frequent resistance to the plan to incorporate SAR into the start of the scenario and to run the exercise overnight. However, feedback was unanimous in support of the benefits and realism this brought, and recognising that it added value, not a distraction.

Good practice 1: while not expected to be applicable in every scenario, including an element of SAR within the exercise provides a valuable realism and should be encouraged where applicable.

6.1.9 Harbour Energy were unexpectedly required to change their PSV company during the lead up to the exercise and despite a somewhat reduced participation, alterations were made without disruption.

6.1.10 Recognising good practice identified during CELTIC DEEP, an MCA SharePoint site was used for the sharing of all exercise documentation. This worked well, however, there were technical issues with access to this resource which might have been avoided with members reviewing the folder earlier in the process.

Observation 5: it is important to have all planning team members fully engaged in the process early, including with full access to the SharePoint site.

6.1.11 Logistics for the exercise, including the organising of travel and accommodation, was managed effectively by the exercise secretariat, ensuring all command team, role-players and participants were in place as planned.

6.1.12 All exercise participants were regularly briefed by the exercise director, ensuring relevant information was readily available and teams fully prepared.

6.1.13 Role-players were co-located with the exercise command team, which was very beneficial and effective resulting in the efficient coordination of the exercise and reaction to the developing situation was seamless.

Figure 2: planning discussions within the exercise command team

6.1.14 The exercise command team were very productive during the course of the exercise, with excellent use of flipcharts and briefings to ensure the exercise continued to progress in a realistic manner.

Good practice 2: having role-players co-located with the command team, with a sufficient number of individuals, greatly contributed to the successful delivery of the exercise.

6.1.15 Following learning from Exercise CELTIC DEEP, it was decided that rather than have several methods of communication for the exercise command and evaluation teams communicating i.e text message, MS Teams channels and WhatsApp, it was agreed that only WhatsApp would be used.

6.1.16 The use of WhatsApp by the command and evaluation teams was useful to ensure there was a regular and consistent method of coordinating actions.

6.1.17 Taking forward good practice from CELTIC DEEP, a command log was once again used during PHOENIX. This was effective at tracking activities, injects and response priorities and enabled everyone on the exercise command and evaluation to have full visibility of what was happening in each area of the exercise.

6.1.18 The exercise email address was used to good effect, however, there was not as many emails received as expected though this did increase on day two. It is noted as very beneficial to the command team to have oversight of communications, to assist in maintaining a strategic overview.

6.1.19 Whilst most participants did exercise in real time and use live logistics, there were some that did not. This had no impact upon the exercise, however, it nevertheless removed the added pressure that may be placed upon teams organising this during an incident e.g. flights, catering, pre-identified personnel etc.

6.1.20 It is appreciated that there is an element of ‘pre-exercise’ planning required, however, future exercises may wish to consider a more ‘cold’ response to explore this further

6.1.21 The planning team agreed on using real weather during the exercise, which provided realism to many elements which previously have not been explored before. However, it was noted at times that this may have contributed to inconsistencies with simulated observations and modelling outputs.

6.1.22 There was also a risk that the weather was not favourable on the day to satisfy certain objectives. This should be carefully considered for future exercises.

Observation 6: the use of real weather during the exercise may have been a contributing factor to confusion regarding some of the fictitious reports such as those from the aircraft.

6.1.23 The exercise planning and delivery was coordinated and executed on schedule with very few issues encountered.

6.2 HM Coastguard maritime operations

6.2.1 Via a national network of 11 coordination centres, HM Coastguard maritime operations is responsible for the initiation and coordination of civil maritime search and rescue within the UK's search and rescue region. In addition, and as one of six functions, maritime operations provide a 24-hour response and coordination service, to respond to pollution at sea within the UK EEZ.

6.2.2 The HM Coastguard operational response was from the MRCC in Lerwick (MRCC Shetland), with support from the JRCC in Fareham.

6.2.3 The lead evaluator, in discussion with the relevant evaluators, consider that while several learnings were identified, the HM Coastguard objectives for this exercise were met.

6.2.4 The initial information gathering phase was effective and the search and rescue mission coordinator (SMC) assessed the seriousness of the incident and declared a distress[3] based on sound rationale, utilising the appropriate distress phase checklist.

6.2.5 There was good discussion within the MRCC regarding the mission planning, including consideration of SAR resource requirements, and a timely briefing was provided to the duty coastguard tactical commander (TACOM).

6.2.6 The SMC was productive in seeking network support and requested the TACOM notified the duty counter pollution and salvage officer (DCPSO) and the offshore energy liaison officer (OELO).

6.2.7 The OELO was updated at timely intervals throughout the exercise and was available to provide support as required.

6.2.8 The TACOM completed their initial incident review within the required timeline of 30 minutes, which was complete and appropriate.

[3] From volume 2 of the International Aeronautical and Maritime Search and Rescue manual "A situation wherein there is reasonable certainty that a vessel or other craft, including an aircraft or a person, is threatened by grave and imminent danger and requires immediate assistance"

6.2.9 The SMC identified the need for suitable broadcasts on multiple communications methods, due to the distance the location was from shore.

6.2.10 Team briefings from the SMC were timely and effective, though at times they were over spoken by other team members.

Observation 7: regular operational briefings are important to maintain a common recognised information picture. Strict discipline should be adopted throughout, to ensure full understanding of the situation and account of actions.

6.2.11 The SMC maintained sound situational awareness throughout and requested further network support in the production of a search plan.

6.2.12 The TACOM maintained contact with the DCPSO and subsequently provided update briefings to the SMC. At an appropriate stage, the TACOM notified the duty coastguard strategic commander (STRATCOM), providing an accurate briefing.

6.2.13 Following the confirmation that all persons in distress had been accounted for, the SMC terminated the SAR phase of the response and downgraded the incident before continuing to provide support to the environmental response.

6.3 HM Coastguard strategic command

6.3.1 The evaluator, who was based at the JRCC, noted it would be a beneficial process to run a familiarisation programme for those expected to take part in the exercise, providing further preparation and learning.

Lead evaluator comment: this is accepted, however, as is referenced in 6.1.6, participating individuals and teams were not confirmed until immediately prior to the start of the exercise, with frequent changes of nominated individuals. There was also a casualty management workshop held for senior management in advance of the exercise. One of the functions of the exercise is to provide a safe learning environment and therefore, this opportunity should be maximised by providing suitable training prior to the exercise.

Recommendation 5: the MCA provide suitable training and refresher opportunities for all expected MCA participants of national exercises, to maximise the learning opportunity and where possible, extend the training to other officers.

6.3.2 The STRATCOM was notified at an appropriate time and began considering the strategic response to the incident, including notifying the duty operations director (DOD).

6.3.3 The DCPSO also contacted the DOD directly, however, it was noted that this should be relayed through the STRATCOM.

Lead evaluator comment: on the Coastguard Information Portal, in contacting duty personnel operational detail, the guidance is that the DCPSO or duty commander may brief the DOD but this appears to be not consistent or well understood.

Recommendation 6: the MCA should make it clear within command and control plans, what the reporting expectations are for commanders and duty officers.

6.3.4 The DOD operated at the correct level and did not interfere with strategic or tactical decision making.

6.3.5 Meetings were held at appropriate times and agendas were used, however, not on all occasions. This creates a risk of important items being overlooked.

6.3.6 Commanders need to quickly determine the powers, policies and procedures being used, or to be used, to respond to an incident so that other agencies and services can be made aware of these. This can clarify why actions are being taken, or not taken, and remind responders of relevant legal and operational processes that are to be used.

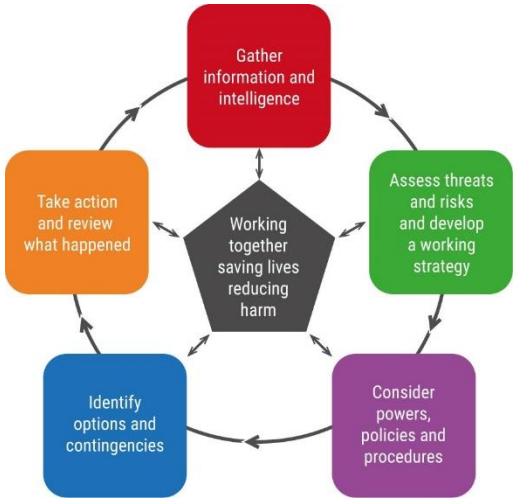


Figure 3: Joint Decision Model

6.3.7 During meetings, members need to ensure that address lists are developed quickly and confirmed so that information is shared with everyone who needs it.

6.3.8 There is a desire for a meetings rhythm to be agreed early in an incident and, as far as possible, for those to be maintained and appointments set.

Recommendation 7: HM Coastguard to train and exercise regularly using JESIP or other agendas and include the joint decision model (JDM) in operational response.

6.3.9 A major incident was declared by HM Coastguard, with significant discussion leading up to this declaration. This included conversations related to what impact there was on HM Coastguard and whether other organisations would consider it a major incident.

6.3.10 There was also positive conversation relating to the standing down of the major incident and at what point this should occur, considering both SAR and counter pollution.

Lead evaluator comment: it is noted that there is some difference in terminology between a tier 3 incident and a major incident. A tier 3 incident may lead to a major incident being declared, but it is not a guarantee, and both may exist in their own rights.

Observation 8: given the level of discussion relating to a major incident, additional awareness training may benefit the MCA decision makers in future multi-agency scenarios, specifically regarding a threshold for declaring a major incident, the requirements for downgrading a major incident and whether a strategic/gold group can stand down while a major incident is still declared.

6.3.11 HM Coastguard should ensure that functional work sharing occurs in such incidents e.g. a team be identified within the national network, ideally away from the engaged MRCC. The aim of this support would be to provide counter pollution (or other function) information gathering and sharing so that the engaged MRCC is not overloaded and to ensure that urgent and time critical counter pollution detail is prioritised and actioned.

6.3.12 Internal HM Coastguard and MCA discussion could be had about the overall command of a counter pollution incident, which is currently run as a collaborative process with no one in overall charge.

Lead evaluator comment: as noted in 1.6, the NCP is being reviewed and the 3Cs project[4] is considering coastguard command, control and coordination. The response to counter pollution incidents will be included, however, it is noted that the nature of major counter pollution response may not be appropriate for a single individual with ultimate responsibility.

6.3.13 The CPSO gave briefings and explanations to coastguard commanders in layman's terms so that there was good understanding of what was happening and going to happen in the counter pollution response.

Good practice 3: all individuals involved in a response should explain any and all technical processes and language so that all relevant players understand.

6.3.14 There is operational advantage to the use of MS Teams or equivalent for operational conversations between groups or players. This reduces phone calls

[4] 3Cs is an internal MCA project considering the command, control and coordination elements of HM Coastguard during major and complex incidents.

between those players with the added benefit of images and document links being able to be shared on this media. Records can be made by copying and pasting message pages into documents which can then be kept for post event enquiries or reviews.

Lead evaluator comment: any use of messaging services such as MS Teams must be in accordance with an organisation's IT policy, particularly in relation to retention periods and the sharing of official documents.

6.3.15 With the introduction of new technology, allowing for a remote response, there no longer appears to be a requirement to be physically in a location to run / lead all responses.

6.3.16 There is a massive benefit from holding virtual meetings and briefings with no travel required, faster response by individuals who can join from home and reducing time required for officers having to walk back and forth between rooms to brief groups.

6.3.17 Coastguard Liaison Officers (CGLO) are rarely going to be available to physically attend an NCP cell. Therefore, ways for a CGLO to 'attend' these groups remotely and virtually should be developed.

Recommendation 8: HM Coastguard and SOSREP should refine their requirements for CGLO's within relevant response teams to ensure procedures for them attending meetings, both virtually and in person, are established.

6.3.18 The MCA Operations Support team are seen as a key group of people to organise administrative matters for these types of incidents. Having a team that can organise meetings, arrange for locations to be opened, etc. is critical to enabling operational people to focus on their primary functions and tasks.

Lead evaluator comment: this has been raised in previous exercise reports and equally applies to other teams such as media response. Support should be sought from across the MCA or where possible, contracted external resource.

Recommendation 9: HMCG to consider how operational support are tasked in the event of a major incident.

HM Coastguard need to consider how they will share workload of commanders and others for any protracted incident. There is a need to identify resilience and, where possible, having two officers working back-to-back to ensure effective hand over.

6.3.19 HM Coastguard were not aware of the building significant media interest during Exercise PHOENIX and therefore it is recommended that the MCA media team informs and updates HM Coastguard at frequent intervals. This is to ensure that the coastguard is aware of the risk of media attempts to gain information directly from SAR resources or MRCCs and to be aware of the need to guard against and be given early warning of media intrusion.

6.3.20 At one point a press conference was arranged for an inconvenient time for operational meetings and therefore the MCA media team need to liaise and coordinate with relevant commanders to ensure both can be accommodated.

Lead evaluator comment: while 6.3.19 and 6.3.20 are supported, it was also noted during Exercise PHOENIX that the MCA media team were not initially included within the internal strategic meetings, which would have improved this communication link. Additionally, it is important to recognise that press conferences may often be planned to meet key media deadlines and therefore while operational requirements should be accommodated, this may not always be possible. Media is covered further in section 6.12.

6.4 Department for Business, Energy and Industrial Strategy: Offshore Petroleum Regulator for Environment and Decommissioning

6.4.1 OPRED contributed to the evaluation of Harbour Energy and the OCU, however, they also provided self-evaluation of the BEIS response to the exercise.

6.4.2 In the event of a significant pollution incident, OPRED may set up an Incident Briefing Room (IBR). The purpose of the IBR is to facilitate the flow of information relevant to the incident, from a BEIS perspective between the Responsible Person or the OCU and Emergency Response: Capabilities and Operations Team (ERCO).

6.4.3 This exercise provided an opportunity for OPRED to involve the IBR, something which has not been tested for many years. Whilst there are opportunities to strengthen processes, it was able to execute the tasks expected of it as detailed in the Incident Response Manual (IRM).

6.4.4 There was some initial confusion regarding when an IBR may be formally stood up and who has the authority to do so. However, when the IBR was mobilised, meetings were held at reasonable times and managed and chaired effectively.

Recommendation 10: OPRED and ERCO should review their response documents and refine the process for when ERCO should become involved during an incident.

6.4.5 Whilst the meetings were run successfully, it would be beneficial to review the interfaces between ERCO and OPRED to establish meeting etiquette, best practice for stand ups and other means of keeping each other updated such as shared logs and action trackers.

Recommendation 11: a review of the response document for the IBR would be beneficial and should include guidance on mechanisms for ERCO and OPRED to interface effectively.

6.4.6 Actions and pertinent information were circulated after the meeting by email.

Good practice 4: circulation of actions and pertinent information following meetings was very useful to both parties and OPRED should also consider providing administrative resource to the IBR to support this function.

6.4.7 In the early stages of the response, there were periods of time when no information was passed from the Incident Management Team (IMT) inspectors to the IBR due to the high number of competing demands on the IMT inspector's time.

6.4.8 In a real incident, especially in the early stages when the volume of information being assimilated remains high and is constantly evolving, the provision of information from the IBR will prove difficult, primarily as the inspector may feel that they are not in a position to pass on the full picture as they await further updates. This issue was overcome by mobilising an additional inspector and organising regular briefings which is seen as a positive response.

Recommendation 12: OPRED should consider the best way to communicate information in a timely manner, be it through contemporaneous updating of logs, telephone calls, MS Teams chats or a combination of these. This may be best achieved by setting up a working group of those involved in the exercise to allow them to share experiences on the challenges faced during the exercise

6.4.9 The IRM identifies that the OPRED policy bronze should be the main communication channel with the inspectors at the IMT. It was noted that the OPRED policy silver took on responsibility for some of this communication while also overseeing the response to the family liaison aspect of the exercise. In a real incident, it would not be sustainable for policy silver to head up an IBR, maintain communication with inspectors and manage family liaison aspects.

Recommendation 13: OPRED should consider the roles policy silver and policy bronze played in the exercise to ensure that tasks are distributed amongst other colleagues to ensure policy silver is not overloaded.

6.4.10 Inspectors also found the information requests made of them to be difficult to manage at times, particularly in the early phase of the response. Moreover, the inspectors may not have fully appreciated the significance of providing information in a timely manner once the IBR was established.

Recommendation 14: Colleagues throughout the response structure may benefit from a discussion so there is an understanding of why it is challenging to provide information from an IMT to an IBR, but for those involved in the IBR to explain why it is important to receive timely information to allow ERCO to deal with the pressure from SpAds and Ministers.

6.4.11 The only information the IBR (and through the IBR, the wider department) received directly from the SOSREP was as a result of a phone call from the IBR lead to the SOSREP at the end of day one and the SOSREP sitrep issued in the early hours of day two.

Recommendation 15: OPRED should consider how communications with the SOSREP are improved such that there is awareness of significant events involving the SOSREP, such as the press conference.

6.4.12 The IBR was unaware of the SOSREP being involved in a press conference on day one, timings or content of meetings between the SOSREP and operator, the fact that the SOSREP was using their own technical advisor rather than one provided by OPRED using the established contract or when an OCU was going to be called.

Evaluator comment: communication between the SOSREP and the on call OPRED inspector was reported as being effective in other reports, which appears to contradict the above comment.

Recommendation 16: OPRED should discuss with the SOSREP to understand why the Independent Specialist Technical Advisor (TA) was not sourced as per the method detailed in the IRM, and if this approach is to be adopted going forward any role OPRED will have in assessing the technical suitability of TAs appointed by the SOSREP.

6.5 Department for Business, Energy and Industrial Strategy: Emergency Response Capabilities and Operations

6.5.1 Part of OPRED's internal role is to provide information to the BEIS ERCO team who would, following a significant pollution incident, establish their Emergency Operations Centre (EOC) at the BEIS 1 Victoria Street (1 VS) office in London. The role of ERCO is to gather information from OPRED and wider cross-Government sources and consider the potential impacts on the UK as a whole and provide briefings and SITREPS to ministers and Cabinet Office Briefing Room as required.

Observation 9: it was observed during the exercise that several participating organisations were not familiar with the role of ERCO, which may have contributed to some of the points raised throughout this section.

6.5.2 The BEIS evaluation included that of the interaction between the ERCO team at the EOC in London and OPRED in Aberdeen.

6.5.3 The OPRED duty inspector was notified of the incident in good time, who in turn informed the SOSREP and contacted BEIS communications.

6.5.4 ERCO was then notified via email which included a request for further conversations via telephone.

6.5.5 Upon notification of the incident there was a conversation between the strategic adviser and ERCO to understand the current need for ERCO's involvement and if there was a need to set up the Emergency Response Team (ERT) structure. This conversation proved useful in reaffirming what the trigger would be for an ERT and the roles and responsibilities of OPRED's IBR and ERCO in a response. This provided a clearer picture to those in the exercise of what the thresholds for activating an ERT are.

6.5.6 It was emphasised that ERCO would like to be given a 'heads up' of any incident which has the potential for hitting the thresholds for triggering an ERT and are open to discuss next steps, as happened in this instance.

6.5.7 Participants recognised that often initial information flows from the operator (Harbour Energy) to the OPRED on-call inspector at the beginning of an incident can be slow. This is due to the time taken to mobilise an inspector to the operator's site and for the inspector to gain situational awareness upon arrival to the operator.

6.5.8 At the beginning of the exercise there was an issue with getting a consistent flow of information from the OPRED inspector who had been mobilised to Harbour Energy back to the IBR. The resource deployed was not sufficient to manage and triage the high volume of information being provided by the operator during the initial hours of the incident. This meant that the information the IBR were feeding back to ERCO was not always the most up to date. This led to the decision by OPRED to mobilise a second OPRED inspector. This resulted in a notable improvement in the detail and frequency of situation updates.

Recommendation 17: OPRED should outline in the Incident Response Manual (IRM) the minimum resource requirements to manage large volumes of information during the initial hours of an incident. The IRM should outline what information should be prioritised to be triaged back to the IBR to maintain a consistent flow as well as outlining the rhythm for the mobilised inspectors to feed information back to the IBR. In addition, the IRM should outline the thresholds for allocating additional resource.

6.5.9 During the initial stage of the response and when the IBR is collating information for the first SITREP, it was not clear on the scale of the spill. However, once clarified, the situational awareness was well maintained throughout the rest of the exercise.

6.5.10 The ERT were operating between 1VS in London and Aberdeen, however, OPRED did not have sight of the action log, daily rhythm and organogram that were displayed in the 1VS EOC.

6.5.11 Participants noted that the incident notifications that were sent from the IBR to the ERT, which held the most recent information for the SITREP, were confusing at times. It would have been beneficial if out of date information had been removed rather than highlighting new information in the notification updates. However, overall, the products that were produced by the ERT throughout the exercise were to a high standard and were the correct tone for the audience.

Recommendation 18: the logistics cell[1] should maintain best practice for remote workers of sharing SharePoint folders and documents with those who are not based in the 1VS EOC, to improve the operationalisation of the response to aid communication of the products required, the deadlines and daily rhythm. This should be reflected in the Incident Response Manual.

[1] Forms part of the BEIS ERT, responsible for ensuring the EOC is fully functioning and have the resources that they need to manage the response.

Recommendation 19: OPRED to review how information is filtered to ERCO and how to submit incident notifications in a format which can be easily translated into the SITREP. In addition, consider renaming the incident notification so that the title is not conflated with the initial notification received at the outset of the response. ERCO should also ensure that commissions are clear and outline the information that Is required.

6.6 Shetland Islands Council

6.6.1 Initially, it was the intention to evaluate the response to the incident from Shetland Islands Council at a strategic and tactical level, however due to staffing issues and sickness this was confined to the Strategic Response only.

6.6.2 The evaluator, who was based in Lerwick, would like to extend a thank you to Shetland Islands Council for their hospitality and assistance during the delivery of this exercise.

6.6.3 Within the context of this evaluation, it is important to note that Shetland Islands Council were in the process of reviewing their Major Emergency Plan and Oil Spill Contingency Plan.

6.6.4 All cell team objectives were achieved with the exception of the following:

7. To exercise officers in their role at Strategic, Tactical and Operational levels, responding to a marine pollution incident impacting on Shetland.

As highlighted, due to several factors, the evaluation was confined to the strategic cell only. That said, there were elements of the tactical cell involved in the exercise, such as the deputy harbour master; and in operational response such as the Shoreline Clean up Assessment Technique teams who deployed to one of the identified areas.

9. To test overnight resilience of the response.

This was not tested in this evaluation.

<u>Establishment of Response Cell</u>

6.6.5 Given the foregoing, the evaluation took place in respect of the strategic cell only. A battle rhythm of meeting order was quickly identified, reviewed and amended as necessary.

6.6.6 The meeting order involved internal stakeholders including the council leader, convenor, head of harbours and wider elected members and strategic council

directors and managers. Externally, this extended to members of the Shetland Emergency Planning Forum (SEPF), head of cells, SOSREP and media together with the platform owners.

6.6.7 The media co-ordinator was present throughout to offer advice and guidance to the strategic lead.

6.6.8 It was obvious that as a small team working within a Local Authority, staff were comfortable, respectful and understanding of the roles of others.

Response Cell Operations

6.6.9 With any incident, the flow of information will continue as cell members are engaged in other duties. It is important that key information is captured and that formal internal briefings take place to ensure shared understanding. Within the cell, information continued to flow as key participants were engaged in other areas of the response. On their return, there were exchanges of information, however, not all the team were present to ensure situational awareness.

6.6.10 Shetland Islands Council are a small Local Authority and during any live incident, key staff will be keen to engage in the incident response regardless of its duration. Mention was made of mutual aid which had previously been used during the Braer incident in 1993. It was evident that the experience of those present in that incident would continue to influence the council's response.

Good practice 5: utilising the experience of key staff is valuable and should be encouraged

6.6.11 The Shetland oil spill contingency plan is currently under review and is awaiting formal sign off. Within the copy provided, there is mention of strategic priorities and agendas, however, this was marked as a draft copy and therefore it was unclear as to what was contained within these sections. The council should ensure these issues are addressed within the final iteration of this document.

Observation 10: the Shetland oil spill contingency plan is in draft and unclear on strategic priorities and agendas which should be considered in the final version.

6.6.12 Following the pandemic, Shetland continues to benefit from economic activity and tourism. At the time of this exercise, accommodation and transport were not widely available. Given the logistics experienced during the Braer and which would be prevalent during any oil pollution incident, the council may wish to

carry out further work to map issues, options and contingencies which could be used to support an effective response.

Observation 11: Shetland Islands Council could consider an exercise to map logistics, economic and community resilience issues following this exercise

Communications

6.6.13 There was evidence of communication across all levels including the use of email, mobile and fixed line communications, MS Teams and WhatsApp. There was some confusion surrounding the authorisation of WhatsApp on council owned devices and therefore clarity should be obtained on whether this is a means of communication which will be adopted by the council during an emergency or event.

Observation 12: Shetland Islands Council consider the formal use of WhatsApp during an emergency.

6.6.14 In the planning of the exercise, media colleagues were introduced to TRELLO project management software which was used to control media interjects during the exercise. It was thought that there was insufficient awareness of this software and unfortunately the training provided did not meet the needs of those using this within the council. As this is not thought to be a system specifically used for media management, there is no further recommendation other than the council may choose to explore this as an opportunity in future.

Lead evaluator comment: TRELLO was used in this exercise to mitigate media resourcing challenges and is not representative of how a live incident would be managed. Media is expanded upon further in section 6.12.

6.6.15 The strategic incident cell was set up physically within the Emergency Planning Unit office. This office was equipped with wall mounted televisions, projectors, monitors, cameras and laptops. It was acknowledged that some of this equipment requires upgrading and indeed some issues were experienced with equipment not functioning correctly or with compatibility issues.

Observation 13: Shetland Islands Council should consider the upgrade and location of equipment which would be used in response to an incident.

6.6.16 In a similar vein, staff within the incident response were trying to overcome the IT issues at the same time as dealing with the incident. There was a delay in resolving this and could have been supported by providing a dedicated IT resource to any incident.

Lead evaluator comment: utilising dedicated IT response was noted in the Exercise CELTIC DEEP report as good practice and therefore is fully supported as an observation for the council.

Observation 14: Shetland Islands Council to consider a secondment of an IT specialist to incident support.

6.6.17 Excellent use was made of a member of support staff who worked tirelessly in recording all the communications coming into the cell. The sheet, entitled Emergency Plan Log Sheets does not capture actions, policy nor decisions. Initially, mention was made of recording actions on a flip chart, however, actions were not recorded in this format. All meetings were minuted and any actions would appear within these, however, experience dictates that with time and incident pressure actions, decisions and policy logs should be captured within plans. Any actions should be SMART[5] and allocated appropriately.

Observation 15: Shetland Islands Council to consider the use of a dedicated action, policy and decision log in respective plans and response.

Teamwork

6.6.18 During discussion, the team acknowledged the difficulties in providing a full response to the exercise whilst trying to manage abstractions to relevant players. The absence of the chief executive at a strategic level and the harbour master at a tactical level resulted in those roles being undertaken competently by others. It was felt there was an opportunity to formalise arrangements in respect of the deputising for the chief executive on a rotational basis. Given the size of the council, single points of failure in terms of staffing will remain a constant challenge.

Observation 16: resilience at Shetland Islands Council was stretched, as became apparent when individuals not intending to respond to the exercise were required to do so. Appreciating the constraints on the size of the council, consideration could be given on how best to provide relief in some key areas.

6.6.19 As expected, there was a strong ethos of co-operation internally with the acting chief executive, executive manager for governance and law, media co-ordinator and resilience advisor receiving and responding to the interjects. They were assisted, as required, by other staff from within council services.

[5] Acronym for setting goals and objectives - Specific, Measurable, Achievable, Relevant and Time-bound

6.6.20 The SEPF was also activated, which is a multi-agency Emergency Liaison Group formed under the Civil Contingencies response. This met on several occasions throughout the exercise.

6.6.21 At times, the issues discussed in this forum were tactical and operational with a very broad audience. As was highlighted, the chief executive had deployed a tactical response during the response to the pandemic and it was thought that this would be written into the council's Major Emergency Plan. The council may wish to consider this further in light of the relationship with SEPF and review attendance at this forum and its function.

Observation 17: Shetland Islands Council to consider the formation of a tactical cell during incident response and appropriate representation at Shetland Emergency Planning Forum meetings.

6.6.22 On day two, there was a meeting of the council's Corporate Management Team[6] which was held virtually and well attended. It was accepted that during a live incident, council services would have been alerted through media or other sources to the pollution event. However, forming a strategic cell is crucial to determining the council's priorities and ensuring the tactical response has the resources to carry these out. Accordingly, consideration could have been given to setting these priorities, ensuring shared understanding and engagement earlier to enable these to be considered more fully in anticipation of the meeting.

6.6.23 The strategic and tactical cells of the council's response must be appropriately resourced with administrative support to ensure decision making is recorded and administrated appropriately.

Observation 18: Shetland Islands Council should consider reviewing the administrative support to incident response within the review of relevant plans.

6.6.24 New structures, such as community resilience forum, business resilience forum together with community safety and resilience board would have been activated during this incident. In addition to the mapping of these against any response, a training needs analysis should be carried out alongside the review of the relevant response and plans and including these fora, to ensure council officers or members are appropriately trained.

[6] The Corporate Management Team forms SIC's strategic response cell

Observation 19: Shetland Islands Council to consider carrying out a training needs analysis for incident response in line with a review of relevant plans.

6.6.25 During the review of the council's major emergency response arrangements, considerations should be given to the existing groups that will be used in those arrangements. Each group will be required to be serviced.

6.6.26 Groups such as community and business resilience groups had been formed during the pandemic response which were overlain against more traditional groups. As an incident develops, due caution will require to be exercised to ensure if engagement is made, it can be sustained for the duration of the incident.

Additional Technical Elements

6.6.27 Overall performance in this area was very good.

6.6.28 There was continuous dialogue between the acting chief executive and the media co-ordinator surrounding an initial media holding statement, the local media briefing and notional local media briefings.

6.6.29 On day two, the acting chief executive took part in the media briefing serial. During the subsequent exercise hot debrief, the exercise media lead expressed his compliments to the Shetland representative for the manner in which he had addressed the issues within the briefing.

6.6.30 During discussion, it was established that the Council does not have a Tier 2 response in place for its coastline response although steps were in hand to address this. Nonetheless, staff were confident of being able to secure a suitable response from a Tier 2 provider. The necessary contract should be expedited to ensure the council can adequately escalate its response options.

Observation 20: Shetland Islands Council should ensure a tier 2 response is in place.

6.6.31 Engagement with the operator was good throughout the exercise and evident at a strategic and tactical level. Those present were very aware of the challenges of operating in the waters around Shetland and the challenges this brings. This formed part of the response by the strategic lead during the media briefing.

Good practice 6: Shetland Islands Council exercise players across the agencies provided a good response to a credible exercise scenario which was acknowledged in the hot debrief.

6.7 Scotland Environment Group

6.7.1 The EG had an evaluator and a directing staff member, who were co-located with the command team in Aberdeen, albeit their evaluation of the EG was all remote.

6.7.2 The evaluation team for the EG were in agreement that objectives were achieved and noted that overall success of the exercise was in large due to the scenario being of a nature to enable enough discussions to happen in real time and was extremely reflective of a real incident.

Establishment of the Response Cell

6.7.3 Formal activation of the EG was received from the SOSREP via the CPSO once oil pollution was discovered. A heads up was received beforehand from the MCA environmental scientist to the Marine Scotland Duty Officer (MSDO) that a SAR incident had occurred and then from MSDO to the Joint Nature Conservation Committee (JNCC) / NatureScot (NS) duty officers.

6.7.4 Once formally activated, the meetings were quickly established using MS Teams with all participants able to join, with the exception of those unable to take part in the exercise.

6.7.5 There were an appropriate number of meetings held during the exercise, with four meetings in total with the addition of sub-groups established including ones for dispersants, monitoring and wildlife.

6.7.6 The chairs of the EG had been pre-identified for the exercise. The role was undertaken well by both chairs and to good effect on both days, with clear understanding of roles and responsibilities.

6.7.7 Prior to the initial meeting, written guidance on the roles was shared prior to the meeting, followed by the chair using this to remind members at the start of the meeting.

6.7.8 Admin support for the EG was provided by the chair's parent organisation.

6.7.9 The details of the initial call between the MSDO and EG chair considering the incident type was shared with EG members during the initial meeting.

6.7.10 Although Marine Scotland has guidance on the role of the chair and for their duty officers, there is no multi-agency Standing Environment Group plan/

guidance available for other EG members, detailing each organisations' roles and responsibilities.

Observation 21: the creation of a multi-agency Standing Environment Group plan/ guidance for all EG members may be beneficial over and above Marine Scotland guidance for their duty officers and EG chairs.

6.7.11 The evaluation team recognised the EG as a well-versed group with clear knowledge and understanding of requirements and providing good support.

6.7.12 All information within the EG was shared via email which may not have been sufficient for organising all the paperwork related to an incident.

6.7.13 Other than email, no commonly accessible platform such as Resilience Direct or equivalent was available for all members to access. Having a common depository, to store correspondence, or to keep a common operating picture/ status/ action log should be considered.

Lead evaluator comment: whilst during this exercise, discussions between the two chairs resulted in them agreeing which email mailbox to use and who would store documentation, this should be formalised through a common operating platform

Observation 22: the use of a common shared system for all EG members to have access to the EG operational guidance response plans / templates ensures resilience in delivery of the function of the EG, whilst always enabling common access to all members

Response Cell Operations

6.7.14 The frequency of EG meetings was good, run to time or mostly with members allowed to ask questions and make comment, treated courteously and tasked clearly. Timing of meetings were also scheduled around other NCP meetings.

6.7.15 Some flexibility may be required for avenues of discussion/ actions which might require slightly longer conversations. There was agreement by all parties involved to extend meetings where this occurred, which was positive.

6.7.16 A portion of each meeting on day one was given over to briefing new members of the group on the situation, limiting time for the main agenda.

Lead evaluator comment: the observation suggested for this comment has been incorporated into Observation 22.

6.7.17 Briefings were accurate with suitable notes being taken and the action log clearly identifying the lead for each action.

6.7.18 Many tasks were assigned to one individual due to an EG meeting reaching the planned end time, therefore unable to complete the review of actions arising. The number of tasks could have proved overwhelming for less experienced members.

Observation 23: the EG consider the volume of actions being assigned to individuals and ensure a review is held on the capacity of delivery, or if support could be provided from across the wider group

6.7.19 There were no deadlines on actions agreed during meeting or assigned post meeting, resulting in open ended actions and therefore no structure or importance criteria being assigned.

Observation 24: the EG consider agreeing action deadlines when they are assigned, to ensure focused delivery and prioritisation on importance.

6.7.20 The action log and advice notes were all distributed with the agenda being referenced at each meeting and members were requested to ensure the EG admin were aware when actions had been completed.

6.7.21 Environmental issues were discussed freely and openly, including sensitivities which oil might impact over time such as discussing wildlife response, dispersants and monitoring.

6.7.22 The EG tested the handover of chair role between day one and two, from Marine Scotland to NatureScot. This was a seamless transition and did not impact the delivery of the EG.

6.7.23 It was evident the chairs had different style of delivery, but this did not have any operational impact and the EG members demonstrated respect for both chairs and were engaged and dynamic in their response.

6.7.24 Whilst the handover was well done and to an individual who had clear knowledge and experience of EG incident response, there is no guidance or documentation available either as an EG or within NatureScot.

6.7.25 Requests were made to each organisation to ensure continuation of staffing as part of resilience planning.

6.7.26 All attendees demonstrated proactive engagement with free and open discussion regarding environmental sensitivities.

Good practice 7: the EG evaluator noted that all EG members should be commended for the engagement and enthusiasm in delivering their roles during the EG operational response cell, which ultimately supported the successful operation of the cell.

6.7.27 No operator environmental representative was invited to the first EG meeting. No other witnessed communication took place prior to an operator representative attending the second EG meeting due to the virtual nature of the EG.

Lead evaluator comment: it is noted that an operator representative is not a standing role within the EG and would only be in attendance on invite.

6.7.28 Within the constraints of remote evaluation, no interaction appeared to be happening on day one between the operator environmental cell and EG albeit this changed during day two.

Lead evaluator comment: it has become apparent that, within industry, the role of the EG may have become confused from the intended function as outlined in the NCP. See Recommendation 20 at the end of this section.

6.7.29 There were good examples of preparedness including guidance notes for the MSDO, pre-set agenda, roles and responsibilities documentation and the EG advice note formats.

6.7.30 The EG advice notes and dispersant permissions being prepared quickly and updated regularly with additional info as requested, were provided in a timely manner.

Good practice 8: the EG having pre-set agendas, guidance and documentation, prepared and updated regularly, were provided in a timely manner assisting in the efficient operation of the group.

<u>Communications</u>

6.7.31 The chairs of the EG reacted in a calm and professional manner which enabled the group to work proactively and productively.

6.7.32 Both chairs were considered, inclusive and clear with tasking and followed up by email any items that were not covered during the meetings.

Good practice 9: the EG chairs were proactive in ensuring inclusion, with all members having an opportunity to contribute.

6.7.33 The initial call out was done according to the NCP and standard pre-prepared documentation was used to provide advice for other cells.

6.7.34 Various appropriate communication methods were used during the exercise duration including MS Teams, email and mobile phones.

6.7.35 An OCU meeting was held on day two of the exercise which the EG attended by the EG Liaison Officer (EGLO) role. The individual who attended demonstrated exemplar liaison skills and attributes, providing key updates of information using appropriate terminology in a succinct manner.

Good practice 10: the delivery of the EG liaison officer role is considered a model example of this role and should be commended.

Teamwork

6.7.36 Effective chairing, allowing all members to participate, delegating and tasking was clear and parties understood expectations.

6.7.37 The EG operated effectively as a team during the exercise with introductions of who was delivering each role within the group, and it was obvious that the parties involved in the core group had been operating together regularly and there were good working relationships.

6.7.38 Introductions were delivered and information of the responsibilities of each attending organisation was included in the initial meeting invite. This can serve as a reminder and is particularly important for a sustained response where multiple resources will be delivering the roles in the EG.

Good practice 11: circulating information of the responsibilities of each attending organisation was positive and should be considered good practice for all EGs to consider.

6.7.39 EGLOs were stood up for the MRC and for the OCU and EG Advice notes were produced and circulated effectively. EGLOs provided sound feedback into the EG.

6.7.40 The chair recognised the requirement for clarity of role of the EG in potentially advising the onshore response, including monitoring, which was subsequently instigated.

6.7.41 Bringing the operator in to the second meeting was very positive. However, there seemed to be a gap in understanding from the operator about the role of the EG and what the statutory bodies involved could bring to the table: although not apparent during the EG meetings, the operator had set up a very comprehensive Environmental Unit and there was much potential for duplication regarding the initial sensitivity assessments. The Environmental unit had a number of tools, especially IT data management, visualisation etc., that could be beneficial to the response, particularly in the event of a longer-term incident with shoreline impacts.

Additional Technical Elements

6.7.42 Environmental sensitivities were identified and discussed during the EG meetings, however, the documentation was not witnessed by the evaluators nor written details of the prioritisation rationale agreed. This may have occurred outside of formal meetings which were unable to be witnessed as information was stored electronically within each respective organisation IT infrastructure.

6.7.43 During day two of the exercise, a press conference was held which provided a valuable opportunity for the EG chair to attend.

6.7.44 However, there was discussion on whether a press conference or media briefing could be attended by the role, due to the perception on delivering acting chair role on behalf of Marine Scotland who are not permitted to deliver media briefings.

6.7.45 The performance during the briefing should be commended and the individual encouraged to deliver the role for future responses. The messages were delivered with appropriate tone and empathy for an emotive subject.

6.7.46 The role of EG chair represents the multi-agency group and there is an expectation that they attend the media briefing with SOSREP to represent and provide environment group information to the media.

Lead evaluator comment: overall evaluation of the press conference, including relevant recommendations and observations, is included within section 6.12.

Observation 25: a reminder is required to all delivering the EG chair role that they do not represent their parent organisation when in this role but rather a multi-agency group independent of the employing organisation. Therefore, any organisation restrictions within their parent organisation should not be in scope when delivering the independent EG chair role. Failure to attend a panel

briefing alongside SOSREP would have the potential to have a negative impact on the delivery and influencing ability of the group.

Observation 26: consider the addition of media training as a required competency of the EG chair and vice-chair roles.

Recommendation 20: as part of the NCP review, the role of the EG should be reviewed and clearly defined to ensure it is effectively functioning and advising appropriate cells accordingly. STOp[7] notices may need to be updated as a result.

6.8 Marine Response Centre

6.8.1 The MRC evaluator, situated in person with the cell in Fareham, confirmed the MRC objectives had all been achieved and that the MRC worked well.

Establishment of the Response Cell

6.8.2 Given the limited time available for exercise play, and long mobilisation times of resources associated with a remote spill location, it would have been beneficial to stand up the MRC at the earliest opportunity. This would have allowed more time to 'close the loop' on pending actions and allowed more learning opportunities for members of the cell.

Lead evaluator comment: while this is accepted from an exercise point of view in reducing the available time for actions to be completed, the MRC was responding in a realistic timescale, as requested by the planning team.

6.8.3 There may have been an element of exercise artificiality in that the observation of pollution during aerial SAR operations would have likely confirmed the magnitude of pollution and prompted the earlier establishment of the MRC.

6.8.4 Although criteria and thresholds for activating the MRC are not made explicitly clear in the NCP, the composition of the cell was appropriate.

6.8.5 Administrative support was generally deemed satisfactory and the diligence of the cell's loggists was highlighted.

6.8.6 The use of SharePoint was hailed, during the hot washup, as an excellent way of sharing key information.

[7] Scientific, Technical and Operational advice notes

6.8.7 There were however some IT issues in providing access to SharePoint to new users - including the evaluator.

Lead evaluator comment: the SharePoint site was a trial of a new system following previous feedback, including a recommendation from Exercise Celtic Deep. Therefore, an additional section of this MRC evaluation has been included, starting at section 6.8.35, and contains additional feedback on this system.

6.8.8 A surface hub was used effectively for meetings requiring remote participation and on day 2, was used to display modelling data provided by OSRL. The room's larger monitor was non-functional throughout the exercise and was cited by some as an opportunity lost for displaying and disseminating key information.

6.8.9 The MRC was managed and chaired effectively, with ample opportunity given to members to ask questions and voice opinions/concerns.

Good practice 12: providing opportunity for members to ask questions and voice opinions or concerns contributed to the effective chairing of the MRC.

Response Cell Operations

6.8.10 A timeout agenda, as well as a description of roles and responsibilities were circulated at the beginning of day 1.

6.8.11 Action points and key decisions were recorded in the meetings, which were uploaded to the MRC's SharePoint site.

6.8.12 Meetings were held at suitable intervals throughout the day allowing a reasonable length of time to enable actions.

6.8.13 Discussions during these meetings demonstrated a good level of general understanding in the field of pollution response. Furthermore, there was good awareness of roles and responsibilities among members.

6.8.14 The focus of the timeout meetings was operational, which is considered appropriate given the MRC's remit outlined in the NCP; environmental issues were discussed primarily in the context of fate and trajectory modelling and its impact on response operations. All other environmental issues were discussed in breakout meetings and in liaison with the EG.

6.8.15 Throughout the two days, at-sea response plans were proposed, discussed and coordinated, primarily between OSRL, Ambipar and the MCA's Operations teams during breakout meetings.

6.8.16 There appeared to be forms and aide memories in use that not all CPSO's were familiar with e.g. CPS STIREP and Incident Details Form.

Recommendation 21: HM Coastguard should ensure all incident forms/templates/aide memories are located on the Coastguard Information Portal and all duty CPSO's aware of when they should be used.

6.8.17 Real-time common operating picture data relating to resource deployment was not displayed in the room.

Recommendation 22: within the MRC, the display of real-time common operating picture data relating to resource deployment would be beneficial for situational awareness

6.8.18 The notification of Bonn Agreement partners (most notably Norway under the Norbit Bilateral Agreement) was further evidence of good situational awareness among members of the cell. In addition, the appreciation of the operational and logistical advantages of the potential mobilisation of Norwegian assets, as well as local vessels of opportunity was also noteworthy.

Good practice 13: the members of the MRC showed excellent situational awareness throughout, which included knowledge and understanding of counter pollution activities, and familiarisation of national and international plans.

6.8.19 Communications towards the end of day one established that the cell's activities were to be effectively stood down overnight, meaning that comprehensive resilience planning was not undertaken (to the evaluator's knowledge), beyond the level of members being contactable by phone.

Communications

6.8.20 Email, phone calls and Teams calls/chats were utilised as the primary means of external communication throughout the exercise. Although the frequency and nature of these communications was difficult to evaluate (as these are limited to the devices of individual users), it is understood that external communications, primarily through the use of liaison officers, were in accordance with established response procedures.

6.8.21 As a general observation, hybrid meetings proved to be a great success, allowing seamless access to meetings in and out of the cell. The issue of siloed groups/actions (a common feature in command-and-control response) was therefore significantly less evident during this exercise.

Good practice 14: the efficient use of hybrid meetings, within and out with the cell, avoided groups and actions being operated in silo.

6.8.22 One potential drawback of remote participation was demonstrated by the absence of formal tasking of aerial assets by the MRC to RVL (who participated remotely) for test spraying activities. This was fed back to the MRC on day one and tasked retrospectively.

6.8.23 The DCPSO and head of MRC reacted in a calm, professional manner. It was noted by the DCPSO that the volume of calls received prior to the establishment of the MRC was considerable. Although there are some advantages to channelling queries solely to the DCPSO, it may be worth exploring opportunities for a more incremental approach to resourcing prior to establishing the MRC.

Observation 27: a more incremental approach to resourcing prior to establishing the MRC may remove some of the burden on the DCPSO.

Teamwork

6.8.24 The most cited feedback during the cell's hot wash-up was the advantage of having face-to-face interaction versus conducting meetings entirely virtually. This was reflected by the enthusiasm and collaborative spirit shown by members throughout the exercise.

6.8.25 Although it was clear that roles and responsibilities were well-understood, questions were often posed to more experienced members of the team on the broader context or reasoning behind certain structures and procedures. Those receiving such questions were clearly happy to share their knowledge and experience.

Good practice 15: regardless of knowledge and understanding of roles and responsibilities, utilising the expertise of more experienced cell members was beneficial.

6.8.26 Based on progress reports made during timeout meetings, it was clear that tasks among the various functions were understood and delegated appropriately, as were their review/feedback.

6.8.27 The head of the MRC liaised effectively with stakeholders in the meetings, including the heads of cells meeting which was held at the end of day two.

6.8.28 Decisions impacting the strategic, tactical and operational effectiveness of the response were communicated effectively within the cell and in liaison with other cells.

Additional technical elements

6.8.29 The evaluator was able to observe good general awareness of environmental sensitivities and response priorities. However, it was felt that had the exercise been slightly longer, allowing the simulated pollution to reach more sensitive coastal resources, these aspects would have been tested more fully.

6.8.30 To the evaluator's knowledge an MRC SITREP was not distributed. Liaison with the Office of the Chairman and Chief Executive (OCCE) to prepare and submit ministerial briefings was not observed.

Lead evaluator comment: it is not clear within the NCP or via other procedure, what SITREPs are required and if one type of SITREP supersedes another. There could be several cells distributing SITREPs such as the CPSO, MRC, SOSREP, HM Coastguard, etc.

Recommendation 23: as part of the NCP review, clearer guidance on SITREP formats and distribution should be clearly outlined. This should include whether the activation of some cells and SITREPs e.g. OCU, would negate the need for other cell SITREPs, or if they are all valid in their own right.

6.8.31 Detailed explanations of source-control actions were offered by the operator inside and outside of formal meetings. This helped other members of the cell to gauge the on-going risks and the potential impacts on their respective areas of work.

6.8.32 In respect of resources within the MCA stockpile, the prudent approach of putting assets on standby, rather than triggering full deployment, was employed. This was considered appropriate given the lack of clarity over the magnitude of the spill in the initial stages.

6.8.33 Outside of initial asset mobilisation, aerial surveillance and test spraying operations, there was limited scope to test this aspect of the cell's activity.

6.8.34 While the focus of the cell was operational, the impact of the media was clearly a consideration and was managed well.

Observation 28: many aspects of the MRCs response would have benefited from additional time at the end of the exercise. This may have been achieved with an earlier mobilisation, or considerations in future could allow for time jumps during the scenario, if exercise objectives allow.

MRC SharePoint site

6.8.35 As commented above, following on from previous learning, the MCA prepared a new resource on SharePoint to support the management, information sharing and actions of the MRC.

6.8.36 This was the first occasion the site had been used and therefore the exercise provided an excellent opportunity to test this with multiple external organisations.

6.8.37 The use of the SharePoint site was commonly cited as a very effective tool both via evaluator feedback and an online feedback form completed by MRC participants.

6.8.38 However, there were technical challenges experienced in getting external participants access to the site, including the MRC evaluator and the governance surrounding providing external access is unclear.

Recommendation 24: the MCA should review the governance around the sharing of access for external organisations to the MRC SharePoint site during incident working.

6.8.39 It was noted that some forms and templates were not included within the SharePoint folder and as such required time-consuming searches through personal drives.

6.8.40 It was very beneficial to upload reports and documents, reducing administrative burden on MCA personnel and risk of vital data being lost within emails.

6.8.41 This information being readily available and simple to access was lauded and the incident details document was easy to edit.

6.8.42 The sign in/out process was clunky using the system and therefore it was suggested that a manual process was utilised, unless a more efficient process could be developed with simple click.

6.8.43 Using the system lost some of the visuals available in the room and therefore timelines and/or summary information would be beneficial on a board and/or on the homepage of the site.

6.8.44 In summary, the system worked very well and in future, it was noted that initial incident information could be added to the system so by the time a MRC is formed, background content is already populated.

6.8.45 Having ICT support available to assist with any technical challenges would provide additional resilience.

Observation 29: the MRC SharePoint site worked admirably and therefore it will be beneficial for the MCA to consider all feedback received and make alterations as required to further improve the functionality.

6.9 Operations Control Unit

6.9.1 The OCU evaluator, situated in person in Aberdeen, confirmed the OCU objective had been achieved.

Establishment of the Response Cell

6.9.2 As the circumstances of the incident became clearer, the operator mobilised its IMT and OPRED mobilised their inspector to the IMT.

6.9.3 The SOSREP was notified by the OPRED duty inspector in accordance with the SOSREP notification and mobilisation policy.

6.9.4 Throughout these stages, communication was maintained between the relevant parties, primarily the operator, OPRED, MCA and the SOSREP.

6.9.5 When it became evident that the incident was significant and had the potential to escalate and result in significant pollution, the decision was taken by the SOSREP to mobilise to the operator's premises and enable closer communication and enhance incident understanding.

Observation 30: it should be noted that when the SOSREP makes the decision to mobilise to the premises of an operator, it is not inevitable that an OCU will also be established. This should not affect the liaison with the SOSREP which should be conducted correspondingly throughout any incident.

6.9.6 The SOSREP had 2-3 hours travel time and temporarily handed over responsibilities during that period to the deputy to the SOSREP. This was managed and communicated as per established protocols and appropriate communications were maintained throughout.

6.9.7 Upon arrival at the operator's office, the SOSREP took back control from the deputy and was given a full and detailed briefing by the OPRED inspector

present in the IMT. The SOSREP was then introduced to the relevant members of the operator's IMT, technical and management teams. The SOSREP had also mobilised independent technical expertise to provide support throughout the incident.

6.9.8 It was determined that an OCU meeting would not be established that day but it was requested that a meeting with the operator's representative and emergency operations manager be arranged. This meeting was also attended by the OPRED inspector, the CPSO and the SOSREP's independent technical advisor. It was considered likely that further such meetings would be required during the day.

6.9.9 This approach adopted by the SOSREP initially caused some confusion with the operator as they were unclear whether this was an 'OCU meeting'.

6.9.10 However, the style and approach of the SOSREP during these initial meetings fostered an immediate constructive, collaborative and effective relationship with the operator. Once fully understood, this approach was welcomed by the operator.

6.9.11 The SOSREP has been adopting this approach in several recent exercises and incidents, however, awareness does not seem to have reached industry and all stakeholders. The SOSREP should consider a mechanism to clearly communicate to industry and all relevant organisations what their approach will be during such incidents.

Lead evaluator comment: it was recognised that industry may not be familiar with this style, however, industry is also used to exercising in a very specific manner which may not lend itself to adapting to a fluid response. In addition, this approach was discussed throughout the planning of the exercise and was mentioned by the deputy to the SOSREP during a Harbour Energy briefing session held prior to the exercise. Furthermore, the NCP currently does not state that an OCU must be formed.

Observation 31: the SOSREP team may consider further engagement with industry regarding how they may approach the response to an incident, particularly in relation to OCUs.

6.9.12 The NCP states that where no OCU has been established, BEIS decides whether there is a need for additional formal inter-government liaison. When an OCU may not be established though the SOSREP is mobilised and attending the operator's premises, it must be ensured there is no decision-making conflict

or contradiction with regard to inter-governmental liaison. Protocols must be clearly captured within the NCP.

Recommendation 25: as part of the NCP review, the various ways in which the SOSREP may engage with parties should be captured to ensure continued delivery of organisational priorities and objectives and cross departmental communications. This should also be captured within the OPRED IRM.

Response Cell Operations

6.9.13 Throughout all discussions and meetings with the operator, the SOSREP displayed high levels of professionalism and presented a calm, supportive and collaborative manner. Meetings were constructive and relationships were positive. This approach facilitated the flow of information from the operator to the SOSREP and facilitated effective and constructive dialogue.

6.9.14 Whilst an OCU may still be established, it should not be the only mechanism by which the SOSREP communicates with the operator.

6.9.15 On day one of the exercise, the SOSREP hosted two meetings attended by the operator's representative, emergency operations manager, the operator's technical representative and the SOSREP's independent technical advisor. The MCA CPSO and OPRED inspector were also in attendance though due to a miscommunication, the OPRED inspector was not represented at the second meeting.

6.9.16 Further discussions were undertaken with the SOSREP's technical advisor and the operator technical teams working to resolve the issue.

6.9.17 Where no OCU is formed and/or outside of such meetings, the SOSREP may choose to meet with whomever they deem appropriate, to assess and understand the evolving situation. Therefore, stakeholders must ensure they have in place suitable alternative mechanisms outside an OCU to gather and disseminate the information pertinent to them.

6.9.18 In an OCU environment there are established processes whereby actions, decisions and commitments are recorded and disseminated and captured within a full meeting minute. No such record is made during these additional meetings and there is greater onus on the representatives of each separate stakeholder to feedback to their own organisation. The implications of that needs to be understood and considered by all relevant stakeholders.

Lead evaluator comment: it is acceptable to suggest that any implications should be considered, particularly unintended ones, however, discussions prior to, or between meetings are not logged and therefore it is always incumbent on the individual involved to ensure suitable notes and actions are recorded. This is not a new scenario but one which is important to be clear of.

6.9.19 It was noted that the role of the OPRED inspector is currently stated in the NCP as 'assistant to the SOSREP'. Their primary objective is that of gathering and disseminating information to OPRED and BEIS to allow delivery of their incident management priorities.

Lead evaluator comment: it should be emphasised that the function of the OCU meetings has not changed, and supplementary discussions are a way of enhancing the benefit of early engagement. Internal policies, such as the SOSREP notification and mobilisation policy, have been updated to reflect this change, and the NCP review will also consider this.

Observation 32: implications of the change in OPRED's role in the OCU needs to be understood by SOSREP and OPRED and future protocols documented.

Recommendation 26: OPRED should review and amend internal protocols regarding the interface between the OPRED inspector and SOSREP.

6.9.20 During the OCU meeting on day two of the exercise, all established protocols were adopted and implemented.

6.9.21 Recent changes to OCU admin functions worked well although it was clear some OPRED staff were not aware of these.

6.9.22 Throughout the OCU meeting the SOSREP maintained order and chaired the meeting effectively and professionally.

6.9.23 All participants representing the various response cells provided succinct and effective briefings to the SOSREP. This provided a clear understanding to all present as to the status of each cell and their key priorities and allowed for the essential response elements (source control, environmental aspects, SAR, etc.) to be considered, discussed and progressed.

6.9.24 The operator also provided a very detailed status update and informative description of their response options and associated timelines.

6.9.25 Minutes, actions and commitments were recorded throughout the meeting by the SOSREP support officer.

6.9.26 During all meetings there was extensive dialogue with, and queries from the SOSREP's independent technical advisor. It was evident the advisor was very experienced, knowledgeable and very able to provide essential support to the SOSREP.

6.9.27 However, it should be clear when the technical advisor, speaking on behalf of the SOSREP, is asking for a specific deliverable or whether it is general discussion and exchange of ideas, to ensure that the operator's technical resource can focus on resolving key issues and not unnecessarily diverted to look at options with a low likelihood of success.

Observation 33: the SOSREP's technical advisor should be aware of expectations regarding the importance of distinguishing between general queries or discussion and specific instructions. Embedding them within the Operators technical team from an early stage would be beneficial.

6.9.28 Given the nature of the scenario with both a sunken vessel and damaged oil and gas infrastructure, there was a potential need for both the SOSREP and their deputy to be involved. Whilst this would be treated as one incident, one individual would liaise with the shipping company, the other with the operator, coming together during an OCU to ensure openness and clear understanding on proposed plans.

Lead evaluator comment: during the planning and command of the exercise, this was discussed and it could be considered that the names of the cells were somewhat distracting in that the organisations represented, subjects discussed and actions assigned were more applicable regardless of what the cell was called.

Communications

6.9.29 Communication methods were selected based on what was best for any requirement and always utilised professionally and effectively.

6.9.30 SOSREP managed incoming communications well and was never overwhelmed despite multiple communications channels being used. SOSREP focused on the use of telephone conversation to receive and issue information and was not distracted by other communications platforms. This was important as it is easy to get drawn into multiple conversations on multiple channels.

6.9.31 There was never any indication that the SOSREP was becoming overwhelmed and always displayed a very calm, controlled and professional manner.

Teamwork

6.9.32 The various response teams worked effectively together, and information flowed easily between stakeholders.

6.9.33 Relationships and communications were positive, courteous and effective.

Additional Technical Elements

6.9.34 A Temporary Exclusion Zone (TEZ) was issued in good time and its details effectively communicated by the SOSREP to the operator. The size of the TEZ was smaller than initially requested but the reasons for that were clearly explained by the SOSREP.

6.9.35 SOSREP ensured there was close liaison between various media cells to ensure accuracy and consistency of message. Media briefings and press conferences were attended (remotely) by SOSREP and well executed.

6.9.36 A SOSREP SITREP was issued at an appropriate time (end of day one), contained sufficient detail regarding the current status of the incident and was circulated to all required recipients. Contents were clear and suitable for non-technical recipients

6.9.37 The NCP states that it is a BEIS function to brief Ministers until the SOSREP assumes responsibility and an OCU is established. In practice, whether an OCU is established or not, ERCO would continue to brief Ministers via their internal SITREP while the SOSREP will also issue their own SITREP.

Recommendation 27: clarity to be sought regarding the coordination of ministerial briefings so as to minimise the risk of providing contradictory information when the SOSREP is actively involved and/or an OCU is established. This needs to be agreed and detailed within the NCP.

6.10 Head of Cells meeting

6.10.1 The Head of Cells meeting with representation from all NCP cells and chaired by the SOSREP was undertaken in the latter stages of day two, after the OCU meeting had concluded.

6.10.2 Communications were effective and the meeting was well structured and facilitated. Succinct but sufficiently detailed briefings were provided by all participants.

6.10.3 The timing of this meeting was appropriate, but the limited amount of remaining exercise play negated the possibility of progressing relevant outputs.

6.11 Harbour Energy

6.11.1 The evaluation of the Harbour Energy response to the exercise was facilitated by Petrofac Training, with several evaluators monitoring in various locations in the Harbour Energy offices in Aberdeen.

6.11.2 The nominated representative from Petrofac provided a high-level summary of feedback for this report.

6.11.3 The collective evaluation summary of the Petrofac team concluded that all Harbour Energy objectives had been successfully achieved.

Initial actions and mobilisation

6.11.4 The initial mobilisation was activated and initiated as per procedure with appropriate support teams, including Technical Authorities, HR support group, Relatives and Media Response Teams and Environmental Unit identified and mobilised effectively.

6.11.5 Role checklists were followed and completed accurately in CIM[8] and all tasks were assigned, confirmed, and tracked effectively. There were no indications that actions were left outstanding.

6.11.6 OPEP checklists were activated at an appropriate time and used effectively to prepare for regulatory engagement.

6.11.7 IMT and Environmental Units were sufficiently staffed, and all responders demonstrated throughout an understanding of role expectations.

Ongoing operations

6.11.8 The team briefings were comprehensive, appropriate to the circumstances and delivered at the required frequency.

6.11.9 Briefings detailed the items that needed attention and ensured clear understanding of the situation update and the actions arising. Briefings were

[8] Crisis and Incident Management software – full suite available to multiple Harbour Energy teams for the purposes of efficient incident response and sharing of information

held at sensible intervals and great flexibility was shown when dealing with no notice requests/actions from the SOSREP and government players.

6.11.10 Updates, tasks and questions were exchanged between IMT, Crisis Management Team (CMT), Technical Support and Environmental Unit, once each team was active, all using each team's CIM workspaces

6.11.11 The Harbour Energy 'Heads of Cells'[9] briefing process was particularly effective throughout the response and allowed key information to be shared at a high level to ensure a common understanding.

6.11.12 The exercise allowed the opportunity to make a range of minor modifications to refine Harbour Energy's use of the CIM logging system, in particular adjusting how tasks were displayed/sorted to suit a variety of user purposes.

6.11.13 CIM was utilised correctly throughout and an examination of CIM shows an accurate and detailed picture was maintained throughout.

6.11.14 Appropriate welfare checks for responders were observed and colleagues were reminding each other to take breaks etc.

6.11.15 Oncoming replacement responders were appropriately briefed, response handover was successful, with no apparent gaps in understanding observed.

Communications

6.11.16 Overall, the communication process proved to be successful. All communication channels were used successfully and appropriately (email, mobile phone, conference call, Teams). IT remained robust throughout the response

6.11.17 Internal Communications were identified and actioned promptly. The ethos of 'get big quick'[10] was used to escalate functions' additional support resources.

6.11.18 External notifications were identified and delegated as per IMT plan with logs reflecting the notification calls, and the Contacts Status Board was updated with details of contacts made.

[9] Included the incident commander, environment unit leader, crisis management team liaison and OCU interface team, when mobilized.
[10] Overestimating the perceived impact and for each function to consider additional resource requirements and to mobilise these resources, with a view to standing them down if they are not required

6.11.19 The collation and dissemination of internal and external communications were briefed throughout, and summarised or highlighted at team briefings as needed for wider situational awareness/common operating picture.

6.11.20 Responders were asked at team briefings if they had any information to expand on the briefing, and to ask any questions to ensure understanding.

6.11.21 The incident commanders were both highly experienced and clearly demonstrated a good appreciation of their role in the response and the developing situation. Both had a calming demeanour and were able to understand the situation and how the response should be coordinated with internal and external contacts.

6.11.22 An appropriate number of NCP cell liaison reps were identified and mobilised. Initial contact with the NCP cells could have been better due to Harbour Energy being unaware of some cells being mobilised. Engagement improved on Day 2 once communication lines were established.

Teamwork

6.11.23 The responding teams demonstrated a high level of competence in their roles and their interfacing with external support and contacts.

6.11.24 Team members understood their roles and followed their checklists. There were several instances of good team collaboration, without the need to pass every detail through the Incident Commander, which aided team effectiveness.

6.11.25 Team responders were always asked for their input at team briefings and given time and attention to deliver their update or ask questions.

6.11.26 Key site tactical and strategic response options were discussed at head of cells meetings prior to IMT team briefings. Key decisions were distributed in a timely fashion and actions tracked via CIM in every team briefing and meeting.

Additional technical elements

6.11.27 The media response was a key focus for the CMT and from the very first meeting was a priority agenda item.

6.11.28 The initial Holding Statement created in the IMT was sourced and support given in the creation of the first Media Statement.

6.11.29 Thereafter, all media issues were efficiently handled, and the preparation of the company spokespeople was good.

6.11.30 Stakeholder analysis was carried out by the CMT communications role and the role players fed back that the interaction with the various senior stakeholders was sound.

6.11.31 There was some uncertainty over where statements are stored on CIM but this was captured.

6.11.32 The overall strategic approach and feedback was not as visible as it could have been. Harbour Energy were asking about the extent of media interest, but there was very little interest received during day one of the exercise.

Lead evaluator comment: the above evaluation comments pertinent to the Harbour Energy response are noted, however, further media evaluation is covered in section 6.12, which includes relevant observations.

6.11.33 Overall, the Harbour Energy response was good across all levels of the organisation.

Good practice 16: Lead evaluator comment: particular recognition is noted for the preparation and execution of the Harbour Energy involvement in the exercise, particularly given they only moved into their new Emergency Response suite shortly prior to the start of the exercise.

6.12 Media Response

6.12.1 The media evaluator, who was collocated with the command team in Aberdeen, considered all exercise objectives for media response to have been successfully achieved.

6.12.2 Due to the ongoing difficulties of providing sufficient personnel resources, it was accepted during the exercise's planning phase that the MCA Press Office would participate only until 1700 on the first day. This greatly diminished the efficacy and authenticity of the responses that would be expected in a real-world scenario.

6.12.3 To provide media injects from external sources, members of teaching staff and students from Aberdeen's Robert Gordon University (RGU) journalism course were engaged as "pseudo media" but again this was only for the first day. Three members of staff and two senior students took part and provided an excellent professional input to proceedings.

Good practice 17: involving senior media students in the exercise brought benefits to both sides

6.12.4 During the second day, the media evaluator took on the dual task of evaluating and providing media injects to provide realistic pressure on responders. Unfortunately, by then the MCA Press Office was no longer involved, as previously agreed during the planning stages.

6.12.5 The MCA Press Office trialled a common information-gathering and display system, called Trello, as a means of managing inputs to the exercise and also publishing statements and comments from it. It was asked that the RGU media players also use this system to log their queries and to view responses.

Good practice 18: ensuring there was a clearly accessible and visible online information-sharing system available to MCA Press office staff, some of whom might be working remotely

6.12.6 Despite the laudable aims of providing improved information management, the evaluator did not consider this to have been a success. It was unrealistic to expect media to confine themselves to a single point of contact and even more unrealistic to expect them to wait some considerable time for any update from it.

6.12.7 Trello is considered to have a useful role to play within the MCA Press Office for displaying and sharing information internally, but it is ineffective as a management tool for interactive use with external agencies.

Recommendation 28: the information-sharing system, Trello, should be used for internal purposes only and not as a tool for external interactions.

Establishment of the Media Response

6.12.8 Despite the Harbour Energy incident management team mobilising early in the exercise and a first external call being made to the MCA press office around an hour into the exercise, it was apparent that they were not receiving timely and effective information from HM Coastguard to allow them to respond to the growing number of media enquiries. This partially reflected the understandably high workload being experienced at that time by MRCC Shetland.

Good practice 19: ensuring internal staff were properly briefed and communication with other operational staff at an early stage to ensure the accuracy of any information issued

6.12.9 Unfortunately, there was an unacceptable delay in clearing this statement. Indeed, by the time it was issued, it had been superseded by events in the fast-moving incident.

6.12.10 Harbour Energy issued its first holding statement within two hours, however, the initial MCA press office statement was four hours after the start of the incident which was considered not acceptable.

6.12.11 The Press Office did, however, issue a short briefing note on media aspects of the incident to internal sources. This was circulated to the executive team and to ministers by the OCCE.

Good practice 20: ensuring senior staff and others are timeously and accurately briefed on the media aspects of a developing incident

6.12.12 Due to the evaluator working remotely from the MCA Press Office, they were unable to determine if MCA responders were made aware of their roles and responsibilities, and at times it was difficult to ascertain who was leading the incident response from within the Press Office.

6.12.13 It was also impossible to ascertain accurately if appropriate administrative and communications support was available in the Press Office, although the general view was that it was in short supply.

Media Response Operations

6.12.14 As the day progressed, the RGU media players were finding it extremely difficult to obtain information about the incident from MCA sources, expressing their frustration to the evaluator in the process.

6.12.15 Part of this problem was created through RGU media players having to use the Trello system, as previously agreed, rather than having wider free access, which would have been the case in a real-world scenario. Repeated requests for information through Trello, including specific requests for spokespersons or for additional details of the incident, went unanswered. In a real incident, this would have been unsustainable and unacceptable.

6.12.16 A first Communications Cell meeting was held at midday, including the MCA Press Office, Harbour Energy and Shetland Islands Council.

Good practice 21: establishment of a Communications Cell by MCA Press office with relevant external agencies involved

6.12.17 The evaluator did not consider this meeting to have been a success, due to poor management of the meeting, the failure to adhere tightly to the prepared agenda and the lack of agreed objectives.

6.12.18 There was some confusion thereafter over whether a press conference should be held later in the day. This is considered to be a reflection of the inadequate resources within the MCA Press Office to service the exercise, rather than an area of poor media practice.

6.12.19 It was agreed, however, that a further Communications Cell meeting would be held at in the afternoon and this one was more successful, sharing useful information and agreeing future tactics, including the provision of a press conference.

6.12.20 The press conference was held online through Teams with those taking part including representatives from HM Coastguard, SOSREP and Harbour Energy. The RGU media team provided the questions.

6.12.21 This press conference is considered to have been a success, although there were some concerns as to how much briefing from the MCA Press Office on likely media questions would have been possible in advance, given the tight timescales involved.

Good practice 22: a multi-agency press conference with appropriate senior personnel who could address media queries directly being held as soon as possible

6.12.22 Prior to the press conference beginning, the MCA Press office issued its second statement of the day. This statement was more forthcoming on detail but still did not address many of the outstanding questions being posed by journalists.

6.12.23 Following the conclusion of the press conference, the MCA Press Office and the RGU media team stood down and took no further part in the exercise, as was agreed during exercise planning.

6.12.24 During the day, it was observed that the MCA Press Office was not initially involved at meetings of senior staff at the silver and gold levels (tactical and strategic). This was in marked contrast to other players such as Harbour Energy who immediately activated their plan to have a media advisor in their Incident management team, reporting to the company's Crisis Management Team.

6.12.25 It seems that even by late morning, the tactical group did not consider this to be a high-profile media incident. The evaluator considers any failure to involve the

MCA Press Office at tactical and strategic levels from the outset is unacceptable oversight that would have potential consequences for public information and reputation management.

Recommendation 29: consideration should be given to establishing a Media Response Team within the MCA, utilising staff from out with the day-to-day press team. These people should train and exercise with permanent staff to assist the press team with information gathering and distribution, telephone and email responses and other administrative tasks during a major incident thereby freeing press officers to focus on their specialist tasks.

Recommendation 30: If no additional personnel are available within the MCA to assist its Press Office as outlined in Recommendation 29, consideration should be given to the retention of an independent media consultant on an "on call" basis who could be brought in to assist during a major incident to help ensure an efficient, effective and expeditious response from the MCA to a major incident.

Lead evaluator comment: as noted in 4.6, there were unexpected resource challenges in the lead up to the exercise. However, the above recommendations are still considered appropriate for additional support even with a full complement of press officers

Recommendation 31: Representatives of the MCA Press Office should be an integral part of all operational, tactical and strategic groups from the outset of any significant incident to avoid delays in public response and to provide accurate and professional assessments to senior officers of media requirements and likely levels of interest as an incident develops.

Lead evaluator comment: post exercise, the senior press officer held conversations with one of the HM Coastguard strategic commanders. It is noted that the learning from Exercise Phoenix has been very useful, and the above recommendation has been discussed already to ensure the MCA Press Office are included in relevant groups.

Furthermore, a live protracted incident occurring shortly after the exercise showed excellent engagement between HM Coastguard and the Press Office, partly supported by the learning from Exercise Phoenix.

6.12.26 As the MCA Press Office was unable to take part on the second day of the exercise, it was not possible to evaluate any aspects of its performance on that day. However, the remaining organisations continued to participate on the second day, resulting in considerable media activity.

6.12.27 As a general observation, it seemed that media participants had reflected on potential inadequacies of their response on day 1 and the inter-agency co-operation and information flows were much improved on day 2. There was increasing interaction between representatives of the MCA, BEIS, EG, Shetland Islands Council and Harbour Energy, which is to be welcomed.

Good practice 23: media interaction and information flowing between external agencies.

6.12.28 This has to be qualified, however, by a continued reluctance to answer specific questions which would have been essential in a real incident, with players instead relying on a cumbersome process of compiling, clearing and eventually issuing agreed statements. These were often out of date by the time they were received, were generally very "corporate" in nature and did not address many of the questions being asked.

6.12.29 It should be noted that queries to the Duty Press Officer for Marine Scotland did, in fact, generate detailed answers to each point raised and was to be commended. The same agency then provided a timely response to a follow-up query. This was almost the only time during the two days that detailed answers were provided to non-standard questions.

Observation 34: the ability to respond to detailed media enquiries, such as requests for access to premises for filming or identification of media spokespersons, in a timeous and accurate manner, is vitally important. Delays observed during the exercise would not have been sustainable in a real incident and reliance on official "procedural" statements would similarly have soon been overtaken by events.

Lead evaluator comment: it was seen during the exercise that in many cases responses to media questions was slow, however, it is recognised that some of this was caused by inadequate information flow to the press offices.

6.12.30 The need for a second press conference was debated at length on day two with some doubt as to who should facilitate such an event given the evolving nature of the incident.

6.12.31 The press conference was held at 1500 on day 2 and was attended not only by the SOSREP but also by senior representatives of the MCA, EG, Shetland Islands Council and Harbour Energy. OPRED declined to take part, citing a lack of media training in their team. All the questions were asked by the Media Evaluator. Those attending were appropriate to the situation and performed

well, answering all questions put to them. This was a useful and successful conclusion to the exercise in terms of media response.

6.12.32 There was a discussion on what the appropriate process would be regarding BEIS/OPRED representation at press conferences. However, it would be beneficial to clarify the expectation of who would facilitate a press conference.

Recommendation 32: MCA and BEIS to clarify who would take responsibility for facilitating press conferences. The result of which should be reflected in the NCP update.

Observation 35: the key role of the Environment Group in an incident of this nature should be recognised at an early stage with the group's input sought on all aspects of media response

Recommendation 33: as a lack of media training for senior OPRED officials was identified during the exercise, it would be beneficial for the agency to ensure this is available as a matter of course

Observation 36: all agencies should ensure that they have potential spokespersons in place for a major incident and that those individuals have received some media training

Technical Elements

6.12.33 The National Contingency Plan in operation at the time of Exercise Phoenix states at paragraph 22.1 that: "Good public communication is vital to the successful handling of any incident and should be incorporated in all contingency planning. When an incident occurs, the key communications objective is to deliver accurate, clear, timely and up-to-date information and advice to the public".

6.12.34 During Exercise Phoenix, information provided to the media was accurate and clear but was neither timely nor up-to-date, and little or no information of reassurance was provided to the public.

6.12.35 At paragraph 22.3, the National Contingency Plan notes that failure to provide an accurate, timely and consistent flow of information to the public: "...could have serious implications for the management of the whole incident and the public's trust in the Government's ability to resolve it"

6.12.36 Similarly, given the location of the incident in Exercise Phoenix, the Scottish Government's document "Preparing Scotland: resilience guidance" at Section 2,

part V (Duty to Communicate with the Public), sets out a mandatory requirement for Category 1 responders to: "Maintain arrangements to warn the public and to provide information and advice to the public if an emergency is likely to occur or has occurred". It also states that exercises must be carried out to ensure these arrangements are effective.

6.12.37 It is clear from both these documents that media response during a major incident is an essential element of the overall response to that incident and should be treated accordingly. The media evaluator believed there were instances during Exercise Phoenix when the media response was not given the priority indicated in the National Contingency Plan and in Preparing Scotland.

6.12.38 It was a good concept to involve senior students in the exercise playing the roles of external media. It was disappointing however that there was no direct supervision of them on the day from a member of the exercise command or planning team which could have identified appropriate pressure points and key issues as the exercise unfolded on which they could have focused their efforts.

6.12.39 It was frustrating that the reluctance of exercise players to interact with the media directly and to answer their questions, and the focus on the Trello system for logging requests and responses, blunted the efficacy of their input. That said, at the conclusion of the exercise, the teaching staff of the RGU media team made the following observation:

"From the student's point of view, this has been a terrific experience, they are getting so much out of it. Ironically, the lack of information coming forwards has forced them to think more carefully about what information we do have, what we do not have, what we still need to find out, how they can write up from sparse information etc. It is very hard to replicate these conditions in a lecture room. It is also great experience for them."

6.12.40 This is a positive aspect of good practice for Exercise Phoenix and is to be welcomed. The fact that it can be used not only as a training and learning experience internally, but also as a positive learning tool for those embarking on careers in the media, was an impact that brought additional benefits to both sides and an excellent use of available resources.

Good practice 24: including students as part of the exercise provided a useful training and learning experience for them, as well as positive input into the exercise.

6.12.41 One of the students who took part wrote-up the information she had gleaned during Day 1 in the style of a daily newspaper as it might have appeared on the morning of Day 2. This was an excellent learning opportunity and is included in Appendix G.

6.13 Resilience

6.13.1 It was noted within cells that the resilience of team members could have been challenged should the exercise have continued, representing a more protracted incident.

6.13.2 However, it is recognised that exercises bring some degree of artificiality and as has been seen in live incidents, responding organisations can often put in place special arrangements.

6.13.3 Nevertheless, it is considered essential that resilience is fully addressed, particularly in the case of some duty officers and/or chairs of cells.

Recommendation 34: careful consideration should be made by all organisations represented in NCP cells regarding their resourcing to ensure, where possible, there is resilience within relevant teams or that suitable sources of alternative support can be utilised.

6.14 Online Feedback

6.14.1 In total, 25 people completed the online feedback form, which was sent to all participants to gather additional information over and above that provided by the evaluation team. This is less than 17% of those who took part in the exercise but does provide a useful insight.

6.14.2 The feedback can also be compared against that from Exercise Celtic Deep and those in future years, to look for trends and cumulative results. A Power BI report has been created, displaying the results in visualisations, for easy interrogation.

6.14.3 The lead evaluator has analysed all comments received and while not all can be individually recorded in this report, key points are covered below and incorporated throughout the report.

6.14.4 There is a risk that many of these comments which cannot be included, and other useful points recorded through the formal feedback, perhaps of a more minor nature, could end up being lost.

Recommendation 35: the Power BI report including all online feedback is reviewed by the NCP strategic and tactical working groups, along with the formal report, to ensure all relevant comments can be captured. In addition, it may be worth future exercise reports including an appendix of pertinent minor points.

6.14.5 Based on the exercise objective, those who responded had a 94% agreement that the exercise was successful and 92% agreed that the exercise enabled them to effectively practice their response in the case of an actual oil and gas incident.

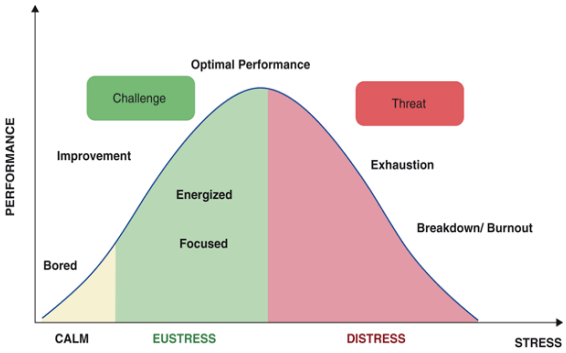
6.14.6 There was 98% agreement that respondents were treated with respect and dignity and 88% agreement in feeling adequately prepared to respond to related real-life scenarios, as a result of the exercise.

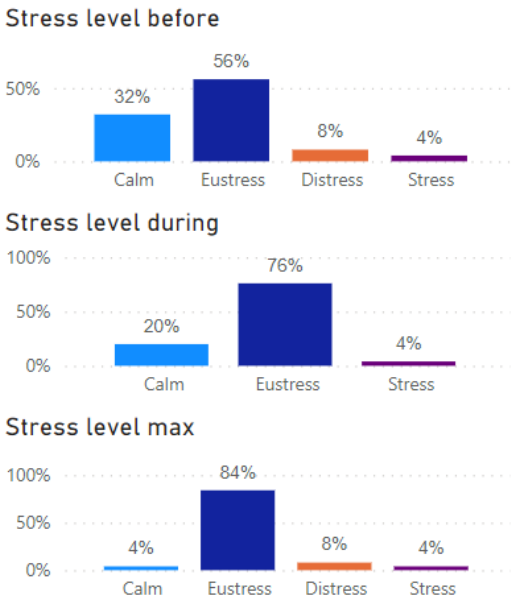
6.14.7 While more of Exercise Phoenix was carried out in a hybrid environment in comparison to Exercise Celtic Deep, 60% of respondents indicated they were working remotely, compared to 63% during Celtic Deep. This is likely influenced by the breakdown of those who provided the feedback.

6.14.8 93% agreed that they were able to respond effectively from a remote environment with 88% agreeing that they could respond as well remotely as they would have been able to in person.

6.14.9 Only 1 of the 25 responders suffered any ICT issues and this was an isolated issue not encountered previously. Remote operations are expanded upon below.

6.14.10 Once again, questions relating to human factors were included within the survey and as more exercises are conducted, MCA human factors experts will continue to analyse the feedback.





6.14.11 As can be seen in the graphs above, participants indicated that overall, they were calmer during the exercise than before it, with 96% being within the calm or eustress categories during the exercise compared with 88% before.

6.14.12 Individual responses mentioned an increase in stress levels when multiple calls were received at the same time, particularly in the initial stages of an incident. This is to be expected but should be monitored throughout by individuals and respective team leaders / chairs to ensure stress levels are not exceeded over a long period of time

6.14.13 There was 86% agreement that respondents felt rested before the exercise, with 60% feeling exhausted after the exercise.

Good practice 25: online feedback forms once again provided valuable additional information as part of the evaluation of the exercise. More replies would be beneficial and this should be encouraged in future exercises.

6.15 Remote Operations

6.15.1 This exercise was predominantly operated in a hybrid environment, with far more people participating in person than was seen during Celtic Deep.

6.15.2 It was generally felt across all areas that the availability and reliability of remote operations was far improved since Celtic Deep.

6.15.3 Microsoft Teams was by far the most used platform by all organisations with no reported issues with its use.

6.15.4 Other methods such as telephones and teleconferences were used and continue to be the preferred option for many purposes, as would be expected. However, the flexibility of Teams offered options for all cells, including the use of instant messaging.

6.15.5 Teleconferences were nominated by several groups as a contingency option.

6.15.6 There was no common operating system used across the whole exercise, but the introduction of the SharePoint site within the MRC was a notable improvement which may have a potential for expansion in future.

6.15.7 It was noticeable that there were no comments received during Phoenix regarding the management and control of meetings using Microsoft Teams, which is an improvement on those during Celtic Deep.

6.15.8 A recommendation from Celtic Deep noted that the NCP should include content regarding remote responses. This is once again supported within this report, however, it is understood that as the NCP is currently being updated, this will be included within the revision.

6.15.9 Comments noted that having use of an electronic whiteboard would be useful within the cell.

Lead evaluator comment: several applications are available for use including the likes of Jamboard, MIRO or Mural. Mural was used by the command team during the exercise and is covered in more detail below.

6.15.10 Small cameras within each cell meeting in person could provide awareness for evaluators to have an overview of actions being undertaken within the room.

6.16 Mural

6.16.1 To compliment the command log Mural was utilised to help capture the timeline of events, how participants and command staff were feeling, the pinch points and future opportunities.

6.16.2 This proved to be a great edition to the exercise command team and helped to capture the timeline of the exercise and associated observations

6.16.3 However, there was a fair bit of duplication from the command log and members of the command team were not often checking Mural during the exercise.

6.16.4 While some found the system useful, it was not used to its full potential and therefore consideration could be given to how it can be used in future exercises.

6.16.5 This was the first time the system was trialled in this way and there are certainly benefits from refining its use in future exercises, particularly with highlighting feelings, pinch points and incomplete actions.

6.17 Conclusion

6.17.1 Throughout Exercise Phoenix there was an excellent collaboration between participants, with those explaining technical processes doing so in a way that all individuals could understand.

6.17.2 The exercise showed that a hybrid response to an incident is highly achievable and effective and is likely to be the default position for incident response in future.

6.17.3 The exercise provided a safe learning environment for participants and this should be further encouraged, maximising opportunities for further development including training before and after NCP exercises.

6.17.4 The improvement in availability of technical solutions and the familiarity of participants to the use of online software was of particular note since Exercise Celtic Deep and is a testament to the time spent by organisations developing reliable systems but also to individuals for adapting to a changing normal.

6.17.5 Resourcing issues for responding organisations was challenging at times and created pressure points which could have contributed to heightened stress for responders or create confusion in regard to roles and responsibilities. This can be compounded by individuals carrying out dual roles, particularly in the case of being in the planning/command team and responding.

6.17.6 The use of administrative support in some teams was highly beneficial although limited in many cases. The benefits of efficient admin resource was evident with some responders stating that they would look to utilise this further in future. However, there was a common identification of a requirement for more cross organisation administration support during large scale incidents.

6.17.7 The exercise was filmed from two locations, Fareham and Aberdeen, capturing footage from the JRCC, MRC, exercise command team, OCU and Harbour Energy, and is available to view here. The exercise director would like to thank all involved in this for their participation.

6.17.8 Exercise Phoenix was successful in testing and evaluating the NCP in a safe environment, providing key learning to all organisations.

Appendix A – Exercise Team Members

Core Planning Team

Name	Role	Organisation
Lisa McAuliffe	Exercise Director	MCA
Pete Lowson	Lead Evaluator	MCA
Dominic Stevens	Exercise Secretariat	MCA
Heather Skull	Planning Team Member	MCA
David Graham	Planning Team Member	MCA
Michelle Hickson	Planning Team Member	OPRED
Francesca Barkess-Kerr	Planning Team Member	BEIS
Kelly Barnes	Planning Team Member	BEIS
Ingrid Gall	Planning Team Member	Shetland Islands Council
Marc Duncan	Planning Team Member	Harbour Energy
Andy Lang	Planning Team Member	Harbour Energy
Zoe Crutchfield	Planning Team Member	Marine Scotland
Sam Phillips	Planning Team Member	MCA
Andrew Kelly	Planning Team Member	DfT
Roy White	Planning Team Member	DfT

Exercise Command Team

Name	Location	Organisation
Lisa McAuliffe	Aberdeen	MCA
Pete Lowson	Aberdeen	MCA
Dominic Stevens	Aberdeen	MCA
David Graham	Aberdeen	MCA
Mike Lowson	Aberdeen	Lowson Media
Michelle Hickson	Aberdeen	OPRED

Francesca Barkess-Kerr	London	BEIS
Ingrid Gall	Shetland	Shetland Islands Council
Marc Duncan	Aberdeen	Harbour Energy
Andy Lang	Aberdeen	Harbour Energy
Amy Phillips	Aberdeen	MCA
Ken Church	Aberdeen	OSRL
Andy Cordon	East Midlands	RVL
Gary Ferguson	East Midlands	RVL
John Tulloch	Remote	Ambipar
Harry Jolly	Remote	Ambipar
Matt Totes	Doncaster	2Excel

Evaluation Team

Name	Location	Cell	Parent Organisation
Pete Lowson	Aberdeen	Lead Evaluator	MCA
Andrea Winterton	Aberdeen	EG Evaluator	National Resources Wales
Stuart Hankey	Aberdeen	EG Di-staff	Environment Agency
Miguel Patel	Fareham	MRC Evaluator	ITOPF
Steve Fraser	Aberdeen	OCU Evaluator	OPRED
Lee Duncan	Lerwick	MRCC Evaluator	MCA
Roly Mckie	Fareham	HMCG Evaluator	MCA
Mike Lowson	Aberdeen	Media Evaluator	Lowson Media
Andy Matthews	Aberdeen	Harbour Energy Evaluator	Petrofac
Les Donaldson	Shetland	Shetland Islands Council Evaluator	Orkney Islands Council
Jan Riise	Shetland	Shetland Islands Council Evaluator	Shetland Islands Council
Mike Lowson	Remote	Media	Lowson Media

Appendix B – Summary of Recommendations

Recommendation 1: the NCP strategic working group appears to be best placed to take accountability for the planning of each national exercise and should consider assuming this responsibility. This involves appointing a suitable exercise director, who would be accountable to this group for a timely delivery of the exercise.

Recommendation 2: adequate provision of resources should be made to ensure the MCA Press Office can play a full role in future major emergency exercises to ensure that no learning opportunities or areas for improvement are neglected. This should consider the wider impacts of the exercise and participating organisations reliance on MCA participation.

Recommendation 3: The high level of likely media interest in a major incident, including that of social media, should be more adequately represented in a future national emergency exercise of this nature. In addition, a senior representative of the MCA Press Office should participate either in the planning/command team for that exercise, or play their day-to-day role in that exercise, but not both.

Recommendation 4: the NCP strategic and tactical working groups must work expediently with the MCA and OPRED to ensure recommendations and observations are fully addressed within an agreed timeframe of the exercise being delivered. Its recommended six months would be a suitable and acceptable period to deliver this.

Recommendation 5: the MCA provide suitable training and refresher opportunities for all expected MCA participants of national exercises, to maximise the learning opportunity and where possible, extend the training to other officers.

Recommendation 6: the MCA should make it clear within command and control plans, what the reporting expectations are for commanders and duty officers.

Recommendation 7: HM Coastguard to train and exercise regularly using JESIP or other agendas and include the joint decision model (JDM) in operational response.

Recommendation 8: HM Coastguard and SOSREP should refine their requirements for CGLO's within relevant response teams to ensure procedures for them attending meetings, both virtually and in person, are established.

Recommendation 9: HMCG to consider how operational support are tasked in the event of a major incident.

Recommendation 10: OPRED and ERCO should review their response documents and refine the process for when ERCO should become involved during an incident.

Recommendation 11: a review of the response document for the IBR would be beneficial and should include guidance on mechanisms for ERCO and OPRED to interface effectively.

Recommendation 12: OPRED should consider the best way to communicate information in a timely manner, be it through contemporaneous updating of logs, telephone calls, MS Teams chats or a combination of these. This may be best achieved by setting up a working group of those involved in the exercise to allow them to share experiences on the challenges faced during the exercise

Recommendation 13: OPRED should consider the roles policy silver and policy bronze played in the exercise to ensure that tasks are distributed amongst other colleagues to ensure policy silver is not overloaded.

Recommendation 14: Colleagues throughout the response structure may benefit from a discussion so there is an understanding of why it is challenging to provide information from an IMT to an IBR, but for those involved in the IBR to explain why it is important to receive timely information to allow ERCO to deal with the pressure from SpAds and Ministers.

Recommendation 15: OPRED should consider how communications with the SOSREP are improved such that there is awareness of significant events involving the SOSREP, such as the press conference.

Recommendation 16: OPRED should discuss with the SOSREP to understand why the Independent Specialist Technical Advisor (TA) was not sourced as per the method detailed in the IRM, and if this approach is to be adopted going forward any role OPRED will have in assessing the technical suitability of TAs appointed by the SOSREP.

Recommendation 17: OPRED should outline in the Incident Response Manual (IRM) the minimum resource requirements to manage large volumes of information during the initial hours of an incident. The IRM should outline what information should be prioritised to be triaged back to the IBR to maintain a consistent flow as well as outlining the rhythm for the mobilised inspectors to feed information back to the IBR. In addition, the IRM should outline the thresholds for allocating additional resource.

Recommendation 18: the logistics cell should maintain best practice for remote workers of sharing SharePoint folders and documents with those who are not based in the 1VS EOC, to improve the operationalisation of the response to aid communication of the products required, the deadlines and daily rhythm. This should be reflected in the Incident Response Manual.

Recommendation 19: OPRED to review how information is filtered to ERCO and how to submit incident notifications in a format which can be easily translated into the SITREP. In addition, consider renaming the incident notification so that the title is not conflated with the initial notification received at the outset of the response. ERCO should also ensure that commissions are clear and outline the information that Is required.

Recommendation 20: as part of the NCP review, the role of the EG should be reviewed and clearly defined to ensure it is effectively functioning and advising appropriate cells accordingly. STOp notices may need to be updated as a result.

Recommendation 21: HM Coastguard should ensure all incident forms/templates/aide memories are located on the Coastguard Information Portal and all duty CPSO's aware of when they should be used.

Recommendation 22: within the MRC, the display of real-time common operating picture data relating to resource deployment would be beneficial for situational awareness

Recommendation 23: as part of the NCP review, clearer guidance on SITREP formats and distribution should be clearly outlined. This should include whether the activation of some cells and SITREPs e.g. OCU, would negate the need for other cell SITREPs, or if they are all valid in their own right.

Recommendation 24: the MCA should review the governance around the sharing of access for external organisations to the MRC SharePoint site during incident working.

Recommendation 25: as part of the NCP review, the various ways in which the SOSREP may engage with parties should be captured to ensure continued delivery of organisational priorities and objectives and cross departmental communications. This should also be captured within the OPRED IRM.

Recommendation 26: OPRED should review and amend internal protocols regarding the interface between the OPRED inspector and SOSREP.

Recommendation 27: clarity to be sought regarding the coordination of ministerial briefings so as to minimise the risk of providing contradictory information when the SOSREP is actively involved and/or an OCU is established. This needs to be agreed and detailed within the NCP.

Recommendation 28: the information-sharing system, Trello, should be used for internal purposes only and not as a tool for external interactions.

Recommendation 29: consideration should be given to establishing a Media Response Team within the MCA, utilising staff from out with the day-to-day press team. These people should train and exercise with permanent staff to assist the press team with information gathering and distribution, telephone and email responses and other administrative tasks during a major incident thereby freeing press officers to focus on their specialist tasks.

Recommendation 30: If no additional personnel are available within the MCA to assist its Press Office as outlined in Recommendation 29, consideration should be given to the retention of an independent media consultant on an "on call" basis who could be brought in to assist during a major incident to help ensure an efficient, effective and expeditious response from the MCA to a major incident.

Recommendation 31: Representatives of the MCA Press Office should be an integral part of all operational, tactical and strategic groups from the outset of any significant incident to avoid delays in public response and to provide accurate and professional assessments to senior officers of media requirements and likely levels of interest as an incident develops.

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Recommendation 33: as a lack of media training for senior OPRED officials was identified during the exercise, it would be beneficial for the agency to ensure this is available as a matter of course

Recommendation 34: careful consideration should be made by all organisations represented in NCP cells regarding their resourcing to ensure, where possible, there is resilience within relevant teams or that suitable sources of alternative support can be utilised.

Recommendation 35: the Power BI report including all online feedback is reviewed by the NCP strategic and tactical working groups, along with the formal report, to ensure all relevant comments can be captured. In addition, it may be worth future exercise reports including an appendix of pertinent minor points.

Appendix C – Summary of Observations

Observation 1: sourcing an exercise director from the SOSREP team can limit the realism for the team responding to the scenario.

Observation 2: organising a virtual session for observers can provide a good overview of an exercise to a wide audience and should be considered for future exercises.

Observation 3: individuals participating during an exercise, who have been part of the planning or command team, or who are role-playing, can add confusion to the response and all endeavours should be made to keep these as separate roles.

Observation 4: recognising the importance of these national exercises, participating organisations should suitably prepare and resource for them.

Observation 5: it is important to have all planning team members fully engaged in the process early, including with full access to the SharePoint site.

Observation 6: the use of real weather during the exercise may have been a contributing factor to confusion regarding some of the fictitious reports such as those from the aircraft.

Observation 7: regular operational briefings are important to maintain a common recognised information picture. Strict discipline should be adopted throughout, to ensure full understanding of the situation and account of actions.

Observation 8: given the level of discussion relating to a major incident, additional awareness training may benefit the MCA decision makers in future multi-agency scenarios, specifically regarding a threshold for declaring a major incident, the requirements for downgrading a major incident and whether a strategic/gold group can stand down while a major incident is still declared.

Observation 9: it was observed during the exercise that several participating organisations were not familiar with the role of ERCO, which may have contributed to some of the points raised throughout this section.

Observation 10: the Shetland oil spill contingency plan is in draft and unclear on strategic priorities and agendas which should be considered in the final version.

Observation 11: Shetland Islands Council could consider an exercise to map logistics, economic and community resilience issues following this exercise

Observation 12: Shetland Islands Council consider the formal use of WhatsApp during an emergency.

Observation 13: Shetland Islands Council should consider the upgrade and location of equipment which would be used in response to an incident.

Observation 14: Shetland Islands Council to consider a secondment of an IT specialist to incident support.

Observation 15: Shetland Islands Council to consider the use of a dedicated action, policy and decision log in respective plans and response.

Observation 16: resilience at Shetland Islands Council was stretched, as became apparent when individuals not intending to respond to the exercise were required to do so. Appreciating the constraints on the size of the council, consideration could be given on how best to provide relief in some key areas.

Observation 17: Shetland Islands Council to consider the formation of a tactical cell during incident response and appropriate representation at Shetland Emergency Planning Forum meetings.

Observation 18: Shetland Islands Council should consider reviewing the administrative support to incident response within the review of relevant plans.

Observation 19: Shetland Islands Council to consider carrying out a training needs analysis for incident response in line with a review of relevant plans.

Observation 20: Shetland Islands Council should ensure a tier 2 response is in place.

Observation 21: the creation of a multi-agency Standing Environment Group plan/ guidance for all EG members may be beneficial over and above Marine Scotland guidance for their duty officers and EG chairs.

Observation 22: the use of a common shared system for all EG members to have access to the EG operational guidance response plans / templates ensures resilience in delivery of the function of the EG, whilst always enabling common access to all members

Observation 23: the EG consider the volume of actions being assigned to individuals and ensure a review is held on the capacity of delivery, or if support could be provided from across the wider group

Observation 24: the EG consider agreeing action deadlines when they are assigned, to ensure focused delivery and prioritisation on importance.

Observation 25: a reminder is required to all delivering the EG chair role that they do not represent their parent organisation when in this role but rather a multi-agency group independent of the employing organisation. Therefore, any organisation restrictions within their parent organisation should not be in scope when delivering the independent EG chair role. Failure to attend a panel briefing alongside SOSREP would have the potential to have a negative impact on the delivery and influencing ability of the group.

Observation 26: consider the addition of media training as a required competency of the EG chair and vice-chair roles.

Observation 27: a more incremental approach to resourcing prior to establishing the MRC may remove some of the burden on the DCPSO.

Observation 28: many aspects of the MRCs response would have benefited from additional time at the end of the exercise. This may have been achieved with an earlier mobilisation, or considerations in future could allow for time jumps during the scenario, if exercise objectives allow.

Observation 29: the MRC SharePoint site worked admirably and therefore it will be beneficial for the MCA to consider all feedback received and make alterations as required to further improve the functionality.

Observation 30: it should be noted that when the SOSREP makes the decision to mobilise to the premises of an operator, it is not inevitable that an OCU will also be established. This should not affect the liaison with the SOSREP which should be conducted correspondingly throughout any incident.

Observation 31: the SOSREP team may consider further engagement with industry regarding how they may approach the response to an incident, particularly in relation to OCUs.

Observation 32: implications of the change in OPRED's role in the OCU needs to be understood by SOSREP and OPRED and future protocols documented.

Observation 33: the SOSREP's technical advisor should be aware of expectations regarding the importance of distinguishing between general queries or discussion and specific instructions. Embedding them within the Operators technical team from an early stage would be beneficial.

Observation 34: the ability to respond to detailed media enquiries, such as requests for access to premises for filming or identification of media spokespersons, in a timeous and accurate manner, is vitally important. Delays observed during the exercise would not have been sustainable in a real incident and reliance on official "procedural" statements would similarly have soon been overtaken by events.

Observation 35: the key role of the Environment Group in an incident of this nature should be recognised at an early stage with the group's input sought on all aspects of media response

Observation 36: all agencies should ensure that they have potential spokespersons in place for a major incident and that those individuals have received some media training

Appendix D – Summary of Good Practice

Good practice 1: while not expected to be applicable in every scenario, including an element of SAR within the exercise provides a valuable realism and should be encouraged where applicable.

Good practice 2: having role-players co-located with the command team, with a sufficient number of individuals, greatly contributed to the successful delivery of the exercise.

Good practice 3: all individuals involved in a response should explain any and all technical processes and language so that all relevant players understand.

Good practice 4: circulation of actions and pertinent information following meetings was very useful to both parties and OPRED should also consider providing administrative resource to the IBR to support this function.

Good practice 5: utilising the experience of key staff is valuable and should be encouraged

Good practice 6: Shetland Islands Council exercise players across the agencies provided a good response to a credible exercise scenario which was acknowledged in the hot debrief.

Good practice 7: the EG evaluator noted that all EG members should be commended for the engagement and enthusiasm in delivering their roles during the EG operational response cell, which ultimately supported the successful operation of the cell.

Good practice 8: the EG having pre-set agendas, guidance and documentation, prepared and updated regularly, were provided in a timely manner assisting in the efficient operation of the group.

Good practice 9: the EG chairs were proactive in ensuring inclusion, with all members having an opportunity to contribute.

Good practice 10: the delivery of the EG liaison officer role is considered a model example of this role and should be commended.

Good practice 11: circulating information of the responsibilities of each attending organisation was positive and should be considered good practice for all EGs to consider.

Good practice 12: providing opportunity for members to ask questions and voice opinions or concerns contributed to the effective chairing of the MRC.

Good practice 13: the members of the MRC showed excellent situational awareness throughout, which included knowledge and understanding of counter pollution activities, and familiarisation of national and international plans.

Good practice 14: the efficient use of hybrid meetings, within and out with the cell, avoided groups and actions being operated in silo.

Good practice 15: regardless of knowledge and understanding of roles and responsibilities, utilising the expertise of more experienced cell members was beneficial.

Good practice 16: Lead evaluator comment: particular recognition is noted for the preparation and execution of the Harbour Energy involvement in the exercise, particularly given they only moved into their new Emergency Response suite shortly prior to the start of the exercise.

Good practice 17: involving senior media students in the exercise brought benefits to both sides

Good practice 18: ensuring there was a clearly accessible and visible online information-sharing system available to MCA Press office staff, some of whom might be working remotely

Good practice 19: ensuring internal staff were properly briefed and communication with other operational staff at an early stage to ensure the accuracy of any information issued

Good practice 20: ensuring senior staff and others are timeously and accurately briefed on the media aspects of a developing incident

Good practice 21: establishment of a Communications Cell by MCA Press office with relevant external agencies involved

Good practice 22: a multi-agency press conference with appropriate senior personnel who could address media queries directly being held as soon as possible

Good practice 23: media interaction and information flowing between external agencies.

Good practice 24: including students as part of the exercise provided a useful training and learning experience for them, as well as positive input into the exercise.

Good practice 25: online feedback forms once again provided valuable additional information as part of the evaluation of the exercise. More replies would be beneficial and this should be encouraged in future exercises.

Appendix E – Cell Objectives

Branch	Objective (s)
HM Coastguard	• Exercise command, control, and coordination of a complex incident involving all branches of HM Coastguard and external stakeholders • Demonstrate effective internal and external stakeholder engagement, command structure escalation, and partner agency notification and collaboration • Demonstrate HM Coastguards ability to ensure a significant marine pollution and salvage incident is brought to a safe and satisfactory conclusion
SOSREP	• To exercise the SOSREP function in relation to a major oil and gas incident, establishing a Operations Control Unit and testing communication protocols across Government and industry.
MRC	• To exercise the NCP's incident alerting and response activation procedures, culminating in a coherent and effective national commitment • To exercise the Marine Response Centre (MRC), assess the effectiveness of current internal procedures and to test the command and control and interfaces and interdependences across all response levels, looking particularly at interactions between the MRC and other maritime and participating land based response cells, functions, cross-government and inter-agency liaison, and the co-ordination of public communication arrangements. • To test the integration of at-sea surface response, vessel of opportunity configuration and aerial activities with industry.
EG	• Test and evaluate the process and procedures in place to set up and run an EG over several days including overnight input and NS acting as EG chair • Test links with other cells and evaluate the usefulness and quality of information provided by EG emergency response • Evaluate delivery of EG functions versus delivery of own organisation functions – can benefit of EG be increased?

OPRED / BEIS	• To assess and evaluate whether Harbour Offshore and Onshore OPEPs are effectively implemented in response to a major pollution incident • To evaluate the notification to OPRED, the SOSREP and the mobilisation and function of the OCU • To evaluate BEIS procedures in response to a major pollution incident • To evaluate information transfer and communication between BEIS (OPRED), Harbour, MRC, EG, local authorities and OCU.
DfT	• To exercise the Maritime Resilience Team in its response to a major maritime incident, particularly the role expected of it and the support it provides to the MCA and Ministers. • To ensure that the MCA and DfT press offices have an understanding of their respective roles during the incident. • To familiarise the Minister and his officials with the procedures and stakeholders during a major maritime incident.
Harbour Energy	• Test and practice Harbour Energy's emergency and oil spill response procedures, facilities and arrangements to a large scale pollution incident • Test and practice the interface processes between Harbour Energy and the various UK Government and NGO agencies who have a role within the National Contingency Plan • Practice Harbour Energy's oil spill interface and associated processes • Establish Harbour Energy's media processes as part of a National agency response • Provide the opportunity to improve current Harbour Energy procedures, processes and facilities.
Shetland Islands Council	• To test and validate the activation and the key response arrangements set out in the Shetland Marine Pollution Plan including Shoreline Pollution Response and the SIC Major Incident Plan (both currently under review) are established and achieved. • To test the interaction between the plans and the MCA's National Contingency Plan specifically testing the strategic decision-making process accounting for the political and socio-economic significance of Shetland and associated Critical National Infrastructures. • To test the communication and remote working arrangements between agencies and the command and control structure established for the At Sea, Port, CGOC, Contractors and shoreline responses. • Assess both internal and external communication pathways and information sharing.

	• To evaluate the response and management of a heavy crude release incident, and its implications, offshore and around the Shetland coast. • To exercise the multi-agency preparedness and response to an oil spill washing on the shoreline, including Special Area of Conservation and SSSIs. • To exercise officers in their role at Strategic, Tactical and Operational levels, responding to a marine pollution incident impacting on Shetland. • To identify and address lessons learned from the exercise to improve the response and coordination to a maritime pollution incident impacting on Shetland. • To test overnight resilience of the response. • Following COP26 in November 2021, consider arrangements in relation to protests following a major oil pollution incident.
Media	• How the press team looks to build relationships with other media officers locally and nationally in an incident • Exercise the current major incident plan to highlight any gaps in how it works and identify any lack in knowledge or training needs • To encourage MCA/HMCG operational colleagues to think strategic comms and support them in interview/press conference roles

Appendix F – Glossary of Terms

Title	Abbreviation	Description/Definition
1 Victoria Street, London	1VS	Where the ERCO emergency response team were based.
Allision		Defined as a violent contact between a vessel and a fixed structure.
Cell		As per the NCP, the term ‘cell’ in this report refers to any centre, cell, unit, group, team, or similar grouping term used within the response to the exercise.
Coastguard Information Portal	CIP	The authoritative source of reference and guidance for use by all operational HM Coastguard officers, including policy, operational procedures, operational detail, and references.
Coastguard Liaison Officer	CGLO	An operational coastguard officer acting as a liaison point between HM Coastguard and a relevant cell e.g. the MRC
Command log		A log utilised by the exercise command team to track injects and key exercise actions.
Command, Control and Coordination	3Cs	An internal MCA project considering the command, control and coordination elements of HM Coastguard during major and complex incidents

Coronavirus Pandemic	COVID-19	Coronavirus is an infectious disease caused by the SARS-CoV-2 virus.
Crisis and Incident Management software	CIM	Full suite available to multiple Harbour Energy teams for the purposes of efficient incident response and sharing of information
Crisis Management Team	CMT	A response team mobilised to account for strategic requirements of an organisation.
Department for Business, Energy and Industrial Strategy	BEIS	A UK Government Department for leading economy-wide transformation by backing enterprise and long-term growth, generating cheaper, cleaner, homegrown energy and unleashing the UK as a science superpower through innovation.
Department for Transport	DfT	A UK Government Department responsible for transport.
Directing Staff		Directing Staff (Exercise Directors) play a role in all types of exercises and report to the Exercise Controller. They have access to the whole exercise programme and ensure that it proceeds according to plan.
Distress		A situation wherein there is reasonable certainty that a vessel or other craft, including an aircraft or a person, is threatened by grave and imminent danger and requires immediate assistance
Duty Counter Pollution Salvage Officer	DCPSO	An MCA officer during a period of duty responsible for technical and operational response to pollution and / or salvage incidents.

Duty Operations Director	DOD	The DOD is responsible for keeping the Director of HM Coastguard and/or the MCA Chief Executive briefed on all major Maritime, Coastal and inland incidents relating to the six Coastguard functions.
Emergency Liaison Group		Resilient Partnership Emergency Liaison Groups (also known as Emergency Co-ordinating Groups (ECGs)) will usually be the initial multi-agency group to form in response to an UNUSUAL or MAJOR INCIDENT
Emergency Operations Centre	EOC	ERCO manages and maintains a fully functional Emergency Operations Centre (EOC) at 1 Victoria Street (London) with the capacity and capability to respond to two concurrent emergencies with secure communication lines and backup power
Emergency Response: Capabilities and Operations Team	ERCO	The role of ERCO is to gather information from OPRED and wider cross-Government sources and consider the potential impacts on the UK as a whole and provide briefings and SITREPS to ministers and Cabinet Office Briefing Room as required.
Emergency Response Team	ERT	In the event of an emergency, ERCO may establish an Emergency Response Team (ERT). The ERT is a multi-functional team made up of ERCO, Sector Teams, and Comms as appropriate, who can provide an effective BEIS response to an emergency.
Environment Group	EG	The Environment Group (EG) provides a single advisory line on public health and environmental issues at sea to all response cells
Environment Group Liaison Officer	EGLO	A person representing the EG in another NCP cell e.g. OCU
Exclusive Economic Zone	EEZ	An exclusive economic zone (EEZ), as prescribed by the 1982 United Nations Convention on the Law of the Sea, is an area of the sea in which a sovereign state has special rights regarding the exploration and use of marine resources, including energy production from water and wind.

Harbour Energy		The largest UK listed independent oil and gas company which includes operation of the Solan installation.
His Majesty's Coastguard	HM Coastguard	The search and rescue division of the MCA.
Holding Statement		An initial, pre-approved media statement, providing basic confirmation of an ongoing incident.
Incident Briefing Room	IBR	In the event of a significant pollution incident, OPRED may set up an Incident Briefing Room (IBR). The purpose of the IBR is to facilitate the flow of information relevant to the incident, from a BEIS perspective between the Responsible Person or the OCU and Emergency Response: Capabilities and Operations Team (ERCO).
Incident Management Team	IMT	The response team mobilised by Harbour Energy in to support operations during the response to an offshore emergency.
Incident Response Manual	IRM	OPRED's response framework for personnel following notification of a pollution or potential pollution incident involving offshore oil and gas infrastructure.
Information Communication Technology	ICT	Technologies that provide access to information through telecommunications.

International Aeronautical Maritime Search and Rescue	IAMSAR	Jointly published by IMO and the International Civil Aviation Organization (ICAO), the three-volume IAMSAR Manual provides guidelines for a common aviation and maritime approach to organizing and providing search and rescue (SAR) services.
Joint Decision Model	JDM	Joint emergency services model specified by JESIP as consistent method for Commanders to help bring together the available information, reconcile objectives and make effective decisions.
Joint Emergency Services Interoperability Programme	JESIP	A programme aiming to improve the way in which the blue light services work together at major and complex incidents.
Joint Nature Conservation Committee	JNCC	A public body that advises the UK Government and devolved administrations on UK-wide and international nature conservation.
Joint Rescue Coordination Centre	JRCC	The main operations centre, staffed by coastguard, located at Fareham in Hampshire. The JRCC sits at the hub of UK-wide network of operations centres, monitoring the national picture, adjusting work distribution throughout the network, and providing command, control, coordination and communication functions for offshore or coastal emergency response. The JRCC aincludes the aeronautical rescue function.
Loggist		A trained individual allocated to take immediate minutes of discussion and ensure all actions allocated are fully recorded and are made transparent to all parties.
Marine Response Centre	MRC	A coordination centre established by the MCA in major maritime pollution cases requiring a national response. It may be co-located at a suitably equipped CGOC or port that supports the at sea response to a pollution and / or salvage operation.

Marine Scotland Duty Officer	MSDO	A point of contact within Marine Scotland for a marine emergency, including oil and or chemical pollution incidents from shipping and offshore installations (and the application of chemical dispersants and deployment of containment equipment) and marine mammal strandings.
Maritime & Coastguard Agency	MCA	An Agency of the Department of Transport.
Maritime Rescue Coordination Centre	MRCC	Strategically located operations centre, staffed by coastguard as part of a UK-wide network of centres, monitoring the regional picture, adjusting to flexible work distribution controlled by the JRCC, coordination and communication functions for offshore or coastal emergency response.
METHANE	METHANE	Joint Emergency Services major incident reporting methodology specified by JESIP as consistent method of sharing incident information; Major emergency. Exact location. Type of incident. Hazards Access. Number of casualties. Emergency services.
Microsoft Teams	MS Teams	Microsoft Teams is a persistent chat-based collaboration platform complete with document sharing, online meetings, and many more extremely useful features for business communications.
National Contingency Plan	NCP	A plan that ensures a timely, measured and effective response to Marine Pollution from Shipping and Offshore Installations incidents.
Office of the Chairman and Chief Executive	OCCE	The senior management branch within the MCA.
Offshore Energy Liaison Officer	OELO	An advisory HM Coastguard role, supporting the national network with advice, guidance and resource during complex offshore energy incidents.

Offshore Petroleum Regulator for Environment and Decommissioning	OPRED	OPRED is part of BEIS and is responsible for regulating environmental and decommissioning activity for offshore oil and gas operations, including carbon capture and storage operations, on the UK continental shelf.
Oil Spill Response Limited	OSRL	Industry-funded cooperative which exists to respond to oil spills wherever in the world they may occur, by providing preparedness, response, and intervention services.
Operations Control Unit	SCU	A unit established to support SOSREP during oil and gas source control incidents.
Platform Supply Vessel	PSV	A support vessel transporting liquid and deck cargo to and from oil and gas installations.
Pollution Report	POLREP	A report of any known or potential pollution made by CGOC's / NMOC on receipt of a notification of pollution to ensure accurate and timely dissemination of information to relevant internal MCA and national authorities and organisations.
Power Business Intelligence	Power BI	Power BI is an interactive data visualization software product developed by Microsoft with a primary focus on business intelligence. It is part of the Microsoft Power Platform.
Resilience Direct		Resilience Direct is an online private 'network' which enables civil protection practitioners to work together – across geographical and organisational boundaries – during the preparation, response and recovery phases of an event or emergency.

Robert Gordon University	RGU	A university based in Aberdeen.
Royal National Lifeboat Institution	RNLI	The Royal National Lifeboat Institution is a charity that saves lives at sea, through lifeboat search and rescue, lifeguards, water safety education and flood rescue.
Scientific, Technical and operational advice notices	STOp	STOp notices provide guidance on counter pollution and salvage operational procedures,
Search and Rescue	SAR	The activity of looking for and rescuing people who are lost or in danger
Search and Rescue Mission Coordinator	SMC	The coastguard assigned to co-ordinate the response to an actual or apparent maritime distress situation, this function exists only for the duration of a specific SAR incident.
Secretary of States Representative for Maritime Salvage and Intervention	SOSREP	The Secretary of State for Transports representative with powers to intervene in major maritime emergencies by directing Masters, Owners, Operators and Harbours to take specific actions that preserve the safety of life and protection of the UK environment.
SharePoint	SharePoint	A web-based application that integrates with Microsoft Office primarily as a highly configurable document management and storage system.

Shetland Emergency Planning Forum	SEPF	The Shetland Emergency Planning Forum consists of Cat 1 and 2 Responders who meet regularly throughout the year to provide the communities of the Shetland Islands with a fully integrated, cohesive, efficient, and quality civil contingencies planning, management and response service.
Shetland Islands Council	SIC	Is the local authority for the Shetland Islands
Shoreline Cleanup and Assessment Technique		A systematic method for surveying an affected shoreline after an oil spill.
Situation Report	SITREP	A situation report is a form of status reporting that provides decision-makers and readers a quick understanding of the current situation. It provides a clear, concise understanding of the situation—focusing on meaning or context, in addition to the facts.
Special Advisors	SpAds	Are political appointees hired to support ministers.
Specific, Measurable, Achievable, Relevant and Time-bound	SMART	Acronym for setting goals and objectives
Strategic Commander	STRATCOM	A coastguard officer with strategic accountability for the integrity and discharge of HM Coastguard maritime, or coastal, operations within the UK area of interest including the international arena and strategic command control and management of the HM Coastguard national operations network, considering the risks presented to UK interests and citizens in the marine and littoral areas.

Strategic Coordinating Group	SCG	A multi-agency group of strategic commanders that takes overall responsibility for the multi-agency management of the emergency and to establish the policy and strategic framework within which lower tier command and coordinating groups will work.
Subsea Oil Storage Tank	SOST	A specially designed tank for the storage of produced oil prior to offloading to tankers.
Tactical Commander	TACOM	A coastguard officer with tactical management oversight and responsible for the quality of HM Coastguard operations, in either the functionally within the UK area of interest or within defined sub area(s) of the national or international area of operation.
Tactical Coordinating Group	TCG	A multi-agency group of tactical commanders that meets to determine, coordinate and deliver the tactical response to an emergency. Note: the TCG may also be known as the Silver Group.
Technical Advisor	TA	An independent specialist brought in by the SOSREP to provide advice during the response to an emergency.
Temporary Exclusive Zone	TEZ	Section 100A(1) provides power for the Secretary of State to designate a TEZ around a “ship, structure or other thing”.
Trello		Project management tool, used during this exercise for media response management.
UK Search and Rescue Region		Following the adoption of the 1979 SAR Convention, IMO's Maritime Safety Committee divided the world's oceans into 13 search and rescue areas, in each of which the countries concerned have delimited search and rescue regions for which they are responsible.

United Kingdom	UK	The United Kingdom of Great Britain and Northern Ireland, commonly known as the United Kingdom
Very High Frequency	VHF	VHF is a range of radio frequency electromagnetic waves (radio waves) from 30 to 300 megahertz (MHz)
ViSION		The HM Coastguard incident management system

Appendix G - RGU media statement

The following statement was written by an RGU student based on the information they had gleaned during Day 1, in the style of a daily newspaper as it might have appeared on the morning of Day 2.

(for Thursday's first edition, byline Andreea Catelina)

Fears of an environmental disaster off Shetland were growing last night (Wed) as up to 250,000 barrels of oil continued spilling into the North Sea after a collision between a supply ship and an oil platform.

The Highland Knight vessel hit the Solan platform, located 84km off Shetland, shortly after 7.30am yesterday, before sinking and releasing debris which damaged a 300,000-barrel capacity subsea oil container.

Production was suspended while emergency efforts began to make safe the ship's wreckage and contain the oil spill, which had already spread across an area of more than 2km by 500m.

Steve Cox, executive vice-president of Harbour Energy, the platform's owner, confirmed last night that the leak could take days to control – with the risk that all 250,000 barrels of oil contained in the tank could spill. Mr Cox told a press conference last night: "If the leak is unchecked the tank will empty."

The Secretary of State's Representative for Maritime Salvage and Intervention, Stephan Hennig, said the oil spill was being tracked by remote surveillance cameras to monitor its potential environmental impact, with the help of Shetland Council. He added: "None of this is good but dealing with it in the appropriate way is the best we could do."

Following the collision, all 11 crew members of Highland Knight evacuated the stricken vessel on life rafts. Four crew members with non-life-threatening injuries were airlifted to Gilbert Bain Hospital, Lerwick, and one worker on the platform was taken to Balfour Hospital, Kirkwall.

Harbour Energy is the North Sea's largest independent oil production company, generating more than 200,000 barrels a day. The Solan platform, which cost an estimated £700m to build, currently produces 28,000 barrels daily.

Fifteen non-essential workers have been airlifted off the platform by industry helicopters, leaving 11 core workers on board.

The following helpline number has been set up for anyone concerned about relatives involved in the incident: xxxxx.

Ends

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