



Maritime &
Coastguard
Agency



Department
of Energy &
Climate Change



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

Exercise Report



**The National Contingency Plan. A
Strategic Overview for
Responses to Marine Pollution
from Shipping and
Offshore Installations.**

Exercise Dragon

**10th and 11th September
2014**



Exercise DRAGON Exercise Report



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Exercise DRAGON Exercise Report



Preface

Exercise DRAGON was a live multi-agency Oil Spill Response Exercise designed to test the United Kingdom's (UK) National Contingency Plan - A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations (NCP).

The exercise held on 10th and 11th September 2014 involving over 180 participants from 39 organisations operating across 15 different response cells in Liverpool, London, Cheshire, Warrington, North Wales and Milan.

Analysis indicates that the exercise was successful and that the UK NCP ensures that there is a timely, measured and effective response to incidents of marine pollution from shipping and offshore installations and their aftermath.

The Exercise Director and core planning team have compiled this exercise report using comments from the evaluators, exercise controllers and participants.

The comments received have been analysed by the planning team and broken down into recommendations and proposals. Recommendations are actions assigned to the Maritime & Coastguard Agency (MCA) or Department of Energy and Climate Change (DECC) as the exercise Sponsors have authority to direct these organisations.

The Exercise Sponsors have no authority to direct other organisations to take any action, therefore, proposals have identified in lieu of recommendations. Some of the proposals are aimed at the wider response community and not just those who participated in the exercise, therefore recommendations would be inappropriate.

A separate monitoring group is to be established and chaired by the MCA to oversee the progress, outcome and conclusion of the recommendations and proposals. As recommendations and proposals are progressed, annexes B and C to this report will be kept updated. Final sign off will be by the exercise Sponsors.

I would like to thank all those involved in the planning and execution of Exercise Dragon. Without their expertise and dedication the exercise would not have been a success.

I would also commend all of the exercise participants who entered into the spirit of the exercise, treating it as if it were a real incident and making it a successful learning experience for everyone.

Iain Campbell
Exercise Director

Contents

Preface	3
1. General	5
1.1. Version History	5
1.2. Distribution List	6
1.3. Glossary	7
2. Introduction	8
3. Aim	
4. Objectives & Success Criteria	8
4.1. Maritime and Coastguard Agency (MCA)	8
4.2. Department of Energy and Climate Change (DECC)	9
4.3. SOSREP	9
4.4. eni LBOC	9
4.5. Media	9
4.6. Welsh Government	9
4.7. Natural Resources Wales	9
4.8. North Wales Police	10
4.9. North Wales Fire and Rescue Service	10
4.10. Joint North Wales Local Authorities	10
4.11. Environment Agency	10
4.12. Cheshire Resilience Forum	10
5. Exercise Sponsors	11
6. Exercise Director	11
7. Exercise Planning Team	11
8. Exercise Scenario	12
8.1. Exercise Participants	13
9. Exercise Conduct	14
10. Exercise Controllers and Command Cell	14
11. Exercise Evaluation	16
12. Observers	16
13. Media Operations	17
14. Live Media	17
15. Media Evaluation	17
16. Safety	17
17. Evaluation Process	18
18. Evaluation Summaries	20
Annex A: Media evaluation conducted by Steelhenge	49
Annex B: Summary of Recommendations	52
Annex C: Proposals and Best Practice	55

1. General

1.1. Version History

Date	Version	Author	Author Initials	QA Assessor	QA Date	QA Initials
13/01/15	1.0	Iain Campbell	<i>IC</i>			
28/01/15	2.1	Colin Mulvana	<i>CM</i>	Iain Campbell	29/1/15	<i>IC</i>
13/02/15	2.2	Dominic Stevens	<i>DS</i>	Michael Reid	15/2/15	<i>MR</i>
18/02/15	3.0	Colin Mulvana	<i>CM</i>	Michael Reid	19/02/15	<i>MR</i>
31/03/15	4.0	Iain Campbell	<i>IC</i>	Michael Reid	01/04/15	<i>MR</i>
13/04/15	4.1	Michael Reid	<i>MR</i>	Iain Campbell	14/04/15	<i>IC</i>
16/04/15	4.2	Iain Campbell	<i>IC</i>	Richard Parkes	16/04/15	<i>RP</i>

1.2. Distribution List

Name	Organisation
Iain Campbell	Maritime and Coastguard Agency
Michael Reid	Department of Energy and Climate Change
Colin Mulvana	SOSREP Unit
Steve Fraser	Department of Energy and Climate Change
Andy Lang	Petrofac Training Services
Lisa McAuliffe	Petrofac Training Services
Karl Hughes	eni LBOC
Roger Perkins	eni LBOC
Vanessa Haynes	Oil Spill Response Limited
Jason Loach	Braemar Howells
Jo Evans	Natural Resources Wales
David Andrew	Natural Resources Wales
Jim McKie	Marine Scotland
Cerys Percival	eni LBOC
Maggie Hill	Maritime and Coastguard Agency
Kevin Oates	Cheshire LRF
Gareth Watson	Denbighshire County Council
Gwyn Hughes	Gwynedd County Council
Andrea Pashley	North Wales Police
John Entwistle	eniUK
Stuart Hankey	Environment Agency
Richard Parkes	Maritime & Coastguard Agency
Wendy Kennedy	Department of Energy and Climate Change
Richard Martin	Maritime & Coastguard Agency

1.3. Glossary

CPSO	Counter Pollution and Salvage Officer
DECC	Department of Energy and Climate Change
EA	Environment Agency
EG	Environment Group
eni	Operator
ERRV	Emergency Response and Rescue Vessel
ERT	Emergency Response Team
HQ	Headquarters
HSE	Health and Safety Executive
IMT	Incident Management Team
IRT	Incident Response Team
JNCC	Joint Nature Conservation Committee
LBOC	Liverpool Bay Operating Company
LRF	Local Resilience Forum
MCA	Maritime and Coastguard Agency
MRC	Marine Response Centre
MRCC	Maritime Rescue Co-ordination Centre
MRT	Media Response Team
NCP	National Contingency Plan
NRW	Natural Resources Wales
NW	North Wales
OCU	Operations Control Unit
OIM	Offshore Installation Manager
OPEP	Oil Pollution Emergency Plan
OSI	Offshore Storage Installation
OSRL	Oil Spill Response Limited
ePON1	electronic Petroleum Operations Notice No.1
PTS	Petrofac Training Services
SCC	Strategic Co-ordination Centre
SCG	Strategic Co-ordinating Group
SEG	Standing Environment Group
SOSREP	Secretary of State's Representative
STAC	Scientific and Technical Advisory Cell
TCG	Tactical Co-ordinating Group
UK	United Kingdom
UKCS	United Kingdom Continental Shelf

2. Introduction

Exercise DRAGON was a live multi-agency Oil Spill Response Exercise designed to test the United Kingdom's (UK) National Contingency Plan - A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations (NCP).

The Maritime and Coastguard Agency (MCA) and the Department of Energy and Climate Change (DECC) required confirmation that the agreed recommendations from Exercise Sula, held in May of 2011, with regard to improved practices, procedures and processes have been implemented, and that improvements have been put in place as a result of these recommendations.

The exercise was conducted in real time over two days, Wednesday 10th and Thursday 11th September 2014. It focused on: counter pollution response to oil at sea; shoreline response and the activities required to control the source of the spill. The severity of the scenario was designed to activate the operational, tactical and strategic levels of the various responding organisations in alignment with the National Contingency Plan (NCP) and stakeholder specific response documentation.

The incident was associated with an offshore oil and gas facility operated in the Liverpool Bay area incorporating various offshore/ shoreline / onshore locations anticipated to be involved in a scenario of this nature.

In parallel with the exercise, there was a demonstration deployment of oil spill response equipment by Oil Spill Response Limited (OSRL) and Braemar Howells on the 11th September 2014 at Beacons Jetty on the Conwy Estuary. This included an over-flight of OSRL's aerial surveillance aircraft. In addition, a selection of MCA equipment was also displayed.

3. Aim

To exercise the UK's National Contingency Plan following a major document review in 2014 to ensure procedures and protocols contained therein are accurate and fit for purpose to effectively deal with a response to an oil spill incident of National significance involving offshore oil and gas infrastructure within the United Kingdom Continental Shelf (UKCS).

4. Objectives & Success Criteria

The objectives for each participating organisation were as follows:

4.1. Maritime and Coastguard Agency (MCA)

- 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 interaction between the MRC and other maritime and participating land based response cells.
 - To exercise interfaces and interdependences across all response levels, looking particularly at Environment Group (EG), Scientific and Technical Advisory Committee (STAC) functions, cross-government and inter-agency liaison, and the co-ordination of public communication arrangements.
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4.2. Department of Energy and Climate Change (DECC)

- To test and assess whether the eni LBOC OPEP achieves an integrated approach between DECC, MCA, SOSREP, eni LBOC and other stakeholders in responding to a major pollution incident.
- To share lessons identified for learning from the exercise with Oil and Gas UK members.

4.3. SOSREP

- To exercise the SOSREP function within Government in relation to a major incident involving an offshore installation.
- To establish an Operations Control Unit (OCU) and exercise the interaction between the OCU and other maritime and participating land-based response cells in accordance with the National Contingency Plan and in relation to a major incident involving an offshore installation.
- To exercise cross government communications.

4.4. eni LBOC

- To test Liverpool Bay Oil Pollution Emergency Plan and demonstrate that eni LBOC can effectively respond to a major oil spill in UKCS.
- To ensure eniUK London and HQ Milan integrate effectively to provide cross organisational support for response to a major oil pollution event.
- To test the interface between Braemar Howells and Oil Spill Response Limited and subsequent interaction with local councils and agencies.

4.5. Media

- To test the DECC media response with MCA and eni media personnel, including deployment and liaison with MCA media personnel.
- To test the links between Welsh Government and the SCG on communications and media handling.
- To test ability to coordinate response to traditional and social media.

4.6. Welsh Government

- To test the internal cascade system and the briefing process to Welsh Ministers.
- To test the deployment of the North Wales Liaison Team and communication links between them and the Emergency Co-ordination Centre (Wales) and the Strategic Co-ordinating Group (SCG).

4.7. Natural Resources Wales

- To test the ability of NRW to respond to a major multi-agency marine pollution incident, in line with its stated performance commitments both within Wales and in relation to cross border working with agencies in England.
- To test the NRW response to a request to establish and sustain the operation of an Environment Group to advise other responders.

- To evaluate NRW procedures and expertise in regulating and advising on the movement of controlled and hazardous waste arising from a major maritime incident, especially looking at cross-border regulation processes.

4.8. North Wales Police

- To test the activation of the Strategic Coordination Centre (SCC) at Police HQ including the deployment of Silver/Gold Commander to act as initial Chair of the SCG/TCG meetings.
- To assess the implications for the police and facilitate communication between the Police Commanders and all other stakeholders.
- To handover the Chairman role for the TCG meetings at an appropriate time.

4.9. North Wales Fire and Rescue Service

- To provide representation at SCG and Tactical Co-ordination Group (TCG).
- To provide guidance and support to specialist cells and groups.
- To assess risks and deploy resources (notionally) in support of other potential direct and indirect risks created onshore by the incident.

4.10. Joint North Wales Local Authorities

These objectives cover Conwy County Borough Council, Denbighshire Country Council and Flintshire County Council

- To test the Local Authorities' ability to respond to a major multi-agency incident.
- To test inter agency liaison.
- To test protocols for waste management – hazardous waste disposal.
- To identify recovery issues.

4.11. Environment Agency

- To test the ability to respond to a major multi agency marine incident requiring cross border working between England and a devolved administration.
- To test procedures in regulating, advising and the movement of a controlled hazardous waste with cross border regulation.
- To test coordinated information flow between cross border regulatory agencies and between Environment Groups.

4.12. Cheshire Resilience Forum

- To test the communication links with the lead SCG and consider interface / support that may be required.
- To test cross border response and recovery to a coastline pollution incident having regard to the environmental impact (clean-up).

5. Exercise Sponsors

Exercise Dragon was sponsored by the MCA and DECC. The Sponsor organisations were accountable for the delivery of the event and for ensuring lessons are captured and commensurate corrective actions / solutions are implemented.

For Exercise Dragon Wendy Kennedy, Director, Offshore Environment & Decommissioning represents DECC and Richard Parkes, Director of Maritime Operations, MCA.

6. Exercise Director

Iain Campbell was appointed Exercise Director for Exercise Dragon. The Exercise Director is accountable to the Sponsors for the preparation and delivery of the exercise. This included: planning, exercise play, ensuring an exercise risk assessment is produced and post exercise reporting. During the planning phase the Exercise Director maintained an overview and ensured that the competing or conflicting objectives of the various agencies met the overall exercise aim.

7. Exercise Planning Team

The exercise planning team assigned to Exercise Dragon was responsible for planning and co-ordinating the exercise. The team comprised representatives from DECC, Secretary of State's Representative for Maritime Salvage and Intervention, MCA, eni, Natural Resources Wales (NRW), Petrofac Training Services (PTS) and Oil and Gas UK. Other experts were also invited to provide input throughout the planning process, when required.

The table below identifies the Core Planning Team.

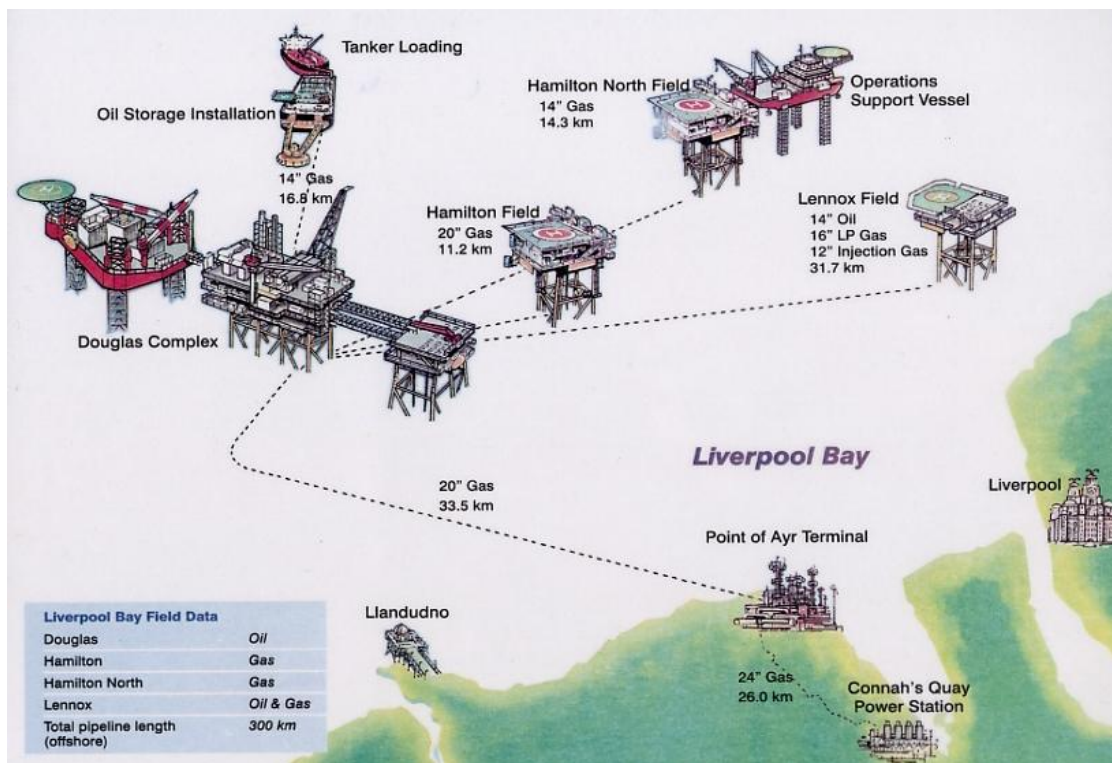
Core Planning Team		
Name	Role	Organisation
Iain Campbell	Exercise Director	Maritime and Coastguard Agency
Michael Reid	Exercise Director	Department of Energy and Climate Change
Colin Mulvana	Exercise Director	SOSREP Unit
Steve Fraser	Planning Team Member	Department of Energy and Climate Change
Andy Lang	Exercise Consultant	Petrofac Training Services
Lisa McAuliffe	Exercise Consultant	Petrofac Training Services
Karl Hughes	Planning Team Member	eni LBOC
Roger Perkins	Planning Team Member	eni LBOC
Dominic Stevens	Exercise Secretariat	SOSREP Unit
John Rintoul / Mick Borwell	Oil & Gas UK	Oil & Gas UK
Maggie Hill	Media Planning Lead	Maritime and Coastguard Agency

8. Exercise Scenario

The scenario for this exercise was situated in Liverpool Bay involving the Offshore Storage Installation (OSI) operated by eni LBOC.

Oil produced by the Douglas Complex is transferred to the OSI via a subsea pipeline, prior to being offloaded onto a shuttle tanker. The OSI is a double-sided vessel with ten cargo tanks flanked by segregated seawater ballast tanks. It has an 800m exclusion zone that is continuously monitored by radar and patrolled 24hrs a day by a dedicated support vessel.

The exercise scenario involved the unlikely event of an explosion on board the OSI that ruptured three adjacent tanks and the hull. This allowed for a loss of oil to sea with the potential for on-going pollution.



8.1. Exercise Participants

The following list identifies the Organisations and Companies that participated in this exercise.

- Airbus
- Bond Offshore Helicopters
- Braemar Howells
- Centre for Environment, Fisheries & Aquaculture Science (CEFAS)
- Cheshire Fire and Rescue Service
- Cheshire Police
- Department of Energy and Climate Change
- eni Northop London and Milan
- Environment Agency
- Food Standards Agency
- Local Authorities
 - North Wales and North West England; Cheshire West and Chester Council; Halton Borough Council; Warrington Borough Council; Conwy County Borough Council; Denbighshire County Council; Regional Emergency Planning Service and Flintshire County Council
- Mammoet Salvage
- Marine Management Organisation
- Marine Scotland (ePON1 only)
- Maritime and Coastguard Agency
 - MRCC Liverpool, MRCC Holyhead and Counter Pollution and Salvage Branch
- Natural England
- Natural Resources Wales
- North Wales Fire and Rescue Service
- North Wales Police
- Oil Spill Response Limited
- Point of Ayr Security (eni LBOC)
- Ports and Harbours
 - Peels Ports (Liverpool); Dee Conservancy Harbour; Mostyn Harbour; Stena (Holyhead).
- PTS Emergency Response Operator (Aberdeen)
- Public Health England
- Public Health Wales
- Reconnaissance Ventures Limited (RVL)
- RWE
- Secretary of State's Representative (SOSREP)
- Steelhenge
- The Stewart Group (Vessel Brokers)

9. Exercise Conduct

A series of pre-scripted injects were fed into the exercise from various sources to ensure the response organisation was activated and the issues to be addressed were raised. The Exercise Controllers managed the pace of the exercise and the number of injects in order to stimulate “live play” and to replicate a realistic deteriorating situation.

Participants were expected to respond to the situation as it unfolded; to react realistically to the developing situation by fulfilling their roles as normal and to develop responses as if it were an actual incident. All agencies responded in ‘real time’ during the exercise although there was some pre-positioning of personnel to ensure maximum benefits were realised from exercise play.

Where additional assets and resources were requested or expected to be involved, these were simulated. Where appropriate, controllers monitored such activity and, with the Exercise Command Team, ensured notional assets are represented as appropriate.

To ensure the exercise developed during the course of the event, a number of elements associated with the scenario such as weather conditions were artificially simulated.

Participants received ‘Exercise Briefing Notes’ to indicate those elements. Controllers and role-players were clear where the artificiality lay and if need be, provided clarification for those participating. Some injects such as weather forecasts and satellite imagery were available from the Exercise Command Team as and when requested to ensure responders sought information in a more realistic manner.

Participants were reminded that exercise artificialities are determined in order to facilitate the overall conduct and progress of the exercise scenario.

10. Exercise Controllers and Command Cell

The Exercise Director and Exercise Controllers manned the Command Cell. They were responsible for co-ordinating exercise activity and were ultimately responsible for ensuring that the main events list was played in accordance with the timeline. However, flexibility allowed the Controllers to use their own judgement and experience in timing the specific inputs.

Intervention by any of the command team was minimal and a last resort, as the players needed time to rectify problems and take necessary action. They only intervened when clarity about the scenario or advice was required to allow the participants to continue.

Exercise controllers who were directed by the Command Cell were strategically located at the relevant response centres to ensure the exercise was kept in line with expectations.

The table below identifies the Exercise Controllers and their respective locations.

Exercise Controllers		
Name	Location	Organisation
Iain Campbell	Command Cell, eni LBOC, Northop	Maritime and Coastguard Agency
Michael Reid	Command Cell, eni LBOC, Northop	Department of Energy and Climate Change
Colin Mulvana	Command Cell, eni LBOC, Northop	SOSREP Unit
Steve Fraser	Operations Control Unit, eni LBOC, Northop	Department of Energy and Climate Change
Andy Lang	Command Cell, eni LBOC, Northop	Petrofac Training Services
Lisa McAuliffe	Marine Response Centre, Northop Hall	Petrofac Training Services
Karl Hughes	Incident Management Room, eni LBOC, Northop	eni LBOC
Roger Perkins	Command Cell, eni LBOC, Northop	eni LBOC
Vanessa Haynes	Beacons Jetty, Conwy	Oil Spill Response Limited
Jason Loach	Beacons Jetty, Conwy	Braemar Howells
Jo Evans	Environment Group, NW Police HQ / North Wales TCG	Natural Resources Wales
David Andrew	Environment Group, NW Police HQ	Natural Resources Wales
Jim McKie	Environment Group, NW Police HQ	Marine Scotland
Cerys Percival	eni LBOC MRT, Northop	eni LBOC
Kevin Oates	Cheshire TCG, Police HQ Cheshire	Cheshire LRF
Gareth Watson	Media Cell, NW Police HQ	Denbighshire County Council
Gwyn Hughes	North Wales, TCG, NW Police HQ	Gwynedd County Council
Andrea Pashley	North Wales, SCG, NW Police HQ	North Wales Police
John Entwistle	eniUK ERT London	eniUK
Stuart Hankey	North West England EG, Warrington	Environment Agency
James Repp	Role-Player Co-ordinator, Aberdeen	Petrofac Training Services

11. Exercise Evaluation

The MCA assigned an Evaluation Co-ordinator for Exercise Dragon. A team of evaluators from a range of participating agencies were recruited to evaluate the key response teams during the exercise in accordance with the evaluation criteria to determine to what degree the objectives have been achieved.

The completed evaluation reports were submitted to the Evaluation Co-ordinator for collation. The Evaluation Co-ordinator concluded what lessons have been identified for improvement and submitted recommendations to be considered for inclusion in the final report.

Exercise Evaluators		
Name	Location	Organisation
Sue Todd	Not present for the exercise	Maritime and Coastguard Agency
Daniel Longhurst	IMT, eni LBOC, Northop	eni LBOC
Erik Leslie	OCU, eni LBOC, Northop	Department of Energy and Climate Change
Jim M ^c Kie	EG, NW Police HQ	Marine Scotland
Alan Wilton	SCG & TCG, NW Police HQ	Lancashire LRF
Ben Alderson	EG, NW Police HQ	Lancashire LRF
John Entwistle	eniUK ERT London	eniUK
Fiona Hastie	MRC, Northop Hall, Northop	Maritime and Coastguard Agency
Bernie Bennett	Eni LBOC IMT, Northop & Equipment Deployment, Conwy	Morlich Services obo on behalf of Oil & Gas UK
Stuart Hankey	North West England EG, Warrington	Environment Agency
John Hope	MRCC Liverpool	Maritime and Coastguard Agency
Jim M ^c Williams	Exercise Command Cell, Northop	Maritime and Coastguard Agency
Kevin Oates	Cheshire TCG, Police HQ Cheshire	Cheshire LRF

12. Observers

Observers were invited to both days of the exercise and were hosted by two Observer Co-ordinators from DECC who provided commentary on the exercise and collated any comments submitted by the observers for inclusion in the final report.

13. Media Operations

The media response operations were managed and co-ordinated by the MCA, who also took the lead with exercise media planning.

There was live traditional and social media play during day one of the exercise. Key agencies participated from the media response cell located at the Police HQ in Colwyn Bay and other office bases in London, Southampton and Milan. As decided early in the planning stage, on day two of the exercise the media teams were involved with the equipment demonstration and therefore there was no exercise media play.

The table below identifies the Media Sub Group members.

Media	
Name	Organisation
Maggie Hill	Maritime and Coastguard Agency
Cerys Percival	eni LBOC
Gareth Watson	Denbighshire County Council
Michelle Furlong	eniUK
Laura Ackland	Oil & Gas UK
Sophie Willett	Department of Energy and Climate Change

14. Live Media

As the lead authority, the MCA Press Office agreed a pre-exercise 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. MCA Press Office also prepared a range of exercise materials that included information for local authority contact centres. They also coordinated the media facility at the counter pollution equipment deployment on day two of the exercise.

15. Media Evaluation

This aspect of the exercise was subject to a separate report. See Annex A.

16. Safety

All participants in Exercise Dragon had responsibility for their own and others' safety - including the public. There were no injuries and no damage to the environment during the exercise.

17. Evaluation Process

Twelve organisations submitted objectives for the exercise and a total of ten cells / groups were initially identified for evaluation.

The following were evaluated during the exercise:

- Cheshire Tactical Co-ordinating Group (TCG)
- Department of Energy and Climate Change - Operations Control Unit (OCU)
- eni LBOC - Incident Management Team (IMT) - Northop
- eniUK - Emergency Response Team (ERT) - London
- Maritime and Coastguard Agency - Marine Response Centre (MRC)
- Multi-agency Media Response *
- North West England Environment Group (EG)
- North Wales Environment Group (EG)
- North Wales Strategic and Tactical Co-ordinating Groups (SCG and TCG)
- Secretary of State's Representative - Operations Control Unit (OCU)

Cell / group evaluators were selected for their expertise and knowledge in a particular field as well as their knowledge of pollution and emergency response procedures in general.

This expertise and knowledge was a key element to ensuring there was a full and accurate evaluation on how response cells / groups and individuals reacted and whether respective roles and responsibilities were effectively fulfilled.

Evaluation areas and assessment criteria utilised during Exercise Sula (NCP Offshore Exercise 2011) were deemed to have worked well and so it was agreed that those same areas would be used for Exercise Dragon.

Where applicable, the evaluation areas and assessment criteria were generic and applied to all groups to enable across the board analysis. In those groups with specialist evaluation areas, bespoke assessment criteria were used, again as per Exercise Sula.

A separate set of success criteria was also used for each evaluation area to aid the evaluator.

Each evaluator was required to comment on whether an organisation's objectives had been achieved. In some cases this was an assessment over two or more cells.

** The Media response was evaluated separately and is attached as Annex A to this report.*

Areas for evaluation	
Evaluation Area	Cells Evaluated
Initial Alert	All
Initial Action	All
Establishment of Response Cells and Initial Response Strategy	All
On Going Response Strategy	All
Airborne Response	eni LBOC, OSRL, MRC
At Sea Response	eni LBOC, OSRL, MRC
Containment and Salvage Strategy	eni LBOC, OCU
Logistics/Finance.	All
Communications	All
Teamwork	All
Security	All
Handover (if appropriate)	All
Warning and Informing	Multi-agency Media Response

18. Evaluation Summaries

The following are summaries compiled by each evaluator.

The comments received have been analysed by the planning team and broken down into recommendations and proposals. Recommendations are actions assigned to the Maritime & Coastguard Agency (MCA) or Department of Energy and Climate Change (DECC) as the exercise Sponsors have authority to direct these organisations.

Proposals are the same as recommendations but as the Exercise Sponsors have no authority to direct other organisations to take any action, proposals have been made instead. Some of the proposals are aimed at the wider response community and not just those who participated in the exercise, therefore recommendations would be inappropriate.

Exercise Planning Team

What went well

In planning –

The scope and objectives of the exercise were clearly identified for the key exercise participants and became critical in forming the basis for the performance measurements.

The essential component parts associated with the planning process were identified and the necessary sub groups established to work through the activities. The planning team were very experienced in Exercise planning and many had first-hand knowledge of previous NCP Exercises namely Unicorn in 2008 and Sula in 2011 plus other major exercises.

The Planning Team contained the appropriate level of expertise to ensure all elements of the exercise were adequately prepared with good leadership during planning meetings either by the Chair or members of the team who deputised in the Chair's absence.

During the exercise –

The scenario and timeframe was realistic and engaged the entire exercise community. The scenario was continually updated to ensure all cells had sufficient response actions to keep them involved.

The documentation produced, fully supported all elements of the exercise and ensured that the role-played and artificial elements interfaced where appropriate with live play.

Assessing the performance of the participants was successfully captured utilising pre-prepared specific response cell measurement criteria and appropriately experienced Evaluators.

The preparation and format for “Day 2” of the exercise proved successful in occupying the teams for the duration of the exercise and fulfilling the performance expectations.

Additional scenario injects were generated by the planning team as and when required. The planning team executed the exercise by putting in place clear command and control arrangements with communication pathways for exercise directing staff and evaluators.

The debrief process developed for participants and the planning team proved successful in capturing the critical points and allowing the planning team to ensure the exercise ran in alignment with the objectives. A full debrief was held the morning after involving the core planning team.

Less effective

In planning -

With all personnel undertaking their respective daytime jobs, and the planning team being split geographically between Scotland, North Wales, Northwest and South of England, it was difficult at times for members to attend all of the planning meetings and conference call facilities were used.

MCA Counter Pollution Branch was not represented on the planning team due to resource constraints. This meant there was no direct input from the branch which may have impacted the development of the scenario.

Recommendation 1: All cells participating in future National Contingency Plan Exercises are to be represented on the planning team.	Assigned to: All participating organisations and authorities
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Distribution of the final exercise documentation was delayed due to late submission of information required from participating organisations. This caused additional pressures for the planning team on the day prior to the exercise. This also meant that some participants were unable to read exercise orders prior to commencement of the exercise.

Recommendation 2: All exercise documentation is to be completed, issued and distributed accordingly one week prior to commencement of the exercise.	Assigned to: Exercise Director
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During the exercise -

At the end of day 1 the Evaluation Co-ordinator was asked to phone each cell evaluator to gain an appreciation of any issues that needed to be resolved ahead of day 2. This was done but when fed back to the Exercise Director, the lead evaluator was advised that the information had been gleaned during the exercise directors meeting that had been held at the same time. Duplication of work should be avoided, particularly at the end of a long day.

eni LBOC Norththop - Incident Management Team (IMT)

Objectives

- To test the Liverpool Bay Oil Pollution Emergency Plan (OPEP) and demonstrate that eni LBOC can effectively respond to a major oil spill in UKCS.
- To ensure eniUK London and HQ Milan integrate effectively to provide cross-organisational support for response to a major oil pollution event.
- To test the interface between Braemar Howells and Oil Spill Response Limited and subsequent interaction with local councils and agencies.

The exercise objectives were achieved, with the principal learning being the additional resourcing required for the IMT in the event of a worst-case oil spill event.



Norththop Incident Management Team Room

What went well

The content of and the processes detailed within the OPEP were followed by the IMT and in general the plan was found to be robust. By mid-way through Day 2, the SOSREP was content/satisfied with the containment and salvage plans presented by eni LBOC.

The interaction between the IMT and the London Emergency Response Team (ERT) was effective and appropriate. The ERT listened by telephone to the IMT time-outs and this reduced, compared with previous internal exercises, the amount of time the IMT Leader had to personally spend on the phone to the ERT.

Oil Pollution Response Contractors Braemar Howells (BH) and OSRL worked effectively together with no evidence of competition or rivalry issues impairing the response. As the

Tier 2 responder BH were mobilised first and initially led the response. The BH representative subsequently moved into a supporting role once OSRL arrived on scene.

Less effective

It was clear that for an incident of this scale the IMT was significantly overloaded, even with additional positions present, which impaired the quality of the response. In particular the Co-ordinator and Admin roles were overloaded, despite two Co-ordinators being present and the Admin role receiving support from the HR roles.

Proposal 1: Consider additional personnel resource requirements to efficiently respond to an incident of national significance.	Assigned to: eni LBOC HSE Manager
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The containment and salvage plans initially presented to the SOSREP were insufficient in content. Better and/or earlier use could have been made by the IMT of OPEP supporting documents such as the Coastal Protection Plans (CPP). The level of awareness of the contents of the CPPs amongst key IMT Members (Leader, Coordinator, and Logistics) was lacking and should be improved.

Proposal 2: Members of the IMT should consider enhancing their familiarity with all contingency plans associated with an eni LBOC incident response	Assigned to: eni LBOC HSE Manager
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Communication between IMT and ERT Logistics reps should be improved as there were times when the ERT was mobilising resources of which the IMT was unaware.

Proposal 3: Consider developing an inter cell communications protocol to ensure important information is shared.	Assigned to: eni LBOC HSE Manager
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Some liaison officers were not fully aware of their role within the IMT.

Recommendation 3: Inclusion of Liaison Officers' roles and responsibilities within the National Contingency Plan and consider developing a generic training package for external organisations.	Assigned to: MCA Head of CPS Branch
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Proposal 4: Consider providing training on the roles and responsibilities of Liaison Officers	Assigned to: All stakeholder organisations
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Summary



Exercise DRAGON Exercise Report



The IMT generally worked well together, with the London ERT and with the OCU. However in a real event of this scale, the IMT would require additional personnel.

eniUK London - Emergency Response Team

Objectives

- To test the Liverpool Bay Oil Pollution Emergency Plan (OPEP) and demonstrate that eni LBOC can effectively respond to a major oil spill in UKCS.
- To ensure eniUK London and HQ Milan integrate effectively to provide cross organisational support for response to a major oil pollution event.
- To test the interface between Braemar Howells and Oil Spill Response Limited and subsequent interaction with local councils and agencies.

All objectives were achieved.



eniUK London ERT

What went well

Oversight of the status and plans for oil spill response action was effectively maintained by the eniUK London ERT through the regular time-out/status updates with the IMT.

The ERT provided support to the IMT for the Offshore Storage Installation (OSI) disconnect, salvage planning and planning for the mobilisation of additional eniUK personnel. This was done in anticipation of a prolonged, wide-ranging and extended period of response.

The eniUK London ERT notified and established effective and timely communications with eni HQ Milan as per procedure for a Level 3 incident, which was determined on the basis of the first notification from the IMT.

Communication to the eni HQ Milan was effectively managed via regular verbal updates and the provision/update of the standardised internal incident information forms.

A number of areas for guidance and support were identified and progressed, including:-

- Oil Spill modelling/GIS support using company systems
- Marine engineering support for disconnect and salvage planning
- Mobilisation to UK of environmental technical personnel and Company Executive Vice President
- Implementation of the company insurance and claims procedure.

Less effective

The specific support functions that may be required by eni LBOC from eniUK London during major spill scenarios could be more clearly defined within relevant documentation, procedures and briefing materials.

Procedures could better describe/define the specific support functions provided by eni HQ Milan, for increased effectiveness.

Proposal 5: Consider reviewing emergency response procedures	Assigned to: eniUK HSE Manager
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Time outs between the eniUK London Duty Manager and eni LBOC Emergency Response Manager could be better structured to improve the quality of information being communicated into eni HQ Milan.

In terms of Media response efficiency, the Holding Statements and Press Releases prepared by eni LBOC were reviewed by eniUK London before being passed to the eni HQ Milan media team for approval.

Initially this process resulted in significant bottle necks which delayed issue. A company media enquiry number was established, although again this took time to be released as part of an approved press release.

Proposal 6: Consider developing a consistent and efficient streamlined review process for media/press statement releases.	Assigned to: eniUK HSE Manager
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While other (non-Media) stakeholders were identified and communication requirements determined/actioned, not all stakeholders were actively role played with 'feedback' loops. Therefore the relationship/consistency of media release messages and information being provided, in parallel, to stakeholders was not fully evaluated.

The eniUK London rooms generally functioned adequately although provision of additional lap tops for personnel and quiet areas for verbal communications would support more effective communication with eni HQ Milan.

Summary

Overall, the eniUK London and the eni HQ Milan emergency response organisations were notified and activated effectively.

A good overall oversight was established and a range of specific areas for eniUK support actions identified and progressed.

The media/external communication roles of the eniUK London and HQ Milan teams were rigorously exercised by the DRAGON scenario and a number of learning points identified as proposals for action.

Department of Energy and Climate Change (DECC)

Objectives

- To test and assess whether the eni LBOC OPEP achieves an integrated approach between DECC, MCA, SOSREP, eniUK and other stakeholders in responding to a major pollution incident.
- To share lessons identified for learning from the exercise with Oil and Gas UK members.

All objectives were achieved

What went well

Following detection and notification of oil on sea and activation of the Douglas OSI Oil Pollution Emergency Plan (OPEP), eni LBOC reported the incident to the DECC On Call Inspector, which was recorded as per procedures detailed within the Department's Incident Response Manual (IRM).

DECC internal procedures were followed and there was effective communication throughout the initial reporting phase with the MCA Duty Counter Pollution and Salvage Officer (CPSO) and other stakeholders.

Based on the significance of the incident, the decision was reached that there was a requirement to inform the SOSREP. Thereafter, the SOSREP took the decision to establish the Operations Control Unit (OCU), which was set up at eni LBOC Northop House as detailed in the OPEP.

The deployment of two Inspectors allowed one Inspector to assume the role of Assistant to the SOSREP, once the OCU was established, whilst the additional Inspector remained with the eni LBOC IMT to monitor the developing situation and provide updates to the SOSREP, and others, as required.

Less Effective

The Douglas OSI Offshore Installation Manager (OIM) expressed concern regarding the length of the initial phone call with the DECC inspector. Communication of necessary incident information takes time an alternative, equally effective means of communicating this information could have been explored.

Recommendation 4: Review and improve method(s) of collecting incident data from the OIM and dissemination between regulators.	Assigned to: DECC Inspectorate Team Leader in consultation with MCA Head of CPS Branch
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Proposal 7: Consider appropriate delegation of incident reporting to regulating authorities.	Assigned to: Oil and Gas Industry
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A single ePON1 was received on Day 1 when further updates should have been provided. However four updates were received the following day.



Exercise DRAGON Exercise Report



Summary

The incident response undertaken by DECC personnel was in accordance with the Department's Incident Response Manual (IRM) procedures, from collection and transmission of initial incident information through to establishment and staffing of the Operation Control Unit (OCU) in support of the SOSREP. eni LBOC OPEP was referred to constantly and contents deemed fit for purpose.

Publication of this report will ensure lessons identified for learning from the exercise are shared with Oil and Gas UK members.

SOSREP / Operations Control Unit

Objectives

- To exercise the SOSREP function within Government in relation to a major incident involving and offshore installation.
- To establish an Operations Control Unit (OCU) and exercise the interaction between the OCU and other maritime and participating land based response cells in accordance with the National Contingency Plan and in relation to a major incident involving an offshore installation.
- To exercise cross Government communications.

All objectives were achieved



Operations Control Unit

What went well

The initial alerting and briefing of the SOSREP enabled the decision to establish an OCU at eni LBOC premises at Northop House. Confirmation that the OCU had been established was circulated by email using the Cell Activation Form.

At the first OCU meeting the eni LBOC representatives gave an overview of the current situation and immediate actions being undertaken by the company.

Thereafter, SOSREP sought confirmation from eni LBOC throughout the exercise as to their future plans in relation to potential for significant pollution, containment and salvage issues.

The SOSREP facilitated three 'Heads of Cells' meetings. These provided a forum for collation of summary information from the individual head of cells and provided supportive detail for the SOSREP's Strategic SITREPs (for ministers, senior management).

eni LBOC demonstrated a well-developed media strategy and delivered timely, clear press statements to the OCU for accuracy and consistency checks prior to public distribution.

Less effective

Initial provision of information by eni LBOC to the OCU was insufficient and lacked detail. The initial briefing provided by eni LBOC to the SOSREP and OCU members would have been clearer if more effective use had been made of visual aids such as drawings and maps.

Recommendation 5: Identify and list information required by the SOSREP in the OCU from Operators during incident response on the O&G UK Website	Assigned to: Deputy to the SOSREP
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eni LBOC proposed plan was not provided in writing to the OCU at the start of Day 2 as had been agreed at the final OCU meeting the previous day.

It appeared that some liaison officers were not fully aware of their role within the OCU.

Recommendation 3: Inclusion of Liaison Officers' roles and responsibilities within the National Contingency Plan and consider developing a generic training package for external organisations.	Assigned to: MCA Head of CPS Branch
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Proposal 4: Consider providing training on the roles and responsibilities of Liaison Officers	Assigned to: All stakeholder organisations
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Although eni LBOC internet connectivity was tested as part of the planning process once it was fully loaded during the exercise internet connectivity was found to be intermittent

Recommendation 6:	Assigned to:
OCU facility requirement to be reviewed and updated in the appropriate regulatory guidance	DECC Offshore Inspectorate Team Leader in consultation with Deputy to the SOSREP

Summary

The OCU was well organised and provided an effective forum for the SOSREP to monitor and evaluate eni's response to the incident. Meetings were chaired by the SOSREP in a controlled manner utilising well established practises and procedures.

The DECC administrative support team ensured information was recorded and disseminated appropriately, documents were logged in accordance with procedure. Regular situation reports were issued by the SOSREP, and regular briefings issued by the DECC Strategic Advisor, ensured government and others were informed of current and future plans being undertaken by eni in response to a major pollution incident.

Communications between response cells were not fully effective initially, although as liaison officers became more familiar with their roles improvement was evident.

Maritime and Coastguard Agency (MCA)

Marine Response Centre (MRC)

Objectives

- 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 interaction between the MRC and other maritime and participating land based response cells.
- To exercise interfaces and interdependences across all response levels, looking particularly at the Environment Group (EG), Scientific and Technical Advisory Cell (STAC) functions, cross Government and inter-agency liaison, and the co-ordination of public communication arrangements.

Objectives were partially achieved. The interaction between the MRC and other maritime and participating land based response cells was inadequate.

What went well

Command and control of the team was robust. This was established from the outset and as a result those within the Marine Response Centre (MRC) and those joining were clear on who was in charge. This was evident at the outset of the exercise when information on the pollution incident was slow in being provided to the MRC. The Head of Cell exercised governance over all MRC decisions.

Once individual roles and responsibilities were delegated, MRC personnel worked professionally ensuring that tasks were completed in time for the next briefing. External agency's in the MRC all worked well and ensured their respective information was communicated into the cell as appropriate.

In general the briefings went well. The timing of briefings was notified in advance, although there was some slippage. At the end of the briefing tasks and actions were allocated to individual team members. Overall there was an appropriate number of briefings and their duration was considered adequate.

A response strategy was discussed during the initial stages with a large number of vessels being tasked to respond. Appropriate vessels were activated and one was appointed as the On Scene Co-ordinator (OSC).

Security of the MRC was controlled by the use of a signing in/out form from the commencement of the exercise. However there was a lack of consistency in its use but at no point was the security of the room compromised.

The RVL liaison Officer provided a briefing on airborne assets and created the link to mobilise surveillance and spraying aircraft. A Temporary Restriction of Flying Regulations (TRFR) was discussed at an early stage for aircraft safety.

Less effective

Use of dispersant spraying was very quickly suggested but necessary approvals were not obtained from DECC before spraying commenced. Dispersant use was queried later in the day by eni LBOC and OSRL who were unaware that spraying had taken place.

Recommendation 7: National Contingency Plan to be reviewed to ensure the protocol for dispersant spraying approval on pollution from offshore infrastructure is clear and unambiguous	Assigned to: MCA CPS Head of Branch in consultation with DECC Environmental Management Team Leader
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Pertinent information was not shared in a timely manner within the room because some team members kept information to themselves until the scheduled briefings.

Briefings continued to take place and kept the same structured approach from the Head of Cell. However, in some, it was noted some members were answering their phones which disrupted the flow of the briefing and meant that they missed some vital information.

The use of room equipment was not used to its full potential. The electronic incident log was considered not fit for purpose. There was a lack of relevant information displayed to be of use to the members of the cell. On day 2 a new form was designed and relevant information was logged electronically. The use of flipcharts was unstructured throughout, resource names were added but again, without tasking and timings they were of little use.

ICT was a serious issue throughout the exercise for the MRC as a consequence of the location. Two MCA ICT staff arrived for day 2 and resolved some of the issues.

Recommendation 8: Consider reviewing, or developing, general etiquette and protocols for members conduct during team briefings. Conduct a review of working practices with regard to information management and the use of paper and electronic materials. Consider developing a procedure for MCA ICT staff members to be deployed at the onset of a major incident when an MRC is established.	Assigned to: MCA Head of CPS Branch
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There appeared to be no set structure for information exchange between cells other than the Head of Cell meeting. This became evident on day 2 when due to lack of information exchange OSRL and eni LBOC had an "off the table" discussion with MCA. There was a clear concern they were not being involved in decision making and required a better understanding of how outgoing information was being managed. Thereafter a SITREP was produced.

Recommendation 9: Ensure that appropriate processes are in place to facilitate the exchange of information between response cells.	Assigned to: MCA Head of CPS Branch
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Some liaison officers were not fully aware of their role within the MRC.

Recommendation 3: Inclusion of Liaison Officers' roles and responsibilities within the National Contingency Plan and consider developing a generic training package for external organisations.	Assigned to: MCA Head of CPS Branch
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Proposal 4: Consider providing training on the roles and responsibilities of Liaison Officers	Assigned to: All stakeholder organisations
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Summary

Overall there was clear command and control within the MRC. Personnel were clear in what their objectives were. ICT was once again a huge issue but because of this, much better use should have been made of paper based logs and charts, all of which were immediately available. Information flow to other cells could have been improved but the Head of Cells meetings were useful for sharing information. Overall, personnel worked effectively in achieving the overall aims and objectives of the MRC.

North West England (NWE) Environment Group (EG)

Objectives

- Test the ability to respond to a major multi-agency marine incident requiring cross border working between England and a devolved administration.
- Test procedures for cross border regulation, advice and movement of a controlled hazardous waste.
- Test the co-ordination of information between Environment Groups and cross border regulatory agencies.

The evaluator considered objectives 1 and 2 have been satisfactorily met.

A full assessment against the cross border regulation between cross border agencies objective was unable to be conducted. This was due to insufficient quantities of waste being generated during the clean-up activities on Day 2. Planning did not provide sufficient waste to overwhelm the disposal strategy put in place.

Recommendation 10:	Assigned to:
Generic Table-Top exercise to be developed to test procedures for cross-border transportation of waste.	MCA CPS Branch Scientific Lead



What went well

MCA Environmental Scientist requested the establishment of the Environment Group; the request also included summary of information before the formal receipt of the POLREP and confirmation of subsequent contact arrangements.

The initial alerting procedures of notifying the Standing Environment Group (SEG) chair worked well, the subsequent notifications to the NWE EG members worked well and were performed in a timely manner. The notification to the NWE EG members included the

timings of when the group would hold an initial meeting. When the group convened it was apparent the group quickly settled in to the roles assigned by the chair.

Good cross border liaison with the North Wales EG chair advising NWE EG being convened and courtesy notification to the Scottish SEG chair to advise NWE EG was operational.

The NWE EG was chaired by the Environment Agency throughout the exercise, using different chairs on each day. The initial meeting set Strategic Objectives for the group including the explanation of the roles and responsibilities of the attendees and the groups Liaison Officers nominated to attend cross border response cells. The group commented on the excellent chairing skills of the chair on both days demonstrating calm leadership enabling the group to be efficient with good delegation of responsibilities.

The group considered the administrative support roles within the group invaluable, during both days the team worked very well as group demonstrating a high level of interaction. The group demonstrated good record keeping and meeting minutes this was facilitated by the administrative support role within the group.

Good use of technology was used within the group, which benefited from the attendance of a PREMIAM representative this was considered by all invaluable in the response by the group. The EG benefited from face to face meetings, telecom arrangements were used for organisations unable to attend in person within the EG this was proved to be effective and fit for purpose. The NWE EG response cell was based within an Environment Agency Incident room and was considered to be beneficial by the group due to the equipment and connectivity options available for each attending organisation.

Good cross border liaison between the EA representation in the NWE EG and the North Wales TCG regarding cross border waste regulation and enforcement. On day two there was effective liaison between the cross boundary EG's via the Environment Liaison Officers (ELOs) liaising direct with each other. This was as a result of learning from Day 1 challenges for the North Wales ELOs in the NWE EG being unable to contact the North Wales EG. Day 2 of the exercise provided the opportunity for NWE EG to work with Cheshire TCG, who ran a 'bolt on' LRF exercise.

Less effective

During Day 1 the NWE EG was starting to consider potential waste management issues but the NWE EG EA representative was unable to liaise cross border due to North Wales TCG not being in play until day 2. This resulted in being unable to agree a cross boundary waste minimisation strategy.

Difficulty was experienced in providing information to Cheshire LRF due to the timings and duration of meetings held at the TCG. This was not unexpected as there will always be different operational cell Battle Rhythms in operation. However, it confirmed the need to always have a system in place for receiving operational information when the TCG is meeting.

Joint cross border Public Health messages were agreed by EGs and submitted for use within external media statement. However, when the media statement was released by eniUK it was discovered that incorrect Public Health information had been published.

Both EGs were considering similar aspects of the response liaising through the ELO or direct between partner organisations within the EGs at the same time and this resulted in a duplication of work. The NWE EG considers for a cross boundary EG response, it would be advantageous and highly recommended to have a single joint cross boundary Environment Group in operation. This would facilitate a more efficient effective response, while still enabling cross boundary considerations within the response.

Recommendation 11: National Contingency Plan to describe a process which will facilitate the working relationship between multiple EG's.	Assigned to: MCA CPS Branch Scientific Lead
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Summary

The NWE Environment Group was effectively chaired by the Environment Agency on both days with all members of the group fully engaged and proactive in response. During the two day exercise the communications strategy between the groups for the ELOs changed following learning from Day 1 which maximised the communication between the groups. Due to the response strategy taken for waste clean-up within the North Wales response, this limited the ability to fully explore the cross border regulation between regulatory organisations.

North Wales Environment Group (EG)

Objectives

- To test the ability of the Natural Resources Wales (NRW) to respond to a major multi-agency marine pollution incident in line with its stated performance commitments both within Wales and in relation to cross border working with agencies in England.
- To test NRW response to a request to establish and sustain the operation of an Environment Group to advise other responders.
- To evaluate NRW procedures and expertise in regulating and advising on the movement of controlled waste arising from major maritime incident, especially looking at cross-border regulation processes.

The evaluator considered objectives 1 and 2 set for the environment group have been satisfactorily met.

The Roles and Responsibilities of the EG as set out in their Marine Pollution Contingency Plan had been adhered to over the course of the two day exercise.

However, the evaluator found it difficult to make a fair and objective assessment of the performance of the operational EG during the early stages of the exercise due to the fact that the group's early business had been conducted over the telephone. It was therefore only when they set up in the Police HQ in Colwyn Bay (fully in place at 14:00) that it became possible to make an in depth assessment of performance.

Overview

There was effective cross border liaison with the North West England (NWE) EG and representatives from NWE were placed in the NW EG. The evaluator found it difficult to evidence the EG's performance against objective 3, although it was possible to determine from conversations and actions that "things" were happening. This uncertainty may have been due to the fact that a contractor had been appointed to handle the waste.

On the second day the general uncertainty of day one quickly evaporated and the EG settled into a good rhythm with members of the group being allocated tasks. Early discussions brought the EG up to speed and greater control was brought through improved admin processes and additional technical staff. The first EG meeting on day 2 had good buy-in through teleconferencing and there was much more obvious activity related to shoreline, at sea and airborne responses. The waste management cell was activated and responsive, TCG was engaged with the ELO linking well. EG attempted to phase its meetings around those of the other cells and work to a set agenda, they maintained a log of events, used whiteboards to capture key points and list questions. There was clear contact with other cells and requests were reviewed and responses provided. The EG actively sought information and other cells including the NW EG were involved in their meetings.

What went well

The liaison arrangements with North West England EG worked well with representatives present in both groups. Telephone contact was made with North West England (NWE) EG with clear input into meetings from the NWE representatives. The liaison between the cells (especially the TCG and waste cells based in Police HQ) was functional, practical and proportionate.

The initial alerting procedures for Natural Resources Wales worked well mainly via telephone contact and in due course all appropriate environmental organisations were informed. Environmental Liaison Officers were identified and in place early in the exercise. The NWE EG made a courtesy call to the Scottish Standing Environment Group (SEG).

The other response cells had been informed that the EG had been established during the early stages of the exercise.

Oil spill modelling was available initially through eni LBOC and then MCA representatives.

Sensitivity maps were available and an environmental impact assessment conducted and discussed amongst the group and disseminated wider. This assessment was an on-going process throughout the exercise. High priority protection areas were also identified and reviewed throughout the exercise as was the public health threat.

It was commented that the transfer of the chair on day two was effective. There was good delegation of responsibilities on day two which played to individual's strengths and the presence of DECC, MCA and eniUK representatives brought very useful expertise and knowledge to the group.

Requests for information on day 1 were limited and it was felt decisions were being made without proper EG consultation. Towards the end of day 1 the environmental liaison officers were asked to become more pro-active when dealing with other cells and to highlight areas where environmental consultation was needed and desired. There was a much improved communication flow with the cells on day 2.

Good use was made of face to face discussions, including setting up sub-groups, and conference call facilities on day two which helped ensure a good flow of information..

Less Effective

There was some uncertainty outside the EG around the issue of dispersant spraying and confusion caused by a third party apparently agreeing to the use of dispersant without EG input did not help nor did the fact that it was not clear, if a dispersant had been used, which of the two products available had been applied. Note: the EG had in place a standing approval process for dispersant use in internal waters that was not used.

Proposal 8: Consider updating existing, or producing guidance and training on roles and responsibilities of EG members	Assigned to: Incident and Emergency Team, Natural Resources Wales
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The application of technology, the use of white boards and formality around meetings (minutes and agendas) would have improved the functionality of the group. There was some contact with other cells but it was difficult to fully gauge the detail and significance, especially on day one, due to a log of events not being clearly available until day two.

It would have been very useful, especially during day 1, if a vice chair had been appointed to run the business when the chair was out of the room e.g. when attending the Head of Cells meeting. The importance of managing the cell was recognised although not always effectively implemented due to the calls on the chairs time.

EG response cell location was considered to be adequate but the electronic communications were intermittent and difficult to control/manage. Early attempts to conduct a teleconference on day 1 was hampered due to players not being able to take part due to technical issues with the telephone conferencing facility.

A predictable problem with IT security issues meant that email and Internet access was intermittent.

Proposal 9: Consider updating existing, or producing guidance to ensure familiarisation in utilisation of available equipment and aides.	Assigned to: Incident and Emergency Team, Natural Resources Wales
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It was noted that communications with the MRC appeared unclear on day 1. However, the presence of the MCA representative on day two greatly improved the situation

Sharing information within the group and the other cells through bespoke email boxes such as an online document share point would have been beneficial.

Proposal 10: Consider the use of bespoke on line accounts for Environment Groups to allow sharing of information between EGs.	Assigned to: EG Chairs
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Some liaison officers were not fully aware of their role within the Environment Group.

Recommendation 3: Inclusion of Liaison Officers' roles and responsibilities within the National Contingency Plan and consider developing a generic training package for external organisations.	Assigned to: MCA Head of CPS Branch
Proposal 4: Consider providing training on the roles and responsibilities of Liaison Officers	Assigned to: All stakeholder organisations

Summary

The Environment Group was effectively led by NRW with telling inputs particularly from DECC and eni LBOC on day 1 and from the other key organisations represented over both days. Initially communications with the other cells, liaison officers and EG members was intermittent on day 1 although this improved significantly on day 2. The fact that the chair was shared between NRW staff and there was a handover on the morning of day 2 was not an issue and indeed helped to bring business into focus on day 2 mainly because the chairs worked in a complimentary fashion.

North Wales Strategic and Tactical Co-ordinating Groups

Objectives

- To test the Local Authorities' ability to respond to a major multi-agency incident.
- To test inter agency liaison.
- To test protocols for waste management – hazardous waste disposal.
- To identify recovery issues.

The objectives were partially achieved.

A full assessment against the cross border regulation between cross border agencies objective was unable to be conducted. This was due to insufficient quantities of waste being generated during the clean-up activities on Day 2. Planning did not provide sufficient waste to overwhelm the disposal strategy put in place

Particular note to be given to the interagency operability and good working practice between the three impacted local authorities.

What went well

Day 1

Strategic Co-ordinating Group (SCG)

The group utilised a pre prepared SCG agenda and Strategic Strategy and Planning Assumptions that expedited the process allowing the meeting to quickly address key issues. The role and expectations were clearly set out by the group and the 'battle rhythm' established.

The SCG meeting was well chaired and as such objectives were defined quickly. It was agreed that the Tactical Co-ordination Group (TCG) would be called as soon as possible and that the local authority would chair this group. A number of issues were discussed during the first SCG including cost recovery, the need for a Strategic Recovery Coordinating Group (SRCG), media response and horizon scanning.. The move to the recovery phase of the incident was considered in line with the pre identified objectives set by the Joint North Wales Local Authorities.

During the second SCG amendments were made to the Strategic Strategy so as to keep in line with the progression of the incident. The media strategy for the incident was set with press statements being issued and two press conferences being held and whilst the media strategy was clear and well managed it was introduced late in the incident

Tactical Co-ordination Group (TCG)

A request was issued for the TCG to be called shortly after the first SCG meeting at which the local authority facilities manager attended. This ensured that all local authority ICT equipment was working quickly and significantly reduced any delays due to technical issues.

The operation of the TCG was quickly agreed and a strategy for the management of the incident during day two was implemented, consideration was given to the following:

- Waste disposal
- Resource identification and allocation
- Beaching sites
- Public access
- Public information

A clear strategy was set for managing the incident overnight and into the following day.

Day 2

Tactical Co-ordination Group (TCG)

The TCG split into management teams each concentrating on a specific aspect of the incident, these included:

- Recovery
- Waste Management
- Coastal Protection

The head of each of the above subgroups then met to set a strategy going forward. This technique worked well during the exercise as it allowed for focus to be given to specific aspects of the incident; as a result issues were not missed. Although three separate local authorities were impacted by the incident a chair was identified for each cell and as set out in the objectives the interagency liaison and working was effective and well managed.

There was good interaction with cross-border English partner agencies and communication was established on a regular basis.

During the second day the TCG gave consideration to a number of additional issues over and above those identified on Day 1.

Less effective

There was a significant quantity of visual data produced during the exercise at Northop; this information would have been invaluable when setting strategy in the SCG and TCG meetings. Unfortunately the information was not requested and as such was not utilised to its full potential. This could have been as a result of miscommunication between groups at the SCC and those in separate locations. In any incident of this kind in future a request for modelling data in the early stages would prove useful in managing the impact of the event.

Recommendation 3: Inclusion of Liaison Officers' roles and responsibilities within the National Contingency Plan and consider developing a generic training package for external organisations.	Assigned to: MCA Head of CPS Branch
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Proposal 4:	Assigned to:
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Exercise DRAGON Exercise Report



Consider providing training on the roles and responsibilities of Liaison Officers	All stakeholder organisations
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The exercise participants performed well with the exercise data they were provided. At times the exercise was wholly sustained by the controller's interaction and the creation of additional injects, information and direction. Exercise play was hindered on a number of occasions by the lack of generated data from exercise management. On the second day it was difficult to maintain the momentum of the exercise, which was coming to a natural close some time before the decision to formally end the exercise.

Cheshire - Tactical Co-ordinating Group

Objectives

- To test the communication links with the lead SCG and consider interface/ support that may be required.
- To test cross border response and recovery to a coastline pollution incident having regard to the environmental impact (clean-up).

All the objectives were met.



Overview

The establishment of a Tactical Co-ordination Group (TCG) in Cheshire provided a cross-border element to Exercise Dragon. The Cheshire TCG would contain representatives from the appropriate Category One responders from the Cheshire Resilience Forum.

Cheshire TCG would participate on Day 2 only. The initial decisions for the Cheshire TCG were therefore pre-determined by the local planning group. Notionally a multi-agency teleconference was held and it was agreed that the TCG would be established at Cheshire Police HQ chaired by a Senior Police Officer.

The Cheshire Resilience Forum TCG

The participants were provided with an initial briefing by the Exercise Controller using the 'overnight activities' statement. The Environment Group liaison officer also fed the NW England Environment Group SITREP from Day 1 into the group.

What went well

The chair of the group was effective in controlling the discussions around the table concerning how the group should move forward. There was good cooperation between the agencies and a clear understanding of the roles and responsibilities of the agencies involved.

It was decided that as the group's focus moved to the clean up of the estuary that the local authority should lead the group. At the final briefing chaired by the police commander the handover to the local authority was successfully discussed and agreed.

Less effective

It was accepted that the local authority would take over the chair of the group and lead into the recovery phase. However the time constraints on the operation of the TCG did not allow for briefings by the local authority as chair

The primary communications link to the NW England Environment Group was via the Environment Agency liaison officer within the TCG. This proved problematic due to the length of the TCG briefings coupled with the fact that these briefings were not synchronised with those at the Environment Group.

Proposal 11: Review communication protocols to ensure relevant information is being disseminated.	Assigned to: Cheshire LRF Co-ordinator
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The Local Authorities had expected to receive an initial alert via the North West England Environment Group, this did not happen.

Proposal 12: Consider a discussion and review of alerting procedures.	Assigned to: Cheshire LRF/North West Environment Group
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Summary

Exercise Dragon provided an excellent opportunity for Cheshire Resilience Forum (CRF) to test their response to a coastal pollution incident. It provided an opportunity for responders to test their own plans against the scenario and for the CRF to consider any planning deficiencies in this area.

Shoreline Deployment - Conwy Harbour

An objective set by eni Liverpool Bay Operating Company (LBOC) was to “test the interface between Braemar Howells (BH) and Oil Spill Response Limited (OSRL) and subsequent interaction with local authorities and agencies”. As detailed in the eni LBOC Oil Pollution Emergency Plan BH would be expected to arrive on scene first being the tier 2 response providers and based in proximity to the site. Following arrival, if/when the incident escalated to tier 2, OSRL would take lead in dealing with the response.. The shoreline deployment of counter pollution response equipment was conducted in parallel but was not part of the actual exercise. Due to potential weather conflicts and to avoid confusion at the tabletop exercise this aspect of the exercise was a demonstration.



Over flight of Dornier



OSRL stockpile on display



BH shoreline deployment



OSRL Shoreline equipment

As per the contracted agreement with eni LBOC, BH set up and deployed a full shoreline demonstration as per the contingency plan for Conwy. OSRL then set up at the site and provided various skimmers, temporary storage, decontamination, communications, SCAT and wildlife response equipment, as if the incident had escalated to tier 3 This demonstration area acted as part of a ‘show and tell’ for all observers. OSRL also conducted an over flight of the area and downloaded flight data to the command centre on the beach. This demonstrated OSRL’s UKCS capabilities.

Observation – during the planning stage for the exercise it was established that the shoreline response plan for the local areas was insufficient and out of date.

As such, eni LBOC recognised the need to review and update the plan.

Annex A: Media evaluation conducted by Steelhenge

1. Introduction

The Maritime and Coastguard Agency (MCA) conducted a National Contingency Plan exercise, Exercise Dragon, on 10th and 11th September 2014. As part of the media response arrangements, press offices from the following organisations participated:

- Denbighshire County Council
- Department of Energy & Climate Change (DECC)
- eniUK
- Flintshire County Council
- Maritime & Coastguard Agency
- North Wales Police
- Natural Resources Wales
- Oil & Gas UK

This report outlines Steelhenge Consulting's involvement in the exercise and the observations that were made concerning how the press offices responded to both traditional and social media inputs.

The observations are based on telephone calls, emails and social media exchanges during the exercise. Steelhenge had no further visibility of the teams and their response. Therefore, benefit may be gained by obtaining feedback from those observing the teams at Colwyn Bay, to determine whether any additional, key learning's were identified that are not recorded in this report.

2. Steelhenge involvement

On 10th September, Steelhenge provided five staff to simulate the media interest generated by the exercise scenario. This consisted of:

- Four experienced staff members simulating journalists and making media enquiries to the press offices, conducting radio interviews and writing media articles
- One person to manage the Steelhenge Media Hub, which houses simulated versions of social media platforms and replications of online news websites

3. What went well

3.1 Good level of coordination

The press officers based in the media response cell in Colwyn Bay appeared coordinated in their messaging and the timing of when information was released. This appears to be a recommendation from a previous exercise, Sula, and seemed to work well.

3.2 Good provision of information

The statements released by the media cell at Colwyn Bay were considered to be factual and informative, although they could have been released sooner.

During the afternoon stage of the exercise, eniUK was substantially more forthcoming with the information they were willing to provide through their exercise 'dark site'. This provided the role-playing journalists with a good source of constant information and

helped to fill the void. However, as noted below, work is required to begin this process sooner.

The social media sites were proactively used to share information regarding the incident.

3.3 Conduct

The overall media response improved as the exercise continued into the afternoon.

The role-playing journalists noted that, for the most part, the press officers remained pleasant, disciplined and robust throughout.

Particularly positive emphasis was placed on the MCA's response in the morning and Natural Resources Wales who were effective and informative throughout. The participating local authorities were also felt to be engaged and forthcoming with information in the afternoon.

4. Less effective

4.1 Inconsistent approaches

Whilst the media response at Colwyn Bay was generally well coordinated, there was a clear disconnect between the timing of their messaging and that of eniUK's, which was released later. It is advised that in future more emphasis is placed on trying to coordinate the company and governmental response.

It was also felt that there was a general inconsistency between the approach used to respond to social media and the traditional press by many of the organisations involved. Towards the start of the exercise, substantially more information was being shared via Twitter and Facebook than was being shared with the role-playing journalists. It is recommended that, at the start of an incident, an overarching media strategy is developed incorporating all forms of media to ensure there is a consistent response across all platforms.

4.2 Lack of information

At the start of the exercise, there was a reluctance to share information with the role-playing journalists. Whilst understandable as little information was known about the incident at that stage, the press offices could have shared other information in order to fill the void, such as the work being conducted in Liverpool Bay, past safety records and success stories, the actions being carried out at the scene to manage the incident, explanations of the general processes that take place during an incident of this nature etc.

In the event that the scenario were to occur in reality and the company refused to provide any information, the press might locate other sources more willing to communicate, such as disgruntled former employees, the local public, activists, competitors etc. Early engagement can provide the opportunity to influence the story.

Recommendation 12: Q&A information packs, containing background and factual information that can be shared with the media (including images, maps, local information etc.), to be developed.	Assigned to: MCA Head of Communications
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4.3 Lack of engagement

During the exercise, a number of requests for radio interviews were made by the role-playing journalists, however only the MCA accepted. It was considered that by not identifying a spokesperson for the incident, an impression of a lack of control, unclear leadership for the management of the incident and avoidance of responsibility was given by those organisations involved.

Furthermore, exercises provide an excellent opportunity for potential spokespeople to rehearse their interview skills in a safe environment.

There were a number of instances where press officers failed to return phone calls. This was particularly evident for Oil & Gas UK and North Wales Police. Effort should be made by media response teams to ensure all incoming media enquiries are logged and, where necessary phone calls are returned.

5. Conclusions

In conclusion, the media response during the exercise went well.

At the start of the exercise, press teams were reluctant to provide any information and, at times, the social media teams were more forthcoming than those responding to media enquiries from journalists. However, the efficiency and effectiveness of the teams greatly improved as the exercise progressed into the afternoon.

The teams involved in the exercise did not seem to consider the potential issues or questions that may arise as a result of the incident. Had this assessment process taken place, the appropriate messaging and lines to take could have been developed sooner.

The coordination of the media response was generally consistent; however focus should be placed on how to better coordinate the corporate and government response.

Recommendation 13: During future training and exercising, specific attention should be placed on how to improve the media response in the early stages of an incident, in an attempt to gain control of the situation.	Assigned to: MCA Head of Communications
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Annex B: Summary of Recommendations

These recommendations should be read in conjunction with the overall report and not in isolation.

			<i>To be completed by the recommendations monitoring group</i>	
No.	Lesson Identified	Recommendation	Suggested Owner*	Target Date
1	MCA Counter Pollution Branch was not represented on the planning team due to resource constraints. This meant there was no direct input from the branch which may have impacted the development of the scenario.	All cells participating in future National Contingency Plan Exercises are to be represented on the planning team.	All participating organisations and authorities	
2	Distribution of the final exercise documentation was delayed due to late submission of information required from participating organisations. This caused additional pressures for the planning team on the day prior to the exercise.	All exercise documentation is to be completed, issued and distributed accordingly one week prior to commencement of the exercise.	Exercise Director	
3	It was observed that in general, Liaison Officers were unfamiliar with their specific role and responsibilities.	Inclusion of Liaison Officers' roles and responsibilities within the National Contingency Plan.	MCA Head of CPS Branch	
4	The Douglas OSI Offshore Installation Manager (OIM) expressed concern regarding the length of the initial phone call with the DECC inspector having previously advised the CP Branch.	Efficient method(s) of collecting incident data from the OIM and dissemination between regulators to be explored.	MCA Head of CPS Branch in consultation with DECC Inspectorate Team Leader	

Exercise DRAGON Exercise Report

5	Initial provision of information by eni LBOC to the OCU was insufficient and lacked detail.	Identify and list information required by the SOSREP in the OCU from Operators during incident response on the O&G UK Website	Deputy to the SOSREP	
6	eni LBOC internet connectivity was tested as part of the planning process once it was fully loaded during the exercise internet connectivity was found to be intermittent.	OCU facility requirement to be reviewed and updated in the OPEP Guidance	DECC Offshore Inspectorate Team Leader	
7	Use of dispersant spraying was very quickly suggested but necessary approvals were not obtained from DECC before spraying commenced.	National Contingency Plan to be reviewed to ensure the protocol for dispersant spraying approval on pollution from offshore infrastructure is clear and unambiguous	MCA CPS Head of Branch / DECC Environmental Management Team Leader	
8	MRC briefings took place and kept the same structured approach from the Head of Cell. However, in some, it was noted some members were answering their phones which disrupted the flow of the briefing. There was a lack of relevant information, electronically or paper based, displayed to be of use to the members of the cell. ICT was a serious issue throughout the exercise for the MRC as a consequence of the location.	Consider reviewing, or developing, general etiquette and protocols for members conduct during team briefings. Conduct a review of working practices with regard to information management and the use of paper and electronic materials. Consider developing a procedure for MCA ICT staff members to be deployed at the onset of a major incident when an MRC is established.	MCA Head of CPS Branch	
9	There appeared to be no set structure for information exchange between the MRC and other response cells.	Ensure that appropriate processes are in place to facilitate the exchange of information between response cells.	MCA Head of CPS Branch	
10	A full assessment against the cross border regulation between cross border agencies was unable to be performed due to the	Generic Table-Top exercise to be developed to test procedures for cross-border transportation of waste.	MCA CPS Branch Scientific Lead	

Exercise DRAGON Exercise Report

	response strategy undertaken of appointing a contractor.			
11	Both EGs were considering similar aspects of the response liaising through the ELO or direct between partner organisations within the EGs at the same time and this resulted in a duplication of work.	National Contingency Plan to describe a process which will facilitate the working relationship between multiple EG's.	MCA CPS Branch Scientific Lead	
12	Lack of provision of information to the media at an early stage of an incident could lead to fabricated/inaccurate media reporting.	Q&A information packs, containing background and factual information which can be shared with the media (including images, maps, local information etc.), to be developed.	MCA Head of Communications	
13	The coordination of the media response was generally consistent; however focus should be placed on how to better coordinate the corporate and government response.	During future training and exercising, specific attention should be placed on how to improve the media response in the early stages of an incident, in an attempt to gain control of the situation.	MCA Head of Communications	

** A recommendation and proposal-monitoring group is to be established to oversee the outcome of the recommendations listed above. Once the recommendations have been assigned to specific groups / individuals, and confirmed, and target dates have been established, this section of the report will be updated.*

Annex C: Proposals and Best Practice

During the exercise the evaluation team and exercise participants made a number of observations that have been translated into proposals. These proposals have a suggested owner, as agreed by the organisations participating in the exercise. Organisations that did not participate in the exercise are encouraged to review these proposals and consider if they are applicable to their own response teams.

	Proposals and Best Practice	Suggested Owner
1	Consider additional personnel resource requirements to efficiently respond to an incident of national significance.	eni LBOC HSE Manager
2	Members of the IMT should consider enhancing their familiarity with all contingency plans associated with an eniUK incident response.	eni LBOC HSE Manager
3	Consider developing an Intercell communications protocol to ensure important information is shared.	eni LBOC HSE Manager
4	Consider providing training on the roles and responsibilities of Liaison Officers.	All stakeholder organisations
5	Consider reviewing emergency response procedures.	eni LBOC HSE Manager
6	Consider developing a consistent and efficient streamlined review process for media/press statement releases.	eniUK Media Team
7	Consider delegation of incident reporting to regulating authorities from the OIM to an assigned deputy or communications officer.	Oil and Gas Industry
8	Consider updating existing, or producing guidance and training on roles and responsibilities of EG members.	Incident and Emergency Team, Natural Resources Wales
9	Consider updating existing, or producing guidance to ensure familiarisation in utilisation of available equipment and aides.	Incident and Emergency Team, Natural Resources Wales
10	Consider the use of bespoke on line accounts for Environment Groups.	Incident and Emergency Team, Natural Resources Wales
11	Review communication protocols to ensure relevant information is being disseminated.	Cheshire LRF
12	Consider a discussion and review of alerting procedures.	Cheshire LRF/North West Environment Group