NW ENGLAND
STANDING ENVIRONMENT GROUP

OPERATIONAL GUIDANCE FOR COASTAL & MARINE POLLUTION INCIDENTS

ANNEX TO

NW ENGLAND
COASTAL POLLUTION EMERGENCY PLANS

Guidance Issued: November 2015

DISTRIBUTION LIST

This Operational Guidance and amended Operational Guidance will be issued electronically. A single copy will be sent to the SEG representative from each of the organisations listed below. The representative is responsible for distributing further copies within the organisations which they represent, as needed.

Natural England

Environment Agency

Inshore Fisheries Conservation Authority

Mariine Management Organisation

Public Health England (PHE)

Maritime and Coastguard Agency

Cumbria County Council

Lancashire County Council

Sefton Council (lead on overarching Merseyside plan for Liverpool, Wirral and Sefton)

Greater Manchester LRF (Manchester Ship Canal)

Cheshire West and Chester Council

Wirral MBC

Liverpool City Council

Depratment of Communities and Local Government (DCLG)

A single copy will also be sent to the organisations chairing the adjacent Environment Groups:

North Wales SEG
Dumfries & Galloway Environment Support Group/Whole of Scotland SEG

The contents of this document are not for general release to the press or public

RECORD OF AMENDMENTS

Amendment number	Date amended Guidance re-issued	Amendments made to the Guidance
1	January 2010	Operational Guidance reviewed and reissued following minor amendments to Section 1.3 & 2.1, Appendix 1, 6 & 9.
2	January 2010	Appendix 3 SEG Core Members Emergency Contact Details updated and re issued
3	January 2010	Appendix 6 Lancashire SRC Location updated and re issued
4	May 2015	Reviewed following NCP revision and NWE EG activation
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ABBREVIATIONS LIST

ACOPS	Advisory Committee on Pollution of the Sea
AONB	Area of Outstanding Natural Beauty
ASSI	Area of Special Scientific Interest (Northern Ireland)
BOD	Biological Oxygen Demand
BTO	British Trust for Ornithology
CaMRA	Coastal and Marine Resource Atlas
CAST	Coastguard Agreement on Salvage and Towage
CCA	Civil Contingencies Act
CCW	Countryside Council for Wales
CEFAS	Centre for Environment, Fisheries and Aquaculture Science
CGOC	Coastguard Operations Centre
CHAG	Chemical Hazards Advisory Group
CIRS	Chemical Incident Response Service
COSHH	Control of substances hazardous to health
CPSO	Counter Pollution & Salvage Officer (MCA)
CRCE	Centre for Radiation, Chemical and Environmental Hazards (PHE)
DARD	Department of Agriculture & Rural Affairs (Northern Ireland)
DECC	Department of Energy and Climate Change
DEFRA	Department of Environment, Fisheries and Rural Affairs
DfT	Department for Transport
DOE	Department of the Environment (for Northern Ireland)
EA	Environment Agency
EG	Environment Group
EHS	Environment & Heritage Service (Northern Ireland)
EIA	Environmental Impact Assessment
ELO	Environmental Liaison Officer
EMSA	European Maritime Safety Agency
ESGOSS	Ecological Steering Group on the Oil Spill in Shetland
ETV	Emergency Towing Vessel
FC	Fund convention
FEPA	Food and Environment Protection Act 1990
FSA	Food Standards Agency
GCR	Geological Conservation Review
GESAMP	Group of Experts on the Scientific Aspects of Marine Pollution
GIS	Geographical Information System
GRT	Gross Registered Tonnage
GT	Gross Tonnage
HMCG	Her Majesty's Coastguard
HPS	Health Protection Scotland
HSE	Health and Safety Executive
IFCA	Inshore Fisheries Conservation Authority
IFG	Inshore Fisheries Groups (Scotland)
IMDG Code	International Maritime Dangerous Goods Code
IMO	International Maritime Organisation

IOPC Fund	International Oil Pollution Compensation Fund
IP	Institute of Petroleum
ITOPF	International Tanker Owners Pollution Federation
JNCC	Joint Nature Conservation Committee
LNR	Local Nature Reserve
LRF	Local Resilience Forum
LWT	Local Wildlife Trust
MAGIC	Multi-Agency Geographic Information for the Countryside
MAIB	Marine Accident Investigation Branch
MARPOL	International Convention for the prevention of Pollution from Ships
MCA	Maritime and Coastguard Agency
MEIR	Marine Emergencies Information Room
MEPC	Marine Environment Protection Committee
MLMS	Marine Laboratory Marine Scotland
MMO	Marine Management Organisation
MNR	Marine Nature Reserve
MOU	Memorandum of Understanding
MRC	Marine Response Centre
MRCC	Maritime Rescue Co-ordination Centre
MS	Marine Scotland
MSA	Marine Safety Agency
MSDS	Material Safety Data Sheet
MSS	Marine Scotland Science
NCEC	National Chemical Emergency Centre
NCP	National Contingency Plan
NE	Natural England
NEBA	Net Environmental Benefit Analysis
NGO	Non-governmental Organisation
NIEA	Northern Ireland Environment Agency
NNR	National Nature Reserve
NPHS	National Public Health Service (Wales)
NRW	Natural Resources Wales
NT	National Trust
NTS	National Trust for Scotland
NWESEG	North West England Standing Environment Group
OCU	Offshore Control Unit
OPA90	US Oil Pollution Act of 1990
OPRC	Oil Pollution Preparedness Response and Co-operation Convention 1990
OSIS	Oil Spill Information System
OSPRAG	The Oil Spill Prevention and Response Advisory Group
P&I	Protection and Indemnity ‘Clubs’
PHE	Public Health England
POLREP	Pollution Report (MCA)
RCG	Recovery Coordinating Group (Shore response – long haul)
ResCG	Response Co-ordinating Group (Shore response cross borders)
RIGS	Regionally Important Geological Site

RRF	Regional Resilience Forum
RSPB	Royal Society for the Protection of Birds
RSPCA	Royal Society for the Prevention of Cruelty to Animals
SAC	Special Area of Conservation (EU Habitats Directive)
SAM	Scheduled Ancient Monument
SAR	Search and Rescue
SBM	Single Buoy Mooring
SCAT	Shoreline Cleanup Assessment Team/Technique
SCG	Strategic Coordinating Group (Shore response – Strategic)
SCU	Salvage Control Unit
SE	Scottish Executive
SEEEC	Sea Empress Environmental Evaluation Committee
SEG	Standing Environment Group
SEPA	Scottish Environmental Protection Agency
SFI	Sea Fisheries Inspectorate
SG	Scottish Government
SITREP	Situation Report
SLAR	Sideways Looking Airborne Radar
SMRU	Sea Mammal Research Unit
SNH	Scottish Natural Heritage
SOLAS	International Convention for the Safety of Life at Sea
SOSREP	Secretary of State's Representative for Maritime Salvage and Intervention
SPA	Special Protection Area (EU Birds Directive)
SRC	Shoreline Response Centre
SSPCA	Scottish Society for the Prevention of Cruelty to Animals
SSSI	Site of Special Scientific Interest
STAC	Scientific and Technical Advice Cell
STOp	Scientific, Technical and Operational Guidance Notes
TCG	Tactical Co-ordinating Group (Shore response – Tactical)
TEZ	Temporary Exclusion Zone
UKOOA	United Kingdom Offshore Operators Association
UKPIA	United Kingdom Petroleum Industry Association
UNCLOS	United Nations Convention on the Law of the Sea
USPCA	Ulster Society for the Prevention of Cruelty to Animals
VTS	Vessel Traffic System
WG	Welsh Government
WWF	World Wide Fund for Nature

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1. INTRODUCTION

1.1. The Environment Group (EG) is established in response to coastal and marine pollution incidents, particularly where there may be a threat from oil or other hazardous substances. Ithas a vital role to play in advising on the incident response and minimising environmental harm.

1.2. This Operational Guidance details the contingency arrangements put in place by the NW England Standing Environment Group (NWESEG) for the establishment and operation of an EG to respond to actual or threatened pollution incidents along the NW England coastline.

1.3. The Operational Guidance has been prepared by the NWESEG to complement the Maritime & Coastguard Agency (MCA) National Contingency Plan for Marine Pollution from Shipping and Offshore Installations (NCP) and as an Annex to the Coastal Emergency Pollution Plans in place on the NW England coast.

1.4. The Operational Guidance has been developed taking into account the possible sources of pollution associated with port operations, shipping and any facility with the potential to cause major pollution

1.5. The role of theNWE SEG is to develop and maintain Operational Guidance which sets out the measures that will be taken on the NW England coast to minimise the impact of a coastal or marine pollution incident on the **public health** and the **natural environment**. This type of incident will fall under the scope of an "emergency" under the nCivil Contingencies Act Part 1. It is most likely going to be a Tier 2 incident or Tier 3, as defined by the incident resonse matrix within the National Contingency Plan (Section 9 – Incident Response Matrix).

1.6. The remit of the SEG/EG and this Operational Guidance is public health and the natural environment (water quality,air, wildlife including commercial fish, landscape) including socio-economic factors linked to human health eg through food chains.

1.7. The nature of the EG response will be directly proportional to the nature of the incident and the threat posed to public health and the natural environment.

1.8. The Operational Guidance will be reviewed after every occasion it is activated whether for multi-agency maritime exercises or in the light of lessons learnt through incidents, and at least biennially. It will also take account of changes in legislation or national guidance.

2. SEG OPERATIONAL AREA

2.1. The Operational Area of the Guidance is the estuarine, coastal and marine environment of NW England from the Scottish border in the Solway to the Welsh border in the Dee Estuary (Appendix 1) out to the 12 nautical mile territorial limit.

By agreement with the North Wales SEG, the North Wales SEG will lead on the Dee Estuary (from West Kirby) initially, until review by adjoing boundary chairs to determine and confirm joint response arrangments for the incident following activation.

By agreement with the Scottish SEG the lead SEG for the Solway Estuary will be taken on by the Environment Group with the worst affected coastline.

The SEG should have the competency and resources to be able to provide advice on the effects of any pollutant on all of the ecosystems and amenities that are found on the NW England coast.

3. STANDING & INCIDENT EG MEMBERS

3.1. Core members of the SEG and the EG established in incidents are:

- Environment Agency
- Natural England
- Inshore Fisheries Conservation Agency
- Marine Management Organsiation
- Maritime and Coastguard Agency
- Public Health England

3.2. To ensure that appropriate linkages with local authorities and Resilience Fora are made in developing and maintaining this Operational Guidance, members of the SEG also include the lead local authority Emergency Planning Officer for each LRF

- Cumbria
- Lancashire
- Merseyside (Sefton lead on overarching plan covering Liverpool, Wirral and Sefton)
- Manchester (Manchester Ship Canal)
- Cheshire
- Department of Communities and Local Government

3.3. The members of an EG will include the core members of the SEG and may be extended as appropriate to include other environmental and public health interests and expertise as required eg:

- RSPB
- RSPCA
- Wildlife Trusts
- Others as identified during incident response

4. ACTIVATING AN EG RESPONSE

4.1. The MCA will initiate the activation of the NCP. However, the Coastal Pollution Emergency Plans in place on the NW England coast make provision for the activation of those plans separately or prior to, the activation of the NCP, dependent on the size or scale of the pollution threat or incident.

4.2. The organisation chairing the NWE SEG shall, on notification of activation of one or more of the Coastal Pollution Emergency Plans on the NW England coast or the NCP or on receipt of the first pollution report (POLREP) from the MCA, review information and

decide if a conference telephone call with the other SEG core members is needed to discuss the incident and response, including whether and where an EG will be set up (***see EG RESPONSE ACTIVATION CHECKLIST at Appendix 2***).

4.3. The SEG core members will make an assessment of whether the scale of the incident and the counter pollution measures requires a regional, sub-regional or local focus. This assessment will include the environmental risks and potential impacts arising from an incident, as well as the implications of any marine and shoreline clean up or salvage operations. These will include both natural environment and public health issues that are likely to arise.

4.4. If an EG is required an EG Chair and Deputy Chair will be agreed following discussion between the MCA and SEG chair, taking account of the nature of the incident which is likely to influence the choice of the Chair. The core SEG/EG members will be contacted by their 24 hour emergency contact numbers (Appendix 3).
TheEG will be located as agreed between the MCA and the EG Chair i.e. EA premises or co located with Strategifc Coordination Centre (SCG) following discussion with the MCA. A single spill incident can readily impact across both local authority and Environment Group boundaries. In the event of a spill impacting 2 or more EG areas the Group Chairs should consider either merging the Groups or at very least maintaining close liaison with respect to a developing and/or changing scenario requiring coordination of response and advice provision.

4.5. Local Authorities' maintain Emergency Contact Directories which should be available and used for consistency and ease of reference. Core SEG members will ensure they hold a current version of these Emergency Contact Directories.

4.6. Where the pollution incident has the potential to impact upon the adjacent coastline in Wales or Scotland, and the alert has not come from the North Wales or Scotland SEG chairs, the organisation chairing the NW England SEG will contact the organisation chairing the relevant SEG. Contact will be through their 24/7 national emergency contact number and SEG co-ordination arrangements will be agreed, including whether a joint Environment Group should be convened.

5. EG ROLES & RESPONSIBILITIES

5.1. The main functions of the EG are to:

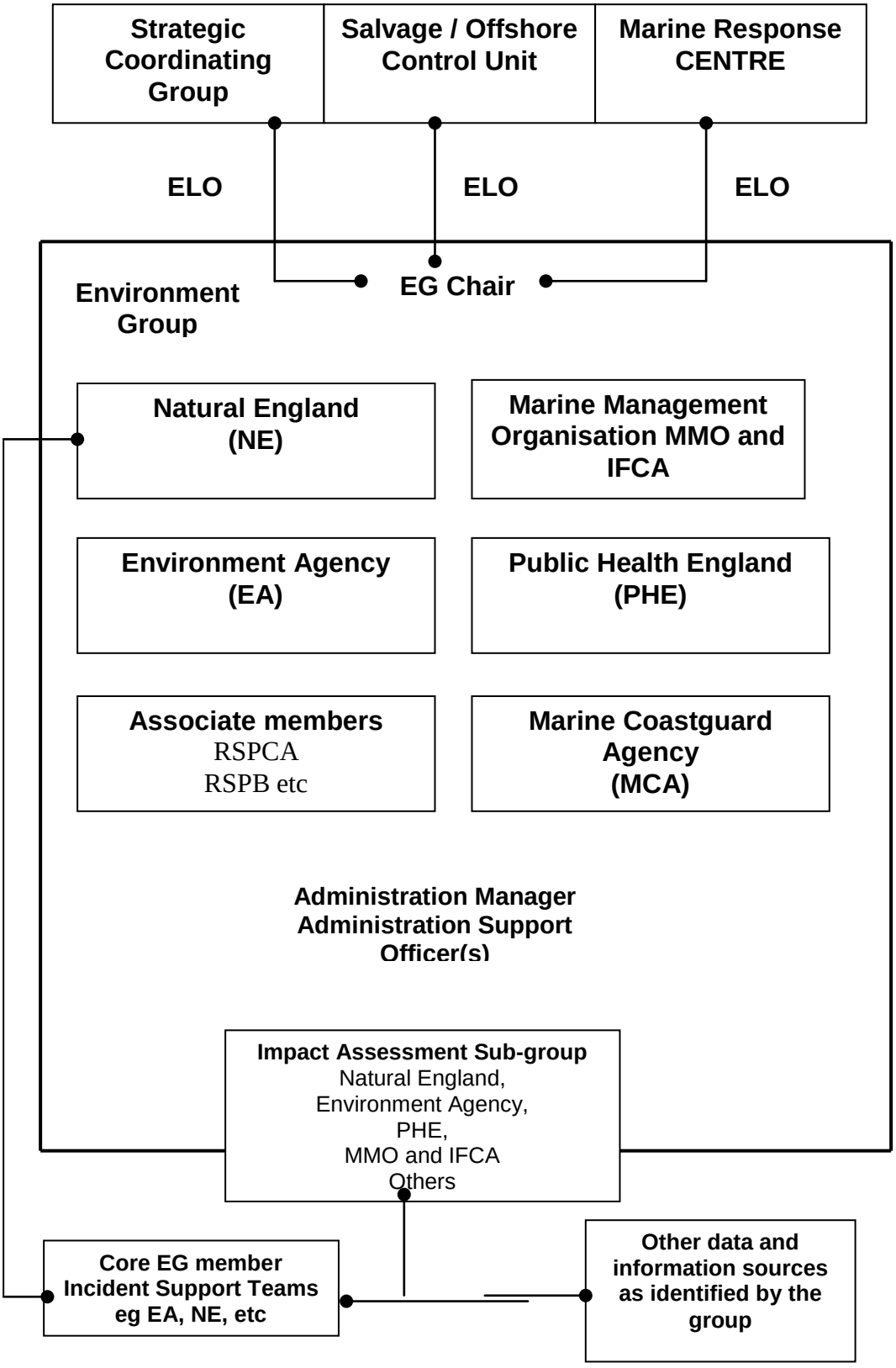
- ensure the provision of focused, prioritised advice to the response centres (SCU, SCG, MRC) that may be established, and maintain of the flow of information between the EG and these centres, on all aspects of public health and environmental resources at risk, within the required time frame. in Tier 1 incidents (where response centres are not set up) core members of the SEG ensure the provision of advice and information to the MCA, Port Authority or Local Authority dealing with the pollution on all aspects of public health and environmental resources at risk, via the Chair.
- ensure the prompt initiation and effective coordination of any impact assessment deemed to be appropriate.

5.2. Following notification of an incident. **The Chair will**:

- be responsible for the management and co-ordination of the EG (see Appendix 9).

- appoint **Environmental Liaison Officers** (ELOs) to each of the response units established to deal with the incident eg SCU, SCG / TCG and/or MRC (see Appendix 9).
- appoint an **Administrative Manager/Support Officer(s)** to the EG (see Appendix 9):
- if necessary, appoint an **Environmental Impact Assessment Coordinator** to the EG (Appendix 9)
- if necessary, appoint an **Information Manager** to the EG (Appendix 9)

Figure 1 Environment Group structure



6. KEY TASKS

6.1. The EG may need to undertake work and provide advice on the following areas. The list is not exhaustive and will need to reflect the priorities and particular circumstances of the incident; some areas may not be relevant for specific incidents.

6.2. Generic tasks:

- To assist in the prioritisation of areas requiring clean-up.
- The location of temporary beach head storage sites and medium term inland storage sites, if available.
- Advice on disposal options
- The location of recovery and disposal sites.
- The sustainability of clean up and disposal measures.
- Advice on the suitability of booming locations in respect of the protection of sensitive sites and habitats.
- Advice on the suitability of dispersants and degreasants, with consideration of the polluting effects of the clean up chemicals as well as any synergistic effects when mixed with the pollutant.
- Considerations of the “do nothing” approach, with an assessment of the feasibility of natural dilute and disperse principals.
- To provide environmental fate and toxicological modelling information where possible.
- Monitoring of the effect and efficacy of the clean up operation, providing real time information to direct the clean up operation based on the evaluation of incoming information and data.
- Initiating long-term impact assessment of impacts on public health and the natural environment, including fisheries (including shellfish beds, farms etc)

6.3. Provision of public health advice

- Advice on public health issues to include exposure limits for the general public as well as for a health and safety risk assessment for clean up teams.
- Impact assessments on the human food chain, for example shellfisheries.

6.4. Provision of natural environment advice:

- Advice on sensitive species and habitats and the vulnerability of “at risk” receptors.
- Provision of baseline data on the species and ecological characteristics of the various habitats around the NW England coastline, giving consideration to the toxicology and environmental fate of the pollutant within the framework provided by the baseline data.
- An assessment on the potential impact on statutory environmental standards, such as those included in the Habitats Directive and the European Directive on Bathing Water Quality.

- Baseline monitoring of impacts on wildlife, fisheries and sensitive sites/habitats threatened by the pollution incident or response measures

Important Note:

Where both the EG and STAC are established for an incident, they will liaise closely and may on occasions merge fully. This decision will be made by the chairs of the EG and the STAC in consultation with the SCG chair and the MCA. The decision will be influenced by whether the incident main threat is to the environment or public health.

7. COMMUNICATIONS

7.1. The EG Chair will appoint an Administrative Support Officer whose role will be to maintain a log of all communications. Establishing a log of events must be one of the first priorities of the group (Appendix 10).

7.2. The Environment Liaison Officers (ELOs) appointed by the EG Chair will identify themselves to the SOSREP, SCU, SCG or MRC and establish communications with EG.

7.3. All direct communication with the media must be co-ordinated through the SCG via the ELO, or via the MCA structure for SOSREP, SCU or MRC.

7.4. Each member organisation should establish communication with their respective organisations command centres. Direction of field staff involved in reconnaissance and monitoring will be made through the respective agency's command structures.

7.5. Communications with Clean-up teams **must not be** made directly by the EG. These teams are co-ordinated through the SCG

7.6. The representative of each of the member agencies to the EG must have sufficient breadth and depth of knowledge of their respective organisations roles and responsibilities to enable the EG to fulfil its remit.

8. RECORD KEEPING

8.1. Each core agency must record their individual actions in the incident log. An example of a log is provided in Appendix 10.

8.2. Records of all communications must be kept. The communications could be in the form of:

- Minutes of EG meetings
- Fax
- Telephone conversations
- E mails
- Press releases

8.3. The records should be in chronological order to provide a timeline of the incident. It will be the responsibility of the chair through the administration assistant to ensure a continuous record is made.

8.4. The record of the following should be kept:

- Time of notification of the incident by the MCA

- Time of formation of the EG /those present and venue
- Information supplied to the ELOs
- Press releases
- Provision of information to third parties
- Any costs incurred
- Resources deployed
- Health and safety issues
- Key decisions
- Key events
- Names of staff deployed
- Periodic tide and weather updates
- Time of incident closedown and factors appraised

8.5. All printed documents such as press releases and SITREPs must be retained and placed on the Incident File.

8.6. ELOs should keep a separate running log of their actions.

8.7. The incident file will be compiled by the Chair within one month of the closure of the incident.

8.8. The file should make reference to the following post incident requirements:

- Recovery times
- Waste management.
- Resources deployed to any post incident enquiry.
- Liaison with insurance assessors
- Liaison with salvage assessors.

8.9. All documents created within the SCU, SCG or MRC or by the ELOs during the incident must be retained and not destroyed. The Chair will arrange for the retention of the records and will liaise with his Head of Legal Service regarding the period of their retention.

9. STAND DOWN PROCEDURES

9.1. It is the responsibility of the Chair to stand the group down when the SCU, SCG and MRC indicate formally that they have closed at the end of the incident.

9.2. The stand down time and reasons for stand down will be entered in the incident log.

9.3. The Chair will inform all interested parties that the EG has stood down. A press release may be considered.

9.4. The Chair will collate and preserve all records relating to the incident after the incident.

9.5. Debrief details and lessons learnt will be provided to all participating agencies by the within two weeks of the debrief.

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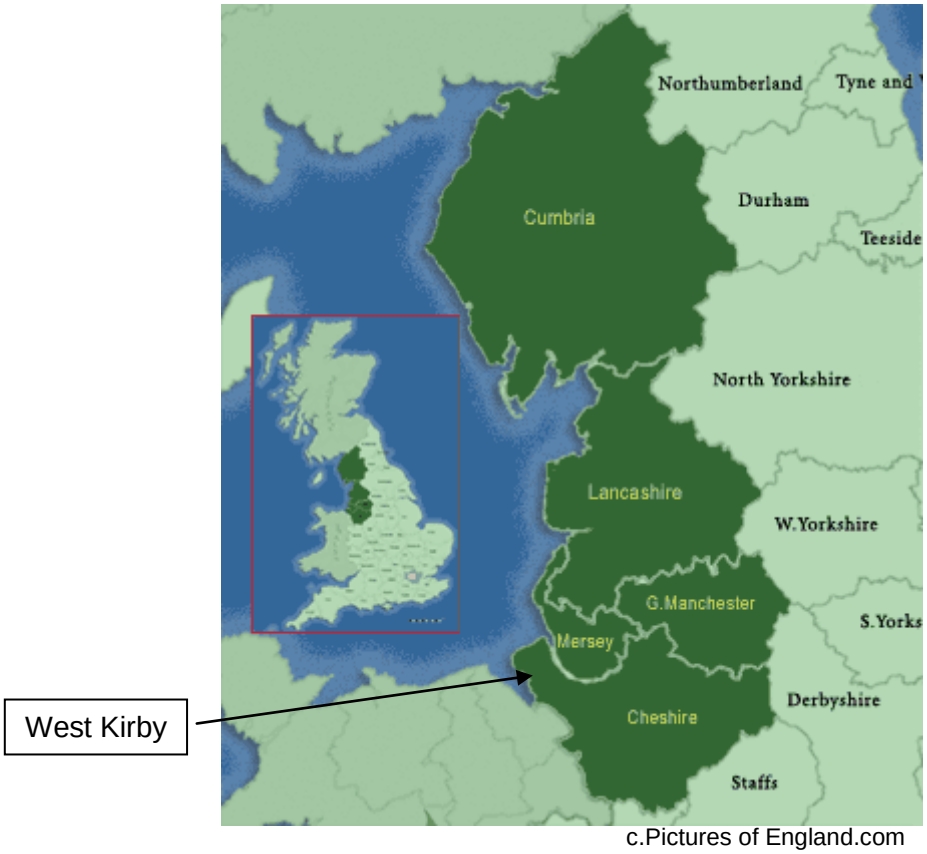
APPENDIX 1
NW ENGLAND SEG OPERATIONAL AREA

The Operational Area of the Guidance is the estuarine, coastal and marine environment of NW England or navigable waterways from esturine which could impact the marine environement e.g. Manchester Ship Canal

Northern boundary: England/Scotland boundary in Solway Firth; the Dumfries & Galloway Major Emergency Scheme Environment Support Group and the Whole of Scotland SEG cover the Scottish side By agreement with the Scottish SEG the lead SEG for the Solway Estuary will be taken on by the Environment Group with the worst affected coastline.

Southern Boundary: England/Wales boundary in Dee Estuary; the North Wales SEG covers the Welsh side. By agreement with the North Wales SEG, the North Wales SEG will lead on the Dee Estuary (from West Kirby) unless and until other arrangements are agreed between the chairs of adjoining groups either at the onset or during the incident response..



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APPENDIX 2
EG RESPONSE ACTIVATION CHECKLIST

Incident:	Date:

On receipt of confirmed maritime pollution incident where EG advice is required, the Standing EG Chair or the incident EG Chair if & once appointed should take the following actions:		
ACTION		**Date/time completed**
1	Establish & keep log – ***see LOG (Appendix 10)***	
2	Obtain comprehensive briefing from MCA – ***see ESSENTIAL ALERT INFORMATION CHECKLIST (Appendix 4)***	
3	Determine scale of incident – does EG need to be convened? **YES – go to A** **NO – go to B**	
A	**INCIDENT REQUIRES EG TO BE CONVENED**	
A1	Establish contact with core EG members • Brief/receive briefing - ***see ESSENTIAL ALERT INFORMATION CHECKLIST (Appendix 4)*** • Agree initial advice to MCA/response units • Agree EG Chair & Deputy Chair & confirm transfer of responsibility • Agree nominations for ELOs • Agree associate EG members to be invited • Agree location of EG • Agree time to convene	
A2	Alert, brief and mobilise ELOs to following: • Salvage Control Unit • Marine Response Centre • Strategic Coordination Centre	
A3	Provide initial advice to MCA/response units	
A4	Ensure alert of all relevant bodies and individuals is initiated – ***see NOTIFICATION CHECKLIST (Appendix 5)***	
A5	Mobilise basic admin support	
A6	Relocate to EG location at agreed time	
A7	Obtain updated briefing from MCA or other key sources of information	
A8	Establish & maintain direct communications with ELOs	
A9	EG Chair to convene meeting of EG – ***see GENERIC FIRST MEETING AGENDA (Appendix 7)***	
A10	Provide briefing, via ELOs, on health and environmental	

	priorities and advice to response units	
A11	Ensure all other identified & agreed tasks are actioned	
A12	Ensure all essential EG information requirements are identified	
A13	Ensure the information and data necessary to inform operational advice is acquired	
A14	Ensure an Impact Assessment process appropriate to the scale and potential effect of the incident is initiated	
A15	Ensure further alert and mobilisation of additional staff and resources continue as required	
A16	Ensure nominated & additional deputies/substitutes for EG key & support roles are alerted in good time	
A17	Ensure establishment & mobilisation of necessary health and scientific personnel	
A18	Obtain regular briefings from MCA and ELOs	
A19	Give regular briefings to EG and room-briefs to support staff	
A20	Maintain close liaison with Impact Assessment Coordinator	
A21	Ensure H&S procedures for EG are implemented & managed	
B	**INCIDENT DOES NOT REQUIRE EG TO BE CONVENED**	
B1	Establish contact with core EG members and other key organisations relevant to the incident: • Brief/receive briefing – ***see ESSENTIAL ALERTINFORMATION CHECKLIST (Appendix 4)*** • Agree initial advice to MCA/response units • Agree procedure in event that incident escalates	
B2	Provide initial advice to MCA/response units	
B3	Ensure alert of all relevant bodies and individuals is initiated – ***see NOTIFICATION CHECKLIST (Appendix 5)***	
B4	Establish and maintain routine exchange of information with MCA or appropriate response unit(s)	
B5	Consider transferring Chair role to more relevant core EG member if appropriate	
B6	Establish and maintain routine exchange of information with key EG members relevant to incident	
B7	Provide briefing on health and environmental priorities and advice to response unit(s)	
B8	Revise and update advice to MCA or appropriate response unit(s) as appropriate	
B9	Standby to increase alert and mobilise key personnel in the event that the incident escalates	

APPENDIX 3
EG CORE MEMBERS EMERGENCY CONTACT DETAILS

Restricted Document – provided separately

APPENDIX 4
ESSENTIAL ALERT INFORMATION CHECKLIST

Incident:	**Date:**

Questions to MCA or notifying organisation:	
What is the nature of the incident?	
What is the pollutant? • **specific name** • **composition**	
What is the scale of pollution?	
What is the exact location of the incident?	
What time did the incident occur?	
What is the current extent of the pollution? • **aerial** • **at sea** • **on shore**	
Sea and weather conditions:	
Is there a known risk to human health?	
What is the risk of further pollution?	
What is the risk of the casualty / source of pollution moving elsewhere?	
What response action has been taken?	
What response action is planned?	
Who has been notified? **[Record on *NOTIFICATION CHECKLIST- Appendix 5]*]**	
Request copies of chemical / hazard data sheets for pollutant and all other potential pollutants which may be released following incident.	

APPENDIX 5
EG NOTIFICATION CHECKLIST

[*Not all contacts will be necessary for every incident*]

Incident:	**Date:**

Core EG members	**When notified/by who**	**Contact name (and deputy)**
Natural England		
Environment Agency		
Inshore Fisheries Conservatio Agency		
Marine Management Organisation		
Public Health England		
Maritime & Coastguard Agency		
Adjacent SEG chairs		
North Wales		
Scotland		
Associate EG members		
Food Standards Agency		
RSPB		
Cumbria Wildlife Trust		
Lancashire Wildlife Trust		
Cheshire Wildlife Trust		
National Trust		
RSPCA		
Other (list)		

APPENDIX 6

GENERIC AGENDA FOR FIRST EG MEETING

1. Introductions
   1.1. Personnel
   1.2. EG accommodation – fire precautions, H&S issues
2. Incident briefing – *use ESSENTIAL INFORMATION CHECKLIST*
3. Key roles
   3.1. Allocation of key roles & confirmation of role holders
   3.2. Briefing to EG on identities and locations of ELOs
4. Identification & analysis of immediate risks and threats
   4.1. Identification of public health risks
   4.2. Identification of immediate environmental risks
   4.3. Identification of immediate information requirements
      - Fate & behaviour of pollutant
      - Immediate operational advice requirements
      - Immediate impact assessment requirements
   4.4. Identification of health and environmental priorities and initial advice to response units
   4.5. Identification of immediate tasks & allocation of tasks
   4.6. Identification of further personnel and resources required
5. Establish timetable for EG briefings/meetings and standing agenda items
6. Establish communications protocol
7. Establish working procedure

APPENDIX 7

RESPONSIBILITIES OF SEG/EG CORE MEMBERS

Natural England

Natural England was established by the Natural Environment and Rural Communities Act 2006 with a purpose ' to ensure that the natural environment is conserved, enhanced and managed for the benefit of present and future generations, thereby contributing to sustainable development'.

Natural England's advice will be sought for any pollution incident within coastal and marine waters of England extending to the territorial limit of twelve nautical miles to sea. We will also provide advice for spills that occur outside this area but have the potential to impact habitats or wildlife within.

Natural England responsibilities are to provide advice on:

- Nature conservation including designated sites and site features
- The environmental 'appropriateness' of proposed response actions e.g. shoreline clean-up or dispersant application
- Monitoring the environmental effectiveness of response actions

Natural England will provide this advice to the main three response units, usually though the formation of an Environment Group set up to provide in response to the incident; although it should be noted that not all incidents require the formation of these separate response cells. The response will be dictated by the scale and nature of the incident.

Environment Agency

The Environment Agency operates a 24 hour incident response service to incidents that have caused or have the potential to cause harm to human health, the natural environment (air, land and water) or property.

Marine Pollution incidents require a very specific Environment Agency response dependent on the source (sea or land). The Agency's role and responsibilities are specified within the National Contingency Plan for Marine Pollution Incidents. In general terms we will:

- Take the lead for spills from land-based sources upto three miles seaward of the territorial baseline with support from the Maritime and Coastguard Agency (MCA) and local authorities.
- Be represented at the SCG with a leading role on Environmental Issues. Provide appropriately briefed and trained staff to fulfil these roles.
- Hold a joint strategic post incident review following all major spills to evaluate the effectiveness of the response.
- Provide additional resources including:
    - aerial surveillance resources (integrated with the Maritime and Coastguard Agency and covered by a Protocol);

- small boats for monitoring work and sea going survey vessels (if operating under contract to the Environment Agency in the relevant area).

- Take a lead role in organising environmental impact assessment monitoring of a major incident.
- Take action alongside other organisations to reduce the impact of spilt oil by booming estuaries. The presumption is that we will not now normally do this ourselves but will arrange for suitably trained contractors to carry booming under the direction of Agency staff.
- May be involved in assisting local authorities in clean-up operations or in working with other environmental protection agencies in discharging their conservation and other duties.
- Advise on and regulate the temporary storage and final disposal of waste oil, oil-contaminated sand and oiled beach materials.

Public Health England

Public Health England (PHE) is an executive agency of the Department of Health. PHE provides an integrated health protection service to ensure that the public are protected from threats to their health from infectious disease and environmental hazards such as radiation, chemicals and poisons.

Local PHE Centres (PHEC) provide a 24 hour integrated public health service delivering expertise, information and intelligence. PHE's Centre for Radiation, Chemical and Environmental Hazards (CRCE) is a source of specialist advice and operational support through PHECs, providing expert advice on the public health risks of chemicals in the environment as part of PHE's emergency preparedness and response. In response to coastal and marine pollution incidents, PHE would respond with representatives from both the relevant local PHEC and CRCE.

Marine Management Organisation

The Marine Management Organisation (MMO) is an executive non-departmental public body, sponsored by the Department for Environment, Food and Rural Affairs.

We license, regulate and plan marine activities in the seas around England and Wales so that they are carried out in a sustainable way.

This helps the government achieve its vision for clean, healthy, productive and biologically diverse oceans and seas.

We were created by the Marine and Coastal Access Act 2009 and are now a team of almost 300 people. We combine our Newcastle upon Tyne and London operations with a local presence around the English coastline in North Shields, Scarborough, Grimsby, Lowestoft, Harwich, Hastings, Shoreham, Poole, Portsmouth, Brixham, Plymouth, Penzance, Preston and Whitehaven.

The marine pollution response team operate a 24/7 system to respond to marine pollution incidents and give approvals for the use of oil spill treatment products where appropriate. In addition we are members of the incident environment group and we advise the Counter Pollution Branch of the MCA on environmental risks from hazardous cargoes lost at sea. Our role includes briefing ministers on the progress of the incident and commissioning any relevant monitoring, research and impact assessment. This team also administers the approval of oil spill

treatment products, maintaining the MMO Oil Spill Contingency Plan and reviewing and inputting into the contingency plans of other organisations (MCA's National Contingency Plan, port and harbour contingency plans and offshore installation contingency plans).

North West Inshore Fisheries and Conservation Authority (NW IFCA)

The North-Western Inshore Fisheries and Conservation Authority (NWIFCA) was set up in April 2011 (along with 9 other IFCAs around the English coast), with responsibilities to manage the exploitation of sea fisheries resources, achieve sustainable inshore fisheries and help achieve conservation objectives within its district. It was formed from the amalgamation of the North West and Cumbria Sea Fisheries Committees, with a district extending from the Welsh administrative boundary in the Dee Estuary to the Scottish administrative boundary in the Solway Firth. The seaward extent is from the shore out to 6 nautical miles. There are shore-based NWIFCA fishery enforcement officers located across the district as well as a number of patrol vessels. The Authority consists of representatives from constituent local authorities and different sectors relevant to the marine environment.

Maritime and Coastguard Agency

The MCA is an executive agency of Defra and has overall responsibility for implementation of the National Contingency Plan for Marine Pollution from Shipping and Offshore Installations (NCP)

APPENDIX 8

EG ROLES AND RESPONSIBILITIES:

Chair & Deputy Chair

Role:
The Chair and Deputy Chair will be responsible for managing the Environment Group delivery and 24/7 resourcing as required, and ensuring that the main functions of the EG are fulfilled,

Actions of the Chair & Deputy Chair

- the provision of effective and timely advice to, and maintenance of the flow of information between the EG and response centres, on all aspects of public health and the environment (tier 2 and tier 3 incidents);
- in tier 1 incidents (where response units are not set up), the provision of a conduit of advice and information to the MCA, Port Authority or Local Authority (as appropriate) on all aspects of public health and the environment;
- the prompt initiation and effective co-ordination of any impact assessment that is deemed to be appropriate.
- management of the EG, including the development deployment of resource and maintenance of the most appropriate group structure and mode of operation and to ensure that all involved understand their own role and the roles of others around them.
- ensuring that the strategic objectives and targets of the EG are identified and met;
- ensuring that the human and other resources required by the EG to fulfill its functions are secured as and when required;
- ensuring that the ELOs and their deputies appointed to response centres are properly supported at all times;
- co-ordinating the activities and outputs of the component groupings within the EG;
- ensuring that all health and safety requirements and welfare needs of the EG are met;
- ensuring that there is an external link between the EG and the media and media centre and that briefings are produced/given to the media when required;

After the Incident

- Contribute to the post incident debriefing
- Lead the EG component of the report

EG ROLES AND RESPONSIBILITIES:

Environment Liaison Officer (ELO) – Marine Response Centre (MRC)

Role:

- The primary role of the MRC ELO and deputies will be to provide the EG's contribution to response operations initiated and co-ordinated by the MRC together with the Chair, ensuring that the communications protocol between the ELO and deputies (hence the MRC) and the EG is rapidly put into place, clearly understood and adhered to..

Actions of the Environment Liaison Officer (ELO) – Marine Response Centre (MRC)

- the provision of focussed, integrated and prioritised public health and environmental advice to the MRC, within the required time-frame;
- the maintenance of the two-way communications and flow of information between the EG and MRC (and vice-versa) ensuring the feedback of all relevant information from the MRC to the EG on the fate and behaviour of pollutants at sea, and counter pollution measures being considered or implemented by the MRC, and their implications for health and environmental priorities and sensitivities;
- keep themselves appraised of the predicted and actual fate and behaviour of pollutant(s) at all times;
- provision of integrated advice on the optimum response options/counter pollution measures at sea, in terms of public health requirements and Net Environment Benefit, within the required time-frame;
- monitoring of at-sea counter pollution operations
- ensuring that the EG is kept fully up-to-date with all aspects of at-sea counter pollution operations and of their implications for health and environmental resources and sensitivities at all times, through regular communications (in accordance with the EG communications protocol)
- maintenance of full awareness, and rapid assessment of, risks to public health and environmental resources and sensitivities
- record keeping: ensuring that records of the following are maintained:
    - the fate and behaviour of pollutant(s) at sea;
    - at-sea counter pollution measures taken by the MRC and their efficacy;
    - all communications between the EG and MRC ELO e.g. on agreed EG priorities for resource protection and response to pollution; predicted/actual threats to the shoreline;
    - the advice given by the ELO to the MRC and how that advice is used/acted upon (i.e. decisions made by the MRC);
    - all information passed to the MRC by the EG via the ELO.

After the Incident

- Contribute to the post incident debriefing
- Contribute to the EG component of the report

EG ROLES AND RESPONSIBILITIES:

Environment Liaison Officer (ELO) – Salvage Control Unit (SCU)

Role:

The primary role of the SCU ELO will be to provide the EG's contribution to response operations initiated and co-ordinated by the SCU.

Actions of the Environment Liaison Officer (ELO) – Salvage Control Unit (SCU)

- the provision of focused, integrated and prioritised public health and environmental advice to the SCU, within the required time-frame
- the maintenance of two-way communications and flow of information between the EG and SCU (and vice-versa);
- ensuring the feedback of all relevant information from the SCU to the EG on the status of the casualty, salvage options under consideration by the SCU and their implications for public health and environmental priorities and sensitivities
- together with the Chair ensuring that the communications protocol between the ELO and the EG is rapidly put into place, clearly understood and adhered to
- maintain a full awareness of the progress of salvage operations options, and predicted/actual pollution at all times;
- maintenance of full awareness, and assessment of risks to public health and environmental resources and sensitivities
- provision of focussed, integrated advice on the optimum salvage options in terms of public health requirements and Net Environment Benefit, within the required time-frame;
- monitoring of and reporting to the EG on salvage operations, together with any predicted or actual release of pollutants from the casualty
- ensuring that the EG is kept fully up-to-date with all aspects of salvage operations, predicted or actual release of pollutants from the casualty and implications for health and environmental resources and sensitivities at all times, through regular communications (in accordance with the EG communications protocol) with the Chair/Deputy Chair
- the maintenance of records of:
    - the incident and any response initiated and co-ordinated by the SCU;
    - all communications between the EG and ELO;
    - the advice given by the ELO to the SCU, and how that advice is used/acted upon by the SCU;
    - all information passed to the SCU by the EG via the ELO;
    - efficacy (in terms of Net Environmental Benefit Analysis – NEBA) of decisions taken by the SCU, and subsequently implemented.
-

After the Incident

- Contribute to the post incident debriefing
- Contribute to the EG component of the report

EG ROLES AND RESPONSIBILITIES:

Environment Liaison Officer (ELO) – Strategic & Tactical Coordination Groups (SCG & TCG)

Role:

The primary role of the SCG & TCG ELOs will be to provide the EG's contribution to shoreline response operations initiated and co-ordinated by the SCG or TCG

Actions of the Environment Liaison Officer (ELO) – Strategic & Tactical Coordination Groups (SCG & TCG))

- the provision of focused, integrated and prioritised advice on all aspects of public health and environmental resources at risk or impacted, within the required time-frame;
- the maintenance of two-way communications and the flow of information between the EG and SCG & TCG (and vice-versa);
- ensuring the feed-back of all relevant information from the SCG or TCG to the EG, on the fate and behaviour of pollutant(s), SCG or TCG clean-up strategies and programmes of work on individual shorelines, and the implications for public health and environmental resources, sensitivities and priorities for protection and response;
- ensuring that requests for assistance made by the EG for assistance from the SCG or TCG and vice-versa are communicated in the required time-scale;
- together with the Chair, ensuring that the communications protocol between the ELO and deputy(ies) and the EG is rapidly put into place, clearly understood and adhered to
- maintenance of personal awareness and understanding (at all times) of:
    - progress with salvage and/or at sea counter pollution operations and possible implications for the shoreline;
    - actual and predicted fate of pollutant and behaviour of pollutant at sea and consequent threats to the shoreline;
    - fate and behaviour of pollutant on-shore: where, how much, what is it doing, what is it threatening, what has it impacted?
    - actual and planned shoreline response.
- provision of focused, integrated advice on public health and environmental implications of actual or predicted shoreline pollution and on the planned response (to optimise Net Environmental Benefit from the planned response). Where appropriate, the ELO should seek identification and assessment (using Net Environmental Benefit Analysis – NEBA) of alternative response options/strategies;
- provision of proactive advice on public health and environmental priorities for shoreline protection and response
- representation of the EG within the SCG or TCG for shoreline response; attendance of meetings and provision of regular briefings and up-dates to the Chair/Deputy Chair on all aspects of the shoreline response;
- ensuring that requests for assistance (e.g. with live wildlife casualties; collection of dead wildlife casualties required for impact assessment by the EG; establishment of leave alone sites; fate and behaviour of pollutant) are passed between the SCG or TCG and EG in the required time-frame

- monitoring of and reporting (to the EG) on the shoreline clean-up operations: progress; efficacy; implications for public health and environmental resources;
- attendance of site meetings as requested by the SCG or TCG (the Chair/Deputy Chair of EG to be notified of the SCG or TCGs request first, and arrangements for attendance will be made by the Chair/Deputy Chair);
- ensuring that the SCG or TCG has copies of any generic EG advice on specific clean-up techniques

After the Incident

- Contribute to the post incident debriefing
- Contribute to the EG component of the report

Note: It is anticipated that in a tier 3 incident, the ELO will have more than one deputy and will also have dedicated secretarial support.

EG ROLES AND RESPONSIBILITIES:

Administration Manager

Role:

In a marine pollution incident requiring the convening of the EG, the primary role of the Administration Manager will be to provide admin support for the core EG and any sub-groups set-up within the EG, to help ensure that the EG fulfills its main functions.

Actions of Administration Manager)

- organisation and management of clerical/secretarial support for the EG;
- implementation of the EG's record-keeping, and document management and control protocols;
- organisation of access to photocopying, fax and telecoms facilities for the EG;
- procurement of stationary and other supplies required by the EG;
- liaison with IT and other providers of specialist equipment or services (eg telecoms) required by the EG;
- ensuring that access to the EG is controlled (security);
- ensuring that the welfare needs of the EG (eg feeding and watering) are met.
- budget management (where appropriate).
- Ensure all EG representatives are keeping appropriate records and logs by EG including
    - SCG Technical Team and Strategy Sub-group meetings and the input made by the ELO;
    - SCG meetings;
    - communications between the ELO and the core EG;
    - requests to/from the EG and to/from the SCG, and how/when actioned;
    - advice provided by the ELO to the SCG and how that advice is used by the SCG;
    - verbal reports from and debriefings of SCG controlled Shoreline Clean-up Assessment Teams (SCATs); copies of SCAT report forms tabled in the SCG;
    - data and information (in written, video or photographic form) on shoreline pollution and response that are collected by, or on behalf of, the SCG (essential for tracking the response and for impact assessment of the clean-up operations as well as of the pollutants);
    - written records of clean-up strategies agreed and implemented by the SCG; status/progress reports on clean-up operations initiated on individual shorelines (including waste management);
    - copies of any policy statements made by the SCG; protocols developed by the SCG (e.g. on waste management); use of dispersants (if permitted) and other oil treatment products; determination of agreed 'end points' of individual shoreline clean-up operations);
    - records of 'dead wildlife' passed to SCG (e.g. by Beach Masters; SCATs);
    - copies of work programmes developed by the SCG, to pass to the Chair and core EG, thus assist the EG to plan its contribution to the shoreline response in

terms of NEBA, proactive, advice, impact assessment and monitoring.
After the Incident • Contribute to the post incident debriefing • Contribute to the EG component of the report

EG ROLES AND RESPONSIBILITIES:

Environmental Assesment Coordinator

Role:

The primary role of the Environmental Impact Assessment Co-ordinator is chair an Environmental Impact Assessment (EIA) sub-group which would likely to comprise technical specialists from the following organisations:MMO / IFCA / EA / Natural England

to ensure that the broad aims and objectives of impact assessment following a marine pollution incident are met in full both during response to an incident where an EG is activated and its aftermath. Be able to describe and quantify the extent to which the environment was affected by it. In the event of a marine pollution incident requiring the convening of the EG, it is likely that an Environmental Impact Assessment sub-group will be formed, the main tasks of which will be to initiate, coordinate and report on any impact assessment that is deemed to be appropriate and necessary.

Actions of the Environmental Coordinator

- liaison with statutory agencies and the Welsh Assembly Government with respect to priorities for impact assessment, national resources required and assessment protocols;
- management of the sub-group including the development and maintenance of the most appropriate group structure;
- ensuring the integration of activities and research initiated by parent organisations to avoid duplication and/or omission of key tasks;
- chairing the Environmental Impact Assessment sub-group within the EG;
- ensuring consensus and common understanding of the general aims and objects of impact assessment and or priorities for EIA within the EG and between the statutory agencies, WAG and the EG;
- ensuring that appropriate action is taken to meet the data requirements of the EIA sub-group and statutory agencies (eg fate and behaviour of pollutant(s); wildlife casualties; clean-up operations carried out by the response centres);
- maintaining close liaison with the Chair and core EG, on behalf of the EIA sub-group, and ensuring that requests from the EIA sub-group for information from the response centres are communicated quickly and efficiently via the Chair and ELOs;
- responding (as quickly as is reasonably possible) to requests for information on the impact of an incident on environmental resources from the Chair and core EG (eg to brief the media or politicians);
- ensuring that initial impact assessment of acute effects of pollutant(s) is carried out in a timely and coordinated fashion;
- identifying any gaps in impact assessment, and subsequently taking steps to plug these;
- ensuring that the EIA sub-group has sufficient admin and data management support.
- preparing any interim reports on the environmental impacts of an incident for the statutory agencies and government;
- assisting (where appropriate) statutory agencies to prepare and manage any contracts let;

- liaising with organisations not represented in the EIA sub-group but whose expertise may be required to complete specific environmental impact assessment tasks;
- ensuring that all the work carried out by or on behalf of the EIA sub-group is thoroughly documented and that the data collected are appropriately archived;

preparation of a final report on the work carried out by or on behalf of the EIA sub-group and (if required), ensuring an efficient and orderly handing-over of responsibilities of and data collected by the EIA sub-group to a Government-appointed committee

The broad aims of environmental impact assessment are to:

- determine and quantify any environmental impacts of a marine pollution incident;
- determine the net environmental benefit of advice provided by the EG to response units, and of response actions taken by the response units;
- meet the statutory agencies duties to monitor and report on public health, and on the environmental condition of *inter alia*, designated sites, species and waters;
- meet public and political requirements for environmental information.

In addition to these broad aims, impact assessment should meet the following specific objectives:

- to determine concentrations of pollutant in the environment;
- to ascertain how levels of contaminants in the environment change over time, and to compare those changes with baseline data;
- to determine the environmental effects of shoreline and at –sea response;
- to determine the acute and chronic effects of the pollutants on environmental features and their time-scales, based *inter-alia* on the assessment of the condition, population and distribution of species in their habitats, in comparison with those in control sites and trends in other areas remote from the contamination;
- to determine the longer-term impacts on wildlife populations and distribution (spatial and temporal), based on reproductive and behavioural effects;
- to predict the likely rate of recovery of species and habitats following contamination;
- to monitor the recovery of species and habitats following contamination;
- to provide an overall assessment of the environmental impact of the incident in the context of previous incidents.
-

After the Incident

- Contribute to the post incident debriefing
- Contribute to the EG component of the report
-

EG ROLES AND RESPONSIBILITIES:

Information Manager

Role:

In a marine pollution incident requiring the convening of the EG, the EG may require an Information Manager, whose primary role will be to collate and manage all incoming and outgoing information and data relating to the EG's functions and responsibilities on behalf of the EG and any sub-groups set up within the EG

The Information Manager will be required to liaise closely with the Chair and core EG, the Administration Manager and the Environmental Impact Assessment Co-ordinator

Actions of Administration Manager)

- collation and archiving of all incoming information in the appropriate format;
- maintenance of maps, charts and stateboards showing the current situation and key information (e.g. key contacts etc.), and archiving of used charts etc);
- collation and dissemination of operational information received within the EG;
- collation and dissemination of information on the effects of the incident on public health and environmental resources, within the EG;
- archiving of information received by the EG
- ensuring that any pre-incident data on the location and seasonality of environmental resources and their sensitivities are available to the EG, including the ELOs;
- ensuring that data collected by EG during the incident is made available to the parent organisations represented in the EG, to enable them to meet statutory obligations and to contribute to impact assessment.
- provision of information on wildlife casualties and other effects of an incident to the Chair and core EG, to enable the EG to prepare briefings for the media and politicians.
- liaison with the Administration Manager in the event of problems arising with IT equipment and software
- responding to specific requirements of individuals and groupings within the EG for information, as well as to their parental organisations.
-

After the Incident

- Contribute to the post incident debriefing
- Contribute to the EG component of the report

APPENDIX 9
EG INCIDENT LOG

INCIDENT:		DATE:				**Page:**	
			dd	mm	yy		

Serial	Time	***Information***	Initials	***Action taken***	Initials	Time
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APPENDIX 10
Environment Group advice note template

North West England - Environment Group Advice Note		
Advice Note Ref No.		
Date (yyyymmdd)		Time (hh:mm)
Incident Name		
EG preffered response options:		
Sensitivity Summary:		
EG Comments (for use when commenting on response plans i.e. Salvage		
Sensitivity summary supporting information		

APPENDIX 11
Cost & Time recovery records

Joint Claims
For smaller incidents the MCA are prepared to lead on cost recovery action across the public sector and specifically for bodies identified in this NCP. However, it is still necessary for claimants to follow the advice provided in this document. The decision for the MCA to lead is taken on a case by case basis and subject to agreement by all parties at the time.

The MCA's extensive experience in claims suggests the following items of best practice:

- any expense must actually have been incurred and third party invoices provided;
- response measures must be reasonable, proportionate and justifiable;
- there needs to be a summary of events – a description and justification of the work carried out at sea, in coastal waters and on shore – together with an explanation of why the various working methods were selected;
- for chartered vessels, investigate the rates quoted and look at the SCOPIC tariff rates;
- apply the industry standard of 100% of hire rate for in-use and 50% rate for stand-by;
- ensure MCA's contractors, or local authorities acting on behalf of the Agency, apply the MCA policy for equipment hire charges when acting on behalf of MCA in response to an incident;
- keep a record of the dates on which work was carried out at each site; in this context, date and time stamped photographs are extremely useful;
- keep a record of the number and categories of response personnel, regular or overtime rates of pay and who is paying them;
- keep a record of the travel, accommodation and living costs for response personnel;
- keep a record of the equipment costs for each site: types of equipment used, rate of hire or costs of purchase (bearing in mind residual values to be deducted), quantity used, period of use (in use or standby);
- ensure that any damaged equipment is photographed and assessed by an independent body prior to repair or replacement;
- during cleaning or restoration of equipment or vessels, they should not be brought to a state better than at the commencement of the hire/charter;
- keep a record of materials consumed in the response, for example, sorbent and dispersant;
- keep a record of the cost of temporary storage, transport, treatment and disposal of waste; and
- keep a record of any other incident specific cost relating to the response in any way, e.g. oil analysis, reinstatement, impact assessments, etc.

Record keeping

For the purpose of financial record keeping, it is essential to appoint a financial controller at a very early stage in the incident to keep adequate records and control expenditure. Responders should not discard any relevant document (including status board information and maps used by the SCU, OCU, MRC and Shoreline Management Group). All data should be backed up and catalogued on a regular basis – at least daily.

It is not possible to specify the precise form of records, this varies with the circumstances. However, there are two points to keep in mind:

- records of any incident act as the source material for many incident related purposes; and
- since responders cannot know the particular purpose that records will serve in advance, record keeping should err on the side of too much rather than too little detail.

The record should clearly show information received, decisions taken, orders given, and action taken. For example, responders may use aircraft for reconnaissance. In this case, there should be a record not only of when they called the aircraft out but of take-off times, landing times, details of any oil found, the area searched, who was on board the aircraft, who received the information and when. For dispersant spraying operations, records should specify the area of operations and indicate the duration of spraying, the amount, type, age, and efficacy of dispersant used, and the results obtained.

As a further indication of the level of records required one example would be for the hiring-in of an item of equipment, the hirer should seek to clarify the following items:

- member of staff that authorised and placed the order;
- the reason for hiring the equipment;
- date and time item actually hired;
- organisation hired from;
- evidence of any research relating to cost of hire
- quantity of each item actually hired;
- for larger pieces of equipment (particularly chartered vessels) it would be useful to take photographs of the condition of the item prior to use for response activities;
- if more than one item of any type is hired, devise a system for unique identification;
- how it was delivered / transported;
- where it was actually delivered to;
- who took delivery;
- a daily activity record of what the item was used for, including the location of use;

- if item is damaged – photograph damage;
- brief description of how the damage occurred;
- do not repair until approval or advice has been reached with an insurance representative on site (i.e. the SCR or a surveyor appointed by the insurers);
- dates actually used for the response;
- dates the item was on standby at the scene of the incident;
- date off-hired;
- condition of the item when returned to owner; and no betterment of equipment on return to owners.

Record keeping requires a heavy commitment in terms of minute takers, message takers, procurement specialists and financial experts. There are specialist firms that offer tracking and recording services for clean up operations and the appointment of such a firm may be justifiable following a major spill from an oil tanker. In such a case it should be possible to recover the cost of using such firms, or temporary agency staff, from the shipowner, insurer and/or the IOPC Fund.

It is important to record decisions and the opinions of all the parties involved in addition to agreements or points of disagreement. This applies equally to ITOPF who report to ship owners, P&I Clubs and the IOPC Fund and are likely to offer advice to all parties involved in the response on counter pollution operations. It applies also to others such as cargo owners, local authorities and the Environment Group. The records should show whether they agree or express no opinion. If they disagree, the records should identify the reasons, if possible. Records should distinguish criticism made at the time of an incident from criticism made with the benefit of hindsight.

Like any operation involving the expenditure of large sums of money, the usual rules of proprietary, accountability and the need for a fully detailed audit trail apply.