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Naturiol**  
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Wales

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## **DRAFT NATIONAL CONTINGENCY PLAN FOR MARINE POLLUTION FROM SHIPPING AND OFFSHORE INSTALLATIONS (NCP)**

Dear Gail,

We welcome the amendments to the National Contingency Plan and the clarity it provides in relation to Civil Contingency Act. Please find below a description of our comments.

### **General comments**

The plan would benefit from a summary response page or aid memoir near the document front to include such item examples as a command and control diagram, tiered response, responsibility for clean up and important contact information. This would facilitate important information being transferred into local emergency plans.

As a general comment we welcome the slimmed down version. However the document is now a framework plan hyperlinked to electronic documents themselves with hyperlinks. The use of appendices with summary information and hyperlinks could assist in providing a standalone plan. Reliance on hyperlinks outside MCA control could in future lead to the links failing.

We would welcome inclusion of such flowcharts to show the relationship between different command groups both with the NCP and under the Civil Contingencies Act structures. By way of detail, it would be advantageous to explain the interaction of the Tactical Co-ordinating Group which deals with the on-shore operational response plan and has replaced the Shoreline Response cell; further explanation is required to include the role of

Recovery group to ensure no duplication of role as it can be expected that these groups have the potential to merge during response phases.

The flowcharts and structure diagrams included in the draft version are not presented in the clearest form and so are not quickly and easily understood. Such flow charts and decision trees should cater for all audience needs so to provide a comprehensible pictorial description of the command and control and /or relationship of certain groups.

### **Aim and Purpose**

As a matter of detail paragraph 1.10 does not include the word “pollution” and refers to a broader “maritime emergency”, it would be useful to provide an explanation of “maritime emergency” which could presumably cover pollution, hazardous noxious substance pollution or other instances when a collective emergency response is required, as elsewhere referenced. The words marine pollution is defined in the legislation section but not maritime emergency.

Paragraph 1.11 should also refer to other key emergency plans such as the Local Authority Major Incident, Oil Pollution and/or Recovery plans as these documents use the NCP content and structure for the local response.

A schematic diagram showing the response cells and links with the Environment group would be useful. There are useful diagrams in circulation making clear the role of response cells in different response scenarios covered by Civil Contingency Act and National Contingency Plan and these would be useful inclusions.

The document recognises that there are devolved administrations in the UK; however it still refers to “lead Government bodies” or “central government bodies”. These should be referred to a “UK Government bodies”. In Para 6.2 the phrase “the owners” should be replaced by MCA. The list of key organisations is arbitrary and should be deleted. MMO and Environment Agency are not UK or central government key organisations – they have more limited responsibility.

A comprehensive list of definitions and acronyms are used throughout the document and an appropriate glossary is required.

All hyperlinks, by way of detail, should reference a meaningful title, not e.g. “viewed by clicking here”.

Record keeping, as we all know, is imperative to capture decisions regarding the response and in claiming the cost of the emergency. Sections in operations should be cross referenced with section 22. Best practice should be clearly referenced.

### **SOSREP role**

The SOSREP has an important role in applying strategic and if necessary operational direction as appropriate in such incidents. A number of large scale exercises and incidents have occurred in recent times where the SOSREP has had positive interaction with Strategic Co-ordinating Groups and Devolved Government. It would be beneficial to reference that succinct timely strategic liaison is required between SOSREP and “Gold” before any arbiter role is required. This would build on the good relationships between at sea and land commands recently carried out.

### **Oil Pollution Emergency Plans**

As the national strategic response plan, it would be useful if the relationship between the offshore plan and links to the environment Group and Strategic and tactical co-ordinating group could be described.

### **Environment Group**

The role of the Environment Group is not described in the same terms as the current STOp notice. For clarity it would be useful to retain the bullet point structure under section 2 of that document, also maintaining consistency with the bullet point indented role of the Scientific and Technical Cell which follow this paragraph in the National Plan draft. The Environment Group may convene of its own volition. It may be useful to highlight that a group could come together to co-ordinate the response to wildlife casualties from chemicals such as PIB.

It would be useful to provide a hyperlink to the MMO website which holds UK SEG plans. Suggest that the roles and responsibilities for EGs are listed in a similar fashion to STAC roles & responsibilities.

### **Scientific Technical Advisory Cell**

It is unfortunate that there has been no ideal model emerging for the relationship between Environment Group and Scientific and Technical Advice Cell. The paragraphs 9.15 -9.17 accurately describe the current position in Wales.

The reference to a Premium Monitoring Co-ordination Cell or “equivalent” in paragraph 9.17 should be retained as in Wales a Monitoring Co-ordination cell will be incorporated into the Environment Group to ensure one conduit for all environmental monitoring. This allows clear line of sight strategies to be applied to the incident. Premium and all other best practice will be consistently applied.

It may be beneficial to include devolved government arrangements at this point. There are also useful hyperlinks to former Health Protection Agency information given at the last ARCOPOL conference which would support the PREMIAM guidance at this point. The use of best practice guidance such as PREMIAM work should be referenced in the Environment Group STOp note 2/2009 and account for differences in devolved administrations.

### **National Assets, Resources and Response Options**

Paragraph 12.6 implies that operational control of booming will be retained by the MCA. It would be useful to clarify if the MRC will be responsible. Links will need to be described back to the local authority led Strategic and Tactical response centres.

### **Dispersants**

This section accurately describes the current position in Wales.

### **Harbour and SOSREP co-operation**

As a matter of detail, offences under the Water Resources Act are now dealt with under the Environment Permitting Regulations 2010. In order to keep the plan as current as possible references to specific legislation could be limited to the minimum necessary.

### **Shoreline Response and Waste Management**

In this section more detail on the activities expected to be carried out by the Civil Contingency Act groups would be useful including links to guidance for local authority onshore plans. The scale and duration of a tier three spill will be greater and longer than most other incidents. Since the Recovery Co-ordinating group will deal with waste management; the sections should be combined with the appropriate references.

The only liaison officer roles mentioned in the document are Government Liaison Officers, which though fulfilling a important role in an incident it must be noted that they are not the only liaison officers functioning between specific operational and strategic cells. For this reason the reference to government liaison officer should be removed and replaced an appropriate paragraph which encompasses all liaison officers' roles.

Reference should be made to Shoreline Cleanup Assessment Technique (SCAT) and their relationships with Shoreline response.

### **Wildlife Response**

The wildlife response section could be better linked to the role of the Environment Group. The Environment Group would usefully provide a co-ordinating and support role to wildlife response including recording casualties from unknown source pollution. Our understanding is that an Environment Group would activate to assist the wildlife response.

## **Communications**

Under current arrangements the Strategic Co-ordination group would issue SITREPS in relation to its activities and individual organisations such as Natural Resources Wales would issue its sponsoring body, Welsh Government with its own SITREP.

## **Other**

Shoreline pollution may not specifically appear on current Local Resilience Forum risk registers or be given the correct allocation of planning resources for such types of incidents. As a recommendation from a Category One organisation that has numerous risks under our responsibility and involved in the response to any incident with environmental consequences, we would welcome more local information included in Civil Contingencies Act risk assessments produced by the MCA. Our recommendation would be to produce risk assessments in line with the DCPSO geographical regions rather than a national risk assessment. This approach would provide greater detail for planning assumptions and risk planning while referencing different environmental and commercial interests against the balance of resource workload and generic national reference.

## **Conclusion**

Overall the changes to the plan to recognise Civil Contingency arrangements is welcome and will provide a coherent framework for future plan amendments. The new arrangements would ensure that a generic response framework exists.

Please do not hesitate to contact myself if you have any questions.

Yours Sincerely



Paul Edmonds

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