

AN APPRAISAL OF NATIONAL OIL SPILL RESPONSE CAPABILITY IN IRELAND



Stephen Saunders
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Purpose of the Study

- Appraisal of national Tier 3 oil spill preparedness and response capability in Ireland;
- Identify gaps and ways to improve response preparedness;
- To verify that:
 - Standard components of an oil spill response plan are executable in Ireland;
 - Response equipment and components are in place and to assess compliance with regulatory and Irish Coast Guard (IRCG) requirements and industry best practice;
- Benchmarked against:
 - Australia;
 - Denmark;
 - Norway;
 - UK.



Methods

Consultation Questionnaires on:

- Operations,
- Equipment,
- Personnel,
- Training and Processes.

Consultation with:

- Government Depts/ divisions, agencies and authorities
- Local Authorities
- Ports & Harbour Authorities
- Industry and Response Organisations

Category	Stakeholders
Government Departments/ Divisions/ Agencies/ Bodies and National Authorities	Department of Transport, Tourism and Sport (DTTAS): Irish Coast Guard (IRCG) Maritime Transport Division (MTD) Department of Communications, Climate Action and Environment (DCCAE): Marine Institute Department of Agriculture, Food and the Marine (DAFM): Marine Engineering Division Commissioners of Irish Lights
Local Authorities	Donegal County Council Sligo County Council Clare County Council Limerick City & County Council Kerry County Council
	Cork County Council Waterford City & County Council Wexford County Council
Port / Harbour Authorities	Sligo Harbour Office Rossaveal Harbour Office Galway Harbour Company Shannon Foynes Port Company Castletownbere Port of Cork Company Bantry Bay Port Company Port of Waterford Rosslare Port Authority Dublin Port Company ⁶
Industry and Response Organisations	Fenit Energy & Bantry Terminals Ltd (BTL) Briggs Marine Emergency Service Ltd (BMES) OSRL (Oil Spill Response Ltd, Southampton) Oiled Wildlife Response Network (OWRN) Ltd PWS (Pollution and Waste Services) Sinbad Marine Services Ltd (SINBAD)

Methods

- In addition, meetings were held with key organisations in two stages:

Stage 1 Meetings:

Stakeholder	Representative	Venue	Date
Shannon Foynes Port Company/ Shannon Estuary Anti-Pollution Team	Capt. Hugh Conon (Deputy Harbour Master)	Harbour Office, Mill House, Foynes, County Limerick, V94R232	20 th November 2018
Irish Coast Guard	Dave McMyler	Department of Transport, Tourism and Sport, Leeson Lane, Dublin, D02TR60	23 rd November 2018



Stage 2 Meetings:

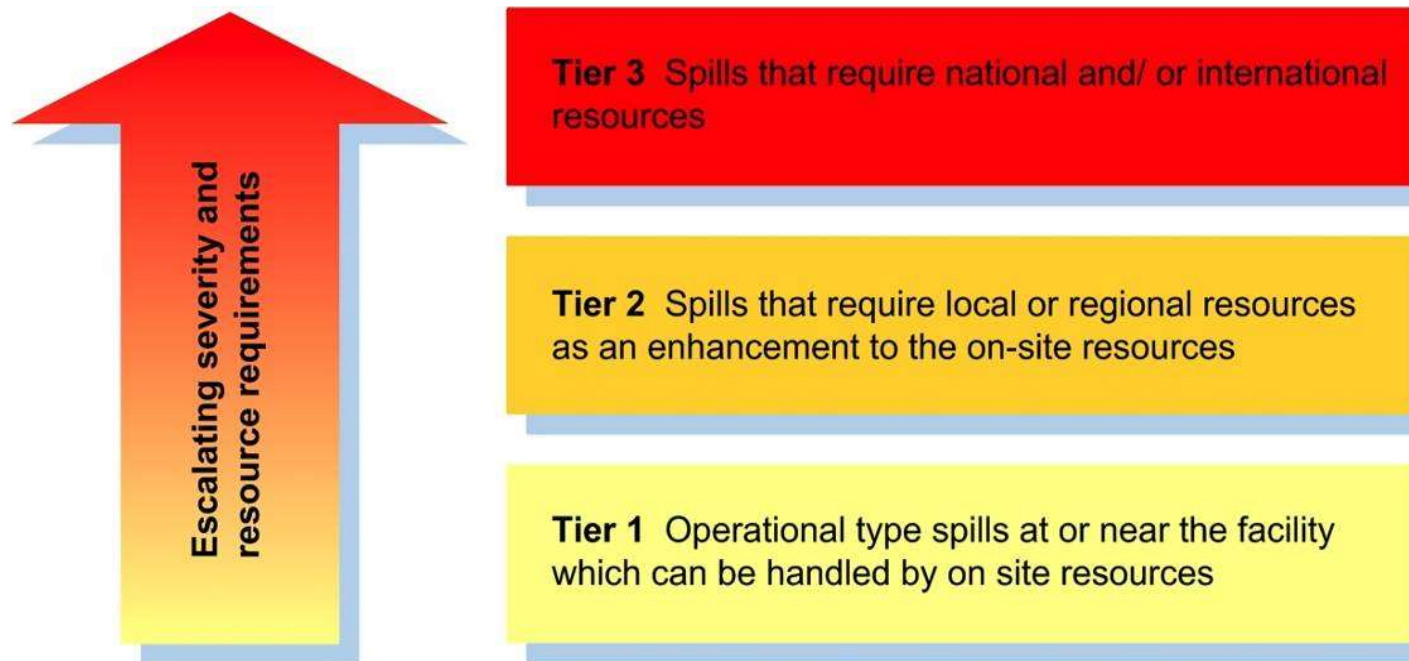
Stakeholder	Representative	Venue	Date
Irish Coast Guard	Dave McMyler	Department of Transport, Tourism and Sport, Leeson Lane, Dublin, D02TR60	21 st January 2019
Shannon Foynes Port Company/ Shannon Estuary Anti-Pollution Team	Capt. Hugh Conon (Deputy Harbour Master)	Harbour Office, Mill House, Foynes, County Limerick, V94R232	22 nd January 2019
Castletownbere Port	Declan Power (Assistant Harbour Master)	Castletownbere Fishery Harbour Centre, Castletownbere, Co. Cork	22 nd January 2019
Bantry Bay Port Company	Michael Pat Murphy (Harbour Master)	Wolfe Tone Square, Bantry, Co. Cork, Ireland	23 rd January 2019
Port of Cork Company	Nicholas Bourke (Deputy Harbour Master)	Cork Harbour Commissioners, Custom House Street, Cork, T12CY88	23 rd January 2019
Port of Waterford	Ian Moriarty (Deputy Harbour Master)	Port of Waterford, 3rd Floor, Marine Point, Belview Port, Waterford X91W0XW	24 th January 2019
Rosslare Port	Michael Proctor (Harbour Master)	Rosslare Port, Rosslare Harbour, Co Wexford	24 th January 2019

Key Oil Spill Response Concepts

- **International Convention on Oil Pollution Preparedness, Response and Co-operation: OPRC, 1990.**
 - Global framework for international cooperation.
 - Key international regulatory framework for oil spill preparedness and response.
 - Managed by the International Maritime Organization (IMO).
 - Ireland and benchmarking jurisdictions are Member States of OPRC 1990.
 - Requirement to establish measures for dealing with marine pollution incidents, either nationally or in co-operation with other countries.
- **OPRC national system to include:**
 - Designation of a competent national;
 - Designation of national operational contact point(s);
 - Designation of an authority to act on behalf of the Member State to request / render assistance;
 - A National Contingency Plan (NCP).

Key Oil Spill Response Concepts

- The tiered response concept



- Study's core focus was Tier 3, but also considered Tier 1 and 2 response where appropriate.

Key Oil Spill Response Concepts

- Key industry oil spill response options:

The Objective is to choose response strategies to:

- Minimise environmental and economic damage
- Promote recovery



Monitor and Evaluate



Containment and Recovery



Well Capping



Dispersants



Controlled (In-Situ) Burning



Shoreline Protection



Shoreline Clean-up

Study Findings

The study focused on 14 topic areas:

1. Spill Containment and Recovery Equipment and Resources;
2. Aerial Tracking and Surveillance Equipment;
3. Oil Pollution Response Vessels;
4. Oil Storage Equipment;
5. Shoreline Protection and Recovery Response Equipment;
6. Spill Sampling Procedures;
7. Dispersant Response;

8. Capping Stack Systems

9. Relied Well Planning

10. Incident Management;

11. Environmental Response to Marine Pollution Incidents

12. Shoreline Response Processes and Personnel;

13. Oiled Wildlife Response; and

14. Management of Volunteers

• 1: Spill Containment and Recovery Equipment and Resources

- Tier 1: Most port authorities (PAs) have a Tier 1 response capability in place, but most local authorities (LAs) do not.
- Tier 2: Most LAs and PAs do not have Tier 2 capability. Tier 2 measures in place for higher risk locations (e.g. SEA-PT, Whiddy Island).
- Tier 3: Tier 3 equipment available for national response through IRCG: Stockpiles in Blanchardstown, Castletownbere and Killybegs.
- LA's and PA's expect support from IRCG for Tier 1 or 2 assistance, however, IRCG does not have the resources to assist in this capacity.

Benchmarking	
State	Details
Australia	Maintains national Tier 3 equipment, positioned in 9 strategic coastal locations.
Denmark	National Tier 3 equipment stockpiles in 5 strategic locations.
Norway	27 oil spill response depots around the coast for Tier 2 / Tier 3 response.
UK	Tier 3 stockpiles in three strategic locations: Dundee, Bristol and Barnsley.

Key Recommendations
PAs to ensure that adequate Tier 1 and 2 resources are available to them, commensurate with the risk.
PAs and LAs to re-familiarise with the circumstances when the IRCG stockpiles can be authorised.
Organisations holding equipment (e.g. SEA-PT) to clarify to LAs and PAs the circumstances when resources can be accessed.
Consider establishing response organisation(s) (similar to SEA-PT) at strategic locations around the Irish coast to provide Tier 2.

- **2: Aerial Tracking and Surveillance Equipment:**

- Aerial surveillance through IRCG's associate membership with OSRL.
- Ireland does not have in-country dedicated aerial surveillance capability. Fixed wing aircraft from the Irish Air Corps. at Farranfore Airport, Co. Kerry, possibly available, although none are dedicated aerial surveillance aircraft.
- European Maritime Safety Agency (EMSA) has a capability for commercial UAVs - could be used for surveillance in inshore zones.

Benchmarking	
State	Details
Australia	Aerial surveillance services through Fixed Wing Aerial Dispersant Capability (FWADC) aircraft arrangements.
Denmark	Royal Danish Airforce carry out surveillance operations. Sundt Air perform regular airborne maritime surveillance using radar.
Norway	Norwegian Clean Seas Organisation (NOFO) helicopters for aerial surveillance.
UK	Dedicated aerial surveillance resources, via the MCA from two strategic UK locations.

Key Recommendations
OSRL aerial surveillance response times be periodically tested.
Detailed national study of aerial surveillance capability to be undertaken – if considering national capability.
Authorities to clearly define the expectations / requirements for aerial surveillance resources to offshore oil operators.

• 3. Oil Pollution Response Vessels:

- IRCG does not have Emergency Towing Vessel (ETV) contract, but does have agreements with some heavy tug owners.
- IRCG and SEA-PT jointly own Cataglop XLD oil and waste recovery boat, for inshore response operations.
- IRCG would call upon pollution recovery vessels through the EMSA network if necessary.

Benchmarking	
State	Details
Australia	No capability for oil pollution response vessels.
Denmark	7 oil spill response vessels and 3 storage barges. Agreements with Maersk and ESVAGT to provide recovery vessels and equipment.
Norway	Booms and skimmers on 9 Coast Guard vessels, plus 4 oil recovery vessels operated by the Norwegian Coastal Administration (NCA).
UK	1 ETV contract in place – located in Orkney. Agreements in place with tug owners through the Coastguard Agreement on Salvage and Towage (CAST).

Key Recommendations
Situation with regards to access to ETVs to be clarified.
Records of vessels and contractors to be kept and mechanism for mobilisation by IRCG to be clearly defined.

- **7: Dispersant Response:**

- Use is forbidden unless authorised by the IRCG.
- No existing dispersant stockpiles in Ireland and there are no in-country resources for vessel or aircraft dispersant application.
- IRCG has access to dispersant resources through associate membership with OSRL.

Benchmarking	
State	Details
Australia	Dispersant resources available: 10 dispersant stockpile locations and 6 aircraft locations.
Denmark	There are no existing dispersant capability. Generally not preferred.
Norway	Not preferred due to the nature of the coastline and the risk to fish farms. MOU in place with OSRL for access to dispersant resources should they be needed.
UK	MCA has dedicated stockpiles of dispersant and aerial dispersant spraying aircraft.

Key Recommendations
Situation with regards to dispersant use to be clarified within revised NCP.
Learning points from recent IRCG / OSRL dispersant exercise to be taken forward.
Further resources be allocated to IRCG to streamline the OSCP review and approval process.
Offshore operators to demonstrate full competence in dispersant application if they wish to use dispersant as a response strategy.

- **10: Incident Management:**

- NCP specifies arrangements for Tier 3 oil spill response management.
- The IRCG are the lead authority in the event of a national level response.
- Process of reporting and response activation defined within the NCP.

Benchmarking	
State	Details
Australia	Varies according to State/Territory but clearly defined. Operators must take lead but can request assistance from National Plan.
Denmark	The Danish Ministry of Defence is the lead authority for spill response at sea at the Tier 3 level. Clearly defined.
Norway	The NCA has a duty on behalf of the Norwegian government to maintain preparedness. Clearly defined.
UK	Tier 3 incident is national response by default; requires national resources coordinated by the MCA for a shipping incident, and operator for an offshore installation incident.

Key Recommendations

Consider a role within the Irish response framework similar to the SOSREP in the UK: Position has the powers to intervene in the interest of national security and environmental welfare.

- **12: Shoreline Response Processes and Personnel:**
 - Irish NCP recognises that civil contingencies are in place.
 - Enables LAs and Principal Emergency Services (PESs) to prepare for major emergencies.
 - NCP states LAs required to have their own contingency plans in place under OPRC 1990, and LAs have a responsibility for shoreline clean-up, regardless of the source of the pollution.

Benchmarking	
State	Details
Australia	Each State/ Territory has marine oil pollution response and consultation guidance notes, which define expectations.
Denmark	Responsibility for pollution incidents within ports and harbours and shoreline pollution response remains with local municipalities.
Norway	Regional committees exist to respond to pollution incidents, and each one has its own contingency plan.
UK	National jurisdictions are clearly defined within the UK NCP.

Key Recommendations
Roles and responsibilities of LAs within a national response to be clearly defined within the revised NCP.
Possible register of suitably trained personnel for assistance in a response of national significance.

Thank You -
Any questions?



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