GI WACAF PRELIMINARY COMMENTS ON "THE NATIONAL OIL SPILL CONTINGENCY PLAN OF SIERRA LEONE (JANUARY 2017)"

The GI WACAF has mandated Marcus Russell to review and assess the document "THE NATIONAL OIL SPILL CONTINGENCY PLAN of Sierra Leone (January 2017)", using the GI WACAF evaluation grid.

These comments presented in this document are provided at the request of the authorities (Mr. Duramani Kempes Sesay, Senior Environmental Manager, Sierra Leone Maritime Administration). They are only preliminary comments, based on a first review of the Plan and provided for information purpose to help identify area for improvement.

Disclaimer. The comments do not reflect the positions and do not imply the expression of any opinion whatsoever on the part of the IMO or IPIECA concerning the development of a national spill contingency plan for Sierra Leone.

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1 LIST OF ACRONYMS

CLC'92	Civil Liability Convention 1992
COP	Common Operating Picture
EPA	Environment Protection Agency
GI-WACAF	Global Initiative – West, Central and Southern Africa
IAP	Incident Action Plan
IMCT	Incident Management Command Team
IMS	Incident Management System
IMT	Incident Management Team
LSFO	Low Sulphur Fuel Oil
MFAIC	Ministry of Foreign Affairs and International Cooperation
NEBA	Net Environmental Benefit Analysis
NOSCP	National Oil Spill Contingency Plan
ONS	Office of National Security
OPRC	Oil Pollution Preparedness Response and Cooperation Convention
OSRO	Oil Spill Response Organisation
RP	Responsible Party
RRT	Rapid Response Team
SIMA	Spill Impact Mitigation Assessment
SLMA	Sierra Leone Maritime Administration
VLSFO	Very Low Sulphur Fuel Oil

2 TABLE OF FIGURES

3 CONTEXT & OBJECTIVES

The Sierra Leone Maritime Administration (SLMA), competent national authority, is entering a process of revising the National Oil Spill Contingency Plan (NOSCP). The national plan is at the core of its obligations to the international and regional oil spill preparedness conventions to which it is a signatory.

Last amended in 2017, this update is in preparation of offshore exploration activities resuming for the first time since 2012. In February 2024 Kempes Duramani Sesay, Global Initiative for Western, Central and Southern Africa (GI-WACAF) Focal Point for Sierra Leone requested support reviewing the current NOSCP for comments and inputs to help update and improve the revised document.

The review used the standardised evaluation tool provided by the GI-WACAF to appraise the plan for expected strategic and operational level content. A five tier scoring mechanism (absent / to be completed / minimum / good / optimum) is used to measure each criteria. A copy of the evaluation tool is provided in the annexe, this report provides a detailed summary of key observations and areas of potential improvements.

4 GENERAL OBSERVATIONS

Reflecting the importance placed on protecting its marine and coastal environments from oil spill risks, Sierra Leone has ratified key international and regional conventions. This includes Oil Pollution Preparedness Response and Cooperation 1990 (OPRC 90), Civil Liability Convention 1992 (CLC 92), Fund 1992 and International Convention on Civil Liability for Bunker Oil pollution Damage (Bunker).

For the government departments charged with maintaining the obligations associated with these conventions it is understood administrative and personnel changes have complicated the task. In real terms this has meant trained staff moving which has reduced knowledge levels and familiarity with the processes and procedures of the national response system. Budget constraints for training and exercises have added to the challenge. It will be important for the revised plan to be well socialised so post holders know their roles and the expectations of them. Incorporating previous lessons learned through exercising should be the starting point of the revision.

The following observations are generic in nature and relate to the strategic and operational components of the current plan.

4.1 STRATEGIC

4.1.1 TIERED PREPAREDNESS MODEL

The tiered preparedness and response model has evolved to a segmented circle representing a range of 15 response capabilities cascading through the tiers, underpinned by an effective Incident Management System (IMS) framework. The model helps planners consider specific response capabilities, emphasises the lack of rigid boundaries between tiers, and promotes the development of individually tailored capabilities corresponding to risk. Aligned with OPRC principles the approach builds preparedness and response capabilities to risks from shipping, oil handling facilities, ports and offshore installations

The 2017 NOSCP includes a lot but not all of the capabilities of the evolved model. Incorporating the model in the plan revision would be appropriate, illustrated by the recent development of a draft national dispersant use policy and intention to develop other policies regarding controlled in-situ burning and waste management.

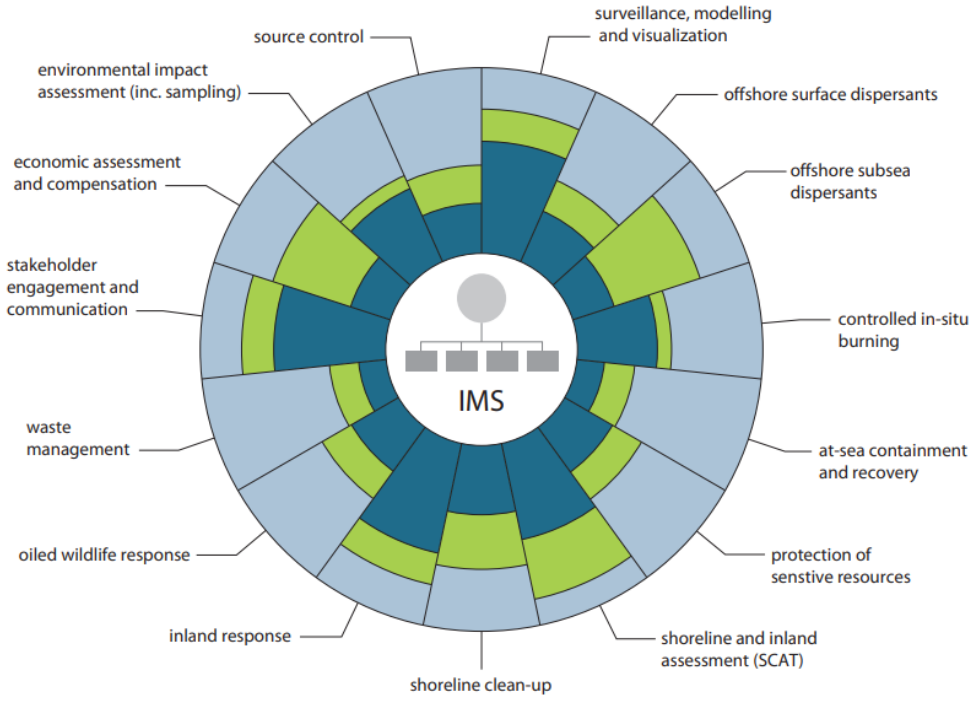

Figure 1 Evolved Tiered Preparedness and Response Model

4.1.2 INCIDENT MANGEMENT SYSTEM

The plan provides a good description of the spill management structure and key positions within it. However the use of some non-standard terminology (i.e. Crisis Manager, Rear Control Post Supervisor) and deviation from conventional incident management organisational roles introduces some uncertainty. For example the On-Scene Commander (OC) leads the response team with control of clean-up equipment, personnel and responsibility for operational effectiveness but it isn't clear how this role interfaces with the IMT. The revised plan should address this with a simple diagram to illustrate the relationship between the Incident Management Command Team (ICMT), Incident management Team (IMT) and Rapid Response Team (RRT), assuming the same structure remains.

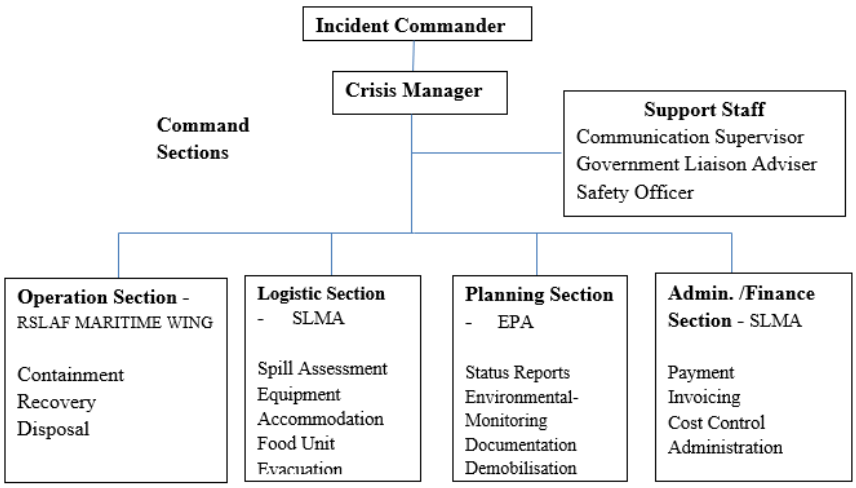

Figure 2 Sierra Leone Incident Management System Organisation Chart

A basic IMT schematic with key functions (Operations, Logistics, Planning, Finance and Command) is included but the accompanying narrative doesn't always align or reference the diagram. It is recommended to update the organisational chart complete with standardised naming for all positions and the function within which they sit. Action cards are worth considering for the IMT positions to more clearly define the responsibilities and actions of each role.

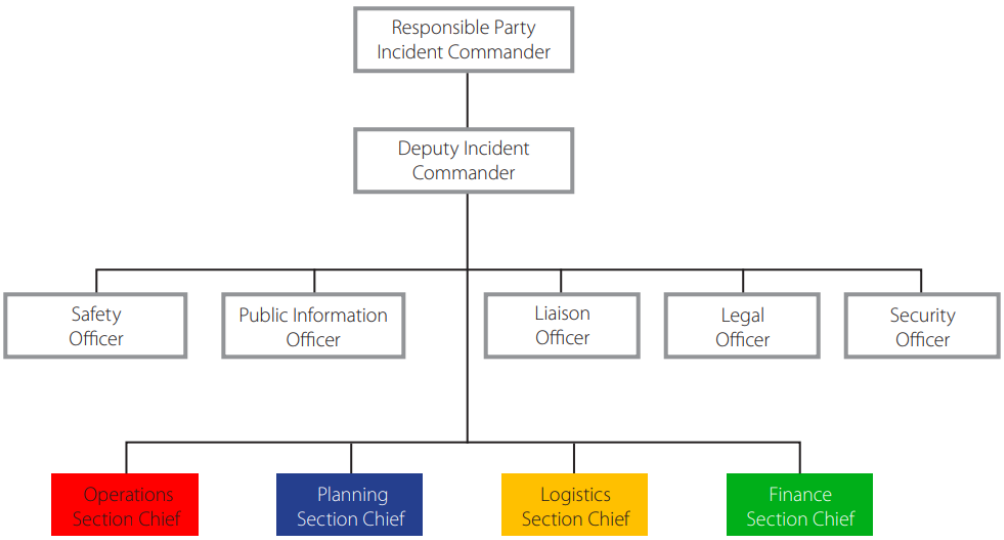

Figure 3 Generic Example of Standardised Incident Management System

Importantly there is currently no information on how the IMT interface with the responsible party, its management structure, and response decision-making processes. This should be a priority consideration when developing the revised plan, especially when engaging with international oil and gas operators performing offshore exploration activities.

4.2 OPERATIONAL

4.2.1 RESPONSE TECHNIQUES AND POLICIES

Natural dispersion is stated as the preferred response technique but rarely can it be used in isolation. Low recovery rates and heavy logistical support limit the efficiency of at sea containment & recovery, so the draft national dispersant use policy is a big step to enhancing response capability by broadening the range of available techniques.

A clear response policy will help deconflict response techniques, help manage simultaneous operations and improve efficiency such as encouraging the early use of dispersants, knowing when to stop and initiating other operations. The integration of techniques into an effective response plan relies heavily upon a robust surveillance capability to inform decision making.

Giving more detail on the aerial surveillance and remote monitoring capabilities is recommended considering its importance to creating an effective common operating picture (COP). This may include the specifications and mobilisation procedures of surveillance aircraft, remote sensing capabilities (infra-red, ultra violet, etc), and satellite surveillance contracts.

Figure 4 Example of Integrated Response Operations

4.2.2 RESPONSE RESOURCES

It is understood no dedicated oil spill response equipment is held by the government. A limited amount of specialist equipment is held by private oil handling companies. Vessels and aircraft for surveillance operations may be available from National Petroleum Sierra Leone and Ministry of Defence respectively.

In practice any response is highly likely to be resourced by industry, operators in the case of offshore exploration and international oil spill response organisations (OSRO) for shipping based incidents, or through offers of international assistance. Developing a national response capability is a capital and labour intensive activity for a statistically remote probability event.

The NOSCP revision must incorporate the new draft dispersant use policy plus any other policies that are under development (it is recommended waste management and wildlife response are prioritised). This will give clearer guidance on authorised response techniques and help establish resourcing levels for Tier 1 requirements.

5 SPECIFIC COMMENTS ON THE NOSCP

The following sections provide more detail of potential improvements which can be made to the strategic and operational components of the revised plan.

5.1 STRATEGIC

5.1.1 PLAN STRUCTURE

The plan is relatively clear in both its purpose and scope but it could be more succinct in its structure. Local and facility plans should be consistent and compliant with the national response plan but there is limited information on how it (the national plan) interfaces with other government plans or regional preparedness and response co-operation agreements (if any).

Strategic and operational content is mixed throughout the plan making it challenging to easily navigate and find information. There is no table of definitions or acronyms. Similarly a revision history table for the NOSCP is advised so the version number, date, revision description and person making the change is recorded. These issues can be relatively easily addressed by adopting a plan template which follows recognised good practice principles.

5.1.2 RISK ASSESSMENT

A list of probable causes is contained in the plan, although the relevance of some sources is uncertain, for example floating, production, storage and offloading when there is currently no production activities in Sierra Leones' waters. A number of events, the advent of low and very low sulphur fuel oils (LSFO / VLSFO), re-routing of vessel traffic from the Red Sea, and resumption of offshore exploration warrant a review of the spill risks to ensure the revised plan is still current.

In the case of low sulphur fuels, it is worth noting when spilt their behaviour is non-conventional when compared to traditional fuel oils, which is challenging established ways of thinking and methods of response.

5.2 OPERATIONAL

5.2.1 RECEIVING / INTEGRATING EXTERNAL ASSISTANCE

The lack of national response resources severely limits the ability to manage a large spill meaning support is highly likely to come from outside of Sierra Leone.

Regardless of source, it is important the processes for urgently requesting assistance are well documented understood by those responsible, in this case the Office of National Security (ONS) or SLMA through the Ministry of Foreign Affairs and International Cooperation (MFAIC). The arrangements and responsibilities for receiving and expediting customs clearance should also be documented, regularly tested, and linked to the NOSCP.

It is important requests for assistance are consistent with operational requirements and technically accurate (types, name, specification, quantity) to avoid the potential of mis-communication / mis-understanding by non-technical staff.

5.2.2 NEBA / SIMA

Encouragingly, reference is made throughout the plan to Net Environmental Benefit Analysis (NEBA) and Spill Impact Mitigation Assessment (SIMA). These processes are vital in helping decision makers justify response technique selections particularly when the views and interests of different stakeholders conflict..

It is unclear if the NEBA / SIMA process has already been conducted or not. If so, the outputs should be incorporated (or linked to the plan) to guide response managers on appropriate action in known sensitive areas. Due to the diverse interests and emotional nature of spills it is challenging to effectively perform NEBA / SIMA at the time of a spill. If not

already performed, engaging stakeholders is actively encouraged to gain consensus on the response strategy to be employed.

6 IMPROVEMENT AREAS

To help prioritise plan revision activities, the following are suggested as initial improvement areas upon which to focus efforts. Given in no order of preference, complexity, degree of effort or time required to address, individually and collectively each action will help to develop a more robust plan and in-turn effective spill response capability.

6.1 PRIORITIES

6.1.1 PLAN STRUCTURE

Improving the flow and order of information is important and would be helped by separating the strategic and operational content. Although not part of the review process, the current plan structure is a mix of data which could be made more user friendly. Despite largely containing all the expected information it is in no sequential order and is spread throughout the 68 pages, whilst in places more detail is required.

The use of good practice guides or other strategic or operational guidance (examples linked below) will help present information in a logical manner including detail of the national framework and requirements for reporting, assessing, responding and managing an incident.

Recommendations / Quick wins

- Use good practice guidance, e.g. from GI-WACAF, for concise and well-structured strategic and operational plan content..

NSCP_Guidance Doc_Ops_GI WACAF NSCP_Guidance Doc_Strat_GI WACAF

6.1.2 NOTIFICATION, REPORTING, AND ASSESSMENT

Timely reporting and receipt of spill notifications is crucial. The initial oil spill notification report included in appendix C, could be enhanced by adding the name of the receiving authority and details of the notification methods (i.e. telephone / email / fax, etc). The reporting requirements of vessel incidents is well documented but it is suggested instruction for offshore exploration activities is included.

Further guidance of any mandatory requirements such as method of notification, reporting timeframes should be given. A flow diagram of the reporting, assessment, and escalation procedure would remove ambiguity and further help install a more robust and reliable reporting system.

Recommendations / Quick wins

- Provide more information on initial notification reporting forms of the methods of communication and 24/7 contact details of appropriate authorities to inform of an oil spill.

6.1.3 INCIDENT MANAGEMENT TEAM (IMT)

A full review of the incident management organisation and the respective roles and responsibilities is encouraged. The present system loosely uses the IMT structure although with non-standard terminology and inconsistent functions. For example the roles of On-scene Commander, Marine Operations Superintendent and Containment, Recovery and Disposal Adviser do not map to the Command, Operations or Planning functions of standard incident command structure terminology. Standardising will help align with the systems used by international oil and gas operators.

As important as the incident management structure are the processes used to manage an incident and develop a response plan to mitigate adverse effects. The current plan is light in detail of the interaction between functions and decision-making practices. One example is the 'Planning P' a commonly used process that covers the initial response and subsequent longer term planning and management. The benefits of adopting the system would include standardised and resilient processes, although users need training in its features and use.

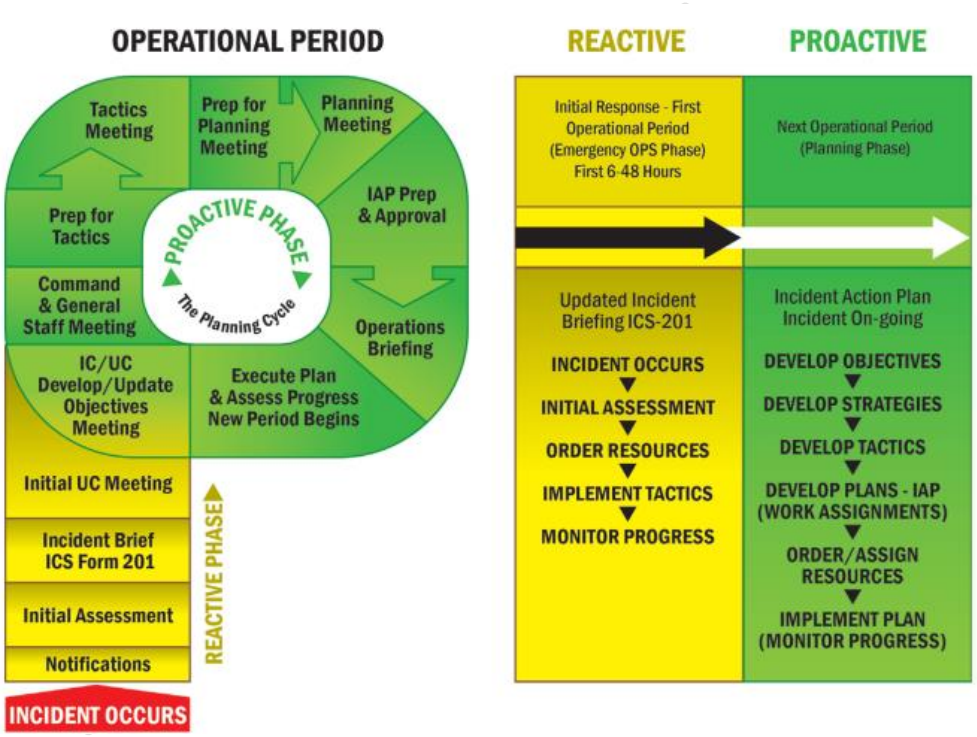

Figure 5 Operational Planning Cycle Process

IMT positions are emergency roles with post holders only able to practice during training, exercises or incidents. Skills fade is therefore a challenge, so to help individuals perform more effectively it is common within industry to use job aids, effectively a checklist of tasks and actions specific to IMT positions that help and support post holders. The use of job aids should be considered.

Finance Team Leader		
Leads the Finance Team. Responsible for all financial, administrative and cost analysis aspects of the incident.		✓
DOCUMENT	Begin Personal Log. **Refer to:** Appendix A, Forms	
SAFETY	Make safety the first priority.	
ALERT	Receive mobilisation of the Finance Team from the SRT Leader. Mobilise to the ERR or remain remote, as per the instructions from the SRT Leader (Restrata)	
ASSESS THE SPILL	Identify the financial requirements for ongoing and future response operations.	
COMMUNICATIONS	Receive initial incident brief from the SRT Leader.	
	Delegate tasks to the Finance Team.	
	Attend incident briefings with the SRT as required: • Verify financial and administrative requirements • Brief on administrative and financial status projections	
RESPONSE ACTIONS	Coordinate, lead and brief the Finance Team.	
	Assume responsibility for tasks assigned by the SRT Leader.	
	Review operational plans and provide alternatives where financially appropriate.	
	Manage all financial aspects of the incident.	
	Provide financial and cost analysis information as required.	
	Gather pertinent information from briefings with responsible authorities.	

Figure 6 Example Job Aid for Finance Section Chief

Recommendations / Quick wins

- Use a standardised incident management system to improve plan consistency, better define strategic/tactical roles and responsibilities and the process of incident action plan development.
- Individuals should have basic awareness of incident management principles and processes to give them the knowledge and confidence to perform their assigned positions.

6.1.4 INTERFACE WITH RESPONSIBLE PARTY AND TECHNICAL EXPERTS

Currently there is no detail on the interface and working relationship between Government and the Responsible Party (RP). This relationship will be crucial given external resources are likely to be mobilised by the RP whilst their response plan must meet with the approval of the lead agencies. Co-operation and agreement between the parties is therefore essential to reducing the risk of mis-communication and duplication of effort.

There are different models of how this may look in practice. Unified Command brings government (State and Federal if applicable) and the RP together as one IMT. Alternatives include embedding representatives from either government or industry into the others respective IMT to facilitate communication and information flow. Whatever the model it should be well prescribed in the NOSCP and ideally routinely exercised.

Recommendations / Quick wins

- Clearly define how engagement with any responsible party will be managed including primacy, communication expectations, accountabilities, joint decision making processes, and the physical process.

6.1.5 INTEGRATED RESPONSE PLAN

The likelihood is in major spills there will be simultaneous response operations taking place onshore and offshore (surface and subsea). The coordination required to combine these as an integrated response plan is a major undertaking requiring clear guidance.

The three tiers are central to the evolved tiered preparedness and response model which includes 15 specific elements of capability underpinned by a robust IMS. Whilst the reality is Sierra Leones threshold for resource provision is limited, a model of national capability would permit a more balanced, holistic evaluation of risk, resources and legislative requirements. It will also help develop a national position on the viability of capabilities such as subsea dispersant use and in-situ controlled burning. Where certain capabilities are not appropriate they are left blank.

Alternatively the RETOS tool helps operators and governments assess their level of planning and readiness management. The tool is quantitative and more detailed than the evolved tiered preparedness and response model which may be excessive for the present need of Sierra Leone.

6.1.6 PREPAREDNESS

It is essential the revised plan is rolled out to those undertaking the roles and responsibilities contained within it. In practice this will mean socialising the plan to familiarise users with its objectives, structure and any changes in content. As a minimum all post holders should also have received basic incident management training to be cognisant of IMT terminology and processes. Roles requiring specialist knowledge or skills should be filled by suitably qualified individuals and not on the basis of seniority.

Role specific and general training in the plans features will help build knowledge, confidence and competence in its use before attempting to fully test the plan. Exercise evaluation and feedback should be used to fine tune the plan with further updates. Skills fade remains a challenge which can only be overcome with a well-planned training and exercise programme. The current plan gives no detail of the required frequency of exercise.

Recommendations / Quick wins

- Appoint a core (small) group to lead the plan update with responsibility for completing assigned improvement areas. A Steering Committee would provide assurance for continuity and validation purposes.

7 SUMMARY & CONCLUSION

Sierra Leone is fully committed to meeting its obligations to the international and regional conventions to which it is signatory. Partly due to those commitments and the anticipated resumption of offshore oil and gas exploration the first revision of the NOSCP since its evolution from the 1994 Freetown Oil Spill Contingency Plan, is being undertaken.

The current plan is a solid foundation on which to build and the update provides the opportunity to reflect administrative changes and developments in spill response thinking and technology. It is also timely to re-assess changes to the national spill risk. Offshore exploration is a major consideration but world events forcing the re-routing of global marine traffic past Sierra Leones territorial waters and the advent of low sulphur fuels also contribute to a changing risk profile.

Whilst addressing all points raised in the review may not be realistic or necessary the observations and suggested improvement areas are intended to promote the adoption of recognised good practice, develop a more robust, functional plan, and improve user friendliness.

8 APPENDICES

8.1 COMMENTS ON THE DOCUMENT "THE NATIONAL OIL SPILL CONTINGENCY PLAN OF SIERRA LEONE

absent / deficient / inadapted	0.2
to be completed	1
minimum correct	2
good	3
optimum	4

NSCP STRATEGIC LEVEL ITEMS

Note. Items do not reflect the structure but the expected contents.

Expected items	Score	Eval.	Comments
INTRODUCTION	**1.4**		
- Background information (geography, boundaries, administrative & territorial organisation)		2	1. Appropriate level of information on the geography, boundaries, administrative and territorial organisation is given in the Policy Statement and Introduction. 2. More detail on the NSCP history and development could be included.
- Objective, scope (geographical, products, types of incident)	2.0	2	1. Geographic scope of NSCP clearly explained with aid of map and text. 2.Summary of generic spill risks and oil types are listed in section 3 (Preparedness) but could be more specific to the exact operations and oil types handled within the Sierra Leone maritime boundaries. 3. There is no reference to the NSCP applying to Hazardous and Noxious Substance (HNS) response, any exemptions or scenarios / incidents not covered by the NSCP should be clearly stated. 4. The definition given of tiered preparedness and response uses the original conventional model which has since evolved to the concentric, segmented circle model. 5. The updated NSCP should reflect any elevation in spill risk due to recent oil exploration licensing rounds and the intention to develop the national industry. There may also be a perceived increase in the risk from passing ships given changes in vessel routings to avoid the Red Sea.
- Definitions & abbreviations	0.2	0.2	1. No table of abbreviations and definitions given, consideration should also be given to including a record of NSCP updates / amendments.
APPLICABLE REGULATIONS	**2.0**		

- International conventions (IMO: Preparedness - response - cooperation - compensation, Basel, others)	2	1. Relevant international conventions to which Sierra Leone is party are listed in Section 1 (Introduction) but needs updating to reflect ratification of the Bunker Convention. 2. There is a more general lack of information on how the relevant conventions apply to the NSCP, this information could be given in table format
- Regional conventions (Bamako, others)	2	1. Ratification of Abidjan convention listed, more detail on its application in the context of the NSCP and any legislation should be considered. 2. Updated NSCP to include ratification of Bamako Convention and any relevant national legislation. 3. There is no reference to any regional co-operation / joint response plans.
- National regulations for incident/ disaster management	2	1. Sierra Leone laws applicable to marine environment protection are given in table1 (Section 1.2,Scope)
KEY ROLES & RESPONSIBILITIES FOR PREPAREDNESS	**1.4**	
- Key national competent authorities for preparedness + Authority in charge of NSCP	2	1. The introductory Policy Statement clearly assigns oil spill prevention and control to the Disaster Management Department of the Office of National Security, Sierra Leone Maritime Administration as Lead Agency and the Republic of Sierra Leone Armed Forces (Maritime Wing) as primary Response Agency.
- High level / inter-ministerial committee for preparedness supervision	1	1. Oil spill prevention and control rests with the Disaster Management Department, oil and gas operators submit their oil spill contingency plans to the Petroleum Directorate, oil terminal and bunker operators plans are approved by the Sierra Leone Maritime Administration. No detail is given of any process or co-ordination / co-operation between the respective ministries.
- Technical group/ committee for the coordination of preparedness activities	1	1. Reference is made to the National Oil Spill Contingency Planning Committee (section 3.4) for managing tier 2/3 incidents although no detail is provided on its make-up or responsibilities. 2. The OPRC training and exercise requirements is quoted together with a description of different exercise types is given but detail in the context of Sierra Leone is missing i.e. any regulatory requirements regarding, frequency, participants, etc
- Responsibilities of other ministries, agencies, administrations etc.	2	1. General responsibilities of Government ministries are given albeit it dispersed through different sections. Consolidating to one section would provide more clarity. 2. The information could be presented in diagram / chart format. 3. Section 2.4 refers to generic interagency agreements but no detail of any existing agreements between relevant Ministries, Departments or Agencies is given.

- Responsibilities of ports, shipping, O&G, HNS industry & other private sector	1	1. Operators requirements to have their own plans (reviewed 2 yearly) and the ability to manage their own tier 1 and tier 2 response capabilities is included. There is no reference to any exercise requirements or regulatory participation / approval.
SPILL RISK ASSESSMENT **1.4**		
- MetOcean conditions relevant for spill response	2	1. Details of wind speed and direction (2000 - 2005) average rainfall and temperature are Included within Appendix D. This information can be updated with a more current / larger data set. 2. Wind data could be more clearly illustrated using wind rose 3. No information of the ocean currents or sea state are given.
- Main types of oil & probable fate of oil	1	1. Included within the Risk Assessment (3.3.2) is a diverse range of oil types with potential to be spilt within Sierra Leones waters, said to have been identified from an oil spill assessment . No further information (participants, date, methodology, findings) on the assessment process or details of the operations linked with oil type are provided. 2. A review of the assessment would be prudent to verify relevance and identify any changes to the national risk profile, e.g. to include the introduction of low and ultra-low sulphur fuel oils, new / obsolete oil handling facilities. 3. A brief generic description on the fate of spilled oil in the marine environment is given but there is no specific details on the consequence in terms of Sierra Leone specifically.
- Main sources of spill/ danger & groups of spill scenarios	1	1. Section 3.4 identifies a range of oil spill scenarios although no details are given of the process used to arrive at the results. The relevance to Sierra Leones current risk profile is unclear as releases from FPSO and pipeline failures are referenced. 2. The planned increase in oil and gas exploration activity would elevate the potential spill risk and merit a review of the possible spill scenarios. 3. No Risk Assessment Matrix
- Main risks for Health & Safety	1	1. Generic health and safety considerations are recorded in section 4.1. There is no reference to the systems or processes that will be applied to eliminate / mitigate perceived risks. 2. No detail is given on the suitable qualifications for the IMT Safety Advisor position which is resourced from SLMA. According to the plan he/she will be responsible for providing expertise on the safe practices followed.

- Sensitive environments & priorities (protection/ clean-up)	2	1. Detailed information of Sierra Leones marine and coastal biodiversity is included in Appendix I but does not appear to include sensitivity maps (missing from Annex 1). 2. Protection / response priorities are described in general terms (fishing, sandy beaches, swamp farms, shell fish production, spawning grounds and mangrove swamp) without detailing specifics. It would be prudent to review the merit of these resources to verify their relevance. 3. There is no reference to a NEBA / SIMA process having been applied to prioritise sensitivities for protection / cleaning 4. No reference to the Sierra Leone River Estuary Ramsar site.

RESPONSE TECHNICS & POLICIES	**0.8**		
- Spill response technics allowed/ recommended/ regulated at sea & on land		1	1. Containment and recovery and manual clean-up are stated as the preferred response techniques. Dispersants can only be used with written approval from the EPA. The process of gaining approval is not included. 2. A review of the preferred response techniques would be timely to confirm they are capable of being adequately resourced and delivering the desired mitigation results. 3. Generic response techniques are described but does include specifics in the context of Sierra Leone.
- National Policy for Dispersant Use		1	1. Section 5.7 states there is no dispersant policy. Reference is made to a policy being attached in the Annex which is missing.
- National Policy for In Situ Burning, use of other products		1	1. Section 5.7 states there is no in-situ burning policy. Reference is made to a policy being attached in the Annex which is missing.
- National Policy for Spill Waste management		1	1. Section 5.6 states a waste management policy as being attached in the Annex which is missing.
- National Policy for Oiled wildlife management		0.2	1. No detail of a national policy or response capability given, the plan states the Incident Management Team (IMT) position of Environmental Advisor has responsibility for wildlife protection and rehabilitation (a responsibility shared with the Conservation Society (section 6.1)). .
RESPONSE RESOURCES	1.3		
- Types of resources (Personnel - Equipment - Logistical support)		1	1. Basic overview of response equipment fundamentals is given in Appendix E, however the inventory of locally available resources contains no information, presumably there is no equipment at the disposal of the national authorities. 2. Appendix E recommends 1000 mtrs of boom for tier 2 response capability, no rationale for the assumption is provided, nor does it follow any good practice principles. 3. The IMT organisation chart includes a Logistics Section but no further details are given in the plan such as roles, responsibilities, resources, etc. 4. Lack of response equipment (dispersant and spray equipment, boom, skimmers, storage) for a national response capability. 5. Aerial surveillance not included in response techniques. National capability not stated.
- Consideration on facilities		2	1. General description given of the facilities available at JMC Murray Town Operations Centre. Would benefit from more detail such as methods of communication available (VHF, UHF, Inmarsat, etc), capacity for IMCT members, information displays, IT resources, etc. 2. No details of facilities at Forward and Rear Control Posts or Field Command Post vessel, beyond VHF/HR radio.
- Consideration on accessible assistance		1	1. No detail given of the assistance available through the interagency agreements referred to in section 2.4. 2. External support is referenced in several sections although no detail of any agreements, resources or activation procedures are given. 3. No information given of any organisations or arrangements to access international assistance other than diplomatic channels being opened through the Ministry of Foreign Affairs and International Co-operation.

COST RECOVERY & CLAIMS FOR COMPENSATION	1.7		
- Applicable framework for the different types of incident (shipping, other at sea, on land etc.)		2	1. Ratified international compensation conventions (CLC92 and IOPC Fund) for pollution from ships are listed (6.3.5) the Bunker Convention needs adding. 2. Cost recovery arrangements in the event of pollution from offshore exploration / production activities are not addressed .
- Specific framework for claims in case of shipping incidents		1	1. Responsibility for maintaining accurate financial records rests with the incident management team, no detail of the processes, procedures or documentation to be used is given. 2. Appendix K expands on the international compensation conventions (including bunker convention which isn't included within the main body of the plan), referencing the appendix K in the plan is recommended.. 2. Would benefit from more detail on the mechanics of engaging with the P&I Clubs and/or itopf for claims handling and restoration projects (6.1)
- Specific framework for claims in case of other incidents		2	1. Appendix K states there is provision for operators to have appropriate liability coverage for pollution from offshore installations. Details of the cover and assurance process aren't included. Hyperlinks to the appendix within the relevant part of the plan are recommended.

PREPAREDNESS ACTIVITIES	**0.8**		
- Designation of personnel		1	1. Key response roles appear to be assigned by positions in relevant ministries. It doesn't elaborate on suitability, qualification / training, expertise or experience / competency requirements for the roles.
- Arrangements for ports, private sector, O&G industry		1	1. No detail of any mandatory exercise or training requirements for operators to fulfil. Plans are approved by the SLMA every 2 years but no testing requirement of tier 1, 2 or 3 response capabilities.
- National training & exercise policy		1	1. Missing detail of any national exercise programme i.e. type, frequency, duration. 2. No detail given other than a continuous training programme (3.11.2). Consider including a training matrix for key response positions defining the need, level and period of validity.
- NSCP management (update, validation, approval, dissemination etc.)		0.2	1. No information given of NSCP update frequency or consultation process.

NSCP OPERATIONAL LEVEL ITEMS

Note. Items do not reflect the structure but the expected contents.

Expected items	Score	Eval.	Comments
INTRODUCTION	**1.7**		
- Objective, scope (geographical, products, types of incidents)		2	1. Covered in introduction of NSCP strategic section.
- Overview of incident levels + Activation of NSCP + Initial responsibilities for alert & 1st response		2	1. Tiered response principles are correctly referred to in terms of capability and not volume. The mechanism for activating the NSCP could be clearer, detail is lacking of the initial assessment process and establishing level of response prior to escalation to the IMCT. 2. Vessel spill reporting responsibilities are clearly explained, the same level detail is lacking for ports, oil handling facilities, and oil exploration activities.
- Relation/ interface with other National contingency plans and incident management frameworks		1	1. Other applicable national policies are listed (section 1.3) but would benefit from more detail on the implications for the NSCP, in particular the integration and management frameworks.
KEY ROLES & RESPONSIBILITIES FOR RESPONSE	**1.3**		
- Key national competent authorities for response (high level committee, National Incident Commander/ Coordinator, Lead Agencies, Alert reception contact points, authority to request/ render assistance…))		2	1. Comprehensive explanation given of the Government agencies and departments filling roles and certain key positions within the NSCP command and response functions.
- Responsibilities of other ministries, agencies, administrations etc.		1	1. Responsibilities of other Government agencies are described throughout the plan, for ease of use these could be consolidated within the the plan.
- Responsibilities of Responsible Party, of P&I club (for shipping incidents) etc.		1	1. Missing detail on the expectation of responsible parties to manage spill incidents and the role of Government (in particular who has primacy). 2. Missing detail of the mechanism for monitoring a spillers response management and any thresholds for augmenting or taking over control.

NATIONAL INCIDENT COORDINATION STRUCTURE	**1.7**		
- Structure of National spill management from local to national level, consistent with territorial & administrative country organisation, allowing an escalating mobilisation (facility, local, province/ sub-national, state, national/ federal, regional/ international) & adaptable to the different incident type, location & size + Description of key roles at each level		2	1. There is a clear, scalable, management structure however detail is lacking of how smaller incidents (e.g. harbour spills) would be monitored and escalated to activate the NSCP if needed. 2. IMT Position checklists would help staff who may be less familiar with the duties expected of them perform their roles. 3. make reference to the importance of maintaining personal logs to record date, time and outcomes of telephone calls, meetings, decision making, etc. Consider including a template in the appendix.
- Integration / interface with local plans, sectorial plans, O&G plans + Responsible Party & Assistance		1	1. Missing detail on the integration (organisation, primacy, decision making, etc.) of Government and responsible party incident management teams
- Use of a robust Incident Management Structure at national level scalable (incident size) & flexible & modular (incident type & location) + Description of functions in the national incident management team(s)		2	1. Some non-conventional terminology is used with the Incident Management System (IMS) i.e Incident Management Command Team, Crisis Manager, Rear Control Post, Deputy On-scene Commander. 2. Conventional roles would include Section Chiefs for Operations, Planning, Logistics and Finance. The IMT roles described in the NSCP do not appear to relate to the diagram (section 2.6). 3. There is no detail on the co-ordination and information flow between the Operations Centre, Rear Control Post and forward Control Post.
ALERT, ASSESSMENT & MOBILISATION	**1.3**		
- Alert mechanisms & reception points for all types of incidents		2	1. Missing information of spill notification points (relevant agency, location, contact details, 24/7 operations). Consider including relevant phone numbers, email addresses, fax numbers, etc to initial oil spill notification report.
- Immediate actions, evaluation		1	1. No detail of the initial evaluation process at the point of notification (SLMA) or the criteria to support decision making, determine severity and the need for escalation.
- Mobilisation & NSCP activation		2	1. Clearly stated as being a responsibility of the Incident Commander.
- External alert & notification + Transboundary		0.2	1. No information given of any international or external notification procedures
INCIDENT MANAGEMENT PROCESS & RESPONSE	1.0		
- Use of robust Incident Management processes based on logical steps (situation,		1	1. No clear description of methods and processes used by the IMT to develop, execute and review the action plans to meet the set objectives. 2. There are no records (templates) to capture and disseminate the response priorities and objectives set

evaluation, predictions, impacts, priority objectives, strategy, tactics, resources needed)		by the Incident Commander. 3. Good practice uses the principle of the planning P to plan, brief, execute and assess the response. 4. The plan differentiates between persistent and non-persistent oils. Response techniques and strategy may vary but it's recommended for planning purposes they are treated the same.
- Mechanisms to implement the Intervention Plan	1	1. Overarching principles of mobilising resources and personnel are described, however there is little detail on the supporting logistics and how this would be achieved.
- Mechanisms for transboundary management	0.2	1. No detail of any mechanisms that may be in place for management of transboundary issues
- Management of information & regular reporting (internal & external)	1	1. Basic information reporting is covered but would benefit from further guidance on the timing and dissemination of information. 2. Using standardised templates would assist with consistency of reporting for larger incidents.
- Rotation of personnel	2	1. The Incident Commander decides the working shift patterns based on the size and nature of the spill. It is likely the initial information will be inadequate to make this decision and doesn't follow good practice principles 2. Work patterns for command staff are based on a 24, 48 or 72 hour operation, comprising of 12 or 8 hour shifts. Should prolonged operations (weeks / months) be required detail is missing how the positions will be resourced. 3. For larger incidents more positions than those listed in 4.3.1 would be necessary to manage / support higher numbers of field operatives. Planning activities require less staff on the night shift. 4. For large incidents consider setting a maximum working period for personnel rotation i.e. 14 or 21 days to manage the risk of fatigue.

MOBILISATION OF EXTERNAL ASSISTANCE	**0.5**		
- Mechanisms to request, review, accept & mobilize external assistance (country, international)		1	1. No detail of any regional agreements, cross boundary cooperation or contracts with international oil spill response organisations, beyond the Ministry of Foreign Affairs and International Co-operation managing requests for international assistance.
- Mechanisms to expedite assistance arrival (Customs, Immigration, reception etc.)		0.2	1. No detail given.
- Mechanisms to manage assistance (staging, transport/ transfer to sites etc.)		0.2	1. No detail given.
COST RECOVERY & CLAIMS FOR COMPENSATION	**1.0**		
- Mechanisms for cost recovery		1	1. General details given but would benefit from more guidance such as admissible costs, examples of proof of expenditure, record keeping templates, etc
- Mechanisms for insurance issues		1	1. General details given but would benefit from more guidance such as admissible costs, examples of proof of expenditure, record keeping templates, etc
- Mechanisms for claims for compensation		1	1. Defined for shipping incidents CLC92, Fund and Bunker Convention.
CRISIS MANAGEMENT	**1.1**		
- Overall mechanisms for crisis management		0.2	1. No details of the process, trigger points or structure of escalating to crisis management.
- Media communication		2	1. Adequately covered in section 5.11 and appendix J
- Communication to public		2	1. Adequately covered in section 5.11 and appendix J
- Continuity of activities		0.2	1. No detail given.
RESPONSE TERMINATION & POST-SPILL ACTIVITIES	**1.0**		
- Response termination & Demobilization mechanisms		1	1. The decision to terminate clean-up operations is the responsibility of the Incident Commander. No detail is provided of termination criteria or any baseline information to support decision making. Stakeholders who will be consulted in the decision to terminate aren't prescribed.

- Mechanisms for evaluation, feedback & improvement	1	1. Casualty investigations are listed as being performed to improve safety measures (prevention). Post incident reports produced by support agencies are submitted within 1 week to the IC and ultimately the State House. Elaborate to explain how the information is used, i.e. identifying lessons learned to improve the plan, incident management processes, training requirements, etc. A process for capturing feedback following spills and exercises to drive continual improvement should be identified.
- Mechanisms for damage assessment (environment, activities etc.)	1	1. General overview described in section 6.1.
- Mechanisms for environmental monitoring & restoration	1	1. Restoration requirements are determined by MLCPE and EPA using appropriate local or internationally accepted standards. Consider providing deeper information of the exact standards / process to be used .

NSCP APPENDICES & OTHER ITEMS

	Score		Expected items
National spill sensitivity atlas	0.2	0.2	Referenced as created / owned by EPA but not included within annexe of NSCP
Main types of hydrocarbons products, and spill scenarios	1.0	1	Generic oil types described as part of risk assessment. No context provided as to oil handling operations, volumes handled, etc
Main spill scenarios	1.0		Generic scenarios described but relevance undetermined, e.g reference to FPSO when there is no production
Forms (alert - POLREP, situation report - SITREP, assistance, survey etc.)	1.0	1	Present but missing vital information such as contact details of notification point
Emergency contact lists	1.0	1	Present but incomplete. To be fully updated as part of revision
Inventory of competent personnel, equipment, logistical support for response	0.2	1	Incomplete
Operational instructions: Aerial surveillance, sampling, spraying, recovery, shoreline survey,	0.2		Not included

protection, clean-up, waste management etc.		
Claims handling and compensation mechanisms, etc.	0.2	High level description of framework but requires further detail.