

LOCAL COASTAL POLLUTION TIER 1 INCIDENT PLAN

Version 1

DATE: November 2019

DEVELOPMENT OF PLAN AND AMENDMENTS

This plan has been developed by Newport City Council's Civil Contingency Unit (CCU). It will be reviewed every 3 years. To ensure the validity of this plan is maintained, Plan holders are requested to inform the CCU of any amendments to the information presented in the Plan by writing to:

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DISTRIBUTION LIST

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Heddlu Gwent Police

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1 INTRODUCTION

- 1.1 Newport City Council's Local Coastal Pollution Tier 1 Incident Plan has been produced in line with the guidance provided in the Maritime and Coastguard Agency (MCA) National Contingency Plan for Responses to Marine Pollution from Shipping and Offshore Installations 2015.
- 1.2 This plan addresses the shoreline assessment and clean-up operational procedures to be followed in the event of a pollution incident from Oil, Inert, Hazardous and/or Noxious Substances (HNS). This includes any substance that is liable to create hazards to human health, harm to living resources and marine life, to damage amenities or to interfere with other legitimate uses of the coastline.
- 1.3 An emergency in this context is defined as an event or situation that threatens damage to the environment, involving contamination of land and/or water and/or air with chemical matter or the disruption or destruction of plant and animal life.

2 AIM

2.1 The aim of this Plan is to co-ordinate an effective and timely response at local level, to a Tier 1 shoreline coastal pollution incident.

3 SCOPE

- 3.1 This plan not only aims to set out a response to oil pollution events that have the potential to threaten public health as well as the coastline of Newport, but also to set out response procedures to the risk of inert, hazardous and noxious substances as stated in the scope of the National Contingency Plan to marine pollution.
- This plan is concerned with the NCC's response to Tier 1 incidents only. The response to Tier 2 incidents will be covered by the Gwent Major Incidents Response Arrangements (GMIRA) within the Gwent Local Resilience Forum (GLRF). The response to a Tier 3 incident will be in line with arrangements detailed in the MCA's National Contingency Plan.

The MCA or Bristol Channel Environment Group (BCEG) are likely to determine the extent (i.e. Tier 1, 2 or 3) of each incident, which will influence the response required. Tier definitions are explained on page 5.

3.3 Due to the different tiers of incidents that are possible, the responses to each tier can be escalated and de-escalated when appropriate due to working relationships and integrated response procedures between those organisations involved in response to marine pollution events.

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Tier	Definition	Response
Tier 1	Small background and minor operational spills, resulting in shoreline pollution, which can be wholly dealt with by the relevant local authority or harbour authority.	Local Local authority, offshore installation operator, harbour authority
Tier 2	Specific small-scale incidents e.g. ship operational discharges where local authorities may require assistance to initiate and maintain a shoreline response.	Regional Local authorities, County council, Harbour authorities
Tier 3	A large spill where Government support may be necessary. A Tier 3 incident will be beyond the capabilities of local and regional resources. Such an incident will, through the implementation of the National Contingency Plan be subject to Government controls. It is likely that a Shoreline Response Centre will be set up.	National Local and County councils. Harbour authorities Maritime and Coastguard Agency

4 THE SEVERN ESTRUARY

- 4.1 The Severn estuary has the second largest tidal range in the world, often exceeding 12 metres at Newport all year round. This along with the funnel shape of the estuary results in strong tidal streams causing high levels of turbidity. The high tidal currents can potentially move any pollutant or floating debris rapidly over a wide area. The tidal range also influences the vertical extent of the foreshore at risk of impact.
- 4.2 The large tidal range results in the estuary having one of the most extensive intertidal wildlife habitats in the UK, comprising of mudflats, sandflats, rock platforms and islands. These features form a basis for plant and animal communities typical of extreme physical conditions of liquid-mud and tide-swept sand and rock. The estuary is recognised as a wetland area of international importance and is designated as a Ramsar site, a Special Protection Area (SPA) and a Special Area of Conservation (SAC).
- 4.3 Parts of the estuary have also been designated a Site of Special Scientific Interest (SSSI) under the Wildlife and Countryside Act 1981. The coast of

Newport is included within the SSSI. It has also been designated as a RAMSAR, a Special Protection Area (SPA) and a Special Area of Conservation (SAC) - refer to Appendix C.

5 ROLES AND RESPONSIBILITIES

In the UK, the responsibility for dealing with pollution from shipping lies with the MCA. Additionally, certain ports and harbours are required to have the capability to respond to a Tier 2 incident in their area of jurisdiction. The responsibility for leading with marine pollution from land based sources lies with the environmental regulator (Natural Resources Wales).

5.1 THE MARITIME COASTGUARD AGENCY (MCA)

5.1.1 The MCA is responsible for responding to maritime emergencies 24 hours a day and when pollution occurs at sea, for minimising the impact on UK interests.

The MCA can be contacted for any routine operations in the Newport coastline area. The number to contact them directly with such requests is accessible within the Gwent LRF contacts directory. Alternatively, they can be contacted via 999 by asking for the coastguard.

- 5.1.2 The MCA is an Executive Agency of the Department for Transport, which includes HM Coastguard. The Counter Pollution & Response Branch responds to oil and chemical spills. It assesses reports of marine pollution and takes any necessary action.
- 5.1.3 The MCA also provides scientific and technical advice on shoreline clean ups to local authorities and can access stockpiles of equipment to assist in shoreline clean ups.
- 5.1.4 Further details are provided within supporting documents known as Scientific, Technical and Operational (STOp) advice notes.
 - STOp 4/09 Guidelines for the Preparation of Coastal and Estuarine Booming Plans
 - **STOp 1/16 –** Response and Recovery to a Maritime Pollution Incident Impacting the UK Shoreline
 - **STOp 2/16** Maritime Pollution Response in the UK: The Environment Group
 - STOp 3/16 Waste Management Guidance Following a Maritime Pollution Incident in the UK
 - STOp 1/18 Mineral and Vegetable Oil Pollution Guidance for Shoreline Response

These advice notes can be accessed on: https://www.gov.uk/government/publications/scientific-technical-and-operational-advice-notes-stop-notes

- 5.1.5 Regional Principal Counter Pollution and Salvage Officers are responsible for dealing with pollution incidents in their areas.
- 5.1.6 MCA Counter Pollution staff are available, free of charge, for scientific/technical advice on the efficiency and application of available cleanup techniques to be used by local authorities during the response efforts in Tier 1 and Tier 2 incidents. If necessary, the MCA can also hire out items of specialised equipment from their shoreline clean-up stockpile to Newport City Council.
- 5.1.7 If a Tier 3 incident was to occur, it is almost certain that multiple Local Authority coastlines would be affected. The MCA have a finite amount of resources and would therefore look to direct these to the area(s) with the greatest need.
- 5.1.8 The MCA arranges Central Government response to pollution at sea and coordinates the on-shore arrangement for major incidents when the effects are beyond the capabilities of maritime local authorities. The MCA:
 - Maintains a stockpile of "at sea" and "on-shore" pollution response equipment;
 - Provides technical/scientific advice:
 - Funds research and development into new techniques;
 - Provides training courses for local authority personnel;
 - Administers central Government compensation claims.

5.2 HEDDLU GWENT POLICE

- 5.2.1 Gwent Police have the overall primacy at the scene (on land) of a hazardous materials incident in order that public health can be safeguarded. However, due to legislative responsibilities and respective areas of expertise, other agencies may take lead in specific areas of the response.
 - For example, in most cases, the agency with responsibility for mitigating the emergency effects may be the Fire and Rescue Service.
- 5.2.2 Gwent Police will maintain cordons and lead in traffic management to prevent vehicle and pedestrian access to the affected areas of the shoreline.
- 5.2.3 Gwent Police will organise an initial meeting at the scene with the Fire and Ambulance service to assess the situation and decide on actions before involving other agencies.

5.2.4 Where hazardous substances on the shoreline pose a significant threat to life (i.e. explosive), Gwent Police will take primacy at the on-scene response to ensure safety of the public and responders.

5.3 SOUTH WALES FIRE AND RESCUE SERVICE (SWFRS)

- 5.3.1 The role of SWFRS is to undertake their duties of fire fighting and prevention, and rescue operations in order to save life with their established procedures.
- 5.3.2 Specialist appliances can be mobilised to provide specialist equipment and assistance and is given in more detail in section 8.2. SWRFS can also deploy Hazmat Officers who have specialist training in hazardous materials.

5.4 WELSH AMBULANCE SERVICE TRUST (WAST)

- 5.4.1 WAST will mobilise personnel and resources, including personnel with personal protective equipment, to deal with and manage the medical needs of casualties.
- 5.4.2 WAST will provide appropriate medical intervention at the scene and transport casualties if required. WAST personnel can also liaise with hospitals and specialist NHS advice centres.

5.5 NEWPORT CITY COUNCIL

- 5.5.1 The Civil Contingencies Act 2004 places a duty on Category 1 Responders which includes the Local Authority amongst other emergency responding organisations to prevent an emergency, and reduce, control or mitigate its effects.
 - Oil pollution, along with the contamination of the estuary with inert or hazardous and noxious substances would classify as an emergency in such terms.
- 5.5.2 Within the MCA National Contingency Plan, local authorities are responsible for:
 - The co-ordination of the clearance of pollutants from their respective coastline including land exposed by falling tide.
 - Removing containers that have come ashore in consultation with fire and rescue services. Refer to Appendix F - Dealing with Hazardous Containers Washed up on the UK Shoreline.
 - Storing and disposing of hazardous substances in the appropriate manner.

- Informing the MCA or nearest National Marines Operation Centre (NMOC) if a report of marine pollution of any type or quantity is received from a source that is not the MCA.
- 5.5.3 Newport City Council may be requested by the Bristol Channel Environment Group to provide an appropriately experienced and trained member of staff to act as Environmental Liaison Officer (ELO). Should this be the case, a member of the Ecology or environmental health teams should seek to fill this role.

5.6 PUBLIC HEALTH WALES (PHW)

5.6.1 PHW will:

- Assess exposure risks and potential impacts on population health;
- Provide representation to the BCSEG if convened, or provide direct support to the responding agencies if one if not convened;
- Advise on immediate counter-measure and decontamination to protect public health;
- Advise on public health protection/risk mitigation measures;
- Interpret and share information with other responding organisations;
- Provide effective and timely advice to inform risk communications.

5.7 ASSOCIATED BRITISH PORTS (ABP) SOUTH WALES & NEWPORT HARBOUR COMMISSIONERS (NHC)

- 5.7.1 Port Authorities have a statutory duty(¹) to have a Port Emergency Plan. They are also responsible for operations not only within the docks but also for the coastal water within the pilotage areas for vessels leading up to the docks (jurisdictional waters). These duties and procedures are outlined in the ABP Port Emergency and Business Continuity Plan for South Wales Ports (2019).
- 5.7.2 Under an agreement, first made in 2005 and renewed in September 2010 between ABP South Wales and Newport Harbour Commissioners (NHC), ABP South Wales are contracted by NHC to respond to and manage the responses for oil spills and other emergencies within the NHC Statutory area of Jurisdiction(2) (Appendix D).
- 5.7.3 Newport Harbour Commissioners are responsible for shipping on the river Usk up to Newbridge on Usk and for the development of harbour oil spill contingency plans.

^{(1) –} under Section 10 of The Dangerous Goods in Harbour Areas Regulations 2016 (2) – ABP South Wales Oil Spill Contingency Plan 2018

The Severn Estuary shoreline of Newport lies within the jurisdiction of Newport Harbour Commissioners (NHC) Refer to Appendix D - areas of jurisdiction in Severn estuary.

5.7.4 Newport Harbour Commissioners is the Navigation Authority for safe navigation on the tidal River Usk. However, there is an agreement with ABP that operate Newport Docks to oversee this role and respond to any incidents that occur in the NHC Statutory area of Jurisdiction (Appendix D).

5.8 HM COASTGUARD

5.8.1 HM Coastguard is part of the MCA and is responsible for informing Gwent Police, The Counter Pollution Branch of the MCA, Natural Resources Wales and the NCC of any pollution report.

5.9 DIVISION OF RESPONSIBILITIES FOR CLEAN UP(3)

Location of Pollution	Responsibility for clean up
On the water, jetties, wharves, structures, beach or shoreline owned by the harbour authority within the port/harbour area	Harbour Commissioner
Shoreline including land exposed by falling tide	Newport City Council
Jetties, wharves, structures, beach or shoreline which is privately owned	Owner of the property / land
All other areas at sea (inside the UK Pollution Control Zone and the UK Continental Shelf)	Maritime Coastguard Agency (MCA)

5.10 BRISTOL CHANNEL STANDING ENVIRONMENT GROUP (BCSEG)

- 5.10.1 The Standing Environment Group is part of a UK-wide network set up by the MCA. The Standing Environment Group's (SEG) main function is to prepare for marine pollution incidents in peacetime conditions. When the group is convened or in any way active in an incident response, it then becomes the Environment Group (EG).
- 5.10.2 The EG provides public health and environmental advice to all responding organisations in an incident. In Wales, the Environment Group is made up of personnel from Natural Resources Wales, Welsh Government Marine and Fisheries, and Public Health Wales.
- 5.10.3 The BCSEG covers the water body of the Severn Estuary from downstream of Gloucester west to a line between Lynmouth and the River Ogmore. This
- (3) Source: MCA National Contingency Plan A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations (2014)

- area includes tidal river stretches and the Barry, Cardiff, Newport and River Usk Operational port areas.
- 5.10.4 In the case of a pollution incident affecting the coastline of Newport, the Chair of the Bristol Channel Environment Group will be notified by the MCA or NRW and will decide whether there is a need to give advice and support to any response unit set up to deal with the incident.
 - One of the key reasons for an Environment Group convening is to remove the risk of the provision of conflicting advice, which may occur when there are multiple advising bodies and response cells. It acts as a pool of 'experts' providing a single point of contact.
- 5.10.5 It is important to note that a Tier 1 incident may not involve multiple organisations and require the involvement of an EG, but an awareness of the roles and responsibilities is important.
- 5.10.6 Responsibilities of the Environment Group include:
 - Assess the environmental and public health risks and the potential impacts arising from the incident.
 - Provide public health and environmental advice to all responding organisations to an oil and/or chemical marine pollution incident and subsequent clean-up operations.
 - Assess and advise response units on how to minimise the impact of the incident on human health, the environment, and potential impacts arising from any response operations, whether salvage or clean-up operations, at sea and on the shoreline.
- 5.10.7 Due to the current level of NRW presence within the EG, it is likely that it will operate from the NRW office in St Mellons, Cardiff during an incident to provide advice and guidance to responding organisations.
 - In some circumstances, the EG may relocate if it is deemed it can be more effective, especially if there is any escalation in the response.

5.11 NATURAL RESOURCES WALES (NRW)

- 5.11.1 NRW safeguards the quality of controlled waters, which ranges from the shoreline out to 3 miles into the estuary.
- 5.11.2 All commercially available dispersants must be approved by NRW, who also deal with the use of oil spill dispersants in Welsh waters.
- 5.11.3 Additional responsibilities include:
 - Protecting the shoreline, beaches, salt marshes, intertidal mudflats and river mouths/estuaries;

- Maintain sea defences and recommend pollution clearance procedures;
- Instigate legal proceedings against those polluting controlled waters;
- Provide scientific advice both at the scene of the incident and for the disposal of polluted waste;
- Where practicable, restore the water, flora and fauna to their original state.
- 5.11.4 NRW can advise on counter pollution policies relating to and affecting nature conservation.
- 5.11.5 Can administer Sites of Special Scientific Interest (SSSI's) and land areas with outstanding flora, fauna, and geological and physiological features (the Severn Estuary is one large SSSI).
- 5.11.6 NRW will liaise and co-ordinate with RSPCA, RSPB and the National Environmental Research Council.

5.12 WELSH GOVERNMENT

- 5.12.1 Welsh Government take the lead responsibility for the protection of the natural environment including marine pollution as a result of oil spillages for shipping in Wales and inside the UK territorial sea adjacent to Wales rests with the Environment Division of the Assembly Government.
- 5.12.2 The Department of Environment, Planning and Countryside is responsible for policy on fish, and the protection of fisheries, including liaison with the fishing industry up to 12 miles offshore.
 - In addition, the Welsh Government's Agriculture, Food and Marine Department have the lead policy responsibility for the protection of the natural environment out to 12 nautical miles offshore, including marine pollution.
- 5.12.3 On behalf of the National Assembly for Wales, NRW approves any use of dispersants in shallow and coastal waters.

5.13 GLOUCESTER HARBOUR TRUSTEES (GHT)

5.13.1 GHT is the Navigation Authority responsible for safe navigation for all Welsh Waters in the Severn Estuary as far west as Goldcliff, Newport (Appendix D).

5.14 ROYAL SOCIETY FOR THE PREVENTION OF CRUELTY TO ANIMALS (RSPCA)

5.14.1 The RSPCA will lead in dealing with wildlife casualties; it will take the lead in the welfare and rescue of animals affected by the incident and may

- co-ordinate other specialist organisations such as the Royal Society for the Protection of Birds (RSPCB)
- 5.14.2 The RSPCA will provide updates to the responding agencies with relevant information of how they can assist in the response.

6 RISK ASSESSMENT OF POTENTIAL HAZARDS

Pollution incidents involving the discharge of oil, chemicals or other materials into the sea in the waters around the UK happens for a variety of reasons. Almost any incident at sea that causes significant structural damage to a vessel presents the potential for causing marine pollution.

Every year, there are numerous vessels present in the Severn Estuary, whether they are used for pleasure, work or recreational fishing. There is a chance of any of these vessels becoming damaged by groundings and consequently sinking. If the vessel is grounded or sinks, relatively small quantities (maximum of 10 tonnes) of distillate fuels called Marine Diesel Oil (MDO) or Marine Gas Oil (MGO) will be released from the wrecks. Due to the relatively small quantities of fuel involved and their non-persistent nature, the effects of any oil pollution caused would tend to be limited.

In the event of a pollution incident, each agency will need to carry out risk assessments relevant to their roles before and during the clean-up, response and recovery phases.

6.1 SEVERN ESTUARY TRANSIT TRAFFIC

- 6.1.1 Due to the nature of the Severn Estuary's tidal incursion and its strong currents, any spill within the Estuary or even further west, has the potential to impact an extensive area including the Newport shoreline.
- 6.1.2 From 2017 data(4), there were over 23 million tonnes of cargo transported through the Bristol Channel to and from its numerous ports. The types of cargo includes:
 - Liquid bulk material (liquefied gas, crude oil and other oil products)
 - Dry bulk & general cargo (ores, coal, agricultural products and other dry bulk products)
 - Roll-on/Roll-off (road goods such as vehicles, rail wagons and caravans)
 - Lift-on/Lift-off (shipping containers that are lifted on or off ships).

Newport docks deal only with dry bulk and general cargo however due to the nature of the Severn Estuary, a pollution event involving the other types of cargo may affect the Newport shoreline. For example, Cardiff port receives liquid bulk in the form of petroleum products and alternative fuels that could affect Newport in a significant spill(5).

Annual number of ship arrivals at 8 of the largest Bristol Channel Ports (based on 2017 data)						
Barry	71					
Bristol	1375					
Cardiff	274					
Gloucester and Sharpness	124					
Neath	4					
Newport	689					
Port Talbot	193					
Swansea	148					
Total	2874					

NB: data was only available for these ports and not for any of the smaller ports that operate within the Bristol Channel(6)

6.1.3 Therefore, this plan recognises that there is significant shipping traffic within the Severn Estuary, which has the potential to cause coastal pollution incidents.

6.2 GWENT LOCAL RESILIENCE FORUM RISK ASSESSMENT

- 6.2.1 In line with the Civil Contingencies Act 2004, the Gwent Local Resilience Forum must assess hazards from a local perspective and produce a Community Risk Register (CRR). In line with national guidance, the register (Risk H15) includes an assessment for major pollution of controlled waters and assessed the major hazard scenario as being a 'Release of 100,000 tonnes of crude oil into the sea, polluting up to 200km of coastline'. An incident equalling or surpassing the thresholds included in Risk H15 would equate to a Tier 3 pollution response that would be beyond the capabilities of this plan.
- 6.2.2 Due to the location of the Gwent coastline (Newport and Monmouthshire) and assessment of shipping along the Severn Estuary, the risk of such an incident on this scale has been recognised as not possible. As such, the risk has been 'excluded' from the Community Risk Register.
- 6.2.3 The Gwent Community Risk Register plan displaying the exclusion of a major pollution of controlled water (H15) event can be found here:

^{(5) –} Source: Port Emergency and Business Continuity Plan South Wales Ports, Associate British Ports (2018)

^{(6) -} data available from: https://www.gov.uk/government/statistics/port-freight-statistics-2017-final-figures

https://gov.wales/docs/resilience/publications/150423-gwent-community-risk-register-en.pdf

Although the risk is not included in the CRR, the scope (section 3.1) of this plan is to address the response towards incidents regarding oil pollution in addition to substances that may be inert, hazardous and/or noxious threatening the Newport City coastline as suggested by the National Contingency Plan.

- 6.2.3 The likelihood of major pollution hazards along the Newport coastline are therefore improbable. However, the hazards of spillages such as 5,000 tonnes of heavy fuel oil or 20,000 tonnes of an oil derivative still have the potential for causing significant environmental impact and risks to public health. Approximately 3 million tonnes of oil derivatives are annually transported close to the Newport shoreline.
- 6.2.4 Newport Port does not handle any liquid bulk materials. However, in 2017, Bristol Port alone handled over 2.4 million tonnes of liquid bulk (includes crude oil, oil products, liquefied gas and other liquid bulk). This material would need to pass the Gwent Coastline during its transport and therefore presents a risk for Gwent LRF in regards to shoreline pollution to oil products.

6.3 GENERAL NATURE CONSERVATION RECOMMENDATIONS

- 6.3.1 The Newport coastline consists of the Caldicot and Wentloog Levels which are two areas of low-lying estuarine alluvial wetland and intertidal mudflats. The levels are formed from tidal deposits and alluvium and are an important wetland resource. Parts of the levels have been designated as Sites of Special Scientific Interest (SSSI).
- 6.3.2 The advice given by Natural Resources Wales and the Bristol Channel Standing Environment Group will be based on the principle of causing the least environmental damage. Therefore, response options will depend on many factors such as the volume and the type of oil, substrate and the access. These factors will inform the recommendations to remove the pollutant or leaving it to degrade and advice will be given on a case by case basis.
- 6.3.3 The aerial deployment of dispersants would not be permitted to occur within 1 nautical mile of land and/or in waters less than 20m depth.
- 6.3.4 Consideration should be given to emergency call-out of oiled bird rescue services/RSPCA if necessary.
- 6.3.5 Where oil comes ashore, natural degradation is a possible response option dependent upon the type of habitat that is present. Any areas within the Site of Specific Interest will have it's sensitivities considered by the response cell

to minimise environmental damage in the response.

7 NOTIFICATION

7.1 MARITIME AND COASTGUARD AGENCY

- 7.1.1 If an incident occurs that causes or threatens pollution to the Newport coastline, initial action will be taken by the Maritime and Coastguard Agency (MCA) Counter Pollution staff in conjunction with HM Coastguard.
- 7.1.2 If an incident occurs in a harbour area of jurisdiction it should be reported to the harbour master who will immediately inform the MCA.
- 7.1.3 Potential major pollution incidents can come from a variety of sources, and should be reported to HM Coastguard. They will then notify the Principal Counter Pollution and Salvage Officer (PCPSO) who will activate the National Contingency Plan and the Counter Pollution Branch as necessary.
- 7.1.4 When pollution threatens the Newport City coastline, the MCA (informed by the harbour master if the incident occurs inside a harbour area of jurisdiction) will inform Newport City Council's CCU and the EG. They will do this by emailing a CG77-POLREP (Appendix G) keeping them advised on the situation and actions being taken.

7.2 NEWPORT CITY COUNCIL

- 7.2.1 When receiving a shoreline pollution notification, the Civil Contingencies Unit (CCU)/Duty Officer (CCDO) should ascertain:
 - The nature and quantity of the pollutant involved;
 - Its location;
 - The source of the pollution;
 - The weather, sea state and tidal conditions in the area;
 - State of the incident:
 - Who else has been informed;
 - Are there any other vessels in the area;
 - Is there any assistance required by the NCC and;
 - Events and actions taken so far.
- 7.2.2 During office hours, consideration must be given by the CCU as to the most appropriate level of response for NCC as a whole. The CCU must ensure that:
 - Steps are taken to provide any immediate services that are required;
 - Contact Gwent Police and South Wales Fire and Rescue to confirm the information received about the incident;

- The Gold duty officer is informed that a pollution incident has occurred;
- The relevant service areas and staff members potentially involved in the response are informed of the situation (e.g. City Services, Environmental Health and Port Health Officers, Health and Safety);
- Ensure all decisions and actions taken are logged as soon as possible.
- 7.2.3 Notification of an incident outside of normal office hours will again, come through to the CCDO on call. A CG77-POLREP will be emailed to the civil contingencies email address. If a call comes from the public directly to the council then this call may come from the out of hours CCTV control room. The CCDO receiving the notification will:
 - Collect as much information as possible about the incident;
 - Contact Gwent Police and South Wales Fire and Rescue to confirm the information gained about the incident;
 - Assess the situation and inform the necessary service areas that may be involved in NCC's response to the incident;
 - Inform the Gold duty officer on call about the situation;
 - If the incident is under control or actions are already being taken, monitor the situation and request updates from those involved in the response;
 - Ensure all decisions and actions taken are logged as soon as possible, ideally within 24 hours of the incident notification.

8 INCIDENT RESPONSE

8.1 NEWPORT CITY COUNCIL

- 8.1.1 Upon notification of a Tier 1 shoreline pollution incident from the appropriate organisations, the CCU/CCDO will contact City Services, Environmental Health and Health & Safety to activate the appropriate personnel that will be involved in making shoreline pollution assessments as part of the Shoreline Clean-up Assessment Technique (SCAT) teams.
- 8.1.2 The SCAT forms (Appendix H) developed from NRW and NCC representatives will be sent to the BCSEG where a decision can be made on what advice should be given regarding clean up options, if any.
- 8.1.3 Due to the sensitive nature of Newport's coastline, small scale Tier 1 incidents may not require a clean-up response. However, advice will be sought from the BCSEG on what is the best action to take. Considerations in a Tier 1 incident are available in Appendix A.
- 8.1.4 The above recommendations primarily relate to oil pollution. As a general principle the actions taken by Newport City Council for other hazardous

- chemical pollution upon the coastline and other areas will follow the same procedures.
- 8.1.5 In the event of an incident, the appropriate officers can monitor the situation from a number of different locations along the Newport coastline (Appendix E). These locations will be of use to the SCAT Co-ordinator to identify locations where the assessment team can access the shoreline.
- 8.1.6 The SCAT Co-ordinator role is not designated to any organisation prior to an incident, but could be from NCC (City Services) or NRW who would be operating out of the Tactical Co-ordination Group (TCG). If a TCG has not been established due to it being a Tier 1 pollution incident, then an Emergency Co-ordination Centre will be established instead within the appropriate service area of Newport City Council.
- 8.1.7 There is no legal duty on organisations regarding the provision of personnel to form SCAT teams, but there is an expectation that relevant bodies such as Local Authorities and NRW would have a significant role in providing staff.
- 8.1.8 If necessary, an Emergency Response Team (ERT) can be set up in a number of different locations to co-ordinate the Council's response to the incident. These options can be found in Newport City Council's Corporate Emergency Management Plan.

The ERT is likely to include the following Service Areas:

- People and Business Change (Civil Contingencies, Health and Safety);
- Gold Duty Officer;
- City Services (Operations, Ecology and Cleansing);
- Law and Regulation (Corporate Communications, Democracy & Communications and Environmental Health);
- Other relevant personnel involved in response operations.

A template agenda for the initial meeting of this group can be found at Appendix A.

8.1.9 If the incident escalates to a Tier 2 then the response would be in line with the Gwent Major Incident Response Arrangements (GMIRA) in the absence of any specific arrangements for the wider Bristol Channel.

8.2 SOUTH WALES FIRE AND RESCUE SERVICE (SWFRS)

8.2.1 SWFRS will have a lead role during incidents involving the beaching of hazardous and noxious substances with regards to assessing the substances involved, making the affected area safe, recommending appropriate levels of PPE and deploying/operating decontamination equipment to site if required.

- 8.2.2 Specialist appliances may be mobilised to provide appropriate specialist equipment include the Detection Identification and Monitoring (DIM), Chemical Incident Unit, Environmental Protection, Decontamination Foam capability.
- 8.2.3 In an incident, SWFRS can also provide specialist advice through Hazardous Materials Advisors (HMA) who have specialist training in hazardous materials and environmental protection.

8.3 NATURAL RESOURCES WALES (NRW)

- 8.3.1 Upon being notified of the incident by the appropriate organisation, NRW will activate their incident response centre which has 24/7 capability.
- 8.3.2 NRW will activate appropriate members of staff to contribute to a SCAT team along with NCC. The SCAT team will be co-ordinated by the SCAT Co-ordinator which can be sourced from NRW or NCC.
- 8.3.3 After receiving assessment information/forms from the SCAT team, the BCSEG will issue advice on the preferred course of action.
- 8.3.4 A number of factors could influence the advice that BCSEG give regarding clean-up actions. Therefore, advice will be given on the day depending on the information provided from SCAT teams.

8.4 HEDDLU GWENT POLICE

8.4.1 Gwent Police will manage cordons and road closures in areas surrounding the location of the pollution if appropriate in order to manage any public or media presence at the incident site.

8.5 BRISTOL CHANNEL STANDING ENVIRONMENT GROUP (BCSEG)

- 8.5.1 The BCSEG will convene if considered appropriate by the chair of the group. Personnel may include representatives from organisations such as Natural Resources Wales, Welsh Government Marine & Fisheries, and Public Health Wales.
 - The BCSEG activation plan (2019) can be accessed on the follow link: https://collaborate.resilience.gov.uk/RDService/home/110751/Activation-Plan
- 8.5.2 When considering all relevant information regarding the incident, the BCSEG will issue any advice to those organisations involved in the operational response and clean-up as to what actions are permitted depending on the situation.
- 8.5.3 Should an incident lead to harmful impacts on land (i.e. continued release of harmful vapour clouds), the National Contingency Plan recognises that a Scientific and Technical Advisory Cell (STAC) may be integrated with the Environment Group.

9 WASTE STORAGE AND REMOVAL

- 9.1 If the pollutant can be removed from the shoreline subject to advice from the BCSEG and NRW, then there are avenues that can be explored to manage its storage and disposal.
- 9.2 A reason to implement a temporary storage site near to the shoreline can arise due to there being no immediate disposal outlet for the pollutant and clean-up operations cannot be slowed or stopped.
- 9.3 The identified site needs to meet certain criteria such as being a certain size; being situated close to the shoreline; situated on a flat piece of land and be able to be accessed by vehicles transporting the waste to disposal sites.
- 9.4 The temporary site itself may require an environmental permit or may be exempt from the Environment Permitting Regulations 2010 in the case of an emergency. It is essential that the construction of temporary storage sites be carried out through close liaison between NRW and NCC.

10 FINANCE

- Owners of the tankers causing the pollution are responsible for the incident, regardless of fault, under strict liability. The liability is assessed by ITOPF (the International Tankers Owners' Pollution Federation). ITOPF in turn advises the insurance clubs in relation to claims.
- 10.2 In the event of a pollution incident, costs must initially be met through individual directorate's budgets. A record of expenditure incurred must be kept by all directorates and immediate consideration should be given to the implementation of special financial arrangements.
- 10.3 NCC will always seek to recover costs from the polluter where possible. The MCA may often collate material from all responders to the incident and make a joint claim for compensation. However, there is no certainty that the MCA will take this approach and will decide during or shortly after the incident.

- 11.1 Any communication issues should be referred to the NCC's Public Relations/Corporate Communications team, who should, depending on the scale of the incident, make provision for monitoring media coverage, keeping the public informed and releasing public announcements.
- 11.2 In the case of chemical incidents, communications about the possible health risks will be important. PHW possess a document "Communicating public health risks associated with the maritime transportation of hazardous substances (2013)" containing FAQs for different chemical types and this may be of use during such incidents.
- 11.3 In larger incidents, the MCA would seek to set up a Media Cell to control communications and keep all organisations involved in the response informed. In smaller incidents where the MCA is not involved, it will be beneficial for Newport's and NRW's communication teams to liaise with one another and any other involved organisations.
- 11.4 In the event of NCC's Emergency Response Team (ERT) being established, all corporate information and communication issues should be referred to the ERT. A member of the Communications Team will be present on the ERT and help to co-ordinate any information flow.
- 11.5 The mobile phone coverage for the following networks along the coastline of Newport is as follows:
 - EE good 4G coverage outdoors and indoors but only outdoor coverage in an area stretching from Goldcliff to the Severn Power Station(7).
 - O2 good 4G coverage both outdoors and indoors but only outdoors in a small area of Goldcliff west of Newport Seawall(8).
 - Vodafone limited 4G coverage around the Goldcliff area that stretches along the majority of the coastline east of the River Usk(9).
 - Three good 4G coverage outdoors and indoors but only outdoor coverage for some of the Goldcliff area, Newport docks and some isolated areas west of Lighthouse park residential estate(10).

^{(8) -} https://www.o2.co.uk/coveragechecker

^{(9) -} https://www.vodafone.co.uk/network/status-checker

12 RECORD KEEPING

- 12.1 It is essential to keep accurate records of any actions taken and the rationale behind all decisions based on the information known at the time. These records should be maintained throughout the incident at all response levels.
- 12.2 Record keeping will be essential for cost recovery and any potential litigation following the incident and response to it.
- 12.3 After the incident, each organisation involved must collect and store records. The length that they are stored may depend on the nature of the impacts of the incident as well as potential investigation/inquiry into it.

13 RECOVERY

- 13.1 Recovery is defined as being the process of restoring and rebuilding the community, and supporting groups particularly affected in the aftermath of an emergency. In a shoreline pollution incident, the recovery phase may overlap with the initial response phase. The recovery phase will be led by NCC. Details of the recovery process can be found in the Gwent LRF Recovery Plan
- 13.2 The Gwent LRF Recovery plan can be accessed via the following link:

 https://collaborate.resilience.gov.uk/RDService/home/46682/RECOVERY

APPENDIX A

EMERGENCY RESPONSE TEAM - INTIAL MEETING AGENDA

- 1. Introductions
 - a. Purpose of meeting
 - b. Confirm lead minute taker/decision loggist
 - c. Confirm lead communications officer
- 2. Membership Gold Duty Officer, CCU, City Services (Cleansing, Ecology and Operations), Law and Regulation (Environmental Health, Insurance), Health and Safety, Corporate Communications, Democracy and Communications
- 3. Briefing on current situation by Chair of ERT/Civil Contingencies
 - a. Situation update
 - Actions to date: completed and outstanding (NA for first meeting) –
 Chair
 - c. Additional supporting information All
- 4. Assessment of current and potential impact on Newport coastline
 - a. Identification of any immediate public and environmental health risks
 - b. Shoreline Clean-up Assessment Technique (SCAT) membership
 - c. SCAT co-ordination
 - d. Access points to Newport shoreline
- 5. Sources of advice for clean-up
 - a. Bristol Channel Standing Environment Group (BCSEG)
 - b. Natural Resources Wales (NRW)
 - c. Additional advice
- 6. Consideration of emergency response/incident mitigation options (at end of agenda)
- 7. Consider:
 - a. Need to confirm requirement for recording of all costs relating to the incident response.
 - b. Need for additional personnel to support ERT with issues e.g. Business Continuity, Recovery, Voluntary Sector, vulnerable persons.
 - c. Any contact arrangements/representational requirements for strategic/tactical level controls.
- 8. Formulate action plan and allocate tasks and responsibilities

- 9. Communications:
 - a. Responders and polluter (if known)
 - b. Media, Social Media & Community engagement
 - c. Elected members
- 10. Any other business
- 11. Date and time of next meeting

Considerations for service areas during a response:

- Oiled debris and substrate present in water and at the high water mark would preferably be collected if access is permitted. However, if access is not permitted, then it would preferably be left to disperse and degrade naturally;
- If there is sufficient notice, then shorelines and beaches may be cleared of materials that may be impacted by the pollution to reduce the quantities of waste for disposal;
- Use of sorbent materials is to be avoided:
- No removal of oil surface sediments using earth moving equipment is allowed:
- Hosing and flushing is to be avoided;
- Do not use hot water or steam treatment;
- Recovery of oil by skimming and pumping to temporary storage should be avoided;
- ➤ Oil biodegradation enhancement is the alternative preferred option, but should only be used on advice from Natural Resources Wales due to the sensitive marine ecosystem of saltmarsh;
- Do not use dispersants or dispersing gels;
- Monitor and manage the response.

ACTION LISTS FOR RESPONDING NCC SERVICE AREAS

- 1. People and Business Change:
 - Civil Contingencies:
 - ➤ Upon receiving notification of any incident, assess the required response and contact the necessary service areas/personnel:
 - City Services (Highways/Operations, Cleansing/Operations, Ecology)
 - Law and Regulation (Environmental Health, Insurance, Communications)
 - People and Business Change (Health and Safety)
 - o Gold Duty Officer
 - Via the Gold Duty Officer, initiate the NCC's Emergency Response Team (ERT) to take over the co-ordination of the response;
 - Co-ordinate the response until the ERT is set up;
 - Ensure representation at any multi-agency meetings.
 - Health and Safety:
 - Continually assess the safety of staff responding to the incident, whether it be performing road closures or carrying out assessments on the affected area of the coastline.

2. City Services

- (Highways/Cleansing/Operations):
 - Assist Gwent Police with road closures preventing public access to the affected area(s);
 - ➤ Ensure staff are available and trained to support NRW in carrying out SCAT surveys of the coastline;
 - If necessary, assist or take the lead role in co-ordinating the SCAT process by suggesting locations on the coastline for surveys to take place;
 - Depending upon advice from NRW, carry out clean-up operations of the coastline to remove the pollutant;
 - ➤ Ensure representation at a multi-agency group (i.e. TCG) if necessary.

3. Law and Regulation

- Environmental Health
 - Assess any impact from the pollutant on the public and environment and advise accordingly;
- Legal and Insurance
 - Provide legal advice to the authority during response and recovery phases of the incident when required.

Communications:

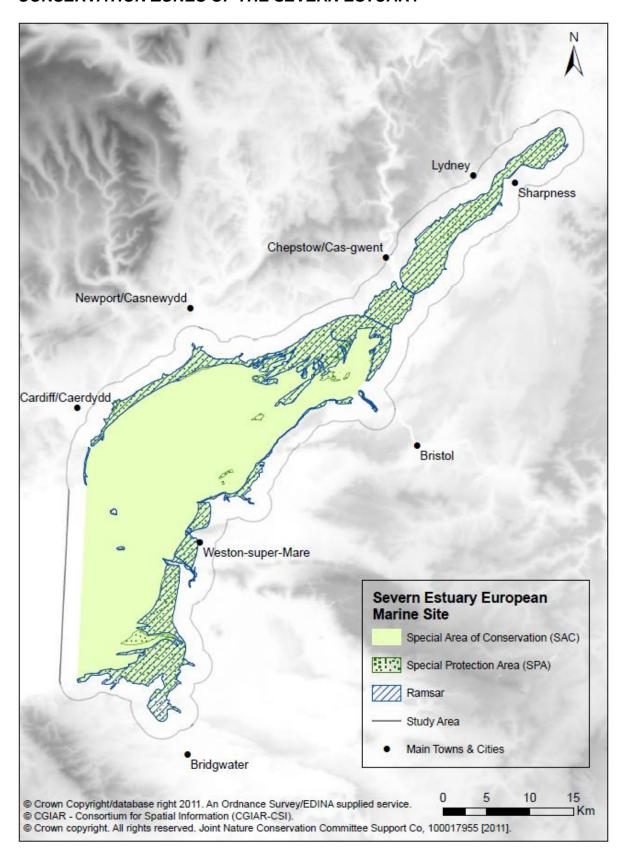
- ➤ Engage with other responding organisations in developing communication lines with the public and staff members;
- Assist in ensuring information regarding the incident is available to the public and staff via the NCC website, intranet and social media.

• Contact Centre/CCTV:

On receipt of a call from the public or emergency services, will take details of the caller and incident and relay immediately to Civil Contingencies.

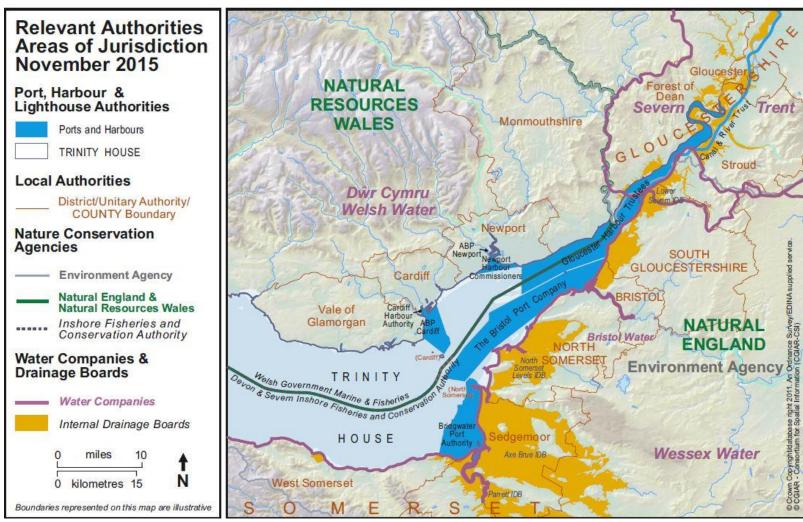
APPENDIX C

CONSERVATION ZONES OF THE SEVERN ESTUARY



APPENDIX D

AREAS OF JURISDICTION IN THE SEVERN ESTUARY



Source: https://www.asera.org.uk/resources/publications/

APPENDIX E

ACCESS POINTS TO THE NEWPORT COASTLINE

Bristol Channel Environment Group: SCAT Co-ordinator maps

Map 3: Redwick to Lighthouse Park, West Newport - Survey units 9 to 17

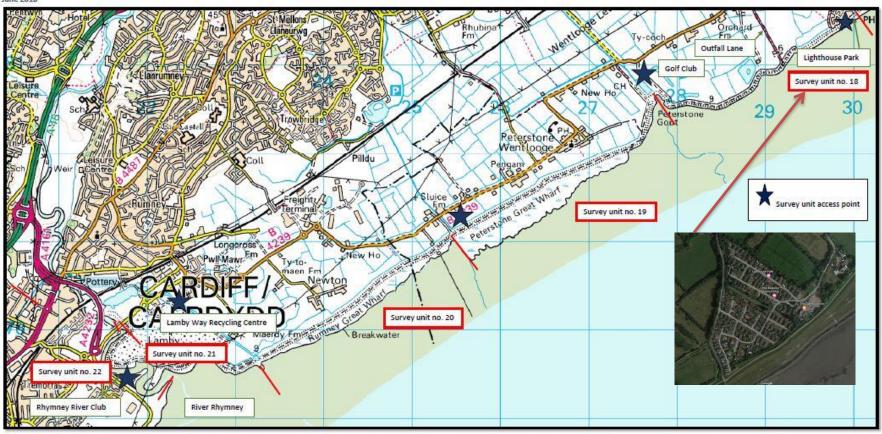
Broadstreet Whitson Court EWPORT LEASNEWY Survey unit access point Henton Fm Whitson Earthwork ! Survey unit no. 16 Great o Modelands PH Goldcliff Samson New Ho West Usk Porton-Ho 6 Trail Newport Wetland Reserv Elver Pill Survey unit no. 17 Survey unit no. 12 Survey unit no. 9 Survey unit no. 10 Survey unit no. 9 (2.6km) Survey unit no. 17 (1.9km) Goldcliff Point Elver Pill West Usk Lighthouse Lighthouse Park ST 3730 8191 ST 3113 8288 ST 3002 8151 Access: Back-ditch track for NRW vehicles Elver Pill: Lane from Redwick through West Usk Lighthouse - lane from New House Mead Farm along Broad Mead, Park at Lighthouse Park end of lane (see Map 2) Lighthouse Park – public parking area. Goldcliff Point - public parking area.

Survey unit no. 16 (2km)		Survey unit no. 15 (1km)		Survey unit no. 14 (1.3km)		Survey unit no. 13 (1.5km)		Survey unit no. 12 (4.3km)		Survey unit no. 11 (2.6km)		Survey unit	Survey unit no. 10 (1.3km)	
West Usk Lighthouse	R. Ebbw (west), first bend	R. Ebbw (east), Dock entrance first bend		Newport Docks River bend to dock entrance		St Julian's Reen Fifoots Point, River Usk Uskmouth		Fifoots Point, Uskmouth	Goldcliff Pill (mouth)	Goldcliff Pill, be village	oth banks up to	Goldcliff Pill (mouth)	Goldcliff Point	
ST 3113 8288	ST 3084 8465	ST 3094 8467	ST 3163 8391	ST 3289 8467	ST 3167 8393	ST 3306 8426	ST 3202 8339	ST 3202 8339	ST 3594 8237	ST 3594 8237	ST 3615 8231	ST 3615 8231	ST 3730 8191	
Access Option 1: lane Option 2: West lane from New	: Usk Lighthouse –	to visit - Tel: 029	British Ports prior 920 835023 Report and Docks Office	to visit – Tel: 02	British Ports prior 1920 835023 Report 1910 and Docks Office	Access Uskmouth Powe Report at securit Park at Newport	y gate	This site is man such, it is likely others, contact	cess: Newport Wetlands Reserve is site is managed by NRW. NRW wardens based in Goldcliff have received SCAT training th, it is likely that they will undertake the surveys. Where surveys need to be carried out hers, contact with the wardens should be made prior to any site visit to confirm access rangements to the survey units. Site Manager – Tom Dallymple		ed out by			

Bristol Channel Environment Group: SCAT Co-ordinator maps

Map 4: Lighthouse Park, West Newport to mouth of River Rhymney - Survey units 18 to 22

June 2018



Survey unit no. 22 (1.6km)		Survey unit no. 21 (3.1km)		Survey unit no. 20 (2.7km)		Survey unit no. 19 (2.9km)		Survey unit no. 18 (2.9km)	
Rhymney mouth	R. Rhymney Bridge	R. Rhymney Bridge	Lamby Way Outfall	Lamby Way Outfall	Sluice Farm	Sluice Farm Peterstone Gout		Peterstone Gout	Lighthouse Park
ST 2215 7733	ST 2164 7800	ST 2168 7804	ST 2329 7756	ST 2329 7756	ST 2545 7909	ST 2545 7909	ST 2776 8067	ST 2776 8067	ST 3002 8151
Access Uncertain; park at (boat club)	ain; park at Rhymney River Club Cardiff Council Refuge Centre; report at reception Sluice Farm – park either beside road or on track leading to foreshore. Peterstone Goi report to office		– Peterstone Golf Club, oark beside lake. rk either beside road or on oreshore.	Lighthouse Park – po	eterstone Golf Club, report e lake.				

APPENDIX F

DEALING WITH HAZARDOUS CONTAINERS WASHED UP ON THE UK SHORELINE

- 1. MCA will act as the co-ordinator to all response organisations in incidents when hazardous containers are found to be coming ashore along greater stretches of coastline than that of individual local authorities.
- 2. The following organisations are likely to become involved in responding to hazardous containers on the shoreline. Their roles and responsibilities are as follows:

Fire & Rescue Services

Inspect, contain and make safe suspect containers.

Provide HAZCHEM data to responders as appropriate.

Notify Natural Resources Wales and Newport City Council if considered a danger to health or the environment.

Provide specialist advice through Hazardous Materials Advisors (HMA).

Local Authorities

Remove containers in consultation with Fire & Rescue Services and NRW. Store and finally dispose of hazardous materials in the prescribed manner laid down in current regulations.

Inform HM Coastguard.

Arrange contractors in consultation with NRW to remove and dispose of waste if polluter cannot be identified or act within a set timescale.

HM Coastguard

To receive reports on confirmed hazardous containers washed up on the shoreline and inform MCA.

MCA

To receive information on confirmed hazardous containers washed up on the shoreline. As appropriate, disseminate information received to other local authorities who the MCA consider to be under threat from pollution contamination by hazardous materials.

NRW

Assess the threat to controlled waters and the impact on the environment.

Provide advice on the appropriate actions regarding waste clean-up.

Licence any removal contractors disposing of waste in consultation with Newport City Council if polluter cannot be identified or act within a set timescale.

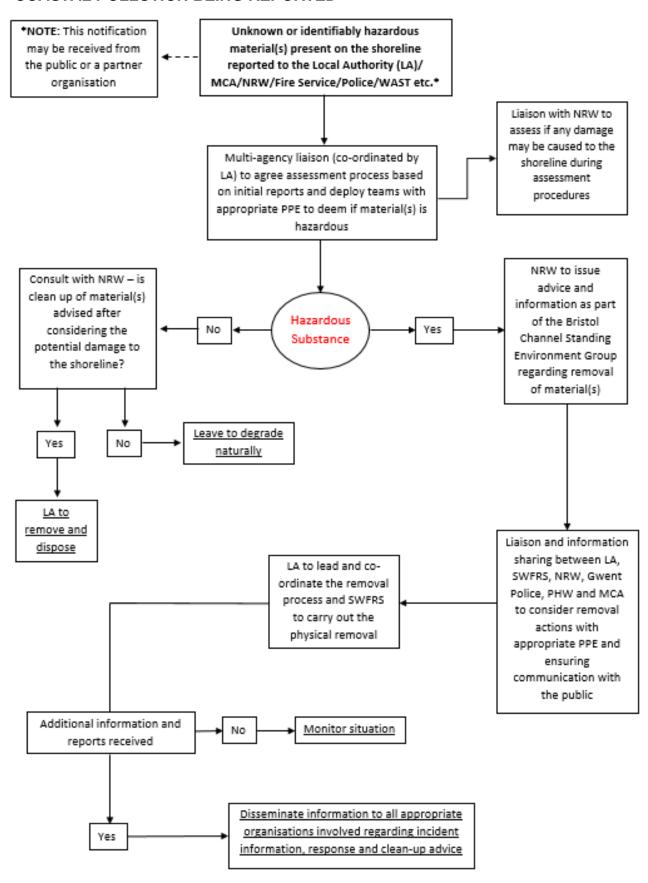
Can provide partners with the approved contractor list they keep for the disposal of waste including fly-tipped drums.

PHW

The Environmental Health Protection team, with support from Public Health England Centre for Radiation, Chemical and Environmental Hazards (PHE CRCE) can provide advice on potential public health risks from chemicals.

The flowchart on the next page illustrates the actions to be taken by each organisation in the event of incidents involving hazardous containers on the UK shoreline

MULTI-AGENCY COMMUNICATIONS AND ACTION LIST IN THE EVENT OF COASTAL POLLUTION BEING REPORTED



NB: This applies only for a Tier 1 pollution incident and may change for Tier 2 and 3 incidents.

APPENDIX G

CG77-POLREP FORM

	77-PULKEP FURIVI	Incident Details
Da	te	Time
	me & Organisation	Timo
	lephone	Email
Α	Pollution Confirmed?	
В	Reported By	
	Date	
	Time	
С	Position and Extent	*latitude and longitude if possible*
	Volume	
	Volume Remaining	
	Location	
	Distance from Coast	
D	Conditions	
	Ebb/Flood	
	HW Time	
	Speed of Tide	
	Direction of Tide	
	Wind Speed Wind Direction	
E	Weather Conditions	
_	Wave Height	
	Sea State	
	Swell	
F	Appearance	
	Type of Spill	
G	Source	
	Vessel/Structure Name	
	Type and Size of	
	Vessel	
	Cargo and Contents	
Н	Vessels in Area	
J	Photos and Samples?	
K	Remedial Action	
	Dispersants	
_	Booming etc.	
L	Forecasts of Likely Effects	
M	Persons Informed	
IVI	SOSREP	
	MCA	
	NRW	
	Other	
N	Other Information	
	o. III.o.iiiadoii	<u>I</u>

APPENDIX H

SHORELINE CLEANUP ASSESSMENT TECHNIQUE (SCAT) FORM

1 General Incident: Local Authority:
Date: Survey from: Boat / Viewpoint / Foot Weather & tide:
Time:
2 Surveyors Org./Tel./Radio No.:
Org./Tel./Radio No.:
Org./Tel./Radio No.:
3 Segment ID / Shore name & location (Where in county? What part of shore surveyed? Mark on map/sketch overleaf)
4 Shore Types ✓ ✓ = primary ✓ = secondary Bedrock: cliff slope platform wedges
Stable boulders/cobbles Mobile boulders/cobbles/pebbles Solid seawalls Revetment
Coarse sediment Mobile sand Stable sand Stable sand Stable mixed substrate
Firm muddy sand Soft mud Saltmarsh Reed swamp Other:
Prominent features: Pools Deep cracks/cervices Pockets of sediments between rocks
Strandline debris & litter:
5 Operational features Ongoing clean-up activity :
Access to shore:
Access on shore:
Suitable laydown/storage areaOiled Debrisbags/trucks
6 Surface Oil (mark location and extent on map/sketch overleaf) Describe surface oiling using the following terms if possible: Location: above/below strandline. Distribution: Continuous, Broken, Patchy, Sporadic. Oil Thickness: Thick oil, Cover, Stain, Film. Oil Character: Fresh, Mousse, Tar Balls, Tar Patties, Tar, Surface Oil Residue, Asphalt Pavement. Area: Describe area of oil coverage with dimensions (pace out shore lengths and band widths)
Risk that shoreline oil could remobilise? Floating oil (close to shore)?

7 Subsurface Oil Observed / Likely / Unlikely / Don't Know (mark location on map overleaf) Explain reasons for above categorisation. Describe observed subsurface oiling suing the following terms where possible: Location : above/below strandline. Distribution : Extensive, Frequent, Uncommon. Oil descriptors : depth & band thickness (cm), Heavy deposits (mobile?), Residue, Film or Stain, Asphalt Pavement
8A Resource sensitivities and other constraints on clean-up (ecological / recreational / cultural / economic; incl. wildlife casualties)
8B Clean-up recommendations (Oil, debris, litter)
9 Sketch maps / profiles
Dhata 8 Video . 4
Surveyed Oiled area Sea water Shore Shore Shore Shore Shore Sweet Shore Sweet

*NOTE: There is an instruction manual on how to complete a SCAT survey form available on Resilience Direct. This can be obtained via Civil Contingencies.

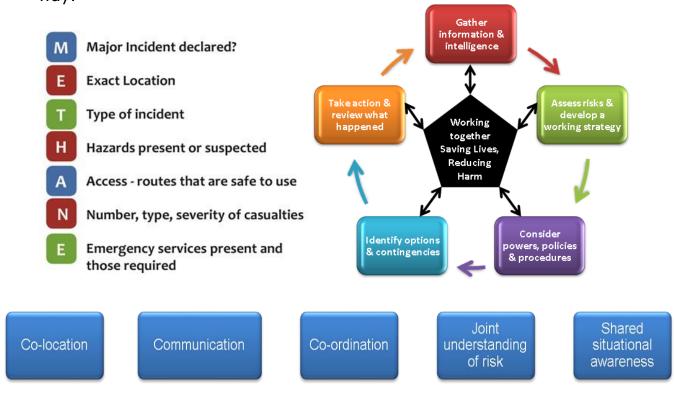
APPENDIX I

JESIP DOCTRINE AND PRINCIPLES

The Joint Emergency Services Interoperability Programme (JESIP) was established in 2012 to address the recommendations and findings from a number of major incident reports. It was primarily about improving the way the **Police, Fire & Rescue and Ambulance services** work together when responding to major multi-agency incidents. It is important however that other organisations involved in emergency response in Gwent are familiar with the principles for joint working, and are aware of the Joint Decision Model (below - right) so that they can engage in this process.

JESIP has produced practical guidance to help improve multi agency response. The Joint Doctrine: "the interoperability framework" sets out a standard approach to multi-agency working, along with training and awareness products.

One of the most important aspects of JESIP is that wider responders should become familiar with the method by which to share initial incident information. The adoption of the METHANE model (below - left) will improve both the reporting and receiving of information in a consistent way.



Further information including Aide Memoires can be found on the <u>JESIP website</u> or by downloading the mobile app.