An Roinn Iompair
Department of Transport

National Maritime Oil/HNS Spill Contingency Plan 2020

Implementation Program Annual Review 2021

Contents

Exercise Report Version History

Version	Comment
0.1	23rd March 2022
0.2	1st May 2022
0.3	8th May 2022
0.4	14th May 2022
0.5	26th August 2022
0.6	12th December 2022

1. Introduction

1.1 Background

The Minister for Transport (Coast Guard) has developed a plan in accordance with the Sea Pollution (Amendment) Act, 1999 specifying the measures to be taken to prevent and minimise damage in the State resulting from discharge of oil/HNS from ships, offshore units and oil handling facilities. This National Maritime Oil/HNS Spill Contingency Plan (NCP) meets the requirement of the International Convention on Oil Pollution Preparedness, Response and Co-operation (OPRC) to which Ireland is a signatory. The requirement for a NCP is further underpinned by the EU Vessel Traffic Monitoring and Information Systems Regulation 2010 and S.I. No. 573/2010 - European Communities (Vessel Traffic Monitoring and Information System) Regulations 2010 which sets out amongst other things, requirement to report incidents and accidents at sea, monitoring of hazardous ships and intervention in the event of incidents and accidents at sea, accommodation of ships in need of assistance (plans for Places of Refuge), requirement for Coast Guard to monitor compliance with the obligations of mandatory ship's routing systems i.e. Traffic Separation scheme of Fastnet and Tuskar.

The Sea Pollution Act, 1991 requires Authorised Officers of the Coast Guard following upon a maritime casualty to prevent, mitigate or eliminate danger from pollution where there is grave and imminent danger of major harmful consequences through pollution to the coastline or related interests. "Related interests" means the interests of the State and the health and well-being of its citizens and includes:

- the health of the coastal population and the wellbeing of any area concerned;
- marine resources, flora, and fauna;
- maritime coastal, port, or estuarine activities, including fisheries activities, which constitute a means of livelihood for persons concerned; and
- the tourist attractions of any area concerned.

The NCP provides for:

- placing of equipment and materials to be used in connection with the removal, degrading or disposal of a discharge of oil/HNS into the sea or onto land;
- training in the use of equipment and materials;
- conducting exercises;
- maintaining and improvement of co-operation and communication between persons required to comply with the provisions of the plan or specified in a direction by an Authorised Officer; and
- a framework for coordination and cooperation between national and international stakeholders in the event of a significant incident.

The Coast Guard is responsible for approving plans prepared by Local Authorities, Harbour Authorities, operators of offshore Units or Oil Handling Facilities for the prevention and minimisation of damage, arising out of an oil/HNS incident occurring.

In 2018 the IRCG commenced a project to develop a national contingency plan (NCP) which, in satisfying our legislative and international obligations, would additionally seek to benchmark against best practice models for such arrangements currently in place in similar jurisdictions internationally. Maritime New Zealand, through analysis, was considered as the optimum best practice analogue for the purposes of the project. The Irish Coast Guard was assisted by Pertonia Consulting UK in the plan development process and provided independent expertise and support in the analysis and arrangements which underpin the finalised NCP.

Completion of this process effectively addresses one of the high risks on the Department's risk register, ensures Ireland is fully compliant with its international obligations in this area and sets out a roadmap to continually manage and improve Ireland's state of readiness for an oil / HNS spill incident.

What has the Project delivered?

1. A National Gap Analysis (GA) of the current national preparedness and responses capacities in respect to an effective regime for response to marine casualty incidents, monitoring or intervening in marine salvage operations, and preparedness and response to pollution by oil and HNS within the Irish Exclusive Economic Zone (EEZ).

2. A National Risk Assessment (RA) which included analysis of the following primary activities that pose a risk of spills in Irish waters: Vessel Operations, Offshore oil and gas exploration & production and Sea ports including oil/HNS terminals, pipelines and other oil/HNS handling or storage facilities.

3. A National Maritime Oil and HNS Spill Contingency Plan (NCP) which establishes a national framework and strategy to coordinate marine pollution preparedness and response. It addresses all oil and HNS pollution whether it originates from ships, harbours, offshore units or oil/HNS handling facilities and land-based sources. It covers waters in the Irish EEZ.

4. A National Maritime Oil and HNS Spill Contingency Plan Implementation Road Map. In order to give full context to the recommendations from the Gap Analysis and provide the components to establish a coherent maritime pollution response framework a road map has been developed, this framework aims to give clarity of purpose and clear line-of-sight between the recommendations, on-going and future developments required to successfully implement the NCP.

1.2 The National Gap Analysis.

The GA is an integral part of a project to prepare and deliver a national contingency plan (NCP). The International Maritime Organization (IMO) has drafted guidance for the implementation of the OPRC Convention and the OPRC-HNS Protocol. These two IMO instruments include the requirement to develop a national system for preparedness and response to oil and HNS pollution, including a national plan, additionally the instruments outline the key steps required for implementation. These steps framed the conduct of the gap analysis in the following areas: the national and international legislative basics, evaluation of the current national organisational structure, capacity across responsible agencies to support an implement the plan, current national preparedness and response capacity, ability to maintain and further develop regional and international relationship and cooperation in the area of response and the requirements for standards in exercise and training.

The gap analysis showed that Ireland has a solid legal and operational foundation for the development and revision of its national response capacity while identifying some areas for improvement. The analysis outlines twenty-one key recommendations across the highlighted areas which once addressed will enhance the national capacity to support plan implementation and improved overall preparedness and response to maritime pollution and major incident response.

1.3 The National Risk Assessment

The risk of a spill at sea is related to:

- the probability of an activity causing a spill, and
- the severity of the outcome on the affected environmental and socio-economic resources.

The primary activities that pose a risk of spills in Irish waters and were subject to the risk assessment were: vessel operations, offshore oil and gas exploration & production, risk posed by seaports including oil/HNS terminals, pipelines and other oil/HNS handling or storage facilities and the potential for transboundary movement of pollution from neighbouring countries' waters is also possible, though prevailing winds and sea currents tend to mitigate against this.

Additionally, the risk assessment took cognizance of prior assessments conducted in recent years (Marico Marine, 2012 and BE-AWARE, 2015), analysed IRCG AIS (Automatic Identification System) and LRIT (Long Range Identification and Tracking) information to produce charts illustrating vessel traffic density in Irish waters. These projects used shipping data and historic data on maritime pollution accidents, alongside environmental sensitivity information, to identify a broad picture of risk.

The assessment process identified a relatively low risk of a major pollution incident, this was underpinned by the widely accepted approach to preparedness i.e., using an escalating approach, based on the ability to cascade in suitable resources to respond to an incident – this is commonly referred to as 'tiered preparedness and response'. This emphasises the importance of effective co-ordination arrangements at the national level, able to supplement capability by mobilising assistance through established international mechanisms as needed. This being a cumulative output from the implementation of a robust National Maritime Oil and HNS Spill Contingency Plan.

1.4 The National Maritime Oil and HNS Spill Contingency Plan 2020

The new NCP establishes a national framework and strategy to coordinate marine pollution preparedness and response. It addresses all oil and HNS pollution whether it originates from ships, harbours, offshore units or oil/HNS handling facilities and land-based sources. It covers waters in the Irish EEZ.

Coordination between the IRCG and other government or non-government entities is an essential feature of the national organisation represented in the NCP. It also addresses the mechanisms to request assistance from other countries through bi-lateral and multi-lateral arrangements. Further it provides a platform to coordinate responses in the context of the national strategic Major Emergency Management frameworks , this includes the establishment of a National Emergency Coordination Group (NECG) at the National Emergency Coordination Centre (NECC) convened by the Office of Emergency Planning, as requested and chaired by the

Lead Government Department (LGD). This structure provides the coordination mechanism for all relevant arms of government to work together in support of the LGD.

Amongst other resources the NCP establishes the Maritime Response Team (MRT) which supports the following functions (a) oversight and support to a harbour authority, facility, or local authority response undertaking response or (b) command, control, and coordination in cases of ship-source incidents outside of port limits or major incidents requiring national-scale resources to be mobilised. In addition, the Irish Coast Guard, as the competent national authority, also ensures oversight and approval of contingency planning and response of other entities, including local authorities, harbour authorities, offshore units and oil/HNS handling facilities.

The NCP includes a number of guidance documents and standard operating procedures and their appendices which address the following key elements of effective preparedness and response: assessment and notification, establishment and function of the Incident Command System, oil spill control agents, establishment of a shoreline response centre, place of refuge and guidance to non-governmental stakeholders in respect to the content and implementation of contingency plans.

The effective and robust implementation of the NCP will be supported through the establishment of two national consultative committee's and fora, namely the new National Maritime Pollution Response Committee (NMPRC) and the Consultative National Maritime Pollution Response Forum (CNMPRF). The National Maritime Pollution Response Committee will be providing the plan with strategic coordination, guidance and regular review so as to ensure the NCP and its content remain valid and operationally effective. The membership for the NMPRC will be drawn from the Principal Response Agencies (PRA's), relevant other Departments & Government Offices and will be chaired by the Director of the Irish Coast Guard. The Consultative National Maritime Pollution Response Forum provides a platform for non-statutory groups of external stakeholders, including private sector and non-governmental organisations to support the implementation and future development of the NCP, again this forum will be chaired by the Irish Coast Guard.

1.5 National Maritime/OIL HNS Contingency Plan implementation.

On successful completion of the NCP, a detailed implementation plan inclusive of statements of vision and strategy were developed, these statements were then supported by key national goals (1-4) in terms of function and capacity for successful implementation (fig 1.0). In meeting the challenges of the implementation plan and its associated structures the Coast Guard conducted a review of current structures and human resource capacities in area of preparedness and response.

The review culminated in a resourcing business case which based on the implementation plan sought a revision of the Coast Guards current “Pollution and Salvage Section” to a “Preparedness, Response and Planning Section (PRP)” within Coast Guard Operations Branch.

The business case included the requirement for two additional Operations and Training Officers (OTOs) to the PRP Section. In total the section would comprise of three principle strategic focal points in answering the requirements of the NCP implementation Plan (Goals 1-4), namely Preparedness Section, Planning Section and Response Section each lead by an OTO. Sanction for these additional resources were secured from the DoT management Board in February 2021, within the commensurate resourcing coming on stream in Q3/Q4 2021.

IMO Conventions →

EU Directives →

National legislation →

VISION

Ireland has an efficient, resilient, and fit-for-purpose marine pollution preparedness and response, embedded in an integrated maritime incident response system

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STRATEGY STATEMENT

Develop and co-ordinate an effective regime for preparedness and response to spills of oil and HNS from vessels, oil/HNS handling facilities and offshore units within the EEZ, to provide an efficient and effective response to maritime casualty incidents and to monitor/intervene in salvage operations

↓ ↓ ↓ ↓

GOAL 1	GOAL 2	GOAL 3	GOAL 4
Ability to mount an efficient and effective national response to marine pollution	Ability to prevent pollution through casualty and intervention and source control	Offshore Units, Harbours/Ports and Local Authorities have in place marine pollution plans aligned to the national system	IRCG maintains relationships that improve preparedness and response and meet national and international obligations

Fig. 1.0

2. Preparedness Review

2.1 Overview of Work Program

The work program for 2021 associated with the Preparedness is displayed in the below table:

Incident Command System, development, rollout & training.	IRCG Operational Exercise Programme	Scaled / extended Maritime Response Team (MRT) development
Updated Protocol 7 support	Vessel Triage / Ship Casualty / PoR SOP	Management of IMO / OPRC Training Programme
Oil Spill Response, relationship liaison	IRCG MRT Staff development, Inc. ICS Training & Hydra	Intervention & Towage Response log & awareness scanning
Contract Management, Ambipar Response, Exercise support, IMO & ICS Training	IRCG Ops Section PoC, Records & Archives Project	SOLAS Ch. 5 / Ferry SAR Plan Project, project owner

2.2 National and International Training

Throughout 2021, in the area of Preparedness the Coast Guard coordinated and participated the following training programs.

- **EMSA EAS Stockpile** – This European Maritime Safety Agency (EMSA) training was conducted at the Equipment Assistance Service (EAS) stockpile for the North Sea located at the Port of Rotterdam. This extensive stockpile of Current Busters, Speed Sweeps, inflatable storage barges and dispersant is a very well-developed facility in a warehouse and stevedore complex. The training included the practical deployment of all the aforementioned

equipment, apart from dispersant and the course was attended by 16 persons from other EU members states. This course is highly valuable opportunity for CG operational staff to familiarise with the activation, receipt and physical use of the equipment if required by a MS.

- **Hydra Command & Decision-Making suite** – This unique facility based at the Tipperary Fire & Rescue base in Clonmel offers the Hydra Concept of rational decision making and command training. During 2021, the Preparedness Section developed a project programme to pilot the concept within the CG and has created a template for the organisations to collaborate in further courses, specific to the CG and also for CG staff to attend courses run by the PRA's. This training opportunity in based in a simulated, immersive environment, where delegates build rationale in developing a decision. A pilot course was held in Oct. 2021 and was a resounding success with strong appetite from all 12 participants to build upon the experience and establish regular training opportunities for all CG staff.

- **SEA-PT Oil Spill Response practical session** - This valuable training session was conducted as a live beach Shoreline Clean-up Assessment Technique, SCAT exercise followed by a tabletop exercise and presentation to the incident response teams of Galway County Council, supported by SEA-PT, and run by PWS. This exercise afforded an opportunity to CG to present a short brief on the CG, the tiered response approach to pollution response and the National Maritime Oil / HNS Spill Contingency Plan.

- **IMO / OPRC Training** – During 2021, the CG led the delivery through Ambipar Response, of 2 significant training efforts of IMO / OPRC oil spill response training to delegates from the CG, local authorities, and ports. In April three weeks of online training were provided followed by another two weeks of online training in Sept. To enforce and complete this online learning, a 2-week practical training schedule was provided at Howth Yacht Club for all delegates to attend one day. In total in excess of 100 persons received oil spill response training in 2021. Given the logistical and travel restrictions caused by COVID 19, this was an excellent effort by all concerned. Additionally, it is noteworthy the migration of components of the IMO training syllabus to an on-line format represented a first internationally for such training,

2.3 Ship Casualty, Vessel Triage & Place of Refuge Standard Operating Procedure (SOP)

Following the NCP implementation plan and SOP-006, the development of an Ops notices for scenario's regarding Ship casualties, Triage of casualty vessels and integration of SOP-006 was required. This work has continued with the socialisation of the procedure among the CG staff for further refinement and publication in 2022.

- **SOLAS Chapter V / Ferry SAR Cooperation Plan Project** – This project seeks to ensure Ireland has an efficient, resilient, and fit-for-purpose regime in respect to SOLAS 1974 Regulation V/7.3 + MSC/CIRC 1079. (NCSR 4/21) and Marine Notice No 18 of 2011 "Passenger Ship Requirements for Search and Rescue Co-operative Plans under SOLAS". The project has continued to develop having attained 100% success in receipt of internally trading ferry SAR plans. The project will continue with the second annual stakeholder meeting in 2021 with all internally trading vessels and in the rollout of a pilot element targeting domestically trading passenger vessels in a voluntary capacity.

- **Operational Exercise Program** – The continued implementation of the CG Operational Exercise Programme (OEP) through 2021 by way of Exercises Blue Mist and Blue Kingdom, has exercised and enhanced the ICS roll out and associated training regime. The OEP provides a regularised and anticipated opportunity for the branches of the CG to exercise established procedures in response to SAR and Marine pollution scenarios, including maintenance of relationships with other Principal Emergency Services (PESs) and the PRAs. The OEP project and subsequent exercises are sponsored and owned by the Preparedness Section.

- **Exercise Blue Mist** was held on the 15 April 2021 to exercise the Irish Coast Guard's (IRCG) Maritime Response Team (MRT) and the Marine Rescue Coordination Centre (MRCC) Dublin. Members of the IRCG MRT and MRCC Dublin took part in the exercise. The exercise was a virtual tabletop including live communications from all participants. The exercise was a Level

3 national response including the activation and participation of the PRA's and other emergency services. This exercise was overseen and coordinated by Preparedness Section.

- **Exercise Blue Kingdom** was held on the 15 & 16 of September 2021 to exercise the Irish Coast Guard's Marine Rescue Sub Centre (MRSC) Valentia, (IRCG) MRT and the MRCC Dublin. The exercise was split between (25%) live and virtual, tabletop Command (75%) elements. The exercise was conducted over 2 days and included 3 distinct phases including a SAR response, Ships Casualty response and an Offshore and Onshore Marine pollution response. All PRAs participated and the exercise was a successful gathering of all stakeholders and responses as would be expected. The exercise was broad and extensive in its intent and conduct.

- **Exercise Beal Inse** was held on the 17th of June in Dingle Bay. The exercise was established by OTO Preparedness in response to collaboration with the Commissioners of Irish Lights regarding seasonal refresher and capacity building of their crew to undertake the role of On-Scene Coordinator and allow for coordination of multiple SAR assets. The exercise provided an opportunity for the CG project team engaged in tracking devices and drift modeling to be deployed including kayaks, paddles boards and dummies to the water in Dingle Bay, approx. 6 hours before the exercise commencement time. The exercise was attended by the ILV Granuaile, R115, Dingle Delta and Valentia ALB. With live tracking of the search objects hidden from the SMCs at MRSC Valentia, the ILV coordinated a live

multi-asset search while the devices drift track was later mapped against the SARMAP and other modeling examples.



- **Other exercises** – IRCG participated in Exercise Triassic which was established by the Department of the Environment, Climate and Communications (DECC) through the Geoscience Regulation Office (GSRO) and included the Commission for Regulations of Utilities (CRU). This tier 3 exercise consisted of an activation of an MRT to a simulated gas well explosion incident. A CG scaled MRT was established, and a full strategic government response was coordinated by the CG. The exercise proved to be a great success and allowed the MRT to host other agencies and experts within its structure.

2.4 Incident Command System (ICS)

- **ICS Manual rollout** was undertaken during the first half of 2021 and the manual was officially published in June. The manual and detailed appendices provide a clearly defined and dynamic all hazards response system of the CG to follow and to support the integration of others to support the decision-making process.

  This Incident Command System provides the Coast Guard with an internationally developed approach to the proactive management of a major incident regardless of scale. It acts as a guide on covering all key activities involved in managing an incident, provides details on the structure of an efficient incident management team, the responsibility of each functional group within the IMT and describes key roles and activities that should be carried out throughout a response.

The ICS establishes a preparedness framework that allows escalation and integration of resources commensurate with the needs of an incident. The three levels/tiers (simply described as 1/2/3 and local, regional, and national/international) help to define capability and responsibilities at discrete levels.

Escalation through the tiers should be as seamless as possible, including the integration of command and control as increased number of organisations are involved, the system should allow for the coordinated transfer of incident management as required.
This Incident Command System is a key component means by which we implement SAR and Pollution response policy in Ireland. It is the mechanism by which the IRCG will activate and mobilise the Marine Response Team (MRT) and scale resources accordingly to an incident.

- **ICS Training** was developed specifically / bespoke for the IRCG and a suite of training courses across 3 levels was delivered and provided for all CG staff. This training included ICS 100 and 200 online courses and the ICS 300 face to face, 3-day course. This bespoke level of training will over time build a culture of emergency response where the approach is systematic and preplanned. All IRCG fulltime time staff were enrolled in ICS 100 and 200 online courses in 2021, while ICS 300 was targeted at on call staff along with other staff wishing to participate. The continued roll out of ICS will see other sections of the Department of Transport and CGU&S Section undertake this training in 2022 and beyond.

- **Hydra Suite** – Throughout 2021, Preparedness Section has collaborated with Tipperary Fire & Rescue Service in developing a CG specific command and decision-making course for all CG full time staff. This culminated with a one pilot course for senior management to test the concept and offer feedback on how to further develop a two-day decision-making course.

3. Response Review

3.1 Management of the National Pollution Stockpile

The DESMI Octopus Pollution Response Equipment was commissioned in Howth Harbour 12th to 16th Jul 2021. Certified familiarisation and training to IRCG staff and contractors was delivered and it was ensured that assigned warranties and bonds post commissioning were in-place for the equipment. Following commissioning the two DESMI Octopus Skimmers were added to the National Pollution Response Stockpile.

The yearly programme of maintenance and servicing was implemented in accordance with agreed contract management arrangements. This included quarterly equipment maintenance schedules carried out at the three stockpile locations. IRCG carried out quality assurance and verification of maintenance arrangements via quarterly Framework Meetings with Pollution Response Contractors – PWS and the carrying out an annual silent activation of call out test arrangements for the contractors.

Deployment of DESMI “Octopus” system during commissioning.

3.2 Environmental (Pollution) Monitoring within Irelands EEZ

Ireland completed annual BONN reporting requirements as per its BONN Treaty commitment. This work supports the BONN Treaty Annual Aerial Surveillance data gathering and annual reported statistics for Member States.

Primary Aerial Monitoring systems for our EEZ are EMSA Satellite Monitoring and Coast Guard Helicopters, with assistance from the Irish Air Corps and Naval Service, IRCG ensured that reported incidents of pollution either via EMSA’s CleanSeaNet service or via visual sightings were verified.

IRCG carried out an internal Operational SWOT Analysis of Environmental (Pollution) Monitoring within Ireland’s EEZ. This is an ongoing project and will carry forward to 2022 with assistance from CG partner agencies and the BONN agreement States.

To maintain coordination and cooperation in aerial surveillance IRCG carried out quarterly meetings with Air Corps regarding protocols and response actions. Additional enhancements were agreed with the annual programme of activity. In addition, agreed new IRCG tasking procedures and reporting of BONN reporting structures to ensure delivery of BONN reporting structures, formats and statistics were compiled as per required Treaty commitments.

The Aer Corps, facilitated by IRCG, participated in SuperCEPCO flight in Norway as part of Ireland's BONN Commitment. This exercise facilitated expert exchange and training for Air Corps personnel in the maritime pollution sector.

3.3 BONN Aerial Surveillance requirements

IRCG continues to investigate enhancing surveillance capability through UAVs and/or RPAS by cooperation with EMSA and Member States in the exchange of information and engagement with research activities in both fields.

3.4 Kinsale Energy Decommissioning 2019-2025

In June 2018, Kinsale Energy Ltd (KEL) commenced the decommissioning of the facilities in the Kinsale Head and Seven Heads gas fields. The offshore decommissioning activities commenced in July 2020 and are expected to be completed by 2023. IRCG PRP are the main point of contact for all interactions between KEL and Department.

IRCG held weekly information meetings between KEL and PRP IRCG and MSO. All submitted documentation in respect of all Oil Spill and HNS plans was reviewed and IRCG provided comment and recommended amendments to KEL. This review included emergency response plans.

IRCG coordinated and facilitated two emergency response exercises between KEL, KEL Contractors and IRCG on 5th and 12th March 2021 to exercise/prove emergency response plans.

Daily and weekly reporting structures and formats in respect of Person on Board, work progress and work plans were set up for MRCC/MRSC and IRCG

Cross Government and Inter Agency cooperation and coordination was initiated and facilitated by IRCG between KEL, MSO, CRU, HSA and IRCG



Some of the resources supporting the decommissioning project, Stena Spey & Heermea Thialf

3.5 Participation at BONN and EMSA meetings and workshops

- Contracting party coordination and support the Working Group on Operational, Technical and Scientific Questions Concerning Counter-Pollution Activities (OTSOPA).
- Review and reporting on impact of OTSOPA 20/21 work program on PRP planning
- Bonn MARPOL VI compliance arrangements technical working group support.
- Support of on-going engagement and working groups with the agreement.

Coast Guard International exchange 2021 –

Meeting	Date
OTSOPA	25th to 27th May
BONN	22nd and 23rd Sept
Pollution Response Services User Group 11th PRS-User Group	13th Oct
EMSA 15th CTG MPPR	14TH Oct
MARPOL Annex VI	02 Feb to 6th Feb, 03rd Jun
MARPOL Annex VI Workshop	13th Sept
EMSA Aerial Surveillance Expert Assessment Panel	15th Apr
RPAS EMSA	30th Oct and 1st Oct
EMSA Common Operating Procedures Manual	20th Apr 16th Jun 30th Sept
WestMOPCo	14th Apr
BONN 2021	18th May

3.6 EMSA response vessel (Cork) contract renewal 2022

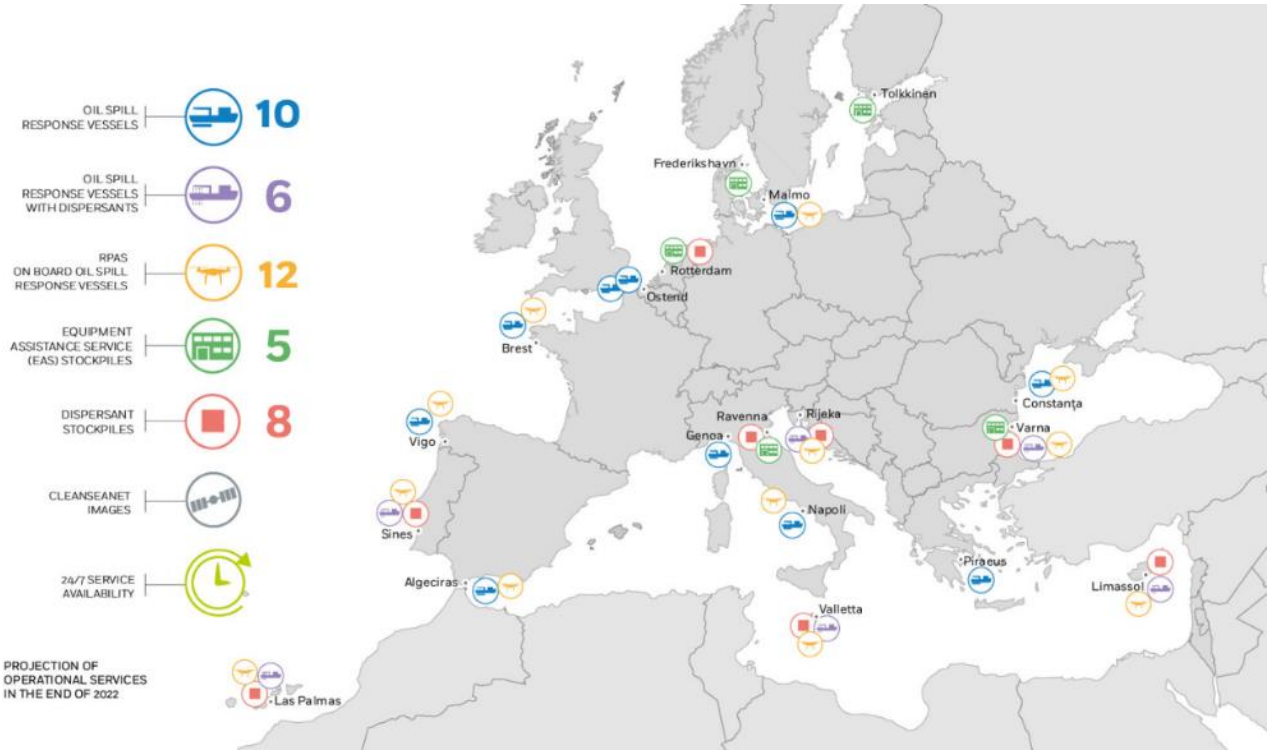
EMSA has established a network of stand-by oil spill response vessels through contracts with commercial vessel operators. EMSA's contracted vessels have been specifically adapted for oil spill response operations and are on stand-by, carrying out their usual commercial activities.

Prior to 2013 EMSA had 2 vessels contracted within Ireland's EEZ. Post 2013 this arrangement was adjusted to one contract and following Brexit the contractor indicated that they were unwilling to adhere to EU regulations and solutions offered by EMSA.

IRCG upon request supported EMSA in scoping/sourcing likely commercial operators and general market analysis of the Irish context.

Following 2021 no EMSA pollution Response Vessel is available within Ireland's EEZ. The nearest response vessel(s) they can be sourced from EMSA are situated at Brest France, followed by Ostend Belgium and Vigo Spain.

Ireland continues to avail of EMSA Satellite imagery and EMSA's Equipment Assistance Service can be mobilised from Rotterdam.



EMSA Equipment Assistance Service arrangements across member states.

3.7 Pollution Reports (POLREPs).

Number of incidents reported per Rescue Coordination Centre for the years 2020-2021.

Coast Guard SAR Co-ordinator Incidents reported to Coast Guard		**MRCC Dublin**	**MRSC Valentia**	**MRSC Malin**	**Total**
Pollution	**2021**	10	17	1	28
Pollution	**2020**	14	7	7	28

EMSA CleanseasNet	**MRCC Dublin**	**MRSC Valentia**	**MRSC Malin**	**Total**
2021	33	19	0	52
2020	15	13	2	30

3.8 Other activities

IRCG participated in SpaceEx Launch Program Meeting and deliberations with Aer Corps, Military Attachés, US Coast Guard, NASA re launch and recovery site off southwest coast Ireland. Agreed procedures for recovery of crashed aircraft.

IRCG PRP Section took part in research project with partners Maynooth University, Airbus and Aer Corps to enhance developments in the RPAS arena specifically in MARPOL Annex VI. This data collection will become a future reporting area for Ireland within the BONN Agreement.

IRCG attended RPAS Demonstration Newcastle Co Wicklow 3rd June with Limerick University.

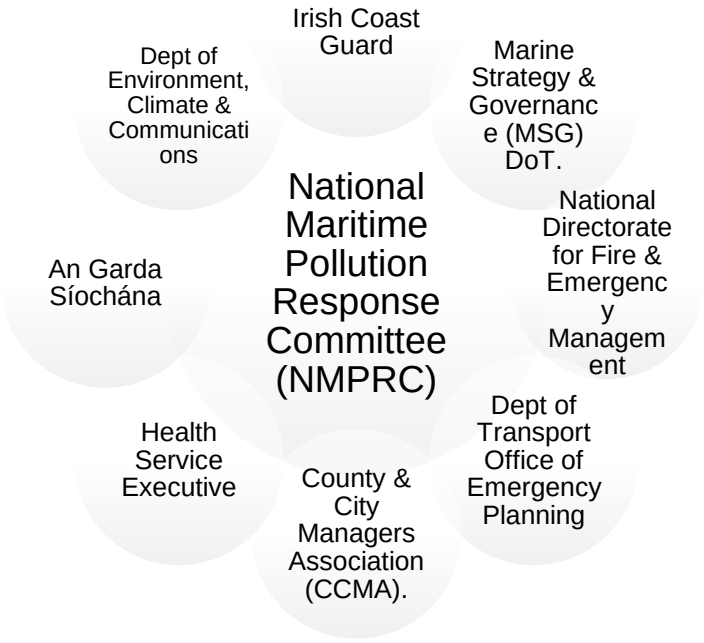
4. Planning Review

4.1 National Maritime Pollution Response Committee

The NCP was published in June 2020. In compliance with the ORPC Convention, and as part of the implementation plan for the NCP, a National Maritime Pollution Response Committee (NMPRC) was established. The Committee provides strategic coordination, guidance and leadership for the implementation and review of the NCP. The members of the Committee are drawn from the primary stakeholders (i.e. the Principal Response Agencies under the Major Emergency Management (MEM) Framework), as well as representatives from supporting governmental bodies as identified by IRCG. The committee held its first meeting in March 2021. The purpose of the committee is to implement the NCP and identify and gaps in Ireland's response for pollution and ship casualties. There were two meeting held in 2021. The NMPRC supports the work of the Consultative National Maritime Pollution Response Forum (see under).

The key topics for the meetings were:

- National Maritime Oil/HNS Spill Contingency Plan implementation and gap analysis.
- The development of an online portal for submitting Oil/HNS Spill Contingency Plans.
- Update on IRCG progress with plan reviews.
- Update on training and exercises carried out by IRCG over the previous 12 months.
- Update on EMSA Response Vessel contract renewal for the Atlantic coast.
- Gaps identified in the national response.



4.2 Consultative National Maritime Pollution Response Forum

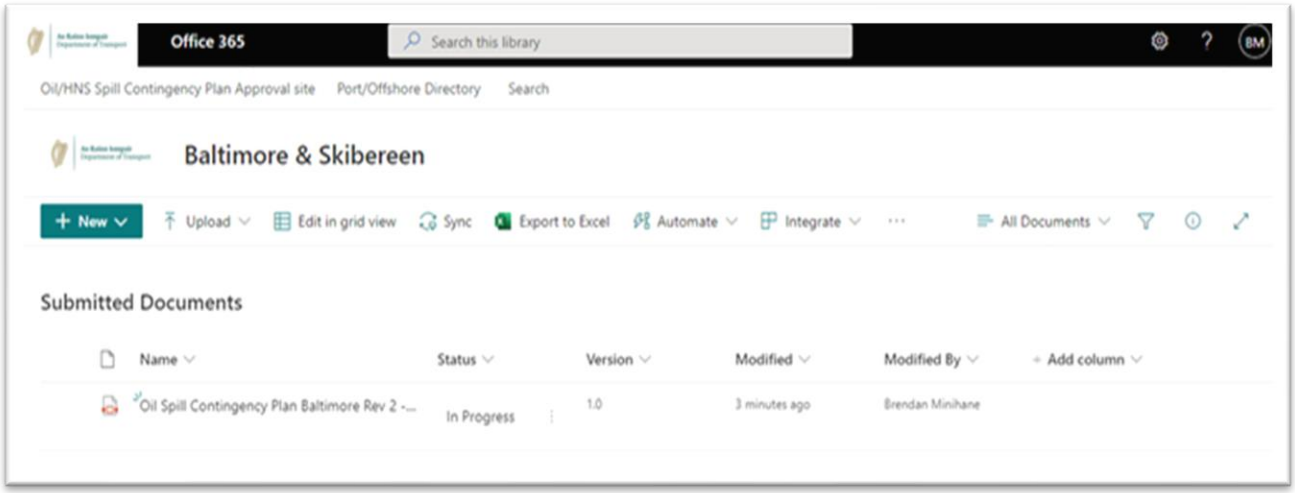
The Consultative National Maritime Pollution Response Forum is a group of external stakeholders, including private sector and non-governmental organisations. This group is convened by the IRCG on an ad hoc basis but typically closely following meetings of the NMPRC. The Forum enables IRCG to consider feedback from non-statutory stakeholders concerning relevant issues arising from NMPRC's discussions and implementation of the NCP. The inaugural meeting was held in April 2021 with 26 members in attendance.

The key topics for the inaugural meeting were:

- Agreement of the Terms of References and Key Performance Indicators
- National Maritime Oil/HNS Spill Contingency Plan implementation and gap analysis
- The development of an online portal for submitting Oil/HNS Spill Contingency Plans
- Update on IRCG progress with plan reviews
- Update on training and exercises carried out by IRCG over the previous 12 months
- Potential Work Program for the Forum

4.3 Oil/HNS Spill Contingency Plan Portal

In accordance with legislation, coastal local authorities, certain offshore operators, and Ports must submit an Oil Spill Contingency Plans for approval by the Department. In order to make the process more efficient and reduce costs, an electronic solution was developed to facilitate the submission and approval of the plans. The project commenced in Q4 2020 and was completed in Q3 2021. There is now a robust online portal fit for purpose for stakeholders to submit Oil/HNS Spill Contingency Plans.



4.4 Oil/HNS Spill Contingency Plans – progress to date

The NCP and associated SOPs gives guidelines for stakeholders on the content on writing an Oil/HNS Spill Contingency plan. A full review of Oil/HNS Spill Contingency Plan submission process and legacy issues was carried out in 2021. It was found that there were a number of plans submitted before the publication of the NCP which were not yet reviewed. A plan was put in place to review the oldest plans first.

Using the guidelines from the NCP and associated SOP's the plans were reviewed and comments were sent to the stakeholders to bring all the older plans under review in line with the NCP. The table below shows the status of stakeholder plans at the end of 2021. Engagement with stakeholders gave an indication of the number of new plans that were expected in 2022. Reminder letters have been sent to stakeholders that never submitted plans in the past. Good

progress was made in reviewing plans as well as confirming with the stakeholders that new plans should be in line with the National Maritime Oil/HNS Spill Contingency Plan guidelines.

	Approved	**Submitted waiting approval**	**Expired**	**Not Submitted**	**Total**	**Under Review 2021**
Local Authorities	1	9	6	5	21	6
Port & Harbours	2	6	0	11	19	6
Sea Fisheries	0	1	5	0	6	1
Oil Installations	1	0	0	2	3	0
Offshore	2	0	0	1	3	1
Total	**6**	**16**	**11**	**19**	**52**	**14**

4.5 International Oil Pollution Compensation Fund (IOPC)

Ireland is represented by IRCG on the International Oil Pollution Compensation Fund. The IOPC Funds provide financial compensation for oil pollution damage that occurs in Member States, resulting from spills of persistent oil from tankers. The IOPC Funds are financed by contributions levied on any entity that has received in the relevant calendar year more than 150 000 tonnes of contributing oil (i.e., crude and/or heavy fuel oil) in ports or terminal installations in a Member State, after carriage by sea. Contributions are paid by the individual contributors directly to the Funds. IRCG attends sessions of the IOPC Funds Governing bodies and votes on Ireland's behalf.

4.6 Offshore Renewable Energy Installations (OREI)

IRCG role relating to Offshore Renewable Energy Installations is Search & Rescue, Pollution & Salvage and Ship Casualties. In 2021 six OREI companies met with IRCG seeking advice and guidance on possible OREI projects around the Irish coastline. IRCG also met on several occasions with UK Offshore Liaison Officers to exchange knowledge on guidance documents with a view to publishing our own guidance for OREI companies operating in Ireland. IRCG also attend the Offshore Regulators Group's meeting which provided a platform to exchange information with other Irish regulators involved with OREI projects in Ireland. IRCG continues to collaborate with other Divisions within the Irish Maritime Directorate in working towards appropriate guidance documentation for Industry in terms of ORE. This is supported by exchange and collaboration with HM Coastguard's Policy and Standards Section-Offshore Energy Liaison Office in best practice in the area of OREI guidance. Future work for IRCG will include Oil/HNS Spill Contingency Plan and Emergency Response Plan reviews for OREI projects within Ireland's EEZ. Every project will require a plan approved by IRCG. Search & Rescue and Ship Casualty exercises and training within the OREIs will be more frequent as the projects come online.

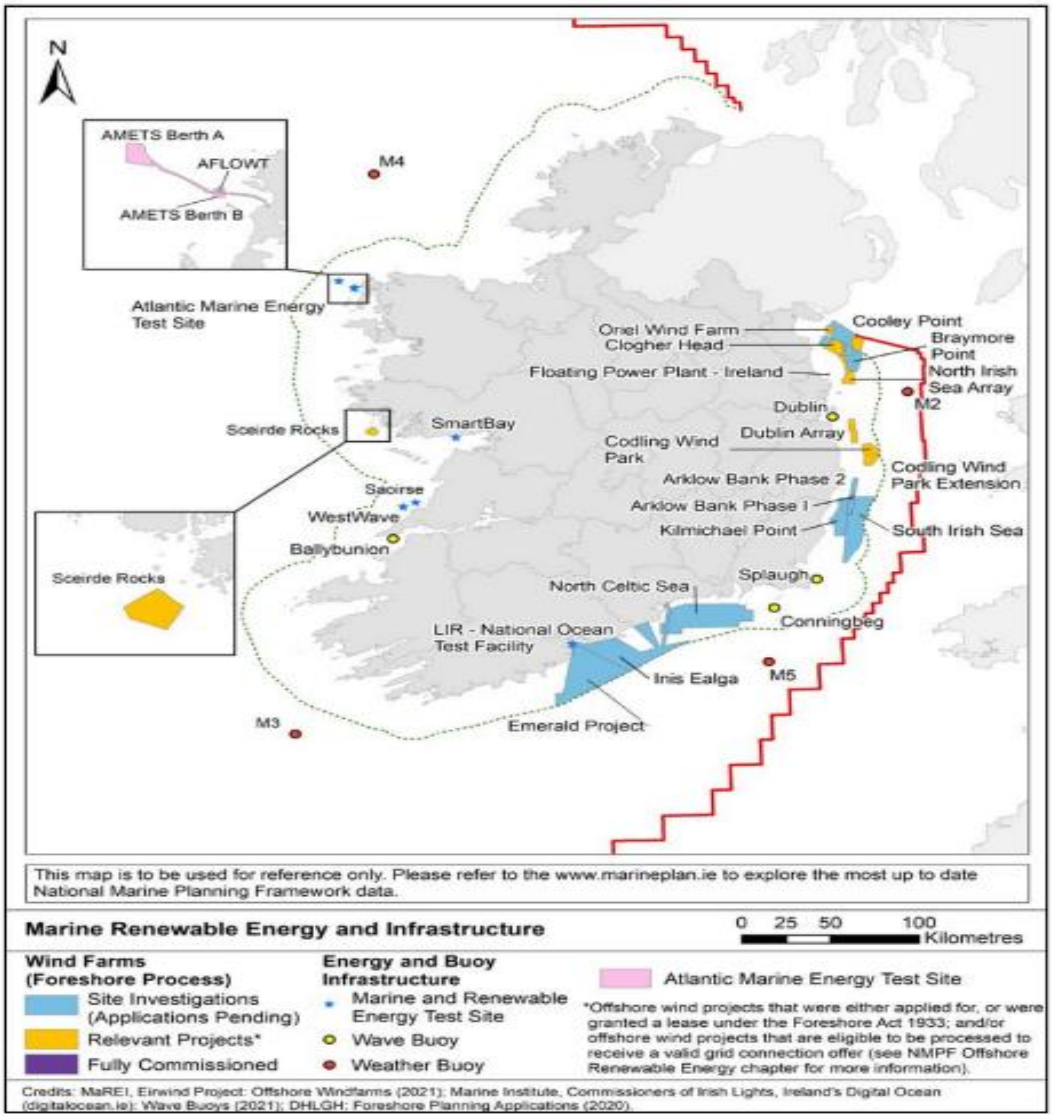
4.7 OREI Relevant projects

According to the Department of the Environment, Climate and Communications, there are seven 'Relevant Projects' – these 'Relevant Projects' are offshore wind farm projects (six off the east coast and one off the west coast) which have applied for over 3,000MW in total and are currently in the formal grid connection process with Eirgrid. They have not yet undergone planning.

The Relevant Projects are:

• Oriel Wind Park (located in the Irish Sea off the coast of County Louth, to the East of Dundalk Bay).
• Innogy Renewables (two projects - Bray and Kish Banks, located 10km from the coast of Dublin and Wicklow counties).
• Codling Wind Park (two projects - Codling I and Codling II, located 13km from the coast between Greystones and Wicklow).
• Fuinneamh Sceirde Teoranta, (Skerd Rocks, located some 5km and 8km off the coast of Carna in County Galway); and
• North Irish Sea Array Ltd. (located between 7km and 17km off the coast of the Dublin, Meath, and Louth counties.

A map showing OREI projects that are currently applying for licenses within Ireland EEZ.



4.8 Maritime Area Planning Act 2021

The Maritime Area Planning Act 2021 provides the legislative framework for a new streamlined development consent process for activities in the maritime area including offshore renewable energy projects. The Act will also establish a new body, the Maritime Area Regulatory Authority to undertake certain consenting and enforcement functions in the new regime. Enactment and

implementation of the Act will help Ireland to reach its climate action and renewable energy targets.

The aim of the Act is to fix the lack of cohesion in Ireland's marine planning consent regimes, which includes gaps and duplication across various consent processes (foreshore, planning and environment). To achieve this, the Act proposes to establish a new legal framework for the maritime area and replace the existing foreshore, planning and environmental processes with a single streamlined consent process. The Act is an important part of broader developments in marine management reform including Ireland's National Marine Planning Framework, launched on 1 July 2021. It is also a key piece of legislation which is needed to help Ireland reach its climate action and renewable energy targets by enabling the development of an offshore renewable energy industry

4.9 Wreck & Salvage – update procedures

Persons making salvage attempts on wrecks and historical wrecks in the Irish EEZ are required to submit salvage and Oil/HNS Spill Contingency Plans to the IRCG. In response to a recent upsurge in such activities guidelines for salvage operators are being updated by the IRCG in consultation with other government departments and the Attorney General's Office.

4.10 Ship to Ship Transfer Operations – Applications and review

Ireland does not encourage STS operations within its EEZ. However, in special circumstances, Ship to Ship Transfer operations are required when all other options are not possible. A review of the current guidelines is ongoing and will continue into 2022. The new guidelines will take into account Port of Refuge situations, vessel requesting to transfer stores/provisions at anchor and Offshore Renewable Energy Installation (OREI) vessels. In 2021 there were several STS applications for the transfer of oil between vessels involved in Kinsale decommissioning project.

4.11 FV Aztec Incident and Review

On 11th January the fishing vessel Aztec floundered off Duncannon in Port of Waterford area of jurisdiction. Salvors were appointed and initially planned on raising the vessel the following day.

IRCG gave advice to the Harbour Master of the Port of Waterford regarding the requirement for Salvage Plans and Oil/HNS Spill Contingency Plan before the lifting operation could take place. Several meetings were held between all stakeholders which resulted in the postponement of the operation until appropriate plans were reviewed and approved and the correct vessel and equipment could be sourced. Several different versions of Salvage Plans, Oil/HNS Spill Contingency Plans, Waste Management Plans, Towing Plan & Lifting Plans were produced and sent to IRCG for review. The vessel was successfully raised on 30th January and towed to New Ross boatyard. A review of the incident was held in March 2021 highlighting what went well and what could be improved.

4.12 IMD Strategy IMO III Code Action Plan Group

The International Maritime Organization's Instruments Implementation Code (III Code) entered into force and the associated Member State Audit Scheme (IMSAS) became mandatory as of 1 January 2016. The Audit Scheme was adopted in order to determine the extent to which IMO Member States were giving full and complete effect their obligations and responsibilities as Contracting Governments, Flag States, Coastal States and Port States, as required in several IMO treaty instruments. The group is made up of representatives of IRCG, MSO & MS&G. The group meets regularly to discuss the upcoming IMSAS Audit which is scheduled for November 2024.

4.13 Legislative Pipeline.

The Irish Maritime Directorate (IMD) has developed a 10-year legislative work programme for the period 2019-2029 which sets out the maritime legislative priorities. This work programme includes the required international convention elements which have been identified within the national gap analysis as priorities in the areas of preparedness and response. Including accession to the Protocol on Preparedness, Response and Co-operation to Pollution Incidents by Hazardous and Noxious Substances, 2000, the International Convention on Liability and Compensation for Damage in Connection with the Carriage of Hazardous and Noxious Substances by Sea, 2010 and the Nairobi International Convention on the Removal of Wrecks 2007. This is a live and evolving document which is reviewed and updated at mid-year and annually to take account of changing priorities based on an analysis of emerging needs. This document is monitored by a Legislative Working Group and a report was submitted to the Minister in March 2022 setting out progress on the programme from 2019 to 2021.

5. Commission for the Regulations of Utilities (CRU)- update.

5.1 European Union Offshore Oil and Gas Authorities Group ("EUOAG")

The European Union Offshore Oil and Gas Authorities Group ("EUOAG") is a forum for the exchange of information and expertise between National Authorities, Third Countries, Industrial Associations, the European Commission, and other stakeholders on all issues relating to major accident prevention and response in offshore oil and gas operations. Member States' authorities responsible for the regulatory oversight of offshore oil and gas activities and related policy areas are formal members of the Group, which was established in 2012. The EUOAG promotes and facilitates the application of best practices and high safety standards in offshore oil and gas operations worldwide.

Within Ireland, the relevant authorities responsible for regulatory oversight include DECC, IRCG and CRU. Representation and participation at meetings and workshops are adjusted as per topic and remit of the relevant authority. The IRCG and CRU have attended workshops over the past year, especially on the topic of External Emergency Response Plans. IRCG has provided input at EUOAG regarding Irish response capabilities and emergency response exercise. Through participation, both IRCG and CRU have contributed towards the EUOAG's progression of a Guidance Document for External Emergency Response Plans throughout the past year which has been recently issued by the European Commission (External Emergency Response Plans Guidance for EU Member States, Mike Sharman, 12-2021). The inter-agency collaboration between IRCG and CRU is one of the outputs of the close working relationship which has existed since the establishment of the CRU's Petroleum Safety team, and in particular since the creation of the inter-agency Memorandum of Understanding.

CRU attended the annual ordinary and plenary meetings in March 2022. Topics of discussion included country updates from the Member States, especially in relation to any major accidents that may have occurred and to challenges being faced by the COVID 19 pandemic. A key update

was also provided in relation to a decommissioning study that had been completed ("Study on decommissioning of offshore oil and gas installations: a technical, legal and political analysis"). It was proposed to address some of the significant challenges faced with the increased decommissioning of oil and gas infrastructure in the EU through future legislation, possibility of a new directive or an update to the previous Offshore Safety Directive. A further meeting is to be organised for further discussion on this topic, and on some of the other points discussed during the meetings. For example, determining a common format for sharing of information on major hazard indicators by the operators and owners of offshore oil and gas installations and a common format for the publication of the information on major hazard indicators by the Member States.

6. Exercise Triassic-Dept of the Environment, Climate and Communications.

The Minister for the Environment, Climate and Communications is the licensing authority for oil and natural gas exploration and extraction in Ireland and any activities, such as well works, seismic surveying or decommissioning, carried out under petroleum authorisations (licenses, leases) require the consent of the Minister. This licensing function is exercised through the GSRO in DECC, however other key regulatory bodies also have responsibility for various aspects of such activities.

Ireland's Programme for Government contains a commitment to end the issuing of new licenses for the exploration and extraction of gas on the same basis as the decision taken in 2019 by the previous Government (in relation to oil exploration and extraction). This commitment was given statutory effect by the Climate Action and Low Carbon Development (Amendment) Act 2021. Existing authorisations are not affected by this change. Holders of existing authorisations can continue to apply to progress through the standard licensing lifecycle stages towards a natural conclusion, which may include expiry, relinquishment, or production. Any such applications, or applications to undertake offshore activities under an authorisation, are subject to Ministerial consent, and will continue to be required to meet environmental, technical, and financial criteria as appropriate.

In December 2021 IRCG, CRU and DECC carried out "Exercise Triassic", a multi-agency Incident Management Exercise (IME), which was organised and facilitated by Ambipar Response Ltd and Dynamic Well Control Inc While the licensing function for activities under petroleum authorisations is exercised by DECC, other key regulatory bodies, such as IRCG and CRU, have responsibility for various aspects of such activities. The purpose of running the exercise was to test the interoperability of the relevant organisations in the response to an offshore oil and gas incident of national significance, given the various areas of responsibility of the different organisations.

The scenario for Exercise Triassic was an uncontrollable gas leak from a well in the fictitious "Carrick Field" off the Mayo coast, operated by Carrick Gas, a fictitious company. To ensure there was sufficient involvement of all participating organisations, the exercise commenced on Day 3 of the response. In the lead up to the exercise participants were supplied an Incident Status Summary form for Days 1 and 2 of the response and an Incident Action Plan for Day 3 of the response from Carrick Gas's Incident Management Team in order to develop an element of situational awareness. Throughout the exercise a series of injects were delivered into the participating organisations to aid the continuous development of the exercise, achieve the exercise objectives and add an element of realism. All additional involvement from third-party organisations were simulated through the Simcell.

The Irish Coast Guard activated a scaled virtual Marine Response Team (MRT) and DECC and CRU provided specialist advice. The exercise was run remotely, and this methodology of incident management proved to be effective and efficient in sharing information, attending meetings throughout the exercise, and enhancing interoperability.

Overall, the exercise was found to be very beneficial in enhancing the national response capability of Ireland to manage the response to such an incident. The exercise showed that all organisations demonstrated a high level of capability and competency in managing the response to the incident. It is planned to hold similar exercises in future, with participation from additional relevant regulatory bodies, and with varied scenarios testing different aspects of the regulatory functions and responsibilities of the relevant organisations.

An Roinn Iompair
Department of Transport