WEST INDIA AND MILLWALL DOCK SYSTEM

Oil Spill Contingency Plan

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GLOSSARY	
BEIS	Department for Business, Innovation and Skills
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
EG	Environment Group
HFO	Heavy Fuel Oil
HMRC	Her Majesty's Revenue and Customs
HWS	High Water Springs
IMO	International Maritime Organisation
IMT	Incident Management Team
JNCC	Joint Nature Conservation Committee
LA	Local Authority
LFO	Light Fuel Oil
LWS	Low Water Springs
MCA	Maritime and Coastguard Agency
MCR	Marine Control Room
MFO	Medium Fuel Oil
MGO	Marine Gas Oil
MMO	Marine Management Organisation
MRC	Marine Response Centre
CGOC	Coast Guard Operation Control
MSMS	Marine Safety Management System
NCP	National Contingency Plan
NE	Natural England
OMT	Oil Spill Management Team
OPRC	Oil Pollution Preparedness Response and Co-operation Convention
OSCP	Oil Spill Contingency Plan
POB	Persons On Board
SCU	Salvage Control Unit
TRG	Tactical Response Group
SSSI	Site of Special Scientific Interest
UKPIA	United Kingdom Petroleum Industry Association

ORGANISATION	COPY NUMBER
Maritime and Coastguard Agency (CPSO)	
Environment Agency	
Marine Management Organisation	
Natural England	
London Borough of Tower Hamlets	
RSPB	
Canal and River Trust • Harbour Master • Marine Control • Milton Keynes	
Adler and Allan	

Amendment state	
Amendment	**Date**

SECTION 1: INTRODUCTION AND POLICY

1.1 PURPOSE OF THIS PLAN

This Oil Spill Contingency Plan (OSCP) guides the Canal & River Trust's (The Trust) West India and Millwall Docks (The System) personnel through the processes required to manage an oil spill arising from operations within or approaching the Trust's jurisdiction.

The requirement to have an OSCP for Harbours, Ports and Oil Handling Terminals in and around UK waters is formalised by the Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998, SI 1998 No. 1056.

These Regulations are subject to ongoing Guidance Notes from the Maritime and Coastguard Agency (MCA), all of which contribute to the development and maintenance of this Plan.

The Regulations implement the International Convention on Oil Pollution Preparedness, Response and Co-operation, 1990 (OPRC, 1990). This convention, adopted by the International Maritime Organisation (IMO), aims to mitigate the consequences of major oil pollution incidents involving, in particular, ships, offshore units, seaports and oil handling facilities.

Consultation

Statutory consultation has been undertaken with

- Marine Management Organisation (MMO)
- Environment Agency (EA)
- Natural England
- London Borough of Tower Hamlets
- Port of London Authority (PLA)

Regular users of the Docks have been consulted, to both test the robustness of the Plan and to ensure and assure the promulgation of Best Practice.

Reference of this Plan in made in the Marine Safety Management System for west India and Millwall Docks, specifically Part 3, Harbour Master Directions.

1.2 USE OF THIS PLAN

This Plan covers operations, either maritime or onshore, within the area of the Trust's jurisdiction at West India and Millwall Docks. The Plan provides a procedure for initiating an appropriate oil spill response in the event of an incident.

It details a tiered response strategy that is in accordance with legislative requirements and takes into account the spill risk associated with Dock operations, the hydrographic conditions and the environmental sensitivity of the area.

1.3 AREA OF OPERATION, DESCRIPTION OF FACILITIES AND BUNKERING STRATEGY

The area of operation is shown in Annex A.

The seaward limit of this area is the outside of the outer lock gate, at the junction with the River Thames.

The West India and Millwall Dock system is owned and managed by the Trust. Day-today management is co-ordinated at the local offices at West India Dock pier head, Marine Control. The majority of dock walls within the system are owned by the Trust. Smaller areas are owned by

third parties including the Canary Wharf Group and other private developers. The dock system comprises the following areas:

- West India Dock - North Dock
- West India Dock - Middle Dock
- West India Dock - South Dock
- Poplar Dock, location of Poplar Dock Marina
- Blackwall Basin, location of Blackwall Basin Marina
- Millwall Inner Dock
- Millwall Outer Dock

Access to all areas is through the main entrance lock at the eastern end of South Dock West India Lock, with all dock areas interconnected by various cuttings and passages.

A variety of craft use the dock system, including private leisure craft, cruise liners up to 15,000 GRT, naval vessels (up to 9000 GRT), Tall Ships, super yachts and construction traffic carrying aggregate and other materials.

All vessels are required to pre-book arrivals/departures

Due process is defined in the West India and Millwall Dock System Marine Safety Management System (MSMS), Part 3, Harbour Master Directions.

There are long-term small craft moorings, which typically cater for vessels up to 38m, available in various dock areas. The bigger marinas are in Poplar Dock and Blackwall Basin.

Blackwall Basin marina is owned by the Trust and Poplar Dock marina is owned by Aqua Visa (latterly British Waterways Marinas Ltd).

Located in other dock sites are a floating restaurant, a floating restaurant/private function Dutch barge, various other businesses located on Dutch barges and other vessels, the Docklands Scout Project headquarters ship and various accommodation/office barges and floating plant for use in construction work. Part of the South Dock water space and the lock side land is licensed by the Trust to the Docklands Scout Project for use in connection with their activities.

The Millwall Outer Dock water space is similarly licensed to the Docklands Sailing and Water sports Centre for their water-based activities, managed from their headquarters building in that dock.

In order to reduce the possible effects from oil pollution all lease holders have conditions of contract to limit pollution.

1.4 IDENTIFICATION OF ROLES AND RESPONSIBILITIES

Within the UK, there is an adopted structure and procedure for responding to marine oil spills, which clearly defines the roles and responsibilities of industry, central and local government (including environmental agencies) and competent harbour authorities. Each statutory body has a designated area of jurisdiction within zones extending from the High Water Mark to 200 nautical miles or the UK Territorial Limit.

The competent national authority designated to oversee all matters pertaining to the OPRC Convention under the Salvage and Pollution Act 1994 is the MCA.

1.4.1 Statutory Jurisdiction

	Pollution to Clean-up	Responsibility
Outside Canal and River Trust (within UK EEZ)	On water	MCA/PLA
	Shoreline (including land exposed by falling tide)	EA, local authority/PLA
Within Canal and River Trust	On water	Canal and River Trust West India and Millwall Docks
	Jetties/wharves/structures	Canal and River Trust West India and Millwall Docks
	Beach/shoreline owned by Canal and River Trust	Canal and River Trust West India and Millwall Docks
	Shoreline (including land exposed by falling tide)	EA, London Borough of Tower Hamlets

In the event of an oil spill incident within its jurisdiction, the Trust will be responsible for the overall co-ordination of the spill response.

1.4.2 Vessels in Transit

The statutory duty for reporting and dealing with pollution from any vessel within the Docks lies with the Master and vessel owners, the reporting and response to any pollution incident is to be co-ordinated through this Plan.

The roles and responsibilities of all authorities requiring notification in the event of a spill are at Section 4.

1.5 SCOPE OF THIS PLAN

This Plan is designed to initiate an appropriate response to any oil spill caused by or during operations associated with safe passage of vessels to or from, or located within, the Trust's jurisdiction within the Docks.

It also covers the response to any spillage arising from onshore operations that impact on the Trust's area of jurisdiction.

The Plan details a tiered response strategy that is in accordance with UK legislative requirements and takes into account the spill risk associated with Dock operations; the nature of the hydrocarbons that could be spilt; the prevailing meteorological and hydrographical conditions and the environmental sensitivity of the surrounding areas.

The Plan details the Tier 1 response available from the Trust, which is relevant to the perceived risk associated with normal operations, as well as a mechanism for calling out Tier 2 Responders in the event of an abnormal incident or major accident requiring the Trust's involvement.

The response strategy within the Trust's Plan has been developed taking into account the spill risks and possible sources of spillage associated with the operations taking place within the Trust's jurisdictional area, in 3 sections:.

Part 1: Strategy Plan

Describes the statutory requirements, purpose and scope of the Plan, including the geographical coverage. It shows the relationship of the Plan to the National Contingency Plan for Marine Pollution from Shipping and Offshore Installations (NCP) and plans of local organisations. Also included are perceived risks, and the Incident Response Organisation and responsibilities of individuals for defined categories of spill.

Part 2: Action Plan

Sets out the emergency procedures that allow rapid mobilisation of resources and an early response to the situation.

Part 3: Data Directory

Contains supplementary information relevant to the performance of the Plan.

1.6 INTERFACING WITH LOCAL & NATIONAL OIL SPILL CONTINGENCY PLANNING

1.6.1 The Trust's OSCP

The Trust's Plan deals with the marine response to an oil spill. Once any oil impacts the shoreline, there is a seamless transition from this Plan (the Trust's OSCP) to the National Contingency Plan.

In the event of actual or threatened shoreline impact, the emergency plan of the London Borough of Tower Hamlets will be implemented. The level of activation will be dictated by the incident classification.

1.6.3 National Contingency Plan (NCP)

In the event of an oil spill that calls for a Tier 3 response, the MCA may decide to implement the NCP. In this event, the MCA will take control of at-sea counter pollution measures from their own Marine Response Centre (MRC).

Any formal hand-over of responsibility to the MCA for dealing with an oil pollution incident is to be formally documented. If required, the Trust's oil spill response resources and facilities are to be made available to the MCA.

A Tactical Response Group (TRG) will be established and will exercise overall co-ordination of the shoreline clean-up in accordance with the procedures and guidance given in the NCP. The appropriate members of the Oil Spill Management Team will re-deploy to the TRG and/or the MCA MRC as required.

NCP: https://www.gov.uk/government/publications/national-contingency-planncp

1.7 PLAN CUSTODIAN

The responsibility for the upkeep, amendment and review of this Plan has been assigned to the Harbour Master. It is their responsibility to ensure that the Plan is kept up to date and reviewed in accordance with the legislative requirements

1.8 CLASSIFICATION OF OIL SPILLS

Oil spills will be categorised in accordance with the internationally recognised three Tier classification system:

Tier 1
Small operational spillages which can be controlled by Canal and River Trust West India and Millwall Docks
Tier 2
Medium sized spillages into the water column which require the immediate deployment of the Tier 2 contractor as described later in this Plan and subsequently a substantial commitment of the Plan resources and including regional assistance.
Tier 3
Large spillages which exceed the full resources of the Plan require national assistance and the implementation of the NCP and the formation of a Shoreline Response Centre (TRG).

Irrespective of the spill classification, Form CG77 POLREP will be completed and submitted to the MCA and London Coastguard (HMCG), amongst others, by the Harbour Master or their appointed deputy for doubtful, probable and confirmed oil spills that occur within the Trust's jurisdiction.

1.9 TECHNICAL RISK ASSESSMENT

A Risk Assessment to meet with OPRC Contingency Planning requirements for ports and terminals has been completed by the Trust, following the format suggested by the MCA. The bunkering procedures for two companies providing bunker fuel by road tanker and one company providing bunker fuel by bunker barge have been obtained for the purpose of this risk assessment and are available for inspection if required.

The Bunker Cecklist is at the Annex

1.9.1 Scope of Assessment

This assessment covers marine and associated land-based operations carried out within the Trust's jurisdiction at the Docks. The jurisdictional limits have previously been identified (Section 1.3).

1.9.2 Methodology

This risk assessment is designed to identify potential oil sources (i.e. all oil-containing systems), the size of potential spills and to estimate the risk associated with the release of oil from potential spills into the marine environment.

All oil-containing systems, initiating events that could result in an accidental spillage and the potential maximum quantity (inventory) that could be released were identified and examined. The full range of control measures implemented by the Trust to minimise the risk of an oil spill have been considered for each pier and slipway.

1.9.3 Historical Data

As each incident/spill occur, a lesson's learnt exercise will follow and those lessons applied. Lessons will be recorded within this document

1.9.4 Risk Rating

The environmental risk assessment has been undertaken using a qualitative approach. The following categories ranging from *'Low' to 'High'* have been used to indicate the risk of pollution to the environment.

RISK RATING and DEFINITION

RISK RATING	DEFINITION
Low Risk	No legal implications. No noticeable environmental impact. No additional controls required.
Moderate Risk	Breach of legislation with potential for fines. Minor to moderate environmental damage to the local area, minor risk to humans and wildlife or contribution to cumulative environmental pollution problems. Damage likely to have a moderate cost implication.
High Risk	Breach of legislation with potential for large fines or prosecution. Environmental damage of high significance. Damage likely to have a high cost implication. Risk to health of people and wildlife.

1.9.5 Establishing Risk Criteria

Risk analyses may be characterised as "hazard-based" or "risk-based".

A hazard- based analysis examines possible events regardless of their low (or high) likelihood. For example, a potential impact would not lose significance because the risk has been reduced due to an increase in the level of control, such as engineering standards.

A risk-based analysis, takes into account the likelihood of the event occurring or the measures that can be taken to mitigate against its potential impacts. This OSCP uses a qualitative risk-based assessment. Therefore, the likelihood of oil spills occurring is considered prior to and following implementation of harbour control measures.

1.9.6 Factors of Assessment

General description of facilities

The lock defines the size of the vessels to visit The System:

- Max Draught 8m
- Max Length 176m
- Max Beam 23m

Oils used

User	Oil
Tugs	Marine gas oil for propulsion and EXXMA 12 TP 30 (Esso) or similar for lubrication
Road tankers	Deliver standard marine diesel oil and domestic heating oil
Bunker barges	Deliver marine fuel and diesel oil

West Ferry Printers	Mineral and vegetable oil based inks
British Waterways vessels	Diesel oil and petrol
Leisure craft	Marine diesel and a small number use petrol
Docklands Scout project	Standard domestic heating oil and diesel oil for motor craft and petrol
Docklands Sailing and Watersports Centre	Diesel oil for motor craft and petrol
Canal and River Trust M & E plant	Mix of mineral oils and biodegradable oils

Potential Sources of Spills

- Diesel tank depositing 4 tonnes diesel fuel directly into dock or oil spilt into an excavated area / construction site being pumped out with ground water.
- Leak from bridge hydraulics - maximum 600 litres
- Road tanker spill during bunker operation - maximum 2 tonnes
- Operation of automatic bilge pumps, contaminated bilge water - 25 litres
- Deliberate discharge of contaminated bilge water - 25 litres
- Leakage from bunker tank(s) on sunken craft – maximum 2000 litres Vandalism, storage tank(s) opened – maximum 3000 litres
- Spill from refuelling of visiting ships via bunkering barge - maximum 250 tonnes
- (the use of bunkering barges for re-fuelling occurs more frequently than previously) (cause of 50 litres diesel oil spillage in 2018 when tank on visiting vessel was overfilled during refuelling)
- Collision between two tugs - estimated maximum 15 tonnes
- Spill from industrial premises bordering docks - size indeterminate
- Spill from crane hydraulics - maximum 250 litres
- Spill from bunded heating oil tank held by scouts on "Lord Amory" - 2500 litres
- Overturned barge with oil drums in forecastle - say 600 litres
- Spill from bunded diesel and waste oil tanks held by the Trust - 3000 litres
- Spill from ruptured fuel tanks after vessel collision with dock infrastructure - up to 25 tonnes
- Leakage from road vehicle ruptured fuel tank - 250 litres
- Spill while refuelling small craft - 100 litres (spill caused by leak from fuel tank on an unmanned residential vessel a short while after re-fuelling had taken place (2018))
- Leakage from disturbance of contaminated soil/underground structures during construction work – 1000 litres - new & based on actual incident (2017)
- Spill from commercial premises bordering docks – e.g. from over-filling of faulty roof-top heating oil tanks – 2000 litres – new & based on actual incident (2015)
- Oil discharge from surface water drain outfalls after illegal or accidental release of oil into the drainage system – 2000 litres – new & based on actual incident (2017)
- Leakage from sluice hydraulics – 100 litres - new & based on two actual incidents (2016 & 2017)

- Spill from equipment used in construction activity (disconnection of hydraulic hose from manifold on piling rig) – 50 litres - new & based on actual incident (2015)
- Leakage from ruptured oil-filled pipe on vessel – 100 litres - new & based on actual incident (2017)

The worst-case scenario identified is an oil spill of 250 tonnes, associated with refuelling from a bunker barge.

Specific Recovery Issues

Buildings and quays elevated on piles (false quays) would allow oil to move underneath inaccessible areas, thus extending clean-up time.

Accessibility between boats moored in marinas, such as Poplar Dock or Blackwall Basin, would extend clean-up time.

In order to avoid fish at Billingsgate Market becoming contaminated with an oily odour, oil is to be kept away from the Market in the Northern Dock.

Containment and Clean-Up

Response Strategies

The entrance to the dock system is via lock gates at the entrance to South Dock. Closing the lock gates as a temporary measure would affect an immediate containment of spills within the dock system, which would prevent oil entering the River Thames.

This response has been used when spills have occurred close to the lock. However, intermediate localised containment, in order to facilitate a clean-up, is also required.

In the enclosed docks, the wind is most likely to blow the oil into a corner or to one end of a dock. Booms should be deployed to prevent oil from being blown underneath inaccessible piled structures, with further booms then being used to retain the oil in the area to which it has been blown. There are several narrow cuttings and passages where booms can be effectively deployed.

Once contained, the oil can be removed from the water surface using skimmers or oil absorbent materials, depending on the quantity and type of oil spilt. With vehicular access available to almost all locations, suction road tankers should be considered.

Because of the area and the adjacent properties, including the Canary Wharf Estate, the likelihood is that any significant amount of oil spilt into the waterspace would result in the call-out of the Tier 2 contractor.

Priorities for Protection

- The following should be given priority when considering where to deploy booms:
- Keep oil away from Billingsgate Fish Market
- Keep oil away from lock gates and deploy booms in such a manner as to enable continued movement of vessels in and out of the docks without loss of oil
- Deploy booms to protect tern rafts and floating reed beds (refer to Appendix 5 for the location of these)
- Deploy booms to prevent oil disappearing underneath overhanging buildings and walkways
- Deploy booms to prevent oil from entering into marinas or around clusters of visiting vessels

Access

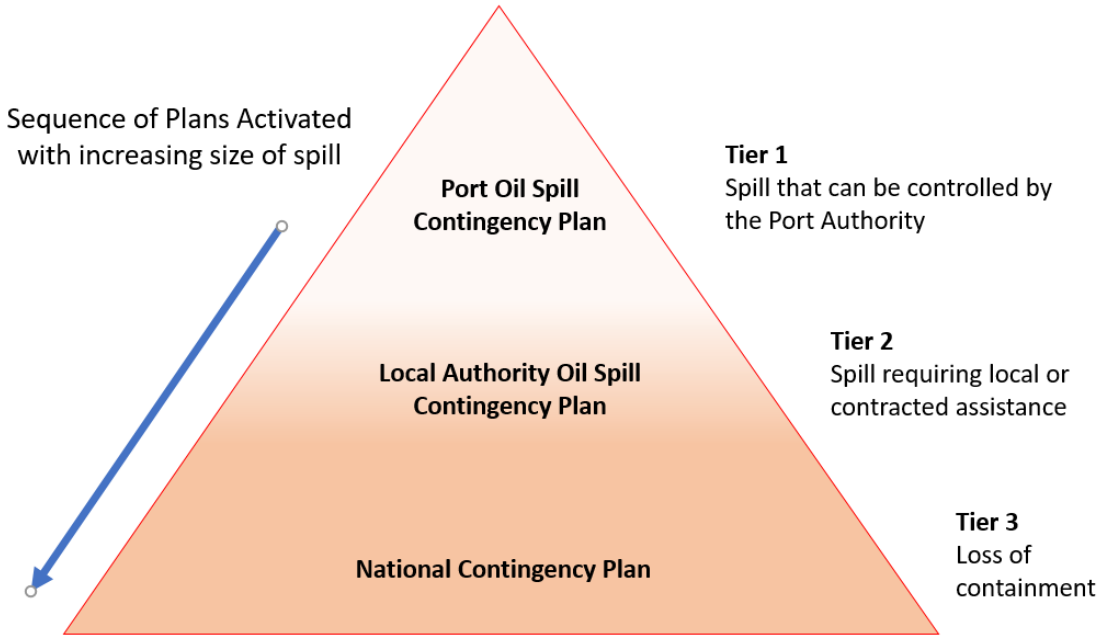
Access for equipment deployment is available throughout the docks complex. Probably the best location for boom deployment would be by the lock gates, at the entrance to South Dock. From there, the boom could be towed into the required position.

Tiered Response

In view of the need to rapidly clean up spills in order to minimise economic disruption and achieve relatively easy clean-up conditions, it is suggested that the following spill criteria would apply:

- Tier 1 spills up to 25 litres
- Tier 2 spills up to 200 tonnes
- Tier 3 spills above 200 tonnes

CATEGORIES OF INCIDENT



Light oils such as gas oil, petrol, kerosene etc. are usually best left to disperse naturally, as they are difficult to recover and application of dispersants is not advised. Most crude oils and light fuel oils will respond to dispersants (at sea only).

Heavy fuel oils, medium fuels and lube oil will not respond to natural dispersion and therefore the best means of dealing with these is by mechanical recovery. Wherever possible, this type of oil should be corralled and recovered.

Summary

The probability of a major oil spill is considered small, but the probability of comparatively small spillages is quite high. The review of oil spills that have occurred since the last version of this Plan was issued (contained in Appendix 4) demonstrates that there have been approximately 3 such spillages each year. These have been associated with construction-related activities around the docks, visiting and residential vessels, CRT lock infrastructure and a polluted surface water discharge.

Spill Equipment

Minimum equipment to be held on site for Tier 1 spills

Oil absorbent materials (absorbent booms, cushions, pads and rolls)

Small oil retention boom not less than 100 metres

Minimum equipment to be held either on site or by spill contractor for Tier 2 spills:

- 200 metres port boom
- 100 metres intermediate containment boom
- Appropriate boom accessories (anchors, ropes, mooring buoys etc.)
- Oil skimmers
- Emergency recovered product holding tanks
- Oil absorbent materials
- Immediate access to waste oil tankers to remove recovered product from site

Waste Management

The Trust has a Port Waste Management Plan in operation in accordance with The Merchant Shipping (Port Waste Reception Facilities Regulations) 2003 (as amended).

1.10 ENVIRONMENTAL SENSITIVITIES AND PRIORITIES FOR PROTECTION

General Strategy

The strategies within the enabling strategies are considered below, although as an enclosed docks system much is not applicable.

The regulations use the term “ashore”: in this context ashore is means dock walls and other dock infrastructure.

The Plan does not consider estuarine conditions or sand or mudflats.

Specific Strategy

- Tier 1 spills are dealt with by Trust marine operatives who have undertaken MCA Type 1p training.
- Tier 1 oil spill stocks (as set out in Section 11 of this document) are stored immediately adjacent to South Dock for swift deployment.
- The Harbour Master and Deputy Harbour Master are to trained and qualified to the MCA Oil Response Manager level. Either will be the On-Scene Commander.

Tier 1 spills will be mopped up immediately using sorbent booms or contained until the Tier 2 Contractor arrives. In the event of a spill into the water column (Tier 2 and above), the Accredited Tier 2 Contractor would be contacted immediately, and the Standing Environment Group convened. Commercial and environmental sensitivities weill be balanced..

Because of the surrounding properties, estates and facilities calling in the the Tier 2 Contractor will be considered to assist with a rapid clean-up even if a spill was categorised as Tier 1.

In such a case, the Trust’s priority would be to achieve containment. If a spill is land-based but there is a risk of oil entering the water column, the Tier 2 Contractor might also be called in to assist.

There are large fish populations in the docks and it is the view of the Environment Agency that contingency arrangements should focus on the physical removal of any spilt oil. Physical

removal will be assisted by the use of absorbent pads and booms and/or the use of vacuum tankers in the event of a large spillage.

In the likely event that any spilt oil would collect downwind in a corner of the dock, a clean-up operation could be mounted from the quayside or floating craft.

Dispersant use is not considered acceptable practice by the Trust.

In any spill, until the clean up operation, or isolation of the spill is complete, the Lock will remain closed to protect the Thames.

Environmental Sensitivities

The Docks provide a home for tern rafts coming under the aegis of the Greater London Authority (GLA) Ecology Unit. The numbers of terns are in the low tens of pairs and, as these are migrant birds, they are only within the area between May – September. They are of interest, however, as they are normally coastal birds, and it is potentially unusual to find them inland. This makes them a priority for protection.

The GLA Ecology Unit has several tern rafts in Blackwall Basin. There is a raft in Millwall Inner Dock, but this is usually occupied by coots. There is also a raft in the Clippers Quay inlet, the old Millwall Graving Dock - this is not suitable for terns but has been used by coots and mute swans. There used to be two rafts near Billingsgate Fish Market, these have been relocated to other locations in the North Dock due to development work and construction traffic. These have been used by coots but it is not believed that terns nest on them. There is one raft in the Middle Branch Dock, in a section of the waterspace which belongs to the Canary Wharf Group and adjacent to the Littlejohn Frazer offices. This is not considered a suitable place for terns.

There are several tern rafts in East India Dock Basin, which is not part of the Trust's jurisdiction. The GLA publishes "Nature Conservation in Tower Hamlets" as a guide to the total ecology in the Borough.

Maps showing the location of the tern rafts and floating reed beds are included in Appendix 5.

The Standing Environment Group will be tasked to provide appropriate environmental advice in the event of a spill.

Fish marketed at Billingsgate Fish Market are all brought in by road and no fish are landed directly into the market by water. Commercial fisheries on the Thames tend to be seaward of the Queen Elizabeth Bridge, which carries the eastern side of the M25 over the river, although some eel fishing is carried out in the river close to the lock entrance.

There are no nationally or internationally designated areas in close proximity to the area, the closest being Swanscome, downstream.

Economic and Tourism Sensitivities

A prolonged closure would impact:

- Floating plant which enters the Docks on an ad hoc basis for specific construction projects.
- Housing sales
- For Water-based businesses, the main casualties could be the Docklands Sailing and Water sports Centre, the Docklands Scout Project, the Lotus Chinese Restaurant, and several boat-based businesses located at West India Quay.
- Adverse media coverage of the spill and recovery would be detrimental to the Trust's corporate image, hence the early call-out strategy detailed earlier.
- Similarly, any decline in numbers visiting nearby pubs, bars and restaurants would have an effect on the local commerce. Visiting vessels could also be deterred from mooring, causing loss of revenue to the Trust.

- The Canary Wharf Estate shopping malls and numerous similar businesses adjacent to the Docks have become tourist attractions in their own right, with substantial numbers of visitors to these locations.
- The Docklands Light Railway crosses the Docks from north to south, on elevated viaducts. It is possible that a serious incident could affect the local operation of this service.
- The London Docklands Angling Consortium comprises five angling societies and has a licence to fish most areas of the docks.
- The activities of the Docklands Sailing and Watersports Centre include sailing, dragon boat racing, canoeing, together with the use of power boats for safety and other duties. These activities are mostly confined to the Millwall Outer Dock.
- The Docklands Scout Project runs water based activities from Easter until July, and again from September until the end of the October half term holidays. If an incident of oil pollution caused the dock to be closed off, the project would try to move its craft to another location.

At the time of the original plan, the London Borough of Tower Hamlets considered that there were approximately 30,000 people who worked on the lands adjacent to the Docks, with bars and restaurants with sitting-out areas. The working population has since increased substantially as further developments have been completed. The latest estimate is approximately 100,000 and this is expected to increase even further as other developments get underway and are completed. There has also been an increase in the number of hotels close to the Docks and a consequential increase in the numbers of hotel guests.

Although Billingsgate Fish Market has no river traffic, there are two aspects of its operations which impact on this plan. In terms of risk assessment (dealt with separately), in the event of an incident of oil pollution, there is a likelihood of contamination of the product (fish) by odour, which would give rise to a claim for damages from the various traders within the Billingsgate Fish Market complex. This raises the possibility of an economic impact on local commerce.

Billingsgate Fish Market is an access point for the deployment of equipment, and is represented as such in the response strategy and site specific information sections of this plan, but in economic terms it is essential that no contaminated material is removed through Billingsgate Fish Market itself for the same reason.

1.11 CATEGORIES OF INCIDENT AND OVERALL STRATEGY

The Trust has in place a three-tiered incident response system for oil spillage. The responsibility of escalating an incident from Tier 1 to Tier 2 lies with the Harbour Master or other Senior Manager in their absence.

Levels of Call-out

Tier 1 Spills

- For small operational spills on the jetty or the deck of a vessel (Tier 1 limits defined in the risk assessment), the response is made by the Trust, who holds Tier 1 stocks (as listed in Section 11) immediately adjacent to South Dock.
- The Harbour Master will monitor actions taken and ensure that waste is correctly stored and managed. Since all oil spills, regardless of size, are to be reported to the appropriate authorities, the Harbour Master will alert the MCA.

Tier 2 and Tier 3 Spills

- For all spills of a higher level (as defined in the risk assessment) and any spill which enters the water column, the Harbour Master will alert the Incident Response

Organisation according to this plan through the Accredited Tier 2 Contractor, MCA, local authorities, and the EA and Natural England.

Prevention or Reduction of Oil Flow

Part of the responsibility of the accredited Tier 2 Contractor will be to implement an appropriate booming strategy.

Monitor Oil Slick

Meteorological and tidal information will be used by the Trust to monitor and predict the movement of the oil slick.

Recovery of Oil

Recovery will be made following the legislative procedures outlined in this plan and in conjunction with the accredited Tier 2 Contractor, Environment Agency and a licensed waste contractor.

Protection of Key Resources

Key resources are both commercial and environmental. The protection of commercial interests will be monitored. Environmental interests are discussed elsewhere in this plan in terms of priorities.

Shoreline Clean-up

The Trust is only be responsible for shoreline clean-up in an area it owns; otherwise this is the responsibility of EA and the appropriate local authorities.

The Trust would participate in the setting up of a Shoreline Response Centre. In the context of the enclosed Docks system, the shoreline is considered to be the dock walls and infrastructure.

Within the Docks, the situation could be complicated by the varied ownership of dock walls and some small water areas but the Trust will remain the lead organisation on most occasions.

Any seepage out into the River Thames would involve the PLA.

Use of Dispersants

Dispersant use is not the general policy of the Trust.

Dispersants would ONLY be used to clean equipment (except skimmers) in an enclosed environment NOT near the water column.

SECTION 2: COMMAND AND CONTROL

2.1 Introduction

This Plan has been compiled to cover the response to any spillage caused by operations within the jurisdiction of the Trust at West India and Millwall Docks.

This includes spills from shoreside operations and vessels (whether they be alongside, in transit or on passage). The Plan indicates the Tier 1 response available at the port, relevant to the perceived risk through normal operations, as well as a mechanism for calling upon a Tier 2/3 response in the event of an abnormal incident or major accident affecting the Docks.

Definitions of the tiered levels used in this Port are shown in Section 1.

2.2 Responsibilities and Incident Control Arrangements

The Operations Response Team will be led by the Harbour Master. It will also involve the personnel detailed below. The Pollution Response Centre will be established in Marine Control for Tier 1 and Tier 2 spills.

The Response Team Members are:

- Harbour Master - Incident / On-Scene Controller
- Trust Operatives – On scene containment, lock operation, communications
- Accredited Tier 2 - Contractor Clean-up Supervisor
- Accredited Tier 2 - Contractor Clean-up Operations
- Accredited Tier 2 - Contractor Logistics Support

2.3 Internal Alerting and Call-out Procedures

Out of working hours reports may come from the MCA, Police or Dock users.

Any information received concerning an oil spill is to be passed immediately to the Harbour Master. The Harbour Master will determine the level of clean-up operation necessary and the requirement as to whether to activate the Internal Incident Management Team (Section 2.4). All calls and decisions made must be recorded and a POLREP raised (Section 3.3).

2.4 Internal Incident Management Team (IMT) – Direct Operations

The IMT will be led by a Team Leader and will involve the Trust personnel dealing with Tier 1 & 2 Oil Spill Management. The Marine Response Centre (MRC) will be established in the Marine Control.

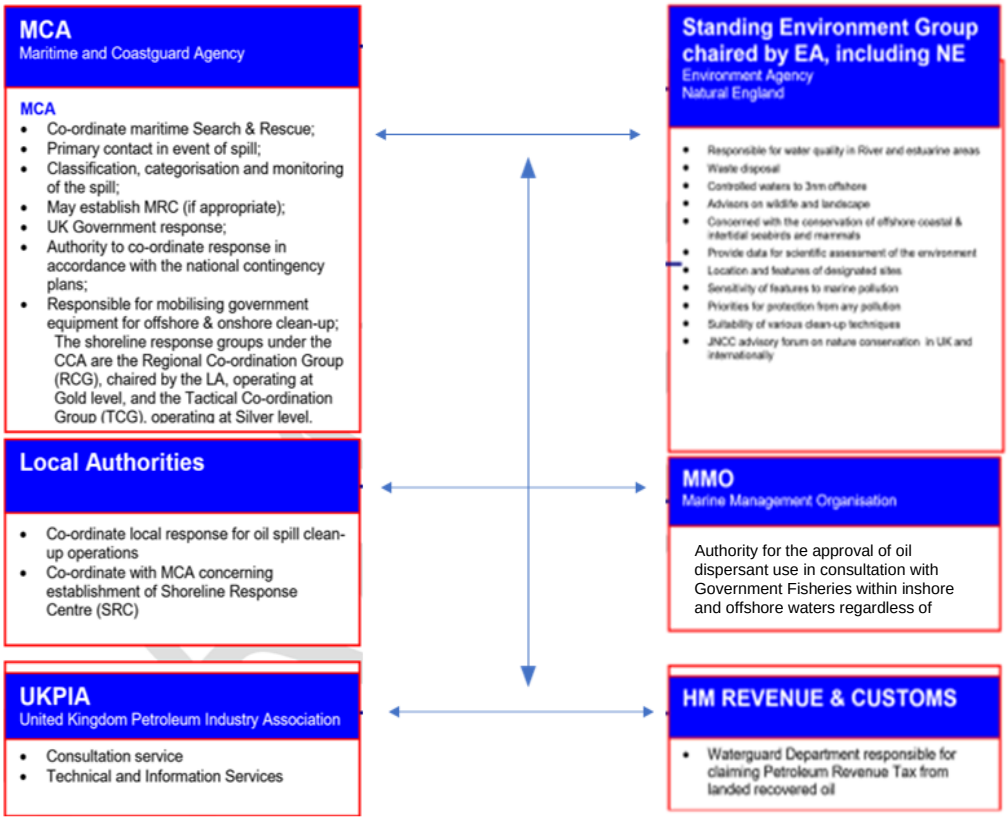
2.5 Oil Spill Management Team (OMT) – Effects Clean Up

For Tier 2 & 3 incidents, an OMT will be established at Marine Control and Conference Room as necessary.

In the event of a Tier 3 incident and the implementation of the National Contingency Plan, the OMT will assist the MCA and appropriate members of the OMT will re-deploy to the Shoreline Response Centre.

The Trust's Incident Room will remain active unless superseded by the MCA Marine Response Centre. The Harbour Master will require the transfer of responsibility for managing the incident response to be formally documented prior to relinquishing overall control of at-sea counter pollution measures to the MCA.

2.6 External Organisations Represented on OMT



Natural England is included as a member of the Standing Environment Group and will provide advice on:

- Location and features of designated sites
- Sensitivity of those features to marine pollution
- Priorities for protection from any pollutants
- Suitability of various clean up techniques

2.7 Categories of Incident

The Trust has in place a three-tiered incident response system for oil spillage (Section 1.10.7). The responsibility of escalating an incident from Tier 1 to Tier 2 lies with the Harbour Master.

In the event of a protracted, long-running incident, emergency duty rosters will be utilised with back-up resources from the Tier 2 Responder. Accommodation and catering will be sourced via local resources (local council) and shift rotation will be employed to allow adequate breaks and reduce fatigue. The Trust has the ability to call on other staff from the wider London region and harbour operatives nationally.

Levels of Call-out

Tier 1 Incident

For minor spills, where the response is restricted to within the harbour area, the Harbour Master will take the appropriate action and arrange for the safe storage and legal transportation and management of waste arisings.

Since all oil spills, regardless of size, have to be subject to statutory notifications, the Harbour Master will always alert the MCA.

Tier 2/3 Incident

Regardless of the location of a Tier 2 or 3 incident, the OMT (Section 2.5) is to convene. The representatives from the various external organisations on the OMT (as shown in Section 2.6) will differ dependent upon the tier.

2.8 Tactical Response Group. (TRC)

The implementation of the National Contingency Plan may involve the MCA establishing a TRG, under the chairmanship of a senior local authority officer, to coordinate shoreline clean-up activities. The Trust will offer any available office space or facilities for use as an TRG.

2.9 Setting up the National Response Units

During the management of a counter pollution response to an incident, the hierarchy of aims is

- To prevent pollution occurring;
- To minimise the extent of any pollution that occurs; and
- To mitigate the effects of that pollution.

Separate, but linked, response units direct operations. There may be units to handle salvage (the Salvage Control Unit (SCU)), action at sea (the MRC) and action on the shore (the TRG). An environment group provides environmental advice to all of these units. Not all incidents require all these response units. However, the arrangements for managing the incident must allow for the possibility of salvage operations, action at sea and action on shore taking place simultaneously.

The accommodation for each unit should have:

- Sufficient telephone lines to enable full liaison with outside bodies (essential);
- Photocopier, fax and e-mail facilities (essential), although noisy equipment should be located in a separate room;
- Fixed VHF equipment (desirable);
- Television and video facilities - extremely useful for playing back videotapes from aircraft and helicopters, as well as watching local and national coverage of the incident; and
- Wall space to display several charts and status boards (essential).

Those holding responsibility for keeping the status boards continuously updated are to be aware that their objective is to present a summary of the current situation and response actions being taken.

2.10 Salvage Control Unit (SCU)

The Secretary of State's Representative (SOSREP) will decide whether the Salvor has the capability to carry out the necessary salvage actions, in terms of personnel and material. The SOSREP decides whether it is necessary to set up an SCU. If the size of the incident merits the establishment of an SCU, SOSREP* travels to the scene of the incident at an appropriate time.

The report identified that, during salvage activities, ultimate control over all operations should become the responsibility of a single designated SOSREP for purposes of maritime salvage and intervention and that the SOSREP could not abdicate their responsibility. Whether or not he/she exercised any intervention powers at all SOSREP would be in no doubt whatsoever that he/she

was in charge and would be held responsible for the outcome of all plans and decisions. Put simply - to ignore a situation is not an option.

The powers of intervention with which SOSREP is invested could indeed not be more far reaching. They are, however, presently wider for response to pollution than for safety. They provide that SOSREP can direct a person to take, or refrain from taking "any action of any kind whatsoever". Indeed, if SOSREP is not convinced that the person directed can, or will, take the action then he/she may cause the action to be taken themselves - even if this includes the total destruction of a vessel.

The legislation also creates criminal offences for non-compliance with a Direction. It should be noted that Directions must be given to specified persons who are those being in charge of a vessel or a port or harbour authority.

The members of the SCU are as follows:

- SOSREP;
- The Salvage Manager from the salvage company appointed by the ship owner;
- The Statutory Harbour Master or their appointed deputy, if the incident involves a harbour or its services;
- A single representative nominated by agreement between the ship owner and the insurers (for both the physical property and their liabilities);
- A Counter Pollution & Salvage Officer (CPSO)
- An Environmental Liaison Officer, nominated by the Chair of the Environment Group; and
- If SOSREP decides to appoint one, SOSREP's Personal Salvage Adviser.

2.11 Standing Environment Group (SEG)

There are 14 Standing Environment Groups (SEGs) around England and Wales. SEGs are responsible for a particular area of coastline and provide information and advice to the Secretary of State's Representative (SOSREP) on:

- Conservation
- Fisheries
- Human health
- Best environmental practice to dispose of wrecked ships and spoilt cargo
- How to deal with oiled wildlife and environmental monitoring

SEG members may include representatives from:

- MMO Coastal Office
- Environment Agency
- Natural England or Joint Nature Conservation Council
- Local Councils
- The SEG through Public Health England representation would particularly be asked to provide advice on the welfare of the 100,000 people who work in and around Canary
- Wharf. The SEG covering the Dock's location is the South East Environmental Group.

In the event of a polluting incident, a POLREP CG77 form would be sent to the PLA, London Coastguard and the MCA (amongst other organisations).

The PLA and the London Coastguard would then review the form and decide whether the SEG should be convened for this incident. The Trust do not need to contact the SEG directly to get it convened.

2.12 Locations

The locations of the various response cells will be divided between the facilities available at the Trust and the Local Authorities.

2.13 Interface with other Contingency/Emergency Plans

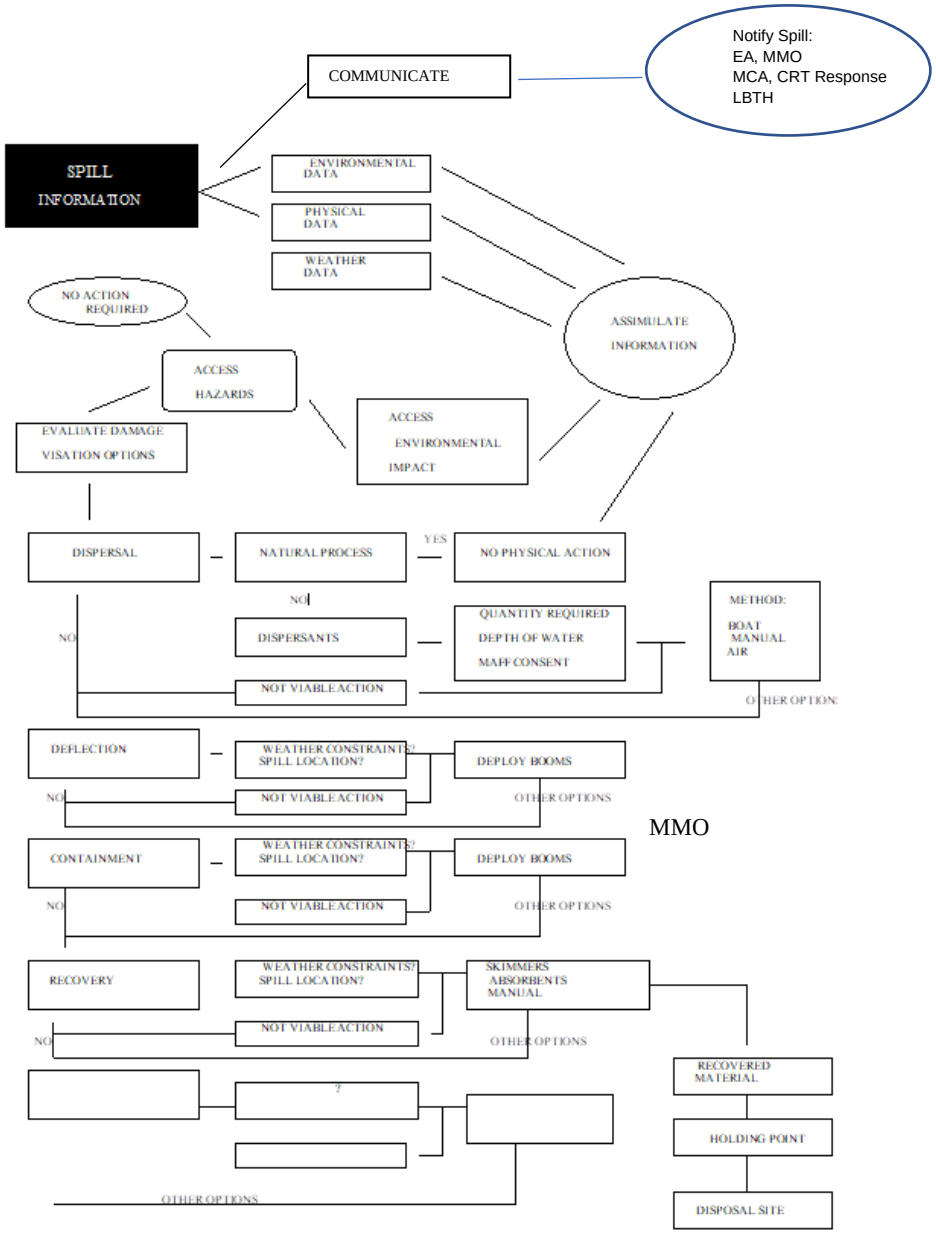
The Trust will send a copy of its own plan to the following statutory consultees: London Borough of Tower Hamlets, Natural England, MMO, EA and PLA.

In addition, it will seek emergency plans from the London Borough of Tower Hamlets and the Greater London Authority.

The Trust has been consulted by the PLA on their oil pollution plan and have electronic access to it.

2.14 Communications Flow Chart

Spill Information Flow Chart



SECTION 3: INCIDENT REPORTING PROCEDURES

3.1 Use of Section

This section sets out the incident reporting procedures, which should be followed in the event that an oil spill occurs within the Trust's jurisdiction at the Docks.

The extent of notification of external organisations and authorities will be determined by the initial classification of the incident. Responsibility for external notification and the completion of POLREP CG77 rests with the Statutory Harbour Master or their appointed deputy.

The statutory requirement, placed on the Port under Statutory Instrument 1998 No.1056, to report all actual or probable discharges of oil to the sea to MCA - HM Coastguard is noted:

Extract from Statutory Instrument 1998 No. 1056

Reporting of incidents: harbour authorities and oil handling facilities

6. - (1) A statutory Harbour Master or their appointed deputy, or other individual having charge of a harbour, and any individual having charge of an oil handling facility (except those which are pipelines), who observes or is made aware of any event involving a discharge of or probable discharge of oil, or the presence of oil in the sea shall without delay report the event, or the presence of oil, as the case may be, to MCA - HM Coastguard.

(2) A report under this regulation shall so far as appropriate as to form and content comply with the standard reporting requirements.

3.2 Notification Procedures

For the telephone/fax numbers of the following organisations, refer to the external Contacts Directory (in Section 10).

Notification Table

Organisation	Tier
Maritime and Coastguard Agency	1/2/3
Environment Agency	1/2/3
Marine Management Organisation	1/2/3
Natural England	1/2/3
London Borough of Tower Hamlets	2/3
SOSREP (via MCA)	2/3
RSPB	2/3
Standing Environment Group	1/2/3
Adler and Allan	2/3
Trust Senior Management	3
Trust Press	
Trust Heritage & Environment manager	
Port of London	2/3
MCA London Coastguard	1/2/3

3.3 POLREP CG77 – Essential Notification Usage & Form

INSTRUCTIONS FOR COMPLETING FORM CG77 (POLREP)

(template provided at end of this section)

PART 1 - INFORMATION WHICH SHOULD BE PROVIDED IN AN INITIAL REPORT

CG77 POLREP

A. CLASSIFICATION of report - (i) Doubtful, (ii) Probable, (iii) Confirmed.

B. DATE and TIME pollution observed/reported and identity of observer/reporter

C. POSITION (Always by LATITUDE and LONGITUDE) and EXTENT of pollution. If possible, also state range and bearing from a prominent landmark or Decca position and estimated amount of pollution (e.g., size of polluted area, number of tonnes of oil spilled or number of containers, drums etc., lost). When appropriate, give position of observer relative to the pollution.

D. TIDE, WIND, speed and direction.

E. WEATHER CONDITIONS and SEA state.

F. CHARACTERISTICS of pollution. Give type of pollution e.g., oil (crude or otherwise), packaged or bulk chemicals, or garbage. For chemicals give proper name or United Nations Number if known. For all, give also appearance, e.g.. liquid, floating, solid, liquid oil, semi-liquid sludge, tarry lumps, weathered oil, discoloration of sea, visible vapours etc., should be given.

G. SOURCE and CAUSE of pollution e.g., from vessel or other undertaking. If from vessel, say whether as a result of apparently deliberate discharge or a casualty. If the latter, give a brief description. Where possible give name, type, size, nationality and Port of Registry of polluting vessel. If vessel is proceeding on its way, give course, speed and destination.

H. Details of VESSELS IN THE AREA. To be given if polluter cannot be identified and the spill is considered to be of recent origin.

I. NOT USED.

J. Whether PHOTOGRAPHS have been taken and/or SAMPLES for analysis.

K. REMEDIAL ACTION taken or intended to deal with the spillage.

L. FORECAST of likely pollution (e.g.. arrival on beach), with estimated timing.

M. NAMES of those informed other than the addressee.

N. Any OTHER relevant information (e.g., names of other witnesses, references to other instances of pollution pointing to source).

PART II - SUPPLEMENTARY INFORMATION TO BE PROVIDED LATER

(This section may be disregarded when POLREPs are for UK internal distribution only)

O. RESULT of SAMPLE analysis.

P. RESULTS of PHOTOGRAPHIC analysis.

Q. RESULTS of SUPPLEMENTARY ENQUIRIES (e.g., inspections by Surveyors, statement of ship's personnel etc., if applicable).

R. RESULT OF MATHEMATICAL MODELS.

POLREPs are to sent IMMEDIATELY to:

- Maritime and Coastguard Agency (MCA)
- Environment Agency (EA)
- Marine Management Organisation (MMO)
- London Coastguard (HMCG)
- Port of London Authority (PLA)
- Natural England (NE)

London Borough of Tower Hamlets

NOTES

1. POLREPs should be used for oil, chemical or dangerous substance spillages and for illegal discharges of garbage.
2. All messages should be pre-fixed by the codeword POLREP followed by a serial number issued by the originator. Subsequent updating or amplifying reports should repeat this information and add a SITREP number, e.g., "POLREP 21/SITREP 1" would be followed by "POLREP 21/SITREP 2". The first report is assumed to be SITREP 1 with subsequent reports being numbered sequentially.
3. Groundings, collisions or breakdowns of oil tankers or other vessels carrying pollutants, including bunkers, should be treated as potentially serious incidents with a classification of "PROBABLE" until proved otherwise. The use of link calls or inmarsat calls to Masters of ships is often the best method of obtaining information.
4. Local C/P alerting plans should establish the following responsibilities:

   a. Coastguard to inform the County Oil Pollution Officer (COPO) in England and Wales, the Local Oil Pollution Officer in Scotland, Department of Environment in Northern Ireland, or the appropriate authority in the Channel Islands or Isle of Man where there is an immediate or potential risk of oil coming ashore in their area.

   b. In England, Scotland and Wales, HM Coastguard to inform COPOs/LOPOs in the counties immediately adjacent to counties at risk, that they may be at risk.
5. Although Chief Surveyors of Marine Regions are not directly involved with C/P operations, it is necessary to include them as addressees to give them notice of possible involvement with salvage, surveying a casualty or possible prosecutions under current regulations.
6. Care should be taken to avoid undue escalation of UNCONFIRMED pollution incidents with consequent misleading publicity.

CG77 POLREP Form

PART 1 - INFORMATION WHICH SHOULD BE PROVIDED IN AN INITIAL REPORT

To be sent to:

- Maritime and Coastguard Agency (MCA)
- Environment Agency (EA)
- Marine Management Organisation (MMO)
- London Coastguard (HMCG)
- Port of London Authority (PLA)
- Natural England (NE)

- London Borough of Tower Hamlets

O. Classification of pollution report - (i) Doubtful, (ii) Probable, (iii) Confirmed

(delete as necessary)

P. Date: _____ **Time**:_____ pollution observed/reported

Identity of observer/reporter: _____

Q. Position of pollution: _____
_____

(always by latitude and longitude, if possible state range and bearing from some prominent landmark)

Extent of pollution: _____ litres/barrels/tonnes **Size of polluted area**: _____ When appropriate, give position of observer relative to the pollution.

R. Wind speed: _____ knots; direction from: _____

Tidal status at time pollution observed: _____ after/before HW/LW

S. Weather conditions and sea state: _____

T. Characteristics of pollution

Type: _____ (e.g., oil, crude, diesel, packaged or bulk chemicals – UN number if known, garbage).

Appearance:

_____

(e.g. liquid, floating, solid, liquid oil, semi-liquid sludge, tarry lumps, weathered oil, discoloration of waterbody, visible vapours etc., should be given).

U. Sources of pollution: _____

(e.g. from vessel or other undertaking)

Cause of pollution: _____
_____

_____

_____

(If from vessel, say whether as a result of apparently deliberate discharge or a casualty. If the latter, give a brief description. Where possible give name, type, size, nationality and Port of Registry of polluting vessel. If vessel is proceeding on its way, give course, speed and destination.)

V. Details of other vessels in the area: _____
_____

(To be given if polluter cannot be identified and the spill is considered to be of recent origin.)

W. Photographs taken: Yes/No

Sample taken for analysis: Yes/No

X. Remedial action taken or intended to deal with the spillage:

_____

_____

Y. Forecast of likely effect of pollution: _____

_____

Z. Names of those informed other than addressees: _____

_____

AA. Any other relevant information: _____

_____

_____

(e.g. names of other witnesses, references to other instances of pollution pointing to source).

3.4 Oil Spill Progress Report

Ongoing Incident Report			
Incident Name:			
Updated by:			
Date:		Time (local):	
Summary of Incident Response Operations:			
Summary of Incident Response Resource Utilisation:			
Number of Recovery Devices:		Length of Booms in Use:	m
Sorbent Used:	kg	Number of Storage Devices:	
Number of Personnel:		Number of Vessels:	
		Number of Vehicles:	
Specialist Equipment:			
Oil Spill Balance Sheet:			
Total amount of oil spilled:			litres/tonnes
Total amount of oil recovered:			litres/tonnes
Outstanding amount of spilled oil:			litres/tonnes
Mass Balance:			
Estimated Natural Weathering:			litres/tonnes
Mechanically agitated:			litres/tonnes
Chemically dispersed			litres/tonnes
Skimmer recovered			litres/tonnes
Sorbent recovered:			litres/tonnes
Manually recovered:			litres/tonnes
Other……..			litres/tonnes

3.5 Tier 2 Contractor Activation Procedure & Call-out Information Sheet

In order to access Adler & Allan's (Tier 2 Contractor) services in the event of an oil spill incident call: **0800 592827**.

These telephones will be manned on a 24-hour basis. The caller will be asked to provide:

- Name of caller
- Name of company i.e. The Canal & River Trust
- Location of caller
- Telephone number including prefixes
- Brief details of the incident

The Duty Manager at Adler & Allan will be alerted to this call and they will then call the relevant member of staff at the Trust back within 10 minutes of receiving the initial call.. Once this contact has been made, further details will be collected by Adler & Allan to enable a response strategy to be determined.

AN AUTHORISION FOR ADLER & ALLAN'S RESPONSE WILL BE REQUIRED BY EMAIL FROM ONE OF THE NOMINATED REPRESENTATIVES AT THE CANAL & RIVER

TRUST. This authorisation should be e-mailed to:

Adler & Allan's Duty Manager at dutymanagers@adlerandallan.co.uk

Completion of the **Tier 2 Contractor Call-out Information Sheet** included in this section is not always essential, but it is a useful summary of the questions you may be asked by the Duty Manager at Adler & Allan.

On arrival, the Adler & Allan Team should be met by someone from the Trust and directed to the Command Centre or spill site.

Tier Two Contractor Call-out Information Sheet

Required by the Duty Manager before Mobilisation

Tier Two Contractor: Adler and Allan

PHONE:	
FROM (Sender's name):	
POSITION:	
COMPANY:	
CONTACT (e.g., phone/fax):	

1. Designated Call-out Authority	
2. Location of spill	
3. Time of spill (GMT and local time)	
4. Source of spillage	
5. Quantity (if known)	
6. Oil type and characteristics	
7. Weather conditions and forecast	
8. Resources at risk	
9. Clean-up resources available on site or others ordered with estimated time of arrival	
10. Vessel availability for equipment deployment, storage of recovered oil	
11. Location of Command Centre	
12. Name of On Scene Commander and designated contact(s) and/or deputies	
13. General information	
14. Tier Two Contractor Mobilisation **Approved by:** (Signed and Dated)	

SECTION 4: RESPONSE ACTIONS

4.1 General

The following section contains Action Cards and Checklists for the Oil Spill Management Team (OMT).

The Action Cards use a checklist style, in order that they effectively guide the person fulfilling the role through the actions that he/she is expected to take and also their responsibilities.

Action cards are in 4 sections:

Alert

- List the notifications required, internally and externally

Initial Actions

- Details the immediate actions that will be required to be carried out to initate appropriate response

Further Actions

- Actions required once the response operation is underway

Final Actions

- Action required before the operation can stood down

4.2	OBSERVER OF THE INCIDENT	
Step	**Actions**	**Additional Information**
Alert	☐ Notify: • Statutory Waterways Manager or his appointed deputy .	VHF Radio Channel 14 or 16, Mobile, Telephone.
Initial Actions	☐ **IF SAFE** to do so, attempt to either stop or reduce leakage. ☐ Provide as much information as possible, such as: • location of the spill • oil type • estimated quantity. ☐ Source of spill.	**DO NOT**: • allow naked flames; • allow operation of non-intrinsically safe equipment; • allow oil to directly contact skin; • approach spill site downwind.
Further Actions	☐ Standby to guide response personnel to scene and assist if possible. ☐ Act on instructions of the Statutory Waterways Manager or his appointed deputy	
Final Actions	☐ When finished/unable to lend further assistance, submit log to the Statutory Waterways Manager or his appointed deputy	Include: • time of events; • what you saw; • what you did; • who arrived and when; • what they did. **Use Log Sheet C4 - 4.4.4 - page 39.**

4.3	On Scene Commander	
Responsibilities	• Confirm/amend initial classification. • Complete CG77 and submit to Coastguard. • Manage the Pollution response. • Authorise expenditure. • Mobilise Tier 2 Contractor. • Convene Oil Spill Management Team. • Approve Press Statements. • Amend Contingency Plan.	
Step	**Actions**	**Additional Information**
Alert	• HM Coastguard. • Tier 2 Contractor. • External Organisations as required. • Environment Group	Via CG77.
Initial Actions	• Verify/amend spill classification. • Liaise with Staff for updated SITREP. • Convene Oil Spill Management Team. • Authorise mobilisation of Tier 2 Contractor.	Refer to Section 1.
Further Actions	• Chair the Oil Spill Management Team meetings. • Constantly review the strategy being employed and advise of changes where necessary. • Approve all expenditure commitments. • Brief Press Representative as required.	Via Head of Finance. Via PR Department.
Final Actions	• Terminate the clean-up. • Collate personal logs. • Prepare the incident report. • Hold full debrief involving all members. • Amend contingency plan(s) as required.	**Log Sheet**

4.4 Oil Spill Incident Checklists

The following pages contain Checklists designed to ensure consistency for all response personnel throughout the incident response. The Checklists are as follows:

- **Oil Spill Assessment Checklist (C1)**

Checklist to ensure that the initial assessment of the oil spill is accurate and all aspects likely to affect the classification, quantity and likely fate of the spilled oil are investigated thoroughly (refer to Section 4.4.1).

- **Incident Briefing Checklist (C2)**

Checklist to ensure that all personnel involved in the management of the incident are given a thorough briefing of the incident and are then able to give a consistent and effective briefing to personnel falling under their management during the incident (refer to Section 4.4.2).

- **Personal Log Checklist (C3)**

Checklist to ensure that all personnel involved in the incident response record correct and relevant information throughout the operation and consistent logs are then able to be submitted to the Harbour Master upon completion for use in subsequent reports and actions (refer to Section 4.4.3).

- **Incident Log Sheet (C4)**

This Log Sheet should be copied and used by the Log keeper in order that an accurate log can be kept of the incident for use as required during and after the incident (refer to Section 4.4.4).

- **Oil Spill Sampling Checklist (C5)**

This Checklist should be used a guidance for taking samples of the spilled oil that may be used legally, at a later date (refer to Section 4.4.5). Following this Checklist ensures that sufficient sample is taken and that it is packaged and labelled correctly

4.4.1 Oil Spill Assessment Checklist

C1	Oil Spill Assessment Checklist
This Checklist is designed to assist those personnel who have the responsibility of initially assessing and subsequently assessing the oil spill incident. These personnel are likely to be: * Statutory Waterways Manager or his appointed deputy * Supervisors	
Step	**Guidance**
* **Assess Safety Hazards.**	
* Determine Oil Spill Source.	If source unknown, investigate with care. Instigate actions to stop spillage at source **IF SAFE TO DO SO!**
* Estimate quantity of Oil released if exact amount unknown.	
* Assess prevailing and if possible future weather conditions.	Determine: * wind speed and direction; * state of tide and current speed; * sea state.
* Predict oil fate; determine direction and speed of oil movement in addition to weathering characteristics.	

4.4.2 Incident Briefing Checklist

C2	Incident Briefing Checklist
This Checklist is designed to facilitate an effective response team briefing and should be used by supervisory personnel.	
Step	**Notes**
• **Specify Safety Hazards.**	
• **Extent of Problem** *Size of spillage, type of oil, source.*	
• **Slick trajectory** *Tide and Wind conditions.*	
• **Response actions** *Strategies to utilise.*	
• **Resource mobilisation** *Equipment and personnel.*	
• **Planning Cycle** *Meetings schedule.*	
• **Additional Information** *Communications, Waste Disposal, Weather Forecast.*	

4.4.3 Personal Log Checklist

C3	Personal Log Checklist
This Checklist is designed to facilitate and provide consistency in the response teams log keeping.	
Item	**Guidance**
• **Safety Hazards**	Note potentially unsafe response activities and measures taken to mitigate the hazard. Record all accidents/near miss incidents regardless of how/potentially how serious result.
• **Initial Notification**	Record time of notification of oil spill incident and the name of the person informing you.
• **Daily Activities**	Keep a daily record of all response activities undertaken, including time and location. Also include: • meetings attended; • instructions received/given; • site visits and movements; • contacts with outside agencies.
• **Personal Contacts**	Generate a list of relevant contacts made, including contact details.
• **Photographic/Video records**	Note time and location of any photographs/ video taken.
• **Oil Distribution**	Make sketches of oiled areas with notes.
• **Site Supervision**	Keep a record of all staff under supervision, including hours of work etc. List all equipment utilised.
• **Expenditure Incurred**	Record all expenditure and keep receipts.

4.4.4 Incident Log Sheet

C4	Incident Log Sheet		
Incident Name			
Date		**Page Number**	

Time	Comment/Action/Detail

4.4.5 Oil Spill Sampling Checklist

C5	Oil Spill Sampling Checklist
This Checklist is designed to give guidance on taking samples of spilled oil. By following this Checklist, it will be possible to ensure that sufficient oil has been collected, packaged correctly, labelled correctly and handled in such a way that it may be used as part of a legal claim/prosecution.	
Item	**Guidance**
• **Number of samples required**	By law, a single sample of the spilled oil should be collected. However, it would be desirable to take at least three samples.
• **Sample frequency**	Whenever an incident is ongoing, at least one sample of spilled oil should be taken per day, where the oil pollution is on the water. Where shoreline impact has occurred, then one sample per every 1km of impacted shoreline should be taken per day.
• **Sample size**	Generally, at least 500ml of liquid should be taken or in the case of polluted shoreline, at least 50 gramms.
• **Method of sampling**	Where the oil is free floating, it is imperative that the oil is skimmed from the waters surface, and that no excessive amount of water is recovered. Where oil has impacted on the shoreline then oil should be scraped from rocks etc and placed in the sample container.
• **Sealing of sample containers**	Samples should be placed in screw top bottles and the top sealed with a means of ensuring that it cannot be tampered with, such as an adhesive label placed over the top and bottle.
• **Labelling of Samples**	Sample bottle should be labelled in accordance with STOp Notice 4/2001 appended to this document)
• **Information**	The samples should be sent to the address given in the STOp Notice. In addition to this, the MCA should be informed of the fact.

The local authority or Port Authority can take oil samples as part of their responsibility under the OPRC, and they will need to initially bear the costs incurred (although this cost can be added to what the polluter will pay, if the polluter can be established). Additionally, oil samples may be taken at the request of the MCA.

4.5 Prosecutions

The decision to open an investigation is determined by a number of factors. The investigation establishes the facts which, in turn, determine the actions listed below:

- No further action
- Notice of concern
- Formal caution
- Prosecution
- These mirror the provisions of the National Contingency Plan 2014 (revised 2017).

SECTION 5: RESPONSE GUIDELINES

5.1 Response Strategies

The Trust has no standing agreements in place for the use of dispersants in the Docks. In consideration of the current local environmental conditions, the use of such dispersants is not regarded as an appropriate response method. The Trust therefore prefers to undertake any clean-up activities using non-dispersant methods.

The previous flowcharts indicate the different response strategies that may be implemented, depending on the type of oil spill. A brief explanation of these follows:

5.1.1 Dispersant Use

The use of dispersants can be an effective method of combating oil spill incidents. However, the use of dispersants is strictly controlled and conditions are imposed dictating the location of its use. The Government body responsible for this control is the MMO and their approval must be sought prior to any dispersant operations being undertaken.

It should always be remembered that, where there are fisheries or shellfish present, the use of dispersant may have an adverse effect on these, due to the fact that dispersants will remove the oil from the surface and place it into the water column.

When shellfish or pelagic and demersal varieties of fish are known to be present, it is more appropriate to initiate a different response strategy**.**

Marine Management Organisation (MMO)

The MMO has a role in the protection of the marine environment, particularly in respect of fisheries and in ensuring the safety of the aquatic food chain, including the safety of consumers of fish and shellfish.

Under the terms of the Marine and Coastal Access Act 2009 and the Marine Licensing (Exempted Authority) Order 2011, it is a legal requirement that oil treatment products may normally only be used in the UK if they have been formally approved for this purpose by the licensing authority. In addition, specific permission from the MMO must be obtained under this legislation before any oil treatment products are used regardless of water depth.

During the preparation of this Plan, the use of dispersants as a response strategy was considered. It was decided that this was not an acceptable response strategy.

If, in the future, the no dispersant policy is reversed, then it is essential that the MMO be consulted and their permission for its use be given before any dispersant application takes place.

This Plan would then need to be amended to include the appropriate dispersant application guidelines.

5.1.2 Recovery using Weir Skimmers

Weir skimmers function by creating a weir just below the oil/water interface. Oil flow is induced into the weir by gravity and pumped away. The main disadvantage of this system is the fact that, usually, a great deal of water is also recovered posing problems for temporary storage.

5.1.3 Recovery using Vacuum Skimmers

As the name suggests, vacuum skimmers recover oil from the water surface by vacuum. Like the weir skimmer, this type of recovery is prone to recovering large quantities of water. Another disadvantage of this skimmer is that it cannot be used on oil types having a low flashpoint. This is owing to the heat generated through friction, possibly igniting the oil.

5.1.4 Recovery using Absorbents

For relatively small oil spills, the oil can be recovered using absorbent material, either natural or synthetic. Absorbents come in a variety of designs, from pads to small lengths of boom. Absorbents pose a problem in that they can prove difficult to dispose of if used in large numbers, particularly if of the synthetic variety.

5.1.5 Monitor and Evaluate

This response strategy is used where the spilled oil is inaccessible, or where a recovery operation may cause more damage to the environment than merely leaving the oil alone and allowing nature to take its course. If this strategy is employed, it is essential that the oil spill is regularly monitored and that alternative strategies can be employed if the oil begins to move to another area, where this strategy may be unacceptable.

5.1.6 Defence and Deflection Booms

If particularly sensitive areas are under threat, it is sometimes possible to strategically position booms as an attempt to deflect the oil away from the area.

If this strategy is employed, care should be taken on deciding where to place the booms and their configuration. Only trained personnel should undertake this task; otherwise there is a severe risk that the boom will fail.

SECTION 6: COMMUNICATIONS PLAN

6.1 Notification Matrix

	Oil Spill Tier			For contact numbers see section 10 Contact Directory	
Organisation	**1**	**2**	**3**	**Method**	**Remarks**
Statutory Waterways Manager or his appointed deputy/ Duty Officer	☎	☎	☎	Phone/email	Contact immediately. Statutory Waterways Manager or his appointed deputy will require information on the situation and will enact the oil spill contingency plan
Canal and River Trust West India and Millwall Docks	✓	☎	☎	Phone/email	Contact for information only
London Coast Guard 02083 127 380	☎	☎	☎	Phone/email	Coastguard will require information on the oil spill. Report form in section 8.1. Confirm details email. Coastguard will inform the Counter Pollution & Response Branch
Marine Management Organisation (MMO	☎	☎	☎	Phone/email	Emergency pollution response 0300 200 2024 (9am-5pm) Duty Officer 077 7097 7825 (5pm-9am after hours and weekends) Email: dispersants@marinemanagement.org.uk If no response from MMO then call Defra Duty Room:0345 051 8486 (24hr)
Environment Agency Natural England London Borough of Tower Hamlets	☎	☎	☎	Phone/email	Inform of all spills immediately by telephone or fax if spill exceeds 10 litres
Oil Spill Contractor		☎	☎	Phone/email	Contact the 24 hour contact number and ask for the duty manager

6.2 Public Relations/Media Guidelines

Oil spill incidents generally arouse significant public and media attention. In order that the incident response operations can be undertaken efficiently without hindrance from the media and also so that the correct information can be passed onto the public at the correct time, the following guidelines should be followed:

Wherever possible, private VHF/UHF radio channels and telephones should be used as the primary means of incident communication. This can greatly reduce the potential of information being misinterpreted by the media. Digital mobile phones can be regarded as secure unlike earlier analogue models.

Marine VHF is not a secure channel.

All media enquiries are to be directed to the Statutory Harbour Master or their appointed deputy, who will liaise with the relevant Trust Press Officer, rather than to the Oil Spill Management Team (OMT). This allows the OMT to undertake their roles without interruption. The Press Officer will then be able to pass on either approved information through the Preliminary Media Statement shown on the following page or details of press conference timings.

A room should be set aside as a Press Reception Area/Press Conference Room. This room should be away from the Incident Room. The Press Officer will make a room available for this purpose.

The Statutory Harbour Master or their Appointed Deputy should pass on regular SITREPs to the Press Officer, who will then be able to formulate these into a Press Statement, using the form in Section 6.2.2. Press conferences should be held twice per day, if required, to ensure that the correct information is being passed on.

Under no circumstances should any person connected with the incident response speculate to the press as to the cause of the incident, nor comment on any aspect of the response operation.

All enquiries regarding an oil spill incident from the media/public shall be directed to the Statutory Harbour Master or their appointed deputy's office.

Preliminary Media Statement

Timed at: .... **day** ..... **Date**

At …… on ……..... day ....., an oil spill occurred at

(location)……..

The estimated quantity of oil (state type) spilled is ……litres/tonnes; OR
The quantity of oil (state type) spilled is not yet known.

Canal and River Trust at West India and Millwall Docks has initiated appropriate spill response measures..

NEXT PRESS STATEMENT AT ..... HRS

ALL PRESS ENQUIRIES TO “INCIDENT PRESS OFFICE” Canal and River Trust

TEL : (Main Office)
(PR Department)

6.2 Press Statement

Incident Name:	
Date Prepared:	Time Prepared:
Operational Period:	
Start:	Finish:

Message

Contact for further information:	
Approved by:	Date:

SECTION 7: HEALTH AND SAFETY PLAN

7.1 Introduction

Full account must be taken of the health and safety requirements for all personnel involved in oil spill response activities. The Site Specific Health and Safety Plan Assessment Form (Section 7.4) lists site characteristics, site hazards and personal protective equipment and site facility needs.

This Plan is intended to act as an aide-memoire to ensure that all applicable health and safety requirements are considered and appropriate actions are taken.

7.2 Legislation

7.2.1 Employers' Duties

The principal duty of an employer is that imposed by the Health and Safety at Work Act 1974. The Act states, the employer is to ensure, as far as is reasonably practicable, the health, safety and welfare of their employees and anyone else who may be affected by their business activities whilst at work.

The Management of Health and Safety at Work Regulations 1992 impose specific duties on employers to:

- Carry out a risk assessment of their work activities in order to identify protective and preventative measures - significant findings must be recorded if there are five or more employees;
- Make arrangements for the planning, organisation, control, monitoring and review of the preventive and protective measures. When there are five or more employees these arrangements must be recorded;
- Provide employees with appropriate health surveillance, where this is shown to be necessary by risk assessment;
- Appoint a competent person(s) to help ensure compliance with health and safety law;
- Set up emergency procedures;
- Only allow persons with sufficient health and safety instructions to have access to restricted areas;
- Provide employees with comprehensive health and safety information relating to the details above;
- Full co-operation with other employers sharing the workplace;
- Provide the relevant health and safety information to any outside employer working within their premises, including relevant instruction and information;
- Provide the relevant health and safety training to employees; and provide all temporary workers with relevant information on health and safety requirements appropriate to their position within the company.

7.2.2 Employees' Duties

All employees have a duty under The Health and Safety at Work Act 1974, to take reasonable care for the health and safety of themselves and their colleagues at work who may be affected by their acts or omissions.

Under the Health and Safety at Work Act 1974, employees have a duty to co-operate with their employer and colleagues enabling them to comply with statutory duties and requirements.

Additionally, the Health and Safety at Work Act 1974 states that employees must not intentionally or recklessly misuse any equipment and the like provided for them in the interests of health, safety or welfare.

The Management of Health and Safety at Work Regulations 1992 further oblige employees to:

- Use any of the equipment etc. provided in the interests of safety;
- Follow health and safety instructions;
- Report any problem they consider to be a danger; and
- Report any shortcomings in the protection arrangements for health and safety.

7.2.3 Local Population

Canal and River Trust West India and Millwall Docks sits within a small local community

An incident could see increased vehicle movements into the area to deal with both the clean-up and any waste management activities. Therefore, consideration should be given to how this could impact upon the health and welfare of the local community. Close liaison with the local authority emergency planners will be required to ensure seamless operations.

7.3 Site Hazards

7.3.1 Bird Handling

Handling of birds must be carried out by properly trained personnel to ensure the protection of both bird and handler. Wild birds have no understanding of human intentions.

Even a greatly weakened bird can inflict serious injury to handlers, especially to human eyes. Open wounds on hands and arms from such injuries can present opportunities for oily contaminants and disease to enter the handler's blood system.

Bird handling is usually best left to experts, or to volunteers who have had some training. It is easy to put the birds under more stress by chasing and man-handling them. If you see an oiled bird, notify the local Trust ecologist (or Beach Master), who will provide advice on what action to take. If a decision is taken to catch an oiled bird, take the following actions:

Equipment:

- Thick gloves (able to withstand sharp beaks)
- Overalls
- Safety footwear
- Cardboard box with lid of a suitable size to give the bird some room for movement
- Goggles to protect eyes
- Optional long-handled net to help catch bird

Procedures:

- Do not let the bird get close to your head, as it may try to peck your eyes.
- Catch the bird by hand or with the aid of a long-handled net. Do not put the birds under any more stress than necessary.
- Only attempt to capture the bird if it can be done quickly and efficiently.
- Hold the bird with both hands, holding the wings in.
- Put the bird in a cardboard box lined with absorbent material (e.g. newspaper) with a lid.
- Do not wrap the bird up in anything - it may get too hot and this will cause additional stress.
- Take the bird to a cleaning station as soon as possible. Let them know where and when the bird was caught.
- Keep a note of all birds caught and sent to a cleaning station. Make a note of species if possible.

7.3.2 Boat Safety

Boat operators must familiarise themselves and passengers with safety features and equipment on their boats.

- Qualified individuals must operate boats.

- Personnel on boats must wear lifejackets.
- Use of cold water immersion suits is particularly critical under conditions of cold stress.
- Boats should generally not be used after sunset for oil recovery. If this is required or boat use poses minimal risk, areas of operation should be carefully prescribed.
- Individual boat operators should maintain a communication schedule with a shore base. Each boat should be fully equipped with appropriate navigation lights.
- Boat operators must keep their supervisors informed on their area of operation, especially when they change their work area (i.e. if plans call for a boat to move to another location during a shift, the operator should advise the supervisor of their actual time of departure).
- Portable fuel tanks should be filled outside of the boat. All sources of ignition in the area of refuelling should be isolated.
- Personnel working in or operating boats should wear appropriate non-slip footwear.
- Fixed ladders or other substantial access/egress should be provided at boat transfer locations from low water line to platform.
- Workers should be cautioned about using their arms or legs to fend off during berthing, or getting their hands, arms, or legs between vessels and docks or fixed structures.
- The Trust recognises the importance of employing MCA coded workboats; however it is appreciated that in the event of a major incident the exceptional circumstances may require the employment of any available vessels.

7.3.3 Chemical Hazards

Attach appropriate Safety Data Sheets (SDS) for all hazardous substances likely to be used at a spill site.

7.3.4 Hazardous and Noxious Substances

The UK is a signatory to the Hazardous and Noxious Substances Protocol, which has been brought into force by the Merchant Shipping (Prevention of Pollution from Noxious Liquid Substances in Bulk) Regulations 2018

(http://www.legislation.gov.uk/uksi/2018/68/made/data.xht?view=snippet&wrap=true). If a vessel engaged in the carriage of noxious liquid substances in bulk enters the Docks, then the Harbour Master must ensure that their responsibilities under these Regulations are met.

Ports may be required to have in place contingency arrangements to respond to incidents of pollution by chemicals as well as oil, where such vessels use the port. In such circumstances, the appropriate response is to factor an additional response from a specialised contractor with expertise in such substances and to whom the appropriate SDS should be given. Only trained personnel should respond and this is not an area for port personnel trained solely under the OPRC Regulations.

7.3.5 Cold Stress

Cold stress can occur among responders as a result of prolonged exposure to low environmental air temperatures or from immersion in low temperature water. It can lead to a number of adverse effects including:

frostbite;

- chilblains; and
- hypothermia.

- The single most important aspect of life-threatening hypothermia is a fall in the deep core temperature of the body.

Workers shall be provided with warm clothing, rest opportunities, exposure protection, and warm and/or sweet fluids. Boat crew personnel need to wear immersion suits in the water where temperatures are below 15˚, or the combined water and air temperature is less than 48˚ Celsius.

7.3.6 Drum Handling/Manual Handling

Drum handling at a spill site primarily involves drums of waste and contaminated clothing. Several types of drums and containers may be used. These range from 25 to 200 litres in size. All drums and containers must be properly labelled.

If in doubt as to the contents of a drum - seek advice from specialised contractor with regard to product and Port Facility Security Officer regarding ISPS compliance.

Manual lifting and movement of drums should be kept to a minimum. A guide to manual handling is as follows:

- Wear gloves.
- Assess the weight of the load and get help if it is beyond your capacity to lift. Where appropriate use mechanical aids provided.
- Size up the job - remove any obstructions, note any snags and make sure there is a clear space where the load is to be set down. Ensure that you can see over the load whilst carrying it.
- Look out for any splinters, projecting nails, sharp edges or wire.
- Stand close to the object with your feet 20cm to 30cm apart, place one foot in advance of the other, pointing in the direction you intend to move.
- Hold your chin inwards - avoid moving your head backwards or forwards.
- Bend your knees to a crouch position, keeping your back straight.
- Get a firm grip at opposite corners of the load with the palm of the hand and the roots of the fingers. Arms should be as close to the body as possible.
- Lift with your thigh muscles and extend body/straighten your legs.
- Apply the above principles, to any movement such as pushing, pulling, digging, shovelling etc.
- Use the reverse procedure when setting down the load.

7.3.7 Equipment Operations

Heavy Equipment.

- Operators of heavy equipment, such as front-end loaders, graders, and bulldozers must be trained and qualified in their safe operation.
- The operator and banksman must be familiar with agreed signalling techniques. Where appropriate, the banksman should use protective headgear.
- Buckets must not be used for personnel transport.

- Forklifts
- Only trained and authorised operators shall be allowed to operate forklifts.
- Only stable or safely arranged loads that do not exceed the capacity of the truck shall be handled.
- Operators are expected to carry out daily checks of the forklift to be operated. All inspection defects are to be corrected prior to its operation. If it cannot be rectified immediately, the truck should be taken out of service.

7.3.8 Electrical Hazards

Electrical hazards shall be identified and marked with suitable placards, barricades, or warning tape as necessary.

7.3.9 Fatigue

Working long hours without rest may be required, especially during the early phase of response. This, coupled with the stress of the situation and wearing required PPE (Personal Protection Equipment), can contribute to fatigue.

Symptoms include:

- Loss of concentration;
- Errors in judgement;
- Irritability;
- Sleepiness; and
- Soreness and stiffness in joints and muscles.

Rest and sleep are the primary treatments for fatigue. Stress can be addressed by relaxation techniques, such as deep breathing, stretching and taking breaks.

7.3.10 Fire and Explosion

Flammable and combustible materials may be encountered at the spill site. These may be fuels for vehicles and equipment or the spilled material itself; however, other chemicals may be used during the response. Refer to the container label and SDS for more information on these materials.

Precautions should be taken when working with either flammables or combustibles:

- No smoking.
- Store in approved, labelled containers.
- Provide fire extinguishers in areas where these materials are used.

7.3.11 Heat Stress

Heat stress can result whilst responders perform heavy labour work in protective and/or impermeable clothing. This clothing does not breathe or allow for the normal dissipation of body heat.

Heat build-up can lead to a number of adverse health effects including, heat rash, heat cramps, dehydration, heat exhaustion or heat stroke.

The incidence of heat stress is dependent on a number of factors such as temperature, humidity, a person's fitness, age, weight and clothing worn. Therefore, supervisors should continually monitor their employees when workloads are heavy and temperatures and/or humidity are high.

Fluids are to be available at all times and personnel will be encouraged to drink these during rest periods. Shaded rest areas will be made available where feasible.

7.3.12 Air Monitoring

Monitoring Plan:

- Air monitoring at the spill site and surrounding areas will be carried out to ensure site worker and community safety, particularly in the event of a Tier 2/3 incident.
- Air monitoring will be done during site assessment and on each work shift during clean-up activities until results indicate no further monitoring is required.
- All monitoring done at the clean-up site will be documented and the data maintained by qualified personnel on site.

Initial Site Monitoring:

- Monitoring will be done during initial site entry.
- This monitoring is to include checking for:
- Oxygen (O_2) deficiency using a direct reading oxygen meter;
- Flammable atmospheres (% Lower Explosive Limit [LEL]) using a combustible gas indicator; Benzene, hydrogen sulphide and other gases as needed using direct reading instruments, indicator tubes or other accepted methods.
- Competent personnel will carry out tests.
- Instrument calibrations will be carried out prior to use.
- All monitoring will be documented.

Ongoing Monitoring:

- Monitoring for oxygen deficiency and flammable atmospheres will be made if confined spaces are encountered, or as required.
- Monitoring for benzene, hydrogen sulphide or other identified gases will be done at work shift start, as needed.
- Results of site monitoring will be made available to interested parties.

7.3.13 Motor Vehicles

Drivers shall maintain a safe speed at all times and shall not be allowed to operate vehicles in a reckless manner.

7.3.14 Noise

Appropriate hearing protection shall be used in designated high noise areas where personnel noise exposure exceeds 85 dBA, time weighted average over an 8 hour workshift/period. Additionally, no person shall be exposed to greater than 115 dBA at any time without the use of appropriate hearing protection.

7.3.15 Overhead and Buried Utilities

If work has to be carried out near overhead lines, consultation with the organisation that operates the supply system should be undertaken. A safe working distance from these overhead lines should be determined and the area cordoned off.

The estimated location of buried utilities such as sewer, telephone, fuel, electric or water should be predetermined before work begins. Utility companies or owners must be contacted, advised of the proposed work and informed of the urgency of the situation.

7.3.16 Pumps and Hoses

Pumps and hoses may be used at the spill site to apply water, steam or chemical for clean-up and/or decontamination. They may also be used for transfer of liquid waste. Caution should be used when working in these areas where hoses are being used as they represent a tripping hazard.

Additionally, when using pumps and hoses, determine their last contents to avoid unnecessary contamination.

7.3.17 Slips, Trips and Falls

Slips, trips and falls on oily surfaces are the major cause of injuries at an oil spill site. Many of these injuries occur in the first few minutes of work before workers are totally familiar with the conditions and before precautionary measures have been taken.

When entering a spill site, walk slowly and carefully in oil coated areas. Be especially careful when walking on oil covered rocks. Oil resistant safety footwear with non-slip soles should be worn.

It is best to clear an access/egress route than walk through oiled areas.

7.3.18 Helicopter Operations

Helicopter operations may be in use at the spill site for:

- Over flight surveillance;
- Site characterisation;
- Personnel/equipment transport; and
- Rescue/medical transport.

Safe working practices for passengers and other personnel include:

- Passengers must receive a safety briefing from the pilot prior to take off. The briefing shall include, safety features and equipment location on the aircraft, helicopter underwater escape procedures when appropriate and emergency information.
- Passengers and ground crew should approach/depart from the FRONT of the helicopter only when signalled by the pilot and shall never walk under or around the tail rotor or exhaust.
- Loose fitting clothing, hats or other gear, which might be caught in the rotor down wash, must be secured or removed within 100 feet of operating helicopters.
- Passengers shall wear seat belts at all times and personal flotation devices when flying over water.
- Passengers and ground crew shall wear hearing protection (which may include communication headsets) at all times around operating helicopters.
- During emergency landing on water, do not exit until instructed to do so by the pilot after rotor blades stop turning or pilot signals all clear, do no inflate personal flotation devices until outside of the helicopter.

7.3.19 Lifting

- Cranes must be operated in accordance with the manufacturer’s instructions and established construction practices. Only trained and authorised operators shall be allowed to operate cranes.

- Outriggers must be fully extended to assure maximum stability of the equipment.
- Cranes must only be operated where the ground provides adequate support.
- Rigging components must be inspected daily. Only certified wire rope slings or web strops shall be used.
- Each sling or strop must be clearly marked or tagged with its rated capacity and must not be used in excess of this rating.
- Personnel should not be allowed under the jib or load except for the minimum time necessary to hook or unhook the load.

7.4 Site Specific Health & Safety Assessment Form

Site Specific Health and Safety Plan Assessment Form					
1. APPLIES TO SITE:					
2. DATE:		**3. TIME:**		**4. INCIDENT:**	
5. PRODUCT(S):				(Attach MSDS)	
6. Site Characterisation					
6a. Area	☐ Open water	☐ Inshore water	☐ River	☐ Saltmarsh	☐ Mudflats
	☐ Shoreline	☐ Sand	☐ Shingle	☐ Docks	
6b. Use	☐ Commercial	☐ Industrial	☐ Public	☐ Government	☐ Recreational
	☐ Residential	☐ Other			
7. Site Hazards					
	☐ Boat safety	☐ Fire, explosion	☐ Slips, trips and falls		
	☐ Chemical hazards	☐ Heat stress	☐ Steam and hot water		
	☐ Cold stress	☐ Helicopter operations	☐ Tides		
	☐ Drum handling	☐ Lifting	☐ Trenches, excavations		
	☐ Equipment operations	☐ Motor vehicles	☐ Visibility		
	☐ Electrical hazards	☐ Noise	☐ Weather		
	☐ Fatigue	☐ Overhead/buried utilities	☐ Work near water		
	☐ Others	☐ Pumps and hoses			
8. Air Monitoring (Oil company incident)					
	☐ O_2	☐ LEL	☐ Benzene	☐ H_2S	☐ Other
9. Personal Protective Equipment					
☐ Foot Protection		☐ Coveralls			
☐ Head Protection		☐ Impervious suits			
☐ Eye Protection		☐ Personal Floatation			
☐ Ear Protection		☐ Respirators			
☐ Hand Protection		☐ Other			
10. Site Facilities					
☐ Sanitation	☐ First Aid	☐ Decontamination			
11. Contact Details					
☐ Doctor	Phone				
☐ Hospital	Phone				
☐ Fire	Phone				
☐ Police	Phone				
☐ Other	Phone				
12. Date Plan Completed					
13. Plan Completed by					

SECTION 8: WASTE MANAGEMENT PLAN

8.1 Waste Management Operations

The safe handling, transportation and management of oil recovered from an incident is governed by relevant sections in the following legislation:

a) Environmental Protection Act 1990

b) Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1991 (as amended)

c) Control of Pollution (Amendment) Act 1989

d) Controlled Waste (England & Wales) Regulations 2012

e) Environmental Permitting (England and Wales) Regulations 2010 (as amended)

f) Environmental Protection (Duty of Care) Regulations 1991 (as amended)

g) Hazardous Waste Regulations 2005 (as amended e.g. Hazardous Waste (Miscellaneous Amendments) Regulations 2015

h) Waste (England & Wales) Regulations 2011

If oily waste material is produced as a result of a pollution incident, then the polluting party (operator) has a Duty of Care to ensure that the waste is handled, transported and managed (i.e. potentially treated/recovered/disposed of) in an appropriate manner.

If the material is to be handled by contractors, then the operator (to reduce liabilities to a minimum) is to ensure that each contractor has the relevant waste transportation and waste management permits.

The EA is to be consulted on any proposal to store/treat/recover/dispose of waste material to ensure that sensitive wildlife areas such as SSSIs are not affected.

In addition, HMRC is to be notified if recovered oil is brought ashore by dedicated oil recovery vessels. Landing should not be hindered by the absence of an official from HMRC; however, the Operator should maintain a careful log on quantity and nature of the recovered oil. In a Tier 3 incident, waste management routes would be decided upon via the waste management sub-group of the TRG.

Potential options for waste treatment, recovery and/or disposal, be it oily liquids or oiled solids, include:

- On-site treatment: construct a temporary store, clean, stabilise and then recover or re-use waste
- Temporary storage site: construct a temporary store and then take waste to an appropriate disposal site for burial
- Take to a refinery / incinerator (mainly for oily liquids)
- Take direct to an appropriate waste management site

Each option is to be examined in turn with various points for consideration highlighted.

On-Site Treatment

This option aims to temporarily store the waste and then, slowly over the ensuing period, to clean it or stabilise it and then to recover or reuse it.

In most cases this is the best environmental option. It avoids the risk of changing what was a marine oil pollution problem into an inland surface pollution problem or groundwater pollution problem.

From temporary storage, the contaminated waste can be stabilised with cement, lime, clay, organic binders, asphalt and composting. The characteristic of each product needs to be considered when determining the ultimate disposal route or any perceived end use. It is important to note that the treatment of wastes comes under the environmental permitting system. Therefore, any strategy to deal with the waste in this manner can only be developed through close liaison with the local authority concerned and the EA.

Temporary Storage Site

The reasons for constructing a temporary storage site include:

- There is no immediate treatment/recovery/disposal outlet for large quantities of oil / sand mixture or for oil / water mixtures and clean-up cannot be slowed or stopped.
- The equipment used to clean beaches is usually labour intensive and therefore requires an immediate transfer area adjacent to the site to be provided.
- The nature of the roads precludes high traffic densities.
- The in-situ treatment of contaminated material is often preferable to removing large quantities of material from the shoreline.

The temporary storage site, including demountables, may require a permit under the Environmental Permitting Regulations. Each site will have to be constructed in a specific manner. It is therefore essential that the construction of temporary storage sites be done through close liaison with the local authority concerned and the EA.

After due consultation with the EA, temporary storage sites will be identified.

Take to a Refinery / Incinerator (mainly for oily liquids)

The waste should be removed from site by a licensed waste management company, who will then arrange for its recovery and/or disposal in an appropriate manner. If there is suitable access, oily liquids produced from a shoreline clean-up operation can be removed from site by road tanker.

If the oily liquids are onboard a dedicated recovery vessel following an at-sea containment and recovery operation, then it can be transferred across the quay, at a suitable berth, to a road tanker or other suitable waste reception facility. Alternatively, this waste can be fed directly into the reception facility at a marine terminal of an oil refinery. It is the responsibility of the ship's Master to ensure that this waste is managed appropriately. However, the Trust must confirm that any contractors have the necessary permits to handle/treat/dispose of the waste. The waste management route should be agreed with the EA to ensure it meets with their satisfaction.

Take direct to an Appropriate Waste Management Site

All waste management sites require a permit under the Environmental Permitting Regulations. The permit is specific to the type of waste that can be handled/treated/disposed of at the site. There are only a few sites that hold permits that enable them to receive organic or chemically polluting materials (including oily waste). There will be a charge levied by the site operator for managing the waste. In addition, there is a landfill tax / levy applied to all waste deposited in a landfill.

Furthermore, waste oil is likely to be classified as hazardous waste and should be treated as such until otherwise determined. It would therefore be subject to the Hazardous Waste Regulations 2005 (as amended). Mixes of oil / sand and oil / seawater etc. would probably be considered as hazardous waste if the percentage of carcinogenic compounds is above 0.1%. It is therefore likely that oily beach materials and oil / water liquids would have to be handled as hazardous waste. To ensure that oily waste material is transported/treated/disposed of in an meets with their satisfaction.

SECTION 9: TRAINING AND EXERCISE POLICY

9.1 Training Policy

In order to familiarise personnel in the use of this OSCP and to comply with MCA guidelines, oil spill response training courses will be held for selected employees of the Trust, their contractors and port operators with an identified role within the plan. In addition, there will also be awareness briefings with other port users and the agencies who were involved in the consultation process.

After initial training, instructions will be given in the use of the Tier 1 oil spill response equipment located at the Canal and River Trust West India and Millwall Docks. This equipment will be tested and deployed using those Trust personnel who will be responsible for operating this equipment in the event of a spill.

All CRT Harbour Masters hold the MCA4P On-Scene Commander port qualification, provided and certified by an accredited training provider. They will provide mutual aid and assistance in that role in the event of an incident. CRT marine personnel receive accredited MCA1P and 2P training, provided and certified by an accredited training provider. The training records database is held by the Harbour Master and training summaries are provided on the MCA annual return.

9.2 Exercise Programme

To ensure that the OSCP is “user friendly” and understood by all those involved in its use, communications and practical exercises will be undertaken as detailed below. This will include using those personnel who will be responsible for operating equipment in the event of a spill, namely harbour personnel and the Tier 2 contractor.

A record of Personnel Training and Contingency Plan Exercises will be held by the Harbour Master.

The baseline is that every port must incorporate a Tier 2 equipment deployment into an Incident Management Exercise within three years of the approval of its OSCP.

The ‘exercise year’ is counted from the validation of the port’s OSCP. The controlling cycle is the five-year period before the Plan needs to be formally submitted for revalidation. Although a port’s OSCP must be continually developed and updated, the MCA is keen that a structured pre-revalidation review is commenced 12 months before the due date of submission.

If a port considers the three-year Tier 2 deployment cycle to be particularly onerous, they may approach their region’s Counter Pollution and Salvage Officer (CPSO) with what amounts to a request to extend the exercise cycle to four years. This ensures that in all cases the Response aspects of the OSCP are fully tested before the preparation for revalidation commences.

9.3 OPRC Plans – Exercises – MCA Guidance

The following provides guidance on planning and conducting exercises which have been designed to evaluate the contingency plan and include a degree of training for any personnel likely to be involved in an oil spill incident.

Each port/harbour/oil handling facility must participate in exercises in accordance with the provisions within their OPRC-compliant OSCP.

The objectives of any exercise need to be pre-agreed, enabling the exercise planners to tailor the exercise to the needs of the participants. For example, it may be desirable for different aspects of the OSCP to be exercised separately, such as notifications or equipment mobilisation/deployment.

A larger exercise, encompassing all aspects of the response, may not explore the detail of each of these individual themes but will help promote a wider understanding of the purpose and scope of the whole plan. Whatever the scale or type of exercise, the invited participation by the appropriate environmental and regulatory authorities, and others, will aid the collective understanding of the plan, to the benefit of all involved.

The following list gives examples of exercise types that can be undertaken.

Notification Exercise - announced or unannounced

Used to test alert and call-out procedures for response teams, test communication systems, availability of personnel, evaluate travel options and arrangements and test the transmission of information. Such an exercise can be used to check the validity of contact information within the plan and should be carried out at least twice per year.

Mobilisation Exercise

May be used to test the actual mobilisation times of individuals and contracted resources. Ideally, mobilisation should be tested without prior warning, although the requirement for an unannounced callout will need to be balanced against the practical difficulties and financial penalties of doing so. Whilst this important aspect of the response may be exercised in isolation, it may be seen as beneficial to incorporate this as a specific objective within the scope of another of the framework exercises.

Table-Top Exercise

Whilst the degree of complexity can be decided upon by the exercise coordinator, a table-top exercise can be used to test the emergency management knowledge and capability. It provides individual and also team training, enabling personnel to be familiarised with the various roles and responsibilities and identification of resources. A table-top exercise can also explore the interaction between the different parties involved, particularly by testing the principles of the response strategies.

These exercises can be used to test coordination with local authorities and the emergency services. Some organisations, which have peripheral responsibilities, may be role-played. During this exercise, the capability to respond to a Tier 2 type spill and initiate the primary actions in the event of a Tier 3 response can be put to the test. As discussed above, it can be effective to combine this exercise with an equipment mobilisation/deployment exercise, but in any case a table-top exercise of the incident management structure should be incorporated within the exercise programme at least annually.

Incident Management Exercise - requires significant planning

These exercises can test the capability of local teams to respond to Tier 1, Tier 2 and Tier 3 type incidents, providing experience of local conditions and spill scenarios, enhancing individual skills and teamwork, integrating the roles of external bodies and organisations. MCA considers that each port, harbour and oil handling facility *must* hold an Incident Management Exercise, incorporating equipment deployment to a Tier 2 level at least every three years, following initial plan approval.

This is likely to incorporate, or be combined with, a Tier 1 equipment deployment. Such exercises need, so far as possible, to involve actual involved organisations to represent a real emergency. However, if this cannot be achieved, role-playing personnel can be used to simulate roles and responsibilities.

A Balanced Programme of Exercises

Different types of exercises will test different facets of the plan, whilst even the most ambitious Incident Management Exercise cannot be expected to test every aspect of the plan. Notification exercises, which are useful to update contact details within a plan, should be undertaken with greater frequency than equipment mobilisation exercises, for example. Before an exercise takes place, the appropriate authorities should be notified. This notification procedure should be formally documented and a copy of this documentation held and logged within the port / harbour / oil handling facility.

A typical programme of exercise frequency is as follows:

EXERCISE TYPE	FREQUENCY
Notification & Mobilisation Exercises	Twice per year
Table-top Exercise (may incorporate mobilisation and deployment of local response equipment)	Once per year
Incident Management Exercise (IME) (will incorporate mobilisation and deployment of resources up to Tier 2 Level)	Once every 3 years* Could be 4 if approved
• In an instance where a port, harbour or oil handling facility considers this requirement to be unduly onerous on the basis of the risk assessment, they may submit an alternative exercise programme to the Regional CPSO for consideration and approval, on an individual basis. In some circumstances it may be permissible to undertake an Incident Management Exercise in the fourth year of the plan's five-year life-cycle providing for the 'lessons-learned' to be captured within the final plan review/update year.	

* In an instance where a port, harbour or oil handling facility considers this requirement to be unduly onerous on the basis of the risk assessment, they may submit an alternative exercise programme to the Regional CPSO for consideration and approval, on an individual basis.

In some circumstances, it may be permissible to undertake an Incident Management Exercise in the fourth year of the plan's five-year life-cycle, providing for the 'lessons-learned' to be captured within the final plan review/update year.

Sharing of exercises

In a situation where a group of ports and harbours within a distinct geographic region and sharing the same Tier 2 contractor, there may be scope to undertake a joint exercise at one of the ports. Key individuals from nearby ports could be invited to observe or participate, thus gaining from the experience of the hosting port. In any case, each plan holder must host their own exercise involving mobilisation and deployment of their Tier 2 response, at least every three years.

A post exercise/incident form (refer to Section 9.4.1) should be completed and forwarded to the MCA Regional CPSO, and all relevant plan holders, each time an exercise is undertaken. In addition, the Port should submit an annual return to the MCA Regional CPSO by the 31st of January each year, giving a summary of the exercises undertaken, any incidents that have occurred and any new pollution training undertaken (Section 9.4.2).

9.4 Training & Annual Reporting Forms

9.4.1 Post Exercise / Incident* Report

2 x Notification Exercises

2x Tier 1 Mobilisation Exercises

Table Top Exercise

Name of Port/Harbour/Oil Handling Facility:	

Tier Level (T1,2 or 3)		Name exercise / incident	

Names of any other participating ports, harbours or oil handling facilities if joint equipment deployment exercise/incident	

Date of exercise / incident		Time of exercise / incident	

Location of exercise/incident:	

Name of exercise / incident co-ordinator:	

Name of personnel participating in exercise/incident and role played:		List of equipment deployed:	

Name of any other organisations or authorities participating in exercise / incident:	

Details of amendments to be made to the Contingency Plan resulting from this exercise / incident:
(in addition to this form the revision list is to be updated & the appropriate pages within the plan amended & issued to all plan holders)

I can confirm that the details on this form provide a realistic summary of the exercise/incident. Any action points resulting from this exercise/incident have been dealt with accordingly, the relevant documents updated and copies provided to the appropriate bodies for their attention.

Authorised by (name in block capitals):		Position / Job Title:	

Signature:		Date:	

I can confirm that the details on this form provide a realistic summary of the exercise/incident. Any action points resulting from this exercise/incident have been dealt with accordingly, the relevant documents updated and copies provided to the appropriate bodies for their attention.

Authorised by (name in block capitals):		Position / Job Title:	

Signature:		Date:	

* Delete as applicable

9.4.2 OPRC Annual Return Form to the MCA

OPRC Annual Return

Name of Port, Harbour or Oil Handling Facility:			
Annual Return Period:		**to**	
Plan Approval date:			**(5 year life span of plans)**
Summary of Incidents: (include date, source, type and quantity of pollution)			
Summary of Exercises: (include date and type of exercise conducted)			
Pollution Training Undertaken (include date, MCA Level, Name & certificate No.)			
Summary of Amendments: (include date, amendment No., & item(s) changed)			
Signed:	Print:		
Position:	Date:		

This form must be completed by Ports, Harbours and Oil Handling facilities at the end of each calendar year, nil returns are required, by the 31st January and returned to the Regional Counter Pollution & Salvage Officer. Continue on separate sheet if necessary.

PART 3: DATA DIRECTORY

SECTION 10: CONTACTS DIRECTORY

Marine & Coastguard Agency (MCA)

Counter Pollution and Salvage

Hq_counterpollution@mcga.gov.uk

London Coastguard: 020 8312 7380

Environment Agency

EA Incident Communication Service E-mail: ics@environment-agency.gov.uk 24-hour Incident Hotline: 0800 80 70 60

Marine Management Organisation

Emergency pollution response 0300 200 2024 (9am-5pm)

Duty Officer 077 7097 7825 (5pm-9am after hours and weekends)

Email: dispersants@marinemanagement.org.uk

If no response from MMO then call Defra Duty Room:0345 051 8486 (24hr)

Adler & Allan

CRT Approved Tier 2 Responder

24hr Response Number: 0800 592827

E-mail: nationalenquiries@adlerandallan.co.uk

Adler & Allan Duty Manager: dutymanagers@adlerandallan.co.uk

Ensure telephone contact has been established with the Duty Manager **before** using email communications.

Canal & River Trust

Contact the Customer Ops Supervisor for the Docks and the Harbour Master, who will instigate the Oil Spill Contingency Plan (OSCP) - refer to Gateway for contact details.

Out-of-hours, refer to the duty rota to obtain the duty supervisor contact details:

http://gateway/people/safety/ER/Emergency%20Response/Forms/Documents.aspx?RootFolder=%2Fpeople%2Fsafety%2FER%2FEmergency%20Response%2FRotas%2FRotas%202018%2019%2F2%2E%20%20London%20and%20South%20East%20Region%2F London

Canal & River Trust: 0303 040 4040 (during office hours)

0800 4799947 (out-of-office hours)

Contact the local Environmental Scientist (refer to Gateway for contact details), who will instigate the internal Pollution Response Procedure.

Port of London Authority (PLA)

London River House
Royal Pier Road

Gravesend
Kent
DA12 2BG
Office location map

24-hr Incident Line: 020 3260 7711
E-mail: Tbncdo@pla.co.uk

Natural England
Block B, Government Buildings,
Whittington Road
Worcester
WR5 2LQ

24-hr Marine Incident Line: 03000 601200
E-mail: Marine.Incidents@naturalengland.org.uk

London Borough of Tower Hamlets
Town Hall
Mulberry Place
5 Clove Crescent
E14 2BG

24-hr number for Environmental Health: 020 7364 5007
E-mail: environmental.protection@towerhamlets.gov.uk

London Coast Guard
Thames Barrier Navigation Centre
Unit 28
34 Bowater Road
Woolwich
London
SE18 5TF

Phone
02083 127 380
Email: Londonmo@mcga.gov.uk

SECTION 11: RESOURCES DIRECTORY

SECTION 11: RESOURCES DIRECTORY

Dockland Oil Spill Kit

Location	Item	Stock required	Audit	Notes/Action
Oil Spill Container Lock Side	Large white absorbent booms (6mx20cm)	100		
	Medium White absorbent booms (3mx12.5cm)	10		
	Large green absorbent boom (2m)	10		
	Small Yellow absorbent Booms			
	2 Black impervious barrier booms	5		Not oil/absorbent booms per se
	Constant containment booms 20m sections	5		
	Electric Aerator	1		
	110 volt inverter	1		
	Extension lead	1		
	2x2" submersible pumps (110v)			
	Oikl skimmer plus pipes and leads	1		
	Light nylon rope	200m		
	Heavy Duty black plastic sheeting	100m^2		
	200l sealable drums	10		
	PPE	20 sets		
	EA approved oil waste disposable bags			
	Heavy duty black plastic bags	10 rolls 25l bags		
	1x42 petrol engine HSS pump			

11.2 Tier 2

The contract with the Tier 2 responder is summarised below:

Specification for Pollution Control and Response

The detailed requirements for pollution control & response are given below. In addition, the C*ontractor* shall work in accordance with Part A of the Service Information.

Purpose

To provide pollution control & response service across the *Employer's* estate in England and Wales:

- to meet requirements for statutory ports and harbours sites; and
- in support of the *Employer's* direct labour team in responding to larger incidents at other locations.

All works are to comply with current regulatory requirements and standards of best practice that relate to the works during the contract term.

Scope

1) The *Contractor* to provide the Tier 2 emergency pollution response service (as defined in "The Merchant Shipping (Oil Pollution Preparedness, Response and Co-operation Convention) Regulations 1998 (SI 1998 No 1056) and MCA's Contingency Planning for Marine Pollution Preparedness and Response Guidelines for Ports) for statutory ports and harbours sites and other areas identified by the *Employer* in accordance with the call-out requirements in Part A of the Service Information. The designated sites are the *Employer* owned areas at:

- Gloucester & Sharpness Docks
- Liverpool South and Wirral Docks
- London Docklands
- River Ouse (BW port of Howden to Selby)

The Contractor must also be able to undertake exercises, incorporating Tier 2 equipment deployment, with the *Employer* to test Port pollution contingency plans.

2) Additionally there is a requirement for the *Contractor* to provide an emergency response similar to Tier 2, to contain and deal with spills in other areas owned by the *Employer* where the scale of a spill is too large for the *Employer* direct labour call out teams to contain adequately e.g. river navigation spills, extensive spills on reservoirs, spills to ground or to the canal network. Response would normally be required in a situation where there was no identifiable responsible party for the Environment Agency to encourage to carry out containment and clean up. The response time requirement for these additional support activities is a maximum of 4 hours.

3) The *Contractor* is also required to provide a clean-up service where a spill has already been contained to water or to land by the *Employer's* direct labour teams. The response time requirement for these additional support activities is

a maximum of 24 hours, with a same day or next day response time dependent on the nature of the incident. These incidents could be small spills on water that have already been contained, contained spills in buildings/boats/structures, clean-up of a larger spill that has ended, dealing with a patch of oil-contaminated ground or steam-cleaning buildings or boats that have been affected by spills.

The *Employer* may increase the scope of works specified when required.

Health, Safety, Environmental & Heritage Management

The *Contractor* shall complete a specific health and safety risk assessment for each site and section of the work, paying particular attention to water safety, the interface with members of the public, the interface with the *Employers* staff and the highlighted specific Health & Safety hazards outlined below. A safe system of work in the form of a method statement is to be developed from the risk assessment and briefed to all staff involved in the work, prior to commencement.

Specific Health & Safety Hazards

In addition to the requirements above and those in Part A of the Service Information, the *Contractor* is informed of the following potential hazards:

- Oils, unknown chemicals and Contaminated Materials

Pollution control and response will expose the *Contractor* to polluted water, oils, unknown chemicals, absorbents and materials. The *Contractor* shall have procedures to ensure that their staff uses appropriate PPE, equipment and hygiene techniques to ensure their health and safety.

- Lone Working

Pollution control and response may involve lone working. The *Contractor* shall have procedures at least equal to those contained within the Trust's Approved Standard: Lone Working & Personal Safety.

- Slips, Trips and Falls

Pollution control and response will often be in areas where slips, trips and falls are more likely to occur. The *Contractor* shall ensure that all work areas are continually monitored for trip hazards.

- Sharps Hazard

The *Contracto*r may encounter 'sharps' during this work activity and is to ensure all 'sharps', including syringe needles or razor blades, are removed immediately and deposited into an approved 'sharps' container and then disposed of in accordance with current legislation and best practice. Where there is a frequent and regular occurrence of syringes and drug related hazards the *Contractor* will notify the Delegated Service Manager in order that the police can be informed.

- Confined Spaces

Some of the pollution incidents may be located within a confined space. Any operations within a confined space must comply with the Approved Code of

Practice L101 '*Safe Working in Confined Spaces'* and the *Contractor* shall have

procedures at least equal to those contained within the Trust's Mandatory Standard: Working in Confined Spaces.

- Electrical Systems

Any pollution incidents contained in a plant room or electrical installation may present an electrocution hazard. Where emptying is being carried out on these systems the *Contractor* shall ensure their safety and the safety of others by taking adequate measures to isolate the equipment and minimise exposure to harm. Isolators shall be padlocked in the 'off' position; alternatively the plant shall be electrically disconnected. The *Contractor* shall have procedures at least equal to those contained within the Trust's Mandatory Standard: Procedures for Safety of Staff Working on Mechanical & Electrical Plant & Equipment.

The *Contractor* shall reference and follow the specific environmental and heritage guidance and requirements produced in Part A of the Service Information and the highlighted specific aspects below.

Specific Environmental & Heritage Aspects

In addition to the requirements above, the *Contractor* is informed of the following specific environmental and heritage aspects:

Waste Disposal

- The *Contractor* shall manage all waste from incidents in accordance with current regulatory requirements. Many pollutants and contaminated absorbents are classified as hazardous waste and should be contained and securely stored on site prior to removal from site.

- The *Contractor* removing the waste from site must be a registered waste carrier with the EA. The *Contractor* will present The Delegated Service Manager with copies of the Registration of Carriers Certificate and provide any copies of any new Certificate(s) that they receive.
- A consignment note must be completed each time hazardous wastes are transferred from site. This must give a description of the waste, SIC code and European Waste Catalogue (EWC) reference for each waste type. A declaration must be signed on the consignment note to indicate that the waste management hierarchy of options has been applied.
- The *Contractor* must ensure that all waste is transferred to a suitably permitted or exempt facility. The Contractor must provide the Delegated Service Manager with the details of all the waste receiving sites and must be able to provide copies of environmental permits / registered exemptions upon request.

Pollution Control

- The *Contractor* shall not use dispersants or other agents (e.g. bioremediants) without consent from the EA for the type of water course involved, these agents are typically not approved for use on inland waterways. No refuelling of plant or equipment is to take place adjacent to the waterway; all refuelling will be carried out on impermeable surfaces away from the waterway and any drains. Any fuel for generators or pumps should be stored securely within a drip try / plant nappies as appropriate.

Training and Competency

- The *Contractor* shall comply with the minimum training and competency requirements for the contract works as listed in Part A of the Service Information and ensure all their staff comply with any legal and statutory requirements regarding training and competency. Additionally the following requirements are essential:
- The *Contractor* must be a registered member of the The UK Spill Association (UKSpill).
- All staff must understand the emergency procedures to be followed in the event of an incident or pollution incident.
- The *Contractor* must ensure that all staff are trained in the transfer and movement of wastes.

Plant, Work Equipment and PPE

- The *Contractor* shall use equipment which is appropriate in all respects for the task to be performed to ensure the activity is undertaken safely and efficiently. The *Contractor* shall comply with all legal requirements relating to the operation of vehicles and work equipment. If vehicles or work equipment is required for a particular site the *Contractor* shall only use vehicles and work equipment which is appropriate in size and shape to conform to the *Employer* towpath assessments and other site specific restrictions identified. Specific requirements are:

- All vehicles used to deliver the service should carry the appropriate equipment required to adequately deal with the pollution response. The *Contractor* is, as a minimum, required to have access to the following items for use in incident responses: pumps, aerators, diesel site generator, permanent floatation boom, inflatable boom and water ballasted boom, dinghy, rigid boat, self-erecting emergency storage tank, 1000 litre IBC unit, mobile oil and water separator, small weir skimmer, temporary oil storage tanks and bowsers, degreasing chemicals, heavy gauge ''oily waste'' bags, 1 m^3 yard bags and 205 litre drum (clip top and bung top).

- Suitable cones, barriers, tape and fencing will be required to protect and demark the vehicle and working area.

- All the *Contractors* staff should as a minimum wear the PPE as required in Part A of the Service Information and conform to the *Employer* lifejacket policy. All additional PPE requirements should be addressed through the *Contractors* risk assessment and all staff must wear any additional PPE identified. Specific requirements are:

- The *Contractor* shall have procedures to ensure that their staff use appropriate PPE, equipment and hygiene techniques to ensure their protection from exposure to hazardous materials.

Methodology

Information provided by the Employer

The Delegated Service Manager will provide the *Contractor* with details of any pollution control and response via the helpdesk facility. The type and details of the actual spill, exact location, access information and contact details for the *Employers* on site representative. The actual response time required needs to be stated by the Delegated Service Manager and whether it is for example a response to a Tier 2 incident at a port or a next day response to a contained spill.

Preparatory Works

The *Contractor* will undertake an inspection of each work site prior to commencing any works. The following preparatory work shall be undertaken as necessary in order to enable the works to be completed:

- Ensure all the requirements of Section C – Health, Safety, Environmental and Heritage Management have been completed and the necessary management systems are in place.
- Ensure that all staff are sourced to comply with all the requirements of Section D – Training and Competency and that site specific inductions are organised.
- Ensure that the plant, work equipment and PPE selected is appropriate as per Section E – Plant, Work Equipment and PPE.
- Complete an assessment of the actual requirements for the site in terms of any isolation, an exclusion zone or confined space entry.
- Where necessary there will be a need for the *Contractor* to consult with the Coastguard, Port Authorities and the EA.

Task Description

- The general requirements for all pollution response activities are:
- Early direct contact between the *Contractor* and *Employers* on site representative is crucial. On arrival at any incident, the *Contractor* shall inform the site contact (details as provided by the Delegated Service Manager) of their location. The *Contractor* shall advise the Delegated Service Manager and any associated Authorities or Statutory bodies of the need to stop vehicle movements or shut down live equipment, prior to any works commencing.
- The *Contractor* shall use their specialist knowledge and equipment to contain, remove, treat and dispose of the waste as appropriate. The vehicle and working area should be clearly marked to allow the operation to be undertaken.
- The primary aim of the response is to contain any pollution as far as is possible. This will generally involve the deployment of booms or curtains of an appropriate design for surface spills or suspended solids. The Contractor will need to work with *Employers* on site representative to manage water flows to try and contain problems in situ. Preventing spread of pollution may also include protecting by washes and flood weirs to prevent spills escaping into other watercourses.
- The secondary aim is to deal with the pollutant once contained. This may involve capturing a surface pollutant, pumping out oil and water mixes, pumping out other polluted liquids and may also involve the removal or treatment of contaminated ground.
- Transportation of the waste must be undertaken to prevent any spillages or pollution.
- Disposal of the waste must comply with all current legislation.

Housekeeping and Damage

- The *Contracto*r shall be responsible for leaving the site in a clean and tidy state, and for removing from site any waste materials resulting from the service. If waste materials resulting from the service are left on site, the *Contractor* shall make an additional visit, at no charge to the *Employer*, to remove such materials.
- Any damage to the Employers property as a result of providing the service is to be rectified and made safe at the *Contractors* expense. Any such damage should be reported to the Delegated Service Manager within 24 hours of the damage occurring, the report should detail the proposed methodology for rectifying the damage for acceptance by the Delegated Service Manager.

Outputs and Records

- The Contractor is to provide the Delegated Service Manager with the following information:
- Copies of waste transfer notes or hazardous waste consignment notes should be provided to the Delegated Service Manager on completion of the task. These documents must be saved as a '.pdf' file with the file name containing the site location, Waste Transfer Note or Consignment Note (as applicable), month and year. An example would be Liverpool Docks Consignment Note December 2011.pdf.
- Copies of any training and competency records of staff when requested.
- The *Contractor* will present the *Employer* with copies of their Registration to UKSpills Certificate. The Contractor will provide the *Employer* with copies of any new UKSpills Certificate(s) that they receive.

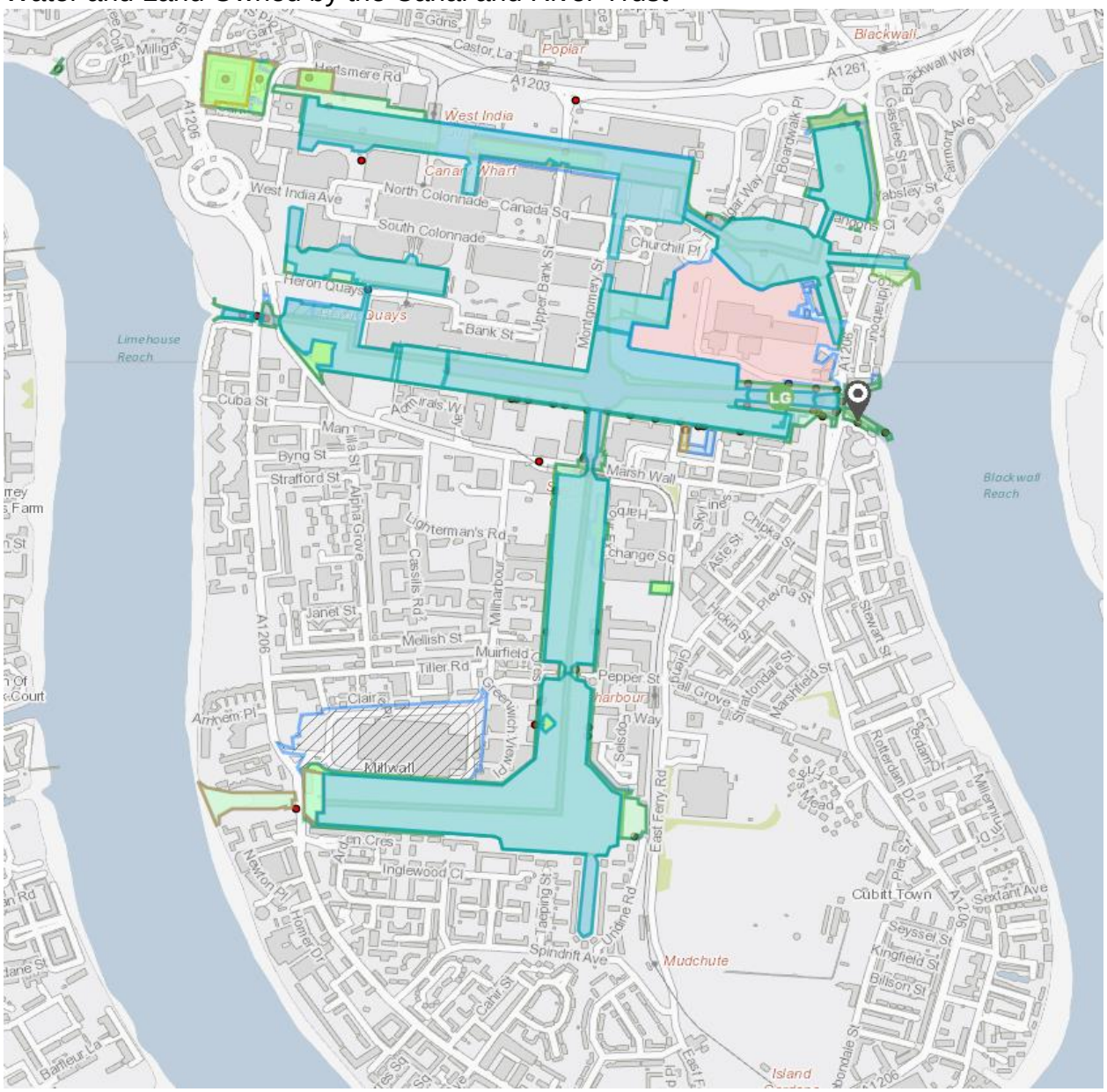
Annex 1

Plan of West India and Millwall Dock System

Context

Detail

Water and Land Owned by the Canal and River Trust



Annex 2: STOp Notices

Counter pollution and salvage Scientific, Technical and Operational (STOp) advice notes

All extant Maritime and Coastguard Agency (MCA) STOp notices may be found at:

https://www.gov.uk/government/publications/scientific-technical-and-operational-advice-notes-stop-notes

and are as follows:

STOp 4/9: Guidelines for the preparation of coastal and Estuarine booming Plans
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/382885/STOp4-2009.pdf

STOp 1/16: Response & Recovery to a Maritime Pollution Incident Impacting the UK Shoreline

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/561672/STOp1-16.pdf

STOp 2/16: Maritime Pollution Response in the UK: The Environment Group

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/561675/STOp3-16.pdf

STOp 3/16: Waste Management Guidance Following a Maritime Pollution Incident in the Uk

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/561675/STOp3-16.pdf

STOp 1/18: Mineral and Vegetable Oil Pollution- Guidance for Shoreline Response

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/561675/STOp3-16.pdf

Review of oil spill incidents at West India & Millwall Docks 2015 – 2018. Identification of recommended actions arising from these.						
Date	**Location**	**Quantity & type of oil spilled**	**Organisation/activity causing spill**	**Description of incident**	**Impact**	**Response**
19/3/15	South Dock by Wood Wharf site	Unstated in records – probably diesel	Canary Wharf Contractors – construction work	Oil spill from sunken tug associated with Canary Wharf Contractor construction activities	Assume oil in water	Unstated in records
25/3/15	South Dock by Bank Street, Heron Quays Rd	45 litres hydraulic oil	Canary Wharf Contractors – construction work	Piling rig hydraulic hose got disconnected from its' connection on the manifold approx. 10m above ground level. Approx. 45 litres of hydraulic oil were discharged from the broken pipe - some was sprayed to the piling mat below and some into the dock water.	Oil in water & oil-stained swan	Absorbent pads & booms deployed promptly to contain and soak-up oil
25/9/15	South Dock by 25 Churchill Place	2000 litres diesel oil	Canary Wharf Management Ltd (CWML) – commercial office	Oil discharged from a roof-top diesel oil tank during refuelling operations. A combination of mechanical failure of the fuel gauge, which resulted in fuel being continually pumped into the tank, and an inherent design fault of the tank overflow system, resulted in diesel escaping through the ventilation pipe and into the dock via a storm drain on the roof.	Oil in water	Tier 2: • CWML deployed boom • CRT deployed further booms, ensured lock remained closed & called-out A&A Tier 2 responders • A&A provided containment & clean-up
Notes: a) Review of on-site spill containment by CWML - The incident highlighted the requirement for greater on-site CWML capabilities for shallow containment of spills and improved accessibility of equipment for easier transportation between waterspaces on the estate. CWML subsequently purchased new oil containment kits; b) Review of spill procedures - CWML & CRT recognised the need to capture and formalise their relationship with regards to incident response and management in the docks; c) CRT asked CWML to review whether other diesel tanks on the estate may have faulty designs; **Actions/recommendations: 1) CRT received feedback from the MCA that they must always take responsibility for containing & cleaning-up oil spills within the docks, whatever the source, due to their statutory responsibilities as Harbour Authority; 2) CRT employee recommended that the level of spill kit available be reviewed as there were not enough booms available for the incident. Recommendation from Tom Oliver for an additional 100m of fence boom (e.g. 2 x 50m booms, 4 x 25m booms –booms must be capable of being linked together).**						
9/2/16	South Dock by lock	100 litres hydraulic oil	Canal & River Trust – lock infrastructure	Oil leak was from one of the lock sluice lift systems.	Oil in sluice chamber & in water	Tier 2: • CRT isolated leaking pump, ensured lock & sluices remained

[1]

							closed (thus containing the spill) & called-out A&A Tier 2 responders • A&A used suction tanker to remove oily water from sluice chamber & lock
Notes: a) Due to unexpectedly high tides, water from the Thames did enter the locks during the clean-up operation – CRT did what was possible to minimise the ingress of water from the Thames during this period; b) It is not possible to physically inspect the lock sluice lift systems for potential oil leaks as this would require the dismantling of the sluice lift systems. Currently, leaking systems are only identified when they cease to perform their function. Instead, it may be possible to identify oil leakages earlier by undertaking regular checks on the oil levels within the associated hydraulic oil tanks as part of a PPM programme. This could be done by operatives or M&E personnel. **Actions/recommendations: 3) Perform weekly checks on oil levels within hydraulic oil tanks around the locks to identify unusual rates of oil loss. Promptly investigate such observations in case they are due to oil leaks.**							
15/9/16	South Dock	Minimal	Unidentified	CWML reported that one of their tenants had observed an oil sheen. Source of oil unknown but suggested by CRT staff as probably being due to contaminated bilge water or a leaking stern gland.	Slight oil sheen on water	Tier 1: • Oil sheen too minor to contain & clean-up. Left to dissipate naturally.	
25/9/16	South Dock, south end of DLR bridge	Minimal amount of diesel	GPS – vandalised sunken tugs	Two dock tugs from GPS (GPS Feluccia and GPS Haulier) sunk. The vessels were roped together. The tugs had diesel in their tanks. The vessels were brought to the surface (on 27-28/9/16) via the use of airbags, with minimal sediment disturbance. Upon investigation by GPS, it was considered that vandalism caused the vessels to sink.	Minor sheen on water; no distress to wildlife	Tier 1: • CRT deployed booms around sunken vessels as a precautionary measure; monitored the salvage operation • GPS called out Adler & Allen as a precautionary measure; placed absorbent pads within the boomed off area to absorb any visible signs of oil;	

						floated sunken vessels
2016/17	South Dock, outer lock	100 litres hydraulic oil	Canal & River Trust – lock infrastructure	Oil leak was from one of the lock sluice lift systems. This was not realised until the equipment did not function and the loss of oil was identified as the cause of this.	Impact was not observed.	No containment/clean-up action taken as oil had either evaporated or been dispersed unnoticed into the Thames. The PLA were notified by CRT as a courtesy, but no pollution in the Thames had been reported.
Actions/recommendations: 3) Perform weekly checks on oil levels within hydraulic oil tanks around the locks to identify unusual rates of oil loss. Promptly investigate such observations in case they are due to oil leaks.						
14/2/17	Blackwall Basin, southern edge	Fresh diesel (as analysed by ESG for CWC)	CWML – surface water drains running through their land	Oil observed coming from a surface water outlet pipe belonging to CWML. See later event in April 2017 for an explanation of the cause of this incident. Documentation later obtained from CWML states the inferred source of contamination was mainly fresh diesel from an overflowing interceptor and storm water chamber, which were later cleaned out. Arup thought that the source of diesel oil in the interceptor was a one-off event, potentially via a third-party action in the Lovegrove Walk area.	Sheen on water	CRT deployed booms and absorbent pads. CWC informed the EA.
Note: This incident reinforces the need to request that oil interceptors associated with surface water discharges into the docks be maintained at recommended frequencies. This would be up to those third parties with discharge agreements to undertake. CRT get an opportunity to specify this during planning consultations for new developments. Could also consider requesting that organisations such as CWML ensure they are maintaining oil interceptors adequately. **Actions/recommendations: 4) Consider requesting that organisations such as CWML ensure they are maintaining oil interceptors adequately.**						
2/4/17	Blackwall Basin, southern edge	Quantity significant – unknown oil leaching out from soil under the waterline along edge of	Canary Wharf Contractors at Wood Wharf – disturbance of either contaminated soil or damage to	As part of investigations into the source of oil, CWC found oil saturated soil down to approx. 4m in an area close to the water's edge. Extent of contamination initially unknown with CWC suggesting that it was an area that was a filled-in dock junction. Prior to the start of development at Wood Wharf,	Significant oil on water around Blackwall Basin	Tier 2: • CRT deployed booms around Basin to prevent the oil spreading • CWC called out VTS; placed absorbent

[3]

		Blackwall Basin – unable to quantify	underground oil storage structure	Arup undertook a land contamination investigation and this oil was not detected. Arup were called back in to investigate the situation. CRT asked that in the short-term, a boom be placed directly along the land to minimise the amount of oil that is entering the water. However, a floating boom will not prevent the oil leaching into the water from the soil column. Therefore, CRT asked that CWC place some form of impermeable barrier down. Documentation later obtained from CWC/CWG states the inferred source of contamination was mainly fresh diesel from an interceptor and storm water chamber, which were cleaned out. There was also contamination in the soil near the drain and at the dock junction. No new contamination events have been identified since April 2017. Arup thought that the source of diesel oil in the interceptor was a one-off event, potentially via a third party in the Lovegrove Walk area. The pipework will be left in place until the future development of the area (in Phase 3).		pads and booms around the edge that was leaking oil; undertook digging to assess extent of soil contamination; asked Arup to conduct a more detailed investigation
18/10/17	Poplar Dock & Blackwall Basin	Hydraulic oil	Boat in Poplar Dock – leak when engine running	Source of oil was from a ruptured pipe on a boat. The boater used pressurised water to clean some of the oil off the boat and pontoon, promoting the oil's dispersion over a wide area. The boat owner then re-started the engine a few times over the ensuing days, causing more oil to leak from the boat. The clean-up costs incurred by CRT via A&A were significant. CRT did not appear to be		Tier 2: • CRT boomed off affected area; identified source; called out A&A Tier 2 responders • A&A provided containment & clean-up

[4]

				able to effectively control the boater's activities.		
Notes: a) Craig Scherer (Quality Control Manager at CWML, Craig.Scherer@CanaryWharf.com) requested that he be added to the e-mail list for future notifications on incidents around the Docks. Lugano Kapembwa (Lugano.Kapembwa@CanaryWharf.com) & Callum Scott (Callum.Scott@CWContractors.com) were notified directly of this incident; b) The clean-up costs incurred by CRT via A&A were significant – at least £65,000. For future incidents, we need to be more aware of the escalation of costs that can arise when using A&A over prolonged periods. **Actions/recommendations: 5) Develop a standard e-mail list for notifying interested parties around the docks of oil pollution incidents and (where relevant) requesting that they ensure their operations are not the cause; 6) Manage more carefully the extent of time that A&A are deployed on containing and cleaning up spills; 7) Where a boater's activities are causing oil pollution, consider what immediate powers can be used to prevent the boater from continuing to cause pollution. Look at the Dock Regulations, Byelaws as well as T&Cs (where relevant).**						
1/6/18	South Dock	50 litres diesel oil, most retained on deck of vessel	Visiting naval vessel – refuelling operation by Thames Marine Services	Vessel diesel tank overfilled during re-fuelling operation.	Naval vessel applied dispersant to spilt oil, which they should not have done.	Tier 1/2: Absorbents used to contain & clean-up oil. Tier 2 contractors (Adler & Allen) put on alert but not deployed.
Actions/recommendations: 8) Ensure that visiting vessels and vessels in marinas are made aware that dispersants must not be used within the docks to break-up oil spills.						
2/11/18	Blackwall Basin	Diesel oil	Boat moored in Blackwall Basin – leak occurred after (not during) refuelling by Thames Marine Services	Oil leaked from a Dutch barge on a residential mooring (called Acacia). The vessel was unmanned at the time of the incident. The oil was emanating from a fuel tank, though no re-fuelling was being undertaken at the time. Reason for leak not fully understood.	Significant oil contamination on water	Tier 2: • CRT deployed boom around leaking boat & placed down absorbent pads. Containment booms placed across entrances to Basin to prevent oil from spreading. Immediate call made to Tier 2 contractors (Adler & Allen) to assist in clean-up. • A&A provided containment & clean-up
Notes: The current batch of absorbent pads deployed by CRT were not very effective at absorbing the red diesel spill.						

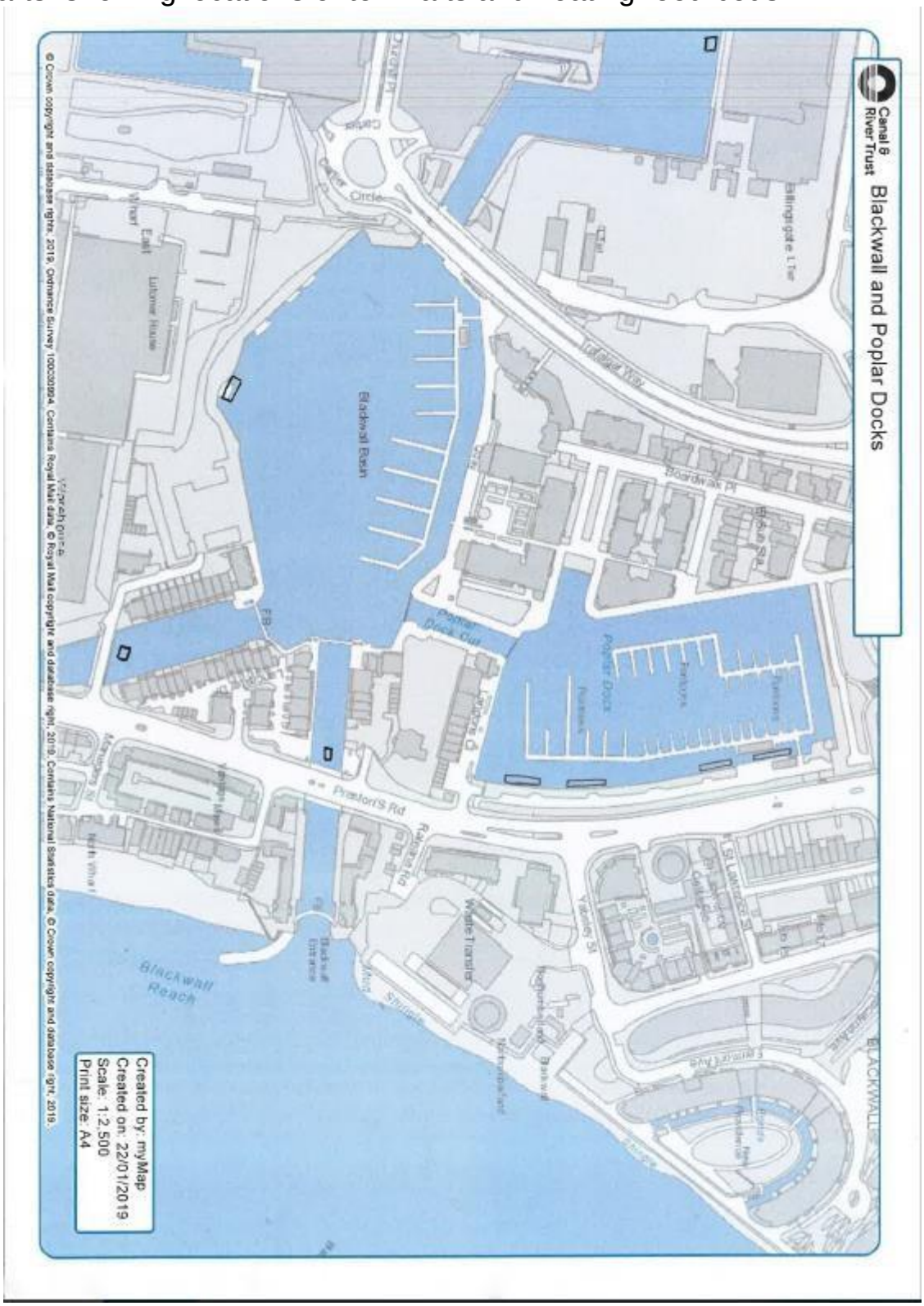
[5]

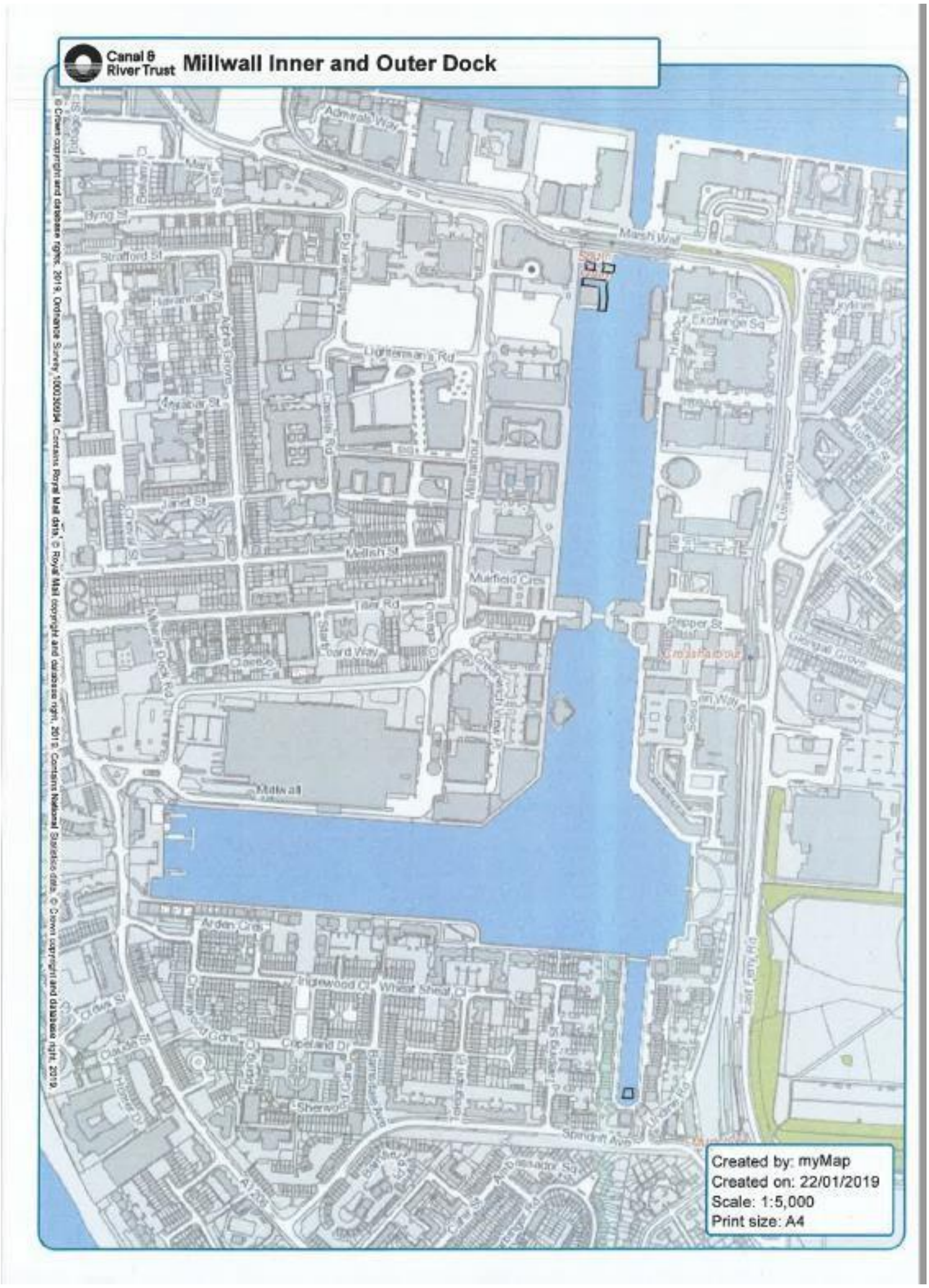
Actions/recommendations: 9) Trial and order more effective absorbent pads for red diesel; 10) Once the quantity of booms and absorbent pads deployed by CRT during an incident is known, promptly order a sufficiently large container to accommodate the waste that will be produced when this equipment is removed from the water; 11) The skirt booms by the Eastern Access bridge & at the entrance to Poplar Dock marina will need to be replaced within 12-24 months to retain their effectiveness; 12) Review the need for a pollution response kit that is easily deployable fast e.g. stored on a mini trailer; 13) Oil-contaminated clean-up material (pads etc) should be swiftly removed from site; 14) Consider whether the oil fuel supply boats (Thames Marine Services) should be under CRT's supervision or observation when re-fuelling next takes place (suggested by Alexe Finley (HMS) & internally). 15) CRT to have spill kit on standby during the next round of re-fuelling by Thames Marine Services. 16) Consider whether CRT should/could require that boats be manned when re-fuelling takes place.

[6]

Annex 5

Charts showing locations of tern rafts and floating reed beds




Canal & River Trust
Millwall Inner and Outer Dock
Admirals Way
Marsh Wall
Byng St
Strafford St
Exchange Sq
Lightermans Rd
Malabar St
Janet St
Mellish St
Muirfield Cres
Tiller Rd
Pepper St
Glengall Grove
Millwall
Arden Cres
Inglewood Cl
Wheat Sheaf Cl
Copeland Dr
Spindrift Ave
East Ferry Rd
Created by: myMap
Created on: 22/01/2019
Scale: 1:5,000
Print size: A4

OIL TRANSFER – SAFETY CHECKLIST AND DELIVERY RECORD; WEST INDIA AND MILLWALL DOCK

Reference: West India and Millwall Dock OPRC Plan, & MSMS (Pt 3) Hbr Master Directions

Supplying Company		Address		
Supply Vessel		IMO Number		
Receiving Vessel		IMO Number		
Agent		Berth		
Date		Start/Stop time		
Quantity Delivered		MGO/IFO		

Checklist to be completed by the persons responsible for the transfer of oil to the vessel before the transfer commences.

		Supply Vehicle	Receiving Vessel
1	Is the vessel moored safely?		
2	Is there safe access between vessel/vessel and the shore?		
3	Are “NO SMOKING” requirements being observed		
4	Can the vessel receive the total quantity to be delivered?		
5	Is the correct fire-fighting equipment readily available?		
6	Is there an agreed communication procedure?		
7	Have the procedures for pumping been agreed?		
8	Have the emergency shutdown procedures been agreed?		
9	Are the delivery hoses securely rigged and free from twists?		
10	Does the bunker connection have the correct gasket?		
11	Are the bunker hoses secured Properly		
12	Are the both vessel’s scuppers plugged?		
13	What is the agreed pump rate?		
14	Are both vessels compliant with the port OPRC and Harbour Master Directions		

Declaration: We have checked the items on the above list for our respective vehicle/vessel and have satisfied ourselves that the entries we have made are correct to the best of our knowledge.

For supply vehicle	For receiving vessel
Name	Name
Signature	Signature

The completed form is to be delivered to Canal & River Trust prior to the vessel’s departure.