



Department of
Transport

OFFSHORE PETROLEUM INDUSTRY GUIDANCE NOTE

Marine Oil Pollution: Response and Consultation Arrangements

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Offshore Petroleum Industry Guidance Note

Marine Oil Pollution: Response and Consultation Arrangements

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Abbreviations

AMOSC	Australian Marine Oil Spill Centre
AMSA	Australian Maritime Safety Authority
DMIRS	WA Department of Mines, Industry Regulation and Safety
DoT	WA Department of Transport
FOB	Forward Operating Base
HMA	Hazard Management Agency
ICC	Incident Control Centre
IGA	Inter-Governmental Agreement on the National Plan to Combat Pollution of the Sea by Oil and other Noxious and Hazardous Substances
IMT	Incident Management Team
JSCC	Joint Strategic Coordination Committee
MEECC	Maritime Environmental Emergency Coordination Centre
MEER	Maritime Environmental Emergency Response
MOP	Marine Oil Pollution
National Plan	National Plan for Maritime Environmental Emergencies
NOPSEMA	National Offshore Petroleum Safety and Environmental Management Authority
OPEP	Oil Pollution Emergency Plan
OPGGSA	<i>Australian Government Offshore Petroleum and Greenhouse Gas Storage Act 2006</i>
OPICC	Offshore Petroleum Incident Coordination Committee
OSCP	Oil Spill Contingency Plan
SEMC	State Emergency Management Committee
SMEEC	State Maritime Environmental Emergency Coordinator
the Act	<i>Emergency Management Act 2005</i>
the Regulations	Emergency Management Regulations 2006
State Hazard Plan - MEE	WA State Hazard Plan for Maritime Environmental Emergencies

1 Purpose

The purpose of this Guidance Note is to inform Offshore Petroleum Titleholders (Petroleum Titleholders) of the Western Australian (WA) emergency management arrangements in respect to Marine Oil Pollution (MOP) incidents in State waters. The Guidance Note outlines Petroleum Titleholders obligations under those arrangements and the Department of Transport's (DoT's) expectations.

This Guidance Note also informs Petroleum Titleholders of DoT's consultation requirements during the preparation of an Environment Plan (EP), an Oil Pollution Emergency Plan (OPEP) or Oil Spill Contingency Plan (OSCP), and ongoing consultations where relevant.

2 Scope

This Guidance Note applies to all offshore petroleum activities with the potential to cause a MOP incident in WA State waters (Figure 1). These activities may occur in shallow coastal or deep oceanic environments in State or Commonwealth waters.

This Guidance Note is relevant to the consultation requirements of both relevant State and Australian Government offshore petroleum legislation.

3 Related Documents

This Guidance Note should be read in conjunction with the Western Australian State Hazard Plan for Maritime Environmental Emergencies: (State Hazard Plan – MEE) and other related documents listed in Section 12.

4 Offshore Petroleum Industry Regulatory Agencies

The WA Department of Mines, Industry Regulation and Safety (DMIRS) is the regulatory agency for petroleum activities in State waters and lands under the WA Petroleum (Submerged Lands) (Environment) Regulations 2012, the WA Petroleum and Geothermal Energy Resources (Environment) Regulations 2012 and the WA Petroleum Pipelines (Environment) Regulations 2012 (State petroleum regulations).

DMIRS is responsible for the assessment, approval and compliance of OSCP's related to petroleum activities in State waters.

The National Offshore Petroleum Safety and Environmental Management Authority (NOPSEMA) have responsibility for safety, well integrity and the environmental management of the offshore petroleum industry within Australian Government waters in accordance with the Australian Government *Offshore Petroleum and Greenhouse Gas Storage Act 2006* (OPGGSA) and associated regulations (Australian Government petroleum regulations).

NOPSEMA is responsible for the assessment, acceptance and compliance of OPEP's related to petroleum activities in Commonwealth waters, referred to as 'Offshore Area' in the OPGGSA.



Figure 1 - State Waters of Western Australia

5 Offshore Petroleum Incident Coordination Framework

The Australian Government has agreed that in responding to offshore petroleum incidents originating in Australian Government waters, a central incident coordination committee be convened and chaired by the Department of Industry, Innovation and Science. The committee is known as the Offshore Petroleum Incident Coordination Committee (OPICC).

The purpose of OPICC is to effectively coordinate the Australian Government efforts and resources, and communicate to the public and affected stakeholders all matters relevant to a significant offshore petroleum incident that originates in Commonwealth waters.

It should be noted that the OPICC is not a mechanism to deploy Australian Government resources, exercise incident control or implement operational response arrangements.

6 WA Marine Oil Pollution Emergency Management Arrangements

In accordance with the Western Australian *Emergency Management Act 2005* (the Act) and Emergency Management Regulations 2006 (the Regulations), the WA DoT is the Hazard Management Agency (HMA) for the MOP hazard in State waters.

The MOP hazard is prescribed in the Regulations as an;

‘actual or impending spillage, release or escape of oil or an oily mixture that is capable of causing loss of life, injury to a person or damage to the health of a person, property or the environment’.

In accordance with the Act, the State Hazard Plan - MEE has been formulated by the HMA and approved by the WA State Emergency Management Committee (SEMC).

State Hazard Plan - MEE prescribes the management arrangements for the prevention of, preparation for, response to and recovery from a MOP incident in order to minimise the impacts of MOP from vessels, offshore petroleum activities and other sources in State waters.

The WA Government is a signatory to the 2002 Inter-Governmental Agreement on the National Plan to Combat Pollution of the Sea by Oil and other Noxious and Hazardous Substances (IGA). The IGA commits the Australian Government and State/Territories to implement and maintain a National Plan for Maritime Environmental Emergencies (the National Plan).

The National Plan sets out the national arrangements, policies and principles for the management for MOP. It defines obligations of the States and various industry sectors in respect to MOP prevention, preparation, response and recovery.

The IGA also commits the State to nominate a responsible Jurisdictional Authority to manage MOP emergencies in State waters and nominate an officer of the DoT to be the State Maritime Environmental Emergency Coordinator (SMEEC) during an incident.

In effect, the above arrangements prescribe DoT as the Jurisdictional Authority for a MOP incident in State waters. They also identify DoT as the HMA for a MOP incident in State waters.

6.1 Hazard Management Agency and State Maritime Environmental Emergency Coordinator Responsibilities

The HMA has overall responsibility for ensuring there is an adequate response to a MOP incident in State waters, including those resulting from a petroleum activity originating in Commonwealth waters.

In these instances the provision of an adequate response will be primarily achieved through the coordinated employment of the Petroleum Titleholder's resources.

During an actual or impending MOP incident in State waters, the HMA, or their designated proxy, will assume the role of SMEEC. The SMEEC provides overall strategic management of the response and executive level support and guidance to the Incident Controller.

DoT's Maritime Environmental Emergency Response (MEER) unit assists the HMA and DoT to fulfil their statutory obligations in respect to a MOP incident in State waters.

6.2 Control Agency/Controlling Agency Responsibilities

The Controlling Agency is the agency or company assigned by legislation, administrative arrangement (such as State Hazard Plan - MEE) or within the relevant contingency plan to control the response activities to a MOP incident. The Controlling Agency also has responsibility for appointing the Incident Controller who is competent to undertake the incident control function at a level commensurate with the defined level of incident.

In accordance with State Hazard Plan - MEE, the Controlling Agency for a Level 1 MOP incident in State waters resulting from an offshore petroleum activity is the Petroleum Titleholder. The Controlling Agency for a Level 2/3 MOP incident in State waters resulting from an offshore petroleum activity is DoT.

In accordance with the National Plan, the Control Agency for a Level 1/2/3 MOP incident in Commonwealth waters resulting from an offshore petroleum activity is the Petroleum Titleholder.

Further details on the responsibilities for response are contained within Section 4 of the State Hazard Plan - MEE or Section 5 of the National Plan.

6.3 Petroleum Titleholder Responsibilities

Petroleum Titleholders have a legislated responsibility for managing oil spill risks of petroleum activities under the WA Petroleum (Submerged Lands) (Environment) Regulations 2012, the WA Petroleum and Geothermal Energy Resources (Environment) Regulations 2012, the WA Petroleum Pipelines (Environment) Regulations 2012 and the Australian Government Offshore Petroleum and Greenhouse Gas Storage (Environmental) Regulations 2009. This includes the requirement to prepare and maintain an approved/accepted OSCP/OPEP setting out adequate arrangements for responding to and monitoring oil pollution.

DoT's role as the Controlling Agency for a Level 2/3 MOP incident in State waters does not negate the requirement for Petroleum Titleholders to have appropriate plans and resources in place to adequately respond to a MOP incident in State waters commensurate with their level of introduced risk.

For any Level 2/3 MOP incident, it is an expectation that the Petroleum Titleholder will conduct initial response actions in State waters as necessary in accordance with their OSCP/OPEP and continue to manage those operations until formal handover of incident control to DoT is completed.

To assist DoT in assuming formal incident control, the nominated DoT Incident Controller will establish contact with the relevant Petroleum Titleholder Incident Controller and work through the Controlling Agency Transfer Checklist at Appendix 1.

Upon establishment of incident control by DoT, the Petroleum Titleholder is expected to continue to provide planning and resources in accordance with their OSCP/OPEP. This will include response assets and contracts specified in their OSCP/OPEP, such as those pertaining to waste management, transport and personnel as well as their response arrangements with the Australian Marine Oil Spill Centre (AMOSC) and other third party responders.

In performing the Controlling Agency function, DoT will use the Petroleum Titleholder's approved/accepted OSCP/OPEP as a starting point for all aspects of a response. DoT reserves the right to deviate from the OSCP/OPEP in circumstances where there is a justifiable cause, in consultation with the Petroleum Titleholder. In this instance, the Petroleum Titleholder may consult with DMIRS/NOPSEMA on any possible compliance ramifications.

6.4 Single Jurisdictional Arrangements

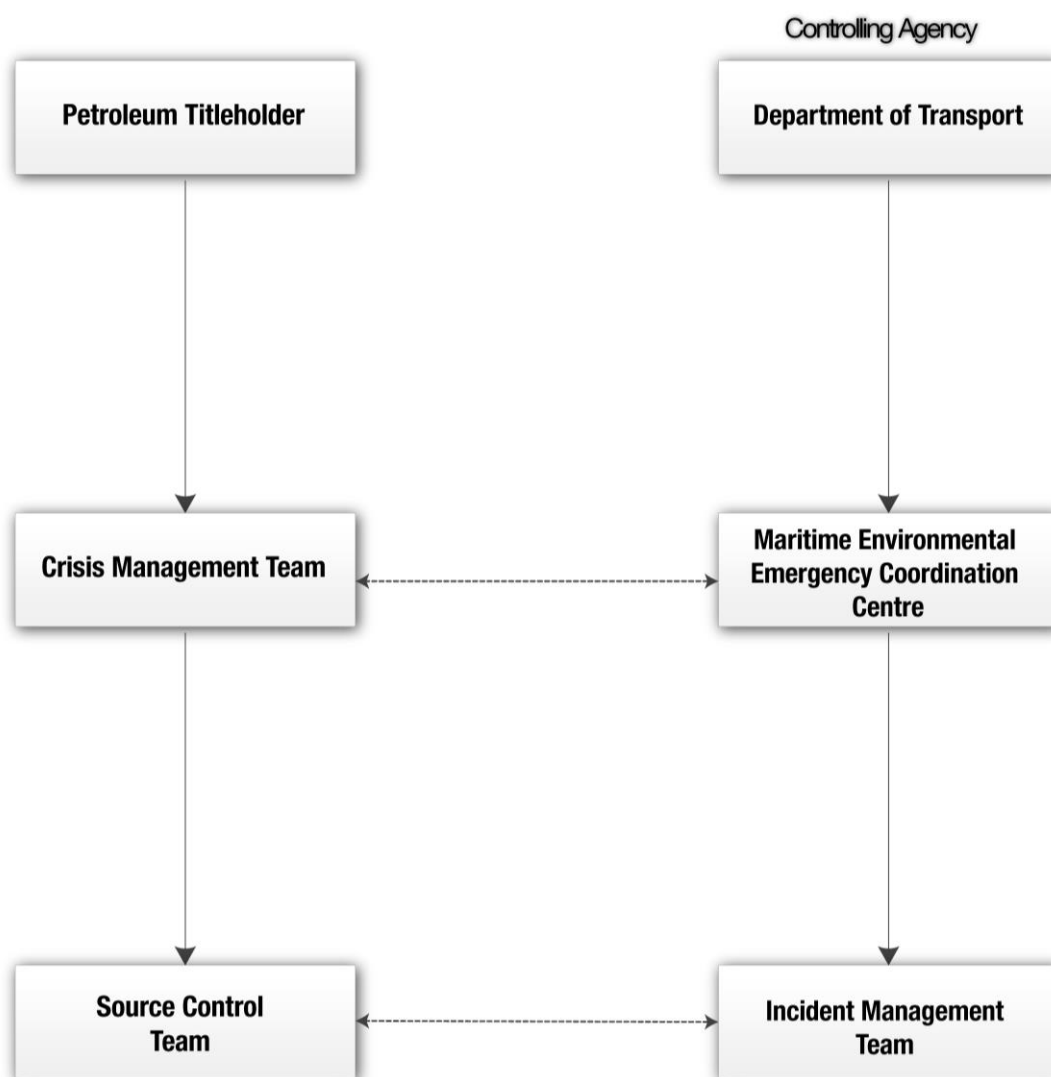
In the context of this Guidance Note, a Single Jurisdiction MOP incident is one where the spill source originates in State waters.

In the event that a MOP incident resulting from an offshore petroleum activity situated in State waters escalates from Level 1 to Level 2/3, DoT will assume the function of Controlling Agency.

In fulfilling its obligations as Controlling Agency, DoT will require the relevant Petroleum Titleholder to work in partnership with DoT to ensure an adequate response is provided.

DoT's role of Controlling Agency will not extend to response operations directly associated with source control or relief well drilling. Management of these operations will be performed by the Petroleum Titleholder. In such instances coordination measures, such as the deployment of Liaison Officers, may be required between DoT's MOP Incident Management Team (IMT) and the Petroleum Titleholder Source Control Team.

The Controlling Agency coordination arrangements for a Single Jurisdiction Level 2/3 MOP incident are outlined in Figure 2.



Note — DoT IMT contains an appropriate number of appropriately qualified persons from the Petroleum Titleholder in key areas commensurate with their level of introduced risk.

Figure 2 – Controlling Agency Coordination Arrangements - Single Jurisdiction

6.4.1 Incident Management Team – Single Jurisdiction

In the event of a Level 2/3 MOP incident resulting from an offshore petroleum activity situated in State waters, DoT will establish an IMT in Fremantle.

In this instance the Petroleum Titleholder will be required to provide an appropriate number of appropriately qualified personnel for the DoT IMT as outlined in Section 6.8.

Further details on the Hazard Management Structure / Arrangements are contained within Section 4 of State Hazard Plan - MEE.

6.4.2 Controlling Agency Transfer Protocols – Single Jurisdiction

In the event of a transfer of Controlling Agency from the Petroleum Titleholder to DoT for a Single Jurisdiction MOP incident, the SMEEC will confirm all relevant protocols with the nominated Petroleum Titleholder CMT Leader. These matters will include, but not be limited to:

- Timing of DoT formally assuming the function of Controlling Agency and any relevant transitional arrangements.
- Required ongoing commitment from the Petroleum Titleholder in respect to response personnel, including members of the IMT and operational teams.
- Required ongoing commitment from the Petroleum Titleholder in respect to response resources and funding arrangements.
- Requirements pertaining to ongoing Public Information efforts, particularly with respect to media management.
- Protocols relating to source control and relief well drilling and associated communications between DoT and the Petroleum Titleholder.
- Protocols to ensure resolution of issues of any matters of concern between the State of Western Australia, through the SMEEC, and the Petroleum Titleholder.
- Protocols to ensure effective coordination and communications between the Australian Government, State of Western Australia and the Petroleum Titleholder.

Arrangements will then be made for the DoT Incident Controller to work through the Controlling Agency Transfer Checklist (Appendix 1) with the relevant Petroleum Titleholder Incident Controller.

6.4.3 Conflict Resolution between DoT and the Petroleum Titleholder – Single Jurisdiction

If matters of contention involving response activities in a single jurisdiction MOP incident cannot be resolved at IMT level between DoT and the Petroleum Titleholder, the matter is to be referred to the SMEEC for a resolution. If necessary, the SMEEC may consult with the HMA and/or Petroleum Titleholder's nominated senior point of contact and/or DMIRS prior to making a determination on a matter requiring resolution.

6.5 Cross Jurisdictional Arrangements

In the context of this Guidance Note, a cross jurisdiction MOP incident is one that originates in Commonwealth waters and results in DoT exercising its HMA obligations in respect to actual or impending response activities in State waters.

Where State waters are impacted by a Level 2/3 MOP incident resulting from an offshore petroleum activity in Commonwealth waters, DoT will only assume the role of Controlling Agency for that portion of the response activity that occurs within State waters as detailed in Appendix 2 (Lead IMT Responsibilities).

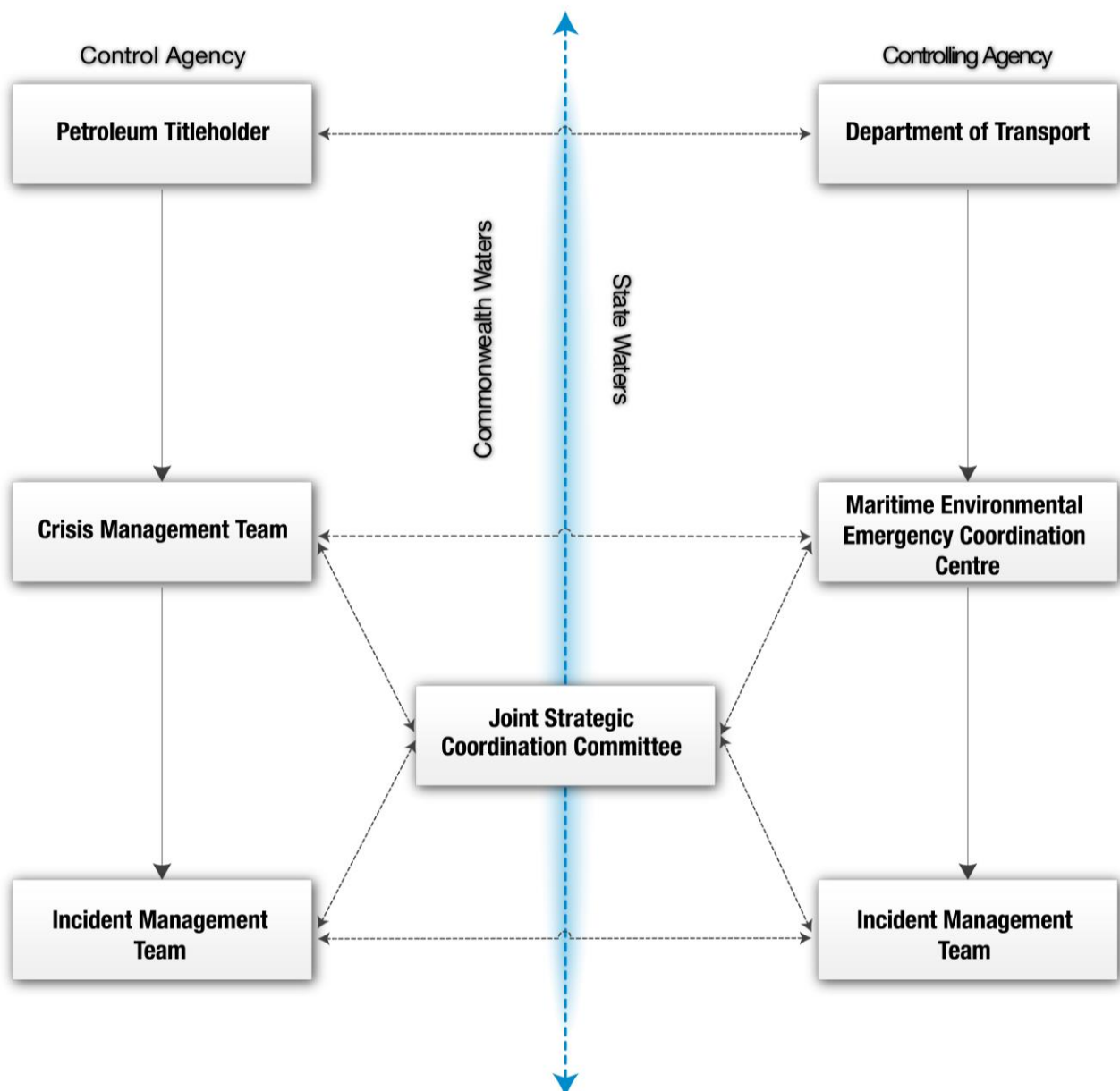
In all cross jurisdiction MOP emergencies beyond Level 1, DoT will establish an IMT as detailed in Section 6.4.1. In this instance the Petroleum Titleholder is required to provide an appropriate number of appropriately qualified personnel for the DoT IMT as outlined in Section 6.8.

In fulfilling its obligations as Controlling Agency, DoT will require the relevant Petroleum Titleholder to work in partnership with DoT to ensure an adequate response is provided across the entire incident.

To facilitate effective coordination between the two Controlling Agencies and their respective IMT's, a Joint Strategic Coordination Committee (JSCC) will be established. The JSCC will be jointly chaired by the SMEEC and the Petroleum Titleholder's nominated Crisis Management Team (CMT) Leader and will comprise of individuals deemed necessary by the chairs to ensure an effective coordinated response across both jurisdictions.

The CMT Leader may be represented at the JSCC by a proxy who is able to act on behalf of the CMT Leader.

The Controlling Agency coordination arrangements for a Cross Jurisdiction MOP incident are outlined in Figure 3.



Note — DoT IMT contains an appropriate number of appropriately qualified persons from the Petroleum Titleholder in key areas commensurate with their level of introduced risk.

Figure 3 – Controlling Agency Coordination Arrangements - Cross Jurisdiction

The overall coordination arrangements for a Cross Jurisdictional MOP incident is outlined in Figure 4.

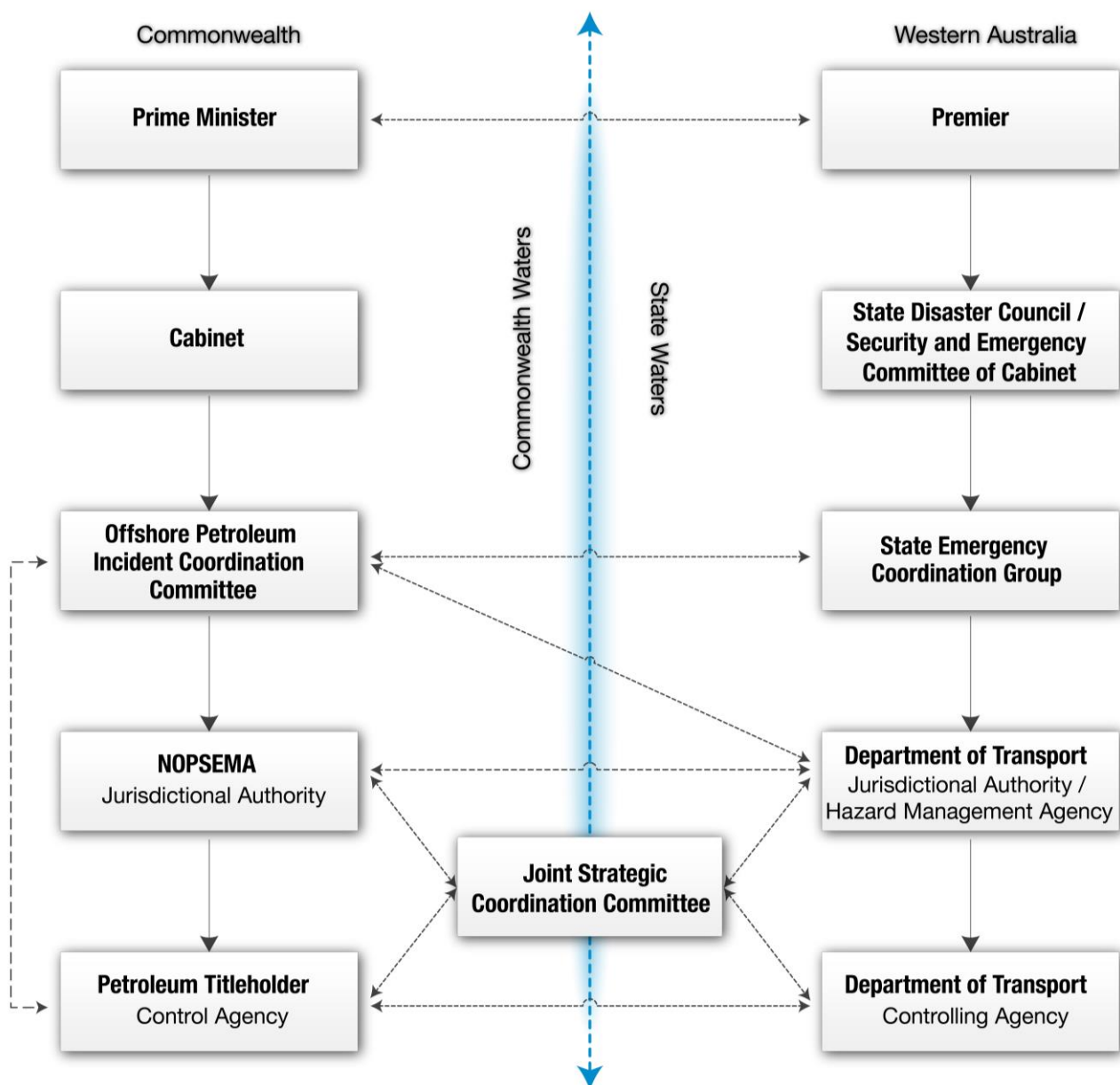


Figure 4 – Overall Coordination Arrangements - Cross Jurisdiction

6.5.1 Joint Strategic Coordination Committee – Cross Jurisdictional

The role of the JSCC is to ensure appropriate coordination between the respective IMTs established by multiple Controlling Agencies.

The key functions of the JSCC include:

- Ensuring that the key objectives set by multiple IMTs in relation to the MOP incident are consistent and focused on achieving an effective coordinated response.
- De-conflicting competing priorities between multiple IMTs.

- De-conflicting competing requests for resources between the multiple IMTs, including those managed by Australian Maritime Safety Authority (AMSA), such as national stockpile equipment, dispersant aircraft and the National Response Team.
- Resolution of significant strategic issues as they arise during the incident response.
- Ensuring that there is a single shared understanding of the concept of operations for the response and resolution of any controversial actions.
- Ensuring that there is a shared understanding of the incident situation and its meaning amongst all key stakeholders.
- Ensuring there is agreement on how information is communicated to the public, particularly those issues that have actual or perceived public health implications.
- Ensuring adequate coordination and consistency is achieved in relation to access and interpretation of intelligence, information and spill modelling to promote a common operating picture.

It is important to note that the JSCC is a committee, not a team operating from a specified location. The JSCC will be administered by DoT and the inaugural JSCC meeting will be convened by the SMEEC once both the Petroleum Titleholder and DoT formally assume the role of Control/Controlling Agency.

The JSCC will be jointly chaired by the SMEEC and the Petroleum Titleholder's nominated CMT Leader and will comprise of individuals deemed necessary by the chairs to ensure an effective coordinated response across both jurisdictions. The CMT Leader may be represented at the JSCC by a proxy able to act on behalf of the CMT Leader.

It is anticipated that NOPSEMA, as the relevant Jurisdictional Authority in Commonwealth Waters, will be represented on the JSCC.

Further details on the DoT Hazard Management Structure / Arrangements, including the composition and role of the Maritime Environmental Emergency Coordination Centre (MEECC), are contained within Section 4 of State Hazard Plan - MEE.

6.5.2 DoT Liaison Officer Responsibilities – Cross Jurisdictional

Where State waters may be impacted by a MOP incident in Commonwealth Waters, DoT will send a DoT Liaison Officer to the Petroleum Titleholder's Incident Control Centre (ICC) or equivalent control facility. The role of the DoT Liaison Officer will be to:

- Facilitate effective communications between DoT's SMEEC / Incident Controller and the Petroleum Titleholder's appointed CMT Leader / Incident Controller.
- Provide enhanced situational awareness to DoT of the incident and the potential impact on State waters.
- Assist in the provision of support from DoT to the Petroleum Titleholder.
- Facilitate the provision technical advice from DoT to the Petroleum Titleholder Incident Controller as required.

In the event that DoT assumes the role of Controlling Agency for the State waters response, the DoT Liaison Officer in the Petroleum Titleholder's ICC will revert to the position of Deputy Incident Controller – State waters, reporting to the DoT Incident Controller. The duties of the Deputy Incident Controller – State waters remains as listed above.

6.5.3 Controlling Agency Coordination Protocols – Cross Jurisdiction

Either prior to, or upon, DoT assuming the function of Controlling Agency for response operations in State waters, the SMEEC will confirm all relevant protocols with the nominated Petroleum Titleholder representative, as shown in Section 6.4.2.

The SMEEC will also confirm arrangements relating to the establishment and operation of the JSCC.

Arrangements will then be made for the DoT Incident Controller to work through the Controlling Agency Transfer Checklist (Appendix 1) with the relevant Petroleum Titleholder Incident Controller.

6.5.4 Lead IMT – Cross Jurisdiction

In the instance that both the Petroleum Titleholder and DoT establish a separate IMT to control response activities in their respective area of control, then one of the IMT's will adopt the role of 'Lead IMT' for some response functions. This measure will facilitate greater coordination and efficiency of effort for some functions that apply across the entire incident response.

Where a 'Lead IMT' is not designated, then both IMT's will be expected to control that function within their area of control.

Unless otherwise agreed during the inaugural JSCC meeting, the allocation of IMT functions and designation of 'Lead IMT' will be as detailed in Appendix 2.

During an incident, any matters pertaining to this arrangement that cannot be addressed through direct communications between the two IMT's can be referred to the JSCC for joint resolution.

6.5.5 Use of DoT Resources

During an offshore petroleum incident with an actual or impending Level 2/3 oil spill in State waters, the DoT will take the necessary actions to fulfil its obligations as the Controlling Agency in State waters.

This will include DoT deploying its own resources, where available, in addition to the resources that will need to be provided by the relevant Petroleum Titleholder to come under DoT control.

These DoT resources comprise both personnel and equipment. Personnel will be predominantly comprised of State Response Team personnel including both DoT employees and non-DoT employees.

Equipment is assigned to functional kits that include:

- Shoreline Clean-up Assessment Technique kits,
- Shoreline Clean-up kits,
- Inshore Booming kits and
- Divisional Staging Area kit.

Kit components change according to DoT requirements and are located in Fremantle, Karratha and Albany. Inshore support vessels may also be deployed.

The deployment of DoT resources will be managed by DoT. DoT would then seek to recover any associated costs at a later date from the relevant Petroleum Titleholder.

Where it is necessary to deploy resources, DoT's preference will be to utilise its own kits and personnel. DoT has a high degree of familiarity and confidence in its own response resources compared to those that may be provided by industry.

Concurrent with the initial deployment of DoT resources, it is expected that the Petroleum Titleholder would commence deploying pre-determined response equipment and personnel to the nominated Divisional Staging Area/s in accordance with its OSCP/OPEP under the assumption that DoT's resources will require supplementation.

While the Petroleum Titleholder's OSCP/OPEP may reference DoT's equipment and intentions, it does not negate the core obligation of the Petroleum Titleholder to be able to deploy adequate resources commensurate with their level of introduced risk, as detailed in Section 6.3.

For responses in remote locations DoT would rely on the logistics arrangements of the Petroleum Titleholder in order to transport response kits from a nominated staging location to the incident location. In this instance, DoT would deploy its equipment to the nominated staging location for deployment at the earliest opportunity.

The Petroleum Titleholder is the Lead IMT for the management of quarantine processes where such arrangements already exist, as part of their operations. In these instances, Petroleum Titleholders may need to consider pre-deployment of adequate response kits.

6.5.6 Conflict Resolution between DoT and the Petroleum Titleholder – Cross Jurisdiction

If matters of contention involving response activities related to both State waters and Australian Government waters cannot be resolved at IMT level between DoT and the Petroleum Titleholder, the matter is to be referred to the JSCC for a joint resolution.

Where resolution is not possible at the JSCC, and DoT is of the view that it is a possible compliance matter, it will be referred to NOPSEMA.

6.6 Jurisdictional Arrangement Changes during an Incident

During the course of an incident it is possible that more than one jurisdictional arrangement may be applicable. For example, an incident may begin as a single jurisdictional arrangement in Commonwealth waters. If the incident then transitions to a response in both State and Commonwealth waters, cross jurisdictional arrangement is required. Finally, if the response in Commonwealth waters is terminated, the incident becomes a single jurisdictional arrangement in State waters.

In circumstances where more than one jurisdictional arrangement is required, IMT structures may transition between Single and Cross Jurisdictional structures. Transitions should follow protocols discussed in this document and be agreed as part of consultations between the Petroleum Titleholder and DoT.

6.7 Incident Control Centre and Forward Operating Base

In the event that DoT is required to establish an IMT, it will be located at DoT offices in Fremantle.

In the instance that the Petroleum Titleholder has established an IMT to control a response to a Level 1 incident in State waters and this escalates to a Level 2/3 incident, arrangements would need to be made between the SMEEC and the Petroleum Titleholder to facilitate an orderly deployment of suitably qualified Petroleum Titleholder personnel, as well as the transition of appropriate information and functions, into DoT's IMT.

The same arrangements would apply to any FOB facilities established by the Petroleum Titleholder to control response operations in State waters for a Level 1 incident.

In the event of a cross jurisdictional incident where both the Petroleum Titleholder and DoT establish a FOB, the DoT FOB will exist independent of the Petroleum Titleholder FOB. However, liaison and cooperation between the two is expected to be significant and co-location may be beneficial, particularly where facilities are limited.

The ICC/FOB arrangements may be discussed as part of any consultations between the Petroleum Titleholder and DoT.

6.8 Incident Management Team Personnel

In the event that DoT is required to establish an IMT, the Petroleum Titleholder is required to make available an appropriate number of appropriately qualified persons to work within the DoT IMT.

Unless otherwise agreed during consultations between the Petroleum Titleholder and DoT, the **initial** number of Petroleum Titleholder and DoT personnel deployed to the other's respective IMT, and the role they will be expected to fulfil, is detailed in Appendix 3 and Appendix 4.

The provision of the initial cohort of Petroleum Titleholder personnel to the DoT IMT will be formally requested by the SMEEC to the CMT Leader. It is an expectation that the Petroleum Titleholder's nominated CMT Liaison Officer and the Deputy Incident Controller attends the DoT Fremantle ICC as soon as possible after the formal request has been made by the SMEEC. It is an expectation that the remaining initial cohort will attend the DoT Fremantle ICC no later than 8am on the day following the request being formally made to the Petroleum Titleholder by the SMEEC.

For Petroleum Titleholder personnel designated to serve in DoT's FOB, it is expected that they arrive at the FOB no later than 24 hours from the formal request being made to the Petroleum Titleholder by the SMEEC.

It is important to note that the requirements identified in Appendix 3 and Appendix 4 are the **initial** requirements, not minimum or maximum requirements. Once the specific circumstances of the incident are known and the actual workload of the IMT determined, the DoT Incident Controller may require the deployment of additional personnel from the Petroleum Titleholder into the DoT IMT. These requirements will be communicated to the Petroleum Titleholder through the Petroleum Titleholder's nominated Deputy Incident Controller in the DoT IMT.

In the event that additional Petroleum Titleholder personnel, beyond the initial deployment, cannot be agreed or provided, the matter may be referred to the JSCC for resolution.

6.9 Operational Team Personnel

While DoT may opt to deploy members of the State Response Team and request the deployment of members from the National Response Team, it is an expectation that the Petroleum Titleholder provides an appropriate number of appropriately qualified persons, as described in their OSCP/OPEP, to perform operational duties in the field. The appropriate number of persons allocated to this task by the Petroleum Titleholder in their OSCP/OPEP should be commensurate with their level of introduced risk.

This requirement includes making available an appropriate number of operational strike teams to implement the OPEP in relation to shoreline and other response areas where DoT is the Lead IMT (refer to Appendix 2). In these instances, the Petroleum Titleholders strike teams conducting those response operations will operate under DoT control.

It also includes the provision of an appropriate number of Petroleum Titleholders wildlife assessment, collection and treatment personnel to serve under the control of the nominated Wildlife Coordinator provided by the Department of Biodiversity, Conservation and Attractions within the wider DoT IMT.

6.10 Occupational Health and Safety and Liability

Incident management and operational team personnel will be expected to respond in accordance with the Incident Action Plan approved by the appointed Incident Controller. An exception may be where personnel believe that an operation presents unacceptable risks to the health and safety of personnel. In these circumstances, personnel or their representative should seek to resolve these issues at the earliest opportunity with the Safety Officer.

All personnel working under the direction of DoT as the Controlling Agency, are insured under DoT insurance arrangements.

6.11 Response Arrangement Exercises

The HMA has a responsibility to ensure that the response arrangements contained within State Hazard Plan - MEE are exercised annually. In accordance with State Hazard Plan - MEE and the State and Australian Government offshore petroleum legislation, it is also a requirement that industry regularly test their response arrangements.

In the interest of effective resource management, DoT undertakes to coordinate at least one joint biennial exercise in partnership with willing Petroleum Titleholders operating in or adjacent to State waters. This exercise will test collective response arrangements for a Level 2/3 MOP incident impacting State waters from an offshore petroleum activity in Commonwealth or State waters.

The location, timing and format of this biennial exercise will be confirmed by the HMA in partnership with relevant Petroleum Titleholders and other key stakeholders.

Beyond this biennial exercise, DoT's involvement in exercises conducted by individual Petroleum Titleholders is dependent on the availability of DoT resources. Requests for DoT participation in exercises conducted by individual Petroleum Titleholders can be made through DoT's MEER unit.

7 Incident Notification

In accordance with the State Hazard Plan - MEE, a Petroleum Titleholder must report all actual or impending MOP incidents that are in, or may impact, State waters as soon as reasonably practicable to DoT Maritime Environmental Emergency Response (MEER) Duty Officer via the 24 hour reporting number **(08) 9480 9924**. For an actual or impending MOP incident, resulting from an offshore petroleum activity, reasonably practicable is defined by the HMA as being within two hours of becoming aware of the incident occurring.

The initial verbal notification must be followed up by an email containing a marine pollution report (POLREP), or similar, to marine.pollution@transport.wa.gov.au.

The SMEEEC is responsible for the notification of an actual or impending MOP incident in State waters to the Director General – Transport, the Minister for Transport and the State Emergency Coordinator as required.

The Office of the Minister for Transport will make the necessary notifications to the Office of the Premier and Petroleum Titleholders are requested not to contact the Office of the Premier directly to notify them of a MOP incident.

The SMEEEC will also notify senior officials from other WA Government Agencies represented on DoT's Operational Area Support Group. This includes notification to the Department of Biodiversity, Conservation and Attractions as a precursor to a possible activation of the State Oiled Wildlife Response Plan if required.

Further notification requirements may be imposed on the Petroleum Titleholder by relevant regulatory agencies.

MOP incident notification procedures are shown in Appendix 5.

8 Investigations

During an incident, DoT and the Department of Water and Environmental Regulation will conduct a joint investigation into possible breaches of State legislation. DMIRS and NOPSEMA may also wish to conduct their own investigation into possible breaches of their legislation. Movement of investigators within the spill area will be coordinated by the DoT FOB to facilitate personnel safety.

9 Cost recovery

Cost recovery arrangements for offshore MOP incidents originating in Commonwealth Waters that impact WA State Waters are in accordance with the National Plan and the 'polluter pays' principle established under Section 572 of the OPGGSA. For offshore petroleum related MOP incidents in State Waters, cost recovery is in accordance with Section 97 of the *Petroleum (Submerged Lands) Act 1982* (P(SL)A), Section 91 of the *Petroleum and Geothermal Energy Resources Act 1967* (PGERA) and Section 37 of the *Petroleum Pipelines Act 1969* (PPA) (WA State Petroleum Acts).

In addition to the above arrangements, DoT has statutory powers in State waters to recover all costs and expenses incurred in relation to discharges or probable discharges in accordance with the Western Australian *Pollution of Waters by Oil and Noxious Substances Act 1987*.

The OPGGSA (Section 572F) requires a Petroleum Titleholder to reimburse the State, or any agency acting on behalf of the relevant jurisdiction, for any reasonable costs or expenses incurred for cleaning up, remediating or environmental monitoring resulting from the escape of petroleum to the environment. The recoverable costs or expenses are a debt due to the relevant jurisdiction/agency by the Petroleum Titleholder and are recoverable in a court of competent jurisdiction.

The WA State Petroleum Acts require a petroleum operator to maintain insurance against expenses or liability. This includes expenses of complying with directions with respect to the clean-up or other remedying of the effects of the escape of petroleum (Section 97A of P(SL)A, Section 91A of PGERA and Section 37A of PPA). Directions are issued under Section 101 of the P(SL)A, Section 95 and Section 101 of the PGERA, and Section 41 of the PPA. Section 102 of the P(SL)A, Section 96 of the PGERA and Section 42 of the PPA provides for the Minister to complete the work where a Direction has not been complied with, and for the costs and expenses incurred doing these works to be recovered via a court of competent jurisdiction.

To facilitate cost recovery, DoT will document all costs and expenses incurred by DoT. The placement of Petroleum Titleholder personnel into the DoT IMT structure in accordance with Section 6.8 will enable the Petroleum Titleholder to have input and visibility on the allocation of resources and response expenditure. However, Petroleum Titleholder approval for expenditure decisions is not required by DoT during an incident response.

10 Consultation Requirements

It is a requirement of the relevant State petroleum regulations that the EP, as prepared for the petroleum activity, must include appropriate consultation with relevant authorities and other relevant interested persons. Additionally, DMIRS assessment of State offshore OSCP's are undertaken in consultation with DoT who provide advice during the environmental assessment process.

It is also a requirement of the relevant Australian Government petroleum regulations that titleholders carry out appropriate consultation with relevant persons in the case of preparing an EP for assessment by NOPSEMA. A relevant person could include any person whose functions, interests or activities may be affected by either the oil pollution or the associated response activities. Given DoT's functions under the State Hazard Plan - MEE, DoT considers itself a relevant person.

10.1 Consultation Criteria

DoT requires consultation with Petroleum Titleholders for activities that have the potential to cause a MOP incident in State waters as defined in the State Hazard Plan - MEE.

10.2 Scope of Consultations

DoT places a high importance on consultations with the offshore petroleum industry and views this process as an important part of maximising the State's preparedness to adequately respond to a MOP incident in State waters.

In particular, consultations enable DoT to gain an understanding of the level of risk introduced to State waters by the proposed offshore petroleum activity and agree appropriate incident management arrangements and response measures where DoT is identified as the Controlling Agency.

DoT is not a regulatory agency in respect to the offshore petroleum industry with responsibility for accepting or approving an EP. Consequently, DoT will not be seeking to duplicate the regulatory process. However, any deficiencies identified by DoT will be brought to the attention of the Petroleum Titleholder and, if necessary, the relevant regulatory agency.

10.3 Format for Consultation

The format of consultation will be determined at an initial consultation meeting with the Petroleum Titleholder and is expected to include:

- Meetings to keep DoT apprised of offshore petroleum industry activity.
- Participation in MOP response exercises and/or workshops.

DoT requires that it is consulted as early as practicable during the development of an EP. DoT prefers a strategic approach to consultation to reduce the burden on DoT and the Petroleum Titleholder.

10.4 Information Requirements for Consultations

As part of the consultation process with DoT, the Petroleum Titleholder is to provide the consultation information as outlined in Appendix 6.

Petroleum titleholders may review this Guidance Note and the State Hazard Plan - MEE in order to:

- Obtain information on WA emergency management arrangements in respect to a MOP incident, including response roles and responsibilities, response notification protocols and access to government owned equipment and resources.
- Ensure that the proposed OSCP/OPEP are consistent with the National System for Oil Pollution Preparedness and Response, of which the State Hazard Plan - MEE forms part.
- Obtain information on protocols when DoT assumes the role of Controlling Agency.

DoT may provide clarification on its expectations as HMA on:

- Appropriate response techniques and protection priorities in State waters.
- Adequacy of Petroleum Titleholder resources for response activities in State waters.

10.5 Consultation Outcomes

At the completion of the consultation, the following outcomes will be provided:

- Petroleum Titleholders will be able to demonstrate that they have consulted with DoT and thus met legislated consultation requirements for preparing an EP.
- DoT will maintain an updated awareness of the State's oil spill risk and response capability.
- Clarity around the roles and responsibilities of the Petroleum Titleholder and DoT during a MOP incident will be outlined to ensure consistency with the National Plan and State Hazard Plan - MEE.

10.6 Ongoing Consultation Required

Where consultation criteria are satisfied (Section 10.1) DoT requires the MEER unit be provided with an electronic copy of the approved/accepted OSCP/OPEP prior to the relevant offshore petroleum activity commencing.

DoT requires timely notification to the MEER unit of a new or increased environmental risk and/or changes in response arrangements in an approved/accepted OSCP/OPEP that has the potential to impact State waters.

11 Document Review

This Guidance Note will be reviewed biennially, or earlier if required.

12 Additional Information

Australian Government:

- AMSA National Plan for Maritime Environmental Emergencies. Available at <https://www.amsa.gov.au/environment/maritime-environmental-emergencies/national-plan/>
- NOPSEMA IP1488 - Oil pollution risk management - Rev 1 - (February 2017) and GN1344 - Environment Plan Content Requirements - Rev 3 - (April 2016). Available at <http://www.nopsema.gov.au/environmental-management/environmental-resources/>
- Offshore Petroleum Incident Coordination Framework Prepared by Australian Government Department of Industry and Science (January 2015). Available from <https://www.industry.gov.au/data-and-publications/offshore-petroleum-incident-coordination-framework>

WA State Government:

- The Western Australian *Emergency Management Act 2005* and the Western Australian Emergency Management Regulations 2006. Available at: <http://www.slp.wa.gov.au/index.html>

Western Australian State Hazard Plan for Maritime Environmental Emergencies. Available at <https://www.transport.wa.gov.au/imate/marine/state-hazard-plan.asp>

DoT Dispersant Use Consent Framework. Available at <https://www.transport.wa.gov.au/imate/oil-spill-response-and-planning-tools.asp>

- DMIRS (previously Department of Mines and Petroleum) Guideline for the Development of Petroleum and Geothermal Environment Plans in Western Australia (November 2016). Available at: <http://www.dmp.wa.gov.au/Documents/Environment/ENV-PEB-177.pdf>
- Western Australian Oiled Wildlife Response Plans available at <https://www.dpaw.wa.gov.au/management/marine/marine-wildlife/marine-wildlife-response>

13 General Enquiries

All enquires relating to MOP incident management arrangements in Western Australia should be made to:

Maritime Environmental Emergency Response Unit
Maritime | Department of Transport
Fremantle, Western Australia
marine.pollution@transport.wa.gov.au

Appendix 1 – Incident Control Transfer Checklist (State Waters)

<input type="checkbox"/> Confirm date and time of formal transfer of Incident Control in State waters.
<input type="checkbox"/> Confirm respective Incident Controller lines of communication arrangements (including exchange of Liaison Officers in IMT).
<input type="checkbox"/> Confirm respective Division/ On-Scene Commander lines of communication arrangements (including exchange of Liaison Officers in FOB).
<input type="checkbox"/> Confirm the location of any Petroleum Titleholders FOB and Staging Areas.
<input type="checkbox"/> Confirm the details of all current response operations being conducted by Petroleum Titleholders in State waters.
<input type="checkbox"/> Confirm the composition and status of all response resources, both personnel and equipment, currently being controlled by the Petroleum Titleholders that relate to response operations in State waters.
<input type="checkbox"/> Confirm the composition and status of all response resources, both personnel and equipment, that has been mobilised by the Petroleum Titleholders and in transit to the spill site that will contribute to future response operations in State Waters.
<input type="checkbox"/> Confirm the composition and status of all response resources, both personnel and equipment that is in the process of being mobilised by the Petroleum Titleholders to contribute to future response operations in State waters.
<input type="checkbox"/> Confirm current level of incident and the predicted level in the future.
<input type="checkbox"/> Confirm existence and adherence to an OPEP/OSCP and secure a copy of the relevant OPEP/OSCP, EP and OSMP.
<input type="checkbox"/> Secure a copy of the current Situation Report and incident prognosis.
<input type="checkbox"/> Secure a copy of the Product Material Safety Data Sheet (MSDS).
<input type="checkbox"/> Notification of significant Safety Risks.
<input type="checkbox"/> Secure a copy of the latest spill trajectory modelling.

<input type="checkbox"/> Secure a copy of the latest actual spill monitoring and surveillance information.
<input type="checkbox"/> Confirm GIS lines of communication arrangements
<input type="checkbox"/> Secure a copy of the current IAP as it relates to State waters response operations, specifically the details of all immediate and future response operations planned by the Petroleum Titleholders in State waters.
<input type="checkbox"/> Secure a copy of the most recent media statements.
<input type="checkbox"/> Secure a summary of all community / stakeholder engagement activities undertaken to date and those planned in the immediate future that pertain to state waters impact.
<input type="checkbox"/> Confirm deployment of initial Petroleum Titleholders personnel to DoT IMT and DoT FOB.
<input type="checkbox"/> Reconfirm date and time of formal transfer of Incident Control in State waters
DoT Incident Controller _____ Date _____ Time _____

Appendix 2 – IMT Functions and ‘Lead IMT’ Designations

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Incident Control	Commonwealth waters	State waters	
Incident Control Centre	Perth	Fremantle	LO required in each other's IMT.
Forward Operating Base	Determined by Operations	Determined by Operations	LO required in each other's FOB.
Operations – Source Control	Lead IMT		
Operations – Aviation	Lead IMT		Including air tasks within State limits requested by DoT's IMT.
Operations – Marine (Non-Shoreline)	Lead IMT		Those marine operations that occur both in Commonwealth and State waters that are not directly associated with Shoreline operations.
Operations – Marine (Shoreline)		Lead IMT	Those marine operations that are directly associated with Shoreline operations.
Operations – Shoreline		Lead IMT	Including shoreline assessments.
Operations – Wildlife		Lead IMT	Including wildlife in Commonwealth Waters.
Operations – Waste Management	Separate	Separate	Focused on own operational areas of responsibility. <u>DoT's IMT will perform this function utilising the PT's pre-arranged waste management contract.</u>

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Intelligence – Situation & Analysis	Separate	Separate	Largely focused on own needs, however every effort will be made to maintain a common situational awareness across both IMTs.
Intelligence – Environment	Separate	Separate	<p>Focused on provision of environmental support related to own lead operational areas of responsibility.</p> <p>ESC function to reside in DoT's MEECC with provision of advice to both IMTs as required.</p> <p>Close cooperation and coordination required between both IMTs in relation to environmental support.</p>
Intelligence – Environmental Monitoring	Lead IMT		For both Commonwealth and State limits with data to be shared with DoT's IMT as required.
Intelligence – Technical Advice	Separate	Separate	Largely focused on own needs.
Intelligence – Modelling and Predictions	Lead IMT		Used to create single operating picture to be shared with DoT IMT.
Intelligence – Mapping	Separate	Separate	Largely focused on own needs, however every effort will be made to maintain consistent mapping across both IMTs.

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Planning - Plans	Separate	Separate	<p>Focused on generating IAP and relevant Sub Plans related to own lead operational areas of responsibility.</p> <p>CMT Commander and State Marine Pollution Coordinator, through the JSCC, to reach agreement on a single set of key strategic objectives, response priorities and protection priorities as they relate to the MOP component of the overall incident.</p> <p>This effort will rely heavily on planning undertaken by the PT as part of the EP approval processes.</p>
Planning - Resourcing	Separate	Separate	Focused on identifying resource requirements related to own lead operational areas of responsibility.
Planning – Communications Planning	Separate	Separate	<p>Focused on planning own communications requirements related to own lead operational areas of responsibility.</p> <p>Being mindful of facilitating effective communications between respective responders as appropriate.</p>
Planning – Management Support	Separate	Separate	Largely focused on own needs.

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Public Information – Information and Warnings		Lead IMT	Input from PT's IMT, but release coordinated by DoT's IMT.
Public Information – Media	Separate	Separate	<p>Both the PT and DoT reserve right to put out independent media statements or conduct media conferences without the other being present.</p> <p>Strong preference is for joint media statements and joint media conferences with content approved by both PT and DoT through the JSCC.</p> <p>SMEEC is the nominated State's Spokesperson.</p>
Public Information – Community Liaison		Lead IMT	<p>Both the PT and DoT reserve right to conduct independent community engagement.</p> <p>Strong preference is for joint community engagement activities with content approved by both PT and DoT through the JSCC.</p>

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Public Information – Contact Centre		Lead IMT	<p>Matters pertaining solely to the PT's IMT to be referred to the PT's IMT.</p> <p>Strong preference is for a single incident Contact Centre for the MOP component.</p> <p>PT may establish their own Contact Centre to respond to non-MOP related calls.</p>
Logistics – Supply	Separate	Separate	<p>Focused on meeting the requirements related to own lead operational areas of responsibility.</p> <p>Refer to Note below.</p>
Logistics – Communications Support	Separate	Separate	<p>Focused on meeting own communications requirements related to own lead operational areas of responsibility.</p> <p>Being mindful of facilitating effective communications between respective responders as appropriate.</p> <p>Refer to Note below.</p>
Logistics - Facilities	Separate	Separate	<p>Focused on meeting the requirements related to own lead operational areas of responsibility.</p> <p>Some facilities maybe shared through mutual agreement.</p> <p>Refer to Note below.</p>

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Logistics – Medical Support	Separate	Separate	Lead IMT must provide for medical support (and relevant sub-plan where appropriate) for all personnel working under their control. Refer to Note below.
Logistics - Catering	Separate	Separate	Focused on meeting the requirements related to own lead operational areas of responsibility. Refer to Note below.
Logistics – Ground Support	Separate	Separate	Focused on meeting the requirements related to own lead operational areas of responsibility. Refer to Note below.
Finance - Accounts	Separate	Separate	Focused on meeting the requirements related to own lead operational areas of responsibility. Noting the polluter pays principal will require DoT's IMT to apply disciplined accounting procedures.
Finance – Financial Monitoring	Separate	Separate	Focused on meeting the requirements related to own lead operational areas of responsibility. Noting the polluter pays principal will require DoT's IMT to closely monitor and record expenditure.

Key Activity	Petroleum Titleholders (PT) IMT	DoT IMT	Comment
Finance – Time Keeping	Separate	Separate	<p>Focused on meeting the requirements related to own lead operational areas of responsibility.</p> <p>DoT are responsible for the time keeping for all response personnel working under DoT control.</p> <p>Noting the polluter pays principal will require DoT's IMT to apply disciplined time keeping procedures.</p>
Safety	Separate	Separate	Responsible for responders under control of IMT.

Note

Upon establishment of incident control by DoT, the Petroleum Titleholder is expected to continue to provide planning and resources in accordance with their OSCP/OPEP. This will include response assets and contracts specified in their OSCP/OPEP, such as those pertaining to waste management, transport and personnel as well as their response arrangements with the Australian Marine Oil Spill Centre (AMOSC) and other third party responders.

Appendix 3 – Initial DoT IMT Personnel Requirements upon Petroleum Titleholder (PT)

Area	Role	Key duties	Number
DoT MEECC	CMT Liaison Officer	<ul style="list-style-type: none"> • Provide a direct liaison between the CMT and the MEECC. • Facilitate effective communications and coordination between the CMT Leader and SMEEC. • Offer advice to SMEEC on matters pertaining to PT crisis management policies and procedures. 	1
DoT IMT Incident Control	Deputy Incident Controller	<ul style="list-style-type: none"> • Provide a direct liaison between the PT IMT and DoT IMT. • Facilitate effective communications and coordination between the PT IC and the DoT IC. • Offer advice to the DoT IC on matters pertaining to PT incident response policies and procedures. • Offer advice to the Safety Coordinator on matters pertaining to PT safety policies and procedures, particularly as they relate to PT employees or contractors operating under the control of the DoT IMT. 	1
DoT IMT Intelligence	Deputy Intelligence Officer	<ul style="list-style-type: none"> • As part of the Intelligence Team, assist the Intelligence Officer in the performance of their duties in relation to situation and awareness. • Facilitate the provision of relevant modelling and predications from the PT IMT. • Assist in the interpretation of modelling and predictions originating from the PT IMT. • Facilitate the provision of relevant situation and awareness information originating from the DoT IMT to the PT IMT. • Facilitate the provision of relevant mapping from the PT IMT. • Assist in the interpretation of mapping originating from the PT IMT. • Facilitate the provision of relevant mapping originating from the DoT IMT to the PT IMT. 	1

Area	Role	Key duties	Number
DoT IMT Intelligence – Environment	Environment Support Officer	<ul style="list-style-type: none"> • As part of the Intelligence Team, assist the Environment Coordinator in the performance of their duties in relation to the provision of environmental support into the planning process. • Assist in the interpretation of the PT OPEP and relevant TRP plans. • Facilitate in requesting, obtaining and interpreting environmental monitoring data originating from the PT IMT. • Facilitate the provision of relevant environmental information and advice originating from the DoT IMT to the PT IMT. 	1
DOT IMT Planning – Plans/ Resources	Deputy Planning Officer	<ul style="list-style-type: none"> • As part of the Planning Team, assist the Planning Officer in the performance of their duties in relation to the interpretation of existing response plans and the development of incident action plans and related sub plans. • Facilitate the provision of relevant IAP and sub plans from the PT IMT. • Assist in the interpretation of the PT OPEP from the PT. • Assist in the interpretation of the PT IAP and sub plans from the PT IMT. • Facilitate the provision of relevant IAP and sub plans originating from the DoT IMT to the PT IMT. • Assist in the interpretation of the PT existing resource plans. • Facilitate the provision of relevant components of the resource sub plan originating from the DoT IMT to the PT IMT. <p>(Note this individual must have intimate knowledge of the relevant PT OPEP and planning processes)</p>	1

Area	Role	Key duties	Number
DoT IMT Public Information – Media/Community Engagement	Deputy Public Information Officer	<ul style="list-style-type: none"> • As part of the Public Information Team, provide a direct liaison between the PT Media team and DoT IMT Media team. • Facilitate effective communications and coordination between the PT and DoT media teams. • Assist in the release of joint media statements and conduct of joint media briefings. • Assist in the release of joint information and warnings through the DoT Information & Warnings team. • Offer advice to the DoT Media Coordinator on matters pertaining to PT media policies and procedures. • Facilitate effective communications and coordination between the PT and DoT Community Liaison teams. • Assist in the conduct of joint community briefings and events. • Offer advice to the DoT Community Liaison Coordinator on matters pertaining to the PT community liaison policies and procedures. • Facilitate the effective transfer of relevant information obtained through the Contact Centre to the PT IMT. 	1
DoT IMT Logistics	Deputy Logistics Officer	<ul style="list-style-type: none"> • As part of the Logistics Team, assist the Logistics Officer in the performance of their duties in relation to the provision of supplies to sustain the response effort. • Facilitate the acquisition of appropriate supplies through the PTs existing OSRL, AMOSC and private contract arrangements. • Collect Request Forms from DoT to action via PT IMT. <p>(Note this individual must have intimate knowledge of the relevant PT logistics processes and contracts)</p>	1

Area	Role	Key duties	Number
DoT IMT Finance – Accounts/ Financial Monitoring/	Deputy Finance Officer	<ul style="list-style-type: none"> As part of the Finance Team, assist the Finance Officer in the performance of their duties in relation to the setting up and payment of accounts for those services acquired through the PTs existing OSRL, AMOSC and private contract arrangements. Facilitate the communication of financial monitoring information to the PT to allow them to track the overall cost of the response. Assist the Finance Officer in the tracking of financial commitments through the response, including the supply contracts commissioned directly by DoT and to be charged back to the PT. 	1
DoT IMT Operations	Deputy Operations Officer	<ul style="list-style-type: none"> As part of the Operations Team, assist the Operations Officer in the performance of their duties in relation to the implementation and management of operational activities undertaken to resolve an incident. Facilitate effective communications and coordination between the PT Operations Section and the DoT Operations Section. Offer advice to the DoT Operations Officer on matters pertaining to PT incident response procedures and requirements. Identify efficiencies and assist to resolve potential conflicts around resource allocation and simultaneous operations of PT and DoT response efforts. 	1
DoT IMT Operations – Waste Management	Deputy Waste Management Coordinator	<ul style="list-style-type: none"> As part of the Operations Team, assist the Waste Management Coordinator in the performance of their duties in relation to the provision of the management and disposal of waste collected in State waters. Facilitate the disposal of waste through the PT's existing private contract arrangements related to waste management and in line with legislative and regulatory requirements. Collects Waste Collection Request Forms from DoT to action via PT IMT. 	1

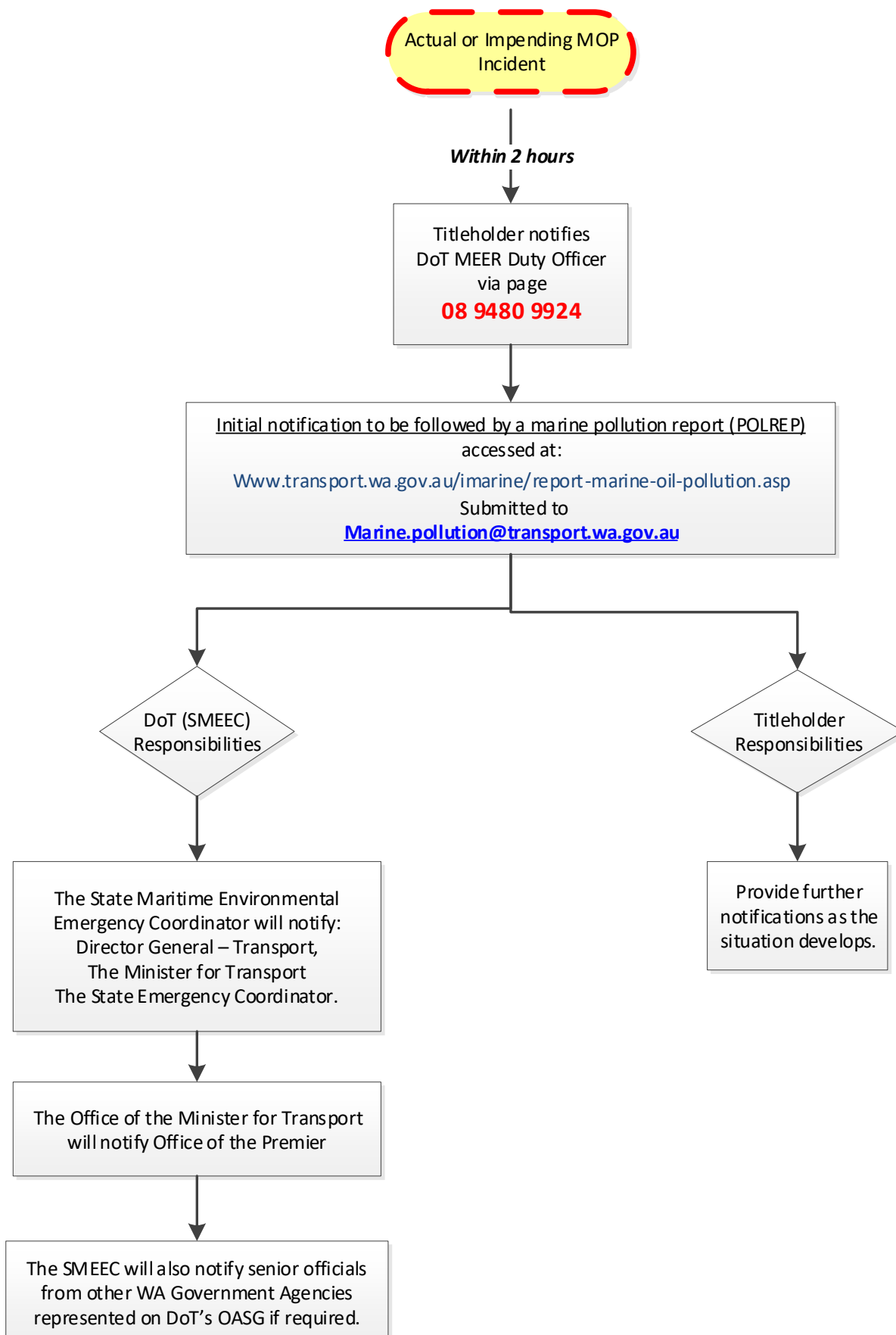
Area	Role	Key duties	Number
DoT FOB Operations Command	Deputy Division Commander	<ul style="list-style-type: none"> As part of the Field Operations Team, assist the Division Commander in the performance of their duties in relation to the oversight and coordination of field operational activities undertaken in line with the IMT Operations Section's direction. Provide a direct liaison between the PT FOB and DoT FOB. Facilitate effective communications and coordination between the PT Division Commander and the DoT Division Commander. Offer advice to the DoT Division Commander on matters pertaining to PT incident response policies and procedures. Assist the Safety Coordinator deployed in the FOB in the performance of their duties, particularly as they relate to PT employees or contractors. Offer advice to the Safety Coordinator deployed in the FOB on matters pertaining to PT safety policies and procedures. 	1
		TOTAL PT PERSONNEL INITIALLY REQUIRED IN DOT IMT	11

Note: Personnel provided by the PT to serve in the DoT IMT/FOB are not necessarily required to be a direct employee of the PT. For example, they could be an AMOSC Core Group member. However, they must be able to perform the required function and key duties.

Appendix 4 – Initial Petroleum Titleholder (PT) CMT/IMT Personnel Requirements upon DoT

Area	Role	Key duties	Number
PT CMT/IMT	DoT Liaison Officer (prior to DoT assuming Controlling Agency) / Deputy Incident Controller – State waters (after DoT assumes Controlling Agency)	<ul style="list-style-type: none"> Facilitate effective communications between DoT's SMEEC / Incident Controller and the Petroleum Titleholder's appointed CMT Leader / Incident Controller. Provide enhanced situational awareness to DoT of the incident and the potential impact on State waters. Assist in the provision of support from DoT to the Petroleum Titleholder. Facilitate the provision technical advice from DoT to the Petroleum Titleholder Incident Controller as required. 	1
PT IMT Public Information – Media	Media Liaison Officer	<ul style="list-style-type: none"> Provide a direct liaison between the PT Media team and DoT IMT Media team. Facilitate effective communications and coordination between the PT and DoT media teams. Assist in the release of joint media statements and conduct of joint media briefings. Assist in the release of joint information and warnings through the DoT Information & Warnings team. Offer advice to the PT Media Coordinator on matters pertaining to DoT and wider Government media policies and procedures. 	1
		TOTAL DOT PERSONNEL INITIALLY REQUIRED IN PT CMT/IMT	2

Appendix 5 – MOP Incident Notification Flowchart



Appendix 6 – Department of Transport Consultation

Through the Emergency Management Regulations 2006, DoT as the Hazard Management Agency (HMA) for Marine Oil Pollution (MOP) has overall responsibility for ensuring there is an adequate response to a MOP incident in State waters.

To ensure the HMA can fulfil its obligations it is critical that Petroleum Titleholders provide the DoT with relevant information and that agreement between the HMA and the Petroleum Titleholder can be reached in relation to oil spill contingency arrangements. As part of this responsibility, DoT continually updates its awareness of oil spill risk and response capability.

DoT is not a regulatory agency and does not accept or approve documents or duplicate the function of DMIRS or NOPSEMA. However, DoT will work with the Petroleum Titleholder and provide input to the oil spill contingency planning process to ensure that oil spill response capability is commensurate with the level of introduced risk.

For review, Petroleum Titleholders should provide DoT with a highlighted copy of the OSCP/OPEP as prepared for submission to the regulatory agencies. Accompanying this should be a table listing out the sections where the specific information, as detailed below, is covered in the OSCP/OPEP. The specific information as requested is as follows:

1. Description of activity, including the intended schedule, location (including coordinates), distance to nearest landfall and map.
2. Worst case spill volumes.
3. Known or indicative oil type/properties.
4. Amenability of oil to dispersants and window of opportunity for dispersant efficacy.
5. Description of existing environment and protection priorities.
6. Details of the environmental risk assessment related to marine oil pollution - describe the process and key outcomes around risk identification, risk analysis, risk evaluation and risk treatment. For further information see the Oil Pollution Risk Management Information Paper (NOPSEMA 2017).
7. Outcomes of oil spill trajectory modelling, including predicted times to enter State waters and contact shorelines.
8. Details on initial response actions and key activation and mobilisation timeframes.
9. Potential Petroleum Titleholder Incident Control Centre requirements, facilities and locations.
10. Potential Petroleum Titleholder Staging Areas / Forward Operating Base requirements, facilities and locations.
11. Details on response strategies.
12. Details and diagrams on proposed Petroleum Titleholder and DoT IMT structures and interactions including integration of DoT arrangements as per this Guidance Note.

13. Details on exercise and testing arrangements of OPEP/OSCP.

All documents submitted to DoT should display the relevant document control information to avoid any revision confusion. DoT may request further information if sufficient detail is not provided or adequately highlighted.

Petroleum Titleholders may also choose to provide the EP, or any other supporting information such as Tactical Response Plans, with any submissions.

Petroleum Titleholders are reminded to provide the DoT MEER unit with an electronic copy of the approved/accepted OSCP/OPEP prior to the commencement of the offshore petroleum activity.

In addition to the above provision of information requirements, DoT may request petroleum activity specific information for incorporation into regional risk assessments.

All consultation is to be directed to the marine.pollution@transport.wa.gov.au email address. Petroleum Titleholders are advised that there is a six (6) week timeframe on responses for consultation.