

Environmental Response Program

Management Action Plan to Respond to Audit Recommendations

The following chart shows recommendations from the 2010 CESD Audit of *Oil Spills from Ships* recommendations. Recommendations from the audit have been grouped under similar themes (governance, risk assessments, etc) with the corresponding official management action plan response. Next, actions taken to date are listed, followed by outstanding actions required to achieve the planned response. This document will be continually updated to reflect concrete actions that have been taken to advance audit recommendations.

Recommendation	Management Action Plan Response (target date)	Action Taken	Action Outstanding
GOVERNANCE/STRENGTHING NATIONAL DIRECTION			
1.41 The CCG and EC should update their national emergency management plans and review and update their regional emergency management plans as necessary.	<p><i>PUBLISHED RESPONSE</i> - The CCG is currently developing its National Environmental Response Strategy. This strategy will be supplemented by the development of a national response policy and associated plans for directing CCG efforts including those related to a major incident.</p> <p>The CCG will establish a period review process to ensure its national and regional emergency management plans remain accurate and relevant.</p>	<ul style="list-style-type: none">• The Marine Spills National Contingency Plan* has been updated to reflect changes in legislative and administrative changes that have occurred. Document also includes a cyclical review process to ensure it remains up-to-date (April, 2011).• An evergreen ER Strategy has been developed to lay out an action plan to re-invigorate the Program, which builds on a number of audit and review recommendations. Presented to MEB in March 2011. Presentation to MB in June 2011. <p>*Note: The National ER Strategy, as originally envisioned in the DFO Audit MAP, has been split into two documents – The National Marine Spills Contingency Plan, and the ER Strategy.</p>	<ul style="list-style-type: none">• The National ER Contingency Planning work group will identify other key ER program governance documents that require updating at the national, regional and area level to ensure consistency with the updated the National Marine Spills Contingency Plan (on-going).• ER program governance documents identified by the work group will be updated on a priority basis (on-going).• The work group will create a template and schedule for review for all regional and area plans to ensure that all plans are nationally consistent, contain similar information, and are reviewed and updated on a scheduled basis.

<p>1.42 To ensure that emergency management plans remains up to date, TC, CCG and EC should establish processes for reviewing their national and regional plans on a regular basis and updating them as required (for example, due to changes in legislation, roles and responsibilities, and lessons learned from significant incidents or exercises).</p>	<p><i>PUBLISHED RESPONSE</i> – The CCG will establish a periodic review process to ensure its national and regional emergency management plans remain accurate and relevant.</p>	<ul style="list-style-type: none"> • The Marine Spills National Contingency Plan* has been updated to reflect changes in legislative and administrative changes that have occurred. Document also includes a cyclical review process to ensure it remains up-to-date (April, 2011). • The Interdepartmental Sub-Committee on Planning and Logistics (DG Committee) has been established, which will review contingency plans of each department to ensure horizontal consistency. 	<p><i>Interdepartmentally</i></p> <ul style="list-style-type: none"> • The DG Committee Sub-Committee on Planning and Logistics will regularly review department’s contingency plans to ensure they are consistent and up-to-date, and consider lessons learned from exercises and events (on-going).
<p>1.72 The CCG should review the difference between the Response Management System and Incident Command System, assess whether these differences could affect a multi-party response to a major spill, and address significant differences, if any.</p>	<p><i>PUBLISHED RESPONSE</i> – The CCG will endeavour to identify the differences between RMS and ICS . This will include whether these differences could affect a multi-party response to a major spill.</p>	<p>A report has been completed reviewing the differences between RMS and ICS to assess whether it could affect a multi-agency response to a major spill (April 2011). The report concludes that RMC would likely not impede a multi-party response to a major spill, however it recommends that adjustments to the current RMS system be made to minimize confusion. Further consultation is required with internal and external partners.</p>	<ul style="list-style-type: none"> • Take a decision on an incident management system for ER that ensures interoperability with partners and develop strategy to implement decision, and fully implement new incident management system for ER (2011-13).
<p>RISK ASSESSMENTS</p>			
<p>1.32 Building on risk assessments to date, TC and CCG should conduct a risk assessment related to ship source oils spills covering Canada’s three coasts. The risk assessments should be conducted in consultations with EC and the shipping industry. TC and the CCG should put in place processes so that risks are reviewed on an ongoing basis and the risk assessment updated as required. The CCG should ensure that the risk assessment</p>	<p><i>PUBLISHED RESPONSE</i> – The CCG will work with TC to establish a framework facilitating the undertaking of risk assessment related to ship-source oil spills off Canada’s three coasts.</p>	<ul style="list-style-type: none"> • CCG and TC are working together to being scoping for an updated risk assessment of ship-sourced oil spills off Canada’s three coasts (on-going, TC lead). • Preliminary risk scoping report completed (April 2011) that is consistent with the CESD recommendation that CCG consider the risk for each role that it plays (FMO, OSC and resource agency), which necessitates consideration of risk outside the parameters of the Oil Spill Preparedness and Response Regime and risks 	<ul style="list-style-type: none"> • CCG will work with TC to complete scoping of the national risk assessment (March 31, 2012, as committed by TC). • CCG will share the results of the preliminary risk scoping exercise with TC and other partners, to aid in the scoping exercise for the national risk assessment led by TC.

considers the three roles of that it plays (ie. FMO, OSC, and resource agency)		of oil pollution from other sources, for which CCG may be required to assist as a resource agency.	
EXERCISES			
1.50 The CCG should update its program for conducting ship-source oil spill response exercises, including the type and frequency of exercises to be conducted (including the inter-regional exercises), which organizations should be involved in the exercises, and requirements for documenting exercises. It should also established procedures for ensuring that recommendations and lessons learned from these exercises are shared among regions and acted upon.	<i>PUBLISHED RESPONSE</i> – The CCG is currently reviewing its program for response exercises, including ship-source oil response exercises, and will develop a revised exercise plan.	<ul style="list-style-type: none"> The ER National Exercise Work Group has been established as part of the ER National Organizational model. One person from each region sent on the Exercise Design course to ensure regional capacity to design and conduct exercises (February 2011). 	<p>CCG</p> <ul style="list-style-type: none"> The National Exercise Plan will be reviewed and updated by the ER National Exercise Work Group, and will coordinate exercise objectives nationally, ensure after action reviews are completed, and identify areas for improvement (for example, recommend to the ER National Contingency Planning Work Group to amend the national or regional contingency plans) (on-going). <p>Interdepartmental</p> <ul style="list-style-type: none"> The Operational Response Sub-committee of the DG Committee will consider interdepartmental, national level exercises on a range of marine pollution scenarios (key partners – PS, CCG, TC, NRCan, DND, EC). Objective will be to develop a coordinated approach to significant marine pollution events (similar to the Marine Events Response Protocol for marine security events) (March 31, 2012)
Capacity Review and Preparedness			
1.57 The CCG should assess its response capacity, taking into account the capacity of the private sector, against risks related to ship-sourced spills. This information should be used by the CCG to inform	<i>PUBLISHED RESPONSE</i> - The risk assessment discussed in recommendation 1.31 will necessarily inform the CCG assessment of its response capacity is the Atlantic, Pacific, and Arctic regions taking into account the	<ul style="list-style-type: none"> <i>{As described in the published response, the results of the risk assessment will be required in order inform decisions related to the capacity of the CCG. In the meantime, nationally consistent life cycle management practices</i> 	<ul style="list-style-type: none"> Assess CCG capacity using the RO standards so that we have a common baseline understanding of current equipment capacity (2011/12);

future investment decisions.	existing response capacity of the private sector. Hence, CCG response capacity assessment will be informed by the Atlantic, Pacific and Arctic risk assessments related to ship-source oil pollution.	<i>must be put in place to have a national level understanding of current ER equipment}.</i>	
1.61 In order to ensure the readiness of the Government of Canada's operational response capacity, the CCG with input from TC, should periodically verify its preparedness to respond to ship-source oil spills (based on pre-determined procedures and criteria)	<i>PUBLISHED RESPONSE</i> – The CCG will establish a periodic review process to verify its preparedness for ship-source oil spills. The risk assessments identified and discussed in recommendation 1.31 and the response capacity assessments identified in recommendation 1.56 will necessarily inform the CCG verification of its level of preparedness for ship-source oil spills in the Atlantic, Pacific and Arctic regions.	<ul style="list-style-type: none"> <i>{As described in the published response, the results of the risk assessment and the capacity review will be required in order inform decisions related the appropriate level of preparedness for the ER Program. In the meantime, we will develop an understanding of what preparedness means for the ER program, what elements are included, and how preparedness can be quantified and routinely verified.}</i> 	<ul style="list-style-type: none"> Review to see how other departments/agencies define and quantify 'preparedness' (2011/12). This information will help inform an approach to determining readiness of the ER Program. In general, "readiness" includes components such as effective governance, effective communication structures, training, exercising, quality assurance/compliance, etc.
COMPLIANCE AND QUALITY ASSURANCE			
1.70 The CCG should implement a quality assurance program for its Marine Pollution Incident Reporting System (MPIRS). The CCG should also establish procedures so that the results of spill responses are consistently documented. The level of documentation on responses should be proportionate to the significance of the incident, and, where applicable, contain information on contributions from other entities.	<p><i>PUBLISHED RESPONSE</i> – The CCG will undertake a review to identify to required characteristics and parameters of a quality assurance program for its reporting systems for marine pollution incidents.</p> <p>The CCG will strengthen its procedures so that the results of spill responses are consistently documented.</p>	<ul style="list-style-type: none"> There is currently a national directive in place for the use of MPIRS. Non-conformity process in place that will monitor the quality of data entry into MPRIS. The existing MPRIS National Directive has been reviewed to ensure the content is up-to-date 	<ul style="list-style-type: none"> Re-training will be offered to regions by HQ to ensure that regional personnel are trained in the system (Pacific complete, other regions on-going). Review MPIRS data to identify quality assurance issues with data entry, and identify solutions to address these issues (2011/12).