Accreditation of Contractor Competence in Oil Spill Response

by

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Abstract

The need to provide an independent and authoritative means of competence evaluation for spill response contractors has been recognised in the UK. This has led to the establishment of competence evaluation criteria based on a comprehensive definition of the requirements of spill response. These requirements, in turn, derive from the current knowledge base on the nature of the response problem and the potential for improved response. Competence evaluation under the current Accreditation Scheme is now based on these evaluation criteria, and the procedure and manner of their implementation within the UK are described in this paper. This UK Accreditation Scheme is directed and operated by the Accreditation Executive Group through its Accreditation Scheme Administrator. The Executive Group approves the evaluation criteria and their application and is responsible for attainment of the Scheme's overall objective of raising spill response competence to the benefit of all interested parties. Its composition reflects those interests and is described in the paper. The details of scheme implementation are also described in terms of scheme/contractor documentation and procedures for customer feed-back. The three levels of accreditation are specified within the Categories of inland and freshwater response, seawater and shoreline response, and industrially contaminated land remediation. Candidates are assessed for competence in the conduct of specific response roles against the defined evaluation criteria which cover all the technical, managerial and compliance requirements appropriate to the Level and Category cited in the candidate's application.

Introduction

This paper describes how the UK's knowledge base on spill response was built up through Central Government funding of an R&D programme which was fully integrated with spill response operations from its inception; how this led to a transformation of national spill response arrangements; how the capacity for physical response gradually passed from the government to the private sector; how a central government regulator set up the initial version of the national accreditation scheme in conjunction with the private sector through the British Oil Spill Control Association (BOSCA); and how the current Accreditation Scheme came into being.

The paper then identifies the related functions of the current Scheme which are to recover the previously acquired knowledge base and to disseminate it through the process of accreditation in order to achieve enhanced response performance. Dissemination of the recovered knowledge base is achieved by deriving the evaluation criteria of the

Accreditation Scheme from what the base contributes to our definition of spill response requirements and to our expectations for their enhanced satisfaction. The recovered knowledge base will subsequently be maintained by its re-iterated use in periodic re-accreditations. In this way, the knowledge base, from now on, will progressively increase the professionalism and cost-effectiveness of accredited contractors and the confidence which customers can place in them to the benefit of all interested parties.

The paper provides an outline of our definition of spill response requirements; describes how these have been derived from the knowledge base and used to generate criteria for the evaluation of competence; and outlines the way in which the current Accreditation Scheme is conducted within the UK and the means by which it could be made available internationally.

The paper also indicates how the current Accreditation Scheme deals with liability issues.

Creation of the Knowledge Base

The UK Government built up a very substantial and perhaps unique knowledge base on spill response, right from the beginning. Through its Warren Spring Laboratory (WSL) within the Department of Trade and Industry (DTI), it had been involved even before the *Torry Canyon* Incident in 1967. At this early stage efforts had been directed towards improvement in shipboard oil-water separator performance to reduce operational oil discharge from ships, and towards development of dispersants for the removal of any such stranded oil from shorelines. The notion that operational discharges were the whole problem was, however, dispelled by the *Torrey Canyon* experience, which showed that casualty-related oil releases would need an entirely different order of response

Consequently, a new Division was established at WSL to investigate the problem and to develop appropriate in-house means of response at sea and on shorelines. It was also required to disseminate its results to the private sector, to evaluate techniques and equipment available from that sector and to provide fully informed personnel to assist Central and Local Government staff at all subsequent incidents. To facilitate the conduct of the sea-going element of this programme, the Division was provided with an appropriately equipped, fully dedicated ship *R.V. Seaspring* and with approval from the appropriate authorities to discharge oil and oil-in-water emulsions to sea and shore for research purposes.

The approach adopted throughout was to investigate the nature of the response problem and to evaluate the performance of all existing and developmental response equipment and techniques, which had the potential to be used at sea, as a function of weather conditions; or which had the potential for shoreline use as a function of the full range of shoreline-types, and in all cases as a function of the full range of potential pollutant viscosities. Actual laboratory work was directed entirely towards supporting that real-world approach to performance evaluation with respect to both oil and chemicals.

By 1978, it had become clear that full advantage could be taken of the results of the WSL R&D programme, only if, Central Government up-graded its managerial response provisions. Thus, in 1979, the Marine Pollution Control Unit (MPCU) was set up within the Marine Division of the DTI to take responsibility for spill response at sea and to provide assistance to Local Government in its shoreline response role.

The Head of WSL Oil Pollution Division (OPD) was transferred to the MPCU to assist with the operational introduction of the response techniques previously developed at WSL for use at sea, to establish stockpiles of the commercially available equipment previously evaluated at WSL for shoreline use in support of Local Government, to ensure that, in the new context, the WSL R&D staff would continue to supply the technical-scientific support which they had previously provided to both Central and Local Government in response operations, and to consider what might be done for chemical spillage response. Action on this last topic was to be based on the chemical work also carried out by the OPD at WSL into procedures and arrangements for discharge or retention of tank washings in support of the development of the MARPOL, Annex II; and on WSL work on chemical spillage impacts and responses according to its classification of chemicals as floaters, evaporators, dispersers-dissolvers and sinkers.

These WSL-inspired initiatives resulted in a contract being let to a private sector company to supply dispersant airborne dispersant spraying and remote sensing services to the MPCU, as specified on the basis of WSL R&D results; in arrangements being made to construct single- ship oil recovery systems, according to WSL specifications, to be operated on-board *Seaspring* and/or on coastal tankers by WSL staff; in the establishment of a stockpile of emergency cargo transfer equipment for oil and chemicals, to be maintained and air-delivered by the Ministry of Defence for use by salvors; and in the establishment of a stockpile of dispersant-spraying, mechanical recovery and other surface cleaning equipment for use by local authorities, with WSL staff advising and leading on all aspects of shoreline cleaning, pollutant-beach, material separation, pollutant-water separation, emulsion breaking, recycling and final disposal. In addition, WSL continued to provide the training courses for Local Government staff and others, including overseas customers, which it had initiated in 1974. On this basis, the first National Contingency Plan was drafted and put into operation.

On any objective assessment, therefore, by the mid-nineteen eighties the UK Government was well supplied with equipment, procedures and arrangements for spill response and with experienced personnel who had developed the subject, had themselves developed with it, and who were, thus, well able to conduct spill response operations using the accrued knowledge base for which they had also become the national custodians.

Involvement of the Private Sector

As offshore oil exploration and production gathered pace, however, the oil industry had also begun to develop oil spill response equipment and to consider the means for its deployment. This in turn encouraged the formation of more contract response organisations. The implementation by the MPCU of the results of the WSL programme had already increased the involvement of private sector contractors in equipment provision, equipment maintenance and operational deployment and use. This general move towards the private sector increased as the viability of the spill response knowledge base decreased through the progressive redeployment or retirement of the R&D personnel who had previously embodied that knowledge base and associated operational experience, as the R&D task was seen to move towards completion.

The task of maintaining the acquired knowledge base and associated operational experience under these conditions proved to be more difficult than expected, because there were no significant incidents in UK waters during the period of operational transfer from government to private sector personnel. Thus, as custodians of the knowledge base

became progressively fewer, even the operational experience of replacement staff could not be built up through exposure to properly testing incidents. By the time of the *Sea Empress* incident in 1996, there was hardly anyone left of direct experience of the R&D programme which led to the creation of the MPCU in the first place, and the founding-staff of MPCU itself, had all been replaced one way or another.

As private sector response contractors, equipment and materials manufacturers and consultants increased their respective roles in marine spill response, they formed the British Oil Spill Control Association (BOSCA). In the meantime, concern for the response to inland oil spills had increased and the additional opportunities thus created had given rise to an even larger number of spill response contractors for inland spills, many of whom also joined BOSCA. As a consequence, when the National Rivers Authority felt the growing need for an Accreditation Scheme to increase customer confidence in the services provided by inland spill response contractors, they asked BOSCA to operate such a scheme on their behalf.

Development of the Accreditation Scheme Concept

The initial scheme developed three levels of accreditation. Level 1 was intended for candidates seeking accreditation for response to small and simple incidents such as those involving domestic heating oils and to spills on industrial premises which were beyond the first-aid capabilities of the spiller, yet required only the low level of external equipment provision which could be met by contractors offering absorbents and vacuum tankers. Level II was intended to cover response to medium sized spills to land and to freshwater which called for a substantial range of equipment and operational staff to meet the demands posed by the full range of land type and topography, the full range of lake-shore and river bank type and the full range of waters from still to flowing. Level III was available for candidates intending to respond to the largest and most complicated incidents in the inland and freshwater category for which the highest provision of both personnel and equipment would be required.

The initial accreditation scheme emphasised the type and size of the candidate's equipment holdings, the appropriateness of his organisational structure, and the numbers of response staff available for rapid deployment and use of the equipment judged appropriate for the level of accreditation identified in the contractor's application. The Accreditation Questionnaire was completed by the candidate and assessed centrally by BOSCA assessors, advise by the BOSCA Council. The regulatory agency also assessed the candidate's level of in-house competence through a site visit by its industrial inspectorate.

During the course of the first phase of the Accreditation Scheme, the original regulator was replaced by respectively, the Environment Agency in England and Wales, the Scottish Environment Protection Agency, or the Environment and Heritage Service in Northern Ireland. In addition, the Maritime and Coastguard Agency (MCA), successor to the MPCU, came to require Level III Accreditation for compliance with its interpretation of the OPRC requirements for response to spills in ports and harbours.

Subsequently, a series of minor amendments were made to the procedural details of the Scheme. One of the most significant changes, however, was the appointment, as a result of competitive tender, of one of the authors, John Dawes, as the independent Scheme

Administrator. As a result of this change, the Administrator now made the on-sire evaluations of general competence instead of the regulator, to which task he was able to bring his own wide experience of spill response; but, the Scheme still lacked competence evaluation criteria formally derived from the knowledge base. The next significant change was that the other author, Doug Cormack, was contracted by the MCA to develop evaluation criteria on the basis of his earlier contribution to the knowledge base as Head of the OPD at WSL and as transferred Chief Scientist and Founder-member of the first MPCU team.

This appointment (J.D.) and contract (D.C.) had their origins in the realisation that so long as it was run by BOSCA, the Accreditation Scheme could never shake itself free of the impression that it was run by contractors for the benefit of contractors, that the absence of independent and objective evaluation criteria added nothing to its credibility, and that an opportunity had been missed, thus far, to recover the previously acquired knowledge base and to use it to the benefit of contractors, regulators and customers.

To rectify these deficiencies it was agreed to establish the Accreditation Executive Group (chairman D.C.). This Group consists of representatives from the three UK Environment Agencies and Maritime and Coastguard Agency acting as central government regulators and customers, with the BOSCA Director representing contractors, and with the UK Harbour Masters Association, Local Government Associations and the Federation of Petroleum Suppliers representing customers. The Group now has overall responsibility for the Accreditation Scheme, approves the criteria for competence evaluation and ensures that the Scheme meets its objective of raising spill response competence to the benefit of all interested parties in an objective and independent manner which is free of all suspicion of collusion between customers and accreditors.

The Current Oil Spill Response Accreditation Scheme

Knowledge Base Retrieval and Use

The knowledge base has been reviewed to provide a comprehensive statement of the requirements of spill response. The resulting statement has been used to compile a summarised listing of the roles which contractors may apply for accreditation to fulfil. These roles, in the form of headings and sub-headings, are as follows:

Information gathering and Assessment of Physical Impact and Nature of Required Response

- Prediction of oil spill fate in terms of rate of movement and of natural dispersion rate
- Assessment of morphology, flora and fauna of shorelines at risk
- Provision and manning of remote sensing aircraft
- Conduct of airborne reconnaissance in terms if slick location and layer thickness
- Conduct of foot patrols on shorelines for reporting stranding locations and amounts of pollutant
- Sampling and analysis for viscosity implications and likely effectiveness of dispersants

Selection of Response Options for use at Sea and in Inshore Waters

- Provision and manning of dispersant spraying aircraft
- Treatment of slicks at sea with regard to pollutant viscosity

Provision and manning of recovery vessels, booms and skimmers
Mechanical recovery from water surfaces with regard to pollutant viscosity and sea state.
Comparison of effectiveness between dispersants and mechanical recovery
Consideration of environmental advantages and disadvantages of dispersant use

Optimisation of Comparative Benefit from Operations at Sea, in Coastal Waters and on Shorelines

Assessment of influence of pollutant viscosity, sea state, wind and tidal vectors at sea
Evaluation of relative effectiveness of response in all potential operational locations
Evaluation of circumstances where natural and assisted dispersion will be more beneficial than recovery
Minimisation of waste recovery to maximise environmental impact overall

Selection of Spill Response Techniques for use Onshore

Provision of booms and skimmers
Operation of protective booming and associated recovery at appropriate locations
Provision and manning of appropriate equipment
Provision and knowledge of appropriate techniques for
- Mudflats
- Salt Marshes
- Sand Beaches
- Shingle Beaches
- Rocks, rock pools and cliffs
- Manmade structures

Operational use of selected Techniques on Specific Shoreline Types

Application of dispersants on shorelines
Physical enhancement of natural dispersion
Use of beach protection chemicals
Recovery of pollutants from shorelines
Recovery by use of absorbents
Removal of solid oils
Bioremediation
Emulsion breaking of recovered pollutants
Pollutant-water separation to ease storage problems

Processing of Recovered Pollutants and Contaminated Beach Materials

Separation of pollutants from beach materials *in situ* and after collection
Emulsion breaking after collection
Oil-water separation after emulsion breaking
Operation of stabilisation techniques for oil contaminated beach materials

Use and Recycling of Recovered Oils

Provision of stabilised beach materials for construction and land reclamation uses
Provision of recovered oils and/or oil contaminated debris for
- Road and related surface repair and maintenance
- Direct heat and power generation

Fuel oil production
Refinery feedstocks as practiced with oil from the load-on-top system

Disposal of Recovered Oils to:
- Land Farming
- Landfill

Compliance with the Regulations Governing Waste Recycling and Disposal for:
- Initial and intermediate storage
- Transportation
- Storage at premises of final processor
- Disposal

Management Abilities for:
- Internal staff engaged on contracted roles
- External staff operating at lower levels of Accreditation
- External casual support staff
- Progress monitoring arrangements
- Procedures for maximisation of cost-effectiveness of operations at sea
- Procedures for maximisation of cost-effectiveness of operations onshore
- Roles which may be delegated to the contractor by prior agreement with central and local government customers or those customers acting under regulation such as port and harbour authorities.

For all of the above main and sub-roles, we have specifications at even finer levels of detail which constitute the evaluation criteria against which the competence of any candidate to fulfil all or a selection of the above roles and sub-roles will be assessed by the Scheme Administrator and his team.

A further change is that the accreditation levels no longer relate simply to equipment holdings, numbers of staff and response times. They are now based on groups of operational roles, in all of which the candidate's competance in both technical and managerial functions are evaluated.

This Level I accreditation might now recognise the capability to collect and remove pollutants and polluted beach materials by means of absorbents, vacuum tankers, shovels and earth moving equipment; to operate pressure washers and steam-cleaners on appropriate polluted shoreline surfaces and manually to remove solid and semi-solid pollutants where appropriate; to provide and operate the associated immediate and intermediate storage arrangements; to transport all such collected materials to the sites chosen for other for treatment, recycling and final disposal; and to be able to demonstrate the appropriate levels of management, progress monitoring and cost control.

Level II Accreditation might now recognise the ability to manage shoreline protective booming, the associated mechanical recovery of boom-collected pollutants, the pumping of pollutants from collection sumps and trenches on suitable shorelines; the release of pollutants with the full range of viscosities from all types of shoreline surfaces by all available means, provision of appropriate storage and treatment arrangements for the separation of pollutants from beach materials, the breaking of emulsions and the separation of oil from water, all of which should be conducted with the objective of waste

minimisation and of *in situ* environmental protection very much in mind, and in full awareness of the need to comply with the requirements of the recycler, ultimate re-user, or final disposer. As a further example of a Level II role-combination, candidates may opt for the combination of chemical, as distinct from mechanical, means of shoreline protection and clearance.

Level III Accreditation would recognise the ability to utilise directly the aircraft remote sensing and shore-patrol reports and to fully evaluate current and future shore-related protection, cleaning and related down-stream requirements, and to respond accordingly in a self-sustained manner. They would also be capable of managing contractors accredited to Levels I and II.

In the UK the MCA has direct (as compared to *ad hoc*) contractors for all operations at sea and for the provision of assistance to Local Authorities for shoreline clearance. The direct contractors could be candidates for level II or III depending on the level of discretion allowed them by the MCA.

If required only to supply remote sensing data for interpretation by the MCA or to apply airborne dispersants as and when directed by MCA, they may not even merit Level II accreditation. Again, if required to conduct mechanical recovery operations at sea only as and when directed by MCA, a Level II Accreditation might be adequate, being similar to that for coastal protection booming and associated pollutant recovery on behalf of local government. As to the MCA direct contractor for shoreline response, it would be for MCA and Local Authority to agree on the level of discretion permitted to the contractor, whether Level II or Level III Accreditation would be appropriate.

The option exists, however, for the direct contractor for remote sensing to interpret the imagery obtained and on that basis to provide a more or less independent overall management function on behalf of the MCA and the coastal authorities, to an extent which might attract a Level IV Accreditation.

Similar considerations apply to inland spill response and to contaminated land remediation on which we are currently in discussion with the Environment Agencies. Similar considerations also apply to the special requirements for waterborne and shoreline response within the designated limits of ports and harbours, on which we are currently in discussion with the MCA and the Port and Harbour Authorities.

Mention was made earlier of the low frequency of exposure to significant marine incidents. In contrast, inland spill response contractors are in more or less constant action on much smaller spills and so are better placed to maintain their continuity of relevant experience. In addition, spills to land surfaces of varying type and topography, to the water surfaces of rivers and lakes and to river and lake shorelines, are similar to those in the marine environment which ultimately affects inlets, estuaries, and their respective shorelines. The current Accreditation Scheme will accordingly seek to accredit inland spill response contractors for competence to work both inland and on marine shorelines.

The main differences between the two locations are that deeper penetration of the pollutant to the water-table is to be expected inland than on shorelines and that in the former case, the pollutant will thus reach freshwater, whereas in the latter, it may reach

fresh or saline waters. In the former case also, there is a link to the problems of remediation of land which has been chronically polluted by previous industrial activities.

The current Accreditation Scheme will accordingly cover contractors engaged in the remediation of such contaminated land. In addition, it is our intention to extend the current Scheme to contractors engaged in chemical spill response, in a manner parallel to that adopted for oil spill clearance and contaminated land remediation.

The Questionnaire

To initiate the accreditation process, the candidate completes a standard questionnaire. In this the candidate identifies the roles being offered for consideration and the level of accreditation being sought.

The candidate is also asked to identify the number of separately manned and independently operated bases which need to be separately assessed and the number of equipment storage bases which will be included with assessment of the operating bases as appropriate. If sub-contractors are used, they need to be identified and their operational status with respect to the candidate needs to be clarified.

Candidates must provide details on location, staff categories and numbers within each category, call-out procedures and response times, and geographical areas covered and reachable within two or four hours respectively.

Candidates must describe and provide evidence of public liability insurance, licences issued under the waste regulations, certificates of quality assurance, staff qualifications, and all internal procedural guidance documentation for all response operations. They must also provide all relevant certifications such as those relating to small boat handling, use of breathing apparatus, forklift truck operation, and the training course attendances of relevant personnel.

Candidates are asked to describe the services on offer with reference to the response roles that have earlier identified, together with their arrangements for task and risk assessment, progress monitoring and cost control, for minimisation of waste arisings in their clearance operations, for pollutant storage, treatment and transportation; and for ensuring that their treatment of pollutants will meet requirements of environmental protection, re-use, recycling and final disposal as appropriate.

Candidates are asked to describe their equipment holdings in terms of type, numbers and intended use in spill clean-up, pollutant processing, transport etc., having regard to pollutant viscosity and volatility, and to health hazards in confined spaces. Candidates are also required to describe their equipment cleaning, planned maintenance and storage arrangements together with their standing arrangements for hiring and operating the full range of equipment which they would expect to need but do not hold in stock.

Candidates may provide in-house training or have recourse to external trainers. In either case they are asked to describe their objectives and use of such training; to supply numbers and types of staff who have passed through such training with dates; and to describe qualifications and relevant experience acquired by whatever other means. This data should cover all staff in operational, managerial and administrative grades.

Candidates are asked to describe their response to two incidents in the preceding two years detailing dates, response times achieved, requirement and risk assessments, equipment selections with reasons, rates of cleanup achieved as a function of oil/emulsion properties and of the physical characteristics of the polluted location, the ratio of dispersant to recovery options used; any difficulties encountered with immediate and intermediate storage, transportation, and the capabilities available to them for the disposal and recycling options. They should also provide evidence on the accuracy of their estimated costs.

Candidates are also asked to provide details of their customer liaison procedures, and contact details for four customers for whom they have worked in the previous two years so that the scheme Administrator may contact them for customer feedback. Candidates are also invited to provide copies of any unsolicited testimonials received from customers.

Finally, candidates are asked to sign a statement confirming to the best of the signatory's knowledge and belief that the information supplied in the questionnaire and supporting schedules is correct and true; and to sign the following Quality Statement: "I undertake to ensure that the spill response activities of (company name) will be fully consistent with all relevant aspects of the current knowledge base on spill response and that those activities will be carried out cost-effectively and in an environmentally friendly manner fully consistent with the professional standards required by the UK Accreditation Executive Group and the International Spill Accreditation Association..

Action following Completion of the Questionnaire

The completed questionnaire is given preliminary assessment by a competent assessor appointed by the Scheme Administrator as approved by the Executive Group. At this point the candidate may be asked to clarify or augment the information supplied.

When the questionnaire stage is completed a competent assessor, as described above, will visit the candidate's main and other bases as required to verify the information provided in the questionnaire; to complete the assessment of spill response competence by direct observation and in accordance with the evaluation criteria appropriate to the roles for which the candidate has opted in his questionnaire return; and to award the appropriate level of accreditation on the basis of that overall evaluation.

On completion of the accreditation procedure and payment of the appropriate fee, the successful candidate will be listed in the National Register of Accredited Spill Response Contractors which is circulated to the three Environment Agencies, to the MCA, Local Authorities, and to potential customers in the private sector.

Re-accreditation falls due at three-year intervals and during the intervening period the accredited contractor's performance at a real spill will be evaluated by a competent assessor, as defined above. To this end the contractor is required to notify the Scheme Administrator with 24 hours notice when the opportunity arises for such an evaluation.

Liability Considerations

The stated purpose of this Accreditation Scheme is to enhance the professionalism of oil spill response contractors. To this end, evaluation criteria have been derived from the spill response requirements and the realistic prospects for their satisfaction as indicated by reference to the current knowledge base on oil spill response. The award of an

accreditation level of competence is a measure of the candidate's compliance with those evaluation criteria. It is not a guarantee of the performance actually achieved in specific incidents or any part thereof.

The Accreditation Executive Group, however, welcomes feedback from customers through the Scheme Administrator. All negative reports thus received will be shared with the contractor reported on, and advice will be provided on the rectification of any substantiated deficiencies through the Scheme Administrator to meet the stated purpose of the Accreditation Scheme which is to enhance the professionalism of oil spill response contractors to the maximum extent possible.

All liability remains with the contractor, however, as covered by the terms of his contract with the customer in compliance with normal commercial practice.

The Customer-Contractor Relationship

The membership of the UK Accreditation Executive Group has been chosen with the intention of advancing the interests of regulators, customers and contractors. Accordingly it will be sharing the spill response knowledge base, not only with contractors to increase their response competence through the accreditation process, but also with customers to increase their understanding of the levels of service which they are entitled to expect.

The Accreditation Executive Group recognises that the extent to which it is successful in increasing the use of the knowledge base by both customers and contractors, is the extent to which the relationship between the two can be considered fully conducive to the effectiveness of spill response and thereby made to serve the environmental interests of the regulators to the maximum possible extent.

International Applicability of the UK Accreditation Scheme

The limited international awareness that the UK is re-launching its Accreditation Scheme as here described, has already produced a gratifying expression of international interest.

As a consequence, the UK Executive Group has supported the establishment of an International Spill Accreditation Association (ISAA). The aim of the ISAA is to offer contract services for the establishment and operation of overseas Accreditation Schemes, modelled on the UK experience and practice, but tailored to the specific needs of individual government agencies and related national interests.

To facilitate the transfer of our accreditation-based approach to performance enhancement to those who may welcome such transfer, the directors of ISAA suggest that other national or international agencies might form Accreditation executive Groups, similar in constitution to the UK Executive Group in representing the interests of regulators, customers and contractors.

The directors further suggest that the ISAA would then work under contract with these other Executive Groups to introduce National or Regional Schemes for the Accreditation of spill response contractors and to advise on the subsequent operation of such schemes when requested to do so.

Alternatively the directors of the ISAA suggest that they could arrange to accredit overseas oil spill contractors, directly or through their Trade Associations.

In any case, it would be the intention of the ISAA directors that all spill response contractors thus accredited would become members of the ISAA in order that continuous contact and interaction could be maintained with them and in order that they could fully benefit from the commercial advantages which such membership could entail.