

Implementing international good practice standards at a local level: Preparing for oiled wildlife response in England and Wales

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Introduction

The UK's National Contingency Plan (NCP) (MCA, 2014) for response to marine pollution identifies the RSPCA as the lead organisation for providing a wildlife response in England and Wales. In a recent review of the NCP and the Scientific, Technical and Operational (STOp) advice note for the Environment Groups (EG) (MCA, 2016) it was decided that the STOp notice regarding the EGs was not the most suitable place to provide details of the preparation and planning required for an oiled wildlife response. The RSPCA suggested that what was required was a separate STOp notice for incidents involving wildlife, including spills of oil or other pollutants, defining the response which would effectively act as an oiled wildlife management plan for England and Wales, and, potentially, the UK as a whole.

The RSPCA has drafted this STOp notice on the back of two collaborative projects between the RSPCA and a number of other oiled wildlife organisations based in Europe and further afield. The standards produced and lessons learned from these two projects, along with our previous experiences, have provide invaluable insights into the need for effective planning and preparation in oiled wildlife response, as an effective wildlife response is only possible if a strategy has been developed beforehand and agreed with stakeholders, government (both local and national), industry and NGOs.

This paper provides a summary on the progress of this plan and how it needs to dovetail with existing oil pollution preparedness plans that exist in the UK.

Background

The RSPCA has been involved in the rehabilitation of oiled wildlife since the *Torrey Canyon* disaster 51 years ago. Over this time, it has developed its procedures for rescue and rehabilitation of oiled wildlife and is recognised as a leading authority in this field. As a result, the RSPCA is named as the lead oiled wildlife responder in England and Wales in the National Contingency Plan (MCA 2014).

The RSPCA has been invited to participate in the Standing Environment Groups (SEGs) but this involvement has been patchy; we have been invited onto some local groups but not others and we have been invited by the MCA to attend the National SEG chairs meetings. However, as part of the recent review of the STOp Advice note (2/16) (MCA 2016) for the working of the EGs, it was agreed that wildlife rescue and rehabilitation should be removed from this STOp notice. The SEG Chairs felt that these issues would be better managed as operational activities, and warranted a standalone STOp note, rather than the advisory following extensive additions by NGOs such as the RSPCA, on the rescue and rehabilitation of live animals, and the RSPB on the collection of carcasses and data from dead birds to the draft STOp note.

As a result, the information relating to wildlife rescue, rehabilitation and data collection was removed from the draft STOp note on EGs but the RSPCA felt that it needed to be included somewhere. Following discussions with the MCA it was agreed that the RSPCA would develop a STOp note on wildlife response. This would cover the areas of wildlife rescue and rehabilitation, the collection of carcasses, the need for good data collection regarding affected wildlife and the need for wildlife response to be incorporated into the larger incident management structure.

Our reasoning for this was that not only would it fit with the new IOGP-IPIECA OSR-JIP guidance, stating that wildlife response should be included as one of the 15 core capabilities of the oil industry for tiered preparedness and response, it would help to better inform other agencies about how we operate so that we could work with those agencies when preparing for possible incidents. The RSPCA has been involved in a number of spills and exercises where wildlife rescue has been considered as an afterthought. The RSPCA will always respond to calls from the public, or other agencies, regarding animals in distress, but we believe that for effective oiled wildlife response, much more planning and preparation is required in order to deliver the best response, as detailed in the IPIECA guide on wildlife response preparedness (IPIECA, 2014). Furthermore, it has always been assumed that the RSPCA will provide a response, but changes in the legislation regarding oil exploration (EU, 2013), and other changes pertaining to health and safety and other areas, require us to improve our planning procedures so we can better prepare our staff for the situation they may find themselves in. Lastly, the RSPCA would like to have an agreed structure in place that recognises the RSPCA's role of wildlife rescue in the event of an oil spill so that a formal agreement can be created between the responsible party and the RSPCA in the event of an incident.

Supporting Work

The RSPCA has been a partner in two major projects aimed at oil spill response and preparedness. The first, called EUROWA, has been to develop oil spill preparedness in Europe with regards wildlife rescue. We, in collaboration with other European organisations, have developed a number of training courses and manuals to aid in the establishment of an oiled wildlife response, such as a protocol for the rescue and rehabilitation of birds (EUROWA, 2016). The training courses are aimed at developing a network of trained responders who can be deployed in their local area in the event of an incident and so provide a tier one response. They can be supported by the EUROWA module, a team of specialised individuals who can attend at short notice to provide particular expertise and deliver additional training if required.

The second project has been termed GOWRS and is another collaboration between oiled wildlife response groups, but this time from all over the world. This project has resulted in the development of animal care standards (IPIECA, 2017) and other supporting documentation that could aid a tier 3 response.

One important message that has emerged from both these projects is the need for preparedness. Although oil spills are unpredictable events, it is possible to plan for them by constructing plans and having exercises aimed at testing these plans so that all the agencies involved develop some resilience to potential incidents and can mount a proper response. With proper planning, those involved in wildlife rescue can work more efficiently so delivering benefits to both the animals affected and the responsible party.

The proposed STOp note for wildlife response is our proposed plan for major incidents where a wildlife response is required in England and Wales. The note effectively defines a wildlife management plan for an oil spill response and the actors that have parts to play in that plan. It defines the role of the SEGs in the development of the plan during 'peacetime' and the role of the response organisations, such as the RSPCA, in 'peacetime' and during a response and other agencies, such as local authorities, who would be undertaking 'recovery' under civil contingency arrangements and managing the shoreline response. It briefly outlines what is required to mount an effective response and how the wildlife response should be incorporated into the incident response, by use of the wildlife branch system used in the US. As stated in the IPIECA document *Wildlife Response preparedness: a pre-planned, professional and fully integrated wildlife response effort led by experienced oiled wildlife response managers allows for a response effort that is aligned with broader health, safety and operational objectives. In considering the potential for impacts on wildlife in advance of a potential oil spill, response options can be assessed and objectives defined. Furthermore, a unity of effort can be achieved among multiple stakeholders, ensuring that the brief window of opportunity for responding to live wildlife casualties can be used effectively and appropriately.* (IPIECA, 2014)

Finally, it needs to be recognised by all involved that wildlife response is a specialised area of work that needs specialised equipment and personnel. The danger is assuming that such personnel and facilities will always be available. The RSPCA manages four wildlife centres, all of which have facilities to rehabilitate oiled birds, but there can be competing demands on our time and facilities. For example, the increase in the grey seal population has resulted in an increase in the numbers of grey seal pups we see each autumn and winter. These pups take up many of the resources we would use for oiled birds and it is likely that, in the event of an incident, a temporary facility would need to be established and this is where good planning is essential. Planning allows us to identify potential sites for such a facility, with good access to services such as running water, electricity supplies, road infrastructure and communications. Establishing such a facility would also require funding and so any plan must also consider how such a facility would be funded and again, emphasises the need for agreements to be in place beforehand so that cost recovery measures can be agreed in advance.

Conclusion

The need to prepare for oiled wildlife response is essential for an effective response to be delivered. The STOp notice for wildlife response will outline what is needed to prepare for such a response and how different agencies can contribute. It will also demonstrate the need to improve the incident response structure so that the wildlife branch is incorporated into that main response, rather than just being seen as an additional complication.

References

- European Union (2013) Directive 2013/30/EU on safety of offshore oil and gas operations and amending Directive 2004/35/EC, annex VII
- EUROWA (2016) Animal care during an oiled wildlife response
- IPIECA (2014) Wildlife Response Preparedness
- IPIECA (2017) Key principles for the protection, care and rehabilitation of oiled wildlife

MCA (2014) The National Contingency Plan: A Strategic Overview for Responses to Marine Pollution from Shipping and Offshore Installations

MCA (2016) Maritime Pollution Response In The UK: The Environment Group: Scientific, Technical and Operational Advice Note - SToP 2/16