

(Brief)

A Human Safety Consideration

Submission

to

Hebron Public Review Commission

on

**The Rationale for the Retention
of the Maritime Rescue Sub Centre
St. John's, Newfoundland and Labrador**

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Hebron Project

(Search & Rescue Impact on Human Safety)

Background

Among the many considerations for a successful Hebron project, none can be more important than that of human safety. Connecting the dots on all the elements of safety can be far reaching in an environment that can be rewarding but nevertheless challenging and unforgiving. Protective clothing and equipment, training, education and other safety considerations will undoubtedly form the basis of a safety culture that must prevail against the backdrop of a very dynamic undertaking.

While the safety mantra of the Hebron team will be, and should be, one of prevention, accidents will nevertheless occur. Consequently, emergency preparedness becomes the focal point of all the dots in the safety constellation. Dealing with emergencies under any circumstance requires careful planning, enabling facilities and good execution. Dealing with emergencies in a marine environment that essentially defines the offshore component of the Hebron project, brings with it an entirely new set of rules and skills that must be factored into the preparedness model.

Emergency preparedness infrastructure in a marine environment has its own very unique characteristics. In large part, the Hebron project has technical and financial capacity to effect its own emergency obligations. However, circumstances and other dictates require a coordinating function that entails not only the Hebron project team but also the resources of government and the public at large. To this end, the role of a Maritime Search and Rescue Coordinating Centre becomes one of the most important operatives in the execution of an effective emergency response involving human life.

Maritime Search and Rescue in Canada

Following the adoption of the 1979 SAR Convention, The International Maritime Organization (IMO) divided the world's oceans into 13 search and rescue areas. In each of these areas the countries concerned have been delineated SAR regions for which they are responsible. In accordance with IMO and the International Civil Aviation Organization (ICAO) agreements to provide SAR services in Canada and adjacent ocean areas, the country has been divided into three SAR regions (SRRs) for maritime and aeronautical SAR co-ordination.

Joint Rescue Coordinating Centres (JRCCs) have been established within each of the three SRRs in Canada. These include Victoria, British Columbia, Trenton Ontario and Halifax Nova Scotia. Maritime Search and Rescue Sub Centres (MRSCs) have been established within the Trenton SRR and The Halifax SRR. These include Quebec City, and St. John's, Newfoundland and Labrador.

Maritime Rescue Sub Centre St. John's (Description)

The MRSC St. John's was given effect by the government of Canada in 1976 and formally established as an operational entity in 1978. Contrary to its connotations of being subordinate to a higher authority, the designation as a "sub centre" simply suggests that it is a coordination centre within a sub area of the overall SRR. The MRSC St. Johns and the MRSC Quebec are both fully autonomous centres that work collaboratively with JRCCs in Canada and internationally. Likewise, it works in a similar fashion with all its regional stakeholders, including oil industry players. The centre is staffed 24/7/365 by 2 CCG SAR Mission Coordinators.

The MRSC St. John's is a sub area located within the Halifax SRR. The area generally includes waters adjacent to coastal NL as far as the 200 mile limit in the East, Cape Chidley in the North, mid-way in the Gulf of St Lawrence and Cabot Strait. It also includes most of the major fishing grounds around the St. Pierre Bank.

Maritime Rescue Sub Centres (Rationalization)

MRSCs were established for the purpose of coordinating and overseeing responses to maritime SAR incidents within local areas. Aside from this, essential rationale was to provide local knowledge and expertise against the backdrop of language, dialect, geography, cultural habits, metrological and environmental characteristics and other variables unique to specific regions of the country.

Additional practical applications have evolved to further entrench the advantage of MRSCs. These include the following:

- Managing SAR workload within diverse and unique regions of Canada.
- Managing the command and control component of rescue coordination.
- Integrating and collaborating with maritime stakeholders within a community context.
- Customizing SAR coordination responses in keeping with regional fleet management, Canadian Coast Guard Auxiliary, private and other public resources within the local communities of respective regions.
- Customizing SAR Coordination response within a unique multi-functional regional operations centre design.
- Providing at all times, a state of readiness for forward-deployment of human and physical resources to localized areas when necessary in the event of a major marine disaster.

Maritime Rescue Sub Centre St. John's (Operating Environment)

The MRSC St. John's carries out SAR missions in a unique operating environment. Approximately 85 percent of the population resides on the Island portion of the province where all but 78 communities are located on tidal waters. The remainder of the population is scattered across the province and into the vast geography of Labrador. The mainstay of the economy is heavily weighted against a maritime activity, which consist of a modern day fishery against the backdrop of the exploitation of oil reserves located in the harsh, unforgiving North Atlantic.

The MRSC St. John's is responsible for 900,000 square nautical miles of ocean and 29,985 kilometers of coastline. The centre responds on average to 500 maritime SAR incidents a year. It has the highest rate of distress incidents of any of the rescue centres in Canada. Nearly 70 percent of all the SAR cases in NL are related to the fishing industry, which is considered one of the most dangerous occupations in the world. Over 90 percent of the Canadian small boat fishing fleet operates in waters adjacent to NL. Since the 1992 cod moratorium, more than 80 fishermen have lost their lives in the fishing industry off NL.

The MRSC St. John's also administers an ocean area that is comprised of the majority of the offshore oil industry exploration and production activity in Canada. There is significant transatlantic shipping activity in close proximity, with vessels en route to and from Europe and Eastern North American ports. There is also a major prevalence of recreation activity on a seasonal basis, in all parts of the province.

Often referred to a one of the harshest environments in the world, mariners execute their diverse trade against the odds of ice infested waters, volatile sea conditions driven by some of the worst meteorological variations known. Effective SAR incident coordination in this distinctive environment relies heavily on the Coordinators local knowledge. Experienced coordinators who have lived and sailed off the coast of NL are intimately familiar with the migratory fisheries and seasonal trends and weather patterns, recreational pursuits, the unique landscape and seascape of the areas of responsibility. As an example, it's worth noting that the NL Gazetteer offers thirteen different locations for the name of Green Island.

Maritime SAR Coordinator (Credentials)

The responsibilities of a Maritime SAR Coordinator are established under IMO protocols. Coordinators at the JRCCs and MRSCs in Canada are responsible to the Department of National Defense (DND) SRR Commander for the conduct of specific maritime SAR operations. They have a background study in Nautical Science and certification as ships officers. They are also certified SAR coordinators by DND and have specialized training in search planning. Search Mission certification and ongoing Search Master training and stringent on-the-job check-out are also required.

With their training, SAR coordinators have extensive knowledge and certification in ship construction and stability. They also have extensive seagoing experience. Coordinators have in-depth knowledge of global, national and local geography, environmental and meteorological characteristics. They are likewise familiar and always in-tune with the broad spectrum of national and local commerce and recreational boating activity within the maritime community.

Maritime SAR Coordinators (Primary Duties)

Maritime SAR Coordinators have very far-reaching legislative empowerment under the Canada Shipping Act. Within that authority they can requisition vessels (government and private) for SAR purposes related to vessels or aircraft in distress. Coordinators have legislative authority to order vessels to assist in SAR duties and appoint vessels as on-scene commanders.

Maritime SAR Coordinators are continuously making life and death decisions. They are continuously maintaining command and control of maritime distress situations, including incidents related to oil platform installations and could at any time include a major marine disaster. Multi-tasking maritime resources along with police, fire department, ground search teams, and other federal/provincial/territorial/municipal agencies is very much the norm. Developing search plans, managing communications around information and commands are all part of routine duties. Finally, while saving lives is the mantra of SAR, managing tragedies involving

fatalities is very often part of the front-line duties of Maritime SAR coordinators in Canada.

Hebron Relationship with the Maritime Rescue Sub Centre

The relationship between Hebron and the Maritime Rescue Sub centre is predicated on the common thread of emergency response in a maritime environment. In this respect, there are two main components to this very important equation. Firstly, emergency preparedness, which includes the planning, educating/training and exercise of the plan needed to conduct a smooth and efficient operation when an emergency occurs. Secondly, the execution of a well coordinated search and rescue operation in the face of uncertainty and the unique human and environmental elements that are always at play in any emergency situation at sea.

Hebron Emergency Preparedness and Role of the MRSC

As with other offshore oil industry players, Hebron will develop a safety contingency plan tailored to meet its needs in the offshore. The framework for such plans exists and oversight from agencies like the C-NLOPB will factor into the safeguard for its development and implementation.

The role of the MRSC within the Hebron contingency plan for offshore safety will be significant, both as an operational component within the plan and as a key player in exercising it. Over the years, rescue coordinators at the MRSC in St. John's have integrated themselves into the maritime community and have been able to use its expertise to assist commercial and recreational stakeholders. In this regard, the MRSC coordinators have developed and delivered a very effective Oil and Gas Seminar for offshore workers. The seminar, primarily intended to educate offshore oil industry workers at all levels, including management, has been considered a "must do" exercise.

Rescue Coordinators at the MRSC have also been integrated into the contingency plan exercises of offshore oil industry players. Developing emergency scenarios, role playing, observing and providing advice has been a reciprocal arrangement that has served to educate both SAR Coordinators and offshore oil industry workers in the process of emergency preparedness.

Hebron (Maritime Emergencies) and Rescue Coordination

The variation in types of offshore emergencies within the Hebron offshore context, are many. Emergencies involving workers within the confines of platforms are a much more controlled situation. Current oil industry protocols for dealing with these types of incidents have demonstrated excellent capacity for the various companies to respond and resolve.

Accidents involving the integrity of vessels, aircrafts and/or oil rigs and production platforms entail an entirely different response. It ostensibly would require the full scope of involvement of the SAR system, where the role of the MRSC St. John's becomes very important. Such maritime emergencies often have the potential to escalate in a major marine disaster. It can often mean mass evacuation of large numbers of personnel under very difficult circumstances. It often results in subsequent search and rescue operations where prolonged and complex searches can prevail in a large ocean area. It would invariably involve multiple air, sea and land resources, which would include company, private (vessels of opportunity) and government sources.

This kind of situation essentially serves to give definition to Search and Rescue Coordination. By its very nature, the command and control of the situation would quickly default to the SAR system and the Search Mission Coordinators on duty at the MRSC St. John's and the JRCC Halifax. Resources would be engaged, coordinated and an On-Scene-Commander appointed by the Search Mission Coordinator. Contingency plans and lessons learned during its exercise will quickly become very meaningful under this type of Search and Rescue Emergency. The engagement of highly trained SAR Coordinators who have extensive experience gained from the coordination of many incidents within its area of jurisdiction, also gives distinct advantages for successful results.

The internal procedures that take place within the SAR system during these types of operations are often seamless, efficient and transparent. Managing the full scope of command and control becomes a main operative. In most cases it would require a forward deployment of human and physical resources to the local area. Also involved in this action would be the need to establish a SAR forward operating base.

Given the distinct advantage of an already established MRSC in St. John's, forward deployment clearly becomes somewhat academic. There would already exist local coordinating operatives, which include a reciprocal exchange of offshore oil industry personnel between the MRSC and representative from the Emergency Operation Centres (EOCs) at their headquarters in St. John's. With the comfort levels of very efficient collaborations, which are measured against previous training and contingency exercises, Search and Rescue Coordination should achieve the maximum objective possible in the protection of human lives during a maritime emergency occurrence offshore.

Summary and Conclusion

The Hebron project is an ambitious undertaking with an offshore component that is infinitely operative to its overall success. Its production location puts it well out to the eastern extremities of the Grand Banks of Newfoundland and Labrador. Workers in significant numbers have to live, work, transit and sail in a maritime environment that will challenge the best laid plans in the world. Ships, production platforms, and aircrafts used in the project will have to endure and stand the test of all that the North Atlantic can throw at it. If any of these facilities fail the test, the Maritime SAR System in partnership with the Hebron team will be the final lifeline.

There is currently a very public debate regarding the announced closure of the MRSC St. John's. This action is being taken in the face of very dynamic and very diverse maritime activity, which includes the ever increasing development of mega oil and gas projects like Hebron. With the closure of MRSC St. John's, there still exist a framework for Maritime SAR Coordination out of the JRCC in Halifax.

Rationalization for the closure of the MRSC St. John's is that modern technology has deemed it redundant and obsolete. Apparently, it is assessed to be a duplication of service, which is already provided by the Marine Communications and Traffic Systems in the province. The action has been considered a cost saving measure of approximately one million dollars annually. The declaration by the minister responsible that the MRSC constitutes nothing more than a "Call Centre" may provide a clue to the

serious misunderstanding of the important role it plays in Maritime Search and Rescue.

It is very important to understand the evolution and initial rationalization of the MRSCs. It came after many maritime tragedies and subsequent inquiries into them. It was NEVER established to fill a technology or communications gap and nothing has happened since to change that reality. It was established to apply the principles of local knowledge and local expertise. Its main function is one of life and death decision making though the application of search planning and expert search and rescue coordination. Managing the command-and-control operatives that a Hebron type emergency in the offshore can entail is a perfect illustration of the potential utility of the MRSC St. John's.

It must not go unnoticed that a number of other tragedies have occurred since the establishment of the MRSC St. John's. The Ocean Ranger tragedy in 1984 with the loss of 84 workers and concurrent loss of the Russian container ship Merkanik Tarasov a few miles away with the loss of all but 5 of its crewmembers serves to illustrate lessons learned. Inquiries into these unfortunate incidents and internal SAR needs analysis of 1995 and 2005 have entrenched and validated the need for MRSCs in Canada. It must also be noted that technological advances have increased the workload and complexity of SAR coordination at the MRSC St. John's to the extent that the centre had to be elevated from a one man to a two man operation, two years ago. Modern technology has also brought an ever increasing level of communication of distress situations directly into the MRSC.

This presentation has outlined the function of the MRSC and the role of the Coordinators who staff it. Proximity to the Hebron operating theatre and other stakeholders give the advantage attributed to the MRSC St. John's legitimacy. Integration of the MRSC and its Rescue Coordinators into the safety education of workers and exercising contingencies is an advantage that will not exist under a consolidation with the JRCC Halifax. Real time reciprocal arrangements between industry EOCs and MRSC during Maritime emergencies will be eliminated. The workload alone, with just 3 Rescue Coordinators in Halifax compared to the present situation that often has many as 8 Rescue Coordinators in three centres, will jeopardize the ability of the centre to effectively carry out its mandate.

This presentation is provided from the perspective of the Maritime SAR Coordinators at the MRSC St. John's. It is the strong opinion of the Maritime SAR Coordinators, which are represented at the MRSC St. John's, that lives will be lost should the closure of the MRSC become a reality. Therefore, we call upon the Hebron Public Review Commission to consider this within the scope of its plan for the protection of human lives offshore. It is further suggested that formulating a response to the planned closure of the MRSC St. John's should be a priority in its objective to obtain the best possible protection for its offshore workers when the Hebron project get underway.