



February 8, 2022

CSI Client Advisory 04-2022

SUBJECT: Recurring Exercise Requirements

The following is an overview of all exercise regulations required for all plan-holders who possess a Federal (U.S. Coast Guard), California State, and/or Panama Canal SOPEP (PCSOPEP) response plan. If you have any of the plans listed above, you may need to conduct the following exercises for each plan when operating in US waters.

I. U.S. Federal National Preparedness for Response Exercise Program (PREP)

- Drills are regulated by the U.S. Coast Guard (USCG).
- Take note that if you have a USCG & California plan, you only need to conduct one of each of the following drills to meet both USCG & California requirements.
- Applies to tank vessels (VRP) and non-tank vessels (NTVRP).

a. Annual Table Top Exercise (TTX):

This exercise is conducted between a vessel listed in your Vessel Response Plan (VRP), your Crisis Team and the QI/Incident Management Team (IMT). This exercise **MUST** be conducted every year. This exercise is designed to test the (VRP), the ability of your office, the vessel, and the QI/SMT to meet certain pre-determined objectives. As per PREP Guidelines, *“one or more plan holder representatives must participate in each exercise.”*

For Non-tank plan-holders, this annual requirement can be obtained by conducting the exercise outlined above OR by participating in a Focus Training Seminar (FTS) held in various locations throughout world and has been available through webinars online. As a longstanding CSI client, FTS is a *new* option available to all of our clients, and is hosted by a team of very experienced trainers. FTS closely mirrors the style of training you have experienced for many years with CSI. CSI will be providing additional information in upcoming advisories, which will outline the schedule of FTS' as well as some amplifying information on how this training can be incorporated into your annual schedule to meet the requirements.

In both cases (Tanker/Non-tanker) an exercise must be conducted even if no vessels are currently trading to the U.S. We will contact you to schedule an exercise or FTS each year. However, we ask that you plan to attend as early as possible to ensure compliance.

Please note both Federal and State authorities are actively verifying compliance with the annual exercise. Failure to maintain compliance may result in deficiency and/or monetary penalty.



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b. Qualified Individual (QI) Notification Exercise:

Exercise is conducted between the vessel and the GMS Qualified Individual (QI) listed within your plan. The vessel must call the QI and conduct a notification exercise either once per quarter (four times per year) OR prior to entry into U.S. waters (suggested 72 hours prior to arrival), whichever is less frequent. When performing this exercise please contact the QI at our 24-hour telephone number (+1 (912) 233-8181) and when prompted, press 2 to conduct a drill. Upon receipt of the call, a Watch Stander will ask the following questions:

1. Vessel Name
2. IMO # and/or Call Sign
3. Next port of call and ETA

After receiving this information from the vessel, the Master must make a log book entry which includes the date/time of the exercise, and the QI who was involved. This should be readily available for USCG, California or vetting inspector (when applicable) inspection.

c. Remote Assessment & Consultation (RAC) Exercise:

1. The RAC exercise is now required once every three years, per VRP/NTVRP, plan holder. If your company has more than one plan, a RAC will need to be performed by one vessel in each of the plans once every three-year (triennial) cycle. This exercise is only required for those vessels operating within U.S. waters (EEZ). This exercise should be conducted in conjunction with the Qualified Individual Notification Exercise. Most of our clients conducted this exercise in 2020 during the TTX, so your plan is compliant and no exercise is required until 2023 (i.e. Triennial cycle – 2020 through 2023). Procedures for conducting this exercise are listed below;

2. Vessel initiates the RAC by contacting the QI (+1 (912) 233-8181, then press 2 when prompted) as per response plan procedures.

The QI will verify the following information with the vessel:

- a. Vessel Name
 - b. Vessel Call Sign & IMO number
 - c. Vessel phone number & email address
3. The QI will then contact SMFF resource provider and have them complete the RAC with the vessel.
4. SMFF Resource provider will contact the vessel to complete the exercise.
- a. Please copy QIX@chgms.com on all RAC exercise email communication.



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- b. Vessel must record the exercise in their log book or exercise log.
5. Upon completion of your vessel's RAC Exercise (when vessel returns all documents to SMFF resource provider), we will provide a Certificate of Completion that will be emailed and uploaded to the client portal. Once received, please forward this certificate to all vessels listed within the respective response plan.

d. Shore-based Salvage & Shore-based Marine Fire Fighting Exercise:

These are two separate exercises that can be combined into one exercise that must be conducted annually. This exercise may be conducted in conjunction with the annual Incident Management Team table top exercise; if so, the SMFF resource provider must participate (this can be done remotely). The SMFF resource provider may claim credit for an actual response/incident when objectives have been meant, response is evaluated, and proper records are generated. The SMFF resource provider will provide documentation for accreditation. Please contact your SMFF resource provider for further details regarding how to obtain this annual accreditation.

e. Shipboard Emergency Procedures Exercise:

Exercise is conducted between the Master and crew only. This must be conducted once per quarter (four times per year). The objective of this exercise is to conduct an exercise of emergency procedures to ensure crew knowledge of actions to be taken in an emergency situation. A complete list of scenarios can be found in your vessel response plan along with a checklist to assist in meeting this requirement.

Upon completion of this exercise, the vessel must make a log book entry which includes the date/time of the exercise, and the type of exercise (e.g. *Shipboard Emergency Procedures Exercise*). This drill can be conducted in conjunction with other exercises (i.e. SOPEP).

II. California State Exercise Requirements

- State of California Department of Fish & Wildlife regulate exercises
 - Applies to tank vessels (CA Contingency Plan) & Non-Tank vessels (CA NT Plan)
 - Completing California State exercises enables the plan-holder to satisfy Federal exercises (previously addressed) & vice versa. Therefore, you do not have to do these exercises twice.
- a. Spill Management Team Table Top Exercise (TTX):**

Exercise is similar to the Federal Incident Management Team Table Top Exercise. Please note that California requires in invitation, in advance of: 60 days for in-State exercises, 45 days for out of state, and 30 days for out of country. Only 1 exercise per calendar year is required for each plan. A single annual exercise will satisfy both the



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California and U.S. Coast Guard required exercise. An exercise must be conducted even if no vessels are currently trading to CA.

b. Qualified Individual (QI) notification exercise:

See description under Section I of this advisory

c. Shipboard Emergency Procedures Exercise:

See description under Section I of this advisory. However, please note that non-tank vessels bunkering in California must, at least one time per year, perform a deck spill scenario wherein they simulate using and inventory the seven-barrel spill kit.

III. Panama Canal SOPEP

- Regulated by the Panama Canal Authority (ACP)
- Applies to toll-paying vessels with a 400+ MT carrying capacity of oil as cargo or fuel

a. Authorized Person (AP) Notification Exercise

Exercise is conducted between the vessel and the Authorized Person (Panama version of the QI). Exercise must be conducted twice per year and be documented by both the vessel and the AP. Exercise is similar to U.S. QI exercise and California QI exercise. AP will ask various questions to the vessel. This exercise must be conducted even if the vessel has no plan to transit the Panama Canal.

This Client Advisory, along with previously issued CSI Client Advisories, can be retrieved from our website, www.compliancesystemsinc.com. If you are unable to download any of this information, please let us know and we will email it to you. Should you have any further questions, please do not hesitate to contact us here at CSI.