**SPR Measure of Compliance – Physical Review**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Business Leader and/or Country Chair Accountability**  Target DateClick or tap to enter a date. | | | | |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Are there documented criteria for notification of an incident to the country crisis team? | SPR Man Req 3 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Does the government have, maintain and exercise a documented National Contingency Plan (NCP) and spill preparedness and response laws? | SPR Man Req 5 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. If yes, (the NCP is mature and well established) is there regular engagement with the agency or authority responsible for implementation of the NCP to discuss ratification of industry best practices such as the IPIECA IMS? | SPR Man Req 5 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Is there a regulatory process for approval for the use of dispersants i.e. NCP? If not, has a request been made to authorities and documented? | SPR Man Req 5 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Is there a regulatory process for approval of in-situ burning listed in the NCP? If not, has a request been made to authorities and documented? | SPR Man Req 5 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. If no (the NCP is not mature or well established), is the Country Chair actively encouraging the Country to ratify and implement spill preparedness and response laws? | SPR Man Req 6 | All Tiers | Yes  No  N/A  Not Reviewed |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Manager Responsibilities**  Target DateClick or tap to enter a date. | | | | |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Has an Emergency Response Coordinator been appointed to prepare, maintain and exercise spill plans? | SPR Man Req 10 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Is the Spill Response Plan (SRP) based on scenarios up to and including a worst case spill, and is there documentation to support the analysis? | SPR Man Req 10 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Have primary and back up Incident Commanders been appointed to manage the response in the event of a spill? | SPR Man Req 11 | All Tiers | Yes  No  N/A  Not Reviewed |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Establish and Maintain Spill Response Plan**  Target DateClick or tap to enter a date. | | | | |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Does the notification process within the SRP include notification of a potential Tier 3 spill or any spill to water from maritime operations within 4 hours – notification in all cases must be by call to + 1 - 713 - 241 – 2532 within the Americas, or to + 44 - 207 - 934 – 7777 outside the Americas? | SPR Spec Req 1 (bullet 1, 9 & 10) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are Tiered spill response resource requirements (equipment and people that match the response tactics and strategies) identified and documented, including considerations for spills in Ice where applicable? | SPR Spec Req 1 (bullet 2 & 10) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are Incident Emergency Response Centres identified, referenced within SRP or ERP, and are capable of being equipped with multiple lines of communication, adequate space for participating personnel, and security and logistical support services to sustain the response organisation for a prolonged period? | SPR Spec Req 1 (bullet 2) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** | |
| 1. Does the IMS include a duty roster for primary positions for a tier 3 response? i.e. IC, PIO, LNO, SOFR, OSC, PSC, LSC, FSC, SITL, RESL, EUL, and is it referenced in the SRP? | SPR Spec Req 1 (bullet 2) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Have initial response actions been identified in the SRP? | SPR Spec Req 1 (bullet 3) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Is a process described in the SRP for assessing the incident and protecting responders and the public from spill hazards? e.g. Air Monitoring, PPE, establishing exclusion zones. | SPR Spec Req 1 (bullet 3) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Are communication systems available for notification and mobilisation of the IMT 24 hours a day (i.e. Shell Notification System, local paging system, etc.) and referenced in the SRP? | SPR Spec Req 1 (bullet 3) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Does the Incident Management System align to the Shell Incident Management System (or ICS /IPIECA IMS equivalent for NOVs)? | SPR Spec Req 1 (bullet 4) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Where the local government is not using ICS or IPIECA IMS have the roles and interfaces been mapped within the SRP? | SPR Spec Req 1 (bullet 4) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Are processes in place to report oiled wildlife and activate response organisations and are they referenced in the SRP? | SPR Spec Req 1 (bullet 4) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Have IMS roles & responsibilities been clearly defined and documented for each functional position identified in the IMS organisation? | SPR Spec Req 1 (bullet 5) | All Tiers | Yes  No  N/A  Not Reviewed |  | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Are there security procedures in place for assessing the incident and protecting responders and the public and are they referenced in the SRP? | SPR Spec Req 1 (bullet 5) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Have high risk/sensitive locations, based upon spill scenario, been identified, mapped and/or modelled, and referenced in the SRP? | SPR Spec Req 1 (bullet 6) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. If modelled, was it consistent with the Spill Modelling Guidance document in chemical/oil spill planning for a worst-case spill and is it referenced in the SRP? Dissimilar products that constitute different responses should be modelled. | SPR Spec Req 1 (bullet 6) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. For sites with Tier 3 spill risk have maps of sensitive areas, (e.g. ESI Maps), been undertaken and is it referenced in the SRP. Have sensitive areas been prioritised and appropriate response strategies (plans for protection) developed. | SPR Spec Req 1 (bullet 6) | Tier 3 sites only | Yes  No  N/A  Not Reviewed |  |
| 1. If the facility handles bulk chemicals, does the SRP reference the OSEC Chemical Spill Response Tool for the Marine Environment or with OSEC approval incorporate and keep current all the applicable content from the tool? | SPR Spec Req 1 (bullet 6) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Do the response strategies and tactics align with the Chemical Spill Response Tool for the Marine Environment? | SPR Spec Req 1 (bullet 6) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are external Spill Response Organisations, Contractors, and Mutual Aid partners identified in the SRP? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Has a waste management process (collection, storage, transportation, reprocessing, disposal, identification and activation of contractors) been developed and aligned with local legislation and is this referenced in the SRP? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Is the process for obtaining approval from the authorities for the waste management process referenced in the SRP? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Is there a process in place within the SRP to activate aerial resources in support of a response? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are local and or regional Spill Response Organisations, referenced in SRP, trained and is this documented as per the ‘Tier 2 OSRO Assurance guidance’? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are contract holders for Spill Response Organisations executing their duties in relation to the Contractor Management System? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are arrangements to ensure activation and availability of spill response resources in place with external agencies (including Mutual Aid partners) for local and regional response resources to support the following:   Land transport operations - including movement of materials and people to and from an incident. Contracted where possible and as a minimum contact detail identified in the plan. | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| Vessel operations - Where a business does not have Vessels on permanent charter, or are available via the spill response provider, vessels of opportunity can be identified and called upon when required. The lead time for the vessels should be noted. | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| Air monitoring services - contracted where possible and as a minimum contact details identified in the plan. | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Are response times and/or the locations of Tier 2 spill response resources referenced in the SRP? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Where no government certification/approval of local/regional Spill Response Organisations exists, has an assessment been completed to determine readiness of the organisation as per the ‘Tier 2 OSRO Assurance guidance’? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Where dispersants are identified as a spill response strategy, is a directory of available dispersant types and volumes held locally and regionally and referenced in the SRP? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. If applicable, is the directory of well source control resources (e.g., capping, subsea dispersants) held locally and regionally and referenced in the SRP or the Well Source Control / Containment Plan? | SPR Spec Req 1 (bullet 7) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are applicable and related plans (NCP, Stakeholder, Local, Company, etc.) referenced in the SRP? | SPR Spec Req 1 (bullet 8) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Where required, does the SRP align with government statutory requirements? | SPR Spec Req 1 (bullet 8) | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Has the process for obtaining government customs clearance for spill response equipment been identified and referenced in the SRP? | SPR Spec Req 1 (bullet 9 & 10) | Tier 3 | Yes  No  N/A  Not Reviewed |  |
| 1. Has the process for obtaining government immigration clearance for spill response personnel been identified and referenced in the SRP? | SPR Spec Req 1 (bullet 9 & 10) | Tier 3 | Yes  No  N/A  Not Reviewed |  |
| 1. Have the freight forwarding companies that are required to store and handle Tier 3 spill response resources been referenced in the SRP? | SPR Spec Req 1 (bullet 9 & 10) | Tier 3 | Yes  No  N/A  Not Reviewed |  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | | **Comments / Actions** |
| 1. Does the SRP document the process for activating spill response resources; including the process to activate international resources and responders outside of their assigned area, e.g. GRSN? | SPR Spec Req 1 (bullet 10) | Tier 3 | Yes  No  N/A  Not Reviewed | |  |
| 1. Are agency and stakeholder phone numbers including statutory notification contacts documented in the SRP? | SPR Spec Req 1 (bullet 11) | All Tiers | Yes  No  N/A  Not Reviewed | |  |
| 1. Are the contact details for the Incident Management Team, Emergency Response Team, ERC/Emergency Manager and back-ups, emergency contacts (contractors / mutual aid groups) current, and referenced in the SRP? | SPR Spec Req 1 (bullet 11) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Are draft press release/holding statement templates available? | SPR Spec Req 1 (bullet 11) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Are procedures in place and responsibilities assigned for communications with local communities referenced in the SRP? | SPR Spec Req 1 (bullet 11) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Are integrated communication systems and equipment defined for all response activities (in-field and command posts) and are these referenced in the SRP? | SPR Spec Req 1 (bullet 11) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Have claims processes and organisations been identified, and referenced in the SRP? | SPR Spec Req 1 (bullet 12) | All Tiers | Yes  No  N/A  Not Reviewed |  | |
| 1. Is the SRP checked annually for accuracy, and reviewed and updated every three years (e.g., worst case spill, legislative requirements, Tier 2 spill response organizations)? | ERM Spec 1.3 | All Tiers | Yes  No  N/A  Not Reviewed |  | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Communicate Spill Response Plans**  Target DateClick or tap to enter a date. | | | | |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Is the SRP current and registered in a document management system? | SPR Spec Req 2 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are SRP updates documented, including a dated revision log reflecting the changes? | SPR Spec Req 2 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are changes to spill response plans and supporting documents communicated to plan holders and relevant internal and external parties (e.g., management of change process)? | SPR Spec Req 2 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Where required, does the SRP distribution list include designated response providers and relevant government agencies or authorities? | SPR Spec Req 2 | All Tiers | Yes  No  N/A  Not Reviewed |  |

| **Exercise and Test Spill Response Plans**  Target DateClick or tap to enter a date. | | | | |
| --- | --- | --- | --- | --- |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Is there a multi-year plan that effectively tests the spill response scenarios that are identified in the risk register that aligns with the control framework for each applicable Tier? | SPR Man Req 10 & SPR Spec Req 3 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Is there a plan to host a country/multi country Tier 3 exercise? | SPR Spec Req 3 | Tier 3 | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 1 notification exercise been undertaken and documented within the last 6 months? | SPR Spec Req 3 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 1 Table top exercise been undertaken and documented within the last 12 months? | SPR Spec Req 3 | All Tiers | Yes  No  N/A  Not Reviewed |  |

| **Questions** | | **HSSE CF Reference** | | **Tier Applicability** | | **Compliance** | **Comments / Actions** |
| --- | --- | --- | --- | --- | --- | --- | --- |
| 1. Has a Tier 1 equipment deployment been undertaken and documented within the last 12 months? | | SPR Spec Req 3 | | All Tiers | | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 2 notification exercise been undertaken and documented within the last 12 months? | | SPR Spec Req 3 | | All Tiers | | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 2 Table top exercise been undertaken and documented within the last 24 months which includes participation from government or external (e.g. contract or mutual aid) response providers? | | SPR Spec Req 3 | | All Tiers | | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 2 equipment deployment been undertaken and documented within the last 24 months? | | SPR Spec Req 3 | | All Tiers | | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 3 notification exercise been undertaken and documented within the last 12 months? | | SPR Spec Req 3 | | Tier 3 | | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 3 Table top exercise been undertaken and documented within the last 36 months which includes participation from government or external (e.g. contract or mutual aid) response providers? | | SPR Spec Req 3 | | Tier 3 | | Yes  No  N/A  Not Reviewed |  |
| 1. Has a Tier 3 country/multi country exercise been undertaken and documented within the last 36 months? If not, have the business Core GRSN members attended a Tier 3 country/multi country (Regional) exercise as per the 2-year attendance requirement? | | SPR Spec Req 3 | | Tier 3 | | Yes  No  N/A  Not Reviewed |  |
| 1. Has the communication plan been exercised during Tier 2 & 3 exercises? e.g. media templates and information packages and internal communications | | SPR Spec Req 3 | | All Tiers | | Yes  No  N/A  Not Reviewed |  |
| 1. Has the process for obtaining government customs clearance for spill response equipment been incorporated within Tier 3 exercises and documented? | | SPR Spec Req 3 | | Tier 3 | | Yes  No  N/A  Not Reviewed |  |
| **Questions** | **HSSE CF Reference** | | **Tier Applicability** | | **Compliance** | | **Comments / Actions** | |
| 1. Has the process for obtaining government immigration clearance for GRSN / spill response personnel been incorporated within Tier 3 exercises and documented? | SPR Spec Req 3 | | Tier 3 | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Have the freight forwarding companies that are required to store and handle Tier 3 spill response resources been incorporated within Tier 3 exercises and documented? | SPR Spec Req 3 | | Tier 3 | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Have the contact methods for the Incident Management Team duty personnel been tested and documented? | SPR Spec Req 3 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are Tier 3 exercises based on documented objectives that test key SRP components? | SPR Spec Req 3.1 | | Tier 3 | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are notification exercises recorded and any corrective actions assigned to the relevant parties? | SPR Spec Req 3.1 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are learnings from table top exercises recorded with the corrective actions assigned to the relevant parties? | SPR Spec Req 3.1 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are learnings from equipment deployment exercises recorded with the corrective actions assigned to the relevant parties? | SPR Spec Req 3.1 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are learnings from actual spills recorded with the corrective actions assigned to the relevant parties? | SPR Spec Req 3.1 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are learnings from exercises, incidents, OSEC/SEM, and other business LFIs considered when updating the plan? | SPR Spec Req 3.1 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are corrective actions monitored and verified as closed out through a l tracking process e.g. Fountain or RADAR? | SPR Spec Req 3.2 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |
| 1. Are learnings from exercises and incidents incorporated in future exercises? | SPR Spec Req 3.2 | | All Tiers | | Yes  No  N/A  Not Reviewed | |  | |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Training and Competency**  Target DateClick or tap to enter a date. | | | | |
| **Questions** | **HSSE CF Reference** | **Tier Applicability** | **Compliance** | **Comments / Actions** |
| 1. Are IMT staff identified and trained in Media relations? | ERM spec 8.2 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Do the site competency requirements include spill response training? | ERM spec Req 8.2 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Are training requirements identified and documented? | ERM Spec 8.2 | All Tiers | Yes  No  N/A  Not Reviewed |  |
| 1. Do training records demonstrate compliance with country requirements? | ERM Spec 8.2 | All Tiers | Yes  No  N/A  Not Reviewed |  |