



Oil Spill Contingency Plan



Acknowledgement of Country

Flinders Port Holdings acknowledges the Traditional Owners of the land and waterways on which we operate, and pays respect to Elders past, present and emerging.

Disclaimer

The information in this document is correct at the time of printing. For the latest version please visit <http://www.flindersports.com.au>. Whilst every attempt has been made by FPH to include regulatory obligations and guidance relevant to the scope of stakeholder activities, FPH advises independent legal and specialist technical advice is sought by port users when addressing their specific operational risks and opportunities at FPH's ports.

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Acronyms and abbreviations

AIIMS	Australasian Inter-Service Incident Management System
AFAC	Australasian Fire and Emergency Service Authorities Council
AMOSC	Australian Marine Oil Spill Centre (AMOS Plan Section III 2021)
AMSA	Australian Maritime Safety Authority
CFS	Country Fire Service
Control Agency	Agency or Company assigned by legislation or within the relevant contingency plan, to control response activities to a maritime environmental emergency
Designated Port Waters	Those waters as indicated at Appendix A of this Plan, for the Flinders Ports managed ports of Port Adelaide, Klein Point, Port Giles, Port Lincoln, Port Pirie, Thevenard and Wallaroo.
DEW	Department of Environment and Water
DIT	Department of Infrastructure and Transport
EMA	Emergency Management Australia
EPA	Environmental Protection Agency
ESC	Environmental Scientific Coordinator
SERP	Flinders Ports - Site Emergency Response Plans
HFO	Heavy Fuel Oil
IBC	Intermediate Bulk Container (capacity 1000 litres)
IC	Incident Controller
ICC	Incident Control Centre
IFO	Intermediate Fuel Oil
IMT	Incident Management Team
MFS	Metropolitan Fire Service
NATPLAN	National Plan for Maritime Environmental Emergencies
NEBA	Net Environmental Benefit Analysis
NOPSEMA	National Offshore Petroleum Safety & Environmental Management Authority
OSCP	Oil Spill Contingency Plan
OSRA	Oil Spill Response Atlas
OSTM	Oil Spill Trajectory Model
POA	Port Operating Agreement
SA	South Australia
SAMSCAP	South Australian Marine Spill Contingency Action Plan
SDS	Safety Data Sheet
SEMP	State Emergency Management Plan 2022 v2
SC	State Controller
TSB	Towable Storage Bladder

01 Context

The National Plan for Maritime Emergencies (NATPLAN) identifies three levels of marine oil spill incidents and defines a Level 1, 2 and 3 spill, the responsible agency and incident escalation triggers.

The South Australian Marine Spill Contingency Action Plan (SAMSCAP) describes the responsibilities and arrangement between Commonwealth, state and industry (port managers) when managing a marine oil spill.

The Flinders port Holdings (FPH) Oil Spill Contingency Plan (OSCP) outlines the arrangement for FPH in responding to a Level 1 marine oil spill incident as Port Manager and a first-strike responder, refer to Table 1 for detailed information on the authority and responsibility, the definition of each type of spill and the corresponding emergency management plans to be read in conjunction with this OSCP. This OSCP should be read in conjunction with FPH Site Emergency Response Plans (SERPs) for each port.

02 Purpose

The purpose of this plan is to:

- Describe how FPH will meet its responsibilities as the Manager of a Port by integrating with the SAMSCAP (and other plans as necessary), in preparing for and responding to a Level 1 marine oil spill incident in FPH Ports Waters, as a first-strike responder and provide an interface with DIT for request and coordination of assistance, when required
- Describe the procedures to be followed, response priorities and strategies required to minimise impact on the natural, commercial and socio-economic sensitivities of the impacted area
- Detail how FPH facilities, first response equipment and trained first responders have the capacity and capability to manage a Level 1 spill and
- Establish how FPH will document the response actions, the local response resources, the generic sensitivities at risk, and the reporting procedures, consistent with the identified risks.

03 Arrangements and Integration

3.1 Plan Integration

The NATPLAN and SAMSCAP outlines the coordinated arrangements in place for government and non-government organisations when supporting the Control Agency during an incident.

The SAMSCAP requires FPH to develop an oil spill contingency plan as Port Manager. FPH responsibility is to be the Response Agency and therefore be prepared to respond to a Level 1 incident in a 'first-strike' capacity (refer to Table 2). The FPH OSCP and Site Emergency Response Plans (SERPs) are noted by the Department of Infrastructure and Transport (DIT).

The procedures and support mechanism under the SAMSCAP may be initiated to provide additional assistance, not available locally, when a marine pollution incident exceeds the capacity of the port to effectively contain and/or clean up the spill. Other plans, including the SA Response Plan for Oiled Wildlife, may be enacted in the event of an oil spill. The Flinders Ports OSCP will integrate with those plans, as depicted in figure 1 and in sections below:

Figure 1: National, State and Industry marine spill plans and corresponding emergency arrangements

Marine spill arrangements		Emergency arrangements	
Australian Maritime Safety Authority	• National Plan for Maritime Environmental Emergencies	National Emergency Management Agency	• The Australian Emergency Management Arrangements
SA Department of Infrastructure and Transport (Control Agency)	• South Australian Marine Spill Contingency Action Plan	SA Department of Premier and Cabinet (State Emergency Management Committee)	• State Emergency Management Plan • SA Country and SA Metropolitan Fire Service are Control Agency for hazardous materials
Flinders Port Holdings (Port Manager and Port Response team)	• FPH Oil Spill Contingency Plan	Flinders Port Holdings	• Site Emergency Response Plans (multiple Ports)

3.2 Plan Activation

The Authority to activate this OSCP will come from the designated Incident Controller for each port, or the General Manager Flinders Ports. The OSCP will be activated when a confirmed oil spill of a Level 1 scope (as defined by the NATPLAN), is required to be responded to by Flinders Ports, within its designated Port waters. The OSCP may also be activated in larger spills in Port, State or Commonwealth waters, at the initiation of the State Controller or AMSA Incident Controller.

04 Scope

4.1 Geographical area of operations

This OSCP applies to all Level 1 marine oil spills that occur in, or are present in, the designated port waters of Port Adelaide, Klein Point, Port Giles, Port Lincoln, Port Pirie, Thevenard and Wallaroo. This includes the shorelines adjacent to these waters, if impacted by a marine oil spill from within port waters. Plans of the Ports, indicating the areas of these designated port waters, are attached Appendix A and in the SERPs for each port.

4.2 Incident Control Centre Locations

The location of the specific ports Incident Control Centre (ICC) are listed at Appendix B of this plan, and in the SERPs for each port. The Flinders Ports Crisis Management Control Centre is located at Flinders Ports Marine Operations Centre, GATE C, Berth 2, Level 1 Passenger Terminal, Outer Harbor, Port Adelaide, South Australia.

4.3 Equipment storage locations

The Australian Marine Oil Spill Centre (AMOSC) owns oil spill response equipment and manages a trained team of personnel. For these resources to be made available, the State Controller will make a request through the appropriate AMSA representative. The State and National Plan response equipment is stored at FPH ports in Port Adelaide, Port Lincoln, Port Pirie, Wallaroo and Thevenard. Current storage location of all equipment can be accessed by departmental staff via AMSA's National Equipment Database within the National Environmental Maritime Operations (NEMO) application.

In addition to the State and National equipment, FPH are required to have sufficient response equipment to deal with a Level 1 incident. FPH stores additional equipment at key locations:

- Port Adelaide M Berth has marine oil spill booms
- Port Adelaide Outer Harbour 1-4 (MOC) store marine oil spill booms in the wharf container and spill trailer (including v-sweep booms and a skimmer)
- All Ports have spill kits located in appropriate locations to deal with different spill risks (marine, chemical, oil and fuel, biowaste etc).

South Australian Fire Services have possession of an amount of specialised equipment for the response to hazardous and noxious substance spill incidents and other emergency situations. Specially trained personnel are available to operate the equipment and/or provide advice to the Control Agency on the most effective response strategy.



4.4 Stakeholders

Table 1 contains a list of potential stakeholders and their function, who may be involved with a marine oil spill in port waters. It is not a definitive list. Refer to Appendix C for Stakeholder and Flinders Ports personnel contact list.

Table 1: Potential stakeholders involved when the OSCP is enacted

POTENTIAL STAKEHOLDERS WHEN OSCP IS ENACTED	
STAKEHOLDER	FUNCTION
Australian Maritime Safety Authority (AMSA)	- Manages the NATPLAN. - Combat Agency for spills in Commonwealth waters.
Australian Marine Oil Spill Centre (AMOSC)	Provides personnel, equipment & training to Oil Industry participants.
Dept. of Infrastructure & Transport (DIT)	- South Australian government department responsible for marine pollution response. - State Controller Agency (SAMSCAP). Liaison with AMSA.
Dept. of Environment and Water (DEW)	- Statutory Authority for protection of wildlife. - Control Agency for oiled wildlife response
Environment Protection Authority SA (EPA)	- Review compliance with facilities licences. - Provide Environmental Scientific Coordinator. - Coordinates OSRA. 24/7 pollution incident hotline.
Department of State Development (DSD)	Statutory Authority for spills from offshore exploration and production activities in State waters.
SA Police	- Emergency management issues. - Public order and security.
Port Authorities	Flinders Ports is the Incident Controller of a Level 1 incident originating in Flinders Ports designated port waters.
Local Councils	Provision of assistance in a spill incident – equipment & personnel for shoreline response.
Industry Oil companies	Trained spill response equipment/personnel available for immediate response from their facility.

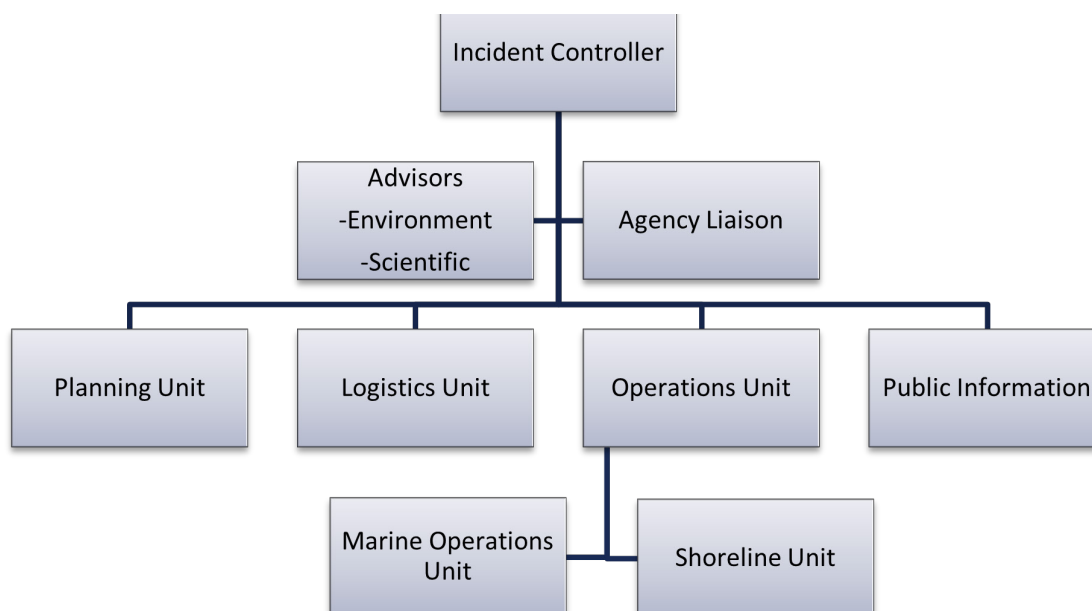
05 Preparedness

The management of a Level 1 incident will utilise the following guiding principles.

5.1 Incident control structure

The NATPLAN three levels of spill incidents ensure the management system can be adapted to meet the demand of the incident, supported by the Australasian Inter-Service Incident Management System (AIIMS). This OSCP incident control structure is based on an adapted AIIMS that enables the flexibility required for a first-strike response for FPH in responding to a Level 1 incident. With a level 1 oil spill incident, the Incident Management Team (IMT) will typically follow the structure in Figure 2. The scale and complexity of the response, and the number of resources required to respond, will determine what positions are to be filled in the structure.

Figure 2 Potential Incident Control Team



5.2 Incident management team

The IMT will consist of an Incident Controller, for all incidents the Incident Controller will be the General Manager Flinders Ports or the Manager Port Operations. This may be delegated to the Regional Port Manager on as needs basis.

Regional Port Managers will respond to incidents at Klein Point, Port Giles, Port Lincoln, Port Pirie, Thevenard and Wallaroo as the initial Incident Controller.

The General Manager Flinders Ports may assume the role of Incident Controller at any stage of the incident, with notification to the Regional Port Managers and the Manager Port Operations.

Upon clarification of an oil spill incident that requires a response by Flinders Ports, the Incident Controller will implement an IMT, commensurate with the size, complexity, actual & potential sensitivity impacts, potential duration of the response, and the resource requirements.

The functions within the IMT, will be filled by personnel locally at the ports, and by Flinders Port's personnel at Head office.

The following IMT roles and responsibilities will vary depending on the scale of the response.

The following Roles and Responsibilities in Table 2 are adapted from the NATPLAN and SAMSCAP and have been scaled down to reflect a rapid response under a level 1 incident.

Table 2: Roles and responsibilities of the IMT

ROLES AND RESPONSIBILITIES OF THE IMT		
IMT	ROLE	RESPONSIBILITIES
Incident Controller	• Manage all activities and personnel deployed to resolve the incident • Establish systems and procedures for the safety, health, and welfare of all response personnel and the community who may be involved • Issue warnings and incident information to the community and affected stakeholders	• Exercise leadership and establishment of the IMT • Set objectives for the incident response, considering the safety of responders and the community as a priority • Develop and approve actions and strategies to control the incident and monitor its progress • Provide information and warnings to communities so that they can make informed decisions • Establish effective liaison and cooperation with all relevant agencies, affected communities and others external to the IMT, including communications with the DIT Duty Officer and/or State Controller, when activated and collaborations between response and recovery agencies

ROLES AND RESPONSIBILITIES OF THE IMT

IMT	ROLE	RESPONSIBILITIES
Incident Controller contd.	• Manage relationships with agencies and people affected, or likely to be affected, by the incident • Liaise with the State Controller (if activated) to ensure the response is managed and coordinated effectively	• Obtain and maintain human and physical resources required for the resolution of the incident • Apply a risk management approach, and establish systems and procedures for the safety and welfare of all response personnel • Ensure appropriate financial delegations are in place and these delegations are made known to the appropriate response personnel • Ensure relief and recovery considerations are addressed
Operations Unit	• Implement strategies to resolve the incident • Manage all activities that are undertaken in the field • Manage all resources (people and equipment) assigned to the Operations Unit	• Obtain a briefing from the Incident Controller • Establish and manage the Operations Unit appropriate to the size and complexity of the incident, adjusting throughout the incident if required • Appoint sub-unit coordinators as required and delegate tasks • Provide a safe working environment for personnel in Operations Unit • Establish & maintain a log of activities & decisions for the Unit • Communicate Unit performance to the Incident Controller • Prepare shift handover and brief incoming Operations Unit and manage the continuity of Operations activities across shift changes
Planning Unit	• Evaluate and analyse intelligence on current and forecast situations, if scale of incident requires • Undertake risk assessments, provide information such as weather predictions and mapping, and prepare options analysis for the Incident Controller • Develop communications strategies for the incident, as required • Collect and maintain information on resources allocated to the incident • Provision of management support services and maintain the Common Operating Picture	• Obtain a briefing from the Incident Controller • Establish and manage the Planning Unit appropriate to the size & complexity of the incident, adjusting throughout the incident if required • Appoint sub-unit coordinators as required and delegate tasks • Provide a safe working environment for personnel within the Planning Unit • Establish and maintain a log of activities and decisions for the Planning Unit • Communicate Unit performance to the Incident Controller • Prepare shift handover and brief incoming Planning Officer and manage the continuity of planning activities across shift changes

ROLES AND RESPONSIBILITIES OF THE IMT

IMT	ROLE	RESPONSIBILITIES
Logistics Unit	• Provide logistical support for control of the incident and provision (and demobilisation) of: • Human and physical resources • Facilities (such as the ICC, equipment staging area, shoreline staging areas, wildlife rehabilitation facilities, forward operating bases, etc.) • Services • Materials	• Obtain a briefing from the Incident Controller • Establish and manage the Logistics Unit appropriate to the size and complexity of the incident, adjusting throughout the incident if required • Appoint sub-unit coordinators as required and delegate tasks • Provide a safe working environment for personnel in the Logistics Unit • Establish and maintain a log of activities & decisions for the Logistics Unit • Communicate Unit performance to the Incident Controller • Prepare shift handover and brief incoming Logistics Officer and manage the continuity of logistics activities across shift changes
Public Information Unit	• Development, review and dissemination of information, advice and safety messages to the public • Provision of timely and relevant information and safety messages to those who may be impacted by the incident • Ensure that the Control Agency is involved in the development and approval of media releases • Ensure that the Control Agency is kept up to date regarding media conferences and media releases	• Obtain a briefing from the Incident Controller • Establish and manage the Public Information Unit appropriate to the size and complexity of the incident, adjusting throughout the incident if required • Appoint sub-unit coordinators as required and delegate tasks • Obtaining information on the current and projected incident situation from the Planning or Logistics Unit when established • Maintain ongoing communications with the Planning and Logistics Unit regarding accuracy of information released to the public • Liaise with other agencies media personnel to ensure one consistent picture is provided to the public and disseminate incident information, and liaise with public and affected communities • Provide a safe working environment for personnel within the Unit • Establish and maintain a log of activities and decisions for the Unit • Communicate Unit performance to the Incident Controller • Prepare shift handover and brief incoming Public Information Officer and manage the continuity of Public Information activities across shift changes

Table 3: Marine Oil Spill Pollution legislation, incident levels, responsible agencies and governing spills and emergency plans relevant to FPH

INCIDENT LEVEL	INCIDENT LEVEL CLASSIFICATION	JURISDICTION/ CONTROL AGENCY	OIL SPILL MANAGEMENT PLAN	EMERGENCY MANAGEMENT PLAN	LEGISLATION
Level 1	Generally able to be resolved through the application of local or initial resources only (e.g. first-strike capacity).	FPH is the Response Agency (and Incident Controller) for spills occurring within FPH Port Waters (first-strike responders)	The FPH OSCP outlines FPH responsibility as the Manager of a Port in ensuring the Port has a contingency plan, appropriate training and equipment to respond to a Level 1 incident in FPH Port Waters.	FPH Site Emergency Response plans (SERPs) prescribe the responsibilities and actions required for emergency management planning and response for all FPH sites.	The Manager of a Port is responsible for ensuring that the Port has a marine spill response plan, trained first responders and first response equipment. These Managers are delegated under the Protection of Marine Waters Act (Prevention of Pollution from Ships) Act 1987 and ensure that Port Authorities have arrangements in place to undertake first response to any spill occurring in port waters
Level 2	More complex in size, duration, resource management and risk and may require deployment of jurisdiction resources beyond the initial response	DIT is the Control Agency and become Incident Controller (when escalation occurs a written handover from the FPH Incident Controller to the DPTI Incident Controller must be received)	The SAMSCAP integrates the NATPLAN with industry plans (such as OSCP) and coordinates state, Commonwealth and industry arrangements when a marine pollution incident exceeds the capacity of the port.	State Emergency Management Plan (SEMP) draws together the processes in place for dealing with emergencies and sets out the roles and responsibilities of government and non-government organisations when supporting the Control Agency during an incident.	Protection of Marine Waters (Prevention of Pollution from Ships) Act 1987, and its 2013 Regulations. This legislation prohibits the discharge of oil, noxious or hazardous substances (including garbage) within State waters from ships and land sources and makes provision to remove oil, noxious and hazardous substance, empower the Minister for Transport and Infrastructure to take possession of a ship, apparatus, or cargo in order to prevent or mitigate pollution, recover all direct expenses and liabilities arising from the discharge of oil, noxious or hazardous substances (as well as other related provisions)

INCIDENT LEVEL	INCIDENT LEVEL CLASSIFICATION	JURISDICTION/ CONTROL AGENCY	OIL SPILL MANAGEMENT PLAN	EMERGENCY MANAGEMENT PLAN	LEGISLATION
Level 3	Generally characterised by a degree of complexity that requires the Incident Controller to delegate all incident management functions to focus on strategic leadership and response coordination and may be supported by national and international resources.	DIT is the Control Agency (AMSA are responsible for NATPLAN and coordinating national resources in support of DIT)	The NATPLAN sets out national arrangements, policies and principles for the management of maritime environmental emergencies.	The Australian Emergency Management Arrangements	Protection of the Sea (Prevention of Pollution from Ships) Act 1983 and its Regulations. This legislation implements the International Convention for the Prevention of Pollution from Ships (MARPOL 73/78) and the International Convention on Oil Pollution Preparedness, Response and Co-operation 1990 (OPREC), and applies to all waters within Australia's Exclusive Economic Zone (EEZ).

5.4 Risk Identification

There are different types of risk associated with an oil spill from shipping and port operations. Emergency specific port-based risks are identified in the SERPs.

5.4.1 Spills risks potential

In recent years, FPH received an approximate average of 1803 ship visits per annum across its seven ports. The 2023 calendar year numbers show the following port visits:

- Klein Point – 287
- Port Adelaide – 1155
- Port Giles – 26
- Port Lincoln – 107
- Port Pirie – 73
- Thevenard – 124
- Wallaroo - 24

In 2023, 143 ship visits were tankers into Port Adelaide and 14 into Port Lincoln. The majority of these cargoes are refined petroleum products – Diesel, ULP, PULP and Avgas, but can also include vegetable and animal oils (refer to section 7.1.2 for characteristics of fuel type).

Other vessel types such as dry bulk carriers and container ships, have a risk of spill of bunker fuel from rupture of a tank (normally a HFO 380 or IFO 180), during fuel bunkering operations or fuel transfer on-board the vessel. Smaller quantities of diesel and other lighter fuel products are often carried by these vessels.

Smaller commercial vessels and cruise vessels normally utilise diesel or marine diesel as their bunker fuel.

5.4.2 Type and quantities of potential spills

Spills may occur directly from a vessel such as small quantities of lubricating and hydraulic oil carried onboard, tanker cargo transfer, vessel grounding or collision and bunker fuel rupture. There are also shore-based facilities that pose a risk of spill from fuel storage, shore to ship bunkering, stevedoring and other equipment.

The more probable risk for FPH lies with small spills from tanker cargo transfer operations, normally less than 20 tonnes volume, and would normally be a refined product. There are inherent risks associated in dealing with these products listed at section 7.1.2.

A vessel grounding or collision may also result in a spill. Recreational and smaller commercial vessels are susceptible to lesser spills of lighter products, and larger commercial vessels will potentially spill bunker fuel oils.

A grounding is an uncontrolled event, and the ability to rapidly prevent a loss of oil is limited by many factors. The loss of oil in a grounding with a larger vessel, is usually an instantaneous loss, and the volume could exceed hundreds of tonnes of oil.

Shore-based facilities that handle hydrocarbons in bulk, whether importing or exporting fuels or oils, or bunkering vessels, pose a greater potential risk for spills. This risk is typically from the infrastructure ashore, where failures of valves, pipelines and bunded areas, may allow oil to enter Port waters.



Smaller vessel operations such as re-fuelling, slipping, groundings, collisions and bilge discharges are relatively commonplace, but normally involve smaller quantities of lighter oils. Lesser risks (due to the smaller quantities involved) in port waters, originate from stormwater run-off through drains from stevedoring operations involving land-based incidents and the loss of hydraulic type oils and ship cargo equipment loss of hydraulic type oils.

5.4.3 Sensitivities at risk

1. Ecological risk

Generally, in port areas, the environmental risks are associated with the exposed inter-tidal ecosystems on shorelines (seagrass and mangrove communities) and marine fauna. These areas support substantial numbers of marine species and bird life, particularly in surrounding marine parks and sanctuary zones. The protection of both the fauna and their habitat in which they breed, roost and feed, is a key response priority. With some products, particularly diesel, a degree of dissolution into the water column can occur, and that potentially will affect sub-surface species like fish and mammals, along with sub-surface organisms like seagrass and kelp.

There are extensive sanctuary zones and marine parks throughout South Australia. A map of SA Marine Parks is in Appendix D. DEW also provides spatial mapping of SA natural resources, including native flora and fauna, which can be viewed at <https://data.environment.sa.gov.au/NatureMaps/Pages/default.aspx>.

FPH has developed a desktop review of marine ecosystem health and risks for its seven South Australian ports. This report details port specific sensitive ecosystems and should be referred to the ICT environment and scientific advisors.

2. Economic risk

Oil spills will potentially affect the operation of a port, by restricting vessel movements whilst clean-up operations are underway. Commercial vessel operators in the tourism and fisheries industries could also be affected. Aquaculture industries operating in or near port waters could be seriously affected by impacts into their areas of operation. Diesel dissolved into the water column could impact on caged aquaculture. Other economic activities that may be affected, include shore based and on-water tourism ventures, restaurants and hotels, accommodation facilities, commercial fishing, and sea-water intakes. Local knowledge is essential in determining economic assets that may be impacted by a spill.

3. Social-cultural risk

The effects on cultural, heritage and social amenity can take many forms, but the possibility of impacts on indigenous sensitive areas, marine protected areas, recreational shorelines, and community use areas, need to be considered as protection priorities.

Local knowledge and State Environmental and Scientific Coordinator (ESC) advice should be sought, to inform decision making around ecological, economic and socio-cultural risk assessment.

06 Incident Reporting

All marine pollution incidents are required to be reported under the requirements of SAMSCAP, and may be made to:

- Flinders Ports VTS at Port Adelaide (08) 8447 0902 (24/7 number) or call on VHF radio channel 12 – monitored 24/7;
- Alternative number (08) 8447 0903
- EPA Pollution hotline ((08) 8204 2004 or 1800 623 445 (non-metropolitan callers)
- The AMSA Rescue Coordination Centre (1800 641 792 – 24 hours).
- SA Police on 000, local police station or Police Communications Call Centre on 131 444.

All reports, if not originally reported to VTS, must be forwarded to the VTS on (08) 8447 0902, as soon as possible. The VTS will record and forward all reports to the Flinders Ports Incident Controller, the relevant internal stakeholders including the relevant General Manager Flinders Ports, Manager Port Operations, General Manager Health, Safety and Systems and to the DIT Duty Officer.



When reporting a spill, as much detail as possible should be provided, with the following

information required as a minimum:

- Verify the authenticity of the spill
- Determine what the product is
- Determine location of spill source
- Determine whether the product is still leaking
- Determine the direction of movement of the oil – from observation and/or from current and wind data modelling (OSTM)
- Determine the volume of the spill if possible.

The 'originator' of a spill may initiate a response and must report the spill to the VTS as soon as possible and within 2 hours of the spill becoming known.

Once reported to Flinders Ports, an investigation of the spill is to be undertaken to determine if it occurred in Flinders Ports designated waters. If the spill occurs in Flinders Ports designated waters, and the originator's response is deemed inadequate, Flinders Ports will intervene in the response, taking control of the response with assistance from the spill "originator".

Where the spill is beyond the capability of the originator or first-strike response agency to manage, this is to be reported to the VTS who will pass the information onto the DIT Duty Officer and the State Controller. The State Controller will decide whether or not to activate the SAMSCAP.

07 Spill response strategies

Prior to developing spill response strategies, the priority is to undertake the initial assessment (further detail in section 8.1) to determine what the product is. Safety Data Sheets (SDS) are to be consulted when the product is known. If the product is unknown, the characteristics must be determined, prior to operating in the immediate area of the spill. This may require spill sampling and testing.

Commercial quantities of ULP, PULP and Avgas/JetA1 are shipped into some of the ports managed by FPH, and these are all flammable hydrocarbons with low flash points. In concentrated quantities, flammable atmospheres may be produced, and combustion may occur. Strategies should include staying up-wind at all times.

Smaller spills from fishing vessels, commercial vessels, and marine re-fuelling locations, can also produce flammable atmospheres with a freshly spilled product. These spills should only be approached once the Lower Explosive Limit is tested by qualified operators (diesel and HFO may produce flammable atmospheres when concentrated in sheltered areas, but it is less likely).

FPH also imports and exports vegetable oils from Port Adelaide. These products, although not containing hydrocarbons, can still severely impact the environment by smothering, and a response strategy is required.

To determine the response strategy, the Incident Controller needs to determine the movement of the oil. The direction and speed can be ascertained by observation, or by the use of an Oil Spill Trajectory Model (OSTM), or by manually plotting by utilising wind and current speeds. The OSTM can be requested under the NATPLAN and can only be made by the Commonwealth or state spill control agency (and by the Australian Marine Oil Spill Centre). In the event FPH requires an OSTM, they will request the State Controller to lodge a request on their behalf.

Once the location and movement of the oil has been determined, there is a need to ascertain if there is sufficient time to contain the oil, at or near the source of the spill. There are numerous response strategies available to responders (refer to section 4.4 for equipment storage locations).

Every response strategy will require robust communications systems. Marine VHF radio is used to communicate with vessels, aircrafts and personnel on the ground. The use of mobile phones and UHF radio is also regarded as robust, although potentially with 'blind spot' locations, in some port areas. SA utilises a state-wise digital radio system, which would be implemented in a repose, where other forms of communications are insufficient.

7.1 Spilled oil behaviour

7.1.1 Factors affecting oil on water

Spilled oil will travel in a direction on water, that is driven by the full effect of the current (100%

current speed) and about 3% of the wind speed. The final direction will be a combination of these

effects. The use of vectorisation will assist in determining the probable movement of the oil.

For each of the seven ports of FPH general water movement is provided in Figure 3.

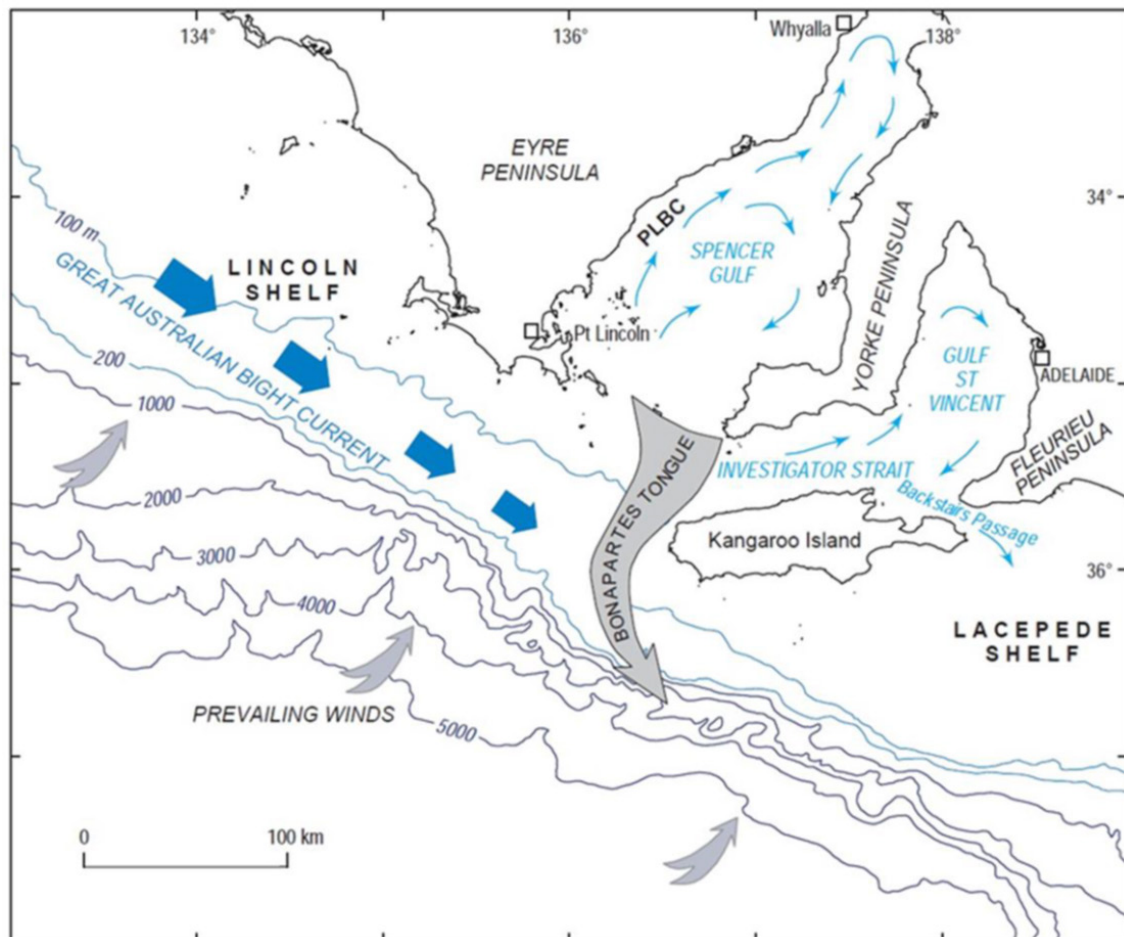


Figure 3: Flinders Ports assessment for Oil Spill Exposure Assessment for new berth facilities by RPS APASA 2015

7.1.2 Spilled Products

The following products are those that are deemed more probable to be spilled into waters managed by FPH. Safety Data Sheets (SDS) will provide more information on all products, thus the prior identification of the spilled product is paramount in any response.

- Heavy Fuel Oil (HFO) – will generally float in all conditions, with emulsification occurring after about 1-2 days. Very little evaporation and/or dissolution will occur
- Intermediate Fuel Oil (IFO) - will generally float in all conditions, with emulsification occurring after about 1 day. Some evaporation and/or dissolution will occur
- Diesel – the majority will float, with a small percentage dissolving into the upper layers of the water column. Diesel will tend to completely evaporate in 24-72 hours depending on air and water temperatures, and the amount of sunlight and wind action that it is exposed to
- Premium Unleaded Petrol (PULP) and Unleaded Petrol (ULP) – will rapidly evaporate with some dissolution. Normally it evaporates within 4-8 hours. It can produce flammable atmospheres in high concentrations in sheltered areas
- Avgas/JetA1 - will rapidly evaporate with very little dissolution. Normally evaporates within 1-2 hours. It can produce flammable atmospheres in high concentrations in sheltered areas

All products in concentrated amounts, particularly when freshly spilled, can produce flammable and dangerous atmospheres, and should be approached with caution (Australian Code for the Transportation of Dangerous Goods by Road & Rail, 2024). Testing of atmospheres (Lower Explosive Limit) is recommended when spilled product is concentrated in confined areas. Expert advice is to be sought from the Metropolitan or Country Fire Service. The effect of the wind will dissipate these atmospheres. Work from up-wind when these situations occur. The likelihood of these flammable and dangerous atmospheres occurring, is significantly reduced, once the lighter ends have evaporated or dissipated.

It is highly unlikely that booming operations will ever be undertaken to contain freshly spilled PULP, ULP and Avgas. Booms can be utilised to protect or deflect these products away from sensitive resources, well downstream of the spill, ensuring that there are no flammable vapours anywhere near the area in which booming operations are being undertaken. The light ends of these products tend to evaporate rapidly once spilled.

7.2 Available response strategies

Several response strategies are available, including

- Monitor and evaluate
- Contain and recover – containment booming and sweeping operations
- Protect and deflect – exclusion or deflection booming
- Vessel propeller wash flushing
- Shoreline clean-up
- Waste management
- Wildlife response

The following list provides examples of protection priorities within State waters (SAMSCAP) when develop response strategies:

- Marine, estuarine and shoreline habitat
- Rare and endangered plant and animal species
- Aboriginal and other cultural heritage resources
- Commercial and recreational fisheries resources
- Private and public property
- Visual and recreational amenity.

A Net Environment Benefit Analysis (NEBA) can be undertaken for effective oil spill preparedness and response. The NEBA is a valuable process used in spill response planning to help make the best choices to minimise impacts of oil spills on people and the environment. Access to the NEBA is only at www.api.org.

Response strategies need to take into account small inlets and waterways, as well, as other sensitivities such as wildlife that need protection. In the event the spill puts sensitivities outside of FPH water at risk, the Incident Controller must notify the DIT Duty Officer.

In general terms, sensitivities occurring in the inter-tidal zone will be prioritised for protection, including resources above the normal tidal zone (including social and economic assets), by protecting the marine area surround the assets, through exclusion booms.

7.2.1 Model, monitor and evaluate

The task of determining the location of a spill and where it is going, in the confined waters of a port, is best served by visual observation. The use of vessels or rotary aircraft should be utilised where daylight permits. The use of local knowledge with tidal and current flows, and the known wind strength, will provide an indication of potential movement. OSTM is available commercially to determine the trajectory of the spilled oil. This can take in excess of 2 hours to become available.

7.2.2 Containment and recovery

The use of booms to contain the spill at the source, or to capture the free-floating oil by undertaking sweeping operations, is explained below. The priority is containment. Recovery of the oil is initially secondary. The most effective response is to contain the oil at the source when safe to do so.

The containment of ULP, PULP, and Avgas/JetA1 at the source of the spill, is not to be attempted on freshly spilled product, without atmospheric testing being undertaken by adequately trained and equipped personnel. Utilisation of vessels, booms and anchors to encircle or capture the oil where spilt, prevents the spread of oil.

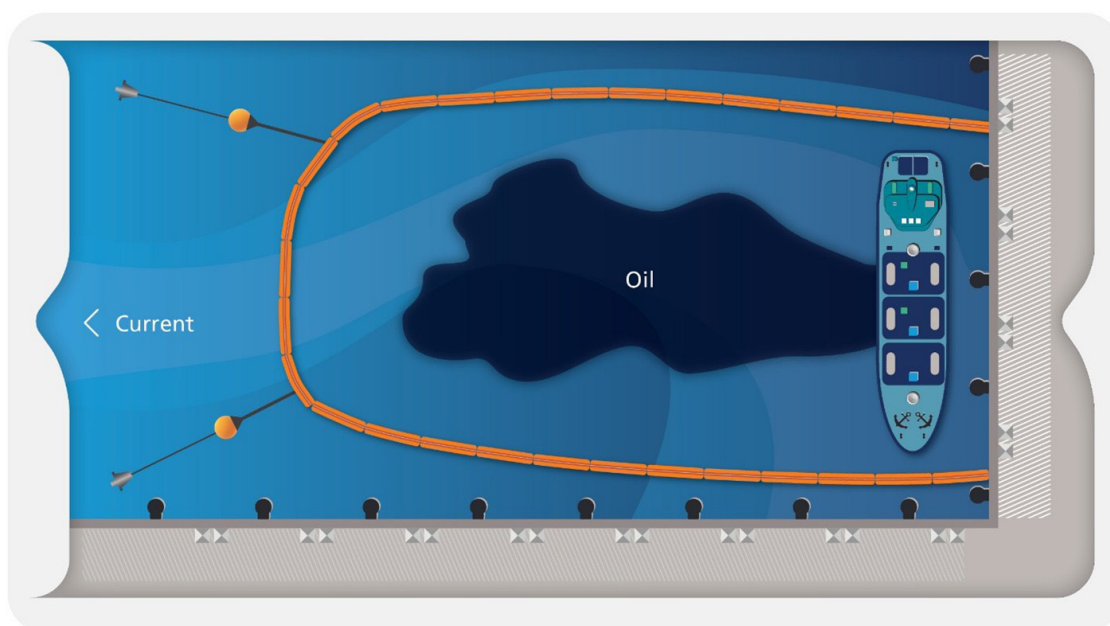


Figure 4: Boom deployed around vessel with anchors to contain oil spill

The intent is to start at the down-current/wind extremity of the slick, utilising two vessels with boom between them. The boom should be slowly pulled back toward the source, until such time as it can be joined in a circular arrangement around the source or sealed against a shoreline. If the source is from a larger vessel or ship, then the boom may be deployed from the bow & stern of the ship rather than encircling it (using the side of the vessel as a barrier to the oil) and anchored off.

The same applies if the source is from a drain or pipe, then the boom should be deployed from the shore, either side of the outlet, encircling it, and anchored off.

Once in position, the boom will need to be anchored/secured so that the spill source is contained within the boomed area. The other opportunity with the same boom and two vessels is to run ahead of the spill and utilise the boom to capture or slow down the rate of spread. This is called boom sweeping operations.

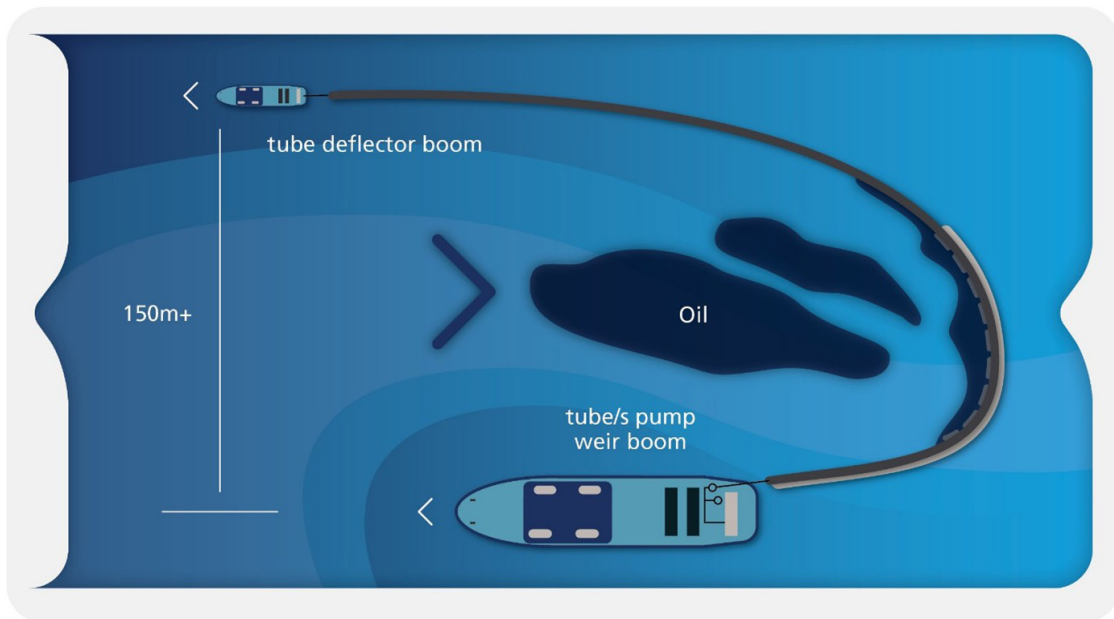


Figure 5: Boom sweeping operations - two vessels run ahead of the spill and utilise the boom to capture or slow down the rate of spread.

Caution should be used with vessel speeds when pulling boom with oil in the apex of the boom. Any speed greater than one (1) knot through the water will tend to release oil underneath the boom.

Once the oil is captured within a boom, the oil is to be recovered by the use of skimmers. Where the thickness of the oil is thin, or the oil is of a lighter type, the use of sorbents may be useful in cleaning up smaller sized spills. The use of portable storage devices, like floating Towable Storage Bladders (TSB) or barges, are useful in temporarily storing oily/ water waste on water. Other methods can utilise portable storage tanks (including IBCs) on the decks of vessels, as temporary storage.

The equipment required for this response type includes:

- Vessels with adequate horsepower to pull booms through water
- Booms (fence, solid flotation, self-inflating, air inflated)
- Anchors (size/type dependant on winds, currents, boom size and depth of water)
- Storage tank (TSBs, barges, tanks, IBCs)
- Ancillaries (ropes, hull magnets, shackles, PFDs)

7.2.3 Protect and deflect

Where the opportunity does not exist for containment booming at the source of a spill, consider the use of booms to protect sensitivities. Use to deflect or direct oil away from sensitive areas to less sensitive areas, where recovery is easier.

The use of booms in a chevron arrangement is a useful strategy to protect sensitivities that are surrounded by water or are subject to stronger current influences. Use sufficient lengths of boom to protect the width of the sensitivity, with the mid-point anchored toward the direction the oil flow is coming from, and the two trailing ends anchored or moored either side of the sensitivity, the oil is then deflected to either side of the sensitivity.

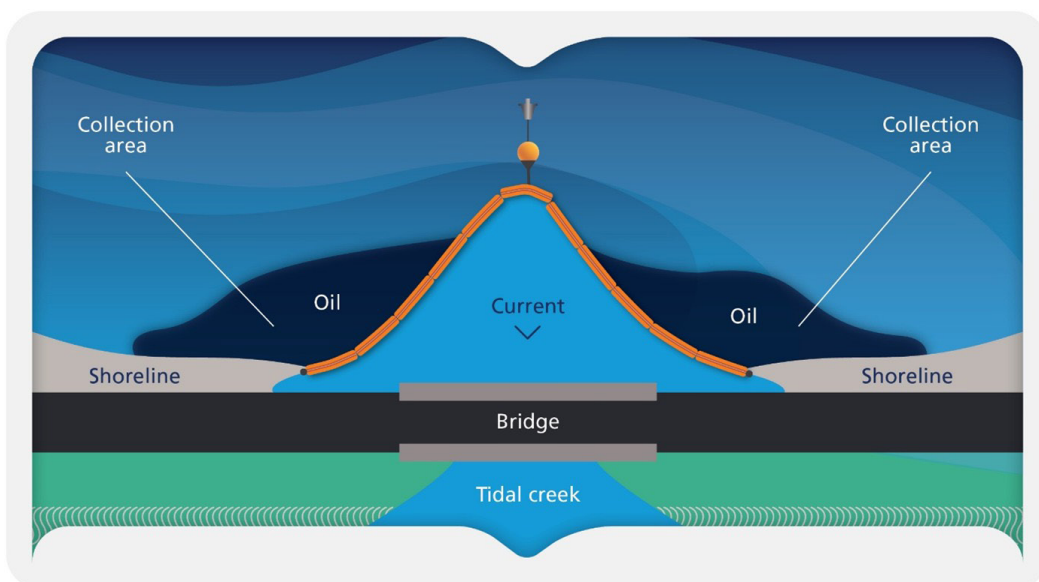
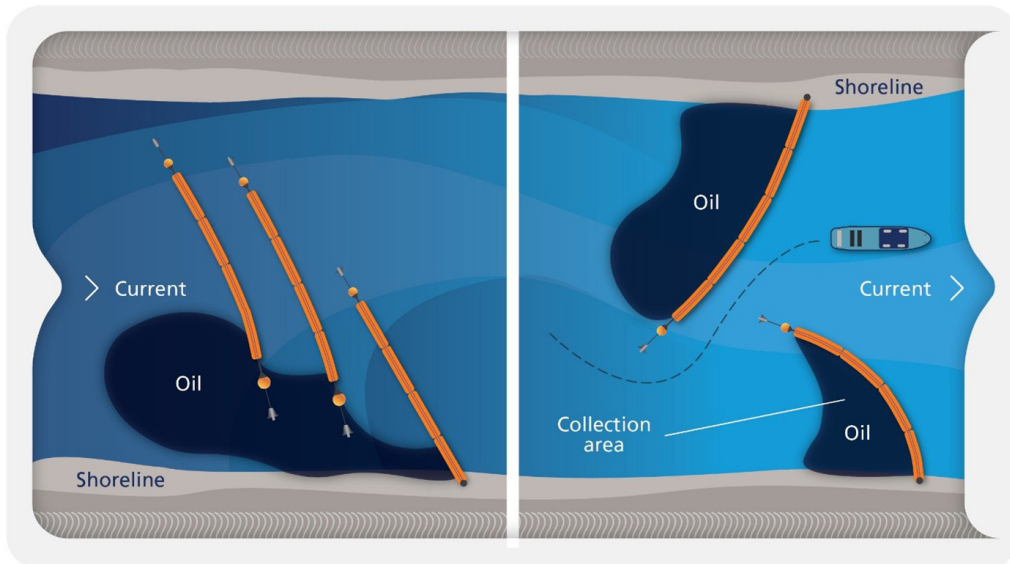


Figure 6: The use of a boom in a chevron arrangement to stop flow into backwaters and direct the oil onto the shoreline for collection.

The protection of small individual sensitivities may be successful with the use of protection booms to exclude the oil from impacting the sensitivity. The use of shoreline and solid buoyancy/inflatable booms, anchors, lines and a vessel to deploy, to surround the sensitivity, can be effective strategy.

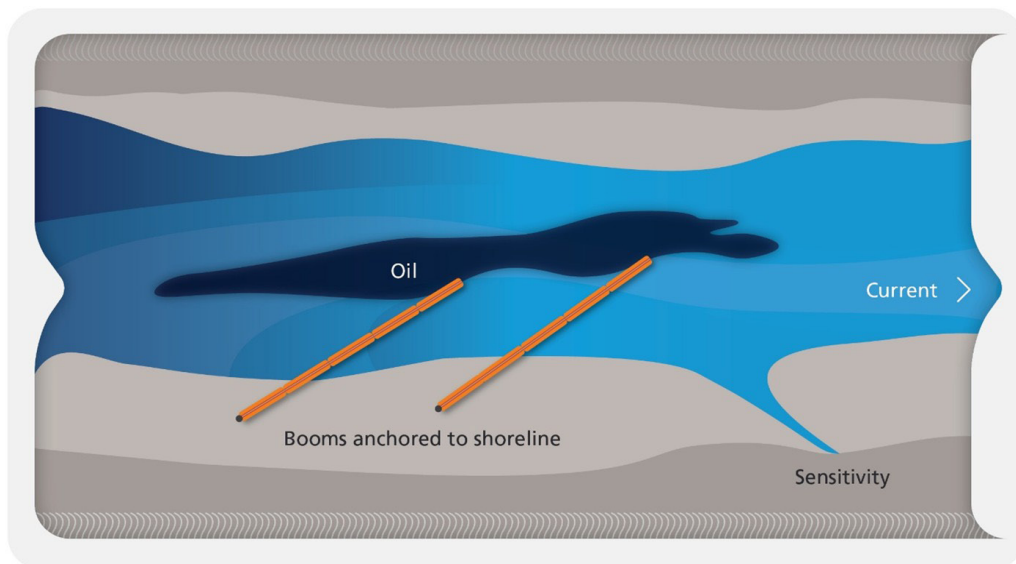
Another effective booming strategy is the use of the shoreline and solid buoyancy/inflatable booms, running back against the water flow at angles of $< 70^\circ$. This directs the oil onto the shoreline where it is more easily collected. This strategy is also used to direct oil onto areas that are less environmentally sensitive (e.g., heavy oil on a hard-packed sandy beach).

Figure 7: The use of a booms on an angle to direct the oil to the shorelines for collection



This booming strategy can be utilised to deflect the oil away from a shoreline. The boom is run at angles of $>110^\circ$ (with the flow of the prevailing water movement) from a suitable shoreline, to deflect the oil away from the sensitivity.

Figure 8: The use of booms to deflect oil away from a shoreline



These strategies can be used ahead of the spilled oil, to protect the potentially impacted sensitivity, and/or direct the oil to a more sheltered and/or accessible area, where product recovery is easier to achieve. This strategy requires continuous review, as water/oil flow direction can change with tidal current and wind direction changes

7.2.4 Product removal

Once oil is contained, the next priority is to remove the bulk oil it from the surface of the water. The use of sorbent materials is a possibility for very small spills where the product spilled is of a lighter nature (e.g., ULP, PULP, Avgas/JetA1, and Diesel). A skimming system is the preferred method of removing oil from the surface of the water.

Equipment suitable for this task includes:

- Weir skimmer
- Brush/disc/drum skimmer
- Oleophyllic skimmer (rope-mop)
- Vacuum skimmer (not to be used on lighter products)
- Vacuum trucks (not to be used on lighter products).

If the spilled oil is contained in a boom offshore, then the use of vessels to deliver and operate the skimming gear at the site of the contained oil is required. Additionally, portable tanks will be required to hold the recovered product

7.2.5 Vessel propeller wash flushing

The propeller wash from a response vessel may be utilised to direct the surface flow of spilled products away from sensitive areas, and/or into boomed areas for collection, by the gentle use of the wash.

A propeller should not be used to agitate the oil so that it mixes into the water column.

7.2.6 Shoreline clean-up operations

When protection strategies do not prevent the oil from impacting shorelines, shore-line clean-up strategies will need to be implemented. A number of methods can be used to clean shorelines impacted by oil. The selection of a suitable clean-up method must be made with regard to:

- Shoreline type (e.g. rock, sand, mud)
- Amount of oil present and degree of oil impact
- Properties of the oil (viscosity etc.)
- Distribution of oil on the shoreline, and in the sediments
- Wave energy present
- Oil remobilisation potential
- Accessibility to the shoreline
- Biological and other character of shoreline and
- Available equipment and labour.



Shoreline clean-up operations should commence as soon as practical following an impact and can be considered in stages; emergency phase, project phase and polishing phase. The longer the oil is on the shoreline, the greater the impact; the greater the potential for permeation into the substrate; and an increased risk of the oil remobilising on subsequent high tides and depositing on unaffected shorelines.

The shoreline types potentially impacted and a general guideline for clean-up is provide in table 4.

Table 4: Shoreline types and general clean-up options

SHORELINE TYPES AND GENERAL CLEAN-UP OPTIONS		
SHORELINE TYPE	PREFERRED CLEAN-UP METHOD	OPTIONAL METHOD
Rocky Cliff	Low pressure flushing and oil collected	Natural cleaning and recovery
Rock and boulder	Low pressure flushing and oil collected, manual clean-up	Natural cleaning and recovery
Cobble, pebble and gravel	Low pressure flushing and oil collected, move oiled sediment into surf zone or mechanical reworking to mobile oil and oil collected	Manual collection and removal of waste
Sandy Beach	Flushing, surf washing, mechanical or manual clean-up	Natural, ploughing, sand sieving
Mangrove, saltmarsh, mudflats	Allow oil to naturally weather if risk of trampling/degrading the habitat during cleaning activities	Flooding or flushing shoreline (low pressure flushing) and displace oil collected
Intertidal seagrass	Allow oil to naturally weather if risk of trampling/degrading the habitat during cleaning activities or collect oil at high tide	Low pressure washing may be possible if unlikely to disturb sediments
Shallow subtidal seagrass, kelp and other subtidal areas	Unlikely as not exposed at sea surface, however, if become oiled allow for natural recovery	Oiled fronds may be collected when exposed at low tides
Ports, harbors and other facilities	Pressure washing bulk oil, fine cleaning where possible, oil collected	

Dispersants must not be used in SA State Waters without the authorisation of the State Controller. FPH will not be involved in the application of dispersants.

The response strategies listed above (both on-water and on-shore) may be undertaken concurrently to reduce the time oil remains on the surface of the water and the shoreline.

7.2.7 Waste Management

Any oil recovery operation will generate waste liquid, and potentially solids. Early consideration of waste storage and transport will need to be planned. Waste will include liquids recovered from skimming operations, as well as solids from impacted shorelines. A waste management strategy will be developed for most responses that will indicate storage capacity available, locations of temporary storage sites, transport arrangements, approvals for transport and disposal, and determination of the destination of that waste.

7.2.8 Wildlife Management

The DEW manages the South Australia Oiled Wildlife Response Plan (SAOWRP) in SA State waters (this is a sub-plan of the SAMSCAP). The SAOWRP details on-ground information including wildlife values, high risk wildlife areas, identified oiled wildlife facilities, equipment resources and contact lists. The SAOWRP can be viewed at <https://www.environment.sa.gov.au/topics/animals-and-plants/animal-welfare/oiled-wildlife-response-plan>.

08 Spill response operations

The priority for FPH, in responding to a level 1 pollution incident, is the health, safety and welfare of the community, response personnel and other marine users, and will be considered above all other priorities. Once health and safety are managed, response activities will focus on the protection of the environment. Other protection priorities will be considered dependant on the location of the incident, prevailing conditions, reality of success and availability of resources.

8.1 Initial incident assessment

In responding to a Level 1 incident the FPH Incident Controller (section 5.2) will undertake an initial incident assessment, with the aim of building situation awareness for the IMT. This is gained by the receipt of accurate information and intelligence, and deployment of resources to undertake surveillance.

The Incident Controller is to organise an assessment to determine the following:

1. Verify a spill has taken place
2. Determine what the product is
3. Determine the locations of the spill source and the spill originator
4. Determine whether the product is still leaking
5. Determine the direction of movement of the oil



6. Determine the volume of the spill if possible
7. Determine local tides, tidal flow direction and speed
8. Determine local wind speed and direction
9. Identify nearest sensitivities at risk
10. Determine areas to be protected
11. Undertake notifications as required.

The Incident Controller is to initiate this OSCP, in the event a spill incident is deemed to have occurred in FPH waters and fulfil the requirements of a Level 1 incident.

The Incident Controller, as first-strike responder, is to develop strategies to ensure that the spill impacts are limited by stopping the flow of the oil spill, and to take action to prevent the spread of the spill, and to reduce its impact on sensitive resources, when safe to do so.

As indicated at Section 7, the initial identification of the spilled product is paramount. The Incident Controller is to liaise directly with the spill originator to determine the location, status, product, volume, and access MSDS and other intelligence as required. A plan to identify the spilled product, determine a volume, ensure the flow has ceased, restrict the movement of the product, and/or protect sensitivities, as well as communicate this information to relevant stakeholders, is to be created based on the port specific requirements. This will require the identification of resources required to respond, the organisation of the transport of resources, and the deployment of those resources.

8.2 Response implementation

Following the initial assessment, and the initiation of the OSCP, the Incident Controller will develop and communicate a response strategy including:

- Assess the situation as reported and determine what level of response is required
- Form an IMT (as per section 5.2), commensurate with the scale and complexity of the spill
- Develop response strategies, including availability of resources, assessment and prioritisation of sensitivities for protection (refer to section 7.2)
- Assess likely incident duration
- Notify the State Controller and other organisations, if required (as per table 2)
- Implement strategies and plans commensurate with the size and complexity of the spill.

In the event of protracted incident management consideration must be given to the provision of relief personnel early in incident response (as per section 5.2. ICT roles and responsibilities).

8.3 Incident progress review

A continual reassessment of the response is to be undertaken, throughout the operational stage. This needs to include:

- Success of containment and clean-up strategies
- Is the scale of the response still appropriate
- Are logistics still suitable and adequate
- Recovery rates of waste material
- Is the notification and reporting system still appropriate.

Feedback from field operatives will inform the basis of these reviews, as well as surveillance reports and public supplied intelligence.

8.4 Records management

With all oil spills into Port waters, and with the polluter identified, all reasonable costs incurred in the clean-up response, are normally recoverable from the polluter. As a result, good records are to be kept with respect to the incident response, including services provided and the costs expended. Logbooks should be maintained by decision makers in the IMT, and field operatives, particularly around key response decisions that could have an impact on cost recovery.

All records are to be supplied to the Incident Controller on request.

8.5 Response termination

8.5.1 Responsibility

The Incident Controller is responsible for terminating a Level 1 response. This decision must be made in conjunction with the General Manager Flinders Port and State Controller if necessary. Verbal notification of the response termination must be supported later, by written confirmation, indicating time and date of that decision. A level 2 or 3 response must be terminated by the State Controller in consultation with the Incident Controller.



8.5.2 Process

The response to an oil spill will be terminated when specific objectives and end points are met or achieved. The objectives will be identified by the Incident Controller when developing response strategies. Some examples of end points are:

- The complete removal of free-floating oil
- The removal of all accessible oil on shoreline
- There is no remobilisation or re-oiling occurring after each tide on shoreline
- There is no environmental benefit in continuing the clean-up
- Expert advice recommends no further action is required.

8.6 Incident Recovery

8.6.1 Debrief

As per the requirements of the SEMP (Annex E) and SAMSCAP, within 3 weeks of the completion of a marine spill response, a debrief will be convened by FPH, to capture any lessons learned. A summary of the debrief, including recommendations and/or actions required to be undertaken, will be supplied to the State Response Advisory Group through the DIT.

The debrief should address, but not be limited to:

- Key issues and risks, including work health and safety
- Spill causes (if known)
- Spill response and speed of response
- Operations
- Effectiveness
- Equipment accessibility, deployment and suitability
- Integration of plans and procedures with other response agencies
- Communication/coordination effectiveness

8.6.2 Recovery

Additional recovery activities, post an oil spill response, may include:

- Post spill monitoring studies of impacted sites
- Follow up with stakeholders to ensure satisfaction with the clean-up
- Ensuring financial and legal obligations are resolved
- Cost recovery
- Equipment repatriation, repair or replacement.

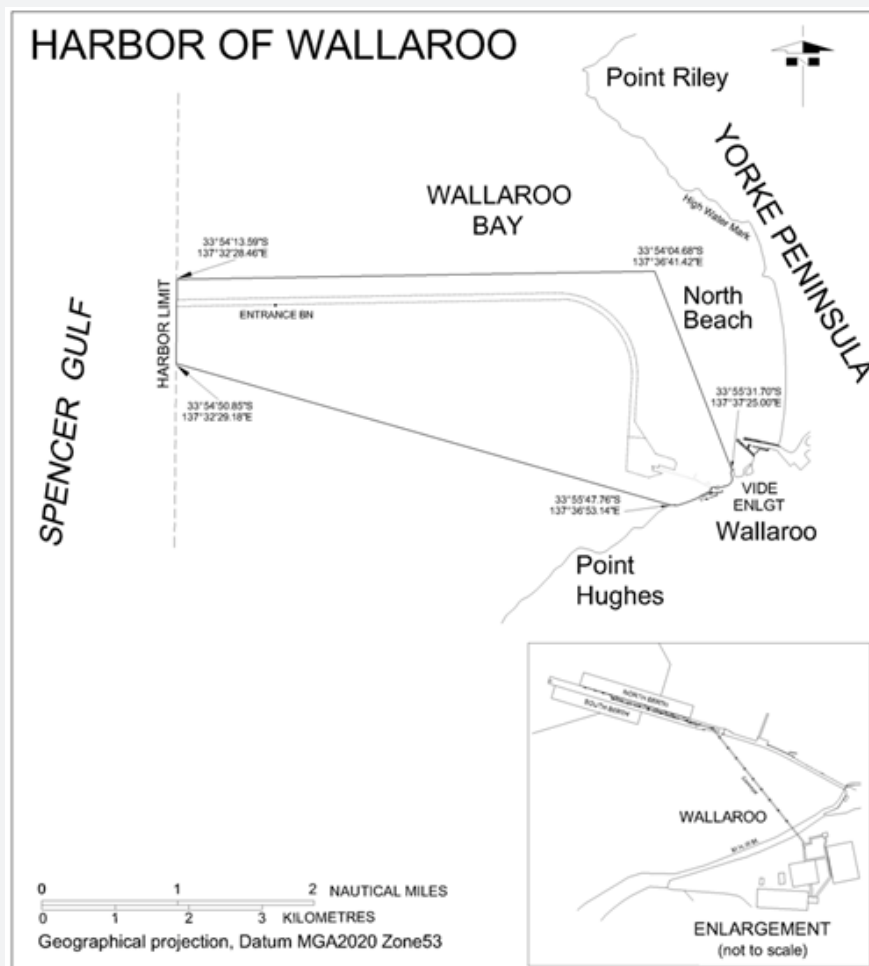
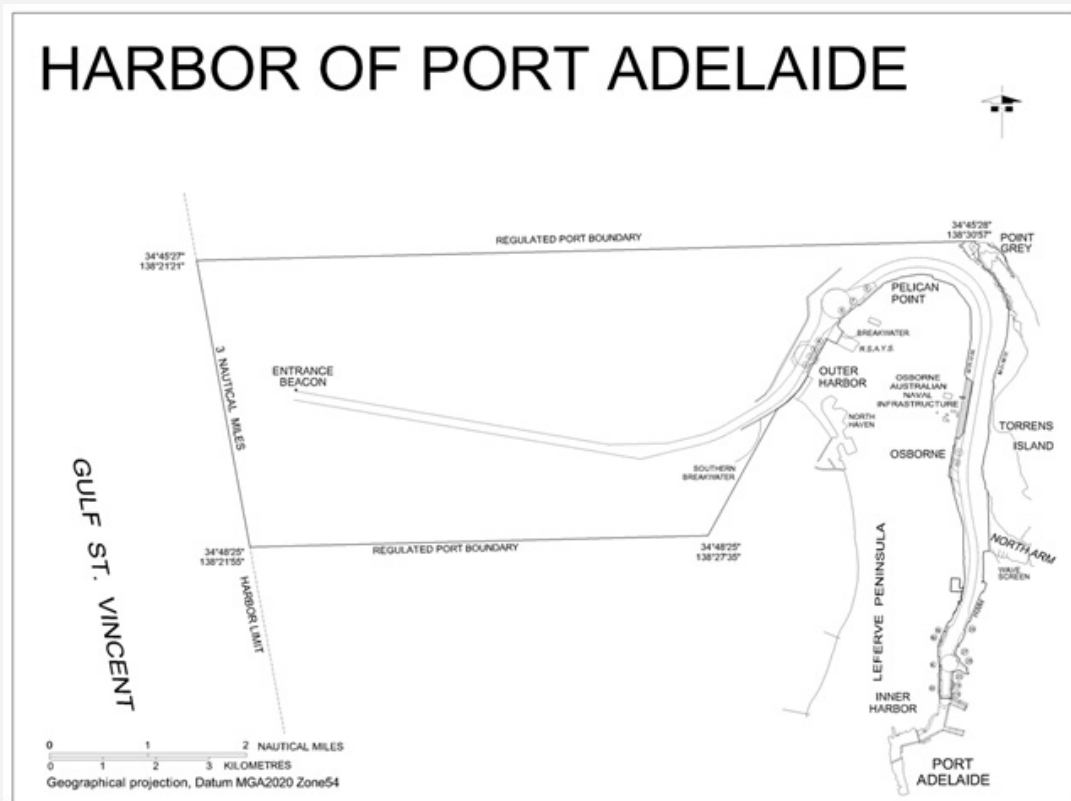
09 Capability maintenance

The Port Operating Agreement, defined in the Harbors and Navigation Act 1993 and the SAMSCAP, requires FPH to have appropriate resources (including appropriate contingency plans and trained staff and equipment to deal with emergencies (including marine oil spill response). FPH is required to ensure capability maintenance as follows:

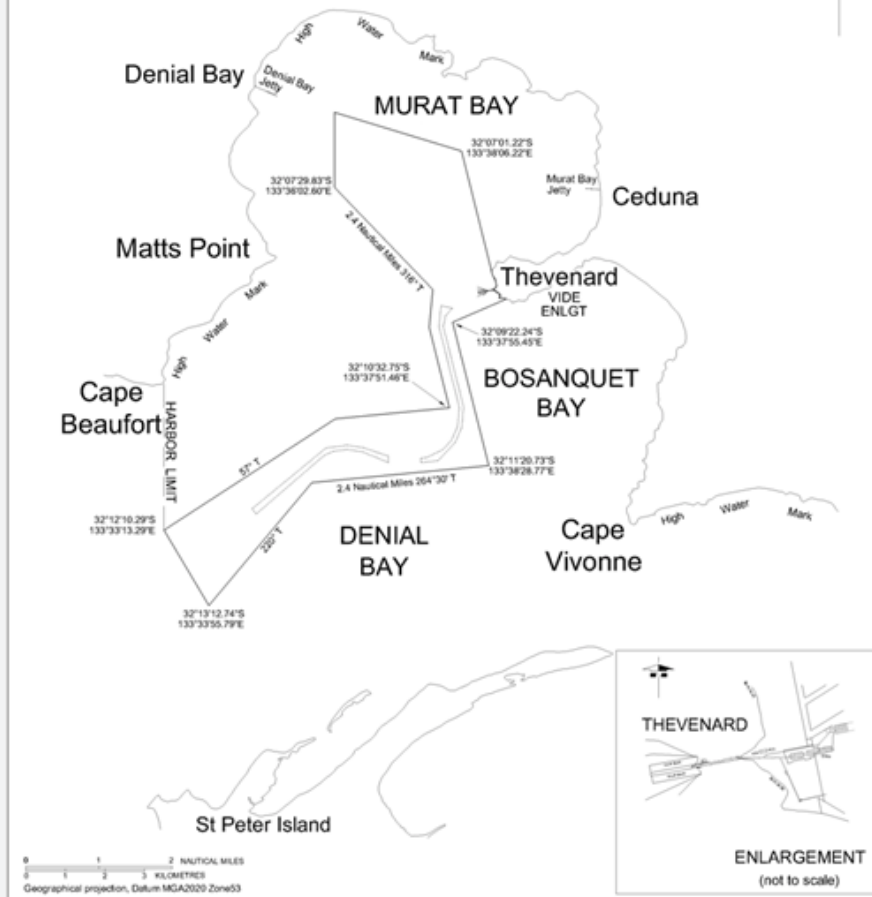
- Personnel – maintain sufficient numbers of trained personnel to provide an adequate response to a level 1 spill in port waters
- Equipment – maintain access to suitable response equipment to provide an adequate response to a level 1 spill in port waters
- Training – provide training to ensure responders are sufficiently trained to effectively respond to a level 1 oil spill in port waters
- Exercising – test the OSCP annually, as a minimum requirement
- Records – maintain records that this plan has been reviewed and exercised, and that responders have undertaken training.



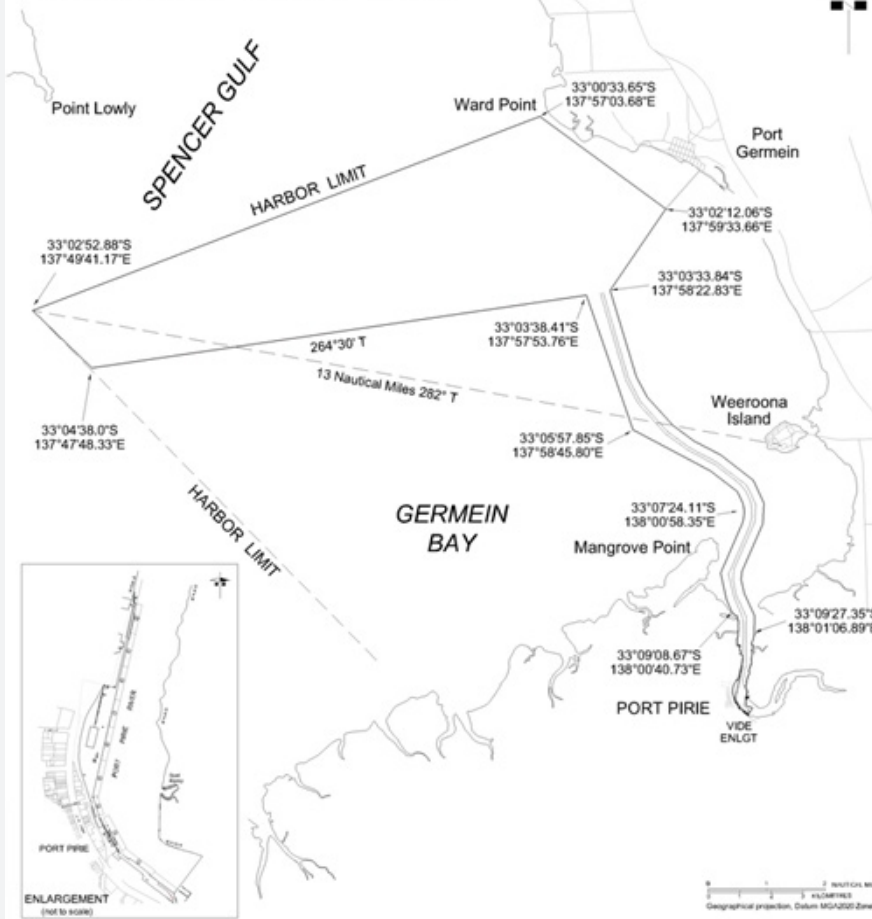
Appendix A: FPH Port Plans

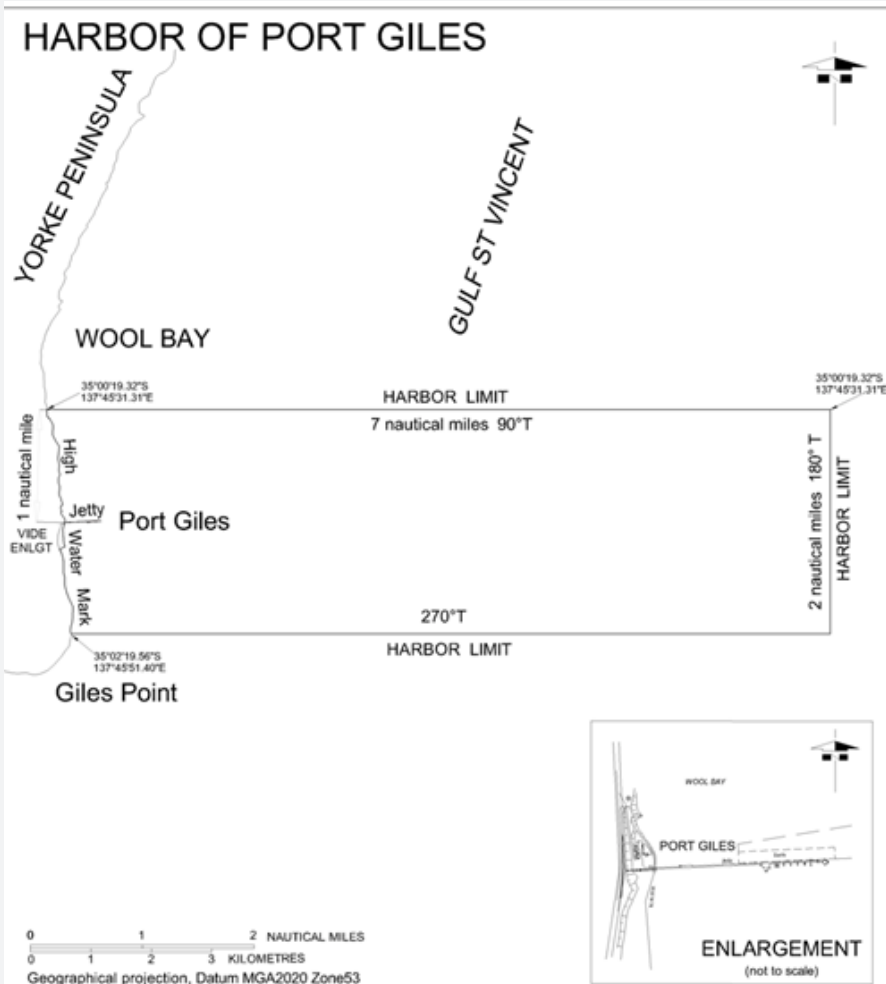
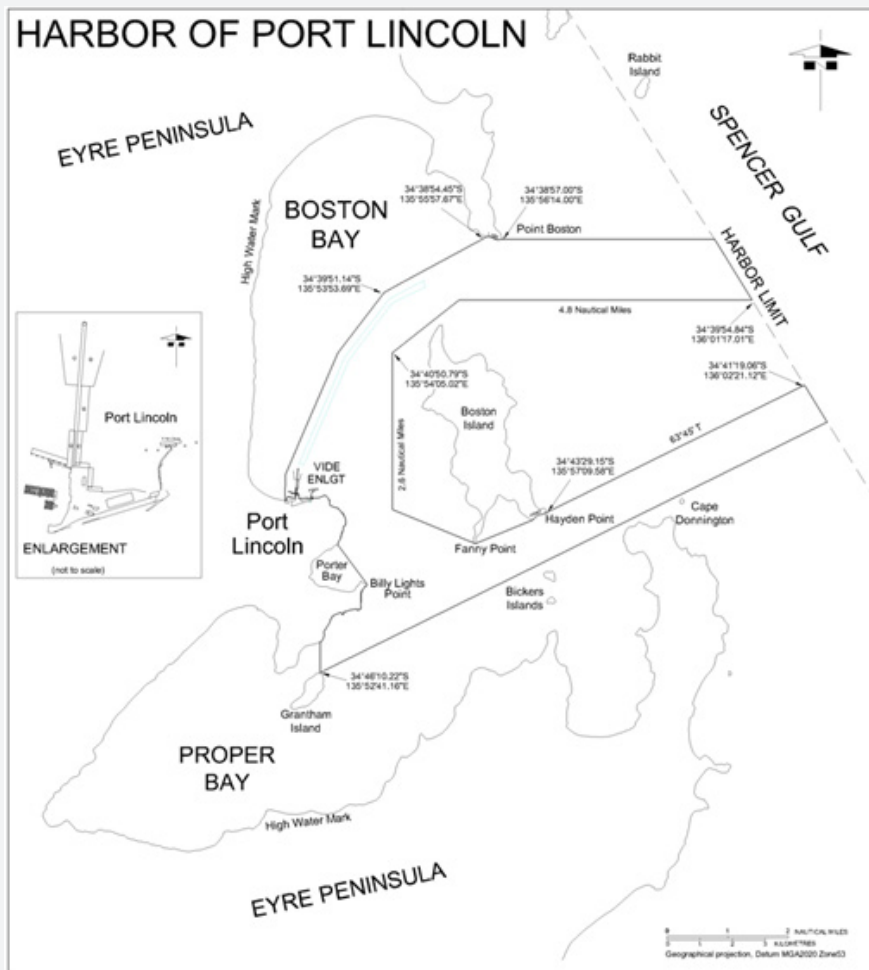


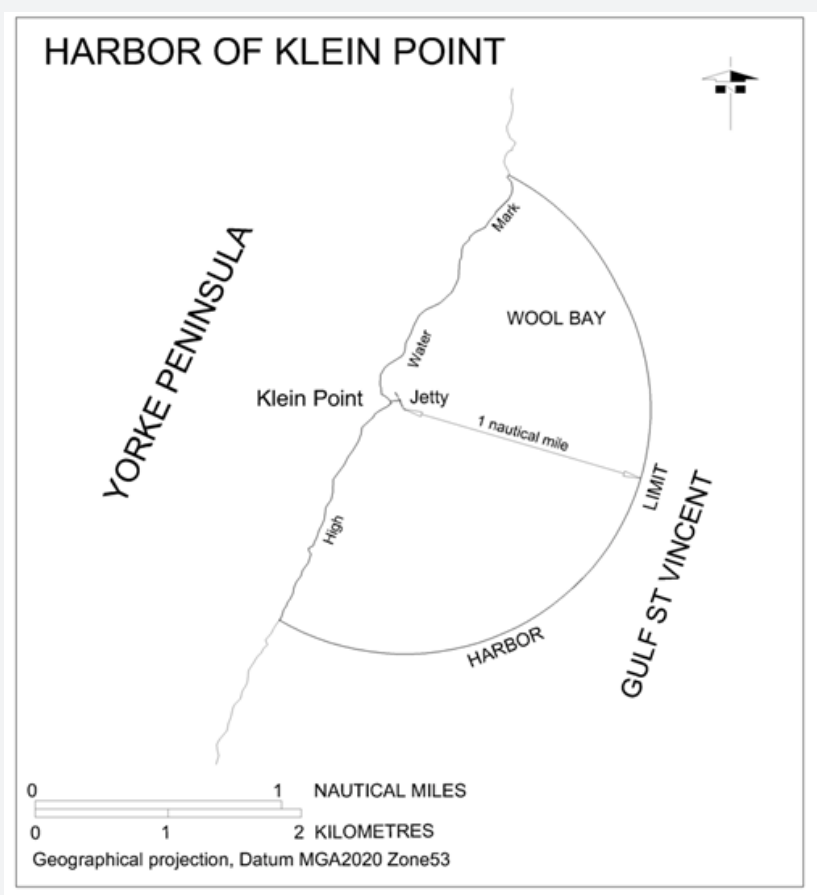
HARBOR OF THEVENARD



HARBOR OF PORT PIRIE







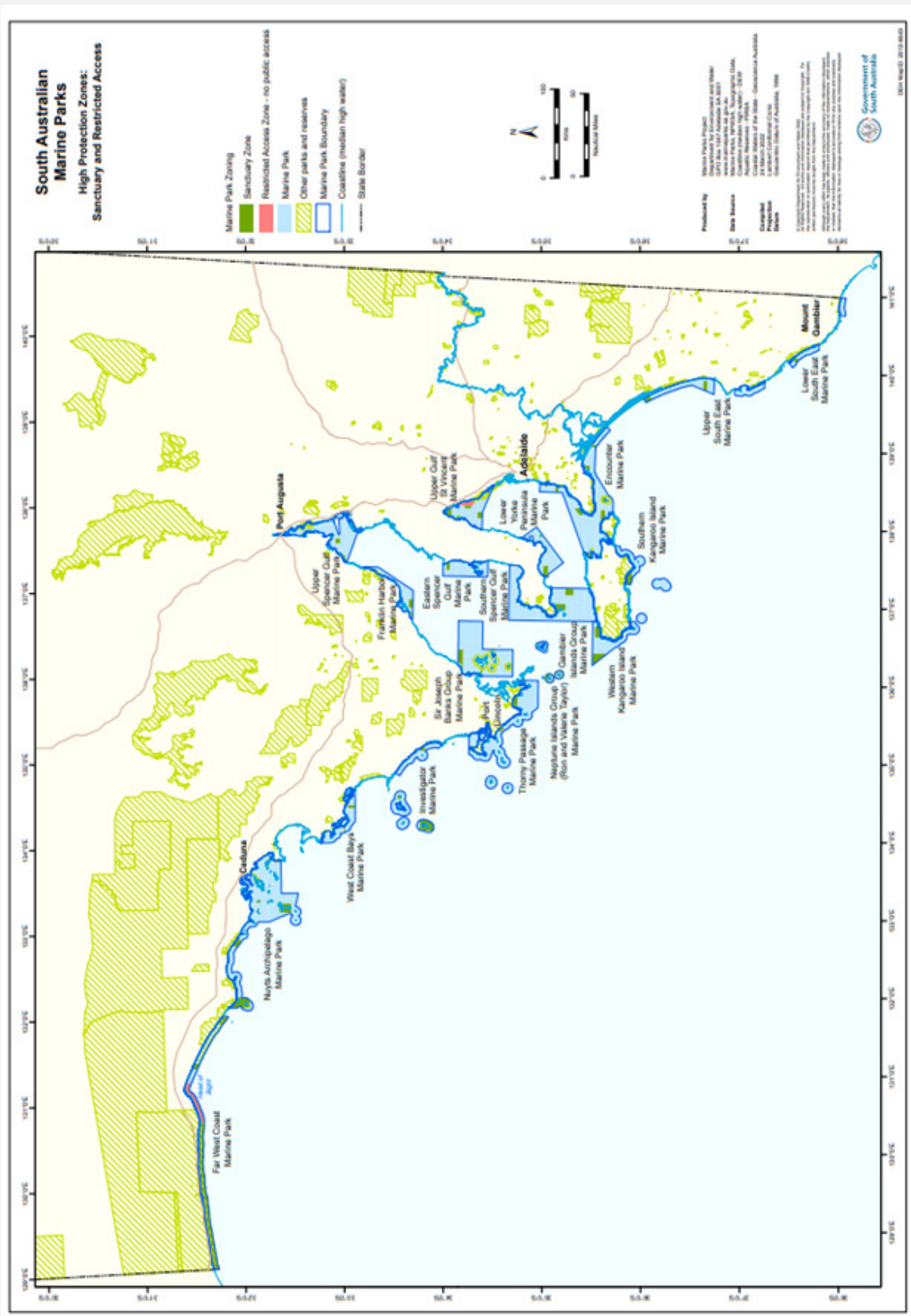
Appendix B: FPH Incident Control Centre Locations

PORT	PORT MANAGER
Port Adelaide FP Marine Operations Centre, Gate C, Berth 2, Level 1 Passenger Terminal, Outer Harbor, SA, 5018	Leon Strydom 0427 531 989
Port Lincoln 1/1 King St, Port Lincoln, SA, 5606	Darryl Montgomerie 0409 025 442
Port Pirie Port Pirie Harbour, Port Pirie, SA, 5540	Paul Beany 0488 926 645
Wallaroo Jetty Road, Wallaroo, SA, 5556	Paul Beany 0488 926 645
Whyalla 36 Roberts Terrace, Whyalla, SA, 5600	Leon Strydom 0427 531 989
Thevenard 131 Thevenard Road, Ceduna, SA, 5690	Andrew Wilkins 0419 868 113
Port Giles and Klein Point As-required basis	Paul Beany 0488 926 645

Appendix B: FPH Incident Control Centre Locations

CONTACT	BUSINESS PHONE	MOBILE	EMAIL
VTIS/Marine Operations Centre	(08) 8447 0902 (24/7) (08) 8447 0903		portops-adl@flindersports.com.au
FP Security	(08) 8447 0921 (08) 8447 0907	0466 028 397	secctr@flindersports.com.au
General Manager Flinders Ports	(08) 8447 0622	0407 396 618	
Manager Port Operations	(08) 7325 2829	0427 531 989	
Marine Services Manager	(08) 8440 9002	0406 978 145	
FPH Reception (Head Office)	(08) 8447 0611		
Port Operations Manager, Port Lincoln	(08) 8682 3633	0409 025 442	
Port Operations Manager Port Pirie, Port Giles, Wallaroo	(08) 8823 2026	0488 926 645	
Port Operations Manager Thevenard	(08) 8625 2617	0419 868 113	
Port Operations Manager Whyalla	(08) 8644 1560	0458 805 198	
General Manager FACT/FWD	(08) 8248 9342	0419 306 559	
EPA SA Pollution hotline	(08) 8204 2004	1800 623 445 (non-metropolitan callers)	
AMSA Rescue Coordination Centre		1800 641 792 (24/7)	
SA Police/Ambulance/Fire	000	Local police station or Police Communications Call Centre on 131 444	
Dept. of Planning, Transport and Infrastructure (SAMSCAP) Duty Officer/s	(08) 8260 0202		
Director Maritime Service and SMPC	(08) 7109 7209	0434 365 379	
Manager Maritime Safety and Compliance	(08) 8260 0027	0488 105 230	
Unit Manager Boating Safety	(08) 8260 0021	0481 908 749	

Appendix D: A map of SA Marine Parks



Document Control Information

IMT	ROLE
Document Owner	FPH Group Sustainability Manager
Title	FPH Oil Spill Contingency Plan
Description	This plan outlines the arrangement for FPH in responding to a Level 1 marine oil spill pollution incident (as defined by the NATPLAN)
Author	FPH Environment Business Partner
Reviewer (FPH)	Manager Port Operations
Approver (FPH)	General Manager Flinders Ports
Reviewer (DIT)	Manager, Marine Safety and Compliance
Date Approved	



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Flinders Port Holdings acknowledges the Traditional Owners of the land and waterways on which we operate, and pays respect to Elders past, present and emerging.