

GALLAGHER
MARINE SYSTEMS

FOCUS TRAINING SEMINAR

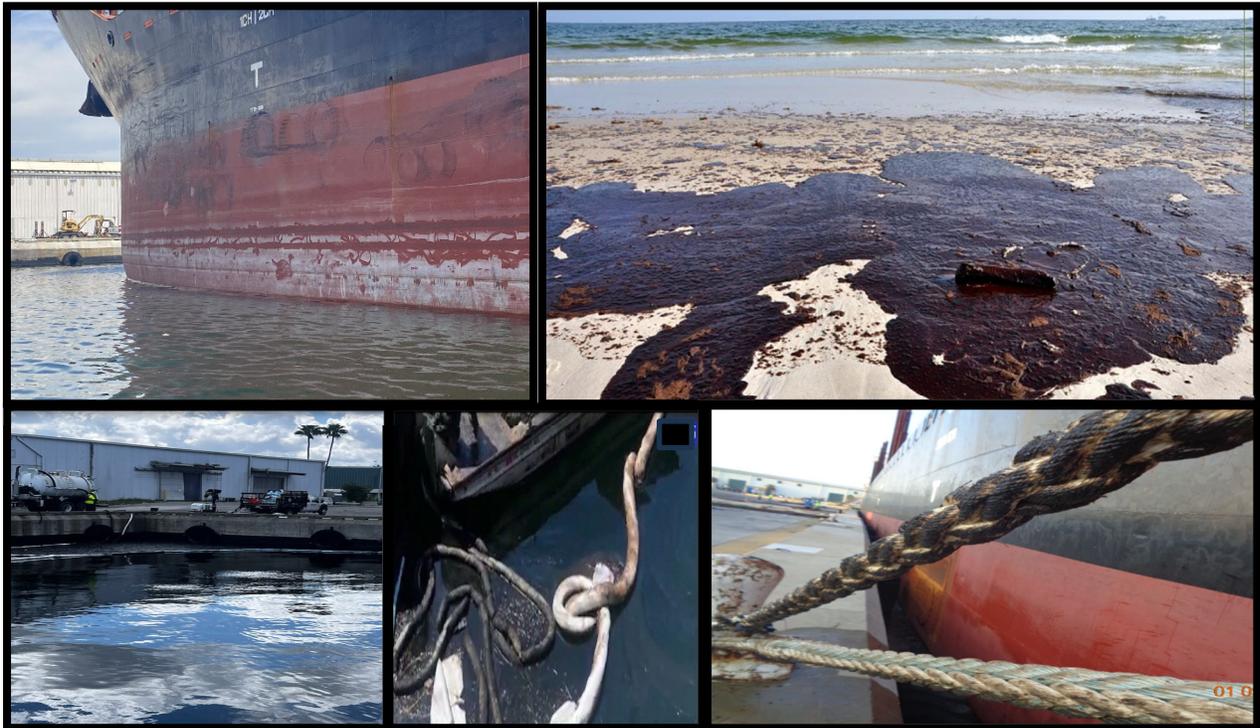
2025 Annual Exercise Accreditation Report

As per Title 14 of the California Code of Regulations and/or USCG PREP Guidelines, this report serves as proof that the outlined objectives have been achieved fulfilling the annual exercise accreditation.

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Fairmont Shipping Singapore TABLE TOP EXERCISE ACCREDITATION REPORT



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SECTION ONE: EXECUTIVE SUMMARY

Introduction:

The National Preparedness for Response Exercise Program (PREP) was jointly developed by the four federal agencies having jurisdiction for oil-spill response preparedness and the oil production and transportation industry as required by the Oil Pollution Act of 1990. The intent of PREP is to improve the readiness of a geographic area as a whole to respond to a major oil spill.

Gallagher Marine Systems (GMS) conducted an Incident Management Team Worst Case Discharge (WCD) Table Top Exercise designed to meet the California Code of Regulations (Title 14, Division 1, Subdivision 4, Chapter 3, Subchapter 3, and Section 820.01) and/or USCG PREP Guidelines. As per these regulations, your company is required to participate in the annual Incident Management Team Table Top Exercise.

Exercise Description:

FTS participants went through each objective and discussed various issues, concerns and protocols which would be involved with such an event. The GMS facilitator reviewed one scenario that included, but not limited to, ICS form overview, response protocol, and expectations of federal and state agencies. Upon arrival at the FTS, attendees formally signed-in as participants in the exercise. This serves as a record of their participation as per 2016 PREP and California guidelines. Upon conclusion, participants receive an accreditation package which includes a certificate of training.

Exercise Scenario:

The scenario this year was based on an incident that took place in Unalaska Island, AK in Western Alaska; involving a Vessel that was unable to maintain positive speed & course due to inclement weather causing the vessel to deviate into Area To Be Avoided (ATBA) to seek shelter. Lessons learned, Federal and State requirements were discussed, and incident specific issues were reviewed during this exercise case study.

Exercise Goals:

1. Personnel Training

- a. Enhance response posture through ICS overview in a seminar environment.
- b. Continued training of response personnel.
- c. Evaluation of response and area plans.
- d. Test, Train and Educate Planholders.

2. Regulatory Credit

- a. Ensure that the FTS meets the credit requirements for the Preparedness for Response Exercise Program IMT TTX.
- b. Obtain credit for the Worse Case Discharge Scenario.

3. Evaluating Plans

- a. Evaluate the CA Contingency Plan and/or Vessel Response Plan (VRP) for oil spills.
- b. Evaluate the Strategies outlined in the Geographic Response Areas (GRAs) or Environmental Sensitive Index (ESI).
- c. Evaluate the Area Contingency Plan (ACP.)

Plan Components:

The following Response/Contingency Plans were exercised:

- ✓ Area Contingency Plan (OPA 90)
- ✓ Geographic Response Areas (Section 9800 of ACP)
- ✓ Fairmont Shipping Singapore CA Contingency Plan and/or Vessel Response Plan.

Exercise Locations:

This FTS was conducted by Gallagher Marine Systems in Xiamen, China where participants from Fairmont Shipping Singapore participated.

Participating Agencies and Organizations:

The following agencies and organizations participated in the exercise:

- ✓ Fairmont Shipping Singapore
- ✓ Gallagher Marine Systems, LLC

Target Plan Core Components:

Within the Vessel Response Plan, there are 15 core components that are described in the National Preparedness for Response Exercise Program (PREP). All components and sub-categories must be exercised over a three-year period. These components within the plan are not titled, nor are there major chapters singling them out in a more obvious fashion. They are, however, contained within the text and diagrams that make up the whole plan. These plan core components will be exercised within a three-year cycle through a series of exercises conducted by the ship, its operators, and the Incident Management Team identified in the plan.

- | | |
|-------------------------------|---------------------------|
| 1. Notifications | 9. Disposal |
| 2. Staff Mobilization | 10. Communications |
| 3. Response Management | 11. Transportation |
| 4. Source Control | 12. Personnel Support |
| 5. Assessment | 13. Equipment Maintenance |
| 6. Containment | 14. Procurement |
| 7. Mitigation | 15. Documentation |
| 8. Protection | |

During this year's FTS, each above, bolded objective set forth was addressed. Some of these components may have additional sub-components listed within. For the purposes of this report, each main component has been achieved along with its sub-component. This FTS Evaluation Package provides an in-depth overview of how each objective was exercised, achieved, and those actions taken by the GMS IMT/SMT.

The State of California OSPR has created their own objectives based off PREP objectives and the Incident Command System (ICS). The PREP objectives listed above (**bolded**) were exercised and achieved in this Incident Management Team Exercise; however, for the purpose of this report, the objectives will be referenced as they are also listed under the State of California OSPR guidelines.

The following California objectives were tested and achieved in 2025:

- 1. Notifications**
- 2. Staff Mobilization**
- 3. Incident Command System**
- 7.2 Assessment**
- 7.5 Protective Strategies**
- 9. Logistics Section**

GMS maintains records of these exercises along with documentation that displays all objectives that have been achieved.

1. **Notifications** – Test the notifications procedures identified in the Area Contingency Plan and the associated Responsible Party Response Plan.

As outlined in the plan, notifications are required when there is a potential or actual release of oil and/or hazardous material into a navigable waterway of the United States. In this year's TTX, an oil spill occurred that required the Master to activate the plan; by contacting the vessel's Qualified Individual (QI.) Once the notification was received by the QI, the QI made actual notifications based on the *Incident Notification Decision Tree* (page 2-2 of the NTVRP). The following are the agencies' that were notified:

- a. OSRO: National Response Corporation and/ or Marine Spill Response Corporation
- b. US Coast Guard National Response Center
- c. US Coast Guard, Sector Western Alaska
- d. State agency: Alaska Division of Spill Prevention and Response
- e. Local P&I Correspondent

Once all notifications were completed, the QI QI passed the above information to both the Master and Crisis Team. It is expected that the Planholder is making notifications as per the following list in the *Incident Notification Decision Tree*.

Ship Operator/Manager Notifications

Operator Notices
(When necessary/applicable and in their/required preferred order of precedence):

1. Flag State
2. Charterer
3. Owner
4. P&I Club
(Home Office)
5. Owner's U.S.
Legal Advisor
6. Classification Society
7. SMFF Provider*
8. Hull & Machinery Insurer
(as necessary)
9. Public Relations Firm

When the vessel does not notify the QI of an incident, and the QI receives notification via a third party, the QI will contact the vessel and/or planholder to confirm incident details.

✓ **Plan Component No. 1 – Achieved**

2. Staff Mobilization - Demonstrate the ability of the response organization identified in the response plan being executed.

The GMS Incident Management Team (IMT) was mobilized to the spill.

✓ ***Plan Component No. 2 – Achieved***

3. Response Management – Ability to operate within the response management system described in the plan.

The GMS IMT established an Incident Command Post and coordinated response activities within the framework of the Incident Command System (ICS), with the U.S. Coast Guard as the Federal On-Scene Coordinator, Alaska Department of Environmental Conservation (AK DEC) as the State On-Scene Coordinator, and Gallagher Marine Systems as Incident Commander. These three organizations form the Unified Command.

✓ ***Plan Component No. 3 – Achieved***

5. Assessment – Demonstrate the ability of the response organization to provide an initial assessment of the discharge or potential discharge and provide continuing assessments of the effectiveness of the tactical planning.

The Unified Command coordinates response activities to identify, contain and secure potential spill sources. OSRO is deployed to maximize oil recovery and aggressively respond to the spill and minimize impacts. Unified Command ensures stakeholders and general public are kept informed of ongoing actions.

✓ ***Plan Component No. 5 – Achieved***

8. Protection - Demonstrate the ability of the response organization to protect the environmentally and economically sensitive areas identified in the RCP and the respective industry response plan.

Protective booming is deployed to environmentally sensitive sites identified in the Alaska Regional Contingency Plan (RCP). The RCP is utilized to determine response priorities.

✓ ***Plan Component No. 8 – Achieved***

11. Transportation - Demonstrate the ability to provide effective multimode transportation, both for execution of the discharge and support functions.

The Logistic Section can book flights, rental cars and other transportation for themselves and associate members. Further, in addition to commercial air transportation means, the GMS Logistics Section has sourced various charter services for air, land and water transportation are used for all responders.

✓ ***Plan Component No. 11 – Achieved***

Objectives of the Exercise:

Exercise the Incident Management Team, as established in the response plan, in a review of:

a) Knowledge of the Response Plan

As per regulations, the VRP was activated when the vessel called the Qualified Individual. The Vessel Response Plan used was a real response plan for a ship that trades to the USA. As a result of the incident presented in this exercise, the QI announced they received the call and stated the facts of the scenario. The IMT was able then to access the vessel particulars and schematic drawings, as well as structure their team into the shore-based organization depicted in Chapter 4 of the VRP and the California Vessel Response Plan. For specific responses for an area, the Area Contingency Plan (ACP) was used to determine resources for environmental, economic, and political concerns. The use of a Common Operating Picture (COP) was critical for spatial information that derives much of its visual data from the ACP.

✓ ***Objective was successfully completed.***

b) Proper Notifications

As outlined in the Plan, the Qualified Individual made all the proper notifications as a result of the incident. Notifications were made in respect to the geographical location of the vessel and were made to the local, state, and federal level.

All notifications were made and/or confirmed by the Qualified Individual and were passed to the Incident Management Team. Updated notifications would be provided if and when the spill amount changes.

✓ ***Objective was successfully completed.***

c) Communications System

Primary forms of communication that were utilized during the incident included phone, radio, and e-mail. All verbal reports were passed from party to party to keep the situation updated as much as possible to real time events. A network-based ICS system was utilized by all IMT members. ICS forms were accessible and viewed from each IMT member on the same network while being able to edit the same form.

✓ ***Objective was successfully completed.***

d) Incident Management Team's ability to access contracted Oil Spill Removal Organizations

While making initial notifications, the Qualified Individual made verbal contact with the contracted OSRO as listed in the plan. At the time of initial contact, the OSRO was able to provide a list of all available resources that could respond to the incident site. Based on the severity of the incident and input from the Qualified Individual, the Incident Management Team, the USCG, the SOSC, and local authorities, the OSRO was directed to deploy the necessary resources to contain and recover all oil that was discharged.

✓ ***Objective was successfully completed.***

e) Incident Management Team's ability to coordinate spill response with On-Scene Coordinator, State and applicable agencies

During the initial stages of the response, the Qualified Individual made verbal contact with both the Federal On-Scene Coordinator (USCG) and State On-Scene Coordinator (State Agency). Subsequent phone calls were made to ensure that all parties were updated on all actions being taken and actions to be performed. It was during these calls that individual parties expressed their concerns, and coordinated with the Incident Management Team to ensure that these concerns were addressed.

✓ ***Objective was successfully completed.***

f) Incident Management Team's ability to access sensitive site and resource information in the Area Contingency Plan

At the time of the activation of the VRP, the Incident Management Team also consulted the appropriate local Area Contingency Plan (ACP) to access all information pertaining to sensitive site and resource information. The QI/IMT reviewed and utilized the Geographic Response Plan (GRP) in the early minutes of the exercise, which proved to be a huge time advantage when locating sensitive sites. These included the Environmental Sensitive Indexes (ESI) as well as booming strategies to protect those areas deemed to be environmental and/or economically sensitive.

✓ ***Objective was successfully completed.***



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2025 CERTIFICATE OF ATTENDANCE

Presented to

Fairmont Shipping Singapore

By participating in the annually required Incident Management Team Table Top Exercise, credit was obtained during the Focus Training Seminar held in Xiamen, China on September 23rd, 2025. This exercise was facilitated by Gallagher Marine Systems in accordance with the Title 14 of the California Code of Regulations and/or U.S. Coast Guard's PREP Guidelines set forth for vessels who are required to maintain a Response Plan under 33 CFR 155.

September 23rd, 2025

A handwritten signature in black ink, appearing to read "Kevin S. Perry".

Kevin S. Perry

Vice President – Emergency Management

A handwritten signature in black ink, appearing to read "Johnathan M. Griffin".

Johnathan M. Griffin

Senior Manager – Emergency Preparedness