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Chapter 8 – Emergency Preparedness

References: [ISM Code] *International Safety Management Code* (2018)

1. Introduction

1.1 Regulatory Backdrop:

The ISM Code intends that we

- 1) identify potential shipboard emergencies,
- 2) establish procedures to respond to them, and
- 3) perform drills to prepare for our emergency actions.

In developing these measures, we are to ensure that we can respond at any time to hazards, accidents, and emergencies involving our vessels.

1.2 Our Objective:

In all emergencies our objective is the protection and preservation of human life and health, followed by protection of the environment, and then minimization of asset damage. By continually practicing a set of drills our objective is to maintain proper preparedness for industry-common shipboard emergencies. The types of emergencies we selected for drills are based on our assessment of risk and regulations.

1.3 Definitions:

Allision: when a moving vessel strikes a stationary object, such as a bridge, pier, dock, or anchored ship (a collision occurs when two moving vessels strike each other).

Drill: a practicable training exercise or simulation to test and improve crew emergency response capabilities and familiarity with life-saving equipment.

EPIRB: Emergency Position-Indicating Radio Beacon - portable, battery-powered distress transmitter used to alert search and rescue services during a life-threatening emergency.

Free Surface Effect - when liquids in partially filled tanks or flooded spaces shift as the vessel rolls that can increase the risk of capsizing.

IMO: International Maritime Organization – the UN specialized agency responsible for safety, security, and environmental performance of international shipping.

ISPS Code: International Ship and Port Facility Security Code – set of mandatory IMO measures to enhance ship and port security.

MEDEVAC: Medical Evacuation – emergency transport of injured or ill person to medical facilities.

MOB: Man Overboard – an emergency wherein a person has fallen into the water at sea.

Muster Station: a designated location on the vessel where all personnel gather during an emergency. Its primary purpose is to conduct headcounts, ensure everyone is accounted for, and keep people out of harm's way.

NTVRP: Non-Tank Vessel Response Plan – required plan for oil spill response in U.S. waters.

SART: Search and Rescue Transponder - safety device used to locate ships or individuals in distress by emitting a radar signal.

SOPEP: Shipboard Oil Pollution Emergency Plan – IMO-mandated plan for responding to oil spills.

SSAS: Ship Security Alert System – a covert alert system mandated by the ISPS Code to silently notify shore authorities of security threats.

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Station Bill: document posted in crew quarters and conspicuous places on the vessel that lists the Muster Station and specific emergency duties for each member of the crew.

VMS: Vessel Management System - integrated system used for our marine operations, document repository, preventative maintenance system, regulatory compliance and safety documentation, marine personnel management, vessel logs, and performance reports. Our VMS is named *Helm Connect*.

VSP: Vessel Security Plan – document detailing security measures required by the ISPS Code.

2. Policies

2.1 Emergencies:

The Master shall hold ultimate authority and responsibility for the command and control of the vessel and crew during any emergency. In all situations, the crew shall respond immediately in accordance with that vessel's Station Bill and specific duties assigned therein, under the direction of the Master (or the most senior officer in command if the Master is incapacitated).

We have identified these potential emergency situations as those most relevant to our vessel operations (see Section 4 below for our analysis), and as such, those we shall stay prepared for.

- sinking/capsizing
- collision/allision
- fire
- flooding
- foundering/grounding
- security breach (ISPS)
- loss of steering
- man overboard
- emergency need for medical evacuation
- oil/fluid spill (SOPEP/NTVRP)
- emergency need for confined space entry
- emergency need for rescue boat
- complex emergency

2.2 Emergency Response:

We shall develop and maintain a robust set of response procedures for use upon such emergencies. These procedures shall be used in the event of an actual emergency and are distinct from the emergency drills. These emergency response procedures shall be maintained in the VMS.

2.3 Emergency Drills:

We shall maintain a robust set of drills that we regularly practice for each type of emergency. These drills shall reasonably mirror the response actions required during an actual emergency but are limited when compared to an actual response (for example, we do not throw a man overboard to practice that drill). The emergency drill procedures shall be maintained in the VMS.

2.4 Drill Guidelines:

- Unless weather or other issues present an overriding safety concern, drills shall be conducted as if there were an actual emergency, for example: firefighters to dress out, fire pumps to be run, rescue boat to be lowered and run, and emergency contact numbers to be called.
- All crew members on board shall participate in all drills conducted.
- Whenever 25% or more of the crew have changed, a fire and abandon-ship drill shall be conducted within 24 hours or before getting underway.

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- Drills shall also be held before sailing when a vessel enters service for the first time and after major modification to the vessel.
- All drills and exercises, whether conducted or simulated or postponed, shall be logged in official logbook in **red** Ink.
- Actual shipboard emergencies shall be reported to the DPA as soon as possible.

2.5 Drill Frequency:

The following table outlines the minimum frequency for drills and exercises aboard our vessels. These frequencies are written to reflect the strictest regulatory standards our fleet is obligated to meet, as well as best practice in the industry.

Abandon Ship and Fire/Explosion drills have different requirements depending on the vessel's Flag State. The drill frequencies shown in the table reflect the most stringent applicable requirements for our fleet.

Additional drills or exercises may include simulated situations to which the vessel must respond with or without advance warning and may include dead ship, communications failures, or other salient possibilities

Drill / Exercise	Frequency	Recorded in		
		HELM	Logbook	VSP
Abandon Ship	Vanuatu-weekly US-biweekly	✓	✓	
Collision/Allision	Quarterly	✓	✓	
Confined Space	Monthly	✓	✓	
Fire	Vanuatu- weekly US- Within 24 hours of sailing, but not combined with Abandon Ship drill	✓	✓	
Flooding	Quarterly	✓	✓	
Foundering/Grounding	Annually	✓	✓	
ISPS (Security Breach)	Quarterly or after 25% crew change	✓+	✓+	✓
Loss of Steering	Quarterly	✓	✓	
Man Overboard	Monthly	✓	✓	
Rescue Boat	Monthly, but at least Quarterly	✓	✓	
MEDEVAC	Quarterly	✓	✓	
SOPEP/NTVRP (Spill)	Quarterly or per voyage	✓	✓	
Complex Emergency	Annually	✓		

✓+ No details or attachments except in Vessel Security Plan.

2.6 Drill Familiarization:

All personnel sailing aboard our vessels shall be given an orientation during which they are shown the location of the Muster Station, demonstration of the various alarms (fire, abandon ship, general), and the Station Bill describing their roles in an emergency. This familiarization process is detailed in **Chapter 6**.

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3. Responsibilities

3.1 Master:

The Master holds ultimate authority and responsibility for emergency preparedness and response on board the vessel. The Master ensures that all required emergency drills are conducted at the prescribed frequencies, that the crew is thoroughly familiar with their duties under the Station Bills, and that all emergencies are reported promptly to the DPA. Working closely with the Chief Engineer and senior officers, the Master ensures that emergency equipment is maintained in a state of readiness, leads emergency drills and exercises, and verifies that the crew can respond effectively to protect life, the environment, and the vessel in accordance with Company policies.

3.2 DPA:

The DPA serves as the primary shore-based point of contact for all shipboard emergencies and significant drill-related matters. He coordinates the Company's response to emergencies, reviews emergency reports and drill outcomes, and ensures that appropriate follow-up actions are taken. Working with the vessel Masters, Port Captain, and Senior Management, he monitors the overall effectiveness of the Company's emergency preparedness program, identifies trends, drives continual improvement, and ensures that the Company meets its ISM Code obligations regarding emergency preparedness.

3.3 Port Captain:

The Port Captain supports Masters and vessel teams in the effective implementation of our emergency preparedness program across assigned vessels. This includes ensuring that emergency drills are scheduled and conducted in accordance with regulatory and Company requirements, reviewing drill reports, and verifying that appropriate follow-up actions are taken. Working closely with onboard leadership, he monitors the quality and effectiveness of emergency drills, ensures that findings are addressed, and supports the continuous improvement of emergency response capabilities.

3.4 Port Engineer:

The Port Engineer supports the Master and Chief Engineer in maintaining the vessel's emergency equipment and systems in full operational readiness. This includes firefighting systems, damage control equipment, steering gear, pumps, and all other technical systems required for emergency response. Working closely with the Master and onboard engineering team, he ensures that maintenance and testing of emergency equipment are properly carried out, provides technical support during emergency drills, and assists in the resolution of any equipment-related deficiencies identified during drills or actual emergencies.

3.5 Systems Manager:

The Systems Manager is responsible for the effective administration and performance of emergency preparedness workflows and records within the VMS. This includes ensuring that all emergency drills, exercises, and related activities are accurately documented and tracked in the system. Working across the fleet, he provides technical support for the VMS as it relates to emergency preparedness, maintains compliance records, and supports accurate reporting and analysis of drill performance and emergency preparedness data.

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3.6 Operations Director:

The Operations Director provides overall leadership and resources necessary to maintain an effective Company-wide emergency preparedness program. He ensures that policies and procedures in this chapter are kept current and that sufficient resources are allocated for training, drills, and emergency equipment across the fleet. Working with the DPA and Senior Management, he oversees the implementation of the emergency preparedness program and holds shore and vessel management accountable for compliance and continuous improvement of emergency response capabilities.

3.7 Senior Management:

Senior Management sets policy and provides executive oversight and strategic direction for our emergency preparedness program. Senior Management ensures that adequate resources are provided to support effective emergency response capabilities and that emergency preparedness remains a key focus within the SMS. Through vision, leadership, and governance, Senior Management reviews emergency preparedness performance during management review meetings and promotes a strong culture of safety, preparedness, and continual improvement.

4. Emergencies Analysis

Following is an analysis of each potential emergency that is the focus of this chapter. Each of these emergencies has a response procedure and a separate drill procedure in our VMS.

The drill procedures outlined in this section are designed to ensure that the crew members are all thoroughly familiar with their emergency duties, can execute them efficiently as a team, and are fully prepared to protect human life and health, the environment, and the vessel.

4.1 Abandon Ship:

Abandon Ship is the most serious emergency that can occur. ONLY the Master, or the most senior officer if the Master is incapacitated, may give the order to abandon ship. The crew must be fully prepared to evacuate the vessel in a safe, orderly, and rapid manner using survival craft and equipment as practiced in the drill.

Critical Hazards in a Real Emergency:

- Disorder and panic leading to people entering the water unnecessarily or without life jackets.
- Lifeboats or rafts becoming separated or capsizing during launch or in heavy weather.
- Failure to account for all personnel before leaving the vessel.
- Drowning, hypothermia, injury during water entry or by being struck by survival craft.

4.2 Collision/Allision:

Collisions, allisions, or hull damage represent a significant threat to the safety of the vessel, crew, and environment. All such incidents are to be reported to the DPA immediately. The Master must ensure that actions are taken in accordance with the Station Bill to protect human life and health, prevent or minimize environmental impact, and limit further damage to the vessel.

Critical Hazards in a Real Emergency:

- Rapid uncontrolled flooding and loss of stability due to free surface effect.
- Structural failure leading to progressive collapse or capsizing.
- Secondary fire or explosion.
- Personnel trapped below decks or in damaged compartments.

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4.3 Fire:

Each vessel is equipped with a variety of firefighting equipment. Through training and drills, all crew are to be familiar with their assigned duties and expected actions during a fire or explosion. The primary objectives are the protection of life, prevention of fire spread, and containment to the area of origin.

Critical Hazards in a Real Emergency:

- Rapid fire spread, flashover, or backdraft.
- Toxic smoke and gases that cause incapacitation before burns occur.
- Being trapped or disoriented in smoke-filled spaces.
- Re-ignition after the fire appears extinguished.
- Structural collapse or explosion.

4.4 Flooding:

Each vessel will carry a damage control kit with plugs, patches, fasteners, and tools. Upon discovering a flooding situation, the crew must take immediate action to assess, contain, and control the ingress of water while maintaining vessel stability and safety.

Critical Hazards in a Real Emergency:

- Rapid loss of vessel stability due to the free surface effect as water shifts in partially flooded spaces or tanks.
- Progressive and uncontrolled flooding through hull breaches, open doors/hatches, or downflooding points, leading to loss of vessel buoyancy.
- Personnel becoming trapped in isolated compartments as water levels rise rapidly.
- Electrical shock hazards, short circuits, and failure of critical systems (propulsion, steering, pumps) in flooded areas.

4.5 Foundering/Grounding:

Foundering or grounding is a serious emergency that can rapidly endanger the crew, the environment, and the vessel. The Master and Chief Engineer should immediately coordinate to assess damage, evaluate stability, and develop a refloating plan, with particular attention to any survey gear attached to the hull. The DPA should be updated as soon as practical under the circumstances.

Critical Hazards in a Real Emergency:

- Rapid capsizing or loss of stability after grounding.
- Structural breach that allows uncontrolled flooding.
- Survey gear entanglement creating additional hazards during refloating attempts.
- Loss of propulsion and steering compounding the situation in heavy weather or traffic.

4.6 Security Breach (ISPS):

ISPS Code security drills contain security-sensitive information. While their occurrence is recorded in the vessel compliance program records and the ship's log, no details or attachments should be included anywhere except where specified by the VSP. All ISPS Code security drills are to be conducted and reported in accordance with the VSP. All ISPS security drills, exercises, concerns, or incidents must be reported immediately to the Chief Security Officer at CSO@tdi-bi.com.

Critical Hazards in a Real Emergency:

- Armed or violent intruders.
- Hostage situations, sabotage, or theft.
- Communication blackouts or compromised systems.
- Crew being caught in crossfire or unable to reach muster station.

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4.7 Loss of Steering:

Loss of steering is a serious emergency that can rapidly compromise vessel maneuverability and safety. Recovery procedures vary by vessel and are addressed in vessel-specific SOPs. The Master is to ensure that immediate actions are taken in accordance with the Station Bill. The DPA should be updated as soon as practical under the circumstances.

Critical Hazards in a Real Emergency:

- Collision with other vessels, fixed objects, or the shoreline.
- Grounding in narrow channels or confined waters.
- Loss of control in heavy weather or high traffic density.
- Secondary flooding or structural damage from impact.

4.8 Man Overboard:

We have two primary methods for rescuing a person who has fallen overboard: (1) maneuvering the vessel to recover the person or (2) launching a rescue boat to recover the person. The approach to be used depends on the vessel, weather, and sea conditions. Regardless of method, the priority is to maintain visual contact with the person in the water and effect recovery as quickly and safely as possible. **Ensure that any propellers are NOT turning when the rescue boat or vessel is alongside the person in the water.**

Critical Hazards in a Real Emergency:

- Losing visual contact with the person in the water, especially at night or in poor visibility.
- Hypothermia and drowning before recovery can be accomplished.
- Injury to the person in the water or rescue crew during recovery from propellers, swinging boat, or heavy weather.
- Additional personnel falling overboard during the rescue attempt.

4.9 MEDEVAC:

Many projects have a project specific MEDEVAC plan required and approved by the client. All medical issues should be reported to the HSE Manager at HSE@tdi-bi.com. We strongly recommend that at the beginning of each major project or when starting work in a new geographic area that a MEDEVAC plan be developed and a corresponding drill be held by the HSE Officer on board. The MEDEVAC drill form is included in the VMS.

Critical Hazards in a Real Emergency:

- Patient deterioration or death during transfer.
- Weather-related risks during helicopter or boat transfer, especially at night or in marginal conditions.
- Improper patient handling that causes further injury.
- Communication failure with the receiving medical facility or transfer team.

4.10 Spill (SOPEP/NTVRP):

Oil pollution incidents represent a serious environmental risk. Each vessel must maintain a vessel-specific SOPEP or NTVRP and conduct regular drills. The DPA should be updated as soon as practical under the circumstances in the event of an actual or narrowly avoided pollution incident.

Critical Hazards in a Real Emergency:

- Fire or explosion from spilled flammable product.
- Personnel exposure to toxic or hazardous materials.
- Rapid spread of pollution due to weather, current, or failed/improper containment.
- Secondary incidents (slips, trips, falls, equipment failure) while responding in oily conditions.

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4.11 Confined Space:

Confined space entry and rescue operations are among the most hazardous tasks performed aboard our vessels. Confined Space drills must be conducted monthly. These drills are to ensure crew proficiency in hazard awareness and identification, safe entry procedures, atmospheric testing, and rescue techniques. The DPA should be updated as soon as practical under the circumstances in the event of an actual incident.

Critical Hazards in a Real Emergency (Highest Risk Drill):

- Immediate-danger-to-life-or-health (IDLH) atmospheres that cause immediate incapacitation or rapid death.
- Engulfment, entrapment, or being overcome by toxic gases.
- Intended rescuers that turn into additional fatalities (most confined space deaths are would-be rescuers).
- Failure to properly isolate energy sources or test the atmosphere before entry.

4.12 Rescue Boat:

Each vessel equipped with a rescue boat should conduct rescue boat drills.

The rescue boat is to be launched with its designated crew, operated in the water, and recovered using the davit. This should be carried out once a month when feasible, with an absolute minimum requirement of once every three months.

These drills may be conducted independently or in conjunction with other drills (such as Man Overboard). Records of each rescue boat launch, including date, crew participation, and any issues encountered, must be maintained in the VMS (Helm).

Critical Hazards in a Real Emergency:

- Failure of the davit or launch/recovery system during actual use.
- Injury to crew during launching or recovery in heavy weather.
- Loss of the rescue boat or crew due to improper operation or equipment failure.
- Inability to recover the boat quickly, leaving personnel at risk.

4.13 Complex Emergency:

A Complex Emergency Response drill should be conducted annually to evaluate the vessel's overall emergency preparedness and the integration of multiple procedures under realistic conditions. This integrated exercise simulates a complex or multi-faceted emergency scenario that may involve several simultaneous or sequential events (such as fire combined with flooding, collision, or security incident). The drill tests the true command and control under the Master's direction, crew coordination, internal and external communications (including notification of the DPA), decision-making under pressure, and the practical application of the Station Bill.

Critical Hazards in a Real Emergency:

- Task saturation and loss of situational awareness under high stress with multiple simultaneous events.
- Breakdown in command, control, and internal/external communications.
- Conflicting priorities that lead to critical tasks being overlooked.
- Cascading failures where one emergency rapidly triggers additional emergencies.

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