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Comments on the draft revised HELCOM Response Manual

General comments

The newly revised manual is vastly more user friendly, it is more streamlined and it facilitates cooperation between response on shore and at sea. Combining the volumes contributes to a harmonisation of the working processes and operational procedures at sea and on shore. Furthermore, the shortening of the Manual and reduced level of details makes it more useful and, for the Swedish context, better fulfils its purposes.

The purpose of the Manual has been discussed over several years in the Response Group, for example when the EWG SHORE group developed the Volume III, one of the main discussions was to identify the different needs among the Contracting Parties regarding the shore aspects. It was noted that the national organisational and legal structures differs vastly between nations, and they also tend to change rather frequently¹. The EWG SHORE agreed that volume III should try and meet all national needs as far as possible, both as an operational guideline as well as a support for its strategic development. This new, combined Manual for sea and shore should similarly also aim to fulfil all the different purposes, for both sea and shore response.

In order to avoid collisions or duplication with national or EU frameworks it is important that the Manual is kept rather general, describing intentions and giving general direction rather than detailed management. A less detailed Manual also requires less frequent and extensive revisions. The Manual is adopted on Commission level and has a legal implication, as it is referred to by the Helsinki Convention Annex VII.

Action requested

The Meeting is invited to discuss the following subjects:

1. To avoid, as far as possible, to differentiate between sea and shore in the Manual and to have the ambition to create general processes that facilitate cooperation between the sea and shore preparedness and response.
2. Chapter 8. FRAMEWORK FOR EXERCISES. Sweden argues that the Manual should outline the general direction and “framework” rather than the specifics it presently contains. Most of the current text should be lifted out of the Manual and included as working material for the proposed task to develop

¹ Mapping of Institutional Architecture for Protection from Oil Spills in the Baltic Sea Region
<https://rib.msb.se/filer/pdf/27959.pdf>

the HELCOM Response Exercise Plan (HREP). The chapter should function as a framework and include:

- a. Reference to the HELSINKI Convention, Annex VI, regulation 10 (legal requirements)
 - b. Purpose of exercise activities in HELCOM (general needs)
 - c. Brief description of the process (clarify how we work with the Convention-Manual-HREP respectively)
 - d. A short description and direction of the HREP (this part can be seen as an ordering of the HREP, and includes general desires/requests that need to be included in the development of the HREP document).
 - e. Add an explanation to the shortened chapter that the exercise framework will be revised together with the development of the new HREP document. (meaning the new chapter will be “provisional” and possibly updated soon again)
3. Avoid duplication. If the proposed new chapter is included about EU Host Nation Support (HNS) there is a need to review chapter 4. “ADMINISTRATIVE AND ORGANISATIONAL SUPPORT OF THE REQUESTING PARTY”. Sweden (MSB) is positive to include the proposed chapter by EU.
 4. Noted duplication. There is no need to mention details again in chapter 4.3 that have already been included in chapter 4.1. Chapter 4.1 already covers both sea and shore.
 5. The Introduction chapter. The chapter should be numbered, renamed and included in the Table of Contents. The chapter covers important formalities such as scope, purpose and legal status of the document, and should be reflected in the headline/s. Consider lifting the subtitles into the Table of Contents.

If the chapter 8 is revised as suggested above, there is a need to rewrite the part in “Description of the Contents”: “The different types of response exercises and exercise planning, evaluation and reporting are explained in Chapter 8.”