

Extract from NTS website

NTS challenge on ship-to-ship oil transfers in Moray Firth

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Cromarty Firth Port Authority has applied to the Maritime and Coastguard Agency to carry out the transfers while vessels are anchored at the mouth of the Firth. This would lead to millions of tonnes of crude oil being pumped between vessels in the Firth in order to cut costs and overcome the limitations of existing harbourside facilities.

The National Trust for Scotland, which has over 330,000 members, has submitted a formal objection to the Port Authority's proposals.

The Trust's objection is based on ten key issues which highlight contradictions and uncertainties within the proposals, as well as the potential threat of environmental damage that could result in disastrous consequences for wildlife and the local economy:

- Cromarty Firth Port Authority claims a single ship-to-ship transfer would equate to 180,000 tonnes of oil, which equates to a maximum of 8,640,000 tonnes per annum (on the basis that there are no more than four transfers a month). However, their proposal document (Section 4.1) states that "The frequency of the proposed cargo transfers is not expected to exceed an average of four per calendar month," which suggests that the no guaranteed maximum volume to be transferred in any year.
- Operational guidelines state that "transfer operations must be suspended in wind speeds of over 27 knots" but goes on to say "If mean wind strength exceeds 35 knots, cargo transfer operations shall cease." Both of these statements cannot be true.
- It is also stated in the proposals (Section 5.1.1) that "The proposed STS cargo transfers will involve a small uplift from the recent numbers of shipping movements." However, current usage by tankers is around 80 a year. The proposed STS transfer will result in 48 transfers a year or 96 tanker movements. This cannot be described as a "small uplift". The calculation used (5.3.1.1) is invalid as it considers all shipping movements (including tugs). In terms of oil cargo transferred at Nigg Terminal, this has been running at around 1 million tonnes a year, as compared with 8.6 million tonnes in the proposal.
- As well as an eight-fold increase in oil transfers, the proposed transfer site is outwith the Cromarty Firth and therefore much more exposed than the site at Nigg Terminal. It is therefore far more risky in generating a spill than the current practice – perhaps by a factor of about 20.
- It is stated (Section 5.3.1.2) that "The maximum mass of oil that could be spilt in the course of a transfer is 1,000 kg; this would be the quantity of oil spilled from a fractured hose." This is contradicted by the statement "Accidental fire or explosion onboard could cause a tank to be breached" – presumably releasing up to the entire 180,000 tonne complement of the tanker.
- The proposals also described (5.3.1.3) how ballast water exchange carries a severe risk of introducing non-native species. Although new regulations to minimise risks from ballast water are proposed, these are not yet in force.
- Seabirds are very susceptible to oiling and a large spill in the Special Protection Area would have a very significant impact on an internationally important population of seabirds, waders and seaducks.
- The impact of such a spill on sea mammals (seals and dolphins) would also be significant.
- Oil spills would have a major impact on intertidal communities and potentially on commercial shellfisheries.
- The conclusion reached in the proposals (5.3.3.2) that "procedures are in place to prevent the accidental discharge of oil and the risk of a significant impact is considered unlikely. Therefore, no residual effects are predicted" relies on an unrealistic assumption that oil spill response measures will retrieve all oil before any damage has occurred. This is not borne out by experience of oil spills that have taken place in the past.

Richard Luxmoore, the National Trust for Scotland's Senior Nature Conservation Advisor said:

"The proposals affect one of Scotland's most important marine designated areas which provides a habitat for

internationally important populations of seabirds and dolphins.

“If enacted, the risk of oil spills would be massively increased by a growth in ship to ship transfers and a nine-fold increase in oil transport – spillages would threaten huge concentrations of seabirds and pods of bottlenose dolphins which live in the Moray Firth. Not only are they a source of wonderment, the subject of a university study centre, they attract thousands of visitors each year.

“Oil Spills would also threaten the shoreline with waste oil that would pollute the coast and threaten the quality of life for local communities.

“Our beautiful, unspoilt coasts and communities and their fantastic wildlife are a massive draw to visitors, who come to this wonderful place and nearby attractions such as Hugh Miller’s Birthplace Cottage and Museum, all of which underpin the local economy.

“I do understand the pressures the oil industry is under at present but to threaten such an important area with irretrievable damage for the sake of short-term efficiencies is totally irresponsible.”