

February 05, 2016

Marine Connection Objection to proposed Ship to Ship Oil Transfer Application by the Cromarty Firth Port Authority

Marine Connection are writing in response to an Application for proposed Ship to Ship Oil Transfers by the Cromarty Firth Port Authority as we have concerns that the application has not demonstrated it contains measures to protect one of the most environmentally sensitive sites in the UK.

During these transfers between two ships, approximately two tons of medium grade crude and other oils are transferred per second – with a 40 second shut down time, should a spillage occur, up to 80 tons of oil could escape into the sea before shut down is successful. A tanker holds 180,000 TONS of oil. The transfer takes 24 hours, in an area where the sea conditions are very changeable. If a tanker was to drift off anchor in rough conditions, it could easily hit the rocks, or run aground on a sandbank, losing its entire cargo. The CFPA application continually models a 1 ton spill – however even that amount would take out a large area of sea/beach.

This type of ship-to-ship transfer may have been carried out within the port for many years without incident however that is within the port itself, not in an open area of the Firth with the highest density of bottlenose dolphins in the north that frequent the very area that, at any given point, 40% of the dolphin population can be found within. Furthermore, the transfer sites are within a protected SAC, as defined in the European Union's Habitats Directive, and any oil spill, no matter how slight, could affect wildlife in the area for decades.

As an example, following the Exxon Valdez oil disaster in Prince William Sound in 1989 in Alaska, despite clean-up efforts oil is still to be found on the regions beaches, under rocks and between boulders. Two pods of orcas (killer whales) affected by the Exxon Valdez spill lost 40 percent of their numbers, and the population has still not fully recovered. Also following the BP oil spill off the coast of Louisiana in 2010, researchers tracked 10 pregnant dolphins for nearly four years and found that only two of the dolphins gave birth to calves.

As a dolphin and whale conservation charity, our obvious focus is the impact this would most certainly have on the Moray Firth dolphin population which is already vulnerable, and as such, deserve further protection – not added threats to their future welfare and survival. However, we must not overlook the threats to other marine life such as seals, seabirds and fish and it is not only a wildlife issue - if these transfers are allowed to proceed, the practice could have untold impact on the area in general.

The Black Isle and surrounding area is a popular tourist destination with an abundance of areas of natural beauty which are home to a vast variety of wildlife, some of which is endangered. Famous also for fish and seafood, any damage to the sea bed, pollution of our native waters or our natural environment from either an oil spill, noxious gasses or other emissions could badly effect tourism and also the livelihood of the local population.

We hope you will consider our comments before making a final decision on this proposal. We urge that in the interests of the local population, the beauty of our environment and the wildlife therein and the tourism this generates, that the Application by Cromarty Firth Port Authority, be refused.



Liz Sandeman (Co-founder)