

Cromarty Firth Port Authority
Cromarty Firth Ship-To-Ship Oil Transfer Licence
Application

P1946_RN3783_REV_1
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Objection from Tain Community Council

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Tain Community Council discussed this matter at their meeting on 25th January 2016 and wish to object to this licence application.

Details of our objections are attached on the following pages.



David W. McAllister
For Tain Community Council
5th February 2016

Tain Community Council wish to object on the following grounds

1 Rationale

At no point in the Non-technical Summary (N-tS) or the full application document is the rationale for this development outlined. What is the **need** for such a transfer facility?

2 Location

a Affected area

Throughout the documents it is stated that “proposed cargo transfers will take place afloat within Cromarty Firth harbour waters”. While this is technically correct, the location outwith the Sutors of Cromarty takes industrial process into an area so far unaffected by such, other than the movement of ships.

The proposed area is surrounded by highly important designated areas for conservation, the nearest SSSI being less than 2 Km from one of the anchorages. It falls within the Moray Firth Special Area of Conservation (SAC) which has been designated due to the importance of the bottle-nosed dolphin populations and the sub-tidal sand bars. This designation is discussed in “Appendix A – Environmental Baseline” but is ignored in the N-tS and therefor has not been made obvious to the general reader of the report.

b Visual impact

A direct consequence of 2a will be a considerable increase in the visual impact of the Port of Cromarty Firth (PoCF) activities within an area of considerable tourist and conservation importance. On at least 48 days a year two large vessels and their attendant tugs will be visible from Tarbatness in the north to Chanonry point in the south-west and right along the south coast of the Moray Firth. These will be part of a 14.8% increase in traffic to and from the PoCF (not 13% as stated in the N-tS).

As the proposed activity is in an area which has not been used in the past and which is geographically and visually separate from the main port these are not “taking place within an existing operational port” as stated in Table 5.2. The impacts should not be “considered to be insignificant”.

In an area where tourism is a major employer and major money earner this is not acceptable.

3 Environmental impacts

a Oil spillage

While the chances of oil spillage are relatively low this must be considered in the context of the estimated 8,640,000 tonnes transferred per annum. The spillage modeling shown in Appendix B gives brief snapshots based on high spring tides and normal wind conditions. At low tides a considerably greater area of shore is exposed and oil spillage is an ongoing event not just the initial beaching event at one location. Much of the shores closest to the transfer sites is inaccessible cliff with associated rough water.

This factor means that the area contaminated by an event could be considerably greater than that shown in the “initial beaching” scenarios shown. Also the report does not appear to cover the temporal effects:

- How long would contamination persist?
- What would be the long term effects on the shoreline?
- What would be the long term effects of sunken oil or tar deposited on the sea bed in relation to both the organisms living there and the local inshore fisheries?
- How would the shown scenarios differ in the event of spillage in gale or storm conditions?

While we accept that “the likelihood of such an oil spill occurring is considered to be very low”, we cannot agree with the frequent statements that the effects are “not considered to be significant.” (see many of the conclusions in Table 5-2).

We also note that at no point does the report consider the extremely unlikely but potentially catastrophic consequences of a collision between vessels laden with oil manoeuvring in relatively confined areas.

The “Oil Spill Contingency Plan - Revision 7” provided in Appendix – D appears to be designed for the calm waters within the Sutors and there is no indication of how this would apply at the STS sites when a NE gales is blowing and a large swell is running in all the way from the Norwegian sea.

We consider the oil spillage scenarios and contingency plan to be totally inadequate.

b Ballast water contamination of the environment

The assessment of ballast water impacts is very superficial and appears to have no baseline studies to support it. Appedix B states that “Despite the IMFM replicating the physical processes and movements of the bodies of water, it is not able to replicate the complex and dynamic biological systems present.” It is in these complex dynamic systems that the harmful effects of non-native organisms (NNOs) would have the largest consequences. How would the food chain for fish, birds, cetaceans and fishermen be affected by regular exposure to non-native organisms? How might this build up in relation to regular long term exposure?

Table 5-2 states that the effects on the local economy of a non-native species

establishing “is considered to be significant” and as such we consider that it is not acceptable.

c Transfer methodology

The safety and mitigations of procedure outlined in the report seem to depend on set procedures being followed by ships’ captains and a PoCF observer. In these routine transfers spillage can occur due to equipment failings (e.g. pumps, hoses, hose connections, valves etc.) and/or human error. Even if noticed straight away (which is probably unlikely) a considerable quantity of oil would be released before the transfer process could be stopped, especially as stopping the transfer is step 5 in the STS Superintendent’s instructions (Appendix 4).

d Hydrocarbon release

Release of VOCs is discussed in some detail however the statement that “When planning a proposed cargo transfer, operators should include consideration of emissions of volatile organic compounds (VOCs), should seek to mitigate against such emissions and should consider the use of VOC recovery systems where available” as the only VOC recovery systems are within the Sutors they are not available to vessels moored at the proposed site. The heaviest of the VOC compounds are heavier than air and will therefore be deposited at the sea surface where they will have the greatest effect on marine organisms, especially cetaceans and seabirds.

The hydrocarbon burden of the air/water system will be further affected by the VOC release and also by exhaust emissions from the vessels and their pumping systems. To humans the most obvious effect of all these emissions are the pungent odours from VOCs but the long term exposure and possible health effects are considerably more worrying.

e Other effects

Moored vessels will be a source of sewage, litter, light engine oils etc. The long-term consequences of the build-up of these on shore environments and the seabed is not discussed.

4 Environmental impacts – consequences

a Present environment and activities

i Cetaceans

The proposed locations are in an area used on an almost daily basis by the Moray Firth bottle-nosed dolphin population and also visited by harbour porpoise and minke whale, and at times other cetaceans.

The bottle-nosed dolphin group forms part of the population which constitute a major dolphin watching tourist industry based on Chanonry Point, Inverness and Cromarty.

ii Birds

On the surrounding cliffs there are small but significant populations of guillemot, razorbill, fulmar, shag and cormorant, which have been subject to a long term study by R.L.Swann. Associated with these are gull nesting groups and breeding peregrine falcons.

The entrance to the Cromarty Firth through the Sutors is used by wintering flocks of eider and long-tailed ducks.

iii Fishing

There is a sustainable local fishery based mainly on lobster and crab fishing. In the Dornoch Firth there are extensive mussel beds granted to the then Royal Burgh of Tain by King James IV which are still fished on behalf of the people of Tain by a local company. In a good year this fishery is worth £100,000 to the Tain Common Good Fund. The potential loss of their 500 year old fishery would be catastrophic for the people of Tain.

iv Tourism

The proposed locations are in an area used by local fishing trips and by dolphin watching boats throughout the spring, summer and early autumn. 1 Km diameter restriction zones due to hydrocarbon releases would considerably restrict the movement of tourist and fishing boats along the Rosemarkie to Balintore shores.

b Accumulated long term effects on seabed

The seabed in the vicinity of the STS transfer sites will be subject to chain drag effects of anchors, pump emissions, bilge water, sludge and "other waste". This will be long term and cumulative and therefore will have a very long term or permanent effect on the food chain with possible significant negative effects on the shellfish, fish, bird and cetacean populations.

c Disturbance

Should this proposal go ahead seabird and cetacean populations would be subjected to a considerable increase in disturbance due to increased vessel traffic,

noise, light at night and increased pollutants on a regular and ongoing basis. The first section of Table 5-2 claims “The magnitude of the effect will be small in scale, duration and size. Disturbance of marine mammals and seabirds is not considered to be significant.”.

We would suggest that the effect would be of considerable significance.

d The human population

The local human population would be affected in many ways:

- Visual impact:
 - large mooring buoys at all times.
 - oil vessels and their tugs on many days each month.
 - increased light pollution at night.

As a greater proportion of transfers are likely to take place in the summer months the visual impact is likely to be greatest at the peak times for tourism.
- Pungent odours from VOCs.
- Some ongoing negative impact on income due to restrictions on use of the area and reduced tourist input to the area both in boating and B&Bs.
- Considerable negative impacts on income in the event of an oil spill.
- Exposure to PM₁₀ and PM₂₅ carcinogens from spills during storms.
- Contamination of seafood affecting both the local consumption and industries based on shellfish
- Negative impacts on birds and cetaceans affecting both local recreation and the tourist industry.
- Negative impacts on the shoreline affecting both local recreation and the tourist industry.
- Negative impacts on fishing and aquaculture.