



Local action for a sustainable and healthy planet

Stoneybank
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Mr. S. Woznicki
Maritime and Coastguard Agency

7th February 2016

Dear Mr Woznicki,

Cromarty Firth Port Authority Licence Application – Ship-to-ship Transfers

I write on behalf of Transition Black Isle to object to the application by Cromarty Firth Port Authority (“CFPA”) for a licence for ship-to-ship oil transfers.

Transition Black Isle is a charity with members throughout the Black Isle, whose aim is to promote an active transition to a society which is less dependent on fossil fuels, and lives which are less resource-intensive. In our view the CFPA application represents a retrograde step from the use of the jetty at Nigg, bringing increased environmental risks, a loss of amenity to local residents, and financial loss to those currently running businesses in the tourism and related sectors.

Environmental risks

As is shown by Figures 6.1 and 6.2 of the application, the proposed transfer sites are almost entirely surrounded by designated nature conservation sites of national and international significance. In our view, the application should therefore only be allowed if it demonstrates no increase in the risk to wildlife, and ideally a reduced risk from the status quo. We believe this is not the case, and we understand the applicant has acknowledged this in discussions with Cromarty Community Council. The key issues, in our view, are:

- Ballast water discharge – the application refers to the BWM Convention, but this has not yet been ratified, and will not come into operation until 12 months after it has been ratified. It is unclear how the convention will be enforced even after it has been ratified. Highland Council has no policy on ballast water discharge. In these circumstances we consider the risk of introducing invasive non-native species, or other pollutants, from discharged ballast water is unacceptable, particularly as there is an existing ballast water treatment plant available at Nigg jetty.

- Oil leaks – the risk of oil leaks will inevitably be higher from ship-to-ship transfers at anchor than in the more sheltered location at Nigg jetty. We accept that leaks from the transfer process are unlikely, but we believe the consequences of a leak have been very significantly under-stated in the application. Specifically, we believe the maximum leak is much greater than the 1 tonne anticipated, and the risks to wildlife on a flooding tide are greater than at high tide, as modelled.
- Other possible impacts – it seems likely that wildlife, especially cetaceans, will be affected by noise, collisions with ships, and VOC emissions arising from these transfers. These risks will be increased if the licence is granted, due to the higher volume of ship traffic and the location of anchor points in an area of high cetacean activity.

Economic impacts

The location of the proposed transfers means there will be an inevitable adverse impact on dolphin tours currently undertaken from Cromarty. Cromarty also has a small boats harbour, and the local hotels and other businesses benefit from yachtsmen and kayakers whose enjoyment will be greatly reduced by the proposed transfers. The experience of land-based holidaymakers will also be affected by noise, smell and the sight of the ships. In the event of serious pollution from ballast water or oil, the economic impact will be felt more widely throughout the Inner Moray Firth.

Amenity impacts

The same issues of noise, smell and visual impact which will spoil the visitor experience will be felt by Cromarty residents on a more regular basis.

Conclusion

The CFPA proposal has no benefits for Black Isle residents, nor for the local environment, but it brings increased risk of severe damage to both. Even setting aside the risk of oil leaks, some level of damage is inevitable, and in our view unacceptable. Following the COP21 talks in Paris, it is now clear that all nations need to be charting a course to a fossil-fuel-free future. This is therefore no time for a race to the bottom in standards of environmental protection, just to facilitate the last gasp of the oil industry.

Yours sincerely,

Martin Sherring
Convenor

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cc. Emma Langley, Intertek; Torquill Macleod, Port of Cromarty Firth