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FAO: Department for Transport (DfT)

6th March 2011

MARINET would wish to formally object to the proposed Merchant Shipping (Ship to Ship Transfers) Regulations 2010 overturn permitting the ship-to-ship tanker transfer of oil offshore to the coast of Suffolk that is/was due to come into force in April. Last November, then Secretary of State for Transport Lord Adonis moved to cease transfers in UK waters. Despite previous Environmental Minister John Gummer (also MP for Suffolk Coastal) having pushed for an outright ban on this controversial practice, Shipping Minister Mike Penning has announced that the transfer of oil between ships would still be allowed in UK waters off the north Suffolk coast.

MARINET would wish to point out the following reasons for our objection to this statement of intent.

1. Already Existing Threats

Benacre, Covehithe, Southwold, Walberswick, Dunwich, Thorpeness and Aldeburgh, still semi-pristine parts of the Suffolk coastline, are already impacted, threatened and reduced in their area, their public appeal and their aesthetic value by the existing nuclear power stations and threatened escalation at Sizewell. The areas beaches and foreshore are being lost to erosion due to the reduction of the coastal defence allowance and by the governments ready provision of licences for offshore aggregate dredging, this at a time of worsening weather and escalating sea rise, coupled with East Anglian sinkage.

As if these threat to Suffolk's coastline are not enough already, we are now faced by the additions of risking collision, spill and serious pollution, the ship to ship transfer of oil off Southwold constituting and placing additional penalty not only to the immediately adjacent Suffolk coast but to the entirety of the East Anglian Coastline.

1. The Local Economy Impact

(a) Holiday Trade

Tourist Income, upon which the Suffolk Coast is highly dependent, is already threatened by the aforesaid existing threats. Tourism in Suffolk provides 30,000 jobs and annual revenue of £1.75 Billion the majority of which emanates from the holiday trade. To further increase deterrence to this essential holiday trade is quite unacceptable. Potential visitors will not plan for

holidays nor even day visits when such threats exists, now further added to by the spectre of oil pollution.

(b) Local Retail Trade

Shipping personnel visiting ports and harbours provide for the use of local labour and round the year income for the catering establishments and hotels, an essential to vitally needed employment in the non-summer period. This source of income will prove to be reduced if offshore facilities are permitted. The use and employment provided by local port facilities can be fully avoided by offshore transfer, so further depleting local income.

2. Impact on Fuel and Transport Costs

(a) By determining the level of supply permitted and by awaiting price rise by having a large reserve standing by, a free reign is given to the oil companies in elevating their profitable income from fuel. Further, the government taxation on fuel increases with the price, so giving further costs to the public and industry at a time of severe austerity. All transported costs of people and goods will rise in price due to this increased costing at a time of severely reduced public income.

3. Containment, Supervision and Safety

(a) In a pitching sea transfer of oil cargo always threatens a serious risk of spillage. Such can be minimised or even stopped by the use of an oil boom within the confines of a dock or harbour, but such effective containment is not feasible in the open sea. Furthermore, the closure of the Great Yarmouth Coastguard will exacerbate the danger. The nearest Coastguard presence in future will be at Aberdeen or Southampton if these additional ridiculous plans are enacted.

(b) MARINET (and RAYNET) are not of the opinion that there exists provision for an adequate response in the event of a major disaster such an oil spill, particularly as government has proposed that it intends to dispose of its fleet of ETVs- purpose built vessels that were introduced following the Braer disaster, this provision with the specific intention of dealing with oil tanker spills and/or fires.

(c) The tankers involved in the operation, contrary to considered international opinion to permit only double hulled vessels for oil transportation, are single layer hulls, thus very vulnerable to leakage, spillage and collision. Already in the past three weeks one such collision between a fishing boat the 'Chloe Page' and the Singapore Prisco owned 797 ft Zaliv Vostok has resulted when on the morning of Tuesday 10th February when the tanker ran down and crashed into the local fishing boat within the allocated tanker 'parking zone'. Fortunately on this occasion there was no rupture so consequently no oil pollution.

(d) The oil in question is Russian Grade 4 Heavy Crude which is the most difficult to break down and disperse.

4. Threat to Wildlife, the ecosystem and the Visual Environment

(a) The Suffolk Coast is internationally recognised as being prime in the British landscape. It is designated as an Area of Outstanding Natural Beauty (AONB) and contains numerous Sites of Special Scientific Interest. The National Trust and the RSPB both have nationally important sites in the area at Minsmere, Orford Ness and Dunwich. The future existence of these are menaced by oil transfer at sea with its associate risk.

(b) The Marine Management Organisation (MMO) gives Sole Bay as one of the first areas in the UK to be planned for sustainable development and an important part of their brief is to "protect sensitive coastal environments".

(c) Despite the serious damage to the feeding and spawning beds brought about by the intensive dredging of aggregate offshore, much of Suffolk, including the threatened area, still offers a fishery, particularly for sole. Shellfish beds, Oysters and Mussels of the locality are also threatened by oil spillage. Ideally a Marine Reserve could be sited here rather than a further threat imposed.

5. Ecological and Environmental Survey

(a) To my knowledge, other than EIA's created for and on behalf of the dredging companies concerning impact upon the sea bed and shoreline, no environmental risk assessment (IRA) or environmental impact assessment (EIA) has been carried out in the area most likely to be impacted. Yet nevertheless, the DfT demands that environmental risk assessments must be carried out at any harbour wishing to apply for licence for STS transfers in the future (Written responses to Review, December 2010) . An anomaly and a failure to communicate is apparent here.

6. Comparators

(a) Recent research by Marine Scientist Professor Samantha Joye of the University of Georgia reported to the American Association for the Advancement of Science Conference in Washington gave her study findings made using the Alvin submersible to explore the benthos, the bottom-most layer of the water, around the well head fracture that came about on the 21st February 2011, when the Deepwater Horizon spilt much oil into the Gulf of Mexico.

Her research found that contrary to the assurances given by BP, the polluter, who only examined the surface and shoreline, then saying that full recovery would result by the end of 2012, in fact all filter-feeding organisms, invertebrate worms, corals, sea fans and detritus feeders such as sea cucumbers and brittle stars were killed and around the sea floor, and that the full effects of the spill may not be seen for ten more years yet..

(b) The FHC 2004 Falmouth Harbour study provides statistics on past oil spill incidents. The numbers of Incidents/Accidents in STS transfers between 1995 and 2003 averaged 3.6 per year, 2.8 per 1000 operations. With over 300

operations per year already taking place off Southwold we can expect an Incident/Accident every year. The document further summarizes the number of oil spills in range 7-700 tonnes (medium) worldwide as 28 per year in the 1990s: over 700 tonnes (large) the average was about 8 per year in the 1990s.

The total oil spilled amounted to about 100,000 tonnes per year in the 1990s. The largest spills in UK waters were Torrey Canyon (1967), Amoco Cadiz (1978), Braer (Shetland Islands 1993) and Sea Empress (Milford Haven 1996), these ranging from 72,000 to 223,000 tonnes of oil.

(c) The FF 2005 Firth of Forth study estimate the oil spills risk for STS transfers in Firth of Forth for 2002-2004 as being:

Small spills (<7 tonnes): 0.14 per year (i.e. one every 7 years)
Medium spills (7-700 tonnes): 0.02 per year (i.e. one every 50 years)
Large spills (>700 tonnes): 0.004 per year (i.e. one every 250 years)

The deployment of Southwold as a sole off shore area for SATS oil transfer would combine in one place the transfer activities of Firth of Forth, Falmouth Bay and Southwold itself. Thus, the risk to the Southwold area is increased by a factor of three. We may thus expect a small spill every other year, a medium spill every 17 years and a 30% chance of a major spill over a twenty-five year period. This is unacceptable and unnecessary.

7. Policy Reversal

(a) Following earlier consultation, the previous Government, with the full agreement of the opposition, gave out that STS oil transfers would be allowed to continue in licensed harbours but on grounds of safety for the environment be moved beyond UK territorial waters at sea. This accepted agreement has been reversed with warning and without further consultation or consideration. This too is unacceptable and unnecessary.

8. Contingency Plans

(a) MARINET feels that contingency plans for a major oil spill are not in place. The 2010 exercise simulating a major oil spill event last year dealt with by involving the Community Emergency Group, the CEPO's and my own RAYNET group, etc. failed miserably, and thus gives no reason for confidence in the future. Until and unless all preventative measures are in place, adequate supervision is provided and full clear up procedures instituted, oil transfer must be provided in safeguarded and fully equipped harbours only.

9. Shipping Density and increased hazard

(a) Between 2008 and 2010 the number of STS transfers in Sole Bay increased twenty-fold. Over the same period the general shipping density has increased also, added to by dredgers, wind turbine traffic and port traffic. The probability of further collisions and major oil releases to the sea are consequently now magnified. A further safety concern is the size of the ships using the Sole Bay waters. These include some of the world's largest

vessels (VLCCs) of up to 320,000 tonnes. Such are two and a half times bigger than the Torrey Canyon and 4 times bigger than the Braer.

Manoeuvrability and 'braking' is severely compromised and restricted with these massive ships, as evidenced by the recent collision on Tuesday 10th February, and the fact that three inter-tanker collisions occurred in 2009 within the space of just six weeks. The Shipping Insurance bulletin "Risk Alert " said the frequency of these collisions had been "cause for concern".

10. Summary

In MARINETs view, in the absence of any formal risk assessment and in the light of the evidence provided above it would be foolhardy, reckless and irresponsible to proceed with STS transfer at sea anywhere, the Suffolk Coast in particular. In the interest of the marine environment, the coastal condition and on both national and local economic terms the misguided change of plan must be abandoned and a return to safe standards reinstated.

Pat Gowen - MARINET

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