

**PROPOSED ASSOCIATED BRITISH PORTS (EASTERN RO-RO TERMINAL)  
DEVELOPMENT CONSENT ORDER**

**DEADLINE 2**

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Annex 1 to Written Representations on behalf of Captain Firman, Harbour Master, Humber

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## Immingham Eastern Ro-Ro Terminal – Risk ID Consultation

Dear Mr Oliver Peat,

I am writing to respond to the Risk ID consultation for the above project in my position of Harbour Master, Humber responsible for the operational management of ABP Humber Estuary Services in its role as Statutory Harbour Authority for parts of the Humber Estuary and Competent Harbour Authority providing Pilotage for the entire Humber Pilotage Area.

I have reviewed the output of the one plus two day workshops which I attended at Immingham and Scunthorpe and would submit the following points for your consideration.

**Operational risks** - In regards to operational risks a number of the activities and scenarios have close parallels with other ongoing activities which are covered under the Harbour's own Risk Assessments which are carried out in MARNIS. These risks seem to have been rated consistently higher through the workshop despite being assessed in a very similar way.

I do not see any benefit in questioning each individual score in what was a collaborative process but would make the following representations using occasional specific examples to illustrate the points made.

There were many examples discussed in the Workshop where the "Worst Case Scenario" was in excess of our normal assessment as it assumed a number of unlikely scenarios happening in parallel as "unlikely" (which I believe was more the likelihood of any single event happening) rather than "rare" – Allison with Tanker is an example of this.



In regards to the same risk scenario the "Most Likely Scenario" considers that a low speed contact is possible but goes on to assess the consequence of such an incident as much worse than we would conclude using our usual assessment process.

It is important to point out that our own assessments of both likelihood and consequence are based on the recording of actual similar incidents over decades using incident data and the actual consequences experienced.

**Barge movements** - The risk assessments relating to Barge movements also score highly in comparison to usual risk analysis which allows these vessels to operate with greater operational windows.

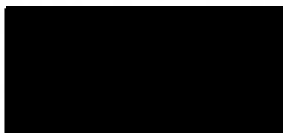
**Risk ID 04** - Specifically relating to operational Risk ID 04 the scenario seems to immediately assess that the trunk-way has been breached and the Risk Scores are commensurately high. The consequences of such an event are indeed significant and this requires further review and consideration of mitigation.

**Construction and Construction/Operational phases** - In regards to the Risk Assessments for both the Construction and Construction/Operational phases, then again some of the scores again rate higher than I would expect. The activities relating to a construction event would be tightly managed and only exist as an additional risk for the period of the works. At the workshop some of these risks seemed to be considered over a much longer project length and this seems to be reflected in some of the assessment scores where specific measures could remove risks completely (e.g vessels anchored in "F" anchorage).

**Future Control** - There was some debate over the workshops as to what was considered as an "embedded" control and what was a "future" control. For clarity it is our view that any new specific actions, training or procedures relating to the project would be new and therefore "future" even if they were following current best practice from other areas.

I hope the above assists the consultation process and we look forward to our ongoing participation in any future process.

Yours sincerley,



Capt. A Firman

**HARBOUR MASTER HUMBER**