

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

DEADLINE 3

Response on behalf of the Harbour Master, Humber

to

Deadline 2 Submissions by

Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Limited

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1. Introduction

1.1. This is a written response made on behalf of the Harbour Master, Humber (HMH) in respect of documents submitted at Deadline 2 by Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Trustee Limited (“IOTT”).

1.2. The documents addressed in this submission are:

1.2.1. IOTT - written representation

1.2.2. IOTT - navigational risk assessment

2. IOTT - written representation

2.1. Paragraph 3 – Navigation and shipping

2.1.1. Of paragraph Para 3.2 (f), HMH considers that IOTT’s criticism of the simulations is misplaced. It is agreed that simulations do not completely represent reality, but they do have merit both as a learning tool and as a tool to inform the assessment process, The benefit of doing them is that it is better to fail and learn in the simulated environment than on the river. In the view of HMH, they are fit for the purposes of assessing navigational scenarios and informing assessment of risk as long as their limitations are understood. While there are elements of simulation that can appear sterile or less challenging, there are a number of reasons why it can be more challenging to operate in the simulated environment than in real life. In the simulations, the master or pilot will have a number of different scenarios to consider rather than a single plan and is dropped straight into the critical part of the manoeuvre with little time to assess the surroundings and, importantly, given the human element, is having every action critiqued by a large group of observers. The simulator itself, while advanced, is limited in the amount of situational awareness it can provide both technically and from a reality perspective. In real life, the master or pilot has the support of bridge team members and, on a well-run vessel, each experienced crew member has their own clear responsibility. HES has been using simulation for training, assessment and development purposes for almost 20 years and it is our experience that the conditions of simulation have value in assessing scenarios, taking into account their positive and negative aspects.

2.2. Paragraph 7 – response to NS. 1.14

2.2.1. HMH notes that the question is about the consequences of “aborting” a berthing manoeuvre, which is when the vessel changes its plan in order to avoid something going wrong. He considers it unlikely that an abort would be carried out in a manner where a RO/RO vessel would end up being pushed towards the Finger Pier by the ebb tide as, in that case, the vessel would be head west and not be required to turn around in the same way as a vessel for the Finger Pier. In practice, a vessel should always abort from a point of safety.

2.2.2. IOTT’s response appears to suggest a situation in which a vessel loses control and that no planning, preventative or remedial action is taken by it.

2.2.3. HMH does not accept that a Ro-Ro abort would necessarily have the effect described on any IOTT vessels. In practice, a tanker is likely to be prioritised over a Ro-Ro vessel in any event.

3. IOTT - navigational risk assessment and appendices

- 3.1.1. HMH has read the additional Navigational Risk Assessments produced on behalf of IOTT and DFDS. It seems to him that in broad terms, despite the technical differences in approach and methodology, the important elements of hazard identification and ranking of risk are broadly similar with both each other and that of the ABP NRA, in that each ranks very similar highest risks and identifies similar potential control measures.
- 3.1.2. It seems to HMH that the main difference of significance is that the two shadow NRAs require the implementation of the Impact Protection Measures and relocation of the finger pier in order to reach ALARP rather than identifying them as potential future controls. There are a number of other potential controls which are identified in all three NRAs.
- 3.1.3. HMH does not intend to comment on detail on either shadow NRA, but there are some areas of the IOTT assessment where he would like to set the record straight:
- 3.1.4. With regard to paragraph 24 of the NRA, HMH wishes to point out that IOTT is a regular attendee at the stakeholder liaison meetings chaired by HES for operators on the Humber which are encouraged by the Port Management Safety Code, and at which matters affecting the Port of Immingham and HES are discussed as well as operational and other issues of concern to individual operators. Minutes of those meetings are circulated to IOTT.
- 3.1.5. HMH is also concerned about the way that session three of the simulations – at which he was present, as were IOTT and DFDS, is described in paragraphs 88 to 97 of the Nash Maritime NRA. The largely negative description does not reflect the collaborative approach or verbal positive feedback during the sessions. As an independent party who understood the concerns raised by other parties, HMH effectively took the lead in shaping the session with the clear aim of ensuring that all concerns were dealt with satisfactorily. Everyone present was encouraged to provide input to scenarios and have their say. At the end of the session, all present confirmed that they were satisfied with the process they had witnessed and did not need any further runs.
- 3.1.6. With regard to paragraph 91, HMH was simply helping to move the process forward by, entirely properly, pushing the users of the simulator to test the parameters. It is worth noting (i) in relation to paragraph 94 that IOTT provided input into the emergency scenarios and those present discussed being ready with the anchors as a potential additional control to reduce risk and (ii) in relation to paragraph 97 that the Rix Phoenix Captain confirmed that he was comfortable with the possibility of changing his current practice to reflect the new conditions.
- 3.1.7. With regard to paragraphs 103 and 104, **all** pilotage at Immingham is challenging and all pilots are obliged to undergo training and re-training as part of the normal day to day management of navigation on the Humber. Anyone using the new berths will be obliged to undergo appropriate training to use them, and HMH does not consider this to be impractical. HMH has described in his written representations how safety will be managed for IERRT just as it is for the other destinations on the Humber.