

Hoek van Holland, 18 January 2024

Dear Examination authority,

I write on behalf of Stena Line BV (**SLBV**) to provide a response to the Examining Authority's Rule 17 Request, for further information dated 12 January 2024.

In that Rule 17 request, three questions are directed specifically at SLBV, which I address in turn. All of the questions derive from the IOT Operators' comment in paragraph 18 of examination document [REP8-057] which is as follows -

“During the course of the simulations in December a Stena Master refused to continue with the runs as he stated that he would never operate in greater than 20 knots of wind or 2.5knots of tide - the run proved to be a failure. The IOT Operators note that there appears to be different operational parameters used between ABP the Applicant and Stena the proposed users of the IERRT facility which have not been set out to enable the ExA or affected parties to consider them. ...”

You have asked us in connection with the operation of the proposed berths to comment on the participation of SLBV's Masters during the course of the December navigational simulations, most particularly:

- 1) *The decision of any Master to discontinue participating in the simulations;*
- 2) *The experience of any such Master of navigating within the Port of Immingham and any other port on the Humber; and*
- 3) *Confirm what operational parameters Stena Line Masters would apply to the use of three proposed berths and in that regard comment on any differences that there might be between the approach of Stena Line and the Applicant.*

Before responding specially to your questions, I should make clear that the information submitted by IOT is simply not correct and my Company, SLBV, finds it extremely worrying that such misleading and inaccurate statement can be allowed to be made in such an important legal process. Quite simply, our Master never stated that he would not operate in conditions greater than 20 knots or 2.5 knots of tide and we find it extraordinary that the IOT Operators could even suggest that such would be the case.

Dealing now with your specific questions -

(1) The decision of any Master to discontinue participating in the simulations;

The run in question was undertaken with the G9 (Delphine) vessel and the scenario simulated was a complete loss of engines, no back-up mechanical support and no anchors – in other words, the so-called “dead ship”. The vessel was, therefore, supported by two tugs. The ExA should note that this what we believe to be entirely unrealistic scenario was simulated at the request of the IOT Operators. I should also point out that there was a peak spring ebb tide (4.5 knots) and a north westerly wind 27.5 knots gusting +/- 5 knots.

This alone underlines the lack of credibility in the IOT Operators' assertion.



It became clear very quickly that the Master could not control the vessel and the vessel would collide with IERRT infrastructure. Before the run was finished the Master left the simulator and went back into the conference room and requested to stop this simulation run because it didn't make sense at all and that he would not continue with this particular simulation. You can always create simulation conditions where you are sure that it is going to fail and when you are then also restricted in the use of the available equipment it becomes very frustrating for a mariner of such extensive experience like SLBV's Masters.

The reason why the Master stated this is, that in full operational control, he would not dock this kind of vessel in these conditions. As mariners they use a rule of thumb that 1 knot of current is equal to 25 knots of wind. In the conditions prevailing during this simulation the wind and current are working together thus meaning that it would represent the same if there is a wind blowing of $27.5 + (4.5 \times 25) = 140$ knots.

No captain or pilot would dock a vessel in these circumstances, especially not the G9 – which I should add is unlike any vessel that SLBV would use at the Immingham Ro-Ro terminal - due to the wind surface of the vessel and the lack of effective stern and bow thrusters' power, because of the 4.5 knots of current. Even in full control with two tugs the Master does not think you can control this vessel. He knows this because he has seen that at Humber Sea Terminal (HST), this vessel, operated by CLdN, didn't dock in environmental conditions which were less than the ones described above. This was combined with his experience as mate/Master of Stena Superferry Stena Britannica and Stena Hollandica class with 7600M3 wind surface. There are circumstances where you simply do not dock a vessel because you cannot control it. In fact, even P&O vessels have had to back out of docking in the past due to weather conditions.

In addition to the above, the statement that we do not operate in conditions greater than 20 knots and 2.5 knots of tide is operational nonsense. At the moment we work with the T-class vessels at current rate to 3.5 knots and wind strengths up to 35 knots.

I should add that the T-class vessels themselves operate with no restrictions at the Port of Killingholme although quite properly those Masters/PEC holders who are not overly familiar with the Killingholme do have to observe sensible restrictions until they have demonstrated their familiarity with arrival and departure operations – which at times, I should add, can be very challenging. The Master who was involved in this particular run and is well-used to the Port of Killingholme operates without restriction.

It should also be noted that the Stena vessels have been tested at HR Wallingford in terms of arrival and departure to and from berths 2 and 5 of the Port of Killingholme to find out what the limits were for these vessels. Operating with 3.5 knots and 35 knots of wind the vessel was still capable of manoeuvring without tugs. This resulted in no restrictions for these vessels. The Masters can then decide if they need tug assistance or not and if so how many tugs they will require. Precisely the same process will be applied for IERRT.

We would finally add that, to correct any implication to the contrary, the Masters participated in the rest of the simulations without any problem.

(2) *The experience of any such Master of navigating within the Port of Immingham and any other port on the Humber;*

Since November 2017 the Master in question has held his PEC for the Port of Killingholme. This Master and a number of other Stena Masters have sailed and manoeuvred on the T class vessel for



some years and have been docking ships at Killingholme on all berths except berth 6 which is not in use.

On the Humber (Ports of Killingholme and Immingham) the Masters, as PEC-holders, have captained the following vessels.

- MV 'Hatche' / MV 'POL Stella'
- MV 'Quezban' / MV 'POL Maris'
- MV 'Stena Nordica'
- MV 'Jutlandia Sea'
- MV 'Fiona Sea'
- MV 'Stena Forerunner'
- MV 'Stena Transporter'
- MV 'Stena Transit'

Stena Masters have also been present during all the simulation runs which have been completed so far for IERRT with the Jingling class, T-class and G9 vessels. They have worked on the simulator with ABP pilots when they dock the vessels at the finger pier to understand how it looks and works with these vessels.

For completeness, many Stena Masters have PECs for The Humber, Harwich, Europort and Hoek van Holland and captain -

- MV 'Stena Hollandica' Route Hoek van Holland – Harwich; LOA 240m Ropax vessels DW 64039 GRT.
- MV Stena Britannica' Route Hoek van Holland – Harwich; LOA 240m Ropax vessels DW 64039 GRT.

(3) Confirm what operational parameters Stena Line Masters would apply to the use of three proposed berths and in that regard comment on any differences that there might be between the approach of Stena Line and the Applicant.

The operational parameters for the new IERRT berth will be in consultation with the port of Immingham Dock Master and the Harbour Master Humber ie both SHAs.

As the ABP Harbour Master Humber has indicated, we anticipate that further simulations, assessments etc., will be required, initially for the Stena T Class and then in due course for any other vessel that we wish to operate from IERRT. That is normal practice as managed across the world by port authorities. We fully recognise that no new Stena vessels will be allowed to operate from the new Immingham Ro-Ro facility until both SHAs are satisfied that the vessels that we wish to use can be operated safely.

Further, for each type of vessel, again is normal practice, we will be required to commence operations with a soft start and then gradually the limitations will reduce. When the imposed limitations will end is difficult to predict as this will be dependent on the experience of the Masters/PEC holders, combined with the tidal and weather conditions.

Reverting to the simulation runs with T-class vessels, I must again emphasise that those runs were conducted under extreme – sometimes unrealistic - conditions and our Masters were still able to dock the T class vessels safely with or without tug assistance. It is the Master's responsibility to consider all conditions including the weather, state of the tide, allocated berth etc. in order to decide if they



can dock with or without tug(s), or in fact if they can dock at all in extreme conditions. Again, this is normal practice.

In light of the above, we see no difference between the approach of Stena Line and the Applicant. We will be a Ro-Ro operator subject to the navigational requirements of the Dock Master and the Harbour Master – as is already the case for our vessel using the Port's Inner Dock.

We trust that above provides the information sought in answer to your questions.

Yours sincerely,

Stena Line BV,



S.M. van der Vlucht,
Senior Manager Port Development & Deputy Trade Director,
Business region North Sea.



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