



The Rt Honourable Louise Haigh MP
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Our ref: AM16/62155.1/MINHI

24 September 2024

Dear Secretary of State

Immingham Eastern RoRo Terminal - Response to ABP Letter

We write with reference to Associated British Ports' ("ABP") application for the proposed Immingham Eastern Ro-Ro Terminal Development ("IERRT") and recent correspondence with the Department for Transport regarding ongoing discussions between ABP and our clients Associated Petroleum Terminals (Immingham) Limited and Humber Oil Terminals Trustee Limited (together the "IOT Operators") regarding the proposed IERRT development.

A meeting has now taken place, on 23 September 2024, at ABP's request and with attendance by IOT Operators' terminal manager, marine superintendent, and operations controller to discuss potential common ground between the parties on mitigation proposals to address the risks identified by the IOT Operators to their terminal arising from the proposed IERRT development.

No specific mitigation proposal was put forward by the Applicant ABP in advance of that meeting and no common ground on mitigation measures was reached during the course of the meeting. The constraints within which any proposal could be brought forward were discussed, and the IOT Operators' understanding remains that physical mitigation proposals that address the risks they have identified, to the acceptable standard (being As Low As Reasonably Practicable – or ALARP), cannot be delivered within the existing DCO development footprint. The IOT Operators also remain of the view that operational or procedural controls (e.g. the use of tugs) will not be able to deliver the required level of risk mitigation, and nothing has been suggested by ABP which has altered that view or alleviated the concerns of the IOT Operators.

The IOT Operators' position on the DCO Application remains as outlined in previous submissions, most recently summarised in their letter responding to the Secretary of State's consultation of 9 May 2024.

Yours sincerely

[REDACTED]

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Classification: Confidential

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