

From: [Alex Minhinick](#)
To: [Immingham Green Energy Terminal](#)
Cc: [REDACTED]
Subject: ISH7 | IOT Operators | Statement in lieu of attendance [Burgess-WORK.FID10771667]
Date: 17 April 2024 18:21:30
Attachments: [image001.png](#)
[image002.png](#)

Dear PINS IGET casework team

My clients the IOT Operators are grateful for the ExA's ongoing consideration of navigation and safety issues relating to the proposed IGET. We understand the IOT Operators have been asked to attend ISH7 to comment on navigational matters in particular.

In relation to marine navigational matters, the IOT Operators are in the course of taking advice from marine consultants, as outlined in their Written Representation [REP1-009]. Whilst that process is ongoing, and to ensure a proportionate use of limited resources, the IOT Operators are not proposing to attend ISH7. However, at this stage, and in respect of agenda item 3(1)(4th bullet) the IOT Operators do not envisage any negative practical navigational effects arising from the 5-knot speed limit being proposed – in principle. The IOT Operators will review the detail of the Applicant's submissions on this agenda item, which will include detail of how that speed limit would operate in practice, and will seek to ensure any comments are submitted to the ExA on the detail of the proposal at the earliest opportunity.

In respect of the IOT Operator's safety concerns, and as the ExA is aware, the IOT Operators and the Applicant (alongside Air Products) have agreed the broad scope of the mitigation which will be required to address those concerns. That is recorded, for example, at 3.9 of the IOT Operator's Written Representation [REP1-109] and the Applicant's response to that WR at page 3 [REP2-009]. The parties are continuing to collaborate to reach a position where the mechanism to deliver that mitigation is secured for the benefit of the IOT Operators. Whilst it has not been possible to reach that position in advance of ISH7, the IOT Operators are hopeful that a mechanism can be secured in the short term future. Once that has occurred, the ExA will be notified.

Whilst the IOT Operators are not intending to appear at ISH7, in the event their concerns regarding safety and major accident hazards are not adequately addressed by the Applicant, or the detailed input on marine navigational matters highlights concerns in that environment, it would be the IOT Operators' intention to update the ExA at the earliest opportunity – likely D3 on 3 May. If concerns do remain or arise, it would be the IOT Operators' suggestion that further ISH(s) should be convened to address those matters during the period reserved in the examination timetable (during the week of 5 July).

I trust this update is helpful to the ExA, and ask that they are made aware of this email in advance of ISH7 to explain my clients' absence from that hearing. To the extent there is any further input required from the IOT Operators in the short term, I would ask that is recorded as an action from ISH7 which can be responded to at D3.

Kind regards

Alex

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