

Consultation Response Form

PART 1 – Information about you

Completion of this section is mandatory as it helps with our analysis of results. A note at the end of this form explains that we may be obliged to release this information if asked to do so.

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Please tick one box from the list below that best describes you/ your company or organisation.

<input type="checkbox"/>	Small to Medium Enterprise (up to 50 employees)
<input type="checkbox"/>	Large Company
<input checked="" type="checkbox"/>	Representative Organisation
<input type="checkbox"/>	Trade Union
<input type="checkbox"/>	Interest Group
<input type="checkbox"/>	Local Government
<input type="checkbox"/>	Central Government
<input type="checkbox"/>	Other Emergency Service (Police/Fire/Ambulance)
<input type="checkbox"/>	Member of MCA Staff
<input type="checkbox"/>	Member of a Coastguard Rescue Service team.
<input type="checkbox"/>	Member of the public
<input type="checkbox"/>	Other (please describe):

If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?

The Outer Hebrides (OHCTG) is an inter-agency group who have come together, to jointly campaign against the proposals brought forward by the Maritime and Coastguard Agency (MCA) for the modernisation of the coastguard service and to bring forward positive alternative proposals to those proposed by the MCA. The Task Group is also campaigning against the decision by the UK Government to withdraw the Emergency Towing Vessels (ETV). Membership of the Task Group includes: the Member of UK Parliament; the

Member of the Scottish Parliament (pre-election); Coastguard representatives; Comhairle nan Eilean Siar (Western Isles Council); Stornoway Port Authority and Western Isles Fishermen's Association.

The OHCTG has met regularly since the announcement of the MCA consultation in order to consult, discuss and develop alternative proposals.

Given the location of the Outer Hebrides on the very periphery of Europe and the UK; the island nature of the community, allied to the high dependence of the local economy on marine activity (fishing, aquaculture, ferries, leisure tourism, etc) the present MCA proposals have been of considerable concern to all sections of the community.

The approach of the OHCTG to this consultation is to provide some overview commentary on the seven questions asked within the consultation and to provide an Appendix document elaborating on these issues and providing an overview in regard to an alternative modernisation proposition. This follows the approach advocated by Mike Penning, the Parliamentary Under-Secretary of State for Transport when he visited Stornoway in March 2011.

If you would like your response or personal details to be treated confidentially please explain why:

The OHCTG is happy for its response to be public.

PART 2 – Questions about the proposals

Question 1 (Chapter 1)

We have set out the changes that would affect the way the Coastguard needs to operate. Are there any other changes and pressures that should be taken into account in our plans for a modernised Coastguard service? Please provide supporting evidence for your comments.

The OHCTG is supportive of the modernisation of the Coastguard service. It is self-evident that services need to renew and modernise to reflect the environment and circumstances in which the service operates. Chapter 1 of the consultation is clear in regard to these changing circumstances – it overviews that our seas are becoming more congested; that ships are getting larger; that our coastline is getting busier and that weather conditions are becoming more extreme. It goes on to state that "...the number of incidents to which the Coastguard has to respond has been rising and is likely to continue to rise".

Against these changing and higher risk circumstances it appears clear to the OHCTG that the present approach is taking us in completely the wrong direction. At a time of increasing maritime risk it appears reckless in the extreme to simultaneously reduce coastguard provision to two main Maritime Operations Centre's (MOC); to withdraw the Emergency Towing Vehicle (ETV) provision; to withdraw the Maritime Incident Response Group (MIRG) and to withdraw Nimrod support. All of these withdrawals are happening against a background of continuing uncertainty in relation to helicopter rescue services.

In the view of the OHCTG the result of these service reductions will be the complete withdrawal of the Outer Hebrides insurance policy against maritime incident and the

creation of unacceptable levels of risk. If these various proposals are implemented they will compromise the safety of shipping and mariners around the UK in general and around the north and west of Scotland in particular.

The OHCTG is seriously concerned in regard to the level of change proposed and whether the totality of impact has been considered. There is a significant amount of change proposed in the marine sector simultaneously, any one of which would be challenging in its own right and would require careful planning and implementation. Implementing these different elements simultaneously represents bad strategic planning and in the view of the OHCTG can only be characterised as being dangerously reckless.

It is a matter of extreme concern to the OHCTG that the MCA's modernization proposals do not take into account the totality of change – this is a serious omission in the consultation document and would appear to represent the worst type of compartmentalisation. It is imperative that any changes to the coastguard service are undertaken in full cognizance of other changes affecting the service's operating environment.

The OHCTG is extremely concerned that appropriate risk assessments have not been undertaken into the modernization proposals. It is of even greater concern that account has not been taken of, or risk assessment undertaken, across the totality of what the MCA and UK Government are proposing. Recognising these failings in relation to risk the OHCTG commissioned detailed independent risk assessment work from respected marine consultancy Eagle Lyon Pope Ltd. This work clearly demonstrates that the majority of risk factors move from either "Low" or "As Low as Reasonably Possible" under the present system to "High" under the MCA proposals. For the OHCTG this is a totally unacceptable position.

The detail in relation to Risk Assessment is outlined in our Appendix document to this response questionnaire.

There is no clear definition in regard to the technology solutions proposed in the consultation document. By definition marine incidents will occur in the remoter parts of the UK, where telecommunications infrastructure will be at its weakest. The consultation document does not take into consideration the reliability of telecommunications links in areas such as the Outer Hebrides. The OHCTG therefore has serious doubts in regard to the proposed technology solution. These concerns are reinforced by a March 2011 report from The Royal Academy of Engineering entitled "Global Navigation Space Systems: Reliance and Vulnerabilities". The report overviews reliance issues and in the Executive Summary states:

"A failure, or loss of signal due to some outside influence, can result in a range of consequences depending on the application...where systems are used in safety of life critical applications, the consequences can be more severe – in some situations, even if operators are well-versed in procedures for a loss of GNSS (Global Navigation Satellite Systems) signals, the number of interlinked systems simultaneously activating alarms can lead to eroded situational awareness of operation in what could well be an emergency situation".

Question 2 (Chapter 2)

We have explained the current Coastguard structure and the potential weakness in that structure in the face of increasing demand. Are there other strengths or weaknesses in the current arrangements that we should be taking into account? Please provide supporting reasons for your comments.

The OHCTG accepts the need for modernization. As in any system or any service weaknesses and vulnerabilities can be detected particularly where little service investment, evolution or change has been evident over an extended period. The need for modernisation is therefore not disputed – what the OHCTG takes issue with is the proposed solution advocated by the MCA. As an area and community that has suffered over the years from the centralization of services, the Hebrides fully understands the negative impact that centralization can bring. The OHCTG does not believe that a centralized “call-centre approach” as advocated through the two MOC-model will deliver service improvement.

Characterising the coastguard service as having limitations because of “...a system which is some forty years old” would appear to be a misrepresentation. It is clear from elements as diverse as staff training through to equipment deployment that the service and its systems have not stood still for forty years. One only has to visit the Stornoway Coastguard Station to understand the first class people and facilities that are available to the service. The removal of that station and its staff would be entirely detrimental.

The OHCTG is also concerned in regard to the statistics presented in relation to geographic spread and times. Presented as “bald statistics” without context these statistics can lead to a distorted understanding of impacts. For example there is a wide variation between incidents – one incident could be a minor “beach-type” incident that is dealt with very quickly; another could be a major shipping incident requiring multiple responses over a number of days. Both are one incident, but the nature and potential severity and residual impacts are of a completely different order of magnitude.

Question 3 (Chapter 3)

Under our proposals we would establish two Maritime Operations Centres handling emergency messages 24 hours a day, supported by a number of sub-centres operating at times of peak demand linked by a national network of radio connections and information sources. In your view, does this provide an appropriate and effective approach to Search and Rescue coordination response? Please provide supporting reasons for your comments.

No – in the OHCTG’s view this is the wrong approach. We do not believe the proposal is appropriate and we do not believe it will prove effective. Our assessment is that the proposals have not been thought through from both a technical and cost basis and as a result their implementation will inevitably lead to serious, detrimental safety and environmental impacts.

Representatives of the OHCTG and our local partners have discussed the proposals in detail with senior MCA staff. Through-out these discussions the MCA have been unable to credibly articulate the benefits arising from their proposals and as a result there is no confidence in their approach or in their proposals. Their proposals do not carry the confidence of the public of the Outer Hebrides; local coastguard staff; front-line volunteers; the fishing community; the Local Authority or the Outer Hebrides Community Planning Partnership.

The community of the Outer Hebrides believes that the proposals, if implemented, will in effect dismantle both the local and the wider UK insurance policy against serious incidents.

The OHCTG is seriously concerned that the underpinning rationale behind the proposals does not appear to be maritime safety. From the proposal document and discussion with senior MCA officials it would appear that the proposals are driven by a mix of internal MCA issues such as resolving industrial relations; resolving lease issues arising from particular stations and as a method for the MCA to realise value from particular saleable assets.

The cost savings to be achieved from these proposals would appear marginal over a 25 year period – any savings will be lost if, for example, one major tanker incident occurs in the Minch.

The proposals will lead to the loss of local knowledge, which is an issue of significant concern in an area where the Gaelic language predominates. The OHCTG believes that this loss of local knowledge will inevitably lead to increased response times; will lead to confusion and will unfortunately put lives at risk.

The proposals to base the service around two MOCs is seriously flawed; has not been appropriately risk-assessed; will not provide the required resilience and will lead to staff employment / retention challenges.

Question 4 (Chapter 4)

Our proposals for Maritime Operations Centres and sub-centres locates these around the UK coastline and makes use of the MCA current estate. What is your opinion on the proposals for the location of these Centres and sub-centres? Please provide supporting reasons for your comments. Do you have particular comments or information about factors that should influence the choice of sites for sub-centres in either Belfast or Liverpool, or either Stornoway or Shetland?

As outlined at Question 3, the OHCTG takes the view that the present MCA proposal is the wrong approach; that it is inappropriate; that it will not prove ineffective and that it carries too great a level of risk. In the OHCTG's view a false choice and an inappropriate approach is being offered by seeking to put regional centres into competition, whether that be Belfast and Liverpool or Stornoway and Shetland.

As previously stated the OHCTG is seriously concerned that the underpinning rationale behind the proposals does not appear to be maritime safety but rather a mix of internal MCA issues. This does not appear an appropriate or rational approach to such a major change.

In the view of the OHCTG there are a series of over-whelming reasons as to why it is essential to maintain coastguard presence in Stornoway. That presence should be as a fully functioning Marine Rescue Coordination Centre (MRCC) and not as a sub-station.

It is self-evident that the more remote a community the greater the risk – this is particularly true of an island community which is on the very periphery of Europe and the UK and faces some of the UK's most extreme and hostile weather conditions.

The Outer Hebrides is a unique part of the UK that is heavily dependent on the sea and as such views the coastguard service as a major element of the emergency services. The

local economy is a maritime economy with activity ranging from the ferries that provide lifeline services through to traditional industries such as fishing and aquaculture and the ever-increasing cruise-ship and sea-based leisure-tourism markets. Marine renewables and oil / gas exploration in the waters west of the Hebrides is increasing year-on-year. Oil-laden tankers transit through the Minch and also utilise the deep-water lane, west of the islands. Activity and tonnages has grown steadily over the past period.

It is essential for the Hebridean community to have coastguard presence and the support infrastructure to deal with any incident arising. The Stornoway service has strong links and bonds to the community and the community in return has a high level of confidence in the service – that confidence would be detrimentally affected by the loss of the service.

A locally based service would provide the critical understanding required in relation to local Gaelic / Norse place names including duplications and spelling / phonetic difficulties.

Stornoway coastguard provides critical assistance to the police in the co-ordination of land Search and Rescue operations and provides assistance and indeed a lead role in non-maritime emergency incidents e.g. weather related emergencies. The Stornoway coastguard provides a detailed understanding of helicopter operations and the associated terminology / support requirements such as fuel sites, helicopter landing sites and safe helicopter transit through military danger areas etc.

The Stornoway coastguard station is a modern, adaptable site, wholly owned by the MCA which already houses many functions and facilities.

Question 5 (Chapter 4)

In your view, are the new roles and responsibilities for Coastguard officers at different levels in the proposed structure appropriate to the tasks that need to be delivered? Please provide supporting reasons for your comments.

The OHCTG takes the view that the loss of so many coastguard officers at any one time is a major cause of concern. It is unclear as to whether the reductions are driven by the MOC proposals and their staffing requirements or whether it is based on UK-wide service needs.

There is an assumption that staff from a redundant station will easily move to an operational station. This suggests a degree of mobility that may not necessarily be there. Given the significant differential in housing and related economic conditions between, for example Stornoway and Aberdeen, it would appear unlikely that many staff could make the transition from Stornoway to Aberdeen, whereas a transition in the opposite direction would be far more achievable. If these elements are not carefully managed and there is reluctance for staff to move from one location to another due to economic factors, the service could potentially lose significant numbers of experienced staff and their highly valuable skills and knowledge.

The reduction in officer numbers could also potentially result in a more limited pool of officers to call on in emergency situations. This could be highly material in a major incident spread over a number of days where officer fatigue could become a critical factor.

The OHCTG is extremely concerned that the new structure will result in the loss of critical local knowledge and experience.

Question 6 (Chapter 5)

Under these proposals the regular Coastguard working in Maritime Operations Centres and sub-centres will draw more heavily on the local knowledge of geography, community and coastal risk provided by the network of local volunteer HM Coastguard Rescue Teams and increased liaison with partner SAR organisations. Do you agree that this is the best way to ensure the availability of such knowledge. Please provide supporting reasons for your statement.

The OHCTG views this approach as an entirely illogical proposition. Rather than be reliant on the knowledge of professional, skilled, locally-based coastguard officers, the national coastguard service will, in future, be heavily reliant on the knowledge of local volunteers. The OHCTG has significant concern in regard to how this will work in practice and particularly how will this work when volunteers are being tasked? There is significant potential for valuable time being lost as the MOC tries to pull down the required knowledge from the volunteers and volunteers seek to fully ascertain the situation with the MOC.

Volunteers play a critical and highly-valued role, but they have to be confident when they are being tasked that those who are tasking them have appropriate and detailed knowledge and are not sending them out into potentially hazardous situations without the full knowledge of local circumstance. Local consultation suggests that these are changes and approaches that volunteers would not be comfortable with. In the view of OHCTG these changes have the potential to detrimentally impact on the confidence and commitment of the volunteer base.

The OHCTG takes the view that it is essential for coordinating staff to have local knowledge. That local knowledge is best provided by local coordinating staff based in local coastguard stations.

Question 7 (Chapter 5)

In your opinion, will the proposed strengthening of management for the Coastguard Rescue Service organisation, including the introduction of 24/7 on-call Coastal Safety Officers, provide a more resilient response service to those in need in UK coastal areas? Please provide supporting reasons for your comments.

For the reasons articulated previously, the OHCTG takes the view that the MCA is pursuing the wrong approach. The OHCTG takes the view that the proposals have not been thought through from both a technical and cost basis and that if they are implemented will inevitably lead to serious, detrimental safety and environmental impacts.

Any further comments you may wish to make:

In the view of the OHCTG it is unacceptable that the ETV has been withdrawn unilaterally by the UK Government. It is unacceptable that the ETV issues are not being formally considered within the present consultation. It is impossible to see how radical changes to coastguard provision can be contemplated while simultaneously one of the most essential tools in regard to emergency towing; pollution response; salvage and life-saving capability is withdrawn.

Appendix 1 to this consultation response document elaborates on these issues and considers other issues beyond the scope of the seven preceding questions. It also provides an overview in regard to an alternative modernisation proposition.

Freedom of Information

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.

APPENDIX 1: OUTER HEBRIDES COASTGUARD TASK GROUP

MARINE COASTGUARD AGENCY: CONSULTATION RESPONSE

- 1.1 The OHCTG has carefully considered the proposals presented in the Maritime and Coastguard Agency (MCA) document: “Protecting Our Seas and Shores in the 21st Century: Consultation on Proposals for Modernising the Coastguard 2010” and welcomes the opportunity to respond to that consultation. Following extensive local consultation and detailed independent research the OHCTG takes the view that the MCA proposals are fundamentally flawed. The OHCTG does not believe that the proposals will enhance the service; instead we believe it will increase risk and compromise the safety of shipping and mariners around the UK in general and around the north and west of Scotland in particular.
- 1.2 The OHCTG is supportive of the modernisation of the coastguard service, but do not believe that the proposals brought forward by the MCA are appropriate for a number of reasons. The OHCTG believes the MCA proposals to be ill thought through from both a technical and cost basis and as a result their implementation will inevitably lead to serious, detrimental safety and environmental impacts.
- 1.3 The MCA have not been able to credibly articulate the benefits arising from their proposals and as a result there is no confidence in their approach or in their proposals. Their proposals do not carry the confidence of the public of the Outer Hebrides; local coastguard staff; front-line volunteers; the fishing community; the Local Authority or the Outer Hebrides Community Planning Partnership.
- 1.4 The community of the Outer Hebrides believes that the proposals, if implemented, will in effect dismantle both the local and the wider UK insurance policy against serious incidents.
- 1.5 The OHCTG is seriously concerned that the underpinning rationale behind the proposals does not appear to be maritime safety. From discussion with senior MCA officials it would appear that the proposals are driven by a mix of internal MCA issues such as resolving industrial relations; resolving lease issues arising from particular stations and as a method for the MCA to realise value from particular saleable assets.
- 1.6 The cost savings to be achieved from these proposals would appear marginal over a 25 year period – any savings will be lost if, for example, one major tanker incident occurs in the Minch.
- 1.7 The proposals are technically flawed with serious doubts in regard to the proposed technology solution. These concerns are underpinned by a March 2011 report from The Royal Academy of Engineering entitled “Global Navigation Space Systems: Reliance and Vulnerabilities”. The report overviews reliance issues and in the Executive Summary states:

“A failure, or loss of signal due to some outside influence, can result in a range of consequences depending on the application...where systems are used in safety of life critical applications, the consequences can be more severe – in some situations, even if operators are well-versed in procedures for a loss of GNSS (Global Navigation Satellite Systems) signals, the number of interlinked systems simultaneously activating alarms can lead to eroded situational awareness of operation in what could well be an emergency situation”.

- 1.8 It is due to this risk of “eroded situational awareness” that the OHCTG believes that the technology solution proposed by the MCA carries too high a level of risk and should not be implemented.
- 1.9 The proposals will lead to the loss of local knowledge, which is an issue of significant concern in an area where the Gaelic language predominates.
- 1.10 The proposals to base the service around two Maritime Operation Centres (MOC) is seriously flawed; has not been appropriately risk-assessed; will not provide the required resilience and will lead to staff employment / retention challenges.
- 1.11 The OHCTG is supportive of a well-thought through and thoroughly-analysed modernisation of the coastguard service. The primary goal of that modernisation should be to enhance the safety of coastal communities and mariners.
- 1.12 The cumulative impact of the proposed modernisation; the withdrawal of the ETV; the withdrawal of the Maritime Incident Response Group; the withdrawal of Nimrod and the continuing uncertainty around the helicopter rescue service create unacceptable risk.
- 1.13 All of these issues would be challenging in their own right and would require careful planning and implementation. Implementing these elements simultaneously represents bad strategic planning and in the view of the OHCTG can only be characterised as dangerously reckless.
- 1.14 The proposed reforms are viewed as an efficiency saving but the potential gains are minimal. The savings are such a small part of the Department of Transport’s overall budget that they were not included in the Department’s Comprehensive Spending Review.
- 1.15 The OHCTG does, however, recognise the need for savings to be made to assist the reduction of the UK’s structural deficit. Reductions in lifeline services, such as the coastguard service, have to be carefully planned and thought through, with the primary goal being enhancement of marine safety. The OHCTG does not believe this has been achieved within the MCA consultation proposals. The OHCTG takes the view, however, that there are alternative models that will protect and enhance safety, while at the same time achieving cost savings. We believe that the following draft proposal will achieve these two critical goals.

COASTGUARD MODERNISATION: A POSITIVE ALTERNATIVE

- 2.1 As stated above the OHCTG is supportive of the modernisation of the coastguard service, but does not believe that the proposals brought forward by the MCA are the right approach for this critical and highly regarded service. Representatives of the OHCTG were therefore heartened to hear Mike Penning, the Parliamentary Under-Secretary, state on a recent visit to Stornoway that the MCA proposals would not be implemented in their present form and that he was looking for groups and individuals to bring forward alternative proposals. The OHCTG welcomes this approach and believes that there is a strong case for an alternative model to be developed.
- 2.2 It is the view of the OHCTG that there is a strategic need to provide adequate and well-resourced coastguard cover for the entirety of the UK coastline. In the view of the OHCTG that cover requires to be 24-hour provision and as such we see little to no benefit in the provision of “daylight hours” stations.

- 2.3 To ensure the type of cover the OHCTG believes to be essential for the safety of our communities the OHCTG would advocate the establishment of 12 Marine Rescue Coordination Centres (MRCC), each operating 24 hours per-day. This approach would see the reduction and evolution of the existing MCA estate while simultaneously enabling retention of the current workforce's skills, experience and local knowledge. This approach would also allow sites to mutually support each other, should one be experiencing a particular surge in activity.
- 2.4 The OHCTG's 12-centre model would propose six stations for England plus two stations for Wales, covering approximately 40% of the UK Search and Rescue Region (SRR). The model would have one station in Northern Ireland. In Scotland three MRCCs are proposed.
- 2.5 In Scotland the OHCTG take the view that a West Coast, North Coast and East Coast MRCC are appropriate. These would be located in Stornoway, Lerwick and Aberdeen, with the four (Scotland + Northern Ireland) stations covering 60% of the UK SRR. This will provide an appropriate spread of strategic centres and would provide a balanced service map across the UK.
- 2.6 Linking Stornoway, Lerwick and Aberdeen would create a Scottish "tri-service" centre, which would allow the co-location of resilience. Under the model Stornoway would have primary responsibility for the West Coast while Aberdeen would have primary responsibility for the East coast and Shetland the North Coast including Orkney and Shetland.
- 2.7 The most significant difference between this approach and the MCA's proposals is that the "local" MRCC would retain overall command of any incident. This approach would ensure that the station with the best knowledge of the particular area would retain command of the incident. In the view of the OHCTG this approach would be significantly more resilient than the two MOC approach proposed in the MCA consultation.
- 2.8 In the view of the OHCTG it is essential that there is a full appreciation of what is meant by the term local knowledge. In the view of the OHCTG local knowledge is not the ability to remotely call up a "google map". To us local knowledge is a detailed "situational awareness" of the coastal and maritime environment - it is a deep understanding of the geographical features; topography; weather; daily activity patterns; the users of the water (fishing / merchant / leisure etc.); the users of the coastline and littoral areas (walkers / anglers, etc.); the culture; the language and accents; the personalities; communities and lastly, it is the critical working relationship between the station and the units it calls out and the civil contingency partners with whom it works.
- 2.9 The proposed OHCTG model would deliver this critical local knowledge, but it would also be able to incorporate the "operational pairing" referred to by the MCA consultation document. The model would also have the added advantage of reducing manpower requirements while allowing appropriate system flexibility to facilitate leave, training, etc.
- 2.10 It is anticipated that each MRCC would require approximately 22 operations staff.
- 2.11 Each of the 12 MRCCs would provide:
- capacity for critical local knowledge;

- an embedded presence in local communities, which would command the confidence of the general public and marine users;
- direct or indirect links to all coastguard aeriels, with the capability of receiving communications from vessels anywhere around the UK coast;
- more sites to spread the load will enable a major incident affecting any one site to be handled more efficiently thus increasing resilience;
- the ability to handle 999 calls made to the coastguard from any location within the UK on both landline and mobile phones;
- island-based stations (Stornoway, Shetland and Belfast) in remote sites, which will provide enhanced resilience in the event of a national crisis;
- staffing to cope with peak national demand, day and night, achieved at best cost via flexible staffing models, risk assessed staff reductions, etc.;
- balanced work-loading across the service, providing greater flexibility to manage training, leave, sick absence, while also providing staff with opportunities for role enhancement / new responsibilities;

2.12 The OHCTG takes the view that the 12 MRCC model may prove to be more politically acceptable both to the devolved administrations of Scotland, Wales and Northern Ireland and to the Members of the Westminster Parliament who will be responsible for signing off on this modernisation.

2.13 In relation to Stornoway the OHCTG sees a series of overwhelming reasons for an MRCC presence. These can be summarised as follows:

- it is self-evident that the more remote a community the greater the risk – this is particularly true of a island community which faces some of the UK's most hostile weather conditions;
- the Outer Hebrides (and indeed the north-west coast of Scotland) is a unique part of the UK that is heavily dependent on the sea and as such views the coastguard service as a major element of the emergency services;
- the Stornoway service has strong links and bonds to the community and the community in return has a high level of confidence in the service – that confidence would be detrimentally affected by the loss of the service;
- a critical understanding in relation to local Gaelic / Norse place names including duplications and spelling / phonetic difficulties;
- the provision of assistance to the police in the co-ordination of land Search and Rescue operations;
- the provision of assistance and indeed a lead role in non-maritime emergency incidents e.g. weather related;
- detailed understanding of helicopter operations and the associated terminology / support requirements such as fuel sites, helicopter landing sites and safe helicopter transit through military danger areas etc.;

- the existing Stornoway station is a modern, adaptable site, wholly owned by the MCA which already houses many functions and facilities.

2.14 It is also critical to be aware of the strategic location of the present Stornoway facility and the key role it undertakes in relation to international shipping in the north Atlantic. The coastguard station is a reporting station for international shipping entering, transiting and exiting European waters. This is a critical pan-European function that allows a full understanding of shipping active in British and European waters.

WITHDRAWAL OF THE EMERGENCY TOWING VESSEL

3.1 OHCTG views the withdrawal of the ETVs as an entirely retrograde step. It is viewed as regrettable in the extreme that the withdrawal was announced with no formal consultation or discussion. It is understood that that the need for ETV provision is not disputed but that the UK Government does not believe that it is now appropriate for the ETV provision to be publicly funded and that a commercial solution be brought to bear.

3.2 The approach and need for ETV provision is most eloquently stated within the MCA's own documents. An MCA Report entitled "Emergency Towing Vessels Assessment of Requirements", undertaken by Marico Marine and dated November 2008 states at the synopsis:

"The United Kingdom appears to have little option but to continue its involvement in the contracting of Emergency Towing Vessels (ETV). Lack of capability within the commercial tug and towage sector (in effect market failure), European Union obligations, and societal expectations (zero tolerance of major marine environmental incidents) combine to dictate the need for this contingent capability. In cost benefit terms, averting one major shipping disaster and environmental incident of the scale of the Prestige would justify a contract price far in excess of that currently being paid until its expiry in 2011 and beyond."

3.3 The Executive Summary is equally unambiguous. It states:

"The present contract, which operates until the end of September 2011, deploys four relatively large tugs sourced from the offshore oil sector on permanent stand-by at four strategic locations (Dover Strait, the Western Approaches, the Fair Isle Strait and The Minch). They represent a major resource capability in seeking to avert a major merchant-shipping casualty (grounding, foundering, sinking etc) and, in particular, a subsequent marine environmental pollution (oil and/or other hazardous substances) occurrence anywhere within the UK's Pollution Control Zone (UKPCZ).

The key function of an ETV is to intercept ships that are disabled, largely the result of mechanical (engine and / or steering) breakdown, thence secure a tow to bring the crippled vessel under control to prevent catastrophic event escalation. The ETV may also be required to tow the casualty to a location of safety, generally known as a place of refuge. This must often be achieved in a limited time frame, or window of opportunity, prior to the vessel incurring significant damage and losing structural integrity, such as might follow being driven ashore, as seen in the loss of the tankers Amoco Cadiz and Braer, or simply succumbing to the elements, as was the case for the tanker Prestige. "

- 3.4 The ETVs were put in place following the recommendations of Lord Donaldson following the Braer disaster. Shipping movements and tonnages have greatly increased since the Braer. Given that increased activity, it is the view of the OHCTG that the loss of the ETV will inevitably lead to an incident, which will result in devastating environmental impacts. The costs of any such incident will be significantly greater than any savings to be realised through the ETVs' withdrawal.
- 3.5 OHCTG does not believe that there is a commercial solution available in the north west of Scotland. A commercial operator will not come in to fill the void left by the withdrawal of the ETV. As the MCA report states that is clear market failure.
- 3.6 Given available ETV capacity in the North Sea and English Channel, the view of OHCTG is that there is a high probability of a market-based solution being brought to bear in these areas. That there may be a market-based solution in one part of the country should not, however, lead to the conclusion that there is a market solution readily available for the entirety of the UK.
- 3.7 OHCTG would advocate a position where the southern ETVs are put out to market solution, but that the two northern ETVs are retained by the public sector until a mechanism can be developed to allow a revising of the contract arrangements.
- 3.8 There may be some merit in seeking a more commercial approach, but the unilateral cancellation of the ETV contract will significantly jeopardise that goal.

RISK ASSESSMENT

- 4.1 On production of the MCA consultation document, and after discussion with MCA officials, representatives of the OHCTG were extremely concerned to find out that such significant changes were being contemplated without the undertaking of a risk assessment. This is a serious omission that has led to the OHCTG commissioning its own independent risk assessment from respected marine consultancy Eagle Lion Pope (ELP).
- 4.2 The ELP risk assessment was undertaken using an International Maritime Organisation (IMO) based risk matrix and criteria for risk to people, environment, property and business. The risk assessment was based on IMO Formal Risk Assessment steps of 1) hazard identification; 2) risk assessment and 3) risk control options. (Ref: IMO Guidelines for Formal Safety Assessment and the UK Health and Safety Executive Marine Risk Assessment (Ref HSE Marine Risk Assessment 2001/63).
- 4.3 The risk assessment considered:
 - The combined sea areas of both Shetland and Stornoway coastguard responsibility and a range of emergencies that could be experienced in these locations;
 - removal of all ETV cover and response; and
 - removal of all Marine Intervention Response Group (MIRG) cover and response.
- 4.4 The final assessment is unambiguous and 100% clear that the withdrawal of the ETV is going to significantly increase risk around the Outer Hebrides.
- 4.5 The assessment also compared the MCA's consultation document solution against both the status quo and the OHCTG's proposed 12-MRCC solution. This shows that

the withdrawal of the ETV is going to be main element in relation to risk, with risk significantly increased due to the withdrawal in both the MOC or MRCC scenarios. When comparing the MCA's solution against the OHCTG's solution, the independent assessment, however, suggests that there are advantages in relation to the OHCTG's proposals.

4.6 The following are the critical summary statements from the assessment document:

- Both the MRCC and MCA proposals have much greater numbers of high results compared with the present case. (due, in full, to the withdrawal of the ETV and MIRG).
- Short response time is vital to the prevention of escalation of any marine incident. Responders typically refer to the 20 minute rule where if an initial response to an incident has not been generated within 20 minutes then any subsequent response stands a strong chance of being less effective.
- In incidents that require local knowledge for effective response, the people who are best placed and best understand the immediate area are the local coastguard. Their immediate intervention will allow rapid recognition of sea-coastal areas described, size and probable manning of named vessels, local response attitudes and resource availability, localised lay down and evacuation areas as well as other response services in the area such as paramedics.

4.7 Under virtually all the Risk Assessment hazards developed by ELP, there comments clearly demonstrate significant advantage arising from the 12 MRCC approach. The following summaries these comments:

Hazard 1.1: Large commercial fishing vessel NUC daytime

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 1.2: Large commercial fishing vessel NUC daytime - SOSREP appointed towage does not successfully intervene

Local contacts in fishing and commercial industry

Knowledge of local conditions currents etc

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 1.3: Large commercial fishing vessel NUC night time

Improved communication in contacting Harbour tug / commercial vessels against MCA proposal

Minimised delay in arranging suitable towage

Local contacts in fishing and commercial industry Knowledge of local conditions currents etc

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 1.4: Large commercial fishing vessel fire day time

Local knowledge

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG

Hazard 1.5: Large commercial fishing vessel fire night time

Local knowledge

Minimised response time

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 1.6: Grounding of large commercial fishing vessel daylight

Hazard 1.7: Grounding of large commercial fishing vessel night time

Both hazards: MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 1.8: People Collision of large commercial fishing vessel with another fishing vessel

Local knowledge

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 2.1: Yacht incident night time (fire or grounding)

Improved response times in reaching casualty on MCA proposal

Hazard 3.1: Commercial vessels other than cruise ships, tankers and inter island ferries becoming NUC and potential grounding at daytime

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 3.2: Commercial vessels other than cruise ships, tankers and inter island ferries becoming NUC and potential grounding at night time

Minimised delay in arranging suitable towage

Minimised delay in SOSREP intervention

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 3.3: Commercial vessels other than cruise ships, tankers and inter island ferries involved in collision - daytime.

Hazard 3.4: Commercial vessels other than cruise ships, tankers and inter island ferries involved in collision - night time.

Hazard 3.5: Fire on commercial vessel other than cruise ships, tankers and inter island ferries day time

Hazard 3.6: Fire on commercial vessel other than cruise ships, tankers and inter island ferries night time

Hazard 4.1: Tanker becoming NUC and potential grounding at day time

Hazard 4.2: Tanker becoming NUC and potential grounding at night time

Hazard 4.3: Tanker involved in collision - daytime

Hazard 4.4: Tanker involved in collision - night time

Hazard 4.5: Fire on tanker during daytime

Hazard 4.6: Fire on tanker during night time

Hazard 5.1: Cruise ship becoming NUC and potential grounding at daytime

Hazard 5.2: Cruise ship becoming NUC and potential grounding at night time

Hazard 5.3: Cruise ship involved in collision - day light

Hazard 5.4: Cruise ship involved in collision - night time

Hazard 5.5: Fire on cruise ship - day time

Hazard 5.6: Fire on cruise ship - night time

Hazard 6.1: Inter island ferry becoming NUC and potential grounding at daytime

Hazard 6.2: Inter island ferry becoming NUC and potential grounding at night

Hazard 6.3: Inter island ferry involved in collision - day time

Hazard 6.4: Inter island ferry involved in collision - night time

Hazard 6.5: Fire on inter island ferry - daylight

Hazard 6.6: Fire on inter island ferry - night time

Hazard 7.1: Nuclear submarine incident (fire, grounding, collision)

Under each of the 23 hazards identified above ELP made the same comment: MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 8.1: Incident resulting in pollution in proximity to aquaculture area - day

Hazard 8.2: Incident resulting in Pollution in proximity to aquaculture area - night

MRCC proposal will reduce impact on aquaculture in comparison to the MCA proposal

MRCC proposal will reduce impact on the local economy in comparison to the MCA proposal

MRCC proposal will improve the response times – but there will be no reduction in severity or probability, due to the removal of active intervention of the ETV and MIRG.

Hazard 9.1: Persons in water unintentionally

Hazard 9.2: Divers suffering from decompression sickness

Hazard 10.1: Aircraft ditching

Hazard 11.1: Person stranded on cliff

Hazard 11.2: Incident on beach

Under each of the five hazards identified above, ELP made the same comment: Local knowledge leads to prompt recovery

4.8 Two critical elements are therefore clear from the risk assessment:

- the removal of the ETV and MIRG will significantly increase risk – it will in effect remove the most critical tool at the disposal of the coastguard and others to prevent incidents escalating and mitigating against the impacts of accidents that do happen; and
- the MRCC proposal will offer clear improved local knowledge and improved response times over the MCA proposal – as identified previously, short response time is vital to the prevention of escalation of any marine incident.

4.8 It is also worth noting that the MRCC proposals will assist in the reduction of any economic impacts arising in the local economy as a result of a pollution incident (Hazards 8.1 and 8.2). For a fragile rural economy, such as that in the Outer Hebrides, this should be a critical consideration.

ECONOMIC IMPACTS

5.1 The OHCTG is also concerned in relation to the lack of assessment in the MCA consultation documents in regard to economic impacts and related to that the lack of any form of economic appraisal in regard to the withdrawal of the ETV. OHCTG believes this is also a serious omission and as a result commissioned (through Highlands and Islands Enterprise) independent economic assessment of the issues from respected economic consultant Steve Westbrook.

5.2 That assessment work demonstrates major impacts as a result of an incident occurring in the absence of the ETV.

5.3 The assessment was based on the actual impacts that arose from the Braer incident in Shetland in January 1993, when 84,000 tonnes of crude oil were spilled in the waters off Shetland. The physical impact of this spill included the prohibition for a period of

fishing and salmon farming within a 400 mile "Fisheries Exclusion Zone" which was established off the south-west of Shetland. A range of studies have been undertaken into the economic impacts of that spill, with the resulting impacts (both direct and indirect) now well understood. The following assessment therefore uses the Braer impacts as a base for extrapolating potential local impact.

5.4 The following is quoted directly from the study:

- Future incidents off the Outer Hebrides could take many forms, but for illustrative purposes, an oil spill similar to the Braer would have the following pro-rata impacts on the area's tourism and seafood sectors...(although, in practice, circumstances would be different, and the current structures of the tourism and seafood sectors in the Outer Hebrides would differ from those in Shetland in 1993).

Tourism Impact – First Year	75 ftes (-5%)
Tourism Impact – Cumulative over six years	840 ftes (-56%)
Seafood Sector Impact – First Year	332 ftes (-28%)
Seafood Sector Impact – Cumulative over four years	510 ftes (-43%)

- In addition, there would be negative impacts on agricultural production, food and drink production other than seafood, seaweed harvesting, property values, and other aspects of the area's economy from a major oil spill; while, if the spill were to the east of the Outer Hebrides, there could also be a major impact on the Highland economy.

5.5 The annual financial impact of this in loss of value from the local economy would be over £4m per annum, far in excess of the cost of retaining the ETV.