TRANSFER OF LIQUID CARGO BETWEEN VESSELS (OIL)
Portland Harbour Jurisdiction

Environmental Statement
Non-Technical Summary

In support of an application by Portland Harbour Authority, to the Maritime and Coastguard Agency, for an Oil Transfer Licence, in accordance with the requirements of the Merchant Shipping (Ship-to-Ship Transfers) Regulations 2020

version-21 June 2021

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1.1. INTRODUCTION

Portland Harbour Authority is a statutory harbour authority with the applicable legislation being the Portland Harbour Revision Order 1997. The harbour authority is making an application for an Oil Transfer Licence (OTL) under the Merchant Shipping (Ship-to-Ship Transfers) Regulations.

This Environmental Statement forms part of the application and comprises 13 chapters in total as follows:

- **Chapters 1-3** comprise an introduction, describe the assessment methodology and include details about the proposal
- **Chapters 4-10** comprise technical chapters that consider the baseline and potential impact
- **Chapters 11 and 12** include details of the measures that would be adopted and residual impact
- **Chapter 13** comprises the summary and conclusion.

Legislation of most relevance to the application is the Merchant Shipping (Ship-To-Ship Transfers) as this is what sets out the requirement to make this application. It also specifies the need for a supporting Environmental Statement. The Habitat Regulations and Water Environment (Water Framework Directive) (England and Wales) Regulations also apply and require specific assessments which are discussed in chapters 5 and 6 respectively, with reports provided as appendices to the application.

Portland Harbour Authority have maintained contact with the Maritime & Coastguard Agency who are the lead authority for this application, seeking early guidance in preparing the application, and providing updates on progress, as well as clarifying details on the submission process. The Portland Harbour Consultative Committee has also provided a means of pre-application consultation on the proposals.

The Maritime & Coastguard Agency (MCA) are the lead authority on this application. In the lead up to making the application Portland Harbour Authority have been seeking their guidance with the aim of ensuring it meets the requirements of the legislation both in form and content. The Portland Harbour Consultative Committee also provides a means of pre-application consultation on the proposals and have been briefed and consulted in the lead up to making the application.

At the heart of the process of making an application is ensuring that the harbour authority puts in place a robust safety and environmental management system that it is Portland Marine Safety Code compliant. This includes ensuring that service providers that oversee the transfer operations and vessels participating in the transfer adhere to the latest industry standards and have in place their own robust safety and environmental management systems.

1.2. APPROACH

This chapter includes details of the approach to the environmental assessment. This is set out under the following sub-sections:

- The Proposals and Key Environmental Risks
- Potential Aspects of Environment Likely to be Significantly Affected
- Baseline
- Prediction and Assessment of Potential Environmental Effects
- Identification of measures
- Prediction of Residual Environmental Effects
- The Non-Technical Summary
- Description of any difficulties

By standardising the approach to environmental assessment for each technical chapter the aim is to set out a clear approach to the assessment process, and the resulting measures that have been identified.

This is to ensure there is a clear understanding of the implications for users and the local environment, and in turn instilling confidence that the operation can be done safely for people and the environment.

1.3. PROPOSALS

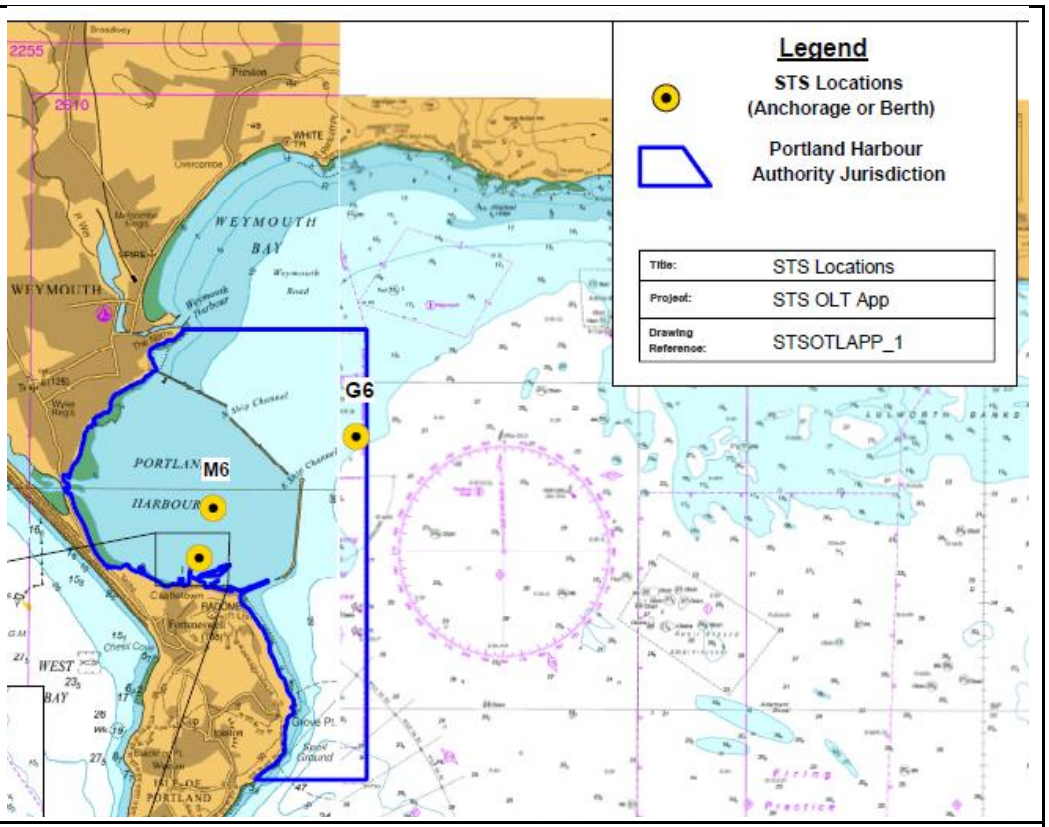
This section provides an overview of the proposals and potential environmental effects, discussed in the following subsections:

- Economic Opportunity/ Alternatives
- Description of the Proposed Cargo Transfers
- Potential Environmental Effects/ Risks

From an economic perspective the service is underpinned by a sound business evaluation, it is designed with navigational and environmental safety at the heart, and rather than propose new locations within the harbour, the operation can be accommodated within existing commercial anchorages. It will compliment similar operations elsewhere in England, the United Kingdom and further afield in Europe. It will also compliment other existing services offered by the port, its tenants and users, and create opportunities for new services in the port that don't already exist.

The proposed cargo transfer will entail the transfer of oil from one ship (known as the mother vessel) to another ship (known as the daughter vessel). This practice is known as "Ship-to-Ship transfer". The Harbour Authority will work in partnership with STS service providers, to ensure that safe STS transfer operations are carried out.

The proposals are summarised as follows:

Locations of Proposed Cargo Transfers – G6, M6 and Queens Pier	
Types of substances to be transferred	• Light oils; medium oils; heavy fuel oils; • Light, medium and heavy crude oils • debunkering of all types of standard and off spec bunker fuel

Quantities of each substance	• Based on a maximum draft of 17m the largest vessel would be a Suezmax that has the capability to transfer 130,000MTs of cargo. • The average quantities at Southwold range from 35,000MT/transfer to 80,000MT/transfer so an equivalent assumption is made for the purpose of this application. • Assuming 48 operations per annum, transfer quantity would be 6,240,000MTs
Frequency of transfers -	• 4 operations per month is considered to be a reasonable assumption leading to an assessment of 48 operations per annum
Types of ship to be used to carry out the transfers -	• Handy size, Medium Range (MR), Panamax, Aframax also known as LR1(Long Range), Aframax with coated tanks LR2 and Suezmax as examples

The nature of the operation is such that the main environmental risks can be described as

- **Movement and presence of ships -** the focus has been on activity associated with two vessels coming alongside each other whether at berth or anchorage, as well as the transfer of oil between vessels.
- **Accidental oil spill -** The priority for an operation of this kind is to ensure that measures are in place to prevent a spill. It is also important to be prepared in the unlikely event of a spill, therefore a worst-case scenario has been quantified taken account of the preventative measures that have been identified. In the case of Portland, this assumes a failure of both hoses, with a total inventory of 33m^3 of product lost. Numerical modelling was also used to understand the behaviour of oil in the unlikely event of an accidental spill. All measures are discussed in Chapter 11 but it is important to state here that these include a Tier 1 and 2 onsite response capability, providing a 1 hour response provision for the duration of an operation.
- **Discharge of ballast water during transfer process. -** the application environmental assessment takes account of the ports existing Local Notice to Mariners relating to Ballast Water Management and also the March -June 2021 consultation on draft regulations

In the case of debunkering the measures for bunkering would apply as the operation is the same but in reverse.

1.4. HUMAN BEINGS

This chapter considers health and safety, harbour users and, local population and economy and the associated impact of the proposed operations on these aspects. Taking each one in turn:

- **Health and Safety** - Portland Harbour Authority is responsible for navigational safety of the harbour area and its users, and also has economic, environmental and heritage responsibilities. The Harbour Authority's management practices are externally assessed against the Port Marine Safety Code, this includes maintaining a record of all incidents that take place on the water. Portland Ports safety management system is reviewed, audited and updated on a regular basis. The port have completed a risk assessment and as a result, updated some procedures to take account of STS operations, and created additional procedures to ensure the operation can be delivered safely. There is a risk of an accidental oil spill with prevention being the priority. The harbour authority has updated its oil and marine pollution plan to ensure this is fit for purpose, and more recently reviewed and updated the pollution standard operating procedure to take STS into account.

- **Harbour Users -** Portland Harbour and Weymouth Bay are home to a diverse range of users.

Portland Harbour Authority's Harbour Consultative Committee offers a means of regularly meeting such that harbour activities and management can be discussed. Users of the harbour that are represented include: shipping, defence, commercial, fishing interests, conservation interests, diving interests, recreational interests, sailing interests and operational interests. A further group of harbour users are the Hamm Beach User Group made up of representatives from the organisation/sporting groups who use the Hamm Beach for teaching or leisure purposes such as windsurfing and Kitesurfing. The operations is considered to be able to take place whilst allowing other users to continue. The importance of maintaining a range of communication channels with users is considered to be an important means of ensuring business as usual for all.

- **Local Population and Economy** - The former borough of Weymouth and Portland had an estimated population of 71,843 (Office of National Statistics, 2018). The Centre for Economics and Business Research (Cebr) was commissioned by Maritime UK to quantify the economic contribution of the Maritime sector *"The economic contribution of the UK Maritime sector A report for Maritime UK September 2017"* A full set of direct economic impacts for the South West region are found in the report. Maritime hubs locally include Portland and Weymouth. The closest commercial maritime areas to the proposed operations include Portland Port and Osprey Quay, also Weymouth Harbour. The proposed operation compliments the existing maritime economy that provides opportunities for existing businesses and new opportunities for others. In the event of an accidental oil spill the consequences could be significant thus again emphasising the need for prevention as a priority and a robust response to minimise impact. The risk of introduction of invasive species is recognised with shipping and is ballast water management is a factor of this operation. Compliance with the harbour authority's Local Notice to Mariners is a requirement of the operation and a measure included in the General Direction.

In conclusion the impact of the operation on health and safety, harbour users and, local population and economy, taking account of the measures is considered to be negligible.

1.5. FAUNA AND FLORA

Portland harbour Authority have considered fauna and flora in 2 parts:

1. Habitats and Species protected by the Habitat Regulations
2. Habitats and Species protected by legislation other than the Habitat Regulations

The harbour authority has developed supporting technical reports for (1) and (2) above. The information in these reports is presented in this chapter in a form that is consistent with the Approach to Assessment Methodology described in Chapter 2, and provided as appendices to this chapter together with the letter from Natural England that supported the assessment that had been completed by the harbour authority.

- The first report is called a Habitats Regulations Assessment (HRA) which must be undertaken to determine if the proposed operation may affect the protected features of a habitats site (also known as European Sites). Of relevance locally are the Chesil and the Fleet SAC, Chesil Beach and the Fleet SPA, Chesil Beach and the Fleet Ramsar, Studland to Portland SAC, and Isle of Portland to Studland Cliffs SAC.
- The second report has been called a Nature Conservation Review and considers those habitat sites and species that are protected by legislation other than the Habitat Regulations. Of relevance locally are sites including the Chesil Beach & Stennis Ledges MCZ, Chesil & The Fleet SSSI, Portland Harbour Shore SSSI, Isle of Portland SSSI and South Dorset Coast SSSI. In the case of habitats and species, the Lagoon Sandworm, Spiny seahorses, Seagrass beds and mud habitats in deep water (sea-pen and burrowing megafauna communities) attract protected status.

A list of habitats and species either protected through a site designation or in their own right is provided as follows:

Type	Qualifying (Designated) Features Summary
Habitat –	**European** • Coastal Lagoon, • Reefs, • Atlantic salt meadows (Glauco-Puccinellietalia maritimae), • Mediterranean and thermo-Atlantic halophilous scrubs (Sarcocornetea fruticosi), • H1210 Annual vegetation of drift lines, • H1230 Vegetated sea cliffs of the Atlantic and Baltic coasts, • H6210 Semi-natural dry grasslands and scrubland facies: on calcareous substrates (FestucoBrometalia) **UK** • Intertidal coarse sediment • Littoral rock • Inshore sublittoral sediment • Supralittoral rock • Littoral sediment • Neutral grassland – lowland (land) • Earth heritage • Supralittoral sediment • Broadleaved, mixed and yew woodland - lowland main habitat (land) • Supralittoral rock (coastal scrub on clay substrates on NE facing slopes)
Species -	**European** • Widgeon (Mareca penelope) - Non-breeding, • Little tern (Sternula albifrons) - Breeding, • S1654. Gentianella anglica; Early gentian **UK** • Lagoon Sandworm, Armandia Cirrhosa • Spiny seahorses Hippocampus guttulatus Seagrass beds (Zostera spp.) • Mud habitats in deep water (sea-pen and burrowing megafauna communities)

The potential effects and measure are summarised as follows:

Project Activity	Potential Environmental Effect	Measure Overview
Movement and presence of ships	Air Quality	Measures are proposed to reduce the loss of transfer operations. This has been incorporated into the General Direction. .
Accidental oil spill	Water Quality • Contaminants • Dissolved Oxygen • Turbidity	Consequences of an oil spill on a number of receptors could be significant. Procedures have been created to reduce the risk of an accidental discharge of oil. In the unlikely event of an accidental oil spill, the Portland Harbour Authority's Oil Spill and Marine Pollution Contingency Plan will be enacted to contain and remove pollutant.

Release of ballast water	Non-Native Species and Pathogens	Compliance with the harbour authority's Local Notice to Mariners is a requirement of the operation and a measure included in the general Direction.

Our conclusion having undertaken a "Habitat Regulation Assessment" is that the project either individually or in-combination with other plans or projects, will not have a significant effect on any European Sites and the associated habitats and species within. Additionally, having also undertaken a "Nature Conservation Review" that considers sites, habitats and species that receive protection from legislation other than the habitat regulations, the harbour authority has similarly concluded no significant effect.

1.6. WATER

This section considers the potential impacts on the water environment. In doing so it considers the findings of a Water Framework Directive Assessment which was conducted to assess the impact of the proposal against the water framework directive.

The formal supporting Water Framework Directive Assessment is included with the application as a separate Appendix.

The key objectives of the water framework directive are:

- general protection of the aquatic ecology
- specific protection of unique and valuable habitats
- protection of drinking water resources
- and protection of bathing water.

The baseline considers the transfer locations and applicable waterbodies, the current status of those waterbodies and discusses the baseline using the following receptors:

- hydromorphology
- biology – habitats
- biology – fish
- water quality
- protected areas
- Invasive Non-Native Species

The assessment considers each of the project activities and associated impact on these receptors ultimately evaluating the implications of the project on the status of the relevant waterbodies. The Water Framework Directive Assessment is included as an appendix to this chapter.

For the purpose of impact assessment the table below shows how the activities described in the Water Framework Directive Assessment (and the Habitats Regulation Assessment) relates to the activities used for the purposes environmental impact assessment:

Water framework directive assessment the activities	Equivalent activities used for the purpose of Environmental Impact Assessment
• Transport – Vessel Movements	• Movement and presence of vessels
• Transport – Vessel Discharge/Emissions	• Accidental oil spill • Discharge of ballast water during transfer process.

All receptors apart from biology- fish were taken forward to full assessment as follows:

Summary of possible effects

Project Activity	Potential Environmental Effect	Discussion
Movement and presence of ships	Hydromorphology; Biology – habitats Water Quality Protected Areas Invasive Non-Native Species	No additional risk over and above normal operations
Accidental oil spill	Biology – habitats Water Quality Protected Areas	Potential significant risk if an oil spill were to occur. Measures are proposed to reduce the likelihood of an accidental oil spill, and impact if one were to happen such that it can be considered negligible/ insignificant
Release of ballast water	Invasive Non-Native Species	Potential significant risk from introduction of invasive non-native species, therefore measures are proposed manage the risk such that it can be considered negligible/ insignificant

This chapter contains details of the Water Framework Directive Risk Assessment in a form that is consistent with the format described in the Section 2 Approach to Environmental Assessment. A robust set of measures has been introduced to ensure that the operation can be delivered in a safe manner, that ensures the risk to the environment is as low as reasonably practical and does not compromise the requirements of the Water Framework Directive.

1.7. AIR AND CLIMATE

This chapter considers the impact on air quality from transfer operations. This scope of the assessment is focussed to the transfer of product.

Of particular relevance to air quality include Carbon Dioxide as Carbon, Nitrogen Oxides as NO2, Sulphur Dioxide, PM10 (Particulate Matter <10 um), PM 2.5 (Particulate Matter <2.5 um), PM1 (Particulate Matter <1 um) and VOCs (Non methane).

The risk from transfer operations specifically relates to VOCs. These can be released during transfer operations as tanks are vented, and from oil directly to the atmosphere in the event of an accidental oil spill.

The port have introduced a requirement that operators should use of VOC recovery system. A robust system of management measures has been designed to ensure the likelihood of an accidental oil spill is as low as reasonably practical, and in the unlikely event of an oil spill a response team is in place to respond such that the risk of a product reaching the shoreline is also as low as reasonably practical. It is therefore possible to conclude no significant impact on air quality.

1.8. LANDSCAPE AND SEASCAPE

This chapter considers the local landscape and seascape and potential impact of transfer operations.

Portland Harbour and Weymouth Bay have an extensive maritime and naval history. Prior to the construction of the breakwaters the area was known as Portland Roads, and was known as an important

anchorage dating back to the Roman Period. This maritime importance has continued since with its waters serving as an important anchorage for the Royal Navy and from 1995 a commercial port.

Much of the coastline surrounding Weymouth Bay and Portland Harbour are part of the Dorset Area of Outstanding Natural Beauty Dorset and East Devon Coast World Heritage Site (also known as the Jurassic Coast).

The Dorset Landscape Character Assessment (2009) categorises different landscapes character types surrounding Portland Harbour and Weymouth Bay to include Valley Pasture, Chalk Ridge/ Escarpment, Open Chalk Downland, Chalk Valley and Downland.

The area has been subject to a Seascape Character Assessment which was conducted for the South Coast Marine Plan and describes the location as *"a hub of social and economic activity linking coast and sea, including ports, shipping, fishing, transportation, recreation and tourism."*

The proposed transfers will take place in locations that are already subject to shipping activity and with the nature of the operation being similar to that of bunkering. It can therefore be concluded that the impact would be beneficial as it can manage the operation in an already operational port area that is recognised to be so in the South Coast Marine Plan. In the unlikely event of an oil spill if the oil were to reach the shore this would have a negative effect and therefor mitigation is required to minimise the risk of an incident happening, and a response capability is in place that reduces the risk of the oil reaching the shore to as low as reasonably practical.

1.9. MATERIAL ASSETS

The material assets around the transfer locations and the possible impacts the proposed transfers may have are assessed.

Material assets are grouped as follows:

- Portland Harbour Authority Jurisdiction - Users and Assets
    - Inner Harbour South including inner, outer and north-eastern breakwater -
    - Inner Harbour West and North-West including northern breakwater and Fleet entrance
    - Portland Outer Harbour (north) including Newtons Cove and the Nothe
    - Portland Outer Harbour (south) including Balaclava Bay and Grove Point
- Portland Harbour Surroundings – Users and Assets (i.e. adjacent and Nearby Areas to Jurisdiction)
    - Chesil Beach and Fleet Lagoon European Marine Site
    - Weymouth Harbour Authority Jurisdiction (Inner and Outer Harbour)
    - Weymouth Bay extending from Portland Bill to Lulworth Cove

Examples of the types of assets found locally and include: breakwaters, berths, jetties, piers and slipways, anchorages, landside public access, multi-use waterspace, marinas, boatyard, sailing academy/ watersports centre, military, mooring areas and slipways for small yachts, bathing waters, fishing and aquaculture with examples including mussels, oysters and scallops fisheries, diving sites/ wrecks, nature conservation, landscape and geological sites.

1.10. CULTURAL HERITAGE

This chapter considers cultural heritage assets including listed buildings, scheduled monuments and protected wrecks, and potential impact from the transfer operations.

Portland Harbour and Weymouth Bay lies within the Dorset and East Devon Coast World Heritage site (also known as the Jurassic Coast). This is discussed in Chapter 8, Landscape because of the geological and landscape interest.

The proposed transfer operation is taking place in existing operational locations so does not pose an additional impact over and above existing operations. In the unlikely event of an oil spill, it may lead to damage, and reduced access to cultural heritage assets within the area.

A robust system of management measures has been designed to ensure the likelihood of an accidental oil spill is as low as reasonably practical, and in the unlikely event of an oil spill a response team is in place to respond such that the risk of a product reaching the shoreline is also as low as reasonably practical.

It is therefore possible to conclude no significant impact on cultural assets.

1.11. MEASURES

Portland Harbour Authority compliance with the Port Marine Safety Code and it's Safety Management System has been discussed in Chapter 4. This chapter considers the measures that would be adopted in connection an oil ship to ship transfer operation at Portland. These are considered under a series of categories as follows:

- **Risk Assessments** – the Port has developed a navigational risk assessment specific to Ship to Ship Transfer Operations. This underpins the controls that are described in the sections that follow.
- **Notices in Force** - a local regulation in the form of a General Direction has been developed for Ship to Ship Transfer of Oil and a second one relating to Towage and Ship to Ship Transfers. The existing Local Notice to Mariners relating to Ballast Water Management will continue to apply as would the GD No 1 of 2016 would apply to bunkering and debunkering.
- **Controlled Commercial Documents –**Controlled commercial documents that apply to STS operations include certificate of approval to operate, Application Forms to undertake Transfer, Declarations of Compliance, Pre-Transfer checklists and meeting checklists, emergency contacts and training requirements.
- **Operations Manual - Standard Operating Procedures** - The standard operating procedures include ones that are specific to Ship to Ship Transfer Operations such as general measures, provision of local port services, tug operations, pilotage, pilot boats, pilots and transfer procedures and pollution response.
- **Marine Pollution Plan** - Portland Harbour Authority has updated its Plan to take account of Ship to Ship Transfer Operations. NOTE Appendix 1E of Portland Harbour Authority's Oil Spill & Marine Pollution Contingency Plan will be replaced with updated SOPE2 that forms part of the measures proposed for this operation.
- **Emergency Plan -** this document will be an important document in support of STS operations but in reviewing the operation no specific changes are proposed.

1.12. RESIDUAL EFFECTS

The environmental assessment shows that the potential unmitigated environmental effects that may arise from the proposed transfer operations were predicted to arise from movement & presence of ships, accidental oil spill and discharge of ballast water during transfer process.

Mitigation measures are identified to prevent or reduce, and where possible offset, any significant effects on the environment, and residual effects have been assessed. These are summarised as follows under the following environmental considerations specifically described in The Merchant Shipping (Ship-to-Ship Transfers) Regulations 2020:

- The nature of the activities to be carried out and the manner in which they are to be

carried out
- Use of Natural Resources
- Emissions of Pollutants
- Creation of Nuisances
- Elimination of Waste

Nature of the activities to be carried out, and the manner in which they are to be carried out – the harbour authority has put a considerable amount of effort into selecting the most appropriate locations, the nature is similar to what is already taking place, and the manner in which they will be carried is such that is done safely and to ensure the environment is protected.

Use of Natural Resources - natural resources are not being used to enable this operation to take place. It is reasonable to make a cautious assessment of residual impact on natural resources of negligible/ insignificant impact on natural resources.

Emissions of Pollutants – Water (Oil) – Hydrocarbons being released into the sea on a large scale would be likely to result in a significant negative effect on the humans and the environment. The severity of environmental damage caused by a particular oil spill depends on many factors, including the amount of the oil spilled, the type of oil, the location of the spill, the type, sensitivity and seasonality of habitats and species, and the prevailing weather during and immediately after the oil spill. The harbour authority has identified measures and incorporated these into a robust safety management system that ensures the likelihood of an accidental oil spill is as low as reasonable practical, and in the unlikely situation that an oil spill does occur, an enhanced response capability is in place for the duration of the operation such that the residual impact is considered negligible.

Emissions of Pollutants – Water (Ballast Water) - While ballast water is essential for safe and efficient modern shipping operations, it may pose serious ecological, economic and health problems due to the multitude of marine species carried in ships' ballast water. Adherence to the harbour authority's Local Notice to Mariners No 18/2017 BALLAST WATER MANAGEMENT. It is concluded that the risk identified as a measures will significantly reduce this risk so that it can be considered negligible. Acknowledgement is also given to the March to June 2021 consultation on the draft "*The Merchant Shipping (Control and Management of Ships' Ballast Water and Sediments) Regulations 2020 would introduce legislation into UK law controlling the discharge of ships ballast water into UK waters"* and the harbour authority's 'Aquatic Invasive Non-Native (Alien) Species Plan'.

Creation of Nuisances – the operation will take place in an existing anchorage and is similar in nature to a bunkering operation. The locations have been decided to reduce the risk to other users of the harbour. Planning and communication will continue to be a critical part of the ongoing management of the harbour such that all users can co-exist.

Elimination of Waste – nature of the operation is such that it does not generate a significant amount of waste. Part of the operation includes the cleaning of hoses and by using a specialist licensed company this can be managed effectively. The handling of waste in the unlikely event of an accidental spill is also a critical part of the harbour Authority's Marine Pollution and Oil Spill Contingency Plan.

In terms of cumulative effect this has been considered for each technical chapter. Of particular relevance is the temporary activity associated with cruise ships anchored in Weymouth Bay. As a precautionary measure the existing measures in place were reviewed and no changes have been made as the Bay is already used by vessels to anchor. The cumulative impact is therefore considered to be neutral.

In conclusion, implementation of the mitigation measures will reduce the risk of the proposed cargo transfers having an effect on the people and the environment such that it can be considered a negligible impact, with potential direct and indirect economic benefits from offering this new and complimentary service.

1.13. CONCLUSION

An environmental assessment has been undertaken to determine whether the oil transfers between ships are likely to have any significant effects on the environment or on any European Sites, in accordance with the Merchant Shipping (Ship-to-Ship Transfers) Regulations.

The locations and a description of the proposed cargo transfers is as follows:

- Locations of Proposed Cargo Transfers: Anchorages G6 and M6, and Queens Pier Outer Berth.
- Types of substances to be transferred: Light oils; medium oils; heavy fuel oils; Light, medium and heavy crude oils, debunkering of all types of standard and off spec bunker fuel.
- Quantities of each substance: Based on a maximum draft of 17m the largest vessel would be a Suezmax that has the capability to transfer 130,000MTs of cargo. The average quantities are anticipated to range from 35,000MT/transfer to 80,000MT/transfer based on experience elsewhere. Potential transfer quantity per annum would be 6,240,000MTs assuming 48 operations.
- Frequency of transfers: 4 operations per month is considered to be a reasonable assumption. A build up to 48 operations per annum are projected.
- Types of ship to be used to carry out the transfers: Handy size, Medium Range (MR), Panamax, Aframax also known as LR1(Long Range), Aframax with coated tanks LR2 and Suezmax as examples.

The environmental assessment shows that the potential unmitigated environmental effects that may arise from the proposed transfer operations were predicted to arise from movement & presence of ships, accidental oil spill and discharge of ballast water during transfer process.

Measures are therefore identified to prevent or reduce, and where applicable offset, any significant effects on the environment, and residual effects assessed.

In summary:

- The application for an Oil Transfer Licence is made in accordance with 8(1)(b) and Schedule 2 of the Merchant Shipping (Ship-to-Ship Transfers) Regulations 2020 Regulations.
- It follows an initial determination by the harbour authority under article 8(1)(a) and Schedule 1 of the Regulations, that the proposals would not have a significant effect on any European sites. Natural England were consulted in making this initial determination and agreed with Portland Harbour Authority's assessment.
- The deep and sheltered waters of Portland Harbour and Weymouth Bay offer a safe place for ships to visit for a variety of services
- The proposals described in this application compliment the existing on and inwater services already taking place, supporting the service providers locally and attracting new ones.
- In doing so this ensures that added resilience that sustains all year round economic activity and associated jobs.
- The harbour authority has a strong track record of managing a harbour with bunkering already taking place at the proposed anchorage locations.
- The industry has a strong track record in the development and implementation of international safety standards.
- The harbour authority has developed a series of robust measures to ensure safety and protection of the local environment
- Measures include pre, during and post operational measures comprising as examples, the auditing of service providers that would oversee the operation, and new and updated management measures that form part of the harbour authority's safety management system.
- Although the risk of accidental oil spill is low, the harbour authority has deemed it necessary, as a precautionary measure, to have an enhanced marine oil spill and marine pollution contingency

planning and response capability offering onsite 1 hour Tier 1 and Tier 2 capability, specifically designed for this operation.

- The harbour authority will continue to engage with its users through daily communications and through the harbour consultative committee to ensure that all can enjoy and use the harbour to support our daily and operational needs.

In conclusion, implementation of the measures will reduce the risk of the proposed cargo transfers having an effect on the environment such that it can be considered low risk with a negligible impact. The operation delivers upon the harbour authority's statutory responsibility to provide for the development and for the safe and efficient operation of a commercial port; for the management and encouragement of commerce, and for harbour conservancy, maintenance and management.