

PE1637/O

Port of Cromarty Firth submission of 14 January 2021

Following the meeting of the Public Petitions Committee on the 12th November 2020 regarding petition PE1637: Ship-to-ship oil transfers and trust port accountability, the Port of Cromarty Firth (PoCF) are providing the below information in response to a number of the issues which were discussed.

Complaint Reporting

PoCF received noise complaints against six events in the Cromarty Firth in 2020. The HSEQ reporting system used by PoCF records 'Noise Complaint Events' (also known as 'Non-Conformance Reports'). These relate to specific events or sources of noise which have resulted from Port-related vessel/rig activity or other operations/activities.

Historically noise complaints arise when rigs arrive or depart the Cromarty Firth. During these activities, visiting rigs are often assisted by support vessels such as anchor handlers or tugs, which can increase the noise emitted due to multiple vessels operating simultaneously. It is normal for two or three support vessels to accompany a rig in order to assist in the running of anchors and chains, therefore ensuring a safe mooring is completed. This activity can take place over several days depending on the nature of the rig being accommodated in the Cromarty Firth. Once rigs are safely moored, the associated noise generally abates. Certain noise generating activities, such as mooring operations, can result in individual stakeholders logging several complaints against this same activity.

The below table shows the recorded noise complaint events which PoCF received in 2020. As previously mentioned, these have been recorded against six main events linked to rig/vessel activity. Within these six events, multiple complaints have been logged by the same individual/stakeholder and are recorded against the noise event which they relate to. For the avoidance of doubt, in 2020 the total number of individuals complaining was nine - four individuals from Cromarty (accounting for 18 complaints) and five individuals from Invergordon (accounting for five complaints). Whilst one complaint is one complaint too many from a PoCF perspective, it's important to note that of the circa. 18,000 residents surrounding the Cromarty Firth, the nine individuals logging complaints with PoCF accounts for 0.05% of the local community population.

	Noise Complaint Event / Source	Number of Complainants	Number of complaints recorded against same event	Location of Complainant
1	Maersk Resilient	3 Stakeholders	3 Complaints	Invergordon
2	Paul B Lloyd Junior	4 Stakeholders	12 Complaints	Cromarty

3	Transocean Leader	2 Stakeholders	3 Complaints	Cromarty
4	Noble Sam Hartley	2 Stakeholders	2 Complaints	Invergordon
5	AHTV GH Endurance / EnQuest Producer	2 Stakeholders	2 Complaints	Cromarty
6	Global Energy Group / Moray East Offshore Windfarm	1 Stakeholder	1 Complaints	Cromarty

This is the reporting approach which PoCF has adopted to record noise complaints, however if an alternative approach is deemed to be more appropriate then PoCF will consider that methodology and make any necessary changes. It should be noted that the Highland Council may receive complaints directly which are not received by PoCF (and vice versa), therefore the same number of complaints may not necessarily be recorded.

PoCF operates a robust system and procedure to manage noise complaints when they are formally received. The complaint is recorded within our HSEQ database and a follow-up communication takes place directly with the complainant (if requested). The operator of the associated vessel/rig is advised to reduce noise-generating activity as far as practicable and to remain within the legal limits. If a pattern of complaints have been received regarding an operation or vessel, PoCF try to identify proactive measures to mitigate against excessive noise being generated. Examples of these measures include requesting acoustic baffles to be fitted and mooring assets so that the exhaust direction is away from communities.

PoCF have invested in staff training and equipment to carry out noise monitoring following noise complaints. Tests completed in 2020 found all noise levels to be within the legal limits. We are aware that the Highland Council's Environment Services Department offered to complete noise monitoring in the Cromarty area, however we are unaware of the results or if the complainant(s) agreed to have the Highland Council undertake this monitoring.