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Matt Hoffman,  
Environment Southland,  
Prices Road,  
Invercargill.

31<sup>st</sup> May 2016

Dear Matt

**Re: Island Escape Cruises Ltd (IECL) – S 92 Response for application for a coastal permit to undertake surface water activities**

Thank you for your letter of 20<sup>th</sup> May outlining Environment Southland's S92 request for further information. IECL's response to your questions are provided below:

**1. Scale and Nature of the consent**

The consent period applied for is ~18 years, expiring the same date as the current IECL permit for the Northern Sounds (Permit # 302129), which expires on 9<sup>th</sup> September 2033.

Charter cruise trips are normally of one-week duration. The maximum number per annum would therefore be 52.

Unfortunately, there is no definitive design of the 49 metre vessel available. Previous designs were conceptual only. However, it can be said that any new vessel operated by IECL would be of similar design to the MV "Island Passage" i.e. a multihull vessel with 2-3 upper decks and a helipad.

A photo of the MV "Island Passage" in George Sound is provided in Figure 1.

**2. Description of the Environment**

The following is a description of the features of the environment in which the proposed vessel intends to operate, both on water and on the adjacent shore, extracted from the Fiordland National Park Management Plan:

*Fiordland is renowned for its combination of glaciated mountain landforms, remote coastline indented by fiords, vast extent of natural flora, and diverse and abundant wildlife. The essence of Fiordland is water. Water has had a major role in shaping the character of Fiordland, and continues to do so. Glaciers of past ages have carved out the sheer and rugged landform. Water now permeates the landscape in the form of lakes, rivers and ocean; also snowfields and rain. Dominant are the great lakes and rivers on the eastern border, and the 14 fiords in the west.*

*While the waterways of coastal Fiordland are referred to as "sounds", they are "fiords". Fiords are found in only a few places around the world. They occur on coasts where past*

*glaciation has eroded the land to below sea level. When the glaciers retreated the sea occupied the valleys they had made.*



**Figure 1.** MV “Island Passage in George Sound

*The Fiordland coast, with mountains rising up to 2000 m directly from the sea along the Alpine Fault, forms a barrier to strong westerly winds, which travel across the Southern Ocean and Tasman Sea. The abrupt obstruction causes a very wet, vigorous climate. There is a strong climatic gradient across Fiordland with yearly rainfall reducing from about 6000 mm in the west, to about 1200 mm at the eastern boundary of Fiordland National Park.*

*The long Fiordland coastline has a great variety of coastal environments. The steep-sided fiords support marine species unique in the world. Species composition is largely influenced by the patterns of water circulation that develop in the fiords. After heavy rain in Fiordland, a dark brackish layer of fresh water (from river inflows) floats over the seawater. This layer filters the sunlight and creates very dark but clean marine habitats at quite shallow depths. It is for this reason that black coral can be found at shallow depths.*

*The Fiordland shore comprises not only steep fiord walls but also river deltas at the heads of the fiords which include muddy inter-tidal flats. On the outer ocean coast some beaches are backed by forested sand dunes, though most of the shore is rocky.*

The natural resources of the Western Sounds are significant to Ngai Tahu. It is important that visitors to the area respect this, and do not overharvest these resources for their own use. Accordingly, IECL shall prohibit the taking of mahingakai (including seafood) off the vessel for home use. Seafood may only be harvested for personal use while accommodated on the MV “Island Passage”.

Trout fishing may occur in some estuaries. There is no season, so fishing may be done on a year-round basis. The bag limit is 4.

Diving for crayfish, scallops and paua is popular in some parts of the coastal waters of Fiordland. However, IECL is aware that overharvesting of these species is a threat to the delicate marine ecosystems in these areas, and has strict policy of limiting catches to personal on-board use only (i.e. no harvested seafood may be taken off the vessel at the end of the cruise). Temperate, subtropical, deep and shallow water species all exist because of the freshwater layer and small temperature range. Viewing black coral colonies, sea fans and other marine life in this environment can be very rewarding to divers.

Historic sites occur particularly at Richard Henry's House Site, Astronomer Point and Luncheon Cove. There is also a number of historic sites in Preservation Inlet, including Cromarty Village and Puyseger Point lighthouse, These are all relatively popular places for private and commercial tourists to visit. Other recreational activities which generally may occur in the application area include recreational hunting, birdwatching and recreational boating.

### **3. Effects on Visual Amenity, Natural Character, Remoteness and Wilderness values.**

It is recognised that there are potential effects on the wider public who use the coastal marine areas of Fiordland. These may include commercial fishermen, recreational fishermen, other charter companies and persons engaged in private recreational pursuits.

In his evidence to the Environment Court in July 2006, Mr Allan Rackham, a landscape architect, discussed commercial charters in Doubtful Sound. The potential effects of charter cruises are described in some detail in this evidence by Mr Rackham. No similar analysis of the Southern Sounds was provided, but for the purposes of this assessment it is assumed that the effects would be similar to Doubtful Sound. Mr Rackham considered the effects of charter cruises on natural character and visual amenity to be associated with the Fiordland 'landscapes'. His evidence states:

*Fiordland, of any mainland New Zealand landscape, is an area where the values associated with natural character, outstanding natural features and landscape, and amenity are most inextricably and seamlessly linked. The extraordinary high degree of natural character is the most predominant contributor to the outstanding qualities of the landscape. Amenity values such as the areas' exceptional aesthetic coherence, its tranquillity, remoteness and wilderness qualities are all contingent on the naturalness of its landscapes. Consequently, rather than address these issues separately, I now consider the suite of 'landscape' issues and assess potential effects for each of the areas of the Doubtful Sound Complex.*

Mr Rackham considered a number of potential effects of commercial boating activity on 'landscape' issues to include: "*the introduction of litter or other undesirable flotsam and jetsam...*". The AEE and this letter (Section 5) provides information on how this effect will be avoided.

Mr Rackham also considered other landscape effects such as:

*“The temporary presence of a boat may change the experience of natural character and landscape quality and reduce amenity values for any other people in the vicinity. The extent ... will depend on a number of considerations including the size and colour of the boat, the noise from the boat, any lights – particularly at night, any smells from the boat eg. fuel, the period of time the boat is present, and its proximity and prominence to the viewer. The 'expectations' and 'sensitivity' of the viewer will also be key considerations in determining the level of effects on their experience.”*

Regarding the size and colour of the boat, the MV “Island Passage” is of a similar size to other charter boats operating in this area. The MV “Island Passage” also has a low silhouette in the water (see Figure 1), so is not as easily seen from a distance as other boats of a similar size. In addition, many larger cruise ships visit the inland waters of Fiordland each summer. They are considerably larger and more visually intrusive than the MV “Island Passage”. The colour of the MV “Island Passage” is also similar to other charter cruise boats operating in this area. The tender boats and kayaks are considerably smaller than the main vessel, and less likely to be noticed.

Regarding noise, lights (particularly at night), smells from the boat (eg. fuel) etc, these effects are discussed in the AEE and in later sections of this letter.

Regarding the expectations and sensitivity of viewers in the application area, the existing degree of natural character needs to be assessed. While the inland waters of Fiordland have an extremely high degree of natural character, there are many mooring and craypot buoys in the Sounds, along with a trampers hut at Supper Cove. These all give an impression of an area which is regularly visited by commercial fishermen, and (in the case of Supper Cove) recreational trampers.

The temporary presence of boats such as the MV “Island Passage” and the tender boats can adversely affect the natural character, but this does not permanently reduce the naturalness of a piece of coast, whereas something like a permanent mooring buoy or hut would. A boat will only affect natural character during the period of the boat's presence. Furthermore, visitors to the application area are most likely to be boaties themselves.

IECL Ltd is however mindful of the potential effects of the MV “Island Passage” and associated tender boats operating in the Southern Sounds during the spring/summer months. Mitigation for this is proposed as follows:

- No overnight camping out or use of huts will be undertaken by passengers.
- Where other park users are encountered, IECL passengers will avoid interaction and ensure priority to these users.
- While the “MV Island Passage” will need to carry three tender craft (as one of these is required for survey requirements), only two will be allowed in the water at any one time. Of these two, one may only be used when kayaks are in the water, to oversee kayaking operations for safety purposes.
- Areas where trampers on walking tracks can access the application area are limited to Supper Cove in Dusky Sound. To preserve the sense of isolation for these visitors, the “MV Island Passage” will not anchor within sight of this area.

- Furthermore, tender vessels shall only come within sight of this area for the purposes of transferring shore visitors for walks, and not for fishing, diving or general touring etc. Kayaks will not be used in Supper Cove.

It should be noted that IECL provides for a specific clientele not catered by other consented charter operators. Those people wishing to experience the Fiordland coastline have a choice of going there by private boat, aircraft or commercial charter vessel. If a suitable commercial charter vessel is not available, then the only other options are private boat or aircraft. IECL is therefore providing a positive effect in that it potentially reduces the numbers of private vessels and aircraft over-flights which may otherwise occur in the application area.

#### **4. Biosecurity**

Current consent conditions require checking the hull prior to entering Fiordland waters on each occasion, and again 6 weeks thereafter. In addition, consent conditions include treating equipment on board to kill unwanted organisms. The vessel hull is inspected in Auckland, immediately prior to travelling to Fiordland. If necessary, the vessel hull is re-inspected in Nelson, en route to Fiordland. The vessel hull will be scraped clean of any fouling organisms, by an experienced diver, during these inspections.

The biosecurity conditions of this consent have been in operation for the last three years. These conditions are considered suitable for the purposes of the Southern Sounds as well. They are listed below. In addition, IECL is aware of the “Fiordland Pathways” initiative currently being considered by Environment Southland, in conjunction with the Fiordland Marine Guardians. IECL will comply with any new biosecurity regulations which result from their deliberations.

##### Biosecurity

14. (a) The consent holder shall inspect the hull of any vessel operating pursuant to this consent for pests and fouling organisms, in particular *Undaria*, prior to entering the internal waters of Fiordland on each occasion, and again after a six week period to check for new growth. If such organisms are found the consent holder shall notify the Council’s Compliance Manager prior to removal and disposal of the pests or organisms to a designated refuse site on land.
- (b) To comply with Condition 14(a), the consent holder shall, prior to entering the internal waters of Fiordland on each occasion, ensure all buoys are thoroughly dried prior to use, with all mooring ropes and other equipment that may have come into contact with coastal waters immersed in a 5% solution of bleach or acetic acid (i.e. vinegar) for 24 hours, to kill any unwanted organisms.
- (c) The consent holder shall maintain:
- (i) the vessel in a rodent free state while operating in the internal waters of Fiordland; and
  - (ii) at least one bait station on the vessel at all times.

In particular, the consent holder shall inspect the vessel operating pursuant to this consent, including its compartments and any cargo, for pests, in particular, rodents, on each occasion of operating, and prior to re-entering the coastal waters of Fiordland on each occasion.

#### **5. Rubbish, sewage and noise**

##### *Noise Effects*

The sense of isolation and special wilderness values of the area are easily destroyed by human-induced noise. An assessment of non-human background noise is difficult in this

environment, as it varies a great deal depending on weather and other environmental factors. However, it can be said that the background noise level is characteristic of a pristine wilderness and should not be intruded upon. Therefore, IECL has implemented measures to keep the generation of noise to an absolute minimum.

Noise readings of the MV “Island Passage” have been measured and assessed in accordance with the provisions of NZS 6801:1991 “Measurement of Sound” and NZS 6802:1991 “Assessment of Sound”.

These readings are within the Fiordland National Park Management Plan guidelines for noise from boating vessels on water-bodies within Fiordland National Park (should not exceed 77 dB(A) (Lmax).

Tender boats are powered by the Yamaha F200A, a smaller twin of the F225A, which utilises the same Yamaha electronic fuel injection system as the F115A and F225A to achieve clean emissions and stable low speed idling. These are the quietest outboard motors available on the market today. Other main features include power delivery throughout the rev range and a lack of vibration and noise at any speed.

Manufacturer’s noise ratings for the Yamaha 4 stroke 200 Hp engines are available. The Yamaha F200A is known as the quietest outboard motor currently available. Noise ratings for the Yamaha F200A are provided below, along with comparable noise ratings for the Mercury Optimax 200:

Make/Model	RPM	Noise rating
Mercury Optimax 200	550 (idling)	68.5 dB(A)
Mercury Optimax 200	5900 (full throttle)	95.5 dB(A)
Yamaha F200A	700 (idling)	60.0 dB(A)
Yamaha F200A	5650 (full throttle)	85.5 dB(A)

Manufacturers noise ratings for the twin Kelvin Marine TASC8 diesel engines are not immediately available. However, it is expected that they will be within normal acceptable noise levels, as the “MV Island Passage” has recently passed its annual survey with a 10/10 environmental rating.

While the MV “Island Passage” has a public-address system for passenger safety announcements etc, and hi-fi equipment, it is not envisaged that these will be extensively used while on charter in Fiordland. A significant part of the tourist experience in this area is the sense of remoteness and quietness, and IECL will be promoting the “quietness aspect” of the charter cruises. It is not expected that passengers will wish to spoil this through the generation of excessive and/or unnecessary sound.

### ***Sewage Treatment***

All waste water, including grey and black water, flows into the holding tank. When the sewage reaches a designated start level the sewage treatment plant starts operating, using a continuous flow through operation.

After going through a macerator pump the sewage passes into a reaction chamber where it is mixed with Sodium Hypochlorite from the dosing pump. Through the mixture of the oxygen in the sewage water and the chlorine, oxidation of the organic particles occurs and all bacteria are destroyed.

With further reaction time in a whirl chamber the treated sewage flowing out becomes a completely sterile solution according to standards set by IMO, USCG and the European certification authorities.

The treatment system is fully compliant with the Resource Management (Marine Pollution) Regulations 1998, as evidenced by IECL operating the same system in the Northern Sounds for the last three years.

### ***Rubbish***

All boat waste will be stored on-board, and disposed of in a sanitary landfill outside the National Park/ Sounds area. The vessel has capacity to store rubbish for over three weeks on-board. As charter cruises are for one week, this is not expected to be a problem. A full description of the Garbage waste management is detailed in the Island Passage Safe Ship Management manual (as below).

#### GARBAGE MANAGEMENT

It will be the policy of the vessel to exceed set International Policy Regulations as set out by the MARPOL 73/78 convention, Annex V and upheld by Maritime New Zealand for the correct disposal of garbage at sea.

Stickers explaining the regulations and subsequent responsibilities will be posted in relevant spaces throughout the vessel.

The galley has a hard waste compactor. All hard waste will be removed ashore and recorded in the Garbage management folder.

It will be the vessel policy to recycle all appropriate glass and plastics and to remove these ashore to an accepted recycling station. All recyclable glass and plastics removed ashore will be recorded in the Garbage management folder.

Passengers will be briefed on the correct disposal of garbage onboard.

### **6. Safety and Hazards**

For fishing, diving and kayaking activities, all passengers are briefed on safety issues by a qualified crew member prior to undertaking these. For fishing from tender boats, and kayaking, life jackets are worn at all times. All fishing and diving activities are personally supervised by crew members. Kayaking activities are supervised by a tender boat, which is launched specifically for the purpose of kayak supervision.

A copy of the report on seagoing trials is provided as Appendix 1

All hazardous chemicals are stored on board in banded compartments, as pictured in Figure 2 below. Any spillage from containers is confined to these compartments, and cannot escape from the vessel.



**Figure 2:** Bunded compartments for storage of hazardous chemicals etc.

Oil spill contingency and management procedures are listed in Appendix 2 (from the MV Island Passage Safe Ship Management Plan). The risk of fuel spillage from the MV “Island Passage”, and associated tender boats, has been surveyed by the Maritime Safety Authority. Their assessment rates this risk as “low”.

## **7. Policy Assessment**

### **7.1 Resource Management Act**

The Resource Management Act Part 2 provides the Purpose and Principles of the Act, and matters to be considered when assessing an application for resource consent. Section 5 (2) defines sustainable management, including a requirement to avoid, remedy or mitigate any adverse effects of the activity on the environment. This application is consistent with the purpose and the principles of the Act, as set out in Section 5. The proposed activity will have no more than minor adverse effects on the ability of the receiving environment to meet the reasonably foreseeable needs of future generations, or on the life-supporting capacity of any ecosystem. Proposed mitigation will ensure that any potential adverse effects of the activity will be avoided, remedied or mitigated to the extent where they are no more than minor. Therefore, this application is consistent with this section of the Resource Management Act.

Section 6 lists matters of national importance, including (a) the preservation of the natural character of the coastal environment (including the coastal marine area), and (b) the protection of outstanding natural features and landscapes from inappropriate use, and development.

Section 6(a) is of particular relevance to this application. Whether the commercial surface water activity is inappropriate for the area is, to a certain extent, subjective; especially as



subsection 6(d) states that recognition should also be given to the maintenance and enhancement of public access along the coastal marine area. Furthermore, there are only a few activities of this nature operating in the southern sounds. Section 3 of this letter discussed this aspect, and concludes that the mitigation offered will ensure that any adverse effects are no more than minor. This application is therefore consistent with Section 6(a).

Cultural and traditional relationships that Maori have with coastal water resources (Subsection 6(e)) within Fiordland are also recognised, particularly as Ngāi Tahu's association with the Fiordland coastal marine area is recognised under the Ngāi Tahu Claims Settlement Act. Mr Rewi Anglem of Ngai Tahu has previously accompanied the vessel in the Southern Sounds during sea trials in 2008, and he has advised on cultural issues and protocols for operating in this area, which are now incorporated into normal IECL operations elsewhere in Fiordland. This application is therefore consistent with this section of the Resource Management Act.

Of the matters listed in Section 7 of the RMA, subsections 7(c) and (g) are particularly relevant to this application. These subsections state that particular regard shall be given to maintenance and enhancement of amenity values, and the finite characteristics of natural and physical resources. The aesthetic coherence, cultural and recreational attributes of the natural and physical characteristics of the area, are important amenity aspects to have regard to. These are all discussed in the application, and in Sections 3,4,5 and 6 of this letter. It is concluded that the scale and nature of this activity, along with the mitigation and suggested conditions, make this application consistent with these sections of the Resource Management Act.

## **7.2 New Zealand Coastal Policy Statement**

Objectives 2 and 4, and policies 6 and 13 of the New Zealand Coastal Policy Statement are of relevance to this application. Policy 6 requires consideration of a number of matters, including visual effects, but also recognises the need to maintain and enhance the public open space and recreation qualities of the coastal marine area. Policy 13 is to preserve the natural character of the coastal environment. The policy also recognises that natural character includes a range, from pristine to modified. These issues are discussed further in Section 3 of this letter. It is considered that the mitigations offered by the applicant will ensure that any adverse effects will be no more than minor, and hence this application is consistent with the New Zealand Coastal Policy Statement.

## **7.3 Regional Policy Statement**

Effects from the proposed variation will be no different in scale, nature or intensity from those already authorised, therefore the application is not contrary to any of the relevant objections or policies of the Regional Policy Statement. The application is also not contrary to any of the relevant objectives and policies of the Proposed Regional Policy Statement, as any adverse environmental effects from the proposed variation will be no different in scale, nature or intensity from those already authorised for other commercial charter vessels in the application area. Therefore, this application is consistent with the Regional Policy Statement.

The Department of Conservation's Fiordland National Park Management Plan 2007 (FNPMP) is relevant to Policy 13.10 of the Regional Policy Statement. The Management

Plan is relevant and reasonably necessary to the determination of this application because of the proximity and association with the Fiordland National Park. Because it is a plan to manage the National Park, it does not impact directly on commercial surface water activities. However, the degree of protection given to the land areas adjacent to the fiords, particularly in regard to remoteness and wilderness values, may be of concern to Department of Conservation.

The FNPMP seeks to provide for recreational activities in the fiords, while limiting commercial operations, in order to sustain wilderness recreational opportunities. Regarding this, the application is consistent with the National Parks Act if the cumulative effect of commercial surface water activities do not detract from the natural character of the park. Section 3 of this letter assesses this, and concludes that the proposed mitigation makes any actual, potential and/or cumulative effects on these values no more than minor. Therefore, this application is consistent with Policy 13.10 of the Regional Policy Statement.

#### **7.4 Regional Coastal Plan**

The Southland Regional Coastal Plan contains objectives, policies and rules for commercial surface water activity in the inland waters of Fiordland. The policies of Te Tangi a Taura generally seek to protect and preserve the coastal environment. Policies 3.6.6.1, 3.6.6.2 and 3.6.6.6 focus on reducing the impact of commercial surface water activities on the coastal environment and seek to protect the natural character of the environment from these activities. These are general policies, which the application is broadly consistent with.

Objectives 16.1.1, 16.1.2 & 16.1.3 all seek to ensure that surface water activities do not impinge on wilderness, natural character and the unique intrinsic values of Fiordland. Section 3 of this letter discusses in detail how any effects of this activity will be mitigated to the extent where any actual or potential effects on these values are no more than minor. This application is therefore consistent with these objectives, especially Objective 16.1.3 which states “...users should conduct their activities in a manner that avoids adverse effects on each other and the environmental conditions that attract them to the area.”

Policy 16.2.2 of the Regional Coastal Plan seeks to:

*Limit the extent and number of commercial activities that occur within the coastal marine area of Fiordland to a level which does not reduce natural character, landscape and amenity values, specifically remoteness and tranquillity values.*

Such limits have been placed on some areas of Doubtful Sound, where boat traffic is impinging on these values (Policy 16.2.3). No similar limits have been placed on the application area, and the mitigations offered in Section 3 of this letter, mean that this application is not constrained by this Policy.

Policy 16.2.8 of the Regional Coastal Plan states:

*Protect the opportunity for remoteness and wilderness experiences in all of the principle Arms, Inlets and Fiords of Fiordland apart from Milford Sound.*

The only land-based opportunity for wilderness appreciation is the walking track at Supper Cove. This application contains measures to restrict boat activity in Supper Cove to the extent that any effect on wilderness values in this location are no more than minor. Sections 3 and 5 (noise effects) of this letter discusses additional mitigation of the effects of this activity of wilderness and remoteness values. Hence, this application is consistent with Policy 16.2.8.

The objectives and policies of the Regional Coastal Plan are mirrored by the Rules which provide the statutory environment for operations of this type. Rule 16.2.1 (7) states:

*... it is a discretionary activity to undertake any commercial surface water activities in the internal waters of Fiordland from Yates Point to Puysegur Point.*

This application is for charter cruises within the internal waters from Febrero Point to Puysegur Point. The activity applied for is therefore discretionary under Rule 16.2.1 (7) of the Regional Coastal Plan.

## **7.5 Conclusion**

This application is for commercial multi-night charter cruises by a commercial vessel of up to 49 metres registered length in the inland coastal waters of Northern Fiordland, from Febrero Point to Puysegur Point. The activity is undertaken in the marine and costal area.

IECL has been operating in similar areas in the Northern Sounds of Fiordland under very similar circumstances since 2013, with no reported adverse effects occurring from these activities. Therefore, it is fair to say that the proposed activity in the Southern Sounds, conducted under the same terms and conditions, will cause no adverse effects which are more than minor.

This application is therefore consistent with the relevant provisions of Part 2 of the Resource Management Act 1991, the National Coastal Policy Statement, Regional Policy Statement for Southland and the Regional Coastal Plan for Southland, and is a discretionary activity under Rule 16.2.1 (7) of the Regional Coastal Plan

Yours faithfully



Bill Chisholm  
For ISLAND ESCAPE CRUISES LTD

## Appendix 1

43 Raeburn Ave,  
Otatara,  
Invercargill.

Ph (027) 241 0799

28<sup>th</sup> August 2008

Mr Kevin O'Sullivan,  
Environment Southland,  
Private Bag 90116,  
Invercargill.

Dear Sir

### Re: MV "Island Passage" Fiordland 23<sup>rd</sup> to 28<sup>th</sup> August 2008

Between the 23<sup>rd</sup> and 28<sup>th</sup> August 2008 I acted as Pilot on board MV Island Passage during her voyage to Fiordland.

The vessel transited the following Sounds:-

Milford  
Poison Bay  
Thomson  
Doubtful  
Breaksea  
Dusky  
Chalky  
Preservation

During this period we visited numerous areas within the Sounds investigating various anchorages and actually anchored in many of these for both day and overnight stops. An extensive exploration was made within various arms and coves. This exploration was both to familiarize the ships' officers and crew in safe navigation and various weather anchorages.

It should be noted that the "Island Passage" is a small (42m) highly maneuverable vessel with twin engines and bow thruster. I observed all relevant watch keepers "conning" the vessel and bringing her up to an anchorage. All showed to be skilled and competent in handling the vessel. They also followed their passage plan and any deviation was discussed with myself and made aware to the rest of the bridge team.

The professional attitude of the officers and crew was of the highest standard in both seamanship and safety.

It is my professional opinion that the relevant officers on board this vessel are of a standard that exemption from pilotage should be issued. Full account should be taken of the aforementioned regarding the size and type of vessel and the vessel's tonnage with the pending change to Rule 90.

Yours faithfully

John Henderson

Cc: Paul Mabee, Patrick Foot, Mike Delamore

## SHIPBOARD MARINE OIL SPILL CONTINGENCY PLAN AND CHECKLIST

### 1. MINIMISE SPILLAGE

- Shut down pump
- Close valves
- Check tank levels
- Transfer excess fuel to a tank with free capacity

### 2. CONTAIN SPILLAGE

- 
- Sound alarm
- Run out fire fighting gear
- Prevent oil entering sea
- Block scuppers
- Dam around breather with sand
- Soak up spill with sand/absorbent material
- Place oil soaked material in secure container for disposal ashore

### 3. RECORD AND REPORT

- 
- Log in OLB and oil record book
- Fill out MSA incident form
- Report to appropriate authority ashore

## **Take steps to prevent event occurring again**

### **PUMPS AND FILTERS**

- Fixed installation pumps are generally serviced monthly by professional companies. Signed proof of such servicing is accepted as sufficient control that the pumps are serviceable. This does not negate the requirement to carry out the normal fuel cleanliness and water checks.

### **DRUMS**

- All drums are to be stored on their side. Maximum storage six months or the use-by date stamped on them. Water Test as above prior to use.

### **FUEL TANKER**

- A monthly check of nozzles, hoses, bonding straps and general security is to be carried out. This will be monitored through the Operations Checklist.
- After filling, prior to leaving the Base and before use on a daily basis a water test is to be carried out.

### **FUEL SPILLAGE**

- When fuel is spilled immediate action must be taken to cover the fuel with sand, sawdust, dry earth or an agent such as foam or dry chemical extinguisher powder to reduce the fire hazard.

## **MV ISLAND PASSAGE**

## **POLLUTION CONTROL PLAN**

### **OILY BILGE WATER**

- Any oil leaks minimised and repaired as soon as possible
- When at sea - pumped into 200l holding tanks in each engine room and disposed of when alongside
- When alongside – Pumped direct to shore side road tanker