

The Association for the Protection of Rural Scotland objects to the application for ship-to-ship oil transfers in the Cromarty Firth, for the following reasons:

- 1 The Moray Firth hosts one of the most important bottlenose dolphin populations in Europe.
- 2 The proposed oil transfers will occur within the Moray Firth bottlenose dolphin Special Area of Conservation (SAC), a European Union designation which recognises the international importance of this European protected species.
- 3 The proposed site is close to several other SACs for seals, seabirds and other species, and the the outer Moray Firth is a proposed SAC for harbour porpoises.
- 4 Any oil spill could seriously damage this internationally important dolphin population and other important protected species.
5. The proposed mitigation measures are insufficient to ensure that there would be no significant effects on the SAC in the event of an oil spill; the proposal is therefore contrary to the EU Habitats Regulation.
- 6 No potential alternative sites have been considered, rendering it impossible to enable a strategic approach to be taken to identifying the potential site or sites with the least environmental impacts.
- 7 Dolphin tourism is worth millions of pounds per annum to the local economy; the benefits this brings to many people in the area would be put at significant risk by this proposal.

It is simply too great a risk to the local environment and economy to carry out oil transfers in the open sea, particularly in such a sensitive area as the Cromarty Firth. If these transfers are genuinely necessary, they should only take place in sheltered harbour locations in order to minimise the risk of oil spills.

Please contact me if you require any further information or clarification. Please keep me informed as to the progress of this application.

Yours faithfully

John Mayhew
Director