

Submission to Net Zero, Energy and Transport Committee

Petition 1872

This submission is a critical appraisal of the submissions of the Messrs Dey and Mackison to the NZETC regarding Petition 1872:- *Calling on the Scottish Parliament to urge the Scottish Government to urgently ensure that all Islanders have access to reliable ferry services.*

Personal Background

I am a permanent resident of Tiree, i.e. ferry dependent. I am a retired shipping professional. In 2017 I submitted a paper to the Scottish Government-Transport Scotland's Expert Ferry Group titled '*Norway: Ferry review. What Scottish ferry Provision Can Learn.*'

Introduction

Fundamental to understanding the current Clyde and Hebrides Ferry Service (CHFS) ferry malaise, is an awareness that its root cause has been Scottish Government's failure to invest in its [2013 Ferry Plan \(FP\)](#).

Vessel Replacement Programme

Timeframe	Proposal	Estimated Timing	Estimated Funding
Short-term	<ul style="list-style-type: none">•Purchase 2 Hybrid Vessels•Secure new Stornoway-Ullapool vessel	Current	£63 m
Medium-term	<ul style="list-style-type: none">•Replace MV Isle of Cumbrae•Replace MV Hebridean Isles	To 2016	£45 m
Long-term	<ul style="list-style-type: none">•Replace MV Isle of Arran•Replace MV Loch Linnhe•Replace MV Loch Riddon•Replace Isle of Mull	To 2019	£90 m
	<ul style="list-style-type: none">•Replace MV Lord of the Isles•Replace MV Loch Fyne•Replace MV Loch Dunvegan•Replace MV Caledonian Isles•Replace Loch Tarbert•Replace MV Loch Buie	To 2025	£97 m

Currently not a single ferry in the 2013 Ferry plan has been replaced. This Ferry Plan, if implemented, would have eliminated, by any international shipping standards, what is now a gravely over-aged fleet i.e. 30 years plus. Among the current ferries, most will be approaching 40 years old on replacement. In the same period, all Norwegian ferry operators have, de facto, renewed their ferry fleets, embracing 'zero-carbon' from 2017, with a transition from LNG (Liquefied Natural Gas) to hybrid/all electric/hydrogen (one company, since 2017, has delivered 25 new ferries/ 2500 cars into its network, which is approximately 3 times bigger, by traffic volume, than the CHFS network.

Current identifiable ferry replacement planning by 2025, if funded, no longer accords to this Ferry Plan. The existing ferry replacement funding commitment to 2026 has a £44m-£200m short-fall. Scottish Government/Transport Scotland does not dispute this figure.

£250-£300m ferry replacement funding will be required in 2026-30 to deliver, five years late, the original 2013 Clyde and Hebrides Ferry Service Ferry Plan. There is a ticking time bomb regarding Northern Isles Ferries with regard to freight ferry replacement.

The New Islay Ferry (NIF) i.e. replacement of MF Hebridean Isles (built 1985) has yet to be ordered. A positive outcome of the current NIF tendering process may deliver the NIF, in-service, late 2024/early 2025.

Replacement of the MF Isle of Arran (built 1983) is the ill-fated H801 from Fergusons Marine (FMPG). Delivery second half of 2022 is prejudiced by the latest delays at FMPG.

Replacement of the MF Hebrides was not in the Ferry Plan. She was to be re-deployed to Mull on delivery of H802 circa the second half of 2023. Her redeployment to Mull as per all Vessel Replacement and Deployment Plans (VRDP) 2015 (including the latest one !!) has been abandoned, as Scottish Government-Transport Scotland has failed, since 2013, to finance the required development at Craignure.

Replacement of MF Isle of Mull (Built 1987) is now conceptual for circa 2027, i.e. minimum 8 years later than the Ferry Plan.

Replacement of MF Caledonian Isles (Built 1993) and MF Lord of the Isles (Built 1986) are now off the radar.

Caledonian Maritime Assets Ltd (CMAL), in April 2014, published its 10 year Strategic Plan 2014-2024 which reflected the Scottish Government's 2013 Ferry Plan.

The Scottish Government, in August 2014, abandoned its Ferry Plan to facilitate the ill-fated 'rescue' of Fergusons.

The Scottish Government, in late 2020 produced its Infrastructure Plan through to 2026, pledging £580m to ferry and ferry infrastructure of which £281m is earmarked for new ferries. This is partially reflected in CMAL's subsequent [3 year Corporate Plan 2021-2024](#).

I have identified a shortfall of between £44m-£200m in new ferry funding required to fund CMAL's Plan. I have advised Scottish Government-Transport Scotland accordingly. Scottish Government-Transport Scotland, in their response have not disputed this funding shortfall.

Scottish Government-Transport Scotland since 2013 have consistently failed to commit the level of funding required to offer islanders a reliable and resilient ferry service. As a consequence, the management of CMAL and CalMac have been reduced to endeavouring to make a silk purse out of a sow's ear.

Response to Messrs Dey's submission as below

1. Whether there has been an assessment of the impact the disruption has had on island economies and on islanders' access to health and social care.

The Minister's response does not answer the Convener's Question!

The reference to the New Islay Ferry (NIF) is testimony to Scottish Government's Ferry failure. It was supposed to be delivered by 2016 (see 2013 Ferry plan). This would have dictated initiating the new-build pre-tender process within 2013 or first half of 2014 at the latest. This did not happen. Notwithstanding any number of subsequent Scottish Government-Transport Scotland undertakings, reports, statements, two Islay Ferry Summits (attended by Ministers/MSPs /MPs and a veritable WHO's WHO of Scottish Ferry cognoscenti, CMAL Corporate Plans etc, the order has yet to be placed. Why such an attritional process?

In November 2020, CMAL advised the NIF was planned for delivery for winter 2023. Progress stalled. Currently, and this has to be predicated with the ferry ordered by end of Quarter 1 of 2022, in-service delivery of any New Islay Ferry will at best, be winter 2024-25

If the Minister, or any member of the NZET Committee was a ferry dependent island resident, this response is mere platitude.

Regarding the Minister's response on medical appointments, etc, shows a lack of accuracy and awareness of the reality with specific regard to medical bookings. This a standard booking facility. Islanders are fully aware that space has to be retained for emergency services. i.e. can't be booked by Joe Public. I am unaware of any Tiree resident who has failed to make a medical land emergency medical appointment.

The Convener's question was: *-Whether there has been an assessment of the impact the disruption has had on island economies and on islanders' access to health and social care.* But with regard to land economies, the Minister has not addressed the question, and sees a reserved booking facility as answering the health issue. The Minister must be demanded to submit a substantive response.

Regarding the short-term chartering by Calmac Ferries of freight Ro-Ro ferry MV Arrow etc, the Ministers response is disingenuous.

Scottish Ministers only conceded this charter after immense island pressure. What is missing here is that the Scottish Government conceded to the Ship owners (Isle of Man SS as time-charter owners from SeaTruck) that the vessel could be withdrawn from the charter with just 24 hours notice (See calmac website for more info at www.calmac.co.uk/mv-arrow). Would the Minister, or any member of the NZET Committee, hire a car for 6 weeks from a car hire company, which could take the car back at 24 hours notice, and not replace it with another car...I don't think so!

Such a concession does not offer meaningful additional capacity. Once more this was a reactionary decision to local pressure, with no evidence of long-term strategic thinking/planning by the Scottish Government, Transport Scotland and CalMac.

Will an added freight ferry be operated in Summer 2022? Is this a long term strategic operating decision for this route?

Regarding the New Islay Ferry (NIF), The Minister's response is disingenuous. The Scottish Government pledged to a New Islay Ferry in 2013 to be delivered in 2016, not 2024-25. Regarding cascading, etc, this is no more than a continuum of trying to make a silk purse out of a sow's ear.

2. What discussions you have had with CalMac or others about lessons learned from disruption to services in recent months and how the service can be improved?

The Minister's reply mainly offers platitudes. He is wrong in stating the Community Board is Independent. On the contrary. Board Members have to apply to be appointed by CalMac. The Board's remit is laid down by Transport Scotland- CalMac. Mull, currently, is not represented as its chosen representative was rejected by CalMac ergo the second busiest CHFS route has no representation on this Community Board

3. What plans and contingencies does the Scottish Government have in place (whether or not in partnership with Calmac) to prevent or mitigate a repeat of this disruption in 2022, with particular reference to the holiday season and the increased demands on services that that brings?

Regarding the purchase of the MF Loch Frissa (Ex Utne), the Minister's response is a travesty of the reality. This was not a planned purchase. The purchase was not part of any Ferry investment strategy or any Vessel Replacement and Deployment Plans (see introduction). She is a small ferry (40 cars).

It is contrary to the Scottish Government's 2013 Ferry Plan (VDPR) which proposed 2 Major ferries on the Oban Craignure, confirmed by all subsequent VRDPs, including the latest VRDP. Initial intention was to put the MV Isle of the Lewis on the Oban-Craignure route. This failed due to the Scottish Government's failing to provide the funds to modify Craignure. This failure has continued vis a vis preventing the intended redeployment of MF Hebrides to the Mull route.

The Loch Frissa does not offer added network resilience. Under Class Rules she is restricted to the Clyde, and Firth of Lorne.

The reactive purchase of the Norwegian ferry UTNE (re-named Loch Frissa) was after pressure from the MIFC, which earlier in the year had crowd-funded a catamaran ferry project which the Scottish Government refused to progress. This begat the Scottish Government to charter-in the Pentalina, only for them to succumb to the RMT blocking the charter in June 2021. The UTNE had been on the S&P market from the first quarter of 2021. The Scottish Government-CMAL initial interest in her purchase was in the third quarter of 2021 after the failure to charter -in the Pentalina (June 2021).

Regarding: We are doubling the number of return sailings from Mallaig-Lochboisdale on 3 days of the week:

This is utter a nonsense. The Minister seems to be unaware that throughout this winter this route has been cancelled due to lack of fleet resilience. The MV LoTI, referred to in the petition is the only 'big' ferry that can serve this route.

Hence immediate disruption with no replacement alternative. Mallaig is tide dependent, incurring ferry delay. The MF LoTI has to stand-too off Mallaig to await the tide. This only established that the LB- Mallaig route is redundant and Uist would be better served with an improved UIG triangle service.

Regarding considering additional short-term vessel charters, etc:

This is a Scottish Government-Transport Scotland-CMAL myth. See the farrago regarding the Pentolina charter. In any event the RMT has an effective sanction to block any such charter. Regarding funding, as this is predicated by the caveat '*Considering*' it vacuous

Regarding motor homes /camper vans, etc...

This is very small beer. View the length of time it has taken SG-TS to respond and acknowledge the issue, and the extent of the problem this is a pathetic response. There has been no scrutiny by CFL of previous camper van restrictions to Tiree

Regarding 'the Scottish Government is committed to maintaining and improving lifeline ferry' Kevin Brown MSP made the same statement as Minister for Transport in his Introduction to the 2013 Ferry Plan. Scottish Government-Transport Scotland's subsequent failure to implement 2013 Ferry plan offers no credence to the Scottish Government's commitment

Regarding Resilience Fund, etc...

And why is this required? Because of the Scottish Government's failure to invest as per its own 2023 Ferry Plan which would have radically modernised the fleet. Running ferries into their fourth decade of operation is not only dumb ship-management, but even dumber investment planning. The further comment regarding priorities etc is a platitude. Only dumb ship-management would not tackle the increasing incidence of systemic ferry breakdowns on a priority basis.

Regarding: Scottish Ministers have been proactive and have tasked ferry operators and Caledonian Maritime Assets Ltd with seeking potential second hand tonnage etc. The usual defensive platitude of Scottish Ministers. Other than the Loch Frissa (ex Utne), Scottish Ministers have failed to do so in this 12 years of supposed pro-activism.

In purchasing the Utne, Scottish Government-Transport suspended its ferry dimensional criteria. These criteria have been set to ensure universal network deployment. But the CHFS reality is ferries like the Loch Seaforth and Isle of Lewis cannot be deployed throughout the network. The universal ferry for the CHFS network barely exists in the ferry second hand market. The UTNE purchase was only possible by suspending these network dimensional criteria.

The Loch Frissa (ex UTNE) will be one of the smallest (40 cars) in the CHFS fleet, but is the third deepest draught ferry in the fleet. Only the Loch Seaforth (127 cars) and MV Isle of Lewis (95 cars) have deeper draughts.

Craignure will have to be dredged to accommodate her. Howzat for suspending CHFS dimensional criteria?? Also £3.5m is required for conversion costs.

Possibly more of the 150 odd ferries that CMAL has alleged to have looked at in the last few years, may have been viable purchases, had the same principles been applied.

Regarding: Whether the Scottish Government has considered how access to ferry services can be widened, particularly in the case of younger people, people who have disabilities that may make using the service difficult, and those on lower incomes

I am a total loss to understand the relevancy of any of the topics addressed below. The petition was with regard to access to reliable ferry services, for both islanders and tourists due to covid restrictions and collateral ferry issues. This was not a petition with regard to access to toilets/discounts for school mini-buses /youth travel etc.

Why did the convener pose this question?

Response to Messrs Mackison's submission as below:

Regarding weather disruption etc

The statement '*Around 1 in 20 sailings face disruption due to the difficult waters and weather conditions we experience on the West Coast*' is a risible abuse of statistical analysis. The weather disruption since Mr Mackison's made this submission is all the evidence you need of this abuse. Tiree in the last 3 weeks has experienced 4 in 6 sailings cancelled. Does DML differentiate between cancellation and disruption? The weather conditions we experience on the West Coast are not the even statistical distribution over 365 days. They are seasonally random.

Regarding The working life of ferries is between 25 and 30 years

A very valid point and one which Minister's fail to understand. Current committed replacement plans are to replace ferries approaching 40 years not ones between 25-30 and why the CHFS is not fit for purpose. Regarding resilience, Norwegian ferry tenders stipulate the resilience requirement.

Regarding measures to increase resilience investment in vessel maintenance

No wonder. Look at the fleet age profile. Had the Scottish Government implemented and funded the 2013 Ferry Plan the age profile would have been closer to the profile of the CMAL 10 years Corporate Plan which reflected the 2013 Ferry Plan.

Regarding Managing 34 vessels through their annual dry dock cycle (DD)

The DD schedule for period 2021-2022 has been grossly miss-managed. Four of the BIG Ferries were dry-docked simultaneously. Some required significant steel renewal. It would be surprising if this had not been identified and the DD schedule reviewed to avoid the bournch of a ferry service we have had since the New Year.

Regarding the Vessel Replacement and Deployment Plan (available at this address www.transport.gov.scot/media/41509/vrdp-annual-report-2016-30-january-2018.pdf)

This plan is a work of fiction as have all its predecessors. This plan was with the Minister in May 2019 to be signed-off. That never happened. It has been re drafted consistently since 2017. The plans serve no tangible purpose, other than to record the Scottish Government-Transport Scotland's systemic ferry failure. The first plan (2014) references certain specific R&D . Serving Colonsay has never been addressed. Mull, from 2015, was to be served by two Major ferries. It didn't happen, and now Mull is serviced by one (very old) Major Ferry and one small Ferry . Selling the MFs Isle of Lewis /Isle of Arran /Hebridean Isles is not addressed. Is this a reflection of a lack planning or an acknowledgment of enforced retention in order to provide fleet resilience?

Regarding cost and impact of increased planned and unplanned maintenance grows exponentially with age etc

Ministers have to be force-fed this statement. Currently we have a fleet mainly in its forth operational decade and breaking down with alarming regularity. And the culprit? Scottish Government-Transport Scotland, as a consequence of their neglect to fund their own 2013 ferry Plan.

Regarding Operational Resilience

Most of this response is not borne out by the network chaos of the last few weeks.

Regarding Customer Communication/Our communication strategy is “truth well told” YEP but time and time again not the case ...I have asked on 3 occasions in the last 4 weeks Calmac's explanation for discrepancies in weather forecasting viz a viz cancellation decisions. I have been told this info is confidential.

I served on the Tiree Community Council 2018-2020. In 2019 we made a submission to CalMac (RD) on comparable ferry disruption with these conclusions:

- Tiree requires CalMac to advise the criteria it applies to derive any cancellation decision
- Priority re-booking for life-line service provider's should be default facility in the event of any ferry cancellation
- CalMac's Customer Services communication of cancellations must be urgently reviewed to ensure accurate, relevant information is offered, as opposed to banal generalities

RD promised a response. Tiree has yet to receive it!

Regarding point 2: What plans and contingencies does Caledonian MacBrayne have in place to prevent or mitigate a repeat of this disruption in 2022, with particular reference to the holiday season and the increased demands on services that that brings

The response is vacuous. Had the Scottish Government delivered its 2013 Ferry Plan we would not be in this current parlous ferry state.

RST 21/2/2022