

Dear Shorewatchers,

Our main concerns for the Ship to Ship Oil Transfer application and the grounds for our objection are these:

- 1) The Moray Firth hosts one of the most important bottlenose dolphin populations in European waters, the information in the document is not the most up to date available (*e.g.*, Cheney *et al.*, 2013; Cheney *et al.*, 2014).
- 2) The Ship-to-Ship oil transfer will occur within the Moray Firth bottlenose dolphins Special Area of Conservation (SAC) and close to several other SACs for seals, seabirds and other species. The outer Moray Firth was also recently identified by the Statutory Nature Conservation Agencies as a proposed SAC for harbour porpoises. Any impacts on the integrity of all these SACs would be against the requirements of the EU Habitats Directive.
- 3) The documents as they stand are not adequate. It is not clear if this is an extension to the existing operation at a different location or an additional operation in a new location. No reference is made to the current contract details.
- 4) The Habitat Regulations Appraisal (HRA) is not sufficient. The HRA is required to include long-term impacts on the bottlenose dolphins.
- 5) Severe health impacts have been noted in dolphins exposed to the Deepwater Horizon oil spill in the Gulf of Mexico (Schwacke *et al.*, 2013; Venn-Watson *et al.*, 2015). Furthermore, evidence exists of the impact on health and reproduction of cetaceans from contaminants in UK waters (Murphy *et al.*, 2015; Jepson *et al.*, 2016).
- 6) An adequate Oil Spill Contingency Plan (OSCP) is lacking. The oil spill contingency plan needs to include 'most likely' and 'worst case' scenarios, as well as a detailed cumulative impact assessment of a potential oil spill and other impacts from the consent of this licence.
- 7) Lack of detailed mitigation measures. The proposed mitigation methods would not be sufficient to mitigate against 'likely significant effects' to the Special Area of Conservation.
- 8) No potential alternative sites have been included in the application.
- 9) Lack of adequate consideration of cumulative impacts on cetaceans and other marine species in the region.
- 10) The lack of community stakeholder engagement pre-application was inadequate.

Thank you for all your support. Our final response will be submitted in the next few days.

Best wishes,

The Scottish Dolphin Centre