

Dear Chris, Margaret, Fran (Transport Scotland staff) and Minister,

I have been forwarded two recent pieces of correspondence (attached) and asked for comment by the recipients. There are multiple mis-representations and inaccuracies contained within them that it is important I correct.

1. Yes, we did ‘push for’ the 05:15 sailing from Oban operated by the Loch Frisa during her solo timetable, but that was because the proposed timetable only offered one arrival in Craignure each morning before 12 noon. Because of the very low capacity of the Loch Frisa, that was less than half the required capacity for incoming traffic – including food deliveries. We asked for that sailing not because we wanted such an early departure, but because it was the **only** means to offer adequate capacity within the operating constraints of such a very small and slow ferry.
2. There should be no ‘surprise’ that the Loch Frisa is not well received on Mull and Iona or by MIFC. We have never given a ‘resoundingly positive’ view of the vessel either publicly or privately. We have made our disappointment known in numerous communications with your department and directly to the Minister in person. This was both at our meeting in Mull and during the Teams meeting very helpfully convened by the Minister with TS and CalMac in attendance, where the **sole** topic of conversation was the very bad service being proposed when the Loch Frisa was operating solo. To summarise our view of the Loch Frisa, I will quote from our most recent email sent to Robbie Drummond, a copy of which has been sent to you: ***“The Utne. A ferry so small that she can’t operate the route on her own in winter. So slow that our public transport connections have been severely harmed. So lacking in vehicle space that the summer capacity crisis of the networks’ most congested route has been made worse. So sea-sickness inducing that many locals avoid using it. So restricted in operation that she can only ply between Oban and Craignure. So ill-suited that passenger access systems can’t be used. (Her only positive attribute is her ability to keep working in poor weather – but since she has to be paired with another boat, the benefit is largely lost because if the larger but less weather-resilient ferry cancels, she has to also”***
3. The Facebook post quoted was in praise of the Loch Frisa crew and to recognise the one good attribute of the ferry – she has low windage and is very manoeuvrable, making her easier to berth in high winds (an attribute missing in the typical slab-sided traditional monohulls favoured by CMAL). To quote that FB post as evidence that MIFC are pleased with the vessel is not just highly selective, but misleading. For a more complete account of our view of the Loch Frisa, please see here a post of exactly one year ago: <https://mullandionaferrycommittee.org/2021/12/14/the-utne-the-good-the-bad-and-the-consequences/> . We stand by all of that, except the weather reliability where she has proven herself better than expected. However, her motion in even moderate conditions is so sickness-inducing that many locals avoid using her. (Note that one of the early reasons stated by CMAL’s CEO for doubting the catamaran was her passenger comfort, and that a Motion Sickness Index would need to be produced, and a Seakeeping Analysis performed to allay those fears. Compare that with the Loch Frisa, where **no** MSI study was performed, and **no** Seakeeping

analysis was undertaken. She has proven to be the most sea-sickness inducing CalMac vessel anyone can recall.)

4. Regarding the catamaran purchase – The seller was Sealease, not STS. STS was the designer. She was not being sold ‘partially built’ – the sales offer was explicitly for a finished vessel to the spec that the yard had been contracted to build. A second modification proposal was offered to make the vessel good for UK operation. The vessel was not designed ‘for the Pacific islands’, but for a Venezuelan customer. Venezuela is in the Caribbean. It was built to Australian and Lloyds Register regulations. It had interest from Canada and Australia; and was ultimately bought by an operator from the Philippines.
5. It is not correct that ‘the price did not take account of the extensive alterations required to meet UK regulations’. An estimate of \$2.5m was provided for the cost of not just the regulatory modifications, but for the addition of live-aboard crew cabins which the seller was told was an absolute requirement. (No such absolute requirement was applied for the Loch Frisa). The total purchase price including those modifications was \$12m, or £10m. (By comparison, the Loch Frisa has cost £9.5m. She is half the size, much slower, eight years old, and coes with the huge operating cost burden of hotels being provided for the crew).
6. The community of Mull and Iona co-funded together with the seller a very thorough technical assessment of the vessel design against the most up-to-date MCA regulations. It concluded that all modifications were moderate and achievable, and once completed the vessel would have had ‘unprecedented levels of survivability’ (ie the ability of the vessel to withstand damage and remain stable in all applicable sea conditions). By objective technical measures of survivability, it would have been the safest vessel in the CalMac fleet.
7. It is untrue that ‘*If the vessel had been unable to comply with the Maritime and Coastguard Agency’s requirements, we would have been in possession of a vessel which was unsuitable to be used in our waters and with a very limited market in which to sell it.*’. The vessel was offered with the very generous and unusual clause that should the vessel have proven to be incapable of being amended to suit UK regulations, the sale agreement would have been null and void. There was no such regulatory/commercial risk.
8. It is not true that CMAL’s naval architecture consultants Leadship “...*advised that it would not be practical, and may not be possible, to rebuild the vessel in order to make it compliant for operation in Scottish waters*”. The Leadship 3 page memo agreed with the 76 page technical evaluation we commissioned from Strathclyde University that the most significant and intrusive structural changes required to meet regulatory compliance were viable and compliant – “*Such modifications are deemed acceptable and possibly not too complicated to achieve...*”. Most of the report refers to unknown or unclear information, discrepancies in the information provided, and known minor regulatory gaps that would need to be addressed. It did not conclude with ANY recommendation regarding purchase, but instead listed further information and clarification that would be needed before making a judgement. Neither Leadship nor CMAL made **any** attempt to obtain that clarification or information.
9. It is not correct that the government has ‘*invested*’ £2 billion in ferry services and infrastructure. The government has *spent* £2bn. The majority of that has been operating subsidy to the operator, currently running at £150 million per year. Operating subsidy is not an investment, it is a cost that in great part is a direct result of the inefficiency and waste in a system that suffers from very poor investment decisions, such as the dogmatic refusal to buy the 60m catamaran.

10. The Transport Minister Graeme Dey ultimately decided not to peruse the catamaran purchase because he was **misled**. It was not due to real commercial risk or regulatory hurdles as these letters suggest. As we have learned from internal emails provided under FOI, he was misled by CalMac's Head of Marine, who dismissed catamarans as declining in popularity and being unsuitable for Scottish waters. Both points are demonstrably incorrect and borne of ignorance of the subject. He was also misled by CMAL, who insisted throughout the process that it was the **seller's** responsibility to achieve regulatory compliance from the MCA before a purchase could go ahead. This is proven false not just by reading the sale offer from Sealease, but by the purchase of the Utne under exactly the same sale terms. She was bought as-is, and **CMAL** were responsible for adapting her for operation here. Right to the end, CMAL continued to insist it was a new-build, as if they were buying from a shipyard. That was a position that is not just demonstrably false but determinedly misleading. It is a misrepresentation that continues to this date, as demonstrated by the inaccuracies in these letters.

I am astonished that such mis-understanding, mis-communication and mis-representation persists on this subject. The Minister is absolutely right that it is important to listen to islanders. But unfortunately its not just that we haven't been heard, but what we have said has been mis-represented. We have even been denigrated in the press by the CEO of CMAL as '*a bunch of islanders who think they know it all because they happen to live on an island*'. If any of you wish to read the full details of the affair, you can do so [here](#).

If Transport Scotland or the Minister continue to mis-understand what we are saying, or continue to be incorrectly briefed on these critical subjects, poor decisions and misrepresentation as in the attached will continue. Part of the solution to that is **better and more communication**. We would welcome the opportunity to talk through all of this with TS officials and the Minister, and hope that our regular offers of dialogue will be taken up more regularly. All too often they are not. In the absence of dialogue and in the presence of this kind of mis-representation, our only means of correction is public, via the press and our website. PLEASE can we have more and better direct dialogue so that we can avoid having to do this publicly.

With best regards

Joe Reade, Chair, Mull & Iona Ferry Committee