

The Gibraltar
Ornithological &



Natural History
Society

REGISTERED CHARITY No. 54

GIBRALTAR NATURAL HISTORY FIELD CENTRE, JEWS' GATE, UPPER ROCK NATURE RESERVE

P.O. BOX 843, GIBRALTAR. TEL: (350) 72639 FAX: (350) 74022.

E-Mail: secretariat@gonhs.org URL: www.gonhs.org

EASTIDE BUNKERING

The Gibraltar Ornithological & Natural History Society (GONHS) is concerned about the potential effect of bunkering on the eastside.

It is important that no such activity take place before the completion and appropriate consideration of the Environmental Impact Assessment, and of an Appropriate Assessment under the provisions of the Habitats Directive.

The latter is required in view of the area's status as a Special Area of Conservation.

The assessments should take into consideration all the relevant potential impacts on the environment, which will include the effects of discharges of fuel or fumes, and the effects of anchoring of the vessels. The implication of the activity on the law of Gibraltar, specifically the nature Protection Act, would need to be assessed. Mitigation and compensation measures would also have to be considered as part of these analyses.

27 May 2011



LIFE PRESIDENT: FIELD MARSHAL SIR JOHN CHAPPLE GCB, CBE.



ESG Opposed to East Side Bunkering

27th May 2011

In October 2010, the ESG, along with several other stakeholders, were consulted by EIA scientists¹ commissioned by the Port of Gibraltar on behalf of Govt, to hear concerns over the proposed expansion of bunkering activity to the East Side of Gibraltar. The ESG has publicly campaigned for GoG to address existing environmental and health concerns from existing bunkering activity on the western flank of the Rock and therefore sees further expansion as a totally backward step - One that we shall campaign against as we have done on other issues that threaten our health and living environment². *Specifically our key concerns are summarised as follows-*

- ESG very concerned that both the Port and GoG have already stated support for east Side Bunkering, even stating the conditions under which this will take place, **BEFORE** an EIA has even been completed!
- ESG receives **reports/complaints** throughout the year and especially during warmer months from residents complaining about the intolerable level of fumes in their neighbourhood linked to bunkering activity (wind direction and increased volatility of fuel vapours). Given the 24hr nature of the bunkering activity this problem affects people also on a 24hr basis;
- Existing bunkering activity already affects people's quality of life, air quality and marine environment; new activity on the East Side will increase this air pollution locally as we shall get the fumes no matter the wind direction;
- ESG has long campaigned for improvements to the Ports "**reporting protocol/procedure**" as this continues to be inadequate to follow up and investigate sources of pollution from bunkering activity. (New number to call **56001652** – **IMPORTANT** - Call **during the polluting episode**);
- ESG has lobbied both the Port and Ministry for **vapour recovery technology** to be applied to bunkering to stop fugitive fumes from affecting our community;
- ESG has campaigned locally and at cross border level for **port co-operation**, improved tracking technology and monitoring and for limits to be imposed in our ever increasingly congested Bay;
- ESG and GONHS form part of a cross border NGO group which lobbies the **Tripartite Forum** on regional environmental issues which includes bunkering activity in Gibraltar (from floating mother ships etc.)
- **VTS technology** (vessel tracking systems) was installed at the Port to prevent further collisions at sea which were on the increase off the Rock and was long overdue to safeguard existing practice and allow the Port to safely carry out its responsibilities; It's clear that while VTS can monitor with impressive precision it cannot stop all accidents from happening as was recently seen when two barges collided;
- **Authoritative studies**³ carried out on Bay sedimentary contamination³ highlights how chemical pollution from industrial discharge and chronic minor spillages from fuel transfers within the Bay highlight the need to manage all harmful activity – not expand this;
- ESG also concerned about **water quality** for bathing and marine life reasons;
- Concerned about protecting and conserving **local biodiversity** - already under growing pressure from maritime activity/reclamation/anchorage impact/dredging/ever present threat of major oil spill;
- East Side provides a *calmer and more natural environment* for the community to enjoy and should be preserved;
- Full disclosure of the real economic benefits to the local purse from bunkering activity must be published, **building in** the potential loss in tourism from increased industrialisation of Gibraltar and the *priceless factor of quality of life* for ourselves and our families if immediate economic profits are to always take precedence over quality of life;

Contact ESG: www.esg-gib.net Email: esg@gibtelecom.net Tel: 200-48996 Mobile: 54960000

¹ Gifford's

² www.esg-gib.net

³ Greenpeace Study posted on ESG website-resources-documents

GIBRALTAR FEDERATION OF SEA ANGLERS

GFSA is totally opposed to bunkering because of its detrimental and destructive effects on marine life and the marine environment. However it recognises that this activity currently takes place in Bay of Gibraltar. Whilst it would prefer that the activity does not take place at all the reality is that it exists. In this context GFSA supports the ESG's attempts to try and bring this activity under more robust regulation and control to ensure that there are no negative impacts on the environment. This week there was another incident reported when a Chinese owned ship that had taken bunkers in the Bay had a small collision with one of the floating fuel petrol stations anchored in the Bay.

This is a stark reminder that without proper controls there is the potential for a very big incident to happen in Gibraltar waters. The marine environment and the seabed around our small coast line will not sustain such an accident.

To extend bunkering to the East Side is totally opposed by the Federation. This contravenes totally the environmental stance of GFSA . To extend this activity is not be compatible with the Government's designation of the Southern Waters of Gibraltar as a marine reserve. GFSA does not understand how the Government can make a case for it given this designation.

Enough harm has already been done in the Bay and any attempt to extend this to the East Side will be opposed vigorously. GFSA does not agree with the continuing destruction of reefs and the sea bed caused by the use of anchors and anchor chains and calls for all the introduction of fixed anchorages. Not only will these put a stop to the destruction of reefs but they will promote and create new habitats where marine life can develop and thrive.

There has been a sharp increase in the number of spillages and other accidents in the Bay and off Europa Point in recent years that have polluted the seas surrounding Gibraltar. If bunkering takes place on the East side the risks will increase and with it the chances of causing irreversible damage to the marine environment. GFSA does not want a repeat of these incidents.

GFSA is totally opposed to East Side bunkering.

26th May 2011



Gibraltar Sub-Aqua Club
BSAC 888
Parson's Lodge
Rosia Road
Gibraltar

Date: 27th May 2011

Re: East Side Marine Bunkering

The GSAC is opposed to the expansion of marine bunkering activities to the east side for the following reasons:

1. **Anchor and chain damage.** Every time an anchor is dropped onto a reef or other underwater formation, it damages these structures by breaking pieces away, eventually demolishing them to nothing.

The ship at anchor releases a length of chain which is approximately 3 times the depth of the water at that point. Once there is a change of tide the chain scrapes a radius along the bottom, destroying and removing all marine life on the bottom and that attached to any formations.

Eg: the kelp forest at 'el lomo' (a popular dive site on the East side) has been depleted to almost zero because of this. Removal of kelp results in a loss of sheltered habitat for immature marine creatures and the loss of a critical breeding ground. This loss leads to lesser fish stocks in the area and also less biodiversity. Although not an environmental consideration, there is a reduced fish stock for local fishermen.

The chain and anchor damage also destroys fish egg deposit grounds, in particular the cephalopod (molluscs) family and species of dogfish. Hence population recovery takes even longer.

The removal and cleaning up of reefs also reduces entanglements otherwise experienced by Spanish trawler fishermen, thus further creating an incentive for netting and the destruction and capture of the few remaining marine life.

All scallops and other shellfish living above the surface of the sand are also damaged and destroyed by the chain action.

The amount of anchoring now is already excessive and if one considers the total surface area which the radius of a 100m chain can describe at it moves, then even if there is just a small increase in anchoring, the reefs will soon be depleted to levels which can only lead to a recession of life with no chance of ever regenerating.

2. **Oil spillages** in the top part of the water column will undoubtedly affect spawning success rates as many eggs/sperm will be contaminated.

Local fish stocks depend on surface migratory crabs and small fish to feed on. These always travel on the surface. They will die from feeding on contaminated particles and/or subsequently contaminating the fish that eat them.

If in the event of an oil spill, dispersants are used, the globules formed will sink in the water column and over the years will destroy the reefs and kill filter feeders (ie. shellfish) in the sandy areas outside the reefs. In effect it destroys reef and non-reef sandy area marine life.

Marine life in the coastal water column is destroyed by the continuous deposits of oil slicks – no matter how small these are.

Oil is many times observed on the seabed by divers. This oil takes the form of balls ranging in size from a tennis ball to a handball. This no doubt kills sensitive plant life and corals besides being a disgusting eyesore.

Surface oil and other contaminant slicks damage expensive diving equipment and present a hazard to the diver. We can presume that these slicks are also hazardous to bathers.

Oils are harmful to passing cetaceans.

3. Every time a vessel anchors, **rubbish** is dumped overboard. As divers we encounter this at the bottom quite frequently.
4. Bay waters are often out of bounds for divers because of heavy maritime traffic, and we prefer the East side. **Increased traffic** here is clearly a hazard to submerged and decompressing divers.

Conclusion:

The social marginal utility gained from this increase in commerce is clearly outweighed by the social marginal disutility brought on by the environmental risk exposure. At what social and environmental cost will this relatively small % increase in GDP be enjoyed? £ is not the scarce resource - our waters, marine life and coastline are.

Chris Riddell
Chairman

Vinod Khiani
Vice-chairman

THE
CALETA HOTEL
— GIBRALTAR —
★ ★ ★ ★

24th May 2011

To Whom It May Concern

Re : Eastside

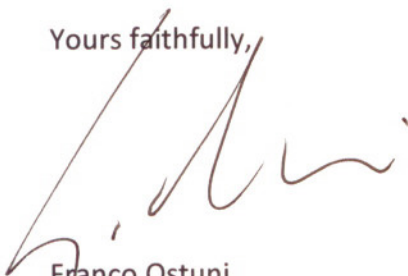
After being briefed by the company that was appointed to carry out an environmental impact study on the possibility of east side bunkering and after having considered the consequences of this activity, at the Caleta Hotel we can only be against any kind of bunkering.

Bunkering is totally against the nature of our industry and certainly not an environmentally friendly activity. The consequences of such activity will result in water pollution, noise pollution and smells. This is totally detrimental to our business and will spoil forever the only unpolluted coast left in Gibraltar.

While we can understand and appreciate the commercial opportunities that such activities might bring to Gibraltar PLC, it is totally detrimental to the environment and our industry. It will jeopardise any future tourism development in Gibraltar and affect the residential areas enormously.

The hotel will vigorously oppose such activity.

Yours faithfully,



Franco Ostuni
General Manager



Both Worlds (Retirement) Management Company Limited
9 Resolution
Both Worlds
Gibraltar

22 May 2011

PROPOSED EAST SIDE BUNKERING

1. We applaud all initiatives which contribute to the prosperity of Gibraltar but believe that short term developments must be viewed not only in terms of commercial gain but also in terms of long term expense:
 - 1.1. to the environment
 - 1.2. to the people who live in the vicinity
 - 1.3. to all the people of Gibraltar
2. We are concerned that no environmental impact study has been undertaken. An in-depth study should be undertaken and the results made public.
3. We are concerned that the number of vessels anchoring on the East Side will increase and will destroy the natural seabed environment with loss of flora and fauna.
4. We are concerned that there is the very real risk of a major oil spill which could ruin our beach and the adjacent coastline for years to come. This area is of prime recreational value for the whole Gibraltar community and must not be exposed to these dangers.
5. We are concerned that minor oil spills will accumulate and in the end be just as destructive as one major spill.
6. We are concerned that an additional numbers of vessels will also produce vastly more quantities of sulphur in our air as ships' fuel is renowned to be of low quality and thus produces excessive atmospheric pollution.
7. We are concerned that the proposal will expose us to pungent odours when the wind direction is from south to south westerly.
8. We are concerned that the increased air pollution will effect the residents of our retirement home. Older people, like young children, are very susceptible to asthma, allergic reactions and bronchial infections.
9. We are concerned that there is no comprehensive long-term strategic plan for the development of Gibraltar in general and for the East Side in particular.



Patricia Hayward
Director



Roy Smith
Director

BOTH WORLDS MANAGEMENT LIMITED

22nd May 2011

Proposed East Side Bunkering Project

The directors of BWML resolved to “object strongly” to the proposed expansion of Bunkering to the East side of the Rock at our meeting held on the 12th. October 2010. The main thrust of the resolution was to support and participate in any disciplined joint action by responsible groups of like-minded East Side stakeholders. Our first and foremost concern is for the HEALTH & SAFETY of Both Worlds residents, visitors and contractors, the issues as we see them are:-

Fumes from the Bunkering process being trapped within Sandy Bay and thereby posing a **direct threat to health.**

Noise pollution accompanying the increase of large ships anchoring off the East side and the Bunkering process itself.

Light pollution particularly on winter mornings & evenings and should Bunkering be increased to a 24 hour service as in the Bay of Gibraltar.

The possibility of East side beaches becoming contaminated following an **oil spill** as containment equipment would take some time to deploy.

Weather and Sea conditions change considerably & quickly on the East side of the Rock, sometimes with disastrous results, Bunkering activities could potentially increase the prospect of large ships coming to grief, jeopardizing both lives and the Summer recreational beaches of Gibraltar.

Secondary concerns are those of lifestyle as we enjoy an enviable position on the East side:-

The open sea views are in stark contrast to the “Bunkering Factory” of the Bay of Gibraltar

The bathing season and the opportunity to enjoy the beaches and sea in a relatively unpolluted environment.

The incredible sightings of **dolphins & whales** making their way to & from the Straits of Gibraltar

BWML understands and sympathizes with the **Ecological** issues the prospect of East side Bunkering could inflict and would like to record our support for those concerned with the **Environment, Fishing & Diving** on the East side of the Rock

BWML