

From: Robert Hunter | Isle of Man Steam Packet Company [REDACTED]
Sent: 24 February 2025 16:11
To: Morgan Offshore Wind Project
Subject: Morgan Windfarm - IP Isle of Man Steam Packet Company - Examples of Passenger Vessel Power Loss in the Irish Sea

Dear Sir / madam,

At the recent Issue Specific Hearing (agenda item 3A) on 12th Feb 2025, the subject of vessels losing power and subsequently drifting or dragging anchor in the direction of a windfarm was raised.

For the benefit of the Examining Authority and in the interests of maritime safety the Isle of Man Steam Packet Company agreed to share examples of Steam Packet passenger vessels losing power at sea. The information provided is to highlight why wide corridors and gaps between windfarms are highly important as a contingency measure in addition to application of the Prevention of Collisions Regulation at Sea (COLREG) requirements, and that such circumstances need to be duly considered as part of any Emergency Rescue Cooperation Plan.

Example 1 - MV Manxman 08 October 2023 – Transformer Breaker Issue

At 09:28, three generators were synchronized and feeding the switchboard. For fuel efficiency, as part of standard practice, the load was transferred from Generator No4 to No3 on the aft switchboard. Shortly after, the transformer on the aft switchboard tripped without any warning. Following the trip, power was restored, and both generators were operating at about 88% load, with approximately 52% on the PEMs (Propulsion Electric Motors).

During this period the vessel was drifting while implementing investigation and repairs. The master was able to monitor the vessel's drift and continually reviewed the need to anchor. Anchoring was not considered necessary given the open sea room.

At 09:57, the transformer on the forward switchboard also tripped without warning, and the circuit breaker panel indicated a current overload. With both transformers tripped, the switchboard was unable to function at full capacity. Attempts to close the transformer breaker required a complete blackout, so the forward switchboard was blacked out. However, the breaker still could not be engaged.

Given that only 50% power was available on both PEMs, the decision was made to return to Douglas instead of continuing to Heysham. The vessel berthed in Douglas with the aid of a tug at approximately 17:50.

Additionally, during the vessel's manoeuvres, the PEMs were directly coupled to the generators. The change in load and frequency created a challenge for the generators to maintain power. This setup was not designed for continuous operation. Any adverse weather conditions or significant loading/unloading of the propulsion system could have resulted in a vessel blackout.

Example 2 – MV Ben my Chree 13 Jan 2020 – fuel pump malfunction

Whilst on passage during adverse weather the main engine shut down due to apparent fuel pump malfunction. The vessel had weather routed to reduce rolling motion prior to shut down occurring. The vessel drifted "Not under Command" in compliance with the COLREGS while investigation and repairs were made before resuming passage to the destination port. Other vessels in the vicinity were informed and asked to give a wide berth while the vessel was drifting.

For each example the incident was reported to the vessel's regulatory authority.

Whilst cases of a ship losing propulsion at sea is not common it is entirely possible and must be given due consideration. The Isle of Man Steam Packet Company sincerely hopes the Examining Authority gives such

consideration to the above for the benefit of all types of vessels transiting the Mooir Vannin/Morgan bottleneck 'gap' area.

Sincerely,
Robert Hunter



Robert Hunter
Marine Manager, DPA, CSO
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From: Robert Hunter | Isle of Man Steam Packet Company [REDACTED]
Sent: 24 February 2025 16:11
To: Morgan Offshore Wind Project
Subject: Morgan Windfarm - IP Isle of Man Steam Packet Company - Communication to the Examining Authority

Dear Sir / Madam,

As an Interested Party in the Morgan windfarm development, the Isle of Man Steam Packet company would like to further clarify points raised during the Issue Specific Hearing (ISH) on 12th Feb 2025 for due consideration by the Examining Authority.

The following concerns the 'gap' separation distance between the northern boundary of the proposed Morgan area (United Kingdom territorial sea) and the proposed south-east boundary area of the Mooir Vannin windfarm area (Isle of Man territorial sea).

As stated in ISH on the 12th Feb 2025 the Isle of Man Steam Packet's position is the proposed 4.1nm separation is a 'bottleneck' gap and is not sufficient for multiple vessel interaction potentially entering and leaving the area from multiple differing directions. This situation is in contrast to a corridor situation such as that between the proposed Morgan and existing Walney area where vessels will predominantly sailing in an east/west direction.

All vessels encountering one another within the bottleneck gap area will be obliged to implement the requirements of the Prevention of Collisions at Sea Regulation (COLREGS) as they interpret them in absence of any traffic management systems. Differing interpretations and implementation of the COLREGS such as that by small boat skippers and merchant ship Captains may result in either confusion, close quarter situations, or avoiding action between vessels where sufficient action was not taken in good time in compliance with the COLREGS.

Under the COLREGs certain vessels are required to maintain course and speed (the Stand-on vessel) and others are the 'give way' vessel in specific scenarios and conditions. Under COLREG Rule 8 where vessel who is not to be impeded determines they have to take avoiding action, avoiding action may constitute a large change in heading or significant speed change. The effectiveness of a speed change will be determined by the characteristics of the vessel and a large change of heading requires available sea room. Indeed, the COLREGS places much emphasis on available sea room for actions taken to avoid collision.

The Isle of Man Steam Packet formed this conclusion based on hazard simulator work, interpretation of the COLREGS, experience operating passenger ships and high speed craft transiting the area over many years which includes existing windfarm sites, and the principles of risk contained within MGN 654 Annex 2. When applying the principles MGN 654 Annex 2 to the gap the Isle of Man Steam Packet considers two vessels passing one another at a distance of 1 nautical mile while each vessel maintains a "low risk" to the windfarms to the other side. This equates to a minimum "low risk" distance of 2 nautical miles between a vessel and the windfarm. It is entirely possible this passing situation could become more complex where small boats, eg work boats, pleasure vessels or fishing boats are interspersed in the 'gap' area also.

The Isle of Man Steam Packet opines "low risk" passing distance in areas where passenger ships and passenger high speed craft frequent transit on established ferry routes are of particular significance, especially where a collision or allision could become a mass casualty event involving 900+ passengers and crew. Therefore looking wholly across the Mooir Vannin/Morgan windfarm gap the Isle of Man Steam Packet Company determined the minimum appropriate clearance distances to be in excess of;

Wind-turbine ← 2nm → ship ← 1nm → ship ← 2nm → wind-turbine. Equating to a minimum of 5nm (5 nautical miles).

The proposed gap area is currently open sea room without restriction. The Isle of Man Steam Packet considers the proposed gap is not as low as reasonably possible (ALARP) as there is sufficient sea room to widen the gap further without impediment. Therefore the Isle of Man Steam Packet kindly request the Examining Authority consider imposing measures to widen the Morgan/Mooir Vannin gap further in excess of 5 nautical miles by imposing measures such as:

- Encouraging the Morgan and Mooir Vannin developers to work together to increase the gap;
- Imposing boundary restrictions or exclusion zones to the development area to increase the gap

The Isle of Man Steam Packet Company sincerely hopes the Examining Authority gives due consideration to the above for all types of vessels transiting the Mooir Vannin/Morgan bottleneck 'gap' area.

Sincerely,
Robert Hunter



Robert Hunter

Marine Manager, DPA, CSO

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