



CEREDIGION LIFEBOAT CAMPAIGN

RNLI DATA REFUTATION SUMMARY

CLC-DR-002 REVISION 1

1	20-Nov-17	Issued for Use	HW	AW	RT
0	16-Nov-17	Issued for Internal Review	HW	AT/RT	--

REV

DATE

DESCRIPTION

BY

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APP'D

Ceredigion Lifeboat Campaign

MISSION STATEMENT

OBJECTIVES.

The Ceredigion Lifeboat Campaign was initiated in June 2017 to bring into public scrutiny the undisclosed data and processes by which the RNLI arrived at a decision to remove All-weather Lifeboat (ALB) cover from New Quay, West Wales.

The Campaign Action Group, which includes a number of New Quay Lifeboat crew members alongside representatives of wider maritime and community interests, is an independent organisation. It will use all appropriate means in its dedicated task to reverse the RNLI decision that denies adequate All-weather Lifeboat cover to the whole 63-mile gap between the nearest ALB stations at Barmouth and Fishguard.

GATHERING EVIDENCE.

The Campaign Action Group is committed to identifying and publishing irrefutable evidence to prove that the decision creates an unacceptable level of risk to the lives and wellbeing of future lifeboat crews and sea farers, particularly in the sea area off New Quay and Aberaeron that will be up to 90 minutes' travel time away from the nearest All-weather Lifeboat cover.

DEFINITIONS.

In publishing data that compares New Quay's service history with that of any other station in the region, there is no intent to question the allocation of new lifeboats to neighbouring stations as designated by the latest RNLI five-yearly coast review.

In comparing the capabilities of the Shannon-class ALB (the natural successor to New Quay's current 25-year-old Mersey-class ALB) with the Atlantic 85 inshore lifeboat, the replacement vessel the RNLI have allocated to New Quay, there is no intent to question the virtues of that vessel when deployed to the duties for which it is designed. Our contention is that this open boat is a wholly inadequate substitute for a well-equipped, enclosed, all-weather, self-righting vessel that it is intended to replace, given the distance to the nearest All-weather Lifeboat.

PUBLIC SUPPORT.

The campaign enjoys committed support from the local communities, their elected representatives and leading public figures. An online and paper-based petition currently stands in excess of 15,000 signatories (Nov 2017). Backing is spreading further afield. The campaign is actively engaged in broadening and deepening its support base to further demonstrate its legitimacy.

RESOURCES.

The campaign is bolstered by a number of professionally skilled supporters who give their services free of charge. Our costs to date have been kept low and been met by donations from lifeboat crew and Campaign Action Group members, sponsorship by local businesses, and unsolicited donations from individuals and groups within our local communities and further afield. Sponsorship opportunities have begun to emerge from major national businesses, and the campaign is exploring options to form a charity that could provide long-term charitable legacy opportunities.

Campaign activists remain absolutely loyal to the high principles and objectives of the RNLI, and the Ceredigion Lifeboat Campaign exists purely to challenge this single decision.

www.ceredigionlifeboatcampaign.org.uk

1 RNLI DATA ANALYSIS REPORT

- The data provided by the RNLI consists of a 29-page document, titled “New Quay Lifeboat Station – Data Analysis.” This is obviously an incomplete set of data but the RNLI has refused to disclose any more data to CLC.

1.1 DATA SAMPLE

- The RNLI data analysis report is based almost entirely on Return of Service data for 2011 to 2015 only. **This data sample is inadequate and the results are statistically meaningless. To make a decision of this magnitude based on so little data is flawed and reckless.**

1.2 ERRORS IN DATA

- There are a number of factual errors in the report. For example, it is stated that there were zero services involving a helicopter during the period 2011 to 2015. This is factually incorrect, and records show that there were at least two helicopter services during this period.
- **The errors in the data call into question the thoroughness and accuracy of the data gathering process. This casts doubt over the validity of the report in its entirety.**

1.3 DATA ANALYSIS

- It is stated in the RNLI’s report (based on 2011 to 2015 data) that only 85% of New Quay’s All-weather Lifeboat (ALB) services are achievable by an Atlantic 85. **When a larger data sample (10 years) is considered (ref. Section 3), only 75% of New Quay’s ALB services are achievable by an Atlantic 85.**
- The report states that, during the period considered (2011 to 2015), “there were no incidents in which the wind speed at incident location exceeded the limits for a B-class ILB.” However, it is not mentioned that there were 2 services where New Quay ALB was launched at the request of Aberystwyth’s Lifeboat Operations Manager (LOM) due to the sea conditions off Aberystwyth (officially recorded as force 7 and force 6 respectively – the day and night time operational limits of the Atlantic 85).
- When a larger data sample (10 years) is considered, there have been 7 occasions where New Quay ALB has carried out services in force 8 or above, and 11 occasions in force 7 or above (ref. Section 3).

- The statistics show that the 3 stations considered in the review (New Quay, Barmouth and Pwllheli) are generally similar in the number of incidents attended.
- The data sample is so small that it is not statistically meaningful. To interpret trends (e.g. “since 2013 there has been a year on year reduction in incidents at Barmouth and New Quay”) from such a small sample of data carries no weight, with any trends masked by the historically observed peaks and troughs.
- This is borne out by the increase in the number of incidents that New Quay Lifeboat has attended so far in 2017: 9 as of end September 2017 (the same number as Barmouth and Pwllheli combined).
- The data shows that New Quay’s ALB has saved more lives than Barmouth and Pwllheli ALBs combined in the period 2011 to 2015.

1.4 ALB STRATEGY MODEL

- Whilst the majority of the limited information disclosed is based on data for 2011 to 2015, the ALB strategy model is based on data for 2008 to 2014 (i.e. 7 years). Only Scenario 6 (Shannons at Barmouth and Pwllheli and an Atlantic 85 at New Quay) is included. Access to scenarios 1 to 5 and, perhaps, 7 onwards, has been denied.
- The RNLI’s own report clearly shows that, after 2020, in Cardigan Bay, it will not be possible to achieve the RNLI’s aim, as stated in its Plans and Purpose:

“We aim to ensure our crews can reach at least 90% of all casualties within 10 nautical miles of the coast, within 30 minutes of a lifeboat launch – in any weather.”

Without an ALB at New Quay, the assumed cover provided by Fishguard impacts on the 90% aspiration, with its 30-minute response potential dropping to 81%.

- It is telling that the RNLI have refused to release the results for scenarios 1 to 5, or for any other scenarios considered. It is our contention that Scenario 6 offers the cheapest rather than the best option.

2 ANALYSIS OF RETURNS OF SERVICE

2.1 BASIS OF ANALYSIS

- In the absence of full data disclosure by the RNLI, CLC has reviewed and analysed the returns of service for New Quay and Barmouth all-weather lifeboats for a 10-year period from January 2007 to December 2016.
- The premise of this data analysis is to demonstrate that, if an ALB is required in Barmouth, then an ALB is also required in New Quay. There is no intention to challenge the validity of allocating an ALB to Barmouth.
- In order to determine the services where an ALB was absolutely required, the RNLI's operational limits for the Atlantic 85 have been considered, plus launches at the request of flank station LOMs due to adverse weather conditions.

2.2 RESULTS

- Over the 10-year period, New Quay's ALB has been significantly busier than Barmouth's (Figure 2.1).

2.2.1 Services Beyond Atlantic 85 Capability

- **Of the 80 services carried out by New Quay's ALB, 25% were beyond the capability of an Atlantic 85:**
 - Weather in excess of Atlantic 85 limitations: **8** occasions;
 - Distance greater than 10nm: **7** occasions;
 - Towing vessels >10m: **7** occasions;
 - At the request of flank station LOM due to weather: **2** occasions;
 - ALB salvage pump required to prevent sinking: **1** occasion.
- During the same time period, Barmouth ALB has carried out only one service that was beyond the capability of an Atlantic 85, and has not carried out any services in weather conditions in excess of force 6.
- During the last 10 years, New Quay's ALB has attended 4 incidents involving yachts and 1 involving a canoeist in conditions of force 8 or above.
- The year 2008 is an interesting case in point. Of a total of 17 services for New Quay's ALB:
 - **5** were in force 8 or above;

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- **2** involved towing boats >10 metres in length;
 - **2** were to casualties further than 10 nautical miles from shore;
 - **1** required an ALB salvage pump to prevent sinking.
- **As a result of services beyond the capability of an Atlantic 85, 9 lives were saved by New Quay’s ALB in 2008 alone.**

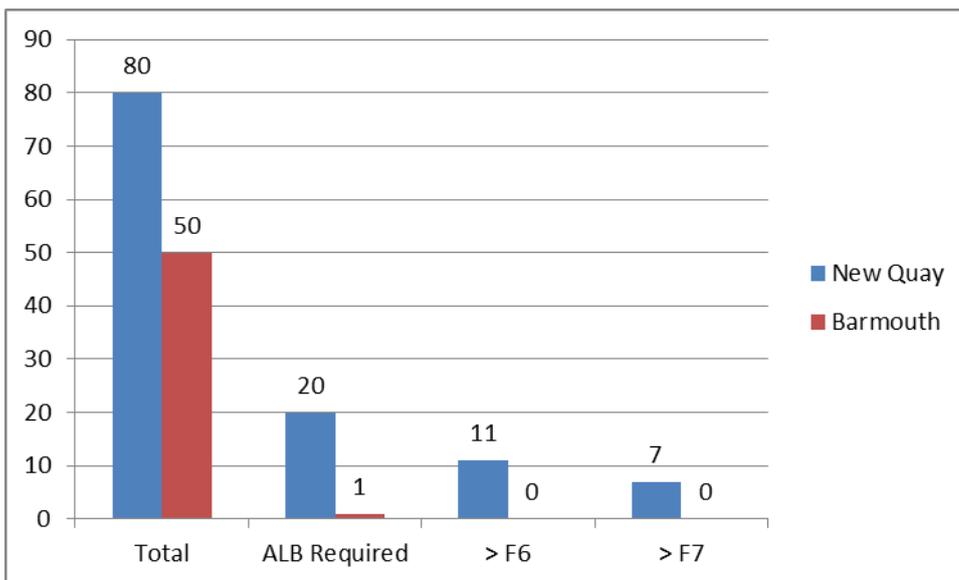


Figure 2.1 - New Quay & Barmouth ALB Services 2007 to 2016

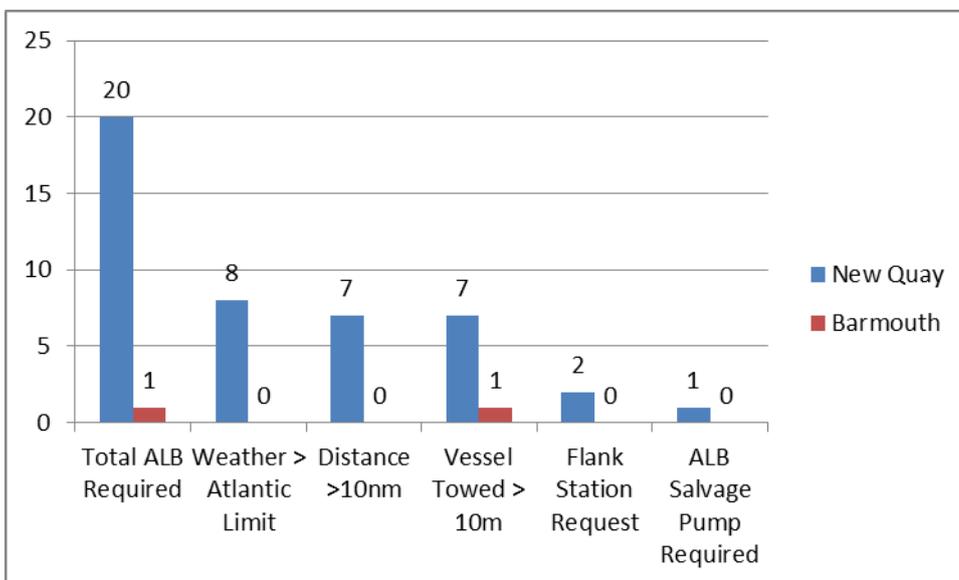


Figure 2.2 - Breakdown of ALB Required Services 2007 to 2016

2.2.2 Simultaneous Services

- Lifeboats at flank stations are occasionally tasked to separate services at the same time, on the same day, significantly impacting on the RNLI's assumption that a Barmouth based ALB will always be available to cover the sea area between New Quay and Aberystwyth. For example:
 - 07-08-16 - Barmouth ALB was searching for two teenagers swept out to sea at Barmouth whilst, at the same time, New Quay ALB was searching for a man swept off the rocks at Mwnt. Fishguard's ALB later joined this search operation;
 - 15-04-07 – New Quay and Barmouth ALBs tasked to assist different vessels lost in fog;
 - 08-08-09 – New Quay ALB involved in a major search and Barmouth ALB tasked to a broken-down boat;
 - 22-07-13 – New Quay ALB tasked to a broken-down boat in fog, and then to a second boat lost in fog. Barmouth ALB tasked to assist a yacht with engine failure.
- This highlights the way in which search and rescue provision will be weakened by introducing such a large gap between all-weather lifeboat stations. The capability to deal with multiple incidents such as this will be severely restricted from 2020.

3 CONCLUSIONS

- Analysis of Return of Service data for a 10-year period (2007 to 2016) clearly demonstrates the need for an all-weather lifeboat in New Quay, and shows significantly higher ALB demand in New Quay than in Barmouth.
- The RNLI's Plans and Purpose states:

"We aim to ensure our crews can reach at least 90% of all casualties within 10 nautical miles of the coast, within 30 minutes of a lifeboat launch – in any weather."

Under the current plan to downgrade New Quay lifeboat station, this aim will be unachievable in Ceredigion after 2020. This is confirmed by the RNLI's own data.

- The new Shannon class lifeboat, as the final part in the move towards a 25-knot fleet, was intended to improve coverage and response times. However, in Ceredigion, we will see a return to all-weather response times not seen since the 1970s and 80s. This places lifeboat crews and other seafarers in the sea area off New Quay and Aberaeron at an unnecessary level of increased risk. We do not consider this to be acceptable.
- The RNLI's data analysis is flawed and inadequate and it has failed to demonstrate that, as a result of the proposed change in lifeboat configuration, the risk is reduced to, or maintained at as low as reasonably practicable (ALARP).
- **In the absence of any operational justification for the proposed change, it is our contention that the change is premised entirely on the cost differential between modifying Barmouth's lifeboat station and modifying New Quay's lifeboat station in order to accommodate a Shannon class lifeboat. We challenge the RNLI to prove otherwise.**