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Döhle and Costamare want thumbs-up for million-slot boxship giant

by David Osler

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Hamburg-based joint venture plan awaits regulatory approval



The new Döhle-Costamare entity would be based in Hamburg and would thus be a powerful counterweight to Hanseatic Unity Chartering.

overtake Seaspan, which had some 830,000 teu on its books as of last month.

The new Döhle-Costamare entity — a rare example of collaboration between the German and Greek shipping communities — would be based in Hamburg, with Costamare sending its staff to work in the German shipping capital, according to local media reports.

The JV would thus be a powerful counterweight to Hanseatic Unity Chartering, formed last October, which combined the dry bulk and containership interests of Borealis Maritime and Reederei Nord/Bernhard Schulte joint venture O&S Chartering.

In July, Leonhardt & Blumberg and Asiatic/Atlantic Lloyd signed up to the platform, bringing the combined fleet to 233, including 206 boxships.

Developments such as these highlight the rapidly quickening pace of consolidation in the NOO sector, which is still coming to terms with the unexpected cataclysmic collapse of top 10 player Rickmers Holding.

Once world leaders, German NOOs are coming under increasing pressure from their peers in other countries.

The country's share of the global containership charter market fleet fell from 61% in 2008 to only 48% as of 2015, as North American, Japanese and Greek rivals began increasingly to encroach on their turf.

Factors at work include the disposal of older tonnage, either on grounds of age or because of arm-twisting from the banks, and a reluctance to order, or inability to pay for, new units.

There has also been an ongoing contraction of the NOOs' customer base. Ten years ago, there were more than 30 tier

BIG name non-operating owners Döhle and Costamare are seeking regulatory approval for a chartering brokerage joint venture that could become the largest such operator in the world overnight, with almost 1m slots under its command. The two companies already rank at number two and three in the sector respectively, on the most recently-available Clarksons data.

If the deal gets the green light from competition watchdogs, the combined entity's 937,000 teu firepower would effortlessly

one liner companies and a wide range of feeder companies underneath them, making it easy to place ships. Today, the liner world is centred on just three major alliances.

In this light, Döhle's decision to opt for a cross-border partnership with a Greek outfit, rather than another German company, highlights possible scope for further international co-operation.

Neither Döhle nor Costamare had responded to requests for confirmation and comment at the time of writing.

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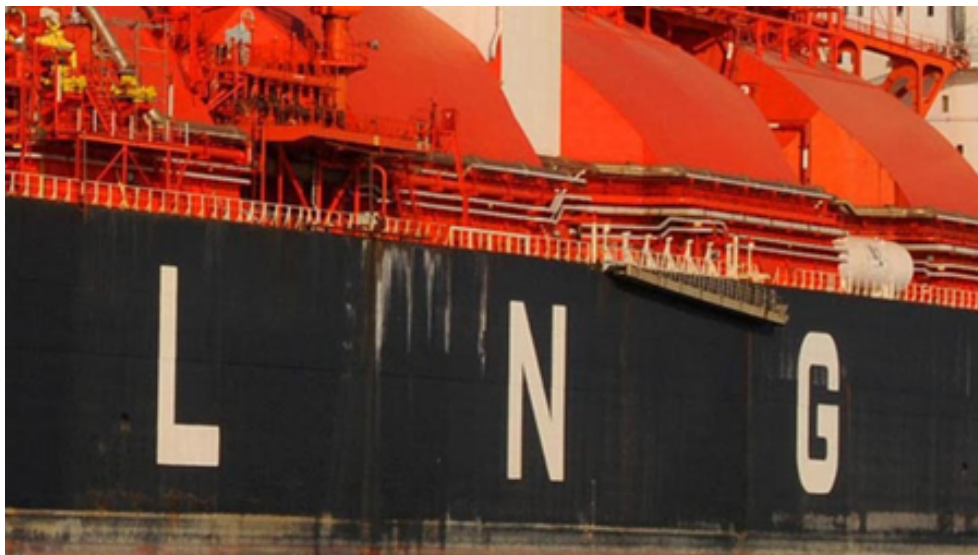
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Manufacturers press US government to curb LNG exports

by Wei Zhe Tan

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Industrial Energy Consumers of America seeks to halt further LNG export approvals to non-free trade agreement countries



Continued LNG exports could increase domestic prices and hit manufacturing jobs, US industry group claims.

feedstock and natural gas-powered electricity generation, were increasingly concerned over the volume of LNG exports that were given the green light for the next 20-30 years, particularly to non-free trade agreement nations.

It presented two scenarios in which such export volumes could leave the nation with limited amounts of LNG for domestic consumption.

The first takes the Energy Information Administration's Annual Energy Outlook 2017 which forecasts LNG exports increasing to 12.1bn cu ft per day by 2035 from 1.4bn cu ft per day in 2017.

US MANUFACTURERS are calling on their government to prohibit further approvals of liquefied natural gas exports to non-free trade agreement nations, potentially putting a damper on what many in gas shipping are expecting to be a key demand driver for the sector.

In a letter sent to US Department of Energy Secretary Rick Perry, the Industrial Energy Consumers of America said its members, which comprise major manufacturing consumers of natural gas, natural gas

"This scenario illustrates that... 58% of all US technically recoverable natural gas resources are consumed by 2050, only 33 years," said the IECA.

The second scenario also uses the EIA forecasts but adds on volumes of LNG export applications equivalent to 54bn cu ft per day which had already been approved by the Department of Energy.

Looking at the EIA's average annual forecast rise in LNG exports of 1.58bn cu ft per day between 2016-2020 as well as the same growth rate for the period after 2020 until export volumes hit 54bn cu ft per day, 71% of all US technically recoverable LNG could be used up by 2050.

"The facts are troubling and as stated earlier give justification to halt further approvals for shipments to NFTA countries," the IECA said.

It said that the Obama administration's DOE studies on LNG exports did not take into account cumulative export volumes to free trade agreement and NFTA nations and thus downplayed the negative impact on US manufacturers and jobs.

"The net effect is that LNG exports, specifically to NFTA countries, lowers our competitors' costs and increases ours, directly and negatively impacting competitiveness and our ability to justify reshoring."

Additionally, the industry association claimed that the LNG production and export sector was not a substantial creator of US jobs and could lead to long-term job losses in the manufacturing sector.

"When making a comparison to manufacturing, for example, according to the US Bureau of Labour Statistics, from 2010 to 2016, the entire oil and gas industry created only 21,000 jobs. During that same time, the manufacturing sector created 820,000 jobs. Manufacturing can create eight times more jobs using natural gas rather than exporting it," said the IECA.

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US Treasury settles Iran sanctions violations with freight forwarder

by Eric Yep

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American Export Lines agrees to pay \$518,063 for transshipping used cars and car parts via Iran



FREIGHT forwarding company American Export Lines has agreed to pay \$518,063 to settle Iran sanctions violations with the US Department of the Treasury's Office of Foreign Assets Control, according to an official notification.

From roughly April 25, 2010 to June 2, 2012, Blue Sky Blue Sea Inc, which was doing business as American Export Lines and International Shipping Company USA, transhipped used and junked cars and parts from the US via Iran to Afghanistan on 140 occasions,

American Export Lines did not voluntarily self-disclose the apparent violations.

Source: Shutterstock

the Treasury Department said.

The activity was in violation of the Iranian Transactions and Sanctions Regulations, which are implemented by the Office of Foreign Assets Control.

The OFAC said AEL did not voluntarily self-disclose the apparent violations, which had a potential penalty ranging from \$1.535m to \$35m.

AEL "demonstrated a reckless disregard for US sanctions requirements by failing to exercise a minimal degree of caution or care in transshipping goods through Iran" and its senior management "knew and approved of the transshipments via Iran", the OFAC said.

However, it said mitigating factors for AEL included the fact that the goods did not appear to have had an end use in Iran and AEL's small business size meant that the violations constituted less than 1% of its total shipments during the period.

In March this year, Lloyd's List reported that shipowners who entered the Iranian trade after the lifting of sanctions in late 2015 are deploying only a portion of their fleet to the trade, amid fears that exposing the entire fleet will become problematic if Washington decides to clamp down again.

For many owners, the Iran business has reverted to the status of high uncertainty that prevailed immediately after the Joint Comprehensive Plan of Action was adopted in October 2015, and when the shipping industry was unsure of how to proceed.

Most of the progress made through 2016 in opening up trade with Iran, including greater willingness for vessels to call at Iranian ports, facilitated by easier marine insurance, has been jettisoned since the Trump administration came into power.

In June, the US Treasury enacted sanctions against a Chinese shipping firm for conducting business activities with North Korea in breach of UN Security Council resolutions.

Dalian Global Unity Shipping was slapped with a sanction designation under the OFAC for operating in North Korea's transportation industry.

The US authorities said the shipping company was reported to have transported 700,000 tonnes of cargo, such as coal and steel, between China and North Korea annually.



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Fatal collision between warship and boxship caused by poor seamanship on both vessels, says US Navy

by Eric Yep

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Three senior officers on warship USS Fitzgerald relieved of their duties



A fearless response by the Fitzgerald crew after the accident prevented further loss of life, says the US Navy.

members were also held accountable, following an investigation into the incident.

The collision killed seven US naval personnel and caused significant damage to the warship, and triggered industry concerns about marine casualties.

Other bodies have looked into the incident including classification societies, insurance companies and the owner of *ACX Crystal*, Daiichi Invest Corp, but to date no crew member of the commercial vessel has been charged with wrongdoing or negligence in a public court.

The US Navy said that on *USS Fitzgerald*, "flawed watch stander teamwork and inadequate leadership contributed to

THE fatal collision between Philippines-flagged containership *ACX Crystal* and the warship *USS Fitzgerald* off the coast of Japan on June 17 was avoidable and both ships demonstrated poor seamanship leading up to the incident, the US Navy's 7th Fleet said early Friday. US Navy officials said in a statement that the commanding officer, executive officer and command master chief of the guided missile destroyer *USS Fitzgerald* had been relieved of their duties, and other crew

the collision”.

Commander Bryce Benson, who had “absolute accountability for the safe navigation of *Fitzgerald*” was relieved due to a loss of confidence in his ability to lead, while “inadequate leadership by the executive officer, Cmdr Sean Babbitt, and command master chief, Master Chief Petty Officer Brice Baldwin, contributed to the lack of watch stander preparedness and readiness that was evident in the events leading up to the collision”, the US Navy said.

It said several junior officers were also relieved of their duties due to “poor seamanship and flawed teamwork as bridge and combat information centre watch standers” while additional administrative actions were taken against members of both watch teams.

However, the fearless response of the *Fitzgerald* crew after the accident prevented further loss of life, the US Navy added. It did not say whether it had any findings regarding the actions of ACX *Crystal*'s crew.

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Consolidation comes to containership owners

by James Baker

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The proposed joint venture between Döhle and Costamare shows size does count for non-operating owners



Non-operating owners of containerships are finding strength in size.

results, as it was the ailing carriers that made life so difficult for owners.

As carriers fought for market share at a time of reduced demand, rates collapsed and earnings shrank. For carriers,

THE carnage that took place in container shipping over the last two years appears, at last, to be over, if initial first-half results are anything to go by.

But for containership owners, the struggle is still ongoing. One only needs to look at the fate of once-mighty Rickmers to realise that owning and chartering out containerships is a difficult business.

It is something of an irony that it is now the non-operating owners that are hurting, given the improvements in carriers'

there were a limited number of costs that could be cut, but one easy target was getting rid of unwanted chartered tonnage.

Owners, who in the early stages of the downturn sat comfortably on charter rates established before things went south, soon found those charters weren't extended. And when Hanjin Shipping went bust, there were suddenly an awful lot more ships available.

Navios's fire sale acquisition of the Rickmers Maritime Trust fleet when the Singapore-based panamax specialist went bust showed how dire things had become.

Earlier this year, Global Ship Lease chief executive Ian Webber told Lloyd's List that he did not believe there was any need for consolidation among non-operating owners. Profitability was predicated on the rates achieved for charters and there were few economies of scale to be achieved.

He pointed out that Seaspan, the world's largest non-operating owner of containerships, owns only 100 vessels, so there was room for smaller operators.

But the mood music appears to be changing. The news today that Döhle and Costamare are joining forces to form the largest single owner of charter tonnage indicates that scale has become important.

One reason for this is the massive sums of money required to buy the ultra large tonnage that carriers are now looking for. To date, Seaspan has half a dozen 14,000 teu vessels, compared to GSL, which has just one vessel over 10,000 teu.

It is here that scale becomes important. Gaining finance for ships of this size or larger is not easy, particularly at a time when charter rates are in the doldrums. But these are the very ships that carriers will be wanting to charter as their business picks up again.

This risk is that if non-operating owners do start ordering tonnage again, the delicate balance between supply and demand, which is just beginning to re-emerge, could be unsettled, and the whole sorry cycle will start again.

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Seadrill amends loan facilities in preparation for likely Chapter 11 filing

by Wei Zhe Tan

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Change strikes off subsidiary Seadrill Partners and its consolidated units as being listed as a borrower or guarantor of the respective loan facilities



NORWAY-listed Seadrill Ltd has made changes to terms of three of its credit facilities that cover rigs acquired by its subsidiary, as it looks to file for Chapter 11 bankruptcy protection in order to proceed with a proposed restructuring.

The amendments to the facilities will help prevent the assets under Seadrill Partners from being seized by any lenders looking to recoup loans made out to the John Fredriksen-linked company, by striking off the subsidiary and its consolidated units as a

The changes will protect John Fredriksen-linked Seadrill Partners if lenders were to try to seize any collateral to recoup loans.

borrower or guarantor.

They also split the loan facilities to ensure each one is secured only by Seadrill Ltd assets and not the rig assets owned by Seadrill Partners.

"This transaction is part of the company's comprehensive restructuring plan that is intended to preserve the value of its equity stakes in Seadrill Partners and its consolidated entities," said the company.

Seadrill said it was still in talks with third-party and related investors as well as secured lenders to iron out conditions for a broad recapitalisation exercise.

"As previously disclosed, we continue to believe that implementation of a comprehensive restructuring plan will likely involve Chapter 11 proceedings, and we are preparing accordingly."

It added that the proposed restructuring would possibly lead to significant impairment or conversion of corporate bonds, and impairment and losses incurred by other stakeholders, such as shipyards.

As such, Seadrill reiterated that shareholders would likely be unable to recoup much of their investments in shares of the company.

"The company's business operations remain unaffected by these restructuring efforts and the company expects to continue to meet its ongoing customer and business counterparty obligations."

Earlier in the week, the company said it amended the term credit facility provided by another subsidiary, Seadrill Eminence, to mature on September 14 this year, which "aligns the maturity of the facility with that of the company's \$400m credit facility and the revolving credit facility provided to North Atlantic Drilling Ltd, a majority owned subsidiary of the company, thereby providing an additional period for negotiations to continue with the company's bank group and other stakeholders over a comprehensive restructuring plan".

In July, Singapore-based Sembcorp Marine said its unit Jurong Shipyard (JSPL) had extended a standstill agreement reached with North Atlantic Drilling to January 6, 2018.

This will be the fifth time the agreement has been pushed back by both parties amid the prolonged weakness seen in the offshore oil and gas sector, with the previous extension to July 6 announced in January this year.

The vessel in question, the semisubmersible drilling rig *West Rigel*, will continue to be marketed by NADL for suitable employment while it remains at Jurong Shipyard.

In turn, the yard will look for buyers for the unit at an acceptable price.

Volatility in crude oil prices has continued to take its toll on the offshore oil and gas industry, with George Economou-led Ocean Rig UDW preparing to submit its debt restructuring plan to a court on September 4, after receiving a final vote of approval from its creditors to proceed.

If that is approved, the company has scheduled the effective debt restructuring date by the end of September. The dismal operating climate has also led to a period of industry consolidation, the latest example being Transocean, the largest drilling company in the world by market capitalisation and fleet size, agreeing to buy Norwegian company Songa Offshore for a total of about \$3.4bn, giving it access to long-term contracts with oil major Statoil.

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Vopak's Malaysia terminal expansion to boost tanker traffic

by Eric Yep

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MR and LR clean product tankers to benefit



Pengerang Independent Terminals: Nearly one third of global seaborne petroleum trade transits the Strait of Malacca.

Terminals is strategically located next to Asia's main oil trading centre in Singapore, along international shipping routes

DUTCH oil storage major Royal Vopak's plan to expand its deepwater fuel storage terminal in southern Malaysia by the first quarter of 2019 will be a major boost to tanker traffic in the busy sea lanes of the Strait of Malacca adjacent to Singapore. Vopak plans to expand the terminal's capacity by 430,000 cu m to a total capacity of 1.7m cu m, mostly for clean petroleum products, which would benefit clean product tankers such as medium range and long range vessels. The Pengerang Independent

and connected to the Petronas-backed oil refinery and petrochemical complex under construction.

Malaysian oil storage company Dialog has a 45.9% stake in the terminal, Vopak has a 44.1% stake and the state government of Johor Darul Ta'zim has a 10% stake in the facility, which has the capability to accommodate very large crude carriers and the largest liquefied natural gas carriers such as Q-Max vessels.

The terminal's expansion is supported by growing demand for clean fuels in Asia, including the sulphur caps on marine fuels set by the International Maritime Organization from 2020 onwards.

Oil terminals are core to the operations of petroleum hubs such as Singapore, Fujairah and Rotterdam, which become key loading and delivery points for crude oil and petroleum tankers, as storage hubs are used extensively by oil companies, traders and refiners.

The state-run Petronas-backed oil refinery in Malaysia will have a capacity of 300,000 barrels per day, making it one of the largest refineries in the region. This will call for dirty tankers that supply crude to the refinery as well as clean tankers that are used to export products such as diesel and gasoline.

New oil refineries are the primary driver of tanker demand and fundamental to tanker tonne-miles.

Singapore is expanding as an oil and tanker trading hub with the construction of numerous storage sites in neighbouring islands of Malaysia and Indonesia, contributing to heavy vessel traffic in the region. The Strait of Malacca is the second-largest oil trade chokepoint in the world after the Strait of Hormuz.

Nearly one third of the 61% of total global petroleum and other liquids production that moved on maritime routes in 2015 transited the Strait of Malacca, and volumes rose for the fourth time in the past five years in 2016, reaching 16m barrels per day, according to the US Energy Information Administration.

The Strait of Malacca is the shortest sea route between oil suppliers in the Middle East and West Africa, and Asian heavyweights China, Japan and South Korea, which get up to 90% of petroleum flows through this chokepoint.

"If the Strait of Malacca were blocked, nearly half of the world's shipping fleet would be required to reroute around the Indonesian archipelago, such as through the Lombok Strait between the Indonesian islands of Bali and Lombok or through the Sunda Strait between the Indonesian islands of Java and Sumatra," the EIA said.

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Intra-Asia carrier SITC posts 20% rise in net profit to \$85m

by Cichen Shen

Volume has substantially improved but freight rate has declined slightly during the first half



SITC International Holdings, the intra-Asia box carrier and logistics firm, reported a 20% year-on-year increase in net profits to \$85.1m for the first half of 2017, with improving market conditions.

Total revenues went up by 6.8% to \$604.3m for the six months.

The improvement came with growth in lifting volume yet a decline in freight rate.

Revenues of SITC's sea transport segment amounted to \$520.5m, representing a 10.8% increase year on year. At the

SITC operates a fleet of 72 boxships with a total capacity of 94,882 teu.

same time, container shipping volume rose 14.9% to nearly 1.3m teu while the average freight rate dipped to \$388.10 per teu from \$399.30 teu for the first half of 2016.

Revenues of the company's land-based logistics business climbed 9.4% to \$375.8m. Freight forwarding volume picked up to 900,213 teu from 817,434 teu, whereas the average freight forwarding rate edged down to \$341.40 per teu from \$342.30 per teu.

As of end-June, SITC ran ships on 59 trade lanes, including 10 trade lanes through joint services and 21 lanes through container slot exchange arrangements.

These services cover 63 major ports in mainland China, Japan, South Korea, Taiwan, Hong Kong, Vietnam, Thailand, the Philippines, Cambodia, Indonesia, Singapore, Malaysia and Brunei.

SITC operates a fleet of 72 vessels with a total capacity of 94,882 teu. Of these, 47 vessels of 62,060 teu are self-owned, while 25 ships of 32,822 teu are chartered in.

The average age of the fleet is 8.8 years.

Between January and June, \$800,000 out of \$4.6m of paid out capital expenditure was attributable to vessel purchases, SITC said.

"The company will continue to purchase container vessels and/or containers and invest in land-based logistic projects, as and when appropriate," it added.

Earlier this week, SITC announced it had ordered four 1,011 teu gearless boxships at South Korea's Daesun Shipbuilding for \$68m — two on exercised options and two on new orders.

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China Merchants Port issues \$150m loan to develop Djibouti facilities

by Wei Zhe Tan

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Loan with one-year maturity will be made to Djibouti Asset Company



HONG Kong-listed China Merchants Port Holdings has inked a deal to issue a \$150m loan to Djibouti Asset Company for the purpose of developing port-related facilities. DAC is an affiliate of CMPH's parent company China Merchants Group. The loan has a one-year maturity date which can be extended by subsequent one-year periods not exceeding a total of 10 years, if both parties should choose to do so.

Additionally, the loan is secured

Djibouti Asset Company will reissue the loan to Port De Djibouti.

by a 15.3% stake in Port De Djibouti (PDSA) owned by Great Horn Investment Holdings which is a unit of the Djibouti Ports & Free Zones Authority.

Subsequently, DAC will reissue the loan to Port De Djibouti on similar terms with DPFZA acting as the guarantor. Port De Djibouti is the country's privatised port operating entity.

"PDSA shall apply all amounts borrowed under the DAC loan facility towards development, upgrading and operation of its facilities and assets in Djibouti," said CMPH in a statement.

The terms of the loan facility were agreed upon after arm's length discussions and with reference to the coupon rate of CMPH's 10-year guaranteed noted issued in 2015.

"The directors, including the independent non-executive directors, are of the view that, whilst the entering into of the loan agreement is not in the ordinary and usual course of business of the group, the loan agreement has been entered into on normal commercial terms and that the terms are fair and reasonable and in the interests of the company and its shareholders as a whole," it said.

In January, China Merchants Group subsidiaries CMPH, Cheer Signal and China Merchants Investment Development Co formed an asset joint venture to invest \$30m for a 30% stake in Djibouti International Free Trade Zone.

Great Horn and Dalian Port Group held 60% and 10% stakes respectively in the venture, which will fund and develop commercial and infrastructure projects in the free trade zone.

In May this year, Djibouti's \$590m Doraleh Multipurpose Port was opened for operation.

Work started in 2015. The now completed 690 ha port was jointly funded by DPFZA and CMPH to create a vital link between Asia, Africa and Europe.

The port is one of four in the country that is being funded by Chinese authorities through state-owned enterprises such as China Merchants Group.

China is also building a naval base in the country, which hosts large US and French naval installations.

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By the seaside

by Michael Grey

Opposition to plans to dredge Kent's Goodwin Sands is misguided and costly folly



The beach at Deal in Kent near Goodwin Sands, where a controversy is waging over dredging plans.

Source: Shutterstock.com

WITHIN my battered volume of *Shipping Wonders of the World*, published between the wars, there is a long article about the Goodwin Sands. The sheer horror emerging from that “graveyard of ships” resonates from every paragraph, the author laying it on thickly about whole fleets of ships sheltering in the Downs anchorage, caught by unexpected storms and dashed on to the sands, to be smartly swallowed up. Ships beating about in thick weather would have little chance of survival if their navigation had

been awry, the Deal boatmen enjoying alternative roles as lifesavers and looters of the doomed vessels. People have more idea about their location today, while the excellent Maritime and Coastguard Agency overseers of the Straits ensure that what was once a location to be dreaded is no longer feared. Perhaps that is one of the reasons we are rather romanticising the Goodwins, with cheery pictures of brief cricket matches upon them when the tide is exceptionally low, or the excitement generated by ancient timbers occasionally exposed, as the sands come and go. You would not think the plans drawn up by the Dover Harbour Board to dredge some of the sands so conveniently located would have generated such a fuss in this part of Kent. It is the most cost-effective way of finding fill for the reclamations in the port's Western Docks, where there are ambitious and arguably long overdue development plans in progress. If they had proposed such a strategy a century or so ago, it would have been hailed for its excellence, by the

marine community and just about everyone, except, perhaps, the Deal boatmen.

It is not as if they are going to completely remove the sands, leaving the white cliffs exposed to the wrath of every easterly gale. A tiny percentage of this gritty burden would be shifted from its ever-moving location to a more permanent home in the docks, where it will contribute directly to the prosperity of the UK's biggest ferry port. What is there not to like about a scheme designed to provide more employment and wealth in a region that could do with a bit of both?

You would not think that something that is only visible at low tides and is otherwise featureless would generate such support in the community. But the Goodwin Sands have acquired all sorts of friends in recent months, who are piling in to prevent the port nibbling away at this mostly underwater "heritage". There is a Save Our Sands campaign up and running, in which various green activists and conservationists are joined by various luvvies and local celebrities, demanding that the sand suckers go elsewhere for their overburden.

Plausible reasons

A whole range of plausible reasons for prohibition have been advanced, ranging from the protection of invertebrates and other sea creatures, the need to avoid frightening the seals and suggesting horrible environmental effects. The bones of drowned mariners and crashed wartime aircrew have been advanced for their totemic value in preventing such desecration by dredgers. There are demands the whole area should be designated a Marine Conservation Zone so that all may rest in peace. The Marine Management Organisation, which one might have surmised could have expected a relatively easy ride on such a simple sand-shifting application, now finds it is facing the wrath of people who know how to lobby. And as we have seen in previous applications for port expansion in these febrile times — from Harwich to the Humber, Southampton to the Severn — years and millions of pounds can be completely lost as public consultation gives way to public inquiries, with massed ranks of eminent QCs retained over what, in another age, would be simple civil engineering.

It is not Crossrail or HS2, the Channel Tunnel or Heathrow's third runway, for goodness' sake. It is about 2.5m cu.m of sand and gravel, which, you could almost guarantee the sea would replenish in a short while. The intention is to use it for undeniable social good in the port of Dover, a town that deserves a bit of a renaissance and has fought hard over the years to survive the disappearance of the Kent coalfields and the arrival of the fixed link.

My informants tell me the opposition is being organised by "interests" in Deal, although I would doubt it is the ancestors of the piratical Deal boatmen getting their revenge for better position finding and mechanical propulsion. And these days "conservationists" are able to multiply like amoeba, the old Rent-a-Mob being much modernised by social media. Could Dover access the mud it needs from elsewhere? Possibly it could, but at a cost that rises very fast with distance, and the Goodwins are on its doorstep. And there is no guarantee that some gang of activists will not be on hand close to any alternative location to protest that their heritage, war graves, natural environment and molluscs are being menaced by the sharp teeth of the dredger dragheads. I suppose an opportunity was lost when the tunnel was excavated, because all that clay and chalk would have been ideal, but the times sadly did not coincide.

Anyway, the summer is going, down by the seaside, and soon everyone will be digging in. But sadly, not on the Goodwin Sands. We must hope that they do not become a graveyard of development plans as they once were for ships and their hapless mariners.

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> **Last Word: Lest we forget**

> **When greed was good**



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