

<<OLDEST EMAILS AT THE BOTTOM – Read from the bottom up.>>

Thu 30/07/2026 14:27

Dear Joe,

Thank you for your emails and for setting out your questions in detail.

To ensure we address each point accurately, we have reproduced your questions below and have provided our responses beneath each point.

Q1. Inspection of components beyond the Brow Flap system

"Can you explain the rationale for disassembly and inspection of components in the primary load path (i.e. why extend the disassembly and inspection beyond the Brow Flap system)? Is this precautionary; a regulatory requirement; in some way related to the failure of the brow flap system; triggered by inspection returns, or the consequence of some other failure event, or something else?"

A1. The rationale for considering disassembly and inspection of components in the primary load path is related to the investigation findings following failure of the brow flap system and is a consequence of the most probable explanation of the failure event.

The investigation of the failure appears to indicate that an electrical fault in the three phase system caused the direction of rotation of the electric motors on the PAS to be reversed. Due to this, when operated, the wire ropes in the operating system of the main platform of the PAS slackened. One or more wire ropes then appear to have suddenly dislodged causing shock loading of both the main PAS operating system and the attached Brow Flap operating system; this appears to have been the cause of failure of the small sheave assembly on the Brow Flap operating system (which was also showing signs of corrosion).

This exceptional incident justifies a thorough examination of all parts affected and some parts would require to be disassembled to complete this as they are not fully visible and therefore not able to be fully inspected without disassembly.

Q2. Replacement of the four main operating wire ropes

"Can you explain the rationale for replacement of the four main wire ropes? Is this a routine replacement due to age and condition; precautionary; a regulatory requirement; in some way related to the failure of the brow flap system; or the consequence of some other failure event, or something else?"

A2. The rationale for considering replacement of the four main operating wire ropes is also based on the apparent failure mechanism noted in A1 above. At least one of the

main operating wire ropes appears to have suffered some visible damage where it became dislodged from its winch drum and therefore requires to be replaced.

In order to complete work in the most efficient manner with regard to costs, contractor resources and minimising possible future outages it would have been appropriate to replace all the main operating wire ropes at the same time as the damaged wire rope, irrespective of the outcome of any thorough examination of the other three main operating wire ropes for the PAS Platform.

Q3. Retention of the PAS versus an alternative gangway solution

"Your answer to question 3 misses the point made. Sure, gangways are not inherently unsafe. But a gangway will be inherently less safe than the PAS system. CMAL are proposing to replace one system with another, and as a result the overall risk to passengers and staff will increase. If, as we believe, there is no regulatory requirement for you to remove the existing PAS, that save for want of a minor repair, conforms to applicable regulations, then it could perhaps be argued by a claimant that injuries had been caused or worsened as a result of CMAL's decision to replace a compliant PAS with a less-safe alternative. Consideration of the wider safety case would surely conclude that the safest ALARP-compatible solution is to retain the PAS, unless there is some regulatory or disproportionate commercial impediment to doing so."

A3. Used correctly gangways are not inherently less safe than proprietary or bespoke passenger access systems, indeed the bespoke PAS at Craignure includes a gangway section as part of the overall machine. Use of gangways in accordance with SIP014 Guidance on Safe Access and Egress in Ports, as undertaken at many ports across the network, and indeed the world, poses lower overall regulatory risk than retaining the current PAS without refurbishing to meet current safety standards intended to protect both users and machine operators.

Q4. Regulations and standards

"Most importantly, I don't think my fourth question has been answered, and related answers seem to be somewhat contradictory. I asked exactly which parts of which regulations have led you to conclude that the correct response to the faulty winch issue is to bring the entire PAS up to current safety standards. I asked exactly which parts of which regulations have led you to conclude that the correct response to the faulty winch issue is to bring the entire PAS up to current safety standards."

A4. Parts 3 & 4 of the Supply of Machinery (Safety) Regulations 2008, relating to conformity assessment, marking and labelling, as referred to in HSE guidance on "Refurbished and modified machinery", lead CMAL to conclude that the refurbished assembly would be required to comply with current safety standards in order to obtain a certificate of conformance.

Q5. Repair versus refurbishment or modification

"Repair or replacement of the brow flap winch is maintenance that will return the machine to its as-built condition. It's a like-for-like repair. You have referenced BS 6349-8. I've read through the relevant parts of the standard, and the extracts you have quoted are all in respect to refurbishment or modification. I don't think that by any reasonable interpretation repair or replacement of a minor winch constitutes refurbishment or modification. I can find nothing in these standards to suggest that repair to as-built condition of a system that was built prior to these standards would somehow now bring the entire system into scope of BS 6349-8 or any other regulation that came into force after the system was installed."

A5. As outlined previously and in the answers above, the works required to be undertaken extend beyond repair or replacement of a minor winch. Parts and systems that may have been modified, or which could have been affected, would need to be reassessed. BS 6349-8:2007 and Supply of Machinery (Safety) Regulations 2008 were both in place at the time the current PAS was installed.

Q6. CMAL's position on the nature of the works

"By quoting from the regulations as you have done, is it your position that the repair of the brow flap winch to its as-built condition is refurbishment or modification?"

A6. CMAL's understanding of HSE Guidance on "Refurbished and modified machinery" is that the works required, and those that would be reasonably undertaken at the same time to reduce overall risk ALARP, are refurbishment.

Q7. Supply of Machinery (Safety) Regulations 2008

"For clarity, the "You" in the reference below would be the manufacturer or supplier of the machinery when designing, not the owner or operator(CMAL):

You will need to comply with the Supply of Machinery (Safety) Regulations 2008 if machinery has been transformed or rebuilt so substantially that it can be considered as new, or a substantial new attribute has been added that was not assessed previously. For example, these Regulations apply when CNC controls are retrofitted to an older manual lathe, or a lifting machine is modified to lift a significantly greater load."

Since replacement/repair of the Brow Flap mechanism to its as-built condition is not adding a new attribute, the Supply of Machinery Regs are not relevant. Or is it your contention that restoring the brow flap system to its as-built condition is a such a substantial transformation that the PAS should be considered as new?

A7. It was concluded that the parts and systems to be modified, or which could have been affected, would need to be reassessed and any rebuild would have been substantial.

Q8. 2011 PAS Design

“Regarding this “Several aspects of BS 6349-8 2007 were not addressed when the PAS was designed and manufactured and would require to be addressed as part of any refurbishment”

Are you saying that when installed in 2011, the PAS did not comply with the regulations in force at the time? Specifically, are you saying that the lift tower that was designed and built new was not compliant?”

A8. The current PAS, installed in 2011, was designed as a “temporary stop gap” until A&BC designed, procured and installed a permanent PAS. Despite best efforts, in the short timescale and with limited budget, the delivery team were unable to obtain a certificate of conformance, and the replacement PAS was not CE marked.

In the intervening period, since 2011, CMAL managed this situation by ensuring the PAS was regularly inspected and maintained, addressing critical safety compliance recommendations, and reducing the residual operational and user risk as low as reasonably practicable.

Your final point is not a question; however, we felt it worth addressing.

“The central point remains that neither we nor the professionals we have consulted can see any reason why repair or replacement of the Brow Flap mechanism to its as-built condition brings the PAS into scope of regulations introduced subsequent to its first construction. Therefore, we can see no justification for retirement of the PAS on the grounds that it is uneconomic to bring it up to current standards.

I hope we can come to a positive conclusion on this as soon as possible. The ongoing inconvenience, reduced safety and service delays are intolerable, and the prospect that Craignure will operate without a fully functioning PAS for years to come is unacceptable and unjustified.”

As noted in answers A4, A5, A6 & A7 above, the works that would have been required to bring the refurbished parts and systems up to latest design standards and requirements are estimated to be nearly as costly as the installation of a new PAS, which is clearly uneconomic.

We trust the above captures your queries accurately.

We hope to be in a position to give a further general update on the Craignure PAS next week, although it is worth re-iterating that, whilst not taken lightly, we have taken the decision, supported by the CMAL Board, to decommission and remove the PAS from Craignure pier.

Best regards,

Ramsay Muirhead, Director of Port Infrastructure and Planning, CMAL

Operations Team

operations

operations@cmassets.co.uk



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From: Joe Reade <>

Sent: 20 July 2026 11:18

To: operations <>

Cc: [redacted]

Subject: RE: 28/06/26 FOI - Craignure PAS

Dear Ramsay

As suggested in my previous email, I have a few more queries for you –

For clarity, the “You” in the reference below would be the manufacturer or supplier of the machinery when designing, not the owner or operator(CMAL):

You will need to comply with the Supply of Machinery (Safety) Regulations 2008 if machinery has been transformed or rebuilt so substantially that it can be considered as new, or a substantial new attribute has been added that was not assessed previously.

For example, these Regulations apply when CNC controls are retrofitted to an older manual lathe, or a lifting machine is modified to lift a significantly greater load.”

Since replacement/repair of the Brow Flap mechanism to its as-built condition is not adding a new attribute, the Supply of Machinery Regs are not relevant. Or is it your contention that restoring the brow flap system to its as-built condition is a such a substantial transformation that the PAS should be considered as new?

Regarding this *“Several aspects of BS 6349-8 2007 were not addressed when the PAS was designed and manufactured and would require to be addressed as part of any refurbishment”*

Are you saying that when installed in 2011, the PAS did not comply with the regulations in force at the time? Specifically, are you saying that the lift tower that was designed and built new was not compliant?

The central point remains that neither we nor the professionals we have consulted can see any reason why repair or replacement of the Brow Flap mechanism to its as-built condition brings the PAS into scope of regulations introduced subsequent to its first construction. Therefore we can see no justification for retirement of the PAS on the grounds that it is uneconomic to bring it up to current standards.

I hope we can come to a positive conclusion on this as soon as possible. The ongoing inconvenience, reduced safety and service delays are intolerable, and the prospect that Craignure will operate without a fully functioning PAS for years to come is unacceptable and unjustified.

I look forward to hearing from you.

Best regards

Joe



Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

From: operations <>

Sent: 17 July 2026 09:50

To: Joe Reade <>

Cc: [redacted]

Subject: Re: 28/06/26 FOI - Craignure PAS

Joe,

Thank you for your follow up email.

We are reviewing your queries and will revert to you next week.

Best regards,

Ramsay Muirhead

operations

operations@cmassets.co.uk



**Caledonian Maritime Assets Limited, Municipal Buildings, Fore Street, Port
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From: Joe Reade < >
Sent: 15 July 2026 15:00
To: Ramsay Muirhead < >
Cc: [redacted]
Subject: RE: 28/06/26 FOI - Craignure PAS

Dear Ramsay

Thank you for the response. I have forwarded your emails for some professional outside advice and further consideration, so this email may not be the full extent of my response.

For now, I would be grateful if you can please clarify some points:

You say in A2 that the scope of work includes:

- Dismantle and fully inspect components in the primary load paths of the main PAS operating system and the Brow Flap operating system, including non-destructive testing of all primary structural elements

Can you explain the rationale for disassembly and inspection of components in the primary load path (ie why extend the disassembly and inspection beyond the Brow Flap system)? Is this precautionary; a regulatory requirement; in some way related to the failure of the brow flap system; triggered by inspection returns, or the consequence of some other failure event, or something else?

- The four main operating wire ropes for the PAS Platform should be replaced

Can you explain the rationale for replacement of the four main wire ropes? Is this a routine replacement due to age and condition; precautionary; a regulatory requirement; in some way related the failure of the brow flap system; or the consequence of some other failure event, or something else?

Your answer to question 3 misses the point made. Sure, gangways are not inherently **unsafe**. But a gangway will be inherently **less** safe than the PAS system. CMAL are proposing to replace one system with another, and as a result the over-all risk to

passengers and staff will **increase**. If as we believe there is no regulatory requirement for you to remove the existing PAS (that save for want of a minor repair, conforms to applicable regs), then it could perhaps be argued by a claimant that injuries had been caused or worsened as a result of CMAL's decision to replace a compliant PAS with a less-safe alternative. Consideration of the wider safety case would surely conclude that the **safest** ALARP-compatible solution is to retain the PAS. Unless there is some regulatory or disproportionate commercial impediment to doing so.

Most importantly - I don't think my fourth question has been answered, and related answers seem to be somewhat contradictory.

I asked ***exactly which parts of which regulations have led you to conclude that the correct response to the faulty winch issue is to bring the entire PAS up to current safety standards.***

Repair or replacement of the brow flap winch is **maintenance** that will return the machine to its as-built condition. It's a like-for-like repair. You have referenced BS 6349-8. I've read through the relevant parts of the standard, and the extracts you have quoted are all in respect to **refurbishment or modification**. I don't think that by any reasonable interpretation repair or replacement of a minor winch constitutes refurbishment or modification. I can find nothing in these standards to suggest that repair to as-built condition of a system that was built prior to these standards, would somehow now bring the entire system into scope of BS 6349-8 or any other regulation that came into force after the system was installed.

By quoting from the regulations as you have done, is it your position that the repair of the brow flap winch to its as-built condition is **refurbishment or modification**?

I look forward to hearing from you.

Best regards

Joe



Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

From: operations <>

Sent: 13 July 2026 16:47

To: Joe Reade <>

Cc: operations <>

Subject: Re: 28/06/26 FOI - Craignure PAS

Dear Joe,

Thank you for your email and for your further comments regarding group email boxes. Going forward, we are content to include individual names in correspondence where helpful. Please continue to direct communications to the appropriate general mailboxes where they will be monitored and responded to more efficiently and effectively, as previously outlined.

Answers to your questions are below:

Q1 - Would the HSE really treat the entire PAS as a single system? Or could an argument be made that the lifting platform (of which the linking walkway is a part) is one discrete unit, and it is that which you are returning to 'as built' condition?

A1 – [HSE Guidance on Linkspans and walkways](#) directs the reader to [BS 6349-8 Maritime structures - Code of practice for the design of Ro-Ro ramps, linkspans and walkways](#) which is currently under review with the proposed revision available in draft format. The following extract is taken directly from Section 14.3.1 of the draft document:

HSE guidance states: "You will need to comply with the Supply of Machinery (Safety) Regulations 2008 if machinery has been transformed or rebuilt so substantially that it can be considered as new, or a substantial new attribute has been added that was not

assessed previously. For example, these Regulations apply when CNC controls are retrofitted to an older manual lathe, or a lifting machine is modified to lift a significantly greater load.”

Further guidance states: “Where the machine is large and complex, the part modified may not affect other parts of the machine. In this case, only the parts and systems modified, or which could have been affected, need to be reassessed. The other parts not affected do not need a new conformity assessment, but the assessment of what is not affected should be included in the technical file.”

Based on this guidance from the HSE in the Code of Practice, we and our consulting engineers conclude that the PAS is a single machine. The answers to Q2 and Q4 gives more information on this.

Q2 - Solutions to repair or replace the walkway winch could be presented to HSE for prior approval, so that questions of regulatory compliance are addressed by the ultimate authority now, prior to any potential injury claim? Such approval could be supported by third party engineering / compliance opinion.

A2 – While the known damaged element of the PAS at Craignure is a small sheave and mounting shaft that formed part of the operating mechanism for the brow flap, work required to restore the PAS to its previous state would include, as a minimum:

- Dismantle and fully inspect components in the primary load paths of the main PAS operating system and the Brow Flap operating system, including non-destructive testing of all primary structural elements
- A new small sheave and mounting shaft assembly should be manufactured and welded in place on the PAS
- A new wire rope for the Brow Flap should be installed
- The four main operating wire ropes for the PAS Platform should be replaced
- Commission and testing of the PAS

This would certainly come under the second part of HSE guidance above (A1) whereby the parts and systems modified, or which could have been affected, need to be reassessed. Of key concern in relation to the PAS at Craignure is that, due to the intended short working life at the time of installation, it was designed without detailed consideration given to failure modes or ease of maintenance. Several aspects of BS 6349-8 2007 were not addressed when the PAS was designed and manufactured and would require to be addressed as part of any refurbishment. As noted previously, our

assessment of this is that the cost of amending the PAS to meet the current standards is prohibitive.

Q3 - CMAL should consider whether they might actually be increasing their personal company liability, should a subsequent personal injury claim related to the use of the gangway be made. Would an injured claimant be able to demonstrate that CMAL replaced a safe PAS system with an unsafe gangway without due cause, or without consideration of the wider safety case?

A3 – Gangway access to vessels is undertaken at many ports across the network, and indeed the world, and is not inherently unsafe. Any gangway solution that may be implemented to replace the PAS would be assessed to ensure that any risks are reduced to As Low As Reasonably Practicable and in accordance with [SIP014 Guidance on Safe Access and Egress in Ports](#) as referred to in HSE Guidance on Linkspans and walkways.

Q4 - Can you please detail the regulations applicable to the PAS, and which parts of those regulations are the cause for concern? In other words, exactly which parts of which regulations have led you to conclude that the correct response to the faulty winch issue is to bring the entire PAS up to current safety standards?

A4 – As stated above HSE Guidance points to BS 6349-8:2007 Maritime structures - Code of practice for the design of Ro-Ro ramps, linkspans and walkways as the main standard relating to Passenger Access Systems (PAS)/ Seaport Boarding Bridges (SPBBs). The current standard is under review and the proposed revision, for public comment, is available on the BSI website.

CMAL recognise that the proposed update is not current, however it clearly describes how Ro-Ro ramps, linkspans and SPBBs should comply with Supply of Machinery (Safety) Regulations [Supply of Machinery (Safety) Regulations 2008, as amended by the Supply of Machinery (Safety) (Amendment) Regulations 2011] which are current. Specifically in this situation to the need for modification/refurbishment of machinery to meet modern standards:

“Under UK health and safety legislation it is required that risks should be reduced to As Low As Reasonably Practicable (ALARP); it should therefore be inferred that where reasonably practicable, refurbishments should fully meet current design standards. The

term ‘reasonably practicable’ should be inferred as introducing consideration of the associated sacrifice. To justify not including an alternative load path in refurbishment projects, it should be demonstrated that the cost/effort associated with incorporation is grossly disproportionate to the benefit of risk reduction. It is possible therefore to undertake a cost benefit analysis to substantiate this claim (HSE provide guidance on this), however, noting the magnitude of the risk consequence (loss of multiple lives), it is strongly recommended that all major refurbishments (i.e., replacement of main actuators and/or support structures), should meet the full requirements of this standard.”

We hope this covers all questions you have asked. Please be assured that we are working closely with Argyll and Bute Council, CalMac and all stakeholders to find the best possible solution. We are hoping to have a further update on a proposed solution within the coming weeks.

Best regards,

Ramsay Muirhead

Operations Team

operations



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From: Joe Reade <>
Sent: 09 July 2026 15:30
To: operations <>
Subject: RE: 28/06/26 FOI - Craignure PAS

Thank you Ramsay

Again I have to assume you are the author. How about sending from the operations email account, and just signing off "Ramsay Muirhead from the Operations Team".

Its totally fine to use group email boxes so that relevant colleagues have sight of communications. It is NOT acceptable for the author of those emails to be anonymous. It's not just discourteous and avoids accountability, but it does nothing for CMAL's reputation. It is to your benefit to sign off emails personally.

I look forward to the full answers on Monday.

Joe



Mull & Iona Ferry Committee

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Joe Reade, Chair.

From: operations <Operations@cmassets.co.uk>
Sent: 09 July 2026 15:14
To: Joe Reade <joe@islandbakery.scot>
Subject: Re: 28/06/26 FOI - Craignure PAS

Dear Joe,

Thank you for your follow up email below.

This has been passed on to the team to respond and we plan to have the response with you by the close of business on Monday 13th July.

Best regards,

Operations

On behalf of Ramsay Muirhead

operations

operations@cmassets.co.uk



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From: Joe Reade <j>

Sent: 08 July 2026 13:09

To: Ramsay Muirhead <>

Cc: FOI <FOI@cmassets.co.uk>; [redacted]

Subject: RE: 28/06/26 FOI - Caignure PAS

Dear Ramsay

These points remain unanswered:

From my email of 9th June:

Given the negative convenience, service and safety impacts of a gangway, we must insist that CMAL make more effort to find a solution that allows the current PAS to remain in operation.

- ***CMAL's interpretation of the relevant regulations should be checked by third parties, with the objective of finding a solution that addresses the liability issue AND maintains use of the PAS.***
- ***Your assumption that repair of the linking walkway winch will trigger an upgrade of the entire PAS system should be tested.***
 - ***Would the HSE really treat the entire PAS as a single system? Or could an argument be made that the lifting platform (of which the linking walkway is a part) is one discrete unit, and it is that which you are returning to 'as built' condition?***
 - ***Solutions to repair or replace the walkway winch could be presented to HSE for prior approval, so that questions of regulatory compliance are addressed by the ultimate authority now, prior to any potential injury claim? Such approval could be supported by third party engineering / compliance opinion.***
- ***CMAL should consider the wider safety case, not just the PAS in isolation. The obvious increase in passenger and staff risks that arise from the use of a gangway should be included in any representations made to the HSE.***
- ***CMAL should consider whether they might actually be increasing their personal company liability, should a subsequent personal injury claim related to the use of the gangway be made. Would an injured claimant be able to demonstrate that CMAL replaced a safe PAS system with an unsafe gangway without due cause, or without consideration of the wider safety case?***

In short, the case for removing the PAS is not based on passenger safety, but on company liability. If this was truly a safety case, then clearly the safest outcome is to keep the PAS in operation.

We look forward to a full response on the above, prior to any decisions being taken.

From my email of 15th June:

Can you please detail the regulations applicable to the PAS, and which parts of those regulations are the cause for concern? In other words, exactly which parts of which regulations have led you to conclude that the correct response to the faulty winch issue is to bring the entire PAS up to current safety standards?

The insistence that direct enquiries to relevant individuals receive anonymised responses or are hived-off into the FOISA process is totally unacceptable, and can only be interpreted as a deliberate attempt to obfuscate and restrict dialogue with relevant organisations **with whom CMAL have an obligation to consult**. FOISA is intended to enable public access to records and information held by relevant authorities. It is **not** a consultation mechanism. Many of the points above require an opinion or a subjective response from you. They are not requests for information or records. Doubtless many of the points would be refused answers under FOISA, because records will not be held for much of it. These are questions to you, not an FOI request.

So, please can we just get some straight-forward answers to these questions. They are fair and reasonable, they are directly relevant to the users that we represent, and they come from a legitimate Ferry Committee with whom you have an obligation to consult meaningfully and freely.

As per my email from earlier in the week, I will consider failure to respond to these questions by the end of the day today as refusal to answer. At the very least, I expect to be told today **when** you will answer these points.

Best regards

Joe



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Joe Reade, Chair.

From: FOI <FOI@cmassets.co.uk>
Sent: 08 July 2026 12:10
To: Joe Reade <joe@islandbakery.scot>
Cc: FOI <FOI@cmassets.co.uk>
Subject: 28/06/26 FOI - Craignure PAS

Dear Mr Reade,

28/06/26 FOI - Craignure PAS

Thank you for your email. Answers to your key questions are below:

Q1. “Was the lift tower built new in 2011?”

A1. Yes

Q2. “It seems to say that the hoist section of the PAS was constructed new in 2011. Designed by Halcrow, and built by George Leslie. Is that correct?”

A2. Yes. Based on the records held by CMAL, the PAS installed at Craignure in 2011 was designed by Halcrow and constructed by George Leslie. The hoist section was new; however, the tunnels were not.

Q3. “The PAS was new in 2011, but utilising some second hand parts. That it certainly different to what I understood, which was that all parts were second-hand.”

A3. Those works used a combination of newly constructed elements and second-hand components already owned by CMAL, including sections of the walkway. The lift tower formed part of the 2011 installation and was a new part.

-

Q4. “Please provide records that detail when the PAS was first installed and from where it came.

A4. The current PAS at Craignure was installed in May 2011 and was intended as a temporary solution to replace the previous PAS that was at end of serviceable life. The

PAS was installed by a contractor working for CMAL and comprised elements of spares that CMAL owned (the main tunnel sections).

Q5. “Please also detail who owned and was responsible for the PAS that it replaced.”

A5: CMAL owned and maintained the PAS at Craignure that was replaced in 2011, having taken over the maintenance from CalMac ferries limited in late 2009.

Response to further correspondence

“I’m going to persist in directing my emails to you personally, because you are the person responsible. I don’t think it is too much to ask to have fair and reasonable questions from a ferry committee answered directly by the official responsible, rather than being sent bland anonymised responses or having queries hived off in the FOISA process.”

Contact channels:

While you may wish to correspond directly with Ramsay, CMAL cannot rely on a single individual to manage all stakeholder enquiries. We handle enquiries through dedicated channels to ensure they are recorded, directed to the appropriate team, and answered consistently within the relevant timeframe. This is the required process for CMAL correspondence.

Key mailboxes include:

- **General enquiries:** Please use the info@cmassets.co.uk mailbox for general stakeholder correspondence.
- **Project enquiries:** Please use the relevant project mailbox for correspondence about a specific project, so the project team can track and respond to the enquiry appropriately. These can be found on the [project section](#) of our website.
- **Harbour operations enquiries:** Please use the operations@cmassets.co.uk mailbox for harbour-related matters only.
- **FOI requests:** (FOI@cmassets.co.uk) FOISA supports openness and transparency by ensuring requests are handled through a clear statutory

process, with responses based on recorded information. This is particularly important where historic matters are involved such as the PAS, as CMAL must rely on its records rather than staff recollection. It also enables Board oversight of stakeholder interests and emerging trends. We therefore ask that you utilise this process for formal information requests such as the above.

While individuals will have FOI responsibilities that are set out in their job descriptions (with very few exceptions) they are not directly accountable for delivering the majority of tasks or statutory responsibilities. These are corporate responsibilities and have to be managed as such – all guidance available on the [SIC's website](#) supports this.

Under the Freedom of Information (Scotland) Act 2002 (FOISA), public authorities can — and typically do — anonymize staff names in their responses. Whether a name is released depends on the staff member's seniority and the context of the request. CMAL typically anonymise responses for staff below Director level, particularly where our staff are not employed in public facing roles.

Have we missed anything?

We hope this covers all the questions you have asked. If we have missed anything, please get in touch via the dedicated channels above.

Best Regards,

Corporate Support Services/FOI

On behalf of Ramsay Muirhead

FOI

foi@cmassets.co.uk



**Caledonian Maritime Assets Limited, Municipal Buildings, Fore Street, Port
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From: Joe Reade <>
Sent: 03 July 2026 11:12
To: Ramsay Muirhead <>
Cc: FOI <FOI@cmassets.co.uk>; [redacted]
Subject: RE: 28/06/26 FOI - Craignure PAS DRAFT

Dear Ramsay

I'm going to persist in directing my emails to you personally, because you are the person responsible. I don't think it is too much to ask to have fair and reasonable questions from a ferry committee answered directly by the official responsible, rather than being sent bland anonymised responses or having queries hived off in the FOISA process.

The response below again avoids the key question. **Was the lift tower built new in 2011?**

Can you please answer this and my other questions.

Thank you

Joe



Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

From: FOI <FOI@cmassets.co.uk>
Sent: 03 July 2026 10:44
To: Joe Reade <joe@islandbakery.scot>

Cc: FOI <FOI@cmassets.co.uk>

Subject: 28/06/26 FOI - Craignure PAS DRAFT

Dear Mr Reade,

Thank you for your request.

28/06/26 FOI - Craignure PAS

In response to your questions regarding the Craignure PAS, please note the existing PAS was designed by Halcrow and constructed by George Leslie, utilising second hand tunnel/walkway sections that CMAL owned.

Your email states that your query "can only be answered by him" in reference to our Director, Ramsay Muirhead. It should be noted that none of CMAL's current staff, including Ramsay, were involved in the design, management, etc. of the Craignure PAS in 2011, and therefore no one at CMAL has first hand knowledge beyond what our records show.

...

Corporate Support Services

FOI

foi@cmassets.co.uk



**Caledonian Maritime Assets Limited, Municipal Buildings, Fore Street, Port
Glasgow, PA14 5EQ**

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From: Joe Reade < >
Sent: 23 June 2026 13:10
To: Ramsay Muirhead < >
Cc: EXT – [redacted]
Subject: FW: 28/05/26 FOI - Craignure PAS

Dear Ramsay

I've just received the attached FOI response. It seems to say that the hoist section of the PAS was constructed new in 2011. Designed by Halcrow, and built by George Leslie.

Is that correct? That seems to change the outlook from this perspective. The PAS was new in 2011, but utilising some second hand parts. That it certainly different to what I understood, which was that all parts were second-hand.

Grateful if we can hear back from you on how your assessment and plans are progressing.

Thank you

Joe



Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

From: FOI <FOI@cmassets.co.uk>
Sent: 23 June 2026 12:35

To: Joe Reade <>
Cc: FOI <FOI@cmassets.co.uk>
Subject: 28/05/26 FOI - Craignure PAS

Dear Mr Reade,

28/05/26 FOI - Craignure PAS

Thank you for your request. Please see answers below and the attached documents relating to your questions regarding the Craignure PAS.

Please provide records that detail when the PAS was first installed and from where it came.

The current PAS at Craignure was installed in May 2011 and was intended as a temporary solution to replace the previous PAS that was at end of serviceable life. The PAS was installed by a contractor working for CMAL and comprised elements of spares that CMAL owned (such as the main tunnel sections).

Please also detail who owned and was responsible for the PAS that it replaced.

CMAL owned and maintained the PAS at Craignure that was replaced in 2011, having taken over the maintenance from CalMac ferries limited in late 2009.

Some information has been withheld because it is outwith the scope of the current request or, where it constitutes personal information, this have been redacted under section 38(1)(b) of the Freedom of Information (Scotland) Act 2002 (FOISA) in conjunction with 38(2A)(a), as to disclose this information would breach one or more of the data protection principles. This is an absolute exemption and therefore there is no requirement to consider the public interest.

Your right to request a review

Under FOISA you have the right to request a review of the way in which your request has been processed. Should you wish to exercise that right, you will need to contact us within 40 working days of receipt of this email. If you remain dissatisfied on completion of the review, you have the right to appeal to the Office of the Scottish Information Commissioner (SIC) and thereafter to the Court of Session on a point of law only. The contact details for the SIC are:

Scottish Information Commissioner

Kinburn Castle

Doubledyke Road

St Andrews

Fife

KY16 9DS

Email: enquiries@foi.scot

Tel: 01334 464610

Kind regards,

Corporate Support Services

FOI

foi@cmassets.co.uk



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From: Joe Reade <joe@islandbakery.scot>
Sent: Thursday, May 28, 2026 6:21 pm
To: FOI <FOI@cmassets.co.uk>
Subject: FOI - Craignure PAS

Good morning

I have a second request under FOISA in relation to Craignure PAS.

Please provide records that detail when the PAS was first installed and from where it came.

Please also detail who owned and was responsible for the PAS that it replaced.

Thank you

Joe

Thu 02/07/2026 15:53

Dear Ramsay

I'm guessing the elevation to knighthood was a typo – unless you know more about the honours system than me?!

Firstly, can I please ask again that emails come from a named individual. I'm assuming in this case that you are the author. We don't get anonymised emails from any other government agency or department, because that tends to undermine accountability and avoids responsibility. So please can we have the courtesy of an email signature from the named individual who writes.

On the substance – you've told us a lot of things we know already, but you have not addressed any of the bullet point items in the opening email. Nor have you answered the specific question in the follow-up email. I also have not had a response addressing the disparity between what we were led to believe regarding the provenance of the PAS, and the contents of the FOI response I forwarded to you. (You told us that the PAS was "effectively cobbled together from bits that we had spare back in 2011", when in fact the key part of the PAS (the lift tower) was built new. It included second-hand parts, the critical section you have an issue with was built new.)

We appreciate the time and effort both you and Fraser took to attend our last committee meeting, and for your openness in that meeting. Our treatment since then has been very different.

If you do not intend to answer our questions, can you please clearly state that, rather than sending an email that fails to acknowledge that questions have even been asked?

Or please just answer the questions. We are the local users' representative committee. CMAL have an obligation to consult with us respectfully. Anonymised emails that avoid answering fair and relevant questions do not qualify as respectful dialogue.

I look forward to hearing from you

Joe

Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

From: operations <>

Sent: 02 July 2026 13:38

To: Joe Reade

Cc: [redacted]

Subject: Update on Craginure Passenger Access System

Dear Sir Joe Reade,

Thank you for your e-mail and your patience in this matter.

CMAL can confirm the passenger access system (PAS) at Craginure Ferry Terminal remains out of service and will not be returned to use in its current form.

The port of Craginure is owned and operated by Argyll & Bute Council, including the electrical supply to the PAS.

The ferry services running to/from Craginure are operated by CalMac Ferries Limited.

CMAL owned the previous PAS (pre-2011), which was part of the asset transfer from Caledonian MacBrayne to CMAL when it was formed in 2006. CMAL own the current Craginure PAS, which was put in place after the previous PAS reached the end of its serviceable life.

The current Craginure PAS was installed as a temporary solution for passenger access to the MV Isle of Mull at Craginure Pier in 2011. The PAS had life extension work

undertaken later that same year and has been regularly maintained by CMAL since then.

In April 2026 a defect was identified with the lifting mechanism on the PAS. Upon investigation it was revealed that the works required to bring the PAS machinery back into service would mean the parts and systems modified and parts or systems affected by the modification would need to be assessed for compliance against the latest design and safety standards. Additionally, Argyll and Bute Council have identified a fault within the earthing system of the electrical supply to the PAS which requires remedial works or isolation at source.

Following careful consideration by CMAL and our specialist advisors, with costs anticipated to be comparable to fabrication and installation of a new PAS, we have determined that it is not economically viable to carry out the required works to bring it back into service.

CMAL have been working with CFL and specialist advisors to explore options for foot passenger access to MV Isle of Mull at Craignure. The most likely solution has focussed on utilising the PAS platform in a fixed position at a level to allow access over the brow gangway within a certain tidal window. It was recognised from the outset that this would not suit all sailings, but it was felt worthwhile to explore whether a significant proportion could be accommodated. Analysis of tidal forecast data and timetabled sailings is continuing and will be considered along with operational practicality to determine the suitability of this option.

In the interim, CFL are managing passenger access to MV Isle of Mull via the car deck at an operational level at the port.

We understand the interim arrangements will have impacts for those travelling through Craignure, particularly during the busier summer period. Operations are being managed as efficiently as possible by frontline staff, while ensuring the safety of the travelling public, port staff and vessel crews in circumstances beyond their control.

For service information details, please check CalMac's Service Status.

Thank you for your continued patience and understanding, especially towards frontline staff.

Operations

From: Joe Reade

Sent: 15 June 2026 17:22

To: 'Ramsay Muirhead' <>; 'operations' <>

Cc: [redacted]

Subject: RE: Craignure PAS

Dear Ramsay

Prompted by conversations with people who have a much better professional understanding of the relevant regulations, I'd like to ask one further very important question –

Can you please detail the regulations applicable to the PAS, and which parts of those regulations are the cause for concern? In other words, exactly which parts of which regulations have led you to conclude that the correct response to the faulty winch issue is to bring the entire PAS up to current safety standards?

Thank you

Joe

Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

joe@islandbakery.scot

From: Joe Reade

Sent: 09 June 2026 12:50

To: 'Ramsay Muirhead' <Ramsay.Muirhead@cmassets.co.uk>; 'operations' <Operations@cmassets.co.uk>

Cc: [redacted]

Subject: RE: Cragnure PAS

Dear Ramsay

Thank you for taking the time to attend our committee meeting last week and for explaining the detail around the Cragnure PAS.

We are very concerned that Cragnure will be reduced to gangway operation indefinitely, and do not feel that CMAL have fully explored all the options.

To summarise what you told us for the benefit of those in copy –

The defective item is the winch that raises and lowers the final section of linking walkway that joins the PAS platform proper to the vessel. This is a relatively light and simple winch mechanism.

The main lifting mechanism for the PAS proper is in working order.

The PAS was installed in 2011, and comprises several used elements inherited from earlier PAS systems.

The main PAS hoist and upper platform is one discrete section (of which the linking walkway and winch is a part. Highlighted blue below); the covered articulating ascent/descent walkway is another (yellow in the image below), and the lower fixed covered walkway a third (red).

The linking walkway winch needs to be replaced. From CMAL's reading of the relevant regulations, it is believed that replacement (or repair?) of this winch is so significant that it will trigger a requirement for the entire PAS to be brought up to current safety standards. Such upgrade is so extensive and costly that complete renewal of the entire PAS is likely to be the outcome.

Return to 'as built' condition is not believed to be possible due to the 'mix and match' of the different PAS elements.

It is CMAL's understanding that if a replacement (or repair?) of the winch is carried out in isolation, CMAL will increase their risk in the event of any subsequent injury claim against them (because a full update of the entire PAS should have been included alongside repair of the winch).

The problem is not therefore that the PAS cannot be made safe. The problem is that repair of the PAS could give an opportunity for a claimant to make a claim (or increase the value of their claim) on technical grounds related to the apparent duty of CMAL to upgrade the entire PAS in addition to repairing the walkway winch.

The solution CMAL prefer is for the PAS to be scrapped, and replaced by a traditional gangway hoisted from the ship's davits.

I can appreciate your concerns about personal and company liability. However, as user representatives we firmly believe the focus should be on the broader safety case and the impact on services.

Although old and unsightly, the current PAS is a safer means of embarking and disembarking passengers than any traditional gangway. By replacing the PAS with a gangway, CMAL will be increasing the risk, not decreasing it.

A gangway will often be far steeper than the PAS. It will have steps, or cleats that make it difficult or impossible to traverse with buggies, rolling luggage and impossible for wheelchairs. It is likely to be narrower than the PAS, which together with the above will make passenger movement much slower.

For the infirm or with mobility issues it is likely to be unusable. Many passengers will have no option but traverse via the car deck.

It will be open to the weather, not only making it difficult to use in poor weather, but less safe.

The action of hoisting the gangway from the ships davits will not only be slower, but it introduces a new set of risks to staff that will have to be managed.

As well as the direct impact on passenger safety and convenience, use of a gangway will increase turnaround times. This will break key public transport connections that the current timetable only just manages to maintain.

Given the negative convenience, service and safety impacts of a gangway, we must insist that CMAL make more effort to find a solution that allows the current PAS to remain in operation.

- CMAL's interpretation of the relevant regulations should be checked by third parties, with the objective of finding a solution that addresses the liability issue AND maintains use of the PAS.
- Your assumption that repair of the linking walkway winch will trigger an upgrade of the entire PAS system should be tested.
 - o Would the HSE really treat the entire PAS as a single system? Or could an argument be made that the lifting platform (of which the linking walkway is a part) is one discrete unit, and it is that which you are returning to 'as built' condition?
 - o Solutions to repair or replace the walkway winch could be presented to HSE for prior approval, so that questions of regulatory compliance are addressed by the ultimate authority now, prior to any potential injury claim? Such approval could be supported by third party engineering / compliance opinion.
- CMAL should consider the wider safety case, not just the PAS in isolation. The obvious increase in passenger and staff risks that arise from the use of a gangway should included in any representations made to the HSE.
- CMAL should consider whether they might actually be increasing their personal company liability, should a subsequent personal injury claim related to the use of the gangway be made. Would an injured claimant be able to demonstrate that CMAL replaced a safe PAS system with an unsafe gangway without due cause, or without consideration of the wider safety case?

In short, the case for removing the PAS is not based on passenger safety, but on company liability. If this was truly a safety case, then clearly the safest outcome is to keep the PAS in operation.

We look forward to a full response on the above, prior to any decisions being taken.

Thank you

Joe

Mull & Iona Ferry Committee

www.mullandionaferrycommittee.org

Joe Reade, Chair.

joe@islandbakery.scot