

Consultation Submission: **Questions for Transport Scotland on the CHFS3 Direct Award to CalMac**



Key Themes and Additional Commitments Requested

We call for the following critical issues to be formally recognised and addressed within the CHFS3 contract and governance framework:

- **Unmet Demand & Lost Opportunities:**

A robust system must be put in place to measure unmet demand and lost travel opportunities—including those for islanders, young families, and commercial freight—and to use this data to guide future investment and planning.

- **Use of Islands Community Impact Assessments (ICIA):**

The contract must fully commit to transparent and meaningful use of the ICIA process, with published outcomes, to ensure services are designed around actual community need.

- **Protection of RET and Affordability:**

The Road Equivalent Tariff must not be framed as a problem or excuse to suppress demand. Price must not become a control mechanism due to lack of capacity. The recent fare increases (including the 10% rise) risk damaging affordability and must be urgently reviewed—especially for low-income islanders and under-22s.

- **Clarity and Visibility of 10-Year Plan:**

The contract must include a transparent, public 10-year delivery plan with timelines, named responsibilities, and community-informed goals, including the ability to adapt to future needs.

- **Accountability of Area Management and Communication:**

Senior leadership must remain directly accountable and engaged. Area Managers must not become a buffer to avoid scrutiny. Promised improvements in cross-network communication and post-sharing must be delivered.

1. Governance, Accountability and Oversight

- What specific mechanisms will Scottish Ministers use to monitor and enforce accountability under this new public service model?
- How will the role and authority of the Scottish Government differ in practice under this direct award, compared to the previous commercial contract model?
- What safeguards will ensure CalMac's operational decisions remain democratically accountable and responsive to regional priorities?
- What will be the governance arrangements to ensure local and regional accountability is improved in the new contract?
- Will there be a CHFS3 Ferry Service Ombudsman to provide independent oversight?
- Will the CHFS3 Management Board include ferry user group and island community representatives?
- Will local authority transport committee chairs (e.g. from the Western Isles) be part of governance boards?
- Can operational management roles be relocated to island communities for greater accountability?
- How will lifeline services be defined and safeguarded in alignment with NTS2?
- Will the contract allow flexibility in timetabling and capacity, beyond cost-neutral adjustments?
- How will accountability be shared across CalMac, CMAL, and Transport Scotland to avoid further community detachment by the tripartite group?

2. Transparency and Public Interest

- Why was a direct award chosen instead of an open competitive tender, and what independent analysis confirms this is the best public outcome?
- On what basis was the non-tendering decision made?
- What audit and scrutiny processes will apply to the Annual Business Plan and Five-Year Corporate Plan?
- Will route-by-route costs and subsidy levels be published?
- How will transparency be ensured in decision-making and resource allocation?
- Will regular public reporting cover vessel availability, disruption, and engagement?
- How will lifeline ferry services be given equal strategic value to subsidised rail or other transport?
- How will the Five-Year Plan be developed with community input from the outset, and not just after publication?

3. KPIs and Performance Monitoring

- What new KPIs are being introduced and how do they differ from CHFS2?
- Will performance be measured per route against the published core timetable?
- Will “relief events” that excuse penalties for delays/cancellations be eliminated or strictly limited?
- Will weather-related cancellations be broken down by vessel, route, and port infrastructure?
- Will the new system be required to measure unmet demand and booking failures, particularly for residents, tourists, and freight?
- Will the operator report separately on islander vs visitor demand and commercial vehicle bookings?
- Will the impact of smaller replacement vessels on perishable goods and delivery schedules be disclosed?
- Will Transport Scotland require detailed reporting on:
 - Cancelled or rescheduled bookings;
 - Knock-on effects of disruption;
 - Disruption to island supply chains and Royal Mail;
 - Vessel maintenance (planned and unplanned);
 - In-water survey use as performance indicators;
 - Island disconnection days;
 - Shore-side reinvestment from landing dues;
 - Penalty tracking per route and timeline.

4. Community Engagement and Stakeholder Input

- What formal mechanisms will exist for user groups, local authorities, and communities to influence decision-making?
- Will the Ferries Community Board and Stakeholder Groups be strengthened?
- Will Islands Community Impact Assessments (ICIAs) be published for every major operational or policy decision?
- How will Community Needs Assessments inform actual contract obligations?
- Will communities have input into how service failure penalties are structured?
- How will Area Managers be evaluated, and what real powers will they have?
- Will stakeholders have access to a defined escalation and response timeline process?
- Will communities have a formal right to challenge decisions (e.g. on capacity shortfalls)?
- How will accountability be maintained so Area Managers do not become a shield for senior decision-makers avoiding responsibility?
- When will the promised sharing of senior posts across the ferry network be implemented?

5. Accountability to Ferry Stakeholders

- How can communities, user groups, and councils hold CalMac, CMAL, and Transport Scotland to account under CHFS3?
- Will there be an independent ombudsman to mediate complaints and decisions?
- Will stakeholder feedback be collected, acted upon, and publicly reported annually?
- How will the new system move beyond token engagement to genuine co-design?
 - Will stakeholders have input on:
 - Vessel deployment;
 - Crew configurations;
 - Booking system rules?

6. Operational Improvements and Service Delivery

- What vessel and crew changes are being introduced to improve reliability and resilience?
- Will crewing decisions be open to community review and scrutiny?
- Will CHFS3 allow for:
 - Additional sailings in response to demand?
 - Night sailings or increased service in peak seasons?
 - Catch-up services after major disruption?
- Will there be pre-agreed contingency timetables?
- How will bus, ferry, and coach timetables be better integrated (e.g. for Mull/Iona)?
- Will communication during disruptions improve, with transparent criteria for decisions?

7. Connectivity and Multimodal Integration

- How will CHFS3 reduce car dependency, particularly for tourists?
- Will onward travel options be clearly displayed and bookable with ferry tickets?
- Will there be active collaboration with bus/coach providers to:
 - Coordinate schedules;
 - Enable joint ticketing;
 - Improve access for foot passengers?
- Will CHFS3 include guaranteed support for stranded foot passengers (e.g. transport/accommodation)?

8. Financial Efficiency and Investment

- Will cost per route and subsidy allocations be fully published?
- How will value for money and fair competition be ensured?
- Who will decide capital investment priorities?
- Will the operator contribute to cost savings, or is affordability being subsidised only by passengers and government?
- Will under-22 pricing equality be delivered, particularly given recent fare rises?
- Why is the Freight Fares Review delayed, and can this be accelerated?

9. Long-Term Strategic Planning and Review

- How will the Five-Year Corporate Plan be co-designed with communities from the start?
- Will a mid-term independent review or break clause be included?
- How will CHFS3 align with:
 - The Islands Connectivity Plan;
 - Decarbonisation and economic goals;
 - Commitments to dual vessels on Little Minch and a relief vessel for the Outer Hebrides?
- How will the contract address persistent issues in the booking system, including:
 - Failure to record unmet demand;
 - Lack of resident/visitor distinction;
 - Call centre wait time and missed call data?
- Will CHFS3 explore decentralised or community-led models of delivery in the medium term?
- How will Transport Scotland publish and report on subsidy effectiveness, as per statutory guidance?
- Why has the Freight Fares Review been consigned to the long term, and what are the consequences for fragile island economies?

