

## Briefing Note Template

**Elected Member Briefing – Northern Isles Ferry Services Contract 4 (NIFS4)  
Consultation – SIC/ZetTrans Response**

**Elected Member Briefing Note Ref. No. 2025-11**

### **About this Briefing Note**

Briefing by: *Michael Craigie - Executive Manager Transport Planning/ Lead Officer ZetTrans*

Date: 28 October 2025

Subject: ***Northern Isles Ferry Services Consultation – SIC/ZetTrans Response***

**Public / Exempt / Confidential**

*if exempt or confidential explain risks and consequences.*

### **Purpose**

This briefing note is to provide Members with a copy of the SIC/ZetTrans response to the consultation on the Northern Isles Ferry Services Contract 4 (NIFS4).

### **Background**

*Transport Scotland launched its public consultation for the next Northern Isles Ferry Services Contract 4 (NIFS4) on 17 July 2025.*

*The attached response was submitted on 13 October 2025. The closing date for the consultation was 20 October 2025.*

### **Key points**

- The Northern Isles service is a lifeline, central to Shetland’s connectivity and wellbeing.
- Freight is integral to the islands’ economy, supporting exports, food supply, and community resilience.
- Reliability, affordability, and fair access to accommodation remain essential to confidence in the service.
- Engagement between Transport Scotland, the operator, and ZetTrans should be strengthened, with clearer feedback loops and transparent decision-making.

- The next contract should embed fairness across passengers, freight and concessionary travel as well ensure adequate capacity is at the core of service provision, supported by clear contractual expectations.

## **Overview**

*Detail is given in the attached consultation response*

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Last modified on: 28 October 2025

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**Please return this form to [memberssupport@shetland.gov.uk](mailto:memberssupport@shetland.gov.uk) to be logged and circulated to all Councillors.**

END

# Public Consultation for the next Northern Isles Ferry Services Contract 4 (NIFS4)

## Capacity and demand

During 2025 and 2026 we will be carrying a Community Needs Assessment. This project will provide evidence and ferry service options for the future Northern Isles Ferry Services (NIFS4) contract, as well as for planned capital investments in vessels and port.

Q1a. Overnight accommodation on ferry services consists of different types of options. If you have used overnight accommodation on a service, please provide your views on overnight cabins.

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q1b. Overnight accommodation on ferry services consists of different types of options. If you have used overnight accommodation on a service, please provide your views on overnight pods.

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q1c. Overnight accommodation on ferry services consists of different types of options. If you have used overnight accommodation on a service, please provide your views on overnight reclining or standard seats.

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q2. On occasion, vessels showing as fully booked sail with empty spaces because some booked cars, lorries and/or cabin users do not show or fail to cancel. We are considering implementing a late cancellation fee for pre-booked tickets, in order to incentivise customers to cancel bookings with reasonable notice so that spaces can be made available to others.

Do you agree with this idea?

Yes

No

No opinion

Please explain your answer

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Unplanned and essential travel

We understand that on NIFS most journeys are booked in advance but that sometimes pre-booking a ticket isn't an option, and that last minute booking might be required.

Q3. What do you think the operator could do to further support those who need to travel urgently?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Fares

Currently there are seasonal and islander fares (a discount of 30% year round), however we understand that travel on Northern Isles Ferry Services can be expensive for some, and we are interested to hear views on future fares policy.

Q4. Would you like to see the introduction of Road Equivalent Tariff (RET) fares for islanders on the Northern Isles Ferry Services routes, with fares changed to be directly proportional to distance?

Yes

No

Please explain your answer

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q5. The recently published Islands Connectivity Plan Strategic Approach said that we will consider changes to how the RET formula will be applied on longer routes, for example Aberdeen – Kirkwall - Lerwick. This could include reducing the mileage rate or capping at the current mid season fare.

Do you have comments on these options or further suggestions?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q6. Would you like to see more dynamic pricing for visitors, aimed at managing demand and supporting RET for islanders?

Yes  
No

Please explain your answer

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Community voice, transparency and accountability

We would like to ensure that there is meaningful engagement with the community on the operation of NIFS services.

Q7. Would you like to see any changes in how the NIFS operator communicates with you, for example in relation to service changes or cancellations?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q8. The NIFS Operator and Transport Scotland regularly engage with the Orkney External Transport Forum and Shetland External Transport Forum.

Do you think these transport forums reflect community views effectively?

Yes

No

If no, please explain your answer?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Understanding connectivity needs and integration

Looking at how integration with onward and connecting travel can be promoted will enable us to provide opportunities for better connectivity and ferry user access via active travel, public transport, and other more sustainable transport modes.

Q9a. How satisfied are you with the public transport (bus/rail) to or from the NIFS terminals?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q9b. How satisfied are you with the active travel infrastructure (walking, wheeling and cycling) to or from the NIFS terminals?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

10a. What do you think could be done by the NIFS ferry operator to support integration with public transport (bus/rail)?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

10b. What do you think could be done by the NIFS ferry operator to support integration with active travel infrastructure (walking, wheeling and cycling)?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Accessibility, Environment and low carbon

Community feedback suggests that some equality groups face additional challenges when traveling on NIFS. Equality groups include those who have protected characteristics under the Equality Act 2010; age, gender reassignment, married or in a civil partnership, pregnant or maternity, disability, race (including colour, nationality, ethnic or national origin), religion or belief, sex or sexual orientation.

Q11. How do you think services could be improved in the next NIFS contract to help with accessibility throughout the ferry journey?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Recent feedback on how we can work towards reducing emissions has been helpful.

Q12. Do you have any other suggestions on how NIFS can reduce their overall environmental impact against the following environmental factors identified in the Environmental Assessment (Scotland) Act 2005 including: air quality, population and human health, noise, material assets, water environment, biodiversity, and cultural heritage?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Freight

Q13. Are there ways to improve how the Northern Isles Ferry Services contract operator works with hauliers and businesses to more effectively plan commercial traffic volumes?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q14. Noting the procurement to introduce replacement freight flex vessels into the NIFS fleet in future, do you have any suggestions to better manage or reduce the demand on routes which experience high freight volumes in the interim or longer term?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q15. Do you have any additional comments or recommendations regarding how to improve ferry freight services?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q16. How could the current charging processes on freight for NIFS services be enhanced or changed in the future?

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## General

Feedback provided by the community has highlighted that freight bookings can impact available vehicle spaces on vessels.

Q17. Looking at the list below, what would you consider to be the top 3 priorities for the next NIFS contract?

Reliability

Punctuality

Quality of on-board accommodation

Quality of on-board catering

Ease of booking a ticket

Ease of changing a booking

Customer service by staff on board

Customer service by staff in ferry terminals

Signage at and enroute to ferry terminals

Other (please add)

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

Q18. Do you have any other suggestions on how the NIFS services could be improved?

Yes

No

Please explain your answer

See accompanying ZetTrans response in document titled [251013 ZetTrans\\_NIFS4\\_Consultation\\_Response - Final For Submission.docx](#)

## Respondent information form

**Please Note** this form **must** be completed and returned with your response.

To find out how we handle your personal data, please see our [Privacy Policy](#)

Are you responding as an individual or an organisation?

- Individual
- Organisation

Full name or organisation's name

ZetTrans

Phone number

01595 744868

Address

8 North Ness Business Park. Lerwick, Shetland

Postcode

ZE1 0LZ

Email

zettrans@shetland.gov.uk

**Transport Scotland**

Are you responding as a:

- NIFS network resident – Orkney
- NIFS network resident – Shetland
- NIFS network user – Scottish Mainland
- NIFS network business – Orkney
- NIFS network business – Shetland
- NIFS network visitor or tourist
- Other (i.e. responding on behalf of a group)

If you selected business, please indicate in the box below which type of business you represent (i.e. haulier, livestock, fisheries, energy, hospitality etc)

If you selected other, please give details in the box provided below:

Regional Transport Partnership

What route in the NIFS network do you use most frequently?

- Aberdeen to Lerwick
- Aberdeen to Kirkwall
- Kirkwall to Lerwick
- Scrabster to Stromness

Why do you mainly use NIFS network services?

- For Business
- For Work/Education
- For Personal/Leisure
- For freight
- All of the above
- Other – Consultation response in context of Regional Transport Partnership

How frequently do you use NIFS services?

- 5-7 times a week
- 2-4 times a week
- Once a week
- Once every other week
- Once a month
- Occasionally
- Seasonal (Summer Period)
- Other – Consultation response in context of Regional Transport Partnership

Are you:

Under 16

16 to 18

19 to 21

22 to 34

35 to 44

45 to 54

55 to 64

65 to 74

75 or over

Other – Consultation response in context of Regional Transport Partnership

Do you consider yourself to have a disability? – N/A

Yes

No

**Transport Scotland**

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

- Publish response with name
- Publish response only (without name)
- Do not publish response

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

- Yes
- No

**Information for organisations:**

The option 'Publish response only (without name)' is available for individual respondents only. If this option is selected, the organisation name will still be published.

# ZetTrans Draft Responses to Transport Scotland Consultation on the Next Northern Isles Ferry Services (NIFS) Contract

## Introduction

ZetTrans, Shetland's Regional Transport Partnership, welcomes the opportunity to respond to Transport Scotland's Public Consultation for the next Northern Isles Ferry Services Contract (NIFS4). The Northern Isles Ferry Services are Shetland's critical lifeline connection, sustaining the economy, supporting communities, and enabling essential access for residents, businesses, and visitors. This response is rooted in Shetland's lived experience and informed by professional expertise in transport planning. ZetTrans is committed to working with Transport Scotland, the ferry operator, and industry stakeholders to ensure that NIFS4 delivers a reliable, fair, and sustainable service that meets Shetland's unique needs.

## Executive Summary

The Northern Isles Ferry Services are central to Shetland's lifeline connectivity. This response highlights five cross-cutting priorities that must underpin the next contract:

1. **Adequate freight and passenger capacity** in the short, medium and long term.
2. **Equity and Affordability** – Shetland faces the highest fares in Scotland and an unavoidable overnight journey requiring costly accommodation. Affordability and fairness must be treated as lifeline priorities.
3. **Accessibility and Inclusion** – Services must be inclusive for all, embedding accessibility from booking through to boarding and onboard experiences.
4. **Freight as a Lifeline** – Freight is as critical as passenger services. Collaborative engagement with industry must be safeguarded, and freight flex vessels integrated carefully to balance freight and passenger needs.
5. **Environment and Resilience** – The operator must reduce environmental impact within its control while supporting long-term transition to sustainable vessels and infrastructure.

ZetTrans' overarching priority is adequate passenger, non-commercial vehicle and freight capacity. Added to that the top three priorities for NIFS4 are: 1) Reliability, 2) Affordability and equity of access (including overnight accommodation costs), and 3) Fair access to accommodation.

# Individual Question Responses

## Q1a. Views on Overnight Cabins

*Overnight cabins are not a luxury on the Northern Isles routes but an essential lifeline service. On a 12–14 hour crossing they provide rest, privacy, and dignity, enabling passengers to arrive fit for onward travel. This is particularly important for those who must drive long distances on the mainland, where road safety campaigns consistently warn against driving while fatigued.*

*The issues around cabins are often presented as a matter of competing priorities between residents, tour operators, and visitors. In practice, this is not accurate. The real problem is the lack of capacity at peak times (both at pinch points in the week and during seasonal peaks). Tour operator and group allocations account for only a small proportion of overall demand, and many of these allocations are for local schools and sports clubs as well as visiting groups. The perception of unfairness arises because tour operators and groups typically book well in advance, while many (but not all) residents, by necessity, tend to book much later — often around six weeks before travel — by which time cabins and/or vehicle deck capacity are often sold out.*

*ZetTrans believes the next contract must address cabins as essential core capacity, managed in a way that is transparent, balanced, and fair to all users. We recommend that:*

- Booking windows are extended (12+ months) to give both residents and operators confidence to plan ahead.*
- Group allocations continue to be capped and monitored, with unused allocations promptly returned to general booking.*
- Healthcare travel continues to benefit from reserved capacity, with the current small NHS quota supplemented by a minimal safeguard (for example, holding one accessible cabin per sailing for emergencies until close to departure).*
- Transparency is improved through a clear, sequential waiting list system so that cancelled cabins are allocated fairly to those already queued, not re-released at random. Regular publication of allocation data would further strengthen confidence.*

*ZetTrans also wishes to highlight an issue with the current over-60s concession scheme. This provides eligible passengers with four free single journeys per year inclusive of a cabin. However, when a single traveller seeks sole use of a two-berth cabin, the current operator requires either the surrender of two vouchers for a single journey or an additional payment for the unused berth. Over 60s pairs or groups do not face this barrier, as they can use both berths within their allocation. This practice reduces the value of the concession for single older travellers compared to those travelling as a pair or group.*

*More broadly, there is also a disparity between Shetland's concession scheme and that of other ferry networks. On most, if not all, other NIFS and CHIFS routes, the over-60s concession provides a full four free travel opportunities. The current approach on the Shetland route,*

*while recognising the unique need for cabins, is applied in a way that disadvantages single older travellers relative both to pairs/groups and to older passengers elsewhere in Scotland.*

*ZetTrans considers this inequitable. If the principle of the concession is to provide equal benefit to all eligible passengers, then it should apply consistently regardless of whether a traveller is alone or with others. We would therefore encourage Transport Scotland to ensure that the NIFS4 contract explicitly prevents any requirement for single older travellers to surrender additional vouchers or pay for unused berths. This would guarantee that the concession provides equal benefit to all over-60s, regardless of whether they travel alone or with others.*

*The fundamental solution, however, is to increase peak-season capacity. Without this, all groups — residents, visitors, community organisations, and businesses — will continue to feel that they are being forced into competition for limited space. The next contract should therefore embed cabins as essential lifeline provision, with allocation managed in a way that protects fairness, safety, and community confidence.*

### **Q1b. Views on Overnight Pods**

*Overnight pods provide an alternative to cabins and standard seating, and for some passengers they represent a useful mid-range option — particularly younger travellers, students, and solo passengers seeking an affordable rest space. Feedback shows, however, that pods are not universally welcomed, and views within the community are mixed.*

*Some passengers find pods uncomfortable for long overnight sailings, and they can exacerbate seasickness. There are also concerns about safety and dignity, especially for women and vulnerable travellers using shared spaces. While operators highlight that lounges are monitored, passenger experience suggests that visible staff presence and better design are needed to provide reassurance.*

*ZetTrans welcomes the operator's current research into lie-flat pods, which respond to long-standing community calls for a more practical and dignified rest option short of a cabin. These developments are not yet confirmed and remain at the trial stage, but they should be taken forward into future provision if they prove workable.*

*The next contract should therefore require the operator to:*

- Provide pods as an affordable alternative, but not as a substitute for adequate cabin provision.*
- Ensure pod and recliner lounges are designed and managed with safety, dignity, and security in mind, including staff presence, lighting, and clear rules of use.*
- Continue research and, if viable, implement lie-flat pod options to improve comfort and safety for overnight passengers.*

*In summary, pods can play a part in the overall mix of overnight accommodation, but they must be delivered in a way that upholds passenger safety and dignity and complements — rather than replaces — the core requirement for sufficient cabin capacity.*

### **Q1c. Views on Reclining/Standard Seats**

*Standard and reclining seats remain the lowest-cost option for overnight travel and are important for affordability, group travel, and when cabins or pods are unavailable. However, feedback from communities and passengers indicates that current provision is often inadequate for journeys of 12–14 hours. Travellers frequently arrive fatigued, which undermines safety, wellbeing, and the purpose of a lifeline service.*

*Key issues identified include:*

- *Limited recline and lack of leg support, making it difficult to rest.*
- *Inconsistent provision of blankets and inadequate heating, with some lounges reported as uncomfortably cold overnight.*
- *Noise and lighting that make it difficult to sleep or even rest.*
- *Lack of clear zoning, with families, general travellers, and those seeking quiet rest all sharing the same areas.*

*ZetTrans considers that seating must be upgraded to meet minimum overnight standards. The next contract should require the operator to:*

- *Provide seats with true reclining function, leg/foot support, and access to charging points.*
- *Ensure blankets and adequate heating are available throughout, alongside good ventilation.*
- *Create designated zones (quiet, family, general) to reduce conflict and disruption.*
- *Ensure accessible seating is located close to toilets and facilities designed for passengers with reduced mobility.*

*Seated accommodation should remain affordable, but it must no longer be synonymous with discomfort or fatigue. For many users, seats are their only viable option; they should therefore be specified and delivered to a standard that reflects the overnight, lifeline nature of the service.*

### **Q2. Late Cancellation Fee**

*ZetTrans recognises that late cancellations and “no-shows” can lead to cabins, seats, and vehicle spaces sailing empty while other passengers are unable to book. This creates frustration and reduces the effective capacity of the service. Addressing this problem could improve fairness and help meet urgent travel needs.*

*However, any system of late cancellation fees must be carefully designed. The service is a lifeline, and passengers often face circumstances outside their control — from flight disruption to sudden changes in medical appointments. A blunt fee structure could unfairly penalise residents who already face high travel costs and limited alternatives.*

*ZetTrans therefore believes that:*

- Any fee should apply only to very late cancellations (e.g. within 24 hours of departure), where there is little or no opportunity to reallocate space.*
- Medical, compassionate, and weather-related travel must be explicitly exempt.*
- Cancellations must be easy to make at any time via online, phone, or app channels, to encourage timely release of space.*
- Cancelled capacity must be reallocated through a transparent, sequential waiting list system, ensuring fairness and trust.*
- Data on cancellations, reallocations, and recovered capacity should be regularly published to demonstrate impact and maintain confidence.*

In summary, ZetTrans supports the principle of discouraging “phantom bookings” but only through a narrowly targeted, fair, and transparent system. The focus should be on maximising effective capacity, not penalising lifeline users.

We understand that on NIFS most journeys are booked in advance but that sometimes pre-booking a ticket isn’t an option, and that last minute booking might be required.

### **Q3. Supporting Urgent Travel**

*Island residents sometimes face urgent and unavoidable travel needs, such as short-notice healthcare appointments, family emergencies, or weather-related disruption. These situations are stressful, particularly when cabins or car spaces are required and services appear fully booked. The current arrangements, including a small NHS cabin allocation, provide some protection but do not always meet wider urgent needs.*

*ZetTrans believes the next contract must include clearer and more transparent safeguards for urgent travel. In particular:*

- Transparent waiting list: Where services are fully booked, passengers should be able to register on a waiting list and be allocated cabins or vehicle spaces in strict order as they become available. Re-releasing space to the open booking system without regard to those waiting undermines fairness.*

- *Minimal emergency provision: A small safeguard — for example, one accessible cabin per sailing held until departure if all others are booked — could provide critical flexibility for last-minute essential needs.*
- *Defined categories: Clear criteria should be published for what constitutes urgent or essential travel (e.g. definition of compassionate circumstances).*
- *Dedicated booking support: A staffed helpline or online function should ensure urgent cases are assessed fairly and consistently, rather than leaving passengers to compete with others refreshing the booking website.*
- *Transparency and reporting: Regular publication of data on urgent allocations and waiting list outcomes would provide accountability and public confidence.*

*The aim should be to protect lifeline needs without undermining general availability or deterring forward planning. Urgent travel is a reality of island life, and the contract must acknowledge and provide for it explicitly.*

#### Q4. Road Equivalent Tariff (RET) for islanders on NIFS routes

*ZetTrans supports, in principle, the extension of Road Equivalent Tariff (RET) to the Northern Isles routes. RET has been applied elsewhere in Scotland and is viewed by island communities as a fairer basis for setting fares, directly linked to distance rather than operator pricing.*

*However, the Aberdeen–Kirkwall–Lerwick routes are substantially longer and more costly to operate than other RET routes. A straightforward application of the current RET formula would have unintended consequences — lowering some visitor passenger fares, but significantly increasing islander car fares compared to today’s discounted levels.*

*In addition, unlike shorter routes covered by RET, overnight accommodation is essential on the Northern Isles services. Cabin costs therefore represent an integral part of the fare burden, not an optional extra. Unless cabin pricing is addressed alongside passenger and vehicle fares, islanders will continue to face a “double barrier” of distance and mandatory accommodation costs when accessing the mainland.*

*ZetTrans’ position is therefore that RET should apply to the Northern Isles, but only if it is adapted to reflect both the scale of the routes and the essential role of cabins, ensuring no resident faces higher costs than at present.*

#### Q5. RET adaptations for long routes

*As noted in Q4, applying the standard RET formula directly to the Aberdeen–Kirkwall–Lerwick routes would not deliver fair outcomes. Specific adaptations are needed to make RET workable and equitable. ZetTrans recommends that Transport Scotland explore:*

- *Reducing the mileage rate applied to long routes, recognising the unique costs of extended sailings.*

- *Capping fares at current mid-season levels or even low-season levels, ensuring islanders do not face higher costs than today.*
- *Protecting islander discounts, so that resident fares remain affordable and clearly distinct from visitor fares.*
- *Addressing cabin fares directly: capping cabin prices at mid-season or low season levels, retaining the existing resident cabin discount, and exploring further relief where overnight accommodation is unavoidable.*
- *Considering hybrid models, such as applying RET to passenger fares while capping or adapting vehicle and cabin charges, to avoid sharp increases in essential lifeline costs.*

*With the right adaptations, RET could reduce travel costs, strengthen fairness with other islands, and support both residents and the visitor economy. Without such adjustments, however, RET would risk entrenching inequity by ignoring the essential overnight accommodation costs that are unique to the Northern Isles.*

#### **Q6. Dynamic Pricing for Visitors**

*ZetTrans recognises that Transport Scotland is exploring whether dynamic pricing could help manage demand and support the affordability of lifeline fares for islanders. While there may be theoretical benefits, community and industry feedback highlights significant risks.*

*Risks and concerns include:*

- *Visitor perception: Shetland is already one of the most expensive destinations in Scotland to reach. Introducing variable or higher peak fares would reinforce this image, potentially deterring families and younger travellers.*
- *Tourism economy: A growing £50m visitor sector depends on price stability and confidence. Tour operators in particular need to set package prices 12–18 months in advance. Unpredictable fare fluctuations would undermine their ability to market Shetland effectively.*
- *Equity: Dynamic pricing could create divisions between residents and visitors, or between those who can afford to book early and those who cannot, potentially restricting the ability of lower income households to access this lifeline service. This risks reputational damage to both the service and Shetland’s wider economy.*

*ZetTrans’ position is therefore:*

- *The preferred solution is to reform RET for the Northern Isles in a way that lowers and stabilises costs for residents and makes travel more affordable for visitors, particularly in shoulder seasons.*

- *Dynamic pricing should only be considered as a last resort, and only if it can be proven to deliver clear equity benefits without harming Shetland's reputation or tourism economy.*
- *If any form of dynamic pricing is pursued, it must be transparent, predictable, and capped, with safeguards for residents and price certainty for tour operators.*

*The fundamental priority remains addressing peak-season capacity and reducing overall travel costs, not introducing pricing models that set residents and visitors against each other.*

## Q7. Communication of Service Changes

*Clear, timely, and accessible communication is essential on lifeline services, where disruption or change can have serious consequences for residents, businesses, and visitors alike. Current arrangements are functional but felt by some to be inconsistent. Feedback from communities highlights frustration where service changes or cancellations are notified late, through limited channels, or without clear explanation.*

*ZetTrans believes that the next contract should require the operator to adopt best-practice standards in communication, including:*

- *Timeliness: All service changes, cancellations, and disruption information should be issued as early as possible, minimising uncertainty for passengers making onward connections.*
- *Multiple channels: Updates must be available simultaneously across text/email alerts, app notifications, website, social media, and terminal displays, so that no group of passengers is disadvantaged.*
- *Clarity and transparency: Communications should explain the reason for disruption (e.g. weather, technical fault) in plain language, and provide realistic information about the likely duration or alternative arrangements.*
- *Consistency: Ensure information provided by customer service staff, terminal teams, and online platforms is aligned and up to date.*
- *Accessibility: Communications should be compliant with accessibility standards, ensuring that passengers with disabilities or limited digital access are not excluded.*

*The operator's role is not only to run the vessels but to maintain passenger confidence and trust. High-quality communication should therefore be treated as a core service obligation, not an optional courtesy.*

## Q8. External Transport Forums

ZetTrans recognises the value of the Shetland External Transport Forum (SETF) and the Orkney External Transport Forum (OETF) as established platforms for dialogue between communities, stakeholders, the operator, and Transport Scotland. These public forums are essential in providing visibility, accountability, and inclusion. They allow communities,

sectors, and interest groups to contribute openly, and they provide a channel through which feedback can be seen and understood by all.

At the same time, the forums are not the only source of engagement. Specialist groups, such as the Stewart Building Group, provide important sector-specific perspectives — particularly on freight, seafood, aquaculture, and logistics. ZetTrans values these voices, and the challenge is maintaining the value of such inputs by ensuring that all perspectives — from industry to community — are connected into a coherent overall picture. Their contributions should complement other voices and be part of the wider strategic conversation.

A further dimension is the working relationship between ZetTrans, the operator, and Transport Scotland. Regular engagement between these partners, outside the quarterly forum setting, helps to interpret stakeholder views, consider operational and policy constraints, and build the shared understanding needed to act on the feedback given through the public forums. This ongoing collaboration is important to ensure that what is raised publicly is not just heard, but is constructively addressed within the realities of service delivery and long-term planning.

For this to work well, the next contract should:

- Strengthen the External Transport Forums by requiring the operator to work with ZetTrans to ensure the forums are representative, effective, transparent, and visibly influential, with clear evidence of how community and stakeholder input shapes decision-making.
- Ensure specialist groups (such as the Stewart Building Group) have routes for their insights to be reflected at the strategic level, so their contributions complement other voices.
- Embed structured feedback loops, where the operator and Transport Scotland demonstrate how they have responded to issues raised through the forums.

In summary, the forums must remain the cornerstone of public engagement, ensuring inclusion and transparency. Alongside this, the strong working relationship between ZetTrans, the operator, and Transport Scotland is vital to turn diverse stakeholder input into a coherent strategy for Shetland's lifeline ferry services.

### Q9a. Public Transport Satisfaction

*Public transport connections to NIFS terminals are generally good.*

- *The proximity of Aberdeen rail and bus stations provide good access for incoming and onward connections.*
- *The connection from the ferry terminal to the airport provides good access to incoming and onward air travel.*
- *In Shetland connectivity is generally good but greater clarity on the public's understanding of how to make connections could be improved.*

### Q9b. Active Travel Infrastructure Satisfaction

*Active travel infrastructure is generally adequate but could be improved in terms of connections from Aberdeen ferry terminal to the bus/rail station particularly for those with greater mobility requirements.*

### Q10a. Operator's Role in Public Transport Integration

ZetTrans recommends that the next contract includes clear requirements for the operator to act as an integrator of information and facilitator of coordination. Specifically:

- Develop integrated ticketing and journey planning solutions with national partners, so passengers can book combined ferry–rail or ferry–bus trips more easily.
- Maintain proactive liaison with ScotRail, bus operators, and transport authorities to review timetables, highlight conflicts, and seek solutions.
- Provide real-time updates to onward operators during delays or disruption, helping passengers make alternative arrangements.
- Ensure staff are trained and empowered to provide up-to-date advice to passengers at terminals and onboard about onward connections.

### Q10b. Operator's Role in Integration with Active Travel Infrastructure

Within its scope, the operator can play a strong enabling role for active travel and wheeling. ZetTrans recommends the next contract require the operator to:

- Provide secure and accessible storage for bicycles and mobility devices.
- Ensure embarkation and disembarkation processes are designed inclusively, with safe and convenient practices for wheeling and cycling passengers.
- Produce and maintain high-quality, accessible information on active travel routes at each terminal, available online and at point of travel.
- Advocate improvements with local authorities, harbour authorities and Transport Scotland, ensuring that walking, wheeling, and cycling infrastructure is embedded in wider active travel, port and terminal upgrades.

### Q11. Accessibility

*ZetTrans believes accessibility must be embedded throughout the next NIFS contract, covering all stages of the passenger journey with required compliance with the Equality Act 2010.*

#### 1. Booking and Information

- *Ensure websites, apps, and printed materials are fully accessible (screen-reader compatibility, plain language, multiple languages, large-print formats).*

- *Ensure clarity around the availability and booking of accessible cabins, seating, and assistance options.*
- *Provide real-time updates in multiple formats (SMS, email, telephone, visual/audio at terminals).*

## *2. Terminals and Embarkation (partnership with harbour authorities)*

- *Work collaboratively with Lerwick Port Authority, Orkney Harbours, and Aberdeen Harbour Board to ensure continuous step-free access, accessible waiting areas, and suitable toilets/changing facilities.*
- *Ensure boarding and disembarkation processes are safe, dignified, and do not disadvantage cyclists and passengers with mobility aids, prams, or luggage.*

## *3. Onboard Provision (within operator remit)*

- *Work with Transport Scotland and CMAL to ensure future vessels are designed inclusively from the outset.*
- *Within the contract, use available flexibility to make modest modifications and retrofits to improve accessibility (e.g. adapted seating, lie-flat pod trials, signage).*
- *Prioritise allocation of existing space to improve accessibility: reserving adapted cabins for those who need them, maintaining clear circulation routes, and ensuring step-free access wherever possible.*
- *Maintain and improve onboard information systems (visual and audio announcements, hearing loops, tactile signage) as part of operator responsibilities.*
- *Collect passenger feedback and feed evidence back to CMAL and SG to shape vessel procurement so accessibility lessons are embedded in newbuilds.*

## *4. Staff Training and Culture*

- *Embed mandatory training for all crew and shore staff in disability awareness, inclusive customer service, and assistance provision.*
- *Encourage a proactive approach, where staff offer help rather than waiting to be asked.*

## *5. Wider Accessibility and Inclusion*

- *Ensure policies account for hidden disabilities, neurodiverse passengers, and those travelling with carers or infants.*
- *Create a structured feedback mechanism, involving equality groups, to drive continuous improvement across the contract.*

## *Summary*

*Accessibility in the next contract must be seen as a core service obligation. The operator has a duty to deliver accessible booking systems, information, onboard service, and staff culture; to*

*make reasonable modifications to vessels within the contract; and to work in partnership with local authorities, harbour authorities and CMAL to deliver inclusive travel. Every passenger should be able to book, board, travel, and disembark with dignity and confidence.*

## **Q12. Environmental Impact**

*ZetTrans recognises that ferry operations have significant environmental impacts and supports efforts to reduce these in line with the Environmental Assessment (Scotland) Act 2005. Responsibility is shared: vessel design and propulsion lies with Scottish Government and CMAL, port infrastructure with harbour authorities, and day-to-day operational practice with the contracted operator.*

*Within the operator's remit (contractual responsibilities):*

- Operational efficiency: adopt fuel-efficient operating practices (e.g. slow steaming where appropriate, optimised routing, regular hull/propeller maintenance).*
- Port behaviour: minimise emissions and noise while berthed, including use of shore power where available and responsible engine management otherwise.*
- Onboard waste management: reduce single-use plastics, expand recycling and composting, and promote sustainable supply chains for catering and consumables.*
- Noise and light management: implement quiet operating procedures in sensitive areas, reduce unnecessary lighting at night, and monitor impacts on neighbouring communities.*
- Environmental culture and reporting: train staff in best practice, monitor environmental performance, and publish transparent reports to support accountability.*

*Scottish Government / CMAL responsibilities (operator liaison):*

- Procurement of vessels designed to meet future climate and air quality standards.*
- Decisions on propulsion technologies (e.g. LNG, hydrogen, hybrid, methanol) and long-term decarbonisation pathways.*
- Ensuring new vessels are compliant with climate targets and biodiversity considerations.*

*Harbour authority responsibilities (operator liaison):*

- Provision of shore power and supporting grid capacity.*
- Waste reception and recycling facilities at terminals.*
- Port estate design to mitigate impacts on air quality, noise, water environment, and biodiversity.*

### Q13. Commercial Traffic Volumes

*Freight carried on NIFS is a lifeline for Shetland's economy, from seafood exports to food, fuel, and retail supplies. ZetTrans does not speak for industry or individual exporters, but strongly emphasises that their perspectives must be central to Transport Scotland's considerations in designing the next contract.*

*Since NIFS2, Serco NorthLink has established a strong reputation for constructive engagement with hauliers, exporters, and importers. This has been widely recognised as a step change compared with previous contracts, and it has delivered real benefits in terms of communication, reliability, and trust. It is vital that this approach is protected and built upon in any future contract.*

*Looking ahead, the key requirement is for the operator to continue to work in close partnership with industries to:*

- *Share forecasts and trends in freight demand (e.g. seasonal surges in seafood, livestock shipping, major construction/ infrastructure projects).*
- *Maintain transparent systems for how deck space is allocated and reallocated when bookings change.*
- *Use data to ensure capacity is used efficiently and reliably.*
- *Provide clear and timely channels for hauliers to raise issues and receive responses.*

*These are not new requirements, but rather a call to safeguard and strengthen the collaborative practices already embedded in practice by the operator the current contract. ZetTrans values the strong relationships that exist between the current operator and Shetland's freight industries and recommends that the next contract ensures such practices remain a core expectation of service delivery.*

#### *Summary*

*The freight perspective must be heard directly by Transport Scotland. ZetTrans highlights the importance of continuity in the operator's strong engagement with industry, with scope for further enhancement in forecasting, transparency, and capacity management to ensure Shetland's exporters and importers remain competitive.*

### Q14. Freight Flex Vessels

*Freight carried on NIFS is essential to Shetland's economy and daily life. ZetTrans recognises that the current operator has developed strong and trusted relationships with hauliers, exporters, and importers, and has worked constructively to manage demand pressures under the present fleet. The introduction of freight flex vessels, with capacity for both freight and up to 200 passengers, represents a significant opportunity to build on this strong foundation.*

#### *Interim period (before 2029)*

*Until the new vessels enter service, demand for deck space will continue to exceed supply at times. ZetTrans encourages Transport Scotland to ensure the next contract allows the*

*operator to continue the good practice already established, while supporting further development in:*

- *Working closely with industries to anticipate seasonal surges to ensure sufficient capacity is available (seafood, livestock shipping, major construction, tourism).*
- *Maintaining transparent systems for how freight deck space is allocated and reallocated.*
- *Using data to ensure capacity is deployed as efficiently as possible.*
- *Keeping clear and timely channels open for hauliers to raise issues.*

*Longer term (post-2029)*

*The new freight flex vessels will be a step change. Their dual capability offers opportunities to:*

- *Relieve pressure on the ropax vessels during periods of high freight demand.*
- *Provide seasonal flexibility — to help increase capacity to meet demand, whether it be from freight, resident travel or from visitors/ tourists, during peak points.*
- *Strengthen resilience during refits and disruption.*

*It will be vital, however, that the “flex” is managed transparently and fairly, so that freight and passenger needs are given equal weight. For Shetland, the movement of goods — from seafood exports to daily food and fuel supplies — is as much a lifeline as passenger travel. Businesses and industries must have confidence that their needs will remain central in how the new vessels are deployed.*

*Summary*

*The current operator has shown the value of collaborative engagement with the freight sector. The next contract should safeguard this approach in the interim, and support the smooth integration of freight flex vessels in a way that balances both freight and passenger priorities. This will ensure Shetland’s industries, exporters, and communities continue to be well served.*

## **Q15. Additional Freight Comments**

*Freight services on NIFS are as central to Shetland’s lifeline connectivity as passenger travel. ZetTrans does not speak for industry or exporters, but strongly supports the need for their voices to be central in Transport Scotland’s considerations. On that basis, ZetTrans offers the following overarching comments:*

### *1. Lifeline principle*

- *Freight services must be explicitly recognised in the contract as a lifeline obligation, not secondary to passenger operations.*
- *The value of seafood exports, livestock shipping, fuel, retail supply, and construction materials to Shetland’s economy and community wellbeing cannot be overstated.*

### *2. Continuity of engagement*

- *The current operator has established strong, trusted relationships with hauliers and exporters, which should be safeguarded in any future contract.*
- *Ongoing structured engagement between operator, ZetTrans and industry is essential for forecasting, planning, and building confidence.*

### *3. Contractual clarity*

- *The contract should make clear how deck space is allocated and reallocated, ensuring efficient use of capacity.*
- *Processes should remain transparent and equitable, balancing freight and passenger needs.*

### *4. Resilience and future planning*

- *Freight flex vessels will add capacity and resilience, but integration must be carefully managed to balance priorities.*
- *Long-term planning should consider infrastructure needs (berths, marshalling, storage) in partnership with harbour authorities, with the operator contributing operational expertise.*

### *5. Data and monitoring*

- *Regular reporting of freight utilisation, cancellations, and reallocation would help build confidence and inform continuous improvement.*

### *Summary*

*ZetTrans recommends that the next contract secures freight's place at the heart of lifeline services. This means protecting the collaborative approach already established, ensuring transparent allocation, and planning proactively for future capacity through freight flex vessels and supporting infrastructure.*

## **Q16. Freight Charging**

*ZetTrans recognises that freight charging on NIFS services is a matter of real importance to Shetland's industries and economy. While ZetTrans does not represent individual businesses, it strongly supports the need for their voices to be central in any review of charging structures.*

*In considering future charging processes, ZetTrans suggests the following principles and enhancements:*

### *1. Fairness and equity*

- *Charges should reflect the lifeline nature of freight, ensuring Shetland's businesses are not placed at a competitive disadvantage due to distance.*
- *Any model should avoid creating disproportionate costs for key sectors such as seafood, livestock, and retail supplies.*

### *2. Transparency and predictability*

- *Charging structures should be clear, understandable, and predictable so that businesses can plan with confidence.*
- *The basis for charges (whether per lane metre, vehicle type, or commodity class) should be explicit and consistently applied.*

### *3. Flexibility and efficiency*

- *Consider differentiated charges that encourage efficient use of deck space (e.g. unaccompanied vs accompanied freight, consolidation of freight across different customers).*
- *Ensure processes support quick reallocation of cancelled or unused slots without penalising operators unfairly.*

### *4. Industry engagement*

- *Formal mechanisms should be built into the contract for ongoing dialogue with freight customers on charging policy and its impacts.*
- *Charging reviews should be informed by evidence from Shetland's exporters and importers.*

### *Summary*

*ZetTrans believes the next NIFS contract should embed principles of fairness, transparency, and predictability in freight charging, with strong industry involvement in shaping any changes. The aim should be to maintain Shetland's competitiveness, support efficient use of scarce capacity, and provide businesses with the clarity they need to operate confidently.*

### **Q17. Top 3 Priorities**

*ZetTrans believes the priorities for Shetland must reflect the lifeline nature of the service. While all the listed factors matter, three stand out:*

#### *1. Reliability and Punctuality*

- *The service is Shetland's critical lifeline. Reliability underpins access to health care, education, business, supply chains, and tourism. Without it, all other aspects fall away.*

#### *2. Affordability and equity of access (Other)*

- *Travel to and from Shetland is disproportionately expensive compared with other Scottish islands, due to both distance and the need for overnight accommodation. Affordability — including accommodation costs — must be recognised as a priority in its own right and will help support equity of access for all islanders.*

#### *3. Fair access to accommodation*

- *Overnight travel is unavoidable for Shetland. Cabins and pods are essential, and the way they are priced and allocated strongly affects community confidence. Fair access to accommodation is therefore a priority equal to reliability and affordability.*

*Note: Ease of booking, customer service, and catering are important, but secondary compared to the core issues of sufficient capacity, reliability, affordability, and fair access to accommodation.*

## Q18. Other Suggestions for Improvement

*ZetTrans recommends the following overarching improvements:*

- *Equity of access: Address the cost disadvantage faced by Shetland travellers due to distance and the necessity of overnight accommodation.*
- *Transparency: Ensure fair allocation of scarce resources (cabins, freight deck space) through transparent booking and reallocation processes.*
- *Accessibility: Embed inclusive design and service delivery across the contract, from booking to boarding to onboard provision.*
- *Partnership: Maintain and strengthen structured engagement with communities, hauliers, and local authorities, ensuring lifeline users' voices shape service delivery.*
- *Resilience and future proofing: Plan for fleet and infrastructure renewal (including freight flex vessels), environmental responsibility, and long-term sustainability.*
- *Means of capturing unmet/ unsatisfied demand: The significance of the capacity constraints on the Aberdeen – Kirkwall – Lerwick route needs to be better informed with data. The operator should establish means to capture this data.*

## Closing Statement

ZetTrans thanks Transport Scotland for the opportunity to contribute. The next NIFS contract is a vital opportunity to safeguard Shetland's lifeline services, building on current strengths while addressing affordability, equity, accessibility, environmental responsibility, and freight resilience. Industry and community voices must remain central to every decision.