

NOTICE TO AGENTS, BERTH AND SHIP OPERATORS No. 4 of 2020

PILOT TRANSFER ARRANGEMENTS

A number of deficiencies have been reported recently where pilot boarding arrangements have not met the required international and national standard and have been presented in an unsafe & dangerous manner. In 2019 the Port of London Authority alone saw a total of 88 Pilot ladder deficiency reports, and we are seeing the trend continue into 2020 with 24 reported deficient ladders so far this year. Pilot Ladder Deficiencies are our single most common deficiency.

Vessels arriving into the Port of London with deficient pilot boarding arrangements may have their movement cancelled. Pilots have the right to refuse boarding of a vessel which has rigged a non-compliant pilot transfer arrangement and retain the right to report the defect to port state control authorities. This can lead to serious delays and may result in the vessel being required to anchor until such deficiencies have been remedied. In some cases a full port state control inspection by the Maritime & Coastguard Agency may be carried out, which would lead to financial penalties.

Any pilot refusing to board a vessel for such reasons will have the full support and backing of the Port of London Authority.

Common Pilot Ladder deficiency's which often result in delays & PSC Inspections:

Pilot ladder secured by deck tongue

Although a common securing arrangement which may appear a simple solution to install and adjust a pilot ladder, this method is deemed **non compliant** in the UK and dangerous for anyone who might have to use it. Applicable regulations:

ISO799-1(2019) states that: *"each side rope shall have a breaking strength of at least 24kN and the diameter should be 18mm."*

ISO799-1(2019) states that *"each step shall have a strength of at least 8,8 kN"*

IMO1045(27) 2.1.1 *"the securing points etc shall be at least as strong as the side ropes"*.

Therefore, each side rope can handle 2400 kilos (4800 together) and that each step can handle a weight of 880 kilos. The strength of the deck tongue is often unknown nor tested and certificated.



Platform placed over the securing area of the ladder

A compliant platform built over the securing area of the pilot ladder can be seen to improve access, but can hide a non-compliant securing arrangement.

Pilots who encounter a platform over the ladder will often ask to check the securing arrangement. Should this be found non-compliant it may be reported as a deficiency to the Port Authority & local MCA office.



Embarkation Platform - Trapdoor System

Where the vessels freeboard exceeds 9m an arrangement consisting of both accommodation and pilot ladders is used. Some vessels are still presenting arrangements with the trapdoor which has not met IMO standards since 2012. (Pic 1)

IMO A.1045(27) 3.7 states the ladder has to “*extend above the lower platform to the height of the handrails*” and remain in alignment with and against the ship’s side. (Pic 2)



Pic 1



Pic 2

Securing Pilot ladder with Shackles

Shackles are a common pilot ladder securing deficiency. This is because although the IMO allows it: **IMO A.1045(27)**: 2.1.1 “*the securing strong points, **shackles**, and securing ropes should be at least as strong as the side ropes*” it must be noted the UK Authorities have declared the use of shackles as non-compliant, because this puts weight on the steps rather than the side ropes. When the pilot puts weight on the ladder, the ladder will move freely under the shackles until the next chocks and step has reached the shackles.



With immediate effect the master of any vessel subject to compulsory pilotage is required to ensure their vessel complies with safe boarding and landing for pilots within the Port of London Authority's jurisdiction in accordance with the IMO Convention for Safety of Life at Sea

Keel Laid	SOLAS Regulation	Effective Date	Invalid From
On or after 25/05/1980 Before 01/01/1994	SOLAS 1974 V/R.17	25/05/1980	In force
On or after 01/01/1994 Before 01/07/2002	SOLAS 91/92 V/R.17	01/01/1994	In force
On or after 01/07/2002 Before 01/07/2012	SOLAS 99/00 V/R.23	01/07/2002	01/07/2012 - Not in force
On or after 01/07/2012	SOLAS 10 V/R.23	01/07/2012	In force

Further information can be found in IMO Resolution A.1045 and the Shipping Industry Guidance on Pilot Transfer Arrangements.

IMO Resolution A.1045

<http://www.imo.org/en/KnowledgeCentre/IndexofIMOResolutions/Documents/A%20-%20Assembly/1045%2827%29.pdf>

Shipping Industry Guidance

<https://www.ics-shipping.org/docs/default-source/resources/safety-security-and-operations/shipping-industry-guidance-on-pilot-transfer-arrangements.pdf>

2 March 2020

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Harbour Master Lower



Owners, Agents and Charterers should ensure that the contents of this Notice are made known to the masters or persons in charge of their vessels or craft.

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PLEASE REGISTER VIA OUR WEBSITE www.pla.co.uk
Telephone calls, VHF radio traffic, CCTV and radar traffic images may be recorded in the VTS Centres at Gravesend and Woolwich

