

# 1000 cruise ships around.....

## Are their pilot transfer arrangements safe?

Some words on cruise ships and their compliance with SOLAS ch.V reg 23, IMO A.1045(27)?

By: Arie Palmers, registered Pilot

Photo's courtesy of UKMPA and Dangerousladders

At the start of 2020 a pandemic we haven't seen before in hundreds of years has struck the world, putting economies to a halt and had a devastating effect on the beautiful cruise business. International travel was hard or even impossible, crews were stuck on board for many months past the duration of their contracts, many people died or got severe illnesses and lot of people are still dealing with the consequences of COVID today. Luckily today we all are getting back on our feet, trade is picking up again and let's all just hope we can leave this page behind us.

Also, the cruise business is picking up again, even though a lot of cruise vessels have been scrapped over the past few years and thousands of people had lost their jobs consequently. As from now many people can now experience the wonderful travel on a cruise ship again!

The vessels that were able to continue supplying the world had the deal with a lot of regulations around COVID, IMPA was surprised and happy to see that in the blink of an eye all vessels worldwide had procedures around COVID, but that it seemed almost impossible over the past years to get pilot transfer arrangements up to standard over..... ( IMPA et al).



*A non-compliant arrangement, covid restrictions still in force obviously  
Facemasks do not only stop covid, but also rule out the necessity to blur a photo.....*

I did have the expectation that during the extended period in which especially cruise ships have been laid up, efforts would have been made to improve the pilot transfer arrangements (pta) on these vessels and in this article I would like to address the dos and don'ts on pta's pilots encounter on a daily basis on cruise vessels. I hope it will help you as a pilot/crewmember/surveyor/auditor/inspector etc etc to commute in a safe way.

Now the cruise business is re-starting I received quite a few photos on the pilot transfer arrangements they have rigged, and to my surprise, not much has changed unfortunately....

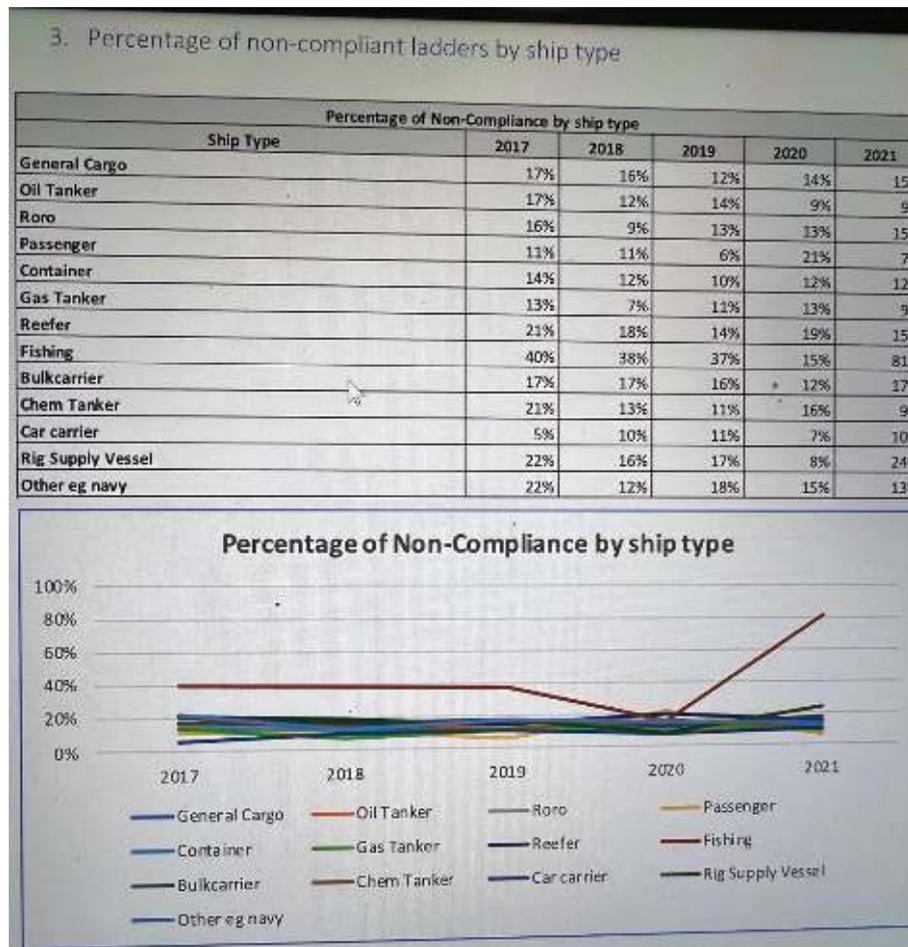


*Another non-compliant setup, dancing on the ceiling*

In the photo above we can clearly see the following non compliances:

- IAW SOLAS ch.V reg 23 rule 3.3.1.3 "each step shall firmly rest against the ship's side". Clearly not the case, the ladder is rigged from the deck-head and that way stability during usage is lost
- Does this ladder provide unobstructed access as per rule 4 of the requirements mentioned above? No, it is not: the pilot must crawl around the ladder or climb over the top of it to reach the entrance, therefore this is absolutely an unsafe practice!
- 4.1 also mentions that 2 handhold stanchions SHALL be provided, which clearly is not the case in this setup.
- Al lot of different types of vessels have this kind of arrangement, but then it is rigged adjacent to the pilot door and a small platform is provided.
- The simple solution in this setup is to secure it to deck and not the deck-head and install 2 stanchions at the required distance and dimensions as laid down in IMO A.1045(27) rule 5.

You probably know IMPA conducts a safety campaign on pilot transfer arrangements each autumn. Herman Broers ([www.pilotladdersafety.com](http://www.pilotladdersafety.com)) has made an analysis of the results of the last 5 safety campaigns to see if things are improving or not on this matter.



Year after year it seems that, despite the efforts of many, pilot transfer arrangements continue to be non-compliant. On passenger vessels we notice a variation between 7% and 21% non-compliance. It must be said that the last 2 years could be disturbing the overall results: cruise business was down due to Covid. In total the average in noncompliance according to IMPA is around 18%. In my own tally, published weekly on social media, there is a non-compliance of over 50%. This number is backup by the peer reviewed scientific paper “Snakes or Ladders” (E. Rattray et al).



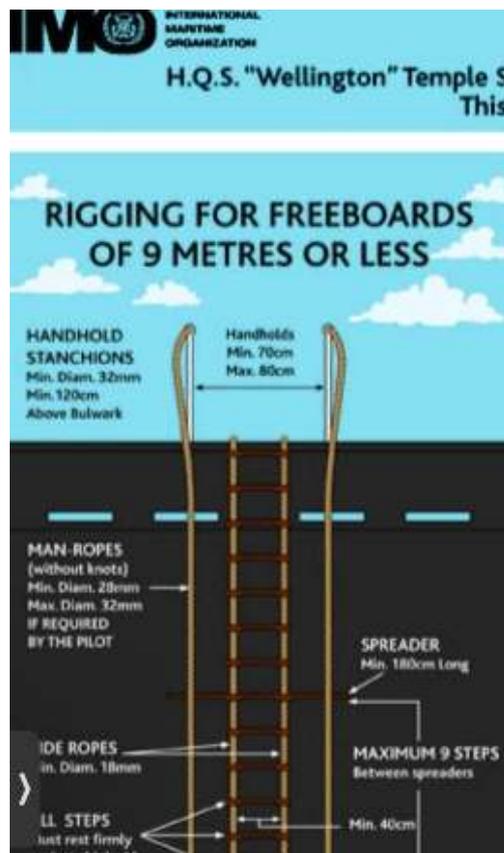
*a gift that keeps giving unfortunately...*



*A better setup yet still non-compliant*

At the setup above you can see that some (simple) changes have been made to get it right. The noncompliance you can spot is about the manropes being attached to the top of the stanchions:

SOLAS ch.V reg 23 rule 7.1.1 states that the manropes SHALL be secured to the deck.. That's fully understandable of course, yet the pilot ladder poster tells us something different:



Basically, the crew seemed to have looked at the pilot ladder poster (left panel) and basically copied it into their own arrangement. The fact there are errors in the pilot ladder poster again proves to be very confusing. This is therefore the reason the poster is as we speak under revision and will be modified and updated.



*Again, coming down from the deck-head*

The setup above... again the ladder comes down from the deck-head and we have already explained the consequences of it. When one of the cruise companies was contacted about their unsafe pilot transfer arrangement, the reply was that the vessel was built in 2004 and therefore did not have to comply due to a grandfather clause in SOLAS ch.V reg 23 and that IMO A.1045 was not valid because they were supposed to be under IMO A.889....

First, it is rather dreadful that a company that transports 1000s of people on a daily basis is hiding behind a grandfather clause (just for the record: there is no grandfather clause in the above-mentioned IMO recommendations.... IMO A.889 had been revoked when IMO A.1045 came into force.)

In this particular case I would just refer to rule 2.1 and 2.2 from SOLAS ch.V reg 23: "All arrangements used for pilot transfer shall efficiently fulfil their purpose of enabling pilots to embark and disembark SAFELY." Is this setup safe? No, it is not.. Don't use it...

One of my contacts told me that should he reject a cruise vessel due to a non-compliant pilot transfer arrangement, his head would be on the chopping block..... A rather disturbing statement! I fully understand the economical pressure is tremendous, which basically means safety first....after profit.

Knowing the importance of arriving and departing on schedule for cruise vessels, would urge these vessels to rule out anything that might lead to delays... Further down this article I will mention something about a cruise company that fully understands the importance of correct pilot transfer arrangements and they took the time to convert them into compliant and safe ones..

Besides all the above, you can also see the ladder isn't against the hull: ship's fendering prevents that. Also, this can prevent the safe approach of the pilot launch and therefore should be cut back for at least 6m. (IMO A.1045 rule 6 and SOLAS ch. V reg 23 rule 3.3.1.3)



*A bit better...or..less bad..*

In the photo above, which is a similar vessel as a bit more up in the article, we can clearly see some adjustments have been made: stanchions are in place (are they 70-80cm apart from each other??), but can someone climbing the ladder use them? In my opinion it is good practice that these vessels are thinking about adjustments and executing them. Should they have gotten into the rules and contact the right people, it would have been correct already; now still further adjustments must be made. Again the ladder is not against the hull due to belting/fendering.

One of the leading classification agencies told me that in the past they approved systems where the ladder isn't secured to the deck, but in the present time it absolutely will not be approved anymore. Good to have class on the same page! Would this mean that at future class surveys these arrangements would be banned? I would certainly hope so.



*Again, non-compliant..*

On this photo at least the ladder is secured to strongpoints on deck, and the correct stanchions are in place. Seems quite ok to use except for 3 other non-compliances: we see (again) the manropes secured at the top of the stanchions. We already saw the cause of this practice and besides that, they have covered the side ropes for protection.. It is not allowed because IMO A.1045 states that the side ropes must be of uncovered rope. When the side ropes are covered, it is not possible anymore to see whether they are damaged or not. Another point is that covered side ropes don't dry but stay wet.. This will cause rot and rapid deterioration of the side ropes. We see here the ladder is suspended over a sharp deck-edge, which probably is the reason they have covered them. An easy solution to this problem is the so called 'fish plate' ( a piece of half round pipe to guide the ladder down). And finally the ladder is (yet again) not against the hull due to fendering/belting.

A while ago I was approached by a deck officer who serves on one of the well known cruise liners. He was looking to improve their pilot transfer arrangements. To accomplish this, the officer had written a notice that was sent to all vessels in their fleet, explaining how to change non-compliant set-ups into good ones. He has used several sources in his research and of course listed them in his article.

By now all their arrangements are compliant! Way to go!!



*It can be done!!!!*

- Secured to strongpoints on deck
- Manropes secured to strongpoints on deck
- Correct stanchions

To end this article, we can draw some conclusions:

- Many cruise vessels have not changed their arrangements yet
- The regulations regarding pta's are confusing on several points
- The regulations regarding pta's are contradictory on several points
- All crews are very willing to do the job right
- Pilots can get into trouble when they would reject a non-compliant pta
- Former class approved arrangements will now be rejected by class

And finally, of course I would like to make some recommendations on how to improve pilot transfer safety (not just for pilots, but for anyone who might have to use these arrangements).

Some recommendations:

- Ship designers are encouraged to consider all aspects of pilot transfer arrangements at an early state in design (IMO A.1045 rule 1)
- Vessel owners should always contact Subject Matter Experts when in doubt
- Everyone who encounters a non-compliant arrangement is encouraged to report. If you do not want to report to PSC, despite the legal obligation to report deficiencies, please report to [www.Chirpmaritime.org](http://www.Chirpmaritime.org) . By doing so, your report will be treated fully confidentially. The report will be anonymized by Chirpmaritime, and they will engage in contacting all involved parties to work out a good solution for the problem.
- Always explain what is wrong and what can be done to improve. All crews will welcome your feedback, because everyone wants to do his or her job to their best abilities
- It can be difficult for crews to follow up: the must work with what they get provided.

I did not refer to ISO799-01 and MED4.49 in the article because not all (EU) countries accept these as a standard to comply with.

I hope you have enjoyed reading this article and that it will help you to increase the safety of yourself as well as the people around you. Please stay safe everyone and keep coming back home vertically rather than horizontally.

Arie Palmers

Registered pilot



*Dancing on the ceiling again.....*