

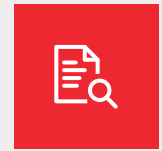
# SAFETY CAMPAIGN



2023

# INTRODUCTION

IMPA represents the international community of pilots. We use the resources of our membership to promote effective safety outcomes in pilotage as an essential public service.



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## IMPA BELIEFS

1. The public interest is best served by a fully regulated and cohesive pilotage service free of commercial pressure.
2. There is no substitute for the presence of a qualified pilot on the bridge.
3. IMO is the prime authority in matters concerning safety of international shipping.
4. All states should adopt a responsible approach based on proven safety strategies in establishing their own regulations, standards and procedures with respect to pilotage.
5. IMPA represents the international community of pilots. We use the resources of our membership to promote effective safety outcomes in pilotage as an essential public service.
6. Existing and emerging information technologies are capable of enhancing on-board decision making by the maritime pilot.

Capt. Adam Roberts, Vice President & Chairman of the IMPA Safety Sub-Committee

2023 has been an important year for the safety of pilot transfer arrangements. The International Maritime Organization (IMO) is working now to amend SOLAS regulation V/23 and its associated recommendations. This work is anticipated to result in an enhanced and more robust safety regime for pilot transfer arrangements for the benefit of pilots and other users.

Critical aspects of the proposed amendments speak directly to the results presented here and in previous years. Those aspects are :

- Mandatory requirements and the removal of extensive grandfathering risk
- Approval by Administrations, quality management systems and third-party certification
- Addressing trapdoor arrangements based on ISO 799-3:2022
- Standards alignment between IMO instruments and ISO 799
- Securing pilot ladders at intermediate length
- Mandatory training, inspection and maintenance requirements
- Mandatory maximum service life for pilot ladders and man-ropes
- Amendments to SOLAS Chapter V, Regulation 23

But, that change is not expected to enter into force until 2028. In the meantime, the focus must be on raising awareness of the need for pilot transfer arrangements to be procured, inspected, maintained and rigged in compliance with SOLAS regulation V/23, taking complete account of the ISO 799 standards.

The results of the 2023 Safety Campaign show that historical trends in non-compliance continue. The headline non-compliance rate remains over sixteen percent, and the main determinant of non-compliance remains pilot ladders. Pilot ladder observations are included in more than fifty percent of reports of non-compliant arrangements. These trends are highlighted in Figure 1.

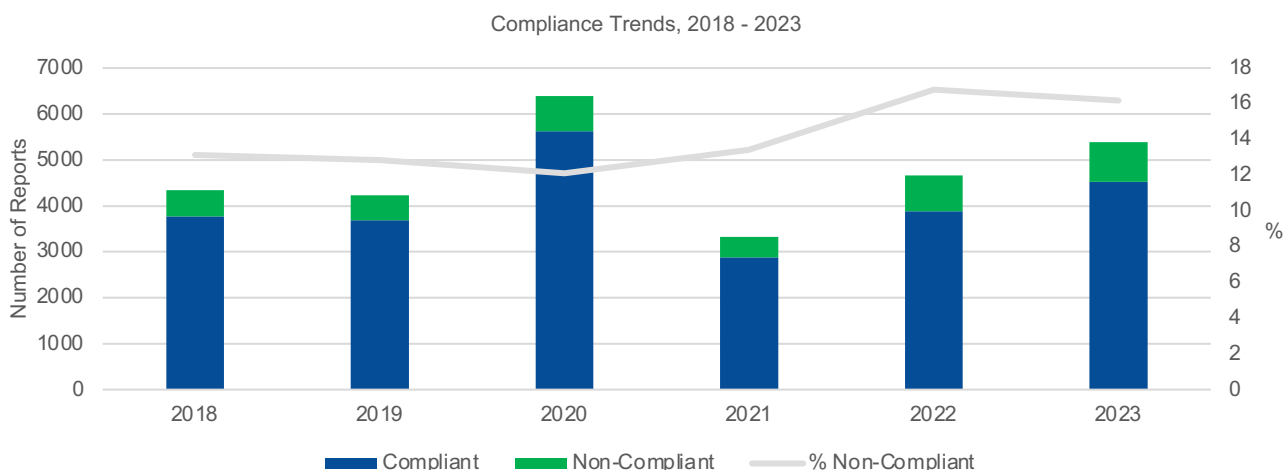


Figure 1: Compliance Trends, 2018 - 2023

In this respect, it is appropriate to re-iterate the following. We consider SOLAS regulation V/23, its associated IMO Assembly resolutions, and the ISO 799 series standards the minimum requirement, not an aspirational target. IMPA advocates for pilots not to use and to report arrangements that do not conform to these standards.

Trapdoor arrangements remain a perennial challenge, and we would encourage more shipowners and operators using them to take proactive steps to provide compliant and safe arrangements based on ISO 799-3:2022.

Similarly, procurement and maintenance policies focused on quality and a finite service life are critical to ensuring that safe equipment is always available.

We recommend that those responsible for procuring pilot ladders and associated equipment rely on the services of reputable manufacturers and do not accept equipment that does not have valid third-party certification against the requirements of SOLAS regulation V/23 and ISO 799-1:2019. If in doubt, do not accept the equipment – the lives of pilots, seafarers, inspectors, and surveyors may depend on it.

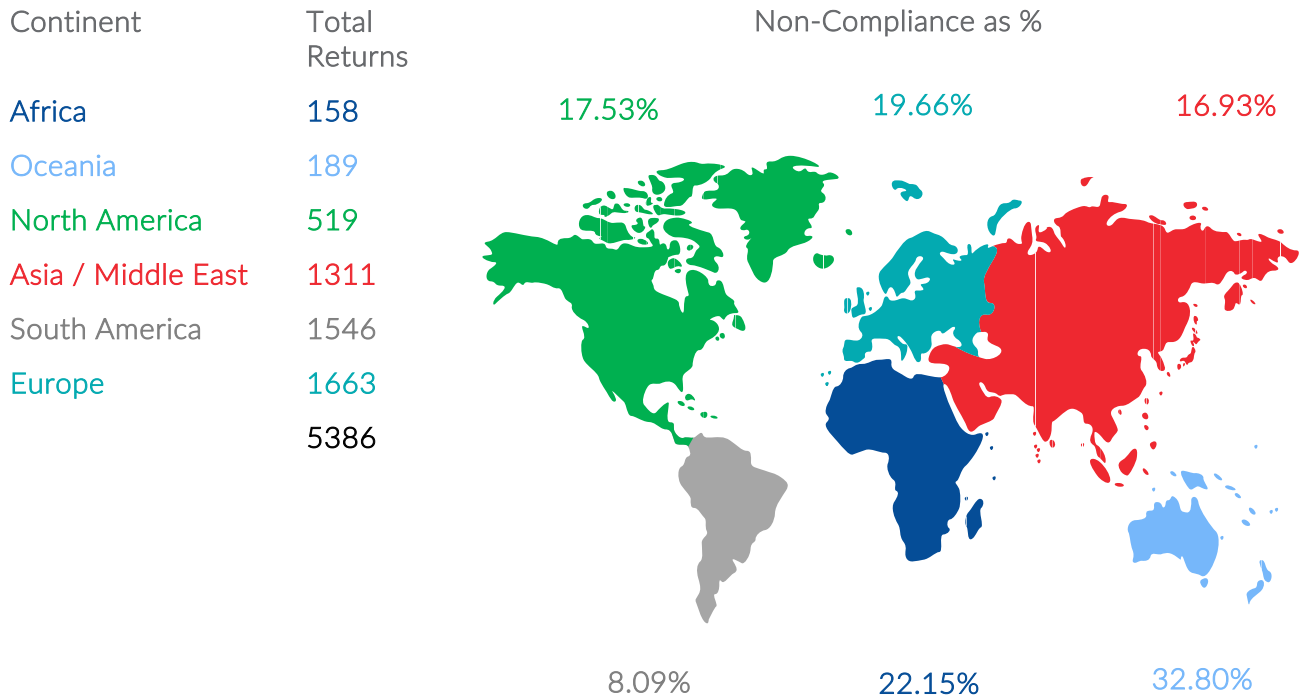


Company procedures in approved safety management systems should be clear and effective, at least reflect the latest ISO 799-2:2021, and emphasise timely pilot ladders and man-ropes replacement. Where the safety of life is concerned, it is better to replace before failure than maintain to the point of failure.

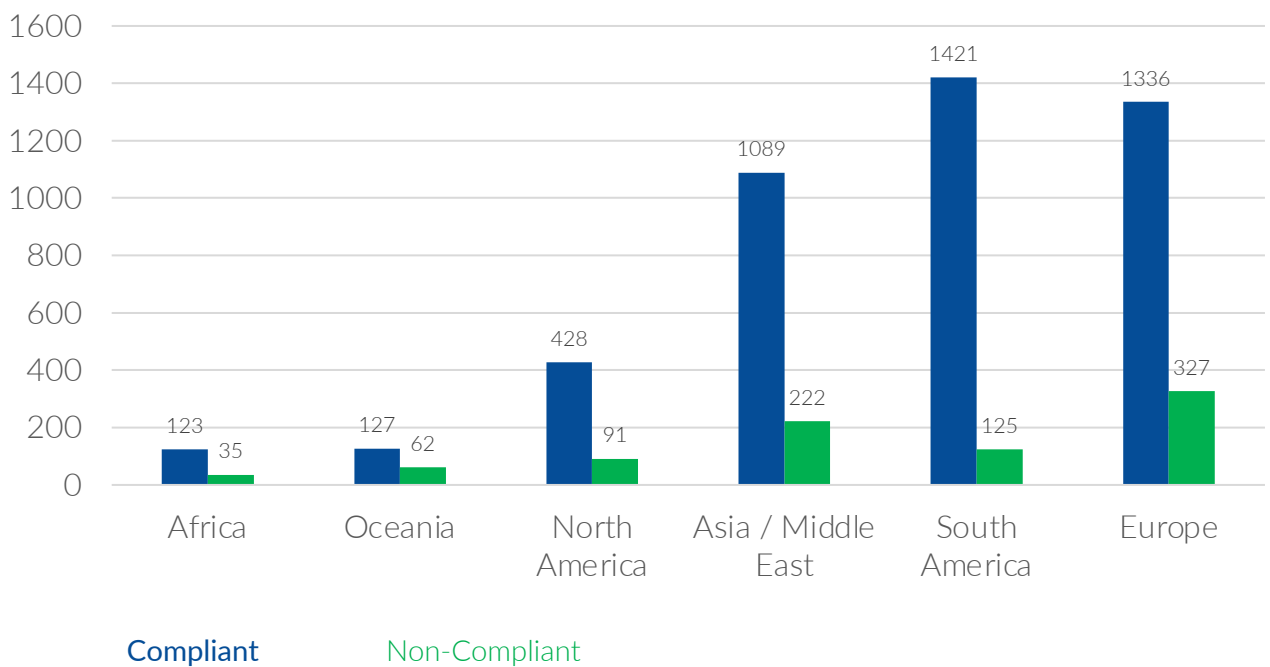
IMPA is optimistic about the prospects for safe pilot transfer arrangements that enable pilots to focus on providing a public service for the safety of navigation, prevention of pollution and efficiency of maritime trade. In the meantime, we urge industry and equipment suppliers to act now so we can realise the expectation of safer pilot transfer arrangements tomorrow, today.

# PARTICIPANTS

The charts below illustrate data from 5386 returns provided by participating IMPA members, which have been grouped into six geographical areas.



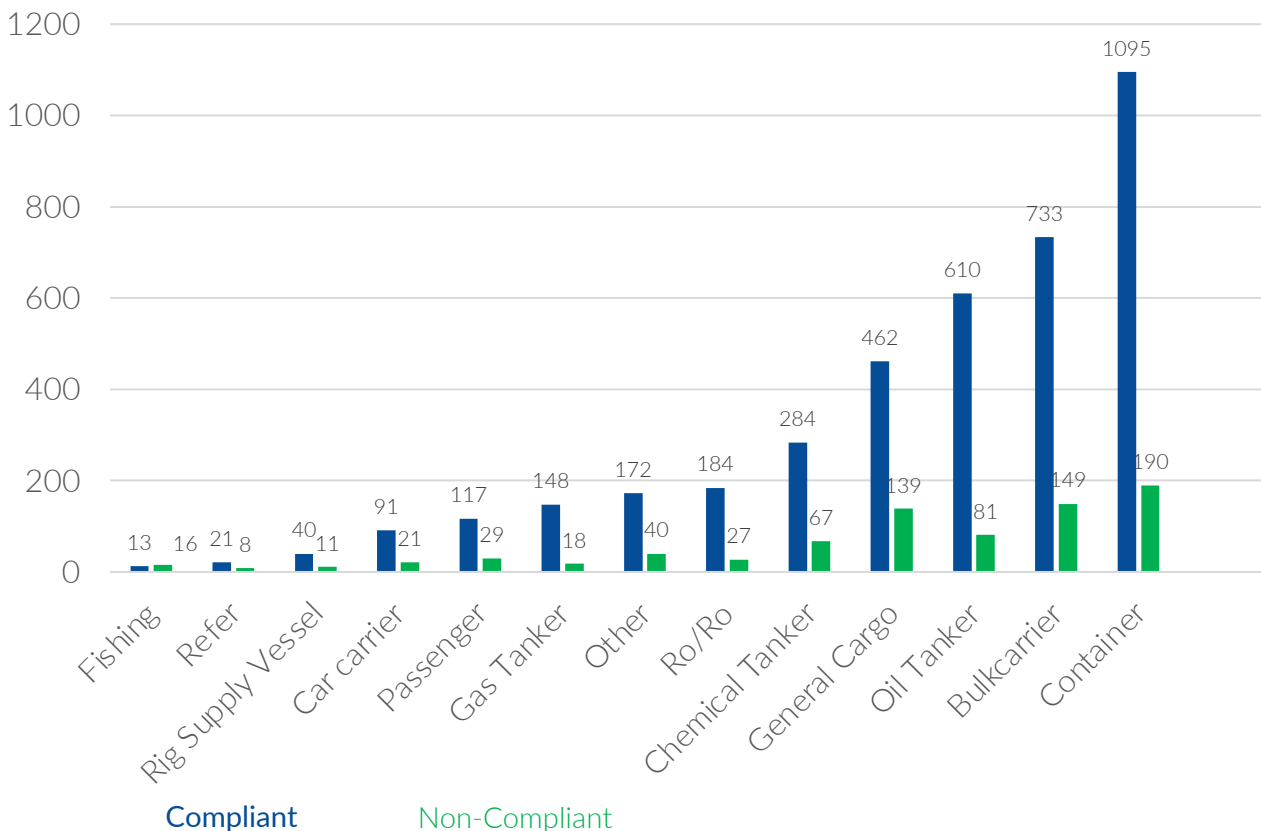
## Compliant and Non-Compliant By Region



## SHIP TYPE

Vessel Type	Total Number of Vessels	Compliant	Non-Compliant	Non-Compliant as %
Reefer	29	21	8	27.59
Fishing	29	13	16	55.17
Rig Supply Vessel	51	40	11	21.57
Car Carrier	112	91	21	18.75
Passenger	146	117	29	19.86
Gas Tanker	166	148	18	10.84
Ro/Ro	211	184	27	12.80
Other	212	172	40	18.87
Chemical Tanker	351	284	67	19.09
General Cargo	601	462	139	23.13
Oil Tanker	691	610	81	11.72
Bulkcarrier	882	733	149	16.89
Container	1285	1095	190	14.79

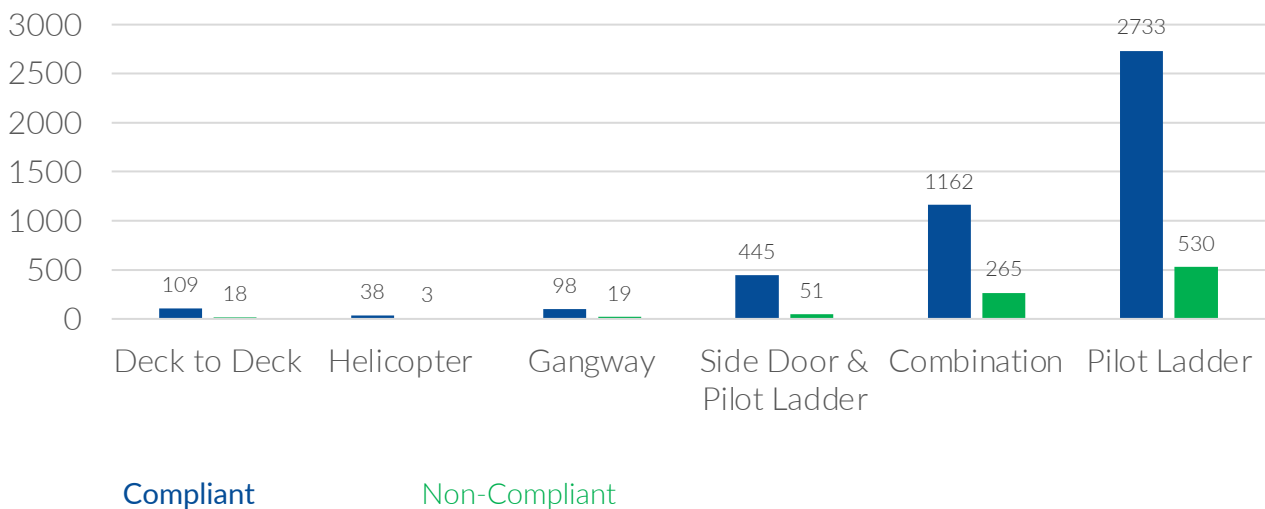
### Compliant and Non-Compliant By Vessel Type



## MEANS OF TRANSFER

Compliance by Means of Transfer	Total Number	Compliant	Non-Compliant	Non-Compliant as %
Pilot Ladder	3275	2733	530	16.18
Combination	1428	1162	265	18.56
Side Door & Pilot Ladder	498	445	51	10.24
Gangway	119	98	19	15.97
Helicopter	41	38	3	7.32
Deck to Deck	127	109	18	14.17

Compliant and Non-Compliant by Transfer Arrangement

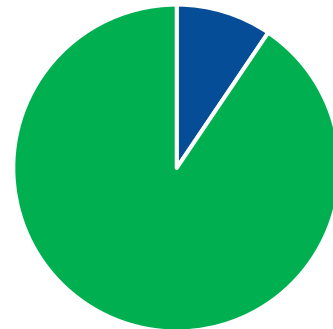


## NON-COMPLIANCE BY TYPE OF DEFECT

The first pie chart shows the percentage of the defects that were reported to the appropriate authorities, including but not limited to Port State Control. The second pie chart shows non-compliant by type of defect. Both the number and percentage are shown.

<b>Total number of non-compliant reports</b>	<b>862</b>
No. of defects reported to the appropriate authorities	78
No. of defects not reported to the appropriate authorities	784
% of non-compliant ships reported	9.5
% of non-compliant ships not reported	90.95

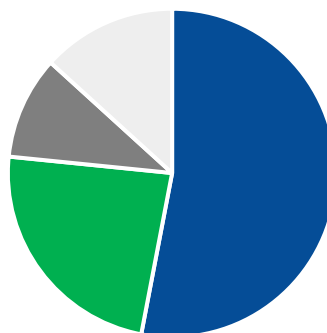
Reported to Authority



- % of non-compliant ships reported
- % of non-compliant ships not reported

Non-Compliant by Type of Defect	Total	As %
Pilot Ladder	580	53.02
Bulwark/Deck	258	23.58
Combination	111	10.15
Safety Equipment	145	13.25

Non-Compliance by Type of Defect



- Pilot Ladder
- Bulwark/Deck
- Combination
- Safety Equipment

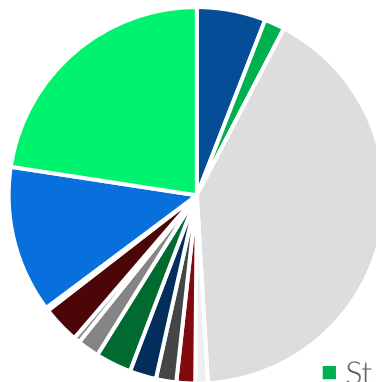


# NON-COMPLIANCE BY TYPE OF DEFECT

## PILOT LADDER

Defects of Pilot Ladder	Total	As %
Not against ship's hull	44	5.91
Steps not of suitable material	13	1.75
Poorly rigged retrieval line	308	41.4
Steps broken	8	1.08
Steps not equally spaced	12	1.61
Pilot Ladder more than 9 metres	13	1.75
Steps dirty/slippy	17	2.28
Sideropes not of suitable material	23	3.09
Pilot ladder too far forward/Aft	14	1.88
Steps painted or varnished	4	0.54
Incorrect step fittings	24	3.23
Not bulwark ladder	2	0.27
Steps not horizontal	94	12.63
Other	168	22.58

Pilot Ladder

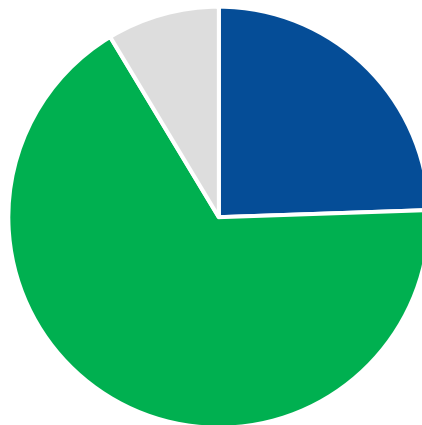


- Not against ship's hull
- Steps not of suitable material
- Poorly rigged retrieval line
- Steps broken
- Steps not equally spaced
- Pilot Ladder more than 9 metres
- Steps dirty/slippy
- Sideropes not of suitable material
- Pilot ladder too far forward/Aft
- Steps painted or varnished
- Incorrect step fittings
- Not bulwark ladder
- Steps not horizontal
- Other

# NON-COMPLIANCE BY TYPE OF DEFECT BULWARK DECK

Defects of Bulwark/Deck	Total	As %
No/faulty handhold stanchions	68	24.46
Ladder not secured properly	186	66.91
Other	24	8.63

Bulwark / Deck

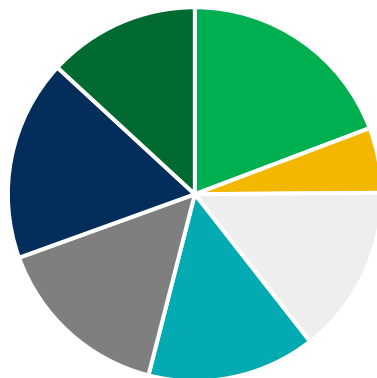


■ No/faulty handhold stanchions ■ Ladder not secured properly ■ Other

# NON-COMPLIANCE BY TYPE OF DEFECT COMBINATION ARRANGEMENT

Combination Defects	Total	As %
Accommodation ladder not leading aft	0	0
Lower platform stanchions/rail incorrect rigged	41	19.25
Accommodation ladder too steep (>45 degrees)	12	5.63
Pilot ladder not attached 1.5m above accommodation ladder	31	14.55
Lower platform not horizontal	31	14.55
Ladder(s) not secured to ship's side	33	15.49
Lower platform less than 5 metres above the sea	37	17.37
Other	28	13.15

Combination Arrangement



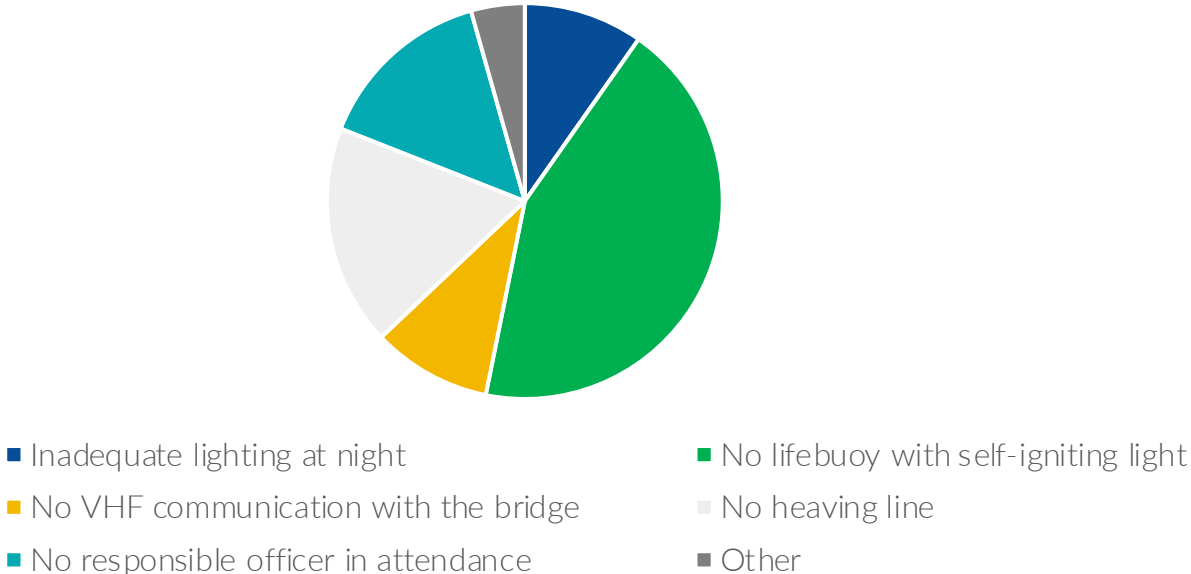
- Accommodation ladder not leading aft
- Lower platform stanchions/rail incorrect rigged
- Accommodation ladder too steep (>45 degrees)
- Pilot ladder not attached 1.5m above accommodation ladder
- Lower platform not horizontal
- Ladder(s) not secured to ship's side
- Lower platform less than 5 metres above the sea
- Other

# NON-COMPLIANCE BY TYPE OF DEFECT

## SAFETY EQUIPMENT

Safety Equipment Defects	Total	As %
Inadequate lighting at night	20	9.76
No lifebuoy with self-igniting light	89	43.41
No VHF communication with the bridge	20	9.76
No heaving line	37	18.05
No responsible officer in attendance	30	14.63
Other	9	4.39

Safety Equipment



# SAFETY CAMPAIGN 2023

## THE INTERNATIONAL MARITIME PILOTS' ASSOCIATION

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Senior Vice President & Treasurer

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Secretary General

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Director, Sustainability and Relationships

Eliane Blanch

Administrative Assistant

Joselyn Luyiga

### IMPA Headquarters

30 Millbank

SW1P 4DU

London, UK

