

MARITIME SAFETY COMMITTEE
110th session
Agenda item 3

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AMENDMENTS TO MANDATORY INSTRUMENTS

Editorial modifications to the draft performance standards for pilot transfer arrangements

Submitted by IMPA

SUMMARY

Executive summary: This document provides proposed editorial amendments to paragraph 4.1.5 of the draft new performance standards for pilot transfer arrangements presented in annex 6 to document MSC 110/3.

*Strategic direction,
if applicable:* 7

Output: 7.44

Action to be taken: Paragraph 13

Related documents: MSC 110/3; MSC 109/22 and Add.1, and NCSR 11/19/Add.1

Introduction

1 MSC 109 approved the draft MSC resolution on performance standards for pilot transfer arrangements with a view to adoption at this session, in conjunction with the adoption of the associated amendments to SOLAS regulation V/23, which make the performance standards mandatory under the 1974 SOLAS Convention (MSC 109/22, paragraph 13.14). The draft MSC resolution has been reproduced in annex 6 to document MSC 110/3.

Background

Pilot ladder steps

2 Paragraph 4.1.5 of the draft new performance standards for pilot transfer arrangements specifies that ladder steps:

"shall be long enough to accommodate a distance between the inner surface of the side ropes of not less than 400 mm, and shall be 115 mm in width and 25 mm in depth, excluding any non-slip device or grooving;"

3 Paragraph 2.1.2.5 of the annex to resolution A.1045(27) on *Pilot transfer arrangements*, as amended by resolution A.1108(29), states that ladder steps:

"should be not less than 400 mm between the side ropes, 115 mm wide and 25 mm in depth, excluding any non-slip device or grooving;"

4 Throughout the work to develop the draft new performance standards, it was intended to provide additional clarity on what was meant by the phrase "between the side ropes". It was not intended to amend the specification for the dimensions of pilot ladder steps or to introduce a misalignment with standard ISO 799-1:2019 by specifying an exact width and depth.

Handholds on shipside openings

5 Paragraph 8.3 of the draft new performance standards addresses securing handholds in shipside openings. The second sentence reads:

"Each handhold shall be rigidly secured and locked to the ship's structure at its base in two places and be locked into place to prevent dislodgement and shall extend not less than 1.2 m above the entry threshold."

Discussion

Pilot ladder steps

6 The sentence structure in paragraph 2.1.2.5 of resolution A.1045(27) means that the phrase "*not less than*" applies to all clauses containing the measurements defining the dimensions of pilot ladder steps in the sentence (distance between side ropes, width and depth of the steps).

7 However, the sentence structure in paragraph 4.1.5 of the draft new performance standards has resulted in the phrase "*not less than*" applying to the clause containing the distance between the side ropes only. The width and depth of the pilot ladder steps are now specified as exactly 115 mm and 25 mm, respectively, rather than not less than 115 mm and 25 mm.

8 IMPA considers this as an editorial issue, rather than a technical matter because it is a consequence of sentence structure, not a need or intention to amend the specification of pilot ladder steps.

9 Notwithstanding that this is an editorial issue, leaving paragraph 4.1.5 of the draft new performance standards as is would be counterproductive from the perspectives of the design, sustainability, reliability and availability of safe and compliant pilot ladders. This has been confirmed through discussions with two pilot ladder manufacturers.

10 In addition, to avoid potential confusion about the dimensions of pilot ladder steps, replacing the word "depth" with "thickness" in paragraph 4.1.5 of the draft new performance standards is recommended. This is the only paragraph defining or referring to the dimensions of pilot ladder steps in the draft new performance standards.

Handholds on shipside openings

11 The second sentence in paragraph 8.3 of the draft new performance standards is open to misinterpretation. A handhold cannot be rigidly secured and locked to the ship's structure in two places if those two places are at the base of the handhold. This can be addressed by aligning the second sentence of paragraph 8.3 with the second sentence of paragraph 8.1.

Proposal

12 The Committee is invited to instruct the drafting group on amendments to mandatory instruments, if established, or the Secretariat, to make the following editorial modifications to annex 6 to MSC 110/3, as follows:

.1 paragraph 4.1.5 of the draft performance standards should be modified to read:

"5 they shall be long enough to accommodate a distance between the inner surface of the side ropes of not less than 400 mm, and shall be ~~not less than~~ 115 mm in width and 25 mm in ~~thickness~~ ~~depth~~, excluding any non-slip device or grooving;" and

.2 the second sentence of paragraph 8.3 of the draft performance standards should be modified to read:

"Each handhold shall be rigidly secured and locked to the ship's structure at ~~or near its base and a higher point in two places~~ and be locked into place to prevent dislodgement and shall extend not less than 1.2 m above the entry threshold."

Action requested of the Committee

13 The Committee is invited to consider the proposals in paragraph 12 and take action, as appropriate.
