

SAFETY CAMPAIGN



2022



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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.

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 Existing and emerging information technologies are capable of enhancing on-board decision making by the maritime pilot.

IMPA Safety Survey 2022

As with previous years the 2022 Safety Campaign highlights persistent non-compliance. We consider SOLAS regulation V/23, its associated IMO Assembly resolutions, and the ISO 799 series standards as the minimum requirement not an aspirational target.

Ports and pilotage providers are requesting information from ships on the age and certification of their pilot ladders. We are aware of reports of pilots refusing to board ships due to non-compliance with SOLAS regulations and non-conformities with ISO standards. The courage shown by pilots and ports in rejecting ships with non-compliant pilot transfer arrangements is to be admired. We expect more pilots and ports to adopt this approach if the persistence in pilot ladder defects continues. All pilot ladder issues can be fixed easily and cheaply.

IMPA welcomes the proactive approach of some ship owners to pilot transfer safety. Policies and procedures relating to the modification of trap-door arrangements, and giving pilot ladders a finite service life are actions which IMPA applauds.

Sadly, for some of these owners, their actions are undermined by the existence and supply of falsely certified and sub-standard pilot ladders. Self-certification by manufacturers is not a guarantee of quality. We would recommend that those responsible for procuring pilot ladders and associated equipment rely on the services of reputable manufacturers. Pilot ladders should not be accepted if not accompanied by valid third-party certification against both the requirements of SOLAS regulation V/23 and ISO 799-1:2019.

A high-quality, third-party certified pilot ladder supplied with care and an instruction manual from a reputable supplier costs approximately \$900. The presentation of a non-compliant pilot ladder speaks volumes about the overall safety culture onboard a ship and in the company responsible for managing it.

Unless those responsible for the design, construction, certification and operation of ships give pilot transfer arrangements the attention they deserve, we will remain concerned about

the unnecessary and persistent human cost. The industry is under pressure to reduce its carbon intensity and cut its greenhouse emissions. What cost will be associated with disruption to otherwise optimised voyages if a ship is unable to embark a pilot because of the condition of transfer arrangements?

We are in no doubt that treating pilot ladders as safety critical consumable items with a finite service life is a necessary step forward. It is in the interests of maritime pilots and shipboard personnel to make the maintenance of pilot transfer arrangements as simple as possible.

Pilots report that the crews they interact with say consistently they are busy people with conflicting priorities and time pressure. Repairing pilot ladders as a matter of routine onboard ships is now a traditional aspect of seamanship that really should be considered a last resort. Replacement is the most effective form of maintenance.

Shipowners need to support their personnel by implementing time-based replacement of pilot ladders and associated equipment. Company procedures contained in approved safety management systems should be clear and effective, at least reflect the latest ISO 799 series standards, and emphasise timely replacement. Far better to replace safety critical equipment too early than a minute too late.

"Replace them early, replace them often" is the best policy anybody involved in ship management can have.

There appears to be a rise in the number of marine pilots responding to social media posts normalising the rejection of non-compliant arrangements. There was unequivocal support at IMO in November 2022 for China's proposal to amend SOLAS regulation V/23. To us, this indicates the days of industry relying on the can-do attitude of marine pilots and their willingness to overlook non-compliant transfer arrangements are numbered.

IMPA looks forward to participation in the IMO's work in 2023 and we hope to make significant progress with amendments to SOLAS regulation V/23 to fully support the provision of safer pilot transfer arrangements.





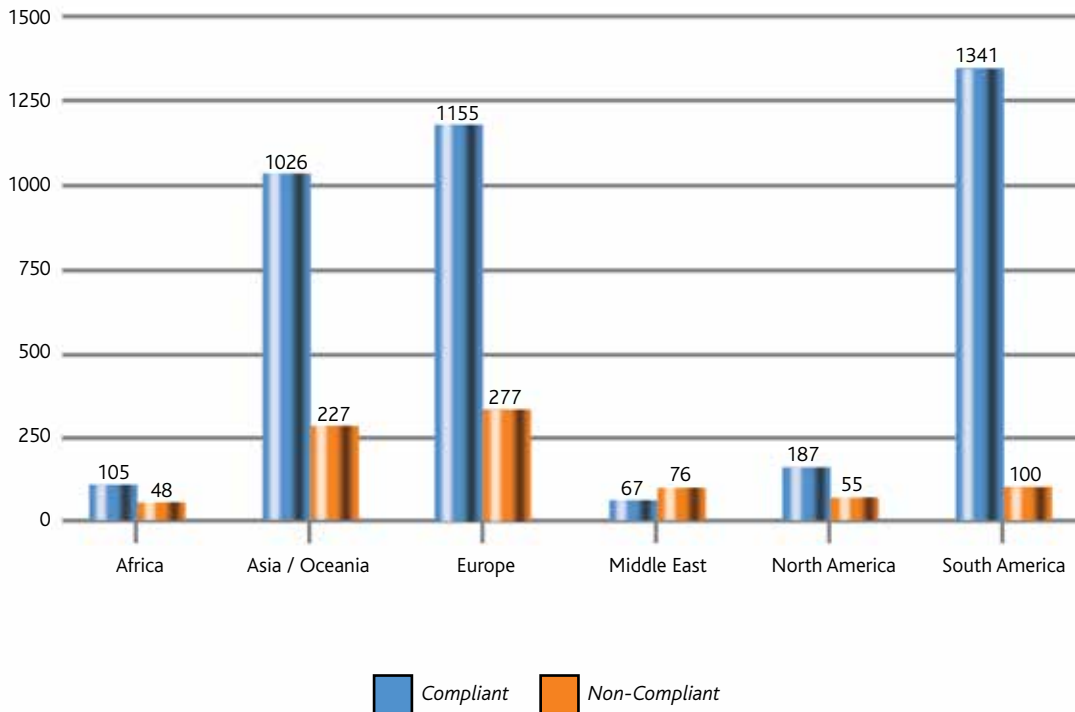
PARTICIPANTS

The chart below shows 4664 returns from participating IMPA members which have been grouped into 6 geographical areas.

REGIONS	TOTAL RETURNS	COMPLIANT	NON COMPLIANT	NON COMPLIANT AS %
Africa	153	105	48	31.37
Asia / Oceania	1253	1026	227	18.12
Europe	1432	1155	277	19.34
Middle East	143	67	76	53.15
North America	242	187	55	22.73
South America	1441	1341	100	6.94
TOTAL	4664	3881	783	16.79



COMPLIANCE AND NON-COMPLIANCE BY REGION



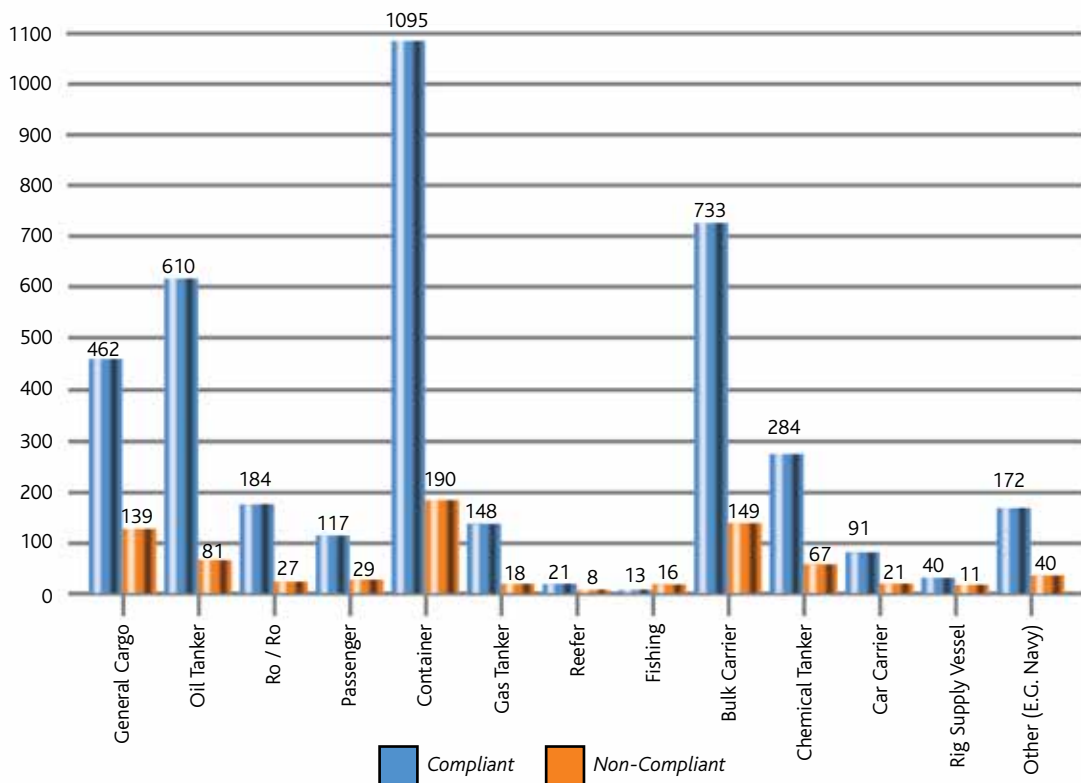
SHIP TYPE

The following chart shows a breakdown of all returns by ship type.

SHIP TYPE	TOTAL NUMBER OF SHIPS	COMPLIANT	NON COMPLIANT	NON COMPLIANT AS %
General Cargo	601	462	139	23.13
Oil Tanker	691	610	81	11.72
Ro/Ro	211	184	27	12.80
Passenger	146	117	29	19.86
Container	1285	1095	190	14.79
Gas Tanker	166	148	18	10.84
Reefer	29	21	8	27.59
Fishing	29	13	16	55.17
Bulkcarrier	882	733	149	16.89
Chemical Tanker	351	284	67	19.09
Car Carrier	112	91	21	18.75
Rig Supply Ship	51	40	11	21.57
Other (E.G. Navy)	212	172	40	18.87



COMPLIANCE AND NON-COMPLIANCE BY SHIP TYPE





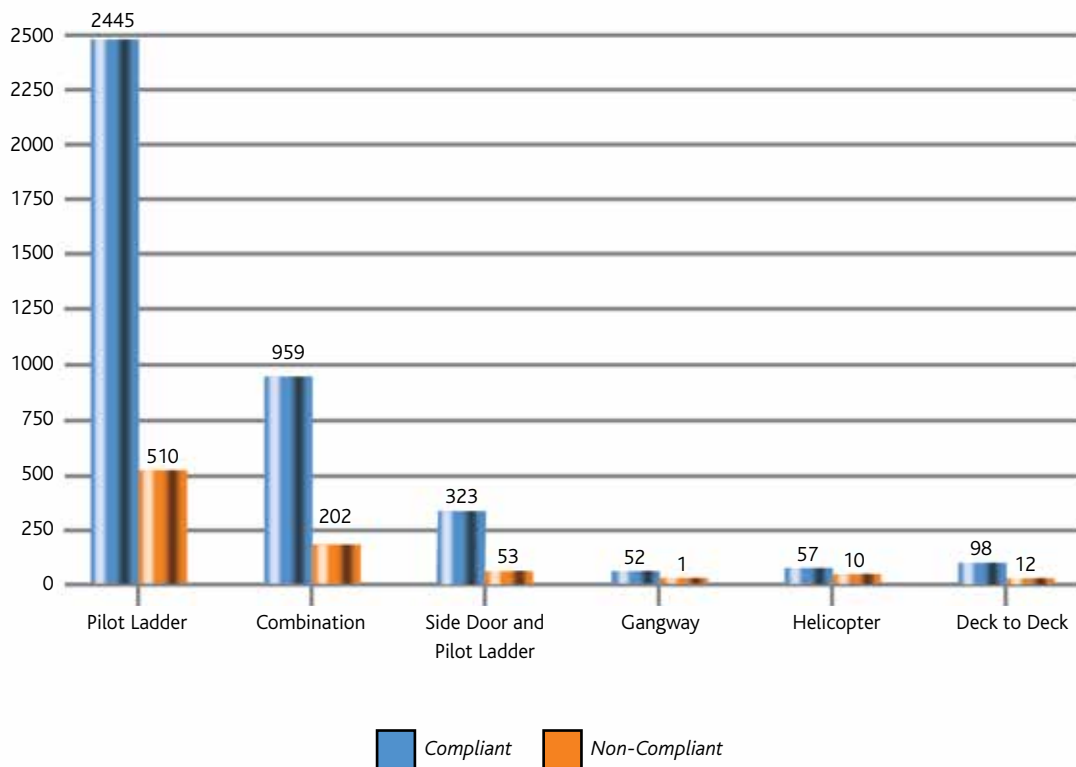
MEANS OF TRANSFER

The following chart shows a breakdown of all returns by means of transfer.

MEANS OF TRANSFER	TOTAL NUMBER	COMPLIANT	NON COMPLIANT	NON COMPLIANT AS %
Pilot Ladder	2955	2445	510	17.26
Combination	1161	959	202	17.40
Side Door and Pilot Ladder	376	323	53	14.10
Gangway	53	52	1	1.89
Helicopter	67	57	10	14.93
Deck to Deck	110	98	12	10.91



COMPLIANCE AND NON-COMPLIANCE BY MEANS OF TRANSFER





NON-COMPLIANCE BY TYPE OF DEFECT

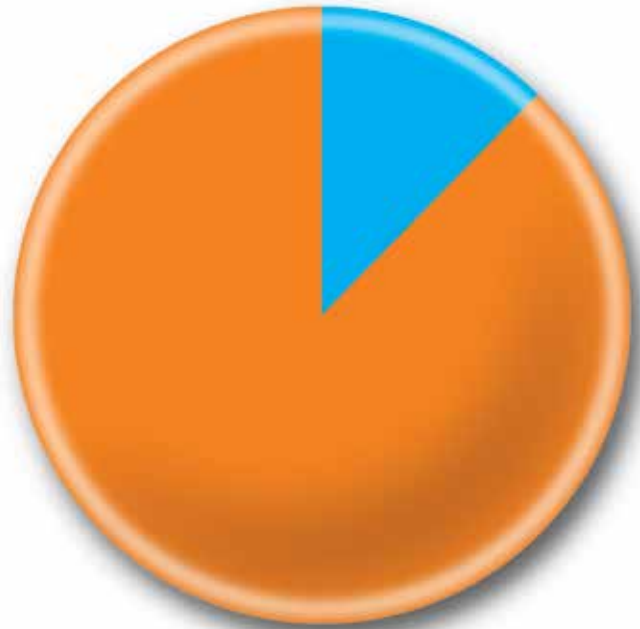
The first pie chart shows the percentage of the defects that were reported and not reported to the Authority. The second pie chart shows non-compliance by type of defect. Both the number and percentage are shown.

DEFECTS REPORTED TO AUTHORITY

TOTAL NUMBER OF NON-COMPLIANT IN SURVEY	783
Number of defects reported to Authority	95
% of non-compliant ships reported	12.13
% of non-compliant ships not reported	87.87


% of non-compliant ships reported 


% of non-compliant ships not reported 





NON-COMPLIANCE BY TYPE OF DEFECT

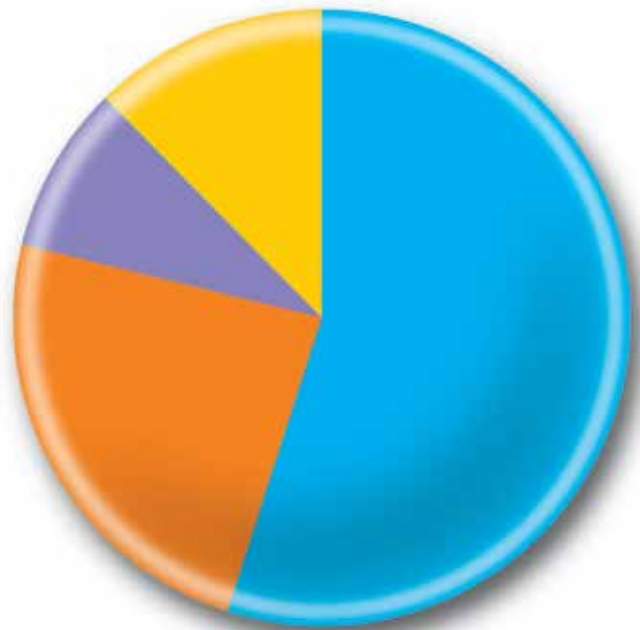
NON-COMPLIANT BY TYPE OF DEFECT	TOTAL	AS %
Pilot ladder	556	55.27
Bulwark/Deck	237	23.56
Combination	88	8.75
Safety Equipment	125	12.43

Pilot Ladder 

Bulwark/Deck 

Combination 

Safety Equipment 



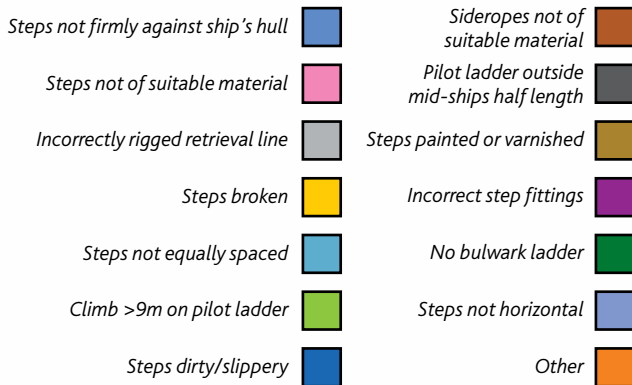
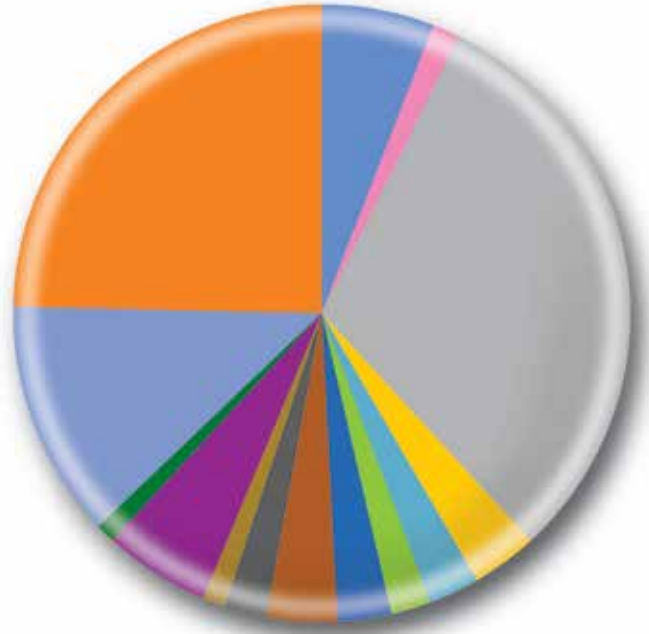


NON-COMPLIANCE BY TYPE OF DEFECT

The first pie chart shows the types of defects of the pilot ladder. Both the number and percentage are shown. The second pie chart shows the types of defects of the bulwark / deck arrangements. Both the number and percentage are shown.

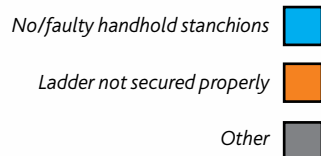
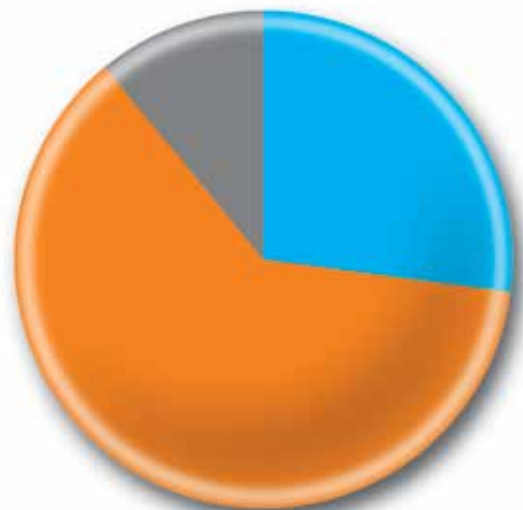
DEFECTS OF PILOT LADDER	TOTAL	AS %
Steps not firmly against ship's hull	45	5.98
Steps not of suitable material	10	1.33
Incorrectly rigged retrieval line	234	31.12
Steps broken	24	3.19
Steps not equally spaced	21	2.79
Climb >9m on pilot ladder	15	1.99
Steps dirty/slippery	22	2.93
Sideropes not of suitable material	27	3.59
Pilot ladder outside mid-ships half length	15	1.99
Steps painted or varnished	10	1.33
Incorrect step fittings	42	5.59
No bulwark ladder	7	0.93
Steps not horizontal	94	12.5
Other	186	24.73

DEFECTS OF PILOT LADDER



DEFECTS OF BULWARK / DECK	TOTAL	AS %
No/faulty handhold stanchions	72	27.17
Ladder not secured properly	164	61.89
Other	29	10.94

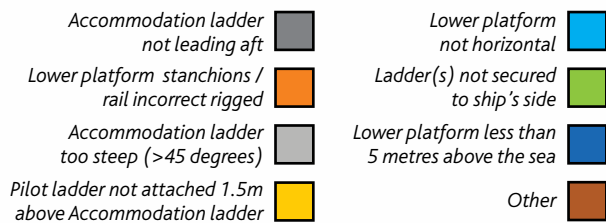
DEFECTS OF BULWARK / DECK



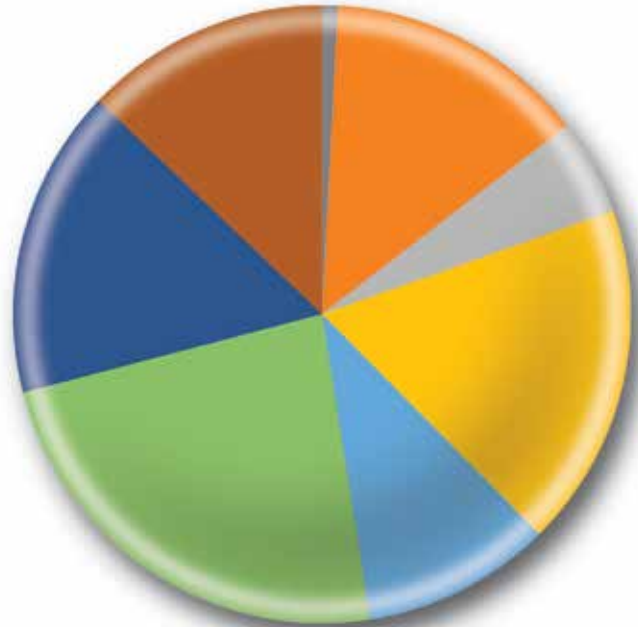
NON-COMPLIANCE BY TYPE OF DEFECT

The first pie chart shows the combination defects. Both the number and percentage are shown. The second pie chart shows the safety equipment defects. Both the number and percentage are shown.

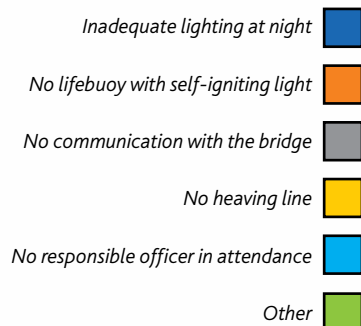
COMBINATION DEFECTS	TOTAL	AS %
Accommodation ladder not leading aft	1	0.58
Lower platform stanchions / rail incorrect rigged	24	13.95
Accommodation ladder too steep (>45 degrees)	9	5.23
Pilot ladder not attached 1.5m above Accommodation ladder	31	18.02
Lower platform not horizontal	17	9.88
Ladder(s) not secured to ship's side	40	23.26
Lower platform less than 5 metres above the sea	28	16.28
Other	22	12.79



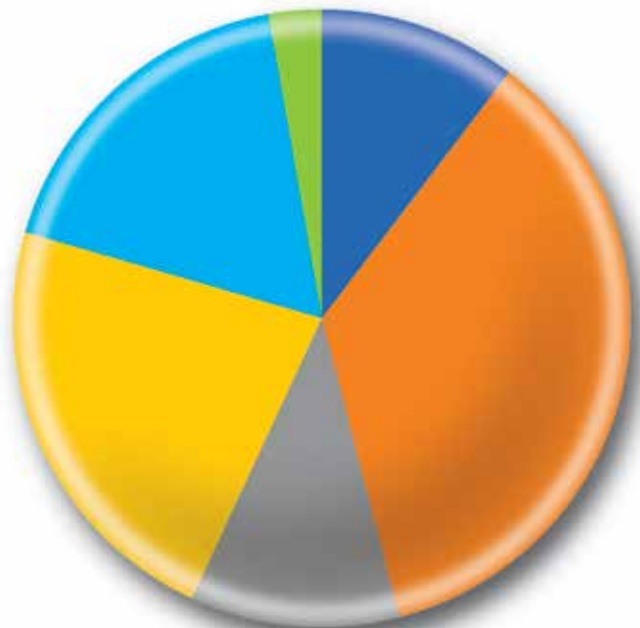
COMBINATION DEFECTS



SAFETY EQUIPMENT DEFECTS	TOTAL	AS %
Inadequate lighting at night	19	10.27
No lifebuoy with self-igniting light	66	35.68
No communication with the bridge	20	10.81
No heaving line	42	22.7
No responsible officer in attendance	33	17.84
Other	5	2.7



SAFETY EQUIPMENT DEFECTS



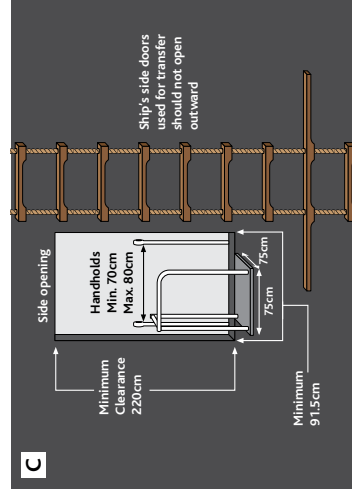
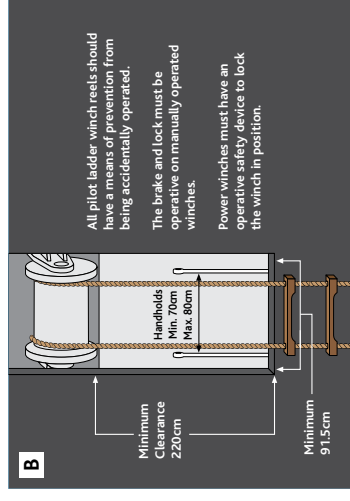
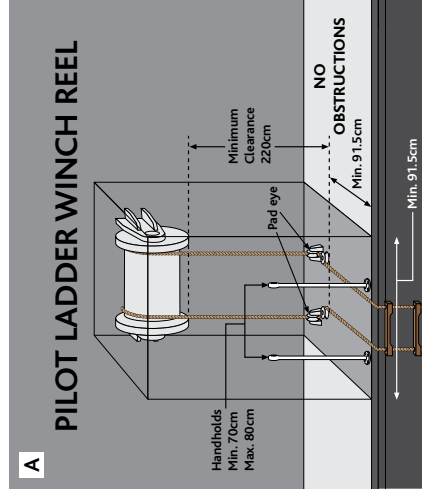
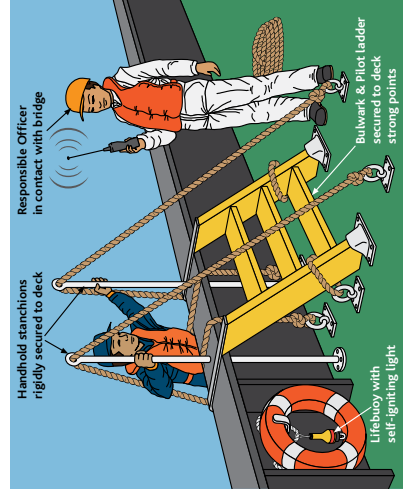
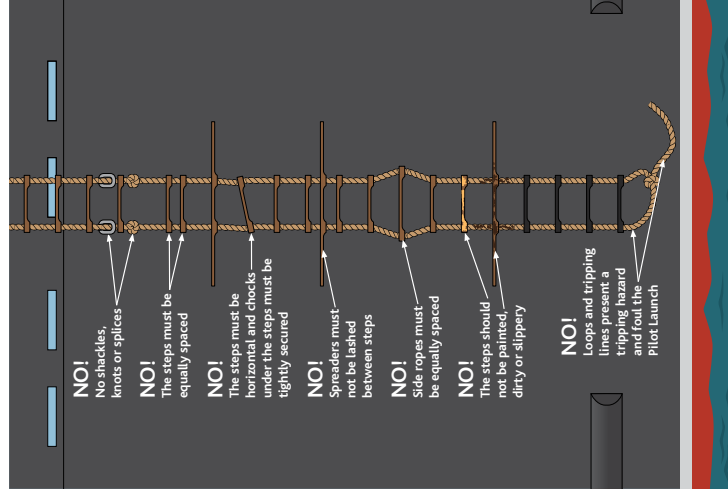
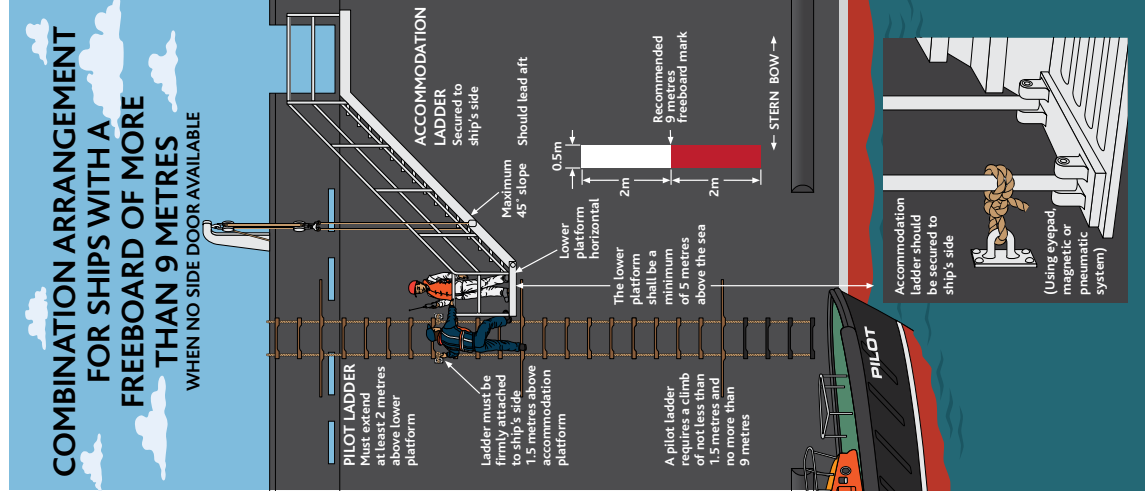
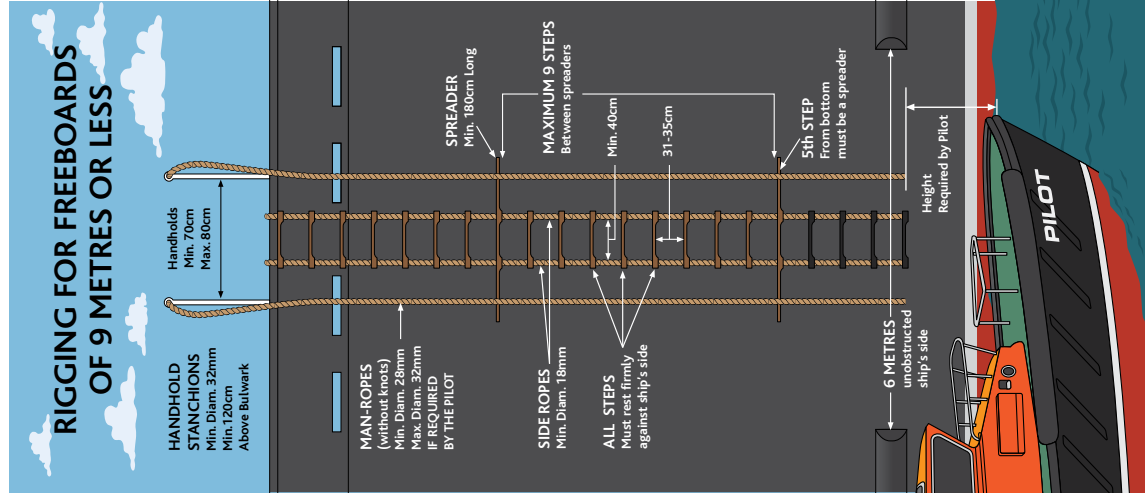
REQUIRED BOARDING ARRANGEMENTS FOR PILOT



In accordance with SOLAS Regulation V/23 & IMO Resolution A.1045(27)

INTERNATIONAL MARITIME PILOTS' ASSOCIATION

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