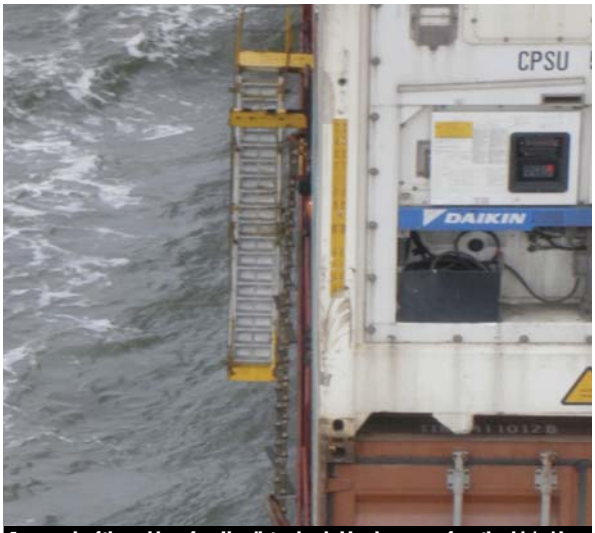
Unsafe pilot ladders can lead to death, injury or ship detention. **Captain KEVIN VALLANCE**, vice-chairman of the UK Marine Pilots' Association technical and training committee, explains how seafarers can help to cut the dangers...

Step up to the mark for pilots



An example of the problems faced by pilots when ladders hang away from the ship's side

Unfortunately, despite the best efforts of the International Maritime Pilots Association (IMPA) and with full cooperation from various regional and national pilot associations, there continue to be far too many reports of poorly rigged or unsafe pilot ladders.

It must be accepted and realised that use of a pilot ladder to transfer between two moving vessels is a potentially high-risk operation which needs to be properly and safely conducted to reduce risks to the lowest possible level.

This will, by necessity, involve the use of a properly constructed and well maintained ladder which is safely rigged in a proper seamanlike manner, with the operation being overseen by a 'responsible officer'.

Unfortunately, on a daily basis worldwide, pilot transfer operations involving the use of a pilot ladder take place which fall below the standards required by the International Maritime Organisation (IMO) and which unnecessarily put pilots at risk of serious or potentially fatal injury.

"If pilots are presented with a poorly maintained ladder, they are duty-bound to report the deficiency"

On one occasion during the early part of 2013 I was met at the top of a pilot ladder by a first-trip cadet with six weeks' sea time. Is that a 'responsible officer'? On another occasion I was met by the security officer of a passenger vessel. Can he be considered to be a 'responsible officer' to oversee the condition and rigging of a pilot ladder?

One important recent legislative change was the 2009 decision that pilot ladders and their associated equipment are considered to be part of the ship's safety equipment. This led to the introduction of mandatory 'Inspection of Pilot transfer arrangements' into the requirements of SOLAS Chapter 1 Part B Regulation 7 (passenger ships) and regulation 8 (cargo ships). This placed a legal requirement on flag states to consider pilot ladders and their associated items of equipment on a regular basis during mandatory SOLAS inspections.

In order for meaningful and reliable inspections to take place it is necessary for each ladder and its associated equipment to be readily identified. Every ladder must have a certificate issued by its manufacturer, and it must be identified by either a tag or another method of permanent marking.

After a considerable period of time IMPA — through lobbying at the IMO and by the presence of a substantial number of serving pilots within national delegations — was successful in getting major revision, leading to a complete rewrite of SOLAS Chapter V Regulation 23, Pilot Transfer Arrangements.

In addition, in May 2012 the IMO's maritime safety committee approved a new 'Required Boarding Arrangements for Pilots' document in conjunction with IMPA. This poster gives a clear and concise guide to all the salient points required to enable the safe rigging and supervision of pilot embarkation and disembarkation.

Within the regulation a clear definition is made regarding the height of pilot ladder a pilot should be asked to climb. The minimum height of climb is stated to be 'not less than 1.5m', and the maximum height of climb is to be 'not more than 9m above the surface of the water'.

However, recognising the vast number of high-sided vessels which now operate with freeboard of greater than 9m, a 'combination arrangement' consisting of the use of pilot ladder in conjunction with an accommodation ladder is permitted.

Although use of a combination ladder is very beneficial in reducing the height of climb to a maximum of 9m, it does unfortunately add another potential obstacle — where the embarking pilot must transfer from the pilot ladder to the accommodation ladder (or vice versa when disembarking). This is particularly hazardous if the pilot ladder and/or the accommodation ladder are hanging freely (not connected to the ship's side). The problem may be further aggravated if the vessel has a list, is operating in strong winds or has not been able to provide an adequate lee course.

The photograph above shows the problem encountered by pilots when trying to make use of combination ladder arrangements where the accommodation ladders are allowed to hang freely away from the ship's side. It can be clearly seen that neither the accommodation ladder nor the pilot ladder are lying flat alongside the vessel's hull.

Where a combination arrangement is used, SOLAS V Regulation 23 states quite clearly: 'The accommodation ladder shall be sited leading aft. When in use, means shall be provided to secure the lower platform of the accommodation ladder to the ship's side, so as to ensure that the lower end of the accommodation ladder and the lower platform are held firmly against the ship's side.'

Furthermore, the regulation goes on to specify '...when a combination arrangement is used for pilot access, means shall be provided to secure the pilot ladder and manropes to the ship's side at a point of nominally 1.5m above the bottom platform of the accommodation ladder'.

The relevant dates of application for the items covered by the SOLAS V regulation are clearly stated within the regulation. They do NOT make reference to vessels being built before or after 1 July 2012, but they do make reference to 'Equipment and arrangements for pilot transfer installation dates'.

If it is logically accepted — and referred to by industry guidelines and in current legislation — that when referring to a combination ladder arrangement, this should include the accommodation ladder and the pilot ladder with its associated equipment. If any part of the arrangement is renewed or replaced, then the whole system becomes a new arrangement and it should under the regulations 'in so far as is reasonable and practicable' be required to comply with the rules for post-July 2012 installation. This includes requiring the accommodation ladder and the pilot ladder to be secured to the ship's side.

Many shipping companies and a number of flag states are continuing to mistakenly read the renewed Regulation 23 and interpret that it is only applicable for vessels built after July 2012. One common reason given for the wish to disregard the spirit of the regulation is the perceived difficulty for the ship's staff to secure the lower platform of the accommodation ladder to the ship's side. Unfortunately there have been occasions where ship's crew have been fatally injured during the operation of rigging pilot ladders. It must be stressed that each rigging of a pilot ladder arrangement must involve the completion of a risk assessment to ensure that it is safe, for both the pilot and the ship's crew.

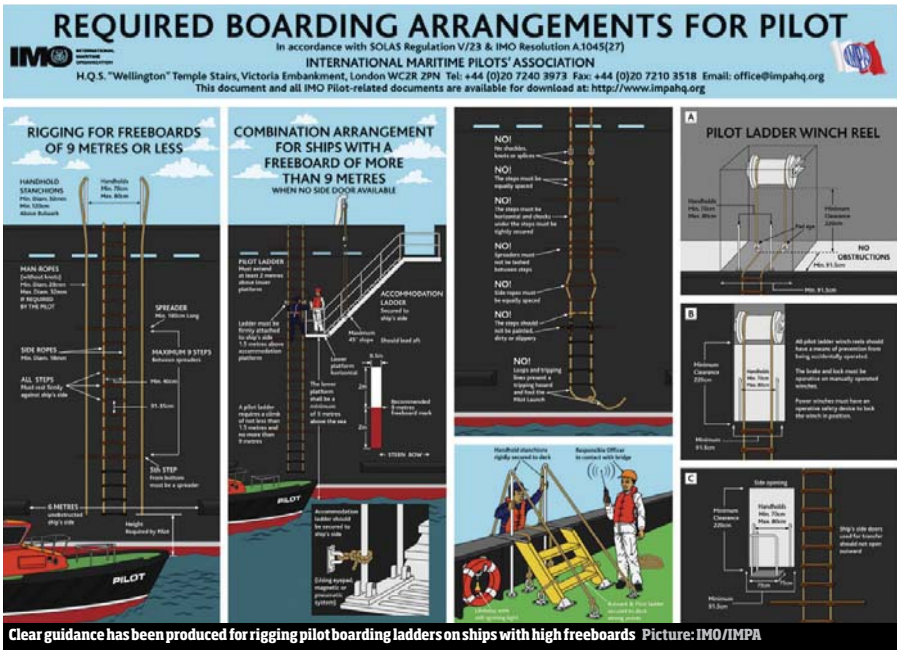
There are available a number of inexpensive pieces of commercially-produced equipment which have been developed to enable both the accommodation ladder and pilot ladder (and its manropes) to be safely secured to the ship's side. These specially-designed securing arrangements have integral magnetic or hydraulic systems to attach to the ship's side. These then provide an independent lashing point for making fast the accommodation ladder, the pilot ladder and manropes.

Portable securing devices give a great advantage over the previous arrangements, where one option was the use of inset securing points which had to be built into the ship's hull. Their ease of use means they are particularly useful for large tanker or bulk vessels, since ladder securing arrangements can be easily rigged at various heights to allow for the different conditions of draft and trim encountered for loaded, partially loaded or ballast conditions. Because the units are not fixed, the vessel's hull remains free of hull protrusions which could foul locks, berths or associated fenders.

It must be appreciated that pilots have to take responsibility for their own and their colleagues' safety. If pilots are presented with a poorly constructed or poorly maintained ladder, or if the arrangement is not correctly rigged, they are duty-bound to report this deficiency to the proper authorities and, importantly, are not required to use the presented illegal access installation.

For a pilot who is given a ladder with a climb of more than 9m, this should be considered a reportable incident. If, subsequently, the vessel cannot demonstrate its ability to rig a compliant pilot transfer arrangement it will be considered to be in breach of the SOLAS Convention and may be subject to detention until the defect is rectified. In addition, delay to the ship will be incurred whilst immediate arrangements are made by the ship's staff to enable compliant arrangements to be made.

It is only when all parties involved in the embarkation and disembarkation of pilots are fully committed to complying with pilot transfer regulations (and the intended spirit) that the potential risks can be identified and reduced to the minimum possible.



Clear guidance has been produced for rigging pilot boarding ladders on ships with high freeboards Picture: IMO/IMPA