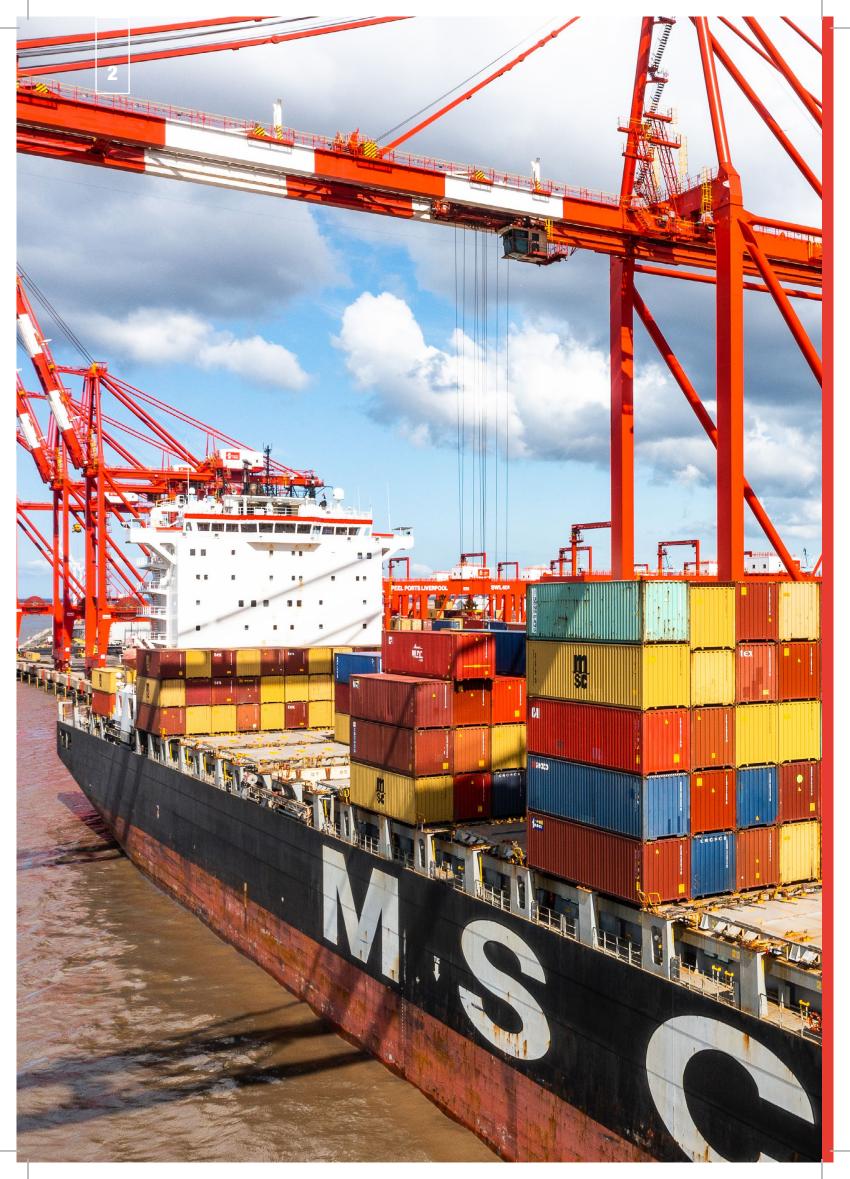


# THE EMBARKATION & DISEMBARKATION OF PILOTS

Peel ports adaptation of the code of safe practice.

# **CODE OF SAFE PRACTICE**

Revised July 2021 | Next Review due Spring 2024



# **CONTENTS**

調

Introduction	5
Disclaimer	7
Note	7
1. The pilot boat	8
2. Leaving the berth	9
3. Pilot boarding areas	11
4. On approaching the ship	12
5. The ship	16
6. Pilot embarkation operation	18
7. Low freeboard ships	20
8. Pilot disembarkation operation	21
9. Reporting of defective or non-compliant pilot Boarding arrangements	22
10. Leaving the ship's side	24
11. Heavy weather operations	24
12. Restricted visibility	24
13. Man overboard procedures	26
14. Training for pilot boat operations and retrieval of Casualties	28
15. Transfer operations involving non-regular ships	29
16. Pilot transfer by helicopter	29
Annex 1	30
Annex 2	31
Annex 3	32
References	33



# **INTRODUCTION**

Peel Ports is committed to ensuring all personnel go home safely at the end of the day. We are committed to ensure we work safely and that personnel carry out activates without endangering themselves or others. To do this, it is recognised that personnel require the correct training, so they can identify the Hazards, evaluate the risks and us the appropriate precautions to carry out the operation.

The act of boarding & disembarking vessels at sea by transfer from one vessel to another is inherently dangerous and starts from the moment personnel step onto the transfer boat until they are safely aboard or returned ashore.

All Personnel need to be vigilant throughout this operation and have completed the mandatory training and familiarisation requirements as laid out in the Group Training Matrix before they embark on the transfer vessel or an outbound ship. (special circumstances will be individually risk assessed and exception to this may come from the Group Harbour Master as the statutory Harbour Master).

This Policy applies to all personnel involved in any Peel Ports boarding operations, irrespective of impetrative.

The Peel Ports, Boarding and Landing Code of Safe Practice, is an adaptation of THE EMBARKATION & DISEMBARKATION OF PILOTS CODE OF SAFE PRACTICE; a document prepared jointly by the Marine/Pilotage Working Group of the British Ports Association (BPA) and the UK Major Ports Group (UKMPG) and the Technical & Training Committee of the United Kingdom Maritime Pilots Association (UKMPA).

Where appropriate, additions (in red Italics) have been added to this document to meet the specific conditions encountered at our ports.

The UKMPA code is designed to assist Competent Harbour Authority (CHA's) and pilot organisations, to establish safe operating procedures for all pilot boarding and landing operations, derived by risk assessment.

This 2021 revised edition of the Code of Safe Practice for the Embarkation and Disembarkation of Pilots is considered to be essential reading for all those involved in the Pilotage Service.

The transfer of a Pilot between pilot boat and ship presents significant risks that need to be carefully managed. This Code gives guidance to improve the control of these risks.



This document is produced by Peel Ports as the basis for establishing safe operating procedures for boarding and landing operations across the group which should be underpinned by appropriate and thorough risk assessment. This Code will assist Peel Ports in establishing safe operating procedures which are specific to each area of operation and which are to be derived by appropriate risk assessment. Operational procedures are to be developed locally at each port under the policies within this document, the local procedures will be developed following risk assessment.

This version of the Code has been prepared jointly by the United Kingdom Maritime Pilots Association (UKMPA) Technical and Training Committee, the UK Harbour Masters' Association (UKHMA), Port Skills and Safety and the BPA/UKMPG Marine Pilotage Working Group.

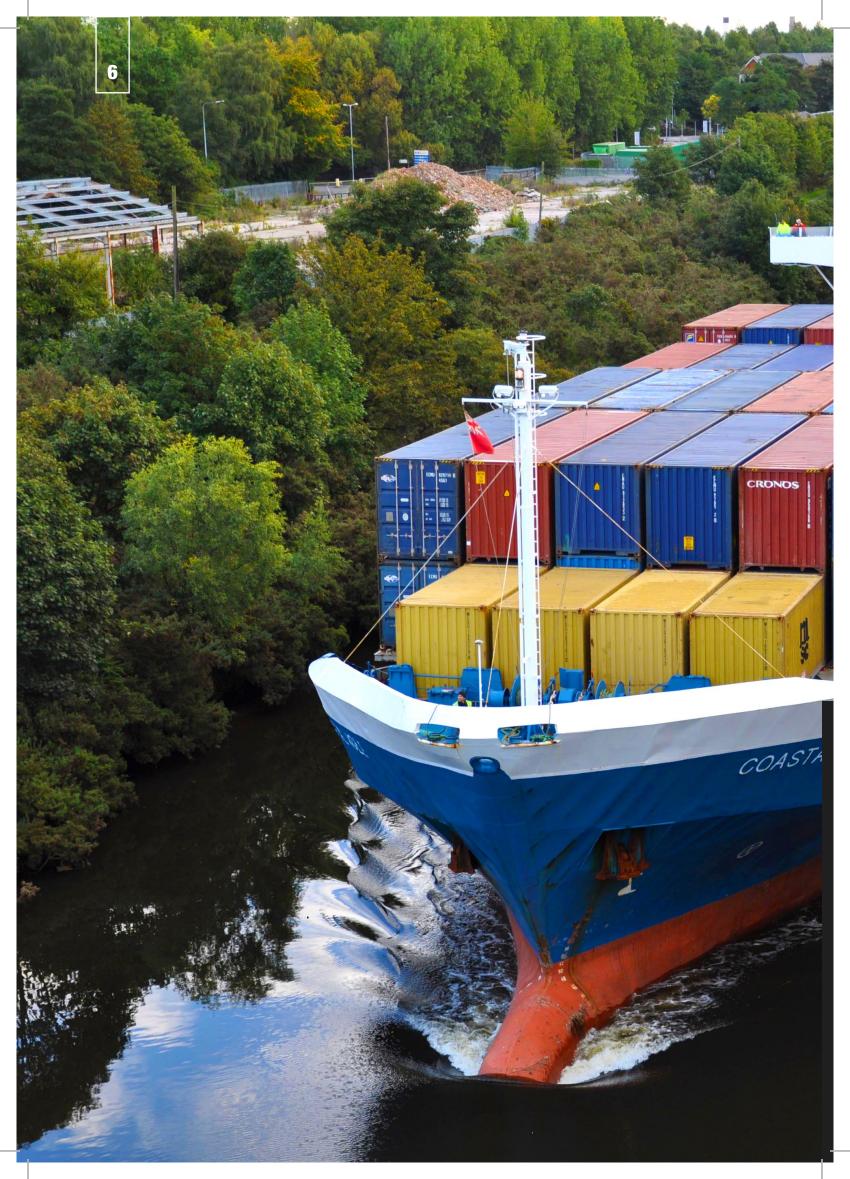
The Code recognises IMO conventions, SOLAS regulations and United Kingdom legislation and has been linked in the Port Marine Safety Code, Guide to Good Practice. A list of relevant documents is included at the back of the Code, along with further information on Personal Protective Equipment (PPE) which gives guidance on correct use and self-checks to be carried out on lifejackets and lifesaving equipment.

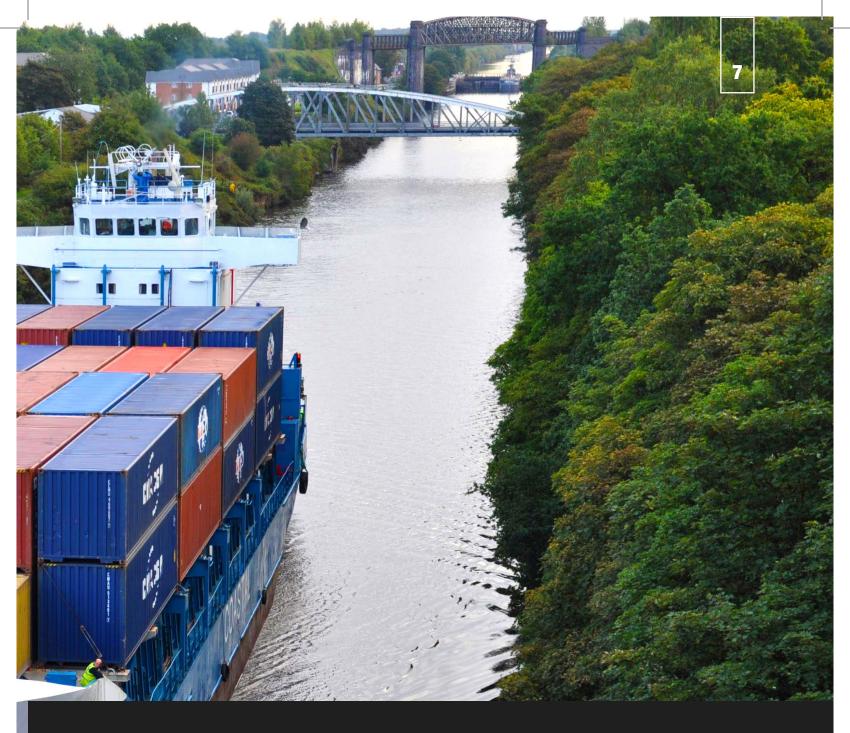
The Code acts as a guide to safe practice for all those involved in all Pilot transfer operations. It not only covers the act of transfer from pilot boat to ship and vice versa but also addresses issues such as the pilot boat itself, boarding and landing areas, training and use of PPE.

#### July 2021

This Document supersedes the 2021 revised edition of the Code of Safe Practice for the Embarkation and Disembarkation of Pilots and is considered to be essential reading for all those involved in the delivery of the Pilotage Service.

#### January 2023





### DISCLAIMER

# Modifications and additions to cater for Peel Ports particular circumstances have been derived from consultation across the Peel Port pilot service stakeholders.

This guidance has been produced jointly by the British Ports Association, the United Kingdom Maritime Pilots Association, the UK Harbour Masters' Association, the UK Major Ports Group, and Port Skills and Safety ("the Five Associations") to assist CHAs and pilot organisations in establishing safe operating procedures for pilot boarding and landing operations and while reasonable care has been taken by the Five Associations in its production the Five Associations do not accept any responsibility or liability (individually or jointly) for any action taken or not taken in reliance on the guidance or for the use of the guidance by any person. The Five Associations shall not be liable to any person for any loss or damage howsoever arising from the use of this guidance. This disclaimer is not intended to limit or exclude liability for death or personal injury caused by negligence on the part of the Five Associations or any matter that it would be unlawful for the Five Associations to exclude or limit liability.

# NOTE

Regulations, instruments, and guidance referred to in this document are correct at the time of publishing. However, such material may be amended from time to time and the reader should always seek the current version.

## **1. THE PILOT BOAT**

- 1.1 As the Competent Harbour Authority (CHA) we must ensure that the pilot boat/boats in ourservice meet the relevant requirements of:
  - a) Merchant Shipping (Small Workboats and Pilot Boats Regulations 1998 (SI 1998 No.1609), as amended
  - b) The Small Commercial Vessel Code Maritime & Coastguard Agency (MCA)
  - c) Small Vessels in Commercial Use for Sport or Pleasure, Workboats and Pilot Boats
  - d) Alternative Construction Standards (SCV Code) Marine Guidance Note (MGN) 280(M)
  - e) Manning of Pilot Boats MGN 50(M)
  - f) The Port Marine Safety Code
  - g) The Guide to Good Practice on Port Marine Operations
  - h) A Small Workboat engaged as a pilot boat from time to time, should comply with the Workboat Code as it applies to its duties as a Small Workboat and, in addition, comply with the requirements for a dedicated pilot boat for which the vessel's workboat certificate should be appropriately endorsed.
- 1.2 All Pilots and pilot boat crew should receive initial training and familiarisation with regard to the position, stowage and operation of all safety equipment aboard each pilot boat they use, as per the vessel safety plan, which is recommended to be used. This initial training and familiarisation should take the form of a Safety Brief. It should cover all safety aspects. The coxswain must also ensure that all other passengers receive a safety brief highlighting the position, stowage and operation of all safety equipment.
- 1.3 Prior to leaving the berth, and at least once per watch, the pilot boat coxswain should ensure that their boats are in all respects ready for sea. All openings e.g. hatches, access to belowdeck spaces and the engine rooms should be closed when underway at sea.

# It is recommended that each CHA develops a set of Pre-Sea Checks to be done by crew before sailing, or at least once per day depending on the frequency of operations.

A planned regime of maintenance and inspections should be in place to ensure all launches are kept in good working order. It should cover maintenance of the hull, propulsion machinery and controls, auxiliary systems and controls, electronics and power generation, navigational and communications equipment, domestic equipment, lifesaving and firefighting equipment. The planned maintenance system should also include a robust defect reporting and rectification process, a routine survey procedure to ensure compliance with the relevant regulation, and a critical equipment policy to identify equipment, the failure of which could seriously endanger personnel or the environment. Hatches and access should be clearly marked accordingly and identifying when they should be left closed or open, apart from when access is required.

1.4 Prior to leaving a berth, the coxswain and crew should familiarise themselves with the position and stowage of the safety equipment fitted to that particular pilot boat.

They should use the Vessel Safety Plan routinely to familiarise and check the position, stowage and condition of lifesaving and firefighting equipment

The Safety Brief should make use of a unique Vessel Safety Plan which is to be clearly displayed on each vessel. The Vessel Safety Plan should include information about the provision and location of all lifesaving and firefighting equipment and should summarise the crew's actions in the event of an emergency and what is expected of passengers

1.5 On joining in harbour or at sea, the Pilots should familiarise themselves with the position and stowage of the safety equipment fitted to that pilot boat.

This should be done by means of the vessel Safety Plan that is clearly available on the launch.

- 1.6 Where reasonably practicable, arrangements should be made for the mooring ropes of pilot boats to remain at the berth when the boat is at sea. Any additional ropes, not left ashore, should be properly stowed in a safe location so that they cannot foul the propellers if they go overboard or present a tripping hazard.
- 1.7 The decks of the pilot boat should be clear of all unnecessary obstructions allowing clear passage and movement for the Pilot and crew. Where deck lighting is fitted, it should be tested in accordance with the CHA's vessels' Pre-sea Check procedures.
- 1.8 An up-to-date and accurate log should be maintained on board each pilot boat. Entries should include details of all periodic safety and equipment checks, drills and defects.

1.9 Pilots should not hinder the coxswain in the navigation of the pilot boat, for example by impeding their view of the radar, AIS, and/ or the use of the pilot boat's VHF. This is particularly important in conditions of reduced visibility. The deckhand has the primary role as lookout and in order to carry out this function should occupy the vacant front seat. Pilots and passengers should not act in such a way that impedes the crews concentration, including distracting conversation or actions. The deckhand should be trained and competent at the wheel of the launch in the event of the coxswain becoming ill and unable to take the helm. This training can be in house and launch specific.

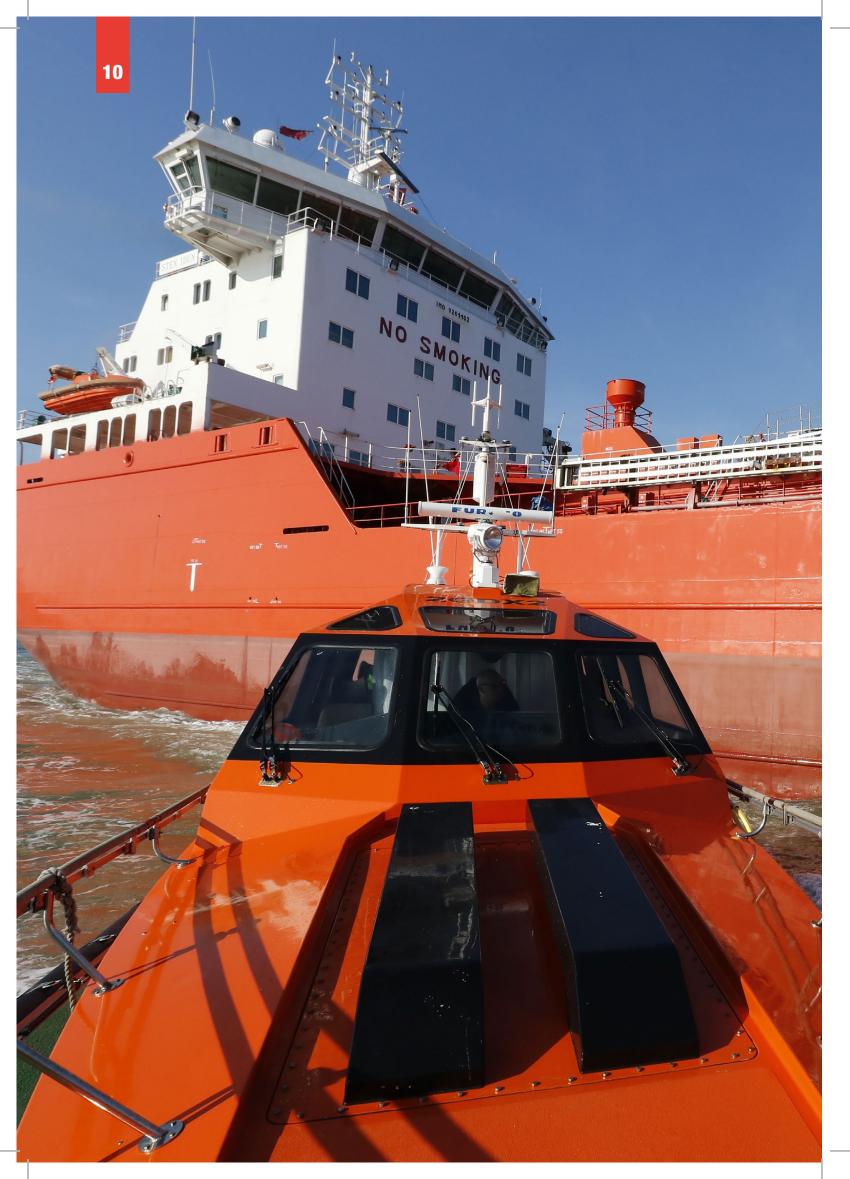
1.10 When circumstances require, coxswains should not hesitate to ask the Pilot for advice or for assistance in order to reduce their operational workload.

## **2. LEAVING THE BERTH**

- 2.1 The pilot boat should not leave a berth unless it is, in all respects, ready for sea; the crew having completed Pre-Sea Checks, and Critical Systems and Equipment are free from defect.
- 2.2 The pilot boat should be manned in compliance with MGN 50 (M).
- 2.3 The pilot boat should not operate outside the terms of its MCA Pilot Boat Certificate, (PB1), which should be clearly displayed on board.
- 2.4 CHA's should have procedures in place, to ensure that at any time, the location and numbers of persons on board the pilot boat are known. On leaving the berth, the launch should call VTS/LPS on the VHF to inform of their intended passage and the total number of Persons on Board, and when Pilots board from outbound Ships or disembark to inbound ships.
- 2.5 Where reasonably practicable, the position of the Pilot boat should be monitored from ashore. This is especially important in heavy weather and restricted visibility
- 2.6 Pilots and passengers should be made aware of the potential dangers associated with wearing auto inflating lifejackets within the pilot boat and the associated difficulties that would arise in a capsize / flooding situation See Annex 2.

Pilots Must wear the PPE in line with the specification stipulated by the CHA which has been developed by consultation and risk assessment with pilots, crews and marine stakeholders.





# **3. PILOT BOARDING AREAS**

- 3.1 The CHA have a responsibility to identify and evaluate areas for the safe boarding and landing of Pilots. The following should include, but not be limited to:
  - a) Sea Room for the manoeuvre
  - b) Depth of water
  - c) Shelter

- d) Seabed gradient
- e) Traffic and communication
- f) Proximity of traffic and potential wash
- 3.2 Charted boarding locations provide general guidance for arriving vessels and may be varied as required in order to provide the safest place for a Pilot transfer in the prevailing conditions.

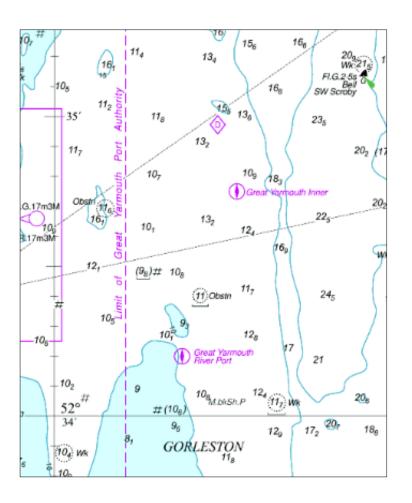
The boarding area should be decided following a formal Navigational risk assessment and be in an area where enough sea room is available for manoeuvring away from the compulsory Pilotage area for any reason during the boarding operation or giving the ability to abort an inward passage once the pilot takes the conduct, should the need arise.

3.3 Dynamic and formal risk assessments should be undertaken to identify environmental limits of boarding and landing operations. A framework of safe operational limits may be published, to enable operational staff and port stakeholders, to be aware of weather conditions likely to delay or suspend pilot transfer operations.

In assessing such a framework, where established, consideration should be given to

- a) Wind speed and direction anemometers
- b) Wave rider buoys or equivalent, to determine wave height
- c) Local meteorological forecasting services or apps
- d) Record keeping of weather conditions, by boat crews.

In marginal conditions the pilot boat crew, in conjunction with the Pilot, should make a dynamic assessment of the conditions at the boarding area, before confirming it is safe to commence or continue boarding and landing operations.



# 4. ON APPROACHING THE SHIP

- 4.1 CHAs should establish reporting procedures, whereby VHF radio contact is established between the pilot boat and ship (or VTS as appropriate) on the specified channel published in the Sailing Directions.
- 4.2 The coxswain of the pilot boat should establish the position of the ship to be served and where there is more than one ship in the vicinity, should establish the relative positions and expected movement of all vessels in the area.
- 4.3 Before a pilot transfer operation and after consultation with the Pilot involved, the pilot boat coxswain, or VTS should advise the ship to be served:
  - a) Advise VTS or onshore monitoring site as to the intended boarding/landing plan when on station.
  - b) The side for the pilot ladder and height above the water
  - c) Type of ladder, appropriate to the freeboard
  - d) Recommended course and speed to provide an appropriate lee. Particular care and attention should be paid in recommending a course and speed that avoids the pilot boat boarding in following sea and swell with the potential to broach.
  - e) Sequence number where more than one ship is to be served
  - f) When transferring more than one Pilot, the total number to be communicated between ship and pilot boat.
  - g) Any additional requirements, such as heaving lines or removal of man ropes
  - Masters should be asked to confirm that the pilot ladder is rigged in accordance with current IMO regulations; Convention for Safety of Life at Sea (SOLAS) Regulation V/23 and IMO resolution A 1045 (27) as amended.

A Verbal declaration MUST be made by the ship to the Port VTS/LPS that the Pilot boarding arrangements are within certification and rigged as per SOLAS regulation 23 and IMO resolution a1045(27) requirements. Ship operators have been made aware by a Notice to Mariners that Pilots operating within Peel Ports CHAs will refuse to embark / disembark via non-compliant boarding arrangements resulting in the ship being directed to safe anchorage or holding position until a suitable pilot ladder can be provided.

- i) The assisting pilot boat deck hand should visually inspect the condition of the ship's boarding arrangements including if it is safe to do so, placing weight onto the bottom of the ladder (while hooked on)
- j) For ships with a freeboard of more than 9m, when no side door is available a combination arrangement is required.
- k) The traffic in the vicinity and risks associated with interaction with these vessels should be considered.

The Pilot should ascertain that the embarkation area on the ship is free from obstructions, the coxswain should establish this when speaking to the vessel. This should apply even if a ladder is not required.

- 4.4 On approaching a ship from a near head-on position on the same side as the pilot ladder is rigged, care must be taken to ensure the wash created by the pilot boat does not interfere with the safe boarding or landing operation. This may require the pilot boat to remain clear of the pilot ladder until the wash created has cleared down the ship's side. Consideration should be given to passing down the opposite side and approaching the ladder from aft, in order to minimise the effect of the pilot boat's own wash on the transfer operation.
- 4.5 Particular caution should be taken when serving a ship at anchor, which is unable to manoeuvre to make a lee, particularly at slack water. The ship may need to be underway and making sufficient way so that the pilot boat can maintain position alongside the vessel before a Pilot transfer operation.
- 4.6 During the approach to the ship, both the Pilot and assisting deck hand should remain in the wheelhouse of the pilot boat until it is settled at reduced speed, in the lee of the vessel.

The deckhand and Pilot should usually leave the wheelhouse and proceed to the boarding location together. Some CHAs may permit Pilots to proceed along the outboard deck of the launch alone to account for specific local operational reasons and conditions which will have been identified by risk assessment, The deckhand MUST be clipped on to the Hadrian's rail and be there to assist the Pilot.

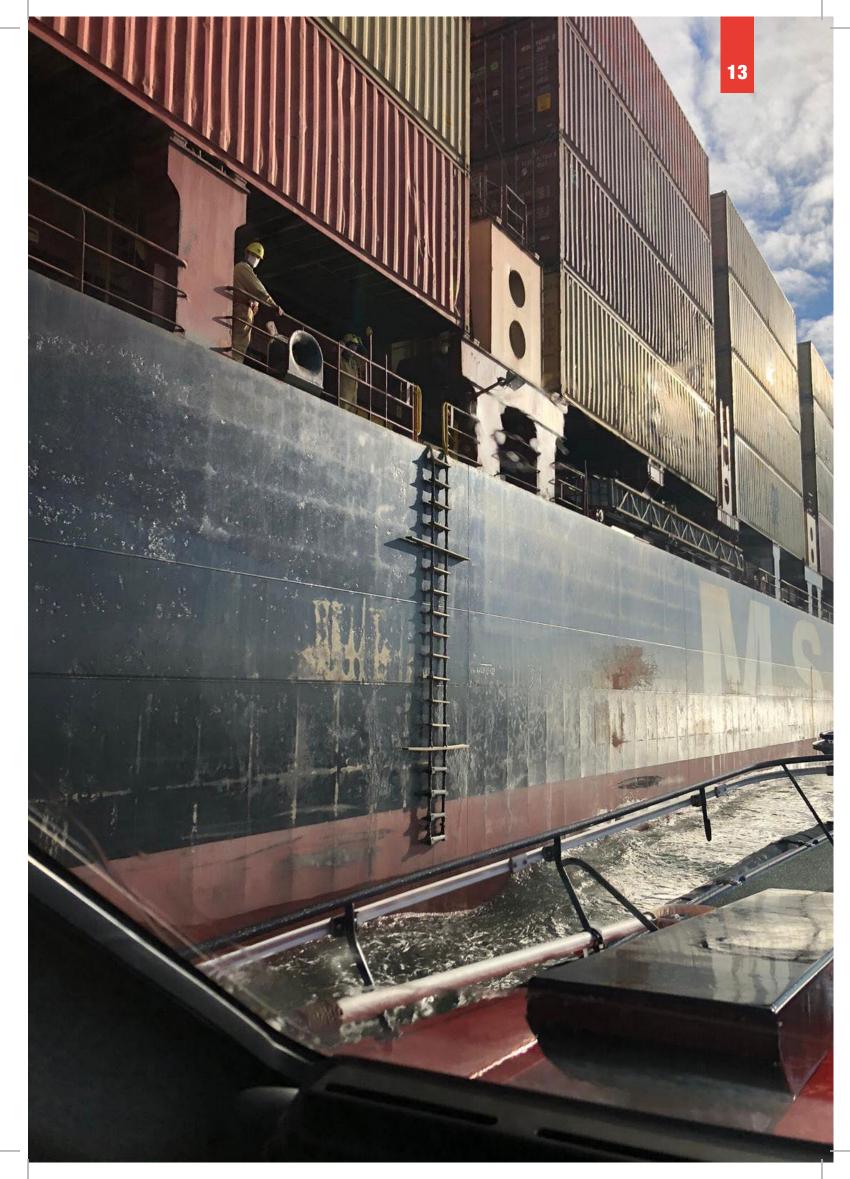
The decision of whether Pilots should use the Hadrian's Rail or not will be determined by the local CHA, but must be done by risk assessment in consultation with all Pilot boarding stakeholders and they must be very clear as to the reasons for their decisions.

As a minimum the Pilots must be trained in the whole boarding/landing procedure including transiting from the wheel house to the foredeck with and without Hadrian's rail, and they must be part of the risk assessment and be in full recognition of all of the potential hazards.

Means of connecting to the Hadrian's rail should always be made available to all those going onto the deck.

4.7 At night the pilot boat deck should be illuminated before anyone goes on deck.

Local risk assessments conducted by the CHA in consultation with all Pilot transfer stakeholder will be used to determine whether both the Pilot and deckhand need to be clipped on to the Hadrian's rail during night transfers.



# 4. ON APPROACHING THE SHIP CONTINUED...

- 4.8 At night, during the final approach, the pilot boat searchlight should be turned on to assess the sea conditions, illuminate the pilot ladder and the foredeck of the pilot boat. Care must be taken not to dazzle personnel on deck, or adversely affect the night vision of persons on the bridge, or on the deck of the ship to be served.
- 4.9 The decision to place the pilot boat alongside the vessel to be served should ultimately be the responsibility of the coxswain. The Coxswain should take into consideration factors including but not limited to: adverse weather conditions, traffic density, any vessel obstructions or side overhangs, or wash when assessing the risk to personnel and/or the launch by coming alongside.

The authority of the coxswain to make this decision is supported by the Group Harbour Master (GHM).

The Coxswain should be in no doubt that if he/she or any personnel on board feel that it is unsafe to place the launch alongside another vessel, then the Coxswain has ultimate authority to abort the boarding/landing. The Coxswain shall make the decision but with the input of the Pilot and deck hand.

- 4.10 If there is any doubt at any time about the condition or compliance of the ladder arrangement in accordance with SOLAS requirements or safety of the transfer operation, the Pilot should not board or land.
- 4.11 All non-compliant or (potentially) unsafe ladders and boarding arrangements and any nearmiss incident associated with the transfer operation, must be reported to the CHA and MCA as soon as it is safe to do so (see section 9).

Under MSN 1832 (M), and the 1987 Pilotage Act, section 18(2) pilots are legally obligated to report dangerous situations they encounter in carrying out their duties. Therefore, any Pilots within Peel Ports CHA/SHA who encounter non-compliant boarding arrangements are required to notify the Competent Harbour Authority who will notify the MCA. This may result in a Port State Control or Flag State inspection

The means by which Pilots shall report non-compliances shall be in the first instance by immediate VHF call from the launch to VTS/LPS, and then a following call or email to the CHA from the Pilot. Reports shall be backed up by pictures where possible as they may be used as evidence in a vessel prosecution.

The UKMPA Pilot App is now available for download and use on the Google Play Store for Android and on the App Store for Apple. All Peel Ports locations are available on the app. It is hoped that the introduction of the App will simplify the process of reporting non-compliant ladders and aid to the ongoing improvement in this area of concern and additionally unlock a new area of connecting and keeping in touch with UKMPA issues and developments.

The CHA will refuse Pilotage service to the vessel until the defect has been rectified and verified by a Pilot. Launch crew are also expected to report boarding arrangement non-compliances if they identify issues not already identified by the Pilot.

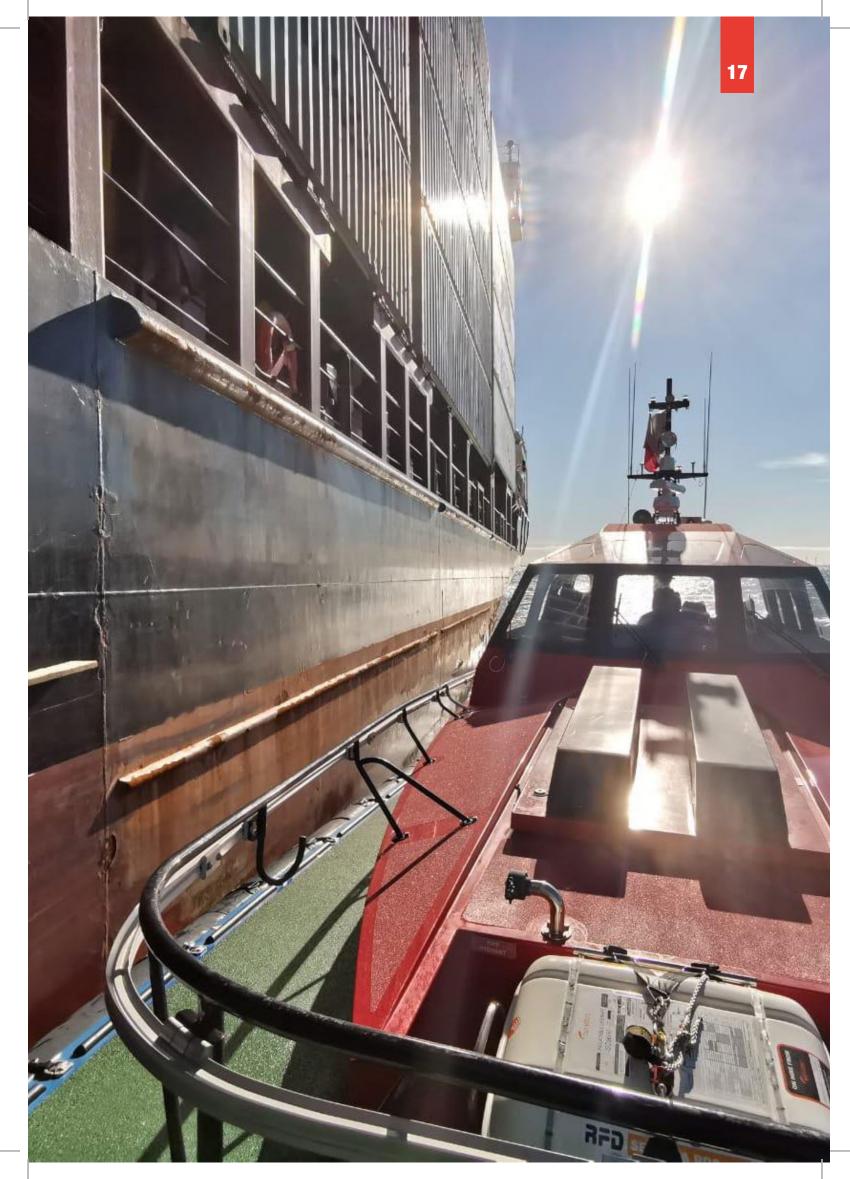
CHA's, Pilots, launch crew and marine managers should be in no doubt that the decision to refuse provision of pilotage services to a vessel on the grounds of non-compliance or defects shall be supported by the CHA and the Duty Holder.

- 4.12 Whilst undertaking the transfer operation, the pilot boat radar should be placed in standby mode, unless due to the prevailing conditions it would impact the navigational and situational awareness (see section 12.3 regarding restricted visibility).
- 4.13 During restricted visibility, it is recommended that whenever possible, a ship to be served is approached around its stern and not across the bow. CHAs should ensure that coxswains are fully familiar with the requirements of the collision regulations governing navigation in restricted visibility.



# **5. THE SHIP**

- 5.1 Ships have a duty to rig their pilot ladders in accordance with The International Convention for Safety of Life at Sea (SOLAS) Regulation V/23 and IMO resolution A 1045(27) as amended. A copy of the poster showing IMO requirements and IMPA recommendations – "Required Boarding Arrangements for PILOT" is included in Annex 1 to this Code. Local requirements relating to the ship's side required and height above the water should be passed via radio prior to the ship's arrival.
- 5.2 Pilot transfer operations should not be undertaken on ships that do not fully comply with transfer arrangements as referred to in section 5.1 above. *Unless there has been prior consultation with the CHA*. It is the responsibility of the vessel to ensure a safe working environment is provided for the Pilot once embarked.
- 5.3 The pilot ladder should be rigged and secured at the appropriate pilot boarding position on the ship's side or at the side door if fitted. This should be as near amidships as possible and on the parallel body of the ship, clear of all discharges.
- 5.4 In order to allow the ladder to sit flush against the ship's side a list should be avoided. If a list cannot be avoided, the ladder should be rigged on the side which will allow it to remain flush against the side of the ship.
- 5.5 During Pilot transfer, the responsible officer, should be in direct contact with the bridge. This should normally be by radio.
- 5.6 During the transfer, the ship should maintain adequate steerage at the speed requested by the pilot boat coxswain. Turning propellers are a potentially life-threatening hazard to persons involved in transfer operations.
- 5.7 During a Pilot transfer operation, a ship should not be stopped in the water, or its engines put astern, except in an emergency or when requested by the pilot boat coxswain.
- 5.8 When transferring a pilot with a combination arrangement, the accommodation ladder must always lead aft.
- 5.9 The accommodation ladder must be rigged at a height to allow the pilot boat to lie alongside the pilot ladder section, with sufficient allowance for swell, such that no part of the pilot boat can contact the accommodation ladder. The lower platform of the accommodation ladder shall be a minimum of 5 metres above sea level.
- 5.10 When using a combination arrangement, the accommodation ladder should be secured to the ship's side. The pilot ladder must be firmly attached to the ship's side 1.5m above the accommodation platform. It is the vessel's responsibility to ensure that the means of securing the ladder is suitable and fit for purpose.



# **6. PILOT EMBARKATION OPERATION**

- 6.1 The decision to put a pilot boat alongside a ship is the responsibility of the pilot boat coxswain (see section 4.9). In all cases, the decision to board the ship is the responsibility of the Pilot involved. In making the decision, the pilot should take into consideration factors including but not limited to:
  - a) Environmental conditions,
  - b) Physical capabilities of the Pilot
  - c) Suitability of boarding arrangements
  - d) Conduct and condition of the vessel
- 6.2 When on deck both the deckhand and the Pilot must wear appropriate PPE as required and approved by the CHA and worn in accordance with manufacturer's instructions.
- 6.3 It is strongly recommended that Whilst on deck the deckhand must be secured to the pilot boat by an approved method, that does not restrict their freedom of movement. This should also be made available to the Pilot.

As Per 4.6

The decision of whether Pilots should use the Hadrian's Rail or not will be determined by the local CHA, but must be done by risk assessment in consultation with all Pilot boarding stakeholders and they must be very clear as to the reasons for their decisions.

It is recognised that the decision on whether Pilots' will a Hadrian's rail or not will depend on a number of local factors including but not limited to weather and sea state, vessel layout, type of vessel to be boarded and a risk assessment on the use of Hadrian's rail as part of the boarding and landing process.

However, as a minimum the Pilots must be trained in the whole boarding/landing procedure including transiting from the wheel house to the foredeck with and without Hadrian's rail, and they must be part of the risk assessment and be in full recognition of all of the potential hazards.

Any authorised pax onboard the pilot launch must be secured to the Hadrians rail when outside the wheelhouse.

- 6.4 Provided that the ladder has been rigged at the correct height, the deckhand should proceed forward, using the safest route (normally the outboard side). Some CHAs have a practice of requiring the lower steps of the ladder to be brought on board the pilot boat to avoid the risk of the ladder becoming strained should the boat pin it to the ship's side. This practice is not without risk and is not practised universally. CHAs should undertake their own risk assessments and decide upon their own control measures to deal with this risk.
- 6.5 In considering the safest route from cabin to the ladder, the following should be taken into account:
  - a) The width of the deck.
  - b) The location and usability of the safety rail.
  - c) If the inboard route is taken, the likelihood of the boat rolling against the side of the ship, restricting the area between the deckhouse of the pilot boat and the flat of the ship side. The safest route is to use the outboard side of the pilot boat unless specific port risk assessments can safely mitigate the inboard route due to vessel design.
  - d) The exposure to the elements especially when a good lee is not possible, or there is passing traffic if the outside route is used.
  - e) The heel of the pilot boat during transfer.
  - f) The proposed transfer location on the side deck.
  - g) The ability of the coxswain to view the transfer operation.

Pilot and Deckhand should always pass down the outside of the Boat to eliminate the possibility of being crushed between Ship and Boat.

- 6.6 When a retrieval line is considered necessary to ensure the safe rigging of a pilot ladder, the line should be fastened at or above the last spreader step and should lead forward. The retrieval line should not hinder the Pilot nor obstruct the safe approach of the pilot boat.
- 6.7 Where the ladder's height needs adjusting, the coxswain should inform the ship. The Pilot and deckhand should be recalled to the wheelhouse whilst the ladder is being adjusted. The transfer should not be resumed until receiving confirmation the ladder is secure at the correct height.
- 6.8 In adverse weather conditions the risk associated with boarding operations are heightened.
- 6.9 Neither the Pilot nor the deckhand should proceed from the cabin until the pilot boat is in the lee of the ship and the decision to proceed with the transfer has been made by the coxswain.
- 6.10 Before stepping on the ladder, the Pilot should establish that it is properly secured in accordance with SOLAS Regulation V/23 and IMO Res 1045 (27) as amended, by communication with the officer at the top of the ladder. If the top of the pilot ladder is unattended, the Pilot should not attempt to embark.

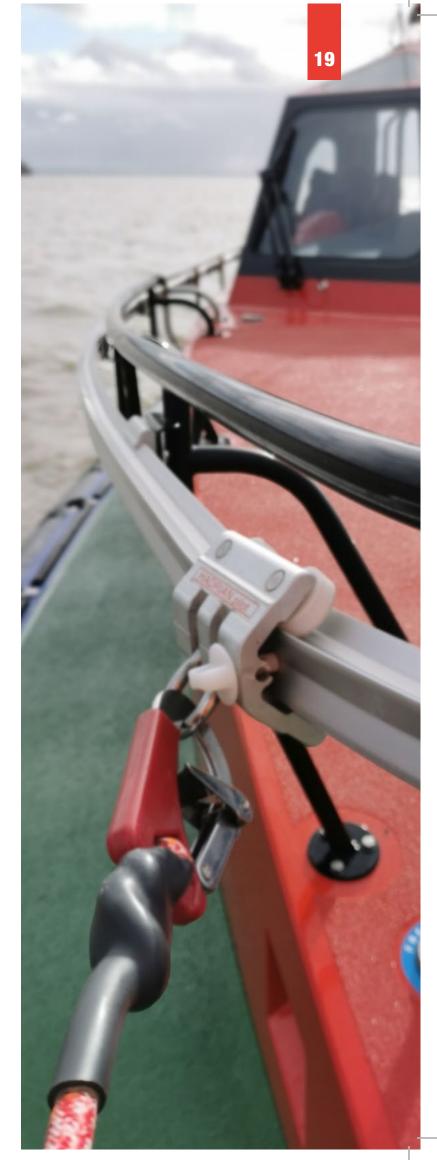
6.11 The timing of stepping from the pilot boat to the ladder requires the use of proven techniques, e.g. using the top of the wave to step onto the ladder and the roll of the ship to aid the ascent. If conditions are such, that in the opinion of the Pilot a safe transfer cannot be made, then the attempt should be abandoned.

The Pilot should listen to advice from the coxswain and deck hand then dynamically assess the ability to safely board the vessel.

- 6.12 A clear decision whether the pilot boat should remain alongside or not during the transfer should be made between Pilot and coxswain prior to the Pilot leaving the cabin. Taking into account:
  - a) The height of climb
  - b) The pilot ladder arrangement
  - c) Prevailing environmental conditions.

If, under these circumstances, the pilot boat leaves the ship's side particular care must be made not to foul the ladder.

- 6.13 When the Pilot has a reasonably short climb, it may be appropriate for the pilot boat to remain alongside until the climb is completed, to ensure the pilot boat does not foul the ladder when leaving the ship's side.
- 6.14 Nothing should be worn over PPE that might interfere with its normal operation at any time. Please refer to Annex 2.5 for details of why this is not recommended. If the Pilot has a bag, *unless the bag has been designed for Pilot use specifically* a heaving line should MUST be used to lift it onto the ship, after the Pilot is clear of the ladder. The ship should be informed in advance.
- 6.15 The use of man ropes to assist the Pilot is the personal choice of the Pilot involved and should be provided or removed as required. This information should be passed to the ship at the earliest opportunity, to allow time for rigging or removal.

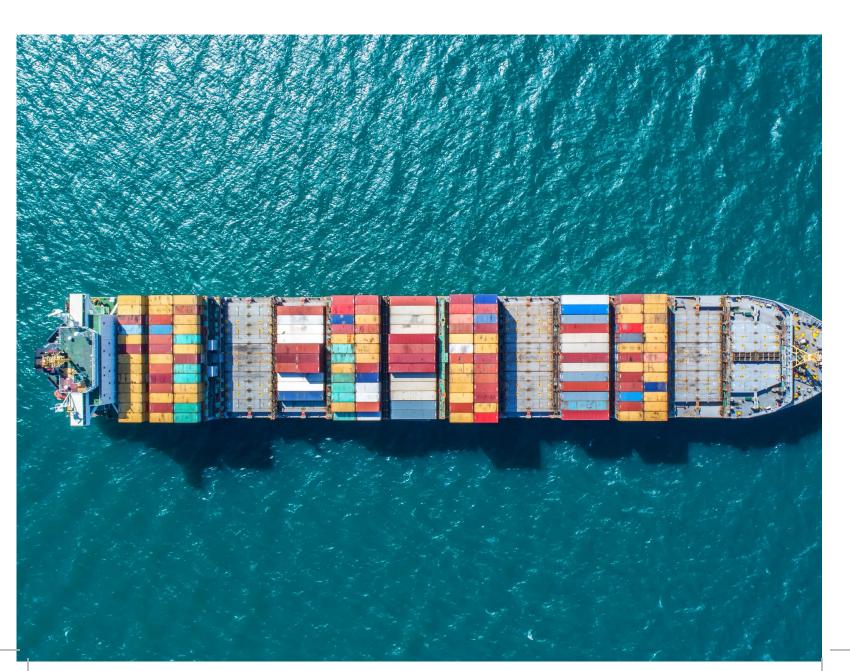


# 7. LOW FREEBOARD SHIPS

7.1 When the ship to be served has a freeboard near to, or less than, that of the pilot boat particular caution should be taken as these transfers can be amongst the most hazardous.

In these circumstances, there may be insufficient parallel body for the pilot boat to work against. Such situations can be worsened further if both the ship and the pilot boat are rolling or pitching. The potential for damage to the pilot boat or injury to Pilot and deck crew is increased. There is also an added possibility that the pilot boat may become hung up on the ship's side.

- 7.2 Before the transfer takes place, the coxswain and Pilot must be satisfied that the pilot boat is sufficiently stable alongside the ship for the transfer operation to be safely completed.
- 7.3 The Pilot should not stand outside the rail of the ship waiting for an opportunity to transfer. A side gate entrance should only be used if the gap between the stanchions is 700mm to 800mm, in accordance with SOLAS regulations.
- 7.4 When making the decision to transfer, the Pilot should give consideration to factors including but not limited to:
  - a) The availability of suitable handholds or stanchions at deck level.
  - b) The time taken to affect the transfer, particularly in adverse weather.
  - c) The deck condition including if the deck is awash.
  - d) Vessel fendering.
  - e) Interaction between the pilot boat and ship.
  - f) The physical capability of the Pilot.



# 8. PILOT DISEMBARKATION OPERATION

As Part of pre- seagoing Master- Pilot Exchange, Pilots may request to see the pilot ladder certificate before the ship leaves the berth in Port.

If time allows Pilot should inspect the ladder prior to departure to mitigate the chance of having a non-compliant ladder presented that he/she cannot disembark and being carried over.

- 8.1 As with embarkation, communication should be established between the ship and the pilot boat and the transfer arrangements confirmed in advance. The decision to disembark from a ship to the pilot boat rests entirely with the Pilot involved.
- 8.2 Before leaving the bridge, the Pilot should inform the master of:

a) Anticipated movements of any surrounding ships.

- b) VHF channels to monitor and reporting points.
- c) Heading and speed requirement for the Pilot transfer.
- d) The presence of navigational dangers, tidal height and flow.
- e) Any advice on the passage plan to be used post Pilot transfer.
- f) The anticipated helm or engine movements required to facilitate transfer.
- g) VHF channels for communication with pilot boat.
- h) Any adjustments to the pilot ladder required by pilot launch.
- 8.3 On arrival at the pilot ladder area the Pilot should check the condition and security of the pilot ladder both visually and from the officer on station. Any non-compliance or (potentially) unsafe arrangement should be reported to the CHA and MCA Marine Office immediately and the ladder must not be used until the non-compliance is rectified (see section 9). The Pilot should check their PPE is correctly donned. Any bag should be lowered to the Pilot boat by heaving line, once the Pilot is clear of the ladder, on the deck of the pilot boat. Refer to section 6.13.

Defects should be reported via The UKMPA Pilot App (which is now available for download and use on the Google Play Store for Android and on the App Store for Apple.) and also reported to Ports' Marine managers.

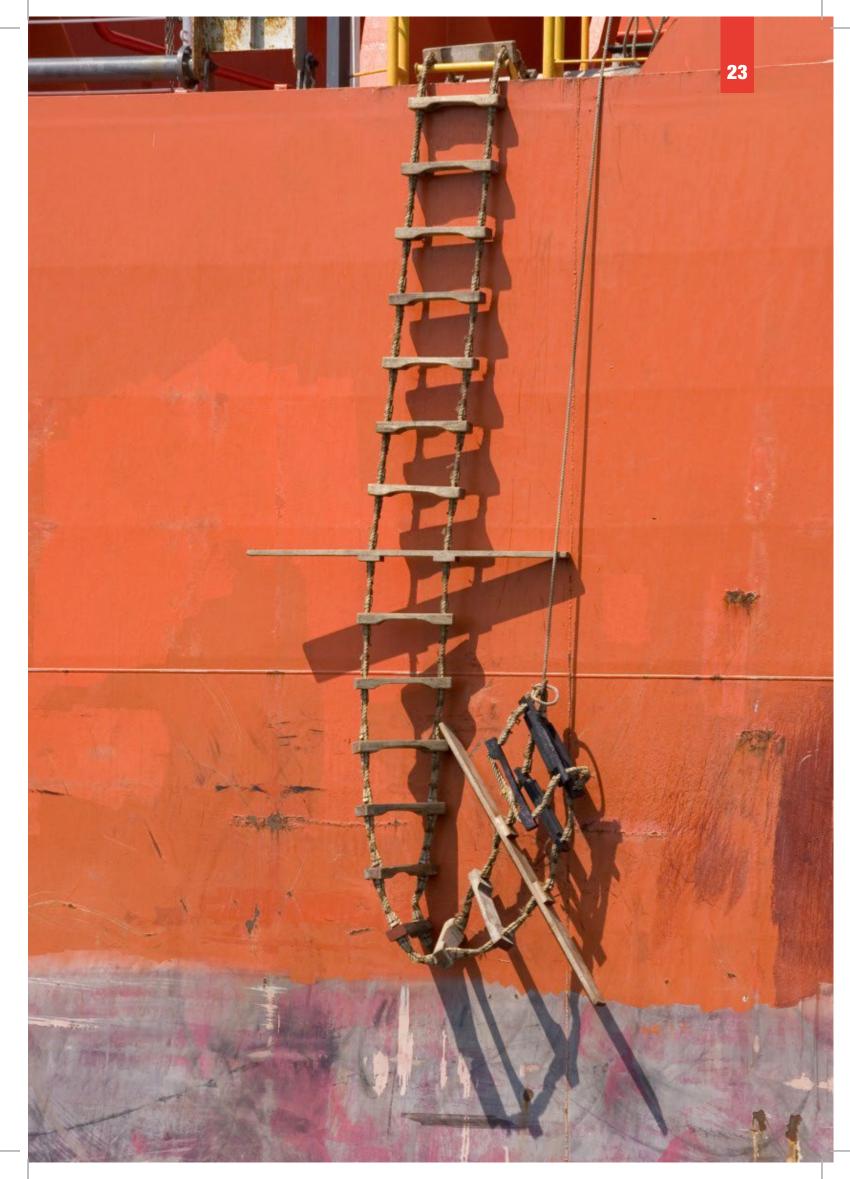
- 8.4 The pilot boat deck hand should be at the bottom of the ladder to ensure that the ladder is rigged at the correct height and clear.
- 8.5 Before stepping onto the ladder, the Pilot should check that the pilot boat is lying alongside and has not fouled the pilot ladder.
- 8.6 During the descent the deckhand should advise the Pilot how many steps to go to the deck of the pilot boat. As the Pilot is stepping from the ladder the deck hand is to be on hand to provide a timely warning of danger and to give physical assistance to the Pilot if required.

In adverse weather the stepping off point may not be the lowest step, therefore clear communication between the deck hand and Pilot is essential.

- 8.7 It is strongly recommended that whilst on deck, the deck hand is secured to the pilot boat by an approved method which does not restrict their freedom of movement.
- 8.8 It is recommended that the Pilot make their way to the cabin followed by the deck hand. The deck hand may be required to receive the Pilot's bag or equipment. The return to the cabin should be made by the safest route, taking into consideration the points made in section 6.5.
- 8.9 Once clear of the ladder, the deck hand should check the decks are clear and safe before proceeding back to the cabin. The coxswain should not leave the lee of the ship until all personnel are safely in the cabin. Once clear of the ship, the coxswain should call the ship on VHF and inform them that the pilot boat is clear and that the ship can resume its passage.

# **09. REPORTING OF DEFECTIVE OR NON-COMPLIANT PILOT BOARDING ARRANGEMENTS**

- 9.1 Responsibility for the safe transfer of pilots and marine personnel rests with each person involved in the activity to include pilots, pilot boat crew, master & crew, pilotage providers, CHA, vessel owner & operators as well as the person being transferred. All parties should be conversant with regulations and ensure safety is not compromised.
- 9.2 Issues with defective or non-compliant pilot boarding arrangements continue to be faced across the international port marine and pilotage industry. It is essential that deficiencies of defective or non-compliant pilot boarding arrangements are properly captured and reported to the Competent Harbour Authority, Maritime and Coastguard Agency, Marine Accident Investigation Branch and the ship concerned. The following provides some best practice on reporting:
  - a) Pilots and Pilot Boat Crew. It is highly likely that the pilot or pilot boat crew will be the first persons to observe the defective or non-compliant pilot boarding arrangement. CHA's should ensure that pilots and pilot boat crew are familiar with local reporting arrangements and will always be fully supported to stop the boarding / landing operation on the grounds of safety if necessary.
  - b) Competent Harbour Authority. CHA's should have robust reporting mechanisms and protocols in place, that ensure reports can be submitted to them quickly and efficiently (including out of hours). Reporting in a timely manner is essential as the Harbour Master may need to give a direction that results in delay or cancellation of boarding / landing operations. Reports can be submitted in a variety of ways including the following:
    - I. Verbal reports made to VTS / LPS via VHF or mobile phone.
    - II. By calling a Harbour Master or their representative
    - III. Via email
    - IV. By utilising approved reporting apps
  - c) Maritime and Coastguard Agency Local marine office. The local MCA marine office should be made aware of any report as soon as possible in order for potential port state control action to be considered. Reports should include as much detail as possible, including photographs (if available) and ref to which element of SOLAS / international recommendation the arrangement is thought to have breached. A list of MCA marine office contact details can be found <u>here</u>.
  - d) Maritime and Coastguard Agency Headquarters. When reports are submitted to an MCA marine office, MCA headquarters should also be included in copy. The MCA is capturing statistics centrally to monitor and maintain a central database. The following email address should be used to ensure MCA HQ are included in copy: PSC\_Headquarters@mcga.gov.uk
  - e) Marine Accident Investigation Branch. The MAIB are also very keen to receive reports and are maintaining a database in order to monitor trends. Reports to MAIB can be submitted using the following email address: ISO@maib.gov.uk
  - f) The Vessel. It is important that the ship is made aware of any issues with defective or non-compliant pilot boarding arrangements immediately. Whilst this is likely to be done via the pilot / pilot boat crew or perhaps VTS / LPS in the first instance, it is important that a formal written report is followed up from the CHA to the ship / agent. If the incident involves an outbound vessel this is particularly relevant and consideration should also be given to informing the next port of call.



# **10. LEAVING THE SHIP'S SIDE**

10.1 Should the pilot boat have difficulty leaving the side of a ship, the coxswain should communicate the problem to the master of the ship and request appropriate action be taken by way of helm and/or engine movements.

# **11. HEAVY WEATHER OPERATIONS**

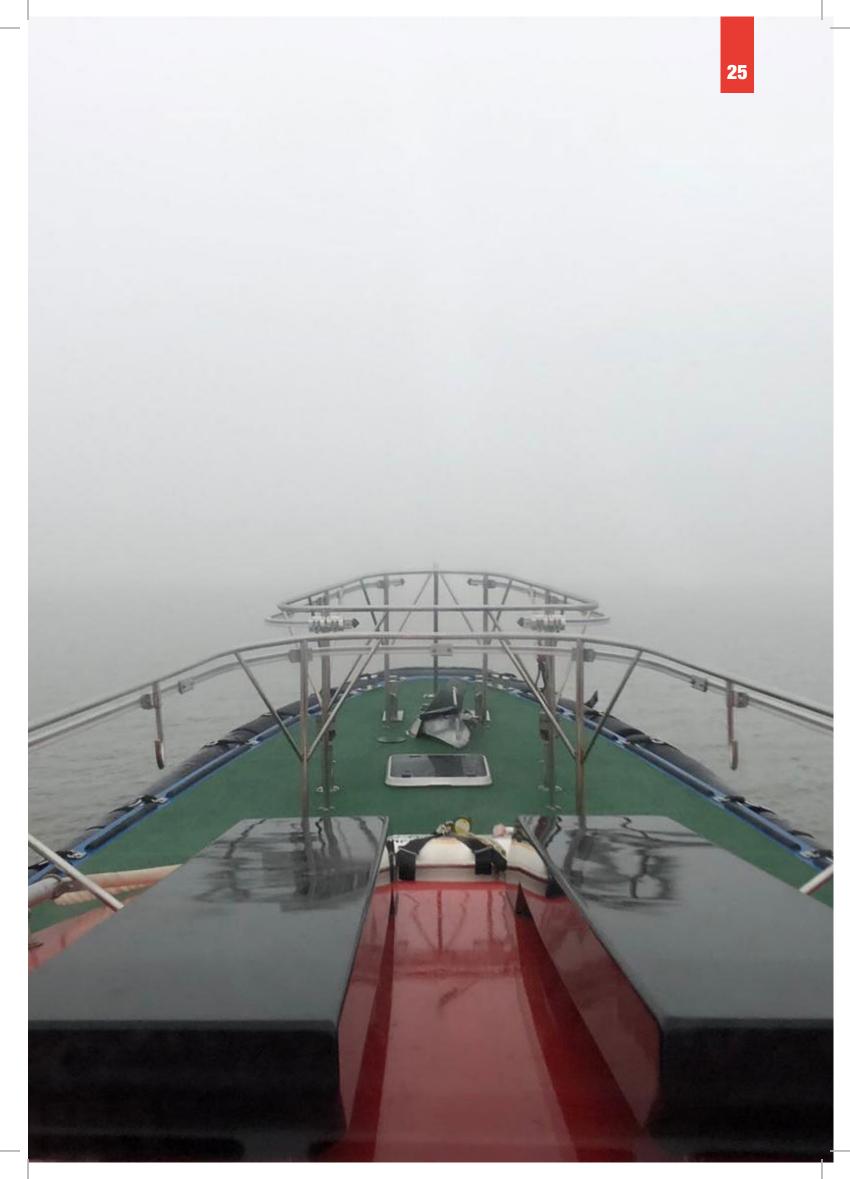
- 11.1 In heavy weather, pilot boats should proceed at a speed compatible with sea conditions and pilot boat design.
- 11.2 In fast pilot boats, use should be made of the seating provided in an appropriate manner, together with seatbelts where fitted.
- 11.3 To avoid injury on passage, the stowage of ancillary equipment should be designed to be clear of seating areas, with particular emphasis on the space around head and shin.

Vessels should have adequate storage space for Pilots and Crew PPE to be stored securely.

- 11.4 Loose equipment or stores should not be carried unless properly stowed.
- 11.5 n such weather conditions the risk associated with boarding operations are heightened. Neither the Pilot nor the deck hand should proceed from the cabin until the pilot boat is in the lee of the ship and decision to proceed with transfer has been made by the coxswain *and in accordance with local risk assessments*.

# **12. RESTRICTED VISIBILITY**

- 12.1 The pilot boat must be allowed extra time on task in order to proceed at a safe speed in restricted visibility. *The coxswain will be the judge of what constitutes a safe speed*.
- 12.2 In all cases of restricted visibility, when approaching the ship, the deck hand should provide lookout and assistance until the coxswain has a fully developed situational awareness. When leaving a ship the coxswain will, as far as practicable, remain alongside the ship until the deck hand can keep a lookout.
- 12.3 Where fitted, the Pilot boat radar should be operational and in use, except whilst alongside engaged in a pilot transfer (see section 4.12), unless due to the prevailing conditions it would impact on the navigational and situational awareness. Once the pilot is safely on board, use of the radar should continue.
- 12.4 Pilot boat AIS should be operational and used where fitted.
- 12.5 Pilot boat fog signal shall be operational and sounded in accordance with the International Regulations for the Prevention of Collision at Sea (ColRegs).
- 12.6 In restricted visibility it is imperative that VHF contact is established with the ship to be served. The ship's position, course, speed and position relative to other ships or navigational marks should be confirmed.



## **13. MAN OVERBOARD PROCEDURES**

LPS/VTS services must have a plan in place for the event of a person overboard from the ladder or launch. Plans may include special directions (where appropriate) to be given to the ship in event of Pilot being absent from the ship after a fall from the ladder, immediate reporting to emergency services and SAR, and responsibilities of Launch and VTS/LPS personnel. Please Refer to Local Work Instructions and Standard Operating Procedures for Port specific elements.

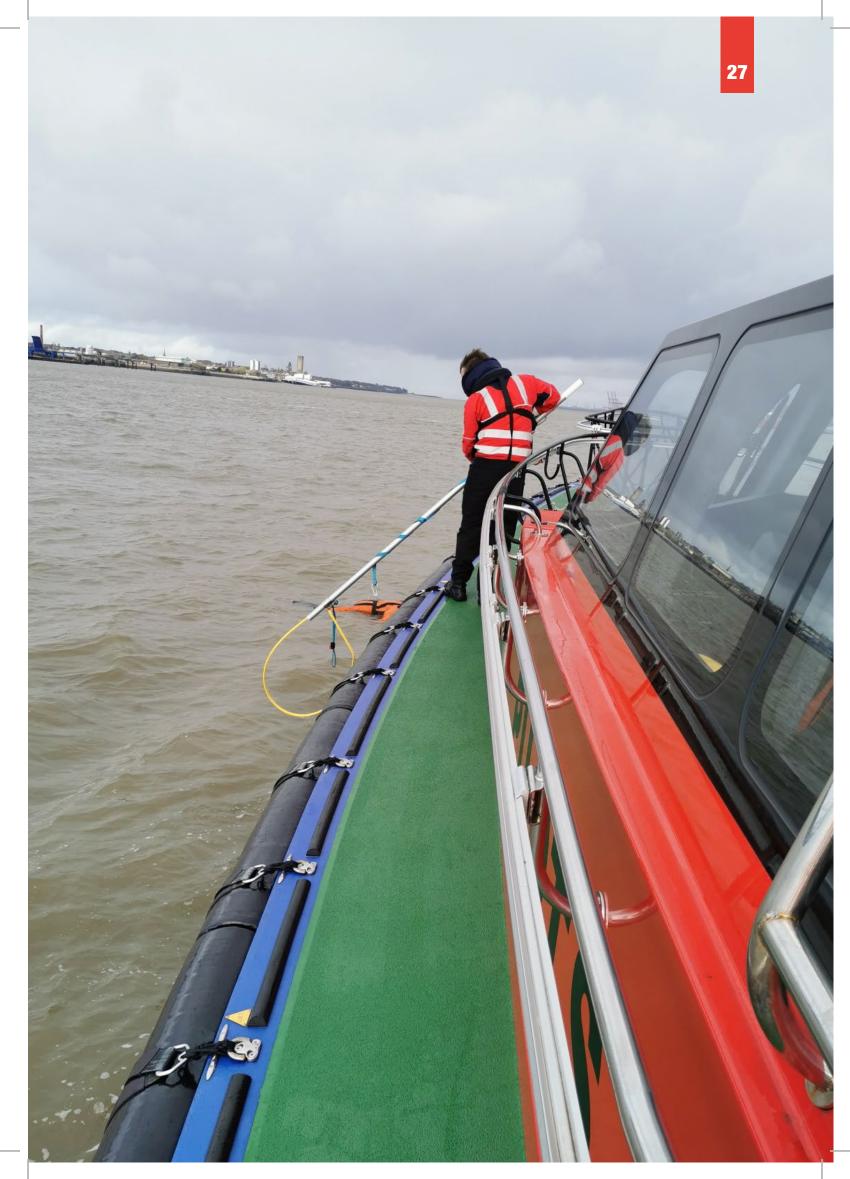
Plans to include specific landing areas with grid references for transfer to shoreside emergency services.

All Launches should have "grab cards"/Checklists specific to the launch to use in the event of a MOB. Drills should be practiced using these cards so that the correct procedure is followed and practiced.

- 13.1 In the event of a man-overboard incident it is essential to locate the casualty and maintain them in sight, a task to which all crew and Pilots on board must devote their whole attention.
- 13.2 Coastguard, Port Authorities and shipping must be informed immediately and lengthy communications should be avoided. Speed of sighting and recovery remain the priority.
- 13.3 Once the casualty is located, and as the pilot boat is being positioned, retrieval equipment should be prepared and deployed as appropriate.

If the rescue is to be carried out single handed, the retrieval equipment shall be prepared before getting into the retrieval location.

- 13.4 The method of recovery will depend on the equipment carried and the prevailing weather conditions. Recovery should be made as per well practiced drills. The method of recovery will depend on the equipment carried onboard and the weather conditions.
- 13.5 A full report of the man-overboard incident is to be submitted in accordance with the CHA procedures and national legislation



#### 14. TRAINING FOR PILOT BOAT OPERATIONS AND RETRIEVAL OF CASUALTIES

LPS/VTS services must have a plan in place for the event of a person overboard from the ladder or launch. Plans may include special directions (where appropriate) to be given to the ship in event of Pilot being absent from the ship after a fall from the ladder, immediate reporting to emergency services and SAR, and responsibilities of Launch and VTS/LPS personnel. Please Refer to Local Work Instructions and Standard Operating Procedures for Port specific elements.

Plans to include specific landing areas with grid references for transfer to shoreside emergency services.

All Launches should have "grab cards"/Checklists specific to the launch to use in the event of a MOB. Drills should be practiced using these cards so that the correct procedure is followed and practiced.

14.1 Prior to using a pilot boat, all pilots and pilot boat crews should receive training appropriate to their roles and responsibilities. This includes but is not limited to

a) Pilot boat operations

- b) Familiarisation with the Boarding and Landing Code and current regulations
- c) Training in how to recognise a compliant or non-compliant pilot transfer arrangement
- d) Position, stowage and correct use of pilot boat safety equipment, such as immersion suits and medical stores
- e) Operation and use of all man overboard equipment.
- f) Donning of and the correct use of PPE.

If launch crews switch between vessel types, they should Drill on all vessels at least once every 6 months.

- 14.2 Coxswains and pilot boat crew should be trained in the operation of the boat, its systems, pilot transfer operations and wholebody vibration issues. Competence should be demonstrated, recorded and maintained through a systematic process. If the rescue is to be carried out single handed, the retrieval equipment shall be prepared before getting into the retrieval location.
- 14.3 Success of a rescue from the water is directly related to:-

a) The competence and training of those undertaking the rescue.

- b) Familiarity with all recovery equipment and emergency life support skills, including artificial resuscitation.
- c) The ability to identify and provide treatment for cold-water shock, and hypothermia.

d) The personal survival skills of the casualty in the water.

Therefore, it is essential, all persons involved in pilot boat transfer operations, who may be involved in rescue from the water, should be competent in these areas as a minimum.

14.4 A retrieval drill for pilot boat crew and check listing of recovery equipment should be carried out on a regular basis and at no more than 6-month intervals to ensure a satisfactory level of competence. Where possible, this training should be undertaken in a realistic environment, representative of the prevailing conditions at the transfer position.

All drills and checks should be recorded with an appropriate logbook entry.

Recovery should be made as per well practiced drills. The method of recovery will depend on the equipment carried onboard and the weather conditions.

- 14.5 If launch crews switch between vessel types, they should Drill on all vessels at least once every 6 months. Pilots are a resource in the rescue of another pilot and/or pilot boat crew member. They should therefore receive the same training and meet the same drill practice standards as pilot boat crews in sections 14.3 and 14.4 above. Where possible, training should be at intervals in line with pilot boat crew training, but not exceeding 3 years. All sea-going pilotage staff should be trained in personal survival techniques.
- 14.6 All CHA's engaged in pilot boat operations should develop and have in place, emergency plans relating to pilot transfer operations.
- 14.7 Additional specialist training in emergency response and immediate emergency care should also be considered for both pilot boat crews and Pilots. *Peel Ports Group Marine will provide contact details of the chosen first aid supplier. The IEC course must be taken by all sea going staff.*

Drills are essential for building a second nature response to incidents and must be practiced by the launch crews at least once every 6 months, and with pilot interaction annually as a minimum.

Drills should be carried out with a Man overboard Manikin.

Drills should also include man overboard where only two persons are on board the launch. So for example where the deckhand falls overboard and the coxswain has to recover the deckhand single handed.

Pilots should learn from both perspectives being the rescuer and being the casualty. Seeing the equipment and how it is used by the launch will educate the Pilot in how he/she will be rescued. A smart casualty knows what to expect.

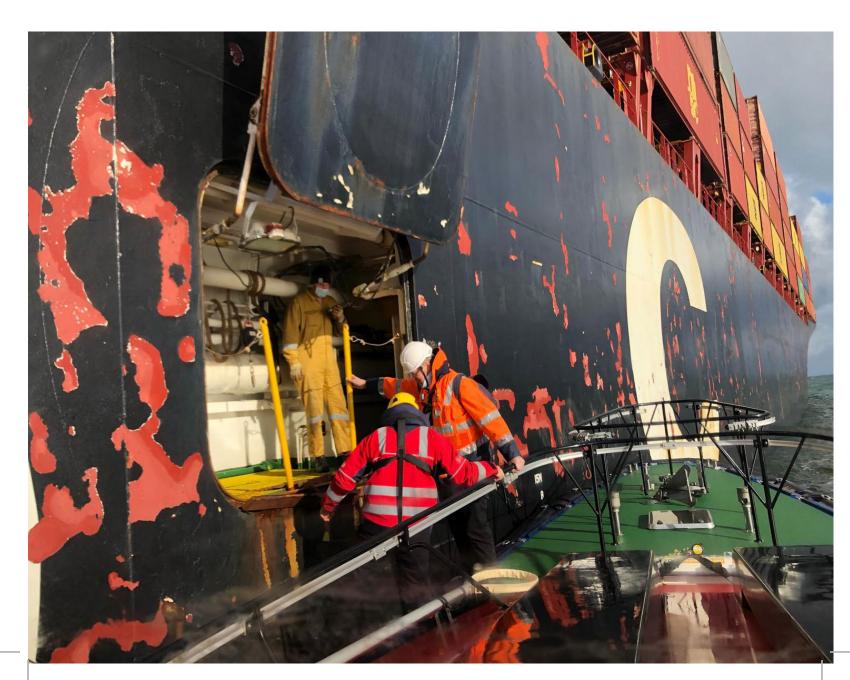
Drill Reports should be completed after each MOB drill. These reports are to include date, time, weather, description of rescue and photos and sent to the appropriate managers.

# **15. TRANSFER OPERATIONS INVOLVING NON-REGULAR SHIPS**

- 15.1 The CHA should, in consultation with Pilots, identify non-regular and unusual ships. The CHA, in conjunction with the Pilot and vessel operators, should risk assess in advance, any Pilot transfer operations involving non-regular or unusual ships.
- 15.2 High-speed craft and some Ro-Ro's, which do not have parallel sides that allow the ladder to lie flat, may request the Pilot to travel to and from the ship, from its port of origin.
- 15.3 Other non-regular vessels may pose additional issues that need to be addressed. Ladders should be sighted midships not forward, away from fixed fenders and overhanging obstructions, suitable lighting directed so as not to affect pilot boat crew vision and overboard discharges.
- 15.4 Tug and tows. When a Pilot transfer is to a tug the approach may have to be from forward of the beam to avoid the towing equipment. Transfer should be through a gate in bulwark and if no gate is available provision should be made for suitable stanchions/handholds placed between 70cm and 80cm apart together with a means of climbing over the bulwark. When transferring to an unmanned barge, the transfer arrangements should be closely inspected prior to use.
- 15.5 Boarding an unmanned tow cannot be conducted in accordance with this Code and therefore a special procedure following a risk assessment should be developed.

# **16. PILOT TRANSFER BY HELICOPTER**

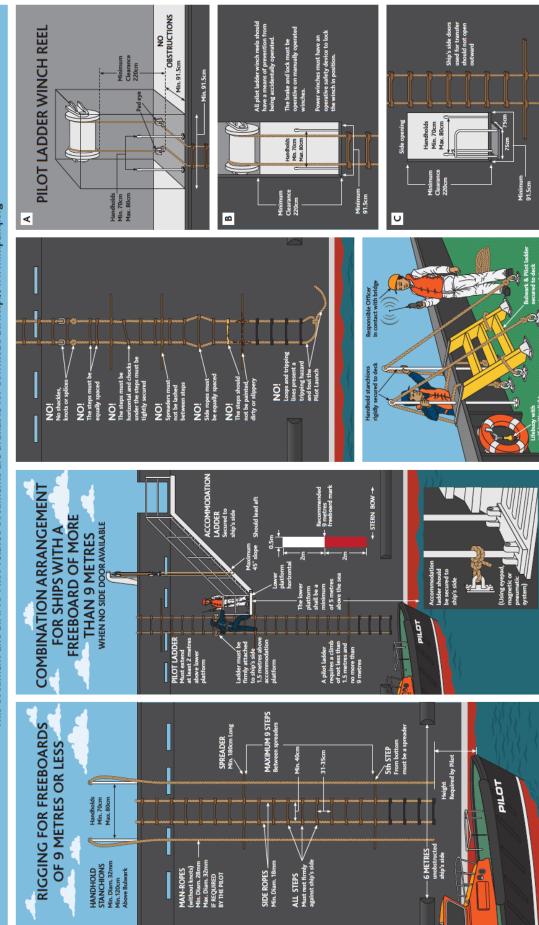
16.1 CHAs anticipating the introduction of a helicopter service for Pilot transfer operations must involve stakeholders in the production of appropriate procedures for normal operation and emergency response. These are to be based on a comprehensive risk assessment and with reference to industry best practice.



**REQUIRED BOARDING ARRANGEMENTS FOR PILOT** In accordance with SOLAS Regulation V/23 & IMO Resolution A.1045(27) MARTIME 3  $\geq$ 

INTERNATIONAL MARITIME PILOTS' ASSOCIATION

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**ANNEX 1** 

# **ANNEX 2**

- A2.1. All Pilots and pilot boat crew should wear appropriate PPE as identified by the duty holder. When selecting and issuing PPE, the duty holder should
  - a) Choose products that are CE marked in accordance with the Personal Protective Equipment (Enforcement) Regulations 2018
  - b) Choose equipment that suits the user, including but not limited to the size, fit and weight of the PPE. If the users help choose it, they will be more likely to use it.
  - c) CHA's must ensure that different items of PPE that must be worn together are compatible and effective
  - d) Instruct and train people how to use PPE, tell them why PPE is needed, when to use PPE and what its limitations are

There is no statutory minimum set of PPE for a Pilot or pilot boat crew undertaking Pilot transfer operations. The following has been identified by industry as good practice. However, it may not be suitable in all circumstances. The duty holder must conduct a risk assessment to identify so far as is reasonably practicable an appropriate set of PPE to mitigate their risks.

- a) SOLAS water switched light
- b) Water switched or manual strobe light
- c) Facial splash guard
- d) Crotch straps or beaver tail
- e) Rear crew assist becket
- f) Locator beacon (PLB, AIS, EPIRB)
- g) Whistle, to attract attention
- h) High visibility reflective tape to meet Class 2 Regulations
- i) Protective headgear to an appropriate international standard
- j) Protective footwear should be non-slip and anti-static and steel toecaps should be considered as part of a risk-based policy.
- k) Lifejacket covers should be Hi-Viz with vertical retro-reflective tape (this is to ensure that the lifejacket does not compromise the high visibility of a class 2 or class 3 coat when walking through the quayside areas).
- A2.2 Pilots and pilot boat crew should receive training when new PPE is issued and regular checks should be undertaken in accordance with the manufacturer's recommendations. In addition, refresher training is recommended at intervals not exceeding 5 years.

Toolbox Talks will be conducted when new PPE is issued.

- A2.3 Recommended daily checks before donning lifejacket, pilot coat and helmet include:
  - a) Check service history and next service date
  - b) Check the Co2 cylinder is screwed in and hand tight
  - c) Check the firing mechanism is ready
  - d) Check the oral tube cover is in the correct position
  - e) Check lights and beacon are operational
  - f) Check lifejacket or pilot coat for any signs of damage
  - g) Check helmet for any signs of damage
- A2.4 After donning lifejacket or pilot coat
  - a) Ensure all buckles, zips and clips are correctly fastened
  - b) Ensure crotch straps are correctly fitted and tightened
  - c) Ensure helmet chin strap is securely fastened
  - d) Ensure that beacons are in the armed position

Note the wearing of crotch straps with lifejackets is essential, to prevent the lifejacket from rising up above the head.

The "Brother's Keeper" approach should be implemented, and all embarked personnel should check each other's PPE is donned correctly before leaving the wheelhouse.

A2.5 Unless used as part of an approved PPE system and appropriately risk assessed, the wearing of rucksacks and bags whilst

climbing a ladder is not recommended for the following reasons:

- a) Wearing a bag will impair the ability to climb
- b) A bag with the straps over the shoulder or across the chest can impair the inflating of a lifejacket or pilot coat
- c) When falling from a ladder the shape and size of the bag will affect the stresses on the body when hitting the water
- d) The angle of float created by a lifejacket or pilot coat could be compromised by pockets of air within the contents of the bag

# **ANNEX 3**

#### A3.1 Pilot Ladder Training course

A Pilot ladder training course has been developed in conjunction with Fleetwood Nautical College to provide the necessary familiarisation and training for personnel embarking/disembarking via Pilot ladder. This is coordinated through Group Marine and is reflected on the LMS training requirement for appropriate marine personnel, with a revalidation period of 5 years for Pilots and 3 years for less regular climbers such as Marine Managers/ LPSOs/ VTSOs and Planners.

It is a mandatory requirement for all Peel Ports personnel who may be required to embark or disembark a vessel underway to have completed a Pilot ladder training course approved by Peel Ports.

The course includes a 9-meter pilot ladder climb and, as the first few minutes are key to survival following a fall into the sea, it also includes a fall from height into a swimming pool with a wave generation capability. This provides familiarisation with the operation of the PPE during those vital first few minutes.

#### A3.2 Classroom Topics

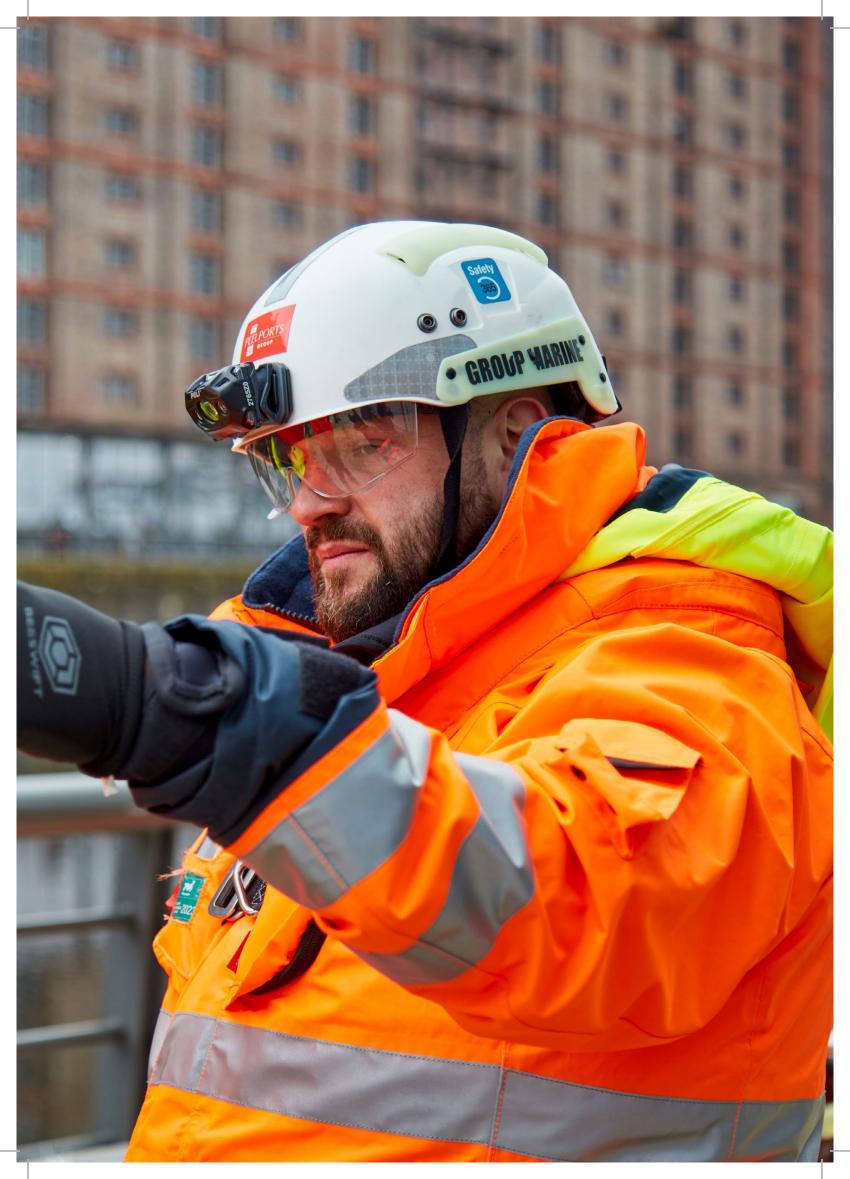
- Brief on Regulations
- Examples of non- compliant ladders if old condemned ladders can be sourced.
- Importance of knowing the Launch, location of LSA / roles and Responsibilities onboard
- Moving from the Wheelhouse to the bow and preparing for boarding visa-versa
- Climbing the ladder and accessing the deck of the ship
- Combination ladders
- Disembarking and checking the ladder prior
- Step-across transfers
- Bag transfer and the effect of wearing a bag whilst climbing
- Hadrian's Rail usage
- Effective communication with launch and vessel crew
- Recent Accidents and Lessons learnt
- Powers to say no to defective ladders
- Reporting defects
- Recovery/Rescue methods in the event of MOB
- PPE daily and buddy checks to be carried out
- A3.3 Practical in pool/ Outdoor Tower
  - Transfers to a Pilot ladder from vessel in a variety of conditions (different sea states and Lighting to be simulated)
  - Climb a 9m Rope Pilot ladder (whist attached to fall arrest)
  - Techniques to move across from pilot ladder to accommodation ladder
  - Techniques for moving from ladder onto ship
  - Survival techniques in own PPE test own PPE a complete set in the water. Enter water from height to simulate falling from Ladder
  - Recovery methods to the launch



#### REFERENCES

- Pilotage Act 1987 as amended
- International Convention for Safety of Life at Sea, 1974 (SOLAS) Chapter V Regulation 23 (Ch V, Reg. 17 applicable before 1 July 2002)
- International Maritime Organization (IMO) Resolutions A.960(23), A.1108(29), A.1045(27), MSC.1/Circ 1375 and MSC 90/22/1/corr.1
- Merchant Shipping (Small Workboats and Pilot Boats Regulations 1998 (SI 1998 No. 1609)) as amended
- Port Marine Safety Code (PMSC) as amended
- PMSC Guide to Good Practice as amended
- International Maritime Pilots' Association (IMPA) Required Boarding Arrangements for Pilots
- United Kingdom Maritime Pilots Association Personal Protective Equipment (PPE) and Clothing for Marine Pilots
- Small Commercial Vessel Code Maritime & Coastguard Agency (MCA)
- The Merchant Shipping (Distress Signals and Prevention of Collisions) Regulations 1996
- Merchant Shipping Notice (MSN) 1905 (M+F) Application of the ships' medical stores regulations 1995
- Merchant Shipping Notice (MSN) 1781 (M&F), as amended
- Marine Guidance Note (MGN) 50 (M) Manning of Pilot Boats
- Marine Guidance Note (MGN) 432 (M) Safety During Transfers of Persons to and from Ships
- Marine Guidance Note (MGN) 436 (M+F) WHOLE-BODY VIBRATION: Guidance on Mitigating Against the Effects of Shocks and Impacts on Small Vessels
- · Small Vessels in Commercial Use for Sport or Pleasure, Workboats and Pilot Boats Alternative
- Construction Standards (SCV Code) (MGN 280 M)
- ICS Guide to helicopter/ship operations 4th Edition Appendix E & H Marine Pilot Transfer
- UKMPA website www.ukmpa.org
- IMPA website www.impahq.org





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