The Bahamas Maritime Authority

Version No. 1.0

Issue Date 13/04/2022

Effective Date 13/04/2022

# CIC on Pilot Transfer Arrangements 2021-Results Analysis Report

Notice to ship owners, managers, Masters, Approved Nautical Inspectors, Recognised Organisations and surveyors

## 1. Purpose

1.1. This Notice documents the results of the Concentrated Inspection Campaign (CIC) on Pilot Transfer Arrangements, which was carried out by the Bahamas Maritime Authority Inspectors and vessel staff between 01 July and 31 December 2021.

1.2. The results are presented in the Annex to this document.

1.3. The BMA takes the opportunity to thank all Parties for their input and engagement in this CIC.

## 2. Application

2.1. For information only. Please also refer to Information Notice 18.

## 3. Queries

3.1. Any queries on this Notice may be submitted to tech@bahamasmaritime.com or any BMA office.

## Revision History

| Version | Description of Revision |
|---|---|
| 1.0 | First Issue |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |
| | |

# CIC on Pilot Transfer Arrangements 2021-Results Analysis Report

## 1. Executive Summary

During the campaign, a total of 258 inspections were carried out with the CIC questionnaire involving 258 individual ships managed by 99 companies around the world. Of this quantity, a total of 103 deficiencies were identified in four deficiency categories defined. This means, that in 194 cases out of 258 different vessels (75.2%) the pilot transfer arrangements were meeting SOLAS requirements and had no deficiencies.

A total of 64 questionnaires had at least one non-compliance to a requirement, resulting 24.8% vessels out of total inspected vessel.

The most notable non-conformities observed were lack of load testing of the ladders used over 30 months in accordance with the requirements of ISO 799-1:2019, including discrepancies in ladder certifications and ladder step tags (48%), followed by deficiencies found in pilot ladder rigging(25%) and construction (25%).

A total of 43 CIC inspections on Bulk Carriers, followed by Oil and Chemical Tankers with 41 inspections, General Cargo with 37 inspections, Gas carriers (LNG/LPG) with 33 inspections, Reefer vessels with 28 inspections, Passenger and Ro-Ro vessels with 20 inspections, Car Carriers with 15 inspections and Container vessels with 13 inspections, done mainly by the BMA authorized flag inspectors (238 inspections, 93%).

The highest number of deficiencies found from Passenger/ Ro-Ro vessel category totalling 22 deficiencies which was a 21.4% deficiency contribution, followed by Oil Tankers/ Chemical Tankers with 16 deficiencies (15.5%) and General Cargo and Bulk Vessels with equal number of 14 deficiencies (13.6% each).

This campaign also identified vessel technical managers whose managed vessels that had zero deficiencies found.

## 2. Objective of the CIC

The objective of the campaign was to make safer pilot transfer arrangements on vessels under the registry by considering fatalities reported by the International Maritime Pilot's Association.

## 3. Scope of the CIC

The Campaign aimed at checking the conformity with safety regulations for ships' pilot transfer arrangements, the competency of crew involved in rigging and maintenance of pilot ladder operations and the current condition of equipment.

The campaign targeted 4 aspects to verify compliance provisions of SOLAS Chapter V to assure that:

i) Equipment shall conform with valid legal certificates, and shall be accompanied with proper records;
ii) Related equipment shall be designed and constructed with valid type approval certificates;
iii) Associated equipment shall receive proper maintenance and shall be in a condition to function properly; and
iv) The Vessel Masters, officers and crew in carrying out their duties shall be familiar with safe rigging of pilot transfer equipment.

## 4. Resources of the CIC

BMA Approved Nautical inspectors and vessel/ shipping companies could refer to the following:

- SOLAS 74 Chapter V, regulation 23
- International Maritime Organization (IMO) Resolution A.1045 (27)
- IN018-Pilot-Boarding-Arrangements (IN018-Pilot-Boarding-Arrangements-v1.2.pdf)
- Safety Alert 21-01 (Safety Alert 21-01 (Pilot transfer arrangements) v1.0 (bahamasmaritime.com)
- Technical Alert 21-09 (bahamasmaritime.com)
- BS ISO 799-1:2019 BSI Standards

## 5. Summary Analysis, Conclusions and Recommendations

### 5.1 Summary Analysis

During the campaign, a total of 258 onboard inspections were carried out (see table 1). 238 inspections were carried out by BMA approved flag inspectors and 20 inspections were carried out by the Masters of individual vessels (See figure 1).

Analysis of results of the CIC revealed following:

5.1.1 A total of 103 deficiencies related to pilot transfer systems and their use were identified from 258 vessels which belong to 99 ship management companies

5.1.2 Since some vessels reported more than one deficiency, the number of vessels reported at least one deficiency was 63 vessels out of 258, which is 24.4%.

5.1.3 The majority of deficiencies (49 cases representing 48% of total deficiencies) reported were related to the ladder certifications/tags including load testing requirement followed by Rigging (25 cases, 25%) and Construction (26 cases, 25%) related deficiencies (see figure 2).

5.1.4 Highest number of deficiencies related to certification/tags including load testing requirement (13 cases out of 49) reported from 8 Passenger/Ro-Ro vessels belong to 8 different passenger/Ro-Ro ship management companies (see figure 4 and 5)

5.1.5 Second highest number of deficiencies related to rigging of ladders (6 cases from oil tankers and 6 cases from bulk carriers out of 26 total deficiencies) reported from 6 bulk carriers managed by 5 bulk carrier management companies and 4 oil tankers managed by 4 tanker management companies (see figure 4 and 5).

5.1.6 258 vessel inspections comprises of 43 inspections on Bulk Carriers (16.7%), 41 inspections on Oil/Chemical tankers (15.9%), 37 inspections on general cargo vessels (14.3%), 33 inspections on Gas carriers (12.8%), 28 inspections on reefer vessels (10.9%), 20 inspections on passenger/Ro-Ro vessels (7.8%), 15 inspections on car carrier vessels (5.8%), 13 inspections on container vessels (5.0%), 10 inspections on research vessels (3.9%), 10 inspections on offshore supply vessels (3.9%), 4 inspections on Drill Ships (1.5%), 2 inspections on FPSO (0.8%) and 2 inspections on tugs (0.8%) – (See figure 3)

5.1.7 Passenger/Ro-Ro vessels reported the highest deficiencies per inspection ratio of 110%. These results derived from 22 deficiencies reported from 20 inspections. Car Carriers and Offshore Support Vessels reported the lowest deficiencies per inspection ratio of 20% (see figure 4)

**5.2 Conclusions**

5.2.1 High deficiency rate on passenger/Ro-Ro vessels in relation to ladder certificates/ tags including the load testing after 30 months use requirement raise concern on industry level of compliance to ISO 799-1:2019 under the SOLAS Chapter V Regulation 23 and IMO Resolution A.1045 (27).

5.2.2 It was observed that there is a lack of awareness across the industry on the load testing of pilot ladders after 30 months use or replacement requirement. This could be due to ambiguous referencing of the ISO requirement under SOLAS Chapter V Regulation 23.

5.2.3 The second highest deficiency rate reported related to dangerous rigging practices and using shackles against steps in securing pilot ladders. Since this CIC campaign included a pilot ladder rigging drill, most of the malpractices were identified and corrected during the campaign period. This suggests updating SOLAS Chapter V Regulation 23 to incorporate correct rigging methods to improve awareness through the wider industry.

5.2.4 As a direct result of this campaign carried on board vessels, many companies embraced and implemented policy changes to assure the highest standards for their fleets.

**5.3 Recommendations**

Non-compliance or inadequacy of the Pilot ladder certification and load testing after 30 months use in accordance with the requirements of ISO 799-1:2019 is a significant potential danger to the pilots.

Thereby it is recommended:

5.3.1. Basic findings of the report in general, analysis of the deficiencies and breakdown of major non-conformities by ship type, to be submitted to IMO III Sub-committee.

5.3.2 Pilot ladder rigging drill to be included permanently in the BMA BORIS vessel inspection database;

5.3.3 Make it as a compulsory item to check pilot ladder certificates and load testing after 30 months use into to the vessel inspection checklist through BORIS.

**6. Detailed Analysis**

6.1 **General Analysis**

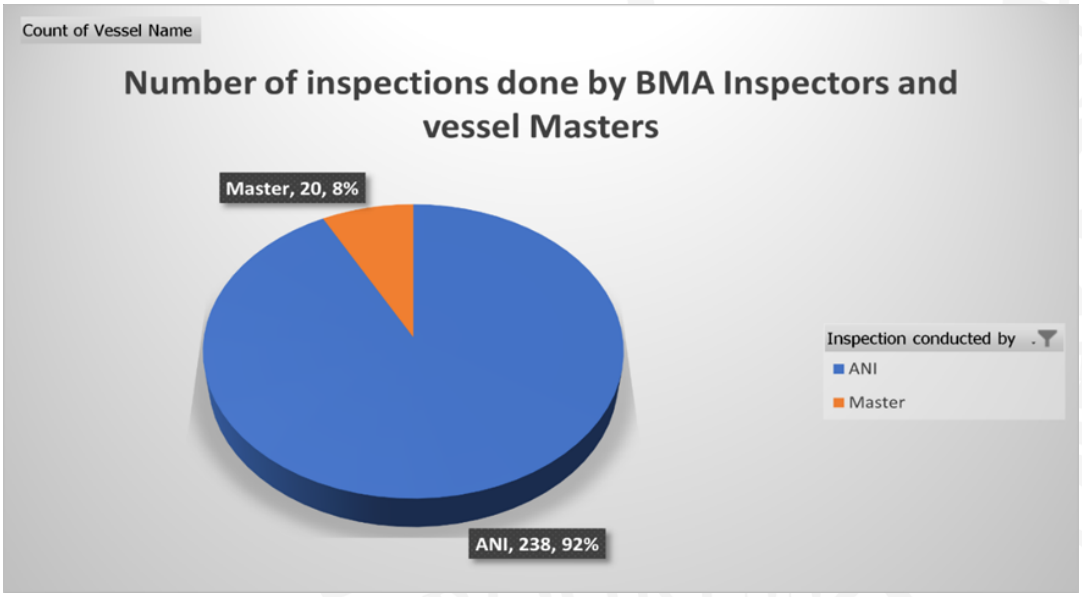
6.1.1 The total number of ships inspected and the total number of deficiencies identified during the CIC are presented in Table 1.

**Table 1** Summary of inspections during the CIC

| Vessel Type | Number of Deficiencies | Number of inspections |
|---|---|---|
| Bulk | 14 | 43 |
| Car Carrier | 3 | 15 |
| Container | 6 | 13 |
| Drill Ship | 4 | 4 |
| FPSO | 0 | 2 |
| Gas | 8 | 33 |
| General Cargo | 14 | 37 |
| Offshore support | 2 | 10 |
| Oil Tanker | 16 | 41 |
| Passenger | 22 | 20 |
| Reefer | 7 | 28 |
| Research vessel | 7 | 10 |
| Tug | 0 | 2 |
| **Grand Total** | **103** | **258** |

6.1.2 The vessel categories Bulk, Gas, General Cargo, Oil Tanker and Passenger made 67.4% of inspections generating 71.8% deficiencies.

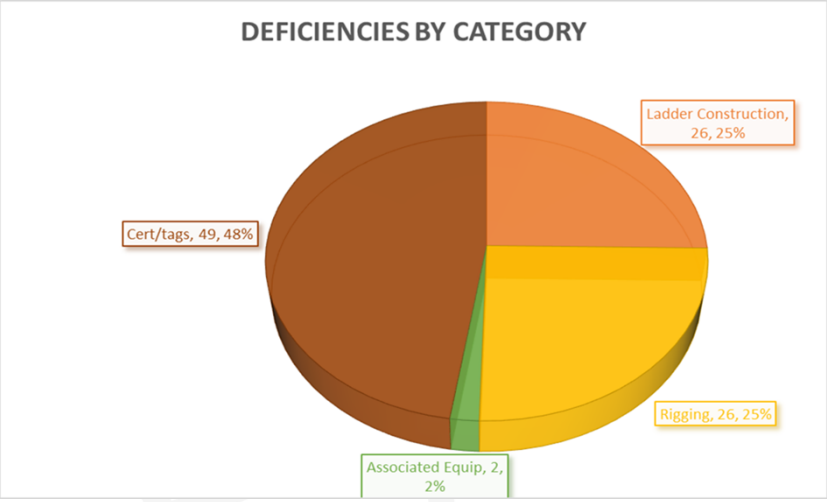
**Figure 1** Number of inspections done by the BMA inspectors and Masters




6.1.3 Figure 1 shows that 92% of inspections (238 inspections) had been carried out by the BMA approved flag inspectors in parallel to annual vessel inspections. Therefore, the outcome of inspections are more reliable reflecting true nature of the pilot transfer arrangements on each vessel inspected.

6.1.4 The identified deficiencies were categorized into deficiencies related to rigging, ladder construction, associated equipment and ladder certification/tags including load testing. Since some vessels reported more than one deficiency, the number of vessels reported at least one deficiency was 63 vessels out of 258, which is 24.4%.

**Figure 2** Deficiencies by category

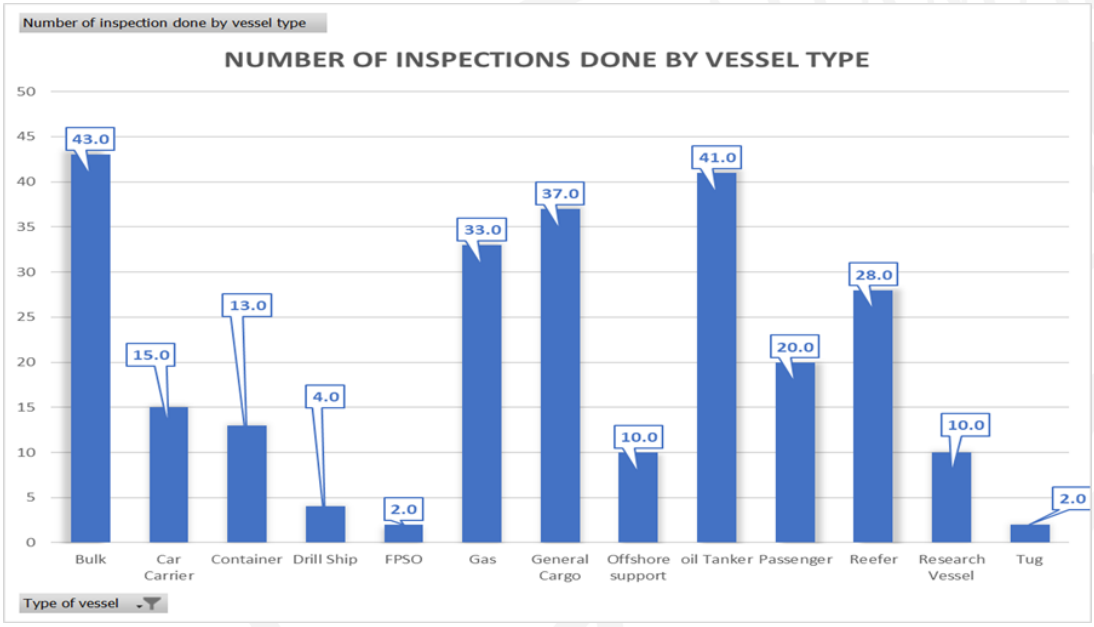



6.1.5 The majority of deficiencies (49 cases representing 48% of total deficiencies) reported were related to ladder certifications/tags including load testing requirement followed by Rigging (25 cases, 25%) and Construction (26 cases, 25%) related deficiencies.

## 6.2 Analysis by Vessel Type

6.2.1 The following Figure 3 shows the number of inspections carried out on different vessel types. The 258 inspections were completed on different vessel types under the management of 99 different technical managers around the world.

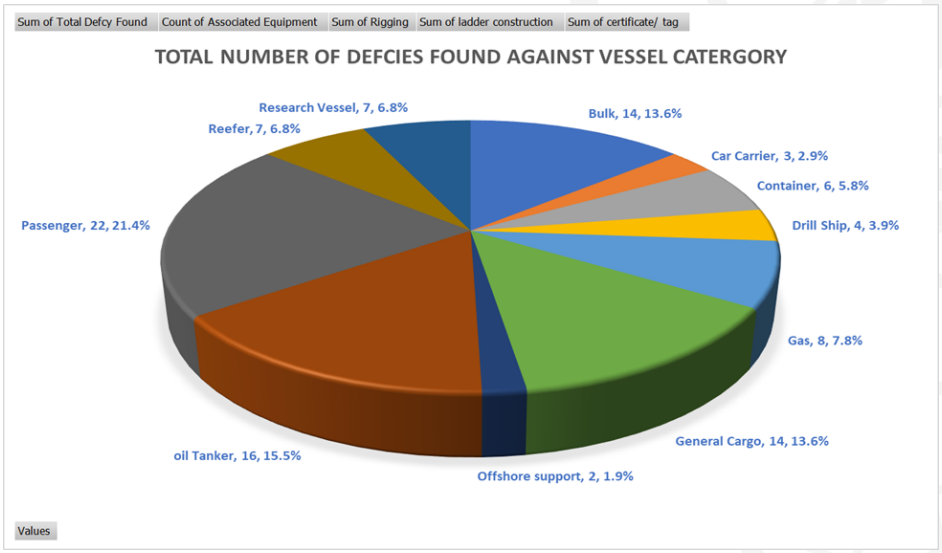
**Figure 3** Number of inspections done by vessel type




6.2.2 258 vessel inspections completed comprises of 43 inspections on Bulk Carriers (16.7%), 41 inspections on Oil/Chemical tankers (15.9%), 37 inspections on general cargo vessels (14.3%), 33 inspections on Gas carriers (12.8%), 28 inspections on reefer vessels (10.9%), 20 inspections on passenger/Ro-Ro vessels (7.8%), 15 inspections on car carrier vessels (5.8%), 13 inspections on container vessels (5.0%), 10 inspections on research vessels (3.9%), 10 inspections on offshore supply vessels (3.9%), 4 inspections on Drill Ships (1.5%), 2 inspections on FPSO (0.8%) and 2 inspections on tugs (0.8%).

6.2.3 Figure 4 shows number of deficiencies and their percentages to the total number of deficiencies in each vessel type.

**Figure 4** Total number of deficiencies found in each vessel type

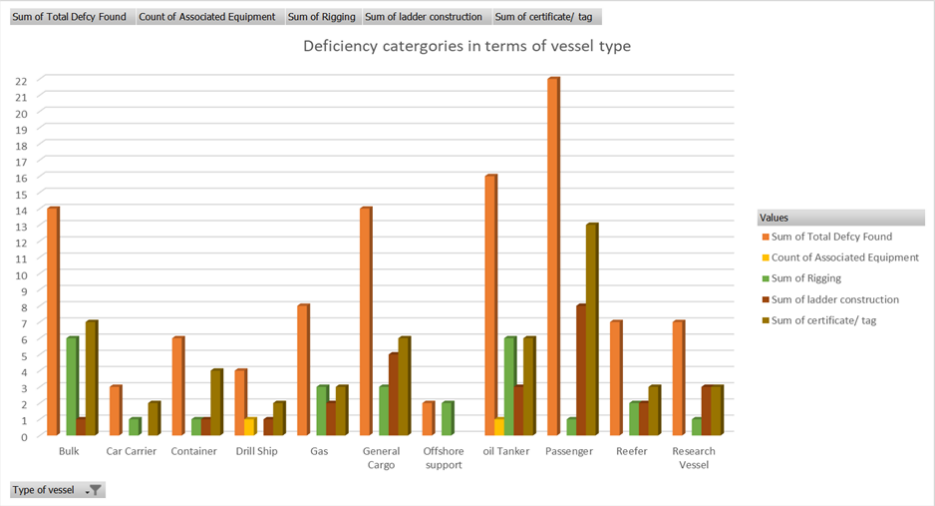


6.2.4 The maximum number of deficiencies reported from Passenger/ Ro-Ro vessel type accumulating 22 deficiencies and contributing a 21.4% ratio to the total number of 103 deficiencies. The second highest deficiency number reported from Oil/Chemical tanker type accumulating 16 deficiencies and contributing a 15.5% ratio to the total number of deficiencies.

6.2.5 The total number of rigging deficiencies found was 26 from all vessel types. Oil Tankers and Bulk Carriers reported the second highest deficiency category in the same, accumulating 6 deficiencies each in both vessel types. This is a 46% ratio contribution to the deficiency category by Oil Tanker and Bulk vessel types together.

6.2.6 Figure 5 analyses category of deficiencies in relation to each vessel type. The highest number of deficiencies reported was 49 in the category of certificates/tags including load testing of ladders. The highest number of deficiencies in a single vessel type in the same category reported was from the passenger/Ro-Ro vessel types accumulating 13 cases. This is a ratio of 26.5% contribution to the deficiency category of Certificates/tags by the passenger vessels.

**Figure 5** Deficiency categories in terms of vessel type.




6.2.7 The line diagram in the bar chart below (Figure 6) shows this ratio for different type of vessels. The highest ratio of 110% reported by passenger/ RO-RO vessels following Drill Ships. However, the ratio on Drill Ships to be ignored as the number of inspections are low as 4. Therefore, second highest ratio recorded by Research Vessels (70%).

6.2.8 Car Carriers and Offshore Support Vessels reported the lowest ratio of 20%. The ratio reported by FPSO was neglected due to low number of inspections (2 inspections only).

**Figure 6** Ratio between number of deficiencies and number of inspection in each vessel types.