

**Board of Pilot Commissioners for the Bays of
San Francisco, San Pablo, and Suisun**

660 Davis Street, San Francisco, CA 94111
Phone: (415) 397-2253 Fax: (415) 397-9463
bopc@bopc.ca.gov
www.bopc.ca.gov



March 22, 2021

To all ship-owners, operators, masters and agents of vessels:

Re: Safe Boarding Arrangements for Board-licensed Pilots

The Board of Pilot Commissioners for the Bays of San Francisco, San Pablo and Suisun (Board) licenses and regulates maritime pilots who are authorized to board vessels 12 miles west of the Golden Gate Bridge in all manner of challenging weather conditions to navigate those vessels into and out of the San Francisco Bays. The Board has an oversight role in safeguarding pilot safety and recognizes the importance of a properly rigged pilot ladder to ensure pilot safety. The Board is empowered to investigate pilot ladder and boarding equipment safety violations reported by a Board-licensee. These reports are forwarded to the United States Coast Guard (USCG), who is empowered to take enforcement action when deemed necessary.

On November 5, 2020, the USCG issued Marine Safety Information Bulletin (MSIB) 21-20 (Change 2). The MSIB highlighted the risks to pilots of operating in an unforgiving marine environment and the recent deaths of maritime pilots while embarking commercial vessels. The MSIB strongly recommends the replacement of any trapdoor configured pilot boarding arrangement to meet the guidelines of International Maritime Organization (IMO) Resolution A.1045(27)—*Pilot Transfer Arrangements*.

The Board supports the recommendation of the USCG in MSIB 21-20 (Change 2), and strongly encourages vessels entering the Board's jurisdiction to follow the latest guidance from the IMO particularly as it pertains to combination ladder arrangements involving a trapdoor. The Board respectfully requests that all ship-owners, operators and ship masters review their pilot boarding arrangements, and if they utilize the trapdoor configuration, to confirm if the pilot ladder arrangement is aligned with the latest IMO recommendations. If not, the Board also strongly encourages pilot boarding equipment be upgraded or replaced as soon as possible to align with the IMO guidance.

Please review the attached MSIB 21-20 (Change 2) which has an excellent graphic depiction of a Safety of Life at Sea (SOLAS) compliant combination ladder arrangement utilizing the trapdoor configuration.

Your review and possible replacement or upgrade of the trapdoor pilot boarding equipment at the earliest opportunity is appreciated and would reflect a sincere concern for the pilot's safety and the safety of all personnel utilizing the boarding equipment.

Sincerely,

Allen Garfinkle
Executive Director

Enc.



Marine Safety Information Bulletin

Commandant
U.S. Coast Guard
Inspections and Compliance Directorate
2703 Martin Luther King Jr Ave SE, STOP 7501

MSIB Number: 21-20, Change 2
Date: November 05, 2020
E-Mail: FlagStateControl@uscg.mil
Washington, DC 20593-7501

Recommendation for Pilot Transfer Arrangements

Recent deaths of maritime pilots while embarking commercial vessels highlight the risks of operating in an unforgiving maritime environment. To ensure the safety of all personnel boarding a vessel at sea, the Coast Guard reminds vessel owners and operators of the requirements contained in the Safety of Life at Sea (SOLAS) Chapter V, Regulation 23 and **strongly recommends** that owners and operators follow the recommendations within IMO Resolution A.1045(27) – *Pilot Transfer Arrangements*.

For vessels with equipment and arrangements installed on or after July 1, 2012, combination arrangements involving a trapdoor configuration are required to comply with SOLAS Chapter V, Regulation 23.3.3.2.1. A graphic depiction of a SOLAS compliant combination arrangement involving a trapdoor is included as an enclosure (Source: American Pilots Association).

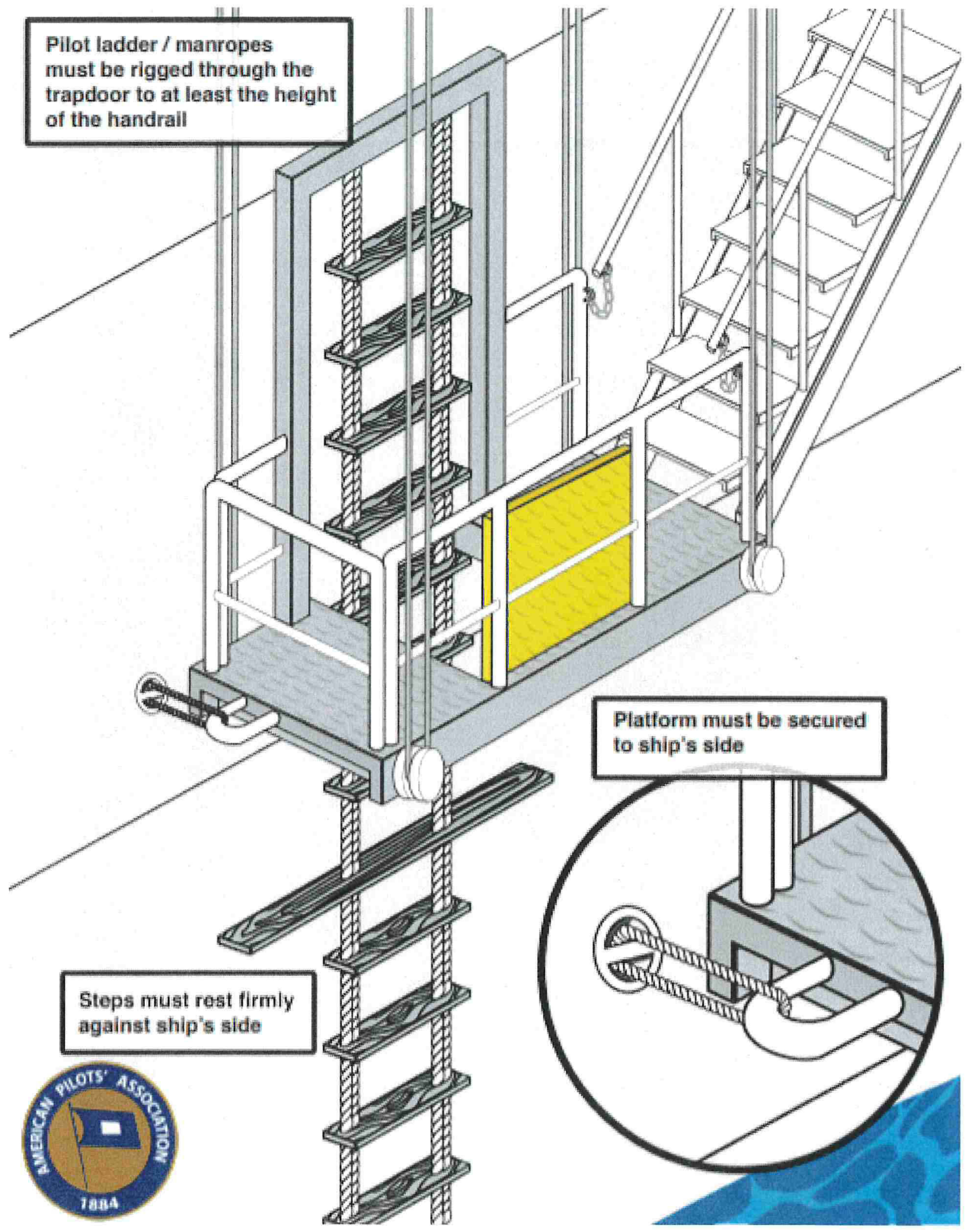
In accordance with SOLAS Chapter V, Regulation 23.1.4, equipment and arrangements installed on or after 1 July 2012, which are a replacement of equipment and arrangements provided on ships before 1 July 2012, shall, in so far as is reasonable and practicable, comply with the requirements of SOLAS Chapter V, Regulation 23.3.3.2.1. The Coast Guard **strongly recommends** that such replaced equipment and arrangements meet the recommendations within IMO Resolution A.1045(27).

For vessels registered in the U.S., Coast Guard marine inspectors and classification society surveyors verify pilot transfer arrangements during initial construction. Any changes in the approved configuration should be brought to the attention of the local Officer in Charge, Marine Inspection (OCMI) or the classification society surveyor, if applicable, in order to verify that the pilot transfer arrangement is in compliance with SOLAS Chapter V, Regulation 23.

Questions concerning this notice may be forwarded to Coast Guard Office of Commercial Vessel Compliance, Flag State Control Division (CG-CVC-4) at FlagStateControl@uscg.mil.

-uscg-

Pilot ladder / manropes must be rigged through the trapdoor to at least the height of the handrail



Platform must be secured to ship's side

Steps must rest firmly against ship's side

