

*BOPC RECEIVED  
12-8-2021*

# SAFETY CAMPAIGN



2021



# INTRODUCTION

## CONTENTS

- 2 Beliefs
- 3 Foreword
- 4 Participants
- 5 Vessel Type
- 6 Means of Transfer
- 7-9 Non-Compliance  
by Type of Defect
- 10 Required Boarding  
Arrangements for  
Pilot
- 11 IMPA Officers  
and Secretariat

IMPA represents the international community of pilots. We use the resources of our membership to promote effective safety outcomes in pilotage as an essential public service.

## BELIEFS

- 1 The public interest is best served by a fully regulated and cohesive pilotage service free of commercial pressure.
- 2 There is no substitute for the presence of a qualified pilot on the bridge.
- 3 IMO is the prime authority in matters concerning safety of international shipping.
- 4 All states should adopt a responsible approach based on proven safety strategies in establishing their own regulations, standards and procedures with respect to pilotage.
- 5 Existing and emerging information technologies are capable of enhancing on-board decision making by the maritime pilot.

## IMPA Safety Survey 2021

**The 2021 Annual IMPA Pilot Ladder Survey again highlights persistent non-compliance with SOLAS Regulations V/23 and associated supporting IMO Assembly Resolutions.**

During 2021, the maritime industry has shown tremendous fortitude and resilience in operating when faced with Coronavirus pandemic.

Vessels have rapidly introduced justifiable precautions when the health and safety of their crews has been threatened, and these justifiable measures have been maintained throughout this challenging period. It is a credit to the industry that the introduction of such safety measures is so complete that it is now seen as normal procedures to socially distance, wear face masks and to sanitise your hands frequently. The ready adoption of such safety measures has allowed mariners to operate safely, keeping open supply chains while many other parts of society have been locked down.

In contrast to rapid implementation of new biosecurity measures, IMPA regrettably has to report that high levels of non-compliance with long established SOLAS regulations remain broadly in line with previous surveys. Progress is not happening. Still pilots are being injured and still lives are being lost during pilot transfer operations.

Whenever you go on a vessel you are met with a multitude of posters promoting safe practices, such as enhanced PPE etc... Yet still pilot ladders and pilot transfer arrangements are offered in a poor state or incorrectly rigged. As with biosecurity, there needs to be a sea-change in safety culture regarding pilot boarding arrangements, recognizing that accidents can cause serious injuries or fatalities. This safety culture needs to be generated on the vessels themselves. The ships crews can only work with the material they are given, so owners need to ensure that the ladders comply with agreed industry standards SOLAS and ISO 799, and that crews are properly trained in their deployment under the supervision of a responsible officer.

Pilots are not idly standing by waiting for the issue to resolve itself. Social media is being used to share photographs and details of non-compliant vessels. Pilots are becoming more aware of the issue and many are refusing to use non-compliant arrangements. Often when a ladder is refused due to its poor state, a compliant 'spare' ladder, that is normally saved for inspections, is miraculously retrieved for use to avoid delays. Many national pilot organizations have now developed their own apps, which allow pilots to report deficiencies. The reports are simultaneously sent to the national pilot organization, port authorities and port state control. This information can easily be shared with other pilotage organizations. A vessel should not be surprised to find that if they have a deficient ladder, for that deficiency to be relayed to the port state control inspector and pilots at their next port, before they arrive. If you think the cost of a compliant pilot transfer arrangement is expensive, compare it with the cost of a delayed berthing or even a diversion to another port.

Nobody should face the risk of serious injury or loss of life when going to work. Pilotage services are provided around the world to promote the safety of shipping and assist the ships during the most hazardous part of their voyage. The very least that the pilot should expect is a boarding arrangement that is safe to use. It is now the norm for a pilot having had to climb a dangerous non-compliant ladder to be faced with a request to sanitise his hands upon reaching the deck. The irony is not lost on pilots.

If the same fortitude to introducing biosecurity measures was used to uphold current SOLAS Regulations, the issue of non-compliant pilot transfer arrangements would be seriously diminished.

IMPA warmly welcomes Concentrated Inspection Campaigns (CIC) from some flag states and other NGOs. It demonstrates that within the industry the issue is being recognised and they are prepared to take steps to resolve the problem. IMPA sincerely hopes that these efforts will produce significant improvements in the future.





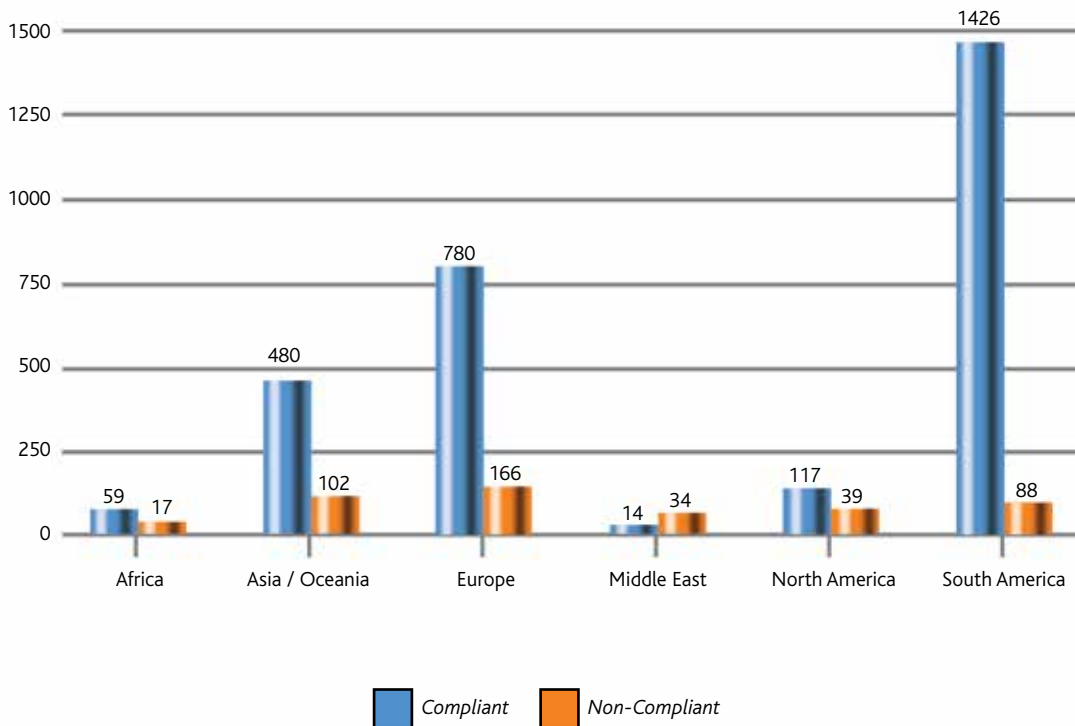
# PARTICIPANTS

The chart below shows 3,322 returns from participating IMPA members which have been grouped into 6 geographical areas.

| COUNTRY        | TOTAL RETURNS | COMPLIANT   | NON COMPLIANT | NON COMPLIANT AS % |
|----------------|---------------|-------------|---------------|--------------------|
| Africa         | 76            | 59          | 17            | 22.37              |
| Asia / Oceania | 582           | 480         | 102           | 17.53              |
| Europe         | 946           | 780         | 166           | 17.55              |
| Middle East    | 48            | 14          | 34            | 70.83              |
| North America  | 156           | 117         | 39            | 25.00              |
| South America  | 1514          | 1426        | 88            | 5.81               |
| <b>TOTAL</b>   | <b>3322</b>   | <b>2876</b> | <b>446</b>    | <b>13.43</b>       |



## COMPLIANCE AND NON-COMPLIANCE BY REGION



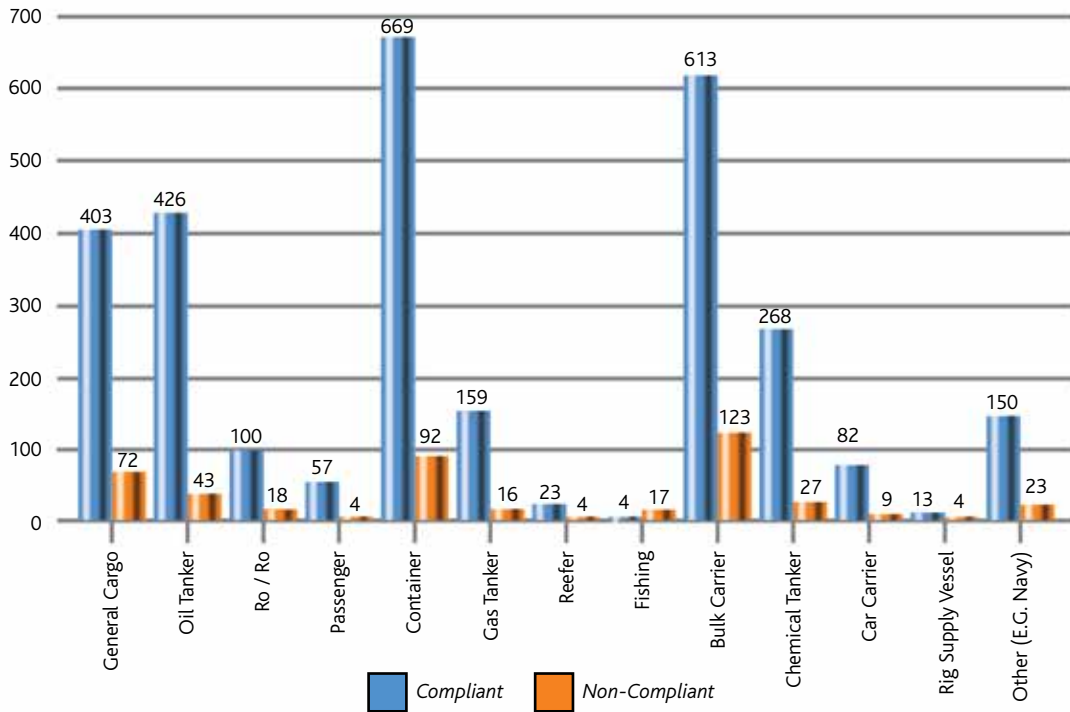
# VESSEL TYPE

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

| VESSEL TYPE       | TOTAL NUMBER OF VESSELS | COMPLIANT | NON COMPLIANT | NON COMPLIANT AS % |
|-------------------|-------------------------|-----------|---------------|--------------------|
| General Cargo     | 475                     | 403       | 72            | 15.16              |
| Oil Tanker        | 469                     | 426       | 43            | 9.17               |
| Ro/Ro             | 118                     | 100       | 18            | 15.25              |
| Passenger         | 61                      | 57        | 4             | 6.56               |
| Container         | 761                     | 669       | 92            | 12.09              |
| Gas Tanker        | 175                     | 159       | 16            | 9.14               |
| Reefer            | 27                      | 23        | 4             | 14.81              |
| Fishing           | 21                      | 4         | 17            | 80.95              |
| Bulkcarrier       | 736                     | 613       | 123           | 16.71              |
| Chemical Tanker   | 295                     | 268       | 27            | 9.15               |
| Car Carrier       | 91                      | 82        | 9             | 9.89               |
| Rig Supply Vessel | 17                      | 13        | 4             | 23.53              |
| Other (E.G. Navy) | 173                     | 150       | 23            | 13.29              |



COMPLIANCE AND NON-COMPLIANCE BY VESSEL TYPE





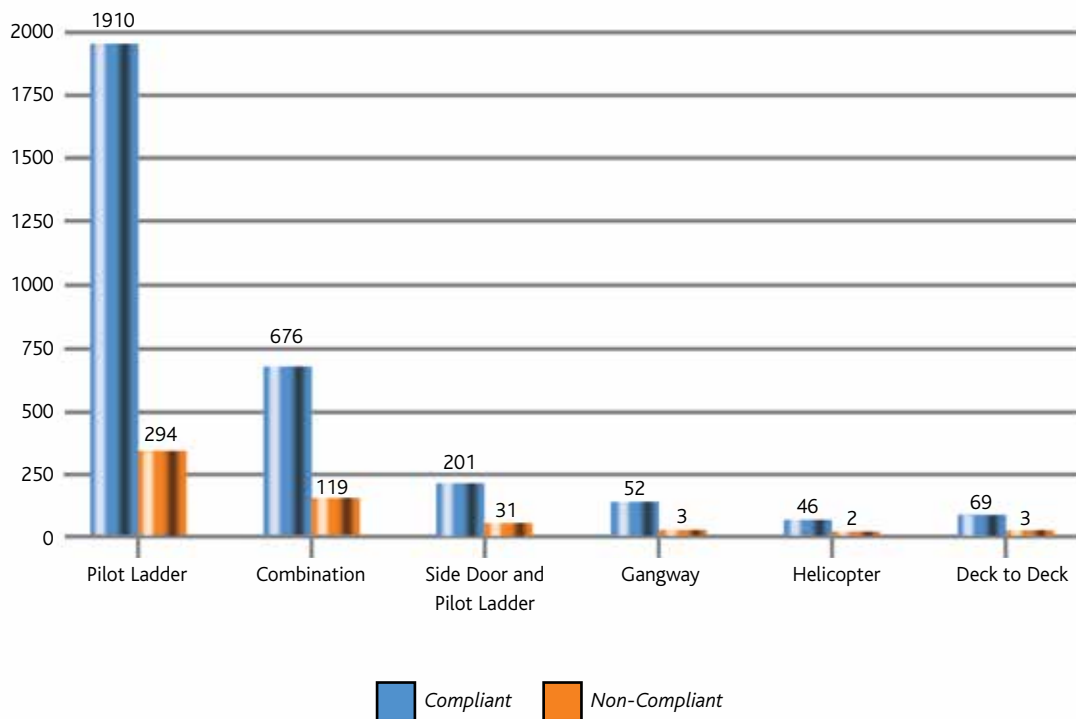
# MEANS OF TRANSFER

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

| MEANS OF TRANSFER          | TOTAL NUMBER | COMPLIANT | NON COMPLIANT | NON COMPLIANT AS % |
|----------------------------|--------------|-----------|---------------|--------------------|
| Pilot Ladder               | 2204         | 1910      | 294           | 13.34              |
| Combination                | 795          | 676       | 119           | 14.97              |
| Side Door and Pilot Ladder | 232          | 201       | 31            | 13.36              |
| Gangway                    | 55           | 52        | 3             | 5.45               |
| Helicopter                 | 48           | 46        | 2             | 4.17               |
| Deck to Deck               | 72           | 69        | 3             | 4.17               |



## COMPLIANCE AND NON-COMPLIANCE BY MEANS OF TRANSFER





# NON-COMPLIANCE BY TYPE OF DEFECT

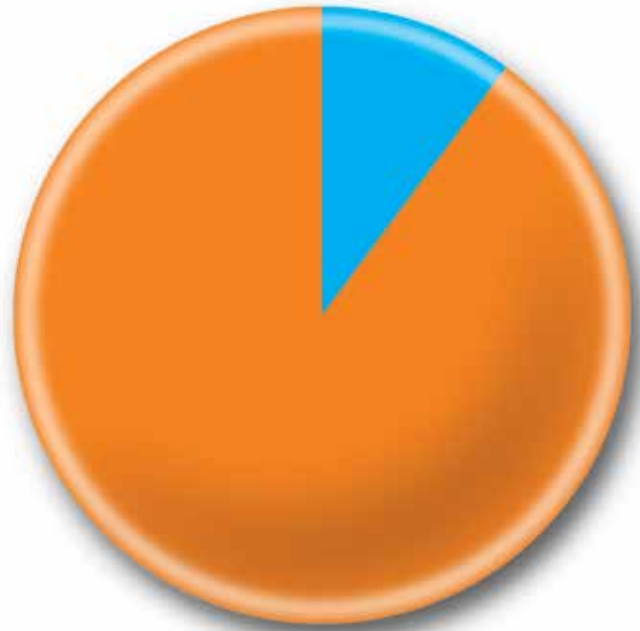
The first pie chart shows the percentage of the defects that were reported and not reported to the Authority. The second pie chart shows non-compliance by type of defect. Both the number and percentage are shown.

**DEFECTS REPORTED TO AUTHORITY**

|   |            |
|---|------------|
| <b>TOTAL NUMBER OF NON-COMPLIANT SHIPS IN SURVEY REPORTED</b> | <b>446</b> |
| Number of defects reported to Authority                       | 46         |
| % of non-compliant ships reported                             | 10.31      |
| % of non-compliant ships not reported                         | 89.69      |


*% of non-compliant ships reported* 


*% of non-compliant ships not reported* 





**NON-COMPLIANCE BY TYPE OF DEFECT**

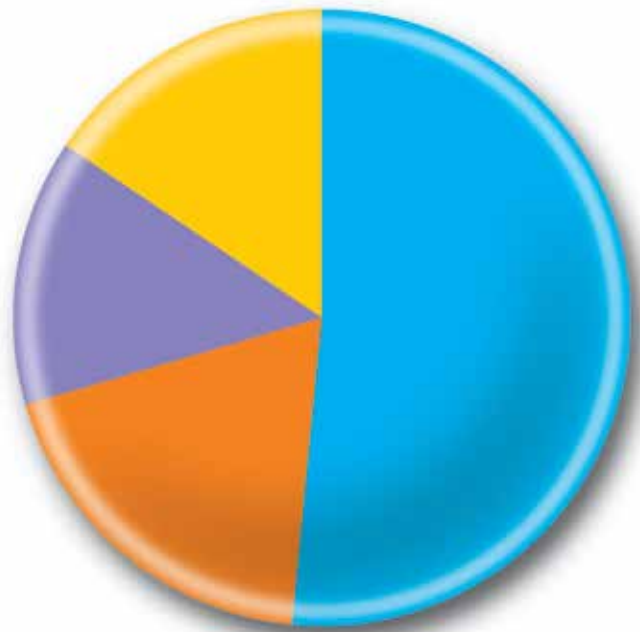
| <b>NON-COMPLIANT BY TYPE OF DEFECT</b> | <b>TOTAL</b> | <b>AS %</b> |
|--|--------------|-------------|
| Pilot ladder                           | 310          | 51.32       |
| Bulwark/Deck                           | 116          | 19.21       |
| Combination                            | 82           | 13.58       |
| Safety Equipment                       | 96           | 15.89       |
| <b>TOTAL</b>                           | <b>604</b>   |             |

*Pilot Ladder* 

*Bulwark/Deck* 

*Combination* 

*Safety Equipment* 



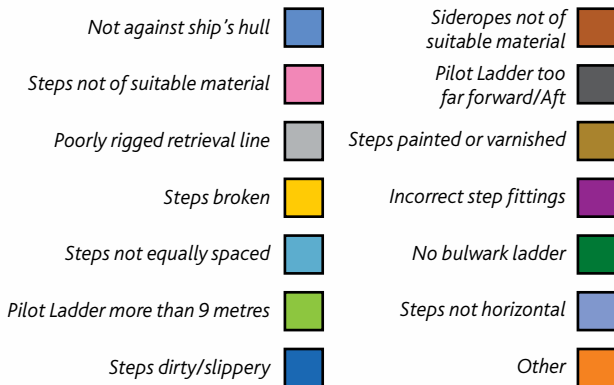
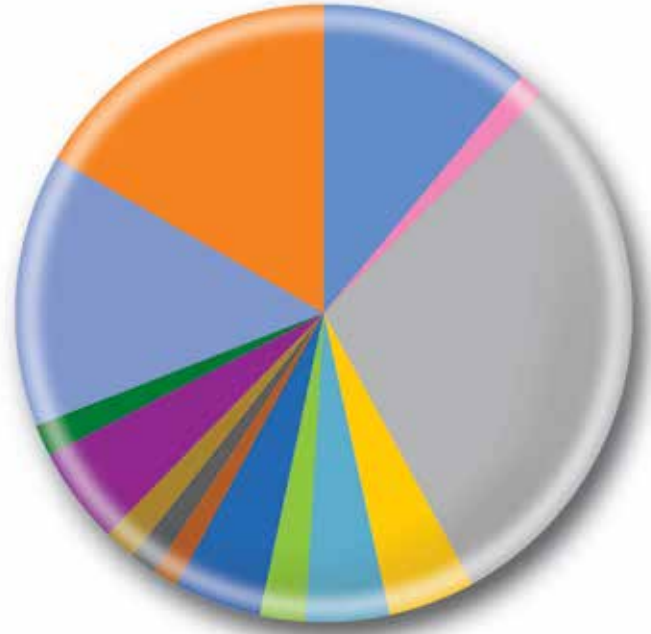


# NON-COMPLIANCE BY TYPE OF DEFECT

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

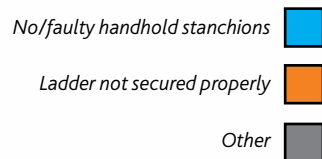
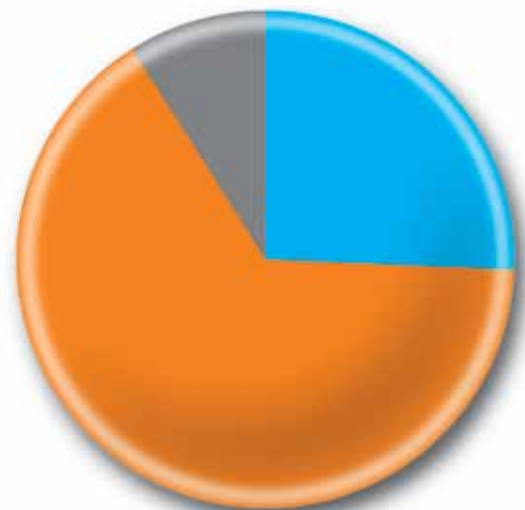
| DEFECTS OF PILOT LADDER            | TOTAL      | AS %  |
|------------------------------------|------------|-------|
| Not against ship's hull            | 47         | 11.22 |
| Steps not of suitable material     | 5          | 1.19  |
| Poorly rigged retrieval line       | 125        | 29.83 |
| Steps broken                       | 18         | 4.3   |
| Steps not equally spaced           | 19         | 4.53  |
| Pilot Ladder more than 9 metres    | 9          | 2.15  |
| Steps dirty/slippery               | 19         | 4.53  |
| Sideropes not of suitable material | 5          | 1.19  |
| Pilot Ladder too far forward/Aft   | 7          | 1.67  |
| Steps painted or varnished         | 6          | 1.43  |
| Incorrect step fittings            | 22         | 5.25  |
| No bulwark ladder                  | 6          | 1.43  |
| Steps not horizontal               | 60         | 14.32 |
| Other                              | 71         | 16.95 |
| <b>TOTAL</b>                       | <b>419</b> |       |

DEFECTS OF PILOT LADDER



| DEFECTS OF BULWARK / DECK     | TOTAL      | AS %  |
|-------------------------------|------------|-------|
| No/faulty handhold stanchions | 34         | 25.56 |
| Ladder not secured properly   | 87         | 65.41 |
| Other                         | 12         | 9.02  |
| <b>TOTAL</b>                  | <b>133</b> |       |

DEFECTS OF BULWARK / DECK

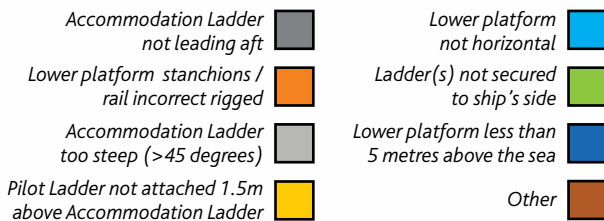




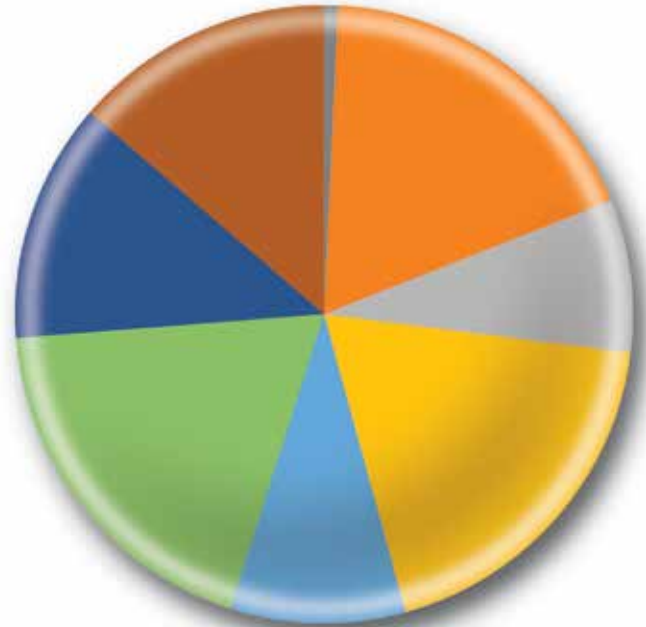
# NON-COMPLIANCE BY TYPE OF DEFECT

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

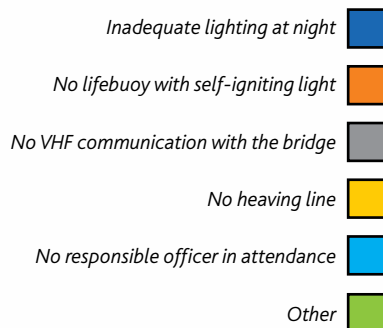
| COMBINATION DEFECTS                                       | TOTAL      | AS %  |
|---|------------|-------|
| Accommodation Ladder not leading aft                      | 1          | 0.65  |
| Lower platform stanchions / rail incorrect rigged         | 28         | 18.3  |
| Accommodation ladder too steep (>45 degrees)              | 12         | 7.84  |
| Pilot Ladder not attached 1.5m above Accommodation Ladder | 29         | 18.95 |
| Lower platform not horizontal                             | 14         | 9.15  |
| Ladder(s) not secured to ship's side                      | 29         | 18.95 |
| Lower platform less than 5 metres above the sea           | 19         | 12.42 |
| Other   | 21         | 13.73 |
| <b>TOTAL</b>  | <b>153</b> |       |



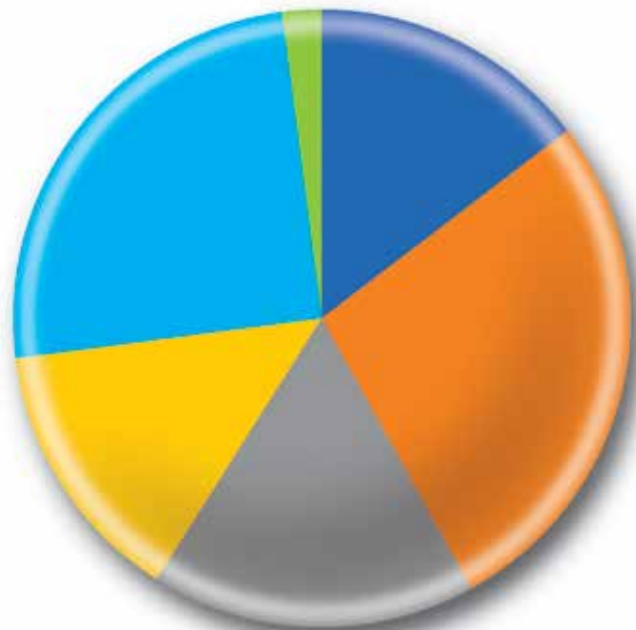
COMBINATION DEFECTS



| SAFETY EQUIPMENT DEFECTS             | TOTAL      | AS %  |
|--------------------------------------|------------|-------|
| Inadequate lighting at night         | 22         | 14.47 |
| No lifebuoy with self-igniting light | 42         | 27.63 |
| No VHF communication with the bridge | 26         | 17.11 |
| No heaving line                      | 21         | 13.82 |
| No responsible officer in attendance | 38         | 25    |
| Other                                | 3          | 1.97  |
| <b>TOTAL</b>                         | <b>152</b> |       |



SAFETY EQUIPMENT DEFECTS



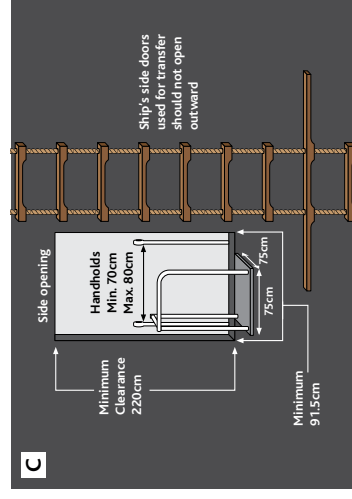
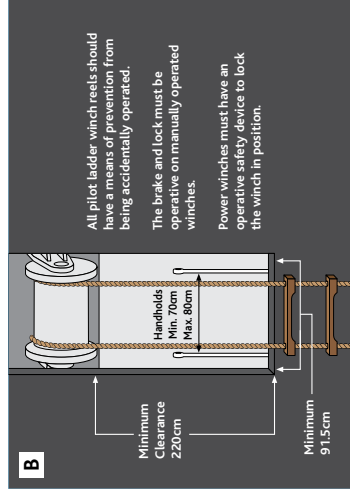
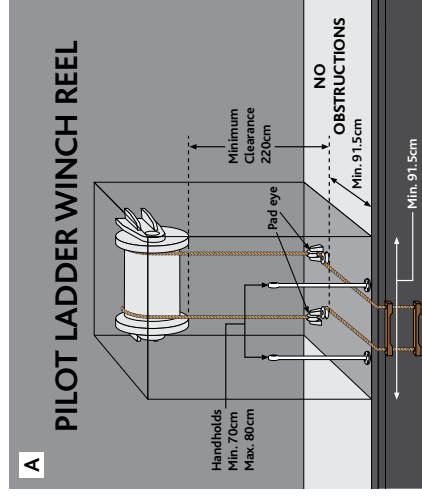
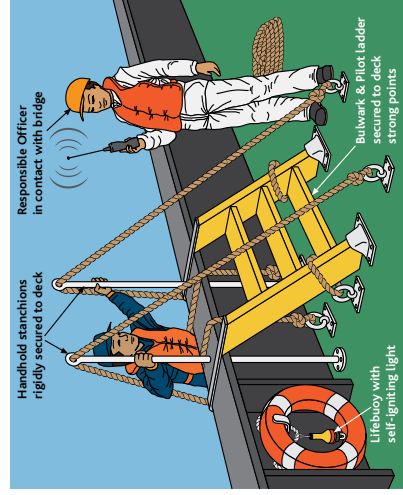
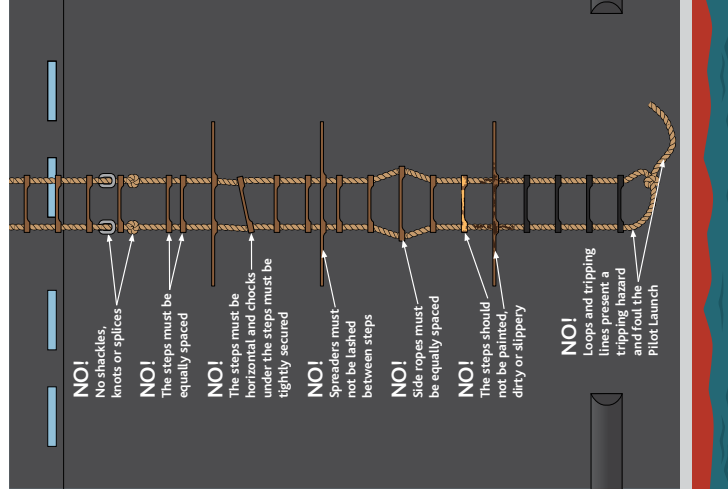
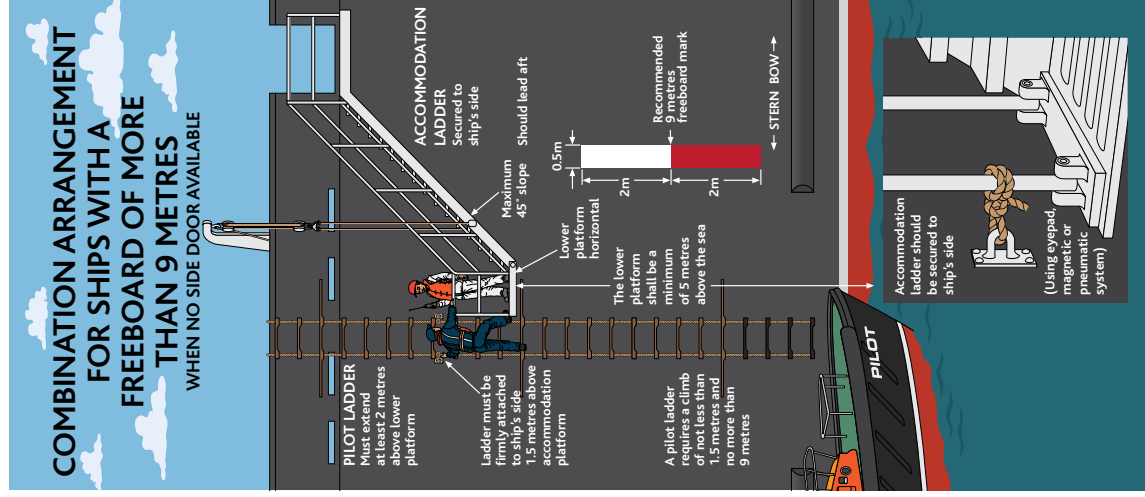
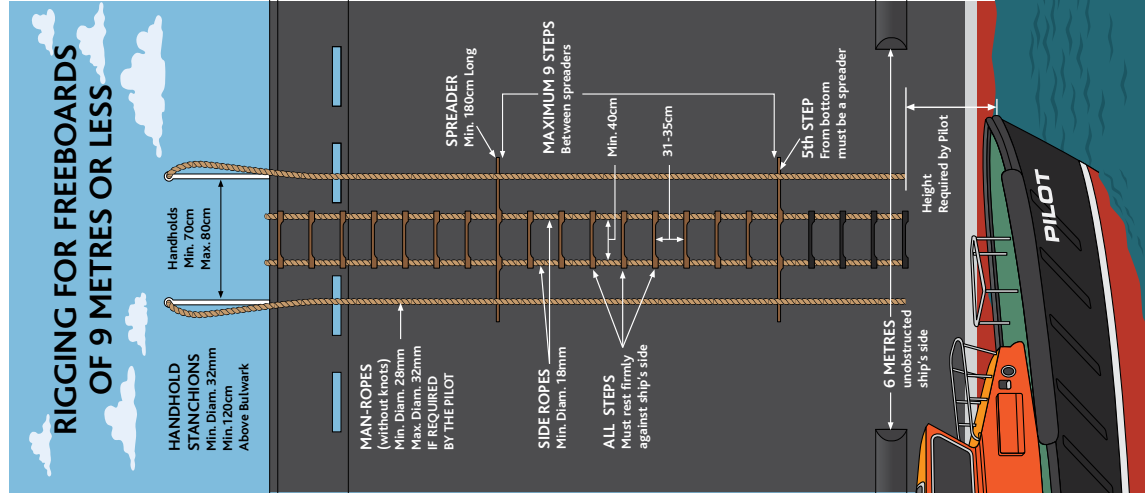
# REQUIRED BOARDING ARRANGEMENTS FOR PILOT



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

INTERNATIONAL MARITIME PILOTS' ASSOCIATION

H.Q.S. "Wellington" Temple Stairs, Victoria Embankment, London WC2R 2PN Tel: +44 (0)20 7240 3973 Email: office@impahq.org  
 This document and all IMO Pilot-related documents are available for download at: <http://www.impahq.org>



# THE INTERNATIONAL MARITIME PILOT'S ASSOCIATION

## IMPA OFFICERS

### President

Captain Simon Pelletier - Canada

### Senior Vice President / Treasurer

Captain Jean-Philippe Casanova - France

### Vice Presidents

Captain Alvaro Moreno - Panama

Captain Choi, Yeong Sig - Korea

Captain John Pearn - UK

Captain Oumar Dramé - Senegal

Captain Ricardo Falcão - Brazil

## IMPA SECRETARIAT

### Secretary General

Nick Cutmore

### Relationship & Operations Manager

Eliane Blanch



**International Maritime Pilots' Association (IMPA)**

HQS Wellington, Temple Stairs, Victoria Embankment, London WC2R 2PN

Telephone: +44 20 7240 3973

Email: [office@impahq.org](mailto:office@impahq.org) Website: [www.impahq.org](http://www.impahq.org)