



## Updated guidance on pilot transfer arrangements

The International Chamber of Shipping (ICS) and the International Maritime Pilots Association (IMPA) recently published an updated version of their 'Shipping Industry Guidance on Pilot Transfer Arrangements' in an effort to make pilot transfer arrangements safer.

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Embarking and disembarking of pilots is a perilous activity. Any accident can cause severe injuries to the pilot or even fatalities. One of the go-to guides on pilot transfer arrangements has been the ICS and IMPA's publication ['Shipping Industry Guidance on Pilot Transfer Arrangements'](#). In January 2022, they published version 3 of this guide. Below we highlight what is new in this latest edition, and briefly look at the results of the last year's survey on pilot ladder safety conducted by the IMPA.

### **What is new in 'Version 3' of the Guidance?**

The updated version of *'Shipping Industry Guidance on Pilot Transfer Arrangements'* includes a new section on combination embarkation platform arrangements where rigging and minimum size of opening of 'trapdoor arrangements' are covered.

### **What is a trapdoor arrangement?**

Some vessels may have a trapdoor arrangement installed onboard instead of the conventional combination arrangement. Both arrangements require the pilot to make a transition between a vertically hanging pilot ladder and an aluminium accommodation ladder. In a trapdoor arrangement however, the transition is through an opening in the lower platform of the accommodation ladder which adds element of a risk for the pilot, as discussed below.

'Trapdoor' arrangements on vessels built before 2012

SOLAS, Chapter V, Reg. 23 requires that the pilot ladder be secured to the ship side at a point 1.5 metres above the bottom platform of the accommodation ladder. If the ship is equipped with a trapdoor arrangement on the bottom platform, the pilot ladder alongwith the man ropes should also be rigged through the trapdoor extending above the platform to the height of the handrails.

Vessels built prior to 2012 however, do not need to comply with this requirement. Pilots in certain states have reportedly refused to board such older vessels if their trapdoor arrangements do not comply with the current SOLAS requirements for pilot transfer arrangements, notwithstanding the fact that these older vessels may have the required Class and Flag approvals in place for their existing arrangements.

A pilot ladder hanging from a cross beam near the bottom of the platform (see image on the left below) is a typical example of an unsafe transition through the trapdoor arrangements reported by various pilot associations:

- It makes the transition from the pilot ladder onto the accommodation ladder difficult due to uneven step height;
- Pilots cannot make use of the side ropes to make the transition and instead have to use the cross beam and the stanchions for support when embarking and disembarking; and
- The pilot ladder is not secured to the side of the hull.

An example of a combination arrangement using trapdoor arrangement complying with current SOLAS regulations is shown in the image on the right below.

*Left: One example of a trapdoor arrangement deemed unsafe by pilots in some ports. Pilot ladder secured to the beam of the trapdoor and not extending above the platform.*

*Right: Photograph of a trapdoor arrangement complying with current SOLAS regulations.*

### **Summary of IMPA's survey for 2021**

IMPA's [annual pilot ladder survey for 2021](#) showed that 13% of pilot transfer arrangements reported by its members were non-compliant with SOLAS regulation V/23. Most of the non-compliances reported were with combination arrangements and pilot ladders.

Top three shortcomings related to combination arrangements were:

- Pilot ladder not attached 1.5m above accommodation ladder.
- Ladders not secured to ship side.
- Lower platform stanchions/rail incorrectly rigged.

For pilot ladders, the top three shortcomings were:

- Poorly rigged retrieval line.
- Steps not horizontal.
- Ladder not resting against ship's hull.

Comparing the proportion of non-compliances with surveys done in previous years it is apparent that there is a need to improve the awareness of pilot ladder safety amongst both crew and owners/managers.

### **Recommendations**

- Managers are reminded to check whether the pilot transfer arrangements on their vessels comply with SOLAS Chapter V and IMO Resolution A.1045(27) (as amended by A.1108(29)). There are many reference documents published by various pilot associations around the world, giving examples of safe and unsafe arrangements. You can find links to some of these documents at the end of this article.
- Particular attention should be paid to vessels with combination arrangements, especially those built prior to 2012 and with a trapdoor arrangement.
- Owners/managers of such older vessels may also wish to contact their local agents to know if local requirements will allow existing trapdoor arrangements to be used without modification.
- Those operating older vessels with trapdoor systems not complying with current SOLAS rules and regulations may wish to consider modifying them to the satisfaction of Class and Flag to avoid issues with pilots refusing to board and possibly also port state control.

### **Gard publications**

- [Don't forget about gangways and ladders](#)

### **Further reading**

- ICS and IMPA's [Shipping Industry Guidance on Pilot Transfer Arrangements, Third Edition](#)
- IMPA's [poster on boarding arrangements](#)
- IMPA's [Safety Campaign Results 2021](#)
- Guidance documents on trapdoor arrangements produced by pilot associations:
  - [New Zealand Maritime Pilot's Association](#)
  - [United Kingdom Maritime Pilots' Association](#)
  - [American Pilots' Association](#)

- [UKMPA's links on pilot boarding arrangements](#)
- [Norwegian Pilots' Association](#)
- [Poster on best practices for Pilot Boarding arrangements by AB Ports, UK](#)