



Don't forget about gangways and ladders

****Updated 1 March 2022**** In the aftermath of a fall incident in 2018, leading to the death of a ship's pilot, the US Coast Guard reminded stakeholders of the potential safety hazards associated with the use of gangways and ladders. The incident continues to serve as a useful reminder for ships' crews not to become complacent about such risks just because the equipment tend to be of a "simple design".

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On 21 August 2018, the United States (US) Coast Guard issued a Marine Safety Alert (type: asset-hyperlink id: bf6c9b2cb5854909809ede4782143d28) following the death of a ship's pilot. The pilot died while boarding a vessel when the gangway separated from the vessel, causing two people to fall into the water. The Coast Guard's intent was to warn mariners that shipboard equipment that may seem quite benign can quickly become a hazard to people if not properly maintained and operated.

Providing safe access to and from ships, between the ship and the shore or another ship alongside, is an integral part of ensuring a safe working environment onboard. The arrangements provided for boarding must be fit for purpose, comply with relevant standards and properly maintained. It is important that the means of access is inspected to ensure that it is safe to use after rigging and further checks should be carried out at regular intervals to ensure adjustments are made when necessary, e.g. due to tidal movements or change of trim and movements.

In order to avoid similar incidents in the future, the Coast Guard strongly recommends that vessel owners, operators, masters and crew review and implement industry best practices for boarding arrangements and comply with all applicable regulations. Vessel pilots, crews, vendors, and other people boarding or departing a vessel are also urged to take a moment to examine the gangway, accommodation or pilot ladder before accessing them, and look for potential hazards or deficiencies and report them to senior personnel on board the vessel.

Vessel boarding arrangements – best practices

Requirements for means of embarkation and disembarkation for use in port are set out in SOLAS regulation II-1/3-9 and in the associated guidelines found in type: asset-hyperlink id: 1c154e2d4b22402bb611a0fc5685643b. Pilot ladders are specifically dealt with in SOLAS Regulation V/23 and [IMO Resolution A.1045\(27\)](#). To ensure a practical approach and uniform enforcement of regulations governing health and safety risks, Maritime Administrations also publish useful codes of working practices (or similar documents).

- One such example is the UK “[Code of Safe Working Practices for Merchant Seamen](#)” (COSWP). Its aim is to provide guidance to shipowners and seafarers on how to fulfil their statutory obligations and Chapter 22 deals with details of boarding arrangements.
- Another example is the US’ [Occupational Safety and Health Administration](#) (OSHA) regulations.
- The ILO’s “[Code of practice for accident prevention on board ship at sea and in port](#)” provides similar practical recommendations and guidance.
- For pilot ladders specifically, additional information is also found in the “[Shipping Industry Guidance on Pilot Transfer Arrangements](#)” published by the International Maritime Pilots' Association (IMPA) and ICS as well as in the IMPA poster “[Required Boarding Arrangements for Pilot](#)”.

Non-compliant pilot ladders remain an industry challenge

Worldwide, day and night, pilots are required to board and disembark from all types of vessels in all types of weather in all seasons. Although the method of operation has changed very little over many generations, consistently a remarkably large percentage of vessels still fail to comply with the mandatory SOLAS requirements, according to IMPA. Statistics produced by its many surveys over the years demonstrate persistent non-compliance steadily remains between 10% and 20% – and 2021 is no different in that respect with 13% non-compliance recorded. Reference is made to IMPA’s [2021 annual ladder survey report](#) for more details.

Members and clients are therefore reminded of their responsibility to supply conforming pilot ladders and ship-borne fittings to all their vessels and to ensure that vessels’ crew members

involved in the transfer operations receive the necessary training. A full understanding of the risks involved and the requirements in force is essential in order to prevent accidents during pilot transfers.

See also our alert “[Updated guidance on pilot transfer arrangements](#)” of 14 February 2022.