Report on

The SAFETY CAMPAIGN 2009 for Pilots' Transfer

from 29th June to 3rd July, 2009

September 2009

JAPAN FEDERATION OF PILOTS' ASSOCIATIONS
Foreword

After 1991, the Japan Federation of Pilots’ Associations has held the "Safety Campaign for Pilot's Transfer" every year to secure the safety of pilots during their embarkation and disembarkation.

Regulation 23, Chapter V of the SOLAS Convention, which is an international compulsory rule on the arrangements and operations for pilots' transfer, has been revised and came into force on 1st July, 2002.

And in this year, the campaign was carried out for 5 days from 29th June to 3rd July in 35 pilotage districts and in other ports where licensed pilots serve. In the campaign, pilots checked 543 ships in accordance with Regulation 23.

JFPA publishes this paper to report on the results of the campaign to the members of JFPA and also to inform the persons concerned of the actual condition of arrangements for pilots' transfer. I hope this report is used as a reference when means for ensuring safe transfer of pilots are studied.

The conditions of transfer arrangements have been gradually improved through the campaigns held 19 times in the past. It has been indebted great deal to the cooperation rendered by the Ministry of Land, Infrastructure, Transport and Tourism, Japan Coast Guard, Japanese Shipowners’ Association, Japan Foreign Steamship Association, Ship's Agency Association of Japan, Japan Association of Foreign Ship Agencies and organizations concerned in each district as well as shipmasters and crew.

Taking this opportunity, I would like to express our sincere gratitude to all the persons concerned.

September, 2009.

Capt. Y. Ono
President
Japan Federation of Pilots' Associations
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I. Object of the Safety Campaign

When a pilot renders pilotage service, transferring between a ship and a pilot boat was involved in many accidents including the serious cases and seven pilots were killed from 2000 to 2009. Safe transfer is outstanding problem for pilots because, whenever a pilot is involved in an accident during transfer, not only his life but also the safety of the ship itself might be threatened by the possible inability to continue its navigation.

Considering this situation, each regional pilots' association has taken various safety measures. In parallel with this activity, JFPA has also been endeavoring to ensure the safe transfer of pilots.

For an accident such as a fall into the sea, pilots may be able to take better preventive measures, but they are obliged to depend on the actions of an individual ship for improvement of transfer arrangements and their operation. This means that pilots are placed in a position where they cannot secure their safety without understanding and cooperation of the crew of that ship.

From the above viewpoint, JFPA and the regional pilots' associations strengthened safety measures for pilots in each pilotage district. And, beside the measures, JFPA has held a nation-wide "Safety campaign for pilot's transfer" every year after 1991, requesting the crew members of all ships to have better understanding of the arrangements for pilot's transfer and their operation.
II. Details of the Safety Campaign

The safety campaign 2009 for pilot's transfer was carried out as follows:

1. Date and Place
   Date: For five days from 29th June to 3rd July, 2009.
   Place: 35 pilotage districts and other ports where licensed pilots serve.

2. Details of the Safety Campaign

2.1 Outline
   The main theme of the campaign was for the pilot who goes on board a ship to
   confirm the condition of transfer arrangements in accordance with Regulation 23, Chapter V
   of the SOLAS Convention.

   If a pilot found any offense in the transfer arrangements of a ship, he was to request
   the shipmaster to remedy it. If there was an especially serious offense in the
   arrangements and when a great danger was expected for pilot's transfer, the pilot was to
   defer embarkation temporarily.

   Beside above, he advised the shipmaster to remedy the transfer arrangement in
   accordance with the Recommendations by IMPA (International Maritime Pilots’ Association).

2.2 Previous publicity
   Same as last year, JFPA and each regional association requested the cooperation of
   the following parties, improving their knowledge prior to the campaign through letters and
   campaign posters.

   (1) The Ministry of Land, Infrastructure, Transport and Tourism (Maritime Bureau, each
       District transport Bureau and its branches, etc.)
   (2) Japan Coast Guard (Maritime Traffic Department, each Regional Coast Guard
       Headquarters, each Coast Guard Office, etc.)
   (3) Shipping Companies (through Japanese Shipowners’ Association, Japan Foreign
       Steamship Association, and shipowners' organization in each district)
   (4) Agents (through Ship’s Agency Association of Japan, Japan Association of Foreign Ship
       Agencies, and organizations concerned in each district)

2.3 Checking the transfer arrangements
   (1) Inspection standards
       ① Offenses
Arrangements for pilot's transfer were checked in accordance with Regulation 23, Chapter V of the SOLAS Convention (the New SOLAS). Arrangements and their operation that were in contravention of the regulation were pointed out as "offenses". Furthermore the ships which installed equipment before January 1st, 1994 were checked according to Regulation 17, Chapter V of the SOLAS Convention (the Old SOLAS).

Note: Improvement of arrangements and their operation in accordance with the Recommendations by IMPA were also advised to shipmasters with an additional remark as "Recommendations".

(2) Serious offenses

Following cases were defined as serious offenses:

- Though the distance from sea level to the point of access to the ship exceeds 9 m, only a pilot ladder is used.
- A pilot ladder which is not provided in SOLAS regulation (for example, a general service ladder) is used.
- A pilot ladder is not rigged on the flat side of the ship.
- No light is provided at night to illuminate the arrangements and the access point.
- No responsible officer is present at the access point.
- Besides, where it is recognized by a pilot that the arrangements are in contravention of the SOLAS Regulations and there is a great danger to pilot.

(2) Arrangements that were checked

The following arrangements and their operation, which are specified in the above regulation, were checked.

- Pilot ladder.
- Combination ladder (A transfer arrangement that combines a pilot ladder and an accommodation ladder)
- Mechanical pilot hoist

Note: Gangway ladder used for ship-shore transfer was excepted.

(3) Method of checking

The above arrangements were checked by a pilot who rendered the pilotage service, when he embarked or disembarked, using the "NOTICE TO SHIPMASTER" shown later. When a pilot found any offenses in the arrangements, he marked the appropriate figures in the sheet, entered the necessary explanation in the remark column, and requested the shipmaster to remedy the offended part or operation.
[NOTICE TO SHIPMASTER]

The Shipmaster is requested to take an immediate action for improvement of checked item(s) below. If no action is taken, pilot may refuse his service in accordance with Pilotage Agreement.

I.M.O. Requirements
(Items in frames are I.M.P.A. Recommendations)

<table>
<thead>
<tr>
<th>NO</th>
<th>PL is</th>
<th>Steps are</th>
<th>Side ropes are</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>PL is</td>
<td>clear from discharge</td>
<td>not of hardwood</td>
</tr>
<tr>
<td></td>
<td>Steps are</td>
<td>non slip surface</td>
<td>not less than 11mm deep</td>
</tr>
<tr>
<td></td>
<td>not of hardwood</td>
<td>less than 25mm thick</td>
<td>Escort by a safe route</td>
</tr>
</tbody>
</table>

RIGGING FOR FREEBOARDS OF 9 METRES OR LESS

- Handhold Stanchions
  - Max. diam.: 32mm
  - Above bulwark: min. 76cm, max. 80cm
  - If required, 2 sets

- Man Ropes
  - Min. diam.: 20mm

- Spreader
  - Min. 180cm long

SHIPS WITH HIGH FREEBOARD (MORE THAN 9M)

- When no side door available

- Officer in contact with bridge
- PL must extend at least 2m above/lower platform
- PL to rest firmly against ship's side
- Placing ladder
  - Enhance security
  - Wired firmly

MECHANICAL PILOT HOIST

- Two man ropes ready for immediate use
  - Min. diam.: 20mm

- A pilot ladder combined with an accommodation ladder is equally the safer method of embarking or disembarking a pilot on ships with a freeboard of more than 9 meters

- A pilot ladder must be rigged in accordance with SOLAS Chapter V, together with a PL ladder

- No handhold stanchions rigidly secured to ship's structure

- No handhold stanchions rigidly secured to ship's structure

AT NIGHT

- PL and ship's deck light forward shining overside light

CONDITIONS

- Old SOLAS
- New SOLAS
- Embarking
- Disembarking
- Under 9m
- Over 9m
- Unknown

EQUIPMENT

- PL
- Combination
- Hoist
- No Fault
- Faults were found, and
- Serious Faults are:
  - Height exceeds 9m, PL is used
  - Unformal PL is used
  - JPL is on rounded ship side
  - No light
  - No responsible officer
  - Other serious fault

REMARKS:

To Shipmaster of: (Ship's Name) Pilot's Name

Flag: GT Date: Pilotage District:
III. Results of the Safety Campaign

1. Results of Checking the Transfer Arrangements

For 543 ships checked during the safety campaign (488 ships were to be applied to New SOLAS), the circumstances at the time of the checking were as follows:

1.1 Circumstances when arrangements were checked

(1) When the pilot checked arrangements.
- At the time of embarkation: 355 ships
- At the time of disembarkation: 138 ships
- Unknown: 50 ships

(2) Height to access point
- 9m or less: 403 ships
- More than 9 m: 110 ships
- Unknown: 30 ships

1.2 Number of offenses

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Number</th>
<th>Offended Ships (Offense Rate)</th>
<th>Serious Offenses (Offense Rate)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1991</td>
<td>1,273 Ships</td>
<td>176 (13.8%)</td>
<td>54 (4.2%)</td>
</tr>
<tr>
<td>1992</td>
<td>1,403</td>
<td>189 (13.5)</td>
<td>31 (2.2)</td>
</tr>
<tr>
<td>1993</td>
<td>1,310</td>
<td>151 (11.5)</td>
<td>39 (2.7)</td>
</tr>
<tr>
<td>1994</td>
<td>1,311</td>
<td>126 (9.6)</td>
<td>29 (2.2)</td>
</tr>
<tr>
<td>1995</td>
<td>1,103</td>
<td>99 (9.0)</td>
<td>22 (2.0)</td>
</tr>
<tr>
<td>1996</td>
<td>1,295</td>
<td>128 (9.9)</td>
<td>30 (2.3)</td>
</tr>
<tr>
<td>1997</td>
<td>1,103</td>
<td>86 (7.8)</td>
<td>16 (1.5)</td>
</tr>
<tr>
<td>1998</td>
<td>984</td>
<td>67 (6.8)</td>
<td>12 (1.2)</td>
</tr>
<tr>
<td>1999</td>
<td>926</td>
<td>44 (4.8)</td>
<td>10 (1.1)</td>
</tr>
<tr>
<td>2000</td>
<td>796</td>
<td>46 (5.8)</td>
<td>13 (1.6)</td>
</tr>
<tr>
<td>2001</td>
<td>729</td>
<td>31 (4.3)</td>
<td>10 (1.4)</td>
</tr>
<tr>
<td>2002</td>
<td>785</td>
<td>35 (4.5)</td>
<td>10 (1.3)</td>
</tr>
<tr>
<td>2003</td>
<td>643</td>
<td>29 (4.5)</td>
<td>6 (0.9)</td>
</tr>
<tr>
<td>2004</td>
<td>875</td>
<td>35 (4.0)</td>
<td>10 (1.1)</td>
</tr>
<tr>
<td>2005</td>
<td>841</td>
<td>19 (2.3)</td>
<td>8 (1.0)</td>
</tr>
<tr>
<td>2006</td>
<td>835</td>
<td>28 (3.4)</td>
<td>6 (0.7)</td>
</tr>
<tr>
<td>2007</td>
<td>734</td>
<td>18 (2.5)</td>
<td>6 (0.8)</td>
</tr>
<tr>
<td>2008</td>
<td>674</td>
<td>13 (1.9)</td>
<td>6 (0.9)</td>
</tr>
</tbody>
</table>
Of 5 ships (13 ships during the campaign in 2008) that were regarded as those offended, 2 (6) ships had serious offenses. Of these ships, no ship was reported to need thorough repairs among ships listed as "Ships which need attentions for its transfer arrangements".

1.3 Transition of offense rate

1.4 Breakdown by flags

The above 5 offended ships were tabled by their flags as follows;

<table>
<thead>
<tr>
<th>No.</th>
<th>Flag State</th>
<th>2007</th>
<th>2008</th>
<th>2009</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Bahamas</td>
<td>0 / 38</td>
<td>1 / 29</td>
<td>0 / 29</td>
</tr>
<tr>
<td>2</td>
<td>China</td>
<td>2 / 49</td>
<td>0 / 58</td>
<td>1 / 50</td>
</tr>
<tr>
<td>3</td>
<td>Germany</td>
<td>0 / 9</td>
<td>0 / 15</td>
<td>1 / 27</td>
</tr>
<tr>
<td>4</td>
<td>Japan</td>
<td>0 / 28</td>
<td>0 / 23</td>
<td>0 / 13</td>
</tr>
<tr>
<td>5</td>
<td>Liberia</td>
<td>1 / 46</td>
<td>0 / 50</td>
<td>1 / 51</td>
</tr>
<tr>
<td>6</td>
<td>Marshall Islands</td>
<td>0 / 34</td>
<td>0 / 22</td>
<td>0 / 23</td>
</tr>
<tr>
<td>7</td>
<td>Panama</td>
<td>7 / 340</td>
<td>7 / 297</td>
<td>1 / 222</td>
</tr>
<tr>
<td>8</td>
<td>Philippines</td>
<td>0 / 11</td>
<td>0 / 6</td>
<td>0 / 10</td>
</tr>
</tbody>
</table>
1.5 Number of offenses by the type of arrangements

Among 5 ships (13 ships in 2008) that regarded as those offended, No ships had more than one offense. Therefore, the number of offenses totaled 5 (17).

This number is broken down as follows;

(1) Common items

(No lifebuoy/responsible officer/lighting/safe points of access/communication/safe route)

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Number</th>
<th>Number of offended</th>
<th>Number of offense</th>
<th>Offense Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>796 Ships</td>
<td>17 Ships [ 21 Offenses]</td>
<td>2.1%</td>
<td></td>
</tr>
<tr>
<td>2001</td>
<td>729</td>
<td>15 Ships [ 19 ]</td>
<td>2.1</td>
<td></td>
</tr>
<tr>
<td>2002</td>
<td>785</td>
<td>17 Ships [ 19 ]</td>
<td>2.2</td>
<td></td>
</tr>
<tr>
<td>2003</td>
<td>643</td>
<td>15 Ships [ 15 ]</td>
<td>2.3</td>
<td></td>
</tr>
<tr>
<td>2004</td>
<td>875</td>
<td>19 Ships [ 19 ]</td>
<td>2.2</td>
<td></td>
</tr>
<tr>
<td>2005</td>
<td>841</td>
<td>10 Ships [ 10 ]</td>
<td>1.2</td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td>835</td>
<td>8 Ships [ 8 ]</td>
<td>1.0</td>
<td></td>
</tr>
<tr>
<td>2007</td>
<td>734</td>
<td>8 Ships [ 8 ]</td>
<td>1.1</td>
<td></td>
</tr>
<tr>
<td>2008</td>
<td>674</td>
<td>5 Ships [ 6 ]</td>
<td>0.7</td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>543</td>
<td>3 Ships [ 3 ]</td>
<td>0.6</td>
<td></td>
</tr>
</tbody>
</table>

(2) By the type of transfer arrangements

<table>
<thead>
<tr>
<th>Year</th>
<th>Total Number</th>
<th>Number of offended</th>
<th>Number of offense</th>
<th>Offense Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>2000</td>
<td>796 Ships</td>
<td>33 Ships [ 39 Offenses]</td>
<td>4.1%</td>
<td></td>
</tr>
<tr>
<td>2001</td>
<td>729</td>
<td>16 [ 16 ]</td>
<td>2.2</td>
<td></td>
</tr>
<tr>
<td>2002</td>
<td>785</td>
<td>20 [ 25 ]</td>
<td>2.5</td>
<td></td>
</tr>
<tr>
<td>2003</td>
<td>643</td>
<td>15 [ 15 ]</td>
<td>2.3</td>
<td></td>
</tr>
<tr>
<td>2004</td>
<td>875</td>
<td>23 [ 25 ]</td>
<td>2.6</td>
<td></td>
</tr>
<tr>
<td>2006</td>
<td>835</td>
<td>20 [ 22 ]</td>
<td>2.4</td>
<td></td>
</tr>
<tr>
<td>2008</td>
<td>674</td>
<td>10 [ 12 ]</td>
<td>1.5</td>
<td></td>
</tr>
<tr>
<td>2009</td>
<td>543</td>
<td>2 [ 2 ]</td>
<td>0.4</td>
<td></td>
</tr>
<tr>
<td>① Pilot ladder</td>
<td>370</td>
<td>3 [ 3 ]</td>
<td>0.8</td>
<td></td>
</tr>
</tbody>
</table>
2 Combination ladder  136   2   [ 2 ]  1.5
3 Pilot hoist   2   0   [ 0 ]  0.0
1 Arrangement
unknown   35

Offense in the part of pilot ladder of "② Combination ladder" and "④ Arrangement unknown" above were gathered in offense of "① pilot ladder".

1.6 Details of offenses by the type of arrangements

Total offenses of "(1) Common items" and "(2) ① to ④" in 1.5 was calculated as 5 and these offenses were broken down as follows;

(1) Common Items ( Mark " * " shows offense against new SOLAS. )
① No lifebuoy with self-igniting light was arranged. 1 ( 1)
② No responsible officer was present. 2 ( 3)
③ No lighting was provided at night, or lighting was insufficient. 0 ( 0)
④ No Safe points of access to the ship was ensured. 0 ( 0)
*⑤ No means of communication between the responsible officer and the navigating bridge was arranged. 0 ( 0)
*⑥ No escort by a safe route was arranged. 0 ( 1)

(2) Pilot ladder
① Pilot ladder itself was offended. 0 ( 5)
  • Material of steps was improper. 0 ( 0)
  • Step was not horizontal. 0 ( 1)
  • Vertical spacing of steps was improper. 0 ( 0)
  • Steps were broken. 0 ( 1)
  • Steps were not fixed firmly. 0 ( 1)
  • Steps were not fixed firmly to the side ropes. 0 ( 0)
  • Size or material of side ropes were improper. 2 ( 0)
  • Pilot ladder was deteriorated, or very badly maintained. 0 ( 0)
② Spreaders were offended. 0 ( 0)
  • Spreaders were broken. 0 ( 0)
③ Bulwark ladder was offended. 0 ( 0)
  • Bulwark ladder was not fixed firmly. 0 ( 0)
④ Handhold stanchions were offended. 0 ( 0)
  • Size or fitting condition of stanchions was improper. 0 ( 0)
  • No stanchion was provided. 0 ( 0)
⑤ Though the distance from sea level to the point of access
to the ship exceeded 9 m, only a pilot ladder was used. 0 (2)

- Man ropes were not provided, or their size or material were improper. 1 (1)

- Pilot ladder was rigged at an improper place. 0 (3)
  - Ship's side was not flat, and ladder was not rest firmly against ship's side. 0 (2)
  - Pilot ladder was near to discharge. 0 (1)

- Fitting condition of pilot ladder was improper. 0 (0)

* Pilot ladder which is not provided in SOLAS regulation (general service ladder, etc.) was used. 0 (1)

- No heaving line was provided. 0 (0)

(3) Combination ladder 1 (0)

- Ship’s side was not flat, and accommodation ladder was not rest firmly. 1 (0)

- Accommodation ladder was very badly maintained. 0 (0)

- No pilot ladder was arranged. 0 (0)

- Accommodation ladder on lee side of the ship was not available for bad condition. 0 (0)

- Fitting condition of stanchions was improper. 0 (0)

Offenses of Common Items or those in the part of the pilot ladders in combination ladders were gathered in (1) or (2) above.

(4) Mechanical pilot hoist 0 (0)

No pilot ladder was arranged. 0 (0)

Note: The shipmaster was recommended to use the combination ladder.
1.7 Offenses broken down by the size of ships

Offenses in transfer arrangements were broken down by ship’s size (Gross tonnage).

**OFFENSES BROKEN DOWN BY THE SIZE OF SHIPS**

<table>
<thead>
<tr>
<th>Size</th>
<th>Less than 3,000 GT</th>
<th>3,000 to 10,000 GT</th>
<th>10,000 to 50,000 GT</th>
<th>Over 50,000 GT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Offenses</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

(1) Common Items

- Lifebuoy: 1
- Responsible officer: 1, 1
- Lighting: 1
- * Communication: 1
- * Safe route: 1

(2) Pilot ladder

- Ladder itself
- Spreader
- Bulwark ladder
- Handhold stanchion
- Height exceeds 9m: 1
- Man ropes: 1
- Not at flat side
- Near discharges
- Improper condition
- Improper ladder
- Heaving line

(3) Combination ladder: 1

(4) Pilot hoist

Total offenses: 1, 0, 3, 1

Grand Total: 13, 69, 338, 123

Offense rate: 7.7, 0.0, 0.9, 0.8

Note: Mark " * " shows offense against new SOLAS
1.8 Result of checking according to IMPA Recommendations

The compulsory regulations of SOLAS Conventions are supplemented by recommendations by IMPA. During the campaign in 2009, pilots advised shipmasters to satisfy the Recommendations for 2 cases on 2 ships. (1 advices on 1 ships in 2008.)

(1) Common Items 0 (0)
  ① The 9-metre mark was not indicated. 0 (0)

(2) Pilot ladder 2 (1)
  ① The lower end of a pilot ladder formed into a loop, or a retrieving line was connected to the end. 1 (1)
  ② Height of lower end was improper. 1 (0)

(3) Combination ladder 0 (0)
  ① Height of platform was improper. 0 (0)
  ② Distance between pilot ladder and platform was too large. 0 (0)

(4) Mechanical pilot hoist 0 (0)
  ① Though the freeboard exceeded 9m, a mechanical pilot hoist was used. 0 (0)
IV. Measures for Offended Ships

1. Measures during the safety campaign

1.1 Request on improvement

During this campaign, some offenses were found in the transfer arrangements of 5 ships. The pilot who found those offenses handed "NOTICE TO SHIPMASTER" to the master of the ship and requested him to improve the arrangements.

1.2 Ships having serious offenses

Of the above 5 ships, 3 ships were regarded as having serious offenses. As for these ships, the pilot requested the masters to immediately improve the condition during the stay in port or their navigation, and later he confirmed the improved condition. (See page 3 for serious offenses)

When the master requested to improve the serious offenses neglect it even though he can improve the condition, the pilot is to defer embarkation temporarily. There was however no such case during this campaign as were experienced during past campaigns.

2. Others

Of 2 ships having serious offenses in their transfer arrangements, there was no ship which was unable to immediately improve its offended arrangements, because much time was required for repairs, so that the "List of ships which need attentions for its transfer arrangements" was not appended this year.
V. Future Schedule of the Safety Campaign

According to the result of the Safety Campaigns carried out every year, the rates of offenses and serious offenses have been decreased and the transfer arrangements have been gradually improved.

Recently, there were problems in the operations - for example, "Responsible officer was not present at access point." or "Lifebuoy with self-igniting light was not provided." on ships even though the arrangements themselves were in good conditions.

We therefore consider it very important to improve understanding on the degree of danger of transfer and the fundamental knowledge on the arrangements. The safety campaign would be continued to improve the condition of the ships with said offenses in the arrangements and operation.

The Japan Federation of Pilots' Associations would like to ask all pilots, ships' crew and parties concerned as a favor of continued careful consideration to the transfer arrangements for the safe transfer of pilots and to ensure the smooth operation of ships.