

SUB-COMMITTEE ON NAVIGATION,  
COMMUNICATIONS AND SEARCH AND  
RESCUE  
3rd session  
Agenda item 25

NCSR 3/25/2  
14 December 2015  
Original: ENGLISH

**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, AND  
ENVIRONMENT-RELATED CONVENTIONS**

**Pilot transfer arrangements (SOLAS regulation V/23.3.3)**

**Submitted by the International Association of Classification Societies (IACS) and  
the International Maritime Pilots Association (IMPA)**

**SUMMARY**

<i>Executive summary:</i>	In this document the co-sponsors propose a change to the wording of MSC.1/Circ.1495 to clarify the intent of this circular
<i>Strategic direction:</i>	1.1
<i>High-level action:</i>	1.1.2
<i>Output:</i>	1.1.2.3
<i>Action to be taken:</i>	Paragraph 8
<i>Related documents:</i>	MSC.1/Circ.1495; NAV 59/16/1, NAV 59/20, section 16; NCSR 1/24, NCSR 1/28, section 24 and annex 21; MSC 94/21, paragraphs 9.36 to 9.38

**Background**

1 IACS (NAV 59/16/1) submitted to NAV 59 a copy of its Unified Interpretation (UI) SC257 on pilot transfer arrangements. Subsequently, the Sub-Committee did not agree with IACS UI SC257 as presented, and invited IACS to reconsider its proposal.

2 Accordingly, based on the outcome of the discussions at NAV 59, IACS redrafted UI SC257 and submitted the revised interpretation to NCSR 1 (NCSR 1/24). Having discussed the issue further and noting, in particular:

*"the most fundamental principle of regulation V/23 and its predecessor had always been that a pilot should never have to climb a ladder more than nine metres from the surface of the water"; and*

*"the decision of NAV 59 to confirm the requirements of regulation V/23 would not result in any ship, now or in the future, having to add an accommodation ladder solely due to a possible adverse list of 15 degrees";*

the Sub-Committee decided to instruct the Secretariat to prepare a draft MSC circular for a unified interpretation for approval by the Committee (NCSR 1/28, paragraphs 24.4 and 24.5 and annex 21). MSC 94 subsequently approved MSC.1/Circ.1495.

## **Discussion**

3 The co-sponsors concur with the comments expressed at NCSR 1 as provided in paragraph 2 above; in particular that SOLAS regulation V/23, and the text of the previous SOLAS regulation (SOLAS regulation V/17), clearly prescribe that a pilot shall never have to climb a single pilot ladder more than nine metres from the surface of the water.

4 However, subsequent to the publication of MSC.1/Circ.1495, the co-sponsors, noting that the stakeholders impacted by this regulation are not only ships' crews and pilots, have recognized that there now exists in the industry some confusion as to the intent of the circular.

5 The circular addresses two issues which the co-sponsors believe should be addressed separately:

- .1 an operational instruction; and
- .2 equipment arrangement requirements.

6 In this regard, the operational limitation is clear in that SOLAS regulation V/23.3.3.1 limits the distance a pilot shall have to climb on a single pilot ladder to 9 metres. As such, SOLAS regulation V/23.3.3.1 prescribes an operational instruction and it is not intended to address the equipment arrangements (see paragraph 2 above).

## **Proposal**

7 The co-sponsors propose that, in order to clarify the intent of MSC.1/Circ.1495 and separate the operational instruction from the equipment arrangement requirements; paragraph 1 of the interpretation provided at the annex to MSC.1/Circ.1495 should be modified as follows (additions/deletions):

"1 SOLAS regulation V/23.3.3.1 prescribes an operational instruction that limits the climb to not more than 9 m on a single ladder regardless of the trim or list of the ship. ~~If only a pilot ladder is to be used, the maximum height of 9 m from the "safe and convenient access to, and egress from, the ship" to the surface of the water is to include consideration of an adverse list of 15°.~~"

## **Action requested of the Sub-Committee**

8 The Sub-Committee is invited to consider the foregoing and, in particular, the proposal in paragraph 7 above.

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