

MARITIME SAFETY COMMITTEE
94th session
Agenda item 9

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NAVIGATION, COMMUNICATIONS, SEARCH AND RESCUE

Comments on the draft circular on pilot transfer arrangements (SOLAS regulation V/23.3.3) and document MSC 94/9/1

Submitted by IMPA

SUMMARY

Executive summary: This document contains comments on the draft circular on regulation V/23 proposed for approval in MSC 94/9, annex 21 and on MSC 94/9/1 submitted by Spain on the same subject

Strategic direction: 1.1

High-level action: 1.1.2

Planned output: 1.1.2.3

Action to be taken: Paragraph 8

Related documents: NAV 59/16/1, NAV 59/20; NCSR 1/24, NCSR 1/24/2, NCSR 1/28; MSC 94/9 and MSC 94/9/1

Introduction

1 This document comments on MSC 94/9 and MSC 94/9/1 and is submitted in accordance with paragraph 6.12.5 of MSC-MEPC.1/Circ.4/Rev.2, *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies*, on the submission of proposals for planned outputs.

Background

2 The most basic, fundamental principle of regulation V/23 and its predecessors has always been that a pilot, in consideration of the safety risks, should never have to climb a ladder more than 9 metres from the surface of the water. This principle was never questioned in the deliberations over the recent revision to regulation V/23.

3 The IACS Unified Interpretation (UI) submitted to NAV 59 (NAV 59/16/1) was rejected (NAV 59/20) based on considerations related to the safety of the pilot and the potential for the UI to result in the need for a pilot to climb more than 9 metres. The

subsequent IACS submission to NCSR 1 (NCSR 1/24) and the deliberations of the Sub-Committee resulted in the draft circular. Those deliberations included removing a recommended implementation date. IACS had suggested that the decision of NAV 59 might involve a change in the pilot transfer design arrangement. IMPA (NCSR 1/24/2) noted that the NAV 59 decision merely confirmed requirements that had been in place for 40 years. For that reason, IMPA saw no need for an implementation date or even for a circular but agreed that the text of the draft circular, as amended by NCSR 1 for submission to MSC 94, accurately reflected the decision of NAV 59 and was consistent with the language and intent of regulation V/23.3.3.

4 In document MSC 94/9, the Committee is invited to approve the draft MSC circular on Unified Interpretation of SOLAS regulation V/23.3.3 on Pilot Transfer Arrangements (NCSR 1/28, paragraphs 24.2-24.11 and annex 21).

Discussion

5 In document MSC 94/9/1, Spain invites the Committee to confirm Spain's views of the "fundamental consequences" of the conclusions of NCSR 1 and to clarify the "scope of application" of the draft circular.

6 In its submission, Spain states that the NCSR 1 conclusions were that a 15-degree adverse list is a "normal condition" and that the 15-degree adverse list must be considered when determining the configuration of pilot transfer arrangements. IMPA finds no reference in the report of NCSR 1 to the 15-degree adverse list as a "normal condition", and therefore, does not believe the interpretations of Spain necessarily reflect the agreement of NCSR 1. In fact, Spain's statement in MSC 94/9/1 paragraph 4.1 that an adverse list of 15 degrees must be used "in determining whether combination arrangements are needed (pilot ladder + accommodation ladder)" seems directly contrary to the agreement of NCSR.

7 As stated above, IMPA sees no compelling need to issue an interpretation of regulation V/23 with regard to the adverse list allowance and the required length of a pilot ladder, as we believe both items are quite clear and have been in existence for many years. Nevertheless, bearing in mind the needs of ship designers and classification societies, IMPA is prepared to support approval of the circular as written. The confirmations and clarifications requested in the document MSC 94/9/1, however, would only serve to confuse a matter that was discussed at great length and ultimately agreed at both NAV 59 and NCSR 1.

Action requested of the Committee

8 The Committee is invited to consider the above and take action as appropriate.
