

SUB-COMMITTEE ON NAVIGATION,  
COMMUNICATIONS AND SEARCH AND  
RESCUE  
4th session  
Agenda item 24

NCSR 4/24/3  
20 January 2017  
Original: ENGLISH

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

**Comments on the proposal for a unified interpretation of  
resolution A.1045(27) on *Pilot transfer arrangements*  
with regard to specification of hardwood for steps of pilot ladders**

**Submitted by the International Maritime Pilots' Association (IMPA)**

**SUMMARY**

<i>Executive summary:</i>	This document comments on documents NCSR 4/24/2 (Japan) and NCSR 4/INF.12 (Japan)
<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 7
<i>Related documents:</i>	SOLAS regulation V/23; resolution A.1045(27); ISO 799:2004 and NCSR 4/INF.3

**Introduction**

1 This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.5) and comments on documents NCSR 4/24/2 (Japan) and NCSR 4/INF.12 (Japan).

2 In document NCSR 4/24/2, Japan proposes a unified interpretation of resolution A.1045(27) on *Pilot transfer arrangements* that would interpret the requirement in the resolution that pilot ladder steps be made of hardwood "free of knots" to allow steps with knots, as long as the knots are "strong knots." In document NCSR 4/INF.12, Japan includes results of testing various steps made of yellow poplar/tulipwood with knots. IMPA is very concerned at the proposal for a unified interpretation on hardwood ladder steps as set out in document NCSR 4/24/2.

**Background**

3 As indicated in document NCSR 4/INF.3, IMPA notes that pilots are still not seeing the improvement in safety of pilot ladders that should have been expected following the 2012 coming into force date of SOLAS regulation V/23. One difficulty has been the delay in revising ISO 799:2004 to provide the standards necessary to give effect to the requirements of SOLAS regulation V/23. However, another difficulty has been a reluctance to comply with the clear requirements of SOLAS regulation V/23 and resolution A.1045(27) for which no new standards, interpretations or exceptions are needed or appropriate.

4 As shown in document NCSR 4/24/2, paragraph 3, the paragraph 2.1.2.1 of resolution A.1045(27) states that steps of pilot ladders "if made of hardwood, should be made in one piece, free of knots." The phrase "free of knots" is simple, clear and unambiguous and has stood the test of time having been used in previous revisions of Pilot transfer arrangement regulations.

5 IMPA cannot support the proposal in document NCSR 4/24/2 that "free of knots" should be interpreted to mean free of "significant knots," which document NCSR 4/24/2 would define as "sound knots." For that reason, IMPA does not believe a unified interpretation is required which would measure and inspect "sound" knots. The ability to discern "sound knots," if not subjective, is at the very least a more difficult task than determining if a step is free of knots. In document NCSR 4/24/2, Japan defines sound knots as "solid across its face, hard as the surrounding wood, and showing no signs of decay." One would have to question what the test for indicating that the knot is "hard as the surrounding wood" would have to be and if it could be done without stressing or weakening either the knot or the rest of the step.

6 Given the ongoing problem of substandard pilot ladders and transfer arrangements, IMPA believes that the Organization should not retreat from its policy underlying SOLAS regulation V/23 and resolution A.1045(27) of protecting the safety of pilots. The requirement that hardwood steps be free of knots is part of that safety commitment.

**Action requested of the Sub-Committee**

7 The Sub-Committee is invited to consider the above and decide that pilot ladder steps should continue to be made of hardwood and be free of knots, as specifically required under resolution A.1045(27).

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