



## **NOTICE TO INDUSTRY**

**Notice Number:** NTI 09 / 2020

**Date issued:** February 28, 2020

**District:** All

### **Subject: Combination Ladder Arrangements and Pilot Safety**

#### **Details:**

The Vision of the Atlantic Pilotage Authority is to be a respected leader in marine pilotage safeguarding people, property and the environment. To achieve this, the Authority must demonstrate marine expertise in the field of marine navigation and safety, thereby maintaining an industry-leading safety record.

On December 30<sup>th</sup>, 2019 a New York licensed pilot was killed from a fall while embarking an inbound container ship. The embarkation in this instance was via a combination arrangement of an accommodation ladder and a pilot ladder. Such a combination is required whenever the distance from the surface of the water to the point of access to the ship is more than nine meters. This combination arrangement, however, involved a trapdoor in the platform of the accommodation ladder with the pilot ladder hanging from a cross beam near the bottom of the platform, and with the top step of the ladder significantly below the level of the platform. This requires a pilot to pull himself or herself up through the trapdoor while twisting to get a secure footing on the platform. Captain Sherwood fell while attempting to make that difficult maneuver to transfer from the pilot ladder to the platform above.

This trapdoor arrangement is currently found on several ships with accommodation ladder-pilot ladder combinations that call in Eastern Canada. This arrangement continues to be used despite being considered unsafe by pilots and that the IMO has recognized that it is unsafe by taking steps to eliminate it.

In 2011, the IMO revised the SOLAS pilot transfer regulation (SOLAS V/23) and its implementing guidelines (Res. A.1045) in response to continuing complaints about unsafe pilot transfer arrangements. The effective date for the new standards was July 1, 2012. Several of the revisions addressed the use of trapdoors in combination arrangements and were intended to eliminate pilot ladders that hang from the bottom or near bottom of the platform, as well as other problems with such arrangements.

To address the pilot ladder-platform transition issue, Regulation 23 specifies that a pilot ladder “shall be rigged through the trapdoor and extend to the height of the handrail” (V/23.3.3.2.1) and, in addition, “means shall be provided to secure the lower platform of the accommodation ladder to the ship’s side, so as to ensure that the lower end of the accommodation ladder and the lower platform are held firmly

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against the ship's side." (V/23.3.3.2). Similarly, Resolution A.1045 provides that when a trapdoor is used in a combination arrangement, "the pilot ladder should extend above the lower platform to the height of the handrail and remain in alignment with and against the ship's side." (A.1045, paragraph 3.8).

The Atlantic Pilotage Authority (APA) is aware that some ships employ an accommodation ladder/pilot ladder combination with a trapdoor that does not meet IMO standards in effect since 2012. While this does not apply to all vessels the APA would like stakeholders with such arrangements to note that Pilots they may refuse to use a pilot transfer arrangement that they reasonably believe is unsafe or does not meet SOLAS standards. See [NTI 01 \[Pilot Ladder Arrangements\]](#). This includes trapdoor arrangements.

The Atlantic Pilotage Authority urges stakeholders with vessels employing a trapdoor arrangement to bring their arrangements into compliance with the current IMO standards as soon as possible in order to avoid potential disruptions to ship schedules and port operations.

Ships can either:

- 1) switch to the more traditional system of a pilot ladder hung from the ship's deck, positioned adjacent to the accommodation ladder platform, and secured to the ship's hull at a point nominally 1.5m above the platform; or
- 2) ensure that the trapdoor arrangement meets the following IMO standards:
  - a. pilot ladder rigged through the trapdoor extending above the platform to the height of the handrail
  - b. lower platform of accommodation ladder secured to the ship's side, to ensure that the lower end of the accommodation and the lower platform are held firmly against the ship's side; and
  - c. pilot ladder remains against the ship's side

If there are any questions or concerns with the contents of this notice, please contact the Operations Department of the APA at [operations@atlanticpilotage.com](mailto:operations@atlanticpilotage.com).

See links to Canadian Notice to Mariners Annual Edition section b for reference below.

[\(English\)](#) [\(French\)](#)