

Crowley Petroleum Services
Capt. Mark A. Homeyer
Director Operations – Pacific Region
1102 S.W. Massachusetts Street
Seattle, Washington 98134-1030

December 20, 2021

Dear Captain Homeyer,

The west coast pilot associations have had discussions on a common issue affecting the safety of pilot transfers. The goal of these discussions is to provide ships and companies a consistent message on the rigging and securing of pilot ladder arrangements in conjunction with accommodation ladders, otherwise known as combination arrangements.

Our discussions focused on the requirement that “means shall be provided to secure” the lower platform of the accommodation ladder to the ship’s side and the pilot ladder and manropes to the ship’s side “at a point nominally 1.5m above the bottom platform of the accommodation ladder.” While it is preferable to accomplish this required “securing” by using appropriate lines attached to recessed hull fittings, if such hull fittings are not available, magnets or suction cups specifically designed for this purpose are acceptable. U.S. Coast Guard Marine Safety Alert 14-14 provides important information regarding use of hull magnets.

Common issues we encounter include:

1. The platform of the accommodation ladder being too low,
2. Only one securing point used for both accommodation and pilot ladders,
3. Only one side of the pilot ladder secured,
4. Loose securing methods allowing the pilot ladder or accommodation ladder to move around the securing points,
5. Improperly rigged magnet or suction cup devices.

Individual pilots may request changes if they recognize a safety issue and may refuse to use a transfer arrangement that he or she reasonably believes is unsafe.

We would also like to bring to your attention International Maritime Organization (IMO) regulations and standards, as well as U.S. Coast Guard safety alerts and bulletins, which are applicable to pilot transfer arrangements and procedures. Below is a list of these important references, along with links to access the documents. We urge you to ensure that your officers and crews are not only well-versed on these references, but also trained to implement them so that pilot transfer arrangements and procedures aboard your vessels are in full compliance with these critical regulations and standards. These references are:

1. International Convention for the Safety of Life at Sea (SOLAS) Regulation V/23 governs pilot transfer arrangements
<https://www.americanpilots.org/SOLAS%20Reg%20V-23.pdf>

2. IMO Assembly Resolution A.1045 (27) lays out additional standards for pilot transfer arrangements
[https://www.americanpilots.org/A.1045\(27\).pdf](https://www.americanpilots.org/A.1045(27).pdf)
3. U.S. Coast Guard Marine Safety Information Bulletin (MSIB) 21-20, Ch. 2, "Recommendation for Pilot Transfer Arrangements"
<https://www.americanpilots.org/MSIB%2021-20%20CH%202%20Recommendation%20for%20Pilot%20Transfer%20Arrangements.pdf>
4. U.S. Coast Guard Marine Safety Alert 14-14, "Designed for a Reason – Hull Magnets: Modifications Made to Pilot Ladder Magnetic Securing Devices Lead to Accidents"
https://www.americanpilots.org/MSA_1414.pdf
5. International Maritime Pilots' Association (IMPA) Pilot Ladder Poster
<https://www.impahq.org/impahq-policies-publications/pilot-ladder-poster>

Thank you in advance for your attention to the issues raised in our discussions and to the important references included in this letter. We again urge you to share this information with your vessel officers and crew, and conduct appropriate follow-up to ensure your vessels are in compliance with the applicable pilot transfer regulations and standards.

Sincerely,



Alaska Marine Pilots



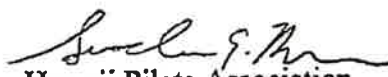
Southwest Alaska Pilot Association



Southeast Alaska Pilot Association



British Columbia Coast Pilots



Hawaii Pilots Association



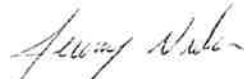
Puget Sound Pilots



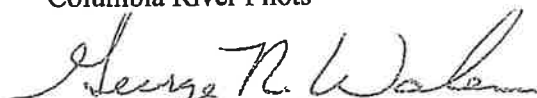
Grays Harbor Pilots



Columbia River Bar Pilots



Columbia River Pilots



Coos Bay Pilots Association



San Francisco Bar Pilots



Jacobsen Pilot Service



Los Angeles Pilotage Service