

海事處

船舶事務科

香港 中環 統一碼頭道 38 號
海港政府大樓 24 樓

電話號碼：(852) 2852 4510
傳真號碼：(852) 2545 0556

網站 Web Site： <https://www.mardep.gov.hk>
電郵地址 E-mail： ss_css@mardep.gov.hk
貴署檔案 Your Ref.： ---
本處檔案 Our Ref.： MD-CSS-F02-040-04A-001



MARINE DEPARTMENT

Shipping Division

24/F., Harbour Building,
38 Pier Road, Central, Hong Kong

Tel No.: (852) 2852 4510
Fax No.: (852) 2545 0556

20 May 2022

To: Shipowners, Ship Managers and Masters of Hong Kong registered ships

Dear Sir/ Madam,

**PSC Detainable Deficiencies related to Pilot Transfer Arrangements
and Safe Handling of Hatch Covers**

Deficiencies related to pilot transfer arrangements and safe handling of hatch covers on Hong Kong registered ships were recently reported. As such, Hong Kong Marine Department (MD) would like to draw the attention of all concerned parties on the followings:

Pilot Transfer Arrangements

- i) SOLAS Chapter V Regulation 23.2.3 stated that a pilot ladder shall be certified by the manufacturer as complying with the regulation or with an international standard acceptable to IMO. It refers to ISO 799-1:2019 ‘Ships and marine technology – Pilot ladders’;
- ii) IMO Resolution A.1045(27), as amended by A.1108(29), set out further detailed technical specification on the construction and installation of pilot transfer arrangements;
- iii) IMO Circular MSC.1/Circ.1428 provided the illustration of pilot transfer arrangements as required by SOLAS, whereas IMO Circular MSC.1/Circ.1495/Rev.1 provided revised unified interpretation of SOLAS Chapter V Regulation 23.3.3 on pilot transfer arrangements;
- iv) PSC Officers may check the condition, installation, maintenance and inspection records of pilot transfer arrangements. The record should be maintained on board;
- v) As pilot ladders are not readily available at most ports and large delays may be expected in case of a non-compliant ladder, replacements should be

ordered at the earliest opportunity. Should there be any doubts or malfunctions found, the maker / Recognized Organization (RO) shall be contacted for rectification. The company should also apply dispensation in case the equipment could not be fixed prior arrival of any port; and

- vi) Seafarers involved in the rigging and operation of pilot transfer arrangements should be sufficiently trained.
- vii) Master or responsible officer supervising the rigging of the pilot transfer arrangements should assess whether supplementary measures, such as lifejackets, lifelines and lifebuoys be made available to enhance the safety of personnel using the pilot transfer arrangement.

Safe Handling of Hatch Covers

- i) IMO Circular MSC/Circ.1071 provided the guidelines on bulk carrier hatch cover surveys and owner's inspections and maintenance;
- ii) On vessels fitted with hatch covers, hatch cover maintenance plans should form part of the vessel's safety management system (SMS) as referred to in the ISM Code;
- iii) Apart from maintenance, the SMS should include relevant risk assessment, instructions, procedures, defined levels of authority, and line of communication accordingly for the safe operation of hatch covers;
- iv) Priority should be given to safe work practices, it is important that officers and crew on board should be cautious and strictly follow the relevant shipboard safety operation procedures;
- v) All crewmembers should stay clear of any movable parts prior to the operation of the hatch covers, especially when the operator have an obstructed view at the control console. Effective monitoring and communication arrangements should be established between the crewmembers operating the hatch covers;
- vi) Ensure proper securing of hatch covers at all times, unless they are being operated; and
- vii) Most common deficiencies are unsafe positioning of crew members during opening or closing of hatch covers, and unsafe securing of hatch covers, whilst the hatch covers are either partly or fully opened.

2. MD has provided a PSC Inspection (Pre-arrival) Checklist to assist the companies and ships in assessing the physical condition of their ship and be aware of the common detainable items before entering ports. We shall remind that for ships calling Australia ports, the pre-arrival checklist must be diligently filled in by the ship

crew and verified by the company before returning to Cargo Ship Safety Section.

3. Should you have any queries, please do not hesitate to contact us by email at ss_css@mardep.gov.hk

Yours faithfully,

(No signature on website)

(C. W. HO)

Senior Surveyor of Ship / Cargo Ships Safety Section
Shipping Division
for Director of Marine