

GUIDANCE NOTE 08/2025

PILOT TRANSFER ARRANGEMENTS

To: BUILDERS, DESIGNERS, MANAGERS, OWNERS, MASTERS AND RECOGNISED ORGANIZATIONS

1. BACKGROUND

- 1.1 IMO MSC 110 adopted amendments to SOLAS regulation V/23 on Pilot transfer arrangements (resolution MSC.572(110)) and the *Performance standards for pilot transfer arrangements* (resolution MSC.576(110)).
- 1.2 The International Maritime Pilot's Association's 'Required Pilot Transfer Arrangements' poster was revised and approved by MSC.1/Circ.1428/Rev.1 and is attached to this guidance note.
- 1.3 Under the provisions of the Cayman Islands Merchant Shipping Act (MSA) 2024, any amendments to IMO Conventions pertaining to COLREGS, Load Lines, SOLAS, STCW and Tonnage, including any associated codes and any other instruments made mandatory, automatically have the force of law, unless the discretionary powers under section 456(4) of the MSA are invoked via a Shipping Notice.
- 1.4 The purpose of this guidance note is to raise awareness of the various amendments which will have the force of law.
- 1.5 When drafting this guidance notice we have consulted with the UK Maritime Pilots Association (UKMPA).

2. AMENDMENTS SOLAS Chapter V Regulation 23 Pilot Transfer Arrangements

1. *Ships on which pilots may be employed shall be provided with pilot transfer arrangements.*
2. *Pilot transfer arrangements shall enable pilots and other personnel to embark and disembark safely in all seagoing conditions of draught and trim.*
3. *Pilot transfer arrangements provided in accordance with paragraph 1 and **installed on or after 1 January 2028** shall be designed, manufactured, constructed, secured and installed in accordance with the introduction and parts A, B and C of the performance standards adopted by the Maritime Safety Committee by resolution MSC.576(110), as may be amended by the Organization, provided that such amendments are adopted, brought into force and take effect in*

accordance with the provisions of article VIII of the present Convention concerning the amendment procedures applicable to the annex other than chapter I.

4. Pilot transfer arrangements **installed before 1 January 2028** on ships to which chapter I applies shall comply with the requirements provided in paragraph 3 not later than the **first survey* on or after 1 January 2029**.
5. Pilot transfer arrangements **installed before 1 January 2028** on ships to which chapter I does not apply shall comply with the requirements provided in paragraph 3 not later than **1 January 2030**.
6. Inspection, stowage, maintenance, replacement and familiarization of all pilot transfer arrangements, regardless of the installation date, shall comply with the introduction and parts D and E of the performance standards adopted by the Maritime Safety Committee by resolution MSC.576(110), as may be amended by the Organization, provided that such amendments are adopted, brought into force and take effect in accordance with the provisions of article VIII of the present Convention concerning the amendment procedures applicable to the annex other than chapter I.
7. For the purpose of the present regulation, the expression "installed on or after 1 January 2028" means a contractual delivery date for the pilot transfer arrangement or, in the absence of a contractual delivery date, the actual delivery date of the arrangement to the ship on or after 1 January 2028.
8. Pilot transfer arrangements provided for in paragraph 3 shall be approved by the Administration in accordance with part F of the performance standards adopted by the Maritime Safety Committee by resolution MSC.576(110), as may be amended by the Organization, provided that such amendments are adopted, brought into force and take effect in accordance with the provisions of article VIII of the present Convention concerning the amendment procedures applicable to the annex other than chapter I.
9. Pilot transfer arrangements provided for in paragraph 3 on ships to which chapter I applies shall be inspected in accordance with regulations I/6 and I/7 or I/8. Pilot transfer arrangements on ships to which chapter I does not apply shall be inspected to the satisfaction of the Administration.
10. Mechanical pilot hoists shall not be used.
11. Adequate means of illumination, either fixed or portable, shall be capable of illuminating all pilot transfer arrangements overside and the position on deck where pilots and other personnel embark or disembark. Portable lights, when used, shall have brackets to permit their positioning.
12. Where a pilot or other personnel suspect the pilot transfer arrangement provided is non-compliant, they should inform the master and refuse to use the arrangement until it is made compliant.

* Refer to Unified interpretation of the term "first survey" referred to in SOLAS regulations (MSC.1/Circ.1290).

3. SOME KEY POINTS

1. SOLAS Chapter V.23 now instructs pilots to refuse to use non-compliant arrangements.
2. All strong points, shackles and any securing ropes, must have a breaking strength of no less than 48kN.
3. The means of securing a pilot ladder at intermediate lengths now needs to be type approved, also with a breaking strength of no less than 48kN*
4. Pilot ladders can no longer be rigged from the deckhead.
5. Strict compliance with stanchion provisions.
6. At least one spare compliant pilot ladder and one spare set of manropes shall be carried on board the ship.
7. Pilot ladders, including spare ladders and manropes, shall be removed from service within 36 months after the date of manufacture or within 30 months after the date of being placed into service.
8. Cargo ships and commercial yachts <500 gross tonnage and pleasure yachts not engaged in trade (i.e. in private use) of all sizes, have until 01 January 2030 to achieve full compliance, if the arrangements pre-date 01 January 2028.

*Until such time that type approved devices are available on the market and have been satisfactorily demonstrated, the UKMPA continues to promote the best practice of using tagged 3m rope tails with rolling hitches.

4. YACHTS

There are no relaxations in the convention for yachts (commercial or private) and so designers and builders should be looking at early implementation on new projects to avoid the Owner having to undertake costly modifications, potentially soon after delivery.

The [Red Ensign Group \(REG\) Yacht Code 2024](#) section 28.2, only permits the omission of 'manropes' and a reduced ladder length (i.e. they need not be more than the freeboard of the vessel) for yachts less than 500GT.

It is recommended that builders/designers consult with their local maritime pilots when developing designs.

The most common criterion for compulsory pilotage is $\geq 500\text{GT}$ or $\geq 70\text{m}$ Length Overall (LOA), but it may be as low as 300GT or 30m LOA in some ports. The freeboard of pilot boats can vary considerably but is often between 1 and 2 meters.

A ladder may not be required for low freeboard ships. However, there may still be strict local requirements for the minimum clear width of side gate access points and their location, and the provision of suitable handholds. By way of example, see the below extract from the '[UK Code of Safe Practice for the Embarkation and Disembarkation of Pilots \(Rev.2025\)](#)': -

7. Low Freeboard Ships

7.1 When the ship to be served has a freeboard near to, or less than, that of the pilot boat particular caution should be as these transfers can be amongst the most hazardous. In these circumstances, there may be insufficient parallel body for the pilot boat to work against. Such situations can be worsened further if both the ship and the pilot boat are rolling or pitching. The potential

for damage to the pilot boat or injury to Pilot and deck crew is increased. There is also an added possibility that the pilot boat may become hung up on the ship's side.

7.2 *Before the transfer takes place, the coxswain and Pilot must be satisfied that the pilot boat is sufficiently stable alongside the ship for the transfer operation to be safely completed.*

7.3 *The Pilot should not stand outside the rail of the ship waiting for an opportunity to transfer.*

A side gate entrance should only be used if the gap between the stanchions is 70cm to 80cm, extending 120cm above the deck and have a diameter between 32mm-36mm.

7.4 *When making the decision to transfer, the Pilot should give consideration to factors including but not limited to:*

a) The availability of suitable handholds or stanchions at deck level.

b) The time taken to affect the transfer, particularly in adverse weather and any induced motion that may develop

c) The deck condition including if the deck is awash.

d) Vessel fendering.

e) Interaction between the pilot boat, the ship and proximity of parallel hull space.

f) The physical capability of the Pilot.

If a designer/builder does not foresee the need for pilot boarding arrangements the REG Yacht Code Statement of Compliance issued on delivery will simply state '*pilot transfer arrangements not provided*'. This should be made clear to the buyer in the yacht's contractual specification as it may be an operational limitation for some ports. If in doubt the requirements for 'low freeboard ships' should at least be met to facilitate a safe 'deck to deck' transfer.

If a designer/builder or operator (in the case of an existing vessel) does not achieve full compliance with the requirements for pilot boarding arrangements, the REG Yacht Code Statement or Certificate of Compliance issued will state '*pilot transfer arrangements not fully compliant; see **'Pilot Transfer Arrangement Booklet'***'. This booklet should contain the load test certificates for attachment points, type approval certificates, pilot ladder manufacture certificate and delivery note. Additionally, for vessels whose keels are laid on or after 01 January 2026 under Cayman Registry survey, our review letter of the pilot transfer arrangement drawing should also be included. This booklet should be submitted by the master to the pilot as part of the usual 'Master/Pilot Information Exchange'.

A pilot may refuse boarding via a non-compliant arrangement, thus preventing the vessel's entry into port, and the Port State authority may take enforcement action (i.e. detention or fine).

Since SOLAS Chapter V.23, now specifically instructs pilots to refuse to use non-compliant arrangements from 01 January 2028, a pilot is increasingly unlikely to apply discretion in the future, as they risk their personal accident insurance policy being declared "null and void" in the event of a claim.

Common issues with yachts include: -

- Ladder rigged from the deckhead.
- No vertical hand holds.
- Rubbing band obstructions, preventing the ladder steps from resting firmly against the ship's side.
- Pilot boarding stations not within the parallel mid body length of the ship.
- Fittings not appropriately approved and tested, or unapproved modifications being made to ladders.
- No suitable means available to adjust ladder length

Rubbing bands

The new performance standard states '*Where rubbing bands or other constructional features prevent the safe approach of a pilot boat, these shall be cut back to provide at least 6 m of unobstructed ship's side. Specialized offshore ships less than 90 m or other similar ships less than 90 m for which a 6 m gap in the rubbing bands would not be practicable, as determined by the Administration, may be exempted. In this case, other appropriate measures shall be taken to ensure that pilots and other personnel are able to embark and disembark safely.*'

The 'appropriate measures' should be documented in the 'Pilot Transfer Arrangement Booklet'.

Port Authority Notices

As an example of a Port Authority notice on pilot transfer arrangements covering super yachts, see Guernsey [LNTM 003/2025](#).

Therein, they state that exceptions may be granted to 'non-regular ships' and 'low freeboard ships'. However, it should be noted that they will not consider superyachts as non-regular ships.

5. EXISTING VESSELS

Apart from the implementation date there are no waivers or relaxations from the requirements for existing vessels, and so modifications to achieve full compliance should be planned for the next shipyard period.

6. LOAD TESTING OF ATTACHMENT POINTS.

Mock-up/shop proof load tests of attachment point arrangements should be carried out under the supervision of a Classification Society surveyor; Class approved FEM analysis to demonstrate the ability to withstand a 48kN breaking load may be accepted in lieu of a mock-up/shop proof load test.

Onboard proof load tests of pilot ladder attachment points should be 4.4kN, plus 50% the weight of the ladder.

Onboard proof load tests of manrope attachment points should be 4.4kN.

The basis of the proof load test figure above is that ISO 799-1:2019 requires a static load of 8.8kN to be applied on the bottom step of a ladder during production testing. As the ladder has two fixing points, 4.4kN per fixing is considered an appropriate amount for onboard proof load testing of fixing points; at least until IMO guidance on this matter is provided.

7. QUERIES

Any queries should be directed to technical@cishipping.com

8. ADDITIONAL RESOURCES

The UKMPA have produced an interactive 'Required Pilot Transfer Arrangements' poster; see link below:

<https://ukmpa.org/public-documents/interactive-pilot-transfer-arrangements/>

The UKMPA website hosts other useful information such as 'The Embarkation & Disembarkation of Pilots – Code of Safe Practice (2025)', accident reports and pertinent IMO/SOLAS information.

<https://ukmpa.org/public-documents/>