

GUIDANCE NOTE 08/2025 (Rev.1.1)

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**. Early adoption is encouraged to avoid potential issues with pilot access.
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**. Early adoption is encouraged to avoid potential issues with pilot access.
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.

* First survey means annual, periodical or renewal survey, whichever comes next.

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.

It is recommended that builders/designers, and operators (in the case of an existing vessel) 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 newbuild 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, a ***'Pilot Transfer Arrangement Booklet'*** should be provided. The newbuild REG Yacht Code Statement of Compliance will simply state *'Pilot transfer arrangements not fully compliant; see Pilot Transfer Arrangement Booklet'*. This potential operational limitation will not be carried over to the annually endorsable REG Yacht Code Statement/Certificate of Compliance, but the availability of this booklet will be verified during annual surveys. 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 (resolution MSC.576(110)), states under section 10: - *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.'*

If the rubbing band is required for hull girder strength (i.e. bending strength) then a statement to this effect is to be provided by the yacht's Classification Society. 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 do 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% of the weight of the ladder, per point.

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

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. PLAN REVIEWS - YACHTS

Cayman Registry will formally review all pilot transfer arrangement plans for yachts whose keels are laid on or after 01 January 2026, when under Cayman Registry survey during the build.

The arrangement can only be considered '*approved by the Administration*' if there are no non-conformities. If there are non-conformities the plan review letter will identify these and include the following notes: -

1. *A Pilot Transfer Arrangement Booklet is to be provided.*
2. *The arrangement is left to the satisfaction of the pilot. 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.*

Upon request, Cayman Registry can formally review pilot transfer arrangement plans for existing vessels for inclusion in the Pilot Transfer Arrangement Booklet. These should be sent to technical@cishipping.com with a completed [Request for Services Form](#); 4 hours will be charged for the review at the prevailing professional surveyor rate.

8. PILOT TRANSFER ARRANGEMENT BOOKLETS - YACHTS

The Pilot Transfer Arrangement Booklet should contain the following: -

- A) Pilot transfer arrangement plan
- B) Cayman Registry's plan review letter
- C) Class statement that the rubbing rail contributes to the hull girder strength, if applicable
- D) Photographs of the rigged arrangement
- E) Load test certificates for attachment points (i.e. pilot ladder and manropes)
- F) Pilot ladder type approval certificate
- G) Pilot ladder manufacturer's certificate (to be within 36 months)
- H) Pilot ladder delivery note/receipt (to be within 30 months)
- I) Manropes manufacturer's certificate, if applicable

D) to I) are the minimum mandatory contents.

The booklet itself is for information purposes only and may be in any format. It is not subject to Cayman Registry approval.

9. QUERIES

The International Maritime Pilots Association (IMPA) and UK Maritime Pilots Association (UKMPA) have been clear that, aside from the provision in resolution MSC.576(110) regarding rubbing bands on ships less than 90m in length, Administrations should not approve or agree to non-conformities. Given that the prescriptive requirements are very clearly laid out we are unable to engage in protracted discussions on proposed arrangements, as ultimately the arrangement must be to the pilot's satisfaction. Suffice it to say, all parties would expect closest possible compliance, where full compliance is evidently not practicable.

We have already received numerous requests from yachts to dispense with the spare pilot ladder requirement and to extend the replacement interval due to the following reasons: - space limitations, light usage, air-conditioned storage, the replacement cost of ladders with carbon fiber steps. This is a policy matter that should be discussed directly with IMPA via yacht industry associations.

Furthermore, the proposed use of ‘pilot fender mats’ above or below a rubbing band obstruction to enable the pilot ladder to rest more firmly against a yacht’s side is better discussed in the first instance with local maritime pilots as they will have a more informed view regarding the fitness for purpose of such an arrangement in the conditions likely to be encountered.

10. 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/>

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MSC.1/Circ.1428/Rev.1*
5 September 2025

REQUIRED PILOT TRANSFER ARRANGEMENTS FOR PILOTS AND OTHER PERSONNEL

1 The Maritime Safety Committee, at its 110th session (18 to 27 June 2025), 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)) developed at the eleventh session of the Sub-Committee on Navigation, Communications and Search and Rescue (NCSR) (4 to 13 June 2024).

2 The aforementioned amendments are expected to enter into force on 1 January 2028.

3 The Committee concurred with the recommendation of NCSR 11 regarding the revised required transfer arrangements for pilots and approved a revision to MSC.1/Circ.1428 and the poster previously circulated thereby, as set out in the annex. The illustrations are also available for download from www.impahq.org.

4 Member States are invited to bring the revised illustrations to the attention of their pilots, seafarers, shipowners, ship operators and others concerned with pilot boarding arrangements.

5 This circular should be implemented alongside the amendments to SOLAS regulation V/23 adopted by resolution MSC.572(110) and the *Performance standards for pilot transfer arrangements* adopted by resolution MSC.576(110).

6 MSC.1/Circ.1428 is revoked as of 1 April 2030.

* This document was reissued on 21 October 2025 to effect minor editorial corrections and include images of higher resolution.

REQUIRED PILOT TRANSFER ARRANGEMENTS



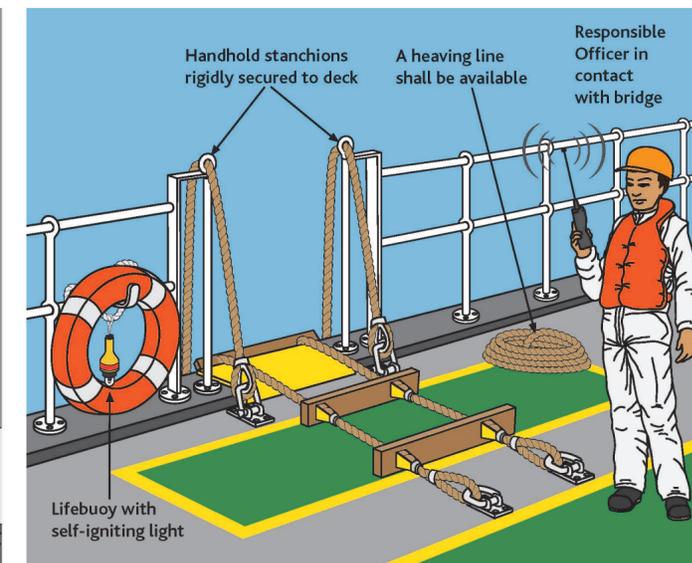
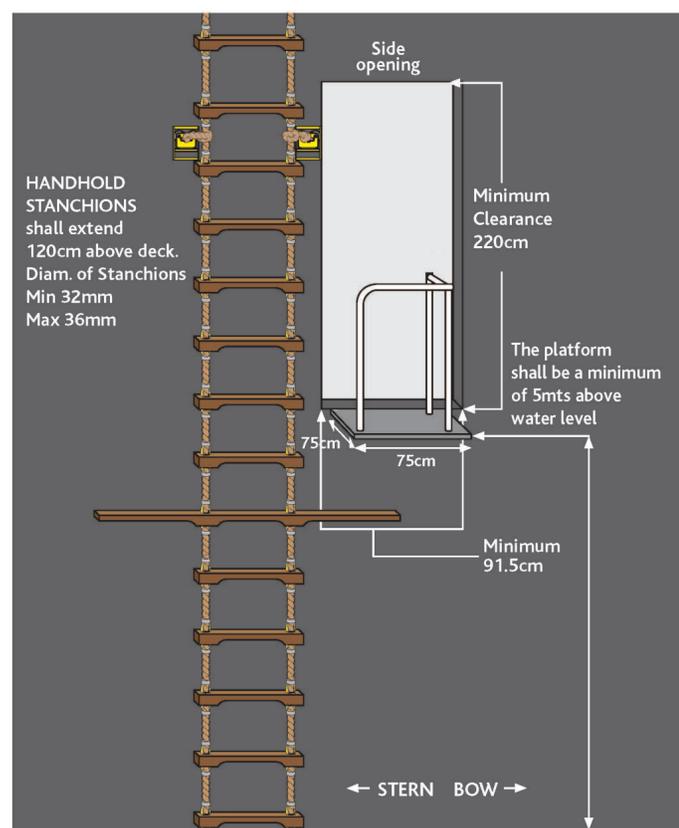
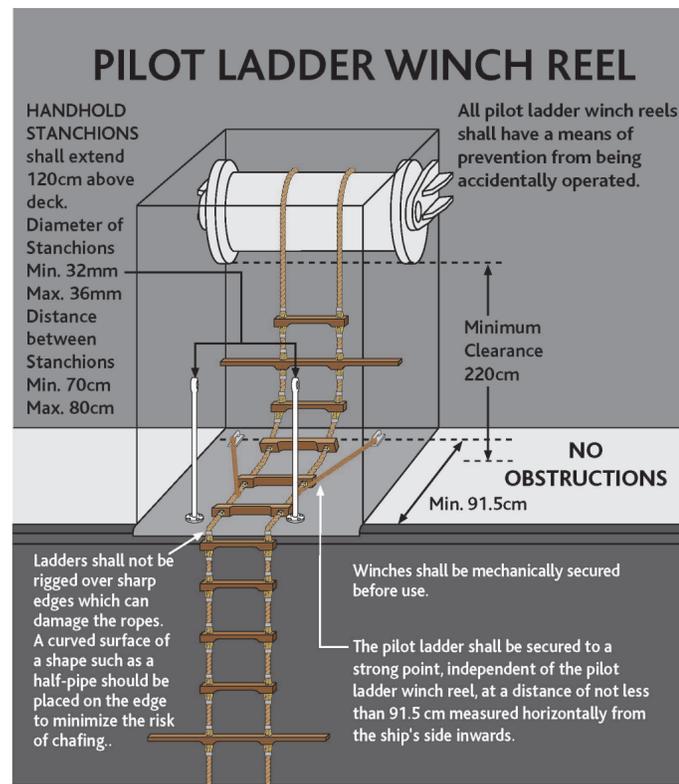
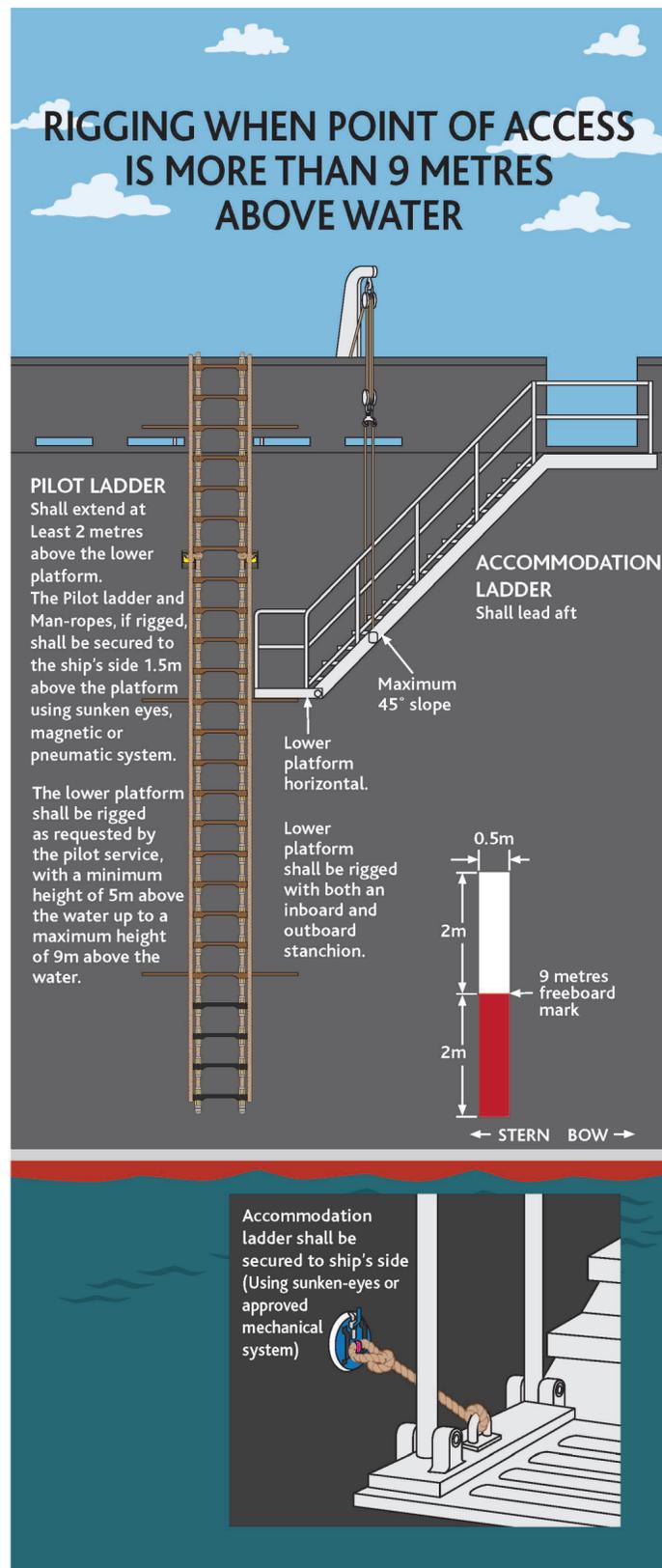
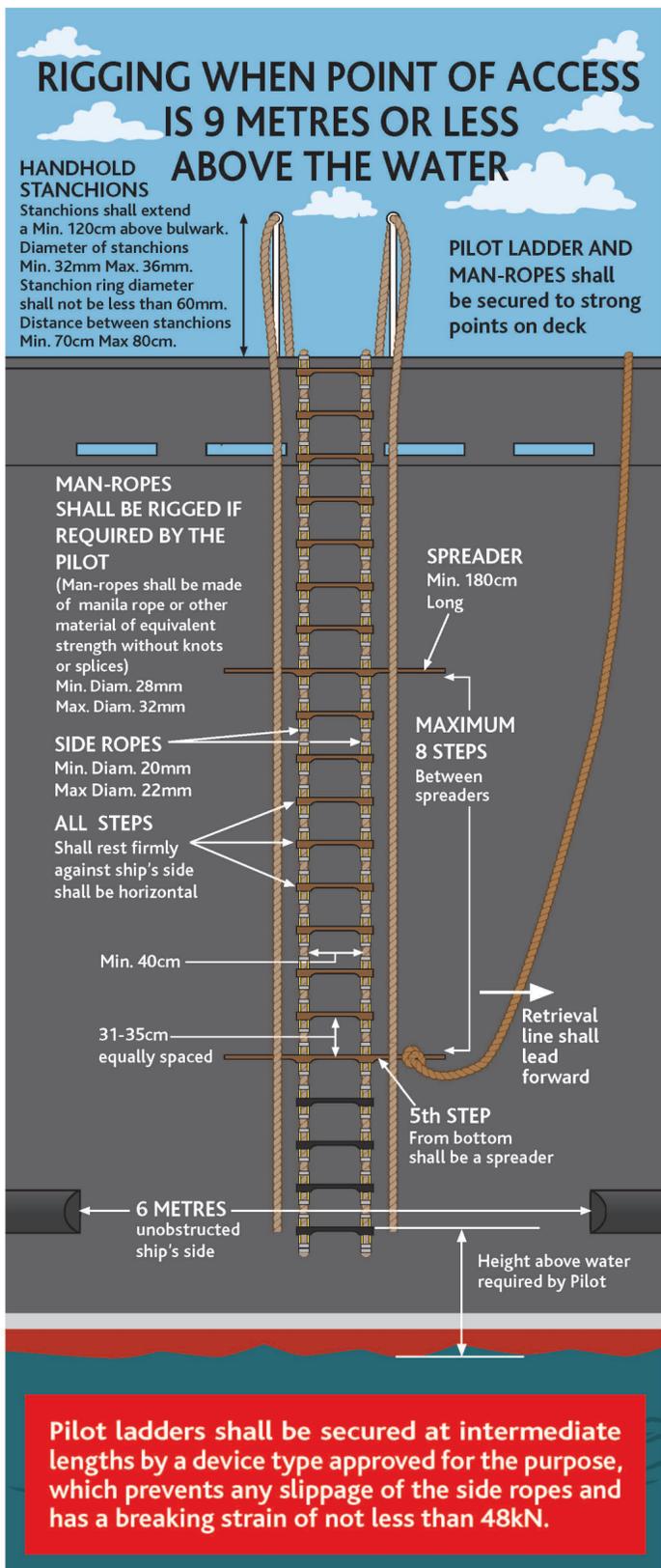
In accordance with SOLAS Chapter V Regulation 23
INTERNATIONAL MARITIME PILOTS' ASSOCIATION

Email: office@impahq.org

This document and all IMO Pilot-related documents are available for download at: www.impahq.org



Scan for more information



Duties of the Responsible Officer

- 1 Have knowledge of the correct use of Pilot Transfer Arrangements
- 2 Establish direct communication with bridge
- 3 Communicate with bridge during boarding process
- 4 Oversee / Check compliant rigging of the ladder
- 5 Test safety equipment in place and ready for use
- 6 Arrange for the pilot to be safely guided to/from the bridge via a clear illuminated route

All Companies shall have an approved safety management system which includes ship-specific procedures for the safe conduct of pilot transfers. The ISM Code requires that these procedures comply with SOLAS Chapter V regulation 23 and conform to IMO recommendations, international standards and guidance from marine industry organizations.

PILOT TRANSFER ARRANGEMENTS FOR TRAP DOOR AND SIDE DOOR DIAGRAMS CAN BE VIEWED BY SCANNING THE ABOVE QR CODE.

REQUIRED PILOT TRANSFER ARRANGEMENTS FOR TRAP DOOR AND SIDE DOOR

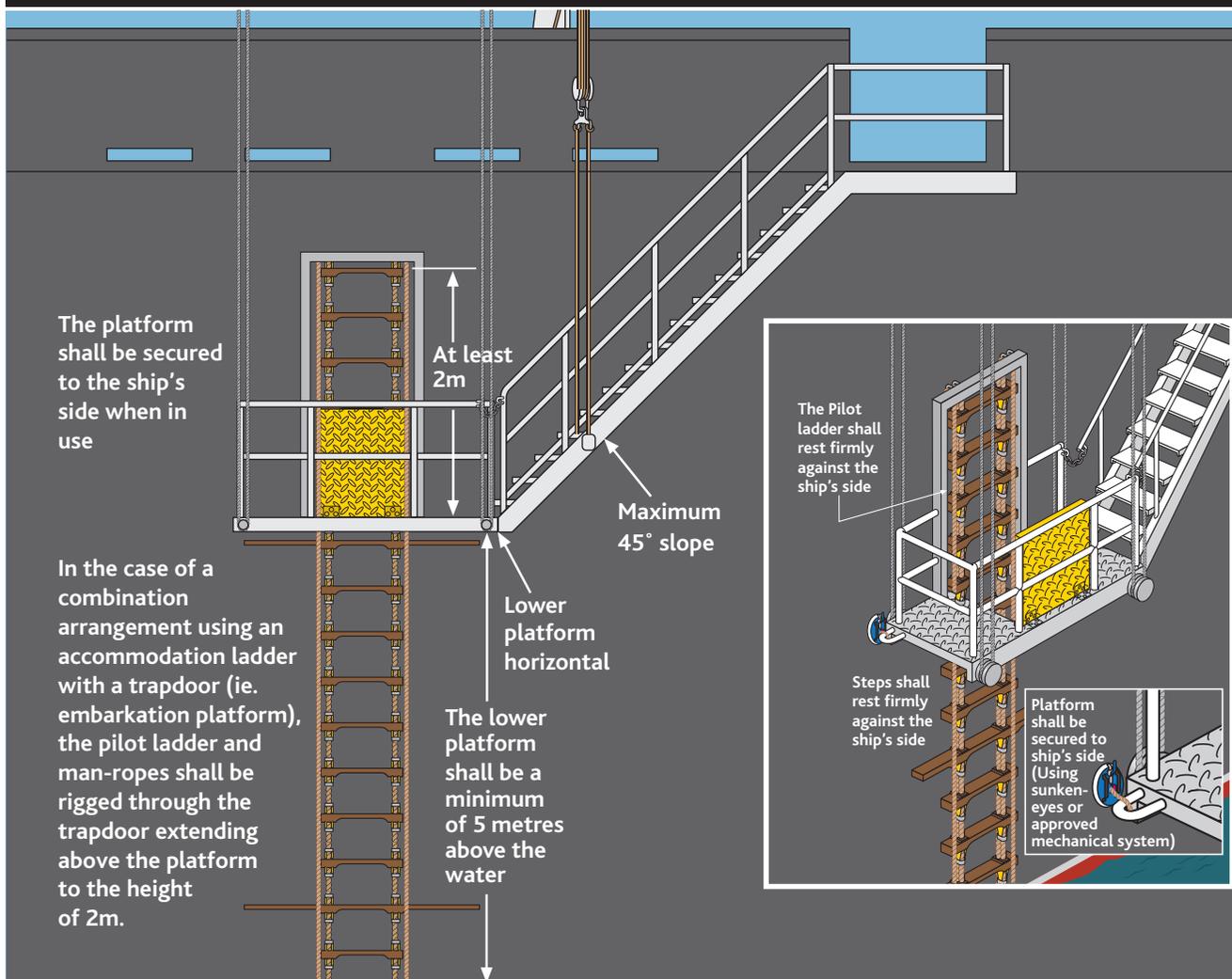


In accordance with SOLAS Chapter V Regulation 23
INTERNATIONAL MARITIME PILOTS' ASSOCIATION

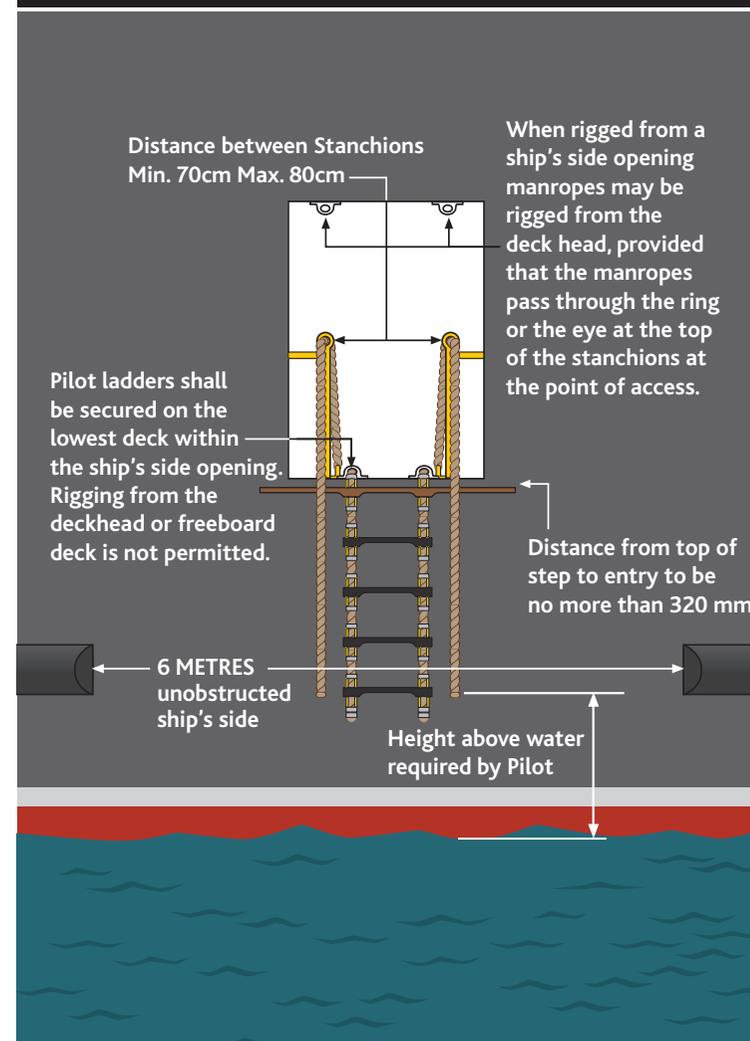


Email: office@impahq.org This document and all IMO Pilot-related documents are available for download at: www.impahq.org

ACCOMMODATION LADDER (TRAP DOOR ARRANGEMENT)



SIDE DOOR ARRANGEMENT



NON-COMPLIANT PRACTICES



In accordance with SOLAS Chapter V Regulation 23
INTERNATIONAL MARITIME PILOTS' ASSOCIATION
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