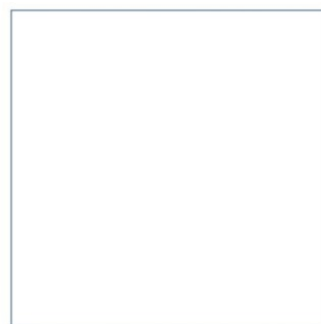
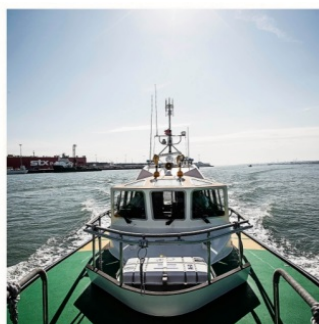
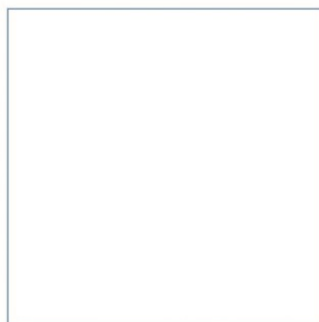


Argyll and Bute Council

Port Marine Safety Code

Audit: Dunoon Harbour 2021

October 2021



Innovative Thinking - Sustainable Solutions

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Port Marine Safety Code


Audit: Dunoon Harbour 2021

October 2021



Document Information

Document History and Authorisation		
Title	Port Marine Safety Code	
	Audit: Dunoon Harbour 2021	
Commissioned by	Argyll and Bute Council	
Issue date	October 2021	
Document ref	R.3729	
Project no	R/4952/01	
Date	Version	Revision Details
14 October 2021	1	Issued for client review
19 October 2021	2	Issued for client use

Authorised (Designated Person)	Approved (Quality Manager)	Authorised (Project Director)
Monty Smedley	Will Fellows	Gordon Osborn
		

Suggested Citation

ABPmer, (2021). Port Marine Safety Code, Audit: Dunoon Harbour 2021, ABPmer Report No. R.3729. A report produced by ABPmer for Argyll and Bute Council, October 2021.

Author

M.J. Smedley

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Contents

1	The Port Marine Safety Code	1
1.1	About the Harbour Authority.....	2
2	Purpose and Method	3
2.1	Audit scope.....	3
2.2	Audit definitions and outcomes.....	3
2.3	Audit date and criteria	4
2.4	Auditor.....	4
2.5	Auditees	4
3	Audit Summary.....	5
4	References.....	7
4.1	Websites	7
5	Abbreviations/Acronyms	8

Appendices

A	Detailed Audit Findings.....	11
A.1	PMSC Section 1 – Accountability for Marine Safety	11
A.2	PMSC Section 2 – Key Measures Needed to Secure Marine Safety	15
A.3	PMSC Section 3 – General Duties and Powers.....	23
A.4	PMSC Section 4 – Specific Duties and Powers	26
B	Quayside and Marine Operations.....	33
B.1	Quayside Checks	33
B.2	Marine Operations.....	36

Figure

Figure 1.	Harbour Limits.....	2
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Images

Image B1.1	Victorian Pier, north view.....	35
Image B1.2	Victorian Pier, south view.....	35
Image B2.1	Victorian Pier, south side, steps not in use	38
Image B2.2	Victorian Pier, deteriorated decking.....	38

1 The Port Marine Safety Code

The Port Marine Safety Code ('the Code') sets out a national standard for every aspect of port marine safety. Its aim is to enhance safety for everyone who uses, or works in, the UK port marine environment. It is authored by the UK Government, supported by the devolved administrations and representatives from across the maritime sector and, whilst the Code is not mandatory, these bodies have a strong expectation that all harbour authorities will comply. The Code is applicable both to Statutory Harbour Authorities and to other marine facilities, which may not have statutory powers; these are collectively referred to throughout the Code as 'organisations' (DfT, 2016).

In reading this audit report, the Council and Duty Holder should note the following extract from the Code:

"The Code does not contain any new legal obligations but includes (amongst other things) references to the main legal duties which already exist. Failure to comply is not an offence in itself. However, the Code represents good practice as recognised by a wide range of industry stakeholders and a failure to adhere to good practice may be indicative of a harbour authority being in breach of certain legal duties. Moreover, the organisation may suffer reputational damage if it has publicly committed to the Code's standards and then fails to meet them."

(DfT, 2016)

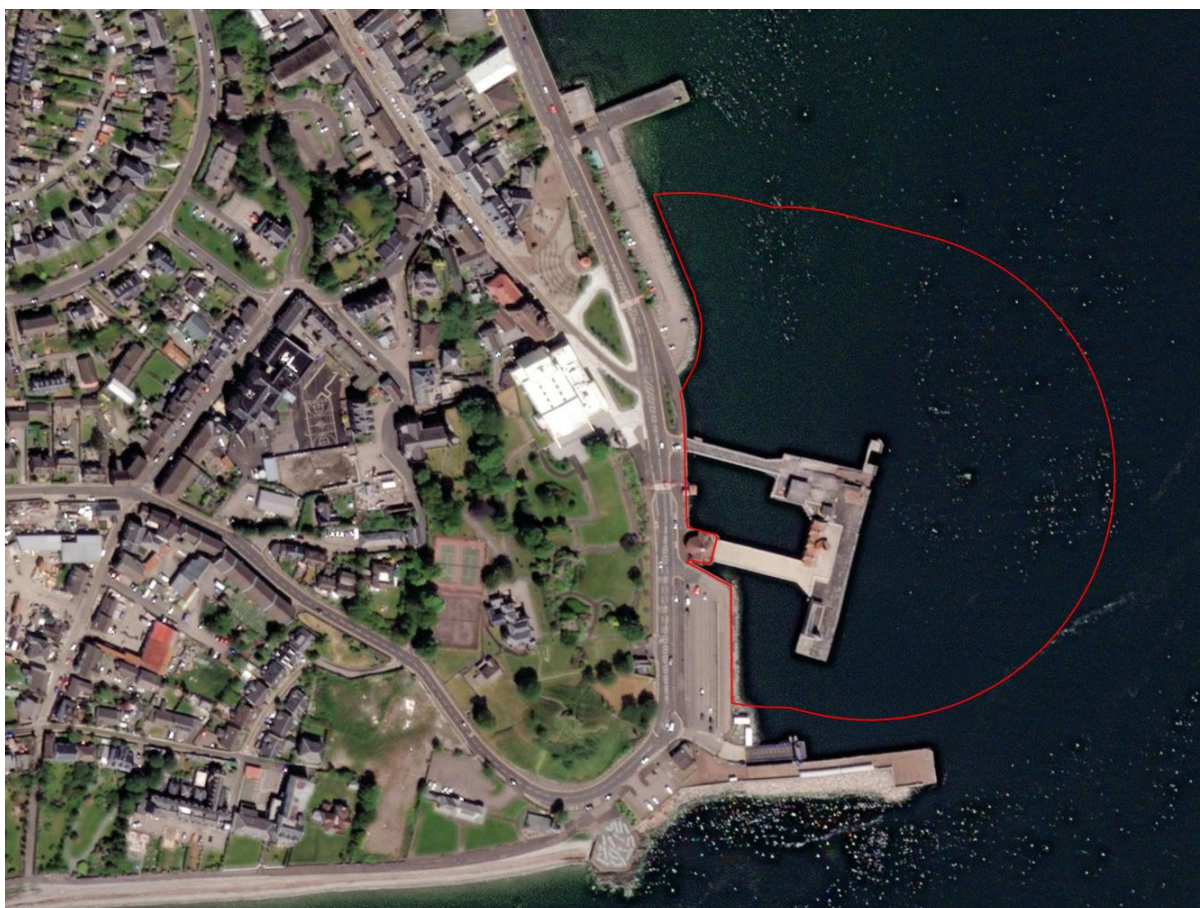
In order to measure compliance with the Code, the table below sets out the 10 Duty Holder responsibilities, and corresponding cross-references with sections of the Code, which this audit has considered.

No	PMSC Duty Holder Responsibilities		PMSC Section Reference
1	Duty Holder	Formally identify and designate the Duty Holder, whose members are individually and collectively accountable for compliance with the Code and their performance in ensuring safe marine operations in the harbour and its approaches.	1.6-1.8, 1.10, 1.16-1.17
2	Designated Person	A 'Designated Person' must be appointed to provide independent assurance about the operation of the marine safety management system. The designated person must have direct access to the Duty Holder.	1.11-1.12
3	Legislation	The Duty Holder must review and be aware of their existing powers based on local and national legislation; seeking additional powers if required in order to promote safe navigation.	2.3-2.6, 4.3-4.5
4	Duties and Powers	Comply with the duties and powers under existing legislation as appropriate.	1.3-1.5, 1.9, 1.13-1.15, 3.1-3.14, 4.2, 4.6-4.20, 4.25-4.32
5	Risk Assessment	Ensure all marine risks are formally assessed and are eliminated or as low as reasonably practicable in accordance with good practice.	2.7-2.11
6	Marine Safety Management System	Operate an effective marine safety management system which has been developed after consultation, is based on formal risk assessment, and refers to an appropriate approach to incident investigation.	2.12-2.17, 2.19-2.23, 2.25, 2.29
7	Review and Audit	Monitor, review and audit the risk assessment and marine safety management system on a regular basis – the independent designated person has a key role in providing assurance for the Duty Holder.	2.2, 2.24, 2.30-2.32
8	Competence	Use competent people (i.e. trained, qualified and experienced) in positions of responsibility for managing marine and navigation safety.	2.18
9	Plan	Publish a safety plan showing how the standard in the Code will be met and a report assessing the performance against the plan at least every 3 years.	2.26-2.28
10	Aids to Navigation	Comply with directions from the General Lighthouse Authorities and supply information and returns as required.	4.21-4.24

1.1 About the Harbour Authority

Dunoon is located on the Cowal Peninsula, on the western shore of the Firth of Clyde. Argyll and Bute Council is the Statutory Harbour Authority (SHA) for Dunoon by virtue of 'The Pier and Harbour Orders Confirmation (No. 2) Act 1906, Schedule 2, Dunoon Burgh Harbour Order'. The port is a Municipal Harbour Authority, being owned and operated by the Council. A&BC is the Local Lighthouse Authority (LLA) with respect to aids to navigation by virtue of Section 193 of the Merchant Shipping Act 1995. A&BC is not a Competent Harbour Authority with respect to Pilotage. The harbour limits are shown in Figure 1

The port is comprised of a breakwater at its southern end, which provides for a 73 m north-facing berth, with a 20 m east facing 'hammerhead' berth. The north-facing berth has a linkspan and is primarily used by the CalMac Ferries Limited (CFL) foot passenger ferry service to Gourock. To the north of the breakwater is the Victorian Pier, which is formed from a double pier and connected pierhead forming one long and continuous berthing face. To the north of the pier are two timber dolphins which further extend the berthing area. The original pier was built in 1835, with an extension to its current structure carried out in 1895. The Victorian Pier and Pier Buildings are Category A listed structures.



Source: Esri, DigitalGlobe, GeoEye. Contains information from the Scottish Government (Marine Scotland) licensed under the Open Government Licence v3.0

Figure 1. Harbour Limits

2 Purpose and Method

2.1 Audit scope

Argyll and Bute Council (A&BC) has contracted ABPmer to provide Designated Person services for its ports, harbours and piers. Part of this service includes the provision of annual auditing to establish if the Harbour Authority is compliant with the requirements of the Port Marine Safety Code (PMSC). The scope of the audit includes a review of Harbour Authority performance against the standard laid out within the latest edition of the Code. Any aspects that do not comply with, or fully address, the requirements of the Code will be identified, and recommendations for improvement will be made.

2.2 Audit definitions and outcomes

The following definitions are used in the audit report:

Non-compliance: is a failure to adhere to a legal requirement such as an Act, Order or its Regulations. The Port Marine Safety Code requires organisations to confirm compliance with the requirements of the Code. Therefore, Port Marine Safety Code audits are designed to test the requirements of the Code with any failure to comply identified as a 'non-compliance'.

Non-conformity: is an opportunity for the management system to improve through the identification of a requirement that is not met. Non-conformities are not regulatory but relate to the port or harbour's own operational instructions which are not met or fully met. Any non-conformities identified through the audit process are identified in bold text in the report.

Evidence: Non-compliances and Non-conformities are identified through factual evidence sampled during the audit.

2.2.1 Outcomes

The audit report uses the following outcomes:



Non-Compliance: a non-compliance with the requirements of the Code which are a breach of legal obligations or may compromise marine safety, environmental safety or present a significant reputational risk. Recommendations for addressing non-compliances are identified in red.



Observation: refers to an improvement opportunity such as an update to information, procedural change, or a non-conformity with local operating instructions. Whilst observations are defined as improvement opportunities, addressed them may improve the overall system standard. Recommendations for addressing observations are identified in yellow.



Satisfactory: a system component that meets or exceeds the requirements of the Code. Items of best practice are identified in bold.

Not applicable: part of the Code that is not relevant to the Organisation being audited.

2.3 Audit date and criteria

The audit was carried out on-site at Dunoon Harbour and Pier on the 23 September 2021. The latest version of the PMSC, and the accompanying Guide to Good Practice (GtGP), has been used as the benchmarking standard within Appendix A. The audit tables also identify the paragraph numbers from the Code (DfT, 2016) and relevant sections of the Guide to Good Practice (DfT, 2018), for cross reference purposes.

In addition, within Appendix B the Health and Safety Executive (HSE) publication L148 'Safety in Docks: Approved Code of Practice and Guidance' (ACOP) (HSE, 2014) and the Port Skills and Safety (PSS) publications SIP 005 'Guidance on Mooring' (PSS, 2020) and SIP 014 'Guidance on Safe Access and Egress' (PSS, 2019) have been used. The appendix tables to this report contain the test questions and evidence, noting down conformity, non-conformity and observational remarks.

2.4 Auditor

The following auditor conducted this audit.




Team Member	Initials	Company, Designation
Monty Smedley	MJS	ABPmer, Principal Maritime Consultant Lead Auditor for Quality Management Systems (QMS ISO 9001) Designed Person (PMSC) Argyll and Bute Council

2.5 Auditees

The following individuals participated in the audit.

Team Member	Initials	Role/Designation
Allan Finlay	AF	Piers and Harbours – Technical Officer
Julie Hendry	JH	Marine Operations – Admin Officer
Paul Lambert	PL	Dunoon – Harbour Master
Scott Reid	SR	Marine Operations Manager

3 Audit Summary

Number	Key Measures Ten-Point 'Health Check'			
1	Duty Holder	0	2	5
2	Designated Person	0	2	2
3	Legislation	1	3	4
4	Duties and Powers	1	19	33
5	Risk Assessment	2	2	3
6	MSMS	0	6	10
7	Review and Audit	0	1	4
8	Competence	0	9	3
9	Plan	1	0	2
10	Aids to Navigation	0	0	2
Total		5	44	68

The summary presented in the above table identifies that, for the ten-point health-check, Argyll and Bute Council as the Statutory Harbour Authority for Dunoon Harbour and Pier is found **not to be fully compliant** with the requirements of the Port Marine Safety Code.

The following non-compliances were recorded:

- A copy of Dunoon's local legislation in the form of Acts and Orders is not held. It is recommended that local Acts and Orders, relevant to Dunoon Harbour and Pier are located and copies retained in the Council's legal archive, with a local copy available to the Dunoon Harbour Master and team for reference.
- The MSMS does not list relevant Acts or Orders for Dunoon, nor are the harbour limits shown. The MSMS must contain information on the local legislation for Dunoon and expand upon the powers, duties and responsibilities provided by the local Acts and Orders.
- The MSMS does not state the expected review frequency for marine risk assessments. The MSMS does state in its Annexes for each port that: *"The Harbour staff will record all incidents/accidents/near misses on the Safety Management System (MarNIS). The reports will be used to review accidents and incidents, for assessing whether any action is necessary to reduce the risk of recurrence"*. It can be concluded that marine risk assessments are reviewed after incidents occur, however the MSMS does not state that the risk assessments are updated or re-issued. The MarNIS system provides notification of assessments which are about to expire, based on a one-year review frequency. Users may set their own review frequency.
- The MSMS does not address dynamic risk assessment [see the GtGP (DfT, 2018) Section 4.4].
- The 'Marine Safety Plan' for the years 2018 to 2020 (the previous plan) has not been assessed and the Organisation's performance against the plan published.

The PMSC audit identified 44 observations relating to improvement opportunities for management consideration, the detailed findings being presented in Appendix A. Marine operations and quayside checks were also carried out, 2 observations were identified, the detailed findings being presented in Appendix B.

The following points identify the more significant items:

- Marine risk assessment creation and review (via MarNIS) is the role of the Harbour Master at Dunoon. Knowledge and experience within the Dunoon Team should be broadened to provide a wider skills base.
- The review process has limited involvement from others, the experience and knowledge of the Pier Operatives should be used along with that of other relevant harbour users. Participants in the review should be included in the risk assessment attendees and notes section.
- The MSMS contains various sections of national guidance, some of which are generic in nature and not tailored to A&BC's specific circumstances. The MSMS should be fully reviewed to remove extraneous information and provide tailored procedures to each port, harbour and pier.
- It is not clear if the 'policy' within the MSMS has been approved by the Harbour Board and Duty Holder, nor is it clear at what frequency this policy is reviewed. It is recommended that policy is separated from the body of the MSMS manual and presented as a policy pack (or similar).
- The training matrix does not include the roles of the Duty Holder, the Marine Operations Manager, Technical Officers, Senior Pier Operatives and the Marine Operations Admin Officer.
- The training records worksheet (would appear) to document Harbour Masters and Assistant Harbour Masters, plus the Marine Operations Admin Officer. Other personnel are not included. The Harbour Authority should consider how it wishes to maintain staff training records. Evidence suggest that some roles are monitored centrally (for example, Harbour Masters) with Pier/Marina Operatives monitored at a local level.
- Marine facility inspections at Dunoon includes Port Riddell, which is not recorded on the inspection sheet. It is unclear if Port Riddell is on A&BC's asset register.
- The appointment letter for the statutory role of Harbour Master does not include reference to appointment by the Harbour Authority under relevant local Acts and Orders.
- There is an informal set of user guidelines for Dunoon, written in the form of General Directions. This information would be useful to formalise and issue to the harbour stakeholders as 'navigational guidelines'.
- Should Pier Operatives work on the quayside or outside of the barrier area on the linkspan, the risk assessment for quayside working should be reviewed to consider if additional PPE is required.

The following points of best practice are noted:

- Provision and maintenance of Aids to Navigation is recognised as an area of best practice with a 100% availability for Category 3 and 99.6% for Category 2 Aids.
- All eight Councillors of the Harbour Board, plus the Council's Executive Director of Development and Infrastructure Services (as Duty Holder) have attended Duty Holder Training. The Marine Safety Plan has an objective of 100% attendance for Duty Holder training.
- A set of 16 marine risk assessments are in place for the harbour, all assessments were in-date at the time of audit. Review dates are staggered throughout the year. The hazard scenarios cover a range of foreseeable eventualities based on current harbour activities and past incidents. This is considered to be an area of best practice.

4 References

DfT, 2016. Port Marine Safety Code, Department for Transport (DfT) a, November 2016.

DfT, 2018. A Guide to Good Practice on Port Marine Operations Prepared in conjunction with the Port Marine Safety Code 2016, Department for Transport (DfT), February 2018.

Health and Safety Executive (HSE), 2014. 'Safety in Docks: Approved Code of Practice and Guidance' (ACOP)', Publication L148.

ISO 9001: Quality Management Systems. International Organization for Standardization.

MCA, 2018. Navigation: Vessel Traffic Services (VTS) and Local Port Services (LPS) in the United Kingdom. Marine Guidance Note: MGN 401 (M+F) Amendment 2. Maritime & Coastguard Agency, October 2018.

Ports of Scotland, 2020. Yearbook, 39th Edition.

Port Skills and Safety (PSS), 2019. Guidance on Safe Access and Egress, SIP 014. September 2019.
<https://www.portskillsandsafety.co.uk/resources/sip014-guidance-safe-access-and-egress>

Port Skills and Safety (PSS), 2020. Guidance on Mooring, SIP 005. November 2020.
<https://www.portskillsandsafety.co.uk/resources/sip-005-guidance-mooring-operations>

4.1 Websites

https://spatialdata.gov.scot/geonetwork/srv/eng/catalog.search#/metadata/Marine_Scotland_FishDAC_1655

<https://www.argyll-bute.gov.uk/marine-safety-management-system>

<https://www.argyll-bute.gov.uk/moderngov/ieListDocuments.aspx?CId=567&MId=14305>

<https://www.argyll-bute.gov.uk/ports-and-harbours-vessels/ports-and-harbours-rates-vessels>

<https://www.gov.uk/maib-reports/grounding-of-general-cargo-vessel-jackie-moon-off-dunoon-breakwater-in-the-firth-of-clyde-scotland>

5 Abbreviations/Acronyms

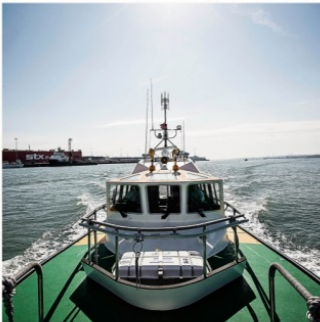
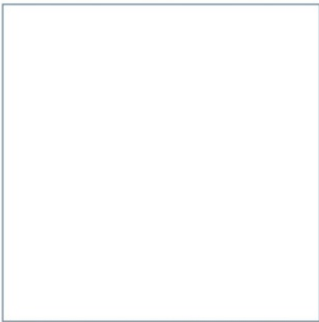
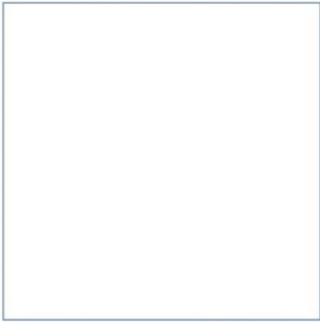
A&BC	Argyll and Bute Council
ACOP	Approved Code of Practice and Guidance
ALRS	Admiralty List of Radio Signals
AtoN	Aid(s) to Navigation
BPA	British Ports Association
CARP	Critical Activity Recover Plan
CAT	Category
CERS	Consolidated European Reporting System
CFL	CalMac Ferries Limited
CHA	Competent Harbour Authority
DfT	Department for Transport
DGHAR	Dangerous Goods in Harbour Areas Regulations 2016
DRA	Dynamic Risk Assessment
DSHAR	Dangerous Substances in Harbour Areas Regulations 2016
FRA	Formal Risk Assessment
GLA	General Lighthouse Authority
GtGP	Guide to Good Practice on Port Marine Operations
HDPCA	Harbour, Docks and Piers Clauses Act 847
hi-viz	High-visibility
HR	Human Resources
HSE	Health and Safety Executive
IMO	International Maritime Organization
ISO	International Organization for Standardization
KPI	Key Performance Indicator
LATON	Local Aids to Navigation
LLA	Local Lighthouse Authority
LPS	Local Port Service
LSE	Lifesaving Equipment
M+F	Merchant Shipping and Fishing Vessels
MAIB	Marine Accident Investigation Branch
MarNIS	Maritime Navigation and Information Services
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Notes
MSMS	Marine Safety Management System
MV	Motor Vessel / Merchant Vessel
n/a	Not Applicable
NMPI	National Marine Plan Interactive
OPRC	International Convention on Oil Pollution Preparedness, Response and Co-operation
PEC	Pilotage Exemption Certificates
PFSP	Port Facility Security Plan
PMSC	Port Marine Safety Code
PPE	Personal Protective Equipment
PSS	Port Skills and Safety
QMS	Quality Management System
RATSA	Railways and Transportation Safety Act
SAC	Special Areas of Conservation
SEPA	Scottish Environment Protection Agency

SHA	Statutory Harbour Authority
SIP	Safety in Port
SOSREP	Secretary of State's Representative
SPA	Special Protection Areas
SWL	Safe Working Load
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
VHF	Very High Frequency
VTSS	Vessel Traffic Service

Cardinal points/directions are used unless otherwise stated.

SI units are used unless otherwise stated.

Appendices



Innovative Thinking - Sustainable Solutions

A Detailed Audit Findings

A.1 PMSC Section 1 – Accountability for Marine Safety

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
1.3-1.5	Duties and Powers	Is the Organisation’s Duty of Care for users of the harbour, port of facility stated?	Satisfactory – A&BC’s Marine Safety Management System (MSMS), version 11, issued in May 2020, states in Section 10 under the heading Conservancy that: <i>“There is a duty to conserve a harbour so that it is reasonably fit for use as a port, and a duty of reasonable care to see that the harbour is in a fit condition for vessels to use”.</i>		MJS_001	MJS
		Are local Acts and Orders identified?	Non-compliance – the harbour does not hold a copy of its local legislation. Internet searches have identified the following legislation: <ul style="list-style-type: none"> ▪ The Pier and Harbour Orders Confirmation (No. 2) Act, 1895 – Schedule 3 Dunoon Construction of Piers. ▪ Dunoon Burgh Pier Order 1896. ▪ Pier and Harbour Orders Confirmation (No. 2) Act, 1906 - Part 2, Dunoon Burgh Harbour Order. 	Recommendation – the local Acts and Orders, relevant to Dunoon Pier and Harbour are located and copies retained in the Council’s legal archive, with a local copy available to the Dunoon Harbour Master and team for reference.	MJS_001	MJS
		Is the Harbour, Docks and Piers Clauses Act (HDPCA) 1847 incorporated into local Acts and Orders?	Satisfactory – some sections of the ‘Dunoon Burgh Harbour Order 1906’ have been located. With respect to incorporation of the HDPCA into local Acts and Orders, it is noted that: <ul style="list-style-type: none"> ▪ The 1906 Act Section 20(1) references powers under the HDPCA to create Byelaws. ▪ The following sections of the HDPCA are known to be incorporated into local Acts and Orders: 25, 26, 28, 99 ▪ The 1906 Act Section 20(4) states that Section 84 and 85 of the HDPCA are not incorporate; Section 46(1) states that Section 16 to 19 are not incorporated. 		MJS_004	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 1.3-1.5	Cont. Duties and Powers	Is the Harbour, Docks and Piers Clauses Act (HDPCA) 1847 incorporated into local Acts and Orders?	Observation – it is not known how many sections of the HDPCA 1847 are incorporated into local Acts and Orders. Hence, the full scope of powers and duties cannot be ascertained.	Recommendation – following the acquisition of all relevant local Acts and Orders, a list of incorporated sections of the HDPCA 1847 should be made. These sections will need to be incorporated into the relevant section of the MSMS for Dunoon.	MJS_004	MJS
1.6 – 1.7	The Duty Holder	Has the organisation appointed and confirmed who the Duty Holder is?	Satisfactory – A&BC has assigned the post and accountability of the Duty Holder to the Council’s Executive Director of Development and Infrastructure Services. The Harbour Board retains responsibility for providing policy direction to the officers of the Authority. An organisational structure is provided the MSMS, Section 2.1.		MJS_001	MJS
1.8	The Duty Holder	Are the Duty Holder’s responsibilities for compliance with Code defined?	Satisfactory – the MSMS, Section 2.2 lists the duties of the Duty Holder. Observation – the role laid out in the MSMS for the Duty Holder does not include all the bullet point requirements listed in the Code (DfT, 2016).	Observation – to ensure a match between the role, as laid out in the Code, and the role defined in the MSMS, it is recommended that Section 2.2. is reviewed.	MJS_001	MJS
1.10	The Duty Holder	Does the Duty Holder (and Harbour Board members) have a clear understanding of the port’s marine activities and MSMS?	Satisfactory – the Harbour Board and Duty Holder receive information from officers of the Authority, presented as technical reports to Board Meetings. Annually the Harbour Board and Duty Holder visit one of the Councils ports, harbours or piers. The last visit was organised in Oban on 24 September 2021. The MSMS is provided on the Council’s website making it a simple process to view an up to date copy.		MJS_001	MJS
		Has the Duty Holder (Harbour Board members) been provided with a clear brief or training on their role under the requirements of the Code?	Satisfactory – all eight Councillors of the Harbour Board, plus the Council’s Executive Director of Development and Infrastructure Services (as Duty Holder) have attended training run on 14 May 2021. The Marine Safety Plan has an objective of 100% attendance on the Duty Holder training course by the completion date of the plan. This is an area of best practice.		MJS_002 MJS_006	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
1.11-1.12	The Designated Person	Has the Harbour Authority appointed an individual as the Designated Person?	<p>Satisfactory – the Duty Holder has appointed ABPmer to provide Designated Person services, with Monty Smedley as the named Designated Person. This contract commenced on 01 November 2021. The Designated Person’s contact details were posted on the Dunoon staff mess-room notice board.</p> <p>Observation – the Designated Person’s contact details are not available to the harbour community (stakeholders).</p>	<p>Recommendation – the Designated Person’s contact details are made available, for example, on the Council’s website.</p>	n/a	MJS
		Is the Designated Person’s role explained in the MSMS?	<p>Satisfactory – the MSMS, Section 2.5 lists the duties of the Designated Person.</p> <p>Observation – the appointment information in Section 2.5 of the MSMS is not accurate.</p>	<p>Recommendation – the Designated Person’s details in the MSMS are updated.</p>	MJS_001	MJS
1.13	Chief Executive [or equivalent]]	Have executive and operational responsibilities for marine safety been clearly assigned?	<p>Satisfactory – the MSMS, Section 2.2 lists the responsibilities of the Duty Holder, who is also the Chief Executive.</p> <p>Observation – the MSMS, Section 2.2 does not address the financial and resource role that typically, a Chief Executive would be responsible for providing in respect of a Harbour Authority function.</p>	<p>Recommendation – the role profile in the MSMS is reviewed and wording around ‘adequate resources’ is included.</p>	MJS_001	MJS
		How is marine safety funded within the organisation?	<p>Satisfactory – funding is identified and agreed through the Council’s approvals process. Officers of the Authority have delegated spending powers within their spending limits. All significant funding decision outside of spending limits come to the Harbour Board, officers of the Authority provide technical input to Harbour Board decisions.</p>		n/a	MJS
1.9, 1.14 – 1.15	Harbour Master	Have executive and operational responsibilities for marine safety been clearly assigned?	<p>Satisfactory – the MSMS, Section 2.5 states that: <i>“Harbour Masters and their Assistants will support the Marine Operations Manager to develop the team’s service plans by working in partnership with colleagues (within and out with the service) and by taking personal responsibility for planning how these are delivered effectively and efficiently”</i>. Section 2.5 lists specific duties.</p>		MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 1.9, 1.14 – 1.15	Cont. Harbour Master	Does an officer with responsibilities for marine safety attend Board meetings?	Satisfactory – three times a year, a report is provided by the Executive Director for Roads and Infrastructure; major issues are raised to the Harbour Board. Evidence from the Harbour Board meeting of 02 September 2021 identifies reports including the Marine Asset Management Plan, Oban Bay Harbour Authority Proposal and the Port Marine Safety Code report (which includes a Designated Person Briefing note).		MJS_006 MJS_007 MJS_009 https://www.argyll-bute.gov.uk/moderngov/ieListDocuments.aspx?CId=567&Mid=14305	MJS
1.16 – 1.17	The Organisation's Officers	Does the MSMS provide details of the organisation's Officers and their responsibilities for marine safety?	Satisfactory – the MSMS, Section 2.3 lists the responsibilities of the Organisation's Officers (including the Head of Roads and Amenity Services and the Marine Operations Manager). Section 2.4 has a sub-heading for Assistant Harbour Masters. Observation – the role of the Technical Officer(s) for Piers and Harbours could be usefully included within the MSMS.	Recommendation – include the role of the Technical Officer(s) for Piers and Harbours.	MJS_001	MJS

A.2 PMSC Section 2 – Key Measures Needed to Secure Marine Safety

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
2.2	Further guidance	Does the organisation review any of the following: <ul style="list-style-type: none"> MAIB digest / reports MCA health check trends 	<p>Satisfactory – the MCA Health Checks trends was included in the Designated Person’s briefing note which was tabled at the 02 September 2021 Harbour Board meeting. Evidence sighted. Information from the MAIB and the BPA in the former of safety circulars are distributed by the Marine Operations Admin Officer. Evidence sighted.</p> <p>Observation – it would be useful to brief Dunoon harbour staff on any relevant MAIB or BPA information as part of the Dunoon monthly team briefing.</p>	<p>Recommendation – adding to the standing agenda for the Dunoon monthly team briefing.</p>	MJS_008 MJS_010	MJS
2.3 – 2.6	Review existing powers	Does the Harbour Authority have an understanding of local legislation?	<p>Satisfactory – the Harbour Authority has a list of local Acts and Orders for Dunoon, plus an Ordnance Survey map with the extent of the harbour limits shown.</p>		MJS_003 MJS_005	MJS
		Are local Acts and Harbour Orders referenced in MSMS?	<p>Non-compliance – the MSMS does not list relevant Acts or Orders for Dunoon, nor are the harbour limits shown.</p>	<p>Recommendation – the MSMS must contain information on the local legislation for Dunoon and expand upon the powers, duties and responsibilities provided by the local Acts and Orders.</p>	MJS_001	MJS
		Have the Harbour Authority’s existing powers been reviewed?	<p>Satisfactory – the last revision of local Acts and Orders at Dunoon was in 1906. As a Council wide exercise, a project to modernise local legislation by replacing it with a new single Act is being progressed. Evidence sighted.</p> <p>Observation – it is not known if Council Legal Services hold copies of the Dunoon Harbour Acts and Orders.</p>	<p>Recommendation – providing the local Acts and Orders to Council Legal Services for retention in Council records.</p>	MJS_004	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 2.3 – 2.6	Cont. Review existing powers	Cont. Is the organisation's jurisdiction mapped and clear?	Satisfactory – the Council has clear information on the harbour limits, evidence of this provided. Harbour limits are also shown on the Marine Scotland National Marine Plan Interactive (NMPI) portal. Observation – the harbour limits are not shown on the Admiralty Chart No.1994, 'Approaches to the River Clyde' nor are limits on the Admiralty Chart No. 3746 'Loch Long and Loch Goil'.	Recommendation – provide information to the UK Hydrographic Office (UKHO) to allow the inclusion of harbour limits on nautical charts.	MJS_003 https://spatialdata.gov.scot/geonetwork/srv/en/catalog.search#/metadata/Marine_Scotland_FishDAC_1655	MJS
2.7 – 2.11	Use of Formal Risk Assessment (FRA)	Have risks associated with marine operations been assessed and a means of controlling them deployed?	Satisfactory – the MSMS, Section 8 describes the assessment methodology. A set of 16 risk assessments are in place for the harbour, all assessments were in-date at the time of audit. Review dates are staggered throughout the year. The hazard scenarios cover a range of foreseeable eventualities based on current harbour activities. This is considered an area of best practice.		MJS_001 MJS_011 MJS_012 MJS_013	MJS
		How does the organisation ensure those undertaking marine risk assessment are competent in the role?	Satisfactory – the Harbour Master has undertaken two training courses for marine risk, completed on 02 September 2019 and 02 March 2021. Certificates sighted. Observation – responsibility for marine risk assessment (via MarNIS) is included within the role of the Harbour Master at Dunoon. Knowledge and experience in updating and creating marine risk assessments should be broadened to provide a wider skills base at Dunoon.	Recommendation – the skills base of the Dunoon harbour team around marine risk assessments is broadened.	MJS_001 MJS_014 MJS_015	MJS
		Are stakeholders included in marine risk review/assessments?	Satisfactory – risk assessments are conducted with the Assistant Harbour Master. Observation – the review process has limited involvement from stakeholders and would benefit from wider engagement from pier operatives and users.	Recommendation – the experience and knowledge base of the Pier Operatives should be used in marine risk assessment review. Consider including relevant harbour users. Participants in the review should be included in the risk assessment attendees and notes sections.	MJS_001 MJS_011	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 2.7 – 2.11	Cont. Use of Formal Risk Assessment (FRA)	Does the MSMS prescribe the review frequency for risk assessments?	Non-compliance – the MSMS does not state the expected review frequency for marine risk assessments. The MSMS does state in its Annexes for each port that: <i>“The Harbour staff will record all incidents/accidents/near misses on the Safety Management System (MarNIS). The reports will be used to review accidents and incidents, for assessing whether any action is necessary to reduce the risk of recurrence”</i> . It can be concluded that marine risk assessments are therefore reviewed after incidents occur, however it does not state that the risk assessment is updated or re-issued, nor is any review frequency given. The MarNIS system provides notification of assessments which are about to expire, based on a standard one-year review frequency. Users may set their own review frequency	Recommendation – the Harbour Authority expectation for frequency of risk assessment review is positively stated in the MSMS for the avoidance of doubt, for example: Marine Risk Assessment must be reviewed annually and following an accident or incident that changes the specifics of an existing risk assessment.	MJS_001	MJS
		Is a system of Dynamic Risk Assessment (DRA) used and included in the MSMS?	Non-compliance – the MSMS does not address the expectations of the Harbour Authority in respect to DRA.	Recommendation – the approach to Dynamic Risk Assessment is defined for harbour staff.	MJS_001	MJS
2.12-2.14	Implement a MSMS	Is there an MSMS? Does this incorporate policies and procedures? The MSMS must incorporate a regular and systematic review of its performance.	Satisfactory – A&BC’s Marine Safety Management System (MSMS) is issued as version 11, dated May 2020. A revision history is included with notes defining changes made over time. The MSMS is presented as a manual and supporting Annexes for individual ports, harbours and piers. Observation – the distribution list contains names of post holders which is out of date. Observation – the MSMS contains various sections of national guidance, some of which is generic in nature and not tailored to A&BC’s specific circumstances.	 Recommendation – the distribution list should be reviewed with posts and roles updated as required. Recommendation – the MSMS should be fully reviewed to remove extraneous information and provide tailored procedures to each port, harbour and pier.	MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
2.15	Key Performance Indicators (KPIs)	Does the harbour authority detail KPIs and/or make a statement about performance in the organisation's annual report?	<p>Satisfactory – A&BC's key performance indicators for ports and harbours are identified in the 'Marine Safety Plan' as specific objectives with measurable outcomes.</p> <p>Observation – the MSMS does not address port and harbour KPIs.</p>	<p>Recommendation – a section on KPIs should be included within the MSMS, with reference to the expectations of internal business processes and the 'Marine Safety Plan'.</p>	MJS_001 MJS_002	MJS
2.16	MSMS assigning responsibility	Does the MSMS explicitly assign responsibility for appropriate safety/conservancy matters?	<p>Satisfactory – the MSMS, Section 2 'Key Personnel and Responsibilities' assigns responsibility for safety and conservancy to key post holders in the Harbour Authority.</p>		MJS_001	MJS
2.17	MSMS Consultation	Are forum/consultation meetings held?	<p>Satisfactory – the MSMS Section 4 addresses 'Consultation', with sections on consultation policy, statutory consultation and consultation with interested parties. At Dunoon, a Pier User Group is established. This group is consulted on an annual basis. Stakeholders include CFL, The Waverly and Shearwater Divers. The last meeting was July 2021 (held remotely), evidence sighted.</p>		MJS_001 MJS_016	MJS
2.18	Competence standards	Are personnel qualified and trained for their marine safety role?	<p>Satisfactory – a training matrix is provided for the Harbour Authority, this identifies the Essential, Required, Advantageous and Not Required training. Harbour Masters, Assistant Harbour Masters and Pier Operatives/Marina Operatives are identified. The training matrix is considered to be well-structured and laid out in an easy to follow format.</p> <p>Observation – the matrix does not include the roles of the Duty Holder, the Marine Operations Manager, Technical Officers, Senior Pier Operatives and the Marine Operations Admin Officer. All of which have defined responsibilities and safety roles.</p>	<p>Recommendation – review the matrix to ensure it documents all job roles with a remit for delivering marine safety functions for the Harbour Authority.</p>	MJS_001 MJS_014 MJS_015	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 2.18	Cont. Competence standards	Are personnel qualified and trained for their marine safety role?	<p>Observation – it is not clear what the terms ‘Essential’ and ‘Required’ mean on the matrix.</p> <p>Observation – the training matrix identifies roles and named individuals. As the matrix is a list of training against specific job roles, the names of individual post-holders are not necessary.</p> <p>Observation – the MSMS, Section 6.3 states that: <i>“The ARGYLL & BUTE HARBOUR BOARD will maintain a training matrix for all staff and the respective line managers are responsible for keeping it up-to-date”</i>. The training matrix is maintained by the Marine Operations Admin Officer, with notification of training completed provided by Harbour Masters.</p>	<p>Recommendation – provide definitions for the terms used on the matrix for the avoidance of doubt.</p> <p>Recommendation – the removal of names from the Harbour Authority’s training matrix (note: training records do require individual named employees).</p> <p>Recommendation – review the wording of the MSMS Section 6.3 and updated to the current process.</p>	MJS_001 MJS_014 MJS_015	MJS
		Is there a policy on revalidation or maintenance of qualifications in place?	<p>Satisfactory – the MSMS, Section 6.1 is titled ‘Argyll and Bute Council Training Policy’. The bullet pointed items in the training policy are considered to be comprehensive.</p> <p>Observation – it is not clear if the ‘policy’ within the MSMS has been approved by the Harbour Board and Duty Holder, nor is it clear at what frequency this policy is reviewed.</p>	<p>Recommendation – the policy is separated from the body of the MSMS manual and presented as part of a policy pack.</p>	MJS_001	MJS
			<p>Satisfactory – the Marine Operations Admin Officer maintains a central record of training. The sheet contains two worksheets (tabs), the first documents training records and the second documents role requirements. Individual staff are identified with dates of training and certification held in day/month/year format. In addition, at Dunoon the Harbour Master keeps a local record of all staff training.</p> <p>Observation – it is not clear if the ‘role requirement’ tab in the Training Record spreadsheet is current or has been superseded by the separate spreadsheet ‘Harbour Training Matrix 2021’.</p>	<p>Recommendation – any redundant information or tabs are removed. One version of the matrix prevents ambiguity.</p>	MJS_001 MJS_014 MJS_015 MJS_019	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 2.18	Cont. Competence standards	Is there a list of the organisation's staff, training received, qualifications held and/or experience required for their role?	<p>Observation – the training records worksheet (tab) indicates the date of attendance on courses, qualifications expiring are shown in red.</p> <p>Observation – the layout of the 'Training Records' could be improved by adopting the same or similar list as used in the matrix. This would allow for an easier comparison.</p> <p>Observation – the training records worksheet (would appear) to document Harbour Masters and Assistant Harbour Masters, plus the Marine Operations Admin Officer. Other personnel are not included.</p>	<p>Recommendation – the addition of attendance and expiry dates (as two columns) to clarify information.</p> <p>Recommendation – organising the training record sheet to match the training matrix course list.</p> <p>Recommendation – the Harbour Authority considers how it wishes to maintain staff training records. Evidence suggest that some roles are monitored centrally (for example, Harbour Masters) with Pier/Marina Operatives monitored at a local level.</p>	MJS_001 MJS_014 MJS_015 MJS_019	MJS
2.19 – 2.22	Incident reporting and investigation	Does the MSMS identify the organisation's instruction regarding: <ul style="list-style-type: none"> ▪ reporting ▪ recording of incidents ▪ investigation ▪ enforcement (if relevant). 	<p>Satisfactory – the MSMS Section 3.6 details the process to follow should an incident occur, this addresses reporting. The MSMS Section 9.2, 9.3, 9.6 and 9.7 details incident procedures and investigation. Incident records from Dunoon identify the following (noting that the 2017 and 2018 records are recorded in MarNIS):</p> <ul style="list-style-type: none"> ▪ 2004: Cargo vessel allision with breakwater. ▪ 2009: Waverley allision with the breakwater. ▪ 2017: MV Coruisk (ferry) near miss (impact) due to loss of power on approach to Dunoon berth. ▪ 2018: Alicat (ferry) engine room fire on approach to Dunoon berth. <p>Observation – incidents occurring prior to the active use of MarNIS are not contained within the harbour's records at Dunoon. To provide a long-term incident trend, it would be useful to retrospectively add records where this effort is not a significant undertaking.</p>	<p>Recommendation – the retrospective addition of incident records to the MarNIS database.</p>	MJS_017 MJS_018 MJS_019 https://www.gov.uk/maib-reports/grounding-of-general-cargo-vessel-jackie-moon-off-dunoon-breakwater-in-the-firth-of-clyde-scotland	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
GtGP 13.2	Incidents involving Death or Crime	Are procedures in place for incidents involving death or crime?	Satisfactory – the MSMS Section 9.8 details actions to be taken in the event of death or crime. Anecdotal information from Dunoon suggests that local police liaison is good with the Harbour Master and team regularly in contact with local police resources.		MJS_001	MJS
GtGP 13.9	Incident publication	Does the Harbour Authority disseminate information from accident investigations?	Satisfactory – incident reports are distributed to the Scottish Environment Protection Agency (SEPA) and the Maritime and Coastguard Agency (MCA) as required. Evidence of the MV Ali Cat provided.		MJS_017	MJS
2.23	Incident statutory reporting	Are procedures for reporting incidents to the MAIB in place?	Satisfactory – the MSMS Section 9.10 details statutory reporting requirements, including the Marine Guidance Note (MGN) 564 'Incident reporting and investigation'. The last MAIB report was made in 2018 for the MV Alicat engine room fire.		MJS_001 MJS_017	MJS
2.24	Monitoring performance and auditing	Has the MSMS been subject to audit (internal and/or external)?	Satisfactory – the last external audit of the MSMS was conducted in October 2018 at: Campbeltown, Oban, Port Beag, Cuan Ferry Slip and Easdale Ferry. This meets the expectation of the GtGP for an external audit every three years. The last internal audit was carried out at Dunoon on 23 July 2021. The Internal Audit was a comprehensive check against the Guide to Good Practice (DfT, 2018).		MJS_020 MJS_021 MJS_022 MJS_045	MJS
2.25	Enforcement	Are local officers aware of enforcement powers and responsibilities?	Satisfactory – the MSMS Section 9.12 provides the enforcement procedure. Observation – text within the MSMS provides outline requirements. There is no specific actions for Dunoon with respect to enforcement. This links to topics of duties and powers, local legislation and byelaws.	Recommendation – the development of Dunoon specific information on expectations around enforcement.	MJS_001	MJS
		Is there a policy on enforcement and prosecution in place?	Satisfactory – the MSMS, Section 9.11 is titled 'Enforcement Policy'. Observation – it is not clear if the 'policy' within the MSMS has been approved by the Harbour Board and Duty Holder, nor is it clear at what frequency this policy is reviewed.			

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
2.26	Publication of plans and reports	Does the organisation commit itself to developing policies and procedures to satisfy the requirements of the Code?	Satisfactory – this requirement is evidence through the publication of PMSC policy and plans on the Council's website.		https://www.argyll-bute.gov.uk/marine-safety-management-system	MJS
2.27	Plan assessment	Is an assessment of the organisation's performance against the plan published?	Non-compliance – the 'Marine Safety Plan' for the years 2018 to 2020 (the previous plan) has not been assessed and the Organisation's performance published.	Recommendation – a review of the previous plan for the years 2018 to 2020 is assessed and published.	n/a	MJS
2.28	Safety plan for marine operations	Is a 'Safety Plan for Marine Operations' published (every three years).	Satisfactory – a signed and issued 'Marine Safety Plan' approved by the Harbour Board on 04 March 2021 is hosted on the Council's website. The plan covers the years 2021 to 2023.		MJS_002	MJS
2.29	Consensus	Has the Harbour Board maintained consensus with harbour users?	See response in this Audit report, Section 2.17 on Consultation.		MJS_016	MJS
2.30 – 2.32	Monitoring compliance	Has the Harbour Authority confirmed compliance with the PMSC for the port to the MCA within the last three years?	Satisfactory – the Council wrote to the MCA to confirm its current state of compliance with the Code. Letter evidenced.		MJS_023	MJS
GtGP 2.2.3 (also, Code Executive Summary)	Monitoring compliance	Has the Harbour Authority confirmed all organisations with its jurisdiction comply with the requirements of the Code?	Satisfactory – there are no other Organisations operating marine facilities within the jurisdiction of the Harbour Authority.		n/a	MJS

A.3 PMSC Section 3 – General Duties and Powers

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
3.1 – 3.4	Safe and Efficient Port Operations	Does the Duty Holder have regard to efficiency, economy and safety of operation in respect to the services and facilities provided?	<p>Satisfactory – a commitment to 'safe and efficient' port operations is made in the MSMS within the hydrographic policy and within individual port, harbour and Pier Annexes. Checking of the pier and breakwater is part of the pier asset inspection regime.</p> <p>Observation – the inspection includes Port Riddell, which is not recorded on the inspection sheet. It is unclear if Port Riddell is on A&BC's asset register.</p>	<p>Recommendation – if Port Riddell is in the ownership of A&BC, it should be added to the Council's asset list. Any inspection of assets (such as Port Riddell) should be recorded.</p>	MJS_001 MJS_041	MJS
3.5	Open port duty	Is the port or harbour subject to Open Port Duty?	<p>Satisfactory – it is not known if A&BC as Harbour Authority at Dunoon has an Open Port Duty under Section 33 of the 'Harbours, Docks and Piers Clauses Act 1847'. It is inferred that this duty exists as harbour dues are charged for use of the harbour area by vessels.</p> <p>Observation – the inclusion of open port duty cannot be confirmed without reference to the Dunoon's local Acts and Orders.</p>	<p>Recommendation – following location of Dunoon's local Acts and Orders, inclusion of Section 33 should be established and information added to the relevant section of the MSMS.</p>	MJS_001 MJS_002	MJS
3.6 – 3.6	Conservancy duty	How does the harbour authority conserve the harbour?: <ul style="list-style-type: none"> ▪ Survey as necessary ▪ Place navigation marks ▪ Keep 'vigilant watch' for any seabed changes ▪ Keep hydrographic records ▪ Ensure hydrographic information is published ▪ Update UKHO. 	<p>Satisfactory – the MSMS, Section 10, details the Harbour Authority's approach to conservancy. This includes conservancy duty, hydrographic survey policy, dredging, Aids to Navigation (AtoN), wreck removal, dangerous vessels and licensing marine works. The last bathymetric survey was conducted on 12 February 2020. Information was passed by the survey contractor to UKHO. Evidence sighted.</p>		MJS_001 MJS_024 MJS_025	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
3.7	Updates provided to UKHO	Does the organisation have an Agreement with UKHO, and/or do they provide survey information to UKHO?	Satisfactory – a bilateral agreement between A&BC and the UKHO is in place, dated 17 March 2017.		MJS_026	MJS
GtGP 1.9.11, and 7.8	Licensing, Regulating Harbour Works and Dredging?	Does the harbour authority have the power to licence works?	Satisfactory – there is no evidence that A&BC as Harbour Authority at Dunoon has any powers to licence marine works under its local Acts and Orders. There is no licence held for the disposal of dredged material at sea.		MJS_005	MJS
3.8	Environmental duty	Does the Organisation understand its obligations: <ul style="list-style-type: none"> ▪ Nature conservation Section 48A of Harbours Act 1964 ▪ Obligations for SPA, SACs under Habitat Regs. ▪ the Nature Conservation (Scotland) Act 2004 	<p>Satisfactory – the MSMS, Section 11 is titled 'Environmental Policy' and Section 11.1.1 which provides four bullet points on plans, procedures and policies. Information regarding Dunoon and its local habitat is contained in the Oil Pollution Response plan.</p> <p>Observation – the environmental policy lacks detail on how the obligations of the Harbour Authority under national legislation is delivered.</p> <p>Observation – practical measures for applying the policy (in terms of procedures) are not evident from the MSMS.</p> <p>Observation – training for staff on environmental duties and associated policy and procedures is not in place.</p>	<p>Recommendation – the policy is separated from the body of the MSMS manual and presented as part of a policy pack with improved information linking to obligations under national legislation.</p> <p>Recommendation – develop procedures and link to staff training to implement environmental policy.</p> <p>Recommendation – development of a standardised environmental training delivery for port, harbour and pier employees.</p>	MJS_001 MJS_030 MJS_031	MJS
3.9	Civil Contingency Duty	Does the MSMS include reference to the Harbour Authority's obligations as a Category 2 responder?	Satisfactory – the MSMS includes reference to Civil Contingency duties within supporting port, harbour and pier Annexes.		MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
GtGP 6.2.4, 6.5	Emergency Planning / Pollution control	Does the MSMS include emergency planning and oil pollution response?	Satisfactory – an Oil Pollution Response Plan is in place, which was approved by the MCA on 04 December 2018 and is valid until the 27 November 2023. The annual OPRC return form was evidenced. A&BC maintain a Critical Activity Recover Plan (CARP) which incorporates the Council's Civil Contingency duties.		MJS_027 MJS_032 MJS_046	MJS
Cont. GtGP 6.2.4, 6.5	Cont. Emergency Planning / Pollution control	Does the port/harbour carry out emergency plan exercises?	Satisfactory – a training exercise for oil pollution was carried out on 23 April 2021 which focused on deploying spill kits around outfalls, storm drains and covers. Staff also practised replacing a contaminated boom with a clean boom whilst keeping any oil entrapped. Observation – annual exercises of both the Oil Pollution Response Plan and the Emergency Plan would be beneficial to schedule.	Recommendation – the production of a yearly planner to detail emergency exercises.	MJS_028 MJS_029	MJS
3.10 – 3.11	Harbour Authority Powers review	Has the Harbour Authority reviewed its powers?	See the audit report response in Section 2.3 – 2.6.		n/a	MJS
3.12 – 3.14	Revising Duties and Powers	Evidence of Harbour Revision Orders, or Harbour Closure.	Satisfactory – the last Harbour Revision Order was made in 1906.		MJS_005	MJS

A.4 PMSC Section 4 – Specific Duties and Powers

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
4.2	Appointment of Harbour Master	Is there a Harbour Master appointment for the port?	<p>Satisfactory – an appointment letter for the Harbour Master sighted, confirmed in post by the Council (as Harbour Authority) on 29 November 2004.</p> <p>Observation – the appointment letter for the statutory role of Harbour Master does not include reference to appointment by the Harbour Authority under relevant local Acts and Orders.</p>	<p>Recommendation – consider issuing a letter of appointment for statutory roles, separate to normal Human Resource (HR) letters.</p>	MJS_033	MJS
4.3 – 4.5	Byelaws	Does the organisation have powers to make Byelaws, are these published?	<p>Satisfactory – under Section 20(1) of the Dunoon Burgh Harbour Order 1906, the Harbour Authority may make Byelaws. No Byelaws are known to be issued.</p> <p>Observation – information on powers to make Byelaws is not included in the MSMS Annex on Dunoon.</p>	<p>Recommendation – information describing the powers of the Harbour Authority to make Byelaws is included in the MSMS.</p>	MJS_005	MJS
		Date of last byelaw review?	<p>Not applicable – no Byelaws are known to be issued.</p>		MJS_029	MJS
4.6 – 4.7	Special Directions	Are the Harbour Master's powers of Direction shown in the MSMS, how is delegation identified?	<p>Satisfactory – the MSMS, Section 5.1.3.2, deals with the topic of Special Direction as a high level description stating: <i>"Ports will monitor vessel movements to ensure compliance with all relevant bye-laws and General or Special Directions as well as Pilotage Directions and, where applicable, Local Notices to Mariners"</i>.</p> <p>Observation – the MSMS Annex on Dunoon does not provide information on how powers of Special Direction are used for controlling vessel movements.</p> <p>Observation – typically, powers of Special Direction are conveyed by the HDPCA 1847, Section 52. It has not been possible to establish if this provision is included within local Acts and Orders.</p>	<p>Recommendation – the MSMS Annex on Dunoon expands on Directions and how they are issued/used by harbour staff.</p> <p>Recommendation – review local legislation and conclude if powers of Special Direction are available to harbour staff, following which, delegation of powers from the Harbour Master should be considered.</p>	MJS_002	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
4.8	General Directions	Are the powers of General Directions available to the Harbour?	Not applicable – it is thought that powers of General Direction are not available at Dunoon Harbour?		n/a	MJS
		When were General Directions last reviewed?	n/a		n/a	MJS
4.9	Harbour Directions	Are Harbour Directions used and published?	Not applicable – Harbour Directions have not been applied for.		n/a	MJS
4.10 GtGP 6.4	Dangerous Vessels	Does the MSMS (or other plan) make provision for giving directions to dangerous vessels?	Satisfactory – the Harbour Master has powers under the Dangerous Vessels Act 1985. This is laid out in the MSMS, Section 10.4.4. Observation – information relating to the expected action for the Pier Master in respect of a dangerous vessel should be laid out as a procedure.	Recommendation – the creation of a Standard Operating Procedure based around actions a Pier or Harbour Master should take in respect of a dangerous vessel.	MJS_001	MJS
		Is the role of the SOSREP acknowledged?	Satisfactory – the ‘Secretary of State’ overruling the Harbour Master’s direction is acknowledged in the MSMS, Section 5.1.3.4 Observation – the term SOSREP is not included in the MSMS.	Recommendation – the term SOSREP should be included with an explanation of the role and how this operates in the UK.	MJS_001	MJS
GtGP 6.2	Dangerous Substances	Are there clear requirements for declaration of dangerous goods/substances?	Satisfactory – the declaration of dangerous goods and substances is detailed in the MSMS, Section 5.1.3.6. The Council’s website contains reporting forms for the declaration of dangerous goods. Observation – the MSMS states that: “ <i>Dangerous Substances in Harbour Areas Regulations (DSHAR) 2016</i> ”. The current regulations are the ‘The Dangerous Goods in Harbour Areas Regulations 2016 (DGHAR)’.	Recommendation – updating the MSMS to the latest regulation and acronym.	MJS_001 MJS_042 MJS_043	MJS
GtGP 8.4	Vessel Traffic Management	Is vessel traffic managed within the port area, how is this achieved?	Satisfactory – vessel traffic is monitored and managed through visual observation and communications by VHF. Nearly all traffic to the port is CFL vessel traffic, with the Waverly making three calls a week between June and August, and very occasional workboat and fishing vessel calls. The harbour office is open from 06:45 to 01:30 hrs every day (or hours to match the ferry schedule).		MJS_001 MJS_031	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. GtGP 8.4	Cont. Vessel Traffic Management	Is vessel traffic monitoring information passed to the MCA by the quickest means?	Not applicable – the harbour is not used by any vessels requiring CERS reporting.		n/a	MJS
		Has the need for VTS/LPS been reviewed recently?	Satisfactory – the current method of vessel traffic management has been arranged to meet the demands of harbour use. The formal risk assessment for vessel traffic management is a strategic action in the Marine Safety Plan and is dated for completion by 2023. This strategic action references MGN 401, (MCA, 2018).		MJS_002	MJS
GtGP 13.2.2	Drink and drugs	Do staff know what to do if they suspect that a mariner (master, pilot, seaman) has committed an offence whilst on duty?	Satisfactory – the MSMS references the Railways and Transportation Safety Act (RATSA) 2003. The MSMS, Section 9.8 also references actions to take if a crime has been committed. Observation – there is no specific instruction on the actions to take if a professional mariner is suspected of a drink or drugs offence when on duty.	Recommendation – the creation of a procedure to inform the Authority's officers of their expected action for a drink or drugs offence under the RATSA 2003.	MJS_001	MJS
4.11 GtGP 9.0	Pilotage	Is the port a CHA?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
		Has the requirement for pilotage been reviewed?	Satisfactory – the Dunoon SHA is bordered by Clydeport's SHA, which is also a CHA. Any vessels meeting the requirements to take a Pilot on approach to Dunoon (within Clydeport's CHA) will be managed by Clydeport, including the issue of Pilotage Exemption Certificates (PECs).		n/a	MJS
4.12 GtGP 9.4	Pilotage Directions	Are Pilotage Directions issued?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
4.12 GtGP 9.4	Pilotage Directions	Were stakeholders consulted during the drafting phase of the most recent Pilotage Direction?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
4.13 GtGP 9.4	Authorisation of pilots	Is the process for appointing Pilots referenced in the MSMS?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
4.14 GtGP 9.4.31	Pilot Training	Does the CHA implement the International Maritime Organisation (IMO) resolution A960?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
GtGP 9.5.43	Pilotage	Does the authority operate an effective Pilot Fatigue Management System?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
4.15 – 4.16 GtGP 9.5	Pilot Exemption Certificates	Is a clear process for the issuing of PECs published?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
		Are the requirements equivalent to those for an authorised pilot?	Not applicable – the Organisation is not a Competent Harbour Authority.		n/a	MJS
GtGP 8.7.15 – 8.8.10	Port Passage Plan	Is there a published passage plan?	Satisfactory – information is included in the Port of Scotland publication, the Admiralty List of Radio Signals (ALRS), Volume 6, is up to date for Dunoon. A copy of CFL’s passage plan is held by the Harbour Master. Observation – there is an informal set of user guidelines, written in the form of General Directions. This information would be useful to formalise and issue to the harbour stakeholders as ‘navigational guidelines’.	Recommendation – the review and issue of navigational guidelines to harbour stakeholders.	MJS_034 MJS_035 MJS_036 MJS_037 MJS_038 Ports of Scotland, 2020. Yearbook, 39th Edition.	MJS
GtGP 8.10	Recreational navigation	Are recreational users of the harbour considered?	Not applicable – there is no recreational use of the harbour.		n/a	MJS
4.17 – 4.20	Collecting Dues	Are dues clearly defined?	Satisfactory – charges (including dues) are laid out on the Council’s website. The process for setting charges uses a benchmarking exercise with other local ports. Charges are increased at the rate of inflation.		https://www.argyll-bute.gov.uk/ports-and-harbours-vessels/ports-and-harbours-rates-vessels	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
4.21-4.23	Aids to Navigation	Are defects and rectification of defects recorded?	<p>Satisfactory – as the Local Lighthouse Authority (LLA) the following Aids to Navigation are maintained:</p> <ul style="list-style-type: none"> 1x CAT 2: Fixed Red Vertical lights at the north end of the Victorian Pier. 1x CAT 2: Fixed Red Vertical lights at the end of the breakwater. <p>Checking of the AtoN forms part of the pier asset inspection regime.</p>		MJS_041	MJS
4.24	GLA returns	Are returns made to the GLA?	<p>Satisfactory – the LATON three-year return for A&BC identifies the availability return values as:</p> <ul style="list-style-type: none"> Cat 2 = 99.6% (target is 99%) Cat 3 = 100% (target is 97%) <p>Provision and maintenance of Aids to Navigation is recognised as an area of best practice.</p>		MJS_044	MJS
4.25-4.32	Wrecks, Abandoned or unseviceable vessels	Does the MSMS refer to powers for dealing with wrecks?	<p>Satisfactory – the MSMS addresses wrecks within the Conservancy section and with respect to marking of wrecks. There is no history of wrecks, derelict or abandoned vessels in the harbour.</p> <p>Observation – the MSMS does not contain specific information on dealing with wrecks, derelict or abandoned vessels.</p>	<p>Recommendation – the topic of wrecks, derelict and abandoned vessels is covered by a Harbour Authority procedure.</p>	MJS_001	MJS
GtGP 9.4.17 -9.4.21	Pilot Launches	Do pilot boats meet statutory requirements and appropriate Codes?	<p>Not applicable – the Organisation is not a Competent Harbour Authority and therefore has no requirement to operate a pilot boat.</p>		n/a	MJS
GtGP - 10	Towage Operations	Does the organisation produce towage guidelines?	<p>Satisfactory – the MSMS, Section 13.1.1.6 addresses towage.</p> <p>Observation – the section on towage address Campbeltown only. There is no comment on towage (either routine or non-routine) at other A&BC ports, harbours or piers.</p>	<p>Recommendation – drafting of appropriate towage guidelines for all A&BC ports, harbours or piers.</p>	MJS_001	MJS
		Is there a process for approving towage providers?	<p>Not applicable – there are no towage providers using the harbour.</p>		n/a	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. GtGP - 10	Cont. Towage Operations	Are non-routine tows pre-approved / managed by the organisation?	Satisfactory – the MSMS, Section 13.1.1.6 addresses towage.		MJS_001	MJS
GtGP 1.9.11	Licensing Harbour Tugs?	Does the harbour authority have the power to licence tugs?	Not applicable – there are no known powers to licence tugs.		n/a	MJS
GtGP - 10.4	Diving Operations (commercial)	Is there a process for managing commercial diving?	Satisfactory – the MSMS, Section 13.1.1.7 addresses commercial diving in the harbour. A 'Permission to Dive Permit' for 21 June 2021 was evidenced.		MJS_001 MJS_039	MJS
GtGP - 10.4	Diving Operations (recreational)	Is there a process for managing recreational diving?	Not applicable – there is no history of recreational diving.		n/a	MJS
GtGP - 6.7.3	Hot Work Permits	Is there a process for managing Hot Works?	Satisfactory – the MSMS, Section 13.1.1.2 under 'Mooring Operations' states that: <i>"Where appropriate permission to undertake Hot Work is required for any burning, welding, flame cutting, heating by blow torch and brazing, when it is being done outside the engine room of a vessel. All hot work activities carried out by third parties and other contractors in the port is controlled by a "Hot Work Permit".</i> As hot works are not carried out at Dunoon, there is no history of using the 'Hot Work Permit'.		MJS_001	MJS
GtGP – 6.7.3	Bunkering	Is there a process for managing Bunkering?	Satisfactory – the MSMS, Section 13.1.1.4 states that: <i>"Bunkering may take place within Harbour areas with approval of the Harbour Master or his/her Assistant and Bunkering Operations will follow an Approved Bunkering Procedure provided by the Bunker Fuel Supplier".</i> The Harbour Master at Dunoon stated that bunkering does not occur within the harbour.		MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
GtGP – 11.3, 11.4	Regulation of Port Craft, Pilot Launches and Workboats	Does the Authority have a procedure for regulating port craft?	<p>Satisfactory – the MSMS, Section 13.1.1.5 has a detailed section on the expectations for Boat Licensing.</p> <p>Observation – anecdotal information suggests that workboats do visit the harbour area occasionally, without the knowledge of harbour staff. There is currently no method of obtaining assurance that craft working commercial (i.e., not Council activities) are operating their vessels in accordance with relevant MCA codes.</p>	<p>Recommendation – the Harbour Authority considers the requirements of the Code and GtGP (Section 11.3, 11.4) with respect to regulating third party commercial workboats and launches within its area of jurisdiction and creates a registration scheme for workboats using the Authority's area.</p>	MJS_001	MJS

B Quayside and Marine Operations

Visual observation of the Victorian Pier and the breakwater berth (comprised of the main (north) berth and hammerhead berth) were undertaken during the site visit on the 23 September 2021.

B.1 Quayside Checks

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
PMSC 3.0 GtGP 8.11.19 ACOP 207-208 SIP 014	Access	Is the quayside and its access locations clear of debris and obstructions?	Satisfactory – the breakwater berth is clear of debris. The section of the Victorian Pier open to pedestrians is clear of debris and the surface is appropriate to its use.		MJS
		Pedestrian/Disabled access for passengers or leisure users?	Satisfactory – the breakwater berth has security fence restrictions, preventing the public accessing the berth face. Pedestrian access to the ferry is via the linkspan, which is gated and opened by Pier Operatives on the ferry's arrival.		MJS
		Is the type and condition of quayside surface appropriate to the operation?	Satisfactory – the breakwater berth has open and well-maintained quayside space. The Victorian Pier section open to the public is clear of debris and the surface is appropriate to its use.		MJS
ACOP 211-223 SIP 014	Rescue and Lifesaving equipment (LSE) at the water's edge	Is there appropriate means of egress from the water?	Satisfactory – the breakwater berth has access ladders which are fitted with hand grabs/rails at the top. The Victorian Pier has barriers restricting pedestrian access to one section only, access to the water is prohibited.		MJS
		Is there appropriate LSE at quay edge?	Satisfactory – life saving appliances/rings are located around the breakwater and pier edges.		MJS
SIP 005	Bollards and securing equipment	Does the general condition of bollards appear to be in good order?	Satisfactory – bollards on the breakwater berth are well maintained and painted yellow.		MJS
		Are the bollards numbered and Safe Working Load (SWL) shown?	Satisfactory – bollards on the breakwater berth have SWL as part of the casting information (typically 30 t SWL).		MJS
		Are additional bollards/rings required?	Satisfactory – ample bollards are provided on the breakwater berth. The Victorian Pier is not used for vessel operations, bollards are fitted but would require engineer evaluation before being used.		MJS

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
SIP 005	Fenders	Is the fendering appropriate to the vessel being handled?	Satisfactory – fendering on the breakwater berth is spring rubber vertical fendering which is appropriate to its use.		MJS
		Is the condition of the fendering in good order?	Satisfactory – breakwater fendering is in good condition.		MJS
		Are chaffing plates used?	Satisfactory – along the breakwater berth, wooden sacrificial beams are used to prevent line chaffing.		MJS
ACOP 232-235 SIP 005 SIP 014	Lighting	Is lighting appropriate and appear to be in compliance with ACOP 'safety in docs' and the PFSP?	Satisfactory – there is ample lighting around breakwater berth. The pedestrian areas of the Victorian Pier are lit.		MJS
ACOP 58-60	Layout	Is adequate separation delineated between quayside operations?	Satisfactory – the breakwater berth has security fence restrictions, preventing the public accessing the berth face. Pedestrian access to the ferry is via the linkspan, which is gated and opened by Pier Operatives on ferry arrival. The Victorian Pier section open to the public has barriers to prevent access to sections considered unsafe. Image B1.1 and Image B2.2 show the Victorian Pier restricted area which are considered unsafe for public access. Vessels are not permitted to berth at the Victorian Pier.		MJS
ACOP 82	Signage	Is appropriate signs and markings provided	Satisfactory – signage around the piers prohibits fishing and cycling.		MJS



Image B1.1 Victorian Pier, north view



Image B1.2 Victorian Pier, south view

B.2 Marine Operations

Marine operations at Dunoon were observed on 23 September 2021. This included the mooring procedure for the Ali Cat arrival, plus the Personal Protective Equipment (PPE) used by Pier Operatives and the procedure followed for link span operation and berthing.

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
GtGP 10.6.1 ACOP 42 SIP 005	Communication	Is there direct communication between ship and shore personnel?	Satisfactory – Pier Operatives have access to VHF radios; anecdotal information identifies that mobile phones are the usual method of communications with the ferry.		MJS
		Is there adequate communication with boats during mooring?	Satisfactory – Pier Operatives position themselves at the end of the linkspan to guide ferry berthing.		MJS
		Are hand signals used and appropriate?	Satisfactory – Pier Operatives use hand signals and guide the vessel, giving verbal instructions to ferry staff who are manning the stern passenger access point.		MJS
GtGP 11.7 SIP 005	Planning	Is the mooring pattern appropriate to the quay/vessel and weather conditions?	Satisfactory – the mooring pattern is designed, installed and maintained by CFL. The bow mooring point is fixed, the ferry deploys additional bow and stern moorings.		MJS
SIP 005	Self-mooring	Do vessels self-moor?	Satisfactory – vessels self-moor using a CFL approved mooring plan. Mooring plan sighted.		MJS
SIP 005	Line handling	Do mooring personnel avoid stepping over lines or standing between lines and quay edge?	Not applicable – not observed.		MJS
		Are multiple lines 'dipped' on bollards?	Not applicable – not observed.		MJS
		Are messenger lines thrown appropriately?	Not applicable – not observed.		MJS
		Are mooring personnel 'backed-up' on heavy lines?	Not applicable – not observed.		MJS
		Do mooring personnel release heavy lines appropriately?	Not applicable – not observed.		MJS
		Mooring personnel using appropriate handling?	Not applicable – not observed.		MJS
		Are heaving lines weighted?	Not applicable – not observed.		MJS

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
SIP 005	Use of equipment	Is the Safe Working Load (SWL) of bollards appropriate to the load being placed on?	Satisfactory – bollards are (considered to be) above the restraint capacity needed for the ferry usually assigned to the route.		MJS
		Are mooring lines used at an appropriate angle for the infrastructure?	Satisfactory – mooring lines are set at an appropriate angle, mostly horizontal.		MJS
		Are mooring lines maintained at an appropriate length throughout the operation?	Satisfactory – for the time the vessel was on-berth, mooring lines did not require adjustment.		MJS
ACOP 58-67 SIP 014	Operational control	Is there concurrent activity alongside the mooring operation?	Satisfactory – no concurrent activity. The berth is a dedicated ferry berth, occasionally visiting craft (salt ship, the Waverly, or visiting workboats) may carry out concurrent activity.		MJS
GtGP 11.4 SIP 005	Personnel and equipment	Are harbour personnel wearing appropriate PPE?	Satisfactory – Pier Operatives on the linkspan were noted to wear high visibility (hi-viz) clothing. The linkspan is barriered, with Pier Operatives working inside of the barriered area. Observation – should Pier Operatives work on the quayside or outside of the barrier area on the linkspan, the risk assessment should be reviewed to consider if additional PPE is required.	Recommend – review the risk assessment and procedure for quayside working PPE requirements.	MJS
		Is adequate manning provided for running marine operations, handling lines and operating a safe harbour.	Satisfactory – anecdotal information identifies that the harbour has sufficient staff to safely provide marine operations. Staff are arranged into three, two-person teams with a shift pattern that matches the ferry arrivals and departures timetable.		MJS
		Is any additional equipment required and is equipment in use in good working order?	Satisfactory – observation of the breakwater berth including the linkspan, main (north) berth and hammerhead berth, in the auditor's opinion was well maintained. Observation – the Victorian Pier was in a deteriorated state, and unusable for vessel berthing. See B2.1 and B2.2. Note: the Victorian pier is not open to vessel traffic, this is managed by the Harbour Master and marine team at Dunoon.	Recommend – the pier is not used for vessel berthing without remedial works.	MJS



Image B2.1 Victorian Pier, south side, steps not in use



Image B2.2 Victorian Pier, deteriorated decking

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