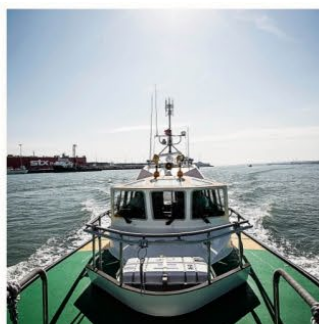
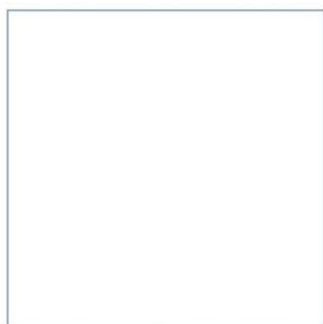
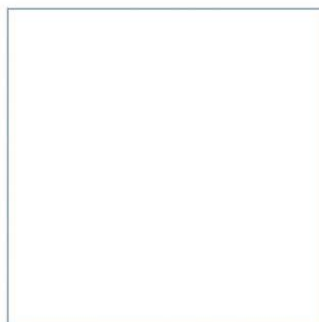


Argyll and Bute Council

Port Marine Safety Code

Audit: Isles of Mull and Iona
(Craignure, Bunessan, Fionnphort, Iona) 2022

November 2022



Innovative Thinking - Sustainable Solutions

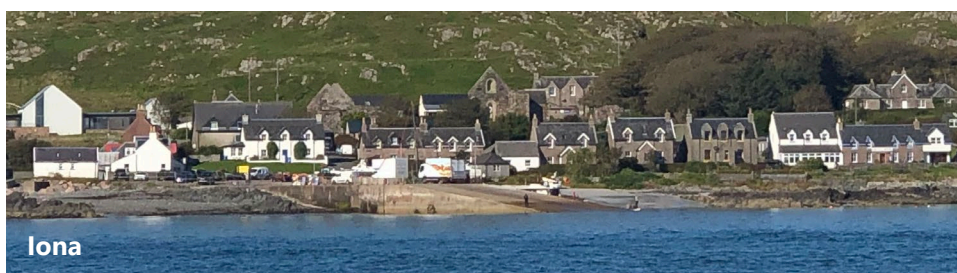
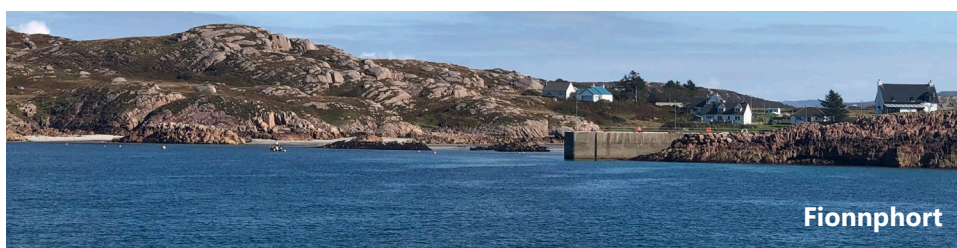
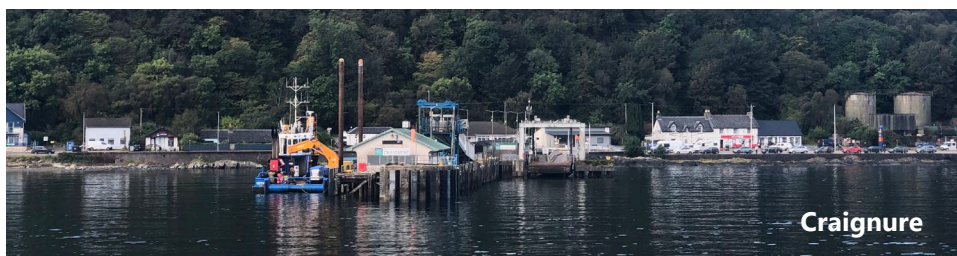
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Port Marine Safety Code

Audit: Isles of Mull and Iona

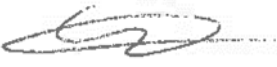


(Craignure, Bunessan, Fionnphort, Iona) 2022

November 2022



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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

The Isle of Mull is the second-largest island of the Inner Hebrides (after Skye) and lies off the west coast of Scotland in the council area of Argyll and Bute. Mull has a number of harbours, ports, piers and slipways. The Council is responsible for three, namely: Craignure, Bunessan and Fionnphort which are all operated by the Harbour Master team from Oban.

Craignure lies close to the Isle of Mull's easternmost point and is the main terminus for the ferries from Oban Bay. A&BC is the Statutory Harbour Authority (SHA) by virtue of the Argyll County Council (Arinagour and Craignure Piers, etc) Order 1961, the limits of which are set out in Part 4, Section 24(2) of the Order as shown in Figure 1. The Council is the facility owner for its marine assets and the SHA for the harbour. The original pier was built in 1894 and is located in the south east end of the bay adjacent to the village hall. The present pier is located on the west side of the bay and was built in 1964, it has two berths with the northern berth used by the ferry and the southern berth for other craft. The harbour has scheduled ferry services, with occasional calls from aquaculture and small cruise vessels. There are a number of local resident community moorings around the original pier at the south east end of Craignure Bay.

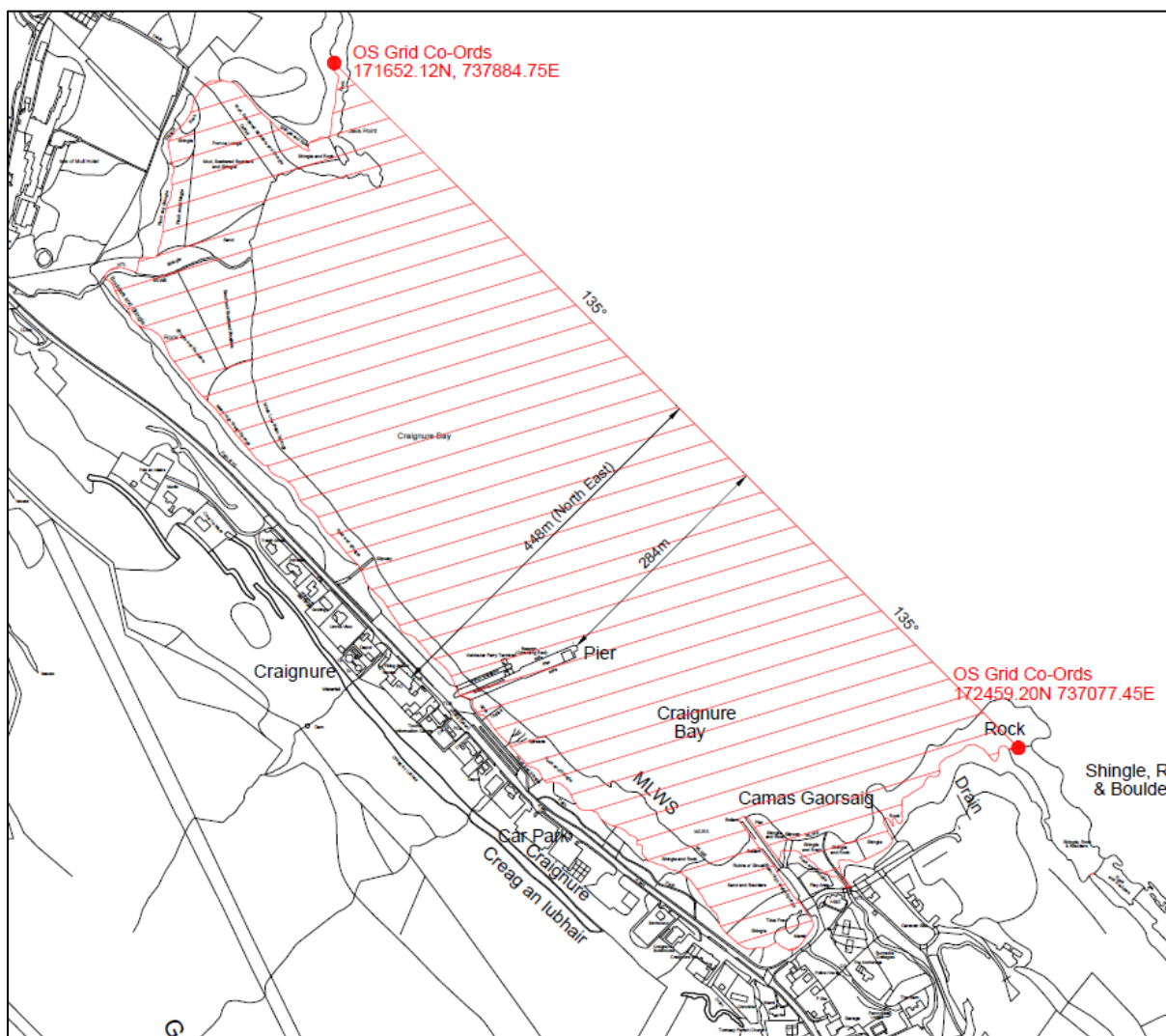


Figure 1. Craignure Harbour Limits

Bunessan pier is located on the Ross of Mull in the south west of the Isle of Mull, A&BC is the marine facility owner for the pier structure, but the area does not form part of an SHA. The pier was constructed from the local granite in *circa* 1846, prior to the building of the pier boats anchored in the bay and shuttled their cargo ashore in small boats. Current use of the pier is local fishing vessels all the year round and visiting yachts during the summer months.

Fionnphort is the Mull terminal for the Iona Ferry. The marine berthing facilities at Fionnphort are owned by A&BC but the area does not form part of an SHA. The port has a slipway providing passenger and vehicle access to the ferry, plus a pier which is used by local fishing vessels, recreational and privately-owned craft. Baile Mòr is the Isle of Iona terminal for the Iona Ferry. The port has a slipway providing passenger and vehicle access to the ferry, as well as being used by local fishing vessels, recreational and privately-owned craft. The Iona ferry route is operated by CalMac Ferries Ltd (CFL) and provides a lifeline service linking the Isle of Iona to the Isle of Mull.

Vessel traffic within the Sound of Iona can be characterised into two groups. The first is the ferry traffic which navigates between Fionnphort and Baile Mòr on the Isle of Iona (approximate east to west route, linking the Isles of Mull and the Isle of Iona). The second, is traffic transiting through the Sound (approximate north-east, south-west direction) which is comprised of fishing vessels, recreational vessels and the Staffa Tour boats which operate from Fionnphort and Baile Mòr on Iona.

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, addressing 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 onsite at Oban on 06 September 2022, with a site visit to the Isle of Mull and the Isle of Iona on the 29 September 2022. 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
Harry Aitchison	HJA	ABPmer, Maritime Consultant Internal Auditor: Quality Management Systems (QMS ISO 9001)
Monty Smedley	MJS	ABPmer, Principal Maritime Consultant Lead Auditor for Quality Management Systems (QMS ISO 9001) Designed Person (PMSC) Argyll and Bute Council
Sophie Butler	SRB	ABPmer, Maritime Analyst Internal Auditor: Quality Management Systems (QMS ISO 9001)

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
Scott Reid	SR	Marine Operations Manager
Vicki McKenzie	VM	Oban North Pier – Harbour Master

3 Audit Summary

Number	Key Measures Ten-Point 'Health Check'			
1	Duty Holder	0	2	5
2	Designated Person	0	1	2
3	Legislation	1	2	3
4	Duties and Powers	0	15	37
5	Risk Assessment	2	1	4
6	MSMS	3	5	9
7	Review and Audit	0	1	4
8	Competence	0	7	3
9	Plan	1	0	2
10	Aids to Navigation	0	0	2
	Total	7	34	71

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 Craignure and the marine facility owner for Bunessan, Fionnphort and Iona Slipway, the Council is found **not to be fully compliant** with the requirements of the Port Marine Safety Code. The following three non-compliances were recorded:

- The MSMS does not cite the Craignure 1961 Order, nor are the harbour limits shown. The MSMS must contain information on the local legislation for Craignure 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 '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.
- Bunessan, Fionnphort and Iona do not have any operational marine/navigational risk assessments. A review of marine hazards and the creation of marine/navigational risk assessments for Bunessan, Fionnphort and Iona should be conducted without delay.
- Bunessan, Fionnphort and Iona are not included in the MSMS. The Code requires that all marine facilities, as a minimum, are operated with reference to a proportional MSMS.
- The MSMS Section 4 addresses 'Consultation', with sections on consultation policy, statutory consultation and consultation with interested parties. The MSMS does not provide information on the consultation process in place for Craignure, Bunessan, Fionnphort or Iona.
- There is no method for recording incident records for Bunessan, Fionnphort and Iona. Information from the audit identifies that no incidents have been reported.

The PMSC audit identified 34 observations relating to improvement opportunities for management consideration, the detailed findings being presented in Appendix A. The following points identify the more significant items:

- The Admiralty Chart, 2389 'Loch Linnhe Southern Part' and 2390 'Sound of Mull' does not map the statutory harbour limits for Craignure
- Whilst there are system audits of the MSMS, it is not clear if Craignure, Bunessan, Fionnphort and Iona have been included in a cyclic audit of unstaffed marine facilities.
- There have been no bathymetric surveys Bunessan, which this is not a statutory harbour authority (and therefore a survey is not required under Conservancy Duty) the A&BC Hydrographic Policy commits to undertaking such hydrographic surveys as are necessary for safe and efficient navigation and to provide port users with up-to-date and accurate hydrographic information. As such, the absence of survey information for Bunessan is considered to be a **non-conformity** with A&BC's hydrographic policy.
- At the time of audit there was no evidence of an appointment letter for the statutory role of Harbour Master or Deputy Harbour Master for Craignure.
- Fionnphort does not have any information on the A&BC 'Piers and Harbours' website.
- The MSMS Annex on Craignure does not provide information on how powers of Special Direction are used for controlling vessel movements.
- 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.

Quayside checks were also carried out all four facilities, a number of observations were recorded as shown in Appendix B. The following identify key findings:

- At Craignure, some of the water egress (safety) ladders do not continue below the waterline. It is a requirement that ladders extend to at least 1 m below the water surface at low water.
- At Bunessan, housekeeping was noted to be poor with disused ropes hanging off the pier and a substantial amount of stored and/or abandoned fishing equipment. This equipment obstructed access to safety equipment and water egress ladders.
- At Bunessan, one life ring was noted to be in a deteriorated state of repair.
- At Fionnphort, gated access to the pier was tied shut, with ferry employees witnessed jumping around the gate rather than going through it. Operational areas should be gates to prevent public access; however, gates should be accessible to pier operatives/ferry staff.
- At the Isle of Iona slipway, a significant amount of concrete obstructed access for small vessels using the slipway at certain states of tide. This presents a navigational hazard and creates a risk of vessel grounding or contact which may result in hull damage.

The following points of best practice were noted:

- Provision and maintenance of Aids to Navigation is recognised as an area of best practice with a 100% availability for Category 3 and 99.8% for Category 2 Aids.
- At the time of audit, all seven 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.

4 References

DfT, 2016. Port Marine Safety Code, Department for Transport (DfT), 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, 2022. Navigation: Vessel Traffic Services (VTS) and Local Port Services (LPS) in the United Kingdom. Marine Guidance Note: MGN 401 (M+F) Amendment 3. Maritime & Coastguard Agency, March 2022.

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://www.argyll-bute.gov.uk/fees/22/piers>

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

<https://www.argyll-bute.gov.uk/mid-argyll-kintyre-and-islay/craignure-pier>

<https://www.argyll-bute.gov.uk/moderngov/ieListMeetings.aspx?CId=567&Year=0>

https://www.argyll-bute.gov.uk/sites/default/files/dp_contact_information_abc.pdf

<https://www.gov.uk/government/publications/port-marine-safety-code-compliant-ports/port-marine-safety-code-compliant-ports-list>

5 Abbreviations/Acronyms

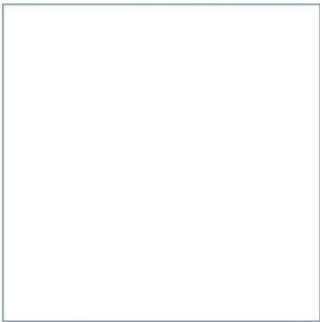
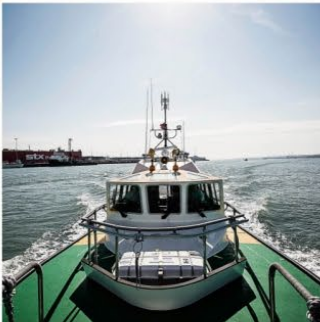
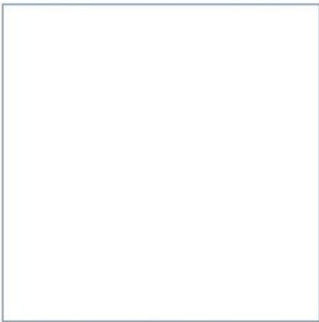
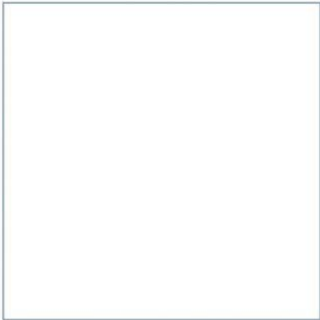
A&BC	Argyll and Bute Council
ACOP	Approved Code of Practice and Guidance
ALRS	Admiralty List of Radio Signals
AtoN	Aid(s) to Navigation
BPA	British Ports Association
CARP	Critical Activity Recover Plan
CAT	Category
CERS	Consolidated European Reporting System
CFL	CalMac Ferries Limited
CHA	Competent Harbour 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 1847
HQ	Head Quarters
HR	Human Resources
HRO	Harbour Revision Order
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
MS	Microsoft
MSMS	Marine Safety Management System
n/a	Not Applicable
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
PSS	Port Skills and Safety
QMS	Quality Management System
RATSA	Railways and Transportation Safety Act
RNLI	Royal National Lifeboat Institute
RYA	Royal Yachting Association
SAC	Special Areas of Conservation
SEPA	Scottish Environment Protection Agency

SHA	Statutory Harbour Authority
SIP	Safety in Port
SOPs	Standard Operating Procedures
SOSREP	Secretary of State's Representative
SPA	Special Protection Areas
SWL	Safe Working Load
UK	United Kingdom
UKHO	United Kingdom Hydrographic Office
VTS	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?	Satisfactory – one of the locations audited has a harbour Act: <ul style="list-style-type: none"> ▪ Craignure is a Statutory Harbour Authority (SHA), the harbour authority has a copy of its local legislation in the form of the 'Argyll County Council (Arinagour and Craignure Piers, etc) Order 1961'. ▪ Bunessan, Fionnphort and Iona Slip are marine facilities and outwith an SHA boundary, there is no (known) extant local harbour legislation. 		MJS_005	MJS
		Is the Harbour, Docks and Piers Clauses Act (HDPCA) 1847 incorporated into local Acts and Orders?	Satisfactory – the HDPCA has been incorporated, as referenced in the Section 2(1) and Section 3(3) of the 1961 Act.		MJS_005	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

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
1.8	The Duty Holder	Are the Duty Holder's responsibilities for compliance with Code defined?	<p>Satisfactory – the MSMS, Section 2.2 lists the duties of the Duty Holder.</p> <p>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).</p>	<p>Recommend – 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.</p>	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?	<p>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 Oban visit was on 24 September 2021. The Harbour Board were also invited to the Campbeltown Emergency Response Exercise in November 2021. The MSMS is provided on the Council's website making it a simple process to view the most recent version.</p>		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?	<p>Satisfactory – all the current (seven) Councillors of the Harbour Board, plus the Council's Executive Director of Development and Infrastructure Services (as Duty Holder) have attended training run on 05 September 2022. 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. It should be noted that at the time of audit, a bye-election was planned and following its completion the Harbour Board will increase to eight.</p>		MJS_002 MJS_006	MJS
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 Oban staff notice board.</p>		https://www.argyll-bute.gov.uk/site/default/files/dp_contact_information_abc.pdf	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 1.11-1.12	Cont. The Designated Person	Is the Designated Person's role explained in the MSMS?	Satisfactory – the MSMS, Section 2.5 lists the duties of the Designated Person. Observation – the appointment information in Section 2.5 of the MSMS is not accurate.	Recommendation – the Designated Person's details in the MSMS are updated.	MJS_001	MJS
1.13	Chief Executive [or equivalent]]	Have executive and operational responsibilities for marine safety been clearly assigned?	Satisfactory – the MSMS, Section 2.2 lists the responsibilities of the Duty Holder, who is also the Chief Executive. 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.	Recommendation – the role profile in the MSMS is reviewed and wording around 'adequate resources' is included.	MJS_001	MJS
		How is marine safety funded within the organisation?	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.		n/a	MJS
1.9, 1.14 – 1.15	Harbour Master	Have executive and operational responsibilities for marine safety been clearly assigned?	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.		MJS_001	MJS
		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 01 September 2022 identifies reports including the Marine Asset Management Plan Update, Port Marine Safety Code Update, Oban Bay Update and Draft Harbour Board Workplan.		MJS_006 MJS_007 https://www.argyll-bute.gov.uk/moderngov/ieListMeetings.aspx?CategoryId=567&Year=0	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
1.16 – 1.17	The Organisation's Officers	Does the MSMS provide details of the organisation's Officers and their responsibilities for marine safety?	<p>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.</p> <p>Observation – the role of the Technical Officer(s) for Piers and Harbours could be usefully included within the MSMS.</p>	<p>Recommendation – include the role of the Technical Officer(s) for Piers and Harbours.</p>	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 	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. Information from the MAIB and the BPA in the former of safety circulars are distributed by the Marine Operations Admin Officer. Evidence sighted.		MJS_009 MJS_010	MJS
2.3 – 2.6	Review existing powers	Does the Harbour Authority have an understanding of local legislation?	Satisfactory – the Harbour Authority has a copy of the Craignure 1961 Order, plus a map with the extent of the harbour limits shown.		MJS_003 MJS_005	MJS
		Are local Acts and Harbour Orders referenced in MSMS?	Non-compliance – the MSMS does not cite the Craignure 1961 Order, nor are the harbour limits shown.	Recommendation – the MSMS must contain information on the local legislation for Craignure and expand upon the powers, duties and responsibilities provided by the local Acts and Orders.	MJS_001	MJS
		Have the Harbour Authority's existing powers been reviewed?	Satisfactory – the harbour acts have been reviewed by A&BC lawyers with an external review conducted by marine lawyers. Recommendations a consolidated Harbour Act (covering all Argyll and Bute ports, harbours and marine facilities (excluding Oban)) has been commenced.		MJS_047	MJS
		Is the organisation's jurisdiction mapped and clear?	Satisfactory – the 'Argyll County Council (Arinagour and Craignure Piers, etc) Order 1961', Part 4, Section 24(2) sets out the harbour limits. This area is mapped by the Council. Observation – the Admiralty Chart, 2389 'Loch Linnhe Southern Part' and 2390 'Sound of Mull' does not map the port limits. Observation – the MSMS, does not include information on the Craignure SHA boundary.	Recommendation – providing the boundaries to the UK Hydrographic Office including descriptions from the 1961 Act, Part 4, Section 24(2) requesting update of the harbour limits. Recommendation – the description for A&BC's SHA area at Craignure is included in the MSMS to match the areas described in the 1961 Act, Part 4, Section 24(2).	MJS_003 MJS_005	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
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?	<p>Satisfactory – the MSMS, Section 8 describes the assessment methodology. A set of 11 risk assessments are in place for Craignure harbour, all assessments were in-date at the time of audit. Review dates were completed on 13 September 2022. The hazard scenarios cover a range of foreseeable eventualities based on current harbour activities.</p> <p>Non-compliance – Bunessan, Fionnphort and Iona do not have any operational marine/navigational risk assessments.</p>	<p>Non-compliance – a review of marine hazards and the creation of marine/navigational risk assessments for Bunessan, Fionnphort and Iona.</p>	MJS_001 MJS_004 MJS_011 MJS_012	MJS
		How does the organisation ensure those undertaking marine risk assessment are competent?	<p>Satisfactory – the Harbour Master has undertaken a training course for marine risk completed on 02 March 2021. Certificate sighted.</p>		MJS_013	MJS
		Are stakeholders included in marine risk review/assessments?	<p>Satisfactory – risk assessment reviews are conducted with the Assistant Harbour Master. The risk assessment sample identifies that the Royal Yachting Association (RYA), the Royal National Lifeboat Institute (RNLI) and the Clyde Cruising Club were consulted on selected risk assessments for Craignure.</p>		MJS_004 MJS_012	MJS
			<p>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,</p>	<p>Recommendation – the Harbour Authority requirement 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.</p>	MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont.	Cont.	Cont.	Cont.		MJS_001	MJS
2.7 – 2.11	Use of Formal Risk Assessment (FRA)	Does the MSMS prescribe the review frequency for risk assessments?	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.			
		Is a system of Dynamic Risk Assessment (DRA) used?	Satisfactory – a DRA flow diagram has been prepared and distributed to harbour staff at Oban, a copy was posted on the notice board. Observation – 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_048	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 which includes Craignure. Observation – the MSMS 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. Non-compliance – Bunessan, Fionnphort and Iona are not included in the MSMS. The Code requires that all marine facilities, as a minimum, are operated with reference to a proportional MSMS.	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. Recommendation – marine activities relevant to Bunessan, Fionnphort and Iona are documented in the MSMS.	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?	Satisfactory – A&BC's key performance indicators for ports and harbours are identified in the 'Marine Safety Plan' as specific outcomes. Observation – the MSMS does not address port and harbour KPIs.	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'.	MJS_001 MJS_002	MJS
2.16	MSMS assigning responsibility	Does the MSMS explicitly assign responsibility for appropriate safety/conservancy matters?	Satisfactory – the MSMS, Section 2 'Key Personnel and Responsibilities' assigns responsibility for safety and conservancy to key post holders in the Harbour Authority.		MJS_001	MJS
2.17	MSMS Consultation	Are forum/consultation meetings held?	Non-compliance – the MSMS Section 4 addresses 'Consultation', with sections on consultation policy, statutory consultation and consultation with interested parties. The MSMS does not provide information on the consultation process in place for Craignure, Bunessan, Fionnphort or Iona.	Recommendation – organise and run regular user consultation meetings, record meeting minutes and outcomes.	n/a	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
2.18	Competence standards	Are personnel qualified and trained for their marine safety role?	<p>Satisfactory – Craignure, Bunessan, Fionnphort and Iona have no onsite A&BC staff. The harbour master team from Oban provides this function. With respect to evidence of competency standards for these staff, two MS Excel files are maintained, the first is titled ‘Harbour Training Matrix 2021’ the second is titled ‘training records’. The training matrix identifies the Essential, Required, Advantageous and Not Required training. The training records identifies staff by location with dates against qualifications held.</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. The training record files does hold a ‘HQ and Others’ worksheet.</p> <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.</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 – that all roles are identified in the matrix to ensure it documents all job roles with a remit for delivering marine safety functions for the Harbour Authority.</p> <p>Recommendation – provide definitions for the terms used on the matrix for the avoidance of doubt.</p> <p>Recommendation – considering if names are required against roles in the matrix.</p> <p>Recommendation – review the wording and process in the MSMS Section 6.3 to ensure it operates as required.</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	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
		Is there a list of the organisation's staff, training received, qualifications held and/or experience required for their role?	<p>Satisfactory – the Marine Operations Admin Officer maintains a central record of training. Individual staff are identified with dates of training and certification held in day/month/year format. Harbour Master keeps a local record of all staff training.</p> <p>Observation – where training has been undertaken by the Council, the Marine Operations Admin Officer maintains course certification. Where qualifications were already held by the individual or completed locally, the Harbour Master holds the certification.</p> <p>Observation – the training records do not clearly lay out the date taken and expiry date for qualifications</p>	<p>Recommendation – that the Council considers carrying out an audit of certification required to be held by staff and updates its central records accordingly.</p> <p>Recommendation – adding date taken and expiry date (named columns) to training records.</p>	MJS_001 MJS_014 MJS_015	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. There are no incidents recorded for Craignure (noting that the database commences in 2017). Records evidenced.</p> <p>Non-compliance – there is no structured method for recording incident records for Bunessan, Fionnphort and Iona. Information from audit identifies that no incidents have been reported.</p>	<p>Recommendation – a method of recording incidents, investigations and outcomes should be put in place for Bunessan, Fionnphort and Iona.</p>	MJS_016 MJS_017	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.		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), the MSMS, Section 3.7.1 identifies MCA reporting requirements.		MJS_001	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'. There have been no MAIB reportable incidents within A&BC's SHA since MarNIS records commenced in 2017.		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. The last internal audit was carried out at Oban in August 2022. Observation – whilst there are system audits of the MSMS, it is not clear if Craignure, Bunessan, Fionnphort and Iona have been included in a cyclic audit of unstaffed marine facilities.	Recommendation – the development of an internal audit schedule that includes unstaffed marine facilities.	MJS_019 MJS_020 MJS_021 MJS_022	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 are no specific processes in place for Craignure with respect to enforcement or prosecution. This links to topics of duties and powers, local legislation and byelaws.	Recommendation – the development of Craignure specific information and/or processes for enforcement and prosecution.	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.	Recommendation – the policy is separated from the body of the MSMS manual and presented as part of a policy pack.	MJS_001	MJS

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.		n/a	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 on 10/03/21 to confirm its current state of compliance with the Code. Letter evidenced. The DfT list of ports reporting compliance does not include A&BC ports, harbours or marine facilities. This position has been taken by the DfT, guidance by the MCA, as the Council has confirmed it is not compliant at the time of writing the letter but was working towards full compliance in a number of key areas, including: legislation review and update, policy review, MSMS documentation and creation of Standard Operating Procedures (SOPs).		MJS_023 https://www.gov.uk/government/publications/port-marine-safety-code-compliant-ports/port-marine-safety-code-compliant-ports-list	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 within the Craignure SHA area operating marine facilities.		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?	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.		MJS_001	MJS
3.5	Open port duty	Is the port or harbour subject to Open Port Duty’?	Satisfactory – Craignure operates on the premise that an Open Port Duty under Section 33 of the ‘Harbours, Docks and Piers Clauses Act 1847’ is in place. Bunessan, Fionnphort and Iona are not subject to Open Port Duty.		MJS_001 MJS_005	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 at Craignure was conducted on 02 November 2021, the 30 May 2017 at Fionnphort, and 09 November 2020 at Iona. Information was passed by the survey contractor to UKHO.</p> <p>Observation – there have been no bathymetric surveys of Bunessan. The MSMS, in Section 10 ‘conservancy’ and Section 10.3 ‘Hydrographic Policy’ commit to undertaking such hydrographic surveys as are necessary for safe and efficient navigation and to provide port users with up-to-date and accurate hydrographic information. As such, the absence of survey information for Bunessan is considered to be a non-conformity with A&BC’s hydrographic policy.</p>	<p>Recommendation – the policy on hydrographic survey is applied and bathymetric surveys conducted at Bunessan with the information shared with marine facility users.</p>	MJS_001 MJS_016 MJS_017 MJS_024	MJS
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_025 MJS_026	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
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 Craignure 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 Craignure 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
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
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_046	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
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 for A&BC in Campbeltown on 23 November 2021, as operation 'Smerby'. Evidence provided. In addition, locally, the Harbour Master has kit musters and drills prior to each season with seasonal staff. 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 at Craignure would be beneficial to schedule.	Recommendation – the production of a yearly planner to detail emergency exercises.	MJS_031 MJS_032	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 HRO was made in 1961. The need for a revision to bring all ports, harbour, piers and marine facilities into a common and modern format has been commenced.		MJS_047	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 – the MSMS identifies the Harbour Master's role by name.</p> <p>Observation – at the time of audit there was no evidence of an appointment letter for the statutory role of Harbour Master or Deputy Harbour Master for Craignure.</p>	<p>Recommendation – consider issuing a letter of appointment for statutory roles, separate to normal Human Resource (HR) letters.</p>	MJS_001	MJS
4.3 – 4.5	Byelaws	Does the organisation have powers to make Byelaws, are these published?	<p>Not applicable – evidence does not support the powers to make Byelaws at Craignure. These powers are not identified in the 1961 Order. Buessan, Fionnphort and Iona are marine facilities and not subject to powers available to a harbour authority.</p>		MJS_005	MJS
		Date of last byelaw review?	<p>Not applicable – no Byelaws are known to be issued.</p>		n/a	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: "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".</p> <p>Observation – the MSMS Annex on Craignure does not provide information on how powers of Special Direction are used for controlling vessel movements.</p>	<p>Recommendation – the MSMS Annex on Craignure should be expanded to include a procedure for issuing Special Directions.</p>	MJS_001	MJS
4.8	General Directions	Are the powers of General Directions available to the Harbour?	<p>Not applicable – evidence does not support powers of General Direction at Craignure. These powers are not identified in the 1961 Order. Buessan, Fionnphort and Iona are marine facilities and not subject to powers available to a harbour authority.</p>		MJS_005	MJS
		When were General Directions last reviewed?	<p>Not applicable – powers of General Direction are not available.</p>		n/a	MJS
4.9	Harbour Directions	Are Harbour Directions used and published?	<p>Not applicable – Harbour Directions have not been applied for.</p>		n/a	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
4.10 GtGP 6.4	Dangerous Vessels	Does the MSMS (or other plan) make provision for giving directions to dangerous vessels?	<p>Satisfactory – the Harbour Master has powers at Craignure (but not Bunessan, Fionnphort or Iona) under the Dangerous Vessels Act 1985. This is laid out in the MSMS, Section 10.4.4.</p> <p>Observation – information relating to the expected action for the Harbour Master in respect of a dangerous vessel should be laid out as a procedure.</p>	<p>Recommendation – the creation of a Standard Operating Procedure based around actions a Pier or Harbour Master should take in respect of a dangerous vessel.</p>	MJS_001	MJS
		Is the role of the SOSREP acknowledged?	<p>Satisfactory – the ‘Secretary of State’ overruling the Harbour Master’s direction is acknowledged in the MSMS, Section 5.1.3.4</p> <p>Observation – the term SOSREP is not included in the MSMS.</p>	<p>Recommendation – the term SOSREP should be included with an explanation of the role and how this operates in the UK.</p>	MJS_001	MJS
GtGP 6.2	Dangerous Substances	Are there clear requirements for declaration of dangerous goods/substances?	<p>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.</p> <p>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 (DG HAR)’.</p>	<p>Recommendation – updating the MSMS to the latest regulation and acronym.</p>	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?	<p>Satisfactory – vessel traffic self-manages within Craignure with the regular ferry service following its passage plan o, and from the pier. As marine facilities, Bunessan, Fionnphort and Iona do not have harbour jurisdictions requiring vessel traffic management.</p>		Observational	MJS
		Is vessel traffic monitoring information passed to the MCA by the quickest means?	<p>Satisfactory – the Council has a CERS login, however there is no evidence of CERS reporting given the traffic type using Craignure, Bunessan, Fionnphort and Iona.</p>		n/a	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. GtGP 8.4	Cont. Vessel Traffic Management	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, 2022).		Observational	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. The Council also has a Drink and Drugs Policy for its own staff.		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 – A&BC’s harbour operation at Craignure does not handle vessels of sufficient size to require a Pilotage Service. None of the risk assessments for the harbour identify the need for a Pilotage Service.		MJS_011 MJS_012	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
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

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
GtGP 8.7.15 – 8.8.10	Port Passage Plan	Is there a published passage plan?	Satisfactory – information for Craignure is included in the Admiralty List of Radio Signals (ALRS), Volume 6.		ALRS, Volume 6	MJS
GtGP 8.10	Recreational navigation	Are recreational users of the harbour considered?	Satisfactory – information is published on A&BC website providing contact information and harbour specifics. Iona slipway information links to the CalMac webpage. Bunessan is listed, with limited information shown. Observation – Fionnphort does not have any information on the A&BC 'Piers and Harbours' website.	Recommendation – consider making an entry for Fionnphort on the A&BC 'Piers and Harbours' website.	https://www.argyll-bute.gov.uk/mid-argyll-kintyre-and-islay/craignure-pier	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/fees/22/piers	MJS
4.21-4.23	Aids to Navigation	Are defects and rectification of defects recorded?	Satisfactory – as the Local Lighthouse Authority (LLA) the following Aids to Navigation are maintained at Craignure. ▪ 2x CAT 2: Fixed Red Lights (vertical) leading lights (240° True).		MJS_001	MJS
4.24	GLA returns	Are returns made to the GLA?	Satisfactory – the LATON three-year return for A&BC identifies the availability return values for the period April 2019 to April 2022 as: ▪ Cat 2 = 99.84% (target is 99%) ▪ Cat 3 = 100% (target is 97%) Provision and maintenance of Aids to Navigation is recognised as an area of best practice .		MJS_044	MJS
4.25-4.32	Wrecks, Abandoned or unserviceable vessels	Does the MSMS refer to powers for dealing with wrecks?	Satisfactory – the MSMS addresses wrecks within the Conservancy section. Removal of wreck from Craignure Bay (Oct/Nov 2022) evidenced. Observation – the MSMS does not contain specific information on dealing with wrecks, derelict or abandoned vessels.	Recommendation – the topic of wrecks, derelict and abandoned vessels is covered by a Harbour Authority procedure.	MJS_001 MJS_029	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
GtGP 9.4.17 -9.4.21	Pilot Launches	Do pilot boats meet statutory requirements and appropriate Codes?	Not applicable – the Organisation is not a Competent Harbour Authority and therefore has no requirement to operate a pilot boat.		n/a	MJS
GtGP - 10	Towage Operations	Does the organisation produce towage guidelines?	Satisfactory – the MSMS, Section 13.1.1.6 addresses towage. Observation – the section on towage addresses Campbeltown only. There is no comment on towage (either routine or non-routine) at other A&BC ports, harbours or piers.	Recommendation – drafting of appropriate towage guidelines for all A&BC ports, harbours or piers.	MJS_001	MJS
		Is there a process for approving towage providers?	Not applicable – there are no towage providers in Craignure Harbour.		n/a	MJS
		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 17 June 2021 for Iona and 24 May 2022 for Craignure were evidenced.		MJS_001 MJS_034 MJS_035	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: "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". There is no history of using the 'Hot Work Permit' at Craignure, Bunessan, Fionnphort or Iona.		MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
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 only bunkering activity undertaken is at Craignure where CalMac vessels are bunkered by tanker on the vessel (using the vessel's own check list and procedures).		MJS_001	MJS
GtGP – 11.3, 11.4	Regulation of Port Craft, Pilot Launches and Workboats	Does the Authority have a procedure for regulating port craft?	Satisfactory – the MSMS, Section 13.1.1.5 has a detailed section on the expectations for Boat Licensing. Observation – there is currently no method of obtaining assurance that craft working commercial (i.e., not Council contracted activities) are operating their vessels in accordance with relevant MCA codes.	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.	MJS_001	MJS

B Quayside Checks

Visual observation of the harbour and marine facilities at Craignure, Buessan, Fionnphort and Iona were undertaken on Thursday 29 September 2022.

B.1 Craignure

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 Craignure Pier was free from debris and trip hazards. There was good signage for the jetty.		HJA/SRB
		Pedestrian/Disabled access for passengers or leisure users?	Satisfactory – pedestrian walkways were clearly marked.		HJA/SRB
		Is the type and condition of quayside surface appropriate to the operation?	Satisfactory – the pier was in generally good condition and surface is appropriate to its intended use.		HJA/SRB
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 – access and egress ladders were installed at appropriate distances along the pier.		HJA/SRB
		Is there appropriate LSE at quay edge?	Satisfactory – adequate lifesaving equipment (life rings) were installed along the pier. Observation – some of the ladders do not continue below the waterline. See Image B1. Observation – some ladders located at the pier end were missing handrails and/or grab loops at deck/cope level. See Image B2.	Recommendation – ladders should be replaced with ones that extend to at least 1 m below the low water mark. Recommendation – ladders with missing handrails or grab loops should have these fitted to assist ladder users reach the pier deck.	HJA/SRB
SIP 005	Bollards and securing equipment	Does the general condition of bollards appear to be in good order?	Satisfactory – in the opinion of the auditor, the mooring bollards appeared to be well maintained and painted yellow. All mooring equipment observed to be in good condition.		HJA/SRB
		Are the bollards numbered and Safe Working Load (SWL) shown?	Satisfactory – the bollards were all marked with SWL. Observation – there was no (obvious) numbering of the mooring bollards.	Recommendation – bollards should be numbered for ease of identification.	HJA/SRB
		Are additional bollards/rings required?	Satisfactory – in the opinion of the auditor, ample mooring bollards on the pier are provided.		HJA/SRB

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 pier is fixed and observed to be in good condition. Fendering was suitable for the vessels being used.		HJA/SRB
		Is the condition of the fendering in good order?	Satisfactory – pier fendering observed to be in good condition.		HJA/SRB
		Are chaffing plates used?	Satisfactory – chaffing plates and/or wood sections were in use along the pier edge.		HJA/SRB
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 – lighting units were installed around the pier and were considered sufficient for operations (note, the onsite checks were carried out in daylight, lighting at night was not seen).		HJA/SRB
ACOP 58-60	Layout	Is adequate separation delineated between quayside operations?	Satisfactory – the ferry passengers follow a marked footpath, separate from pier operations.		HJA/SRB
ACOP 82	Signage	Is appropriate signs and markings provided	Satisfactory – signage was evident throughout the pier and entrance to the pier.		HJA/SRB



Image B1. Craignure, ladder does not extend below waterline



Image B2. Craignure, ladder with missing handrails or grab loops

B.2 Bunessan

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?	Observation – housekeeping was considered to be poor. There were disused ropes hanging off the pier and there was a substantial amount of stored and/or abandoned fishing equipment, ropes, pots and other fishing items along the pier. See Image B3.	Recommendation – users of the pier and harbour staff should remove unused items, dispose of old fishing gear in a responsible manner and provide housekeeping to ensure the pier can be used free of trip hazards. Any ropes or unwanted fishing gear can become an entrapment hazard for wildlife, pier users and contribute to ghost fishing ¹ .	HJA/SRB
			Observation – obsolete (rusting) metal lifting equipment fixed to the pier presented a trip hazard. See Image B4.	Recommendation – lifting equipment should be removed if no longer in use.	
		Pedestrian/Disabled access for passengers or leisure users?	Satisfactory – the pier had no clearly marked walkways, but it was considered not required as the pier is not used routinely by members of the public.		
		Is the type and condition of quayside surface appropriate to the operation?	Satisfactory – the pier had clear access approaching it, the road surface was in reasonable condition but did have isolated potholes.		HJA/SRB
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 pier had adequate numbers of ladders and stairs from the pier.		HJA/SRB
			Observation – steps were not accessible due to ropes and other debris impeding access on the pier. See Image B3.	Recommendation – clear pier of debris to allow access to and from ladders and stairs.	
			Observation – the handrail located along the pier edge was very loose.	Recommendation – the handrail should be re-secured firmly to the pier edge.	
			Observation – ropes and tires were tied to ladders impeding use. See Image B5 .	Recommendation – clear all ropes and obstructions from ladders.	
		Is there appropriate LSE at quay edge?	Satisfactory – the pier had adequate numbers of life rings fitted to the handrails.		HJA/SRB
			Observation – one life ring was found to be in a deteriorated state. See Image B6.	Recommendation – inspection and renewal of the life ring and the commencement of a regular inspection regime.	

¹ Discarded, lost, or abandoned, fishing gear in the marine environment which contributes to boat damage and death of wildlife through entrapment.

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
SIP 005	Bollards and securing equipment	Does the general condition of bollards appear to be in good order?	Satisfactory – in the opinion of the auditor the bollards and rings appeared to be appropriate to the size of vessels using the pier and in an adequate state of repair. Observation – the bollards and rings may present a trip hazard.	Recommendation – that bollards and mooring rings, or area around the mooring rings at the pier are painted in a bright colour to aid their identification.	HJA/SRB
		Are the bollards numbered and Safe Working Load (SWL) shown?	Observation – there was no (obvious) SWL for bollards. Observation – there was no (obvious) numbering of the mooring bollards.	Recommendation – bollards should be marked with their SWL. Recommendation – bollards should be numbered for ease of identification.	HJA/SRB
		Are additional bollards/rings required?	Satisfactory – in the opinion of the auditor, ample bollards and rings are installed along the pier which are considered to be appropriate for the size of vessel being handled.		HJA/SRB
SIP 005	Fenders	Is the fendering appropriate to the vessel being handled?	Observation – fendering on the pier edge was observed to be deteriorated and potentially in need of replacement. See Image B7.	Recommendation – review pier edge wooden protection to consider if replacement is required.	HJA/SRB
		Is the condition of the fendering in good order?	Observation – fendering on the pier was considered to be inadequate, vessel owners had provided temporary and makeshift protection.	Recommendation – review the fendering arrangements and consider fitting protective measures, for example, fixed rubber sections.	HJA/SRB
		Are chaffing plates used?	Not Applicable – no chaffing plates seen.		HJA/SRB
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 – light units were installed around the pier and were considered sufficient for operations (note, the onsite checks were carried out in daylight, lighting at night was not seen).		HJA/SRB
ACOP 58-60	Layout	Is adequate separation delineated between quayside operations?	Satisfactory – the quayside is thought to be used infrequently and by pedestrians only.		HJA/SRB
ACOP 82	Signage	Is appropriate signs and markings provided	Satisfactory – signage was evident along the pier and at the root of the pier.		HJA/SRB



Image B3. Bunessan, trip hazards and obstruction to steps.

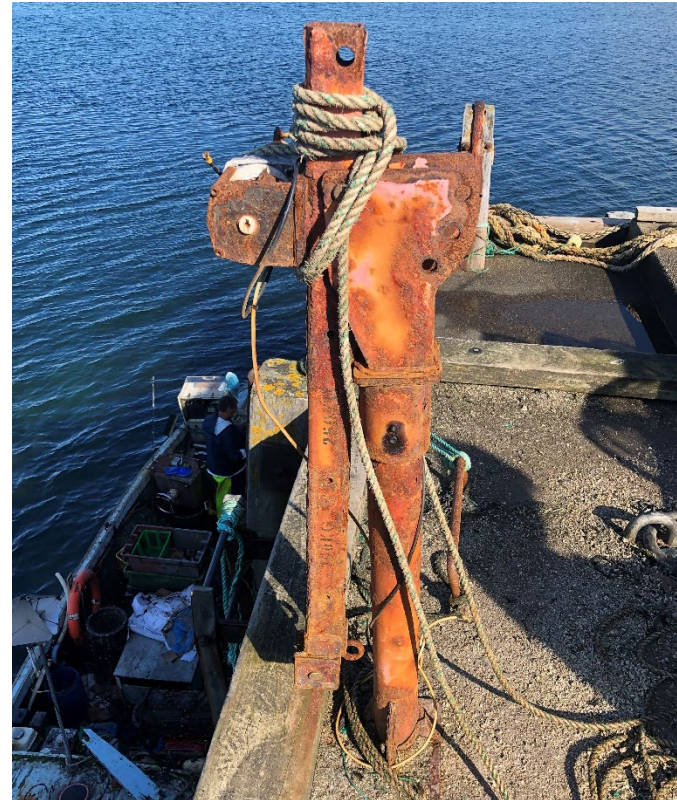


Image B4. Bunessan, obsolete lifting equipment (trip hazard)



Image B5. Bunessan, tires and ropes affixed to ladders



Image B6. Bunessan, life ring



Image B7. Bunessan, wooden fendering in disrepair

B.3 Fionnphort

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?	<p>Satisfactory – the pier and slipway were generally clear of debris and all fishing pots were neatly stacked to the side.</p> <p>Observation – fishing pots were neatly stacked blocking access to the pier presenting a trip hazard. See Image B8.</p> <p>Observation – the gate to the pier was tied shut, and CalMac ferry employees were witnessed jumping around the gate rather than going through it.</p> <p>Observation – there were a couple of raised metal eyelets that presented trip hazards and were not marked with a bright and notable colour.</p>	<p>Recommendation – pier should be easily accessible and fishing pots should be moved.</p> <p>Recommendation – gate should be locked to prevent public access; however gates should be accessible to pier operatives/ferry staff to allow them access to the restricted area.</p> <p>Recommendation – eyelets are either painted or removed if no longer useful.</p>	HJA/SRB	
		Pedestrian/Disabled access for passengers or leisure users?	Satisfactory – walkways were clearly marked for pedestrians and cars accessing the ferry via the slipway.			HJA/SRB
		Is the type and condition of quayside surface appropriate to the operation?	Satisfactory – the pier and slipway were generally in good condition and free of marine growth. There were a few small potholes.			HJA/SRB
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 – there were an adequate number of access and egress ladders installed.		HJA/SRB	
		Is there appropriate LSE at quay edge?	<p>Satisfactory – Life saving equipment (life rings) were installed at the appropriate distances along the pier.</p> <p>Observation – one life ring was missing its cover. See Image B9</p>	Recommendation – life ring cover should be replaced.	HJA/SRB	
SIP 005	Bollards and securing equipment	Does the general condition of bollards appear to be in good order?	<p>Satisfactory – in the opinion of the auditor the bollards and rings appeared in good condition.</p> <p>Observation – the bollards and rings may present a trip hazard and were not marked with a bright and notable colour.</p>	Recommendation – bollards on the pier and mooring rings, or area around the mooring rings on the slipway are painted in a bright colour to aid their identification.	HJA/SRB	

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
Cont. SIP 005	Cont. Bollards and securing equipment	Are the bollards numbered and Safe Working Load (SWL) shown?	Observation – there was no (obvious) SWL for bollards. Observation – there was no (obvious) numbering of the mooring bollards.	Recommendation – bollards should be marked with their SWL. Recommendation – bollards should be numbered for ease of identification.	HJA/SRB
		Are additional bollards/rings required?	Satisfactory – in the opinion of the auditor, ample bollards and rings are installed along the pier and slipway which are considered to be appropriate for the size of vessel being handled.		
SIP 005	Fenders	Is the fendering appropriate to the vessel being handled?	Satisfactory – pier fendering is fixed and observed to be in good condition.		HJA/SRB
		Is the condition of the fendering in good order?	Satisfactory – all fitted fendering was observed to be in good condition.		HJA/SRB
		Are chaffing plates used?	Not Applicable – no chaffing plates seen.		HJA/SRB
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 – light units were installed around the pier and were considered sufficient for operations (note, the onsite checks were carried out in daylight, lighting at night was not seen).		HJA/SRB
ACOP 58-60	Layout	Is adequate separation delineated between quayside operations?	Satisfactory – walkways were clearly marked for pedestrians and cars accessing the ferry via the slipway.		HJA/SRB
ACOP 82	Signage	Is appropriate signs and markings provided	Satisfactory – signage was evident at the throughout pier and slipway.		HJA/SRB



Image B8. Fionnphort, access to pier blocked by fishing pots



Image B9. Fionnphort, life ring missing cover

B.4 Iona

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 – both slipways had good access and were clear of debris. Observation – a significant amount of concrete obstructed access for small vessels using the slipway at certain states of tide. This presents a navigational hazard and creates a risk of grounding or contact which may result in vessel hull damage.	Recommendation – concrete obstructions are removed from the seabed to allow increased access by vessels.	HJA/SRB
		Pedestrian/Disabled access for passengers or leisure users?	Satisfactory – walkways were clearly marked for pedestrians and cars accessing the ferry via the ferry slipway. The small vessel slipway was just used by members of the public, so no walkways were marked.		HJA/SRB
		Is the type and condition of quayside surface appropriate to the operation?	Satisfactory – the slipway was generally in good condition and free of marine growth. Observation – the ferry slipway had some obvious potholes and was considered to be in need of surface maintenance. Observation – the surface of the bottom of the small vessel slip was poor and uneven. There was also a reasonable sized step, that was not marked. See Image B10.	Recommendation – ferry slipway surface should be reviewed, and repair arranged if trip hazards are identified. Recommendation – the small vessel slipway surface is repaired, and the step is incorporated into a slope or marked.	HJA/SRB
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 – there was an access ladder fitted on to the ferry slipway. Observation – a rope is used to help prevent an accidental fall from the top of the ladder. See Image B11	Recommendation – a suitable karabiner and wire (stainless steel) is used to replace the rope, allowing safe access to and from the ladder when required.	HJA/SRB
		Is there appropriate LSE at quay edge?	Satisfactory – Life saving equipment (life rings) were installed at the required intervals. Observation – there was no lifesaving equipment accessible off the small vessel slip way	Recommendation – move one life ring to the south side of the handrail facing the small vessel slip	HJA/SRB

Reference	Subject	Evidence Required For Compliance	Observation	Recommendations	Auditor
SIP 005	Bollards and securing equipment	Does the general condition of bollards appear to be in good order?	Satisfactory – the mooring rings on the small vessel slip way are in good condition. Mooring rings on the ferry slip were in good condition but rusted. Observation – there was one bollard on the north edge of the ferry slipway that lacked maintenance.	Recommendation – bollard is either maintained or removed if no longer in use	HJA/SRB
		Are the bollards numbered and Safe Working Load (SWL) shown?	Observation – there was no (obvious) SWL for the bollard. Observation – there was no (obvious) numbering of the mooring bollard.	Recommendation – bollards should be marked with their SWL. Recommendation – bollards should be numbered for ease of identification.	HJA/SRB
		Are additional bollards/rings required?	Satisfactory – in the auditor’s opinion, mooring rings on the ferry slip were adequate and suitable for the vessels using them. Observation – through anecdotal information and observation the mooring rings were judged to be unfit for use due to construction.	Recommendation – repair or replace mooring rings to ensure they are suitable for vessels.	HJA/SRB
SIP 005	Fenders	Is the fendering appropriate to the vessel being handled?	Not applicable		HJA/SRB
		Is the condition of the fendering in good order?	Not applicable		HJA/SRB
		Are chaffing plates used?	Not applicable		HJA/SRB
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 – light units were installed around the pier and were considered sufficient for operations (note, the onsite checks were carried out in daylight, lighting at night was not seen).		HJA/SRB
ACOP 58-60	Layout	Is adequate separation delineated between quayside operations?	Satisfactory – walkways were clearly marked for pedestrians and cars accessing the ferry via the slipway.		HJA/SRB
ACOP 82	Signage	Is appropriate signs and markings provided	Satisfactory – signage was evident at all slipways.		HJA/SRB



Image B10. Iona, small vessel slipway step and poor quality surface



Image B11. Iona, access ladder is blocked by rope

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