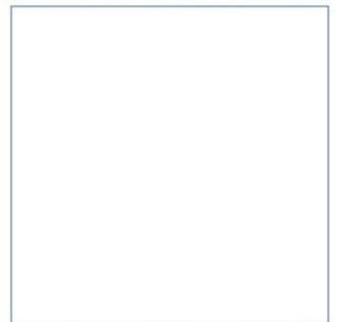
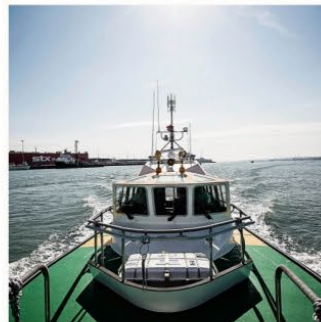
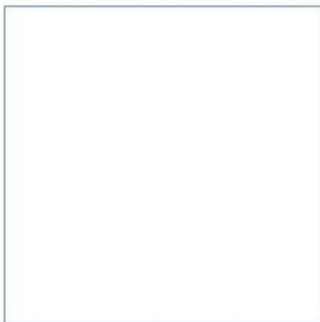
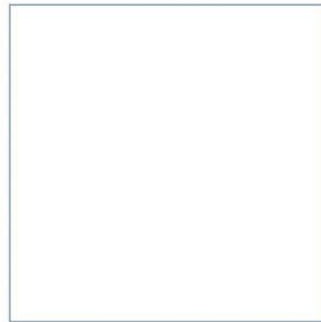


Argyll and Bute Council

Port Marine Safety Code

Audit: Campbeltown 2024

October 2024



Innovative Thinking - Sustainable Solutions

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Port Marine Safety Code

Audit: Campbeltown 2024




October 2024



Source: https://www.argyll-bute.gov.uk/sites/default/files/migrated_files/marina-8.jpg

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Author

M.J. Smedley

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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

Campbeltown Harbour is at the south end of the Kintyre Peninsula, facing eastwards to the First of Clyde. Argyll and Bute Council (A&BC) is the Statutory Harbour Authority (SHA) for Campbeltown Harbour with an area defined in the Campbeltown Harbour Acts and Orders 1846 to 2011. The harbour limits as recorded by Marine Scotland's database are shown in Figure 1. A&BC is also the Local Lighthouse Authority (LLA) with respect to aids to navigation through Section 193 of the Merchant Shipping Act 1995. A&BC is also the Competent Harbour Authority in accordance with 'The Argyll and Bute Council (Pilotage Powers Order) 2007'. This provides A&BC with a duty to provide pilotage for Campbeltown Harbour as required in the Pilotage Act 1987.

Campbeltown Harbour has a number of marine facilities, including the North Atlantic Treaty Organization (NATO) refuelling jetty on the south shore of the harbour. This facility provides refuelling to Government and visiting military vessels, with the infrastructure owned by the Ministry of Defence (MOD) and operated by the Oils and Pipeline Agency (OPA). At the western end of the harbour, the town of Campbeltown has two quays; these are termed the 'New Quay' and the 'Old Quay'. The New Quay is a general cargo berth of 120 m in length, with a dedicated Roll-on, Roll-off (RoRo) terminal and linkspan on its eastern side. The cargo berth is routinely used for cut timber, but can take a range of cargo types. The 'Old Quay' is an 'L' shape with two 60 m sides and a 90 m quay return. The quay is predominantly used by fish vessels including resident vessels and visiting fishing vessels. The 'Old Quay' also has the Royal National Lifeboat Institute (RNLI) berth and access to the adjacent Campbeltown Marina. The marina is owned by A&BC and operated by a contracted third party.

Other facilities in the harbour include a discussed fishing pier, a non-operational shipyard (privately owned) and a sailing club operating from a slipway on the north shore of the harbour.



Figure 1. Campbeltown Harbour Limits

2 Purpose and Method

2.1 Audit scope

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

2.2.1 Definitions

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.

2.2.2 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 Campbeltown Harbour as two visits. The first visit was conducted on 21 July 2024 to observe an act of Pilotage on the vessel MV Runner. The second visit was conducted on the 03 September 2024 to review harbour operations.

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, 2019a) and SIP 014 'Guidance on Safe Access and Egress' (PSS, 2019b) have been used. The Appendix tables to this report contain the test questions and evidence, noting down compliance, non-compliance and observational remarks.

2.4 Auditor

The following auditor conducted this audit.




Team Member	Initials	Company, Designation
Monty Smedley	MJS	ABPmer, Associate Maritime Consultant Lead Auditor for Quality Management Systems (QMS ISO 9001) Designed Person (PMSC) Argyll and Bute Council
Capt. Rod Lewis	RAL	ABPmer Associate Maritime Consultant Auditor for 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
John Willis	JW	Campbeltown – Assistant Harbour Master
Julie Hendry	JH	Marine Operations – Admin Officer
Capt. Jonathon Hague	Capt. JH	Campbeltown Authorised Pilot – Association of Forth Pilots
Scott Reid	SR	Marine Operations Manager
Stephen Scally	SS	Campbeltown – Harbour Master

3 Audit Summary

Number	Key Measures Ten-Point 'Health Check'			
1	Duty Holder	0	2	4
2	Designated Person	0	0	2
3	Legislation	0	2	5
4	Duties and Powers	0	19	48
5	Risk Assessment	0	4	5
6	MSMS	0	4	10
7	Review and Audit	0	2	4
8	Competence	0	0	2
9	Plan	0	0	3
10	Aids to Navigation	0	0	2
Total		0	33	85

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 Campbeltown Harbour is found **to be fully compliant** with the requirements of the Port Marine Safety Code.

The following two areas of best practice were found during the audit:

- Provision and maintenance of Aids to Navigation is recognised as an area of best practice with a 100% availability for Category 3 and 99.76% for Category 2 Aids.
- Marine and operational risk assessments are conducted with the active involvement of the Pier Operatives. Toolbox talks are held and recorded, which is considered to be a best practice approach.
- The Pilot boarding was undertaken in compliance with best practice. The Master/Pilot Exchange (MPX) was accurately handled; during the pilotage trip it was noted that information exchange continued. Delivery of Pilotage Duty is considered to be an area of best practice.

The PMSC audit identified 33 observations relating to improvement opportunities for management consideration, the detailed findings being presented in Appendix A. The following points identify the more significant items:

- At the time of audit, not all Councillors on the Harbour Board have attended Duty Holder training, the Marine Safety Plan has an objective of 100% attendance. It is recommended that members of the Harbour Board who have not attend Duty Holder training, complete this training as soon as practical.
- Whilst Council staff are actively engaged in risk assessment reviews, there is limited evidence of wider stakeholder consultation and engagement in marine risk assessments. The experience and knowledge of harbour users should be sought, and their engagement documented in the process.
- There is no Standard Operating Procedures (SOP) detailing how Special Directions are given or recorded by the Harbour Master team.
- The Marine Safety Management System (MSMS) does not provide information on the port and harbour stakeholder engagement process.

- A&BC does not have a formalised process for checking commercially operated Coded vessels at its ports, harbours or piers. It is recommended that the Council considers the requirements of the 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 operating within the Authority's area.
- There is evidence that Pilotage has been reviewed in 2021 when the Pilotage Manual (including Pilotage Directions) was updated. It is recommended that A&BC, as the CHA, formally review the need for Pilotage. This is an expectation of both the Pilotage Act 1987 and the Code.
- At the time of audit, the Pilotage Directions were not published (for example, available on the Council's website). The Council, as CHA must publish a controlled copy of the Pilotage Directions for Campbeltown on its website. The directions should only be published once they have been consulted upon by users of the harbour.
- There is no evidence of a published passage plan, or detailed passage planning information available to mariners accessing the harbour. A&BC does have information for Campbeltown Harbour on its website, but this is not considered detailed enough to allow effective passage planning by visiting vessels. Any vessels using a Campbeltown Pilot will have the passage plan provided to them as part of the Pilotage service. A&BC, as CHA, should publish a passage plan or passage plan guidance on their website.

Marine operations and quayside checks were also carried out, three observations were identified, the detailed findings being presented in Appendix B.

- The wooden edge protection beams at the RoRo berth and the Old Quay have deteriorated.
- The Old Quay bollards were not painted, were not numbered, or Safe Working Loads (SWL) identified.
- At the RoRo ferry terminal, one egress ladder was missing the cope level hand-grab bar; this should be repaired.

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.

Port Skills and Safety (PSS), 2019. Guidance on Mooring, SIP 005. March 2019.

Port Skills and Safety (PSS), 2019b. Guidance on Safe Access and Egress, SIP 014. September 2019.

4.1 Websites

<https://forthpilots.com/forth-pilots-mission-statement>

<https://www.argyll-bute.gov.uk/fees/24-25/marine>

<https://www.argyll-bute.gov.uk/moderngov/ieListDocuments.aspx?CIId=567&MIId=15635&Ver=4>

<https://www.argyll-bute.gov.uk/moderngov/ieListMeetings.aspx?Committeed=567>

<https://www.argyll-bute.gov.uk/moderngov/mgCommitteeDetails.aspx?ID=567>

<https://www.argyll-bute.gov.uk/my-council/leon-e-learning>

<https://www.argyll-bute.gov.uk/roads-and-travel/marine-services/campbeltown-harbour>

https://www.argyll-bute.gov.uk/sites/default/files/2023-05/dp_contact_information3_abc.pdf

https://www.argyll-bute.gov.uk/sites/default/files/migrated_files/dangerous_goods_notification_procedures_may_2020.pdf

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

5 Abbreviations/Acronyms

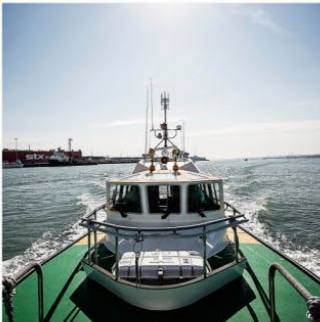
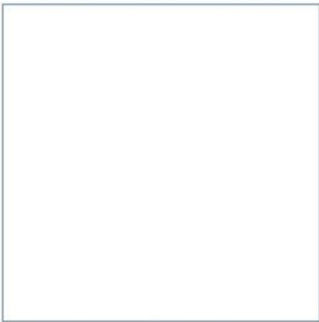
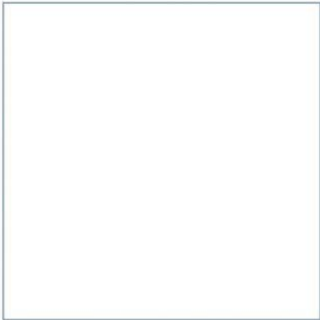
A&BC	Argyll and Bute Council
ACOP	Approved Code of Practice and Guidance
AtoN	Aid(s) to Navigation
BPA	British Ports Association
CARP	Critical Activity Recover Plan
Cat	Category
CERS	Consolidated European Reporting System
CFL	CalMac Ferries Limited
CHA	Competent Harbour Authority
DfT	Department for Transport
DGHAR	Dangerous Goods in Harbour Areas Regulations
DRA	Dynamic Risk Assessment
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
HRO	Harbour Revision Order
HSE	Health and Safety Executive
IMO	International Maritime Organization
ISO	International Organization for Standardization
ISPO	International Standard for Marine Pilotage
ISPS	International Ship and Port Facility
KHM	King's Harbour Master
KPI	Key Performance Indicator
LATON	Local Aids to Navigation
LEON	Council online e-learning platform
LLA	Local Lighthouse Authority
LOA	Length Overall
LPS	Local Port Service
LSE	Lifesaving Equipment
MAIB	Marine Accident Investigation Branch
MARNIS	Marine Risk Software Produced by ABPmer
MCA	Maritime and Coastguard Agency
MGN	Marine Guidance Notes
MHR iTrent	Product name for the human resource and payroll software system
MOD	Ministry of Defence
MPX	Master/Pilot Exchange
MS	Microsoft
MSMS	Marine Safety Management System
MV	Motor Vessel / Merchant Vessel
n/a	Not Applicable
NATO	North Atlantic Treaty Organization
OPA	Oils and Pipeline Agency
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
PPU	Portable Pilot Unit

PSS	Port Skills and Safety
QMS	Quality Management System
RATSA	Railways and Transportation Safety Act
RNLI	Royal National Lifeboat Institute
RoRo	Roll-on, Roll-off
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
VHF	Very High Frequency
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), 'Policies and Statements', Volume 1, revision 02, issued 21 March 2024. The MSMS, Section 3.1 states: <i>"Harbour Authorities have a range of statutory and non-statutory duties and powers relating to marine operations. The Council has a Duty of reasonable Care to its harbour users and will ensure the safety at work of employees and other persons who may be affected by the Authority's activities as far as is reasonably practicable to do so"</i> . Additionally, Section 10 'Conservancy' also states 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 – the harbour authority has a copy of its local legislation. Local Acts and Orders 1846 to 2011 include: <ul style="list-style-type: none"> ▪ The Campbeltown Harbour and Burgh Act', 1846. ▪ The Campbeltown Burgh and Harbour Act', 1876. ▪ Campbeltown Harbour and Gas Order 1925. ▪ Campbeltown Harbour Water and Gas Order Confirmation, 1935. ▪ Campbeltown Water Order Confirmation 1946. ▪ The Campbeltown (Ferry Terminal) Harbour Revision Order 1996. ▪ The Argyll and Bute Council (Pilotage Powers) 2007. ▪ The Campbeltown Harbour Revision Order 2011. 		MJS_010	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?	Satisfactory – the HDPCA has been incorporated into the Campbeltown Burgh and Harbour Act, 1876, Section 5. Observation – as only part of the 1876 Act is available, it cannot be fully ascertained which sections of the 1847 HDPCA have been incorporated (or not).	Recommend – the full 1876 Act is obtained from Parliamentary Archives Section 5 is reviewed to understand which parts of the 1847 Act have been incorporated.	MJS_010	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 1.6.		MJS_001	MJS
1.8	The Duty Holder	Are the Duty Holder’s responsibilities for compliance with Code defined?	Satisfactory – the MSMS, Section 1.4 lists the principal requirements of the Duty Holder.		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. Periodically the Harbour Board and Duty Holder visit one of the Councils ports, harbours or piers. The Harbour Board were invited to the Campbeltown Emergency Response Exercise in November 2021 and undertook an operational tour of Oban Harbour in September 2021. Observation – the Council is encouraged to arrange an opportunity in 2025 for the Duty Holder and Board to visit one of the Authority’s ports, harbours or piers.	Recommend – to provide awareness of the Council’s ports, harbours and piers, arrange an annual visit for the Duty Holder and Board.	MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
Cont. 1.10	Cont. The Duty Holder	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 – four (of the eight) Councillors of the Harbour Board, plus the Council’s Executive Director of Development and Infrastructure Services (as Duty Holder) have attended training. Observation – not all Councillors on the Harbour Board have attended Duty Holder training, the Marine Safety Plan has an objective of 100% attendance.	Recommend – that members of the Harbour Board who have not attend Duty Holder training, complete this training as soon as practical.	MJS_011 https://www.argyll-bute.gov.uk/moderngov/mgCommitteeDetails.aspx?ID=567	MJS
1.11-1.12	The Designated Person	Has the Harbour Authority appointed an individual as the Designated Person?	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 are hosted on the Council’s website.		https://www.argyll-bute.gov.uk/sites/default/files/2023-05/dp_contact_information3_abc.pdf	MJS
		Is the Designated Person’s role explained in the MSMS?	Satisfactory – the MSMS, Section 2.0 lists the duties of the Designated Person.		MJS_001	MJS
1.13	Chief Executive [or equivalent]]	Have executive and operational responsibilities for marine safety been clearly assigned?	Satisfactory – the MSMS, Section 1.6.1 lists the responsibilities of the ‘Head of Roads and Infrastructure Services’, and Section 1.6.2 lists the responsibilities of the ‘Marine Operations Manager’.		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

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
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 are appointed by the Harbour Authority to 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 1.6.4 lists specific duties. Additionally, A&BC also appoints Pier Masters in selected locations, the duties of which are identified in Section 1.6.5.		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 with responsibility for Roads and Infrastructure Services; major issues are raised to the Harbour Board. Evidence from the Harbour Board meeting of 12 September 2024 provided.		MJS_012 MJS_013 https://www.argyll-bute.gov.uk/moderngov/ieListMeetings.aspx?CommitteId=567	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 1.6.3 lists the responsibilities of the Marine Technical Officer, and Section 1.6.6 provides detail on the Council’s Assistant Harbour Masters.		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.		MJS_014	MJS
2.3 – 2.6	Review existing powers	Does the Harbour Authority have an understanding of local legislation?	Satisfactory – the Harbour Authority has a list of local Acts and Orders for Campbeltown.		MJS_010	MJS
		Are local Acts and Harbour Orders referenced in MSMS?	Satisfactory – the MSMS, Section 3.2, has a list relevant local Acts or Orders. Campbeltown has local copies. Observation – Bruichladdich Pier is missing from the list in Section 3.2.	Recommend – adding Bruichladdich Pier, by virtue of the ‘Islay Piers Order 1904’, into Section 3.2.	MJS_001	MJS
		Have the Harbour Authority’s existing powers been reviewed?	Satisfactory – the Harbour Acts have been reviewed by A&BC lawyers. Recommendations for update have been presented to the Council and a Harbour Revision Order (HRO) consolidation process initiated. Evidence provided.		MJS_015 MJS_016 MJS_017	MJS
		Is the organisation’s jurisdiction mapped and clear?	Satisfactory – the Harbour Authority has a list of local Acts and Orders for Campbeltown, plus a map with the extent of the harbour limits shown. Observation – the harbour limits on the chart (Admiralty Chart Number 1864 ‘Harbours and Anchorages in Arran and Kintyre’, Campbeltown Loch Panel C) does not match the information held by Marine Scotland. The Campbeltown Harbour Order 1846, Schedule 38 defines the limits at the Loch entrance, but is silent (does not mention) limits between Island Davaar and the mainland of Kintyre.	Recommend – there is a discrepancy between the charted limits between the Island Davaar and the mainland of Kintyre limits on UK Hydrographic Office (UKHO) products, and information held by Marine Scotland (which shows the limits as following ‘The Doirlinn’ causeway. The Campbeltown Harbour Order 1846, Schedule 38 is silent on this boundary. This should be raised with the UKHO.	MJS_010 MJS_018	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 5 describes the assessment methodology. A set of 15 risk assessments are in place for the harbour. The hazard scenarios cover a range of foreseeable eventualities including: Contact with structures, Collisions, Grounding/Stranding, Equipment Failure, Event Management and Fire/Explosions.</p> <p>Observation – many of the assessment review dates are set for January or February.</p>	<p>Recommend – that a staggered approach to risk assessment review is adopted, on a cyclic basis, over the year.</p>	MJS_001 MJS_019	MJS
		How does the organisation ensure those undertaking marine risk assessment are competent in the role?	<p>Satisfactory – the Harbour Master has undertaken a training course for marine risk completed on 05 April 2016, certificate evidenced.</p> <p>Observation – the Deputy Harbour Master managed the day-to-day updates to the risk assessments and has not attended specific training on MARNIS software.</p> <p>Observation – there is no dedicated training course for Marine Risk Management, evidence from audits suggests that staff skill sets in this area are usually evidenced through previous training (for example, Certificates of Competence as deck officers, or academic training courses). Whilst it is expected that the recruitment process will identify these as desirable qualifications, there is no recognised route for obtaining these which is promoted by A&BC.</p>	<p>Recommend – at the next opportunity, the Deputy Harbour Master should attend marine risk and MARNIS user training.</p> <p>Recommend – a training course, or process for obtaining suitable qualification(s) in Marine Risk Management is considered. This should include Marine Risk Assessment, management of risk controls and accident-incident reporting and investigation processes.</p>	MJS_020	MJS
		Are stakeholders included in marine risk review/assessments?	<p>Satisfactory – risk assessments are conducted with the active involvement of the Pier Operatives. Tool box talks are held and recorded, this is considered best practice.</p> <p>Observation – whilst Council staff are actively engaged in marine risk assessment reviews, there is limited evidence of wider stakeholder consultation and engagement in the risk review and assessment process.</p>	<p>Recommend – the experience and knowledge of harbour users should be sought, and their engagement documented in marine risk assessments.</p>	MJS_019 MJS_021	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?	Satisfactory – the MSMS, Section 5.1.3 states that: <i>“Navigational risk assessments are maintained for the main ports and harbours as a minimum. The regular (annual) review of these risk assessments and any new risk assessments caused by operational changes will identify new risks”.</i>		MJS_001	MJS
		Is a system of Dynamic Risk Assessment (DRA) used?	Satisfactory – the MSMS, Section 5.2 provides information on the DRA requirement. A&BC has a DRA flowchart to aid decision making.		MJS_001 MJS_025	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), ‘Policies and Statements’, Volume 1, revision 02, issued 21 March 2024. A revision history table is included, with a draft noted as being issued in January 2023. The MSMS was approved by the Harbour Board on 21 March 2024. The MSMS, Section 7.1 under the sub-heading ‘periodic review’ identifies that: <i>“Additional to the above the Marine Safety Management System will be reviewed and reissued by the Marine Operations Manager every three years.”</i> Standard Operating Procedures (SOPs) are authored by the port and held as a catalogue. Evidence sighted. Observation – the MSMS on A&BC’s website is Revision 02, however the front page and headers are dated November 2023.	Recommend – the MSMS date on the front cover and footers is updated to match the revision number in the Document Record.	MJS_001 MJS_022 MJS_023 MJS_024 MJS_028	MJS
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 are detailed in the ‘Marine Safety Plan’ as standing objectives, these are measured and reported on annually with the outcome recorded in the published plan. The MSMS, Section 9.1 provides information on active and reactive system measurements.		MJS_001 MJS_007	MJS
2.16	MSMS assigning responsibility	Does the MSMS explicitly assign responsibility for appropriate safety/conservancy matters?	Satisfactory – the MSMS, Section 1.6 ‘Marine Operational Management Structure’ details the assignment of responsibility to key officers of the Authority.		MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
2.17	MSMS Consultation	Are forum/consultation meetings held?	<p>Satisfactory – the ‘Navigational Safety, Pilotage and Towage Policy’ states that A&BC will: “Consult widely with port and other relevant stakeholders in respect of navigational safety issues.” Active engagement occurs as a day-to-day process at Campbeltown, there is an open-door policy, with discussion at the quayside and at the harbour office. Harbour meetings have been held previously in person and over MS Teams.</p> <p>Observation – in Campbeltown, there are a number of distinct user groups, but no clear engagement strategy:</p> <ul style="list-style-type: none"> ▪ The Royal National Lifeboat Institute (RNLI). ▪ The Marina ▪ The Oil & Pipelines Agency (OPA) ▪ The Fishermen’s Association ▪ CalMac Ferries Limited (CFL) ▪ Independent operators. <p>Observation – the MSMS does not provide information on stakeholder engagement processes.</p>	<p>Recommend – the engagement with harbour user groups is considered and written down as a strategy that can be delivered systematically, with the recording of meetings/discussion and any actions from these.</p> <p>Recommend – a section addressing stakeholder consultation is added to the MSMS.</p>	<p>MJS_001 MJS_002</p> <p>Anecdotal</p>	MJS
2.18	Competence standards	Are personnel qualified and trained for their marine safety role?	<p>Satisfactory – training records are held centrally in MHR iTrent. A&BC uses a dedicated harbour training matrix which identifies the skill set needed by at each location. Many of the training courses are accessed on the online e-learning platform ‘LEON’. Induction and training records were sampled for Campbeltown staff. On training, the MSMS, Section 8.1 states: “The Marine Operations Department shall maintain a training matrix for all staff and the respective line managers are responsible for keeping it up-to-date. The training matrix and training records is held and maintained centrally”.</p>		<p>MJS_001 MJS_003 MJS_026 MJS_027 MJS_047</p> <p>https://www.argyll-bute.gov.uk/my-council/leon-e-learning</p>	MJS
		Is there a policy on revalidation or maintenance of qualifications in place?	<p>Satisfactory – a Marine Training Policy is in place, dated v1 August 2023, and available for download from the A&BC website.</p>		<p>MJS_003</p>	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
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 4.5 details the process to follow should an incident occur; this addresses investigation and reporting. Evidence of the sailing vessel <i>Encore</i> grounding, and the ferry <i>Loch Ridden</i> grounding (on the slipway) sampled. The following provides a summary of totals per year:</p> <ul style="list-style-type: none"> ▪ 2 incidents – 2024 (to date) ▪ 2 incidents - 2023 ▪ 3 incidents - 2022 ▪ 2 incidents – 2021 ▪ 0 incidents – 2020 ▪ 6 incidents – 2019 		<p>MJS_001 MJS_029 MJS_030</p> <p>Paper based office records</p>	MJS
GtGP 13.2	Incidents involving Death or Crime	Are procedures in place for incidents involving death or crime?	<p>Satisfactory – the MSMS, Section 4.6 details actions to be taken in the event of death or crime. Deaths have occurred in the harbour (attributed to mental health issues) plus vandalism. Liaison with the Policy is very good, with officers based in Campbeltown and visiting the harbour office periodically.</p>		<p>MJS_001</p> <p>Anecdotal</p>	MJS
GtGP 13.9	Incident publication	Does the Harbour Authority disseminate information from accident investigations?	<p>Satisfactory – the MSMS, Section 4.8 details statutory reporting requirements, incident reports are distributed to the Scottish Environment Protection Agency (SEPA) and the MCA.</p>		<p>MJS_001</p> <p>Anecdotal</p>	MJS
2.23	Incident statutory reporting	Are procedures for reporting incidents to the MAIB in place?	<p>Satisfactory – the MSMS, Section 4.8 details statutory reporting requirements, including the Marine Guidance Note (MGN) 564 ‘Incident reporting and investigation’. There have been no MAIB reportable incidents at Campbeltown.</p> <p>Observation – anecdotal discussion identified that harbour staff considered it the role of the Coastguard and/or vessel Master to report relevant incidents to the MAIB.</p>	<p>Recommend – a reminder is provided to Council harbour staff that MAIB reporting is a requirement of the Harbour Authority. The MARNIS reporting flow-process may assist in identifying reportable incidents.</p>	<p>MJS_001</p>	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
2.24	Monitoring performance and auditing	Has the MSMS been subject to audit (internal and/or external)?	<p>Satisfactory – the last external audit of the MSMS was conducted in 2023. The MSMS, Section 7.2 and 7.3 detail the audit process for A&BC. Internal audits are arranged for PMSC and Health and Safety, evidence of periodic auditing was provided.</p> <p>Observation – there is no internal audit schedule, audits are arranged to meet specific requirements.</p>	<p>Recommend – A&BC develop a schedule of internal audits that test the application of the MSMS and SOPs at each port location.</p>	MJS_001 MJS_031 MJS_045 MJS_046	MJS
2.25	Enforcement	Are local officers aware of enforcement powers and responsibilities?	Satisfactory – the MSMS, Section 4.9 provides the enforcement procedure.		MJS_001	MJS
		Is there a policy on enforcement and prosecution in place?	Satisfactory – A&BC publish an Enforcement and Prosecution policy, as Version 1, dated August 2023.		MJS_004	MJS
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 evidenced through the publication of Navigational Safety, Pilotage and Towage Policy' and its Marine Safety Plan, published on A&BC's website.		MJS_002	MJS
2.27	Plan assessment	Is an assessment of the organisation's performance against the plan published?	Satisfactory – the Marine Safety Plan contains an ongoing assessment of the plan.		MJS_007	MJS
2.28	Safety plan for marine operations	Is a 'Safety Plan for Marine Operations' published (every three years).	Satisfactory – the 'Marine Safety Plan' was approved for issue by the Harbour Board on 021 March 2024, and is included as an annex to the Board meeting. The Marine Safety Plan is hosted on the A&BC's website. The plan covers the years 2024 to 2026 and includes objectives with measures reported in yearly intervals.		MJS_007 https://www.argyll-bute.gov.uk/moderngov/ieListDocuments.aspx?Clid=567&Mid=15635&Ver=4	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

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendation	Evidence Reference	Auditor
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 – A&BC 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, guided by the MCA, as the Council has confirmed it was not (at that time) fully compliant with the requirements of the Code. At the time of writing the letter A&BC was working towards full compliance in a number of key areas, including legislation review, policy review, MSMS documentation and creation of Standard Operating Procedures (SOPs).		MJS_032 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 is one other organisation that operates a facility in the harbour, this is the North Atlantic Treaty Organization (NATO) fuelling terminal. The terminal is owned and operated by 'The Oils & Pipelines Agency' (OPA). Dialogue on PMSC compliance has been conducted on 08 May 2024. Additionally, pilotage issues have been discussed with the Ministry of Defence (MOD) via the King's Harbour Master (KHM) in the Clyde. Observation – a formalised exchange of information and notification process of PMSC Compliance to/from the OPA could not be evidenced.	Recommend – the exchange of information and requests on PMSC Compliance is retained by A&BC. This should include any shared risk assessments, SOPs, emergency plans and exercises.	Anecdotal	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 – the MSMS, Section 9.0 'Marine Safety Plan' outlines the requirements from the Code and points to the 'Marine Safety Plan' to deliver this requirement. The Marine Safety Plan states that: <i>"The Council, as Harbour Authority, recognises that it has a duty of care to those using its ports, harbours and piers; which means the Council has an obligation for safe and efficient use of its marine facilities. To this end, Argyll & Bute Council's Harbour Board has approved a set of policies in support of the management and regulation of marine operations at our facilities which are embedded in the MSMS."</i>		MJS_001 MJS_007	MJS
3.5	Open port duty	Is the port or harbour subject to Open Port Duty?	Satisfactory – the HDPCA has been incorporated into the Campbeltown Burgh and Harbour Act, 1876, Section 5. It is therefore assumed that Open Port Duty applies to Campbeltown Harbour. Observation – as only part of the 1876 Act is available, it cannot be fully ascertained if Section 33 of the 1847 HDPCA has been incorporated (or not).	Recommend – the full 1876 Act is obtained from Parliamentary Archives Section 5 is reviewed to understand which parts of the 1847 Act have been incorporated.	MJS_010	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. 	Satisfactory – the MSMS, Section 10.0 providing information on the Council'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 MSMS, Section 10.1 details hydrography, with the last bathymetric survey was conducted on 12 August 2022. Information was passed by the survey contractor to UKHO, evidence seen.		MJS_001 MJS_033	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_034	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 Campbeltown has any powers to licence third party marine works under its local Acts and Orders. Mooring licences are required for individual and commercial moorings, via the Crown Estate, with navigation consent required from A&BC as the SHA.		MJS_010 MJS_052 MJS_053 MJS_054	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 	Satisfactory – the MSMS, Section 3.1 lists National legislation, including several Acts relating to Environmental Duties. These requirements are delivered through the Harbour's services, including the Local Port Service (LPS) which monitors and advises vessel Masters and members of the public. A&BC also issue a 'Marine Conservancy and Hydrographic Policy', Version 1, issued August 2023 which has links to environmental duties. Information regarding Campbeltown and its local habitat is contained in the Oil Pollution Response plan.		MJS_001 MJS_005 MJS_035	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 30 September 2023 and is valid until the 26 January 2029. The annual OPRC return form was evidenced. A&BC maintain a Critical Activity Recover Plan (CARP) which incorporates the Council's Civil Contingency duties. Campbeltown has an emergency plan.		MJS_035 MJS_036	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 Campbeltown, exercise ‘Mount Stuart’ was run in September 2023 as a multi-agency emergency response test. Post exercise report provided. An emergency plan schedule was evidence.		MJS_037 MJS_038 MJS_039 MJS_040	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 2011, for the powers to construct works and carry out dredging.		MJS_010	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?	Satisfactory – a letter of appointment as the Campbeltown Harbour Master is held, date of appointment 02 September 2022.		MJS_042	MJS
4.3 – 4.5	Byelaws	Does the organisation have powers to make Byelaws, are these published?	Satisfactory – under the ‘The Campbeltown Harbour Act and Orders 1846 to 2011’ Byelaws powers are available. To date, no Byelaws have been issued.		MJS_010	MJS
		Date of last byelaw review?	Not applicable – no byelaws have been issued		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?	Satisfactory – the MSMS, Section 5.1.1, details the use of Special Direction stating: <i>“Special directions – may be given by the harbour master, deputies or their assistants: these directions are time and vessel specific and are apt for operational purposes of short duration and for emergencies”</i> . Observation – there is no SOP detailing how Special Directions are given or recorded by the Harbour Master, relayed via LPS, or otherwise.	Recommendation – an SOP for the use of Special Directions is drafted and agreed. This should detail the giving of the direction and its recording.	MJS_001	MJS
4.8	General Directions	Are the powers of General Directions available to the Harbour?	Not applicable – powers of General Direction are not available. Auditor note: the harbour has a set of Navigational Guidelines, which are in draft, with the intention of issuing these until powers of General Direction are available.		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 listed in the MSMS, Section 3.1 under ‘National Legislation’. Additionally, Section 5.1.1 of the MSMS states: <i>“Dangerous vessel directions - permitting a Harbour Master to remove a vessel from the harbour in clearly defined circumstances”</i> .		MJS_001	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. 4.10 GtGP 6.4	Cont. Dangerous Vessels	Is the role of the Secretary of States' Representative for Maritime Salvage and Intervention (SOSREP) acknowledged?	Satisfactory – the MSMS, Section 4.4.3 details the role of the SOSREP.		MJS_001	MJS
GtGP 6.2	Dangerous Substances	Are there clear requirements for declaration of dangerous goods/substances?	Satisfactory – the MSMS, Section 4.4.4 details the entry and control of dangerous goods and substances in the harbour. The Council's website contains reporting forms for 'Dangerous Good Notification Procedures'. At Campbeltown, CalMac (as ferry operator) manages the dangerous goods notification process if a ferry uses the terminal.		MJS_001 https://www.argyll-bute.gov.uk/site/default/files/migrated_files/dangerous_goods_notification_procedures_may_2020.pdf	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: <ul style="list-style-type: none"> ▪ Visual observation and communications by Very High Frequency (VHF) Channel 13, phone and email. ▪ Pre-arrival notification is used for any vessel over 80 m Length Overall (LOA). ▪ Under 80 m are booked in via the desk diary. ▪ LPS office, staffed by Port Operatives between 07:00-16:00 hr. Vessels pre-notified are met by Port Operatives (for line handling). Out of hours, there is a duty Harbour Master. The harbour team use WhatsApp for quick communications as a group. 		Observational	MJS
		Is vessel traffic monitoring information passed to the MCA by the quickest means?	Satisfactory – A&BC has a CERS login, evidence of a completed CERS logbook provided for the vessel 'Island Spirit' on 04 September 2024 seen.		Observational	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 harbour is staffed every day, between 07:00-16:00 hr, every day except Christmas Day and New Year’s Day (an on-call duty process is used out of hours).		MJS_007 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, Section 3.1 references the Railways and Transportation Safety Act (RATSA) 2003. A&BC has a Drink and Drugs Policy for its own staff. 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.	Recommend – the creation of an SOP or procedure to inform the Authority’s officers of their expected action for a drink or drugs offence under the RATSA 2003 Act.	MJS_001	MJS
4.11 GtGP 9.0	Pilotage	Conformity with Pilotage Manual and Policies	Satisfactory – one of the audit team accompanied the Class 1 Maritime Ltd Authorised Campbeltown Pilot on the inbound passage of vessel <i>MV Runner</i> (21 July 2024). Prior to the passage, the auditor observed the Risk Assessment and Tool Box Talk for the boat crew and mooring party and the Pilot populate the Master/Pilot Exchange (MPX). The Pilot boarding was undertaken in compliance with best practice. The MPX was accurately handled. During the pilotage, it was noted that information exchange continued. The vessel was berthed safely without issue. It was evidenced by the auditor that the harbour benefits from the experience and training provided by Class 1 Maritime Ltd (as a contracted Pilotage Service provider). This affords the harbour a very high level of Pilot competence. Good working relationships between the Class 1 Maritime Ltd Pilots and the Harbour Master and operations teams was observed. Delivery of Pilotage Duty is considered to be an area of best practice.		RAL_010 RAL_011 RAL_012 RAL_013 RAL_014 RAL_015 RAL_016 RAL_017 RAL_018 RAL_019 RAL_020 RAL_021 RAL_022 RAL_023 RAL_024 RAL_025 RAL_031 RAL_032	RAL
4.11 GtGP 9.0	Pilotage	Is the port a CHA?	Satisfactory – A&BC, as Harbour Authority, is identified as a Competent Harbour Authority (for Pilotage).		RAL_006	RAL

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. 4.11 GtGP 9.0	Cont. Pilotage	Has the requirement for pilotage been reviewed?	<p>Satisfactory – Pilotage was reviewed and informed the 2007 order; the Pilotage Manual and Pilotage Directions were first drafted in 2011.</p> <p>Observation – there is evidence that Pilotage has been reviewed in 2021 when the Pilotage Manual (including Pilotage Directions) was updated. It is understood there has been recent reviews of both the compulsory pilotage LOA for vessels inside the enclosed harbour and overall provision at the fuel jetty.</p>	<p>Recommend – A&BC, as CHA, formally review the need for Pilotage. This is an expectation of both the Pilotage Act 1987 and the PMSC.</p>	RAL_008 Anecdotal	RAL
4.12 GtGP 9.4	Pilotage Directions	Are Pilotage Directions issued?	<p>Satisfactory – Pilotage Directions sit within the (Pilotage Manual) there is a concise reference to Pilotage on the A&BC website, which states: <i>“Pilotage is compulsory for inbound and outbound vessels 80 m and over”</i>.</p> <p>Observation – it is understood that a request has been made for Pilotage Directions to be published in full on the A&BC website. At the time of audit, there was no evidence this has been done. Pilotage Directions are enforceable and should be promulgated to stakeholders to promote clear understanding. This is a requirement under the Pilotage Act 1987.</p>	<p>Recommend – A&BC, as CHA must publish a controlled copy of the Pilotage Directions for Campbeltown on its website. The directions should only be published once they have been consulted upon by users of the harbour. Information in the Pilotage Manual with any additional information that refers to Pilotage (for example PEC and boarding and landing operational information) may be included in Pilotage Direction schedules so this information can be updated outside of formal Pilotage Direction consultation requirements.</p>	RAL_008 https://www.argyll-bute.gov.uk/roads-and-travel/marine-services/campbeltown-harbour	RAL

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. 4.12 GtGP 9.4	Cont. Pilotage Directions	Were stakeholders consulted during the drafting phase of the most recent Pilotage Direction?	<p>Satisfactory – there is anecdotal evidence of consultation on the first draft of the Pilotage Directions. More recently, the Ministry of Defence (MOD) has been consulted in respect to the changes at the NATO fuel jetty and vessel agents in respect to the docks.</p> <p>Observation – there is no evidence of formal consultation on the Pilotage Directions.</p> <p>Observation – the Pilotage Directions refer to both a requirement for all vessels: <i>“carrying dangerous or polluting substances in bulk as defined in the Dangerous Substances in Harbour Areas Regulations 1987 and all vessels which are not gas free”</i> as requiring compulsory pilotage.</p> <p>Observation – the Pilotage Directions state: <i>“vessels which have Crown Immunity are exempted. For the purposes of Pilotage and Towage they operate in Campbeltown under the auspices of the Queen’s Harbour Master, Faslane but adhere to the general guidelines for operations within the Loch at Campbeltown”</i>. The Pilotage Act 1987 does not provide immunity for Crown vessels. This was previously the case (under the Pilotage Act 1913). A&BC, as CHA, may choose to exclude MOD vessels from the requirements of Pilotage, if supported through a risk-based decision.</p>	<p>Recommend – A&BC, as CHA, formally consult on the Pilotage Directions. Evidence of consultation should be retained for later reference. This is a requirement under the Pilotage Act 1987.</p> <p>Recommend – the Dangerous Substances in Harbour Areas Regulations 1987 were replaced by the ‘Dangerous Goods in Harbour Areas Regulations’ 2016 (DGHAR).</p> <p>Recommend – it is recommended that A&BC, as CHA, formally review the need for Pilotage, including the provisions for MOD vessels using the harbour with respect to Pilotage. There may be scope for an MOD Pilot to accompany the A&BC Authorised Pilot in circumstances that the A&BC CHA Pilot has ‘conduct’ of the vessel within the definition of the Pilotage Act 1987.</p>	RAL_008 Anecdotal	RAL

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. 4.12 GtGP 9.4	Cont. Pilotage Directions	Cont. Were stakeholders consulted during the drafting phase of the most recent Pilotage Direction?	<p>Observation – it is understood that the Harbour Master, from time-to-time requests that vessels less than 80 m LOA take a Pilot due to the manoeuvre being perceived as challenging and the master not being familiar with the CHA area. This circumstance is not defined in the Pilotage Directions.</p> <p>Observation –the Pilotage Directions make no reference to how the Directions apply to Tugs and Tows.</p> <p>Observation – the Pilotage Directions refer to all vessels <i>“which is deemed by the Harbour Master to be a danger or threat to the safe operation of the harbour due to defects, damage or handicap may be required to take the services of a Pilot even if exempted by size under the provisions of these Pilotage Directions”</i>. This is a helpful ‘catch all’ clause but does not, on its own, cover all circumstances that the Harbour Master may wish to have a Pilot onboard of a vessel. For example, the recent consideration of Pilotage for vessels under 80 m within the enclosed docks, both generally and in in specific weather conditions.</p>	<p>Recommend – the Pilotage Directions must contain relevant instructions for all circumstances, vessels less than 80 m LOA requiring a Pilot if considered necessary by the Harbour Master. For example, wording may read: <i>“all vessels or tows of more than 60.00 meters but less than 80.00 meters in length overall where a bona fide deck officer has not navigated the port on that vessel or a vessel of a similar class in the past 12 months, will use the services of an Authorised Pilot”</i>.</p> <p>Recommend – A&BC, as CHA, should review and consult the requirement for the Pilotage Directions to apply to Tugs and Tows.</p> <p>Recommend – A&BC, as CHA, should review this clause of the Pilotage Directions so as not to limit the circumstances the Harbour Master can enforce compulsory pilotage. For example, including weather and ‘any other reason’.</p>	RAL_008 Anecdotal	RAL

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
4.13 GtGP 9.4	Authorisation of pilots	Is the process for appointing Pilots referenced in the MSMS?	<p>Satisfactory – the following is noted on Pilot appointment:</p> <ul style="list-style-type: none"> A&BC, as CHA, has responsibilities for pilotage which are set out in the MSMS, Section 4.3. The intent to appoint competent and authorised Pilots is set out in the Navigational Safety, Pilotage & Towage Policy (August 2023). The specifics of the process for appointing Pilots are set out in the Pilotage Manual section 10 (2021). The CHA, whilst retaining the duty to keep pilotage under review (Section 2 of the Pilotage Act 1987), has contracted to Class 1 Maritime Ltd, in respect to the provision of the actual Pilotage and craft required for boarding and landing of pilots. Pilot Authorisations are made on behalf of the CHA by the appoint Harbour Master for Campbeltown, on behalf of the Harbour Authority. The auditor has been provided evidence of Pilot authorisations. 		<p>RAL_001 RAL_007 RAL_008 RAL_029 RAL_030</p>	RAL
4.14 GtGP 9.4.31	Pilot Training	Does the CHA implement the International Maritime Organisation (IMO) Resolution A960?	<p>Satisfactory – A&BC, as CHA, in contracting Pilotage from Class 1 Maritime Ltd, benefit from the comprehensive underpinning knowledge and training program of Forth Pilots (Class 1 Maritime Ltd is a company owned by Authorised Forth Pilots). Forth Ports has International Standard for Marine Pilotage (ISPO accreditation) which included the adoption of A960 principles. Section 10 off the Navigational Safety, Pilotage & Towage Policy (August 2023) makes a commitment to national standards National Regulations, Guidelines and Competency Standards including A960 which is referenced in the Code's GtGP.</p>		<p>RAL_007 RAL_008</p> <p>https://forthpilots.com/forth-pilots-mission-statement</p>	RAL

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
GtGP 9.5.43	Pilotage	Does the authority operate an effective Pilot Fatigue Management System?	Satisfactory – by rota design there is a Fatigue Management System. There are insufficient acts of Pilotage to warrant a more active system of Fatigue Management. Pilotage acts are naturally spaced and there is a compliment of five Authorised Pilots for Campbeltown. When a vessel docks and sails on the subsequent tide, the docking Pilot will book a hotel room to rest if taking the vessel out. If there are several tides between docking and sailing, the Pilot will return home and the sailing Pilot allocated from the compliment of Authorised Pilots.		Anecdotal, conversation with J. Hague during inbound pilotage of MV Runner and observed arrangements for overnight hotel.	RAL
4.15 – 4.16 GtGP 9.5	Pilot Exemption Certificates	Is a clear process for the issuing of Pilotage Exemption Certificate (PECs)?	Satisfactory – there is a clear process for issuing PEC set out in the Pilotage Manual Observation – there is no evidence that the PEC process is published.	Recommend – A&BC, as CHA, publishes the PEC process. For example, as an annex or schedule to the Pilotage Directions.	RAL_008 RAL_027 RAL_028	RAL
		Are the requirements equivalent to those for an authorised Pilot?	Satisfactory – the Pilotage Manual sets out a knowledge and tripping requirement no greater but equivalent to that for an Authorised Pilot.		RAL-008 RAL_027 RAL_028	RAL
GtGP 8.7.15 – 8.8.10	Port Passage Plan	Is there a published passage plan?	Satisfactory – there is limited passage planning information on the A&BC website for Campbeltown, there is a Pilotage passage plan within the MPX, but this is not promulgated to vessels until the Pilot boards. Observation – there is no evidence of a published passage plan or comprehensive guidance promulgated to PEC holders. Class 1 Maritime Authorised Pilots have a comprehensive passage plan on their PPU units.	Recommend – A&BC, as CHA, should publish a passage plan or passage plan guidance on their website. This could be achieved through a standing notice to mariners promulgated through the existing notice to mariners page.	MJS_048 https://www.argyll-bute.gov.uk/roads-and-travel/marine-services/campbeltown-harbour	RAL
GtGP 8.10	Recreational navigation	Are recreational users of the harbour considered?	Satisfactory – information is published on A&BC's website, and also on the port entry information shown on the Campbeltown Harbour section of the A&BC website.		https://www.argyll-bute.gov.uk/roads-and-travel/marine-services/Campbeltown-harbour	MJS

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
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/24-25/marine	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: <ul style="list-style-type: none"> ▪ 2 fixed red lights (vertical) on the New Quay. ▪ 2 fixed green lights (vertical) on the Old Quay. ▪ East Cardinal (located north of the Old Quay and Marina. Within the harbour, there is an isolated danger, leading lights, lateral buoyage and NATO fuel terminal red AtoN, all of which is maintained by the MOD.		MJS_049	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 2021 to April 2024 as: <ul style="list-style-type: none"> ▪ Cat 2 = 99.76% (target is 99.0%) ▪ Cat 3 = 100% (target is 97.0%) Provision and maintenance of Aids to Navigation is recognised as an area of best practice .		MJS_049	MJS
4.25-4.32	Wrecks, Abandoned or unserviceable vessels	Does the MSMS refer to powers for dealing with wrecks?	Satisfactory – the MSMS, Section 10.4 addresses wrecks within the Conservancy section and with respect to marking of wrecks. There is one abandoned vessel, the ‘Lady Craig’ left in 2023. There is no recent history of wrecks in the harbour.		MJS_001 Anecdotal	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?	Satisfactory – Pilot boats are provided by Class 1 Maritime Ltd. There are 3 Pilot vessels available for use in Pilot transfer, one of which (at the time of audit) was awaiting inspection and certification. Evidence viewed of workboat certification (with Pilot Boat endorsement) provided Bluebird had her last out of water inspection in June 2024. Maintenance records, schedules and reports were all provided. The boats are crewed locally by A&BC harbour staff, evidence of qualifications, drills and exercises provided.		RAL_021 RAL_022 RAL_035 RAL_036 RAL_037 RAL_038 RAL_039 RAL_040 RAL_041 RAL_042 RAL_043 RAL_044	RAL
GtGP - 10	Towage Operations	Does the organisation produce towage guidelines?	Satisfactory – A&BC, for Campbeltown Harbour, has issued Towage Guidelines. Observation – the towage guidelines are not published on the website and available for stakeholders. The Towage Guidelines have a section outlining Master/Pilot/Towage exchange considerations.	Recommend – towage guidelines are published for harbour users to ready and apply.	RAL_026	RAL
		Is there a process for approving towage providers? Are non-routine tows pre-approved / managed by the organisation?	Satisfactory – the Towage Guidelines state that: <i>“Towage companies are requested to supply the Harbour Master at Campbeltown with the appropriate Risk Assessments, Policies and Procedures relevant to their operations within Campbeltown Harbour Limits”</i> . This has been evidenced as in place for Clyde Marine Tugs operating in Campbeltown Harbour. Observation – there is no evidence that this has been carried out for Svitzer Marine or Serco tugs operating at Campbeltown Harbour. Observation – there are no specific procedures referenced in the Towage Guidelines to manage non-routine towage.	Recommend – the SHA upgrade the information in the Towage Guidelines from a request to a requirement and ensure that all third party towage operators comply with the procedure in place. Recommend – A&BC should review the Towage Guidelines and introduce a procedure to manage non-routine (dead and unusual structure) towage within its Statutory Harbours. There is always the possibility that a tow may occur either within, or through the Council’s harbour limits.	RAL_026 RAL_045 RAL_046 RAL_047 RAL_048 RAL_049 RAL_050	RAL

PMSC / GtGP Reference	Subject	Evidence Required For Compliance	Evidence of Compliance	Recommendations	Evidence Reference	Auditor
Cont. GtGP - 10	Cont. Towage Operations	Cont. Is there a process for approving towage providers? Are non-routine tows pre-approved / managed by the organisation?	Observation – the 'Navigation Safety, Pilotage and Towage Policy' states: "Currently there is no provision of towage services at any of the harbours for which Argyll and Bute Council are the Harbour Authority." Whilst there are no permanently stationed tugs in Campbeltown, ship towage does occur.	Recommend – the 'Navigation Safety, Pilotage and Towage Policy' is revised to recognise ship towage operations in Campbeltown. Additionally, non-routine towage should be included in the policy statement.	MJS_002	RAL
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 – a 'Permission to Dive Permit' for 30 March 2024 was evidenced.		MJS_043	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 – a 'Marine Department Hot Work Permit – Ship' for 27 May 2024 was evidenced.		MJS_045 MJS_046	MJS
GtGP – 6.7.3	Bunkering	Is there a process for managing Bunkering?	Satisfactory – the NATO jetty operates its own Oil Pollution Plan. Fishing vessels bunker by road tanker.		n/a	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 – for vessels using the harbour, checks are made as part of the booking process operated by LPS. Observation – A&BC does not have a formalised process for checking commercially operated Coded vessels.	Recommend – the Harbour Authority considers the requirements of the 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 operating within the Authority's area.	MJS_001	MJS

B Quayside Check

Visual observation of Campbeltown Harbour quays during the site visit on the 03 September 2024.

B.1 Quayside Check

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 Old Pier was clear of debris and obstructions. The New Pier had wood bark from cargo handling that was being cleared away, with the RoRo berth and linkspan clear and well maintained. Housekeeping on the quay was evident during the visit.		MJS
		Pedestrian/Disabled access for passengers or leisure users?	Satisfactory – walkways were clearly marked for pedestrians to access the ferry terminal; walkways were delineated from vehicle parking areas.		MJS
		Is the type and condition of quayside surface appropriate to the operation?	Satisfactory – the marina pontoons, quayside and pier surface accessible to the public (some areas were restricted) is appropriate to its intended 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 quayside had appropriately spaced LSE. The quay structures had water egress ladders. Observation – at the RoRo ferry terminal, one egress ladder was missing the cope level hand-grab bar. See Image B1.	Recommend – the replacement of the missing the cope level hand-grab bar.	MJS
		Is there appropriate LSE at quay edge?	Satisfactory – Life saving equipment (life rings) were installed at the pier, dockside and marina pontoons.		MJS
SIP 005	Bollards and securing equipment	Does the general condition of bollards appear to be in good order?	Satisfactory – the bollards along the New Quay were (visually) in good condition. The RNLI berthing area had been recently refitted, as had the marina. The Old Quay had a number of older bollards that were in need of painting. Observation – the Old Quay bollards had not been recently painted, were not numbered, or Safe Working Loads (SWL) identified. See Image B2.	Recommendation – bollards and bits are inspected, numbered and SWL added.	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 New Quay commercial quay is vertical rubber sections, the linkspan RoRo berth has piles and sprung fenders. The Old Quay has a mixed set of fendering dependant on vessel type.		MJS
		Is the condition of the fendering in good order?	Satisfactory – fitted fendering was observed to be in serviceable condition.		MJS
		Are chaffing plates used?	Satisfactory – wood sections are used on most sections of the Quays. Some sections are concrete, along the New Quay at the commercial berth. Observation – the wooden edge protection beams at the RoRo berth (see Image B3 and the Old Quay (See Image B4) have deteriorated.	Recommend – wooden edge beams along the Quay edges are reviewed, with repairs made or sections replaced as required.	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 all berths at the Quays and the pontoons (note, quayside checks carried out in daylight only).		MJS
ACOP 58-60	Layout	Is adequate separation delineated between quayside operations?	Satisfactory – there is adequate delineated between quayside operations with certain sections fenced off and usable to manage cruise passengers under International Ship and Port Facility (ISPS) requirements.		MJS
ACOP 82	Signage	Is appropriate signs and markings provided	Satisfactory – the harbour has adequate signage.		MJS



Image B1. Campbeltown, missing water egress ladder hand-grip



Image B2. Campbeltown, Old Quay bollard



Image B3. Campbeltown, New Quay wooden edge beams



Image B4. Campbeltown, Old Quay wooden edge beams

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