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MINISTRY OF PORTS, SHIPPING AND WATERWAYS
नौवहन महानिदेशालय, मुंबई MUMBAI
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DGS Circular No. 19 of 2025

Casualty Investigation Branch Circular No. 03 of 2025

Guidelines for the Safe Transfer of Seafarers, Pilots etc. using Pilot ladders, Gangways or Combination ladder etc. to / from a service boat or launch or a barge or crafts.

This safety circular is issued to highlight the two unfortunate incidents occurred in the recent past at Ulsan Anchorage (South Korea) and Port Said (Egypt) which resulted in the tragic loss of lives of the two Indian seafarers. This safety circular is to be read in conjunction with any existing safety circular issues by individual ports, terminals in addition to the SOLAS Regulation V/23 as amended on pilot transfer arrangements.

Personnel transfers using a passenger transfer basket, pilot ladder, gangway or combination ladder to/from a service launch or a barge are high risk operations and compliance with safe work procedures are of paramount importance to avoid fatal consequences, loss of lives, damages etc.

A. Incident Description

- 1. Incident No. 1:** On 24th May 2024, at Ulsan Anchorage, one of the seafarers signing-off from a Singapore flagged vessel prepared to disembark through the starboard combination ladder. While the seafarer descended through the ladder and reached the pilot ladder, the service boat attempted to come alongside, but rough seas and heavy swells hindered proper alignment with the pilot ladder. Despite these conditions, the transfer continued. While attempting to disembark into the service boat, the seafarer lost his grip on the pilot ladder and fell into the sea. Though the seafarer could initially grab a lifebuoy and rope deployed by the crew, panic and exhaustion caused him to lose his hold and was swept away by the strong current.

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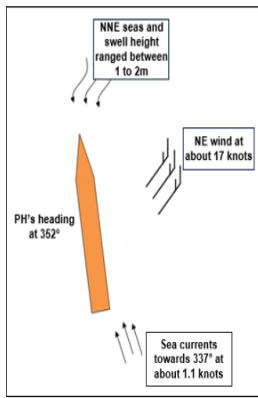


Figure 1: Illustration of the weather and sea conditions relative to PH at 0800 Hrs.
(Source: TSIB report)

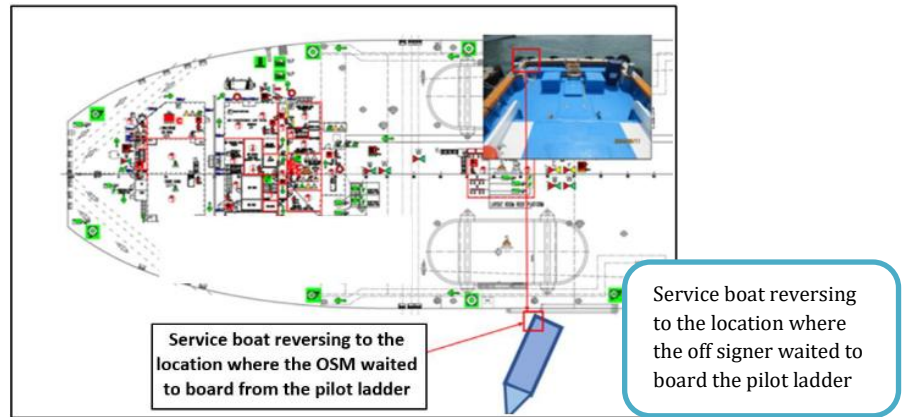


Figure 2: Indicating the service boat angle of approach. Source: TSIB report

The service boat was unable to rescue him due to the rough seas. He was later recovered by the Korea Coast Guard in an unconscious state and taken to the hospital, where he was declared dead upon arrival.

2. **Incident No. 2:** On 15th February 2025, at Port Said (Egypt), a seafarer disembarking from a Gabon flagged vessel onto a service boat via a combination ladder lost his balance when the boat suddenly swung away from the ship's side due to sea movements and fell into the water. Despite rescue efforts, including throwing lifebuoys, lowering the gangway, and deploying a lifeboat, the seafarer was unable to secure any assistance. He drifted toward the aft of the vessel and eventually disappeared from sight. The service boat, which had been tracking him, later reported losing contact, leading to a tragic outcome.

B. Cause Analysis

Both incidents revealed significant lapses in adhering to critical safety procedures during the disembarkation process, resulting in seafarers falling into the sea.

In the first case, the prevailing sea conditions were not properly assessed. The rough seas led to a misalignment between the pilot ladder and the service boat, creating a highly unsafe environment for personnel transfer. Despite the visible risk posed by strong swells, the operation continued without implementing any safety interventions. The disembarking seafarer, who was not wearing appropriate PPE, lost his grip and fell into the water.

In the second incident, similar rough sea and swell conditions caused the service boat to swing away at a critical moment during the transfer operation. This sudden movement disrupted the seafarer's balance, resulting in fall into the sea. In both cases, poor coordination and lack of preventive action in response to adverse sea conditions played a direct role in the accidents.

These incidents highlight the dangers associated with unstable sea states and several systemic safety failures, including inadequate risk assessment, insufficient awareness of environmental

conditions, failure to follow established safety protocols, and improper use of PPE. They emphasize the urgent need for stronger safety measures, including proactive planning, better coordination between ship and service boat crews, and comprehensive training tailored to transfer operations in varying sea conditions.

It is equally important that service boat operators remain fully aware of and responsive to sea conditions during such operations. The first incident occurred in daylight, while the second took place at dawn, drawing attention to the additional risk posed by poor visibility. In such cases, proper illumination of the pilot ladder is critical to ensuring safe disembarkation.

C. Lessons Learned:

1. **Safe Work Procedures:** Always comply with the company's safe transfer procedures and risk assessment for embarking and disembarking personnel via service boat/barge.
2. **Equipment Rigging and Maintenance:** Ensure that the means of embarkation/ disembarkation are properly rigged and maintained as per regulatory requirements, manufacturer's instructions and company procedures. Maximum age of the pilot ladder should be 24 Months, maximum age of the man ropes used with Pilot ladder 12 months. If the condition of the Pilot Ladder or Man Ropes are not good, it must be replaced immediately.

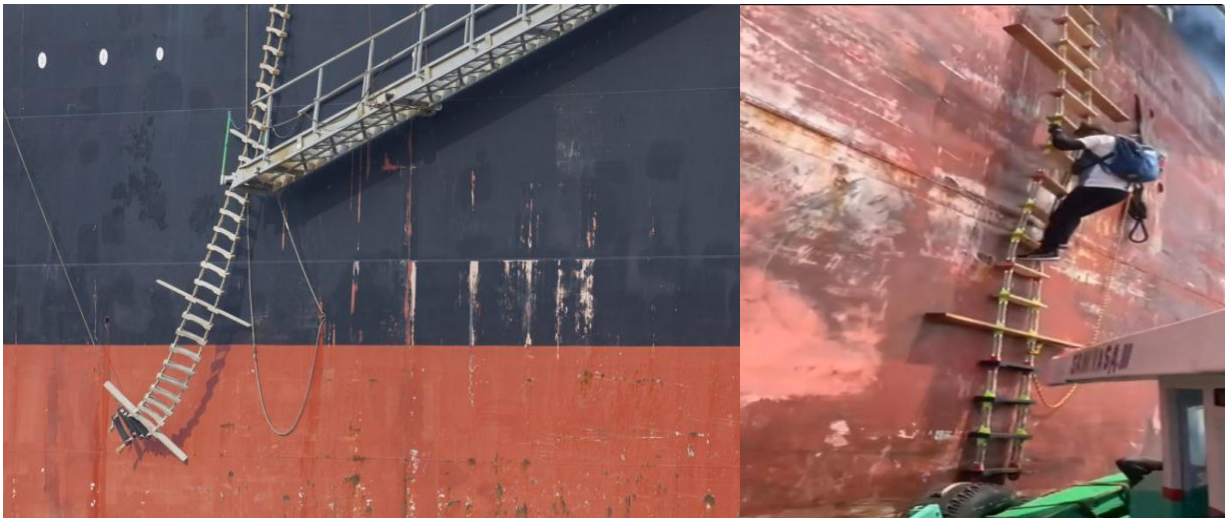


Figure 3: Illustration of a seafarer disembarking from a vessel through a pilot ladder with inadequate PPE

3. **Time Pressure:** Avoid scheduling crew changes within tight operational timelines like ETA deadline, where there is an inherent urgency exists to complete the transfer operation quickly, compelling to cut corners.
4. **Weather Conditions:** Evaluate the adverse effects of existing weather and forecasted weather conditions, with particular attention to factors such as wind speed, swell height, and sea state, which may significantly impact safe transfer operation. While in doubt, be on the safety zone and

postpone transfers during adverse weather conditions. If required, move the operations in sheltered areas or provide an adequate lee to facilitate safe transfer.

5. Human Element: Consider the physical fitness, experience and confidence of the person embarking / disembarking especially those disembarking soon after completion of long work hours on board. Familiarization and toolbox meeting: Carry out a toolbox meeting with all relevant crew explaining the hazards, safeguards, means of communication etc.
6. Personal Protective Equipment (PPE): Transfer personnel must wear life jackets and should not carry backpacks or baggage during the transfer. Transfer the baggage or other items using a heaving line. Both the victims were not wearing life jackets at the time of incident. Life jacket could have kept the victim afloat even after falling in water which could have helped in rescue.
7. Operational Safety: Always inspect ladders and equipment to ensure they are not stained with oil, grease. This inspection to be done prior to rigging. Assign experienced person to supervise the operations and ensure clear communication between ship and service launch. During the transfers, always maintain 3-point contact and keep the body weight near to the ladder to prevent it from swinging. When transferring between a pilot ladder or a gangway and boat, it is crucial to always use the available handholds on the vessel /boat to maintain stability and prevent falls, especially when crossing over between the two platforms; make sure to firm grip the handholds before stepping onto or off the ladder. It is crucial to stay alert to your surroundings. Listen to the instructions for launch personnel as they will instruct when it is safe to transfer. Adequate lighting of the transfer area is also very important.
8. Safety Culture and Stop Work Policy: Implement company's safety stop work policy when unsafe acts or conditions are noticed, ensuring immediate attention to hazardous conditions.
9. Emergency Preparedness: Crew must be familiar with the operations and aware of required emergency actions in event of man overboard (MOB) event by way of regular drills, including raising of alarm, reporting procedures and rescue measures.
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D. Safety Recommendations

1. Industry to take Note of Gaps in Compliance

Compliance with dock safety regulations lies with the respective port authorities and designated safety officers. Pilot transfer procedures—whether involving a pilot boat, tug, barge, or service launch—are critical to maintaining uninterrupted vessel operations, as berthing and un-berthing depend on the safe movement of pilots. Ports must recognize the importance of ensuring that pilot

transfer crews are fully aware of and committed to safe operating practices. All passenger and pilot transfers should be conducted with safety as the primary concern and only in calm weather conditions. Port safety officers must verify that all craft crew are properly briefed, trained, and experienced for such operations. The Code of Safe Working Practices may be used as a guiding reference for compliance. Service launch operators should regularly review their procedures to include adequate handholds for safe transfers, availability of life jackets for all personnel, effective communication devices, and reliable survivor recovery arrangements. It is hereby emphasized that any attempt by the Ship Owners/ Ship Managers/ RPSL Agencies/ Port Authorities/ Ship Masters/ Pilots/ Seafarers to carry out passenger and pilot transfer operations in unfavorable weather conditions without proper safe guards will be considered as a serious violation of safety requirements and necessary penal action shall be initiated against the persons involved in accordance with the provisions of the Merchant Shipping Act.

2. Vessel owners, Technical Managers and RPSL agencies:

Ship owners, managers and RPSL agencies to review the company's safe transfer procedures and risk assessment for embarking and disembarking personnel via pilot ladder, combination ladders, and while using services of boat/tug/barge based on the above learnings. Vessel owners and tech managers shall ensure SOLAS Chapter V, Regulation 23¹ are complied with.

GPS-enabled Personal Locator Beacons (PLBs): In the interest of enhancing personnel safety during transfers to and from ships, it is strongly recommended that all pilots and transferring seafarers be equipped with GPS-enabled PLBs. These devices serve as vital emergency tracking tools that can significantly expedite search and rescue efforts in the event of a fall overboard or any other incident during transfer operations. The real-time location capability of GPS PLBs ensures immediate identification of the distressed individual's position, improving survival chances and response efficiency. Incorporating this equipment into standard transfer protocols reflects a proactive safety culture and aligns with international best practices for safeguarding maritime personnel.

3. Ship Masters

Master should carry out regular safety drills to familiarize crew in stopping the operations, responding to an emergency while passenger or pilot transfer is in progress. Compliance with SMS procedure and other company guidelines and contents of this circular is to be discussed and followed.

¹ Regulation 23 - Pilot transfer arrangements

Avoid holding personnel on board till the departure of vessel and disembarking into a boat prior departure creates a sense of urgency among personnel to get down into boat “come what may”. This kind of attitude is a clear recipe for dangerous incidents.

Fresh risk assessment is to be carried out if there are any changes in conditions prevailing at the time of planning of operation. inculcate habit of use of wearing PPE during transfer whether for going ashore or signing off from a vessel

Three-Point Contact Rule: Maintaining three points of contact (e.g., two hands and one foot or two feet and one hand) when using ladders or handholds is a globally recognized safety practice to minimize accidents during transitions

Man Overboard (MOB) Training: Always keep in mind Pilot Transfer, Passenger Transfer poses a potential threat of man Overboard situation, therefore emergency preparedness plays a pivotal role in saving lives. Crews must be trained in quick rescue actions which can dramatically improve chances of survival in such events.



(Capt. Harinder Singh)
Nautical Surveyor and Dy. Director General of Shipping (Tech.)

To,
All stakeholders through the DGS Website
Ship Owner / Ship Operators / Ship Manager / Ship Masters