

# CỤC ĐĂNG KIẾM VIỆT NAM VIETNAM REGISTER

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# THÔNG BÁO KỸ THUẬT TÀU BIỂN TECHNICAL INFORMATION ON SEA-GOING SHIPS

# Ngày 30 tháng 8 năm 2016 Số thông báo: 027TI/16TB

Nội dung: Bố trí cho hoa tiêu lên, rời tàu theo quy định của Công ước quốc tế về an toàn sinh mạng con người trên biển năm 1974(SOLAS 74).

Kính gửi: Các chủ tàu/ công ty quản lý tàu biển Các đơn vị đăng kiểm tàu biển

Như chúng tôi đã thông báo đến các Quý Đơn vị tại Thông báo kỹ thuật tàu biển số 026TI/16TB ngày 16/8/2016, Tổ chức các quốc gia tham gia Bản ghi nhớ Riyadh về hợp tác trong kiểm tra tàu biển của Chính quyền cảng vùng Vịnh (Riyadh-MOU), bao gồm 6 quốc gia: Bahrain, Kuwait, Oman, Qatar, Saudi Arabia, UAE, đã ra thông báo về việc các Chính quyền cảng thành viên của Tổ chức sẽ thực hiện Chiến dịch kiểm tra tập trung, từ ngày 01/9/2016 đến 30/11/2016, về bố trí cho hoa tiêu lên, rời tàu (the Concentrated Inspection Campain on Pilot Transfer Arrangements) đối với tàu biển nước ngoài đến cảng của các thành viên.

Liên quan đến bố trí cho hoa tiêu lên, rời tàu, đề nghị các Quý Đơn vị lưu ý việc áp dụng quy định của Công ước quốc tế về an toàn sinh mạng con người trên biển năm 1974 (SOLAS 74) tùy thuộc vào ngày đóng tàu (ngày đặt sống chính như sau):

1. Tàu được đóng trước ngày 01/01/1994, áp dụng Quy định V/17 của Công ước SOLAS 74 nguyên bản (xem Phụ lục 1 đính kèm).

2. Tàu được đóng từ ngày 01/01/1994 đến trước ngày 01/7/2012, áp dụng Quy định V/17 (hoặc V/23 từ ngày 01/7/2002) của Công ước SOLAS 74 được sửa đổi, bổ sung bởi Nghị quyết MSC.22(59) (xem Phụ lục 2 đính kèm).

3. Tàu được đóng từ ngày 01/7/2012, áp dụng Quy định V/17 của Công ước SOLAS 74 được sửa đổi, bổ sung bởi Nghị quyết MSC.308(88) (xem Phụ lục 3 đính kèm).

Tại Khóa họp thứ 29 (tháng 12/2015), Đại hội đồng của Tổ chức Hàng hải quốc tế (IMO) đã thông qua Nghị quyết A.1108(29) về sửa đổi, bổ sung khuyến nghị đối với bố trí cho hoa tiêu lên, rời tàu theo Nghị quyết A.1045(27) (xem phần đính kèm).

Nghị quyết A.1045(27) được đính kèm Thông báo kỹ thuật tàu biển số 026TI/16TB ngày 16/8/2016.

Cục Đăng kiểm Việt Nam xin thông báo để các Quý Đơn vị lưu ý áp dụng theo đúng quy định.

Thông báo kỹ thuật này được nêu trong mục: *Thông báo của VR/ Thông báo kỹ thuật TB* của trang tin điện tử của Cục Đăng kiểm Việt Nam: <u>http://www.vr.org.vn</u>.

Nếu Quý Đơn vị cần thêm thông tin về vấn đề nêu trên, đề nghị vui lòng liên hệ:

Cục Đăng kiểm Việt Nam Phòng Tàu biển Địa chỉ: 18 Phạm Hùng, Phường Mỹ Đình 2, Quận Nam Từ Liêm, Hà Nội Điện thoại: +84 4 37684701 (số máy lẻ: 521) Fax: +84 4 37684722 Thư điện tử: <u>taubien@vr.org.vn</u>; <u>bangph@vr.org.vn</u> Xin gửi đến các Quý Đơn vi lời chào trân trong./.

# Noi nhận:

- Như trên;

- Phòng QP, TB, CN, HTQT;

Các chi cục đăng kiểm;
Lưu TB./.

- Trung tâm VRQC, TH;

Tài liệu gửi kèm:

- Phụ lục 1, 2, 3
- Nghị quyết A.1108(29) "Sửa đổi, bổ sung khuyến nghị đối với bố trí cho hoa tiêu lên, rời tàu (Nghị quyết A.1045(27))"

# PHŲ LỤC 1:

# QUY ĐỊNH VỀ BỐ TRÍ CHO HOA TIÊU LÊN, XUỐNG TÀU THEO SOLAS 74 NGUYÊN BẢN (Quy định V/17)

# (Áp dụng cho tàu được đóng trước ngày 01/01/1994)

#### **Regulation 17-** Pilot Ladders and Mechanical Pilot Hoists

Ships engaged on voyages in the course of which pilots are likely to be employed shall comply with the following requirements:

(a) Pilot ladders

(i) The ladder shall be efficient for the purpose of enabling pilots to embark and disembark safely, kept clean and in good order and may be used by officials and other persons while a ship is arriving at or leaving a port.

(ii) The ladder shall be secured in a position so that it is clear from any possible discharges from the ship, that each step rests firmly against the ship's side, that it is clear so far as is practicable of the finer lines of the ship and that the pilot can gain safe and convenient access to the ship after climbing not less than 1.5 metres (5 feet) and not more than 9 metres (30 feet). A single length of ladder shall be used capable of reaching the water from the point of access to the ship; in providing for this due allowance shall be made for all conditions of loading and trim of the ship and for an adverse list of 15 degrees. Whenever the distance from sea level to the point of access to the ship is more than 9 metres (30 feet), access from the pilot ladder to the ship shall be by means of an accommodation ladder or other equally safe and convenient means.

(iii) The steps of the pilot ladder shall be:

(1) of hardwood, or other material of equivalent properties, made in one piece free of knots, having an efficient non-slip surface; the four lowest steps may be made of rubber of sufficient strength and stiffness or of other suitable material of equivalent characteristics;

(2) not less than 480 millimetres (19 inches) long, 115 millimetres (41/2 inches) wide, and 25 millimetres (1 inch) in depth, excluding any non-slip device;

(3) equally spaced not less than 300 millimetres (12 inches) nor more than 380 millimetres (15 inches) apart and be secured in such a manner that they will remain horizontal.

(iv) No pilot ladder shall have more than two replacement steps which are secured in position by a method different from that used in the original construction of the ladder and any steps so secured shall be replaced as soon as reasonably practicable by steps secured in position by the method used in the original construction of the ladder. When any replacement step is secured to the side ropes of the ladder by means of grooves in the sides of the step, such grooves shall be in the longer sides of the step.

(v) The side ropes of the ladder shall consist of two uncovered manila ropes not less than 60 millimetres (21/4 inches) in circumference on each side. Each rope shall be continuous with no joints below the top step. Two man-ropes properly secured to the ship and not less than 65 millimetres (21/2 inches) in circumference and a safety line shall be kept at hand ready for use if required.

(vi) Battens made of hardwood, or other material of equivalent properties, in one piece and not less than 1.80 metres (5 feet 10 inches) long shall be provided at such intervals as will prevent the pilot ladder from twisting. The lowest batten shall be on the fifth step from the bottom of the ladder and the interval between any batten and the next shall not exceed 9 steps.

(vii) Means shall be provided to ensure safe and convenient passage on to or into and off the ship between the head of the pilot ladder or of any accommodation ladder or other appliance provided. Where such passage is by means of a gateway in the rails or bulwark, adequate handholds shall be provided. Where such passage is by means of a bulwark ladder, such ladder shall be securely attached to the bulwark rail or platform and two handhold stanchions shall be fitted at the point of boarding or leaving the ship not less than 0.70 metre (2 feet 3 inches) nor more than 0.80 metre (2 feet 7 inches) apart. Each stanchion shall be rigidly secured to the ship's structure at or near its base and also at a higher point, shall be not less than 40 millimetres (11/2 inches) in diameter and shall extend not less than 1.20 metres (3 feet 11 inches) above the top of the bulwark.

(viii) Lighting shall be provided at night such that both the pilot ladder overside and also the position where the pilot boards the ship shall be adequately lit. A lifebuoy equipped with a self-igniting light shall be kept at hand ready for use. A heaving line shall be kept at hand ready for use if required.

(ix) Means shall be provided to enable the pilot ladder to be used on either side of the ship.

(x) The rigging of the ladder and the embarkation and disembarkation of a pilot shall be supervised by a responsible officer of the ship.

(xi) Where on any ship constructional features such as rubbing bands would prevent the implementation of any of these provisions, special arrangements shall be made to the satisfaction of the Administration to ensure that persons are able to embark and disembark safely.

# (b) Mechanical pilot hoists

(i) A mechanical pilot hoist, if provided, and its ancillary equipment shall be of a type approved by the Administration. It shall be of such design and construction as to ensure that the pilot can be embarked and disembarked in a safe manner including a safe access from the hoist to the deck and *vice versa*.

(ii) A pilot ladder complying with the provisions of paragraph (a) of this Regulation shall be kept on deck adjacent to the hoist and available for immediate use.

# PHŲ LŲC 2:

# QUY ĐỊNH VỀ BỐ TRÍ CHO HOA TIÊU LÊN, XUỐNG TÀU THEO SOLAS 74 ĐƯỢC SỬA ĐỔI, BỔ SUNG BỞI NGHỊ QUYẾT MSC.22(59) (Quy định V/17 hoặc V/23)

# (Áp dụng cho tàu được đóng từ ngày 01/01/1994 đến trước ngày 01/07/2012)

# Regulation 17 - Pilot transfer arrangements

(Quy định này được đánh số lại là Regulation 23 theo Nghị quyết MSC.99(73) có hiệu lực từ ngày 01/7/2002)

# **1** Application

*1.1.* Ships engaged on voyages in the course of which pilots are likely to be employed shall be provided with pilot transfer arrangements.

*1.2.* Equipment and arrangements for pilot transfer which are installed on or after 1 January 1994 shall comply with the requirements of this regulation, and due regard shall be paid to the standards adopted by the Organization<sup>1</sup>.

*1.3.* Equipment and arrangements for pilot transfer which are provided on ships before 1 January 1994 shall at least comply with the requirements of regulation 17 of the International Convention for the Safety of Life at Sea, 1974 in force prior to that date, and due regard shall be paid to the standards adopted by the Organization prior to that date.

*1.4.* Equipment and arrangements which are replaced after 1 January 1994 shall, in so far as is reasonable and practicable, comply with the requirements of this regulation.

#### 2 General

2.1. All arrangements used for pilot transfer shall efficiently fulfill their purpose of enabling pilots to embark and disembark safely. The appliances shall be kept clean, properly maintained and stowed and shall be regularly inspected to ensure that they are safe to use. They shall be used solely for the embarkation and disembarkation of personnel.

2.2. The rigging of the pilot transfer arrangements and the embarkation of a pilot shall be supervised by a responsible officer having means of communication with the navigation bridge who shall also arrange for the escort of the pilot by a safe route to and from the navigation bridge. Personnel engaged in rigging and operating any mechanical equipment shall be instructed in the safe procedures to be adopted and the equipment shall be tested prior to use.

#### **3** Transfer arrangements

3.1. Arrangements shall be provided to enable the pilot to embark and disembark safely on either side of the ship.

3.2. In all ships where the distance from sea level to the point of access to, or egress from, the ship exceeds 9 m, and when it is intended to embark and disembark pilots by means of the accommodation ladder, or by means of mechanical pilot hoists or other equally safe and convenient means in conjunction with a pilot ladder, the ship shall carry such equipment on each side, unless the equipment is capable of being transferred for use on either side.

3.3. Safe and convenient access to, and egress from, the ship shall be provided by either:

.1. a pilot ladder requiring a climb of not less than 1.5 m and not more than 9 m above the surface of the water so positioned and secured that:

.1.1. it is clear of any possible discharges from the ship;

.1.2. it is within the parallel body length of the ship and, as far as is practicable, within the midship half length of the ship; .1.3. each step rests firmly against the ship's side; where constructional features, such as rubbing bands, would prevent the implementation of this provision, special arrangements shall, to the satisfaction of the Administration, be made to ensure that persons are able to embark and disembark safely;

.1.4. the single length of pilot ladder is capable of reaching the water from the point of access to, or egress from, the ship and due allowance is made for all conditions of loading and trim of the ship, and for an adverse list of  $15^{\circ}$ ; the securing strong point, shackles and securing ropes shall be at least as strong as the side ropes;

.2. an accommodation ladder in conjunction with the pilot ladder, or other equally safe and convenient means, whenever the distance from the surface of the water to the point of access to the ship is more than 9 m. The accommodation ladder shall be sited leading aft. When in use, the lower end of the accommodation ladder shall rest firmly against the ship's side within the parallel body length of the ship and, as far as is practicable, within the mid-ship half length and clear of all discharges; or

.3. a mechanical pilot hoist so located that it is within the parallel body length of the ship and, as far as is practicable, within the mid-ship half length of the ship and clear of all discharges.

# 4 Access to the ship's deck

Means shall be provided to ensure safe, convenient and unobstructed passage for any person embarking on, or disembarking from, the ship between the head of the pilot ladder, or of any accommodation ladder or other appliance, and the ship's deck. Where such passage is by means of:

.1. a gateway in the rails or bulwark, adequate handholds shall be provided;

.2. a bulwark ladder, two handhold stanchions rigidly secured to the ship's structure at or near their bases and at higher points shall be fitted. The bulwark ladder shall be securely attached to the ship to prevent overturning.

# **5** Shipside doors

Shipside doors used for pilot transfer shall not open outwards.

# 6 Mechanical pilot hoists

6.1. The mechanical pilot hoist and its ancillary equipment shall be of a type approved by the Administration. The pilot hoist shall be designed to operate as a moving ladder to lift and lower one person on the side of the ship, or as a platform to lift and lower one or more persons on the side of the ship. It shall be of such design and construction as to ensure that the pilot can be embarked and disembarked in a safe manner, including a safe access from the hoist to the deck and vice versa. Such access shall be gained directly by a platform securely guarded by handrails.

6.2. Efficient hand gear shall be provided to lower or recover the person or persons carried, and kept ready for use in the event of power failure.

6.3. The hoist shall be securely attached to the structure of the ship. Attachment shall not be solely by means of the ship's side rails. Proper and strong attachment points shall be provided for hoists of the portable type on each side of the ship.

6.4. If belting is fitted in the way of the hoist position, such belting shall be cut back sufficiently to allow the hoist to operate against the ship's side.

6.5. A pilot ladder shall be rigged adjacent to the hoist and available for immediate use so that access to it is available from the hoist at any point of its travel. The pilot ladder shall be capable of reaching the sea level from its own point of access to the ship.

6.6. The position on the ship's side where the hoist will be lowered shall be indicated.

6.7. An adequate protected stowage position shall be provided for the portable hoist. In very cold weather, to avoid the danger of ice formation, the portable hoist shall not be rigged until its use is imminent.

# 7 Associated equipment

7.1. The following associated equipment shall be kept at hand ready for immediate use when persons are being transferred;

.1. two man-ropes of not less than 28 mm in diameter properly secured to the ship if required by the pilot;

.2. a lifebuoy equipped with a self-igniting light;

.3. a heaving line.

7.2. When required by paragraph 4, stanchions and bulwark ladders shall be provided.

# 8 Lighting

Adequate lighting shall be provided to illuminate the transfer arrangements overside, the position on deck where a person embarks or disembarks and the controls of the mechanical pilot hoist.

<sup>1</sup> Refer to the Recommendation on pilot transfer arrangements adopted by the Organization by resolution A.889(21) and to MSC/Circ.568/Rev.1, Required boarding arrangement for pilots.

# PHŲ LỤC 3:

# QUY ĐỊNH VỀ BỐ TRÍ CHO HOA TIÊU LÊN, XUỐNG TÀU THEO SOLAS 74 ĐƯỢC SỬA ĐỔI, BỔ SUNG BỞI NGHỊ QUYẾT MSC.308(88) (Quy định V/23)

(Áp dụng cho tàu được đóng từ ngày 01/07/2012)

## **Regulation 23 - Pilot transfer arrangements**

# **1** Application

1.1 Ships engaged on voyages in the course of which pilots may be employed shall be provided with pilot transfer arrangements.

1.2 Equipment and arrangements for pilot transfer which are installed1 on or after 1 July 2012 shall comply with the requirements of this regulation, and due regard shall be paid to the standards adopted by the Organization2.

1.3 Except as provided otherwise, equipment and arrangements for pilot transfer which are provided on ships before 1 July 2012 shall at least comply with the requirements of regulation  $17^3$  or 23, as applicable, of the International Convention for the Safety of Life at Sea, 1974, in force prior to that date, and due regard shall be paid to the standards adopted by the Organization prior to that date.

1.4 Equipment and arrangements installed on or after 1 July 2012, which are a replacement of equipment and arrangements provided on ships before 1 July 2012, shall, in so far as is reasonable and practicable, comply with the requirements of this regulation.

1.5 With respect to ships constructed before 1 January 1994, paragraph 5 shall apply not later than the first survey<sup>4</sup> on or after 1 July 2012.

1.6 Paragraph 6 applies to all ships.

# 2 General

2.1 All arrangements used for pilot transfer shall efficiently fulfil their purpose of enabling pilots to embark and disembark safely. The appliances shall be kept clean, properly maintained and stowed and shall be regularly inspected to ensure that they are safe to use. They shall be used solely for the embarkation and disembarkation of personnel.

2.2 The rigging of the pilot transfer arrangements and the embarkation of a pilot shall be supervised by a responsible officer having means of communication with the navigation bridge and who shall also arrange for the escort of the pilot by a safe route to and from the navigation bridge. Personnel engaged in rigging and operating any mechanical equipment shall be instructed in the safe procedures to be adopted and the equipment shall be tested prior to use.

2.3 A pilot ladder shall be certified by the manufacturer as complying with this regulation or with an international standard acceptable to the Organization<sup>5</sup>. Ladders shall be inspected in accordance with regulations I/6, 7 and 8.

2.4 All pilot ladders used for pilot transfer shall be clearly identified with tags or other permanent marking so as to enable identification of each appliance for the purposes of survey, inspection and record keeping. A record shall be kept on the ship as to the date the identified ladder is placed into service and any repairs effected.

2.5 Reference in this regulation to an accommodation ladder includes a sloping ladder used as part of the pilot transfer arrangements.

# **3** Transfer arrangements

3.1 Arrangements shall be provided to enable the pilot to embark and disembark safely on either side of the ship.

3.2 In all ships, where the distance from sea level to the point of access to, or egress from, the ship exceeds 9 m, and when it is intended to embark and disembark pilots by means of the accommodation ladder<sup>6</sup>, or other equally safe and convenient means in conjunction with a pilot ladder, the ship shall carry such equipment on each side, unless the equipment is capable of being transferred for use on either side.

3.3 Safe and convenient access to, and egress from, the ship shall be provided by either:

.1 a pilot ladder requiring a climb of not less than 1.5 m and not more than 9 m above the surface of the water so positioned and secured that:

- .1 it is clear of any possible discharges from the ship;
- .2 it is within the parallel body length of the ship and, as far as is practicable, within the midship half length of the ship;
- .3 each step rests firmly against the ship's side; where constructional features, such as rubbing bands, would prevent the implementation of this provision, special arrangements shall, to the satisfaction of the Administration, be made to ensure that persons are able to embark and disembark safely;
- .4 the single length of pilot ladder is capable of reaching the water from the point of access to, or egress from, the ship and due allowance is made for all conditions of loading and trim of the ship, and for an adverse list of 15°; the securing strong point, shackles and securing ropes shall be at least as strong as the side ropes; or

.2 an accommodation ladder in conjunction with the pilot ladder (i.e. a combination arrangement), or other equally safe and convenient means, whenever the distance from the surface of the water to the point of access to the ship is more than 9 m. The accommodation ladder shall be sited leading aft. When in use, means shall be provided to secure the lower platform of the accommodation ladder and the lower platform are held firmly against the ship's side within the parallel body length of the ship and, as far as is practicable, within the mid-ship half length and clear of all discharges.

.1 when a combination arrangement is used for pilot access, means shall be provided to secure the pilot ladder and manropes to the ship's side at a point of nominally 1.5 m above the bottom platform of the accommodation ladder. In the case of a combination arrangement using an accommodation ladder with a trapdoor in the bottom platform (i.e. embarkation platform), the pilot ladder and man ropes shall be rigged through the trapdoor extending above the platform to the height of the handrail.

# 4 Access to the ship's deck

Means shall be provided to ensure safe, convenient and unobstructed passage for any person embarking on, or disembarking from, the ship between the head of the pilot ladder, or of any accommodation ladder or other appliance, and the ship's deck. Where such passage is by means of:

.1 a gateway in the rails or bulwark, adequate handholds shall be provided;

.2 a bulwark ladder, two handhold stanchions rigidly secured to the ship's structure at or near their bases and at higher points shall be fitted. The bulwark ladder shall be securely attached to the ship to prevent overturning.

# **5** Shipside doors

Shipside doors used for pilot transfer shall not open outwards.

# 6 Mechanical pilot hoists

Mechanical pilot hoists shall not be used.

# 7 Associated equipment

7.1 The following associated equipment shall be kept at hand ready for immediate use when persons are being transferred:

.1 two man-ropes of not less than 28 mm and not more than 32 mm in diameter properly secured to the ship if required by the pilot; man-ropes shall be fixed at the rope end to the ring plate fixed on deck and shall be ready for use when the pilot disembarks, or upon request from a pilot approaching to board (the manropes shall reach the height of the stanchions or bulwarks at the point of access to the deck before terminating at the ring plate on deck);

.2 a lifebuoy equipped with a self-igniting light;

.3 a heaving line.

7.2 When required by paragraph 4 above, stanchions and bulwark ladders shall be provided.

# 8 Lighting

Adequate lighting shall be provided to illuminate the transfer arrangements overside and the position on deck where a person embarks or disembarks."

- 4 Refer to the Unified interpretation of the term "first survey" referred to in SOLAS regulations (MSC.1/Circ.1290).
- 5 Refer to the recommendations by the International Organization for Standardization, in particular publication ISO 799:2004, *Ships and marine technology Pilot ladders*.
- 6 Refer to regulation II-1/3-9 on Means of embarkation on and disembarkation from ships, adopted by resolution MSC.256(84), together with the associated Guidelines (MSC.1/Circ.1331).

<sup>1</sup> Refer to the Unified interpretation of SOLAS regulation V/23 (MSC.1/Circ.1375).

<sup>2</sup> Refer to the Assembly resolution on Pilot transfer arrangements, to be adopted by the Organization.

<sup>3</sup> Refer to resolution MSC.99(73), renumbering previous regulation 17 as regulation 23, which entered into force on 1 July 2002.



ASSEMBLY 29th session Agenda item 10 A 29/Res.1108 14 December 2015 Original: ENGLISH

# Resolution A.1108(29)

# Adopted on 2 December 2015 (Agenda item 10)

# AMENDMENTS TO THE RECOMMENDATION ON PILOT TRANSFER ARRANGEMENTS (RESOLUTION A.1045(27))

THE ASSEMBLY,

RECALLING Article 15(j) of the Convention on the International Maritime Organization regarding the functions of the Assembly in relation to regulations and guidelines concerning maritime safety,

RECALLING ALSO the provisions of regulation V/23 of the International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended,

RECALLING FURTHER resolution A.1045(27) by which it adopted the *Recommendation on pilot transfer arrangements*,

HAVING CONSIDERED the recommendation made by the Maritime Safety Committee at its ninety-fifth session,

1 ADOPTS the amendments to the *Recommendation on pilot transfer arrangements* (resolution A.1045(27)), set out in the annex to the present resolution;

2 INVITES Governments to draw the attention of all concerned to these amendments to the Recommendation;

3 REQUESTS Governments to ensure that pilot ladders and their arrangements, use and maintenance conform to standards not inferior to those set out in the annex to resolution A.1045(27), as amended by the present resolution.



#### Annex

## AMENDMENTS TO THE RECOMMENDATION ON PILOT TRANSFER ARRANGEMENTS (RESOLUTION A.1045(27))

# 5 ACCESS TO DECK

The existing paragraphs 5.1 and 5.2 are amended to read as follows:

- ".1 a gateway in the rails or bulwark, adequate handholds should be provided at the point of embarking on or disembarking from the ship on each side which should be not less than 0.7 m or more than 0.8 m apart. Each handhold should be rigidly secured to the ship's structure at or near its base and also at a higher point, should be not less than 32 mm in diameter and should extend not less than 1.2 m above the deck to which it is fitted; and
- .2 a bulwark ladder, two separate handhold stanchions should be fitted at the point of embarking on or disembarking from the ship on each side which should be not less than 0.7 m or more than 0.8 m apart. The bulwark ladder should be securely attached to the ship to prevent overturning. Each stanchion should be rigidly secured to the ship's structure at or near its base and also at a higher point, should be not less than 32 mm in diameter and should extend not less than 1.2 m above the top of the bulwarks. Stanchions or handrails should not be attached to the bulwark ladder."