



Regs4ships

Port Marine Safety Code

River Hamble Harbour : March 2014

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1 Executive Summary

The River Hamble Harbour Authority remains compliant with the Port Marine Safety Code subject to this report.

There is 1 non-conformity outstanding regarding access to the fishermen's jetty, but we are satisfied that the close out is being effectively managed especially given the effect the recent storms have had on the design criteria of the bridge to the pontoon.

There is one observation outstanding regarding holding a multi-agency major emergency drill. This has moved right into 2014 as there was a multi-agency oil spill drill in 2013.

We have made 4 recommendations:

1.1 Recommendation 1/14

The report of the Oil Spill Exercise should be filed with the Oil Spill Response Plan.

1.2 Recommendation 2/14

When a drill is held a formal record should be generated including "lessons learned".

1.3 Recommendation 3/14

The Oil Spill Contingency Plan contains a safe refuelling procedure and this should be incorporated into a SOP within the SMS.

1.4 Recommendation 4/14

The management of dry side risks and the involvement of the Health and Safety experts at HCC should be revisited and reviewed especially the risks associated with the workshop, chainsaw and grinding etc.

2 Background

The Port Marine Safety Code requires that the Designated Person audits the Harbour Authority's compliance with the Code and provides independent assurance to the duty holder. The main responsibility of the DP is to determine, through assessment and audit, the effectiveness of the marine SMS in ensuring compliance with the Code.

We report accordingly and ask that this report be presented to the Board at the next Board meeting.

We enclose a Certificate of Compliance confirming compliance with the Code subject to the contents of this report. This should be filed in the appropriate section of the SMS.

3 Close out of non-conformity and observations from previous audit

3.1 Non –conformity Fishermen’s jetty 1/13

In the light of the recent risk assessment that found that the access to the jetty needed improvement and that the risks associated with its use was not ALARP and coupled with the observations made in this report, the use and access to of the Fishermen’s Jetty needs review. Close out required within 6 months.

This non-conformity is outstanding.

The necessary plans have been approved and all the required consents have been granted. The extra-ordinary weather of the past few months has included repeat ferocious storms and very high tides coupled with surges. If the planned bridge had been built it would almost certainly have been destroyed. Accordingly, the access arrangements to the pontoon are being re-assessed and designed.

Of note is that from 6 April 2014 the Docks Regulations 1988 are to be revoked because the duties in them have been replaced by more modern legislation. There is now an Approved Code of Practice and guidance (ACOP) for Safety in Docks published by the HSE. Whilst not all of the ACOP will be applicable to Harbours such as the River Hamble, some of it will and it should become a seminal reference. It should be referred to when rectifying this outstanding non-conformity and in the review of “dry side” Health and Safety (see below).

3.2 Observation 1/13

Whilst multi agency drills for major accident drills are extremely difficult to organise we urge that consideration be given to exercise a major accident such as this, even if it is an internal desk top drill involving all of the Harbour Staff.

This Observation remains outstanding.

As there was a multi-agency pollution drill in 2013 it is planned to organise a drill involving a major accident (non-pollution) in 2014.

It is noted that an emergency response drill was held on 21/11/13. The scenario was detailed and there was a “debrief”, although there were no formal records generated or “lessons learned”.

3.2.1 Recommendation 1/14

The report of the Oil Spill Exercise should be filed with the Oil Spill Response Plan.

3.2.2 Recommendation 2/14

When a drill is held a formal record should be generated including “lessons learned”.

3.3 Observation 2/13

The management of risk associated with the use of the fishermen’s jetty provides a challenge. It is understood that at the funding stage the option for lighting, power and water was turned down by the fishermen who would have had to have contributed additional funds. This has left the jetty unlit and without guard rails (if indeed they are needed).

Lighting has now been fitted to the pontoon.

4 Extra-ordinary weather

Standard Operating Procedure 002 was updated in February to recognise that at times in extreme weather it may be necessary for the Marine Director and/or Harbour Master to make judgement calls regarding the nature of assistance and response the patrols should provide and when it may be necessary to increase the persons in patrol boats or cease patrols. An informative Local Notice to River Users was issued on 28/02/14 to disseminate the lessons learned from the period of extreme weather. This type of information has value and it was good that the River Hamble Mooring Holders Association forwarded the Notice to its members with its recent newsletter. It is heartening to know that all stakeholder groups were willing to assist and there was a team spirit during the bad weather.

Of note, is the assistance that was provided to boats that were damaged or broke loose. The Harbour Authority did sterling work in securing boats, minimising damage and informing owners.

The hydrographic effects of the storms have been visually monitored and the senior staff have confidence that the entrance channel remains safe. Should the line surveys which are undertaken as part of the major dredge in Southampton Water show an anomaly then a more detailed survey will be brought forward from the usual schedule.

One of the consequences of the storms was the extra gravel deposited onto the slipway adjacent to Warsash Sailing Club. It may be prudent to consider what impact the extra-ordinary weather would have had on the new slipway arrangements if it had been completed before the storms.

5 Incident Records

The patrol log sheets are well compiled and the Incident Reports of the required high standard. The output from these records was fed into the Harbour Management System and information was extracted to graphs and pie charts to determine trends. These records will serve the Harbour Authority well when enquiries are made by the insurers covering the claims arising from the storms.

6 Continual Professional Development

6.1 Deputy Harbour Master

Her acceptance on the new Harbour Master Certificate of Competency course later this year deserves note. This professional qualification is the first of its type for Harbour Master's and has been approved by the MCA and the UKHMA. SQEP (Suitably Qualified and Experienced Person) is now a widely required criterion when examining any safety management system.

6.2 Trainee

The ongoing training program for the trainee also deserves note. He should finish his HND in Business Studies later this year with the intention of going on to study for his Harbour Master's Diploma. It is a certainty that young qualified professionals in the harbours industry will be in short

supply. The foresight of the River Hamble Harbour Authority to initiate such a training scheme should be noted.

7 Boatmaster's Licence Regulations

After successful lobbying from Harbour Masters both collectively and individually the MCA have now recognised that it is for a Harbour Authority to determine what qualifications should be held by patrol officers. This is consistent with adherence to a robust risk based SMS as required by the PMSC. The about-turn by the MCA demonstrates that common sense can prevail, especially when concerted effort is applied by professionals. If the MCA had insisted that the Regulations did apply the RHHA would have been faced with, in my view, unnecessary training costs for a disproportionate qualification. Whilst the concept of SQEP is sound it only requires "suitable" training not disproportionate or irrelevant training. All the patrol officers hold at least RYA powerboat level 2 and coupled with the SMS, this, in my view, provides SQEP. There are plans to train one of the patrol officers to become a RYA powerboat instructor allowing RHHA to train and certify (on behalf of the RYA) future recruits.

One of the concerns raised by the MCA during the above debate was the increased risks associated with towing. The risk assessment was revisited in February 2014 and the procedure has been refreshed to ensure it remains robust.

8 Shoreside Health and Safety – management of "dry side" risks

The PMSC deals with "wet side" risks. Hampshire County Council no longer conducts Health and Safety audits on the RHHA but occasionally they will conduct spot checks. The last "assessment form" from the COSHH manual that relates to unleaded petrol (some is stored for refuelling the smaller patrol boats) is dated 03/01/01. The last premises inspection by a Health and Safety expert is dated 24/04/09. Whilst the management of wet side risks is robust there are indications that improvement can be made to the management of dry side risks.

During this audit the refuelling of patrol boats was examined. This is an operation that spans both wet and dry side risks. It is important that the interface between the two systems (PMSC and H&S) does not leave any gaps.

8.1 Recommendation 3/14

The Oil Spill Contingency Plan contains a safe refuelling procedure and this should be incorporated into a SOP within the SMS.

8.2 Recommendation 4/14

The management of dry side risks and the involvement of the Health and Safety experts at HCC should be revisited and reviewed especially the risks associated with the workshop, chainsaw and grinding etc.

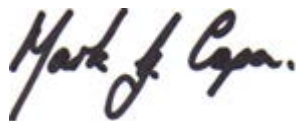
9 Talk with Harbour Staff

As part of this audit I spoke with one of the patrol officers. A discussion point was raised regarding the use of “kill cords” when driving the larger patrol boats. As a consequence of this discussion the use of kill cords has been restated and the risk assessments and SOPs refreshed.

10 Conclusion

This audit confirms that compliance with the Port Marine Safety Code is robust. Compliance is audited independently and assured to the Duty Holder by an independent Designated Person. Compliance with dry side Health and Safety laws regulations needs to be reviewed. The Health and Safety experts at HCC should similarly assure the Duty Holder that all is well.

Respectfully submitted



Mark G Capon
Designated Person under the Port Marine Safety Code
For and on behalf of Regs4ships Ltd

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