

**Port Marine Safety Code
Annual Performance Review
Year Ending 31 December 2023**



Marine Advisor

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1 Executive Summary

The Port Marine Safety Code (PMSC) requires Harbour Authorities to report publicly on their performance and compliance at least every three years. The last formal request from the Maritime and Coastguard Agency (MCA) was in 2021 and compliance was confirmed by the MCA on 31 January 2022. Recent delays in the reissue of the Port Marine Safety Code (originally expected Q1 2024) suggest that the MCA are unlikely to request formal reporting of compliance until it is issued, but we will continue to ensure we maintain compliance to this code. This document considers PMSC compliance of all ABP ports and harbours during 2023, by means of reviewing incident trends, activities, events, and achievements.

This annual review confirms that ABP continues to remain compliant with the PMSC, across a wide range of ports having very different levels of shipping movement numbers, and types of visiting vessels. The audit regime has been particularly helpful in identifying specific challenges with smaller ports in the group and the need to propagate best practice from larger regional ports to smaller ports. The south west ports newly introduced SMS were tested for efficacy through audits and despite these highlighting areas for improvement which were addressed (and continue to be addressed) by follow up and action they were found to be compliant. The 2023 review also confirms that incident trends are downward in all categories except for 'Pilot Boarding Defects' where we have seen 5% increase of instances in this category despite continued campaigns to resolve. ABP has also seen a 2.11% decrease in vessel movements throughout 2023.

The Marine Policy also states that ABP will aim for continual improvement in standards of Marine and Navigation Safety, and this report also identifies some areas of focus for such improvements.

2 Introduction: ABP as Harbour Authority

ABP is owned by ABP (Jersey) Limited, a limited liability company domiciled and incorporated in Jersey. However, under Part II of The Transport Act 1981, ABP is controlled by Associated British Ports Holdings (ABPH) which has powers over ABP corresponding to the powers of a holding company over a wholly owned subsidiary. The Directors of ABP are appointed by ABPH, but ABPH has no power to give directions to the Directors of ABP in respect of the execution of their powers and duties as a Harbour Authority.

ABP is the Statutory and Competent Harbour Authority for the following ports and harbours, as well as the Humber Estuary Services. The precise nature of the arrangements varies according to local circumstances:

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Ayr	Goole	King's Lynn	Southampton (inc. SGW)
Barrow	Grimsby	Lowestoft	Swansea
Barry	Hull	Newport	Troon
Cardiff	Humber	Plymouth	Teignmouth
Fleetwood	Immingham	Port Talbot	
Garston	Ipswich	Silloth	

This document reviews performance in relation to the requirements of the Port Marine Safety Code during **2023**, and provides a summary of marine activities at all the locations listed above which are relevant to navigational safety and environmental protection within the diverse Statutory Harbour Areas managed by ABP.

3 ABP's Commitment to the Port Marine Safety Code

3.1 Marine Policy

ABP publishes a Marine Policy, which was reissued in April 2024 with minor changes. The current version can be found on the company web site <https://www.abports.co.uk/marine-information-and-compliance/abp-marine-policy-and-pmsc/> but this report references the old Marine Policy as the report period covers the time the old policy was in force.

The Marine Policy aims to demonstrate our commitment to the safe and responsible operation of our ports and harbours by detailing areas of primary concern (which are closely based on the requirements of the Port Marine Safety Code). Linked to this policy and forming an integral part of PMSC compliance, ABP has published a group Marine Safety Management System, and each ABP port and harbour has prepared plans and procedures detailing the way this policy is to be locally implemented.

3.2 Audit and Verification

The below following ports were audited (internal and external) during 2023. The audit regime was particularly helpful in identifying specific challenges in some of the smaller south west ports with implementation of the SMS which were addressed via further follow up audit and action.

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Location	Date	Audit Type
East Anglia (Lowestoft, Kings Lynn & Ipswich)	1 st – 3 rd March	External Audit
Barrow	14 th March	Internal Audit
Fleetwood	15 th March	Internal Audit
Garston	16 th March	Internal Audit
Humber Estuary Services	18 th April	Internal Audit
Plymouth	12 th June	Internal Audit
Teignmouth	13 th June	Internal Audit
Southampton	12 th September	Internal Audit
South Wales (Newport, Cardiff, Barry, Swansea & Port Talbot)	25 th – 26 th September	Internal Audit
Silloth	7 th November	Internal Audit
Ayr	8 th November	Internal Audit
Troon	9 th November	Internal Audit
Humber Ports (Hull, Goole, Grimsby & Immingham)	27 th – 29 th November	External Audit

The Harbour Authority hold their meetings five times a year in combination with the Health and Safety board, known as the “Harbour Authority and Safety Board” - a report was submitted for each of these meetings held during 2023.

The Marine Advisor reports delivered to each meeting continued to highlight current concerns and issues, and provided statistical indicators of navigational and environmental incidents, including trends categorised by incident type as well as by port (region).

Selected Key Performance Indicators (KPIs) were also detailed in each report. The data that supports these reports is extracted directly from the ABP PAVIS and MARNIS software systems.

4 Key Personnel – ABP Harbour Authority

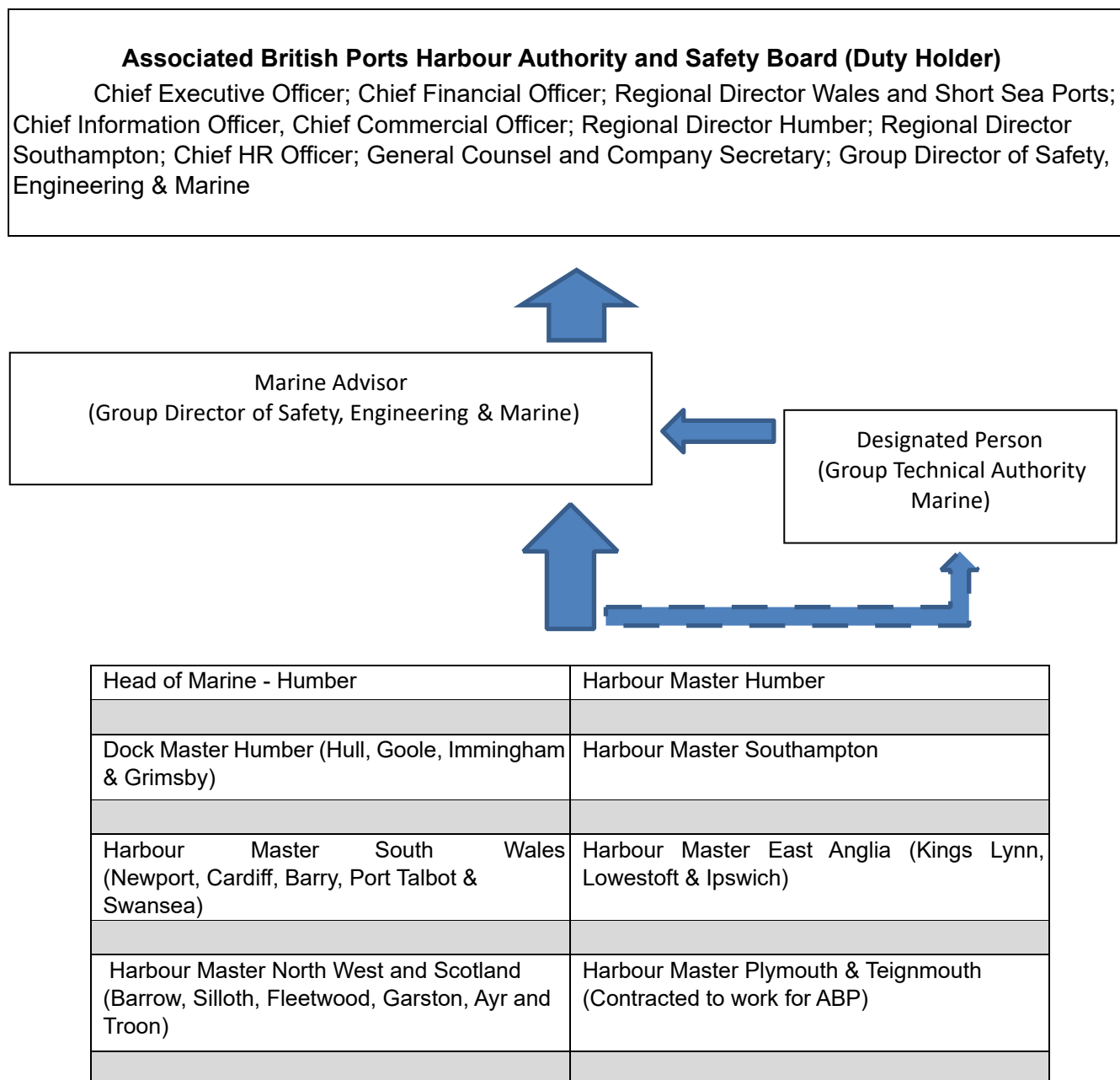
An organisation chart is shown in Figure 1. This reflects the organisation for the period of the report and does not reflect the current executive structure (2024).

The Chief Executive Officer and Chairman of the ABP Harbour Authority is Henrik Pederson. The Group Director of Safety, Engineering and Marine was Mike McCartain. The Group Technical Authority Marine and Designated Person (DP) was James Clark for the first part of the period, and for the second part the position was gapped with Mike McCartain covering the DP duties and ABPmer contracted to deliver the internal audits.

Plans were agreed in 2021 for a restructure of the marine function in the four north west ports of Garston, Fleetwood, Barrow and Silloth. A Divisional Harbour Master was appointed in 2022 to manage the Harbour authority functions for the four ports (like the divisional model adopted in East Anglia during 2020). On the departure of the Ayr and Troon Port Manager in Spring 2023, the decision was taken to extend the duties of the NW Ports Regional Manager to include the Scottish ports; at the same time the decision was taken to extend the Harbour Master duties similarly.

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Figure 1: ABP Harbour Authority Organisation Chart



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5 Vessel Movement Statistics

Figure 2: Annual Shipping Movements 2015 to 2023 – data sourced from PAVIS (see also Fig. 4 for graphic representation)

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Goole	1,265	1,292	1,522	1,552	1,545	1,347	1,177	1,266	1,058	892
Grimsby	2,473	3,324	2,671	2,092	1,851	1,789	1,553	1,645	1,348	1,528
Hull	5,743	6,694	5,681	5,915	6,275	6,392	5,516	5,638	4,885	4,583
Humber Estuary Services	29,029	30,601	30,004	29,833	29,779	28,479	25,217	26,653	24,761	23,313
Immingham	10,881	10,570	11,312	11,531	10,997	10,431	9,347	9,706	9,762	9,288
Southampton	67,203	64,377	66,393	63,062	65,066	67,351	43,555	45,809	53,930	53,946
Ayr	298	276	336	203	259	285	230	293	205	147
Barrow	199	119	157	335	157	151	154	158	145	99
Fleetwood	0	0	0	0	0	0	0	0	0	0
Garston	332	325	415	518	381	401	389	535	378	432
Ipswich	1,455	1,622	1,720	1,444	1,296	1,399	1,324	1,315	1,319	1,090
Kings Lynn	464	516	485	369	360	376	379	449	348	402
Lowestoft	1,011	1,073	1,384	1,317	1,106	1,410	1,189	1,173	1,328	1,762
Plymouth	754	722	747	698	685	797	319	244	606	644
Silloth	136	92	106	93	118	125	82	85	56	58
Teignmouth	359	326	304	349	351	294	298	299	236	183
Troon	895	604	195	197	213	309	386	426	221	106
Barry	312	336	271	310	375	310	308	524	198	853
Cardiff	1,689	1,734	1,482	1,554	1,323	944	1,011	1,087	929	872
Newport	1,450	1,269	1,423	1,524	1,532	1,577	1,652	1,922	1,630	1,697
Port Talbot	573	353	337	334	328	362	350	397	338	360
Swansea	1,009	811	815	721	760	696	653	656	565	513
TOTAL	127,530	127,036	127,760	123,951	124,757	125,225	95,089	100,280	104,246	102,046

	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Southampton	67,203	64,377	66,393	63,062	65,066	67,351	43,555	45,809	53,930	53,946
Humber	49,391	52,481	51,190	49,371	50,447	48,438	42,810	44,908	41,814	39,604
South Wales	5,033	4,503	4,328	4,443	4,318	3,889	3,974	4,586	3,660	3,573
Short Sea Ports	5,903	5,675	5,849	5,523	4,926	5,547	4,750	4,977	4,842	4,923
TOTAL	127,530	127,036	127,760	123,951	124,757	125,225	95,089	100,280	104,246	102,046

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6 Incident Statistics

ABP assesses all marine risks at each port to ensure that suitable controls are in place to reduce the risk of any hazard to as low a level as is reasonably practicable (ALARP) – the key principle of the PMSC.

Incidents which occur are recorded and reviewed. The more significant or serious incidents that require in depth investigation will lead to reviews of the associated risk assessments, with recommendations being made to improve control measures and help prevent similar incidents occurring in the future. This process is clearly documented in the ABP Group Marine Safety Management System and implemented at each port and harbour. All ABP ports use the group MarNIS incident and risk assessment database (software package) to ensure consistent reporting, investigation and follow up of all incidents. In addition, a standardised Marine Incident Investigation template document is used to standardise the way ABP investigate and report marine incidents.

Incident numbers and trends are key indicators to the success of the Harbour Authority's Safety Management System, and therefore incident numbers were reported in detail to the Harbour Authority at its Board meetings during 2023. The following figures have been extracted from the MARNIS incident database and illustrate some of the key statistics from across the ABP group of ports for 2023, as well as trends over the last 3 years.

This report reviews the performance of the ABP Statutory Harbour Authorities across 22 diverse Harbour authority areas. The report does not seek to replace more detailed reports produced at port level. This report has drawn on the reports and data that were routinely collected to produce reports to the Harbour Authority meetings, as well as other data collected through ABP's MARNIS and PAVIS software system.

Incident Reporting

Marine teams across ABP submitted a total of 493 marine safety incident / potential incident reports throughout 2023 and were able to investigate and close them off on average within 12 weeks. 27 fewer incident reports were received when compared with 2022 (522 reports received 2022), however these reporting levels indicate ABP's reporting culture remains mature and well established. The ratio between near miss reporting and actual incident reporting continues to see a gradual improvement, the importance of near miss reporting is highlighted during audits and other engagements.

	2021	2022	2023
Groundings	21	28	22
Heaving Line Reports	52	34	29
Pilot Boarding Defects	83	73	77
Impact with Structure	78	73	44
Equipment Failure (Vessel)	107	37	73
Collision Ship to Ship	5	6	3

Some of these 3-year data sets are displayed in graphic form (from fig 4).

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'Pilot boarding defects' became the highest volume of incident category reported through 2023 with 73 incidents. Almost 60 percent of these incidents occurred in Southampton and another 30 percent at HES. 'Equipment Failure (vessel)' incidents also saw a significant increase and were almost double the amount recorded in the previous year.

In terms of continuous improvement in the category 'Pilot boarding defects' the following areas of mitigation are highlighted as follows:

Non-compliant / defective Pilot boarding defects – Mitigations:

- Pilots are empowered to refuse to board vessels with unsatisfactory or unsafe boarding arrangements.
- Use of 'Spot It' system to report defective or unsafe arrangements.
- Some vessel movements are delayed or cancelled if non-compliant or defective pilot boarding arrangements are observed.
- Reports of defective pilot ladders are passed onto local MCA marine offices for port state control action.
- ABP pilot boarding safety poster.
- ABP share all defective pilot ladder reports with MAIB, MCA HQ and UK Marine Pilots Association (UKMPA) which contributes to data gathering at a national / international level.
- Requirements to use compliant boarding arrangements highlighted during pre-arrival notifications.
- Pilot boat crew (whilst hooked on) test ladders before use.
- Engagement with MCA.
- Pilot boarding and landing courses.
- ABP participated in the review and updating of the pilot boarding and landing code.

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Figure 3 – Shipping Movements by Region by Month.

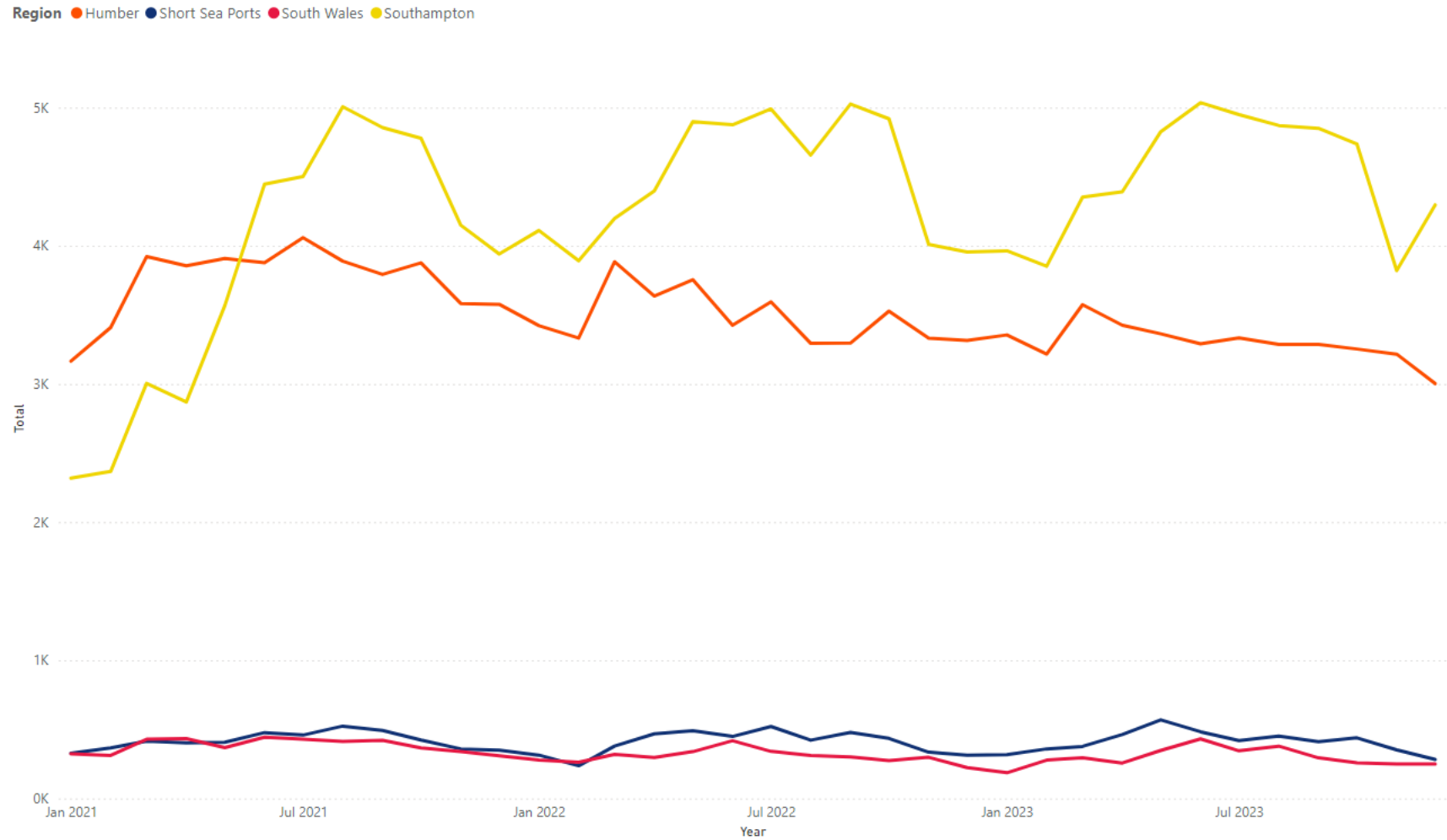


Figure 4: Nautical Safety Incident Trends (by incident type) – 3-year data (trends specified in later graphics).

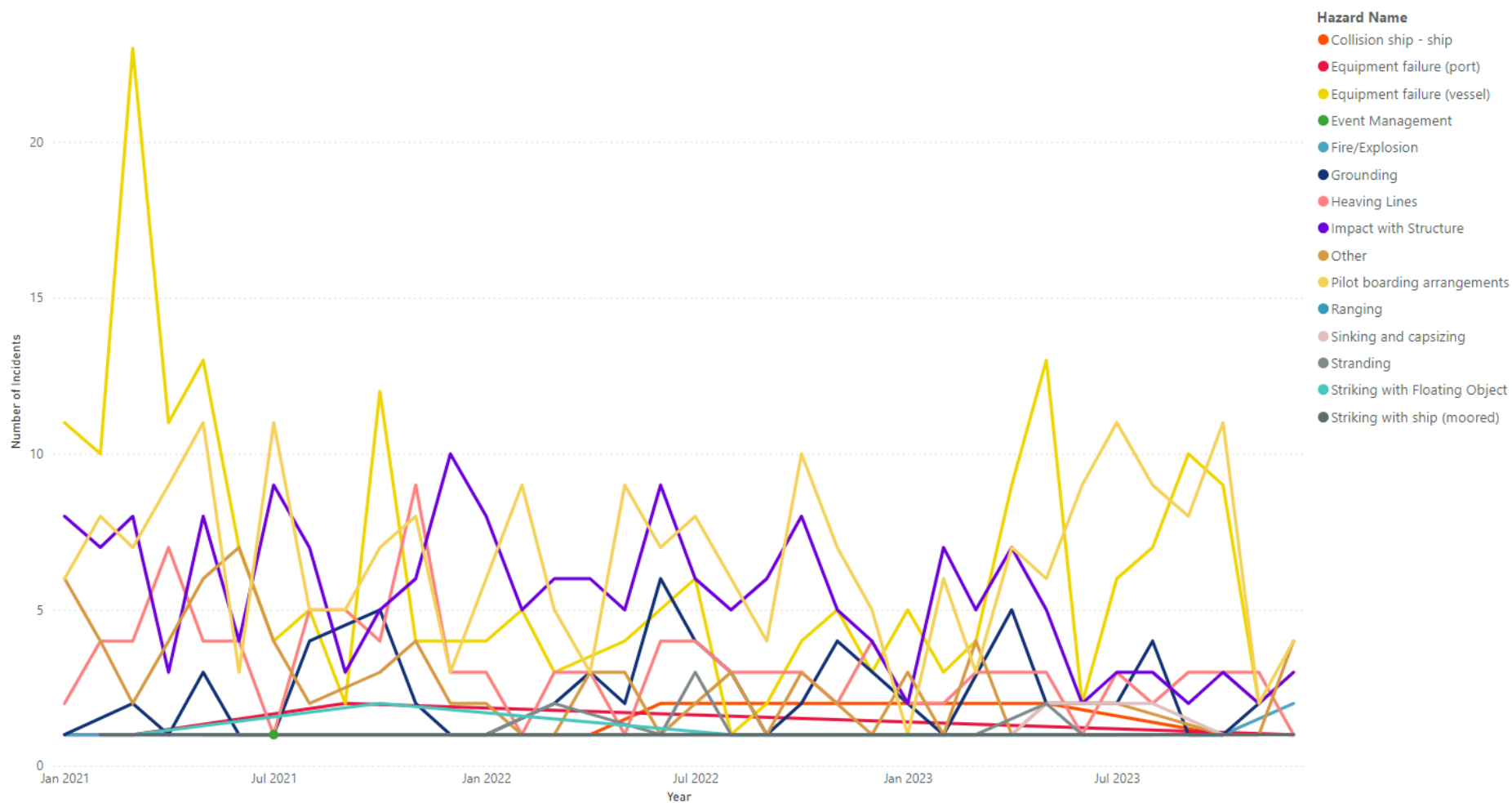


Figure 5: Equipment Failure (vessel)
Trend – Declining since 2021.



Figure 6: Groundings– 3-year data – **No trend observed.**

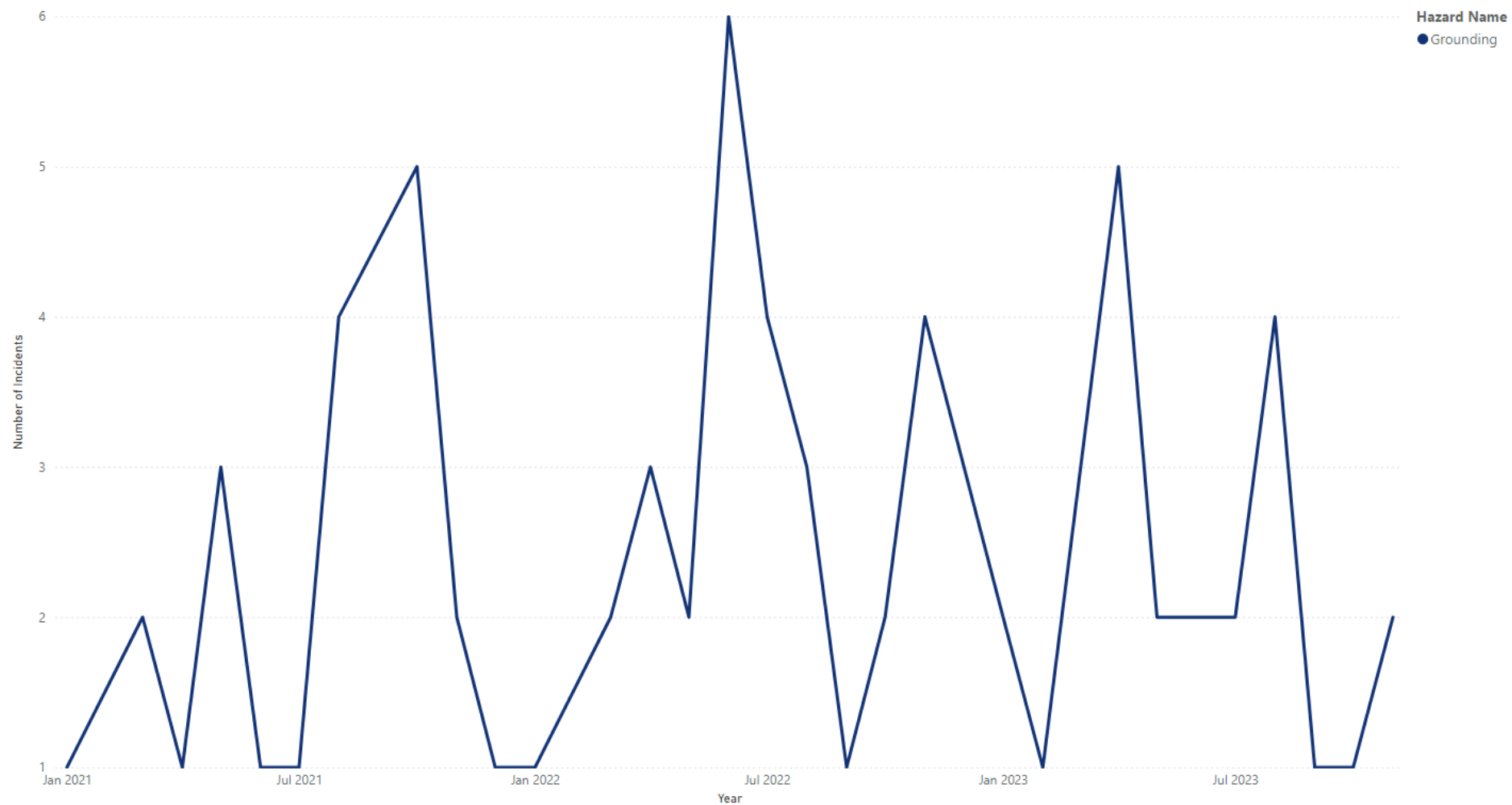


Figure 7: Heaving line reports – 3-year trend – **Trend observed declining but requiring continuous monitoring.**

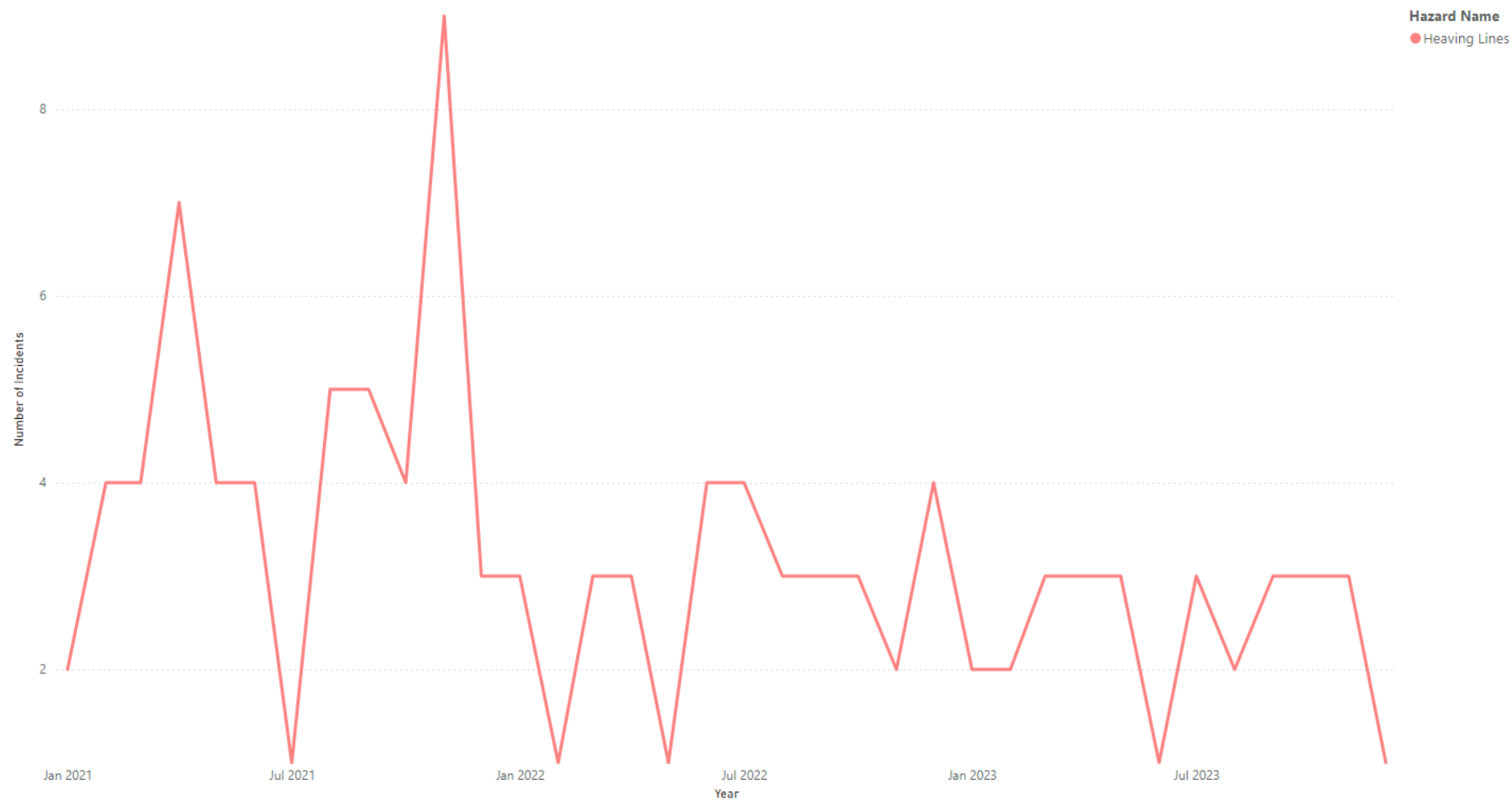


Figure 8: Pilot Ladders (Non-compliance) – No trend observed – inconsistency in instances – continued campaigning required (MCA agree and have commenced own campaign).

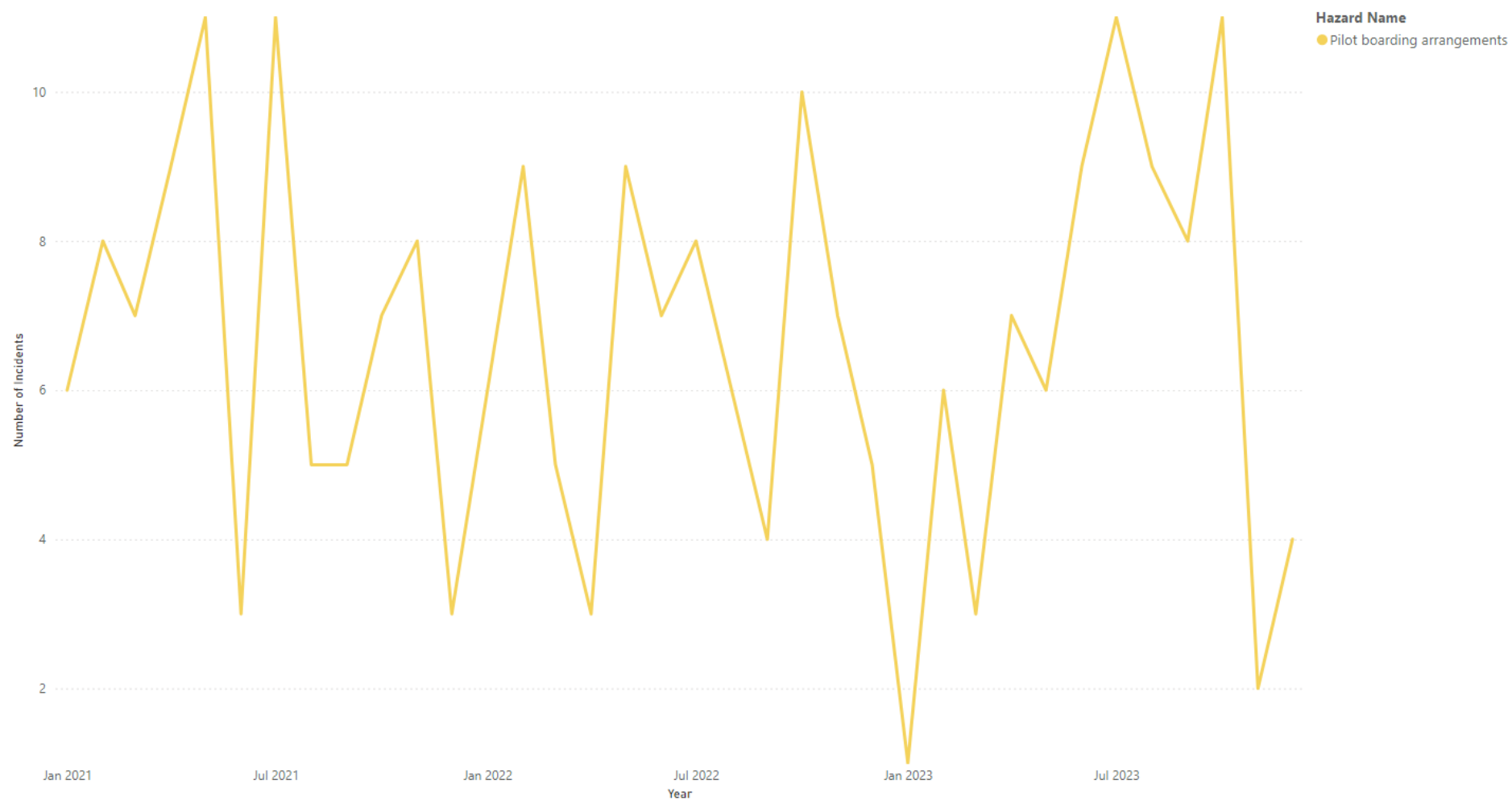


Figure 9: Mean Number of weeks to close reports for 2023 – **Ayr and Troon data noticeably different from the rest of group due to an external investigation by a third party taking a protracted time and delaying ABP staff closing report.**

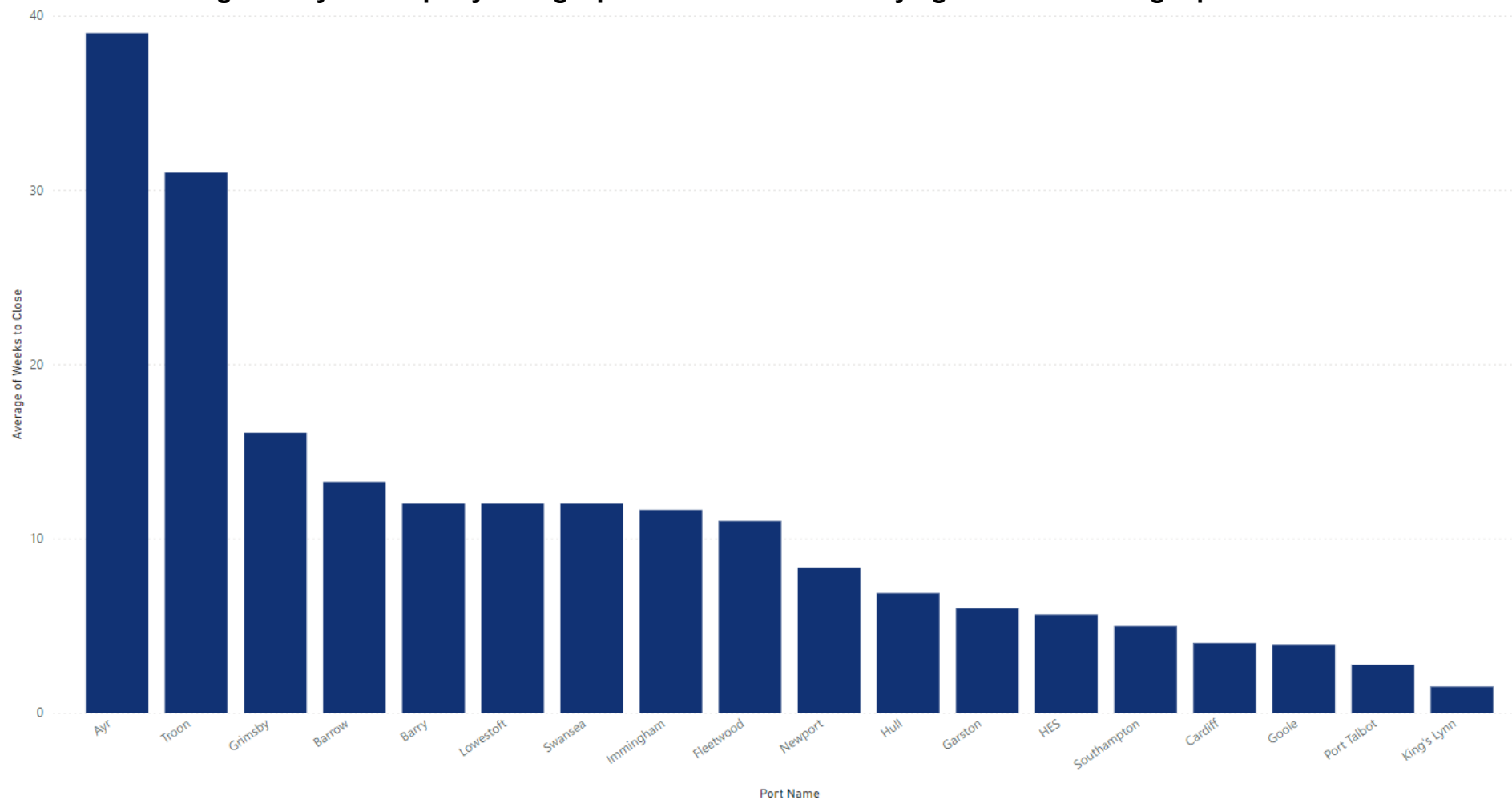


Figure 11: Number of reports from each port and time to close off report for 2023.

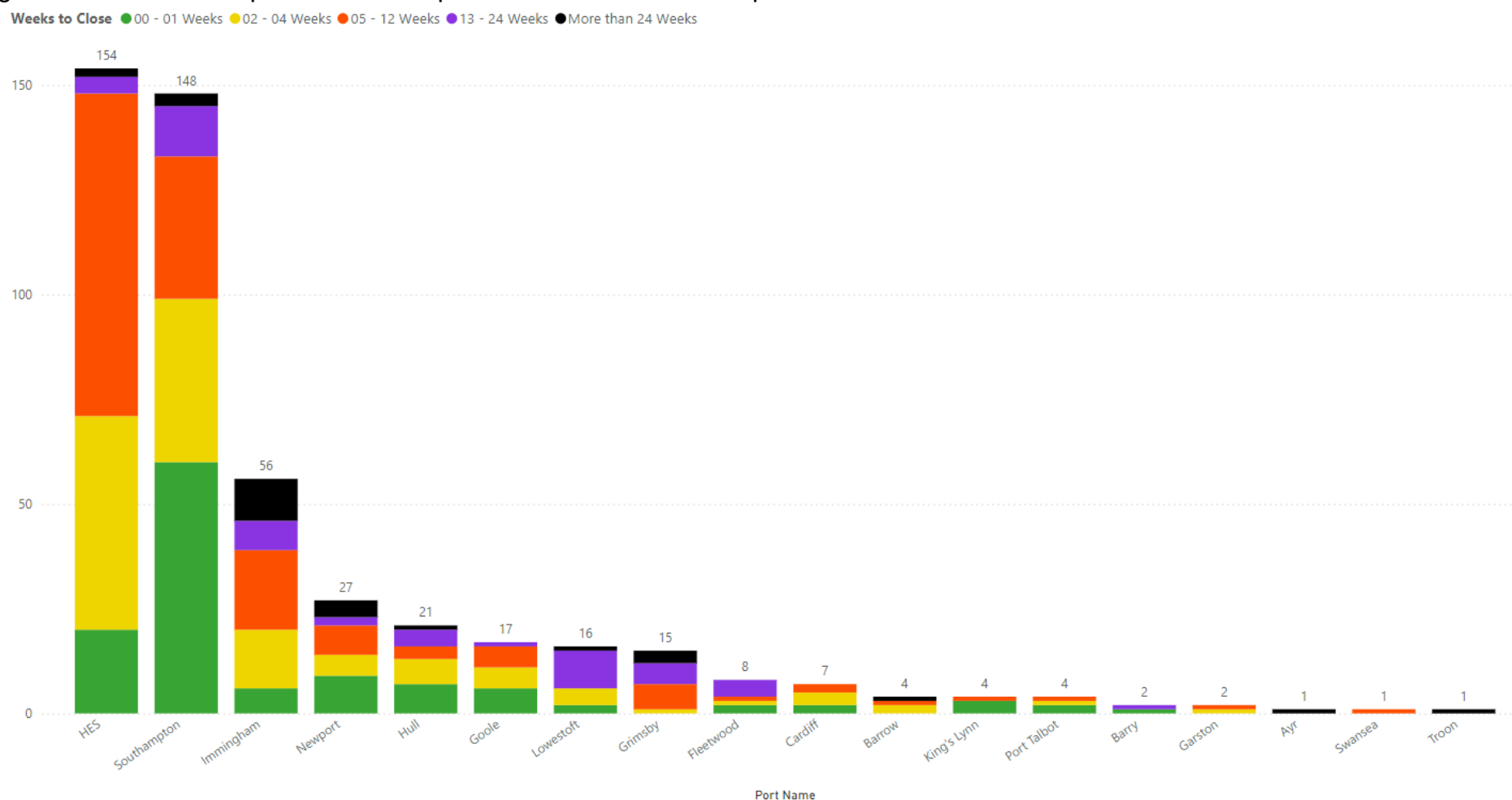
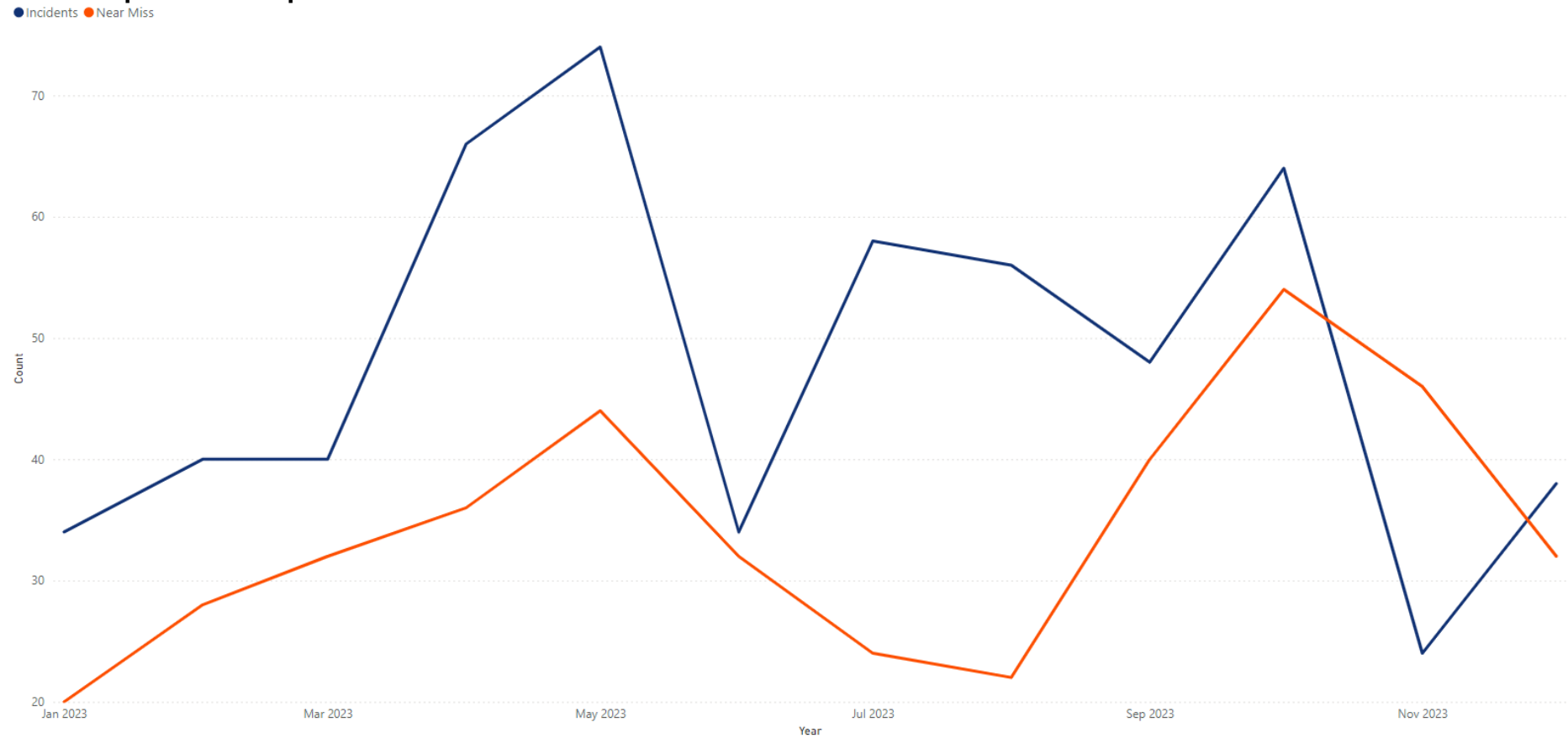


Figure 12: Total Incidents and Potential Incidents Trend for 2023 – **Shows near-miss reporting requires continuous promotion and remains part of audit process.**



7 Commentary and Continuous Improvement

2023 Reviewed

Marine Policy

The Marine Policy was reviewed in May 2023 as part of an annual review, with no significant additions being made.

Russian Sanctions

2023 saw a continued focus around implementing the governments regulations banning Russian ships from entering UK ports. The previously established process where 4 Marine teams across ABP carried out daily searches of ships bound for ABP ports continued using the Lloyds List SeaSearcher software which enabled the teams to search through the varying complex layers of ship owner / operator status. The Department for transport also shares lists of potential ships of interest which supplements ABP's due diligence.

Wrecked and Abandoned Vessels

Continued focus on managing wrecked and abandoned vessels continued throughout the year, particularly in Southampton (River Itchen), Fleetwood, Hull, Kings Lynn and Lowestoft with particular progress being made in Lowestoft and Southampton.

Electronic Master Pilot Exchange (EMPX)

The EMPX, introduced in 2022 to replace the paper-based Master Pilot Exchange and passage planning process with an electronic system, continued to bed in across ABP. The benefits realised were seen to include:

- Planned passage times / tidal calculations being consistently generated.
- Predicted tidal currents at key points to improve safety.
- Data fields are pre-populated to reduce manual data entry requirements.
- Significant savings in repetitive / manual entry or correction of data.
- Access to real time information.
- Records can be held and retrieved / accessed more easily for analysis and incident investigation.

Marine Training KPI

The introduction of a tool for measuring our ports compliance with the marine training matrix based on centrally held training records has allowed granular understanding of training requirements and progress and the data from this tool is now made available to the Harbour Board for regular review and reporting.

MarNIS:

MarNIS continues to prove itself an excellent system to monitor risk and allows better visibility and insight into incident data following the software upgrade in 2022. Near miss reporting remains an important area of focus and whilst we strive for 2 near misses to every incident for 2023 we saw 205 near misses and 288 incidents (71%).

Audit and Verification

All ABP regions / ports were audited (externally or internally) during 2023. Audit themes identified during the year included:

- Compliance with Marine Training Matrix.
- Review of Marine Safety Management System, post group additions (MA Notices).
- Review of risk assessments after incidents occur.
- Appropriate management and review of risk scoring in navigational risk assessments.
- The need to improve near miss reporting (2 near miss reports for every actual incident).
- Management of wrecked or abandoned vessels.

Vessel Movements

ABP vessel movements throughout 2023 were **down by just over 2%** on the recorded movements for 2022.

8 Progress against Objectives Set in Previous Report

The Marine Safety Plan was last reviewed in 2020 where an additional target that focused on mitigating defective pilot boarding arrangements and dangerously weighted heaving lines was introduced. The Marine Safety Plan 2020 – 2023 is no longer available on ABPs website having been replaced with the new Safety Plan in April 2024, but the table below describes those targets that formed the older plan and indicates progress against completion at the end of December 2023.

	Description	Target	Time Scale	Progress at close of 2022
1	Keep KPIs under review and introduce new / relevant KPIs as appropriate	Monitor KPIs and review as required.	Annually	Marine Training KPI and supporting Dashboard implemented in October 2022.
2	To ensure consistent application / implementation of the MSMS across all ports	Successful annual internal audit at each location	Annually	Audit plan for 2023 completed and plan for 2024 published and almost complete.

3	Review Marine Policy	Annual or as required by external factors	Annually	Review undertaken in Dec 2022. Note new Marine policy issued April 24.
4	Review Marine Operations Manuals	Annual or as required by external factors	Ongoing (via audit)	Progress to be monitored via annual audit regime
5	Improve level of Potential Incident Reporting	To achieve a group wide ratio of two potential reports for every actual incident report submitted	End 2023	Improvement observed, continued emphasis to be raised at audit and heads of Marine.
6	Harbour Directions	One port to have made and issued Harbour Directions	End of Q2 2021	Not complete, progress on Humber ports and Lowestoft prioritised by Legal team for 2022.
7	Consolidated Port Operational Procedures Manuals	All ports to evidence a working cooperation between Group updates / local update of SMS	Ongoing (via audit)	Progress to be monitored via annual audit regime
8	To volunteer for at least one MCA Health check per year	Formally contact MCA Ports Liaison Lead annually	Annually	Offer made to MCA but not taken up.
9	Continue to maintain a focus on mitigations around the use of Dangerously Heaving Lines and defective pilot ladders	Ensure data around these incident categories are captured and reported through to MCA, engage with ship's crew, support enforcement / penalty actions	Ongoing (reported via HASB)	Increase in the take up of Pilot ladder safety courses completed for 2023. Reports of defective pilot boarding arrangements and heaving lines marginally increased in the period.

9 Continuous Improvement Plan

In addition to publishing a Marine Safety Plan identifying specific marine safety improvement target, ABP has also identified the following continuous improvements (as part of the “Marine Safety Plan”) which are followed in conjunction with Group initiatives to constantly improve the safety of all activities taking place within ABP Ports and Harbours. These remained unchanged for the period.

	Task	Detail
1	Timetable audit and support visits	Constantly review audit dates (in co-operation with other Group Compliance functions) and ensure none are missed, or unduly delayed
2	Undertake visits	Visit ports / Harbour Masters according to timetable. Follow up previous action points, themes identified at other ports, or by external bodies (MCA / MAIB). Provide support and training as required.
3	Establish action points	As a result of visits, establish action points and areas for improvement. Also identify areas of best practice for sharing with all other ABP Ports
4	Report	Feedback visit findings within a reasonable time, and clearly summarise any actions that the port is recommended / required to take to ensure improvement.
5	Keep “Work Plan” and “Marine Safety Plan” up to date	Maintain a constantly updated database of actions / Areas of best practice with due action dates and details of who is responsible for completing actions.
6	Promulgate outcomes	Ensure that all ports are made aware of key improvement points and areas of best practice by appropriate means (For example, MA Notices, Conference presentations, updates to Group MSMS, etc.)
7	Regularly follow up action progress	Regularly review due dates of identified actions and prompt those responsible to feedback what has been achieved, closing out actions before due date. Proactively follow up any outstanding actions not complete by due date.
8	Repeat Cycle Annually	

10 Public Compliance Statement

Sections 2.26 to 2.28 of the Port Marine Safety Code (and section 2.2 of the Guide to Good Practice) require the Duty Holder to publicly state continued compliance with the Code.

The ABP Harbour and Safety Authority were able to positively confirm their compliance with the requirements of the PMSC in a letter of compliance to the MCA in November 2021. The Marine Policy, reviewed in May 2023 also describes how this compliance is achieved. ABP remained compliant with the PMSC for the period 2023. A formal compliance report to the MCA is expected in 2025.

On behalf of ABP Harbour Board

Paul Bristowe – Chief of Staff - 28th September 2023