



## Port Marine Safety Code

## Annual Performance Review

Year ending 31<sup>st</sup> December 2017



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## 1 **Executive Summary**

The Port Marine Safety Code requires Harbour Authorities to report publicly on their performance at least every three years. This document considers PMSC compliance of all ABP ports and harbours during 2017, by means of reviewing activities, events and achievements.

This annual review confirms that ABP continues to remain compliant with the Port Marine Safety Code, across a wide range of ports having very different levels of shipping movement numbers, and types of visiting vessels.

ABP, through the Marine Advisor's office, strives for *consistent* compliance with the code and this report illustrates some examples of how that vision is achieved.

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 where such improvements can be achieved.

The report concludes with the assessment that the ABP Group was compliant with the Port Marine Safety Code during 2017. ABP were also able to confirm their compliance with the Port Marine Safety Code with the MCA in January 2018 by submitting a 3 yearly letter of compliance signed by the ABP Chief Executive.

## 2 **Introduction: ABP as Harbour Authority**

ABP is ultimately owned by ABP (Jersey) Limited, a limited liability company domiciled and incorporated in Jersey. However, under Part II of The Transport 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, although the precise nature of the arrangements varies according to local circumstances:

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

This document reviews the performance of both *Harbour Authorities* in relation to the requirements of the Port Marine Safety Code during **2017**, 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 PMSC**

#### **3.1 Marine Policy**

ABP publishes a Marine Policy, which was last revised during May 2017. The current version can be found on the company web site <http://www.abpmarine.co.uk/>

The ABP 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 the overarching "Marine Safety Management System", ABP has published a Port Marine Operations Manual at Group level, and each ABP port and harbour has prepared plans detailing the manner in which this policy is to be locally implemented.

The following statement has also been published by ABP on the corporate web site:

#### **3.2 Audit and Verification**

During 2017 the Marine Advisor and Technical Authority Marine maintained a programme of audit

*"Associated British Ports (ABP) is the Statutory and Competent Harbour Authority for 22 separate ports and harbours located around the UK. The breadth and depth of knowledge and experience that comes from managing these ports and harbours enables ABP to play a leading role in the ongoing development of the Port Marine Safety Code.*

*The Port Marine Safety Code, which was last revised in November 2016, serves to highlight the responsibilities that are allied to being a Harbour Authority and establishes a requirement for all Harbour Authorities to formalise their procedures.*

*In publishing the ABP Marine Policy we aim to demonstrate our commitment to the safe and responsible operation of our ports and harbours by detailing areas of primary concern and bringing transparency to our work. Linked to this policy, each ABP port and harbour has prepared plans detailing the precise manner in which this policy is to be implemented.*

*We have well established reporting procedures and performance targets; and have a designated person to provide assurances that the ABP marine safety management systems are working effectively. We have a clear system for auditing and reviewing our performance against this policy.*

*By implementing this policy, ABP continues to build upon its known track record of safe and efficient operations, while endeavouring to identify further opportunities to improve that record whenever and wherever we can."*

and verification, to satisfy the Harbour Authority that it is fulfilling its Statutory Duties, and remains compliant with the PMSC.

A formal schedule of internal audits by the Designated Person was undertaken, wherein each ABP Harbour Master and his port(s) are visited once a year, and lessons learned from these assessments are shared with all the Authority's Ports and Harbours.

In addition, the Harbour Authority commissions a formal process of annual audit of PMSC compliance by KPMG. The annual audit is targeted to support the programme of internal audits, and ensures that our internal processes are rigorous and efficient; as well as providing independent assurance of PMSC compliance at the chosen port(s). The KPMG audit is conducted at a different port region each year on a four-yearly cyclical basis.

During April 2017, the audit was undertaken in our Scottish region, covering the ports of Ayr and Troon. A full report was produced for consideration by the Audit Committee.

The following ports were internally audited by the Technical Authority Marine during 2017:

Port	Date
Ayr and Troon	April (with KPMG)
Plymouth / Teignmouth	4th May
Southampton	10th to 11th October
Ipswich	12th May
Humber Ports	11th to 12th Sep (Grimsby and Immingham) and 15th March (Hull and Goole)
HES	13th – 14th March and 13th – 14th Sep (with MCA)
South Wales	24th – 27th August
Lowestoft	11th May
Barrow and Fleetwood	4th and 5th April
Silloth	6th April
King's Lynn	10th May
Garston	19th December

The Port Marine Safety Code allows for the MCA to undertake occasional compliance audits, now known as "Health Checks". One such "Health Check" was undertaken at an ABP port during 2017 at HES.

The Health Check took place from 13<sup>th</sup> to 14<sup>th</sup> September 2017, and provided a useful external oversight of our MSMS and PMSC compliance. The MCA team concluded that:

- In general, from the areas which the Health Check covered, Humber Estuary Services as Harbour Authority and CHA appeared to have policies and procedures in place which supported compliance with the PMSC.

The following enhancements were identified:

- Humber Navigation Byelaws 1990 are due for review and currently awaiting legal clearance. It is recommended that efforts should be made to review and clear the Byelaws for publication.

- In accordance with GTGP 5.1, an external audit should be carried out every 3 years. The Peer Review that was carried out in 2016 was an internal one. It is therefore recommended to carry out an external audit at the next available opportunity.
- Under ABP's common Safety Management System, HES uses the ABP's corporate Port Marine Operational Procedures Manual and the HES Marine Operation Procedures Manual. ABP Individual ports have their own operational procedures manuals for their tasks & operations undertaken. It is recommended that individual Operational Procedures Manual be harmonised with ABP operation Manual and further integrated with MSMS for smooth operations and ready reference.
- HES should ensure close out of any outstanding findings of the internal audit carried out by the Designated Person.
- HES has completed all outstanding AtoN findings in the recent GLA inspection. It is recommended that HES obtain a final close out letter from GLA for the current period.
- Flexibility, accessibility, safety and efficiency of pilot boat operations would be greatly improved with the proposed mooring pontoon and boat facilities located next to the new VTS centre.

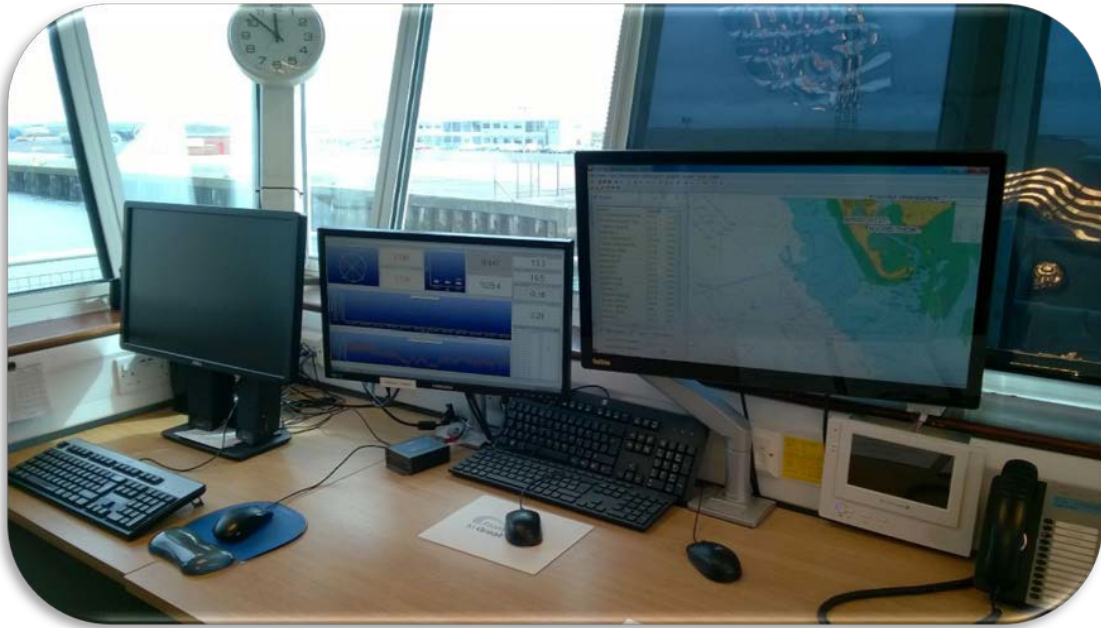
The Harbour Authority hold their meetings bi – monthly in combination with the Health and Safety board, known as the “Harbour Authority and Safety Board” - a report was submitted for each of the 6 meetings held during 2017.

The Marine Advisor paper 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 two monthly report. KPIs were continuously reviewed and revised to meet the board's requirements. The data that supports these reports is extracted directly from the ABP PAVIS and MARNIS software systems (Vessel and Risk Assessment / Marine Incident, respectively)

In common with all UK Statutory Harbour Authorities, ABP is required to confirm compliance with the PMSC in writing to the DfT (via the MCA) at 3 yearly intervals. A letter of compliance was signed by our Chief Executive and sent to the MCA in January 2018. The next such request for confirmation is expected at the end of 2020, for reply by March 2021





#### 4 Key Personnel – ABP Harbour Authority

An organisation chart (correct for 31<sup>st</sup> December 2017) is shown in Figure 1.

The Chief Executive Officer and Chairman of the ABP Harbour Authority is James Cooper. The ABP Marine Advisor and Director of Marine and Compliance is Mike McCartain. At the end of October 2017, the Technical Authority Marine and Designated Person William Heaps left ABP and handed over this role to James Clark.

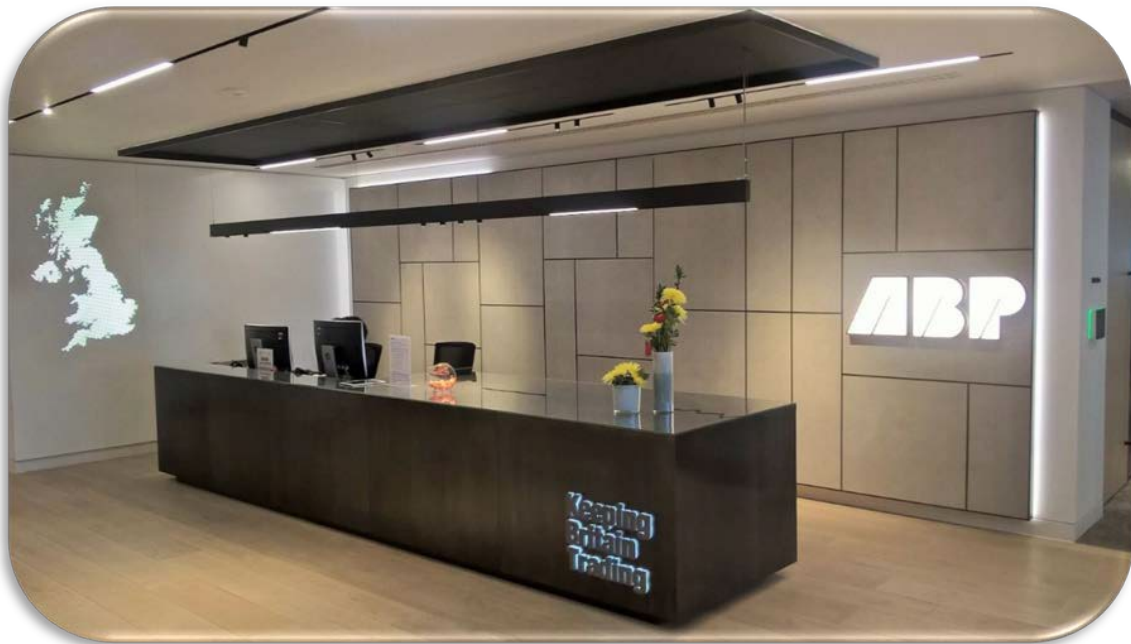
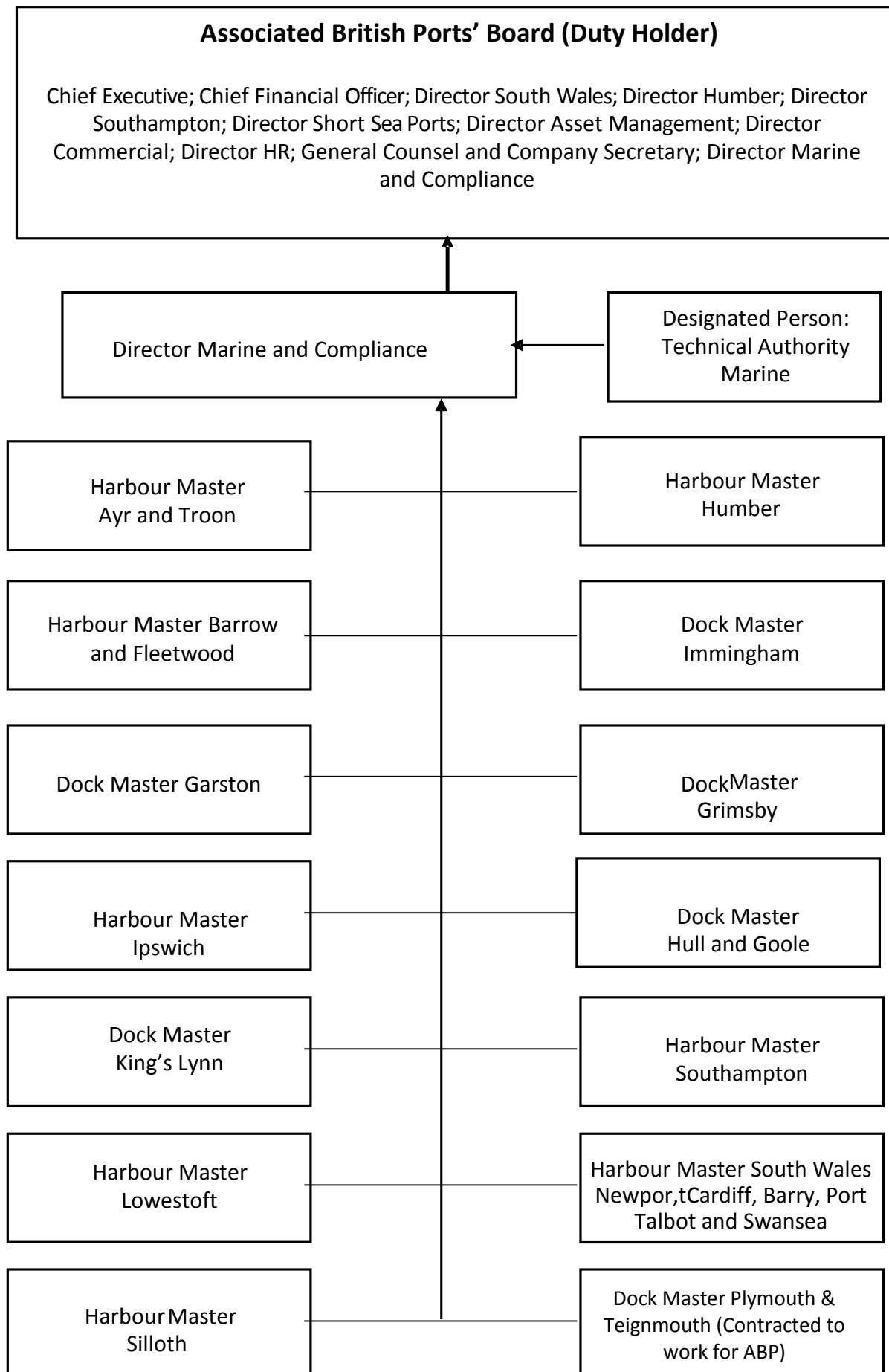




Figure 1: ABP (Harbour Authority) Organisation Chart



## 5 Vessel Movement Statistics

Figure 2: Shipping Movements 2012 to 2017

### Annual Shipping Movement

Port	2012	2013	2014	2015	2016	2017
Goole	1,242	1,363	1,265	1,292	1,522	1552
Grimsby	1,908	2,451	2,473	3,324	2,671	2,094
Hull	5,921	5,861	5,743	6,694	5,681	5,915
Humber Estuary Services	29,112	28,754	29,029	30,601	30,004	29,839
Immingham	10,862	10,519	10,881	10,570	11,312	14,610
Southampton	64,881	64,848	67,203	64,377	66,393	62,104
Ayr	255	353	298	276	336	206
Barrow	256	417	199	119	157	342
Fleetwood	0	0	0	0	0	0
Garston	399	462	332	325	415	518
Ipswich	1,792	1,259	1,455	1,622	1,720	1,444
Kings Lynn	548	488	464	516	485	369
Lowestoft	1,724	1,346	1,011	1,073	1,384	1321
Plymouth	855	780	754	722	747	698
Silloth	172	179	136	92	106	93
Teignmouth	361	364	359	326	304	351
Troon	895	931	895	604	195	200
Barry	270	298	312	336	271	310
Cardiff	2,541	1,929	1,689	1,734	1,482	1558
Newport	1,266	1,039	1,450	1,269	1,423	2447
Port Talbot	409	457	573	353	337	340
Swansea	1,204	1,198	1,009	811	815	722
<b>TOTAL</b>	<b>126,873</b>	<b>125,296</b>	<b>127,530</b>	<b>127,036</b>	<b>127,760</b>	127033

	2012	2013	2014	2015	2016	2017
<b>Southampton</b>	64,881	64,848	67,203	64,377	66,393	62,104
<b>Humber</b>	49,045	48,948	49,391	52,481	51,190	54010
<b>South Wales</b>	5,690	4,921	5,033	4,503	4,328	5377
<b>Short Sea Ports</b>	7,257	6,579	5,903	5,675	5,849	5,542
<b>TOTAL</b>	<b>126,873</b>	<b>125,296</b>	<b>127,530</b>	<b>127,036</b>	<b>127,760</b>	127,033

Figure 3: Annual Shipping Movements by Region 2013 to 2017

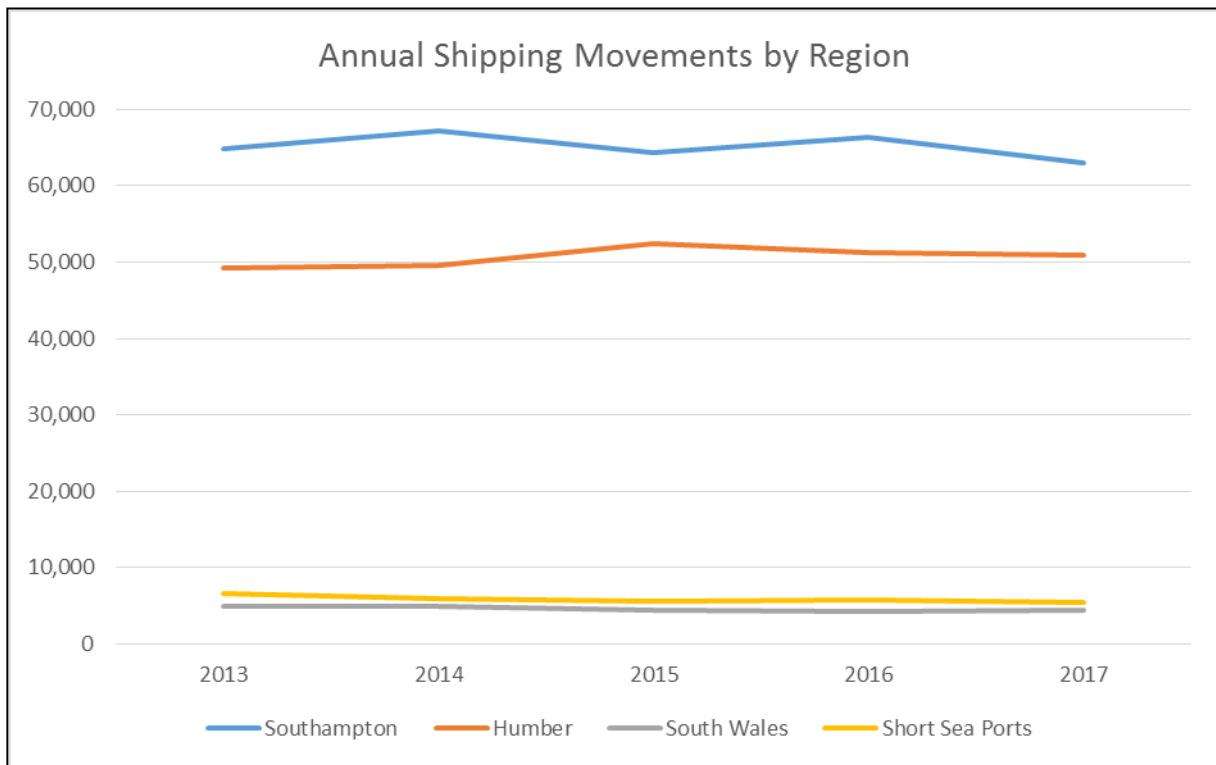
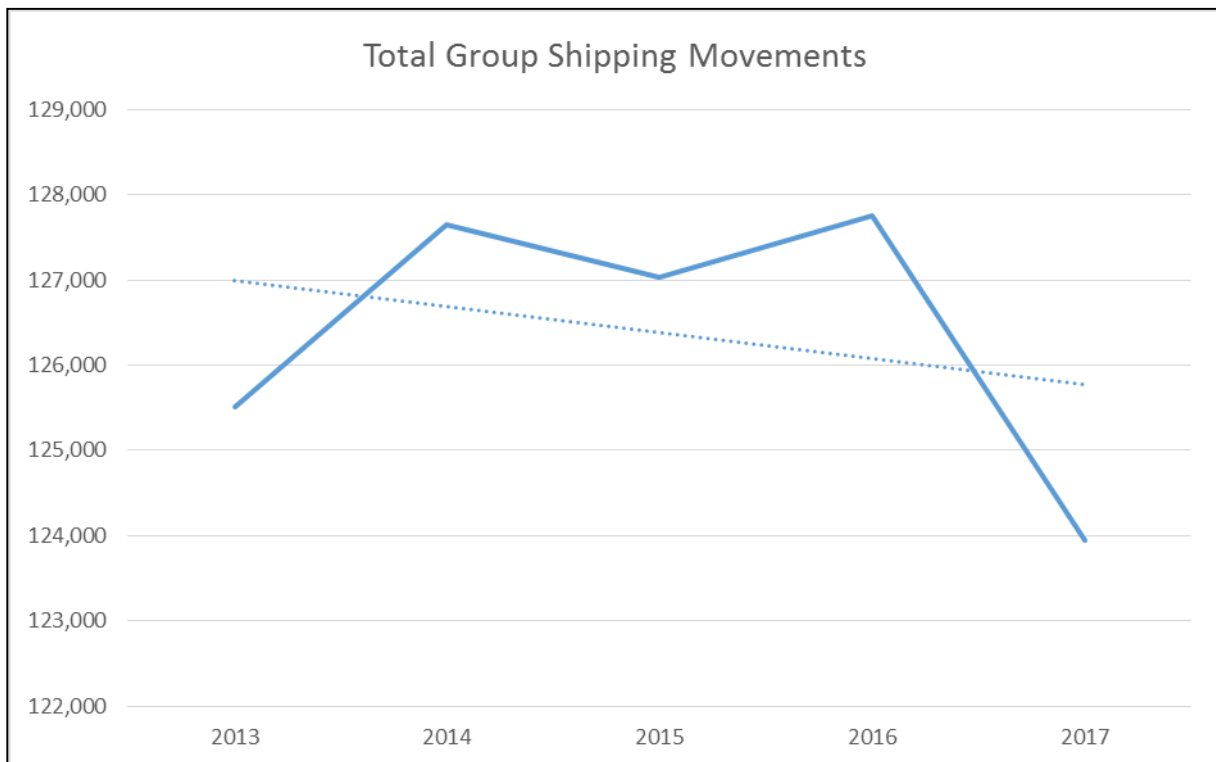


Figure 4: Shipping Movement Trend 2012 to 2017



Numbers of shipping movements have been collated from the ABP PAVIS system to ensure consistency between all the ports.

The statistics include only commercial movements and include both inbound and outbound passages, as well as transits through ABP Harbour authority areas to and from non ABP ports (mainly applies to Humber and Southampton).

Where a vessel moves from one ABP Harbour Authority into another (for example from HES into one of the Humber ports, the same vessel will generate a movement count for both ports on the same voyage.

Some ports may have a significant number of other vessel movements which are not recorded, especially small craft (including windfarm vessels and some categories of tug and tows). At present only Humber region records these moves, so for consistency they have not been included for **any** region in this report.

Furthermore, many ports have significant numbers of leisure vessel movements which cannot be feasibly recorded. This is particularly true in Southampton where leisure movements are so numerous that it is not possible to even estimate the total number with any degree of accuracy. However, incidents involving leisure craft may be recorded, especially if the incident is significant (threat to life etc.) or involves a commercial vessel. The majority of minor incidents involving leisure craft only, in any of our HA areas, are not notified to the Harbour Authority, and not therefore recorded.

ABP ports handled 127,033 shipping movements during 2017, with a significant majority being in Southampton and the Humber Estuary.

This represents a decrease of 727 shipping movements when compared with 2016

Further details of shipping movements per port are illustrated in Figure 8

*2017 continued to witness significant numbers of windfarm support vessel movements at several ABP ports, as well as regular visits from the latest generation of ultra-large container vessels and cruise ships to Southampton.*



## 6 Incident Statistics

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

Any incidents which occur are recorded and investigated. Such investigations will lead to reviews of the associated risk assessments, and 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 Port Marine Operational Procedures Manual 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. Particular emphasis is placed on reporting and recording potential incidents, which are investigated in the same way as actual events.

Incident numbers and trends are key indicators of the success of the Harbour Authority’s Safety Management System, and as a consequence incident numbers (both navigational safety and environmental) were reported in detail to the Harbour Authority at the bi-monthly SHA Board meetings during 2017.

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 2017, as well as trends over the last 5 years.

Figure 5: Nautical Safety Incident Trends (by incident type)

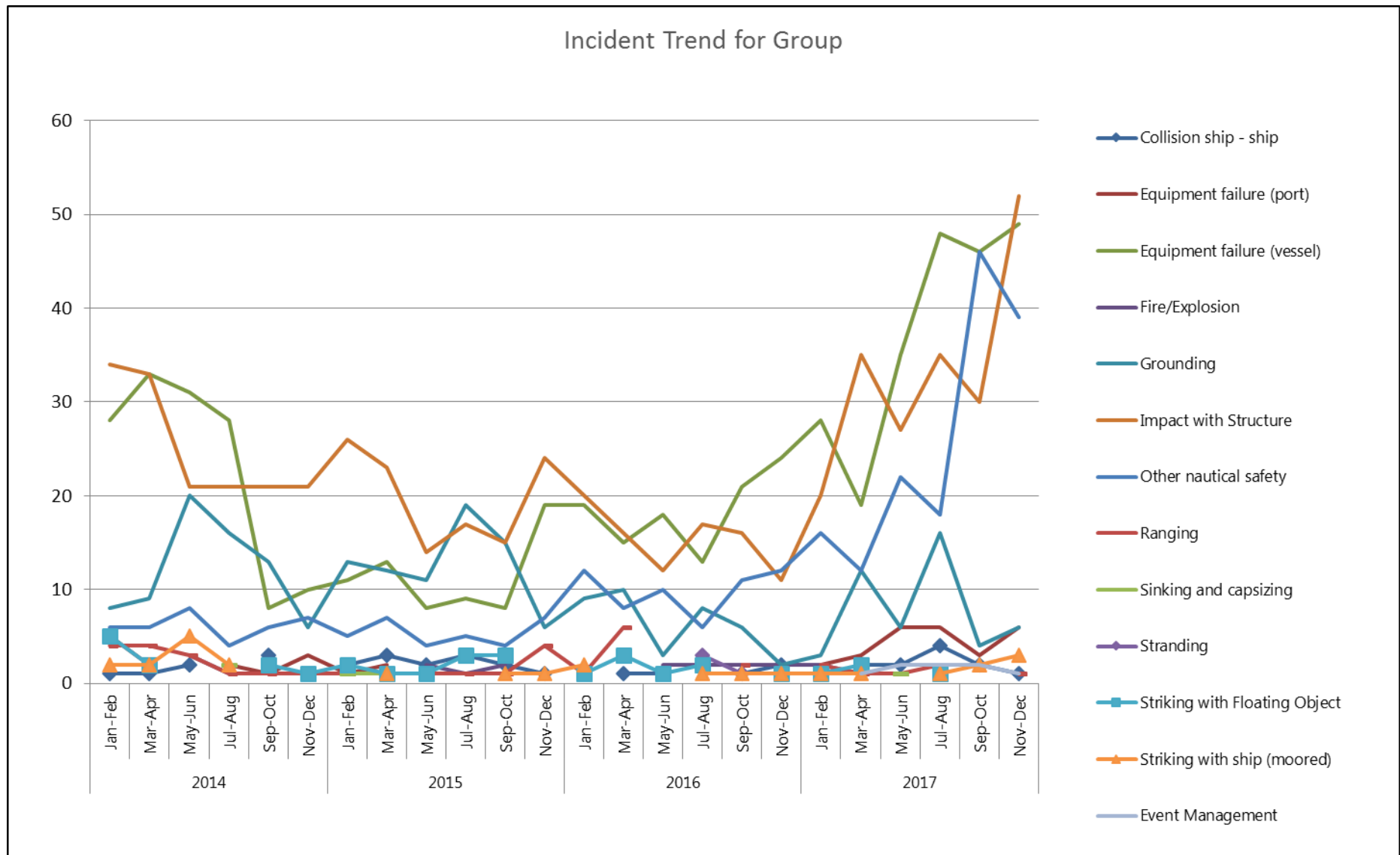




Figure 6: Total Incidents and Potential Incidents Trend

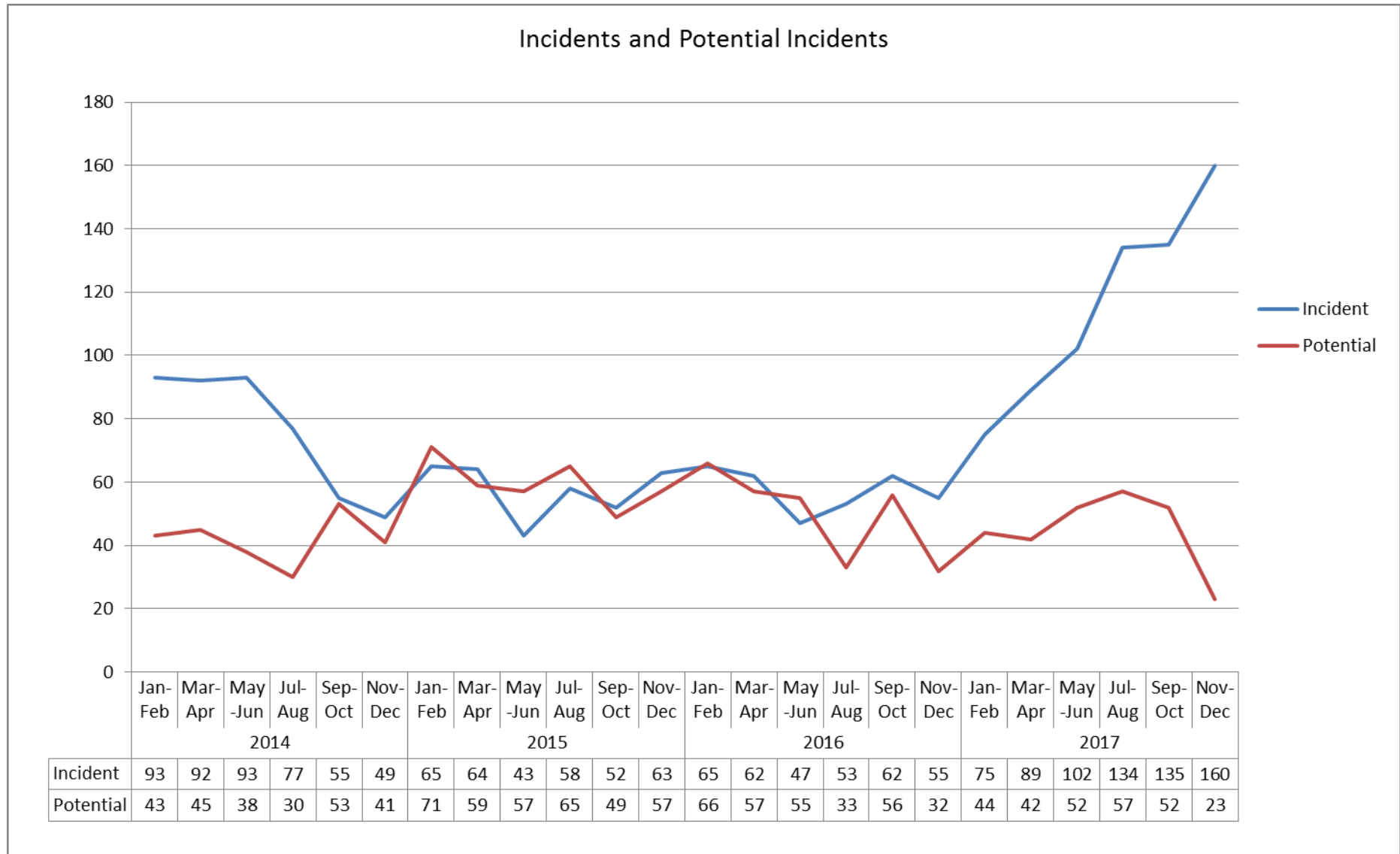


Figure 7: Incidents per 1000 Movements - Southampton and Group Trend

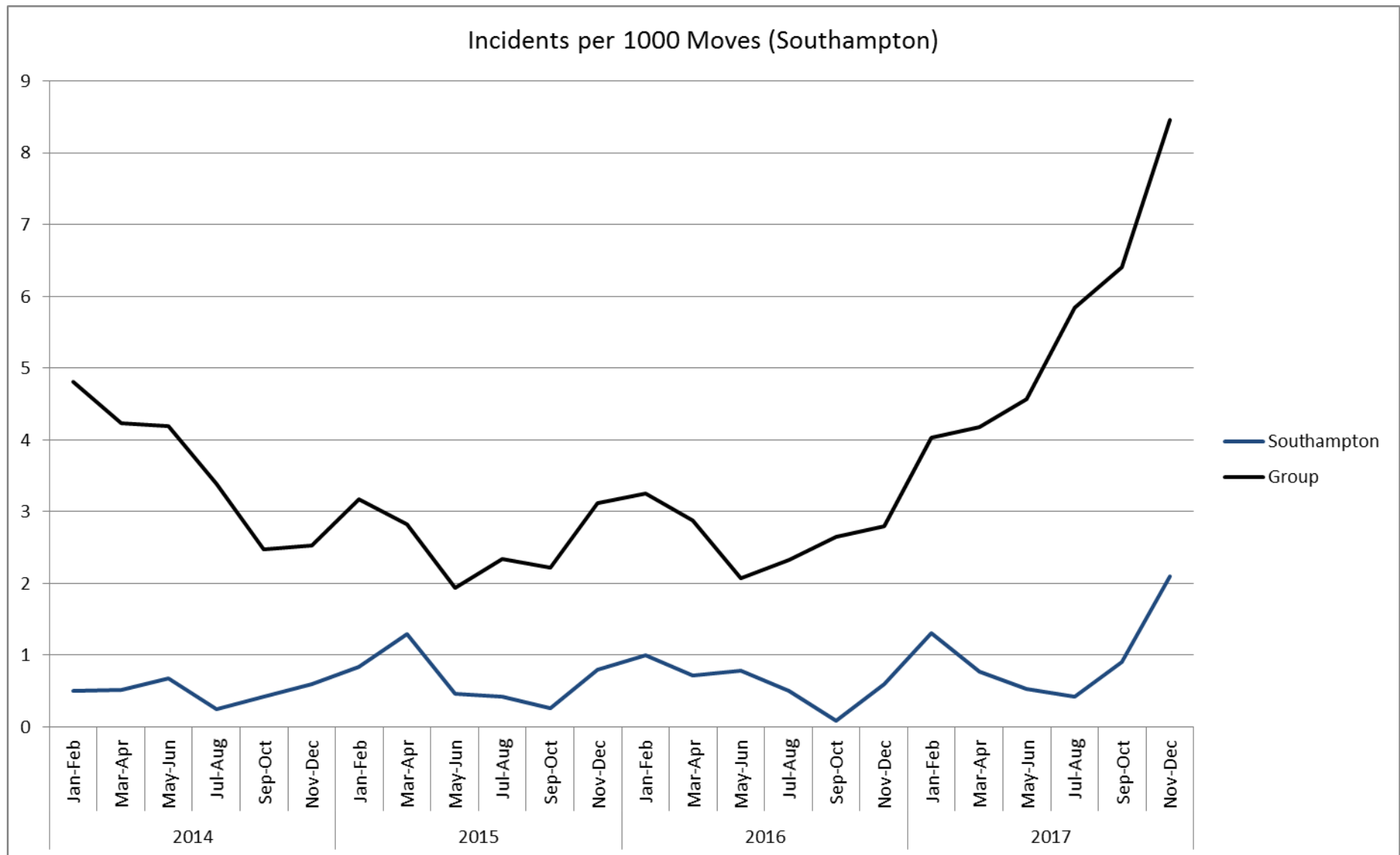


Figure 8: Incidents per 1000 Movements - Humber and Group Trend

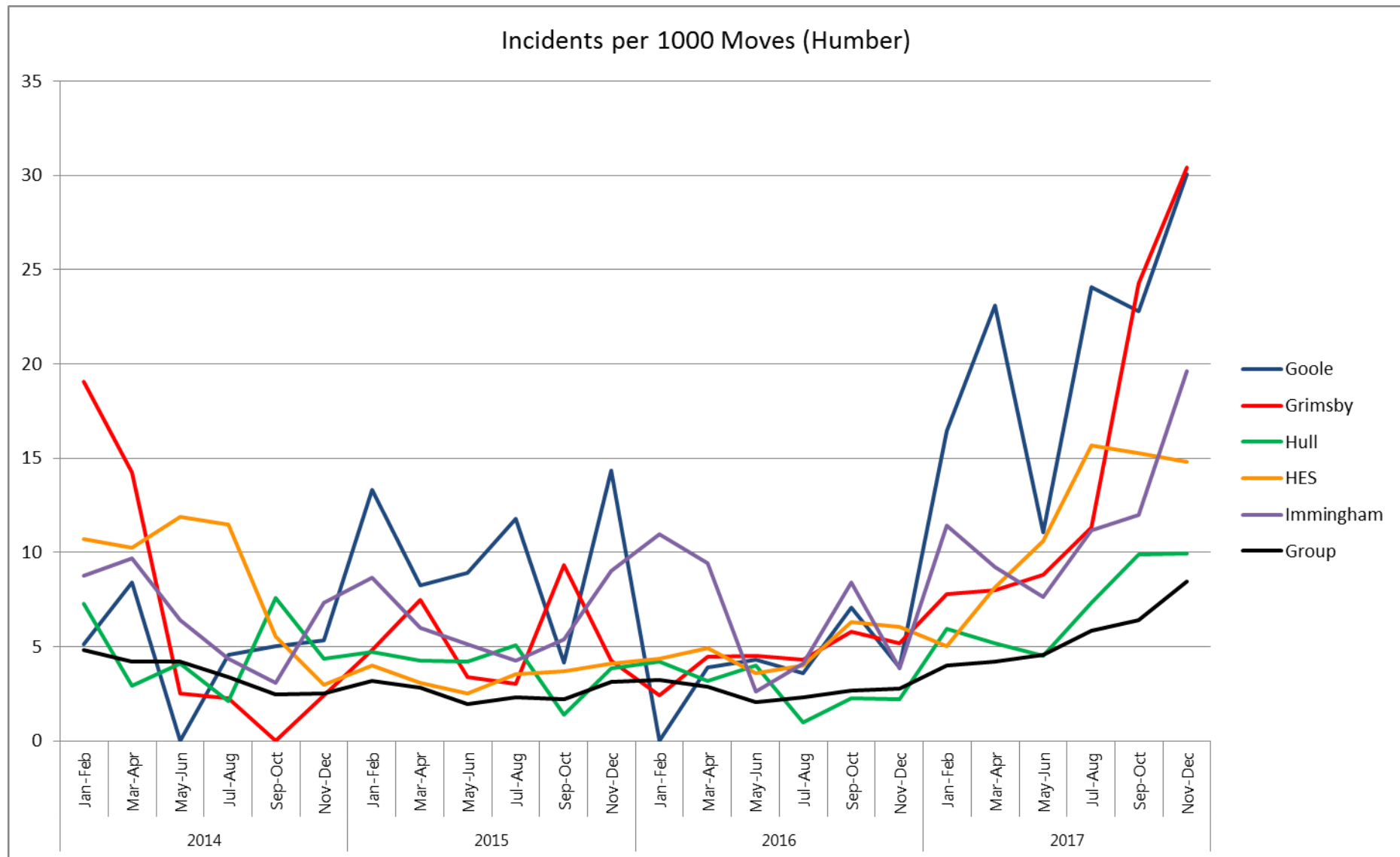


Figure 9: Incidents per 1000 Movements - South Wales and Group Trend

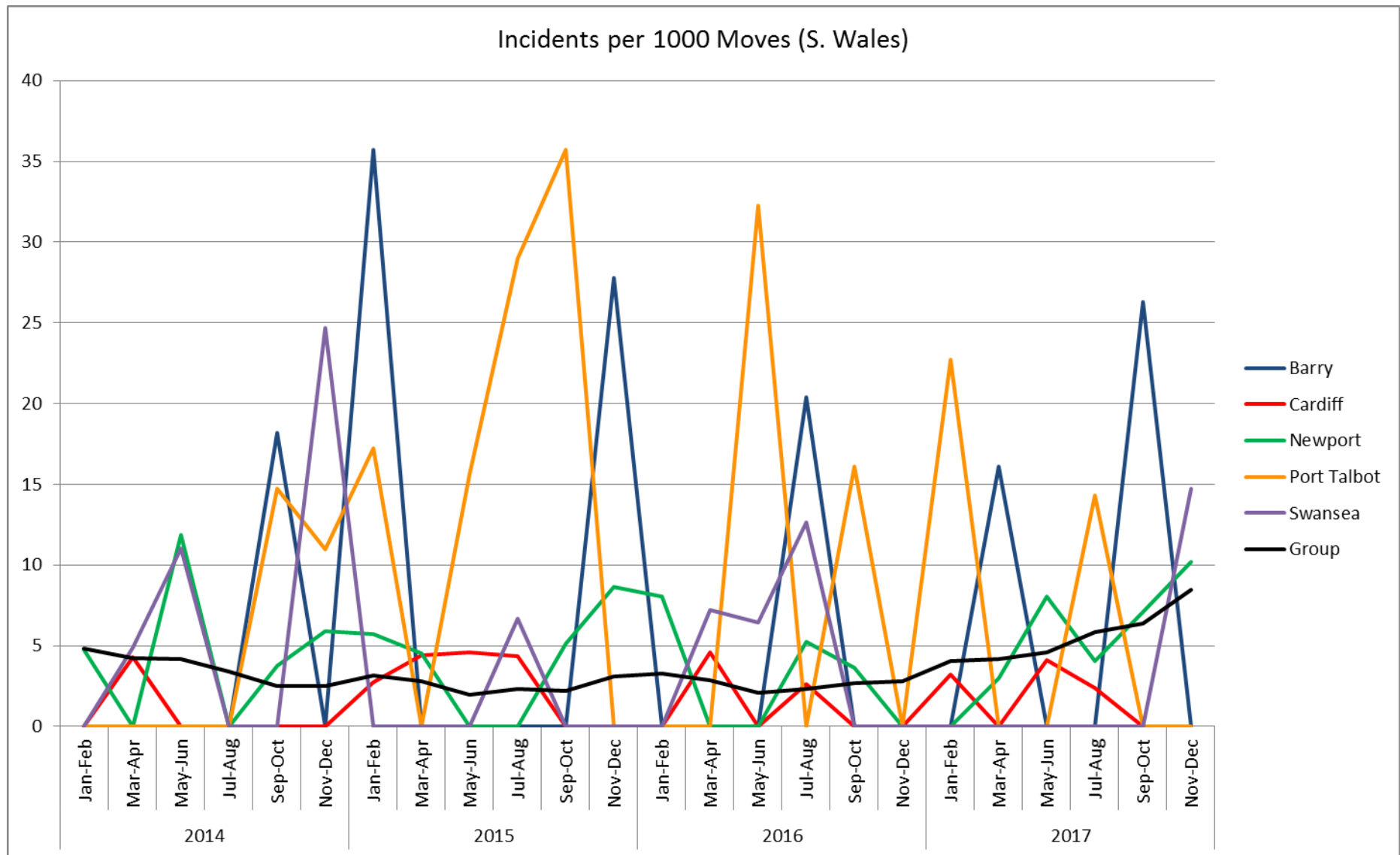


Figure 10: Incidents per 1000 Movements - Short Sea Ports and Group Trend

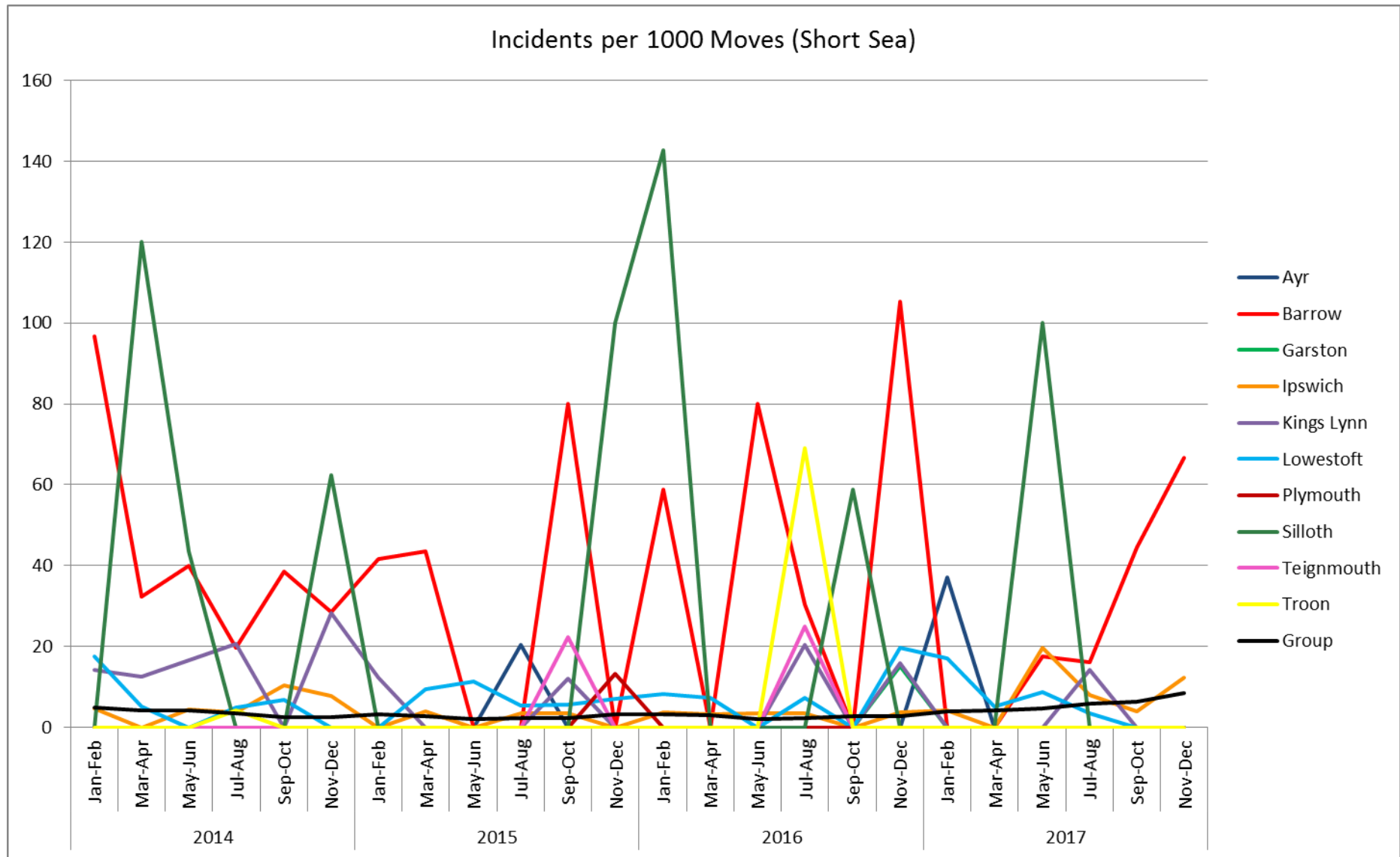
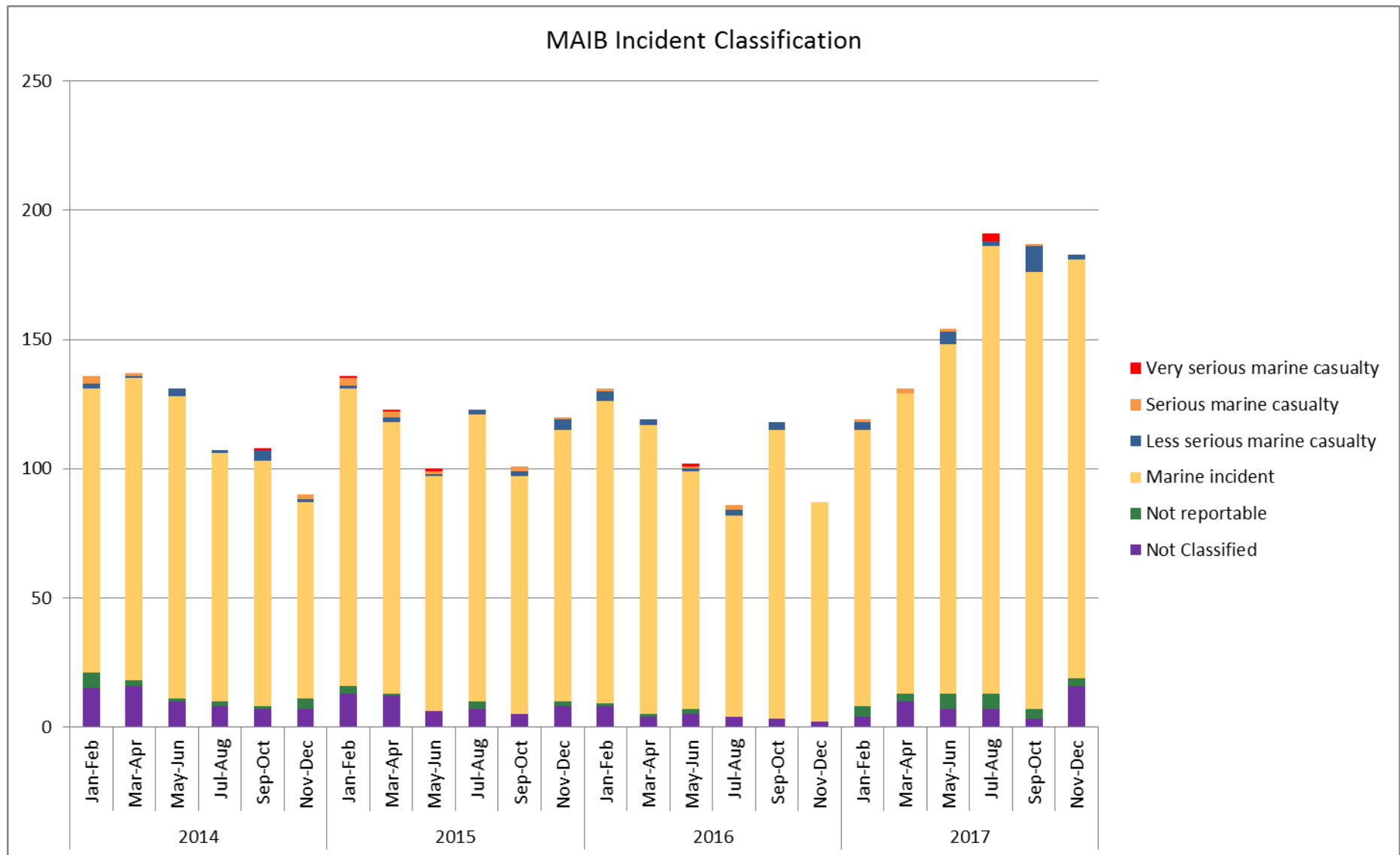


Figure 11: MAIB Incident Classification Trends





## 7 Key Performance Indicators

In addition to monitoring incidents as an indicator of historic safety performance, the ABP Harbour Authority have identified a number of other indicators which help identify potential problems before they occur, allowing procedures to be improved before any issues arise.

The Harbour Authority keep such indicators, and their presentation, under constant review.

The KPIs reviewed for the 2017 calendar year therefore included data to give the Board an insight into the following aspects of port marine safety:

- How actively each port is used (Section 5 of this report)
  - Shipping movement numbers (Shipping Movements by Region)
- Incidents and unplanned events (Section 0 of this report)
  - Navigational Safety incident trends (By type of incident and location)
  - Near Miss (potential Navigational incident trends)
  - The relationship between actual and potential incidents reported (potential divided actual to give a ratio, current target is 2 Potential reports for every actual incident reported)
  - The number of incidents per (1000) vessel moves at each location, to allow comparison between ports.
  - The “seriousness” of incidents, by reference to MAIB classification.

The Port Marine Safety Code seeks to ensure safety by means of thoroughly assessing marine risks, and implementing effective control measures before any incidents arise. However, the Code is clear that should incidents occur despite these control measures, they should be thoroughly investigated and the lessons learned applied through review of assessments and the introduction of new or revised controls.

The additional indicators shown below seek to give re-assurance that Risk Assessment and incident reporting / investigation is effective, and similar graphs were presented to the Duty Holder covering the two monthly period preceding each Board meeting during 2017.

- PMSC Compliance Indicators
  - Average risk assessment score (by port)
  - Risk assessment review activity by port, (Overdue Navigational Assessments)
  - Incident report status (number of open reports (by port)

*Key performance indicators do not confirm compliance with either the MSMS or the PMSC; rather they give timely and measurable indications of changes in trends, allowing more thorough investigation to be initiated should the indicator suggest negative impacts on navigational safety.*

Figure 12: Risk Assessments - Average Nautical Safety Assessment Score by Port (End 2017)

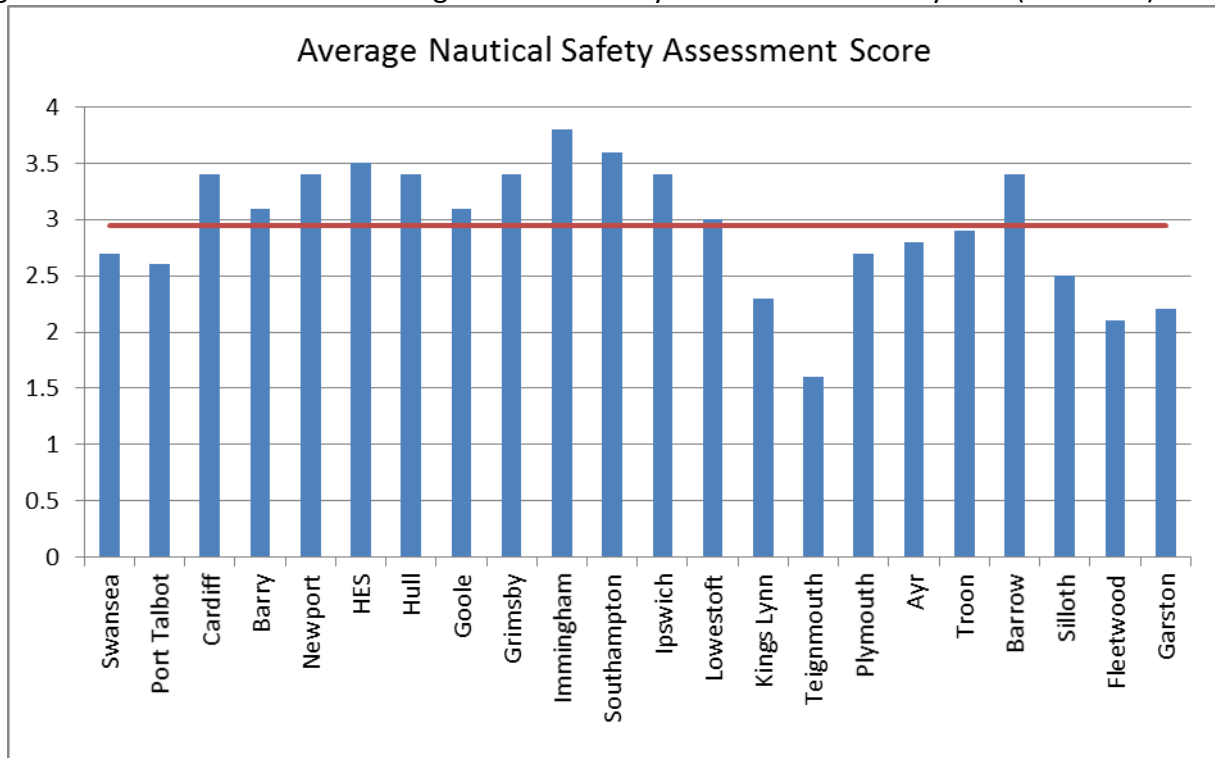


Figure 13: Incidents - Time to Resolve During 2017

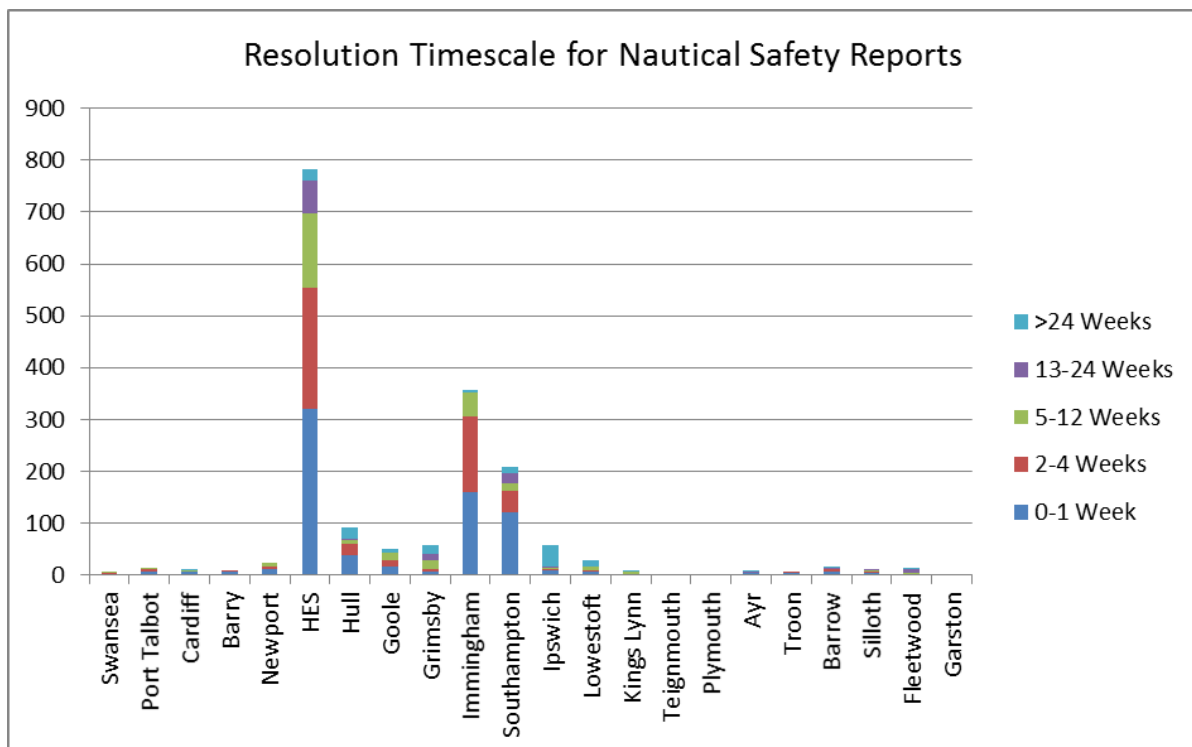


Figure 14: Mean Weeks to Close Incidents (2017)

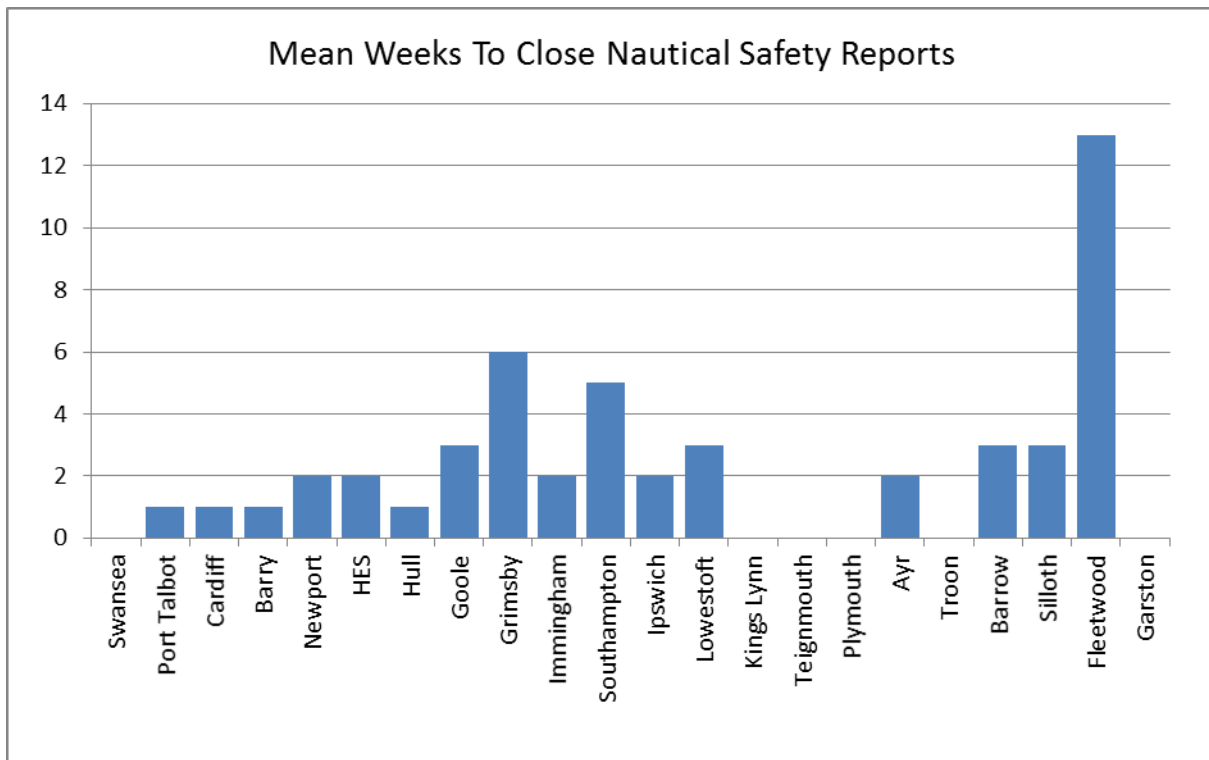
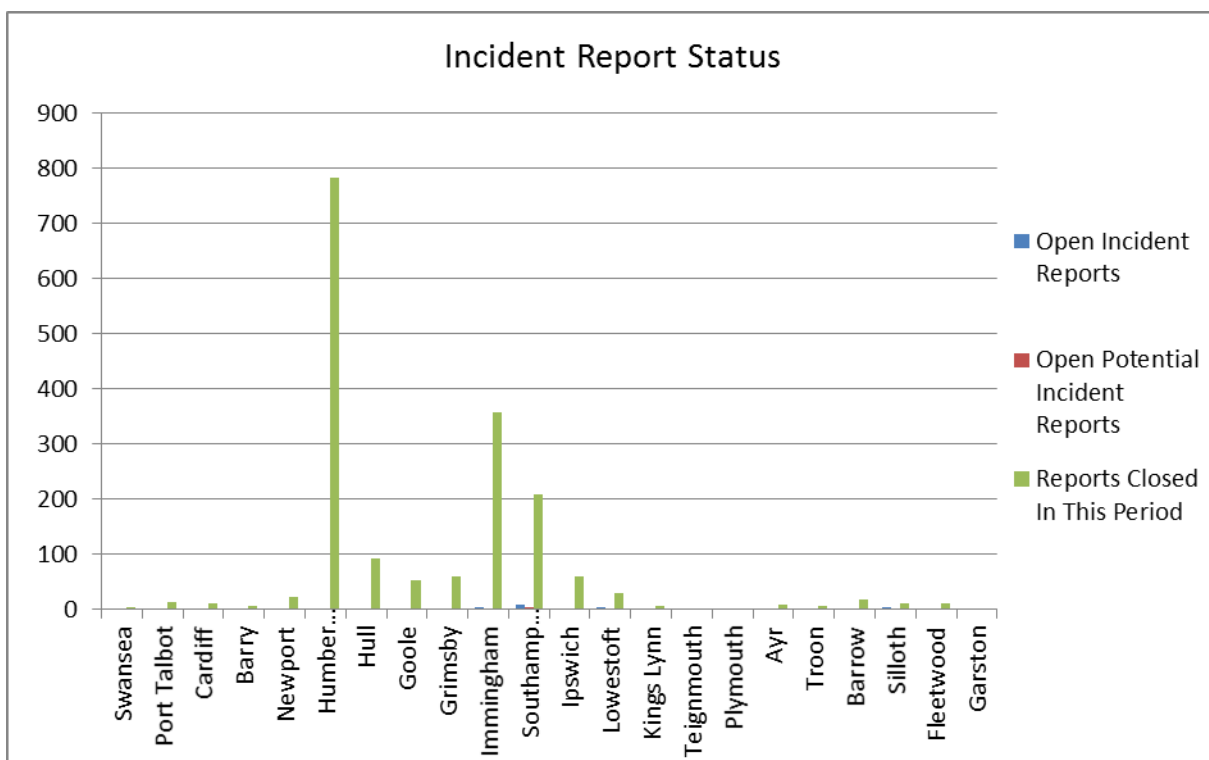


Figure 15: Incidents - Status at Year End (2017)





## **8 Commentary**

This report reviews the performance of the Associated British Ports Statutory Harbour Authority across 22 diverse ports and harbours. The report does not seek to replace more detailed reports produced at port and harbour level.

This report has drawn on the reports and data that were routinely collected to produce bi-monthly reports to the Harbour Authority meetings, as well as other data collected through ABP's MarNIS and PAVIS software systems.

A significant upward trend in incident reporting during 2017 was observed in the top three areas:

- Impact With Structure
- Equipment Failure Vessel
- 'Other'

This upward trend can be seen as originating in part from the Humber Estuary Services reporting incidents into MarNIS, when previously most reports were entered into PAVIS for equipment failures.

There was also an increased emphasis on reporting levels during 2017.

Current Mitigations include:

- Portable Pilot Unit Rollout (Impact with structure and groundings)
- More engagement with MCA (Equipment failure Vessel and 'other')
- Peer review of Navigation on the Humber (all areas of incident reporting)
- Dangerously weighted heaving line charge ('other')

### **8.1 KPIs**

The vast majority of data was extracted from the vessel information system "PAVIS" (shipping movements) and the specialist PMSC support software "MarNIS" (Incident data, risk assessment records). This data is critical to helping the harbour authority monitor its performance with making port marine safety.

With respect to traffic volumes, it will be noted that there has been a very slight downward trend over the last 5 years, though not particularly significant in Group terms. Of more significance is local variation. For example, in the larger regions (Southampton and Humber), there has not been a great variation in traffic volumes, but this masks the fact that vessels at those ports are becoming very much larger, especially with respect to Container and Cruise ships in Southampton. The smaller ports are seeing a general downward trend in traffic volumes, though this is offset at a few ports, generally those with windfarm traffic, which are seeing increasing volumes. In fact, traffic at those ports is even greater than indicated, as small vessel traffic (including many small windfarm support vessel movements) are not currently collected by the Pavis system. Future system upgrades are being designed within the Business Transformation Programme to capture all commercial movements, regardless of size.

The 'Incident trend Group' KPI for 2017 shows a steady rise in the reporting of both actual and potential reports (, in particular in the reporting categories of:

'other'

'Equipment Failure (Vessel)'

'Impacts with Structure'

'Groundings'

2017 also saw a significant drop in the number potential or near miss reports being submitted.

The Marine Safety Plan identified a target of increasing the number of potential reports relative to actual incidents to a ration of better than 2:1. Disappointingly this was not achieved by the end of 2017 despite a strong focus on potential incident reporting during marine meetings, and audit / support visits to each port.

KPIs describing Risk assessment and Incident investigation activity reveal that all 22 ports and harbours within the Group are active in reviewing and visiting their assessments, and are efficient at investigating and closing out incident reports. The end of year graphs included in this report can only give a snapshot of status, but these KPIs when presented at two-monthly intervals to the duty Holder are very useful in identifying any short term issues such as a backlog of assessment reviews, or delays in investigating and closing out incident reports.

## 8.2 Incidents

The PMSC requires all nautical safety incidents to be reported and investigated. The findings of the investigation should inform a review of all associated Risk Assessments and lead to improved or new control measures to help prevent re-occurrence of similar incidents in the future. ABP uses a group wide system (MarNIS) to manage this process and through shared access to the system and regular meetings of marine managers from all ports, lessons learned are implemented.

MarNIS also includes a tool for assessing whether incidents should be reported to the MAIB, by reference to the Incident reporting regulations. These regulations if applied correctly in fact assess almost all incidents as MAIB reportable, and therefore ABP makes a very significant number of reports on a daily basis. However, Figure 12: MAIB Incident Classification Trends clearly illustrates that the vast majority of these reports are "marine incidents". Many ports would not report these to the MAIB, even though the regulations now require that they do so. In order to reduce the workload on both ABP and MAIB staff, an automated email facility is in place to notify MAIB of all such incidents, at the end of each day after they are entered into MarNIS. Ports will still however make immediate verbal or email notifications for any of the marine casualty levels of incident, in addition to the automated email.

Equipment failure (vessel) continues to be amongst the top four categories of incident reported, especially with respect to potential incidents. The cause of these failures is often outside the control of the Harbour Authority, but whenever possible, action is taken such as calling in MCA surveyors to inspect vessel subject to failures. Impact with structure is also a significant incident type in terms of numbers, but this is largely accounted for by those ports with locks, where all impacts resulting in even minor damage are recorded and assessed to look for patterns. This has resulted for example, in reviews of fendering provision.



## 8.3 2017 Reviewed

The Technical Authority Marine visited all ABP ports during 2017, and completed audits of all locations with the respective Dock and Harbour Masters. The majority of Deputies, as well as other key staff were also involved during audits.

During 2017, audits changed focus from document reviews ensuring completeness of Marine Safety Management System components, to implementation of the systems. In particular the audits sought to verify that all marine staff had access to relevant parts of the system (Documents, procedures) and that those procedures were being followed. This was achieved by means of interviewing team members working on the quayside, harbour craft and in VTS control rooms, for example. In addition record keeping was assessed to ensure that documentary evidence was available to show that procedures were indeed being followed.

The audits continued to find many examples of good practice, with well-maintained and accessible safety management systems at all ports. There were still examples of good procedures being followed that were not fully documented, and most ports were able to improve their operations manuals accordingly.

However, there was concern that procedures were not sufficiently familiar to all staff (especially those procedures not used on a daily basis), and many operatives were unsure where to find information in the absence of advice from senior colleagues. There was however a notable improvement in ability and willingness of staff to search for (and successfully find) information stored electronically.

Additional visits were made to all ports as required by the Technical Authority Marine to offer extra support, training and advice – especially with review of Port Marine Operational Procedures Manuals; and in connection with MarNIS, for which training continued to be delivered as required.

A majority of senior marine managers also attended Incident Investigation and Reporting training to help improve the standard of investigations, and help the sharing of lessons learned.

During the year, 15 formal “Marine Advisor Notices” were issued to all ports. These covered such matters as safety alerts and standing instructions to be followed by all ports. All such notices were time framed, and where appropriate required specific responses to allow the MA to record that notices have been received, and required actions were followed up.

The 2017 Marine Conference was hosted by the South Wales region in Cardiff, and provided an opportunity for all ABP Harbour Masters and Deputies to meet and exchange best practice, as well as listen to presentations from external organisations. This was the second such event to which Board members were invited in their capacity as Duty Holder, which allows them to engage with marine staff, as well as contribute to discussions and learn from shared experience. The conference also provided an excellent opportunity to engage marine Staff in ABP’s “Beyond Zero” safety initiative.

## 9 Progress against Objectives Set in Previous Report

During 2017, the Marine Safety Plan identified 8 specific improvement targets and formalised future objectives and plans.

The table below describes those targets that formed the plan, and indicates progress against completion at the end of December 2017.

Target #	Description	Target	Time Scale	Progress at 31/12/2017
1	Keep KPIs under review and introduce new / relevant KPIs as appropriate	Monitor KPIs and review as required.	Annually	Last reviewed January 2017
2	To ensure consistent application / implementation of the MSMS across all ports	Successful annual internal audit at each location– audit actions closed within agreed timescales	Ongoing	On track
3	Review Marine Policy	Annual or as required by external factors	End each year	Reviewed policy dated May 2017 published June 2017
4	Review Marine Operations Manuals	Annual or as required by external factors	Annually	To be undertaken in line with issue of MSMS across group (Spring 2018)
5	Improve level of Potential Incident Reporting	To achieve a group wide ratio of two potential reports for every actual incident report made via MarNIS	End 2017	Not met, Ongoing emphasis required on Near Miss and Potential reporting
6	Harbour Directions	One port to have made Harbour Directions, or one port to have commenced an HRO to achieve better regulation of users.	July 2018	Working with Group Legal teams to achieve this.
7	Consolidated Port Operational Procedures Manuals	All ports to have their manuals in new format	End 2017	Ongoing
8	To volunteer for at least one MCA Health check per year	Formally contact MCA Ports Liaison Lead annually	End each year	Complete



## 10 Continuous Improvement Plan

In addition to publishing a Marine Plan identifying specific marine safety improvement targets, 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.

#	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 period, 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 actions not complete by due date.
8	Repeat Cycle Annually	

## 11 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 Authority were able to positively confirm their compliance with the requirements of the PMSC in a letter of compliance to the MCA in January 2018. The Marine Policy revised in May 2017 also describes how this compliance is achieved.




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On behalf of ABP Harbour Authority




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Date 2706/2018

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