

Ports & Marine Facilities Safety Code Marine Safety Plan 2025 – 2028

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Foreword from CEO



I am pleased to introduce ABP's Marine Safety Plan for 2025–2028, which sets out our approach to delivering safe and effective marine operations across our ports in alignment with the Ports and Marine Facilities Safety Code (PMSC) 2025 and the associated Guide to Good Practice.

As the UK's leading port operator, we are proud of our strong marine safety record. It reflects the professionalism and dedication of our people and the robustness of the systems we have developed to manage marine risk. However, we recognise that the shipping industry, the regulatory environment and operational demands are constantly evolving.

New vessel types, technologies, environmental expectations and trading patterns all present opportunities and new challenges. That is why we're continually striving to make our ports as safe as they can be, adapting and improving our policies, procedures and culture to ensure we meet the highest standards.

This Marine Safety Plan outlines how we will approach that over the next three years, with a clear focus on risk management, stakeholder engagement, investment in training and the continuous refinement of our Marine Safety Management System (MSMS).

On behalf of the Harbour Authority and Safety Board (HASB), I want to thank our Harbour Masters, marine professionals and port user community for their commitment to safe navigation and port operations. Together, we will continue to ensure that safety remains at the heart of everything we do and that everyone gets 'Home Safe – Every Day'.

Henrik L. Pedersen
Chief Executive Officer - Associated British Ports

What is the Ports and Marine Facilities Safety Code?

The Ports and Marine Facilities Safety Code (PMSC) sets out a national standard for every organisation or person that has marine safety obligations within UK ports, harbours and other marine facilities.

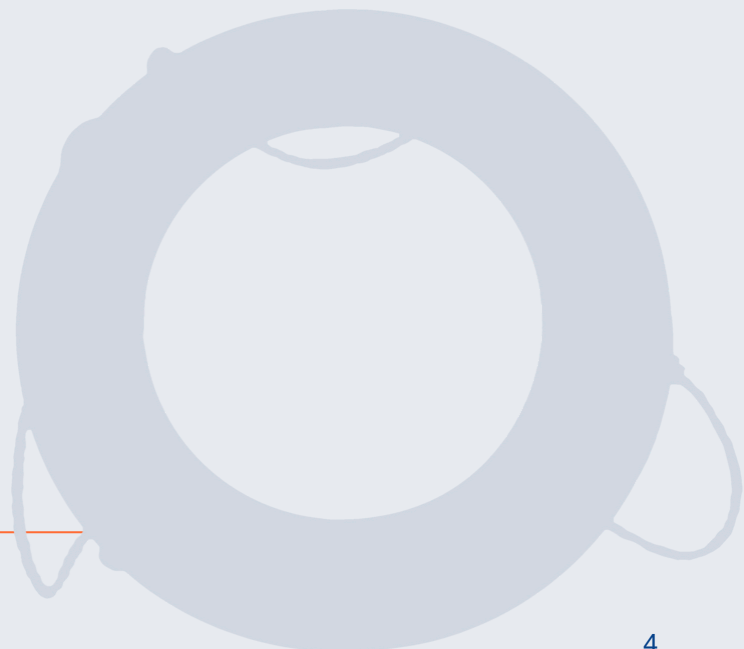
First published in 2000 and most recently updated in 2025, the code is voluntary but strongly endorsed by the UK Government. It applies to all Statutory Harbour Authorities (SHAs) and other organisations with marine responsibilities, regardless of size or commercial focus. ABP is responsible for 22 SHAs across 21 ports.

At its core, the PMSC requires duty holders to ensure that all marine operations are:

- Safe;
- Properly risk-assessed;
- Carried out by competent people;
- Continuously reviewed and improved.

The code is supported by the Guide to Good Practice on Port Marine Facilities (GtGP), which provides detailed practical advice on how to meet its expectations.

The ABP Duty Holder known as the Harbour Authority & Safety Board (HASB) has published a Marine Policy, confirming commitment to compliance with the PMSC. The latest version of the policy can be downloaded from the ABP website.



Marine Safety Plan

A Marine Safety Plan, as required by the PMSC, is a structured document that outlines how a port or harbour authority ensures safe marine operations while complying with regulatory standards. The PMSC mandates that every three years, a safety plan must be published, detailing how the authority meets the requirements and assesses performance against the plan.

Development of the Marine Safety Plan - The ABP Marine Safety Plan 2025–2028 has been developed to ensure the safe and effective management of marine operations across our ports and is structured to address evolving industry challenges, regulatory updates and operational best practices, ensuring continual improvement in marine safety management.

Approach to Plan Development - The plan was developed through a structured process, addressing operational risks, stakeholder expectations and industry best practices. A full review of regulatory requirements was undertaken, assessing statutory obligations under the Harbours Act 1964, Merchant Shipping Acts and related conventions. This was followed by an extensive evaluation of incident trends, near-miss reports, audit findings and proactive hazard identification to ensure risk mitigation follows the As Low As Reasonably Practicable (ALARP) principles.

Engagement with Harbour Masters, Port Managers, regulatory bodies and industry stakeholders formed a critical part of the development process, with discussions focused on navigational safety, emergency preparedness, pilotage services and conservancy duties.

A key component of this process was the development of metrics and Key Performance Indicators (KPIs), designed to track performance, identify safety improvements and provide measurable accountability. These metrics and KPIs were refined to ensure their relevance, achievability and ability to support regulatory compliance.

Commitment to Continuous Improvement - The ABP Marine Safety Plan 2025–2028 is not a static document. It is designed to evolve alongside operational requirements, industry advancements, and safety expectations. A cyclical review approach will ensure the plan remains relevant and effective, with regular audits and stakeholder engagement driving real-time refinements and process enhancements. To maintain transparency and accountability, ABP will publish an annual performance report detailing progress against our KPIs. This will ensure continuous evaluation of marine safety standards, identify areas for improvement, and demonstrate ongoing compliance with the PMSC.

ABP's Marine Safety Plan 2025-2028

Key components of ABPs Marine Safety Plan, **across our 21 ports**, under the PMSC include:

- **Safe Marine Operations.**
- **Risk Management.**
- **Safety Governance & Compliance.**
- **Training and Competence.**
- **Emergency Preparedness.**
- **Stakeholder Engagement.**
- **Safety Culture & Continuous Improvement.**

ABP is committed to the principles of the PMSC, ensuring that all marine operations are conducted safely, with clear accountability and continuous improvement at their core.

ABP has also published its continuous improvement plan, which outlines the process adopted to ensure that the Group continues to improve compliance with all aspects of the PMSC. The Continuous Improvement Plan supports this Marine Safety Plan (see appendix).

ABP commits to:

Safe Marine Operations including:

Pilotage & Vessel Traffic Services (VTS) or Local Port Services (LPS) where appropriate and determined by risk assessment:

- Standardised pilot training and certification programs.
- Real-time VTS monitoring for enhanced navigational safety.

Conservancy & Environmental Protection:

- Proactive hydrographic data acquisition for safe navigation.
- Maintenance of Aids to Navigation (AtoN) and dredging operations.

ABP's Marine Safety Plan 2025-2028

A Risk Management Framework which includes:

Hazard Identification & Mitigation:

- ABP conducts structured risk assessments following ALARP (As Low As Reasonably Practicable) principles.
- ABP continually monitors of navigational hazards, vessel movements, and environmental risks.

Incident Reporting & Investigations:

- ABP uses standardised protocols for near-miss reporting, incident analysis, and corrective actions striving for a 3:1 ratio of Near Miss[1] reporting to Incident reporting.
- ABP practices transparent stakeholder engagement in post-incident reviews seeking to learn lessons and implement procedures and mitigation to prevent reoccurrence.
- ABP commits to close out initial incident investigations within 30 days of occurrence and share actionable outcomes across the Group to prevent reoccurrence in line with PMSC GtGP expectations.

Emergency Preparedness:

- ABP operates tiered response mechanisms for marine emergencies, oil spills, and vessel incidents to reduce impact of all activities in our ports to the absolute minimum.
- ABP conducts regular drills and training exercises to enhance operational readiness and to ensure our personnel are best prepared for all eventualities.
- ABP strives to conduct at least 1 multi-agency marine emergency exercise each year with lessons shared across the Group.

Safety Governance & Compliance which includes:

- **Duty Holder Oversight:** Ensuring collective accountability for marine safety.
- **Designated Person (DP) Assurance:** Independent oversight of the Group's Marine Safety Management System (MSMS).
- **Regulatory Adherence:** Compliance with **Harbours Act 1964, Merchant Shipping Acts, and international conventions.**

Effective Training and Appropriate Competence Levels: Ensuring marine personnel maintain high competence levels critical for safety, compliance and efficiency is achieved by:

- **Certification & Compliance:** Mandatory training, onboarding programs and adherence to IMO, IALA and UK maritime standards.
- **Continuous Professional Development (CPD):** Annual competency assessments, skill workshops, and leadership training for Harbour Masters and marine personnel.

[1] A near miss is an unplanned event or hazardous condition in a marine environment that did not result in injury, damage, or environmental harm—but had the potential to do so if circumstances were different.

ABP's Marine Safety Plan 2025-2028

- **Emergency Preparedness:** Scenario-based drills, multi-agency exercises, and proactive incident prevention strategies.
- **Technical & Digital Competency:** VTS system training, digital audit processes and updates on emerging maritime technologies.
- **Performance Monitoring:** Competency tracking, stakeholder feedback and lessons learned from audits and investigations.

Stakeholder Engagement: Collaboration with maritime operators, regulators and local authorities ensures marine safety and compliance. We achieve this through:

- **Industry & Regulatory Partnerships:** Regular consultation with MCA, local authorities and shipping operators to align safety standards.
- **Operational Collaboration:** Joint initiatives with pilotage services, tug operators and leisure users to enhance risk management.
- **Community & Public Engagement:** Clear communication with recreational users and local businesses on navigational safety responsibilities.

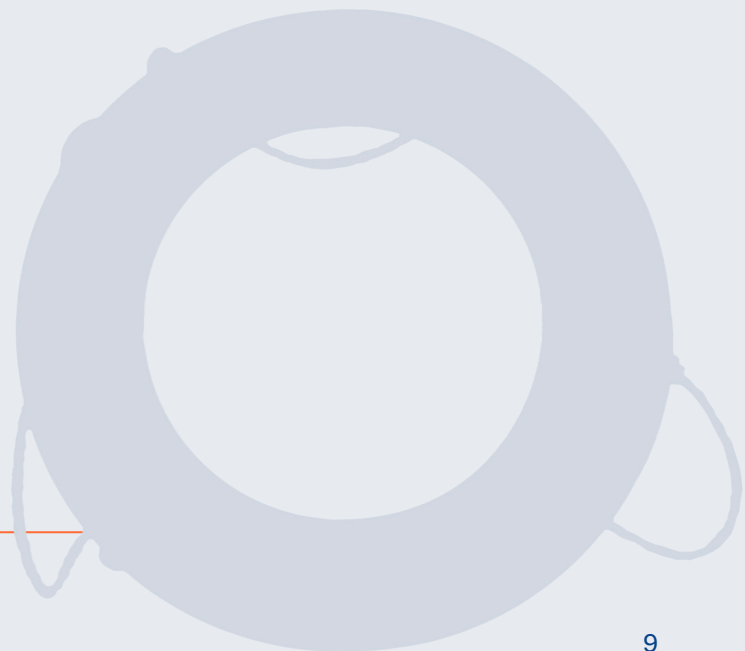
Safety Culture & Continuous Improvement: A strong culture driving proactive risk management and operational excellence is promoted through:

- **Training & Leadership:** Competency assessments, workshops, and incident response exercises to reinforce safety awareness.
- **Incident Reporting & Learning:** Clear near miss reporting protocols, corrective action tracking and lessons learned integration.
- **Audit & Performance Review:** Regular audits, KPI monitoring, and benchmarking against industry best practices to refine safety strategies.

Measuring Our Performance

ABP will monitor the effectiveness of this plan through:

- **Key Performance Indicators (KPIs) (see later):** To track metrics such as incident rates, training completion, and audit findings.
- **Regular Audits:** Conduct internal and external audits to assess compliance and identify areas for improvement.
- **Continuous Feedback:** Solicit feedback from stakeholders to refine safety practices and address concerns promptly.



Measuring Our Performance

ABP Marine Safety Plan 2025–2028: Metrics and Key Performance Indicators (KPIs)

KPI Area	KPI	Target
Marine Incident Reporting	Near Miss to Incident Ratio	≥ 3:1 by end of 2026
	Continue to maintain a focus on the use of dangerously weighted heaving lines and defective pilot ladders	Ensure data around these incident categories are captured and reported through to MCA, engage with ship's crew
PMSC Audit Compliance	% of ports audited internally/externally	100% internal annually; 100% external triennially
Safety Critical Training & Competence	% of marine staff completing training matrix requirements	100% annually
Stakeholder Engagement	Stakeholder Engagement Effectiveness	Annual formal engagements with stakeholders, operators, port users and maritime partners to review compliance with PMSC and regulations.
Risk Management	Risk-Assessment Implementation Effectiveness	Overdue Risk Assessments per year (rolling) to be 0%
Conservancy Duty (Aids to Navigation (AtoN))	In a 3-year rolling period - Category 1 AtoNs ≥ 99.8% uptime	99.8%
	Category 2 AtoNs ≥ 99.5% uptime	≥ 99.5%
	Category 3 AtoNs ≥ 98.8% uptime	≥ 98.8%
Emergency Response	Emergency Drill Readiness	Percentage of planned emergency response drills completed per year to be 100%
PEC Oversight	Annual renewal of all Pilotage Exemption Certificates	Review and renewal (where appropriate) to be 100% annually
Port Open Durty	ABP Ports to remain open for the year, except when weather or situations outside the company's control dictate otherwise [2]	Cumulative days closed to exceed no more than 3 in each port.

[2] Suspension of pilot boarding and landing for safety reasons remains outside of this process

Appendix – Audit and Continuous Improvement Plan

ABP as Harbour Authority for 21 ports and 22 Statutory Harbour Areas seeks to continuously improve the Authority's compliance with the requirements of the PMSC and reduce foreseeable risks associated with ABP's marine operations to the lowest practical level (ALARP). This Audit and Continuous Improvement Plan outlines the process used to monitor ongoing compliance and facilitate continuous improvement towards best practice in marine operations across ABP group ports.

The improvement plan will be cyclical in nature and follow the sequence below:

#1	Task	Detail
1	Plan Audit Schedule	Publish the annual audit schedule each December via an ABP Marine Information Notice. This schedule should include planned audit dates and any thematic areas of focus for the coming year.
2	Undertake Audits	Carry out audits at each port in line with the published schedule. Audits should include follow-up on previous action points, address themes identified at other ports or by external bodies (e.g. MCA, MAIB), and provide on-site support and guidance.
3	Identify Actions and Best Practice	Document clear action points and areas for improvement following each audit. Identify and record examples of best practice that can be shared across the wider ABP network.
4	Report Finding	Produce a concise written report summarising audit findings and recommended actions. All actions should be SMART (Specific, Measurable, Achievable, Realistic, and Time-bound).
5	Share Learning and Best Practice	Disseminate key findings and best practice through appropriate channels such as Marine Information Notices, MSMS updates, through the Marine Steering Committee, or conference presentations.
6	Monitor Progress	Regularly review the status of open actions. Prompt responsible individuals for updates and ensure actions are closed out on or before their due dates. Escalate overdue items where necessary.
7	Annual Review and Reset	At year-end, review the effectiveness of the audit and improvement cycle. Use lessons learned to inform the next year's audit schedule and continuous improvement priorities.