ABP | ASSOCIATED BRITISH PORTS

Port Marine Safety Code

Annual Performance Review

Year ending 31st December 2019

BEYOND ZERO

Contents

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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 2019, by means of reviewing incident trends, 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 strives for *consistent* compliance with the code and this report illustrates some examples of how that vision is being 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 of focus for such improvements.

Marine Policy

The Marine Policy was reviewed in September 2019 as part of an annual review. Changes were mainly minor and included:

➢ Harbour Authority board updated to reflect re-structure
➢ Requirement for board members to undertake PMSC refresher training set to 3 years, to help align with our requirement to send a PMSC compliance letter to MCA every 3 years
➢ MCA included in incident reporting requirements (as well as MAIB)

Audit and Verification

The Marine audit plan for 2019 was successfully achieved with 21 internal and 2 external Marine audits being undertaken throughout the year. Internal audits identified several areas for improvement including:

➢ Compliance with Marine Training Matrix
➢ Review of Navigational risk assessments, post incident occurring
➢ Review of Marine Safety Management System, particularly sections where group content has been amended
➢ Documented procedures and evidence of reporting ship related defects to MCA

The two external audits were undertaken at HES and in Southampton. Both were seen to be compliant with the PMSC, however the Southampton report identified the following areas for improvement:

➢ Marine Safety Management System updates (local procedures aligned with Group policies)
➢ Management of navigational risk assessments
➢ Hosting of Marine SMS (not user friendly, document control issues)
➢ Marine Staff resourcing

The following four-point improvement plan has been produced to address these areas:

1. Risk Assessment hazard ID workshop & Marnis Training workshop

2. Full review of Marine SMS

3. Migrate all Marine SMS content onto SharePoint site

4. Confirm Marine staffing structure provides appropriate resource address

Vessel Movements

ABP handled **125,225** vessel movements throughout 2019 which was slightly up on 2018s movements which numbered **124,757**. A significant majority of these movements are on the Humber Estuary and in Southampton. The percentage break down per region is as follows:

Humber: 38.6%
Southampton: 53.7% (approx. 23% of which are regular ferries to the Isle of Wight)
South Wales: 3.1%
Short Sea Ports: 4.4%

Incident Statistics

Marine teams across ABP submitted a total of **629** marine incident reports throughout 2019 (these include both incident reports and near miss reports)

The marine reporting system at ABP can be considered mature from a cultural perspective with most incidents or near misses being consistently reported by staff. Work throughout the year has revealed however that emphasis is still required in some areas on helping staff to understand what type of scenarios / incidents need to be reported, e.g. line partings.

The below graph shows a count of the top six most reported incident categories and shows a gradual decline in most incident categories over the last three years with the exemption of pilot ladder and heaving line reports which were introduced as new reporting categories in 2017 / 2018.

Annual Incident Counts (6 most frequent)

Legend: Collision ship - ship, Grounding, Impact with Structure, Equipment failure (vessel), Weighted heaving lines, Pilot ladder defects
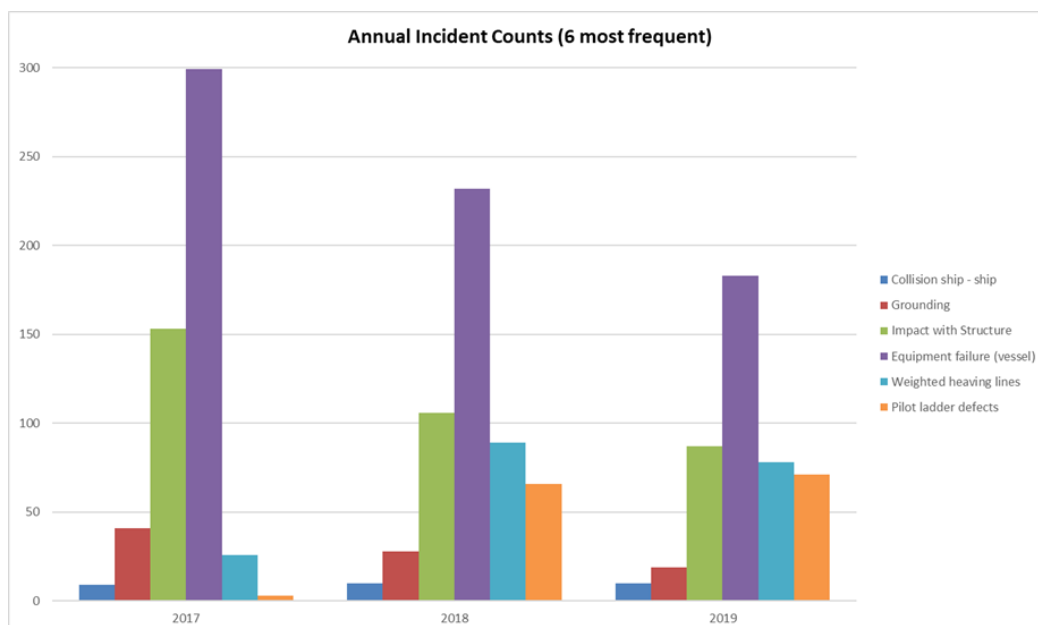
Commentary and Continuous Improvement

In general, the trend in marine incident reports is downward (aside from Pilot ladder and heaving line reports which have recently been introduced) when compared to 2017 and 2018. The highest frequency of reported marine incidents is the category of Equipment Failure (vessel), which covers a wide range of ship related defects which are managed as they present themselves, usually with towage and also support from port state control and the Maritime and Coastguard agency. ABP continue to engage with MCA on various steering and working groups.

2019 saw a specific study into this group of Equipment failure (vessel) reports and determined that general cargo vessels of **50 – 100 metres** in length attract the largest proportion of equipment failure (vessel) reports and that most of these reports stem from **engine or steering gear failures**. This analysis is particularly noteworthy in our smaller ports or terminals where the majority of trade to these locations are on small 50 – 100 metre general cargo vessels.

This analysis has helped us to better understand the risk profile of specific ship types and sizes and will assist with Navigational risk assessment reviews.

In May 2019, the Marine Training Matrix was reviewed and re-issued. This document helps to match competency requirements with specific marine job roles. This matrix is now linked with the Academies My HR solution to assist in tracking individuals progress against training plans. 2019 also saw the development of the following training / syllabuses to align with the requirements of the Marine Training Matrix:

➢ Mooring and Berthing Training Syllabus
➢ E-Learning - Knowledge of Hydrographic Surveying Management
➢ E-Learning - Knowledge of Harbour Conservancy and Licensing Management and procedures
➢ E-Learning - Knowledge of local dredge management
➢ E-Learning - Environmental awareness
➢ E-Learning - Managing Waste from Ships within the Port
➢ E-Learning - Port Facility Security Awareness / Management

Much emphasis continued during 2019 in areas of mitigation around dangerously weighted heaving lines and dangerous or defective pilot ladders. The below graph shows the monthly count of both incident categories. Whilst we continue to see monthly variation, the focus and resource on highlighting these themes continues as summarized below:

Dangerously Weighted Heaving Lines
Mitigations:

➢ ABP continue to levy a £1000 charge on vessels found to be using dangerously weighted heaving lines
➢ Dangerous heaving lines are removed by Marine teams and replaced with compliant 'bean bags'
➢ Marine Advisor Notice issued with a poster highlighting risks which pilots are delivering onboard vessels
➢ Industry Associations have highlighted issues with a letter to MCA and in nautical media
➢ Letters sent to management of ship owners by Marine Advisor
➢ Reports sent to MCA as part of national reporting regime for review of enforcement action

Defective Pilot Ladders

Mitigations:

- ➢ Pilots are empowered to refuse to board vessels with unsatisfactory or unsafe boarding arrangements
- ➢ Vessel movements maybe delayed or cancelled if non-compliant pilot boarding arrangements are observed and cannot be rectified
- ➢ Reports of defective pilot ladders are passed onto MCA for port state control action
- ➢ ABP supported a safety campaign to highlight the issue to ships crews via the creation of a calendar
- ➢ ABP are now sharing all defective pilot ladder reports with MCA and UK Marine Pilots Association which contributes to data gathering at a national / international level and aids campaigning
- ➢ Requirements to use compliant boarding arrangements highlighted during pre-arrival notifications

Heaving Line and Pilot Ladder Defect Reports 2019
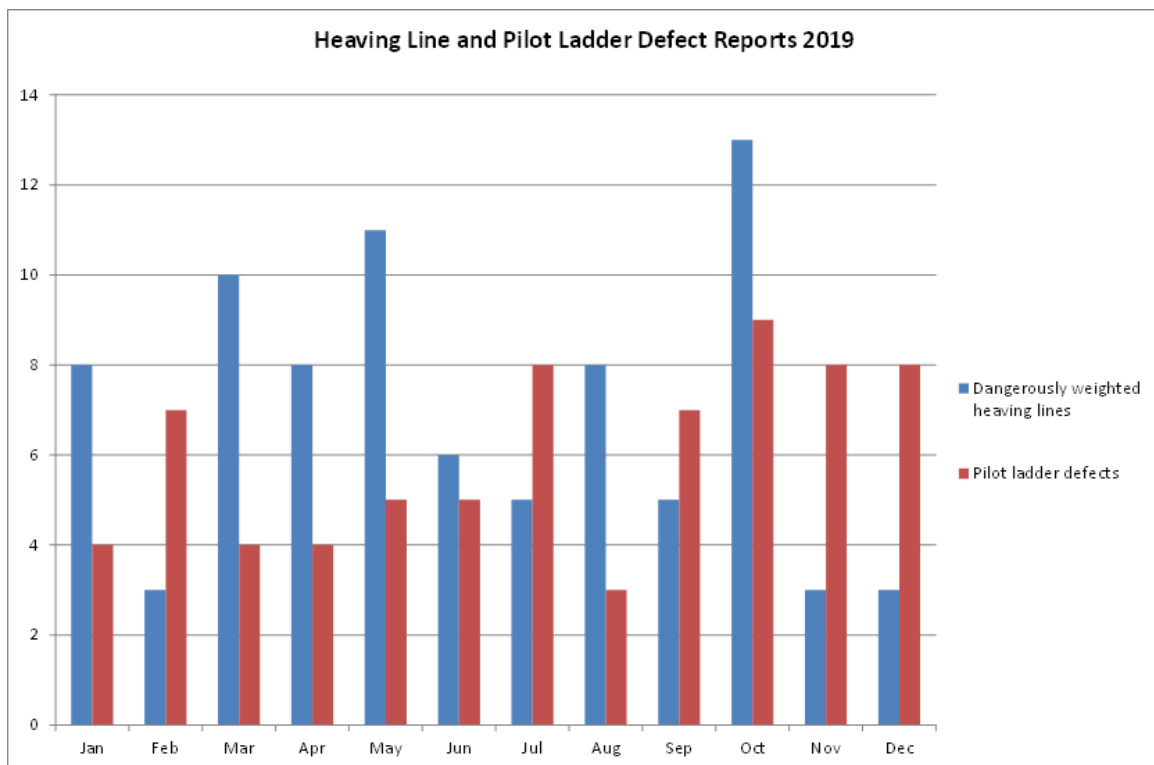
2   Introduction: ABP as Harbour Authority

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:

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 **2019**, 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 last revised during September 2019. 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 way this policy is to be locally implemented.

3.2   Audit and Verification
During 2019 the Technical Authority Marine maintained a programme of audit and verification, to satisfy the Harbour Authority that it is fulfilling its Statutory Duties and remains compliant with the PMSC.

In addition, the Harbour Authority commissions a formal process of external audit of PMSC compliance. The external 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 external audit is conducted at different ports or regions each year on a three-yearly cyclical basis.

During December 2019, external audits were undertaken in our Humber region, covering the operations of Humber Estuary Services and in the port of Southampton. Full reports were produced for consideration by the Audit Committee.

The themes emerging from the 2019 regime of audits identified the following areas for improvement:

- ➢ Compliance with Marine Training Matrix
- ➢ Review of Navigational risk assessments, post incident occurring
- ➢ Review of Marine Safety Management System, particularly sections where group content has been amended
- ➢ Documented procedures and evidence of reporting ship related defects to MCA

The two external audits of HES and Southampton determined that they were seen to be compliant with the PMSC, however the Southampton report identified the following areas for improvement:

- ➢ Marine Safety Management System updates (local procedures aligned with Group policies)
- ➢ Management of navigational risk assessments
- ➢ Hosting of Marine SMS (not user friendly, document control issues)
- ➢ Marine Staff resourcing

The following four-point improvement plan has been drafted to address these areas:

1. Risk Assessment hazard ID workshop & Marnis Training workshop

2. Full review of Marine SMS

3. Migrate all Marine SMS content onto SharePoint site

4. Confirm Marine staffing structure provides appropriate resource address

The following ports were internally audited by the Technical Authority Marine during 2019:

Port	Date
Ayr and Troon	10th and 11th Sep
Plymouth / Teignmouth	30th April & 1st May
Southampton	3 rd Dec (external audit)
Ipswich	4th June
Humber Ports	12th & 13th Nov (Grimsby and Immingham) 13th & 14th Mar (Hull and Goole)
HES	2nd & 3rd April (11th Dec for external audit)
South Wales	26th – 28th June
Lowestoft	22nd May
Barrow	28th Feb and 15th April
Fleetwood	19th Nov
Silloth	27th & 28th Feb
King's Lynn	23rd May
Garston	20th Nov

The Harbour Authority hold their meetings 4 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 2019.

The Marine Advisor papers 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. 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 order to maintain continued focus on reports of Dangerously Weighted Heaving Lines and Defective Pilot Ladders, Marnis continues to capture these incidents in two distinct categories. These two categories have also been added to the list of KPI's that are provided in the above mentioned Harbour Authority board reports.

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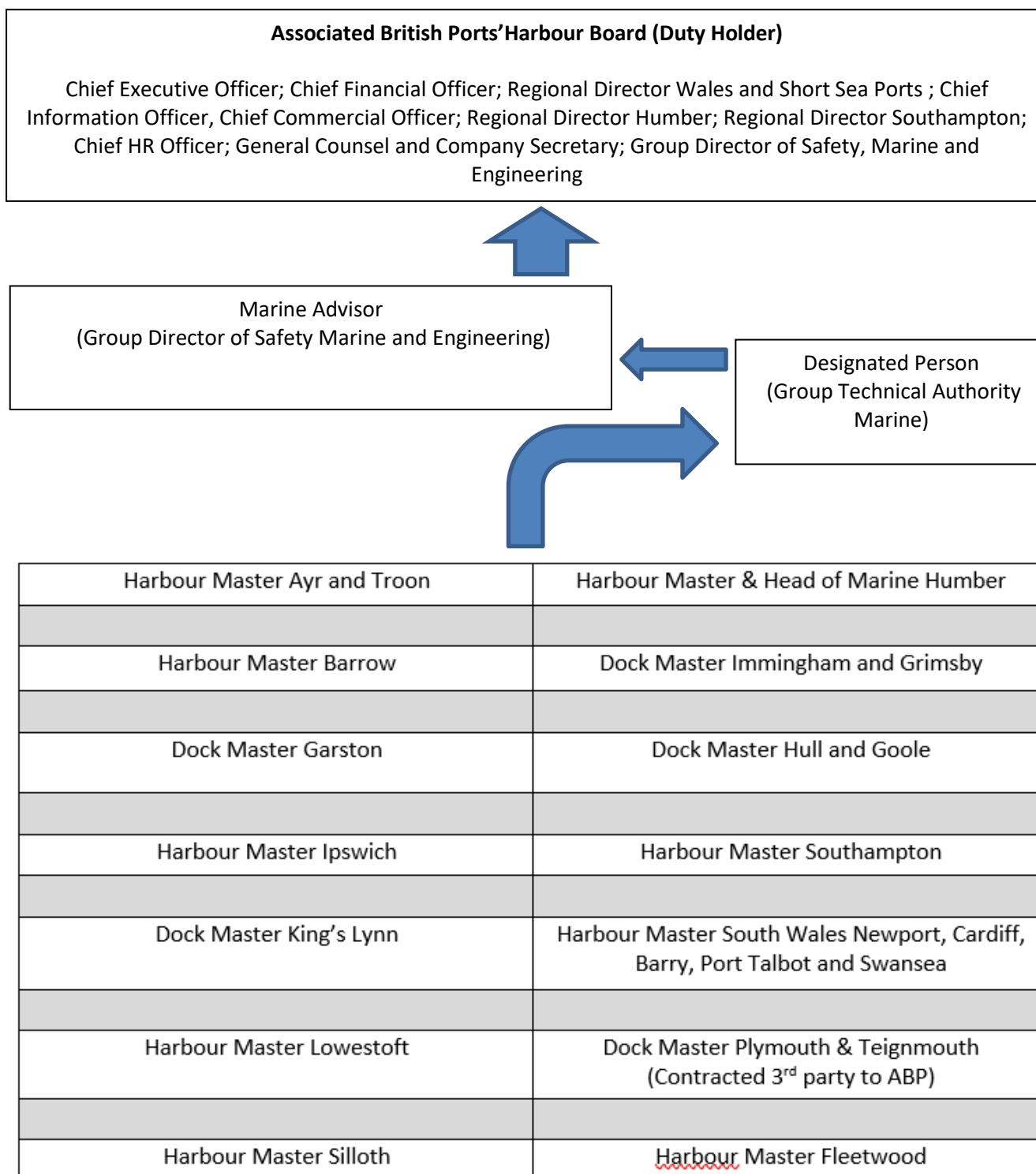
expected at the end of 2020, for reply by March 2021.

4   Key Personnel – ABP Harbour Authority

An organisation chart is shown in Figure 1.

The Chief Executive Officer and Chairman of the ABP Harbour Authority is Henrik Pederson.
The ABP Marine Advisor and Group Director of Safety Marine and Engineering is Mike McCartain.
The Group Technical Authority Marine and Designated Person is James Clark.

Figure 1: ABP Harbour Authority Organisation Chart

Associated British Ports'Harbour Board (Duty Holder)

Chief Executive Officer; Chief Financial Officer; Regional Director Wales and Short Sea Ports ; Chief Information Officer, Chief Commercial Officer; Regional Director Humber; Regional Director Southampton; Chief HR Officer; General Counsel and Company Secretary; Group Director of Safety, Marine and Engineering

Marine Advisor
(Group Director of Safety Marine and Engineering)

Designated Person
(Group Technical Authority Marine)

Harbour Master Ayr and Troon	Harbour Master & Head of Marine Humber
Harbour Master Barrow	Dock Master Immingham and Grimsby
Dock Master Garston	Dock Master Hull and Goole
Harbour Master Ipswich	Harbour Master Southampton
Dock Master King's Lynn	Harbour Master South Wales Newport, Cardiff, Barry, Port Talbot and Swansea
Harbour Master Lowestoft	Dock Master Plymouth & Teignmouth (Contracted 3rd party to ABP)
Harbour Master Silloth	Harbour Master Fleetwood

5   Vessel Movement Statistics

Figure 2: Shipping Movements 2012 to 2019

Annual Shipping Movements

Port	2012	2013	2014	2015	2016	2017	2018	2019
Goole	1,242	1,363	1,265	1,292	1,522	1,552	1,545	1,347
Grimsby	1,908	2,451	2,473	3,324	2,671	2,092	1,851	1,789
Hull	5,921	5,861	5,743	6,694	5,681	5,915	6,275	6,392
Humber Estuary Services	29,112	28,754	29,029	30,601	30,004	29,833	29,779	28,479
Immingham	10,862	10,519	10,881	10,570	11,312	11,531	10,997	10,431
Southampton	64,881	64,848	67,203	64,377	66,393	63,062	65,066	67,351
Ayr	255	353	298	276	336	203	259	285
Barrow	256	417	199	119	157	335	157	151
Fleetwood	0	0	0	0	0	0	0	0
Garston	399	462	332	325	415	518	381	401
Ipswich	1,792	1,259	1,455	1,622	1,720	1,444	1,296	1,399
Kings Lynn	548	488	464	516	485	369	360	376
Lowestoft	1,724	1,346	1,011	1,073	1,384	1,317	1,106	1,410
Plymouth	855	780	754	722	747	698	685	797
Silloth	172	179	136	92	106	93	118	125
Teignmouth	361	364	359	326	304	349	351	294
Troon	895	931	895	604	195	197	213	309
Barry	270	298	312	336	271	310	375	310
Cardiff	2,541	1,929	1,689	1,734	1,482	1,554	1,323	944
Newport	1,266	1,039	1,450	1,269	1,423	1,524	1,532	1,577
Port Talbot	409	457	573	353	337	334	328	362
Swansea	1,204	1,198	1,009	811	815	721	760	696
TOTAL	**126,873**	**125,296**	**127,530**	**127,036**	**127,760**	**123,951**	**124,757**	**125,225**

	2012	2013	2014	2015	2016	2017	2018	2019
Southampton	64,881	64,848	67,203	64,377	66,393	63,062	65,066	67,351
Humber	49,045	48,948	49,391	52,481	51,190	49,371	50,447	48,438
South Wales	5,690	4,921	5,033	4,503	4,328	4,443	4,318	3,889
Short Sea Ports	7,257	6,579	5,903	5,675	5,849	5,523	4,926	5,547
TOTAL	**126,873**	**125,296**	**127,530**	**127,036**	**127,760**	**123,951**	**124,757**	**125,225**

Figure 3: Annual Shipping Movements by Region 2014 to 2019

Annual Shipping Movements by Region

Legend: Southampton, Humber, South Wales, Short Sea Ports
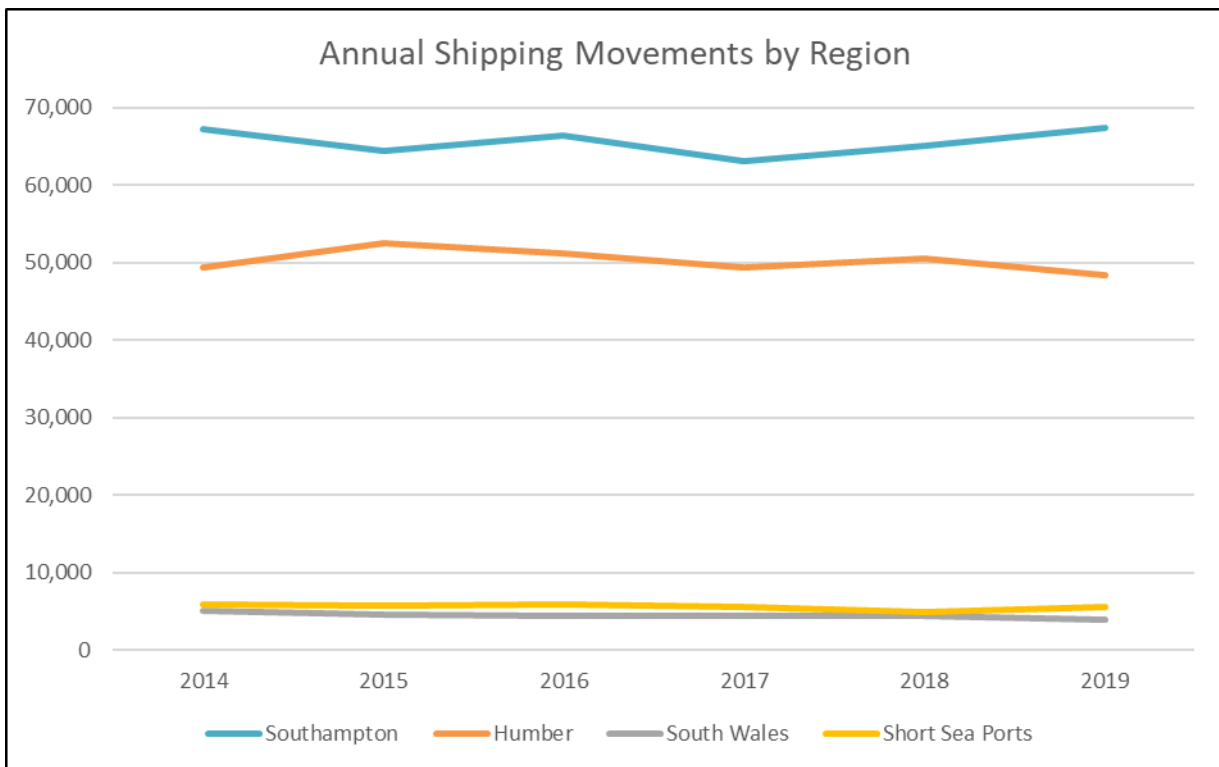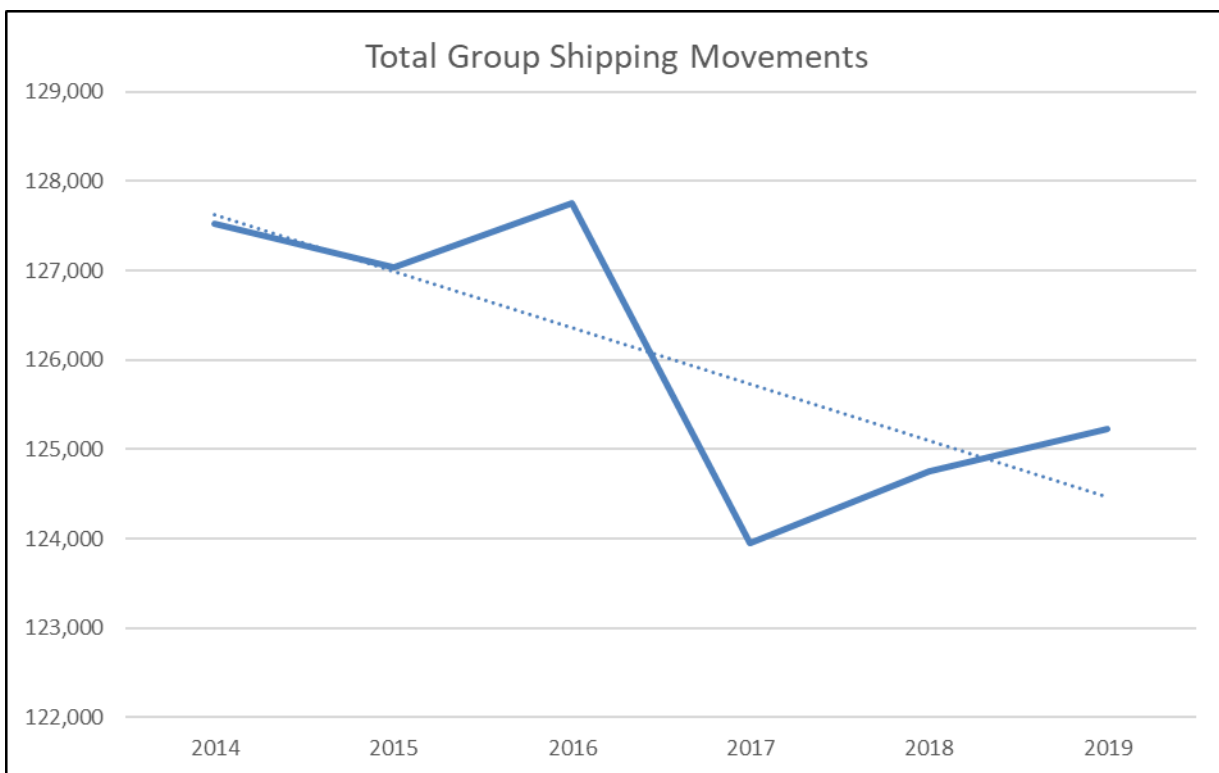
Figure 4: Shipping Movement Trend 2014 to 2019

Total Group Shipping Movements

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. Most 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 125,225 shipping movements during 2019, with a significant majority being in Southampton and the Humber Estuary. It should be noted that Southampton numbers include high frequency movements of Red funnel ferries to and from the Isle of Wight which account for approximately 23% of Southampton's vessel movements.
This represents an increase of 468 shipping movements when compared with 2018. Further details of shipping movements per port are illustrated above in Figure 2.

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.

Incidents which occur are recorded and reviewed. The more significant or serious incidents require in depth investigation and 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. Emphasis is placed on reporting and recording potential incidents, which are investigated in the same way as actual events. In addition, a standardised Marine Incident Investigation template document is used in order to standardise the way we investigate and report Marine investigations.

Incident numbers and trends are key indicators of 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 2019.

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 2018, as well as trends over the last 3 years.

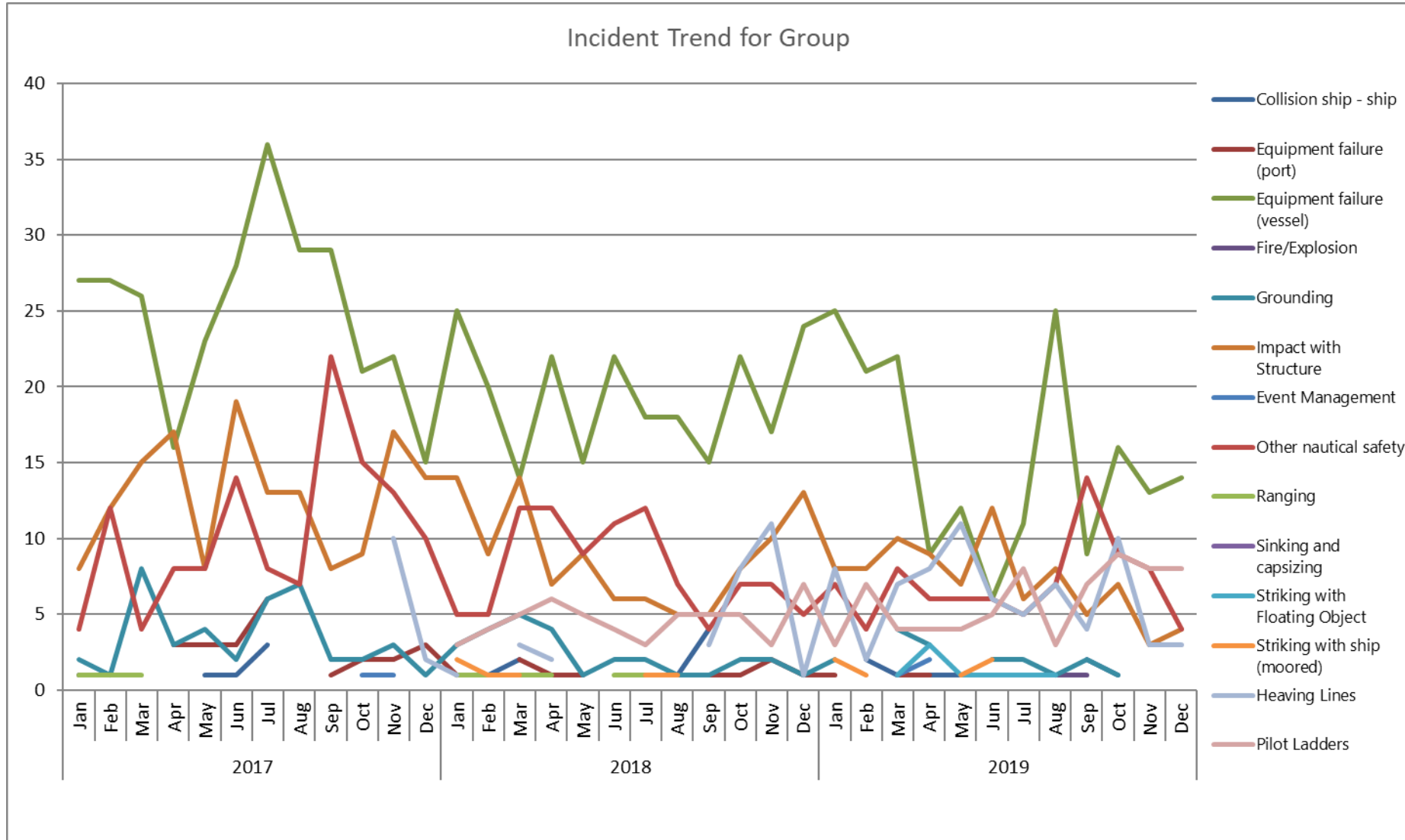**Figure 5: Nautical Safety Incident Trends (by incident type)**

Incident Trend for Group

Figure 6: Total Incidents and Potential Incidents Trend

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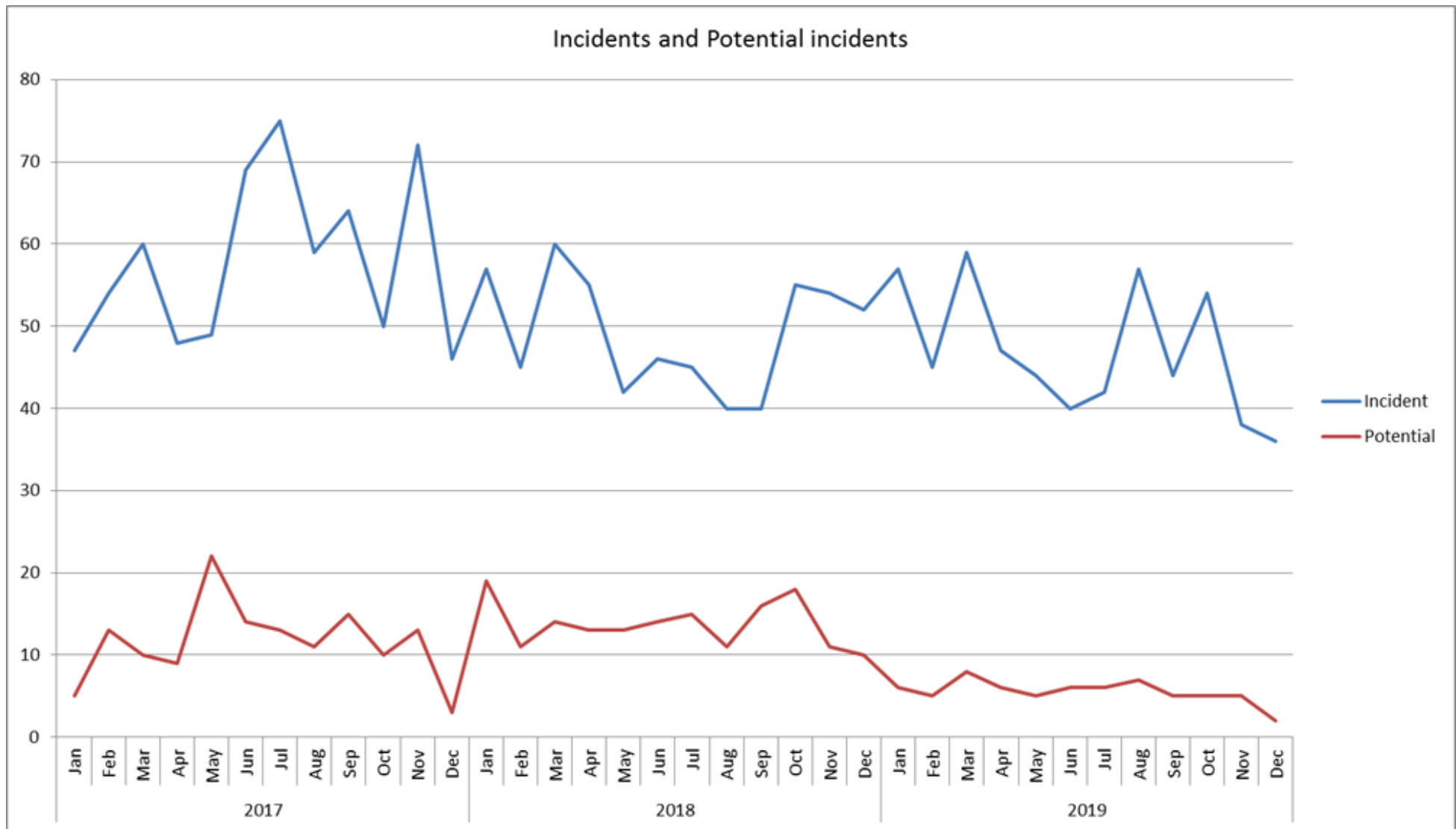
Figure 7: Incidents per 1000 Movements - Southampton and Group Trend

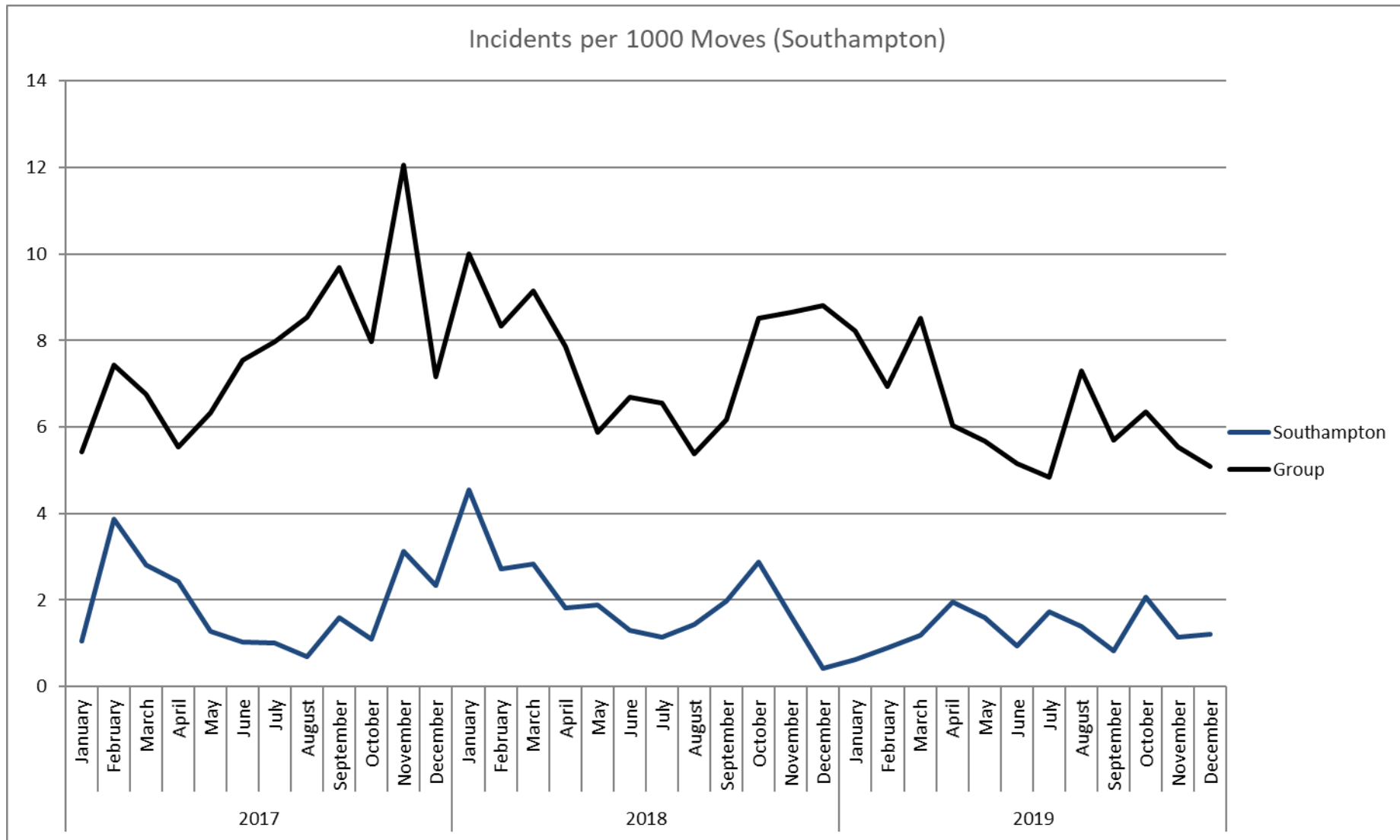Incidents per 1000 Moves (Southampton)

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

Incidents per 1000 Moves (Humber)

Legend: Goole, Grimsby, Hull, HES, Immingham, Group
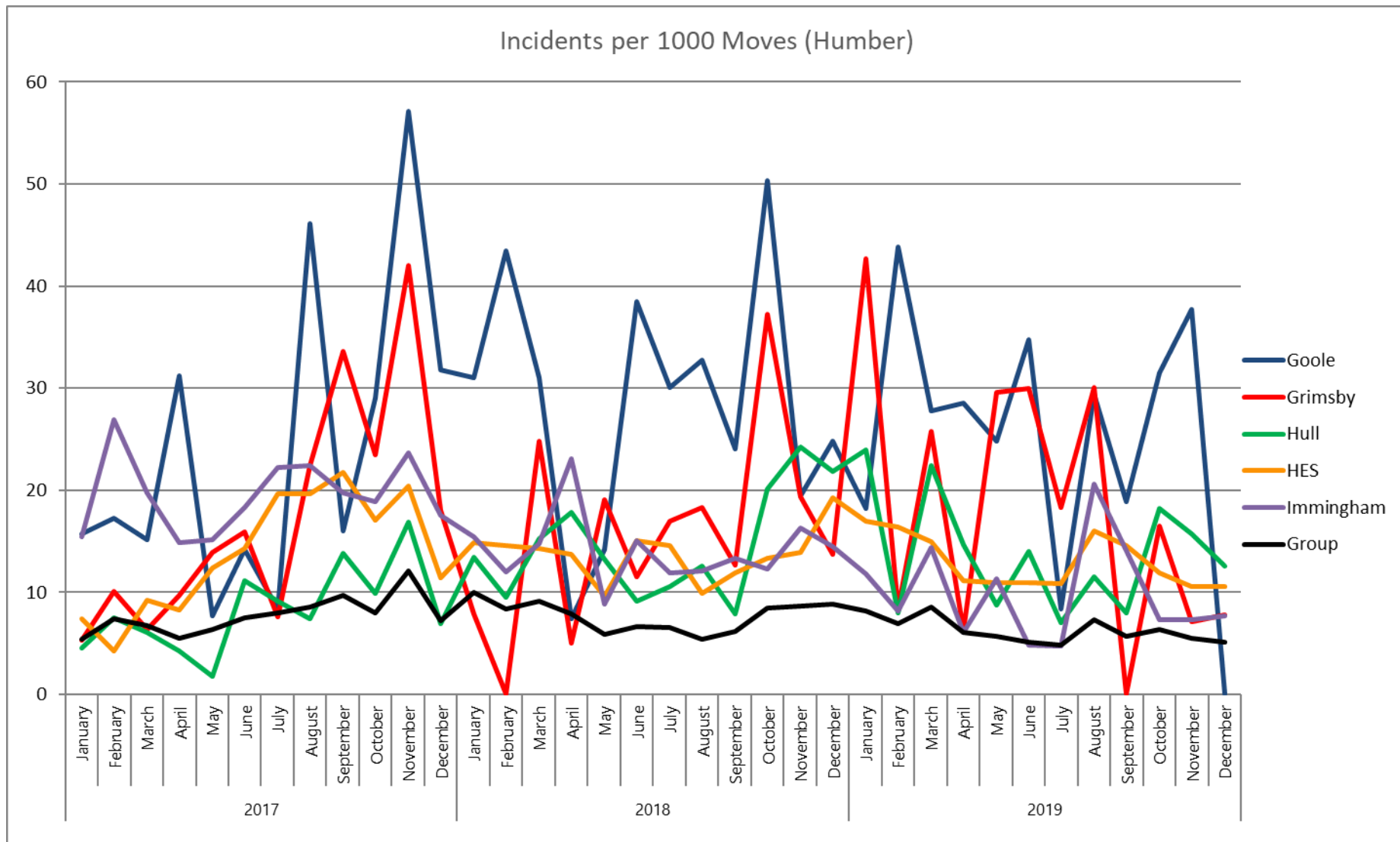
Figure 9: Incidents per 1000 Movements - South Wales and Group Trend

Incidents per 1000 Moves (S. Wales)

Legend: Barry, Cardiff, Newport, Port Talbot, Swansea, Group
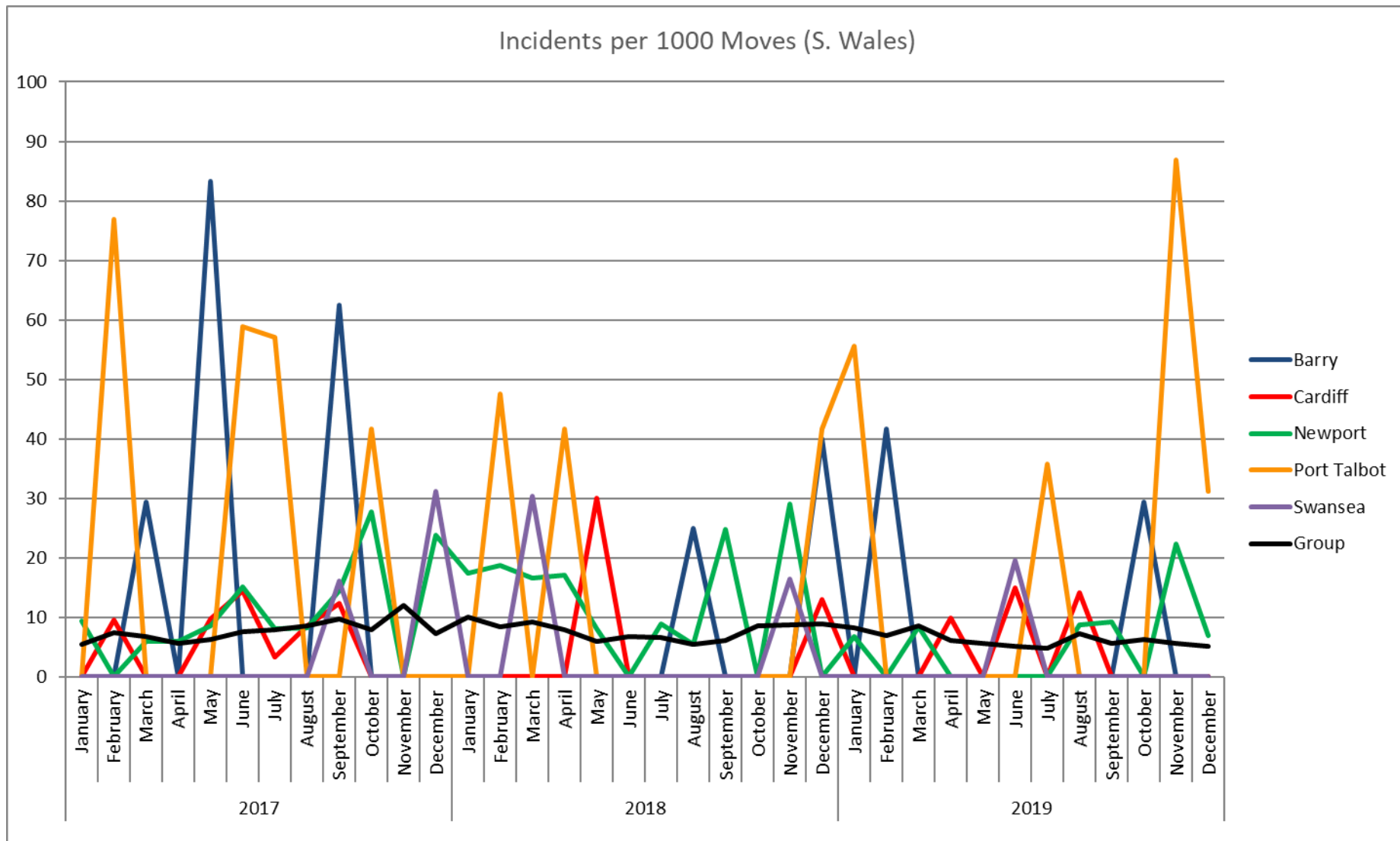
Figure 10: Incidents per 1000 Movements - Short Sea Ports and Group Trend
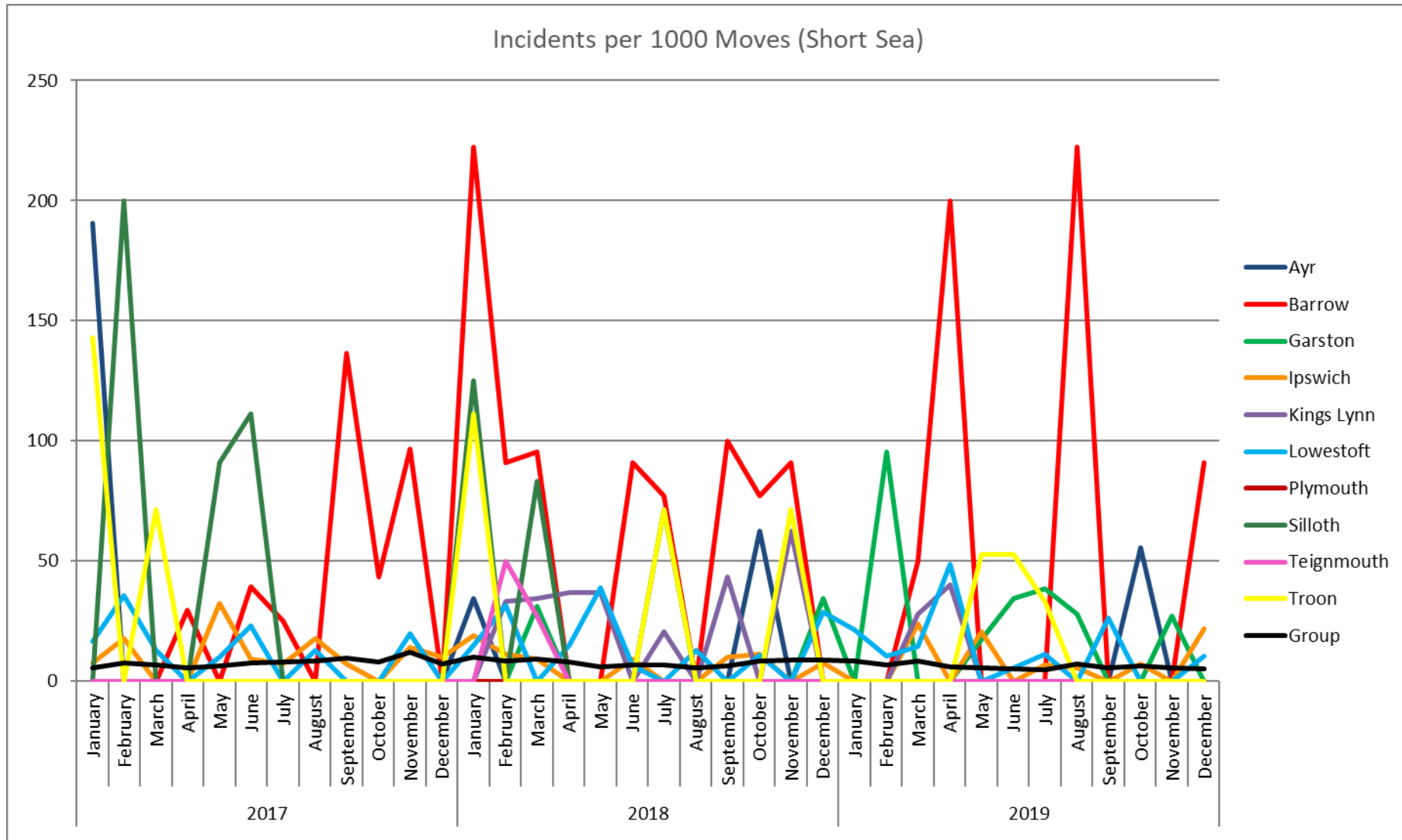
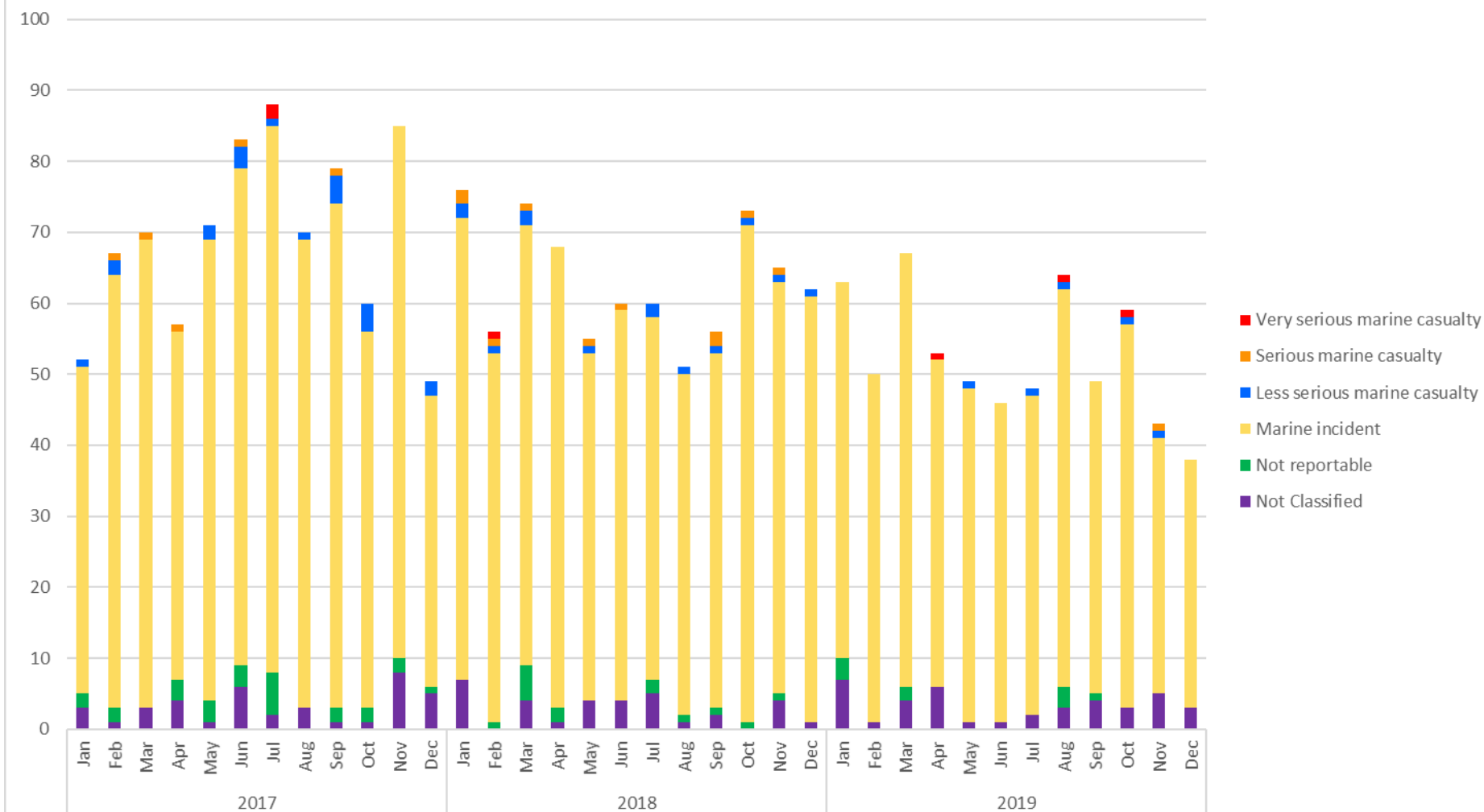Incidents per 1000 Moves (Short Sea)

Figure 11: MAIB Incident Classification Trends

Incidents Reported to the MAIB
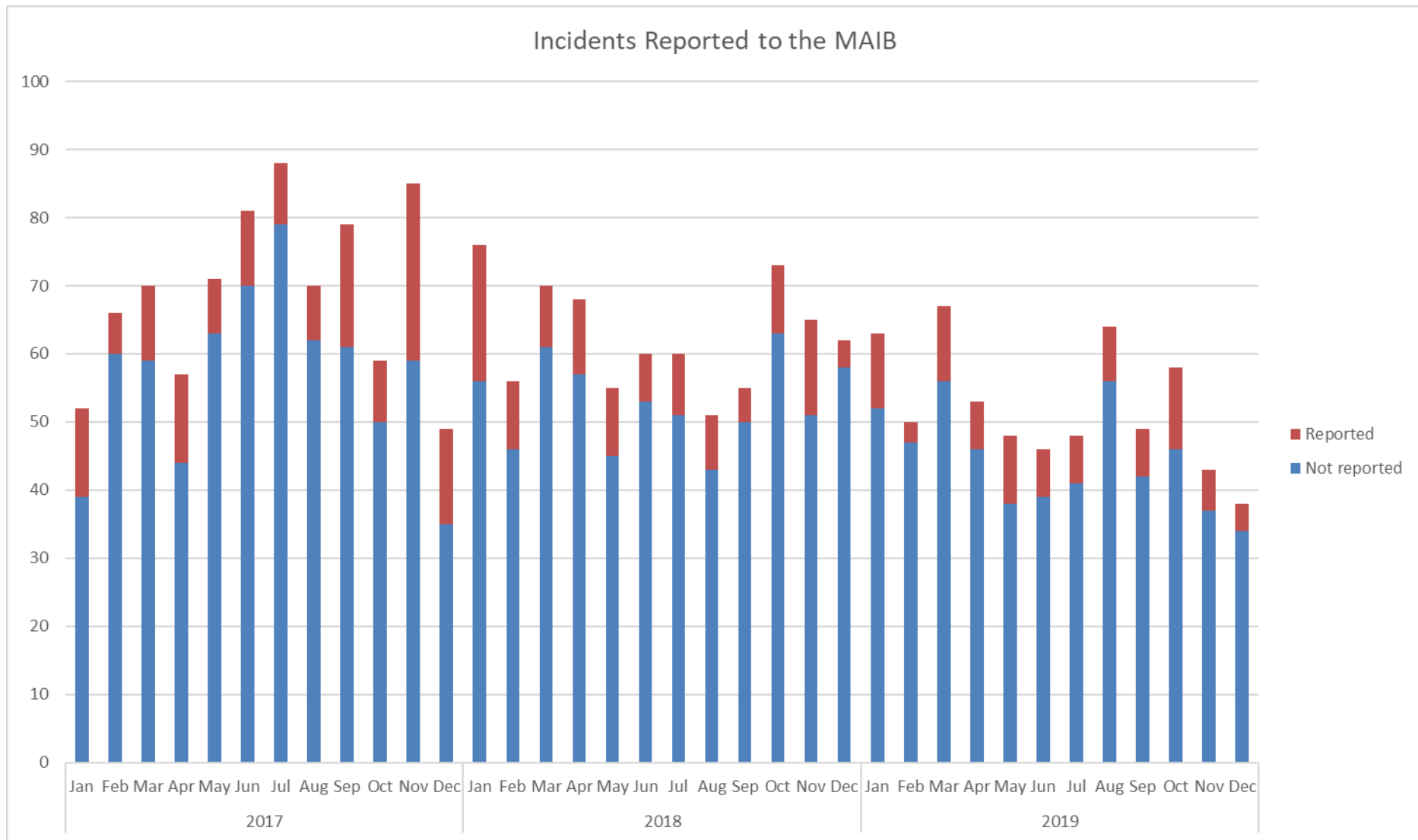
7 <u>Key Performance Indicators</u>

In addition to monitoring incidents as an indicator of historic safety performance, ABP have identified several 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 2019 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
    - Shipping movement numbers (Shipping Movements by Region)
- Incidents and unplanned events
    - 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 indictors shown below seek to give re-assurance that Risk Assessment and incident reporting / investigation is effective.

- 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 2019)
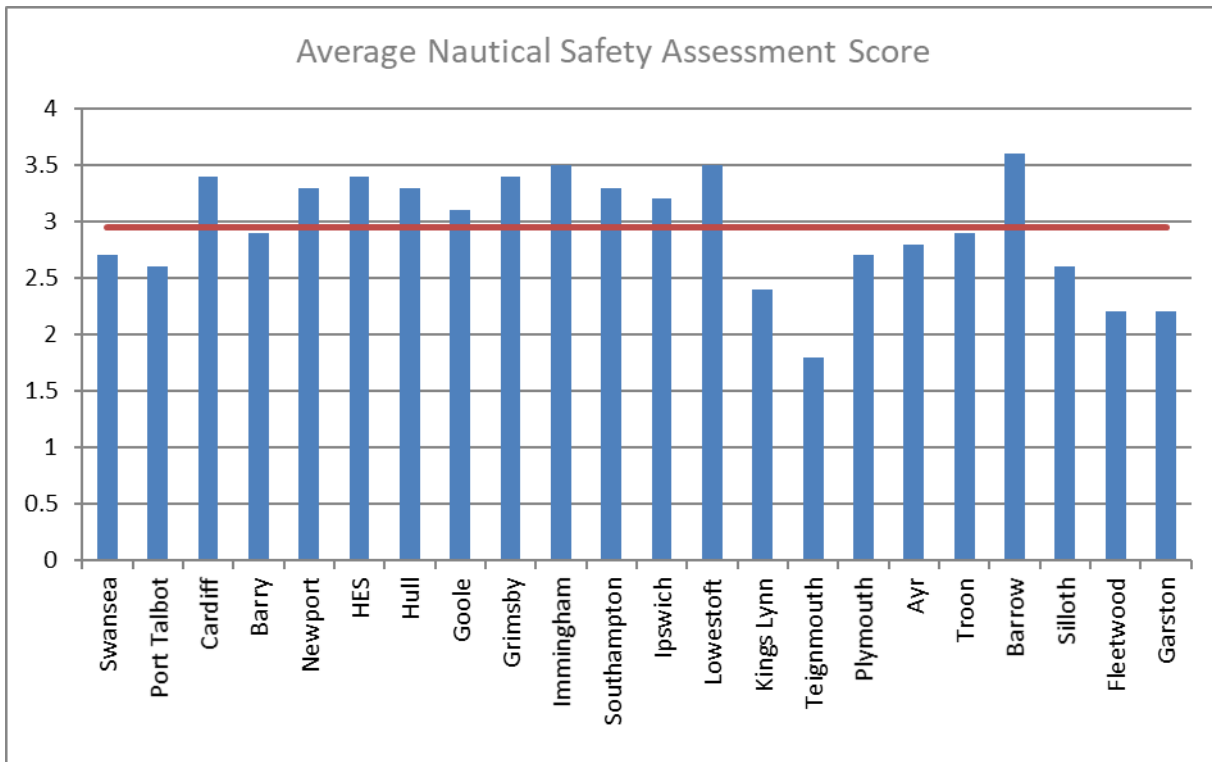

Average Nautical Safety Assessment Score

Figure 13: Incidents - Time to Resolve During 2019

Resolution Timescale for Nautical Safety Reports

Legend:
- >24 Weeks
- 13-24 Weeks
- 5-12 Weeks
- 2-4 Weeks
- 0-1 Week
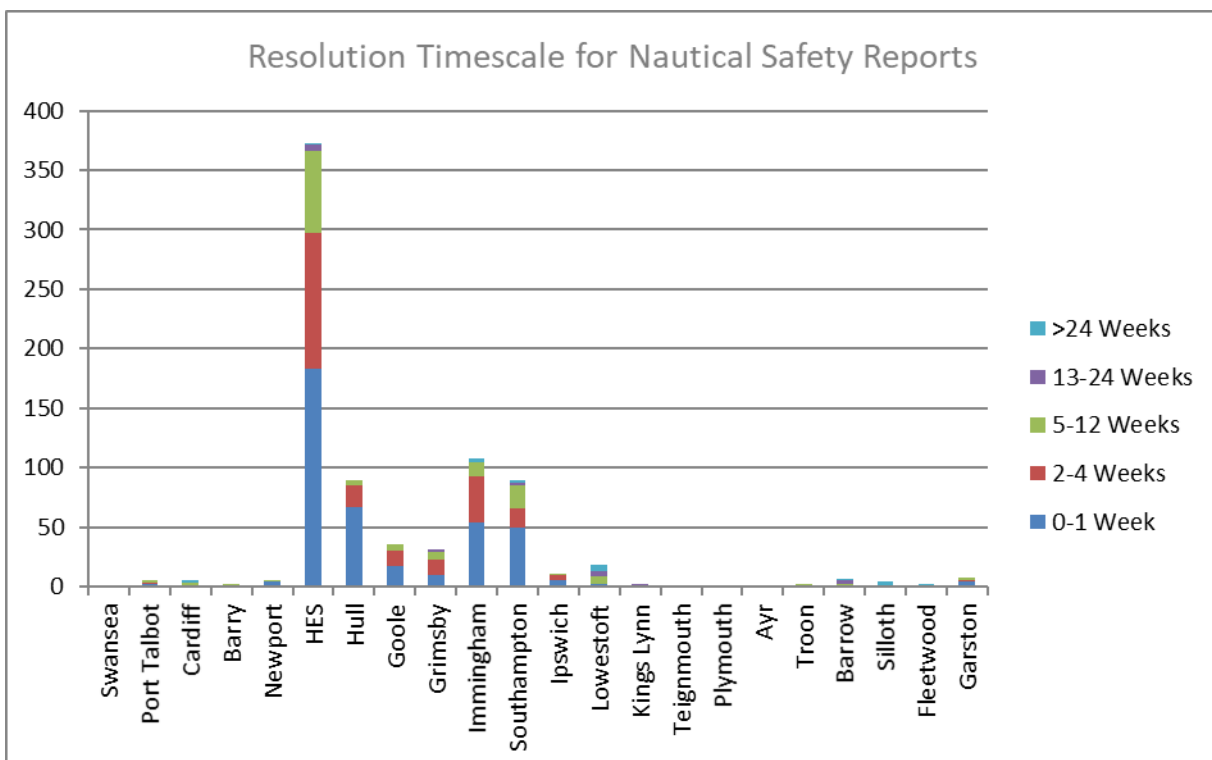
Figure 14: Mean Weeks to Close Incidents (2019)

Mean Weeks To Close Nautical Safety Reports
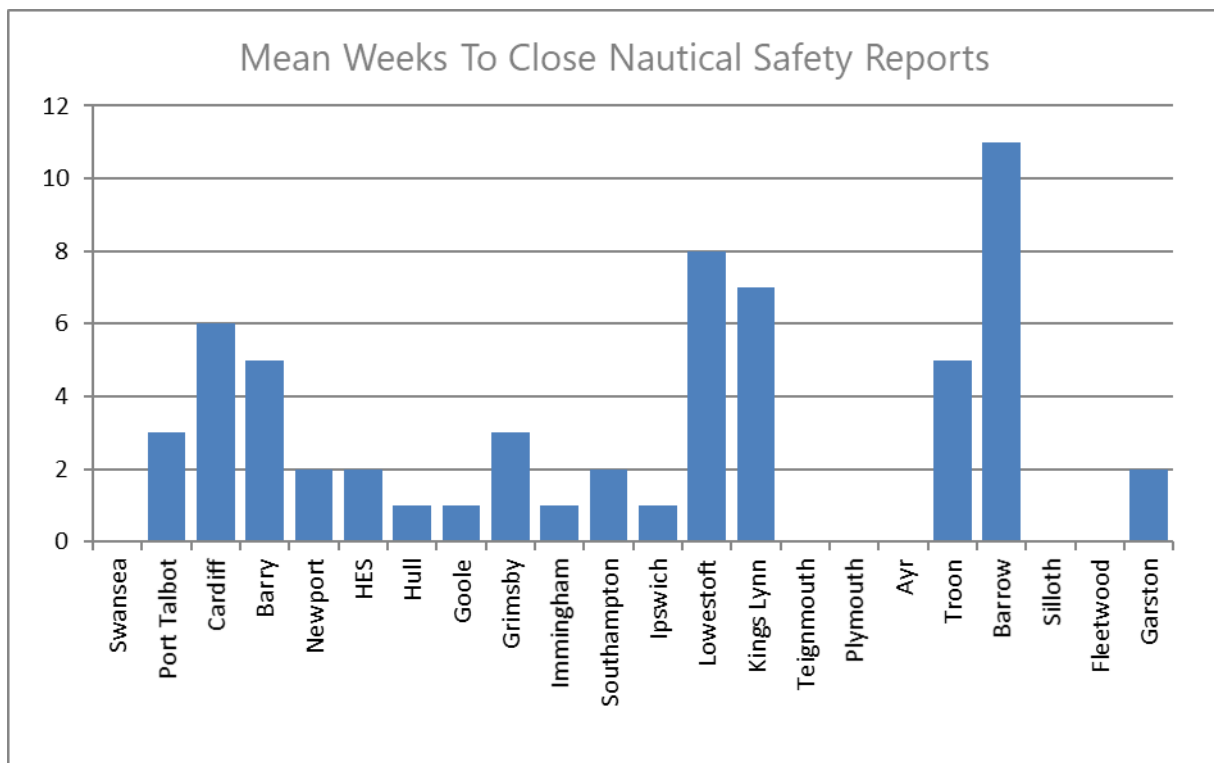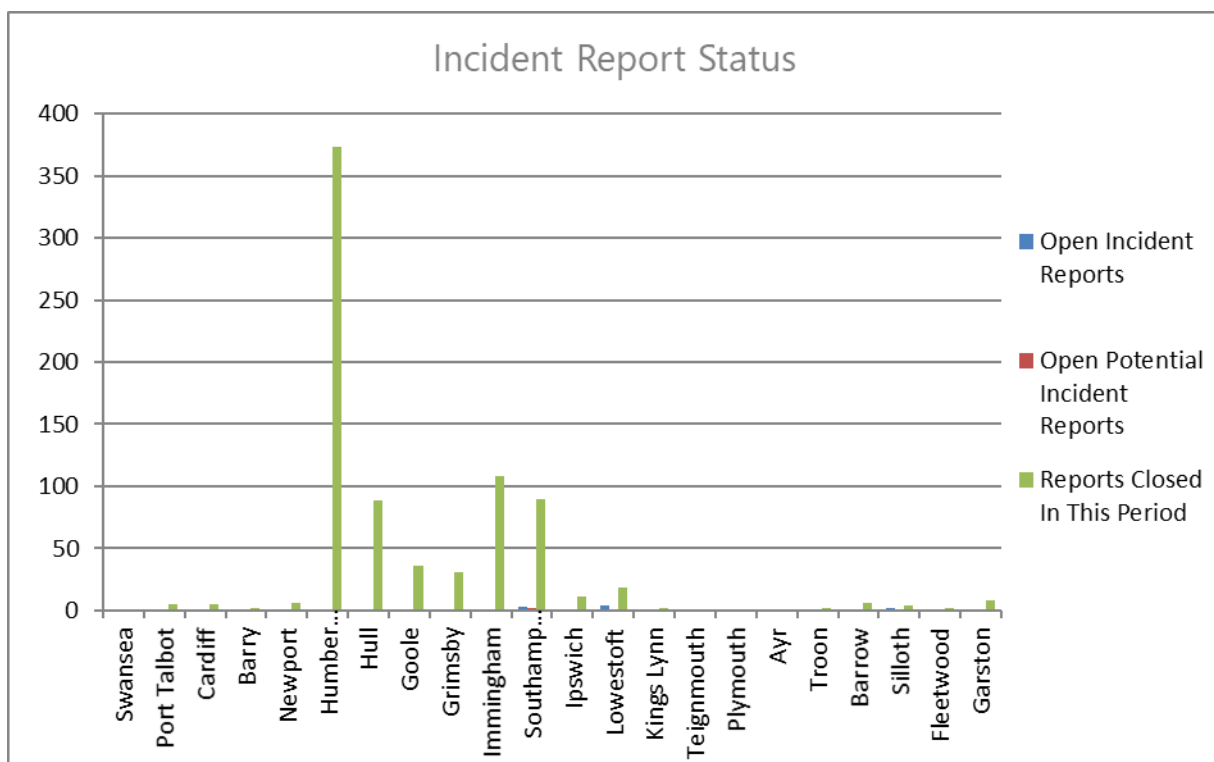
Figure 15: Incidents - Status at Year End (2019)

Incident Report Status

8   Commentary and Continuous Improvement

This report reviews the performance of the Associated British Ports Statutory Harbour Authority across 22 diverse Harbour authority functions. 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 systems.

In general, the trend in marine incident reports is downward when compared to 2017 and 2018. The highest frequency of reported marine incidents is the category of Equipment Failure (vessel), which covers a wide range of ship related defects which are managed as they present themselves, usually with towage and also support from port state control via the Maritime and Coastguard agency.

2019 saw a specific study into this group of Equipment failure (vessel) reports and determined that general cargo vessels of **50 – 100 metres** in length attract the largest proportion of equipment failure (vessel) reports and that the largest majority of these reports stem from **engine or steering gear failures**. This analysis will be particularly noteworthy in our smaller ports or terminals where most of the trade to these locations are on small 50 – 100 metre general cargo vessels.

This analysis has helped us to better understand the risk profile of specific ship types and sizes and will assist with Navigational risk assessment reviews. The below graphs help to visualize the output of the study:
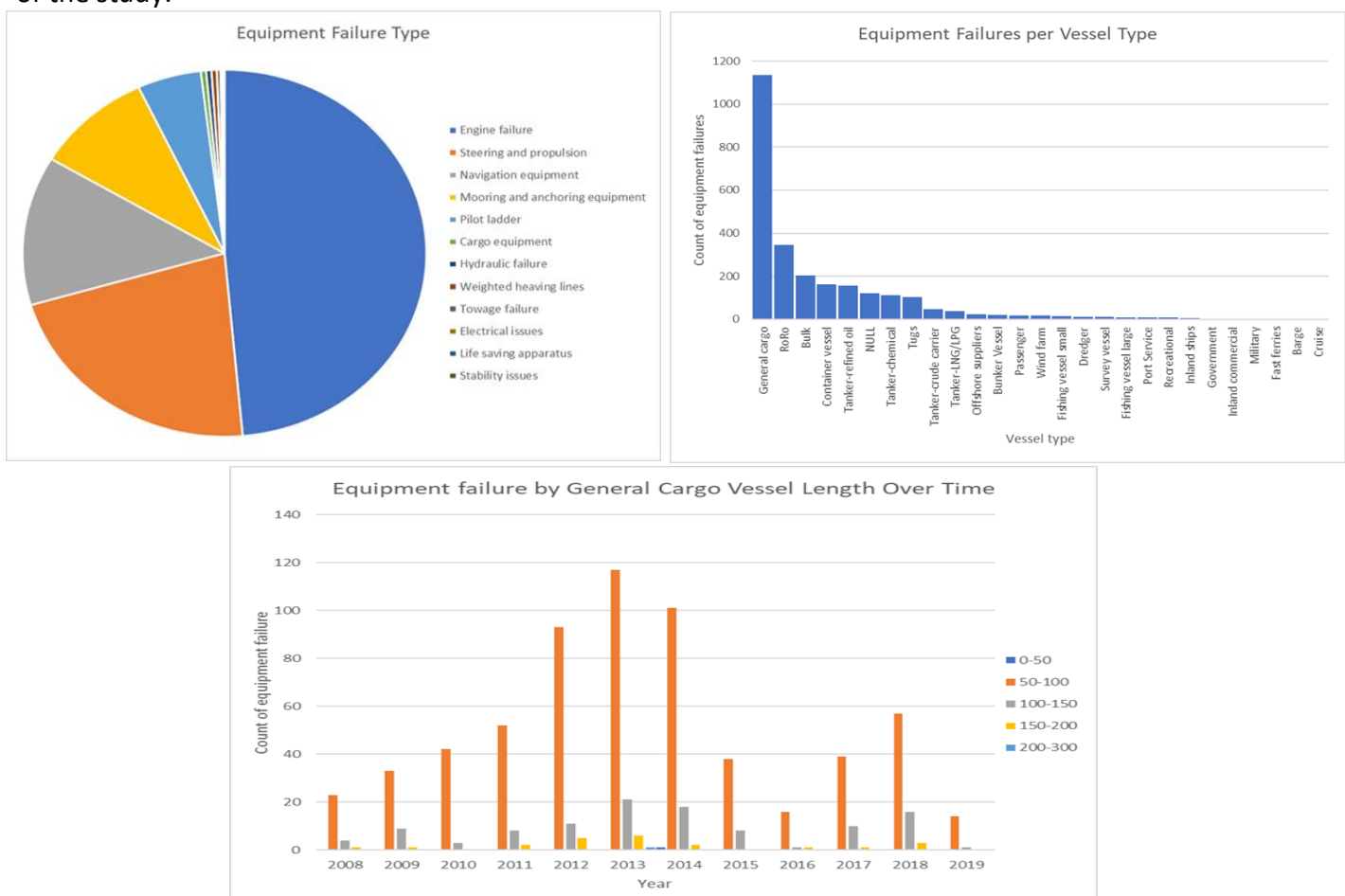
8.1 KPIs

Most 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 and effectiveness of port marine operations and the Marine SMS.

With respect to traffic volumes, it will be noted that the slight downward trend witnessed over the last 5 years continues, 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.

Many of the smaller ports saw a levelling or increase in vessel numbers during 2019 compared to 2018, with some, notably Lowestoft, seeing a marked increase in vessel movements due to new contracts.

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, accept in Southampton, by the end of 2019 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 considered at two-monthly intervals 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. ABP has also adopted an investigation matrix which helps to identify incidents which require a thorough and detailed investigation, a separate Marine Investigation template is used in these cases.

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 to MAIB (151 in 2019). However, Figure 11: MAIB Incident Classification Trends clearly illustrates that the vast majority of these reports are not MAIB reportable. 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. 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 vessels 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.

9   Progress against Objectives Set in Previous Report

During 2019, 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 2019. The current Marine Safety Plan covers 2017 – 2019 and is under review to draft a 2020 – 2022 version.

Target #	Description	Target	Time Scale	Progress at 31/12/2019
1	Keep KPIs under review and introduce new / relevant KPIs as appropriate	Monitor KPIs and review as required	Annually	Last reviewed in Sep 2019, no new KPI's added
2	To ensure consistent application / implementation of the MSMS across all ports	Successful annual internal audit at each location	Annually	2019 plan Completed
3	Review Marine Policy	Annual or as required by external factors	Annually	Policy reviewed September 2019
4	Review Group Marine SMS	Annual or as required by external factors	Annually	Completed in Nov 2019 with eleven amendments / updates
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	Ongoing	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 a Harbour Revision Order (HRO) to achieve better regulation of users.	July 2018	Template completed and National consultation underway. HRO for Southampton drafted
7	Consolidated Port Operational Procedures Manuals	All ports to have their manuals in new format	End 2017	Complete
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 <u>Public Compliance Statement</u>

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 September 2018 also describes how this compliance is achieved. ABP will be carrying out a further compliance exercise towards the end of 2020 prior to writing to the MCA in early 2021.

On behalf of ABP Harbour Board

Mike McCartain OBE Group Director Safety, Engineering and Marine (Marine Advisor)
Date 14th April 2020