



# Marine Safety Plan

2024–2026

| Date     | Reviewed by                                     | Notes                                      | Version |
|----------|---|--|---------|
| Oct 2023 | David McHardie<br>Edward Dowds<br>Monty Smedley | Draft                                      | 0.1     |
| Nov 2023 | Ross MacDonald<br>Scott Goodwill                | Draft                                      | 0.2     |
| Nov 2023 | Duty Holder                                     | Approved by Duty Holder                    | 1.0     |
| Dec 2023 | David McHardie                                  | Final Published                            | 1.0     |
| Dec 2024 | David McHardie                                  | Achieved objectives updated                | 1.1     |
| Jul 2025 | David McHardie                                  | Updated with references to new PMSC        | 1.2     |
| Dec 2025 | David McHardie                                  | Achieved objectives updated                | 1.3     |
| Mar 2026 | David McHardie                                  | Minor update of Commitment section wording | 1.4     |
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# Marine Safety Plan

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## Introduction

As a Statutory Harbour Authority and marine facilities owner, Caledonian Maritime Assets Ltd (CMAL) has responsibility to ensure a safe environment for the general public and users of the 26 ports, harbours, slipways jetties and other facilities under their jurisdiction at which ships can obtain shelter or ship and unship goods or passengers, collectively herein referred to as harbours. This is achieved through the implementation of the requirements laid down in the CMAL Marine Safety Management System (MSMS), supporting documents and management processes, supported as required by the SMS, risk assessments, procedures and processes of its contracted Harbour Operator, CalMac Ferries Ltd (CFL).

CMAL are committed to complying with the Ports and Marine Facilities Safety Code (the Code), which lays down minimum standards of safety applicable to all harbours and similar establishments.

The Operational and Safety Management System Policy is the principal document in the safety management system for all statutory and non-statutory CMAL harbours. It includes the safety management arrangements for maritime and shore-based operations that are the responsibility of CMAL and identifies and describes the areas of harbour operations that are within the remit of the contracted Harbour Operator.

While CMAL retains accountability, with few exceptions it is the responsibility of the Harbour Operator to undertake and manage the everyday business of the harbours under the authority of CMAL. The Harbour Operator must, as a minimum standard, meet the requirements of the [Department of Transport Ports and Marine Facilities Safety Code](#).

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## Commitment

This Marine Safety Plan have been published to demonstrate the CMAL Board, as Duty Holders under the Code are committing CMAL and their harbour operator to undertake the management and regulation of marine operations and in particular the safety of navigation, within the scope of its powers and authorities and in a way that safeguards employees, users of the port including members of the public, the port infrastructure and the marine environment while managing commercial pressure without undermining safe provision of services.

The safety plan is one component of the MSMS and serves to support the continuing improvement of all aspects of marine safety performance.

Specifically, CMAL recognises that as Harbour Authority, it has:

- Statutory and non-statutory duties as conferred by local Acts, Empowerment Orders and general legislation;

- Duties and obligations to conserve and facilitate the safe use of their harbours, and a duty of care against loss caused by negligence by the authority or its harbour operator; and
- Duties to ensure the safety of marine operations are matched with general and specific powers to enable the authority to discharge these duties.

The requirements of the MSMS fully comply with those detailed in the Code and the Department of Transport '[A Guide to Good Practice on Port and Marine Facilities](#)' and other pertinent legislation.

CFL's Safety Management System is integrated within its overall business, with specific aspects relating to the safe operation of Harbours, and is utilised in conjunction with CMAL's own MSMS, collectively assuring joint compliance with the PMSC.

Acting on behalf of the CFL Board, the Group Risk and Audit Committee is required to ensure the adequacy and effectiveness of harbour policies and procedures adopted, in compliance with all legislation and other requirements. The committee advises the CFL Board on the planned activity and results of both internal and external audits.

CFL's entire Management System is reviewed annually with a management review report submitted to their Executive Board prepared by the Director of Health, Safety, Quality and Environment (HSQE) for approval. In addition, CFL undertake ad hoc reviews, as required, when a major change occurs such as the redesign of a port, alteration to a port layout or changes in legislation.

This Marine Safety Plan is intended to cover a rolling three-year period but is refreshed and checked for continuing relevance on an annual basis.

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## Marine Policy

CMAL has published a Port Marine Safety Policy, confirming the Duty Holder's commitment to compliance with the PMSC.

CMAL has also published a number of other marine policies and plans in support of the MSMS:—

- Harbours Enforcement and Prosecution Policy
- Navigational Safety Pilotage and Towage Policy
- Marine Conservancy Policy

In addition, CFL (as part of the David MacBrayne Group Ltd) has published:—

- Environmental Policy
- Health & Safety Policy

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## Marine Procedures

Operational procedures within CMAL harbours marine function are described within the CFL Harbour Operations Manual and work instructions. These are supported at each port/marine location by local risk assessments detailing hazards specific to each site. All such publications are reviewed on a regular basis by the respective CFL managers.

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## Established Marine Activities

Due to CMAL and CFL's structure with a single Duty Holder covering multiple port locations, marine safety activities are divided between those undertaken at organisational level and those undertaken on an operational level at each location.

The following activities are the responsibility of CMAL's independent Designated Person to undertake at all locations on behalf of the Duty Holder:—

- Production and review of strategic level MSMS related policies.
- Through regular internal and external audit, provide an oversight of PMSC compliance and identify improvement opportunities through sharing of best practice.

The following activities are the responsibility of CMAL's Port Infrastructure and Planning department to undertake at all locations on behalf of the Duty Holder:

- Conservancy, i.e. provision and maintenance of aids to navigation, bathymetric surveys, dredging;
- Issue and management of notice to mariners;
- Maintaining, repairing, improving and enhancing harbour assets.

The following activities are the responsibility of the Harbour Operator to undertake at all locations on behalf of the Duty Holder:—

- Formal quarterly meetings with CMAL and regular liaison with the Harbour Master;
- Proactive and reactive review of all existing and any new identified hazards to navigation associated risk control measures that mitigate these risks to an acceptable level (ALARP);
- The maintenance, exercising and regular review of Emergency Plans and Procedures including Oil Spill Contingency Plans and Business continuity plans;
- Provision of training, advice, guidance and equipment to harbour operations staff to ensure all locations consistently, proactively and reactively review risk assessments for all identified marine hazards and identify control measures to mitigate those risks to an acceptable level (as low as reasonably practicable—ALARP);
- The investigation of all reported navigational incidents including near misses and the maintenance of a comprehensive incident management system;

The following activities will normally be ongoing at each port location and is the responsibility of the local port manager (with appropriate support from regional harbour managers):—

- Regular harbour operations team meetings;
- Compiling and review of marine risk assessments, reporting of defects, and incidents and assisting with incident investigations;
- Regular consultation with harbour users (stakeholders) by means of formal meetings of harbour user group forums or other forms of engagement;
- Training of harbour operations staff to CFL standards;
- Production and exercising of emergency plans;
- Internal audits.

Such activities may be divided into those that are established and ongoing / routine in support of PMSC compliance, and those which are additional or temporary management targets seeking to ensure continuous improvement in port marine safety.

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## Performance Objectives

As statutory harbour authority, CMAL seeks to continuously improve the Duty Holder's compliance with the requirements of the PMSC, and reduce all foreseeable risks associated with harbour operations to the lowest practical level (ALARP).

The detailed plans for PMSC compliance are contained within the respective CMAL and CFL's Safety Management System documents.

The performance indicators listed hereafter outline the process used to monitor ongoing compliance and prompt continuous improvement towards best practice in marine operations across all CMAL ports, harbours and facilities. The improvement plan will be cyclical in nature and follow the sequence below.

| #  | Task   | Objective   | By 01 October | How Measured   | Date Achieved |
|----|--|---|---------------|--|---------------|
| 1. | <b>Marine Safety Plan—</b><br>Publish a safety plan showing how the standards in the PMSC will be met and a report assessing their performance against that plan at least every 3 years      | Publish a 3-yearly Marine Safety Plan (this plan) and make it available publicly on CMAL website and to the Duty Holder   | 2024          | Published and in-date                                | 18/09/24      |
|    |  |   | 2025          | Published and in-date                                | 10/10/25      |
|    |  |   | 2026          | Published and in-date                                |               |
| 2. | <b>Designated Person—</b><br>Appoint a 'Designated Person' with direct access to the duty holder to provide independent assurance about the operation of the marine safety management system | Appoint and at all times maintain a Designated Person to provide independent assurance directly to the 'duty holder' that the safety management system is working effectively.                | 2024          | Maintain an appointed person                         | 18/09/24      |
|    |  |   | 2025          | Maintain an appointed person                         | 07/10/25      |
|    |  |   | 2026          | Maintain an appointed person                         |               |
|    |  | Designated Person will provide a report to the Duty Holder for every Board Meeting, and once per year will appear in person at a Board meeting to provide a PMSC audit annual summary report. | 2024          | 100% reports submitted and attends one Board meeting | 06/08/24      |
|    |  |   | 2025          | 100% reports submitted and attends one Board meeting | 05/08/25      |
|    |  |   | 2026          | 100% reports submitted and attends one Board meeting |               |

|    |  |  |   |  |                        |          |
|----|--|--|---|--|------------------------|----------|
| 3. | <b>PMSC Audits—</b><br>Regular independent PMSC compliance audits are conducted of a CMAL ports                      | The Independent Designated Person will conduct scheduled PMSC compliance audits of not less than five CMAL ports per annum   | 2024  | Scheduled audits conducted                     | 13/09/24               |          |
|    |  |  | 2025  | Scheduled audits conducted                     | 09/07/25               |          |
|    |  |  | 2026  | Scheduled audits conducted                     |                        |          |
|    |  |  | The Independent Designated Person will report audit findings to the Duty Holder within a reasonable time and clearly summarise any recommendations to be taken at the port, harbour or facility to ensure improvement and compliance with the PMSC. | 2024   | Reports to Duty Holder | 23/01/25 |
|    |  |  |   | 2025   | Reports to Duty Holder | 24/09/25 |
|    |  |  |   | 2026   | Reports to Duty Holder |          |
| 4. | <b>Formal Risk Assessment Review—</b><br>Review and audit all port formal risk assessments of port marine activities | The Harbour Operator will complete a review of their formal risk assessment of the port marine activities for all CMAL ports | 2024  | Risk Assessments received and reviewed by CMAL | Review ongoing         |          |
|    |  |  | 2025  | Risk Assessments received and reviewed by CMAL | 17/12/25               |          |
|    |  |  | 2026  | Risk Assessments received and reviewed by CMAL |                        |          |

| #  | Task  | Objective   | By 01 October | How Measured  | Date Achieved |
|----|---|---|---------------|---|---------------|
| 5. | <b>Regulating Harbour Works—</b><br>All marine risks associated with any harbour works within SHA areas that are liable to influence safety of navigation, are formally risk assessed                               | Through a Harbour Works Consent process, CMAL will ensure all qualifying works are risk assessed to establish the impact they may have on safety of navigation, identify and implement any control measures to eliminate the associated risks or reduce to as low as reasonably practicable | 2024          | Evidence of works licence/ consent process being followed | 31/12/24      |
|    |   |   | 2025          | Evidence of works licence/ consent process being followed | 12/12/25      |
|    |   |   | 2026          | Evidence of works licence/ consent process being followed |               |
| 6. | <b>Competence—</b><br>Appoint, develop and retain sufficient competent people, who are appropriately trained, qualified and experienced, in positions of responsibility for managing marine and navigational safety | Ensure that all Harbour Operator staff, with marine safety responsibilities are appropriately trained and qualified to undertake their duties   | 2024          | Training analysis received from Harbour Operator          | Ongoing       |
|    |   |   | 2025          | Training analysis received from Harbour Operator          | 18/12/25      |
|    |   |   | 2026          | Training analysis received from Harbour Operator          |               |
| 7. | <b>Contingency &amp; Emergency Planning—</b><br>Prepare and maintain plans that ensure effective response, management, and co-ordination in respect of emergency incidents  | For all CMAL SHAs, the Harbour Operator will: <ul style="list-style-type: none"> <li>• Provide and maintain Port Emergency Plans</li> <li>• Provide and maintain MCA approved OPRC Plan</li> <li>• Regularly test emergency plans as required.</li> </ul>                                   | 2024          | Internal / external audit                                 | 13/09/24      |
|    |   |   | 2025          | Internal / external audit                                 | 24/09/25      |
|    |   |   | 2026          | Internal / external audit                                 |               |

|    |  |   |      |                          |          |
|----|--|---|------|--------------------------|----------|
| 8. | <b>Consultation—</b><br>Liaise and consult with all port users at all statutory harbours | The Harbour Operator will organise and chair regular meetings, not less than annually, of harbour user consultative forums for the purpose of facilitating users' contributions to risk assessment and of informing and updating users on the day-to-day management of marine operations in the port or facility. | 2024 | Meeting minutes received | 19/12/24 |
|    |  |   | 2025 | Meeting minutes received | 18/12/25 |
|    |  |   | 2026 | Meeting minutes received |          |

| #  | Task   | Objective  | By 01 October | How Measured             | Date Achieved |
|----|--|--|---------------|--------------------------|---------------|
| 9. | <b>Accident Reporting &amp; Investigation—</b><br>Robustly, rigorously and promptly investigate all marine accidents or incidents, reporting as required | The Harbour Operator will report any marine casualty or marine incident that occurs within the jurisdiction of CMAL to the MAIB in accordance with the latest reporting MGN and forward copy reports to CMAL | 2024          | Reports received by CMAL | 14/11/24      |
|    |  |  | 2025          | Reports received by CMAL | 01/10/25      |
|    |  |  | 2026          | Reports received by CMAL |               |
|    |  | Following any marine incident, accident or near miss, the Harbour Operator will review any/all relevant formal risk assessments and report the outcome to CMAL   | 2024          | Reports received by CMAL | 31/10/24      |
|    |  |  | 2025          | Reports received by CMAL | 06/03/25      |
|    |  |  | 2026          | Reports received by CMAL |               |
|    |  | The Harbour Operator will investigate all reported marine incidents and complete investigations within one month, reporting the outcome to CMAL within 30 days of completion                                 | 2024          | Reports received by CMAL | 24/11/24      |
|    |  |  | 2025          | Reports received by CMAL | 13/08/25      |
|    |  |  | 2026          | Reports received by CMAL |               |

| #   | Task  | Action  | Year | How Measured                                    | Date Achieved |
|-----|---|---|------|---|---------------|
| 10. | <b>Conservancy—</b><br><br>Conserve the<br><br>harbour and its approaches | <b>Hydrographic Surveys—</b> Ensure all statutory ports and approaches have an adequate schedule of hydrographic surveys and that these are undertaken in line with the defined schedule.   | 2024 | Scheduled annual hydrographic surveys completed | 17/07/24      |
|     |   |   | 2025 | Scheduled annual hydrographic surveys completed | 15/12/25      |
|     |   |   | 2026 | Scheduled annual hydrographic surveys completed |               |
|     |   | <b>Aids to Navigation—</b> as a Local Lighthouse Authority provide and maintain adequate navigational aids that achieve the required availability standards, are consistent with port user requirements to facilitate safe navigation within the ports and in approaches and comply with the directions from Northern Lighthouse Board, supplying them with information and annual availability returns | 2024 | Annual report submitted to NLB by due date      | 08/04/24      |
|     |   |   | 2025 | Annual report submitted to NLB by due date      | 07/04/25      |
|     |   |   | 2026 | Annual report submitted to NLB by due date      |               |
|     |   | <b>Wrecks and Obstructions—</b> Conduct a risk assessment of all reported wrecks and obstructions in, or in or near the approaches to, a harbour to assess the danger to navigation, with the aim of reducing the risk to as low as reasonably practicable  | 2024 | Evidence of Risk Assessments conducted          | 20/09/24      |
|     |   |   | 2025 | Evidence of Risk Assessments conducted          | 10/12/25      |
|     |   |   | 2026 | Evidence of Risk Assessments conducted          |               |

| #   | Task  | Action   | Year | How Measured                 | Date Achieved |
|-----|---|--|------|------------------------------|---------------|
|     |   | <b>Observed weather and tidal information—</b><br>Monitor environmental and tide level data for all CMAL major ports and make live data available to vessels using those ports on a 24/7 basis, achieving an annual availability not less than 95% | 2024 | Confirmed via internal audit | 31/12/24      |
|     |   |  | 2025 | Confirmed via internal audit | 31/12/25      |
|     |   |  | 2026 | Confirmed via internal audit |               |
| 11. | <b>Performance of harbour operations—</b><br><br>Monitor the Harbour Operator's performance | Review contract KPIs as necessary and introduce new / relevant KPIs as appropriate.<br><br>CFL to submit KPIs to CMAL on a quarterly basis   | 2024 | Reports received by CMAL     | 13/07/24      |
|     |   |  | 2025 | Reports received by CMAL     | 01/10/25      |
|     |   |  | 2026 | Reports received by CMAL     |               |