



Navigational Safety, Pilotage and Towage Policy

Date	Reviewed by	Notes	Version
Jan 2018	Kevin Hobbs	—	1.0
Apr 2019	David McHardie	—	1.1
Apr 2020	David McHardie	—	1.1
Jun 2021	David McHardie	—	1.1
Sep 2022	David McHardie	—	1.2
Oct 2023	David McHardie	—	1.3
Jun 2025	David McHardie	—	1.3
Feb 2026	David McHardie	Section 3 bulleted list updated. Reference to CMAL Head of Harbour Operations appointed as Harbour Master added	1.4

1. Introduction

Caledonian Maritime Assets Ltd (CMAL) is the Statutory Harbour Authority (SHA) for 16 ports, harbours¹ and slipways across the West of Scotland and the Clyde Estuary and own the associated port infrastructure and properties at each of these locations. CMAL also owns and leases several other marine facilities at various locations primarily associated with the delivery of Clyde and Hebrides Ferry Services.

CMAL makes these assets available under contract to CalMac Ferries Limited (CFL) to manage as the Harbour Operator. CFL have day-to-day responsibility for managing navigation and other marine activities within the statutory harbours and non-statutory facilities.

CMAL's Board are the Duty Holders under the Port Marine Safety Code.

2. Navigational Safety

Under the Ports and Marine Facilities Safety Code (the Code), CMAL is responsible for the effective enforcement of regulations made and directions given to assist in managing marine operations and ensuring safety of navigation within their harbours.

The Head of Harbour Operations is appointed in writing by the Duty Holder as Harbour Master. They are the principal person who is responsible for the safety of navigation and other related activities in the harbours, approaches and other areas within the limits of the CMAL jurisdiction.

The Head of Harbour Operations:

- Maintains strategic and operational oversight of the activities of the Harbour Operator to ensure the delegated harbour operational and management responsibilities of CMAL as statutory harbour authority or non-statutory asset owner are discharged;
- Liaises with, guides and supports the Harbour Operator as required to ensure safe and efficient operation of CMAL harbours and facilities.

3. Marine Safety Management System

CMAL and the Harbour Operator have jointly developed and maintain an effective Marine Safety Management System (MSMS) based on continuing assessment and mitigation of risk that includes the following functional requirements.

- Marine safety, environmental and enforcement policies;
- Navigational and safe working risk assessments;
- Marine Safety Plan;
- Responsibilities of the Duty Holder, Harbour Master and the Harbour Operator;

¹ For a list of locations see <http://www.cmassets.co.uk/harbours/locations/>

- Training matrix and records for Port operatives;
- Procedures to ensure safe navigation of vessels;
- Emergency plans and procedures;
- Occurrence reporting and investigation of accidents procedure;
- Maintenance plans and equipment and structures inspection records;
- Management reviews and audit regime;
- Forms and checklists.

4. Navigational Risk Assessment

All harbours within CMAL's area of responsibility are operated as 'open ports', this means that the public have a general right of navigation.

It is the responsibility of the Harbour Operator to assess, compile and maintain navigational risk assessments for the harbours for which they have contractual responsibility.

Areas that are to be considered when undertaking a navigational risk assessment are:

- Whether the harbour has direct and easy access to the open sea or whether it has a long approach channel;
- Whether the harbour has dense traffic requiring a high degree of management and regulation, or has little traffic in which the risk of collision is minimal;
- Whether the vessels using the harbour are of widely differing characteristics, which as a result could have consequences for other navigation and require the assignment of specified channels, e.g. deep draught vessels;
- Whether cargo is handled by ships at anchor, moored to buoys, or berthed alongside;
- Types of cargo handled e.g. dangerous and pollutant goods, and their effect on other navigation;
- Numbers and types of recreational craft;
- Presence of high-speed craft, passenger ferries and local ferries;
- Availability and monitoring harbour VHF frequencies;
- Under-keel clearances, and/or draught restrictions;
- Harbour regimes, depth of water, sand banks, bars, shoaling patterns; meteorological conditions, tides and currents;
- Berth locations;
- Proximity of the navigation channel to shore structures (particularly hazardous ones);
- Berthing arrangements;
- Berth fitness and suitability (berthing forces).

The Harbour Operator's risk assessment process will identify any requirements for Vessel Traffic Services (VTS) and specifically Pilotage.

5. Marine Traffic Management

A harbour authority's primary duty is to ensure the safe and efficient use of the harbour by those who have a right to use it and navigate in its waters. This includes a duty to regulate navigation using available powers and other means.

Exercise of this function depends upon communication with mariners and other harbour users.

As a minimum, the means of achieving this will be by the Harbour Operator providing a local port service at every staffed CMAL harbour location.

6. Promulgation of Information

The Harbour Master will ensure navigational information including (but not limited to) water depth, navigational hazards, harbour works, navigational lights and marks are published in a range of publications including Admiralty charts, relevant sailing information and in Notices to Mariners.

The UK Hydrographic Office is notified of any permanent or temporary change in navigational marks and hazards for appropriate publication.

If the Harbour Master or Harbour Operator become aware of any navigational hazard that is not presented on marine charts or other published navigational information, they will, having verified any reports received, publish a suitable warning. The Harbour Master may issue a warning by means of a Notice to Mariners and the Harbour Operator may issue a verbal warning via VHF traffic information broadcasts. Such navigational warnings may include (but not be limited to):—

- Adverse weather conditions;
- Shipping movements including STS Operations;
- Changes in charted water depths;
- Damaged or malfunctioning Aids to Navigation;
- New or amended Aids to Navigation;
- Wrecks or abandoned vessels;
- New or temporary exclusion areas;
- Works in harbour areas; and
- Miscellaneous safety warnings.

If the navigational hazard is not of a temporary nature, the Harbour Master is responsible for communicating with the UK Hydrographic if considered necessary to instigate changes to nautical charts and published information.

7. Vessel Traffic Services (VTS)

VTS is designed to improve the safety and efficiency of navigation, safety of life at sea and protection of the marine environment and/or adjacent shore areas, worksites and offshore installations from possible adverse effects of maritime traffic.

Currently CMAL do not utilise VTS at any of the harbours under their control. The future requirements for VTS and the extent of the services provided will be based on the risk assessment process driven by changes to harbour utilisation and requirements and in accordance with the guidance in the Code and IMO Resolution A.857 (20).

8. Passage Planning

Every vessel's navigational passage should be planned in adequate detail to/from the berth and with contingency plans such as abort positions and anchorages where appropriate when navigating in the areas of CMAL jurisdiction. Any mariners operating a Vessel which proceeds to sea should ensure it is operated in accordance with SOLAS Chapter V Regulation 34.

Masters and Officers of the watch will use the above guidelines for voyage planning, implementing the following measures to ensure that they understand the risks to which they are exposed and take effective measures to reduce such risks including ensuring that there is a systematic organisation on board that provides for:

- Comprehensive briefing of all concerned with the navigation of the vessel;
- Regular monitoring of the vessel's position with the use of different methods to check against error in any one system;
- Using the information available from plots of other traffic to ensure against overconfidence, bearing in mind that with the number of vessels in this area other vessels may alter course and/or speed;
- Ensuring that the optimum and systematic use is made of all appropriate information that becomes available to the navigational staff;
- Pre-arrival/departure checks should be completed in good time prior to arrival within CMAL areas of jurisdiction or departure from their berth.

CMAL reserve the right to require passage plans to be submitted by any vessel using or passing through their harbour areas on a case-by-case basis whether vessels are piloted or not. CMAL reserve the right to commission independent passage plan checks on vessels not subject to compulsory pilotage and on every occasion following an incident. Harbour passage plans can be required using the powers of direction.

The future requirements for passage plans will also be based on the risk assessment process driven by changes to harbour utilisation and requirements. Any future requirements for the provision of passage plans will be implemented in accordance with the guidance in the Code.

9. Subsea Pipeline/Cables

The Harbour Operator will ensure that any CMAL harbour areas with interfaces with sub-sea cables and pipelines are specifically identified and addressed within the risk assessment process.

10. Pilotage

Currently there is no requirement for pilotage to be provided within the jurisdiction of any harbours for which CMAL is the Harbour Authority. If subsequently required, the process will be risk assessed and introduced in accordance with the guidance outlined in the Code.

However, the approaches to several CMAL harbours are situated within the jurisdiction of Peel Ports (Clydeport), a Competent Harbour Authority for the purposes of the Pilotage Act 1987. In pursuance of its powers under Section 7 of the said Act, Peel Ports (Clydeport) issues Pilotage Directions to ships navigating within the limits of its jurisdiction.

In doing so it specifies what criteria which will apply to vessels, Masters and Mates in determination of the requirement for pilotage within its waters.

Under the Pilotage Act 1987, Exemptions from Pilotage are available to bona fide Masters and Mates of regular traders, i.e. only the person in charge or the second in command of a vessel.

Candidates wishing to present themselves for a Pilotage Exemption Certificate within Clydeport's area of jurisdiction must comply with their published requirements contained within their Pilotage Directions.

11. Ship Towage

Currently there is no provision of towage services at any of the harbours for which CMAL are the Harbour Authority. If subsequently required, the process will be risk assessed and introduced in accordance with the guidance to the Code.

Any vessels undertaking planned towage within CMAL's statutory harbours are required to apply to the Harbour Master for a tug licence for those harbours where the harbour legislation requires, and in all other statutory harbours, towage consent.

Kevin Hobbs

Chief Executive Officer