

Port Marine Safety Code Marine Safety Plan

2024 – 2027



Reviewed April 2024

Introduction

ABP has committed to comply with the requirements of the Port Marine Safety Code (PMSC), which includes the publication of a Marine Safety Plan.

This safety plan is one component of a comprehensive (strategic level) Marine Safety Management System (MSMS) and serves to support the continuing improvement of all aspects of ABP's marine safety performance, and ongoing compliance with the PMSC.

The plan is intended to cover a rolling three-year period but will be refreshed and checked for continuing relevance on an annual basis.

1 Marine Policy

ABP has published a Marine Policy, confirming the Duty Holder's commitment to compliance with the PMSC. The latest version of the policy can be downloaded from the corporate marine web site (www.abpmarine.co.uk). This policy is supported by additional marine policies covering training and VTS provision, as well as other corporate policies, particularly health and safety.

2 Continuous Improvement Plan

ABP has also published a continuous improvement plan, which outlines the *process* adopted to ensure that the Group continues to improve compliance with all aspects of the Port Marine Safety Code. The Continuous Improvement Plan supports this Marine Safety Plan (See Appendix)

3 Marine Procedures

Operational procedures within the ABP Marine function are described in the ABP Group Port Marine Operational Procedures Manual and supported at each port / marine location by local manuals detailing procedures which are specific to each site. All such manuals are reviewed on a regular basis by the respective marine managers.

Together, the policy and procedures outline those activities which have been identified as necessary to ensure the safe and efficient management of marine activities in all our ports and making best use of ABP's statutory powers and responsibilities.

Such activities may be divided into those that are established and ongoing (or routine) in their support of PMSC compliance, and those which are additional (or temporary) management targets seeking to ensure continuous improvement in Port Marine Safety.

4 Established Marine Activities

Marine safety activities are divided between those undertaken at group level, and those undertaken at the ports:

The following activities are the responsibility of the Marine Advisor, and are undertaken on behalf of the Duty Holder to cover all ports:

- Production and review of top level MSMS documentation. (Policy and manuals).
- Ownership and maintenance of the system (MarNIS) used for identifying hazards and assessing marine risks and recording and analysing marine incidents.
- Providing training (via ABPmer), advice and guidance to ensure that all locations consistently proactively review risk assessments for all identified marine hazards and when required, identify control measures to mitigate those risks to an acceptable level of ALARP (As Low As Reasonably Practicable).
- Provision of guidance on consistent incident investigation.
- Sourcing supplies and services (such as safety equipment, oil spill response contractors, and training) which will contribute to consistent compliance with the PMSC, as well as deliver value for money.
- Providing, through regular internal and external audit, oversight of PMSC compliance on behalf of the Duty Holder, and identify improvement opportunities for all ABP locations through sharing of best practice.

Furthermore, the following activities will normally be ongoing at each port location and will be the responsibility of the local Marine Management Team (with appropriate support from the Marine Advisor):

- Regular marine management team meetings.
- Creation and review of marine risk assessments using MarNIS and reporting of incidents / carrying out investigations.
- Regular consultation with harbour users (“Stakeholders”) by means of Port User Group Forum meetings or similar.
- Training of marine staff in line with the Marine Training Matrix group standards.
- Production and exercising of emergency plans.

5 Management Targets for Continued Improvement (“Marine Safety Plan”)

The targets on the following page support the ongoing improvement plan for the ABP Group of ports. This plan is owned by the Marine Advisor on behalf of the Duty Holder.

Ports may have additional improvement plans covering local issues, but this plan aims to address high level improvement targets which will benefit all locations and fulfils the requirement of the PMSC for the Duty Holder to maintain a “Marine Safety Plan”.

Target #	Description	Target	Time Scale
1	Keep KPIs under review and introduce new / relevant KPIs as appropriate	Monitor KPIs and review as required.	Annually
2	To ensure consistent application / implementation of the MSMS across all ports	Successful annual internal audit at each location	Annually
3	Review Marine Policy	Annual or as required by external factors	Annually
4	Review Marine Operations Manuals	Annual or as required by external factors	Ongoing throughout year (Verified by audit)
5	Improve level of Potential Incident (Near Miss) Reporting	To achieve a group wide ratio of two potential (Near Miss) reports for every actual incident report made via MarNIS. Still not being achieved despite being a target in the last	End 2024
6	Harbour Directions and Harbour Revision Order	<ul style="list-style-type: none"> Harbour Directions for Lowestoft to be issued in line with opening of new bridge. Draft pro-forma set of Harbour Directions to apply to designated ports prepared. Promotion of group wide HRO granting ABP power to issue landside General Directions (instead of amending antiquated byelaws) currently being considered. 	May 2024 (tbc) Dependent on HRO timings. Ongoing

7	Consolidated Port Operational Procedures Manuals	All ports to evidence a working synergy between Group updates being received and local interpretation being documented in the Marine SMS	Ongoing throughout year (Verified by audit)
8	To volunteer for at least one MCA Health check per year	Formally contact MCA Ports Liaison Lead annually	Annually
9	Continue to maintain a focus on mitigations around 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, and where possible support enforcement / penalty actions	Ongoing (to be reported to Harbour Board meetings four times a year)
10	Implementation of Port Owned Small Craft SMS	Promote a harmonised management system that reflects best practice across the group whilst meeting the requirements of each port.	Ongoing throughout year (Verified by audit)

Appendix – Continuous Improvement Plan

ABP as Harbour Authority for 21 separate Statutory Harbour Areas seeks to continuously improve the Authority’s compliance with the requirements of the Port Marine Safety Code, and reduce all foreseeable risks associated with ABP’s marine operations to the lowest practical level (ALARP).

This 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:

#	Task	Detail
1	Plan Audit Schedule	Draft and issue in early January (via a Marine Advisors Notice) the audit schedule / plan for the year, including any specific themes that will be a focus during the year
2	Undertake Audits	Conduct audits at ports according to the above plan. Follow up previous action points, themes identified at other ports, or by external bodies (MCA / MAIB). Provide support and guidance as required.
3	Establish action points	As a result of the audit, establish action points and areas for improvement. Also identify areas of best practice for sharing with all other ABP Ports
4	Report	Produce a written report containing 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	