



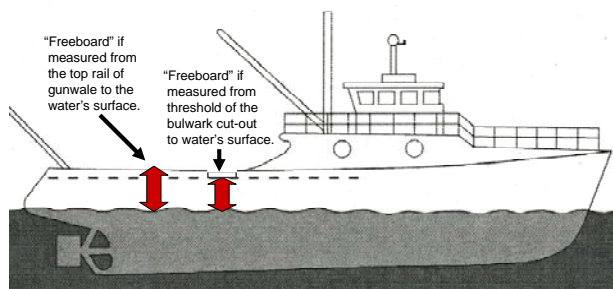
## Boarding Ladder Requirements

The National Marine Fisheries Service (NMFS) recently published regulations requiring operators of domestic fishing vessels with a freeboard of greater than four feet to provide a U.S. Coast Guard-approved pilot ladder as a safe and enforceable means for authorized personnel to board fishing vessels in carrying out their duties under the Magnuson-Stevens Fishery Conservation and Management Act, the Atlantic Tunas Convention Act, and other applicable fisheries laws and treaties.

This new rule became effective January 1, 2009. NMFS took this action because many times, it was determined that the prior standards to "provide a safe ladder" proved to be inadequate. Boarding personnel were often put at risk during heavy seas and inclement weather. In some cases they had to provide their own ladder or abort the boarding. Lack of a safe means to board a vessel slowed down boardings and interrupted the fishing operations.

The new boarding ladder requirements and definitions can be found in 50 CFR Part 600, Sections 730 (a) (1) and (2), and (c) (3) and (4). The requirement applies to vessels with a freeboard of greater than 4 feet. Also, when an authorized officer or observer personnel requests it, you must provide a "pilot ladder" to enable them to embark or disembark the vessel safely. You must also provide a manrope or safety line, and illumination for the ladder, when necessary to facilitate the boarding or when requested by boarding personnel.

A "pilot ladder" (sometimes called a "Jacob's ladder") means a flexible ladder constructed and approved to meet the U.S. Coast Guard standards for pilot ladders as found in 46 CFR subpart 163.003 entitled Pilot Ladder.

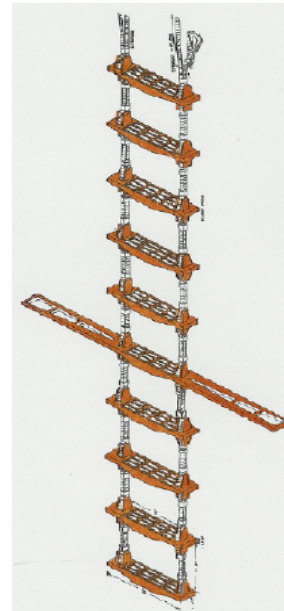


For the purpose of the boarding ladder requirements, "freeboard" is defined as the working distance between the top rail of the gunwale of a vessel and the water's surface. If a cut-out is provided in the bulwarks of a vessel for personnel boarding purposes, "freeboard" is the distance between the threshold of the bulwark cut-out and the water's surface. When the distance to the water's surface in either of these cases is 4 feet or less, a pilot ladder is not required, however, a safe boarding device is still recommended to be available.

Pilot ladders can be purchased from marine equipment suppliers or manufacturers. They can be obtained in various lengths and type construction. A custom-made ladder constructed of wood costs about \$65.00 per foot and one made of synthetic material costs about \$150.00 per foot. It is estimated that the total cost could range from \$650 to \$1500 for a new 10-foot pilot ladder.

As discussed, the new rule requires the use of a pilot ladder on all fishing vessels with a freeboard greater than 4 feet. With the new way freeboard is measured, some vessels that did not need to provide a ladder in the past will have to provide a ladder under this rule.

It also should be noted that "freeboard", as it applies to this rule, is measured at the time the vessel is boarded. It is a physical measurement of the vessel at the lowest point of sufficient width to accommodate a boarding. The measurement cannot be pre-determined at the dock or the marine architect's office, because the vessel's loading conditions (catch onboard, fuel state, etc.) and weather are constantly changing. It is the fishing vessel operator's responsibility to provide a pilot ladder when conditions exist that require one.



This picture shows the design features that are part of a safe pilot ladder.

- Rigid steps with non-skid coating.
- Flexible rope between rungs to reduce crushing injuries.
- Anti-twist rungs.
- Rounded edges to reduce damage to the vessel and for safety.
- Requires a spreader if more than 5 steps.
- Coast Guard approval # 163.003/4/0

Use of the ladder is not limited to facilitate boardings and observer transfer. It can also be used for vessel maintenance, retrieving gear from water, and boarding a life raft, as well as in a man overboard situation. However, the ladder must be maintained in good condition and kept clean.

For more information on fishing vessel safety, reference material, and links to other web sites, go to:

[www.FishSafe.info](http://www.FishSafe.info)

