

Chapter 9 Plan

Last updated 2025-03-19

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	Doc. No	Version	Valid from date
9.1 Publication of Marine Safety Plan	PMSC-0093	1	2024-10-21
9.1.a Publication of Plans and Reports	PMSC-0094	1	2024-10-21
9.2 Stena Line Marine Safety Plan Format	PMSC-0095	1	2024-10-21
9.3 Stena Line Marine Safety Plan-2024-2027	PMSC-0096	2	2025-03-19

9.1 Publication of Marine Safety Plan				
Version No. 1	Revision Date. 2024-12-11	Document ID. PMSC-0093	Page. 1	

MSMM chapter: 9.1

PMSC Reference: 9.1

Validity: All Harbour Authorities

Purpose

To demonstrate commitment to marine safety and to ensure the involvement of harbour users, all organisations should produce a marine safety plan.

Scope

All SLHAs marine operations, marine services, environmental responsibilities, harbour users and stakeholders safety responsibilities.

Definition

Elements of successful safety management are:

- effective safety policies setting a clear direction for the each SLHA to follow;
- an effective management structure and arrangements in place for delivering the policy;
- a planned and systematic approach to implementing the policy through an effective safety management system;
- performance is measured against agreed standards to reveal when and where improvement is needed;
- All SLHAs learn from all relevant experience and applies the lessons.

Together these elements constitute a continuous cycle over time, aimed at ensuring continued achievement of safety goals, and relevance of policies, plans and procedures; and continuous improvement in safety performance.

SLHAs make the following commitments:

- to manage the relevant assets of the authority safely and efficiently;
- to discharge existing statutory duties and powers;
- to maintain relevant harbour equipment to agreed industry standards;
- to recruit and train operational staff to nationally agreed competence levels; and
- to ensure that staff are properly trained for emergencies and contingencies.

Principles of the Safety Plan:

- All elements of the MSMS are monitored and audited by the Designated Person;
- The Duty Holder is overall responsible for compliance with Safety Plan;
- Commercial Pressure is managed within the SLHA Officers to ensure 'Safe and Efficient Operations' at all times;
- Compliance with the marine Safety Management System and Local SLHA Marine Operations Manual;
- Measuring performance against the Plan; and
- Audit and Review.

9.1 Publication of Marine Safety Plan				
Version No. 1	Revision Date. 2024-12-11	Document ID. PMSC-0093	Page. 2	

Publication

The plan will be updated annually and published on the local SLHA website.

Duty Holder Statement

The Duty Holder will publish an assessment of the marine Safety Plan every 3 years.

9.1.a Publication of Plans and Reports				
Version No. 1	Revision Date. 2024-12-11	Document ID. PMSC-0094	Page. 1	

MSMM chapter: 9.1.a

PMSC Reference: 9.1 – 9.2

Validity: All Harbour Authorities

Purpose

The Code provides detail on the way in which individual SLHAs should show commitment to maritime safety and to ensuring the involvement of harbour users. The Code requires a 'safety plan for marine operations' which should be published at least once every three years. SLHAs publish a three yearly safety plan for its marine operations. To demonstrate commitment to marine safety and to ensure the involvement of harbour users, all SLHAs will produce a marine safety plan.

Scope

All SLHAs policies, procedures and amendments that have been adopted to achieve the required PMSC standard.

Definition

The marine safety plan should illustrate how policies and procedures will be developed to satisfy the requirements of the Code. It should:

- commit the organisation to undertake and regulate marine operations in a way that safeguards the harbour/facility, its users, the public and the environment;
- refer to commercial activities, the efficient provision of specified services and the effective regulation of vessels including near miss reporting; and
- explain how commercial pressures will be managed without undermining the safe provision of services and the efficient discharge of its duties

Annual Review

An annual review of this plan is provided by the Duty Holder and published on the individual SLHAs website. The review considers each of the KPIs for the individual SLHA, namely:

- Marine risk assessment;
- Accident/incident reporting;
- Marine training records; and
- Oil spill training exercises.

Also Included within the annual review:

- a statement of the aims, roles and duties of the organisation as duty holder;
- the overarching policies and procedures of the organisation to achieve those aims, including the commitment to implement the Code;
- the objectives which support the overarching plans and policies;
- the means of measuring their achievement against those objectives;
- accordingly, a review of how far the organisation has achieved its aims and objectives;

9.1.a Publication of Plans and Reports				
Version No. 1	Revision Date. 2024-12-11	Document ID. PMSC-0094	Page. 2	

- changes it proposes to its policies and procedures; and
- the aims and objectives for the future

9.2 Stena Line Marine Safety Plan Format				
Version No. 1	Revision Date. 2024-12-11	Document ID. PMSC-0095	Page. 1	

MSMM Chapter 9.2

PMSC Ref 9.3

(Format for) Port Marine Safety Code Annual Performance Review: 20XX

Introduction

Stena Line is an international transport and travel service company with Europe's most comprehensive route network. Stena Line Ports Ltd (SLPL) is the Statutory and Competent Harbour Authority for the ports of Holyhead and Fishguard. In addition, SLPL is also the Statutory Harbour Authority for the 'Stena Line Stranraer Harbour' area and Stena Line Ports (Loch Ryan) Ltd is the Statutory Harbour Authority for Loch Ryan Port.

Stena Line Harbour Authorities are responsible to the SLPL Board for compliance with the Code.

As part of Stena Line's commitment to the Port Marine Safety Code (PMSC) this 'Marine Safety Plan' has been published to inform readers about SLPL's performance against the plan and its marine safety objectives for the coming year.

Commitment to the Port Marine Safety Code

Stena Line Harbour Authorities: Marine Policy

The 'Stena Line Harbour Authorities Marine Policy' provides the assurance that SLPL, as the Harbour Authority, consistently and appropriately addresses the requirements laid out in the Department for Transport (DfT) 'Port Marine Safety Code' ('the Code'). This Marine Policy has been prepared using the latest version of the Code and the Guide to Good Practice.

The Marine Policy describes how the Harbour Authority's overarching responsibilities in respect of the Code are designed and implemented. This Policy is delivered through SLPL's approach detailed within the 'Marine Safety Management System Group Manual' which provides the foundation for ensuring individual SLPL ports and harbours address the Code's requirements. Each port within the SLPL Group supplements this document with a local Marine Safety Management System (MSMS) which incorporates port specific operational manuals and plans."

Issued by the Duty Holder March 20XX

Audit and Review

Stena Line recognises that a robust Marine Safety Management System (MSMS) requires external and internal checks to ensure that its policies and procedures are implemented at each port. An annual internal audit is arranged at each port by the Designated Person, with results provided to the Duty Holder. An independent external PMSC audit is conducted periodically as recommended by the Code; or more frequently if the

9.2 Stena Line Marine Safety Plan Format				
Version No. 1	Revision Date. 2024-12-11	Document ID. PMSC-0095	Page. 2	

Designated Person deems it necessary. The last external audit was carried out by xxxxxxxx for all SLHA's.

MSMS Review and Updates

The current version of the Group MSMS was issued in April 2024 along with the individual port level MSMS documents. The MSMS is reviewed regularly to include lessons learnt from other ports, observations identified during audit and to incorporate recommendations and conclusions from relevant Marine Accident Investigation Branch investigations.

9.3 Stena Line Marine Safety Plan-2024-2027				
Version No. 2	Revision Date. 2025-03-19	Document ID. PMSC-0096	Page. 1	

Stena Line Ports - Ports and Marine Facilities Safety Code Marine Safety Plan

2024 – 2027



Reviewed October 2024

9.3 Stena Line Marine Safety Plan-2024-2027				
Version No. 2	Revision Date. 2025-03-19	Document ID. PMSC-0096	Page. 2	

Introduction

Stena Line Ports Limited (SLPL) has committed to comply with the requirements of the Ports and Marine Facilities Safety Code (PMSC), which includes the publication of a Marine Safety Plan.

This safety plan is a component of the 'Marine Safety Management System' (MSMS) and serves to support the continuing improvement of all aspects of the Stena Line Ports Harbour Authorities 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

SLPL 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 local Stena Line Harbour Authorities Websites marine websites:

Loch Ryan Port <https://www.lochryanport.com/>;

Holyhead Port [Holyhead Port Authority | Holyhead Port | Wales](#) and

Fishguard Port <https://www.fishguardport.co.uk/>.

This policy is supported by additional marine procedures covering training and LPS provision, as well as other corporate policies, particularly the Group 'Health, Safety and Environmental Policy' which underscores the SLPL commitment to safeguarding human health, ensuring safety, and preserving the environment across all our operations.

2 Continuous Improvement Plan

SLPL Harbour Authorities have 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 Ports and Marine Facilities Safety Code. The Continuous Improvement Plan supports this Marine Safety Plan (See Appendix)

3 Marine Procedures

Operational procedures within the SLPL Marine function are described in the individual Stena Line Harbour Authorities Marine Operations Manual (MOM) and supported at each port/marine location 'Standard Operating Procedures' detailing procedures which are specific to each site. All such manuals are reviewed on a regular basis by the respective Harbour Masters and marine staff.

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

9.3 Stena Line Marine Safety Plan-2024-2027				
Version No. 2	Revision Date. 2025-03-19	Document ID. PMSC-0096	Page. 3	

and making best use of SLHA'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 Safety Activities

Marine safety activities are divided between those undertaken at group level, and those undertaken at the local Harbour Authority:

The following activities are the responsibility of the Designated Person 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 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 or external audit and 'monitoring' when required, oversight of PMSC compliance on behalf of the Duty Holder, and identify improvement opportunities for all Stena Line Harbour Authorities 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 Designated Person or person appointed by the Duty Holder):

- 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.

9.3 Stena Line Marine Safety Plan-2024-2027				
Version No. 2	Revision Date. 2025-03-19	Document ID. PMSC-0096	Page. 4	

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

The targets on the following page support the ongoing improvement plan for SLPL Harbour Authorities. This plan is owned by the Designated Person 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	Annual internal auditing Biannual ‘Monitoring’	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 ratio of two potential (Near Miss) reports for every actual incident report made via MarNIS.	Q2 2025 Done - Docmap Report Form
6	Implement new MSMS when Ports and Marine Facilities MSMS and MOM’s along with new Guide to Good Practice in Marine Operations	On publication of new editions	Await Government date but expected Q2 2025
7	Continue to maintain a focus on defective pilot ladders	Ensure data around these incident categories are captured and reported through to MCA, engage with Pilot Association	Ongoing (to be reported to PMSC meetings)

9.3 Stena Line Marine Safety Plan-2024-2027				
Version No. 2	Revision Date. 2025-03-19	Document ID. PMSC-0096	Page. 5	

8	Implementation of Port Owned Small Craft SMS in compliance with Workboat Code Edition 3	Promote a management system that reflects best practice	Ongoing throughout year (Verified by audit)
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Appendix – Continuous Improvement Plan

SLPL as Harbour Authority for 4 separate Statutory Harbour Areas seeks to continuously improve the Authority's compliance with the requirements of the Ports and Marine Facilities Safety Code, and reduce all foreseeable risks associated with 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 SLHA group ports.

The improvement plan will be cyclical in nature and follow the sequence below:

#	Task	Detail
1	Plan Audit and Monitoring Schedule	Draft and issue in early January (via Docmap) the audit/monitoring schedule / plan for the year, including any specific themes that will be a focus during the year
2	Undertake Audits	Conduct audits and monitoring 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 SLHA's
4	Report	Produce a written report containing visit findings as soon as is practicable, and clearly summarise any actions that the port is recommended/required to take to ensure improvement.
5	Keep MSMS, MOM's 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 Stena Line Harbour Authorities are made aware of key improvement points and areas of best practice by appropriate means (via Harbour Masters, Marine Staff, Designated Person and Duty Holder)

9.3 Stena Line Marine Safety Plan-2024-2027



Version No.
2

Revision Date.
2025-03-19

Document ID.
PMSC-0096

Page.
6

7	Regularly follow up action progress	Regularly review due dates of identified actions and Designated Person to 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	If necessary adjust as per Duty Holder Requirements