Stena Line Ports Ltd



Port Marine Safety Code Annual Performance Review: 2023



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.

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 Ports Ltd: Marine Policy

The 'Stena Line Ports Limited 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 2022

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 Designated Person deems it necessary. The last external audit was carried out by an independent marine consultancy, ABPmer, in 2019 for Holyhead and Fishguard. The external audits for Loch Ryan Port and Stena Line Stranraer Harbour were carried out in February 2020.

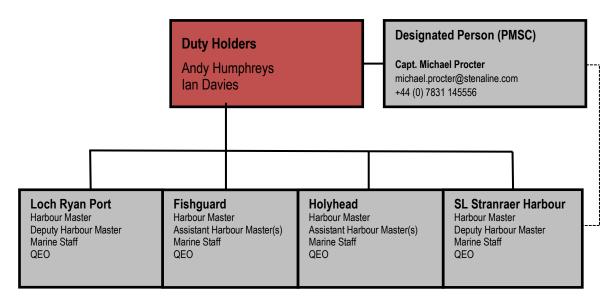
MSMS Review and Updates

The current version of the Group MSMS was issued in March 2022 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.



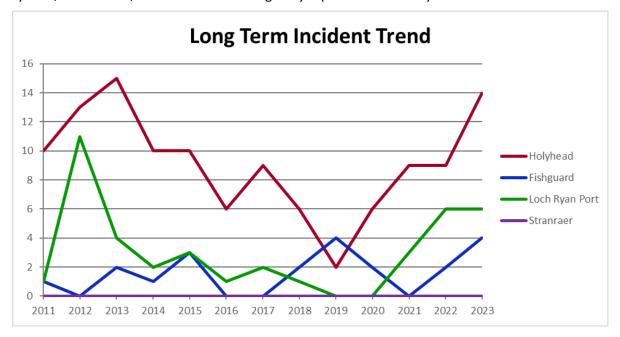
Key Personnel

The following groups and key personnel are responsible for the discharge of duties under the Code within the Stena Line Group.



Incident Statistics: Long Term Trend

Incident statistics and trends are key indicators of the effectiveness of a port's safety management system, and as such, these numbers are regularly reported to the Duty Holder.



The graph shows the long-term incident trend at each Stena Line port. During 2023 there were four recorded incidents at Fishguard, fourteen recorded incidents in Holyhead, and six incidents at Loch Ryan Port. No incidents were recorded at Stranraer Harbour. The Incident rate for Holyhead has seen an increase of five incidents since 2022 up to 14, whilst Ryan Port has remained constant at six incidents. Fishguard has a low fluctuating number of marine incidents with a peak of four in 2019 and 2023. Stena Line Stranraer Harbour is currently not in use so has not recorded any incidents.



Incident Type	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023
Close Quarters Situation		1	2	2						3	1	1
Collision ship - ship	1	1	1									1
Debris in water / seabed		1										
Equipment failure (port)	2	1									2	2
Equipment failure (vessel)	1	1		1					1			2
Fairway obstruction	2											
Fire/Explosion			1									
Fouled Propeller	1										1	
Grounding		1	1				1			2	1	2
Impact with structure	14	9	5	6	4	6	3	3	1	4	2	7
Injury - Harbour Works	1											
Mooring		2			1	2						
Mooring Breakout		2		1						1	1	
Other nautical safety				1	1		1	1	1	1	1	4
Pilot Boat Availability												
Pilotage Incident		1										
Pollution (Minor)			1	1	1						3	1
Pollution Tier 1							1					2
Pollution Tier 2	1						2	1				
Port Infrastructure Delay											1	
Reported Fender Damage				1								
Sinking and capsizing	1	1		1		1		1	3		2	1
Stranding				1								
Striking with ship (moored)			2	1		2	1			1		
Cruise Vessel											1	
Port Infrastructure Condition											1	1
Annual Total	24	21	13	16	7	11	9	6	6	12	17	24



The table of incidents provides the amalgamated incident classification from all four ports in the Group. This shows that the largest occurring incident type is 'impact with structure', the peak count of which occurred in 2012 with 14 recorded incidents. Other types of incidents demonstrate a low and fluctuating pattern throughout the 12-year period.

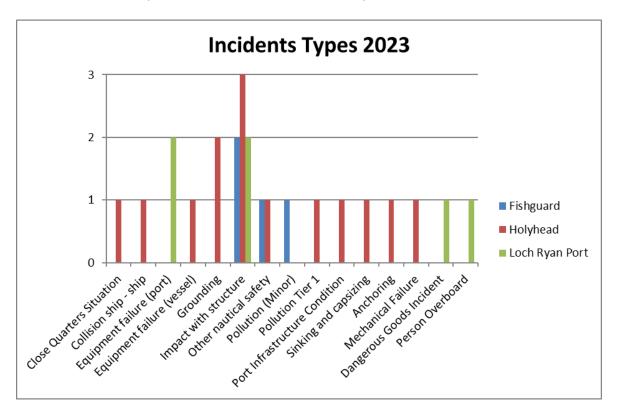
Incidents per 1,000 vessel movements is a standard industry measure of incident levels at ports. By using incidents per 1,000 moves there can be a comparison between ports and previous years despite varying marine traffic levels. The long-term incident per 1,000 vessel moves is shown in the table below.

Year	Holyhead	Fishguard	Loch Ryan Port	SL Stranraer
2015	1.490	1.473	0.244	0.000
2016	0.653	0.000	0.240	0.000
2017	1.377	0.000	0.967	0.000
2018	0.302	1.549	0.243	0.000
2019	0.168	2.136	0.000	0.000
2020	0.716	1.536	0.000	0.000
2021	0.987	0.000	0.743	0.000
2022	1.267	1.250	1.401	0.000
2023	1.763	0.338	1.475	0.000

Stena Line places particular emphasis on reporting potential incidents (including near miss and close-quarters situations) which are investigated and followed-up using the same procedure as actual incidents. This enables a review and/or creation of risk assessments with associated risk control measures to reduce the potential for an actual incident.

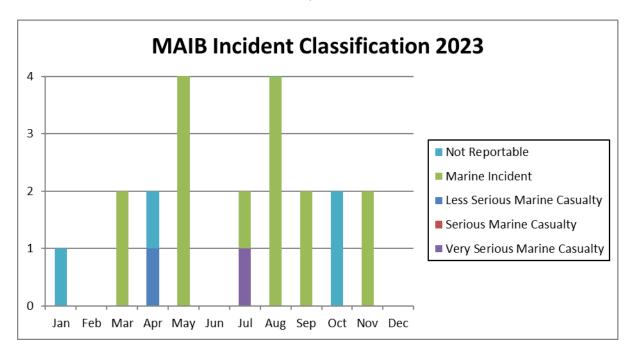
Incident Statistics: 2023

Incident statistics for 2023 are shown in the graph below. The most common type of incident at Stena Line Ports is 'Impact with Structure' recorded at Holyhead.





The following chart show the MAIB incident classification for the 24 records from 2023. These classifications are based on the severity of the consequences following an incident. There were one 'Very Serious Marine Casualty', no 'Serious Marine Casualties' one 'Less Serious Marine Casualty' and 16 'Marine Incidents'. Six incidents were 'Not Reportable'.

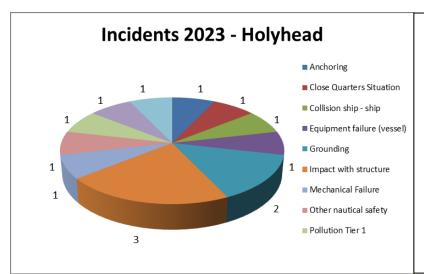


The following table shows the incident rate per 1,000 ship movements for each port, presented alongside the corresponding vessel movement totals for each port. It should be noted that Stena Line Stranraer Harbour (the pier structures) are prohibited for mooring; vessels transiting through the Statutory Harbour Authority area do not appear in the port's statistics

Port	Number of Incidents	Number of Vessel Movements	Incidents per 1,000 Vessel Movements
Holyhead	14	7,942	1.763
Fishguard	4	11,826	0.338
Loch Ryan Port	6	4,068	1.475
SL Stranraer	0	0	0.000

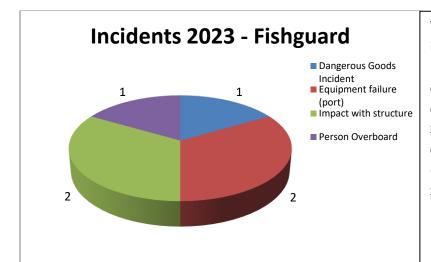


Holyhead 2023



The Incident chart for
Holyhead shows there have
been a total of 14 incidents
in 2022. There were three
occurrences of 'Impact with
Structure' incidents and two
occurrences of 'Grounding'
incidents. The remaining
incidents all had an
occurrence amount of one.

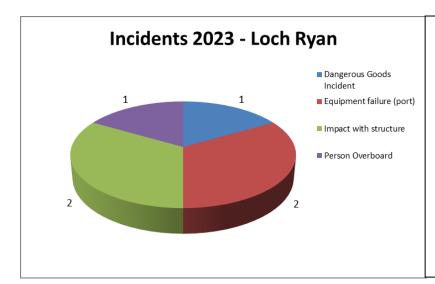
Fishguard 2023



There were four reportable incidents recorded at Fishguard during 2023. Two of the incidents were categorised as 'Impact with Structure' and one each categorised as 'Pollution (Minor)' and 'Other Nautical Safety'.

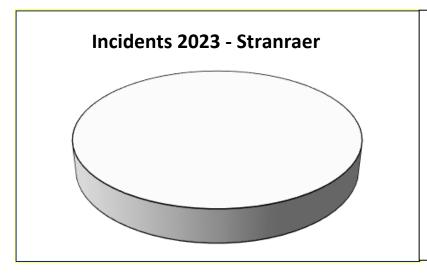


Loch Ryan Port 2023



There were six incidents recorded at Loch Ryan Port during 2023. These included 2 'Impact with Structures', 2 'Equipment Failures (Port)', 1 'Dangerous Goods Incident' and 1 'Person Overboard'.

SL Stranraer 2023

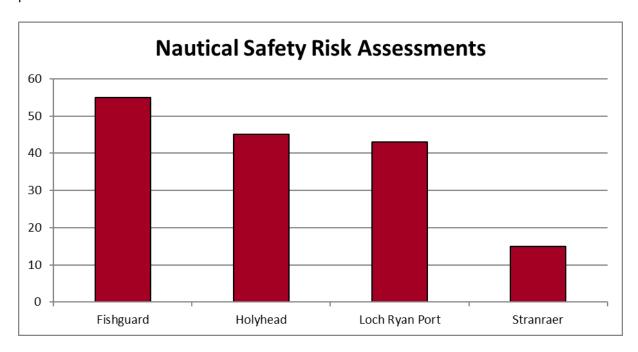


There were no reportable incidents recorded at Stena Line Stranraer Harbour during 2023.

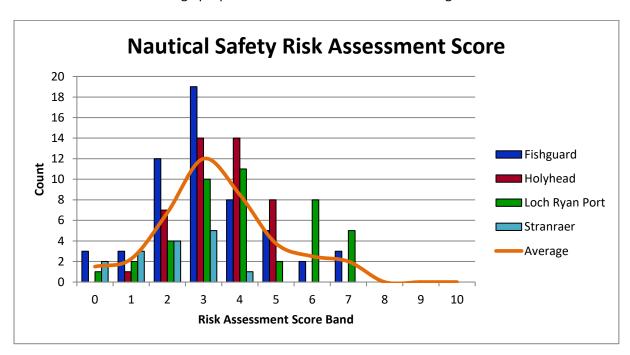


Managing Marine Risk

The chart below shows the number of nautical safety risk assessments at each of the Stena Line ports.



The chart below plots the frequency of risk assessments arranged by risk assessment score. The distribution shows that a large proportion of scores site at a mid-risk range of 2 to 4.





Aids to Navigation

Loch Ryan Port

SLPL is the Local Lighthouse Authority (LLA) for its statutory harbour areas. As such, SLPL has a duty to maintain marine Aids to Navigation and report performance to the General Lighthouse Authority (GLA). In discharging this duty in our ports, SLPL is inspected by the respective GLA and provides availability statistics.

The following table summarises the three-yearly availability statistics for each port in the Group.

IALA Category	and SL Stranraer Harbour	Fishguard	Holyhead	Target Availability (%)		
Category 1*	n/a	n/a	100%	99.8		
Category 2**	100%	86.8%	n/a	99.0		
Category 3***	n/a	98.9%	94.9%	97.0		
* Category 1. ** Category 2.	includes the lighted aids to navigation and racons that are considered essential for marking landfalls and primary routes. Category 2. An aid to navigation that is considered by the GLA to be of navigational significance. It includes lighted aids to navigation and racons that mark secondary routes and those used to					
*** Category 3.	supplement the marking of primary routes. An aid to navigation that is considered by the GLA to be of less navigational significance than Category 1 and 2.					
GLA	Holyhead and Fishguard are located within Trinity House Lighthouse Authority (THLA) area; Loch Ryan Port and Stena Line Stranraer Harbour are located within the Northern Lighthouse Board (NLB) area.					

Fishguard category 2 failed to meet the target availability with and 86.8% over the last three years and Holyhead category 3 AtoN failed to meet the threshold of 97% by 2.1%. Category 1 at Holyhead and category 2 at Loch Ryan achieved 100% availability.



Goals, Plans and Objectives

The goals, plans and objectives of Stena Line are published, in accordance with the requirements of the PMSC. This plan covers the current year, with a forward look at objectives to enhance or improve marine safety culture, understanding and delivery.

The following table identifies currently planned objectives and replaces the previously published version.

Existing Goals

Number	Description	Objective	Timescale	Progress	Status
1.	The Duty Holders to review how technical compliance with the Code translates into practical compliance	Identify shortfalls in how they have managed their assessment of performance to ensure safe marine operations, and implement any corrective actions identified	Q4 2023	The Duty Holders	Duty Holder has commenced full review, expected completion Q2 2024
2.	Review skills and experience of key operational staff	To ensure that the appropriate level of professionalism and support is available for all foreseeable tasks	Q4 2023	The Duty Holders	Ongoing, Competence levels assessed, no non Marine personnel involved marine and navigational safety and training Matrix will be updated Q2 2024
3	Review of Company and Local MSMS	Develop MSMS such that the Systems are better aligned to the practical safe delivery of marine operations	Q4 2023	The Duty Holders	In hand but awaiting final 'Ports and Marine Facilities Code' expected Q1 2024
4	Port of Fishguard MSMS to be reviewed for functionality	Clearly identify how the Port Manager delivers (through delegation if required) their responsibility in regard to maintenance and operations	Q4 2023	The Duty Holders	Subject to Board approval seeking local qualified Deputy Harbour Master for Port of Fishguard. Expect response. Some training will be required. End Q1 2024



Number	Description	Objective	Timescale	Progress	Status
5	Port of Fishguard MSMS to be revied for guidance	The Fishguard MSMS to include guidance and 'sign posts' as to how and where operational controls and maintenance plans can be found	Q4 2023	The Duty Holders	Operational Controls will be uploaded to Docmap MSMS on a 'search' basis. Maintenance plans will be uploaded to new Ports Planned maintenance System. May 2024
6	Capture any skill shortages within the organisation that may occur when a post is not filled from time to time for any reason of extended absenteeism	Consideration should be given to raising non-conformances as a suitable way of capturing any future deviations and allow for the formal identification of temporary control measures	Q4 2023	The Duty Holders	New SMS will dictate requirements with provision for unplanned absenteeism. Nonconformances issued will be monitored by the Fleet Operations Safety Team. Q2 2024
7	Resource a 'Competent' Manager where a significant management resource required	Where projects that require significant management resource to complete an internal or external project a 'Competent' manager knowledgeable and experienced in the task is appointed as a requirement of the Stena Line Group MSMS	Q4 2023	The Duty Holders	New MSMS will require 'Competence' for all tasks which will require Formal Risk Assessment, Formal Safety Assessment and Method statements as applicable. Within that it is expected the Harbour Masters will contact the Duty Holder and/or the Designated Person for advice if required. Q2 - 2024



Number	Description	Objective	Timescale	Progress	Status
8	Audit Process	The Duty Holders to review the current audit process for practicality	Q4 2023	The Duty Holders	New audit checklist for both Group and Local Harbour Authority under construction. Local 'Monitoring' by the Designated person will take place every 4 months with intermediate annual internal audit Q2 2024
9	To align and integrate the applicable requirements of the Stena Line Port and Terminal SMS with the Stena Line Group and Local MSMS'	To include requirements, but not be limited to, the MSMS (e.g., 'Stop the Job' or, control of contractors through appropriate referencing)	Q4 2023	The Duty Holders	Provision within the new MSMS for interface. 'Stop the Job'. LMRA (Dynamic R.A.), Control of Contractors instructions contained. Q2 2024
10	Review of the current Technical Services	To support structure to Fishguard with a view to direct support as required for Marine activities	Q4 2023	The Duty Holders	New Technical Services Manager appointed in Holyhead and Port Engineer appointed in Birkenhead. Harbour Masters have access. Closed
11	Local Port Emergency Plans	To integrate the Company Emergency Procedures with the local Port Emergency Plans	Q4 2023	The Duty Holders	MSMS will use Local Port Emergency Plan with direct contact to the Fleet Operations Safety Department incorporated. Q2 2024

Summary Statement

This statement demonstrates that Stena Line Ports Ltd, as the Statuary Harbour Authority, is commitment to operating in compliance with the requirements of the PMSC.

Our development plan highlights our continuing dedication to continual improvement through an increase in safety levels at our ports and within our marine operational teams.