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IMPA Notice: 1001

23 August 2024

Dear Members,

THE ASSOCIATION'S INTENTIONS FOR ADDRESSING INTEREST IN REMOTE PILOTAGE

Situation

IMPA is seeing increasing enquiries about how maritime autonomous surface ships (MASS) navigated by software with autonomy or from a remote operations centre (ROC) would comply with mandatory pilotage requirements.

There is also evidence of resurgent interest in new operational practices in conventional piloting in some countries and forums. The motivations range from government technology policy to competition and from shortages of maritime pilots to emissions reductions and occupational safety.

As a result, remote pilotage as an alternative to the presence of a qualified, licensed maritime pilot on the bridge of a ship is being discussed as having a role in piloting conventionally navigated ships and maritime autonomous surface ships.

Position

Maritime pilotage is a public service that delivers an x528 reduction in risk (TEMS, 2022) relative to not taking a pilot and tugs. It has an incident rate of 1.54×10^{-5} incidents per act of pilotage (based on IGP&I, 2020) or 1.54 incidents per 100,000 acts of pilotage. Today, in mandatory pilotage areas, the only accepted practice that achieves this level of performance is the presence of a qualified, licensed pilot on the bridge of a ship.

Where pilotage involves directing the navigation of a ship from shore or another vessel today, it is not an alternative to embarking a qualified, licensed pilot for the most high-risk phases of an act of pilotage. The practice serves a limited but clear purpose and does not require pilotage services or the industry to invest in additional specialised infrastructure.

Proposed alternative operational practices in mandatory pilotage waters must demonstrate that they can cost-effectively achieve the level of performance outlined above. IMPA opposes any operational practice that reduces the probable or actual performance of pilotage as a public service.

Action

The Executive Committee held an extraordinary meeting (EEC 1-24) on 20 June 2024 to discuss this situation and to agree on actions to be taken. A fact-finding mission to Denmark, Belgium and Finland followed. The Executive Committee consensus is that unless IMPA reacts proactively to interest in remote pilotage, other organisations may become authorities on its role, if any, in the future of pilotage and our profession. For the Association, this is an unacceptable risk.

The Executive Committee is unanimous in its commitment to ensure that IMPA provides its Members with the tools and evidence they need to advance their interests when faced with local or national proposals to adopt remote pilotage in mandatory pilotage waters.

Consequently, the Executive Committee approved IMPA conducting a self-funded, evidence-based project to study remote pilotage in mandatory pilotage waters. The *R-Pilot* project is intended to:

1. Define the functional requirements and expected performance of effective systems of maritime pilotage;
2. Develop a risk assessment methodology for evaluating modifications to operational practices in maritime pilotage, including remote pilotage;
3. Using the expertise of the international community of maritime pilots, conduct a hazard identification and risk assessment exercise to examine remote pilotage in mandatory pilotage waters;
4. Validate the results of the comparative assessments using operational trials; and
5. Provide pilots' organisations, competent authorities, and industry stakeholders with a technology-agnostic authoritative source of objective evidence of the implications of remote pilotage in mandatory pilotage waters, including related matters such as cost-effectiveness and social acceptability.

The operational trials will take place principally in Canada because of the great diversity and significant seasonal variations in environmental conditions. To facilitate the *R-Pilot* project, IMPA has signed a Memorandum of Understanding with the Canadian Coast Guard and the Canadian National Centre of Expertise on Maritime Pilotage (NCEMP) to enable this.

IMPA's intentions and the Memorandum of Understanding will be communicated to the maritime community via a press release on 27 August 2024.

Conclusion

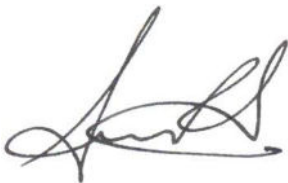
Our Association will not promote remote pilotage as an alternative to the presence of a pilot on the bridge of a ship. However, we cannot be silent or oppose the concept by asserting that it is not pilotage.

IMPA considers it critically important that any concept that could impact compulsory pilotage practices and systems, including remote pilotage, be carefully examined and assessed. By conducting a robust, evidence-based study into remote pilotage in mandatory pilotage waters, IMPA ensures that it remains the international authority on all questions regarding maritime pilotage and our profession. The Association also ensures that our Members have the tools and evidence they need to advance their interests if or when faced with local or national proposals to adopt remote pilotage in mandatory pilotage waters.

The Executive Committee welcomes your support, but if you have any questions, please do not hesitate to contact me directly.

Action: Members are invited to note the information provided on the actions to be taken by the Association.

Yours sincerely,



Simon Pelletier
President