AUSTRALASIAN
MARINE PILOTS INSTITUTE

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1. Preamble

1.1. Marine Legislation for declared ports and compulsory pilotage areas, including the Torres Strait and Great Barrier Reef, usually requires vessels over a stipulated size to engage a licensed Marine Pilot. In some cases, provision in legislation allows for exemptions under specific conditions, provided the Ship Master or Officers are holders of a Certificate of Local Knowledge (CoLK) or Pilotage Exemption Certificate (PEC).

1.2. Pilot exemption certificate holders will, through training and assessment, have met the requirements of the appropriate authority to navigate a vessel or vessels within pilotage waters without a marine pilot onboard. A qualified Master or officer will have been issued with a pilotage exemption certificate (PEC) as a legal document exempting the certificate holder from the legislated requirement to engage a marine pilot.

1.3. In recent years the ATSB has released marine investigation reports related to incidents involving PEC holders. Potential impacts to port operations, port assets/infrastructure, vessel safety, the environment and critically, safety of life at sea are ever present, whilst the risks arguably mirror those for marine pilots. These risks should be mitigated through sound training, licensing and verification processes set by regulators.

1.4. The Australasian Marine Pilots Institute has amended the membership charter to specifically encourage PEC holders as Associate Members, to support their participation in ongoing Continuous Professional Development.

2. Current Situation in Australia

2.1. Training and skill requirements for PEC holders across Australia vary. In some jurisdictions they are the responsibility of the State or Commonwealth marine licensing authority, and in other cases the local Port Authority. PEC requirements are often contained within the same legislative or regulatory framework which govern marine pilot training and licensing.

2.2. Across Australian jurisdictions, the training and assessment requirements, prior to the issuance of a PEC are inconsistent. Some authorities utilise blank chart examinations, which historically have been used as a measure of port knowledge. Others require a specified number of mentor/supervised trips, under the guidance of an existing PEC holder or marine pilot, during which knowledge is hopefully passed on, occasionally with no formal assessment or exam to assess that transference of knowledge.

2.3. Some jurisdictions have a training syllabus which covers a base level of knowledge, although again this is not universal. Short courses, simulation, tug observations and VTS familiarisation requirements vary across jurisdictions. Short courses and simulator requirements are not commonly imposed for PEC holders, possibly due to the financial impost on operators, and a perceived lower level of risk bought about by the familiarity of a PEC holder with their vessel and operation.

2.4. On water assessments are a common method to assess the practical ship handling ability of the PEC applicants. Such assessments are universally completed by a licenced check pilot for the jurisdiction being assessed, with the timeframe for renewal verification varying between 12 months and 24 months.

3. Risk Mitigation, Pilot Exempt Master Training and Qualifications

3.1. To adequately mitigate the risks from marine pilotage exemption operations, the regulatory framework must adequately prepare a candidate with the requisite skills and abilities to manage operational risk when unsupervised and operating within the holistic port system. It cannot be assumed that by virtue of nomination by their ship operator, a candidate has previously acquired the supplemental skills and abilities needed to safely operate a vessel within compulsory pilotage areas.

3.2. Pilotage Exemption Certificates should only be issued for a particular vessel, or vessel type. Where a PEC holder requires additional vessels which are not substantially the same to be added to their PEC, consideration should be made of the design, displacement, power to weight ratio and the manoeuvring characteristics of the vessel. Where the differences are significant, additional assessment elements should be considered to ensure that the PEC holder is competent.

3.3. PEC holders should satisfactorily complete training modules which cover theoretical and practical elements to cover both normal and abnormal/emergency operations. The practical implementation of the theory should be assessed against known criteria in a consistent and rigorous manner.

3.4. A comprehensive risk control assessment contained within the safety management system for the operations should identify risks to the operation and mitigations to control all identified risks. Risk mitigations, if so identified, should include structured training programs for PEC candidates to learn and subsequently apply those skills when required.

3.5. State, Commonwealth or local regulatory bodies should set a benchmark for comprehensive PEC training programs, including all elements required of marine pilot licence holders within the same jurisdiction for equivalent operations. Operators of pilotage

exempt vessels may then apply for exemptions from certain elements based on their risk control assessment.

Example 1: A tug and barge operator may apply for an exemption from full mission contingency simulation, however, may identify that practical training in recovering from a broken tow wire in adverse weather conditions is a skill which is required.

Example 2: An anchor handling tug supply (AHTS) vessel operator may apply for an exemption from towage familiarisation, observations and training requirements.

4. Position

4.1. Regulatory bodies should include the following elements when assessing a PEC applicant:

i. Minimum federal/statutory marine qualifications (ie. Certificates of Competency) based on the vessel/s the PEC pertains to.

ii. Health Assessment - a Certificate of Medical Fitness which meets the requirements of Marine Order 76 as a minimum.

iii. Clear requirements for a PEC applicant's supporting company to define who is to deliver the training identified in the risk control assessment.

iv. The syllabus and method for assessing knowledge as it pertains to port operations, the local conditions and environment.

v. The syllabus and the method for assessing theoretical knowledge as it pertains to the vessel/s for which the PEC is being applied.

vi. The method for demonstrating practical skills and knowledge. This would be in the form of check trips. This formal assessment, which may include multiple check trips, should take place using commonly understood assessment criteria and provide opportunities for training feedback.

vii. The syllabus and method of assessing response actions to contingencies identified in the formal risk control assessment.

4.2. As a minimum, training for PEC applicants should include the following:

i. Formal assessment of, and understanding of, port infrastructure including harbour and channel layout, port procedures and ATONs as it pertains to the PEC being applied for.

ii. Bridge Resource Management Training.

iii. ECDIS or type specific PPU training.

iv. Observation trip/s with a licensed marine pilot covering the full pilotage the PEC application applies to, including ship handling principles and practical knowledge, or;

v. Observation trips with a current PEC holder covering the full pilotage the PEC application applies to, including specific detailed ship handling guidance and knowledge of the vessel/s the PEC will apply.

vi. Demonstration and assessment of application of port knowledge, environmental conditions, bathymetry and topography as it pertains to the operation for the PEC holder.

vii. Tug observations on same or equivalent operations.

viii. VTS operation observation.

4.3. Additional elements that may be included in training for PEC applicants, subject to requirements of a detailed risk control assessment:

i. Ship handling training relevant to the PEC being applied for.

ii. Simulator based emergency and contingency training.

iii. Simulator based training.

iv. Manned model training.

v. Advanced marine pilotage training.

vi. Port, vessel or operational specific risk-based training.

vii. Crisis management and human behaviour training.

viii. Human factors training.

ix. Check pilot training.

x. Tug Knowledge training.

4.4. Companies who employ applicants for PECs should:

i. Complete a formal full risk control assessment of the pilotage operations and identify risk mitigations which apply within their operations.

ii. Complete a training needs analysis based on the risk control assessment completed.

iii. Train all their employed PEC holders to the standard identified in the training needs analysis.

iv. The identified training needs analysis shall identify initial training required when first sailing as a PEC holder, and ongoing, periodic training to improve resilience of the operations through continuous professional development.

4.5. Pilot Exempt Certificate holders should:

i. View and analyse the risk control assessment of their employer including participating in reviews.

ii. Complete all training as per the training needs analysis of their employer.

iii. Follow all requirements as defined by the Regulator for the area their PEC certificate applies.