

# Association of Marine Pilots of Ireland



**AMPI**

ASSOC. MARINE PILOTS IRELAND

Submission on National Marine Planning Network  
November 2018



Panamax vessel inbound for Rusal Aluminium on the Shannon Estuary

## **Introduction**

### **1.1 Who are AMPI**

AMPI is an acronym for the Association of Marine Pilots of Ireland. We are a professional association of marine pilots who have members from all the main ports in the country. We promote best practice among members in an effort to provide ship masters, shipowners, port authorities and the general public with as safe as possible way of getting ships from into and out of port while protecting the environment and infrastructure.

### **1.2 What are pilots**

Pilots are individuals who board ships with the main objective of guiding a ship from sea into port or from port back to sea. Our members will generally have unlimited ships masters certificates and have experience of sailing as a ships master. We are expert ship handlers and have intricate knowledge of the rivers, harbours and docks in which we serve.

To attain an unlimited ships masters certificate generally takes many years of working on ships at sea and gaining experience while moving through the ranks on board. The quickest time in which this can be accomplished is approximately seven years.

Then after getting appointed to the position of pilot it takes more time working within a port to get from the level of a trainee pilot to an unlimited pilot. This can take anywhere from two to four years.

### **1.3 Pilots & Irish Ports**

Pilots in Ireland are governed by the Harbours act and local port byelaws. There are two methods prescribed in the harbours act in how pilots are engaged by Port companies. They are either employees of the port company or are licenced by the port company.

The Port of Cork(the only port in Ireland to have done so) have signed up to a quality standard for pilotage. The ISPO (International Standard for Maritime Pilot Organisations) is a standard of best practice for pilots and pilot organisations, improving safety and quality. Providing self-regulation and transparency in pilotage standards to all port related stakeholders. This standard can be best described as quality standard similar to ISO9001 quality management standard.

### **1.4 Benefits of Pilots to Ireland**

Though applying a service directly to the shipowner it is the view of our association that pilots are best seen as public servants in the true sense. We fulfil the obvious role of getting ships from one position to another during what is classed as the the riskiest part of a ship's

voyage. However we do this in a manner that protects the marine environment, port and civil infrastructure. There are also other stakeholders which tend to get forgotten about who use our waterways like yacht clubs and rowing clubs that we deal with on a daily basis.

#### **1.4.1 The Marine Environment**

Pilots Regularly navigate vessels safely in and out of the state that are carrying many different, vital, yet environmentally hazardous cargoes from petroleum products to chemicals like caustic and sulphuric acids. All ships pose a threat to the environment as they require large amounts of oil to burn as fuel. The larger ships we safely navigate can carry to 3000000 litres of their own fuel. The potential for disaster to not only resident wildlife but also shellfish beds and fish farms is huge should any ship have an accident.

#### **1.4.2 Port and Civil infrastructure**

The ships which enter the state have the ability to damage port infrastructure like piers and jetties but also civil infrastructure like bridges. Ships tend to be so large, with huge momentum, that if they are not manoeuvred correctly the resulting damage can be catastrophic even from an impact at low speed.

#### **1.4.3 Other Stakeholders**

Ireland has a long-standing tradition of water sport. The Royal Cork Yacht Club and The Royal Yacht Club of Ireland in Dun Laoghaire, just to name two, are world renowned in sailing terms. The O'Donovan brothers of Cork, who represented our country so well at the last Olympics in Rio are just a few examples of other stakeholders that use our waterways.

In the normal course of our duties pilots regularly meet with yachts and rowers and endeavour to keep these groups safe. We respect the right of these groups to use waterways and we have members that are active sailors themselves.

### **1.5 Pilots Public Obligation**

*As per SI 656 of 2010 19. (1) If a pilot engaged in berthing or unberthing a ship in the state, or engaged on a ship bound for a port, in or in transit to, another member state, learns in the course of the pilot's normal duties that there are apparent anomalies which may prejudice the safe navigation of the ship or which may pose a threat or harm to the marine environment, the pilot shall immediately inform the competent authority by the quickest means possible.*

The competent authority in this case is the Marine Survey Office.

### **1.6 Summation**

I hope it is apparent to the reader what a vital role pilot's play facilitating the transport of millions of euros worth of goods in and out of the country on a daily basis.

But it is important that the state realises the importance of putting a well-trained individual on board foreign vessels entering the country. Someone who not only knows the local waterways but has an inherent interest in protecting the environment and promoting trade. Also someone who is qualified to evaluate the ship, the crew and the ability of both to make the passage to or from the berth in a safe manner.

## **2.0 Submission**

The following recommendations the Association of Marine Pilots of Ireland feel will be in line with what the National Marine Spatial Plan hopes to achieve. We agree that it is imperative to have a clear and concise plan that will not alone be of benefit for all Irish citizens today but will serve future generations.

We are in a unique position to be able to advise ports and the state on what is needed for current demands but have the expertise and knowledge to know what will be required of Irish ports in the future as the global trend of larger ships shows no sign of slowing down.

A lot of Irish ports are already working at the maximum size of ship they can handle, so new and innovative methods of ship handling is a must to be able to cater for the ships of tomorrow. There is also the argument where we feel it prudent to build new infrastructure to accommodate ships of the future.

## **2.1 Standardised Framework for Pilot Training in Ireland**

It is the view of AMPI and its members that a standardised framework for training of pilots in Ireland is established in addition to the training already in place in our ports. We recommend that all pilots in Ireland are trained to the standards that are prescribed in the International Maritime Organisation IMO A960 "*Recommendations on Training and Certification and Operational Procedures for Maritime Pilots*".(Please find attached).

What we have found is that all ports in Ireland do not train pilots to a similar standard. This leads to potential gaps in knowledge and expertise with the people that are put in charge of navigating and maneuvering large ships in and out of our ports. Like all industries, the shipping industry is constantly evolving. Examples of this are the introduction of electronic charts, new propulsion systems and changes to navigating bridge team practices influenced by the airline industry. Therefore up to date training and professional development is also paramount for pilots. Also attached a recently released UK Marine Accident Investigation Branch Report on to the CMA CGM Centaurus heavy contact with a quay and shore cranes in Jebel Ali while under pilotage. This accident resulted in the damaging of the quay the collapse of two shore cranes and the injuring of ten people, one seriously. It shows the importance of bridge resource management and the need for continued training for pilots.

## 2.2 A Pilot should be a Board Member of Port Companies

In the maritime and port industries, the need for evolution and development has been unprecedented over the past ten years. Simply ships have been getting bigger. Globally ports have been having to expand and come up with innovative ways of being able to cater for bigger ships. Likewise, ship owners and naval architects are having to design vessels to a maximum size of the port in which they are trading.

Traditionally ports globally have spent a lot of money on dredging to deepen channels and berths to stay competitive. This is not so easy today as in some places it is not physically possible to go deeper. So what has been happening in shipbuilding is that ships have been getting longer, thus being able to keep up with the demand to carry more cargo.

Some ports in Ireland do not have board members with any experience in handling large ships. Pilots in these ports would be invaluable to the port companies and the state in advising board members what is possible with the current infrastructure available. They will also be able to provide advice on new infrastructure that will be required when catering for the ships of tomorrow.

We feel the state needs to support and where necessary fund ports to build infrastructure that will not only serve the needs of the Irish people today but long into the future.

## 2.3 Competition in Pilotage

The EU parliament in their Regulation (EU) 2017/352 on establishing a framework for the provision of port services and common rules on the financial transparency of ports have seen fit to exempt pilotage from the market access section of this regulation. However, they left in a caveat that should a member state wish to open pilotage to competition the can do.

We have made representations to DTTAS at a workshop in Dublin last February echoing the words of the rapporteur Mr Knut Fleckenstein on why the EU exempted pilotage from competition. His words are as follows *“Pilotage should be excluded from the chapter on market access as it is a service highly relevant for navigational safety. In its Resolution A.960, the IMO has recognized the important role that maritime pilots play in promoting maritime safety and protecting the marine environment. Furthermore, the IMO does not intend to become involved with the certification or the licensing of pilots or with the systems of Pilotage practised in various states, so it seems unjustified that the Union should.”*

Denmark can be used as an example as to why competition in pilotage does not work. Denmark has had competition in pilotage now for a number of years, with a few different companies competing for business. Competition did not work as there was too much duplication and just not enough profit. So the end result was that costs went up to the end user, the exact opposite of what the port services regulation is trying to accomplish. From 2019 Denmark will return to one company Danpilot, which is the state owned company.

We advise against pilotage being open to competition as it is going against the recommendations of the EU and we as a professional association believe it will not serve Irish ports or the Irish people well.

## **Conclusion**

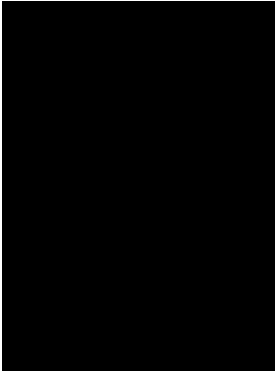
With 90% of world trade carried by sea, port infrastructure has always been essential to us as an island. With Brexit fast approaching, this will be even more so. We in AMPI believe that Pilots play a vital role in the logistics of seaborne trade. We feel that pilotage is too important not to have a standardised framework for training and continuing professional development. Pilots with their unique perspective and experience of the maritime industry can provide great assistance to ports right up to board level. Additionally, as pilots not only provide a direct service to shipowner,s but also an environment and safety benefit to the community. We agree with the EU Parliament that pilotage should be exempt from the chapter on market access in the European Regulation (EU) 2017/352.

## Contact Information

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