



SUB-COMMITTEE ON SAFETY OF  
NAVIGATION  
47th session  
Agenda item 6

NAV 47/6/1  
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**TRAINING AND CERTIFICATION OF MARITIME PILOTS AND  
REVISION OF RESOLUTION A.485(XII)**

**Submitted by the International Maritime Pilots Association (IMPA)**

**SUMMARY**

- Executive summary:*** This document comments on document NAV 47/6 submitted by INTERTANKO and other organisations. It is submitted by IMPA in accordance with the provisions of paragraph 46.5 of the Guidelines on the Organisation and Method of Work of the MSC and the MEPC and their subsidiary bodies (MSC/Circ.931/MEPC/Circ.366)
- Action to be taken:*** Paragraphs 7 and 8
- Related documents:*** NAV 46/15/2, NAV 46/15/4, NAV 46/WP.5

1 IMPA shares the desire of INTERTANKO and the six other organisations to find an acceptable way for the Sub-Committee to complete action on the revision and updating of Annex 2. Indeed, IMPA has been involved in substantive discussions with the Organisations over recent months. It is unfortunate that the deadline for NAV 47 papers precluded conclusion of those discussions. IMPA believe a consensus could have been agreed before NAV 48 had consultation continued. The submission of NAV 47/6 without conclusion to discussions means IMPA cannot support the document and must object to some of the substance of the draft Annex 2. The proposed Annex 2 restates previous proposals for pilots to provide written information prior to boarding that is available from other more appropriate sources of navigational information.

2 At NAV 46, the Organisations' proposals for pre-boarding written information from pilots and documentation of pilotage intentions were presented in a note (NAV 46/15/2) stating their objections to the draft Annex 2 adopted at NAV 45. A working group at the session considered those objections, as well as an alternative text offered by the Organisations, in depth. The working group made several changes to the Sub-Committee's NAV 45 draft to accommodate the wishes of the Organisations. The changes were suggested by the United States. Despite IMPA's consistent position that the proposed practices are unsafe and impractical, as explained in NAV 46/15/4, IMPA supported the working group's revised draft (NAV 46/WP.5, annex 2), which was neutral on the subject of pre-boarding written information and pilotage plans, in an effort to move the matter to completion.

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3 IMPA believed at the time, and still believes, that the product of the working group at NAV 46 was a reasonable compromise containing substantial concessions to the Organisations.

4 IMPA is mindful of the decision of the Chairman of the Sub-Committee at NAV 46 to consider the revision of A.485(XII) at NAV 47 only in plenary. The Organisations' suggested new Annex 2 is not suitable for adoption after only a discussion in plenary, however. It contains a great deal of new material and represents a departure from the existing resolution A.485(XII) as well as from all the previous drafts considered by the Sub-Committee during its efforts to revise Annex 2 over the last four years.

5 Since 1981, Annex 2 to resolution A.485(XII) has provided useful guidance confirming well-established general principles and goals concerning the operations of pilots. The revised version adopted at NAV 45 continued that approach. It reflected the current accepted best practices of the piloting profession while accommodating the variations among the pilotage systems of the world. The Organisations' new Section 3 would not be appropriate as part of a revised resolution A.485(XII).

6 The Organisations have stated that their proposals for expanded information exchanges and documentation of pilotage plans are derived from the new voyage planning responsibilities under resolution A.893(21) and other IMO instruments. The Organisations have asserted that the voyage planning requirements, at least for the portions of a voyage in pilotage waters, are excessive and may require information that is not readily available to the master. IMPA sympathises with the Organisations on this issue but believes that it would not be fair or practicable to expect pilots and pilotage authorities to solve those problems by assuming the ship's voyage planning responsibilities for the portions of a voyage in pilotage waters. In addition, IMPA has reviewed the voyage planning requirements carefully and is convinced that the information and documents that the Organisations suggest should be provided by pilots are not necessary for compliance with those requirements. Nevertheless, IMPA shares the Organisations' concerns for unreasonable or impracticable voyage planning requirements and would support a request by the Sub-Committee that the MSC initiate a re-examination of the voyage planning requirements.

#### **Action requested of the Sub-Committee**

7 The Sub-Committee is invited to accept the revised draft Annex 2 of resolution A.485(XII) developed by the working group at NAV 46 (NAV 46/WP.5, annex 2) for submission to STW 33 for finalisation.

8 The Sub-Committee is invited to ask the Committee to include on the future work programme of the Sub-Committee a re-examination of the voyage planning requirements for ships and masters for the portions of a ship's voyage while in pilotage waters (resolution A.893(21)).