

The following comments are made by the International Maritime Pilots Association, a UN recognised NGO in consultative status at the International Maritime Organisation for over 45 years. We are a professional technical body with unrivalled knowledge and experience of Maritime safety systems as they pertain to Port entry, ship manoeuvring and communications.

We note the desire of the Netherlands Government to amend its legislation in respect of Pilotage. We have no intention or desire to comment on the minutiae of the wording so far proposed, but we do have grave concerns as to the general concept of :

- a) Amending a system which demonstrably works well at present, and
- b) Proceeding on a path without clear objectives and methodology with no risk assessment having taken place.

The Government of the Netherlands has obligations under a number of conventions, most notable of which is SOLAS (Safety of Life at Sea). IMO expects its contracting member states to provide safety systems such as Pilotage, Aids to Navigation and VTS using the criteria of volume of traffic and degree of risk.

We are unclear where there has been any risk assessment/analysis to justify changes to what is generally considered a very satisfactory system from a safety standpoint. Where there are changes to an existing operationally interdependent system, the impact of altering some elements needs to be carefully studied and thought out to avoid unintended consequences.

The obligations in IMO Resolution A960 are for Nations to administer safe and efficient Pilotage systems. To achieve this, and to also effect change needs data and evidence we do not currently see.