

Fiskeri- og kystdepartementet  
Att: Kim Ove Liaker  
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Your ref: 13/532-

Our ref:

Longyearbyen, 02.09.2013

## **Hearing: NOU 2013:8 “Med los på sjøsikkerheten” – the pilotage regime in Norway**

Reference is made to your letter of June 6<sup>th</sup> 2013, where we are invited to comment on the Official Norwegian Report regarding the pilotage regime in Norway, its extent, organization and regulations.

AECO are grateful for the opportunity to comment on the report. We do notice, however, that interested parties and industry organizations were invited to a dialogue-meeting in Oslo, October 22 last year, and regret that we were not on the list of invitees. With our approx. 25 passenger vessels, most of them subject to pilotage requirements in Svalbard, such a meeting would have been very valuable.

The national pilotage requirements were made applicable in Svalbard only a couple of years ago. Parts of the local regulations have not come into force yet, and there are issues in the proposals we therefore have limited experience with.

It is our understanding that most of the proposals represent a softening of present regulations and e.g. involve:

Proposal to change the pilotage requirements for passenger vessels from the present 24 meters to 50 meters - and 70 meters as long as the passenger vessels is not carrying passengers. ***AECO supports this part of the proposal.***

Proposal to soften-up the Pilot Exemption Certificate (PEC) scheme for the smallest vessels by introducing 3 classes of the PEC, where class 3 apply to vessels 100 meters long or less, class 2 to vessels 100 – 150 meters long – and class 1 for navigators with exceptional competence who can apply for PEC for vessels longer than 150 meters. Class 2 is similar to present PEC- requirements but the proposal is to soften-up the test-part of the scheme. ***Even if such a scheme represents a more complex system than present system, AECO supports this proposal. It will represent a small change for vessels size 100 – 150 meters and make it easier on smaller vessels. Not at least will it represent an opening for vessels larger than 150 meters, whose navigators have extensive experience – to apply for PEC.***

***As the Ministry may have noticed, present regulations have had drastic consequences for the conventional cruise traffic in Svalbard this season and Ny-Ålesund has been visited by only 25 000 passengers compared with 40 000 passengers last year, due to new pilotage requirements.***

Proposal to reorganize the Pilotage Service administrated by the Norwegian Coastal Administration (NCA), to make a clearer difference between operative and management tasks – and to leave the PEC tests to an assessor instead of NCA. ***AECO's members have limited experience as the pilotage requirements in Svalbard are quite new. We have registered a certain difference in regards to how the PEC-tests are carried out, and agree that such a scheme must be streamlined. We do, however, not have strong opinions on the organization.***

Proposal to remove the duty to pay pilot readiness fee for vessels with PEC. ***AECO highly supports this proposal as present duty to pay this fee does not make sense and adds to already high costs for the operators.***

Generally we are in support of all measures that aim at making operations easier and less expensive, if safety is not at risk. With limited experience with present regime, we are not able to comments on all sides to the proposal. We will however underline that we have trust in the large working-group that has been responsible for this proposal and we therefore recommend the Ministry to take advise from the working-group.

We would also like to take this opportunity to encourage the Ministry to again and further consider the new pilotage regulations in Svalbard – and which consequences it has proven to have for the sailing patterns and local activity and income (ref. Ny-Ålesund). The experiences so far may point in direction on not foreseen and unwanted consequences and may call for revision of present regime.

Again, thank you for the opportunity to comment on this proposal.

Kind regards,



Frigg Jørgensen  
Executive director

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*Svalbard Tourism*  
*Cruise Norway*  
*CLIA Europe*  
*CLIA International*