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Ministry of Transport and Communications
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REVISION OF PILOTAGE ACT IN NORWAY

HEARING RESPONSE FROM EMPA

Dear Sirs,

EMPA, the European Maritime Pilots' Association, is a professional, non-profit organization, with office in Belgium since 1963. EMPA represents more than 4 500 maritime pilots from 25 European countries, with the aim of promoting efficient and safe pilotage in European ports and fairways. EMPA has been appointed by the European Commission as a member of the European Ports Forum.

We have noted the initiative of the Norwegian Ministry of Transport and Communication to amend the Pilotage Act with the aim of allowing operation of autonomous ships in Norwegian coastal waters that are subject to national pilotage regulations.

We kindly ask that the following hearing response from EMPA will be taken into consideration in the forthcoming legislative processes:

- EMPA regards it as positive that new technology and higher degree of automation is introduced into the shipping industry. This is indeed an evolution that has been going on in the industry for decades, and something that maritime pilots have been promoting and utilizing. Modern ships today are significantly more sophisticated and advanced than was the case just a few years ago, as are the tools used by pilots in their work.
- EMPA assumes that other legislation (apart from the Pilotage Act) that govern shipping activities in Norwegian and international waters should also be amended in order to prepare for autonomous shipping. (Eg. International Rules of the Road, Shipping Act, etc)
- EMPA acknowledges that new technology and higher degree of automation could entail both advantages and challenges:
 - Advantages in form of potential productivity and safety gains.
 - Challenges in form of need for revised operational procedures, changed and improved competence standards of seafarers, and transition challenges resulting from introducing new technologies and procedures to the world's existing large and highly diversified merchant fleet – as well as to others users of the coastal waters (pleasure craft, fishing vessels, etc).

- Pilotage entails that a licensed pilot, who is a local specialist in shiphandling, navigation and local matters, gives advice on the bridge of the ship to the captain and the crew, when the ship undergoes the most risk exposed part of her voyage. National and international lawmakers have acknowledged that pilotage provides an essential and unique service to the shipping industry, that is important for maritime safety and security, the protection of the environment and the efficiency of ports.¹ EMPA would like to emphasize on the security and efficiency challenges that could result from removing all humans from ships. Autonomous ships that maneuver without the assistance of a local pilot, could be subject to potential in-efficient restrictions in order to maintain acceptable safety margins relative to other maritime activity in the affected waters.

On this background EMPA advices that local pilots are involved in the forthcoming preparation and implementation of autonomous shipping in Norwegian coastal waters.

EMPA remains at your disposal if additional information or dialogue is required on these subjects.

Sincerely,

Aileen Van Raemdonck
Secretary General of EMPA

¹ Ref: Amendment no 533 – European Parliament Ports Regulation legislative procedure
(<http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+COMPARL+PE-560.894+02+DOC+PDF+V0//EN&language=EN>)