

MARINE PILOTAGE DETERMINATION - SUMMARY OF KEY CHANGES

Background

Safe Transport Victoria is Victoria's maritime safety regulator. Under section 258(1)(i) of the Marine Safety Act 2010 (Vic), ST Vic is required to license pilots and develop appropriate standards for the training of pilots and pilot-exempt masters.

The previous determination, [Determination: Licensing and Training Requirements for Marine Pilots in Victorian Ports](#) was established in 2020 and is reviewed every three years.

The consultation process

The consultation process specifically targeted industry partners who are directly impacted by the previous determination and new Determination. ST Vic engaged directly with:

- Ports Victoria
- Port of Portland
- Gippsland Ports
- Pilot Examiners
- Australasian Marine Pilots Institute (AMPI)
- Australian Maritime Safety Authority (AMSA)
- Australian Maritime Officers Union (AMOU)
- Port Phillip Sea Pilots
- Auriga Pilotage Group
- Poseidon Sea Pilots.

Consultation included:

- Written material: detailed written feedback was received from all three Pilotage Services Providers. This allowed stakeholders to submit their thoughts, concerns and suggestions in a structured format.
- In-person meetings: held with each consultation participant. This allowed for any ambiguity in the feedback to be clarified instantly and allowed participants to ask questions and seek elaboration on points raised. These were two-way conversations to share perspectives and allowed for the conversation to remain productive and focused.
- Industry meeting: a collective meeting held with representatives from Ports Victoria, Port of Portland, Gippsland Ports, AMOU, Port Phillip Sea Pilots, Auriga Pilotage Group, and Poseidon Sea Pilots. This facilitated agreement on proposed changes that could be implemented and discussion on proposed changes that needed further review.

ST Vic received more than 300 written submissions, with additional feedback provided during in-person meetings. This participation highlighted the Pilotage Services Providers' (PSP) and Ports' willingness to engage and provide feedback on the review of the Determination, with a range of perspectives and suggestions for improvements to help inform the final Determination.

The consultation process has been instrumental in capturing valuable insights from participants, shaping the final Determination to reflect key recommendations where feasible. While some suggestions have been adopted, others will require further assessment and consideration by a Technical Advisory Group (TAG) or reassessment in the next review cycle.

ST Vic sincerely thanks all contributors for their thoughtful suggestions and constructive feedback, which have been invaluable in this process.

Key changes

The updated Determination will be published with the following key changes to provide clarity to the industry and/or reflect consensus within the industry.

The key changes to the Determination include:

General

PSPs are responsible for submitting applications to ST Vic.

Glossary

- The glossary has been reviewed and updated to enhance clarity and consistency. Several existing definitions have been refined for improved precision, and new definitions have been added to support clearer understanding of key terms. The assessment trip has been redefined as a check trip. The definitions added; Absence from piloting, Adverse Findings, Australian Citizen, Australian Pilotage Port, Full trip, Hours of Darkness, Permanent Resident, Pilot Licence conditions and endorsements, Ports Victoria, Safe Transport Victoria, Simulator Training, Simulator Training Plan, Tug and Tow, Unrestricted Pilot Licence, and Vessel.

Section 4

- Clarified the responsibility of a pilot.
- Pilots must obtain a certificate of medical fitness, including eyesight, at intervals not exceeding two years.

Section 5

- Additional information around eligibility of the issue of a Pilot Licence.
- Removal of the need to refresh the Electronic Chart Display & Information System (ECDIS) equipment course after a five-year period.
- Recognition of pilot from another Australian or International jurisdiction.
- Added the ability to issue a Class Licence above the minimum for a port in acknowledgement of highly experienced applicants.

Section 7

- A Trainee Pilot must now complete all required training for each port applied for within six months (previously three months), with an optional one-month extension.

Section 8

- Detailed Check trip requirements outlined.

Section 10

- Absence from piloting is now defined as a period of four months or more where a pilot has not performed an act of pilotage in a Victorian port where a licence is held.
- A pilot's licence is considered revalidated upon the successful completed of the required check trips when returning from an absence of less than 12 months.
- ST Vic must be informed if a Pilot no longer intends to act as a pilot.

Section 11

- An observing pilot is not permitted on the Vessel while a Trainee Pilot is under the close supervision and instruction of the licensed pilot. Removes the ability of a PSP to have multiple Trainee Pilots training on the same trip.
- Introduction of tug familiarisation trips. This will ensure pilots are familiar with all towage in a port for varying LOA, Breadths and Draughts of vessels. Has the advantage of ensuring tug masters are familiar with all pilots.
- Removal of Observer Trips. This is the responsibility of PSPs and serves no purpose for the issuing of a Trainee Pilot Licence.
- Updated details for the PLAKE and Shore Based Training.
- Recommendation that CPD training be, as a minimum, in line with Australasian Marine Pilots Institute (AMPI) or similar industry standards, ensuring a consistent approach across the industry.
- The Advanced Marine Pilot Training course must be completed within two years of a pilot obtaining a pilot licence with a class condition; or must have been completed within the five-year period preceding the date of obtaining a pilot licence with a class condition.

Section 12

- Other persons are able to attend the examination to provide support to the Trainee Pilot.

Section 13

- A Pilot seeking to add a Port of Melbourne precinct condition to their licence is now required to complete a combination of mentoring trips and check trips.
- There is no longer a requirement that a precinct check trip starts or finishes at the pilot boarding ground.
- There are fewer Port of Melbourne precincts.

Section 14

- Training Trip requirements to precincts added for Trainee Pilots to be consistent.
- A pilot that does not complete all precinct training trips as a Trainee Pilot, may request ST Vic to review the number of precinct check trips required to a particular precinct.
- A Pilot seeking to add a Port of Geelong precinct condition to their licence is now required to complete a combination of mentoring trips and check trips. Including trips during the hours of darkness to be consistent.
- Updated Port of Geelong precincts.

Section 17

- Updated progression table formatting to increase readability.

Technical Advisory Group

ST Vic were not able to reach a final position regarding the annexures (sections 13-19) within the Determination.

ST Vic will establish a TAG to resolve outstanding items identified during consultation in sections 13-19. The TAG will be tasked with working through unresolved matters, which may include identifying what evidence/activities are required to guide potential changes.

Key themes from consultation to be addressed by the TAG include:

- Respondents recommended the sea service requirements be for a vessel of no less than 3000 gross tonnes.
- Respondents indicated that the eligibility criteria for the issue of a class above the initial class for a Victorian port is too restrictive.
- Respondents recommended that licensed pilots should be able to add precincts with mentor trips, rather than check trips.
- Respondents recommended an evidence-based approach to the check trip requirements for a return from absence of less than 12 months.
- Respondents recommended an evidence-based approach to annual check trip requirements.
- Respondents recommended that the Port of Geelong and the Port of Melbourne should have separate licences.
- Respondents recommended that Port of Melbourne precincts should be aligned with swing basins.
- Respondents recommended updates to the training tables and progression tables.
- Respondents recommended a review of the Class 10 (oversize) endorsement eligibility criteria, as it is unworkable for many pilots.
- A potential requirement for a high-risk endorsement.

Next review cycle

Key themes deferred to the next review cycle:

- Respondents recommended a competency-based framework to set the minimum standard for how PSPs can train a pilot to become competent. The competency-based approach would be consistent with international standards and would allow Victoria to align with other jurisdictions within Australia.

ST Vic acknowledges the merits of this recommendation and intends to consider this during the next review. Implementation of a competency-based framework would increase alternative pathways into marine pilotage. However, extensive time and consultation will be required to explore this model.

- Respondents recommended adopting the New South Wales medical standards and creating a code of practice outlining minimum medical fitness standards, noting that some organisation's apply higher thresholds than Marine Order 76, leveraging AMSA's medical fitness standards.

ST Vic acknowledges the merits of this recommendation. Adopting the New South Wales medical standards would improve the safety of pilotage services; and it would increase alignment of regulation on the eastern seaboard. However, this recommendation will not be implemented in this review, due to the time required to consult with national regulators and the healthcare industry.