## IMPA comments on Danpilot's Remote Pilotage Initiative

The following has been received from IMPA in a correspondence with the IALA Secretary-General:

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… implied tasks from the DanPilot letter include training programs for pilots and audit programs for bridge teams. Pilot training, including remote pilots, would already fall within the scope of IMO resolution A.960(23), and IMPA is best placed to guide pilot organisations and competent pilotage authorities in this area. For audits of bridge teams, this is a controversial area from a shipowner/operator perspective, and we are not convinced that the safe manning, legal and liability implications have been fully considered.

IALA has recommendations and guidance that can already be applied in the context of DanPilot’s remote pilotage trials, including those relating to risk assessment and VTS operators. However, we strongly recommend avoiding specific work on matters related to pilotage as this would compromise our cooperative agreement. So, we recommend the following.

We have set the goal of ensuring that pilotage delivers a risk reduction of x528 (TEMS, 2022) and maintains an incident rate of less than 1 very serious maritime casualty for every 10 million acts of pilotage (UNCTAD, IMO, IMPA). Informed by, but not determined by, the technology solutions we have evaluated, we are defining technology-agnostic functional requirements for remote pilotage. This includes functional requirements for ship-shore connectivity and communication, which are necessary to enable such a service to conform to the goal.

To the extent possible, we are linking any specific requirements to existing information providers, communications links, protocols, and data models. Once validated, we expect the functional requirements to benefit from IMPA and IALA developing consequential technical recommendations and guidelines within their respective areas of expertise. These can be used by competent authorities to evaluate specific technologies for implementing remote pilotage. Importantly, we believe this approach would benefit IALA member States because it avoids premature standardisation based on proprietary solutions for specific situations and instead focuses efforts on establishing a framework for innovation driven by goal-based requirements for safe, effective, and efficient pilotage, which meets the needs of individual coastal States.

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