



		<p>Jon Stafford PLA Pilot</p> <p>Gordon Price PLA Pilot / DPC</p> <p>Don Cockerill PLA Pilot</p> <p>C Young PLA Pilot</p>	<p>There can by definition be only ONE Master aboard a vessel it is not a position that can be swapped from person to person aboard a ship to suit the PEC arrangements onboard. Clearly this definition has been slipped in to legalise Cobelfrets system of private pilotage with the PEC's they have.</p> <p>3.(1)n) This must be the worst description I have seen for a Master of a vessel. It would appear to allow <i>anyone</i> to describe him/herself as Master, including someone ashore who could claim that he/she "managing the vessel". Isn't there a description contained in the MS act 1995</p> <p>This is to state that the definition of master in the new directions is inappropriate as it opens the whole system to abuse. My wording would be "the master is the person who is in command and charge of the vessel".</p> <p>Definitions: Master. Presumably this wording has been adopted to fall in line with the presented wording of the still to be debated Ports Marine Navigation Bill. It should however be noted that the definition as presented creates a potentially very dangerous situation. Taken in conjunction with Regulation 1.3.a on page 14 (Regulations for the issue of a PEC), it allows a vessel operator to declare any person he so wishes to be "bona fide" for the purposes of these directions and the associated PEC regulations. It could thus very easily be utilised in a defence of the already common loophole practise of private pilotage services currently operational aboard a number of regularly operating vessels within the port. The undesirable consequences of such practices are already documented in the URSINE/PRIDE OF BRUGE incident MAIB report. All the proposed changes to the definition should be removed. <b>This amendment was proposed in order to align the various definitions of Master used in PLA regulations. However, it is recognised that the definition of Master in the Pilotage Directions requires a specific form of words. This proposed change has been withdrawn and the current definition will remain without change.</b></p> <p>A definition of "Assistant Pilot" should be provided in Direction 3. <b>After due consideration, we feel there is no reason or need to define 'Assistant Pilot'. . It is already effectively defined in PD 7.</b></p> <p>3 (1)n – Suggest add the text 'and who is not employed as Second Captain by the owner or charterer solely for the purpose of taking conduct of the vessel in the London Pilotage District, using his own PEC'. This would define who onboard is the Bona Fida Master and so the responsible person in the event that a prosecution becomes necessary <b>This amendment was proposed in order to align the various definitions of Master used in PLA regulations. However, it is recognised that the definition of Master in the Pilotage Directions requires a specific form of words. This proposed change has been withdrawn and the current definition will remain without change.</b></p>
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2.	<b>PD4</b> VESSELS SUBJECT TO COMPULSORY PILOTAGE	Barry Goldman VTS Manager	<p>4(1d) + (2d) By coincidence, I was reviewing para 4.(1)d and 4.(2)d today to extract some guidance notes and found that these two subparagraphs are, at best, ambiguous and, at worst, almost impossible to regulate if taken literally. I have discussed a revised proposal with HML and offer the alternative text below:</p> <p><i>4(1d) Vessels or Tugs and Tows of 50 metres and up to 90 metres in Length Overall with an Operating Draught of 4 metres or more when Restricted Visibility exists within that part of the London Pilotage District to the east of Sea Reach 1 Buoy where the vessel is planning to navigate.</i></p> <p><i>4(2d)Vessels or Tugs and Tows of 50 metres in length or more overall with an Operating Draught of 4 metres or more when Restricted Visibility exists within that part of the London Pilotage District to the West of Sea Reach No. 1 Buoy where the vessel is planning to navigate.</i></p> <p><b>Agreed – the alternative text is clearer and has replaced the relevant sections.</b></p>
3.	<b>PD5</b> VESSELS EXCEPTED FROM COMPULSORY PILOTAGE	Jon Stafford PLA Pilot	<p>5(3) How can there be any competent risk assessment when a ship is allowed to be exempt without any reference to its operators competence and knowledge. How can we assess that a ship is competent?</p> <p><b>The district Harbour Master will make the judgment based on risk assessment; hence the additional words ‘subject to the requirements of the Harbour Master’.</b></p>
4.	<b>PD8</b> BOARDING AND LANDING OF PILOTS	Christopher Clarke PLA Pilot   Hywel Pugh PLA Pilot  Don Cockerill PLA Pilot	<p>8 b (iii) The Princes Channel has been dredged to 7.8m CD which now allows larger and deeper ships to enter and leave the port , to and from the South. That is good for shipping and the port alike. However, I find that I need to question the wisdom of forcing ships, with a draught &lt;7.5m, in and out of the Princes Channel via the NE Spit Pilot station when they can more safely and more economically, for them, use the Sunk Pilot station, when entering and leaving the port from and to the North.</p> <p><b>Comment noted. The Princes Channel improvements have benefitted many port users without compromising safety.</b></p> <p>Page 8 - 8. Boarding &amp; Landing. (1) a) i) The Long Sand Route should be included.  <b>Agreed – Reference to the Long Sand Head has been included.</b></p> <p>8. Boarding &amp; Landing. (1) a) i) add after Fishermans Gat "and Long Sand Head route if appropriate" and...  <b>Agreed – Reference to the Long Sand Head has been included.</b></p>

		Jon Stafford PLA Pilot	8 (2) consider re-wording to read "Pilots may only be landed .... <b>Agreed – Amended accordingly.</b>
		R Tappenden PLA Pilot	8 This does not appear to allow for any discretion by the Authority to allow vessels outside of the stated criteria to use the "wrong" channels. There is currently a problem with training where it would be in our interest to allow for this movement for training purposes. <b>In practice, different channels are now used for pilot training. An Operational letter refers.</b>
			8.1(2) Add " Vessels will be required to be underway and in the vicinity of the boarding position for this purpose" <b>There is no legal proviso for such a Direction. The PLA's Code of Practice for the Embarkation and Disembarkation of Pilots covers such operations.</b>
5.	<b>REGULATION 1 PILOTAGE EXEMPTION CERTIFICATES</b>	Richard Flynn Pilotage Resources Manager	Regulation 1.3 regulations for the issue of a PEC, should part k include reference to vessels over 160m LOA. This size of vessel, for simulator training, is included in part O. To include in para K would just tidy things up. <b>Agreed – Amended accordingly</b>
		Andy Batchelor Thames Barrier	We totally support amended clause 1.3 k) Where applicants for Pilots Exemption Certificates (PECs) employed on vessels over a certain size and carrying certain cargoes which transit the Thames Barrier must undertake simulator training on the PLA simulator in addition to the normal requirements for a vessel of that size. We also believe this would be beneficial if it was extended to Barking Barrier also as we have had a few impacts there as well. <b>Comments noted. Having considered the current utility of the PLA simulator in some depth, we are of the view that there would be little actual benefit (against cost) of extending the scope to include Barking Creek Barrier. However, Regulation 1.1 will be amended to specifically include Barking Creek in Area 4, thus allowing specific assessment of PEC candidates' knowledge and skills of this area at examination.</b>
		Roy Stanbrook Harbour Master (Lower)	Regulation 1.3 - Can we stipulate a requirement for applicants to complete a minimum number of trips with a pilot rather than another PEC holder? <b>Agreed – New sub-paragraph in Regulation 1.3 requiring a minimum of 50% of qualifying trips to be undertaken understudying an authorised pilot.</b>
			<b>This proposal will be subject to further public consultation.</b>













		<p>Donald Chard London Ship Owners' and River Users' Society</p>	<p>Our main objection centres on the accompanying Regulations where there is deep concern that the confirmed order period for an outward pilot has been increased from four to six hours and notification of changes from two to three hours. This significant change will impose a considerable additional administrative and logistical burden on port users, yet it has been put forward without any reasoned argumentation or justification. Tight scheduling is an everyday feature in the organisation of cargo handling arrangements. Terminals are reliant on constant throughput to maintain manufacturing and processing capabilities and any delay due to a vessel being unable to move onto or leave a berth because of the non-availability of a pilot can have significant economic consequences in terms of lost production, demurrage and other third party claims.</p> <p>The position can be further complicated by the nature and handling properties of individual cargoes so that even the most experienced operators often find it difficult to predict an accurate completion time to fulfil the present four hours' commitment for a confirmed outward order. The proposed extension to six hours adds a further element of uncertainty as it will be more difficult to anticipate events over that longer period, possibly leading to an upsurge in changes to ETDs. This will, no doubt, have implications for pilot rostering.</p> <p>Accordingly, the Society urges PLA to reconsider this proposal and maintain the current, albeit less than satisfactory, four hours' notice period for a confirmed outward pilot.</p> <p><b>The main reason for wanting the 6 hour notice for departure is the fact that at present we are unable to utilise 16% of our current authorised pilots to conduct departure acts of pilotage at or above Gravesend with the present notice of 4 hours. Extending the required notice to 6 hours will allow us the flexibility to be able to utilise all of the on-watch pilots, no matter where they are based; thus improving the overall service and pilot availability.</b></p> <p><b>However, after due consideration, we agree that the current requirement of 4 hours notice for sailing can be retained for those ships departing from berths where pilotage is only required to Gravesend or Sea Reach 1; as these vessels will normally take a River Pilot, based at Gravesend. Notice for ships to the Sunk and NE Spit will remain at the proposed 6 hours.</b></p> <p><b>In addition, and following further discussions with ships agents, the confirmed order notice requirement for inward-bound vessels from the NE Spit and adjacent anchorages has been reduced from 8 to 6 hours. These changes will be reflected in the forthcoming second public consultation.</b></p>
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7.	<b>REGULATION 3 BOARDING AND LANDING INFORMATION FOR VESSELS BOUND TO OR FROM THE PORT OF LONDON</b>	<p>Don Cockerill PLA Pilot</p>	<p>Refuse to use a ladder Page 23 - 3.1 (third bullet point) after regulations add "Note that a PLA pilot may refuse to use any ladder, which does not comply with the regulations." <b>Agreed – Text amended accordingly</b></p>

