



AUSTRALASIAN  
MARINE PILOTS INSTITUTE

PO Box 860  
Newcastle, NSW 2300  
Australia  
Telephone: 61 458 014 660  
Email: admin@ampi.org.au  
www.ampi.org.au

ACN: 139 920 335

Maritime Safety Queensland  
MacArthur Avenue East  
Pinkenba  
Queensland 4008

10 December 2021

### Port of Brisbane – Simulation in lieu of on-water training

Dear Mr Mahon,

I am writing to reiterate the strong concerns of AMPI (as a member of IMPA) and the wider pilotage fraternity regarding the deepening crisis in Brisbane.

I have attended the Marine Safety Queensland stakeholder engagement meetings, alongside the AMPI executive and many of our members. AMPI is not satisfied that our concerns have been addressed in a meaningful way, and in many cases, we found the answers to our questions to be evasive and lacking in substance.

I would also like to refute the statement from Jim Huggett that MSQ and AMPI were in “lockstep” over the issue (industry engagement 6<sup>th</sup> December 2021), this is incorrect.

You have informed us that Poseidon Sea Pilots are training marine pilots for a pilotage license without on-water training and are being licensed by MSQ based on their previous experience in other ports, augmented by simulation. We do not consider this approach to have parity with the existing training program for the Port of Brisbane, or any other major port in Queensland.

These training arrangements do not comply with IMO Res A960, Annex 1 (copy attached for reference), specifically paragraph 5 which deals with training and certification or licensing standards.

These training arrangements fall short of any other port in Australia and likely any other major port in the western world.

Marine Safety Queensland appear to be of the understanding that simulation can effectively replace on-water training, AMPI asserts that this is not the case. The International Maritime Organisation and International Marine Pilots Association share our position regarding the use of simulation. IMO A960 (M) (2004 Version) Section 5.2 states that the practical experience gained by the trainee pilot “may be supplemented by simulation, both computer and manned model ...” and two IMPA Resolutions on the use of shiphandling simulators resolved that “... the use of simulators to evaluate or predict a pilot’s performance in the real world for licensing purposes to be an inappropriate use of an otherwise valuable technology” as well as resolving that “... the sole use of simulators for training and certification to be inadequate in validating the appropriate levels of competence required for navigating in pilotage waters ...”

The argument that the Smartship simulator is “high fidelity” is an immeasurable and meaningless statement. Marine simulators, including Smartship, lack the level of rigor and qualified oversight in terms of the integrity of the systems, models, data and even the qualifications of those running them, in contrast to the requirements that are the mainstay of aviation simulators.

Jim Huggett stated that pilotage has two elements - local knowledge and ship handling skill, this is a concerning oversimplification from a regulator. The skills a pilot develops on the water are significantly more substantial than these two elements and cannot be taught in the artificial environment of a simulator, during daylight hours, with native English-speaking staff and in the absence of a long, rough pilot boat transit/embarkation preceding it. Pilotage is a complex form of risk management involving numerous conflicting elements and the skills involved require exposure and experience onboard ships.

The trainee Marine Pilots employed by Poseidon Sea Pilots are being checked and assessed by persons who do not hold current licenses in the Port of Brisbane and are conducting these assessments in a simulated environment, which is a significant deviation from established world's best practice.

AMPI understands that the newly licensed pilots are being licensed under emergency powers, if correct the only emergency here is as a direct result of an incorrectly managed tender and transition process. The apparent deviations from established standards to facilitate the needs of a successful tenderer raises serious questions about the integrity of the process.

Australia has a world leading reputation in marine pilotage, however where there are concerns that these standards are being diminished AMPI must act in the best interests of maintaining the professional integrity of pilotage standards in Australia and the reputation of our members. The developing situation in Brisbane does not comply with essential marine pilot training practices in Australia or internationally.

Please note that we will also be raising awareness of our concerns to relevant stakeholders and industry representatives.

Yours faithfully,

A handwritten signature in black ink that reads "Peter Dann". The signature is written in a cursive, flowing style.

Captain Peter Dann  
President AMPI