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To Whom It May Concern

The European Maritime Pilots' Association (EMPA) aims to promote efficient and safe pilotage in European ports and fairways. Effective pilotage regulations are key to ensure the safety and efficient functioning of ports. A robust pilotage service operating without competitive market pressures will ensure navigational safety and protect the marine environment.

It is of the utmost importance for pilots to be able to exercise their professional, independent judgment during high-risk operations with full autonomy and integrity. In Europe, maritime pilotage is recognised as an indispensable public service, shielded from competition as per the Port Services Regulation (EU) 2017/352. This Regulation allows for competitive practices in various port services but purposefully excludes pilotage to uphold safety and navigational standards in maritime pilotage operations. The reasoning behind this legislation supported by several Members of the European Parliament (MEPs) stated: "Pilotage provides an essential and unique service to the shipping industry, which if open to competition would jeopardise maritime safety and security, the protection of the environment and the efficiency of ports."

Maritime pilotage is a critical service for the security of any nation, serving as the backbone of national supply chains. With 80% of global trade transported by sea, the world depends on the maritime industry, and pilots play a vital role in ensuring that supply chains remain open and efficient. Establishing safe and effective pilotage service regulations is essential for the prosperity of national businesses and the security of supply chains. Well-regulated pilotage services guarantee consistent, safe, and efficient navigation in national ports, harbours and fairways, facilitating domestic and international shipping operations crucial for national and global economic growth.

Pilots are skilled experts in ship handling and navigation in narrow, congested waters. The foundation for any reform of pilotage laws should include standardised minimum entry requirements and adherence to the training standards specified in the International Maritime Organization (IMO) Resolution A.960(23).

Moreover, regulations regarding pilotage must be distinct from other seafarer legislation, which meets international obligations, while pilotage legislation needs to be custom-fit to specific port requirements.

There are various pilotage systems across Europe, and we remain open to discussions to share insights on how different countries legislate and manage their pilotage services effectively.

Sincerely,
Captain Erik Dalege
President
EMPA – European Maritime Pilots' Association