

PILOTAGE ADVISORY COMMITTEE

Proposed Amendments to the Pilotage Order, Cap. 84C (Schedule 3 – Experience Required for Amendment of Licence to Higher Class of Pilotage)

Purpose

The purpose of this paper is to seek members' advice and endorsement on the proposed amendments to the "Experience Required for Amendment of Licence to Higher Class of Pilotage," as stipulated in Schedule 3 ("the Schedule") to the Pilotage Order, (Cap. 84C) ("the Order")¹.

Background

2. The Order, a subsidiary legislation of the Pilotage Ordinance (Cap. 84) stipulates the qualification and experience requirement of an applicant for various classes of pilotage. Schedule 3 specifies the experience required for amending a licence to a higher class of pilotage. The Order was amended in 2016 and 2022².

3. The experience required for amending the licence for each higher class of pilotage under the Order could be summarized as follows:

- a) A minimum of 12 months continuous experience in the current class;
- b) pilotage of ships for the current class to or from buoys or anchorages on at least 10 occasions, of which at least 5 must commence during the hours between sunset and sunrise; and

¹ There are three Schedules to this Order, Schedule 1 specifies the appropriate experience of applicant, Schedule 2 specifies the classes of pilotage and Schedule 3 specifies the experience required for amendment of licence to a higher class of pilotage.

² Last major amendment was made in 2016 where the list of appropriate experience stipulated in Schedule 1 was updated, i.e., the Class II pilotage changed from 4 levels to 6 levels in Schedule 2 with associated experience requirement in Schedule 3. A minor amendment was made in 2022 where the description of pilotage service in Schedule 2 was updated, i.e. the change in using a general wording "Pilotage of Ships" to include all types of pilotage services, such as pilotage of ships in transit or specific length.

- c) Berthing or unberthing of ships for the current class to or from wharves, berths, docks or piers on at least 20 occasions, of which at least 10 must commence during the hours between sunset and sunrise.

The Problems

4. Shipping activities underwent significant changes during and after the COVID-19 pandemic in 2019. According to recent information provided from shipping companies, the numbers of ships calling at Hong Kong will gradually decrease starting in the third quarter of 2025, following the reform of shipping alliances. Hong Kong Pilots Association Ltd. (“HKPA”) has, in recent years, received feedback from pilots holding Class IIB and Class IIA licences that they encountered difficulties and challenges in attaining the experience required in part (b) in 12 months for amending their licences to a higher class.

5. In fact, there has been a significant decrease in the number of ships using anchorages or mooring buoys in Hong Kong in the past decade from 2015 to 2024 (refer to Table 2 of Annex I), making it difficult and challenging for certain classes of pilots to meet the requirements for amending their licences to a higher class. Using the data presented in Annex I, Figure 1 below illustrates the recent years from 2020 to 2024 regarding ships utilising anchorages or mooring buoys in Hong Kong. It indicates that ships of lengths requiring licence amendments for Class IIB (>250 m and ≤ 300 m) and Class IIA (>300 m and ≤ 350 m) constitute some of the least frequent pilot orders.



Figure 1 Anchoring and Mooring Orders 2020-2024

6. According to the Table 2 of Annex I, the total number of pilotage orders related to anchorages or buoys has significantly decreased, from 6,479 in 2020 to only 3,719 in 2024. The situation is even more concerning for Class IIB and Class IIA pilots, as the number of orders has dropped from 607 and 48 in 2020 to 246 and 15 in 2024 respectively (fig.1b).

7. As mentioned in paragraph 4, the shipping activities in Hong Kong underwent the changes following the COVID-19 pandemic, most of the vessels could berth at the terminals directly the ship of lengths longer than 250m, making the downward trend more significant after 2019. Projections for pilotage orders utilising anchorages or buoys (refer to Table 4 of Annex I) suggest that a decline in ships of lengths ($>250\text{m}$ and $\leq 300\text{m}$) and ($>300\text{m}$ and $\leq 350\text{m}$) utilising anchorages or buoys, with substantial yearly decrease in the past 5 years (2019-2024) for Class IIB and Class IIA. Additionally, the anticipated number of pilots to be upgraded to the next higher class (refer to Annex II) will create ongoing challenges for Class IIA and Class IIB pilots in meeting the experience requirements stipulated in Schedule 3 of the Order.

8. Following the downward trend over the past five years, which reflects a broader shift in industry practices, the projected number of pilotage orders for ships of lengths ($>250\text{m}$ and $<300\text{m}$) utilising anchorages or buoys is expected to decline to double digits, reaching 77 in 2030 and 30 in 2035 (refer to Table 5 of Annex I). Even more concerning is the projection for ships of lengths ($>300\text{m}$ and $\leq 350\text{m}$), where the number of pilotage orders in 2030 is forecasted to be just 4 (refer to Table 5 of Annex I), while the anticipated number of Class IIA pilots to be upgraded is 6 in the same year.

Considerations

9. Marine pilots support shipmasters in ensuring safe navigation by providing local expertise and assisting with communication and coordination. They also help shipmasters navigate and manoeuvre safely in challenging and congested waters.

10. In the pilotage career path, after obtaining the initial Class IIF pilotage licence, it takes a minimum of four years of continuous experience to progress to Class IIB. During this time, an applicant seeking to upgrade to a Class IIB licence would have piloted over a thousand ships to and from various destinations within the port of Hong Kong. This includes piloting the ships to and from terminals,

buoys, anchorages, and transiting through Hong Kong waters (refer to Annex III). They would have developed significant localized expertise and refined their conning skills and techniques to effectively handle the full range of pilotage tasks.

11. The number of Class II pilots requiring amendments to their licences has been reviewed. Meeting the experience requirements stipulated in Schedule 3 for amending licences up to Class IIB would not be an issue over the next ten years, as there are expected to have enough suitable orders (refer to Table 5 of Annex I; and Annex II) that will enable pilots from Class IIF through Class IIC to build up a solid foundation for various types of pilotage operation. For instance, eight pilots are expected to be promoted from Class IIC to Class IIB in 2030, and they may require 80 pilot orders utilising anchorages or buoys to gain experience, while the projected total number of pilot orders related to anchorages or buoys is about 220.

12. With four years of accumulated local knowledge, expertise, and practice – from Class IIF to Class IIC – pilots would have developed a solid foundation, enabling them to apply their skills effectively in various circumstances. Although the number of larger ships anchoring is limited, the opportunities for skill refinement through other piloting tasks remain comparable to those offered by anchoring. This allows pilots to concentrate on the intricacies of handling and controlling ships of different sizes, particularly larger ones. The experience required for advancing their licences to higher classes, such as Class IIB and beyond, could emphasize the management of mega-sized ships through major passages, such as transits of Ma Wan Channel or operation to and from container terminals or wharves.

13. Should the requirements stipulated in the Schedule remain unchanged, it could result in a reduced pool of qualified Class IIA and Class I pilots, and hindering their career development. It is apparent that the requirement specified in the Schedule needs to be amended so as to allow Class IIB and Class IIA pilots to attain their legally required experience and progress in their career in a reasonable pace while maintaining both safety and expertise standards.

14. HKPA suggested a combination of experience requirements for the higher classes of Pilotage be adopted while maintaining the total number of occasions unchanged, it would effectively enable Class IIA and Class IIB pilots to gain the necessary experience and progress to a higher class at a more organized pace.

Proposed Amendments

15. In conclusion, HKPA recommends to combine the requirements specified in parts (b) and (c) mentioned in paragraph 3 in order to enhance the effectiveness of the experience of Class IIB and Class IIA and progress necessary for advancement of a pilot and for amending a licence to the next higher class (i.e. Class IIA and Class I). A summary presentation of proposed amendments is attached at Annex IV for members' reference.

16. It is proposed that:

i) For Class IIB amend to Class IIA:

Combining item 5 (b) and (c) in the Schedule 3 of the Order without altering the total number of occasions required.

Suggested writing of the combined requirement will be amended;

from:

- “(b) *Pilotage of ships exceeding 250 metres and not exceeding 300 metres in length to or from buoys or anchorages on at least 10 occasions, of which at least 5 must commence during the hours between sunset and sunrise.*
- (c) *Berthing or unberthing of ships exceeding 250 metres and not exceeding 300 metres in length to or from wharves, berths, docks or piers on at least 20 occasions, of which at least 10 must commence during the hours between sunset and sunrise.”*

to

- “(b) *Pilotage of ships exceeding 250 metres and not exceeding 300 metres in length to or from buoys, anchorages, berthing or unberthing to or from wharves, berths, docks or piers on at least 30 occasions, of which at least 15 must commence during the hours between sunset and sunrise.”*

ii) For Class IIA to Class I:

Combining item 6 (b) and (c) in the Schedule of the Order without altering the total number of occasions required.

Suggested writing of the combined requirement will be amended;

from:

- “(b) Pilotage of ships exceeding 300 metres and not exceeding 350 metres in length to or from buoys or anchorages on at least 10 occasions, of which at least 5 must commence during the hours between sunset and sunrise.*
- (c) Berthing or unberthing of ships exceeding 300 metres and not exceeding 350 metres in length to or from wharves, berths, docks or piers on at least 20 occasions, of which at least 10 must commence during the hours between sunset and sunrise.”*

to

- “(b) Pilotage of ships exceeding 300 metres and not exceeding 350 metres in length to or from buoys, anchorages, berthing or unberthing to or from wharves, berths, docks or piers on at least 30 occasions, of which at least 15 must commence during the hours between sunset and sunrise.”*

Consultation

17. These proposals were discussed in the PAC Working Group held on 5 September 2025, members of the working group supported the proposals unanimously.

Presentation

18. HKPA will present this paper.

Advice Sought

19. Members’ advices and endorsement are sought on the proposed amendment mentioned in Paragraphs 15 and 16 above.

Hong Kong Pilots Association
September 2025

Table 1 **No. of Pilot Orders (From 2015 to 2024)**

Class	Ship's LOA	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
	<107	2050	1837	1743	1427	1289	1534	1066	1025	1027	856
IIF	>107m to 160m	13081	11838	9934	9783	8518	7973	8448	7846	6165	5611
IIE	> 160m to 180m	9578	9521	9611	9694	9825	9224	9143	9290	9526	8544
IID	> 180m to 210m	6831	6533	6253	5957	5880	6015	6114	5922	6600	7317
IIC	>210m to 250m	4414	4584	4683	4790	4610	4911	3960	3390	2960	2576
IIB	>250m to 300m	10702	9998	9429	9314	9241	10130	8648	7139	6621	5923
IIA	>300m to 350m	4721	4683	4542	3774	3087	4135	3554	2732	2623	2576
	>350	1755	1948	2617	2806	2414	4655	4071	2628	2026	1806
Total		53132	50942	48812	47545	44864	48577	45004	39972	37548	35209

Table 2 **No. of Pilot Orders (To/From Anchorages/Buoys)**

Class	Ship's LOA	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
	<107	775	662	700	453	332	318	280	254	318	204
IIF	>107m to 160m	6315	5277	4279	3694	2796	1930	1908	1735	1271	1034
IIE	> 160m to 180m	3302	3025	3165	3012	2593	1475	1327	1056	1118	954
IID	> 180m to 210m	1399	1225	1094	1102	1242	1121	940	710	909	810
IIC	>210m to 250m	712	665	733	790	953	980	523	465	494	453
IIB	>250m to 300m	889	725	520	685	674	607	457	301	256	246
IIA	>300m to 350m	40	85	94	113	54	48	47	28	15	15
	>350	0	0	0	1	2	0	0	1	0	3
Total		13432	11664	10585	9850	8646	6479	5482	4550	4381	3719

Table 3 **No. of Pilot Orders (Berthing/Unberthing)**

Class	Ship's LOA	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
	<107	832	729	750	748	691	885	545	632	660	553
IIF	>107m to 160m	5439	5065	4451	4708	4357	4178	4362	4029	2992	2863
IIE	> 160m to 180m	5150	5128	5306	5371	6017	5910	5547	5749	5895	4689
IID	> 180m to 210m	4213	4279	4075	4038	3972	3739	3441	3226	3682	3990
IIC	>210m to 250m	2630	3052	3119	3077	2662	2493	1928	1598	1670	1350
IIB	>250m to 300m	6320	5980	5504	5056	5171	4737	3530	3049	3357	2722
IIA	>300m to 350m	3017	3025	2952	2397	2064	1638	1478	1299	1404	1272
	>350	1011	1050	1538	1838	1600	1519	1233	1000	1303	1088
Total		28612	28308	27695	27233	26534	25099	22064	20582	20963	18527

Table 4 **Yearly Rate of Change on No. of Pilot Orders (To/From Anchorages/Buoys)**

Class	Ship's LOA	2015-2016	2016-2017	2017-2018	2018-2019	2019-2020	2020-2021	2021-2022	2022-2023	2023-2024	Average Yearly Change (2019-2024)
	<107	-14.58%	5.74%	-35.29%	-26.71%	-4.22%	-11.95%	-9.29%	25.20%	-35.85%	-7.22%
IIF	>107m to 160m	-16.44%	-18.91%	-13.67%	-24.31%	-30.97%	-1.14%	-9.07%	-26.74%	-18.65%	-17.31%
IIE	> 160m to 180m	-8.39%	4.63%	-4.83%	-13.91%	-43.12%	-10.03%	-20.42%	5.87%	-14.67%	-16.47%
IID	> 180m to 210m	-12.44%	-10.69%	0.73%	12.70%	-9.74%	-16.15%	-24.47%	28.03%	-10.89%	-6.64%
IIC	>210m to 250m	-6.60%	10.23%	7.78%	20.63%	2.83%	-46.63%	-11.09%	6.24%	-8.30%	-11.39%
IIB	>250m to 300m	-18.45%	-28.28%	31.73%	-1.61%	-9.94%	-24.71%	-34.14%	-14.95%	-3.91%	-17.53%
IIA	>300m to 350m	112.50%	10.59%	20.21%	-52.21%	-11.11%	-2.08%	-40.43%	-46.43%	0.00%	-20.01%

Table 5 **Projection on No. of Pilot Orders (To/From Anchorages/Buoys)**

Projection on New Orders (10% from 1990-2000)							
Class	Ship's LOA	2025		2030		2035	
	<107	204 x (1-7.22%)	189	204 x (1-7.22%)^6	130	204 x (1-7.22%)^11	89
IIF	>107m to 160m	1034 x (1-17.31%)	855	1034 x (1-17.31%)^6	330	1034 x (1-17.31%)^11	128
IIE	> 160m to 180m	954 x (1-16.47%)	797	954 x (1-16.47%)^6	324	954 x (1-16.47%)^11	132
IID	> 180m to 210m	810 x (1-6.64%)	756	810 x (1-6.64%)^6	536	810 x (1-6.64%)^11	380
IIC	>210m to 250m	453 x (1-11.39%)	401	453 x (1-11.39%)^6	219	453 x (1-11.39%)^11	120
IIB	>250m to 300m	246 x (1-17.53%)	203	246 x (1-17.53%)^6	77	246 x (1-17.53%)^11	30
IIA	>300m to 350m	15 x (1-20.01%)	12	15 x (1-20.01%)^6	4	15 x (1-20.01%)^11	1

*Projection is based on Average Yearly Change (2019-2024) in Table 4

Anticipated number of pilots to be upgraded

	2025	2026	2027	2028	2029	2030
Class IIA to I	7	1	1	5	15	6
Class IIB to IIA	1	1	5	15	6	2
Class IIC to IIB	1	5	15	6	2	8
Class IID to IIC	5	15	6	2	8	5
Class IIE to IID	15	6	2	8	5	2
Class IIF to IIE	6	2 ⁽²⁾	8 ⁽⁴⁾	5	2	4
Apprentice	10 ⁽¹⁾	13 ⁽³⁾	7 ⁽⁵⁾	6	6	7

Remarks

- (1) No. of apprentice pilots of 2025 = existing (5 nos.) + successor of the pilots to be retired in the upcoming year [2026] (5 nos.).
- (2) 2 out of the 10 apprentice pilots in 2025 are anticipated to become Class IIF pilots in 2026, and 8 apprentice pilots will be rollover to 2026.
- (3) No. of apprentice pilots of 2026 = 8 nos. (rollover from 2025) + 5 nos. (successors of the pilots to be retired in the upcoming year/Human Resource Management [2027]).
- (4) 8 out of the 13 apprentice pilots are anticipated able to become Class IIF pilots in 2026, and 5 apprentice pilots will be rollover to 2027. And so on for 2028, 2029 and 2030.
- (5) No. of apprentice pilots of 2027 = rollover from 2026 (5 nos.) + successor of the pilots to be retired in the upcoming year (2 nos.). And so on for 2028, 2029 and 2030.

Projection on Number of Pilot Orders (To/From Anchorages/Buoys)

Class	Ship's LOA	2025	2030	2035
Apprentice	<107	189	130	89
IIF	>107m to 160m	855	330	128
IIE	> 160m to 180m	797	324	132
IID	> 180m to 210m	756	536	380
IIC	>210m to 250m	401	219	120
IIB	>250m to 300m	203	77	30
IIA	>300m to 350m	12	4	1

Number of Pilotage Orders Conducted**By 7 Class IIA pilots in 2024**

Pilot	Order	IIF	IIE	IID	IIC	Total	Yearly Average
A	Total	516	530	514	517	2077	519
	<i>Berthing/UnBerthing</i>	138	190	149	223	700	175
	<i>To/from Anchorage/Mooring buoy</i>	93	88	74	69	324	81
B	Total	696	562	566	531	2355	589
	<i>Berthing/UnBerthing</i>	168	228	169	225	790	198
	<i>To/from Anchorage/Mooring buoy</i>	141	81	77	64	363	91
C	Total	577	579	463	470	2089	522
	<i>Berthing/UnBerthing</i>	139	212	138	162	651	163
	<i>To/from Anchorage/Mooring buoy</i>	91	78	51	56	276	69
D	Total	559	525	566	533	2183	546
	<i>Berthing/UnBerthing</i>	138	183	161	234	716	179
	<i>To/from Anchorage/Mooring buoy</i>	102	83	71	69	325	81
E	Total	530	514	529	487	2060	515
	<i>Berthing/UnBerthing</i>	126	187	162	212	687	172
	<i>To/from Anchorage/Mooring buoy</i>	87	70	65	69	291	73
F	Total	539	455	498	516	2008	502
	<i>Berthing/UnBerthing</i>	126	137	184	216	663	166
	<i>To/from Anchorage/Mooring buoy</i>	86	72	70	83	311	78
G	Total	710	722	579	559	2570	643
	<i>Berthing/UnBerthing</i>	164	277	215	225	881	220
	<i>To/from Anchorage/Mooring buoy</i>	147	111	86	90	434	108

1. There were a total of 7 Class IIA pilots (pilots A to G in table above) in 2024, all of whom progressed through their pilotage career under the existing Classes of Pilotage stipulated in the Schedule 2 of Cap.84C.
2. The figures indicate the general working experiences accumulated for these 7 pilots from Class IIF to Class IIC. This could be treated as a representation of the gaining of working experiences

by an average pilot; ranging from 651 to 881 for berthing/unberthing and 276 to 434 for piloting to/from anchorage or mooring buoy,

3. The class IIC pilots, with 4 years experiences, in general have piloted at least over two thousands of ships, and half of which are berthing/unberthing and plying to/from anchorage or mooring buoy.

Proposed Amendment to Schedule 3 to Cap. 84C

Item	Existing	Proposed
<u>From Class IIF to Class IIB</u>		
1-4	No amendment is required, remain status quo.	
<u>From Class IIB to Class IIA</u>		
5(a)	A minimum of 12 months continuous experience in Class IIB.	No amendment is required, remain status quo.
5(b)	Pilotage of ships exceeding 250 metres and not exceeding 300 metres in length to or from buoys or anchorages on at least 10 occasions, of which at least 5 must commence during the hours between sunset and sunrise.	<u>Combining the experience requirement in paragraph 5(b) with paragraph 5(c).</u>
5(c)	Berthing or unberthing of ships exceeding 250 metres and not exceeding 300 metres in length to or from wharves, berths, docks or piers on at least 20 occasions, of which at least 10 must commence during the hours between sunset and sunrise.	Pilotage of ships exceeding 250 metres and not exceeding 300 metres in length to or from buoys, anchorages, berthing or unberthing to or from wharves, berths, docks or piers on at least 30 occasions, of which at least 15 must commence during the hours between sunset and sunrise.
<u>From Class IIA to Class I</u>		
6(a)	A minimum of 12 months continuous experience in Class IIA.	No amendment is required, remain status quo.
6(b)	Pilotage of ships exceeding 300 metres and not exceeding 350 metres in length to or from buoys or anchorages on at least 10 occasions, of which at least 5 must commence during the hours between sunset and sunrise.	<u>Combining the experience requirement in paragraph 6(b) with paragraph 6(c).</u>
6(c)	Berthing or unberthing of ships exceeding 300 metres and not exceeding 350 metres in length to or from wharves, berths, docks or piers on at least 20 occasions, of which at least 10 must commence during the hours between sunset and sunrise.	Pilotage of ships exceeding 300 metres and not exceeding 350 metres in length to or from buoys, anchorages, berthing or unberthing to or from wharves, berths, docks or piers on at least 30 occasions, of which at least 15 must commence during the hours between sunset and sunrise.