Legal Alert





Regulatory Update:
The Introduction of Pilot Exemption
for Masters Operating Ferry Vessels

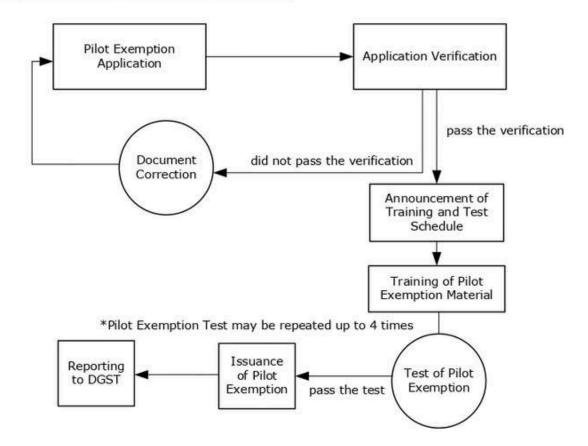


Introduction

On 11 July 2025, the Directorate General Sea Transportation ("DGST") issued the DGST Decree No. A.796/AL.308/DJPL of 2025 on Technical Guidelines for the Implementation of Pilot Exemption for Masters Operating Ferry Vessels ("DGST Decree 796/2025") which establishes a comprehensive operational framework on the issuance and utilization of Pilot Exemption Certificates (Surat Keterangan Tanpa Dipandu or "Pilot Exemption") within designated compulsory pilotage zones.

The objective of DGST Decree 796/2025 is to optimize navigational and turnaround efficiency in scheduled ferry vessel (Kapal Angkutan Penyebrangan or "Vessel") operations with a minimum of 500 Gross Tonnage (GT), particularly on high-frequency service routes, while ensuring that safety, seaworthiness and regulatory compliance are fully maintained. It sets out clear procedural requirements, qualification standards and operational conditions that must be satisfied by the Vessel's master both prior to and during the issuance of the Pilot Exemption.

Pilot Exemption Procedure Flowchart¹



The Qualification of Masters receiving Pilot Exemption²

Pilot Exemption is granted on behalf of individuals, to Vessel's masters who are qualified and fulfill the following requirements:

¹ Section I of the Appendix of the DGST Decree 796/2025.

² Section II of the Appendix of the DGST Decree 796/2025.



- Hold a minimum seafarer certificate of Third Class Nautical Officer (Ahli Nautika Tingkat/ANT-III);
- Hold a Seafarer Certification of Competency (Sertifikat Pengukuhan Keabsahan Pelaut) with the capacity of master in accordance with the restrictions specified in the Seafarer Certification of Competency;
- Have sailing experience as a master on vessels of at least 500 GT for a minimum of 2 (two) years;
- Physically and mentally fit, as evidenced by a medical certificate from a government-designated hospital through a medical check-up;
- Have conducted vessel berthing at the designated pilotage facility in the mandatory pilotage waters at least 10 (ten) times within the last 3 (three) months;
- Have attended navigation training provided by the Pilotage Supervisor (Pengawas Pemanduan);
- Have passed the Pilot Exemption test.

The Qualification of Vessels receiving Pilot Exemption³

Pilot Exemption is granted on behalf of individuals to the Vessel's master associated with the registered vessel and the proposed pilotage waters. Vessels granted Pilot Exemption has to fulfill the following criteria:

- Possess valid vessel documents in accordance with applicable laws and regulations;
- 2. Fulfill the seaworthiness requirements for vessels as established by the
- Have a fixed and regular route (liner) as evidenced by the Approval Letter for the Vessel Operation Plan on a Fixed and Regular Domestic Sea Transport Route issued by the DGST c.q. the Director of Sea Transport Traffic;
- Have a sailing plan for the next 6 (six) months with an average destination covering the mandatory proposed pilotage waters (at least 8 (eight) times in 1 (one) month);
- Have insurance for the vessel and crew.

Pilot Exemption's Training and Test⁴

A. Training for the Master

Training for the masters is conducted by the Pilotage Supervisor after the Pilot Exemption application has been completed by the applicant, with a duration of 6 (six) hours of class, with material related to the master's ability in piloting Vessel.

B. <u>Test of Pilot Exemption</u>

The Pilot Exemption Test is conducted by the Pilotage Supervisor in the form of a written test, with a minimum passing grade of 70 (seventy). In the event that the master does not pass the Pilot Exemption Test, the master is allowed to retake the test a maximum of 4 (four) times.

³ Section III of the Appendix of the DGST Decree 796/2025.

⁴ Section IV of the Appendix of the DGST Decree 796/2025.



Validity of Pilot Exemption⁵

Pilot Exemption is valid for 6 (six) months from the date of signing and can be extended once as long as the master and the Vessel concerned still meet the requirements. After the extension period, the master is required to attend training and pass the Pilot Exemption test again.

Administrative Sanctions⁶

A Vessel's master who does not use pilotage services in mandatory pilotage waters without a Pilot Exemption shall be subject to administrative sanctions in the form of:

- 1. A written warning issued by the Pilotage Supervisor; or
- Suspension of the master's certificate.

Closing Remarks

The introduction of the Pilot Exemption under the DGST Decree 796/2025 marks a significant development in Indonesia's Vessel sector, streamlining operations on high-frequency routes while maintaining strict safety and compliance standards. By establishing precise eligibility criteria, training and test procedures, the DGST reinforces its commitment to provide navigational safety.

We have a view that this constitutes a positive development for shipping companies operating Vessel, as it provides an opportunity to achieve improved operational efficiency, reduced turnaround times and more predictable service schedules.

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⁵ Point No. 4 of the DGSTY Decree 796/2025

⁶ Section VI of the Appendix of the DGST Decree 796/2025.

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