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| From: VTS Committee | ARM21-7.7.2  (VTS58-12.2.1) |
| To: ARM Committee | 26 September 2025 |

LIAISON NOTE

The use of drones for AtoN management

# INTRODUCTION

The VTS Committee has been asked by ARM to provide VTS technical comments on their draft guideline entitled “The use of drones for AtoN management”.

# VTS Committee Comments

VTS Committee welcomes the draft Guideline and acknowledges the work and effort undertaken to produce this excellent document. We have reviewed the draft Guideline and have the following comments and proposals:

* As an IALA Guideline, the VTS Committee acknowledges the details in the draft Guideline. However our assertion is that the areas covered in paragraphs 6, 7 & 9 seem superfluous. These are industry standard operational and maintenance practises and are arguably not required in an IALA Guideline. Can we simply refer to that fact that any drone operations should follow national regulations and industry standards?
* We would suggest that the title of the Guideline should include a reference to VTS infrastructure, but also that AtoN is being spelled out. Our suggestion is “Drone Operation for Marine Aids to Navigation Management and VTS Infrastructure”.
* In section 1 “Introduction” the text should include a reference to VTS and we offer the following revised wording:

“During the inspection of marine Aids to Navigation (AtoN), such as lighthouses and other AtoN as well as VTS-related infrastructure, on-site inspectors may encounter challenges accessing the site directly. This can expose them to safety risks and limit the ability to thoroughly assess facility conditions. Drone inspections could therefore be particularly effective during adverse weather conditions, such as high seas, if access is only possible from the sea or if the geographic terrain or location on land presents vehicle access issues. It should also be acknowledged that adverse weather conditions at sea might also impact drone operations.

* The Introduction section would also benefit from a statement about “Line of Sight” and “Beyond Visual Line of Sight”, which is an important parameter when operating a drone. See below for suggested text to be added to end of the Introduction section.

*“It should be noted that this guideline only covers “Line of Sight” drone operation. Any drone activity involving “Beyond Visual Line of Sight” (BVLOS) operations, a new set of rules and associated guidance will apply.*

*BVLOS operations involve flying a drone or other unmanned aircraft without the pilot maintaining direct, unaided visual contact with the aircraft, but instead using technology to monitor and control it. This mode of operation allows drones to fly at greater distances for applications like long-distance deliveries and infrastructure inspections. Because BVLOS operations introduce increased risk due to the inability to see the drone, they are heavily regulated by aviation authorities and require specific operational authorizations or waivers before they can be conducted.”*

* In section 2 “Scope” we suggest adding another bullet point and text as follows:
  + ***VTS infrastructure inspection & monitoring***

*Drones may be used to carry out inspections on structures that directly support VTS, such as shore/offshore based radio and radar, in sites which might present access challenges such as the presence of a supporting tower structure.*

* In section 3 “Application Scenarios” we suggest inserting a new paragraph 3.4 as follows:

***3.4 VTS Infrastructure Inspections and Monitoring”***

*Inspection of VTS sensors such as radar, radio and related structures and services which support VTS operations.”*

The paragraph entitled “Other Application Scenarios” will then become section 3.5.

* In section 3.4 (or new 3.5) “Other Application Scenarios” we suggest adding a bullet point as follows:
  + *Assistance in incident management, where applicable.*
* In section 6.4.3 “Flight Areas and Restrictions” we suggest adding a new bullet point as follows:
  + *In certain instances VTS sensors might form part of critical national infrastructure which may require the drone operator to obtain additional approval from the appropriate government agency.*

# ACTION REQUESTED

The ARM Committee is requested to:

1. Consider the response and suggestions from the VTS Committee; and
2. Take action accordingly.