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| From: The IALA VTS Committee | VTS35/output/8 |
| To: The IALA Council | 7 Sept 2012 |

Information Paper

GUIDANCE FOR IMO DOCUMENT REVIEW

# Introduction

In the final report of VTS 34, the VTS Committee invited Council to consider drawing the attention of IMO to the urgent need for the entire SMCP document (IMO Resolution A.918(22) Standard Marine Communication Phrases) to be updated. In response Council, noting that a procedure has still to be decided on, tasked the Secretariat to consider what would be the best way to review SMCP. The VTS Committee also noted the report (VTS 35/44) that an IALA proposal, relating to training navigating officers in VTS, was rejected by IMO at STW 43. Additionally, the Secretariat indicated that feed-back had been received that some IMO members regarded VTS as a national matter and were resistant to changes to IMO recommendations.

Task 3 (*Review/update/provide input to IMO Resolution A.857(20) – Guidelines for Vessel Traffic Services*) was due to complete by the end of VTS 35 and, to this end, the committee sought advice from RAdm Jean-Charles Leclair, the Accredited Representative of IALA to IMO, on how this task should be presented and how it should be submitted. The response identified that IALA does not have the right to present a proposal of this nature to IMO in its own right and that the correct avenue for such inputs would be through Voluntary Member Government(s). RAdm Jean-Charles Leclair suggested that IALA might have a role in assisting in the coordination of such a submission and suggested further that the new task on the ‘IALA VTS Strategy Paper’ should precede the development of any such submission. In view of this advice, the VTS Committee has chosen to put on hold Task 3, which was due at the end of VTS 35, pending clarification of processes for IMO documents where IALA perceives the need for their review and update.

This Information Paper addresses the task placed on the Secretariat relating to SMCP and considers further the implications regarding VTS Committee tasks that relate to other IMO documents.

# Generic Considerations Relating to IMO Documentation

As the VTS Committee reaches the point of delivering outputs to tasks relating to IMO documentation for finalisation, it is becoming clear that the Committee may not have considered in sufficient detail the processes for their subsequent staffing. The VTS Committee has, arguably, been too close to issues and has assumed that any shortcomings are readily understood and accepted. This has resulted in some tasks being forwarded for Council approval that are aimed at providing a solution with insufficient focus on identifying the compelling need. Formal identification of the need may not be necessary for documentation wholly within IALA’s ownership but is vital for documents sponsored or owned by IMO.

As IALA does not have the right to propose changes to IMO in its own right, this means that work on IMO documentation must follow a different route to those wholly within IALA’s ownership. In the case of proposed amendments to IMO documentation it is considered that a phased approach is necessary. In the first instance, IALA should establish the compelling need for change and, in the process or subsequently, IALA should identify national representatives who are willing and able to become co-sponsors to take forward a submission to the appropriate IMO Committee. This should, ideally, be by a significant number of Governments from different parts of the world. IALA would, therefore, have a role in drawing together IALA members and assisting in the development of a submission that is acceptable to the widest possible IALA and IMO membership. IALA would have a secondary role in lobbying IMO and national delegations but on an informal basis. It follows, therefore, that IALA tasks relating to IMO documentation should be written in a form that identifies how the output is to be staffed and processed beyond IALA.

# Specific Considerations Relating to IMO Documentation on the Current Work Programme

Three tasks in the current work programme relating to IMO documentation:

* Task 2 (VTS beyond territorial seas). Council approved the VTS Committee’s proposal that this task should not be progressed further at present recognising that there was no obvious avenue for staffing this through IMO beyond the issue of IALA Guideline 1071. This guideline was completed in the previous work programme and identified how interpretation of existing IMO documentation might be used to achieve the aim. With the acceptance of this guideline, it is considered that, at this moment, there is no compelling need for change.
* Task 3 (Review/update/provide input to IMO Resolution A.857(20) – Guidelines for Vessel Traffic Services). Reference to this task goes back to at least VTS 17 (2002). Whilst it has been claimed to be an urgent task, progress has been slow and the “compelling need” has not been formally stated nor has the process for staffing this task through IMO been identified. It is interesting to note that, despite the length of time this task has been on the task list, amendments that have been proposed to date are almost entirely related to Annex 2 on recruitment, qualifications and training. This illustrates the need to introduce a more disciplined approach to identifying the “compelling need”. In view of the generic considerations set out above, it is suggested that work on this task be placed in abeyance until such time as the new task, Task 21, to develop an ‘IALA VTS Strategy Paper’ is complete as this is likely to include issues relevant to identifying the compelling need for IMO Resolution A.857(20) to be updated.
* Task 14 (Review SMCP as it relates to VTS and communicate suggested changes to IMO). VTS is but a small part of this document that relates to a multitude of both on-board and off-board uses. The reference to Message Markers is of key importance but, otherwise, this document is of limited use comprising a huge number of largely random phrases that are unlikely to be easily remembered in an emergency or in the context for which they are designed. Whilst this may be obvious to VTS practitioners, this may not be so evident to the general IMO membership. In view of the generic considerations set out above, it is suggested that the focus of this work be adjusted to identifying to IMO the compelling need for change and that the task be retitled **“Identify the need for SMCP to be updated. If required, identify nations prepared to take forward an IMO submission and for IALA to assist in the coordination of the submission”**.

# Action requested

Council is requested to note the observations above and to consider the following recommendations:

1. IALA procedures should specify that tasks relating to documents sponsored or owned by IMO should identify how the IALA output is to be taken forward to IMO. This might include either assistance in the development of a co-ordinated case for adoption by a group of nations and subsequent submission to the appropriate IMO Committee and/or informal lobbying by IALA of other delegations/key IMO officials. The task should normally concentrate on identifying the need for change unless the inclusion of a solution is self-evident.
2. Work on Task 3 (Review/update/provide input to IMO Resolution A.857(20) – Guidelines for Vessel Traffic Services) should be placed in abeyance until Task 21 Prepare an ‘IALA VTS Strategy Paper’ has concluded.
3. Work on the existing Task 14 (Review SMCP as it relates to VTS and communicate suggested changes to IMO) be adjusted to identifying to IMO the compelling need for change and that the task be retitled ‘**Identify the need for SMCP to be updated. If required, identify national administrations prepared to take forward an IMO submission and for IALA to assist in the co ordination of the submission.’**