**VTS49-8.2.6.2**

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|  | *Version Number:* | *Final* |
|  | *Date:* | *21 August 2020* |

**Update to Proposed New Guideline 1089 – Summary of Comments and Actions Taken**

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| This document collates the comments / suggestions received on a revised draft input paper developed from input paper VTS48-8.2.5 and the draft revision to Guideline 1089, input paper VTS48-8.2.5.1 prepared and promulgated for VTS48. This document will also record the action taken or the response from the review group as appropriate.  Comments/Suggestions will be reviewed by the co-sponsors of the original proposal for VTS 48 (AMSA, IHMA & NLC). Any proposals not incorporated in the updated draft will be recorded and annotated in this document for further discussion at VTS49 as appropriate. |

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| **Ref**  **No** | **Section / Sub-section** | **Date Received** | **From/Comments/ Suggestions Received** | **Action/Response (Date)** |
| 1 | Contents | 1/07/20 | NI (Jillian Carson-Jackson)  Numerous amendments to page references | **Response (21/07/20)**  Agreed.  **Action:** Contents list to be updated when document finalised |
| 2 | 1 | 25/06/20 | UK (MCA)  857 says that a VTS is implemented by a Government (implemented meaning put in to effect), the old one said competent authority, but surely it could be a government (coastal VTS) but also a harbour authority, following their R/A. | **Response (21/07/20)**  SOLAS Chapter V Regulation 12 refers to Contracting Governments with regards to establishing, planning and implementing VTS. In addition, the current draft of the revised Resolution states at 2.1 “Vessel traffic service (VTS) means a service implemented by a Government …..”. The Cambridge dictionary gives the example of “The country had been slow to implement the new European directive”. This implies “implementing” in a legal sense, which is what the draft revision to A857 intends. Unless this is amended by IMO prior to adoption, we should carry forward the same terminology in 1089.  However, this comment stimulated a further review of section 1. The quote would be better as an introduction to section 3 and a new quote lifted from the resolution to provide a linkage to the next paragraph on the status of IALA standards  **Action:** Move quote to section 3 and add new quote to section 1 |
| 3 | 2 | 1/07/20 | NI (Jillian Carson-Jackson)  Amend “*internationally approved guidelines and IALA Standards*” to read “*IALA Standards and internationally approved recommendations and guidelines*” | **Response (21/07/20)**  Current wording is designed to follow on from section 1 which refers specifically to the IMO “Guidelines for VTS” and paragraph 2 also deliberately refers only to IALA standards as the high-level reference rather than guidelines and recommendations. IALA Standards draw on the IMO Recommendation so the order of reference to “international guidelines” before “IALA Standards” is considered to be more appropriate. However, specific reference to the revised resolution rather than a more general reference to internationally approved recommendations and guidelines will be made and the text in the box amended to align with the new IALA VTS Manual.  **Action: S**pecific reference to the revised resolution rather than a more general reference to internationally approved recommendations and guidelines to be made and the text in the box amended to align with the new IALA VTS Manual |
| 4 | 3, 4 & 5 | 25/06/20 | UK (MCA)  Throughout the document there are numerous references to both ship and vessel. I assume (probably incorrectly) that it is because a lot of the passages are copied and pasted directly from the original 1089 document, which only refers to vessels. This is confusing (see 2nd bullet point in section 4.2). If this is deliberate, what definitions are they using to separate a ship from a vessel? Is a tug a vessel or a ship? It might be that I am missing something and that everything is covered by the term “participating ship”, but once again I think that it would be confusing for a vast number of overseas countries to know exactly which is which. | **Response (21/07/20)**  Comment: IMO is now providing clarity through the refinement of the revised Resolution.  Convention used is for Vessel to be used for Vessel Traffic Service(s) and ships to be used elsewhere.  Revised 1089 should follow this convention.  **Action:** Numerous entries of “*vessel*” in these sections to be amended to read “*ship*”. |
| 5 | UK (MCA)  If the guideline is to refer to ship instead of vessel, how will this align with the Colregs? Are we to have ‘power driven ships’ instead of power driven vessels? | **Response (21/07/20)**  Lengthy discussions took place over “ship” or “vessel” as there is so much inconsistency in IMO documentation as you note here. For now, we will follow the convention being used by IMO in the drafting of the revised VTS Guidelines. In practical terms, it will not affect the application of the COLREGS as it applies within a VTS Area.  **No change** to the draft of 1089 other than that identified above is planned. |

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| 6 | 3 | 1/07/20 | NI (Jillian Carson-Jackson)  At end of the first sentence, amend “*as appropriate*” to read “*to support safe, efficient and pollution free transits*” | **Response (21/07/20)**  Noted. However, the whole of this introductory section has been revised and reworded with the incorporation of the quote from section 1 and to provide a better lead into the next two sup-sections. In addition, section 3.1 has been revised and rationalised to include resolution extract relating to participating ships quoted in 3.2.  **Action:** Introductory section to be revised with the inclusion of the resolution quote from section 1 and revised text to read:  “*VTS operates within a comprehensive environment in which ships, ports, allied services and other organizations fulfil their respective roles, as appropriate. Key factors in delivering VTS include:*   * *The regulatory and legal framework for VTS; and* * *How interactions are conducted between VTS and participating ships.”.* |
| 7 | 3 | 25/06/20 | UK (MCA)  3.0 says "interaction with participating and allied".......... surely there should be vessel/ship after participating? | **Response (21/07/20)**  Agreed. However, the whole of this introductory section has been revised and simplified  **Action**: As above. |
| 8 | UK (MCA)  I also think a comma (to be added) is missing between VTS and authorities in the next paragraph, but that does raise the issue of why are we talking about a VTS Authorities when 857 has made that term redundant? | **Response (21/07/20)**  Comment: Agreed comma is missing and there is no intention to make reference to VTS Authorities. However, this has caused the reviewers to revise this section.    **Action**: As above.. |
| 9 | 3 | 1/07/20 | NI (Jillian Carson-Jackson)  In second paragraph add comma after “VTS” and then add text “*IALA Standard 1040 notes that Members and Marine Aids to Navigation Authorities*” | **Response (21/07/20)**  Need for amendment noted but this is addressed by more comprehensive change above.  **Action**: As above. |
| 10 | 3 | 1/07/20 | NI (Jillian Carson-Jackson)  Amend the final sentence of the second paragraph to read “*In particular these normative provisions include IALA Recommendations relating to:*” | **Response (21/07/20)**  Need for amendment noted but this is addressed by more comprehensive change above.  **Action:** As above. |

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| 11 | 3.2 | 1/07/20 | NI (Jillian Carson-Jackson)  Delete “*or otherwise unnecessarily interfere with the bridge team operations*” from final sentence of the penultimate paragraph. Add new final sentence to read “*Interaction with VTS should always support the bridge team operations:*” | **Response (21/07/20)**  Current wording was taken from extant A.857(20). However, the proposed amendment has highlighted the fact that this section needs to be more closely aligned to the new resolution. The Regulatory reference to the new resolution has been moved into section 3.1 and section 3.2 redrafted and also incorporates the entire section on Communications and Message Markers.  **Action:** The Regulatory reference to the new resolution to be moved into section 3.1 and section 3.2 redrafted and also incorporate the entire section on Communications and Message Markers.. |
| 12 | 3.2 | 30/06/20 | Dutch Pilots' Corporation (Captain Ed VERBEEK)  I do have a remark about section 3.2, interaction with participating ships. At present the Guideline only refers to 6.1.3 of the Resolution. I appreciate all work that has gone into the Resolution and the very carefully worded result. I am afraid that omitting 6.1.2 might lead to a misunderstanding of the intricacies of the interaction with participating ships. I would like to propose that 6.1.2 be added.  Although I don’t think that it is required, to achieve complete harmonisation with the Resolution, the entire relevant section of the Resolution could even be added, see attached document. | **Response (21/07/20)**  Agreed. Paragraphs 6.1.1 – 6.1.3 from the revised resolution to be incorporated in text moved to section 3.1  **Action:** Paragraphs 6.1.1 – 6.1.3 from the revised resolution to be incorporated in text moved to section 3.1 |
| 13 | 3.2 | 24.6/20 | VisSim (Peter Eade)  Section 7.5 of the new resolution recommends harmonised data exchange and automated reporting. Should this be reflected in section 3.2 of the new G1089? This would be a lead in to proposed eNavigation services and would help ensure that communications are timely, clear, concise ad unambiguous. It probably only needs a statement such as “Automated means of communication between the ship and the VTS are recommended where these are available.” or something similar | **Response (21/07/20)**  Noted, however, it is considered that this can best be captured in section 4.1.1  **Action**: New third bullet to be added in section 4.1.1: “*Automated means of communication as appropriate and where these are available*”. |
| 14 | 3.2 | 1/07/20 | NI (Jillian Carson-Jackson)  Final paragraph: End final sentence at “*misinterpretation*” and delete “*to*” that follows. Start new final sentence with “*This minimises*….”. | **Response (21/07/20)**  This paragraph is more relevant to section 6. It should be modified accordingly taking into account this comment and transferred to open this section.  **Action:** Modify and transfer to the beginning of section 7 (previously 6) |

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| 15 | 4 | 1/07/20 | NI (Jillian Carson-Jackson)  Need for consistency in capitalisation of terms “competent authority” and “VTS provider” | **Response (21/07/20)**  New guideline should conform with NCSR agreed draft of revised Resolution. However, in this draft, competent authority is used with both an upper case and lower case “c” for competent. It is believed that the lower case “c” is the proper form for IMO documents and amendment to para 5.2 of the draft resolution is required. VTS provider is shown with a lower case “p” throughout and the guideline needs to be amended accordingly.  **Action**:  1. Input paper to include recommendation for IALA Secretariat to propose amendment to IMO for “Competent authority” in para 5.2 of Draft resolution to be a lower case “c”.  2. “*VTS Provider*” to be amended to “*VTS provider*” in six places in this draft guideline. |
| 16 | 4.1 | 24/6/20 | VisSim (Peter Eade)  Section 5.1.4 of the new resolution states that Contracting Governments should take account of future technical and other developments recognised by the organization related to VTS. The IMO Greenhouse Gas strategy aims to reduce emissions from ships by 50% by 2050 and part of this strategy relates to optimization of route and speed in order that ship emissions can be reduced (by reducing speed where possible). It therefore follows that timely and relevant information provided by a VTS to a ship will now need to include “any information that enables the ship to reduce its emissions during its voyage.” This should be added to the list of bullets in section 4.1. Whilst, I note that section 4.1 is not a complete list, I think that with the current political focus on climate, this should be added to your document. | **Response (21/07/20)**  Agreed  **Action**: New third bullet to be added “*Scheduling information that may assist a ship to improve its overall passage efficiency*;”. |

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| 17 | 4.1. | 1/07/20 | NI (Jillian Carson-Jackson)  Amend bullets as follows:   1. Add acronym *“(MSI)”* after “*Maritime safety information*” 2. Delete “*Any*” before “*information concerning the safe navigation.*.”. 3. Re word “*Support to, and cooperation with, allied services*” to read “I*nformation to / from allied services*”. 4. Delete “*The*” before “*mandatory.*.”. | **Response (21/07/20)**  a. Agreed  b. Agreed  c. Agreed  d. On review, it is considered that this refers to mandatory reporting points where ships report to the VTS and not vice versa. This bullet should be deleted.  **Actions:**  a. Add acronym *“(MSI)”* after “Maritime safety information”  b. Delete “*Any*” before “*information concerning the safe navigation.*”.  c. Re word “*Support to, and cooperation with, allied services*” to read “*Information to / from allied services*”.  d. Delete bullet “*The mandatory reporting of vessel traffic movements”.* |
| 18 |  |  | NI (Jillian Carson-Jackson)  Comment that bullet: “*Meteorological and hydrological conditions, notices to mariners, status of aids to navigation*” are examples of MSI related to 2nd bullet. | **Response (21/07/20)**  Agreed  **Action:** Move final bullet “*meteorological and hydrological conditions, notices to mariners, status of aids to navigation*” and add as examples at the end of the 2nd bullet “*Maritime safety information*” |
| 19 | 4.1.2 Table | 1/07/20 | NI (Jillian Carson-Jackson)  Consistency in formatting – all bullets or not. I prefer separating the item into individual bullet points | **Response (21/07/20)**  Agreed. Also, some examples are incorrect and should be amended or deleted.  **Action:**  1. All entries in this table bulleted, 1st word of each bullet starting with a capital and semi-colon added as appropriate.  2. Also applies to table in 4.3.5  3. Introduction “*Information that will include the.*.” and “*Information that will include factors such as the*..” in example columns of Meteorology and Hydrography rows are superfluous – Delete.  4. Delete or amend incorrect examples. |

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| 20 | 4.1.2 Table  (Row - Nav warnings) | 1/07/20 | NI (Jillian Carson-Jackson)  Move “*obstacles not otherwise promulgated*” to end of list | **Response (21/07/20)**  A dangerous wreck is an obstacle and, for the purposes of this Guideline, “uncharted” is considered to be more appropriate and avoids debate over an obstacle that might have been promulgated by, say, NAVWARN, but considered to be so significant that the VTS still considers it appropriate to issue a warning about it.  **Action:** Amend first bullet to read “*Uncharted obstacles such as dangerous wrecks;*” |
| 21 | 4.1.2 Table  (Note beneath table) | 1/07/20  16/08/20 | NI (Jillian Carson-Jackson)  Annex with examples using message markers no longer included – I expect this is because IALA now has the guideline on VHF Voice Communication? If so, perhaps a reference to that document can be made?  MSI is suitable to be referenced, noting it is a recognised activity. I see there is no acronym list in the document – usually IALA documents include an acronym list. to the acronym list, along with WWNWS | **Response (21/07/20)**  Guideline 1032 is being revised and will incorporate the additional work on phraseology. This note refers specifically to IMO documentation on MSI. Reference to Message markers is not considered appropriate here and a full section on Message Markers at the higher-level is at section 3.2 & 3.2.1.  **Response (18/08/20)**  With the inclusion of the acronym MSI in 4.1 above, the acronym has been used in place of the full title. Acronym WWWNWS to be added. (See also general comment on Acronym List below).  **Action:** Amend note to read MSI vice the full title and add acronym. WWWNWS |
| 22 | 4.2 | 1/07/20 | NI (Jillian Carson-Jackson)  Amend the opening paragraph to read: “*The monitoring and management of ship traffic is a core function of VTS to mitigate the development of dangerous traffic situations. This also facilitates the safe and efficient movement of vessel traffic within the VTS area through the operational management of traffic and the planning of vessel movements. It is particularly relevant in times of high traffic density or when vessel movements may affect the traffic flow*”. | **Response (21/07/20)**  This comment highlights the fact that the current text is clumsy and duplicates higher-level guidance in this and previous sections. Some items identified in this opening paragraph appear in the bullets, incorrectly inferring that these are more core than the others. The first paragraph is unnecessary and should be deleted.  **Action:** Delete the opening paragraph of 4.2 |
| 23 | 4.2 | 24.6/20 | VisSim (Peter Eade)  The second paragraph of section 4.2 (Monitoring and Management of Ship Traffic) should include the “reducing ship emissions” alongside safety and efficiency. Existing bullets such as forward planning, voyage or passage plans and routing advice will all help the VTS to reduce emissions from incoming and departing ships etc.. | **Response (21/07/20)**  The inclusion of the additional bullet in 4.1 is considered adequate to identify the main role of a VTS in contributing to emission management. It is not felt that the addition of a further bullet fits into the general framework of section 4.2.  **No further action intended.** |

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| 24 | 4.2  (bullets) | 1/07/20  16/08/20 | NI (Jillian Carson-Jackson)  Add “*water*” before “*space allocation*”  This remains confusing. I understand you have left it to keep in line with the IMO resolution, but the guideline should provide guidance. The concept of ‘space allocation’ has caused trouble in my discussions with those looking to implement a VTS – what space are they allocating? I explain it by water space allocation – and then link that to the concept of each ship having its own ‘domain’ (or ‘bubble suit). For this guideline it would be very useful to provide the added text to verify what is actually meant by ‘space’ allocation. | **Response (21/07/20)**  Both the current A.857(20) and the proposed new draft refer only to “space” without the prefix “water”. This guideline should conform.  **Response (21/07/20)**  Whilst it is recognised that water-space has become a term adopted in wider maritime circles, Google returns only two definitions:  - a Military reference to the 3D allocation of an area within the water column for submerged submarine operations, and  - An engineering term for that part of a steam-boiler which lies below the steam-space.  It is possible, therefore, that IMO has deliberately chosen to use just space rather than water-space.  Arguably, a ship has more volume out of the water than in it and it is unclear why just using “space allocation” should cause confusion when moving on to the more complex matter of domain theory.  The term “bubble” comes from the full VTM concept, which has led to a lot of discussion and has not been implemented. This term has been avoided.  Rather than risking the danger of encouraging debate where none is needed, it is preferred to conform to IMO wording.  **No action intended.** |
| 25 | 4.2  (bullets) | 1/07/20 | NI (Jillian Carson-Jackson)  Perhaps include an e.g. – for example, TSS? after “*Establishing special routes to be followed*” | **Response (21/07/20)**  Establishing a TSS goes well beyond what might normally be expected of a VTS. It is intended to reflect the establishment of recommended or advisory routes, which might, perhaps, be a clearer description.    **Action:** Amend to read: *“Establishing recommended or advisory routes to be followed*” |
| 26 | 4.2.1 Table  (Traffic Clearance) | 1/07/20 | NI (Jillian Carson-Jackson)  Remove unintended bullet between “VTS” and “area”. | **Response (21/07/20)**  Agreed. Grammar in first bullet also needs correcting.  **Action:** !st bullet correct grammar and 2nd/3rd bullet, remove unintended bullet between VTS and area. |

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| 27 | 4.2.1 Table  (Traffic Clearance) | 25/06/20 | UK (MCA)  The definition of a Traffic Clearance has disappeared (was in Table 2 of section 2). It has been replaced by ‘Examples’ and now has the headline of ‘Give authorisation under conditional circumstances to a vessel when:…”.  Personally, I think the definition could remain and happily co-exist with the Examples? The same could be said of the definitions of a VTS Sailing Plan (still referred to in the new 1089) and VTS Traffic Image (basis of the all responses by a VTS and interestingly it no longer features in the new IMO resolution) which have both been deleted in the new text. [Unless they appear in another IALA document and I have missed them?] | **Response (21/07/20)**  Definitions are no longer included. It is not intended to reinstate definitions and further guidance on traffic clearance procedures are being included in an updated version of G1132 - VTS VHF Voice Communication which will be expanded to provide guidance on standard phraseology and G1141 – Operational Procedures as appropriate.  The opening text of each set of examples is superfluous and, for consistency, should be deleted.  VTS Sailing plan was deliberately dropped from the revised Resolution as it only appears in the existing VTS Resolution and its practical use is doubtful. The new resolution makes reference to a “passage plan” (3.1.2.5) which is more appropriate.    **Actions**:  1. Delete introductory text from each set of examples in this table.  2. Reference to “*VTS Sailing plan*” in section 4.2.1 needs to be amended to “*passage plan*” to align with the new Resolution. (see also next comment and response). |
| 28 | 4.2.1 Table  (Traffic Clearance) | 1/07/20 | NI (Jillian Carson-Jackson)  Separate out the “*Examples of some conditions*” into a separate row entitled “*Conditions*” | **Response (21/07/20)**  It is agreed that these examples do not belong to this row entitled “Traffic clearance”. However, it is felt that they actually fit more appropriately under the final row of the table entitled “waterway (sea, channels and fairway) management” and the title amended. The overall number of examples is excessive and should be reduced to emphasise the more important examples.  **Actiond:**  1. Move the examples (with inclusion of the amendment in the comment above) under the heading “Examples of some conditions” into the “waterway management” row.  2. Amend title of this row to read “*Waterway management (sea, channels and fairway)”.*  3. Delete less significant examples. |
| 29 | 4.2.1 Table  (General) | 1/07/20 | NI (Jillian Carson-Jackson)  Several suggested amendments to ensure generic consistency between terms that reflect “do” and those that reflect “doing”. | **Response (21/07/20)**  The need for consistency is agreed. Alternative amendments have been made to those proposed.  **Action:** Amend all examples in the table so that they end in “..*ing*” |

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| 30 | 4.3 | 25/06/20 | UK (MCA)  A857… refers to ‘ships’ throughout, which I assume is deliberate (I’ll comment further in 1089). However, in 3.2 in states “ a ship deviating from the route”. Should it not be “it’s route” or “it’s intended route”? I think it may be confusing for those that don’t speak English as a first language. | **Response (21/07/20)**  Comment: It is understood that the wording in the draft resolution has been left deliberately broad. G1089 would only be changed if there is a change to the revised resolution.  (Note – Action on amending “vessel” to read “ships” is covered in comments Ref No 4 and 5 - marked “3, 4 & 5 in the “Section / Sub-section” row)  **No further action intended** |
| 31 | 4.3 | 1/07/20 | NI (Jillian Carson-Jackson)  The response is not only to the specific vessel involved, It may include, for example, interaction with other vessels in the area, dealing with allied services, or implementation of a contingency plan.  Add new introductory paragraph “*The monitoring and management of ship traffic is a core function of VTS to mitigate the development of dangerous traffic situations. This also facilitates the safe and efficient movement of vessel traffic within the VTS area*”.  Then amend the existing paragraph to follow this to read: “*Through the monitoring and management of ship traffic, the VTS can identify developing unsafe situations and respond in a timely manner. This response may focus on operational response to ships in the area and allied services, or by providing of support to the navigational safety of a specified ship. The response may include the provision of essential navigational information to assist on board navigational decision-making, the provision of navigational advice and/or instruction*”. | **Response (21/07/20)**  Amendments to the introductory paragraph of section 4.2 are intended to align with that of section 4.1 and to provide a short introductory statement. The new text proposed for section 4.3 is very much more complicated than the existing introductory paragraph and covers aspects either covered elsewhere or more suited to other guidelines. Whilst the scenario postulated that justifies this overall amendment is accepted, it is considered to be too detailed for this guideline which is intentionally maintained at high-level.  **No further action intended** |
| 32 | 4.3 | 1/07/20 | NI (Jillian Carson-Jackson)  In first set of bullets, move “and” from bullet on “grounding or collision” to end of penultimate bullet. | **Response (21/07/20)**  Agreed  **Action:** Move “and” from bullet on “grounding or collision” to end of penultimate bullet |
| 33 | 4.3 | 1/07/20 | NI (Jillian Carson-Jackson)  General comment – are we using vessel or ship? | **Response (21/07/20)**  Agreed. Action on amending “vessel” to read “ships” is covered in comments Ref No 4 and 5. Also “VTS” to be deleted before “passage plan” in this bullet for consistency with draft resolution and the rest of the document. (see comment Ref No 27 at 4.2.1 Table (Traffic Clearance) by UK MCA)  **Action:** “*VTS*” to be deleted before “*passage plan*” |

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| 34 | 4.3  (para following first set of bullets and the 2nd set of bullets) | 1/07/20 | NI (Jillian Carson-Jackson)  Not really the exact words – but getting to the examples in Hay Point and Melbourne, where the pilots and VTS have trained together, identified procedures and terminology to use to provide the additional support during particular movements. The wording ‘as part of VTS’s operational procedures’ is really not correct, as the other two elements would also be in the operational procedures. Amend second sentence of paragraph following the first set of bullets to read: “*The provision of navigational support would be identified in the VTS operational procedures is likely to be required*”.  3rd bullet that follows, delete “*As part of a VTS’s operational procedures*” and replace with “*As agreed between the users of the port*”. | **Response (21/07/20)**  We appear to be agreed on the intention of this part of the document but this proposed amendment implies that all three circumstances are local procedures whilst this document seeks to identify global consistency.  The first two circumstances of either requested or observed have been previously identified under existing IALA guidance. The third relates to the recognised practise in some ports (as in the example quoted) whereby VTS supports trained and practiced users with tailored navigational information as part of an established procedure. The situation would be global but the specific local procedure would be very dependent on local circumstances – which is why the detail in section 4.3.3 is kept to the absolute minimum. (It is, however, essential that this circumstance is not confused with remote pilotage and this is elaborated upon in response to the comment that follows).  However, this comment stimulated an in-depth review of this entire section which is very important but could be better structured and is over-complex. The final four paragraphs of this section are either covered elsewhere in the document, or should be transferred into another section, or should be covered in other guidelines. The entire section has been simplified, restructured and revised to improve readability and clarity. The intent of section 4.3.4 “Conclusion of Support” has been broadened and transferred as an additional bullet under “Key considerations” in this section  **Action:** Revise and simplify section 4.3 to improve readability and clarity. Delete section 4.3.4 and add appropriate bullet to 4.3 under “Key Considerations”. |
| 35 | 4.3  (para following 2nd set of bullets) | 1/07/20 | NI (Jillian Carson-Jackson)  But, do we really need this sentence at all? I would prefer it be removed.  Propose amend “*Navigational support should never be considered to be an alternative to pilotage*.” to read “*Navigational support is an important supplement to the provision of other navigational services, such as pilotage*. | **Response (21/07/20)**  The clear distinction between “responding to developing unsafe situations” as described in the new resolution (or NAS as currently identified) and remote pilotage has been a very contentious area and IALA’s position is that VTS has nothing to do with the latter. The inclusion of this sentence is considered to be as important and relevant now as it always has been. It is felt that the proposed amendment dilutes this strongly held position and the spirit of the existing text should be retained in the revised text (see above). It should be retained as a bullet under the paragraph now starting “Key considerations in responding to developing unsafe situations include:” in this section  **No action intended** |

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| 36 | 4.3  (para following 2nd set of bullets) | 1/07/20 | NI (Jillian Carson-Jackson)  Break up one rather long sentence into two parts by concluding the first sentence after “..*the situation that required navigational suppor*t”, starting a second sentence with “*This could include regaining.*.” and deleting the existing words between “*support*” and “*regaining*” | **Response (21/07/20)**  Agreed. Should be amended and included as a bullet under “Key considerations”  **Action:** Amend and include in the bulleted list of key considerations (see above). |
| 37 | 4.3  (2nd para following 2nd set of bullets) | 1/07/20 | NI (Jillian Carson-Jackson)  Delete “*and, specifically, the responsibility for collision avoidance*”. | **Response (21/07/20)**  This paragraph repeats the responsibility of the master set out in the resolution and quoted in section 3.2. There is no requirement to incorporate this paragraph again in the revised text for this section.  **Action:**  Do not include in the revised text. (see above) |
| 38 | 4.3  (penultimate para) | 1/07/20 | NI (Jillian Carson-Jackson)  Amend opening sentence to form introduction to a separate paragraph that reads:  *“The degree of navigational support provided will depend on many factors including:*   * *VTS Operator ability to provide the support;* * *Status of the waterway, including other vessels in the area and weather conditions;* * *Equipment capabilities and limitations; and* * *Clarity of communications between VTS and vessel”.*   Note against second bullet: Yes, but sort of just dropped in here – I picked a few points from the annex of the existing document instead. | **Response (21/07/20)**  Agreed in principle and adds clarity. However, VTS operator training and authorisations are fully covered in the paragraph that follows rendering the first bullet unnecessary.  **Action:** Amend as proposed without first bullet and include as a bullet under “Key considerations (see above). |
| 39 | 4.3  (new penultimate para) | 1/07/20 | NI (Jillian Carson-Jackson)  Open the new penultimate paragraph with: *“The provision of navigational support may differ depending on..”* | **Response (21/07/20)**  Incorporated in action above  **Action:** Incorporate in above |
| 40 | 4.3  (new penultimate para) | 1/07/20 | NI (Jillian Carson-Jackson)  Replace “*Whilst*” with “*While*”. | **Response (21/07/20)**  The level of detail on training is too detailed for this document. Matter relating to powers and scope are covered elsewhere. This part of the paragraph should be deleted.  **Action:** Delete final sentence commencing “Whilst generic training..” |
| 41 | 4.3  (final para) | 1/07/20 | NI (Jillian Carson-Jackson)  Delete “..*which might provide other vessels with additional situational awareness,* ..” from existing final paragraph and use to form new final sentence that reads: “*The benefit of remaining on the main working frequency of the VTS sector is that this may provide other vessels with additional situational awareness*”. | **Response (21/07/20)**  Simplified version of this paragraph included as a bullet under “Key considerations”  **Action:** Amend and include in the bulleted list of key considerations (see above). |
| 42 | 4.3.1, 4.3.2 & 4.3.3 | 1/07/20 | NI (Jillian Carson-Jackson)  4.3.2 – Between *“.., the initial intervention by the VTS will.*.” and “..*invariably need to be carried out*..”, add “..*be required in a timely manner. The initial intervention will*..”  4.3.3 – Amend 1st sentence to read: “*Specific instances for navigational support may be identified for specific activities within the VTS area. These will be included within the standard operational procedures for reference to those activities.”* | **Response (21/07/20)**  The text in sections 4.3, 4.3.1, 4.3.2 & 4.3.3 has been significantly revised providing a linkage to the relevant bullets in 4.3 (as amended) and rewriting the sub-sections to keep them at a high-level and to present them in a common structure. The textual amendments proposed here have been taken inot account.    **Action:** Review and rewrite all three sub-sections to align with the revision to section 4.3 and to improve readability and clarity. |
| 43 | 4.3.3 | 25/06/20 | UK (MCA)  In section 4.3.3 (1089) it states "Navigational support may sometimes form part of an operational procedure. Such procedures should take into account the capability of the participants and should be formally documented and appropriately promulgated” - does the document need to clarify a generic procedure for navigational support so that all VTS stations worldwide have the same procedures and vessels using the support are aware of the procedure. Having a generic procedure or method would simplify training. | **Response (21/07/20)**  The guideline is intended to be at high level. Procedural navigational support is, by definition, dependent on many interrelated local issues such as national, cultural, geographical, and local certification standards. A prescriptive one-size-fits-all solution would not be appropriate.  See also comment and action above for comments Ref Nos: 34-42 above.  The text in section 4.3.3 has been revised to continue the linkage to the revised paragraph 4.3 and also incorporates the textual amendments proposed elsewhere.  **Action:** Included as part of review of sections 4.3, 4.3.1, 4.3.2 and 4.3.3 **(see above)** |
| 44 | 4.3.4 | 1/07/20 | NI (Jillian Carson-Jackson)  Amend title to read “*COMMENCING AND CONCLUDING NAVIGATIONAL SUPPORT*”  Delete “.*.the conclusion of direct navigational support is clearly identified*.” and replace with “*all parties are clear as to the commencement and conclusion of the specific activities for the support*.” | **Response (21/07/20)**  The entire section 4.3 has been revised to improve readability and clarity including the deletion of section 4.3.4 and the transfer of the appropriate text into this section. -  **Action:** Included as part of review of sections 4.3, 4.3.1, 4.3.2 and 4.3.3 **(see above)** |

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| 45 | 4.3.5 | 1/07/20 | NI (Jillian Carson-Jackson)  Amend introductory text before the table to read: “*Some examples of situations where navigational support may be required, and the proposed procedure to follow, include*:” | **Response (21/07/20)**  Need to amend introductory text agreed but reference to “procedures” has the potential to confuse with the guideline on Operational Procedures and is not considered appropriate.  **Action:** Amend introductory sentence to read: “Examples of navigational support when responding to developing unsafe situations include:” |
| 46 | 4.3.5 | 25/06/20 | UK (MCA)  Table 3 Section 2 – I think this is an excellent reminder how terminology is important when providing navigational support (sloppy use of the word course) and reminds us to specifically stay with Course to Make Good and Speed Over the Ground. Both of these terms are mentioned in the new section 4.3.5 Examples. [The rationale for my comment is that training organisations tend to interpret things differently across the globe and the tables / definitions are more likely to reduce these variations in interpretation whereas, I believe ‘Examples’ will not encourage more harmonisation between countries]. | **Response (21/07/20)**  There are occasions when course and speed may be used in a generic sense and others when the detail should be used. It not intended to capture this level of detail in this document. However, it would be appropriate to include the types of course and speed in the new G1132 as part of the agreed phraseology  **Action**:  1. Delete “..made good” and “..over the ground” after “course” and “speed” respectively.  2. Include in covering input paper for types of “Course” and speed to be addressed in Task 1.3.1 - Develop a Guideline on VTS Voice Communications, Phrases / Phraseology. |
| 47 | 5 | 24.6/20 | VisSim (Peter Eade)  Under Other Considerations (section 5) perhaps a new subsection relating to Just in Time arrival could be added. | **Response (21/07/20)**  This proposed addition does not align with the intent of this section. It is considered that the additional bullet in section 4.1 adequately addresses this consideration.  **No action intended.** |

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| 48 | 5 | 1/07/20 | NI (Jillian Carson-Jackson)  Introductory paragraph – delete “*there are instances where..*” and replace with “*in addition to being established in response to SOLAS Chapter 5, Regulation 12*:” | **Response (21/07/20)**  On further review, It is felt that the reference to SOLAS Reg. V/12 in section 5.2 would form a better overarching introduction to section 5 and should be moved to the beginning of section 5. With this amendments, the deletion of “there are instances where..” is agreed but the insertion of the additional reference to SOLAS is no longer needed. “..beyond territorial seas:” Should be added to the end of the sentence.  It was further considered that section 5 should only address the two bulleted points and be entitled “VTS BEYOND TERRITORIAL SEAS”. Situations where ships not designated as participating ships may take part in a mandatory VTS and the text in section 5.3 should be addressed in a new section 6 entitled “OTHER CONSIDERATIONS” and the following sections renumbered.  **Actions:**  1. Amend title to “VTS BEYOND TERRITORIAL SEAS**”**  2.Move the SOLAS reference and quote from 5.2 to the beginning of section 5.  3. Delete “*there are instances where..*” and add “*beyond territorial seas*” to the end of the sentence.  4. Review the text in section 5.3 and move to form a new section 6 entitled “*OTHER CONSIDERATIONS*”.  5. Renumber the following sections. |
| 49 | 5 | 1/07/20 | NI (Jillian Carson-Jackson)  Second bullet – delete “Voluntary VTS” and replace with “On a voluntary basis” | **Response (21/07/20)**  Agreed but, for consistency, both bullets should use the words in the revised Resolution. The heading of section 5.2 should follow the same wording.  This comment also draws attention to the fact that mandatory participation has not been addressed previously in this document.  **Actions:**  **1.** Amend bullet to read “*On the basis of voluntary participation”* (also in section 5.2)  2. Add new text “*It follows, therefore, that VTS is mandatory under national law within the territorial seas*” to 3.1 setting out legal basis of mandatory participation within territorial seas. |

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| 50 | 5.1 | 1/07/20 | NI (Jillian Carson-Jackson)  After “..*set out in paragraphs 4.1 – 4.3*” delete “*above*” | **Response (21/07/20)**  Action / Response (xx/x/20)  Accepted.  It is also noted that the paragraph following the quote from the IMO Resolution merely repeats the quote using slightly different language and is, thus not required.  **Action:**  1. Delete “above”  2. Delete second paragraph of section 5.1 |
| 51 | 5.2 | 1/07/20 | NI (Jillian Carson-Jackson)  1. Simplify the 3rd paragraph by splitting the sentence into two parts ending the first sentence after *“..in which the VTS is located*.” And starting the next sentence with “*However, it is*..”  2. In the 3rd paragraph amend the “*it*” in *“..it will be underpinned*..” with “.. *the provision of the VTS*..”  3.In the 3rd paragraph, reverse the order of” *international*” and “*national*”  4. In the 4th paragraph, amend the last phrase so that it stands out as a stand-alone sentence to read: “*A voluntary VTS beyond territorial sea would normally be limited to the provision of information and advice*”. | **Response (21/07/20)**  Accepted but this section requires more radical simplification incorporating comments made as appropriate.  **Action:** Review and simplify the entire section 5.2 incorporating comments as appropriate. |
| 52 | 5.3  (now part of section 6) | 1/07/20 | NI (Jillian Carson-Jackson)  Simplify long sentence in 2nd paragraph by ending first sentence at “*participating ships.*” and starting next sentence with “*In addition, a ship that is not a ‘participating ship’ may request..”* | **Response (21/07/20)**  Agreed.  **Action: E**nd first sentence at “*participating ships*.” and starting next sentence with “*In addition, a ship that is not a ‘participating ship’ may request.*.” |
| 53 | 5.3  (now part of section 6) | 1/07/20 | NI (Jillian Carson-Jackson)  Comment on final paragraph of section 5.3 “I really got lost reading this sentence. I tried to separate it into shorter sentences, but I am still trying to confirm the core point that is trying to be made.”  Amendment proposed for 2nd sentence to read: “*In issuing information, advice or warnings, operators should be mindful of the fact that there may be ships present in the VTS Area that are not participating. These ships may be unaware of information or advice provided by the voluntary VTS to other, participating ships.*” | **Response (21/07/20)**  Agreed this paragraph is not clear but the proposed revision does not cover the intent of this paragraph. Action 48 to move this into a separate section and listing the “factors” in bullet form should make this more understandable.  **Action:** Review and restructuretext previously in section 5.3 in forming a new section 6. |

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| 54 | 6  (now incorporated in section 3.2) | 1/07/20 | NI (Jillian Carson-Jackson)  1. Move first paragraph to the end of the section.  2. Open the next paragraph with “*All VTS communications should be clear and unambiguous.”*  3. After the two examples of “*Stop Engine” or “Hard to Starboard”* add “*or the provision of information relative to the ships bow such as “2 points on the port bow’* | **Response (21/07/20)**  On review, it was considered that this entire section with its sub-section did not fit logically into the overall structure of the document and that it would be better incorporated at this high-level in section 3.2. The content has been bulleted and restructured taking into consideration these comments (except the third proposal which seems a very unlikely example for a VTS Operator to even consider using and is not considered necessary).  **Action:**  1. Review, restructure and move sections 6 and 6.1 and incorporate in section 3.2. |
| 55 | 6.1  (now new section 3.2.1) | 1/07/20 | NI (Jillian Carson-Jackson)  1. Para 1 line 1 – delete “*frequently used*” replace by “*recommended for use*”  2. Para1 line 2 – end sentence at “*understood*”. New sentence to start “*Message markers can be particularly effective when*..”  3. Para 1 line 4. Start new para with “*Message markers precede.*.”. End first sentence at “*corresponding part of the message”.* Start new sentence with “*The message markers clarifies*”.  4. Para 2 line 1. Delete “*recommended a*s”. Insert “..*VTS always uses*..” after “..*best practice that..”*. Delete “*are used when a VTS communicates”* and replace with “*when communicating*”  5. Para 2 line 1/2. Delete “*It is strongly recommended that message markers are always used when a VTS Operator is*” and replace with “*The use of message markers becomes critical when”.*  6. Para 2 line 3. Delete “*irrespective of the language ability of the recipient;*” | **Response (21/07/20)**  All points agreed and should be included as part of the action above in moving section 6.1 and incorporating in section 3.2  **Action: I**nclude as part of the action above in moving section 6.1 and incorporating in section 3.2”. |

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| 56 | General | 25/06/20 | UK (MCA)  They [Draft A.857 update] now have Contracting Government, Competent Authority and VTS Provider, but you only need a VTS provider if you are going to have a VTS, who decides whether LPS or LPS? Not either of the first 2. | **Response (21/07/20)**  IMO is silent on LPS but IALA has attempted to set out guidance in Guideline G1142. Under SOLAS, Contracting Governments only have a responsibility “to arrange for the establishment of VTS where, in their opinion, the volume of traffic or the degree of risk justifies such services”. The only area where advice is offered to authorities is in the final para of section 1 of the LPS Guideline that “It is, therefore, considered best practice for Contracting Governments/Competent Authorities to ensure that a clear differentiation exists between VTS and local port services, and that this is clearly communicated to mariners”. As there is no basis for mandating LPS under SOLAS/IMO Resolutions, IALA cannot dictate who is responsible for authorising or dictating the setting up of an LPS. The IALA Guideline goes as far as it can in its guidance and it would be for the appropriate authority to implement it. In the UK, the MCA as national competent authority, amplifies LPS in MGN 401 so, presumably, under this MGN it could advise a port to do so as part of its compliancy or inspection regime. It is not intended that LPS be addressed in Guideline G1089 and LPS is not mentioned.  **No action intended.** |
| 57 | UK (MCA)  Would have liked the Illustrated Examples of Annex A to have been retained in some way, albeit that they would be necessarily retitled to represent ‘timely and relevant information’ (INS), ‘monitoring and management of ship traffic’ (TOS) and ‘navigational support’ (NAS) | **Response (21/07/20)**  One clear aim of this document was to ensure that any comparison with the existing “Types of Service” and the inference that they are somehow optional must be avoided at all costs. In the existing guideline, the annex was intended to cover the use of Message Markers but links it closely to Types of Service. It is also intended to retain this document as a high-level one. To avoid duplication, the current version of G1132, refers the reader to 1089 for detailed guidance on Message Markers. This needs to be rationalised and Guidance on Message Markers sits more appropriately in G1132 when it is expanded to cover phraseology.  **Action**: The need for Message Markers to be covered in G1132 should be identified in the covering input paper. |
| 58 | UK (MCA)  Would it be of benefit/is there a need to retain the checklist at Annex B of the current 1089 | **Response (21/07/20)**  The benefit of this checklist is agreed but it was considered that this Annex does not belong in G1089 and it would be more appropriate for it to be transferred to Guideline G1141 (ex-V-127) on Operational Procedures.  **Action**: Need for review and inclusion of the checklist in the update to G1141 to be identified in the input paper. |
| 59 |  | 16/08/20 | NI (Jillian Carson-Jackson)  “Definitions” section should be added as per the IALA Guideline template (using the recommended wording) | **Response (18/08/20)**  We deliberately decided to omit this. It was our considered opinion that a “Template” is provided to ensure commonality of presentation but that fields are optional and do not need to be included if there is nothing to enter under the relevant heading (unless, of course, specifically identified as mandatory).    It is considered that Dr Mike Hadley’s “suggested text” was offered as a logical introduction when definitions followed.  However, where no definitions are considered necessary, then the introductory text becomes redundant and unnecessary; in this case no definitions are required and, thus, the whole section can be omitted.  In the same way that no section headed “FIGURES” has been included, it is not intended to include a section headed “DEFINITIONS”.  **No action intended.** |
| 60 |  | 16/08/20 | NI (Jillian Carson-Jackson)  There is no acronym list, as per the IALA template for guidelines. | **Response (18/08/20)**  As with the “Definitions” section, we deliberately left this section out.  It is considered that an acronym list is only necessary in a long document when acronyms are obscure or open to different interpretation and the reader may find it helpful to have a list to refer to. In this instance, all acronyms are spelt out on first use, the document is short and IMO, SMCP, SOLAS and VTS are all terms that a reader moving to this Guideline should be very familiar with. ITU was only used in the reference section and is no longer considered ot be a relevant reference and has been deleted. WWNWS is not repeated in the document after its one and only use.  In a more general context, the normal writing convention for introducing acronyms to spell out the title in full, capitalise it, add the acronym in parenthesis the first time and then use the acronym thereafter.  As it seems so unnecessary, it is deliberately intended not to include an acronym list. It will not be difficult, or controversial, to reinstate it if IALA Secretariat insist on its inclusion  However, this comment prompted a review of the document and identified some occasions where, having moved text around, this principle was not properly followed. It was also noted that there were inconsistencies over the use of the acronym for Vessel Traffic Service when used in the singular (VTS) and in the plural (VTSs) as adopted in the revised IMO Resolution. These have been corrected.  **Actions**:  1. Ensure acronyms are correctly introduced on first use.  2. Ensure the correct use of “VTS” and “VTSs” throughout the document. |
| 61 | General | 1/7/20 | SIMAC (Dorte Hansen)  I’ve been through the revision of Guideline 1089.  Right now I do not have any remarks to the guideline.  Actually, I think that the new version is very useful for a training institution. | **Response (21/07/20)**  Encouraging! |