Input paper: [[1]](#footnote-1) VTS57-7.2.1

Input paper for the following Committee(s): check as appropriate Purpose of paper:

**□** ARM **□** ENG **□** PAP **X** Input

**□** ENAV **X** VTS **□** Information

Agenda item [[2]](#footnote-2) 7.2

Technical Domain / Task Number 2 N/A

Author(s) / Submitter(s) China Maritime Safety Administration

**Experience sharing of China's acceptance of the VTS module in the audits of IMO member countries**

# 1 Summary

This document provides an overview of the preparatory work and on-site audit process based on China's acceptance of the mandatory IMO Member State Audit Scheme (IMSAS). It also highlights the primary concerns and methodologies of the IMO audit team regarding the VTS module and shares China's experiences.

## 1.1 Purpose of the document

This document aims to provide information and reference for other countries' VTS implementation and preparation for the IMO mandatory audit by presenting an overview of China's VTS implementation and the related efforts undertaken to prepare for the IMO mandatory audit, thereby supporting future revisions of the G1115.

**1.2 Related documents**

《INTERNATIONAL CONVENTION FOR THE SAFETY OF LIFE AT SEA, 1974》

《IMO INSTRUMENTS IMPLEMENTATION CODE》Resolution A.1070(28)

《GUIDELINES FOR VESSEL TRAFFIC SERVICES》Resolution A.1158(32)

《AUDITING AND ASSESSING VESSEL TRAFFIC SERVICES》R1013

《AUDITING AND ASSESSING A VTS》G1101

《PREPARING FOR AN IMO MEMBER STATE AUDIT SCHEME (IMSAS) ON VTS》G1115

# 2 Background

In 2006, the IMO started to implement a voluntary audit mechanism. From 2013, the IMO promoted the transition of the audit mechanism to a mandatory framework through multiple amendments to conventions, including SOLAS, MARPOL, STCW, LL, TONNAGE, and COLREG, ultimately completing the mandatory audit mechanism on January 1, 2016.

In 2009, China accepted the voluntary audit. From September 2 to 11, 2024, the IMO conducted its Member State audit on China. The audit team carried out a detailed review of China's VTS implementation, and the audit methods included document verification, interviews, and on-site inspections. During the audit, China’s performance in implementing instruments relating to VTS was recognized by the IMO audit team.

**3 PREPARATION FOR THE AUDIT**

3.1 In order to prepare for the audit, China has established a special coordination working group, which involves experts in various operational areas of implementation, and is responsible for issues such as gap analysis based on the provisions of the Government's obligations, checking the rectification of issues during the voluntary audit phase, preparing the report for the audit, filling out the pre-audit questionnaires, conducting internal audits or simulated audits, and collecting information on instruments implementation. The working group has designated personnel responsible for the preparation work in the field of VTS.

3.2 The preparatory work carried out in the field of VTS includes:

* drafting a report on VTS in accordance with the requirements of International Convention for the Safety of Life at Sea (SOLAS), the III Code and the provisions of the Government's obligations;
* presenting a comprehensive picture of VTS implementation to the audit team, including legislation, division of responsibilities, implementation, record-keeping, assessment and improvement, training of personnel and other related content;
* identifying VTS regulations and management documents according to IMO Resolution A.1158(32) and IALA Guideline G1115, compiling and collecting information about implementation of VTS instruments from national VTS centers, as well as preparing specific supporting records and documents for random presentation and review during the audit.

1. **ON-SITE AUDIT PROCESS**

**4.1 Introduction and inquiry**

Officials from the China Maritime Safety Administration (China MSA) introduced the overall compliance situation of VTS in China, including legal framework, division of responsibilities, implementation arrangements, records, evaluation and improvement.

The audit team conducted inquiries regarding various aspects of VTS, such as role definition of VTS at different levels of maritime institutions, VTS construction processes, operational management, training and evaluation. China MSA responded to each question in detail, including the following key points:

* All VTS centres were operated in accordance with IMO Resolution on Guidelines for Vessel Traffic Services and the Technical Framework (R-128) on the Operational and Technical Performance of VTS Systems, issued by the International Association of Marine Aids to Navigation and Lighthouse Authorities (IALA).
* The VTS centres implemented a Quality Management System (QMS) to oversee and enhance their operations.
* VTS operators were trained according to the IALA Model Course (IALA 103/1) for VTS Operator Training and the refresher course (IALA C0103/5) for in-service VTS operators. These trainings were conducted by institutions approved by China MSA and accredited by IALA. Additionally, the VTS centres regularly evaluated and enhanced their performance through annual audits conducted in line with their internal QMS.
* VTS centres performed detailed analyses of any accidents that occurred to identify potential areas for improvement.

Notably, the statement “The VTS centres implemented an internal Quality Management System to manage VTS operations” was identified by the audit team as a “positive development”.

**4.2 On-site verification**

The audit team conducted on-site verification at the duty office of Wusong VTS Centre, closely observing daily VTS operations, traffic conditions in the waters, and the functionality of the VTS system. The team also interviewed several VTS managers and duty supervisors.

**5 Relevant experience of audit ON vts in China**

**5.1 Self-inspection and simulated audit**

* Analyzing root causes and corrective measures for VTS-related audit findings provided in the comprehensive audit summary reports published by IMO.
* Conducting a gap analysis based on the SOLAS Convention and IMO Resolution A.1158 (32), and develop an audit preparation manual.
* Conducting multiple rounds of simulated audits in accordance with IALA *G1115 PREPARING FOR AN IMO MEMBER STATE AUDIT SCHEME (IMSAS) ON VTS.*

**5.2 Document preparations**

Scoping and listing all documents required by relevant conventions, rules, and standards of the International Maritime Organization, as well as corresponding domestic regulatory documents.

Establishing a database based on modules such as VTS legislation, VTS responsibilities, VTS construction, VTS equipment maintenance, VTS personnel training, VTS operation management, VTS evaluation and improvement, to facilitate verification of the audit team during the audit process.

**5.3 Coordinating with the audit team effectively**

The designated single point of contact (SPC) is familiar with the business and has good language skills for communication with the audit team. It is recommended to determine the audit schedule, develop detailed reception plans and manuals for the audit in advance.

**5.4 Audit process**

Matters to note during the audit process:

* Proactively explain and clarify any issues or potential misunderstandings discovered during the audit process to the auditors.
* A database for audit preparation is formed and operated by a specialized person, which can be accessed by the audit experts at the first time.
* Assigning a dedicated person to record the opinions and issues raised by the auditors, ensuring that all feedback can be accurately recorded, and providing a basis for subsequent audit reports and rectification work.

**6 Action requested of the Committee**

* The Committee and Member States are requested to consider the content of this proposal, noting that the first round of the IMO Member State Audit Scheme (IMSAS) is drawing to a close, and the audit procedures, framework, and documents such as the Auditor's Manual are to be revised. It is recommended that appropriate actions be taken to address VTS-related findings identified during the first round of audits, and to learn experience accumulated by Member States. Such actions may include, but are not limited to, evaluating and revising the Guideline G1115 to better guide contracting governments and competent authorities in preparing for VTS audit.

1. Input document number, to be assigned by the Committee Secretary [↑](#footnote-ref-1)
2. Leave open if uncertain [↑](#footnote-ref-2)