

INTERNATIONAL HARBOUR MASTERS ASSOCIATION
EXPECTATIONS AND BEST PRACTICES OF VTS

Good afternoon ladies and gentlemen. I am Barry Goldman and have been asked to open this session of the seminar. I speak both as a mariner - as a specialist in navigation, warship pilotage and experience in command - and as a VTS practitioner. After retiring from military service, I managed London VTS for a period of ten years. This was then the UK's second busiest port by tonnage throughput and certainly had the largest and most complex VTS in the UK. It was hugely varied with ships of all shapes, sizes and cargos from large container vessels, LNG and tankers down to high-speed catamaran passenger vessels in central London and leisure and pleasure vessels in the upper reaches of the tidal Thames. Throughout this period from 2001 to 2012, I represented IHMA on the IALA VTS committee and, for much of it, I chaired its Operations Working Group - my fingerprints are on many of the current IALA recommendations and guidelines in place today. After a final 2½ years before retirement as Harbourmaster and chief Coastguard for Jersey in the Channel Islands, I have continued as IHMA's representative on VTS matters. I hope this illustrates my credentials to open this part of the seminar.

The revision of Resolution A.857 (20) is arguably the most important issue currently under consideration by IALA. I was instrumental in pressing for inclusion of this work when chairing the Operations Working Group and have continued to be fully involved in this review. I hope that I will be able to say that I have seen these aspirations through to the successful release of an updated document - and today is part of that process.

The submission presented to MSC99 in May last year set out the key issues for review and these are the matters that must be addressed in the new version. I will expand on some of these in setting out my expectations and for best practice.

I'll address the last item in the MSC submission first. Yes - the current resolution has stood the test of time remarkably well considering it is now over 20 years old.... BUT... It was, however, devised when the other supporting guidance did not exist and reflects compromise to accommodate differing views – and even, dare I say it, suspicions of VTS expansionist aspirations from some quarters. However, time has moved on; detailed IALA guidance is now available and operational experience has given much clearer recognition and understanding of the role and goals of a VTS. Looking critically at the current resolution, it contains a lot of unnecessary detail and includes language that has been open to differing interpretations and, in places, is now even in conflict with current practice. As a document, it is far too long and detailed and is poorly set out with a jumble of ideas that are scattered around the document like confetti. We desperately need to rationalise and restructure the document to ensure that the message it sends out is clear and that it is limited to high level principles on which more detailed guidance can be developed in subordinate documentation. Those of us who

have been involved in the detailed drafting of the version presented to this seminar believe that we are on the right track to achieve this. Specifically, it addresses the following further issues identified in the submission to MSC99:

The roles of all authorities, from governments at the top to VTS providers and mariners at the operational end, need to be set out clearly and concisely in a single section and limited to high-level principles. The proposed draft achieves this.

The existing concept of Types of Service as discrete services for which provision is optional has been one of the most significant causes of misinterpretation, misunderstanding, and lack of international harmonisation. IALA Guideline 1089 was issued in 2012 in an attempt to clarify interpretation of Types of Service within the constraints of the existing recommendation but, despite this, confusion remains. A Navigational Assistance Service continues to be incorrectly regarded as Shore Based Pilotage by many and a huge number of VTSs do not declare it. I have also found a number of self-styled VTSs managing and organising traffic yet only declaring an Information Service. The reason appears to be largely down to the word “Service” after each type leading to a fear of liability. I put it to you that, with the significant investment and running costs involved, a port or coastal administration would not invest in a VTS if it did not expect it to influence the behaviour of vessel traffic – this is, of course, a Traffic Organisation Service in today’s parlance. Furthermore, would an authority expect their VTS Operators, seeing a vessel standing into danger or being asked by a vessel for assistance in its navigation, to stay silent because a Navigational Assistance Service is not declared? Of course not. Misunderstanding and mis-declaration is rife and it is just not fair on our operators. I have even been told by one VTS Authority that it does indeed do all three services, but it does them all through the provision of information only and thus only declares an Information Service – and another that it only declares an Information Service as its equipment is not good enough – need I say more?! Such responses totally miss the point.

The three types of service end up by dressing up the concept and principles of VTS as something much more complicated than it really is. We need to look at VTS provision from the mariner’s viewpoint. The Mariner is faced with a huge number of references to prepare for a port entry – and don’t I know it! I would suggest that the subtleties of the types of service are unnecessarily complex and the declaration of the provision of specific types of service buried in documents such as the Admiralty List of Radio Signals will probably not even have registered in the Master’s or Navigator’s mind. Having established the port has a VTS, I submit that the Master might reasonably expect that, if there is a VTS, it will provide **all** of the following:

- Firstly, basic factual information relating to his arrival;
- Next, that such matters as the ship’s movements through the approach channel, the embarkation of a pilot, and that the passage into port will be deconflicted with other vessels - in short that the ship’s entry into port will be managed and organised;

- And finally, that should, say, the ship start heading towards the wrong pilot station or towards a navigational danger or shallow water, the VTS would warn and advise. The idea that a VTS can pick and choose between these, is quite misleading.

In short, the master should reasonably expect all three Types of Service and why should he/she think otherwise? Confusingly, the current resolution even goes on to suggest that a Coastal VTS is different to a port VTS and would normally only provide information. This is clearly absurd as the same principles apply and the Master's expectations should be no different. The three current "Types of Service" are all functions of any VTS and, if by risk assessment it is considered that the only mitigation measure required is the provision of information, then there is only a need for a Local Port Service – a concept that IALA has recently helped to further clarify with the issue of Guideline G1142. We need to bin the concept of optional Types of Service. Either it's a VTS or its not a VTS.

The next issue is the reference in the existing Resolution to "result-oriented". I can't think of any other term in the current resolution that has been quoted so widely and interpreted so differently, by those seeking to justify their own particular ends - nor one that has caused so much confusion to VTS Operators and trainers alike. We need a mindset change that sets a high-level requirement in the resolution for clear and unambiguous procedures and to leave the development of these in subordinate documentation that is more closely aligned to the much better communication practices of the air-world; this is work that is already in hand with the IALA VTS Committee. Hopefully, this might also spur IMO to update SMCP, which has little to commend it. The inclusion of vague terms like result-oriented need to be removed to prevent confusion such as this and is a direct result of the current Resolution dabbling in the "How" when it should confine itself to the "What". The "How" is for subordinate documentation.

Turning to the topic of changing tradition boundaries, whilst SOLAS Ch 5 Regulation 12 clearly states that the use of VTS may only be made mandatory in sea areas within the territorial seas of a coastal State, the current Resolution is silent on this subject. In response to ongoing uncertainty on this issue, IALA issued Guideline 1071 in 2009, which identified that a VTS beyond territorial seas can be achieved under current regulations through the establishment of either the voluntary use of VTS or a VTS that is part of, and in support of, a Ship Reporting or a Ship Routing System. As part of the review of the Resolution, IALA has considered this further, specifically with reference to the possibility of drawing on UNCLOS provisions for contiguous zones and the right of hot-pursuit. Legal advice is that UNCLOS does not in any way change or influence the statement in SOLAS. In practice, the existing advice provided by IALA in Guideline 1071 seems to be entirely adequate and there is not considered to be any need for any fundamental changes that might result in the establishment of a VTS for purposes other than those for which provision is already made. All that is needed is to ensure that this principle is identified appropriately in the new resolution. This debate also extends into whether we need to address future developments such as MAAS. To avoid the same failings of excessive detail as in the current Resolution, the principle that will best futureproof the document is to ensure that the language in the

Resolution does not exclude potential developments but yet avoids the inclusion of speculative detail. In short, the principle of keeping the document short and high-level would seem to best address this.

Since the issue of A.857(20), IALA has produced excellent documentation that now provides a solid bedrock on which detailed decision making on all aspects of VTS including such key issues as establishment of a VTS, procurement and training can now be based. The existing Resolution only makes passing references to the IALA VTS Manual and there is a need to give much greater focus on IALA documentation and to give prominence to the key role IALA now plays in setting VTS standards. This needs to be identified and reflected in the revised Resolution to ensure that IALA's role is underpinned by the Resolution; this forms a stand-alone section of the proposed draft.

Nowhere could this be more relevant than in the area of training. The current document is 22 pages long of which 2 pages are devoted to the standard introductory rehearsals. Of the remaining 20 pages only 8 set out the basic principles of VTS, whilst the remaining 12 pages are devoted to recruitment, qualifications and training of VTS Operators in significant detail and of which much is now out of date. Since A.857(20) was issued, IALA has provided detailed and much enhanced guidance on all aspects of recruitment, qualifications, accreditation, certification and training and the detail in the current Resolution is now superfluous and in places now inaccurate. Replacement of the entire Annex 2 with a short hook referencing and formalising IALA standards relating to training in the main part of the revised document will allow the existing document to be cut by more than half.

The current draft is only 7 pages including the initial 2-page rehearsal. If the document addresses high-level policy only and the temptation of adding unnecessary detail is avoided, we should have a much improved and focussed document that will remove all the current shortcomings and form a robust basis to take VTS forward into the future.