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| From: VTS Committee | VTS52-X.X.X |
| To: ARM Committee  Policy Advisory Panel | x April 2022 |

LIAISON NOTE

Revised Guideline 1052 on Quality Management Systems for Aids to Navigation Service Delivery

# INTRODUCTION

The VTS Committee has noted the liaison note from ARM (VTS52-3.2.3) informing that the ARM Committee has revised Guideline 1052 on Quality Management Systems for Aids to Navigation Service Delivery to conform with changes in IMO resolutions and other developments.

The Committee has been requested to review and give necessary comments to the draft Guideline 1052. Furthermore, the Committee has been requested to consider if the guideline is comprehensive enough to cover all aspects of AtoN Services, or if it may be necessary to develop separate guidelines under Recommendation R1032 on Quality Management Systems for VTS or ENAV respectively.

# Comments

The VTS Committee has reviewed the draft revised Guideline 1052 as requested. In general the VTS Committee is of the opinion that further considerations should be made to ensure that the draft guideline reflects current international best practice for quality management. To foster that the guideline continues to assist authorities implementing quality processes in their operations, consideration should be given to:

1. Aligning the guideline with internationally recognised principles and processes associated with implementing effective quality management.
2. Referencing internationally recognised frameworks for quality management and using the guideline to focus authorities on specific elements they should consider when implementing quality processes into their operations.

In more detail the VTS Committee provides the following comments:

1. Current best practice on quality management focusses on the PLAN -> DO -> CHECK -> ACT (PDCA) cycle, which is a four-step model designed to operate at all levels and can be applied to all processes to carrying out change and be repeated for continuous improvement. The draft guideline does not reference the PDCA cycle.
2. The format and structure of the draft guideline are not conducive to assisting authorities demonstrate compliance with Recommendation 0132 as it does not align to principles and processes recognised internationally for quality management.
3. The draft guideline has repetitive text between the sections of developing, implementing and maintaining quality management.
4. The draft guideline is overly prescriptive on items to be documented in contrast to providing an organisation with the flexibility to determine the level of documented information necessary to control its own quality management.  For example, a ‘quality manual’ is no longer required in ISO9001:2015.
5. The draft guideline would benefit from recognising that an organisation may have implemented a QMS for their business needs, of which AtoN activities may comprise of only a small proportion of their overall business activities. This means the prescriptive nature of the draft guideline in its current form may need further consideration.
6. The latest ISO standard on quality management (ISO9001:2015) has a high focus on risk management. This is not reflected in the draft guideline.
7. This draft guideline commonly refers to Competent Authorities which may not always be the entity responsible for aids to navigation. This would appear contradictory to IALA Recommendation R0132 which recommends that “Authorities responsible for aids to navigation implement and maintain a Quality Management System”.

The VTS Committee has considered whether the draft revised Guideline 1052 is comprehensive enough to cover all aspects of AtoN Services, or if it may be necessary to develop a separate guideline for VTS under Recommendation R1032 on Quality Management Systems.

Recognising:

* Vessel Traffic Services and Aids to Navigation are covered by separate regulations in the 1974 SOLAS Convention, V/12 and V/13 respectively; and
* IMO Resolution A.1159(32), amongst other thing states that:

*“In complying with these Guidelines, Contracting Governments should take account of applicable IMO instruments and refer to relevant international guidance prepared and published by appropriate international organizations.” (Section 1.4)*

the VTS Committee is of the view that separate Guidelines for VTS and AtoN services should be prepared in association with *Recommendation R0132 – Quality Management Systems* to ensure both services adequately reflect their respective international obligations.

The development of a guideline on Quality Management System for VTS has already been proposed as a task to be commenced under the next work period of the VTS Committee.

The VTS Committee note that R0132 will need to be revised in the future to reflect the different international obligations and two associated guidelines when developed.

# ACTION REQUESTED

The Policy Advisor Panel and the ARM Committee are invited to note the comments provided by the VTS Committee on the draft Guideline 1052 and are further invited to note the VTS Committee’s proposal to prepare quality management guidance specifically related to VTS.