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| From: VTS Committee | ARM13-x.x.x  (VTS50-1.1.6) |
| To: ARM Committee | 31 March 2021 |

LIAISON NOTE

Draft Guideline on Ship Reporting from the Shore-based Perspective

# INTRODUCTION

The ARM Committee invited the VTS Committee to review and comment on the draft Guideline on Ship Reporting from a Shore-based Perspective (VTS50-3.2.7 + VTS50-3.2.7.1). The VTS Committee has considered the draft proposal as requested.

The following comments are offered:

1. There is no reference to an associated IALA Recommendation and/or IALA Standard.
2. The purpose of the document is not clearly evident. For example, is it to ’assist’ or is it to provide a standard framework for the automated electronic exchange of information, including processes and procedures.
3. The connection of the document to other “Services in the context of e-navigation” (MSs) than MS 8 - Vessel Shore Reporting is not clear although the content exemplifies several reporting requirements from other MSs.
4. The expected benefits referred to (Section 1) may be better communicated with a brief explanation as to how the guideline would achieve these.
5. The use of the terms ‘ship reporting’, ‘ship reporting systems’ and ‘ship reporting in general’ throughout the document should be reviewed with a view to clarifying in each case whether it is referring to IMO SRS’s or other reporting systems.
6. There is no definition of or explanation on what is meant by shore-based stakeholders except that some are being mentioned in the figures such as immigration, customs, security and VTS.
7. Chapter 2 could benefit from not repeating too much from the FAL Convention, also considering that the Convention is up for a decision on a revised version in June 2021.
8. The reporting obligations of masters described in Section 3.6.2 is misleading and not consistent with IMO resolutions and in many cases national law.
9. It is unclear whether there is a standard data structure/format for reports which could result in on-board applications not meeting shore requirements and/or shore applications receiving reports in a variable format.
10. Electronic exchange of information for clearance processes has only been mandatory under the FAL Convention for two years. The Convention also recommends using the Single Window concept. The VTS Committee is concerned that the proposed guideline is not aligned or harmonized with the FAL Convention.
11. The VTS Committee has noted IMO Circular Letter No.4391 *Call for Expressions of Interest to become a Pilot Country of the IMO-Singapore Single Window for Facilitation of Trade (SWiFT) Project,* where shore-based stakeholders may get assistance and support in developing a Maritime Single Window (MSW) system to meet the requirements of the FAL Convention and also facilitate interconnectivity between ports worldwide.

What differences are there between such a MSW-system and the proposed reporting system?

The VTS Committee still have some outstanding questions on the proposed guideline that may need to be addressed further. Therefore, the Committee suggests a meeting between the task group leader(s) preparing the draft and VTS Committee members, which may provide a mechanism to assist ARM consider the VTS Committees comments in finalizing the draft guideline. The nominated contact person for VTS Committee is Liu Wei, Wusong MSA (liuwei@shmsa.gov.cn).

# ACTION REQUESTED

The ARM Committee is requested to consider:

* the comments from the VTS Committee and take action as appropriate; and
* the suggestion regarding a meeting to clarify the comments above.