



		Nigel Smith Oarsman	<p>3 c) Is there a need to include “jack-up-barges” in the list since we will be having rather more here in future?  <b>We already specify ‘engineering barge’ in the definition. A jack-up is clearly just one type of engineering barge.</b></p> <p>3 i) delete extra space: “Designated Anchorage _ “  3 n) add closing bracket after: msc.119 (74)  3 x) v) add ‘and’ after “Area;”  3 mm) after “Specified Vessel” means, is there a need to have a) since there is no b)?  3 mm) iii) add ‘and/or’ “after 23C);”  (2) e) ii) add closing full stop  <b>Thank you for these editorial comments – Amendments made.</b></p>
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2	<b>GD 4</b> USE OF VHF RADIO	<p>Thomas Southall VTS Supervisor – PLA</p> <p>Chris Livett Livett’s Launches Ltd</p> <p>Gus Lewis Royal Yachting Association</p> <p>Nigel Smith Oarsman</p> <p>Kevin East Canoe England</p>	<p>Perhaps a note encouraging vessels under oars to carry a mobile to call the VTS centre when going afloat or in the event of an emergency.  <b>Noted, but such advice is included in the PLA’s Recreational Users’ Guide.</b></p> <p>4(1) What about PLA registered workboats and safety boats? Should they not be included?  <b>Any such vessels over 13.7m will be required to carry VHF, but not those under 13.7m. A note has been added encouraging all vessels (small) to ensure they are able to communicate effectively with VTS/Coastguard, especially in the event of an emergency.</b></p> <p>This Direction refers to “recreational narrow boats” and “other leisure vessels” but neither of these expressions is defined. We therefore consider that the Directions should include a definition of “recreational narrow boat” and that the reference to “other leisure vessels” should be replaced by a reference to “other Pleasure Vessels” (as per the modified definition proposed in Direction 11 below.  <b>Agreed. The word ‘recreational’ has been removed. But we see no need to define ‘narrow boat’. Leisure vessel has been replaced with Pleasure Vessel.</b></p> <p>(1) b) iii) delete final semi-colon after “and”  (3) a) and c) is there a need to define to non-rowers what the “tideway” is?  (3) c) double space between “commencing _ navigation”  (5) Note: refers to GD 25. This should now read 27.  <b>Thank you for these editorial comments – Amendments made. ‘Tideway’ has been changed to ‘Thames’.</b></p> <p>The proposed change to exempt the requirement for vessels under oars to use and carry VHF is welcomed.  <b>Thank you.</b></p>
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3	<b>GD 6</b> MACHINERY AND EQUIPMENT	Tim Reardon Ports and Pilotage Issues Committee	6(4). An explanation of the reasons why it is deemed necessary for Masters to seek the consent of a pilot for ballasting etc would be appreciated; so too would an outline of how the PLA envisages such a consultation process working in practice.
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		Nigel Smith Oarsman	(1) "prepare Port Passage Plan" should have an 'a' before "Port" <b>Noted. Thank you.</b>
6	<b>GD 9</b> MARKING OF PASSENGER VESSELS	Derek Mann Thames Clippers  Nigel Smith Oarsman	Marking of sterns. Is this applicable to H.S.C, only there is no ref? <b>This Direction also applies to vessel operating under the High Speed Craft Code. The Direction has been amended accordingly.</b>  (1) c) add 'and' after "material;" <b>Noted. Thank you.</b>
7	<b>GD 10</b> DISPLAY OF RED LIGHT BY SPECIFIED VESSEL	Nigel Smith Oarsman	(2) a) add 'and' after "sunrise;" <b>Noted. Thank you.</b>
8	<b>GD 11</b> LOCAL NAVIGATION	Chris Livett Livett's Launches Ltd  Gus Lewis Royal Yachting Association	11(1) Please confirm that a Boatmaster's Licence with Local Knowledge Endorsements falls under the category "Certificated Person" <b>No – a BML with local knowledge endorsement is, in itself, insufficient to conduct local navigation. 'A 'Certificated Person' is defined, and as required by the Schedule to the General Directions, is a person holding an appropriate Local Navigaton Certificate.</b>  11(2) Please clarify the position when a yacht or vessel under 40m requests local navigation. <b>The Schedule to the General Directions provides full details of the Local Navigation Certificate regime.</b>  Direction 11 (Local Navigation) & associated Direction 3(1)(ee) (Definitions): "Pleasure Vessel". One of the principal purposes of this definition is to disapply to Pleasure Vessels the rules applicable to "Local Navigation".  As we commented in relation to the proposals for local knowledge endorsements under the draft Byelaws, we acknowledge the PLA's wish for large commercial vessels to have on board a Certified Person (essentially a licensed pilot, holder of a Pilotage Exemption Certificate or some other authorised person) and this intention does not of itself present us with any difficulties. Our concern is that the definition of "Pleasure Vessel" is such that the Direction would require a Certificated Person onboard certain recreational vessels and this would, in our view, be unduly onerous.  For example, if a family owned their own yacht and wished to conduct Local Navigation (which includes short movements between berths and the provision of onboard practical manoeuvring advice), the skipper would not need a Certified Person onboard. If the same family had instead bare-boat chartered the same yacht from a charter company (being chartered, the yacht does not fall within the definition of a Pleasure Vessel) then the skipper would need a Certified Person on board. We cannot see, however, how there would be any material difference in risk from the

		Ian Dunkley RNLI	<p>PLA's point of view but the requirement for the skipper to become a Certified Person or have such a person onboard would be prohibitive.</p> <p>Equally, it is arguable that the dinghies used by RYA sail training centres such as the Shadwell Basin Outdoor Activity Centre and the RIBs used by RYA powerboat training centres may fall outside the definitions of "Pleasure Vessel" and therefore be subject to having a Certified Person onboard – which would clearly be impractical.</p> <p>We therefore consider that the definition of "Pleasure Vessel" should include "any vessel certified (or deemed to be certificated) in accordance with the Merchant Shipping (Vessels in Commercial Use for Sport or Pleasure) Regulations 1998". In addition, Direction 11 should be expressly disappplied to Pleasure Vessels, recreational craft on bareboat charter and recreational craft used for training.</p> <p><b>Noted – As with the draft Thames Byelaws, and to ensure consistent definitions across PLA regulations, the definition of 'Pleasure Vessel' has been amended [ i) a) i) ] to include vessels chartered or hired. In our view, section ii) of the definition meets the point made about dinghies and training vessels.</b></p> <p>Is there a minimum size of vessel this relates to? The wording does not indicate so although I understand this relates to shifting pilotage and would assume it applies to vessels over 40m. <b>The requirements are quite detailed. Please refer to the The Schedule to the General Directions provides full details of the Local Navigation Certificate regime.</b></p>
9	<b>GD 13</b> REPORTING VESSEL MOVEMENTS IN THE THAMES	Chris Livett Livett's Launches Ltd  Nigel Smith Oarsman	<p>13(1) What about local vessels, 24 hours not always possible. Should there not be a caveat which excludes them? <b>Thank you. 13(10) has been amended.</b></p> <p>(3) is "call sign" not normally one word? <b>Noted – Amended.</b> (6) b) and (8) are examples of where throughout the document inward-bound and outward-bound are sometimes shown with a hyphen and sometimes without a hyphen. A search and replace needed to make them consistent. <b>Noted and a consistent approach implemented. Thank you.</b></p>
10	<b>GD 14</b> VESSEL TRAFFIC MANAGEMENT IN THE KNOCK JOHN CHANNEL	Barry Goldman VTSM – PLA	<p>Proposed further changes to Direction 14(2) - vis:</p> <p>Reporting Vessels navigating in the Knock John Channel between the Knock John No. 1 buoy and Knock John No. 4 buoy are subject to the following traffic management procedures:</p> <ul style="list-style-type: none"> <li>a) passing and overtaking <b>within the buoyed channel</b> may be permitted subject to the agreement of the Masters of the vessels involved except when an LNG vessel is involved. (See General Direction <b>25</b>), however;</li> <li>b) one-way traffic working will normally <b>be agreed between vessels or imposed by</b></li> </ul>



		<p>Don Cockrill Pilot – PLA</p> <p>Peter Flanagan Pilot – PLA</p> <p>Cathryn Spain Medway Ports</p>	<p><b>c) when one-way traffic working has been imposed, vessels navigating with the tide should normally have right of way; and</b></p> <p><b>d) LNG vessels are not permitted to navigate the Princes Channel.</b></p> <p>Reference to VTS veto of passing and overtaking. Presumably expert legal opinion has been taken on this as to the liability of the VTS operator versus the absolute responsibility of the Master in the event that as a result of the VTS veto action an incident occurs which can be attributed partly or totally to that intervention? The problem is that ship's masters do not in general understand the legal position of VTS and its structures and powers. Many Masters and OOWs regard VTS as an absolute authority to be heeded unquestionably. <b>Changes have been made to GD 15(3) – Please see above.</b></p> <p>When GD 25 is refererd to there is no restriction mentioned as regards LNG vessels in the Princes Channel. I have also been scanning through the new guide to VTS and it states that LNG are not permitted in the Princes Channel. <b>Changes have been made to GD 15(3) – Please see above.</b></p> <p>2) We feel that the final sentence should be removed. 'Out-bound vessels that are not constrained by their draught.....'</p> <p>Section 2 already requires out-bound vessels that are not constrained by draught to stay to the south when in the vicinity of traffic that is. When there is no other traffic in the area there is no need to direct vessels where to navigate.</p> <p>Section 3 – What size, draught, types of vessel? Over what area? Is this at VTS discretion? There could be commercial implications, as the Princes is a much larger area than Knock John, where similar restrictions apply. <b>The sentence regarding out-bound vessels has been retained. However, the option for vessels that are not constrained by their draught to the DW channel, to use it if the traffic situation allows has now been added. This should satisfy the first two points.</b></p> <p><b>With regard to the 15(3) comment, it is not considred that any benefit would be gained by proscribing specific limits and it is intended that this remains discretionary. As with the Knock John procedures, in practice this would follow discussions between pilots, with VTS being the final arbiter, should this be necessary.</b></p>
12	<b>GD 17</b> RESTRICTIONS ON TOWING AND PUSHING	Nigel Smith Oarsman	<p>(1) "distance of half a nautical mile" elsewhere is shown as '... of one half a nautical ...' – so some consistency perhaps required. <b>Noted and clarified.</b></p> <p>(3) a) delete final 's' from "of the towing vessels" <b>Noted – Amended</b></p>

13	<b>GD 18</b> PERSONS ON THE BRIDGE	<p>Don Cockrill Pilot – PLA</p> <p>Tim Reardon Ports and Pilotage Issues Committee</p> <p>Donald Chard London Shipowners' &amp; River Users Society</p> <p>Gus Lewis Royal Yachting Association</p>	<p>The section should be linked to page 11 Automatic steering and the helmsman requirements. In particular (2) suggest alternative wording " When a PEC holder.....a second person who is certified as being capable of taking charge of the vessel shall be present on the bridge at all times. This person may be used to fulfill the helmsman requirements of General Direction 7". <b>The suggested link to GD is regonised, but it is not deemed appropriate for the PLA to prescribe bridge team management.</b></p> <p>18(1). The draft revision may be construed as requiring a certificated Master to be present on the bridge at all times when the vessel is underway in the Thames. Such a requirement would not be acceptable to the Chamber; indeed, the Chamber sees no deficiency in the direction as written in 2006. The Chamber would wish to see a revised version of your current draft, free of any implication that a certificated Master should be on the bridge at all times, before giving its agreement to the new General Directions. <b>Noted – The reference in 18(1) to persons being 'certificated' has been removed.</b></p> <p>18(2). The draft revision of Direction 18(1) invited renewed attention to Direction 18(2). The Chamber is concerned that it may be construed as requiring both PEC-holders to be present on the bridge at all times. These concerns would be allayed most simply by the deletion of the word "immediately" or, perhaps, by an explanation of PLA's expectations in the event of the sudden and unforeseen incapacity of the PEC-holder who had conduct of the vessel. <b>Noted – The reference in 18(1) to persons being 'certificated' has been removed.</b></p> <p>The Society is in agreement with the views set out in the e-mail from the Chamber of Shipping dated 2 March. In addition, and further to the particular concerns raised about the implications of amended Direction 18(1), the new certification requirement would also be inconsistent with Pilotage Direction 12 where (as with the extant Direction) the requirement is for a crew member "competent to take charge of the vessel" to be available. <b>Noted – The reference in 18(1) to persons being 'certificated' has been removed.</b></p> <p>Many Pleasure Vessels do not have a "bridge" as such, so if it is intended that this Direction should apply to such vessels then we would suggest that this Direction be modified to take account of this. <b>We note your point, but remain of the view that mariners will recognise that 'bridge' means the normal conning position.</b></p>
14	<b>GD 19</b> EXCLUSION ZONES	<p>Chris Livett Livett's Launches Ltd</p> <p>Nigel Smith Oarsman</p>	<p>Might this be an opportunity to specifically list The Houses of Parliament as an Exclusion Zone. <b>It is not felt appropriate to include specific details of exclusion zones in General Directions, especially as the scope of such areas may well change with time. Full details of current Exclusion Zones are included in current Permanent Notices to Mariners 2008 – P12.</b></p> <p>add 'or' after "Harbourmaster;" <b>Noted – Amended</b></p>

15	<b>GD 22</b> REPORTING RESTRICTED VISIBILITY	Cathryn Spain Medway Ports	This may result in a number of ships having to report in after every broadcast, increasing radio chatter in fog. Replace 'shall' with 'should', 'or shall where practicable'. <b>Agree. 'shall' replaced with 'should'.</b>
16	<b>GD 23</b> NAVIGATION, WAITING AND ANCHORING	Tim Reardon Ports and Pilotage Issues Committee  Gus Lewis Royal Yachting Association	<p>23(3). In the light of the PLA's recent prohibition of anchoring in the vicinity of the Thanet Wind Farm, this Direction sharpens concern about the long-term availability of adequate anchorage facilities within the Thames Estuary and in areas to seaward. An assurance of the PLA's commitment to the provision of adequate anchorage facilities for all vessels, whether or not they intend to call into the Port of London, would be appreciated.</p> <p><b>The PLA is required by the Port Marine Safety Code to ensure appropriate anchorages are provided within its area of jurisdiction, and to review such provision on a regular basis. This it does. Adequate and appropriate anchorages outside port limits are primarily a matter for the MCA.</b></p> <p><b>The subject of the availability of anchorages in the area of the NE Spit and the specific issue of the prohibited anchoring area was discussed in detail at the UKSON meeting in May 2009. The expansion of the Tongue Deep Water anchorage forms part of the package, and the availability of alternative anchorages was carefully considered before this package of measures was approved by the MCA.</b></p> <p>We are unsure whether it is intended that this Direction should apply to Pleasure Vessels. While the Direction itself refers simply to "vessels", the provisions only seem relevant to large merchant vessels. We therefore believe that Direction 23 should be expressly disappplied to Pleasure Vessels (as defined in point 7 above).</p> <p><b>Direction 23(1) is intended to apply to all vessels, including Pleasure Vessels, which can and do on occasion, impede larger vessels restricted to the navigational channels and anchorages. There remains no case to exclude Pleasure Vessels from this requirement.</b></p> <p>If, on the other hand, it is intended that Direction 23 should apply to all vessels then we believe that the last sentence of Direction 23(1) is unduly onerous (as it would be impractical for sailing yachts to cross Black Deep at right angles and to navigate outside of the buoyed channel) and should not therefore be applied to Pleasure Vessels (as defined).</p> <p><b>Direction 23(1) already includes the provision of an exeption, with the express permission of the Harbourmaster. Our experience over many years is that there are no such difficulties in practice.</b></p> <p>In addition, if it is intended that Direction 23 should apply to all vessels, we are unsure as to the</p>

		Cathryn Spain Medway Ports	<p>intended purpose of the reference to “manoeuvring to or from a berth” in Direction 23(5) as it does not seem to be relevant to the requirement for vessels navigating at high-speed to keep to the starboard side of the Fairway. It is also unclear how this Direction is intended to apply to vessels that are not confined to navigating in the Fairway. We would therefore suggest that the Direction should make no reference to berthing and should allow high-speed craft that are not otherwise confined to the Fairway to navigate at speed outside it.</p> <p><b>This Direction is intended specifically to prevent vessels travelling at more than 12kts whilst crossing the Fairway to and from a berth, and until they are on the correct side of the River in order to proceed on passage. The reference to 20kts was included in error and has been replaced with 12kts.</b></p> <p>Section 5) As this only applies to vessels to and from berths on the Thames is this aimed at vessels whilst up-river or also in the Estuary?</p> <p><b>Direction 23(5) only applies to vessels manoeuvring to and from berths in the River.</b></p>
17	<b>GD 24</b> OVERTAKING MANOEUVRES	Nigel Smith Oarsman  Cathryn Spain Medway Ports	<p><i>Note 1. a)</i> refers to GD 25. This should now read 27 <i>Note 1. b)</i> refers to GD 23. This should now read 25 <b>Noted. Thank you.</b></p> <p>Section a) to refer to GD 27 and b) to refer to GD 25 <b>Noted. Thank you.</b></p>
18	<b>GD 25</b> SEPARATION WITH RESPECT TO SPECIFIED VESSELS AND PROCEDURES FOR VESSELS CARRYING LIQUIFIED NATURAL GAS	Nigel Smith Oarsman	<p>3) a) likewise, ‘... and one half a nautical ...’ <b>Noted. Thank you.</b></p>
19	<b>GD 26</b> VESSELS NAVIGATING BETWEEN SEA REACH NO.6 BUOY AND CROSSNESS	Nigel Smith Oarsman	<p>1) space required in “No.6” <b>Noted. Thank you.</b></p>



		<p>Robert Tapp Walton Bridge Cruiser Club</p> <p>Tim Reardon Ports and Pilotage Issues Committee</p> <p>Nigel Smith Oarsman</p>	<p>I wonder if this is the appropriate time to suggest that when VTS broadcast instructions under GD 34/35, requesting slow downs etc at named points, the location be additionally identified as a Longitude. We, as a club do not have particularly fast boats but wish to conform. Being infrequent users of the lower reaches below the Tower we generally have no clue when a location is named despite vainly searching the chart. I realise that the suggestion would be inappropriate for inclusion in General Directions, indeed I wonder if it is worthy of comment by you but at least I have got it of my chest! <b>Your point is noted. We aim to use common terminology in VTS broadcasts, rather than diverse and local terms and names.</b></p> <p>The introduction of a legal requirement for a vessel to comply with an instruction from a VTS centre gives rise to questions of how the VTS operator is to be held liable in the event of a grounding, collision or other incident that results from compliance with his instruction. Details of the procedures established by the PLA for such circumstances would be appreciated. <b>Any VTS Instruction will be prefixed with the message marker in accordance with IALA doctrine.</b></p> <p>This requires clarification. We are concerned that if every VTS order could be construed as a special direction, it may lead to dilution of the SD power. There are instances when VTS tell vessels what to do instead of advising them. Is this an instruction and therefore to be construed as a Special Direction?</p> <p>In order to avoid misunderstanding, correct message markers should be used and it should be made clear in the GDs that any VTS instruction will be pre-fixed with the word 'INSTRUCTION'. Could reference be made in the GD, as to the power behind the SD? <b>We are confident that the definition of VTS Instruction is clear and unambiguous.</b></p>
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25	<b>INTRODUCTION/ NOTES</b>	<p>Don Cockrill Pilot – PLA</p> <p>Nigel Smith Oarsman</p>	<p>Should read 2006. <b>Noted. Thank you</b></p> <p>At the end of the sentence, should “General Directions (2003)” not read 2006 as shown to have been amended on page 1? <b>Yes – Thank you – Amended.</b></p>
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24	<b>NO COMMENTS</b>	<p>Hamish Stewart RODMA</p>	
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