

CONSULTATION STATEMENT: C02-24: Updates to the General Directions for Navigation in the Port of London

This consultation ran from 08/08/2024 to 13/09/2024. The below statement has been provided to summarise the Port of London Authority's response.

Following a thorough consultation on the proposed changes to the General Directions for Navigation in the Port of London, feedback was received from various stakeholders, with general agreement but several key concerns raised. Below is a summary of the main points and the Port Authority's responses:

Qualifications for Thames Masters

Concerns were raised about the complexity of qualifications required for a Master on the Thames, including the need for an MCA Boatmaster Licence (BML) for Category C & D waters, a local endorsement, and the addition of Continuing Professional Development (CPD) points. It was felt that these requirements, compared to other UK inland waterways, create an increased burden, involving multiple regulatory bodies and higher costs.

PLA Response: The Local Knowledge Endorsement (LKE) is a Maritime and Coastguard Agency (MCA) requirement that applies in many UK ports. The CPD requirement was developed through consultation with local operators. No changes are proposed to the mandatory CPD requirement, as this is already in force; however, clarity on enrolment dates and changes to allocated points will be provided on the Thames CPD website.

Inconsistency in Terminology

Some stakeholders pointed out inconsistencies in the use of abbreviations like "hrs" versus "hours" and measurements such as "metres" and "m," calling for standardisation throughout the document.

PLA Response: Agreed to standardise these terms for consistency.

Bunkering and Fuel Definitions

Several respondents recommended clarification of the term "bunker" to refer specifically to its contents (cargo). They also suggested expanding the list of bunker cargo types to include liquefied hydrocarbon gases and other products, such as sewage, which are transported on the Thames.

PLA Response: The term "bunkers" is a standard ISO term, also used by the Royal Navy. These suggestions have been noted, but the definitions will remain unchanged. Expanding the list of cargo types will be considered in future revisions.

Spelling and Grammar

Stakeholders identified spelling issues, including the need to align with international standards such as using "organization" as per the International Maritime Organization's official spelling. Typographical errors in the draft were also noted.

PLA Response: Agreed to make the necessary corrections, including aligning the spelling and fixing typographical errors.

Clarification of Vessel Definitions

Suggestions were made to include drones (UAVs) under the definition of "aircraft" and to expand the definition of "tug" to cover vessels towing a barge.

PLA Response: UAVs have a separate definition and will not be included under "aircraft." The suggestion to expand the "tug" definition will be reviewed as it may cause issues elsewhere.

Speed Reduction and Wake/Wash Guidance

A respondent suggested more detailed guidance regarding speed reductions in areas with wake and wash restrictions. The concern was that the impact of wash varies depending on the section of the Thames and may need different enforcement measures in different locations.

PLA Response: The existing guidance in Byelaw 57 is considered sufficient. The General Directions include reasons for speed reductions beyond just wash. No further changes are proposed.

Bunkering and Safety Measures

A recommendation was made to strengthen safety protocols for bunker vessels by ensuring the Harbourmaster checks compliance, such as oil cargo endorsements and spill kit provisions.

PLA Response: The Harbourmaster already checks vessel compliance as per established procedures. These specific requirements are regulated under other guidelines and do not need to be listed in the General Directions.

Typographical and Structural Adjustments

Minor corrections were suggested, including sentence restructuring, formatting issues, and ensuring consistent use of capital letters for defined terms.

PLA Response: Agreed to make these corrections and adjustments to improve clarity and consistency across the document.

Vessel Navigation in Restricted Visibility

An inconsistency between sections 14.3 and 24.3 was noted regarding vessel movements in restricted visibility. It was suggested that the rules be aligned across the Thames for clarity.

PLA Response: This issue will be reviewed further to ensure consistency. No immediate changes will be made until this is reassessed.

Miscellaneous Feedback

Additional feedback included requests for improvements to definitions, such as for "pleasure vessels" and "high-speed craft," and some suggestions to restructure certain clauses for better clarity.

There was also feedback on a range of other General Directions where no changes have been proposed as part of this consultation.

PLA Response: Some of these suggestions have been accepted, such as adjustments to definitions. Other, more significant, changes will be considered for future revisions as needed, as the suggested changes have not been subject to consultation.

In conclusion, the consultation highlighted broad support for the proposed changes, but several areas will be refined to improve clarity, safety, and operational efficiency on the Thames. Feedback will continue to be reviewed, with some issues considered for future updates to the General Directions.

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