

# **87<sup>th</sup> Meeting of the Anglo-French Accident Technical Group (AFATG)**

Tuesday, 09 March 2021 at 09:00 UTC

## Venue

Microsoft Teams

### **Attendees:**

#### **Maritime and Coastguard Agency / Her Majesty's Coastguard**

Name	Head of International Liaison, HMCG (Secretariat)
Name	Secretary of State's Representative for Maritime Salvage and Intervention, MCA
Name	Assistant Director, Survey and Inspection (South), MCA
Name	Head of Counter Pollution and Salvage, HMCG
Duncan Ley	JRCC Manager, HMCG
Name	Staff Officer Specialist Operations, HMCG
Name	Staff Officer Vessel Traffic Management, HMCG

#### **Maritime Prefecture**

Name	Head of Division State Action at Sea (MMDN)
Name	Head of Coordination and International Cooperation (MMDN)
Name	Head of ORSEC (Crisis Management Organisation) (MMDN)
Name	Deputy Head of ORSEC (Crisis Management Organisation) (MMDN)
Name	Head of Assistance and Counter Pollution Office (ATLANT)
Name	Director, Gris-Nez MRCC
Name	VTS Manager, Gris-Nez MRCC
Name	Deputy Director, Jobourg MRCC
Name	VTS Manager, Jobourg MRCC

#### **Channel Islands**

Name	Harbour Master, Guernsey Harbours
Name	Assistant Harbour Master, Guernsey Harbours
Name	Coastguard / VTS Manager, Ports of Jersey
Name	Harbour Master, States of Alderney

#### **Ireland**

Name	Director, Irish Coast Guard
Name	Head of Operations, Irish Coast Guard
Name	Training Officer, Irish Coast Guard

#### **Apologies:**

Name	Head of Preparedness, Response and Planning, Irish Coast Guard
Name	Director (acting) MRCC Ostend

- Welcome and Introductions

The meeting was opened by the Head of International Liaison for Her Majesty's Coastguard, **Name**, **Name** welcoming all attendees to the virtual meeting. He conveyed the apologies of the Maritime Prefect for the Channel and North Sea Area and the Director of Her Majesty's Coastguard.

- Previous Minutes and Actions

No comments were received, and the minutes of the previous meeting were agreed.

- Action 1 - MCA / HM Coastguard to provide further details on framework in place regarding wind farm SAR assistance. Action closed following AFATG 86, email with further details and point of contact has been sent to **Name**
- Action 2 - **Name** to send updated Place of Refuge guidelines to **Name** for distribution. Action closed following AFATG 86, [SOP 006-2019 "Places of Refuge Decision-Making"](#) as well as a link to the full [National Maritime Oil & HNS Spill Contingency Plan \(NMOSCP\)](#) has been sent to AFATG members.
- Action 3 - **Name** and **Name** to arrange a separate meeting to discuss salvage plan / networking with P&I and industry. Regular meeting have been established providing a good basis for future cooperation on these issues. The group agreed to close this action.
- Action 4 - **Name** to inform the vessel operators involved and remind them on the importance of early notification of swims. Vessel operators have been informed and CROSS Jobourg confirmed the receipt of early notifications. The group agreed to close this action.
- Action 5 - **Name** to contact CROSS Jobourg per email regarding the incident and question raised (Channel 16 / DF). Discussion has taken place and resolved with a much better understanding regarding the procedures in place at CROSS Jobourg. The group agreed to close this action.

No actions remained outstanding from the previous meeting.

## Agenda Items

### 1. Accidents and Incidents since AFATG 86

- Update from the Maritime Prefecture for the North Sea and Channel Area

Although traffic has decreased over the last 6 months, there have been some accidents:

- Sinking of a Fishing Vessel west of the French EEZ in December 2020. No loss of life, but there are concerns about approximately eight tons of diesel fuel onboard. The vessel is still under water with salvage operations ongoing;
- Incident of voluntary pollution which has highlighted the inadequacy of CleanSeaNet images alone for taking legal action due to the high false alert rate. This is the first case in France in which the public prosecutor decided to open a criminal investigation on the basis of the infringement report drawn up on the CSN alert report. The vessel was not re-routed, French authorities requested a PSC at Rotterdam, the vessel next port of call, but an investigation onboard was only possible in France a few weeks later. The investigation showed some evidence confirming voluntary pollution;
- Migrant incidents remain common.

- **Name** stated that there were no specific incidents to be raised from the UK side, but there seems to be a general issue with the State having to get more involved than necessary due to a lack of cooperation between the parties (item will be raised under 'any other business').
- **Name** informed the group of an ongoing incident involving MV CEMI not under command Southeast of Ireland. The vessel has been drifting offshore and into the UK EEZ before being taken under tow to Waterford. Another recent incident involved a fishing vessel not under command in the UK EEZ that was subsequently towed to Dublin. These incidents highlight the issue of vessels crossing jurisdictions during salvage incidents.
- Following the updates, the question was raised by the Maritime Prefecture whether the UK still had access to EMSA systems, any impact following the UK leaving the European Union and what contingency the UK had put in place.

**Name** explained that the UK had lost all access to EMSA services including CleanSeaNet, SafeSeaNet, CECIS, IMS as well as to counter pollution vessels and EMSA equipment stockpiles with effect from 1 January 2021. Over the last 15-18 months, the UK has established the KSAT Earth Observation Service (EOS) in parallel with CleanSeaNet, and this has become the primary wide area sea surface surveillance capability since 1 Jan 21, providing basically the same service with the internal processes within the UK remaining unchanged. Mutual support arrangements through the Bonn agreement remain accessible and technically the UK can request third country assistance from the EU/EMSA as a 'third party state'. The MCA has already considered developing its own capability to mirror that provided by the EMSA oil spill response vessel but has not taken this forward as an immediate consequence of Brexit. The MCA's Commercial Directorate in house and the Department for Transport are considering the next steps. The loss of SafeSeaNet and CECIS access has made informing neighbouring countries more cumbersome as the notifications / information need to be sent individually via telephone / email rather than through the EU wide common reporting mechanisms.

- **Name** asked whether this has an impact on the WETREP process and how this is received by the UK.

**Action 1:** **Name** to refer to Navigation Safety (UKMS) and provide information on current WETREP procedures to **Name** / Irish Coast Guard

## 2. Environmental and Counter Pollution

- Drones in Counter Pollution (**Name** / **Name**)

**Name** and **Name** gave a presentation on EMSA RPAS trials regarding MARPOL Annex VI compliance in the Dover Strait. The presentation will be shared with the group alongside the minutes.

**Name** stated that he was aware of recent RPAS trials in the UK and asked whether the MCA could provide an update on these trials and provide appoint of contact.

**Action 2:** **Name** to liaise with the aviation team for an update on the UK RPAS trials and provide a point of contact.

Note: Contact details for the MCA point of contact (**Name** Aviation Innovation and Future Technology Lead) passed to **Name** / **Name** to provide requested information on the UK RPAS trials.

- UK procedures for bunkering at sea / windfarms (**Name**)

**Name** shared the procedures and processes regarding bunkering at sea and in the vicinity of windfarms within the UK's territorial waters and EEZ. In general, bunkering outside harbours and within the UK's territorial waters is prohibited. can be granted to ease problems with vessels operating inshore having to return to a port every time to transfer fuels, and usually apply to cable layers, cruise liners / moored accommodation vessels, heavy lift and jack- up vessels (when in jacked-up mode). Many of these exemptions are applied during the construction of windfarms. The MCA's Counter Pollution and Salvage branch is the controlling authority and operators must prove that they have trained personnel to carry out these operations, have appropriate procedures and response capabilities in place. The onus is placed on the transferring vessel, and the required response capabilities depend on the volume and type of fuel being transferred (usually marine diesel but in some instances Ultra Low Sulphur Fuels which can be persistent). Normally contingent response capability will be some degree of Tier 1 equipment, in addition to the vessels' SOPEP requirements (skimmer, boom, absorbents, and waste storage). Notification of fuel transfer operations is required 48 hours in advance, for infrequent operations. For very frequent operations a weekly program can be submitted and approved en-mass. Windfarms outside territorial waters may cause potential issues as transfers are not prohibited in international waters and response capabilities are optional. However, the MCA does direct that such operations within the UK EEZ must provide 48 hours' notice to MCA CPS – this allows for awareness the the potential for surveillance/monitoring. UK MCA has adopted international oil transfer guidelines for weather minima during fuel transfer operations. These are mandated restrictions within UK waters and operations may not commence or, if started, must cease when the swell/wave heights exceed 2 meters and wind speeds are 25 kts or more. Within international waters (within the UK EEZ) these weather minima are strongly recommended to all involved in ship-to-ship fuel transfers (both of oil cargoes and bunkers), with liaison with StS providers, operational experience and HMCG reporting indicating that these restrictions are adhered to in all locations.

**Name** added that Ireland has a permit process in place for transfers in the Irish EEZ or territorial waters and offered to share this with the group.

**Action 3:** **Name** and **Name** to share respective processes and guidelines with the Maritime Prefecture.

### 3. Search and Rescue

- No submissions were received under this agenda item.

### 4. Maritime Assistance Services

- Cruise ship moorings **Name** / **Name** / **Name**

**Name** stated that there are currently 24 cruise ships moored in the UK, 10 alongside and another 14 at anchor on the south coast. There have been several problems with anchor chains breaking, as cruise vessels are not designed or used to be at anchor for prolonged periods of time during winter in Northwest Europe. One specific issue that has been noted is the poor quality of anchor chains with one vessel experiencing three failures, resulting in the MCA sending formal notifications to cruise companies informing them of the issue and asking them to put in place / review their processes, procedures, and equipment (anchor / propulsion). In this instance, the loss of anchors seems to have been caused by the manufacturer using poor quality steel, as the weather conditions at the time were not severe. The losses are currently under investigation by the Flag State and class society. The UK is not expecting cruise companies to resume cruises until September 2021, with

some companies having already cancelled all cruises until then. It is likely that only one ship out of a fleet will operate, initially on coastal cruises around the UK without port visits. This will result in most vessels to stay at anchor, and as some vessels anchor very close to the coast, reaction times are short, compounded by the vessels trying to deal with any issues themselves first before contacting the MCA / HM Coastguard.

**Name** added that there had not been any incidents like this in France, but that there were strict procedures in place delegated to the MRCC (mostly CROSS Jobourg). To reduce the risk and avoid clusters of vessels, permissions are granted for short periods only following a risk assessment and are subject to continuous review. The main reason for anchoring is a shortfall of quay space in Le Havre and there is close cooperation with the harbour master to avoid negative impact on the economic situation. There have been no incidents so far, but the concern is that anchoring is usually taking place to take shelter in harsh weather conditions during the winter period.

**Name** added that Guernsey had made the decision not to open for cruise vessel port visits in 2021 (excluding transits and anchorage without shore visits), regardless of whether the season may start later this year. **Name** stated that Jersey was still working on its policy and framework but is equally unlikely to open for cruise ship visits (other than transits and anchoring) this year.

**Name** stated that an increase in shipping on the Irish East coast had resulted in full anchorages, with ships now anchoring along the coast causing congestion. The MRCC is using a geographical information system to automatically monitor vessels at anchor or not under command. Vessels are supposed to call / inform the MRCC, but often this does not happen. **Name** added that automated behaviour monitoring had been tested and used in the UK and is effective at alerting operators to non-reporting vessels. The difficulty is to balance the number of alerts with high-risk issues not to overload operators.

In general, the group agreed that encouraging the cruise industry to review mooring system was good and that proactive and regular reporting and communications were important.

**Action 4:** **Name** and **Name** to share procedures / processes with regards to anchorages / moorings with the group.

**Action 5:** **Name** / **Name** to discuss internally with HM Coastguard how to implement a monitoring and regular reporting process for moored vessels.

## 5. Maritime Safety

- CNIS statistics **Name** / **Name**  
**Name** provided an overview of the CNIS statistics between January and March 2021 and the final statistics for 2020. **Name** provided an overview of the impact of COVID19 on traffic, showing a 6% drop both in movements as well as tonnage.

The presentations will be shared with the group alongside the minutes.

## 6. Training and Exercises

- The Maritime Prefecture explained that the planning for exercises is challenging due to COVID19 restrictions. Passenger lines have dramatically drastically decreased service which makes it difficult to find exercise partners. The intention is to carry out an exercise involving the tow of a large cruise vessel, and the question was raised whether the UK has any experience with this.

**Name** stated that this had not been tried in the UK and was a gap in capability. The next opportunity to practice towing operations would be later in 2021 during large naval exercises where the Ministry of Defense might provide a tanker to practice with, but there are no plans to exercise the tow of a cruise vessel. **Name** added that he was also unaware of any exercises or incidents outside the UK where this has been practiced, other than the Viking Sky incident off Norway which only involved a medium size cruise vessel.

**Action 6:** **Name** to investigate on any planned international activities / exercises or experiences from past incidents regarding towing of large cruise vessels and share with the group.

- **Any Other Business**

**Name** informed the group that there had been several fairly routine incidents, such as engine failure requiring assistance, resulting in the requirement for considerable State interaction with the designated person ashore, insurers and agents, and asked whether there had been similar experiences in the group. These incidents seem to show a lack of internal cooperation and a segmentation of tasks by the individual parties rather than coordinated assistance.

**Name** stated that the owner and insurers are often based overseas and difficult to get hold of outside office hours and in differing time zones and agreed that individual parties are often working in isolation which requires more effort from the authorities.

- **Date and Time of next Meeting**

The dates of the next meeting (AFATG 88) in October / November 2021 will be discussed with the Maritime Prefect and the Director of HM Coastguard and shared with the group. **Name** renewed the UK's offer to host the next meeting if travel restrictions are no longer in place, but otherwise Teams has proven to be an effective way of continuing the meeting schedule. He thanked everyone for their participation in the meeting and discussions and closed the meeting.

Note: The date for AFATG 88 has been agreed between the Maritime Prefect and the Director of HM Coastguard as **Tuesday, 30 November 2021**. Further details will be sent out closer to the meeting.

- **Summary of Actions**

AFATG 87		Owner	Status
<b>Action 1</b>	<b>Name</b> to refer to Navigation Safety (UKMS) and provide information on current WETREP procedures to <b>Name</b> / Irish Coast Guard	<b>Name</b>	New
<b>Action 2</b>	<b>Name</b> to liaise with the aviation team for an update on the UK RPAS trials and provide a point of contact.	<b>Name</b>	Closed
<b>Action 3</b>	<b>Name</b> and <b>Name</b> to share respective processes and guidelines with the Maritime Prefecture.	<b>Name</b> <b>Name</b>	New

<b>Action 4</b>	<b>Name</b> and <b>Name</b> <b>Name</b> to share procedures / processes with regards to anchorages / moorings with the group.	<b>Name</b> <b>Name</b>	New
<b>Action 5</b>	<b>Name</b> / <b>Name</b> to discuss internally with HM Coastguard how to implement a monitoring and regular reporting process for moored vessels.	<b>Name</b> <b>Name</b>	New
<b>Action 6</b>	<b>Name</b> to investigate on any planned international activities / exercises or experiences from past incidents regarding towing of large cruise vessels and share with the group.	<b>Name</b>	New



**MINISTÈRE  
DE LA MER**

*Liberté  
Égalité  
Fraternité*



# **EMSA RPAS EXPERIMENTATION REGARDING MARPOL ANNEX VI COMPLIANCE IN THE DOVER STRAIT**

Feedback at 87th AFATG

Name

– CROSS Gris Nez

Name

– CROSS Jobourg

From October to December 2020, deployment of a RPAS made available by **EMSA** to the **Ministry of the Sea**

Purpose : assess the level of compliance by the vessels of MARPOL Annex VI in the Dover Strait through a sniffer loaded on the RPAS

Reminder : Project presented at AFATG # 84 in 2019

Complexity because of the various authorisations to be granted ( permit to fly, radio frequencies, airspace) → achieved in 2020, in spite of the hurdles triggered by the sanitary situation

Main stakeholder : **Directorate for Maritime Affairs**

CROSS Gris-Nez acting as deployment base

CROSS Jobourg acting as service in charge of the follow-up actions to be given to measurements, in relation with PSC authorities

# 1. Operational and logistical execution



## LOGISTICS AND STAFF

- Installation and removal processes undertaken by CROSS Gris-Nez technicians and the private company contractualised by EMSA.
  - 1 Ground control station
  - 2 additional containers for storage of devices and RPAS
  - 1 workshop (hosted in CROSS Gris-Nez garage)
  - 1 computer in the maritime ops room of CROSS allowing to monitor the aircraft live course, chat with the pilot and other stakeholders (EMSA, Jobourg, lab for analysis), access live images, follow measurements
- Staff involved in the operations
  - CROSS liaison officer : command and control, targetting of the vessels, coordination between RPAS flights and CROSS activity
  - CROSS SAR and VTS staff : CNIS, provide liaison officer with any information, instructions in case of SAR/MAS events
  - Operator's team (5 persons continuously, approx. 15 altogether in order to switch teams) : piloting, operating the payload, maintenance

## MAJOR FEEDBACK ON OPERATIONS

- Multiple hurdles to good quality Sox measurements
  - wind direction and force for vessels proceeding in the NE lane :
    - mostly SW wind in the area, pushing the smoke plume over the vessel
    - strong winds not allowing the RPAS to fly in safe conditions (> 25 kts)



→ safety constraints triggering minimal distance from the vessel and altitude to be respected by the RPAS

Results: only 39 % of the planned flight hours achieved BUT satisfying results (see after)

- Decisive asset for SAR or MAS events
  - live command and control + live video stream in the maritime ops room of CROSS considered as essential



## 1.2. Feedback on the results

# Operational assessment

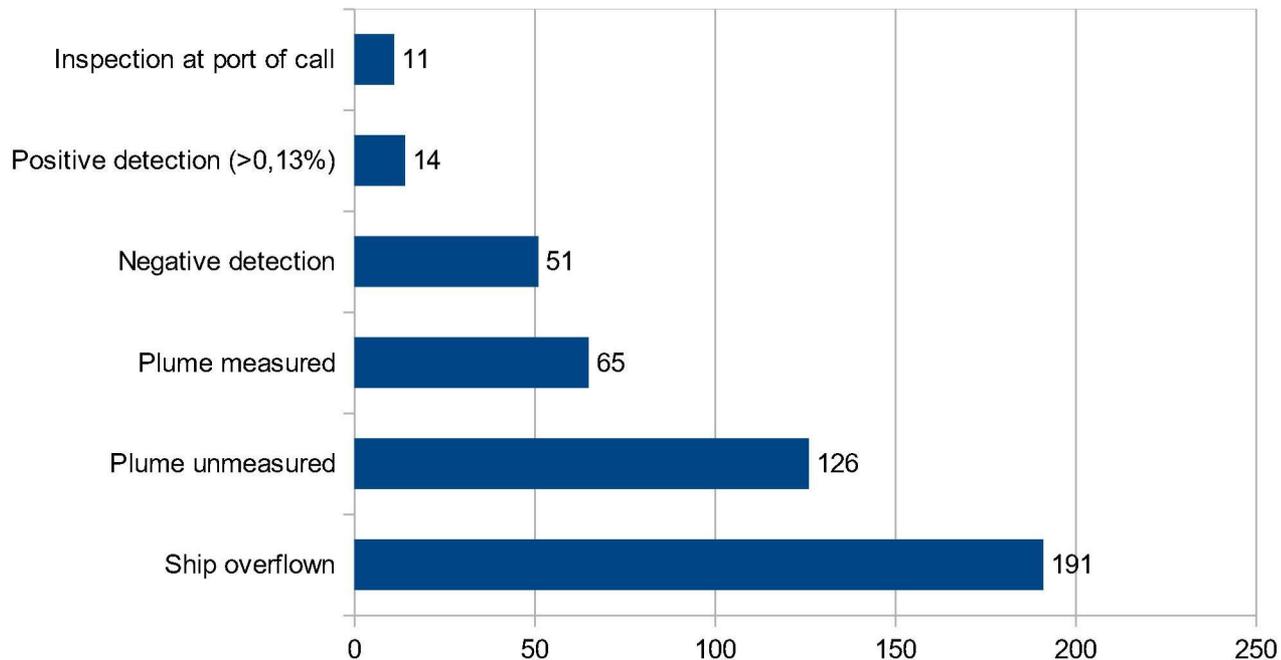
The RPAS flights conducted during the deployment led to the following analysis :

Most of the ships are complying with the SECA rules.

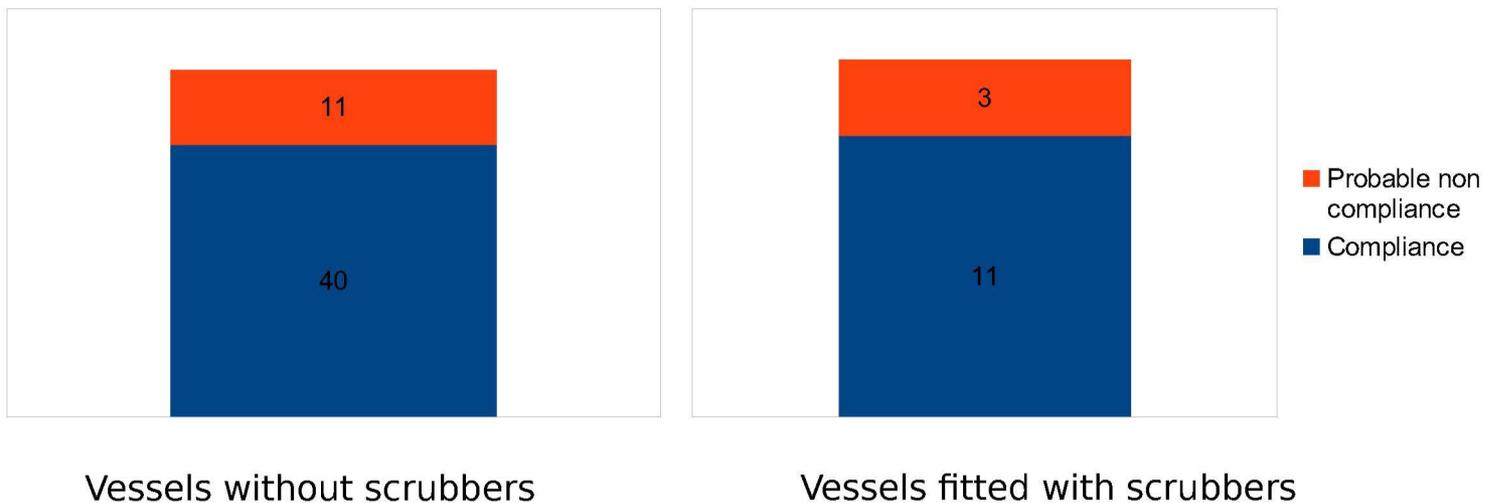
Among the 17 vessels detected with a fuel sulfur content above 0,10 %, 14 were overpassing the 0,13 % threshold.

CROSS Jobourg sent pollution report to port of call authorities and verified/set THETIS-EU alarms.

11 inspections at port were carried out.



# Use of scrubbers by controlled vessels



# Confidence in the measurements

As we have seen, 14 vessels have been measured with a FSC  $>0,13$  %. All of these measures were made with a confidence score  $>6$ , largely above the threshold set to 3.

The 11 samples gave us an interesting information about compliance :  
The RPAS measurements are, in average, **the double** of the sample results.

# Actions taken following inspections at port

3 of the samples indicated a FSC above 0,10 %, but only 2 cases were transferred to the flag State.

In addition to this Port state control cooperation, the solution to enforce MARPOL annex VI in the SECA **is to carry out control at sea**, with fuel sampling.

# Way of improvement

- 1/ Organize the deployment during a better weather season
- 2/ Improve the targeting procedure to maximize the flight time and avoid uncessussful measurement attemps
- 3/ Choose a deployment site closer to the SECA entrance, to be able to re-route ships to French ports if necessary
- 4/ Capitalise on the UAV's capabilities to use it in multi-mission framework (SAR, MAS, etc.)
- 5/ Experiment controls at sea

# Next steps

- 1/ During Summer 2021 : new deployment from Gris-Nez MRCC location
- 2/ During Fall 2021 : deployment from Jobourg MRCC location
- 3/ Increase in performance of SO<sub>x</sub> air pollution
- 4/ Development of NO<sub>x</sub> air pollution surveillance competency at Jobourg MRCC



Maritime &  
Coastguard  
Agency



# HM Coastguard

## Dover Strait Statistics 2021

*(Jan – March 21)*

*87th AFATG, 9th March 2021*

Name

HMCG Staff Officer Vessel Traffic Management

Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Vessel Activities Summary

01/01/2021 – 08/03/2021

- Ship Reports Received 9696
- Rogues 1
- Non-Reporters 1
- Deep Draft 31
- Tug and Tow SW Lane 23
- Defect Reports 10
- Unorthodox Transits 0
- Navy Transits 21



HM Coastguard

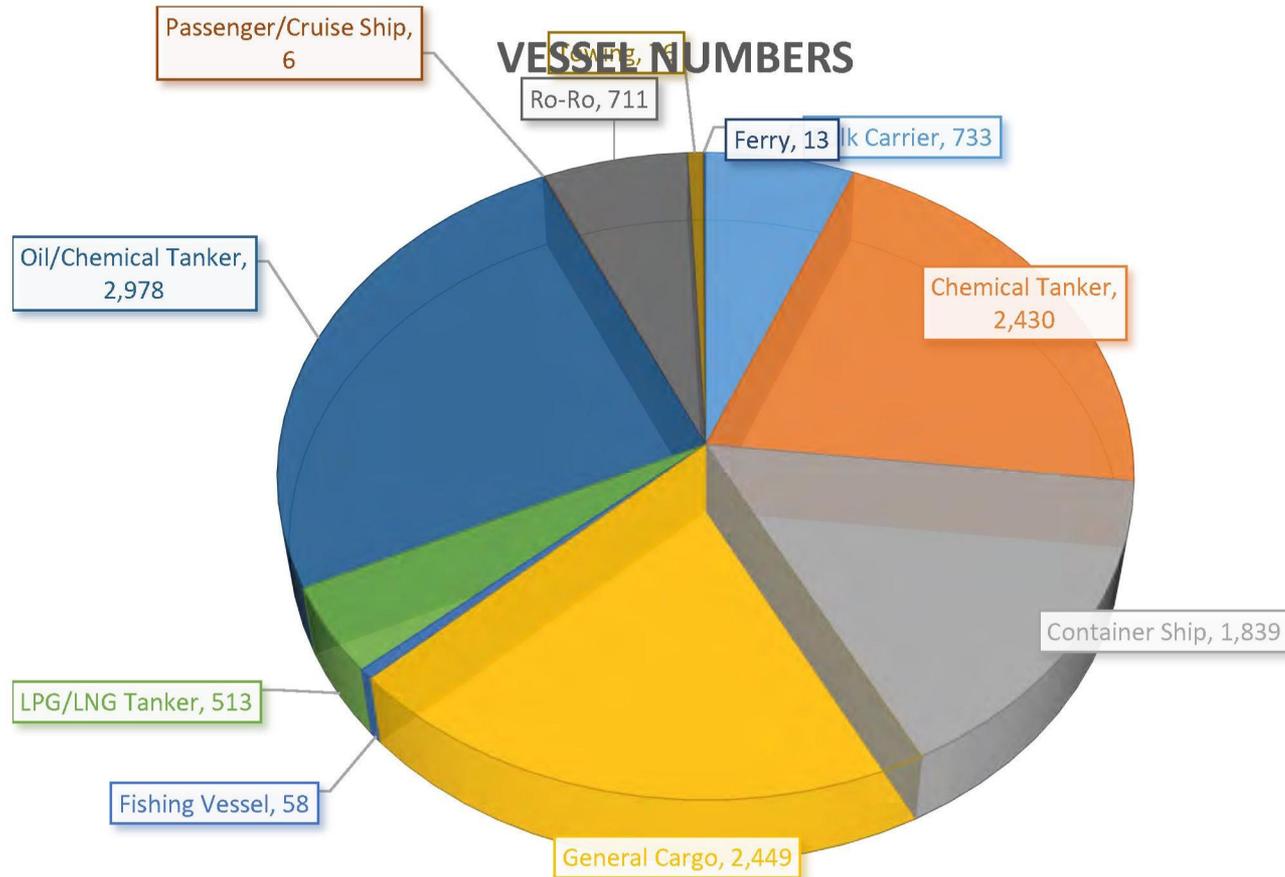
Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Vessel Numbers Summary

01/01/2020 – 08/03/2020



HM Coastguard

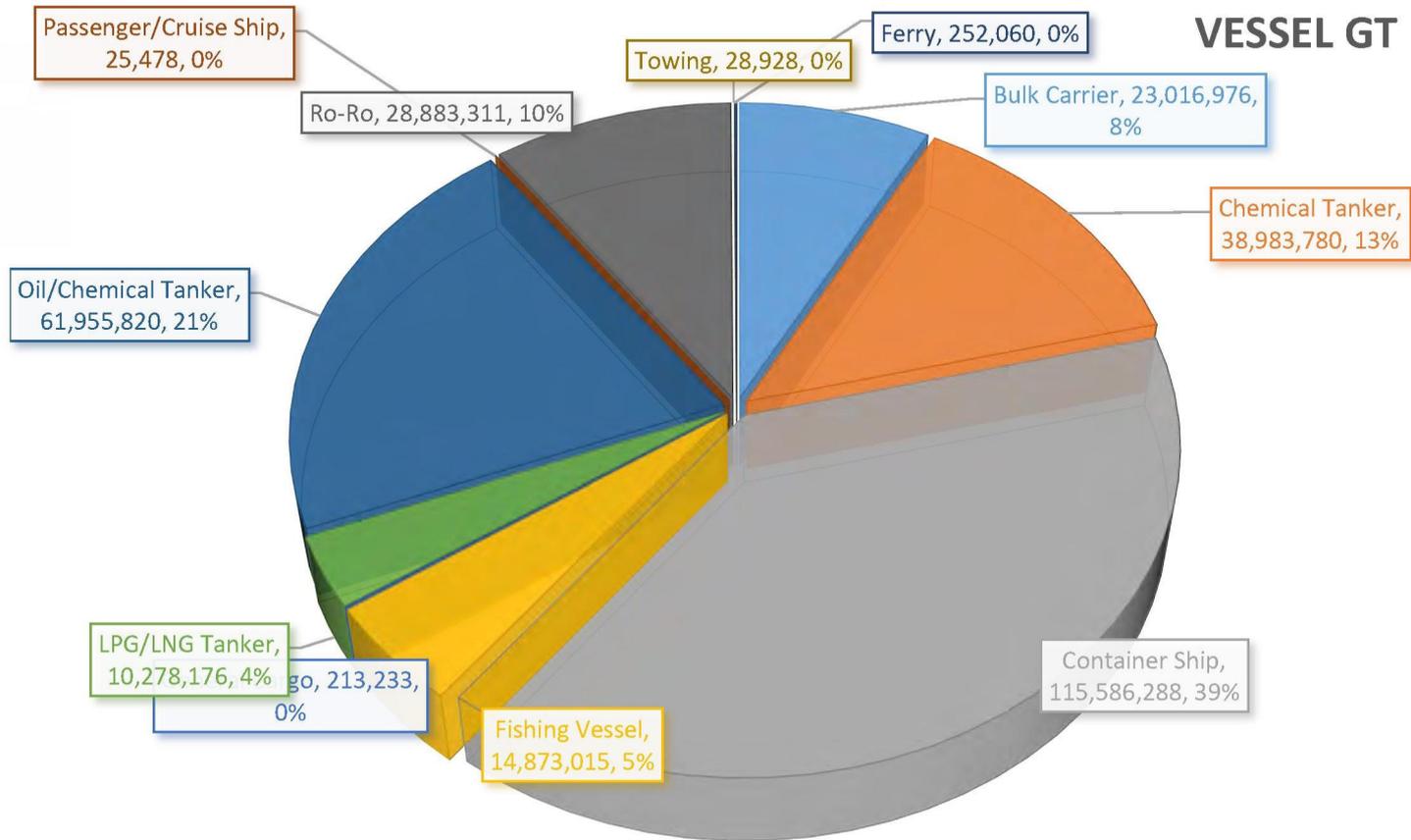
Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Vessel Tonnages Summary

01/01/2021 – 08/03/2021



HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# ColRegs

## Jan – March 2021

Month	HAZREPS	Zombies	Rogues
Jan	1 (Singapore)	0	1 (UK EITZ)
Feb	0	0	0
March	0...	1 (Marshall Islands)	0



HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency



# HM Coastguard

## **CNIS & SUNK Statistics 2020**

*January to December 2020*

Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Vessel Activities Summary

01/01/2020 – 31/12/2020

Report	Dover Strait
Ship Report	44577
Rogue	27
Non-Reporters	13
DEFREP	30
Hampered by Draft	100
Tug and Tow	161
Unorthodox	178
Naval	86



HM Coastguard

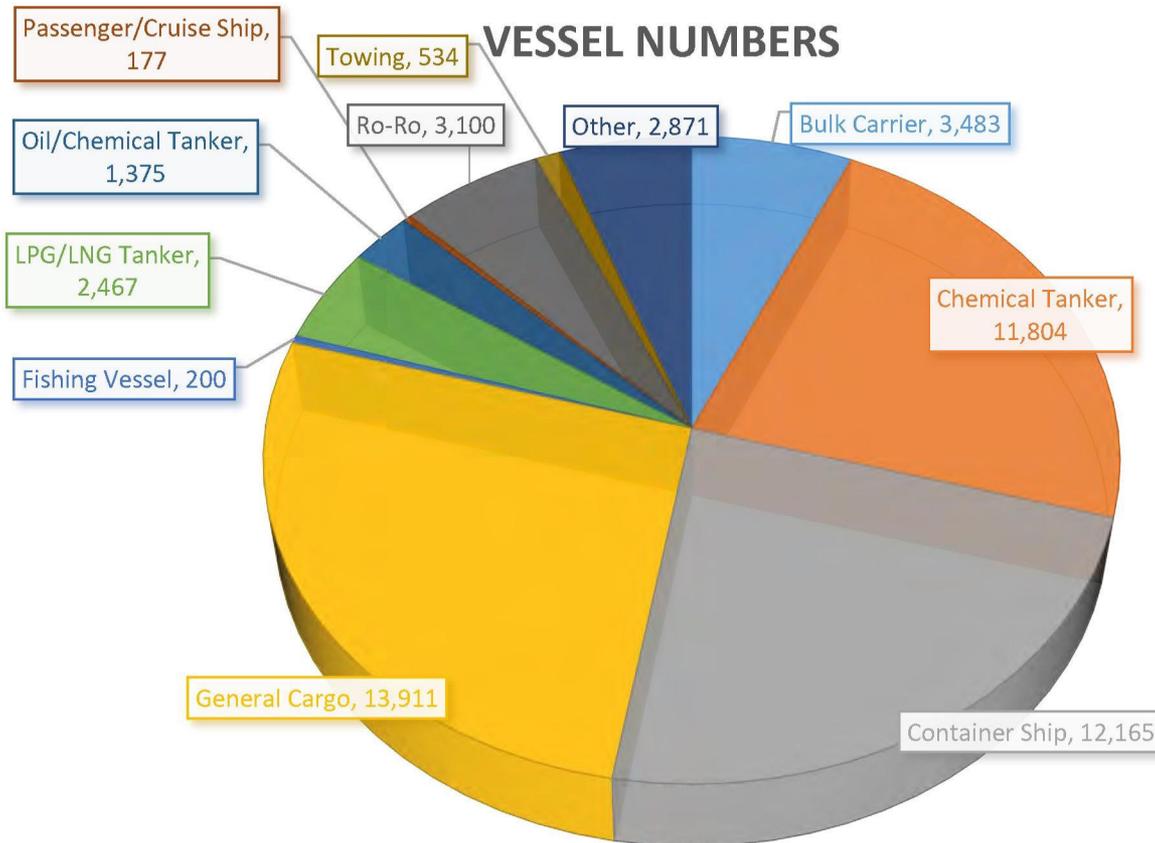
Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Vessel Numbers Summary

01/01/2020 – 31/12/2020



HM Coastguard

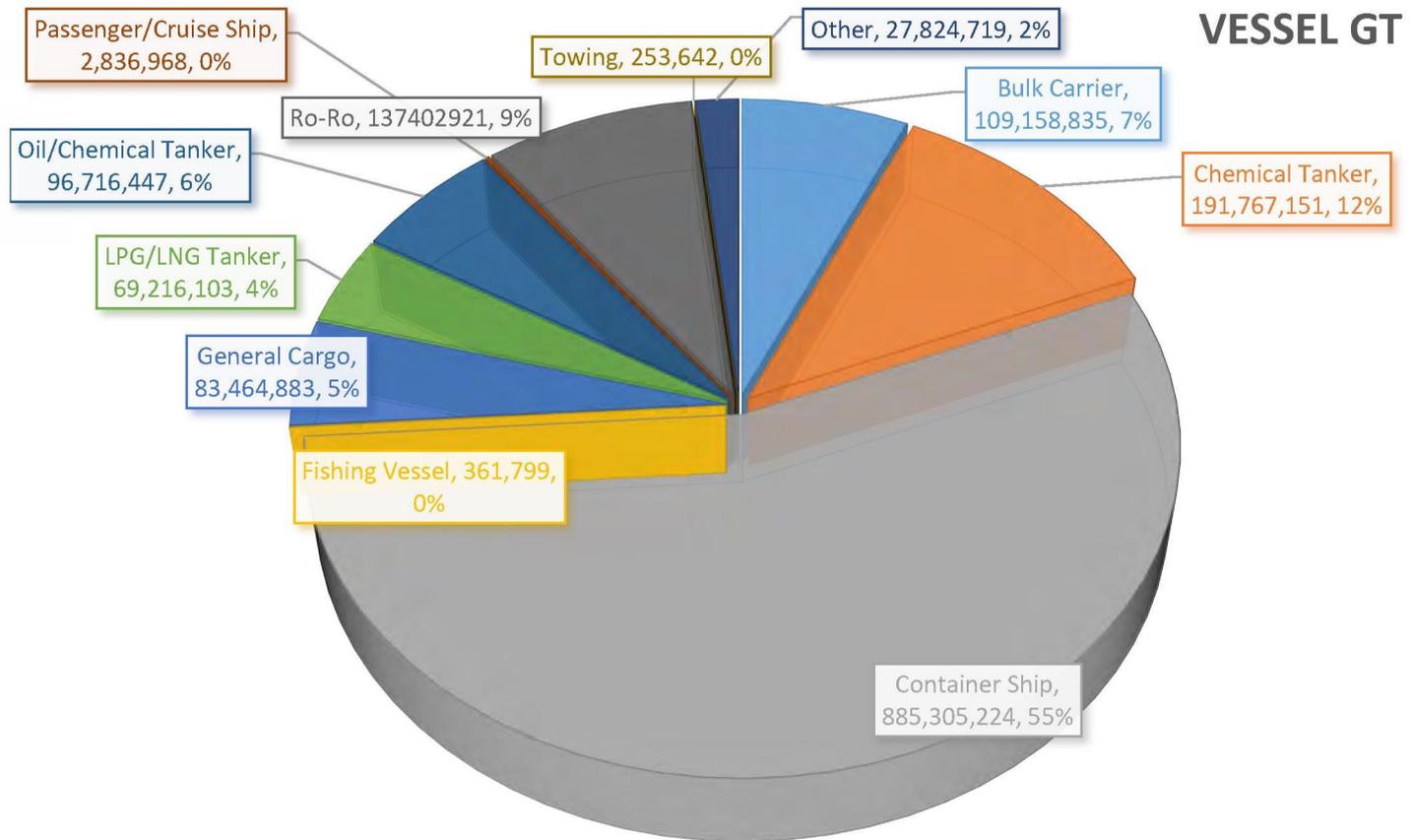
Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Vessel Tonnages Summary

01/01/2020 – 31/12/2020



HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency

# Contraventions by Type

February 2020 to December 2020

Month	F3	Sunk Centre	10 b i	10 b ii	10 b iii	10 c	10 d i	10 i	10 j	5	6	8	15	17	Sunk 12	Totals	Events
February			2					2								4	2
March	2		1			3				2					1	8	7
April	1		1			1		1		2			1			7	5
May	1		1			1	1		1	1						6	5
June			1			1				4						6	5
July			1			2				1	1					5	3
August	2	1	1			2			2	3						12	8
September	1		2					1		1						5	4
October						2	1		1	1						5	4
November	2		2			4			1							9	8
December	1	1				3				1						6	5



HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas



# Maritime & Coastguard Agency

## Contraventions by Flag State

	France	Belgium	UK	Liberia	Antigua & Barbuda	Russia	Latvia	Maderia	Italy	Netherlands	Hong Kong	Marshall Islands	Finland
February	1	1	1										
March		1		2	1	1	1	1	1	1			
April			2			1		1		1	1	1	
May	1												1
June	1												
July			2		1								
August			1	1						2		1	
September	2		1										
October	1		3							1	1		
November		1	1	2						1			
December							1		1	1		1	
<b>Totals</b>	<b>6</b>	<b>3</b>	<b>11</b>	<b>5</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>7</b>	<b>2</b>	<b>3</b>	<b>1</b>

	Spain	Panama	Vanuatu	Denmark	Malta	Austria	Germany	Barbados	Bahamas	Singapore	Unidentified	Cyprus	Total
February													3
March													9
April											1		8
May	1	1	1	1									6
June					1	1	1						4
July							1						5
August								1	1				8
September								1		1			5
October													6
November			1										6
December												1	5
<b>Totals</b>	<b>1</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>65</b>



HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas



Maritime &  
Coastguard  
Agency



# HM Coastguard

## Thank you

Name

Name

[@mcga.gov.uk](mailto:Name@mcga.gov.uk)



HM Coastguard

Safer Lives, Safer Ships, Cleaner Seas



## Centre Régional Opérationnel de Surveillance et de Sauvetage

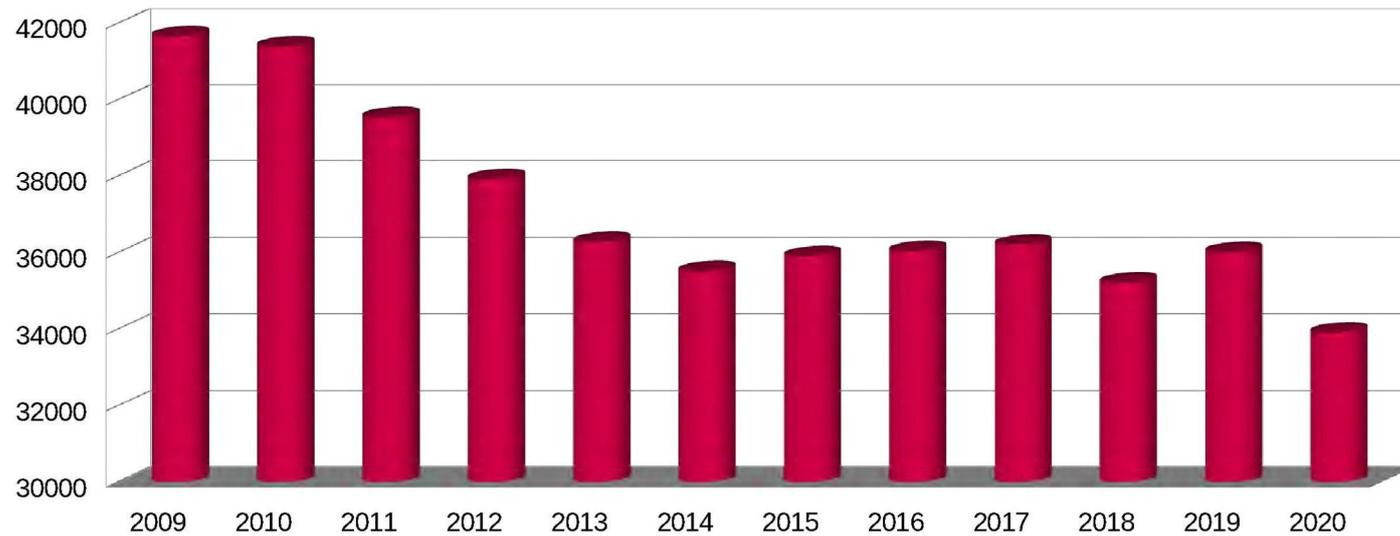
### CROSS GRIS-NEZ



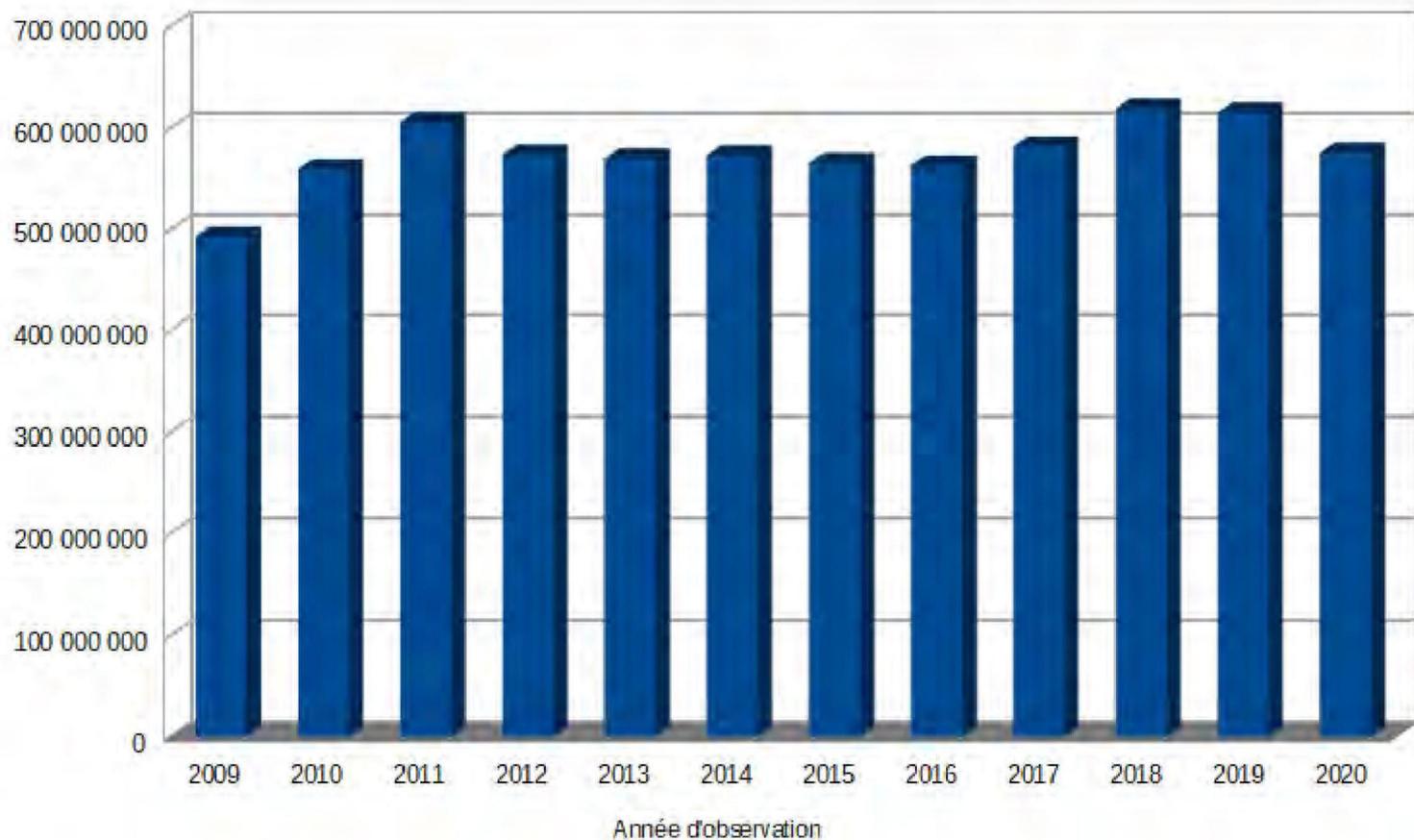
**MINISTÈRE  
DE LA MER**

*Liberté  
Égalité  
Fraternité*

## Nombre de comptes rendus obligatoires en voie montante



Number of 2020 CALDOVREPS in the NE lane : **33 924**  
- 6 % in comparison with 2019



Total quantity of cargo having transited in the NE lane : **576 million tons**  
 - 6 % in comparison with 2019

# Impact of Covid on commercial maritime traffic (North-East lane of the TSS)

