

OTAR 170 – LOG OF COMMENTS RECEIVED DURING THE CONSULTATION PERIODS – 12 JANUARY TO 7 APRIL 2026

OTAR Reference	Date	Commenter	Comment Summary	Discussion/Decision	Status
General Email via BCAA from Bermuda Coast Guard	12/02/2026	Jeff Patterson	•Further clarification of the respective roles and operational boundaries between Central Alerting Posts (CAPs) and Rescue Coordination Centres (RCCs); •Consideration of incorporating measurable performance standards to support consistency and transparency; •Additional emphasis on Mass Rescue Operation (MRO) planning to address large-scale incidents; •Inclusion of language that encourages the integration of modern technologies to enhance SAR capability; •Review of minor drafting duplications and textual inconsistencies; •Clearer delineation between aeronautical SAR Regions (SRRs) and maritime SAR Regions to minimise potential ambiguity.	The definitions are as described in Annex 12. Further guidance is available in the IAMSAR manual. Outside the convention requirements and not enforceable by ASSI. Please provide details. Not sure what you mean by delineation. Do you mean the two (aeronautical/maritime) coinciding?	No change. OTAR revised for second consultation. 170.29 add SAR Plan MRO plan or provisions for MRO. No change. Need further information. OTAR revised for second consultation.

Email response from RBCG.	05/05/2026	Jeff Patterson	•Further clarification of the respective roles and operational boundaries between Central Alerting Posts (CAPs) and Rescue Coordination Centres (RCCs). •Clearer delineation between aeronautical SAR Regions (SRRs) and maritime SAR Regions to minimise potential ambiguity.	Discussion regarding definitions for CAP and RCC as described in the Chicago Convention and what is available in the IMSAR Manual, but nevertheless the need to clearly explain the practical differences between the two.	OTAR revised for second consultation.
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Email from BVIAA/BVI DDM received.	09/06/2026	Jesen Penn	1. Proportionality for Small Overseas Territories Consider including a proportionality clause within Subpart B or Appendix B to recognise the varying operational capacities of Overseas Territories. Suggested wording: "The Governor may approve scalable Search and Rescue (SAR) arrangements appropriate to the size, geography, traffic density, available resources, and risk profile of the Territory, provided an equivalent level of SAR effectiveness is achieved." This would improve the applicability of the OTAR across Territories with differing operational capabilities and resource constraints. 2. Clarification of CAP and RCC Responsibilities The draft would benefit from additional clarity regarding the respective roles and responsibilities of Central Alerting Posts (CAPs) and Rescue Coordination Centres (RCCs), particularly in Territories operating within the Search and Rescue Region of another State. Consider including: • Escalation workflows and decision-making processes; • Transfer-of-command criteria; • Authority and reporting hierarchies;	1. IAMSAR Vol I section 2.1 SAR as a system already recognises this ("Every SRR has unique transportation, climate, topography and physical characteristics. These factors create a different set of problems for SAR operations in each SRR. Such factors influence the choice and composition of the services, facilities, equipment and staffing required by each SAR service.") so I don't think we need to add this specifically to the OTAR as it is specifically referred to in App. B. 2. This is no different to an RCC and should be covered by internal policies and procedures (or plans).	No change. No change.
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			• Notification and response timelines; and • Fallback arrangements during communications outages or degraded operating environments. During emergency responses, these additions would improve operational consistency and lessen uncertainty. 3. Search and Rescue Operations During Major Natural Disasters Given the vulnerability of many Overseas Territories to hurricanes and other natural hazards, consideration should be given to including provisions for SAR operations during major disasters. Areas that may warrant inclusion include: • Continuity of operations planning; • Redundant and satellite-based communications; • Operations in degraded AIS, radar, or telecommunications environments; • International military and humanitarian assistance coordination; • Interoperability with national disaster management agencies and emergency operations centres; and • Alternate coordination arrangements when primary facilities are compromised.	3. This is covered in IAMSAR Vol I section 2.1 - unique transportation, climate, topography and physical characteristics so this should already be part of the planning. This is viewed as a specific operational or OT specific requirement and should be considered in the wider SAR plan.	No change.
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		4. Integration of Volunteer and Auxiliary Response Resources The draft appears to assume the availability of formal SAR units. However, many Caribbean Territories routinely rely upon support from yacht operators, fishing vessels, volunteer organisations, and other civilian maritime resources. Consider including provisions relating to: • Tasking authority; • Operational control during SAR missions; • Credentialing and competency requirements for volunteer responders; • Liability protection arrangements; and • Integration of auxiliary resources into SAR planning and exercises. Such provisions would better reflect the operational realities of small island Territories.	4. Same as note 3 above.	No change
		5. Environmental Protection and Pollution Response Coordination Consider strengthening the provisions relating to environmental protection by explicitly integrating SAR planning and coordination with: • Oil spill response arrangements; • Environmental emergency management frameworks;	5. Same as note 3 above and this is adequately covered in OTAR 170 Appendix D (I).	No change.

		• Salvage and wreck removal coordination; and • Relevant environmental protection authorities. This would improve coordination where SAR incidents result in actual or potential environmental impacts. 6. Cyber and Digital Resilience Given the increasing reliance on digital systems and satellite-based navigation, consideration should be given to including provisions relating to cyber and digital resilience. Potential areas include: • Cybersecurity protections for SAR communications and information systems; • Offline charting and backup navigation capabilities; • Continuity arrangements during GNSS outages or disruptions; • Data backup and recovery procedures; and • Alternative methods for locating and tracking distress assets during technology failures. 7. Appendix C Appendix C appears to contain repetition of the SAR Mission Coordinator (SMC) operational control provisions.	6. This sits outside the scope of the IMSAR Manual and Annex and therefore beyond the scope of the OTAR. For future consideration as and when ICAO issues a State Letter. Noted and changed.	No change. But saved for future considerations. Minor edit complete. No significant impact to overall requirements.
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			Paragraphs (j), (l), and (m) contain substantially similar requirements regarding retention of operational control of SAR missions. Consider consolidating these provisions into a single clause to improve clarity and avoid duplication. The Department of Disaster Management supports the development of OTAR Part 170 and believes the above recommendations would further strengthen the regulation by enhancing its applicability to small island Overseas Territories, improving disaster resilience, and reflecting the operational realities of SAR response within the Caribbean region.		
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