INTERNATIONAL
MARITIME
ORGANIZATION

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MARITIME SAFETY COMMITTEE
95th session
Agenda item 19

MSC 95/19/15
14 April 2015
Original: ENGLISH

WORK PROGRAMME

**Implementing e-navigation to enhance the safety of navigation and protection
of the marine environment**

Submitted by the International Maritime Pilots' Association (IMPA)

	SUMMARY
Executive summary:	This document comments on document MSC 95/19/8, "Implementing e-navigation to enhance the safety of navigation and protection of the marine environment"
Strategic direction:	5.2
High-level action:	5.2.6
Planned output:	No related provisions
Action to be taken:	Paragraph 12
Related documents:	Resolutions A.1061(28) and A.1062(28); MSC-MEPC.1/Circ.4/Rev.2; MSC 95/19/8; MSC 81/23/10; MSC 85/26/Add.1; MSC 94/18/8; MSC 94/18/10, MSC 94/21; NAV 58/14; NAV 59/INF.8; NCSR 1/9, NCSR 1/9/1 and NCSR 1/28

Introduction

1   This document is submitted in accordance with paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.3) and comments on the proposal in document MSC 95/19/8 for six outputs to be included in the High-level Action Plan for the following two biennia (2016-17 and 2018-19). Document MSC 95/19/8 also proposes to amend High-level Action 5.2.6 to support the Organization maintaining leadership and coordination of e-navigation.

Background

2   At MSC 94, the Committee approved the e-navigation Strategy Implementation Plan (SIP), as set out in document NCSR 1/28, annex 7. The Committee considered document MSC 94/18/8, proposing the plan of work for the Organization for the development of

e-navigation, together with document MSC 94/18/10, and invited Member Governments to review each of the tasks listed in the SIP with a view to reducing the numbers of outputs (MSC 94/21, paragraph 18.16).

3   MSC 95/19/8 proposes six outputs for inclusion in the High-level Action Plan for the following two biennia (2016-17 and 2018-19). These six outputs are:

.1   guidelines on standardized modes of operation (S-mode);

.2   an update, by adding new modules, to the *Revised performance standards for Integrated Navigation Systems (INS)* (resolution MSC.252(83)) relating to the harmonization of bridge design and display of information;

.3   a revision of the *Guidelines and criteria for ship reporting systems* (resolution MSC.43(64), as amended) relating to standardized and harmonized electronic ship reporting and automated collection of onboard data for reporting;

.4   amendments to the general requirements for shipborne radio equipment forming part of the global maritime distress and safety system (GMDSS) and for electronic navigational aids relating to Built-In Integrity Testing (BIIT) for navigation equipment;

.5   *Guidelines on the harmonized display of navigation information received from communications equipment*; and

.6   consideration of reports on development and implementation of Maritime Service Portfolios (MSPs) (and other e-navigation reports) by Member States and other international organizations.

4   The co-sponsors of MSC 95/19/18 indicate that the first 5 of the 6 proposed outputs are intended to produce specific documents for practical, user-based e-navigation enhancements.

5   The approach to output 6 seems quite different, however. Instead of narrowing the focus of the e-navigation initiative to specific, measurable, achievable, realistic, and time-bound deliverables, this output, as stated, is open and invites more and more, unconstrained e-navigation work to be performed by the Organization. It broadens the scope of e-navigation and proposes work on matters beyond what MSC 94 envisioned, even to subjects outside of IMO's traditional remit.

Discussion

6   As explained in the SIP, MSPs are shore-based services. The SIP lists 16 MSPs, including such things as tug service, pilotage, telemedical assistance, and SAR. MSC 95/19/8 (annex 6, paragraph 3) asserts that the MSPs need to be "properly reviewed" in order "to ensure that shore-based services are harmonized and compatible internationally." Proposed output 6 therefore envisions that Member States and other international organizations would undertake projects to achieve global harmonization of these 16 shore-based services.

7   The authority for this proposal is cited as Solution 9 from the SIP (but renumbered as S5 in MSC 95/19/8). However, Solution S5 itself addresses only "improved communication of VTS Service Portfolio (not limited to VTS stations)." MSC 95/19/8's proposed output 6 therefore would extend the scope of work beyond VTS services to all 16 listed MSPs and beyond simply <u>communication</u> of those services to the <u>services themselves</u>.

8   There is no demonstrated or accepted need to harmonize and standardize each of the 16 MSPs, especially such port State activities as tug services, pilotage, or telemedical assistance. In fact, trying to harmonize those services would take the IMO far beyond e-navigation and into areas outside of IMO's traditional activities. In the case of pilotage, for example, the IMO has stated quite clearly in resolution A.960 that the "IMO does not intend to become involved with the systems of pilotage practised in various States."

9   The sponsor of this document also does not believe that harmonization of many of these services is what was intended or agreed in the MSC 94-approved SIP. Although the SIP includes the further development of the MSPs as task 17, that task was not endorsed or suggested by the SIP, or by MSC 94, as an item to be included in the Organization's prioritized plan of work on e-navigation. It is identified in the table describing Solution 9 (now S5) as one of two tasks related to the solution, but only in the context of improving the communication of the VTS services portfolio. That notation on the table describing Solution 9/5 is not an approval of the entire scope of task 17.

10   The scope of output 6 extends even beyond the MSPs. It invites consideration, and submission, of reports on any subject denoted as e-navigation. It would presumably create a long-term, completely open, general e-navigation work item for the Organization. Moreover, an invitation for the submission of reports seems inconsistent with the notion of "output," which envisions a specific deliverable rather than an agenda item. Furthermore, "consideration of reports" does not in itself constitute or imply an output and barely connotes any needed action by the Organization. Such a nebulous agenda item does not make the best use of the Organization's time, and, in connection with e-navigation, is unnecessary. A Member State or international organization may always submit a report on an item, including e-navigation, for consideration by the Organization under "Any Other Business".

Proposed modification of MSC 95/19/8

11   IMPA believe it would be more reflective of the decisions of MSC 94 to delete the proposed output 6.

Action requested of the Committee

12   The Committee is requested to consider the above and decide as appropriate.

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