



IHB File No. S3/3055

CIRCULAR LETTER 54/2007
15 June 2007

Development of Carriage Requirements for ECDIS

Reference: IMO Document NAV 53/14/1 submitted by Japan

Dear Hydrographer,

1. The document in reference, a copy of which is enclosed, was submitted by Japan to the IMO NAV Sub-Committee for consideration at its 53rd session from 23 - 27 July 2007. This document supports the introduction of a phased in mandatory carriage requirement for ECDIS and at section 3 proposes an amendment to Regulation 19 of SOLAS with a new regulation to follow regulation 19.2.1.5 and the consequent re-numbering of the following paragraphs.

Japan's proposed new regulation includes the following text:

19.2.1.6.1.3 *Ships which are dedicatedly engaged on voyages in waters without ENC's may be exempted by the Administration from the requirement in this paragraph, provided that it complies the chart carriage requirement in paragraph 2.1.4*

19.2.1.6.1.4 *The Administration may grant to ships not engaged on international voyages equivalents of ECDIS such as other domestic electronic chart systems; and...*

2. It is the view of the IHB that 19.2.1.6.1.3 provides an unnecessary exemption particularly in view of Decisions 20 and 21 taken by the XVIIth IHC in May 2007. The IHB also considers that the proposed text for 19.2.1.6.1.4 provides an unnecessary introduction of unregulated ECSs into the SOLAS convention and only restates an Administration's authority to regulate vessels navigating within their waters as set out in regulation 3.2.

3. The IHB would intend to take the view expressed in paragraph 2 above in any discussions during NAV53 and requests that **Member States provide any comments to the IHB by 15 July 2007.**

On behalf of the Directing Committee
Yours sincerely,

Vice Admiral Alexandros MARATOS
President

Enc: NAV 53/14/1



SUB-COMMITTEE ON SAFETY OF
NAVIGATION
53 rd session
Agenda item 14

NAV 53/14/1
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DEVELOPMENT OF CARRIAGE REQUIREMENTS FOR ECDIS

Proposal for the application of carriage requirement for ECDIS

Submitted by Japan

SUMMARY

<i>Executive summary:</i>	This document contains the proposal for the application of carriage requirement for ECDIS
<i>Action to be taken:</i>	Paragraph 4
<i>Related documents:</i>	MSC 81/18/1; MSC 81/24/5; NAV 51/10 and NAV 52/6/2

1 At NAV 52, Japan provided the result of a FSA study about the cost-effectiveness of ECDIS (NAV 52/6/2), which indicated that the mandatory requirement of installation of ECDIS to cargo ships was justified as being cost-effective to achieve safety of navigation, in case of navigation mainly in the area where suitable ENC's are available. Also, the result implied that the mandatory requirement of installation of ECDIS to existing ships and small ships should be carefully examined. The Sub-Committee concluded that Member Governments were invited to submit suitable proposals and comments for consideration at NAV 53.

2 Japan is of the opinion that the following points should be taken into account when introducing carriage requirement for ECDIS.

2.1 Ship size and ship type

As stated in NAV 52/6/2, the cost-effectiveness of ECDIS depends on the coverage of ENC's. The carriage requirement of ECDIS should primarily apply to ships which get considerable advantages with ECDIS and limitation of application to larger ships would be appropriate. For example, such ships would carry more persons on board in each ship type, have deeper draught, and have much less controllability than smaller ships so that they reap more benefits for safety by ECDIS. Therefore, as a proposal, it seems that ships of 10,000 gross tonnage and upwards could be the scope of application because these ships are already required to be equipped with an automatic radar plotting aid and a heading or track control system, whose functions are effectively amplified through simultaneous use of ECDIS.

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Application of carriage requirement should not exclude any specific type of ships because the result of the FSA shows the same cost-effectiveness of ECDIS regardless of ship type.

Furthermore, as there is not enough supportive results from the cost/benefit assessment, ships navigating mainly in the area where appropriate ENC's are unavailable may need to be exempted from being fitted with an ECDIS, until when such ENC's are published.

2.2 Timing to start application to the existing ships

A mandatory requirement of installation of ECDIS to all existing ships at a time would bring unnecessary big burden or confusion to shipowners, ECDIS manufacturers and administrations. Taking into account such an impact, a certain gradual phase-in schedule by ship type and survey timing should be set.

2.3 Other related matters

2.3.1 ECDIS would provide an opportunity to reduce seafarers' workload in correcting paper nautical charts. For this purpose, the kind of paper nautical charts required as a back-up arrangement should be carefully discussed because ships would usually only need some critical paper charts such as sailing charts and coast charts, to call at a port for repairs when ECDIS goes out of order.

2.3.2 Technical co-operation is important to assist coastal States in publishing ENC's, especially where ENC's does not cover yet.

2.3.3 To keep the same level of accuracy comparing with the paper nautical charts, ENC's should be up to date the same as paper nautical charts.

2.3.4 Maritime broadband telecommunication systems would be desirable to enable the update of ENC's on board.

Proposal

3 After careful examination on various issues to be taken into account when considering the introduction of carriage requirement for ECDIS in the previous paragraphs, Japan prepared a proposal on a draft amendment to SOLAS chapter V for facilitating further discussion as follows:

A following new paragraph should be added after SOLAS chapter V, regulation 19.2.1.5, and the following paragraphs should be renumbered as appropriate.

“Regulation 19.2.1.6

All ships of [10,000 gross tonnage] and upwards shall be fitted with ECDIS, as follows:

- .1 ships constructed on or after [the date to be decided by the amendments];
- .2 ships constructed before [the date indicated in the subparagraph .1];
 - .2.1 in the case of passenger ships and tankers, not later than the first survey on or after [the date of 3 year after the date indicated in the subparagraph .1];

- .2.2 in the case of ships, other than passenger ships and tankers, not later than the first survey on or after [the date of 5 year after the date indicated in the subparagraph .1];
- .3 ships which are dedicatedly engaged on voyages in waters without ENC's may be exempted by the Administration from the requirement in this paragraph, provided that it complies the chart carriage requirement in paragraph 2.1.4;
- .4 the Administration may grant to ships not engaged on international voyages equivalents of ECDIS such as other domestic electronic chart systems; and
- .5 the Administration may exempt ships from the application of the requirements of this paragraph when such ships will be taken permanently out of service within two years after the implementation date specified in subparagraph .2.”

Action requested of the Sub-Committee

- 4 The Sub-Committee is invited to consider the above proposal and take action as appropriate.
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