

Dossier del BHI No. S3/3055

CIRCULAR No. 54/2007 15 de Junio del 2007.

### DESARROLLO DE LOS REQUERIMIENTOS DE TRANSPORTE DE ECDIS

Referencia: Documento de la OMI NAV 53/14/1 sometido por Japón.

Estimado(a) Director(a),

1. El documento indicado en la referencia, cuya copia se adjunta a la presente, fue sometido por Japón al Subcomité NAV de la OMI, para su consideración en la 53ª sesión, que se celebrará del 23 al 27 de Julio del 2007. Este documento apoya la introducción progresiva de un requerimiento obligatorio de transporte del ECDIS y, en la sección 3, propone una enmienda a la Regla 19 de SOLAS, con una nueva regla que seguirá a la regla 19.2.1.5 y la nueva numeración resultante de los párrafos siguientes.

La nueva regla propuesta por Japón incluye el texto siguiente:

- 19.2.1.6.1.3 Los buques que efectúan continuamente viajes sin ENCs pueden ser dispensados por la Administración del requerimiento mencionado en este párrafo, siempre que cumplan el requerimiento de transporte de cartas mencionado en el párrafo 2.1.4
- 19.2.1.6.1.4 La Administración puede otorgar a los buques que no efectúen viajes internacionales equivalentes del ECDIS como otros sistemas de cartas electrónicas nacionales; y...
- 2. El BHI opina que el apartado 19.2.1.6.1.3 proporciona una dispensa que no es necesaria, especialmente teniendo en cuenta las Decisiones 20 y 21, tomadas por la XVIIª CHI, en Mayo del 2007. El BHI considera también que el texto propuesto para el apartado 19.2.1.6.1.4 proporciona una introducción inútil de los ECS en la Convención SOLAS y reafirma sólo la autoridad de la Administración para reglamentar los buques que navegan en sus aguas, tal y como está establecido en la regla 3.2.
- 3. El BHI tiene la intención de adoptar el punto de vista expresado en el párrafo 2 anterior en las discusiones que tendrán lugar durante NAV53 y solicita a los **Estados Miembros que proporcionen sus comentarios al BHI antes del 15 de Julio del 2007**.

En nombre del Comité Directivo

Atentamente,

Vice-Almirante Alexandros MARATOS
Presidente

Anexo: NAV 53/14/1 (en Inglés)





SUB-COMMITTEE ON SAFETY OF NAVIGATION 53 rd session Agenda item 14 NAV 53/14/1 18 May 2007 Original: ENGLISH

# DEVELOPMENT OF CARRIAGE REQUIREMENTS FOR ECDIS

# Proposal for the application of carriage requirement for ECDIS

## **Submitted by Japan**

#### **SUMMARY**

**Executive summary:** This document contains the proposal for the application of carriage

requirement for ECDIS

Action to be taken: Paragraph 4

**Related documents:** MSC 81/18/1; MSC 81/24/5; NAV 51/10 and NAV 52/6/2

- 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 ENCs 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 ENCs. 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.

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 ENCs are unavailable may need to be exempted from being fitted with an ECDIS, until when such ENCs 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 ENCs, especially where ENCs does not cover yet.
- 2.3.3 To keep the same level of accuracy comparing with the paper nautical charts, ENCs 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 ENCs on board.

### **Proposal**

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, regulation19.2.1.5, 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];

- 3 - NAV 53/14/1

- 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];
- ships which are dedicatedly engaged on voyages in waters without ENCs 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.