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## RE: INVITATION TO REVIEW DRAFT IHO GUIDANCE DOCUMENT ON CROWDSOURCED BATHYMETRY

1 message

**John Murray** <John.Murray@ics-shipping.org>  
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 Cc: "info@iho.int" <info@iho.int>

Thu, May 18, 2017 at 8:19 AM

Dear Jennifer,

Further to your kind invitation to review the Draft IHO Guidance Document on Crowdsourced Bathymetry, we have reviewed the document and have the following comments. Also, I do not think that we have met and so by way of a brief introduction, the International Chamber of Shipping (ICS) is the principle global trade association for shipowners and operators. As a trade association of national shipping associations, ICS represents 80% of the world's merchant tonnage at the IMO and beyond. We appreciate the opportunity to comment on the draft IHO Guidance document on crowd-sourced bathymetry data (CSB). The legal issues highlighted in section 5 of the document will be reviewed separately by our Legal Department and any appropriate comment will be provided in due course. Our comments on the document provided are summarised as follows:

1. ICS supports the concept of CSB where it has the primary objective of identifying uncharted features, assisting in the verification of charted information and confirming that existing charts are appropriate for the latest traffic patterns. More importantly, CSB is a means of allocating scarce survey resources to areas of most need and ensure that coastal States meet their obligations under SOLAS V/9 and shipping company meet their obligations under SOLAS V/19 and V/27 in a manner which ensures that official charts which meet the requirements of marine navigation are used for navigation. That said, ICS is concerned that this may be seen by some coastal States as a mitigating measure which allows further reductions in the resourcing of hydrographic survey activity. This would be of grave concern to the industry, particularly as, taking into account the detailed requirements contained in IHO standards, CSB is not a perfect substitute for properly conducted hydrographic surveys.

2. Beyond the requirements of international shipping, we further acknowledges the potential benefits for addressing the lack of data for which the hydrographic and scientific community has need (as referred to in the IHO Statement on CSB).

3. Following previous information provided to ICS last year regarding the CSB initiative, we were of the understanding that direct reporting to the DCDB for the required data in Table 1 of the Guideline would be the norm. Therefore we are surprised by the advent of the Trusted Node system and the additional complexities introduced. We are also not convinced that existing Trusted Nodes are in a position to adequately support the needs of international shipping, particularly with respect to installation assistance (refer to page 51). For example, simple data loggers may be appropriate for leisure craft but NMEA 0183 interfaces on ship systems should be installed in accordance with the recommendations of the manufacturer and requirements of IMO and IEC, as appropriate. This means that there may not be spare NMEA ports available on board to allow for the connection of additional data logging devices without amendments to installation wiring. This is both potentially costly, and may be considered unacceptable interference with mandatory equipment on board ships. Moreover, any data logger would have to be tested in accordance with IEC-60533 (Electrical and electronic installations in ships - Electromagnetic compatibility (EMC) - Ships with a metallic hull) and IEC-60945 (Maritime navigation and radiocommunications equipment and systems - General requirements - Methods of testing and required test results).

4. Furthermore, the Trusted Node system, whilst understandable, opens the door to commercial providers of Trusted Nodes with the opportunity to exploit the data for profit, in addition to contributing to the DCDB. For example, one of

the industry partners already advertises the fact that the data is provided to Google in addition to the DCDB. The shipping industry is not a data provider for the benefit of commercial interests and the provision of data from ships to the DCDB should be a closed system for the benefit of those that collect the data, hydrographic offices and oceanographic and scientific research.

5. In considering whether ICS could recommend to its Members that companies and ships participate in the scheme, the following factors would need to be taken into account:

- a. The actual ability of the Trusted Node system to effectively support international shipping. Commercial ships are not leisure craft and are covered by international regulation and requirements which may complicate installation of data loggers.
- b. The availability of appropriate data loggers for use on board ships. In this regard, we note the availability of commercial grade echo-sounders with logging capability which may be more suited to commercial applications and would include the required data in table 1 and some elements of the meta data in table 2. This data could then be provided directly to the DCDB.
- c. The opportunity for companies and ships which engage in the scheme to be able to access official charts and nautical publications at a reduced cost. We note that whilst other users of DCDB data may be able to use the information freely, international shipping is limited in its ability to obtain value from the data because we are only able to use it for our core business once it is included in official charts and nautical publications.
- d. The administrative burden on shipboard personnel of collection and forwarding the data. Unfortunately the administrative burden of the initiative may be considered small by IHO but when it is a part of a cumulative and growing burden, this cannot be ignored. It may be an unfortunate consequence of the drafting of the Guidance, but there would seem to be more to this than the original proposal presented to ICS last year. Any recommendation to our Members would be predicated on the availability of a fully automated data collection, storage, uncertainty analysis and transmission system which required no involvement of the crew (other than mailing an SD card to the DSDB on a bi-annual or annual basis). As presented at SOT 9 this year, ICS would like to see the data collection requirements of all voluntary schemes combined into a single, automated data collection solution. Separate collection systems for different organizations is unhelpful.
- e. The availability of accessible and appropriate guidance to shipboard personnel. The guidance document, whilst clearly addressing all of the technical and procedural needs of IHO, will be of varying value to shipboard personnel. To that end, we would anticipate IHO and not Trusted Nodes developing simple best practice guidance for crew.

We would be very happy to discuss any of the above further, as appropriate.

Kind regards

John Murray

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Please find attached a letter to your attention :

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Yours sincerely

IHO

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