

INTERNATIONAL HYDROGRAPHIC
ORGANIZATION



ORGANISATION HYDROGRAPHIQUE
INTERNATIONALE

CHART STANDARDIZATION & PAPER CHART WORKING GROUP (CSPCWG)

[A Working Group of the Hydrographic Services and Standards Committee (HSSC)]

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To CSPCWG Members

Date 7 July 2010

Dear Colleagues,

Subject: CSPCWG6 Actions 10-13 – use of adjective ‘Foul’ (further to Letter 07/2010)

Thank you to 21 CSPCWG representatives who responded to CSPCWG Letter 07/2010. This subject is proving very difficult to resolve. I thank you for your patience and the deep thought you have clearly applied as we try to work out a long term solution that will avoid confusion for chart users and compilers alike. It seems we have not been well-served by our English-speaking predecessors who have allowed this dual meaning to develop, but we must make the best of it.

As usual, we have placed a consolidated response form at Annex A, with your Chairman's and Secretary's thoughts added in red. All the arguments which have been put forward are good, but are not all compatible. I have summarised my revised suggestions at Annex B, in which I hope I have found a solution which will achieve the best result for users, even though some of us may have to adjust our present charting practice.

Please complete and return the attached Response Form at Annex C, **not later than 4 August 2010**.

Yours sincerely,

Peter G.B. Jones,
Chairman

Annex A: Consolidated responses to Letter 7/2010, with Chairman's comments

Annex B: Revised suggestions.


Annex C: Response Form

Consolidated Responses to CSPCWG Letter 07/2010

	Question	Yes	No
1	Should the entry for 'Foul Area' be included in INT1 at:	DE, ES, PK, US	IN, NL, UK
	a) K1 (as K1.2)	BR, DK, ES, ESRI, FI, ID, LV, NO, NZ, UA	AU, DE, GR, FR, IN, NL, UK, US, ZA
	b) K32	CA, DE, FR	AU, BR, DK, FI, GR, ID, IN, LV, NL, NO, NZ, UK, US, ZA
	c) somewhere else (please explain)?	SE	AU, DE, DK, FI, FR, GR, ID, IN, NO, NZ, UK, ZA
2	Should a black version of the CA symbol for a Foul Area be adopted as an International symbol?	BR, CA, DK, ES, ID, LV, NZ, PK, SE	AU, DE, ESRI, FI, FR, GR, IN, NL, NO, UA, UK, US
3	Do you agree to expand the guidance for depiction of Foul Areas as below (based on the CA specification)?	AU, BR, CA, DK, ES, FI, ID, LV, NZ, PK, SE	AU, DE, ESRI, FR, GR, IN, NL, NO, UA, UK, US, ZA
4	Do you agree that the specification for 'stumps' should be moved from B-327.5 to B-422.9 (before the list of cross references)? (These are not topographic features)	AU, BR, CA, DE, DK, ES, ESRI, FI, FR, GR, ID, IN, LV, NL, NO, NZ, PK, SE, UA, UK, US, ZA	

Draft

B-422.8 A **Foul Area** is an area of numerous uncharted dangers to navigation. It must be delimited by a danger line, (K1*, see B-420.1). Further attention may be drawn to the dangers in the area, as appropriate, by:

- Insertion of actual, or a representative selection of, rock symbols (K10-13, see B-421)
- insertion of other dangers eg wrecks, stumps (K43.1, see B-327.5 or B-422.9)†
- insertion of the weed symbol without depths (J13.2, see B-428.2)
- Insertion of the foul area symbol within the area:  (K1.2 or K32)*
- For large areas, addition of a legend 'Foul' or 'Foul Area'. (In such areas, the legend Foul Ground must not be used).

For an area of sea floor debris over which it is safe to navigate (ie **Foul Ground**), such as the distributed remains of a wreck, see B-449.7.

* depending on outcome of question 1.

† depending on outcome of question 4.

Comments:

AUSTRALIA

Q1: The possibility of including an entry for foul area at K1 was discussed at CSPCWG6, and was rejected by the meeting [I do not recall that] on the grounds that K1 is the generic danger line symbol, which can be used for purposes other than foul area which are also not referenced at K1. Given the arguments presented at CSPCWG6 that INT1 is a guide for the chart user and from this perspective there has been no indication of confusion from mariners, AU would prefer no entry at all be included in INT1.

The current description given for danger line at K1 includes the words "... delimits an area containing numerous dangers, through which it is unsafe to navigate.", which mirrors the definition of foul area in S-32. To the mariner, the term "foul area" has little meaning in the context of using the chart – if there is a danger line with a blue area behind it on the chart, any mariner with common sense will not take their vessel into the area, regardless of any additional information shown in the area, based on the description of the symbol give at K1. At CSPCWG6, it was conceded that the confusion is more in

the mind of the compiler from the perspective of distinguishing between the terms foul ground and foul area, and as such AU supports the resulting CSPCWG6 actions for changes to S-4. But why should CSPCWG create the potential for the mariner to have the same confusion by introducing the term “foul area” into INT1? AU would therefore prefer not to see an entry for foul area in INT1. **Chairman: this seems to be a good argument; why risk creating confusion if it does not presently exist?**

Q2 & 3: In line with the AU comments for question 1, AU does not agree with the adoption of an international symbol for foul area. Such a symbol does not provide any additional information about the actual foul area to the mariner, and as has been stated above, AU does not consider that the addition of such a symbol emphasizes the area any more than the K1 symbol with blue tint behind already does. Any other instances of symbols within danger lines in INT1 provide additional information about the nature of the area behind the danger line, such as K16, 22, 23, 40, 46. **[Agree, another good argument].**

Regarding the expanded guidance, the yes/no response is an indication that while AU does not agree with the draft wording, some additional guidance may be added. In regard to the current draft wording, the first 3 bullet points render the area no longer a “foul area”, as the dangers to navigation are no longer “uncharted”, as is defined in the first sentence of the clause (and in the S-32 definition). The fourth bullet point is redundant if the symbol is not adopted, and the fifth bullet point should not be inserted as AU considers it creates potential confusion for the user in regards to the term “foul”, as stated above. However, if the characteristics of the uncharted dangers are known, it may be useful to provide to the mariner such an indication. Additionally, there is no mention in the new draft B-422.8 of blue tint being required behind the danger line, similar to that included in B-422.9. AU therefore suggests that the first paragraph be amended similar to:

B-422.8 A Foul Area is an area of numerous uncharted dangers to navigation. It must be delimited by a danger line, (K1, see B-420.1). Blue tint [should/must] be added within the foul area. Further information may be provided by insertion of the appropriate symbol(s) within the area (eg rock, wreck, stump) to indicate the characteristics of the uncharted dangers to navigation, where known.

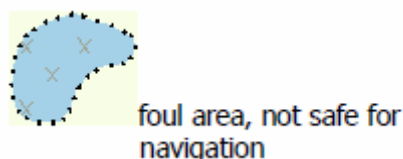
ESRI

2. If the chart is large scale, or the Foul Area is large enough to be depicted as an area, then ESRI would prefer to use K1 with the legend “Foul” or “Foul Area”. If the feature is depicted at small scales, or is a point, then ESRI would prefer the insertion of actual, or representative selection of, appropriate Foul Area symbol, be it K10-13, K43.1 or J13.2, etc.

3. ESRI prefers INT1 ‘Foul Area’ symbology to be retained as it is, with the exception of adding K1.2 per question 1.a) above.

FINLAND

If an international is introduced, we would prefer one that is more like the existing 'foul area' symbol in S-52 – a (fill) pattern of small x-shapes. The paper version could be, for example, a small group of crosses instead of a fill pattern. The CA symbol is acceptable, but would create new portrayal differences between ECDIS and paper chart. **[Chairman: a good point and the majority prefer not to adopt this symbol].** (The image below is an extract from TSMAD20/DIPWG2-14A.).



FRANCE

1/ 2/ From the definition of Foul Area given by S-32, FR understands that a Foul Area can include some dangers (“The area charted serves as a warning to the mariner that all dangers are not charted individually”). It appears that the representation of a Foul Area is a combined symbol of K1 with the other symbols of dangers for navigation which already exist (basically rocks, wrecks, obstructions,

stumps of post...). This situation does not require any new entry in INT 1 [Agree]. FR suggests that such areas can also include a legend which describes the nature of the danger for the large areas, [eg 'numerous rocks'] as well the legend "Foul Area". And, this situation is symbolised by a legend Foul Area surrounded by a line of danger (K1) and required a new entry in INT 1 (K32) [Disagree, in line with AU argument].

3/ FR agrees to expand the guidance for depiction of Foul Areas with the following remarks:

- From the definition of Foul Area given by S-32, the term "foul" should not be applied to areas congested with marine vegetation such as kelp or grass in water. FR suggests that the reference to weed should not be retained in B-422.8 or to modify S-32. [S-4 B-428.2: 'Kelp is an indication of the presence of submerged rocks'].
- FR suggests also that the legend Foul Area has to be used entirely and the use of Foul alone should be forbidden to avoid any ambiguity [Agree]. In this way, K31 should be amended in order to adopt the "full" legend Foul Ground rather than the partial legend Foul. [Or better to avoid the legend 'Foul' at all].
- the fourth bullet depends on outcome of questions 1 and 2.

GERMANY

DE prefers to create a new subsection Fouls with K31 and K32 in INT 1. There the both options (area and point symbol) for each case should be shown. It is important that the symbols can be distinguished and are self-explanatory. To avoid user confusing we propose to stop using the legend "Foul" [this suggestion is good; can it be achieved?] and therefore use the point symbols also in the area (the same as with the Entry Prohibited symbol). [ie As a centred symbol and/or embedded in the outer limit] The last bullet of B-422.8 confuses in our opinion and should be deleted.

B-449.7 should be changed accordingly.

L22 also refers to B-422.8, should it be deleted? [Depends on final outcome; the reference in INT1 may need changing but not deleting] I am looking forward to the further discussion at the next INT1 subWG meeting.

GREECE

1. For cases of "uncharted dangers to navigation", as the definition of a "Foul Area" dictates (IHO Dictionary S-32, 1915), the K1 symbol (danger line with blue tint) adequately covers the need for safe navigation, since it discourages navigation within Foul Areas..

3. Therefore GR would prefer INT-1 "Foul Area" symbology to be retained as it is [Agree, ie no change to INT1], and S-4 to be revised as suggested below:

B-422.8 A **Foul Area** is an area of numerous uncharted dangers to navigation. It must be delimited by a danger line with blue tint, see K1, B-420.1. In cases where the nature of the uncharted dangers is known (eg. Rock, coral, wreck, stump, etc) the appropriate symbol(s) must be inserted within the area in order to provide further information.

INDIA

We agree with the definition 'foul ground' by the HDWG Secretary. An area which is dangerous to navigation has been depicted with INT1 as symbol K1 and other specific dangers shown as K20 to K30. Since K1 solves the purpose of dangerous areas, it would confuse the mariner if additional symbol of 'Foul' with danger limit is used. Therefore we are not in favour of using 'Foul' word in to two different usages viz., one is safe to surface navigation (Foul Ground) and other is dangerous for navigation (Foul Area). [Agree; but we are seeking to resolve a situation that already exists].

INDONESIA

For Indonesia the Canadian symbol is new and consider as an option, therefore we would wait until it being insert in INT 1.

NORWAY

Foul, Foul Area and Foul Ground are difficult subjects, and are not easily understood by people from non English speaking nations [or apparently, by English speakers from different nations!]. The

difference between the terms is not obvious. We think mariners who do not have English as first language will rather name the actual submarine elements or obstructions (rocks, wrecks, corals etc.) when dealing with such areas [Agree]. Therefore we think the first sentence should be written in the same way as the last sentence, with Foul Area in parenthesis like this:

B-422.8 An area of numerous uncharted dangers to navigation (ie sometimes termed **Foul Area**) must be delimited by a danger line, (K1*, see B-420.1). Further attention may be drawn to the dangers in the area, as appropriate, by:

Chairman: we English-speakers need to recognise the potential difficulties created for non-English speakers. I agree with NO that it would be better to name the actual dangers, using legends such as 'numerous rocks', 'coral heads' rather than the indeterminate and potentially confusing legends 'Foul' or 'Foul Area'.

NEW ZEALAND

The Canadian symbol for foul areas is useful as an option, as long as we also retain the text 'Foul' and 'Foul Area' as an option. As the Canadian symbol is new to us and therefore to NZ mariners, we would wait until it is inserted in INT 1 before using it.

SWEDEN

Q1: As indicated in CSPCWG Letter 07/2010 'Foul Area' usually constitute natural obstructions (rocks). SE therefore suggests that 'Foul Area' should be included in the Rocks sub-section (K10-17). Especially K16 [Coral reef] do have almost the same meaning as 'Foul Area', but in K16 there are coral reefs instead of rocks. Entry K18 would be an option.

If 'Foul Area' is not included in the Rocks sub-section SE is in favour of option a (include Foul Area the General sub-section as K1.2).

UK (Senior Policy Advisor)

The horizontal line on the proposed symbol suggests to me that there is something visible above the sea surface.

US

The Hydrographic Dictionary (IHO Pub. S-32) defines "Foul Area" as, "An area of numerous uncharted dangers to navigation. The area charted serves as a warning to the mariner that all dangers to navigation are not charted individually and that navigation through the area may be hazardous. The term foul should not be applied to a soft continuum with indefinite boundaries such as mud or sand; to areas congested with marine vegetation such as kelp or grass in water; or to materials not likely to cause damage to a vessel."

The S-32 definition of "foul area" states that this is an area of numerous uncharted dangers to navigation. Insertion of actual, or a representative selection of rock symbols may lead the mariner to mistakenly believe that all dangers have been charted within the area [the definition actually allows for a representative selection (in the second sentence), as inferred by FR, but US has a point about the danger of doing that]. The purpose of charting a foul area is to avoid charting individual dangers. The same holds true with wrecks, stumps, etc. A foul area should be devoid of individually charted dangers in order to discourage navigation within the area. [Which is exactly as currently shown at K1]

Insertion of the "weed symbol" is contrary to the S-32 definition....."The term foul area should not be applied to areas congested with marine vegetation." [the definition seems at odds with the statement in S-4 B-428.2: 'Kelp is an indication of the presence of submerged rocks'].

It is questionable how many mariners outside of Canada would recognize the proposed symbol for a foul area. It is not very intuitive and will not fit in narrow foul areas [Agree]. If adopted by IHO, we concur with NZ that its use outside of Canada should not be used until it is published in INT1.

Suggested Way Forward By Chairman

1. In accordance with the ‘votes’, we are united that ‘stumps’ should be moved to B-422.9.
2. By a small majority, backed by good arguments in the comments section, the CA symbol for a foul area should not be adopted as an INT symbol. (To serve the chart user we need to be very clear that new symbols are useful and intuitive.)
3. I think the argument from AU, supported by others in the comments, about avoiding creating fresh confusion for the user is valid, and I therefore propose that we do not add ‘Foul Area’ in any form or place in INT1. (There is no agreement about where it should go, anyway). (I had the opportunity to raise this matter with HSSC Chairman, a very experienced mariner and senior UK Navy officer; he was supportive of this approach.)
4. We agree that the key differentiation between symbols for foul area and foul ground is the use of a danger line. UK currently uses a symbol similar to a wreck for a foul ground with depth, eg ²⁵Foul ; maybe other HOs do the same? As the surrounding danger line could be interpreted to mean that the foul is in some way dangerous, I suggest such symbols should be changed to the # symbol, with depth in parenthesis adjacent.
5. I agree with Germany that, in the longer term, we should try to eradicate the word ‘foul’ from charts. It is not a standardized term and, therefore, it has too much potential for confusion. S-4 should therefore provide guidance that the # symbol should be used for areas of foul ground, within a dashed line if an area can be charted. K31 in INT1 will need to be amended accordingly, with the existing ‘true to scale area + legend’ symbol marked as obsolescent.
6. S-4: I suggest a rethink of our previous drafts:

B-422.8 A **Foul Area** is an area of numerous uncharted dangers to navigation. The area charted serves as a warning to the mariner that all dangers to navigation are not charted individually and that navigation through the area may be hazardous. The term foul should not be applied to a soft continuum with indefinite boundaries such as mud or sand; to areas congested with marine vegetation such as kelp or grass in water; or to materials not likely to cause damage to a vessel.

Foul Ground is an area over which it is safe to navigate but which should be avoided for anchoring, taking the ground or ground fishing (eg remains of wreck, cleared platform).

It is important to distinguish between these two uses of the description ‘Foul’ on charts. Therefore, the word ‘Foul’ should no longer be inserted on charts, because of the potential for confusion by the chart user.

A **Foul Area** must be delimited by a danger line, (K1, see B-420.1), filled with blue tint. Further information should be provided by appropriate legends, eg ‘numerous rocks’, ‘numerous obstructions’, ‘coral heads’, or may be provided by insertion of a representative selection of the appropriate symbol(s) within the area (eg rocks, wrecks, stumps) to indicate the characteristics of the uncharted dangers to navigation, where known. The legends ‘*Foul*’ or ‘*Foul Area*’ should not be used.

Areas of **foul ground** must be shown by symbol #K31/L22 centred within dashed limits where the extent is known and the area is large enough to be charted true to scale. For large areas, the # symbol may be included in the limit, ie: - - - - # - - - -. The background colour should be in accordance with the depth. Areas too small to be charted true to scale should be shown by the symbol alone. The legends ‘*Foul*’ or ‘*Foul Ground*’ should not be used. The depth over the area, if known, may be shown in brackets adjacent to the symbol, if required, eg #(22); the swept symbol K2 may be inserted underneath, if appropriate. This symbol should be used for sea floor debris, eg: the distributed remains of a wreck, a dropped anchor, the site of a cleared production platform (provided the platform has been removed to the sea floor). Note: Platforms which have been cut-off above the sea floor must be charted as obstructions, see B-422.9.

Response Form

(please return to CSPCWG Secretary by 4 August 2010)

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	Question	Yes	No
1	Do you agree to have no reference specifically to 'Foul Areas' in INT1?		
2	Do you agree in principle to word S-4 so that the use of the English word 'Foul' is gradually removed from charts?		
3	Do you agree to insert a depth in brackets adjacent to the # symbol, if required?		
4	Do you agree that where an area of foul ground is large enough to be charted true to scale, it should be according to the same principle as N2.2, N12.1, N20, ie: a. use the # symbol as a centred symbol in small areas of foul ground? b. use the # symbol in the limits of large areas of foul ground?		
5	Do you agree with the draft revised specification B-422.8?		

Comments:

Name:

Member State: