

5th IHO HSSC Meeting
Shanghai, China, 5-8 November 2013

Paper for Consideration by HSSC

Comments by Finland
to the Maintenance procedures of S-57 and S-52

Submitted by: Finland

Executive Summary: *The document includes comments to the maintenance procedures of S-57 and S-52*

Related Documents: 1. HSSC5-04.3A_Maintenance of S-57 and S-52

Related Projects: None

Introduction / Background

1. Finland supports the efforts to clear all "ECDIS anomalies".
2. However, in 2012 there was a case (dealing with omni-directional lights) where a Encoding Bulletin was published very quickly without full reference to S-57 sub-group or the Chair of DIPWG, even if it was noted to be a portrayal issue. This case has been described in more details in document TSMAD25-4.11.1A.
3. Finland had pointed out that the procedures and specifications for this kind of cases are insufficient and not clear.
4. This issue was briefly discussed at TSMAD26 and a draft amended procedures and wiring diagram was shown. Comments were asked from TSMAD members. Finland regrets not being able to forward its comments before this mainly due resource limitations.

Analysis / Discussion

Proposed procedures

5. It is not clear for which kind of cases these procedures are intended for. Is the intention that all new issues to S-57 will be processed with the proposed procedures, or only urgent ECDIS anomalies? In the related document it is stated that "*The wiring seems to allow fast track processing of non-safety issues while requiring a longer process for issuing EBs related to safety issues*". However in the proposed procedures there is not dealt anywhere if an issue is urgent or not.
6. If the issue is not urgent, then normal TSMAD procedures should be followed. In our understanding there are no problems with these normal procedures. The proposed procedure seems to follow in some extend these procedures.
7. Only for urgent safety-related issues (e.g. ECDIS anomalies) there should be a fast-track procedure. The proposed procedures and diagrams do not clarify this kind of urgent procedure. In contrary, it seems to complicate the process. In the related document it is stated that "*In the second case (safety issue), the EB is not supposed to be considered until a full review cycle*".

involving IHO member States and stakeholders has been completed and the analysed by TSMAD chair group." Obviously these procedures are not intended for urgent issues.

8. In our understanding, if an issue is regarded as a safety-related ECDIS anomaly (by TSMAD Chair Group/IHB), then the IHB should inform quickly Member states and Stakeholders about an issue and warn all about the consequences. This should be done before the S-57 sub-group is ready to distribute an EB. After a warning message has been launched there should not be hurry to release any substantial EBs within few days. The S-57 sub-group (and if necessary, the full TSMAD) should analyses the issue thoroughly and prepare well defined EB according to its established practice, but perhaps with shorter commenting periods.

9. There are some issues which need more careful specifications, e.g.:

- specify criteria/rules to regard an issue as "safety-related"
- specify criteria/rules to regard an issue as "urgent"
- specify criteria/rules to decide if an issue should be dealt as Encoding issue or as Portrayal issue, respectively ending up possible Encoding Bulletin or Portrayal Bulletin.
- even if TSMAD Chair Group regards issue as safety-related, then IHB may reject that
- The decision of regarding an issue as "safety-related" and "urgent" should be clearly taken and should be reasoned and documented.
- for urgent issues there are no clear rules for S-57 Sub-WG, e.g. how many commenting days are allowed for Sub-WG members, should the decision be by consensus within the Sub-WG? What to do if a consensus has not been achieved?
- The proposed wiring diagrams do not coincide exactly with the textual processes and include many unclear lines. The diagrams should be checked and clarified.

10. Finland proposes to return these maintenance procedures back to TSMAD for more thorough review and further preparations.

Formalising the S-57 Maintenance Sub Working Group

11. The S-57 Maintenance Sub-WG (noted as "S-57 sub-group" in document HSSC5-04.3A) has an important role in the proposed procedure. However it has not clearly specified, it has worked by established practice.

12. Finland proposes that the S-57 Maintenance Sub-WG will be formalised more clearly; to specify its Terms of reference, Rules of procedure and clarify its Membership.

Justification and Impacts

13. In order to avoid incorrect actions, clear procedures and specifications are needed for maintaining S-57 and S-52.

Action Required of HSSC

14. The HSSC5 meeting is invited to

- consider above remarks and
- return maintenance procedures back to TSMAD for more thorough review and further preparations
- task TSMAD to formalise S-57 Maintenance Sub-WG