

Hydrographic Services and Standards Committee

#### **Comments by Finland**

#### to the Maintenance procedures of S-57 and S-52

#### [HSSC5-04.3B]

# Introduction

- + Finland supports the efforts to clear all "ECDIS anomalies".
- However, in 2012 there was a case where an 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.
- + Finland had pointed out that the procedures and specifications for this kind of cases are insufficient and not clear
- Finland regrets not being able to forward our comments before this mainly due resource limitations. This is our last change to raise our concerns and ask clarifications before final approvals. We hope these are for the benefit for those HOs not participating to HSSC.



### Comments to proposed procedures

- + It is not clear for which kind of cases these proposed procedures are intended for
- + HSSC5-03.4A: "to allow for fast track processing of nonsafety issues while requiring a longer process for issuing EBs related to safety issues"
- In our opinion if an issue is not safety-related and not urgent, then normal TSMAD procedure should be followed.
- Only for urgent and safety-related issues there should be a fast-track procedure.



### "Normal" TSMAD procedure for EBs

"Based on "established practice", not clearly specified

- TSMAD CG initiate
- S-57 Sub-WG prepares temporary EB (if needed)
- TSMAD CG approves to release temporary EB
- S-57 Sub-WG prepares draft change of UOC
- TSMAD approves draft change of UOC
- HSSC approves draft change of UOC
- IHB seeks MS approval to draft change of UOC

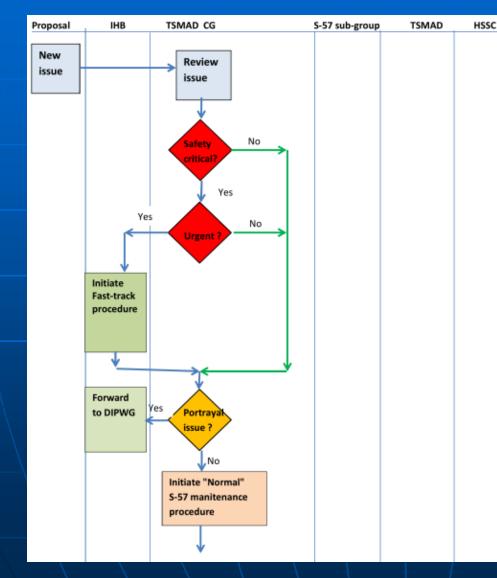


### Our understanding on "Fast-track procedure"

- As a quick response to critical ECDIS anomalies
- IHB to inform and to give a warning to all MSs and Stakeholders on the issue in order to prevent future additional dangerous situations (and if already available, may include also provisional proposed actions)
- This is an additional procedure that applies to urgent safetycritical issues
- This allows more time for analysing the issue and for preparing a carefully prepared EB (if needed)
- TSMAD simultaneously initiates "normal" procedure for preparing EB [and PB]



## Proposal to enhance S-57 maintenance procedure



Proposal to add in the beginning of the procedure these tests where the scope of the issue will be decided:

- 1. Safety-related?
- 2. Urgent?
- 3. Encoding or portrayal issue?

Same tests apply to S-52 maintenance procedure

### **Clarifications needed:**

#### HSSC to clarify and specify:

- + Rules to specify if an issue is urgent and safety-critical
- + Rules to specify if an issue is related to S-57 or S-52
- + The use of "Fast track procedure"
  - To be used for urgent and safety-critical issues



### Formalising the S-57 Maintenance Sub- Working Group

- 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".
- + Finland proposes that the S-57 Maintenance Sub-WG to be formalised more clearly; to specify its Terms of Reference, Rules of Procedure and clarify its Membership, i.e.:
  - membership and chair to be clearly decided by TSMAD [also for DIPWG]
  - decisions by consensus
  - if consensus is not achieved  $\rightarrow$  forward to full TSMAD
  - to specify time limits allowed for Sub-WG members to comment proposals



## Action requested of HSSC

- + consider these comments
- clarify the proposed principal issues for maintenance procedures
- task TSMAD and DIPWG to more thoroughly review the procedures
- task TSMAD to formalise S-57 Maintenance Sub-WG

