

**Paper for Consideration by HSSC  
T&P notices for ENC**

<b>Submitted by:</b>	INTERTANKO
<b>Executive Summary:</b>	T&P notices for ENCs. Discussion on the issue and proposal for a way forward
<b>Related Documents:</b>	IRCC8 report HSSC7-05.6C HSSC7-05.6B_WENDWG_REPORT WENDWG6-04.6K3 HSSC5-INF2 rev3 HSSC6-05.5D rev1 IRCC6-08B S-4(B-104, B-600, B-633.1, B-634.1) IHO circular letters 09/2011, 30/2011, 34/2013 and 08/2014 Final minutes of HSSC2 (section 5.10) Final minutes of HSSC3 (section 5.10 and action HSSC3/20) Final minutes of HSSC4 (section 3.B and action HSSC4/01) Doc. HSSC3-05.10A rev1 Publication S-57 Appendix B.1 Annex A - Use of the Object Catalogue for ENC - Clause 2.6.2 - Guidelines for encoding Temporary and Preliminary ENC Updates S-65 'ENC Production Guidance'
<b>Related Projects:</b>	N.A

## 1. Introduction / Background

The members of INTERTANKO have brought to our attention the difficulties they encounter applying T&P notices for ENCs in ECDIS systems. Members of INTERTANKO are facing an administrative burden in updating ENCs with T&Ps and great difficulties in recognising which T&Ps are included in ENC updates and which T&Ps are not included in chart updates. Also, there is a discrepancy in Marine Information Overlays (MIOs) such as Admiralty Information Overlay (AIO) in what T&Ps they publish.

## 2. Analysis/Discussion

### a. The issues at hand can briefly be categorized in the below bullet points:

- Not all Hydrographic Offices (HOs)/National authorities include the T&Ps they produce in their regular ENC updates
- Some ENC chart distributors produce Marine Information Overlays (MIO) (i.e AIO) which includes T&Ps available, but not all.
- There is a difference between the T&Ps produced by HOs for their ENCs and the T&Ps chart distributors produce independently for the same ENCs through MIO.
- There seems to be a lack of global definition and possibly classification of T&Ps in relation to what to include in ENC updates.

Below is a more detailed discussion of these issues.

### b. Not all HOs include the T&Ps they produce in their regular ENC updates

This issue has been on the agenda for the committee since HSSC2 and there is a continuous follow up on this, latest is the HSSC5-INF2 rev3. However, the problems associated with T&P updates are not widely known amongst seafarers and shipowners. So, although INTERTANKO is grateful that the issue is acknowledged and followed up by IHO the fact remains that it continues to be a problem to seafarers and shipowners around the world. INTERTANKO would like to take the opportunity to remind the committee that we today have a carriage

requirement of ECDIS onboard most commercial vessels around the world. It is therefore of outmost importance for the safety of shipping that we can trust our navigation equipment and for our charts to be up to date with the latest information available.

c. Some ENC chart distributors produce Marine Information Overlays (i.e AIO) which include T&Ps available, but not all.

Marine Information Overlays (MIOs) such as Admiralty Information Overlay are a good way to get around the issue of HOs not issuing T&Ps for ENC updates. However, today not all chart distributors have this option. Thus, we have a large variation in what the market offers to shipowners today. So, although the Admiralty Information Overlay exists, this is just one chart distributor amongst many. And most chart distributors do not include MIOs as a service.

d. There is a difference between the T&Ps produced by HOs for their ENCs and the T&Ps chart distributors produce independently for the same ENCs through MIO.

The Admiralty as an example of those chart distributors that publish Marine Information Overlays (MIOs) does not include all T&Ps issued by national HOs, or to put in a different way, the admiralty includes all the T&Ps it thinks are relevant to the Mariners.

In the presentation of paper IRCC6-08b, France makes the following comments:

- Not all T&P SHOM NtMs appear as AIOs
- Some AIOs don't correspond to SHOM NtMs
- Some AIOs are unnecessary, as ENCs they refer to are already updated
- Some AIOs refers to several ENCs, but some of them should not be concerned
- Some AIOs don't reproduce exhaustively NtMs from the producer

*They conclude:*

***“Although the objective of AIO is to improve the quality of ENCs for the interest of the navigator, the issues it can generate could create doubts on reliability of official charts and on the quality of IHO ENC service”***

This is a serious matter for the members of INTERTANKO and the comments correspond well with feedback given by INTERTANKO members.

This issue is further highlighted in HSSC7-05.6C by Sweden which states: *“We are concerned that duplicate, seemingly similar, products or services create confusion for the end user and we question the need for AIO for the area covered by Swedish ENCs.”*

The difference in opinion on T&Ps and AIO is made even clearer in the document HSSC7-05.6B where the admiralty advises that their MIO layer on ECDIS is perfectly safe and on the other hand a number of member states saying that the AIO layer cause confusion.

In the IRCC8 report a discussion on T&P took place and IRCC in decision 14 took a step forward to cover some of the issues discussed in this paper.

INTERTANKO recognises and are thankful to the Admiralty for providing the AIO service, but the fact remains that HOs are concerned about the service and this requires INTERTANKO members to have a full manual procedure in place to tackle this issue.

**e. There seems to be a lack of global definition and possibly classification of T&Ps and in relation to what to include in ENC updates.**

Although we do have standards and guidance on what T&Ps are and how they should be portrayed, specifically highlighted in the new edition of S-4 edition 4.6.0(B-104, B-600, B-633.1, B-634.1) we still seem to have a mismatch as can be seen from above discussion.

If we had a streamlined and fully standardized way of handling T&Ps, concerns raised in the papers HSSC7-05.6B, IRCC6-08b, HSSC7-05.6C and many more mentioned in the list of documents above would not exist.

#### **f. Input from HOs that do not include T&Ps in the ENC updates.**

INTERTANKO has been in contact with NOAA and The National Geospatial-Intelligence Agency (NGA) The reason for NOAA not including T&Ps in their ENC updates seems to be:

- NGA produces the official United States Notice to Mariner, and does not publish T and P notices for US waters – thus there is nothing to apply.
- The USCG publishes the Local Notice to Mariners and also publishes Temporary corrections to aids to navigations. NOAA inserts a note on ENCs and paper charts stating caution that they are not included.

However, The National Geospatial-Intelligence Agency (NGA) advises that they do include some T&Ps in their chart updates, but only those they consider vital to USCG.

NOAA has advised us that:

*“When it comes to following the IHO guidance for traffic separation scheme changes, where it states that a T and P notice be published informing the public of the changes – we do indeed follow that practice, except we publish the notice in the general section and then follow the applicable guidance to release the information into our ENC prior to the start of the IMO mandated change.*

*In addition, we publish on a weekly basis via the ENC update mechanism the changes that are published in the chart correction section, the light list section and the general notice section (if they are applicable). This is done for both the NGA notice and the USCG LNM.”*

This gives at hand that the US authorities do include some T&Ps in their NtM and ENC updates, but they do not call them T&Ps

### **3. Conclusions**

As can be clearly seen from the above, this is a complex matter and a longstanding issue on IHOs agenda in many various committees and Working Groups.

The impact on the shipping industry is not negligible. Our members face Port State Control officers and vetting inspectors coming onboard to ensure that the ECDIS systems have up to date charts.

Our members have at present manual procedures to deal with the above. However, as can be understood, this is a time consuming detective work. In addition, updating ENCs manually is much more time consuming than correcting paper charts.

However, the most important impact has to do with the safety of navigation of the vessels worldwide as this confusion about T&Ps might lead to a vessel missing an important notice which in turn could lead to a serious accident.

### **4. Recommendations**

We recommend that HSSC forward this issue to the relevant working group. This Working Group should be tasked with:

Although the IRCC8 report, decision 14; do point in a somewhat similar approach as proposed below. However, INTERTANKO proposes a stepwise approach and a more collaborative approach to this issue. Also, there is most probably a need to update standards and guidelines for T&Ps.

#### **a. Seek clarification from all member states/HOs on their interpretation of the current standards, recommendations and guidelines for T&Ps and ask them to give their reasons for:**

- Why they do, or do not include T&Ps in ENCs.
- What type T notices do each member state consider relevant to add to ENC updates? What type T notices do each member state consider not relevant to add to ENC updates and thus should be excluded? Member states that currently do not include T notices should also be encouraged to answer.
- What type P notices do each member state consider relevant to add to ENC updates? What type P notices do each member state consider not relevant to add to ENC updates and thus should be excluded? Member states that currently do not include P notices should also be encouraged to answer.

- Ask for their view on the current standards, recommendations and guidelines for T&Ps and ask them to give their view on way forward in order to find a global solution.

**b. Gather responses from the member states and propose changes to the current standards, recommendations and guidelines for T&Ps as needed.**

The working Group should try to find a consensus within the group in order to support the industry that uses the ENC's on a way forward. There might be a need to make a new guideline and possibly classify T&P notices for those to be added in ENC's and those that should not. It is further important that the issue of MIO's is dealt with in a consistent manner.

**c. Find a short term, medium term and a long term solution to support the industry.**

It is of utmost importance to the industry that this is not postponed to future standards. This is something that needs to be tackled and solved as soon as possible.

**Short term solution:**

Together with the shipping industry produce a guideline on how to apply T&P notices in a consistent way, noting the differences in interpretation of T&Ps among HO's and Chart distributors issuing MIO's.

**Medium term solution:**

Update the current standards or, if needed, write new guidelines on how to include T&Ps in ENC updates and how to deal with chart producers issuing MIO layers.

**Long term solution:**

HSSC7 decided to forward the issue as raised in HSSC7-05.6C to the S-100 WG for consideration. However, taken the above into account, there may be a need to amend the instructions to the S-100 WG in the future.

Related to these above recommendations, INTERTANKO is of the view that the recommendations raised by some member states in WENDWG6-04.6K3-Proposal for AIO, should not be considered until the underlying issues as described in this document have been addressed.

**Action Required of HSSC**

The HSSC is invited to consider the issues raised in this paper and decide as appropriate.