

Documents reviewed from http://www.iho.int/mtg_docs/com_wg/S-100WG/S-121PT/S-121PT.htm

1	2	(3)	4	5	(6)	(7)	
Component	CO ¹	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/Table/ Note (e.g. Table 1)	Type of comment ²	Comment (justification for change) by the CO ³	Proposed change by the CO	Secretariat observations on each comment submitted
S121 MLB PS 1.0.0 20 Mar 19	GB	1.5 Abstract	Second sentence	ed	Not all marine areas are covered in UNCLOS or in S121.	"...the geographic extents of <i>some</i> marine areas ..."	
	GB	4.1	Table 44-1	ed	Numbering of title of table	Table 4-1	
	GB	6.4.1	3 rd para, 2 nd sentence	ed	Validity of cartographic data	"...makers but (<i>except where the cartographic document is a legal document in its own right</i>) are inadequate ..."	
	GB	7	1st para, 1 st sentence	ed	"form " to "from"	" acquired <i>from</i> multiple ..."	
	GB	8	1 st para, 2 nd sentence	ed	Data may be revised, it won't necessarily be better, just the appropriate data at that time.	"...availability of new, <i>revised</i> or better data."	
	GB	8.2	2 nd sentence	ed	States can delegate the work (possibly not delegate the responsibility) therefore pedantic. Producers may use S121 without being the authoritative body.	"... implements S-121 <i>may</i> be responsible for its own data sources ,...."	
	GB	9	1st para, 2 nd sentence	ed	Can be used onto hard copy where domains and portrayal may predate current standardisation	" ..or other appropriate symbology."	
	GB	9	2 nd para	ge	UNCLOS allows for graphic deposit Art. 16, 75, 84	At end "Also deposited may be <i>graphic deposit recognised within UNCLOS Article 16, 75, 84.</i> "	
	GB	10	2) 1 st sentence	ge	S121 is not necessarily the only approved declaration form, that is up to States legislation.	"Data is provided as <i>one possible</i> official legal declaration ..."	
	GB	A.4	Table List of allowed ... row 2	ge	May not be fully populated	"Features and Attributes required ..."	
	GB	B.2	#1 Note	ed	I don't understand		

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	GB	B.2	#2 Output	ed	Considering some legal documents may need additional information and documents	“that can be used to verify the correctness <i>and elaborate the material</i> in legal proceedings.”	
	GB	B.2	#2 Primary Actors	ed	Legal proceedings and deposit are separate matters	“Legal proceedings. Deposit in compliance with ...”	
	GB	B.2	#2 Activity and useage	ed	Legal proceedings and deposit are separate matters	“Legal proceedings. Deposit in compliance with ...”	
	GB	B.2	#2 Note	ed	Elaborate	“... related security, <i>data and validity</i> needs to be maintained.”	
	GB	C2.4	2 nd para 2 nd sentence	ed	Typographic? than that	“...reference system different <i>from</i> that used ...”	
	GB	C2.6	Sub-section	ge	Applicability of concept: Some States may choose to use a limited application of the standard to augment the publication of maritime limits. Due to the jurisdictional organisation and infrastructure of some states they may opt to publish lightly linked datasets or features only with minimum attribution.		
S121 MLB PS Annex A DCE G 1.0.0 20 Mar 19	GB	Table of Contents	State Specific Objects	ed	Straight is “Strait”. See spelling Part III UNCLOS	“Strait”	
	GB	Feature Types	Baseline Point	te	Baseline point may also be relevant for the Art.76.4 outer continental shelf definition as a point, as outer limit of the continental shelf further down includes the outer continental shelf elements.	“A baseline point is a point on (i) a baseline from which the breadths of the territorial sea, contiguous zone, exclusive economic zone , and	

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						continental shelf are measured, or (ii) on an archipelagic baseline.”	
	GB	Feature Types	Boundary Point	te	Definition is to a point between two States (separate sovereign entities), for those States that are federated, would they not also wish to use S121 and have the option of defining boundary points and lines (line which is already in 4.2.10)?	Instead of “States” use “entities” as for boundary.	
	GB	Feature Types	Baseline	te	A baseline may also be relevant for the Art.76.4 outer continental shelf definition	Delete “(up to 200 nautical miles)”	
	GB	Feature Types	Normal Baseline	te	Art. 11 also relevant as includes harbour works and excludes artificial islands	“Normal Baseline (Articles 5, 6, 11 and 13 of UNCLOS) New (iii) For the purpose of delimiting the territorial sea, the outermost permanent harbour works which form an integral part of the harbour system are regarded as forming part of the coast. Off-shore installations and artificial islands shall not be considered as permanent harbour works.” (iii) to become (iv)	
	GB	Feature Types	Straight Baseline	te	I appreciate that after several turns round the block straight baselines and closing lines are being combined even though some States treat Art. 7 separately from Art. 9 and Art. 10. The definition sentence relates to straight baselines but the article references and the combined sub paragraphs are straight baselines and closing lines.	Definition sentence add: “straight baseline turning points ² . Also under defined circumstances a baseline may be drawn across the mouth of a river or bay. According to UNCLOS: “	
	GB	Feature Types	Baselines page 6	Query	Normal baseline components were listed under normal baseline the separately listed below. Straight and closing baseline components were listed under straight baseline and separately listed below. Is this to facilitate all different approaches?		

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	GB	Feature Types	Outer Limit of the Territorial Sea	te	This definition references boundary so suggest include delimitation article	“(Articles 3, 4 and 15 of UNCLOS)”	
	GB	Feature Types	Outer Limit of the Exclusive Economic Zone	te	This definition references boundary so suggest include delimitation article	“(Articles 57 and 74 of UNCLOS)”	
	GB	Feature Types	Outer Limit of the Continental Shelf	te	It is possible that delimitation and boundaries will apply here as for the exclusive economic zone so suggest include reference to delimitation article	“(Articles 76 and 83 of UNCLOS)”	
	GB	Feature Types	State Specific features page 8	ed	Revision of spelling	“Strait”	
	GB	Feature Types	State Specific features page 8	te	As an impact on passage and exercise of jurisdiction suggest reference to UNCLOS Part III although this does not include a geographic definition of feature but Art. 35 (c) straits may include co-ordinated definitions, and some States have legislation defining limits of straits and jurisdiction. Although the reference may not apply for straits that are not used for international navigation.		
	GB	Figure 5 MLB Zone Objects and Attributes	State Specific Objects	ed	Revision of spelling	“Strait”	
	GB	Figure 75 MLB Zone	State Specific Feature	ed	Revision of spelling	“Strait”	

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		Objects and Attributes	Objects and Attributes				
	GB	4.1.2	Baseline Point	ed	A baseline may also be relevant for the Art.76.4 outer continental shelf definition	Delete "(up to 200 nautical miles)"	
	GB	4.1.3	Boundary Point	ed	Definition is to a point between two States (separate sovereign entities), for those States that are federated, would they not also wish to use S121 and have the option of defining boundary points and lines?	Instead of "States" use "entities" as for boundary.	
	GB	4.2.3	Straight Baseline Reference	ed	Reference: if we have UNCLOS articles elsewhere for reference could we also have UNCLOS articles here.	"UNCLOS: Article 7"	
	GB	4.2.12	Outer Limit of the Territorial Sea Reference	ed	As the definition included reference to delimitation and the UNCLOS article, should the UNCLOS article be added here.	"UNCLOS: Articles 3, 4 and 15"	
	GB	4.2.14	Outer Limit of the Exclusive Economic Zone Reference	ed	As the definition included reference to delimitation and the UNCLOS article, should the UNCLOS article be added here	"UNCLOS: Articles 57 and 74"	
	GB	4.2.15	Outer Limit of the Continental Shelf Reference	ed	As the definition included reference to delimitation and the UNCLOS article, should the UNCLOS article be added here	"UNCLOS: Articles 76 and 83"	
	GB	4.2.16	Outer Limit of the Exclusive	ed	Is this a mirror of 4.2.14?	Delete?	

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			Economic Zone				
	GB	4.5.7	Straight	ed	Spelling	“Strait”	
	GB	4.5.7	Reference	ed	As an impact on passage and exercise of jurisdiction suggest reference to UNCLOS Part III although this does not include a geographic definition of feature but Art. 35 (c) straits may include co-ordinated definitions, and some States have legislation defining limits of straits and jurisdiction. Although the reference may not apply for straits that are not used for international navigation.	“UNCLOS: Part III”	
	GB	4.7	S-121 Attributes	ge	Not all States will populate all attributes due to different spatial administration models.		
	GB	4.10.1.2	Definition	ed	Spelling?	“interested”	
	GB	4.10.1.3	Definition	ed	Spelling?	“interested”	
	GB	4.10.11.1	Definition	ed	A great circle is the shortest distance across a sphere, a geodesic is the shortest distance along the surface of an ellipsoid. They are different in definition.	Delete “, namely a segment of a great circle.”	
	GB	4.10.15.5	Definition	ed	Duplication?	Only one “natural person”	
	GB	4.10.16	Party Group Type List	ed	Additional. “Condominium” as in Gulf of Fonseca case?		
	GB	4.10.18.2	Definition	ed	Need legal confirmation. Is sovereign right the “right of exclusive jurisdiction for specific subjects only.		
	GB	4.10.18.4	Definition	ed	Need legal confirmation for international public law: this is only one element of easement.		
	GB	4.10.18.4	Name and Definition	ed	Need legal confirmation; should this be servitude in public international law?		

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S121 MLB PS Anne x B Enco ding 1.0.0 20 Mar 19	GB	3	Third para	ed	Section 2 doesn't list a Use Case 1.1 and 1.2	"... Use Case 1 ..."	
	GB	3.1.2	Fifth para	ed	If there is to be a MLB based AML then the specification and approval process is through IHO and NATO. It would also require WECDIS type approval.	"An AML concept MLB could be a small subset of the elements and relations that may exist in an S-121 compliant MLB database to be used to augment data available for deployed maritime administration."	
	GB	3.2.1	Fifth para Eighth sentence	ed	Spelling "liited" and "hart"?		
	GB	3.2.1	Last but one para. Last sentence	ed	Spelling "there"	"their"	
	GB	3.2.2	Second para. Second sentence	ed	Capitalisation	"The difference is that a nation is free ..."	
	GB	3.2.2	Second para. Last sentence	ed	Possessive and missing word	"... to support a <i>nation's</i> custom data may have some differences <i>from</i> the software ..."	
	GB	5	Second para	ed	Use case 2.1 and 2.2 itemised in Section 2	"... For Use Case 2 many of these ..."	

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	GB	5.3.4	Third para. Third sentence	ed	Referencing	“ ...The structure of a Block Descriptor Record is illustrated in Figure 11. ...”	
	GB	5.3.6	Figure title	ed	Numbering	“Figure 13 – Table Structure”	
	GB	5.5.3, 5.5.4, 5.5.4.1, 5.5.4.2, 5.5.4.2	Rights Restrictions and Responsibilities Block	ge	Logic query. BAUnitBlock is optional, but the Rights Restrictions and Responsibilities blocks have Mandatory fields. Does that mean that if the BAUnitBlock optional rights responsibilities and restrictions are populated, then the blocks are applied and then they have mandatory fields? But, if the BAUnitBlock optional rights responsibilities and restrictions are not taken up then the Rights Responsibilities and Restrictions Blocks are not applied so their mandatory fields are not populated. Is it a conditional mandation?		
	GB	5.5.4.1	Restrictions Block	ed	Numbering	5.5.4.2	
	GB	5.5.4.2	Responsibilities Block	ed	Numbering	5.5.4.3	
	GB	5.5.5, 5.5.5.1, 5.5.5.2	Party Group Block and Party Block	ge	Logic query same concept as for Rights Restrictions and Responsibilities and flow down of optional and mandatory.		
	GB	5.5.6.1	Location Block legalsStatus Type	te	As use cases identified the development of non-depository datasets so if we may be developing a non-national dataset there may be scenarios when we would like “unknown”. There are States when the communication across the executive is not as fluent as maybe expected for open government so an “unknown” may be a viable option when the legislature and the geographic executive are separated. Can more than one of the list be used concurrently?	“- unknown”	

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	GB	5.5.6.1	Location Block locationObjectType	te	For a national database that provides all the spatial maritime zones data with associated information is there the need for a State-specific object. For instance, where a State has considered that a feature is Art. 121.3 what is the facility to record it as such.	"-Specific Point"	
	GB	5.5.6.2	Limit Block legalStatusType	te	As use cases identified the development of non-depository datasets so if we may be developing a non-national dataset there may be scenarios when we would like "unknown". There are States when the communication across the executive is not as fluent as maybe expected for open government so an "unknown" may be a viable option when the legislature and the geographic executive are separated. Can more than one of the list be used concurrently?	"- unknown"	
	GB	5.5.6.2	Limit Block limitObjectType	te	Inclusion of State-specific limit? Inclusion of Strait (for instance those that are defined to co-ordinates in legislation or treaties).	"-State-specific limit" "- Strait"	
	GB	5.5.6.2	Limit Block arcgeometryType	te	Some older legislation and treaties are silent on the applicable geometry. It may be inferred from hermeneutics or drafting papers but that is still inference rather than assurance. Is it in the quality coding that reference is made to inference and lack of assurance?		
	GB	5.5.6.3	Zone Block legalStatusType	te	As use cases identified the development of non-depository datasets so if we may be developing a non-national dataset there may be scenarios when we would like "unknown". There are States when the communication across the executive is not as fluent as maybe expected for open government so an "unknown" may be a viable option when the	"- unknown"	

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					legislature and the geographic executive are separated. Can more than one of the list be used concurrently?		
	GB	5.5.6.3	Zone Block zoneObjectT ype	te	Inclusion of zone from State-specific limit? Inclusion of Strait (for instance those that are defined to co-ordinates in legislation or treaties). Building on from the Limit Block limitObjectType should there also be objects for Low-Tide Elevations (and the onwads facility to identify if they are more than 12M from the baseline of a land or island so not entitled to generate maritime zones. Reef By this logic Ports should be included as an zone, but would this be confused with other S10X developments to model port spatial aspects and baselines Art. 11 are not the same as Port Limits when they are established by instrument. S211 doesn't seem to have the remit that would include port limits and baselines for maritime limits. Article 234: Ice covered areas. Not covered in S121 web conferences and development work so perhaps a subject for after v1.0. A specifically defined area but (as for straits) not precisely geographically defined, therefore no limits and baselines associated in generic definitions. Some States have relevant legislation, do they want to propose on this? Is this covered in S411	"-State-specific limit" "- Strait" "- Reef" "- Port generating baseline" "- Ice-Covered Areas"	
	GB	Appendix A	LegalStatusT ype Figure A2 Figure A4 Figure A5	te	As use cases identified the development of non-depository datasets so if we may be developing a non-national dataset there may be scenarios when we would like "unknown". There are States when the communication across the executive is not as fluent as maybe expected for open government so an	"- unknown"	

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			Figure A6		“unknown” may be a viable option when the legislature and the geographic executive are separated. Can more than one of the list be used concurrently?		
	GB	Appendix A	Figure A4 Object locationType (?)	te	For a national database that provides all the spatial maritime zones data with associated information is there the need for a State-specific object. For instance, where a State has considered that a feature is Art. 121.3 what is the facility to record it as such.	“-Specific Point”	
	GB	Appendix A	Figure A5 ObjectlimitType (?)	te	Inclusion of State-specific limit? Inclusion of Strait (for instance those that are defined to co-ordinates in legislation or treaties).	“-State-specific limit” “- Strait”	
	GB	Appendix A	Figure A5 arcgeometry Type (?)	te	Some older legislation and treaties are silent on the applicable geometry. It may be inferred from hermeneutics or drafting papers but that is still inference rather than assurance. Is it in the quality coding that reference is made to inference and lack of assurance?		
	GB	Appendix A	Figure A6 zoneObject (?)	te	Inclusion of zone associated with State-specific limit? Inclusion of Strait (for instance those that are defined to co-ordinates in legislation or treaties). Building on from the Limit Block limitObjectType should there also be objects for Low-Tide Elevations (and the onwards facility to identify if they are more than 12M from the baseline of a land or island so not entitled to generate maritime zones. Reef By this logic Ports should be included as an zone, but would this be confused with other S10X developments to model port spatial aspects and baselines Art. 11 are not the same as Port Limits when they are established by instrument. S211 doesn't seem to	“-State-specific limit” “- Strait” “- Reef” “- Port generating baseline” “- Ice-Covered Areas”	

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					have the remit that would include port limits and baselines for maritime limits. Article 234: Ice covered areas. Not covered in S121 web conferences and development work so perhaps a subject for after v1.0. A specifically defined area but (as for straits) not precisely geographically defined, therefore no limits and baselines associated in generic definitions. Some States have relevant legislation, do they want to propose on this? Is this covered in S411		
	GB	Appendix D	D.2 Subsequent Records	ge	Appreciating that this is an explicit modelling of standards data and format of modern legal and standards status. However, some States may not choose to elaborate their deposits when the deposits are defined more narrowly in UNCLOS.	Reconsider number of mandatory obligations.	
	GB	Appendix D	D8.1 D11.1 D12.1 LegalStatus Type	ge	If “unknown” is included in other implementations then it should be considered here even though if these are used for deposit the status will at least be “lodged”. Can more than one of the list be used concurrently?		
	GB	Appendix D	D11.1 arcGeometry Type	ed	If a State is refreshing its deposit but has not refreshed the legislation, older legislation may not have defined geometry so it may be inferred or assumed. To avoid a deposit specifying more than in the legal original propose “unknown”.	“- Unknown”	
S121 MLB PS Annex F	GB	3.2 Feature and Attribute Structure	Second para. Second sentence	ed	Marine limits and Boundaries and Cadastre are being used as common nouns not proper nouns	“... such as marine limits and boundaries, cadastre, resource ...”	
	GB	3.2.3 Spatial Attribute	First para under Figure	ed	Marine Cadastre is being used as a common noun, not a proper noun.	“...and in a marine cadastre.”	

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			9. Second sentence				

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