

DEVELOPMENT OF AN E-NAVIGATION STRATEGY IMPLEMENTATION PLAN

Comments on the Report of the Correspondence group on e-navigation to COMSAR 16

Submitted by Republic of Liberia, Republic of the Marshall Islands, International Chamber of Shipping (ICS), BIMCO, Cruise Line International Association (CLIA), GlobalMET, International Maritime Pilot's Association (IMPA), Intercargo, Intertanko, International Federation of Shipmasters' Associations (IFSMA), International Parcel Tankers Association (IPTA) and International Transport Workers' Federation (ITF)

SUMMARY

<i>Executive summary:</i>	This document comments on the report of the Correspondence Group (CG) on e-navigation (COMSAR 16/11) and on the CG discussion regarding the future of AIS. Comment by the CG that the human element should receive careful consideration during the development of an e-navigation strategy is supported.
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.6
<i>Planned output:</i>	5.2.6.1
<i>Action to be taken:</i>	Paragraph 10
<i>Related documents:</i>	COMSAR 16/11

1. This document comments on COMSAR 16/11 and is submitted in accordance with the provisions of paragraph 6.12.5 of MSC-MEPC.1/Circ.4 on '*Guidelines on the Organization and Method of Work of the Maritime Safety Committee and the Marine Environment Protection Committee and their Subsidiary Bodies*'

Introduction

2. The co-sponsors provide comment on the report of the e-navigation Correspondence Group (CG), in particular regarding the future of AIS. Paragraph 58.4 of COMSAR 16/11 invites the Sub-Committee to "*give its view on the next generation AIS and to advise on the further process to be undertaken*".

3. The co-sponsors also note and agree that the human element should remain prominent in any discussion on the development of e-navigation.

AIS (Next generation)

4. The co-sponsors note that there was significant discussion in the CG and in the report to COMSAR 16, regarding AIS use in e-navigation. The report contains an implicit assumption that there will be a next generation AIS. In paragraph 25 of COMSAR 16/11 it is stated that, '*AIS (Next generation) represents one of the main elements of the e-navigation concept*'. Concern is expressed that the CG appears to have accepted a requirement for the development of a new AIS, before appropriate discussion of the matter has taken place at IMO.

Compelling need

5. Consideration of a possible next generation AIS by the CG, is considered to be premature. Prior to such discussion there should first be a demonstration of compelling need through appropriate IMO instruments. The co-sponsors are unaware that IMO has received any suggestion that existing AIS equipment fails to meet the relevant performance standards. Should a future need be identified and agreed by IMO that is outside the scope of the existing AIS, consideration should then be given to developing a new or amended performance standard.

The Human Element

6. The co-sponsors note that throughout discussions by the CG and its report there are many references confirming that the human element should remain prominent during consideration of e-navigation.

7. ICS *et al* advised the CG that any new equipment should be intuitive and user friendly to operate. The Gap Analysis document does not reflect this approach, instead a significant number of new or extended training requirements for existing and proposed navigation equipment or systems are identified. The co-sponsors have serious concern that if this approach to training requirements is pursued much of the potential benefit to shipping associated with e-navigation will not be realised.

8. Regarding paragraphs 25 to 32 of document COMSAR 16/11 the co-sponsors note the implicit requirement for a new generation AIS and consider the action requested by the CG in paragraph 58.4 of COMSAR 16/11 to be premature.

9. The co-sponsors express concern that despite statements in COMSAR 16/11 highlighting the importance of the Human Element to any e-navigation discussions, this appears not to have occurred in all cases. In particular the 'Gap Analysis' (Annex I) includes prescriptive training requirements that do not reflect 'user friendly' and 'innovative' approaches which are widely accepted as being integral to the e-navigation process.

Action requested of the Committee

10. The Sub-Committee is requested to take action as appropriate.