

14th CHRIS Meeting, Shanghai, China, 15-17 August 2002

ENC DISTRIBUTION PROCESS – CONCERN FROM THE SHIPPING COMMUNITY

Letter dated 24 June 2002, from SEATRADE (Netherlands) to the IHB

Dear Sirs,

In view of the recent development in regards to ENC distribution and the split of Primar into separate entities – PRIMAR STAVANGER and IC-ENC, the shipping community is concerned that the distribution process could become even more complicated than what it is now

As ship owners, we have been slow in adopting the official ENC's because of a number of issues which are still outstanding.

1. The coverage in S-57 format provide by hydrographic offices is very limited, in spite of improvement the coverage needs to be improved.
2. Private data providers are actively promoting their own data product in direct competition with official HO's, in as much we see the benefits of the technology, there has been a clear definition in regards what can be used legally to comply with ECDIS regulations.
3. Hydrographic offices of various countries, either directly or in partnership with strategic partners; provide their data in various formats – S-57, HRCF, BSB, PSX or other.
4. The profusion of different formats makes it difficult for system manufacturers to adapt. System manufacturers are reluctant to adapt their ECDIS to read a wide range of formats because of costs involved in gaining type approval.
5. The prices of ENC's. Some ship owners are subscribing to the services of private data providers because they feel that their national authorities are taking a long time to define a transitional process to reduce the paper chart carriage requirements; this despite a transitional process to reduce the paper chart carriage requirements; this despite IMO having already given approval to use Official Raster data within ECDIS. ARCS and other formats are indeed providing a respectable coverage. This decision is sometime taken without appropriate knowledge of the legal consequences.
6. Some system manufacturers give the impression that they want to control the entire process on their own. Chart distributors have been either slow or have been left out of the process to distribute ENC's. We view them as valued and trusted partners that would benefit the process of they wanted to be; and could be involved.

In view of the above points, we respectfully urge to consider the following recommendations:

1. We recommend that IHO seeks to adopt a common S-57 encryption standard which will be freely available to all RENC's and their authorized distributors and individual HO's. it took a long time for systems manufacturers to adopt the PRIMAR scheme; which by the way may not work for other RENC's, it only works with the PRIMAR signature. A proliferation of encryption will further delay the wide acceptance and use of official ENC's. Our trading partners require us to us a variety of formats and at this time our ability to order official ENC's somewhat depends on the system manufacturer's ability and willingness to adopt the

new encryption. This willingness and ability may be related to the difficulty and costs in obtaining type approval.

2. Now that SENC format delivery has been approved, we are concerned that it will be difficult to differentiate between "official" and "un-official" data, rules must be adopted to separate them.
3. SENC delivery will become a de-facto procedure for many, should the system provider not survive due to financial difficulties, the equipment could become useless. It is primordial that delivery in S-57 format remains an ECDIS requirement.
4. There should be coordination and cooperation with the various national authorities to encourage them to adopt a consistent approach to the application of IMO regulations in relation to the use of ECDIS in place of paper charts, this process should start as soon as possible. In this regard the MCA has published MGN 133 and MGN 194 which could be a useful document to many.

Because of the lack of closure and final agreement in regards to International and National regulations, the development and implementation of electronic charting technology has been on the table for many years; it is time to settle the matter. If other issues such as AIS have been resolved and agreed in far less time there is no reason why the issue of ECDIS implementation should not be solved rapidly.

Best regards
Seatrade, Groningen B.V.

K.-H. Hilbig, Managing Director
E-mail: postmaster@seatrade.nl
