

**2nd Meeting of the IHO Council – C-2  
9 - 11 October 2018, London, United Kingdom**

**Comment on IRCC report to C-2  
Application of the IHO Resolution 1/2018 (IHO CL 19/2018)**

<b>Submitted by:</b>	France
<b>Related Documents:</b>	1/ IHO resolution 1/2018 2/ Updated S-11 – Part A: Section 200 (Edition 3.1.0) / Preparation and Maintenance of ENC Schemes 3/ IRCC report to C-2 (C2-4A)

<b>Executive Summary:</b>	IRCC report (ref. 3 - §.10) raised some concern on the full implementation of the WEND principles regarding the overlapping issue. France suggests that a feedback of the application of IHO resolution 1/2018 a few months after its entry into force is needed to assess its efficiency and possibly improve its implementation.
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### **Background**

1. Although not allowed by the WEND rules (ref. 2) ENC overlaps are regularly highlighted by RENCs.
2. Cases of unpredictable behavior of ECDIS have been reported in these overlaps which may cause risks for navigation without any consideration of navigational significance of the overlap from the sole charting point of view.
3. An IHO resolution on the elimination of overlapping ENC data in areas of demonstrable risk to the safety of navigation has been adopted on 15<sup>th</sup> February 2018 by circular letter 19/2018 (ref. 1).

### **Discussion**

4. The implementation of IHO resolution 1/2018 raised some difficulties at ICC meetings which were reported at WENDWG-8 and IRCC-10.
5. One difficulty lies in the agreement on prioritization of risks which is not reached between the ENC producers in several cases. This may prevent the full implementation of the resolution in particular when there is no agreement on which overlaps have to be processed within one year.

### **Analysis**

6. France considers that:
7. In regions where the use of ENC on ECDIS are a key for safety of navigation, ENC overlapping is a risk due to the unpredictability of ECDIS in such situations ;
8. As a consequence, once such risks have been identified they must be eliminated ;
9. The criticality of the risks should only be used as an indication of priority for handling overlaps ;
10. As soon as an overlap is identified by a RENC, an initial criticality assessment is made ;
11. It is the responsibility of ENC producers to eliminate all overlaps as quickly as possible and at the latest within one year after a RENC has identified an overlap, in descending order of criticality, based on their own assessment which may be different from the initial RENC assessment ;
12. In case of a divergence between two ENC producers regarding overlap criticality, the highest criticality should be retained.

### **Recommendations**

13. France proposes that IRCC:

- a. **Draws up an assessment** within one year of the effectiveness of the application of the resolution 1/2018 including an analysis of the uniformity of its application in the different regional committees ;
- b. **Eventually formulates proposals** to improve the efficiency of its implementation.

**Actions required of the Council**

14. The Council is invited to :

- a. **Endorse** the proposed recommendation; and
- b. **Instruct** the IRCC consequently.