European Maritime Safety Agency

4th Meeting Report

SSN IFCD drafting Working Group

Held in Lisbon on

1 March 2011

Background

The decision for setting up the IFCD drafting Working Group (IFCD WG) was taken at the SSN Workshop 14 with the objective to draft the IFCD taking into account the existing ICD version of 2006 and the further developments of SSN. The draft document should be submitted to the SSN Group and the SSN HLSG.

The working group is constituted by delegations from: **Finland, France, Germany, Ireland, Latvia, Poland, Portugal, Sweden, the Netherlands and the UK**. In addition, **Bulgaria, Lithuania** and **Italy** also participated in this specific meeting.

Mr Michele Avino represented the European Commission (DG MOVE), replacing Mr Jean-Bernard Erhardt. The meeting was opened by Ms Helena Ramón Jarraud (EMSA/C2) and chaired by Ms Marta Lima (EMSA/C2). Ms Lorena Amigo López and Mr Yann Le Moan of Unit C2 also attended on behalf of EMSA.

The list of participants is attached in **Annex 1** and the meeting agenda in **Annex 2**.

Note: the meeting documentation may be obtained from:

https://extranet.emsa.europa.eu/index.php?option=com_joomdoc&task=cat_view&gid=267&Itemid=121

Meeting Programme

1. Opening / Introduction (EMSA and COM-DG MOVE)

EMSA welcomed the participants and introduced the new COM representative Mr Michele Avino (DG MOVE). Special words of thanks were expressed to Mr Jean-Bernard Erhardt for his work in the SSN group and IFCD working group.

The main objectives of this fourth meeting were underlined to finalise the review of the references to:

- the LRIT information management in SSN and
- of Chapter 7 "System Security"

Following the 4th meeting the working group should continue to work by correspondence if needed to finalise the draft to be presented at the next SSN workshop 17 (May 2012) for validation.

The Commission thanked the participants for their effort and commitment.

2. Approval of the agenda

The agenda was approved.

3. Work plan

EMSA presented the current status of the IFCD WG work plan.

The new draft IFCD revised by the IFCD WG will be presented to SSN workshop 17 (May 2012). Following the SSN group validation, the draft will be submitted to the HLSG 7 (June 2012) for analysis and approval at the subsequent meeting (HLSG 8).

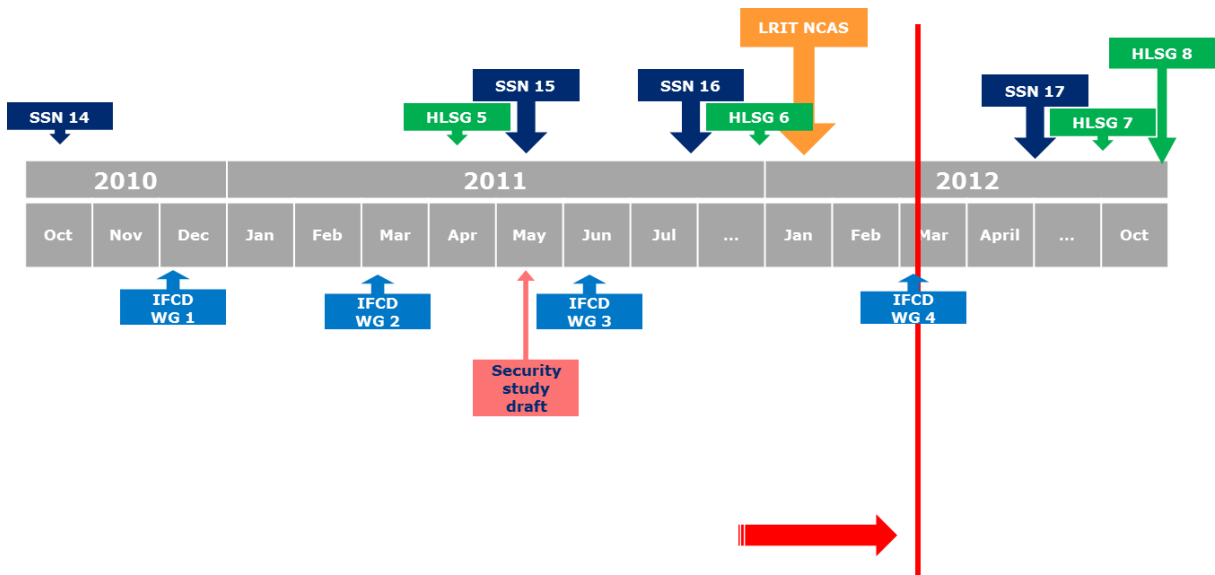Figure 1 illustrates the current time plan:

Figure 1 – Work plan IFCD WG

4. Review of actions following SSN workshop 16 and HLSG 6

EMSA presented the follow-up actions of the SSN 16 and HLSG 6 (see Table 1). The IFCD WG was requested to consider the guidance of the HLSG (in particular regarding chapter 7 - Security study) and make the necessary changes to the draft IFCD.

SSN workshop 16 (October 2011) outcome	
1	The IFCD draft Chapters 1, 2, 4, 5 and 6 were agreed. Germany, Ireland and the Netherlands reserved their position on the following items: ▪ AIS Regional Servers as part of the Central SSN system (Germany) ▪ SSN Graphical Interface as one of the alternative mechanisms for the exchange of information (Ireland) ▪ Performance indicator for the Time for request/response (the Netherlands)
2	The draft Chapter 3 was agreed with: ▪ A mandate given to EMSA to review the draft proposal regarding the distribution of LRIT information through SSN ▪ A comment made by the UK on the access rights to Incident Reports by ports (which was inserted in the IFCD draft)
3	Draft Chapter 7 was not included in the draft IFCD to be submitted to the HLSG 6
SSN HLSG 6 (December 2011) outcome	
1	IFCD Draft V.10 presented for information (progress report)
2	No decision was taken about IFCD Chapters (including the reservation points) agreed at SSN 16. Discussions will continue at the HLSG 7
3	Regarding the LRIT references in the IFCD, EMSA announced that it plans to consult the LRIT NCAs group to improve the references to LRIT information. This draft would be reviewed by IFCD drafting WG and SSN group in order to integrate them in an updated version of the IFCD.
4	The main results of the SSN Security study were discussed and the HLSG agreed the following: ▪ The **Baseline security requirements** in the IFCD should be mandatory for

the central SSN system and its interface with the NCA and voluntary for local systems.

- The security of local systems is the responsibility of national competent authorities (NCAs) and of ports.
- **Authentication and traceability:** MS do not see any benefit to change the protocol (to identify the originators and providers in the message) as they should be trusted to control those who send messages on their behalf.

The traceability shall be ensured within the national systems and in case of request this information should be communicated to the requestor

Table 1 – SSN workshop 16 and HLSG 6 follow-up actions

The Netherlands mentioned that the IFCD presentation at HLSG 6 was made at the end of the meeting and many participants were not present. COM informed that the agenda of the next HLSG meeting will include the IFCD presentation at the beginning of the meeting.

5. References to LRIT information in IFCD

EMSA presented the background as follows:

- At SSN workshop 16, some MS questioned the limitation of LRIT references in the IFCD to LRIT flag access and the distribution through SSN GI (as included in IFCD v0.09). EMSA suggested reviewing the draft together with the EMSA Unit in charge of the LRIT and present a new proposal.
- In the draft presented at HLSG 6 meeting (IFCD v0.10), the references to LRIT information included a note stating that this issue was still under discussion and that the LRIT NCAs group will be consulted about the references to LRIT in the IFCD.
- EMSA prepared a revised draft of the IFCD with regards to LRIT references and consulted the LRIT expert group (Lisbon 19th January 2012) on the relevant elements of the text.
- The proposed revised draft and comments by the LRIT expert group were included in IFCD v0.13 submitted to the IFCD WG 4 for review.

EMSA clarified the legal framework supporting the distribution of LRIT information in the IFCD as a mandatory functionality of the system inclusion (Annex II, par. 3 of Directive 2002/59/EC as amended and Council Resolutions of 2 October 2007 and of 9 December 2008). EMSA proposed to consider the distribution of LRIT information to MSs (flag, coastal, Port and SAR) as part of SSN regardless it is though the SSN GI or via direct interfaces to the LRIT CDC.

The UK stated that the legal framework for LRIT in relation to SSN is not questionable. However, the current status of implementation is not aligned and the UK does not support to refer in the IFCD V.13 that the direct interfaces with LRIT DC are part of SSN. Several other members supported this position.

France added though SSN can be used to distribute LRIT data this should not change the way SSN is managed (e.g. performance standards from IMO for LRIT could not be referred to in the IFCD for SSN). France also questioned if the Council Resolutions could be considered as legal basis for SSN.

Ireland underlined the need to ask for guidance from the HLSG for addressing the LRIT distribution through SSN in the IFCD.

Poland noted that reducing the number of interfaces between MSs and EMSA is a good technical objective but considering LRIT as part of SSN could lead to the extension of the IMO LRIT audits to the SSN system.

COM concluded that LRIT is an integral part of SSN (as stated in Directive 2002/59/EC as amended). The Council Resolutions cannot change the legal basis but provides political guidance and an invitation to MSs to work towards the integration.

EMSA concluded that there is a mismatch between the legal requirements (as stated in Directive "SSN shall be used to distribute amongst Member States the LRIT information") and the current SSN technical implementation, but that the mandate to distribute the LRIT information to MS through SSN is clear.

EMSA proposed therefore to reflect this distribution of LRIT information through SSN in:

- Chapter 1 - Legal Framework (however, the reference to Council decisions is removed to the legal framework)

- Chapter 2.2 - Objectives

- Chapter 2.3 - Mandatory System Functionalities,

but not to mention LRIT (nor the LRIT NCAs or access rights) in the rest of the chapters, indicating with a footnote that the technical implementation for the distribution of LRIT data is under development and this will be detailed in the future IFCD revisions.

This **proposal was agreed by the IFCD WG** and shall be submitted to the SSN group and HLSG, explaining the drafting proposed within the meeting document.

6. Chapter 7 – System security review (IFCD draft v0.13)

The revised the Chapter 7 "System security" of the IFCD draft (v0.13) taking into account the guidelines of the HLSG 6.

Italy stated that a common security baseline is necessary for all MS and should gradually be implemented. **The UK** and **the Netherlands** stated that the security policy should only be applicable at central SSN system.

The UK informed that as NCA they cannot impose security measures on local systems. **COM** explained that the NCAs have an overall responsibility to guarantee that the local systems comply with the security requirements. The **UK** expressed the view that this is only true to the extent that a local system forms part of the National SSN and there is a lack of clarity about how this is to be interpreted with respect for example to a multifunctional Port Management System which includes the provision of SSN information as one part of its operational capacity.

Clarification was given of the revised wording for the audit requirement and **COM** advised that it had no mandate to carry out security audits of Member State systems.

The revision of chapter 7 was complete and approved as presented in **Annex 3** of this report.

7. Revision of other issues included in v0.10

The IFCD WG reviewed other issues included in v0.10 as follows:

a. **AIS Regional Server** – no further progress made. Germany reserves its position;

b. **SSN Graphical Interface** - no further progress made. Ireland reserves its position;

c. **Incident Reports access rights** – the UK recalled that the current technical implementation allows the ports to see all incident reports in SSN (in particular when using the SSN GI). It proposed to review the access rights in order to implement an "area restriction" to this information to port authorities. The UK agreed to consider this as a separate issue from IFCD (not affecting the IFCD drafting) and to resubmit it to SSN WG;

d. **Request/Response timeframes for data availability** – EMSA presented the results of the latest tests on SSN responses. The average value is 3.17 seconds. SSN response values higher than 4 minutes represent only 0.35% of the cases. The IFCD

WG agreed to review the drafting of the performance requirement to "average of 30 seconds (with a maximum delay of 4 minutes)".

The **NL** questioned why to reopen the discussion on the drafting of chapters 1, 2, 4, 5 and 6 that were already agreed at the SSN WS 16. EMSA replied that some members of the IFCD WG provided additional comments/questions on these chapters at this later stage of the drafting process. EMSA accepted to review the additional comments received on the issues, concerning mainly editorial changes.

The following additional comments received by the IFCD WG:

- Reference to Directive 2010/65/EU on the SSN legal framework: the IFCD WG agreed to include this reference in [] like for the Waste and Security information, and to add a footnote "to be implemented by 1st June 2015";

- Renaming the "Incident" information to "Alert": this proposal from France was not accepted as this was previously discussed and agreed by the SSN group (SSN workshop 10);

- Locations management: the IFCD WG agreed to move this to section 2.3 Mandatory System Functionalities;

- Clarify the possibility for the NCA to establish a centralised system: the IFCD WG agreed to clarify this possibility in section 2.5.1 as proposed by Norway;

- Email as part of the additional system functionalities in section 2.4: following a remark from France, it is proposed to include a reference to the email. This is currently used in the Incident Report distribution to issue a warning message to the MS along the planned route of the ship, informing that information is available in SSN regarding the incident. Ireland reserves its position with regards to the inclusion of email in this manner in the IFCD;

- Archive for at least 5 years: the UK indicated difficulties to comply with this requirement. EMSA confirmed that this corresponds to the timeframes agreed by the HLSG. The UK agreed to address this issue at the HLSG separately from the IFCD discussion.

Some editorial changes were also made which are reflected in the version 0.13. The IFCD WG should analyse these comments by correspondence.

Workshop Conclusions / Follow-up Actions

The workshop conclusions and follow up actions are noted in the relevant paragraphs of the minutes.

The calendar initially proposed at the meeting has been shifted of four days by EMSA:

Date	Action	Resp.
16 March	Draft a revised version to reflect the outcome of the meeting (IFCD v0.14)	**EMSA**
11 April	Provide comments on IFCD v0.14	**IFCD WG**
20 April	Compile draft v0.14 for SSN 17 (May 2012)	**EMSA**

The group will continue to work by correspondence to conclude the IFCD draft.

The table below indicates the detailed tasks and the associated leaders/participants responsible to carry out each task as well as the deadlines:

Action point	Item	Task leader	Associated	Deadline
LRIT information in IFCD				
1	Reflect the issue of distribution of the LRIT information through SSN in: • Chapter 1: Legal Framework • Chapter 2.2: Objectives • Chapter 2.3: Mandatory System Functionalities, but not to mention LRIT (nor the LRIT NCAs or access rights) in the rest of the chapters, indicating with a footnote that the technical implementation for the distribution of LRIT data is under development and this will be detailed in the future IFCD revisions.	EMSA	-	done
Chapter 7 – System security review				
2	Review the definition of SSN user (section 1.4) to reflect the possibility of having several persons performing the same function (e.g. MRCC duty officer) as a single SSN user;	EMSA	IFCD WG	2 April
3	Include additional clarifications under requirement (j) revision of credentials: specify what kind of "change";	EMSA	IFCD WG	2 April
4	Include additional clarifications under requirement (m) revision of authorisation/access rights: specify what kind of "change";	EMSA	IFCD WG	2 April
5	Review the wording and definition of Security Sensitive information (section 1.4);	EMSA	IFCD WG	2 April
6	Review the definition of Classified information (section 1.4);	EMSA	IFCD WG	2 April
7	Delete section 7.3 – Personal Data Protection and include as a requirement under section 7.2.2.5 – Confidentiality.	EMSA	IFCD WG	2 April
Revision of open issues included in v0.10				
10	Incident Reports access rights by Ports – to be considered as a separate issue from IFCD to be submitted to SSN WG. It should no longer be considered as an open issue of the IFCD;	UK	-	-

Action point	Item	Task leader	Associated	Deadline
11	Request/Response timeframes for data availability – review the drafting to "average of 30 seconds (with a maximum delay of 4 minutes)" to remove this open issue from the IFCD.	EMSA	-	done
Additional comments				
12	Reference to Directive 2010/65/EU on the SSN legal framework – include this reference in [] like for the Waste and Security information, and include a footnote "to be implemented by 1st June 2015"	EMSA	-	done
13	Locations management – move this to section 2.3 Mandatory System Functionalities;	EMSA	-	done
14	Possibility for the NCA to establish a centralised system – include this possibility in section 2.5.1;	EMSA	-	done
15	Email as part of the additional functionalities in section 2.4 – to be discussed at SSN WG.	EMSA	-	done

IFCD 3rd meeting: Detailed follow-up actions

Annexes

Annex 1 – List of participants

Annex 2 – 4th Meeting Agenda

Annex 3 – IFCD draft (v0.14) with outcome of the 4th meeting review

Annex 1 – Attendance List

SafeSeaNet Working Group "IFCD drafting", 4th Meeting, 1st March 2012

Country	Name	First Name	Organisation	E-mail	Attendance on 01.03.12
Bulgaria	Ivanov	Peter	Bulgarian Maritime Administration	peter_iv@marad.bg	
France	Duchesne	Philippe	Direction des Affaires Maritimes	philippe.duchesne1@developpement-durable.gouv.fr	
Ireland	Houlihan	Greg	Marine Survey Office	greghoulihan@dttas.ie	
Italy	Canu	Giovanni	Italian Coast Guard	giovanni.canu@mit.gov.it	
Italy	Puntin	Daniele	Italian Coast Guard	daniele.puntin@mit.gov.it	
Latvia	Bickovs	Deniss	Coast Guard Service	deniss.bickovs@mrcc.lv	
Latvia	Karhanins	Sergejs	Coast Guard Service	sergejs.karhanins@mrcc.lv	
Lithuania	Valdemaras	Ezerskis	Lithuanian Maritime Safety Administration	valdemaras@msa.lt	
Malta	Budgeja	David	Transport Malta	david.bugeja@transport.gov.mt	
Norway	Hauge	Jarle	Norwegian Coastal Administration	jarle.hauge@kystverket.no	
Poland	Kurpinski	Konrad	Maritime Office in Gdynia	konrad.kurpinski@umgdy.gov.pl	
Portugal	Santos	Ricardo	IPTM, IP	ricardo.santos@imarpor.pt	
Portugal	Marques	Nelson	IPTM, IP	nelson.marques@imarpor.pt	
Sweden	Sundklev	Monica	Swedish Transport Agency	monica.sundklev@transportstyrelsen.se	
Sweden	Kannerstål	Mats	Swedish Maritime Administration	mats.kannerstal@sjofartsverket.se	
The Netherlands	Kortekaas	Joram	Rijkswaterstaat vessel traffic management centre	joram.kortekaas@rws.nl	
United Kingdom	Stone	Gwilym	Maritime and Coastguard Agency	gwilym.stone@mcga.gov.uk	
	Avino	Michele	DG MOVE	Michele.AVINO@ec.europa.eu	
ITALY	LUIGI	DI FAZIO	ITALIAN COAST GUARD	luigi.di.fazio@mit.gov.it	
ITALY	MARCO	GIONFRIDDO	" " "	marco.gionfriddo@mit.gov.it	

EMSA staff

S/N	Name	First Name	E-mail
1	LIMA GALVAO	Marta	Marta.LIMA-GALVAO@emsa.europa.eu
2	RAMON JARRAUD	Helena	Helena.RAMON-JARRAUD@emsa.europa.eu
3	LE MOAN	Yann	Yann.LE-MOAN@emsa.europa.eu
4	AMIGO LOPEZ	Lorena	Lorena.AMIGO-LOPEZ@emsa.europa.eu

Annex 2

**DRAFT AGENDA
SSN IFCD DRAFTING WORKING GROUP
4th Meeting
Lisbon, 1 March 2012 (09:00 – 17:30)**

Time	Topic	Speaker	Ref. Document
09:00 – 09:30	**Registration and coffee**		
09:30 – 09:45	Welcome, meeting objectives and approval of the agenda	EMSA/COM	--
09:45 – 10:15	Review of the comments received at SSN workshop 16 and HLSG 6, follow-up actions	EMSA	IFCD 3 – Report (v1.0) SSN Workshop 16 – Report (v1.0) HLSG 6 draft report
10:15 – 11:00	Information on the input of LRIT NCAs	EMSA / Participants	IFCD draft (v0.13)
11:00 – 11:15	**Coffee break**		
11:15– 12:30	Discussion of IFCD Draft Chapter 7 – System Security	EMSA / Participants	IFCD draft – chapter 7 (v0.13)
12:30-14:00	**Lunch break**		
14:00 – 15:30	Discussion of IFCD Draft Chapter 7 – System Security	EMSA / Participants	IFCD draft – chapter 7 (v0.13)
15:30 – 15:45	**Coffee break**		
15:45 – 16:30	Discussion of IFCD Draft Chapter 7 – System Security	EMSA / Participants	IFCD draft – chapter 7 (v0.13)
16:30 – 17:00	Distribution of the follow actions	EMSA / Participants	--
17:00 – 17:30	**Conclusions and summary** **End of meeting**	EMSA / Participants	--

Annex 3

IFCD draft (v0.14)

with outcome of the 4th meeting review