

MARITIME SAFETY COMMITTEE  
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Agenda item 9

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## NAVIGATION, COMMUNICATIONS AND SEARCH AND RESCUE

### Sustainability and viability of the LRIT system

#### Submitted by Liberia

#### SUMMARY

<i>Executive summary:</i>	This document comments on the report of NCSR 1 and proposes changes relating to the functioning and the operation of the LRIT system to improve its financial sustainability and viability
<i>Strategic direction:</i>	5.2
<i>High-level action:</i>	5.2.4
<i>Planned output:</i>	5.2.4.2
<i>Action to be taken:</i>	Paragraph 19
<i>Related documents:</i>	MSC 83/6/14; NCSR 1/28 (paragraph 8.28); resolution MSC.263(84); resolution MSC.275(85); MSC.1/Circ.1376/Rev.1 and MSC.1/Circ.1412

#### Introduction

1 This document is submitted in accordance with the provisions of paragraph 6.12.5 of the *Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies* (MSC-MEPC.1/Circ.4/Rev.2) and comments on document NCSR 1/28.

2 NCSR 1, recognizing the need for a review of the LRIT system, agreed that the consideration of possible solutions relating to the functioning and the operation of the LRIT system to improve its financial sustainability and viability was a policy issue that was within the remit of the Maritime Safety Committee. Accordingly, the Sub-Committee invited interested Member Governments, if they considered it necessary, to submit appropriate proposals to the Committee (NCSR 1/28, paragraph 8.28). Liberia proposes changes to the minimum frequency of transmission of LRIT information and audits of the LRIT Data Centres.

## Background

3 The *Revised performance standards and functional requirements for the Long-Range Identification and Tracking (LRIT) of ships* (resolution MSC.263(84)) requires that LRIT shipborne equipment transmits LRIT information at a minimum of 6-hour intervals, unless the LRIT Data User requesting the provision of LRIT information specifies a more frequent transmission interval. The interval of transmission can be increased to 15 min, 30 min, 1 h, 3 h or 6 h, when requested by an LRIT Data User. It can also be reduced, under certain circumstances such as when a ship is undergoing repairs, to one transmission every 12 h or 24 h.

4 SOLAS regulation V/19-1.14 established that the Maritime Safety Committee shall determine the criteria, procedures and arrangements for the establishment, review and audit of the provision of long-range identification and tracking information for Contracting Governments pursuant to the provisions of this regulation. In this regard, the Committee adopted resolution MSC.275(85), appointing the International Mobile Satellite Organization (IMSO) to perform the functions and duties specified in the Revised performance standards, which includes the annual performance audit and review of LRIT Data Centres and of the International LRIT Data Exchange.

5 MSC.1/Circ.1376/Rev.1 defines an LRIT Operational governance body for the LRIT system. This Operational body is currently defined by representatives of the Secretariat, the IDE and the disaster recovery site of the IDE. The body is currently authorized to take immediate decisions to protect and safeguard the system in case of an emergency situation or a malicious attack. NCSR 1 agreed on amendments to MSC.1/Circ.1376/Rev.1, which the Committee is expected to approve at this session, authorizing the governance body to also make relevant technical recommendations with the view to improving the efficiency, effectiveness and security of the LRIT system. The composition of the governance body can be reviewed at any time.

## Discussion

6 The LRIT system has been fully operational for five years and has proven to be stable in regards to its performance and operation. This has been verified through multiple audits of the LRIT Data Centres and the International LRIT Data Exchange, without any significant findings. We wish to acknowledge the excellent work performed by IMSO over the past several years in taking on and performing the LRIT coordinator function on behalf of IMO and the Contracting Governments that have operated the IDE on a voluntary basis.

7 When the LRIT system was under consideration, the Committee expressed the view that the system should be available to all Contracting Governments on a non-discriminatory, fair and economically sustainable basis and that the system should be established on a sound financial basis so as to ensure its long-term viability and sustainability. This included use of LRIT data by Contracting Governments in their role as coastal and port States. The demand for LRIT appears to have remained fairly consistent with that estimated in MSC 84/6/3, which was based on responses to the IMO Questionnaire on LRIT-related matters, MSC 83/6/14. Several initiatives and proposals have been introduced over the past years to encourage the use of the LRIT system; however there has been no measurable increase in users. As an example, during the period from 1 January to 30 June 2014, Liberian flagged vessels transmitted 2,204,031 position reports of which only 17% were requested by Contracting Governments. The low level of requests for LRIT data and the excessively large number of required LRIT transmissions continues to place a financial burden on Contracting Governments.

8 The high cost for the review and audit of Data Centres has been raised by numerous Contracting Governments as a concern affecting the financial sustainability of the LRIT system. For Contracting Governments with smaller fleets, the audit fees are particularly burdensome as they constitute a considerable portion of their LRIT operation costs. It is noted that audits are performed using specially developed software to assess compliance with LRIT standards, as opposed to physical audits of the Data Centres. The equity of the charging formulae to apportion audit fees among LRIT Data Centres continues to be debated as to its fair distribution of the costs versus services performed. While several actions have been taken to reduce audit fees, the fees remain excessive and a disincentive for establishing new Data Centres. This is due to the way IMSO establishes its charges for auditing LRIT Data Centres, which is basically based on IMSO's budget and not in the work conducted. The audit of LRIT Data Centres has become throughout the years quite complicated, looking at very small details which are not really relevant to the main objective of the audit, which is to ensure the timely provision of LRIT information.

### **Proposals**

9 In order to reduce the cost burdens on Contracting Governments and improve the long-term financial sustainability and viability of the LRIT system, Liberia proposes the following:

- .1 change the default interval for transmission of LRIT information to two transmissions every 24 h; and
- .2 establish a different mechanism for the audit of LRIT Data Centres.

### **Changing the default interval for transmission of LRIT information to two transmissions every 24 h**

10 The current configuration of the LRIT shipborne equipment already allows changing the interval of transmission to 12 h. Therefore, retesting of LRIT shipborne equipment would not be needed.

11 No amendments to the SOLAS Convention are foreseen for changing the default interval of 6 h. However, the Revised performance standards and some MSC circulars may require some amendments.

### **Establishment of a different mechanism for the audit of LRIT Data Centres**

12 As indicated in paragraph 8 above, audits are basically conducted using a software that processes samples of information provided by LRIT Data Centres and produces a report which is later examined by the LRIT Coordinator. Operators of LRIT Data Centres are then invited to provide comments based on findings.

13 The main aim of the audit is to ensure that Administrations provide the LRIT information they are obliged to provide and that Contracting Governments and SAR services requesting LRIT information receive the information they are entitled to receive.

14 The IMO Global Integrated Shipping Information System (GISIS) allocates several modules to fulfil reporting requirements, including one of the main components of the LRIT system, which is the LRIT Data Distribution Plan (DDP). Liberia believes that a new module could be created in GISIS to perform the analysis of samples of data submitted by LRIT Data Centres and produce a report. Such a report could be later evaluated by the LRIT Operational governance body.

15 The new module should be simple and should focus on the main aim of the audit, as indicated in paragraph 13 above. This mechanism would also allow the review of the frequency of the audits, if necessary. The great benefit would be that LRIT Data Centres would not incur any audit charges.

16 The audit mechanisms would not require any amendments to the SOLAS Convention. However, certain amendments to the Revised performance standards and related MSC circulars would be required.

17 Liberia is of the view that the above proposals would significantly alleviate the financial burden put on Contracting Governments in respect to compliance with the provisions of SOLAS regulation V/19-1.

18 Should the Committee agree with the above proposals, NSCR 2 could be instructed to develop the necessary draft amendments to the Revised performance standards and related MSC circulars and action plan for implementation.

#### **Action requested of the Committee**

19 The Committee is invited to consider the following proposals to improve the financial sustainability and viability of the LRIT system:

- .1 change the default interval for transmission of LRIT information to two transmissions every 24 h;
- .2 establish a different mechanism for the audit of LRIT Data Centres; and
- .3 if agreed, instruct the NCSR Sub-Committee to develop the necessary draft amendments to the Revised performance standards and related MSC circulars and action plan for implementation.