

*Department for*  
**Transport**

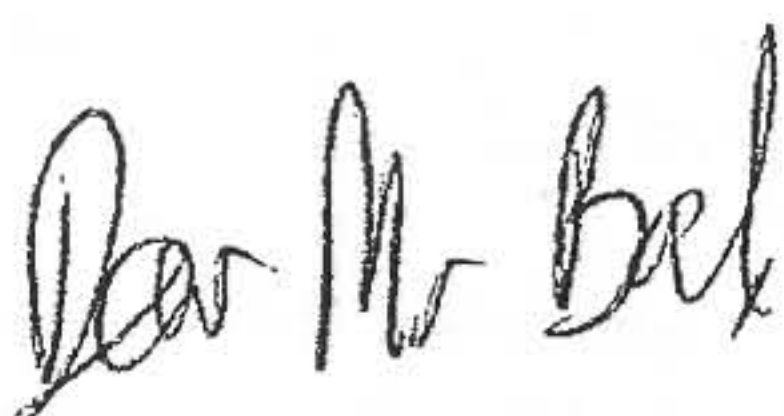
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I am writing concerning the new Interface and Functionalities Control Document (IFCD) will play a vital role in the further development of SafeSeaNet.

As you will recall, the third meeting of the High-Level Steering Group on SafeSeaNet discussed the IFCD at length. The Commission explained that the IFCD would be established on the basis of Annex III of Directive 2002/59/EC, and underlined the necessity of striving for agreement on technical parts of the IFCD in the EMSA's SafeSeaNet working group. The HLSG agreed that the draft IFCD will be based on the underlying principles and concrete content of relevant existing SafeSeaNet documents used by Member States and EMSA for developing their systems, and that the outcome of discussion held in the HLSG on "access rights" for any additional categories of users would also be reflected. The HLSG set a timetable, according to which the first draft would be ready for discussion at HLSG 5 in March 2011 and the final draft would be ready for approval at HLSG 7 in March 2012.

The UK is keen to participate fully in the process of drafting the IFCD. We feel that the group responsible for drafting the IFCD should be set up with terms of reference which clearly establish its relationship to the HLSG and to other SafeSeaNet groups. We consider that the group should develop the outline timetable for drafting the IFCD into a detailed work plan for adoption by the HLSG.

We would also like to take this opportunity to highlight some principles that we believe should be followed in the drafting process, and some items that we believe should be included within the IFCD in order to make it an effective document that supports EMSA's and the Member States' ability to achieve the common objective of SafeSeaNet.

The principles which we suggest should be adhered to are as follows:

- During the period of drafting the IFCD it must be made clear that the current ICD is still the authoritative document and Member States are not under obligation to



implement any changes to standards and processes until after the IFCD has been formally and finally approved, and then within the context of an appropriate implementation period.

- The IFCD should only contain standards based on the legal obligations coming from the Directive(s). We support initiatives to share "best practice" between Member States, but feel that these need to be taken forward separately from the definition of legally binding standards within the IFCD.
- The IFCD should frame standards in terms of outcomes and, as far as possible, leave Member States to implement these within whatever organisational and technical solutions are best suited to the situation within the Member State.
- Any changes to the standards and processes within the IFCD should be supported by clearly identified benefits, and an assessment of the whole life costs to EMSA, Member States, and to Local Competent Authorities. This evaluation should be made using an agreed process such as the IMO Formal Safety Assessment.
- Any changes that result in changes to 'policy' should be excluded from the discussion of the IFCD drafting group and referred to an appropriate forum. An example of this is that the SSN core is defined as an Index Server and yet the suggestion that this changes and the core acts as a repository for all data has been introduced within technical documents of a working group without bringing it first to the attention of the correct forum.

The items which we propose for inclusion are as follows:

- **Data Quality Tolerance Levels:** The NCA SPOC currently seems to be expected to respond in detail to all Maritime Support Services (MSS) feedback, even when they report issues that affect only 1 or 2 messages out of several hundred thousand. The costs and benefits of committing resource to the analysis and correction of such low incidence issues need to be considered. The IFCD should, therefore, include sensible tolerance levels for data quality issues (e.g. only investigating an issue if it results in more than 1% of messages being rejected) as this would help Member States target their limited resources more effectively to deal with the most important data quality issues. While all Member States should be working to improve data quality we would also suggest that the validations within SSN-EIS should only reject notifications when they contain errors that render them useless for Search and Rescue or Counter Pollution actions. We are concerned that some of the current validations exclude messages from SSN on the basis of minor errors while the message content as a whole would have given viable information.
- **Service Level Agreements for MSS Feedback:** MSS are sending the NCA SPOC an increasing amount of data quality correspondence which appears to be generated on an ad-hoc basis that changes from month to month. There should be mutually agreed triggers from data quality feedback – so that Member States know the issues that they need to address and are able to allocate appropriate resource to address these issues. The lines of communication for this type of feedback should be clearly separated from those relating to ongoing operational incidents.



- **Clarification of the System Availability Standards:** There needs to be a clearer definition of system availability that takes messages flows as the core parameter. We would like to see a distinction drawn between planned interventions and system failures within the standard. We also note that the current 99% standard has been breached by the SSN-EIS and most, if not all, of the Member State systems. From our own experience attempts to procure technical solutions and support arrangements that would align to this requirement were financially prohibitive and therefore a more realistic and achievable standard should be applied. A clear definition of what is expected of the Member State following a period of unavailability is also required.
- **Change Control:** The IFCD should provide an effective mechanism of change control for the SSN-EIS in which Member States are able to provide feedback about the impact on their systems before the implementation timeframes are agreed. Therefore the classification of changes as Major or Minor will be done jointly by EMSA and the Member States, and wherever possible changes should be grouped and scheduled so as to form coherent work packages (ideally resulting in changes being released not more than once a year). There should also be a clearly defined process for incorporating future updates into the document to ensure that the system and the document remain aligned so that the current divergence between the operating procedures and requirements and the ICD is not repeated, for example the process could be that a chapter a year is reviewed and updated if necessary.
- **Notifications via the SSN Web Interface:.** The IFCD should acknowledge the current situation of the extensive use of this temporary functionality and, under the guidance of the HLSG, define a clear timetable for the phase out of this functionality to allow Member States the opportunity to make informed investment plans around the development of their national systems. The suggestion has been made by EMSA that the Web Interface would be retained as a backup in the event of a national system being unavailable. If this suggestion is agreed by the HLSG, then the IFCD should provide for the circumstances under which a Member State could use this option. It should also acknowledge that for some Member States the volume of messages render this kind of manual notification an operational impossibility.
- **Protocol for the resolution of “inconsistencies”:** Within the current implementation of SSN there have been a number of so called “inconsistencies” between the published specification and the operational system. We acknowledge that these are an inevitable part of the development of systems on the scale and complexity of SSN. It can therefore be anticipated that there will be these kinds of “inconsistencies” in the future and so the IFCD should set out a clear protocol for the identification, notification, and resolution of these issues in the future.

We are content for this letter to be circulated to other Member States, and we suggest that it would be helpful for it to be provided to the drafting group when it is initiated, to assist in the formulation of its work plan. We look forward to receiving details of the arrangements for the formation of the drafting group and reiterate our readiness to take an active part in the work of the group.



If you consider that any of the points raised in this letter needs clarification or amplification, Godfrey Souter in Shipping Policy Division (tel: +44 (0) 20 7944 5126, e-mail [Godfrey.Souter@dft.gsi.gov.uk](mailto:Godfrey.Souter@dft.gsi.gov.uk)) will be pleased to assist you.

This letter is copied to Jean-Louis Colson at the European Commission and Rachel Ward at the UK's Permanent Representation to the EU.

Best regards  
