

**Submission of the United States to the International Maritime Organization's
Sub-Committee on the Safety of Navigation
for its 56th Session under Agenda item 4
June 4, 2010**

**GUIDELINES FOR CONSIDERATION OF REQUESTS FOR SAFETY ZONES LARGER
THAN 500 METRES AROUND ARTIFICIAL ISLANDS, INSTALLATIONS AND
STRUCTURES IN THE EEZ**

SUMMARY

Executive summary: This document comments on the Report of the Correspondence Group. The United States believes there is no demonstrated need at present to expand safety zones beyond 500 meters or to develop guidelines to do so. Due to the present absence of a demonstrated need, focusing more closely on the means of developing mariner awareness, available routing measures and charting options, as well as re-emphasizing existing Organization guidance on safety zones, are more prudent and appropriate ways for ensuring the safety both of ships and of artificial islands, installations and structures in the exclusive economic zone

Strategic direction: 1.1, 1.3, 5.2

High-level action: 1.1.2, 1.3.1, 5.2.4

Planned output: 1.3.1.2, 5.2.4.2

Action to be taken: Paragraph 8

Related documents: NAV 56/4; NAV 53/3, NAV 53/INF.2; NAV 55/21; MSC 84/22/4; resolutions A.572(14) and A.671(16), as amended; GPSR (9th edition); MSC/Circ.1060, as amended and SN/Circ.199

Introduction

1. This document comments on document NAV 56/4 and is submitted in accordance with the Guidelines on the organization and method of work of the Maritime Safety Committee and the Marine Environment Protection Committee and their subsidiary bodies and paragraph 4.10.5 thereof (MSC-MEPC.1/Circ.2).
2. The United States believes there is no demonstrated need at present for safety zones larger than 500 meters or the development of guidelines for such safety zones. Accordingly, we did not join in the recommendation of the Correspondence Group in its report to the Sub-Committee. We believe the focus should be more closely on the means of ensuring mariner awareness of the location of artificial islands, installations or structures, on available routing measures and charting options, as well as a re-emphasis on existing Organization guidance on safety zones as a more prudent and appropriate way for ensuring the safety both of ships and of artificial islands, installations and structures in the exclusive economic zone (EEZ).

Observations during the Correspondence Group

3. The United States participated in the work at NAV 53 (which considered Brazil's request for a safety zone larger than 500 meters around a floating production, storage and offloading unit (FPSO)), and MSC 84, as well as NAV 55 and in the Correspondence Group effort. During the Correspondence Group work, despite the representations in the work item request to MSC 84, of which we were one of the co-sponsors, many Correspondence Group members expressed the view that expanded safety zones in the EEZ do not appear to be needed, at least for single and traditional artificial islands, installations or structures. Also, one member noted that after studying the matter, expanded safety zones might not improve, and in fact might degrade, navigation safety around multiple installations and structures, particularly if they are located in close proximity to recognized sea lanes essential to international navigation.

4. On further analysis, the goals regarding the safety of complex FPSOs and wind farms (that is, the so-called multiple structures) seem to be to ensure that mariners understand the locations of those FPSOs as artificial islands, installations or structures, both on nautical charts and on the water surface, in order to navigate safely around them. In this regard, the Sub-Committee's effort is essentially one to more clearly identify these objects through a standardized chart symbol that depicts a swing circle for an FPSO; the chart symbol would also have the expression that a moving safety zone exists around the FPSO as it pivots on its spud mooring and measured from the FPSO's outer edges a distance of 500 meters. For other complex or multiple structure fields, like wind farms, it was reported by another Correspondence Group participant that had extensively studied the matter that safety zones larger than 500 meters may not be in the best interests of navigation safety. The observations during the Correspondence Group work highlighted that appropriate routing measures, separately or in combination, already exist to address the exceptional circumstances that arise in regard of these structures.

5. Also, some participants observed that safety zones are not actually routing measures and, thus, might not be a proper topic to include in the General Provisions on Ships' Routing (GPSR). We also appreciate the concerns raised by Norway as reflected in NAV 56/4, which highlight additional difficulties in this undertaking. All of these observations have led to the United States' view that there is no uniform support to developing guidelines.

6. The Sub-Committee, undoubtedly, recognizes the significance of this undertaking with respect to safety and navigational rights and freedoms. That said, the United States is concerned that the relatively small number of interested participants in a matter with such potentially significant effects on safety and navigation may lead to a recommendation that would have an incomplete basis, inadequately understood ramifications, and potentially adverse implications for safety and navigation. Recognizing the specific Work Programme item from the Committee, the Sub-Committee should, nonetheless, provide a recommendation to the Committee that is grounded in a complete, accurate and commonly-shared understanding of the need for expanded safety zones in the EEZ, as well as a full appreciation of the ramifications of developing guidelines for such safety zones.

Alternative approach

7. As such, we may be better served by an alternative approach. Rather than developing guidelines in a new Annex to the GPSR, the United States proposes an appropriate SN circular pertaining to safety zones and the safety of navigation around offshore installations and structures. We are grateful to the Coordinator of the Correspondence Group in this regard for including our proposed SN circular as annex 2 to the Correspondence Group report. This draft SN circular attempts to capture the important points and observations that the Group made in its work and is intended to be a way to provide guidance without becoming enmeshed in a thicket of difficult questions that may arise from the proposal to develop guidelines for expanded safety zones.

Action requested of the Sub-Committee

8. The Sub-Committee is invited to consider recommending annex 2 of NAV 56/4 for adoption and circulation in lieu of continued work on developing guidelines to expand safety zones.