

**SEAFARERS' ADVISORY BOARD**

**Use of Electronic Official Log Book for Hong Kong Registered Ships**

**Purpose**

The purpose of this paper is to seek members' views on the proposal of amending the Merchant Shipping (Seafarers) Ordinance (Cap. 478) to introduce the use of electronic Official Log Book ("e-official logbook") for Hong Kong registered ships ("HK ships") as an alternative option of paper log book and the provision of an acceptable electronic record keeping system on board for the e-official logbook.

**Background**

2. Electronic log books ("e-logbooks") such as the deck/engine log books, including electronic record books such as oil record book, are becoming more prevalent than traditional paper log books. Despite the difference in format, traditional paper log books and e-logbooks serve the same purposes and are subject to the same common requirements. The e-logbooks will bring significant benefits to their users, e.g. ship's staff, shore company managers, the flag State and Port State Control inspectors, in terms of time saving, data validation and data sharing. The acceptance of e-logbooks by the Hong Kong Marine Department (HKMD) will not only reduce the workload of shipboard staff in reproducing the data on paper, but also ensure the accuracy of entries as the data can be fed automatically from ship's equipment to the e-logbooks directly.

3. In view of the potential benefits mentioned in paragraph 2 above, flag States have been allowed to approve e-logbooks as a means of record since the IMO's adoption of the Guidelines for the Recording of Events Related

to Navigation<sup>1</sup> in 2002. In fact, some major flag States have already initiated the usage of e-logbooks on their fleet. While the IMO has yet to develop specific guidelines for the use of e-logbooks, IMO and other relevant international organization have adopted similar guidelines for the use of electronic records to which reference could be made when regulating the use of e-logbooks. Such guidelines include the Guidelines for the Use of Electronic Record Books under the International Convention for the Prevention of Pollution from Ships (“MARPOL”)<sup>2</sup> adopted by the IMO in 2019, as well as similar guidelines for shipboard electronic record books issued by the International Organization for Standardization (“ISO”)<sup>3</sup>. Based on these guidelines, HK ships may develop a logging system for the use of e-logbooks on board by electronic devices.

### **Official Log Book**

4. Under the Merchant Shipping (Seafarers) Ordinance (Cap. 478), the Official Log Book in its prescribed form is required to be kept onboard for inspection by flag and port State inspectors or concerned parties and also to be submitted to HKMD as required. Furthermore, the Official Log Book may be required to be submitted to the court in any legal proceedings according to the Merchant Shipping (Safety) Ordinance, Cap.369<sup>4</sup>.

5. Under the existing regulatory regime, the Official Log Book can only be issued in paper form for HK ships. In order to introduce the legal use of e-official logbook for HK ships and their acceptance by HKMD, there is a need to conduct legislation amendment in accordance with our legal advice.

### **The Proposal**

6. Our policy intent is to keep the intact of our existing regulatory regime in relation to paper Official Log Book. However, we propose to conduct legislation amendment in order to introduce the use of e-official logbook as an alternative option of paper Official Log Book.

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<sup>1</sup> IMO A.916(22) of 2002

<sup>2</sup> IMO Resolution MEPC 312(74).

<sup>3</sup> ISO 21745 – “Electronic record books for ships-Technical specification and operational requirements”.

<sup>4</sup> Section 122 of Cap.369 - “Use of official log-book in evidence”

7. Meanwhile, for the implementation of e-official logbooks, shipowner is required to put in place an acceptable electronic record keeping system on board HK ships for keeping the required information for the prescribed e-official logbook. The system should be capable to export electronically for submitting required information of the e-official logbook to HKMD as required pursuant to the requirements of Merchant Shipping (Seafarers) (Official Log Books) Regulation, Cap.478P<sup>5</sup>.

8. It is anticipated that the proposal of legislative amendment and the provision of a shipboard electronic record keeping system would render better support for shipowners and ship operators of HK ships and to enhance our services in order to better meet the needs of the industry.

### **Consultation**

9. Members' comments on, if any, and endorsement of the proposal are hereby sought.

Marine Department  
Multi-lateral Policy Division  
September 2022

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<sup>5</sup> Section 11 of Cap.478P - "Delivery of official log book"