

**Hong Kong Fleet Operation Advisory Committee**

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

**Purpose**

The purpose of this paper is to seek members' views on the proposal of amending our existing shipping ordinances to introduce the use of electronic log books ("e-logbooks") for Hong Kong registered ships ("HK ships") as an alternative option of paper log books and the provision of an acceptable electronic record keeping system on board for the e-logbooks.

**Background**

2. 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 saving time, 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 the 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 recording 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

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

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.

4. There are various log books under HK ships, among them, only the Official Log Book is required to be submitted to the Marine Department for custody or inspection. Others are kept onboard for inspection by flag and port State inspectors or concerned parties. On the format of the log books, only the Official Log Book, record books<sup>4</sup> under MARPOL and BWMC<sup>5</sup> are prescribed but not the deck, engine room and radio log books. However, including the Official Log Book, all log books may be required to be submitted to the court in any legal proceedings according to the Merchant Shipping (Safety) Ordinance, Cap.369<sup>6</sup>.

5. Under the existing regulatory regime, log books can only be issued in paper form for HK ships. In order to introduce the legal use of e-logbooks 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 log books. As such, we propose to conduct legislation amendment to introduce the use of e-logbooks as an alternative option of paper log books.

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<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> Oil Record Book, NLS Cargo Record Book, Garbage Record Book, Ozone Depleting Substances Record Book, Record Book for control of NO<sub>x</sub> in Emission Control Area, Record Book for control of SO<sub>x</sub> in Emission Control Areas, Ballast Water Record Book.

<sup>5</sup> International Convention for the Control and Management of Ships’ Ballast Water and Sediments

<sup>6</sup> Section 122 of Cap.369 - “Use of official log-book in evidence”

7. The following Ordinances will be amended to introduce the use of e-logbooks.

- (a) Merchant Shipping (Safety) Ordinance (Cap. 369);
- (b) Merchant Shipping (Prevention and Control of Pollution) Ordinance (Cap. 413); and
- (c) Merchant Shipping (Seafarers) Ordinance (Cap. 478)

8. For the implementation of e-logbooks, shipowner is required to put in place an acceptable electronic record keeping system on board HK ships for keeping the information pertaining to different kinds of log books. For the prescribed Official Log Book, the system should be capable to export and submit the information of the electronic Official Log Book electronically to HKMD as required by the Merchant Shipping (Seafarers) (Official Log Books) Regulation, Cap.478P<sup>7</sup>.

9. 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**

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

Marine Department  
Multi-lateral Policy Division  
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<sup>7</sup> Section 11 of Cap.478P - "Delivery of official log book"