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**UNIFIED INTERPRETATION OF PROVISIONS OF IMO SAFETY, SECURITY, AND
ENVIRONMENT RELATED CONVENTIONS**

Annual testing of the VDR, S-VDR, AIS and EPIRB

Submitted by the International Association of Classification Societies (IACS)

SUMMARY

Executive summary: This document provides an interpretation of the provisions of SOLAS relating to the annual testing of the VDR, S-VDR, AIS and EPIRB, which has been developed by IACS to facilitate the uniform implementation of these requirements

Strategic direction: 1.1

High-level action: 1.1.2

Output: 1.1.2.3

Action to be taken: Paragraph 8

Related documents: SOLAS regulations IV/15.9, V/18.8 and V/18.9; MSC.1/Circ.955, MSC.1/Circ.1222 and MSC.1/Circ.1252

Introduction

1 SOLAS regulation V/18.8 states:

"The voyage data recorder system, including all sensors, shall be subjected to an annual performance test. The test shall be conducted by an approved testing or servicing facility to verify the accuracy, duration and recoverability of the recorded data. In addition, tests and inspections shall be conducted to determine the serviceability of all protective enclosures and devices fitted to aid location. A copy of the certificate of compliance issued by the testing facility, stating the date of compliance and the applicable performance standards, shall be retained on board the ship."

In addition, paragraph 3 of the annex to MSC.1/Circ.1222 states:

"The manufacturer must complete a review, record any changes and issue the completed test report within 45 days. To accommodate performance checks to align with the appropriate survey under the Harmonized System of Survey and Certification (HSSC), the annual performance check may be carried out up to 3 months before the due date for a passenger ship and +/- 3 months of the due date for a cargo ship. (The maximum period between subsequent checks is, therefore, 15 months for passenger ships and 18 months for cargo ships, unless either certificate has been extended as permitted by SOLAS regulation I/14, in which case a similar extension may be granted.)"

2 SOLAS regulation V/18.9 states:

"The automatic identification system (AIS) shall be subjected to an annual test. The test shall be conducted by an approved surveyor or an approved testing or servicing facility. The test shall verify the correct programming of the ship static information, correct data exchange with connected sensors as well as verifying the radio performance by radio frequency measurement and on-air test using, e.g., a Vessel Traffic Service (VTS). A copy of the test report shall be retained on board the ship."

In addition, paragraph 3 of the annex to MSC.1/Circ.1252 states:

"To accommodate performance test to align with the appropriate survey under the Harmonized System of Survey and Certification (HSSC), the annual testing may be carried out:

- .1 up to 3 months before the due date of the passenger ship renewal survey or the cargo ship safety equipment renewal survey; and
- .2 3 months before or after the due date of the cargo ship safety equipment periodical/annual survey (the maximum period between subsequent test is governed by the time window associated to the subsequent surveys, unless either certificate has been extended as permitted by SOLAS regulation I/14, in which case a similar extension may be granted by the Administration)."

3 SOLAS regulation IV/15.9 states:

"Satellite EPIRBs shall be:

- .1 annually tested for all aspects of operational efficiency, with special emphasis on checking the emission on operational frequencies, coding and registration, at intervals as specified below:
 - .1 on passenger ships, within 3 months before the expiry date of the Passenger Ship Safety Certificate; and
 - .2 on cargo ships, within 3 months before the expiry date, or 3 months before or after the anniversary date, of the Cargo Ship Safety Radio Certificate.

The test may be conducted on board the ship or at an approved testing station; and

- .2 subject to maintenance at intervals not exceeding five years, to be performed at an approved shore-based maintenance facility."

In addition the second subparagraph of paragraph 1 and paragraph 4 of MSC.1/Circ.955 state:

"The servicing intervals of the aforementioned life-saving appliances and satellite EPIRBs required by SOLAS regulations III/20.8, III/20.9 and IV/15.9, respectively, shall not exceed 12 months which may be extended to 17 months where in any case this is impracticable in exceptional circumstances. In the meantime, according to regulations I/8 and I/9 of the 1988 SOLAS Protocol, the said appliances shall be subjected to an annual or a periodical survey within 3 months before or after each anniversary of the Cargo Ship Safety Equipment Certificate and of the Cargo Ship Safety Radio Certificate, respectively, or the Cargo Ship Safety Certificate, i.e. maximum 18 months interval."

"The Committee, in pursuance of the HSSC's objectives to "simplify survey requirements, thereby reducing the burden on Administrations, operators of ships and the crews of ships", decided that:

"the servicing intervals of life-saving appliances and radiocommunication equipment for ships, whose flag States implement the HSSC, may be in concert with the terms of the HSSC annual, periodical and renewal survey stipulated in the 1988 SOLAS Protocol notwithstanding regulations III/20.8, III/20.9 and IV/15.9 of the 1974 SOLAS Convention, as amended".

Discussion

4 The issue of the execution of the annual VDR performance test as part of the Safety Equipment periodical survey was brought to the attention of IACS and, in particular, whether:

- the test needs to be carried out at the same time, or in advance of (by respecting the limit of minus three months from the survey anniversary date), the completion of the survey; or
- if the test may be carried out after the completion of the survey on the basis that, according to the provisions of the MSC.1/Circ.1222, the previous test may be considered valid till to the end of the time window allowed for the completion of the Safety Equipment periodical survey (taking account of the "additional" three months from the anniversary date).

5 Having extensively discussed the issue, IACS Members agreed that the intent of MSC.1/Circ.1222 is to align the performance test with the intervals of the surveys specified in the Harmonized System of Survey and Certification (HSSC). Therefore, the validity of the previous performance test can be maintained, even if it was last conducted more than one year ago, if the periodical survey is undertaken in accordance with the HSSC schedule, including the "additional" three-month window. Therefore IACS considers that the annual performance test is to be carried out within the "time window" of the annual/periodical/ renewal survey under the HSSC, but not later than the date of completion of the survey for endorsement/renewal of the relevant Certificate.

6 It was agreed to broaden the scope of this discussion beyond the VDR (or S-VDR) to include the annual test of the AIS and the EPIRB. In this regard it was noted that SOLAS regulation IV/15.9 regarding the annual testing of the EPIRB is independent of the HSSC System. Consequently, the interpretation relating to the testing of the EPIRB refers to the relevant survey in a generic manner, without any reference to the HSSC.

7 Based on the above understandings IACS has developed and finalized a Unified Interpretation (IACS UI SC279), a copy of which is provided in the annex to this document. The Sub-Committee is invited to note that IACS Members intend to implement UI SC279 from 1 July 2017, unless they are provided with written instructions to apply a different interpretation by the Administration on whose behalf they are authorized to act as a recognized organization.

Action requested of the Sub-Committee

8 The Sub-Committee is invited to:

1. consider the foregoing, the copy of the Unified Interpretation provided in the annex and the implementation provisions discussed in paragraph 7 above; and
2. take action as appropriate.

ANNEX

SC279 (June 2016)

Annual testing of VDR, S-VDR, AIS and EPIRB

- SOLAS regulation V/18.8 – Annual performance test of Voyage Data Recorder (VDR) and Simplified Voyage Data Recorder (S-VDR)
- SOLAS regulation V/18.9 – Annual performance test of Automatic Identification System (AIS)
- SOLAS regulation IV/15.9 – Annual test of EPIRB

The SOLAS 74 as amended at regulation V/18 paragraph 8 reads:

SOLAS regulation V/18.8

The voyage data recorder system, including all sensors, shall be subjected to an annual performance test. The test shall be conducted by an approved testing or servicing facility to verify the accuracy, duration and recoverability of the recorded data. In addition, tests and inspections shall be conducted to determine the serviceability of all protective enclosures and devices fitted to aid location. A copy of the certificate of compliance issued by the testing facility, stating the date of compliance and the applicable performance standards, shall be retained on board the ship.

Moreover, the annex to MSC.1/Circ.1222 at paragraph 3 expects:

3 The manufacturer must complete a review, record any changes and issue the completed test report within 45 days. To accommodate performance checks to align with the appropriate survey under the Harmonized System of Survey and Certification (HSSC), the annual performance check may be carried out up to 3 months before the due date for a passenger ship and +/- 3 months of the due date for a cargo ship. (The maximum period between subsequent checks is, therefore, 15 months for passenger ships and 18 months for cargo ships, unless either certificate has been extended as permitted by SOLAS regulation I/14, in which case a similar extension may be granted.)

Interpretation

The annual performance test of VDR (or S-VDR) shall be carried out within the "time window" of the annual / periodical / renewal survey under the Harmonized System of Survey and Certification (HSSC), but not later than the date of completion of the survey for endorsement / renewal of the relevant Certificate.

Note:

1. This UI is to be applied by IACS Members when acting as recognized organizations, authorized by flag State Administrations to act on their behalf, unless otherwise advised, from 1 July 2017.

The SOLAS 74 as amended at regulation V/18 paragraph 9 reads:

SOLAS regulation V/18.9

9. The automatic identification system (AIS) shall be subjected to an annual test. The test shall be conducted by an approved surveyor or an approved testing or servicing facility. The test shall verify the correct programming of the ship static information, correct data exchange with connected sensors as well as verifying the radio performance by radio frequency measurement and on-air test using, e.g. a Vessel Traffic Service (VTS). A copy of the test report shall be retained on board the ship.

Moreover, the annex to MSC.1 Circ./1252 at paragraph 3 expects:

3 To accommodate performance test to align with the appropriate survey under the Harmonized System of Survey and Certification (HSSC), the annual testing may be carried out:

- .1 up to 3 months before the due date of the passenger ship renewal survey or the cargo ship safety equipment renewal survey; and*
- .2 3 months before or after the due date of the cargo ship safety equipment periodical/annual survey (the maximum period between subsequent test is governed by the time window associated to the subsequent surveys, unless either certificate has been extended as permitted by SOLAS regulation I/14, in which case a similar extension may be granted by the Administration).*

Interpretation

The annual performance test of the Automatic Identification System (AIS) shall be carried out within the "time window" of the annual / periodical / renewal survey under the Harmonized System of Survey and Certification (HSSC), but not later than the date of completion of the survey for endorsement / renewal of the relevant Certificate.

The SOLAS 74 as amended at regulation IV/15 paragraph 9 reads:

SOLAS regulation IV/15.9

9 Satellite EPIRBs shall be:

- .1 annually tested for all aspects of operational efficiency, with special emphasis on checking the emission on operational frequencies, coding and registration, at intervals as specified below:*
 - .1 on passenger ships, within 3 months before the expiry date of the Passenger Ship Safety Certificate; and*
 - .2 on cargo ships, within 3 months before the expiry date, or 3 months before or after the anniversary date, of the Cargo Ship Safety Radio Certificate.*

The test may be conducted on board the ship or at an approved testing station; and

- .2 *subject to maintenance at intervals not exceeding five years, to be performed at an approved shore-based maintenance facility.*

Moreover, the MSC.1/Circ.955 at paragraph 2 and 4 reads:

.....omission.....

The servicing intervals of the aforementioned life-saving appliances and satellite EPIRBs required by SOLAS regulations III/20.8, III/20.9 and IV/15.9, respectively, shall not exceed 12 months which may be extended to 17 months where in any case this is impracticable in exceptional circumstances. In the meantime, according to regulations I/8 and I/9 of the 1988 SOLAS Protocol, the said appliances shall be subjected to an annual or a periodical survey within 3 months before or after each anniversary of the Cargo Ship Safety Equipment Certificate and of the Cargo Ship Safety Radio Certificate, respectively, or the Cargo Ship Safety Certificate, i.e. maximum 18 months interval.

.....omission.....

The Committee, in pursuance of the HSSC's objectives to "simplify survey requirements, thereby reducing the burden on Administrations, operators of ships and the crews of ships", decided that:

"the servicing intervals of life-saving appliances and radiocommunication equipment for ships, whose flag States implement the HSSC, may be in concert with the terms of the HSSC annual, periodical and renewal survey stipulated in the 1988 SOLAS Protocol notwithstanding regulations III/20.8, III/20.9 and IV/15.9 of the 1974 SOLAS Convention, as amended".

Interpretation

The annual test of the EPIRBs shall be carried out within the "time window" of the prescribed survey, but not later than the date of completion of the survey for endorsement / renewal of the relevant Certificate.

End of Document
