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

**Clarification on examining and checking the operation of
survival craft portable two-way VHF radiotelephone apparatus**

**Submitted by the International Association of Classification Societies (IACS) and the
Comité International Radio-Maritime (CIRM)**

SUMMARY

Executive summary: This document seeks clarification on whether expired primary batteries can be used to examine and check the operation of survival craft portable two-way VHF radiotelephone apparatus

Strategic direction, if applicable: 6

Output: 6.1

Action to be taken: Paragraph 10

Related documents: SOLAS regulation III/6.2.1.1; resolutions A.1120(30) and MSC.149(77)

Introduction

1 Conducting functional tests of survival craft portable two-way VHF radiotelephone apparatus are considered to be a routine maintenance item addressed as part of a ship's Safety Management System.

2 Recently, a port State control inspection determined the use of expired primary batteries to examine and check the operation of VHF radiotelephone apparatus as a deficiency and, subsequently, the ship was detained despite the presence of three valid dedicated primary batteries as required in the *Revised Recommendation on Performance standards for survival craft portable two-way VHF radiotelephone apparatus* (resolution MSC.149(77)). The expired batteries were clearly marked and separately stowed so that they could not be confused with dedicated primary batteries.

Background

3 SOLAS regulation III/6.2.1.1 states:

"At least 3 two-way VHF radiotelephone apparatus shall be provided on every passenger ship and on every cargo ship of 500 gross tonnage and upwards. At least 2 two-way VHF radiotelephone apparatus shall be provided on every cargo ship of 300 gross tonnage and upwards but less than 500 gross tonnage. Such apparatus shall conform to performance standards not inferior to those adopted by the Organization.* If a fixed two-way VHF radiotelephone apparatus is fitted in a survival craft it shall conform to performance standards not inferior to those adopted by the Organization.*"

* Refer to *Performance standards for survival craft two-way VHF radiotelephone apparatus* (resolution A.809(19), as it may be amended, annex 1 or annex 2, as applicable) and resolution MSC.149(77).

4 Paragraphs 12.2, 12.5, 12.6 of the annex to resolution MSC.149(77) on *Revised Recommendation on Performance standards for survival craft portable two-way VHF radiotelephone apparatus*, state:

"12.2 Equipment for which the source of energy is intended to be user-replaceable should be provided with a dedicated primary battery for use in the event of a distress situation. This battery should be equipped with a non-replaceable seal to indicate that it has not been used."

"12.5 Primary batteries should have a shelf life of at least 2 years, and if identified to be user-replaceable should be of a colour or marking as defined in 2.3.13."

"12.6 Batteries not intended for use in the event of a distress situation should be of a colour or marking such that they cannot be confused with batteries intended for such use."

5 Paragraph (EA) 1.2.2.29 of the *Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2017* (resolution A.1120(30)) states:

"(EA) 1.2.2.29 examining and checking the operation of two-way VHF radiotelephone apparatus and search and rescue locating devices (SOLAS 74/88/08 reg. III/6);"

Discussion

6 The understanding of the co-sponsors is that the use of expired primary batteries compliant with the requirements of paragraph 12.6 of resolution MSC.149(77) is acceptable and does not constitute a violation of the requirements in force, based on the following rationale.

7 According to the provisions of paragraph 12.6 of resolution MSC.149(77), batteries not intended for use in the event of a distress situation are permitted for use on board.

8 The purpose of examining and checking the operation of two-way VHF radiotelephone apparatus is to verify the apparatus itself is in a satisfactory condition. As such, any battery, other than a dedicated primary sealed battery, such as a secondary rechargeable or primary unsealed battery, may be used for this purpose.

9 Radio manufacturers permit the testing of portable two-way VHF radiotelephone apparatus using expired primary batteries. It is considered that modern VHF equipment is robust and will not be damaged by the use of low voltage batteries and is designed to undergo a controlled shutdown if the voltage supplied falls below a defined limit.

Action requested of the Sub-Committee

10 The Sub-Committee is invited to:

- .1 consider the foregoing and particularly the understanding as discussed in paragraphs 6 to 9 above;
 - .2 provide clarification on whether expired primary batteries, which comply with the requirements of paragraph 12.6 of resolution MSC.149(77), can be used to examine and check the operation of two-way VHF radiotelephone apparatus; and
 - .3 take action as appropriate.
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