

Subject:	Annual testing of the VDR, S-VDR, AIS and EPIRBs
To:	Shipowners, Companies, Operators, Recognized Organizations, Shore Based Maintenance Entities, Surveyors and Inspectors, Masters and Skippers of Portuguese flagged vessels

References: SOLAS Regulation IV/15.9 on Maintenance Requirements for Satellite EPIRBs; SOLAS Regulation V/18.8 and 18.9 on Approval, surveys and performance standards of navigational systems and equipment and voyage data recorder (VDR) for the annual testing of VDR and AIS; Circular MSC.1/Circ.955 “Servicing of Life Saving Appliances and Radiocommunication Equipment under the Harmonized System of Survey and Certification (HSSC)”; Circular MSC.1/Circ.1222 “Guidelines on annual testing of Voyage Data Recorders (VDR) and Simplified Voyage Data Recorders (S-VDR)”; Circular MSC.1/Circ.1252 “Guidelines on annual testing of Automatic Identification System (AIS)”; Decree-Law n.º 106/2004 of 8 May, which applies the SOLAS Convention, its protocol and the current amendments to national vessels; Decree-Law n.º 248/2000 of 3 October establishing a safety regime for fishing vessels of 24 meters and above; Decree-Law n.º 293/2001 of 2 November, which extends to passengers vessels in domestic voyages the application of certain rules of the SOLAS Convention.

1. OBJECTIVE

The aim of this Circular is to inform about the interpretation of the Portuguese Maritime Administration, DGRM, from this point and onwards the **Administration**, of the timeframe to perform the annual testing of VDRs, S-VDRs, AIS and EPIRBs under the *chapeau* of the Harmonized System of Survey and Certification, HSSC, (A.29/Res.1104) and the Circulars mentioned in References.

2. ANNUAL TEST OF EPIRBs

2.1 Regulation IV/15 paragraph 9 of the SOLAS Convention, in its most recent updated version, reads: "Satellite EPIRBs shall be:

2.1.1 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:

2.1.1.1 On passenger ships, within 3 months before the expiry date of the Passenger Ship Safety Certificate; and

2.1.1.2 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

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

2.2 The second subparagraph of paragraph 1 of Circular MSC.1/Circ.955 states: "The servicing intervals of the aforementioned life-saving appliances (inflatable liferafts, inflatable lifejackets, marine evacuation systems, inflated rescue boats, hydrostatic release units) 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."

2.3 Moreover, paragraph 4 of this same document states: "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:

2.3.1 "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".

2.4 The interpretation of the Administration on this subject is that the annual survey due to 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 or renewal of the relevant Certificate.

3. ANNUAL TEST OF VDR OR S-VDR

3.1 Regulation V/18 paragraph 8 of the SOLAS Convention, in its most recent updated version, reads: "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."

3.2 Paragraph 3 of the annex to Circular 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.)"

3.3 The Administration interpretation on this subject is that the annual test of either VDRs or S-VDRs shall be carried out within the "time window" of the annual or periodical or renewal survey under the Harmonized System of Survey and Certification (HSSC), but not later than the date of completion of the survey for endorsement or renewal of the relevant Certificate.

4. ANNUAL TEST OF AIS

4.1 Regulation V/18 paragraph 9 of the SOLAS Convention, in its most recent updated version reads: "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.”

4.2 Paragraph 3 of the annex to Circular 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:

4.2.1 Up to 3 months before the due date of the passenger ship renewal survey or the cargo ship safety equipment renewal survey; and

4.2.2 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).”

4.3 The Administration interpretation on this subject is that the annual test of the AIS shall be carried out within the "time window" of the annual or periodical or renewal survey under the Harmonized System of Survey and Certification (HSSC), but not later than the date of completion of the survey for endorsement or renewal of the relevant Certificate.”

Lisbon, 05 January 2017

The Director of the Maritime Administration Services Directorate

For further information please contact:

Direção Geral de Recursos Naturais, Segurança e Serviços Marítimos

Avenida Brasília 1449 - 030 LISBOA, PORTUGAL

Tel: (+351) 213 035 700

Fax: (+351) 213 035 702

Linha Azul: (+351) 21 3035703

www.dgrm.mm.gov.pt

E-mail: dsam.secretariado@dgrm.mm.gov.pt