



ST. VINCENT AND THE GRENADINES

MARITIME ADMINISTRATION

CIRCULAR N° SOL 014 – Rev. 4

SOLAS 74-CHAPTER V – REG. 20 AS AMENDED BY MSC 170(79), MSC 214(81) AND MSC 333 (90) VOYAGE DATA RECORDERS

TO: **RECOGNIZED ORGANIZATIONS (RO), FLAG STATE INSPECTORS, SHIP OWNERS, SHIPS' OPERATORS AND MANAGERS**

APPLICABLE TO: ALL SHIPS TO WHICH SOLAS 74 CH.V Reg.20 IS APPLICABLE

EFFECTIVE AS FROM: Date of this Circular

21st January 2020

As stated by SOLAS 74 - Ch. V - Reg. 20 as amended by MSC 170(79):

- 1 *Ships, when engaged on international voyages, subject to the provisions of regulation 1.4, shall be fitted with a voyage data recorder (VDR) as follows:
.1 Passenger ships constructed on or after 1 July 2002;
.2 Ro-Ro passenger ships constructed before 1 July 2002, not later than the first survey on or after 1 July 2002;
.3 Passenger ships, other than ro-ro passenger ships, constructed before 1 July 2002, not later than 1 January 2004; and
.4 Ships, other than passenger ships, of 3,000 gross tonnage and upwards constructed on or after 1 July 2002.*
- 2 *Cargo ships, when engaged on international voyages, shall be fitted with a VDR which may be a simplified voyage data recorder (S-VDR) as follows:
.1 In the case of cargo ships of 20,000 gross tonnage and upwards constructed before 1 July 2002, at the first scheduled dry-docking after 1 July 2006 but not later than 1 July 2009;
.2 In the case of cargo ships of 3,000 gross tonnage and upwards but less than 20,000 gross tonnage constructed before 1 July 2002, at the first scheduled dry-docking after 1 July 2007 but not later than 1 July 2010; and
.3 Administrations may exempt cargo ships from the application of the requirements of subparagraphs .1 and .2 when such ships will be taken permanently out of service within two years after the implementation date specified in subparagraphs .1 and .2 above.*
- 3 *Administrations may exempt ships, other than ro-ro passenger ships, constructed before 1 July 2002 from being fitted with a VDR where it can be demonstrated that interfacing a VDR with the existing equipment on the ship is unreasonable and impracticable.*

This Administration informs the Shipowners, Ships' Operators and Managers that:

- The exemption mentioned in paragraph 2, subparagraph .3 should be requested implementing our Circular GEN 001;
- A written declaration that the ship will be taken permanently out of service within two (2) years after the implementation date specified in paragraph 2, subparagraphs 2. or 3. should be provided.
- When the requested exemption is issued, if the ship, due to very exceptional/particular circumstances, is maintained into service after the implementation date specified in paragraph 2, subparagraphs .2 or .3:
 1. A detailed written explanation should be provided.
 2. This Administration reserves the right to evaluate/accept the written explanation;
 3. In case of positive evaluation/acceptance of the written explanation, the VDR or S-VDR should be installed and a very high penalty (calculated on a case by case basis) will be assigned.

VDR/S-VDR Performance Standards

The Maritime Safety Committee adopted a revised recommendation on performance standards for voyage data recorders (VDRs) refer resolution MSC 333 (90).

This resolution recommends that VDRs:

- installed on or after 1 July 2014, are required to be approved to the IMO Resolution **MSC.333(90)**; and
- if installed before 1st July 2014, they should conform to performance standards not inferior to those specified in the Annex to Resolution **A.861(20)** as amended by Resolution MSC.214(81).

The interpretation of the words "installed on or after 1st July 2014" is as follows:

- a) For ships for which the building contract is placed on or after 1st July 2014, or in the absence of the contract, constructed on or after 1st July 2014, "installed on or after 1st July 2014" means any installation on the ship; and
- b) for ships other than those described in a) above, "installed on 1st July 2014" means a contractual delivery date for the equipment or, in the absence of a contractual delivery date, the actual delivery of the equipment to the ship on or after 1st July 2014.

S-VDR should be type approved and installed according the requirements of IMO Performance Standard MSC.163 (78) as amended by resolution MSC.214(81) for S-VDR.

The final installation should be tested according to the manufacturer's instructions. Before the surveyor attends the test, the VDR should record for at least twelve (12) hours with all sensor inputs active (in operation) before the recorded data is presented to the surveyor.

Annual testing of VDR/S-VDR

The requirements for VDR and S-VDR systems to be subject of an annual testing has been approved by the revision of SOLAS Regulation V/20 and established by Regulation V/18.8 as amended.

The purpose of an annual performance test is to determine that a VDR/S-VDR is operational as defined in the manufacturer's specification.

VDR including all sensors, should have an annual performance test. The test should be conducted in line with Revised Guidelines on Annual Testing of Voyage Data Recorders (VDR) and Simplified Voyage Data Recorders (S-VDR)- MSC.1/Circ.1222/Rev.1 and for VDR float-free capsules approved in accordance with IMO Res. MSC.333(90), annual performance testing includes an examination according to MSC.1/Circ.1040/Rev.1 – “Revised Guidelines on Annual Testing of Satellite EPIRBs”.

The test should be conducted by an approved service supplier to verify the accuracy, duration and recoverability of the recorded data.

The service supplier should be approved by the RO of this Administration. The Surveyor should check that the vessel has a copy of a valid Certificate of Conformity (COC) which should contain the following information:

- Name and IMO number of the ship;
- Date and place of successfully passed testing;
- Make, model and serial number of the VDR;
- Name and address of service supplier;
- Name and signature of the technician carrying out the annual performance test; and
- Service supplier’s approval certificate number and the date of expiry of the service supplier’s Certificate.

Discrepancy from the requirements/interpretations discovered during the annual testing should be clarified with the RO before the issue of the Certificate of Conformity.

Preservation of evidence in case of casualty

It is needless to mention the importance of the data recovered from the VDR in case of casualty as it will assist the investigators to identify the root cause of the casualty.

Shipowners should issue standing orders to their crew in order to ensure the timely preservation of the evidence stored in the VDR/S-VDR.

In case of sinking of a ship, the owners should take all necessary actions and cooperate with the investigating Administration in recovering and preserving the protective capsule and give all decoding instructions which are necessary to recover the stored data.

Initial and annual testing of the VDR/S-VDR is of paramount importance as it will confirm that the system is in proper working condition.

Revision History

Revision 4

VDR/S-VDR Performance Standards, revised

Annual testing of VDR/S-VDR, revised

Initial Testing of VDR/S-VDR installed after 1st July 2008, deleted

Annual testing of VDR/S-VDR installed after 1st July 2008, deleted