

## MCN-23-02 | 12 December 2023

## Notice to: Ship Owners / Managers / Operators / Surveyors / Auditors

This circular is issued to advise that the IMO, under Resolution MSC.496(105), has adopted amendments to SOLAS Chapter IV on Radio Communications. These amendments, which will enter into force on 01 January 2024, allow the use of modern communication systems in the GMDSS, especially in the area A3.

## Key points to note are:

- 1. Although it is not clear from these amendments or any official interpretation of them, ACS considers that in practical terms, ships will have to comply from the first radio survey on or after 01 Jan 2024.
- 2. References to Inmarsat coverage have been replaced with the term "Recognized Mobile Satellite Service" (RMSS).
- 3. In addition to maritime mobile satellite services provided by INMARSAT, the IMO has recognized the maritime mobile satellite services of IRIDIUM SATELLITE LLC.
  - Note: Iridium Satellite System is acceptable as part of GMDSS, subject to acceptance of the flag Administration.
- 4. Although the definition of sea areas A1, A2 and A4 remain unchanged, the definition of "Sea Area A3" has changed. Sea Area A3 now means 'an area, excluding sea areas A1 and A2, within the coverage of a recognised mobile satellite service (RMSS) supported by the ship earth station (SES) carried on board, in which continuous alerting is available'.
  - Note: Sea Area A3 is therefore variable depending on the type of RMSS SES installed onboard.
- 5. For a ship certified to operate in sea area A3, the Cargo Ship Safety Radio Certificate is to indicate the recognized mobile satellite service in brackets (INMARSAT / IRIDIUM).

- 6. Transmitting and receiving distress and safety communications using direct-printing telegraphy (NBDP) is no longer a part of GMDSS requirements and hence need not be fitted on board (redundant).
- 7. Requirements for Radar SART / AIS-SART and two two-way VHF radiotelephone apparatus have been moved from SOLAS Ch-III, Life Saving Appliances and Arrangements to SOLAS Ch-IV Reg. 7.2 and 7.3.
- 8. Sea area A1 requires a satellite EPIRB; VHF-EPIRB can no longer be accepted.
- 9. The relevant amended Safety Radio Certificate Form and Record of Equipment (Form R) are included in the amendments.

A list of required GMDSS Equipment for various sea areas can be found as attached to this circular.

Notwithstanding the above, on 30 June 2023, IMO issued MSC.1/Circ.1676 about Delays affecting the Availability of New GMDSS Equipment. In particular, and in accordance with MSC.511(105), MSC.512(105), and MSC.513(105) the performance standards for new equipment of VHF, MF-HF, and Inm-C respectively have been adopted for new installations on or after 1 Jan 2024. However, some performance standards incorporate new features, which still require specifications from other organizations. Considering that it would be unrealistic for new equipment to comply with new performance standards by 1 Jan 2024, the Committee invited Member States to consider continuation of new installations until 1 Jan 2028 with the existing performance standards i.e. in accordance with Res. A.803(19), A.806(19), and A.807(19) for new equipment of VHF, MF-HF, and Inm-C respectively. Flag Administration consent is required in this respect.

## Act now

All Ship Owners / Managers / Operators / Surveyors / Auditors should be guided by the above and ensure compliance with the requirements.