

Port State Control – Information Notice No.5 of 2009

The purpose of this notice is to advise shipowners, operators, managers and Masters of Isle of Man registered ships of the following;

Guidance for Masters and Officers during PSC Inspections on checking for compliance with Long Range Identification and Tracking (LRIT)

The information below is provided as basic guidance to verify compliance with the requirements of SOLAS for LRIT.

LRIT equipment is implemented through SOLAS Ch. V/19-1 and MSC Res 263(84) which requires passenger ships, cargo ships (including high speed craft) over 300 tons, and Mobile Offshore Drilling Unit (MODU), to send LRIT position information at least every 6 hours.

Ships fitted with Automatic Identification System (AIS) and operated exclusively within sea area A1 are not required to comply with LRIT. Sea area A1 is defined by SOLAS Ch. IV/2.1.12 as;

“an area within the radiotelephone coverage of at least one VHF coast station in which continuous DSC alerting is available, as may be defined by a Contracting Government”.

Ships constructed before 31 December 2008 must be fitted with LRIT equipment no later than the first radio inspection after 31 December 2008, and no later than 31st December 2009

Flag States are expected to establish a LRIT Data Centre, either on a national basis, or on a regional or co-operative basis with other flag States, and notify the IMO of it. In turn, these National Data Centres will forward the LRIT data from ships entitled to fly their flag, to the International LRIT Data Exchange. Port States are entitled to receive the LRIT information from foreign ships that have indicated their intention to enter a port. When foreign ships are not transmitting LRIT information there should be procedures to advise PSCOs of noncompliance.

In most cases a stand-alone Inmarsat C or Inmarsat Mini-C terminal used for GMDSS or Ship Security Alert System will function as the LRIT terminal, but other equipment may be carried for the LRIT function (ie. Inmarsat D+ or Iridium).

What to expect at a PSC inspection

A PSCO should first establish the sea area the ship is certified to operate in. This verification shall ensure that the ship is subject to the LRIT regulation in relation to its ship type and tonnage. Further, it shall demonstrate whether the vessel has undergone an annual radio survey and inspection after 31 December 2008.

After the certificate check, the PSCO shall verify that:

- the Record of Equipment (Form E, P or C) has LRIT checked as required.
- a Statement of Conformity / Conformance Test Report (see MSC.1/Circ.1296 or MSC.1 Circ.1307) is onboard.

- the equipment identified by ship's representative as the designated LRIT terminal is switched on and operational. In exceptional circumstances and for shortest duration possible LRIT shall be capable of being switched off or may transmit less frequently. Reference SOLAS Ch. V/19-1.7.2 and MSC Res.263 (84) para 4.4.1

If there are clear grounds to carry out a more detailed inspection

In case of doubt or reports of malfunctioning of the LRIT installation the flag state administration may be contacted to determine if the ship's LRIT information has been reliably relayed to the LRIT Data Centre.

Equipment used for the purpose of transmitting LRIT data, shall comply with the performance standards and operational requirements.

Clear grounds, which may warrant a more detailed inspection of equipment used for LRIT may comprise of the following:

- Verification of the power supply which should be connected to the main source of energy and the emergency source of energy, there is no requirement for an un-interrupted power source. If the LRIT is part of the GMDSS radio-installation the power supply should conform GMDSS regulations.
- Where the model offers the possibility: ascertain that automated messages have been sent and can be sent at least at intervals of maximum 6 hours;
- Where the model offers the possibility: Verification that LRIT equipment is interfaced directly to the ship borne global navigation satellite system equipment, or has internal positioning capability;
- Inspection of the "record of navigational activities" log to establish if and when the installation has been switched off and if this has been reported to the flag state administration (SOLAS Ch. V/19-1.7.2 and MSC Res.263 (84) para 4.4.1)

In case of a recent transfer of flag the PSCO may further ensure that:

- A Conformance test report has been re-issued if the new flag State does not recognise the issuing body of the existing conformance test report. or
- A new Conformance test has been carried out by the Application Service Provider (ASP) on behalf of the administration before issuance of a new test report and radio certificate.

Deficiencies which may warrant detention

A PSCO should use his/her professional judgment to determine whether to detain the ship until any noted deficiencies are corrected or to permit a vessel to sail with deficiencies.

In order to assist the PSCO in the use of these guidelines, the following deficiencies should be considered to be of such nature that they may warrant the detention of a ship:

- Absence of a valid LRIT Conformance test report;
- The master or the crew are not familiar with essential shipboard operational procedures relating to LRIT.

- The ship transmits no LRIT information and has been advised of the failure to transmit.

PSCO's should not unduly delay or detain a ship as pursuant to provisions of SOLAS Regulations Ch. I/9 and Ch. V/16¹, if the vessel has a conformance test report and radio certificate is valid.

PSCO's are advised that a Flag State may issue a short term Radio Certificate. This could happen if, following a successful inspection for the issuance of a Conformity Test report, the ASP has not been able to issue a document yet, or if the ASP is not able to perform a conformance test in due time upon request of the ship owner.

PSCO's are also advised that ships should not be detained if the LRIT installation on board works, but the shore side installation or organization is not able to receive, relay or process the information.

¹ SOLAS Ch.V/16: while all reasonable steps shall be taken to maintain the equipment required by this chapter in efficient working order, malfunctions of that equipment shall not be considered as making the ship unseaworthy or as a reason for delaying the ship in ports where repair facilities are not readily available, provided suitable arrangements are made by the master to take the inoperative equipment or unavailable information into account in planning and executing a safe voyage to a port where repairs can take place.

References:

SOLAS Chapter V 19-1
MSC 202 (81)
MSC 263 (84)
IMO Res A.694 (17)
MSC.1 Circ.1256
MSC.1 Circ.1257
MSC.1 Circ.1296 - (revokes MSC.1 Circ.1257)
MSC.1 Circ.1298 - (revokes MSC.1 Circ.1256)
MSC.1 Circ.1299
MSC.1 Circ.1307 - (revokes MSC.1 Circ.1296)
MSC.1 Circ.1308 - (revokes MSC.1 Circ.1297)
MSC.1 Circ.1309

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