

	CIRCULAR 2011-001 (Rev1)		
	DEPARTMENT OF MARINE SERVICES AND MERCHANT SHIPPING (ADOMS)		
	Bridge Navigational Watch Alarm Systems (BNWAS)	Ref	MSC.1 Circ 1290 Res. MSC.128(75) Res. MSC.282(86) MSC.350(92)

**Companies operating ships under the flag of Antigua and Barbuda.
Ships registered under the flag of Antigua and Barbuda.
Authorised Recognised Organisations (ROs)**

1. This Circular was previously issued as Circular 02-001-11.
2. Amendments to SOLAS effective from 1st January 2011 require all vessels to be fitted with Bridge Navigational Watch Alarm Systems (BNWAS). The IMO also adopted a performance standard for BNWAS which is set out in Resolution MSC.128(75). The installation dates by ship size and type are phased in as set out in this Circular.

At the 92nd Session of the Maritime Safety Committee in June 2013 the Committee recognised that the amendment creating the BNWAS system requirements was worded in such a manner that ships built before 1st July 2002 could be seen as not required to carry BNWAS. The Committee was clear that the intention of the IMO was that the BNWAS carriage requirements should apply to all vessels. Accordingly the Committee approved resolution MSC. 350(92) which corrects this error.

This Resolution adds an extra sub paragraph .4 to the existing Regulation 19.1.2 (which deals with requirements for ships constructed before 1st July 2002.). The new sub-paragraph makes it clear that ships constructed before 1st July 2002 must also be fitted with BNWAS but because of the delay in this clarification, the dates of application have been extended.

3. This Circular sets out the position of ADOMS in so far as any delay in fitting of BNWAS may be considered.

4. Dates of application (ships constructed on or after 1st July 2002).

SOLAS Chapter V Regulation 19 is clear that for ships constructed on or after 1st July 2002 the following application dates for the BNWAS requirements apply.

- a. **1st July 2011:**
For new cargo ships of 150 GT and above and new passenger ships of all sizes constructed on or after 1st July 2011.
- b. **The first safety equipment or passenger ship safety survey after 1st July 2012.**
For passenger ships of all sizes and cargo ships of over 3000 GT constructed before 1st July 2011.
- c. **The first safety equipment survey after 1st July 2013.**
For cargo ships of 500 GT and above but less than 3000 gross tonnage constructed before 1st July 2011,

d. **The first safety equipment survey after 1st July 2014.**

For cargo ships of 150 GT and above but less than 500 GT, constructed before 1st July 2011.

5. Dates of application, (Ships constructed before 1st July 2002).

Resolution MSC.350(92) was adopted by the MSC and is intended to be deemed accepted on 1st July 2014 if there are no objections with a view to entry into force on 1st January 2015. The amended dates of application in the Resolution – which are amendments to the Convention, are not in force until 1st January 2015.

The changes introduced by Resolution MSC.350 (92) take effect from 1st January 2015. Therefore, as worded, Regulation 19.2.2 does not apply to ships constructed before 1st July 2002 and these ships do not require to be fitted with BNWAS until the dates specified in Resolution MSC.350(92).

The amended dates in the Resolution are:

- a. **The first passenger ship safety survey after 1st January 2016.**
For passenger ships irrespective of size.
- b. **The first Safety Equipment survey after 1st January 2016;**
For cargo ships of 3000 GT and upwards.
- c. **The first Safety Equipment survey after 1st January 2017;**
For cargo ships of 500 GT and upwards but less than 3000 GT.
- d. **The first safety equipment survey after 1st January 2018;**
For cargo ships of 150 GT and upwards but less than 500 GT.

6. ADOMS Recommendations.

Although the IMO have adopted Resolution MSC.350 (92) the clear intention of the IMO was and has been to require all ships to be fitted with BNWAS and the intention of the original amendment applying from 1st January 2011 was that all ships would be fitted by the dates set out currently in SOLAS.

While ADOMS can accept the correction by the IMO the administration would strongly **recommend that all Antigua and Barbuda ships should comply with the original implementation dates.**

Where no BNWAS is installed on a ship constructed before 1 July 2002 Consideration may be given to exempt it from the application of the carriage requirement when that ship will be taken permanently out of service within two years after the specified implementation date

7. BNWAS installed prior to 1st July 2011 that meet the MSC.128(75) standard.

Existing installations that have documentary evidence of meeting the performance standard in IMO Resolution MSC.128(75) may continue in service. Ships should ensure that documentary evidence of the system's compliance with the performance standard is available

on board. New installations should be accompanied by documentary evidence available on board to show that the equipment complies with the performance standard.

8. BNWAS installed prior to 1st July 2011 that do not meet the MSC.128(75) performance standard .

The amendments to the Convention (Chapter V, Reg. 19.2.2.4) allow the Administration to exempt existing BNWAS systems that do not fully comply with the performance standards adopted by the IMO on such conditions as it sees fit.

The Administration of Antigua and Barbuda has decided that it will accept by exemption existing installations fitted before 1st July 2011 where:

- a. The installation complies with the German national standard notified to the IMO in **62321.3/1-SOLAS-Kap V/19, SLS 14/Circ. Dated 4th November 2011**, and there is documentary evidence on board of this compliance, provided that, where there is an option for a 1.5 minute dormant period, this option is not used and the ship's procedures ensure that it is not used. Or
- b. The installation meets the following minimum standards;
 - i. The operational modes can be switched by a key protected or password protected selection system between "on" and "off",
 - ii. Once operational the system remains dormant for periods which can be selected between 3 minutes and 12 minutes. (Where a 1.5 minute option is provided this should be disabled if possible and if not disabled it should be clearly marked "not to be used" and the ship's operational procedures should ensure this.)
 - iii. At the end of the dormant period there is a visual indication to the watchkeeper on the bridge.
 - iv. 15 Seconds after the visual indication, if the system is not reset by the watchkeeper, there should be an audible indication on the bridge.
 - v. 15 Seconds after the bridge audible indication, if the system is not reset, there should be a second stage audible alarm at the backup officer or the Master's cabin.
 - vi. Between 90 and 180 seconds after the second stage audible alarm, if the system is not reset, there should be a third stage audible alarm at the locations of other crew members. The third stage alarm should be distinct from the fire alarm / general alarm if practicable; however in existing installations where the design of the system is such that it is not possible to separate the BNWAS alarm from the general alarm, the use of the general alarm for the BNWAS 3rd Stage audible alarm will be accepted.

- vii. The locations of the reset buttons on the bridge are only in positions from where it is possible to provide a proper lookout.
 - viii. The system is supplied from both main power and from emergency power.
 - ix. The system is suitable for installation on board in terms of electromagnetic compatibility. This may be ascertained by either evidence of compliance with a suitable standard (IE60945, IACS UR E10) or where there is no documentation the attending surveyor is able to establish that there is sound evidence that it has been in operation for a period of time with no compatibility issues affecting other bridge equipment and that the magnetic compass performance, as demonstrated by records of deviations on a full range of headings, is demonstrated to be unaffected.
- c. Each of the recognised organisations for Antigua and Barbuda is authorised to issue exemptions applicable to ship's Cargo Ship Safety Equipment Certificates "if previously authorised by the Administration". This Circular serves as authorisation to the recognised organisations to issue exemptions where required for BNWAS systems fitted prior to 1st July 2011 and which do not have documentary evidence of meeting the performance standards in MSC.128(75) if the existing systems meet either of the criteria stated above.

In any case where an RO issues an exemption to an Antigua and Barbuda ship in accordance with this arrangement, a copy of the exemption in electronic form should be set to both the ADOMS St. John's office: technical@abregistry.ag and to the ADOMS Oldenburg office: info@antiguamarine.com

It is also considered acceptable that; even if under the revised implementation date in section 5, a vessel is not yet required to fit BNWAS; an exemption may still be issued for an existing system in accordance with this section. Such exemption certificates may be issued after carriage of a BNWAS becomes mandatory for the ship based on its construction date, as per the implementation dates in SOLAS as outlined in section 4 and 5 above.

9. Use of the system in practice.

The SOLAS amendments require that the **BNWAS should be in operation whenever the ship is underway at sea**. The Administration defines this to mean at sea when normal watch-keeping is undertaken and does not define this to include:

- a. When the ship is under pilotage,
- b. Times when the bridge is manned by more than one officer such as when in confined waters or similar when the BNWAS could distract from effective bridge team management.

June 2014.