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Postal Address: 150, Gr. Lambraki Str.

Postal Code: 185 18, Piraeus

Contact Person: And. ZARNAVELIS

Tel: 210 419 1863

Fax: 210 413 7997

CIRCULAR LETTER

**This circular updates and replaces Circular Letter
No.4339.20/02/12/17.02.2012 issued by the Branch for the
Inspection of Merchant Ships (KEEP/DEP/DMK-DEP/ENESPY)**

SUBJECT: Installation and specifications of the Bridge Navigational Watch
Alarm System (BNWAS)

REF:

- a) Regulation V/19 of the 1974 SOLAS Convention as in force at present
- b) IMO Resolution MSC 128 (75) of May 20, 2002.
- c) IMO Resolution MSC 282 (86) of June 5, 2009.
- d) IMO Resolution MSC 350 (92) of June 21, 2013.
- e) Presidential Decree No.175/1988 (Off. Gov. Gaz. 77A).
- f) Document No. 4339.20/03/10/24.11.2010 issued by the
YTHYNA/KEEP/DMK/ENESPY.
- g) Circular Letter No. 4339.20/02/12/17.02.2012
- h) Document

1. Scope

The present circular order provides instructions and clarifications for the installation and specifications of the Bridge Navigational Watch Alarm System (BNWAS) according to the requirements of the SOLAS Regulation (REF item (a) hereinabove) as amended by virtue of IMO Resolutions MSC 282 and MSC 350 adopted on 05.06.2009 and 21.06.2013 respectively (REF items (c) and (d) hereinabove).

2. Introduction

According to IMO Resolution referred to under REF item (c) hereinabove, which entered into force on January 1, 2011, two new subparagraphs were added, 2.2.3 and 2.2.4, concerning the installation and operation of the Bridge Navigational Watch Alarm System (BNWAS) aboard ships.

IMO Resolution MSC 350 (92), which shall enter into force on January 1, 2015 amends the time-limit for compliance for ships constructed before July 1, 2002, while in the event of ships which shall be taken permanently out of service, an exemption from the requirement to comply shall be granted.

Ships must be fitted with the BNWAS within the time-limits set in SOLAS Regulation V/19. The purpose of this system is to monitor bridge activity and detect operator (Officer On Watch) disability which could lead to a marine accident.

Instructions for the implementation, installation and operation of the BNWAS aboard Greek-flagged ships are given in detail hereinbelow in order to provide assistance to stakeholders (Ship managers, ship Masters, Authorized Organizations, etc).

3. Implementation

Without prejudice to section 4 hereof, ships listed in the table below shall ensure to be fitted with a BNWAS **not later than the first survey** for issuance / renewal / validation of a Passenger Ship Safety Certificate or a Cargo Ship Safety Certificate, or the General Inspection Protocol **after** the date specified in the table below:

<i>Ship type</i>	<i>Construction (keel laying) date</i>	<i>Gross tonnage*</i>	<i>Implementation date</i>
Passenger Ships	On or after July 1, 2011	Irrespective of size	Immediately
Passenger Ships	On or after July 1, 2002 and until June 30, 2011	Irrespective of size	July 1, 2012
Passenger Ships	Before July 1, 2002	Irrespective of size	January 1, 2016
Cargo Ships	On or after July 1, 2011	150 gt and over	Immediately
Cargo Ships	On or after July 1, 2002 and	3000 gt and over	July 1, 2012

	until June 30, 2011		
Cargo Ships	On or after July 1, 2002 and until June 30, 2011	From 500 to 2999 gt	July 1, 2013
Cargo Ships	On or after July 1, 2002 and until June 30, 2011	From 150 to 499 gt	July 1, 2014
Cargo Ships	Before July 1, 2002	3000 gt and over	January 1, 2016
Cargo Ships	Before July 1, 2002	From 500 to 2999 gt	January 1, 2017
Cargo Ships	Before July 1, 2002	From 150 to 499 gt	January 1, 2018

*For the implementation of the above, as regards gross tonnage of ships engaged on international voyages with keel laying date up to December 31, 1985 the national gross tonnage (GRT) shall be into account and not the international (GT) according to REF item (a) hereinabove.

4. Exemptions – Exceptions

Ships which are to be taken permanently out of service within two years after the mandatory implementation date (as per ship type and gross tonnage) are exempt from the requirement to be fitted with a BNWAS. In such a case, an exemption certificate shall be issued by the ship's certification body while all Safety Certificates issued for said ship shall remain in full force and effect for a period not exceeding two years after the date of the mandatory implementation on a case-by-case basis.

In addition, pursuant to Regulation V/1.2 and 1.4 of Chapter V of the 1974 SOLAS Convention as in force, the following types of ship are exempt from the BNWAS carriage requirement:

- a) Ships engaged on international voyages of less than 150 gross tons;
- b) Passenger ships engaged on domestic voyages not subject to Directive 2009/45/EC of less than 500 gross tonnage;
- c) Cargo ships engaged on domestic voyages of less than 500 gross tonnage;
- d) AI ships engaged on domestic voyages having a General Inspection Protocol on board and operating within protected or specially protected areas.

5. Existing BNWAS installations

Provided that a Bridge Navigational Watch Alarm System which does not fully meet the requirements set out in REF item (b) hereinabove has been installed on ships prior to July 1, 2011, such BNWAS may be approved by the statutory certificate issuing body if it conforms to the minimum performance standards laid down in our document under REF item (f) hereinabove. These minimum standards are listed below:

- i. Paragraph 4.1.1.1 of REF item (b) hereinabove. If the BNWAS cannot be brought into operation automatically whenever the ship's heading or track control system is activated, care shall be taken so that the system be activated manually (e.g. procedure through ISM).
- ii. Paragraphs, 4.1.2, 4.1.3.1, 4.1.3.2, 4.2, 4.4, 5.1.1, 5.1.2, 5.2.2, 6.3 of REF item (b) hereinabove.
- iii. As regards electromagnetic compatibility

6. Newly installed BNWAS

All systems to be installed aboard ships must meet the requirements of REF item (b) hereinabove. The system's installation and operation shall be certified by the statutory certificate issuing body. Prior to such certifications, the managing company shall submit to the issuing body an installation dossier which shall contain the following documentation:

- i. A certificate issued by the system's installation technician or manufacturer attesting that the system operates smoothly according to the specifications of REF item (b) hereinabove.
- ii. A layout drawing showing the positions on the ship's bridge where sources of the system's visual and acoustic indications (1st stage) are installed; likewise, the positions beyond the ship's bridge where sources of the system's acoustic indication (2nd and 3rd stage), and the position (or positions) of reset devices and malfunction indicators.
- iii. The system's manual (printed or digital form) available in Greek and English.
- iv. Copies of all BNWAS type approval certificates, as well as of all support systems which have been installed along with it. It should be pointed out that all cables must be of the marine type, while any interfaces that may be installed shall be certified for electromagnetic compatibility (e.g. IEC60945 certification or as per Directive 2004/108/EC).

- v. A certificate by the installation technician attesting that a demonstration for the ship's officers or personnel of the managing company has been performed, duly stamped by the ship's Master or representative of the managing company.
- vi. In the event that the system cannot be connected with the ship's automatic pilot, a certificate by the installation technician stating the reasons which rendered such connection unfeasible. In such a case, the provisions of paragraph 5(i) hereof shall apply.

A copy of the above-mentioned dossier shall be kept on board. It is noted that the system's installation may be carried out by the ship's crew members or the managing company's technicians, provided that there is a related attestation by the manufacturer.

7. New and existing BNWAS

On ships not required to have accommodation areas for the crew, the alarm stages are adapted accordingly so as to enable the crew to be alerted through the activation of the BNWAS alarms, at the locations where crew members remain throughout the voyage. These locations may be the ship's canteen or the crew's area of stay, and therefore, the 2nd and 3rd stage shall sound together.

Connection of the BNWAS to the VDR device is mandatory only for VDR devices which will be installed after July 1, 2014, as required by the IMO Resolution MSC.333(90).

BNWAS equipment to be installed after October 5, 2014 aboard ships not required to comply with the provisions of Directive 96/98/EC (Wheel Mark, Presidential Decree No.347/1998, Off. Gov. Gazette 231A) as amended and in force at present, shall be duly certified according to the requirements of the above-mentioned Directive, provided that this equipment is included in Annex A.1 thereof as of October 5, 2012. Equipment which has been manufactured up until October 5, 2012 may be installed aboard ships until October 5, 2014 without the certification set out in the above Directive, provided that such equipment is certified according to IMO Resolution MSC.128(75).

Motion sensors which are activated with the user's involuntary movements in the bridge area are not acceptable and are not installed on board.

8. Update of Safety Certificate

In the event that the BNWAS has not been inspected by the ship's statutory certification body, the related Passenger Ship Safety Certificate or Cargo Ship Equipment Safety Certificate, or the ship's General Inspection Protocol, shall not be issued/renewed.

9. Updates – Failures/Malfunctions

The ship's Master is responsible for ensuring that the system is at all times in operation and its software duly updated. In the event of the system's failure/malfunction, the competent statutory certification body shall be informed immediately. Provided that the failure/malfunction cannot be instantly repaired in the port where the ship has called, the above-mentioned body may allow for a time-limit until the next port of call where the relevant repair work can be performed. In this case, additional measures shall be taken during watchkeeping as an alternative method to establish alertness of the bridge watchkeeping officer (for instance, by making entries in the form of the ISM Code kept on board or the ship's log, at intervals specified by the Master).

10. Port Authorities to which Safety Certificates or General Inspection Protocols are submitted, issued by our Service or another Port Authority and contain remarks in respect of the BNWAS installation on board, may upon request of the Master or ship manager, take corrective action in connection with such remarks, provided that the time-limits set precede those displayed in the above table.

11. The Associations to which the present document is addressed are requested to bring the information contained herein to the attention of their members.

12. Organizations issuing statutory certificates to ships required to comply with the aforementioned requirements, should verify ship compliance with them and advise accordingly their surveyors.

13. Port Authorities should include the present Circular Letter under Cons. No. 80 in Table 7 of Permanent Circular Letters of our Service, which has been communicated by our Order No.4115/01/2003/16.01.2003, and also monitor its implementation. The present Circular supersedes Circular Letter No. 4339.20/02/12/17.02.2012 issued under Cons. No.79 by the Branch for the Inspection of Merchant Ships (KEEP/DEP/DMK-DEP/ENESPY).