

# MED Compliance with IMO Resolution MSC.471(101)

September 2021

## Position summary

---

EU Notified Bodies should be able to issue MED approvals for EPIRB and VDR equipment that list the 2021 versions of the associated testing standards, which incorporate the Performance Standards of IMO Resolution MSC.471(101) (entering into force on 1<sup>st</sup> July 2022), but which are not listed in the current MED Implementing Regulation of 22<sup>nd</sup> June 2021.

Market Surveillance Authorities, Port State Control inspectors and vetting inspectors should consider accepting certificates listing the revised standards as this demonstrates compliance with IMO Resolution MSC.471(101).

## Background

---

At MSC 101 (June 2019) IMO revised its EPIRB Performance Standards to introduce more recent technology with the aim of further improving the capability of these devices to assist in distress alerting and locating. The revised EPIRB Performance Standards were published as Resolution **MSC.471(101)**, which has an in-force date of 1 July 2022.

Updated IEC testing standards for VDR (**IEC 61996-1:2013+AMD1:2021**) and EPIRB (**IEC 61097-2:2021**) were consequently published in May and June 2021, to incorporate the Performance Standards of IMO Resolution MSC.471(101),

The 5<sup>th</sup> Implementing Regulation (IR) of the MED ((EU) 2021/1158), which enters into force on 25 August 2021, will not list these latest versions of the IEC testing standards. This causes an issue for manufacturers trying to comply with IMO Resolution MSC.471(101) and provide EPIRBs for installation on EU flagged SOLAS vessels from July 2022, as equipment compliant with these versions of the testing standards cannot be MED-certified until the standards are listed in an IR.

## Discussion

---

A fundamental requirement of the Marine Equipment Directive is that marine equipment that is placed on board an EU ship shall meet the design, construction, and performance requirements of the international instruments applicable at the time when that equipment is placed on board. Therefore, performance requirements such as IMO Resolution MSC.471(101) apply automatically, regardless of whether they are listed in column 2 of the MED Implementing Regulations.

IMO Resolution MSC.471(101) includes the addition of an integral GNSS receiver, an AIS locating transmitter, a light visible to night vision devices and makes provision for Cospas-Sarsat Second Generation 406 MHz beacons. At the same time the transmitting duty cycle of the 121.5 MHz homing

signal was reduced to accommodate these additional features. These changes are intended to improve the accuracy of the position provided in the distress alerting signal and to enable additional assets at sea to more readily assist in search and rescue efforts. The overall goal being to find persons in distress sooner and thus help to save more lives.

IEC 61097-2:2021 and IEC 61996-1:2013+AMD1:2021 both test for the requirements of IMO Resolution MSC.471(101), so equipment designed to make use of these additional features with the reduced 121.5 MHz duty cycle will be compliant with these versions of the testing standards, but not the previous versions of the testing standards, which test for compliance with IMO Resolution A.810(19).

Only the testing standards listed in column 3 of the MED Implementing Regulations apply to the equipment concerned; revised versions of these standards do not apply automatically. It is anticipated that IEC 61097-2:2021 and IEC 61996-1:2013+AMD1:2021 will be listed in the 6th IR, which is expected to be in force in September 2022, but an interim measure is needed to cover the period between the in-force date of MSC.471(101) and that of an IR that lists IEC 61097-2:2021 and IEC 61996-1:2013+AMD1:2021.

## CIRM position on MED Compliance with IMO Resolution MSC.471(101)

---

CIRM holds the following positions:

- CIRM has proposed a draft MarED Recommendation which advises that a Notified Body can issue MED certification/approval listing the latest versions of the relevant testing standards for EPIRB and VDR equipment, with a comment on the certificate explaining that this is in order to ensure compliance with IMO Resolution MSC.471(101). Such a Recommendation should be approved in time to be applied in the period between 1 July 2022 and the in-force date of a MED IR that lists IEC 61097-2:2021 and IEC 61996-1:2013+AMD1:2021.
- Market Surveillance Authorities, Port State Control inspectors and vetting inspectors need to be aware of this issue, and in the event that a MarED Recommendation is not approved in time, are asked to consider accepting certificates listing the revised standards as this demonstrates compliance with IMO Resolution MSC.471(101).

