



IMO MSC 107 Meeting Summary

June 26, 2023

The 107th session of the IMO's Maritime Safety Committee (MSC 107) was held 31 May – 9 June 2023 at the IMO Headquarters in London. The meeting was supplemented by hybrid (online) arrangements.

Among others, Liberia participated in the following groups in addition to the plenary.

Group	Subject
WG 1	Working Group on Development of a goal-based instrument for MASS
WG 2	Working Group on Fuel Safety
DG 1	Drafting Group on Amendments to Mandatory Instruments (Chairperson of the group)

Decisions of other bodies

Missile launches

A Group of Member States proposed the draft MSC resolution to show their firm determination to object to any action which threatens maritime safety.

Subsequently, MSC 107 adopted resolution MSC.531(107) on *Strengthening measures for ensuring the safety of international shipping*.

Adoption of mandatory instruments

Mandatory instruments

The following instruments were adopted, and the entry into force date is indicated in brackets ().

SOLAS (1 January 2026)

MSC 107 adopted amendments to Chapters II-1, II-2, V, XIV and the appendix (Certificates) of the International Convention for the Safety of Life at Sea (SOLAS) 1974 (Resolution MSC.532(107)) and 1978 Protocol (MSC.533(107)) and 1988 Protocol (MSC.534(107)) consist of elements of;

- Onboard Lifting Appliance and Anchor Handling Winches (Chapter II-1);
- Perfluorooctane sulfonic acid (PFOS) ban (Chapter II-2);
- Electronic inclinometer for container ships and bulk carriers (Chapter V);

- Polar code application (extension to non-SOLAS ships, i.e., fishing vessels of 24 meters in overall length and above, pleasure yachts of 300 gross tonnage and above not engaged in trade and cargo ships of 300 gross tonnage and above but below 500 gross tonnage) on navigation and voyage planning (Chapter XIV)); and
- Certificates (on types of Immersion suits and electronic inclinometer).

STCW (1 January 2025)

Amendments were to introduce electronic certificates. See also relevant guidelines given as an MSC Circular.

- Regulations I/1 and I/2 of the STCW Convention on the introduction of electronic STCW certificates (MSC.540(107)); and
- Section A-I/2 of the STCW Code on the electronic STCW certificates (MSC.541(107)).

LSA Code (1 January 2026)

The amendments (MSC.535(107)) introduce ventilation requirements for the totally enclosed lifeboat. While the legal entry into force is on 1 January 2026, the requirements will apply to total enclosed lifeboats installed on or after 1 January 2029.

HSC codes (1 January 2026)

The following were introduced:

- The 1994 HSC Code on the PFOS ban and certificate on types of immersion suits (1 January 2026) (MSC.536(107)); and
- The 2000 HSC Code on the PFOS ban and certificate on

types of immersion suits (1 January 2026) (MSC.537(107)).

Polar Code (1 January 2026)

The amendments (MSC.538(107)) expand the application of Chapters 9 (Navigation) and 11 (Voyage planning) to non-SOLAS ships (1 January 2026). See also amendments to SOLAS Chapter XIV.

IMSBC Code (1 January 2025) (MSC.539(107))

While this is a comprehensive revision, primary changes are on:

- Dynamic separation;
- Cargo density declaration;
- Schedules (Celestine concentrate, crushed granodiorite fines (limit the cargo up to 22mm), fish meal (replace the existing individual schedule for "FISH MEAL (FISH SCRAP), STABILIZED UN 2216 Antioxidant treated" with the new individual schedule for "FISH MEAL (FISH SCRAP), STABILIZED Antioxidant treated"), ground granulated blast furnace slag powder, Magnesite fines; and superphosphate (to re-insert as this was removed by the previous amendments by an error)).

The amendments may be implemented from 1 January 2024 on a voluntary basis, pending mandatory enforcement on 1 January 2025.

Associated non-mandatory instruments

The following relevant non-mandatory resolutions and circulars were adopted/approved:

- MSC.542(107) on amendments to the Code of Safety for Special Purpose Ships, 1983 (1983 SPS Code) (on certificate form on types of immersion suits);
- MSC.543(107) on amendments to the Code of Safety for Special Purpose Ships, 2008 (2008 SPS Code) (on certificate form on types of immersion suits);
- MSC.544(107) on amendments to the *Revised recommendation on testing of life-saving appliances* (resolution MSC.81(70)) on ventilation of totally enclosed lifeboats;
- MSC.1/1662 on *Guidelines for anchor handling winches*;
- MSC.1/1663 on *Guidelines for lifting appliances*;
- MSC.1/1664 on *Revised form for cargo information for solid bulk cargoes*;
- MSC.1/Circ.1453/Rev.2 on *Guidelines for the submission of information and completion of the format for the properties of cargoes not listed in the IMSBC Code and their conditions of carriage*;
- MSC.1/Circ.1454/Rev.2 on *Guidelines for developing and approving procedures for sampling, testing and*

controlling the moisture content for solid bulk cargoes which may liquefy or undergo dynamic separation;

- MSC.1/Circ.1395/Rev.6 on *Lists of solid bulk cargoes for which a fixed gas fire-extinguishing system may be exempted or for which a fixed gas fire-extinguishing system is ineffective*;
- MSC.1/1665 on *Guidelines on the use of electronic certificates of seafarers*;
- MSC.1/Circ.1630/Rev.2 on *Revised standardized life-saving appliance evaluation and test report forms (survival craft)*; and
- MSC.1/Circ.1628/Rev.1 on *Revised standardized life-saving appliance evaluation and test report forms (personal life-saving appliances)*.

Maritime Autonomous Surface Ships (MASS)

Further work on the draft MASS Code

General

The current goal-based MASS Code has the following structure:

- Part 1 General;
- Part 2 Main Principles; and
- Part 3 Goal, Functional requirements and provisions.

MSC 107 made significant progress on Part 1 and Part 2.

Application

MSC 107 deferred the consideration of the application to the High-Speed Craft to MSC 108. As of MSC 107, no application was considered for passenger ships/craft.

Relationship with the SOLAS Convention

While MSC 107 noted that the entire SOLAS could not be applicable to MASS, yet, it agreed that MASS Code would be complementary to the SOLAS. Practically, this means that MASS has to comply with SOLAS but may be given equivalency based on the MASS code.

Search and rescue

The need was highlighted to incorporate provisions that require MASS to render assistance to persons in distress at sea in an expeditious manner.

Risk assessment methodologies

MSC 107 developed generic guidance without specifying a particular methodology to allow flexibility. The Working Group agreed that the structure and procedures for performing the risk assessment should follow the MSC.1/Circ.1455 on *Guidelines for the approval of alternatives and equivalents as provided for in various IMO instruments*.

STCW Convention

MSC 107 agreed that the HTW Sub-Committee would eventually have to develop competencies relating to MASS operations but that, at the present time, it was premature to consider the matter, given the early stage of the MASS Code development.

COLREG 1972

MSC 107 agreed there was no need to amend COLREG as it could be applied in full to any MASS.

The work of the Second Joint MSC-LEG-FAL Working Group (MASS-JWG 2)

MSC 107 concurred on, among others, the following points in principle:

- there should be a human master responsible for a MASS, regardless of the mode of operation or degree/level of autonomy;
- the term "Remote Operations Centre" (ROC) and its definition
- continue to use the acronym MASS as "Maritime Autonomous Surface Ships", and its current definition

Flag State oversight for an ROC

MSC 107 agreed that using the oversight of ISM companies as a model for considering an oversight mechanism of ROC located outside of the jurisdiction of the flag Administration was within the remit of MSC. However, MSC 107 could not work on a concrete solution due to a lack of a base proposal.

In this regard, Liberia stated that it would submit a base proposal to the MSC MASS Intersessional Working Group and invited Members to contact Liberia.

Fuel safety

Fuel sampling

MSC 107 developed the Draft joint MSC-MEPC circular to establish a single sampling regime under both the SOLAS and MARPOL Conventions, and to limit the scope of such a regime to oil fuels only, subject to concurrent decision by MEPC.

The key points of the draft circular are:

- This draft circular is intended to replace MEPC.182(59) on *2009 guidelines for the sampling of fuel oil for determination of compliance with the revised MARPOL ANNEX VI*.
- Whether to use the term "fuel oil" (used in MARPOL) or "oil fuel" (used in SOLAS) in this circular is undecided:

- Caution is given for cleaning the sample container with solvent. However, this does not mean the sample container can be reused.
- Minimum sample size is increased to 600ml from the current sample size of 400ml to analyze both sulphur contents and the flashpoint.
- Clarifies that the retention of the sample is the responsibility of the ISM company.

Fuel parameters other than the flashpoint

MSC 107 noted the following in addressing possible measures related to oil fuel parameters other than the flashpoint:

- Material Safety Data Sheets (MSDS) may not be the right tool to ensure the safety of the delivered batch of the fuel:
- Referring to ISO 8217:2017 in SOLAS provisions would, in essence, make compliance with the ISO standard mandatory, which may lead to an increased number of debunkering; and
- the detailed information on unusual components mentioned in resolution MEPC.320(74) on *2019 Guidelines for consistent implementation of the 0.50% sulphur limit under MARPOL ANNEX VI* should be taken into account.

Following the discussion, MSC 107 developed a generic SOLAS regulation II-2/4.2.1.9 that oil fuel should not jeopardize the ship's safety, similar to MARPOL Annex VI, regulation 18.3.1.1.3, for adoption by MSC 108, as follows:

Oil fuel delivered to and used on board ships shall not jeopardize the safety of ships or adversely affect the performance of the machinery or be harmful to personnel.

Flashpoint documentation

MSC 107 agreed on the following understanding of the flashpoint in relation to the revised SOLAS regulation II-2/4.2.1.6 (MSC.520(106)) subject to entry into force of the amendments and concurrence by MEPC:

The test method will provide a specified temperature when an ignition source produces a "flash" in the sample. If this flash occurs when the sample has been heated to a temperature below 70°C, this temperature should be reported on the bunker delivery note. If, however, the sample is heated to 70°C and then tested without producing a flash, there will not be an actual measured flashpoint temperature to report, but this is sufficient to establish that the flashpoint is above the 60°C minimum and thus allow for a statement to be made that the flashpoint has been measured at or above 70°C. If heating and testing of the sample has been

carried out beyond 70°C and produced a flash, there will be a specific temperature that can be reported.

Maritime security

Piracy

MSC 107 reviewed the update on developments related to piracy and armed robbery against ships.

According to information received and made available in IMO's GISIS module, 131 incidents of piracy and armed robbery against ships were reported to the IMO as having occurred or been attempted in 2022. In 2021, 172 incidents were reported. This, therefore, constitutes a decrease of approximately 24% at the global level compared to the same period in 2021.

From the data referred to above, it also emerges that the areas most affected by acts of piracy and armed robbery against ships in 2022 were the Straits of Malacca and Singapore (72), West Africa (21) and South America (Pacific) (14), followed by Indian Ocean (9), South America (Atlantic) (6), South America (Caribbean) (4), South China Sea (4) and Arabian Sea (1). The number of incidents that took place in the Gulf of Guinea (West Africa) decreased in 2022 by 17 compared to the same period in 2021, when 38 incidents were reported. This constitutes a decrease of 45%.

With regard to the situation in the Gulf of Guinea, some Members expressed concerns over the recent incidents while appreciating the efforts being made by the authorities involved.

Unsafe mixed migration by sea

MSC 107 recalled that MSC 106 had adopted resolution MSC.528(106) on *Recommended cooperation to ensure the safety of life at sea, the rescue of persons in distress at sea and the safe disembarkation of survivors*.

Non-survivor

Liberia, following the discussions at MSC 106 and resolution MSC.528(106), submitted a paper to address deceased found in migrant boats or those who deceased after the recovery.

MSC 107 agreed with the proposal to develop guidance for handling cases of deceased, either as an amendment to resolution MSC.528(106) or as a separate set of guidelines, and invited Member States and international organizations to submit relevant proposals to MSC 108 under this agenda item.

Outcome of CCC 8

The Sub-Committee on Carriage of Cargoes and Containers held its eighth session (CCC 8) from 14 to 23 September 2022. Among others, MSC 107:

- approved MSC.1/1666 on *Interim guidelines for the safety of ships using LPG fuels*;
- approved the draft amendments to the IGF Code on bunkering manifold and operation, fuel tank pressure relief valves, redundancy of the propulsion capability, ventilation of segments of upstream of gas consumers, clarification of design pressure of piping systems, requirements for portable dry powder extinguisher in the fuel preparation room and clarification of hazardous areas for adoption by MSC 108;
- approved unified interpretations of the IGF Code on the fuel preparation rooms not located on an open deck (MSC.1/Circ.1667) and flange connection (MSC.1/Circ.1670);
- approved the draft amendments to the Grain Code on especially "suitable compartment" for partial filling for adoption by MSC 108;
- endorsed CCC.1/Circ.5 on Carriage Condition for VOC Condensate;
- approved the draft Unified Interpretations of the IGC Code on LNG bunkering ships (MSC.1/Circ.1668) and the first loading (MSC.1/Circ.1669); and
- approved the draft amendments to the SOLAS Chapter V on the reporting of lost containers for adoption by MSC 108.

Outcome of SDC 9

The ninth session of the Sub-Committee on Ship Design and Construction (SDC 9) was held 23-27 January 2023. Among others, MSC 107:

- approved draft amendments to the ESP Code on thickness measurement company for adoption by MSC 108;
- adopted amendments to 1979, 1989 and 2009 MODU Codes to prohibit materials which contain asbestos by resolutions MSC 545(107), MSC 546(107) and MSC 547(107), respectively, which will be effective from 1 January 2024;
- approved MSC.1/Circ.1671 on Unified interpretation on implementation of regulation 2.10.3 of the 2009 MODU Code, regulation 2.8.2 of the 1989 MODU Code;
- approved MSC.1/Circ.1672 on *Guidelines for*

maintenance and monitoring of materials containing asbestos on board MODUs;

- approved the draft amendments to SOLAS regulation II-1/3-4 expanding emergency towing arrangements from tankers to ships other than tankers for adoption by MSC 108;
- approved MSC.1/Circ.1673 on the unified interpretation of SOLAS regulation II-1/1.1.3 on multiple-hold cargo ships other than bulk carriers and tankers constructed on or after 1 January 2024;
- approved MSC.1/Circ.1537/Rev.2 on unified interpretations of the 2008 IS Code on down-flooding point;
- approved and MSC.1/Circ.1362/Rev.2 on the interpretation of SOLAS regulation II-1/3-8 for clarifying the documentation which is necessary to support an Administration or its Recognized Organizations in verifying compliance with SOLAS regulation II-1/3-8 (Towing and mooring equipment), and the interpretation of SOLAS regulation II-1/13.2.3 for clarifying that heat-sensitive piping systems penetrating a watertight bulkhead or deck on a passenger ship; and
- adopted resolution MSC.188(79)/Rev.2 on *Revised performance standards for water level detectors on ships subject to SOLAS regulations II-1/25, II-1/25-1 AND XII/12.*

Outcome of HTW 9

The ninth session of the Sub-Committee on Human Element, Training and Watchkeeping (HTW 9) was held 6-10 February 2023. Among others, MSC 107 approved the draft amendments to table A-VI/1-4 of the STCW Code to prevent and respond to bullying and harassment, including sexual assault and sexual harassment (SASH) for adoption by MSC 108.

Outcome of SSE 9

The ninth session of the Sub-Committee on Ship Systems and Equipment (SSE 9) was held 27 February - 3 March 2023. Among others, MSC 107:

- approved the draft amendments to resolution MSC.402(96) on *Requirements for maintenance, thorough examination, operational testing, overhaul and repair of lifeboats and rescue boats, launching appliances and release gear* regarding ventilation requirements for totally enclosed lifeboats for adoption by MSC 108;
- approved the draft amendments to the LSA code concerning single hook systems, maximum lowering

speed (1.3m/s) and in-water performance of lifejackets for adoption by MSC 108;

- Approved MSC.1/Circ.1674 on the unified interpretation of the LSA Code, the 1994 and 2000 HSC Codes on the spare bulbs needed for LED torches;
- approved draft amendments to SOLAS Chapter II-2 concerning Fire Safety for ro-ro passenger ships in relation to side openings, fire detection and alarms, protection of vehicles carried on the weather deck, and fire detection within control stations and cargo control rooms for adoption by MSC 108;
- approved draft amendments to the FSS Code concerning ro-ro passenger ship fire safety for adoption by MSC 108;
- approved MSC.1/Circ.1430/Rev.3 on *Revised guidelines for the design and approval of fixed water-based fire-fighting systems for ro-ro spaces and special category spaces* concerning the use of the term "free height";
- approved MSC.1/Circ.1456/Rev.1 on *unified interpretations of SOLAS chapter II-2 and the FSS and FTP Codes* on control station, including cargo control rooms;
- adopted the revision to the diving safety code as 2023 *Diving Systems Code* by resolution MSC.548(107);
- approved MSC.1/Circ.1276/Rev.1 on Unified Interpretation on galley ducts;
- approved MSC.1/Circ.1557/Rev.1 on *Revised hazardous area classification (application of SOLAS regulation II-1/45.11)*; and
- approved MSC.1/Circ.1675 on *Interim guidelines on safe operation of onshore power supply (OPS) service in port for ships engaged on international voyages.*

Outcome of NCSR 10

The tenth session of the Sub-Committee on Navigation, Communications and Search and Rescue (NCSR 10) was held 10-19 May 2023. Due to the close proximity of the meeting, only urgent matters will be addressed by MSC 107, which were, among others:

- approved MSC.1/Circ.1613/Rev.2 on *Iridium SafetyCast service manual*;
- endorsed the approval of COMSAR.1/Circ.32/Rev.2 on *Harmonization of GMDSS requirements for radio installations on board SOLAS ships*;
- approved MSC.1/Circ.1676 on *Delays affecting the availability of new GMDSS equipment compliant with the revised performance standards set out in resolutions MSC.511(105), MSC.512(105) and MSC.513(105)*. The circular grants extension for

meeting the new performance standards for VHF Radio, MF and MF/HF Radio and DSC, and Inmarsat C Ship Earth Stations until 1 January 2028.

- approved MSC.1/Circ.1460/Rev.4 on *Guidance on the validity of radiocommunications equipment installed and used on ships*. This circular allows continued use of the existing VHF radio frequencies until 1 January 2028.
- in relation to the possible discontinuation of paper chart production, it concurred that mariners should have the option to receive paper charts.

Any other business

Impact of the COVID-19

Following the suggestion of the IMO Secretariat, MSC 107 approved the draft Assembly resolution on *Recommendations emanating from the Joint Action Group to review the impact of the COVID-19 pandemic on the world's transport workers and the global supply chain*.

FURTHER INFORMATION

For further information please contact: imo@liscr.com

MSC 107 – Summary of Major Decisions

PROVISIONAL LIST OF RESOLUTIONS AND CIRCULARS

ID	Title
MSC.531(107)	Strengthening measures for ensuring the safety of international shipping
MSC.532(107)	Amendments to the International Convention for the Safety of Life at Sea, 1974
MSC.533(107)	Amendments to the Protocol of 1978 Relating to the International Convention for the Safety of Life at Sea, 1974
MSC.534(107)	Amendments to the Protocol of 1988 Relating to the International Convention for the Safety of Life at Sea, 1974
MSC.535(107)	Amendments to the International Life-Saving Appliance Code (LSA Code)
MSC.536(107)	Amendments to the International Code of Safety for High-Speed Craft, 1994 (1994 HSC Code)
MSC.537(107)	Amendments to the International Code of Safety for High-Speed Craft, 2000 (2000 HSC Code)
MSC.538(107)	Amendments to the International Code for Ships Operating in Polar Waters (Polar Code)
MSC.539(107)	Amendments to the International Maritime Solid Bulk Cargoes (IMSBC) Code
MSC.540(107)	Amendments to the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW), 1978
MSC.541(107)	Amendments to Part A of The Seafarers' Training, Certification, and Watchkeeping (STCW) Code
MSC.542(107)	Amendments to the Code of Safety for Special Purpose Ships, 1983 (1983 SPS Code)
MSC.543(107)	Amendments to the Code of Safety for Special Purpose Ships, 2008 (2008 SPS Code)
MSC.544(107)	Amendments to the Revised Recommendation on Testing of Life-Saving Appliances (Resolution Msc.81(70))
MSC.545(107)	Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 1979 (1979 MODU Code)
MSC.546(107)	Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 1989 (1989 MODU Code)
MSC.547(107)	Amendments to the Code for the Construction and Equipment of Mobile Offshore Drilling Units, 2009 (2009 MODU Code)
MSC.188(79)/Rev.2	Revised Performance Standards for Water Level Detectors on Ships Subject to SOLAS Regulations II-1/25, II-1/25-1 AND XII/12
MSC.548(107)	International Code of Safety for Diving Operations, 2023 (2023 Diving Code)
MSC.1/Circ.1662	Guidelines for anchor handling winches
MSC.1/Circ.1663	Guidelines for lifting appliances
MSC.1/Circ.1664	Revised form for cargo information for solid bulk cargoes
MSC.1/Circ.1453/Rev.2	Guidelines for the submission of information and completion of the format for the properties of cargoes not listed in the International Maritime Solid Bulk Cargoes (IMSBC) Code and their conditions of carriage
MSC.1/Circ.1454/Rev.2	Guidelines for developing and approving procedures for sampling, testing and controlling the moisture content for solid bulk cargoes which may liquefy or undergo dynamic separation
MSC.1/Circ.1395/Rev.6	Lists of solid bulk cargoes for which a fixed gas fire-extinguishing system may be exempted or for which a fixed gas fire-extinguishing system is ineffective
MSC.1/Circ.1665	Guidelines on the use of electronic certificates of seafarers
MSC.1/Circ.1630/Rev.2	Revised standardized life-saving appliance evaluation and test report forms (survival craft)
MSC.1/Circ.1628/Rev.1	Revised standardized life-saving appliance evaluation and test report forms (personal life-saving appliances)
MSC.1/Circ.1666	Interim guidelines for the safety of ships using LPG fuels

MSC.1/Circ.1667	Unified interpretation of requirements in the IGF Code for fuel preparation rooms not located on an open deck
MSC.1/Circ.1668	Unified interpretation of bunkering manifold arrangements fitted on LNG bunkering ships in the IGC Code
MSC.1/Circ.1669	Unified interpretation of the IGC Code on the first loading;
MSC.1/Circ.1670	Unified interpretation of the IGF Code on piping systems for fuel supply to consumers
MSC.1/Circ.1671	Unified interpretation on implementation of regulation 2.10.3 of the 2009 MODU Code, regulation 2.8.2 of the 1989 MODU Code and regulation 2.7.2 of the 1979 MODU Code (on asbestos)
MSC.1/Circ.1672	Guidelines for maintenance and monitoring of materials containing asbestos on board MODUs
MSC.1/Circ.1673	Unified interpretation of SOLAS regulation II-1/1.1.3
MSC.1/Circ.1537/Rev.2	Unified interpretations of the 2008 IS Code (down-flooding point)
MSC.1/Circ.1362/Rev.2	Unified interpretation of SOLAS chapter II-1 (interpretation of SOLAS regulation II-1/3-8 on mooring and towing arrangements, clarifying the documentation which is necessary to support an Administration or RO)
MSC.1/Circ.1164/Rev.27	Promulgation of information related to reports of independent evaluation submitted by Parties to the 1978 STCW Convention confirmed by the Maritime Safety Committee to have communicated information which demonstrates that Parties are giving full and complete effect to the relevant provisions of the Convention
MSC.1/Circ.797/Rev.39	List of competent persons maintained by the Secretary-General pursuant to section A-I/7 of the Seafarers' Training, Certification and Watchkeeping (STCW) Code
MSC.1/Circ.1430/Rev.3	Revised guidelines for the design and approval of fixed water-based fire-fighting systems for ro-ro spaces and special category spaces
MSC.1/Circ.1674	Unified interpretations of the LSA Code, the 1994 and 2000 HSC Codes on use of LED torches
MSC.1/Circ.1276/Rev.1	Revised unified interpretations of SOLAS chapter II-2 on separation of galley ducts
MSC.1/Circ.1557/Rev.1	Revised hazardous area classification (application of SOLAS regulation II-1/45.11)
MSC.1/Circ.1675	Interim guidelines on safe operation of onshore power supply (OPS) service in port for ships engaged on international voyages
MSC.1/Circ.1613/Rev.2	Iridium SafetyCast service manual
MSC.1/Circ.1676	Delays affecting the availability of new GMDSS equipment compliant with the revised performance standards set out in resolutions MSC.511(105), MSC.512(105) and MSC.513(105)
MSC.1/Circ.1460/Rev.4	Guidance on the validity of radiocommunications equipment installed and used on ships