



TECHNICAL CIRCULAR No. 671 of 7th February 2021

To	All Surveyors/Auditors. All flags
Title	SHIP CERTIFICATES DUE TO COVID-19
Reference	(IMO) Circular MSCMEPC.5/Circ.1

THE VALIDITY OF SHIP CERTIFICATES DUE TO COVID-19

Since the release of MSA No. 14-20, the COVID-19 pandemic continues to evolve. The situation varies depending upon location and is subject to change over time. Therefore, to address all situations where a ship is experiencing difficulty in completing surveys, CONARINA requires the principles in International Maritime Organization (IMO) Circular MSCMEPC.5/Circ.1 and IMO Circular Letter No. 4204/Add.19, to be applied when extensions are requested.

Where the CONARINA considers that there is a reasonable case for force majeure due to COVID-19, CONARINA will consider an application to extend survey windows and allow a ship to continue trading.

A reasonable case for force majeure due to COVID-19 may include the ship being quarantined, or if there are travel or quarantine restrictions preventing the necessary surveyor(s), essential superintendents, technicians, or service teams attending, and the limitation of any specialized equipment, facility, or essential spares being delivered to the ship.

In all cases the RO must maintain a record of ships receiving extensions to surveys, or certificates, and ensure a list of affected ships is available upon a request from the Administrator.

With regards to surveyor attendance to witness rectification of statutory deficiencies of a minor nature, the CONARINA has no objection to an alternative evidence-based proposal.

The guidance below outlines a practical approach to compliance during this pandemic and its aftermath and when the extensions, previously granted, become due adding to the current demands.

Certificates

1 Guidance are provided on maintaining validity of statutory certificates issued under the following Conventions:

- International Convention for the Safety of Life at Sea (SOLAS)
- International Convention for the Prevention of Pollution from Ships (MARPOL)
- International Convention on Load Lines, 1966, as Amended by the Protocol of 1988 (Load Line)
- International Convention for the Control and Management of Ships' Ballast Water and Sediments, 2004 (BWMC)

2 Also, guidance applies on certificates issued in accordance with the International Safety Management Code, the International Ship and Port Facility Security Code, and the Maritime Labour Convention, 2006.

3. Extending the period between surveys and validity of certificates for up to three Months.

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When a ship is not in a port where it can be surveyed, IMO Circular MSC-MEPC.5/Circ.1 may be applied. At the first opportunity according to the ship's voyage itinerary, it should be attended by a surveyor for the purpose of either completing the survey or performing an extension survey. When physical attendance is not possible or feasible, the CONARINA may accept alternative arrangements such as a remote survey with live video.

4. Extending the period between surveys and the validity of certificates by more than three months.

When a survey cannot be completed within an initial three-month extension then, the six steps as part of the guiding principles for considering a statutory certificate extension beyond three months outlined in the Annex of IMO Circular Letter No. 4204/Add.19 may be followed.

4.1 Extensions to surveys beyond three months should only be considered when any expiring conditions of Class or Statutory Authority can be satisfactorily assessed and extended. Such extensions must not be granted to ships with substandard conditions onboard.

4.2 Alternative compliance methods can be considered provided there is supporting evidence that the intent of the Survey Guidelines under the Harmonized System of Survey and certification (HSSC) (IMO Assembly Resolution A.1140(31)) can be met. The survey should be progressed as far as practical, and any extension survey that took place during the initial three-month extension may be taken as contributory in effect.

4.3 For dry-docking extensions due to extreme extenuating circumstances, provided there is evidence suggesting best efforts have been made to secure dry-dock space, the CONARINA will consider extensions to intermediate and renewal dry-docking beyond three months.

All Class and statutory surveys must have been progressed as far as practicable while afloat, leaving only the minimum pending items to be checked in dry-dock. Where it is relevant to the age and type of ship, and safe to do so, the scope of the survey should also consider the enhanced survey program. Major deficiencies must be rectified. Class and short-term statutory certificates should be issued to reflect the pending items that remain to be tested and surveyed.

For the extension see: IMO Circular MSC-MEPC.5/Circ.1,

“the extension period of the relevant statutory certificate(s) should not exceed the period of validity of the certificate which may be issued to document compliance with the structural, mechanical and electrical requirements of the recognized classification society.”

REFERENCES:

- IMO Circular MSC-MEPC.5/Circ.1,
- ATTACHMENTS: No

Kindest Regards,

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