



# Technical Circular

No.: 097/2020

Date: 03<sup>rd</sup> July 2020

## Subject: St. Vincent and the Grenadines – Advice from the Maritime Administration on COVID-19 Pandemic

1. The Administration of St. Vincent and the Grenadines considers the COVID-19 outbreak to be a *force majeure* and vide attached Circular No. GEN 025-Rev.3, has provided following guidance to assist the the Shipowners/ Ship Operators/ Managers and Recognized Organizations;
  - a. **Scheduled Statutory Surveys:**
    - i. In cases where RO surveyors are not able to undertake scheduled surveys due to restrictions imposed by COVID-19, the Administration will consider applications for extension/postponement under force majeure **on a case-by-case basis**.
    - ii. Duly filled Application form as per GEN 001, signed, stamped and commented by RO is to be submitted to the Administration by the Shipowners/ Ship Operators/ Managers.
    - iii. Evidence of a plan covering how the ship will be brought back into the regular survey cycle is to be enclosed along with the application.
  - b. **Dry docking surveys and servicing of ship's equipment:**
    - i. Extension of a ship's dry docking survey or servicing of ship's equipment as required by IMO Conventions due to COVID-19 may be requested.
    - ii. The Shipowners/ Ship Operators/ Managers to use application form as per GEN 001 circular. The application form duly signed, stamped and commented by RO is to be submitted before the due date of the surveys or expiry date of the statutory certificate in order to avoid Port State Control issues.
    - iii. Evidence of ship's plan covering intended dry docking survey and servicing of ship's equipment is to be enclosed along with the application.
  - c. **ISM Internal Audit:**
    - i. The Administration will, at the ISM Manager's request, extend annual ISM internal audits for **up to three (3) months**, as per para 12.1 of the ISM Code in cases where audits cannot be carried out due to travel restrictions imposed due to COVID19.

- ii. Upon expiry of the initial extension, provided that the Company has necessary arrangements in place, an internal ISM audit may be carried out on board by the crew. The Master may audit the Engine Department and the Chief Engineer may audit the Deck Department, under remote supervision from qualified internal auditor/DPA from the Company.

**d. ISM Document of Compliance:**

- i. The Administration will, at the ISM Manager's request may extend annual, additional or renewal DoC audits up to **18 August 2020** in cases where audits cannot be carried out because of travel restrictions imposed due to COVID-19.
- ii. Remote auditing in relation to annual DOC audits is allowed subject to ISM Manager's and RO's agreement.
- iii. Extension of interim and initial audits will be dealt with on a case by case basis.

**e. Safety Management Certificates (SMC) and International Ship Security Certificates (ISSC):**

- i. With regards to SMC and ISSC renewal audits/ verifications, and noting the provisions of ISM Code 13.14 and ISPS Code A-19.3.5, the Administration may authorise its Recognised Organisations to issue **three (3) month extensions** to existing SMC and ISSC Certificates.
- ii. Duly filled Application form as per GEN 001 circular, signed, stamped and commented by RO is to be submitted by the ISM Manager.
- iii. With regards intermediate and additional audits/verification extension, the ISM Manager is to use application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO.
- iv. Extension of interim and initial audits/verifications will be dealt with by the Administration on a case by case basis.

**f. Maritime Labour Certificates (ML Certificates):**

- i. MLC 2006 does not allow extensions to existing MLC Certificates without an MLC inspection. However, due to COVID- 19 restrictions, the Administration may authorise its Recognised Organisations to administratively issue a ML Certificate **valid until 18 August 2020** where the renewal inspection cannot be conducted.
- ii. With regards to intermediate and additional inspection extension, the MLC Shipowner is to use the application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO.

- iii. Extension of interim and initial inspections will be dealt with on a case by case basis.

**g. Annual Flag State Inspections and Pre-registration inspections:**

- i. Due Annual Flag State Inspections will be carried out subject to availability of the Flag State Inspectors.
- ii. In case that Pre-registration inspection cannot take place due to COVID- 19 restrictions, an inspector of the Administration will attend the vessel at a mutually agreed location for an initial general inspection after the registration on a case-by-case basis.

**h. Seafarers Employment Agreements and repatriation:**

In cases where crew members may have to exceed the twelve (12) months or contractual period onboard as stated in their original Seafarers' Employment Agreement (SEA) because of travel restrictions imposed due to COVID- 19, the Administration will consider such extensions to be force majeure and therefore not a breach of the Maritime Labour Convention, 2006, as amended. A new SEA is to be signed by both parties with the clause that the seafarer is entitled to repatriation at no cost to the seafarer at seven (7) day notice.

**i. MLC Financial Security:**

MLC Shipowners to check urgently with their insurance providers that the insurance or other financial security cover seafarers for COVID-19 related issues. Coverage should be extended if necessary. This applies to both MLC Standard A2.5.2 and Standard A. 4.2.1.

**a. Extension of the validity of STCW Endorsements attesting the Recognition of Certificates of Competency or Certificates of Proficiency:**

Expired Endorsements attesting the Recognition of Certificates of Competency or Certificates of Proficiency may be extended if national Certificates of Competency or Certificates of Proficiency are extended as well.

**b. Minimum Safe Manning Dispensation:**

If a crew member needs to leave the ship due to urgent circumstances and cannot be replaced immediately due to COVID-19 travel restrictions, a dispensation can be requested from the Administration.

**c. Seamen's Book:**

Seamen's Book May be extended upon request to the Administration.

**d. Medical Certificates:**

Seafarers with a medical certificate about to expire or no longer valid will be allowed to keep serving on board for a **period of up to three (3) months**.

**e. Drills:**

In order to safeguard the health of the crew, but still maintaining compliance as much as possible, from a safety perspective the shipowners should take measures such as, but not limited to the following:

- i. Crew drills may be restricted to those mandatory drills required by SOLAS;
- ii. Crew drills may be conducted in a manner to maintain social distancing as much as possible;
- iii. Drills which require crew to be in close proximity may be conducted as table top exercises or instructional sessions, so that social distancing is maintained.

**f. Copies of certificates and other documents:**

In view of increasing difficulty in delivering original documents and certificates onboard due to the exceptional circumstance, the Administration allows temporarily for copies of certificates and other documents to be kept onboard instead of originals.

2. The temporary measures stated above shall remain in place for a **period of two (2) months starting from 18th June 2020** and are subject to review by the Administration as the situation develops. A copy of the Circular No. GEN 025-Rev.3 is to be kept onboard ready to be disclosed to PSC Officers.
3. Ship owners/ operators and masters of St. Vincent and the Grenadines flagged ships are advised to be guided by above.
4. **This Technical Circular supersedes and revokes earlier Technical Circular No. 084/2020, dated 26<sup>th</sup> May 2020.**

**Enclosure:**

St. Vincent and the Grenadines Marine Circular No. GEN 025-Rev.3, dated 30<sup>th</sup> June 2020.

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# ST. VINCENT AND THE GRENADINES

## MARITIME ADMINISTRATION

### CIRCULAR N° GEN 025 - Rev 3.

#### COVID-19 ADVICE FROM MARITIME ADMINISTRATION

**TO:** **SHIP OWNERS/SHIP OPERATORS/MANAGERS,  
MASTERS AND RECOGNIZED ORGANIZATIONS  
AND FLAG STATE INSPECTORS**

**APPLICABLE TO:** All ships

**EFFECTIVE AS FROM:** 18 June 2020

Date: 30<sup>th</sup> June 2020

The ongoing COVID-19 pandemic is resulting in various restrictions and limitations which seriously affect the continuity of maritime operations on a global scale.

Due to COVID-19 restrictions ability to travel, both nationally and internationally, has become increasingly difficult as travel bans have been imposed.

In order to assist the Shipowners/Ship Operators/Managers and Recognized Organizations (RO) as much as possible please note the following:

#### **Scheduled Statutory Surveys**

In cases where RO surveyors are not able to undertake scheduled surveys due to restrictions imposed by COVID-19, this Administration will consider applications for extension/postponement under force majeure on a case-by-case basis. The Shipowners/Ship Operators/Managers should use application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO. In addition, there must also be evidence that the ship has a plan that covers how she will be brought back into the regular survey cycle.

#### **Dry docking surveys and servicing of ship's equipment**

Extension of a ship's dry docking surveys or servicing of ship's equipment as required by IMO Conventions due to COVID-19 may be requested. The Shipowners/Ship Operators/Managers should use application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO. The applications should be submitted before the due date of the surveys or expiry date of the statutory certificate in order to avoid port State Control issues. In addition, there must also be evidence that the ship has a plan that covers intended dry docking surveys and servicing of ship's equipment.

#### **ISM internal audits**

This Administration will, at the ISM Manager's request, extend annual ISM internal audits for up to three (3) months, as per para 12.1 of the ISM Code in cases where audits cannot be carried out due to travel restrictions imposed due to COVID-19.

Upon expiry of the initial extension, provided that the Company has necessary arrangements in place, an internal ISM audit may be carried out on board by the crew. The Master may audit the Engine Department and the Chief Engineer may audit the Deck Department, under remote supervision from qualified internal auditor/DPA from the Company.

## **ISM Document of Compliance**

This Administration will, at the ISM Manager's request may extend annual, additional or renewal DoC audits up to **18 August 2020** in cases where audits cannot be carried out because of travel restrictions imposed due to COVID-19.

Remote auditing in relation to annual DOC audits is allowed subject to ISM Manager's and RO's agreement.

Extension of interim and initial audits shall be dealt with on a case by case basis.

## **Safety Management Certificates (SMC) and International Ship Security Certificates (ISSC)**

With regards to SMC and ISSC renewal audits/verification, and noting the provisions of ISM Code 13.14 and ISPS Code A-19.3.5, this Administration may authorise its Recognised Organisations to issue three (3) month extensions to existing SMC and ISSC Certificates.

The ISM Manager should use application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO.

With regards intermediate and additional audits/verification extension the ISM Manager should use application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO.

Extension of interim and initial audits/verifications shall be dealt with on a case by case basis.

## **Maritime Labour Certificats (ML Certificats)**

MLC 2006 does not allow extensions to existing MLC Certificates without an MLC inspection. Due to COVID- 19 restrictions this Administration may authorise its Recognised Organisations to administratively issue a ML Certificate until **18 August 2020** where the renewal inspection cannot be conducted.

With regards intermediate and additional inspection extension the MLC Shipowner should use the application form as per GEN 001 circular. The application form should be stamped, signed and commented by RO.

Extension of interim and initial inspections shall be dealt with on a case by case basis.

## **Annual Flag State Inspections and Pre-registration inspections**

Due Annual Flag State Inspections will be carried out subject to availability of the Flag State Inspectors.

In case that Pre-registration inspection cannot take place due to COVID-19 restrictions an Inspector of this Administration will attend the ship at a mutually agreed location, for an initial general inspection after the registration on a case-by-case basis.

## **Seafarers Employment Agreements and repatriation**

In cases where crew members may have to exceed the twelve (12) months or contractual period onboard as stated in their original Seafarers' Employment Agreement (SEA) because of travel restrictions imposed due to COVID- 19, this Administration will consider such extensions to be force majeure and therefore not a breach of the Maritime Labour Convention, 2006, as amended. A new SEA shall be signed by both parties with the clause that the seafarer is entitled to repatriation at no cost to the seafarer at seven (7) days notice.

## **MLC Financial Security**

MLC Shipowners should check urgently with their insurance providers that the insurance or other financial security cover seafarers for COVID-19 related issues. Coverage should be extended if necessary. This applies to both MLC Standard A2.5.2 and Standard A. 4.2.1.

## **Extension of the validity of STCW Endorsements attesting the Recognition of Certificates of Competency or Certificates of Proficiency**

Endorsements attesting the Recognition of Certificates of Competency or Certificates of Proficiency expire may be extended if national Certificates of Competency or Certificates of Proficiency are extended as well.

Applications should be submitted to this Administration including Certificates of Competency or Certificates of Proficiency endorsed with a new expiry date by the issuing Administration.

Some of the issuing authorities have issued circulars with general extension of Certificates of Competency or Certificates of Proficiency until certain dates. A copy of such circular may be forwarded as supporting documentation.

### **Minimum Safe Manning Dispensation**

If a crew member needs to leave the ship due to urgent circumstances and cannot be replaced immediately due to COVID-19 travel restrictions, a dispensation can be requested from this Administration. Copies of MSM Document along with the request in an open form should be forwarded in this respect.

**Seamen's Books** may be extended upon request to this Administration.

### **Medical Certificates**

Due to the exceptional circumstances this administration follows the Regulation I/9 of the STCW Convention as amended, and Regulation 1.2 of the MLC Convention 2006, as amended. Seafarers with a medical certificate about to expire or no longer valid will be allowed to keep serving on board for a period of up to three (3) months.

### **Drills**

In order to safeguard the health of the crew, but still maintain compliance as much as possible from a safety perspective the shipowners should take measures such as, but not limited to the following:

- Crew drills may be restricted to those mandatory drills required by SOLAS;
- Crew drills may be conducted in a manner to maintain social distancing as much as possible;
- Drills which require crew to be in close proximity may be conducted as table top exercises or instructional sessions, so that social distancing is maintained.

### **Copies of certificates and other documents**

This Administration has experienced increasing difficulty in delivering original documents and certificates onboard its registered ships. Therefore, in consideration of the exceptional circumstances, this Administration allows temporarily for copies of certificates and other documents to be kept onboard instead of originals.

These temporary measures shall remain in place for a period of **two (2) months** starting from **18 June 2020** and are subject to review as the situation develops.

This Circular should be kept on board ready to be disclosed to PSC Officers.

Revision history:

REV-2,

Revised titles: ISM internal audits, Safety Management Certificates (SMC) and International Ship Security Certificates (ISSC) and Maritime Labour Certificates (ML Certificates).

Added titles: Drills, Minimum Safe Manning Dispensation, Copies of Certificates and other documents, MLC Financial Security.

REV-3,

Revised titles: ISM Document of Compliance, Maritime Labour Certificates (ML Certificates), Copies of Certificates and other documents