



# Technical Circular

No.: 109/2020

Date: 28<sup>th</sup> August 2020

## **Subject: DGS, Order No. 23 of 2020 Reg Extension to the validity of Ship's Statutory Certificates, Periodical Surveys and Audits in view of COVID-19 pandemic**

1. Reference is made to Technical Circular No. 096/2020 based on DGS Order No. 17 of 2020 in respect of extension to the validity of Ship's Statutory Certificates, Periodical Surveys and Audits in view of COVID-19 pandemic.
2. Vide above DGS Order No. 17 of 2020, Administration had granted extension to the validity of statutory certificates to ships whose statutory surveys were expiring **after 30th June 2020 but on/prior to 31st August 2020.**
3. The Directorate, vide DGS Order No. 23 of 2020, has now decided to continue grant of extension of Statutory certificates to ships whose statutory surveys are expiring **between 1st September 2020 and 31st October 2020** under similar procedures as detailed in DGS Order 17 of 2020.
4. However, the waiver of applicable extension/ dispensation fees as applicable for surveys/ audits, etc falling due **after 31 August 2020** will **NOT** be applicable to ships to which the DGS Order No.23 of 2020 applies.
5. The procedure for extension to the validity of Statutory Certificates are as follows;

### **a. The Risk assessment by RO:**

A Risk Assessment will be carried out by RO taking into account past survey and inspection history, satisfactory continuation of past imposed Condition of Class / Statutory Condition, if any, **declaration by Master and CE** that they have carried out a satisfactory general examination and **a declaration by DPA/Owner/Manager** that there is no known defect in any part of hull, machinery, fittings and equipment.

### **b. Extension of Annual /Periodical Statutory Surveys or Interim / Initial / Intermediate/ Renewal of Audits/Inspections:**

- i. All efforts are to be made by Owners / Managers to offer their ships to the RO for surveys within the survey window period to complete the surveys/ inspections / audits.
- ii. In general, no extension will be granted /considered unless the Recognized Organization provides in writing that the Surveyor cannot attend the ship due to lock-



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down at any port visited by the ship, after the issue of the DGS Order No.17 of 2020 (29 June 2020).

- iii. For an extension to be considered by the Administration on a **case to case basis**, same will be after a satisfactory Risk assessment, **and will only be granted for the period to enable the ship to reach a port where Recognized organization Surveyor can attend the ship.**

**c. Extension of Intermediate surveys:**

- i. No extension will be granted for a period more than 3-months after the due date of intermediate survey or 42 months since last dry-dock or the date of availability of dry-dock plus 15 days, which-ever is earlier.
- ii. The extension will be granted only upon submission of a firm evidence of date of dry-dock availability from the selected dry-dock.
- iii. The surveys related to Statutory Certificates not requiring dry-dock (such as Safety Equipment/Radio/IOPP/IAPP etc.) are to be completed either prior extension or at the first port, where RO Surveyor can board the ship during the period of extension.
- iv. The extension of surveys of Statutory Certificates requiring dry-dock (such as load-line/Safety Construction etc.) will be extended based on RO recommendation after satisfactory general examination of hull, machinery, fittings (structural and non-structural) and equipment, satisfactory thickness measurement, as applicable, examination of fore-peak ballast tank, aft-peak ballast tank and other representative water-ballast tanks, examination of fore-most and aft cargo holds and one other cargo hold in case of Single-Hull Bulk Carriers and a CCTV examination of the underwater portion of the hull, appendages, propeller and rudder.
- v. The above **Survey for extension** is to be carried out either prior extension or at first port after extension, where RO Surveyor can board the ship. Extension without the stated surveys, even till the next port where a RO Surveyor can attend the ship shall be granted only after a Risk Assessment.

**d. Extension of Renewal surveys beyond three months from expiry date:**

- i. For extension of renewal surveys by 3-months from expiry date or 36 months since last dry-dock, which-ever is earlier, the usual procedure for extension will apply.
- ii. No extension will be granted for a period more than 6-months after the due date of renewal survey or 42 months since last dry-dock or date of availability of dry-dock plus 15 days, which-ever is earlier.

- iii. The extension will be granted only upon submission of a firm evidence of date of dry-dock availability from the selected dry-dock.
- iv. The Surveys related to Statutory Certificates not requiring dry-dock are to be completed to-the extent possible either prior extension or at first port, where RO Surveyor can board the ship during the period of extension. A risk assessment to be conducted for items outstanding to be completed at dry-dock such as 5-yearly load testing of life-boat/rescue boat and launching appliances and to be recommended for extension with the Risk assessment.
- v. The Surveys of Statutory Certificates requiring dry-dock to be progressed as far as practicable. The extension will be based on RO recommendation after a satisfactory general examination of hull, machinery, fitting (structural and nonstructural), equipment's, satisfactory thickness measurement, as applicable, examination of fore-peak ballast tank, aft-peak ballast tank and other representative water-ballast tanks, examination of fore-most and aft cargo holds and one other cargo hold in case of Single-Hull Bulk Carriers and a CCTV examination of the underwater portion of the hull, appendages, propeller and rudder.
- vi. These Surveys are to be carried out either prior extension or at first port after extension, where RO Surveyor can board the ship. Extension without the stated surveys even till the next port where a RO Surveyor can attend the ship shall be granted only after a Risk Assessment.
- vii. In case Service supplier for 5-yearly load test of life-boat/rescue boat and launching appliances is unable to attend due to any reason, Owner can appoint any other local Service supplier who is approved by Directorate but may not be approved by Manufacturer. **In such cases, the testing is to be conducted in presence of RO Surveyor.**

**e. Exemptions from Safe Manning Document:**

Any dispensation from safe manning will be considered by the Administration **on case to case basis** where-in a seafarer is signed-off in an emergency and a risk assessment is submitted.

**f. The extension of surveys beyond the IMO Convention provisions will be under the following conditions:**

- i. If the extension is granted beyond the IMO Convention provisions, the Company, prior entering any foreign load/discharge port, will take permission from relevant Maritime Authorities for acceptance of statutory certificates.
  - ii. The Company is to enhance monitoring by way of increased internal audit and superintendent inspection of their ships to ensure safety of ship and seafarer through its shore staff during the period of extension. **Procedure for such monitoring is to be developed and approved by DPA and records to be maintained for verification at next audit/FSI.**
6. Ship owners/ operators and managers of Indian flagged ships contemplating delay in carrying out mandatory periodical surveys, audits and inspections due to the COVID-19 situation are advised to be guided by above and act accordingly.

**Enclosure:**

DGS Order No. 23 of 2020, dated 19 August 2020.

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नौवहन महानिदेशालय, मुंबई  
DIRECTORATE GENERAL OF SHIPPING, MUMBAI

**DGS Order 23 of 2020**

File No. ENG/MISC-29(73)/09	Date: 19.08.2020
<b>Subject:</b> Extension to the validity of Ship's Statutory Certificates, Periodical Surveys & Audits in view of COVID-19 Pandemic	

1. Noting that there have been difficulties faced by ship-owners to meet the statutory requirements in maintaining the validity of ship and seafarer certificates, due to force majeure situation posed by COVID-19 resulting lock-down of many countries around the world including India, the Directorate vide DGS Order 6 of 2020 dated 23<sup>rd</sup> March 2020, allowed extension of Ship's Statutory Certificates on a case to case basis by three months and extension of one month to the validity of Seafarer Certificate of Competency/Proficiency/Recognition of Equivalence.
2. Noting further that the continued lock-down has resulted in non-availability of Recognized Organization Surveyors, service suppliers and dry-docks, the Directorate vide Addendum No.2 to DGS Order 6 of 2020 dated 21<sup>st</sup> April 2020, allowed extension of ship statutory certificates expiring on/before 31<sup>st</sup> May 2020, beyond what is permitted by various International Conventions, subject to a Risk assessment carried out by Recognized Organization, and imposition of certain specific conditions such as enhanced monitoring of ships from shore by ship managers/owners during this period of extension.
3. Even though the lock-down started easing out with effect from end May 2020, yet many ship-owners faced problems in docking their vessels, either due to continued closure of the dry-docks or inability of the ship-owners to attend the ship at dry-dock due to non-availability of flights to foreign destinations, the Directorate vide DGS Order 13 of 2020 dated 21<sup>st</sup> May, 2020 allowed extension of ship statutory certificates expiring on/before 30<sup>th</sup> June 2020 under revised conditions such as ensuring attendance of the vessel by Recognized Organization, wherever possible, for progressing the surveys as far as practicable.

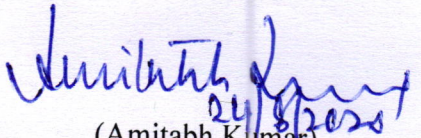
4. Whereas at the request of Indian National Ship Owner Association and also noting long waiting period at various dry-docks around world, which were operating at full capacity to clear backlog, the directorate extended Intermediate/Renewal Surveys requiring Docking via DGS Order 17 of 2020 for ships whose Statutory Certificates were expiring on/prior to 31<sup>st</sup> August 2020. The DGS Order 13 of 2020 remained applicable for ships with statutory certificates expiring on/prior 30 June 2020 and thereafter was replaced by DGS order 17 of 2020, which is currently applicable till 31<sup>st</sup> August 2020.
5. Recognizing the changing situation world-wide and also noting that Recognized Organizations have started carrying out surveys at an increasing number of ports world-wide, the Directorate vide DGS Order 17 of 2020 imposed additional requirements for extension of Annual/Periodical Surveys or Interim/Initial/Intermediate/Renewal Audits/Inspections expiring after 30<sup>th</sup> June 2020 but on/prior to 31<sup>st</sup> August 2020.
6. Whereas now based on the further request of Indian National Ship-Owner Association and also noting that Dry-Docks around the world though operational at full capacity, but taking longer time in dry-dock due to social distancing norms. This results in further delay in docking of the waiting ships. Therefore, the Directorate has now decided to continue grant of extension of Statutory Certificates to ships whose statutory surveys are expiring between 1<sup>st</sup> September 2020 and 31<sup>st</sup> October 2020 under similar procedures as detailed in DGS Order 17 of 2020 which are stated in subsequent paragraphs of this Order.
7. The Risk assessment by RO, where-ever mentioned in this Order, is to be based on past survey, audits and inspection history, satisfactory continuation of past imposed Condition of Class/Statutory Condition, if any, declaration by Master and CE that they have carried out a satisfactory general examination and a declaration by DPA/Owner/Manager that there is no known defect in any part of hull, machinery, fittings and equipment
8. The revised procedure for **extension of Annual/Periodical Statutory Surveys or Interim/Initial/Intermediate/Renewal Audits/Inspections:**
  - a) It is to be noted that, the Convention provisions provide sufficient time ranging between 3-12 months to the ship owners to complete these surveys/inspections/audits. Therefore, all efforts should be made by all owners to offer their ships to the RO for surveys, audits in case these are within the range period.

- b) In general, no extension shall be granted / considered unless the Recognized Organization provides in writing that the Surveyor cannot attend the vessel due to lock-down at any port visited by the ship, after the issue of this Order.
  - c) Even if an extension is to be considered on a case to case basis, same will be after a satisfactory Risk assessment, and same shall only be granted for the period to enable the ship to reach a port where Recognized Organization Surveyor can attend the vessel.
9. **The procedure for extension of Intermediate Surveys shall be:**
- a) No extension shall be granted for a period more than 3-months after the due date of intermediate survey or 42 months since last dry-dock or the date of availability of dry-dock plus 15 days, which-ever is earlier.
  - b) This extension shall be granted only upon submission of a firm evidence of date of dry-dock availability from the selected dry-dock.
  - c) The Surveys related to **Statutory Certificates not requiring dry-dock (such as Safety Equipment/Radio/IOPP/IAPP etc.)** shall be completed either prior extension or at the first port, where RO Surveyor can board the vessel during the period of extension.
  - d) The extension of Surveys of **Statutory Certificates requiring dry-dock (Such as load-line/Safety Construction etc.)** shall be extended based on RO recommendation after satisfactory general examination of hull, machinery, fittings (structural and non-structural) and equipment, satisfactory thickness measurement, as applicable, examination of fore-peak ballast tank, aft-peak ballast tank and other representative water-ballast tanks, examination of fore-most and aft Cargo holds and one other Cargo Hold in case of Single-Hull Bulk Carriers and a CCTV examination of the underwater portion of the hull, appendages, propeller and rudder.
  - e) The above **Survey for extension** is to be carried out either prior extension or at first port after extension, where RO Surveyor can board the vessel. Extension without the stated surveys, even till the next port where a RO Surveyor can attend the ship shall be granted only after a Risk Assessment.
10. **Extension of Renewal Surveys beyond three months from expiry date:**

- a) For extension of renewal surveys by 3-months from expiry date or 36 months since last dry-dock, which-ever is earlier, the usual procedure for extension shall apply.
- b) No extension shall be granted for a period more than 6-months after the due date of renewal survey or 42 months since last dry-dock or date of availability of dry-dock plus 15 days, which-ever is earlier.
- c) This extension shall be granted only upon submission of a firm evidence of date of dry-dock availability from the selected dry-dock.
- d) The Surveys related to **Statutory Certificates not requiring dry-dock** shall be completed to the extent possible either prior extension or at first port, where RO Surveyor can board the vessel during the period of extension. A risk assessment to be conducted for items outstanding to be completed at dry-dock such as 5-yearly load testing of life-boat/rescue boat and launching appliances, load test of accommodation ladder etc. and recommended for extension with the Risk assessment.
- f) The **Surveys of Statutory Certificates requiring dry-dock** to be progressed as far as practicable. The extension shall be based on RO recommendation after a satisfactory general examination of hull, machinery, fitting (structural and non-structural), equipment's, satisfactory thickness measurement, as applicable, examination of fore-peak ballast tank, aft-peak ballast tank and other representative water-ballast tanks, examination of fore-most and aft Cargo holds and one other Cargo Hold in case of Single-Hull Bulk Carriers and a CCTV examination of the underwater portion of the hull, appendages, propeller and rudder.
- e) These Surveys are to be carried out either prior extension or at first port after extension, where RO Surveyor can board the vessel. Extension without the stated surveys even till the next port where a RO Surveyor can attend the ship shall be granted only after a Risk Assessment.
- f) In case Service supplier for 5-yearly load test of life-boat/rescue boat and launching appliances is unable to attend due to any reason, Owner can appoint any other available local Service supplier who is approved by Directorate but may not be approved by Manufacturer and the testing to be conducted in presence of RO Surveyor.



11. **Exemptions from Safe Manning Document:** Any dispensation from safe manning shall be on case to case basis where-in a seafarer is signed-off in an emergency and a risk assessment is submitted.
12. The waiver of applicable extension /dispensation fees for surveys/audits, etc falling due after 31st August 2020 shall not be applicable to ships to which this Order applies.
13. The extension of surveys / audits beyond the IMO Convention provisions will be under the following conditions.
  - a) If the extension is granted beyond the IMO Convention provisions, the Company, prior entering any foreign load/discharge port, will take permission from relevant Maritime Authorities for acceptance of statutory certificates.
  - b) The Company shall enhance monitoring by way of increased internal audit and superintendent inspection of their vessels to ensure safety of ship and seafarer through its shore staff during this period of extension. Procedure for such monitoring to be developed and approved by DPA and records to be maintained for verification at next audit/FSI.
14. All Port State Control Officer are hereby advised to take a pragmatic approach while inspecting foreign ships visiting India till further Orders. Foreign ships with Statutory Certificates, having similar extension of Annual/Periodical/ Surveys by 3-months from expiry date and Interim/Initial/Intermediate/Renewal Audit/Inspection by 3-months beyond expiry date, 42-months period since last dry-docking and renewal surveys extension by 6-months beyond expiry date may be accepted. No ship shall be detained for any other period of extension unless approved by concerned Principal Officer based on present condition of ship.

  
(Amitabh Kumar)  
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