



# Technical Circular

No.: 002/2022

Date: 14<sup>th</sup> January 2022

**Subject: Bahamas Maritime Authority Technical Alert 22-01 Reg Interim Policy on Extension/ Postponement of surveys/ audits and inspections due to COVID-19 pandemic.**

1. In view of the ongoing COVID-19 pandemic, Bahamas Maritime Authority (BMA), vide Technical Alert 22-01, dated 07/01/2022, has established interim policy with regard to extensions, postponements of surveys, audits, inspections etc as outlined below. These measures are temporary and their duration will be based on the global evolution of the COVID-19 pandemic.

**A. Bahamas Initial, Annual and Pre-Registration Inspections:**

- a. Where an initial or annual inspection cannot be carried out before the end of the inspection window, the owner/operator are required to advise the BMA Inspections & Surveys department (tech@bahamasmaritime.com), providing full supporting information. Inspections are to be carried out at the first port where an inspector is available.
- b. Pre-registration inspections are no longer required for ships up to 20 years of age. Ships over 20 years of age will be considered on a case by case basis and inspection requirements will be advised by BMA. For ships over 12 years of age, a pre-purchase or condition report should be submitted where available.
- c. Notwithstanding above para 'b', all ships proposed for registration, except for new builds, remain subject to technical documentation review.

**B. Surveys:**

- a. Where a surveyor is not able to undertake scheduled surveys due to restrictions imposed by COVID-19, including cancellation of scheduled dry docking and/or bottom survey, and remote survey is not practicable, the Administration authorises its Recognised Organisations to consider applications for extension/postponement under force majeure or unforeseen exceptional circumstances and make a suitable recommendation to the Administration. This is to be followed up by a physical survey at the earliest opportunity.

- b. For statutory surveys delegated to Bahamas Recognised Organisations, the Recognised Organisation to consider the application, which should include full supporting information, before issuing short-term certification. The Master is to provide a statement to the Recognised Organisation confirming the structure or equipment to be surveyed remains fit for purpose and has not been subject to any damage.
- c. Where the structure or equipment to be surveyed does not remain fit for purpose, or has suffered damage, or the Recognised Organisation does not support the application, the Recognised Organisation is to provide full details to the BMA. The BMA will consider on a case-by-case basis and provide instructions to the Recognised Organisation.

**C. ISM and ISPS Internal Audits:**

- a. The Administration temporarily permits extensions to annual ISM internal audits for up to 3 months, in cases where it is not physically possible to attend and remote audit is not practicable. This is to be followed up by a physical audit at the earliest opportunity.
- b. The Company Security Officer may postpone internal ISPS audits for up to 3 months in cases where it is not physically possible to attend, and remote audit is not practicable. This is to be followed up by a physical audit at the earliest opportunity.

**D. ISM External Audits:**

- a. For interim ISM DOC audits, where it is not physically possible to attend and remote audit is not practicable, the Administration may permit the issue of interim DOC upon receipt by the Recognised Organisation of a statement from the Company confirming that the safety management system is in place and meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.
  - b. The requirement for the Recognised Organisation to advise the BMA of any request for audit for the first issue of a Bahamas DOC, remains in effect.
  - c. For interim ISM SMC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issuance of interim SMC, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Master confirming that the safety management system is in place and meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.
-

- d. For initial ISM DOC and SMC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim DOC/SMC for up to 6 months, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that the safety management system meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.
- e. For SMC and DOC periodical audits, if these are not completed within the range date, the certificate ceases to be valid as per ISM Code. In such circumstances, the Recognised Organisation may issue a new SMC or DOC valid for 3 months or until the audit can take place, whichever comes first, without prior approval of the BMA.
- f. For SMC and DOC renewal audits, and noting the provisions of ISM Code 13.14, the BMA authorises its Recognised Organisations to issue 3-month extensions, where requested by the Company, to existing SMC and DOC Certificates, without prior approval of the BMA.

**E. ISPS External Audits:**

- a. For interim ISSC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of an interim ISSC, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company Security Officer and Ship Security Officer confirming that:
  - i. A Ship Security Assessment has been completed.
  - ii. A copy of the Ship Security Plan (SSP) is on board and there is evidence that the SSP has been submitted to the Recognised Organisation for approval.
  - iii. The security measures identified in the Ship Security Plan are in place and the provisions of paragraph 19.4.2 of the ISPS Code have been met.

This is to be followed up by a physical audit at the earliest opportunity.

- b. For initial ISSC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim ISSC for up to 6 months upon receipt by the Recognised Organisation of a statement from the Company Security Officer and Ship Security Officer, as per above para 'a, i to iii', without prior approval of the BMA.  
This is to be followed up by a physical audit at the earliest opportunity.
  - c. For ISSC intermediate audits, if these are not completed within the range date, the certificate ceases to be valid as per ISPS Code A19.3.8. In such circumstances, the Recognised Organisation may issue a new ISSC valid for 3 months or until the audit can take place, whichever comes first, without prior approval of the BMA.
-

- d. For ISSC renewal audits, noting the provisions of ISPS Code A-19.3.5, the BMA authorises its Recognised Organisations to issue 3-month extensions, where requested by the Company, to existing ISSC Certificates, without prior approval of the BMA

**.Maritime Labour Inspections:**

- a. For interim MLC inspections where it is not physically possible to attend and remote inspection is not practicable, the BMA permits the issuance of an interim MLC for up to 6 months, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that:
  - i. The applicable requirements of MLC 2006 have been met.
  - ii. An approved Declaration of Maritime Labour Compliance Part I is on board or evidence provided that it has been requested from the BMA.
  - iii. DMLC Part II is available in draft or evidence provided that it has been submitted to the Recognised Organisation.

This is to be followed up by a physical audit at the earliest opportunity.

- b. For initial MLC inspections where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issuance of a second interim MLC for up to 6 months, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company/Master, as per above para 'a, i to iii'.

This is to be followed up by a physical audit at the earliest opportunity.

- c. MLC 2006 does not provide for the issuance of extensions to existing MLC Certificates without inspection. However, in this exceptional situation, the BMA authorises its Recognised Organisations to administratively issue a short-term Maritime Labour Certificate for 3 months, without prior approval of the BMA, in cases where the renewal or intermediate inspection cannot be conducted due to COVID-19 restrictions.
- d. The Recognised Organisation to state that the certificate has been issued to allow the ship to continue on its intended voyage and complete the inspection at the first port where inspectors are available. When the renewal or intermediate inspection has been completed a full-term Maritime Labour Certificate may be issued with its expiry date not later than 5 years from the expiry date of the original full-term Maritime Labour Certificate.

**F. Remote audits and surveys:** The BMA will consider requests for remote audits and surveys where supported by the Recognised Organisation.

---

G. The temporary measures described in paragraphs A to G will remain in place until further notice from the Administration in this regard and are subject to review by the Administration as the situation develops.

**H. Seafarer Employment:**

Where, as a result of travel restrictions imposed due to the COVID-19 pandemic, crew members employed on board are prevented from being repatriated, shipowners to immediately inform the BMA to seek a solution to repatriate the seafarers - email: STCW@bahamasmaritime.com

**I. Expired Medical Certificates:**

For any seafarer's Medical Certificate which expires whilst they are on board, the BMA allows the seafarer to continue their service for up to 3 months from the date of expiry. Every effort is to be made to obtain a new seafarers' medical certificate such that a valid certificate will be in place before the expiry of the extension.

**J. Expired STCW Certificates and Certificates of Recognition (Endorsements):**

- a. If a Certificate of Competency (CoC) or a Certificate of Proficiency (COP) that The Bahamas has endorsed expires and the issuing State has extended the period of validity of the certificate, this document/endorsement will automatically be extended by the Bahamas Administration for the same period.
- b. The BMA recognises that all CoPs that are issued by other States (these do not need to be endorsed) are valid for use on Bahamian ships for the period that the issuing State has allowed.
- c. All STCW, MLC and Minimum Safe Manning Documents are issued electronically and sent by e-mail. Hard copies are not issued.

**K. Seaman's Record Books:**

- a. Where seafarers are not in possession of a Seaman's Record Book, the BMA requests that the Master issues a Record of Service as stipulated in paragraphs 3.3 and 3.4 of BMA Information Bulletin No. 107.
  - b. Notwithstanding the above, Administration has advised that BMA will still issue Seaman's Record Books and clients are encouraged to apply online through the BORIS electronic system. When the Seaman's Record Book is issued the BMA will send an electronic copy to the client to be used onboard.
  - c. The BMA will send the original Seaman's Record Books by courier as usual.
-

2. Ship owners/ operators and masters of Bahamas flagged ships are advised to be guided by above.
3. **This Technical Circular supersedes and revokes earlier Technical Circular No. 024/2020, dated 26<sup>th</sup> March 2020.**

**Enclosure:**

1. Bahamas Maritime Authority Technical Alert 22-01, Version No. 1.0, dated 07/01/2022

---

Whilst the utmost care has been taken in the compilation of the Technical Information, neither Indian Register of Shipping, its affiliates and subsidiaries if any, nor any of its directors, officers, employees or agents assume any responsibility and shall not be liable to any person for any loss, damage or expense caused in any manner whatsoever by reliance on the information in this document.

---

---

## COVID-19

---

---

### 1. Purpose

- 1.1. This Technical Alert is issued by the Bahamas Maritime Authority (BMA) to provide information on COVID-19 related issues.

### 2. Introduction

- 2.1. The BMA has issued Technical Alerts to provide guidance throughout the COVID-19 pandemic.
- 2.2. This Technical Alert supersedes previous Technical Alerts 20-03 and 21-01.

### 3. Actions to be taken in case of suspected cases

- 3.1. Where COVID-19 is suspected, medical advice should be sought.
- 3.2. The advice of public health authorities in the country where the ship is located when cases are suspected should be sought and any instructions followed.
- 3.3. Owners/operators are requested to report any suspected or confirmed cases of COVID-19 to the BMA by email: [health@bahamasmaritime.com](mailto:health@bahamasmaritime.com).

### 4. Inspections, surveys and audits

- 4.1. As a result of the ongoing challenges the COVID-19 pandemic poses to the shipping industry, the BMA continues to take a pragmatic and practical approach regarding extensions, postponements, etc. as outlined below. These measures are temporary, and their duration will be based on the global evolution of the COVID-19 pandemic.

#### 4.2. **Bahamas Initial, Annual and Pre-Registration Inspections**

- 4.2.1. BMA inspectors have been instructed not to put themselves at risk and likewise not to put ship's crews at risk - this means they will follow the guidance of the health authorities in the country where they are located and may decline to attend ships.
- 4.2.2. The BMA expects initial and annual inspections to be carried out by physical attendance, where possible. Where an initial or annual inspection cannot be carried out before the end of the inspection window, the owner/operator shall advise the BMA Inspections & Surveys department ([tech@bahamasmaritime.com](mailto:tech@bahamasmaritime.com)), providing full supporting information. Inspections should be carried out at the first port where an inspector is available.
- 4.2.3. Pre-registration inspections are no longer required for ships up to 20 years of age. Ships over 20 years of age will be considered on a case by case basis and inspection requirements will be advised by BMA. For ships over 12 years of age, a pre-purchase or condition report should be submitted where available.
- 4.2.4. Notwithstanding para 4.2.3, all ships proposed for registration, except for new builds, remain subject to technical documentation review.

#### 4.3. **Surveys**

- 4.3.1. The BMA expects surveys to be carried out by physical attendance, where possible. Where a surveyor is not able to undertake scheduled surveys due to restrictions imposed by COVID-19, including cancellation of scheduled dry docking and/or bottom survey, and remote survey is not practicable, the BMA authorises its Recognised Organisations to consider applications for extension/postponement under *force majeure* or unforeseen exceptional circumstances and make a suitable recommendation to the BMA. This is to be followed up by a physical survey at the earliest opportunity.
- 4.3.2. For statutory surveys delegated to Bahamas Recognised Organisations, the Recognised Organisation shall consider the application, which should include full supporting information, before issuing short-term certification. The Master shall provide a statement to the Recognised Organisation confirming the structure or equipment to be surveyed remains fit for purpose and has not been subject to any damage.
- 4.3.3. Where the structure or equipment to be surveyed does not remain fit for purpose, or has suffered damage, or the Recognised Organisation does not support the application, the Recognised Organisation shall provide full details to the BMA. The BMA will consider on a case-by-case basis and provide instructions to the Recognised Organisation.

#### 4.4. **ISM and ISPS Internal Audits**

- 4.4.1. Timely completion of ISM internal audits is amongst the most frequently reported difficulties. In cases where it is not physically possible to attend and remote audit is not practicable, the BMA temporarily permits extensions to annual ISM internal audits for up to 3 months (in line with paragraph 5.6.2 of [Marine Notice 46](#) and para 12.1 of the ISM Code). This is to be followed up by a physical audit at the earliest opportunity.
- 4.4.2. The Company Security Officer may postpone internal ISPS audits for up to 3 months in cases where it is not physically possible to attend, and remote audit is not practicable. This is to be followed up by a physical audit at the earliest opportunity.

#### 4.5. **ISM External Audits**

- 4.5.1. For interim ISM DOC audits where it is not physically possible to attend and remote audit is not practicable, the BMA may permit the issue of interim DOC upon receipt by the Recognised Organisation of a statement from the Company confirming that the safety management system is in place and meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.
- 4.5.2. The requirement for the Recognised Organisation to advise the BMA of any request for audit for the first issue of a Bahamas DOC, as per paragraph 4.2.2 of [Marine Notice 46](#), remains in effect.
- 4.5.3. For interim ISM SMC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of interim SMC, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Master confirming that the safety management system is in place and meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.
- 4.5.4. For initial ISM DOC and SMC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim DOC/SMC for up to 6 months, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that the safety management system meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.
- 4.5.5. For SMC and DOC periodical audits, if these are not completed within the range date the certificate ceases to be valid as per ISM Code. In such circumstances, the Recognised Organisation may issue a new SMC or DOC valid for 3 months or until the audit can take place, whichever comes first, without prior approval of the BMA.

- 4.5.6. For SMC and DOC renewal audits, and noting the provisions of ISM Code 13.14, the BMA authorises its Recognised Organisations to issue 3-month extensions, where requested by the Company, to existing SMC and DOC Certificates, without prior approval of the BMA.
- 4.6. **ISPS External Audits**
- 4.6.1. For interim ISSC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of an interim ISSC, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company Security Officer **AND** Ship Security Officer confirming that:
- i. A Ship Security Assessment has been completed.
  - ii. A copy of the Ship Security Plan (SSP) is on board and there is evidence that the SSP has been submitted to the Recognised Organisation for approval.
  - iii. The security measures identified in the Ship Security Plan are in place and the provisions of paragraph 19.4.2 of the ISPS Code have been met.

This is to be followed up by a physical audit at the earliest opportunity.

- 4.6.2. For initial ISSC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim ISSC for up to 6 months upon receipt by the Recognised Organisation of a statement from the Company Security Officer **AND** Ship Security Officer, as per 4.7.1.i to iii, without prior approval of the BMA.

This is to be followed up by a physical audit at the earliest opportunity.

- 4.6.3. For ISSC intermediate audits, if these are not completed within the range date the certificate ceases to be valid as per ISPS Code A19.3.8. In such circumstances, the Recognised Organisation may issue a new SMC or ISSC valid for 3 months or until the audit can take place, whichever comes first, without prior approval of the BMA.
- 4.6.4. For ISSC renewal audits, noting the provisions of ISPS Code A-19.3.5, the BMA authorises its Recognised Organisations to issue 3-month extensions, where requested by the Company, to existing ISSC Certificates, without prior approval of the BMA.

4.7. **Maritime Labour Inspections**

- 4.7.1. For interim MLC inspections where it is not physically possible to attend and remote inspection is not practicable, the BMA permits the issue of an interim MLC for up to 6 months, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that:
- i. the applicable requirements of MLC 2006 have been met.

- ii. An approved Declaration of Maritime Labour Compliance Part I is on board or evidence provided that it has been requested from the BMA.
- iii. DMLC Part II is available in draft or evidence provided that it has been submitted to the Recognised Organisation.

This is to be followed up by a physical audit at the earliest opportunity.

- 4.7.2. For initial MLC inspections where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim MLC for up to 6 months, without prior approval of the BMA, upon receipt by the Recognised Organisation of a statement from the Company/Master, as per 4.8.1.i to iii.

This is to be followed up by a physical audit at the earliest opportunity.

- 4.7.3. MLC 2006 does not provide for the issue of extensions to existing MLC Certificates without inspection. However, in this exceptional situation, the BMA authorises its Recognised Organisations to administratively issue a short-term Maritime Labour Certificate for 3 months, without prior approval of the BMA, in cases where the renewal or intermediate inspection cannot be conducted due to COVID-19 restrictions.

- 4.7.4. The Recognised Organisation shall state that the certificate has been issued to allow the ship to continue on its intended voyage and complete the inspection at the first port where inspectors are available. When the renewal or intermediate inspection has been completed a full-term Maritime Labour Certificate may be issued with its expiry date not later than 5 years from the expiry date of the original full-term Maritime Labour Certificate.

4.8. **Remote audits and surveys**

- 4.8.1. The BMA will continue to consider requests for remote inspections, audits and surveys, where supported by the Recognised Organisation.

- 4.9. **The Recognised Organisation shall provide a consolidated monthly report to the BMA (by email to [tech@bahamasmaritime.com](mailto:tech@bahamasmaritime.com)) of actions taken under paragraphs 4.3, 4.5, 4.6 & 4.7. The monthly report should be submitted by the 10<sup>th</sup> of the following month.**

- 4.10. The temporary measures described in paragraphs 4.2 to 4.8 will remain in place until further notice and are subject to review as the situation develops.

## 5. Seafarers and manning

5.1. Reference is made to IMO Circular Letter No.4204 and ILO Statement from the “Special Tripartite Committee of the Maritime Labour Convention 2006 as amended”.

### 5.2. **Seafarer Employment**

5.2.1. Where, as a result of travel restrictions imposed due to the COVID-19 pandemic, crew members employed on board are prevented from being repatriated, shipowners should immediately inform the BMA to seek a solution to repatriate the seafarers - email: [STCW@bahamasmaritime.com](mailto:STCW@bahamasmaritime.com)

5.2.2. It shall be born in mind that The World Health Organisation, The International Labour Organisation and The International Maritime Organisation have announced that Seafarer shall be determined as essential workers and port states shall permit repatriation of seafarers.

5.2.3. Should administrations or port authorities have questions or queries regarding the above they should contact the BMA directly.

5.2.4. Should companies face issues pertaining to medical assistance for crewmembers or repatriation, the BMA may be able to assist, if the issues are reported in due time.

### 5.3. **Expired Medical Certificates**

5.3.1. It is assumed that countries are not restricted from issuing medical certificates to seafarers due to the pandemic.

5.3.2. For any seafarer’s Medical Certificate which expires whilst they are on board, the BMA will allow the seafarer to continue their service for up to 3 months from the date of expiry. Every effort is to be made to obtain a new seafarers’ medical certificate such that a valid certificate will be in place before the expiry of the extension.

### 5.4. **Expired STCW Certificates and Certificates of Recognition (Endorsements)**

5.4.1. If a Certificate of Competency (CoC) or a Certificate of Proficiency (COP) that The Bahamas has endorsed expires and the issuing State has extended the period for which the certificate is valid, this document/endorsement shall automatically be extended by The Bahamas for the same period.

5.4.2. The BMA recognises that all CoPs that are issued by other States (these do not need to be endorsed) are valid for use on Bahamian ships for the period that the issuing State has allowed.

5.4.3. STCW, MLC and Minimum Safe Manning Documents are all issued electronically and sent by e-mail to the client. Hard copies are not issued.

**5.5. STCW Training Provider Approvals**

- 5.5.1. BMA expects to be able to continue the normal process to visit training institutions for audits towards the end of first quarter/beginning of second quarter in 2022. In the meantime, the following approval process remains in force.
- 5.5.2. Due to the limitations caused by the COVID-19 pandemic, re-approval of existing courses/training will take the following temporary form:
- i. the relevant training materials/content is to be submitted to the BMA for review;
  - ii. subject to satisfactory review, the approval will be granted for a period of 5 years;
  - iii. an on-site visit will take place to verify the effectiveness of the course and its delivery as soon as practically possible following the satisfactory review;
  - iv. the requirement for an intermediate verification (between the 2nd & 3rd anniversary) remains extant (COVID-19 permitting).

**5.6. Seaman's Record Books**

- 5.6.1. Where seafarers are not in possession of a Seaman's Record Book, the BMA requests that the Master issues a Record of Service as stipulated in paragraphs 3.3 and 3.4 of [BMA Information Bulletin No. 107](#).
- 5.6.2. Notwithstanding the above, the BMA will still issue Seaman's Record Books and clients are encouraged to apply online through the BORIS electronic system. When the Seaman's Record Book is issued the BMA will send an electronic copy to the client to be used onboard. A copy of the Record of Service template, for use with the electronic copy of the Seaman's book, is attached.
- 5.6.3. The BMA will send the original Seaman's Record Books by courier as usual.

**5.7. Crew changes in The Bahamas**

- 5.7.1. The Bahamas remains under national restrictions in accordance with the Emergency Powers (COVID 19 Pandemic) Order 2020.
- 5.7.2. Crew changes are being allowed subject to conditions including the need for the crew member to have a COVID 19 test within 5 days of landing, be fully vaccinated and have a valid travel health visa.
- 5.7.3. Details of the process for obtaining the travel Visa are outlined in the Bahamas Government website – see <https://travel.gov.bs/international> .

## **6. Further information**

6.1. Bahamas government:

- i. [Ministry of Health Home Page](#)
- ii. [Travel Updates](#)
- iii. [Travel Health Certificate Application](#)

6.2. World Health Organization:

- i. [Rolling Updates](#)
- ii. [Information and Guidance on COVID-19](#)
- iii. [Management of COVID-19 onboard cargo Ships](#)

6.3. International Maritime Organization:

- i. [Coronavirus Information Page](#)

6.4. Further information is also available from a number of industry bodies, governmental and inter-governmental agencies.

## **7. Validity**

7.1. This Technical Alert is valid until further notice.

## **8. Revisions**

V1.0 First issue