



Technical Circular

No.: 092/2020

Date: 25th June 2020

Subject: Comoros Maritime Circular Ref No. 20/01855/COM on COVID-19 – Guidance relating to the postponement /extension of statutory certification & services

1. The Maritime Administration of Comoros vide Circular Ref No. 20/01855/COM has provided following guidance relating to the postponement/extension of statutory certification and surveys including ISM / ISPS and MLC audits/ inspections as an exceptional measures in view of outbreak of COVID-19 pandemic.
 - a. Where a surveyor is not able to undertake scheduled surveys due to restrictions imposed by COVID-19, Recognized Organizations to request authorization for issuance of a Conditional Certificate **valid for three (3) months** using remote surveys, provided all relevant records and justifications are reported to the Administration.
 - b. In case of annual servicing of life saving appliances and firefighting equipment **expiring between June and August 2020**, application is to be made via RO for extension for a maximum of **three (3) months** period, submitting also an official statement by the Master of the ship that the equipment is in good operational condition.
 - c. Vessels holding a Conditional Certificate due to deficiencies or damages onboard, which cannot be rectified or corrected, shall in coordination with their RO communicate with the Administration for further guidance.
 - d. All statutory certificates (except for Conditional Certificates) **expiring between June and August 2020** will exceptionally be extended for a period of **three (3) months** including DOC/SMC/ISSC/MLC and Exemption Certificates, subject to RO's acceptance and in coordination with it.
 - e. The postponement/ Extension of the inspection of the outside ship's bottom will continue to be processed on a case by case basis. Inspections afloat using remote inspection techniques might be allowed under exceptional circumstances. Extensions beyond three (3) months may require a Risk Assessment approved by the RO, including mitigation measures.

- f. An extension for a period of **three (3) months** from the below indicated deadlines will be granted by the Administration for the following regulations of MARPOL Convention /Annex VI;
- i. The notification of fuel oil consumption data within a period of three months from the end of each calendar year (Reg. 22A.3), whose deadline was **31st March 2020**;
 - ii. The issuance of the Statement of Compliance related to the ships fuel consumption data reports (Reg. 6.6), whose deadline was on **31st May 2020**; and
 - iii. The report of the fuel oil consumption data of the ships, after the issuance of the Statement of Compliance of said ships (Reg.22A.9), whose deadline will be **30 June 2020**.
- g. The validity of colour copies of Original Certificates as per Administration's Circular 18/01165/COM, issued as of June 2020 and afore, to be considered valid for a **three (3) months** period.
2. The measures stated above is effective immediately. However, the attached circular will not apply once the current crisis due to the pandemic is overcome and the RO consider as safe and risk-free to perform the relevant surveys/audits.
 3. Ship owners/ operators and masters of Comoros flagged ships are advised to be guided by above.
 4. **This Technical Circular supersedes and revokes earlier Technical Circular No. 029/2020, dated 31st March 2020.**

Enclosure: Comoros Maritime Circular Ref No. 20/01855/COM, dated 18 June 2020.

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Ref No. : 20/01855/COMDate : 18.06.2020Page : 1 (One)**To,**

OWNERS/MANAGERS, DEPUTY COMMISSIONERS (DCS),
COMPANY SECURITY OFFICERS (CSOS), MASTERS,
RECOGNIZED ORGANIZATIONS (ROS), PORT STATE CONTROL AUTHORITIES (PSCS)

SUBJET: Coronavirus (COVID-19) – Guidance Relating to the Postponement/Extension of Statutory Certification & Services

This Administration taking into consideration the Coronavirus (COVID-19) outbreak and its declaration by the World Health Organization (WHO) as a pandemic, shall allow, as an exceptional measure and as a response to the current worldwide lock downs and travel restrictions, in order to keep the maritime trade safe and secure, the postponement and/or extension of all statutory certification and all survey services including ISM Code/ISPS Code audits and inspections related to MLC, 2006.

1. Recognized Organizations (ROs) shall request authorization for the issuance of Conditional Certificates valid for three (3) months using remote surveys, in cases where physical visits are not possible, provided all relevant records and justifications are reported, the soonest, to this Administration;
2. Annual services of life saving appliances and firefighting equipment expiring between June and August 2020, shall apply via vessels' ROs for extension for a maximum of three (3) month period, submitting also an official statement by the Master of the ship that the equipment is in good operational condition;
3. Vessels holding Conditional Certificates due to deficiencies or damages on board, which cannot be rectified or corrected, in coordination with their RO, shall communicate with this Administration for further guidance;
4. All statutory certificates (except for Conditional Certificates) expiring between June and August 2020 shall exceptionally be extended for a maximum of three (3) month period, including DOC/SMC/ISS/MLC and Exemption Certificates, subject to RO's acceptance and in coordination with it;
5. The postponement/Extension of the inspection of the outside ships' bottom will continue to be processed on a case by case basis. Inspections afloat using remote inspection techniques might be allowed under exceptional circumstances. Extensions beyond three (3) months may require a Risk Assessment approved by the RO, including mitigation measures;

6. In compliance with the following regulations of MARPOL Convention/Annex VI, an extension for a period of three (3) months from the below indicated deadlines shall be granted:
 - a) The notification of fuel oil consumption data within a period of three months from the end of each calendar year (rule 22A.3), whose deadline was March 31, 2020;
 - b) The issuance of the Statement of Compliance related to the ships fuel consumption data reports (rule 6.6), whose deadline was on May 31, 2020; and
 - c) The report of the fuel oil consumption data of the ships, after the issuance of the Statement of Compliance of said ships (rule 22A.9), whose deadline will be June 30, 2020.
7. The validity of Colour Copies of Original Certificates as per this Administration's Circular "18/01165/COM", herewith attached underneath, issued as of June 2020 and afore, shall be considered valid for a three (3) month period;
8. This Circular is effective immediately, due to the urgency of the circumstances, however once the current worldwide crisis due to the pandemic is overcome, our regular procedures will return. It shall be noted that this circular does not apply when the RO considers as safe and risk-free to perform the relevant surveys/audits;
9. The Administration will continue evaluating the current worldwide situation due to the Covid-19. Further extensions (re-extension) might be granted on a case by case basis and after throughout evaluation of the circumstances beyond the control of the operator, upon relevant evidence is provided.

1. Contact

Should you require any additional information, you may contact our Technical Department as provided below:

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Ref No. : 18/01165/COM
Date : 16.07.2018

To,
OWNERS/MANAGERS, DEPUTY COMMISSIONERS (DCS), SEAFARERS,
PORT STATE CONTROL AUTHORITIES, RECOGNIZED ORGANIZATIONS (ROS)

SUBJET: **VALIDITY OF COLOR COPIES OF ORIGINAL DOCUMENTS ON-BOARD VESSELS FLYING THE FLAG OF COMOROS**

1. Purpose

1.1. The purpose of this Circular is to inform all parties concerned about the policy of this Administration regarding the policy on the validity of color copies of original documents as mentioned in sections 3 and 4 of this Circular for the vessels flying the Flag of Comoros.

2. Application

2.1. This Circular applies to all Comorians vessels trading internationally with immediate effect.

3. Policy

3.1. Copies of the documents mentioned in section 4 will be considered as valid and will be accepted on-board all Comorian flagged vessels for a period of not more than 30 calendar days after their issuance. The copies of these documents will also be considered as evidence that an application has been made and is being processed until the original documents are received on-board.

4. Documents to which Circular applies

4.1. Each The Documents to which this circular applies are the following:

4.1.1. **Certificates related to vessels (Provisional/Permanent)**

- Registration Certificate
- Ship's Radio Station License
- Minimum Safe Manning
- Continuous Synopsis Record



- Certificate of Insurance or Other Financial Security in Respect of Civil Liability for Oil Pollution Damage
- Certificate of Insurance or Other Financial Security in Respect of Civil Liability for Bunker Oil Pollution Damage
- Certificate of Insurance or Other Financial Security in Respect of Liability for the Removal of Wrecks
- International Tonnage Certificate '69
- Ballast Water Management Statement of Compliance
- Exemption Certificates
- Attestation Letters

4.1.2. Certificates related to Seafarers (Provisional/Permanent)

- Permissions issued under the STCW, as amended
- Endorsements attesting the recognition of a Certificate under STCW, as amended
- Attestation letters
- Dispensation letters
- Exemption Certificates

5. Contact

Should you require any additional information, you may contact our Technical Department as provided below:

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We take this opportunity to reassure that human life, marine environment and property are always considered as a priority for the Maritime Administration of Comoros which is committed to the safety of the maritime industry and the users around the world.

**Maritime Affairs Department**

Said Salim
Registrar