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Circular Letter No.4241
30 March 2020

To: All IMO Members
Intergovernmental organizations
Non-governmental organizations in consultative status

Subject: **Communications from the Governments of:**
i the Republic of Croatia; and
ii the Hellenic Republic

The Governments of the Republic of Croatia and the Hellenic Republic have sent the attached communications, dated 18 March and 27 March 2020 respectively, with the request that they are circulated by the Organization.



REPUBLIC OF CROATIA
**Ministry of Sea, Transport and
Infrastructure**



CLASS: 810-03/20-01/30
FILE. NO.: 530-04-3-1-20-2
Zagreb, 18 March 2020

**Subject: GUIDELINES FOR ADOPTION OF EXTRAORDINARY MEASURES
RESULTING FROM THE COVID-19 PANDEMIC
- URGENT MEASURES ADOPTED BY THE REPUBLIC OF CROATIA**

Due to the extraordinary situation resulting from the COVID-19 pandemic, allow us to inform you that the Ministry of Sea, Transport and Infrastructure of the Republic of Croatia has decided to adopt attached measures for seafarers who are not able to revalidate all the documents required for service on board ships.

In order to give full effect to the international agreed standards of training and certification of seafarers, the Republic of Croatia has developed the national legal framework implementing all prescribed standards.

However, we believe that this extraordinary situation required adoption of urgent measures following all the pragmatic solutions that do not jeopardize safety and taking into account that there are total of 6662 of Croatian seafarers currently embarked on board vessels engaged in international navigation who are unable to disembark and repatriate to the Republic of Croatia.

In accordance with our statistical data a numerous of seafarers will face with the expired certificates and documents in the following 3 (three) months.

We would also like to highlight that this adopted measures **does not substantially affect the competence of the seafarer.**

In that context and in the light of this situation that can be declared as a *force majeure*, **the Ministry has decided to grant a general extension of the validity of seafarers personal documents up to 3 (three) months for those which will expire before 18 June 2020 in order to allow them to work legally**, in respect of the following:

- Certificates of Competency (CoC) and Certificates of Proficiency (CoP)
- Medical certificates
- Endorsements of foreign certificates
- Seamen's books, Embarkation permits and Seafarers identity documents.

In respect of the extension of sea service beyond the seafarer employment agreement period and due to the difficulties in inability to organize repatriation of the seafarers, appropriate measures has also been adopted as written in attached Guidelines.

It is also important to emphasize that these Guidelines are adopted after consultation with the shipowners' and seafarers' organizations concerned.

Informing you all of the above, I would like to kindly request the circulation of this information to the Parties of the International Maritime Organization and the International Labour Organization in order to avoid further difficulties to the seafarers concerned.

Yours Sincerely,

Attachment



Delivery:

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4, ALBERT EMBANKMENT
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**DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT
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**SECRETARIAT OF ABUJA MOU ON PSC
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REPUBLIC OF CROATIA
Ministry of Sea, Transport and
Infrastructure

CLASS: 810-03/20-01/30
FILE. NO.: 530-04-3-1-20-1
Zagreb, 18 March 2020



TO WHOM IT MAY CONCERN

**Subject: GUIDELINES FOR ADOPTION OF EXTRAORDINARY MEASURES
RESULTING FROM THE COVID-19 PANDEMIC**

Due to the extraordinary situation resulting from the COVID-19 pandemic, the Ministry of Sea, Transport and Infrastructure of the Republic of Croatia (hereinafter: the Ministry) has decided to adopt measures for seafarers who are not able to revalidate all the documents required for service on board ships.

In that context and in the light of this extraordinary situation that can be declared as a *force majeure* situation, the Ministry has decided to grant a general extension of the validity of seafarers personal documents in order to allow them to work legally.

**1. EXTENSION OF THE VALIDITY OF SEAFARERS DOCUMENTS
BEYOND THEIR EXPIRY DATE**

**1.1. CERTIFICATES OF COMPETENCY AND CERTIFICATES OF
PROFICIENCY**

The Ministry has decided that the validity of Croatian Certificates of Competency (CoC) and Certificates of Proficiency (CoP) which will expire before 18 June 2020 are granted a general extended validity of up to 3 (three) months.

The individual seafarer will not be required to submit an application.

1.2. MEDICAL CERTIFICATES

Considering this situation as a *force majeure*, in respect of the Croatian medical certificates, the Ministry has decided to follow provisions for urgent cases allowed by the Regulation I/9 of the STCW Convention 1978 as amended Regulation 1.2. of the MLC Convention 2006 as amended.

Based on that, the Ministry permits a seafarer to work without a valid medical certificate, provided that:

- the period does not exceed 3 (three) months; and
- the seafarer concerned holds and expired medical certificate on recent date.

1.3. ENDORSEMENT OF FOREIGN CERTIFICATES

The validity of Croatian endorsements will be linked to the validity of the seafarer's national Certificates of Competency (CoC) and Certificates of Proficiency (CoP).

If the seafarer's national Certificates of Competency (CoC) or Certificates of Proficiency (CoP) is revalidated, it will be possible to apply for a new endorsement to the Ministry.

The seafarer will then be granted a Temporary endorsement valid for a period up to 3 (three) months.

If the administration that has issued the seafarer's national Certificates of Competency (CoC) or Certificates of Proficiency (CoP) chooses a general extension of the validity of the national Certificates of Competency (CoC) or Certificates of Proficiency (CoP), the validity of the Croatian endorsement issued based on the current Certificates of Competency (CoC) or Certificates of Proficiency (CoP) will automatically be considered extended accordingly.

The seafarer will not be required to submit an application.

1.4. SEAMEN'S BOOKS, EMBARCATION PERMITS AND SEAFARERS IDENTITY DOCUMENTS

The Ministry has decided that the validity of seamen's books, embarkation permits and seafarers identity documents which will expire before 18 June 2020 are granted a general extended validity of up to 3 (three) months.

The individual seafarer will not be required to submit an application.

2. EXTENSION OF SEA SERVICE BEYOND THE SEAFARER EMPLOYMENT AGREEMENT PERIOD

Due to the difficulties in inability to organize repatriation of the seafarers, the shipowners may extend the validity of the Seafarers Employment Agreement for a maximum period of 3 (three) months, if the seafarer concerned agrees with the extension period and if it is in accordance with applicable collective bargaining agreement.

In this situation, it is required to conclude an Addendum of the Seafarer Employment Agreement under the same terms and conditions as the underlying Agreement.

3. NOTIFICATION

The Ministry of Sea, Transport and Infrastructure of the Republic of Croatia will notify all interested organizations (IMO, ILO, European Commission and others) on the above adopted measures.

These Guidelines will be also published on official Ministry's website: www.mmpi.hr.

4. CONTACT FOR ADDITIONAL INFORMATION

For any additional information, please do not hesitate to contact us through the following e-mail address: pomorci@pomorstvo.hr

Yours sincerely,





HELLENIC REPUBLIC
MINISTRY OF MARITIME AFFAIRS AND INSULAR POLICY

HELLENIC COAST GUARD HEADQUARTERS
GENERAL DIRECTORATE FOR SHIPPING
GENERAL DIRECTORATE FOR SHIPS' CONTROL

CIRCULAR

SUBJECT: "MEASURES TAKEN BY THE HELLENIC MARITIME ADMINISTRATION WITH RESPECT TO COVID-19"

1. General

The recent outbreak of COVID-19, now declared by the WHO as pandemic, is causing a number of issues and problems to the shipping industry. The Hellenic Maritime Administration wishes to inform the shipping community of the following extraordinary measures adopted aiming at maintaining the smooth operational supply chain for maritime freight transportation, while securing high standards for the protection of public health.

These measures take into consideration the challenges emerging from mandatory quarantine, the precautionary measures being taken by a number of port authorities around the world as well as the prescriptions of the WHO and the National Organization of Public Health, the EU communications and guidelines and the relevant IMO Circulars and initiatives.

Updated information as regards circulars, decisions and health guidance provided by the international and national institutions are available online at the [Hellenic Coast Guard website](#).

2. Reporting Requirements

Prior to the arrival in Greek port ship masters shall submit through the National Maritime Single Window (NMSW) the documents foreseen in the Convention on Facilitation of International Maritime Traffic (FAL) and Directive 2010/65/EU.

3. Restrictions of Ships Operations

Taking into consideration the epidemiological facts, the exponential increase of COVID 19 outbreaks in some countries and the need to prevent further expansion, the Greek government decided:

(a) to temporarily restrict for one month (until 15 of April), the movement of passengers by ships to and from Greece to Italy, Turkey & Albania. The measure does not affect trade operations, as long as freight transport including through trucks and lorries will continue to operate without restrictions,

(b) for the same public health reasons, to temporarily suspend calls at Greek ports of: (i) professional tourist vessels (cruise vessels, professional yachts, daily tour cruise ships, recreational



ships classified as a professional subject to laws applicable in another country), until 15 of April, **(ii)** incoming private recreational vessels, until 19 of April and **(iii)** private and professional tourist vessels, operating/ being within Greek territory, until 21.04.2020.

(c) to temporarily restrict the transportation of passengers by ships (including RO-ROs, Ro-PAXs, ferries and sea taxi) operating from the mainland of Greece to the islands and between the islands of the country until 21.04.2020 (passenger maritime cabotage). The measure does not affect transportation of: **(i)** the permanent residents of the islands moving from/to the islands to the mainland/ other islands, **(ii)** Armed and Security Forces personnel, as well as personnel involved in the operations of the European Border and Coast Guard & Civil Protection personnel moving for reasons related to their service, **(iii)** public sector officials, **(iv)** medical and nursing staff of the public and private sectors; health professionals and practitioners as well as the staff of the National Organization of Public Health and **(v)** persons moving for officially certified emergency reasons.

(d) to temporary ban the entry into the country of third-country nationals, including by air, sea, rail and road, until 18.04.2020. The measure does not affect trade operations, EU citizens, diplomatic missions' representatives, truck drivers and third country nationals who are permanent residents at an EU country. Seafarers who are third-country nationals or their companies are advised to contact the Greek Consular Authority in their place of residence requesting exceptional entry in Greece for professional purposes, with the necessary documentation (Seafarer ID, Seamens' Book, professional certificates CoC – CoP and/or the Standard EU *Template of Certificate for International Transport Workers* which can be found [here \(Annex 3\)](#), duly filled in by the shipowner or operator of the ship.

4. Seafarers Health Issues

The basic document used for the health status of the crew is the Maritime Declaration of Health under FAL and the NMSW. Coordination with the Health authorities (both locally in ports and at central/governmental level) is taking place. Crew members having symptoms or suspecting they are infected must follow regular quarantine or isolation routines established by the international and national Public Health Authorities. For detailed info on the existing guidelines for preserving seafarers' health in the context of the COVID-19 outbreak, click [here](#).

5. Inspection, Certification and Liability

A. As regards the conduct of surveys, audits and **inspections of ships**, in cases where surveyors, auditors and/or inspectors are not able to undertake due to restrictions imposed by COVID-19 countermeasures, the Hellenic Maritime Administration is preparing an appropriate regulatory provision to be incorporated in the national legislation in order to grant reasonable time-wise extension to the required surveys/audits and validity of the expiring statutory certificates and/or documents with regard to maritime safety & security, protection of the marine environment and maritime labour. In all cases, safety of navigation, which rests primarily to the ship operator and the master, will be ensured. Queries can be addressed to the Ships' Design and Construction Directorate (e-mail dmk@yen.gr, tel: +30 213 137 1951), Ships' Inspection Directorate (dep@hcg.gr, tel: +30 213 137 1957), Verification of Safety and Security Management of Ships and Port Facilities Directorate (dedaple@hcg.gr, tel: +30 213 137 1904, as regards ISPS/ISM), Regulations and Control of Organizations Directorate (dkeo@hcg.gr,



tel.+30 213 137 1878) and Director's office of General Directorate for Ships' Control (dkc@hcg.gr, tel.+30 213 137 1959).

With regard, specifically, to the conduct of ISM-ISPS renewal audits on boards ships that cannot be carried out in a timely manner, due to difficulties arising from the current COVID-19 pandemic, an extension to the appropriate certificates, may be given, up to three (03) months, in accordance with the paragraph 13.14 in conjunction with paragraph 13.12 of the ISM Code and additionally paragraph 19.3.5 in conjunction with paragraph 19.3.2.1 of the ISPS Code, provided that all the other requirements of the ISM Code and the ISPS Code are respectively met. Verification of Safety and Security Management of Ships and Port Facilities Directorate (DEDAPLE) should be informed at the same time accordingly with all the required documentation.

Furthermore, the annual ISM internal audits as referred in paragraph 12.1 of the ISM Code may be postponed for 3 months, in cases where audits cannot be carried out due to travel restrictions imposed by COVID19. The ship owner shall notify the RO or DEDAPLE in case they make use of the above-mentioned provision.

Similarly, annual internal audits under the ISPS Code may also be postponed for 3 months with notification to the RSO as above. All cases shall be reported afterwards by the ROs and sent to DEDAPLE (dedaple@hcg.gr, tel. +30 213 137 1904).

Any queries regarding the obligations, as set out in the pertinent bilateral agreements, of the Authorized Recognized Organization against the Maritime Administration should be submitted to Directive of Regulations and Control of Organizations Directorate (e-mail dkeo@hcg.gr tel: +30 213 137 1878)

In addition, the Administration has imposed temporarily a restriction to the transportation of passengers by ships (including RO-PAXs, High Speed Crafts, and RO-ROs) taking into account that one passenger is permitted in each 10 square meters of enclosed public space and one passenger or crew member in each cabin.

For all issues that fall under the jurisdiction of Ships' Inspection Directorate requests must be submitted electronically to the following dedicated email addresses of the Directorate:

- Construction and accommodation inspections' unit : eke@hcg.gr, tel +30 213 137 1853
- Marine Equipment unit : mareq@hcg.gr, tel:+30 213 137 1879
- Mechanical-Electrical surveys and small vessels unit: mems@hcg.gr, tel: +30 213 137 1849
- Coordination and issuance of certificates unit: sep@hcg.gr, tel:+30 213 137 1810
- Ships' archives unit: sep@hcg.gr, tel: +30 213 137 1810

Particularly:

- for issuance of Ship's Station Radio License

1. The procedure and the required documentation for issuing the ship's station radio licence are described in Circular No. 2333.12-5/11293/2017/13-02-2017 (ΑΔΑ: 7Μ4Λ4653ΠΩ-8ΨΨ) of the Hellenic Administration.



2. All inquiries and applications with the required documentation to be submitted in scanned - electronic form in the e-mail: mareq@hcg.gr. An acknowledgment of receipt will be sent within two working days.

3. The applicant is informed through e-mail when the new ship station radio licence is ready in order to schedule an appointment with an officer of the Marine Equipment unit to receive it in hard copy.

➤ for issuance of Ship's Permit to Operate (HSC/DSC)

1. All queries and applications with the required documentation to be submitted in scanned - electronic form in the e-mail: sep@hcg.gr. An acknowledgment of receipt will be sent within two working days.

2. The applicant is informed through e-mail when the new Permit to Operate licence is ready in order to schedule an appointment with an officer of the Coordination and issuance of certificates unit to receive it in hard copy.

Entry into the premises will be allowed only to individuals that have scheduled appointments with officers of the Ships' Inspection Directorate.

All services related to the above units will continue to be executed.

Queries after office hours are dealt by 24/7 officer in charge (email: kep@hcg.gr phone: +30 210 419 1800).

B. Extension of seafarers' certificates issued under STCW 78 and have expired or are due to expire on 30/05/2020 and their five-year renewal requires successful refresh/update courses, may be considered for a period of six (06) months, without having to undergo the said course. For all STCW certificates the Administration is preparing an appropriate regulatory provision with a view to ensure the smooth operation of shipping. The Hellenic Maritime Administration continues for emergency reasons to accept applications for the issuance and revalidation of certificates and will process them as far as possible. Any relevant queries to be submitted to the Seafarers' Training Directorate (e-mail dekn@hcg.gr, tel: +30 213 137 1439, +30 210 452 1032 - 1082).

C. Any queries arising to **IMO liability Conventions** and related certification, upon presentation of a valid blue card, can be submitted as follows: **(i)** for the CLC and the Bunkers Convention, to the local HCG branch or to the Marine Environment Protection Directorate (e-mail dipthap@hcg.gr – tel. +30 213 137 1304) and **(ii)** for the Athens Convention (PAL), to the local HCG branch or to the Directorate for Shipping (e-mail: dpn@hcg.gr – tel. +30 213 137 4616).

6. Extension of Sea Service Beyond the Seafarer Employment Agreement (SEA) – Seafarers Repatriation Issues

The Hellenic Maritime Administration has been made aware of cases where stringent border control measures for reducing the spread of COVID-19, have resulted in operators having difficulty in arranging crew changes and repatriating seafarers on expiration of their SEAs. Repatriation of seafarers onboard foreign flagged vessels calling at greek ports is subject to the restrictions of entry into the country and under the control of health authorities. However, the Maritime Administration has requested the competent authorities to facilitate the entry of seafarers as essential workers, irrespective of nationality, at border crossing points.



The Hellenic Maritime Administration also allows for the extension of SEAs provided that such extension is under the seafarer's consent and that all the relative arrangements by the shipowner/operator for repatriation will be undertaken as appropriate at the next available port as soon as conditions allow. The pertinent circular is available here.

Shipowners, Managers and Operators who require such an extension are to submit details of the seafarer/s including the details of the current agreement periods to the following email address of the Seafarers' Labour Directorate dner@hcg.gr, tel. +30 213 137 1108-1442-4217. Difficulties of seafarers' repatriation can be referred to the local consular authority of Greece and/or to the Seafarer's Labour Directorate.

7. Safety of Navigation – Port State Control Issues

VTS operation has not been affected. The SSN NCA 24/7 is operating normally.

National contact point concerning Port State Control Inspections carried out in Greece according to Paris MoU and EU Directive 2009/16 is the Unit D of Safety Navigation Directorate (dan.d@hcg.gr).

PSC inspections, excluding periodicals, are carried out based on judgement whether the conduct of the inspection would create a risk to the safety of the inspectors, the ship, its crew or the port and taking into consideration the relevant instructions from the Health Authorities. For cases of suspicion or reported Covid 19 incident, the possibilities under Art 8(2)(a) of Directive 2009/16 have been recalled to PSC inspectors.

8. Greek Register - Shipping companies

In the current COVID-19 situation, it is possible to submit requests for ship registration at the Ministry Ship Registration Unit ('Art. 13' ocean going vessels – dpn.d@hcg.gr, tel. +30 213 137 1248) or the local Hellenic Coast Guard Branches, following prior phone contact with the local registrar.

Queries or requests regarding Shipping Companies can be addressed to the competent Unit by phone (+30 213 137 4280 – 4285 – 1392 - 4528) or e-mail: dpn.b@hcg.gr. Most requests are satisfied through e-correspondence.

**HELLENIC COAST GUARD
1ST DEPUTY COMMANDANT**

**VICE ADMIRAL (HCG)
KONSTANTINOS POULIS**

