

---

4 ALBERT EMBANKMENT  
LONDON SE1 7SR  
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

Circular Letter No.4254/Add.3  
22 May 2020

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

Subject: **Communication from the Government of the Republic of India**

The Government of the Republic of India has sent the attached communication, dated 21 May 2020, with the request that it is circulated by the Organization.

\*\*\*





भारत सरकार / GOVERNMENT OF INDIA  
पोत परिवहन मंत्रालय / MINISTRY OF SHIPPING

नौवहन महानिदेशालय, मुंबई  
DIRECTORATE GENERAL OF SHIPPING, MUMBAI

DG Shipping Order No. 13 of 2020

NO: ENG/Misc-29(73)/09	Dated: 21 <sup>st</sup> May 2020
<b>Subject:</b> Extension to the validity of Seafarer's Certificates and Ship's Statutory Certificates, periodical Surveys & Audits in view of COVID-19 pandemic.	

1. The Directorate General of Shipping, as a proactive measure, issued *DGS Order No. 6 of 2020* on 23<sup>rd</sup> March 2020, wherein it has laid down the process of extension of mandatory surveys, inspections and audits by a period of three months, issuance of exemptions from Safe Manning requirements, and has granted extension to the validity of Certificates of Competency/Proficiency/Recognition of Equivalence (COC / COP / COE) for a period of one month without application for all those seafarers who are sailing on ships, under "Force Majeure", brought about by COVID-19 pandemic.
2. Whereas, vide the aforesaid order, the Directorate General of Shipping (DGS) has also waived off the processing fees for such extensions, except for cases pertaining to extension of dry-docking survey / periodical / annual / renewal surveys and that the said order was valid for a period of one month from date of issue.
3. Whereas, at the request of Indian National Ship Owner Association (INSA) and Indian Coastal Ship Owner Association (ICSSA) and after taking a pragmatic view of the situation, the DGS had issued on 4<sup>th</sup> April 2020 an *Addendum No. 1 to DGS Order 6 of 2020*, granted extension of six months to the validity of COC / COP / COE which are expiring between 23<sup>rd</sup> March 2020 and 1<sup>st</sup> October 2020, without application and irrespective of whether the seafarer was sailing or not.
4. Noting that lockdown has prevented the Surveyors and servicing personnel of the Recognized Organizations and service suppliers to board vessels to carry out Statutory Surveys and mandatory servicing of life-saving & fire-fighting appliances respectively and that non-completion of the same can lead to unsafe condition of the ship and possible detention of ships at various ports world-wide, due to non-conduct of mandatory surveys / servicing in a time bound manner as required under various International Conventions.

Page 1 of 5



5. Noting further that majority of International Conventions do not allow extension of Statutory Surveys beyond a certain specific period, Directorate devised a procedure for such extensions and same was issued on 21<sup>st</sup> April 2020 as an *Addendum No. 2 to DGS Order 6 of 2020* and allowed extension of survey/ audits/ inspections by a period beyond what is permitted by various IMO Conventions and also waived of applicable processing fees for such extensions due to continuing lockdown period and non-availability of servicing / repairing facilities arising out of COVID-19 pandemic.
6. The aforesaid waiver of processing fees was applicable to only those ships, where survey/inspection/audit are falling due on or before 31<sup>st</sup> May 2020. The grant of extension was subject to receipt of satisfactory recommendation of the Recognized Organization (RO) after having done a review of documents and past survey and inspection records apart from prescription of additional conditions to be observed by ship staff / shore staff.
7. Noting that seafarer who have signed-off prior to start of lock-down due to expiry of their Certificates of Competency/Proficiency/Recognition of Equivalence may not have got enough opportunity to revalidate their certificates due to continuing lock-down.
8. Noting further that the present circumstances has imposed additional responsibility on shipping companies and crew on board with regard to increased self-regulation on safety and security of ships, when no third or second-party inspection/audit report is available to assess the condition of ship as there is no visit being undertaken by Surveyor/Superintendent/PSC or FSI Inspector.
9. Noting also that many ROs have now commenced survey/audit/inspections, at ports where possible due to eased lock down at these ports. Also noting that still more time may be required for conduct of such surveys/audits/inspections at majority of Indian and Foreign ports due to continuing lock-down and gradual restoration of normalcy, there is thus a need to consolidate and review the procedures issued so far on the issue of extensions to the seafarer's certificates and ship's statutory certifications.
10. Taking cognizance of all the above and the prevailing circumstances the Directorate hereby, extends the continuation of provisions related to extensions and waiver of processing fees and extension of surveys/audits/inspections, beyond what is permitted by various IMO Conventions, only for those ships, where survey/inspection/audit are falling due on or before **30<sup>th</sup> June 2020**.
11. The application of above shall be in accordance with revised procedures as stated in the following paragraphs which is a consolidation and revision of the requirements / provisions on the same subject issued so far due to changed circumstances and thus this order supersedes the *DGS Order No. 6 of 2020 and its Addendums issued earlier*.



12. The revised procedure for extension of Statutory Certificates are as below:

i) **Extension of Annual/Periodical Surveys and Initial/Intermediate/Renewal Inspections/Audits by three months:** Since no extension of annual/periodical surveys are permitted under the Conventions, the Company shall make all efforts to ensure Surveyor of the Recognized Organization boards the vessel to conduct surveys/inspections/audits prior to expiry date. In case servicing suppliers are not available, such surveys can be kept part held pending completion of same and accordingly recommend for extension. In case the RO Surveyor cannot board the vessel, RO to recommend the same for extension based on Master/CE/DPA declaration and verification of past survey/inspection history records. Though the extension may be granted for 3 months, the RO and Company shall monitor and ensure that at first available opportunity the Surveyor of RO boards the vessel and completes the survey/inspection/audit.

ii) **Extension of Renewal/Docking Surveys beyond Convention allowed period:** Company shall make all efforts to ensure RO Surveyor boards the vessel for progressing with the renewal surveys as far as possible and carrying out a general examination, examination of Cargo Holds in case of Single Hull Bulk Carriers for extension of renewal surveys beyond 3months of expiry date and examination of Double Bottom Tanks and underwater examination for extension of Docking Survey beyond 36months period since last docking. Usual procedures for extension to be applied when extension requested is within what is permissible under the Convention.

When extension is granted without a Surveyor visit (based only on review of past survey/inspection record, Master/CE declaration and RO recommendation), as soon as the RO Surveyor is ready to board the vessel, company will offer the vessel for completion of surveys as far as possible and a general examination for remaining items and Under Water CCTV Examination (only in cases where Docking Survey is extended) and Double Bottom Tank examination (all cases of renewal surveys) and Cargo hold examination (in the case of single hull Bulk Carriers renewal surveys). Continuation of extension will be subject to satisfactory results of these examinations by RO Surveyor.

iii) **Exemptions from Safe Manning Document:** Where the Ship owners/Operators/Managers need to sign-off a crew member from a vessel due to the port restrictions at some ports and travel restrictions and the Ship owners/Operator/Manager is unable to place a reliever, exemptions to Safe



Manning Documents will be considered on a case by case basis. Each request should be supported by risk assessment from the company. There will be no fees charged for these exemptions and exemptions will be issued on email.

13. 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) Enhanced monitoring of ship by shore staff to ensure safety and security of ship and seafarer during this period of extension. Procedure for such monitoring to be developed and approved by DPA (for ISM/DDOC vessels) and records to be maintained for verification at next audit/FSI.

14. **Extension of Seafarer Certificate of Competency/Proficiency/Recognition of Equivalence (COC / COP / COE):** All STCW Certificates (*includes the training certificates i.e., certificates required under Chapter VI of the STCW*) and associated endorsements issued by the Directorate General of Shipping (DGS) which are expiring between **1<sup>st</sup> March and 31<sup>st</sup> December 2020** (both dates inclusive), shall stand extended for a period of 6 (six) months from the expiry date printed/typed on the relevant certificate (COC/COP/COE), irrespective of whether the seafarer is/was on ship at the time of expiry or not. However, all those seafarers who meet the eligibility requirements for revalidation may make an application after the lifting of the lockdown period, to the Mercantile Marine Department for revalidation of their COC/COP/COE. Further, whenever the revalidation of the expired certificate is to be carried out, the new validity shall be issued for a period of five years from the original certificate expiry date.

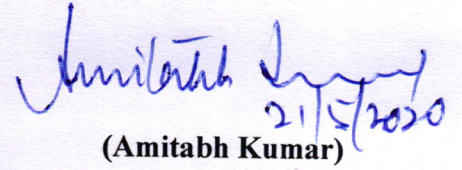
Notwithstanding above, the candidate's should not wait for the expiry of the extension period granted and should endeavour to get his COC revalidated after completing the online / offline courses, as applicable to their COC at the earliest opportunity.

15. After restoration of normalcy, it is the responsibility of the Company to bring back the ship to normal survey / audit cycle. For this the RO shall assist the company so as to ensure that these vessels are brought back to normal survey / audit / inspection cycle as soon as possible by keeping them posted regularly of their obligations.

16. ROs recommending for extension shall keep following records and update them weekly and submit the same to Directorate on a weekly basis:



- i) List of vessels and details of exemptions / extensions granted to Indian vessels on account of the situation developed due to COVID-19.
- ii) Details of such vessels offered for survey/audit/inspection after the lock down period and the status/records of such surveys /audits/inspections.

  
21/5/2020

(Amitabh Kumar)

**Director General of Shipping**

---