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CIRCULAR COVID19 - Comoros Guidance on the postponement and extension of statutory certification and services

Comoros Maritime Administration has released a Guidance relating to the postponement and extension of statutory certification and services.

[Notice to: Ship Owners/ Managers/ Operators | Surveyors/Auditors](#)

[C20040 | 24 September 2020](#)

The Administration taking into consideration the COVID19 outbreak and its delegation by the World Health Organization (WHO) as a pandemic, shall advise that it will be allowed as an exceptional measure as a response to the current worldwide lockdowns and travel restrictions, the postponement and/or extension of the statutory certification and of the surveys including ISM Code/ISPS Code audits and inspection related to MLC, 2006.

Recognized Organizations 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, the Comoros flag.

Annual services of life saving appliances and firefighting equipment expiring between September and November 2020, shall apply via vessel's Ros for extension of a maximum three (3) months period, submitting also an official statement by the Master of the ship that the equipment is in good operational condition.

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 the flag for further guidance.

All statutory certificates (except conditional certificates) expiring between September and November 2020 shall exceptionally be extended for a maximum three (3) months period, including DoC/SMS/ISSC/MLC and Exemption certificates, subject to RO's acceptance and in coordination with it.

The postponement/extension of the inspection of the outside's 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.

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, whose deadline was March 31, 2020;
- b. The issuance of the Statement of Compliance related to the ships fuel consumption data reports, whose deadline was 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, whose deadline was June 30, 2020.

The Administration will continue to evaluate the worldwide situation due to COVID19. Further extensions (re-extension) might be granted on a case by case basis and after thorough evaluation of the circumstances beyond the control of the operator, upon relevant evidence is provided.

Act now

Owners/ Managers/ Operators of Comoros flagged vessels should take into consideration above guidance in case extension of statutory certificates and postponement of surveys/audits might be required.