

Isle of Man Ship Registry Technical Advisory Notice



COVID-19 Advice to Ship Operators

Ref. 002-20
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1. Introduction

The Isle of Man Ship Registry wishes to provide updated guidance on disruption caused by COVID-19. The ongoing situation will continue to be monitored and the advice will be updated as required.

2. General Guidance

Information on COVID-19 relevant to the maritime industry can be found on the following websites:

[International Maritime Organisation](#)
[International Maritime Health Association](#)
[World Health Organisation](#)
[International Chamber of Shipping](#)

Specific guidance for ship operators for the protection of the health of seafarers is available in IMO Circular Letter No.4204(Add.4). Please note this circular letter is being regularly updated, the latest version is available on the [International Maritime Organisation's website](#).

3. Seafarer's Certification and Minimum Safe Manning

3.1 Seafarer's Certification

If the following documents are expiring or have expired and are unable to be renewed as a result of issues relating to COVID-19, the following course of action should be taken:

- a) STCW Certificate of Competency (CoC)
Seafarers are advised to contact their CoC issuing Authority requesting an extension to their existing CoC.
- b) Isle of Man (Flag State) Endorsement
The Ship Registry will issue a Flag State Endorsement to CoCs that have been extended by their CoC issuing Authority with the new expiry date as stated on the CoC. The application for the Endorsement should be submitted using the normal procedure stated in [MSN 051](#). The Ship Registry will waive the fee for the Endorsement if evidence is included with the application that the extension is as a result of issues related to COVID-19.
- c) Medical certificate
If a medical certificate expires whilst the seafarer is at sea, the certificate is allowed to remain in force until the next port of call where the seafarer can obtain a medical certificate from a qualified medical practitioner. This is permitted for up to 3 months. If a seafarer is urgently required to join a ship with an expired medical certificate, the Ship Registry must be contacted to request permission. The procedure for this is stated in [MLN 1.2](#).



3.2 Issues that affect the ship's Minimum Safe Manning Document (MSMD)

If a seafarer is unable to join a ship or has to leave a ship because of COVID-19 and this affects the ship's MSMD, the Ship Registry must be contacted to request permission to sail with fewer seafarers than stated in the MSMD. The Ship Registry will make an assessment of the vessel's manning levels and permission may be given for the ship to sail with a temporary dispensation from the minimum manning levels.

4. MLC Implications

4.1 Financial Security

Under the Maritime Labour Convention 2006, seafarers are required to have coverage for medical care (Standard 4.1), repatriation (Standard A2.5.2) and contractual claims for sickness and injury (Standard A.4.2.1). Shipowners are urged to check with their providers that their insurance or financial security covers seafarers for COVID-19 related issues and extend their coverage if necessary.

4.2 SEA Extensions

The Ship Registry is aware that travel restrictions related to COVID-19 are disrupting scheduled crew changes. In some cases, this has meant extending the SEAs of the current crew. Provided the following criteria are met, this course of action is acceptable and there is no requirement to contact the Ship Registry:

- The extension of the SEA is mutually agreed by the seafarer and shipowner;
- It is documented by way of a new SEA or addendum to the current SEA, signed by both parties; and
- The service period does not exceed 12 months (or any alternative limit prescribed by an applicable CBA)

If this service period will exceed 12 months (or any alternative limit prescribed by an applicable CBA), then the Ship Registry should be contacted.

4.3 Quarantine/Self-isolation

All seafarers should follow the guidance from the relevant health authorities concerning quarantine and self-isolation. If this occurs whilst the seafarer is in the service of the ship, it shall count as part of their service period.

5. Survey & Certification

The following section applies to disruption caused to statutory surveys or audits as a result of COVID-19. This may be because an IOM or RO's surveyor is unable to attend a vessel due to travel restrictions or issues with the availability of dry-dock facilities.

5.1 Delay in RO Statutory Surveys/Audits

In the event that an RO is unable to undertake a statutory survey or audit, the RO concerned shall submit to the Ship Registry an application for the extension of surveys, inspections or audits and/or the validity of statutory certificates accompanied by a recommendation of the course of action to be followed. All reasonable requests will be looked on favourably and the issuance of short term certification will be authorised on a case-by-case basis.



5.2 Delay in Dry Docking

The Ship Registry will also look favourably on requests for the extension of a vessel's dry docking, or servicing of critical equipment as required under the respective IMO Conventions. In all cases such applications should be supported by the vessel's RO and shall include the reasons and evidence why the vessel is unable to comply. It is strongly advised that owners and managers submit such applications to the RO before the due date of the surveys/audits or expiry date of the statutory certificate in order to avoid port State control issues.

5.3 Delay in Isle of Man General Inspections (GIs)

Where a GI is due and an IOM surveyor is unable to attend, the Ship Registry will issue an exemption on a case-by-case basis with a suitable time scale.

5.4 Delay in IOM Statutory surveys on Large Commercial Yachts

This applies in cases where the Ship Registry undertakes statutory surveys on large yachts i.e. for ISPS, ISM, MLC and REG Yacht Code Compliance surveys.

The Company or yacht should continue to contact the Ship Registry in good time to request an attendance within the survey/audit window. If we are unable to attend we will look favourably at issuing short term certification on a case-by-case basis with a suitable time scale.

5.5 Internal ISM Audits

Companies should be aware that regulation 12.1 of the ISM Code allows up to 15 months between audits in exceptional circumstances. If a Company is unable to undertake internal ISM audits within this range date, the Company is to contact the Ship Registry with reasons why the internal audit cannot be completed. On a case-by-case basis, we will look favourably on issuing an agreement to extend the period beyond 15 months.

5.6 Isle of Man Ship Registry Pre-registration surveys

The Company shall advise the Ship Registry as soon as the date and location for the pre-registration survey is known and we will consider whether attendance is possible. If it is not, we will determine either that the pre-registration survey is postponed. Alternatively we will attend the vessel at a mutually agreed location, for an initial general inspection after the registration on a case-by-case basis.

Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from vessel to vessel. You should consider seeking independent legal advice if you are unsure of your own legal position.

