

	CIRCULAR 2020-001	
	DEPARTMENT OF MARINE SERVICES AND MERCHANT SHIPPING (ADOMS)	
	Novel Coronavirus (2019-nCoV)	Ref .

Addressees(s):

- **All ADOMS Recognized Organizations and Recognized Security Organizations**
- **Owners, Operators and Managers of Vessels under the Flag of Antigua and Barbuda**
- **All Vessels registered under the Flag of Antigua and Barbuda**

1. Scope

This Circular is to provide all ADOMS Clients and relevant Stakeholders with information and binding direction on the application of procedures due to port restrictions resulting from the outbreak of the COVID -19 virus.

2. Legal Basis

- Antigua and Barbuda Merchant Shipping Act (MSA) 2006 and adhering Regulations
- Individual Agreements on the Delegation of Authority by ADOMS to relevant Organizations

3. Summary / Excerpt

ADOMS will have to assist seafarers, shipowners, managers and crewing companies considering the difficulties in conducting crew changes, Certificates, surveys and internal/external audits due to port restrictions resulting from the outbreak of the COVID- 19 virus.

4. ADOMS Policy

Based on the above the following policies will now apply under these exceptional circumstances:

I. Crew change procedures

- a. Seafarers are permitted to continue being engaged under their particular employment agreement beyond 11 months, if arrangements are being made by the shipowner to repatriate the affected seafarer at the next port, which is suitable for a crew change; and
- b. Seafarers are permitted to continue to sail in their current capacity until the next port, which is suitable for a crew change even if the Antigua and Barbuda flag State endorsement has expired, provided that the issuing Authority of the seafarer's national CoC has been contacted and all efforts have been made to achieve an extension of the national CoC.
- c. With respect to I (b.) above, documentary evidence thereto (e.g. in form of e-mail conversation with the Authority in question) must be submitted via the online application system (IASS). Thereupon a provisional CRA can be issued that is valid for one month, and can be extended on a case-to-case basis

II. Expired Medical Certificates

- a. The Antigua and Barbuda medical certificate can be extended for up to 3 months or until new certificate can be issued, whichever comes first and can be extended on a case by case basis.
- b. For other cases seafarers can trade with an expired Medical Certificate for up to three months

III. Internal Audits

- a. In General for any Internal Audit, also an Initial or Annual ISM Audit, a three month time frame applies. For COVID-19 related cases no NCs need to be raised within this time frame, provided documentation within the vessel's ISM is made

- IV. **Interim Certification**
 - a. In General, both the ISM as well as the ISPS Code allow either the extension of an Interim Certificate or the issuance of a consecutive Interim Certificate for further six months beyond an existing expiry date.
 - b. The MLC Convention does not apply such regulations.
- V. **Renewal Audits/Surveys**
 - a. The SOLAS Convention as well as the adjacent Codes thereto allows the extension of a renewal survey for either a period of grace of 1 month or a three months extension in order to reach a port in which the vessel is to be surveyed. Any COVID-19 related restriction will be treated as a case where the ship is in a port where she cannot be surveyed and extension can be applied accordingly.
 - b. The MLC Convention does not apply such regulations.
- VI. **External Audits other than the above**
 - a. Annual or Intermediate Audits and Verifications have a time frame of *6 to 12 months* and cannot be extended.
 - b. This Maritime Administration's current policy on the extension of dry docking remains unaltered.
- VII. **Remote Audits**
 - a. ADOMS encourages the use of technical solutions that avoid certificates becoming invalid due to audits that cannot be conducted and a lack of convention references that allow a regular extension of e.g. company audits.
 - b. ADOMS will accept requests for remote audits which are confirmed by any of our Recognised Organisations

5. Further Information

a. How to proceed

If a ship is due for any of the above-mentioned external surveys, the survey request will be placed with the ship's respective Class, RO or RSO. These Organizations will endeavor to conduct the surveys or propose remote surveys for specific items. In case all efforts to conduct a survey fail, this Maritime Administration will be contacted by either the company or the organization and for ship's legible for any of the above-mentioned regulations, these will be applied.

Where none of these regulations apply this Maritime Administration may authorize the ship to sail to the next available port where the audit, or inspection can take place. Such authorization will be issued when requested and if port restrictions related to COVID-19 create unexpected and extraordinary circumstances beyond the control of the company of a vessel.

To receive a ship specific authorization letter from this Maritime Administration, the company will have to file an application supported by adequate documentation.

b. Safety Inspections by the Flag State

Owners / Companies are requested to remain in close contact with ADOMS IID to coordinate ASI / SSI / ISI. ADOMS IID will endeavor to conduct these and apply the necessary flexibility in both the choice for port of attendance and extension of time frames where required.

Kindly also refer to [information-notice-2020-002 \(Rev 1\) novel-coronavirus guidance](#) on our website