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Circular Letter No.4225
20 March 2020

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

Subject: **Communication from the Government of the Commonwealth of the Bahamas**

The Bahamas Maritime Authority sent the attached communication, dated 19 March 2020, with the request that it is circulated by the Organization.



The Bahamas
Maritime Authority

To: His Excellency Kitack Lim
Secretary General
International Maritime Organization
4 Albert Embankment
London SE1 7SR

19th March 2020

Secretary General,

Subject: The Bahamas Maritime Authority's measures in relation to COVID-19

Firstly we applaud and support your call for practical and pragmatic approach to ensure that the flow of commerce by sea is not be unnecessarily disrupted at this unprecedented time when ships and the seafarers serving onboard are a critical part of the solution to overcome the COVID-19 pandemic.

This is to inform you that The Bahamas Maritime Authority (BMA) has established Flag State guidance and recommendations for fleet under the Bahamas flag, in light of the current COVID-19 outbreak, which is a major global crisis affecting maritime transport.

Noting the invitation in IMO Circular Letter *No.4204/Add.5 (17 March 2020)*, the BMA would respectfully request that the Secretariat issues a Circular Letter to all Member States, NGO's and IGO's, for circulation of the enclosed ***BMA Technical Alert No 20-03 Novel Coronavirus***.

A copy of the latest version (*BMA Technical Alert No 20-03, version 3.6, 19/03/2020*) is enclosed for your reference and parties can obtain the most updated guidance from the BMA website : <https://www.bahamasmaritime.com/publications/technical-alerts/>

The BMA would like to thank you in advance for your effort and takes this opportunity to assure you of its highest cooperation.

Kind regards,

Dwain E. Hutchinson,
Managing Director & CEO.

Cc: His Excellency Ellison Greenslade,
Bahamas High Commissioner and Bahamas Permanent Representative to IMO

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COVID-19

1. Purpose

- 1.1. This Technical Alert is issued by the Bahamas Maritime Authority (BMA) to provide information on COVID-19 (formerly called novel coronavirus or 2019-nCoV).

2. Introduction

- 2.1. As widely reported, COVID-19 has been associated with an outbreak of pneumonia type illness and cases are being reported worldwide.
- 2.2. Coronaviruses (CoV) are a large family of viruses that cause illness ranging from the common cold to more severe diseases, such as, Middle East Respiratory Syndrome (MERS-CoV) and Severe Acute Respiratory Syndrome (SARS-CoV). These viruses are zoonotic, meaning that they are transmitted between animals and people. A novel coronavirus (nCoV) is a new strain which has not been previously identified in humans.
- 2.3. Common signs of infection with this virus include:
- respiratory symptoms,
 - fever,
 - cough,
 - shortness of breath and
 - breathing difficulties.
- 2.4. In more severe cases, infection can cause:
- pneumonia,
 - severe acute respiratory syndrome,
 - kidney failure and
 - even death.
- 2.5. Standard recommendations to prevent the spread of this infection include:
- regular proper hand washing,
 - covering mouth and nose when coughing and sneezing,
 - thoroughly cooking meat and eggs and
 - avoiding close contact with anyone showing symptoms of respiratory illness such as coughing and sneezing.

- 2.6. The World Health Organization (WHO) declared the COVID-19 outbreak an international pandemic (a worldwide occurrence of the virus) on 11 March 2020. The situation is evolving daily.
- 2.7. Owners/operators should ensure that standard recommendations to prevent the spread of infection are implemented on their ships.
- 2.8. Owners/operators should also ensure that they are aware of any local reporting requirements in their ships' areas of operation, in case of any crew members or passengers showing signs of infection.
- 2.9. Prior to entering ports identified as having been affected by the outbreak of COVID-19 owners/operators should make appropriate risk assessments and take appropriate measures.

3. Travel to The Bahamas

- 3.1. **As of 14 February 2020, any foreign nationals who have visited China, South Korea, Italy and Iran in the last 20 days will be denied entry into the country. From 19 March 2020 this will be extended to foreign nationals from the United Kingdom, Ireland and Europe.**
- 3.2. All residents returning to The Bahamas will be strictly quarantined and monitored for development of symptoms for the duration of the incubation period.

4. Travel to Other Countries

- 4.1. Numerous travel restrictions are being put in place.
- 4.2. Be diligent, pay attention and equip yourself with travel advisory information related to COVID-19 before you travel.
- 4.3. If during, or after your travel, symptoms of respiratory illness are experienced, you are encouraged to immediately contact a medical provider who will guide you as to your next steps. Be ready to give your full travel history to health care providers.

5. Actions to be taken in case of suspected cases

- 5.1. Where COVID-19 is suspected, medical advice should be sought.
- 5.2. The advice of public health authorities in the country where the ship is located when cases are suspected should be sought and any instructions followed.
- 5.3. Owners/operators are requested to report any suspected cases of COVID-19 to the BMA by email: casualty@bahamasmaritime.com.

6. Extensions, postponements, etc.

6.1. Seafarer Employment

- 6.1.1. In cases where crew members may have to exceed the 12 months or contractual period onboard as stated in their original Seafarers' Employment Agreement (SEA) because of travel restrictions imposed due to the outbreak of the corona virus, The Bahamas will consider such extensions to be *force majeure* and therefore not a breach of the Maritime Labour Convention, 2006, (MLC) as amended.
- 6.1.2. In such cases, an entry shall be made in the ship's Official Logbook describing the situation and listing the crew members who have had to extend their stay.
- 6.1.3. A new SEA shall be arranged for the crewmembers in question, and it shall be stated that the seafarers are entitled to repatriation at no cost to the seafarer at one week's notice.

6.2. Expired Medical Certificates

- 6.2.1. If a seafarer's medical certificate expires, the certificate can be extended for up to 3 months or until a new certificate can be issued, whatever comes first. Should this situation go beyond three months, further advice will be provided.

6.2.2. If a medical certificate expires, an entry is to be made in the Official Logbook with reasons why it is necessary to extend the certificate.

6.3. **Expired STCW Certificates**

6.3.1. If STCW certificates expire please contact the issuing State of the certificate for extension of Certificates of Competency (CoCs). BMA will endorse such extensions as necessary.

6.3.2. For Certificates of Proficiency (CoP's), please contact the BMA at stcw@bahamasmaritime.com.

6.3.3. Details of any expired STCW certificates are to be recorded in the Official Logbook.

6.4. **Seaman's Record Books**

6.4.1. The BMA is currently restricted in the use of courier and mail services to send seaman's record books to clients.

6.4.2. Where seafarers are not in possession of a Seaman's Record Book, the BMA requests that the Master issues a Record of Service as stipulated in paragraphs 3.3 and 3.4 of [BMA Information Bulletin No. 107](#).

6.4.3. Notwithstanding the above, the BMA will still issue Seaman's Record Books and clients are encouraged to apply online through the BORIS electronic system. When the Seaman's Record Book is issued the BMA will send an electronic copy to the client to be used onboard.

6.4.4. The BMA will send the original Seaman's Record Books by courier as normal when full access to courier services is available.

6.4.5. Sea service may be transferred to the Seaman's Record Book from the Record of Service either by the Master who signed the Record of Service or by the Company.

6.5. **Bahamas Initial, Annual and Pre-Registration Inspections**

6.5.1. BMA inspectors have been instructed not to put themselves at risk and likewise not to put ship's crews at risk - this means they will follow the guidance of the health authorities in the country where they are located and may decline to attend ships.

6.5.2. Where an initial or annual inspection cannot be carried out before the end of the inspection window, the owner/operator shall advise the BMA Inspections & Surveys department (tech@bahamasmaritime.com), providing full supporting information. Inspections should be carried out at the first port where an inspector is available.

6.5.3. The requirement for pre-registration inspections is waived for 3 months from 16 March 2020 for ships up to 20 years of age. Ships over 20 years of age will be considered on a case by case basis and inspection requirements will be advised by BMA. For ships over 12 years of age, a pre-purchase or condition report should be submitted where available.

6.5.4. Notwithstanding para 6.5.3, all ships proposed for registration, with the exception of new builds, remain subject to a pre-registration technical documentation review.

6.6. **Surveys**

6.6.1. Where a surveyor is not able to undertake scheduled surveys due to restrictions imposed by COVID-19, including cancellation of scheduled dry docking and/or bottom survey, and remote survey is not practicable, the BMA authorises its Recognised Organisations to consider applications for extension/postponement under *force majeure* or unforeseen exceptional circumstances and administratively issue short term statutory certificates for up to 3 months. This is to be followed up by a physical survey at the earliest opportunity.

6.6.2. For statutory surveys delegated to Bahamas Recognised Organisations, the Recognised Organisation shall consider the application, which should include full supporting information, prior to issuing short-term certification. The Master shall provide a statement to the Recognised Organisation confirming the structure or equipment to be surveyed remains fit for purpose and has not been subject to any damage.

6.6.3. Where the structure or equipment to be surveyed does not remain fit for purpose, or has suffered damage, or the Recognised Organisation does not support the application, the Recognised Organisation shall provide full details to the BMA. The BMA will consider on a case-by-case basis and provide instructions to the Recognised Organisation.

6.7. **ISM and ISPS Internal Audits**

6.7.1. Timely completion of ISM internal audits is amongst the most frequently reported difficulties. The BMA therefore temporarily permits extensions to annual ISM internal audits for up to 3 months, as per para 5.6 of [BMA Information Bulletin 23](#) and para 12.1 of the ISM Code, in cases where it is not physically possible to attend and remote audit is not practicable. This is to be followed up by a physical audit at the earliest opportunity.

6.7.2. The Company Security Officer may postpone internal ISPS audits for up to 3 months in cases where it is not physically possible to attend, and remote audit is not practicable. This is to be followed up by a physical audit at the earliest opportunity.

6.8. **ISM External Audits**

6.8.1. For interim ISM DOC and SMC audits where it is not physically possible to attend and remote audit is not practicable, the BMA may permit the issue of interim DOC/SMC upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that the safety management system is in place and meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.

6.8.2. For initial ISM DOC and SMC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim DOC/SMC for up to 6 months upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that the safety management system meets the objectives of paragraph 1.2.3 of the ISM Code. This is to be followed up by a physical audit at the earliest opportunity.

6.8.3. For SMC and DOC periodical audits, if these are not completed within the range date the certificate ceases to be valid as per ISM Code. In such circumstances, the Recognised Organisation may issue a new SMC or DOC valid for 3 months or until the audit can take place, whichever comes first.

6.8.4. For SMC and DOC renewal audits, and noting the provisions of ISM Code 13.14, the BMA authorises its Recognised Organisations to issue 3-month extensions, where requested by the Company, to existing SMC and DOC Certificates.

6.9. **ISPS External Audits**

6.9.1. For interim ISSC audits where it is not physically possible to attend and remote audit is not practicable, the BMA may permit the issue of an interim ISSC upon receipt by the Recognised Organisation of a statement from the Company Security Officer **AND** Ship Security Officer confirming that:

- i. A Ship Security Assessment has been completed.
- ii. A copy of the Ship Security Plan (SSP) is on board and there is evidence that the SSP has been submitted to the Recognised Organisation for approval.
- iii. the security measures identified in the Ship Security Plan are in place and the provisions of paragraph 19.4.2 of the ISPS Code have been met.

This is to be followed up by a physical audit at the earliest opportunity.

- 6.9.2. For initial ISSC audits where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim ISSC for up to 6 months upon receipt by the Recognised Organisation of a statement from the Company Security Officer **AND** Ship Security Officer, as per 6.9.1.i to iii.

This is to be followed up by a physical audit at the earliest opportunity.

- 6.9.3. For ISSC intermediate audits, if these are not completed within the range date the certificate ceases to be valid as per ISPS Code A19.3.8. In such circumstances, the Recognised Organisation may issue a new SMC or ISSC valid for 3 months or until the audit can take place, whichever comes first.

- 6.9.4. With regards to ISSC renewal audits, noting the provisions of ISPS Code A-19.3.5, the BMA authorises its Recognised Organisations to issue 3 month extensions, where requested by the Company, to existing ISSC Certificates.

6.10. **Maritime Labour Inspections**

- 6.10.1. For interim MLC inspections where it is not physically possible to attend and remote inspection is not practicable, the BMA permits the issue of an interim MLC for up to 6 months upon receipt by the Recognised Organisation of a statement from the Company/Master confirming that:

- i. the applicable requirements of MLC 2006 have been met.
- ii. An approved Declaration of Maritime Labour Compliance Part I is on board or evidence provided that it has been requested from the BMA.
- iii. DMLC Part II is available in draft or evidence provided that it has been submitted to the Recognised Organisation.

This is to be followed up by a physical audit at the earliest opportunity.

- 6.10.2. For initial MLC inspections where it is not physically possible to attend and remote audit is not practicable, the BMA permits the issue of a second interim MLC for up to 6 months upon receipt by the Recognised Organisation of a statement from the Company/Master, as per 6.10.1.i to iii.

This is to be followed up by a physical audit at the earliest opportunity.

- 6.10.3. MLC 2006 does not provide for the issue of extensions to existing MLC Certificates without inspection. However, in this exceptional situation, the BMA authorises its Recognised Organisations to administratively issue a short-term Maritime Labour Certificate for 3 months in cases where the renewal or intermediate inspection cannot be conducted due to COVID19 restrictions.

- 6.10.4. The Recognised Organisation shall state that the certificate has been issued to allow the ship to continue on its intended voyage and complete the inspection at the first port where inspectors are available. When the renewal or intermediate inspection has been completed a full-term Maritime Labour Certificate may be issued with its expiry date not later than 5 years from the expiry date of the original full-term Maritime Labour Certificate.
- 6.11. **Remote audits and surveys**
- 6.11.1. The BMA will consider requests for remote audits and surveys where supported by the Recognised Organisation.
- 6.12. The Recognised Organisation shall provide a weekly report to the BMA (by email to tech@bahamasmaritime.com) of actions taken under paragraphs 6.6 to 6.10. The weekly report should be submitted by 1730UTC on the Wednesday of the following week.
- 6.13. The temporary measures described in paragraphs 6.5 to 6.10 will remain in place for 3 months from 16 March 2020 and are subject to review as the situation develops.

7. Certificates and Documents

- 7.1. Hard copy certificates will continue to be provided by the BMA as usual, provided that postal/courier services remain in operation.
- 7.2. The BMA may issue scanned copies of hard copy certificates in order to ensure that ships have copies of current documents on board.
- 7.3. The validity of any certificate can be verified by contacting the BMA.

8. Further information

8.1. Bahamas Ministry of Health:

- i. [Home Page](#)

8.2. World Health Organization:

- i. [Rolling Updates](#)
- ii. [Information and Guidance on COVID-19](#)

8.3. International Maritime Organization:

- i. [Circular Letter No.4204 \(31 January 2020\)](#)
- ii. [Circular Letter No.4204/Add.1 \(19 February 2020\)](#)
- iii. [Circular Letter No.4204/Add.2 \(21 February 2020\)](#)
- iv. [Circular Letter No.4204/Add.3 \(02 March 2020\)](#)
- v. [Circular Letter No.4204/Add.4 \(05 March 2020\)](#)
- vi. [Circular Letter No.4204/Add.5 \(17 March 2020\)](#)

8.4. Further information is also available from a number of industry bodies, governmental and inter-governmental agencies.

9. Validity

9.1. This Technical Alert is valid until further notice.