



**International Association of Classification Societies**

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By Email Only

## **LETTER TO INDUSTRY ASSOCIATIONS**

Dear Industry Colleagues,

Over the past days, IACS has received many requests from interested parties seeking guidance on how its Members intend to respond to the current and forthcoming challenges posed by the Coronavirus (COVID-19) pandemic.

At the outset, let me assure that IACS Members understand and share your concerns as to the potential impact COVID-19 will have on international shipping both in the short and long term. To date, IACS Members have all been proactive in working with industry and flag States where operational decisions regarding, for example, measures to maintain validity of classification and statutory certificates, need to be made by the individual Class Society on a case-by-case basis.

IACS Members also recognise, however, that a consistency in approach between the various Class Societies is required and the Association has therefore established a COVID-19 Task Force to identify and assess measures that can be implemented in a coordinated fashion to help facilitate business continuity.

The purpose of IACS Procedural Requirements (PRs) is to provide consistency between the actions and approaches taken by IACS Members and the measures that have already been taken by IACS to address immediate concerns can be summarised as follows:

- PR1C has been used to ensure consistency in the application of 'force majeure' and exceptional circumstances' for class purposes by IACS Members.
- Also in PR1C are requirements related to carrying out surveys and maintaining the validity of certificates. IACS is developing a temporary amendment to Para. A.1.7 of PR1C which will provide a period of not exceeding three (3) months for the completion of surveys.
- IACS is working on amendments to PR1A which will facilitate the transfer of class by allowing the gaining Society, in coordination with the owner, to better plan the surveys in advance.
- IACS Members have taken a unanimous stand to the use of each other's exclusive surveyors where it would be impractical for one Society to attend but where a surveyor from another IACS Member Society could be utilised. This measure will also help avoid unnecessary travel in restricted areas which in turn supports the safety of the surveyor and vessel crew concerned

and the broader public health of the countries concerned. Provisions exist in PR5 and PR21<sup>1</sup> allowing these arrangements (subject to agreement with the RO's flag States). These provisions will be supplemented by the development of a standard request form that may be used by each IACS Member when seeking to utilize the exclusive surveyor from another IACS Classification Society.

- Noting the importance of keeping both surveyors and ship's crews safe when visiting vessels, IACS is developing specific health and safety guidance for surveyors to facilitate their access to sites/ships which will cover matters such as strict adherence to, and support of, site/ship security access controls along with site/ship health and safety measures; use of protective equipment, including masks, gloves, soap, hand-sanitizers and temperature monitors and up-to-date guidance on COVID19 prevention measures.

In addition to these immediate actions, please note that an IACS COVID-19 Task Force has been recently established to answer a number of questions recently received. The list of detailed queries raised with IACS and relevant specific responses is annexed to this letter and the IACS COVID19 Task Force will continue to work on them.

In terms of action at the regulatory level, IACS has welcomed the positive and proactive action undertaken by IMO including the issuance of IMO Circular letters calling for understanding and close cooperation among all Member States and Port States to overcome challenges related to the implementation and enforcement of the relevant IMO instruments.

IACS is pleased to note that flag States have recognised the challenge and are addressing it within the statutory regime, and supports the measures taken to date by IMO. IACS co-sponsored a submission to IMO ([MSC 102/7/5](#)) seeking a unified interpretation of SOLAS regulation II-1/3-10 concerning the term "unforeseen delay in the delivery of ships".<sup>2</sup>

IACS is also engaging with flag States with a view to working with maritime Administrations to assist in addressing the issuance of statutory certificates beyond the 3 month window of a short term certificate, possibly via the development of technical parameters and/or a risk based approach that can underpin the decision making process and identify any associated checks that need to be put in place during that period.

Finally, IACS has established a dedicated webpage (<http://iacs.org.uk/covid-19/>) which will be regularly updated as the COVID19 Task Force continues its work, including updates to the Annex table to this letter.

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<sup>1</sup> PR5, section 1: "... An exclusive surveyor of one Classification Society may also be regarded as an exclusive surveyor to another Classification Society in those cases where the relevant Societies have agreed to share survey resources"; and

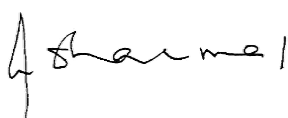
PR21, section 3: "For the purpose of this Procedural Requirement, use of properly qualified, exclusive surveyors employed by other Classification societies is limited to exceptional and duly justified cases and is subject to the discretion of the flag Administration".

<sup>2</sup> Following the postponement of MSC 102, the IMO Secretariat has issued Circular letter [No.4204/Add.7](#) highlighting existing instruments that may be used to address the issues raised in paper [MSC 102/7/5](#).

IACS is committed to supporting the maritime industry through the unprecedented challenges posed by the COVID19 pandemic. Through a close and constant dialogue with all stakeholders, we are confident that appropriate mechanisms can be put in place that meet the needs of the shipping industry while ensuring that the safety of the ships, their crews and the marine environment remains uncompromised.

IACS looks forward to working with the industry, flag States and regulators during these exceptional circumstances and to playing its part in keeping the shipping industry moving.

Yours faithfully,

A handwritten signature in black ink that reads "Arun Sharma". The signature is written in a cursive, flowing style.

Arun Sharma  
IACS Chairman

## ANNEX 1

### SPECIFIC ISSUES WHERE IACS' INPUT HAS BEEN SOUGHT AND INITIAL RESPONSES

No.	Issue	Suggestion from Industry	IACS RESPONSE
1	CREDITING OF ANNUAL SURVEYS	EXTEND WINDOW TO - 6/+6 MONTHS. APPLY REMOTE SURVEY TECHNIQUES. IF SURVEYS ARE TO BE CREDITED EARLY LEAVE MINOR ITEMS TO BE CREDITED REMOTELY IN ORDER NOT TO DISRUPT THE EXISTING SURVEY CYCLES.	<i>Although the existing +/- 3 months period is included in IMO and IACS documentation, in the case of Force Majeure the survey may be part held and postponed remotely where the Flag will permit a corresponding extension to validity of statutory certificates. The remote survey associated with the Force Majeure will use information supplied from onboard the vessel to be confirmed by an authorised surveyor remotely to postpone the annual survey for up to an additional 3 months.</i>
2	INTERMEDIATE SURVEYS	SAME AS ABOVE	<i>The intermediate survey window spans a period of 18 months. In the case of force majeure, the requirements of the intermediate survey can be postponed remotely through the same process as the Annual Survey above, where the Flag will permit a corresponding extension to validity of statutory certificates, but with additional confirmation required related to the age, type and condition of the vessel on a case by case basis, to be confirmed remotely based on information provided from the vessel.</i>
3	SPECIAL / DOCKING SURVEYS	GRANT EXTENSIONS OF 3 + 3 MONTHS	<i>Societies may already grants an extension of up to 3 months to the Special Survey and Docking survey end of range in exceptional circumstances. Members may consider further postponement of the Special Survey and Docking by an additional 3 months under force majeure where Flag Administration agrees, and information provided from the vessel to enable remote examination of the vessel to be performed by an authorised surveyor.</i>
4	DOCKING SURVEYS	ACCEPT AN UNDERWATER SURVEY FOR SHIPS OVER 15 YEARS OF AGE.	<i>Societies may grant extensions and may grant further extension subject to information being provided to enable a surveyor to examine the vessel's underwater parts remotely.</i>

5	RADIO SURVEYS	POSTPONE RADIO TECHNICIAN ATTENDANCE BASED ON A DECLARATION ISSUED BY THE MASTER THAT ALL THE RADIO EQUIPMENT IS OPERATING	<i>Flag Administrations have taken differing positions on postponements of surveys and extension of certificates. Societies will support the request to flags for extensions and postponements where necessary.</i>
6	OUTSTANDING RECOMMENDATIONS (Conditions of Class)	GRANT EXTENSIONS AND/OR APPLY REMOTE SURVEY TECHNIQUES	<i>Societies have been granting extensions and revising conditions of class where appropriate remotely for many years. Societies may update and revise the procedures for their surveyors to make this easier and clearer.</i>
7	EQUIPMENT SURVEYS SUCH AS BOILERS ETC.	EXTEND WINDOWS TO +6 MONTHS BASED ON INFORMATION PROVIDED BY CHIEF ENGINEERS.	<i>Boiler surveys require to be done 2 times in 5 years, with the period between them not to exceed 36 months. Societies may grant an extension up to 3 months to the Boiler and Docking survey end of range in exceptional circumstances. Members may consider further postponement of the Boiler Survey by an additional 3 months under force majeure where Flag Administration agrees, and information provided from the vessel to enable remote examination of the vessel to be performed by an authorised surveyor.</i>
8	CONTINUOUS MACHINERY	ACCEPT CREDITING BY THE CHIEF ENGINEERS BASED ON THE SUBMISSION OF ADEQUATE BACKGROUND INFORMATION.	<i>Machinery surveys conducted by the chief engineer can be credited for CSM as part of a Machinery Planned Maintenance System Class notation where it is present. Where no such notation is present then the Society may consider postponement of individual CSM items based on supporting information from the Chief Engineer.</i>
9	CALIBRATION OF EQUIPMENT	ACCEPT CALIBRATION BY THE CREW OF THE SHIPS AND APPLY REMOTE SURVEY TECHNIQUES	<i>Societies may support the use of calibration performed on the vessel by the ship's staff in accordance with the manufacturers' instructions where permitted by the respective flag.</i>
10	LSA/FSA	ACCEPT CREDITING BY THE CREW OF THE SHIPS.	<i>Flag Administrations have stated positions on servicing of equipment which requires to be carried out by trained personnel. Societies may support the servicing performed on the vessel by competent ship's staff in accordance with the manufacturers' instructions where permitted by the respective flag.</i>
11	ISM / ISPS / MLC SURVEYS	APPLY REMOTE SURVEY TECHNIQUES	<i>Societies may have issued instructions for carrying out audits remotely, of both office and ship using approaches and measures agreed with the Flag Administration.</i>
12	STCW	ALREADY DEALT WITH (SEE IMO CIRCULAR LETTER No. 4204/Add.5 dated 17MAR2020).	<i>Noted.</i>

13	LACK OF LOCAL SURVEYORS	ACCEPT SURVEYS BY THE SURVEYORS OF OTHER IACS MEMBERS OR NON EXCLUSIVE SURVEYORS	<p><i>Where surveyors are not available then options for remote survey or force majeure extensions will be considered. If this is not possible, then the IACS Procedural Requirements, in line with the EC Regulations, make provision for the use of exclusive surveyors to other IACS Members and EU Recognised Organisations in exceptional and duly justified cases; for statutory surveys this can only be done with Flag agreement.</i></p> <p><i>IACS is working towards arrangements to consistently apply these provisions during this period.</i></p>
14	PREPARATION FOR SURVEYS	PROVIDE PREPARATORY INSTRUCTIONS SO THAT THE TIME SURVEYORS SPEND ONBOARD IS MINIMIZED.	<p><i>IACS supports such proposals. The local office for the relevant Society can be contacted for advice on survey preparation.</i></p>
15	IHM SURVEYS	DONE REMOTELY SUBJECT TO AN EXTENDED SURVEY DURING FIRST ANNUAL.	<p><i>The initial desktop review may be performed remotely and followed up by onboard verification at a later date, subject to Flag Administration approval.</i></p>

**Disclaimer:** The Suggestions from Industry and IACS responses, to address the issues in implementing surveys, audits and inspections in accordance with the international instruments, are common views of Members but they are not intended to be binding on IACS Member Societies and do not constitute a binding commitment with respect to the implementation of a Society’s delegated authorities as recognized organizations of the flag States. The final decision with regard to necessary responses is the discretion of each Member Society in consideration of the individual circumstances as well as instructions from the regulators.