05 June 2020

MARINE ADVISORY: 21/2020

Subject: Guidance to Assist with Impact of Coronavirus Disease 2019 (COVID-19) on Crew Documentation

Dear Shipowner/Operator/Masters/Verifiers:

The purpose of this Marine Advisory is to provide guidance, pursuant to Marine Advisory 07/2020, to assist Shipowners, Operators, and Master that may be experiencing cases of Crew serving aboard with expired certificates and endorsements, and those serving in excess of their Seafarer Employment Agreement periods, due to the COVID-19 Pandemic and restrictions. This has specifically arisen due to the decreased ability to conduct crew changes globally.

Shipowners and Operators who are or may be experiencing difficulties should contact the Administration immediately for assistance.

1. The Administration shall permit agreements by seafarers to continue being engaged under their seafarers’ employment agreements beyond a period of 11 months due to restrictions placed on vessels by port authorities due to the COVID-19.

The Administration will authorize seafarers to continue being engaged under their seafarers’ employment agreement beyond 11 months. See paragraph 3.5.4 of Marine Notice MLC-003, issued by the Administration. This allows a seafarer to postpone his/her annual leave and continue to be engaged beyond the 11 months, provided:

A. Both the seafarer and shipowner agree for seafarer to forego annual leave, if the period of engagement on board will exceed 11 months;

B. A proper risk assessment is carried out by the shipowner considering the ship’s trading pattern, rest hours, and fatigue and other identified hazards. The Administration will issue a letter to the shipowner agreeing to seafarers to be engaged under their seafarers’ employment agreements beyond a period of 11 months, taking into account arrangements made by the shipowner to repatriate seafarers as soon as possible at the next available port.

Contact: mlc@liscr.com if this authorization is needed.
2. The Administration authorizes a seafarer to continue service on board a ship when their Certificate of Competency (COC) issued by their national Administration has expired, and they are not permitted by the Port Authorities to depart due to COVID-19.

A. This Administration primarily issues endorsements of National COC’s and COP’s. In the scenario above, the Country issuing the seafarer’s national COC’s, COP’s and Medical Examination Certificates should be contacted and asked to issue an extension of the national certificates. When Liberia receives the extension request we will issue an endorsement in the form of a special CRA. It will be valid for 90 days unless limited to a lesser length of time by the National Administrations extension. If after 90 days there needs to be a longer extension (and the National Administration has issued a longer extension) we will issue another special CRA.

If the National Government has not issued their extension length we may, on a case by case basis, issue a short-term special dispensation (in the form of a special CRA) allowing the seafarer to continue to sail in their present capacity until the vessel reaches the first port where he/she can be replaced and repatriated. Liberia cannot extend the validity of an endorsement if the issuing National Administration has not allowed an extension to their certificates.

Seafarers whose documents expire should have their National Documents, a copy of the National Administrations extension and Liberia’s special CRA to show Port State Control Regimes. Contact dmuir@liscr.com; kcope@liscr.com and nbowley@liscr.com if the special CRA is needed, so these requests can be processed urgently.

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