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THE REPUBLIC OF LIBERIA

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Marine Advisory: 22/2026

Subject: AMSA Marine Notice - Invalid Extensions of Statutory Certification

References

- a) [AMSA Marine Notice, Invalid extensions of Statutory Certification, updated 28 August 2026.](#)
- b) SOLAS 1974, as amended, Chapter I, regulation 14.
- c) [IMO Resolution A.1207\(34\), Survey Guidelines under the HSSC, 2025.](#)
- d) [IMO Circular MSC-MEPC.5/Circ.1, Guidance on extension of the validity of certificates.](#)
- e) [IMO Resolution A.1206\(34\), Procedures for Port State Control, 2025.](#)

Purpose

This Marine Advisory informs shipowners, operators, Masters, and Recognized Organizations of the Australian Maritime Safety Authority (AMSA) position on statutory certificate extensions granted or used contrary to applicable Convention and Code requirements. It provides practical measures for Liberian-flagged vessels trading to Australia and for companies requesting or relying on such extensions.

AMSA Marine Notice states that a vessel found with statutory certification extended contrary to Convention or Code requirements may be detained during a port State control inspection. Any current or proposed extension affecting a vessel calling at an Australian port should therefore be reviewed immediately.

Applicability

This Marine Advisory applies to:

- All Liberian-flagged vessels;
- Shipowners, operators, and managers;
- Masters and senior officers;
- Recognized Organizations acting on behalf of the Administration; and
- Vessels trading to or intending to trade to Australian ports while relying on an extension of statutory certification.

Regulatory Background

International conventions permit limited extensions of statutory certificates only where the relevant Convention, Annex, Article, or Code expressly authorizes an extension and all prescribed conditions are satisfied.

For SOLAS certificates, SOLAS Chapter I, regulation 14(e) and 14(f) address extensions in specific circumstances. IMO Circular MSC-MEPC.5/Circ.1 contains guidance on certificate extensions.

The Survey Guidelines under the Harmonized System of Survey and Certification, 2025, adopted by IMO Resolution A.1207(34), explain when an extension may be considered proper and reasonable.

AMSA emphasizes a direct voyage to a named final cargo discharge port and then directly to a named port where the required survey and/or dry-docking will be completed. The maximum period permitted by a Convention is not an automatic entitlement to continue routine commercial trading for that entire period. The extension must remain connected to its statutory purpose and be limited to the period reasonably necessary in the particular circumstances.

AMSA Findings and Enforcement Position

AMSA reports that port State control officers have encountered ships with certificates extended under SOLAS Chapter I, regulation 14(e) or 14(f), but which continued or intended to continue commercial trading rather than proceeding directly to the agreed cargo discharge and/or survey port. AMSA also identifies extensions exceeding the minimum time needed to complete the survey, including cases where dry-docking remained due.

Where AMSA considers that certification has been extended contrary to a Convention or Code, the vessel may be detained. If the extension was issued by the flag State's Recognized Organization, AMSA states that the Recognized Organization may be held responsible for the detention. A detained vessel may be permitted to sail to the survey port under the IMO Procedures for Port State Control, 2025, as amended.

Administration Position

The Liberian Administration reminds all concerned that an extension is an exceptional statutory mechanism, not a substitute for timely survey planning, dry-docking, repair, or certificate renewal. Each request will be evaluated on its individual facts and strictly against the enabling Convention or Code provision.

Commercial inconvenience, charter commitments, cargo schedules, berth availability, or a desire to preserve trading flexibility do not, by themselves, establish that an extension is proper and reasonable. Owners and operators must plan statutory surveys sufficiently in advance and must not structure a trading program around the maximum theoretical extension period ([Marine Advisory 28/2022-Rev.1](#)).

IMPORTANT: An extension does not authorize unrestricted commercial trading until the extended expiry date. The vessel must comply with every condition in the authorization and the underlying Convention or Code provision.

Required Actions by Shipowners and Operators

- Review every current and proposed extension before a vessel calls at an Australian port.
- Confirm the exact Convention, Annex, Article, regulation, or Code provision authorizing the extension.
- Ensure the authorization identifies the certificate, approved period, reason, named final cargo discharge port where applicable, named survey or dry-docking port, and all conditions.
- Arrange the itinerary strictly in accordance with the authorized voyage. Refer any deviation or additional commercial employment to the Administration before it occurs.
- Use only the minimum period reasonably necessary to reach the agreed port and complete the survey and/or dry-docking.
- Keep the Administration and Recognized Organization informed of changes affecting the approved basis, schedule, port, route, vessel condition, or survey arrangements.
- Carry onboard the authorization, relevant correspondence, confirmed survey and dry-dock bookings,

voyage plan, and evidence supporting the need and duration.

- Brief the Master and responsible officers. Ensure chartering instructions and onboard records are consistent with the authorization.
- Immediately notify the Administration if the extension can no longer be followed as approved. Do not assume it remains valid after a material change.

Guidance to Masters

Before arrival at an Australian port, the Master should verify that:

- The original certificate and extension authorization are onboard, valid, legible, and consistent;
- Authorized routes, ports, dates, and conditions match the actual voyage and instructions;
- The vessel is proceeding with the named cargo discharge and/or survey port as authorized;
- No additional commercial voyage, cargo operation, or route deviation has been introduced outside the approved basis;
- Survey and dry-docking arrangements are confirmed, and documentary evidence is available;
- All imposed conditions and risk-control measures are implemented and recorded;
- The company has provided a clear explanation and organized evidence for Port State Control; and
- Any discrepancy is reported before arrival.

Guidance to Recognized Organizations

- Confirm the extension is expressly permitted by the applicable Convention or Code and within delegated authority.
- Document why it is proper and reasonable, including necessity, minimum period, and intended voyage.
- Do not issue an extension merely for administrative convenience or routine commercial trading.
- State all voyage and operational conditions clearly and provide copies to the vessel, company, and Administration.
- Escalate doubtful, unusual, or changed circumstances to the Administration.
- Confirm realistic survey attendance and dry-docking arrangements aligned with the approved period.

Information Required for an Extension Request

- Vessel name, IMO number, affected certificate, current expiry date, and requested date;
- Exact legal basis under the applicable Convention or Code;
- Detailed reasons for the survey or dry-docking cannot be completed before expiry;
- Present port, final cargo discharge port, survey/dry-docking port, and complete voyage sequence;
- Estimated sailing and arrival dates supported by the shortest practicable itinerary;
- Written confirmation of surveyor attendance and/or dry-dock booking;
- Vessel condition and all outstanding deficiencies, recommendations, conditions of class, or repairs;
- Risk-control measures and proposed operational limitations; and
- Confirmation that no additional commercial trading is planned beyond the authorized voyage.

Consequences of non-compliance

A vessel arriving in Australia with an extension that AMSA considers contrary to Convention or Code requirements may be subject to expanded port State control inspection and detention. Companies should treat any inconsistency between the approved extension and the actual voyage as an immediate compliance issue.

If you have any questions, please contact our Fleet Performance Department by Telephone: +1-703-790-3434 or by email to prevention@liscr.com.