



**Ministry of Infrastructure and Transport
Italian Coast Guard Headquarters**

Department VI
Safety of Navigation and Maritime Security

Subject: COVID-19 Measures

The repercussions of the COVID-19 pandemic continue to have a significant impact on global trade and the global shipping industry.

In Italy, the Government implemented preventive measures in its fight to contain the spread of COVID-19.

The outbreak and subsequent measures have led to disruptions in regular shipping operations, including the standard requirements for the renewal of seafarers' and ships' certificates pursuant to the relevant IMO instruments.

Consequently, and in accordance with the FAL Convention (article V point 2), the Italian Coast Guard Headquarters (ITCG HQs) has undertaken the following initiatives:

A. STCW Convention – Certification for seafarers

Certificate of Proficiency (COP):

The provisions of the Manila Amendments state that in order to renew the certification required by Chapter VI of the STCW Convention, it is compulsory to attend the following refresher courses:

- Basic Training Regulation VI/1 and corresponding Section A-VI/1 points 2, 3 and 4;
- Survival Craft and Rescue Boat Regulation VI/2.1 and corresponding Section A-VI/2 points 5 and 6;
- Fast Rescue Boat Regulations VI/2.2 and corresponding Section A-VI/2 points 11 and 12;
- Advanced fire-fighting - Regulation VI/3 and corresponding Section A- VI/3 points 5 and 6.

In order to prevent the spread of COVID-19 and adhering to preventative measures, the Certificate of Proficiencies (CoPs) relating to the above-mentioned training courses have been extended with the following conditions:

- a. Extensions are limited to 6 months;
- b. Extensions are granted only to seafarers with adequate experience who have already served in that position and:
 - are serving on board with certification expiring during the course of their employment; or
 - are due to embark and are in possession of expired certificates.

The above was forwarded to IMO with the aim of publication and communication to all Member States (Attachment 1).

Training and qualification of personnel on passenger ships (Regulation V/2 STCW):

The validity of the documentary evidence of the training has been extended for six months.

B. MLC, 2006 – Regulation 1.2 - Standard A1.2

The Ministry of Health extended the validity of the medical certification for 3 months. The ITCG HQs stated that the conditions required by MLC, 2006 Standard A1.2 paragraph 8 should be applied.

C. MLC, 2006 – Maritime Labour Certificate and inspections

On 7th April 2020, the “*International Labour Organization*” released the “*Information note on maritime labour issues and coronavirus (COVID-19)*” by which some flexibility has been accepted.

In this regard and having consulted the National Competent Authority, the ITCG HQs is proceeding - on a case by case approach - to:

- a. extend – evaluating the application submitted - the validity of the “Maritime Labour Certificate” for 3 months;
- b. dispense – any single ship for any specific voyage - from the prohibition on forgoing annual leave under Standard A2.4, paragraph 3, of the MLC,2006 providing that the Shipowner produces the following evidences:
 - seafarer’s consent to remain on board 3 months beyond the default 11-month maximum period of service established by MLC,2006 demonstrated by the SEA signed by the parties;
 - Master’s statement assuring that the danger caused by the fatigue of seafarers, especially those whose duties involve navigational safety and the safe and secure operation of the ship will be taken into account;
 - Voyage plan proving that the ship is bound for a COVID-19 area;
 - Amendments to the relevant parts of the Declaration of Maritime Labour Compliance – Part II;
 - Company declaration stating how the rights of the crew are protected and assured in light of the extended stay on board and what plan the shipowner has established in order to assure the repatriation of the crew in an expeditious manner.

D. Ship’s certification

The surveys/inspections related to the issuing or endorsing of the statutory certificates have been regulated by Circular letters 4/2020, 5/2020, 10/2020, 16/2020 and 19/2020 (Italian language published on web page <http://www.guardiacostiera.gov.it/normativa-e-documentazione/Pages/circolari.aspx>)

The ITCG HQs has been facing difficulties in carrying out its usual activities and in carrying out the processes of verifying and certifying ships.

In particular, ships are in many cases no longer in the position to be inspected and surveyed on-site and the ITCG HQs is therefore granting the extension of the statutory certification as follow:

SOLAS: extension of 3 months in application of SOLAS amendments 1988, Regulation I/14 letter (e) (HSSC):

- a. Directive 2009/45/CE: Passenger ship safety certificate validity is extended for a period up to three months applying mutatis mutandis the provisions contained in SOLAS 1988 Amend / Chapter I (HSSC) / Reg. 14 (e) for the duration of the emergency period as per instruction received by the European Commission;
- b. Directive 2017/2110/EU: Pre-commencement and regular inspections not carried out within the established time window are “justified” applying mutatis mutandis the provisions contained in Directive 2009/16/EC Art. 8 – 2.a) and 3.c).
- c. Italian Presidential Decree 435/91: extension until 31 December 2020 in accordance with the Law 24 April 2020, No. 27 article 103-bis.

Consequently, once the period of grace elapses, the ITCG HQs will return to normal on-site survey procedures but whether it will be not possible, due to COVID-19 restrictions, it has been planned to:

- carry out remote survey/inspection techniques; and
- issue a short-term certificate with validity limited to 12 (twelve) months.

The above approach and intention have been forwarded to IMO with the aim of publication and communication to all Member States (Attachment 2).

E. Bottom dry-docking surveys

Ships' companies are facing criticism related in particular to a sharp slowdown of ships going into dry-dock and, in some cases, the banning of ships' access.

Consequently, ships are no longer in the position to start the dry-dock survey by the time required by SOLAS Regulation I/10(a)(v), although it has been demonstrated that the dry-dock was scheduled well in advance.

In this regard, the ITCG HQs decided that, in cases of justified impossibility for the ship to enter dry-dock, the in dry-dock bottom ship's inspection can be postponed subject to the satisfactory result of an in-water bottom survey.

In light of the ongoing emergency situation, this is the approach the ITCG HQs will continue to take until 30th June 2020.

The above:

- have been regulated by Circular letter 9/2020 (Italian language published on web page <http://www.guardiacostiera.gov.it/normativa-e-documentazione/Pages/circolari.aspx>); and
- was forwarded to IMO with the aim of publication and communication to all Member States (Attachment 3).

F. Periodic services performed by external companies.

Statutory verification and certification processes that are related also to activities to be performed by the external companies can be categorized in three macro-areas:

1. verification overseen by National, Union or International law to be completed within 3 months before or after each anniversary date;
2. repair, test and or verification following damages, equipment and system failure, detention etc.;
3. services different from those referred to in points 1. and 2. required by the Recognized Organization (RO) or in application of instructions provided by equipment's manufacturer.

Considering the above, the following instructions were delivered:

- As regards the activities referred in point 1., the extension of the relevant certifications' validity has been extended also to all related services;
- As regards the activities referred in point 2., if the RO confirms the good working condition of the concerned equipment, the ships' RO will issue a specific "deficiency card" with a maximum validity of 3 (three) months;
- The services referred to in paragraph 3., which are not covered by the specific rules set out in paragraphs 1 and 2, will be managed through specific instructions to be issued by the RO or the maker.

The above have been regulated by Circular letter 6/2020 (Italian language published on web page <http://www.guardiacostiera.gov.it/normativa-e-documentazione/Pages/circolari.aspx>)

G. Periodic inspection to service stations (liferafts, lifejackets, MES and hydrostatic release units)

The biennial inspections, to be held from 1st March to 30th September 2020, have been postponed until 31st October 2020. The validity of the existing approval decrees is therefore confirmed.

H. Manufacturing and servicing of Life-Saving Appliances (LSA).

The ITCG HQs - as outlined under the Decrees issued by Government of the Republic of Italy in the context of the COVID-19 pandemic – considers that the staff of all Life-Saving Appliance Original Equipment Manufacturers (OME) and Approved Service Providers, who are directly involved in manufacturing and servicing, should be considered as key workers and permitted to continue to working during this period in order to carry out the required and essential service work related to life-saving appliances and arrangements.

I. Conformity assessment procedures carried out by Notified Bodies under the directive 2014/90/EU (Marine Equipment Directive – MED) for the certification of marine equipment.

1. The Covid-19 restrictions implemented and enforced by the responsible Authorities had also an important impact in the regular conduct of the conformity assessment activities to be carried out by the Notified Bodies in the framework of the directive 2014/90/EU transposed with legislative decree n. 53/2011.

In order to administer the current situation, with Circular n. 14/2020 ITCG HQs – as lead Administration for the subject matter and in consultation with the various Administrations involved in the process with regard to marine equipment under examination – established that Notified Bodies can postpone periodical audits or the validity of existing Modules D or E up to a maximum of 3-months based on no changes in the applicable requirements supporting the aforesaid certificates.

After this period:

- case 1. If a postponement of the periodical audit was applied, Notified Bodies shall carry out the verification on-site – or, if not possible due to exceptional circumstances – remotely in compliance with a specific procedure developed by Italy after consultation with the involved Bodies.

- Case 2. If an extension of the validity was applied, Notified Bodies shall carry out the renewal of concerned certificates on site (expiry date will be in line with MarED Approved Recommendation (AR) GEN 006 Rev. 19) – or, if not possible due to exceptional circumstances – remotely (expiry date will not exceed 12-months).

Notified Bodies shall be committed to keep appropriate records of all activities addressed under the afore mentioned Circular.

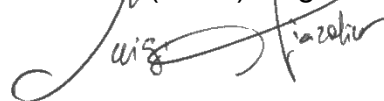
2. In addition, pursuant to instructions disseminated by the European Commission, DG for Internal Market, Industry, Entrepreneurship and SMEs with e-mail on March 19th, 2020 to face the exceptional circumstances related to the outbreak and spillover of Covid-19, on May 2020 ITCG HQs – as lead Administration responsible for the coordination of the activities leading to the authorization of Bodies engaged in the conformity assessment procedures under the captioned directive – requested the Notifying Authority of the State (Ministry of economic development) to introduce an update on the notification in NANDO, providing for a 3-months extension of the validity of the notification with an indication that reassessment will be performed as soon as the restriction due to the Covid-19 will be relaxed. For the time being, that application is under evaluation of the aforesaid Authority. Involved Notified Bodies were duly informed accordingly.

J. Refresher courses of personnel operating in the field of dangerous goods.

According to Italian legislation, a refresher course related to the requirement of Chapter 1.3 of IMDG Code has to be attended periodically. In order to prevent the spread of COVID-19, the certification related to the training mentioned above, expiring within 30th June 2020, have been extended until 30th September 2020.

Rome, 17th May 2020

THE HEAD OF THE DEPARTMENT
Rear Admiral (ITCG) Luigi GIARDINO





**Ministry of Infrastructures and
Transport**

*Italian Coast Guard Headquarters
Safety of Navigation and
Maritime Security Department*

Rome, 20th March 2020
(p.o.c. Rear Admiral (ITCG) Luigi GIARDINO
e-mail: segreteria.reparto5@mit.gov.it)

HE Mr. Kitack Lim
Secretary General of
International Maritime Organization

Subject: Measures to Address Covid-19.

Dear Secretary-General Lim,

The Italian Coast Guard Headquarters presents its compliments and has the honour to confirm receipt of the Circular letter No. 4204/Add.5 dated 17th March 2020.

In its fight to contain the spread of COVID-19, the Government of Italy has declared a state of emergency and has been forced to exercise strict measures - one of which, inter alia, has been to close all seafarers' training centers in Italy that are recognized and controlled by the Italian Coast Guard.

The provisions of the Manila Amendments state that in order to renew the certification required by Chapter VI of the STCW Convention, it is compulsory to attend the following refresher courses:

- ◆ Basic Training Regulation VI/1 and corresponding Section A-VI/1 points 2, 3 and 4;
- ◆ Survival Craft and Rescue Boat Regulation VI/2.1 and corresponding Section A-VII/2 points 5 and 6;
- ◆ Fast Rescue Boat Regulations VI/2.2 and corresponding Section A-VI/2 points 11 and 12;
- ◆ Advanced fire-fighting - Regulation VI/3 and corresponding Section A- VI/3 points 5 and 6.

In this regard, in order to prevent the spread of COVID-19 and properly address it, the CoPs relating to the above-mentioned training courses have been extended with the following conditions:

- a. Extensions are limited to 6 months;
- b. Extensions are granted only to seafarers with adequate experience who have already served in that position and:
 - are serving on board with certification expiring during the course of their employment; or
 - are due to embark and are in possession of expired certificates.

We would therefore like to ask the Secretariat to kindly have this information regarding the extension of the CoPs communicated to all Member States of the IMO. Your valuable attention to this matter is very much appreciated.

The Italian Coast Guard avails itself of this opportunity to renew the assurances of its highest consideration.

**The General Commander
Vice Admiral (ITCG) Giovanni PETTORINO**

Firmato Digitalmente da/Signed by:
GIOVANNI PETTORINO

In Data/On Date:
venerdì 20 marzo 2020 11:57:38

Rome, 15 May 2020
(p.o.c. Rear Admiral (ITCG) Luigi GIARDINO
e-mail: segreteria.reparto8@mit.gov.it)



**Ministry of Infrastructures and
Transport**

*Italian Coast Guard Headquarters
Safety of Navigation and
Maritime Security Department*

HE Mr. Kitack Lim
Secretary General of
International Maritime Organization

Subject: Measures to Address Covid-19.

Dear Secretary-General Lim,

Unprecedented and unexpected developments brought about by the rapid spread of coronavirus (COVID-19) are having a major impact on the health of the world's population.

For this reason, governments have been implementing measures to limit the spread of Covid-19, *inter alia*, by denying travel or by imposing 14 days of quarantine.

In its efforts to abide by these restrictions, the Italian Coast Guard Headquarters has been facing difficulties in carrying out its usual activities and in carrying out the processes of verifying and certifying ships.

In particular, ships are in many cases no longer in the position to be inspected and surveyed on-site and the Italian Coast Guard Headquarters is therefore granting the extension of the statutory certification in application of the relevant conventions.

Consequently, once the period of grace elapses, the Italian Coast Guard will return to normal on-site survey procedures. If this is not possible we will:

- Carry out remote survey/inspection techniques; and
- Issue a short-term certificate with validity limited to 12 (twelve) months.

We would like to ask the Secretariat to kindly disseminate this information regarding the ship's certification to all Member States of the IMO.

Your valuable attention to this matter would be very much appreciated.

The Italian Coast Guard takes this opportunity to renew the assurances of its highest consideration.

**The General Commander
Vice Admiral (ITCG) Giovanni PETTORINO**

Firmato digitalmente da

GIOVANNI PETTORINO

CN - PETTORINO GIOVANNI
Q - Ministero delle Infrastrutture e dei
Trasporti
C - IT



**Ministry of Infrastructures and
Transport**

*Italian Coast Guard Headquarters
Safety of Navigation and
Maritime Security Department*

Rome, 23rd March 2020
(p.o.c. Rear Admiral (ITCG) Luigi GIARDINO
e-mail: segreteria.reparto6@mit.gov.it)

HE Mr. Kitack Lim
Secretary General of
International Maritime Organization

Subject: Measures to Address Covid-19.

Dear Secretary-General Lim,

Stringent restrictions have been implemented by the Coastal States as a result of the coronavirus outbreak. In its efforts to abide by these restrictions, the Italian Coast Guard Headquarters is facing criticism related in particular to a sharp slowdown of ships going into dry-dock and, in some cases, the banning of ships' access.

Consequently, ships are no longer in the position to start the dry-dock survey by the time required by SOLAS Regulation I/10(a)(v), although it has been demonstrated that the dry-dock was scheduled well in advance.

In adapting to these changes and in order to ensure the ships' safety, the Italian Coast Guard has introduced measures to verify – within the time period established by the current rules - the condition of the bottom of the ships flying the Italian flag.

In particular, in cases of justified impossibility for the ship enter dry-dock, it has been decided that the in dry - dock bottom ship's inspection can be postponed subject to the satisfactory result of an in-water bottom survey. In light of the ongoing emergency situation, this is the approach we will continue to take until 30th June 2020.

We would therefore like to ask the Secretariat to kindly have this information regarding the postponement of the required bottom dry-dock inspection circulated to all Member States of the IMO.

Your valuable attention to this matter is very much appreciated.

The Italian Coast Guard avails itself of this opportunity to renew the assurances of its highest consideration.

**The General Commander
Vice Admiral (ITCG) Giovanni PETTORINO**
Firmato digitalmente da

GIOVANNI PETTORINO

CN = PETTORINO GIOVANNI
O = Ministero delle Infrastrutture e dei Trasporti
C = IT