



CIRCULAR MCO – 003-2020

DATE: JUNE 20TH, 2020
FROM: MCO HEAD OFFICE – TECHNICAL DEPARTMENT
TO: SURVEYORS / MANagements/OWNERS/OPERATORS
SUBJECT: VARIOUS TECHNICAL TOPICS

Dear All:

We have been receiving several questions regarding below subjects and we hope to address all of your concerns in trough this circular, if not please feel free to contact us at depto_tecnico@macosnar.com

1. Extension for the issuance of Statement of Compliance (SOC) as required by the IMO – DCS under MARPOL, Annex I, Regulation 22A.

As you may be aware, as of March 31st, 2020 all vessels of 5,000 GRT and above should have complied with the collection and reporting of data regarding fuel oil consumption for the period covering from January 1st, 2019 to December 31st, 2019. This data shall be submitted to approved verifiers and apply for the issuance of a Statement of Compliance (SOC) which must be on board no later than May 31st, 2020 (see PMA's MMC-365).

In this subject the Panama Maritime Authority has communicated to the IMO's Secretary General its decision to extend the above dates (March 31st, 2020 for the data collection and May 31st, 2020 for the issuance of a SOC) **for three months**. Please find attached the communication sent to IMO HQ.

However, we strongly recommend that you submit the collected data as soon as possible in order to avoid any delays. MCO is approved to verify this data and to apply for the issuance of the correspondent SOC's before PMA.

2. Remote Surveys due to the Covid-19 Pandemic

At the moment Macosnar Corporation is not carrying out remote surveys for the issuance and/or endorsement of statutory certificates. Instead, the validity of FT and Interim certificates is being extended for three months. The same goes for annual, periodical and intermediate surveys. When the situation regarding the pandemic normalizes, all postponed surveys and audits shall be carried out with the presence of the surveyor as usual.

All of the above based on the instructions provided in MMN 007-2020, issued by PMA.

It is understood that MCO knowing that the future of surveys may be going in the direction of remote surveys, is working on instructions and procedures to carry

out this types of surveys initially for certain Class related issues (occasional surveys, damage surveys, conditions of class, etc.) as for statutory surveys, we will wait until the Administration provides the clear initial guidelines as to when, where and how are this remote surveys will be accepted.

3. Implementation of The Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships.

Macosnar Corporation is currently working on the procedures and survey instructions for the implementation of HKC. Currently PMA is authorizing the issuance of a voluntary statement of compliance if requested by the owner or operator of the ship, since The Convention has not entered into force. In the meantime, we invite to get prepared by familiarizing your company's and ships personnel with the following IMO literature on the subject:

- ✓ 2011 Guidelines for the Development of the Ship Recycling Plan, adopted by resolution MEPC.196(62);
- ✓ 2012 Guidelines for Safe and Environmentally Sound Ship Recycling, adopted by resolution MEPC.210(63);
- ✓ 2012 Guidelines for the Authorization of Ship Recycling Facilities, adopted by resolution MEPC.211(63); and
- ✓ 2015 Guidelines for the development of the Inventory of the Hazardous Materials, adopted by resolution MEPC.269(68)

As for the EU Ship Recycling Regulation we invite you to go through the following guideline:

[IMS EMSA Guidance - Europa EU](#)

www.emsa.europa.eu > [emsa-documents](#) > [download](#)

4. Submission of issued Interim/Conditional/Endorsed Full Terms Statutory Certificates, reports and supporting documents:

At last we would like to reiterate the below:

It has come to the attention of the MCO's Technical Department that the documents mentioned above, are taking way too long to reach the HO for review, approval and/or submission to PMA. Although it is clear that our procedure states that the surveyor has 90 days to submit this documentation, MCO Technical Department has noticed that, is becoming a common practice to receive this documents five or even six months later after the survey is completed. In the case of an interim certificate, this immediately causes a Non Conformity within our procedures and if we have to submit this documents to PMA for the issuance of a Full Term Certificate (IBWMC, ISSC, CSSC 500, RTC 300, etc.) this will immediately cause a delay for the shipowner, a breakdown on the regular provision of services of MCO and furthermore a Mal Practice report may be issued by PMA which for sure will affect the responsible surveyor, directly.

In the case of annual surveys, the documentation is taking even longer to reach the MCO HO. We have noticed documents with almost a year of delay. This, again causes an immediate Non Conformity and furthermore should the vessel be detained or is involved in an incident we will not have time to maneuver in order to resolve whatever situation arises without major complications.

We sincerely hope and trust, that we can count with your kind cooperation for the above.

Should you have any further questions, please do not hesitate to contact us.

Best Regards,

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