



Date: 15th of September 2020

Circular no.: 0046C/TG/09/20

SUBJECT: Ship-owners / Operators / Managers, Representatives of Togo flagged vessels, Deputy Registrars, Masters, Flag, and Port State Control Surveyors and Recognized Organizations.

Subject: Remote Surveys, Audits, and Inspections, procedures applied by the International Ship Registry of Togo (I.S.R. Togo) due to the global COVID-19 pandemic.

References:

1. IACS Recommendation No. 42 – Guidelines for Use of Remote Inspection Techniques for surveys (Rev.2 June 2016).
2. International Registry of Togo Circular No. 0039C/TG/03/20 of 24 March 2020 – Extension of the validity of Ships certificates and seafarers due to the COVID-19 problem.
3. IMO Circular Letter No.4204/Add.19, 2 June 2020, Coronavirus (COVID-19) – Guidance for flag States regarding surveys and renewals of certificates during the COVID-19 pandemic

1. Purpose

1.1. The purpose of this circular is to inform all interested parties that Recognized Organizations (Ros) by this Administration, having established relevant corporate procedures and guidelines for remote surveys, audits, and inspections, can be authorized to conduct them on board Togo flagged vessels.

The coronavirus (COVID-19) pandemic has caused disruptions to the provision of normal shipping services, including the conduct of surveys. The new circular completes also the above 2 circular in reference, providing extensions up to 3 months on the survey dates for ships under the Togo flag, due to the global COVID-19 pandemic situation and the traveling restrictions in place. In exceptionally justified cases and subject to the prevailing conditions following this Administration review, it may grant a supplemental extension of an additional period of 2 more months (3+2).

2. Background

The shipping industry is currently facing an unprecedented challenge of maintaining the flow of international trade during the COVID-19 crisis. Shipowners, Operators, Masters, and Recognized Organizations are experiencing difficulty in conducting operations, due to the COVID-19. These difficulties include restricted access to shipyards and ports for inspectors, auditors, surveyors, and crews, which could result in delays in conducting statutory surveys, audits, inspections, crew changes, etc., to maintain the validity of certificates and compliance with regulations.

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The International Ship Registry of Togo has carefully considered these restrictions which would affect the conduct of surveys so that the survey and certification regime can continue to operate as normal, ships can comply with the relevant mandatory requirements and the I.S.R. of Togo can adhere to its obligations under treaties. To ensure operational continuity, it is vital the flexibility and adjustment of our procedures in a way to protect human life and to ensure the continuity of operations efficiently. Remote inspection technology(R.I.T) facilitates the normal operation of a fleet by making vessel inspection accessible during a time when travel of all interested parties is near impossible. To apply technology to the shipping industry, at this time more than ever, proves to be essential in inspecting ships remotely. During these challenging times caused by COVID-19 digital technologies ensure that Class-RO services are delivered without disruptions, without compromising the safety of crew and surveyors.

3. Definitions

3.1. Remote Surveys: is a method of obtaining information equivalent to that obtained from survey on site, by applying digitals and technological systems, in an efficient and secure manner, to carry out survey without surveyor's presence on board ships.

3.2. Remote inspection techniques means/methods to conduct remote surveys. According to IACS Rec.42 1996/Rev.2 2016 "includes the use of divers, unmanned robot arm, remote operates vehicles (ROV), climbers, drones. Other means used by Recognized Organizations to conduct remote surveys are also accepted by this Administration. By using an online connection or video streaming link, a dedicated team of remote surveyors can provide support to vessels anywhere in the world with documentation, images, video (streaming or recordings), and input provided by the customer and crew onboard.

4. Application

4.1. Remote Surveys may be applied to all commercial vessels registered in International Ship Registry of Togo, as an alternative to survey on-site, employing remote inspection techniques by the crew or ship-designated person, to provide the survey results necessary to the RO appointed surveyor, for the correspondent evaluation. The survey can be carried out wherever the ship is located and to ensure compliance with the applicable international requirements. The prevailing principle is to make sure that ships remain subject to the mandatory statutory and classification regime of surveys and certification as far as possible.

4.2. The remote inspection techniques may comprise of the following:

- Unmanned Robotic Arm
- Remote Operated Vehicles (ROV)
- Unmanned Aircraft System (UAS)
- Other means acceptable to the Administration.

5. Instructions to Recognized Organizations

5.1. Every Recognized Organization by this Administration is responsible to determine if the ship applying for the remote survey is eligible for the inspection, considering the scope and suitable conditions to perform such work.

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5.2. Having considered the technological capabilities and procedures developed by the Recognized Organizations to execute Remote Surveys, the I.S.R. of Togo authorizes them to carry out the following surveys, including, but not limited to:

- Follow up verification / occasional surveys - audit
- IWS(In Water Survey)
- Verification of minor deficiencies rectification
- Interim ISM/ISPS/MLC Audits
- Annual Surveys
- Surveys on account of change of owners/ change of ship name
- Radio Surveys
- IHM (Inventory of Hazardous Materials) Surveys

5.3. It is noted that during these challenging times caused by COVID-19 an **extension period for scheduled surveys is granted for three(3) months** with a possibility of extension for up to two(2) months upon a substantiated reason, in order not to affect the vessels survey periodicity cycle.

5.4. Remote Surveys, Audits, and Inspections not listed above will be evaluated on a case by case basis by the Recognized Organization who will provide all relevant information to IRB and TMA to be approved. The results of the surveys by remote inspection techniques when being used towards the crediting of surveys are to be acceptable to the attending Surveyor. Confirmatory surveys / close-up surveys may be carried out by the Surveyor at selected locations to verify the results of the remote inspection technique, if required.

5.5. Recognized Organizations shall submit their Remote Surveys procedures for the above-described surveys to the I.S.R. of Togo.

5.6. Remote Surveys carried out by the Recognized Organizations shall be reported on a monthly basis to the I.S.R. of Togo until further notice.

 For the International Ship Registry of Togo

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 For the Togolese Maritime Authority

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