

	CIRCULAR 2020-003 (rev 1)		
	DEPARTMENT OF MARINE SERVICES AND MERCHANT SHIPPING (ADOMS)		
	Maximum period of shipboard service for seafarers during Coronavirus Disease 2019 (COVID-19) pandemic	Ref	Circular 2020-001 (Rev.1)

Addressees(s):

- **MLC Shipowners, Operators and Managers of Vessels under the Flag of Antigua and Barbuda**
- **All Vessels registered under the Flag of Antigua and Barbuda**

1. Scope

[Circular 2020-001 \(Rev.1\)](#) refers to crew change procedures during COVID-19 pandemic. Under section 4.1.a, seafarers are permitted to continue to be engaged under their particular employment agreements beyond 11 months, if arrangements are being made by the MLC Shipowner to repatriate the affected seafarer at the next port. If crew change is not possible due to restrictions outside the control of the vessels managers, this needs to be communicated as per below procedure including an alternative repatriation solution.

This Circular now outlines the process, whereby MLC Shipowners can request an extension beyond a period of 11 months up to a time that permits repatriation, under the submitted company Repatriation Plan, for affected crew members, on their Antigua and Barbuda flag ships.

2. Legal Basis

- Antigua and Barbuda Merchant Shipping Act (MSA) 2006 and adhering Regulations

3. Summary / Excerpt

ADOMS will have to assist seafarers, MLC Shipowners, managers, and crewing companies considering the difficulties in conducting crew changes, due to port restrictions resulting from the outbreak of the pandemic.

4. ADOMS Policy

Shipping companies should complete and submit full details to technical@abregistry.ag in the form of a Repatriation Plan which is stamped, signed, and dated by the company (see example in Annex 1 of this Circular), which should include:

- Copies of valid Seafarer Employment Agreements (SEAs) and confirmation that all rights are maintained. Any new SEAs should be flexible and allow for repatriation issues and/or delays. New SEAs should be considered for a period that allows a reasonable margin, such that the 11 months onboard is not exceeded.
- Details of affected crew members with their sign on dates and date when 11 months onboard completed
- Signed and dated statement from the affected crew members accepting the extension
- Risk assessment, considering ship's trading pattern, rest hours, fatigue of the seafarers and other identified hazards
- Evidence of all efforts made for crew repatriation without success, including communications with port authorities
- Copy of minimum safe manning document
- Arrangements for repatriation at next available port

ADOMS has taken a pragmatic approach and introduced the above process, which must be fully complied with by MLC Shipowners, before making application. Upon satisfactory review of the above details, ADOMS will issue a Flag Statement, approving the repatriation plan.

Any request for a Flag Statement must be submitted well in advance, to allow time for a full review of submitted information and assessment of the Repatriation Plan.

Kindly also refer to [information-notice-2020-002 \(Rev 1\) novel-coronavirus guidance](#) on our website

ANNEX 1

Sample Repatriation Plan

COMPANY <i>(Name or logo)</i>	PLAN FOR THE SEAFARERS' REPATRIATION	
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Ship' Particulars:

Name of Ship	
IMO Number	
Call Sign	
Gross Tonnage	

DOC Holder, Manning Information:

DOC Holder	
Person in Charge (DPA)	
E-mail	
Phone	

Manning/Crewing Agent	
Person in Charge	
E-mail	
Phone	

Last Port of Call and Restrictions (Submit evidence of communication e.g. with authority)

Name of Port	ETA	ETD	Restrictions

Next Port(s) of Call and Restrictions (Submit evidence of communication e.g. with authority)

Name of Port	ETA	ETD	Restrictions

Repatriation Plan for crew more than 11 months on board:

	Name	Rank	Sign on	11 months completed on	End of contract	ETA of Sign off	Port of disembarkation
1							
2							
3							
Remarks:							

Alternatively:

	Name	Rank	Sign on	11 months completed on	End of contract	ETA of Sign off	Port of disembarkation
1							
2							
3							
Remarks:							

Shipping agency information at the port of disembarkation:

Name of Agency	
Person in Charge	
E-mail	
Phone	

Alternatively:

Name of Agency	
Person in Charge	
E-mail	
Phone	

Additional requirements

1. Evidence for travel arrangements to be attached/should be provided in due course (e.g. flight itinerary, copy of tickets)
2. Considering operation of ship, there should be early planning for crew repatriation before end of SEA
3. There should be willingness to deviate the vessel from its trading pattern to permit repatriation, involving all stakeholders in ship operations to address crew repatriation

Risk assessment attached, considering:

- Ship's trading pattern
- Rest hours
- Fatigue
- Other identified hazards

Name, Signature, Date, Stamp