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GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
DIRECTORATE GENERAL, PORTS & SHIPPING

Karachi, 13 July, 2020

From: Captain Qasim Saeed
Chief Nautical Surveyor

To: Chairman
Karachi Port Trust
Karachi.

Chairman
Port Qasim Authority
Karachi.

Chairman
Gwadar Port Authority
Gwadar.

Chairman
Pakistan National Shipping Corporation
Karachi.

Subject: CORONAVIRUS (COVID 19) – IMO CIRCULARS.

Please find enclosed herewith copies of circulars for your information and compliance.

1. Circular No. 4204/Add.15 dated 06-05-2020
2. Circular No. 4204/Add.16 dated 06-05-2020
3. Circular No. 4204/Add.4/Rev.1 dated 28-08-2020
4. Circular No. 4204/Add.21 dated 08-06-2020
5. Circular No. 4204/Add.23 dated 01-07-2020

Yours truly,

(Captain Qasim Saeed)
Chief Nautical Surveyor

Copy to:

1. PS to Director General, Ports & Shipping, Karachi, for information.
2. Chief Engineer & Ship Surveyor, Ports & Shipping, Karachi
3. Director of Shipping, Ports & Shipping, Karachi
4. Principal Officer, Mercantile Marine Department, Karachi

4 ALBERT EMBANKMENT
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Circular Letter No.4204/Add.16
6 May 2020

To: All IMO Member States
United Nations and specialized agencies
Intergovernmental organizations
Non-governmental organizations in consultative status with IMO

Subject: **Coronavirus (COVID 19) – COVID-19 related guidelines for ensuring a safe shipboard interface between ship and shore-based personnel**

The Secretary-General is aware that the Coronavirus (COVID-19) pandemic has created issues related to the shipboard interface between ship and shore-based personnel during port calls. Shipping is vital to the maintenance of global supply chains and it is vital that all parties in the ship/shore interface should keep everyone as safe as possible at all times and not place anyone, regardless of whether they are ship personnel or shore-based workers temporarily coming onboard, at undue risk.

The subject guidance in the annex aims to address major concerns and expectations of ships' crews and shore-based personnel through the implementation of practical, risk-based measures to address COVID-19 risks for all personnel involved in the ship/shore interface.

In order to safely manage a port call with respect to the ship/shore interface, it is incumbent on all parties to communicate in advance of the port call, to be open regarding each parties requirements to managing risk with respect to the COVID-19 virus and to be flexible and pragmatic in resolving any differences in requirements and expectations.

Expanding on the recommendations contained in Circular Letter No.4204/Add.6 of 27 March 2020, the Secretary-General has received the attached *COVID-19 related guidelines for ensuring a safe shipboard interface between ship and shore based personnel*, proposed by the following broad cross section of global industry associations in consultative status with the Organization: ICS, IAPH, BIMCO, IACS, IFSMA, IMPA, INTERTANKO, P&I Clubs, CLIA, INTERCARGO, InterManager, IPTA, FONASBA and WSC, and which also take account of input from the International Maritime Employers' Council (IMEC) and the International Support Vessel Owners Association (ISOA).

Member States and international organizations are invited to make use of the annexed Guidelines and to disseminate them among relevant national authorities with responsibility for, inter alia, maritime issues, health, customs, immigration, border control; and to liaise with relevant national authorities, as appropriate, with respect to the use and implementation of the Guidelines.

ANNEX

COVID-19 RELATED GUIDELINES FOR ENSURING A SAFE SHIPBOARD INTERFACE BETWEEN SHIP AND SHORE-BASED PERSONNEL

Introduction

1 The Coronavirus (COVID-19) pandemic has created issues related to the shipboard interface between seafarers and shore-based personnel during port calls. These issues are often related to the ship's crews and shore-based workers, such as agents, inspectors, pilots, stevedores, surveyors etc., following conflicting procedures to mitigate the risk of infection related to the virus. Differing procedures and requirements are currently being set globally for shore-based workers by national Administrations, local authorities, professional organizations and employing companies compared with those being set by flag States and shipping companies to be followed on board ships by ship's crews.

2 The objective of all parties in the ship/shore interface should be to keep everyone as safe as possible at all times, regardless of whether they are seafarers serving onboard a ship or shore-based workers temporarily coming onboard, and not to place anyone at undue risk or in a position they feel is unacceptable.

3 Requirements and guidance as applicable to individuals can be seen to differ from State to State and company to company and these differences regarding what should and should not be applied with respect to managing risk related to COVID-19 is creating perceptions that some parties are not following appropriate procedures, even though the procedures being followed may be those required by a responsible party.

4 There are differing views globally regarding what risk-based measures are appropriate during the pandemic and therefore different procedures are being implemented relating to interaction, personal protective equipment (PPE), social distancing, hygiene and testing.

Objective

5 This guidance aims to address major concerns and expectations of ship's crews and shore-based personnel through the implementation of practical, risk-based measures to address COVID-19 risks to all personnel involved in the ship/shore interface.

United Nations International Maritime Organization (IMO) recommendations

6 IMO Circular Letter No.4204/Add.6 *Preliminary list of recommendations for Governments and relevant national authorities on the facilitation of maritime trade during the COVID-19 pandemic* of 27 March 2020 contains, inter alia, the following recommendations to Member States on "Measures to ensure health protection in ports" in which "Governments and relevant national authorities are recommended to:

- Request ships to report any cases of illness indicative of COVID-19 infection on board as early as possible before arrival to the relevant authority in the port.
- Advise ships to regularly monitor shipboard personnel while in port for the exhibition of any symptoms associated with COVID-19 and report any changes in circumstances of the health of shipboard personnel to the relevant authority in the port.

- Consider temporarily restricting shipboard personnel to the ship while in port (except or until the situation permits otherwise) unless disembarking as part of a crew change or to receive emergency medical attention not available on board the ship.
- Limit, as far as possible, the number of interactions with shipboard personnel by entities in the port to only those critical and essential for the continued operation and supply of the ship.
- Provide information to port workers on basic protective measures against COVID-19 based on World Health Organization (WHO) advice.
- Ensure those working in ports and having access to ships are provided with appropriate personal protection equipment (which could include masks, hand sanitizers and other means of preventing the spread of the virus) prior to contact with seafarers.
- Request port authorities and port workers to comply with any screening or other protocols or procedures introduced by visiting ships to address COVID-19."

Risk management

7 In order to keep all ship and shore-based personnel as safe as possible, consideration should be given by all parties as to how best to manage risk related to COVID-19.

8 Appropriate control measures should be established to ensure that risks and impacts are managed to a tolerable level, and proportionate measures are established to reduce, control and manage the risks that Covid-19 poses to all persons.

Communication

9 As part of the risk management and control process it is recommended that prior to arrival in port the ship communicates its requirements related to COVID-19 risk management to all the anticipated service providers and port officials expected to attend on board during the port call, which may be coordinated through the ship's port agent if appropriate.

10 It is further recommended that prior to arrival in port the shore-based service providers and port officials communicate their requirements related to COVID-19 risk management to the ship, again this may be coordinated by the ship's port agent if appropriate.

Measures to be taken by shipping companies, shore-based service providers and port, immigration and customs authorities to address the risk from COVID-19 to their personnel

11 *Shipping companies.* In accordance with the ISM Code shipping companies are required to assess all identified risks to their ships and personnel and establish appropriate safeguards normally documented in their Safety Management Systems (SMS). As a result, shipping companies should have developed for each of their ships detailed plans and procedures related to different aspects and risks associated with the coronavirus (COVID-19) including the identified risks and associated mitigation from the interface of crews with shore-based personnel as part of the ship's operations. The risk-based procedures and guidance documented, should be based on the latest guidance related to COVID-19 from WHO, International Maritime Health Association (IMHA) and the ship's flag State requirements as appropriate and taking into account the "Hierarchy of controls as a guide to establishing effective safety control measures and reducing risk" detailed in table 1.

12 *Shore-based service providers.* Organizations providing shore-based service providers to ships, such as agents, chandlers, inspectors, pilots, stevedores, surveyors, service engineers etc, should implement risk-based procedures and guidance for their employees related to COVID-19 within their internal procedures, based on the latest guidance from WHO, IMHA and local port and national requirements as appropriate taking into account the "Hierarchy of controls as a guide to establishing effective safety control measures and reducing risk" detailed in table 1.

13 *Port, immigration and customs authorities.* Authorities responsible for Immigration Officers, Customs Officers, Port State Control Inspectors etc, should implement risk-based procedures and guidance for their employees related to COVID-19 within their internal procedures, based on the latest guidance from WHO, IMHA and local port and national requirements as appropriate taking into account the "Hierarchy of controls as a guide to establishing effective safety control measures and reducing risk" detailed in table 1.

Hierarchy of Controls

14 The following outlines a hierarchy of controls as a guide to establishing effective safety control measures and reducing risk.

Table - Hierarchy of controls as a guide to establishing effective safety control measures and reducing risk

1 Eliminate	<p>Elimination of the hazard is the most effective measure to reduce risks.</p> <p>Work onboard should not be conducted if there is a safer method to undertake the task, such as not going to a ship. In a number of instances e.g. conducting audit, surveys, inspections and training remote possibilities exist which may eliminate the need to go onboard or reduce the numbers of personnel needing to attend.</p>	<ul style="list-style-type: none"> Is attendance on board necessary at this time? Can the work be undertaken remotely? Can the work be postponed? <p>If attendance on board cannot be eliminated, then can the risk be reduced? For example, can numbers attending be reduced and/or can part of the work normally conducted onboard be reduced e.g. can documentary review and interviews etc. be conducted remotely?</p>
2 Reduce	<p>Can attendance on board be reduced?</p> <p>Where it is not possible to fully eliminate the hazards, the risk could be reduced by minimizing the onboard element of the work.</p>	<ul style="list-style-type: none"> Can numbers of persons attending onboard be reduced and/or duration of time spent onboard be reduced? Can part of the work be undertaken remotely e.g. visual inspections, witnessing drills, interviews? Is it necessary to attend on board in person or can meetings be set up remotely to reduce numbers attending and reduce duration? Can information be provided for remote review to reduce shipboard attendance? <p>Once attendance onboard has been reduced as far as possible, then consideration should be given to how to control the remaining risk.</p>
3 Communicate	<p>If onboard attendance of shore-based personnel cannot be eliminated,</p>	<ul style="list-style-type: none"> Have the ship's and shore-based organizations requirements related to risk management and control of COVID-19 been

	<p>communicate and understand participant requirements.</p> <p>Ensure requirements of each party, the ship and the shore-based organization have been communicated in good time to each other and are assessed and understood.</p> <p>If there are differences in requirements control measures should be agreed and understood by all parties prior to the shipboard intervention taking place.</p>	<p>communicated in good time to all parties prior to arrival? It is envisaged that the ship's agent will need to play an important role in this regard.</p> <ul style="list-style-type: none"> • Are the requirements of each party understood by the other parties? • Are requirements aligned e.g. requirements for the use of PPE? <p>If risk management and requirements of any party are not aligned or not understood, then additional administrative control measures may be necessary.</p>
<p>4 Control</p>	<p>If the requirements of each party, the ship and the shore-based organization have been communicated to each other and assessed, and are either not understood or there are differences then administrative control measures need to be taken so that all requirements are understood and so that requirements can be mutually agreed and understood by all parties prior to the shipboard intervention taking place.</p>	<p>If the control measures of the ship and the shore-based organization are not initially aligned or not fully understood identify actions required to rectify the situation.</p> <p>Considerations should include:</p> <ul style="list-style-type: none"> • Does additional explanation of requirements need to be provided? • If requirements are not understood and or aligned, can control measures be implemented through clarifying requirements and or agreeing mutually acceptable requirements? • What protective measures are in place on board and for the attending personnel? • Are alternative measures acceptable e.g. ship's provision of PPE to shore-based personnel? • Can social distancing be maintained? • Can entry into crew accommodation spaces be avoided/minimized? <p>Once mutually acceptable requirements that differ to normal practice for either party are agreed the requirements concerned should be clearly communicated and agreed by all parties impacted i.e. all ships' crew and all shore-based participants.</p>
<p>5 Personal Protective Equipment (PPE)</p>	<p>Understand what PPE is required and expected to be used by crew and shore-based personnel during attendance onboard and at what times.</p>	<p>In addition to understanding mutually agreed PPE expectations of both the ship's crew and shore-based staff the following should be assessed:</p> <ul style="list-style-type: none"> • Is the agreed PPE available to both parties? If not, can it be provided by the other party if necessary, either prior to or at the time of boarding? • Does available PPE comply with appropriate recommended specifications and is it compatible with the other PPE and equipment to be worn during the intervention. Does the provided PPE allow for the intended work to be carried out effectively? • Is the PPE sterile, where applicable? • Has the user been instructed how to inspect, wear, use and dispose of the PPE?

Managing differences

15 With differences in strategies and requirements to manage risks to persons from COVID-19 existing virtually country by country and company to company excellent communication in a timely manner between the ship, including the shipping company and its agents, with shore-based organizations intending to board the ship is essential and is the only way to effectively identify issues and manage differences in requirements relating to mitigating the risk to all personnel from the COVID-19 virus. In line with table 1 "Hierarchy of controls as a guide to establishing effective safety control measures and reducing risk", where differences exist in expectations between ship and shore requirements, these should be resolved by both parties to their mutual satisfaction prior to the ship arriving in port, thereby addressing the risks effectively, possibly by agreeing and adopting an equivalent measure, as well as ensuring misunderstandings, false expectations and associated frustrations of ship's crew and shore-based personnel are avoided.

Simple steps when on board

16 If attendance onboard a ship is unavoidable, the following are some simple steps and precautions that should be taken:

- Minimize the number of persons attending
- Use outer walkways rather than access through the crew accommodation.
- Limit time inside crew accommodation to the absolute minimum necessary to perform duties onboard
- Maintain social distancing – preferably 2 meters but at least 1 meter apart and limit interaction with crew members to those involved in performance of duties onboard
- Do not shake hands, use a wave, a nod or a bow
- Frequently clean your hands with soap and hot water for at least 20 seconds or use an alcohol-based hand rub
- Provide sanitising stations at appropriate locations e.g. the ship's gangway, entry points to accommodation, the bridge, control rooms
- Avoid touching eyes, nose and mouth
- If wearing a face mask, be sure it covers your mouth and nose
- Do not touch a face mask once it is on
- Immediately safely discard single-use masks after each use
- Clean your hands after removing masks

After the visit – disclosure of possible further transmission

17 In the 14 (fourteen) days following a ship visit, if either any shore-based person attending onboard a ship or any of the ship's crew develop COVID-19 symptoms, there is then a moral duty to contact those who may have been infected as a result to disclose this information. If the industry is to act properly and responsibly in minimizing the spread of the COVID-19 virus, this communication is essential and should form part of the mutually agreed requirements related to risk management and control of COVID-19 prior to boarding any ship.

Conclusion

18 In order to safely manage a port call with respect to the ship/shore interface, it is incumbent on all parties to communicate in advance of the port call, to be open regarding each parties requirements to managing risk with respect to the COVID-19 virus and be flexible and pragmatic in resolving any differences in requirements and expectations.

19 Reference can also be made to *Guidance for ship operators for the protection of the health of seafarers*, available as free download on the ICS website ([ICS | Covid-19](#)) and as stated in IMO Circular Letter No.4204/Add.4 dated 5 March 2020.
