



ZANZIBAR MARITIME AUTHORITY

01 MALINDI ROAD,
P.O.BOX 401,
71124 URBAN REGION,
ZANZIBAR - TANZANIA

TEL NO: +255 24 2236795
FAX NO: +255 024 2236796
WEBSITE: www.zma.go.tz
EMAIL: info@zma.go.tz

Marine Safety Advisory No. 05/2026

To: Ship Owners/Operators, Masters, Recognised Organisations, and Other Interested Parties of Tanzania Zanzibar Registered Vessels

Subject: Improper Extensions of Statutory Certification

Purpose: This Marine Safety Advisory draws attention to the Tokyo MoU Safety Bulletin 05/2026 on improper extensions of statutory certificates. It sets out actions for TZIRS-registered vessels and Recognised Organisations to identify and address any extension that may be inconsistent with the applicable Convention or Code before the vessel is exposed to port State control action.

Scope and Applicability: This Advisory applies to all vessels registered under TZIRS that hold, have requested, or are operating under an extension of a statutory certificate. The instructions to Recognised Organisations apply to all ROs authorised by TZIRS.

Date: 25 October 2026

1. Tokyo MoU Safety Bulletin

The Tokyo MoU Safety Bulletin 05/2026, issued in October 2026, addresses statutory certificate extensions that conflict with the requirements or limits in applicable international conventions. It reports that Port State Control Officers have encountered ships whose certificates were extended under SOLAS Chapter I, regulation 14(e) or (f), but which continued commercial trading instead of proceeding directly to the agreed discharge and survey ports.

The Bulletin notes that some ships received three-month extensions and continued, or intended to continue, normal commercial operations during that period. An extension is not an additional period of ordinary certificate validity. It may be granted only for the limited purpose permitted by the relevant Convention provision and where the Administration considers it proper and reasonable.



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2. Conditions for Statutory Certificate Extensions

Any extension must be permitted by a specific provision of an applicable Convention, Annex, Article, or Code with a time limit. It must be limited to the purpose allowed by that provision and supported by a proper and reasonable assessment. Under the guidance cited by the Tokyo MoU, an extension for completion of a voyage is to allow the ship to reach its named final cargo discharge port and then proceed directly to the named port where the required survey or dry-docking will be completed. It must not be used to continue commercial operations.

The following survey and voyage considerations should be addressed, as applicable:

- An additional survey equivalent to at least the scope of an annual survey should be carried out.
- Where a renewal survey is due, it should be progressed to the maximum extent possible.
- If dry-docking is required but cannot be carried out, an underwater inspection of the ship's bottom should be undertaken. If underwater inspection is not possible, an internal inspection of the bottom structure should be conducted to the maximum extent practicable.
- The vessel should proceed to the named final cargo discharge port and then directly to the agreed survey or dry-docking port.
- The extension period should be the minimum time required to complete the survey or dry-docking.
- The ship's condition, the voyage distance and duration, and any necessary operational restrictions should be considered.
- The extension period should not exceed the validity period of the new certificate that may be issued to document compliance with the recognized classification society's structural, mechanical, and electrical requirements.

Temporary relaxations introduced during the COVID-19 pandemic have been withdrawn, and normal statutory survey and certification procedures have been reinstated.

3. Actions Required of Ship Owners, Operators and Masters

Ship owners and operators shall promptly review the statutory certificates of every TZIRS-registered vessel in their fleet, including certificates that are currently extended, have an extension request pending, or are approaching expiry while required surveys remain outstanding. Masters shall ensure that the vessel's certificates and any extension documents are available on board and that the vessel complies with all stated conditions.

- Confirm the exact Convention or Code provision authorising each extension, its permitted purpose, the authorized period, and any voyage or operational restrictions.
- Check whether the ship is proceeding to the named discharge port and then directly to the agreed survey or dry-docking port, as applicable.



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- Do not treat an extension as authority to continue ordinary commercial trading. Do not undertake a further commercial voyage under an extension unless that voyage is expressly permitted by the applicable Convention provision and the extension conditions.
- Contact the issuing RO and TZIRS without delay if an extension has been issued, is being considered, or its legal basis or operating conditions are unclear. Provide the relevant certificates, extension letter, survey status, reason for the extension, approved voyage plan, and current vessel condition.
- If the vessel is already at sea under an extension, immediately notify the RO and TZIRS and follow the authorized voyage and restrictions while the case is reviewed.

4. Instructions to Recognised Organisations

Each RO authorised by TZIRS shall urgently review any extension already issued to a TZIRS-registered vessel, as well as any pending request, against the applicable Convention or Code, the RO's delegated authority, the relevant TZIRS-RO Agreement, and the guidance referenced in this Advisory.

- Before issuing an extension, verify and record the applicable legal provision, the reason for the extension, the surveys completed and outstanding, the vessel's condition, and the precise period and purpose allowed.
- Ensure that any extension is limited to the minimum period permitted and needed, and specify the named discharge port, the direct onward voyage to the survey or dry-docking port, and any operational restrictions where these apply.
- Where the proposed extension falls outside the RO's delegated authority, requires Flag Administration approval, or presents uncertainty as to its legal basis or conditions, refer the case to TZIRS and obtain written direction before issuance.
- Immediately notify TZIRS of any extension already issued that may not comply with the applicable Convention or Code, and submit the extension, supporting survey records, assessment, voyage conditions, and proposed corrective action.
- Do not issue or endorse an extension as a means of allowing continued commercial operations beyond an applicable survey, certification, or dry-docking interval.

ROs shall also bring this Advisory to the attention of their surveyors and relevant technical personnel and ensure that any case requiring immediate attention is escalated to TZIRS.

5. Port State Control Consequences and Immediate Coordination

The Tokyo MoU states that a ship found operating with statutory certificate extensions contrary to applicable Convention or Code requirements may be detained during a port State control inspection. Where the extension was issued by a Flag State-appointed RO, that RO may also be held responsible for the detention. Detention is not automatic; the decision rests with the relevant port State authority under the applicable inspection procedures.



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Any owner, operator, Master, or RO identifying a potentially non-compliant extension shall contact TZIRS and the issuing RO immediately, before the vessel undertakes further commercial operations or proceeds on a voyage inconsistent with the extension. Early review is intended to identify and address deficiencies in the extension, survey plan, or voyage arrangements before a PSC inspection.

6. Effectiveness and Enquiries

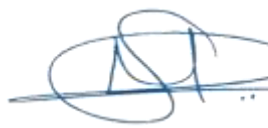
This Advisory takes effect immediately upon issuance and remains in force until amended or withdrawn by TZIRS. It shall be read together with the applicable international conventions, codes, IMO guidance, and the vessel's authorization and certification documents.

7. References

Tokyo MoU Safety Bulletin 05/2026, "Improper extensions of Statutory Certification", October 2026; SOLAS, Chapter I, regulation 14; IMO Circular MSC-MEPC.5/Circ.1; Survey Guidelines under the Harmonized System of Survey and Certification (HSSC) 2025, IMO Resolution A.1207(34); and Procedures for Port State Control, 2025, IMO Resolution A.1206(34).

For additional enquiries on this circular, please contact to:

Director General and the Registrar of Ships
Zanzibar Maritime Authority
P.O.BOX 401
Tel +255 24 2236795
Website: www.zma.go.tz
Email: technical@tzirs.tz



(MTUMWA S. SANDAL)
DIRECTOR GENERAL & REGISTRAR OF SHIPS

ANNEX I

Tokyo MoU Safety Bulletin 05/2026

Improper extensions of Statutory Certification

Full bulletin reproduced from the Tokyo MoU Safety Bulletin issued in October 2026.

October 2026

Improper extensions of Statutory Certification

This bulletin draws attention to the extension of statutory certificates which contradict convention requirements.

Purpose

This bulletin clarifies the position of Tokyo MOU Member Authorities on when statutory certification may be extended under international conventions including but not limited to the International Convention for the Safety of Life at Sea (SOLAS). It describes what we are finding and our actions to uphold international standards for the extension of certificates.

This safety bulletin is for:

- Ship owners and operators;
- Surveyors and Recognised Organisations (ROs);
- Master's and ships' officers; and
- Maritime Administrations, their officers, investigators and technical advisors.

Risk

The issue of extending statutory certificates beyond established requirements is not merely an administrative or certification matter. It is intrinsically linked to the verification of a ship's ongoing compliance, condition, and maintenance regime.

The impact of the COVID-19 pandemic on ship maintenance programmes has been well documented. As a result, many ships are only now approaching their first scheduled drydocking cycle since the pandemic. While deferring non-critical maintenance activities to a planned drydocking period is a common industry practice, such deferrals are predicated on ships remaining within approved survey and certification intervals.

Allowing ships to continue commercial operations beyond agreed drydocking and survey intervals introduces avoidable risk to maritime safety and environmental protection. Port and coastal States should not be expected to accept such risk where operators have had reasonable opportunity to plan for and complete required surveys, maintenance, and drydocking activities in accordance with statutory requirements.

Extension decision-making

The International Maritime Organization (IMO) has provided recommendations to administrations for extending the validity of certificates in MSC-MEPC.5/Circ.1.

Moreover, the Survey Guidelines under the

Improper extensions of Statutory Certification



Harmonised System of Survey and Certification (HSSC) 2025 (IMO Resolution A.1207(34)) (the IMO Guidance) provides a framework for extending a certificate when it is 'proper and reasonable to do so', in paragraph 5.9.1. Under that framework, extension decisions should consider whether the ship will sail directly to a named final agreed cargo discharge port and then directly to a named agreed port to complete the survey and/or dry-docking.

Tokyo MOU Member Authorities can only accept an extension if all of the following conditions are met:

- the extension is granted under a regulation in a Convention, an Annex to a Convention, an Article of a Convention or within a Code with limited time requirement;
- it is for the purpose of allowing a ship to complete its voyage to a final cargo discharge port, then directly to the port in which it is to be surveyed, but not be used to continue commercial operations; and
- it appears proper and reasonable to do so. (The IMO Guidance, in full (at paragraph 5.9.2), provides the basis for determining what is proper and reasonable).

General requirements for the extension of statutory surveys:

In accordance with IMO circular MSC-MEPC.5/Circ.1, where a ship is located at a port where the required survey cannot be completed, and the Convention permits the relevant Administration to extend the validity of the certificate, the Administration should be guided by the following provisions:

1. *An additional survey equivalent to at least the same scope of an annual survey required by the relevant certificate(s) should be carried out.*
2. *If a renewal survey is due, it should be progressed to the maximum extent possible.*
3. *In cases where dry docking is required but cannot be conducted, an underwater inspection of the ship's bottom should be carried out.*

4. *In cases where an underwater inspection is not possible (e.g. poor water visibility, draft restrictions, excessive current, refusal by the port authority), an internal inspection of the ship's bottom structure should be carried out to the maximum extent practicable.*
5. *The ship should be permitted to sail directly to a named final agreed cargo discharge port and then proceed directly to a named agreed port to complete the survey and/or dry docking.*
6. *The extension period should be the minimum time required to complete the survey and/or dry docking under the relevant certificate(s).*
7. *The condition of the ship identified in the foregoing surveys should be taken into account when determining the duration, distance and any operational restrictions applicable to the voyage required to complete the survey and/or dry docking.*
8. *The extension period of the relevant statutory certificate(s) should not exceed the validity period of the new certificate that may be issued to document compliance with the structural, mechanical and electrical requirements of the recognized classification society.*

What we find

Port State control officers are finding that ships have had their statutory certificates extended under SOLAS Chapter I, Reg 14(e) or (f) but continue to trade commercially and do not proceed directly to the port of survey.

We see ships that have been issued three-month extensions, and these ships continue to trade, or intend to trade, commercially for that period.

These ships:

- are not undertaking a direct voyage to their named cargo discharge and/or survey port
- have extensions for more than the minimum amount of time needed to complete the survey
- usually require dry docking as part of their

survey.

An extension is not an additional period of ordinary certificate validity. It may be granted only for the limited purpose permitted by the applicable Convention provision and only where the Administration determines that doing so is proper and reasonable.

We acknowledge that during the COVID-19 pandemic, relaxations were granted by the IMO (Circular Letter No.4204/Add.19) due to restrictions put in place by governments internationally. However, reliance on these temporary relaxations have been withdrawn as normal statutory survey and certification procedures have been reinstated.

References

- SOLAS, Chapter I
- Survey Guidelines under the Harmonised System of Survey and Certification (HSSC), IMO Resolution A.1207(34)
- IMO Circular MSC-MEPC.5/Circ.1
- Resolution A.1206(34) Procedures for Port State Control, 2025

Our actions

Where a ship has been found to have its statutory certificates extended contrary to a Convention or Code requirements, the ship may be detained as part of a port State control inspection. Where a flag State's appointed Recognised Organisation (RO) has issued the extension, the RO may be held responsible for such detention.

Tokyo MOU

The Memorandum of Understanding on Port State Control in the Asia-Pacific Region, known as the Tokyo MOU, was signed among eighteen maritime Authorities in the region on 1st December 1993 and came into operation on 1st April 1994. Currently, the Memorandum has 22 full members.

Tokyo MOU Secretariat

Ascend Shimbashi 8F, 6-19-19, Shimbashi, Minato-ku, Tokyo Japan 105-0004

Tel: +81-3-3433 0621 **Fax:** +81-3-3433 0624

Email: secretariat@tokyo-mou.org **Website:** www.tokyo-mou.org

