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AMSA HIGHLIGHTS INVALID EXTENSIONS OF STATUTORY CERTIFICATION

AMSA Marine Notice 2026/01 highlights concern over the inappropriate use of statutory certificate extensions, clarifies Australia's approach to such extensions, and outlines the Port State Control (PSC) actions that may be taken where an extension is found to be inconsistent with applicable Convention requirements.

OVERVIEW

The Notice addresses Australian vessel owners and operators, flag State authorities, and Recognized Organizations (ROs). For owners, operators and ROs, the key issue is whether an extension has a valid basis and supports the agreed voyage to the survey port.

KEY REQUIREMENTS

SOLAS Ch. I/Reg. 14(e) and IMO circular MSC-MEPC.5/Circ.1 provide requirements and recommendations to Administrations on certificate extensions.

General requirements for statutory survey extensions:

- No certificate shall be extended for more than three months (+3M)
- Concurrence from the flag Administration needs to be sought for extensions

KEY NOTES

Check the applicable Convention or Code before seeking an extension.

Confirm the agreed discharge and survey ports and the intended route.

A non-compliant extension may lead to detention; the issuing RO may be held responsible.

References:
AMSA Marine Notice 2026/01
IMO Resolution A.1207(34)
MSC-MEPC.5/Circ.1
IMO Resolution A.1206(34)

According to IMO circular MSC-MEPC.5/Circ.1, if a ship is in a port where the required survey cannot be completed, and where the Convention allows the Administration to extend the certificate, the Administration should be guided by the following:

- An **additional survey**, equivalent to at least the same scope of an annual survey required by the relevant certificate(s), should be carried out;
- If a **renewal survey** is due, it should be progressed to the maximum extent possible;
- In cases where a dry docking is required, but cannot be carried out, an **underwater inspection** of the ship's bottom should be carried out;
- 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**, to the maximum extent practicable, should be carried out;
- The ship should be allowed to 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;
- The extension period should be for the **minimum amount of time needed** to complete the survey and/or dry docking under the relevant certificate(s);
- The **condition of the ship** found by the surveys indicated above should be considered in determining the **duration, distance and operational restrictions**, if any, of the voyage needed to complete the survey and/or dry docking; and

- The extension period of the relevant statutory certificate(s) **should not exceed** the **period of validity** of the certificate which may be issued to document compliance with the structural, mechanical and electrical requirements of the recognized classification society.

The IMO Resolution A.1207(34), section 5.9, sets out recommended conditions for extending the validity of a certificate. Where the applicable Convention permits an extension and it is considered proper and reasonable, the Administration should be guided by these conditions, including that the ship should sail directly to the named final agreed cargo discharge port and then directly to the named agreed port for survey and/or dry-docking.

FLAG STATE MARINE NOTICES

Flag State	Key requirements	Application
 Marshall Islands	RMI Technical Circular 13, Rev. 1 (30 Apr 2026): Commercial reasons are not a basis for extending docking or renewal surveys. Facility unavailability requires evidence from at least three facilities and a confirmed booking.	• Submit a ship-specific request through RO to the Administrator. Record survey status, facilities contacted and the confirmed booking.
 Hong Kong	Hong Kong MD Special Application for Exemption (Apr 2020): This COVID-19-era form required applications for extension of statutory certificates to be routed through the ship's RO for Marine Department endorsement. Current MSIN 6/2025 confirms that authorized ROs carry out statutory surveys and certification for Hong Kong-registered cargo ships but does not itself set out a specific certificate-extension procedure.	• Do not rely on the April 2020 COVID-19 form as current general guidance. Confirm the applicable extension procedure with the RO and Hong Kong Marine Department under the relevant Convention requirements.
 Singapore	MPA Other Applications: MPA may extend surveys or certificates for Singapore-registered ships; applications are made through the RO that issued the certificate.	• Apply before the survey due date or certificate expiry and obtain ship-specific approval.
 Malta	Malta Merchant Shipping Notice 158 (17 Mar 2020): This COVID-19 measure provided for extension/postponement requests to be considered on a case-by-case basis, with applications for delegated statutory surveys submitted by the RO on the owner's behalf. The Notice was subsequently revoked by Merchant Shipping Notice 181 on 18 July 2023.	• Do not rely on Notice 158 as current guidance. Current extension requirements should be confirmed with the Merchant Shipping Directorate and the vessel's RO in accordance with the applicable Convention requirements.
 Liberia	Liberia Marine Advisory 28/2022, Rev. 1 (20 Nov 2025): Plan renewal surveys and dry-docking early. After due diligence, an exceptional extension may be considered for the minimum period needed, up to one month.	• The RO recommendation should include survey status, three authentic yard non-availability letters, a firm booking and outstanding conditions.
 Panama	Panama Merchant Marine Circular MMC-152 (May 2024), section 7.9: Certificate extensions should only be granted where proper and reasonable to allow the vessel to proceed to the agreed survey port. The extension should not exceed three months and should be limited to the minimum time necessary to complete the required survey and/or dry-docking.	• Confirm the ship-specific extension with SEGUMAR and comply with the conditions in MMC-152, section 7.9, including the agreed voyage, survey arrangements and applicable operational restrictions.
 Denmark	Danish RO Agreement 2015: An authorized RO may extend validity only within the relevant international or national instrument and Danish Maritime Authority instructions.	• Confirm the RO's authority, applicable limits and any conditions for the individual ship.

Flag State approval of an extension does not preclude independent PSC assessment. Port State authorities may examine whether both the extension and the ship's subsequent operation remain consistent with the applicable Convention or Code requirements. The above Flag State notices illustrate the different administrative approaches used for extension requests.

AMSA FINDINGS ON CERTIFICATE EXTENSIONS

AMSA reports that Australian Port State Control Officers (PSCOs) are finding ships whose statutory certificates have been extended under **SOLAS Chapter I, Regulation 14(e) or (f)**, but which continue to trade commercially rather **than proceeding directly to the port of survey**. AMSA has also observed ships issued **three-month extensions** that continue, or intend to continue, commercial trading during that period.

AMSA notes that these ships may:

- **not undertake 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**; and
- require **dry docking** as part of their survey.

AMSA HIGHLIGHT

AMSA states that a ship with an extension found to be contrary to the Convention or Code requirements may be detained during a PSC inspection. Depending on the circumstances and the applicable procedures, the ship may be allowed to sail under detention to the survey port.

Reported Australian case: A case note describes an unnamed vessel that was reportedly not permitted to return to Australia for loading during a three-month certificate extension. In the absence of vessel identification or an inspection record, the case is presented as an operational example rather than a verified detention finding.

OTHER PSC REGIMES

Tokyo MOU: Its Tokyo MOU Annual Report 2024 raised concern about some flag States and ROs extending certificates beyond Convention limits. In its Tokyo MOU PSCC36 Press Release, the PSC Committee discussed further cases and said it would consider measures to support a consistent inspection approach. These statements indicate regulatory attention; they do not establish the outcome of any particular inspection.

RECOMMENDATIONS

Owners and operators considering an extension should engage the issuing RO and flag Administration early, allowing time to review the legal basis, intended voyage and survey arrangements. The application and any approval should be specific to the ship and the circumstances, rather than treated as a general extension of trading time.

- **Identify the applicable Convention or code provision** and explain why the request is proper and reasonable.
- **Record the agreed final discharge and survey or dry-docking ports**, and plan the direct voyage described in the approval.
- **Request a period tied to the time reasonably needed** for that voyage and survey, rather than assuming the maximum available period will apply.
- **Check that the RO submission and flag State decision consistently describe** the ports, timing and any operating conditions.
- For vessels **operating in or calling at Australian ports** during a certificate extension period, operators should **pay particular attention to AMSA Marine Notice 2026/01** and ensure that the extension and subsequent voyage remain consistent with the applicable Convention or Code requirements, including the agreed voyage, survey arrangements and extension period.

ABS SUPPORT AND GUIDANCE

ABS is closely monitoring IMO implementations and updating Rules, Guides, and approval procedures. For additional information or assistance in assessing compliance with these revised guidelines, please contact your local ABS office or visit ABS Regulatory News.

REFERENCES

The source notice and documents used for the examples are listed below:

Document	Subject
IMO Resolution A.1207(34)	HSSC Survey Guidelines, 2025
MSC-MEPC.5/Circ.1	Recommended conditions for certificate extensions
IMO Resolution A.1206(34)	Procedures for Port State Control, 2025

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