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## Bulletin 008 - Permits, Permanent Exemptions and Equivalences

Notice to:  
Shipowners, Operators, Officers, Flag State Inspectors and Recognised Organisations

### 1. References

- a) International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS);
- b) International Convention on Load Lines, 1966, as modified by the Protocol of 1988 (LLC);
- c) International Convention for the Prevention of Pollution from Ships, as amended (MARPOL);
- d) International Convention for the Control and Management of Ships' ballast water and Sediments (BWMC);
- e) IMO Circular [SLS.14/Circ.115](#)<sup>1</sup> "Issue of Exemption Certificates under the 1974 SOLAS Convention and Amendments thereto".

### 2. Purpose

2.1 This Bulletin explains the process for applying for:

- .1 Temporary and Permanent Exemption from an IMO Convention or National requirement;
- .2 Extension of statutory survey period or validity of a certificate issued under an international convention; or
- .3 Postponement of a survey, servicing period or any other applicable national or international requirement; or
- .4 Equivalent arrangement to an IMO convention requirement.
- .5 Where the vessel does not correspond with the particulars of the affected certificate owing to failure of equipment, damage, etc.;
- .6 Where detainable deficiencies are identified and cannot be permanently repaired or rectified immediately.

### 3. Application

3.1 This Bulletin applies to all Barbadian vessels.

### 4. Introduction

4.1 As per SLS.14/Circ.115 the BMSR concurs that in various SOLAS regulations the words "exemptions", "relaxations", "dispensations", and "waivers" are used with apparently no intended difference in their meaning.

4.2 A **Permit** is a temporary release from a statutory requirement for a limited time period where a vessel is, temporarily, unable to comply with statutory provisions and are generally limited to the minimum period of time necessary for the vessel to reach a port where rectification of the deficiency can be accomplished. This includes extension and/or postponement of statutory surveys, audits, verifications, and inspections.

<sup>1</sup> <https://barbadosmaritime.org/wp-content/uploads/2022/11/SLSCirc.115.pdf>

- 4.3 An **Exemption** is a permanent release from compliance with a statutory convention requirement, due to the existence of specific circumstances as sanctioned by the provisions of that Convention.
- 4.4 An **Equivalence** is a permanent arrangement which provides the same general level of safety or intent of a Convention requirement without meeting all criteria for full compliance. Such arrangements can be accomplished, either independently or in combination with, alternative equipment, additional procedures/precautions, operational restrictions, etc.

## 5. Application for a Permit, Exemption and Equivalence

- 5.1 Barbados Recognised Organisations (ROs) are not authorised to issue a Permit, Permanent Exemption or Equivalence without the agreement of the BMSR.
- 5.2 Applications are to be submitted to the BMSR directly or via the RO that has issued the relevant Statutory certificate. The application should include, but not be limited to, the following:
- .1 Reason and justification;
  - .2 Temporary measures in place;
  - .3 Corrective action plan to rectify the deficiency
  - .4 Supporting documentation.
- 5.3 When the application is submitted through the RO, the RO shall review the application and provide the BMSR with:
- .1 Provisions contained in any applicable IMO convention, code, or IMO circulars;
  - .2 Provisions contained in Barbados national regulations.
  - .3 Recommendations and justification.

## 6. BMSR Documents of Approval

- 6.1 Approval of an application for Permit, Permanent Exemption or Equivalence is officially granted by the BMSR with the issuance of one of the below documents:
- .1 Single Voyage Permit;
  - .2 Temporary Permission;
  - .3 SOLAS Exemption Certificate;
  - .4 Load Line Exemption Certificate;
  - .5 Permanent Exemption;
  - .6 Permanent Equivalence;
- 6.2 The Temporary Permission and Single Voyage Permit are both a permit as defined in section 4.2 above.
- 6.3 A Temporary Permission, unless otherwise stated in a convention or code, is generally issued for a maximum period of three (3) months, but may be re-issued if the defect is not rectified in time. In some circumstances (e.g., if repairs need to be carried out in a dry dock or spare parts are unavailable) a Temporary Permission is issued for longer periods.
- 6.4 A Single Voyage Permit is a permit with validity only for the single voyage.

- 6.5 A Permanent Exemption, SOLAS Exemption Certificate and International Load Line Exemption Certificate are all exemptions, as defined in section 4.3 above, and are linked to, and retained with, its associated statutory certificate.
- 6.6 A SOLAS Exemption Certificate is issued for an exemption from a provision of SOLAS, as listed in Annex of SLS.14/Circ.115, and based on the form provided in SOLAS.
- 6.7 A Load Line Exemption Certificate is issued for an exemption as per Article 6 of the LLC, and based on the form provided in the LLC.
- 6.8 A Permanent Exemption is issued for an exemption from provision of any other IMO convention, such as MARPOL, BWMC etc.
- 6.9 A Permanent Equivalence is issued for an equivalence to any IMO convention.
- 6.10 Exemptions and Equivalences are communicated to the IMO, through the IMO Global Integrated Shipping Information System ([GISIS](#)<sup>2</sup>).
- 6.11 As per SLS.14/Circ.115, when a Permit, an Exemption or an Equivalence is issued, port State authorities should interpret this as meaning that the vessel complies with the provisions of the Convention.
- 6.12 Port State authorities, whenever needed, can check validity of a BMSR Permit, Exemption or Equivalence on the BMSR portal [Validate a Document](#)<sup>3</sup> or using the barcode on the electronic certificates issued by the BMSR.
- 6.13 For a BMSR Permit, Exemption or Equivalence without a barcode, Port State authorities can contact BMSR by email to [ops@barbadosmaritime.com](mailto:ops@barbadosmaritime.com).

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<sup>2</sup> <https://gisis.imo.org/Public/Default.aspx>

<sup>3</sup> [https://portal.barbadosmaritime.org/certificate\\_validators](https://portal.barbadosmaritime.org/certificate_validators)

**Revision History**

Version	Description of Revision
1.0	Replaces Information Bulletin No. 318