



Thursday, 9 July 2020

Dato` Hj. Baharin Bin Dato Abdul Hamid
Director General
Marine Department (MARDEP)
Jalan Limbungan, Kawasan 13,
42007 Port Klang, Pelabuhan Klang
Malaysia
baharin@marine.gov.my

Re: Recognition of IMO Circular Letter No.4204/Add. 13 calling for the designation of personnel in the offshore energy sector as ‘Key Personnel’ and Circular Letter No.4204/Add.14 setting out a Recommended framework of protocols for ensuring safe ship crew changes and travel during the coronavirus (COVID-19) pandemic

Dear Sirs,

The undersigned represent a group of International Associations whose member companies are engaged in the essential elements of the global offshore energy sector. Together, and on behalf of our respective Member companies we represent the interests of international personnel working within the offshore energy sector. These personnel perform a wide variety of specialised roles which are all critical to the daily functioning of maintaining global energy supplies.

The offshore energy sector recognises the considerable Government efforts which have been implemented across the world to address the immediate public health emergency posed by the COVID-19 pandemic. However, whilst every effort has to be made to prevent the spread of this virus, it is also important that the vital role played by the offshore energy sector continues with minimal disruption. The security of supply in all forms of hydrocarbon and renewable energy sources remains of the utmost importance, both for immediate societal needs, and to ensure that supply in the medium to long term as demand increases with the easing of restrictions on work and travel.

We wish to highlight the Circular Letter No.4204/Add.13 (annexed to this letter), issued by the United Nations International Maritime Organization (IMO) and respectfully request that your government implements the recommendations attached to the IMO circular. These recommendations detail the necessary action required to facilitate the movement of ‘key workers’ to and from their places of work on all vessels and installations engaged in offshore energy sector activities.

Importantly, this Circular Letter addresses the needs of *all* offshore workers engaged in the broad spectrum of activities that comprise the offshore energy sector and recommends that such personnel be designated as key workers. The imperative for efficient crew changes is vital to ensuring the safety of workers offshore.

Given the critical role of the offshore energy sector to society, the undersigned International Associations request your assistance in ensuring that our Member companies can effect changes of crew and other personnel in your jurisdiction, while recognising the need to



manage the risks posed by COVID-19. We wish to bring your attention to Circular Letter 4204/Add.14¹, published by the IMO, which sets out a recommended framework of protocols for ensuring safe ship crew changes and travel during the coronavirus (COVID-19) pandemic. These protocols are supported by the IMO Secretary-General who has urged Member States to implement them. One of the key recommendations contained within the protocols requests that Governments give serious consideration to exempting seafarers and offshore energy sector personnel from any isolation or quarantine measures that might be applicable to other passengers arriving by aircraft from other countries. We respectfully request your Government's recognition of the protocols and agreement to implement them. Our Members will ensure that all national, regional and local requirements are taken into account before proceeding to effect crew/personnel changes.

We would be most grateful if you can draw our request to the attention of the appropriate authorities within your administration who are best placed to assist in meeting these objectives.

Yours faithfully,

Jim Rocco
Sr Director, Government & Industry Affairs – Offshore
International Association of Drilling Contractors (IADC)
jim.rocco@iadc.org

Dustin Van Liew
Vice President, Regulatory & Governmental Affairs
International Association of Geophysical Contractors (IAGC)
dustin.vanliew@iagc.org

Margaret Fitzgerald
Head of Policy & Regulatory Affairs
International Maritime Contractors Association
margaret.fitzgerald@imca-int.com

Olav Skår
Safety Director
International Association of Oil & Gas Producers
os@iogp.org

Tony Mason
Secretary
International Support Vessel Owners' Association
isoa@marisec.org

¹[http://www.imo.org/en/MediaCentre/HotTopics/Documents/COVID%20CL%204204%20adds/Circular%20Letter%20No.4204-Add.14%20-%20Coronavirus%20\(Covid-19\)%20-%20Recommended%20Framework%20Of%20Protocols.pdf](http://www.imo.org/en/MediaCentre/HotTopics/Documents/COVID%20CL%204204%20adds/Circular%20Letter%20No.4204-Add.14%20-%20Coronavirus%20(Covid-19)%20-%20Recommended%20Framework%20Of%20Protocols.pdf)

Addendum 1 – IMO Circular Letter No.4204 Add. 13

**E**

4 ALBERT EMBANKMENT
LONDON SE1 7SR
Telephone: +44 (0)20 7735 7611 Fax: +44 (0)20 7587 3210

Circular Letter No.4204/Add.13
5 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) – Recommendations for Governments and relevant national authorities on facilitating the movement of offshore energy sector personnel during the COVID-19 pandemic**

Following Circular Letter No.4204/Add.6, which addresses the need to facilitate the movement of seafarers during the COVID-19 pandemic, the Secretary-General has received a set of *Recommendations for Governments and relevant national authorities on facilitating the movement of offshore energy sector personnel during the COVID-19 pandemic*, prepared by the following global industry associations in consultative status with the Organization representing the offshore energy sector: IADC, IOGP and IMCA; and also the International Association of Geophysical Contractors (IAGC) and the International Support Vessel Owners Association (ISOA).

The recommendations, set out in the annex, address the needs of the workers in the offshore energy sector who face challenges similar to those of seafarers. Member States and international organizations are invited to make use of the annexed recommendations and to circulate them to all interested parties, as deemed appropriate.

ANNEX**RECOMMENDATIONS FOR GOVERNMENTS AND RELEVANT NATIONAL
AUTHORITIES ON FACILITATING THE MOVEMENT OF OFFSHORE
ENERGY SECTOR PERSONNEL DURING THE COVID-19 PANDEMIC**

The offshore energy sector plays a critical role in meeting the world's energy demands. Services provided include the production and distribution of oil and gas, electricity and renewable energy worldwide; and workers include, inter alia, seafarers, technicians, engineers and other specialist marine, support and industrial personnel. The continued delivery of an unabated supply of these energy resources rests with the ability of the global offshore energy workforce to continue to carry out its function despite the challenges of the COVID-19 pandemic.

This annex provides recommendations particularly suited for application to the offshore energy sector workforce.

Member States are encouraged to exercise a practical and pragmatic approach, in these unusual times, to the offshore energy sector workforce with regard to issues like personnel changeovers, resupply, repairs, survey and certification.

Given the critical role of the offshore energy sector for society, Governments are strongly encouraged to recognise offshore energy sector personnel as "key workers" and to facilitate their movement while recognising the need to manage the risks posed by COVID-19.

Expanding upon the measures set out in Circular Letter No.4204/Add.6, which are intended to facilitate maritime transport, Governments and relevant national authorities are recommended to:

- .1 Designate offshore energy sector personnel, regardless of nationality when within respective countries' jurisdiction, as "key workers" providing essential services in support of the offshore energy industry.
- .2 Grant offshore energy sector personnel any necessary and appropriate exemptions from national travel or movement restrictions in order to facilitate their transit to and from their place of work.
- .3 Accept, inter alia, official identity documents, discharge books, employment agreements and letters of appointment from the employer as evidence that offshore energy sector personnel are designated as "key workers", where necessary, to facilitate crew/key personnel changes.
- .4 Permit offshore energy sector personnel to transit through territories (i.e. to/from airports, heliports, seaports) for the purposes of crew/key personnel changes and repatriation.
- .5 Implement appropriate approval and screening protocols for offshore energy sector personnel seeking to transit to and from their place of work.
- .6 Provide information to offshore energy sector personnel on basic protective measures against COVID-19, based on WHO advice.*

* <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/advice-for-public>



Circular Letter No.4204/Add.13
Annex, page 2

Reference is also invited to the following previously issued IMO circular letters:

- .1 Circular Letter No.4204/Add.1 (Covid-19 – Implementation and enforcement of relevant IMO Instruments); and
- .2 Circular Letter No.4204/Add.6 (Coronavirus (Covid-19) – Preliminary list of recommendations for Governments and relevant national authorities on the facilitation of maritime trade during the COVID-19 pandemic).



Addendum 2 – About the International Associations

International Association of Drilling Contractors (IADC)

Established in 1940, IADC operates on 6 continents, and its members are acknowledged leaders in onshore and offshore drilling operations around the world. IADC is globally recognized for its work in providing: accreditation programs for a competent global upstream energy workforce, technical publications serving industry and regulatory authorities, international conferences, and collaborative government-industry advocacy work. IADC's collective efforts contribute to operational proficiencies that underpin the world's upstream energy industry while sustaining high standards of safety, environmental stewardship and operational efficiency.

International Association of Geophysical Contractors (IAGC)

Founded in 1971, the IAGC is the global trade association for the geophysical and exploration industry, the cornerstone of the energy industry. With more than 80 member companies in 50 countries employing an estimated 87,000 people with revenues exceeding 11.5 Billion (USD), our membership includes onshore and offshore survey operators and acquisition companies, data and processing providers, exploration and production companies, equipment and software manufacturers, and industry suppliers and service providers. IAGC member companies play an integral role in the successful exploration and development of offshore hydrocarbon resources through the acquisition and processing of geophysical data.

International Maritime Contractors Association (IMCA)

The International Marine Contractors Association (IMCA) is a leading trade association representing the vast majority of contractors and the associated supply chain in the offshore marine construction industry worldwide. We have a membership of over 900 companies including contractors, suppliers, oil & gas companies, marine renewable energy companies and numerous non-governmental organisations (NGOs).

International Association of Oil & Gas Producers (IOGP)

The International Association of Oil & Gas Producers (IOGP) is the voice of the global upstream industry. Oil and gas continue to provide a significant proportion of the world's energy to meet growing demands for heat, light and transport. Our Members produce 40% of the world's oil and gas. They operate in all producing regions: the Americas, Africa, Europe, the Middle East, the Caspian, Asia and Australia. We serve industry regulators as a global partner for improving safety, environmental and social performance. We also act as a uniquely upstream forum in which our Members identify and share knowledge and good practices to achieve improvements in health, safety, the environment, security and social responsibility.

International Support Vessel Owner's Association (ISOA)

ISOA is the international trade association for owners/operators of support vessels in the offshore industry. ISOA's main focus is in the sector of Platform Supply Vessels (PSV) and Anchor Handling Tug Supply Vessels (AHTS), albeit our members also operate a variety of other vessel types.