

REGULATORY CIRCULAR

Mandatory Flag State Inspection Requirements for Comoros-Flagged Vessels Operating within the Paris MoU Region

Circular No.	IMC26C002	Issue date	30 July 2026
Action	Immediate	Flag reference	Circular No. 40 / Ref. 25/04957/COM

NOTICE TO: Shipowners / Managers / Operators / Masters / CSOs / Surveyors / Auditors

CRITICAL REQUIREMENT: A Comoros-flagged vessel shall not enter, transit through, trade within, or conduct commercial operations in the Paris MoU region unless it has successfully completed a satisfactory Flag State Inspection (FSI) and holds the required evidence/certificate issued or accepted by the Comoros Maritime Administration.

01 BACKGROUND AND PURPOSE

The Union of the Comoros Maritime Administration issued **Circular No. 40** to establish a mandatory compliance framework for Comoros-flagged vessels operating within the Paris Memorandum of Understanding on Port State Control (Paris MoU) region. The measure is intended to improve fleet safety and compliance performance, reduce Port State Control detentions, and ensure consistent adherence to applicable international and statutory requirements.

The Flag requirement entered into force on 16 December 2025 and remains valid until further notice. The Administration states that the requirement will be enforced without exception or exemption.

02 SCOPE OF APPLICATION

- **Existing fleet:** All vessels currently registered under the Comoros flag and actively trading or intending to trade within the Paris MoU region.
- **New registrations:** All newly registered Comoros-flagged vessels before their first port call or commercial operation within the Paris MoU region.
- **Following specified events:** Vessels returning to Paris MoU operations following a Port State Control detention, transfer of flag, change of Recognized Organization, rectification of major deficiencies, implementation of corrective actions directed by PSC or the Flag Administration, or structural/operational modifications affecting statutory compliance.

03 INSPECTION AND VALIDITY REQUIREMENTS

- The FSI shall be conducted by the Comoros Maritime Administration or by a party/inspector specifically authorized by the Administration.
- The FSI must be completed before the vessel enters the Paris MoU region.
- A satisfactory FSI is generally valid for six (6) months, unless the Administration specifies otherwise.
- Documentary evidence of the satisfactory FSI shall be retained onboard and made available to Port State Control officers upon request.
- A routine class survey, statutory survey, audit, or attendance shall not be treated as the required FSI unless the Comoros Maritime Administration has expressly authorized or accepted it for that purpose.

ACTION REQUIRED FROM OWNERS / MANAGERS

- Review all intended voyages and port calls to determine whether the vessel will enter or operate within the Paris MoU region.
- Do not dispatch or route a vessel into the Paris MoU region without confirming that a valid satisfactory FSI is in place.
- Contact the Comoros Maritime Administration and the assigned IMC office sufficiently in advance to confirm the required inspection arrangements and authorization status.
- Provide the vessel schedule, current location, anticipated Paris MoU entry date, latest PSC history, and copies of relevant statutory/class certificates when requesting assistance.

04 OPERATIONAL PLANNING AND NOTIFICATION

Owners and managers should arrange the FSI at the last suitable port before entry into the Paris MoU region, allowing adequate time for attendance, rectification of findings, issuance/acceptance of the satisfactory FSI evidence, and any Administration review. Voyage commitments should not be finalized on the assumption that an inspection can be completed after entry.

Where IMC support is requested, the owner/manager shall provide the information below. Any inspection coordination or attendance by IMC remains subject to confirmation of the Comoros Administration's authorization and instructions.

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| ☐ Vessel name and IMO number | ☐ Latest PSC inspection/detention records |
| ☐ Current position and next ports | ☐ Status of class and statutory certificates |
| ☐ Expected date of Paris MoU entry | ☐ Outstanding deficiencies/conditions |
| ☐ Voyage schedule and agent details | ☐ Relevant modifications or change of RO/flag |

05 CONSEQUENCES OF NON-COMPLIANCE

Failure to comply may lead to administrative and operational sanctions imposed by the Comoros Maritime Administration, including:

- Denial of authorization for the vessel to enter, operate, or trade within the Paris MoU region until full compliance is achieved.
- Suspension, detention, or withdrawal action affecting statutory certificates issued by or on behalf of the Flag State.
- Trade restrictions, port-specific limitations, or mandatory routing requirements.
- Additional Flag State inspections, verification with Port State Control authorities, or comprehensive audits, with associated costs borne by the vessel operator.
- Administrative penalties and any other measures considered necessary by the Administration.

06 MASTER AND COMPANY RESPONSIBILITIES

- The Company shall maintain an effective voyage-planning control to identify Paris MoU exposure before fixture, nomination, or sailing instructions are confirmed.
- The Master shall verify before entry that the required satisfactory FSI evidence is valid, available onboard, and readily presentable to PSC officers.
- Any detention, major deficiency, structural/operational modification, change of RO, or relevant change of status shall be promptly reported to the Administration and IMC.
- Corrective actions arising from the FSI or PSC shall be closed within the timeframe accepted by the Administration, with objective evidence retained onboard and ashore.

07 REFERENCES AND CONTACTS

Flag circular	Union of the Comoros Maritime Administration Circular No. 40, Ref. 25/04957/COM, dated 16 December 2025.
Flag contact	PIC: Ayaz Burud Email: info@comorosmaritim.org Office: +269 7739779 Emergency: +269 3437145
IMC contact	Assigned IMC Office / Survey Coordinator Email: technical@classimc.com Website: www.classimc.com
Entry into force	16 December 2025 - valid until further notice.

Important: This IMC circular summarizes the Flag Administration's requirements for operational compliance support. It does not replace the original Flag circular or any subsequent instruction. In case of conflict, the latest written instruction of the Union of the Comoros Maritime Administration shall prevail.