

Ref No. : 25/04957/COMDate : 16.12.2025Page : 3 (Three)**To,**

OWNERS/MANAGERS, DEPUTY COMMISSIONERS (DCS),  
COMPANY SECURITY OFFICERS (CSOS), MASTERS, RECOGNIZED ORGANIZATIONS (ROS)

**SUBJET: Mandatory Flag State Inspection (FSI) Requirements for Vessels Operating within the Paris Memorandum of Understanding (Paris MoU) Region**

### **Preamble**

The Maritime Administration of the Union of the Comoros, in exercise of its sovereign authority and responsibility as the Flag State, and in accordance with international maritime law, the International Maritime Organization (IMO) conventions, and recognized standards for the maintenance of vessel safety, marine environmental protection, and operational compliance, hereby issues the following administrative circular:

### **1. Purpose and objective**

The purpose of this Circular is to:

- 1.1. Establish a mandatory compliance framework for all vessels flying the Comoros flag operating within the Paris Memorandum of Understanding region;
- 1.2. Enhance the safety performance and compliance profile of the Comoros merchant fleet;
- 1.3. Reduce the incidence of Port State Control detentions and associated operational disruptions;
- 1.4. Ensure consistent and demonstrable adherence to all applicable international maritime safety standards, environmental regulations, and statutory requirements;
- 1.5. Strengthen the reputation and standing of the Comoros Flag with Port State Control authorities within the Paris MoU region.

### **2. Mandatory requirement and effective date**

- 2.1. With immediate effect as of 16<sup>th</sup> December 2025, no vessel flying the flag of the Union of the Comoros shall be authorized to enter, transit through, trade within, or conduct commercial operations in any port or waters under the jurisdiction of Port States within the Paris Memorandum of Understanding region unless the vessel has successfully completed and obtained a satisfactory Flag State Inspection (FSI) certificate issued by the Maritime Administration or by an authorized delegated inspector.
- 2.2. This requirement shall be strictly enforced without exception or exemption.



### 3. Scope of application

The mandatory FSI requirement applies to the following categories of vessels and circumstances:

- a) Existing Fleet: All vessels currently registered under the Comoros flag and actively engaged in trading within the Paris MoU region;
- b) New Registrations: All newly registered vessels under the Comoros flag prior to their first port call or commercial operation within the Paris MoU region;
- c) Post-Incident Operations: Vessels that have experienced any of the following circumstances prior to returning to operations within the Paris MoU region:

Detention by any Port State Control authority;

- Transfer of flag or change of Recognized Organization;
- Rectification of major deficiencies or implementation of corrective actions as directed by Port State Control or the Flag Administration;
- Structural or operational modifications affecting compliance with applicable statutory requirements.

### 4. validity of flag state inspection

- 4.1. The Flag State Inspection shall be:
- 4.2. Conducted by the Flag Administration or an authorized party;
- 4.3. Completed prior to entry into the Paris MoU region;
- 4.4. Valid for a period of 6 months, unless otherwise specified by the Administration.
- 4.5. Documentary evidence of a satisfactory FSI report shall be retained on board and made available to Port State Control officers upon request.

### 5. Non-compliance reinforcement and non-compliance measures

Failure to comply with the requirements established in this Circular shall result in administrative and operational sanctions, which may include:

- 5.1. Denial of Authorization: The Maritime Administration shall deny authorization for the vessel to enter, operate, or trade within the Paris MoU region until full compliance is achieved;
- 5.2. Certificate Actions: Suspension, detention, or withdrawal of all statutory certificates (Safety Management Certificate, International Safety Management (ISM) Certificate, or equivalents) issued by or on behalf of the Flag State;
- 5.3. Operational Restrictions: Imposition of trade restrictions, port-specific limitations, or mandatory routing requirements;
- 5.4. Inspection and Audit Requirements: Requirement for additional Flag State inspections, Port State Control cooperation verification, or comprehensive audits, with all associated costs borne by the vessel operator;



- 5.5. Administrative Penalties: Imposition of administrative penalties in accordance with applicable maritime legislation;
- 5.6. Escalated Measures: Implementation of any additional measures deemed necessary and proportionate by the Maritime Administration to ensure compliance.

## 6. Entry into force

This Circular enters into force **16<sup>th</sup> December 2025** and remains valid until further notice. Shipowners, Operators, Managers, and Masters are instructed to ensure strict compliance with the above requirements.

## 7. Contact

Should you require any additional information, you may contact our Technical Department as provided below:

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We take this opportunity to reassure that human life, marine environment and property are always considered as a priority for the Maritime Administration of Comoros which is committed to the safety of the maritime industry and the users around the world.



**Maritime Affairs Department**

**Mohamed Said Salim Dahalani**  
**Registrar**