

Belgian Maritime Inspectorate – Flagstate Natiënkaai 5 8400 Oostende BELGIUM Ship.Belflag@mobilit.fgov.be

# **BMI Circular 2025/001**

# **Continuous Synopsis Record (CSR)**

Date: 19/02/2025

To whom it may concern,

This BMI Circular supersedes BMI Circular 2004/001 'ISPS Code: Continuous Synopsis Record', BMI Circular 2004/005 'ISPS Code: Continuous Synopsis Record' and BMI Circular 2010/002 'Clarification to our circulars concerning the Continuous Synopsis Record'.

The Belgian Maritime Inspectorate (BMI) hereby provides instructions on the continuous Synopsis Record (CSR) on Belgian ships to all concerned parties (shipowners and managing companies, Port State Control officials, ships' crews and all other stakeholders).

The Belgian CSR's are in accordance with SOLAS, Chapter XI-1 and IMO Resolution A.959(23), as amended. They are not discussed in detail.

As the BMI issues certificates to Belgian ships in electronic format, this has consequences for the CSR. For further information on electronic certificates by BMI in general, reference is made to BMI Circular 2021-002 Electronic certificates by BMI – Navicert'. This BMI Circular can be found on <u>our website</u>.

#### I. Introduction

Since 1 July 2004, SOLAS Regulation XI-1/5 requires all passenger ships and all cargo ships of 500 gross tonnage and above engaged on international voyages to have on board a Continuous Synopsis Record (CSR).

The CSR (file) is intended to provide an on-board record of the history of the ship with respect to the information recorded therein. It is a form of log book that stays with the ship for its whole life, and records all changes of registered owner(s), flag, name, registered bareboat charterer(s), ISM Company Recognised (security) organisation, ... This CSR (file) builds up, over time, the history of the ship and constitutes the Continuous Synopsis Record, all of which **MUST** be available, on request, to authorized port state inspectors, Duly Authorised Officers (DAO's), flag state inspectors, ...

The ship must keep its copy of the whole CSR (file) onboard even when it transfers to another flag state, when it is sold to another owner, when it is taken over by another bareboat charterer or when another company assumes the responsibility of the ship operation.

The Master is responsible for the proper upkeep of the CSR onboard Belgian ships. It is important that the details are always correct as Port State Control will check the CSR as a matter of routine at inspections. The original CSR documents must not be modified, deleted, erased or stained.

It is important to note that where there is an electronic CSR, the electronic version of the CSR is considered to be the original. Therefore, while the Master may wish to maintain a paper CSR file, the electronic PDF version of any digital CSRs should be available for inspection at all times. Previously issued CSRs which are in the old format will remain valid and will not be reissued.

The Belgian Maritime Inspectorate (BMI) issues CSR's for Belgian registered ships in the English language.

## II. Content of the CSR file

A ship's CSR file comprises:

- 1) CSR Form 1 Continuous Synopsis Record,
- 2) CSR Form 2 Amendment to the Continuous Synopsis Record,
- 3) CSR Form 3 Index of amendments to Continuous Synopsis Record.

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#### A. CSR Form 1 – Continuous Synopsis Record

On board there must be a file with all consecutive Continuous Synopsis Records (CSR Form 1) issued by the ship's Administration(s) over the life of the ship, numbered sequentially.

The latest CSR Form 1 must be up to date with the records of the current ship's details.

The CSR Form 1 shall be completed according to the information provided by the Company or Master on a signed CSR Form 2. During the time it takes to deliver the new CSR Form 1 on board, a copy of the CSR Form 2 signed by the Master or Company will act as substitute.

The BMI issues certificates to Belgian ships in electronic format. Reference is made to <u>BMI Circular</u> 2021/002 'Electronic ship certificates by BMI – Navicert'.

It is to be noted that the Master has to countersign a CSR Form 1 upon receiving it on board. Since this is not possible in electronic format in Navicert, BMI requires the Master to print the CSR, countersign it and file it on board together with the previous CSR's, if any. The unsigned electronic CSR will remain available within Navicert. Previous CSR's Form 1 issued by other flagstates and previous CSR's Form 1 issued by BMI on paper will never appear in Navicert.

#### B. CSR Form 2 – Amendment to the Continuous Synopsis Record

If any entry in the current CSR needs to be amended, these amendments need to be completed on the document 'Amendment to the Continuous Synopsis Record' (CSR Form 2) and sent to the BMI to amend CSR Form 1. The format of CSR Form 2 can be found in annex.

When preparing CSR Form 2, the following should be considered:

- a) **Date of registration** with the State indicated in 2: this is the date of registration mentioned on the Belgian Certificate of Registry.
- b) Name of current registered owner(s) & Registered Address(es): this should be the one(s) mentioned on the Certificate of Registry.
  - It is mandatory to fill in the primary owner. Mention of additional owners is optional.
- c) Registered bareboat Charterer(s) Name & Address: This must be the one(s) mentioned on the Belgian Certificate of Registry.
- d) Name of Company (International Safety Management) & Registered Address(es): this is the Company who has assumed the responsibility for operation of the ship.

- e) Administration/Government/Recognised organisation which issued Document of Compliance (DOC): The Belgian Maritime Inspectorate (BMI) mainly carries out DOC audits itself and issues the corresponding DOC certificate. In exceptional cases, the Recognised organisation (RO) can be authorised to carry out an audit and/or issue the corresponding DOC certificate on behalf of the BMI. Therefore, audits carried out and certificates issued by either the BMI or the mentioned RO are to be considered valid. The issuing body may be different from the auditing body. To avoid problems with Port State Control, it is urged to mention here 'Government of Belgium Federal Public Service Mobility & Transport', as well as the Recognised organisation who carried out the audit and/or issued the DOC (only in exceptional cases). It is to be noted that in principle the BMI issues the DOC.
- f) Administration/Government/ Recognised organisation which issued Safety Management certificate (SMC):

According to the Belgian audit policy, ISM audits can be carried out either by the Belgian Maritime Inspectorate (BMI) or by the RO on behalf of the BMI. The SMC certificate can therefore be issued by the BMI as well as by the mentioned RO. Therefore, audits carried out and certificates issued by either the BMI or the mentioned RO are to be considered valid. The issuing body may be different from the auditing body. It should be noted that in principle the BMI issues the SMC.

To avoid problems with Port State Control, it is urged to mention here 'Government of Belgium Federal Public Service Mobility & Transport', as well as the Recognised organisation who carried out the audit and/or issued the SMC.

g) Administration/Government/ Recognised security organisation (RSO)which issued International Ship Security certificate (ISSC):

According to the Belgian audit policy, ISPS audits can be carried out either by the Belgian Maritime Inspectorate (BMI) or by the RSO on behalf of the BMI. The ISSC certificate can therefore be issued by the BMI as well as by the mentioned RSO. Therefore, audits carried out by and certificates issued by either the BMI or the mentioned RSO are to be considered valid. The issuing body may be different from the auditing body. It should be noted that in principle the BMI issues the ISSC.

To avoid problems with Port State Control, it is urged to mention here 'Government of Belgium Federal Public Service Mobility & Transport', as well as the Recognised security organisation who carried out the audit and/or issued the ISSC.

On board each CSR Form 2 is to be attached to the CSR Form 1 which relates to changes intended for that particular CSR Form 1. All the CSR Forms 2 need to stay on board.

### C. CSR Form 3 – Index of amendments to Continuous Synopsis Record

Whenever a CSR Form 2 is attached to the ship's current CSR Form 1, details of the amendment(s) have to be entered in the 'Index of amendments to the Continuous Synopsis Record' (CSR Form 3) on board in date order and attached to the current CSR Form 1 on board.

The CSR Form 3 enlists in an index all amendments to the Continuous Synopsis Record (specified by amendment forms) relating to the previous CSR document and attached to CSR Form 1.

The format of the form 3 can be found in annex.

### III. Issuance of CSR

## A. New build ships registering with the Belgian Ship Register

In order for the BMI to prepare the ship's first CSR, the information required in CSR Form 1 must be provided as soon as is practically possible using the CSR Form 2.

#### B. Ships transferring to the Belgian Ship Register

#### 1. Previous flag

When a ship is transferred to the Belgian Ship Register, it is advisable to complete at least boxes 1, 15 and 16 on CSR Form 2 and send it to the previous flag administration so that they can issue their final CSR document.

#### 2. Belgian flag

When a ship is transferred to the Belgian Ship Register, CSR Form 2 must be completed and sent to the BMI. The BMI will issue a new CSR form 1 with the next consecutive number to be attached to the record on board.

While the ship is under the Belgian flag, the BMI holds a copy of the entire CSR history file of the ship. Please note that the BMI often experiences long delays in receiving the ship's CSR file from the losing flag administration. It would be helpful if the ship could provide the BMI with a complete copy of its CSR file when it transfers to Belgian flag. **The originals must be kept onboard**.

# C. Possibility of Inconsistencies

On receipt of a revised and updated CSR Form 1, the master should check its sequential number and review the document to ensure that it covers the amendments mentioned on the Form 2 and Form 3 attached to the previous CSR Form 1.all relevant amendment forms attached to the previous CSR Form 1.

In case this review establishes that there are outstanding amendments not reflected in the latest CSR Form 1, the master should do the following:

- a) complete new CSR Form(s) 2 relating to each outstanding amendment and attach it to the latest CSR Form 1;
- b) list the amendment(s) referred to in a) above in the index of amendments (CSR Form 3) attached to the latest CSR document; and
- c) forward copies of the CSR Form(s) 2 to the BMI.

The ship is required to maintain the CSR by keeping every CSR Form 1, sequentially numbered, issued by the ship's flag state.

If inconsistencies are identified, it must be assessed why there are inconsistencies before action is taken based solely on the view that an inconsistency exists.

#### D. Leaving the Belgian Ship Register

Apart from completing the procedure to remove the ship from the Belgian Ship Register, the BMI must be notified of the name of the new Flag Administration and the date of the flag change, by completing boxes 1, 15 and 16 on CSR Form 2.

As soon as possible after the transfer date, the BMI will issue the closing BMI CSR through Navicert, and will forward a copy of the ship's complete CSR file to the new Flag Administration.

When flagging out, it is advisable to verify that all the CSRs in Navicert are available in the ship's file as the shipowner will no longer have access to the certificates in Navicert shortly after flagging out.

# IV. Lost, damaged or illegible documents

If, for any reason, any ship's CSR records are lost, damaged or illegible, it is essential that they are restored as quickly as possible. BMI is to be contacted in writing as quickly as possible with the list of the papers lost or damaged in order to provide duplicates.

### V. Contact

The BMI can be contacted at: FOD Mobiliteit en Vervoer

DG Scheepvaart

Scheepvaartcontrole - Dienst Vlagstaat (BMI)

Entrepotplaats 1 bus 7 2000 Antwerpen

Belgium

Ship.Belflag@mobilit.fgov.be

## VI. Annex

The CSR Form 2 and the CSR Form 3 can be found on <a href="https://mobilit.belgium.be/en/shipping/maritime-shipping/ship-flying-belgian-flag/bmi-circulars">https://mobilit.belgium.be/en/shipping/maritime-shipping/ship-flying-belgian-flag/bmi-circulars</a>.

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The completed forms should be sent to <a href="mailto:Ship.Belflag@mobilit.fgov.be">Ship.Belflag@mobilit.fgov.be</a>.