



ST KITTS & NEVIS INTERNATIONAL SHIP REGISTRY

MARITIME CIRCULAR – MC 153 26

ENHANCED OVERSIGHT, STATUTORY SURVEY RIGOR, AND MANDATORY REPORTING – TOKYO MOU PERFORMANCE REVIEW 2025

1. Purpose

1.1. The purpose of this Circular is to advise all Recognized Organizations (ROs) of the enhanced oversight measures, statutory survey requirements, and mandatory reporting obligations necessary to improve the performance of vessels operating under the St. Kitts & Nevis flag.

1.2. This Circular further reinforces the Administration's expectations regarding statutory survey rigor, technical compliance, operational safety, and adherence to applicable international maritime conventions and delegated responsibilities.

2. Applicability

2.1. This Circular applies to all Recognized Organizations (ROs) acting under delegated authority on behalf of the St. Kitts & Nevis International Ship Registry, as well as shipowners, managers, and technical operators.

3. Legal References & Framework

3.1 This Circular shall be read in conjunction with:

- Code for Recognized Organizations
- IMO Instruments Implementation Code (Resolution A.1070 (28))
- ISM Code
- ISPS Code
- MLC 2006
- The St. Kitts and Nevis Merchant Shipping Act

4. Enhanced Oversight & Mandatory Survey Compliance Measures

4.1. Following the publication of the 2025 Tokyo MOU Annual Report, the Administration expresses serious concern regarding the performance of the fleet. In this respect, Recognized Organizations (ROs), acting under delegated authority in accordance with the IMO Instruments Implementation (III) Code, as adopted by IMO Resolution A.1070(28), bear significant responsibility for ensuring and enforcing compliance across the fleet. ROs are therefore expected to effectively carry out their duties in line with this delegation, ensuring that all vessels maintain full compliance with applicable international conventions and standards.

4.2. St. Kitts & Nevis currently remains within the "Low Performance" category with an elevated excess factor, while recent inspection outcomes continue to demonstrate recurring patterns of serious deficiencies. In light of these findings, all Recognized Organizations are hereby instructed to intensify oversight during statutory surveys and ensure stricter compliance verification onboard vessels operating under this flag.

4.3. Consequently, all Recognized Organizations (ROs) are hereby instructed to intensify oversight during statutory surveys. We expect zero tolerance for deficiencies in critical areas, specifically:

- **ISM Code Implementation:** Verification that Safety Management Systems are actively understood and applied onboard, moving beyond mere documentation checks.
- **Fire and Safety Equipment:** Thorough confirmation of the operational readiness and maintenance of all fire extinguishing installations and detection systems.
- **Pollution Prevention:** Strict verification of MARPOL compliance, including oil filtering equipment and ballast water management systems.
- **MLC Compliance:** Increased scrutiny of Maritime Labour Convention requirements, specifically including crew salaries, rest hours, and repatriation protocols, to ensure seafarer welfare and operational safety.

5. Reporting Requirements

5.1. To enable the Administration to take timely and appropriate action, all Recognized Organizations are required to implement the following proactive measures:

- **Immediate Notification:** Inform the Technical Department immediately regarding:
 - Major non-conformities.
 - Serious technical findings.
 - Requesting the authorization for the issuance of Conditional Certificates.
 - Suspension or withdrawal of statutory certificates
- **Timely Reporting:** Ensure that all survey findings, corrective action plans, and supporting documentation are communicated to the Administration without delay.
- **Preventative Action:** Ensure that all identified deficiencies and compliance gaps are fully rectified before issuing or endorsing statutory certificates.

5.2. The Administration emphasizes that full compliance with the above requirements is mandatory and non-negotiable. Any failure to exercise due diligence during statutory surveys, or failure to report deficiencies and non-conformities in a timely and transparent manner, will be considered a serious breach of delegated authority.

5.3. In such circumstances, the Administration reserves the right to take corrective and enforcement measures, including but not limited to:

- Suspension or Cancellation of Auditor, Surveyors, or Inspectors from the list provided by the Recognized Organization.
- Increased oversight and assigned an additional audit of the Recognized Organization's activities, considering the performance reported by the MoU.
- Suspension or restriction of a delegation of authorization for specific services or vessel types.
- Reconsideration of the scope of delegation granted to the Recognized Organization.

5.4. The Administration expects full cooperation and accountability. Continued authorization to act on behalf of the Registry shall remain conditional upon demonstrable adherence to the highest standards of performance, integrity, transparency, and reporting obligations.

5.5. With regard to the performance of Recognized Organizations (ROs) as reported in the Tokyo MoU Annual Report, this Administration wishes to formally communicate that such performance is being closely monitored and carefully assessed. As part of its oversight responsibilities, the Administration may introduce additional follow-up actions where deemed necessary. These actions may include, but are not limited to, on-site audits of the RO, restrictions on the existing delegation of authority, or, where justified, the suspension and/or withdrawal of such delegation.

5.6. Reports and related correspondence to be submitted to enquiries@skanregistry.com or RO@skanregistry.com.

6. Further information and assistance

6.1. The Administration remains committed to strengthening maritime safety, environmental protection, regulatory compliance, and seafarer welfare across the Registry.

6.2. The Administration expects full cooperation, accountability, and professionalism from all Recognized Organizations in supporting efforts to improve the Registry's standing within the international maritime community.

6.3. Should clarification or further assistance be required, Recognized Organizations are encouraged to contact the Administration directly. If you have any questions, please contact this office at enquiries@skanregistry.com or RO@skanregistry.com.

7. Validity and supersession

7.1. This Circular shall enter into force on the date of its issuance and shall remain valid until amended, withdrawn, or superseded by a subsequent Marine Circular, notice, instruction, or other formal direction issued by the Administration.

7.2. This Circular shall be reviewed by the Administration from time to time and may be revised as necessary to reflect amendments to applicable international instruments, changes in the Administration's oversight framework, or operational requirements relating to Recognized Organizations.

7.3. The issuance of this Circular does not relieve any Recognized Organization, shipowner, or technical manager from complying with any applicable convention requirement, statutory obligation, or specific direction issued by the Administration in relation to an individual vessel or case.

CONTROL OF CHANGES

VERSION NUMBER	REVISION	DATE AMENDED	AMENDMENTS
1.0	0	22/05/2026	Initially issued