



ST. KITTS & NEVIS INTERNATIONAL SHIP REGISTRY

MARITIME CIRCULAR – MC 155 26

MANDATORY REPORTING OF SHIP-TO-SHIP TRANSFER (STS) OPERATIONS

To: All Shipowners, Ship Managers, Operators, Masters and Recognized Organizations of St. Kitts & Nevis flagged vessels.

1. Purpose

The purpose of this Circular is to establish a mandatory advance reporting requirement for ship-to-ship (STS) operations involving the transfer of oil cargo between oil tankers flying the St. Kitts and Nevis flag.

This measure is adopted as part of the Administration's oversight of STS activities and in support of international efforts to prevent unsafe, deceptive, illicit, or sanction-evasive maritime practices associated with the so-called "dark fleet" or "shadow fleet".

2. Applicability

This Circular applies to oil tankers of 150 gross tonnage and above, registered under the St. Kitts and Nevis flag, engaged in ship-to-ship (STS) transfer operations involving oil cargo, regardless of location.

This Circular does not apply to:

- Oil transfer operations associated with fixed or floating platforms, including drilling rigs, FPSOs and FSUs used for offshore production or storage of oil.
- STS operations necessary for securing the safety of a ship or saving life at sea, or for combating specific pollution incidents in order to minimize damage from pollution.
- STS operations involving warships, naval auxiliaries, or other ships owned or operated by a State and used, for the time being, only on government non-commercial service.

3. Legal References and Framework

- a) MARPOL 73/78, Annex I, Chapter 8, as amended by Resolution MEPC.186(59), concerning ship-to-ship (STS) transfer operations of oil cargo between oil tankers at sea.
- b) IMO Resolution A.1192(33), "Urging Member States and all relevant stakeholders to promote actions to prevent illegal operations in the maritime sector by the 'dark fleet' or 'shadow fleet'".

4. Reporting Requirements

With effect from 1 July 2026, every STS operation falling within the scope of this Circular shall be notified to the Administration at least 24 hours before the intended commencement of the operation.

The notification shall be submitted by email to: STS@skanregistry.com

<https://www.SKANRegistry.com>



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The notification shall include, at a minimum:

- Name, IMO number, and flag of the St. Kitts and Nevis-flagged vessel.
- Name, IMO number, and flag of the counterpart vessel or vessels, where available.
- Geographic location of the intended STS operation, including coordinates where available.
- Estimated date and time of commencement of the operation.
- Type of oil cargo and approximate quantity to be transferred.
- Confirmation that the vessel carries an approved STS Operations Plan and that the operation will be conducted in accordance with that Plan and applicable international guidance.

Where an STS operation is cancelled, postponed, or materially changed, an updated notification shall be submitted to the Administration without delay.

4.1 Compliance

In accordance with MARPOL 73/78, Annex I, Chapter 8, any oil tanker of 150 gross tonnage and above engaged in STS operations shall carry on board an approved STS Operations Plan prescribing how such operations are to be conducted.

The STS Operations Plan shall be developed taking into account applicable IMO requirements and recognized best-practice guidance for STS operations, and all operations shall be conducted in accordance with the approved Plan.

Records of STS operations and related oil cargo transfer operations shall be maintained on board in accordance with MARPOL requirements and shall be made available for inspection by the Administration or any duly authorized authority upon request.

Failure to comply with this Circular, or with applicable international requirements governing STS operations, may result in administrative action by the Administration and may affect the vessel's compliance status under the St. Kitts and Nevis flag.

4.2 Additional Guidance

Shipowners, operators, managers and Masters are reminded to exercise enhanced due diligence in the planning and conduct of STS operations, particularly where such operations may involve heightened geographical, commercial, sanctions-related, or operational risk. The Administration further reminds all parties that deceptive shipping practices, including those

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associated with sanction evasion, may expose vessels and related parties to serious regulatory, commercial, and reputational consequences.

Recognized Organizations and other relevant parties acting on behalf of the Administration are requested to support the implementation of this Circular within the scope of their delegated functions and to report any significant non-conformities identified during surveys, audits, or inspections.

5. Further Information and Assistance

Any questions concerning this Circular or the reporting of STS operations should be directed to the St. Kitts and Nevis International Ship Registry at STS@skanregistry.com

6. Validity and Supersession

This Circular shall enter into force on 1 July 2026 and shall remain in effect until amended, withdrawn, or superseded by the Administration.

7. Control of MC Changes

Document Version	Date	Details of Change
00	06/09/2026	Initial Issue



MANDATORY SHIP-TO-SHIP (STS) TRANSFER ADVANCE NOTIFICATION FORM

Submission Instruction: In accordance with Marine Circular MC 155 26, this notification form must be completed in full and submitted via email to **STS@skanregistry.com** at least twenty-four (24) hours prior to the commencement of any intended STS operation.

1. ST. KITTS AND NEVIS FLAGGED VESSEL PARTICULARS

Vessel Name:	
IMO Number:	
Gross Tonnage (GT):	

2. COUNTERPART VESSEL PARTICULARS

Counterpart Vessel Name:	
IMO Number:	
Flag State:	

3. INTENDED OPERATION DETAILS

Geographic Location / Port:	
Coordinates (Lat / Long):	
Estimated Date & Time of Commencement:	<i>[Specify UTC or Local Time]</i>
Type of Oil Cargo:	
Approximate Quantity to Transfer:	<i>[Specify Metric Tons or Barrels]</i>



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4. COMPLIANCE & SAFETY DECLARATION

☐	The vessel carries on board an approved STS Operations Plan prescribing how such operations are to be conducted, in full compliance with MARPOL Annex I, Chapter 8.
☐	The intended operation will be conducted strictly in accordance with the approved Plan and applicable international safety and best-practice guidance.
☐	The Master, Shipowners, and Operators confirm that enhanced due diligence has been exercised concerning the planning of this operation, specifically assessing geographical, commercial, operational, and sanctions-related risks.