



CAPITAL REGISTER OF SHIPPING

Technical Information

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MANDATORY CORRECTIVE ACTION PLANS FOR FLAG STATE INSPECTION AND PORT STATE CONTROL DEFICIENCIES

Reference: SKN Maritime Circular MC 164 26 (Version 00), Dated 31 August 2026

To: All Owners, Operators, Technical/ISM Managers, Masters, DPAs and Recognized Organizations of St. Kitts & Nevis-flagged vessels

With effect from 15 September 2026, the St. Kitts & Nevis International Ship Registry (SKAN Reg) requires a Corrective Action Plan (CAP) to be prepared and submitted for every Flag State Inspection (FSI) or Port State Control (PSC) inspection that records one or more deficiencies, as set out in Maritime Circular MC 164 26. This Technical Note highlights the key requirements and the actions expected from Companies and vessels.

1. Scope and Applicability

The Circular applies to all ships on the St. Kitts & Nevis International Ship Registry and covers every FSI or PSC report containing deficiencies: non-detainable and detainable deficiencies, deficiencies rectified during the inspection, deficiencies given a rectification period or condition, and inspections resulting in detention. The number, severity, category or risk level of the deficiencies does not change the requirement.

Responsibility rests with the Company, shipowner, operator, technical manager, ISM manager, Master, DPA and relevant shipboard personnel and, for its delegated statutory functions or attendance, the Recognized Organization (RO). The Circular is to be read with the SKN Merchant Shipping Act Cap. 7.05, IMO Resolution A.1185(33), SOLAS (including Chapter IX), the ISM Code, MARPOL, MLC 2006, the RO Code and the III Code.

2. Content of the CAP

No deficiency is exempt: a CAP is required **even if the deficiency was closed during the inspection** or rectified before departure. Each finding must be dealt with separately, and a combined generic reply is not accepted unless SKAN Reg agrees in writing. Companies may

NOTES:

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use their own format or **SKAN Reg Form OP-PSC-F-01 (Rev. 00)**, which can be downloaded from the SKAN Reg Downloads Directory (www.skanregistry.com/en/downloads-directory).

As a minimum, each deficiency entry should show: the FSI/PSC report and deficiency reference numbers; deficiency category and regulatory reference; the description as worded in the report; risk assessment and potential impact; immediate corrective action; root-cause and contributing-cause analysis; corrective and preventive actions; the responsible person (rank or shore position); target and actual completion dates; objective evidence (e.g. photographs, test and service reports, PMS records, work orders, class/RO reports, revised procedures, training records); verification of effectiveness (method, verifier, review date, results); and approval by the Company.

3. Review, Detention and Case Closure

SKAN Reg will assess whether each deficiency is individually addressed, causes have been analysed, preventive measures are proportionate, responsibilities and deadlines are clear and the evidence supports the reported status. Incomplete or unsupported CAPs may lead to requests for clarification, a revised CAP or further evidence. Where findings indicate SMS failure, repeated non-conformities, poor maintenance or ineffective earlier corrective actions, SKAN Reg may require an additional FSI, RO attendance, or SMC/DOC audit.

- On issue of a PSC detention notice, the Company and the RO (where applicable) must notify SKAN Reg immediately and promptly provide confirmation of detention, the full PSC report, deficiency list and detention notice, a completed or proposed CAP covering all deficiencies, and the planned release arrangements.
- Detentions are treated as high priority. A detention case is closed only after evidence of release, rectification of all deficiencies, completion of any required FSI, RO attendance or audit, and acceptance of the CAP and preventive measures.

Item	Requirement
Entry into force	15 September 2026; remains valid until amended, withdrawn or superseded
When a CAP is needed	Every FSI or PSC inspection with one or more deficiencies, including those rectified during the inspection and those resulting in detention
Submission (non-detained)	CAP and supporting evidence within the timeframe given in the FSI/PSC report or as specified or communicated by SKAN Reg
Fleet-wide review	Company to assess whether a finding affects other vessels, equipment, procedures, PMS routines or SMS arrangements and extend corrective and preventive action accordingly
Flag contact	SKAN Reg Technical Department – technical@skanregistry.com

4. Recommended Actions

Companies should circulate MC 164 26 to shore and shipboard staff and incorporate the CAP requirement into SMS procedures for PSC and FSI response. Masters should forward inspection reports, deficiency lists, rectification evidence and related correspondence to the Company without delay, and the DPA and technical management should ensure that CAPs address the underlying cause of each finding rather than merely recording it as “rectified” or “closed”. Completed CAPs and evidence should be retained for verification at subsequent inspections and audits.

For clarification on any of the above, please reach out to:

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