



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

Reference: SKN Maritime Circular MC 153 26, Dated 22 May 2026

To: All Recognized Organizations (ROs), Shipowners, Managers and Technical Operators of Saint Kitts and Nevis-flagged vessels

The St. Kitts and Nevis International Ship Registry (SKAN Reg) has issued Maritime Circular MC 153 26 on 22 May 2026, advising all Recognized Organizations (ROs) of enhanced oversight measures, statutory survey requirements and mandatory reporting obligations necessary to improve the performance of vessels operating under the St. Kitts & Nevis flag, following the 2025 Tokyo MOU Annual Report. This Technical Note summarises the principal points of the Circular for information.

1. Background

Following publication of the 2025 Tokyo MOU Annual Report, St. Kitts & Nevis currently remains within the “Low Performance” category with an elevated excess factor, and recent inspection outcomes continue to demonstrate recurring patterns of serious deficiencies. Recognized Organizations, acting under delegated authority in accordance with the IMO Instruments Implementation (III) Code (Resolution A.1070(28)), bear significant responsibility for ensuring and enforcing compliance across the fleet.

2. Enhanced Oversight and Zero-Tolerance Areas

All Recognized Organizations are instructed to intensify oversight during statutory surveys, with zero tolerance for deficiencies in ISM Code implementation, fire and safety equipment, pollution prevention (MARPOL compliance including oil filtering equipment and ballast water management), and MLC compliance (crew salaries, rest hours and repatriation protocols).

3. Reporting and Enforcement

Recognized Organizations must provide immediate notification of major non-conformities, serious technical findings, requests for Conditional Certificate authorisation, and suspension or withdrawal of statutory certificates, and must ensure timely reporting of survey findings and corrective action plans. Failure to exercise due diligence or to report deficiencies in a timely and transparent manner will be considered a serious breach of delegated authority, and may result in suspension or cancellation of surveyors/auditors, increased oversight, restriction of delegated authorisation, or reconsideration of the scope of delegation.

NOTES:

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- Zero tolerance applies to deficiencies in ISM Code implementation, fire and safety equipment, pollution prevention, and MLC compliance.
- Major non-conformities, serious technical findings and Conditional Certificate requests must be reported immediately to the Technical Department.

Requirement	Effective Date / Status
Statutory survey compliance verification	Intensified oversight required across ISM, fire/safety equipment, pollution prevention and MLC areas
Major non-conformities or serious technical findings	Immediate notification to the Technical Department
Failure to exercise due diligence or report deficiencies	Considered a serious breach of delegated authority; may result in suspension/restriction of RO delegation

4. Action Required

Recognized Organizations should intensify statutory survey oversight in line with the zero-tolerance areas identified, ensure immediate and timely reporting of non-conformities and certificate actions, and maintain full cooperation, accountability and transparency with the Administration. Reports and correspondence should be submitted to enquiries@skanregistry.com or RO@skanregistry.com.

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

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