ST KITTS & NEVIS INTERNATIONALSHIP REGISTRY

MARITIME CIRCULAR - MC 162- 26
AUTHORIZATION OF P&I CLUBS AND OTHER INSURERS FOR COMPULSORY LIABILITY INSURANCE

1. Purpose

1.1 This Circular sets out the requirements and process for the recognition and authorisation by the St. Kitts & Nevis International Ship Registry ("SKANReg" or "the Administration") of Protection and Indemnity (P&I) Clubs and other insurers, including their representatives, that seek to provide compulsory liability insurance for ships flying the flag of St. Kitts & Nevis.

1.2 The purpose of this Circular is to ensure that certificates of insurance or other financial security required under applicable international conventions are supported by insurers that have been assessed by the Administration as financially sound, properly authorised, and capable of meeting their liabilities.

1.3 Authorisation under this Circular is limited to compulsory third-party liability insurance and related financial security required by the applicable conventions. It does not constitute approval of hull and machinery, war-risk, or other non-liability insurance products.

2. Applicability

2.1 This Circular applies to all P&I Clubs, insurers, insurance companies and, where applicable, their representatives seeking initial recognition or continued authorisation by the Administration to issue insurance documentation in support of statutory certificates for St. Kitts & Nevis-flagged ships.

2.2 This Circular applies to insurance and financial security required, as applicable, under:

a) the International Convention on Civil Liability for Oil Pollution Damage, 1992, as amended (1992 CLC);

b) the International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001 (Bunkers Convention);

c) the Nairobi International Convention on the Removal of Wrecks, 2007 (Nairobi WRC);

d) the Maritime Labour Convention, 2006, as amended (MLC, 2006); and

e) any other compulsory liability insurance or financial-security requirement that the Administration may determine applicable.

2.3 Owners, operators, managers and agents of St. Kitts & Nevis-flagged ships shall ensure that any insurer proposed in support of an application for a Convention certificate has been authorised by the Administration, where such authorisation is required.

2.4 The Administration may refuse, condition, suspend or withdraw an insurer's authorisation where the insurer does not meet, or no longer meets, the applicable requirements.

3. Legal References and Framework

3.1 This Circular is issued under the authority of the Saint Christopher & Nevis Merchant Shipping Act, Cap. 7.05, and applicable subsidiary legislation, as amended.

3.2 This Circular shall be read in conjunction with:

a) the International Convention on Civil Liability for Oil Pollution Damage, 1992, as amended;

b) the International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001;

c) the Nairobi International Convention on the Removal of Wrecks, 2007;

d) the Maritime Labour Convention, 2006, as amended;

e) IMO Circular Letter No. 3464, concerning guidance on the implementation of financial-security requirements under the Athens Convention, the Bunkers Convention and the Nairobi WRC;

f) the revised IMO guidance on the implementation of financial-security requirements approved by the IMO Legal Committee at its 111th session (LEG 111), 2024;

4. Instructions

4.1 Application for authorization

4.1.1 An insurer seeking authorisation shall submit a completed SPB-001 application form/checklist and supporting documents to the Compliance Department at compliance@skanregistry.com.

4.1.2 The application shall include a formal request stating:

a) the full legal name and registered address of the insurer;

b) the name and contact details of the responsible representative or contact person;
c) the convention(s) for which authorisation is requested; and
d) whether the application concerns the insurer directly, a branch, a representative, or a subsidiary proposed to be included within the authorisation.

4.2 Required supporting evidence

4.2.1 Applicants shall provide the information and documentation specified in SPB-001, including, as applicable:

a) certificate of incorporation, valid operating or business licence, and certificate of good standing, incumbency or equivalent evidence of legal status;

b) evidence of authorisation by the competent authority responsible for the supervision of insurance business in the insurer's jurisdiction;

c) company profile, ownership and management structure, including details of subsidiaries or representatives included in the application;

d) evidence of experience in marine liability insurance;

e) policy terms or evidence of cover for relevant maritime claims;

f) audited financial statements for the preceding three consecutive years, demonstrating financial standing and solvency;

g) information on claims reserves;

h) reinsurance arrangements, including reinsurer details and cedant limits, where applicable;

i) a guarantee from the insurer and, where applicable, its parent company, confirming coverage of liabilities up to the limits required by the relevant Convention or, for the Bunkers Convention and Nairobi WRC, the limits under the Convention on Limitation of Liability for Maritime Claims, 1976, as amended;

j) a written confirmation that liability arising from an act of terrorism under the relevant Convention is covered;

k) current ratings issued by an independent internationally recognised rating agency for the insurer and, where applicable, its reinsurer(s). The minimum rating for reinsurers is BBB+, unless otherwise determined by the Administration;

l) templates of blue cards and certificates proposed for use;

m) a letter of undertaking to comply with the Saint Christopher & Nevis Merchant Shipping Act, Cap. 7.05;

n) copies of approvals issued by other flag Administrations, where available;

o) evidence of the ability to provide a bank guarantee and/or Letter of Undertaking, where required; and

p) any additional information or documents requested by the Administration.

4.3 Assessment and decision

4.3.1 The Compliance Department will assess the completeness, validity and adequacy of the submitted documentation, including the applicant's financial standing, regulatory status, reinsurance arrangements, guarantees, and ability to meet Convention liabilities.

4.3.2 The Administration will conduct appropriate due diligence and sanctions screening of the applicant, its parent company where applicable, reinsurers, and relevant key persons.

A confirmed sanctions concern will result in refusal of authorisation.

4.3.3 The Administration may request further information, clarification, updated evidence, or additional guarantees before a decision is made.

4.3.4 Authorisation is granted solely at the discretion of the Administration. The decision of the Administration will be communicated in writing.

4.3.5 An authorised insurer may issue blue cards or equivalent evidence of insurance only within the approved scope and for the applicable Convention(s). The issue of a statutory Convention certificate remains subject to the Administration's separate review and issuance process.

4.4 Ongoing obligations

4.4.1 An authorised insurer shall promptly notify the Administration of any material change that may affect its continued eligibility, including:

a) suspension, restriction, expiration or withdrawal of its insurance licence or regulatory approval;

b) a material deterioration in financial standing, solvency, credit rating or claims-paying ability;

c) material changes to ownership, parent-company support, reinsurance arrangements or insurance cover;

d) sanctions, enforcement action, insolvency proceedings or other material regulatory action; and

e) changes to its contact details, representatives, approved branches, templates, or scope of insurance cover.

4.4.2 The Administration may conduct periodic reviews and request updated financial statements, ratings, regulatory approvals, guarantees, reinsurance evidence or other documents at any time.

4.4.3 Failure to provide requested information, or failure to maintain the conditions of authorisation, may result in suspension or withdrawal of authorisation.

5. Further Instructions and Assistance

5.1 The current application checklist, SPB-001, shall be used for all applications and may be obtained from the Compliance Department or the Registry’s official website.

5.2 Questions concerning insurer authorisation, supporting evidence, continued eligibility, or approval status should be submitted to:

Compliance Department
St. Kitts & Nevis International Ship Registry
Email: compliance@skanregistry.com

5.3 Owners, managers and agents seeking statutory Convention certificates should ensure that complete and valid insurance documentation is submitted sufficiently in advance of the required certificate issue date.

6. Validity and Supersession

6.1 This Circular enters into force on September 1st, 2026.

6.2 This Circular remains valid until amended, revoked or replaced by the Administration.

6.3 The Administration may amend this Circular to reflect changes to applicable legislation, IMO instruments, financial-security guidance, sanction requirements, or internal Registry processes.

7. Control of MC Changes

Document Version	Date	Details of Change
00	12/08/2026	Initial issue