



FLAG STATE REQUIREMENTS SUMMARY

ST KITTS & NEVIS

DECEMBER 2024



OBJETIVE

The objective of this document is to provide QRS surveyors and staff with the specific requirements, instructions, clarifications, etc., issued by the Flag State Administration (FSA) of the flag in reference, to assist them in carrying out the necessary surveys and issue the relevant Interim/Short Term Certificates as authorized, or proceed with the endorsement of Full-Term Certificates, as the case may be. These requirements derive from the different Resolutions, Marine Circulars (MC), and instructions that have been issued by the SKAN.

This document is also a reference also for QRS HO for reviewing of technical documentation.

SCOPE

This procedure is applicable to all survey and certification activities carried out on behalf of the Flag State Administration of ST KITTS & NEVIS.

DESCRIPTION OF REQUIREMENTS

-The official name to be placed in the certificates issued on behalf of the FSA is ST KITTS & NEVIS SHIP REGISTRY.

-Specific requirements, flag state guidelines, and interpretations are generally published as Marine Circulars

-(MC), some of which are designated to carry the weight of rules and regulations.

These are issued periodically and are available at www.skanregistry.com/en/maritime_circulars.



MC 127- 24, March 2024

Procedure to be followed for the application for an exemption / dispensation from, an extension of and / or acceptance of an equivalent arrangement to, an international convention requirement

This circular provides the necessary steps for requesting an exemption/dispensation, an extension, and/or the acceptance of an equivalent arrangement to comply with an International Convention requirement.

To request an exemption, **Form A16** must be completed by following the link <https://www.skanregistry.com/en>. The form must be filled out with the following details:

- The Convention and regulation to be exempted.
- The reasons for the exemption.
- The requested time period.
- Any conditions or alternatives that must be met to fulfill the exemption.

Such exemptions can only be issued by the St. Kitts and Nevis International Ship Registry. Recognized Organizations must report if a statutory certificate directly affecting the exemption is canceled.

MC 128 – 24, March 2024

Oversight program for SKAN recognized organizations as per the requirements of the RO Code

The purpose of this Maritime Circular is to provide information about the oversight program established by this Administration for the Recognized Organizations (ROs), to verify compliance with the applicable international instruments.

As of January 1, 2023, the oversight program for ROs came into effect, in which the RO Code is applied to all Recognized Organizations without exception.

Recognized organizations are subject to an initial audit, whether existing or new, and a renewal audit must be conducted every 4 years.

According to the Administration, ROs may be subject to annual audits equivalent to a renewal audit, as well as additional audits if the following conditions are met:

- a) A vessel under its supervision has been subject to two or more detentions by port state control within a 12-month period.
- b) Vessels have been detained in major MoU regions and there has been an increase in the RO's excess factor regarding inspections performed and detentions made.
- c) Inspections on vessels determine that an identified defect is attributed to the RO as "RO Responsible."

MC 129 – 24, April 2024

Garbage record book for ships of 100 GT and above

It proposes a reminder to be aware of the new mandatory measures adopted by the IMO for the prevention of pollution from garbage coming from ships.

Resolution **MEPC.320(79)** adopted amendments to **Annex V, Reg 10.3 of MARPOL** regarding the Garbage Record Book.

The following requirements must be met:

- Ships of 100 GT or more, or any ship carrying 15 or more persons on voyages to ports or offshore terminals, must have a Garbage Record Book.
- Operations must be recorded: disposal and incineration, discharge or loss due to damage to the ship or its equipment (for ships under 100 GT, it must be recorded in the ship's official logbook, according to **Reg 7 of Annex V of MARPOL**).

Exemptions from the Garbage Record Book requirements may apply to:

- Passenger ships carrying 15 or more persons on voyages of less than one hour, and fixed or floating platforms.

A standard form for the Garbage Record Book can be found in **Appendix 2 of Annex V of MARPOL**

MC 130 – 24, June 2024

**Revised template of the declaration of maritime labour Compliance
PART I (DMLC PART I)**

The purpose is to inform you about the new revised template of the Declaration of Maritime Labour Compliance Part I, introduced as a result of the legalized amendments to the MLC Convention.

The aspects that were modified in the DMLC Part I document are as follows:

- **4. Seafarer Employment Agreements (Regulation 2.1)**

Regulation 7 of the Merchant Shipping (Maritime Labour Convention 2006) Regulations 2013, as amended by Regulation 4 of the Merchant Shipping (Maritime Labour Convention 2006) (Amendment) Regulations, 2023

- **11. Health, safety and accident prevention (Regulation 4.3)**

Regulation 19 of the Merchant Shipping (Maritime Labour Convention 2006) Regulations 2013, as amended by Regulation 7 of the Merchant Shipping (Maritime Labour Convention 2006) (Amendment) Regulations, 2023

- **15. Financial Security for repatriation (Regulation 2.5)**

Regulation 5 of the Merchant Shipping (Maritime Labour Convention 2006) (Amendment) Regulations, 2023

- **16. Financial Security for shipowners liability (Regulation 4.2)**

Regulation 6 of the Merchant Shipping (Maritime Labour Convention 2006) (Amendment) Regulations, 2023

The template will be valid for 5 years from the date of issue. Existing DMLC Part I documents must be renewed.

MC 133 – 24, August 2024

Joint concentrated inspection campaign on ship lifting appliances by Riyadh MoU

From the date of issuance of this circular, all ships under the flag of Saint Kitts and Nevis, regardless of their size, and engaged in international voyages or operating from a port or between ports in a country other than Saint Kitts and Nevis, must:

- Have the DMLC Part I
- Have financial security documents in accordance with the requirements of **Regulations 2.5 and 4.2 of the MLC, 2006**, as amended.

These documents must be sent to the Administration, and a certificate must be issued, which must be carried on board the ship. Non-compliance may result in the issuance of a movement restriction notice in accordance with **UNCLOS Article 217**.

MC 132 – 24, August 2024

Joint concentrated inspection campaign on crew ages and seafarer employment agreements (MLC, 2006) By Paris MoU and Tokyo MoU

This Maritime Circular informs about a joint Concentrated Inspection Campaign (CIC) on:

- **Crew wages and**
- **Seafarer employment agreements (MLC, 2006),**

Announced by the member authorities of the Paris and Tokyo Memoranda of Understanding.

The campaign aims to raise awareness about crew wage and employment agreement requirements and verify compliance with these requirements on ships. It will run for three months, **from September 1 to November 30, 2024**, during regular Port State Control inspections.

This Maritime Circular informs about a joint Concentrated Inspection Campaign (CIC) on ships' lifting appliances, announced by the member authorities of the Riyadh Memorandum of Understanding (RMOU) on August 11, 2024.

The campaign's goal is to ensure that crew members are:

- Properly trained
- Can identify hazards in a timely manner
- Know emergency procedures
- Have the necessary qualifications
- Have access to up-to-date safety manuals, and
- Perform periodic maintenance on lifting equipment.

The campaign will run for three months, **from September 1 to November 30, 2024**, as part of regular Port State Control inspections.

MC 134 – 24, November 2024

Early application of the amendments to SEEMP PART II and reporting of revised ship fuel oil consumption data

The purpose of this Maritime Circular is to inform that ships flying the flag of Saint Kitts & Nevis should implement, on a voluntary basis, the amendments to Appendix IX of MARPOL Annex VI starting from January 1, 2025, ahead of the official implementation date.

The amendments adopted in resolutions **MEPC.1/Circ.913** and **MEPC.385(81)** are set to enter into force on August 1, 2025.

MEPC.1/Circ.913 provides information regarding the inclusion of data in the IMO Ship Fuel Consumption Database (IMO DCS). Data for each year must be collected and reported with the same level of granularity, and each vessel must ensure that its Ship Fuel Oil Consumption Data Collection Plan (Part II) of the SEEMP is updated.

MEPC.385(81) all vessel fuel consumption data for the same calendar year must be collected and reported at the same level of granularity, meaning that the amended data set must be reported as of January 1, 2026.

MC 135 – 24, November 2024

List of national operational contact points for SOPEP and SMPEP

Remind ships under the flag of St. Kitts and Nevis about the obligation to update the SOPEP and SMPEP of their vessels with the most recent version of the IMO list of national operational points of contact for pollution incidents.

The SOPEP (for ships > 400 GT) and SMPEP (for ships ≥ 150 GT carrying noxious liquid substances) should include the updated list of authorities responsible for receiving and processing pollution reports, as required by IMO.

Resolutions MEPC.54 (32) and MEPC.85 (44), among others, require this periodic update.

Updating the list:

- The list of points of contact is updated quarterly by the IMO (**January 31, April 30, July 31 and October 31**).

This most recent version of the list is attached to the Circular and can also be found on the IMO website e following this link :
<https://www.imo.org/en/ourwork/circulars/pages/cp.aspx>

MC 136 – 24, November 2024

Protocol Of Delivery and Acceptance (PODA)

The purpose of this Maritime Circular is to advise of a change in the procedure for registration of vessels in the St. Kitts and Nevis International Ship Registry. As of the date of this Circular it is required, in addition to the list of documents required to be submitted with the application for registration, that a copy of the duly signed Protocol of Delivery and Acceptance (**PODA**) be submitted along with the notarized bill of sale.

This will be required in the following cases:

- Where a vessel is applying to register in St. Kitts and Nevis and there is a change of ownership at the same time as the change of flag.
- Where a vessel is already registered in St. Kitts and Nevis and there is a change of ownership.
- Where a vessel has changed ownership within the last 12 months from the date the vessel is registered in St. Kitts and Nevis.

The Protocol of Delivery and Acceptance (PODA) format is attached.

PROTOCOL OF DELIVERY AND ACCEPTANCE

KNOW ALL MEN BY THOSE PRESENTS that [] has sold and delivered at _____hours GMT on _____ 2024 at _____, to [], all rights, title and interest in and to one (1) vessel of the name "MV[]" with IMO Number [], together with all equipment as agreed now on board the aforesaid vessel and free of all debts, taxes, mortgages, encumbrances and maritime liens and any other claims whatsoever in accordance with the provisions of the Memorandum of Agreement dated XX XX 202X.

[] hereby accepts delivery, title and risk of and to the aforesaid vessel and do certify that the same is duly delivered in accordance with the provisions of the Memorandum of Agreement dated XX XX 202X.

Name: Designation: For and on behalf of [SELLER]	Name: Designation: For and on behalf of [BUYER]
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MC 137 – 24, November 2024
New e-mail address for technical inquiries

The Maritime Circular reports a change in the communication of technical matters with the International Ship Registry of St. Kitts and Nevis.

From now on, all technical queries should be sent to the new email address technical@SkanRegistry.com. Although the general mail@SkanRegistry.com or individual addresses can still be copied, it is recommended that the new address be used for a faster response.

SOLAS 2025



- Safe mooring operations
- Modernization of the GMDSS
- Watertight integrity
- Watertight doors on cargo ships
- Fault-isolation of fire detection system
- Life-saving appliances
- Safety of ships using LNG as fuel

Towards SOLAS 2026

The 105th session of the IMO's Maritime Safety Committee in April 2022 was the last session to adopt amendments to the 2024 update of SOLAS and the related mandatory codes. Amendments adopted less than 18 months before 1 January 2024 would normally be pushed to the next four-year cycle of entry into force.

The IMO has, however, recognized that the COVID-19 situation has caused delays in some ongoing work and has hence introduced an ad hoc mid-term amendments cycle. The next update of SOLAS will therefore enter into force on 1 January 2026 and will include **amendments adopted before 1 July 2024**.

WHICH AMENDMENTS BECOME EFFECTIVE FROM JANUARY 2024

- Amendments to SOLAS regulation II-1/3-8 to cover mooring arrangements.
- Amendments to SOLAS chapter II-1 concerning doors, hatches and valves which pierce watertight boundaries.
- Amendments to SOLAS chapter II-1, requirements for water level detectors on multiple hold cargo ships other than bulk carriers and tankers
- Amendments to SOLAS Chapter III, the LSA Code and MSC 81(70) as amended, and MSC Circular on voluntary early implementation of the amendments.
- Amendments to Chapter 9 of the FSS Code
- Amendments to FSS Code Chapter 15
- Amendments to the LSA Code paragraph 6.1.1.3 – to allow the use of hand-operated mechanisms for the launching of rescue boats.
- Amendments to IGC code (Paragraph 6.5.3.5) & IGF Code (Paragraph 16.3.3.5) on the use of materials such as aluminum alloys – Welding of metallic materials and non-destructive testing for the fuel containment system.
- Amendments to the IGF Code (Various – including definitions, probability index fv, loading limit, fuel distribution, internal combustion engines, fuel containment system, type C tanks)
- Amendments to the 1988 Load Line Convention; the IBC and IGC Codes and MARPOL Annex I regarding watertight doors on cargo ships
- Amendment to the IGF Code paragraph 6.7.1.1 concerning the regulation for pressure relief system.
- Amendments to the International Maritime Dangerous Goods (IMDG) Code (41-22)

WHICH AMENDMENTS BECOME EFFECTIVE FROM MAY 2024

- Amendments to MARPOL Annex V – Garbage Record Book
- Amendments to MARPOL Annex VI, Appendix IX – Information to be submitted to the IMO Ship Fuel Oil Consumption Database (Regulation 27)
- Amendments to MARPOL Annex VI, Appendix V – Information to be included in the bunker delivery note (Regulation 18.5)
- Amendments to MARPOL Annex VI – Regulation 14 and Appendix VII – Mediterranean Sea Emission Control Area (ECA) for Sulphur Oxides (SOx) and Particulate Matter.

WHICH AMENDMENTS BECOME EFFECTIVE FROM JANUARY 2025

- Amendments to the IMSBC Code - Solid bulk cargoes are added (14 cargoes) and deleted (1 cargo) in Appendix 1 'Individual List of Solid Bulk Cargoes'. They also explicitly identify 'bulk density (as required by SOLAS regulation XII/10)' as one of the cargo information that shippers must provide to ships prior to loading.
- Amendments to BWM Convention – Amendments in relation to the form of “Ballast Water Record Book”

WHICH AMENDMENTS BECOME EFFECTIVE FROM MAY 2025

- Amendments to MARPOL Annex VI in relation to the low-flashpoint fuels and other fuel oil related issues, marine diesel engine replacing a steam system, accessibility of the data in the IMO Ship Fuel Consumption Database (IMO DCS), and inclusion of data on transport work and enhanced level of granularity in the IMO DCS.
- Amendments to BWM Convention in relation to the use of electronic record book.

WHICH AMENDMENTS BECOME EFFECTIVE FROM JANUARY 2026

- Amendments to SOLAS chapter II-2 - The prohibition of using oil fuel with a flashpoint of less than 60°C
- Amendments to SOLAS Regulations.II-1/3-13. Information on new requirements on lifting appliances and anchor handling winches.
- Amendments to SOLAS Prohibition on the use and storage of fire-extinguishing media containing PFOS (SOLAS Reg.II-2/10.11 Fire-extinguishing media restrictions).
- Amendments to SOLAS – Safety measures for non-SOLAS ships operating in the polar waters (SOLAS Reg.XIV/3-1).
- Amendments to SOLAS – Oil fuel quality (SOLAS Reg.II-2/4)
- Amendments to SOLAS - Fire detection and fire alarm system for control stations and cargo control rooms (SOLAS Reg.II-2/7)
- Amendments to SOLAS – Fires safety existing ro-ro passenger ships (SOLAS Reg.II-2/20)
- Amendments to Grain Code - New loading condition for the carriage of grain
- Amendments to IGC Code to permit the use of high-manganese austenitic steel as a cryogenic material having minimum design temperature -165°C.
- Amendments to the LSA Code - Revised recommendation on testing of life-saving appliances, Chapter 4/4.6 ventilation of totally enclosed lifeboats, Chapter 2 In water performance of life jackets, Chapter 6 Lowering speed of survival crafts and rescue boats and Chapter 4 Single fall and hook system for launching lifeboats or rescue boats.