



# ST KITTS & NEVIS INTERNATIONAL SHIP REGISTRY

## MARITIME CIRCULAR – MC 154 26

### MANDATORY ENFORCEMENT ACTIONS, STRATEGIC COOPERATION, AND CREW WELFARE OVERSIGHT

#### 1. Purpose

1.1. The purpose of this Circular is to advise all appointed Flag State Inspectors (FSIs) of the mandatory enforcement measures and enhanced inspection requirements necessary to improve the performance and oversight of vessels operating under the St. Kitts & Nevis flag.

1.2. This Circular also reinforces the Administration's expectations regarding proactive cooperation, technical oversight, crew welfare compliance, and the effective implementation of applicable international maritime conventions.

#### 2. Applicability

2.1. This Circular applies to all appointed Flag State Inspectors (FSIs), as well as Recognized Organizations, shipowners, and technical managers operating vessels under the St. Kitts & Nevis flag.

#### 3. Legal References & Framework

3.1 This Circular shall be read in conjunction with:

- Code for Recognized Organizations
- IMO Instruments Implementation Code (Resolution A.1070 (28))
- ISM Code
- ISPS Code
- MLC 2006
- The St. Kitts and Nevis Merchant Shipping Act
- SOLAS, MARPOL, and other applicable international and national regulations governing Flag State responsibilities.

#### 4. Mandatory Inspection Focus Areas & Flag State Enforcement Measures

4.1. Recent findings reflected in the 2025 Tokyo MOU Annual Report indicate that the performance of the fleet has not demonstrated meaningful improvement. As the flag remains within the low-performance/black-listed categories, immediate corrective action and enhanced inspection activities are required to safeguard the integrity and reputation of the Registry. The Administration therefore directs all Flag State Inspectors to apply stricter inspection standards and increased scrutiny in areas frequently identified as deficiencies during recent Port State Control (PSC) inspections.

4.2. All appointed Flag State Inspectors are instructed to conduct more stringent inspections, focusing heavily on high-deficiency areas identified in recent Port State Control (PSC) reports:

- **Safety of Navigation:** Rigorous verification of bridge discipline, passage planning, and the effective use of navigational systems (ECDIS).

- **Critical Safety Equipment:** Absolute zero tolerance for defects in lifeboats, fire pumps, and emergency systems.
- **Technical Maintenance:** Direct assessment of structural and machinery conditions to address systemic maintenance failures.
- **Crew Performance & Welfare (MLC):** There must be increased scrutiny on crew performance, onboard drills, record-keeping, and overall compliance with the Maritime Labour Convention (MLC). This includes verification of the timely payment of wages, strict adherence to mandated rest hours, and proper implementation of repatriation procedures (when applicable).

4.3. In addition, there has been a noticeable increase in complaints raised by crew members to the International Transport Workers' Federation (ITF) and/or Port State Control (PSC). These complaints primarily relate to non-compliance with MLC requirements, particularly concerning insufficient rest hours and the failure to pay salaries monthly as required under the Convention.

4.4. All Flag State Inspectors are strongly encouraged to maintain proactive and continuous communication with the Technical Department. In cases where any deficiencies or inconsistencies are identified that may affect the vessel's compliance status, the welfare of the crew, and/or environmental protection, we must be notified immediately. Such notifications should be made without delay via email and/or telephone to ensure timely awareness and appropriate corrective actions.

4.5. If an inspector becomes aware of a St. Kitts & Nevis-flagged vessel calling at a port within their region, please notify the Administration immediately. The Technical Department will coordinate with available priority tracking and MOU information to determine whether a Flag State Inspection (FSI) should be assigned.

4.6. While we finalize a centralized vessel tracking process for monitoring inspection due dates, the Administration will continue to rely on the professional cooperation, vigilance, and local intelligence of all inspectors to ensure adequate oversight of the fleet.

4.7. All Flag State Inspectors are expected to perform their duties with the highest level of diligence, integrity, and professionalism. Inspectors must always remain impartial, carefully observing and strictly avoiding any actual or potential conflicts of interest with the vessels under inspection. Furthermore, FSI are responsible for ensuring that all vessels operating under the flag consistently comply with applicable international conventions, regulations, and standards.

4.8. Failure to properly enforce the above requirements, or failure to report deficiencies in a timely and transparent manner, may be considered non-compliance with delegated responsibilities and applicable international obligations. Consequently, the authorization of a Flag State Inspector may be suspended or withdrawn where appropriate.

## **5. Reporting Requirements**

5.1. Timely and accurate reporting of findings and deficiencies at the conclusion of each inspection is essential. Prompt communication with the Technical Department enables the initiation of appropriate preventive and corrective actions by the Owners, Managers, Operators, and the

Administration. Effective reporting ensures that identified issues are addressed without delay, thereby supporting continuous compliance and improving the overall performance of the fleet. Reports and related correspondence to be submitted to [enquiries@skanregistry.com](mailto:enquiries@skanregistry.com) or [FSI@skanregistry.com](mailto:FSI@skanregistry.com).

## **6. Further information and assistance**

6.1. The Administration remains committed to maintaining maritime safety, environmental protection, and seafarer welfare, and expects the full cooperation of all inspectors in restoring and improving the Registry's standing within the international community.

6.2. Should further clarification or assistance be required, inspectors are encouraged to contact the Administration directly at [enquiries@skanregistry.com](mailto:enquiries@skanregistry.com) or [FSI@skanregistry.com](mailto:FSI@skanregistry.com).

## **7. Validity and supersession**

7.1. This Circular shall enter into force on the date of its issuance and shall remain valid until amended, withdrawn, or superseded by a subsequent Marine Circular, notice, instruction, or other formal direction issued by the Administration.

7.2. This Circular shall be reviewed by the Administration from time to time and may be revised as necessary to reflect amendments to applicable international instruments, changes in the Administration's oversight framework, or operational requirements relating to Recognized Organizations.

7.3. The issuance of this Circular does not relieve any Recognized Organization, shipowner, or technical manager from complying with any applicable convention requirement, statutory obligation, or specific direction issued by the Administration in relation to an individual vessel or case.

**Control of Changes**

<b>VERSION NUMBER</b>	<b>REVISION</b>	<b>DATE AMENDED</b>	<b>AMENDMENTS</b>
1.0	0	22/05/2026	Initially issued