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**Maritime Circular to Maritime Registrars, Shipowners, Masters, Managers & Operators of St. Kitts & Nevis Ships, Classification Societies, Recognised Organisations, Recognised Security Organisations, Surveyors of Ships & Flag State Inspectors to this Administration, Seafarers & IMO Member States**

**Maritime Circular No. MC/14/09**

**DATE: 1<sup>st</sup> August 2009**

**APPLICATION OF ISM CODE TO VESSELS USING NATIONAL TONNAGE RULES IN  
EFFECT PRIOR TO COMING INTO FORCE OF ITC 1969**

It is known that certain vessels with keels laid prior to 1<sup>st</sup> January 1986 are allowed to maintain their National Tonnages for compliance with certain regulations. Recently, IMO has decided that tonnages measured according to ITC 69 will apply to these vessels for compliance with SOLAS Chapter XI and the ISM Code.

Attached to this letter is the IMO Circular MSC.1/Circ.1231 entitled "Interim Scheme for the compliance of certain cargo ships and special purpose ships with the management for the safe operations of ships", which details this decision.

Therefore, vessels of 500 GRT (ITC 69) and upwards, on international voyages, irrespective of the date the keel was laid, are required to comply with SOLAS Chapter XI and the ISM Code by 1<sup>st</sup> January 2010.

Owners with vessels that fall into this category should begin implementation of the ISM Code soonest, to avoid a late rush for certification prior to the 1<sup>st</sup> January 2010 deadline.

Yours truly,

**Nigel E Smith**  
*International Registrar of Shipping and Seamen*