# ST KITTS & NEVIS INTERNATIONAL SHIP REGISTRY

# MARITIME CIRCULAR – MC 139 25 (Rev.5)

REVISED MINIMUM SAFE MANNING CERTIFICATE (MSMC)

## 1. Purpose

1.1. The purpose of this Maritime Circular is to inform Maritime Registrars about a revision of the Minimum Safe Manning Certificate (MSMC) conducted by this Administration.

1.2. This Maritime Circular replaces *MC/50/13* issued in May 2013.

## 2. Application

2.1. In accordance with the principles of minimum safe manning as per *IMO Assembly Resolution A.1047(27)*, adopted in 2011, all St Kitts and Nevis registered vessels are required to apply for, and be issued with a Minimum Safe Manning Certificate (MSMC) as part of their process of registering with St Kitts and Nevis International Ship Registry.

2.2. This Administration has conducted a comprehensive review of MSMC taking into consideration the principles of safe manning as stipulated in provisions of SOLAS, the STCW Convention and the requirements of the Maritime Labour Convention 2006 (MLC), including recommendations on crew working hours and rest periods, as well as guidance on preventing abuse and promoting safety in relation to drug and alcohol consumption.

2.3. A copy of the revised *Form A12* on *Application for first issuance, change or renewal of a Minimum Safe Manning Certificate* together with guidelines and manning scales can be found in the annex to this Maritime Circular.

2.4. This Administration invites to share information of this Maritime Circular with all parties concerned, such as Shipowners, Ship Managers, Ship Operators, etc.

If you have any questions, please contact this office at enquiries@skanregistry.com

Yours truly,

Graeme Morkel Digitally signed by Graeme Morkel Date: 2025.07.03 14:59:41 +01'00'

Mr. Graeme Morkel
*Deputy International Registrar of Shipping & Seamen*

# ST KITTS & NEVIS
# INTERNATIONAL SHIP REGISTRY

*The Saint Christopher & Nevis Merchant Shipping Act, Cap. 7.05*
*Department of Maritime Affairs*

## APPLICATION FOR FIRST ISSUANCE, CHANGE OR RENEWAL OF A MINIMUM SAFE MANNING CERTIFICATE

*All ships registered in St. Kitts & Nevis of 24m length and above and all passenger ships of any size are required to carry to Minimum Safe Manning Certificate. Applicants should pay attention to the Minimum Safe Manning Guidelines for Certification (MM1) attached to this Form*

| **VESSEL DETAILS** | | | |
|---|---|---|---|
| *Name of Vessel* | | *IMO or Carib Ship* Number (*where applicable)* | *Official Number (if assigned)* |
| | | | |
| *Type of Vessel* | | *Total Main Engine Power (kW)* | *Intended GMDSS Sea Areas in which the ship will sail (for ships over 300GT)* |
| | | | |
| *Gross Tonnage* | | *Length (as per Tonnage Certificate) (m)* | *Unattended Machinery Space (UMS)* |
| *ITC* | | | **YES** ☐ **NO** ☐ |
| *National* | | | |
| *Trading Area:* ☐ **UNRESTRICTED** ☐ **RESTRICTED** (if restricted provide details, including any conditions imposed by Class) | | | |
| | | | |

| **Details of Operating Company** | |
|---|---|
| Full Name of Company: | |
| IMO Company Number | |

| **PROPOSED MINIMUM COMPLEMENT** | | | | | |
|---|---|---|---|---|---|
| **DECK** | | | **ENGINE** | | |
| *Rank* | *STCW reg.* | *No.* | *Rank* | *STCW reg.* | *No.* |
| **MASTER** | | | **CHIEF ENGINEER** | | |
| **CHIEF MATE** | | | **SECOND ENGINEER** | | |
| **OFFICER IN CHARGE OF WATCH (OOW)** | | | **OFFICER IN CHARGE OF WATCH (EOOW)** | | |
| **ABLE SEAFARER - DECK** | | | **ABLE SEAFARER - ENGINE** | | |
| **DECK WATCH RATING** | | | **ENGINE WATCH RATING** | | |
| **DECK RATING** | | | **ELECTRO-TECHNICAL OFFICER** | | |
| **OTHERS** | | | **ELECTRO-TECHNICAL RATING** | | |

*The person signing this application confirms that he/she is either the Owner or in the case of a Company, a duly authorised officer of that Company, or is the Owner's agent. In the case of an Owner's agent, the Registrar may ask for a written testimony giving such authority.*

*Signature of Applicant* ..... *Print Name* .....

*Date of Application* ..... *Title* .....

**IMPORTANT NOTE – WHEN A CHANGE OR RENEWAL OF THE MINIMUM SAFE MANNING CERTIFICATE IS REQUIRED A CURRENT CREW LIST FOR THE SHIP MUST BE SUBMITTED**

# MINIMUM SAFE MANNING REQUIREMENTS FOR CERTIFICATION

**In accordance with the principles of minimum safe manning Resolution A.1047(27), adopted in 2011 all St Kitts and Nevis registered vessels are required to apply for, and be issued with a minimum safe manning certificate (MSMC) as part of their process of registering with St Kitts and Nevis International Ship Registry.**

## APPLICATION – Part A

The below tables **Appendix A and Appendix B**, set out the guidelines employed by the St. Kitts and Nevis International Ship Registry (SKANReg) for determining Minimum Safe Manning requirements for SKAN-flagged vessels.

1. The below guidelines are for reference only. Final acceptance and approval of the minimum safe manning level proposed is made by the office of International Registrar of Shipping and Seamen, based on the ship specific type, trading area and other considerations, and may differ from the details outlined below.

2. When there are any changes which may affect the vessel's minimum safe manning, the vessel's Company must prepare and submit a new proposal for the vessel's minimum safe manning.

3. ***The term "Company" stated within this document shall relate to the vessel's owners, managers or operators.***

4. The Company shall submit a proposal for minimum safe manning defining the nature of the operation of the vessel, taking into account the requirements as set out below of this Notice in conjunction with Appendix A.

5. All sections of the MSMC application Form are to be completed with accurate information.

6. The application is to be completed and signed by a person appointed by the Company.

## VOYAGE AND OPERATIONAL AREAS (Including limitations)

1. The Minimum Safe Manning Certificate (MSMC) can be issued with a designation of "**Unrestricted**" or "**Restricted**" operating areas, for those vessels which have operations to a limited geographical area.

2. Officers and crew on board SKANReg vessels are restricted in where they can sail based on their specific "Certificate of Competency" (CoC), and qualifications which is determined by factors such as.
   a) the size of the vessel they are qualified to operate,
   b) the type of waters they are allowed to navigate (coastal (restricted), ocean (unrestricted), specific regions), and
   c) the type of cargo they can carry, effectively limiting their sailing areas depending on their training and certification level.

3. To apply for an MSMC the **Form A12** – Application for first issuance, change or renewal of a minimum safe manning certificate shall be used.

4. **Restricted Voyages:** These areas may be considered as Restricted Areas:
   a) All voyages which do not exceed 72 hours between ports of call.
   b) Voyages **<** 150 NM from the nearest shore, port or safe refuge.
   c) Enclosed areas, which may include, but are not limited to:

- Mediterranean Sea
- Red Sea
- Black Sea
- North Sea
- Baltic Sea
- Caribbean (restricted areas I, II and/or III, as defined in CCSS Code)
- Caspian Sea
- Azov Sea
- Gulf of Aden
- Persian Gulf

**NOTE:** In the above cases the geographical limits of the above sea areas may be defined in more detail by **SKANReg**

   d) The Administration will take into consideration additional restricted trade areas submitted by the owner/operator.

5. **Unrestricted Voyages**: All voyages that are **NOT** Restricted voyages.
   *(as per laws of saint Christopher and Nevis, eighteenth schedule (section 456) revision date: 31 dec 2017/ schedule 7 (regulation 21)*

6. A guideline of the minimum manning levels required by SKANReg for Unrestricted or Restricted operating areas is provided in **Appendix A** and **Appendix B** of this Notice. (The tables in Appendix A&B are provided for guidance/reference and are samples only, to assist Owners/Managers when making a proposal for minimum safe manning levels).

7. In assessing minimum manning, SKANReg shall consider the vessel's tonnage, dimensions, power output, propulsion, frequency of port calls, length and nature of voyages to be undertaken, layout and provision of crew accommodation, internal and external communications, general layout and systems, all of which affect crew capabilities and emergency response reactions

8. In this respect SKANReg may increase the level of manning from that proposed by the Company.

9. SKANReg will not reduce the manning level from that proposed by the Company unless certain references in the application proposed by the Company are unnecessary or inconsistent with standard practices.

## APPENDIX A.

## DECK DEPARTMENT:

| Vessel Size | Capacity | STCW Reg. | No. of Persons Restricted[1] | No. of Persons Unrestricted |
|---|---|---|---|---|
| Over 250 Passengers | Master | II/2 | 1 | 1 |
| | Chief Mate | II/2 | 1 | 1 |
| | Officer of the Navigational Watch | II/1[1] | 1[2] | 2[1] |
| | Able Seafarer Deck | II/5[3] | 3 | 3 |
| | Deck Watch Rating | II/4[3] | 3 | 3 |
| | | **Total** | **9** | **10** |
| > 3,000 GT | Master | II/2 | 1 | 1 |
| | Chief Mate | II/2 | 1 | 1 |
| | Officer of the Navigational Watch | II/1[1] | 1[2] | 2[1] |
| | Able Seafarer Deck | II/5[3] | 1 | 2 |
| | Deck Watch Rating | II/4[3] | 2 | 2 |
| | | **Total** | **6** | **8** |
| < 3000 GT > 500 GT | Master | II/2 | 1 | 1 |
| | Chief Mate | II/2 | 1 | 1 |
| | Officer of the Navigational Watch | II/1[1] | 1[2] | 2[1] |
| | Able Seafarer Deck | II/5[3] | 1 | 1 |
| | Deck Watch Rating | II/4[3] | 1 | 2 |
| | | **Total** | **5** | **7** |
| < 500 GT | Master | II/3[1] | 1** | 1[1] |
| | Chief Mate | II/3[1] | 0 | 1[1] |
| | Officer of the Navigational Watch | II/1[1] | 1 | 1[1]** |
| | Able Seafarer Deck | II/5[3] | 0 | 1 |
| | Deck Watch Rating | II/4[3] | 1 | 1 |
| | | **Total** | **3** | **5** |

1 Masters, Chief Officers and Officers of Navigational Watch on vessels of 500 GT or more operating in unrestricted waters will require an II/2 Certificate of Competence
2 SKANReg may request one OOW be added, following review of vessel's operational area and type of ship.
3 SKANReg will consider alternative manning for ranks II/4 and II/5 as far as the total number is as per table.
4 SSO- The SSO may be the Master or (any other person designated by the Company)

**OOW** – Officer in charge of Watch
**Watch Rating** – Ratings forming part of a Navigational Watch certified under STCW reg. A-II/4
**SSO-** The SSO may be the Master or (any other person designated by the Company)

** On ships below 24m in length trading in the **Caribbean Trading Area** this may be a holder of Boat Master Licence, Grade 1 under SCV Code reg. IX/3 - Manning on vessels <100 GT (Deck department)

**Restricted**- Master and Watch rating
**Unrestricted**- Master and OOW

Vessels less than 500GT but more than 300 GT equipped with GMDSS **Radio Installations** shall carry the number of certified Radio Personnel as indicated previously.

Vessels less than 300 GT operating in the following trading areas shall carry following number of certified Radio Personnel, who may be the Master or other deck officers:

- Up to 20 NM from shore – at least one Radiotelephone Restricted Operator (VHF)- ROC
- Over 20 NM from shore – at least one Radiotelephone General Operator (VHF/HF/MF)- GOC

## ENGINE DEPARTMENT

| Propulsion power output | Capacity | STCW Reg. | No. of Persons Restricted | No. of Persons Unrestricted |
|---|---|---|---|---|
| > 3,000 kW CLASSED UMS | Chief Engineer | III/2 | 1 | 1 |
| | Second Engineer | III/2 | 1 | 1 |
| | Officer in charge of the Engineering Watch | III/1 | 1 | 1[5] |
| | Able Seafarer Engine | III/5[9] | 0 | 1 |
| | Engineering Watch Rating | III/4[9] | 1 | 1 |
| | | **Total** | **4** | **5** |
| > 3,000 kW **NOT** UMS | Chief Engineer | III/2 | 1 | 1 |
| | Second Engineer | III/2 | 1 | 1 |
| | Officer in charge of the Engineering Watch | III/1 | 1 | 2 |
| | Able Seafarer Engine | III/5[9] | 1 | 1 |
| | Engineering Watch Rating | III/4[9] | 2 | 2[8] |
| | | Total | **6** | **7** |
| > 750 kW < 3,000 kW CLASSED UMS | Chief Engineer | III/3 | 1 | 1 |
| | Second Engineer | III/3 | 0[5] | 1[4,5] |
| | Officer in charge of the Engineering Watch | III/1 | 1[4,5] | 0[5] |
| | Able Seafarer Engine | III/5[9] | 1 | 0 |
| | Engineering Watch Rating | III/4[9] | 0[7] | 2[7] |
| | | **Total** | **3** | **4** |
| > 750 kW < 3,000 kW **NOT** UMS | Chief Engineer | III/3 | 1 | 1 |
| | Second Engineer | III/3 | 1 | 1 |
| | Officer in charge of the Engineering Watch | III/1 | 1 | 2 |
| | Able Seafarer Engine | III/5 | 1 | 1 |
| | Engineering Watch Rating | III/4 | 1[7,8] | 1[7,8] |
| | | **Total** | **5** | **6** |
| < 750 Kw | Refer to Appendix B | | | |
| | | | | |

4 Manning may be reduced by this rank if vessel is classed with UMS
5 Flag Administration may review vessel's operating and traffic area and vessel type and may request one (1) additional Second Engineer or EOOW
6 The Second Engineer position required for vessels < 750 kW may be covered as a minimum by an EOOW certified under STCW III/1 if it states "valid as second engineer on vessels <3000kW"
7 Tankers of 1000 GT or more shall add one additional Engineering Watch Rating.
8 Where vessels less than 500 GT are operating as passenger vessels an additional Engineering Watch Rating may be required

## ENGINE DEPARTMENT:
## Vessels less than 24 m length trading in the Caribbean Trading Area

| Capacity | Protected Waters | Coastal Waters | Exposed Waters |
|---|---|---|---|
| Boat Engineer Grade 1 | 0 | 0 | 1 |
| Boat Engineer Grade 2 | 0[9] | 1 | 1 |
| No licence | 1[9] | 1 | 0 |
| **TOTAL** | **1** | **2** | **2** |

9 If engine power is 350 kW or more the Administration may require that Engineer holds a boat Engineer Grade 2 License under SCV reg. IX/3

## APPENDIX B.

The following factors will be considered in varying the requirements given in Appendix B with regards to Tugs, OSV's, CSV's and CTVs:

(a) Restriction of the vessel's area of operation,
(b) The trading pattern of the vessel,
(c) The complexity of the machinery spaces,
(d) The vessel **NOT** operating under U.M.S. conditions,
(e) Technical complexity of the machinery including its control and monitoring systems,
(f) Redundancy of the essential machinery,
(g) The maintenance regime employed in the upkeep of the machinery and its control systems,
(h) The level and availability of technical shore support.

## APPENDIX B.

| Vessel Size | Capacity | STCW Reg. | < 150 NM from shore | >150 NM from shore |
|---|---|---|---|---|
| >3000 GT | Master | II/2 | 1 | 1 |
| | Chief Mate | II/2 | 0 | 1 |
| | Officer of the Navigational Watch | II/1[1] | 1 | 1[1] |
| | Able Seafarer Deck | II/5[3] | 1 | 1 |
| | Deck Watch Rating | II/4[3] | 0 | 0 |
| **Total** | | | **3** | **4** |
| < 3000 GT >500 GT | Master | II/3[1] | 1 | 1[1] |
| | Chief Mate | II/3 | 0 | 0 |
| | Officer of the Navigational Watch | II/1[1] | 1[10] | 1[1] |
| | Able Seafarer Deck | II/5[3] | 1 | 1 |
| | Deck Watch Rating | II/4[3] | 0 | 0 |
| **Total** | | | **3** | **3** |
| < 500 GT | Master | II/3[1] | 1 | 1[1] |
| | Chief Mate | II/3 | 0 | 0 |
| | Officer of the Navigational Watch | II/3[1] | 1 | 2[1,10] |
| | Able Seafarer Deck | II/5[3] | 0 | 0 |
| | Deck Watch Rating | II/4[3] | 0 | 0 |
| **Total** | | | **2** | **3** |
| **Propulsion Power - kW** | **Capacity** | STCW Reg. | < 150 NM from shore | > 150 NM from shore |
| >3000 kW | Chief Engineer | III/2 | 1 | 1 |
| | Second Engineer | III/2 | 0 | 0 |
| | Officer in charge of the Engineering Watch | III/1 | 1 | 1 |
| | Able Seafarer Engine | III/5[9] | 0 | 1 |
| | Engineering Watch Rating | III/4[9] | 0 | 0 |
| **Total** | | | **2** | **3** |
| < 3000 kW >750 kW | Chief Engineer | III/3 | 1[11] | 1[11] |
| | Second Engineer | III/3 | 0 | 0 |
| | Officer in charge of the Engineering Watch | III/1 | 1 | 1 |
| | Able Seafarer Engine | III/5[9] | 0 | 1 |
| | Engineering Watch Rating | III/4[9] | 0 | 0 |
| **Total** | | | **2** | **3** |
| < 750 kW | Chief Engineer | III/2 | 1[11,12] | 1[11] |
| | Second Engineer | III/2 6 | 0 | 0 |
| | Officer in charge of the Engineering Watch | III/1 | 0 | 1 |
| | Able Seafarer Engine | III/5[9] | 0 | 0 |
| | Engineering Watch Rating | III/4[9] | 1 | 1 |
| **Total** | | | **2** | **3** |

10 Manning may be reduced if Master keeps watch
11 Holder of < 3000kW endorsement
12 Flag Administration may consider a MEC if >350kW and <750Kw (Marine Engine Certificate)

## SUPPLEMENTARY NOTES – Part B

**When applying for minimum safe manning, additional factors have to be considered in addition to the voyage areas and types of operation.**

**Part of the application review will be for SKAN Reg to look at the number of personnel required to safely perform their roles onboard, taking into account their expertise and qualifications, rota patterns, MLC factors such as availability of accommodation, types of vessels, or whether lower ranks are suitably qualified to step up and cover for those holding higher levels of responsibility.**

**The following explains the process when assessments including but not limited to the following sections which form the basis for consideration, are factored into making a decision to ascertain suitability for acceptance as part of manning the vessel safely.**

## Section 1. WATCHKEEPING

1. The Company responsible for the operation of the vessel shall ensure that all watchkeepers on board its vessels adhere to the minimum hours of rest in accordance with international regulations.

2. For vessels of 3000 GT and above and propulsion power of 3000 KW and above the Master and the Chief Engineer should not form part of the vessel watches, and a three-watch system should be adopted for both the deck and engine departments.

3. For vessels of less than 3000 GT and with propulsion power of less than 3000 KW a two-watch system may be adopted provided that the requirements for work and hours of rest are met

4. For deck watches that are normally limited in numbers, a routine for providing additional assistance without delay shall be established and standby personnel shall be identified and immediately contactable.

5. On vessels with periodically unattended machinery spaces (UMS) notation and of less than 2000 KW propulsion power and in case of limited number of cabins and bunks a watch with only the Chief Engineer may be adopted during the daytime (0800-2000) provided that the requirements for work and hours of rest are met and that additional assistance without delay is established.

6. When the engine watch is only with the chief engineer, the Company shall anticipate the number of hours that the Chief Engineer must devote to unscheduled work in case of an emergency. As soon as practicable after the normal situation has been restored, the Chief Engineer shall have an adequate period of rest.

7. Companies shall ensure that the vessel(s) have sufficient trained navigational watchkeeping personnel to ensure that the navigation control room/bridge is manned by at least 2 watch-keepers during hours of darkness and conditions of restricted visibility. One of these watch keepers shall be a Navigational Officer.

## Section 2. VESSELS FITTED WITH ECDIS

1. The Company shall ensure that if the vessel is fitted with ECDIS, the Master and navigating officers are qualified in its use and operation and have undertaken appropriate generic and type specific ECDIS training.

2. The Master shall ensure that all navigating officers have documentary evidence of ECDIS training prior to being assigned their onboard navigational duties.

## Section 3. INTERNATIONAL SHIP & PORT SECURITY (ISPS) CODE – SHIP SECURITY OFFICERS

1. All ship security officers and deputy security officers on board St. Kitts and Nevis flagged vessels to which the ISPS Code applies shall have a certificate issued by an administration whose certificates are recognised by St Kitts and Nevis, in accordance with regulation VI/5 of STCW 78 as amended. Recognised administrations are those on the STCW whitelist.

2. One appropriately trained person shall be designated as the Ship Security Officer (SSO) as required under the ISPS Code.

3. The SSO may be the Master, or any other person designated by the Company. The officer so designated shall meet the training requirement in accordance with the provisions of STCW Regulation VI/5 and shall be directly responsible to the Master (if the SSO is not the Master) and the Company Security Officer (CSO) in compliance with the ship's SMS.

4. The Company shall ensure that one of the capacities proposed to be included on the MSMC is also able to carry out the duties of the SSO.
5. Any Company operating vessels, which are required to comply with the ISPS Code, shall ensure that all persons specified on the MSMC are trained in accordance with the provisions of STCW requirements 7.8.2.

6. The Master shall ensure that all persons receive security related familiarisation training before being assigned to shipboard duties. The security related training familiarization training shall be conducted by the SSO or an equally qualified person

## Section 4. GMDSS

**Applicable to Vessels over 300GT**

1. On SKANReg vessels with GMDSS, all officers with radio duties shall hold a valid endorsed GMDSS radio operators Certificate of Competency (COC), as per STCW IV/2. Therefore, a SKANReg vessel shall have at least two officers on board to perform radio duties in their own respective watch, when a 2-watch system is in place.

2. In case of a 3-watch system, to ensure a continuous radio watch while at sea, the third watch should either be supported by one of the two officers as per Sec. 6.1 above or manned with a third officer who also holds a GMDSS radio operators COC.

3. When the officers of Sec. 6.1 above provide support for the third watch, their total hours of work and rest are to be maintained at all times.

4. The SKANReg GMDSS radio operators (ROC/GOC) is to be adequate for the Sea Areas (A1, A2, A3, A4) on which the vessel operates.

5. Vessels equipped with ***Radio Installations*** for the following GMDSS sea areas shall carry the following number of certified Radio Personnel:
    a) **Area A1** – at least one officer with Restricted Operator Certificate (ROC)*
    b) **Area A2** – at least one officer with General Operator Certificate (GOC)* or one dedicated radio officer with GOC
    c) **Areas A3 or A4** – at least two officers with GOC* or one dedicated radio officer with GOC

* May be the Master or other deck officer.

6. Passenger ships carrying up to 250 passengers shall follow the tables for cargo ships of the same size.

7. Vessels less than 500GT but more than 300 GT equipped with GMDSS ***Radio Installations*** shall carry the number of certified Radio Personnel as indicated previously.

8. Vessels less than 300 GT operating in the following trading areas shall carry following number of certified Radio Personnel, who may be the Master or other deck officers:
    a) Up to 20 NM from shore – at least one Radiotelephone Restricted Operator (VHF)- ROC
    b) Over 20 NM from shore – at least one Radiotelephone General Operator (VHF/HF/MF)- GOC

## Section 5. STCW 95 Code A – VIII/1- VIII/2

1. It is the responsibility of the Owners and Master to ensure compliance with the provisions of Resolution A.1047(27) and the STCW Convention, in particular Regulations VIII/1 and VIII/2 and Sections A-VIII/1 and A-VIII/2 of STCW 95 regarding Fitness for Duty and Watchkeeping and Rest Periods arrangement and principles to be observed.

2. **STCW Code A – VIII/1, MSA sect 67"** refers to a specific section within the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW) Code, specifically addressing mandatory

provisions regarding seafarers' hours of rest, and is often linked to the Merchant Shipping Act (MSA) section 67 which governs similar regulations within a country's maritime law; essentially requiring that all watchkeeping seafarers must be provided a minimum of 10 hours of rest within any 24-hour period to prevent fatigue and ensure safe operations at sea.

## Section 6. MLC 2006

**Hours of Rest**

1. Part 6 of the Merchant Shipping (Maritime Labour Convention) Regulations 2013 states the SKANReg requirements for the minimum hours of rest, and these Regulations must be taken into account when determining the vessel's minimum safe manning.

2. MLC 2006 requires that each Member State shall fix either a maximum number of hours of work, or minimum number of hours of rest, for a given period for all seafarers.

3. In keeping with this requirement, SKANReg has elected to continue with its current requirements and has established a minimum hours of rest standard with which a shipowner must comply. "Hours of rest" means time outside hours of work and does not include short breaks of one hour or less for a meal.

4. The minimum requirement for hours of rest provided should be:
   - 10 hours in any 24-hour period, which may be divided into no more than 2 periods, one of which shall be at least 6 hours in length, and no more than 14 hours between any consecutive periods; and
   - 77 hours in any 7-day period.

**Accommodation**

5. A Company may decide to employ more seafarers than stipulated in the MSMC. These seafarers shall be suitably trained to an acceptable and recognised level appropriate to their duties in addition to having the minimum basic training for emergency, safety, and survival as per STCW 95 guidelines. The statutory certificates will detail the maximum number of persons on board and there must be sufficient accommodation satisfying the MLC 2006 (as amended) standards for that number

**All SKANReg registered vessels shall be required to follow and adhere to these requirements.**

## Section 7. COOKS

1. **MLC 2006, Regulation 3.2, Standard A3.2** refers to the section within the Maritime Labour Convention 2006 that outlines the minimum standards for food and catering provided to seafarers on board a ship, ensuring adequate quantity, quality, variety, and nutritional value of meals, taking into account cultural and religious dietary needs; essentially guaranteeing proper food and water provision for crew members on a vessel.

2. **In all cases where the total manning onboard consists of more than 10 persons, there shall be a dedicated certified cook.**

3. If the MSMC does not show a requirement of more than 10 persons, then the company should have one person designated as the Cook. If the person so appointed does not have a ship's cook certificate, then the company shall ensure that he/she has the necessary skills, experience and training or instruction in food hygiene, personal hygiene, and handling and storage of food onboard ship maritime Labour Convention, Regulation 3.2, Standard A3.2.

4. For a prescribed manning of less than 10, this requirement may be waived by the Registrar if there is a suitable alternative arrangement.

## Section 8. UNATTENDED MACHINERY SPACES (UMS)

1. The minimum safe manning document states whether the vessel is operating in UMS mode or with a manned engine room.

2. To operate in UMS mode, the vessel will have to be classed for periodically unattended engine room operation in accordance with the vessel's Classification Society requirements. A vessel operating in UMS mode requires less engine room personnel than a permanently manned engine room.

3. In the event of a failure of the UMS system, SKAN Reg must be notified in order for the engine room manning levels to be re-assessed. Following the assessment, there may be a requirement for additional engine room personnel and a short term minimum safe manning document will be issued reflecting this increase in personnel. This will state the vessel is operating with a manned engine room. When the engine room is being operated in a non-UMS mode the engine room should be manned by at least 2 persons.

4. The UMS notation assigned by a Classification Society shall be considered when determining whether the machinery space can be unattended.

5. If the manning of a vessel with propulsion power of more than 3000kW is based on UMS notation, then the vessel shall carry an additional watch-keeping engineer officer (EOOW) if the UMS systems are inoperative for more than seven days. The Company shall notify the affected Classification Society and SKANReg of the related equipment failure affecting the UMS notation.

## Section 9. ELECTRO-TECHNICAL DEPARTMENT

1. St. Kitts & Nevis vessels should carry sufficient Electro-Technical Officers (STCW Regulation III/6 OR III/7) and Electro-Technical ratings (STCW Regulation III/7) where required to:

   a) operate the vessels electrical and electronic equipment; and
   b) maintain the safety of the vessels electrical and electronic systems.

2. Vessels may carry persons who are specifically assigned the specific duties, tasks and responsibilities relating to electrical and electronic tasks. If required to be carried, these persons should be certified as Electro-Technical Officers or Electro-Technical Ratings and satisfy the requirements of STCW Regulations III/6 or III/7 respectively.

3. All electrical technical officers must be in possession of approved training where high voltage may be present. High voltage means an alternating current (AC) or direct current (DC) voltage in excess of 1,000 volts. As per STCW Chapter I/1.1.44.

4. The MSMC need only include these persons if they are additional to the Engineering Officers and they have been assigned shipboard duties to satisfy the requirements of the maintenance of a safe engineering watch, emergency as specified in the Muster List or operation and maintenance of the ship's electrical, electronic and control systems

## Section 10. DOCTOR OR MEDICALLY TRAINED PERSON/S

1. The vessel shall carry a qualified medical doctor when there are 100 or more persons onboard. Where the ship is engaged on voyages during which the ship is no more than 36 hours steaming distance from a port offering qualified medical care and medical facilities, the vessel may apply for an exemption.

2. Where there is no doctor on board, there shall be at least one person, who may be the Master, or an officer designated to provide medical care.

   a) The Master should seek additional medical assistance when so required.
   b) The designated person shall always be available to provide medical care to seafarers in compliance with onboard Safety Management System (SMS).
   c) The designated person shall be trained in medical care in accordance with the STCW Regulation VI/4. 5.3.6.
   d) The Doctor or person designated to provide medical care shall undergo refresher training at period not exceeding 5 years and shall be capable of conversing both spoken and written in the English language.

## Section 11. DRUG AND ALCOHOL

1. As per SCHEDULE 2 *(Regulation 32)* of the MERCHANT SHIPPING ACT CAP 7.05 on *Guidelines for inquiries made pursuant to sections 122, 124 and 422 of the Merchant Shipping Act CAP 7.05*, Owners, Managers and Masters are to seek and consider guidance on drug and alcohol consumption or dependency as provided by the Oil Companies International Marine Forum (OCIMF) in *the Guidelines for the Control of Drugs and Alcohol in the Maritime Industry*. These guidelines, as updated in 2024, provide recommendations for drug and alcohol policies and procedures on vessels to prevent abuse and promote safety. The guidelines address workplace testing, but not testing related to substance dependency treatment or return to work. Key aspects of such policies and recommendations are as per the following:

- Companies should establish specific drug and alcohol policies, which seafarers are required to follow.
- For safety-critical duties, there are often limits on blood alcohol content (BAC), typically 0.05% or 0.25mg/l alcohol in breath.
- Alcohol consumption is prohibited within a specified period (e.g., four hours) before watch or duty, and during duty.
- If alcohol is permitted, it may be limited to certain times and locations and may be subject to the Master's discretion.
- It's crucial to be aware that company-specific policies may differ, and stricter local regulations may apply in certain jurisdictions.
- The overarching goal of these regimes is to ensure the safety of the crew and the vessel by preventing alcohol and drug-related incidents.
- Seafarers need to be fully aware of the specific policies in place on their vessel and understand the consequences of violating them. In essence, drug and alcohol policies on ships are a critical component of maritime safety, designed to minimize risks associated with substance use and promote a safe working environment.

## Section 12. PASSENGER VESSELS, INCLUDING RO-RO PASSENGER VESSELS

1. Any Company operating a passenger vessel may employ additional hotel staff and other non-marine crew such as shopkeepers, barbers, laundrymen etc. All such persons must be given STCW familiarisation training and if they are assigned, either safety, security or environmental protection duties, then the persons should have the basic STCW training.

2. The MSMC shall include all persons who are required to be assigned shipboard duties to satisfy the requirements of the Emergency Muster List for guidance of passengers to assembly points, muster stations and survival crafts and any other associated emergency duties. Such persons should be trained in accordance with the relevant requirements of STCW Regulation V/2.

3. The Company should take into consideration the number of passengers when assigning such persons.

4. The MSMC should include all persons who are required to be assigned either security or environmental protection shipboard duties. Such persons should be trained in accordance with the relevant requirements of STCW Regulation V/2.

5. One designated person holding a STCW Regulation IV/2 (GMDSS Certificate of Competency) shall remain in charge of communication duties for the entire duration of an emergency until the Master gives the order for evacuation of the ship.

6. All survival craft must be manned by duly qualified persons in accordance with STCW and as required under SOLAS 1974, as amended.

## Section 13. APPLICATION FOR A MSMC

1. The Company shall make an application for an MSMC following an assessment that takes into consideration the guidelines and requirements as stipulated herein, and IMO Resolutions A.893(21), A.999(25), A.1047(27) and A.1079(28), as applicable.

2. The proposed minimum safe manning level is not limited to the watch-keeping personnel but shall now include any additional persons deemed necessary for the **safe operation** of the ship taking into consideration the international guidelines, requirements, and the following:

3. **the capability to**:

   a) maintain safe navigational, port, engineering and radio watches in accordance with regulation VIII/2 of the 1978 STCW Convention, as amended and maintain general surveillance of the ship,
   b) moor and unmoor the ship safely,
   c) manage the safety functions of the ship when employed in a stationary or near stationary mode at sea,
   d) perform operations, as appropriate, for the prevention of damage to the marine environment,
   e) maintain the safety arrangements and the cleanliness of all accessible spaces to minimize the risk of fire,
   f) provide for medical care on board ship,
   g) ensure safe carriage of cargo during transit,
   h) inspect and maintain, as appropriate, the structural integrity of the ship,
   i) operate in accordance with the approved Ship's Security Plan.

4. **the ability to:**

   a) operate all watertight closing arrangements and maintain them in effective condition and deploy a competent damage control party,
   b) operate all onboard firefighting and emergency equipment and life-saving appliances, carry out such maintenance of this equipment as is required to be done at sea, and muster and disembark all persons on board and
   c) operate the main propulsion and auxiliary machinery including pollution prevention equipment and maintain them in a safe condition to enable the ship to overcome the foreseeable perils of the voyage. the maintenance of onboard functions,

5. **such as**:

   a) any ongoing training requirements for all personnel, including the operation and use of firefighting and emergency equipment, life-saving appliances and watertight closing arrangements,
   b) any specialized training requirements for particular types of ships and in instances where crew members are engaged in shipboard tasks that cross departmental boundaries,
   c) the provision of proper food and drinking water,
   d) the need to undertake emergency duties and responsibilities and
   e) the need to provide training opportunities for entrant seafarers to allow them to gain the training and experience

6. **other relevant factors including the consideration of**:

   a) the performance of functions at the appropriate levels of responsibility,
   b) any cargo handling,
   c) the operation of the ship and care for persons on board,
   d) any marine engineering, including the tasks, duties and responsibilities involved with ship's propulsion,
   e) any electrical, electronic and control engineering requirements, any radiocommunications,
   f) the management of safety, security and protection of the marine environment,
   g) the number of qualified and other personnel required to meet peak workloads situations.

7. The applying Company may be required to provide additional supporting information such as the Muster List, manning for mooring operations, an hours of rest schedule, etc., to clarify the proposed manning levels which should enable all such operations.

8. **If additional information/clarification is required, SKANReg may issue a conditional MSMC during this process**

9. Passenger vessels, offshore units or any other vessel that may have different manning levels dependent on the vessel's operational status (e.g. FPSO re-positioning, passenger ship with different passenger complement) should reference this information and propose a manning scale linked to the relevant condition.

10. As an example, a passenger vessel may have a different manning level with full passenger complement onboard as opposed to a re-positioning voyage without any passengers and likewise an FPSO manning level maybe different when underway compared to when on station.

## Section 14. ISSUE OF MSMC

1. **IMO Assembly Resolution A.1047(27) Principles of Safe Manning:**
   This document provides a framework for determining minimum safe manning levels, encompassing factors like ship size, type, operational requirements including power and propulsion, and crew workload.

2. **Flag State Regulations:**
   SKAN Reg, sets the specific requirements for minimum safe manning. Factors like towing, ship handling, and the nature of operations shall be taken into consideration when determining minimum safe manning.

3. SKANReg will consider all international guidelines and requirements in drafting an MSMC in order to be satisfied that the manning shall meet the intended levels.

4. In this respect SKANReg may increase the scale of manning from that proposed by the Company.

5. SKANReg **WILL NOT** reduce the manning level from that proposed by the Company unless it considers certain references in the MSMC application proposed by the Company are unnecessary or inconsistent with recognised standard practices and will review manning on a case-by-case basis.

6. Notwithstanding the manning prescribed in the MSMC, if the Company subsequently determines that it is difficult to provide minimum periods of rest after meeting all the essential duties and functions then the Company shall increase the manning levels and notify SKANReg accordingly.

7. **No vessel shall proceed to sea or undertake a voyage unless it is manned at the minimum and complies with the necessary regulations and requirements of SKANReg Minimum Safe Manning.**

## Section 15. VALIDITY OF MSMC

1. As per the requirements of Annex 5 of the IMO Assembly Resolution A.1047(27) A MSMC issued to a vessel shall have a validity of either one (1) or four (4) years from the date of issue.

2. A new MSMC is to be issued when:
   a) there is a change of a vessel's name, or
   b) there is a change of trading area as documented on the MSMC, or
   c) change of Managers, or
   d) any other changes/alterations to the ship, its crew, construction, machinery, equipment, operation, maintenance, or management that affects the manning level required to continue safe operations compliant with the Conventions.

3. Notwithstanding the provisions of STCW A-VIII/1.9, if there is a need for regular exceptions from the weekly rest period, the Company shall undertake an assessment of the manning level to determine if the manning level onboard is sufficient, to comply with the hours of rest requirements taking into consideration the contents of these guidelines and requirements.
4. The outcome of this assessment shall be documented with a copy maintained onboard and if the assessment is negative, the necessary application shall be submitted to SKANReg to review the safe manning level.

## Section 16. PORT STATE CONTROL

1. The STCW Convention, Regulation I/4, enables port State authorities to verify conditions on any vessel, particularly as to the qualifications and ability of personnel on board.

2. Port State authorities may pay particular attention to the following:
   a) that all seafarers on board who are required to be certificated hold an appropriate SKANReg certificate or provide documentary proof that an application for an endorsement has been submitted to SKANReg; and/or
   b) the numbers and certificates of the seafarers serving on board conform to the applicable safe manning requirements of SKANReg.

3. In accordance with section A-I/4 of the STCW Code, port State authorities may assess the ability of the seafarers of the vessel to maintain watchkeeping standards as required by the STCW Convention, if there are clear grounds to evidence that such standards are not being maintained due to any of the following having occurred:
   a) the vessel has been involved in a collision, grounding, or stranding.
   b) there has been a discharge of substances from the vessel when underway, at anchor or at berth, which is illegal under any international convention.
   c) the vessel has been manoeuvred in an erratic or unsafe manner whereby routing measures adopted by the IMO or safe navigation practices and procedures have not been followed; or
   d) the vessel is otherwise being operated in such a manner as to pose a danger to persons, property, or the environment.

4. Regulation 2.7 of the MLC requires vessels to have a sufficient number of seafarers employed on board to ensure that they are operated safely, efficiently, and with due regard to security under all conditions, taking into account concerns regarding seafarer fatigue and the nature and conditions of the voyage.

5. Port State Control officers (PSCO) are entitled to verify that this is the case when there are grounds for conducting a more detailed inspection.

## Section 17. WITHDRAWAL OF MSMC

1. **SKANReg** may withdraw the vessel's minimum safe manning certificate if:

   a) the vessel's Company fails to submit a new proposal for the vessel's minimum safe manning when changes in the trading area(s), construction, machinery, equipment or operation and maintenance of the vessel have taken place which affect the minimum safe manning; or
   b) the vessels Company misleads SKANReg with respect to the vessel type, construction, machinery, equipment or operational areas to reduce the number of personnel serving onboard
   c) the vessel persistently fails to provide or comply with the minimum hours of rest and living requirements.

## Section 18. APPLICABLE TO TUGS/CSV'S/OSV'S AND CTV'S ONLY (Please refer to Appendix B)

Minimum safe manning for Tugs, Offshore Supply vessels (OSV), Construction Support Vessel (CSV) and Crew Transfer Vessels (CTV) including specialised utility vessels should be determined by various factors and can vary depending on the vessels size, operations, and the specific requirements of SKAN Reg, but a general principle is to ensure that enough qualified and experienced seafarers are on board for the safe operation of the vessel.

**TUGS** – given the diverse working patterns and operational cycle of these vessels, owners and operators must take into account the working pattern, rota and/or work schedules of crews, the particular operational requirements of a ship or group of ships and any call-out requirements of a port, harbour or other organisation.

**OSV/ CTV/ CSV** - These present special issues because of the diverse nature of their operations and the conditions under which they are required to operate. Owners and operators are particularly reminded of the restrictions placed on working hours under the MLC 2006 as amended and must set manning levels accordingly.

## REFERENCES


1. SOLAS, International Convention for the Safety of Life at Sea.
2. IMO Assembly Resolution A.1047(27), Principles of minimum safe manning, adopted 30 November 2011. Maritime Labour Convention 2006 (MLC).
3. The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, (STCW Convention). The Seafarers' Training, Certification and Watchkeeping Code (STCW Code).
4. The International Ship and Port Facility Security Code (ISPS Code). Form 159 – Table of Shipboard working Arrangements.
5. IMO/ILO Guidelines for the development of tables of seafarers' shipboard working arrangements and formats of records of seafarers' hours of work or hours of rest.


## APPENDIX C Document Control

| Revision No | Date | Description Of Revision |
|---|---|---|
| 1.0 | 2012 | First Issue |
| 2.0 | 2025 | Revised, amended, and updated version including latest Resolutions |
| 3.0 | 2025 | Updates to Rev.2.0. Amendments to Appendix A, inclusion of Appendix B, amendment to Sec. 15 1&2, addition of Sec. 19 (APPLICABLE TO TUGS/OSV'S AND CTV'S ONLY) |
| 4.0 | 2025 | MSMC Document split into two sections. Part A & B. Amendment to table Appendix A relating to less than 750Kw, All Vessels removed from Section 11 subject header. Section 16 inclusion of 1 year validity. Appendix A review of levels. |
| 5.0 | 2025 | Section 11, Drug and Alcohol, Section 9, inclusion of reference to High Voltage, Amendments to STCW requirements Appendix A and B |
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