



ST. KITTS & NEVIS INTERNATIONAL SHIP REGISTRY

MARITIME CIRCULAR – MC 156 26

EXTENDED IMPLEMENTATION OF CONCENTRATED INSPECTION CAMPAIGN (CIC) ON MLC 2006

To: All Shipowners, Ship Managers, Operators, Masters, Recognized Organizations and Flag State Inspectors (FSI), interacting with our fleet.

1. Purpose

- 1.1 Following the successful launch of our initial MLC inspection initiative, the Technical Department is formalizing an extended Concentrated Inspection Campaign (CIC). This phase moves beyond surface-level documentation to a rigorous assessment of operational compliance.
- 1.2 This campaign is mandatory for all vessels undergoing Flag State Inspection (FSI) effective effective as of July 6th, 2026.

2. Applicability

- 2.1 This Maritime Circular is applicable to all shipowners, managers, operators, crew agencies crew members, masters, recognized organization and Flag State Inspectors (FSI), interacting with our fleet,
- 2.2 It governs vessels registered under the St Kitts & Nevis International Ship Registry that are subject to the Maritime Labour Convention (MLC) 2006 compliance mandates.

3. Legal References and Framework

- 3.1 This Circular shall be read in conjunction with:
 - Code for Recognized Organizations, IMO Resolution MSC.349(92)
 - IMO Instruments of Implementation Code, IMO Resolution A.1070(28)
 - ISM Code
 - ISPS Code
 - MLC Code
 - The St. Kitts and Nevis Merchant Shipping Act

4. Instructions

4.1 FSI Inspectors are tasked with evaluating the following critical pillars of the Maritime Labour Convention:

- 4.1.1 **Certification & Documentation:** Verifying the presence and validity of the Maritime Labour Certificate and DMLC (Parts I & II). Special attention to validity of the financial security certificates, and records of rest hours and payments.

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- 4.1.2 Socio Economic Compliance:** Ensuring Seafarer Employment Agreements (SEAs) are signed, in the correct language, and that wage payment schedules are strictly followed.
- 4.1.3 Operational Welfare:** Auditing hours of rest records for compliance with MLC 2006 requirements and ensuring that the onboard complaint procedure is not only displayed but understood by the crew.
- 4.1.4 Hygiene and Infrastructure:** Comprehensive inspection of food quality, storage temperatures, galley hygiene, and the structural integrity of crew accommodation.

4.2 Mandatory Action Items for Flag State Inspectors (FSI)

- 4.2.1 All FSI's conducted from July 6th, 2026, to include the attached MLC Compliance Audit Sheet (Annex 1 to this MC)
- 4.2.2 Review the vessel's prior PSC history specifically for MLC deficiencies, and if there has been any crew complains in the pass reported to the flag or to any local authority.
- 4.2.3 Conduct face-to-face interviews with at least two crew members regarding their understanding of the onboard complaint procedure.
- 4.2.4 Document all non-conformities in the standardized FSI reporting format.
- 4.2.5 Mandate a Corrective Action Plan (CAP) for every finding and deficiencies at the conclusion of each inspection is essential.

5. Reporting Requirements

- 5.1 Timely and accurate reporting of findings and deficiencies at the conclusion of each inspection is essential.
- 5.2 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.
- 5.3 Reports and related correspondence to be submitted to FSI@skanregistry.com / Technical@SkanRegistry.com

6. Further Information and Assistance

- 6.1. The Administration expects full cooperation from all parties in maintaining the highest standards of to a rigorous assessment of operational compliance and reporting.

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6.2. If you have general questions or require assistance regarding this circular, please contact this office at FSI@skanregistry.com / Technical@SkanRegistry.com

7. Validity and Supersession

7.1 This Circular shall enter into force on July 6th, 2026 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 shipowners, operators, masters, and Flag State Inspectors (FSI) from complying with any applicable convention requirement, statutory obligation, or specific direction issued by the Administration in relation to an individual vessel or case.

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8. Control of MC Changes

Document Version	Date	Details of Change
00	22/06/2026	Initial issue

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ANNEX 1

	St. Kitts and Nevis International Ship Registry	Code: QPT002-CKL- 001 Rev: 00 Page 5 of 5
MLC COMPLIANCE AUDIT SHEET		

Category	Specific Item for Audit	Verification Method	Compliance Status (Y/N/NA)
Documentation	Valid Maritime Labour Certificate	Physical Inspection	
Documentation	DMLC Part I and II	Physical Inspection	
Employment	Signed SEAs (all crew)	Document Review	
Wages	Monthly Wage Accounts	Document Review	
Work/Rest	Hours of Rest Records (1 month)	Signature/Log Audit	
Complaint	On-board Complaint Procedure Displayed	Visual/Interview	
Catering	Galley Hygiene & Food Storage	Physical Walkthrough	
Medical	Medical Chest Inventory	Audit of Expiry Dates	
Safety	OSH Policy	Document Review	
Training	Safety Drill Records	Document Review	
Accommodation	Crew Cabins/Recreation Spaces	Physical Walkthrough	

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