

Circular 297/ 2024

To: All Oil Chemical, LNG/LPG Cargo Tanker Owners, Commercial Operators, ISM managers, owners, and MCI team.

Subject: Ship-to-Ship Transfers

Date: 23rd September 2024

Attachments: [STS Transfer Advanced Notification Form](#)

Summary:

For vessels carrying out Ship-to-ship (STS) transfers involving the transfer of oil, chemicals, and liquefied gas by sea-going tankers, either underway or with one ship moored alongside another must comply with the provisions set out in this circular.

Please note that this circular and the requirements specified therein do not apply to bunkering operations. STS transfers at sea by tankers of 150 gross tonnage and above are regulated by MARPOL Annex I and:

1. The IMO Manual on Oil Pollution, Section I, Prevention, 2011 Edition (IMO Manual); and
2. The OCIMF Ship to Ship Transfer Guide for Petroleum, Chemicals and Liquefied Gases, First Edition, 2013 (the Guide)

Key requirements are:

1. **STS Operations Plan (STSOP):** Every tanker must carry an STSOP approved by IACS RO and written in the ship's working language^[4].
2. **Qualified Personnel^[2]:**
 - a. Oil cargo^[3] transfers must be supervised by a Person in Overall Advisory Control (POAC).
 - b. Chemical and LNG/LPG cargo^[4] transfers require an STS Superintendent (STSSI).
3. **Risk Assessment:** The transfer area must be assessed for safety based on guidelines from the IMO Manual^[5] and the OCIMF Guide^[6].
4. **Advance Notification:** Oil tankers subject to regulation 42 of Chapter 8, MARPOL Annex I must notify Maritime Cook Islands and the Coastal State authority (if STS is within their Territorial Sea or Exclusive Economic Zone) at least 48 hours before the scheduled STS operations, with information required by **Paragraphs No. 2.2.1** of the Guide and **Paragraph No. 6.2.3.1** of the IMO Manual.
5. A copy of the coastal state's acknowledgment must be retained by the Master
6. **Record Keeping:** The STS operation must be documented in the STSOP, and records must be kept in the Oil Record Book or Cargo Record Book for at least three years.

The ship's master and ISM Management Company is responsible for ensuring compliance with these requirements. Failure to meet these obligations can result in breaches of MARPOL and the ship's Safety Management System (SMS) and the tanker being deregistered. Failure to notify MCI or the coastal state (if relevant) will result in deregistration.

Information within this circular is effective from the date of this circular.

[1] MARPOL Annex 1 Chapter 8 regs 40-42; additionally (ISM) provides for all types of vessels to have on-board procedures for key operations including STS transfers; furthermore, the Guide specifies that the requirements for vessels to be provided with an STS operations plan should be considered for adoption by vessels involved in the STS transfer of other cargoes as recommended best practice.

[2] Qualifications detailed in Chapters 1.6 and 1.7 of the Guide and Paragraph No. 6.2.1.2 of the IMO Manual

[3] Covered by MARPOL Annex I

[4] Covered by MARPOL Annex II

[5] Para 6.2.2.1 of the Manual

[6] Paras 2.3 and 2.4 of the Guide

For further enquiries, please contact Maritime Cook Islands
at technical@maritimecookislands.com