

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^[1].
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



COOK ISLANDS

Ship to Ship Transfer Advance Notification

Ship
Registration
FORM 106
v.1

Each oil tanker subject to MARPOL Annex I Chapter 8 that plans STS operations within the territorial sea, or the Exclusive Economic Zone of a Party to MARPOL shall notify Maritime Cook Islands and the Coastal State not less than 48 hours in advance of the scheduled STS operations¹.

Where, in an exceptional case, all of the information required below is not available not less than 48 hours in advance, the oil tanker discharging the oil cargo shall notify the Coastal State and Maritime Cook Islands, not less than 48 hours in advance that an STS operation will occur, and the required shall be provided to the Party at the earliest opportunity.

The national contact point list for Coastal States is listed in MSC-MEPC.6/Circ.20 or its subsequent amendments.

If the STS Transfer involves Russian Origin Oil or Petroleum a Per Voyage- Oil Price Cap Attestation must be completed and submitted with this notification. See MCI circular 298/2024 for guidance.

Maritime Cook Islands contact point for STS Transfer notifications is monitoring@maritimecookislands.com

For further guidance, see MCI Circular 297/2024.

Oil tankers involved in the Ship-to-Ship Transfer			
Vessel name		Vessel name	
Flag		Flag	
Call Sign		Call Sign	
IMO Number		IMO Number	
Estimated time of arrival		Estimated time of arrival	
Details of the Planned STS			
Date		Time ²	
Geographical location ³		Conducted at anchor or underway	
Oil Type		Quantity of Oil	
Planned duration of the STS operation			
Identification of STS operations service provider or person in overall advisory control and contact information			
STS operations service provider		Person in overall advisory control (POAC)	
Name		Full name	
Contact details		Contact details	
Confirmation that the oil tanker has on board an STS operations Plan meeting the requirements of Regulation 41			
Please supply a copy of the IOPP Certificate including form B			

¹ MARPOL Annex I Reg 42

² At the commencement of the STS operation

³ At the commencement of the STS operation

MARPOL Annex I Reg 41 – General Rules on safety and environmental protection

1. Any oil tanker involved in STS operations shall carry on board a Plan prescribing how to conduct STS operations (STS operations Plan) not later than the date of the first annual, intermediate or renewal survey of the ship to be carried out on or after 1 January 2011. Each oil tanker's STS operations Plan shall be approved by the Administration. The STS operations Plan shall be written in the working language of the ship.
2. The STS operations Plan shall be developed taking into account the information contained in the best practice guidelines for STS operations identified by the Organization⁴ The STS operations Plan may be incorporated into an existing Safety Management System required by chapter IX of the International Convention for the Safety of Life at Sea, 1974, as amended, if that requirement is applicable to the oil tanker in question.
3. Any oil tanker subject to this chapter and engaged in STS operations shall comply with its STS operations Plan.
4. The person in overall advisory control of STS operations shall be qualified to perform all relevant duties, taking into account the qualifications contained in the best practice guidelines for STS operations identified by the Organization⁵.
5. Records⁶ of STS operations (STSOP, Oil Record Book or Cargo Book, notifications to Coastal State and MCI) shall be retained on board for three years and be readily available for inspection by a Party to the present Convention

Declaration

I, _____ Master, of the above named vessel, declare that the POAC is qualified in accordance with the qualifications detailed in Chapters 1.6 and 1.7 of the OCIMF Ship to Ship Transfer Guide for Petroleum, Chemicals and Liquefied Gases, First Edition, 2013 and paragraph No. 6.2.1.2 of the IMO Manual on Oil Pollution, Section I, Prevention, 2011 Edition.

I have attached to this notification

- Copy of the IOPP Certificate including form B
- Copy of the notification to the Coastal State
- If available, the acknowledgement of the Coastal State
- Per Voyage – Oil Price Cap Attestation (if applicable)

Signed: _____

Full name:

Position:

Dated:

Note: If the estimated time of arrival of an oil tanker at the location or area for the STS operations changes by more than six hours, the master, owner or agent of that oil tanker shall provide a revised estimated time of arrival to the Coastal State and MCI.

⁴ IMOs "Manual on Oil Pollution, Section I, Prevention" as amended, and the ICS and OCIMF "Ship-to-ship Transfer Guide, Petroleum", fourth edition, 2005.

⁵ IMOs "Manual on Oil Pollution, Section I, Prevention" as amended, and the ICS and OCIMF "Ship-to-ship Transfer Guide, Petroleum", fourth edition, 2005.

⁶ Revised Annex I of MARPOL chapters 3 and 4 (resolution MEPC.117(52)); requirements for recording bunkering and oil cargo transfer operations in the Oil Record Book, and any records required by the STS operations Plan.