

MCI Circular 327/2025

To: Tanker Owners, Commercial Operators, ISM managers, and MCI team.

Subject: Ship-to-Ship Transfers

Date: 24 November

Update and Revoke: Circular 22/2010 and Circular 297/2024

Online Forms: [STS Advanced Notification and Cargo Declaration Form.](#)

Summary:

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

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, Second Edition, 2025 (the Guide)

Key requirements are:

1. **STS Operations Plan (STSOP):** Every tanker must carry an STSOP written in the ship's working language; STSOP for oil tankers must be approved by an IACS RO ^[1].
2. **Qualified Personnel** ^[2]:
 1. Oil cargo ^[3] transfers must be supervised by a Person in Overall Advisory Control (POAC).
 2. Chemical and LNG/LPG cargo ^[4] transfers require an STS Superintendent (STSSI).

[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] As per qualifications detailed in 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

3. **Risk Assessment:** The transfer area must be assessed for safety based on guidelines from the IMO Manual^[5] and the OCIMF Guide.
4. **Advance Notification:**
 1. All tankers must notify Maritime Cook Islands at least 48 hours before the scheduled STS operations using the online form [STS Advanced Notification and Cargo Declaration Form](#).
 2. Oil tankers subject to regulation 42 of Chapter 8, MARPOL Annex I must notify 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 Paragraph No. 6.2.3.1 of the IMO Manual and by the Guide. The national contact point list for Coastal States is listed in MSC-MEPC.6/Circ.20 or its subsequent amendments.
 3. Tankers carrying out STS transfer involving other cargoes should check with Coastal State authorities about possible notification requirements.
 4. A copy of the coastal state's acknowledgment must be retained onboard by the Master.
5. **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 are 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.

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

CTA (Point of contact re circular): technical@maritimecookislands.com

[\[5\] Para 6.2.2.1 of the Manual](#)