

Isle of Man Ship Registry

WWW.IOMSHIPREGISTRY.COM

COMMERCIAL YACHT MASTER'S HANDBOOK



VERSION 8.1, FEBRUARY 2018

INTRODUCTION

This handbook is for the information of Masters and senior officers of vessels registered as commercial yachts which are compliant with the various versions of the Large Commercial Yacht Code.

The Isle of Man Government's Regulations which give effect to the 3rd edition of the Large Commercial Yacht Code (LY3) came into force on 23 January 2015. Provision is made within LY3 to add specific national requirements within a National Annex and the Isle of Man has produced its own National Annex which is set out in [MSN 054](#).

This handbook should answer most questions regarding Isle of Man Merchant Shipping Regulations, the National Annex and the administrative processes involved in running an Isle of Man-registered commercial yacht.

Masters and other seafarers serving on board Manx yachts are always welcome to contact the Isle of Man Ship Registry using the contact details below. We will always do our best to provide advice or support and to assist you in any way possible. Further information, including current legislation and advice, can be obtained by accessing the Ship Registry's website at:

<http://www.iomshipregistry.com>

Tel: +44 1624 688500

Emergency after hours contact number: +44 7624 493467

Postal address:

Isle of Man Ship Registry
St. George's Court
Upper Church Street
Douglas
Isle of Man
IM1 1EX
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Certified to the ISO9001:2015 and ISO14001:2015 Quality Standard

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Amendments

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1.00	8 th May 2005	Initial Version
2.00	14 th June 2006	Version 02
3.00	12 th April 2007	Version 03
4.00	14 th June 2010	Version 04
4.10	3 rd May 2011	Correction to Page 20
5.00	18 th August 2014	Version 05
6.00	23 rd January 2015	Version 06
7.00	13 th February 2017	Version 07
8.00	9 th September 2017	Version 08
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NOTE – DOCUMENT UNCONTROLLED WHEN PRINTED

1 COMMERCIAL REGISTRATION AND CERTIFICATION

A commercial yacht may hold either a commercial certificate of registry or a pleasure certificate of registry. If the yacht's owner wishes to change between commercial and pleasure mode, the Ship Registry must be contacted in the first instance using the email address registry.marine@gov.im.

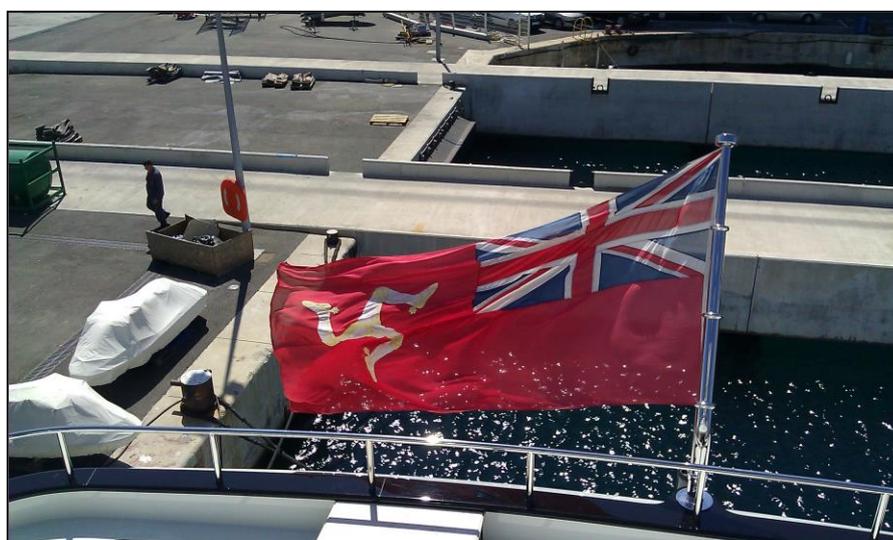
If the yacht is registered as a commercial yacht, the maximum number of fee-paying guests is 12, unless the yacht is anchored or alongside.

If the yacht is registered as a commercial yacht but is in pleasure mode, the following applies:

- the yacht's underlying registry will be 'commercial'
- no fee-paying guests can be carried
- surveys, including annual and intermediate surveys, must still take place in order to maintain the vessel's Class and statutory certification

All commercial yachts (in either commercial or pleasure mode) are issued with a certificate of compliance with the Large Commercial Yacht Code (either LY1, 2 or 3) along with Class, Load Line, SOLAS and MARPOL certification, as applicable to the vessel's tonnage. Relevant periodical surveys must take place as prescribed in the relevant conventions. If surveys are not completed within the relevant survey window, certificates become invalid which may result in the vessel being detained in port.

Section 9 of this handbook advises which body (flag/class) is responsible for completing which survey.



2 MARITIME LABOUR CONVENTION 2006 AND SEAFARERS' EMPLOYMENT AGREEMENTS

Commercial yachts registered with the Isle of Man, of any tonnage, are required to comply with the Isle of Man's legislation implementing the Maritime Labour Convention 2006 (MLC).

Yachts of 500GT and above require an MLC inspection and following a successful inspection a Maritime Labour Certificate will be issued, which includes a Declaration of Maritime Labour Compliance (DMLC) Parts I and II. The inspection schedule follows the same format as ISM and ISPS audits – interim, initial, intermediate and renewal inspections on a five year cycle. Further information on the certificate cycle for ISM/ISPS/MLC inspections is provided in Section 9 of this handbook.

Yachts of less than 500GT are also subject to MLC inspections which follow the same cycle of ISM/ISPS/MLC audits/inspection on ≥ 500 gt yachts. While such yachts do not require a Maritime Labour Certificate, the Ship Registry ensures that such vessels are issued with a DMLC Parts I and II in order to demonstrate clear compliance with the Convention to port State officials.

Specific areas covered during an MLC inspection include the following:

- Seafarers' minimum age, medical certification and qualifications
- Seafarers' employment agreements and the payment of wages
- use of any licensed, certified or regulated private recruitment and placement service
- manning levels and hours of rest
- accommodation, on board recreational facilities, food and catering
- health and safety, accident prevention and on board medical care
- on board complaint procedures

Interim MLC inspections

Interim MLC inspections may be required as follows:

a. Yachts of less than 500GT

Such yachts may undergo an interim MLC inspection when the yacht is delivered or when a yacht is registered with the Isle of Man.

A yacht of less than 500GT may also require an interim MLC inspection when a new shipowner (or a new body appointed by the shipowner) assumes responsibility for the operation of an MLC-compliant yacht. The Ship Registry must be contacted prior to the new shipowner assuming responsibility to arrange for the inspection to be carried out.

There is no requirement for yachts of under 500GT to be issued with an interim (or full term) MLC Certificate. In order for these yachts to demonstrate that the interim inspection

has taken place, a letter will be issued by the Ship Registry confirming the interim inspection date and stating the date by which the initial MLC inspection must be completed, which must be completed within six months of the interim inspection.

b. Yachts of 500GT or over

A yacht of 500GT or over may undergo an interim MLC inspection when the yacht is delivered or when a yacht is registered with the Isle of Man.

Such a yacht may also require an interim MLC inspection when a new shipowner (or a new body appointed by the shipowner) assumes responsibility for the operation of the yacht.

The interim MLC inspection will be carried out alongside the interim ISM & ISPS audits. Following a successful interim inspection, the yacht will be issued with an interim MLC certificate which is valid for six months.

In either case, the Ship Registry may delegate the interim MLC inspection to the ship's Classification Society and the Ship Registry will attend within six months for the initial MLC inspection. During the interim MLC inspection, the attending inspector checks that:

- there are adequate procedures in place on board which will ensure, as far as is reasonable and practical, compliance with the Articles, Regulations and Part A of the MLC Convention
- The Master is familiar with his/her associated duties and responsibilities.



The inspector will also verify that relevant information has been submitted to the Ship Registry in order for the DMLC Part II to be drafted and approved.

Following the interim inspection, the shipowner must ensure that the approval process for the DMLC Part II is completed and that the approved document is placed on board prior to the *initial* MLC inspection.

Initial MLC Inspections

An initial MLC inspection must be completed within six months of the interim inspection. It is not possible to extend this deadline.

During the initial inspection the surveyor uses the yacht's DMLC Part II to verify the requirements and procedures stated in Part II have been implemented on board. Following a

successful initial inspection:

- yachts of 500GT or over are issued with an MLC certificate harmonised with the yacht's Safety Management certificate
- yachts of less than 500GT are issued with a DMLC Parts I and II together with a letter confirming the due date of the next MLC inspection

Shipowner

Under MLC, a new word was added to the English language – 'shipowner'. The Shipowner bears ultimate responsibility for all aspects of the working and living conditions of seafarers employed on board, irrespective of who may actually employ them or own the yacht on which they work. Under MLC, the term shipowner means:

- the owner of the vessel, or
- another organization or person (manager, agent etc.) who has assumed responsibility for the operation of the vessel from the owner and who, on assuming such responsibility, has agreed to take over the duties and responsibilities imposed on shipowners in accordance with MLC, regardless of whether any other organisation or persons fulfil certain of the duties or responsibilities on behalf of the shipowner

Declaration of Maritime Labour Compliance (DMLC)

A DMLC is issued to all Isle of Man registered commercial yachts, irrespective of tonnage. This document specifies how MLC is applied on board the yacht. The attending flag and port State surveyors will use the DMLC as a starting point to verify that the yacht, its crew and MLC-related documents comply with requirements. The DMLC is divided into two parts:

- [Part I](#) is issued by the flag administration and details how the requirements of the Convention are interpreted and applied by the yacht's flag
- [Part II](#) is issued by the shipowner and details how the shipowner complies with relevant requirements. The Part II must be approved by the flag administration

Seafarer

MLC 2006 defines a seafarer as '*any person who is employed or engaged or works in any capacity on board a ship to which this Convention applies.*' Since 2006 ILO has applied further interpretation of this definition:

Seafarers are persons who regularly spend more than short periods on board.

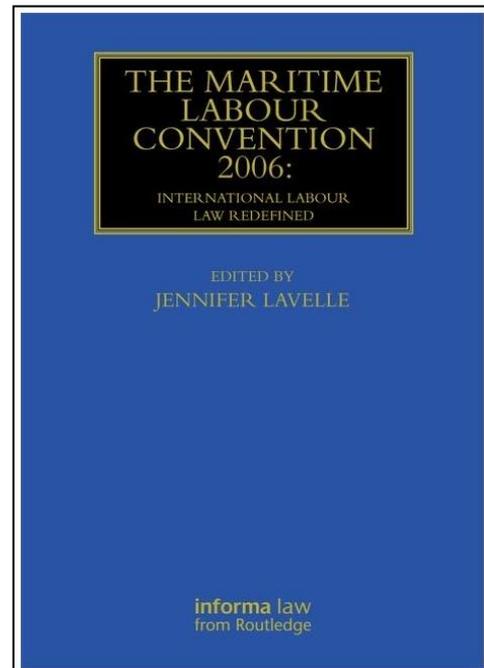
Seafarers are not persons whose work is not part of the routine business of the yacht and whose principal place of work is ashore, e.g.: harbour pilots, inspectors, superintendents, scientists, researchers, divers and specialist offshore technicians.

Those persons working on an occasional and short-term basis for example, fitters, repair technicians, surveyors, port workers or day workers who do not stay on board the yacht overnight are also not considered to be seafarers.

Using this interpretation the Ship Registry has determined that occasional workers such as harbour pilots, inspectors, superintendents, scientist, researchers, divers and specialist technicians that only work on board only for short periods of time are not seafarers. This is because their normal place of work is onshore - they are on board for only short periods of time (for example for two or three weeks) and have no emergency duties.

While occasional workers are not seafarers, they are still working on the yacht and must:

- receive familiarisation training on board (responsibility of the yacht)
- be assigned a berth and given access to mess areas and sanitary facilities (responsibility of the yacht)
- be at least 16 years of age (responsibility of the employer)
- be medically fit to carry out their duties, although a seafarer's medical fitness certificate is not required (responsibility of the employer)
- be self-sufficient in an emergency situation
- not be required to pay for food or medical care on board, or of their return travel from the yacht to their normal place of work/home (responsibility of the yacht)
- have evidence that they have been issued with a contract of employment with broadly equivalent provisions to a Seafarers' Employment Agreement. It is recommended the contract make reference to working in some capacity on board the yacht - this could be an addendum to the employee's shore-based contract (responsibility of the employer and yacht)
- be aware that health and safety legislation applies (responsibility of the yacht)



It is recommended the Master includes occasional workers on the crew list (IOMLOC), named as such (or simply as 'researcher' or 'technician') - visiting port officials may wish to see confirmation that such occasional workers are not passengers.

Seafarers' Employment Agreements

Amongst other changes brought about by MLC, a completely different contractual environment now exists under which all seafarers are required to be issued with a Seafarer's Employment Agreement (an 'SEA'). This is a personal contract between the seafarer and shipowner. The SEA sets out the principal terms and conditions of a seafarer's employment.

MLC requires seafarers working on commercial yachts to have a Seafarers' Employment Agreement signed by both the seafarer and the shipowner or a representative of the shipowner. Both the seafarer and the shipowner must have an original SEA. An original SEA (or a copy) is required to be retained on board.

Collective agreements are contractual agreements between a shipowner and a recognised seafarers' union and may be incorporated into an SEA.

Seafarers are often legally employed by a body other than the shipowner - an employment business, for example, possibly one set up by the shipowner dedicated to crewing a single or small number of yachts. Under such circumstances, the employment business may sign a seafarer's SEA and evidence should be available on board confirming that the shipowner has authorised the employment business to sign SEAs with respect to service on the yacht.

An employer other than the shipowner may also be directly responsible for meeting some of the obligations placed on the shipowner by an SEA (e.g. repatriation, payment of wages, etc.). Final responsibility, however, falls upon the shipowner should the direct employer of the seafarer fail to meet these obligations.

MLC Amendments 2014

The 2014 Amendments to MLC entered into force on 18th January 2017. The amendments contain additional provisions for shipowners insurance in respect of abandoned seafarers and shipowners' liability in respect of claims for sickness and injury. [MLN 7](#) contains further information.

Further guidance

For guidance on every aspect of MLC, the Isle of Man Ship Registry has issued a series of Maritime Labour Notices (MLNs) which are available on the [MLC section of the Ship Registry website](#). Shipowners and Masters are urged to download and review the information as they contain advice on such issues as annual leave, young seafarers, repatriation and hours of work and rest. MLNs are written in a very readable format.

If you have any further questions regarding MLC, please feel free to contact the MLC team:

Tel: +44 1624 688500

Email: marine.mlc@gov.im or for questions specific to seafarers issues use seafarers@gov.im

3 OFFICIAL LOG BOOK & LIST OF CREW

All Isle of Man registered commercial yachts, apart from those navigating exclusively within 60nm of the Isle of Man, are required to carry and maintain the Isle of Man Official Log Book and List of Crew.

Official Log Book

The Official Log Book is a document of considerable importance to masters. The Official Log Book is an official channel of communication between the master and the Isle of Man Ship Registry and will inevitably be requested in any dispute or accident. It is therefore essential that the Official Log Book is regularly and correctly completed as required by the applicable regulations and [MSN 004](#).

Only one Official Log Book, Official Log Book (Passenger Ships) and List of Crew may be used at any time. Multiple Official Log Books or Lists of Crew are not permitted.

The image shows the cover of the 'ISLE OF MAN OFFICIAL LOG BOOK'. It features the coat of arms of the Isle of Man at the top left. The title 'ISLE OF MAN OFFICIAL LOG BOOK' is prominently displayed in green. Below the title is a table with the following structure:

Name of Ship	Port of Registry	Official Number
	Gross Tonnage	Net Tonnage
		IMO Number

Below this table is another section with three columns: 'Name of Master', 'Certificate of Competency Type / Number / Country of Issue', and 'Signature of Master'. There are several rows for entries. At the bottom, there are fields for 'Date and Place Log Book Opened' and 'Date and Place Log Book Closed'. A note at the bottom right states: 'This Log Book is to remain the property of the Isle of Man Ship Registry. Within 3 months of closing deliver to: Isle of Man Ship Registry, 17 Place St George's Court, Upper Church Street, Douglas, Isle of Man, IM1 1EX, British Isles.' There are also fields for 'Date' and 'Stamp'.

Format of the Isle of Man Official Log Book

Our Regulations require Isle of Man registered yachts to keep an Official Log Book in the format prescribed by [MSN 004](#). The format of the Official Log Book must be as published by the Ship Registry; this can be downloaded in electronic format, or a hard copy of the Log Book can be purchased by contacting our registry team.

Masters using the electronic version are advised to compile their own folder and insert the pages as required in the various Official Log Book sections. Loose leaf pages are not to be completed electronically, they must be printed as blank pages and entries completed in handwriting.

No Official Log Book from any other organisation or Flag State authority may be used on an Isle of Man registered yacht.

Completion of Entries

Each entry in the official log book must:

- 1) be completed in English
- 2) be made in accordance with Chapter 2 and 3 of [MSN 004](#)

- 3) be signed and counter-signed by the signatories stated in Chapter 2 and 3 of [MSN 004](#) of this notice. Where a counter-signature is required the counter-signing seafarer cannot be the same person as the signatory
- 4) be made as soon as is practicable after the occurrence to which the entry relates, unless specified otherwise in Chapter 2 and 3 of this notice
- 5) be true and not deliberately false or misleading.

Where an 'officer' is required to sign, 'officer' shall mean a seafarer with a valid STCW (Seafarers' Training, Certification and Watchkeeping Code) Certificate of Competency serving in a 'management level' or 'operational level' capacity on board as defined in Section A-I/1 of the STCW Code.

Entries required under the MARPOL 73/78 Convention

It is recommended the following records required under the MARPOL Convention are completed in a separate record book in the format prescribed by the International Maritime Organisation (IMO):

- MARPOL Annex I - Machinery Space Operations – Oil Record Book Part 1
- MARPOL Annex I - Oil Cargo – Oil Record Book Part 2
- MARPOL Annex II - Noxious Liquid Substances in Bulk – Cargo Record Book
- MARPOL Annex V - Garbage – Garbage Record Book

(note: some of the above may not be applicable depending upon the yacht's tonnage)

The records stated above may, at the discretion of the master, be entered in the Official Log Book Narrative Section (section 8) in lieu of recording in a separate record book. Such entries must be in the format prescribed by the IMO. The record books stated above are not required to be submitted to the Isle of Man Ship Registry when the Official Log Book is closed unless specifically requested. Details regarding any accidental discharge of oil, garbage or noxious liquid substances must be entered in the Official Log Book narrative section as well as completing the [Accident Report Form \(ARF 1\)](#).

Closure of the Official Log Book

The Official Log Book and List of Crew must be closed and returned to the Isle of Man Ship Registry when:

- 1) the official log book has been open for a period not exceeding 12 months
- 2) the yacht deregisters from the Isle of Man Ship Registry

The Official Log Book and List of Crew must be returned to the Ship Registry within 3 months of being closed. When they are closed a new Isle of Man Official Log Book and List of Crew must be opened on the same day.

Loss of the Official Log Book

If any part of the Official Log Book, Official Log Book (Passenger Ships) or List of Crew is lost the master must open a new Official Log Book, Official Log Book (Passenger Ships) or List of Crew and make a written statement in the Official log Book narrative section of the circumstances and any steps for its recovery. The statement must be counter-signed by another officer. The master must also inform the Isle of Man Ship Registry as soon as practicable.

List of Crew

All Isle of Man registered commercial yachts, apart from those navigating exclusively within 60nm of the Isle of Man, are required to carry and maintain a List of Crew.

1) A List of Crew must contain the following information about the yacht:

- (a) name
- (b) port of registry
- (c) IMO number, or for yachts which don't have an IMO number the Official Number

2) Subject to paragraph (3), a list of crew must contain the following information for each seafarer on board the yacht:

- (a) name and address
- (b) date of joining the yacht
- (c) name and relationship of next of kin and address of next of kin if different from the seafarer
- (d) capacity employed on board the yacht
- (e) date and place the seafarer left the yacht and the reason for leaving

The List of Crew may be completed in paper or electronic format. Masters may use Form [IOMLOC](#) for the List of Crew as set out below or any other bespoke format provided it contains at least the information specified above. The Form [IOMLOC](#) is also available on the Ship Registry website. A List of Crew in electronic format must have an adequate backup facility.

Vessel's Name		Port of Registry	IMO Number (or Official Number)	
Ref No.	(a) Name of Seafarer	(c) Address of Seafarer	(e) Date of commencement of employment on board	Reason for leaving the ship
	(b) Capacity on board	(d) Name and relationship of next of kin and address if different from above	(f) Date and place of leaving the ship	
	(a)	(c)	(e)	
	(b)	(d)	(f)	
	(a)	(c)	(e)	
	(b)	(d)	(f)	
	(a)	(c)	(e)	
	(b)	(d)	(f)	
	(a)	(c)	(e)	
	(b)	(d)	(f)	
	(a)	(c)	(e)	
	(b)	(d)	(f)	
	(a)	(c)	(e)	
	(b)	(d)	(f)	

The List of Crew must be opened and closed at the same time as the Official Log Book up to a maximum period of 12 months. On closure of the Official Log Book the List of Crew must be delivered within 3 months to the Isle of Man Ship Registry.

Each seafarer's details must be entered on each occasion the seafarer joins and leaves the yacht. It is not permitted to have one entry for the duration of the seafarer's employment agreement unless written permission is granted by Isle of Man Ship Registry. A master may refer to a seafarer in the official Log Book by using the unique reference stated on the List of Crew. It is recommended that the details of non-seafarers contracted to be on the yacht when the yacht sails from the port as part of their work such as superintendents, riding squads, 'supernumeraries', nannies and security personnel etc. are also included on the List of Crew so there is a record of their next of kin in case of emergency. The List of Crew should not be confused with the yacht's Crew List which is normally presented to port authorities on arrival.

Further guidance

[MSN 004](#) - Isle of Man Official Log Book and List of Crew

[MSN 036](#) - MARPOL Annex I and Changes to the Oil Record Book Parts I and II

4 PUBLICATIONS TO BE CARRIED

The following list is provided to Masters and crew for guidance on documents, manuals and publications the provision of which is a statutory requirement on yachts registered with the Isle of Man. This is applicable to all yachts except where specified otherwise.

- Manx Shipping Notices and Maritime Labour Notices
- Stability information booklet (intact – all yachts; damaged – all yachts except short range)
- Record of light ship check (required every 5 years in accordance with [MSN 037](#))
- Placards, garbage management plan ($\geq 100\text{GT}$ or ≥ 15 persons) and record book ($\geq 400\text{GT}$)
- Large Commercial Yacht Code (applicable version plus LY3)
- SOPEP (yachts $\geq 400\text{GT}$)
- GMDSS Radio Log Book
- Oil Record Book Part 1 ($\geq 80\text{GT}$)
- Nautical publications (paper or electronic) applicable to the area of operation:
 - International Code of Signals (a statutory requirement)
 - Navigation charts, sailing directions, Lists of Lights and Lists of Radio Signals, corrected as necessary (weekly when possible) with Notices to Mariners
 - Mariners' Handbook
 - Operational and maintenance instructions for navigational aids carried by the yacht
 - IAMSAR Volume III Manual
 - Nautical Almanac
 - Tide tables
 - Tidal stream atlas
 - Navigational tables
- Official log book and list of crew
- Fire and LSA training manuals
- ITU publications ($\geq 300\text{GT}$)
- Instructions for the on board maintenance of life-saving and fire-fighting appliances
- Information for Radio Installation (GMDSS)
- Code of Safe Working Practice for Merchant Seamen
- Compass deviation record book
- Record of last overhaul of LSA launching appliances (annual and 5 yearly inspection)
- Ship Energy Efficiency Management Plan (SEEMP) (yachts $\geq 400\text{GT}$)



Notes

1. **Mariner's Handbook:** a compendium of essential maritime information on charts, operations and regulations, tides, currents and characteristics of the sea, basic meteorology, navigation in ice, hazards and restrictions to navigation, and the IALA Buoyage system.
2. **Sailing Directions:** often referred to as Pilot Books, Sailing Directions are designed for use by mariners on all classes of vessel with essential information on all aspects of navigation.
3. **Lists of Radio Signals:** comprehensive information on all aspects of Maritime Radio Communications.
4. **Lists of Light and Fog Signals:** this series of books provides extensive information on all lighthouses, lightships, lit floating marks (over 8m in height), fog signals and other lights of navigational significance.
5. **IAMSAR Volume III manual:** guidelines on search and rescue.
6. **Notice to Mariners:** contains all the corrections, alterations and amendments for the UKHO's worldwide series of Admiralty Charts and Publications.
7. **Navigational Tables:** e.g. Norie's Nautical Almanac.
8. **Isle of Man Acts and Regulations** – while there is no requirement to carry these on board the yacht, it is strongly recommended that Isle of Man Merchant Shipping Notices, Maritime Labour Notices and Industry Circulars are carried, in either paper or electronic form. All are available to download from the Isle of Man Ship Registry's website.
9. **GMDSS radio log book:** While operational, all Manx commercial yachts are required to keep a record of communications at least including the following:
 - a summary of communications relating to distress, urgency and safety traffic and the times of such communications,
 - a record of important incidents connected with the radio service and the time of such incidents,
 - where appropriate, the position of the yacht at least once in every day and the time that the yacht was in that position, and
 - the results of required **daily, weekly** and **monthly** tests.

The Master is required to inspect and sign each day's entries in the radio log.

Clear instructions for the maintenance of the log are contained within the radio log book itself. New log books can be forwarded to vessels from this office.

Radio log books should be returned to this office once the last entry is made together with the official log book and list of crew.

10. Oil record book (Part I): MARPOL Annex I applies to all vessels and requires that **all vessels of 400GT and above** maintain an oil record book part 1, covering machinery space operations.

Isle of Man Regulations additionally require **all vessels of 80GT and above** to maintain an oil record book part 1, covering machinery space operations.

- The oil record book shall contain entries relating to:
- ballasting or cleaning of oil fuel tanks
- discharge of ballast or cleaning water from oil fuel tanks
- disposal of oily residues (sludge) and discharge overboard of bilge water which has accumulated in machinery spaces
- bunkering operations, and
- accidental discharges of oil

Operations which require recording are listed in the first few pages of the oil record book.

It is essential that oil record books be regularly, correctly and accurately maintained as **they are frequently scrutinized by port state authorities** while checking for possible illegal discharges. In particular, there should be no blank lines in the book and all entries must be signed.

Oil record books can be obtained from the Isle of Man Ship Registry and completed books shall be kept for a period of 3 years after the last entry. Alternately an oil record book issued by another Administration can be used provided it is compliant with MARPOL Annex 1 and is in English. Oil record books are not required to be returned to this office.

Further guidance

[MSN 036](#) - MARPOL Annex I and Changes to the Oil Record Book Parts I and II

5. LONG RANGE IDENTIFICATION AND TRACKING (LRIT)

All commercial yachts of 300GT and above are required to be fitted with a Long Range Identification and Tracking system (LRIT).

Once the system has been commissioned, the yacht must request a Conformance Test Report certificate and must send a copy of this to the Ship Registry so that the yacht can be included in our LRIT tracking system.

Ceasing LRIT transmissions

In general, all commercial yachts of 300gt and above must transmit LRIT information and therefore you should not switch off the LRIT units or reduce the frequency of transmission except in very specific circumstances, which are detailed below.



Such exceptional circumstances are limited to the following, and require the permission of the Ship Registry to cease transmissions:

- a) When the yacht is in dry-dock or undergoing modification in a shipyard or port for a period where frequent interruption of the system would cause undue problems
- b) When the yacht is to be placed in lay-up permission may be given to reduce the transmission rate or to stop transmission during the lay-up period.

Applications to reduce or terminate transmissions should be made to marine.survey@gov.im. If permission is granted, an entry is to be made in the official log book indicating the time and date the unit was switched off and a corresponding entry made when the unit is re-started. The Master should also inform the local Port State Authority of the yacht's intent to cease transmitting LRIT information.

An exception to the above applies where the Master determines that the transmission of LRIT information compromises the safety or security of his or her yacht. In such circumstances the Master has the discretion to temporarily switch off the LRIT system. It must be switched back on as soon as the threat as passed.

Further guidance

[MSN 028](#) - Long-Range Identification and Tracking of Ships - "Conformance Test Report"

[MSN 032](#) - Long-Range Identification and Tracking of Ships

6. SAFETY OFFICIALS AND SAFETY COMMITTEE MEETINGS

Introduction

Every person on board a yacht has a responsibility for safety. Manx Merchant Shipping legislation provides for specific responsibilities for personnel on board to ensure the safety of those on the yacht. A yacht's safety culture is dependent upon high standards of safety which can only be achieved by strong support from the yacht's senior management.

Responsibilities of the shipowner and the Master

It is very important that the Master takes a close interest in the work of the safety officials. The Master should check that the Safety Officer is fulfilling his or her responsibilities effectively, while giving support and encouragement. The Master is the best person to ensure that the safety committee works successfully by encouraging all crew to participate in the yacht's safety culture.

The shipowner and the Master must facilitate the work of the safety officer, safety representatives and the safety committee in carrying out their occupational health and safety functions, and in particular:

- Provide access to any necessary information, documents and similar material including any relevant legislation, relevant Manx Shipping Notices or Maritime Labour Notices and the Isle of Man Ship Registry's Health and Safety Guidelines
- Inform the safety officer, safety representatives and safety committee of any hazards on board the yacht known to them which may endanger the yacht or a seafarer
- Ensure that information concerning the hazards, locations and necessary safety precautions is readily available to all seafarers and displayed prominently in easily accessible locations
- Provide, so far as is practicable, any reasonably necessary accommodation, office equipment supplies and similar materials
- Permit occupational health and safety inspections of any accessible part of the yacht
- Allow the safety officer and safety representatives any absence from yacht duties without loss of pay that may be necessary to enable them to fulfil their functions, or to undertake any necessary training on board in the exercise of their functions as safety officer or safety representative
- Display, in an easily accessible place easily accessible to seafarers, a notice listing the names of the safety officer and safety representative on board
- Receive and discuss, at any reasonable time, representations about health and safety from the safety officer, the safety representatives or the safety committee
- Specify in writing the reasons for refusing to implement any recommended occupational health and safety measures made by the safety officer, safety representative or the safety committee
- Provide upon request to the safety officer or representatives any information or plans necessary to enable them to undertake the investigations and inspections

Responsibilities of persons working on board

It is the responsibility of every person who is employed or engaged or works in any capacity on board a yacht to take care of the health and safety of him or herself and of any other persons on board the yacht who may be affected by his or her action or omission. They should inform the Master or safety officer of any matter or work situation considered a risk to health and safety.

Safety officer

Safety officers are required on all yachts. The safety officer is a person designated to take specific responsibility for the implementation of and compliance with the yacht's occupational health and safety policies and programmes. The safety officer may be the Master, however it is recommended that where possible this task is designated to another crew member as the Master already has duties under the health and safety Regulations. The Master is required to record the appointment of a safety officer in the official log book. The safety officer must have at least 2 years' sea service since attaining the age of 18.



There is no legal requirement for safety officers to be given any formal training, but they must be aware of their responsibilities and be effective in carrying them out. To ensure this is achieved it is recommended that the safety officer attend either an onboard training scheme or a shore-based course to give them an understanding of their duties. Onboard training schemes may be computer-based training, understudying the existing safety officer, or the receipt of information and instruction.

Safety Officer's duties:

- Investigation of every accident and marine incident
- Investigation of complaints by seafarers about occupational health and safety
- Investigation upon request by the safety committee
- Occupational health and safety inspections
- Ensuring deficiencies are reported
- Improving the standard of safety consciousness among seafarers
- Ensuring the records of each safety committee meeting are accessible to all crew on the yacht

Safety representative(s)

On every yacht in which there are five or more seafarers a safety representative must be either elected or appointed.

A safety representative may only be elected or appointed if they have at least 2 years' sea service since attaining the age of 18.

On yachts with 16 or more seafarers a safety representative must be elected or appointed for each department and as a minimum this must include a safety representative for the deck and engine departments. When there is a substantial change in the number of crew, the Master should remind personnel of their right to elect new safety representatives. The Master is required to record the appointment of a safety representative in the Official Log Book.

Powers of a safety representative

- Participate, subject to the agreement of the safety officer, in any investigation or inspection carried out by the safety officer
- Undertake investigations or inspections whether or not such investigations or inspections have already been carried out by the safety officer
- Inspect any records the safety officer is required to make
- Attach any comments to any accident report which is required to be submitted

Please note that the roles of safety representative and safety officer cannot be fulfilled by the same crew member.

Safety committees

Once the safety officials have been appointed or elected, the Master must appoint a safety committee which shall include the safety officer and any safety representatives. The Master must be the Chairman of the safety committee. The safety committee may hold meetings at such intervals as it decides but such intervals must not be greater than 6 weeks. The appointment of every safety committee must be recorded by the Master in the official log book.

Safety committees are required to –

- Make representations and recommendations on behalf of the seafarers to the shipowner on matters affecting the occupational health and safety of seafarers
- Inspect any of the records required to be kept by the safety officer
- Ensure the yacht's occupational health and safety policies and programmes are observed, and make recommendations for their improvement
- Consider and take any appropriate action in respect of any occupational health and safety matters affecting the yacht and its seafarers
- Keep a record of the minutes of the meeting which shall include any conclusions made, any representations made to the Master or the safety committee, any replies made, and any actions that follow

Further guidance

Refer to MLN 4.3 for further guidance on compliance with the Isle of Man's Health and Safety legislation. Included within MLN 4.3 are:

- [MLN 4.3 \(A\)](#) Health and Safety Policies and Programmes
- [MLN 4.3 \(B\)](#) Health and Safety (vibration)
- [MLN 4.3 \(C\)](#) Health and Safety (noise)
- [MLN 4.3 \(D\)](#) Health and Safety (hazardous chemical agents)
- [MLN 4.3 \(E\)](#) Reporting of Occupational Accidents, Incidents and Diseases

7. ACCIDENT REPORTING

Whilst it is appreciated that your ISM or Mini-ISM system has a procedure covering casualties, accidents and incidents on board, there is also a requirement in law for the Master or Company to report these to the Ship Registry by the most expeditious means possible.

The procedure for doing so depends upon whether the occurrence is classified as a Casualty, Accident or Incident (see below for guidance), but all should be reported to the Ship Registry using **either** our Accident Reporting Form [ARF 1](#) **or** your company accident form. In cases of serious or complex events, additional sheets may be attached to the ARF 1 providing further information. The Ship Registry will accept company specific accident report forms instead of the ARF 1, but if doing so please be aware it is possible the Ship Registry may request further information if not all of the necessary details are included.

The ARF 1 is used to gather the information regarding the type and cause of events on Manx yachts in order to report to IMO and to compile the statistics published in our annual report. All such information contained within the annual report is anonymous. The latest Annual Report may be downloaded from [the relevant section of Ship Registry website](#).

Reference No. -
(Ship Registry Use Only)

Accident Report Form

Isle of Man Government

Name of Ship: - IMO No.

Date of Accident: - Location of the Ship at the time of the Occurrence

Classification of the Occurrence
(Casualty, Accident or Incident?)

Details of Personnel Involved in the Casualty

Number of persons Killed

Number of Persons Injured

Was the Accident caused mainly by persons other than the ships crew? Yes / No
For Example shore personnel, stevedores, persons on another vessel

Notes

1. Any Occurrences involving any of the following **MUST BE CLASSIFIED AS A CASUALTY**

Damage to the ship, its equipment or fittings, which requires immediate repair before the ship can continue in service, or a breach of the hull, or cracking of the primary structure.

Damage to equipment or machinery which has been identified as Safety Critical and prevents the ship from being operated as designed.

Loss of life or serious injury to any person

Major damage to the environment.

An ACCIDENT is less serious than a casualty and includes falls overboard, small fires and explosions, machinery failures etc. An INCIDENT is the least serious and covers near misses, which could have led to accidents or casualties.

Full Reporting requirements are contained in Marn Shipping Notice No. 1

Name of Person Making Report Signature (if submitted by Post or Fax)

Rank

Date

Form ARF 1 11/01/07 Page 1

Classification of Events

Casualties are the most serious occurrences, where one or more of the following occurs:

- the death of a person, or major injury to a person
- serious harm to the environment
- loss of a yacht or the abandonment of a yacht
- material damage to a yacht
- the grounding of a yacht or any collision, or a yacht is disabled
- material damage caused by or in connection with the operation of a yacht

Accidents are where one or more of the following occurs:

- any fracture (other than fingers/toes)
- any loss of a limb or part of a limb
- dislocation of the shoulder, hip, knee or spine
- loss of sight (temporary or permanent)
- penetrating eye injuries

- other injuries leading to hypothermia or unconsciousness, requiring resuscitation, or admission to hospital or an offshore sick bay for more than 72 hours.

Incidents are the least serious occurrences and include all other events which are not classified as casualties or accidents. These also include near misses or events which could have led to accidents or casualties.

Reporting Requirements

In the case of a **Casualty**, you are required to notify the Ship Registry as soon as possible that a casualty has occurred and provide an overview of the circumstances of the event. The Ship Registry will then advise on a case by case basis precisely what information is required from the Master or Shipowner. As a minimum, this will need to include sufficient information to enable the following to be identified (where appropriate):

- the location, time and weather, sea and tide conditions
- the condition of the yacht – e.g. draught, loading condition, cargo etc.
- third party involvement – e.g. pilots, other ships, tugs, etc.
- the yacht's course, track, speed, status of navigational aids and steering
- main engine and auxiliary machinery status

Casualties can be reported on the ARF 1, however it is unlikely that it will be possible to include all of the necessary information on the ARF 1. Where this is the case additional sheets may be attached to the ARF 1.

The Ship Registry will generally investigate casualties that involve or take place on Manx yachts. The scale of the investigation will depend upon the seriousness of the casualty and on whether or not the event appears to present a safety issue that may require safety improvements on other ships.

It is likely that the authorities belonging to the country where the incident occurred will also investigate a casualty. For this reason it is essential that the Ship Registry understands the circumstances quickly so it can negotiate with the local authorities on the scale of the investigation and the share of responsibilities.

If the Ship Registry decides to conduct a full investigation it will send one or more investigating surveyors to your yacht as quickly as possible. Until the investigating surveyor arrives at the scene and while the investigation is ongoing, it is the duty of the Master and the shipowner to preserve all evidence and records to the best of their ability.

The powers of the investigating surveyor include, but are not limited to, collecting evidence, interviewing crew members, taking photographs, collecting documents and downloading VDR data. It is an offence in law to impede the investigating surveyor. The purpose of any such investigation is to establish the circumstances and causes of the casualty with the aim of improving the safety of life at sea and the avoidance of casualties in the future. It is not

the purpose of the investigation to apportion liability, nor to apportion blame, except so far as is necessary to achieve the fundamental purpose. Any statements made during the course of the investigation will be confidential to the Ship Registry and cannot be used for any other purpose.

Accidents must be reported to the Ship Registry (on form ARF 1 or company specific form). The completed accident report form has to be reported to the Ship Registry within 24 hours of the yacht's arrival at its next port after the accident.

The Ship Registry records all accidents in its database and uses the information to analyse accidents and their causes across the whole Isle of Man fleet with a view to identifying any safety measures necessary to mitigate the risks of future accidents.

Incidents must be reported to the Isle of Man Ship Registry on Form (on form ARF 1 or company specific form) before departure from the next port. As with Accidents, Incidents will be recorded within the Ship Registry database for analysis purposes.

Further guidance

[MSN 003](#) – Accident Reporting

8. HOURS OF REST

Isle of Man requirements

The Maritime Labour Convention 2006 (MLC) requires each Member State fix maximum hours of work or minimum hours of rest for a given period of time for all seafarers. To meet this requirement, the Isle of Man Ship Registry has prescribed the following minimum hours of rest:

- 10 hours rest in any 24 hour period, which may be divided into no more than 2 periods, one of which must be at least 6 hours in length
- 77 hours rest in any 7 day period
- no more than 14 hours between any consecutive rest periods.

'Hours of rest' means time outside hours of work and does not include short breaks.

Please note that the exceptions to the hours of rest introduced by the 2010 STCW Manila Amendments are not recognised by the Isle of Man Ship Registry.

Master's responsibility

In addition to the responsibility of the shipowner to ensure compliance with these requirements, it is also the responsibility of the Master to ensure:

- each officer in charge of a watch, or rating forming part of a watch, is sufficiently rested before taking up any watchkeeping duties
- the watchkeeping arrangements are adequate for the maintenance of a safe watch at all times
- the yacht does not sail from any port unless those seafarers who will be in charge of a watch immediately after sailing have received rest sufficient to allow them to maintain a safe watch



Drills and periods on call

It is appreciated that some seafarers will be off duty when musters, fire-fighting and lifeboat drills are conducted, but these should be arranged in a manner that minimises the disturbance of rest periods and not induce fatigue.

When a seafarer is on call, such as when a machinery space is unattended, the seafarer must have an adequate compensatory rest period if the normal period of rest is disturbed by a call-out to work.

Table of yachtboard working arrangements

The shipowner is required to draw up, in consultation with the Master, an 'hours of rest schedule' showing the maximum watch periods and minimum rest periods to be observed by crew members. The schedule may be changed only after consultation with the Master. The shipowner has a duty to ensure that sufficient personnel are provided so that compliance with the rest periods is possible. The hours of rest schedule must be posted in a place accessible to all the crew.

The following page provides a model table for indicating required working hours.

SHIPBOARD WORKING ARRANGEMENTS

Name of ship:	<i>Chameau Doré</i>	IMO number:	<i>9100101</i>			
A copy of the regulations on hours of rest in force for this vessel can be found at:				<i>Refer copy stored on yacht's S-drive</i>		
Details of any equivalent arrangements set out in a collective agreement for the vessel:				<i>None</i>		
A copy of any equivalent arrangements set out in a collective agreement in place on this vessel can be found at:				<i>Not applicable</i>		
Position / Rank	Scheduled daily work hours at sea		Scheduled daily work hours in port		Total hours of work at sea	Total hours of work in port
	Watchkeeping duties (from – to)	Non-watchkeeping duties (from – to)	Watchkeeping (from – to)	Non-watchkeeping (from – to)		
Master	0400-0800 1600-2000	0800-1000		0800-1700	10	9
Ch. mate	0800-1200 2000-0000	1200-1400		0800-1700	10	9
2 nd mate	0000-0400 1200-1600	0400-0600		0800-1700	10	9
Ch. eng	0600-1800			0800-1700	12	9
2 nd eng	1800-0600			0800-1700	12	9
Chef	0800-1400 1600-2100			0800-1400 1600-2100	11	11
Stew 1	0800-1400 1700-2200			0800-1400 1700-2200	11	11
Stew 2	0800-1400 1700-2200			0800-1400 1700-2200	11	11
Deckhand 1	0400-0800 1600-2000			0800-1700	8	9
Deckhand 2	0800-1200 2000-0000			0800-1700	8	9
Deckhand 3	0000-0400 1200-1600			0800-1700	8	9
Signature of Master:					Date:	

Recording hours of rest

A record must be kept of each seafarer's daily hours of rest, the principal purpose being to allow monitoring and provide documentary evidence of compliance with the minimum hours of rest requirements, and to record any deviations from the requirements.

Records must be maintained in English and be available for inspection by Isle of Man Ship Registry inspectors and port State control officers. Each seafarer shall receive a copy of the records, generally monthly, pertaining to him or her, which must be endorsed by the Master, or a person authorised by the Master, and by the seafarer. Records should be kept on board for 3 years to ensure that full records are available between MLC inspection dates.

We are aware that increasingly yachts are keeping records in electronic format and this is a natural development. Shipowners may develop, or purchase, electronic systems that record the hours of rest for seafarers on their yachts.

The following table is a model format for recording hours of rest.

Exceptions to minimum hours of rest allowed under MLC.

The Isle of Man Ship Registry may permit exceptions to the required minimum hours of rest that have been either:

- produced as part of a collective agreement
- applied for by the shipowner with evidence that the requested exception has been agreed by the seafarers and/or the seafarers' representatives

The exceptions must, as far as possible, follow the Isle of Man requirements relating to the minimum hours of rest in the Merchant Shipping Maritime Labour Convention Regulations 2013, but may take account of:

- a. more frequent or longer leave periods
- b. the granting of compensatory leave for watchkeeping seafarers, or seafarers working on board yachts on short voyages

Further guidance

[MLN 2.3](#) - Hours of work and hours of rest

9. SURVEYS, SHIP REGISTRY SURVEYORS AND CLASSIFICATION SOCIETIES

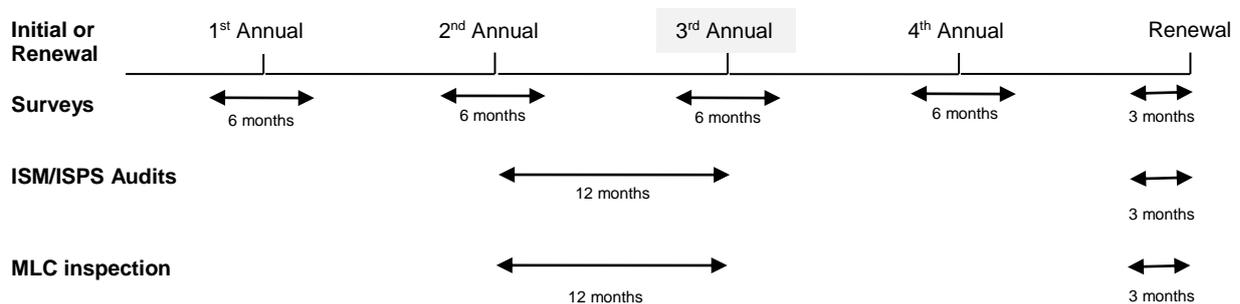
The Isle of Man Ship Registry is responsible for ensuring that vessels flying the Manx flag comply with all applicable international Regulations. To achieve this, an Isle of Man Ship Registry surveyor must visit every commercial yacht at intervals of not more than three years.

Certificate cycle

Please note the following points:

- Some statutory certificates do not expire (such include the International Tonnage Certificate and the International Energy Efficiency Certificate)
- Certificates which *do* expire are issued predominantly on a 5 year cycle. This cycle is generally based on the certificate's expiry date, not on the date it was issued
- A renewal survey is held at a maximum interval of 5 years
- Between renewal surveys, annual and intermediate surveys become due for most statutory certificates
- ISM/ISPS and MLC certificates do not require annual audits. Instead, intermediate audits are conducted between the second and third anniversary of the expiry date
- A 'time window' exists for completing all surveys. For example, renewal surveys must generally be completed within the last 3 months of the cycle (an exception is the Class renewal (or 'Special') survey, parts of which can commence earlier than this. Annual surveys must be completed within 3 months either side of the anniversary date

The figure below illustrates:



What is the Master required to do?

It is the Master's responsibility to request the attendance of a surveyor (either IoMSR or Class, as applicable) to conduct surveys and audits when they become due. Please feel free to contact us to plan a survey schedule. Please be aware that you will not receive reminders from this office or from Class, warning when surveys are due. Should surveys not be carried out within the appropriate time window, the certificate(s) and commercial registry will become invalid. Advanced notice of when you require a surveyor is always appreciated.

Who carries out the audits and surveys?

When an Isle of Man Ship Registry surveyor visits the yacht, the visit should generally be arranged to coincide with the 2nd or 3rd Large Commercial Yacht Code annual survey and with the renewal survey.

At this time, the surveyor will also complete the ISM & ISPS audits (if the yacht is over 500GT) and the MLC inspection. Costs for these visits are included in charges levied in association with the Commercial Yachts Fees Scheme, hence the attendance of an IOM surveyor may save the Master time and will certainly save the owner money.



All other surveys are delegated to the vessel's Classification Society. Shortly after registration, the Ship Registry will supply the yacht with a letter and a 'Surveyor Appointment' for the attention of the attending Class surveyor. These documents should help to clarify the delegation to the attending surveyor and should be presented to him/her on arrival. Please keep them in a safe place - they should be retained on board and not removed by the Class surveyor.

The Class surveyor is authorised to endorse our certificates for completion of surveys as applicable.

Who is delegated the responsibility for inspecting helicopter landing areas?

An 'Aviation Inspection Body' is the body delegated the responsibility for inspecting helicopter landing areas on commercial yachts. The bodies currently delegated this responsibility by the Ship Registry are the Helideck Certification Agency or a nationally accredited civil aviation authority.

The table on the following page stipulates:

- which *certificates* are issued by the Ship Registry and which are issued by the yacht's classification society; and
- which *surveys* must be carried out by the Ship Registry and which have been delegated to the yacht's classification society

Survey and certification requirements

Certificate	Required for which yacht	Certificate issued by	Renewal survey conducted by	Annual/ Intermediate survey conducted by
Registry	All	IoM	-	-
Minimum Safe Manning	All	IoM	-	-
Tonnage	All	Class	-	-
Yacht Code	All	IoM	IoM	Class/ IoM
Classification	All	Class	Class	Class
Load Line	All	Class	Class	Class
Radio *	≥300GT	Class	Class	Class
Oil Pollution	≥400GT	Class	Class	Class
Air Pollution	≥400GT	Class	Class	Class
Energy Efficiency	≥400GT	Class	-	-
Sewage Pollution	>15 Persons, or ≥400GT	Class	Class	-
Safety Construction	≥500GT	Class	Class	Class
Safety Equipment	≥500GT	Class	Class	Class
ISPS	≥500GT	IoM	IoM	IoM
ISM	≥500GT	IoM	IoM	IoM
MLC	≥500GT	IoM	IoM	IoM
DMLC Part I and II	All	IoM	IoM	IoM
LRIT Conformance Test Report	≥300GT	Application Service Provider	-	-
Anti-fouling Cert	≥400GT	Class	-	-
Declaration of Anti-fouling	≥24m & up to 400 GT	Owner/Manager	-	-
Nairobi Wreck Cert	≥300GT	IoM	-	-
Bunker Certificate	≥ 1000GT	IoM	-	-

* **Radio:** while vessels of <300GT do not require certification, *surveys* of GMDSS radio installations on such vessels are still required to be completed annually by a Class-approved radio surveyor. The relevant report should be retained on board as evidence that the survey has been completed.

We would appreciate receiving confirmation of completion of any Class survey - please email marine.survey@gov.im.

Certificate queries, extensions & temporary dispensations

Any queries or requests for extension of the above certificates must be made to the Isle of Man Ship Registry and not to Class. The Ship Registry is also responsible for the issue of any temporary dispensations.

Further guidance

None.

10. MANNING REQUIREMENTS

Manning on board

The following tables state the minimum crew complement and the minimum qualification requirements for the posts indicated on board commercial yachts of 24m in Load Line Length and above and under 3000GT.

Tables 1 & 2 detail the Isle of Man requirements and Table 3 clarifies the equivalent engineers' certification for each position.

There are a number of changes from the previous manning scales issued by the Isle of Man Ship Registry which augment engineers' required certification depending on their position on board the yacht. The changes include, in some cases, a requirement for engineers to attend an approved engine manufacturer's course appropriate to a yacht's engine type and power range.



Manning requirements for large commercial yachts over 3000GT will be considered on a case-by-case basis.

Abbreviations

- Master (Y) - Master (Yacht)
- YM Ocean - RYA/DTp Yachtmaster Ocean with Commercial Endorsement
- YM Offshore - RYA/DTp Yachtmaster Offshore with Commercial Endorsement
- OOW(Y) - Officer of the Watch (Yacht)
- MEOL(Y) - Marine Engine Operator License (Yacht)
- AEC - Approved Engine Course

Table 1

COMMERCIAL YACHTS UNDER 500 GRT and <3000kW

Miles from a safe haven	< 200GT	200 – 499GT
Up to 60	YM Offshore	Master (Y)
		Coastal skipper
	Engineer (AEC)	Chief Engineer (Y4)
		Engineer (AEC)
	One Yacht Rating	Two Yacht Ratings

Miles from a safe haven	< 200GT	200 – 499GT
Up to 150	YM Offshore	Master (Y)
	Coastal skipper	YM Offshore
	Engineer (MEOL (Y))	Chief Engineer (Y3)
		Engineer (MEOL (Y))
	One Yacht Rating	Two Yacht Ratings

Miles from a safe haven	< 200GT	200 – 499GT
Over 150	YM Ocean	Master (Y)
	YM Offshore	OOW (Y)
	Chief Engineer (Y4)	YM Offshore
	Engineer (MEOL (Y))	Chief Engineer (Y3)
		Chief Engineer (Y4)
	Two Yacht Ratings	Two Yacht Ratings

NOTE - see engineers' qualifications as detailed in **Table 3** for specific details of **additional requirements and agreed equivalents**.

Table 2

COMMERCIAL YACHTS 500 GT – 3000GT

Miles from a Safe Haven	500 – 3000GT < 3000 kW	500 – 3000GT 3000 kW to < 6000 kW	500 – 3000GT 6000 kW to < 9000 kW
Up to 60	Master (Y)	Master (Y)	Master (Y)
	OOW (Y)	OOW (Y)	OOW (Y)
	Chief Engineer (Y3)	Chief Engineer (Y2)	Chief Engineer (Y1)
	MEOL (Y)	MEOL (Y)	MEOL (Y)
	Two Yacht Ratings	Two Yacht Ratings	Two Yacht Ratings

Miles from a Safe Haven	500 – 3000 GT < 3000 kW	500 – 3000 GT 3000 kW to < 6000 kW	500 – 3000 GT 6000 kW to < 9000 kW
Up to 150	Master (Y)	Master (Y)	Master (Y)
	Chief Mate (Y)	Chief Mate (Y)	Chief Mate (Y)
	Chief Engineer (Y2)	Chief Engineer (Y2)	Chief Engineer (Y1)
	Chief Engineer (Y3)	Chief Engineer (Y3)	Chief Engineer (Y2)
	Two Yacht Ratings	Two Yacht Ratings	Two Yacht Ratings

Miles from a Safe Haven	500 – 3000 GT < 3000 kW	500 – 3000 GT 3000 kW to < 6000 kW	500 – 3000 GT 6000 kW to < 9000 kW
Over 150	Master (Y)	Master (Y)	Master (Y)
	Chief Mate (Y)	Chief Mate (Y)	Chief Mate (Y)
	OOW (Y)	OOW (Y)	OOW (Y)
	Chief Engineer (Y2)	Chief Engineer (Y1)	Chief Engineer (Y1)
	Chief Engineer (Y3)	Chief Engineer (Y3)	Chief Engineer (Y1)
	Two Yacht ratings	Two Yacht Ratings	Two Yacht Ratings

NOTE - see engineers' qualifications as detailed in **Table 3** for specific details of **additional requirements and agreed equivalents**.

Table 3
ENGINEER'S REQUIRED MINIMUM CERTIFICATION FOR COMMERCIAL MOTOR AND SAILING YACHTS

Area – miles from a safe haven	POSITION	<200GT		200-499GT		200-499GT		500-2999GT	
		<1500kW	<3000kW	< 3000kW	> 3000kW	<3000kW	<6000kW	<9000kW	
≤60	Chief engineer	AEC a	AEC a,b/MEOL a	Y3 / Y4 b MN III/1 MN 2/E III/3	Y3 c / Y4 b,c MN III/1 MN 2/E III/3	Y3 MN C/E III/3	Y2b MN C/E III/3 MN 2/E III/2 c	Y1 MN C/E III/2 MN 2/E III/2 c	
	Second/assistant engineer	N/A	N/A	AEC a	AEC a,c	MEOL a MN III/1	MEOL a MN III/1	MEOL a MN III/1	
≤150	Chief engineer	MEOL a,b / Y4 a	MEOL a,b / Y4 a	Y3 MN 2/E III/3	Y3 c MN 2/E III/3	Y2 MN C/E III/3 MN 2/E III/2 c	Y2b MN C/E III/3 MN 2/E III/2 c	Y1 MN C/E III/2 MN 2/E III/2 c	
	Second/assistant engineer	N/A	N/A	MEOL a	MEOL a,c	Y3 MN III/1 MN 2/E III/3	Y3 b MN III/1 MN 2/E III/3	Y2 b MN 2/E III/2	
>150	Chief engineer	Y4 MN 2/E III/3	Y4 b / Y3 MN 2/E III/3	Y3 MN C/E III/3	Y3 c MN C/E III/3	Y2 MN C/E III/3 MN 2/E III/2 c	Y1 MN C/E III/2 MN 2/E III/2 c	Y1 MN C/E III/2 MN 2/E III/2 c	
	Second/assistant engineer	MEOL a	MEOL a	Y4 a MN III/1 MN 2/E III/3	Y4 a,c MN III/1 MN 2/E III/3	Y3 MN III/1 MN 2/E III/3	Y3 b MN 2/E III/3 b	Y1/Y2 b MN 2/E III/2	

Notes

- a) Can be dual purpose (deck/engine) other than the master if the yacht has been assigned UMS notation **or** fulfils the following criteria:
 - the yacht has full bridge control of main engine manoeuvring;
 - the yacht is fitted with high level bilge alarms in machinery space; and
 - the engine room alarm system, including the fire alarm if fitted, is relayed to the accommodation and/or the bridge.
- b) Certificate holder is required to have an approved engine manufacturer's course appropriate to the engines' type and power range.
- c) In this position, holders of STCW III/2 second engineers' certificates of competency must have their certificates additionally endorsed with Chief Engineer III/2 (<3000GT, <9000kW) and limitation 'Yacht endorsement'.

1. Engineers

- i. Yachts fitted with two or more engines:
 - a. Yachts <500GT: on request, the Ship Registry may consider accepting chief or second/additional engineers, basing their Certificate of Competency ('CoC') on the output power of a single engine, provided that:
 - there is a simple engine room layout
 - the output power of a single engine does not exceed the maximum propulsion power as stated on the engineer's CoCIf this is accepted the Ship Registry will issue a 'letter of comfort'.
 - b. Yachts ≥500GT: total (combined) propulsion power is the deciding factor for the engineer's CoC.
- ii. Definition of Y1 – Y4: the limitations relevant to chief engineers on commercial yachts are stated on Certificates of Competency issued by the UK MCA. To find out equivalent 'Y' rating, cross reference limitations on CoC to MGN 156 section 1.7.
- iii. A deck officer with an AEC or MEOL qualification will be accepted for a dual engineering post requiring that qualification provided he or she is not the master and provided the minimum safe manning numbers are maintained. For yachts designated as short range yachts using the LY3 definition, the manning numbers will be considered on a case-by-case basis to allow the reduction of one crew member as long as the competency levels stipulated in Tables 1 or 2 are maintained.

2. Sailing yachts

In addition to the requirements stipulated in Tables 1–3, manning requirements for sailing yachts are as follows:

- i. yachts of <200GT require, as a minimum, an additional navigational watchkeeping officer issued with an RYA Coastal Skipper certificate of competency
- ii. an additional yacht rating shall be carried so that on yachts
 - <500GT, a minimum of two yacht ratings is provided
 - ≥500GT, a minimum of three yacht ratings is provided
- iii. on yachts equipped with a system permitting simple centralised sail operation, consideration will be given to reducing the number of yacht ratings stated in (ii) above;
- iv. on application, consideration will be given on a case-by-case basis to accepting engineers with lesser qualifications than those specified for motor yachts.

3. All seafarers

1. Original certification

All STCW certification or equivalent certification must be kept available in its original form on board the yacht.

2. Safety familiarisation training

All seafarers employed on the yacht must receive approved safety familiarisation training in personal survival techniques before being assigned any shipboard duties. This training applies to all seafarers including contractors but does not apply to passengers. This training will normally be conducted by the ship's safety officer although it will be for each operator to determine the system to be used on each yacht.

The extent of familiarisation training must ensure that each person is able to -

- a. communicate with other persons on board on elementary safety matters and understand safety information symbols, signs and alarm signals;
- b. know what to do if -
 - a person falls overboard
 - fire or smoke is detected, and
 - the fire or abandon ship alarm is sounded
- c. identify muster and embarkation stations and emergency escape routes;
- d. locate and don lifejackets
- e. raise the alarm and have basic knowledge of the use of portable fire extinguishers
- f. take immediate action upon encountering an accident or other medical emergency before seeking further medical assistance on board, and
- g. close and open the fire, weather-tight and watertight doors fitted in the particular yacht other than those for hull openings.



3. Minimum training

All seafarers employed on a yacht must have completed the four basic STCW courses, namely:

- personal survival techniques (STCW A-VI/1.2.1.1)
- fire prevention and firefighting (STCW A-VI/1.2.1.2)

- elementary first aid (STCW A-VI/1.2.1.3)
- personal safety and social responsibilities (STCW A-VI/1.2.1.4)

Seafarers with designated security duties must have evidence of training specific to their role (STCW A-VI/6.4). It should be noted that there are transitional provisions in place for seafarers who were employed prior to 01/01/2012 which allows them to use approved seagoing service as a means of satisfying this requirement. Please see [MSN 046](#) for further information.

The above also outlines what is required to fulfil the role of a yacht rating on a Manx yacht. Yacht ratings are also required to hold a valid medical certificate and the master must be satisfied that the person can fulfil their required roles on board.

4. Refresher training

The STCW Manila Amendments require that on or after 1 January 2017 all seafarers must have evidence of maintaining the required standard of competence for the training listed below every 5 years. The Ship Registry considers this to mean that either the full course must have been completed within the previous 5 years or, if the course was completed more than 5 years ago, the relevant refresher training must have been completed within the previous 5 years. The refresher training must be carried out to the satisfaction of an organisation authorised to issue STCW certificates of proficiency and may include additional shoreside training or evidence of relevant sea service.

This new requirement for refresher training applies to the following:

- personal survival techniques or basic sea survival
- fire prevention & firefighting
- survival craft and rescue boats other than fast rescue boats;
- fast rescue boats
- advanced firefighting

5. Medical care on board yachts

The Merchant Shipping (Maritime Labour Convention) Regulations 2013 state the requirements for the carriage of a qualified medical doctor or medically trained personnel on board ships, including commercial yachts. Further information is provided in MLN 4.1.

6. Ship Security Officer certificate of proficiency (STCW Reg. VI/5)

All yachts of 500GT and over must designate a crew member as the ship security officer (SSO) in accordance with the ISPS Code. The SSO must be issued with a certificate of proficiency in accordance with STCW Reg. VI/5 and section A-VI/5 of the STCW Code.

7. Security-related training and instruction for all seafarers (STCW A-VI/6.1)

Security training is required for seafarers serving on yachts required to comply with the

provisions of the ISPS Code (all commercially operated yachts of 500GT and over). Further information is available in [MSN 046](#).

8. IOM endorsement requirements

The Ship Registry does not issue its own Certificates of Competency but is required by regulation I/10 of the STCW Convention to issue an endorsement recognising a seafarer's national CoC. Endorsements are required for all officers sailing on IOM-registered yachts unless they hold a UK STCW, UK RYA Yacht or IYT Yacht CoC.

Officers serving on IOM-registered yachts may be of any nationality and any residency provided they are holders of a CoC issued by one of the STCW 'White List' countries recognised by the Isle of Man. This list is stated in [MSN 051](#) and all officers with a CoC issued by one of these countries must apply for an Isle of Man endorsement. If a seafarer holds a UK issued Certificate of Equivalent Competency they must still apply for an Isle of Man endorsement

There are three ways of submitting this documentation to the Ship Registry:

Online: Registered users can upload the above documentation to <https://mavis.iomshipregistry.com/formlogin.mth> once they have applied for a user account. A request to set up a user account should be sent to seafarers@gov.im including your name, e-mail address and preferred user name. Once an account has been created you will be sent a password and user guide to enable you to use the system.

By Email: To the following email address - seafarers@gov.im

By Post: To the following address –

STCW Endorsement Applications
Isle of Man Ship Registry
St Georges Court
Upper Church Street
Douglas
Isle of Man
British Isles IM1 1EX

Further information on the endorsement application process is available on the Ship Registry's website.

Self Print Endorsements

Once the endorsement has been processed, it is now printed on plain white paper by the Company who submitted the application. This change is designed so our clients can save money by not having to pay courier fees, and to allow original endorsements to be onboard yachts more quickly. This also enables us to meet our environmental obligations as an ISO 14001 accredited organisation.

We will confirm with each individual company that they can produce documents to the required standard before they will be permitted to print the documents.

Form of Endorsement

In order to facilitate the above changes, it has been necessary to make some changes to the form of our Endorsement documents, the most significant change is that these are now printed on plain white paper and single sided. A sample of the new form of Endorsement can be found in Appendix 2 to [MSN 051](#).

All 'old' A5 format endorsements issued before September 2017 will continue to remain valid until the date of expiry stated on the individual endorsement. It will therefore be possible for an existing endorsement to remain valid until September 2022 (subject to the expiry date stated on the endorsement).

Further information on Endorsement Applications can be found in [MSN 051](#).

9. Safe manning document

The IOM requires all commercial yachts to be issued with a minimum safe manning document.

This document stipulates the minimum crew provision for a given area of operation appropriate to the size and power of the yacht (refer to Tables 1 & 2). If the vessel's operators would like to apply for an alternative manning proposal, they should contact the Ship Registry with the proposal. If approval is given, the appropriate minimum safe manning document will be issued.

Pleasure vessels may request the issue of a Safe Manning Certificate for which a fee will be charged. The vessel's owner may find such a certificate useful in determining the minimum required crew and judging associated risks regarding the operational range of the yacht. Please refer to [MSN 033](#) for the minimum manning requirements for pleasure vessels.

10. Dispensations

The Ship Registry may issue a dispensation permitting a specified seafarer to serve on a yacht for a specified period generally not exceeding 6 months. This will only be issued under the circumstances stated in Article VIII of the STCW Convention. Requests for the issue of dispensations must be made to marine.survey@gov.im

11. Manning during lay-up

Every commercial vessel is required to be manned, as a minimum, in accordance with the requirements of its flag Administration at all times unless the vessel is 'laid up' and is therefore not operational.

Manning in accordance with the vessel's Minimum Safe Manning document need not apply to vessels which are laid up if this Administration has been informed by the vessel's managers/Master and provided we have acknowledged the notification (for the benefit of PSC inspectors).



When a vessel changes between 'operational' and 'laid up', a note must be made in the official log book.

At all times, it remains the responsibility of the vessel's Master (and therefore ultimately the responsibility of the owner) to satisfy him/herself that the vessel is manned as necessary. If any incident occurs on board (for example a fire/pollution), the investigating authorities will seek to determine the vessel's manning level at the time of the incident. In the event manning is found not to have been in accordance with guidance issued by the vessel's flag Administration, the owner may be placed at risk of prosecution.

The attention of the Master (and owner) is also drawn to **the Regulations of the local port authority** where the vessel is moored or laid up. There will likely be a requirement for a 24hr contact facility to be maintained such that a responsible member of the crew is available to attend the vessel at short notice in the event of a fire or pollution incident on board or nearby.

Required minimum manning when a vessel is laid up cannot be defined exactly as requirements differ depending upon the location of lay-up. The following are factors:

- Is the vessel at anchor/buoys/shore anchors?
- Is the anchorage in port limits/out of port limits and what is the distance from services and assistance?
- Is the anchorage affected by strong currents or weather fronts?
- What is the notice period for the main propulsion plant?
- If the vessel is berthed alongside, is the berth tidal? Is it secure?

A vessel at anchor must maintain an anchor watch, no matter what notice the engine is on. Provision may be a combination of navigating watchkeeping officers and suitably trained yacht ratings at the discretion of the Master.

12. GMDSS Radio Operators

Every person in charge of or performing radio duties on a yacht required to comply with the GMDSS requirements (commercial yacht of $\geq 300\text{GT}$) shall hold a GMDSS operator's certificate issued in accordance with STCW Reg. IV/2.1.

13. RYA Commercial Endorsements

Seafarers holding RYA certificates of competency must ensure that their certificate has a commercial endorsement in order to be valid for an Isle of Man commercial yacht.

Further guidance

[MSN 051](#) – Endorsement Applications

[MSN 052](#) – Minimum Safe Manning

11. MINI-ISM

All commercial yachts under 500GT must maintain a mini-ISM system. As the name implies, this is a simplified version of a merchant ship-type ISM system which manages and records the safety management of the yacht. It is designed to enhance safety for, and mitigate risks to, all persons on board. The requirement for the provision of such a system does not imply a requirement for the vessel to be associated with a nominated 'Designated Person Ashore' or indeed any shore-based management organisation, provided the duties of the vessel's owner (which may in most cases be delegated to the Master) as specified in the Code are satisfactorily carried out.

Annex 2 of the Large Commercial Yacht Code provides essential requirements and guidelines as a framework for the development of a mini-ISM system. The following should be noted when developing such a system:

- It must be simple
- It can be developed by the yacht's senior officers
- It must be sufficiently yacht-specific
- While the system is not subject to a formal approval, the attending surveyor will wish to confirm that the system satisfies the general requirements of Annex 2, is operating satisfactorily, and is understood by all crew members as necessary
- It must be reviewed by the manager/owner at least once every three years

It bears reiterating that the owner is responsible for ensuring that a copy of the vessel's current list of crew is maintained in a readily accessible place. Please note that there is no longer a requirement for this be kept in the Isle of Man.

Further guidance

LY1, [LY2](#) or [LY3](#) (as applicable to yacht) – Large commercial yacht code (Annex 2).

12. OPERATION OF THE SAFETY MANAGEMENT AND SECURITY SYSTEMS DURING LAY UP PERIODS (YACHTS 500GT AND OVER)

Yacht lay-ups may be considered equivalent to an extended dry dock carried out on a cargo ship during which the following may be expected:

- Electrical power supply to the vessel's emergency and critical systems is disrupted meaning routine tests and maintenance cannot be completed by the scheduled dates
- The vessel's crew may not be complete and may not necessarily be accommodated on board
- Routine life-saving drills and fire-fighting exercises may be suspended;
- It may not be possible to complete safety committee meetings within the regulated timetable of a maximum of six weekly intervals
- Changes to arrangements and provision of LSA and FFA may mean inspection routines are disrupted;
- Security procedures, including gangway watch and locking of restricted areas may be disrupted

A consequence of the foregoing on board a yacht which operates a safety management system (SMS) in accordance with the IMO's ISM Code, and maintains security procedures in accordance with the ISPS Code, is that safety and security-related procedures and scheduled maintenance may not be completed and logged as necessary for an extended period.

When a yacht's SMS is suspended in entirety for a period, the following requirements for reactivating the SMS should be followed in accordance with MSC-MEPC.7/Circ.9:

- 1 After the interruption of the SMS on board the yacht, the Company should review the SMS.
- 2 The Company should notify the Ship Registry and port State or coastal State (if applicable) about the reactivation of the yacht. This should include information about the time needed for reactivation, any change of ownership or change of Company and the next intended destination after reactivation.
- 3 If the interruption period of the SMS is more than **3 months but less than 6 months**, additional verification audits (ISM/ISPS/MLC) must be completed by a surveyor from the Ship Registry. Upon satisfactory completion of the additional verification, the existing Safety Management Certificate will be endorsed.
- 4 If the interruption period of the SMS is **6 months or more** then interim IMS/ISPS/MLC audits will be required to be completed by a surveyor from this office, to be followed by initial audits within six months and the commencement of a new 5 year cycle of ISM certification.

Partial SMS suspension

During a partial lay-up period of between 3 and 12 months, this Administration considers that no additional ISM/ISPS verification audits are required to be completed on board commercial yachts of $\geq 500\text{GT}$ on resumption of cruising activity provided the vessel's SMS and SSP have continued *at a reasonable minimum level of operation during that period*.

The following essential activities are expected to be maintained throughout any lay-up period as applicable depending upon whether the vessel is berthed or dry and dependent upon whether systems are under repair:



- Weekly visual inspections of LSA and FFA to ensure availability and basic function
- Weekly testing of all required internal communication equipment
- Weekly testing of GMDSS radio equipment relevant to A1 operation
- Weekly testing of all fire pumps
- Monthly testing of the emergency source of power
- Routine scheduled maintenance, inspection and testing of emergency systems including:
 - Fire detection and alarm system
 - Fixed fire extinguishing system(s)
 - Emergency shutdown operations including operation of fire flaps, remote closure of fuel valves and stopping of ventilation systems (galley/engine room)
 - Portable fire extinguishers
 - Bilge detection and alarms
 - Availability of escape routes
 - Security equipment
- Records of inspections and tests would be expected to be completed as necessary; throughout this period
- Records of hours of rest for remaining crew would be expected to be maintained, at least on a weekly basis
- Maintenance of a degree of security of restricted areas alongside regular inspections of all internal spaces on the vessel
- Correspondence to be maintained with shore-based competent authority concerning potential security concerns in the vicinity

Prior to recommencing cruising operations, the following actions should be completed as a

minimum:

- A thorough inspection and search of all accessible spaces on the vessel, for both safety and security reasons
- Inspection and test of all life-saving appliances including rescue boat crane, rescue boat and any equipment associated with liferaft launching
- Testing of GMDSS radio equipment relevant to the vessel's certified area of operation
- The completion of drills sufficient to ensure that all crew are properly re-familiarised with the vessel's emergency systems, equipment and procedures, including those related to security
- Testing of the vessel's SSAS
- Confirmation of the function of the LRIT system

Further guidance

None.

13. CONTINUOUS SYNOPSIS RECORD

The Master's responsibilities and duties in maintaining the CSR file

The International Ship and Port Facility Security Code (ISPS) was introduced to establish an international security framework to detect and deter acts which threaten maritime security. It applies to yachts over 500gt. A core part of related certification which must be carried on board is the yacht's Continuous Synopsis Record (CSR) file. This is a record of aspects of the yacht's history including details of the yacht's owner, manager, Classification Society and flag Administration. The Master is responsible for maintaining the ship's CSR file.

Whenever a change occurs to any of the items listed on the CSR, a new CSR must be requested from this administration. It is essential that all original CSRs issued to a yacht be retained on board so that changes can be tracked. If a yacht is sold, all the CSRs **MUST** stay with the ship.

On joining a yacht, it is recommended that the Master verify the yacht's CSR file is up to date, noting that CSRs and their history are a Port State Control officer's favourite.

Amendments to the CSR

If a yacht's current CSR requires amendment, the Master is responsible for ensuring its reissue. The Master initiates this process using the [CSR Form 2](#) which can be downloaded from our website. Changes required to be made to the existing document are annotated on the form which is then signed and sent to this administration. Please note that this administration will **ONLY** accept amendments to the CSR on the appropriate Form 2. Sections which do not require amendment should be marked 'N/C' for clarity. After review, we will update our database and issue a new CSR Form 1 and will forward to the ship via managers' offices.

It should be noted that entries in CSR lines 12, 13 and 14 need only be amended when the relevant certificate's issuing body changes. Annotation of the SMC, ISSC or company DOC for annual or intermediate audit does not necessitate the issue of a new CSR.

On receipt of a revised and updated CSR

The Master should check all details are correct and that the document number is indeed the next consecutive number. The Master must then sign where indicated on the reverse of the document to acknowledge receipt and must update the [Index of Amendments \(CSR Form 3\)](#).

Loss of, or damage to, any document in the ship's CSR file

If documents within a yacht's CSR file are lost or damaged, it is essential they be replaced as quickly as possible. Please contact this administration to resolve such issues.

Further guidance

[MSN 029](#) - IMO Unique Company and Registered Owner ID Number & Changes to the CSR

14. ON BOARD COMPLAINTS PROCEDURE

Our approach

The [Isle of Man Ship Registry's Quality Policy](#) affirms our commitment to addressing seafarers' complaints. Complaints will always be passed to a Principal Surveyor who will decide on the action to be taken and will allocate the necessary resources to investigate the complaint. Complaints are always treated confidentially to avoid any additional problems for the seafarer concerned. Complaints are required to be sent to the Ship Registry in writing by letter or email.

The yacht's on board complaints procedure

All yachts must have an on board procedure for the fair and effective handling of seafarers' complaints alleging breaches of any MLC regulation. This mechanism should be used in the first instance of any grievance. In general grievance cases, seafarers should use the standard Company's Complaint procedure which should be available on board at all times. The on board complaint procedures shall include the right of the seafarer to be accompanied or represented during the complaints procedure, as well as safeguards against the possibility of victimization of seafarers for filing complaints.

All seafarers must be provided with a copy of this procedure in their employment agreement, which must include contact information of the Isle of Man Ship Registry in the event that the grievance cannot be resolved using this procedure.

In the first instance, complaints should be addressed to the head of the seafarers' department or to their superior officer. Complaints regarding health and safety matters should also be reported to the safety officer. If the complaint cannot be resolved by either the head of department or the superior officer to the satisfaction of the seafarer then the seafarer may refer the matter to the Master who should personally handle the complaint. If a complaint cannot be resolved on board, the matter should be referred ashore to the shipowner (as defined under MLC regulations) who should be given an appropriate time limit for resolving the matter.

In all cases seafarers should have the right to lodge complaints directly with the Master and/or the shipowner if felt appropriate, however this should only be done when necessary and complaints should be dealt with and resolved at the lowest level possible.

If none of these procedures are effective in resolving the complaint, the Master or any seafarer may take the matter to the Isle of Man Ship Registry. This may be done by letter or by email. The preferred means of receiving complaint is by e-mail to marine.mlc@gov.im or alternatively the seafarer can write by post or fax to:

Principal Surveyor
Isle of Man Ship Registry
St Georges Court
Upper Church Street
Douglas.
Isle of Man
IM1 1EX
British Isles

All such complaints will be treated by the Ship Registry in absolute confidence and will be given serious consideration. If considered appropriate, a surveyor will visit the vessel in order to investigate the complaint as quickly as possible. However, it is essential that the person making any complaint is identified to the Ship Registry. We will not reveal the source of the complaint when investigating but we are not able to process anonymous complaints.

Seafarers also have the right to lodge a complaint with any Port State Authority, however we would urge seafarers to contact the Ship Registry before contacting a Port State Authority.

Further Reading

[MLN 5.1.5](#) – On board Compliant Procedures

15. LIFTING APPLIANCES AND LIFTING GEAR

LSA lifting appliances

Lifting appliances used in association with any life-saving appliance (rescue tender/boat or davit-launched liferaft) are subject to testing in accordance with the Large Commercial Yacht Code, section 13, specifically with respect to sections 13.2.3.1 & 2 and to the boxed text within which reference is made to meeting the basic provisions of SOLAS. Such testing includes installation testing using load factors of up to 2.2xSWL along with five-yearly dynamic proof load testing at 1.1xSWL. [MSN 062](#) refers and provides clear guidance concerning the testing of launching appliances for life-saving appliances.

When a yacht's lifting appliance is used in association with both LSA and non-LSA loads, it should be noted that testing requirements associated with both sets of requirements are applicable. A crane used for launching a rescue boat and for handling oil drums, jet-skis and passenger tenders, for example, may need:

- testing dynamically at 1.1xSWL at five-yearly intervals
- non-dynamic proof load testing, over the full range of movement at five-yearly intervals
- annual thorough examination by a competent person



Relevant test and inspection records should be maintained on board attesting to the completion of these tasks.

Non-LSA lifting appliances and lifting gear

While no reference is made in the Large Commercial Yacht Code to the need for inspection and testing of lifting appliances and lifting gear which are not used in association with the launching and recovery of life-saving appliances, the Isle of Man's Hatches, Holds and Lifting Plant Regulations apply all the same.

There are many different forms of lifting appliance on board a yacht such as stores cranes, electrical hoists, chain blocks, equipment for lifting jet-skis or power boats.

Please note the Isle of Man requirements for the installation and testing of rail-and-trolley systems used by personnel undertaking work over the side are clarified in [MSN 054](#) - the Isle of Man's National Annex to LY3.

There are also various kinds of lifting gear used on board which include any gear to which a load can be attached such as hooks, slings, shackles and ropes.

Isle of Man legislation requires that all lifting appliances and lifting gear be:

- of good design and of sound construction and material
- of adequate strength for the purpose
- free from defect
- properly installed or assembled
- properly maintained

Proof load testing

Lifting appliances and lifting gear shall not be used without first being suitably proof load tested by a competent person after:

- manufacture or installation
- any repair or modification which is likely to alter the safe working load or affect the strength or stability of the equipment

The competent person carrying out a proof load test should be sufficiently independent and impartial to ensure that objective decisions can be made. The competent person can be:

- a surveyor appointed by the IoMSR
- a surveyor appointed by the vessel's Classification Society
- a specialist shore-based organisation

Proof load testing of lifting appliances (including cranes, davits, hoists and chain blocks):

Appliances are required to be proof load tested following installation on board and prior to use. In addition, all lifting appliances shall be subject to repeat proof load testing at intervals of no more than 5 years.

5 yearly testing shall be done with a test load which shall exceed the safe working load (SWL) as follows:

<u>SWL</u>	<u>Test Load</u>
Up to 20 tonnes	25 per cent in excess
20 to 50 tonnes	5 tonnes in excess
Over 50 tonnes	10 per cent in excess

Suitable precautions must be taken before commencement of any test to ensure the following:

- the safety of personnel
- the adequacy of supporting structures



- the ability to maintain control of the appliance
- the stability of the vessel during the test

The competent person shall determine the test procedure. Testing should be carried out in accordance with the manufacturer's instructions and should satisfy a recognised lifting appliance code, for example:

- a national or international standard
- the lifting appliance regulations of a Classification Society

Testing must include proof loading of the appliance and attached gear concerned. In the case of re-testing after repairs or modifications, testing may in some cases be effected by means of a static test using a load cell. In all cases, the test must be to the satisfaction of the competent person. On conclusion of the test, a thorough examination of the equipment shall be completed.

Proof load testing of lifting gear (shackles, hooks, slings and rope):

Gear is tested by the manufacturer in accordance with the applicable national standard and all items should be furnished with a manufacturer's certificate attesting to the completion of such tests. Gear should be identified (stamped/marked) such that the relevant test certificate can be traced. Repeated proof load testing at five yearly intervals is not required.

Thorough examination

Lifting appliances and lifting gear are also required to be thoroughly examined at intervals of no more than 12 months. [MSN 062](#) permits this examination to be carried out by a competent person which may be Master, Chief Engineer, Chief Officer or Second Engineer if they are sufficient qualified with skills, practical experience and knowledge of the lifting appliance.

Records

On completion of any thorough examination or proof load test, an entry shall be made in either the vessel's lifting appliances' log book, the chain register or elsewhere within the vessel's safety management system.

On completion of any proof load test, a signed statement attesting to this, issued by the responsible competent person, shall be retained on board.

Further Guidance

[MSN 062](#) - Authorised service providers for survival craft launching appliances and on-load release gear

[MSN 054](#) - Isle of Man LY3 National Annex

16. MARPOL CONVENTION

The purpose of this section is to provide clarity on the provisions of MARPOL which apply to commercial yachts.

Annex I – Prevention of Pollution by Oil

MARPOL Annex I applies to all yachts, however only those over 400GT are required to hold an International Oil Pollution Prevention Certificate and Record of Equipment, Form A. These vessels are also required to use a type approved oily water separator and oil content meter and must hold type approval certificates on board.

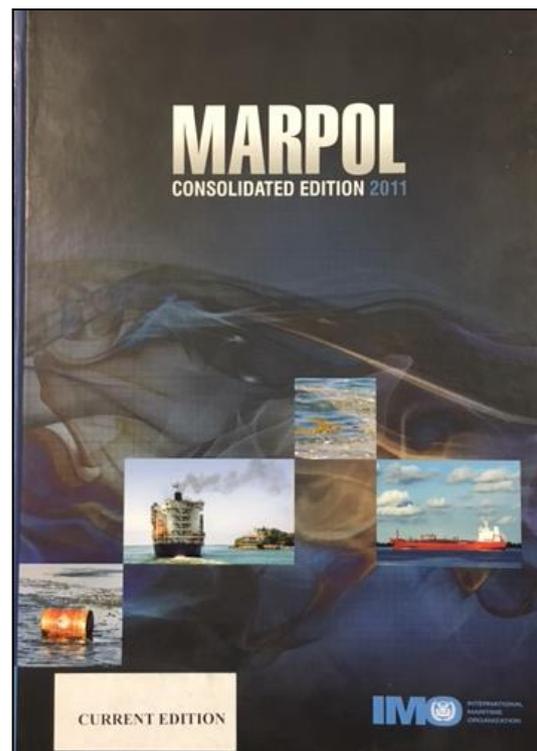
Yachts over 400GT are also required to carry a yacht specific Ship Oil Pollution Emergency Plan (SOPEP) specifying the yacht's procedures in the event of an oil spill. Manx Regulations require an Oil Record Book to be kept on all yachts over 80GT.

Annex II & III

Do not apply to yachts.

Annex IV – Prevention of Pollution by Sewage

MARPOL Annex IV applies to yachts which are 400GT and above, or yachts less than 400GT that are certified to carry more than 15 persons. The number of persons shown on your Cargo Ship Safety Certificate should be used to determine the number of persons that you are certified to carry.



Yachts to which the convention applies are required to carry an International Sewage Pollution Prevention Certificate and to operate a type approved Sewage Treatment System and should hold the type approval certificate on board.

Annex V – Prevention of Pollution by Garbage

MARPOL Annex V applies to all yachts but there is no certificate issued to demonstrate compliance.

A garbage management plan is required for yachts that are either 100GT and over or those certified to carry 15 or more persons. A garbage record book is required for yachts that are either 400GT and over or certified to carry more than 15 persons.

Annex VI – Prevention of Air Pollution

MARPOL Annex VI generally applies to all yachts, except for certain sections of the Annex where exclusions to each regulation are shown. Yachts under 400GT are exempt from a large portion of the requirements. Yachts over 400GT are required to be surveyed and carry the following documents:

- An International Air Pollution Prevention Certificate (IAPP)
- An International Energy Efficiency Certificate
- An Ozone Depleting Substance Record Book
- 3 years of Bunker Delivery Notes
- A Ship Energy Efficiency Management Plan (SEEMP)

An International Engine Air Pollution Certificate is required for each engine of 130kW or above and installed after 1st January 2000.

Further Guidance

[MSN 035](#) - MARPOL Annex VI - NOx Technical Code 2008

[MSN 036](#) - MARPOL Annex I and Changes to the Oil Record Book Parts I and II

[MSN 038](#) - MARPOL Annex VI

[MSN 041](#) - MARPOL Annex IV

[MSN 043](#) - Revised MARPOL Annex V

[MSN 049](#) - MARPOL Annex VI – Local Suppliers of Fuel Oils

17. PORT STATE CONTROL

The Ship Registry has a very high reputation with respect to port State control and this is due to the good condition of Manx ships and yachts when inspected.

The Isle of Man Ship Registry takes any detention of an Isle of Man ship or yacht very seriously. Every detention damages our reputation and increases the number of inspections of Isle of Man vessels. In some areas repeated detentions can lead to a vessel being banned from a PSC region.

When to expect an inspection

This will depend upon the relevant MOU inspection region in which your yacht is trading, the PSC inspection procedures, and the age of the yacht.



In both the Paris & Tokyo MoU Regions, there are inspection regimes in place that are based upon the risk profile not just of the individual vessel itself, but the rest of a fleet and therefore the Company performance. Each yacht in the information system will be attributed a Ship Risk Profile (SRP). This SRP will determine the yacht's priority for inspection, the interval between its inspections and the scope of the inspection. Yachts are

assigned either a high, standard or low risk. This is based on generic and historic parameters.

However, in other MoU regions, yachts will be inspected routinely once every six months within a particular inspection region, providing there were no deficiencies recorded at the last inspection, or there are no outstanding deficiencies from a previous inspection within any other region. If your yacht moves from one PSC inspection region to a port in another region then the yacht expect to be re-inspected under their relevant PSC inspection procedures.

Periodic inspections are carried out at intervals determined by the SRP. Overriding or unexpected factors might trigger an inspection in between periodic inspections. This type of inspection is referred to as an 'additional inspection'.

Yachts become due for periodic inspection in the following time windows:

- For HRS (high risk) – 5-6 months after the last inspection in the Paris MoU region
- For SRS (standard risk) – 10-12 months after the last inspection in the Paris MoU region
- For LRS (low risk) – 24-36 months after the last inspection in the Paris MoU region

Periodic inspections and additional inspections count equally. Therefore the time span for the next periodic inspection re-starts after an additional inspection.

The selection scheme is divided into two priorities:

- Priority I: yachts must be inspected because either the time window has closed or there is an overriding factor.
- Priority II: yachts may be inspected because they are within the time window or the port State considers an unexpected factor warrants an inspection.

The priority and the level of selection will be shown for each yacht in the information system.

Unexpected factors could indicate a serious threat to the safety of the yacht and the crew or to the environment but the need to undertake an additional inspection is for the professional judgment of the inspection authority.

Paris MoU – General reporting obligations

A yacht has to report 24 hours (24 ETA) before arriving at a port or anchorage of the Paris MoU region or before leaving the previous port or anchorage if the voyage is expected to take less than 24 hours. Thus, this pre-arrival notification has to be reported to all ports in the Paris MoU region the yacht calls. The 72 hours reporting obligation (72 ETA) is only required when the yacht is due for an expanded inspection.

Reporting obligations for yachts due an expanded inspection

Yachts due for an expanded inspection have to report 72 hours (72 ETA) before arriving at a port or anchorage of the Paris MoU region or before leaving the previous port or anchorage if the voyage is expected to take less than 72 hours the following information to the port authority:

- yacht identification (name, flag, call sign IMO or MMSI number)
- port of destination
- estimated time of arrival (ETA)
- estimated time of departure (ETD)
- planned duration of the call
- planned operations at the port or anchorage of destination
- planned statutory survey inspections and substantial maintenance and repair work to be carried out whilst in the port of destination
- date of last expanded inspection in the Paris MoU region.



Other MoU regions now have available websites which provide guidance on various aspects of PSC inspections and criteria in their geographical areas. Some of these are as follows;

www.tokyo-mou.org

www.iomou.org

www.bsmou.org

www.riyadh-mou.org

www.medmouic.org

www.parismou.org

www.homeport.uscg.mil

There are a number of actions that you can take to avoid Port State Control detentions. Advice on these matters is contained in the various [Manx Shipping Notices](#) and within [Port State Control Information Notices](#), which are promulgated from time to time. In general you must ensure that;

- all statutory and secondary certificates and documents are in order
- all surveys are completed within specified dates
- all crew certificates, endorsements and medical certificates applicable to the STCW Convention are correct
- all fire-fighting appliances and installations are ready for immediate use, including all fire-fighting equipment, fire doors, ventilation fire dampers and fire flaps, main and emergency fire pumps
- that all life-saving appliances are ready for immediate use, weekly / monthly inspections recorded, lifeboats and MOB rescue boats ready for operation, other life-saving appliances are correctly stowed and in good order
- all crew members are properly familiarised with their emergency and security duties, are conversant with their respective duties and responsibilities
- the oily water separator and alarm unit is 100% operational.
- areas within the yacht are clean and provide a safe working environment



These are the minimum steps to avoid a detention or an inspection during which many deficiencies could be recorded. They should all be covered as part of a properly working ISM system and faults in any of these areas suggests that your ISM system may not be working properly.

When an Isle of Man yacht is detained it is essential that the Isle of Man Ship Registry is informed immediately with all the facts

There are two reasons for this:

1. the Ship Registry will often send a surveyor to investigate the reasons for a detention.
2. the Ship Registry will, where applicable, challenge the Port State Control Authority that has detained the yacht when a detention is unjustified. It is not uncommon for yachts to be detained on inadequate grounds and if the Ship Registry has the facts in time it is often possible to have a detention lifted and removed from the yacht's record.

Masters are also requested to forward to the Ship Registry a copy of the PSC report for our records.

Further guidance

The Ship Registry publishes port State control notices to advise clients of any updates or changes to port State control procedures. These can be accessed on the Ship Registry website by accessing the 'Notices & Legislation' section and then [PSC Notices](#).

18. WORKING WITH THE SHIP REGISTRY

The Isle of Man Ship Registry aims to provide the best possible service at all times. We welcome feedback from yacht owners and from yacht crews telling us when we are getting things right and, just as importantly, letting us know when we are not. This enables us to focus on where we need to learn from our mistakes and improve. We record and monitor all complaints and carry out regular reviews of our customer services.

Step 1

If you are not satisfied with the service you receive from this office or from your Classification Society, please get in touch with the person or section that you have been dealing with. They will be keen to put the matter right in the first instance when possible. All letters emanating from this office include the name and telephone number of the sender and usually a reference number. Email is the preferred medium of communication, hence please address emails to marine.survey@gov.im; this is an address which is always monitored during office hours. We are confident that most concerns will be addressed satisfactorily at this first step. However, if you have already explored this avenue as far as you can, then please proceed to Step 2.

Step 2

Please address a letter (address on back cover) or an email to the Principal Surveyor at the following address: marine.survey@gov.im

Step 3

If, following Step 2 and you remain dissatisfied, please write/email the same address, including full details of previous correspondence, the letter/email should be marked for the attention of the Director of the Isle of Man Ship Registry. The Director will make sure that your complaint is thoroughly investigated and a response generated.

At every step, we will try to respond to your correspondence within a reasonable time.



19. FREQUENTLY ASKED QUESTIONS

19.1 How do I arrange an ISM audit?

When the vessel is due an ISM audit, the Isle of Man Ship Registry should be contacted giving as much advance notice as possible. The surveyor/auditor will visit the vessel at a time and place agreed with the yacht's operator or Master. Typically the surveyor will be on board the vessel for a ten hour day during which time he/she will perform the SMC audit and carry out a general inspection.

19.2 What about ISPS audits?

A security audit is carried out at the same time as the ISM audit. This enables these two statutory certificates to be harmonised, reducing the number of visits the yacht requires over a five year period.

19.3 What about MLC inspections?

Please refer to the extensive information provided in Section 2 of this handbook.

19.4 How often should a Master's Review be completed for ISM?

Within the vessel's Safety Management System, the Company should stipulate the required frequency for such reviews. Generally, the Master's review should take place at a maximum interval of 12 months. To avoid the whole system being reviewed in one go, a suggested approach is for the Master to review one area of the SMS every month ensuring that over the year the whole system is thoroughly reviewed.

19.5 Can you give me a list of critical equipment (further to ISM Code section 10.3)?

Critical equipment includes any equipment which, if it fails, may result in a hazardous situation. Examples include (but are not limited to) steering gear, main engine(s), navigation equipment, mooring systems, GMDSS radio equipment and the emergency bilge system.

19.6 What are the requirements for undertaking drills on board?

Each crew member must participate in at least one abandon ship drill and one fire drill monthly. Such drills shall take place within 24 hours of the yacht leaving the port if more than 25% of the crew have not participated in an abandon ship or fire drill on board that particular yacht in the previous month (for example, if they have just joined). For guidance on what should be included in a drill, reference may be made to SOLAS Chapter III, Regulation 19.

Fire drills are typically expected to include such scenarios as 'engine room fire', 'engine room fire with a missing person', 'accommodation fire', 'galley fire', and 'fire on an adjacent vessel'. Periodically, drills should include the recovery of an unconscious crew member or guest from an internal space.

Man-overboard drills should involve realistic scenarios as far as possible and should assist with training crew members to undertake recovery of a (heavy) floating body from the water.

19.7 Is every crew member on board required to be issued with a medical certificate?

Yes. All seafarers on board the yacht must have a valid medical certificate confirming the holder's fitness for seagoing service. The purpose is to ensure that only medically fit persons are employed on board the yacht. This is an international regulation and covered under the ISM Code Section 6.2 as well as within MLC 2006.

We strongly urge all persons to ensure that they keep their medical certificates up to date and not wait until the last minute as this can cause undue pressures on a doctor, especially if that doctor is the only person authorised to perform seafarers' medicals in the area.

On occasion, a medical certificate will expire while a vessel is at sea. While the regulations make allowance for such an eventuality, the Master is obliged to ensure that a further medical take place at the next suitable port before that person can proceed to sea again. Further information is available in [MLN 1.3](#).

19.8 What do I do if there is no local radio surveyor?

All commercial yachts irrespective of size require an annual survey of the GMDSS radio station (LY2 Chapter 16 refers) to be carried out by a Class or flag-approved radio surveyor. This survey must be arranged by the Master or yacht manager. The radio surveyor must leave a report on board confirming that the radio equipment continues to meet the requirements of the Large Commercial Yacht Code applicable to the yacht's area of operation.

Yachts $\geq 300\text{GT}$ are required to be issued with a Cargo Ship Safety Radio certificate. Following the completion of the annual radio technician's survey, the certificate is required to be endorsed by the attending Class surveyor and not by the radio surveyor.

If there is no Class or flag-approved radio surveyor available in the area, please contact us and we will advise further.

19.9 What about the Radio Licence?

The Isle of Man Ship Registry is not responsible for the issue of radio station licenses.

It is the owner's responsibility to obtain a license through the UK's Ofcom.
Online applications can be progressed through:
<http://www.ofcom.org.uk/radiocomms/ifi/licensing/classes/maritime/>

Ofcom can also be contacted through:
e-mail: olcspectrum@ofcom.org.uk
Tel: +44 207 6833131
Website www.ofcom.org.uk

19.10 What about my EPIRB registration?

Once the EPIRB has been programmed, notification should be passed to the Maritime and Coastguard Agency (MCA) in Falmouth:

Tel: +44 1326 2115569
Fax: +44 1326 319264

This notification can also be registered on line at:
<http://www.mcga.gov.uk/c4mca/mcga07-home/emergencyresponse/mcga-searchandrescue/epirb.htm>

19.11 What certificate should a Ship Security Officer hold?

All commercial vessels of 500GT and above must comply with the ISPS Code and as such will need to appoint a Ship Security Officer (SSO). Since 1st July 2009, the SSO has been required to be issued with a certificate in accordance with regulation VI/5 of the STCW Convention and STCW Code Section A-VI/5. Earlier SSOs' certificates missing this reference are no longer valid.

19.12 Who is required to have security training in accordance with STCW Section A-VI/6?

STCW Regulation VI/6 has introduced 3 new levels of security training which is required for seafarers working on commercial yachts of 500GT or more.

All seafarers must have evidence available that they have received security familiarisation training carried out by the Ship Security Officer or an equally qualified person, prior to taking up duties on board.

Evidence shall also be available confirming that all seafarers have completed one of the following courses (depending on their duties on board), or that they meet the requirements of the transitional provisions:

- a) Standard of competence for security awareness training (STCW VI/6 paragraph 1)
- b) Standard of competence for seafarers with designated security duties (STCW VI/6)

- paragraph 4)
c) Ship's security officer certification (STCW VI/5)

The transitional provisions apply to seafarers who have at least 6 months' sea service on an ISPS certificated yacht, during the preceding 3 years before 01/01/2012. Seafarers who fulfil the transitional provisions should have evidence on board which can be a 'certificate for proficiency in security duties by virtue of sea service' or a similar certificate or letter issued by their company or their certificate issuing authority. If this is not available, the seafarer's discharge book can be checked for evidence that the seafarer has the required sea-service. The Master should note however that Port State Control officers may demand more evidence than just a discharge book entry.

Further information is available in [MSN 046](#).

19.13 Maintenance of the vessel and equipment – Any size of yacht!

Any ISM system (and any mini-ISM system) must include procedures detailing requirements for maintenance. Such procedures may be software or paper-based.

The following, non-exhaustive list, includes items which should be included in any safety-related maintenance system. Time scales are suggestions only.

- Fuel tank remote-closing valves – test weekly
- Vent dampers – test weekly
- Fire detectors – test every 3 months. The vessel's engineers may wish to test a sample of detectors on a weekly basis such that all detectors are tested within a three month period. An aerosol smoke spray may be used for smoke detectors. Heat detectors generally function under the blast of a hairdryer;
- Emergency lights – test weekly to confirm all bulbs/LEDs are functional. Test should include running the emergency generator, if one is provided, and a confirmation that all emergency power consumers are functional in the absence of power from the main switchboard;
- Bilge alarms – test monthly
- Main and auxiliary engines' fuel leakage alarms – test monthly
- Emergency fire pump – test weekly
- Emergency operation of steering gear – test every 3 months

Basically, if safety-related equipment is on board, it should be confirmed operable as failure of equipment during a real emergency, or a lack of familiarity of crew members with supplied equipment, can be dangerous as well as potentially tragic. The best way to check that something is working is to test it. Don't wait until the annual surveys by Class or flag. It's your yacht and your responsibility!

19.14 Men and women sharing cabins

The Large Commercial Yacht Code, LY1, 2 or 3, is applicable to most existing yachts. Section 21.9 of LY3 refers to the provision of sleeping accommodation and no reference is made to the segregation of men and women. Code section 21.1.4 makes reference to the application of crew accommodation standards within ILO Conventions. Within ILO 92 and 133, no mention is made of the need to segregate men and women into separate sleeping rooms.

When the requirements of LY3 are applicable to a vessel, the following may be noted:

- Section 21A.10.4 requires vessels below 200GT to provide sleeping accommodation, '... situated or equipped, as practicable, so as to provide appropriate levels of privacy for men and for women'
- Section 21B.8.3.3, (Sleeping Accommodation - Equivalent arrangements to the Maritime Labour Convention 2006 for vessels of 200GT and over and less than 500GT) requires that separate sleeping rooms be provided for men and for women

In all cases, and irrespective of the foregoing, the Isle of Man Ship Registry considers that a man and a woman who are not in a relationship should not be placed in a position where they are required to share a cabin. Where two seafarers who are in a relationship elect to share a cabin, this is of course no problem. Agreement in writing to such an arrangement is not required - confirmation of seafarers' agreement to sharing is the responsibility of the Master.

It should be additionally advised to the Master that Isle of Man-flagged vessels are expected to maintain the highest professional standards on board, whether a vessel be a supertanker or a commercial yacht of 80 gross tons. While mixed gender cabins may still be common practice on board some sail training vessels, the rest of the commercial industry has left such practices behind. Should any seafarer take issue with the provision of sleeping arrangements, and should a complaint be received in this office with respect to encountering such a situation, this office would make representations to the shipowner in accordance with our position as stated above.

Where a male seafarer and a female seafarer do not agree to share a cabin, this should not result in prejudice to the employment prospects of either.

19.15 Medical scales for passengers?

Section 23 of the Large Yacht Code requires that medical stores be carried 'as required by the administration'. The Isle of Man Ship Registry applies Merchant Shipping (Medical stores) Regulations, 2001 and guidance is also provided in [MLN 4.1](#).

Within the requirements, no stipulation is made concerning the application of medical scales

to the carriage of passengers, other than when the number carried exceeds 12 persons (which it never does on Large Commercial Yachts). The provision of medical scales for passengers on board is considered to be a commercial decision taken by the operator after consideration of the length of the voyage and the availability of helicopter transfers to shore-based medical facilities.

In the absence of any clear legislated requirement, it is recommended that medical stores be provided on board which are sufficient for the number of persons the vessel carries; all persons, passengers and crew being regarded as 'crew' with respect to their medical needs.

19.16 Carriage of more than 12 passengers when the vessel is at anchor or berthed

The Large Commercial Yacht Code limits commercial yachts to carrying no more than twelve passengers. Quite often, Masters ask permission from this office for the vessel to hold a party hosted by the passengers during which more than twelve guests will be on board.

Provided the vessel does not sail (i.e. is at anchor near to a port or is tied up alongside), and provided guests on board (in excess of the number the vessel is certified to accommodate while operating commercially) do not stay overnight, there will be no objection from this administration and no exemption certificate need be issued.

When the vessel is at anchor or is tied up alongside, the number of persons permitted to be on board is a matter for the Master's discretion. It is recommended that an appropriate risk assessment be drafted by the Master for discussion and circulation among the vessel's senior officers. It is concluded that any additional guests on board are invited for a private/public function by a single charterer, or by the owner/operator, and are in no sense paying for their invitation.

In drafting the risk assessment, the vessel's Master will wish to consider the following:

- The need to evacuate all persons on board in an emergency - the routes available and/or the life-saving appliances available, tenders etc.
- The number of trained personnel on board who can assist in the evacuation and/or who can operate the life-saving appliances, tenders etc.
- The type of emergency that could occur and the risks involved – for man-overboard, fire, sinking etc.
- The equipment fitted to the yacht – access arrangements/LSA/fire-fighting systems and equipment, PA system etc.
- Stability of the vessel and the maximum loading

On no account should the number of passengers and crew staying on board overnight be more than the number of berths for passengers and crew that are available on board.

19.17 Are there any special accommodation for yachts of 3000GT but less than 5000GT?

Yes, there are substantially equivalent standards which are specified in [MGN 517](#). These were published since it was recognized that strict compliance with the LY3 standards may not create the best sleeping accommodation standards for seafarers on yachts of that size.

19.18 What is the requirement for manning a 'tender to' a commercial yacht?

In all cases, the responsibility for ensuring that a tender is manned by suitably qualified personnel rests with the vessel's Master. As a minimum, the Isle of Man Ship Registry recommends that a tender carrying passengers should be skippered by a person holding a suitable certificate of competency as a powerboat operator together with a certificate of proficiency in survival craft in accordance with STCW Section A-VI/2. The vessel's ISM or mini-ISM system should provide procedures to consider and mitigate risks to passengers travelling on the vessel's tender which should include reference to manning and to the provision of adequate safety equipment together with means of communication with the mother vessel.

Please see [MSN 025](#) for further information on tenders for commercial yachts.

19.19 What are the requirements in respect of ECDIS?

The Large Yacht Code does not mandate commercial yachts to carry ECDIS. However where ECDIS is provided as the primary means of navigation, it must be present in duplicate form.

Where ECDIS is provided as the primary means of navigation, Officers with responsibility for navigation watch keeping should have received appropriate shore based and ship type-specific training and should keep evidence of this on board.

19.20 Am I required to have an emergency towing procedure and what should it entail?

A ship specific emergency towing procedure was added to LY3, but is not required for yachts certified under previous versions of the Large Yacht Code. The procedure should be included within the yacht's Safety Management System.

Guidelines for the preparation of the Emergency Towing Procedure can be found in [MSC.1/Circ.1255](#).



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