Kiribati Ship Registry

MARINE CIRCULAR
10/2025

8 December 2025

FOR : **Ship Owners, Ship Managers, Ship Operators, Ship Masters, Ship Officers, Recognized Organizations, Flag State Inspectors**

SUBJECT : **REQUIREMENTS FOR SHIP-TO-SHIP OPERATIONS TO PREVENT ILLEGAL OPERATIONS BY THE "DARK FLEET" OR "SHADOW FLEET"**

REFERENCES :

(a) IMO Resolution A.1192(33), Urging members states and all relevant stakeholders to promote actions to prevent illegal operations in the maritime sector by the "Dark Fleet" or "Shadow Fleet"

DEFINITIONS :

The following abbreviations stand for:

- "DPA" – Designated Person Ashore
- "GT" – Gross Tonnage
- "IMO" – International Maritime Organization
- "ISM" – The International Safety Management Code
- "MSC" – Maritime Safety Committee
- "MARPOL" – International Convention for the Prevention of Pollution from Ships 1973, as modified by the Protocol of 1978
- "SOLAS" – International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended
- "STS" – Ship-to-ship

The term "Administration" shall mean the Kiribati Ship Registry.

APPLICATION:

All Kiribati-flagged Oil Tankers of 150 GT and above, engaged in the transfer of oil cargo between oil tankers (STS operations) wherever they are located.

PURPOSE :

The circular draws your attention to Resolution A.1192(33), adopted by the 33rd session of the IMO Assembly on 06 December 2023 urging member States to promote actions to prevent illegal maritime operations by the "Dark Fleet" or "Shadow Fleet".

REQUIREMENTS:

1. Shipowners, managers operators and masters of Kiribati-flagged oil tankers are reminded to adhere to safety and pollution prevention requirements in IMO Conventions, especially SOLAS Chapter V Regulations 19 & 19-1 and MAPRPOL Annex I Chapter, and comply with safe shipping standards.

2. MARPOL Annex I Chapter 8 requires any oil tanker involved in STS operations to carry on board an approved STS operations plan. Where the STS operations are planned within the territorial sea, or exclusive economic zone of a MARPOL member State, the oil tanker is required to notify that member State in advance of the planned STS operations.

3. Kiribati-flagged Oil Tankers planning to engage in mid-ocean STS operations are to update the ship's STS operations plan to include a notification, with the following information, to technical@kiribaship.com at least forty-eight (48) hours prior to carrying out the mid-ocean STS operations:

3.1. For the Kiribati-flagged oil tanker:

    3.1.1. Ship Name
    3.1.2. IMO Number
    3.1.3. ISM Manager (DPA)
    3.1.4. Date & Time (UTC) & Geographical location of commencement of planned STS operation
    3.1.5. Type (receive or discharge) & Mode (anchored or underway) of STS operation
    3.1.6. Type of oil & quantity
    3.1.7. Confirmation that an approved STS operations plan is in place

3.2. For the other oil tanker:

    3.2.1. Ship Name
    3.2.2. IMO Number
    3.2.3. Ship's flag
    3.2.4. ISM Manager (DPA)

4. In the event that the STS operation is carried out between two Kiribati-flagged oil tankers, both vessels must notify the STS transfer operation in accordance to subsection 3.1 above.

5. If the estimated time of arrival of an oil tanker at the location or area for the STS transfer operation changes by more than six hours or cancelled, the shipowner, master, or DPA must immediately inform the Administration at technical@kiribaship.com

6. All Kiribati-flagged oil tankers of 150GT and above engaged in STS transfer operations shall ensure that the AIS and LRIT are working properly.

7. Kiribati-flagged oil tankers are prohibited to engage in STS transfer operations with any vessel sanctioned by UN, US, UK, EU and any other sanctioned programs recognized by the Administration.

8. Kiribati-flagged vessels that fail to comply with the above may be subject to deregistration of registration immediately.

Yours sincerely,

Deputy Registrar
Kiribati Ship Registry