



Maritime &
Coastguard
Agency

MARINE GUIDANCE NOTE

MGN 660 (M)

Special Measures to Enhance Maritime Safety for Merchant Ships

Notice to all Owners, Ship Operators and Managers, Charterers, Masters and Officers of Merchant Ships, Shipbuilders, Port Authorities and Classification Societies

This notice should be read with the Merchant Shipping (Special Measures to Enhance Maritime Safety) Regulations 2024 (SI 2024/XXX).

Summary

This notice provides guidance on the Merchant Shipping (Special Measures to Enhance Maritime Safety) Regulations 2024 (“the 2024 Regulations”), specifically on the process of obtaining a ship identification number and marking it on the ship, as well as obtaining Company and Registered Owner identification numbers; these numbers are required in accordance with regulations 3 and 3-1 respectively of Chapter XI-1 of the International Convention for the Safety of Life at Sea, 1974 (SOLAS).

In this document, reference is made to the application process for the issue of the Continuous Synopsis Record (CSR), guidance on which is available from the MCA (MSF 5623A).

1. Introduction/background

1.1 Regulation 3 of SOLAS Chapter XI-1 requires that all passenger ships of 100 GT and upwards and all cargo ships of 300 GT and upwards be permanently marked with an identification number provided by the International Maritime Organization (IMO). This is known as the “IMO number”. The Regulations implement this international requirement in the United Kingdom. IMO Resolution A.1117(30) provides details on how to obtain the IMO number and explains the management of the ship identification number scheme. Regulation 3 of SOLAS Chapter XI-1 further requires the IMO number to be inserted on relevant certificates, which

are the ship's passenger ship safety certificate, short international voyage passenger ship safety certificate, cargo ship safety certificate, cargo ship safety construction certificate, cargo ship safety equipment certificate, cargo ship safety radio certificate, as the case may be. The United Kingdom interpretation is that these obligations lie with the Company, owner and master of the ship; failure to comply is a criminal offence.

1.2 Regulation 3-1 of SOLAS Chapter XI-1 requires the Company and registered owner of a ship to which SOLAS applies to each be provided with an identification number which conforms to IMO Resolution MSC.160(78). Regulation 3-1.4 further requires the Company identification number to be inserted in the ship's Document of Compliance and International Safety Management Certificates, as well as in the certificates issued in accordance with the International Code for the Security of Ships and of Port Facilities (ISPS Code). The United Kingdom interpretation is that these obligations lie with the Company and owner and failure to comply is a criminal offence.

1.3 Regulation 5 of SOLAS Chapter XI-1 requires the Company and registered owner identification number to be inserted on the ship's Continuous Synopsis Record (CSR). All newly issued or amended CSRs must have the identification numbers included.

2. Ship Type to be assigned with IMO Ship Identification Number

2.1 IMO Resolution A.1117(30) states that the Administration should apply the scheme to new and existing ships under its flag engaged in international voyages. An Administration may also assign IMO numbers to ships engaged solely on domestic voyages and to insert the numbers in their certificates.

2.2 The United Kingdom flag administration is the Maritime & Coastguard Agency (MCA). In accordance with the requirements of SOLAS, the MCA requires all passenger ships of 100 gross tonnage and upwards and all cargo ships of 300 gross tonnage and upwards engaged on international voyages to have an IMO number and places the obligation for obtaining this on each of the Company, owner and master (see section 1 above). Additionally, the MCA has decided that the following types of domestic ships must also have IMO numbers (see regulations 4(1) and 7(1) of the 2024 Regulations):

- a) United Kingdom Class A passenger ships
- b) United Kingdom Class B passenger ships which are certified to carry more than 250 passengers
- c) United Kingdom tankers of 300 gt and above engaged on non-international voyages which proceed to sea

3. Marking a ship with the IMO Ship Identification Number

3.1 Regulation 7(4) of the 2024 Regulations requires that the IMO number must be permanently marked on United Kingdom ships constructed of steel or metal:

- a) in a visible place—
 - (i) on the stern of the ship; or

- (ii) on either side of the hull, amidships port and starboard, above the deepest assigned load line; or
 - (iii) on either side of the superstructure, port and starboard; or
 - (iv) on the front of the superstructure; or
 - (v) in the case of passenger ships, on a horizontal surface visible from the air;
and
- b) in an easily accessible place—
- (i) on one of the end transverse bulkheads of the machinery spaces; or
 - (ii) on one of the hatchways; or
 - (iii) in the case of tankers, in the pump-room; or
 - (iv) in the case of ships with ro-ro spaces, on one of the end transverse bulkheads of the ro-ro spaces; **and**
- c) by raising lettering or by cutting it in or centre-punching it or by any other equivalent method accepted by the MCA in writing of marking the ship identification number in order to ensure the permanency of the marking.

3.2 The marking of the identification number must be—

- i) plainly visible;
- ii) clear of any other markings on the hull; and
- iii) painted in a contrasting colour.

3.3 The marking referred to in paragraph 3.1 above must comply with the following requirements:

- (a) in the case of paragraph 3.1(a), the marking must be not less than 200 millimetres in height;
- (b) in the case of paragraph 3.1(b), the marking must be not less than 100 millimetres in height; and
- (c) the width of the marks must be proportionate to the height.

3.4 On United Kingdom ships constructed of material other than steel or metal, the method of marking the identification number on the ship must be approved by the Secretary of State before such marking is undertaken. Approval must be obtained in writing and MCA Survey and Inspection Branch must be contacted for the purposes of obtaining this approval.

3.5 Failure to mark the ship's identification number on a ship in accordance with regulation 7(4) of the 2024 Regulations is a criminal offence by the Company, owner and master of the ship.

4. Who is required to have a Company and Registered Owner Identification Number?

4.1 The IMO Unique Company and Registered Owner Identification Number Scheme was adopted by Resolution MSC.160(78) in 2004 to improve marine safety, security, environmental protection, and fraud prevention. Its purpose is to assign each company and/or registered owner a permanent identifying number.

4.2 In 2005, by adopting proposed new SOLAS regulation XI-1/3-1 (Resolution MSC.194(80), (which entered into force on 1 January 2009), the Company and registered owner identification number scheme became mandatory for Companies and registered owners of ships to which SOLAS applies. It was also suggested that administrations may also wish to require Companies and registered owners engaged solely in domestic trade to have an IMO Company and registered owner identification number and to insert the number in their certificates. As such, in the UK, operators of domestic ships, other than cargo ships under 500 gross tons, are required to have a Company and registered owner identification number (regulation 8 of the 2024 Regulations)

The “Company” is defined as the owner or other person or organisation responsible for operating the ship in accordance with the ISM Code. The registered owner is the person or company stated on the UK Certificate of Registry for the ship.

5. How the numbers can be obtained

5.1 The IMO Unique Company and Registered Owner Identification Number Scheme is managed, in parallel with the IMO Ship Identification Number Scheme (Resolution A.1117(30)), without charge by IHS Markit, Maritime and Trade (IHSM). Once assigned, the number remains unchanged for a Company and/or registered owner. When Companies and/or registered owners merge, as a matter of general policy, IHSM assigns the number of the larger Company and/or registered owner to the new amalgamated entity, while the number of the smaller entity is frozen and not re-used.

5.2 The IHS Markit website can be used to look up or request an IMO ship identification number and/or Company and registered owner number free of charge. Contact details are as follows:-

IHS Markit, Maritime and Trade (IHSM)
(Part of IHS Markit)
Sentinel House
163 Brighton Road
Coulston
Surrey CR5 2YH
United Kingdom
International tel.: (+44) (0)1334 328300
Web: www.imonumbers.ihs.com

E-mail: maritime.owners@ihs.com (for company)

E-mail: ship.imo@ihs.com (for ship)

6. Guidelines for the issuance and maintenance of Continuous Synopsis Record (CSR)

6.1 Regulation 5 of SOLAS Chapter XI-1 requires all passenger ships and cargo ships of 500 gross tonnage and above engaged on international voyages to have on board a Continuous Synopsis Record (CSR). Regulation 9 of the 2024 Regulations incorporated this international requirement into UK law.

6.2 The CSR is a form of logbook that stays with the ship for its whole life, and records all changes of owner, flag, name, Class, ISM etc. The ship must keep its copy of the whole CSR on board even when it transfers to another flag state, is sold to another owner, is taken over by another bareboat charter, or where another company assumes the responsibility of the ship operation.

6.3 A CSR must be maintained for the following UK ships:

- passenger ships on international voyages
- cargo ships of 500 gt and above on international voyages

6.4 Further guidance on the CSR is available in MSF 5623A, which can be accessed at <https://www.gov.uk/>.

More information

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