

CIRCULAR	Circular No. 018 (Amended)
SUBJECT	Revised Detention Penalty Framework and Company-Wide Corrective Measures
FROM	Office of the Maritime Administrator, Vanuatu International Shipping Registry
TO	All shipowners, managers, operators, masters, Special Agents, Recognized Organizations and Flag State Inspectors
AMENDMENT DATE	20 August 2026
EFFECTIVE DATE	Upon publication
STATUS	Version 2.0 - Supersedes the prior version of Circular No. 018

Authority and legal status. This Circular is issued by the Maritime Administrator under the functions and powers conferred by the Maritime Act [CAP 131], as amended by the Maritime (Amendment) Act No. 21 of 2025, including section 10C where applicable, and any additional written authority lawfully applicable to the subject. It shall be read with applicable mandatory IMO instruments and controlled VISR policies. It does not convert a direct statutory power into a delegated power, transfer a function assigned by law to another State entity, or amend any valid appointment, concession or other governing instrument.

Related controlled policies: VISR-QMS-POL-PSC-008 - International Fleet PSC Performance, Detention and Corrective Action Policy; VISR-QMS-POL-CI-002 - IMSAS Compliance, Internal Audit, Corrective Action and Continual Improvement Policy; VISR-QMS-POL-REC-005 - Document and Records Control, Retention and IMSAS Evidence Management Policy; VISR-QMS-POL-REP-006 - Statutory Reporting, Performance Review, Audit and Government Access Policy.

1. Immediate detention obligations

- Notify VISR immediately and provide the full PSC report, detention notice, photographs and contact details.
- Arrange RO and FSI attendance when directed and correct deficiencies to the satisfaction of the port State and Registry.
- Submit an initial causal assessment within three business days and a complete root-cause and corrective-action report within the period set by VISR.
- Do not attribute blame to an RO, FSI, master or crew member without evidence. Company and management-system causes must be examined.

2. Base administrative penalty

A detention may attract a base administrative penalty of USD 7,000 where the Maritime Administrator holds lawful penalty authority and after written notice and decision. The penalty is separate from inspection, audit, travel, legal, repair and port-State costs. It is not automatic where the legal criteria are not met or the event is established to be outside the company's reasonable control.

3. Aggravating and mitigating factors

- Aggravating factors include repeated detention, concealment, operation after warning, falsified records, multiple major deficiencies, failure to report, overdue corrective action and company-wide recurrence.
- Mitigating factors include prompt self-reporting, isolated unforeseeable failure, effective emergency action, full cooperation, strong prior performance and verified permanent correction.
- The written decision will explain the amount, authority, evidence and payment deadline. No double penalty will be imposed for the same conduct under multiple circulars without clear legal basis.

4. Company-wide measures

Where the detention reveals systemic ISM or management failure, VISR may require an additional DOC or SMC audit, review of sister vessels, targeted FSIs, management interview, competence review or operational restriction. Measures will be risk-based and closed only on objective evidence.

Compliance records and communications

All applications, approvals, notices, reports, evidence, decisions, acknowledgements and corrective-action records required by this Circular must be transmitted through an official VISR channel and retained in the controlled Registry file in accordance with the VISR records policy. Communications from unverified domains or persons without written authority must not be relied upon.

Official contact: technical@register-vu.com. Urgent safety, casualty, sanctions or fraud matters must also be copied to info@register-vu.com and reported without delay.

Enforcement, reasons and reconsideration

Non-compliance may result in enhanced inspection, corrective-action requirements, service restrictions, suspension, administrative penalties, withdrawal or revocation of documents, or deletion from the Registry, to the extent authorized by law and the applicable written authority. Except where immediate protective action is necessary for safety, security, sanctions compliance, documentary integrity or preservation of evidence, an affected person will be notified of the material grounds and given a reasonable opportunity to respond. A request for reconsideration must be submitted in writing to the Office of the Maritime Administrator with supporting evidence within ten business days of the written decision, unless a shorter period is stated because of an urgent risk.

Supersession and effective application

This amended Circular supersedes the prior version of Circular No. 018 from the effective date stated above. Existing obligations, liabilities, investigations, fees and corrective actions arising under the prior version remain enforceable to the extent lawfully incurred and are to be administered under the clearer procedures stated in this amended version. If this Circular conflicts with a later Act, regulation or controlled VISR policy, the higher or later instrument prevails and the Circular shall be updated through document control.



Saade Makhlouf

Maritime Administrator of the Republic of Vanuatu
Vanuatu International Shipping Registry

Issued in Port Vila and New York
20 August 2026