



# Antigua and Barbuda

## Maritime Administration

Miscellaneous Circular  
No. 2025-002  
8 September 2025

**SUBJECT:** Pleasure Yachts engaged in trade (Dual-Mode Registration)

**REFERENCE:**

- a) *Merchant Shipping Act 2006 (as amended)*
- b) *Red Ensign Yacht Code*

**TO:** Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organizations.

### 1. PURPOSE

This Circular provides information on the requirements and procedures for Pleasure Yachts Engaged in Trade (PYET) under the Antigua & Barbuda flag. It provides a pathway for eligible yachts to be dual registered for both private and commercial operation, while maintaining the safety, technical, and manning standards expected for commercial yachts. This framework is designed to protect Antigua & Barbuda's international standing, align with IMO conventions, and avoid compliance disputes at Port State Control.

### 2. APPLICATION

This Circular applies to all Antigua & Barbuda-registered yachts that:

- are  $\geq 24$  meters Load Line length, and
- intend to operate in both private and commercial (charter for reward) modes.

### 3. BACKGROUND

ADOMS has developed a framework for dual registration of yachts. This arrangement allows a yacht to be registered for both private use and commercial charter under the Antigua & Barbuda flag, enabling owners to switch modes without undergoing a full re-registration process. The concept is based on ensuring that yachts always meet the highest safety, technical, and survey standards required for commercial operation, even when operating privately.

## **4. OBLIGATIONS AND RESPONSIBILITIES**

### **1. Key Principles**

1. When trading, the yacht must meet full commercial standards – there is no 'limited charter' relaxation.
2. Continuous compliance with applicable Codes, IMO conventions, and class requirements is mandatory.
3. Mode-switch transparency – ADOMS must be notified in advance when the vessel changes operational mode.
4. Port State Control readiness – documentation, manning, and onboard condition must always match the declared mode.

### **2. Eligibility**

1. The yacht must be in Class with a Recognized Organisation authorized by ADOMS.
2. Commercial compliance must be achieved before any charter commences.

### **3. Application Process**

#### **1. Dual-Mode Declaration**

1. Completed and signed “Antigua & Barbuda Dual Registration Declaration Form” (Annex A).
2. Indicate operational intention (private and commercial).

#### **2. Supporting Documentation**

1. Valid Class certificate and survey reports.
2. Compliance with the Large Yacht Code (LY3, REG Code Part A, or equivalent).
3. Statutory Certificates as per yachts GT and year of build.
4. MLC and, where applicable, evidence of full MLC compliance.
5. Minimum Safe Manning proposal for commercial mode.
6. Insurance certificates covering both private and commercial use.

#### **3. Provisional Authorization**

1. The yacht may be provisionally registered as pleasure vessel pending completion of provision of commercial certification and issuance of commercial certificates.

### **4. Surveys & Certification**

#### **1. Codes:**

1.  $\geq 24$  m : Large Yacht Code / REG Yacht Code Part A / LY3 équivalent.

#### **2. Certificates:**

1. Full commercial suite (Safety Construction, Safety Equipment, Radio, MLC, Safe Manning, Load Line, Tonnage).
2. Separate certificates are set for private mode where applicable.
3. Class: the yacht must always remain in Class.

## **5. Change of Mode Procedure**

1. The owner or Master must give advance written notice to ADOMS specifying:
  1. Date and time of mode change
  2. Intended trading period and operating area
  3. Certificates for active mode must be displayed; inactive mode certificates must be kept onboard but not displayed.
  4. Logbook entry recording date/time of change, signed by the Master.

## **6. Operating Limits**

1. Passenger limit: maximum 12 unless certificated as a passenger ship.
2. All manning, survey, and insurance requirements must correspond to the current mode.
3. No separate 'limited days' charter scheme is offered under ADOMS.

## **7. Bareboat Charter Operations in U.S. Waters**

1. Owners are strongly advised to seek U.S. legal advice regarding Passenger Vessel Services Act (PVSA) requirements before engaging in bareboat charter in U.S. waters.

## **8. Compliance & Enforcement**

1. Failure to comply with this circular may result in:
  1. Suspension of commercial operating privileges
  2. Financial penalties under the Merchant Shipping Act
  3. Possible de-registration in serious cases

### **Issued by**

Antigua and Barbuda  
Department of Marine Services and Merchant Shipping  
(ADOMS) St. John's

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## Annex A – Dual Registration Declaration Form

### Antigua & Barbuda Dual Registration Declaration Form

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This form must be completed by the yacht owner or authorized representative.

Vessel Name	
Official Number	
IMO Number	
Owner Name	
Managers name	
Proposed Operational Modes	<input type="checkbox"/> Private Yacht <input type="checkbox"/> Commercial Yacht

**Declaration:**

I, the undersigned, declare that the above vessel will operate in the modes indicated, and that the vessel will meet all safety, technical, and manning requirements for the applicable mode at all times. I undertake to notify ADOMS before any change of operational mode.

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Name: \_\_\_\_\_

Position: \_\_\_\_\_