



Antigua and Barbuda

Maritime Administration

Miscellaneous Circular
No. 2026-003
11 August 2026

SUBJECT: The carriage of additional guests on yachts

REFERENCE:

- a) *Merchant Shipping Act 2006 as amended*
- b) [The Antigua and Barbuda Merchant Shipping\(Vessels in Commercial use for Sport or Pleasure\) Regulations, 2022](#)

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

1. PURPOSE

This Circular provides information on ADOMS's regulatory framework, policy, and expectations regarding the scope of an operator's risk assessment for the carriage of additional guests on yachts.

2. APPLICATION

This Circular applies to Antigua & Barbuda flagged Pleasure, Commercial and Passenger Yachts over 24 meters in registered length who wish to carry additional guests over and above the permitted numbers by vessel certification.

3. BACKGROUND

The Antigua & Barbuda Department of Marine Services and Merchant Shipping (ADOMS) frequently receives inquiries regarding the carriage of additional guests on large yachts and passenger yachts, ranging from near-coastal cruising in private use to events alongside.

The purpose of this Circular is to set out ADOMS's regulatory framework, policy, and expectations regarding the scope of an operator's risk assessment.

For the purposes of this Circular, the term "additional guests" means persons embarked above the number of passengers that:

- A Large Yacht (REG Code Part A or AB CCA1) is certified to carry in commercial use (i.e. 12 passengers), or
- A Passenger Yacht (REG Code Part B) is certified to carry in either private or commercial use (i.e. 36 passengers).

Included in the number of "additional guests" are security, catering, and entertainment personnel required for the event. This does not include "occasional workers" (as defined in REG Yacht Code Common Annexes, Annex E) where such staff are signed on as occasional workers.

4. OBLIGATIONS AND RESPONSIBILITIES

1. REGULATORY FRAMEWORK

1. For Large Yachts wishing to cruise with up to 36 guests in private use on an occasional basis, ADOMS may - under the authority of Regulation 8 of The Antigua and Barbuda Merchant Shipping (Vessels in Commercial use for Sport or Pleasure) Regulations, 2022 grant an exemption from full compliance, provided an alternative provision is applied that is at least as effective as that required by the Regulations or the Passenger Yacht Code. These exemptions are time-limited, area-specific, and normally restricted to voyages within 60 nm of a safe haven.
2. Passenger Yachts are not permitted to cruise with additional guests, even in private use.
3. For Large Yacht and Passenger Yacht events at anchor, ADOMS may grant equivalent provisions under the same Regulation 8 authority. For events at anchor within Port Authority limits, an exemption is required and will be subject to the Port Authority's agreement. For events at anchor outside Port Authority limits, an exemption is required and will be subject to the Coastal State's agreement. In each case, ADOMS will initially issue a draft exemption pending the agreement of the authority having jurisdiction over the waters in which the vessel is operating. Other scenarios will be considered on a case by case basis in consultation with that authority. For large private events or commercial events at anchor, ADOMS will issue a draft dispensation for the vessel to obtain the agreement of the relevant authority before final issue.
4. For events alongside, ADOMS' approval is not mandatory; however, a Letter of No Objection (LONO) may be issued upon request by a Harbour Master/Port Authority, insurer, the Master, or the ISM Company.
5. Compliance with this Circular does not remove the obligation to comply with national or local regulations of the port, coastal state, or marina jurisdiction where the yacht operates. Where a vessel is operating outside Antigua and Barbuda waters, agreement to carry additional guests must also be sought from the authority having jurisdiction over those waters. Otherwise there is a risk of the vessel being detained by Port State Control and penalties being imposed against the Master and Owner.
6. The Master/Management Company is responsible for compliance with local requirements.
7. Appendix A summarizes the maximum numbers permitted in private use. Appendix B sets out the position for commercial use, where no maximum numbers are prescribed and the number of additional passengers is determined by the risk assessment and subject to the agreement of the authority having jurisdiction, in accordance with paragraph 3 above.

2. APPLICATIONS

1. Applications for an ADOMS dispensation or LONO must be submitted with:
 1. A detailed Risk Assessment
 2. Send all applications to: technical@abregistry.ag

3. PRE-REQUISITES

1. The yacht must:
 1. Large Yacht ≥ 500 GT – Hold a valid Large Yacht Certificate or Statement of Compliance (ISPS and MLC may be excluded for pleasure yachts in private use).
 2. Large Yacht < 500 GT – Hold a valid Large Yacht Certificate or Statement of Compliance (MLC may be excluded for pleasure yachts in private use).
 3. Passenger Yacht – Hold a valid Passenger Ship Safety Certificate or Passenger Yacht Safety Certificate.

4. RISK ASSESSMENT REQUIREMENTS

1. The Risk Assessment is the responsibility of the Master and the Management Company or Owner. It is prepared by the Management Company in conjunction with the Master and, being dynamic, is kept under review by them. It is provided to ADOMS for record purposes only and is not reviewed or approved by ADOMS. For yachts without an Antigua and Barbuda DOC holder as manager, additional information on Mini-ISM and manning is required.
2. A pre-prepared, adaptable Risk Assessment is recommended to allow rapid event-specific adjustments. Where the Risk Assessment is properly carried out, the exemption or LONO issued by ADOMS need only reference the latest revision of the Risk Assessment tailored to the specific event together with the key conditions and limitations, namely the nature of the event, the date or dates, the location or cruising area, and the number of persons. ADOMS may examine Risk Assessments for adequacy during annual surveys or ISM shipboard or company audits.

3. Properly conducted Risk Assessments should at a minimum address the following:

- 1. Events alongside:**

1. harbour master agreement
2. insurer agreement
3. agreement of adjacent vessels, particularly if designated as a secondary means of escape in an emergency
4. impact on stability; where large numbers of additional guests are proposed, the stability loading case is to be prepared by a suitably qualified and experienced naval architect
5. state of tide during event
6. forecast weather conditions
7. guest counting, ship and shoreside
8. guest and staff briefing
9. limitations on smoking
10. risk from temporary entertainment or outside cooking equipment
11. control of guests wandering outside designated event areas
12. crew compliance with hours of work and rest
13. additional security and catering staff
14. the need for crowd control training
15. widely separated points of egress
16. gangway overloading
17. evacuation time
18. secure assembly station shoreside

- 2. Events at anchor/river buoy**

1. As per events alongside, plus: -
 1. port authority agreement
 2. garbage management
 3. sewage management
 4. Life raft capacity for 100% of the total number of persons embarked if within port authority limits, and 125% of the total number of persons embarked if outside port authority limits
 5. Lifejackets sufficient for 110% of the total number of persons carried on board including child lifejackets or infant lifejackets for each child or infant onboard.
 6. muster station 'loadings'; considering the need for 'virtual crew corridors' and ample space for
 7. crew to undertake emergency duties unimpeded (i.e. fire team dressing, flaking out fire hoses, preparations for evacuation).
 8. maximum significant wave height for safe guest transfer.
 9. estimation of the total evacuation time, ship to shore*.

**In many cases, for large events we require a local passenger vessel to be on standby near the yacht capable of accommodating all additional guests, rather than relying on multiple tenders.*

The additional guests should not be provided with overnight accommodation. Contact details for Port and Coastal States can be found on IMO's Global Integrated Shipping Information System (GISIS) under 'Contact Points'.

3. Large Yachts cruising with up to 36 guests occasionally

1. As per events alongside and at anchor/river buoy, plus:
 1. coastal state agreement
 2. proximity of search and rescue services.
 3. Safety Equipment Certificate and Large Yacht Code Certificate/Statement covering the total number of persons.
 4. International Sewage Pollution Prevention Certificate covering the total number of persons.

Issued by

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

Appendix A - Maximum Number of Guests (Private Use)

Cruising

The maximum total number of guests (i.e. number of guests certified to carry plus additional guests)	Cruising	Exemption Required
Large Yacht $\geq$ 500 GT	36	No
Large Yacht < 500 GT	36	Yes
Passenger Yacht	60	No

If more than the above numbers are proposed, a draft of the flag State exemption will require Coastal State acceptance before being finally issued.

At Anchor

	The maximum number of additional guests	Exemption Required
Large Yacht $\geq$ 500 GT	Additional guests not exceeding the aggregate tender capacity, or 36 guests in total, whichever is more.	No
Large Yacht < 500 GT	Additional guests not exceeding the aggregate tender capacity, or 36 guests in total, whichever is more.	Yes
Passenger Yacht	Additional guests not exceeding the aggregate tender capacity, or 60 guests in total, whichever is more.	No

Aggregate tender capacity is the total capacity of the yacht's own tenders, both those normally stowed onboard and any auxiliary tenders.

If more than the above numbers are proposed, a draft of the flag State exemption will require Port Authority or Coastal State acceptance, as appropriate, before being finally issued.

Examples:

If a Large Yacht of 500 GT or more is designed to normally carry 12 guests and has two shipboard tenders each designed to carry 8 guests, and an auxiliary tender designed to carry 12 guests, no exemption is required for up to 40 guests (12 plus 8 plus 8 plus 12).

If a Large Yacht of 500 GT or more is designed to normally carry 12 guests and has only one shipboard tender designed to carry 8 guests, no exemption is required for up to 36 guests, although the safety case risk assessment may determine that an additional local tender, with tender operator, needs to be hired.

If a Passenger Yacht is designed to normally carry 28 guests and has two shipboard tenders each designed to carry 12 guests, and an auxiliary tender designed to carry 12 guests, no exemption is required for up to 64 guests (28 plus 12 plus 12 plus 12).

Appendix B - Additional Passengers (Commercial Use)

In commercial use, no maximum numbers are prescribed. The number of additional passengers is determined by the risk assessment and is subject to the agreement of the authority having jurisdiction over the waters in which the vessel is operating. The following applies:

Scenario	Requirement	Authority Agreement
Events alongside	No exemption required. A Letter of No Objection (LONO) may be issued on request.	Not required
Events at anchor within Port Authority limits	Exemption required.	Port Authority
Events at anchor outside Port Authority limits	Exemption required.	Coastal State

In each case, ADOMS will initially issue a draft exemption pending the agreement of the authority having jurisdiction. Other scenarios will be considered on a case by case basis.

Included in the number of additional guests or passengers are any security, catering and entertainment personnel hired for the event, unless the staff are signed on as occasional workers (see REG Yacht Code Common Annexes, Annex E).

Appendix C

The following is an example only, provided for guidance. The Risk Assessment is the responsibility of the Master and the Management Company or Owner. It is provided to ADOMS for record purposes only and is not reviewed, verified or approved by ADOMS, which accepts no liability for its content or adequacy.

Ship Name: **Motor Vessel One**

Risk Assessment no.:

RA036 Work Activity: **Carriage of 28 Guests in Private Use whilst Cruising in the Mediterranean**

Current Assessment Date: **01.08.25**

Last Assessment date: **01.01.25**

Hazard no.	Description of Identified Hazard	Existing Control Measure
1.	Event not permitted by Authorities that have jurisdiction	Harbour Master Agreement is always sought Coastal State Agreement is always sought Flag State Agreements is always sought
2.	Event not permitted under Insurer standard terms	Insurer Agreement is always sought
3.	Inadequate stability	Master judgment only; not supported by calculations.
4.	Gangway Overloading	Warning sign of maximum working load posted
5.	No Search and Rescue Services	Vessel operation will be limited to the Mediterranean and 60nm from a <u>safe haven</u>
<i>Etc.</i>		

Assessment of Risk Factor

Likelihood of Harm	Severity of Harm		
	Slight Harm	Moderate Harm	Extreme Harm
Very Unlikely	Very Low Risk	Very Low Risk	Medium Risk
Unlikely	Very Low Risk	Medium Risk	High Risk
Likely	Low Risk	High Risk	Very High Risk
Very Likely	Medium Risk	Very High Risk	Very High Risk

Hazard No.	Likelihood of Harm	Severity of Harm	Risk Factor
1	Unlikely	Slight Harm	Very Low Risk
2	Very Unlikely	Slight Harm	Very Low Risk
3	Likely	Extreme Harm	Very High Risk
4	Likely	Moderate Harm	High Risk
5	Unlikely	Moderate Harm	Medium Risk
<i>Etc.</i>			

NB. If the Risk Factor is Medium or above, additional control measures should be implemented. Additional Control Measures

Hazard no.	Further Risk Control Measures	Remedial Action Date	Review Date
3	Suitably qualified and experienced Naval Architect to produce a load case for 28 guests on uppermost deck, including a worst case distribution with persons concentrated to one side, and submit to Class for approval	31.05.25	N/R
4	To be covered in guest pre-boarding briefing Crew member to be always posted at gangway.	01.05.25	01.08.25
5	The availability of SAR services to be checked as part of the passage planning; shipboard checklist to be update accordingly	01.05.25	01.08.24
<i>Etc.</i>			

Appendix D - Definitions

The following definitions are taken from the Merchant Shipping Act of Antigua and Barbuda.

"pleasure yacht" means a ship however propelled that is used exclusively for pleasure and does not carry passengers or cargo for hire or reward; but does not include a ship that is provided for the transport or entertainment of lodgers at any institution, hotel, private hotel, boarding house, guest house and other establishment.

"passenger" means any person carried on board a ship except:

- (a) a person employed or engaged in any capacity on board the ship on the business of the ship;
- (b) a person on board the ship either in pursuance of the obligations laid upon the master to carry shipwrecked, distressed or other persons or by reason of any circumstances which neither the master nor the charterer, if any, could have prevented or forestalled; and
- (c) a child under one year of age.

"passenger ship" means a ship carrying or capable of carrying more than twelve passengers.

For the purposes of this circular, private use means a pleasure yacht not engaged in trade, that is, not carrying passengers or cargo for hire or reward.