



TUVALU SHIP REGISTRY

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MARINE CIRCULAR

MC-3/2026/1

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FOR: Ship Owners, Ship Managers, Recognized Organizations, Ship Builders, Ship Operators, Agents, and Surveyors

SUBJECT: INTERPRETATION OF “TO THE SATISFACTION OF THE ADMINISTRATION” IN INTERNATIONAL CONVENTIONS AND CODE

DEFINITIONS:

The following abbreviations stand for:

- “DOC” – Document of Compliance as required by the ISM Code
- “IACS” – International Association of Classification Societies.
- “IMO” – International Maritime Organization.
- “PSC” – Port State Control
- “RO” – Recognized Organization authorized by the Administration.
- “UI(s)” – Unified Interpretation(s) issued by IACS.
- “UR(s)” – Unified Requirement(s) issued by IACS.

The Administration means the Tuvalu Ship Registry.

PURPOSE:

This marine circular clarifies how the Administration will approach provisions in international instruments that require a matter to be accepted “**to the satisfaction of the Administration**”, and sets out the order of reference for interpretations to support consistent application by Companies and ROs.

APPLICATION:

This marine circular applies to:

- (a) All Tuvalu-flagged ships;
- (b) All ROs acting on behalf of the Administration; and
- (c) All parties involved in design, construction, survey and operation of Tuvalu-flagged ships

CONTENTS:

1. General Approach

- 1.1. Where an international requirement states that a matter is “to the satisfaction of the Administration”, the Administration expects the outcome to be achieved in a verifiable and consistent manner, based on recognized technical standards and internationally accepted interpretations.
- 1.2. The Administration may issue flag State requirements via circulars, emails, etc., containing guidance / instructions that record the Administration’s accepted methods, evidence and interpretation for such provisions.

- 1.3. Where guidance / instructions by the Administration exists, it shall take precedence for Tuvalu-flagged ships.
- 1.4. Companies shall ensure the applicable evidence and records are maintained onboard and/or ashore as required, and should be produced upon request by the RO, the Administration, or PSC.

2. Use of IMO Guidance / Circulars and IACS UIs:

If the Administration has not issued a specific interpretation on a particular provision, the latest relevant IMO Guidance / Circulars, and IACS UIs/URs may be applied to promote a harmonized implementation, provided they do not conflict with any preceding instructions by the Administration.

3. RO interpretation where precedence by the Administration and IMO / IACS instructions do not exist:

As the Administration has delegated all the duties of reviewing plans and survey to the RO, the RO is authorized to apply a reasonable and practicable technical interpretation within the limits of the applicable instrument, using standards and criteria acceptable to the RO, for all matters not covered by the Administration's instructions or by relevant IMO Guidance / Circulars and/or IACS UIs.

4. Where Clarification is Required:

- 4.1. For queries relating to any provisions containing the text "to the satisfaction of the Administration", **Companies should approach the vessel's RO in the first instance.**
- 4.2. The Administration may be contacted at technical@tvship.com through the RO where further clarification is required.

Yours sincerely,
Deputy Registrar
Tuvalu Ship Registry