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San Marino Policy Letter

SMPL - 2022-TEC-010

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San Marino Ship Register SMSR

Pre-registration Inspection Requirements

TO: Recognised Organisations, Shipowners, Managers, Masters, Seafarers, SMSR partners, SMSR brokers, Surveyors, and the general public.



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Pre-registration Inspection Requirements

1. Introduction

With reference to ph. 2.2 of SMPL-2022-REG-001 rev. 2, additional requirements based on vessel age may be applied to the satisfaction of the Administration.

The Registration of vessels of 20 years of age or older (keel laid date) is generally not accepted. However, the Administration reserves the right to grant exceptions in specific cases, based on a preregistration inspection and with the possibility to apply additional requirements. Therefore, a preregistration inspection constitutes an additional requisite for registration of vessels of 20 years of age and older.

2. Scope of Application

Pre-registration inspections shall be required for authorising the registration of all vessels above 500GT and older than 20 years.

Alternative arrangements to a pre-registration inspection for yachts older than 20 years in private and commercial use up to 499GT shall be evaluated by the Administration on a case-by-case basis, following the below general principles.

In the case of large yachts up to 499GT, and of small yachts below 24m LL in commercial use, an initial safety survey by an authorised surveyor or authorised RO may be considered as equivalent to a pre-registration inspection.

In the case of private yachts below 24m, additional documentation may be evaluated in alternative to a pre-registration inspection.

3. Implementation

A pre-registration inspection is part of the risk-assessment process carried out by the Administration in order to assess the eligibility for registration with San Marino.

The pre-registration inspection areas include but are not limited to:

- (i) Class status;
- (ii) Flag Administration records;
- (iii) Vessel internal records;
- (iv) Port State Control records;
- (v) Company records.



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Following the inspection, corrective action may be required as a condition for registration in the form of audits, additional surveys, repairs, or maintenance work, to the satisfaction of the Administration. The pre-registration inspection shall be carried out by an authorised Flag State Inspector, and a report of inspection shall be submitted to the Administration for review and approval.

In specific cases, the pre-registration inspection may be carried out by an authorised Recognised Organisation, provided that the vessel be inspected by a Flag State Inspector at the next Flag State Inspection window. A record of the pre-registration inspection shall be kept in the register.

The Administration shall examine any alternative arrangements not included in this policy letter on a case-by-case basis.