



Antigua and Barbuda
Maritime Administration

SOLAS Circular
No. 2013-005
Rev 1
8 April 2021

SUBJECT: Maintaining the Continuous Synopsis Record (CSR)File

REFERENCE:

- a) *International Convention for the Safety of Life at Sea (SOLAS) Chapter. XI-1 Regulation.5*
- b) [*IMO Resolution MSC.198\(80\) Adoption of amendments to the format and guidelines for the maintenance of the Continuous Synopsis Record \(CSR\)*](#)

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

1. PURPOSE

This Circular provides information on the interpretation, expectations, and requirements of the Administration in respect of maintaining the CSR.

2. APPLICATION

This Circular applies to all Antigua and Barbuda flagged ships.

3. BACKGROUND

SOLAS Chapter XI-1 Regulation 5 requires all cargo ships trading internationally of 500 GT or more and all passenger ships on international voyages, to carry a Continuous Synopsis Record (CSR). The CSR is intended to be a continuous record of changes to a set of ship's particulars including ownership, charterers, classification society, ISM manager and the ship's ISM and ISPS certification. The CSR is issued by the ship's flag State and an additional one with the next number is issued each time there is a change in one of the particulars. Each original document must be retained on board in a file which makes up the continuous record starting from 1 July 2004 when the requirement came into force.

The CSR is an important document that is frequently checked by Port State Control.

The CSR is now well established but there are some practical points on the maintenance of the CSR file, and the process for amendments and change which are contained in the IMO guidelines and which are clarified in this Circular.

4. OBLIGATIONS AND GUIDANCE/RESPONSIBILITIES

1. IMO Numbers.

1. All ships that require a CSR will have an IMO number and this is shown on the CSR document. However, Regulation IX.3-1 also requires that the registered owner of a ship, as shown on the certificate of registry, and the Company (responsible for ISM) are also each issued with an IMO number which must be shown on the CSR (and on other documents).

2. Bareboat Charterers are not required to have an IMO number.
 3. Company IMO numbers are easily obtained and can be applied for through:
<http://www.imonumbers.lrfairplay.com/>
 4. It is important that the registered owner and the Company ensure that they both obtain IMO numbers as soon as possible and inform ADOMS of the number so that the CSR data can be prepared in good time when a ship is registered in Antigua and Barbuda. Ideally the registered owner should have an IMO number prior to the date of registry.
2. Newbuildings Procedure.
1. For a ship that is being delivered from a shipyard the issuer of the first CSR (No. 1) will depend on the type of registry in Antigua and Barbuda. It will be issued by ADOMS if the vessel is to be permanently registered. If the vessel is to be bareboat registered, the first one will be issued by the underlying registry. In this case Antigua and Barbuda will issue a subsequent number which will show the change of flag from the underlying register to Antigua and Barbuda.
 2. There is 3 months “window” of time allowed for the issue of the CSR. The time window allows for the necessary period between registering a new ship and the dates when the interim audits for ISM and ISPS are completed. The identities of the organisations completing these audits must be shown on the CSR and hence the CSR cannot normally be prepared until the audits are complete.
 3. However, PSC officials expect to see a CSR. To deal with this the Master should complete a Form 2 as soon as the interim audits are complete and before the ship enters service including all the necessary data. One copy of this should be sent to ADOMS and one copy, signed by the Master or the Company, should be placed in the ship’s CSR file.
 4. If the ship is to be bareboat registered, it will first be registered in the underlying register and then bareboated to Antigua and Barbuda. In this case the first CSR will be issued by the underlying registry and the Master or the Company, on registering in Antigua and Barbuda, should also complete a Form 3 listing all the changes that will apply from permanent registry in the underlying register to bareboat registry in Antigua and Barbuda. This document should be placed in the CSR file and then a Form 2 should be completed, and a copy placed in the file while one copy is sent to ADOMS.
 5. As soon as the ADOMS office dealing with the registry (Oldenburg or St. John’s) has the full set of data, and a Form 2 if necessary, the definitive CSR will be issued for transmission to the ship.
 6. As soon as it is received on board, the Master should sign and date it in the spaces provided and insert it in the CSR file. The original Form 2 and any Form 3 should remain in the file permanently between the last CSR and the new one containing the changes listed in the Forms 2 and 3.

3. Ships transferring into the Antigua and Barbuda flag

1. For existing ships, the process is similar. As soon as the change of registry is completed, the Master or owner should complete a Form 3 (Index of changes) listing all the changes and place this as the next document after the last CSR in the file. He should also complete a Form 2 which is effectively the next temporary CSR, place it in the file and send a copy of this to the ADOMS office dealing with the registry. The Form 2 in this instance will show the applicable date as the date of registry in Antigua and Barbuda and the date ceased to be registered in the previous state as the same date.
2. The ship should be issued with a final CSR by the last flag State showing in field 15 the date of leaving the previous registry. However, in some cases flag States may take some time before issuing the final CSR and the ship may not have this on board at the time of registry in Antigua and Barbuda. If this is the case, the Master, or the Company should note that fact in the “remarks” field on the Form 2 and assign a number to the form 2 which misses out the expected number of the final CSR from the previous flag State.
3. The Company, or the Master, should ensure that, as soon as the final CSR is received from the last flag state, a copy is sent to ADOMS and the original placed in its correct place in the CSR file.
4. There is a three month “window” allowed between the change affecting the CSR file and the placement of the actual next document in the file. The Forms 2 and 3 form the temporary CSR until the final document is received on board, signed for, and filed. The Forms 2 and 3 remain in the file between the last CSR and the new one including the changes listed in the forms 2 and 3.
5. If a flag State fails to provide a final CSR, there is an opportunity for Antigua and Barbuda to make a note of this in the “remarks” field of the first Antigua and Barbuda CSR and to issue the CSR number that would apply if the final one from the last flag had been issued which will maintain the record correctly.

4. Changes during a period of registry

1. Any changes that occur to any of the data shown on the CSR during the period that a ship is registered in Antigua and Barbuda should be recorded on a Form 3 (Index of changes) which is placed with the last CSR and noted on a Form 2. Only the changes that have taken place need to be completed on the Form 2 – all other data entries are marked N/C (no change).
2. The completed Form 2 is placed on the CSR file and a copy is to be sent to ADOMS. On its receipt the next sequential CSR will be issued and transmitted to the ship. ADOMS will try to ensure that the next CSR is delivered to the ship as quickly as possible, and as with other situations there is a three month “window” of time for its receipt on board during which the Forms 2 and 3 will act as the temporary CSR.

5. Procedure on leaving the Antigua and Barbuda Register

1. On the ship leaving the register the Master or the Company should again complete a Form 3 and a Form 2 and place one copy of each in the ship's CSR file, and send one copy of the Form 2 to ADOMS. On its receipt ADOMS will issue the final Antigua and Barbuda CSR which should again be placed in the ship's CSR file.
2. The file MUST be retained on board and must be transferred with the ship in any change of flag or change of ownership or change of Company. This is of critical importance as the CSR file is intended, and required, to form a permanent record of all changes through the entire life of the ship.
3. It should not be removed from the ship at any time.

6. Forms.

1. Copies of the Antigua and Barbuda Form 2 (Amendments to the Continuous Synopsis Record) and the Form 3 (Index of Amendments to the CSR) are available on the ADOMS website: www.abregistry.ag

7. Copies and lost documents.

1. ADOMS is required to receive copies of the full set of CSRs issued by previous flag States from the last flag State at the time of registry in Antigua and Barbuda and to retain this set for transmission to the next flag State if the ship later leaves the Antigua and Barbuda register.
2. If a ship's CSR file is damaged or lost, it is therefore usually possible for ADOMS to issue duplicate CSRs to the ship. There is no charge for this service for ships remaining registered in Antigua and Barbuda, however if a ship has left the register and later requires duplicates of CSRs issued by Antigua and Barbuda while the ship was registered in Antigua and Barbuda, there is a charge for supplying these.

8. Errors.

1. It is important that the Master check the data on each issued CSR carefully. The process for issue can take time, and because the data is sometimes reaching ADOMS via different routes it is possible for errors to appear. While ADOMS will make every effort to ensure that issued CSRs are free from errors, it remains possible, and it is the Master's responsibility to check each one on receipt to ensure that it is correct in every detail.
2. If mistakes are found the master should issue a new Form 2 indicating the mistake and send it to ADOMS which will correct the CSR.

Issued by

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