



REPUBLIC OF  
THE MARSHALL ISLANDS  
MARITIME ADMINISTRATOR

Marine Guideline

No. 2-11-24

Sep/2024

**TO: ALL SHIPOWNERS, OPERATORS, MASTERS AND OFFICERS OF MERCHANT SHIPS, AND RECOGNIZED ORGANIZATIONS**

**SUBJECT: Tonnage Guidelines for Yachts**

- References:**
- (a) ITC '69, *International Convention on Tonnage Measurements of Ships, 1969*
  - (b) IMO Circular [TM.5/Circ.6](#), *Unified Interpretations relating to the ITC, 1969*, issued 19 May 2014
  - (c) RMI Yacht Code 2021 ([MI-103](#))
  - (d) IACS [UI TM2](#), *International Tonnage Convention 1969 – Heat Exchangers (Coolers) Treatment*

## PURPOSE

This Marine Guideline (MG) provides additional guidance from the Republic of the Marshall Islands (RMI) Maritime Administrator (the “Administrator”) on applying the International Convention on Tonnage Measurements of Ships, 1969 (ITC '69) and IMO Circular [TM.5/Circ.6](#) for typical yacht arrangements.

## BACKGROUND

In accordance with ITC '69 Regulation 1(3):

*The gross tonnage and the net tonnage of novel types of craft whose constructional features are such as to render the application of the provisions of these Regulations **unreasonable** or **impracticable** shall be as determined by the Administration.*

As per IMO Circular [TM.5/Circ.6](#):

*In applying these novel craft provisions, the resulting gross and net tonnages should be reflective of the ship's **overall size and useful capacity**, respectively. A novel type of craft should be understood as one which is novel in its design and should not include existing traditional types of ships of usual shape or those types already covered by the Unified Interpretations.*

Yachts can be regarded as purpose-built ships with unique constructional features in exterior areas, designed for esthetic purposes or guest recreation. These features do not affect the yacht’s **overall size** or **useful capacity**, and it would be **unreasonable** to include them in the yacht’s tonnage.

This guidance identifies such constructional features for the uniform application of ITC ’69 for typical yacht arrangements.

## APPLICABILITY

This MG applies to all RMI-flagged yachts of 24 meters or more in length subject to compliance with ITC ’69, with build contracts signed on or after 1 January 2025 and projects with build contracts signed before 1 January 2025, where the keel will be laid no later than 1 January 2026.

Unique constructional features which negatively impact on the safety of the yacht (meaning seaworthiness, operation, or maintenance), or the safety of the crew and passengers, or which provide enhanced protection of excluded spaces from the sea or weather, will not be considered.

## GUIDANCE

### 1.0 Summary Table of Typical Excluded Spaces

Constructional Feature	Impact		Included in GT
	Overall Size	Useful Capacity	
Bulwarks: inaccessible <sup>†</sup> and <1 m <sup>2</sup> Cross Sectional Area (CSA)	No	No	No
Isolated Fairing Structures: inaccessible <sup>†</sup> and <1 m <sup>3</sup>	No	No	No
Mast Structures: inaccessible <sup>†</sup>	No	No	No
Radar/Satellite covers (i.e. protection/safety domes)	No	No	No
Exterior False ceilings: without storage or equipment	No	No	No
Isolated Exterior Furniture: ≤1 m <sup>3</sup> without storage	No	No	No
Isolated Exterior Detachable Furniture: with storage ≤1 m <sup>3</sup>	No	No	No
Swim Platform: inaccessible and ≤1 m <sup>3</sup> or <1 m <sup>2</sup> CSA	No	No	No
Gangway storage box: above upper deck	No	No	No

<sup>†</sup> Bolted plates or fixed panels to excluded inaccessible spaces are permitted where essential for the inspection and maintenance of the concealed structure (meaning, in way of bulwarks, fairing structures, mast structures and swim platforms).

## 2.0 Summary Table of Typical Included Spaces<sup>1</sup>

Constructional Feature	Impact		Included in GT
	Overall Size	Useful Capacity	
Bulwarks: $\geq 1$ m <sup>2</sup> CSA	Yes		Yes
Bulwarks: accessible <sup>††</sup>		Yes	Yes
Isolated Fairing Structures: $\geq 1$ m <sup>3</sup>	Yes		Yes
Fairing Structures: accessible <sup>††</sup>		Yes	Yes
Mast Structures: accessible		Yes	Yes
Exterior False Ceilings: with storage		Yes	Yes
Exterior False Ceilings: with equipment		Yes	Yes
Exterior Permanently Fixed Furniture: with storage		Yes	Yes
Swim Platform: $\geq 1$ m <sup>2</sup> CSA	Yes		Yes
Indoor/Outdoor spaces (meaning, portable glass partitions)		Yes	Yes
Permanent Deck Modules (see § 4.6 below)	Yes	Yes	Yes

<sup>††</sup> Separate storage areas within these spaces and entirely dedicated for ‘float-free’ liferafts may be excluded from the total volume (V).

## 2.0 Regulation 2(1) Upper deck

As per IMO Circular [TM.5/Circ.6](#) R.2(1)-1 to 3, for the discontinuity (or step) in the upper deck to be recognized as the moulded depth it must extend over the full breadth of the yacht, be in excess of 1 m, and importantly, be within the load line length. (See Figure 1 in Appendix B)

## 3.0 Regulation 2(4) Enclosed spaces

Awnings

- 3.1 Awnings, often referred to as **biminis** on yachts, should be interpreted as a fabric covering of a readily removeable tarpaulin (meaning, sheet of strong, flexible, water-resistant, or waterproof material, often cloth such as canvas or polyester coated with polyurethane or made of plastics such as polyethylene) stretched over a frame. (See Figure 1 in Appendix A)
- 3.2 **Readily removable** means secured with poppers, zips or tape; bolted or screwed fastenings are not permitted.
- 3.3 Temporary or portable partitions (meaning, glass retractable panels or deck to deck glass windbreaks) are not awnings.

1. Separate storage areas within these spaces and entirely dedicated for ‘float-free’ life rafts may be excluded from the total volume (V).

## 4.0 Regulation 2(5) Excluded spaces

### 4.1 Bulwark Structures

- .1 Bulwarks on yachts are enclosed for esthetic reasons. In line with IMO Circular [TM.5/Circ.6](#) R.2(4)-6, provided they are completely inaccessible and have not been considered in yacht's global strength or stability calculations they should not be included in the total volume of all enclosed spaces (V) if their CSA is not exceeding 1 m<sup>2</sup> in the vertical plane. (See Figure 1 in Appendix A)
- .2 Where **float-free** life rafts are incorporated in bulwark structures the dedicated separate storage area may be excluded from the total volume (V).

### 4.2 Stanchions (pillars) in way of Passageways

In applying Regulation 2(5)(b) and (c) and IMO Circular TM.5/Circ.6 R.2(5)-5, isolated stanchions (pillars) necessary to support an overhead deck which exceed 600 mm in the forward and aft direction would normally be considered as closing or reducing the size of the side opening. (See Figure 3 in Appendix A)

### 4.3 Isolated Fairing Structures

- .1 Superstructures on yachts often incorporate complex shapes for esthetic reasons. In line with IMO Circular TM.5/Circ.6 R.2(4)-6, provided they are completely inaccessible and have not been considered in yacht's strength or stability calculations they should not be included in the total volume of all enclosed spaces (V) if their enclose volume is <1 m<sup>3</sup>. (See Figure 1 in Appendix A)
- .2 **Isolated** means well separated from any other fairing structures.
- .3 Where **float-free** life rafts are incorporated in fairing structures the dedicated separate storage area they occupy should not be included in the total volume of all enclosed spaces (V).

### 4.4 Mast Structures

Masts on yachts often incorporate complex shapes for esthetic reasons. In line with IMO Circular TM.5/Circ.6 R.2(4)-6 provided they are completely inaccessible they should not be included in the total volume of all enclosed spaces (V). (See Figure 2 in Appendix A)

### 4.5 Exterior False Ceilings

Exterior deckheads on yachts are normally covered by esthetic removeable linings/ceilings. Provided stores, equipment or machinery are not located in the

concealed the air space the volume should not be included in the total volume of all enclosed spaces (V). Cables, air ducts and pipe runs are permitted to pass through these areas. Lighting and speakers may be fitted in the ceiling. (See Figure 6 in Appendix A)

#### 4.6 Deck Modules

Deck modules (such as containerized modules) installed to permanently improve the utility of the yacht (i.e., additional accommodation, vehicle storage, workshop, or laboratory) are to be included in the total volume of all enclosed spaces (V) Temporary installations (meaning, for a voyage or time-limited period) should be agreed with the Administrator.

#### 4.7 Regulations 2(5)(a), (b), (c) and (e) End Openings, Side Openings and Recesses

Exterior furniture  $\leq 1$  m in height is not considered to protect/enclose an opening. (See Figure 5 in Appendix B)

#### 4.8 Regulation 2(5)(d) Space immediately below an uncovered opening

As per IMO Circular [TM.5/Circ.6](#) R.2(5)(d)-1 the volume of any recess below the line of the upper deck (meaning, pool, jacuzzi, open tender recess, open cockpit recess) are included spaces.

#### 4.9 Gratings

- .1 As referred to in IMO Circular TM.5/Circ.6 R.2(4)-8), esthetic gratings or louvres covering side openings should be of a design and orientation that does not give any advantage in terms of protection of the excluded space from the sea or weather. (See Figure 9 in Appendix B)
- .2 As per IMO Circular TM.5/Circ.6, it is only stanchions supporting an overhead deck and safety railings above the height of a bulwark or handrail that are not considered to close or reduce the size of a side opening. As such the total of the air gaps perpendicular to the plane should meet the qualifying criteria for a side opening.
- .3 Gratings covering deck recess should be at least 30 % open in projection (meaning, perpendicular to the plane containing the grid). (See Figure 10 in Appendix B)

#### 4.10 Gangways

IMO Circular TM.5/Circ.6 R.2(4)-9 provides for machinery and other similar items to not be included in the total volume of all enclosed spaces (V). On this basis dedicated protective enclosures for gangways above the upper deck should not be included in the total volume of all enclosed spaces.

#### 4.11 Heat Exchangers (coolers) in hull recesses

Heat exchangers (coolers) fitted in hull recesses must be treated as machinery under IMO Circular [TM.5/Circ.6](#) Interpretation R.2(4)-9 and not as appendages. This is as per IACS [UI TM2](#).

#### 4.12 Rudders, stabilizers, retractable keels

IMO Circular TM.5/Circ.6 R.2(4)-9 has provision for machinery and other similar items not to be included in the total volume of all enclosed spaces (V). On this basis rudders, stabilizers and retractable keels should not be included.

#### 4.13 Furniture on exterior decks

Isolated furniture (permanently fixed or detachable) of  $\leq 1 \text{ m}^3$  enclosed volume should not be included in the total volume of all enclosed spaces (V), under the provisions of IMO Circular TM.5/Circ.6 R.6-1. (See Figure 5 in Appendix A)

- .1 Permanently fixed furniture of  $>1 \text{ m}^3$  **enclosed volume** should be included in the total volume of all enclosed spaces (V).
- .2 Isolated detachable furniture of  $>1 \text{ m}^3$  enclosed volume but with **storage volume** of  $\leq 1 \text{ m}^3$  should not be included in the total volume of all enclosed spaces (V).
- .3 **Isolated** means well separated from any other furniture.
- .4 **Detachable** means bolted or an equivalent readily removeable means of securing.
- .5 Where **float-free** life rafts are incorporated in furniture; the dedicated storage area should not be included in the total volume of all enclosed spaces (V).

#### 4.14 Exterior Furniture under a deck canopy

Exterior furniture for guest services below a deck canopy does not preclude that space from being excluded. However, the exterior furniture itself should be included if not fulfilling the above criteria for exclusion. (See Figure 5 in Appendix A)

### 5.0 Regulation 6: Calculation of Volumes

#### 5.1 Regulation 6(1) Termination of measurements

All volumes included in the calculation of gross and net tonnages must be measured, irrespective of the fitting of insulation or the like, to the inner side of the shell **of the hull** (or **to the inner side of the** structural boundary plating **for deck structures**) in yachts constructed of metal, and to the outer surface of the shell **of the hull** (or **to the inner side of the** structural boundary surfaces **for deck structures**) in yachts constructed of any other material. *If the deck structure has*

*framing, dimensions are taken to the inner surface of the skin.*

## 5.2 Regulation 6(2) Appendages

- .1 Swim platforms  $\leq 1 \text{ m}^3$  should not be included in the total volume of all enclosed spaces, as per the provisions in IMO Circular [TM.5/Circ.6 R.6-1](#) and R.6(2)-1. (See Figure 1 in Appendix A)
- .2 Small swim platforms on yachts may be enclosed for esthetic reasons. In line with IMO Circular TM.5/Circ.6 R.2(4)-6 provided they are completely inaccessible they should not be included in the total volume of all enclosed spaces (V) provided their CSA is not exceeding  $1 \text{ m}^2$  in the forward – aft direction.

## 5.3 Regulation 6(3) Spaces open to the sea

- .1 Spaces open to the sea may be excluded from the total volume (V) under the provisions of Reg.6(3).
- .2 Moonpools for launching/recovery of submersibles or ROVs, and recesses for retractable keels on sailing yachts may be excluded from the total volume (V) provided the space has no means of closure.

## 6.0 Regulation 7: Measurement and Calculation

Generally accepted methods for measurement and calculation include 3D models and numerical integration methods such as the Trapezoidal Rule and Simpson's Rule.

## 7.0 ITC Annex II - Certificate

### 7.1 Excluded spaces as per Reg.2(5).

To avoid doubt, the following **enclosed but excluded spaces** should be included on the certificate:

- .1 passageways;
- .2 boundary recesses (side and end openings); and
- .3 deck recesses.

### 7.2 An asterisk (\*) must be added to those spaces which are both enclosed and excluded spaces.

# Appendix A – Typical Yacht Features

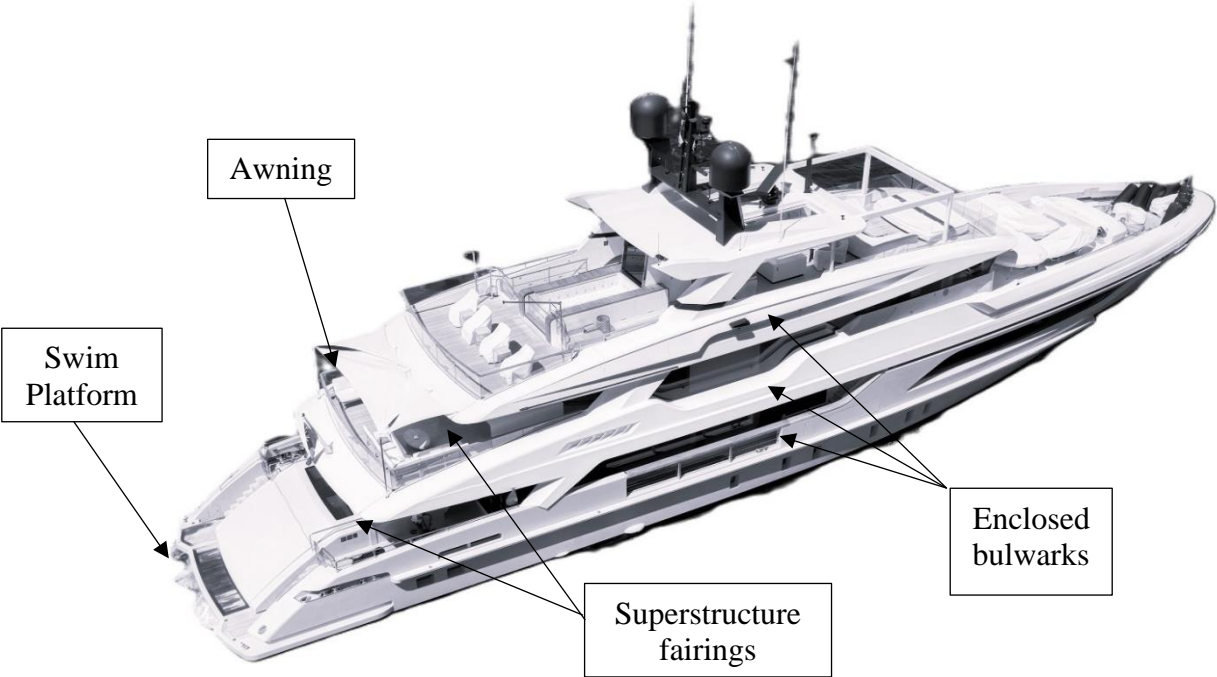


Figure 1

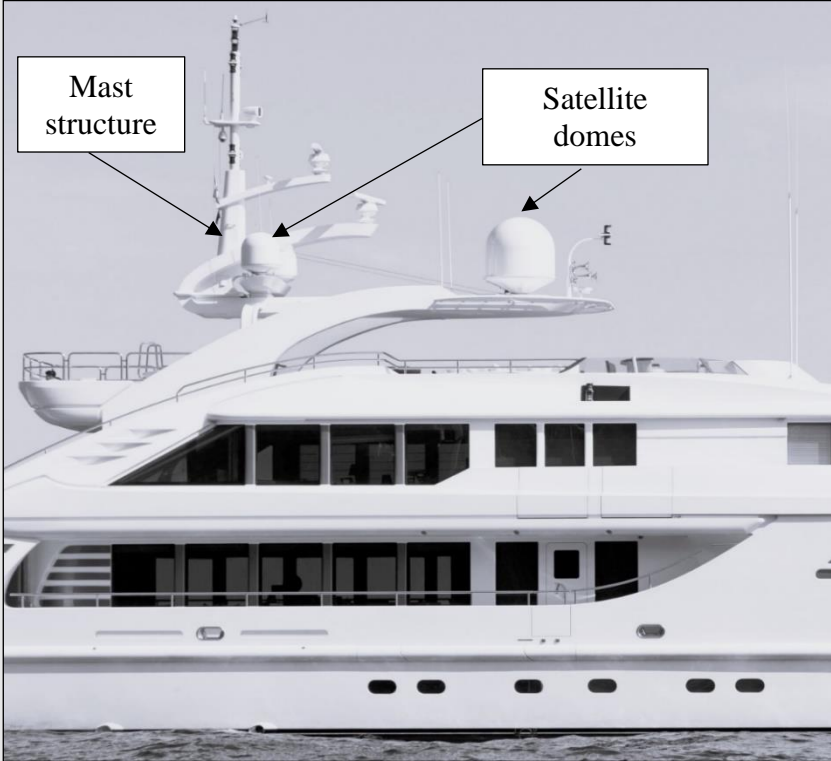
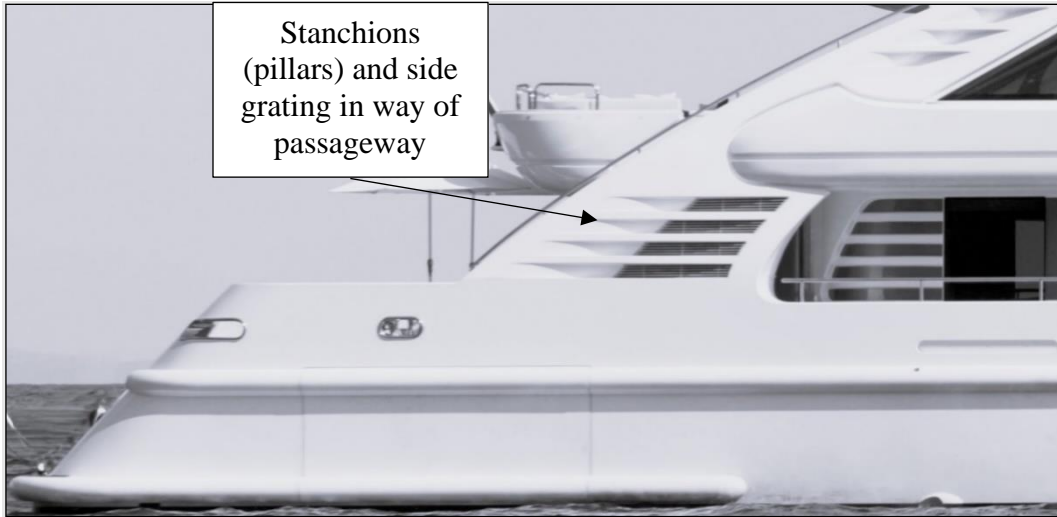
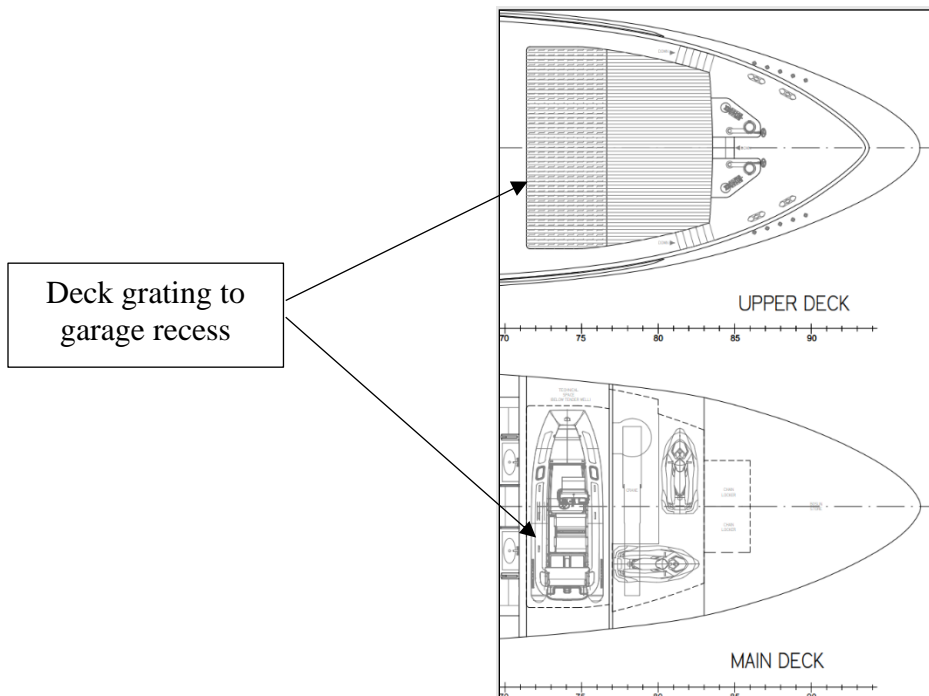


Figure 2

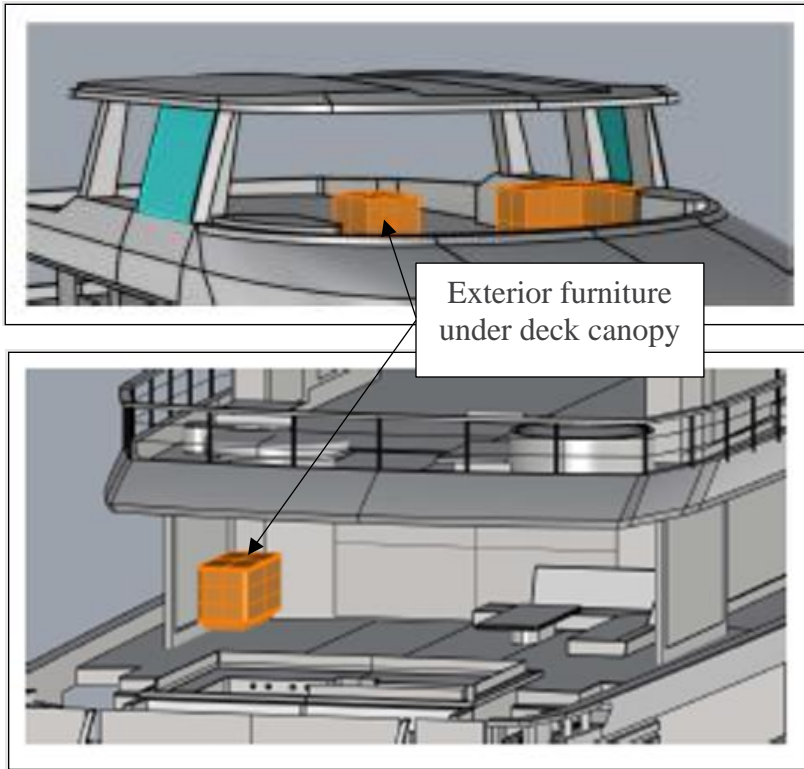




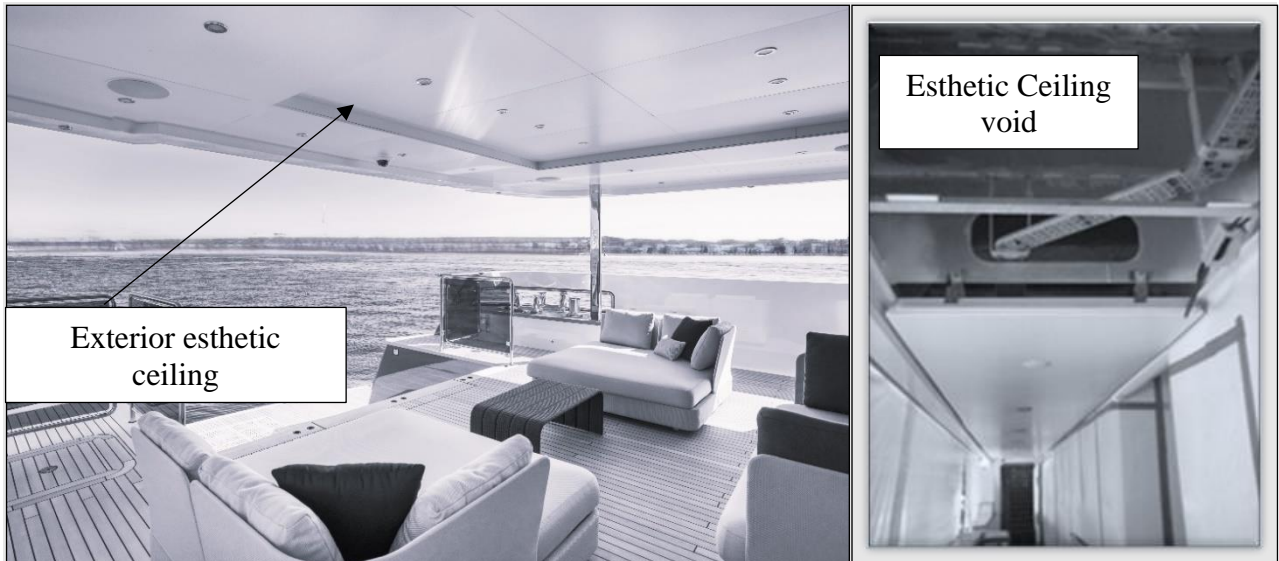
**Figure 3**



**Figure 4**



**Figure 5**



**Figure 6**

## Appendix B - Explanatory Figures

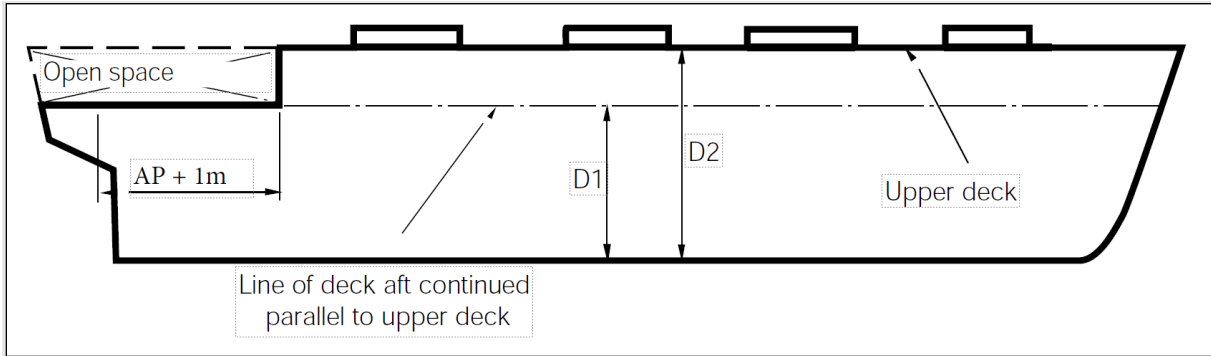


Figure 1

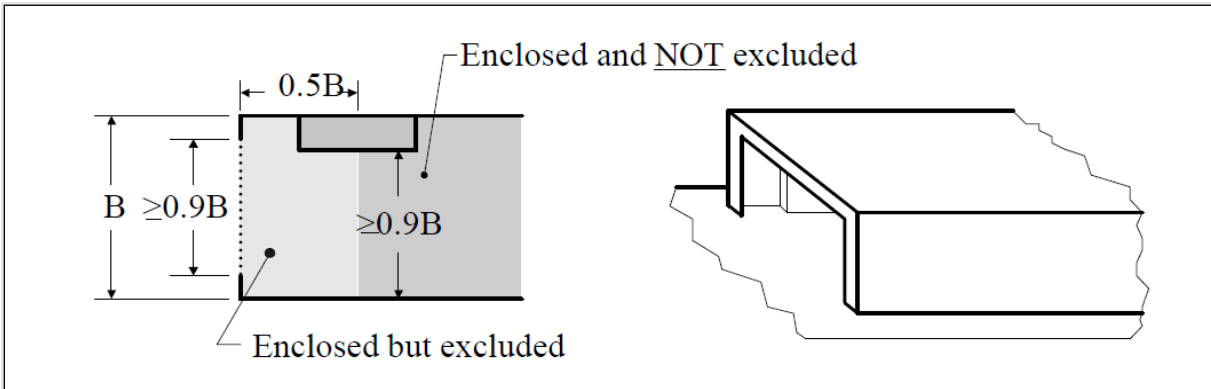


Figure 2

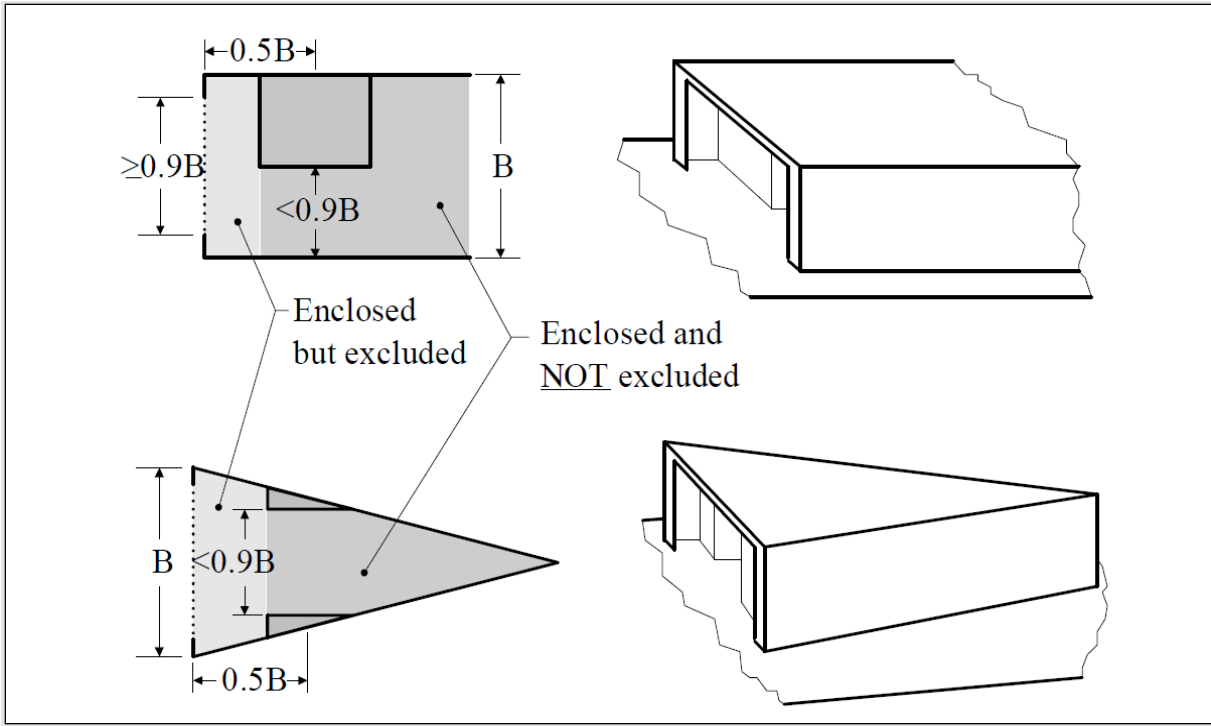


Figure 3

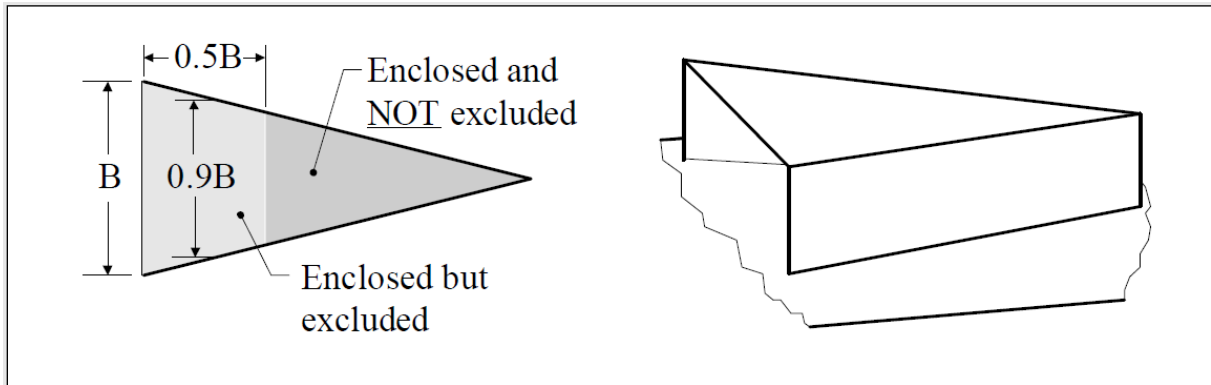
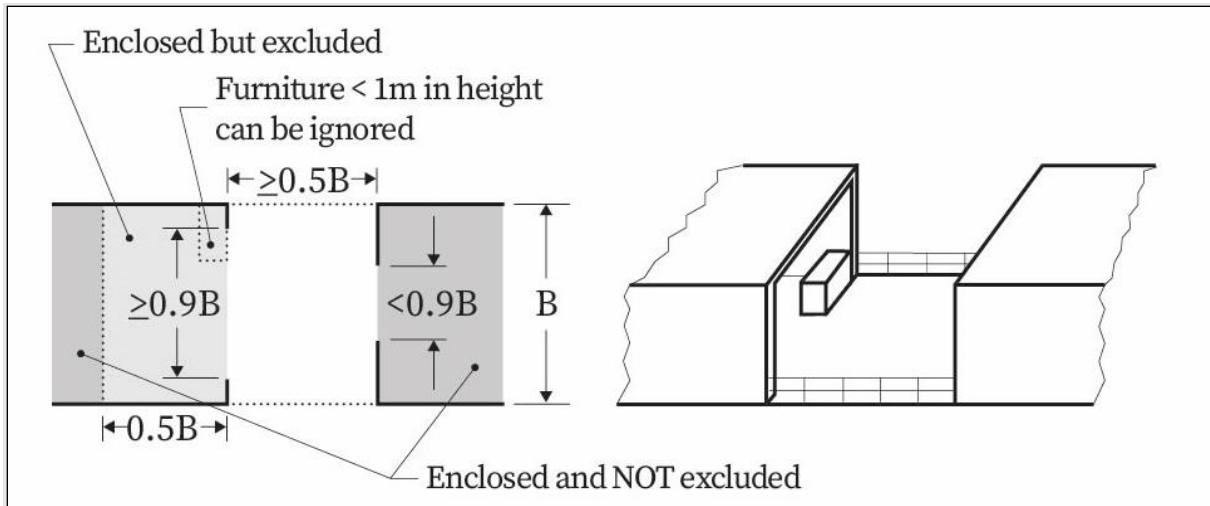
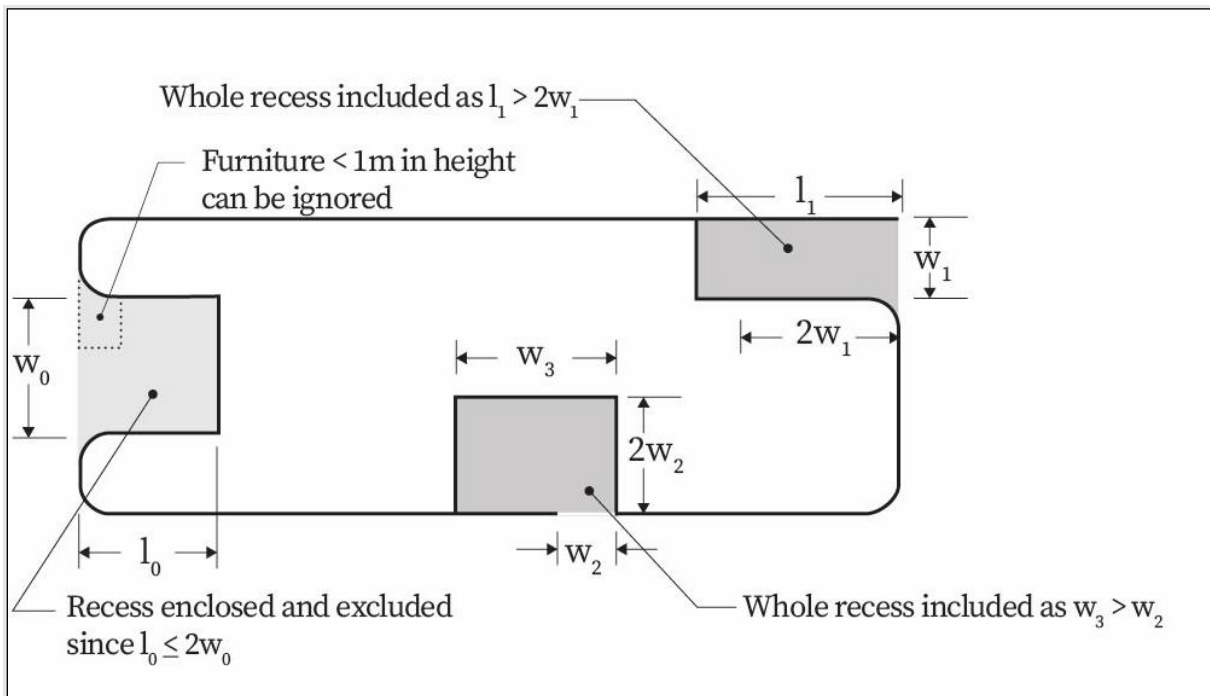


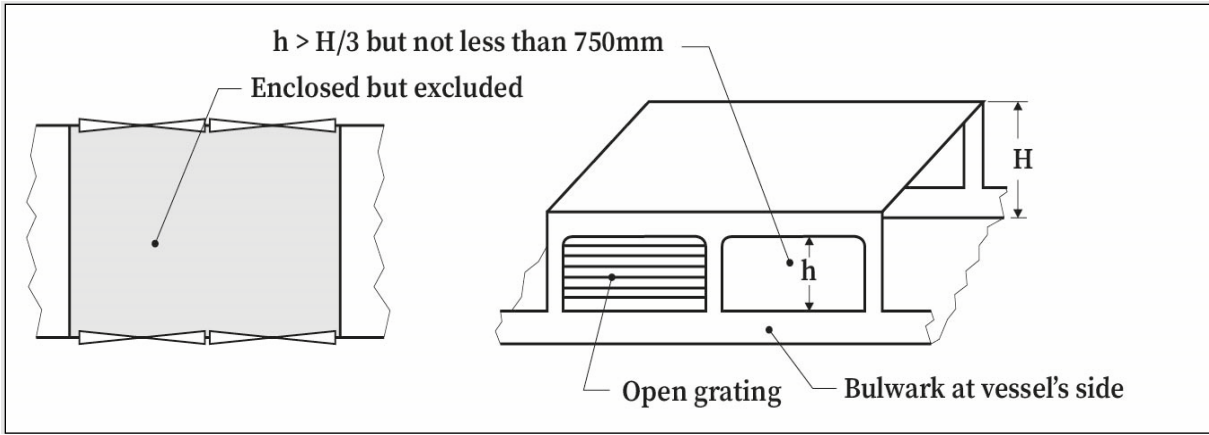
Figure 4



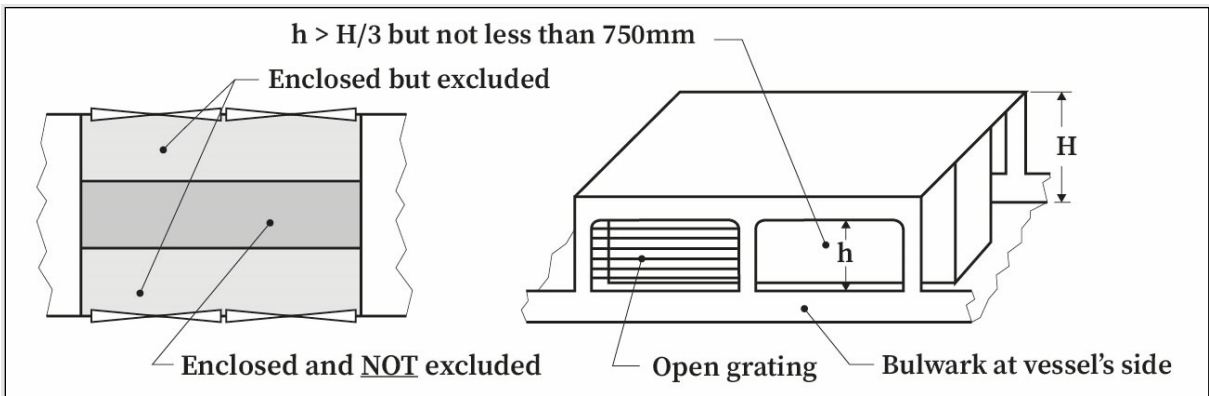
**Figure 5**



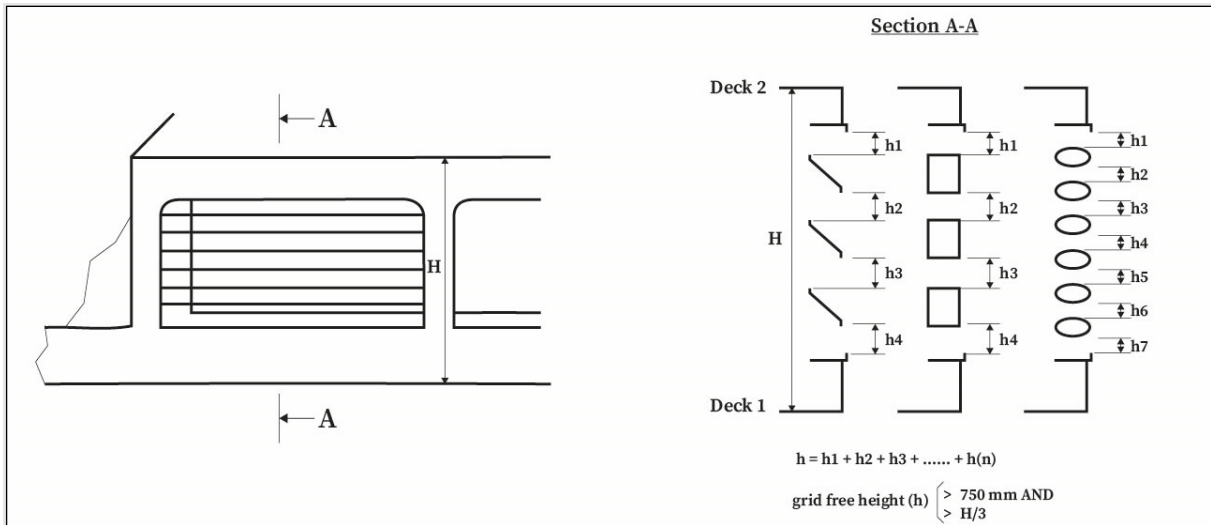
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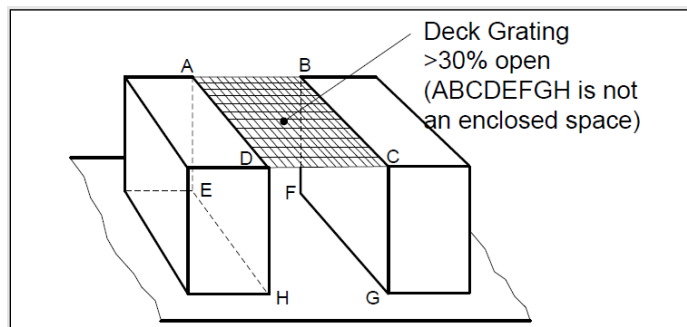
**Figure 7**



**Figure 8**



**Figure 9**



**Figure 10**