

REGULAS SHIPPING PVT LTD

FLEET COMPLIANCE & OPERATIONS DIVISION

PSC FOCUS

THE PSC & CIC REGIME — FOCUS AREAS

Vessel's Preparedness • Manager Awareness • Fleet Readiness

1,255

Ships Detained
(Tokyo MoU, 2025)

3.53%

Tokyo MoU Detention
Rate, 2025

90,168

Deficiencies Recorded
(Tokyo MoU, 2025)

SEP–NOV

2026 Cargo Securing
CIC Window

JUNE 2026 EDITION

Prepared for Vessel's Master ,Owners, Managers & Designated Persons Ashore

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REGULAS
SHIPPING PRIVATE LIMITED

Editor's Briefing

Welcome to the June 2026 edition of PSC FOCUS — Regulas Shipping's recurring intelligence briefing on Port State Control trends, Concentrated Inspection Campaigns, and fleet readiness. This edition consolidates the latest published data from the Tokyo MoU, Paris MoU, and U.S. Coast Guard, translating regulatory statistics into operational priorities for our owners, technical superintendents, and ship masters.

The period under review confirms what frontline experience already tells us: detentions remain concentrated in a narrow band of recurring failure modes — ISM implementation gaps, deferred maintenance, fire safety lapses, and lifesaving appliance defects. None of these are exotic. All of them are preventable with disciplined SMS execution and pre-arrival diligence.

This issue carries particular relevance for the MR product tanker segment and for vessels trading across the Paris and Tokyo MoU regions under St. Kitts & Nevis and Bahamas flag administrations. With the joint Cargo Securing CIC approaching in September 2026, fleet-wide preparation must begin now — not in August.

“The gap between compliant and non-compliant fleets is widening. Preparedness is no longer a periodic exercise — it is a continuous operating discipline.”

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MASTHEAD

Editor-in-Chief: Ravi Kaizen, Fleet Director, Regulas shipping Pvt Ltd | Compiled for: Owners, Technical Managers, DPAs, Masters & Chief Engineers, Regulas Fleet | Coverage: Regulas-managed MR product tanker fleet, dual flag administration | Sources: Tokyo MoU Annual Report 2025, Paris MoU CIC Library, DNV PSC Q1 2026 Review, U.S. Coast Guard PSC data, Black Sea MoU PSCC26 Proceedings.

This briefing is an internal Regulas Shipping publication for fleet preparedness purposes and does not substitute for official MoU guidance, classification society circulars, or flag state instructions. Always verify current requirements against the primary regulatory source before a port call.

SECTION 01 — THE BIG PICTURE

Global PSC Snapshot: 2025/2026 Year in Review

Port State Control activity across the major regimes in 2025 confirms a familiar pattern: high inspection volumes, a stable but stubborn detention rate, and a widening gap between well-managed fleets and chronic under-performers. The Tokyo MoU alone reports record inspection numbers, while DNV's Q1 2026 review shows detentions in the Paris/Tokyo/USCG zones already running ahead of the same period in 2025.

35,546 Tokyo MoU inspections conducted in 2025	19,980 Individual ships inspected (Tokyo MoU, 2025)	1,255 Ships detained under 73 flags (Tokyo MoU, 2025)	3.53% Tokyo MoU detention rate, 2025
90,168 Total deficiencies recorded (Tokyo MoU, 2025)	526 Detentions, Paris+Tokyo+USCG, Q1 2026 alone	64 DNV-classed vessel detentions, Q1 2026 (vs 52, Q1 2025)	83% Detentions on container/bulk/general cargo types

What the Numbers Are Telling Us

Three structural signals stand out in the current data set, each with direct relevance for fleet planning:

1. Rising detentions despite stable rates. DNV recorded 64 detentions among classed vessels in Q1 2026 versus 52 in Q1 2025 — a 23% increase — even as the headline detention percentage has held broadly flat. This points to a growing pool of vessels with persistent, unresolved deficiencies rather than a system-wide deterioration.
2. ISM implementation and equipment maintenance are the two pillars of detention risk. Across Paris MoU, Tokyo MoU, and USCG data alike, deficiency code 15150 (ISM Code implementation) and code 15109 (Maintenance of Ship and Equipment) are the leading detainable categories quarter after quarter. The pattern is structural, not seasonal — it reflects safety management systems that exist on paper but are not consistently lived out in daily routine.
3. The compliance gap is widening, not narrowing. Tokyo MoU's own 2025 data shows under-performing ships nearly doubling year-on-year even as the overall detention rate eased slightly. Enforcement is increasingly concentrated on a shrinking tail of chronic offenders — which is good news for well-run fleets, but raises the stakes for any vessel that drifts into that tail.

EDITOR'S TAKEAWAY

- ▶ A single clean PSC history is now a competitive asset, not just a compliance requirement — it directly lowers your Ship Risk Profile inspection frequency.
- ▶ Detention cost is not limited to off-hire: DNV and industry data put combined daily exposure (charter hire loss, demurrage, port costs, remedial work) at USD 250,000 to over USD 1,000,000 per detention day.

- The fundamentals — ISM execution and maintenance discipline — remain the highest-leverage investment any operator can make in PSC performance.

SECTION 02 — CONCENTRATED INSPECTION CAMPAIGN

The 2026 CIC: Cargo Securing

The Paris and Tokyo MoUs will jointly run their 2026 Concentrated Inspection Campaign on Cargo Securing from 1 September to 30 November 2026. This is the single most consequential near-term PSC event for any vessel trading into European or Asia-Pacific ports during the final quarter of the year, and CIC topics are announced at least six months in advance precisely so that operators have time to prepare — that window is now.

1 SEP Campaign opens — Paris & Tokyo MoU ports	30 NOV Campaign closes (2026)	JOINT Coordinated questionnaire, both regimes
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What PSC Officers Will Verify

During the campaign window, PSCOs will apply a standardised supplementary questionnaire alongside the normal inspection, covering:

- Cargo Securing Manual (CSM) — approval status, currency, and alignment with the vessel's actual securing arrangements
- Condition of lashing equipment — turnbuckles, lashing chains, twist-locks, container fittings (as applicable), wires and associated hardware, checked for wear, corrosion, and certification
- Cargo stowage plans — accuracy against actual loaded condition and consistency with the CSM's permissible stowage/securing arrangements
- Crew competency in securing procedures — officers and ratings must demonstrate familiarity with the CSM and be able to explain securing decisions for the current cargo configuration

Historical Context: How CICs Tend to Play Out

Recent CIC cycles offer a useful benchmark for what a determined campaign produces. The 2025 Ballast Water Management CIC, run jointly by Paris and Tokyo MoU, generated 9,244 PSC inspections, of which 6,930 (74.96%) included the CIC questionnaire. Within that group, 184 ships were detained — a 2.66% detention rate during the campaign — with 30 of those detentions directly attributable to BWM-related deficiencies (a 0.43% CIC-specific detention rate). Tellingly, deficiencies tied to the operation and maintenance of Ballast Water Management Systems were three times higher than in the prior year, underscoring how a CIC surfaces operational gaps that routine inspection can miss.

“A CIC does not just test paperwork. It tests whether the crew can operationally demonstrate the system the manual describes — in real time, under questioning.”

Preparation Priorities for the Fleet

All Regulas -managed vessels should treat the period July–August 2026 as the working window to close gaps ahead of the campaign opening. Recommended actions: **Not applicable to Marisca Tide points 1 to 4**.

1. Confirm the Cargo Securing Manual is the current approved revision and matches the vessel's actual deck and hold fittings — discrepancies between manual and as-fitted arrangements are a leading CIC finding.
2. Conduct a full lashing gear survey: inspect turnbuckles, D-rings, lashing points, and associated hardware for wear, deformation, and corrosion; replace or recondition as needed and retain survey records on file.
3. Brief deck officers and the bosun on CSM content specific to the vessel's current and anticipated cargo/voyage pattern, and rehearse a mock PSCO walk-through with securing-related questioning.
4. Cross-check stowage plan templates against the CSM's permissible configurations before the campaign window, not at the point of loading.

SECTION 03 — DEFICIENCY INTELLIGENCE

Top Detainable Deficiency Categories

Fire safety, life-saving appliances, working and living conditions, and safety of navigation together account for over half of all deficiencies recorded by Tokyo MoU in 2025 — a concentration that has held remarkably stable for several years. What has changed is the trajectory beneath the surface: ISM implementation, maintenance standards, structural/weathertight integrity, and machinery-related categories are all on a multi-year upward trend, even where their absolute ranking hasn't moved.

Deficiency Category	2025 Count	Share / Note	Trend
Fire Safety Measures	18,020	19.9%	RISING
Life-Saving Appliances	11,818	13.1%	STEADY
Working & Living Conditions	9,108	10.1%	RISING
Safety of Navigation	8,936	9.9%	STEADY
ISM Code Implementation (15150)	—	Leading detainable sub-category, all regimes	RISING
Maintenance of Ship & Equipment (15109)	—	Leading Tokyo MoU / USCG category	RISING
Structure, Water/Weathertight Integrity	—	Continuously increasing, multi-year trend	RISING
Emergency Systems & Procedures	—	Continuously increasing, multi-year trend	RISING
Propulsion & Auxiliary Machinery	—	Continuously increasing, multi-year trend	RISING
Certificates & Documentation	—	~15% of inspections (composite estimate)	STEADY

Reading the Table: Four Categories Demand Immediate Attention

- **Fire Safety Measures (19.9% of all deficiencies)** — Fire detection zones in fault or bypass, missing insulation on hot surfaces, fuel leakages, fire pump underperformance, and damaged A60 boundaries remain the most cited engine-room findings.
- **ISM Code Implementation** — increasingly cited not because SMS documentation is absent, but because PSCOs are finding gaps between what the SMS describes and what the crew can demonstrate operationally.
- **Maintenance of Ship & Equipment** — the leading category for Tokyo MoU and USCG specifically; reflects deferred or incomplete planned maintenance rather than catastrophic equipment failure.
- **Structure, Water/Weathertight Conditions and Emergency Systems** — both flagged by Tokyo MoU as showing continuous year-on-year increases, a trend the regime explicitly links to inconsistent onboard maintenance routines.

“Five or more deficiencies on a single inspection dramatically increases detention probability. The threshold is not generous — it rewards consistent housekeeping over last-minute preparation.”

SECTION 04 — REGIONAL INTELLIGENCE

Regime-by-Regime Focus

Operators trading globally are, in effect, subject to several overlapping inspection philosophies at once. Each regime shares the same New Inspection Regime DNA but applies it with different weighting, different databases, and — critically — different legal consequences for repeated non-compliance.

Regime	Coverage	System	2026 Notes
Paris MoU	27 member states (Europe / N. Atlantic)	New Inspection Regime (NIR), THETIS database	Joint 2026 CIC: Cargo Securing (Sep–Nov). EU PSC Directive gives legal force, EMSA oversight, EU port-banning power after repeat detentions.
Tokyo MoU	21 member states (Asia-Pacific)	NIR, APCIS database	Joint 2026 CIC: Cargo Securing (Sep–Nov). Largest inspection volume of any regime (35,546 in 2025). No formal port-banning mechanism, but detention data shared region-wide.
U.S. Coast Guard	Operates independently of MoU structures	Own targeting matrix; Qualship 21 recognition program	Strict, often more rigorous enforcement on ISM, MARPOL, and security items. Concentrated focus on tankers, passenger vessels, and U.S.-flag operations.
Black Sea MoU	Black Sea littoral states	NIR-aligned, coordinated with Paris/Tokyo questionnaires	Completed 2025 CIC on Ballast Water Management (776 detentions tracked region-wide); operates against the backdrop of regional conflict risk.

The Risk Profile Mechanics

Both Paris and Tokyo MoU calculate a Ship Risk Profile from six factors: ship type, ship age (vessels over 12 years carry the highest weighting), flag state performance (White/Grey/Black list standing), Recognized Organization performance, company (ISM DOC holder) fleet performance, and deficiency/detention history over a rolling 36-month period. The resulting profile sets the inspection window:

5–8 mo High Risk inspection window	10–18 mo Standard Risk inspection window	24–36 mo Low Risk inspection window
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A detention in any one Paris or Tokyo MoU member port is immediately visible to every other member authority through THETIS and APCIS respectively — and detention history follows a vessel across regimes, even where the underlying risk-profile weighting differs slightly between Europe and Asia-Pacific. There is no reset button at a regional border.

MANAGER'S NOTE

- ▶ A vessel's risk profile is a trailing 36-month average — a single clean inspection does not erase a recent detention from the calculation.
- ▶ Check flag, RO, and company performance scores in both THETIS (Paris MoU) and APCIS (Tokyo MoU) independently; standing can differ meaningfully between the two regimes depending on trading pattern.
- ▶ USCG enforcement, operating outside the MoU structure entirely, has historically applied a stricter standard to tankers — plan U.S. port calls with that in mind regardless of MoU performance elsewhere.

SECTION 05 — REGISTRY INTELLIGENCE

Flag & Recognized Organization Performance Watch

The Paris MoU White-Grey-Black (WGB) list remains the most-watched flag performance benchmark in the industry, calculated on a rolling three-year inspection and detention record for any flag with at least 30 inspections in that period. The Committee adopted new 2025 performance lists — covering the 2023–2025 inspection and detention record — at its 59th meeting; these took effect 1 July 2026 and remain valid until 6 July 2027, covering 69 flags split 40 White / 19 Grey / 10 Black.

AMENDMENT — JULY 2026: St. Kitts & Nevis (ISKN) remains on the new Paris MoU Black List (Medium Risk category) under the 2025 performance lists effective 1 July 2026. Bahamas (BMA) continues to hold White List standing. Regulas fleet vessels under ISKN should now be treated as heightened-scrutiny for Paris MoU port calls; BMA-flagged tonnage retains its lower-priority inspection weighting.

White List	Grey List	Black List
Commendable performance — lowest inspection priority weighting	Intermediate performance — standard scrutiny	Poor performance — high/very high risk weighting

Why This Matters for Dual-Flag Operations

A flag's standing can differ meaningfully between regimes, since each is built from inspection activity within its own geographic exposure. A flag with strong European performance may show a weaker profile in Asia-Pacific simply because a different mix of vessels trades there, and vice versa. Operators running vessels under more than one flag — or trading the same vessel across multiple regimes — should check standing in both the Paris MoU WGB list and the Tokyo MoU equivalent independently rather than assuming one score applies globally.

This has direct relevance for Regulas Shipping's dual-administration arrangement across its tanker fleet: vessels' DOCs sit under both St. Kitts & Nevis (ISKN) and Bahamas Maritime Authority (BMA). Each flag's standing should be tracked separately in THETIS (Paris MoU) and APCIS (Tokyo MoU), and the better-performing flag's documentation discipline should be the fleet-wide standard, not the lower one.

“A flag defines jurisdiction. Management defines condition. The physical state of a ship — and its detention risk — is a management outcome, not a registry inevitability.”

Recognized Organization (RO) Performance

Classification societies acting on a flag's behalf are scored using the same excess-factor methodology applied to flags, with a minimum of 60 inspections in the three-year window required for inclusion. RO performance should be reviewed alongside flag performance during annual DOC/SMC audit preparation — a high-performing flag paired with a weaker-performing RO does not fully de-risk a vessel's profile.

ACTION FOR FLEET COMPLIANCE

- ▶ Pull current WGB standing for ISKN and BMA from the Paris MoU publication and cross-check against the latest Tokyo MoU equivalent before the next scheduled PSC-exposed port call.
- ▶ Confirm the vessel's classification society's RO performance category has not changed at the most recent Paris MoU Committee review.
- ▶ Where a flag sits on the Grey List, treat every port call in that regime as a heightened-scrutiny event regardless of the vessel's individual deficiency history.

SECTION 06 — SEGMENT SPOTLIGHT

MR Product Tankers: Targeting Realities

Tankers — chemical, oil, and gas carriers alike — sit in the elevated-risk weighting tier under the New Inspection Regime's ship-type factor, alongside bulk carriers and vessels carrying hazardous cargo. For MR product tankers, this means the ship-type component of the risk profile starts from a less forgiving baseline than a general dry cargo vessel of comparable age and flag standing.

ELEVATED Ship-type risk weighting for tankers under NIR	12 yrs+ Vessel age threshold carrying highest NIR weighting
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USCG: A Different Bar for Tankers

The U.S. Coast Guard, operating outside the MoU framework entirely, applies a concentrated enforcement focus specifically to tankers, passenger vessels, and U.S.-flag operations. Vessels with U.S. trade exposure should not assume that strong Paris or Tokyo MoU performance translates directly into USCG comfort — the targeting criteria, documentation expectations, and detention thresholds are calculated independently.

Recurring Tanker-Specific Findings

Beyond the universal fire safety and ISM categories, PSC data and class society case files point to a consistent set of tanker-specific findings that warrant standing attention on MR product tankers:

- Cargo and ballast system valve schedules — incomplete familiarisation, mislabelled valves, or schedules that do not match the vessel's actual piping arrangement (directly relevant given the fleet's current QCV familiarisation programme).
- Oil Record Book entries inconsistent with actual vessel operations, and overdue OWS (Oily Water Separator) alarm testing — a leading MARPOL Annex I finding.
- Inert gas system and cargo tank atmosphere control records, where gaps between procedure and demonstrated crew competency are a recurring PSCO focus.
- Engine room housekeeping and fire safety integration — clean bilges, functioning ventilation dampers, and an intact fire detection system remain the highest-frequency machinery-space findings fleet-wide.
- Mooring and pilot transfer arrangements — Tokyo MoU issued a specific 2025 safety bulletin on proper maintenance and rigging of pilot transfer arrangements, a topic that continues to surface in inspections.

RELEVANCE TO THE REGULAS TANKER FLEET

- ▶ The elevated ship-type weighting under NIR means even a single moderate deficiency on a tanker carries more risk-profile consequence than it would for a lower-risk vessel type.
- ▶ An active QCV valve familiarisation programme directly addresses one of the most consistently cited tanker-specific finding categories.
- ▶ Any detention or significant deficiency finding feeds a vessel's 36-month rolling risk profile — reinforcing the case for zero-deficiency performance at every inspection across the fleet.

SECTION 07 — OPERATIONAL TOOL

Owner & Manager Preparedness Checklist

The following consolidated checklist translates the trends covered in this edition into a standing fleet-wide discipline. It is designed to be reviewed at the indicated frequency rather than only in the days before a known inspection — PSC targeting can apply to any port call, and routine readiness is the only reliable defence.

Preparedness Item	Frequency	Owner
All statutory certificates valid — SOLAS, MARPOL, Load Line, MLC, ISPS, BWM	Every port call	Master / DPA
ISM SMC and Company DOC current with endorsements	Quarterly review	DPA
STCW CoCs match position; BST refreshers current	Crew change	Master / Manning
Minimum Safe Manning Document on board, crew meets/exceeds requirement	Every port call	Master
Cargo Securing Manual matches as-fitted arrangement (2026 CIC priority)	Before Sep 2026	Chief Officer / Superintendent
Lashing gear survey — turnbuckles, D-rings, fittings checked for wear/corrosion	Before Sep 2026	Chief Officer
Fire detection zones tested, no bypassed alarms; A60 boundaries intact	Monthly	Chief Officer / C/E
Fire pump delivers required pressure; emergency fire pump tested	Monthly drill cycle	Chief Engineer
Lifeboat release gear, davits, fall ropes inspected; EPIRBs/immersion suits current	Monthly	2nd Officer
Oil Record Book entries reconciled with actual operations; OWS alarm test current	Each voyage	Chief Engineer
QCV / cargo & ballast valve schedule familiarisation refreshed with crew	Crew change	Chief Officer
Engine room housekeeping — bilges clean, ventilation dampers operative	Weekly	Chief Engineer
Flag (ISKN / BMA) and RO standing checked in THETIS / APCIS	Quarterly	Fleet Compliance
Vessel's 36-month deficiency/detention history reviewed against risk profile	Quarterly	Fleet Director / DPA
Pilot transfer arrangement rigging and maintenance verified	Each port call	Chief Officer

This checklist should be read alongside, not as a replacement for, each vessel's existing pre-arrival checklist under the SMS, and should be incorporated into the next scheduled internal audit cycle across the fleet.

SECTION 08 — LESSONS LEARNED

Case File: Lessons from a Detention

This edition's case file draws on the fleet's own recent experience. In May 2026, a Regulas-managed MR product tanker experienced a BMS (Bridge Management System) and telegraph malfunction during an anchorage period at Singapore, leading to pilot cancellation and a subsequent ISM vessel inspection. The follow-up PSC detention identified a 13-deficiency profile, addressed through formal Non-Conformity Reports under template FO/C/017, a root cause analysis.

What the Case Confirms About the Broader Trend

This case sits squarely within the patterns this edition documents at the global level:

1. Equipment that fails during a routine evolution (in this case, a navigation/communication system ahead of pilotage) generates a cascade — pilot cancellation, increased PSCO attention, and a wider-than-expected deficiency list once boarded. This mirrors the global finding that 5+ deficiencies on a single inspection sharply raises detention probability.
2. A 13-deficiency detention is consistent with the structural pattern of ISM and maintenance-category findings clustering together: a single equipment malfunction is rarely isolated once a PSCO begins a full walk-through.
3. The root cause analysis and fleet circular response is the correct institutional reaction — translating a single-vessel event into fleet-wide preventive action is exactly what closes the gap between documented SMS and demonstrated practice that PSC data shows widening industry-wide.

“Every detention is a single data point that becomes part of a 36-month trailing average. The response to one incident is also, in effect, a defence of the next three years of inspections.”

Follow-Through Actions in Progress

- 13-deficiency NCR sheets completed under template FO/C/017, with corrective actions tracked to closure.
- Fleet circular issued to standardise lessons learned across the fleet, not just the affected vessel.
- QCV crew familiarisation training rolled out fleet-wide, addressing valve schedule competency identified as a contributing gap.
- Master's Briefing document issued to reinforce pre-arrival discipline ahead of each vessel's next scheduled inspection window.

WHY THIS CASE FILE MATTERS BEYOND ONE VESSEL

- ▶ The same root-cause categories — bridge/navigation equipment reliability and crew familiarisation with vessel-specific systems — appear repeatedly in Tokyo MoU's own multi-year trend data for emergency systems and machinery deficiencies.
- ▶ Closing this case strengthens the fleet's 36-month rolling risk profile only if the corrective actions are demonstrably embedded — not just documented — at the next inspection.

- This is the model going forward: every detention or significant deficiency finding should generate a fleet circular, not just a single-vessel NCR.

SECTION 09 — FORWARD LOOK

Closing this edition, five developments deserve standing attention on the Regulas fleet compliance calendar between now and the end of 2026:

1. Cargo Securing CIC opens 1 September. The joint Paris/Tokyo questionnaire becomes live for any port call in either region. Vessels without a completed pre-campaign CSM and lashing gear review will face it cold.
2. Q1 2026 detention increase needs watching for confirmation. DNV's 23% year-on-year rise in classed-vessel detentions (Q1 2026 vs Q1 2025) is one quarter of data — the Q2 and Q3 figures, expected through DNV's regular reporting cycle, will show whether this is a trend or noise.
3. China's revised Maritime Code (effective 1 May 2026) introduces formal conditions for electronic record acceptance during PSC inspections — relevant for any planned calls at Shanghai, Ningbo, Guangzhou, or Tianjin given China MSA's already heightened enforcement intensity.
4. Flag and RO performance reviews have now landed. The new Paris MoU 2025 WGB list took effect 1 July 2026: ISKN remains Black List (Medium Risk), BMA remains White List. Fleet DPAs should update THETIS/APCIS tracking and heightened-scrutiny planning for ISKN port calls accordingly — see the Amendment note in Section 05.
5. Security-related PSC scope is expanding. Industry tracking already shows a 2026 trend toward formal entry of security into PSC scope — SSP implementation, SSO duties, drills, and access control records — worth monitoring even though it sits outside the headline Cargo Securing CIC.

“None of the trends in this edition reward improvisation. Every one of them rewards a fleet that treats PSC readiness as a continuous discipline rather than a pre-arrival scramble.”

PSC FOCUS

Owner & Manager Awareness Briefing



Fleet Compliance & Operations Division

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