

# Document 1 - Summary of the changes in legislation

## Representative Person Roles

### 2004 - Present :

Until now, the sole role of a Representative Person, which was introduced in 2004, has been to provide a Jersey address to which legal papers can be deemed to have been served on a vessel in the event that the Ships Registry were unable to contact the owner.

This was identical to the Representative Person role in the UK and was designed to satisfy the UNCLOS\* requirement for a "Genuine Link" between the vessel owner and the flag state, in particular to enable the enforcement of international shipping regulations. This principle is shown as RED in the diagram (right).



### NEW Additional Role from June 2025 onwards:

The legislation passed in December 2024 now creates a significant additional role. Effective from June 2025:

*A representative person appointed in respect of a ship must –*

(a) *hold information that identifies the owner of the ship or of any share in the ship and is evidence of their ownership of the ship or of their share in the ship; and*

(b) *produce that information to the Registrar within 7 days of a request by the Registrar for that information.*



In addition, if we, as Representative Person, fail to provide these details, or the information is inaccurate, we may be fined up to £10,000 and our Company Directors could receive a criminal record.

The information we are required to hold depends on whether the vessel is owned by individuals, simple companies or complex multi-level companies. This differs from standard "compliance" in that we are expected to hold this information for at least the duration of our representation. This has necessitated bespoke data storage and collection systems. We will need to collect and verify information on all vessel owners and this information will need to be confirmed annually.

Despite using the same name (Representative Person), the legislation obliges us to reach new agreements with all vessel owners and we have decided to offer a "bolt-on" upgrade to existing agreements, to address the new legislation. We will attach new terms and conditions to our data collection form, which we will send to you in the coming weeks.

As the complexity varies depending on the ownership structure and the jurisdictions where the owners are based, we have decided to offer upgrade packages tailored to each scenario. We hope to welcome vessel owners into the new scheme and in cases where this is not possible, we will try and propose other solutions.

\* UNCLOS - The United Nations Convention on the Law of the Sea (UNCLOS), also called the Law of the Sea Convention or the Law of the Sea Treaty, is an international treaty that establishes a legal framework for all marine and maritime activities.