THE GOVERNMENT
OF THE GRAND DUCHY OF LUXEMBOURG
Ministry of the Economy

Maritime Administration

Luxembourg, 13th April 2026

Circular CAM 03/2026 (replacing CAM 02/2021)

O/Ref.: ER/116873

Subject: Rules on Acceptance of Ship Insurance by the Luxembourg Maritime Administration (CAM)

To: All accredited shipping managers, shipowners, ship-operators and interested insurance companies and brokers.

Purpose: This circular letter serves to inform shipping managers, shipowners, ship operators, and relevant insurance companies and brokers about the acceptance criteria for ship insurance by CAM. It outlines the framework within which ship insurance is accepted by CAM, ensuring compliance with both international and national regulations.

1. Legal context

1.1. Definitions

For the purpose of these rules:

"relevant international convention": means one or several of the following conventions:
- The International Convention on Civil Liability for Oil Pollution Damage, 1992 (1992 CLC)
- The International Convention on Civil Liability for Bunker Oil Pollution Damage, 2001 (2001 Bunkers Convention)
- The Nairobi International Convention on the Removal of Wrecks, 2007 (2007 Nairobi WRC)
- The Maritime Labour Convention, 2006 (2006 MLC)

"Insurance Certificate" or "blue cards" means the evidence of insurance of financial security issued by the insurer or financial security provider or P&I Club.

"Convention Certificate of Insurance" means the certificate issued or certified by the Commissariat aux affaires maritimes (CAM) confirming that the insurance or other financial security required by the relevant convention is in force.

1.2. International law

The relevant international convention mandates compulsory insurance or financial security against risks associated with vessel operations.

Vessels registered under Luxembourg flag must comply with the relevant international convention necessitating shipowners to secure appropriate insurance or financial security.

International organizations have emphasized the need for Flag States' administrations to diligently assess insurers, financial security providers and P&I clubs' rules and the insurance or financial security provided to ensure adequate and effective coverage.

1.3. Luxembourg law

In Luxembourg, the Commissariat aux assurances (CAA) is the authority responsible for the supervision of the insurance sector. The CAA published on its website a list of non-life insurers which are authorized to conduct insurance business in the territory of Luxembourg.

Furthermore, article 2.0.0-3[1] of Luxembourg maritime act 1990 adds three main conditions for accepting any insurance certificate:

a. Professional experience

The insurer, P&I club or the financial security provider must demonstrate sufficient professional experience to ensure adequate and effective response in case of incident.

b. Issuance of the insurance or financial security by EU/EEA companies

Consistent with the principle of treating EEA States equivalently to the EU States, CAM accepts insurance certificates when insurance is issued by a company with registered office in an EEA/EU State.

If the insurance certificate does not *prima facie* demonstrate that the insurance is provided by the EU/EEA registered office of the company, evidence must be provided that the insurance is *de facto* issued by a company based in an EU/EEA country.

---

[1] Every person or legal entity must be in possession of civil liability insurance (Protection and Indemnity Insurance) issued by an insurance company with proper professional experience of the requisite kind and having its registered office in a Member State of the EU. This insurance must provide cover for all damage, which may be caused by the ship for which registration is requested, or by her cargo.

All ships carrying more than 2000 tons of oil in bulk as cargo must take out insurance or some other financial guarantee, such as a bank guarantee or a certificate issued by an international compensation fund, for a fixed sum in accordance with the limitation of liability specified in the International Convention on Civil Liability for Oil Pollution Damage of 29th November 1969.

A certificate attesting that the insurance or financial guarantee is legally valid will be issued by the Commissioner of Maritime Affairs. The certificate will be in accordance with the specimen used in the Civil Liability Convention. The conditions of issue and validity of the certificate shall be established as necessary by Grand-Ducal Regulation.

The certificate must be annexed to the ship's log

c. Coverage

The insurance coverage will be analysed on a case-by-case basis. The insurance company should be adequately solvent and sufficiently reinsured.

2. Procedure

Without prejudice of any procedure that insurers may have to follow with regards to their accreditation by the CAA, the following procedure should be applied.

2.1. Acceptation of IG P&I Clubs

CAM automatically accepts insurance issued by or on behalf of an IG P&I Club provided that insurance is provided by the EU/EEA offices of the P&I Club.

As for IG P&I Clubs established and with registered office in Luxembourg, insurance certificates issued by their non-EU/EEA branches are accepted as long as the insurance is provided by the parent company under the supervision of the CAA.

2.2. Acceptance of other insurers, financial security providers or P&I clubs

Request for recognition of blue cards issued by insurers, financial security providers or P&I clubs other than IG P&I clubs must be submitted to cam@cam.etat.lu in a timely manner to allow verification.

CAM does not issue general acceptance letters to insurers, financial security providers and P&I clubs.

CAM's analysis is based on the guidelines for accepting insurance certificates and insurance companies, financial security providers, and Protection and Indemnity Clubs (LEG.1/Circ 16, 20 June 2024).

COMMISSARIAT AUX AFFAIRES MARITIMES * G.-D. DE LUXEMBOURG *

(s) André HANSEN
Government Commissioner
for maritime affairs