

Merchant Marine Circular

Panama Maritime Authority
General Directorate of Merchant Marine
Control and Compliance Department

MERCHANT MARINE CIRCULAR MMC-195

- To:** Ship-owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates and Recognized Organizations (RO).
- Subject:** Long Range Identification and Tracking of ships (LRIT)
- Reference:** Law No. 7 of October 27, 1977.
Law 57 of August 6, 2008.
Resolution MSC.202(81) of May 19, 2006 adopted by Resolution No. 106-OMI-06-DGMM of November 26, 2007.
Resolution MSC.263(84) adopted on 16 May 2008 MSC.1/Circ.1295 of December 8, 2008.
Resolution J.D. No. 063-2022 of November 17, 2022.
Resolution No. 106-077-DGMM of August 9, 2023.
MSC.1/Circ.1307/Rev.1 of November 28, 2022.
MMC-155 – Automatic identification System (AIS).

This Merchant Marine Circular supersedes **MMC-197**, **MMC-249** and **MMC-400**.

1. PURPOSE:

The purpose of this Merchant Marine Circular is providing a revised instructions on implementing, maintenance and compliance with the requirements to the Long-Range Identification and Tracking of ships (LRIT) on board the Panamanian flagged vessels, as required by Regulation 19-1 of Chapter V of the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS).

2. SCOPE:

This Merchant Marine Circular applies to all Panamanian flagged vessels engaged on international voyages upward 300 GRT and described in paragraph 4.1.



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3. BACKGROUND:

The Maritime Safety Committee (MSC) of the International Maritime Organization (IMO) adopted Resolution MSC.202(81) on May 19, 2006 amending Chapter V of the International Convention for the Safety of Life at Sea 1974 (SOLAS) Regulation V/19-1 introducing mandatory position reporting obligations, called Long-Range Identification and Tracking system for ships (LRIT).

- The amendment came into force on January 1, 2008, with compliance required by December 31, 2008.
- The LRIT system is a satellite-based system that tracks ships in real-time.
- The LRIT information ships are required to transmit include: the ship's identity, location and date/time of the position at 6-hour intervals.
- All Panamanian flagged vessels under SOLAS V/19-1 regulation must comply with LRIT requirements.

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4.1 APPLICABILITY:

SOLAS V/19-1 applies to the following types of Panamanian flagged vessels, engaged on international voyages:

1. All passenger ships, including High Speed passenger craft,
2. Cargo ships, including High Speed craft of **300** gross tonnage and above,



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3. Mobile Offshore Drilling Units (MODU) that are propelled by mechanical means.
4. Offshore Support Vessels, Special Purpose Ships and Mobile Offshore Units (MOU) of 300 gross tonnage and above that are propelled by mechanical means.

4.1.1 Panamanian-flagged fishing vessel and/or engaged in fishing-related activities fitted with the Long-Range Identification and Tracking System (LRIT) equipment must perform the Conformance Test Report and report by the LRIT.

4.2 Compliance Dates.

4.2.1 In accordance with SOLAS Chapter V, Regulation 19.1, and IMO Circular MSC.1/Circ.1307, all ships, whether constructed before or after 31 December 2008, are required to comply with the Long-Range Identification and Tracking (LRIT) system when the vessel is placed into service.

4.2.2 Panamanian flagged vessels must comply with LRIT regulations and be fitted with a terminal that is capable to transmit automatically the information specified in the paragraph 4.3.1.

4.2.3 Regardless of the construction date, vessels fitted with an automatic identification system (AIS), as defined in SOLAS V/19.2.4, and operated exclusively within sea area A1, as defined in SOLAS IV/2.1.12, **are not** required to comply with the provisions of SOLAS V/19-1.

4.3 Shipborne LRIT Equipment Testing.

4.3.1 Shipborne LRIT equipment must be capable of being configured to transmit the following minimum information automatically, at reporting intervals every 6 hours, to the LRIT Data Center designated by the Flag Administration:

- The identity of the ship (IMO Number and Name)
- The position of the ship (Latitude and Longitude), and
- The date and time of the position reported.

4.3.2 Shipowners may use any equipment to transmit LRIT information provided that the onboard equipment complies with the requirements of SOLAS Regulations V/19-1.6, V/19-1.7 and IMO MSC.1/Circ. 1307/Rev.1.



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4.3.3 The Panama Maritime Authority (AMP), by Resolution No. 106-38-DGMM issued on September 9, 2008, adopts Circular MSC.1/Circ.1257 of June 5, 2008, amended by Circular MSC.1/Circ.1307/Rev.1 of November 28, 2022 as the relevant standard (Guidance on the Survey and Certification of Compliance of Ships with the Requirement to Transmit LRIT Information).

4.3.4 This Administrations reminds all the Shipowners may operate LRIT shipborne equipment using a recognized Communication Service Providers (CSP) by the International Mobile Satellite Organization (IMSO).

4.3.5 Vessels registered in Panama are equipped with LRIT compliant Inmarsat-C equipment, shall ensure that the Long-Range Identification and Tracking Equipment (LRIT) and the Automatic Identification System (AIS) maintain a permanent and adequate operation, avoiding by all possible means that they stop transmitting information on the identity and position of the vessel, according to Resolution No. 106-048-DGMM dated August 19, 2021.

4.3.6 Shipborne equipment used for LRIT shall, after passing a Conformance Test conducted by the authorized ASP, be considered as an approved type in accordance with SOLAS V/19-1, MSC.263(84) of 16 May 2008 and MSC.1/Circ.1296 of December 8, 2008. There will be a charge by the testing ASP directly to ship owners for the Conformance Test and LRIT Conformance Certificate.

4.4 Panama LRIT National Data Centre (NDC).

4.4.1 The Panama Maritime Authority has established a fully functional National Data Centre which is operated on its behalf by Polestar (www.polestarglobal.com) who is also authorized as the Panama Recognized Application Service Provider (Recognized ASP) to undertake shipborne equipment testing and the issuance of a Conformance Test Report (CTR).

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4.4.2 All applicable Panamanian registered vessels will be integrated into the Panama LRIT Data Centre and subject to a satisfactory conformance test of the shipborne LRIT equipment.



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4.5 LRIT Conformance Test Result.

4.5.1 This Administration urges all owners/operators that once the vessel has been registered with Panama to ensure that the LRIT test is performed prior to the radio surveys.

4.5.2 The LRIT conformance test has been designed to demonstrate compliance of shipborne terminal with the functional requirements of the provisions of SOLAS V/19-1. The result is issued by an Authorized Testing Provider (ASP).

4.5.3 LRIT conformance test is required for all new and existing installations of shipborne LRIT equipment upon vessel's registration under Panamanian flag and thereafter annually on or before the anniversary date of the conformance test.

4.5.4 An LRIT conformance test can take approximately 48 hours and is conducted remotely and preferably while the vessel is at sea. It's recommended to test transceivers well before radio surveys to ensure there's enough time for the test.

4.5.5 On successful completion of the LRIT test, the owner/operator must obtain a Conformance Test Report (CTR) as proof of compliance. LRIT Conformance Test Report is issued by the Authorized Testing Provider that conducted the test on behalf of Panama Maritime Authority.

4.6 LRIT Conformance Test Report (CTR).

4.6.1 The CTR is the "Conformance Test Report" and should not be mistaken for the conformance test results. **Recognized Organizations (ROs) shall not to issue a Full Term Safety Equipment Certificate on the basis of the conformance test results.**

4.6.2 The CTR is proof of compliance with LRIT regulations and is required for radio surveys and inspections. The ship operator must keep the CTR on board.

4.7 Conformance Test validity and amendments

4.7.1 Starting July 1st, 2023, all Conformance Test Reports (CTR) issued on behalf of the Republic of Panama will be issued as electronic documents with electronic signature and QR Code. The Panama Maritime Authority will not accept conformance tests carried out under another registry.



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4.7.2 Starting January 1st, 2024, all Conformance Test Report will be issued with validity not exceeding twelve (12) months from the conformance test completion date.

4.7.3 In case of changes in vessel name, ownership, Maritime Mobile Service Identity, Distinctive Number or Letters, Gross Tonnage, or Ship Areas where the vessel is certified to operate will not require a new Conformance Test but will require to obtain an amended Conformance Test Report (CTR) under cost. An amended Conformance Test Report does not extend its validity period.

4.7.4 For the Annual Conformance Test, the following scenarios apply:

1. Vessels that have completed the conformance test before December 2018, must complete the test before the end of September 2023.
2. Vessels that have completed the conformance test between January 1, 2019 and December 31, 2021, must complete the test before the end of November 2023.
3. Vessels that have completed the conformance test after January 1, 2022, must complete the test before December 31, 2023.

4.7.5 The annual conformance test shall be conducted annually based on the anniversary date of the last conformance test.

4.7.6 All Conformance Test shall be conducted directly by Consortium Maritime Intelligence Group 2022, as Recognized ASP on behalf of the Panama Maritime Authority.

4.7.7 For information on how to request a Conformance Test and/or a Conformance Test Report, please refer to <https://ondemand.polestarglobal.com/?page=login>

4.8 Amendments in the shipborne equipment.

4.8.1 The shipborne equipment is required to undergo a new Conformance Test and new Conformance Test Report in these cases:

1. All new installation or changes to LRIT shipborne equipment;
2. All existing LRIT equipment at the time of change of flag
3. Owner changes
4. If the onboard LRIT equipment ceases to operate;
5. When the recognized ASP has notified the Administration that the onboard equipment is not operating within the parameters of the conformance test report and/or in accordance with the LRIT performance standards;



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6. If the vessel has changed flag or has been re-registered under the Panamanian registry.
7. If the vessel wishes to operate outside the maritime area indicated in the conformance test report; and
8. At twelve (12) month intervals, on or before the anniversary date of the conformance test.

4.8.2 In those cases when the vessel changes (Ship Name, Ownership, Maritime Mobile Service Identity, Distinctive Number or Letters, Gross Tonnage, or Ship Areas where the ship is certified to operate) will not require a new Conformance Test but will require obtaining an amended Conformance Test Report which will have cost. In those cases, the owner/operator should send request for amendment Conformance Test Report (CRT) to the authorized ASP at the following email: support@polestarglobal.com.

4.9 Change of Flag.

4.9.1 To ensure compliance with the provisions of SOLAS Regulation V/19-1, the vessel's LRIT equipment must be integrated into the Panama National Data Center (NDC), so it is essential that the vessel's name, flag, LRIT equipment identifiers and serial numbers are completed in a timely manner to achieve or maintain compliance with the requirements to transmit LRIT information at the time of the flag change.

4.9.2 Owners and/or operators intending to transfer a vessel with LRIT application to the Panama Registry must provide the Administration with the following information upon completion of the registration process:

1. the vessel's IMO number,
2. the current flag,
3. the proposed date of transfer, and
4. confirmation of the scheduled conformance test with a testing authorized service provider (ASP).

4.9.3 An LRIT conformance test can take approximately 48 hours and is conducted remotely and preferably while the vessel is at sea. To expedite the process, owners may schedule a conformance test, with the authorized testing service provider (ASP), prior to the radio survey.



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4.9.4 The new recognized mobile satellite service vessel ground station number issued by the Panama Administration after the change of flag must be provided to the Testing ASP so that the ASP can issue a new Conformance Test Report on behalf of Panama Maritime Authority.

4.9.5 In the event that the vessel does not have the LRIT equipment and/or capability and/or has not performed a conformance test, and considering that additional time may be required for the installation of new equipment, configuration of existing equipment and/or scheduling of a compliance test, owner/operators shall apply for an authorization letter through E-Segumar platform in the following link: <https://certificates.amp.gob.pa/certificates/> to allow them the necessary time to complete these tasks. The installation and commissioning of new LRIT equipment must be completed before a full-term Safety Equipment Certificate may be issued.

4.10 Switched off LRIT equipment.

4.10.1 This Administration remains all owner/operators that switched off LRIT (Long Range Identification and Tracking) equipment requires authorization from the ship's Flag Administration and is only permitted in specific circumstances. If the equipment is switched off, the ship's master must inform this Flag Administration without delay in the following email: monitoringfleet@amp.gob.pa. Additionally, the period during which the LRIT equipment was inactive must be documented in the vessel's Official Log Book.

4.10.2 A vessel can only switch off its Long-Range Identification and Tracking (LRIT) equipment in certain circumstances and with permission from its Flag Administration.

1. vessel is in dry dock for repairs, modifications or conversions,
2. vessel is moored for a period exceeding 7 days,
3. vessel in laid-up condition,
4. vessel is without power supply for more than 12 hours.
5. vessel is operating in jurisdictional waters
6. any other will be evaluated.

4.10.3 The LRIT equipment must not be switched off either before entry into an area of risk or during transit on such area. The LRIT System and the SSAS onboard has been correctly set up and working properly in order to accomplish the Best Management Practices (BMP) and the Internationally Recommended Transit Corridor (IRTC) established in the Merchant Marine Circular (MMC) 230.



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4.10.4 According to Resolution J.D. No. 063-2022 dated November 17, 2022 all Panamanian flagged vessels that deliberately deactivate the Long-Range Identification and Tracking Equipment (LRIT) and the Automatic Identification System (AIS) will be sanctioned for noncompliance with the Panama Maritime Authority Regulations.

4.11 Authorization Conformance Test.

4.11.1 Starting from April 10th, 2025, all users will be able to apply through the E-Segumar platform for the authorization letter related to conformance test report (CTR) at the following link: <https://certificates.amp.gob.pa/certificates/>

4.11.2 These authorizations are free of charge and will be valid for 30 days which will be processed through the main office in Panama.

- LRIT Process for New Construction
- LRIT Process for Change of Flag
- Vessel operating in Jurisdictional waters
- Laid up LRIT reporting
- Postpone LRIT Conformance Test Report (only for ships that already have an issued CTR)

4.11.3 Starting from May 1st, 2025, all users will be able to apply through the E-Segumar platform for the authorization letter related to malfunctioning of the LRIT or AIS at the following link: <https://certificates.amp.gob.pa/certificates/>

- LRIT Malfunction
- AIS Malfunction
- LRIT Equipment Replacement

4.12 Survey and Certification - Instructions to the Recognized Organizations (RO).

4.12.1 The Recognized Organization shall ensure that vessel/units have a valid **Conformance Test Report (CTR)** on board during applicable surveys.

4.12.2 If the ship is undergoing radio inspection and does not have the Conformance Test Report (CTR) on board, but there is evidence that the Recognized ASP has initiated the test, the Recognized Organization may issue a Conditional Safety Equipment Certificate valid for **one (1) months**, without prior authorization from the Segumar Office, however copy of the conditional certificate shall be send immediately to conditionals@segumar.com



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4.12.3 The Recognized Organization will not be able to issue a fully valid Safety Equipment Certificate if the vessel does not have a valid Conformance Test Report on board, or in cases where the vessel is not within the NDC.

4.12.4 If the vessel has the radio inspection report and has already completed the conformance test, but the equipment on board does not meet the LRIT performance standards, authorization may be granted to the Recognized Organization to issue a Conditional Safety Equipment Certificate valid for three months, which will allow the ship more time to obtain the new equipment.

4.12.5 For cargo ships of gross tonnage of 300 and above but of less than 500, compliance with the LRIT requirements should be verified by confirming that a valid Conformance Test Report is on board at annual surveys.

4.12.6 A shipowner intending to install a dedicated terminal on board for LRIT purposes needs to do well enough in advance of the vessel first Safety Radio Survey to avoid the circumstance where the LRIT CTR has not yet been delivered to the ship in time for the first Survey.

4.13 Exemptions and Equivalent arrangements.

4.13.1 Panamanian vessels that are operating exclusively in a GMDSS A1 Sea area and are fitted with an Automatic Identification System (AIS) as defined in SOLAS Chapter V, Regulation 19.2.4, and operated exclusively within sea area A1 (as defined in revised SOLAS Chapter IV, Regulation 2.1.15), are not required to comply with the provisions of SOLAS Chapter V, Regulation 19-1. Therefore, exemption certification from the requirement to comply with SOLAS Chapter V, Regulation 19-1 is not required.

4.13.2 In those cases where the vessel maintains a CTR to operate at A2+A3 and for some reason the vessel is operating in domestic waters for a certain period of time, it must inform the Administration to conformancetest@amp.gob.pa and apply for authorization to stop reporting by LRIT equipment.

4.13.3 In case of the vessel are not normally engaged in international voyages but are required to undertake a single international voyage, or which are re-positioning from a GMDSS sea area A1, should apply to the Administration exemptions@segumar.com for consideration of exemption or equivalence in accordance with the provisions of SOLAS regulations I/4, IV/3.1, IV/3.2 and V/3.



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4.13.4 Any application for exemption or equivalence should include details of the proposed voyage including dates, length of voyage, port/place of departure and port/location of destination.

4.13.5 The Recognized Organization will liaise with the PMA and if the exemption is granted or equivalent arrangement accepted, the PMA will authorize the Recognized Organization accordingly and advise of any applicable conditions in order that the affected certificate can be duly annotated.

4.13.6 Panamanian vessels applying for exemptions should note that, in accordance with MSC.1/Circ. 1295 Guidance for certain ship types which are required to transmit LRIT info on exemptions, equivalents and certain operational matters, there may be a requirement for the Company to submit the voyage plan (and any amendments) and/or to report at specified intervals to not only the government(s) of the State(s) where the vessel is proceeding but also, the government(s) of the coastal State(s) in whose waters the vessel might be navigating, subject to those countries being entitled to the information in accordance with the requirements of SOLAS V/19-1.

4.13.7 Applications for permanent exemptions for offshore units operating in a fixed location, such as FPSOs, are to be made direct to the PMA exemptions@segumar.com. The exemption request should state the position of the unit (latitude/longitude) and the period of time that the unit will remain at the specified location. Where no period of time is stated, the exemption will be valid until the expiry date of the radio related certificate.

4.14 Non-compliance.

4.14.1 It is mandatory, that the Long-Range Identification and Tracking Equipment (LRIT) and the Automatic Identification System (AIS) maintain a permanent and adequate operation, avoiding by all possible means that they stop transmitting information on the identity and position of the vessel.

4.14.2 According to Resolution No. 106-048-DGMM dated August 19, 2021 all Panamanian flagged vessels that deliberately deactivate the Long-Range Identification and Tracking Equipment (LRIT) and the Automatic Identification System (AIS) will be sanctioned for noncompliance with the Panama Maritime Authority Regulations.



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4.14.3 Panamanian-flagged vessels engaged in fishing, fishing-related activities that are not reporting their positions through the Automatic Identification System (AIS) and/or the Long-Range Identification and Tracking System (LRIT) equipment will be sanctioned and/or cancelled from the Panamanian registry in accordance with the provisions of the Resolution No. 106-077-DGMM dated August 9, 2023.

September, 2025 – Paragraph 4.2.1, 4.4.1, 4.12.2 and 4.13.3 were modified.

May, 2025 - Restructuring of the entire circular.

May, 2024 – Scratch out in numeral 16.4 item was removed.

April, 2024 – March, 2024 paragraph details was modified, being the correct form: Paragraph 15.2 updated, removing in case of change of owner, item. Paragraph 15.8 updated, including the item for change of owner and adding the reference of the cost for amended certificate.

March, 2024 – Paragraph 14.2 updated, removing in case of change of owner, item. Paragraph 14.8 updated, including the item for change of owner and adding the reference of the cost for amended certificate.

May, 2023 - References were updated, entire revised, new paragraphs 13, 14 and 15 included. The annual conformance test included issuance of Electronic Certificate (QR introduced).

November, 2020 - New paragraph 3, 7, 8, 10 / Update ASP name and contact details.

May 2017 – Update ASP and NDC name, physical address and contact details

July, 2014 – Update of email address

April, 2012 – Update of email address

August, 2009 – Addition of two CSP and changes in contact information

December, 2008.

Inquiries concerning the subject of this Merchant Marine Circular, or any other request should be forward to:

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Phone : (507) 501-5016

E-mail : conformancetest@amp.gob.pa, conformance-test-panama@polestarglobal.com

Website: <https://panamashipregistry.com/circulars/>