

## Technical Notice

# TD 10552/2024

Dated: 30.04.2024

**SUBJECT:**  
**Revision of PMA MMC-195**  
**LRIT conformance test**



LRIT Conformance Testing and Certification for Panama-Flagged-Vessels is regulated by the Panama Maritime Authority Merchant Marine Circular MMC-195 (last revision March 2024).

Starting July 1st, 2023, LRIT Conformance Test Reports issued on behalf of the Government of Panama are issued in electronic format only and are delivered as digitally signed PDF documents sent by email.

Latest revisions of MMC-195, among others, **focusing** to:

1. The LRIT conformance test shall be carried out within one year from the initial/latest conformance test, in addition to cases of all new installations. To comply with this annual conformance test, Panamanian vessels shall follow the timetable as below:
  - a. Vessels having the conformance test completed prior to 31 December 2018, should complete the test before the end of September 2023.
  - b. Vessels having the conformance test completed between 1 January 2019 and 31 December 2021, should complete the test before the end of November 2023
  - c. Vessels having the conformance test completed after 1 January 2022, should complete the test before 31 December 2023.
2. Vessels that have successfully completed a Conformance Test before 1 July 2023, and request their first annual Conformance Test Report between 1 July 2023 and 31 December 2023 (but the conformance test was carried out within one year), will be allowed to obtain an the below updated annual Conformance Test Report. (point 15.5 of the PMA circular).

3. Point 14. of the circular about test and contact information.

- **Conformance Test Report** (CTR) valid for **one year** will be issued **when the Annual Conformance Test is completed**. During SE surveys which are carried out after the above (1a, b, c) INSB Class Surveyor would confirm whether the latest CTR is valid. It is not necessary to arrange the Annual Conformance Test at the timing of SE surveys.
- All Panamanian registered vessels that deliberately deactivate the LRIT may be subject to be sanctioned in accordance with point 16. of the PMA circular.
- In case the change of owner, it is not necessary to perform CT additionally. However, it is required to update CTR to the new format.
- In case the change of flag, it is not necessary to perform CT additionally unless the ASP (Application Service Provider) needs to be changed for this purpose. However, it is required to update CTR to the new format.

**Attachment**  
[Revision of PMA MMC-195 LRIT conformance test](#)

# 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.  
Resolution MSC.202(81) of May 19, 2006, SOLAS Convention, Chapter V, Reg. 19-1, amendments on Long Range Identification and Tracking (LRIT), adopted by Resolution No. 106-OMI-06-DGMM of November 26, 2007.  
Resolution J.D. No. 063-2022 of November 17, 2022.

### Recommendatory only:

- Resolution MSC.263(84) adopted on 16 May 2008, revised performance standards and functional requirements for the Long-Range Identification and Tracking (LRIT) of Ships.
- Circular MSC.1/Circ.1295 of December 8, 2008, Guidance in relation to certain types of ships which are required to transmit LRIT information, on exemptions and equivalents and on certain operation matters.
- Circular MSC.1/Circ.1307/Rev.1 of November 28, 2022, guidance on the survey and certification of compliance of ships with the requirement to transmit LRIT information.

---

1. This Merchant Marine Circular replaces **MMC-197** and **MMC-249**

## 2. Purpose

- 2.1. Ensure that all vessels registered under the Panamanian flag comply with the LRIT certificate and thus ensure that they issue their daily positions properly and permanently.



# Merchant Marine Circular

## 3. Scope

- 3.1. The Maritime Safety Committee (MSC) of the International Maritime Organization (IMO) has adopted Resolution MSC.202(81) of May 19, 2006; amending SOLAS V/ 19-1 to include the Long-Range Identification and Tracking system for ships (LRIT).
- 3.2. LRIT requirements entered into force internationally on January 1, 2008 with compliance dates for ship-owners beginning January 1, 2009.
- 3.3. All Panamanian flagged vessels under SOLAS V/19-1 regulation must comply with LRIT requirements.

## 4. Applicability, Requirements and Guidelines

- 4.1. LRIT requirements apply to the following ships engaged on international voyages:
  - 4.1.1. All passenger ships including high speed craft; and
  - 4.1.2. Cargo ships, including high speed craft of 300 gross tonnage and above; and
  - 4.1.3. Mobile offshore drilling units.
5. LRIT Shipborne 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:
  - 5.1. The identity of the ship
  - 5.2. The position of the ship; and
  - 5.3. The date and time of the position.
6. Applicable ships are generally required to be compliant not later than the first date of radio survey after January 1, 2009. Refer to Resolution MSC.202(81) of May 19, 2006 for specific guidance based on the date of construction and operating area(s) of the ship.
7. Taking into consideration that radio equipment on board of some Panamanian flagged vessels may not conform to the LRIT Performance Standards, and that some vessels can confront some delays in order to carry out satisfactory the conformance test, this Administration can, in a case-by-case basis, grant authorizations in the following way:



# Merchant Marine Circular

- 7.1. In those cases where the vessel is undergoing the radio survey, and does not have onboard a Conformance Test Report, but the Recognized Organization confirms that there is evidence that the Recognized ASP has initiated the testing, the Recognized Organization could issue a Conditional Safety Equipment Certificate valid for three months, without previous authorization from the Segumar Office; but must submit, without delay, a copy of the Conditional Certificate together with the supporting documentation to Segumar Office.
- 7.2. In cases where the vessel has the radio survey, and already complete the conformance test, but the equipment onboard does not comply with the LRIT performance standards, this Administration shall grant an authorization to the Recognized Organization to issue a Conditional Safety Certificate valid for three months, this will allow the vessel more time to obtain the new equipment. The request to issue conditional certificates shall be supported with evidence that the vessel has already requested the new equipment.
- 7.3. Under no circumstances the Recognized Organization shall issue a full-term Safety Equipment Certificate if the vessel does not have onboard a Conformance Test Report, or in cases where the vessel is not added to the national data center.
- 7.4. The Panamanian ships will not be charged for the costs of LRIT transmissions.
- 7.5. The four (4) mandatory messages per day and the polling requests will be paid by the Administration with no charge to the ship owners.

## 8. Procedure for Shipborne LRIT Equipment Testing

- 8.1. The Panama Maritime Authority (AMP), by Resolution No. 106-38-DGMM issued 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).
- 8.2. 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.



# Merchant Marine Circular

- 8.3.** In order to achieve fleet compliance with the Conformance Test Certificate, we inform you that our LRIT provider, Pole Star Space Applications Ltd., S.A. will contact users or companies as soon as the Vessel Registration Department of this Directorate General of the Merchant Marine notifies the registration of a new vessel under the Panamanian flag, in order to proceed to include the vessel in the National Data Center and obtain the appropriate the compliance test.
- 8.4.** Vessels registered in Panama are equipped with LRIT compliant Inmarsat-C equipment, however, a small percentage may not meet the LRIT Performance Standards for a variety of operational, physical, and technical reasons. Therefore, shipowners and masters are advised to take early action by consulting with equipment manufacturers to ensure that their onboard LRIT equipment fully complies with the requirements of MSC.263(84) of 16 May 2008 and MSC.1/Circ.1296 of 8 December 2008.

## **9. Communications Service Providers (CSP) for Panama Registered Ships**

- 9.1.** Ship owners may operate LRIT shipborne equipment preferably with the following Communication Service Providers (CSP). In all cases the shipborne equipment must still be tested pursuant to Circular MSC.1/Circ.1307/Rev.1 of November 28, 2022, to confirm correct operation:

- Inmarsat-C (provides coverage for sea areas A1, A2, A3)
- Iridium (provides coverage for sea areas A1, A2, A3, A4)

## **10. Application Service Provider (ASP) for Panama Registered Ships**

- 10.1.** According to the Contract No. A-3017-2022, the service of Supply and Operation of Vessel Identification and Tracking System of the Ship Registry of The Republic of Panama and Related Services was granted to the Recognized Company:

### **CONSORCIO MARITIME INTELLIGENCE GROUP 2022.**

3d Floor, the Studio Building, 21 Evesham St.,

London W11 4AJ, United Kingdom

Telephone: + 44 2073137400

Fax: +44 20 7313 7401

Email: [conformance-test-panama@polestarglobal.com](mailto:conformance-test-panama@polestarglobal.com)





# Merchant Marine Circular

## 11. National Data Center (NDC) for Panama Registered Ships

- 11.1. All Panama registered ships will send data to the Panama National Data Centre (NDC), via the Recognized ASP. AMP has appointed the following company to operate the Panama NDC on its behalf:

**CONSORCIO MARITIME INTELLIGENCE GROUP 2022.**

3rd Floor, the Studio Building, 21 Evesham St.,

London W11 4AJ, United Kingdom

Telephone: + 44 2073137400

Fax: +44 20 7313 7401

Email: [conformance-test-panama@polestarglobal.com](mailto:conformance-test-panama@polestarglobal.com)

## 12. Configuring Shipborne Equipment:

- 12.1. The following guidance is provided to assist ship owners and masters with determining suitability of existing equipment for LRIT. This information is not intended to be exhaustive of all possible configurations, is subject to change and may contain errors as it is supplied by manufacturers and other third parties.

- 12.2. For Inmarsat-C shipborne equipment; the make and model of equipment may be determined using the first six digits of the Inmarsat Serial Number (ISN). If the equipment appears to be LRIT capable; the following steps should be taken:

- Contact the manufacturer to confirm that the shipborne equipment has current software/firmware versions; and
- Ensure that Polling & Data Reporting (PDR) functions are enabled; and
- Ensure that Macro Encoded Message 11 (MEM-11) is enabled.

13. In case you have any inquiries regarding LRIT functioning or LRIT equipment is not reporting properly.

14. Please contact the Recognized ASP at: [conformance-test-panama@polestarglobal.com](mailto:conformance-test-panama@polestarglobal.com); or at the 24 x 7 Support center +44 20 7313 7403

- 14.1. For detailed information on how to request a Conformance Test and/or a Conformance Test Report, please refer to: <https://www.polestarglobal.com/software-solutions/lrit-conformance>



# Merchant Marine Circular

## 15. New requirements for Conformance Testing:

- 15.1. The permanent monitoring of our fleet through LRIT and AIS, allows us to have greater control of the Panamanian Fleet (LRIT), ensuring that the fleet complies with international regulations.
- 15.2. Based in this information and the natural operational designation of the onboard equipment the conformance test in required in the following cases:
- All new installations
  - After one year from the initial/latest conformance test performed upon the registration of the vessel under the Panama Flag.
- 15.3. To comply with this annual conformance test, vessels already in our fleet (Panama Flag), shall follow this timetable:

Conformance Test Renewal Scheme
<ol style="list-style-type: none"><li>1. Vessels having the conformance test completed prior to December 2018, should complete the test before the end of September 2023.</li><li>2. Vessels having the conformance test completed between January 1<sup>st</sup> 2019 and December 31<sup>st</sup>, 2021 should complete the test before the end of November 2023</li><li>3. Vessels having the conformance test completed after January 1<sup>st</sup>, 2022, should complete the test before December 31<sup>st</sup>, 2023.</li></ol>



- 15.4. **It is important to mention that vessels whose proof of Conformance Test is less than one year old, must carry out the Conformance Test when the existing Conformance Test Report is one year old.**
- 15.5. Vessels that have successfully completed a Conformance Test before July 1<sup>st</sup>, 2023, and request their first annual Conformance Test Report between July 1, 2023, and December 31, 2023, will be allowed to obtain an updated annual Conformance Test Report supported by their existing Conformance Test, provided that Conformance Test is still valid, as per MSC.1/Circ.1307, and the vessel has transmitted LRIT information to the National Data Center as expected at least 82% of the time during a period of up to twelve months prior to the date when the updated Conformance Test Report is requested.





# Merchant Marine Circular

- 15.6.** The Recognized ASP and operator of the National Data Center is instructed to supply upon request, the percentage of time the vessel has reported as expected during the indicated period. To obtain such information contact the National Data Center or request it when making arrangements to obtain the updated Conformance Test Report.
- 15.7.** The updated Conformance Test Reports will include the same information as the current reports plus the following information:
- The expiration date of the Conformance Test Report shall be one year after the date of issue.
  - A QR code that links to a web page where the compliance status of the vessel can be verified.
- 15.8.** Please be advised that:
- Starting July 1<sup>st</sup>, 2023, all Conformance Test Reports issued on behalf of the Government of the Republic of Panama will be issued as electronic documents in digitally signed PDF format.
  - Changes to ship particulars (Ship Name, 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 case of change in ownership won't be required a new Conformance Test but will be required an updated Conformance Test Report which will have cost.
  - An amended Conformance Test Report does not extend its validity period.
  - No Conformance Test Reports will be issued on behalf of the Government of the Republic of Panama for Conformance Tests completed more than a year before.
  - The Panama Maritime Authority will no longer accept Conformance Tests completed while the vessel was in a different flag prior to joining the Panama Registry.



# Merchant Marine Circular

## 16. Sanctions

- 16.1.** All Panamanian registered vessels that deliberately deactivate the Long Range Identification and Tracking Equipment (LRIT) or the Automatic Identification System (AIS) may be subject to be sanctioned.
- 16.2.** This sanction shall also apply to all those vessels that have been detained or restricted within the jurisdictional waters of the Republic of Panama, and without authorization from the Directorate General of Merchant Marine, change position or perform any commercial activity, and/or deactivate, manipulate, or alter the Long-Range Identification and Tracking System (LRIT) or the Automatic Identification System (AIS).
- 16.3.** This Directorate General of the Merchant Marine is monitoring our entire fleet 24 hours a day, 7 days a week, so if the Long Range Identification and Tracking System (LRIT) or the Automatic Identification System (AIS) is down or not reporting, an automatic alert will be sent to the Department of Navigation and Maritime Safety (Fleet Control and Monitoring Section), where the responsible personnel will initiate an internal investigation of such alert, and if there is no technical support to justify the missing report, it may culminate with the sanctions deemed appropriate. In some cases, in which it is detected that the vessel has this behavior on a regular basis, it could be de-flagged or removed from the registry.
- 16.4.** It is mandatory, that the Long-Range Identification and Tracking Equipment (LRIT) or 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.
- 16.5.** By Resolution J.D. No. 063-2022 dated November 17, 2022, the sanctions established for these actions, could carry from \$10,000.00 up to \$100,000.00 U.S. Dollars and/or deregistration/deregistration of the vessel from our Merchant Marine Fleet.



# Merchant Marine Circular

**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:

Navigation and Maritime Safety Department  
Control and Monitoring Section  
General Directorate of Merchant Marine  
Panama Maritime Authority

Phone: (507) 501-5016

E-mail: [conformance-test-panama@polestarglobal.com](mailto:conformance-test-panama@polestarglobal.com) / [cym@amp.gob.pa](mailto:cym@amp.gob.pa)

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