Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-194

To: Shipowners, Ship-operators, Masters, Recognized Organizations, Manufacturers/Service Stations and Legal Representatives of Panamanian-flagged vessels, and Manufacturers

Subject: Extended service intervals not exceeding 30 months for novel inflatable liferafts.

Reference:
a) The International Convention for the Safety of Life at Sea, 1974, adopted through Law No. 7 dated October 27, 1977;
b) The Protocol of 1978 to the SOLAS Convention, adopted through Law No. 12 dated November 9, 1981;
c) The Protocol of 1988 to the SOLAS Convention, adopted through Law No. 31 dated July 11, 2007;
d) The International Life-saving Appliance Code, adopted through Resolution No.106-OMI-20-DGMM of December 26, 2007;
e) Resolution No.106-10-DGMM dated February 26, 2008;
f) Resolution No.106-084-DGMM dated November 27, 2025
g) MSC.1/Circ.1328 – Guidelines for the approval of inflatable liferafts subject to extended service intervals not exceeding 30 months dated June 11, 2009, adopted through Resolution No.106-OMI-89-DGMM of March 17, 2011;
h) Resolution A.689(17) - Testing of Life-saving Appliances (**Only as Recommendation**);
i) MSC.81(70) – Revised Recommendation on Testing of Life-saving Appliances (**Only as Recommendation**);
j) Resolution A.761(18) – Recommendation on Conditions for the Approval of Servicing Stations for Inflatable Liferafts (**Only as Recommendation**).

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1. Purpose

The purpose of this circular is to inform stakeholders that this Administration has established certain requirements to allow extended service intervals not exceeding 30 months for novel inflatable Liferafts. Hence, a uniform and equivalent level of safety is maintained on board Panamanian-flagged ships carrying these novel inflatable liferafts onboard.

2. Background

According to SOLAS regulation III/20.8.3, this Administration may allow extended service intervals not exceeding 30 months for novel inflatable liferafts. These extended service intervals may be granted if the new and novel liferaft designs have demonstrated consistent performance that meets testing standards during the extended service periods. Moreover, the MSC.1/Circ.1328 established the minimum standards to ensure an equivalent and uniform level of safety is maintained during extended service intervals.

3. Scope

This Merchant Marine Circular applies to all novel inflatable liferafts installed or to be installed in Panamanian-flagged ships that seek permission from this Administration to be subjected to extended service intervals not exceeding 30 months. In addition, manufacturers who wish to provide these liferafts must follow the detailed instructions in paragraphs 7, 8, and 9.

4. Definitions

4.1. An **Extended service interval** is a service interval exceeding 12 months.

4.2. Service life means the same as lifetime and is the time passed since a liferaft was manufactured.

4.3. Onboard inspection means an inspection carried out on board a ship to verify the conditions of Liferafts without adversely affecting the protective arrangements.

4.4. Service (of inflatable Liferafts) means the execution of a control and maintenance process at an approved servicing station in accordance with resolution A.761(18).

4.5. An **Inspection Personnel**: is personnel certified to carry out onboard inspections.

4.6. A **novel Liferaft** is a Liferaft that embodies new features not fully covered by the provisions of Chapter III of the SOLAS Convention or the LSA Code, but which provides an equal or higher standard of safety.

4.7. Type of approval: Type approval is a certification process that verifies that product and system design meet regulatory requirements set by Classification Societies and Flag Administration. This process involves evaluating drawings and testing prototypes.

5. General Requirements for liferafts with extended service intervals not exceeding 30 months

To achieve the objective of this circular and adequate implementation of the MSC.1/Circ.1328, the following requirements shall be followed:

5.1. Servicing: Inflatable Liferafts with extended service intervals not exceeding 30 months, as per SOLAS regulation III/20.8.3, shall be serviced at an approved servicing station at intervals not exceeding 30 months for the first 10 years of their service life. Afterward, extended service intervals cannot exceed 12 months.

Additionally, refer to Paragraph 4.3.3 of the MSC.1/Circ.1328 if the extended service intervals exceed the lifetime of dated items.

5.2. Inspection: Inflatable Liferafts with extended service intervals not exceeding 30 months shall be inspected onboard by inspection personnel in accordance with the provisions of the MSC.1/Circ.1328 and the instructions of the manufacturer at intervals not exceeding 12 months from the last service or onboard inspection and for the first 10 years of their service life.

In addition, provisions established in Section 4.2 of MSC.1/Circ.1328 shall be followed to safeguard inspection personnel who carry out the annual inspection on board.

5.3. Testing: Liferafts with extended service intervals not exceeding 30 months shall be tested in accordance with MSC.1/Circ.1328 or other test procedures that are substantially equivalent.

5.4. Marking: Liferafts with extended service intervals not exceeding 30 months shall be marked to indicate that they have been satisfactorily approved and certified.

6. Additional requirements

Liferafts with extended service intervals not exceeding 30 months shall be built in such a manner that:

6.1. It can withstand all environmental influences;

6.2. It includes protective arrangements that protect any fitting and equipment provided inside;

6.3. During the onboard inspection, all items to be inspected are accessible without any relocation or any action that can jeopardize the protective arrangements;

6.4. When deployed and inflated, all disposable dated items are readily accessible from the interior;

6.5. During the annual inspection onboard, it is possible to evaluate the humidity level behind the protective barrier and to detect any leakage of inflation gas.

7. Requirements for permission/allowance/acceptance for novel inflatable liferafts

with extended service intervals not exceeding 30 months (First time)

7.1. Those Manufacturers who wish to provide novel liferafts with extended service intervals not exceeding 30 months shall submit the following requirements through sproviders@sproviders.com :

7.1.1. A copy of the Type of Approval Certificate (EC-Type Examination) for inflatable Liferafts subject to extended service intervals not exceeding thirty (30) months, which serves as evidence of the completion of the full 30-month demonstration by practical tests, which verifies suitability and involves representative types of Liferafts, onboard facilities, stowage height, and conditions of the different operational areas. The type of Approval Certificate shall be issued by a Classification Society that is part of IACS.

7.1.2. Copy of test records of inflatable Liferafts tested in accordance with the MSC.1/Circ.1328/Section 5 – Testing.

7.1.3. Copy of the report of the detailed ocular inspection of the same.

7.1.4. List of approved service stations according to RESOLUTION A.761(18) - Recommendation on conditions for the approval of servicing stations for inflatable Liferafts.

7.1.5. Copy of the "Production and Installation Test" of the model's prototype according the MSC.81(70)/Par.5.1 and 5.2.

7.1.6. Quality Control procedure that assures that the novel liferafts are produced to the same standard as the prototype.

7.2. Test sequence and test distribution

7.2.1. Based on the **capacity and type of liferaft(s)**[1], this Administration shall require novel liferafts to be subjected to all tests established in Section 5 of MSC.1/Circ.1328 as follows:

7.2.1.1. Scenario 1: If the request is only for liferafts from one range/type:

No.	Test	Test Rafts			
		1	2	3	4
1	Vibration/shock test	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔

[1] The relevant ranges of liferafts are mentioned in Par. 5.2.1 to 5.2.10 of the MSC.1/Circ.1328.

5	Drop test	✔	✔		
6	Cold inflation test			✔	✔
7	Pressure test	✔	✔	✔	✔
8	Floor steam test	✔	✔	✔	✔
9	Detailed inspection	✔	✔	✔	✔

7.2.1.2. Scenario 2: If the request is for liferafts from two different ranges/types:

No.	**Test**	**Test Rafts**			
		1	2	3	4
		1st Range/type		*2nd Range/type*	
1	Vibration/shock test	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔
5	Drop test	✔	✔		
6	Cold inflation test			✔	✔
7	Pressure test	✔	✔	✔	✔
8	Floor steam test	✔	✔	✔	✔
9	Detailed inspection	✔	✔	✔	✔

7.2.1.3. Scenario 3: If the request is for liferafts from three different ranges/types

No.	**Test**	**Test Rafts**							
		1	2	3	4	5	6	7	8
		1st Range/type		*2nd Range/type*		*3rd Range/type*			
1	Vibration/shock test	✔	✔	✔	✔	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔	✔	✔	✔	✔
5	Drop test	✔	✔	✔	✔				
6	Cold inflation test					✔	✔	✔	✔
7	Pressure test	✔	✔	✔	✔	✔	✔	✔	✔
8	Floor steam test	✔	✔	✔	✔	✔	✔	✔	✔

9	Detailed inspection	✔	✔	✔	✔	✔	✔	✔	✔

7.2.1.4. Scenario 4: If the request is for liferafts from four different ranges/types:

No.	Test	Test Rafts											
		1	2	3	4	5	6	7	8	9	10	11	12
		1st Range/type		*2nd Range/type*		*3rd Range/type*				*4th Range/type*			
1	Vibration/shock test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
5	Drop test	✔	✔	✔	✔	✔	✔						
6	Cold inflation test							✔	✔	✔	✔	✔	✔
7	Pressure test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
8	Floor steam test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
9	Detailed inspection	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

7.2.1.5. Scenario 5: If the request is for liferafts from five different ranges/types:

No.	Test	Test Rafts															
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16
		1st Range/type		*2nd Range/type*		*3rd Range/type*				*4th Range/type*				*5th Range/Type*			
1	Vibration/shock test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
5	Drop test	✔	✔	✔	✔	✔	✔	✔	✔								
6	Cold inflation test									✔	✔	✔	✔	✔	✔	✔	✔
7	Pressure test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
8	Floor steam	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

	test																
9	Detailed inspection	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

7.2.1.6. Scenario 6: If the request is for liferafts from six different ranges/types:

No.	Test	Test Rafts																			
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20
		1st Range/type		*2nd Range/type*		*3rd Range/type*				*4th Range/type*				*5th Range/Type*				*6th Range/Type*			
1	Vibration/shock test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
5	Drop test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔										
6	Cold inflation test											✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
7	Pressure test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
8	Floor steam test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
9	Detailed inspection	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

7.2.1.7. Scenario 7: If the request is for liferafts from seven different ranges/types:

No.	Test	Test Rafts																							
		1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24
		1st Range/type		*2nd Range/type*		*3rd Range/type*				*4th Range/type*				*5th Range/Type*				*6th Range/Type*				*7th Range/type*			
1	Vibration/shock test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
2	Dated item replacement test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
3	Damp heat cyclic test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
4	Access to lifting hook test (D/L rafts only)	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
5	Drop test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔												
6	Cold inflation test													✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
7	Pressure test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
8	Floor steam test	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔
9	Detailed inspection	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔	✔

7.2.1.8. Scenario 8: If the request is for liferafts from eight different ranges/types, then four additional liferafts shall be added, being 28 liferafts in total. While the first half (14) of the total liferafts (28) shall undergone drop test., cold inflation test shall be performed for the other second half (14) of the total liferafts (28)

8. Requirements for manufacturers that already have novel liferafts with extended service intervals not exceeding 30 months listed in this Merchant Marine Circular, who wish to provide additional models not listed

Manufacturers that already have models of novel liferafts subject to extended service intervals not exceeding 30 months listed in this Merchant Marine Circular and that seek to provide new models not yet listed in paragraph 11 shall send to sproviders@sproviders.com all the requirements requested in paragraph 7 above.

9. Limitation extension for liferafts with extended service intervals having a service life over 10 years

9.1. Paragraph 4.1.1 of the MSC.1/Circ.1328 stipulates that the 10-year limitation may be extended on a case-by-case basis if real-time verification justifies acceptance by this Administration. For this purpose, applicants are invited to send the following requirements[2] to sproviders@segumar.com :

9.1.1. A copy of the Type of Approval Certificate issued by an IACS - classification society as stated in paragraph 7.1.1 of this Merchant Marine Circular (several type/range can be included in one report).

9.1.2. Data covering the entire population of lferafts with extended service interval. This requirement may be either submitted alone or be included in the Real-time verification test program.

9.1.3. Statement of fabric quality (one statement per request).

9.1.4. Fabric life test report (one report per request).

9.1.5. Cycle test report for liferafts (Simulations shall consider at least the period of extension requested). (One report per request)

9.1.6. Real-time verification statement issued and stamped by an IACS-classification society (one statement per model).

9.1.7. Inspection report for real time verification of liferaft issued by manufacturer (one report per model). This report shall be supported with images and if reasonable videos.

9.1.8. Real-time verification test program (one document per request).

10. Inflatable Liferafts with extended service intervals not exceeding 30 months permitted by this Administration may be withdrawn if the requirements of this Merchant Marine Circular and any relevant IMO instrument are not complied with. This action will be given by a Note indicating the decision taken and the facts that motivated it.

11. Reporting of Accidents involving permitted inflatable Liferafts

Any accident caused by any failure involving the inflatable Liferafts model listed in paragraph 9 shall be reported to the following account:

[2] The Administration may request additional requirements besides the ones established in this Merchant Marine Circular.

sproviders@segumar.com.

12. List of Liferafts permitted to be subjected to extended service intervals not exceeding 30 months

No	Manufacturer's Company Name	Permitted liferafts Model	Type of liferaft	Limitation extension for liferafts having a service life over 10 years
1	VIKING LIFE-SAVING EQUIPMENT A/S	6 DK+S30	Throw overboard	☒
		6 DKN S30	Throw overboard	☒
		6 DKS S30	Throw overboard	☒
		8 DK +S30	Throw overboard	☒
		8 DKS S30	Throw overboard	☒
		10 DK + S30	Throw overboard	☒
		10 DKN S30	Throw overboard	☒
		10 DKS S30	Throw overboard	☒
		12 DK + S30	Throw overboard	☒
		12 DKR+ S30	Throw overboard	☒
		12 DKS S30	Throw overboard	☒
		12 DKSN S30	Throw overboard	☒
		12 DKF+S30	Davit launched inflatable liferaft	☒
		12 DKFS S30	Davit launched inflatable liferaft	☒
		12 MOR S30	Throw overboard	☒
		16 DK + S30	Throw overboard	☒
		16 DKS S30	Throw overboard	☒
		16 DKSN S30	Throw overboard	☒
		16 DKF+S30	Davit launched inflatable liferaft	☒
		16 DKFS S30	Davit launched inflatable liferaft	☒
		20 DK + S30	Throw overboard	☒
		20 DKS S30	Throw overboard	☒
		20 DKF+S30	Davit launched inflatable liferaft	☒
		20 DKF+GN S30	Davit launched inflatable liferaft	☒
		20 DKFS S30	Davit launched inflatable liferaft	☒
		25 DK + S30	Throw overboard	☒
		25 DKS S30	Throw overboard	☒

		25 DKFS S30	Davit launched inflatable liferaft	☒
		25 DKSN S30	Throw overboard	☒
		25 DKR+ S30	Throw overboard	☒
		25 DKF+S30	Davit launched inflatable liferaft	☒
		35 DK + S30	Throw overboard	☒
		35 DKS S30	Throw overboard	☒
		35 DKF+S30	Davit launched inflatable liferaft	☒
		35 DKFS S30	Davit launched inflatable liferaft	☒
		39 DKS S30	Throw overboard	☒
		39 DKSN S30	Throw overboard	☒
		39 DKFS S30	Davit launched inflatable liferaft	☒
		50 DKS + S30	Throw overboard	☒
		50 DKS LS2 S30	Throw overboard	☒
		50 DKS SBS S30	Throw overboard	☒
		50 DKR+ S30	Throw overboard	☒
		65 DKR+ S30	Throw overboard	☒
		100 DKS + S30	Throw overboard	☒
		100 DKS SBS S30	Throw overboard	☒
		100 DKS VEMC S30	Throw overboard	☒
		100 DKS VES S30	Throw overboard	☒
		100 DKS ADD S30	Throw overboard	☒
		100 DKS VEC+S30	Throw overboard	☒
		100 DKR+ S30	Throw overboard	☒
		150 DKS + S30	Throw overboard	☒
		150 DKS LS3 S30	Throw overboard	☒
		150 DKS SBS S30	Throw overboard	☒
		150 DKS ADD S30	Throw overboard	☒
		150 DKS VEDS no.2 and 3 S30	Throw overboard	☒
		150 DKS VEDS no.1 S30	Throw overboard	☒
		150 DKR+ S30	Davit launched inflatable liferaft	☒
2	SURVITEC GROUP	6P MK4 Extended Service	Throw overboard	☐

		8P MK4 Extended Service	Throw overboard	☐
		10P MK4 Extended Service	Throw overboard	☐
		12P MK4 Extended Service	Throw overboard	☐
		16P MK4 Extended Service	Throw overboard	☐
		20P MK4 Extended Service	Throw overboard	☐
		25P MK4 Extended Service	Throw overboard	☐
		35P Self Righting Extended Service	Throw overboard	☐
		12P MK4 Extended Service	Davit launched inflatable liferaft	☐
		16P MK4 Extended Service	Davit launched inflatable liferaft	☐
		16P Survitec Zodiac Extended Service	Davit launched inflatable liferaft	☐
		20P MK4 Extended Service	Davit launched inflatable liferaft	☐
		25P MK4 Extended Service	Davit launched inflatable liferaft	☐
		35P Self Righting Extended Service	Davit launched inflatable liferaft	☐
		37P Survitec Zodiac Extended Service	Davit launched inflatable liferaft	☐

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November, 2026 *– The following modification was made: 1) paragraphs 9.1.1, 9.1.2, 9.1.3, 9.1.4, 9.15, 9.16, 9.17 and 9.18. were amended and 2) SURVITEC GROUP Liferafts permitted to be subjected to extended service intervals not exceeding 30 months were added.*
January, 2026 *– The Marine Merchant Circular was entirely revised.*
July, 2021 *– New model added 150DKS + S30, references were updated.*
December, 2008.

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

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