

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-217

To: Ship-owners / Operators, Company Security Officers, Designates Persons Ashore, Legal Representatives of Panamanian Flagged Oil Tankers, Panamanian Merchant Marine Consulates and Recognized Organizations (RO's).

Subject: Ship to Ship (STS) transfer operations and flag notification.

Reference: Law No. 17 of November 9, 1981, and protocol Law No. 1 of October 25, 1983 – MARPOL 73/78.
Executive Decree No. 512 of October 18, 2024
Resolution J.D. No. 038-2022 of August 25th, 2022.
Resolution No. 106-OMI-087-DGMM of November 22, 2010, adopted Resolution MEPC.186(59) of July 17, 2009.
Resolution No. 106-048-DGMM of August 19, 2019.
Resolution No. 106-035-DGMM of April 11, 2025.
Resolution A.1192(33), adopted on December 6, 2023 (**only recommendation**).

1. Purpose.

- 1.1. This Merchant Marine Circular is to inform all owner/operators regarding the new requirements established for Ship to Ship (STS) Operations concerning Panamanian Oil Tankers of 150 GRT and above.

2. Scope.

- 2.1. This Administration adopted through Resolution No. 106-OMI-087-DGMM the Resolution MEPC.186(59) of July 17, 2009, by which amendments to Annex I of the Protocol of 1978 to the MARPOL 73/78, added the Chapter 8 regarding "Prevention of Pollution during the Transshipment of Oil Cargoes between Tankers at Sea".
- 2.2. Also, the International Maritime Organization (IMO) adopted on December 6, 2023, Resolution A.1192(33), urging member states to promote actions to prevent illegal operations by the Dark Fleet or Shadow Fleet.
- 2.3. Therefore, the Republic of Panama attending the call of the IMO adopted through the [Resolution No. 106-035-DGMM of April 11th, 2025](#) a new requirement to regulate STS transfers in order to prevent illegal operations of the Dark Fleet or Shadow Fleet. Furthermore, please be advised the aforementioned resolution is available in English and in Spanish (visit Maritime Security link, STS Regulations).

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3. Applicability

3.1. All Panamanian flagged Oil Tankers of 150 gross tonnage and above, engaged in the transfer of oil cargo between oil tankers (STS operations) wherever they are located.

3.2. The requirement for an STS Operation Plan does not apply to:

- Bunkering operations;
- STS operations within the territorial sea or exclusive economic zone of Panama must follow the provisions of Resolution J.D. No. 038-2022 of August 25th, 2022;
- Oil transfer operations associated with fixed or floating platforms, including drilling rigs; FPSOs used for the offshore production and storage of oil; and FSUs used for the offshore storage of produced oil;
- STS operations necessary for securing the safety of a ship or saving lives at sea, or combating specific pollution incidents to minimize damage from pollution;
- STS operations where either of the ships involved is a warship, naval auxiliary or other ship owned or operated by a State and used, for the time being, only on government non-commercial service.
- Fishing vessels.
- Vessels engaged in Fishing related activities.

4. STS Operations Plan

4.1. Any oil tanker subject to MARPOL Annex I, Chapter 8 involved in STS operations, shall carry on board an STS operations Plan prescribing how to conduct such STS operations.

4.2. The STS operation Plan shall be developed taking into account the safety and pollution prevention provisions of the International Maritime Organization (IMO) conventions and the information contained in the best practice guidelines for STS operations identified by the Organization (IMO's "Manual on Oil Pollution, Section I, Prevention" as amended, and the ICS and OCIMF "Ship-to-ship Transfer Guide, Petroleum", fourth edition, 2005), and shall be written in English and the working language of the ship. STS operations shall be conducted according to the approved STS Operations Plan.

4.3. To ensure that ships flying the flag of the Republic of Panama adhere to measures which lawfully prohibit or regulate STS transfers operations, and further adhere to the spirit of the safety and pollution prevention requirements in IMO conventions, especially chapter 8 of Annex I of the International Convention for the Prevention of Pollution from Ships (MARPOL), 1973, to minimize the risk of oil pollution; the Republic of Panama requires according to Resolution No.106-035-DGMM from April 11, 2025, that ships update their STS Operations Plan to include notifying this Administration when and where they are engaged in such operations, especially when they are engaged in a mid-ocean STS transfer.

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- 4.4. All Ship Operator Companies of all Panamanian flagged oil tankers of 150 GT and above shall update their STS Operations Plan to include the Notification to the Flag State regarding when and where this STS operations will take place.
- 4.5. All Ship Operator Companies of all Panamanian flagged oil tankers of 150 GT and above should contact the Recognized Organizations to obtain approval for updated STS Operations Plan.
- 4.6. Records of oil cargo transfer operations required to be recorded in the Oil Record Book and Emissions Part II – Cargo and Ballast operation Book, and any records required by the STS Operations Plan shall be retained on board for three years.

5. Instructions for Recognized Organizations

- 5.1. The STS Operations Plan shall be approved by authorized Recognized Organizations on behalf of the Republic of Panama.
- 5.2. Updated STS Operations Plan shall be revised by the authorized Recognized Organizations (RO) no later than the first annual, intermediate or renewal survey of the *International Oil Pollution Prevention Certificate (IOPP)*, whichever occurs first, after **August 6, 2025**. To verify that the information listed in paragraph 6.6 has been included.
- 5.3. Recognized Organizations interested in obtaining authorization / delegation of authority for the approval of the STS Operations Plan contact ro-monitoring@segumar.com.

6. STS transfer Notification in a mid-ocean operation

- 6.1. STS transfer notification is crucial to minimize the risk of oil pollution and ensuring compliance with safe shipping standards, especially when transferring cargo between ships in a mid-ocean.
- 6.2. Starting from **August 6th, 2025**, all Panamanian flagged oil tankers, acting as discharging or/and receiving vessel must notify their STS transfer operations to the Flag State through the E-Segumar Platform.
- 6.3. In the event that the STS operation is carried out between two Panamanian flagged oil tankers, both vessels must notify the STS transfer operation to Panama Flag State through the E-Segumar Platform.
- 6.4. All the Panamanian flagged oil tankers must maintain valid and updated Continuous Synopsis Record (CSR) and Conformance Test Report (CTR) on board at the time of

notifying the STS operations. Failure to comply with the aforementioned will result denying the authorization for STS operations until compliance is demonstrated.

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6.5. The STS transfer Notification must be provided well in advance and at least forty-eight (48) hours prior to the planned STS transfer operations. An acknowledgement of receipt will be issued by the Flag State through the E-Segumar Platform which shall be kept on board in electronic format for a minimum period of three (3) years.

6.6. The STS transfer notification shall include the following information:

6.6.1. Name, flag, call sign, IMO Number and estimated time of arrival of the oil tankers involved in the STS transfer operation.

6.6.2. Date, time and geographical position of the commencement of the planned STS transfer operation.

6.6.3. Mode in which the STS transfer operation will be carried out: at anchor or underway.

6.6.4. Type of oil and its quantity.

6.6.5. Expected duration of the STS transfer operation.

6.6.6. Identification and contact information (email, telephone number) of the Designated Person Ashore (DPA) of each oil tanker involved in the STS operation.

6.6.7. Confirmation that the oil tanker has on board an STS operations Plan complying the requirements of regulation 41, Annex I, MARPOL Convention.

6.7. If the estimated time of arrival of an oil tanker at the location or area for the STS transfer operation changes by more than six hours or in the event that the STS operation is cancelled due to any issue, the Master, Owner, or Designated Person Ashore (DPA) must immediately inform the Administration via the following email address:
stspma@amp.gob.pa

6.8. Failure to provide timely notification may lead to administrative measures, in accordance with the applicable maritime regulations and oversight procedures established by the Administration.

7. Enforcement

7.1. All Panama flagged Oil Tankers of 150GT and above, shall comply with the provisions of the Resolution No. 106-048-DGMM of November 19, 2019, on LRIT and AIS provisions (especially regulations 19 and 19-1 of chapter V of SOLAS Convention), and the National legislation of the Republic of Panama; meaning that when ships are engaged in STS transfer operations the AIS and LRIT must be working properly.

7.2. It is prohibited that Panamanian flagged Oil Tankers of 150GT and above engage in STS transfer operations with sanctioned vessels included in the international sanction lists recognized by the Panamanian State.

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7.3. Panama flagged Oil Tankers of 150GT and above failing to comply with the provisions Panama national legislation may be subject to sanctions among them the registry cancellation, in accordance with the seriousness of the facts.

For further assistance, please contact us on the emails below.

July, 2025 – Restructuration of all Circular.

November, 2023 – The reference was revised and the scope of paragraph 2.

July, 2002.

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

Fleet control and Monitoring Section
Maritime Ship Security Department
General Directorate of Merchant Marine
Panama Maritime Authority

Phone: +(507) 501-4223 / 5351

Email: stspma@amp.gob.pa / ro-panama@segumar.com

Website: <https://www.panamashipregistry.com/segumar/merchant-marine-circulars/>