

**GIBRALTAR MARITIME ADMINISTRATION**  
(Ministry of Maritime Affairs)



Watergate House  
2/8 Casemates Square  
Gibraltar

Tel (+350) 200 46862 /200 47771 / 200 50424  
Fax (+350) 200 47770  
e-mail: [maritime.info@gibraltar.gov.gi](mailto:maritime.info@gibraltar.gov.gi)  
[maritime.registry@gibraltar.gov.gi](mailto:maritime.registry@gibraltar.gov.gi)  
[maritime.survey@gibraltar.gov.gi](mailto:maritime.survey@gibraltar.gov.gi)

**Shipping Information Notice – No 023**  
**LONG RANGE IDENTIFICATION TRACKING (LRIT) SYSTEM UPDATE**

---

To: Ship Owners, Operators, Masters, Officers, Local Representatives

---

**This Shipping Information Notice updates owner/operators on the outcome of recent debate on LRIT at MSC 86 and provides advice on the information to be carried on the ships**

### **1 Background**

1. Owner/operators would recall that LRIT was required to be operational from 1 January 2009 on all ships. However, due to inadequate provisions and the lack of established data centres, it was decided at MSC 85 to allow for a six month transitional period.
2. The transitional arrangement then exempted ships for a further six months giving them more time to meet the mandatory carriage requirements and avoid penalties or risk of prosecution.
3. As a result of deliberations at MSC 86, IMO decided that the transitional arrangements will come to an end on **30 June 2009** as initially agreed and the full LRIT operations will start then.
4. Some Contracting Governments (Australia, USA & Canada) have indicated that there will be concentrated efforts by their Port State inspectors to ensure compliance and that they would not hesitate to detain ships if they failed to transmit irrespective.
5. This is a matter of concern because if the shipboard equipment is found to be transmitting correctly and the ship has been issued with a Conformance Test Report (CTR) then it is not their fault and is a matter beyond their control.
6. However, if any members are faced with an issue as described above, then the ship's best defence would be to highlight to the Port state inspector that their flag states are signatory to the contents of the guidance issued as per MSC.1-Circ.1298 Annex Paragraph 11 (Ship not transmitting due to outside failure of the LRIT system).
7. It is clearly stated in the circular that the ships should not be detained or risk prosecution against them for non compliance in this instance.

## 2 Gibraltar Implementation

8. To date, figures show that over 230 Gibraltar registered ships have been tested successfully and Conformance Test Reports (CTR's) have been issued by the five Gibraltar approved ASPs.
9. Furthermore, the EU LRIT Data Centre is ready for operations but needs the 32 EU LRIT DC national contributors to upload their LRIT ship data in order to function properly.
10. **Gibraltar Maritime Administration advises owner/operators to inform all their vessels which have a LRIT carriage requirement, to ensure that the equipment transmitting LRIT data is serviceable and switched on, and that the LRIT function enabled on board.**
11. **The ship should carry a copy of the Conformance Test Report with the ships papers**
12. **The GMA further suggests that this action should be undertaken immediately so that ships arriving in port after that date can be shown to have tried to comply during the voyage.**

## 3. Other Matters and Port State Control

13. It is also worth noting that some Contracting Governments have declared a 1,000nm LRIT surveillance area. Such action will ensure that as soon as the EU LRIT DC has a ship's data populated and starts to poll the ship, she can respond.
14. Ships should also ensure that they have the CTR on board, and the correct notations made to the equipment list in the Safety Equipment Certificate or Passenger Ship Safety Certificate as appropriate.

### 15. All these actions should help with Port State Control.

16. In the event that a Port State Control Inspector is not satisfied, Masters should make best use of the provisions of MSC.1-Circ.1298 Annex paragraph 11 (Ship not transmitting due to outside failure of the LRIT system) and paragraph 12 (time in repair and refit)", produced below are the contents of the paragraph in full;

#### a. **MSC.1-Circ.1298 Annex Paragraph 11 - Ship not transmitting due to outside failure of the LRIT system;**

- i. **11.1** - When the LRIT information transmitted by a ship cannot be received by those entitled to receive such information, for example a Contracting Government as a Port State, due to a failure or a situation outside the control of the ship, for example:
  1. due to a failure of the CSP or the ASP or of the LRIT Data Centre; or
  2. because the Administration has not made the/any necessary arrangements; or
  3. because the LRIT Data Centre to which the ship is transmitting LRIT information is declining to provide the requested LRIT information to the LRIT Data Centre it is requesting them due

to their financial disputes, in view of the fact that the failure or the situation is outside of the control of the ship,

**4. Contracting Governments should not impose sanctions on the ship because they are unable to receive LRIT information transmitted by the ship.**

- ii. **11.2 - As matters are beyond the control of the ship, no grounds arise for either delaying or detaining the ship pursuant to the provisions of regulations I/19 and V/16 as long as the Conformance Test Report and related radio certificate are valid.** However, it is possible that a Contracting Government, unaware of the circumstances, might decide to impose control measures or steps pursuant to regulation XI-2/9. To avoid such action it would be advisable for the ship to notify the Port State of the situation. However, before doing so the ship needs to be made aware of the failure of the system or the circumstances involved. Those causing the failure of the system or those involved in the prevailing situation should advise the ship accordingly if the duration of the failure is expected to exceed, for example 6 hours, and when the ship was being polled or is providing information on demand. Administrations should consider the issue and determine the maximum duration of such failure beyond which the ship would need to inform the Contracting Governments concerned.
- iii. In the case of Gibraltar registered ships the maximum duration of any failure before the Port State must be informed is 6 hours.
- iv. **11.3 - The question of imposition of any sanctions under the laws of the Contracting Government is an internal issue for the Contracting Government concerned. However, it is expected that Contracting Governments concerned should show a reasonable understanding of the circumstances.**

**b. ) MSC.1-Circ.1298 Annex Paragraph 12 - Ship undergoing repairs, modifications or conversions in dry-dock or in port or laid up for a long period**

**12.1** - Paragraph 4.4.1 of the Revised performance standards provides that when a ship is undergoing repairs, modifications or conversions in dry-dock or in port or is laid up for a long period, the master or the Administration may reduce the frequency of the transmission LRIT information to one transmission every 24-hour period, or may temporarily stop the transmission of such information.

**12.2** - Administrations should issue instructions to masters of ships entitled to fly their flag in relation whether they are authorized, and if so under what circumstances and on how they are able, to reduce, pursuant to the provisions of paragraph 4.4.1 of the Revised performance standards, the frequency of the transmission LRIT information or to temporarily stop the transmission of such information when a ship is undergoing repairs, modifications or conversions in dry-dock or in port or is laid up for a long period.

**12.3** - It should be noted that, depending on the duration of the suspension of the transmission of LRIT information, the apparent

savings to be realized may be less than the cost and charges incurred as a result of consequence in terms of communication services.

**12.4** It is highly advisable that, instead of suspending the transmission of LRIT information, to reduce the transmission rate to one every 24 hours and thus also leave the ship integrated in the LRIT system.

**17. This does not alter the Master's discretion to determine if transmitting LRIT information compromises the safety or security of his vessel and that LRIT transmissions should therefore be temporarily switched off in accordance with SOLAS Chapter V Regulation 19-1 paragraph 7.2.**

Alan Cubbin  
Maritime Administrator

Issue date: 28 July 2009

All notices are available through [www.gibmaritime.com](http://www.gibmaritime.com)

This copy of the Administrative Instruction has been sent electronically and does not carry a signature or official stamp. A sign and stamped copy will be available upon request