

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-359

- To:** Recognized Security Organizations (RSO's), Operators and Company Security Officer (CSO).
- Subject:** Guidance for the implementation and certification of the ISPS Code.
- Reference:** Law No. 7 of October 27, 1977 – adopted the Convention SOLAS. Resolution No. 106-107-DGMM of October 9, 2017. Implementation of SOLAS Chapter XI-2. International Ship and Port Facility Security (ISPS Code). Resolution MSC.198(80) of May 20, 2005.
Merchant Marine Circular: MMC-123; MMC-133; MMC-183; MMC-346; and MMC-399.
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This Merchant Marine Circular supersedes **MMC-368**.

A. PURPOSE:

The purpose of this Merchant Marine Circular is provides information and guidance to concerning the Administrations requirements for compliance with the International Ship & Port Facility Security Code (ISPS Code). It also contains the Administration's policies and interpretations regarding application and implementation of the ISPS Code.

B. SCOPE:

This Merchant Marine Circular applies all Panamanian flagged ships engaged on international voyage of 500 gross tonnages and upwards.

C. BACKGROUND:

The ISPS Code came into force in 2004, when it was passed as an amendment to the SOLAS (Security of Life at Sea) convention under chapter head IX-2.

1. APPLICABILITY OF THE ISPS CODE

1.1 The ISPS Code applies to all Panamanian flag vessels engaged on international voyages of 500 gross tonnages and upwards, as described in the MMC-123.



Merchant Marine Circular

1.2 For those Panamanian flag vessels operating in international jurisdictional waters or international coastal voyage must follow the national regulations of the country where it is operating, in order to comply with the ISPS Code.

2. RESPONSIBILITY OF THE COMPANIES OPERATOR

2.1 The Companies Operator shall designate a Company Security Officer (CSO) and must ensure which company security officer has the Declaration of the CSO duly endorsed by the Panama Maritime Authority, prior to carry out the initial, intermediate or renewal verification.

2.2 For vessel entering the Panamanian registry as of **January 1st, 2018**, must schedule the first annual SSAS Test through the use of the new platform, which **must be verified by their RSO during the initial verification** and from that date onwards, every 12 months the CSO should program the next SSAS test.

2.3 All Companies Operators should maintain a proper communication with the Recognized Security Organization (RSOs) to carry out all the ISPS verification during the established window of the ISPS Code Part/A 19.1.

2.4 The gaining society should endorse the existing ISSC in the corresponding window and its certificate will remain fully valid.

2.5 If for a special circumstance the ISPS verification cannot be completed within the established window in the ISPS Code Part A/19.1.1, the company operator should request a Flag authorization to postpone the ISPS verification prior to the expiration of the interim ISSC or prior to the expiration of due date of intermediate or renewal verifications window in the following website: <http://certificates.amp.gob.pa/certificates>.

2.6 The company operator must apply for the Full Term ISSC, after completed the initial or renewal verification, prior to expiration of the ISSC interim or short term ISSC (if applies).

3. RESPONSABILITIES OF THE COMPANY SECURITY OFFICER (CSO)

3.1 The Company Security Officer (CSO) is the direct contact point between the company and this Administration in matters related to the ISPS Code. In case of changes the CSO and/or the alternative CSO, the Ship Security Plans (SSP) must be amended accordingly the details on the new CSO and/or alternate CSO and must have the Declaration of the CSO duly endorsed by the Panama Maritime Authority (PMA) on board the vessel.

3.2 Apply for the Declaration of Company Security Officer (CSO) duly endorsed by the Panama Maritime Authority, prior to which the Recognized Security Organization (RSO) carried out the initial, intermediate or renewal verification (MMC-123).



Merchant Marine Circular

3.3 The CSO shall ensure that the Continuous Synopsis Record is requested one the ship is flagged.

3.4 Coordinate all the ISPS verification with the Recognized Security Organization (RSOs) within the established window of the ISPS Code.

3.5 Schedule an Annual SSAS Test (according MMC-133).

3.6 Ensure that the name of the CSO and contact details shall be identified in the Ship Security Plan (SSP).

4. RESPONSABILITIES OF THE RECOGNIZED SECURITY ORGANIZATIONS (RSOs).

4.1 All Recognized Security Organizations (RSOs) acting on behalf of the Panama Maritime Administration (listed in the MMC-131) should maintain a proper communication with the company operator and ensure to make all the necessary arrangements to complete all the ISPS verification during the established window in the ISPS Code Part/A 19.1 and should follow the instructions of this Merchant Marine Circular.

4.2 All Recognized Security Organizations (RSOs) must verify that the CSO designated by the Company Operator, already has the Declaration of Company Security Officer duly endorsed by the Panama Maritime Authority during the ISPS Initial, intermediate or renewal verification. In case there is no CSO declaration on board during the interim verification, the auditor must raise an observation in order for the company operator to request the CSO, according to the (MMC-123).

4.3 Verify that the vessel has a Continuous Synopsis Record (CSR) updated, prior to complete the ISPS verification and the auditor must indicate the number and date of issuance of the Continuous Synopsis Record (CSR) in the Audit Report. In case there is no CSR on board, the auditor must raise an observation in order for the company operator to request the CSR, according to the (MMC-183).

4.4 Check that the SSAS equipment is already configured to the following email account threat@amp.gob.pa, according to the MMC-133.

4.5 We request all RSO verify the confirmation of the Annual SSAS Test issued by the Flag during the initial, intermediate y/o renewal verification and from that date onwards, every 12 months the CSO should schedule the next SSAS test.

4.6 For the change of Recognized Security Organization (RSO), it will be necessary notify this Administration isps@amp.gob.pa and the gaining society must complete the Notification form for Transfer of ISPS Certification, prior to carry out the verification.



Merchant Marine Circular

4.7 The gaining society should endorse the existing ISSC in the corresponding window and it certificate will remain fully valid.

4.8 The RSO which carried out the intermediate verification must submit as soon as possible and no later than 30 days from the date of the audit report, a copy of the ISSC duly endorsed and audit report should be send to us at the following email: isps@amp.gob.pa. (Note: Failure to comply with this requirement will be considered a bad practice).

4.9 When an interim ISSC is suspended or withdrawn by the Recognized Security Organization (RSO) it must be inform to the following email address: isps@amp.gob.pa

4.10 When a Conditional Certificate is issued by the Recognized Security organization (RSO), as established in the item 11.4 of this MMC it must be send copy to the following email address: isps@amp.gob.pa

4.11 For the invalidation of the Full Term ISSC, the Recognized Security Organization (RSO) must send us the notification of invalidation to the following email address: isps@amp.gob.pa, in order to this Administration to proceed on cancelling the Full Term ISSC in our system.

5. RESTRICTIONS OF THE RECOGNIZED SECURITY ORGANIZATION (RSO´s)

5.1 All Recognized Security Organization (RSO) acting on behalf of the Panama Maritime Administration should not by any circumstance:

- Issue a consecutive interim ISSC (without authorization)
- Issue a short-term certificate after carried out the initial verification
- Issue the Full Term ISSC
- Issue the Interim ISSC if a Mayor-Nonconformity was found during the ISPS verification and compromise the vessel ability to operate at security levels 1, 2 or 3.
- Set the applicable security level

6. THE ISPS AUDIT REPORT SHOULD AT LEAST CONTAIN THE FOLLOWING INFORMATION:

6.1 Each vessel in which Part A of ISPS Code applies shall be subject to verification specified in section 19.1 Part A of the ISPS Code.

6.2 The report should include at least the following information:

- Place and date of ISPS verification
- Identification of the audit team
- Type of verification (interim/initial/intermediate/renewal/additional)



Merchant Marine Circular

- Audit plan
- Company security officer (CSO) name
- Identification of SSO
- Number and date of issuance of the latest CSR
- Annual SSAS Test date
- Any observations and possible required action
- Recommendations
- Conclusion

6.3 If the Recognizes Security Organization (RSO) found mayor non-conformity on board during the ISPS verification and compromises the security of the vessel, cargo or the crew it should be documented and reported to the CSO and to the Maritime Ship Security Department at the following email: isps@amp.gob.pa.

6.4 Any failure of security equipment or systems, or suspension of a security measure that does not compromise the ship's ability to operate at security levels 1 to 3 shall be reported without delay to the Maritime Ship Security Department with details of the equivalent alternative security measures the vessel is applying, until the failure or suspension is rectified together with an action plan specifying the timing of any repair or replacement.

7. TYPES OF ISPS VERIFICATION AUDIT

7.1 Interim Verification: short period allowed for implementation on board newly operated vessels, where the Recognized Security Organization must verify vessel's compliance with provisions of the ISPS Code A/19.4.2.

7.2 Initial Verification: when the vessel is in compliance with all the ISPS requirements the section 19.1, or before the required certificate under section 19.2 is issued for the first time.

7.3 Intermediate Verification: is carried out between the dates of second and third anniversary of the issuance of the Full Term ISSC, according to the ISPS Code Part A, Rules 19.1.1.3.

7.4 Renewal verification: renewal verification audits shall take place at intervals not exceeding five (5) years and should be carried out within three (3) months before or after the expiring date of the certificate.

7.5 Additional Verification: shall be conducted at request of this Administration, Port State Control Authorities and at any case described in the item 14.

Merchant Marine Circular

8. TYPES OF ISSC CERTIFICATES

8.1 Interim ISSC: A certificate that may be issued after 1st July 2004, to a vessel which has newly joined under management of a Company, or which has changed Flag. This certificate must identify with the nomenclature “Interim” and the validity should not to exceed more than six (6) months. The Interim ISSC shall be issued in a form corresponding to the template given in the Appendix 2, of the ISPS Code.

8.2 Full Term ISSC: Full term ISSC shall be issued only by the Panama Maritime Authority (PMA) after the vessel has successfully completed an initial or renewal verification in compliance with the applicable requirements of Chapter XI-2, ISPS Code Parts A, relevant provisions of Part B and additional flag requirements, for a period of up to five (5) years from the date of successful completion of the initial or renewal verification Audit. During this time the original certificate must remain on board the vessel.

8.3 Short Term ISSC: A certificate issued after renewal verification audit. This certificate must be identified with the nomenclature “**Short Term**” when applies and the validity should not exceed more than five (5) months.

8.4 Conditional Certificate: A certificate issued by the Recognized Security Organization, with previous authorization of the Administration in those exceptional cases that will be evaluated by the Maritime Ships Security Department case-by-case basis. The Conditional Certificate may issue with a validity date not exceeding ninety (90) days and this particular certificate shall be identified by the nomenclature “**Conditional Certificate**” and the RSO should send us copy of this certificate at the following email: isps@amp.gob.pa and ro-monitoringfees@segumar.com.

9. ISPS CERTIFICATION

9.1 The interim ISSC only will be issued if the RSO previously verified that the vessel is in compliance with provisions of the ISPS Code **A/19.4.2** and for the following purposes:

- A vessel without a certificate, on delivery or prior to its entry or re- entry into service
- When a vessel without a certificate, on delivery or prior to its entry or re-entry into service
- For a Change of Flag
- When a Company newly commences management of the vessel

9.2 The initial verification must be carried out within the period of validity of the interim certificate, in compliance with provisions of the ISPS Code A/19.1.1.



Merchant Marine Circular

9.3 This Administration does not authorize the issuance of a **SHORT-TERM CERTIFICATE** or a consecutive **INTERIM ISSC** after having the initial verification taken place.

9.4 Once the **INITIAL VERIFICATION** has been carried out, the operator company must apply for the issuance of the Full Term ISSC, through the website: <http://certificates.amp.gob.pa/certificates>, only issued by the Panama Maritime Authority.

9.5 Starting January 1st, 2020, the Panama Maritime Authority (AMP) will issue the International Ship Security Certificate (Full Term ISSC) with the same type of vessel as indicated in the Safety Management Certificate (SMC) issued by the RO.

(*) Insert the type of ship from among the following: passenger ship, passenger high-speed craft; cargo high-speed craft; bulk carrier; oil tanker; chemical tanker; gas carrier; mobile offshore drilling unit; other cargo ship.

10. INTERMEDIATE VERIFICATION

10.1 During the validity of the Full Term ISSC at least one intermediate verification will be performed, between the dates of the second and third anniversary of the issuance of the Full Term ISSC, according to the ISPS Code Part A, Rules 19.1.1.3.

10.2 The Company Security Officer, or Company Operator shall contact the Recognized Security Organization (RSO) who carried out the initial verification on which the full term ISSC is based, to carry out the intermediate verification on board within the established window and the surveyor or auditor must endorse the verification in the existing ISSC.

10.3 In case a Ship-owner or Company Operator decides not to use the RSO that performed its initial verification (for the purpose of getting an intermediate verification), it will be necessary to notify this Administration isps@amp.gob.pa and the gaining society must complete the following document for the change of RSO, prior to carry out the verification and follow the instructions indicated in the [\(ANNEX 1\)](#).

10.4 The Recognized Security Organization which performing the intermediate verification must submit as soon as possible but no later than 30 days from dates of verification the following documents at: isps@amp.gob.pa (Copy of the Full Term ISSC duly endorsed in the corresponding space and Audit Report).



Merchant Marine Circular

11. RENEWAL VERIFICATION

11.1 The renewal verification audits shall take place at intervals not exceeding five (5) years, if the renewal verification is completed within three months before the expiry date of the existing certificate, the new certificate shall be valid from the date of completion of the renewal verification to a date not exceeding five years from the date of expiration of the existing certificate.

11.2 When the renewal verification is completed after the expiry date of the existing certificate, the new certificate shall be valid from the date of completion of the renewal verification to a date not exceeding five years from the date of expiry of the existing certificate.

11.3 When the renewal verification is completed more than three months before the expiry date of the existing certificate, the new certificate shall be valid from the date of completion of the renewal verification to a date not exceeding five years from the date of completion of the renewal verification.

11.4 The Recognized Security Organization may issue a SHORT TERM ISSC, after performing the renewal verification or endorse the existing certificate and such certificate shall be accepted as valid for a further period which shall not exceed five (5) months from the expiry date, in order for the company operator must apply for the Full Term ISSC, before the expiration of the Short Term ISSC or endorsement of the existing Full Term ISSC.

12. PROCEDURES TO REQUEST AUTHORIZATION TO POSTPONE ONLY ISPS VERIFICATION AUDIT

12.1 If for a special circumstance the ISPS verification (Initial, Intermediate or Renewal Verification) cannot be completed within the established window as indicated in the ISPS Code Part A/19.1.1, the operator company, owners, recognized security organization or legal representatives should request an authorization to postpone the verification audit prior to the expiration of the interim ISSC or prior to the expiration of due date of the intermediate or renewal verifications window through the online platform E-Segumar at the following website <https://certificates.amp.gob.pa/certificates/> selecting the ISPS authorization option and shall submit the following documents:

- Statement issued by the RSO indicating the reason for not performing the verification and stating the exact date and place where the ISPS Verification will take place.
- Interim ISSC only if the extension requested is due to the initial verification
- ISSC Full term fully endorsed or intermediate verification report if the extension requested is to carry out the renewal verification.



Merchant Marine Circular

12.2 Once the verification is done, the Recognized Security Organization should send us a copy of the report to the following email: isps@amp.gob.pa.

- ISPS Audit Report
- Copy of the ISSC with endorsement when is applicable

12.3 This authorization will be granted for a period no longer than (90) days and this Administration does not authorize to issuance of a second interim ISSC after granting an ISPS authorization.

13. AFTER CARRIED OUT THE ISPS VERIFICATION, PLEASE PROCEED ACCORDING TO THE

FOLLOWING SCENARIOS:

13.1 If the extension was granted to postpone the Initial Verification, the Company Operator must apply immediately for the Full term ISSC, prior to the expiration of the ISPS authorization granted through the online platform E-SEGUMAR.

13.2 If the extension was granted to postpone the Intermediate Verification, the RSO must endorse the existing ISSC and shall indicate the authorization number granted, which authorizes them to carry out the intermediate verification out of time frame.

13.3 If the ISPS extension was granted to postpone the Renewal Verification, the RSO may issue a short-term certificate, valid for 5 months, after performed the renewal verification.

13.4 If for any circumstance the verification cannot be completed during the period granted, the user must to request another authorization prior to the expiration date, in order to be granted by the same office that issued the previous one (reference item 10.1).

14. ADDITIONAL AUDIT AUTHORIZATION

14.1 **Starting January 1st, 2020**, this Administration inform all Recognized Security Organizations (RSOs) that will not be necessary request an authorization to carry out the additional audit for the following cases:

- Change of vessel name
- Change of tonnage
- Change of type of vessel
- (*) PSC detention (it will be necessary send us the PSC report and Audit report immediately) at isps@amp.gob.pa
- Flag State detention



Merchant Marine Circular

14.2 For those cases it will be necessary request an additional authorization through the following website <http://certificates.amp.gob.pa/certificates>

- For single voyage
- For close Non-conformities
- SSAS Malfunction authorization
- For SSAS replacement equipment

14.3 The Full Term ISSC shall be endorsed upon successful completion of the additional audit by the Recognized Security Organization (RSO).

15. TRANSFER OF SECURITY MANAGEMENT SYSTEM CERTIFICATION (CHANGE OF RSOs)

15.1 Starting January 1st, 2020 all Recognized Security Organizations (RSOs) should notify the change of RSO to this Administration isps@amp.gob.pa and complete the [Notification form for Transfer of ISPS Certification](#).

15.2 After the vessel has successfully completed the verification, the surveyor or auditor must endorse the existing ISSC on board and it will not be necessary to reissue the certificate by the Panama Maritime Authority.

15.3 It will be necessary that the Recognized Security Organization send us copy of the audit report and the ISSC duly endorsed to the following email isps@amp.gob.pa, in order to update the new Recognized Security Organization (RSO) responsible of the ISPS certification on board.

15.4 If the transfer of Security Certification occurs during the annual, intermediate or renewal window, the RSO should proceed according to the provisions described in the [\(ANNEX 1\)](#), please refer below.

16. SHIP OUT OF SERVICE MORE THAN SIX (6) MONTHS (RE-ENTRY INTO SERVICES)

16.1 If the ship is out of service for more than six months, an interim verification as required by the ISPS Code A/19.4.2 and follow the instruction described in the [\(ANNEX 1\)](#), refer below.

17. HARMONIZATION OF ISM/ISPS CERTIFICATION

17.1 The harmonized ISM/ISPS audit reduces the number of auditor/inspector visits onboard which saves valuable time and personnel resources while still ensuring regulatory compliance. This Administration recognizes the harmonization system.



Merchant Marine Circular

17.2 Upon successful completion of the harmonized audit, the SMC and ISSC will be issued with the same issuance and expiry dates and the company operator must apply for the Full Term ISSC, according to the provisions described in the [ANNEX 1](#), please refer below.

18. CHANGES DURING THE VALIDITY OF THE INTERIM ISSC

18.1 The RSO shall issue an interim ISSC with the same validity as the existing certificate if the vessel changes any of the following information:

- When the name of vessel changes
- When the tonnage changes
- When the physical address of the operator company changes
- When the name of the operator company changes
- When the type of vessel changes

19. CHANGES DURING THE VALIDITY OF THE FULL TERM ISSC

19.1 If the vessel changes any of the following information below described during the validity of the Full Term ISSC the RSO shall issue a short term ISSC valid for (5) months and afterwards this Administration will issue the Full Term ISSC with the same validity as the existing certificate. When the following conditions are given:

- When the name of vessel changes
- When the tonnage changes
- When the physical address of the operator company changes
- When the name of the operator company changes
- When the type of vessel changes

20. NOTIFICATION OF INVALIDATION OF ISSC CERTIFICATE

20.1 The Interim ISSC may only be invalidated at the determination of the RSO and the Full Term ISSC will only be canceled by the Panama Maritime Authority (PMA), through the notification of invalidation sent to this Administration isps@amp.gob.pa.

20.2 An existing certificate shall become invalid when, but is not limited to, the following deficiencies:

- When a vessel has not undergone the periodical audit (initial, intermediate or renewal verification).
- When a Company cease managing the ship
- When a ship changes her Flag



Merchant Marine Circular

- When an ISSC is issued to replace an interim ISSC
- When a Company requests withdrawal of the ship from the ISPS Register.
- A part of the SSP which requires approval upon amendment has been amended without approval
- Corrective actions for non-compliance set out at the audit have not been completed within the agreed period of time
- When a vessel is not operated in compliance with the rule requirements
- The vessel failure to maintain its Ships Security Plan in compliance with the requirements of the ISPS Code
- Any other notification of invalidation described by the RSO.

21. ISSC REVALIDATION FOR REFLAGGING

21.1 For those cases when the vessel is cancelled from the Panamanian Registry and immediately reflag again, the company operator must request the reissue the Full Term ISSC again through the E-Segumar platform, selecting the option ISSC **revalidation for Reflagging**. It should be noted that the new certificate will be evaluated and processed by the Maritime Ships Security Department in Panama.

21.2 It is worth noting that the previous certificate will become invalid once the vessel is cancelled from the registry automatically. For this reason, the company operator must apply immediately for the reissue of the Full Term ISSC; to more reference you can see the Annex 1 below of this Merchant Marine Circular.

22. SSAS EXEMPTION CERTIFICATE

22.1 Starting from the November 1st, 2019, the SSAS exemption must be requested through the following website link <http://certificates.amp.gob.pa/certificates>, and the following documents will be submitted and for further reference please see the MMC-123.

- RSO statement with the alternative security measures on board
- A formal statement by the Coastal State about vessel operational area
- Interim ISSC
- Payment Receipt (US\$300.00 no handling fee is applicable)

23. PRINTING GUIDANCE FOR ISSC CERTIFICATE AND ISPS AUTHORIZATION

23.1 International Ship Security Certificate (ISSC) shall be printed out in a dual page (letter size (8.5"X11") or A4 size if letter size is not available) and remain onboard. They should be printed in black and white or colors.



Merchant Marine Circular

23.2 ISPS Authorization shall be printed out in a single page (letter size (8.5"X11") or A4 size if letter size is not available) and remain onboard. They should be printed in black and white or colors.

23.3 SSAS exemption certificate shall be printed out in a single page (letter size (8.5"X11") or A4 size if letter size is not available) and remain onboard. They should be printed in black and white or colors.

NOTE: FOR ISPS CERTIFICATION GUIDANCE (SCENARIOS) AND REQUIEREMENTS FOR THE ISSUANCE OF THE FULL TERM ISSC, PLEASE REFER TO THE [ANNEX 1](#).

June, 2024 – Elimination of paragraph 17, regarding overdue verification and paragraphs were numbered.

September, 2023 – Restructuration of all Circular.

May, 2021 – Inclusion in the reference and replacement the Annex 1 - paragraph 17.4 and 26 (note).

February, 2021 – New paragraph 7.11, 11.4, 15.1 and 26, the paragraphs were numbered.

May, 2020 – New paragraph 25 and the paragraphs were numbered.

December 2019 – Modification of the item 9.2 and item 5, 9, 12 and 17 of the Annex 1.

October 2019 – Change of the MMC subject and Restructuring of the numerical sequence and modification paragraph 8,9, 10, 11,12,13,14.

June 2019 - Including Annex of Application for SSAS Exemption Certificate.

March, 2019 - Modification of paragraph 7 and 9 and new paragraph 9.1, 14, 20.1 and 21.

January, 2019 - Inclusion of paragraphs 19 and 20.

December, 2018 - modification of paragraph 18 point 4.

December, 2018 - Modification and new paragraphs of item 11, 17 and 19.

February, 2018 - inclusion of new paragraphs 2.10, modification of item 8 to 9 and 12.

November, 2017.

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

Maritime Ships Security Department
General Directorate of Merchant Marine
Panama Maritime Authority

Phone: (507) 501-5037/501-5085

E-mail: isps@amp.gob.pa

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