

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-379

To: Recognized Organizations (RO's), Ship-owners/Operators, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates, Segumar Regional Offices, ASI Inspectors, Port State Control Inspectors, Shipping Companies and other flag customers.

Subject: Procedure for Port State Control (PSC), 2025 amendments.

Reference: Resolution A.1206(34) Procedures for Port State Control, 2025.
Resolution No.107-OMI-320-DGMM of March 23, 2026 adopted Resolution A.1206(34).

1. Purpose

1.1 This Merchant Marine Circular informs that the IMO Resolution A.1206(34) was adopted on 3 December 2025, updating the Procedures for Port State Control Inspections, providing basic guidance on the conduct of port State control inspections in support of the control provisions of relevant conventions and parts of the IMO Instruments Implementation Code (III Code) (Resolution A.1070(28)) and afford consistency in the conduct of these inspections, the recognition of deficiencies of a ship, its equipment, or its crew, and the application of control procedures.

1.2 The overview of the significant changes in Port State Control (PSC) inspections. Resolution A.1206(34) shifts the focus from purely administrative compliance to operational effectiveness and environmental accountability.

2. Scope

This Merchant Marine Circular provides an overview of the principal amendments introduced by IMO Resolution A.1206(34) to the Procedures for Port State Control (PSC) inspections and their implementation.



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3. Significant Changes

3.1 Maritime Security (ISPS Code) – Expanded Scope (NEW) Appendix 20

Introduces a formal procedural basis for PSC to record security-related deficiencies. Enforcement: PSCOs are now authorized to take action not only for missing paperwork but where security arrangements are ineffective in practice. Significant failures in security implementation can now lead to vessel detention.

3.2 LRIT Compliance – Elevated Risk

LRIT deficiencies are no longer treated as minor administrative issues. A vessel is now explicitly liable for detention if:

- It lacks a valid LRIT Conformance Test Report.
- The Master or responsible officers are unfamiliar with LRIT operational procedures.

3.3 MARPOL Annex VI & Decarbonization

PSC enforcement has been strengthened to align with IMO's 2030/2050 targets. Detainable items now include:

- Absence of valid EEXI (Energy Efficiency Existing Ship Index), SEEMP (Ship Energy Efficiency Management Plan), or CII (Carbon Intensity Indicator) statements.
- Fuel: SOx non-compliance in ECAs and use of non-compliant fuel without permitted exemptions.
- Failure or improper operation of Exhaust Gas Cleaning Systems (EGCS/Scrubbers) and non-compliant shipboard incinerators.

3.4 Human Element: Competence as a Compliance Pillar

A core theme of A.1206(34) is that equipment presence does not equal compliance.

- PSC inspections will increasingly focus on crew familiarization.
- If a crew member cannot demonstrate proficiency in operating safety or environmental systems (e.g., OWS, LRIT, Scrubber monitoring, etc), the vessel may be detained regardless of whether the hardware is functional.

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3.5 Reclassification of Detention Grounds

To provide PSC Officers (PSCOs) with clearer legal standing for interventions, several critical items have been relocated to Appendix 2 (Guidelines for the Detention of Ships). The following are now primary targets for vessel detention:

- ISM Code (App. 8, para. 7): Technical or operational failures that indicate a lack of effective Safety Management System (SMS) implementation.
- LRIT (App. 9, para. 4.2): Failures in Long-Range Identification and Tracking.
- STCW (App. 11, para. 7.3): Lack of valid certification or evidence of endorsement applications for crew members.
- MARPOL Annex VI (App. 18, para. 2.7): Serious non-compliance with air pollution prevention standards.
- IBC/IGC Codes: Gas detection defects, compromised cargo containment/ventilation, or missing inhibitor certificates.

July, 2026 – Updated the Merchant Marine Circular to adopt IMO Resolution A.1206(34) (Procedures for Port State Control, 2025) by means of Resolution No. 107-OMI-320-DGMM of March 23, 2026. This revision includes updates to the Subject and References, the incorporation of a new Scope section, and a general revision and restructuring of the circular to align it with the new IMO requirements.

July, 2024 - Adoption of Resolution A.1185(33) of December 6, 2023 - Procedures for Port State Control, 2023 by means of Resolution No.107-OMI-289-DGMM of May 11, 2024.

May, 2022 - Adoption of Resolution A.1155(32) Procedures for Port State Control, 2021 by means of Resolution No.107-OMI-233-DGMM of March 07, 2022.

June, 2020 - Adoption of Resolution A.1138(31) Procedures for Port State Control, 2019 by means of Resolution No.107-OMI-252-DGMM of May 18, 2020.

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