

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-270

- To:** Ship-owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates and Recognized Organizations (ROs).
- Subject:** Fishing Vessels and other ships engaged in fishing related activities.
- Reference:** Law No. 38 of June 4th, 1996.
Law No. 44 of November 23rd, 2006.
Law No. 57 of August 6th, 2008.
Law No. 204 of March 18th, 2021.
Executive Decree No. 245 of November 21st, 2022.
Executive Decree No. 13 of November 1st, 2023.
Executive Decree No. 512 of October 18th, 2024.
Resolution No. 107-OMI-204-DGMM of May 27, 2019.
Resolution No. 106-077-DGMM of August 9th, 2023.
Resolution No. 106-048-DGMM of August 19, 2019.
Circular Letter 2554, Rev. 4 March 8, 2023.

This merchant Marine Circular replaces **MMC-400**.

1. Purpose:

The purpose of this Merchant Marine Circular is to inform the requirements applicable to fishing vessel and other ships engaged in fishing related activities registered under Panama flag, according to the responsibilities of the national authorities related to this issue.

2. Scope:

This Merchant Marine Circular applies to any Panamanian-flagged vessel engaged in fishing and fishing related activities.

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According to the FAO “fishing related activities” means any operation in support of, or in preparation for, fishing, including the landing, packaging, processing, transshipping or transporting of fish that has not been previously been landed at a port, as well as the provisioning of personnel, fuel, gear and other supplies at sea and/or logistical support.

With regards to vessels provisioning of personnel, fuel, gear and other supplies at sea flying Panamanian flag the General Directorate of Merchant Marine will enforce the reporting of transshipment to fishing vessels.

3. Index:

1. Panama Aquatic Resources Authority (ARAP) legal framework;
2. Panama Maritime Authority legal framework;
3. Vessel's requirements:
 - 3.1. IMO Number;
 - 3.2. VMS, LRIT and AIS on board;
 - 3.3. Enforcement.
 - 3.4 Sanctions

3.1 Panama Aquatic Resources Authority (ARAP) legal framework

- 3.1.1 By Law No. 44 of November 23, 2006, the Aquatic Resources Authority of Panama was created as the State's governing body to ensure compliance with and application of national laws and policies on fishing and aquaculture, and establishes among its functions, to regulate, promote and apply technical and administrative measures and processes for the rational, sustainable and responsible use of aquatic resources; and to comply with and enforce international agreements that have been signed by the Republic of Panama.
- 3.1.2 Every Panamanian flagged vessel dedicated to the capture or activities related to fishing, outside the jurisdictional waters of Panama, must have a valid International Service Commercial Fishing License issued by the Panama Aquatic Resources Authority (ARAP) in accordance with Law No. 204 of 18 March 2021 and Executive Decree No. 13 of November 1st, 2023.
- 3.1.3 The Panama Aquatic Resources Authority (ARAP) will issue two categories of international fishing license:
 - a) International Service Commercial Fishing License for capture.



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- b) International Service Commercial Fishing License for fishing-related activities related to fishing.

3.1.4 Furthermore, according to Executive Decree No. 13 of November 1st, 2023, ARAP will issue a Non-Objection Letter to newbuild or existing fishing vessel or ships intending to engage in activities related to fishing.

3.1.5 For more information about the requirements visit <https://arap.gob.pa/>.

3.2 Panama Maritime Authority legal framework

3.2.1 Law No. 57 of August 6, 2008, establishes that the Panama Maritime Authority through the General Directorate of Merchant Marine, is the competent entity to execute the administrative acts related to the registration of vessels in the National Merchant Marine, to authorize changes in such registration and to resolve its loss for the causes indicated in the law.

3.2.2 According to ARAP legal framework (paragraph 3.1.4) as an essential requirement to obtain the provisional registry certificate newbuild or existing fishing vessel or ships intending to engage in activities related to fishing must present a Non-Objection Letter issued by the ARAP when requesting for:

1. Registration,
2. Change of ownership,
3. Change of service.

A Provisional Registry Certificate will be valid for the same validity period of the Non-Objection Letter.

3.2.3 Once the fishing vessel or ships intending to engage in activities related to fishing is registered under Panama and before engaging such activities, it must request from ARAP the issuance of the International Service Commercial Fishing License in accordance with the provisions of Executive Decree No. 13 of November 1, 2023.

3.2.4 Vessels provisioning of personnel, fuel, gear and other supplies at sea such as reefers, oil tankers and supply vessels not engaged in fishing related activities must submit to the Merchant Marine Directorate a [Sworn Declaration and Operational Disclaimer](#) (F-167) that the vessel is not engaged in support of, or

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in preparation for, fishing, including the landing, packaging, processing, transshipping or transporting of fish that has not been previously been landed at a port.

3.2.5 The following type of vessels of less than 70,000 GT, including but not limited to, shall submit the [F-167](#) described in section 3.2.4 are:

- Anchor Handling Tug / Supply Vessel
- Container And Multi-Purpose Cargo
- Crew Boat
- Crew Boat / Workboat
- Factory Vessel
- Fast Utility Boat
- Fish Cargo / Freezer
- Fish Carrier
- Fish Factory Vessel
- Fishing Support Vessel
- Fishing Vessel / Fish Transport Vessel
- High-Seas Support Vessel
- Live Fish Transport
- Multi-Purpose / General Cargo
- Multi-Purpose Container Vessel
- Multi-Purpose Dry Cargo Vessel
- Multi-Purpose Vessel
- Multi-Purpose Vessel (Container / General Cargo)
- Offshore Supply
- Offshore Supply Vessel
- Offshore Support Vessel
- Offshore Support, Towing, Anchor Handling and Firefighting Vessel
- Offshore Tug, Supply, And Service Vessel
- Oil Tanker
- Petroleum Product Tanker
- Platform Supply - Dynamic Positioning 2
- Processing Vessel
- Refined Petroleum Product Tanker
- Refined Product Tanker
- Refrigerated Cargo
- Supply
- Supply / Multi-Purpose
- Supply / Support
- Supply / Tug
- Supply / Utility Workboat
- Supply And Crew Vessel
- Supply Vessel
- Supply Vessel / Workboat
- Support Vessel
- Tanker
- Tanker Of Diesel
- Tug / Supply Vessel
- Utility And Crew Vessel
- Utility Vessel
- Workboat

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3.2.6 Panamanian fishing vessels that enter into a bareboat charter contract lease of a ship, for a stipulated period of time, which involves its temporal registration to another flag, but maintaining the Panama flag as first flag of registry shall request an Authorization to the Panama Aquatic Resources Authority for International Charter Fishing Service.

3.2.7 The International Registry Certificate or any other document issued by the Panama Maritime Authority shall not be construed as an authorization to engage in fishing or activities related to fishing, nor shall it replace the International Service Commercial Fishing License issued by ARAP whenever such license is required under the applicable legislation.

3.3 Vessel's requirements

3.3.1 IMO number

3.3.1.1 Any fishing vessel or vessels carrying out fishing related activities registered under the Panama flag must comply with the provisions of Resolution A.1117(30) "IMO ship identification number scheme", dated December 6, 2017 adopted by Panama through Resolution No. 107-OMI-204-DGMM of May 27, 2019.

3.3.1.2 In order to obtain an "IMO number", for both new and existing vessels, please visit the website <http://imonumbers.ihs.com> or send your request to the Email: ship.imo@ihsmarkit.com, refer to [Circular Letter No.1886, Rev. 7 November 28, 2022](#).

3.3.1.3 For Implementation of the IMO unique company and registered owner Identification number scheme requirement, please refer to MMC-151 and IMO [Circular Letter 2554, Rev. 4 March 8, 2023](#).

3.3.2 VMS, LRIT and AIS on board

3.3.2.1 VMS: Any Panamanian-flagged **fishing vessel or ships intending to engage in activities related to fishing is registered** must comply with the use of the Satellite Communication Equipment (VMS) according with the articles 140 to 146 of the Executive Decree No. 13 of November 1st, 2023 of the Panama Aquatic Resources Authority.

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3.3.2.2 LRIT and/or AIS: Any Panamanian-flagged **fishing vessel** holding an International Registry Certificate navigating high seas or within jurisdictional waters of the Republic of Panama, must comply with the use of Automatic Identification System (AIS) equipment and/or Long-range Identification and Tracking System (LRIT) equipment as positioning systems.

3.3.2.3 AIS and LRIT: Any Panamanian-flagged **ships intending to engage in activities related to fishing is registered** holding an International Registry Certificate navigating high seas or within jurisdictional waters of the Republic of Panama, must comply with the use of Automatic Identification System (AIS) equipment and Long-range Identification and Tracking System (LRIT) equipment as positioning systems.

3.3.2.4 Any Panamanian-flagged fishing vessel and/or engaged in fishing-related activities fitted with the Long-Range Identification and Tracking System (LRIT) equipment must perform the Conformance Test Report in accordance with the provisions of Merchant Marine Circular MMC-195 and reporting requirement is of at least six (6) position reports per day.

3.3.2.5 The use and fitting of Automatic Identification System (AIS) equipment is mandatory for vessels subject to SOLAS Convention 74/88 Chapter V Regulation 19 paragraph 2.4, of with the following characteristics:

1. All ships of 300 gross tonnage and upwards engaged on international voyages.
2. Cargo ships of 500 gross tonnage and upwards **not** engaged on international voyages.
3. Passenger ships irrespective of size.

This provision applies only to those Panamanian-flagged fishing vessels described in paragraph 3.3.2.2.

3.3.2.6 This Administration shall be informed immediately in cases where the captain considers that the continued operation of the Automatic Identification System (AIS) and/or the Long-Range Identification and Tracking System (LRIT) equipment could affect the safety of the vessel, according to the provisions given through the MMC-195.

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3.3.2.7 Any Panamanian-flagged vessel that maintaining AIS and/or LRIT equipment on board and presenting failures in such equipment, shall comply with the provisions establishes in the MMC-195 and request through the E-Segumar Platform the authorization. In case the equipment will be switched off must report manually to monitoringfleet@amp.gob.pa in accordance with the provisions given through the MMC-195.

3.3.3 Enforcement

3.3.3.1 The General Directorate of Merchant Marine will order the definitive cancellation of any vessel when it, its owner, shipowner, operator, charterer, captain, ultimate beneficiary owner, or any other natural or legal person related to it, has carried out Illegal, Unreported and Unregulated Fishing activities, has made a transfer, relationship, association and/or connection with vessels, natural or legal persons related to these illegal activities, upon request by ARAP, and/or when it has been included in sanction lists.

3.3.3.2 Panamanian-flagged fishing vessels with an International Service Commercial Fishing License that has expired, suspended, or been cancelled by the ARAP will be cancelled from the Panamanian registry, upon request by ARAP.

3.3.3.3 Panamanian flagged vessels are prohibited from carrying out or performing transfer operations or logistical support with vessels that have been included in official lists of vessels sanctioned for illegal, unreported, and unregulated (IUU) fishing activities (<https://iuu-vessels.org/>). Failure to comply with this provision will result in the application of the sanctions established in current regulations.

3.3.3.4 Panamanian-flagged vessels engaged in fishing, fishing-related activities and not reporting their positions through the Automatic Identification System (AIS) and/or the Long-Range Identification and Tracking System (LRIT) equipment will be sanctioned and/or cancelled from the Panamanian registry in accordance with the provisions of established in the Resolution No. 106-077-DGMM of August 9, 2023.

3.3.3.5 Additionally, it is hereby informed that, as notified through Marine Notice No. [MMN-03/2026](#), a temporary suspension of fishing and fishing-related activities carried out by Panamanian-flagged vessels within the NEAFC

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Convention Area has been established for the year 2026. Consequently, all vessels, ship-owners, operators, and stakeholders shall refrain from conducting such activities in said area, in strict compliance with applicable international provisions and the measures adopted by the Aquatic Resources Authority of Panama (ARAP).

3.3.3.6 Based on the Decree No. 3 dated September 22, 2015, as amended by Decree No. 138 dated June 8, 2021, issued by the Ministry of Environment (MiAmbiente), it is prohibited to carry out activities that contravene the special protection regime of the Cordillera de Coiba Managed Resources Area. Consequently, within the limits of this area, different operational activities, such as anchoring, prolonged stays, fuel transfer, transfer of oil cargo between oil tankers (STS operations), bunkering, provisioning, stationary operations, or logistical maneuvers, unauthorized fishing activities, dumping or discharges of polluting substances and any other activity incompatible with the conservation objectives established in the current regulations that may generate a risk of direct or indirect pollution, physical disturbance of the seabed, sediment removal, damage to benthic habitats, or alteration of natural ecosystem functions are prohibited.

The geographical coordinates that delimit the Cordillera de Coiba Managed Resources Area are:

Name	Description of restrictions for each area	Coordinates or shapefile	
		Longitude	Latitude
Cordillera de Coiba Managed Resource Area	Fishing with nets of any kind or longlines is prohibited.	06° 30' 05.69824363" N	083° 36' 53.02360104" W
		06° 30' 06.00000033" N	080° 16' 11.99999821" W
		05° 00' 05.28900076" N	080° 16' 11.99999821" W
		05° 00' 05.28900076" N	084° 18' 59.88799730" W
	Discharging ballast water and the exploration or exploitation of mineral and oil deposits are prohibited.	06° 30' 05.73350936" N	083° 13' 25.80320637" W
		05° 52' 32.76708723" N	083° 13' 25.80320637" W
		05° 52' 32.76708723" N	080° 16' 11.99999821" W
Banco Volcán Managed Resource Area	Industrial fishing and fishing with nets of any kind are prohibited.	82° 10' 29.909" O	10° 0' 0.000" N
		81° 26' 7.763" O	10° 49' 4.301" N
		81° 14' 59.541" O	11° 0' 4.271" N
		79° 59' 59.401" O	11° 0' 4.267" N
		79° 59' 59.397" O	11° 50' 4.133" N
	Any activity that directly or indirectly pollutes the protected area is prohibited.	78° 59' 59.284" O	11° 50' 4.128" N
		78° 59' 59.280" O	12° 30' 4.023" N
		77° 59' 59.166" O	12° 30' 4.017" N
		77° 48' 59.146" O	12° 19' 4.045" N
		77° 42' 59.137" O	12° 0' 4.095" N

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		77° 33' 59.124" O	11° 27' 4.182" N
		77° 14' 59.095" O	10° 28' 4.338" N
		77° 9' 27.727" O	10° 0' 0.000" N
		80° 11' 15.000" O	10° 0' 0.000" N
		80° 11' 15.000" O	9° 26' 15.000" N
		80° 56' 15.000" O	9° 26' 15.000" N
		80° 56' 15.000" O	10° 0' 0.000" N

For more information on the subject, please contact MiAmbiente to the following email address: centrodecoordinacion@miambiente.gob.pa; ourena@miambiente.gob.pa; egcedeno@miambiente.gob.pa

3.3.4 Sanctions

3.3.4.1 Transshipment to or from vessels linked to illegal, unreported and unregulated fishing activities are prohibited in accordance with the ARAP applicable law and therefore could be subject to sanctions up to one million dollars **(\$1,000,000.00)**.

September, 2026 – update of the Sworn Declaration and Operational Disclaimer (F-167 V.03) format version.

August, 2026 – inclusion of paragraph 3.1.4 and 3.3.4, 3.3.3.6, modification in paragraphs 3.2.2, 3.2.3, 3.2.5 and 3.2.7 updated.

June, 2026 - inclusion of paragraph 3.3.2.7

April, 2026 - Inclusion of paragraph 3.3.3.6. and update of the STATEMENT DRB (F-167 V.01) format version.

February, 2026 – Modification in paragraph 3.2.4 and 3.2.5.

September, 2025 - Inclusion of paragraph 3.3.3.5.

August, 2025 – Modification in paragraph 3.3.3.4 and contact point information.

May, 2025 – Modification in paragraph 3.3.3.1 and 3.3.3.2.

March, 2025 - This circular has been revised and each paragraph has been correctly numbered.

December, 2023 – Change in the Reference section concerning to the Law No. 204 of March 18, 2021, which revokes Executive Decree No. 160 of June 6, 2013 and change in paragraph 4; new paragraph 2 (Scope) and change in paragraph 9 (9.2) - Circular Letter 2554, Rev. 4 March 8, 2023.

May, 2020 – Change in the Reference and overall changes in items 1, 2, 3 and 4; new item 5 and 6; renumbering of items 7,8 and 9 and overall changes in these.

November, 2019 – New item 7 included.

June, 2019 - New item 6 included (hyperlinks)



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August, 2018 – *Change in the Reference section concerning to the Resolution A.1117(30) adopted on 6 December 2017, which revokes Resolution A.1078(28) and change in paragraph 6.*

September, 2014– *New item 6 included and changes in reference and subject.*

August, 2013– *New item 5 included (hyperlinks).*

April, 2013– *New changes in paragraph 3 (elimination of its first paragraph).*

April, 2013 – *Change in paragraph 3.*

March, 2013.

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

Ships Registry Department
Maritime Ships Security Department / Business Intelligence Department
General Directorate of Merchant Marine
Panama Maritime Authority

Phone: (507) 501-5021 /5016 /5173

E-mail: fishingalerts@amp.gob.pa, ireina@amp.gob.pa, rjimenez@amp.gob.pa

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