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

F-34
(DCCM)
V.04

INVALID EXTENSIONS OF STATUTORY CERTIFICATION

No: **MMN-17/2026**

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1. Purpose

1.1. This Merchant Marine Notice is to provides guidance to Ship-owners/Operators, Masters, Legal Representatives of Panamanian Flagged Vessels and Recognized Organizations (ROs) regarding the extension of statutory certificates where permitted by the applicable international instrument.

1.2. This Notice clarifies the conditions and limitations applicable to statutory certificate extensions in accordance with the relevant Conventions provisions, the Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2025, and existing guidance contained in MMC-152.

2. General Principles

2.1 A statutory certificate extension is an exceptional measure and may only be granted where expressly permitted by the applicable Convention or Code and where the Administration determines that such extension is proper and reasonable.

2.2 An extension is intended solely to allow a vessel to complete its voyage to a port where the required survey and/or dry-docking can be completed. Therefore, it shall not be considered an additional period of normal certificate validity.

2.3 The maximum extension period permitted by a Convention or Code shall not be interpreted as an entitlement to continue normal commercial operations for the full period allowed. Any extension shall be limited to the minimum time necessary to complete the required survey and/or dry-docking.

3. Conditions for extension

3.1 When considering an extension, the Administration and/or the Recognized Organization acting on its behalf shall take into account the guidance contained in section 7.9 of MMC-152, including, as applicable:

3.1.1 Completion of an additional survey equivalent to at least the scope of an annual survey;

3.1.2 Completion of the renewal survey to the maximum extent practicable;

3.1.3 Underwater inspection or equivalent examination where dry-docking cannot be performed;

3.1.4 The vessel proceeding directly to the agreed final cargo discharge port and thereafter directly to the agreed survey and/or dry-docking port;

3.1.5 Limiting the extension to the minimum period required to complete the survey and/or dry-docking; and

3.1.6 The validity of the relevant classification certification.

4. Limitations on the use of extensions.

4.1 Statutory certificate extensions shall not be used:

4.1.1 As a substitute for proper survey planning, maintenance, repairs, or dry-docking;

4.1.2 Solely for commercial convenience, charter commitments, cargo availability, berth availability, or trading schedules;

4.1.3 To conduct additional trading voyages beyond those necessary to reach the approved survey and/or dry-docking port; or

4.1.4 To continue ordinary commercial operations during the extension period.

4.1.5 The Administration emphasizes that an extension granted for a specific voyage, discharge port, survey port, or dry-docking facility shall be used exclusively for that purpose. Material deviations from the approved arrangements may render the extension invalid.

5. Port State Control Considerations

5.1 Recent publications issued by the Australian Maritime Safety Authority (AMSA) and the Tokyo Memorandum of Understanding (Tokyo MOU) have identified cases where vessels operated commercially under extended statutory certificates without proceeding directly to the designated survey port. We are fully agree that such practices are inconsistent with Convention requirements and may result in Port State Control action, including detention of the vessel.

5.2 The validity and conditions of statutory certificate extensions may be verified during Port State Control inspections in accordance with the applicable IMO Procedures for Port State Control, including Resolution A.1206(34), Procedures for Port State Control, 2025.

5.3 Where an extension is not supported by the applicable Convention or Code, exceeds the permissible period, is not limited to the minimum amount of time needed, or is used outside the purpose and conditions for which it was granted, the vessel may be subject to appropriate Port State control action in accordance with the applicable international instruments and procedures.

5.4 Masters, Ship-owners/Operators and ROs are reminded that the existence of an extension does not remove the obligation to maintain the ship, its equipment and its statutory compliance in accordance with the applicable international requirements throughout the period of the extension.

6. SEGUMAR Contact Points

6.1 This Merchant Marine Circular does not establish or replace the administrative procedure for the request, evaluation or authorization of statutory certificate extensions.

6.2 For the applicable SEGUMAR contact points and offices, Ship-owners/Operators, Legal Representatives of Panamanian Flagged Vessels, Masters and Recognized Organizations shall refer to MMN-18/2021, “SEGUMAR OFFICES CONTACT POINTS (24/7 GLOBAL COVERAGE)”, which identifies the relevant SEGUMAR areas and offices.

7. Additional Reference

7.1 For the interpretation and application of statutory certificate extensions, the applicable Convention or Code and the relevant IMO instruments should be consulted together, including Resolution A.1207(34), HSSC, 2025, and MSC-MEPC.5/Circ.1, Recommended conditions for extending the period of validity of a certificate, and the related Merchant Marine Circulars 152 and 204.

October, 2026 – *New. Issued to clarify the proper application and limitations of statutory certificate extensions and to reinforce compliance with the requirements established by the applicable IMO instruments and MMC-152.*

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

Navigation and Maritime Safety Department
Directorate of Merchant Marine
Panama Maritime Authority

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Website: https://panamashipregistry.com/circulars/
Website: https://panamashipregistry.com/marine-category/marine-notices/