



**PANAMA MARITIME AUTHORITY**  
**(AUTORIDAD MARÍTIMA DE PANAMÁ)**  
**GENERAL DIRECTORATE OF MERCHANT MARINE**  
**(DIRECCIÓN GENERAL DE MARINA MERCANTE)**  
**DEPARTMENT OF CONTROL AND COMPLIANCE**  
**(DEPARTAMENTO DE CONTROL Y CUMPLIMIENTO)**

F-265  
(DCCM)  
V.00



**MERCHANT MARINE CIRCULAR MMC-354**

**To: Ship-owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Recognized Organizations (ROs) and Recognized Security Organization (RSO).**

**Subject: Maritime Cyber Risk Management**

**Reference: MSC.1/Circ.1526**  
**MSC-FAL.1/Circ.3**  
**Resolution MSC.428 (98)**  
**ISO/IEC 27001**

1. The purpose of this Merchant Marine Circular is to inform that the International Maritime Organization in June 2017 at the 98th session of the Maritime Safety Committee (MSC) adopted the **MSC-FAL.1/Circ.3 Guidelines on Maritime Cyber Risk Management** and the **Resolution MSC.428 (98)** (*for reference documents visit Maritime Security link, IMO Documents*) on Maritime Cyber Risk Management in Safety Management Systems (SMS) to safeguard shipping from current and emerging cyber threats and vulnerabilities.
2. According to this Resolution MSC.428 (98), an approved Safety Management System (SMS) should take into account cyber risk management in accordance with the objectives and functional requirements of the International Safety Management (ISM) Code. The objectives of the ISM Code include the provision of safe practices in ship operation and a safe working environment, the assessment of all identified risks to ships, personnel and the environment.
3. Cyber risks should be appropriately addressed in a SMS no later than the first annual verification of the company's *Document of Compliance* that occurs **after 1 January 2021.**
4. In a shipping context a maritime cyber risk refers to a measure of the extent to which a technology asset is threatened by a potential circumstance or event, which may result in shipping-related operational, safety or security failures as a consequence of information or system being corrupted, lost or compromised.
5. The Interim Guidelines on Maritime Cyber Risk Management was adopted in the Maritime Safety Committee (MSC) in session 96, through **MSC.1/Circ.1526** (*for reference documents visit Maritime Security link, IMO Documents*) which provides recommendations that can be incorporated into existing risk management processes. The Guidelines also include functional elements that support effective cyber risk management.

6. The third edition of the industry cyber risk management guidelines, addresses the requirement to incorporate cyber risks in the ship's safety management system (SMS). It also reflects a deeper experience with risk assessments of operational technology (OT) - such as navigational systems and engine controls - and provides more guidance for dealing with the cyber risks to the ship arising from parties in the supply chain. For detailed guidance on cyber risk management, users may also refer to The Guidelines on Cyber Security onboard Ships, (for reference documents visit [Maritime Security link](#), *IMO Documents*) latest version
7. This Administration encourages ship-owners and operators to take the necessary steps to safeguard shipping from current and emerging threats and vulnerabilities related to digitization, integration and automation of processes and systems in shipping.
8. This Administration urges that the company plans and procedures for cyber risk management should be seen as complementary to existing security and safety risk management requirements contained in the International Safety Management Code (ISM) Code and the International Ship and Port Facility Security (ISPS) Code.

**June 2019** – Including in paragraph 1, 5 and 6 reference to MSC-FAL.1/Circ.3, MSC.1/Circ.1526, Resolution MSC.428 (98), *The Guidelines on Cyber Security onboard Ships*, through [Maritime Security Link](#), *IMO Documents*).

**December, 2018** – Modification of paragraph 6 and inclusion of the *The Guidelines on Cyber Security onboard Ships*, version 3

**August, 2017**

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