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.
MSC-MEPC.5/Circ.17 of June 18, 2026
Merchant Marine Circular: MMC-123; MMC-133; MMC-136; MMC-183; MMC-346 and MMC-399.

This Merchant Marine Circular supersedes **MMC-368**.

1. Purpose:

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

2. Scope:

This Merchant Marine Circular applies to all Panama registered ships engaged on international voyages of 500 gross tonnage (GT) or more.

3. Background:

The ISPS Code entered into force on 1 July 2004 following its adoption as an amendment to the International Convention for the Safety of Life at Sea (SOLAS), 1974, under Chapter XI-2.

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4.1 SOLAS XI-2 and the ISPS Code applicability

4.1.1 The ISPS Code applies to all Panamanian-flagged ships of 500 gross tonnage and above engaged on international voyages, as described in MMC-123.

4.1.2 Panamanian-flagged ships operating in international waters or on international coastal voyages shall comply with the national regulations of the coastal State or port State in which they are operating, as applicable, to meet the requirements of the ISPS Code.

4.1.3 Effective **September 1, 2025**, the online application for the issuance of a Full-Term International Ship Security Certificate (ISSC) or ISPS Authorization shall be available through the following website: https://ecertificatespanama.amp.gob.pa. Users must register to access the system and download the User Manual.

4.2 Responsibilities of the Company

4.2.1 CSO Designation & Endorsement: The Company shall designate a Company Security Officer (CSO) and ensure that the CSO holds a Declaration of Company Security Officer (CSO) duly endorsed by the Panama Maritime Authority prior to the initial, intermediate, or renewal verification.

4.2.2 SSAS Testing Management: For ships entering the Panamanian Registry, the Company Security Officer (CSO) shall schedule the first Ship Security Alert System (SSAS) test through the E-Certificate Platform. Thereafter, the CSO shall schedule an SSAS test every twelve (12) months, in accordance with MMC-133.

4.2.3 Verification alignment with RSOs: The Company shall maintain proper communication with its Recognized Security Organization (RSO) to ensure that all ISPS verifications are carried out within the timeframes established in Part A, section 19.1 of the ISPS Code.

4.2.4 Handling exceptional delays: If, due to exceptional circumstances, an ISPS verification cannot be completed within the timeframes established in Part A, section 19.1.1 of the ISPS Code, the Company shall submit a request through the E-Certificate Platform before the expiration of the Interim ISSC or before the expiration of the applicable renewal verification window, as appropriate.

4.2.5 Full-Term ISSC Application: Upon completion of the initial or renewal verification, the Company shall apply through the E-Certificate Platform for the issuance of the Full-Term International Ship Security Certificate (ISSC) by the Panama Maritime Authority, in order to ensure that the ship remains covered by a valid certificate.

4.3. Responsibilities of the Company Security Officer (CSO)

4.3.1 The Company Security Officer (CSO) shall**:**

4.3.1.1. Acts as the primary liaison between the Company and the Panama Maritime Authority (PMA) for ISPS Code implementation. Any change in the CSO or Alternate CSO requires an immediate update to the Ship Security Plan (SSP) and an officially endorsed Declaration of CSO from the PMA kept on board each ship.

4.3.1.2. Apply for the Declaration of Company Security Officer (CSO) to be duly endorsed by the Panama Maritime Authority prior to the initial, intermediate, or renewal verification conducted by the Recognized Security Organization (RSO), in accordance with MMC-123.

4.3.1.3. Ensure that the Continuous Synopsis Record (CSR) is requested upon registration of the ship under the Panamanian flag and that it is updated whenever any changes occur.

4.3.1.4. Coordinate all ISPS verifications with the Recognized Security Organization (RSO) within the timeframes established in the ISPS Code to avoid deficiencies and/or ship detention.

4.3.1.5. Schedule the annual Ship Security Alert System (SSAS) Test in accordance with MMC-133.

4.3.1.6. Ensure that the name and contact details of the CSO are correctly reflected in the Ship Security Plan (SSP).

4.4 Instructions to the Recognized Security Organizations (RSOs): Restrictions and change between RSO

4.4.1. All Recognized Security Organizations (RSOs) acting on behalf of the Panama Maritime Authority, as listed in MMC-136, shall maintain proper communication with the Company and ensure that all necessary arrangements are made to complete the ISPS verifications within the timeframes established in Part A/19.1 of the ISPS Code.

4.4.2. During the initial, intermediate, renewal and additional ISPS verifications, the Recognized Security Organization (RSO) shall verify that:

4.4.2.1 A valid **Declaration of Company Security Officer (CSO)** duly endorsed by the Panama Maritime Authority is kept on board.

4.4.2.2 The ship carries an updated **Continuous Synopsis Record (CSR)**. A CSR not available on board and/or not updated, constitute a minor non-conformity; therefore, RSO shall proceed according to paragraph 4.7.7.

4.4.2.3 The **Ship Security Alert System (SSAS)** has been properly configured to transmit alerts to threat@amp.gob.pa, in accordance with MMC-133.

4.4.2.4 Confirmation of the Annual SSAS Test issued by the Flag Administration. Thereafter, the Company Security Officer (CSO) shall schedule the next Annual SSAS Test every twelve (12) months.

4.4.3. The Verification Report shall indicate the number and date of issuance of the Continuous Synopsis Record (CSR) carried on board the ship at the time of the verification.

4.4.4. After completion of the **intermediate verification** the RSO shall submit, as soon as practicable and no later than thirty (30) days after from the completion date, a copy of the Verification Report and a copy of the duly endorsed International Ship Security Certificate (ISSC) to isps@amp.gob.pa and issc@amp.gob.pa. Failure to comply with this requirement shall be considered malpractice.

4.4.5. Whenever an Interim International Ship Security Certificate (ISSC) is suspended or withdrawn by the Recognized Security Organization (RSO), the RSO shall immediately notify the Panama Maritime Authority by sending the corresponding information to isps@amp.gob.pa and ro-panama@segumar.com.

4.4.6. When a **Conditional Certificate** is issued by the Recognized Security Organization (RSO), with the prior authorization of the Panama Maritime Authority, a copy of the certificate shall be submitted to isps@amp.gob.pa.

4.4.7. In the event of transfer between Recognized Security Organizations (RSOs) the following instructions must be observed:

4.4.7.1. The gaining Recognized Security Organization (RSO) shall notify the Panama Maritime Authority by email to isps@amp.gob.pa and shall complete and submit the Notification Form for Transfer of ISPS Certification between RSOs.

4.4.7.2. Immediately upon completion of the verification, and in any event no later than thirty (30) days thereafter, the gaining Recognized Security Organization (RSO) shall submit a copy of the Verification Report and the duly endorsed International Ship Security Certificate (ISSC) to isps@amp.gob.pa. The immediate report is required at the earliest opportunity in order to update its records of change between Recognized Security Organizations in charge of ISPS certification.

4.4.7.3. If the transfer between RSOs takes place during the Initial, Intermediate, additional or Renewal Verification window dates, the gaining Recognized Security Organization (RSO) shall follow the procedures established in Annex 1 (Scenarios 9, 10, 11, 12, and 13), as applicable.

4.4.8. Recognized Security Organizations (RSOs) acting on behalf of the Republic of Panama shall not, under any circumstances:

4.4.8.1. Issue consecutive Interim International Ship Security Certificate (ISSC)
4.4.8.2. Extend the validity Interim International Ship Security Certificate (ISSC)
4.4.8.3. Issue a Short-Term International Ship Security Certificate (ISSC) following the successful completion of an initial verification(*).
4.4.8.4. Issue a Full-Term International Ship Security Certificate (ISSC), as this certificate shall be issued exclusively by the Panama Maritime Authority.
4.4.8.5. Establish or modify the applicable security level for a ship.

4.5 ISPS Verifications Report information

4.5.1. Each ship subject to the ISPS Code shall be subject to the verifications specified in Part A/19.1 of Part A; therefore the ISPS Verification Report shall include, as a minimum, the following information:

- Place and date of the ISPS verification.
- Identification of the audit team.
- Type/scope of verification (Interim, Initial, Intermediate, Renewal, or Additional).
- Audit plan.
- Name of the Company Security Officer (CSO).
- Identification of the Ship Security Officer (SSO).

(*) For exceptional cases refer to section 4.6.17 of this Circular.

- Sequence Number and date of issuance of the latest Continuous Synopsis Record (CSR).
- Date of the latest Annual Ship Security Alert System (SSAS) Test.
- Details of any observations, non-conformities, and required corrective actions, where applicable.
- Recommendations.
- Conclusion.

4.5.2. If the Recognized Security Organization (RSO) identifies a major non-conformity during an ISPS verification that compromises the security of the ship, its cargo, or its personnel, the non-conformity shall be documented and immediately reported to the Company Security Officer (CSO) and this Administration through the Maritime Ship Security Department to the following email address isps@amp.gob.pa.

4.5.3. Any failure of security equipment or systems, or the suspension of a security measure that does not compromise the ship's ability to operate at Security Levels 1, 2, or 3, shall be reported without delay to the Maritime Ship Security Department. The notification shall include details of the equivalent alternative security measures implemented on board until the failure or suspension has been rectified, along with the action plan indicating the schedule for repair or replacement.

4.6 ISPS Verifications and Certification

4.6.1. An **Interim International Ship Security Certificate (ISSC)** may be issued only after the Recognized Security Organization (RSO) has verified that the ship complies with the requirements of the ISPS Code Part A/19.4. An Interim ISSC may be issued in the following circumstances:

- To ship without an ISSC upon delivery or prior to entering or re-entering service.
- When a ship is transferred to the Panamanian Registry (Change of Flag).
- To a ship for which a Company has newly assumed responsibility for its operation.

4.6.2. The Panama Maritime Authority may authorize only in exceptional circumstances the issuance of a **Short-Term International Ship Security Certificate (ISSC)** in accordance with paragraph 4.6.17 of this Circular and only allowed when the Initial Verification is completed on the same day that the Interim ISSC expires. In such cases, the Recognized Security Organization (RSO) may issue a Short-Term ISSC with a validity period not exceeding thirty (30) days from the date of issuance, to allow the Company sufficient time to complete the application process for the issuance of the Full-Term ISSC through the E-Certificate Platform.

4.6.3. After completion of the interim verification, an **Interim International Ship Security Certificate (Interim ISSC)** may be issued in accordance with the ISPS Code Part A/19.4.1 and following verification of items indicated in the ISPS Code Part A/19.4.2. The certificate shall be clearly identified as **"Interim",** and its period of validity shall not

exceed six (6) months. The Interim ISSC shall be issued in the format provided in Appendix 2 of the ISPS Code.

4.6.4. In case of changes during the validity of the Interim International Ship Security Certificate (Interim ISSC), the Recognized Security Organization (RSO) shall reissue the Interim International Ship Security Certificate (Interim ISSC) with the same expiry date as the existing certificate when any of the following information changes:

- Change of ship's name.
- Change of gross tonnage.
- Change of the Company name and/or registered address.
- Change of ship type.

4.6.5. In case of the information listed below changes during the validity of the Full-Term International Ship Security Certificate (ISSC), the Recognized Security Organization (RSO) shall issue a **Short-Term ISSC** with a validity not exceeding thirty (30) days from the date of issuance. Subsequently, the Panama Maritime Authority shall reissue the Full-Term ISSC with the same expiry date as the existing certificate, provided that the applicable requirements have been fulfilled. (Refer to the following scenarios shall apply in accordance with Annex 1:

- Change of ship name (Scenario 4).
- Change of gross tonnage (Scenario 5).
- Change of ship type (Scenario 6).
- Change of Company name and/or registered address (Scenarios 7 and/or 8).

4.6.6. The **Initial Verification** shall be completed within the period of validity of the Interim International Ship Security Certificate (ISSC), in accordance with the ISPS Code Part A/19.1.1. and shall be carried out before the ship is put in service or before the Full-Term International Ship Security Certificate (ISSC) is issued for the first time, in order to verify that the ship fully complies with the applicable requirements of ISPS Code Part A/19.1 and Part A/19.2.

4.6.6.1. Due to exceptional circumstances, the Initial Verification cannot be completed before the expiration of the Interim International Ship Security Certificate (ISSC), the Company, shipowner, Recognized Security Organization (RSO), or legal representative shall submit a request through the E-Certificate Platform, under the **ISPS Authorizations** option, before the expiration of the Interim ISSC. The following documents shall be submitted with the request:

4.6.6.1.1. A statement issued by the Recognized Security Organization (RSO) explaining the reason why the verification could not be completed and specifying the exact date and place where the Initial ISPS Verification will be conducted.

4.6.6.1.2. A copy of the Interim International Ship Security Certificate (ISSC).

4.6.6.1.3. A copy of the valid Document of Compliance (DOC).

4.6.6.1.4. A copy of the SMC.

Note: The Panama Maritime Authority shall verify that the ship maintains a valid **Conformance Test Report (CTR)** at the time the application is received; therefore, please verify compliance before placing the application.

4.6.6.2. In accordance with ISPS Code Part A/19.4.5, consecutive Interim International Ship Security Certificates (ISSC) shall not be issued. Neither the Administration nor the Recognized Security Organization (RSO) may grant an extension or consecutive interim certificate if the intent of the Company or ship is to delay full compliance with SOLAS Chapter XI-2 and Part A of the Code.

4.6.7. For ships underwent an **Initial Verification** following new construction, transfer to the Panama Registry, or a change of Company, the Panama Maritime Authority shall issue the Full-Term ISSC only after satisfactory completion of verification and simultaneously receiving through the E-Certificate Platform, the application for the amendment of item 14 of the Continuous Synopsis Record (CSR). **The amended CSR and the Full-Term ISSC shall be issued simultaneously.**

4.6.8. A **Full-Term International Ship Security Certificate (Full-Term ISSC)** shall be issued exclusively by the Panama Maritime Authority (PMA) after the ship has successfully completed an **Initial or Renewal Verification** and has demonstrated compliance with the applicable requirements of SOLAS Chapter XI-2, the ISPS Code Part A/19.2, Part A/19.3, the relevant provisions of Part B of the ISPS Code, and any additional requirements established by the Panama Maritime Authority. The full-term certificate shall be valid for a period not exceeding five (5) years from the completion date of the initial or renewal verification established in the ISPS Code Part A/19.3. The original Full-Term ISSC shall be kept on board the ship at all times.

4.6.9. Since **1 January 2020**, the Panama Maritime Authority (PMA) shall issue the Full-Term International Ship Security Certificate (ISSC) indicating the same ship type as that shown on the valid Safety Management Certificate (SMC) issued by the Recognized Organization (RO).

The ship type shall correspond to one of the following categories: passenger ship, passenger high-speed craft, cargo high-speed craft, bulk carrier, oil tanker, chemical tanker, gas carrier, mobile offshore drilling unit, or other cargo ship.

4.6.10. Since **15 March 2025**, the issuance of a Full-Term International Ship Security Certificate (ISSC) shall be subject to the ship maintaining a valid **Conformance Test Report (CTR)** in accordance with the provisions of MMC-195.

4.6.11. Intermediate Verification: To maintain the validity of the Full-Term International Ship Security Certificate (ISSC), at least one Intermediate Verification shall be carried out between the second and third anniversary dates of the certificate (between 24 and 36

months from the completion of the initial or renewal verification), in accordance with the ISPS Code Part A/19.1.1.3. This window date cannot be extended or postponed; failure to complete the verification within the prescribed period will automatically invalidate the ISSC.

4.6.11.1. Upon successful completion of the Intermediate Verification, the Recognized Security Organization (RSO) shall endorse the Full-Term ISSC.

4.6.11.2. If the shipowner or the Company decides to appoint a different Recognized Security Organization (RSO) to conduct the Intermediate Verification, the Panama Maritime Authority shall be notified in advance by email at isps@amp.gob.pa. Before conducting the verification, the gaining Recognized Security Organization (RSO) shall complete the applicable documentation for the transfer of ISPS certification and shall follow the procedures established in Annex 1 – Scenario 12.

4.6.11.3. Any inconvenience or unforeseen circumstance affecting the completion of the Intermediate Verification shall be communicated immediately to the Panama Maritime Authority for assessment on a case-by-case basis, providing the full details of the extraordinary circumstance and supporting justification.

4.6.11.4. Such communication shall be submitted to isps@amp.gob.pa prior to the expiration of the applicable verification window date. This evaluation shall not be considered an extension or postponement of the verification window established under the ISPS Code.

4.6.12 Renewal Verification: Renewal Verification shall be carried out at intervals not exceeding five (5) years. The verification shall be completed within the period established in the ISPS Code Part A/19.1.1.2 and 19.3.

4.6.12.1 Upon successful completion of the Renewal Verification, the Recognized Security Organization (RSO) shall endorse the existing Full-Term International Ship Security Certificate (ISSC) in accordance with ISPS Code Part A/19.3.4, "Renewal verification completed and section A/19.3.4 of the ISPS Code applies" indicating that the Certificate is valid for five (5) months starting from the completion date of the renewal verification. The Company shall submit an application through the E-Certificate Platform for the issuance of the Full-Term ISSC before the expiry of the five-month endorsement period indicated in the existing certificate under the endorsement.

4.6.12.2 If the International Ship Security Certificate (ISSC) expires while the ship is not in a port where the Renewal Verification can be carried out, the Panama Maritime Authority may extend the validity of the certificate according to the ISPS Code Part A/19.3.5. The request shall be submitted through the E-Certificate Platform under the ISPS Authorizations option and shall be accompanied by the following document:

- Confirmation issued by the Recognized Security Organization (RSO) specifying the exact date and port where the Renewal Verification will be conducted and reasons impeding to complete the Renewal verification.

4.6.12.3 Before the expiry of the three (3)-month extension period, the Renewal Verification shall be completed, and the Company shall immediately apply through the E-Certificate Platform for the issuance of the Full-Term ISSC.

4.6.12.4 Upon expiration of the maximum extension period, whether or not the Renewal Verification has been completed, the Recognized Security Organization (RSO) shall not issue any additional ISPS certification to the ship. In the event that the Renewal Verification has not been completed within the applicable period, the existing International Ship Security Certificate (ISSC) shall be considered invalid, and the ISPS certification process shall be re-initiated, including the completion of an Interim Verification, subject to prior authorization by the Administration.

4.6.13 Additional Verification: An Additional Verification may be conducted at the request of the Panama Maritime Authority or by Port State Control Authorities.

4.6.14 Before carrying out an Additional ISPS Verification, prior authorization from the Panama Maritime Authority shall be obtained through the E-Certificate Platform in the following cases:

4.6.14.1 Verification to close outstanding non-conformities.
4.6.14.2 Ship Security Alert System (SSAS) malfunction.
4.6.14.3 Replacement of Ship Security Alert System (SSAS) equipment.

4.6.15 Authorization is not required to carry out Additional ISPS Verification in the following cases:

4.6.15.1 Change of ship name.
4.6.15.2 Change of gross tonnage.
4.6.15.3 Change of ship type.
4.6.15.4 Port State Control (PSC) detention. In such cases, the PSC Inspection Report and the corresponding ISPS Verification Report shall be submitted immediately to isps@amp.gob.pa
4.6.15.5 Flag State detention.

4.6.16 Upon successful completion of the Additional ISPS Verification, the Recognized Security Organization (RSO) shall endorse the existing Full-Term International Ship Security Certificate (ISSC), where applicable.

4.6.17 Short-Term International Ship Security Certificate (Short-Term ISSC): A certificate that may be issued by the Recognized Security Organization (RSO) in the following circumstances:

- When changes are made during validity, the Full-Term International Ship Security Certificate (ISSC) requires the temporary issuance of a certificate until the corresponding amendments are processed by the Administration.
- In cases where the **Initial Verification** is completed on the same day that the Interim ISSC expires.
- In cases described in paragraph 4.6.5
- In extraordinary circumstances, in accordance with MSC-MEPC.5/Circ.17, dated June 18, 2026.

In all cases described above, the validity of the Short-Term ISSC shall not exceed thirty (30) days from the date of issuance or remain valid beyond the ship´s arrival at the next port.

4.6.18 Remote Verification: Remote verification may be carried out by the Recognized Organization (RO) in exceptional circumstances and in accordance with the conditions and limitations established in MSC-MEPC.5-Circ.17 - Guidance On Assessments And Applications Of Remote Surveys ISM Code Audits And ISPS Code pdf, dated June 18, 2026. A remote verification shall be followed by the corresponding in-person verification, as applicable, and shall not be considered a substitute for the physical attendance and verification by the RO.

4.6.19 Conditional Certificate: A Conditional Certificate may be issued by a Recognized Organization (RO), with prior authorization from the Panama Maritime Authority, under the following circumstances:

- When major non-conformities are identified;
- In cases of damage, failure, or unavailability of equipment or systems affecting the validity of the certificate; or
- In other cases, duly justified by the circumstances and authorized by the Panama Maritime Authority.

4.6.19.1 The issuance of a Conditional Certificate shall be subject to the determination that the security of the ship and the safety and security of the persons on board are not compromised and that the situation does not present an unacceptable risk to maritime security.

4.6.19.2 The Conditional Certificate shall be valid for a period determined by the Panama Maritime Authority based on the circumstances and conditions applicable to each case, and shall not exceed ninety (90) days. The certificate shall be clearly identified by the designation “Conditional Certificate.” The issuing Recognized Organization (RO) shall submit a copy of the Conditional Certificate without delay to isps@amp.gob.pa and ro-monitoringfees@segumar.com.

4.7. Major and Minor Failures

4.7.1. The security equipment identified in the approved Ship Security Plan (SSP) shall remain operational at all times.

4.7.2. During the ISPS verification, the Recognized Security Organization (RSO) shall verify that the Ship Security Alert System (SSAS) and the Long-Range Identification and Tracking (LRIT) equipment are fully operational and that the ship carries a valid **Conformance Test Report (CTR)** in accordance with MMC-133 and MMC-195. Failure of either system or the absence of a valid Conformance Test Report (CTR) shall be considered a **Major Failure**.

4.7.3. Any Major Failure shall be reported immediately to:

- The Panama Maritime Authority (PMA) at isps@amp.gob.pa;
- The Port Facility Security Officer (PFSO), where applicable; and
- The competent authorities of any relevant coastal State(s), where applicable.

4.7.4. When a Major Failure is identified, immediate corrective action shall be taken to restore compliance before the ship departs. The Major Failure shall be downgraded before the Recognized Security Organization (RSO) endorses the International Ship Security Certificate (ISSC) following an Intermediate or Renewal Verification. Where the Major Failure is identified during an Initial Verification, the Recognized Security Organization (RSO) shall request authorization from the Panama Maritime Authority for the issuance of a Conditional Certificate.

4.7.5. The Panama Maritime Authority may establish any additional conditions or corrective measures it considers necessary before authorizing the issuance of a Conditional Certificate.

4.7.6. An Additional Verification shall be carried out within the period agreed by the Panama Maritime Authority and the Recognized Security Organization (RSO) to verify the effective implementation of the corrective actions.

4.7.7. Any Minor Failure shall be reported by the Recognized Security Organization (RSO) to the Panama Maritime Authority without delay at isps@amp.gob.pa. The report shall include:

- Details of the equivalent alternative security measures implemented on board until the failure or suspension has been rectified; and
- An action plan specifying the schedule for repair or replacement of the affected equipment or system.

4.8. Notification of invalidation of the International Ship Security Certificate (ISSC)

4.8.1. An Interim International Ship Security Certificate (ISSC) may be invalidated only by the Recognized Security Organization (RSO) that issued it. A Full-Term International Ship Security Certificate (ISSC) may be invalidated only by the Panama Maritime Authority (PMA), upon notification from the Recognized Security Organization (RSO). Such notification shall be submitted to isps@amp.gob.pa.

4.8.2. An International Ship Security Certificate (ISSC) shall become invalid, including but not limited to, in the following circumstances:

4.8.2.1. The ship has not undergone the required **Initial, Intermediate**, or **Renewal** Verification within the applicable timeframe established by the ISPS Code.
4.8.2.2. The Company ceases to assume responsibility for the operation of the ship.
4.8.2.3. The ship is transferred to another flag State.
4.8.2.4. A Full-Term International Ship Security Certificate (ISSC) has been issued to replace the Interim ISSC.
4.8.2.5. The Company requests the withdrawal of the ship from the Panama Maritime Authority's ISPS Register.
4.8.2.6. A section of the approved Ship Security Plan (SSP) requiring prior approval has been amended without the authorization of the Panama Maritime Authority.
4.8.2.7. Corrective actions arising from an ISPS verification have not been completed within the agreed timeframe.
4.8.2.8. The ship operates in a manner that does not comply with the applicable requirements of the ISPS Code.
4.8.2.9. The ship fails to maintain its approved Ship Security Plan (SSP) in accordance with the requirements of the ISPS Code.
4.8.2.10. Any other circumstance that, in the opinion of the Recognized Security Organization (RSO), justifies recommending the invalidation of the certificate to the Panama Maritime Authority.

4.9. Ships out of service for more than six (6) months or located in areas affected by warfare

4.9.1. Where a ship has remained out of service for more than six (6) months, the Company shall request an Interim International Ship Security Certificate (Interim ISSC) in accordance with section 19.4.2 of Part A of the ISPS Code. Prior to the issuance of the Interim ISSC, the Recognized Security Organization (RSO) shall verify that the ship complies with the applicable requirements of section 19.4.2 of Part A of the ISPS Code. The procedures established in Annex 1 – Scenario 14 shall also be followed.

4.9.2. Ships that have remained out of service for a period exceeding six (6) months, or that are located in areas affected by warfare and have been unable to carry out the required audits due to such circumstances, may request Lay-Up Status from the Panama Maritime Authority, subject to the applicable requirements and evaluation by

the Administration.

4.10. Harmonization of ISM/ISPS certification

4.10.1. The harmonization of ISM and ISPS audits reduces the number of separate auditor and verification visits on board the ship, optimizing the use of time and resources while ensuring compliance with the applicable regulatory requirements. The Panama Maritime Authority recognizes the harmonization of ISM/ISPS certification.

4.10.2. Upon successful completion of the harmonized ISM/ISPS audit and verification, the Safety Management Certificate (SMC) and the International Ship Security Certificate (ISSC) shall be issued with the same date of issuance and the same expiry date. The Company shall apply through the E-Certificate Platform for the issuance of the Full-Term ISSC in accordance with the procedures established in Annex 1 – Scenario 17.

4.11. SHIP SECURITY ALERT SYSTEM (SSAS) EXEMPTION CERTIFICATE.

4.11.1. The application for a Ship Security Alert System (SSAS) Exemption Certificate shall be submitted in accordance with the provisions of MMC-123.

4.12. PRINTING GUIDANCE FOR ISSC, ISPS AUTHORIZATION, AND SSAS EXEMPTION CERTIFICATE

4.12.1. The International Ship Security Certificate (ISSC) shall be printed in a two-page format (Letter size: 8.5" x 11" or A4 size if Letter size is not available) and shall be kept on board the ship. The certificate may be printed in black and white or in color.

4.12.2. The ISPS Authorization shall be printed in a single-page format (Letter size: 8.5" x 11" or A4 size if Letter size is not available) and shall be kept on board the ship. The authorization may be printed in black and white or in color.

4.12.3. The Ship Security Alert System (SSAS) Exemption Certificate shall be printed in a single-page format (Letter size: 8.5" x 11" or A4 size if Letter size is not available) and shall be kept on board the ship. The certificate may be printed in black and white or in color.

NOTE: For guidance regarding ISPS certification scenarios and the requirements for the issuance of the Full-Term International Ship Security Certificate (ISSC), please refer to Annex 1.

October, 2026 – Completely revised.
August, 2025 Modification on paragraph 4.2.4, 4.2.5, 4.7.2.2, 4.7.4.6, 4.8.2, 4.8.3, 4.10.3, 4.10.5, 4.11.2, 4.19.1
June, 2025 *-Modification paragraph 4.7.2.*
March, 2025 – *Correction in the paragraph 4.7.3*

Merchant Marine Circular

February, 2025 *- Restructuration of all Circular.*
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/

ANNEX 1

ISPS CERTIFICATION GUIDANCE
(SCENARIOS)

	SCENARIOS	ACTION REQUIERED	SHIP SECURITY PLAN	CERTIFICATION AND MINIMUM FLAG REQUIEREMENTS	REQUIEREMENTS FOR THE ISSUANCE OF FULL TERM ISSCBY PMA https://ecertificatespanama.amp.gob.pa
1	For Change of Flag or New Construction	Interim Verification on board	1. Review that the SSO complies with the requirements of ISPS Code Part A/12.1 2. Review that the SSP addresses ISPS Code A/9.4.1 to A/9.4.18 3. Review that a copy of the SSP has been submitted to the Recognized Security Organization for approval.	a) Interim verification as required by ISPS Code/19.4.2. b) Issue interim ISSC c) Review that the CSR has been already issued by PMA. d) Review that the CSO declaration has been already endorsed by PMA. e) Check that the SSAS equipment already configured with the following email account threat@amp.gob.pa, according to the MMC-133. f) Review the Annual SSAS Test confirmation by the Flag. **Note:** The items c, d, e and f are not mandatory during the interim verification however, during the initial verification the ISPS auditor shall assure that all mentioned points above have been fulfilled and must be indicated in the audit report.	• Document of Compliance(DOC) • SMC • **Interim ISSC** • SSP Approval Certificate or SSPApproval Letter • Initial verification audit report duly signed and stamped. • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration orPanamanian Consulate for $ 250.00 + Handling fee

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2	Change of Operator Company	Interim verification on board	1. Review that the SSO complies with the requirements of ISPS Code Part A/12.1. 2. Review that the SSP addresses ISPSCode A/9.4.1 to A/9.4.18 3. Review that a copy of the SSP has been submitted to the Administration or Recognized Security Organization for approval.	a) Interim verification as required by ISPS Code/19.4.2 b) Issue Interim ISSC c) Review that the CSR is updated with the operator company. d) Review that the CSO declaration has been already issued by PMA. e) Review that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. f) Review the confirmation of the Annual SSAS Test by theFlag. **Note:** The items c, d, e and f are not mandatory during the interim verification however, during the initial verification the ISPS auditor shall assure that all mentioned points above have been fulfilled and must be indicated in the audit report.	• Document of Compliance(DOC) • SMC • **Interim ISSC** • Initial audit report duly signed and stamped. • SSP Approval Certificate or SSPApproval Letter. • **CTR –A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $ 250.00 + Handling fee
3	Renewal	Renewal Verification	This verification shall ensure that the security system and any associated security equipment of the ship fully complies with the applicable requirements of SOLAS Chapter/XI-2 and	a) Verify that the CSR is updated. b) Verify that the CSO declaration has been already issued by PMA. c) Verify that the SSAS equipment already	• DOC • SMC • **ISSC Endorsed** • SSP Approval Certificate

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ISPS CERTIFICATION GUIDANCE
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			ISPS Code/Part A.	configured with the following account threat@amp.gob.pa, according to the MMC-133. d) Verify the confirmation of the Annual SSAS Test by the Flag. e) Endorse the existing ISSC.	• Renewal Verification Audit report duly signed and stamped. • Intermediate verification audit report. • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $ 250.00 + Handling fee
4	Change of vessel name during the validity of the ISSC (Full Term)	Verification on board Or documentary verification	1. Check the Amend SSP Approval Letter with the new vessel name. 2. Check the correct vessel name on the title page, index page and revision page of SSP.	a) Check the correct vessel name on all certificates and documents. a) Check the CSO Declaration duly endorsed with the new vessel name issued by PMA. b) Ensure that SSAS has been reprogrammed with the new vessel name according to the MMC-133. c) Review the Annual SSAS Test confirmation issued by the Flag with the new name. d) Issue a Short Term ISSC **Note:** 1. It will not be necessary	• Verification Audit report • **Short Term ISSC** • SMC • Amend SSP approval Letter • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee • Intermediate verification audit report (if applied).

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ISPS CERTIFICATION GUIDANCE
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				to request an additional audit authorization for change of vessel name. 2. The applicant must apply for the re-issuance of theFull Term ISSC with thesame expiry date as previous certificate.	
5	Change of Tonnage during the validity of the ISSC (Full Term)	Verification on board Or documentary verification	1. Check the correct tonnage on the title page index page and revision page of SSP. (If applied). 2. SSP Approval Letter with the new tonnage. (If applied)	a) Verify that the CSR is updated. b) Verify that the CSO declaration has been already issued by PMA. c) Verify that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. d) Verify the Annual SSAS Test confirmation issued by the Flag. e) Issue a short term ISSC. **Note:** 1. It will not be necessary to request an additional audit authorization for tonnage change.	• **Short Term ISSC** • SMC • Verification Audit Report • Amend SSP approval Letter (if apply). • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee • Intermediate verification audit report (if applied).

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ISPS CERTIFICATION GUIDANCE
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				2. The applicant must apply for the re-issuance of the Full Term ISSC with the same expiry date as previous certificate.	
6	Change of type of vessel during the validity of the ISSC (Full Term)	Verification on board	1. Amend SSP Approval Letter with the new type of vessel. 2. Check the correct type of vessel on the title page, index page and revision page of SSP.	a) Issue a short term ISSC. b) The applicant must apply for the re-issue of the Full Term ISSC with the same expiry date as previous certificate. **Note:** 1. It will not be necessary to request an additional audit authorization for change of vessel type. 2. The applicant must apply for the re-issuance of the Full Term ISSC with the same expiry date as previous certificate.	• **Short Term ISSC** • SMC • Verification audit report • Amend SSP approval Letter. • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee • Intermediate verification audit report (if applied).
7	Change of Company name	Attendance on board not required	1. Approve SSP amendments to reflect new company and address. 2. Amend SSP approval letter.	a) The auditor may issue a short term ISSC in order this Administration re-issue the ISSC with the same expiry date as previous certificate.	• Document of Compliance (DOC) • SMC • **Short term ISSC** • Amend SSP Approval

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ISPS CERTIFICATION GUIDANCE (SCENARIOS)

					Letter • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee • Intermediate verification audit report (if applied).
8	Change of company address	Attendance on board not required	1. Approve SSP amendments to reflect new company and address. 2. Amend SSP approval letter.	The auditor may issue a short term ISSC in order this Administration re-issue the ISSC with the same expiry date as previous certificate.	• Document of Compliance (DOC) • SMC • **Short term ISSC** • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee • Intermediate verification audit report (if applied).

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ISPS CERTIFICATION GUIDANCE (SCENARIOS)

9	If the transfer of Security Management Systems (Change of RSO) occur during the validity of the interim ISSC.	Initial verification must be completed during the validity of the existing ISSC	1. Check that the SSO complies with the requirements of ISPS Code Part A/12.1 2. Check that the SSP addresses ISPS Code A/9.4.1 to A/9.4.18 3. The SSP must be approved on board.	a) 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. b) Ensure that the CSR has been already issued by PMA and that is updated. c) Check that the CSO declaration has been already endorsed by PMA. d) Check that the SSAS equipment already configured with the following email account threat@amp.gob.pa, according to the MMC- 133. e) Review the Annual SSAS Test confirmation issued by the Flag. **Note:** During the initial verification the ISPS auditor shall assure that all mentioned points above have been fulfilled and must be indicated in the audit report.	• Document of Compliance (DOC) • SMC • **Interim ISSC** • SSP Approval Certificate or SSP Approval Letter • Initial verification audit report duly signed and stamped. • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $ 250.00 + Handling Fee.

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ISPS CERTIFICATION GUIDANCE (SCENARIOS)

10	Transfer of Security Management Systems Certification (Change of RSO)To reinitiate all the process	Initial verification on board	1. Verify that the SSP is being effectively implemented on board. 2. Amend SSP Approval Letter (If applied)	a) 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. b) Verify that the CSR already issued by PMA. c) Verify that the CSO declaration has been already issued by PMA. d) Verify that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. e) Verify the Annual SSAS Test confirmation issued by the Flag.	• DOC • SMC • **A statement issued by the RSO.** • Initial Verification Audit report • SSP Approval Certificate or SSP Approval Letter. • **CTR – A valid Conformance Test Report (will be verified)** • Payment Receipt by this Administration or Panamanian Consulate for $250.00 + Handling Fee. **Note:** To request the re-issue of the Full term ISSC must to select the option Change of RSO through the online platform.

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ISPS CERTIFICATION GUIDANCE
(SCENARIOS)

11	Transfer of Security Management Systems Certification out of window of the existing ISSC (Change of RSO)	Additional verification on board	1. Verify that the SSP is being effectively implemented on board. 2. Amend SSP Approval Letter (If applied)	a) 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. b) Review the latest CSR c) Review that the CSO declaration has been already issued by PMA. d) Ensure that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. e) Verify the Annual SSAS Test confirmation.	• The auditor shall endorse the ISSC existing and it same will remain fully valid. • It will be necessary that the RSO send us the audit verification report and copy of the endorse ISSC at isps@amp.gob.pa, in order to update the RSO in our system.

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ISPS CERTIFICATION GUIDANCE (SCENARIOS)

12	Transfer of Security Management Systems Certification during the intermediate window of the existing ISSC (Change of RSO)	Intermediate verification on board	1. Verify that the SSP is being effectively implemented on board. 2. Amend SSP Approval Letter (If applied)	a) 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. b) The auditor shall endorse the ISSC existing. c) Check that the CSR already issued by PMA. d) Verify that the CSO declaration has been already issued by PMA. e) Ensure that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. f) Verify the Annual SSAS Test confirmation issued by the Flag.	• The auditor shall endorse the existing ISSC and it same will remain fully valid. • It will be necessary that the RSO send us the audit verification report and copy of the endorse ISSC at isps@amp.gob.pa, in order to update the RSO in our system.

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ISPS CERTIFICATION GUIDANCE
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13	Transfer of Security Management Systems Certification during the renewal window of the existing ISSC (Change of RSO)	Renewal Verification on board	1. Verify that the SSP is being effectively implemented on board. 2. Amend SSP Approval Letter (If applied)	a) 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. b) The auditor shall endorse the ISSC existing or issue a short term ISSC. c) Check that the CSR already issued by PMA. d) Verify that the CSO declaration has been already issued by PMA. e) Ensure that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. f) Verify the Annual SSAS Test confirmation issued by the Flag. g) The auditor shall endorse the ISSC existing.	• DOC • SMC • **ISSC Endorsed** • Renewal verification audit report • SSP Approval Certificate or SSP Approval Letter. • ISPS Intermediate verification audit report duly signed and stamped. • **CTR – A valid Conformance Test Report (will be verified)** • Payment Receipt by this Administration or Panamanian Consulate for $250.00 + Handling fee **Note:** it necessary request a new certificate and must be made through our website: https://ecertificatespanama.amp.gob.pa and must select the renewal option. ISSC Full Term shall be valid from the date of completion of the renewal verification.

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ISPS CERTIFICATION GUIDANCE
(SCENARIOS)

14	Ships out of service more than 6 months (re-entry into services)	Interim audit on board	1. Check that the SSO complies with the requirements of ISPS Code Part A/12.1 2. Check that the SSP addresses ISPS Code A/9.4.1 to A/9.4.18 3. Check that a copy of the SSP has been submitted to the Administration or Recognized Security Organization for approval.	a) Interim verification as required by ISPS Code A/19.4.2 b) Issue Interim ISSC c) Verify that the CSR is updated. d) Verify that the CSO declaration has been already issued by PMA e) Verify that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. f) Review the Annual SSAS Test confirmation issued by the Flag. **Note:** The items c, d, e and f are not mandatory during the interim verification however, during the initial verification the ISPS auditor shall assure that all mentioned points above have been fulfilled and must be indicated in the audit report.	• DOC • SMC • **Interim ISSC** • Initial Verification Audit report duly signed and stamped. • SSP Approval Certificate or SSP Approval Letter. • **CTR – A valid Conformance Test Report (will be verified)** • Payment receipt by this Administration or Panamanian Consulate for $250.00 + Handling fee

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ISPS CERTIFICATION GUIDANCE (SCENARIOS)

15	Intermediate verification in advance	Intermediate Verification on board	1. The intermediate verification shall include inspection of the security system and any associated security equipment of the vessel.	a) The auditor shall endorse the existing certificate. b) Verify that the CSR already issued by PMA. c) Verify that the CSO declaration has been already issued by PMA. d) Verify the Annual SSAS Test confirmation by the Flag. e) Verify that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133.	• The RSO should contact the administration isps@amp.gob.pa to coordinate the following scenarios established in ISPS Code/Reg.19.3.7 1. If the expiry date shown on the certificate shall amended by endorsement to a date which shall not be more than three years later than the date on which the intermediate verification was completed. 2. The expiry date may remain unchanged provided one or more additional verifications are carried out so that the maximum intervals between the verifications prescribed by section 19.1.1 are not exceeded.

ANNEX 1

ISPS CERTIFICATION GUIDANCE
(SCENARIOS)

16	Renewal verification in advance	Renewal verification on board	Verify the compliance of the ISPS code on board.	a) The auditor shall endorse the existing certificate or issue aShort Term. b) Verify that the CSR already issued by PMA. c) Verify that the CSO declaration has been already issued by PMA. d) Verify that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. e) Verify the Annual SSASTest confirmation issued by the Flag.	• DOC • SMC • **ISSC endorsed** • ISPS intermediate audit report. • SSP Approval Certificateor SSP Letter. • **CTR – A valid Conformance Test Report (will be verified)** • Payment Receipt by this Administration or Panamanian Consulate for $250.00 + Handling fee **Note:** The new Full Term ISSCshall be valid from the date of completion of the renewal verification.

ANNEX 1

ISPS CERTIFICATION GUIDANCE (SCENARIOS)

17	Harmonizing	Initial verification on board	1. Verify that the SSP is being effectively implemented on board. 2. Amend SSP Approval Letter (If applied)	a) Verify that the CSR already issued by PMA. b) Verify that the CSO declaration has been already issued by PMA. c) Verify that the SSAS equipment already configured with the following account threat@amp.gob.pa, according to the MMC-133. d) Verify the Annual SSAS Test confirmation issued by the Flag.	• DOC • SMC • **A statement issued bythe RSO.** • Initial Verification Audit report • SSP Approval Certificateor SSP Approval Letter. • ISM verification audit report. • **CTR – A valid Conformance Test Report (will be verified)** • Payment Receipt by this Administration or Panamanian Consulate for $250.00 + Handling fee **Note:** To request the re-issue of the Full term ISSC must to select the option Harmonizing through the online platform.

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ISPS CERTIFICATION GUIDANCE
(SCENARIOS)

18	ISPS intermediate endorsed by PMA as request of the customer	Intermediate verification audit	The intermediate verification shall include inspection of the security system and any associated security equipment of the vessel.		• **ISSC endorsed** • Intermediate Verification Audit report • SSP Approval certificate or letter. • **CTR – A valid Conformance Test Report (will be verified)** • Payment Receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee
19	ISSC Duplicate For Loss or Damage	Apply through the online platform			• ISPS intermediate verification (If apply) • **CTR – A valid Conformance Test Report (will be verified)** • Payment Receipt by this Administration or Panamanian Consulate for $100.00 + Handling fee
20	Interim ISSC for vessel of New Construction	Apply through the online platform			• Dry Dock letter confirmation • Letter ensuring that the SSP is Under Development by the RSO. • Payment Receipt by this Administration or Panamanian Consulate • for $150.00 + Handling fee

Notification form for Transfer of ISPS Certification

To Panama Maritime Authority

Application Date	

1. VESSEL/COMPANY INFORMATION

Name of Ship			
IMO No.		Call Sign	
ISPS Certification No.		Issued by	
SSP: ☐ Approved by		/ ☐ Submitted to	

Company Name Address	
IMO Company Identification Number :	
*Please enter the name and IMO No. of Company indicated on the DOC	

2. RSO INFORMATION

RSO Losing Society:
RSO Gaining Society:

3. SHIPBOARD AUDIT REQUEST

Audit	Initial	Intermediate	Renewal	Additional
ISPS	☐	☐	☐	☐
Date of Audit:				
Port of Audit:				

_____

Person in charge
Recognized Security Organization
(Stamp or signature)