

# Merchant Marine Circular

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

## MERCHANT MARINE CIRCULAR MMC-238

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

**Subject:** Ship Protection Measures for Vessels transiting High Risk Areas.

**Reference:** Law No. 38 June 4th, 1995 UNCLOS 1982.  
MMC-206 - Recognition of Company Security Officers (CSO).  
MMC-208 - Internationally Recommended Transit Corridor (IRTC) and Compliance with the Best Management Practices (BMP).  
MMC-228 - Use of Armed Security Personnel on board Panama Flagged Vessels (**online application**).  
MMC-230 - High Risk Areas (HRA) and precautionary zones.  
MMC-245 - Authorized Private Maritime Security Companies (PMSC) transiting High Risk Areas (**online application**).  
MMC-249 - Compliance with Long Range Identification and Tracking (LRIT) regulations

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1. The Administration urges Companies, Company Security Officers (CSO), Ship Security Officers (SSO) and Private Maritime Security Companies (PMSC) of Panamanian flagged vessels to implement the necessary security measures described in the latest edition of the Best Management Practices (please visit Maritime Security link <https://panamashipregistry.com/maritime-services/maritime-security/>, (ANTIPIRACY) before, during and after the transit through High Risk Areas.

2. The use of Best Management Practices must be reviewed and implemented by all the parties involved prior to entering high-risk areas. The implementation of BMP must include, but is not limited to the following:

- a) Conduct trainings / drills with the crew;
- b) Watchkeeping and Enhanced Vigilance;
- c) Effective use of monitoring and/or surveillance equipment;
- d) Maneuvering practice;

# Merchant Marine Circular

- e) Alarm or Alerts systems to demonstrate awareness to any potential attacker;
  - f) Use of deck lighting and illumination to demonstrate awareness to any potential attacker;
  - g) Denial of use of ship's tools and equipment, and protection of equipment stored on the upper deck;
  - h) Control of Access to Bridge, Accommodation and Machinery Spaces and Physical Barriers;
  - i) Other equipment used for self-defense; and
  - j) Safe-Muster Points and Citadels, if determined appropriate.
  - k) Submit vessel movements and transit plans to MSCHOA and all other organizations in the area before, during and after transiting High Risk Area.
- 3.** The Ship-owners, Ship-operators, must make sure the crew is familiarized with all the recommendations given in the BMP and by this Administration. They must also communicate with crew relatives before entering High Risk Area in order to make them aware of the transit and must also provide them with the contact on the different organizations which operate in the area so they can communicate with these organizations in case there is a need to do so.
- 4.** All the Private Maritime Security Companies (PMSC) listed in the MMC-245, must ensure compliance with Best Management Practices and coordinate with the master and crew that all exercises are planned and conducted on board prior to entering the High Risk Area and these measures must be kept before, during and after the transit.
- 5.** All Panamanian flagged vessels whether using or not the services of Private Maritime Security Companies should maintain a wide communication with the Administration and to liaise with the International Contact Centers according to the BMP in order to counter piracy in the High Risk Areas of the Gulf of Aden, Indian Ocean and any other Region of High Risk, as determined by this Administration before, during and after the transit. For this reason, we strongly encourage all Panamanian flagged vessels to complete and submit the "Vessel Position Reporting Form" to UMKTO, and the "Vessel Movement Registration Form" to MSCHOA, both described in the latest edition of the Best Management Practices (BMP) prior to entering the High Risk Area, including the International Recommended Transit Corridor (IRTC).
- 6.** All Panamanian flagged vessels transiting High Risk Area must make sure their LRIT System works properly at all times and must also report all their movements.



# Merchant Marine Circular

7. All inquiries concerning international correspondence must be sent to the Maritime Ship Security Department to the following e-mail address:

## MARITIME SHIPS SECURITY DEPARTMENT

[asp@amp.gob.pa](mailto:asp@amp.gob.pa)

Monday to Friday

Phones (+507) 501-5368 / 5037 / 5256

## SEGUMAR OFFICE

[authorizations@segumar.com](mailto:authorizations@segumar.com)

Weekends and Holidays

Phones (+507) 501-5350 / 5348 / 5032

## ABSOLUTE MARITIME TRACKING SERVICES, INC.

Phone (+507) 301-5748

[info@panama-ssas.com](mailto:info@panama-ssas.com)

**March, 2023** – CANCELLED. The circular MMC-230 supersedes this circular.

**February, 2022** – Change of email address and Maritime Security Link.

**December, 2020** – Change of PMA phone numbers.

**June, 2019** – Refers in paragraph 1 to Maritime Security link.

**July, 2018** – Change in the hyperlink documentation of paragraph No. 1.

**March, 2014** – Addition of new paragraph in point 5.

**August, 2013** – Changes all throughout the text.

**April, 2012.**

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

Maritime Ships Security Department  
General Directorate of Merchant Marine  
Panama Maritime Authority

Phone: (507) 501-5368 /5037

E-mail: [asp@amp.gob.pa](mailto:asp@amp.gob.pa)

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