

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-128

To: Master, Ship-owners, Operators, Company Security Officers, Ship Security Officer, Legal Representatives of Panama Flagged Vessels, Recognized Security Organizations (RSO) of Panama Flagged Vessel.

Subject: Security Levels and Declaration of Security (DoS).

Reference: Law No. 38 June 4th, 1995 UNCLOS 1982.
Resolution ADM No. 140-2003 of May 15th, 2003.
MMC-125 SHIP SECURITY PLAN (SSP).
MMC-126 SHIP SECURITY OFFICER (SSO).

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1. The purpose of this Merchant Marine Circular is to update the responsibilities of the ship-owner, company, operator, master, Company Security Officers (CSO) and Ship Security Officers (SSO) of the Panamanian vessels to implement in the Ship Security Plan (SSP) the necessary security measures at different security levels in accordance with Chapter XI-2, Part A and the relevant provisions of Part B of the ISPS Code.
 2. The SSP should include procedures and security measures for interfacing with ports, vessels, platforms and facilities. The Company Security Officer (CSO) and the Ship Security Officers (SSO) are encouraged to contact the Port Facility Security Officer (PFSO) and develop a close working relationship.
 3. **Definitions:**
 - 3.1. **Company:** The owner of the ship or any other organization or person such as the manager, or the bareboat Charterer, who has assumed the responsibility for the operation of the ship from the ship owner and who assuming such responsibility, has agreed to do so in writing.
 - 3.2. **Company Security Officer (CSO):** The person ashore designated by the Company to develop and revise the SSP and for liaison with the SSO, PFSO and the Flag Administration.

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- 3.3. **Declaration of Security (DoS):** Provides the means to ensure that critical security concerns are properly addressed prior to and during a vessel to facility or vessel to vessel interface.
 - 3.4. **Port Facility Security Officer (PFSO):** The person at the Port Facility designated by the facility to be responsible for implementation of measures required by the ISPS Code.
 - 3.5. **Port Facility Security Plan (PFSP):** A plan developed to ensure the application of measures designed to protect the port facility and ships, persons, cargo, cargo transport units and ship's stores within the port facility from the risks of a security incident.
 - 3.6. **Security Incident:** Any suspicious act or circumstance threatening the security of a ship, including pirates attack or armed robbery against ships.
 - 3.7. **Security Level:** The qualification of the degree of risk that a security incident will be attempted or will occur.
 - 3.8. **Security Level 1:** The level for which minimum appropriate protective and preventive security measures shall be maintained at all times.
 - 3.9. **Security Level 2:** The level for which appropriate additional protective and preventive measures shall be maintained for a period of time as a result of heightened risk of a security incident.
 - 3.10. **Security Level 3:** The level in which further specific protective and preventive measures shall be maintained for a period of time when a security incident is probable or imminent, although it may not be possible to identify the specific target.
 - 3.11. **Ship Security Plan (SSP):** A plan developed to ensure the application of measures onboard the ship designed to protect persons onboard, the cargo, cargo transport units, ship's stores or the ship from the risks of a security incident.
 - 3.12. **Ship Security Officer (SSO):** The person on board the ship accountable to the master, designated by the Company as responsible for the security of the ship, including implementation and maintenance of the SSP and for the liaison with the Company Security officer (CSO) and the Port Facility Security Officer (PFSO).
4. When a Panamanian flagged vessel has a Security Level which is lower to the level established in the next port of call, then the Ship Security Officer will inform of the situation to the CSO and the Security Level of the vessel will proceed to increase to the one established by the Port facility.

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5. When a Panama flagged vessel has a Security Level which is higher to the level established in the next port of call, then the SSO and CSO will contact the PFSO and inform him about the situation in order to complete the Declaration of Security (DoS).
6. According to the ISPS Code provisions the Declaration of Security (DoS) has the purpose to ensure an agreement between the ship and the port facility or with other ships with which it interfaces as to the respective security measures each of them will undertake in accordance with the provisions of their respective approved security plans.
7. This Administration encourages all the Companies of Panamanian flagged vessels to complete a Declaration of Security (DoS) when:
 - 7.1. The ship is operating at a higher security level than the port facility or another ship it is interfacing with.
 - 7.2. There has been a security threat or security incident involving the ship or involving the port facility, as applicable.
 - 7.3. The ship is at a port which is not required to have and implement an approved port facility security plan.
 - 7.4. The ship is conducting ship-to-ship activities with another ship not required to have and implemented an approved security plan.
 - 7.5. When the Ship Security Plan (SSP) provides any other measures.
8. The Declarations of Security (DoS) shall address the security requirements that could be shared between a port facility and ship (or between ships) and shall state the responsibility for each and shall be acknowledge by the applicable port facility or ship.
9. This Administration recommends all Panama flagged vessels to keep onboard the record of Declarations of Security (DoS) for the period of time indicated in the Ship Security Plan (SSP), or in the procedures of the Company. If this is not duly stated in neither of the mentioned documents, then the Declarations of Security (DoS) must be kept for a period covering at least the previous 10 calls at Port Facilities, which they apply, complete and sign a Security of Declaration and will use the model given in the Appendix of Part B, according to the ISPS Code and Ship Security Plan (SSP) in order to avoid any PSC deficiencies.
10. Any change of security level, or implementation of security measures is to be advised by e-mail to securitylevel@amp.gob.pa



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11. All the Panamanian flagged vessels transiting through High Risk Areas have to raise their Security Level according to their Ship Security Plan (SSP).
12. In case you need more information about the current security level in any port, we strongly recommend you please contact directly your local agent in such port, this Administration only provides information about the security levels in the Panamanian ports, which is available at www.panamashipregistry.com in the Security Level link.
13. To obtain more information about the recommendations of the Panama Maritime Authority regarding this subject matter, please visit the website www.panamashipregistry.com in the section named "Circulars" which contains the Merchant Marine Circulars No. 208, 230, 234, 238 and 249, for your easy reference.
14. Any inquiry about this topic must be sent to the Maritime Ship Security Department to isps@amp.gob.pa.

For further assistance, please note below the contact points.

August, 2023 – CANCELLED.

May, 2021 – Modification paragraph 12 and 14.

December, 2020 – Modification paragraph 13 and Changes of PMA telephone numbers and email.

June, 2017 – Changes in paragraph 10 and 11 (E-mail address).

September, 2015 - Changes in paragraph 12 and inclusion of two new paragraphs.

June, 2013 – Changes all throughout the text

September, 2003

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

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

Phone: (507) 501-5086 / 85

E-mail: securitylevel@amp.gob.pa

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