

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-340

- To:** Owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates and Recognized Organizations (ROs).
- Subject:** Application of Annex 14 of the Code of Safe Practice for Cargo Stowage and Securing (CSS Code).
- Reference:** Resolution No. 106-OMI-179-DGMM of October 20, 2016 adopted MSC.1/Circ.1352/Rev.1 of December 15, 2014, Annex 14 of the CSS Code (Guidance on Providing Safe Working Conditions for Securing Containers on Deck) (**Only as Recommendation**).

1. This Merchant Marine Circular replaces **MMC-42**.

2. Purpose:

The purpose of this Merchant Marine Circular is to communicate and offer guidance to Ship-owners, Operators, Masters and Recognized Organizations on the application of the new Annex 14 of the CSS Code for new and existing ships designed and fitted for the carriage of containers on deck, relating to the "Guidance on Providing Safe Working Conditions for Securing of Containers on Deck".

3. Scope:

This circular applies to Panamanian Registry Vessels.

4. Considering that MSC.1/Circ.1352/Rev.1 of December 15, 2014, was adopted by this Administration through Resolution No. 106-OMI-179-DGMM of October 20, 2016, and that member governments were invited to apply sections 4.4 (Training and familiarization), 7.1 (Introduction), 7.3 (Maintenance) and section 8 (specialized container safety design) to existing containerships; as well member governments were also invited to apply the

principles of the guidance contained in section 6 (Design) and 7.2 (Operational Procedures), to existing container ships as far a practical, with the understanding that existing ships would not be required to be enlarged or undergo other major structural modifications, this Administration instructs as follows:

Merchant Marine Circular

- 4.1 New container ships:** the keels of which are laid on or after July 1, 2017, shall apply the new Annex 14 of the CSS Code entirely.
- 4.2 Existing container ships:** the keels of which were laid or which are at a similar stage of construction before July 1, 2017, shall apply Section 4.4 (Training and familiarization), Section 7.1 (Introduction), Section 7.3 (Maintenance) and Section 8 (Specialized Container Safety Design) of new Annex 14 by the first survey related to the Safety Construction Certificate on or after July 1, 2018; and
- 4.3** Ship-owners, Operators of existing ships must apply the principles of relevant guidance contained in the new Annex 14, section 6 (Design) and section 7.2 (Operational Procedures), as far as practicable, with the understanding that existing ships would not be required to be enlarged or undergo other major structural modifications as determined by the flag State Administration. As a minimum existing container ships the keel of which were laid or which are at a similar stage of construction before July 1, 2017 shall comply with the following requirements, by their first scheduled dry-docking on or after July 1, 2018, but not later than July 1, 2023:
1. As a minimum, a platform should be provided on which to work safely. This platform should have fencing to prevent workers falling off it.
 2. The space provided between the containers stows for workers to carry out lashing operations are to provide:
 - a firm and level working surface;
 - a working area, excluding lashings in place, to provide a clear sight of twistlock handles and allow for the manipulation of lashing gear;
 - sufficient spaces to permit the lashing gear and other equipment to be stowed without causing a tripping hazard;
 - sufficient spaces between the fixing points of the lashing bars on deck, or on the hatch covers, to tighten the turnbuckles;
 - access in the form of ladders on hatch coamings
 - safe access to lashing platforms;
 - protective fencing on lashing platforms; and
 - adequate lighting to carry out the work safely.
 3. All relevant deck surfaces used for movement about the ship and all passageways and stairs are to have non-slip surfaces.
 4. Walkways on deck are to be delineated by painted lines or otherwise marked by pictorial signs, where necessary for safety.
 5. All relevant deck surfaces used for movement about the ship and all passageways and stairs should have non-slip surfaces.



Merchant Marine Circular

6. All protrusions in access ways, such as cleats, ribs and brackets that may give rise to a trip hazard are to be highlighted in a contrasting color.
7. Toe boards (or kick plates) are to be provided around the sides of elevated lashing bridges and platforms to prevent securing equipment from falling and injuring people.
8. Any openings in the lashing positions through which people can fall are, if possible, to be closed.
9. Fences and handrails are to be highlighted with a contrasting color to the background, where possible.
10. Aftward ship's cargo securing walkways are to be protected by adequate fencing if an unguarded edge exists when the hatch cover is removed.
11. Handholds are to be provided at the top of the ladder to enable safe access to the platform to be gained.
12. Manhole openings that may present a fall hazard are to be highlighted in contrasting color around the rim of the opening.
13. There should be no unprotected openings in any part of the workplace. Access opening must be protected with handrails or access covers that can be locked back during access.
14. Where it is not feasible to entirely eliminate working on the tops of container stows, the twist lock designs used should minimize the need for such working;
15. Bins or stowage places for lashing materials should be provided.
16. All lashing gear should be stowed as close to its intended place of use as possible.
17. The stowage of securing devices should be arranged so they can easily be retrieved from their stowage location.
18. Bins for faulty or damaged gear should also be provided and appropriately marked.
19. Bins should be of sufficient strength.
20. Bins and their carriers should be designed to be lifted off the vessel and restowed.
21. Illumination should, where possible, be designed as a permanent installation and adequately guarded against breakage; and



Merchant Marine Circular

- 22. Illumination intensity should take into consideration the distance to the uppermost reaches where cargo securing equipment is utilized.
- 23. The maximum length of a lashing rod are to be sufficient to reach the bottom corner fitting of a container on top of two high cube containers and be used in accordance with the instructions provided by the manufacturers.
- 4.4 Personnel engaged in containership cargo operations should be familiarized with the ship's unique characteristics and potential hazards arising from such operations necessary to carry out their duties. Training should include situational awareness to identify and avoid hazards.
- 4.5 Shipowners, Operators of existing ships are encouraged to include procedures for cargo safe access plan (CSAP) in accordance with Chapter 5 of MSC.1/Circ.1353/Rev.1
- 4.6 Notwithstanding the above compliance, ROs are requested to inform ship owners that differing requirements could have been implemented by port and terminal operators. Ship-owners should be advised to enquire with the competent authorities of the ports which their ships are calling on any additional requirements.

October, 2023 – Contact information was updated; phone number “4238” was deleted.

May, 2021 - References were updated.

August, 2020 – This Merchant Marine Circular replaces MMC-42, new paragraph was added, Paragraph #1.

March, 2017.

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

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