

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-204

- To:** Ship-owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates, Recognized Organizations (RO), Regional Offices, Manning Agencies, Nautical Inspectors, Shipping Companies, Recognized Trainings Organizations.
- Subject:** Outside Ship's Bottom inspection and Dry docking Interface Periods for Panamanian Flagged Vessels.
- References:** **a)** Law No. 7 of October 27, 1977, (SOLAS) Convention as amended;
b) Resolution MSC.204(81) of May 18, 2006, adopted through Resolution No.106-OMI-01-DGMM of October 18, 2007;
c) Resolution A.1186(33) of December 6, 2023 - Survey Guidelines under the Harmonized System of Survey and Certification (HSSC), 2023; adopted through Resolution 107-OMI-287-DGMM of February 29, 2024.

1. This Circular supersedes **MMC-141** and **MMC-116**.

2. Purpose

2.1 This Circular has the purpose to clarify on the inspection of the outside of the ship's bottom. The instructions described in this circular have been prepared considering the Survey Guidelines under the Harmonized System of Survey and Certification, 2023 set out in the annex of the Resolution A.1186(33) and further considerations of the Panama Maritime Authority.

3. Scope

- 3.1. Inspection of the outside of the ship's bottom is required for all cargo ships under the SOLAS 74/88 regulations I/10(a)(v) and 10(b)(v).
- 3.2. Inspection of the outside of a passenger ship's bottom are also required under SOLAS Convention.



Merchant Marine Circular

3.3. According to the corresponding national legislation the following vessels are subject to inspection of the outside of the ship's bottom:

- 3.3.1. Cargo vessels of less than 500 Gross Tonnage,
- 3.3.2. Fishing vessels of 24 meters in length and above,
- 3.3.3. Fishing vessels of less than 24 meters in length,
- 3.3.4. Vessel Operating Exclusively on Panamanian Jurisdictional Waters

4. Definitions

The following definitions shall be considered:

- 4.1. **"An inspection of the outside of the ship's bottom"** is an inspection of the underwater part of the ship and related items to ensure that they are in a satisfactory condition and fit for the service for which the ship is intended" (Refer to Res.A.1186(33)).
- 4.2. **"Any five-year period"** is the five-year period of validity of the Cargo Ship Safety Construction Certificate or the Cargo Ship Safety Certificate." Res.A.1186 (33). However, for this Administration, in case of ships less than 500 gross tonnage "any five-year period" is the five-year period of validity of the International Load Line Certificate.
- 4.3. **"Related items"** mean those items which may only be inspected when the ship is in dry dock or undergoing an in-water examination of the outside of its bottom. For oil tankers, chemical tankers and gas carriers, this may mean that the ship has to be specially prepared by, for example, being cleaned and gas freed. Then the survey of items such as the internal examination of cargo tanks, as referred to in (CIn) 2.3.2 and (CIn) 2.3.3 in annex 1 of the HSSC, 2023 guidelines may be undertaken at the same time.

5. Outside ships bottom inspections

- 5.1. Outside ship's bottom inspections are to be attended by a surveyor from a Recognized Organization. The Administration may request at any time the survey report and any related documentation used for the analysis and evaluation of the ship's conditions.
- 5.2. The Panama Maritime Authority inform to all Ship Owners/ Operators, Legal Representatives and Recognized Organizations that the **outside ship's bottom inspection** periods for the Panamanian Flag registered ships, are as follows:
- 5.3. Inspections of the outside of the ship's bottom of cargo vessels of 500 Gross Tonnage and above:

Merchant Marine Circular

- 5.3.1. Cargo vessels of 500 Gross Tonnage and above in accordance with the International Convention for the Safety of Life at Sea 74 as amended (SOLAS) regulation I/10(a)(v), all ships in possession of a Cargo Ship Safety Construction Certificate requires a minimum of two inspections of the outside ship's bottom during the five year period of validity of its certificate, except where SOLAS 74/88 regulation 14 (e) or 14(f) is applicable.
- 5.3.2. As it is indicated in "Survey Guidelines under the harmonized system of survey and certification (HSSC)":
- i. One of such inspections should be carried out on or after the fourth annual survey in conjunction with the renewal of the Cargo Ship Safety Construction Certificate. Where regulation SOLAS 74/88 regulation 14 (e) or (f) is applicable, this five-year period may be extended to coincide with the extended period of validity of the certificate. In all cases the interval between any two such inspections shall not exceed 36 months.
 - ii. The inspection of the outside of the ship's bottom and the survey of **related items**, should include an inspection to ensure that they are in a satisfactory condition and fit for the service for which the ship is intended.
 - iii. Inspections of the outside of the ship's bottom should normally be carried out with the ship in a dry dock (out of water). However, consideration may be given to alternate inspections being carried out with the ship afloat,
 - iv. Special consideration should be given before ships of 15 years of age and over other than bulk carriers and oil tankers are permitted to have such surveys afloat.
 - v. Inspection of the outside of the ship's bottom of bulk carriers and oil tankers of 15 years of age and over should be carried out with the ship in dry dock.
 - vi. Inspections with the ship afloat should only be carried out when the conditions are satisfactory and the proper equipment and suitably trained staff are available.
 - vii. For ships subject to enhanced survey, the provisions of paragraph 2.2.22 of the applicable part of annex A or B of the International Code on the Enhanced Programme of Inspections during Surveys of Bulk Carriers and Oil Tankers, 2011 (2011 ESP Code) adopted by resolution A.1049(27), as amended, should apply.
 - viii. Where an inspection of the ship's bottom has not been carried out before the due dates, reference should be made to 5.6. of the HSSC Guidelines.
- 5.3.3. Therefore, for **ships less than 15 years of age other than bulk carriers and**



Merchant Marine Circular

oil tankers, alternate inspections being carried out with the ship afloat might be carried out in cases where the RO/Class consider that is proper and reasonable to do so; in such cases this Administration shall be informed for our records.

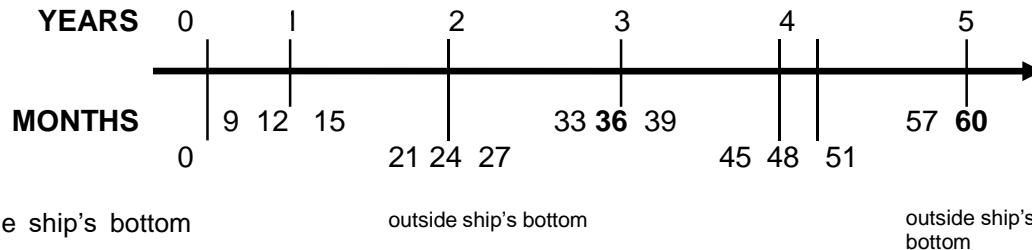
- 5.3.4. *Ships of 15 years of age and over others than bulk carriers and oil tankers*, shall be subject to special consideration by this Administration for permitting that bottom surveys are carry out afloat (in water); therefore, a case-by-case basis evaluation is required from the RO/Class and by SEGUMAR Technical Offices with the purpose to authorize it or not.**
- 5.3.5.** Therefore, this Administration shall evaluate this on a case-by-case basis, considering the recommendations from the RO/Class.
- 5.3.6.** Refer to the Guidelines for pre-planning of surveys in dry dock of ships which are not subject to the enhanced programme of inspections (MSC.1/Circ.1223).
- 5.3.7.** In case of ships subject to IACS Extended Dry Dock Scheme, the Administration may permit alternate inspections of the ship's bottom afloat, provided it is demonstrated that ship is subject to an approved comprehensive planned maintenance system for the hull as well as for machinery. In addition, the ship must be fitted with a shaft bearing and sealing system of approved design with implementation of regular monitoring procedures, acceptance to these cases is only permitted IACS directly. Refer to MM-06/2022 – Extended dry-docking (EDD) Scheme.
- 5.3.8. *However, in case of Oil Tankers and Bulk carriers less than 15 years of age*, alternate inspections of the ship's bottom not conducted in conjunction with the Renewal Survey of the Cargo Ship Safety Construction Certificate may be carried out with the ship afloat (in water), as it is indicated in paragraph 2.2.2 of applicable part of annex A or B of 2011 ESP Code.**
- 5.3.9.** All inspections with the ship afloat (in water) should only be carried out when the conditions are satisfactory, and the proper equipment and suitably trained staffs are available.
- 5.3.10. *Inspection of the outside of the ship's bottom of **bulk carriers and oil tankers of 15 years of age and over** should be carried out with the ship in dry dock*** (out of water), as it is indicated in paragraph 2.2.2 of applicable part of annex A or B of 2011 ESP Code.
- 5.3.11.** According to the HSSC Guidelines when extending the period between inspections of the outside of the ship's bottom (Reference: SOLAS 74/88 regulation 1/10(a)(v)):
- 5.3.12. *This permits the period of five years in which two inspections of the ship's bottom are to be carried out to be extended when the Cargo Ship Safety***



Merchant Marine Circular

Construction Certificate is extended under regulation I/14(e) and (f). However, no extension should be permitted on the period of 36 months between any two such inspections. If the first ship's bottom inspection is carried out between 24 and 27 months, the 36-month limitation may prevent the certificate being extended by the periods permitted in regulation I/14(e) and (f).

Explained as follows:



i) A certificate ceases to be valid if the inspection of the outside of the ship's bottom is not completed within the periods specified above. The validity of the certificate should be restored by carrying out the appropriate survey which, in such circumstances, should consist of the requirements of the survey that was not carried out, but its thoroughness and stringency should have regard to the period of time beyond the survey due date (authorization for conditional certificate and prompt revalidation should be requested to Segumar Offices). The Administration will require detailed description why the survey was not carried out within its lapse of time and consider further action, if necessary. Additional conditions may apply to ships in this circumstance.

5.4. Cargo vessels of less than 500 Gross Tonnage:

5.4.1. Irrespective of the navigation area this group of ships shall be subject to a minimum of two outside ship's bottom inspections during **any five-year period of validity of the International Load Line Certificate**, following the same instructions applicable to Cargo vessels of 500 Gross Tonnage and above. The required inspections of the ship's bottom for the renewal surveys of the Cargo Ship Safety Certificate under the provisions of the Resolution No.106-138-DGMM of September 10, 2013 could be carried out with the ship afloat.

5.4.2. Authorization from this Administration shall be requested to SEGUMAR Offices to carryout an alternate inspection with the ship afloat in case of **ship of 15 years of age and over, other than bulk carrier and oil tanker** (request will be analyzed thoroughly considering type, service and age of the ship).

5.5. Inspection of the outside of a passenger ship's bottom:

5.5.1. Irrespective of the navigation area passenger ships shall be subject to two outside ship's bottom inspection with the ship in a dry dock in a **five (5) year period**



Merchant Marine Circular

of validity of the International Load Line Certificate. (60 months). In all cases the period of time between these two bottom inspections in dry dock shall not exceed 36 months. The remaining bottom surveys of these ships can be carried out as in water surveys. Consecutive underwater surveys will be allowed for these ships.

5.5.2. The required inspections of the ship's bottom can be carried out with the ship afloat for the renewal surveys of the Passenger Ship Safety Certificate, provided that RO/Class responsible of this Certificate agrees to do so.

5.5.3. Inspections with the ship afloat should only be carried out when the conditions are satisfactory, the proper equipment and suitably trained staff is available, as well as previous authorization has been granted by this Administration through the SEGUMAR Offices in case of passenger ships of 15 years of age and over, as follows:

5.5.4. Operators of Panamanian Passenger ships will make the request for underwater survey in lieu of dry dock directly to the ship's Recognized Organization. The Recognized Organization will evaluate the request and, after considering all relevant information, should make a recommendation to this Administration (Segumar Offices). If the request is approved, the correspondent underwater examination will be carried according to the Recognized Organization procedures, using approved companies certified by them to do specific work and to the satisfaction of the attending surveyor.

5.6. Fishing vessels of 24 meters in length and above:

5.6.1. Irrespective of the navigation area shall be subject to a minimum of two inspection of the outside ship's bottom during the five-year period. The five-year period is defined by the Fishing Vessels Safety Certificate.

5.7. Fishing vessels of less than 24 meters in length:

5.7.1. Irrespective of the navigation area this group of vessels shall be subject to a minimum of two inspection of the ship's outside during any five year period.

5.8. Vessel Operating Exclusively on Panamanian Jurisdictional Waters:

5.8.1. For every vessel holding an International Navigation Registry Certificate, operating exclusively within jurisdictional waters of the Republic of Panama, and regardless of service and tonnage, the two (2) inspections of the outside of the ship's bottom, during any five (5) year period, shall be carried out with the ship in dry dock.

5.8.2. Notwithstanding the above mentioned, this Administration, through SEGUMAR offices could authorize to replace the intermediate outside ship's bottom survey by an in-water survey, for ships operating exclusively within the jurisdictional waters



Merchant Marine Circular

of the Republic of Panama after evaluation of criteria such as vessel age, type of service, maintenance checks of ships. This authorization could only be granted on a case-by-case basis by Segumar Offices.

April 2024 – Amendments throughout the text.

February, 2022 – definitions added, changed subject, references, purpose and paragraphs 1.5, i), 2.1 and 4.1 amended.

June, 2019 – 1.1 to 1.9 completely revised, insertion in paragraphs I ii), 2.1, 2.2, 3.1., 3.2, 3.3, 3.3.1 and 6.2, previous sub-paragraphs were re-numbered.

April, 2019 – References on top updated, 2.1 amended referring to Resolution 106-138-DGMM of September 10, 2013,

April, 2014 – 1.6 added from separating paragraphs contained in 1.5, paragraph 1.6 renumbered 1.7.

January, 2012 - Change of format and addition of point 6.

August, 2010 - Change of format and addition of point 6.

July 2009.

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

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