



CIRCULAR

Panama Policy on ISM Code Implementation

C26023 | 14 April 2026

Notice to: Ship Owners / Managers / Operators / Surveyors / Auditors

The Panama Maritime Authority has revised Merchant Marine Circular [MMC-176](#), which establishes the policy for implementing the International Safety Management (ISM) Code.

The Circular provides a framework for additional verifications to ensure that safety management systems are active and effective in identifying hazards and reducing risks to a level that is As Low As Reasonably Practicable (ALARP), and is a reminder to all stakeholders of their responsibility to maintain a proactive safety culture to achieve the Code's objectives of maritime safety and pollution prevention.

Panama Circular MMC-176 replaces MMC-95, MMC-97, MMC-100, MMC-115, MMC-160, MMC-176 and MMC-213.

DBS Circular C23055 is superseded by C26023.

Points to Note:

ISM Additional Verifications Procedure:

The Administration may require additional verification to check if the safety management system (SMS) still functions effectively, where there are clear grounds, such as:

- **Port State Control Detentions:** Any instance where a vessel is detained by authorities,
- **Reactivation of Operations:** When a vessel returns to service after an extended period out of service or interrupted operations.
- **Corrective Action Validation:** To verify that effective corrective actions have been properly implemented and remain functional.

In addition to the IMO Guidelines, Additional Verifications are mandated in the following cases:

- **Reported Deficiencies:** When reports indicate deficiencies that may negatively impact the implementation of the ISM Code on board.
- **Major Non-Conformities:** Any non-conformities identified for immediate downgrade and follow-up.

Additional Audit required in case of Port State control detentions, including deficiencies indicating systematic failures of the Safety Management System (ISM)

Additional verifications are to be carried out at the port where the ship is detained, and the scope and depth of the verification are to be as per an **initial verification**.

The Port State Control Report is to be presented in case of detentions or ISM-related deficiencies.

Requests for additional verification due to Port State Control detentions are to be sent to

- ism@amp.gob.pa,
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

The RO responsible for ISM Certification is to carry out the additional verification after authorization has been received.

On satisfactory completion of the shipboard assessment, the Safety Management Certificate is to be endorsed for additional verification.

The Class Society/RO is to submit a copy of the additional verification report as soon as possible to the Administration, along with the corrective actions plan (CAP) addressing the non-conformities once the Recognised Organisation has agreed on the corrective actions, to:

- ism@amp.gob.pa
- authorizations@segumar.com and
- internationaloffices@segumar.com

Corrective actions, preventive actions, additional verifications and any subsequent audits (follow-up) are to be completed within the agreed time period, which should not normally exceed three (3) months.

After corrective actions are taken and additional verification has been carried out, a follow-up audit is to be carried out to verify the effectiveness of the actions taken within the agreed time frame.

The RO(s) responsible for the Safety Management Certificate (SMC) and Document of Compliance (DOC) are to ensure that the Company applies for the follow-up audits as agreed.

Follow-up audit authorizations after detentions are to be requested from:

- ism@amp.gob.pa
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Confirmation of the effectiveness of actions implemented is to be provided to:

- ism@amp.gob.pa
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Failure to take adequate corrective actions per the ISM Code, including measures to prevent recurrence, will be considered as a major non-conformity affecting the validity of the Document of Compliance and related Safety Management Certificates.

MMC-156, 404 and 405 give further information regarding ships under certain risk levels.

Additional Audit required in the case of reactivation after the interruption of operations of the ship and its SMS due to a period out of service

After the interruption of the SMS on board a ship, the Company is to review the SMS. Where a Company manages a ship which only operates seasonally, specific procedures for the lay-up period and reactivation are to be established, based on the commercial activities.

The Company should notify the port State or coastal State (if applicable) about the reactivation of the ship. This should include information about the time needed for reactivation, any change of ownership or Company, and the next intended destination after reactivation, e.g. normal trade, repair yard or scrap yard.

If the interruption period of the SMS on board the ship is between three (3) and six (6) months, an additional verification (under the scope of an intermediate verification) is to be carried out before the ship restarts its operations.

If the interruption period of the SMS on board the ship is more than six (6) months, the Company is to request the RO responsible for ISM Certification to perform an interim verification before the ship restarts its operations.

Requests for additional verification due to reactivations are to be sent to:

- authorizations@segumar.com or
- the nearest SEGUMAR Office.

The RO responsible for the ISM Code Certification is to carry out the additional verification after individual authorization is given by SEGUMAR Offices.

On satisfactory completion of the shipboard assessment, the Safety Management Certificate (SMC) is to be endorsed for additional verification.

Where non-conformities are found, the RO is to submit a copy of the additional verification report as soon as possible, along with the corrective action plan approved by them, to:

- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Additional Audit required in case of reporting deficiencies possibly affecting the implementation of the ISM Code on board

Class Societies/ROs responsible for statutory and class certificates, when detecting deficiencies possibly affecting the implementation of the ISM Code on board during surveys, inspections related to statutory or class items or when deficiencies are raised due a Port State Control Inspection, are to report to the Administration at the earliest opportunity to:

- ism@amp.gob.pa
- authorizations@segumar.com or

- the nearest SEGUMAR Office.

The RO responsible for ISM Certification can be granted individual authorization (after evaluation) to carry out the additional verification.

On satisfactory completion of the shipboard assessment, the Safety Management Certificate is to be endorsed for additional verification.

The RO responsible for ISM Certification is to submit a copy of the additional verification report as soon as possible to the Administration, along with the corrective actions addressing the non-conformities to:

- authorizations@segumar.com and
- internationaloffices@segumar.com.

Corrective actions, preventive actions, additional verifications and any subsequent audits (follow-up) are to be completed within the agreed time period but should not normally exceed three (3) months.

After corrective actions are taken and additional verification has been carried out, a follow-up audit is to be carried out to verify the effectiveness of the actions taken within the time frame indicated in the agreed corrective action plan.

The RO(s) responsible for the Safety Management Certificate (SMC) and Document of Compliance (DOC) (ISM Code Certification) are to ensure that the Company applies for the follow-up audits on time.

Follow-up audits authorizations are to be requested to:

- ism@amp.gob.pa
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Confirmation of the effectiveness of actions implemented and follow/up audit reports are to be provided to:

- ism@amp.gob.pa
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Failure to take adequate corrective actions per the ISM Code, including measures to prevent recurrence, is to be considered as a major non- conformity affecting the validity of the Document of Compliance and related Safety Management Certificates.

ROs are encouraged to report possible systematic failures of the Safety Management System if there is an increase in hazardous occurrences related to the DOC.

If a major non-conformity is identified that relates to the effective functioning of the Safety Management System (SMS) or a serious threat to safety/environment is detected, and not corrected, the DOC is to be withdrawn with immediate notification to the Administration.

Additional audit in case of non-conformities found during ISM verifications

Requests for additional verification in case of non-conformities found during ISM verifications by ROs responsible for the ISM Certification are to be sent to:

- authorizations@segumar.com or
- the nearest SEGUMAR Office.

On satisfactory completion of the shipboard assessment, the Safety Management Certificate is to be endorsed for additional verification.

The RO responsible for the ISM Certification is to submit a copy of the additional verification report as soon as possible to the Administration, along with the corrective actions addressing the non-conformities to:

- authorizations@segumar.com and
- internationaloffices@segumar.com.

Corrective Action follow-up (Verifying the effectiveness of actions taken).

After corrective actions are taken and additional verification has been carried out, a follow-up audit is to be carried out to verify the effectiveness of the actions taken within the agreed time frame.

The RO(s) responsible for the Safety Management Certificate (SMC) and Document of Compliance (DOC) (ISM Code Certification) are to ensure that the Company applies in due time for the follow-up audits.

Follow-up audits authorizations for corrective action validation are to be requested to:

- ism@amp.gob.pa
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Confirmations of the effectiveness of actions implemented are to be provided to:

- ism@amp.gob.pa
- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Failure to take adequate corrective actions per the ISM Code, including measures to prevent recurrence, is to be considered as a major non-conformity affecting the validity of the Document of Compliance and related Safety Management Certificates.

Companies' responsibilities with regard to reporting and analyzing of non-conformities, observations, accidents and hazardous occurrences (near-misses)

The Company responsible for the operation of the ship is to ensure that the SMS contains procedures to guarantee that non-conformities, observations and hazardous occurrences are reported, recorded, investigated, evaluated, reviewed and analyzed, and that appropriate actions are taken.

These procedures involve the responsible management person (DPA) who is to properly monitor the **follow-up and closing-out** of the non-conformities/deficiency reports. The receipt of reports is to be acknowledged to those persons who have raised the reports. This includes the status of the report and any decisions made.

The Administration encourages Companies to report near-misses in their fleet. The report and analysis of such occurrences are essential for an effective risk assessment by the Company, especially where accident information is not available.

The system should ensure such reports are reviewed and evaluated by the responsible person(s), to determine appropriate corrective action and to ensure that recurrences are avoided.

Qualifications, training and experience of the Designated Person

To ensure the safe operation of each ship and to provide a link between the Company and those on board, every company, as appropriate, is to designate a person or persons ashore having direct access to the highest level of management.

The Administration instructs shipowners/operators of Panamanian flag vessels to comply with the guidance on the qualifications, training and experience for undertaking the role of Designated Person under provisions of the International Safety Management Code as set out in the Annex of the **MSC-MEPC.7/Circ.6** dated 19 October 2007.

The Administration reminds Companies to provide training courses covering qualification, training and experience and the appropriate procedures connected to compliance with the ISM Code, including practical training and continuous updating.

The Company is to maintain documentary evidence (records) that the Designated Person has the relevant qualifications, training and experience to undertake the duties under the provisions of the ISM Code.

Endorsement of ISM Code Declarations

All Company Operators/Owners/Masters are to report to the Administration, the Declaration of Company (DC) for the Company Operator, as per ISM Code 3.1, and the Declaration of the Designated Person Ashore (DPA).

The online application for the ISM Declarations (Declaration of Company – DC and Declaration of Designated Person Ashore – DPA) is available at <https://ecertificatespanama.amp.gob.pa>.

Recognized Organizations responsible for ISM Code Certification are to verify, during the initial, renewal, annual-DOC and intermediate-SMC verifications, that every DPA and DC has been endorsed by the Administration.

To obtain the required endorsement of the declaration of Designated Person Ashore and the Declaration of the Operating Company, a copy of the Interim or Short-Term Safety Management Certificate is to be provided.

ISM Declarations (Declaration of Company – DC and Declaration of Designated Person Ashore – DPA) issued without an electronic signature or QR Code remain fully valid until a modification or replacement is required.

Companies operating multi-flagged fleets

For companies with vessels under different flags, duplication of DOCs can be avoided by agreement of the Flag State Administrations involved. Companies should approach the relevant flag Administrations, proposing a plan of action and requesting agreement by all parties to facilitate the auditing and certification process. This plan should clearly state which entity (the Administration itself; a recognized organization authorized by the Administration; or at the request of the Administration, by another Contracting Government, according to SOLAS IX/4.1) is to conduct which part of the process.

This approach by companies should be taken at least 12 months prior to the mandatory application date for the particular ship type or types involved.

To facilitate the auditing and certification process and to avoid unnecessary duplication of work, a Company operating a multi-flagged fleet may approach the Administration to enter into a positive dialogue with other involved Administrations. Relevant agreements may be reached with other Administrations involved.

Where Companies operating a multi-flagged fleet and its major number of ships are under a DOC issued by a RO already approved by this Administration, a concurrence letter is to be requested from:

- authorizations@segumar.com or
- the nearest SEGUMAR Office.

Risk Assessment

Per the revised ISM Code, the Company is to establish safeguards against all identified risks. In consequence, Risk Management is to be a continual and flexible process consisting of hazard identification, risk assessment, control application, and effectiveness monitoring.

Risk assessments are to involve the operational staff most familiar with the tasks.

The company is reminded of its responsibility for informing relevant employees and those undertaking delegated safety management system tasks about the objectives and scope of the ISM Code certification.

As hazard identification must be systematic and based on the observation of activities, the Company is recommended to utilize "A Guide to Risk Assessment in Ship Operations" (IACS Rec. 127) as a reference standard for verifying compliance.

Penalties

Any Panamanian-flagged vessels not in possession of a valid SMC and company DOC will be subject to a severe fine, as set forth in Panama's Law No. 2. In addition, vessels not complying are subject to the maximum penalty imposed by the Registry.

Contact Points

ISM station Navigation and Maritime Safety Department:

Monday to Friday from **0830 to 1630** (Panama local time GMT-5)

Phone: (507) 501-5092

Email: ism@amp.gob.pa

Segumar Panama

Monday to Friday from 0600 to 2200 (Panama local time GMT-5)

Phone: (507) 501- 5361 / 5352 / 5360

Email: authorizations@segumar.com; segumar.headoffice@segumar.com; tec-pma@segumar.com.

Segumar International Offices:

Monday to Friday (according to local time and regular Office hours).

Refer to MMN018/2021 - SEGUMAR offices contact points (24/7 coverage).

Act now

Ship Owners/Managers/Operators/Surveyors/Auditors are to take note of the contents of Circular No. MMC 176 and be guided accordingly.