

Merchant Marine Circular

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

MERCHANT MARINE CIRCULAR MMC-382

- To:** Ship-owners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates and Recognized Organizations (RO's) and Recognized Security Organizations (RSO's).
- Subject:** Panama Policy on Remote Surveys for Recognized Organizations and Recognized Security Organizations.
- Reference:** Resolution J.D. No. 019-2005 of November 24, 2005.
Merchant Marine Circular No.159 - Control of the Issuance of Statutory Certificates.
Merchant Marine Circular No. 354 - Guidelines on Maritime Cyber Risk Management.
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1. Purpose

- 1.1. The purpose of this circular is to inform all Recognized Organizations (RO's) interested to obtain authorization to conduct surveys and certificates on board Panama flagged vessels.

2. Background

- 2.1. The increasing technological advances and solutions offered/available for efficient operations and the continued improvement of the procedures and techniques to perform surveys and audits, aiming to optimize the travelling time and expenses.
- 2.2. Human life safety is a key factor for the shipping industry and their exposure to risks is an aspect to consider during surveys; similarly, minimizing disruptions during loading and unloading operations, and their associated risks is one of the commitments of this Administration.

3. Definitions

- 3.1. **Remote Surveys:** is a method of obtaining information equivalent to that obtained from survey on site, by applying digitals and technological systems, in an efficient and secure manner, to carry out survey without surveyor's attendance on board ships.

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3.2. Remote inspection techniques means a method to conduct remote surveys includes the use of remote/tools such as viewing a livestream of audio and video or data stream, or reviewing information and data by means of iPods, video conference/meetings, visual images, photographs, screenshots, trend analysis printouts or using divers, unmanned robot arm, remote operated vehicles (ROV), climbers, drones, or other means acceptable to the Recognized Organizations, however, other means used by Recognized Organizations to conduct remote surveys, should be accepted by the Administration.

4. Application

4.1. Remote Surveys may be used as an alternative to survey on site, employing remote inspection techniques by the crew or ship-designated person, to provide the survey results necessary to the RO appointed surveyor, for the correspondent evaluation, therefore, the survey can be carried out wherever the ship is located and in order to ensure compliance with the applicable international requirements.

5. Approvals of Recognized Organizations to perform Remote Surveys/Audits:

5.1. Every Recognized Organization is responsible to determine if the ship applying for remote survey is eligible for the inspection, considering the scope and suitable conditions to perform such work.

5.2. All Recognized Organizations shall submit their procedures to ro-panama@segumar.com, in order to evaluate the capabilities developed to execute Remote Surveys/Audits. After being approved, the Recognized Organizations will be authorized to carry out the following Surveys-Audits, so far:

1. Interim ISM / ISPS and MLC Audits.
2. Additional ISM/ISPS/MLC due to rectification of non-conformities or pending remarks (Not applicable in cases of Additional Audits due to PSC & ASI detentions).
3. Statutory rectification of deficiencies or remarks (in cases of PSC & ASI detentions it will be evaluated on a case-by-case basis).
4. Occasional In-water Survey
5. Radio Surveys which have been attended by a radio technician subcontracted by the RO as service supplier or an exclusive radio surveyor.

Note: For those cases when a third-party service suppliers or firms approved by the RO, are involved in rectifications of deficiencies, Non-Conformities, remarks, occasional in-water surveys and radio surveys, the RO must keep the corresponding records of such services.



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- 5.3. To broaden the scope of surveys listed on the paragraph 5.2, Recognized Organizations applying for any other statutory certification and services to be conducted remotely, different than the above listed (according to the scope under mandatory IMO instruments), must comply with the requirements of paragraph 6 and submit its procedures to ro-panama@segumar.com, for evaluation.

This Administration reserves its rights to decline any request to broaden the scope of any other statutory certifications based on RO performance and resources.

- 5.4. For all remote surveys/audits above mentioned, the Panama Maritime Authority reserves the right to request that a flag inspector or the personal designated by the General Director of Merchant Marine to participate as a witness.

6. Requirements for approval of Recognized Organizations to perform Remote Surveys/Audits:

- 6.1. Recognized Organizations seeking for the Administration authorization to carry out Remote Surveys/Audits must comply with the following requirements:

6.2. Technologies

- Development and/or Acquisition of software application, for undertaking remote surveys/audits by live streaming, which can be used to provide a live audio-visual connection to a vessel.
- Capability to issue Electronic Certificates (FAL.5/Circ.39/Rev.2 - Guidelines for the use of electronic certificates & MMC-355).

6.3. Security:

- Please refer to the Merchant Marine Circular No. 354 - Guidelines on Maritime Cyber Risk Management.

6.4. Procedures

- Agreement (RO + Company)
- Scope of Survey-Audit
- Planning & Eligibility (RO + Company + Vessel / Previous Testing before Survey-Audit / Procedures during Survey-Audit and after)
- Techniques
- Ship/Company responsible person
- RO responsible person
- Training of Surveyors/Auditors

7. Remote Surveys carried out by the Recognized Organizations shall be monthly reported to this Administration. This information shall be included within the monthly report indicated in the Merchant Marine Circular No.159 - Control of the Issuance of Statutory Certificates.



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8. Certificates and/or endorsement issued after the Remote Surveys has being carried out are subject to the Administrative Fees imposed by the Republic of Panama as it is indicated in the Merchant Marine Circular No. 324.
9. For Remote Surveys/Audits due to COVID-19, please refer to the MMN-07.

February, 2021 – Paragraph 3.2 and 5 were amended; paragraphs 6, 7, 8 and 9 were added.
December, 2020 - Paragraphs 5.2, 5.3 and 5.4 were amended and paragraph 5.5 was replaced.
June, 2020.

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

RO/RSO Control & Monitoring Department
General Directorate of Merchant Marine
Panama Maritime Authority

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