



Merchant Marine **Notice**

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

F-34
(DCCM)
V.04

KEY DETAINABLE DEFICIENCIES FOR PANAMA - FLAGGED VESSELS UNDER BLACK SEA MOU PORT STATE CONTROL (PSC) INSPECTIONS – 2025

No.: MMN-07/2026

1. Purpose:

The purpose of this Merchant Marine Notice is to inform all Shipowners, Operators, Legal Representatives, Masters, Recognized Organizations (ROs), and Shipping Agencies of detainable Port State Control (PSC) deficiencies identified by the Black Sea MoU on Panamanian-flagged vessels arriving at or operating at Black Sea MoU waters in 2025, with the objective of mitigating detention risk, enhancing vessel safety, and maintaining the high-performance standing of the Panama Ship Registry.

2. Applicability:

- 1) All vessels flying the Panamanian flag, regardless of size, type, or trading area, that have undergone PSC inspections or detentions in arriving at or operating within at Black Sea MoU waters.
- 2) Shipowners, Operators, Masters, Legal Representatives, and Port Agents responsible for vessel compliance, navigation safety, and port operations.

3. Detainable Deficiencies Identified under at Black Sea MoU - Port State Control (PSC) – 2025 for Panamanian-Flagged Vessels.

An analysis of 2025 inspections within the Panamanian fleet identifies five key areas where regulatory adherence and operational safety require prioritized attention. Addressing these technical and procedural gaps is essential for ensuring the highest standards of maritime safety.

The following is a summary of the 5 main causes of detention recorded in the Panamanian fleet:

15150	ISM (ISM)
1	ISM external audit must be carried out before departure by Flag/RO.
2	Failure or lack of effectiveness of the implementation of ism code.

11101	Life saving appliances (Lifeboats)
1	Crew not familiar with lifeboat launching procedure crew will be training for lifeboat launching.
2	Free fall lifeboat rudder nozzles with cracks.
3	Lifeboat number no. 1 propeller not working during the inspection.
4	Port side lifeboat engine found inoperative.
5	Port side lifeboat navigational light (top light) inoperative, magnetic compass missing and seats not marked (both lifeboats).
6	Liferaft certificate expired on march 2025.
7	Lifeboat and davit five yearly test certificate missing on board.
8	Lifeboat windows p/s glass crystallized, not transparent, dirty.
9	Life boats p/s retro-reflective tape, seat marking not as required by regulations.
10	Some seats inside life boats obstructed, remote control wire incorrectly installed, need maintenance/greasing of movable parts. grab lines p/s partly detached.
11	Stb side lifeboat case rear fore support temporary repaired.
12	Port and Stb lifeboats placed on main deck due to maintenance. not safe for emergency using.

04109	Emergency Systems (Fire drills)
1	Firemen not familiar with ba set. crew need more training in fire drills. the fire drill as witnessed by psc showed poor command and control and poor preparation.
2	Fire drill failed, not properly mustered, fire area not properly insulated, electrical isolation not performed, BA equipment not checked and not properly used, fire squad incomplete, lack of communication and control.
3	The fire drill was of very poor quality, indicating a lack of knowledge and training among all crew members. most of the basic elements were missing during the drill: breathing apparatus was not appropriately used by the designated fire squad members; boundary cooling was not carried out; the chief officer comes inside of fire area without personal protective equipment; the team showed poor familiarization with the rescue procedure, several crew members wearing lifejacket inside of accommodation during the entire fire drill, and the overall organization was inadequate.
4	During fire drill fire rescue teams intervention not as required crew not familiar

10114	Safety of Navigation (Voyage data recorder (VDR)/Simplified Voyage data recorder(S-VDR))
1	Voyage data recorder alarm no working.
2	Gyro compass/repeater PS water in.
3	VDR has alarm and VDR operation manual missing on board.
4	Gyro repeater show different value with gyro.
5	VDR remote unit lost mic port side wing.

10111	Safety of Navigation (Charts)
1	Chart is cancelled
2	BA charts 2282,3930,1158,1015 for next intended voyage not updated
3	BA2238 chart not used for voyage BA chart 1275 missing on board

4. Fleet Advisory – Compliance Emphasis:

In light of the above findings, this Administration strongly advises all Owners, Operators, and Masters to ensure strict compliance with applicable international conventions, PMA circulars, and industry best practices, with particular attention to the following:

- Merchant Marine Circular No. MMC-404.
Measures adopted to enhance the performance of the Panamanian Merchant Fleet – Pre-arrival checklist for ports under the Port State Control (PSC).
- Merchant Marine Circular No. MMC-384.
Guidelines for appeals process against Port State Control deficiencies/detentions.

Key IMO and International References:

- SOLAS / Chapter I / Reg. 11 – Maintenance of conditions after survey.
- ISM / Part A / 10 – Maintenance of the ship and equipment.
- Resolution A.1206(34) – Procedures for Port State Control, 2025.
- MSC/Circ.1070 – Ship design, construction, repair and maintenance.
- MSC.1/Circ.1253 – Shipboard technical operating and maintenance manuals.



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5. Strategic Focus:

This Merchant Marine Notice highlights the expectations of Port State Control Officers during inspections conducted by the Black Sea MoU underscores the importance of:

- Effective Safety Management System implementation
- Robust onboard maintenance programs
- Proper preparation prior to arrival at Black Sea MoU ports
- Continuous compliance with statutory and operational requirements

The Panama Maritime Authority expects all Panamanian-flagged vessels to ensure full and continuous compliance with these standards. Failure to do so may result in detentions, major deficiencies, operational restrictions, and adverse impacts on the vessel's operational status and the overall performance of the Panama Registry.

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

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