

# Merchant Marine Circular

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

## MERCHANT MARINE CIRCULAR MMC-403

- To:** Shipowners/Operators, Company Security Officers, Legal Representatives of Panamanian Flagged Vessels, Panamanian Merchant Marine Consulates, Recognized Organizations (ROs), and Flag State Inspectors.
- Subject:** Basic Recommendations minimize the Alcohol and drugs use and prevention of Sexually Transmitted Infections and Human Immunodeficiency Virus (HIV).
- Reference:** Maritime Labour Convention, 2006 (MLC), as amended.  
Law No. 2 of January 6, 2009.  
International Medical Guidelines for Ship's; Guidelines for the Control of Drugs and Alcohol in the Maritime Industry; Management of alcohol and drug-related issues in the workplace (ILO). **(As recommendation only).**
- 

### 1. Purpose:

- 1.1. The purpose of this Circular is to provide shipowners and operating companies with basic recommendations to minimize the abuse of alcohol, drugs, and other potentially harmful substances, and prevent the risk and concerns relating to HIV/AIDS and other health risk-related activities on board.

### 2. Scope:

- 2.1. This Merchant Marine Circular applies to all Panamanian Flag vessels engaged in international voyages (international waters).

### 3. Introduction

- 3.1. Drug abuse is a serious hazard to the crew members, other persons on board, and the security of the vessel, for this reason, this Administration must provide guidelines for developing and implementing controls for drugs and alcohol to reduce the possibility of risk of incidents and accidents on board of the Panamanian flag vessels. Both, alcohol- and drug-related problems should be considered health problems, and therefore dealt with, without any discrimination, as any other health problem at work and covered by the health care systems (public or private) as appropriate and practicable. Counseling, treatment, and rehabilitation are important elements in this context.



# Merchant Marine Circular

## 4. General duties and rights of Companies and Seafarers:

### 4.1. General duties and rights of the shipowners and/or operating companies:

- Adopt policies and procedures to prevent drug and alcohol abuse on ships;
- Educate seafarers on the harmful effects and consequences of the unauthorized possession and abuse of drugs and alcohol;
- Provide guidance to seafarers on safe and sensible alcohol consumption;
- Identify at an early stage seafarers who may be abusing drugs or have an alcohol-related problem;
- Eliminate the presence of unauthorized drugs on ships;
- Provide confidential advice, support, and assistance to any seafarer known to have alcohol- or drug-related problems;
- Provide instructions to seafarers and the shore-based employees responsible for the implementation of the alcohol and drug policy;
- Provide information, education, training, and improvement of working conditions, to prevent alcohol- and drug-related problems arising on board; and
- Shipowner and/or operating companies should establish a system to maintain the confidentiality of all information communicated to them concerning alcohol- and drug-related problems.

### 4.2. General duties and rights of Seafarers:

- Respect all regulations applicable to alcohol and drugs on board;
- Cooperate with the shipowner and/or operating company or designated person to prevent accidents at work due to harmful use of alcohol or abuse of drugs;
- Cooperate with the shipowner and/or operating company or designated person on board to maintain safety and health in the workplace and bring to the attention of the employer conditions in the workplace that may encourage, incite, or lead to alcohol- and drug-related problems, and should suggest remedial measures;
- Obtain the necessary assistance for the rehabilitation;
- Seafarers and their representatives should have the right to expect that their right to privacy will be respected and that any intrusion into private life related to alcohol or drug use will be limited, reasonable, and justified;
- Seafarers and their representatives should have access to the advice and services of competent professionals to advise them on the development and implementation of workplace drug policy relating to alcohol and drugs, and to respect the integrity of such professionals, and
- Any other situation described in the SEA or CBA.

# Merchant Marine Circular

## 5. Recommended content of an alcohol and drug policy:

- 5.1. measures to reduce alcohol- and drug-related problems in the workplace through proper personnel management, good employment practices, improved working conditions, appropriate organization of work, and consultation between management and workers and their representatives;
- 5.2. measures to prohibit or restrict the availability of alcohol and drugs in the workplace;
- 5.3. prevention of alcohol- and drug-related problems in the workplace through information, education, training, and any other relevant programs;
- 5.4. identification, assessment, and referral of those who have alcohol- or drug-related problems;
- 5.5. measures relating to intervention, treatment, and rehabilitation of persons with alcohol- or drug-related problems;
- 5.6. rules governing conduct in the workplace relating to alcohol and drugs, the violation of which could result in the invoking of disciplinary procedures up to and including dismissal;
- 5.7. equal opportunities for persons with or who have had alcohol- and drug-related problems, in accordance with the operating company regulations.

## 6. Additional recommendations

- 6.1. The shipowner, operating company a designated person, or those persons otherwise responsible, after consultation with seafarers and their representatives, should consider restricting or prohibiting the possession, consumption, and sale of alcohol on board.
- 6.2. When a ship's medical officer is confronted with a patient under the influence of alcohol or drug, or who has a history of alcohol or drugs use, the main issue is not to judge whether the patient's drinking or drug-taking habits are "right" or "wrong" but rather to determine the extent to what those habits are responsible for the patient's health problems.
- 6.3. If alcohol consumption is permitted on board, the maximum limit of alcohol concentration in the blood will be 0.05% (milligrams per deciliter) or 0.25% (micrograms per deciliter) of alcohol in the breath.



# Merchant Marine Circular

6.4. This Administration recommends taking into consideration the International Medical Guidelines for Ship's Chapter 22, relating to Tobacco, alcohol, and drug use.

## 7. Recommendations on the Human Immunodeficiency Virus (HIV).

7.1. The Human Immunodeficiency Virus (HIV) continues to be a major global public health issue. It weakens the body's natural defenses against disease, leaving an affected person vulnerable to infections and some forms of cancer. The most advanced stage of HIV infection is acquired immunodeficiency syndrome (AIDS).

8. The shipowners or operating companies should ensure that:

- Provide and support health promotion and behavior change programs on HIV and AIDS;
- Eliminate prejudice and discrimination against seafarers living with HIV;
- Provide confidential support to any seafarers known to be living with HIV; Provide up-to-date information, materials and advice on HIV and AIDS to all employees, both sea- and shore-based, through induction programs, and continuing training programs;
- Provide a kit for protection against blood-transmitted diseases in accordance with national specifications for carriage on ships;
- Make condoms available to seafarers on all ships;
- Rapid testing kits for HIV; and
- Maintain confidentiality regarding the status of any seafarer who may be living with HIV.

9. This Administration recommends taking into consideration the International Medical Guidelines for Ships, Chapter 19 regarding HIV/AIDS, and sexually transmitted infections, Chapter 23 on Infectious Diseases, and Chapter 26 on Nursing Care and Medical Procedures.

**April, 2025 – New.**

---

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

SEGUMAR Panama  
Directorate General of Merchant Marine  
Panama Maritime Authority

Phone: (507) 501-5348 / 4241

E-mail: [mlc@segumar.com](mailto:mlc@segumar.com)

Website: [www.panamashipregistry.com/segumar/merchant-marine-circulars/](http://www.panamashipregistry.com/segumar/merchant-marine-circulars/)