

CIRCULAR No. 85***PORTUGUESE MARITIME ADMINISTRATION***

SUBJECT | Enhanced Monitoring and Follow-Up Programme

To | Owners, Operators and Companies of Portuguese-flagged ships, Recognized Organisations, Masters of Portuguese-flagged Ships

DISCLAIMER | This document is for information only and is not intended to interpret or replace the legal referenced documents published by official sources

1. OBJECTIVE

The purpose of this circular is to establish an enhanced monitoring and follow-up programme, in line with the responsibilities of the Portuguese Maritime Administration, addressing potential systematic failures in ships condition, maintenance, and Safety Management System (SMS) implementation, aiming to prevent recurrence of deficiencies, detentions, and to improve ship's overall Port State Control (PSC) performance.

2. IMPLEMENTATION

Particularly after a recurrence PSC detention of a ship an enhanced monitoring and follow-up programme shall be initiated comprising the following, according to the schedule.

2.1. SHIP ISM AUDIT FOLLOWING A PSC DETENTION

Following a recurrence PSC detention of a ship, the Recognized Organisation shall conduct a ship ISM audit with a scope deemed necessary by, and consistent with, the requirements of the Port State Control Authorities for the purpose of lifting the detention. All detainable deficiencies, as well as any other relevant deficiencies identified, shall be addressed and, to the maximum extent practicable, closed during the course of the audit.

This Circular is a controlled document. In case of printing or downloading, it becomes an uncontrolled document. It is Users responsibility to check its up to date status, through DGRM official website at [Circulars](#)



PORTUGUESE MARITIME ADMINISTRATION

2.2. SHIP ISM AUDIT FOLLOW-UP

Approximately three (3) months after the audit which took place subsequently to the PSC detention, but no later than the due date of the existing, if any, Class or Statutory Conditions which resulted from the attendance, the Recognized Organization shall carry out a ship ISM audit follow-up to verify the effective closure of non-conformities and observations.

The applicable scope of the audit shall consist of an Initial audit, exhaustively addressing all the deficiencies registered during the last detention of the vessel.

This audit shall be scheduled in coordination with the Portuguese Maritime Administration and communicated sufficiently in advance to allow the Administration to assess the possibility of assigning a Flag State inspector to attend the audit on board, alongside the Recognized Organization surveyor, if the presence of the same is foreseen relevant by the Administration.

2.3. QUARTERLY INSPECTIONS

The ship shall be subject to quarterly inspections carried out by the Recognized Organisation over a default period of one (1) year.

These inspections shall be carried out in accordance with the scope and depth of an annual inspection and focus in particular on the deficiencies identified as recurrent and which have contributed to the previous detentions, namely, but not limited to:

- maintenance-related issues;
- emergency preparedness and drills; and
- practical implementation of the ISM Code on board.

2.4. MANAGEMENT COMPANY REPORT FOLLOWING A PSC DETENTION

Following a recurrence PSC detention of a ship, the ISM Company shall submit to the Portuguese Maritime Administration a detailed follow-up report, as soon as possible, addressing:

- the root causes of the deficiencies identified during the detentions;
- the corrective and preventive actions taken on board; and
- the measures implemented at company level within the SMS to prevent recurrence.

PORTUGUESE MARITIME ADMINISTRATION

2.5. MANAGEMENT COMPANY ISM AUDIT

Approximately three (3) months after the ship ISM audit which took place subsequently to the PSC detention, the Recognized Organization shall conduct a Management Company ISM audit, the scope of which shall consist of an Initial Audit comprehensively and exhaustively verifying the full implementation of the SMS.

This audit shall be scheduled in coordination with the Portuguese Maritime Administration and communicated sufficiently in advance to allow the Administration to assess the possibility of assigning a Flag State inspector to attend the audit at the company's premisses, alongside the Recognized Organization surveyor, if the presence of the same is foreseen relevant by the Administration.

A number of subsequent management company ISM audits will be considered as deemed necessary during the period over a year.

3. PROGRAMME CLOSURE

The previously established measures are deemed necessary in light of the vessel's detention history and the growing importance attributed to PSC records, particularly their detention data, in the assessment of Flag State performance.

The enhanced monitoring and follow-up programme will be considered successfully completed when:

- All deficiencies, non-conformities and observations from the ship ISM audit and audit follow-up are effectively closed;
- The quarterly inspections are completed without recurrence of critical issues in accordance to flag pre-defined requirements;
- The management company ISM audit demonstrates robust root-cause, corrective and preventive actions implemented within the SMS and onboard; and
- The vessel's standards demonstrate a sustained and measurable improvement.

The Administration reserves the right to extend or intensify the programme should its effectiveness not be adequately demonstrated.



PORTUGUESE MARITIME ADMINISTRATION

4. NON-COMPLIANCE

Failure to comply with programme requirements, established deadlines, or effectiveness criteria, including the recurrence of deficiencies resulting in subsequent detention, may lead the Administration to impose additional measures. Such measures may include, but are not limited to:

- Further Flag State oversight actions;
- Operational restrictions or limitations; and
- Compulsory withdrawal from the registry.

5. OCCASIONAL ISM AUDITS

In special circumstances, irrespective of the matters previously referred to, the Administration may determine the need to conduct an occasional ISM audit of the vessel. Such circumstances may include, but are not limited to:

- Situations arising from the vessel's operation that may pose risks to the safety of the ship, its crew, or the environment; and/or
- Actions, omissions, or events that may conflict with, or potentially affect, the national jurisdiction, international obligations, or regulatory responsibilities of the Portuguese Maritime Administration.

These audits may be ordered independently of the scheduled monitoring programme whenever the Administration deems that additional oversight is required to verify continued compliance with the International Safety Management (ISM) Code and to ensure the effective implementation of safety measures on board.

6. ADMISSION RESTRICTIONS UNDER THE PROGRAMME

Without prejudice to the provisions set out above, and while a vessel and/or its ISM Company are subject to the enhanced monitoring programme established under this Circular, the Administration reserves the right to restrict the admission of additional vessels under the same ISM Company.



PORTUGUESE MARITIME ADMINISTRATION

In this context, the Technical Commission of MAR may, at its discretion, deny the registration of vessels proposed by the concerned ISM Company for the duration of the enhanced monitoring period, which is expected to be no less than one year.

Any exception to this principle must be duly substantiated by the proponent and will be subject to a case-by-case assessment. The TC-MAR reserves the right to accept or refuse such proposals, taking into account the overall performance, risk profile, and compliance history of the ISM Company and its managed fleet.

For the avoidance of doubt, the Administration may refuse the registration of any vessel proposed under these circumstances, even where such vessel would otherwise meet the applicable eligibility criteria for registration in MAR.

Lisbon, 29/09/2026

The General Director of Natural Resources, Safety and Maritime Services



More information

Directorate-General for Natural Resources, Safety and Maritime Services

Avenida Brasília 1449 - 030 Lisboa, Portugal

Tel.: +351 213 035 700

Website Address: <https://www.dgrm.pt/en/>

Email: dsam.secretariado@dgrm.pt

© PORTUGUESE MARITIME ADMINISTRATION COPYRIGHT 2022