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March 30, 2020

Dear Facility Security Officers:

I want to first thank you for your continued efforts to facilitate safe maritime operations during this challenging time. Many of you have already incorporated COVID-19 risk management systems aligned with similar shipboard systems to lower the risk of spreading COVID-19 in our maritime community. Some best practices have included screening visitors, limiting facility access to personnel essential for the safe operation of the facility and vessel, employing social distancing protocols, leveraging technology, and communicating with ship Captains to ensure facility and shipboard procedures are aligned.

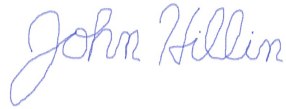
While many of you have already, I request that all of you follow the format of a CG Form 6025 and list the spread of COVID-19 as the threat, and identify the vulnerabilities and mitigating strategies you have employed. My facility staff is ready to assist in facilitating any necessary plan amendments, temporary deviations/measures, noncompliance provisions or waivers; each situation will be handled on a case-by-case basis.

The following are some discussions I have had regarding regulatory compliance issues in a COVID-19 environment:

- 1) Declarations of Security and Inspections still require verbal communication, however an electronic signature is permissible. I ask that you employ a standard and consistent process. I have seen ship and shore email exchanges to confirm review and approval of the applicable declaration as a method used to accomplish an electronic signature.
- 2) A concern that seafarer access requires direct interaction between facility personnel and crew. The authority to restrict crew onboard rests solely with CBP, CG and CDC for medical reasons. The vessel Master does have a reporting requirement for illness and death per policy guidance MSIB 06-20, and if you happen to see any crew showing symptoms described in this MSIB, do not hesitate to contact our command center at (718) 354-4353. Additionally, your MTSA facility seafarer access procedures should not be used to transport symptomatic crewmembers, we will coordinate directly with the vessel to ensure the use of a proper medical transportation service. Immediately contact us if your FSP seafarer access procedures need to be modified.
- 3) The United States has an obligation under MARPOL to remove all unreasonable barriers to ships' ability to properly discharge waste. There are provisions to allow you to continue to receive ships when you are not fully capable of meeting this requirement, however the fact that ships must be able to dispose of their waste in port will be considered while evaluating a waiver request.

Please contact my Facility Compliance Staff at (718) 354-4286 for any assistance.

Sincerely,



J. J. HILLIN
Chief, Safety and Security Operations Division
By direction