

Assistance in meeting MARSEC DIRECTIVE 104-6 (rev 2)

The following information MAY be of assistance in writing or amending a Vessel Security Plan (VSP) to meet the performance standards of MARSEC Directive 104-6.

IMO MSC Circular 623 rev.3 is very detailed and an excellent guide in developing an annex on piracy and armed robbery.

Which vessels does this apply to?

MARSEC Directive 104-6 applies to US flagged vessels operating in high risk areas where acts of piracy and armed robbery against ships are prevalent.

What areas are High Risk Waters?

The areas designated as High Risk Waters are defined in the MARSEC Directive. **(Paragraph 4.c. defines what “High Risk Waters” are and what constitutes being in them for implementation of additional security measures.)** Since they can be expected to change, it is not practical to list the areas designated as high risk in the VSP. This would result in you having to amend the VSP every time the list changes. **Therefore, it is recommended that submitters phrase the statement in their VSP similar to: “When the vessel is operating in high risk waters as designated by Coast Guard MARSEC directive 104-6 and any additional areas determined by the vessel Master or vessel security officer, the following additional security measures will be implemented:”**

I already have an approved VSP that mentions piracy. Do I still need to submit an amendment? Yes. It is recognized that most, if not all, U.S. Flagged vessels which transit High Risk Waters already have a section of their VSP dedicated to piracy. However, Rev (2) of the MARSEC Directive requires the completion and submission of a piracy specific vessel security assessment for each U.S. Flagged vessel that transits High Risk Waters which was not previously required. Additionally, Rev (2) of the MARSEC Directive now requires specific security measures, equipment, and manning be included in the Anti-Piracy plan.

The Anti-Piracy plan and Piracy Specific Vessel Security Assessments must be submitted as a separate appendix to the current VSP.

Several of my ships are similar in design and operation, can I submit a single assessment and Annex to cover all my ships? No. A piracy specific vessel security assessment and Anti-Piracy plan must be completed for each vessel that transits High Risk Waters as identified in the MARSEC Directive.

PIRACY SPECIFIC VESSEL SECURITY ASSESSMENT

Piracy Specific Vessel Security Assessments for each vessel must address the following:

- Identify which High Risk Waters the vessel will transit.
- Review of Freeboard Height and identification of lowest point of access (i.e stern doors)
- Identify options and locations for rigging the vessel with equipment or products that make scaling the vessel difficult.
- Identify full load max speed vessel can maintain.
- Determine if ship's crew needs to be supplemented with professional armed or unarmed security.
 - Are there enough personnel to maintain a vigilant anti-piracy watch and to ensure all ship board anti-piracy precautions are in force?
 - Capability to man the engine room with licensed engineers.
 - Address ability of vessel to berth additional crew or security teams
- Identify access to the Bridge/Wheelhouse and determine necessary modifications of access to these areas.
- Review of the "secure or safe area" location to determine the feasibility, risks, and safety of the designated area.
- Identify all side ports below the main deck that will require reinforcement or covers.
- Identify radar blind spots.
- Identify any additional means of hardening the vessel against intrusions.
- Review equipment on board the vessel to ensure all equipment required by the MARSEC directive is installed.
- Identify non-lethal methods available on the vessel for repelling intruders.

ANTI-PIRACY PLAN

Vessels operating, anchored, or berthed in High Risk Waters must implement the additional security measures identified in the vessel's approved VSP for MARSEC Level 2. (Note: It is not necessary for the vessel to officially change its MARSEC level, but the vessel must implement equivalent security measures as required by the MARSEC Directive.) The piracy annex to the VSP should refer to the additional security measures in the approved VSP that will be implemented or should list additional security measures considered to be equivalent to measures in the approved VSP that are to be implemented onboard the vessel.

What needs to be in this piracy annex?

The annex to the VSP which pertains to piracy and armed robbery against ships should cover each of these sections:

- hardening the vessel against intrusions.
- enhanced surveillance and the use of lighting,
- identify surveillance and detection equipment;
- crew response if a potential attack is detected
- crew response if a potential attack is underway;
- the communication procedures to be used (both internal and external),
- the use of Ship Security Alert System (SSAS);

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- the reports to be made after an attack or attempted attack.

It is understood that some discretion will be left to the Captain and security officer, however, there must be guidelines planned out in advance so that crew members know how to respond. One way of doing this is for the Annex to the VSP to describe how the vessel will address/respond to each phase of an attack: Pre-planning prior to a voyage; Preparation prior to entering high risk waters; Detection of potential attacks; Deterring an attack; and Defending against an attack.

(Answering the following questions may aid in writing a section on piracy and armed robbery.)

Pre-planning prior to a voyage that traverses high risk waters:

- Who is notified about an upcoming voyage that will operate in high risk waters? How far in advance are they notified? Is this far enough in advance for proper preparations to be made? Is it too far in advance where knowledge of the voyage becomes a security risk as crew members may talk too much?
- Is the route and scheduling planned out to try to avoid high risk waters or bottlenecks?
- Does it avoid arriving during evening hours?
- Are there any other transit or general preparations the company and/or vessel make in anticipation of a voyage in high risk waters?
- What, if any, additional personnel training is necessary to carry out the procedures to be implemented in high risk waters? Is the vessel's crew properly trained? Have piracy drills been conducted recently?
- Have areas on the vessel been designated as secure or safe areas? Has the crew been trained in getting to these places? Are there any provisions pre-staged? Any communications?
- Has a crew muster area been established? Has training been conducted with the crew so they know when to muster or what covert words/signals are to be used?

Preparation prior to entering High Risk Waters or Ports:

- Discuss which security measures are to be implemented to reach the equivalent of MARSEC level 2. When will these measures be implemented?
- Discuss any briefings to be held with the crew including procedures to respond to attacks, muster locations, code words, etc.
- What vessel communications will be used while in high risk waters? Internal among the crew? External with shore or naval authorities?
- Will the crew be notified of an attempted or actual attack? If so, by what method?
- At what point in an attack situation will the Ship Security Alert System (SSAS) be activated?
- What vessel preparations, such as locking down the vessel, putting up obstacles to boarding around the vessel, identifying observation points, and identifying equipment to use, need to be done? When will fire hoses be laid out? Are individuals assigned to do certain functions or are the functions assigned on the spot? (Is everyone in the crew cross-trained to do all of the functions?)

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- What if any equipment or systems need to be tested before entering high risk waters? Will search lights be tested? Alarms? Radios?
- Are the phone numbers/radio frequencies posted on the bridge/gangway for the local RCCs when approaching high risk waters?

Detection of potential attacks:

- What types of steps are to be taken to maintain vigilance and ensure early detection of an attack?
- How will installed radars be used? Are there specific ranges/scales they should be set to?
- Are there radar blind spots? If so, how will those blind spots be monitored?
- Are there any additional watch keeping responsibilities, security responsibilities, personnel assignments to augment the regular watches? Are the assignments posted or available for all crewmembers to see in advance?
- What if any lighting will be used?

Deterring an attack:

- Should the crew attempt to deter an attack? If so, by what means?
- How will the vessel respond? (Evasive maneuvers, sound ship's alarm, radio alarms, activate SSAS, increase lighting, etc.?)
- Will the ship make any specific radio communications? To whom?
- Will the vessel attempt to let the attackers know they have been spotted?

Defending against an attack:

- Should the crew attempt to defend against an attack? If there will be no defense, state what the crew is to do.
- What is the crew's response when an attack is in progress?
- How will the vessel be defended?
- If a defense will be mounted, at what point will the crew stop actively fending off the attackers? What should the crew do next? Surrender? Barricade themselves in a designated area?
- At what point does the crew give in to their attackers completely? What should the crew be doing at this point?

Record Keeping:

- The VSP should address record keeping and logging procedures when operating in high risk waters. (For actual and attempted incidents.)
- Which additional security measures are logged?
- What reports are to be sent to NRC for piracy?
- What reports are to be sent to RCC for the SSAS activation?
- How do the reporting procedures in IMO MSC Circular 623 rev.3 and Title 33 CFR 101.305 apply to this vessel?
- Will lessons learned from actual or attempted incidents be documented? Will a post-incident debrief /hot wash be conducted?

While Anchored or in Port in High Risk Waters:

- What if any briefings will be held with crew members to discuss “behavior” when ashore?
 - Will you discuss how and why cargo information and voyage routes are protected from disclosure?
- Is the arrival time coordinated to coincide with daylight hours?
- What if any additional security measures will be taken while in port in addition to those mentioned previously? (All deck lighting illuminated.)
- Discuss procedures for leaving port, such as:
 - Prior to leaving port will the vessel be thoroughly searched? Is there written guidance on the vessel on how to conduct a thorough search?
 - Which doors and access points will be secured and/or controlled prior to departure? How will they be secured?