

U.S. Department
of Transportation

United States
Coast Guard



Captain of the Port
U. S. Coast Guard Marine Safety Office
Houston-Galveston

P. O. Box 446
Galena Park, TX 77547-0446
Phone: (713) 671-5100
FAX: (713) 671-5185

16610
February 19, 2003

Dear Port Community Member,

Subj: RECOMMENDED SECURITY GUARD GUIDELINES

The maritime industry has expressed growing concern with the inconsistency of armed security guard requirements and lack of adequate guidelines. The Houston-Galveston Navigation Safety Advisory Committee's (HOGANSAC) Port Security Subcommittee recognized the concern and created the Security Guard Working Group to assess this concern and make recommendations to the subcommittee, the Coast Guard, and Immigration and Naturalization Service (INS). The working group included representatives from Coast Guard, INS, Customs Service, as well as, the vessel owners/operators, facility owners/operators, vessel agents, and security firms.

The Security Guard Working Group's recommendations were accepted by the subcommittee, and subsequently endorsed by the Coast Guard Captain of the Port and the INS District Director. A copy of the recommended guidelines is enclosed for your use. Please feel free to disseminate this document widely.

I congratulate the Security Guard Working Group and the HOGANSAC Port Security Subcommittee in producing a document which will promote consistency, safety, and security within the ports of Houston, Galveston, Texas City, and Freeport. Publication of these guidelines represents another milestone in government-industry cooperation.

If you have any questions concerning the recommended guidelines, please contact my Chief of Waterfront Facility and Security, Lieutenant Kerry Karwan at 713-671-5105.

Sincerely,

Kevin S. Cook
Captain, U.S. Coast Guard
Captain of the Port

Encl: (1) Recommended Security Guard Guidelines COTP Houston-Galveston



**U. S. Coast Guard, Captain of the Port of Houston-Galveston
and U. S. Immigration and Naturalization Service Houston, Texas
Recommended Operating Procedures for Implementing and Enforcing
Security Measures for High-Risk Crewmembers on Vessels
Arriving/Operating within the jurisdiction of the COTP Zone.**

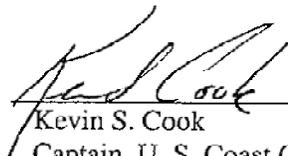
Provisions: The recommended operating procedures contained herein are neither intended to conflict with current law or regulation; nor is this agreement intended to conflict with the directives of the Department of Transportation, Department of Justice, Department of Homeland Security, U. S. Coast Guard or U. S. Immigration and Naturalization Service.

Effective Date: The terms of these recommended operating procedures are effective upon signature by all parties.

Modification: These recommended operating procedures may be modified by written, signed consent of all parties or by higher authorities in the Department of Transportation, Department of Justice, Department of Homeland Security, U. S. Coast Guard or U. S. Immigration and Naturalization Service. *A review of the procedures will be conducted 90 days after their implementation to ensure accuracy and accord with Federal, State, and Local Laws, as well as any regulations or rules that may govern.*

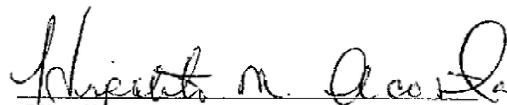
Termination: The recommended operating procedures will remain in effect indefinitely until it is terminated by written, signed order of all parties. Higher authorities in the Department of Transportation, Department of Justice, Department of Homeland Security, U. S. Coast Guard or U. S. Immigration and Naturalization Service may also terminate this agreement.

Date: 10 Feb 2003



Kevin S. Cook
Captain, U. S. Coast Guard
Captain of the Port
Houston, Texas

Date: Feb. 10, 2003



Hipolito M. Acosta
District Director, U. S. I. N. S.
Houston, Texas



U.S. IMMIGRATION
& NATURALIZATION SERVICE (INS)



USCG CAPTAIN OF THE PORT
HOUSTON-GALVESTON

**RECOMMENDED GUIDELINES & OPERATING
PROCEDURES FOR INS REQUIRED ARMED
SECURITY ABOARD VESSELS DOCKED WITHIN
THE JURISDICTION OF THE COTP ZONE**



RECOMMENDED MINIMUM STANDARDS
&
OPERATING PROCEDURES
FOR
CONTRACT SECURITY GUARD SERVICES

Recommended Minimum Standards for Contracted Security Services

Contracted security services must meet or exceed the following standards to demonstrate adequacy to perform the assigned task:

Vessel Responsibilities:

1. The vessel will provide security services in accordance with a COTP Order and in conjunction with INS requirements. These services shall be provided in accordance with the statutes of the State of Texas.
2. Security services must be contracted before the vessel is given permission to enter the port.
3. Security services shall be at the pier, dock, or wharf before the vessel is moored. If not, the gangway will not be deployed until the armed guards have arrived at the dock and are in position to begin providing their services.
4. Immediately upon deploying the gangway, a safety briefing (including the completion of the attached checklist) shall be held between the vessel, facility, and security services.
5. Contracted security assigned to provide services on behalf of vessels on which INS has detained crewmembers shall be capable of communicating through the Vessel Master with the Facility (or Facility Security), Police, Security Dispatcher, INS, U.S.C.G., and the Vessel Agent.
6. The vessel must provide security services with a copy of the entire crew list, with the names of those crewmembers that are not authorized to go ashore highlighted. The vessel must also provide a photograph (or copy) of any crewmember not authorized to go ashore. In order to go ashore, the crewmember/passenger must present INS form I-94 or I-95 and a photo ID (or copy) to the security service.
7. Security services must be provided with access to restrooms, as well as sufficient shelter to protect against severe weather conditions such as high heat, and extreme cold. The shelter should be in the vicinity of the gangway, but should not be so obstructed as to prevent the security services from safely performing their assigned duties.
8. A security guard and the Master will coordinate muster of the detained individuals twice a day (irregular time) to verify their identity by passport, seaman's book, or photo taken at the time of first muster with the name of the individual written on the photo.
9. The master/agent should contact INS each day for approval to release security services.

Security Services Responsibilities:

1. Contracted security services must train security guards on the guidelines contained in this document and their company procedures. If any questions arise, the security guard should contact their own office.
2. Guards will have their current commission card on their person at all times when on duty. Peace Officers will have their current T.C.L.E.O.S.E. card and/or agency identification card with them when on duty. All personnel working security aboard vessels will identify themselves by full name and present their credentials when asked. Guards or Officers shall wear clothing clearly marked and easily identifiable as a security guard or Peace Officer. Only handguns are required for this function on board a vessel. Contracted security services working under a Captain of the Port Order and on order of the Immigration and Naturalization Service shall be armed with a sidearm (pistol) while on

Security Services Responsibilities continued:

duty, as directed by U. S. Immigration and Naturalization Service. This side arm will be of an equivalent to law enforcement standard issue. The handgun should remain holstered at all times unless a situation is encountered where Texas State law authorizes the use of deadly force.

3. Guards should thoroughly understand that they are present as a deterrent only and shall inform the proper authorities of any problems. It is the duty of every Peace Officer to preserve the peace within the officer's jurisdiction. Peace Officers are also authorized to make arrests outside of their jurisdiction when they witness a felony criminal act. Commissioned security guards have the same authority as a citizen in that they may make a citizen's arrest if they witness the commission of a felony criminal act.
4. Guards shall have basic Hazardous Waste Operations and Emergency Response (HAZWOPER) "Awareness Level" training and comply with other state and federal safety and health requirements.
5. Guards shall consult with the facility in advance to insure that they have any necessary, special, or safety equipment required by the facility upon arrival for duty.
6. Security services shall arrive at the facility at least 1 hour prior to arrival of the vessel in order to complete any required safety indoctrination and allow for sufficient time to be escorted to the dock facilities.
7. Security guards shall be briefed prior to going on duty and have procedures and contact numbers readily available. Guards should have communication with each other as allowed by the vessel and facility. For example, if the terminal has a 24-hour operations center, radio communications may be appropriate. If there is no 24-hour operations center within radio communications, access to a cellular telephone, or if not permitted, a telephone will be required.
8. Security services shall be provided with periodic breaks for restroom breaks and meals at intervals not to exceed four hours, and no guard may work for more than 16 hours in a 24-hour period. Guards should exchange positions with each other every two hours, or as specified by the security service provider. The security service is responsible for providing food, water, inclement-weather gear, shade providing devices, etc.
9. A minimum of two (2) guards will be required. One guard will be stationed in the vicinity of the gangway to control access/egress from the vessel. It is suggested that the gangway watch be located on the wharf, and the other guard located in a position to allow monitoring of mooring lines and other areas of the vessel. The guards should remain within sight of each other as much as possible. The USCG and/or the INS must review any alternative to this manning arrangement.
10. Security services are to ensure that only those crewmembers authorized to disembark are allowed to do so. The security services must verify the identity of any crewmember requesting to come ashore, check the crewmember's stated name against that found on the identity document provided (I-94 or I-95 forms), and check the crewmember's physical appearance against those descriptors found in the document presented and against the photograph provided by the vessel.
11. Security services shall maintain a log of all persons coming aboard and going ashore (see attached form).
12. Non-crew, with proper identification, may board and leave the vessel. This may include vendors and service providers contracted to the ship (i.e., stevedores, agents, etc.). Anyone boarding or leaving the vessel may be searched at the Masters' discretion.

Security Services Responsibilities continued:

13. If a detained individual attempts to, or successfully departs the vessel, the security guard will immediately report the incident per the communications plan listed on the checklist.
14. In the event that a detained individual requires emergency medical attention, one guard will accompany the individual to the hospital in the ambulance while the other guard remains on duty at the vessel. The vessel agent shall arrange for an additional guard. Additionally, the vessel agent shall notify the INS and USCG.

Facility Responsibilities:

1. The gangway may not be deployed until the security guards have arrived at the dock and are in position to begin providing their services.
2. The Facility Supervisor must approve all communication equipment used by security personnel prior to commencing security operation.
3. The facility will participate in a safety briefing (including the completion of the attached checklist) between the vessel, facility, and security services. A separate checklist can be used to insure all safety items for the facility are reviewed (see attached example).

ALTERNATIVE PROCEDURES

Due to the dynamic nature of the maritime industry, we understand that the recommended guidelines and operating procedures for armed security guards aboard vessels may not provide the flexibility needed to meet the operational demands of vessel. Therefore, in order to allow for special unforeseen circumstances or operational constraints, the USCG and INS will review alternate procedures in lieu of armed guards on a case by case basis. In order to initiate a request for alternate compliance, the vessel's designated representative must contact our office with a comprehensive crew control security plan that provides an equivalent level of safety and security as armed security guards. Requests for alternative procedures should be developed using the principles and procedures included in the Guidelines and Operating Procedures above. Examples of accepted alternate crew control security plans will be posted at the US Coast Guard Marine Safety Office Houston-Galveston's internet website: www.uscg.mil/d8/mso/hougal

List of Attachments:

1. Sample COTP Order
2. Pre-job Checklist (Complete with vessel and guard)
3. Facility Indoctrination Checklist
4. Security Service Log



Date: _____

FROM: COGARD MSO HOUSTON GALVESTON TX
TO: CCGDEIGHT NEW ORLEANS LA
CC: (Affected Facility or Facilities)
BT
UNCLASSIFIED //N16600//
SUBJECT: CAPTAIN OF THE PORT ORDER 0X-XXX
TO: MASTER M/V SECURE SAILOR, L1234567, BF
C/O STRAIGHT-SHOOTER SHIPPING AGENCY
10050 N.W. FREEWAY, SUITE 140
HOUSTON, TX 77092
PHONE: 713-305-7504
FAX: 713-683-3595

AS CAPTAIN OF THE PORT, UNDER TITLE 50 UNITED STATES CODE SECTION 191 AND TITLE 33 UNITED STATES CODE OF FEDERAL REGULATIONS, PART 6., I HEREBY DIRECT YOU TO REMAIN AT LEAST THREE NAUTICAL MILES OFFSHORE PRIOR TO YOUR ARRIVAL IN THE HOUSTON-GALVESTON COTP ZONE UNTIL YOU SUBMIT A CREW CONTROL SECURITY PLAN (CCSP) WHICH IS APPROVED BY THE UNITED STATES IMMIGRATION AND NATURALIZATION SERVICE (INS) AND THE UNITED STATES COAST GUARD (USCG)

THE CREWMEMBER SECURITY PLAN MUST DOCUMENT THE PROCEDURES THAT WILL BE USED TO ENSURE ANY DETAINED CREWMEMBERS REMAIN ON BOARD DURING THE VESSEL'S PORT CALL. THE PLAN MUST BE SUBMITTED TO INS AT FAX NUMBER (713) 675-7877 AND PHONE (713) 675-7982 FOR PRELIMINARY APPROVAL AND MUST DOCUMENT THE SECURITY MEASURES THAT WILL BE PUT IN PLACE TO ENSURE THAT THE IDENTIFIED PERSONNEL REMAIN ONBOARD THE VESSEL THROUGHOUT ITS PORT CALL. ONCE THE INS AND USCG (AT FAX NUMBER (409) 766-4702 AND PHONE (409) 766-5608) HAVE APPROVED THE SECURITY PLAN, YOUR VESSEL WILL BE PERMITTED TO PROCEED TO ITS BERTH. SUGGESTED GUIDELINES FOR SECURITY GUARDS HAVE PREVIOUSLY BEEN FORWARDED TO YOUR AGENT UNDER SEPARATE COVER.

TITLE 50, UNITED STATES CODE, SECTION 192 PROVIDES THAT, IF ANY OWNER, AGENT, MASTER, OFFICER, OR ANY PERSON IN CHARGE, OR ANY MEMBER OF THE CREW OF ANY SUCH VESSEL FAILS TO COMPLY WITH ANY REGULATION OR RULE ISSUED, OR ORDER GIVEN UNDER THE PROVISIONS OF THIS TITLE, OR OBSTRUCTS OR INTERFERES WITH THE EXERCISE OF ANY POWER CONFERRED BY THIS TITLE, THE VESSEL, TOGETHER WITH HER TACKLE, APPAREL, FURNITURE, AND EQUIPMENT, SHALL BE SUBJECT TO SEIZURE AND FORFEITURE TO THE UNITED STATES IN THE SAME MANNER AS MERCHANDISE IS FORFEITED FOR VIOLATION OF THE CUSTOMS REVENUE LAWS; AND THE PERSON GUILTY OF SUCH FAILURE SHALL BE PUNISHED BY IMPRISONMENT FOR NOT MORE THAN 10 YEARS AND MAY, AT THE DISCRETION OF THE COURT, BE FINED NOT MORE THAN \$10,000.00. FOR ADDITIONAL INFORMATION CONCERNING THIS ORDER, CONTACT THE CAPTAIN OF THE PORT DUTY OFFICER AT (409) 766-5608.

SIGNED _____
CAPTAIN, U.S. COAST GUARD
CAPTAIN OF THE PORT HOUSTON-GALVESTON TEXAS
BT NNNN



Security Services Pre-Job Checklist

*** Refer to the Minimum Standards for detailed explanation of checklist items ***

Vessel	Guard	Item
		1. Safety brief has been conducted between vessel and security guards. Briefing includes cargo on board and on facility, where to shelter in case of an emergency, emergency signals, how to request emergency services, location of bathrooms, potentially hazardous areas onboard, excluded areas, any transiting on ship safety hazards, etc.
N/A		2. Vessel's agent has confirmed that the security guard has his current T.C.L.E.O.S.E. card and/or agency identification card on his person.
N/A		3. Guards confirm that they have been trained to a minimum of First Responder Awareness Level training in accordance w/OSHA regulation 29 CFR 1910.120 (q)(6)(i) and comply with other state and federal safety and health requirements.
		4. Guards have a copy of the Guidelines and Operating Procedures (or company procedures) available and understand their responsibilities and authority to act under the Guidelines.
		5. Guards have been provided with a list and photo identifying any detained crewmembers/passengers not allowed to go ashore, as well as a photo (or copy).
		6. A communications plan has been established. A list of contact numbers for the guards to utilize (circle method to use, add phone numbers where applicable):

Master	Radio or verbal
Facility or facility security	Radio, verbal, or phone (if permitted) Phone
Police	Phone, or through Master or facility Phone
Ship's agent	Phone, or through Master Phone
USCG Houston-Galveston	Phone, or through Master, Agent or facility Phone +1-713-671-5000, extension "5100"
INS, Houston	Phone, or through Master, Agent or facility Phone +1-888-552-2429
Contract security dispatcher	Phone, or through Master, Agent, or facility Phone #

		7. Security guards will work with the Master of the vessel to conduct periodic musters of the detained individuals.
		8. Checklist items will be reviewed between all parties at shift change.
N/A		9. Lead guard will review relevant information with all other guards on shift, and have subsequent guards pass on information at each shift change.
		10. At each shift change, new workers (vessel, guards, or facility) coming on duty will initiate dialog with other representatives to review status of operations taking place.



**FACILITY NAME/LOCATION
SAFETY INDOCTRINATION FOR SECURITY GUARDS**

Dock:

Vessel:

Date:

Facility Rep. <i>(initial)</i>	Guard <i>(initial)</i>	Guard <i>(initial)</i>	Topic Covered
			<p>1. Safety Brief. Details: Discuss potentially hazardous areas and related safety issues. Describe emergency signals, sheltering, and evacuation procedures..</p>
			<p>2. Safety equipment requirements. Details: On tanker vessels, it is recommended that the guard onboard the vessel remain clear of the manifold area. When located in the area of the manifold, as well as other certain areas onboard, additional protective equipment is required. Minimum requirements are a hard hat and monogoggles, although additional equipment might be required depending upon the cargo being transferred. Guards should also maintain vigilance, and stay clear of moving vehicles (on Ro-Ro vessels), as well as overhead lifts and moving cranes (on all vessels, and in particular container vessels). Facility personnel will monitor to insure these requirements are complied with. Most areas of the dock will require that the guard wear a hard hat and eye protection (safety glasses or monogoggles, depending on the location). When possible, areas will be designated where the guard is not required to wear additional protective equipment.</p>
			<p>3. Key contacts for armed security guards while at the facility. Details: (Give phone numbers and locations where they can reach facility personnel who they can call on if needed.)</p>
			<p>4. Facility requirements for the vessel and vessel personnel when armed guards are required. Details: (Explain any special requirements the facility has.)</p>
			<p>5. Compliance with safety requirements. Details:</p>
			<p>6. Location of officers. Details: Immigration has normally required that one guard be stationed near the gangway onboard the vessel, and another near the gangway on the dock. If allowed by Immigration, guards may periodically enter the accommodations on the vessel or the dockshack on the dock to take care of necessary functions (use the phone, get a drink, etc.). Guards are not allowed to roam about the facility or shoreline, unless required by Immigration. In these cases, the facility must receive a copy of the instructions provided by Immigration.</p>
			<p>7. Communications equipment. Details: Only communications equipment authorized by the facility shall be used. In particular, cellular phones and other non-intrinsically safe devices may not be used on the dock, nor onboard the deck of the vessel. These devices may be used in the dockshack. Consult vessel personnel for approved locations onboard the vessel.</p>
			<p>8. Smoking. Details: Smoking is not allowed on the facility, nor on the deck of any vessel. The vessel may have designated smoking areas identified within the accommodations. Consult personnel on the vessel to determine where and if smoking is allowed onboard.</p>
			<p>9. Entering or leaving the site Details: (cover site-specific issues, such as escort requirements, notification requirements, etc.)</p>

Facility

Security Guard

Security Guard

Signature: _____

Print: _____

(Provide a photocopy of this signed document and the letter to the agents to the Security Guards for their reference)

