



Homeland
Security

U.S. COAST GUARD



Guidance for Creating/Improving a Vessel Security Plan (VSP)

(03/23/2004)

Purpose: The purpose of this document is to provide a general description of the steps necessary to create a VSP or to improve upon an existing VSP. It is *not* a “fill in the blanks” *template* and it is *not* intended to be inclusive of every vessel type or operation.

Most of the below information can be found on the Internet web site for the Office of Port Security at the following link: <http://www.uscg.mil/hq/g-m/mp/mtsa.shtml>. This web site contains a wealth of useful information. VSPs and MARSEC Directives are considered sensitive security information. MARSEC Directives can be obtained from your local Coast Guard Captain of the Port (COTP). To locate your local COTP, you may use the following link: <http://www.uscg.mil/vrp/maps/msomap.shtml>.

What do I need before I start?

- 1. *Interim and Final Rules (IFR & FR)*** - The IFR and FR were published on 1 July 2003 and 22 October 2003, respectively in the *Federal Register*. The preamble of each of these versions of the regulations contains a very important discussion (not found in the body of the regulatory text) concerning the background, purpose and intent of the regulations. Therefore, it is prudent to read the preamble and maintain a copy for future reference to assist in interpreting the various regulatory cites.
- 2. *Copy of the regulations*** – The consolidated text of 33 CFR Parts 101 and 104 are the applicable regulations for vessels.
- 3. *Navigation and Vessel Inspection Circular (NVIC)*** - NVIC 04-03 provides guidance on implementing the security regulations mandated by the *Maritime Transportation Security Act of 2002 (MTSA)*. Enclosure (1) of this NVIC contains a checklist similar to the one used by Marine Safety Center (MSC) to measure compliance with the requirements for an approved VSP.
- 4. *Policy Advisory Council (PAC) Frequently Asked Questions (as applicable)*** – PAC FAQs document Coast Guard policy relating to maritime security.
- 5. *MARSEC Directives (as applicable)*** – Issued by the Commandant of the Coast Guard, and used to provide vessels and facilities nationwide with objective performance standards regarding access control, and the secure handling of cargo. *MARSEC Directives* do not impose new requirements, but provide direction to the industry on how to meet the performance standards already required by the regulations. Examples of the type of information provided include the specific frequency and/or detail that vessels and facilities must screen persons, baggage, personal effects, and vehicles for dangerous substances and devices.
- 6. *TSA Vulnerability Self-assessment Tool (optional)*** - 33 CFR 101.510(a) refers to a valuable vulnerability self-assessment tool developed by the Transportation Security Administration called the TSA Maritime Self-Assessment Risk Module (TMSARM). *This tool may be accessed via: http://www.tsa.gov/public/interapp/editorial/editorial_0826.xml.*

Now that I have everything that I need, what do I do with it?

- 1. Read the regulations and policy cited above** – Most of this information has been available to the public since late 2003. Reading it is critical to becoming familiar with all of the regulatory background, requirements and policy regarding VSP preparation.
- 2. Determine which MARSEC Directives are applicable to your vessel** – MARSEC Directives may be applicable to specific types of facilities or vessels. They may also apply generally to all vessels. Consult with your local COTP to determine which directives are applicable to your vessel/operation.
- 3. Conduct a Vessel Security Assessment (VSA)** – The vessel security assessment is a written document that is based upon both background information and the completion and analysis of an on-scene survey. The general and specific requirements for conducting a VSA are contained in 33 CFR Parts 104.300 and 104.305. This assessment is used in developing your plan. (*Tip: Use the TSA vulnerability self-assessment tool to help you complete this step.*)
- 4. Prepare a Vessel Security Assessment Report** – The VSA report is required to be included as part of the VSP. The requirements for the VSA report can be found in 33 CFR 104.305(d).
- 5. Use the proper format for your VSP** – The required format of the VSP is contained in 33 CFR 104.405. This section of the regulations identifies the 17 required sections of a VSP. If the VSP does not follow the order in the list, you must ensure that the VSP contains an *index* identifying the location of *each* of the required sections.
- 6. Use the “Job aid for measuring compliance” found in NVIC 04-03** – To make sure you don’t leave out any regulatory requirements in your VSP, use the *Job aid for measuring compliance*. It is simply a detailed checklist and is Table 1-1 of enclosure (1) to NVIC 04-03. It parallels the regulations in 33 CFR 104. If you address each and every item in this checklist, you will be off to a great start in the CG approval process since the MSC will be using a very similar checklist to evaluate your plan. (*Tip: Review your VSP submission against the NVIC checklist as a crosscheck on your work. If you believe that a certain item or entire section in the job aid is not applicable to your vessel(s), note that fact in your VSP. This can save you unnecessary rework of your plan as the Coast Guard will now know that you considered each item, as applicable, to your vessel. If you include a copy of your completed job aid, it may help the Coast Guard to review your plan. Remember, however, that every vulnerability identified in your VSA report must be addressed by positive security measures described in your VSP.*)
- 7. Submit completed VSP to MSC for Coast Guard review** – Vessel owners/operators must submit their VSP to the MSC for review and approval. The address for MSC is:

Commanding Officer
USCG Marine Safety Center
Nassif Building, Room 6302
400 Seventh Street, S.W.
Washington, DC 20590
(202) 366-3879

(Tip: The use of a commercial courier service may help the submitter obtain timely delivery and documentation.)

“Your effort to complete and effectively implement a Vessel Security Plan is a tremendous contribution to our Maritime Homeland Security.”

*Captain Roy A. Nash
Commanding Officer, USCG Marine Safety Center*