

United States Coast Guard



**DOMESTIC VESSEL SECURITY PLAN
VERIFICATION GUIDE FOR MTSA/ISPS CODE**

Name of Vessel	Vessel Type								
Documentation Number	Case Number								
Date Completed									
Location									
<p>Senior Marine Inspectors / Boarding Officers</p> <table> <tr> <td>1. _____</td> <td>5. _____</td> </tr> <tr> <td>2. _____</td> <td>6. _____</td> </tr> <tr> <td>3. _____</td> <td>7. _____</td> </tr> <tr> <td>4. _____</td> <td>8. _____</td> </tr> </table>		1. _____	5. _____	2. _____	6. _____	3. _____	7. _____	4. _____	8. _____
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Use of Domestic Vessel Security Plan Verification Guide for MTSA/ISPS Code.

This guide is designed to assist the Coast Guard Inspector in conducting a field verification of the vessel security plan of a U.S. Flagged vessel¹. This booklet is divided into three sections. Section (A) contains spaces for the vessel particulars that are needed to complete an activity in MISLE for vessels on an international voyage. Section (B) is a guide to the parts of the regulations or Code and is designed to be used as a checklist when verifying the VSP. The inspector should complete the checklist by consulting the VSP for specific security measures. Section (C) is designed to provide additional information to the inspector. This section may be discarded as the inspector gains experience conducting verification exams. A bi-fold booklet is also provided on the G-MP MTSA/ISPS information website at <http://cgweb.comdt.uscg.mil/G-Mp/index.html>.

There are three key steps that the Coast Guard inspector must follow in conducting a verification:

- Ensure the vessel complies with the Vessel Security Plan (VSP).
- Ensure the adequacy of the vessel security assessment (VSA).
- Ensure that the measures in place adequately address the vulnerabilities.

MTSA regulations do not mandate specific equipment or procedures, but call for performance based criteria to ensure the security of the vessel. While this guide is designed to assist the Coast Guard inspector, this guide cannot be used alone to verify the vessel has adequate security measures. The review of the VSP and the VSA require interaction with company and/or vessel when conducting a verification aboard the vessel.

Some domestic vessels that sail on international routes will also be required to meet the International Ship & Port Facility Security (ISPS) Code. The Coast Guard as the representative of the Contracting Government² must verify that the vessel fully complies with the ISPS Code prior to issuing the International Ship Security Certificate (ISSC). The Maritime Transportation Security Act (MTSA) and the corresponding regulations also require compliance for a vessel to operate, but do not require a certificate to be issued. However, MTSA³ like ISPS requires the Coast Guard to verify that that vessel is in compliance with an approved security plan. Because MTSA encompasses the requirements of ISPS, compliance with MTSA satisfies ISPS requirements except as noted for U.S. flag vessels on an international route

MTSA and ISPS place the responsibility to complete an accurate security assessment, and to address the vulnerabilities in the Vessel Security Plan (VSP), or Ship Security Plan (SSP)⁴ on the owner or operator of a vessel. The Coast Guard has the responsibility to verify that the vessel is complying with its approved plan.

Pre-inspection Items

- Review MISLE records
- Deficiency History
- Critical Profile
- CG Activity History

Inspection Items

- Review VSP
- Review VSA Report
- Conducted verification with exam booklet and VSP

Post-inspection Items

- Issue/endorse certificates to vessel
- MISLE activity case

¹ This guide may also be used for the small number of foreign flagged vessels, such as non-SOLAS foreign vessels subject to MTSA.

² The term "Contracting Government" used in the ISPS Code means the Flag State, and for the purposes of this circular means the Coast Guard on behalf of the United States..

³ For the purposes of this circular, the term MTSA means the MTSA regulations and the term ISPS means the ISPS Code unless otherwise noted.

⁴ For the purposes of this circular, unless otherwise noted when the requirements for the Vessel Security Plan (VSP) or Vessel Security Assessment (VSA) are discussed, it includes the similar requirements for the Ship Security Plan (SSP) or Ship Security Assessment (SSA), respectively, which are required by the ISPS Code.

This section is only required for U.S. Flag vessels on an international voyage.

Certificates / Reports (complete at each security exam and update MISLE Certificate data)

Name of Certificate	Issuing Agency	ID #	Issue Date	Expiration Date	Endorsement Date	Official Seal (Y/N)	Remarks
International Ship Security Certificate							
Interim International Ship Security Certificate (if issued)							

Equipment Data

Equipment Type	Description	Approval Information	Authority/Agency
AIS Communications			
Ship Security Alert System			

Continuous Synopsis Record (Review Record and Enter Most Current Data)

Flag State	Date Registered	Ship ID #	Ship Name
Port of Registry	Registered Owners		Company (1)
Issuer -ISM Doc. Of Compliance	Issuer – ISM Safety Management Cert.	Issuer – ISM Safety Management Cert.	Issuer - ISPS International Ship Security Certificate

(1) as defined in SOLAS Chapter IX

Security Personnel (Compare to Current MISLE Data)

CSO Name:	VSO Name:
CSO Contact Number:	VSO Contact Number:
CSO Address:	VSO Address:

Section A
Certificates/Equipment
Data/Records Information

Section B
U.S. Flag Vessel MTSA/ISPS Code Exam Booklet
Security Practices and Crew Competencies

Examinations shall address all areas of the MTSA regulations and certain ISPS requirements as appropriate, and shall be done through: observation that security procedures are in place; questioning crewmembers regarding security duties and security procedures; verifying on board presence and validity of required security documents and certificates; and proper operation of security equipment. This booklet includes several job aids to assist with these processes. This booklet is intended to be used as a guide to general MTSA requirements, and specific requirements will be contained in the VSP.

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|--|---|
| <ul style="list-style-type: none"> <input type="checkbox"/> Compliance documentation • Approved Vessel Security Plan <ul style="list-style-type: none"> ○ Review the VSP ○ Review the Vessel Security Assessment • Letter from MSC stating under review • Alternative Security Plan, with letter signed by vessel owner/operator. <ul style="list-style-type: none"> ○ Review ASP and vessel assessment - ASP used:
 _____ | <p>33 CFR 104.120
ISPS, Part A, 9.1</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Noncompliance • Conditions in place (if any) • Conditions met <input type="checkbox"/> Waivers. • Waiver approval letter from G-MP <input type="checkbox"/> Equivalentents • Approved by G-MP <input type="checkbox"/> Alternative Security Programs. • Updated • Plan on board manned vessels? <input type="checkbox"/> Maritime Security (MARSEC) Directive. • Proper safeguards • Incorporated in to security plan <input type="checkbox"/> Master. • Aware of responsibility and authority with regards to MTSA <input type="checkbox"/> Company Security Officer (CSO) • Training /Experience • See list of sample questions <input type="checkbox"/> Vessel Security Officer (VSO) • See list of sample questions • Training and experience | <p>33 CFR 104.125</p> <p>33 CFR 104.130</p> <p>33 CFR 104.135</p> <p>33 CFR 104.140</p> <p>33 CFR 104.145</p> <p>33 CFR 104.205</p> <p>33 CFR 104.210
ISPS, Part A, 11.1</p> <p>33 CFR 104.215
ISPS, Part A, 12.1</p> |

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|---|---|
| <ul style="list-style-type: none"> <input type="checkbox"/> Company or vessel personnel with security duties • See list of sample questions • Training and experience | <p>33 CFR 104.220
ISPS Part A, 13.1</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Security training for all other vessel personnel | <p>33 CFR 104.225
ISPS Part A, 13.1</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Drill and exercise requirements • Conducted drill to test individual elements of the security plan • Security incident procedures • Tests response to security incident in accordance with plan • Critique drill with VSO • Identify any deficiencies with the VSP determined by drill. • Frequency | <p>33 CFR 104.230
ISPS Part A, 13.5</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Vessel record keeping requirements • Training • Drills and exercises • Transportation Security Incidents • Breaches of security • Changes in Maritime Security (MARSEC) Levels • Maintenance, calibration, and testing of security equipment • Security threats • Annual audit of the VSP • Declaration of Security (DoS) • Retained for two years | <p>33 CFR 104.235
ISPS, Part A, 10.1</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Maritime Security (MARSEC) Level coordination & implementation • Proper MARSEC Level • MARSEC level at least at current port level | <p>33 CFR 104.240</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Communications • Vessel security personnel • Facility • National and local authorities • Demonstrate communications operations consistent with VSP | <p>33 CFR 104.245
ISPS, Part A, 7.2.7</p> |
| <ul style="list-style-type: none"> <input type="checkbox"/> Declaration of Security (DoS) • Required for cruise ships or manned CDC bulk vessels and any vessel or facilities it interfaces with. Unmanned vessels do not require DOS. • Valid (for MARSEC level and effective time period)
Must have last ten or Continuing DOS reviewed at interval consistent with MARSEC level • Signed | <p>33 CFR 104.255
ISPS, Part A, 5.1</p> |

- Security systems and equipment maintenance 33 CFR 104.260
 - Testing completed IAW manufacturer's recommendation
 - Working properly, effectively functions in accordance with the VSP
 - Ship Security Alert System (SSAS)

- Security measures for access control. 33 CFR 104.265
ISPS, Part A, 7.2.2
 - Access points examined – signs posted in conspicuous locations
 - Control areas for authorized dangerous substances/devices
 - Means of identifying unauthorized personnel

- Security measures for restricted areas. 33 CFR 104.270
ISPS, Part A, 7.2.4
 - Secure areas protected
 - Properly marked
 - Control measures adequate
 - Do not conflict with safety measures

- Security measures for handling cargo 33 CFR 104.275
ISPS, Part A, 7.2.6
 - Identifying cargo tamper
 - Identifying approved cargo
 - Access point - inventory control
 - Checking cargo for dangerous substances

- Security measures for delivery of vessel stores and bunkers. 33 CFR 104.280
ISPS, Part A, 7.2.6
 - Security procedures followed
 - Standing agreements valid

- Security measures for monitoring 33 CFR 104.285
ISPS, Part A, 7.2.5
 - In accordance with VSP
 - Lighting
 - Test intrusion alarms
 - Emergency search procedures

- Security incident procedures 33 CFR 104.290
 - Witness during drill

- Additional requirements for passenger vessels and ferries 33 CFR 104.292

- Addition requirements for cruise ships 33 CFR 104.295

- Additional requirements--vessels on international voyages. 33 CFR 104.297
ISPS, Part A, 19.1
SOLAS XI-2, Regulation 5.4.1
 - ISSC issued
 - CSR updated

Note: The vessel may not have a CSR for the initial verification exam.

Vessel Security Assessment Report

33 CFR 104.300

- Reviewed and attached to VSP

Vessel Security Plan

33 CFR 104.400

- Reviewed
- Onboard manned vessels

Amendment and audit.

33 CFR 104.415

- CSO/VSO audit letter attached to VSP as required
- Audits conducted as required
(Annually)
(After vessel modifications)

Ship Security Alert System (vessels subject to SOLAS only)

ISPS Part A, 9.4.18
SOLAS XI-2, Regulation 6

- On the bridge and one other location
- Designed to prevent inadvertent activation
- Covert (unmarked, silent, and need to know)
- Tested IAW VSP

Comments:

Security Drill

- Observe security drill exercising the activation of the provisions in the VSP related to a security threat, breach, security communications, change of security level, or other security related incident or action as described in the VSP
- Drill selection and location shall be as directed by the Master and VSO. Describe:

The following list of questions is intended for use as a job aid to determine whether the vessel's security personnel and procedures are in keeping with the provisions of the Maritime Transportation Security Act, SOLAS Chapter XI-2, and the

International Ship and Port Facility Code Parts A and B. This list is by no means a complete listing of appropriate questions, but is provided as an example of appropriate questions to determine that personnel are properly trained and that meaningful security procedures are in place.

To the Ship Security Officer:

What do you do if there is a security breach? Or security threat?
How does the security alert system work? What happens if the security alert system is activated?
What do you do if the port is at a higher security level than the ship?
What are the vessel's restricted areas? How do you restrict access to these areas?
How often is the security equipment calibrated? Ask to see records.
How do you coordinate security activities with the port facility?
When would you limit shore to ship access to only one access point?
How often do you audit security activities? How do you audit a security activity? Ask for an example. Also ask to see records.
Who is the Company Security Officer? Do you have 24/7 contact information for this person? Ask to see information.
Do you have any active Declarations of Security? With whom?
How often do you hold security drills, training, or exercises? When was the last time you conducted a security drill, training session, or exercise? Ask to see associated records.
How do you report security breaches or incidents? Ask to see records.
What do you do if someone tries to bring an unauthorized weapon on board the vessel? Dangerous substance? Device?
How do you prevent unauthorized persons from coming on board?
Who on board are assigned security duties?
When was the last time the VSP was reviewed? Was it updated? Ask to see record of update.
What do you do to search persons and their belongings when they come on board?
What are your procedures to search unaccompanied baggage? How do these become more rigorous if security level increases?
How do you monitor the security of the ship when underway? When pierside? At anchor?
Do you have procedures in place to bring on board additional security personnel? Please describe.
Do you have procedures in place to ensure security for cargo handling? Please describe.
How do you safeguard the Vessel Security Plan?

To Crew members having security responsibilities:

Who is the Vessel Security Officer?
What do you do if there is a security breach? Or security threat?
How does the security alert system work? What happens if the security alert system is activated?
What are the vessel's restricted areas? How do restrict access to these areas?
When was the last time you participated in a security drill, training session, or exercise?
How do you report security breaches or incidents?
What do you do if someone tries to bring an unauthorized weapon on board the vessel? Dangerous substance? Device?
How do you prevent unauthorized persons from coming on board?
What do you do to search persons and their belongings when they come on board?
What are your procedures to search unaccompanied baggage?
How do you monitor the security of the ship when underway? When pierside? At anchor?

To Crewmembers not having security responsibilities:

Who is the Vessel Security Officer?
What do you do if there is a security breach? Or security threat?

<p>Section C Additional Information</p>

Compliance documentation.

33 CFR 104.120
ISPS, Part A, 9.1

Inspectors may ensure the validity and accuracy of compliance documentation during the course of vessel inspections. When the VSP is not approved, the attending inspector may verify the existence of an acknowledgement letter from the MSC stating that the plan is currently under review. The vessel may continue to operate so long as it is in full compliance with the submitted plan. The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the vessel does not have any of the required documentation

For vessel operating under an Alternative Security Program (ASP), the inspector should verify that a copy of the Coast Guard approved Alternative Security Program is available and that the ASP includes:

- *a specific security assessment report.*
- *a letter from the owner or operator certifying which ASP is being used, and that the facility or vessel is in full compliance with that program.*
- *A COTP letter specifically authorizing the facility to operate.*

Foreign Non-SOLAS Vessels:

For foreign vessels not subject to SOLAS Chapter XI, the inspector may verify:

- *a valid letter from MSC attesting to the vessel's compliance with 33 CFR 104 along with an approved VSP.*
- *An approved ASP along with a letter from the master that the vessel is in full compliance with the security plan may also be accepted.*
- *A valid ISSC certificate.*

Unmanned Vessels:

Approval letters (for VSP or ASP) for unmanned vessels are required by regulation to be carried on board. However, as required by regulation, the VSP / ASP should not be maintained on board the vessels, but must be maintained in a secure location. During scheduled inspections, the plans must be made available to the Coast Guard upon request.

When scheduling inspections, the inspector should coordinate with owner/operators to ensure VSP/ASP availability at the time of inspection.

International Ship Security Certificate-ISSC (U.S. SOLAS Vessels only):

This document will be issued by the local OCMI following a satisfactory initial, or renewal verification of the VSP. The certificate carries a 5-year expiration date and has a minimum provision for one periodic verification.

Continuous Synopsis Records-CSR (U.S. SOLAS Vessels only):

The CSR should be accurate and reflect current vessel information. Updates to vessel files may be required. Discrepancies found in the CSR should be reported to the vessel master and/or owner so that corrective actions can be taken.

Noncompliance.

33 CFR 104.125

A noncompliance may be viewed similar to deviation from the 33 CFR 164 regulations. The COTP must decide if noncompliance represents a significant risk, and issue a COTP order to suspend operations or give COTP written authority to continue operations. If the condition is to persist while the vessel is transiting other COTP zones, each COTP or, in cases covered under 33 CFR 106.120, the cognizant District Commander, may agree to the measures imposed, consider additional measures, or prohibit entry until the deficiency is corrected.

Waivers.

33 CFR 104.130

The inspector will need to examine the waiver approval letter and verify that any conditions expressed are implemented. Since the condition placed on the waiver is meant to ensure the overall security of the vessel, the letter must be fully implemented. A vessel that is using an ASP is not eligible to request a waiver, since the regulations require an ASP plan to be implemented in its entirety.

Equivalents.

33 CFR 104.135

The inspector will need to exam the approval letter of any equivalencies that may exist. Equivalencies granted after the security plan has been approved should be noted in an amendment to the plan. Vessels that are using an ASP may not use an equivalency, since the regulations require the ASP plan to be implemented in its "entirety".

Alternative Security Programs.

33 CFR 104.140

An inspector of a vessel covered under an Alternative Security Program (ASP) approved by the Commandant (G-MP) should find that a copy of the ASP is on site. In addition, there should be a copy of the letter sent by the company to the appropriate plan approval authority identifying which ASP they have implemented, which vessels are covered and attesting that they are in full compliance with the ASP. It will be the responsibility of the individual performing the on-site inspection to confirm that the vessel, in compliance with the Alternative Security Program as it was approved, including any conditions of approval stipulated by the Commandant (G-MP), and in its entirety.

An area where an inspector would see an appropriate departure from a strict interpretation of the guidelines in 33 CFR parts 104 and 105 involves joint vessel/facility ASP's. In those cases where both the vessels and the facilities serving those vessels are owned and/or operated by the same entity, an alternative plan may recognize that the same party is responsible for security in both areas and approve an approach that addresses vulnerabilities and mitigation strategies for the vessels and the facility under the umbrella of one ASP. The practical result will be that the inspector will not be using separate plans for the vessels and the facility to determine compliance and, likewise, will not see some citations addressed in the plan if they are redundant between 104 and 105.

Maritime Security (MARSEC) Directive.

33 CFR 104.145

Inspectors must have a thorough knowledge of the MARSEC Directives that have been issued, and how they may affect the vessels in their respective COTP/OCMI zones. It will be incumbent upon the inspector to ensure that vessels that are affected have incorporated the MARSEC Directives into their security plans and measures.

Company Security Officer (CSO).

33 CFR 104.210
ISPS, Part A, 11.1
ISPS, Part B, 8,9 & 13

If the company has multiple CSO or if the CSO has delegated his/her duties in accordance with the regulations, the inspector may make inquiries of the designated crewmember to ensure that they understand that the ultimate responsibility rests with the CSO. In particular, an effective communication arrangement would be necessary to comply with the intent of the regulations. The CSO may demonstrate satisfactory knowledge of the VSP by asking questions such as:

- *Describe the security organization of the company and its vessels*
- *How do you keep your company's vessels apprised of changing security levels?*
- *Have any problems or deficiencies been identified during annual audits?*

Vessel Security Officer (VSO).

33 CFR 104.215
ISPS, Part A, 12.1
ISPS, Part B, 8,9 & 13

Inspectors may evaluate the ability of the VSO to perform the required duties and responsibilities in relation to: other assignments within the organization; multiple facility assignments; and retention of responsibility for delegated duties.

Inspectors may request confirmation that the qualifications of the VSO are substantially consistent with the requirements.

Inspectors may measure the performance of the responsibilities of the VSO required by the regulations by interviewing relevant personnel, reviewing records and documents required under this part, observation of drills, exercises, and actual incidents.

The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the vessel does not have a designated VSO on board a manned vessel.

Company and vessel personnel with security duties.

33 CFR 104.220
ISPS Part A/B, 13.1

The inspector may ask the crew to verify that they have knowledge of the required information through observation and conversation with the crewmembers regarding their security responsibilities. The questions may be kept informal, but should probe the depth of knowledge that an individual possesses concerning their assigned job. The questions may be directed at the security threats that the person may be expected to encounter, such as what type of behavior(s) would be considered "suspicious" when passengers are boarding the vessel. Although the average crewmember does not need to (nor should not) know the entire security plan, the ability to identify the CSO, or VSO and the aspects of the security plan that pertain to his/her station would demonstrate sufficient knowledge of the relevant sections.

Security training for all other vessel personnel.

33 CFR 104.225
ISPS Part A/B, 13.1

The inspector may verify that others on a vessel are adequately trained by direct observation and questioning, but at a reduced level from the crew.

The inspector should also make use of personnel training records required under separate regulations.

Drill and exercise requirements.

33 CFR 104.230
ISPS Part A/B, 13.5

The drill should demonstrate proper performance of the VSP. Each crew member may demonstrate their competency during the course of the drill. The inspector should critique the drill with the VSO, and discuss corrective action if necessary to address any deficiencies noted. Any deficiencies with the VSP detected during the drill may be corrected by directing the owner in writing to submit an amendment per the regulations. Such a requirement should be allowed at least 60 days. The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if in the opinion of the inspector, the measures contained in the VSP are not demonstrated by the crew due to their training, knowledge, or if an the number of crewmembers is insufficient to accomplish the security measure.

The inspector may accept proof of participation in an Area Maritime Security exercise to meet the requirement for an annual exercise if the owner furnishes proof of participation.

Vessel record keeping requirements.

33 CFR 104.235
ISPS, Part A/B, 10.1

Inspectors should ensure that the VSO maintains the required records for security related evolutions such as training, drills and exercises, security threats, and maintenance of security equipment. These records may be kept in paper or electronic format and must be protected from unauthorized access or disclosure. The ISPS Code, part A requires that vessels subject to ISPS maintain records on board the vessel (Note: from Preamble). All other vessels record categories (except the Declaration of Security (DoS) on manned vessels) need not be stored onboard, but must be made available to the Coast Guard upon request.

Maritime Security (MARSEC) Level coordination and implementation.

33 CFR 104.240

Inspectors need to be aware of the prevailing MARSEC Level before they visit a vessel, as this will determine which security measures will be in place at the time of inspection. For example, if the port is at MARSEC Level 2 or 3 the vessel should have in place all the security measures required by their plan for at MARSEC Level 1, plus the measures required by the higher MARSEC Level. A vessel may not suspend operations to avoid enacting a measure described in the VSP unless this option is a specific provision of the VSP. Of course, an owner or operator may suspend operations at any time to protect the security of the vessel or operation.

Communications.

33 CFR 104.245
ISPS, Part A, 7.2.7

Inspectors should examine the communication systems and procedures established under the VSP. Inspectors may question the VSO to ascertain the adequacy of provided communication equipment and procedures, and testing may be necessary. Communications will be considered effective if the VSO can demonstrate operation.

Declaration of Security (DoS).

3

3 CFR 104.255
ISPS, Part A/B, 5.1

Inspectors should ensure adequacy of procedures for requesting and handling requests for DoS requests; review current and historical records for adequacy of DoS's, including signatures of VSO, FSO, their designated representatives and MARSEC level. Inspectors should also observe vessel and facility operations to ensure compliance with the DoS. The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the required DoS are not on board. The vessels class society may be required to conduct an ISM audit to address this deficiency and prevent future Port State Control actions in foreign ports.

In addition, inspectors should verify that continuing DoS's have not exceeded the required time periods (90 days MARSEC 1, 30 days MARSEC 2 and no continuing DoS authorized for MARSEC level 3).

Security systems and equipment maintenance.

33 CFR 104.260

Inspectors should review records related to inspection, testing and calibration of security equipment and frequency of related actions to ensure that these are being conducted. Records available for review and consultation should include, but are not limited to, manufacturers maintenance recommendations, system plans or schematics, test records/logs, and deficiencies/system failures with repair documentation. Inspectors are encouraged ask the VSO questions related to inspection, testing, calibration, and maintenance of security equipment. Inspectors may also question the VSO and other personnel with security duties how the system (and subsystems) work, including a demonstration of system functionality and any appropriate tests/alerts. The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if a security system is inoperable. A system might mean one or more components that enable the equipment to perform the required service. The failure of one component on a large system that has back-up measures would not be as significant as the failure of a single component of a small system with no back-up. The inspector may consider other measures to mitigate risk if required to maintain acceptable security, or if requested by the operator to continue operations (e.g., a sentry in place of an intrusion alarm. If such alternative is required or requested, the overall effect on vessel operations and staffing levels must be considered.

Security measures for access control.

33 CFR 104.265
ISPS, Part A, 7.2.2
ISPS, Part B, 9.9

Inspectors may observe procedures in place to deter unauthorized access of people and the unauthorized introduction of dangerous substances and devices, including any device intended to damage or destroy persons, vessels, facilities, or ports and whether security personnel show competence in these duties. Passenger vessels and ferries may comply with the measures contained in 33 CFR 104.292. Inspectors should cite the approved Security Plan and verify that the security measures specified for the current MARSEC level are in effect and deemed adequate. These measures include, but are not limited to, access points examined (gates, gangways, ramps, piers), identification procedures (personnel, vehicles, and vendors), and entry restrictions/prohibitions regarding access to the vessel (guards, fences, checkpoints, etc). In addition to the current MARSEC level, measures for other MARSEC levels should be examined. Inspectors should question VSOs and other personnel with security duties regarding additional security measures for elevations in MARSEC level requirements as specified in their specific Security Plan. This includes, but is not limited to: additional personnel, equipment, further limitations on access, and additional screening procedures. As an example, additional measures may include limiting the number of access points, deterring waterside access, suspending operations, and evacuation measures. The inspector should verify that the VSP addresses security measures for periods when the vessel is unattended, such as for daytime only operations. The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the security measures for access control are grossly inadequate due to failure to comply with the VSP, or the VSP does not address the actual situation (e.g., the security personnel assigned can not

control access because of the volume of persons attempting to enter).

Security measures for restricted areas.

33 CFR 104.270
ISPS, Part A, 7.2.4
ISPS, Part B, 9.18

Inspectors may observe procedures in place to prevent and deter unauthorized access to those Restricted Areas identified in the Security Plan. These areas include, but are not limited to, storage and supply sites, shore areas immediately adjacent to each vessel moored at a facility, areas containing critical infrastructure/equipment (power, water, command/control, etc), and locations designed for loading cargo. Inspectors should cite the approved Security Plan and verify Restricted Area status for the current MARSEC level is in effect and deemed adequate. This includes, but is not limited to, the verification of locks or secured access points, locations properly marked and identified as Restricted Areas, surveillance equipment, and guards or patrols. Inspectors should question VSOs and other personnel with security duties regarding additional Restricted Area security measures for elevations in MARSEC level requirements as specified in their Security Plan. This includes, but is not limited to: additional personnel, equipment, further limitations on restricted areas, and additional surveillance procedures. Nothing in this section shall compromise the safety of the vessel, crew, or passengers (i.e., locks that block emergency escape scuttles). The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the measures for controlling access to restricted areas leave these areas vulnerable with not means to mitigate the risk.

Security measures for handling cargo.

33 CFR 104.275
ISPS, Part A, 7.2.6
ISPS, Part B, 9.25

Inspectors may observe procedures in place to ensure the security of cargo handling operations and whether security personnel show competence in these duties. Inspectors should cite the approved Security Plan and verify Cargo Handling Security Procedures for the current MARSEC level are in effect and deemed adequate. These procedures include, but are not limited to, deterrence of cargo tampering, identification of unauthorized cargo (e.g., inventory control), and checking cargo for dangerous or unauthorized substances. In particular, a vessel's inventory procedures (logs, etc) should be examined to ensure all hazmat and CDCs are accurately tracked and accounted for. Inspectors should question VSOs and other personnel with security duties regarding additional cargo handling security measures for elevations in MARSEC level requirements as specified in their Security Plan. This includes, but is not limited to: increased screening of cargo and inventory, search of delivery vehicles, vehicle escort provisions, additional measures to prevent tampering (e.g., seals), and suspending operation.

Security measures for delivery of vessel stores and bunkers.

33 CFR 104.280
ISPS, Part A, 7.2.6
ISPS, Part B, 9.33

The security of vessel deliveries and bunkering operations must be in accordance with the VSP. Inspectors may observe procedures in place to ensure that security personnel demonstrate competence in these duties. Inspectors should cite the approved Security Plan and verify vessel delivery and bunkering procedures for the current MARSEC level are in effect and deemed adequate. These procedures include, but are not limited to; deterrence of tampering to stores, supplies and bunkers, identification of unauthorized deliveries (inventory control), and checking deliveries for dangerous or unauthorized substances. Inspectors should question VSOs and other personnel with security duties regarding additional vessel delivery and bunkering security measures for elevations in MARSEC level requirements as specified in their Security Plan. This includes, but is not limited to: increased screening of stores and inventory, search of delivery vehicles, vehicle escort provisions, additional measures to prevent tampering (seals), and suspending operations. Inspectors should determine how recurring and non-recurring deliveries are addressed in the Security Plan. The inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the security measures for delivery of vessel stores and bunkers are grossly inadequate to protect the vessel.

Security measures for monitoring.

33 CFR 104.285
ISPS, Part A, 7.2.5
ISPS, Part B, 9.42

The VSP may specify a variety of measures for monitoring. It is generally the practice to conduct vessel inspections during daylight hours, which might make determining if some measures are adequate (e.g., lighting). Some measures such as intrusion may be tested at any time. In any case, if the inspector is in doubt as to whether a measure is adequate, a demonstration may be necessary. The inspector should review the measures that are specified in the VSP and require performance testing of any measure that appears questionable.

Security incident procedures.

33 CFR 104.290

In verifying compliance with these sections, the individual performing the on-site inspection should confirm that the vessel has the equipment and/or personnel necessary to carryout the procedure as detailed in the security plan. For example, if the plan specifies that, in the event of a security incident, the VSO will notify authorities via radio, does the vessel have a radio that is capable of communicating with the appropriate authorities? Drill should incorporate security incidents procedures that are outlined in the plan.

Additional requirements--passenger vessels and ferries.

33 CFR 104.292

One important item that the inspector should keep in mind is the fact that the Vessel Security Plans were approved without anyone visiting the vessel. Therefore, if the inspector finds that the alternatives the vessel implemented do not provide the equivalent level of security provided by ID checks and screenings, the inspector should require the vessel owner to amend the VSP.

Additional requirements--cruise ships.

33 CFR 104.295

If the inspector finds areas of the plan that is not adequate or, not accurate (based on the configuration of the vessel, i.e. Vessel Security Plan quoted that the vessel did not have a radio room, but an onboard visit to the vessel found otherwise) the plan would need to be amended. Such cases may be common, since these plans were approved without on-site visits.

Additional requirements--vessels on international voyages.

33 CFR 104.297
ISPS, Part A, 19.1

Prior to undertaking an international voyage the owner/operator of a vessel subject to SOLAS without a current ISSC will need to request an inspection from the local Officer in Charge Marine Inspection. After the inspection is completed, and the inspector finds that the provisions of Part 104 and the ISPS Code have been addressed, the vessel will receive an International Ship Security Certificate (ISSC), valid for a maximum of 5 years. An ISSC may not be issued unless a vessel is in full compliance, i.e., no deficiencies may be issued. An ISSC may be issued for less than 5 years in order that it may harmonize with the Certificate of Inspection or other international certificates.

Assessment

33 CFR 104.300

The inspector should consider whether the measures found in 33 CFR 104.300 (d) have been adequately addressed in the assessment during the verification. If one or more of these considerations do not appear to be addressed, the inspector should discuss it with the VSO or CSO as appropriate. The inspector may consider asking the name and qualifications of any third party expert consulted during the assessment.

Amendment and Audit.

33 CFR 104.415

Amendments to VSP:

The VSP is a living document, able to change to incorporate changes or lessons learned. Local COTP's may initiate amendments, as well as conduct onsite verification of plan changes initiated by the facility/vessel owner or operator. VSP amendments should be tracked and recorded in the vessel file. To ensure amendments are consistent and meet regulatory intent, changes to plans will be reviewed and approved by MSC. For that reason, there are specific timeframes for amendments spelled out in the regulations.

Amendments to ASP

Should an enforcement inspection reveal that an owner/operator has correctly implemented an approved ASP in its entirety but security vulnerabilities exist in the vessel operation, the COTP shall be advised. Under 33 CFR 104.415 (a) (ii), the inspector can determine that an amendment is necessary and forward the recommendation through the chain of command to Commandant (G-MP). If deemed appropriate, (G-MP) will advise the organization that submitted the ASP for approval accordingly. Following such notification, it will be necessary for the original submitting organization to provide their proposed amendment to the Commandant (G-MP) for review and approval. If the submitting organization does not wish to amend the ASP, the vessel owner must submit a VSP for the vessel to the MSC. Amendments only include changes that are required or proposed to the plan template.

Audits:

At a minimum, the regulations require the CSO, or VSO to ensure an annual audit is performed by personnel with knowledge in conducting audits and inspections, and control and monitoring techniques. The use of independent auditors is allowed. Vessels are also given flexibility in how they assign auditors depending on the unique nature and size of the company and vessels. Audits may also be required due to structure modifications on the vessel, or changes in operations, security measures, and response plans. Other vessel changes that impact the VSP may also trigger an audit. Audits may result in amendments to the overall VSP.

Nothing in the regulations prohibits the audit from being performed in conjunction with the scheduled security inspection conducted by the Coast Guard, as long as an audit is done at least every calendar year. However, the initial audit must be complete not more than one year from the VSP approval date. If a combined inspection/audit is performed, the inspector may review the qualifications of the auditor to ensure that the regulations for auditor's qualifications are met.

Ship Security Alerts System

ISPS 9.4.18
SOLAS XI-2, Reg 6

The Ship Security Alert System (SSAS) is required only on vessels that are subject to SOLAS. The inspector should review the applicable requirements to determine when the vessel must comply. ISPS requires the VSP to contain information regarding the SSAS, but allows this section to be kept separate from the other sections to protect the details of its operation from compromise. The inspector should ask the VSO to examine this section and review the information. The inspector must take care to safeguard the location from unauthorized personnel, but should test it in accordance with the procedures found in the VSP. If the SSAS is part of the approved plan, the inspector should issue a "no sail" requirement or COTP order after consulting the OCMI or COTP if the SSAS is found inoperable, or is not covert.

Glossary of Terms/Acronyms

AGENT

Vessel representative hired by the ship's owners. Ship's agent may be tasked with various jobs such as: ensuring proper vessel documentation and compliance.

ALTERNATIVE SECURITY PROGRAM

A third-party or industry organization developed standard that the Commandant has determined provides an equivalent level of security to that established by this subchapter.

BARGE

A non-self-propelled vessel (46 CFR 24.10-1)

CERTAIN DANGEROUS CARGO (CDC)

Means the same as defined in 33 CFR 160.203.

CHARTERER

Any person or entity that exercises operational control over a vessel subject to the requirements of this subchapter.

CONTRACTING GOVERNMENT

Any government of a nation that is a signatory to SOLAS.

COTP

Captain of the Port.

CRUISE SHIP

Any vessel over 100 gross register tons, carrying more than 12 passengers for hire which makes voyages lasting more than 24 hours, of which any part is on the high seas. Passengers from cruise ships are embarked or disembarked in the U.S. or its territories. Cruise ships do not include ferries that hold Coast Guard Certificates of Inspection endorsed for "Lakes, Bays, and Sounds", that transit international waters for only short periods of time on frequent schedules.

CSO

Company Security Officer

DECLARATION OF SECURITY

An agreement between a vessel and a port facility that addresses security requirements that are shared between a ship and a facility and outlines both ship and facility responsibilities.

DRILL

A training event that tests at least one component of the AMS, vessel, or facility security plan and is used to maintain a high level of security readiness.

EXERCISE

A comprehensive training event involving several of the functional elements of the AMS, vessel, or facility security plan, and which tests communications, coordination, resource availability, and response.

FERRY

a vessel which is limited in its use to the carriage of deck passengers or vehicles or both, operates on a short run on a frequent schedule between two or more points over the most direct water route, other than in ocean or coastwise service.

INTERNATIONAL MARITIME ORGANIZATION (IMO)

A specialized agency of the United Nations concerned solely with maritime affairs and responsible for international treaties, conventions, resolutions and codes to improve Maritime safety.

ISPS CODE

The International Ship and Port Facility Security Code, as incorporated into SOLAS, is a set of security requirements for vessels subject on international voyages.

MARITIME SECURITY (MARSEC) DIRECTIVE

An instruction issued by the Commandant, or his/her delegate, mandating specific security measures for vessels and facilities that may be involved in a transportation security incident.

MASTER

The holder of a valid license that authorizes the individual to serve as a Master, operator, or person in charge of the rated vessel and who is serving in that capacity. For the purposes of this subchapter, Master also includes the Person in Charge of a MODU, and the operator of an uninspected towing vessel.

OWNER OR OPERATOR

Any person or entity that maintains operational control over a vessel subject to the requirements of this subchapter.

PASSENGER VESSEL

- (1) On an international voyage, a vessel carrying more than 12 passengers; and
- (2) On other than an international voyage:
 - (i) A vessel of at least 100 gross register tons carrying more than 12 passengers, including at least one passenger-for-hire;
 - (ii) A vessel of less than 100 gross register tons carrying more than 6 passengers, including at least one passenger-for-hire;
 - (iii) A vessel that is chartered and carrying more than 12 passengers;
 - (iv) A submersible vessel that is carrying at least one passenger-for-hire; or
 - (v) A wing-in-ground craft, regardless of tonnage, that is carrying at least one passenger-for-hire.

SAFETY OF LIFE AT SEA (SOLAS)

The International Convention for the Safety of Life at Sea sets certain safety requirements for vessels on an international voyage.

SECURITY SYSTEM

A device or multiple devices designed, installed and operated to monitor, detect, observe or communicate about activity that may pose a security threat in a location or locations on a vessel or facility.

STCW

The International Convention on Standards of Training, Certification and Watchkeeping for Seafarers.

VESSEL SECURITY ASSESSMENT (VSA)

An analysis that examines and evaluates the vessel and its operations taking into account possible threats, vulnerabilities, and existing protective measures, procedures and operations.

VESSEL SECURITY OFFICER (VSO)

The person onboard the vessel, accountable to the Master, designated by the Company as responsible for security of the vessel, including implementation and maintenance of the Vessel Security Plan, and for liaison with the Facility Security Officer and the vessel's Company Security Officer. (Also called SSO – Ship Security Officer)

VESSEL SECURITY PLAN (VSP)

The plan developed to ensure the application of security measures designed to protect the vessel and the facility that the vessel is servicing or interacting with, the vessel's cargoes, and persons on board at the respective MARSEC Levels.

VESSEL STORES

- (1) Materials that are on board a vessel for the upkeep, maintenance, safety, operation or navigation of the vessel; and
- (2) Materials for the safety or comfort of the vessel's passengers or crew, including any provisions for the vessel's passengers or crew.