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MOC Policy Letter
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COMDT (G-MOC)

To: Distribution

Subj: ISSUING INTERNATIONAL SHIP SECURITY CERTIFICATES (ISSC) TO VESSELS NOT SUBJECT TO SOLAS

Ref: (a) International Ship and Port Facility Security (ISPS) Code
(b) International Convention for the Safety of Life at Sea (SOLAS), 1974

1. Purpose. To establish procedures for issuing an ISSC to vessels not subject to SOLAS reference (b).

2. Discussion.

a. In September 2004, G-MOC had to address the issue of the Government of Mexico requiring ISPS certificates onboard MODUs of over 100 GRT. The Coast Guard had no policy or procedure for providing a vessel an ISSC when SOLAS did not require one. In this case, a non-self propelled MODU.

b. To facilitate the operation of U.S. maritime industry the Coast Guard will issue an ISSC to a U.S. flag vessel even though the SOLAS convention does not apply to the vessel. Owners requesting the ISSC shall ensure that the vessel complies with the applicable requirements as long as the vessel holds the ISSC.

c. The ISPS Code, Part A, paragraph 19.1.1.1, outlines the requirements of a Flag State to issue an ISSC, including verification that the security system and any associated security equipment fully complies with the *applicable* requirements of chapter XI-2 and Part A of the ISPS Code. For vessels that do not meet the applicability of SOLAS 1.A.1, it is the Coast Guard's interpretation that the applicable sections will include all parts of SOLAS XI-2 and the ISPS Code, with the exception of any requirements associated with the Ship Security Alert System (SSAS). However, vessels may voluntarily carry SSAS equipment. A vessel equipped with SSAS equipment must comply with the requirements of ISPS Part A, 9.4.17 and .18. In addition, the vessel must fully comply with all aspects of its approved Ship Security Plan (SSP).

2. Action. OCMI's shall issue an ISSC upon request to any vessel that complies with the applicable portions of SOLAS XI-2, the ISPS Code, and an approved SSP as noted above, regardless of SOLAS applicability; and carry out an ISPS exam during annual inspections.

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