

Palau International Ship Registry



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MARINE NOTICE 141.2

To: SHIPOWNERS, MANAGERS, MASTERS, DEPUTY REGISTRARS, AND RECOGNIZED ORGANIZATIONS

Subject: USE OF PRIVATELY CONTRACTED ARMED SECURITY PERSONNEL (PCASP)

1. References

- 1.1 IMO Circular MSC.1/Circ.1406, Rev 3, *Revised Interim Recommendations for Flag States Regarding the Use of Privately Contracted Armed Security Personnel on Board Ships in the High-Risk Area*, dated June 12th, 2015
- 1.2 IMO Circular MSC.1/Circ.1443, *Interim Guidance to Private Maritime Security Companies Providing Privately Contracted Armed Security Personnel on Board Ships in the High-Risk Area*, dated May 25th, 2012.
- 1.3 IMO Circular MSC.1/Circ.1405, Rev.2, *Revised Interim Guidance to Shipowners, Ship Operators, and Shipmasters on the Use of Privately Contracted Armed Security Personnel on Board Ships in the High-Risk Area*, dated May 25th, 2012.
- 1.4 IMO Circular MSC.1/Circ.1339, *Piracy and Armed Robbery against Ships in Waters off the Coast of Somalia. Best Management Practices for Protection against Somalia Based Piracy* dated September 14th, 2011.

2. Introduction

- 2.1 The increased threat to commercial shipping by Somalia and other high-risk areas where piracy is present led to extended use of armed guards and a marked expansion in the number of firms offering armed maritime security services for vessels transiting the High-Risk Area (HRA). The Palau Ship Registry Administrator do not endorse or prohibits the use of privately contracted armed security personnel (PCASP), however, realizing the nature of the trade within high-piracy areas that the process of identifying reliable, professional and experienced private providers of armed security can be difficult.
- 2.2 The decision on the contracting of PCASP on board ships is a complex one for a ship owner. The absence of applicable Regulation and industry self-regulation coupled with complex Legal requirements governing the legitimate transport, carriage and use of firearms gives cause for concern. This situation



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becomes further complicated by the rapid growth in the number of Private Maritime Security Companies (PMSC) and doubts about the capabilities and the maturity of some of these companies.

3. Purpose

- 3.1 The purpose of this Marine Notice is to provide guidance to shipowners, ship operators and shipmasters considering the use of PCASP on board ships by providing protection against piracy.
- 3.2 The use of PCASP should not be considered as an alternative to Best Management Practices (BMP) and other protective measures. Placing armed guards on board, as means to secure and protect the ship and its crew, should only be considered after a Risk Assessment has been carried out. It is also important to involve the Master in the decision-making process.

4. Applicability

- 4.1 The following types of The Republic of Palau flagged vessels are subject to the ISPS Code and while operating in High Risk Areas shall comply with the SSP and BMP accordingly:
 - 4.1.1 Passenger ships, including high-speed passenger craft;
 - 4.1.2 Cargo ships, including high-speed craft, of 500 gross tonnage (ITC 69) and upwards;
 - 4.1.3 Special Purpose Ships of 500 gross tonnage and above; and
 - 4.1.4 Self-propelled mobile offshore drilling units capable of making international voyages unassisted and unescorted when underway and not on location.
- 4.2 Owners/Managers of yachts (commercial and private) are advised not to navigate in High Risk Areas due to their low speed and low freeboard, however, all yachts registered under the Palau Flag navigating in HRA that are considering contracting armed security personnel should follow this Marine Notice.

5. Definition

- 5.1 High Risk Area: an area as defined in the BMP unless otherwise defined by The Palau Ship Registry Administrator.



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- 5.2 Private Maritime Security Companies (PMSC): Private contractors employed to provide security personnel, both armed and unarmed, on board for protection against piracy.
 - 5.3 Privately Contracted Armed Security Personnel (PCASP): armed employees of PMSC.
6. Requirements
- 6.1 The Republic of Palau shipowners and operators with vessels identified in section 4, above, must, along with the Master, carry out a Risk Assessment of their vessel(s) to determine the likelihood and consequences of a piracy attack, an armed attack, hijacking or terrorism and identify and incorporate prevention, mitigation and recovery measures in their SSPs, taking into consideration the Guidance contained in MSC.1/Circ.1337, along with the BMP Guidelines also provided.
 - 6.2 Incorporation of relevant provisions on piracy, armed robbery, terrorism and armed attack into SSPs is required immediately, but need not be verified and approved until the next scheduled ISM/ ISPS Code Audit.
7. Reporting
- 7.1 The Palau Ship Registry Administrator recognizes that an essential part of preventing, deterring and suppressing attacks is prompt reporting to the proper Authorities and Organizations both during and post-incident. As a result, not only must be reported and addressed by Companies and ships as part of their BMP in accordance with IMO Resolution A.683(17), Prevention and Suppression of Piracy and Armed Robbery Against Ships, but also, the Administrator is required to report in detail all incidents of piracy and armed robbery of its vessels to the International Maritime Organization (IMO).
 - 7.2 Initial Notification and Reporting for the area of Suez, Gulf of Aden (GoA), the Somali Basin Arabian Sea and Indian Ocean.



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- 7.2.1 Ships must participate in the pre-transit registration and notification requirements outlined in section 5.1.4 and 5.1.5 of the BMP for each transit made. All ships transiting the Red Sea, GoA, the Somali Basin, Gulf of Oman, Arabian Sea and Western Indian Ocean are being tracked and monitored through Long-Range Identification and Tracking (LRIT). The Palau Ship Registry Administrator strongly recommends to shipowners and operators to register Palau Registered Vessels with MSCHOA or the UK Maritime Trade Operations (UKMTO).
- 7.2.2 Ship Security Alert System (SSAS): The following ships are required to comply with SOLAS Regulation XI-2/6 for a SSAS:
- passenger ships, including high-speed passenger crafts;
 - cargo ships, including high-speed craft, of 500 gross tons and above; and
 - mechanically propelled mobile offshore drilling units as defined in SOLAS regulation IX/1, not on location and on location in piracy High Risk Areas.
- 7.2.3 If attacked by pirates, or there is a clear and imminent threat of danger, a ship should immediately activate its SSAS. This will alert the Company Security Officer (CSO) and the Administrator. Additionally, if the ship is subscribed to SSRS it will also directly alert naval/military forces. If a ship has not subscribed to SSRS, UKMTO should be notified after SSAS activation.
- 7.2.4 The SSA message must reach the Palau Ship Registry Administrator and CSO from any point along the vessel's intended route and must include the following:
- Vessel's name;
 - IMO Ship Identification Number;
 - Call Sign;
 - Maritime Mobile Service Identity;
 - Date and time;
 - Position;
 - Course and speed;
 - Name of CSO and 24/7 phone number;
 - Name of alternate CSO and 24/7 phone number



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- A message stating that the SSAS has been activated and, indicating that the ship is under threat or it has been compromised.

7.2.5 Ship Security Reporting System (SSRS): Shipowners are Authorized and strongly recommended to subscribe to the SSRS because it provides a real-time link between ship operations and naval/military operations, by enhancing the counter-piracy effectiveness of the existing SSAS.

7.2.6 The SSAS contact email for the Palau Ship Registry Administrator is inmarsatctest@palaureg.com and this should be programmed in the SASS system.

7.2.7 The SSRS is provided through a commercial service that continuously monitors SSAS alerts and ship position reports, filters out alerts emanating from outside the High-Risk Area and depending upon the location of the report, routes the information in real time to participating Naval Operations Centres. Shipowners receive a notification email confirming that security alert/position report information is being routed to a Naval Operations Centre.

7.2.8 Once SSRS has been activated, immediately verify SSRS activation with the UKMTO. The SSRS service can be accessed from the commercial website: www.ssrs.org.

7.3 Strait of Hormuz and Arabian Gulf : when transiting the Strait of Hormuz, Gulf of Oman and Arabian Gulf, as soon as the Master feels that a threat is developing, he/she should immediately activate the SSAS and call to report hostile or potentially hostile action (including suspicious activity) to the COMUSNAVCENT Battle watch Captain and UKMTO.

7.4 Other High-Risk Areas

7.4.1 When transiting these areas, as soon as the Master feels that a threat is developing, he/she should immediately activate the SSAS to alert the Company Security Officer and the Palau Ship Registry Administrator and call to report hostile or potentially hostile action (including suspicious activity) to the local authorities, Regional Cooperation Agreement on Combating Piracy and Armed Robbery



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against Ships in Asia (ReCAAP) and/or International Maritime Bureau (IMB) (see Appendix I for contact details) depending on ship location. This other High Risk Areas include: Strait of Hormuz and Gulf of Oman, Waters Near Yemen (Bab-al-Mandeb Strait, Red Sea and the GoA along the coast of Yemen), Indian Ocean (eastern part of the Indian Ocean approaching closer to Indian west and south coast, Lakshadweep/Minicoy Islands, northern Maldives and as far south as the Mozambique Channel and 15°S latitude) South East Asia and South China (vicinity of the Anambas, Natuna, Mangka Islands, Subi Besar and Merundung area), West Africa Benin (Cotonou), Guinea (Conakry), Cameroon (Douala Outer Anchorage) and Nigeria (Lagos and Bonny River), Latin America (off the Pacific Coast of Latin America, particularly at the Peruvian port of Callao and off the coast of Venezuela)

8. Reporting of an Incident and Follow up

- 8.1 Masters, owners or operators must immediately (within 24 hours) report by fax or email the occurrence of all incidents of piracy and armed robbery, armed attacks, attempted or actual hijacking, terrorism or other hostile or suspicious activity, including apparent surveillance being conducted by small vessels, on or near their vessels to: Palau International Ship Registry, Europe Head Office Piraeus, Greece.
- 8.2 The report should be submitted to the Palau Ship Registry Administrator in the form set up in annex I.
- 8.3 Reports received by the Administrator will be transmitted to:
 - National Geospatial-Intelligence Agency (NGA), Bethesda, MD, USA;
 - IMO, Maritime Safety Department, London;
 - IMB, Essex, UK; and
 - The International Shipping Federation, London.



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9. Contact

9.1 Any inquiries concerning the subject for this Marine Notice should be directed to the Head Office of Palau Ship Registry Administrator at technical@palaureg.com

****This Marine Notice supersedes
Marine Notice 141.1**

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ANNEX I

F.020 - REPORT OF PIRACY AND/OR ARMED ROBBERY AGAINST VESSELS

ANNEX II

IMPORTANT CONTACT INFORMATION

The following authorities have roles in combating piracy and other attacks against merchant shipping.

1. MSCHOA (Maritime Security Centre Horn of Africa)
 - 1.1 MSCHOA is the planning and coordination authority for EU Naval Forces (EUNAVFOR). A Ship and its passage plan should be registered with MSCHOA at <http://www.mschoa.org> prior to entering the High Risk Area (including the Internationally Recommended Transit Corridor (IRTC)).
Note that the EUNAVFOR operational area does not extend East of 65°East.
 - 1.2 MSCHOA may be reached directly at:
Phone: +44 (0) 1923 958545
Fax: +44 (0) 1923 958520
Email: postmaster@mschoa.org
2. UKMTO (United Kingdom Marine Trade Operations)
 - 2.1 UKMTO office in Dubai is the first point of contact for ships in the region. The day-to-day interface between Masters and the naval/military forces is provided by UKMTO which talk to merchant ships and liaise directly with MSCHOA and the naval commanders at sea and ashore. UKMTO administers a Voluntary Reporting Scheme, under which merchant ships are encouraged to send regular updates on their position and intended movements. These reports are comprised of:
 - Initial Report;
 - Daily Reports; and
 - Final Report (upon departure from the high-risk area or arrival in port).



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2.2 UKMTO uses the emerging and relevant information from these reports to help the naval/military units maintain an accurate picture of shipping, thereby improving responsiveness to any incident. UKMTO is also a material source of information on the establishment and use of citadels.

2.3 The preferred method of communication with UKMTO for routine reporting is email to ukmto@eim.ae; Fax: +971-4-306-5710; or Telex: (51) 210473.

2.4 In case of emergency, the UKMTO may be reached by the 24-hour Duty Phone:
+971-50-552-3215

3. MARLO Information Exchange (The Maritime Liaison Office)

3.1 MARLO operates as a conduit for information exchange between the Combined Maritime Forces (CMF) and the commercial shipping community within the region.

3.2 Passage information should be provided to MARLO 48 hours prior to transiting through the GoA via:

email to marlo.bahrain@me.navy.mil
telephone +973-1785-3925, or
cell +973-1785-1395.

3.3 In case of emergency, the MARLO may be reached by the 24-hour Duty Phone:
+973-3940-1395

4. NATO Shipping Centre (NSC)

4.1 NSC provides the commercial link with NATO's Maritime Forces. The NSC is NATO's primary point of contact with the maritime community and is used by NATO as the tool for communicating and coordinating initiatives and efforts with other military entities (e.g., UKMTO, MSCHOA and MARLO) as well as directly with the maritime community.

Telephone: +44(0) 1923 956574

Fax: +44(0) 1923 956575

Email: info@shipping.nato.int

Website: www.shipping.nato.int

5. IMB (ICC International Maritime Bureau)

5.1 IMB is a specialized division of the International Chamber of Commerce (ICC) whose principal area of expertise is in the suppression of piracy through its PRC in Kuala Lumpur, Malaysia. It maintains a 24/7 watch system reporting pirate attacks in this area to the CMF



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and issuing warnings about hotspots. It also offers valuable advice as to what to do when pirates actually succeed in getting aboard.

5.2 It is recommended that Masters of vessels transiting the GoA include the IMB PRC as part of the reporting procedures by email to imbkl@icc-ccs.org.

5.3 In case of emergency, the IMB may be reached by the 24/7 Helpline Number: +60-3-2031-0014 or by the 24/7 Help Email: piracy@icc-ccs.org.

6. Contact: Any further information requests and inquiries concerning the subject for this notice Marine Notice should be directed to Palau International Ship Registry.

