

Effective ISPS Implementation with Existing Manning

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With the publication of the ISPS Code, the “Principles of Safe Manning”¹ are being challenged to consider how new shipboard security duties may contribute to crewmember fatigue and hazard the continued safe navigation of the world’s merchant fleet. That future Minimum Manning Certificates will be issued to take into account these security duties is good news for the crews that are accountable to uphold continued conformance with an ever-changing regulatory regime. But to call for increased manning now is premature, as the regulation is just only entering into its initial implementation phase. The impact of manning levels on implementation of ISPS and other regulations is a legitimate concern of the IMO, Administrations and ship managers. The drafters of ISPS were wise to acknowledge that the “Principles of Safe Manning” will require a security component and that this regulation – if it is to achieve its desired result – may be asking too much of many of the world’s already overworked shipboard personnel. Only time and experience will reveal whether additional people will be required onboard our ships. For the present, as ISPS is only just beginning its implementation onboard, ship managers are encouraged to implement security measures that call upon the strengths of their existing crews. ISPS can be implemented *effectively* onboard ships without adding names to the crew list provided that ship managers center their security measures to incorporate security awareness within existing shipboard work routines.

Effective Implementation or Collecting a Certificate

Effective implementation of a regulatory requirement can be a vastly different experience from one ship to another. Drawing upon the ISM Code as an example, we have all read of ships that continue to be detained by Port State authorities for glaring deficiencies in maintenance programs, poorly implemented emergency response procedures, etc. Does it continue to surprise any of us that these same ships are always in possession of a Safety Management Certificate issued by a leading IACS member? Certification is not an indication of effective ongoing implementation of regulatory compliance programs. Certification is limited in its examination to an isolated moment in

¹ IMO Resolution A 21/Res.890

time. Effective shipboard implementation must be based on implementing security measures that are adequate, proportional and achievable on an ongoing basis. Achievable security measures are those that can be performed by the crew as written in the security plan. The crew must be able to implement these measures continually and consistently. Overly prescriptive security measures or those that are simply not practicable by the crew will not be implemented effectively and lapses in implementation will occur. These lapses may jeopardize certification, or more seriously to us all, contribute to a security incident.

Ships are Only Part of the Answer

Shipboard implementation of security measures is a fractional part of a much larger maritime security equation that must place exponential importance on the functions of ports, Administrations and Contracting Governments. A ship is a thing that no matter how well it is manned and protected by its crew, is exceedingly vulnerable to terrorists, pirates and criminals in port and at sea. The critical nature of the support provided by parties who are external to the ship to thwart the ill intentions of other parties who are also external to the ship, *cannot be understated*. Or in the recent words of a shipping columnist, "Prudent onboard precautions cannot take the place of robust enforcement by states in the waters they are supposed to control."² It is unlikely that had the USS Cole or the tanker Limburg been provided with additional people onboard that the outcome of their respective disasters would have been averted. Nonetheless, the ship manager must acknowledge those areas where the ship's security measures can make a difference, and to focus his security plans on achievable requirements.

We must also be candid in our acknowledgement that once terrorists or criminals have boarded a ship, little if anything can or ought to be done with the exception of activating the Ship Security Alert System and contacting the appropriate authorities.

² Hughes, David "Piracy Continues to Rear its Ugly Head" *The Shipping Times*, January 21, 2004

Making a Difference with What we Have

Ship security measures must concentrate the efforts of a ship's crew on controlling access to the ship, and to display an abundantly visible security posture to those contemplating the ship as a target. This can be accomplished for most ships with existing crews provided that the security measures as documented within the ship's security plan are predicated on splicing security awareness within existing duties and routines required under other regulations.

It Starts with the Assessment

"The Ship Security Assessment should take into account all possible vulnerabilities, which may include...watchkeeping duties, number of ship's personnel, particularly with implications on crew fatigue, alertness and performance..."³

The Ship Security Assessment (SSA) is crucial in determining how existing security, cargo, navigation, engineering and watchstanding duties will contribute to provide a sound foundation for security duties specified under ISPS. The assessment must be conducted by personnel with an understanding and appreciation for the workings of a commercial ship and the limitations on duties and work schedules as imposed by regulations.

The SSA is the best opportunity to identify appropriate and proportional security measures for the ship, and should directly and greatly influence a ship's security plan. If the SSA is completed by knowledgeable personnel, the likelihood of determining effective and achievable security measures is greatly enhanced.

Achievable Security Measures

Consider a tanker crewed by 19 seafarers and operated with a 3-man cargo watch. Typically, both unlicensed crewmembers will be on deck during cargo operations, one near the onshore manifold and gangway, while the other patrols in search of problems about or near the ship. All cargo watchstanders, including the officer in the Control Room, carry UHF radios for instant communication. The crewmember on patrol will be

³ ISPS Code Part B 8.10.3

called upon periodically to check mooring lines, monitor valve indicators, etc., that are not necessarily in the vicinity of the cargo manifold or gangway. The ship's security assessment and subsequent plan should take these activities into consideration, including those limited, impromptu situations when the deck watch is called away from its proximity to the gangway. The ship's security measures should be flexible enough to permit the gangway to be left physically unattended for *brief* periods provided that responsible crewmembers, such as the watch officer, are able to effectively monitor it from other locations. The watch may be anywhere in the vicinity of the cargo block to provide sufficient control of the gangway. An additional crewmember can be called out to monitor the gangway in the event the deck watch is preoccupied with a planned activity. The security measures for this ship may call for fixing a gate at the top of the gangway or accommodation ladder with signage to instruct all visitors to wait for assistance by a crewmember as part of an effort to restrict immediate and unhindered access onboard.

At the other end of the spectrum, consider the access challenges posed by roll-on/roll-off vessels. For this example, take a car carrier crewed by 24 seafarers that routinely discharges cars via stern and side ramps. The ship's accommodation ladder, located in the vicinity of a cargo ramp, is continually manned during each port stay. Achievable security measures under ISPS might require the gangway watchstander to monitor both ramps and the gangway from a suitable vantage point. Likely, with up to three access points monitored for security reasons, additional personnel will be called upon to monitor and challenge individuals attempting to board via a cargo ramp. Can these additional personnel come from the ship's crew? Yes. Keep in mind the skills required to monitor these access points as described are not extensive and are required training under ISPS. The presence of these individuals alone may convince a would-be criminal to depart rather than risk detection.

Controlling accessibility to the ship is the single most important security measure for any crew. The role of ports in providing an effective primary barrier to against unauthorized

access to ships is essential, though the ship manager cannot assume that the ports' access control systems will be sufficient to reduce all risks to his ship.

Focusing on the Physical Aspects

Sufficient lighting, signage and other visible aspects (e.g. fire hoses rigged over the side and fully charged in hostile waters) of a ship's security measures will serve as a greater deterrent to those who would threaten the ship than placing more people onboard.

The investment by the ship owner to enhance lighting is a small capital expense with potentially greater returns on the investment than posting additional personnel onboard. Sufficient lighting is essential to the existing crew if they are to be expected to maintain sufficient security awareness during periods when the ship is potentially most vulnerable to attack.

Frequently coordinated security rounds of the Upper Deck provide a clearly visible message that communicates a systematic approach to security to anyone observing the ship. Drawing upon the previous example of the tanker conducting cargo operations, the unlicensed crewmember assigned to patrol the Upper Deck, Poop Deck and Foc'sle should be tasked to perform security rounds within his existing duties to monitor the safety of the cargo transfer. It isn't necessary to assign additional personnel to perform this task, and the visible cues afforded by the crewmember in making periodic checks of areas that surround the ship will indicate that the ship is maintaining an adequate situational awareness.

Devices that restrict direct and unhindered access to the ship and its restricted areas can be effective physical security measures that compliment existing crewing arrangements. Simple securing arrangements provided at the top of gangways and accommodation ladders to impede boarders are especially valuable during those brief periods when the gangway may not be physically attended.

The Most Precious Resource

Time to implement security measures with existing crews will pose challenges to every ship as initial implementation of ISPS progresses. Time to perform security duties

including watches, rounds, patrols and searches should be considered within existing schedules and routines as previously discussed. For certain ships that may have exceptional challenges on harmonizing security with existing watch schedules, now may be the right time to revisit alternative watch scheduling arrangements as a viable option.

The time that is anticipated to be necessary to oversee the continued and effective implementation of the ship's security plan is another matter that must be carefully considered as part of the SSA. The ship manager who appoints the Chief Mate as Ship Security Officer is warned that compounding the responsibilities of an officer who is already tasked to primarily ensure the safe, efficient and effective transfer of cargo may lead to problems and subsequent requests for additional personnel.

Bearing these concerns in mind, it is suggested that the Master is appointed Ship Security Officer since he does have the advantage of having more flexible time to allocate to continued implementation of security measures. The Master is also in a much better position to coordinate communications with the Company Security Officer as well as port personnel and officials of Contracting Governments and Administrations. The Master will naturally delegate responsibilities to other officers in order that the workload will be properly shared, though he will retain crucial control over effective implementation by providing the essential commitment from the top.

In addition, economies of time and effort will be realized by aligning certain duties of the Ship Security Officer with existing ISM Code obligations of the Master. For example, Master's Review, nonconformity reporting, and proposing modifications to documented requirements, are pre-existing obligations of the Master under ISM that have correlating requirements within ISPS.

Putting it Together Before July 1, 2004

ISPS can and should be effectively implemented onboard most ships with their existing crews. The ISPS implementation deadline is fast approaching and what is called for is an effective implementation program that focuses on splicing security awareness into existing shipboard duties.

The ship manager needs to appreciate the limitations and obligations of his ships to implement appropriate, proportional and achievable security measures. The ship's security assessment should directly and greatly influence a ship's security plan to document measures that are capable of being implemented by the existing crew on a continual basis.

Implementation of ISPS without increasing the number of people onboard is the right choice for an industry that still has much to learn about the workings of maritime security.

The respective roles of shipboard and shore-based personnel have been well-defined by the regulation, though until sufficient time has passed to learn how adequately those roles will actually be *performed*; it is ill-advised to consider providing more people onboard as a prerequisite for achieving effective ISPS implementation.