



COMPLEMENTING WHILE NOT COMPROMISING SAFETY SAFETY MANAGEMENT SYSTEMS, LLC

Over the coming months ship owners and managers will be facing some difficult decisions when evaluating their range of options for providing adequate security controls prior to the July 1, 2004 International Ship and Port Security (ISPS) Code certification deadline.



Besides reviewing their existing security arrangements from various perspectives, these parties must decide the particulars of their enhanced controls to meet requirements of the Code.

When reviewing options it will be critical that maritime security solutions are determined that do not compromise the safety of life at sea. Without the involvement of both shipboard and shore-based personnel in reviewing options and determining appropriate solutions, security programs in and of themselves may produce a greater threat to seafarers than the potential consequences of terrorists, stowaways and intruders combined.

Safety can be directly compromised by misinformed security procedures, devices and responsibilities. Security solutions or “mitigation strategies” must be appropriate to the level of threat and feasible to implement when judged on the basis of cost, commitment (e.g. level of effort required by personnel to implement) and comity with existing safe operational practices and emergency procedures.

Industry guidance provided within the Code, Marine Notices, Navigation Circulars, etc. calls for a careful review of potential compromises to safety when performing security assessments and documenting security plans. Compromises can only be determined only after methodically reviewing existing arrangements including procedures, responsibilities and duties, as well as safety equipment and plans.

Cautionary notes to be considered when determining the appropriate security solutions include:

- ⇒ How are work and rest periods currently managed within STCW and OPA 90 compliance arrangements? How might additional security duties (e.g. patrols, personnel checks and package inspections) conflict with compliance and possibly result in greater fatigue?
- ⇒ How might the safe execution of cargo operations be compromised were the Chief Officer to be assigned duties as Ship Security Officer?
- ⇒ How might physical securing arrangements (e.g. locking devices) compromise use of emergency and secondary escapes as well as accessibility during a fire?
- ⇒ How might security procedures compromise the proper execution of other procedures that are important to protect (e.g. watchstanding, navigation, engineering, cargo, etc.)?





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As the maritime industry moves to rapidly implement security systems within a compressed regulatory timeframe, it's a fitting time to revisit the International Safety Management (ISM) Code and to recall that that Code remains the centerpiece international maritime regulation that effectively forms the foundation for compliance with all other regulations, codes, standards and guidelines.

As safety of life at sea should remain the primary objective of ship owners and managers, it is essential now more than ever that regulatory compliance arrangements do not obscure the boundary between safe and unsafe operations.

Involve those onboard to determine compliance solutions that are appropriate and feasible to achieve security objectives while complementing safety.

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The recommendations provided in the previous paragraphs provide summarized guidance only and should not be construed to detail all mandatory considerations for ensuring complete regulatory compliance.