

**MEASURES TO ENHANCE MARITIME SECURITY: FACILITATION ASPECTS**

**Enhancement of security in co-operation with the World Customs Organization  
(WCO)**

**Submitted by BIMCO and the International Chamber of Shipping (ICS)**

**Executive summary:** This document comments on the timing of proposals to amend parts of the IMO Facilitation Convention and to develop interim guidance on procedures for maritime cargo security.

**Action to be taken:** Paragraph 5

**Related documents:** MSC 81/5/4, FAL 33/8/2

1 FAL 33/8/2 notes that MSC 81 will consider developing maritime cargo security measures consistent with the WCO Framework of Standards to Secure and Facilitate Global Trade. These measures may include amendments to SOLAS and recommendations for new provisions to be included in the FAL Convention, as well as consideration of a joint MSC / FAL circular on interim guidance, to take account of the length of time it might take for any amendments to IMO instruments to come into effect.

2 BIMCO and ICS, along with other industry organisations, have been closely involved in the development of the WCO Framework and therefore welcome this proposal in principle. It will be important to codify what will otherwise be only voluntary practices, and to ensure that compliance with ISPS Code requirements removes the need for additional security measures. In addition, it is essential to foster a global understanding of details such as pre-loading requirements, whilst avoiding any unnecessary duplication with the ISPS Code.

3 However, as noted in paragraph 19 of FAL 33/8/2, the WCO Framework's detailed implementation requirements, including those for cargo security, are being drawn up by the WCO and, at the time of writing, these requirements are still subject to consultation. As a matter of process, it would therefore appear advisable for IMO to wait for the full completion of the WCO work, in case it becomes appropriate for IMO to develop further measures, in addition to those already suggested in 33/8/2.

4 BIMCO and ICS would, therefore, respectfully recommend that it would be more timely for the Committee to defer any decision on possible amendments to the FAL Convention, and on any interim guidance on cargo security measures, until the WCO implementation requirements have been agreed and the Framework has been completely finalised.

**Action**

5 The Committee is invited to note the above information and to take action as appropriate.