

MEASURES TO ENHANCE MARITIME SECURITY – FACILITATION ASPECTS

Issues arising following the introduction of security data requirements

Submitted by the International Chamber of Shipping (ICS)

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| Executive Summary: | This paper comments on the IMO guidance on additional security related data required to be provided to administrations by ships intending to enter their ports. |
| Action to be taken: | See paragraph 6 |
| Related Documents: | MSC/Circ.1130, FAL 32/10 |

1. Paragraph 11.1 of FAL 32/10 reported that MSC 79 noted that FAL 31 had decided that

"facilitation aspects of a ship/port interface nature (especially those concerning maritime security in particular, and the recognised need for a balanced approach to security vis-à-vis facilitation of maritime traffic) should continue to be considered by the FAL Committee..."

2. MSC 79 agreed to a common international format for the submission of security related information to ports prior to arrival. However, ICS is disappointed that this information must still be sent in a separate message from non-security related data which is already routinely submitted, unnecessarily increasing the workload of ships' crews. In the interests of maritime safety and pollution prevention it is important that the Organization avoids the creation of unnecessary paperwork which distracts seafarers from the safe navigation of their ships.
3. Following MSC 79, MSC Circular 1130 of 14 December 2004 was issued which:
 - a) provides guidance as to a standard set of security related information which ships should provide to ports prior to their intended arrival;
 - b) states that this standard set need not prevent any contracting government from requiring any "supplementary" or "additional" data as a condition of port entry; and
 - c) recommends that, failing any other time frame being established by a government, the required security information should be provided not less than 24 hours before the intended arrival of the ship.
4. The data elements to be transmitted in respect of security-related information as detailed in MSC/Circ.1130 can be analysed into
 - a) those identical to data already appearing on the existing FAL forms e.g.
 - Name of Ship
 - Port of Registry

- Flag state
 - Type of ship
 - Gross tonnage
 - Port of Arrival
 - Brief description of the cargo on board
 - Name of ship's agent in the intended port of arrival
- together with a copy of the ship's dangerous goods manifest (FAL form 7), crew list (FAL form 5) and passenger list (FAL form 6)
- b) those which further identify the ship and are similar to data in the existing FAL forms (and which might be incorporated into one or more of them) e.g.
- IMO Number
 - Call sign
 - INMARSAT call numbers
 - Name of Company
 - Expected date and time of arrival
 - Primary purpose of call
 - Contact details of ship's agent in the intended port of arrival
 - Location of the ship at the time the report is made
 - List of last ten port calls or ship interfaces
 - Identification of the person providing the information
- c) security related details which do not parallel the data on the existing FAL forms e.g.
- Name and 24 hour contact details of the company security officer
 - Ship security certificate details
 - Ship security arrangements (existence of a ship security plan, current security level)
 - etc.

5. ICS appreciates the necessity for administrations to require the submission of advance information on the ship, its cargo and crew, the urgency with which the issue was addressed and the reasoning behind the requirements related to security. Nevertheless, we believe that both the concept and details of the FAL Convention have been insufficiently taken into account in the guidance.

6. A number of fundamental facilitation issues can be identified for possible attention by the Committee (in respect of both hard copy documents and data transmission) and on which we would welcome consideration:

- a) the possible alignment of individual data elements e.g.
- i) FAL Form 1 "Name & Address of Ship's agent" – Security requirements "Name and contact details of ship's agent"
 - ii) FAL Form 1 "Brief description of voyage" – Security requirements "Last ten port calls"
 - iii) FAL Form 1 "Nationality of ship" – Security requirements "flag state"
- b) the possibility for amending/redesigning the FAL forms to take into account security related data requirements e.g. IMO Number, Call sign/INMARSAT

- c) the possibility of developing a "single window" approach (Recommended Practice 1.2 of the FAL Convention calls on public authorities to "provide for any two or more such documents to be combined into one in any case in which this is practicable and in which an appreciable degree of facilitation would result.")
- d) the possibility for reducing duplication of data/document submissions (e.g. having submitted a dangerous goods list, crew list and passenger list before arrival, whether there is a need to submit them again on arrival)
- e) the possible need to amend the data requirements in Standard 2.1 of the FAL Convention.

Action

7. The Committee is invited to consider the data requirements related to security as listed in the guidance in the light of these comments and the provisions, standards, recommended practices and recommended formats in the FAL Convention, and consider further action.