

Dan Schwartz:

REPORT ON SECURITY REGULATIONS TO UNOLS COUNCIL

-- D. S. Schwartz, 2/12/04 --

All of the SOLAS vessels (this represents the USCG Inspected 'Global Class ' ships) met the Dec. 31, 2003 deadline for submitting Vessel Security Assessments and Vessel Security Plans to the USCG Headquarters, as required by the Maritime Transportation Security Act of 2002. These ships will be issued Documents of Security (DOS) showing their compliance, once their plans and assessments are reviewed. In any case, the Vessel Security Plans must go into effect in July of 2004.

Some of the UNOLS operators have also had to submit Facility Security Assessments and Plans, to cover their bases of operations.

The implications of these plans -- including cost of security enhancements, personnel time committed to managing the security plans, implementation of vessel access control systems, securing critical areas of our ships, training for crew and visitors and vendors, positive identification systems (badges, photos, etc.), baggage screening systems, overtime for crew on alongside security watches, hiring of security guard services, etc. -- are yet to be felt by the UNOLS operators.

By RVOC, the operators should be able to report on the first three months of operating in this "Brave New World." Once costs of compliance are learned, operators will probably add a line, into their proposal four-year budgets, titled "security costs," which will then be expressed in overall operational costs and day rates.

The Global Class ships and a number of the Ocean, Regional and Local Class ships have installed AIS (Automatic Identification System) transponders, in compliance with another section of the International Ship and Port Security Treaty and MTSA '02. These become mandatory for ships over 65 feet in length by July of 2004. The operators appreciate the support given by NSF in organizing a group purchase of this important security equipment.

UNOLS ship operators have been sending key shipboard and shore personnel through the "Company and Ship Security Officer" classes provided by MITAGS and the Pacific Maritime Institute. As each ship appoints a "Vessel Security Officer," as required in the Vessel Security Plans, more personnel will have to be sent to this course--and other courses will be provided to all crewmembers and technicians, as required by the 33CFR.

(The rest of you: feel free to add anything I may have missed.
Thanks, Dan)

--Reply to Al's email response--

Al is quite correct in re-emphasizing the very real economic impacts looming just over the horizon. I included that, perhaps in slightly

too subtle wording, in my report draft because we're approaching that time when NSF calls operators to try to beat our day rates down. That's an entirely appropriate exercise of due diligence on their part-but with so many yet-to-be-determined security costs facing us this year, it's hard to imagine that we can responsibly make major cuts to our charge rates.

Al Suchy:

Briefly on the WHOI status. Our facility was required to submit a Facility Plan which has been done. We were required to submit vessel plans for both our SOLAS ships and that has also been done all within the required deadlines. A formal vessel plan was not required to be submitted for Oceanus, but it is our intent to eventually take our existing procedures and consolidate them into a local plan for Oceanus.

I think the council should hear that the developments associated with the requirements that are being placed on us mean higher COSTS. As has been mentioned by my colleagues, it's hard to tell yet exactly how much more, but it is clear it will be more and in fact it already has been more. Non-compliance fines for not submitting vessel plans is at \$10K I have seen in news reports. There truly is no way around it. As you have seen from the input from Stan, Dan, and Tim this is a lot more effort (increased regular time and OT costs for the crews and in some cases contracted services) and a lot more equipment and materials (alarms, lights, fences, sensors, software, hardware, etc.). Coming at a time when the budgets are so constrained results in quite a squeeze.

Tim Askew:

Fortunately I (HBOI) was able to slip by on the requirement to have a Port Security Plan. I did however submit a letter to the Coast Guard prior to 31 Dec. 2003 letting them know that we reviewed all the criteria (requirements) and felt that we did not fall under any of them, although there is a fine line regarding the applicability requirements under Facility Security Rule 33CFR 105, depending on how you interpret the requirement and the way you answer the question's. I was also able to skirt around Vessel Security Rule 33CFR 104 for similar reasons i.e. not SOLAS, Uninspected, < 300 GRT, ETC. The US COAST GUARD did send an officer to our facility to verify that we in fact did not meet any of the requirements. However having said that we are working on a vessel security plan because when you go foreign they don't recognize the fact that the U.S. doesn't require it. I'm also sending Officers and myself to MITAGS in Baltimore for Security Officer Training.

On a similar subject which I sent out to RVOC a couple of weeks ago the U.S. Customs and Border Protection has a web site (WWW.CBP.GOV) that provides info on APIS (Advance Passenger Information for Sea carriers). This includes crew and scientists. I had trouble getting the web site but if you use Google and put in SEA APIS you can find it. In addition to APIS there is AES and AIS Automated Export System & Automated Import System This will pertain to operators that carry

container vans on there vessels. Especially if they put one on in the US and leave it in another country or pick one up somewhere and bring it back to the US. All this requires Software that has to be purchased or you have to have someone do it for you. I'm only scratching the surface on this subject and we were alerted to by our local Customs and Immigration Office to attend a mandatory meeting for all vessel operators in our area. Supposedly this all becomes effective on 5 March 2004. Are we having fun yet! I think this subject matter should be made known to Council ETAL because it is going to impact costs and inconvenience operators and scientists in a big way.

--Added information to above email--

I was off on the dates for APIS. The implementation date has not been established yet Customs said it will be in the near future. The AIS (I thought was for import is really AMS or Automated Manifest System) is 5 March 2004 and the AES is already being done on hard copy via the Shippers Export Declaration (SED) form and a new form was implemented in Jan. 2005. It is the AMS that has to be done electronically starting 5 March.

Stan Winslow:

Here is the status report on UH: The Kilo Moana is required to have a Ships Security Plan and we submitted one for her before the deadline. We also submitted one for KOK although the requirement for her to have one is not as clear. In addition, USCG Honolulu required us to submit a Facilities Security Plan which was also submitted before the 31 Dec 03 deadline. We have had no response back from the Coast Guard on whether our plans are accepted as written or will we have to make changes.

We have had four personnel attend a Security Officer School so far, and two others are scheduled.

There will be some additional costs depending on what security improvements we are required to implement. Examples are whether we will be required to replace the six ft fence around our 17 acres with an eight foot "security fence"; amount of training required for our guard service; additional lighting; backup power requirements; and what amount of security we are going to required on the ship when it is in port at the various security levels (24hr gangway watch, roving patrol, small boat waterside patrol, underwater checks of the docks, etc.)

The whole port Security issue is in a state of flux as the Coast Guard tries to figure out how to implement the homeland security requirements in the US (at the same time they are requiring us to do it) and individual nations implement their take on the international requirements. So far we are ahead of the curve, but who knows what tomorrow will bring.

Something to keep in mind is that our plans are required to be held as "sensitive information", so whatever information you may gather on the overall UNOLS vessels security status may at some point fall into that category.

Tom Althouse:

SIO Nimitz Marine Facility and our 2 SOLAS ships are required to meet all port and shipboard security regulations.

Our facility and ship plans were submitted by the 31 December deadline. They are under review and we have gotten one request for additional information on the facility security plan so we know it is being worked.

Daniel's summary is quite accurate regarding current status.

There will be impacts on science due to these requirements. At MARFAC positive identification of anyone proceeding to any of our ships will be required in accordance with the ISPS regulations. Additionally vehicles requiring entrance to the restricted area (pier, quay wall, shop) will be searched to varying degrees depending on MARSEC in effect. Some delays in getting to ship may occur.

We are implementing a phased increase in physical security now. Phase 1 will be installation of fences, access points and additional lighting to ensure identification of all personnel before they can enter the restricted area. This will also serve to control vehicle access and provide areas to search vehicles as required.

A second phase will provide a second layer of physical security that can be secured as MARSEC increases.

Personnel costs will increase also. During MARSEC 1, all personnel requesting access to the restricted area must be positively identified and reason for entering must be verified. This will require a guard during the day which we do not now have. Night access will be controlled by the existing guard force. This is an on going requirement.

During MARSEC 2 and 3 ISPS requires increased control both by the facility and the ships. This means that crew members will be required aboard ship while berthed at MARFAC with attendant increased personnel costs. In addition, additional temporary guard force personnel will be required to ensure facility security. It is not possible to predict these costs since they depend on the length of time MARSEC 2 or above is declared.

There will be costs associated with meeting ISPS requirements. In addition, especially initially, there will be some impact on science such as being required to provide greater advance notice when access to a ship is required, providing lists of personnel needing access, waiting for badges to be made up or for escorts and so forth. We are trying to minimize this inconvenience but it will take time to work out the process and science has to understand this.

A final area that is of importance is that of shipments to and from ships. Indications are that these will have to be more closely

controlled and information provided to the operators of all shipments enroute to a ship or facility. This is a very fuzzy area right now but captains cannot accept shipments if they don't know they are expected and what they contain.