Inspectie Leefomgeving en Transport
Ministerie van Infrastructuur en Milieu

Consolidated interpretations of Security Rules and Regulations by The Netherlands Shipping Inspectorate (NSI)

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3.0 → 3.1	Issue 031 (& 40): change of general number of DCC: 070 – 456 8555 Issue 030:

Content

Introduction

In response to September 11, 2001 regulations have been developed within IMO, regarding Maritime Security. These regulations, of which the main part can be found in the "International Ship & Port facility Security (ISPS) Code", have entered into force on July 1, 2004 and apply to passenger ships, cargo ships of 500 gross tonnage and upwards and mobile offshore drilling units, engaged on international voyages, and Port facilities serving such ships. The regulations are integrated into the SOLAS convention and contain requirements regarding, equipment, training and a quality management system for Security. Ships will have to comply to these regulations: without a certificate it will not be allowed to participate in international shipping.

The EC has approved Regulation (EC) Nr. 725/2004 which goes even further than the Security requirements developed by IMO. This EC regulation has taken effect as of July 1, 2004.

For further information, please visit our website and the websites of the Human Environment and Transport Inspectorate, the Ministry of Infrastructure and the Environment, the EC, the IMO and the Royal Association of Dutch Ship-owners (KVNR).

Actual contact information on security can be found on the website www.ilent.nl.

1. Supervision

The supervision of the Dutch flagged ships with regards to Security, is attributed to the Netherlands Shipping Inspectorate (NSI).
For questions and information, you can contact Mr J. Borsten or Mr. J. Schot at NSI. You can reach them via the general number: +31(0)88 489 00 00 (24 hrs), or via e-mail: security.ds@ilent.nl.

2. Interpretations

The ISPS code and other SOLAS amendments leave several issues up to the Administrations of member-states to decide. Furthermore some issues may not be entirely clear. In order to avoid confusion, NSI has compiled the following overview with interpretations of a number of these issues.

This list will be updated, if necessary, with new or revised points of view. Please check regularly for the latest version, via the website of NSI:
www.ilent.nl

To make things more clear and to align this document with NSI policy, a distinction has been made in the next chapters:
3. Procedures and other information
4. Ministerial Regulations for those matters which have already been formalized through other official documents
5. Policy rules
6. Interpretations

Since many companies have linked procedures etcetera, in their internal publications, to the numbering of the issues in this overview, we have chosen to retain the old numbering. Since we have removed several numbers which have been outdated for a long time, the remaining numbering may seem illogical to an inexperienced reader. We therefore ask you to always check which chapter you are in and which subject you are looking for. If you still have any questions, you can contact either NSI or your RSO or the Royal Association of Netherlands Ship-owners (KVNR).

3. Procedures and other information

Below issues give further information on procedures etcetera regarding the ISPS certification process.

Issue Nr. :	Subject:
005	**Identification of RSO Auditors**
RSO Auditors need to identify themselves when inspecting an SSP or when performing a verification on board as follows: • Valid passport or drivers license • Proof of employment (RSO ID-pass or a signed letter by employer) • Proof of competence (conform IACS PR 10) The latter 2 may be integrated into 1 document or ID-card. In case of doubt regarding the identity or qualification of a person claiming to be an RSO-auditor, the ship can contact the relevant RSO.	

Issue Nr. :	Subject:
007	**Application procedure ISSC**
• You can request an ISSC through the RSO of your choice • The SSP will be inspected by the RSO • The on board verification will be done by the RSO • As of August 1, 2006 ISSC's and interim ISSC's will be issued by the RSO	

Issue Nr. :	Subject:
010	**Security level**
• Unless otherwise notified, all ships registered in the Netherlands, should operate at security level 1 (See also MSC Circular 1132) • This security level is established by the minister of the Interior and Kingdom Relations (as per art 63 of the Ships Act 2004). • Changes in security level of ships registered in the Netherlands will be communicated by the Coast Guard Coordination Centre (KWC) at Den Helder to the relevant companies (preferably via CSO's, see also issue nr 59). They should then inform their ship(s) as applicable and confirm to KWC that the change has been implemented on board.	

Issue Nr. :	Subject:
027	**KVNR Framework for SSP's**
Using this guideline for drawing up the SSA and SSP does not guarantee issuance of an ISSC.	

Issue Nr. :	Subject:
033	**Using the Declaration of Security (DOS)**
• See IMO (MSC) Guidance, especially MSC circular 1132. • See for retention time of the DOS issue nr 19 in chapter 4: Ministerial Regulations	

Issue Nr. :	Subject:
035	**Deficiencies at verifications by RSO's**
When deficiencies are found during verification, the following procedure shall be	

adhered to:

- RSO reports to The Netherlands Shipping Inspectorate in accordance with Class Agreement (art 4.5).
- CSO and/or SSO shall take temporary alternative measures to maintain the required level of security.
- The alternative measures shall be approved by the RSO
- CSO and/ or SSO shall draw up action plan and time schedule to correct the deficiencies
- The action plan shall be approved by the RSO
- The CSO is ultimately responsible for the procedure

If the company does not abide by the action plan or time schedule without preceding consultation and agreement by the RSO, the ISSC may be withdrawn. As per August 1, 2006 the RSO is authorised to withdraw the ISSC.
The RSO reports to The Netherlands Shipping Inspectorate.

Issue Nr. :	Subject:
037	**Residence of the CSO**
It is permitted for a CSO to reside abroad	

Issue Nr. :	Subject:
048	**Application procedure Continuous Synopsis Record (CSR)**

Article 38.3 of the Dutch Shipping Act 2004: "On board a ship for which a Passenger Ship Safety Certificate, a Cargo Ship Certificate or, in case of a ship engaged on international voyages, a High-Speed Craft Certificate is required, a synopsis record containing, among other things, the ownership and registration data for the ship (Continuous Synopsis Record) is available which complies with regulation XI-1/5 of the SOLAS Convention."
This means all vessels to which the ISPS Code applies.

- The CSR application form is available through the website of the Human Environment and Transport Inspectorate (ILT): www.ilent.nl
- The application form can be completed in writing or digitally and shall be forwarded to NSI
- This form can also be used when the registry with the Netherlands ceases
- ILT shall issue the CSR's in the format as decided by the IMO
- A CSR may only be issued if an ISSC has also been issued for the same ship
- The original CSR-file shall be kept on board as long as the ship is in service

When a ship changes its registration to the Netherlands, and the previous flag state does not timely send the required documents, NSI shall issue a new CSR according to the instructions of IMO MSC resolution 198(80). This resolution adopts amendments to paragraph 8 and 9 of the annex to the existing IMO A Resolution A 959(23).

Issue Nr. :	Subject:
049	**Ships registered in the Netherlands Antilles or Aruba**
Please contact the Shipping Authorities in Curaçao, Aruba or Sint Maarten. (see http://www.ilent.nl/english/merchant_shipping/ship_owners_dutch_flag/security/contact_details_ship_security/	

Issue Nr. :	Subject:
055 (and 036)	**Ship Security Alert System (SSAS) and certification**
• Each ISPS-ship requires a working and certified Ship Security Alert System	

(SSAS).

- The Company is responsible for timely installing the SSAS. This entails, amongst others, reporting the installation of the SSAS to the RSO, for appropriate verification
- If the SSAS is not installed and approved when required, the ISSC may be revoked
- Relevant documents, describing the requirements for the SSAS, include:
  - ISPS Code
  - SOLAS XI-2, regulation 6
  - IMO resolution MSC.136(76) and MSC.147(77)
  - MSC Circulars 1072 and 1111 (MSC Circular 1073 can also be of interest)
- If any uncertainty or inconsistency exists regarding applicability of MSC Resolution 147(77) (Revised Recommendation on Performance Standards for a SSAS) and MSC Circular 1072 (Guidance on Provision of the SSAS), the latter prevails.

NL Approach inspection SSAS:
- The SSAS shall not be type approved or case approved by NSI
- At testing or auditing of the SSAS, this must be approved as per IACS Procedural Requirement nr 24 par 2.25, 4.5, 4.6, 6.1, 6.4, 6.5 en 7, en IACS Unified Interpretation SC 194, taking into account the following guidelines
- Regarding the Technical Approval:
  - If immediate survey is not possible for a SSAS connected to the GMDSS, then it has to be disconnected from the GMDSS, until the survey can take place
  - The radio surveyor shall not access the SSP, but limit the survey to the hardware
  - All SSAS equipment must comply with the IEC 60945 norm and the relevant ITU specifications with regards to radio communication
- During any survey of the SSAS, the SSO, or a qualified and authorized substitute, shall be present, to explain the operation of the SSAS
- The CSO is responsible for timely informing all recipients of test messages (including the Coast Guard Centre) and the appropriate confirmation of test message receipt
- If it is established that the SSAS does not comply with the requirements
  - RSO shall report this to NSI immediately
  - The Company shall contact NSI as soon as possible, to solve this problem
  - During a radio survey: The safety certificate (VC) will be endorsed if the GMDSS itself functions as required
- If an SSAS is found operational, which is not tested as described above:
  - If Self Contained: The SSO has to test the system on the spot and log a report thereof. Also it must be proven that the SSAS equipment complies with the IEC 60945 norm and relevant ITU specifications with regards to radio communication
  - In case of connection to GMDSS: an approved radio technician has to check the SSAS and report, before the RSO audit is finished.

Issue Nr. :	Subject:
057	**"Green Stamp" ships**

- Ships having a declaration based on IMO resolution A 791 (19), regarding the application of the International Convention on Tonnage Measurement of Ships, 1969 for existing ships with a gross tonnage < 500 ton, have **NOT** been exempt from the requirement of having an ISSC (MSC Circulaire 1157).
- The tonnage criterion to decide whether a ship should comply with the ISPS code is the GT measurement

Issue Nr. :	Subject:
059	**Contactdetails CSO for Changes in security Level:**

To be able at all times to reach the Dutch fleet with regards to a change in the security level, other threat warnings or further instructions regarding security, it is imperative that the Dutch Government has a complete overview of all relevant CSO's and their contact details. The following data are required:

- Name CSO (in case of more than one CSO for one company, then all names of CSO's)
- Office Telephone nr CSO('s)
- Mobile Telephone nr CSO('s) (24 hours)
- Home Telephone nr CSO('s)
- E-mail address CSO('s) (24 hours)
- Name and address of Company
- Telephone nr Company
- Fax nr Company
- Other relevant particulars (eg Alternative CSO('s))
- Name of relevant ship(s)
- Call sign of relevant ship(s)
- IMO number of relevant ship(s)

As of January 1, 2006, the NSI will administer these data. The Inspectorate will ensure availability of these data to the KWC. Modifications can be passed on by using the form 'Change contact details Company Security Officer's on the web-site of NSI:
http://www.ilent.nl/Images/ILT.143E.01%20-%20Change%20contact%20details%20company%20security%20officer%20(CSO)_tcm334-326714.pdf

If you did not supply your data yet, please do this ASAP. The data can be sent:
By mail:
Human Environment and Transport Inspectorate
PO Box 8634
3009 AP Rotterdam

Or by fax: +31-(0)70-456 4513
Or by e-mail: csodata@ilent.nl

PLEASE DO NOT FORGET TO NOTIFY THE INSPECTORATE OF CHANGES IN THESE DATA!

4. Ministerial Regulations

Below issues have been formalised through ministerial regulations which have been published in the "Staatscourant" (State Gazette). On each subject, reference is made to the relevant Ministerial Regulation.

Issue Nr. : **004 (&046)**	Subject: **EU regulation and Interpretations**
Ships registered in the Netherlands must comply with Regulation (EC) Nr 725/2004 (See also Art 31.2 of "Regeling Veiligheid Zeeschepen" as published in the "Staatscourant" of December 23rd, 2004, nr 248). Interpretations by NSI of the Regulation (EC) 725/2004, including the ISPS Code, and other SOLAS amendments prevail over deviating interpretations by an NSI-recognized RSO (for application on Dutch ships). In case of a dispute between company and RSO which cannot be arranged amongst one another, one can contact the Netherlands Shipping Inspectorate. (088 489 0000/24 uur). The finding of the RSO will be considered as an advice to the NSI.	

Issue Nr.: **014**	Subject: **Ship Security Officer (SSO) Certification**
Please refer to the Regulations on Ship Security Officer Certification dated 28 March 2008/No. HDJZ/SCH/2008-373, as published in the Government Gazette dated 3 April 2008, no. 65: Article 2: Before a certificate of proficiency for a ship security officer (SSO) can be issued, the following conditions must be met: a. the applicant must comply with Regulation VI/5, paragraph 1.1, of the appendix to the STCW Convention and b. the applicant has successfully concluded a course that is recognised by the Dutch Minister of Infrastructure and the Environment that complies with section A-VI/5, paragraphs 1- 4 of the STCW Code. Article 3, paragraph 1 Crew members that are appointed as an SSO must be in the possession of the certificate as referred to in Article 2. Non Dutch SSO's are deemed to be ship security officers according to Article 2, if the SSO has obtained his/her certificate in a country with which the Netherlands has concluded a bilateral agreement on mutual recognition of education and training. The countries with which the Netherlands has concluded a bilateral agreement can be found on the website: http://www.ilent.nl/Images/Landen%20met%20overeenkomst%20met%20Nederland_tcm334-326692.pdf This is monitored by the RSO's, based on both the ISPS Code and relevant IMO Guidelines (incl. MSC Circular 1097) for onboard verification and SSP approval. Certificate applications can be submitted to the bodies specified therein.	

Issue Nr. : **019** (&20 &51)	Subject: **Keeping of Records and DoS**

Storage period for records

All records as specified in paragraph 10.1 of Annex 2 of EC regulation 725/2004 (part A of the ISPS code), shall be kept on board for a minimum period of 3 years. See also Art 31.3 of "Regeling Veiligheid Zeeschepen" as published in the "Staatscourant" of December 23rd, 2004, nr 248.

Storage period for DoS

Declarations of Security (DoS), which have been made in the timeframe within which the last 10 calls at port facilities have taken place, must be kept on board during this timeframe, with a minimum of 3 months.

See also MSC circular 1132 (ao par 17)

See also Art 31.3 of "Regeling Veiligheid Zeeschepen" after the changes as published in the "Staatscourant" of februari 21, 2006, nr. 37, page 18.

Issue Nr. :	Subject:
031 (& 40)	**Ship Security alerts**

Ships registered in The Netherlands

The Ship Security Alert for ships registered in The Netherlands must be transmitted (possibly via the CSO), to the Coast Guard Centre of the Netherlands (KWC) in Den Helder:

- By telephone: + 31 (0)900 - 0111
- Via Fax at number   +31 (0)223 - 658 358 (24/7), OR
- Via Telex at number   71088 KUSTW NL (24/7)

KWC cannot guarantee fast and efficient follow up of Ship Security Alerts which are received via E-mail.

See also Art 31.1 of "Regeling Veiligheid Zeeschepen" as published in the "Staatscourant" of December 23rd, 2004, nr 248.

Ships with a broken SSAS:

Ships registered in the **Netherlands** without an SSAS can send Security Alerts via the following procedure:

- Ship informs the Company/ CSO (possibly via Dirkzwager)
- Company/ CSO (possibly via Dirkzwager) will contact the Departmental Coordination Centre for Crisis Management (DCC) of the Ministry of Infrastructure and the Environment.

Phonenumbers of the DCC:

- General nr: +31 (0)70 456 8555 (24 hrs)
- Emergency number: +31 (0)800 351 8700 (24 hrs)

National Point of Contact

See explanation of Art 31 of "Regeling Veiligheid Zeeschepen" as published in the "Staatscourant" of December 23rd, 2004, nr 248: The Coast Guard Centre at Den Helder has been appointed as *"National point of contact"*

Issue Nr. :	Subject:
052	**Recognised Security Organisations (RSO's)**

The Minister of Infrastructure and the Environment of the Netherlands has appointed the following (EU recognized) classification societies as Recognised Security Organisations (RSO) in ClassAgreement 2006:

- American Bureau of Shipping (ABS)
- Bureau Veritas (BV)
- Det Norske Veritas (DNV)
- Germanischer Lloyd (GL)

- Lloyds Register (LR)
- Nippon Kaiji Kyokai (ClassNK)
- Registro Italiano Navale (RINA)

See "Besluit erkende organisaties Schepenwet" as published in the "Staatscourant"

5. Policy rules

The issues in this chapter are the interpretations of The Netherlands en form part of the Dutch normenkader beteffende ISPS-certificering. See Easy Rules:
http://www.ilent.nl/onderwerpen/transport/easyrules/index.aspx
Zoek op Merchant shipping > Policy Rules > National Instruments > Beleidsregels voor de scheepvaart > 01 Policy Rule Safety Seagoing Vessels

Issue Nr. : **013**	Subject: **Amendments to the approval of SSP and/or Security equipment**
Also refer to Article 2.3 of the Policy Regulations on Marine Shipping. Amendments to approved procedures, SSPs and Security Equipment that influence a ship's security performance must be reported to the RSO before they are implemented. The RSO will decide what procedure is to be followed per each individual case based on the regulations of the Human Environment and Transport Inspectorate. http://www.ilent.nl/Images/Changes%20to%20Ship%20Security%20Plans1_tcm334-326710.pdf	

Issue Nr.: **15**	Subject: **Company Security Officer (CSO)**
Also refer to Article 2.4 of the Policy Rule on Marine Shipping. The CSO must possess the expertise and skills necessary to correctly perform (ISPS Code, Part A, Article 13.1) the tasks ensuing from part A, Article 11 of the ISPS Code. To this end, the CSO must at least be able to prove that he/she has concluded training in accordance with ISPS Code, Part B, Article 13.1.	

Issue Nr. : **030**	Subject: **Internal reviews/audits of SSP**
Also refer to Article 2.5 of the Policy Regulations on Marine Shipping. To comply with ISPS Code Part B of Art. 1.12 and 9.2.6, the SSP between two consecutive inspections or reinspections shall be assessed at least once before an interim ("intermediate") or "renewal" inspection. If drills or other experiences give cause to change the SSP, this shall be done as soon as possible, according to the existing procedure for changes to approved SSP's (issue 13) Actions and measures by companies, aimed at improving the observance and security awareness onboard their ships, are encouraged by NSI. The yearly performance of internal audits by the company (CSO) can be of assistance in this respect. Possibly, the Self Assessment Questionnaire as developed by the IMO and the EC, can be a useful tool for these audits. This IMO Circular (MSC.1/Circ.1217, INTE-RIM GUIDANCE ON VOLUNTARY SELF-ASSESSMENT BY COMPANIES AND COMPANY SECURITY OFFICERS (CSOs) FOR SHIP SECURITY) can be found via IMO-Docs op www.imo.org .	

Issue Nr. : **034**	Subject: **Frequency of searches of embarking persons**
Also refer to Article 2.7 of the Policy Regulations on Marine Shipping. The following minimal frequencies of searches have been approved by NSI:	

Level 1: The frequency of searches is to be determined prior to arrival in a harbour* according to either: (1) a risk analysis by the SSO or CSO, the determined frequency is to be noted down in the security records for each occurance. (2) a fixed frequency defined in the SSP (e.g. 1 per 10 persons boarding).
Level 2: 1 person out of 10 at random, with a minimum of 1 actual search per port of call
Level 3: All persons
The above is valid, subject to Solas XI-2, regulation 8. The latter always prevails.

Issue Nr. : **041**	Subject: **Certificates when registering existing ships in the Netherlands**

Also refer to Article 2.1 of the Policy Regulations on Marine Shipping.
If the company remains the same, the procedure will be as follows:
- The SSP must be approved by an NSI appointed RSO, taking into account the specific Dutch interpretations.
- If an RSO has recently approved an SSP on behalf of another flag state, this RSO could, in principle, suffice with only a limited check on specific NSI Interpretations.
- An on board verification must be held according to the instructions and interpretations issued by NSI. In principle this can consist of an earlier verification for another flag AND an extra verification limited to the specific NSI Interpretations.

If the above procedure is followed correctly, a long term ISSC can be issued (as from August 1, 2006 by the RSO). This applies to ships flagging in, with or without an ISSC from another flagstate.

If a new company takes control of the ship:
- A CSO must be appointed by the new company
- This CSO is responsible for all ISPS matters, including the performance of a new Security Assessment and the creation of a new SSP. If applicable, parts of the former SSP may be reused. This does not guarantee that the SSP will be approved.
- Basically the complete regular ISSC procedure must be followed.

If, due to lack of time, problems might arise regarding the issuance of an ISSC, the company can request an interim ISSC. If the demands as stated in article 19.4.2 of part A of the ISPS code are met, an interim ISSC can be issued by the RSO, based on article 19.4.1 of part A of the ISPS code, referring to the transfer of flag. This will allow the relevant company a maximum of 6 months to qualify for the regular ISSC.

Issue Nr. : **042**	Subject: **Certificates for ships newly delivered**

Also refer to Article 2.2 of the Policy Regulations on Marine Shipping.
Basically the complete regular ISSC procedure must be followed.
If, due to lack of time, problems might arise regarding the issuance of an ISSC, the company can request an interim ISSC. If the demands as stated in article 19.4.2 of part A of the ISPS code are met, an interim ISSC can be issued by the RSO, based on article 19.4.1 of part A of the ISPS code, referring to the delivery. This will allow the relevant company a maximum of 6 months to qualify for the regular ISSC.

Issue Nr. :	Subject:
056	**Access Control**

Also refer to Article 2.6 of the Policy Regulations on Marine Shipping.

- Access control is required under SOLAS security regulations (ISPS A 7.2.2)
- However, the ISPS code does not state that a gangway watch is mandatory

The agreement for the ships registered in the Netherlands is that there **needs to be access control**, but **not necessarily by a gangway watch**.
For example, access control may be done by a man on deck or on the bridge, or via camera's, as long as someone is <u>monitoring access</u> to the ship and <u>visitors are approached upon boarding the ship</u> to identify themselves and to enquire after the purpose of their visit.

The SSP should reflect the above and an RSO appointed by the Dutch government should only approve plans that conform to the above. If an RSO has approved plans that are not compliant with the ISPS code, this situation should be corrected immediately.

Some administrations have more stern demands. The CSO and SSO have to take this into account, when preparing the voyage.

Issue Nr. :	Subject:
058	**Shore based Contact point for follow up of SSAS alerts for <u>ships where the CSO is also the master</u>**

Also refer to Article 2.8 of the Policy Regulations on Marine Shipping.
This issue is only relevant for companies where the CSO is based on board the ship!!

- If the Coast Guard Centre (KWC) receives an alert via the Ship Security Alert System (SSAS), it will inform the Departmental Crisis Coordination Centre (DCC). The CSO will be contacted to gain relevant information and to check if there may have been a false alert. If the CSO is also the master on board of the ship concerned, this is not possible as authorities are not supposed to contact the ship directly after receipt of an SSAS alert (MSC Circular 1073, a.o. in art 2.4.2 of the Annex, regarding "Covert Alert").
- To be able to appropriately respond to SSAS alerts of ships where the CSO is also the master, there is a need for a shore based contact point.
- This can be the contact point as required by the registration laws and regulations, but also a third party (company or person). No party has exclusive rights in this respect
- There has to be a written agreement between the ship and the party acting as contact point, which specifies that the contact point is available at all times for assistance in case of a security alert. The contact point must be able to supply as much relevant information as possible regarding the ship involved, such as type of ship, cargo, position, crew, presence of dangerous goods etc, to the Dutch government.
- The shore based contact point will be mandatory as per the date that the SSAS becomes mandatory
- Contact details of the shore based contact point must be known by the KWC (Coast Guard Centre). The Human Environment and Transport Environment (NSI) must be informed about this, together with the CSO-data. See also is-

sue nr 59.
- For ships without a shore based contact point, the Dutch Government will assume that each SSAS-alert is a real emergency, and respond to the alert on that basis. It is therefore likely that inappropriate use of the SSAS will result in significant costs.

Issue Nr. :	Subject:
060	**Drills and Exercises**

Also refer to Article 2.9 of the Policy Regulations on Marine Shipping.

Drills
Are to be performed by the ship, as required by ISPS part A para 13.4 and part B para 13.6. The SSO is first line responsible for the execution of these drills.

Exercises:
ISPS exercises are different from drills, and have to be carried out, as per the requirements of ISPS part A para 13.5 and part B para 13.7, once a year with no more than 18 months between them.
The organisation is in principle company business (CSO), in line with the ISM system.
The purpose is to test the security-system of the company and to ensure the effective coordination and implementation of SSP's .
More than one company ship (if possible) but not all company ships have to be involved in a specific exercise.
However reports have to be sent to all company ships and the records have to be kept on board of all company ships. Deze uitkomsten dienen aan boord van ieder schip te worden besproken, waarbij een melding hiervan wordt gemaakt in het logboek.
Furthermore, necessary improvements identified through the exercise should be effectuated on all company ships.
Authorities may be involved in these exercises but are not obliged to participate
Nevertheless authorities are encouraged to carry out their own exercises
A CSO may participate in these governmental exercises and is in that case not obliged to organise a company exercise that year (ISPS part B, para 13.8).
However in these cases reports do have to be sent and recorded in a similar way as with company exercises
If a ship, when asked, is not able to provide its RSO or administration (at intermediate or renewal audits) with records of required exercises, the ISSC may be revoked.

If a ship, when asked, is not able to provide PSC officers with records of required exercises (Exercises & Drills), this will count as a security deficiency and can possibly lead to a detention.

6. Interpretations

Issue Nr. : **038**	Subject: **Interpretations and their application**
• Ships in possession of an approved SSP, have to establish adjustments to the SSP and/or the ship, which are necessary due to interpretations that were published after their SSP was approved, at the next intermediate or renewal verification. • An exception to this rule can exist, when NSI specifically mentions that the adjustments must be made immediately.	

Issue No.: : **061 (also see issue 33).**	Subject: **Using the Declaration of Security (DOS)**

DOS in general
A ship must comply with a request from a port facility to draw up a DOS. However, a port facility, or another ship (in the case of ship-to-ship contact), is not obliged to comply with a similar request from a ship, but only to confirm receipt of the request.
 	
In general terms, a DOS should only be drawn up if there is a justified, security-related reason for doing so in the case of a specific ship/port or ship-to-ship contact.
In any event, it is recommended to draw up a DOS:
• in the circumstances as specified in Article A/5.2 of the ISPS Code*;
• in all situations that are not covered by the SSP and/or the PFSP;
• if there is contact with a non-ISPS ship that transports hazardous substances.
 	
Contact between ISPS ships and Barges (inland waterway vessels)
A DOS is NOT compulsory within the scope of barges (bunkers, stores, waste disposal), so long as:
• the barge is in the possession of an International Ship Security Certificate (ISSC), or
• the barge is covered by a Port Facility Security Plan (PFSP), or
• the SSP of the ISPS ship procedures includes, in these cases, physical security measures (like monitoring the barge and escorting crew members from the barge if they are on board the ISPS ship) and these physical security measures are in fact implemented. It is recommended to make a record in the (security) logbook that the measures were implemented according to the SSP during this contact.
These principles apply to the loading/unloading of barges.
 	
If a DOS is compulsory, but no one on the barge is prepared to draw one up, then the ISPS ship should unilaterally draw up a DOS and establish the additional security measures. This may be required for inspection in the next port.
 	
* Article A/5.2 of the ISPS Code states that a ship can be requested to produce a DOS when:
   1. the ship is operating at a higher security level than the port facility or another ship it is interfacing with;
   2. there is an agreement on a Declaration of Security between Contracting	

Governments covering certain international voyages or specific ships on those voyages;
3. there has been a security threat or a security incident involving the ship or involving the port facility, as applicable;
4. the ship is at a port which is not required to have and implement an approved port facility security plan; or
5. the ship is conducting ship to ship activities with another ship not required to have and implement an approved ship security plan.

List of used abbreviations

Abbreviation	Meaning
ISSC	International Ship Security Certificate
ISPS	International Ship & Port Facility Security Code
NSI	Netherlands Shipping Inspectorate (part of ILT)
ILT	Human Environment and Transport Inspectorate *(official name for NSI)*
RSO	Recognized Security Organization
SSA	Ship Security Assessment
SSP	Ship Security Plan
SSAS	Ship Security Alert System
SSO	Ship Security Officer
CSO	Company Security Officer
CSR	Continuous Synopsis Record
AIS	Automatic Identification System
ASA	Alternative Security Agreement
DA	Designated Authority
DCC	Departmental Crisis Centre
EU	European Union
ILO	International Labour Organisation
IMO	International Maritime Organisation
MSC	Maritime Safety Committee (IMO)
PFSO	Port Facility Security Officer
PFSP	Port Facility Security Plan
PSO	Port Security Officer
KWC	Coast Guard Centre (Kustwacht Centrum) Den Helder
SOLAS	Safety of Life at Sea (IMO Convention for the... 1974)
ESA	Equivalent Security Arrangement
DoS	Declaration of Security
DGB	Directorate General of Freight Transport
KVNR	Royal Association of Dutch Ship-owners
GMDSS	Global Maritime Distress and Safety System
IEC	International Electro technical Commission
IACS	International Association of Classification Societies Ltd
ITU	International Telecommunication Union
STCW	Standards of Training, Certification and Watchkeeping