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CIRCULAR Maritime Security – San Marino flagged ships

Notice to: Ship Owners / Managers / Operators / Surveyors / Masters

C23047 | 22 August 2023

This circular is issued to advise the Maritime Authority of San Marino instructions for shipboard maritime security measures, as detailed in Policy Letter, [SMPL-2021-SEC-014](#). This Policy Letter, which entered into force on 11th October 2021 lays down instructions for:

- Ship Security Alert System (SSAS) messages
- Security levels
- Control and compliance measures
- Equivalent security arrangements
- Declaration of security
- Ship Security Plan
- Verifications and Certificate
- Test
- Security of assessments and plans

Key points are:

Ship Security Alert System (SSAS) messages:

The San Marino Maritime Authority, in accordance with SOLAS Regulation XI-2/6.2, has designated the relevant Company Security Officer (CSO) as the competent authority to receive ship-to-shore security alerts from the ship security alert system.

The Company of a ship flying the San Marino flag is to communicate to the Administration the name and contact details of the CSO who has been designated by the Company to be available at all times to receive and act upon the ship-to shore security alert. The Company may also designate a Deputy Company Security Officer (DCSO).

Changes to the name and contact details of the CSO/ DCSO, are to be formally communicated to the Administration and the relevant SSP amended and the changes approved, before coming into effect.

The Ship Security Plan (SSP), approved by the Recognised Security Organisation (RSO) on behalf of the Administration, is to identify the procedure (e.g., coded messages) allowing the CSO/DCSO to verify whether the alert is related to a true security incident, or it is a false alarm. If the CSO verifies that the ship-to-shore SSAS message is connected to a true security alert situation, they are to inform the Administration, and seek instructions.

Point of Contact of SMSR for ship security is:

Mob: +393668451298

E-mail: security@smsr.sm and
emanuele.derosa@caa-mna.sm.

On receiving notification of a ship security alert, the Administration immediately notifies the State(s) in the vicinity of which the ship is presently operating.

The CSO is to also inform the relevant RSO of the current situation if not otherwise established by the Administration. Both the Company and RSO concerned shall provide the required co-operation to the Administration.

Security levels:

The Administration sets security levels and advises the CSO/DCSO, who is to inform the ship. In the absence of specific information on the adoption of higher security levels ships are to enforce the minimum appropriate protective security measures provided by the SSP for Security Level 1 (SL1).

When security level 2 or 3 is communicated by the SMSR, the CSO/DCSO is to acknowledge receipt of the instructions on change of the security level and confirm to the SMSR that the change of level has been enacted onboard.

For ships in a port of another Contracting Government: when the Administration requests to set SL2 or SL3, the relevant CSO/DCSO responsible is to also inform that Contracting Government, as well as the ship.

Control and Compliance Measures

If during a Port State Control visit, non-compliance with SOLAS chapter XI-2 or part A of the ISPS Code is found, the CSO/DCSO is to inform the Administration and the RSO of the current situation. Both the Company and RSO are to provide all necessary cooperation to the Administration in order to rectify the non-compliance.

Equivalent security arrangement

Where a Company or an RSO are considering requesting any equivalent security arrangements (ESA), as per SOLAS regulation XI-2/12.1, the SMSR shall be informed at an early stage.

Declaration of Security

San Marino flagged ships are to seek completion of a DoS where:

- 1) the ship is at a port which is not required to have and implement an approved port facility security plan; and
- 2) the ship is conducting ship-to-ship activities with another ship not required to have and implement an approved ship security plan.

DoS are to be kept by the ship as minimum for the period covering the last 10 calls at port facilities.

Ship Security Plan

The RSO is to identify and propose to the SMSR which changes to an approved ship security plan, or to any security equipment specified in an approved plan, shall not be implemented unless the relevant amendments to the plan are approved.

Ships are to retain records of the activities listed in the ISPS Code section A/10.1., for at least the last 10 calls at port facilities.

Verifications and certificate

Renewal verifications are to be conducted, by the RSO, at intervals not exceeding five years, except where section 19.3 of the ISPS Code is applicable.

The Administration reserves the right to request the relevant RSO to conduct additional verifications where deemed necessary. The International Ship Security Certificate, issued by a RSO on behalf of the Administration is to have a validity not exceeding five years.

Test

The Administration reserves the right to test the completeness and efficiency of verifications conducted by RSOs, as well as the effectiveness of ship security plans which have been approved on its behalf

Security of assessments and plans

RSOs, Companies and ships are to have policies and procedures ensuring that appropriate measures are in place to avoid unauthorised disclosure of, or access to, security-sensitive material relating to ship security assessments and ship security plans. The Administration reserves the right to have access to any security assessment and security plan related with the security of ships flying the flag of the Republic of San Marino.

Act now

Ship Owners, Managers, Operators, Surveyors and vessel Masters should note the contents of the San Marino Policy Letter, and be guided accordingly.