

MARITIME SECURITY REGULATIONS

—WHO REALLY PAYS?

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Abstract The terrorist attacks of the past decade have resulted in significant changes within the maritime industry. The International Ship and Port Facility Security (ISPS) Code, the basis for national maritime security legislation, states that preventative measures will be instituted to prevent security incidents from affecting ships or port facilities. These security measures have placed a disproportionate burden on the vessel and the seafarer. Attacks on vessels continue to account for significant injuries, and numerous kidnappings. Mandated security duties have increased workloads, but not manning levels. The implementation of security measures has the potential to increase crew fatigue and thus negatively influence the safe and effective operation of the vessel. Security-oriented skills versus marine-related skills are now *de rigueur* and security considerations require front line personnel to deal with the resultant enforcement issues. Inconsistent port state control and port facility access control measures result in lengthy confinement to the vessel for the ship's crew, particularly for those from select countries. The imposed security regulations have increased the burden for ships' officers having a potential impact on ship operations. The financial, social, physical, and mental impact on the seafarer may be a cost that many are not prepared to pay.

Keywords Piracy; maritime security; safe manning; crew fatigue; security training; port state control measures; shore leave

0 Introduction

The events of September 11th, 2001(9/11) and the attacks on marine assets, such as the USS Cole and the VLCC Limburg, compelled the International Maritime Organization (IMO), through its Maritime Safety Committee (MSC) and Maritime Security Working Group (MSWG) to develop

procedures for the protection of ships and port facilities. These procedures are outlined in the International Ship and Port Facility Security (ISPS) Code, which came in to effect on July 1st, 2004.

The objective, as stated by the ISPS Code^[1] is the establishment of a cooperative framework whereby governments, administrations, agencies, and the shipping and the port industries work together to initiate procedures that protect ships and port facilities. It requires the establishment of roles and responsibilities for these stakeholders, and the provision of security assessments and security plans. Further, it insists that security measures be adequate and proportionate.

An analysis of these objectives suggests a cooperative approach by all stakeholders to mitigate security threats, with ships and port facilities being the primary beneficiaries. It infers a partnership of equals in which security measures will be shared on a proportionate basis. In reality the implementation of the ISPS Code and associated national maritime security legislation has resulted in the vessel absorbing a disproportional share of the security burden.

This paper will examine the effectiveness of these security regulations and the impact that they have had on seafarers.

1 Piracy and security incidents

SOLAS^[2] defines a security incident as any suspicious act threatening the security of a ship. The International Maritime Bureau (IMB)^[3] defines piracy as “An act of boarding or attempting to board any ship with the apparent intent to commit theft or any other crime and with the apparent intent or capability to use force in the furtherance of that act”. Although piracy constitutes only one form of security incident, statistics as gathered by IMB^[4], provide a yardstick to measure the effectiveness of the mandated security measures. A comparison of the yearly totals suggests a correlation between the introduction of ISPS and the decrease in piracy attacks. At the end of 2001 the number of such incidents stood at 335, and increased through 2002 (370), and 2003 (445). The numbers fell in 2004 (329), the first year of ISPS implementation, and continued to decrease in 2005 (276). These statistics suggest that ISPS implementation has had a significant and positive impact in reducing incidents of piracy.

However further analysis of the IMB 2005 Annual Report does reveals some disturbing trends. In 2005, twenty-three vessels were hijacked, the second highest number recorded, and the number of hostages taken (440) was the highest ever documented by IMB. At the end of 2005 more than 50 seafarers were still held captive, often with high ransom amounts demanded for their release. During the first quarter of 2006^[5] sixty-three crewmembers have been taken hostage. This is more than double the number for the same period in 2005, suggesting that incidents of hostage taking continue to rise.

The statistics indicate a decrease of attacks in areas such as the Straits of Malacca, and is attributed to increased law enforcement patrols, while a sharp increase in piracy attacks in other areas, such as the coast of Somalia, is attributed to the lack of law enforcement. The primary objective of ISPS is the protection of ships and port facilities. All stakeholders, including government agencies, must undertake cooperative security measures to ensure this protection. When such protection has not been provided, it is primarily the mariner who has endured the

consequences.

Despite the fact that the definition of port facility^[6] is inclusive of anchorages, waiting berths and approaches from seaward, the 2005 statistics reveal that 77.5% of the successful pirate attacks occurred while the vessel was berthed or at anchor, while only 22.9% occurred while the vessel was steaming. In some cases such facilities, due to the type of vessel serviced, may not be required to implement security arrangements as outlined in the ISPS guidelines. However these statistics indicate that these areas pose the greatest risk of attack and that the victims of the attack are vessels and their crew.

The IMB^[7] also notes incidents of attempted but unsuccessful attacks. Interestingly, 80.3% of these unsuccessful attacks occurred against vessels that were steaming. In fact, in 2005, there were only 45 reported cases of successful attacks where the vessel was steaming, with 57 cases of unsuccessful attacks. Conversely, there were 159 successful attacks on the vessel while at anchor or berthed, with only 14 unsuccessful attempts. This suggests that vessels underway have been far more successful in preventing such attacks, but while at anchor or berthed are far more susceptible to them. The IMB attributes the reduction in the number of piracy attacks to an increased security awareness supplemented with anti-piracy watches, both of which are requirements of the ship security plan. Crediting only the vessel for these successes may be simplistic as there are many factors involved. However, while underway the vessel is normally left to its own devices and evidence suggests that many of the security arrangements within the ship security plan are having some effect. Conversely, vessels at anchor or berthed, where security responsibilities are shared, have been more vulnerable.

A number of Conclusion are formulated from these statistics. While there may be some threats and even actual attacks on port facilities, statistically the main target is the vessel, cargo and crew. The vessel while underway has been reasonably successful in mitigating such attacks. While evidence shows that geographic area is a main predicator of piracy attacks, within those geographic areas the greatest risk occurs while the vessel is berthed or at anchor. The ISPS Code dictates that Governments, agencies, local administrations, and the industry at large ensure adequate and proportionate measures are in place to protect the ship and the facility. The other stakeholders need to shoulder more 'adequate and proportionate' responsibility in order to decrease the numbers of such security incidents in these areas. It appears that we are not yet meeting this goal and it is the vessel and crew who ultimately pay the price.

2 Safe manning

In 1999, the IMO, recognizing the principles of safe manning, adopted guidance to enable contracting governments establish minimum safe manning levels. In 2003, with the extra demands of the ISPS Code, an IMO resolution amended the guidance on safe manning. Resolution A.955 (23)^[8] defines safe manning as a function in numbers and experience of qualified seafarers for the safety and security of the vessel, crew, passengers, cargo and the marine environment. The amendments instruct vessels, companies, and contracting governments to consider additional tasks as dictated by ISPS when determining appropriate manning levels. It identifies administrative tasks, the coordination of security activities, and the assessment of security tasks, duties and responsibilities as additional criteria to be considered. Further, it instructs government

administrations to approve the manning level of a vessel only if, in addition to the other responsibilities, it adequately meets the requirements of the security regulations.

The ISPS Code^[9] lists a broad range of duties expected of crewmembers. It requires the vessel to implement security measures for access control, the control of movement of persons and their effects, identification and monitoring of restricted areas, monitoring of the deck and areas surrounding the vessel, and controlling the movement of ship stores and cargo. Additionally, the ship security officer (SSO) is required to undertake a number of specified duties. Crewmembers are tasked with numerous security duties including 24-hour gangway watches, roving patrols, and physical searches of persons, baggage, stores and cargo.

Most would argue that such measures are normally dictated through the routine practice of good seamanship, however prior to the introduction of the ISPS Code, vessels implemented security measures on an ad hoc basis. Crewmembers engaged in traditional duties such as cargo operations, ship maintenance, and deck watches, while concurrently performing security duties.

The security plan is now required to contain detailed security procedures. To ensure compliance, the plan is reviewed, approved, verified and certified by the appropriate government administration. Additionally, it is not uncommon for Port State Control (PSC) Officers, Company Security Officers (CSO), or even ship charterers to perform 'penetration tests' to ensure security personnel are conforming to the ship security plan.

The security regulations also require preparation for three different security levels that correspond to the identified levels of risk. An increase in the security level will require an increase in security duties, including the provision of additional personnel for access control, for roving patrols, and for other security monitoring duties, but without necessarily indicating where the additional human resource is to be obtained.

The maritime industry is competitive, with tremendous pressure to control cost but remain efficient. The guidance issued by the safe manning resolution has been used by contracting governments to draft the minimum manning levels as determined by and for that flag state. In 2004 the Chairman of the IMO Maritime Safety Committee^[10] suggested that some flag states may use reduced manning requirements in order to attract shipping companies to their registry. These reduced levels in conjunction with mandated security duties may make it impossible for the ship to conform to the intent of the safe manning resolution.

Competitive pressure has affected manning levels, as evidenced through statistics gathered by a number of agencies. The Paris MOU^[11], through a port state control inspection campaign in the fall of 2004, discovered that almost 50% of total deficiencies (2392) related to the Seafarer's Hours of Work and Manning of Ships Convention. While there is no evidence to show cause and effect with the new security regulations, these statistics do indicate a problem with conformance to safe manning guidance and it is logical to assume that the additional duties imposed by ISPS related regulations have only exacerbated the problem. The chairman of the IMO Maritime Safety Committee^[12], in a presentation to the National Shipping Industry 2004 Conference, suggests that it would make an interesting study to see whether manning levels have increased to reflect these additional responsibilities of the security regulations. The tone of his presentation suggests that they have not.

3 Fatigue

Fatigue, defined by the IMO^[13] as tiredness or sleepiness as a result of prolonged physical or mental work, extended periods of anxiety, exposure to harsh environments, or a lack of sleep, has also been a byproduct of ISPS implementation and contravention of the principle of safe manning. Without sufficient manning levels, it is common for crewmembers to work long hours and juggle multiple tasks with resultant physical and mental stresses.

The IMO Guideline on Fatigue^[14] affirms that the effect of fatigue (impaired performance and diminished alertness) influences everyone regardless of skill, knowledge or training. The resultant diminished capacity not only affects the ability to perform security duties, but also normal shipboard duties and consequently may affect the safety of crew and ship. The IMO^[15] indicates, “human error resulting from fatigue is now widely perceived as the cause of numerous marine casualties”. It also states “because shipping is a very technical and specialized industry, these negative effects are exponentially increased”. Unlike most port facilities that hire security personnel, the majority of vessels use the existing crew complement to perform security duties. The extra time allocation and responsibilities associated with these duties may cause fatigue, which may not only defeat the intent of security regulations through inadequate vigilance, but also have severe consequences affecting the safe navigation of the vessel.

4 Security skills and training

Security has always been a function of the maritime industry, however security regulations now demand that mariners, in addition to traditional seafaring skills, have specialized security training. The ISPS Code^[16] outlines 25 areas of training for the Ship Security Officer (SSO), including methodology of security assessments, instructional techniques, knowledge of security threats and patterns, recognition and detection of dangerous weapons, methods of physical searches, and crowd management. The SSO, normally a senior officer and burdened with a myriad of duties, is now responsible for security and training.

The ISPS Code^[17] also identifies 11 areas of specialized training for crewmembers having security duties plus other training requirements for crewmembers having no assigned security duties. Training will include recognition of dangerous weapons and of characteristics and behavioural patterns of persons likely to threaten ship security. The list of topics may suggest that mariners, to some degree, are now expected to take on the additional roles of security officer, enforcement officer, educator and psychologist, usually without commensurable compensation or training.

5 Port state control measures

Port State Control (PSC) measures ensure that vessels are in compliance with various regulations, codes and conventions, and strive to eliminate sub-standard shipping. The Tokyo MOU^[18], one of a number of port state control regimes, reveals that in 2005 it carried out 21,058 ship inspections, and discovered 14,421 deficiencies, resulting in 1,097 vessel detentions.

The North of England P&I Club^[19] notes that vessel detentions can have serious consequences,

including breach of charter parties and of carriage of goods contracts, and may affect a ship's ability to trade. It further notes that the number of ship detentions will likely increase as additional regulations come into effect.

As of July 1st, 2004, there has been increased emphasis to ensure that vessels conform to the new security regulations. Port facilities are also feeling the effects of these inspections. However, because the port facility and the PSC inspector are governed by the same national regulations and because there is frequent interaction between these parties, it is expected that facilities will be given more time and latitude to deal with deficiencies. Ships, however, may not be given the same leeway. Although the ISPS Code espouses safety and security for ship and crew, it appears that some administrations view the vessel as a threat rather than a target. Anecdotal evidence suggests that vessels are too frequently treated with suspicion, particularly when flying a foreign flag or employing a foreign crew. Some of the penalties for suspect vessels may include denial of port entry, detention, delay of departure or entry, and/or significant fines.

Different jurisdictions may have variation in the requirement, application, or administration of security regulations. It is a challenge for the SSO to remain current with the countless national security rules and regulations, particularly if visiting numerous countries and ports. Port facilities will normally deal with only one such jurisdiction.

Vessels, even when compliant with security regulations may be deemed a risk to port state security due to extenuating factors. The United States^[20], for example, uses a targeting matrix, which reviews five broad areas of risk. Only one deals directly with the vessel's implementation of the security plan. The history of the ship's management is also subject to review. A poor security record of any vessel operated by a company may elevate the risk associated with other vessels within that company, and subject them to more stringent PSC measures.

The matrix also reviews the security records of the flag state and the security record of the Recognized Security Organizations (RSO's). Therefore, a flag state or RSO having a number of security infractions above a certain threshold, will negatively impact vessels using that flag or RSO.

Under the matrix, the vessel's last five ports of call also impact perceived risk. If either of those ports is on a targeted list, then the vessel is deemed to be of higher risk. A United States Coast Guard (USCG) Port State Advisory^[21] identifies several states to be non-compliant. It informs vessels that have visited these countries that they will be subjected to a number of possible PSC measures, including boarding by USCG at sea, operational restrictions, or denial of entry to any US port. While vessels visit the ports of non-compliant countries, the advisory mandates actions including implementation of MARSEC Level 2 measures, and the execution of a Declaration of Security, or the vessel will be refused entry in the US. In addition, if permitted entry into the US, the vessel will be required to have all access points guarded by private, armed security personnel. This notwithstanding, vessels will be allowed entry only at the pleasure of the US government.

Although PSC measures are meant to deter or prevent security incidents within the port state, it is clear that any security weaknesses exhibited by other vessels within the company; the flag state of the vessel; the RSO's used; or the port state visited, may all impact how the vessel is treated. Unfortunately most of these factors are outside of the vessel's direct control, but the consequences

are negative and the ramifications severe.

6 Shore leave

The Seamen's Church Institute^[22] has described shore leave as, "an ancient and cherished seafarers' right that should not be denied except for compelling reasons". According to the International Transport Workers' Federation^[23] there are 1.25 million seafarers on vessels engaged on the international trade. With foreign seafarers working at sea on voyages that are frequently of several weeks duration and often working on ten to twelve month contracts^[24], the IMO, recognizing in part the need for freer movement of crewmembers and port services, ratified the Convention on Facilitation of International Maritime Traffic. This convention^[25] states that, unless there is a reason to refuse permission, foreign crewmembers shall be allowed ashore. The ISPS Code, recognizing the provisions of the Convention on Facilitation of International Traffic, urges contracting governments to take it into account when implementing security regulations. The IMO, through MSC/Circ. 1112, has also reminded administrations of the need to maintain the proper balance between the requirement for security and the protection of human rights. This Circular^[26] states, "a singular focus on the security of the port facility is contrary to the letter and spirit of the ISPS Code and will have serious consequences for the international maritime transportation system."

Of course it is the facility that is responsible for developing the port facility security plan. The ISPS Code^[27] outlines the procedure, content and format for such a plan. It directs port facilities to develop a plan that addresses, *inter alia*, procedures for shore leave, and access of visitors to the vessel, in addition to procedures for access control. Many facilities place a disproportionate weight on access control procedures and, having identified the vessel as a point of access to the facility, use severe measures that curtail the movement of crewmembers. At some facilities^[28] mariners are kept on the vessel under armed guard while at others they are refused access to the facility even for the purposes of making a phone call or reading the ship's draft. Anecdotal evidence^[29] also suggests that at some facilities, crewmembers are granted shore leave but are required to use facility approved 'ISPS transportation' to get from gangway to gate, often for exorbitant sums of money.

A port facility conducts a security assessment, and uses the information gathered to formulate the security plan. However it is the contracting government that is ultimately responsible for reviewing and approving this plan and as IMO^[30] directs, it is also their responsibility to ensure that facilities meet the requirements of the ISPS Code. Refusal of shore leave or unreasonable access control measures should not be allowed to become the norm. Administrations, through the verification process, can and must, determine if proposed measures meet the required standard.

Most international conventions recognize that ship's crews should not be required to obtain a visa for temporary shore leave. However some jurisdictions, most notably the United States, require mariners to have an individual visa in order to avail of shore leave or to join or depart the vessel in any of that country's ports. The Seamen's Church Institute^[31] identifies numerous logistical problems that make it difficult for seafarers to obtain such a visa. The cost of a visa, while low by western standards is also a prohibitive expense for many low wage earners.

The problem with shore leave, as espoused by PSC or the facility security officer, is the reliable verification of a seafarer's identification. The International Labour Organization (ILO)^[32] though ILO-185 has set standards for a seafarer identification document (SID) to ensure that such information is reliable, verifiable, and internationally acceptable. It is expected that widespread ratification and acceptance of such standards and the related documentation will at least partially alleviate this problem. However, such widespread ratification and acceptance is not yet the case.

7 Cost assessment

The Department of Homeland Security of the United States^[33], estimated the initial average cost of ISPS implementation for its 10,300 affected vessels to exceed \$21,000, and the average cost in subsequent years to exceed \$17,000, with the vessel operator normally expected to bear these costs.

Other stakeholders, notably governments, administrations, and agencies, have also experienced increases in security costs. In many cases security is, at least partially, their *raison d'être* and the additional costs are frequently covered through applicable government agencies or borne by the taxpayer.

Port facilities have also experienced an escalation in security costs. For public or quasi-public facilities, such costs are covered in a similar manner as previously noted for agencies. Other port facilities will pass security costs on to vessels using that facility. In some jurisdictions, such as Canada^[34], the government has provided significant funds to enhance the security of port facilities.

Vessels, because of implementation and operational demands and expenses that have been passed on by port facilities or government agencies, have had significant cost increases. In most jurisdictions there has been no funding mechanism to provide financial relief for the ship operator. Due to the competitive nature of the shipping industry, it is often difficult to pass on the security costs to the customer and consequently this affects the owners' bottom line.

8 Conclusion

The ISPS Code and resultant national security regulations have impacted the shipping industry. No doubt there have been positive results stemming from such regulations, however there is a need for stakeholders to institute further improvements.

Governments and associated agencies need to expend more effort in deploying resources to security 'hotspots'. Security regulations should be expanded so that they apply to more vessels and port facilities not currently covered by the ISPS Code.

The IMO must ensure that safe manning guidelines are not used by flag states in a negative manner, to attract shipping companies to their registry. Contracting governments should ensure that safe manning regulations properly reflect the requirements of the IMO guidance, while port state control officers must ensure adherence to the safe manning regulations. Such measures will also have a positive impact in terms of crew fatigue, and consequently result in the safer operation of vessels. Vessel operators, recognizing the requirements of the security regulations, must provide specialized security training, and additional physical and human resources as required.

Where possible port states should strive to implement security procedures that are uniform and consistent worldwide. Similarly, PSC procedures and expectations need to be applied in a more consistent manner. Vessels and crews need to be treated as part of the security solution instead of as the security problem.

Standards for a seafarer identification document (SID) need worldwide acceptance. Flag states must ensure that the port facility security plan includes procedures for shore leave, as required by the ISPS Code. With the implementation of a standardized SID, onerous visa requirements must be eliminated.

While implementation of the security regulations has created a significant financial cost for all stakeholders, it is the social, physical, and mental costs that are less easy to measure, and for which greater numbers of seafarers may be unwilling to pay.

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