

MTSA/ISPS POLICY ADVISORY COUNCIL

May 20, 2004

Issue/Discussion/Decision

Declarations of Security

22-04

FINAL

Issue: When is a DoS required?

Discussion: The Chemical Transportation Advisory Committee has asked many good questions regarding the requirements for DoS's and the definition of unmanned and interface.

Although unmanned barges are never required to complete DoS's, the facility or the tow boat must take the barge into consideration when performing security duties. Depending on who has operational control of that barge will dictate which of the Security Officers will need to provide security. If the towboat is tied to, or made up to the barge, it is considered to be in operational control of the barge. When that towboat/barge combination conducts a vessel-to-facility transfer or a vessel-to-vessel activity, a Declaration of Security would be required at MARSEC Level II. If the towboat drops off the barge at a facility, the facility takes operational control of that barge and must provide for its security. Because the facility has operational control of the barge in this situation, it is not considered a vessel to facility interface and does not require a DoS. Similarly, the transfer of an unmanned barge from one towboat to another is not considered a vessel to vessel activity and does not require a DoS.

Decision: Declarations of Security (DoS's) are addressed in 33 CFR 104.255 and 33 CFR 105.245. Detailed guidance is also provided in Change 1 to NVIC's 03-03 and 04-03. The attached DoS is supplied as further guidance.