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Bulletin 035 - Piracy and Armed Robbery

Notice to:
Shipowners, Operators, Masters and Officers, Flag State Inspectors and Recognised Organisations

1. References

- a) 1982 United Nations Convention on the Law of the Sea (UNCLOS)
- b) [MSC.1/Circ.1334](#) Guidance to shipowners and ship operators, shipmasters and crews on preventing and suppressing acts of piracy and armed robbery against ships
- c) [Form 147 Part 1 – Memorandum of Agreement](#)
- d) [Form 172 – Piracy and Armed Robbery Report Form](#)
- e) [Resolution A.917\(22\)](#) Guidelines for the onboard operational use of shipborne Automatic Identification Systems (AIS) as amended by Resolution A.956(23)
- f) [BMP5](#) Best Management Practices to Deter Piracy and Enhance Maritime Security in the Red Sea, Gulf of Aden, Indian Ocean and Arabian Sea
- g) [Regional Guide 2](#) to Counter Piracy and Armed Robbery against Ships in Asia (2022)
- h) [IMO Circular Letter No.3684](#)

2. Purpose

- 2.1 This Bulletin is to provide advice on the risks to vessels from piracy and armed robbery, and outlines the process for reporting attacks, both successful and unsuccessful, to the BMSR.

3. Application

- 3.1 This Bulletin applies to all Barbadian ships and yachts.

4. Western Indian Ocean and the Gulf of Aden

- 4.1 Attention is drawn to BMP5 Best Management Practices to Deter Piracy and Enhance Maritime Security in the Red Sea, Gulf of Aden, Indian Ocean and Arabian Sea.
- 4.2 The BMSR requires all Barbadian ships to register with the MSCHOA at least four days prior to entry into the vessel registration area. Vessel operators and masters should note that reporting is still required even if the vessel does not intend to enter the HRA. The registration form can be found on the MSCHOA website at www.mschoa.org. Users will be required to register an account in order to submit vessel reports.
- 4.3 The UK Maritime Trade Operations Office (UKMTO) operate a Voluntary Reporting Area (VRA). Vessels must submit an initial report to UKMTO and subsequent daily position reports whilst in the VRA. Routine position reports should not be sent to MSCHOA.
- 4.4 Companies are reminded that following the BMP and ensuring their vessels are registered and reporting correctly will assist naval forces to manage their resources efficiently to offer the best protection against piracy and ensure an effective response should military intervention be required.

- 4.5 The BMSR and military forces in the area use Long Range Identification and Tracking (LRIT) data to monitor compliance with the reporting schemes. However, the MSCHOA registration and UKMTO reporting schemes require more information about the ship and crew than can be obtained through LRIT reporting. Therefore, companies and masters of Barbadian vessels must continue to report in line with MSCHOA and UKMTO procedures, and not rely solely on LRIT transmissions.

5. West Africa including the Gulf of Guinea

- 5.1 The Maritime Domain Awareness for Trade – Gulf of Guinea (MDAT-GoG) is a voluntary reporting mechanism that has been established to share information regarding piracy incidents in the area.
- 5.2 Full details of the scheme are provided in IMO Circular Letter No.3684.
- 5.3 Barbadian vessels should participate in the scheme by reporting their positions whilst inside the voluntary reporting area, indicated on chart Q6114.
- 5.4 Reports can be made by telephone (+33 (0)2 98 22 88 88) or by email (watchkeepers@mdat-gog.org).

6. Southeast Asia and the South China Sea

- 6.1 Attention is drawn to the Regional Guide 2 to Counter Piracy and Armed Robbery against Ships in Asia (2022).
- 6.2 Piracy in the Asian region takes a different form to that of the African Regions. Rather than the violent kidnap and ransoming of crew, the perpetrators usually board to steal unsecured items, ships stores and engine parts. However, the number of incidents in this region is still higher than in other parts of the world, and the dangers posed to the crew and vessel must not be ignored.
- 6.3 A Voluntary Community Reporting (VCR) scheme is in operation in the area, as depicted in charts Q6112 and Q6113. All Barbadian ships operating within the VCR area are strongly encouraged to participate in the scheme. Further details can be found in Annex C of the Regional Guide 2.

7. Automatic Identification System (AIS) Policy

- 7.1 In accordance with Resolution A.917(22) Guidelines for the onboard operational use of shipborne Automatic Identification Systems (AIS) as amended by Resolution A.956(23), if the master believes that the continual operation of AIS might compromise the safety or security of his/her ship or where security incidents are imminent, the AIS may be switched off.
- 7.2 Unless it would further compromise the safety or security, if the ship is operating in a mandatory ship reporting system, the master should report this action and the reason for doing so to the competent authority.
- 7.3 When the AIS is switched off, this must always be recorded in the ship's logbook together with the reason for doing so, and the master should restart the AIS as soon as possible after the source of danger has disappeared. The ship should routinely transmit its position to the shipping company at given intervals, thereby giving the shipping company a first notice that something is amiss if the transmissions are interrupted.

- 7.4 **When an attack is expected, or suspicious activity is detected, the AIS should be switched on as soon as possible to enable security forces to locate the vessel.**

8. Long Range Identification & Tracking (LRIT) Policy

- 8.1 The LRIT equipment must not be switched off whilst the vessel is transiting or in the vicinity of a High-Risk Area.
- 8.2 Should it be necessary to switch off the LRIT equipment, the BMSR must be informed before doing so by email to registry@barbadosmaritime.com

9. Reporting of Piracy or Armed Robbery Incidents

- 9.1 The BMSR considers it vital that all attacks, both successful and unsuccessful, are reported to the nearest RCC (or regional piracy focal point where applicable), to the BMSR, and to the IMB Piracy Reporting Centre.
- 9.2 The BMSR reports all piracy and armed robbery attacks on Barbadian ships to the IMO for distribution in its monthly piracy reports. Form 172 – Piracy and Armed Robbery Report Form should be completed by the master or company to ensure all necessary data is submitted.
- 9.3 All reports are to be made as soon as possible, to enable necessary action to be taken.

10. Use of privately contracted armed security personnel

- 10.1 Barbadian ships can and should take measures to protect themselves from pirates and armed robbers and masters are encouraged to follow the recommendations in MSC.1/Circ.1334 Guidance to shipowners and ship operators, shipmasters and crews on preventing and suppressing acts of piracy and armed robbery against ships.
- 10.2 For legal and safety reasons, firearms should not be carried or used by seafarers for personal protection or for the protection of a ship. Seafarers are civilians, and the presence of firearms on board may encourage attackers to carry their own firearms or other weapons and escalate the situation further.
- 10.3 The BMSR permits the use of privately contracted armed security personnel, subject to approval by the BMSR Technical Department.
- 10.4 The BMSR has set five rules for engagement that must be followed by all armed security personnel on board Barbadian ships.
- i) Visual demonstration that the ship is under security guard protection;
 - ii) Audible warning to the sea going threat not to approach the vessel, inside 500m range;
 - iii) Warning shot to deter any further approach towards the vessel from the sea going threat, inside 200m range;
 - iv) Engage the vessel with minimal force to dissuade its continued approach, inside 100m range;
 - v) Use of deadly force is sanctioned only where armed insurgents have boarded the ship and there is clear and immediate danger to those persons onboard and the ship.

10.5 The requirements for flag state approval to carry armed guards are:

- i) Form 147 Part 1 – Memorandum of Agreement has been signed as accepted by BMSR and returned to the operator;
- ii) The BMSR Rules of Engagement, detailed in paragraph 10.4, have been agreed to by the security company;
- iii) The boarding security personnel shall be under the command of a Team Leader;
- iv) The Team Leader will be under the command of the vessel's Master;
- v) All weapons boarded shall be under the control of the employees of the security company only, and that no unauthorized contact with the weapons will be allowed;
- vi) The security company will provide all clearances etc. required for embarking and disembarking armed personnel on and off the vessel by the respective port authorities;
- vii) The security company shall sign their agreement to comply with the BMSR Rules of Engagement, as detailed in paragraph 10.4;
- viii) The Master shall follow all current practices for reducing the risk of unauthorised boarding, including the registering of the ship and its transit with UKMTO and MSCHOA;
- ix) The Master will consider suggestions from the Team Leader for the further reduction of risk onboard his/her vessel.

11. Further sources of advice and information

11.1 The Maritime Security Centre – Horn of Africa (MSCHOA)

- i) Website: <https://www.mschoa.org/>
- ii) Telephone: 0033 (0) 298 220 220 / 0033 (0) 298 220 170
- iii) Fax: 0033 (0) 298 220 171
- iv) Email: postmaster@mschoa.org

11.2 ReCAAP Information Sharing Centre (ReCAAP ISC)

- i) Website: <https://www.recaap.org/>
- ii) Telephone: +65 6376 3063
- iii) Fax: +65 6376 3066

11.3 United Kingdom Maritime Trade Operations (UMKTO)

- i) Website: <https://www.ukmto.org/>
- ii) Telephone: +44 (0) 2392 222060
- iii) Email: info@ukmto.org

11.4 Maritime Domain Awareness for Trade – Gulf of Guinea (MDAT-GoG)

- i) Website: <https://gog-mdat.org>
- ii) Telephone: +33 2 98 22 88 88 (emergency)
- iii) Telephone: +33 2 98 22 13 02 (exercise)
- iv) Email: watchkeepers@mdat-gog.org

11.5 BMSR

- i) Website: <https://barbadosmaritime.org/>
- ii) Telephone: +44 (0)207 636 5739
- iii) Emergency 24hr phone: +44 (0) 7985 498 475
- iv) Email: ops@barbadosmaritime.com

Revision History

Version	Description of Revision
1.0	First Issue