

VESSEL SECURITY PLANS
FREQUENTLY ASKED QUESTIONS

Vessel Security Plans

1. Can the MSC provide expedited reviews for Vessel Security Plans (VSP) and Piracy Annexes (PA)? **The USCG Marine Safety Center Vessel Security Division receives a multitude of requests for expedited review each week. We can't review your plan prior to plans from other members of industry without proper justification, in order to be fair to all submitters.**

As per 33 CFR 104.410(b), a VSP/PA must be submitted at least 60 days prior to beginning operations under this new VSP/PA. This 60 day period, on average, is more than enough time for the MSC to review and approve a VSP/PA. An expedited review and approval request must provide justification that explains why the VSP/PA was not sent to the MSC at least 60 days prior to beginning operations under this new VSP/PA.

As per 33 CFR 104.415(a)(2), a proposed amendment to your VSP/PA must be submitted at least 30 days before the amendment is to take effect unless the MSC allows a shorter period. This 30 day period, on average, is more than enough time for the MSC to review and approve a VSP/PA amendment. An expedited review and approval request must provide justification that explains why the amendment was not sent to the MSC at least 30 days before the amendment is to take effect.

Your request and justification will be sent to the Vessel Security Division Chief for consideration as soon as it is received.

2. Can the MSC provide expedited reviews for New and Amended ASP's? **An approval letter from us isn't required for operation with an ASP, because the ASP is already approved. The letters that we send to companies operating with an ASP are acknowledgement letters. To operate with an ASP a copy of the letter you sent us, a copy of the ASP, and a copy of the vessel specific security assessment report generated in accordance with the ASP must be kept on board. The acknowledgement letter we send is not required to be onboard the vessel.**
3. I am submitting a VSP/PA for 5 year renewal. Do I have to resubmit my Vessel Security Assessment Report and SSAS Annex also? **Yes a current VSA Report/Piracy Assessment and SSAS Annex should be submitted with your VSP/PA.**
4. Can I submit my VSP, SSAS Annex and Piracy Annex as one submission? **Yes, however, we do request that your Piracy Annex and Assessment(s) be submitted as separate files from the VSP & SSAS Annex. A Piracy Annex review and approval will be provided separately from the VSP & SSAS Annex review and approval.**

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5. I just recently received VSP/PA amendment approval letter. Is my plan approved for five years from this amendment approval date? **No, a plan that is approved by MSC is valid for five years from the date of its original approval. It is not from the date of any subsequent amendment approvals.**
6. I have an ASP, what is the expiration for my ASP? **As long as membership is maintained by the owner/operator their MSC ASP Letter of Acknowledgement will not expire.**
7. Does the MSC issue Continue to Operate (CTO) letters? **MSC does not issue CTO letters.**
8. Which foreign vessels are required to obtain an approved VSP prior to operating in U.S. waters? **Please see 33 CFR 104.105 for applicability.**
9. I'm submitting an American Waterway Operators (AWO) or Offshore Marine Services Association (OMSA) International VSP what do I need to submit? **Submitter should provide the latest version of the International VSP, Appendix – Company and Vessel Contact Information as well as the SSAS Annex if applicable. .**
10. Does my vessel require a SSAS? **See NVIC 04-03 for all guidance regarding a SSAS Annex.**
11. I'm amending my VSP/PA. Can I email only the pages that that have be changed or revised? **Yes, as long as there is no change in the formatting, or page numbering of the VSP/PA.**
12. Where can I obtain the latest MARSEC Directive that outline screening performance standards and Piracy Annexes? **MARSEC Directives are controlled documents and available on a “need to know basis” and available at the local Captain of the Port (COTP).**
13. Do I need a copy of the DoS Form in my VSP? **Yes. A DoS must include the information in the ISPS Code, part B, Appendix1.**
14. Where do I send my annual audit as required by 33 CFR 104.235((b)(8)? **MSC does not require a copy of the audit.**