

Piracy and Armed Robbery Against Ships

Notice to Ship Owners, Managers, Masters, Approved Nautical Inspectors, Recognised Organisations and surveyors

This Notice supersedes BMA Information Bulletin Nos.119 and 181

1. Purpose

- 1.1. This Marine Notice (MN) provides advice on the risks to vessels from piracy and armed robbery.
- 1.2. This Notice should be read in conjunction with BMA [Marine Notice 47](#), [Marine Notice 72](#); Anti-Piracy Planning charts¹; IMO Assembly Resolutions A.1044(27) & A.1069(28); IMO Circulars MSC.1/Circ.1302, MSC.1/Circ.1332, MSC.1/Circ.1333/Rev.1, MSC.1/Circ.1334, MSC.1/Circ.1390, MSC.1/Circ.1405 Rev.2, MSC.1/Circ.1406 Rev.3, MSC.1/Circ.1506, MSC.1/Circ.1585, MSC.1/Circ.1601/Rev.1, SN.1/Circ.281, and IMO Circular Letter Nos. 3606 & 3684 and any subsequent amendments.

2. Application

- 2.1. This Notice applies to all Bahamian ships.

3. Red Sea, Gulf of Aden, Arabian Sea and Indian Ocean covered by Planning Chart Q6099¹

- 3.1. Companies² will be aware that there have been few recent attacks and the boundaries of the High Risk Area (HRA)³ have been amended to reflect the improved situation. However, the risk of attacks cannot be discounted. Guidance issued by Maritime Security Centre Indian Ocean (MSCIO) and other bodies should be regularly consulted, and emergency plans updated as necessary.

¹ <http://www.ukho.gov.uk/ProductsandServices/MaritimeSafety/Pages/SRIM.aspx>

² The "Company" is the entity responsible for the management of the ship in accordance with the ISM Code. For ships which the ISM Code is not applicable, the Company is the Managing Owner in accordance with Section 52 of the Bahamas Merchant Shipping Act.

³ A High Risk Area (HRA) is an industry defined area within the VRA where it is considered that a higher risk of attack exists, and additional security requirements may be necessary. The HRA is outlined on maritime security chart Q6099 (Source: [BMP5](#)).

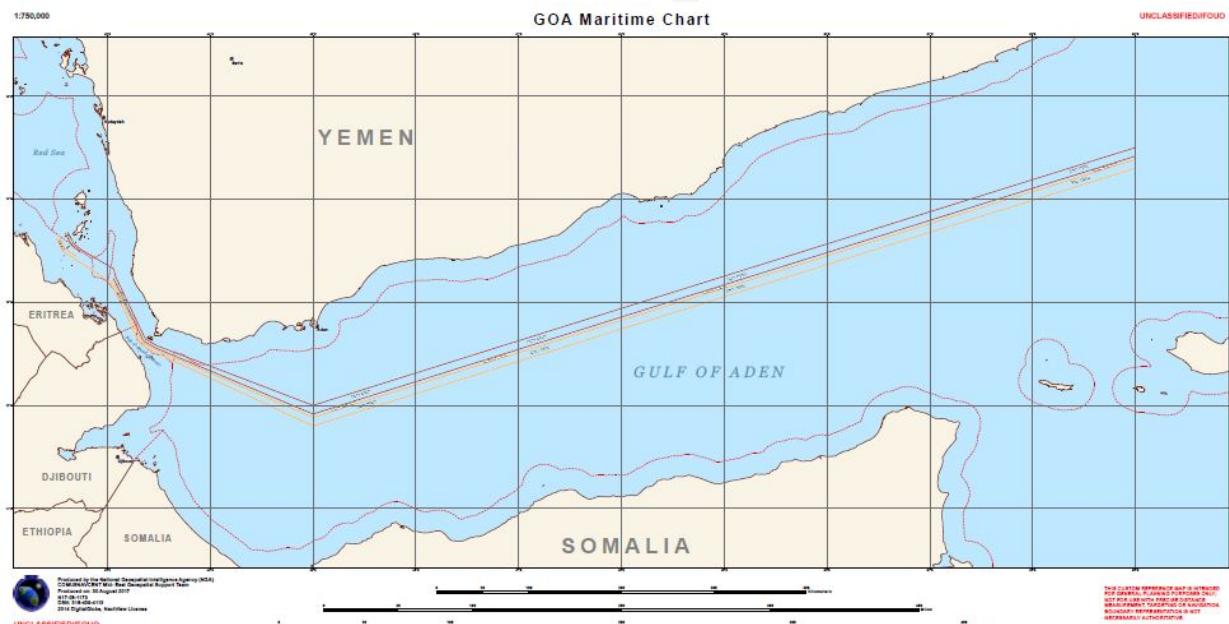
- 3.2. The Bahamas Maritime Authority (BMA) requires that all Bahamian ships submit an initial report to MSCIO before entering the VRA. It is important to note that the MSCIO vessel voluntary reporting area (VRA) is covered under the security charts:
<https://www.ms cio.eu/documents/71/maritime-security-chart.pdf> and
<https://www.ms cio.eu/documents/72/maritime-security-chart-2.pdf>. All vessel movements must be sent to MSCIO.
- 3.3. The required reports are found on the MSCIO website at www.ms cio.eu. UKMTO Dubai can also be contacted for advice at the addresses given at the end of this document.
- 3.4. It should be noted that the MSCIO initial report includes a provision to advise the military forces of the presence of firearms on board. It is vital that the military forces understand what they may be faced with in the event of an intervention. Therefore, Bahamian ships **MUST** communicate this information to them.
- 3.5. Companies are reminded that the correct procedure for ships is to provide an initial report, followed by daily position reports and a final report to the MSCIO. If the Company's procedures require reporting to other bodies such as UKTMO, that shall be done in addition to the MSCIO reports.
- 3.6. To ensure that Bahamian ships are implementing Best Management Practice ([BMP 5](#)), the BMA and the military forces use Long Range Identification and Tracking (LRIT) data to monitor compliance with the reporting scheme and verification of the ship's position.
- 3.7. LRIT data for the purposes of counter-piracy activities is transmitted automatically to nominated military recipients through the IMO data distribution facility.
- 3.8. Companies are reminded that following the BMP in respect of vessel reporting will assist naval forces in efficiently targeting warning messages to ships and deploying their resources to provide the best possible protection against hijacking or post-attack intervention.
- 3.9. It should be noted that the MSCIO reporting regimes require more information about the ship and crew than can be provided by the LRIT system data. For this reason, ships must continue to provide daily reports as a critical part of the ship's anti-piracy strategy.
- 3.10. The BMA is provided with a daily report of Bahamian ships operating inside the area of risk and will communicate with the CSO of any vessel which is identified to have failed to follow the reporting regime with MSCIO.

3.11. ***In addition to the above, for ships transiting the Red Sea, the following shall be taken into account:***

- 3.11.1. In November 2023, the Bahamas-flagged car carrier GALAXY LEADER was boarded in the Red Sea by helicopter and captured by armed forces, reportedly connected to the Houthis. The crew was repatriated after over 14 months in captivity, and the ship was eventually declared a constructive total loss.
- 3.11.2. When transits of the Red Sea are necessary, Best Management Practices (BMP) should be followed. The current version of BMP is [BMP 5](#). This version includes details of self-protection measures and a feedback request to masters on the effectiveness of the anti-piracy actions taken by the vessel.
- 3.11.3. Recognising the current risk on transiting the Red Sea, the Company Security Officer / Ship Security Officer may consider implementing ISPS Security Level 3 measures, as outlined in the Ship Security Plan, during such transits.
- 3.11.4. A ship-specific risk assessment should be conducted and aligned with the prevailing circumstances and all crew members sufficiently briefed before the transit.
- 3.11.5. The vessel's course should be charted to keep maximum distance from the Yemeni Coast. Fire and security drills should be conducted, and the Citadel (if present) prepared for use.
- 3.11.6. Most attacks have happened during daylight hours, so consideration should be given to conducting the passage during darkness.
- 3.11.7. In the event that a Bahamian ship operating in the Red Sea region comes under attack, the BMA should be advised as soon as possible with information included in section 10 of this Notice.
- 3.11.8. Merchant vessels can receive a regional maritime security brief from UKMTO (Dubai) by telephone or online. To contact the UKMTO Dubai office, please email: dubaioic@ukmto.org. Please note that any emails received between 13:00UTC on Friday afternoon and 04:00UTC on Monday morning may not be actioned before 04:00UTC on Monday. For urgent and short notice briefing requirements that fall outside of these times, Masters should contact the Duty UKMTO Officer on: +971 50 189 8389 to arrange.
- 3.11.9. Maintaining vigilance and reporting to MSCIO are fundamental but only part of what prudent owners should do. It is clearly necessary for adequate training and regular practice to be given to crews to enable them to respond effectively when under attack or threat. Low speed and low freeboard remain factors that significantly increase the

vulnerability of ships.

- 3.11.10. Nothing in BMP detracts from the Master's overriding authority and responsibility to protect their crew, ship and cargo.
- 3.11.11. On completion of the transit, compensatory rest for those involved in extra watchkeeping duties should be ensured after crossing 50°E.
- 3.11.12. It is recommended that ships use the Maritime Security Transit Corridor (MSTC) to benefit from the military presence and surveillance. The MSTC is a military established corridor upon which naval forces focus their presence and surveillance efforts. The MSTC is shown on maritime security chart Q6099 and the figure below and consists of:
 - a) The Internationally Recommended Transit Corridor (IRTC). The IRTC is not a Traffic Separation Scheme (TSS) but an established transit corridor in the Gulf of Aden where naval forces focus their counter piracy patrols. Within the IRTC, group transits and national convoys may be offered.
 - b) The Bab Al Mandeb (BAM) TSS and the TSS West of the Hanish Islands.
 - c) A two-way route directly connecting the IRTC and the BAM TSS.



4. Gulf of Oman, Strait of Hormuz and Persian Gulf

- 4.1. All ships are permitted to implement additional security measures for the duration of their transit in the region without actually increasing the security level, except where an increased security level is required by the coastal State(s). Any change to a higher security level than that set by The Bahamas is to be communicated to the BMA as per Marine Notice 47.

- 4.2. The Company should carry out a detailed and thorough risk assessment to cover all foreseeable security events and it is recommended that the ship's insurers are consulted before committing to any commercial activity in the region.
- 4.3. Bahamian ships should be aware that regional navies may conduct maritime exercises and may call or approach the ship. It is recommended that, in addition to the continuous watch on international distress frequency Channel 16 VHF (156.8 MHz), appropriate local radio frequencies should also be monitored.
- 4.4. It is recommended that, prior to departure from a port in the Gulf of Oman, Strait of Hormuz and Persian Gulf region, consideration be given to undertaking an underwater hull inspection if the Master or Ship Security Officer has any reason to suspect that unauthorised diving activity may have taken place.
- 4.5. During the voyage, whilst at anchor and whilst alongside at ports in the region, additional lookouts should be posted and be aware of the possibility of sea mines or flying objects (drones), which could cause harm to the ship, crew, cargo or marine environment.
- 4.6. If the ship is confronted by any Coastal naval forces in the region, the Master should communicate the ship's name, IMO number, flag, last port of call, next port of call and cargo information (if asked) and maintain the position that they are exercising navigation rights in accordance with International law⁴.
- 4.7. If naval forces attempt to board the ship, the Master and crew should not resist the boarding party and should cooperate with them as far as possible to avoid any unintended consequences or unintended events.
- 4.8. This guidance does not supersede the requirements of the international Conventions, the Company's own safety and security procedures and requirements, or other BMA Notices or Bahamian regulations.
- 4.9. This guidance also does not supersede the Master's overriding authority and responsibility with respect to the safety and security of his/her ship under the relevant international Conventions.

⁴ United Nations Convention on the Law of the Sea (UNCLOS) - Subject to this Convention, ships of all States, whether coastal or land-locked, enjoy the right of innocent passage through the territorial sea (Art. 17)

5. West Africa/Gulf of Guinea covered by Planning Chart Q6114⁵

- 5.1. There has been an increase in the number of incidents in the area from Angola in the South to The Gambia in the North but concentrated in the territorial waters and Exclusive Economic Zones of Benin, Nigeria and Togo. These incidents have included hijack, armed robbery and cargo theft. Many of these attacks are of an extremely violent nature with severe threats to the ship's crew.
- 5.2. Companies operating ships in this High Risk Area must follow Best Management Practice and apply appropriate anti-piracy measures, including enhanced anti-piracy visual and radar watches. Ships may raise their security level in accordance with the Ship Security Plan, as permitted by the ISPS Code, informing the BMA accordingly.

6. Gulf of Guinea Reporting mechanism

- 6.1. A reporting mechanism has been set up for the mutual benefit of Masters and ship owners and is named The Maritime Domain Awareness for Trade-Gulf of Guinea (MDAT-GOG) reporting system.
- 6.2. The MDAT-GOG has been set up in cooperation with the Republic of France by the United Kingdom, in response to a request by the global shipping community. It is designed to contribute to maritime safety and security in the Gulf of Guinea. It is intended to help build a common maritime picture between countries in the region and support actions and interventions by regional Navies in response to piracy attacks.
- 6.3. MDAT-GOG operates in the following way: a ship will signal its position; alerts are then sent to ships within 50 nautical miles of suspect activity; a warning will be issued to a local/regional centre or national Maritime Operations Centre for the intervention of the local navy; and a weekly report is produced for industry. MDAT-GOG is a mechanism rather than a new centre – it is a phone and an e-mail address that goes to an existing French Marine Nationale-maritime information centre. It learns the lessons of the MTISC pilot that came before it, but is not a continuation of that centre.
- 6.4. This is a voluntary scheme and Masters and Owners are encouraged to report to MDAT-GOG when within the Voluntary Reporting Area. By doing so they will receive updates on activity within the area.
- 6.5. Contact details for MDAT-GOG are provided in paragraph 12.5 of this Notice and full details of the scheme and reporting procedures are provided in IMO Circular Letter No. 3684.

⁵ <http://www.ukho.gov.uk/ProductsandServices/MaritimeSafety/Pages/SRIM.aspx>

7. Malacca Straits, Indonesian Archipelago and South China Sea covered by Planning Chart Q6112⁶

- 7.1. In recent years, piracy and armed robbery in this area has tended to be overshadowed by the more significant threat in the Indian Ocean. Despite the excellent work of local government agencies, incidents of armed robbery and hijack do still occur and a threat remains. Masters and Companies should:
- i. Make use of information sources such as the "Piracy & Armed Robbery Prone Areas and Warnings" section of the International Chamber of Commerce's International Maritime Bureau (IMB)⁷ website;
 - ii. ensure that they maintain a high level of vigilance whilst in these waters; and
 - iii. make use of Best Management Practice and enhanced security levels, where considered necessary, in accordance with the SSP
 - iv. make use of the Information Fusion Centre (IFC)⁸ reporting systems implemented in the area;

8. Automatic Identification System (AIS) Policy

- 8.1. The guidelines for the on-board operational use of AIS (IMO Assembly Resolution A.917(22) as amended by A.956(23)) permits the Master to turn off this equipment in sea areas where there is a threat of piracy and armed robbery.
- 8.2. **However, in cases where an attack is expected or suspicious activity is noticed, the AIS should be turned on as soon as possible.**
- 8.3. The BMA requires Companies to take into account the current advice issued by the naval forces, as published on the MSCIO website.

9. Long Range Identification & Tracking (LRIT) Policy

- 9.1. **LRIT equipment MUST NOT be switched off** either before entry into a High-Risk Area or during transit of such an area.
- 9.2. In cases where it becomes necessary to switch off or deactivate the LRIT equipment (e.g. for maintenance/repair or requested to do so by UKMTO, MSCIO or US Naval Control), the BMA must be informed at the earliest opportunity (lrif@bahamasmaritime.com).
- 9.3. When the LRIT equipment is switched off, alternative means of positive reporting are to be in place (e.g. manual reports to the Company at 6-hour intervals, increased

⁶ <http://www.ukho.gov.uk/ProductsandServices/MaritimeSafety/Pages/SRIM.aspx>

⁷ <https://www.icc-ccs.org/icc/imb>

⁸ https://www.ifc.org.sg/ifc2web/app_pages/User/commonv2/aboutus.cshml

reporting to MSCIO, etc.). The times that the LRIT was switched off should be recorded in the Official Log Book.

10. Reporting Piracy/Armed Robbery Attacks

- 10.1. In all cases, the ship must develop an emergency communication plan to be implemented in the event of an attack. The BMA authorises the use of the Ship Security Alert System (SSAS) programmed to alert the Company Security Officer, as set out in BMA Marine Notice 047, as part of this plan.
- 10.2. Owners may wish to use commercial services which automatically transmit the SSAS signal directly to the Authorities (military forces in the Gulf of Aden/Indian Ocean or the International Maritime Bureau for other areas). The BMA has no objection to the use of these services, provided that the additional recipients of the signal are limited to UKMTO, MSCIO or IMB as appropriate and that a suitable filter is applied to ensure that SSAS alerts which occur outside the piracy risk area are not sent to these recipients.
- 10.3. An important feature of the service provided by MSCIO is the broadcasting of advice on suspected pirate "mother-ships" or other suspicious activities. In order to assist in this process, Masters of Bahamian ships are requested to provide UKMTO and the IMB with reports of any suspicious activity or vessels they may observe in or around the area of risk. The BMA must be copied in on any such communication.
- 10.4. In the event that a Master of a Bahamian ship operating in the Gulf of Aden/Indian Ocean region feels a threat of piracy or armed robbery is developing, or if the vessel comes under attack, the primary 24-hour point of contact is the United Kingdom Maritime Trade Operations (UKMTO) in Dubai.
- 10.5. Reports of threats or attacks using the standardised report form should also be forwarded to other recipients shown on the MSCIO website and the BMA, at the earliest practicable opportunity.
- 10.6. For ships operating in other areas (e.g. West Africa, Malacca Strait, Indonesia, South China Sea), the report should be sent to the IMB (International Maritime Bureau) or through ReCAAP ISC (see below) as appropriate.
- 10.7. The BMA is required to make a report to IMO on any piracy activity. To assist the BMA in this task, reports of any piracy or armed robbery must be sent to the BMA Investigations department using the [BMA reporting portal](#) as per BMA Marine Notice 04.

- 10.8. In the event of a ship being boarded by naval forces, the Master should follow the Company's reporting protocols.

- 10.9. The BMA should be advised without delay –
 - i. if the ship is boarded by naval forces; and/or
 - ii. if the ship encounters a major security threat or incident.

- 10.10. The notification is to be made to the BMA with as much of the following information as possible:
 - i. Ships name;
 - ii. IMO number and/or Official number;
 - iii. Geographical location of ship;
 - iv. Cargo, if any;
 - v. Number of persons on board and their nationality/nationalities;
 - vi. Type of event – brief details;
 - vii. Time (UTC) and position of ship at the time of event;
 - viii. Details of damage to the vessel (if any);
 - ix. Current status of voyage (stopped/making way/continuing passage);
 - x. If the ship is continuing on its passage – next port of call;
 - xi. Any other important information; and
 - xii. What assistance required from the BMA.

- 10.11. The information in 10.9 should be followed up by email as soon as practicable to the following email addresses:
 - i. BMA – tech@bahamasmaritime.com and
 - ii. Bahamas ISPS Compliance Unit – ispscompliance@bahamas.gov.bs

- 10.12. At the times when BMA offices are closed and in the case of a genuine emergency, the Emergency Response Officer's mobile telephone number is:

+44 (0)20 3869 8748

11. Pre- and Post-Piracy Planning

- 11.1. Owners and operators of Bahamian ships are reminded of their obligation under the Merchant Shipping (Health and Safety – General Duties) Regulations 1984, *inter alia*, to provide and maintain an environment on board that is, so far as is reasonably practical, safe and without risk to health. Full implementation of BMP as they are appropriate to the ship in question is therefore encouraged and must be fully considered in light of the on-going risk to shipping in the regions specified in this Notice.

12. Sources of advice and information

12.1. *Maritime Security Centre Indian Ocean (MSCIO)*

The Maritime Security Centre Indian Ocean (MSCIO) is an initiative of the European Union Naval Force (EUNAVFOR) ATALANTA, established to enhance maritime security across the Red Sea, Gulf of Aden, Indian Ocean, and Persian Gulf. The MSCIO plays a crucial role in safeguarding global trade routes and ensuring freedom of navigation in one of the world's most strategically significant waterways.

Website: <https://www.msclio.eu/>
Email: postmaster@msclio.eu
Tel: +330298220220 ; +330298220170

12.2. *The UK Maritime Trade Operations Office (UKMTO)*

The UK Maritime Trade Operations (UKMTO) Office in Dubai acts as the primary point of contact for merchant ships and liaises with military forces in the region. UKMTO Dubai also administers the voluntary reporting scheme, under which merchant ships are encouraged to provide their position, course and speed along with ETA at the next port whilst transiting the HRA.

UKMTO Dubai subsequently tracks ships, and the positional information is passed to combined military forces and the EU headquarters. Emerging and relevant information affecting commercial traffic can then be passed directly to ships, rather than company offices, improving responsiveness to any incident and saving time⁹.

Website: www.ukmto.org
Email: watchkeepers@ukmto.org
Tel: +971 50 189 8389, +971 4309 4462

12.3 *The International Maritime Bureau (IMB)*

The main objective of the International Maritime Bureau's Piracy Reporting Centre (PRC) is to be the first point of contact for the shipmaster to report an actual or attempted attack or even suspicious movements, thus initiating the process of response. The PRC raises awareness within the shipping industry, which includes the shipmaster, ship-owner, insurance companies, traders, etc., of the areas of high risk associated with piratical attacks or specific ports and anchorages associated with armed robberies on

⁹ Source: www.msclio.org

board ships. They work closely with various governments and law enforcement agencies and are involved in information sharing in an attempt to reduce and ultimately eradicate piracy.

Website: www.icc-ccs.org
Email: piracy@icc-ccs.org / imbkl@icc-ccs.org
Tel: +603 2031 0014 (24 Hours Anti-Piracy helpline)
Fax: + 603 2078 5769

12.4 The Regional Cooperation Agreement on Combating Piracy and Armed Robbery against Ships in Asia Information Sharing Centre (ReCAAP ISC)

ReCAAP is a regional government-to-government agreement to promote and enhance cooperation against piracy and armed robbery in Asia. To date, 21 States have become Contracting Parties to ReCAAP.

The ReCAAP Information Sharing Centre (ISC) was established under the ReCAAP Agreement. The roles of ReCAAP ISC include exchanging information among Contracting Parties on incidents of piracy and armed robbery, supporting capacity building efforts of Contracting Parties, and for cooperative arrangements.

Website: <http://www.recaap.org/>
Incident reporting: <https://www.recaap.org/lodge-incident-report>

12.5 Gulf of Guinea reporting system MDAT-GOG.

A voluntary system for mutual cooperation between vessels and shore-based establishments to combat Piracy and armed robbery in the Gulf of Guinea.

E-mail: watchkeepers@mdat-gog.org
Tel: +33(0)2 98 22 88 88

13. Queries

- 13.1. Any queries on this Notice may be submitted to tech@bahamasmaritime.com or any BMA office.

Revision History