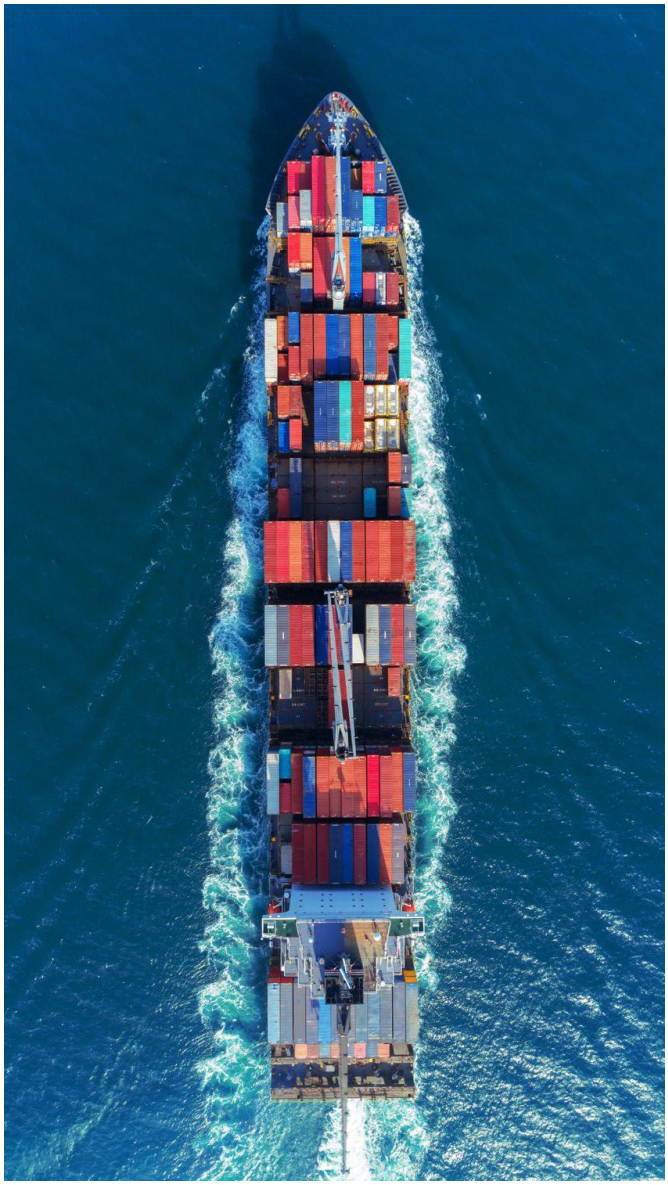
# Crisis24

## Transit Guidelines: Transits, Ports and Anchorages in the Gulf of Guinea (GoG)



**Prepared for**
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# Part 1 Summary of Guidance

## 1.1 Executive Summary

- In 2022, at least 44 maritime security incidents were recorded within the Gulf of Guinea (GoG). Of all piracy events recorded, 15 (36%) occurred within the Nigerian Exclusive Economic Zone (EEZ)
- Although at least 82 passengers were recorded to have been kidnapped in inland waterways this past year, a low estimate of two crewmembers were reportedly kidnapped in 2022. This is a significant decrease from the 71 crewmembers kidnapped in the GoG in 2021, and the 139 kidnapped in 2020.
- One incident of extended duration cargo theft (EDCT) was recorded in 2022. Although an underlying threat persists, it is highly likely the majority of pirate action groups (PAGs) operating in the region are now exclusively focused on maritime kidnap for ransom activity
- Typically, pirate attacks are highly organised, intelligence-led operations and frequently violent, featuring the use of weapons. In 2022, two crewmembers and a captain were injured with machetes by perpetrators who boarded their vessel
- The threat remains for PMSC personnel to be arrested by Nigerian authorities for alleged illegal usage of firearms on board vessels within Nigeria's TTW and/or for operating without proper license. AST teams within Nigeria remain legally required to be comprised of Nigerian naval personnel

## 1.2 Summary of Guidance

**DETER:**

- Recognise risk and establish 'crew mind-set' prior to going into the Gulf of Guinea (GoG). Crew alertness and awareness should be of the highest standard. Conduct regular and rigorous training prior to entry into the region
- Protect vessel, transit and cargo information wherever possible
- Work with all commercial parties and owners to ensure best time of arrival within charter party agreements. Transit into the area only when necessary

**DETECT:**

- Accurate and timely situational intelligence is vital to any safe and secure transit throughout the region. In the GoG there is a constantly shifting area of threat – have a process to monitor information sources accordingly
- Establish stringent watch routines and increase lookouts when in the region

**DELAY:**

- Any access points across the stern, decks and anchor chains should be properly defended with physical security deterrents. A vessel underway is not sufficient enough to deter piracy

- Correct use of citadels has assisted against crew kidnappings, however GoG pirates (given time) will use all means to breach even the most well-fortified citadel – ensure no vessel's equipment is readily available to them to achieve this

**RESPOND:**

- Have a clear decision-making process, ensure all crew understand what to do during an attack or attempted attack. Ensure all methods of communicating to crew are simple, easily heard and quickly understood during a noisy and stressful situation. **Conduct rehearsals of this**
- When necessary enact rehearsed procedures for citadel use – on orders ensure all crew move to the citadel and ensure message of attack is passed
- Compliance / submission to attackers is advised if the vessel is taken and the citadel is breached

# Part 2 Piracy Guidance – Actions Required for Safety and Security

## 2.1 General Counter Piracy Guidance

- Ensure contingency plan is known and rehearsed with contact details and prepared messages for emergency use. Ensure you have the most up-to-date emergency contact details and check call if necessary

- Implement the advice outlined in BMP5 and BMP West Africa, such as compiling a rigorous risk assessment, crew training and preparation, vessel hardening, and maintaining elevated vigilance throughout. Brief all personnel on their duties prior to arrival in the region

- Where possible, keep 250NM from the coastline. Unescorted transits should remain at least 100NM from the coast – the majority of offshore piracy incidents in the past in GoG (outside of waters between the Brass, Okwori, Agbami and Akpo terminals) occurred within 100NM of the coast. However, as has been noted year-on-year, threat actors in the GoG region are increasingly expanding their theatres of operation into deeper waters

- Evidence suggests attacks are intelligence-led with particular focus on targeting product tankers, offshore supply vessels and other vessels engaged in the petroleum trade. With this in mind, communications should be kept to a minimum, with close attention paid to organising rendezvous points or waiting positions. Companies operating regularly in the region are likely to be at increased risk of pirate intelligence collection operations

- Criminal boardings represented the majority of all piracy incidents recorded in 2022, making up 58% of all piracy incidents in the GoG. This is aligned with criminal boardings being the most evident piracy incident in the region in previous years.

- If correctly deployed, fences, razor wire and thoughtful hardening can significantly increase the difficulty of access. Ensure this is planned and conducted prior to arrival in the region

- All heavy-duty equipment should be secured and locked away when not immediately in use. Any equipment left unattended in the event of a boarding can be used by the threat actors in attempts to breach the vessel's citadel

- Citadels should be prepared in line with the Risk Assessment. They can consist of an accommodation block or machinery space, that should be big enough to accommodate all crewmembers on board.

Consideration should be given to the following equipment for use within a citadel:

- **VHF and two-way satellite communications system:** Powered by an independent power source on board with cabling and antenna concealed where possible. Pirates are known to attempt to disrupt or destroy communication equipment. Navigational warnings and communication equipment (in particular VHF, GMDSS and SATCOM) should be thoroughly tested. The communication equipment should have their own battery back-up, so crewmembers can rely on it without using the vessel's main power supply.

- **Navigational aids:** The routeing of a GPS or even a radar feed to the citadel may be beneficial (e.g. a feed from the VDR to a computer)

- **Contact list:** An up-to-date list of key contact numbers should be prepared and left within the citadel. This should include company owners, managers, operators, charterers and other nominated authorities (detailed on pages 11-12). There should be procedures in place ensuring that the list is regularly reviewed / updated as required

- **Medical supplies:** Additional medical supplies over and above standard medical equipment carried on board should be considered, together with an emergency trauma kit to assist with ballistic wounds

- **Food and water:** Sufficient supplies of long-life food and water. Pirates are known to have spent up to 36 hours using tools and cutting equipment to breach the citadel

- **Crew list:** It is recommended that a copy of the vessel's up to date crew list and all personnel on board is kept within the citadel – this will ensure that all personnel and crew are fully accounted for in the event of a citadel retreat being ordered by a master

- **Grab bag:** It is recommended this bag be made available with essential equipment such as torches, spare batteries and portable VHF radios

- **Toilet:** For a prolonged period in a citadel, toilet facilities become a consideration – a portable chemical toilet may be installed where no standard WC is available

- **Bedding material:** Blankets or sleeping bags should be provided, which in addition to their primary purpose, will provide some comfort against a metal deck

## 2.2 Vessels Calling at Ports Within the GoG

- Do not approach the port until you have to – where possible maintain a distance of over 250NM off the port. Prior to entering the region ensure increased watch routine is established. Vigilance and regular

changeovers of watches should be undertaken to remain alert

- Vessels should avoid arriving at the port when not immediately conducting cargo operations if possible. You should liaise closely with your commercial operator to ensure that a valid Notice of Readiness is tendered, and contractual obligations are met

- Contact with the Port Control and other Port Authorities is kept to the necessary minimum

- Report to the Voluntary Reporting Area (VRA) administered by the Maritime Domain Awareness for Trade - Gulf of Guinea (MDAT-GoG). An initial and final report should be submitted upon entering and exiting the VRA, with a daily position report during the vessel's transit of the VRA. Details on the VRA and reporting format can be obtained from UKHO/Admiralty Chart Q6114 – West Africa including Gulf of Guinea (Latest update February 2019)

- SafetyNet and navigation warning broadcasts on Inmarsat C is provided by NAVAREA II (France) and NAVAREA VII (South Africa). See Admiralty List of Radio Signals (ALRS) Volume 5 (NP285) for full details, schedule transmission times, etc.

- Minimise the use of VHF. Use email or secure satellite telephone. Use email or secure satellite telephone instead. Only answer known or legitimate callers on VHF bearing in mind that imposters are likely

- Reduce Automated Identification System (AIS) data to the minimum required. Do not include any cargo details

- For email correspondence to Agents, Charterers, Chandlers etc. it is strongly recommended that address lists be controlled and that information within the email is concise, containing the minimum that is legally required in order to fulfil requirements or contractual obligations

- Know your agents. Avoid or minimise information requirements where possible, the more interaction with other parties opens opportunities for intelligence on the vessel's location to be compromised and complicate the number of callers

- If the vessel calls regularly in the region it is recommended that arrangements be altered occasionally to make it harder for criminals to predict where operations may occur

- If conducting ship-to-ship (STS) operations, where practicable offer a choice of rendezvous locations. Advise rendezvous points at the last minute, and if waiting keep well off the coast (beyond 250NM), as attacks have taken place up to 245NM. Do not give away waiting positions. Avoid waiting and slow steaming where possible. Attacks have taken place in pilot boarding areas

- Watch crews should remain vigilant for small boats, canoes and fibre glass speedboats which may circulate in local fishery traffic in ports and anchorages to conduct reconnaissance or criminal boardings

- At night and if static, consider using hoses as a deterrent to small boats approaching the vessel

- Where possible, avoid night time STS operations or any operations at anchor – for prolonged operations consider daytime operations only, even if this means two or more STS to complete the operation. At night it is advisable to depart the area and steam away from the coastline

- At anchor or if conducting STS operations, it is vital that a full radar and visual lookout is maintained

- Ensure lights on the vessel allow the officer on watch to detect any approaches or security breaches on the shore and seaward sides. Carefully places mirrors can also eliminate blind spots and assist crewmembers in securing the vessel. Mirrors should be placed in such way that the watchkeeper can see from the bridge the vessel's quarters, the whole steer sector and the propeller wake. An early warning of any approaching craft is essential in order to give crewmembers time to respond and / or retreat to a Safe Muster Point / Citadel

- Where practicable a prolonged stay at anchorage is to be avoided due to the serious threat of criminal boardings and armed attack

- Slow steaming and drifting are not recommended while transiting the VRA

- Pirates have boarded via Yokahama fenders on vessels engaged in STS operations or even via anchor chains / hawsepipe. When at anchor, hawsepipe covers must be properly secured and consider keeping the anchor washers running

- Where meeting a convoy such as those offered for the Bonny River, prior registration is often required. The approach should be timed to meet the convoy at the designated time to avoid a slow approach to the forming point

- Where possible maintain a distance of at least 50NM from offshore installations and 70NM from the coastline

- If the vessel is a regular caller to the region, alter arrangements to make it harder for the criminals to predict where operations might take place.  Do not become complacent

## 2.3 Vessels Operating Coastal Transits Within the GoG

- Refrain from unnecessary communications – particularly VHF communications
- Do not respond to any unknown VHF transmissions or to any unknown email correspondence
- Where practicable consider the use of daytime transits only, as the majority of offshore pirate activity occurs in the early morning and evening. It is advisable to begin transits in daylight and conclude / leave in daylight if possible. Full speed transits are recommended
- Maintain a high level of vigilance and implement full ship protection measures. Enhance the lookout and assign additional crew to anti-piracy watch during hours of darkness, including designated personnel for the radar watch

## 2.4 Actions in the Event of an Attack/Attempted Attack: Stop – Think - Act

- Review and practice rehearsed procedures including scenarios underway and at anchor. Sound the emergency alarm and whistle / fog horn. Alerting crew and demonstrating to attackers that the vessel is alert, aware, and reacting to their attack. The alarm should be a distinctive sound to avoid confusion. All alarms should be backed up with an announcement in the working language of the vessel over the accommodation and deck PA system
- If not already at full speed, remain on a straight bearing and increase to maximum speed. If time permits, attempt to make small manoeuvres in course and, if sea conditions allow, expose attacking skiffs to winds / wash. Avoid excessive manoeuvres that will impede speed
- All non-essential bridge and engine room crew should muster at the pre-designated Safe Muster Point / Citadel
- Ensure the SSAS has been activated and AIS is switched on
- Check the VDR data is being saved
- Confirm external doors and, where possible, internal public spaces and cabins, are fully secured
- If the skiffs continue to within 600m, initiate the vessel's pre-prepared emergency procedures. Activate the Ship Security Alert System (SSAS), alerting your CSO and flag state. Broadcast a 'Mayday' call on VHF Ch.16 (156.8 MHz) and a distress message via Digital Selective Calling system (DSC) and Inmarsat-C (if applicable)

- As directed, report the incident to the nominated authorities:

  - **Maritime Domain Awareness for Trade – Gulf of Guinea (MDAT-GoG)** - 24-hour maritime reporting centre based in France / UK
    - Tel (24/7): +33 (0)2 98 22 8888
    - Email: watchkeepers@mdat-gog.org

  - **International Maritime Bureau (IMB)**
    - Tel (24/7): +60 (3) 2031 0014
    - Email: piracy@icc-ccs.org

  - **INTERPOL Command and Coordination Centre**
    - Tel (24/7): +33 (0) 47244 7676
    - Email: os-ccc@interpol.int

  - **Inter-regional Coordination Centre (ICC)**
    - Tel (24/7): +237 696281947 / +237 222217529
    - Email: info@icc-gog.org

  - **Luanda Maritime Rescue Coordination Centre (MRCC) –** covers the territorial waters of Angola
    - Tel (24/7): +237 696281947 / +237 222217529
    - Email: info@icc-gog.org

  - **Monrovia RMRCC** - Monrovia RMRCC covers the territorial waters of Liberia, Guinea, Ghana, Liberia, Sierra Leone and the Ivory Coast
    - Tel: (+231) 777 092229 / International cellular and SMS: (+231) 777 290158
    - INMARSAT C: 463728971 / 463728972
    - Email: mrcc.monrovia@yahoo.com

  - **Morocco RMRCC** - Morocco RMRCC covers the territorial waters of Morocco, Senegal, Mauritania, Guinea Bissau, Gambia and Cape Verde
    - Tel: + 212 5 37 625877 / + 212 5 37 625897
    - Email: mrcc.rabat@mpm.gov.mg

  - **Lagos Regional Maritime Rescue Coordination Centre (RMRCC)** - Covers Benin, Cameroon, Republic of Congo, the Democratic Republic of Congo, Equatorial Guinea, Gabon, São Tomé & Principe and Togo
    - Tel (24/7): +234 (1) 730 6618 / +234 (1) 7053794383
    - Email: rmrccnigeria@yahoo.com

  - **The Nigerian Navy** - Emergency contact numbers (provided by UK Defence Attaché in Abuja and the Foreign and Commonwealth Office):

  - Joint Task Force (Op PULO SHIELD), covering Niger Delta. Tel: +234 (0)802 363 9153 / +234 (0)703 9783346 / email: hqjtfoppuloshield@yahoo.com
  - Naval Headquarters Operations Room. Tel: +234 (0)813 879 9220
  - Department of State Security. Tel: +234 (0)813 222 2106 / +234 (0)813 222 2105

- **IMB Piracy Reporting Centre (IMB PRC)** - Based in Kuala Lumpur, Malaysia. 24-Hour Maritime Security/Anti-Piracy Hotline: +60 3 2031 0014. To report an incident: +60 3 2078 5763 / Fax: +60 3 2078 5769 / email: imbkl@icc-ccs.org / piracy@icc-ccs.org / website: www.icc-ccs.org/piracy-reporting-centre/live-piracy-map

- Maintain contact with the relevant reporting centre preferably by telephone for as long as it is safe to do so. On receipt of information in relation to an attack, the reporting centre will inform the appropriate national maritime operations / law enforcement centre and in some cases military in the area, and should ensure all other vessels in the immediate vicinity are aware of the event

- All crew, except those required on the bridge or in the engine room, move to the Safe Muster Point / Citadel. The crew should be given as much protection as possible should the attackers get close enough to use weapons or board the vessel

## 2.5 Actions in the Event of a Boarding

- Ensure that engine is stopped; all crew should proceed to Safe Muster Point / Citadel. This includes the Master, bridge team and PCASP

- Establish communication with the nominated authority and the vessel's company to confirm all crewmembers are accounted for in the Safe Muster Point / Citadel

- Vessels should ensure that Medical Emergency Plans are arranged with local agents for injured crew members, recent serious armed attacks and hijacking incidents in Nigeria have highlighted the need to arrange extra medical evacuation

- If any member of the crew is captured it should be considered that the pirates have gained full control of the vessel

- If attackers take control of the vessel, violence or the threat of violence is often used to subdue the crew. The chance of injury or harm is reduced if the crew are compliant and cooperative, and the following points should be considered:

  - **STOP ALL MOVEMENT WHEN THE ATTACKERS HAVE TAKEN CONTROL AND TRY TO REMAIN CALM**
  - Offer no resistance once the attackers reach the bridge and the crew have not moved to a Safe Muster Point / Citadel. The attackers will likely be aggressive, highly agitated and possibly under

the influence of drugs or alcohol. When directed, all movement should be **calm, slow and very deliberate**. Crewmembers should keep their hands visible at all time and comply fully. This will greatly reduce the risk of violence
    - Leave any CCTV or audio recording devices running
    - DO NOT take photographs
    - DO NOT attempt to confront the attackers
    - DO NOT make movements which could be interpreted as being aggressive
    - DO exactly what they ask and comply with their instruction

- Crewmembers transiting in the GoG should be aware that pirate groups operating in the area, predominantly those from Nigeria's Niger Delta region, focus on the kidnapping of crew. The following principles are guidelines to seafarers to survive a kidnapping:

    - **DO NOT:**
        - Be confrontational
        - Offer resistance
        - Take photographs
    - **DO:**
        - Be positive
        - Be patient
        - Keep mentally active / occupied
        - Keep track of time
        - Reduce stress where possible by remaining physically active when possible
        - Remain calm and retain dignity

## 2.6 Post-Incident Reporting

- It is vital that a detailed report of the incident is made. A copy should be sent to the company, the flag state and other relevant organisations. It is also important that any report contains descriptions and distinguishing features of any suspicious vessels to aid further analysis of piracy trends in the GoG, and ensure an appropriate warning can be issued to other vessels in the vicinity

- Evidence preservation is key, and companies, masters and crew should refer to the IMO Guidelines on Preservation and Collection of Evidence A28 / Res.1091. When preserving and collecting evidence, the priority should be:
    - Preserve the crime scene and all possible evidence. If the transit to a harbour is likely to take some time the Master should take initial statements from the crew
    - Avoid contaminating or interfering with all possible evidence
    - Do not clean up the area or throw anything away no matter how unimportant
    - Protect voyage data recorders for future evidence
    - Provide easy access to the crime scene and relevant documentation for law enforcement authorities

- Crewmembers should provide witness statements to naval / military forces when requested to do so to enable suspected pirates to be held and handed over to prosecuting states

- Incident reports should be sent to the company as well as the ICC/IMB, MDAT-GOG and Interpol via the West African Police Information System (WAPIS) Regional Bureau in Abidjan

- Contact details:

- **ICC/IMB Piracy Reporting Centre** - Based in Kuala Lumpur, Malaysia. 24-Hour Maritime Security Hotline: +60 3 2031 0014. To report an incident: +60 3 2078 5763 / Fax: +60 3 2078 5769 / email: imbkl@icc-ccs.org / piracy@icc-ccs.org / website: www.icc-ccs.org/piracy-reporting-centre/live-piracy-map

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- **INTERPOL Command and Coordination Centre**
- Tel (24/7): +33 (0) 47244 7676 / email: os-ccc@interpol.int

- Flag registries may require a separate incident report, these reporting requirements should be clarified and complied with

- *Refer to V.Ships* ***Transit Guidelines for Passages off the coast of Somalia, the Arabian Sea, Gulf of Aden and Red Sea Piracy Areas*** *for further information.*

# Part 3 Background Data and Analysis (2022)

## 3.1 GoG HRA

- The GoG High Risk Area has not been amended since 21 September 2020, when the Joint War Committee (JWC) expanded the GoG waters to be enclosed by the following boundaries. This is outlined by the points below and the map to follow.
    - On the west, from the coast of Togo 6° 06′ 45″ N, 1°12′E, south to
    - High seas point 0° 40′ S, 3° 00′ E
    - East to Cape Lopez Peninsula, Gabon 0°40′S, 8° 42′E.


**Image 1:** Representative zone of the high threat piracy in the GOG
**Source:** Crisis24 MarTrack™

## 3.2 Pirate Areas of Operation

- **Concentration area:**
  In 2022, 44 piracy incidents were recorded in the GoG. This marks a 34% decrease from the 67 incidents recorded for 2021. This is a continuation of the trend as was seen from 2020-2021, where a decrease of 43% of piracy incidents were noted for the area. 17 (42%) of the incidents recorded for 2022 in the GoG took place inside the Nigerian EEZ, which is largely in line with the 39% recorded for 2021 and the

44% for 2020, confirming the overall trend and high-risk area in the stipulated EEZ. Piracy in Nigerian waters have mostly been composed of waterways piracy, with 12 of the 15 incidents reported in the Niger Delta waterways, including 10 hijacks, one suspicious approach and one attack on a passenger vessel. Although the number of criminal boardings was seen to decrease over the past three years in the GoG, with only six recorded incidents in 2021, 2022 saw an increase in the stated type of incident, recording 24 for the year. The majority of criminal boardings remain clustered around regional ports and anchorages, specifically that of Takoradi and Luanda Anchorage. The two stated anchorages have experienced a total of 15 incidents, which make up 63% of all criminal boardings in the GoG.

- From 2018 – 2021, a growing trend of Nigerian PAGs expanding out from Nigeria's EEZ was seen. During these years, incidents taking place close to the Nigerian coast were rare. This was coupled with PAGs conducting operations between the maritime boundaries between Ghana, Togo, Benin and Nigeria in the deep offshore areas bordering international waters. This past year, however, has seen a shift in these trends as the numbers of piracy incidents in the region have decreased substantially. The majority of PAGs were seen rather to target passenger vessels through hijackings within the Niger Delta waterways and to follow through with criminal boardings at anchorages throughout 2022. The change in such operations is depicted visually by the maps below.

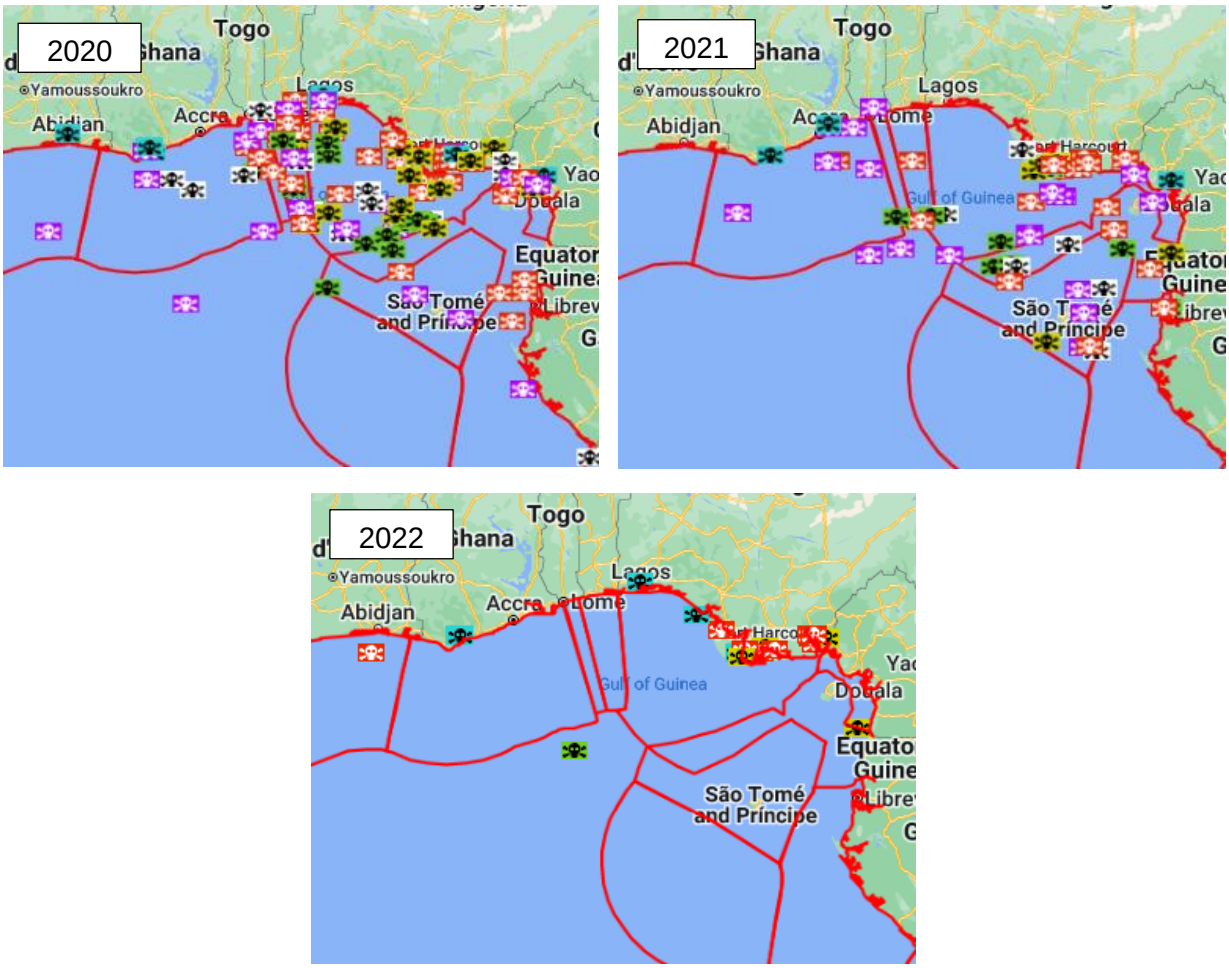


**Image 2:** Maritime incidents in the GoG from 2020 (top left), 2021 (top right) and 2022 (bottom middle)
**Source:** Crisis24 MarTrack™

- **Southerly:** Further south, there were 12 piracy incidents recorded for the area with the main threat remaining criminal boardings. In previous years, the main hotspots were Pointe-Noire Anchorage, Republic of Congo, Banana Anchorage, DRC and Luanda Anchorage, Angola. With 11 criminal boardings reported south of the JWC listed area in 2022, there has been a 57% increase in comparison to 2021. The majority of these took place at Luanda Anchorage, followed by the Congo River. Besides the criminal boardings, there was one suspicious approach that was recorded at Pointe-Noire, throughout southern GoG for the past year. As in the rest of the GoG, the incidents south of the JWC listed area were located close to shorelines and within anchorage areas, indicative that local criminal groups with limited capacity to conduct far-reaching and sophisticated seaborne attacks are the most likely perpetrators.

- **Westerly:** A total of 13 incidents were recorded for the area west of the JWC listed area, this is an ever-slight increase of 8% from the previous year. The majority of the incidents that occurred were clustered off Takoradi Anchorage and were criminal boardings. Over and above these boardings were a few scattered incidents further west and offshore. The two outlying incidents, further offshore, included one boarding, 261NM SE off Accra, Ghana and one hijacking, 53NM SSW off Abidjan, Ivory Coast. In total there were 10 incidents of criminal boardings (77%), one hijacking (8%) and two boardings (15%) recorded for the west of the JWC listed area. The edge of the EEZs of Ghana, Togo, Benin and Nigeria were identified as high-risk areas in previous years as PAGs had the ability to traverse multiple country's maritime territories at speed with little to no rapid response from neighbouring naval forces. However, this year a decrease in the stipulated method was seen as the majority of incidents were reported in close proximity to the shores. There is a likely possibility for PAGs to persist with this method in the medium to long term.

- **JWC Zone**: As highlighted, the JWC defines the GoG zone as encompassing the entirety of Nigeria's coastline and inland waterways. The zone extends north of Calabar, Uyo and Port Harcourt taking in the Cross River and encompassing the entire Delta region up to the Olobo Game Reserve, before returning to hug the coast. The line then extends around Lagos and the Lagos Lagoon making it part of the GoG Zone. The territorial waters of Togo and Benin remain classified as being parts of the zone, as do the entirety of Cameroon's and Equatorial Guinea's maritime boundaries as per the latest JWC update of September 2020. This update extended the zone south of Lome, Togo to deep offshore at approximately 0:40S – 0:30E then east 0:40S – 08:42E to the Cape Lopez Peninsula, Gabon. This zone also encompasses the waters surrounding São Tomé and Principe and the north-western coast of Gabon.

- The JWC listed area saw the majority of PAG activity during 2022, the 15 incidents making up approximately 36% of the overall recorded incidents in the GoG. Of these 15 incidents, 10 incidents (67%) were hijackings in the waterways of the Niger Delta, this was followed by three criminal boardings

(20%) and two attacks (13%). In previous years there was a trend of incidents occurring further offshore within the JWC listed area, however, this past year, the recorded incidents are close to shore and within the estuaries and waterways. The furthest incident in the demarcated area was a criminal boarding that took place approximately 12NM W off Escravos River, Nigeria. This was a particularly notable incident as the assailants were armed with machetes, a common form of weapon used by the pirates in the region and attacked the captain and crew whilst stealing valuables and forcing the crew to transfer them money.

- Although 2020-2021 saw an expansion of piracy incidents out of the Nigerian EEZ, specifically SE into the waters of Equatorial Guinea, Gabon, Sao Tome, and Principe, 2022 saw a decrease of such. All piracy incidents recorded within the GoG were close to shore, bar from one outlier which occurred on 29 January 2022, 25NM NNW of Bata, Equatorial Guinea, in the form of an attack.

- In 2022, the majority of hijacks in the wider region took place in the waterways in the Nigerian EEZ; with all occurring in the stated region. The trend in which piracy within the Cameroonian EEZ has gradually decreased since 2019 has been confirmed, with two attacks being reported in between the Cameroon's and Nigeria's EEZ, the most recent incident involving a reported hijacking on 13 December 2022 approximately 44NM SW of Luma, Equatorial Guinea.

- It is notable that the majority of the criminal boardings in the wider region took place in Angola's EEZ, the total of eight such incidents were specifically clustered in the Luanda Anchorage area. The most recent occurred on 23 July when three criminal actors boarded a small passenger vessel and stole the craft's engine. As seen with the other incidents in the anchorage, criminal elements rely on smaller crafts or motorised canoes to gain access to anchored vessels. There were no reported altercations between crewmembers and the intruders, further highlighting that the perpetrating criminal actors are opportunistic and are unwilling to resort to violence.

- **Range:** Although the range of hijacks, boardings and attacks from the coast has increased substantially over the past years, 2022 saw a sharp decrease in this, with the majority of piracy related incidents occurring close to shore and in waterways, as Nigerian naval authorities have demonstrated increased capabilities of patrolling commercial shipping lanes within its territorial waters. There was one outlier in the entirety of the year whereby a boarding was recorded on 261 NM SE of Accra, Ghana on 3 April 2022. Although this decrease was observed over the past year, perpetrators have shown the ability and capacity to use motherships and expand their operational range. Heading into 2023, the possibility of incidents occurring in the deep sea waters away from coastlines remains likely.

## 3.3 Overview of Attacks

- West African piracy is highly organised: Pirates conduct sophisticated intelligence-led operations and are selective in the targets they attack. However, if unsuccessful in hijacking their primary target, these groups are known to widen their victim pool in the immediate term.

- The majority of PAG members are well trained, experienced, and proficient with the use of navigational equipment and small vessels such as skiffs and speedboats. Experienced pirate groups are able to conduct a successful hijack/kidnapping operations within 40 minutes and vacate the area long before a naval/security response arrives at the incident location. However, they have been known to seek to expand their operations to areas where national maritime authorities take a longer time to respond to incidents. Despite the relatively low number of hijacking incidents in 2022, the threat remains elevated for both smaller transport and larger commercial vessels into 2023.

- Pirates come from diverse backgrounds; ordinary citizens and disaffected youths hired to participate in piracy incidents, militants, criminals, 'area boys' and former members of the Nigerian Army, Navy, or Police Force. Consequently, the makeup, skills and capabilities possessed by pirate groups differ between the various groups.

- During kidnappings, victims are susceptible to beating and/or manhandling during the initial boarding in which the pirates attempt to subdue those they plan to take from the vessel. PAGs have also fired on vessels likely as a scare tactic and have been known to engage in short firefights with onboard security teams (OSTs). In 2022, four criminal boardings took place which involved crew members and captains being wounded, with the types of weapons utilised by the perpetrators ranging from knives, firearms, and machetes.

- Statistically, vessel types most targeted by PAGs in 2022 consist of: passenger vessels (29%), bulk carriers (12%), container vessels (7%) and fishing vessels (7%). These types of slow-moving vessels, operating with limited or no apparent onboard security features, are and will continue to be susceptible to be intercepted by rapid pirate-operating skiffs and speedboats.

## 3.4 GoG Categories of Attack

The level of pirate activity within the GoG can be broadly split into the following categories:

- **Criminal Boardings:** Often carried out at night when in port or anchorage. Since 2014 criminal boardings have been recorded in 13 countries in West Africa. Although the least severe and violent of all piracy incidents, previous cases have included the use of weaponry including machetes (as was seen with the incident on 28 October 2022 when assailants armed with machetes boarded an offshore supply vessel and attacked the captain and two crew members with machetes, whilst stealing money and valuables), long knives and handguns, particularly by groups operating around Conakry Anchorage, Guinea. The intention of such robberies is often to gain valuables from the crew such as smart phones, laptops, digital devices, and vessels' stores and equipment. Perpetrators, particularly if acting alone, are primarily opportunistic and aim to operate discretely and without detection, though interactions can escalate/

- **Kidnapping:** Maritime kidnap for ransom incidents have been largely confined to Nigeria's EEZ, specifically within waterways and estuaries over previous years. It was seen in previous years that the

stipulated incident type expanded to encompass the larger area of the GoG, both across neighbouring maritime boundaries and deeper offshore. This, however, has not been the case in 2022, as with the other piracy incident types, kidnapping has remained close to shore. PAGs predominantly target passenger and fishing vessels, as these make up the majority of vessels within the estuaries and waterways in Nigeria's EEZ. Captains, chief engineers, and senior crewmembers are the most likely to be kidnapped and foreign nationals, particularly white Europeans, are the most highly regarded for obtaining a large ransom payment. Victims are held in land-based camps predominantly in thick mangroves and swamps of the Niger Delta region and can be kept captive for a period of days to several months. Ransoms vary from the tens to the hundreds of thousands of dollars.

- **Extended Duration Cargo Theft:** Tanker hijackings with the motive of large-scale cargo theft began originally in Benin, before spreading to Angola, Ivory Coast, Equatorial Guinea, Gabon, Ghana, Nigeria and Togo. EDCT hijackings, globally, tend to be organised with an integrated criminal element involving commercial interests ashore. After no reported cases of EDCT in 2017, five incidents suspected or confirmed to have been motivated by cargo theft occurred in 2018. On 24 January 2022 the first and only incident of EDCT since 2018 occurred when suspected pirates attacked a tanker vessel and disarmed the onboard security guards 53NM SSW off Abidjan, Ivory Coast. The assailants came alongside the vessel with a tanker and stole approximately 850t of fuel, weapons and crew belongings before escaping.

## 3.5 Analysis of GoG Kidnapping

PAGs generally operate in large numbers (the average is six to eight, with as little as two and up to 20 in a minority of incidents) to overwhelm and immediately suppress any onboard armed security or resisting crewmembers. The preferred vessels for PAGs are speedboats, skiffs and other small, fast-moving crafts that easily go undetected via transiting vessel's radar systems. Vessels are approached at high speeds and boarded using ladders with an initial show of force, often accompanied by sporadic warning shots into the air. In 2022, recorded attack incidents were perpetrated by armed persons, the vast majority of pirate groups having at least several firearms (witness testimonies often mention varieties of the AK-47 assault rifle), and melee weapons such as machetes or knives. If/when successfully boarded, crewmembers, particularly those of perceived high value such as captains, chief engineers and officers are kidnapped and brought to Niger Delta PAG bases to be held for ransom (while reports have claimed at least one PAG has a base in Equatorial Guinea, no witness testimonies or official sources have yet confirmed it).

Incidents continue to suggest that West African piracy is primarily intelligence-led. Some PAGs are operating 'on station' and have been recorded as attempting several attacks and/or boardings in a maritime area spanning periods of 24 hours to a week before a successful hijacking/kidnapping is achieved. PAGs have been seen to be operating with fuel stores on board fiberglass speedboats to enable increased operational capabilities. This follows trends first observed in 2015 when PAGs were observed operating coastal patrols from Nigeria to Senegal.

- **Motherships**: Used in West African piracy operations since at least 2012, the most common types are

captured fishing trawlers and tugboats. Motherships may proceed with skiffs to enable high speed boarding attempts by launching them when at a safe distance from a targeted vessel. The mothership also allows for a larger number of victims to be accommodated on board in the transit back to land. Vigilance and careful watch should be maintained upon sighting non-AIS reporting, unlit or dimly lit fishing trawlers and tugboats. Motherships can operate at significant distances from the baseline coast and have been reported across the GoG including deep offshore and in coastal areas of West Africa between Gabon and Angola. Although the use of motherships was seen to be increasing over previous years, 2022 saw a decrease in the use of the stated method as most attacks happened close to shore. Although this is so, perpetrators still pose a threat to utilising the known method going into 2023 to enhance their operational range.

- **Pirate knowledge:** Attacks throughout West Africa have shown highly developed awareness of the crew usage of citadels, vessel communication systems and STS transfer processes. In attacks and boardings, vessel communication equipment is routinely disabled, damaged, or purposely destroyed to conceal the location of the vessel during and after hijack. The use of the citadel is no guarantee of safety as recent incidents have demonstrated pirate groups willingness to spend up to 36 hours using cutting tools to breach a secure room/citadel. This threat is increased significantly if the vessel is boarded deep offshore, as pirate groups are aware of likely response times of the nearest maritime security forces and persistent issues surrounding jurisdictional responsibilities.

## 3.6 Analysis of EDCT

One incident of EDCT was recorded this year, as described above. This is the first such incident since 2018, where there were five recorded within the stipulated year. As such, it is assessed that the threat posed by EDCT is low, as the vast majority of PAG groups now exclusively focus on maritime kidnap for ransom operations or the theft of crew and vessel valuables from anchored vessels at the region's ports and anchorages. This shift is likely as a result of the time taken to conduct a successful operation and the chances of a successful escape before a security response can be mobilised. The significant payoff for kidnapped crewmembers and the comparatively fewer parties needed to be involved have also ensured maritime kidnap for ransom is now seen as more financially lucrative and viable than EDCT operations. However, the threat posed by EDCT should not be completely dismissed and is likely to remain an underlying concern in the medium to long term.

## 3.7 Militancy in the Niger Delta

- In 2022, there have been no confirmed major militant attacks against Niger Delta-based oil and gas assets. This is in-keeping with the lack of activity in 2021 and 2020, and the last verified incident of this kind remains a targeted attack on an oil pipeline on 20 May 2017. This incident took place in Warri, Delta state, and was reportedly carried out by members of the Niger Delta Avengers (NDA). Despite this seeming reduction in incidents, attacks against oil and gas infrastructure remains a significant threat in the Niger Delta, as militant groups continue to issue ultimatums to international

actors in the region threatening to put an end to their operations. These ultimatums are usually the result of deteriorating relations between Niger Delta communities and the Federal Government (FG), and tend to centre around wider socio-political issues such as youth unemployment, regional inequalities, the marginalisation of ethnic minorities, and police brutality. In 2022, these tensions were largely centred around local concerns regarding environmental degradation and ongoing discussions over the implementation of the Petroleum Industry Bill (PIB).

- Whilst no major militant attacks on oil and gas assets have been noted, small-scale skirmishes between Niger delta militants, the FG, and IOCs have taken place regularly. For example, on 5 November 2022, gunmen suspected to be members of the Biafra Nations League (BNL) (a branch of Indigenous People of Biafra), abducted three oil workers in the Atabong area of Bakassi in the Cross River State. Incidents like this occur fairly frequently as a result of ongoing tensions between the various actors in the region.

- Over the course of the year, a number of ultimatums were issued by various groups, including the Reformed Niger Delta Avengers (RNDA), the Niger Delta Volunteers (NDV), the Niger Delta Environmental Crusaders (NIDEC), an Isoko youth coalition, and the Itsekiri Liberation Group. The groups threatened to target International Oil Companies (IOC) and wreak havoc in the region lest their demands were met. For example, on 12 March 2022, NIDEC issued a one-month ultimatum to all IOCs in the region to anticipate attacks on their operations as a result of environmental degradation and the unemployment of youths in the area. As in this case, the majority of ultimatums are issued as a means of leveraging the Nigerian FG into responding to demands, typically in the form of amnesty payments, and as such the majority of threats do not result in actual damage to the IOC personnel and infrastructure.

- Going into 2023, it is highly likely that further threats against Niger Delta energy infrastructure will be issued as a result of the significant lack of progress made by the Nigerian Federal Government in addressing local grievances surrounding underdevelopment, regional poverty, unemployment, and environmental degradation. For although the resumption of the Amnesty Programme in 2017 was largely effective in halting attacks on oil and gas assets in 2016, it remains a temporary solution to the problems in the Niger Delta. As such, minor skirmishes, and sabotage attempts, including the abduction of personnel, are likely to continue into the medium- to long- term, or until solutions to deep-rooted socio-political issues in the region are found.

# Part 4 Use of Armed Guards in the Gulf of Guinea

## 4.1 Headlines

- Any armed guard provision by Private Maritime Security Companies (PMSCs) in the GoG must, by law, involve a local guard partner and is subject to a wide range of quality control issues
- Private armed guards cannot be embarked on a commercial vessel in the Nigerian EEZ. Instead, the detachment of Nigerian Navy guards should be deployed on board an approved escort vessel
- Although no incidents were reported in 2020-2022, several incidents in 2019 involved Nigerian security forces detaining PMSC personnel suspected of violating Nigerian law on PMSCs, typically on charges relating to illegal possession of firearms or for not having the appropriate permit and/or licence to operate. In October 2019 Nigerian naval forces arrested seven PMSC personnel for escorting an oil tanker through Bonny Anchorage without an "appropriate permit"
- There are no genuine guarantees of security available when using locally provided armed guards; vessels must manage expectations when dealing with local providers
- Prolonged detention of vessel and crew should be expected for breaches of MOUs

## 4.2 Legislation

**NIGERIAN PRIVATE GUARD COMPANIES (PGC) ACT 1986**

The act to regulate and provide for the licensing of private guard companies which must be wholly owned by Nigerians (Part I Article 13 (1e) the licensing shall not be granted if any director of the company or person applying for the license is not a Nigerian). A license may be suspended or revoked by the Minister at any time where in his opinion the company holding the license is unsuitable or ownership or interests in the company has changed. According to the same rules, foreign companies are allowed to operate in Nigerian waters only as partners. In Part II, Article 17 the Act stipulates that: "*No person approved under the provisions of this Act shall bear or possess firearms or ammunition in the course of his duties".*

Under the **Private Guards Companies Regulations 2018**, several further provisions were added to the Act. For example, at least one of the directors of a private guard company must be a retired commissioned officer, formally of the Nigerian Police Force, Armed Forces or any other military or paramilitary body in Nigeria. Most importantly, the Regulations expanded the categories of companies requiring a PGC licence. These include companies that provide:

- The sale and installation of security equipment
- Security consultancy services
- Corporate security services
- Industrial and electronic security
- Security functions with electronic devices for whatever reason, commercial or otherwise

The Regulation also stipulates that only personnel that have been trained and certified by an NSCDC curated program, or a recognised program from a connected institution, will be allowed verification for fieldwork. Any violations of rules stipulated in the Regulations will attract financial penalties of N500,000 (USD1,300) for companies and N100,000 (USD260) by a person or guard.

**SECURITY AND CIVIL DEFENCE CORPS ACT NO. 2 OF 2003 AND AMENDMENT ACT OF 2007**

Acts granting authority to the Nigeria Security and Civil Defence Corps (NSCDC) to license, monitor and supervise PMSCs. According to its website, NSCDC has divided Nigeria into nine PMSC zones and intervenes whenever required in order to safeguard security. The NSCDC's licensing authority was further strengthened under the Private Guards Companies Regulations 2018 and all PMSC personnel are required to conduct NSCDC recognised training to be allowed to conduct activities on the ground.

**UNCLOS**

The UN Convention on the Law of the Sea 1982 ('UNCLOS') does not regulate PMSCs or the open carrying of weapons on the seas, in particular. Under Article 94(1) of UNCLOS, each state must exercise jurisdiction and control over vessels flying its flag. Therefore, regulations governing the carriage of weapons are those implemented by the flag state, but a vessel must also comply with the law within the maritime territory of the state it enters. A state may therefore prohibit the carriage of any weapons into its territorial waters, even in cases where there is no violation of the law of the vessel's flag state.

**UNSCR / WEST AFRICAN (YANOUDÉ) CODE OF CONDUCT**

Legislation governing the offences that are known as piracy and which include armed robbery at sea were covered by UNSCR 2018 and 2039 (2012). This pushed West African states to create the Code of Conduct Concerning the Repression of Piracy, Armed Robbery Against Ships and Illicit Maritime Activity in West and Central Africa signed on 25 June 2013 (Otherwise known as the West African/ Yaoundé Code of Conduct). Though the Code of Conduct specifies actions by signatory states, it places the onus on them and does not give scope for PMSCs, which may be in contravention of specific elements, i.e. 5.2.b, which covers illegal arms trafficking.

**BIMCO / GUARDCON**

On 20 February 2014, BIMCO issued a Special Circular outlining guidelines for the use of GUARDCON when engaging PMSCs as intermediaries to employ local security guards within territorial waters, particularly in the GoG. The advisory emphasises that GUARDCON is designed exclusively for contractual arrangements between PMSCs and shipowners. It provides a framework for the provision of on-board security teams for transits on the high seas only, not for within territorial waters. Moreover, GUARDCON should not be used to engage local security personnel through a local agent. On 13 January 2022, BIMCO published SEV-GUARDCON, a valuable benchmark, which is their new standard contract for employing security escort vessels to accompany merchant vessels in high threat areas such as the GoG. It provides

a balanced and clearly worded framework with liability and minimum insurance requirements mirroring those of the original GUARDCON.

**NIGERIAN OIL AND GAS INDUSTRY CONTENT DEVELOPMENT ACT 2010**

The act legislates that international or multinational companies can only operate within the oil and gas industry in Nigeria if:

- A minimum of 50% of the equipment deployed for the execution of work is owned by a Nigerian subsidiary
- Nigerians own at least 51% of the equity shares
- A succession plan is submitted to allow understudies for a maximum of four years to remove the 5% of management position occupied by expatriates to allow those positions to be “Nigerianised”
- 95% of security services spending and 90% of the man-hours for health, safety and environment services go to Nigerian controlled companies or subsidiaries
- 80% of spending for the provision of security services at oil and gas locations and platforms go to Nigerian controlled companies or subsidiaries
- All operators, contractors and sub-contractors maintain bank accounts in Nigeria in which they shall retain a minimum of 10% of their total revenue accruing from Nigerian operations

**COASTAL AND INLAND SHIPPING (CABOTAGE) ACT 2003**

Places strict restrictions on the ownership, manning, maintenance, building, towing, carriage of goods or conduct of services within Nigerian EEZ. Under almost all circumstances only Nigerian wholly owned, manned and maintained vessels can operate within the Nigerian EEZ, this includes the carriage of materials or supply services to and from oilrigs, platforms and installations offshore and onshore. Only if deemed by the shipping minister that the type of operation cannot be conducted safely and / or is beyond the capability of Nigerian owned or operated vessels then approval can be granted to foreign owned and manned vessels operating within Nigerian waters.

## 4.3 Contracting of a PMSC in Nigeria

**LOCAL SERVICE PROVIDER**

Due to the restrictions on ownership and operation imposed by the Coastal and Inland Shipping (Cabotage) Act 2003 and Nigerian Oil and Gas Industry Content Development Act 2010 operations must be conducted via a Nigerian owned company or subsidiary. These partners or subsidiaries are termed ‘Local Service Provider’.

Foreign PMSCs have chosen to operate via an NSCDC approved Category A or Category B Nigerian PMSC vetted partner or to establish a Category A or Category B NSCDC approved majority owned and operated Nigerian subsidiary. Clearance is also needed from the State Security Service (SSS) before licences are granted.

## MEMORANDUM OF UNDERSTANDING

The Local Service Provider will need to sign an MOU with the Nigerian Navy (NN) in order to receive a deployment of Nigerian Navy personnel; at least 42 security companies have MOUs. The MOU gives authorisation and clearance for NN to operate on appropriate, privately owned patrol boats that meet the requirements of the NN. These patrol vessels will be owned and operated by Nigerians in line with the Cabotage act. The MOU will be specific to each company and vary on the level of protection afforded and commitment deployed. Registration with NIMASA and the Nigerian Federal Police, if possible, is recommended.

MOU share common passages:

- "The Navy shall deploy armed naval personnel on board [Company's] approved vessels only for the purpose of maritime security duties consistent with the policing roles of the Navy… this includes the continuous manning of the mounted weapons onboard the vessels"
- "The Company shall comply with the Local Content Act in its operation"
- "The Company's vessels shall be registered as required by the extant law with NIMASA, such vessels shall be additionally inspected by the Navy and confirmed to meet required NN standards for bearing arms and ammunition as well as meet International Classification Society standards"

The Marine Police has issued permits to shipping agents, Nigerian PMSCs and vessel operators for the embarking of four or more NMP within waterways and ports, however, the practice has never been sanctioned by the Inspector General of the Police (IGP) and is conducted seemingly without authority by Western and Eastern Maritime Police Command commissioners.

## CONTRACTING OF SERVICES

The Local Service Provider will then become the focal point for the contracting of services, signing the GUARDCON with shipowner and meet the insurance requirements leaving concerns over reporting, auditing and oversight of the Nigerian partner and subsidiary.

## DEPLOYMENT

With the MOU in place, the request to have a deployment of between six to eight Nigerian Navy personnel will be arranged, this will take three weeks or more. The personnel will then be deployed up to a maximum of 50NM offshore for rendezvous upon an appropriate Cabotage compliant, privately operated patrol boat, the boat will receive a Nigerian Navy pennant number and become manned by the Nigerian Navy. This allows the privately owned vessel to become an escort vessel for terminal and convoy operations and provide stand off support whilst at the terminal or STS transfer. The boat hire, food and fuel for the vessel is an additional cost.

Once on board the Nigerian Navy personnel have been described by two security managers for multinational fleets operating in Nigeria as "more a hindrance than a help". They described how the soldiers

seemed afraid, had been issued a single magazine or multiple old magazines tapped together, that sea water had corroded their assault rifles or was in the magazines. The personnel were also provided unsubstantial uniforms and were shaking from adverse weather conductions causing them to shake and drop their weapons during battle drills. In one specific incident, a country security manager described how the deployment refused to disembark and board a passing NN vessel because they could not swim. The refusal forced the vessel to return to Port Harcourt and repeat the transit.

Alternatively, Intel Logistics, Protection Plus and Ocean Marine Security (OMS) operate regular fixed convoys from Onne to the fairway buoy and Warri to Brass, however the cost is prohibitive and requires transits to run exactly to schedule with no leeway.

**VESSEL LIAISON OFFICERS (VLO) / DETACHMENT LIAISON OFFICERS (DLO)**

The VLO are often British or European expatriates with military backgrounds. The VLO has an advertised role of coordination and support to the Nigerian Navy detachment. The VLO may board the merchant vessel for the transit within the Nigerian EEZ under a Temporary Work Permit (TWP) or be flown into Ivory Coast or Ghana and board the merchant vessel heading into Nigeria.

DLO are Nigerian employees of the local service provider and mainly recruited from former members of the Nigerian Army, Navy, Federal Police, Prison Service, Fire Service or Customs. The Nigerian Private Guard Companies Act 1986 Part I Article 13 (1c) stated that no such former government employee can be employed if they have been “dismissed discharged or otherwise removed on disciplinary grounds”. The DLO will embark upon the escort vessel and directly liaise and/or manage the Nigerian Navy detachment.

Both DLO and VLO’s have advertised roles as identifying and improving integration between the local Nigerian service provider and the embarked Nigerian Navy personnel, as well as non-advertised roles that in certain foreign PMSCs include weapon and Rules for the Use of Force training. Both the VLO and DLO cannot “bear or possess any firearm or ammunition in the course of his duties” or “supply or offer to supply to any other person any firearm, ammunition, tear gas or similar manufactured weapon” according to the Nigerian Private Guard Companies Act 1986 Part I Article 17 and Part III Article 24 (2a) respectively. Although in theory the use of training in firearms is not illegal under either the Private Guard Companies Act 1986 or the Firearms Act 1990, it falls into a legal grey area into which the spirit of the laws are not being applied.

**TEMPORARY WORKERS PERMITS**

The spirit of the law is clearly broken in the process of acquiring a Temporary Work Permit (TWP) for expatriate VLOs to enter Nigeria. The TWP allows according to the Nigeria Immigration Service “experts invited by corporate bodies to provide specialised skilled services” entrance to the country.

The TWP either is available in 48 hours or 7 days short stays with the requirement of a confirmed airline return ticket, national business support letter and an immigration responsibility acceptance by the inviting organisation either the shipping company or Nigerian local service provider. The immigration responsibility

acceptance letter and business support letter have attracted the attention of both NIMASA and the Nigerian Navy following the arrests of foreign expats due to their usage as a route to circumvent controls.

Contractors from the foreign PMSC in some instances have gained TWPs under false pretences, claiming to be conducting work in a maritime related industry position (such as diver, specialist engineer etc.). It is unknown whether this practice is overlooked or just undiscovered by the Nigeria Immigration Service, as each rapid TWP visa application must be approved and provide a cable message from the Comptroller General of Immigration (CGIS) to authorise each TWP. Most likely this is undiscovered as the Nigerian Police Force Special Fraud Unit remains overburdened by the attempts to counter domestic falsified documents, national identity cards and passports.

Once approved under a false pretence the contractor travels internally to board the vessel and conduct their original VLO purpose but under a false crew manifest title. Several issues arise, beyond the obvious problem of committing a false declaration to acquire a visa, one of which is the short term TWP. The TWP can only be attained for 48 hours or 7 days, this raises the risks for the contractor of overstaying their visa requirements due to delays or non-sailing of the transit vessels.

Some foreign PMSC contractors are now moving towards using a Combined Expatriate Residence Permit and Aliens Card (CERPAC) that allows a non-Nigerian to reside in Nigeria and carry out a specific approved activity for two years.

## 4.4 Lagos Secure Anchorage Area (SAA)

On 23 January 2021 President Buhari, working in conjunction with the Nigerian Navy, terminated the government's contract with Ocean Marine Solutions Limited (OMS/OMSL) which has been in charge of operations, on behalf of the NN, at the Secure Anchorage Area (SAA) at Lagos Anchorage since 2012. The arrangement, in place since the administration of previous president Goodluck Jonathan, had vessels at the privately administered area waiting to berth at Lagos' ports paying a charge of up to USD2,000 per day. In exchange, the OMS provided a secure area with a 2NM Maritime Exclusion Zone (MEZ) in which vessels could anchor and/or conduct Ship-to-Ship (STS) operations under 24/7 watch by multiple armed private patrol boats. The OMS contract has been embroiled in controversy over recent years, with critics, including the Nigerian Ports Authority (NPA), accusing OMS owners and management of fraudulent and corrupt practices. Buhari reportedly reached his decision to terminate the contract following sustained pressure from senior administration officials.

Subsequently, all security operations in the SAA were handed over to NIMASA and the Nigerian Navy and all OMS security vessels left the anchorage area. Since the handover, the amount of reported criminal boardings and other piracy incidents within the Lagos Anchorage have significantly reduced, with no incidents recorded since January 2021, compared to nine incidents (eight criminal boardings and one suspicious approach) over the previous 12 months.

# Part 5 – Annexes

## 5.1. Risk Assessment and Personnel Protection Considerations

All vessels must carry out a risk assessment before entering the HRA. The risk assessment is to be carried out in accordance with BMP guidance and the Shipboard Security Plan (SSP) 6.2. Form S23 in the Ship Security Plan is to be used for this purpose. It is to be forwarded to the office, and agreed with CSO prior leaving last port before transit of the High Risk Area and shall include as a minimum:

| Maximum Information | Additional factors to be considered |
|---|---|
| • High Risk Areas to be transited and<br>• intended route.<br>• Identify whether the vessel is high risk; all vessels with less that 8 metres freeboard are deemed high risk.<br>• Identify whether a convoy is recommended; identifying the convoy and advise Owners accordingly.<br>• Full details of Ship Protection Measures and any additional equipment required. If armed guards onboard. | • Vessel Type<br>• LoA / breadth Freeboard<br>• Loaded or in ballast Cargo<br>• Full speed<br>• M/E attain > 90% MCR? Nos. of crew<br>• Nos. of supernumerary<br>• Nos. of cadets<br>• Nos. of females<br>• Reduce to non-essential staff?<br>• M/E confirmed OK?<br>• A/E confirmed OK?<br>• Boiler confirmed OK?<br>• Steering gear confirmed OK?<br>• Test of main fire pumps & emergency fire pump confirmed OK?<br>• Relevant drills performed on board?<br>• Master and officers of the watch have been familiarized with the impact of zigzag manoeuvres onboard and in particular the impact that these manoeuvres can have upon reducing the speed of the vessel?<br>• Engine room to be manned during the transit? SSAS test confirmed OK?<br>• North / South bound East / West bound<br>• Latest update of instructions on board?<br>• Latest edition of Best Management Practices to Deter Piracy (BMP) on board?<br>• SAT-C set to the “Indian Ocean Region”?<br>• Latest intelligence regarding piracy attacks and activity on board?<br>• Both citadel and safe muster point confirmed OK (if applies)?<br>• Communication (satellite phone and VHF) in citadel tested and confirmed OK? |

| | |
|---|---|
| | • All anti-piracy equipment on board (SPM)? |

All irregularities to above points shall be reported immediately to the Company. If any irregularities are observed the vessel must not proceed into the special precautionary area without agreement of the Company.

The overall aim of the risk assessment is to minimise the risk of attack and successful hijack. This is achieved through a combination of passage planning, Ship Protection Measures, a prepared crew and good communications between vessel and shore.

Risk assessments to be copied to piracy@vships.com

**Personnel Protection**
The Transit Guidance includes the recommendation to carry the following minimum equipment:

- 3 x Steel helmets
- 3 x Kevlar jackets
- 3 x Safety glasses

We do not expect the crew to participate in a fire fight with pirates, nor do we expect them to stand on the exposed bridge wings in broad view during an attack. It is our recommendation that in order to comply with the minimum protection equipment requirements stated above, Level III Helmets and Level IIIA Jackets should be supplied.

Typical costs for this body armour range between USD500 - 700 but will depend on the area of purchase, as will lead time due to import / export restrictions in some countries. Due to import restrictions, Djibouti is easier to supply than locations such as Salalah.

**Body Armour Standards as diagram below**
There are different national and international standards of body armour, including European EN 1063, German DIN 52290 Parte 2, and the US NIJ 0101.06 (copied below as an example).

## Table 4. NIJ Standard - 0101.06 P-BFS performance test summary

| Armor Type | Weapon Type | Test Round | Test Bullet | Bullet Mass | Conditioned Armor Test Velocity* | New Armor Test Velocity* | Hits Per Panel at 0 Angle | Maximum BFS Depth | Hits Per Panel at 30 or 45 Angle† | Shots Per Panel | Panel Size | Panel Condition | Panels Required | Shots Required | Total Shots Required |
|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|---|
| IIA | | 1 | 9mm FMJ RN | 8.0g (124gr) | 355m/s (1165ft/s) | 373m/s (1225ft/s) | 4 | 44mm (1.73in) | 2 | 6 | Large | New | 4 | 24 | 144 |
| | | | | | | | | | | | Small | Conditioned | 2 | 12 | |
| | | 2 | .40 S&W FMJ | 11.7g (180gr) | 325m/s (1065ft/s) | 352m/s (1155ft/s) | 4 | 44mm (1.73in) | 2 | 6 | Large | New | 4 | 24 | |
| | | | | | | | | | | | Small | Conditioned | 2 | 12 | |
| II | | 1 | 9mm FMJ RN | 8.0g (124gr) | 379m/s (1245ft/s) | 398m/s (1305ft/s) | 4 | 44mm (1.73in) | 2 | 6 | Large | New | 4 | 24 | 144 |
| | | | | | | | | | | | Small | Conditioned | 2 | 12 | |
| | | 2 | .357 Magnum JSP | 10.2g (158gr) | 408m/s (1340ft/s) | 436m/s (1430ft/s) | 4 | 44mm (1.73in) | 2 | 6 | Large | New | 4 | 24 | |
| | | | | | | | | | | | Small | Conditioned | 2 | 12 | |
| IIIA | | 1 | .357 SIG FMJ FN | 8.1g (125gr) | 430m/s (1410ft/s) | 448m/s (1470ft/s) | 4 | 44mm (1.73in) | 2 | 6 | Large | New | 4 | 24 | 144 |
| | | | | | | | | | | | Small | Conditioned | 2 | 12 | |
| | | 2 | .44 Magnum SJHP | 15.6g (240gr) | 408m/s (1340ft/s) | 436m/s (1430ft/s) | 4 | 44mm (1.73in) | 2 | 6 | Large | New | 4 | 24 | |
| | | | | | | | | | | | Small | Conditioned | 2 | 12 | |
| III | | 1 | 7.62mm NATO FMJ | 9.6g (147gr) | 847m/s (2780ft/s) | - | 6 | 44mm (1.73in) | 0 | 6 | All | Conditioned | 4 | 24 | 24 |
| IV | | 1 | .30Caliber M2 AP | 10.8g (166gr) | 878m/s (2880ft/s) | - | 1 to 6 | 44mm (1.73in) | 0 | 1to6 | All | Conditioned | 4 to 24 | 24 | 24 |
| Special | | - | Each test threat to be specifie by armor manufacturer or procuring organization. | | | | Armor performance and shot requirements shall depend on armor type. | | | | | | | | |

## 5.2. Ship Protection Measures (Guidelines)

Different vessels have different requirements, and the overall aim is to achieve the best solution for the individual vessel and transit. This will be identified pre-transit during the risk assessment phase. Before entering the High Risk Area, all anti-piracy measures and equipment shall be implemented and rigged. These anti-piracy measures must be applied throughout the transit of the High Risk Area. The vessel shall not depart the last port of call or anchorage prior to passage of the High Risk Area without agreement on Ship Protection Measures to be implemented.

| Equipment | Detail |
|---|---|
| **Sandbags**<br>• 150 bags with sand (approx. 15kg each) | The sandbags shall be used for a protective shelter in each of the bridge wings. |
| **Protection**<br>• 3 x Steel helmets<br>• 3 x Kevlar jackets<br>• 3 x Safety Glasses | The helmets and Kevlar jackets shall be used times by the watch keeping bridge team whenever suspicious vessels are sighted. |
| **Additional hoses**<br>• 16 x hoses 30 m<br>• x foam applicators with eductors 16 x 25 litres foam liquid<br>• 8 x fire main Y-pieces | Fire hoses and applicators shall be rigged, fixed and ready for immediate use throughout the High Risk Area.<br><br>The foam is a supplement to the already rigged water curtain as per BMP5 section p. 14. On vessels with separate foam line and foam pump this can be used instead of the main fire line and main fire pumps. It is important that the fire hoses cover midship sections of the vessel as well as vessel's quarters and stern. |
| **Razor wire and protective gloves**<br>• Sufficient concertina razor wire for two layers covering the full perimeter of the vessel (See diagram).<br>• Sufficient razor wire for rigging in strategic points around the accommodation<br>• Clips/wire ties for rigging above 12 x heavy duty gloves<br>• 2 x heavy duty wire cutters<br>• Silk wire or steel wire with a diameter of 3 – 4 mm | It is important that the razor wire is rigged in such a way that it covers the opening between the fish plate and the railing thus preventing any attackers from passing below the razor wire.<br><br>One layer of razor wire shall be rigged in a highly visible position outside the accommodation i.e. along the railing so it can be seen from small skiffs or boats. This layer of razor wire will have a deterrent effect on pirates (razor wire should not obstruct access to life rafts or lifeboat(s).<br><br>The silk wire or steel wire shall run through the centre of the coils of razor wire rigged in two layers covering the entire perimeter of the vessel from fore to aft. The silk wire or steel wire must run behind some of the railings vertical posts at regular intervals. |
| **Trailing Lines**<br>• 4 coils of cross braded floating PPP line, diameter 6 mm and | Trailing lines can be deployed from the stern of the vessel and forced down to the surface by attaching two 20 litres plastic cans to each line (see diagram). |

| | |
|---|---|
| length 220 meters | |
| **Night vision binoculars**<br>• 2 x pairs | |
| **Dummies / artificial lookouts** | Ref BMP5 section p. 11 well-constructed dummies / artificial lookouts must be made and placed at strategic locations around the vessel giving the impression of greater numbers of people on watch. |

**Use of Foam**

- In addition to the effects of a standard hose, the use of a foam or dye mix has the following effects:
    - Ox blood or urine additives used to produce foam are particularly unpleasant for anyone who is covered by the foam – foul smell, sticky, irritant to eyes and respiratory systemsThe use of dye markers could assist in subsequent prosecutions. Where an attack has been unsuccessful, but a subsequent boarding of a suspected pirate skiff takes place, the naval forces could possibly link the pirates to the attack if they detect the presence of non-soluble dye markers
    - A small skiff will become unmanageable more quickly if it is filled or swamped with foam rather than just water
    - A pirate covered in foam will find it significantly more difficult to climb a ladder to board a vessel

**Warning on Use of Active Measures**

Advice on the use of active counter piracy measures, including use-of-force should be sought from company management and the Flag State authorities.

A ship's Master may be subject to legal proceedings following the use-of-force causing harm to a pirate. Using active measures against pirates may cause injury or harm pirates and may result in an escalation of violence against the vessel. If an attack is successful, the pirates may later take revenge against the crew for any injuries caused during the attack. Care must be exercised when weighing up all options especially when considering the use of force against pirates, before and during an attack. Any force used must be appropriate to the threat, reasonable in the circumstances and justifiable in a court of law at a later time.

**Water Curtain / Flooding of Main Deck by Ballast Water Pumps or Main Fire Pumps**

Ref. BMP5 p. 14, a water curtain should be established using a ballast pump. On vessels with separate foam line and foam pump fire hoses, main fire pumps can be used as well. It is important that the fire hoses cover midship sections of the vessel as well as vessel's quarters and stern. Foam is to be used as a final deterrent on deck. Only the extra foam supplied as part of SPM kit is to be used.

**Manoeuvring Practice**

Ref. BMP5 p. 12 "Manoeuvring Practice" the Master and officers of the watch shall be fully familiar with the impact of zigzag manoeuvres onboard and in particular the impact that these manoeuvres can have upon reducing the speed of the vessel.

If the vessel comes under attack, evasive manoeuvres such as turning the vessel into the wind, provided they do not significantly slow the vessel, should be considered. Forcing the skiffs into the wind and swell has proven effective in hampering attacks.

**LRIT Policy**

The LRIT shall remain in operation at all times.

**SAT-C**

The SAT-C must be on “Indian Ocean Region” to ensure the vessel receives urgent piracy alerts and warnings.

**Navigation Lights**

At night, navigation lights shall be exhibited in accordance with the COLREGS. All deck lights and searchlights shall be utilised when an attack is evident.

**Training**

A training module entitled “Anti Piracy Awareness” has recently been sent to all vessels. All crewmembers must view this as part of preparation for entering High Risk Area. Drills must be held prior to entering the High Risk Area.

**Gas Cylinders**

Pressurized cylinders, including any spare medical oxygen cylinders from the hospital, shall be placed in the purpose build locker. Excess gas bottles and flammable materials shall be landed prior transit.
Lockers can be protected with sand bags.

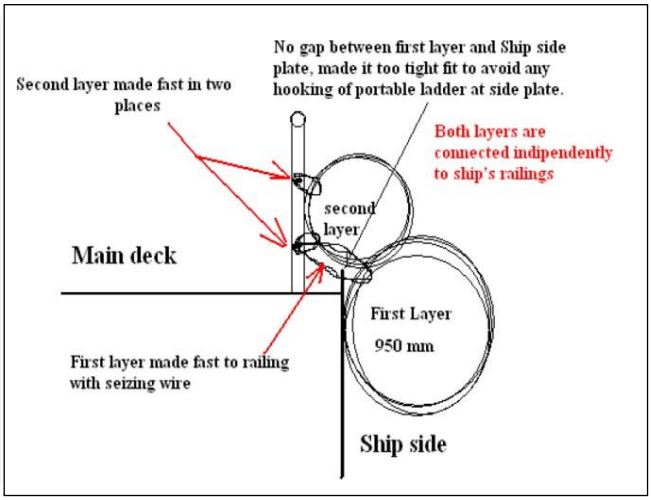
**Guidelines for Fitting Razor Wire**

This guideline is intended to assist the vessel’s crew in fitting razor wire efficiently, safely, and durably. When fitting the razor wire it is important that the crew is wearing helmet, safety goggles, safety shoes, and heavy duty gloves (e.g. welding gloves).

The razor wire must be attached to the railing pipes by 3mm galvanized wire or heavy-duty cable ties (with steel). Distance between each attachment point should not exceed 50 cm.

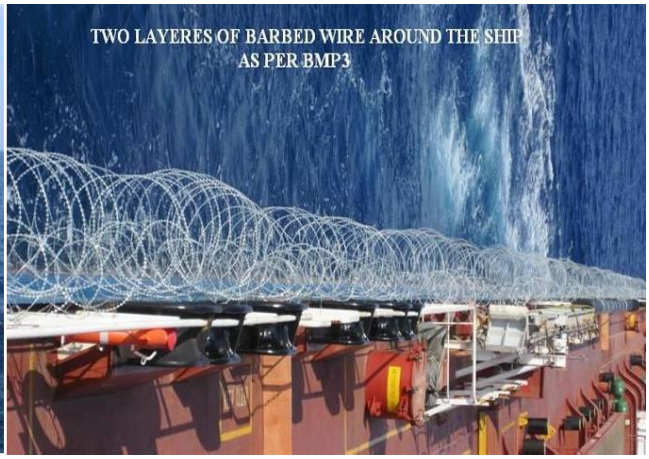
It is recommended to fit two layers (see below) with the first layer being the Concertina razor wire. Thereby the vessel is still secured even if the first coil is ripped down. It has been reported that pirates in a few incidents have succeeded in ripping down the razor wire by hooks – therefore care must be taken when attaching.

The wire must be detached as soon as vessel has left the High Risk Area. After dismantling the wire must be washed thoroughly in fresh water and stowed sheltered on hangers or similar.





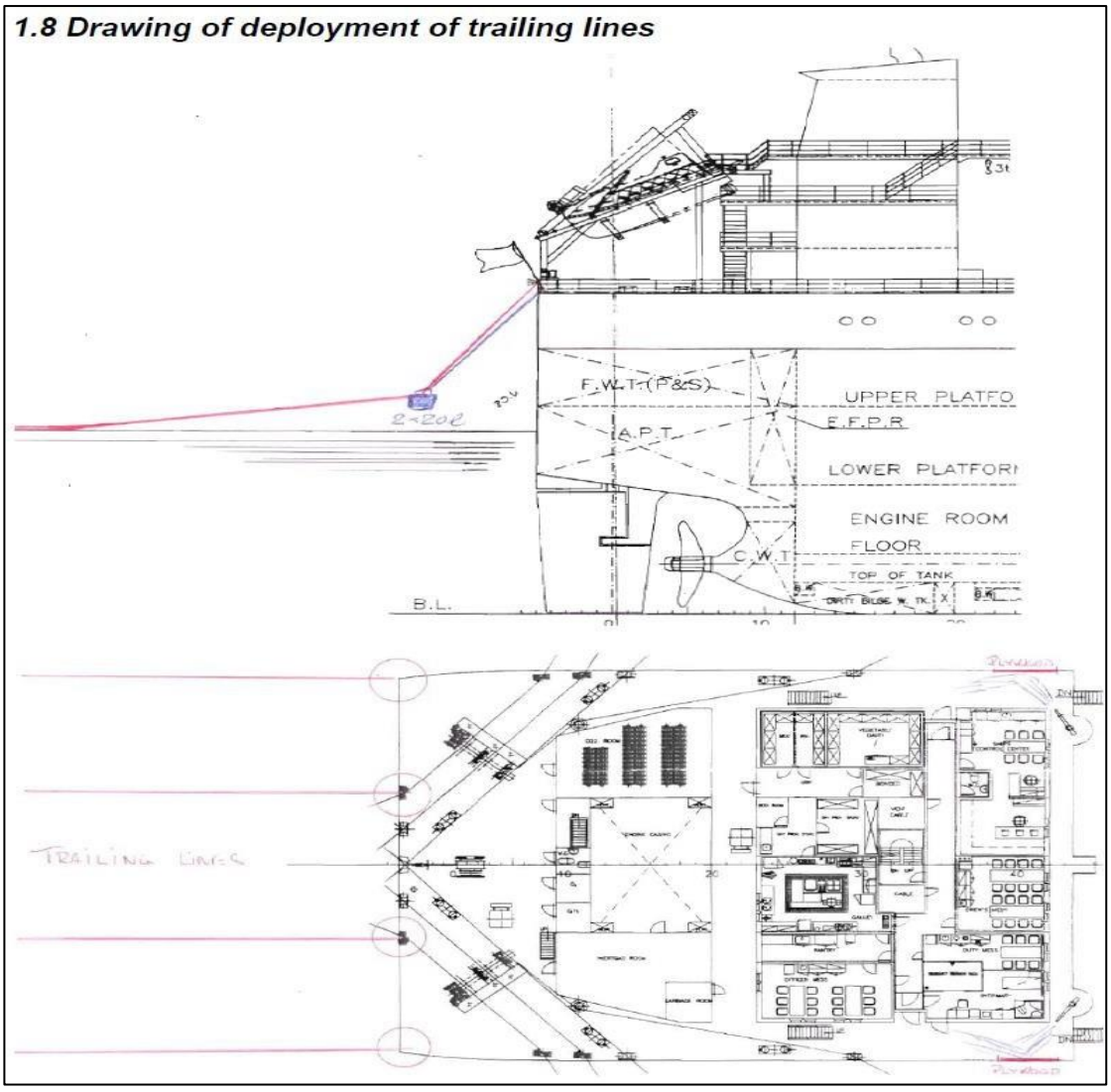


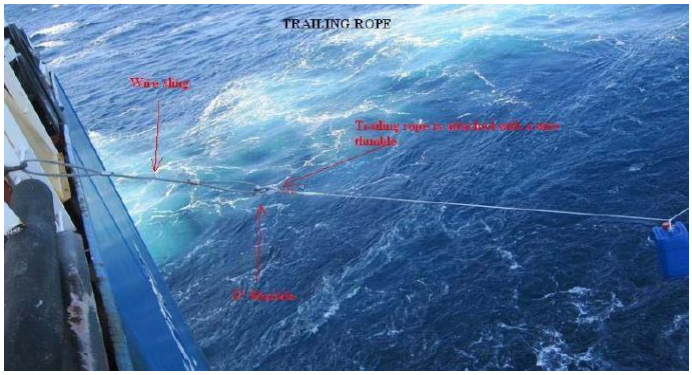



It is important that the silk wire or steel wire run through the centre of the coils of razor wire and that it is positioned behind some of the railing's vertical posts at regular intervals. The combination of the attachment points and the silk or steel wires make it very difficult to tear down the wire even if grappling hooks attached to ropes are being used.

**Guidelines for Trailing Lines**

**1.8 Drawing of deployment of trailing lines**



## 5.3. Citadels and Safe Muster Points

Citadels are complementary to the other ship protection measures set out in BMP. It is the responsibility of owners, operators and masters to decide and implement their policy in relation to the use of citadels. The CSO will advise the Master on owner's policy.

**Safe Muster Points**

Muster Point: a safe area within the accommodation that all crew should muster to in the event of an approach by a suspicious craft. In many cases the bottom of the central stairwell appears to be the best option but in any event would have to be carefully considered on a case by case basis.

Citadel: A designated pre-planned area purpose built into the vessel where, in the event of imminent boarding by pirates, all crew will seek protection. A citadel is designed and constructed to resist a determined pirate trying to gain entry for a fixed period of time.

**Introduction**

Although the citadel may be considered the final safe haven, and should protect against determined intrusion, including a limited ballistic attack, the citadel rationale should be part of a layered level of security, where approaches to the citadel are effectively protected. The predetermined time period will be determined by a risk assessment, dependent upon the vessels trading patterns, construction, and needs.

**Aim**

Should the vessel owner /operator, following a thorough risk assessment, and having exhausted all other measures of self-protection as detailed in BMP5, conclude that a citadel is required, this guidance describes the construction and use of a citadel, in order to provide effective protection against determined intrusion.

These Guidelines do not attempt to recommend or endorse the construction/use of a Citadel but aim to present the relevant facts to enable the vessel owner/operator to reach a reasoned conclusion as to whether or not to utilise a citadel.

**Experience to Date**

Although the number of cases of citadel use is limited, experience to date has revealed the following important information on their use:

- Once the pirates manage to board a vessel they will generally try to make their way directly to the Bridge – usually accommodation doors are locked and the external stairways offer an easier route. Any delaying tactics by blocking access is useful since it will give the vessels crew more time to secure the Citadel and its approaches

- Once access to the Bridge has been gained, the pirates will then systematically search through each cabin and locked compartment gaining access by utilising small arms fire or any other equipment that they may find on board such as crowbars, fire axes etc.
- Attempts have been made to smoke out the crew from a Citadel, by setting fire to the Bridge and/or accommodation
- Pirates have been known to force hinges, and to use mechanical tools such as disk cutters (if found on board), to breach compartments. They have also attempted to pull off doors
- Pirates have been known in the past to use ruse and trickery in an attempt to coerce the crew into voluntarily exiting the citadel

**Risk Assessment Determining Whether to Utilise a Citadel**

Any decision to utilise a citadel should be based upon a thorough Risk Assessment, which should be conducted on a ship-by-ship basis. There should be clear guidance and advice given by Management to Masters and senior officers carrying out the Risk Assessment on the location, construction, and other necessary requirements of a citadel.

The Risk Assessment should consider but is not limited to;

- Physical size, speed, and vulnerability of the vessel
- The ability to meet the Citadel criteria (as set out below)
- Geographical trading area including consideration that the Naval/Military forces may not be able to offer assistance
- That all other avenues of self-protection based upon Best Management Practices have been effectively implemented
- The potential consequences of an escalation of the situation

**Citadel Criteria**

If the Risk Assessment determines that a citadel is required, consideration should now be given to the following;

- Location of the citadel
- Time frame for citadel survivability
- Construction of the citadel
- Use and operation of the citadel
- Naval/Military forces response / assistance

**Citadel Location**

Vessels differ greatly in size and construction; therefore, it is not possible to consider all potential locations of a citadel within this document. However, the following factors should be considered:

- The location should be difficult for pirates to locate. It is also helpful if the entrance to the citadel is camouflaged
- The compartment should be able to be fully secured from all entrances including hatches and vents
- It is important that all six sides of the compartment are taken into account when considering the security and potential vulnerability of a space
- As a minimum the compartment must have the ability to deny the pirates access to the vessel's propulsion. Ideally, full control of the propulsion and the vessels essential systems, together with the ability to navigate, should be possible from the compartment
- Accessibility to the compartment, and time taken in order for it to be effectively secured
- In some cases the construction of the vessel may dictate that the citadel requires a means of escape. If so, then this should be well concealed and the vessel should have detailed procedures as to its intended use in a citadel scenario
- Habitability of the compartment being suitable for the vessels crew, including size and ventilation
- The thickness and the fire retarding nature of the six sides of the citadel should be kept in mind while determining the location of the citadel including, if necessary, the ability to easily reinforce this

**Citadel Construction**

Factors to consider for the construction of the citadel include:

- Ensuring that all access to the citadel and the approaches are secure against a sustained physical attack. This includes doors, locks, hatches, portholes / windows and ventilation grilles
- Pirates have been known to attempt to gain access to citadels by forcing locks, by removal of hinges and by pulling off a door utilising ships tools. Hinges to any door should be internal, and the door itself should provide a smooth external surface in order to prevent the pirates from taking the opportunity to attach any tools to pull the door off. This may have the added advantage of offering a camouflaged entrance
- In light of the pirates having been known in the past to try and smoke out the crew, ventilation of the compartment should be considered. In this respect the ventilation should be from a stand-alone power supply, and should provide adequate ventilation for the vessel's entire crew particularly if citadel procedures involve the vessel "blacking out". The inlet for this ventilation should, where possible, be concealed
- Where a compartment is not watertight, and may be susceptible to accelerants such as gasoline, the use of a simple plastic sealant may negate this threat
- A means of fire suppression within the citadel is considered as essential to protect the crew
- Portable extinguishers may offer the simplest solution but there must be sufficient available to deal with the assessed threat
- Dependent upon the actual location of the citadel, if the compartment is protected by a toxic fixed firefighting system, then it may be advisable to have a means in place to temporarily isolate the system from the citadel itself. Another consideration might be to ensure that the citadel has the ability to activate a fixed firefighting system, such as a water fog fire suppression system, to protect both the Engine Room

and the accommodation

- Doors, bulkheads, and glazing may be given additional protection against an attack with weapons. The materials used should be “ballistic resistant” to an internationally recognised standard. The more common ballistic standards are discussed in the Annex to this document

**Materials**

The type and thickness of the materials used in a citadel or its approaches will very much depend upon the level of protection that is required and if it’s required to be ballistic resistant or not, for which specialist advice would be required. The advice here should mention that the thickness of the material will be such as to defeat a typically AK47, utilising 7.62mm ammunition. It should be noted that non- ballistic materials will generally be thicker, and thus heavier, although will likely be far cheaper. On the other hand, a ballistic solution will be lighter, much thinner and in some cases portable – however costs will inevitably be higher for ballistic grade materials. Thus, in discussions with specialist advisers, the requirements for the citadel materials should be as specific as possible.

- *Ballistic resistant doors* - These are specifically designed to provide ballistic protection, may be supplied in either wood or steel, and usually come as a complete unit consisting of both door and door frame. It can be seen therefore that careful consideration is required as to fitting a complete unit, since strength of the adjacent bulkhead structure needs to be taken into consideration
- *Ballistic resistant panels* - Ballistic resistant panels may be straight steel plate, a composite type consisting of an aggregate between two steel plates, a ceramic composite, or a fibreglass composite material. In general the steel panels will be cheaper but weigh considerably more than other options. They are also more cumbersome to fit, but both composites and fibreglass, although thicker, are easier to work with and may be cut to size in situ, thus offering a realistic option for existing vessels to modify a compartment to their requirements. As with glazing and doors, the panels should be certified to a certain ballistic standard, this being dependent upon identified needs for the Citadel
- *Bullet resistant glazing* - There are several types of bullet-resistant glazing, the most common being Laminated Glass, Acrylic, Polycarbonate, and Glass Clad Polycarbonate. It should be noted that Acrylic and Polycarbonate are only suitable for indoor use. Where this is not possible due to size, then reinforcement of the glazing with steel plate may afford an effective solution

**Citadel Equipment**

Consideration should be given to installation of the following equipment for use within a citadel;

- *Communications* - The provision of communications is essential to the citadel; without guaranteed communications there can be no consideration of military intervention. The Master must be able to communicate to the outside world that he and all of the vessel’s crew and personnel on board are safe. A two-way satellite communications system is recommended, powered from an independent source on board with the ability to provide communications for at least three days on an open line, as a minimum. Pirates have been known to target antenna in order to disrupt communications and therefore it is preferable to keep cabling and the antenna concealed where possible. The effectiveness of the communications should be thoroughly tested particularly with a concealed

antenna arrangement

- *Contact list* - An up-to-date list of key contact numbers should be prepared and left within the citadel space. This should include UKMTO, MSCHOA, Company Owners, Managers, Operators and Charterers. There should be procedures in place ensuring that the list is regularly reviewed / updated as required
- CCTV – The use of CCTV monitoring equipment serves several purposes. Primarily it can give the vessel's crew knowledge of the whereabouts and activity of pirates on board and can be used as
- evidence for any future prosecutions. The CCTV should have the ability to operate via a stand-alone power supply
- *Navigational aids* - In order to provide the ability to navigate towards a Military/Naval force, the routeing of a GPS or even a slave radar feed to the citadel may be beneficial (e.g. a feed from the VDR to a computer)
- *Medical supplies* – Additional medical supplies over and above standard medical equipment carried on board should be considered, together with an emergency trauma kit to assist with ballistic wounds
- *Other considerations*
    - Food and water - Sufficient supplies of long life food and water – the standard is often stated to be sufficient for a minimum of five days, though this varies
    - Crew list – It is recommended that a copy of the vessel's up to date crew list and all personnel on board is kept within the citadel - this will ensure that all personnel and crew are fully accounted for in the event of a Citadel retreat being ordered by the master
    - Grab bag – This may be made available with sundry essentials such as torches, spare batteries, and portable VHF Radios
    - Toilet - For a prolonged period in a citadel, toilet facilities become a consideration - a portable chemical toilet may be installed where no standard WC is available.
    - Bedding material - Blankets or sleeping bags should be provided, which in addition to their primary purpose, will provide some comfort against a metal deck.

**Use of Citadels**

The intended use of the citadel should be considered during the Risk Assessment and planning phase – the following points might be considered;

- The intended use of the citadel may differ in varying geographic locations, for example, is the citadel intended for use in the GoA/MSTC area, in the wider Indian Ocean/Somali Basin, or both?
- Both the company and the vessel should have procedures regarding the use of the Citadel in place that are fully understood by all parties. The exact time that the citadel is to be utilised should also be carefully considered, bearing in mind that all defensive measures must prevent the pirates boarding. The time to utilise the citadel could for example be; once the pirates are on board, or once a ladder has been successfully deployed and there is no way that a boarding can be prevented. Procedures should be absolutely specific in determining this point, since in turn, this will determine how long it will take a vessel to secure an effective „lock down"
- As the citadel is being manned all other compartments should be locked, and all approaches to the citadel secured

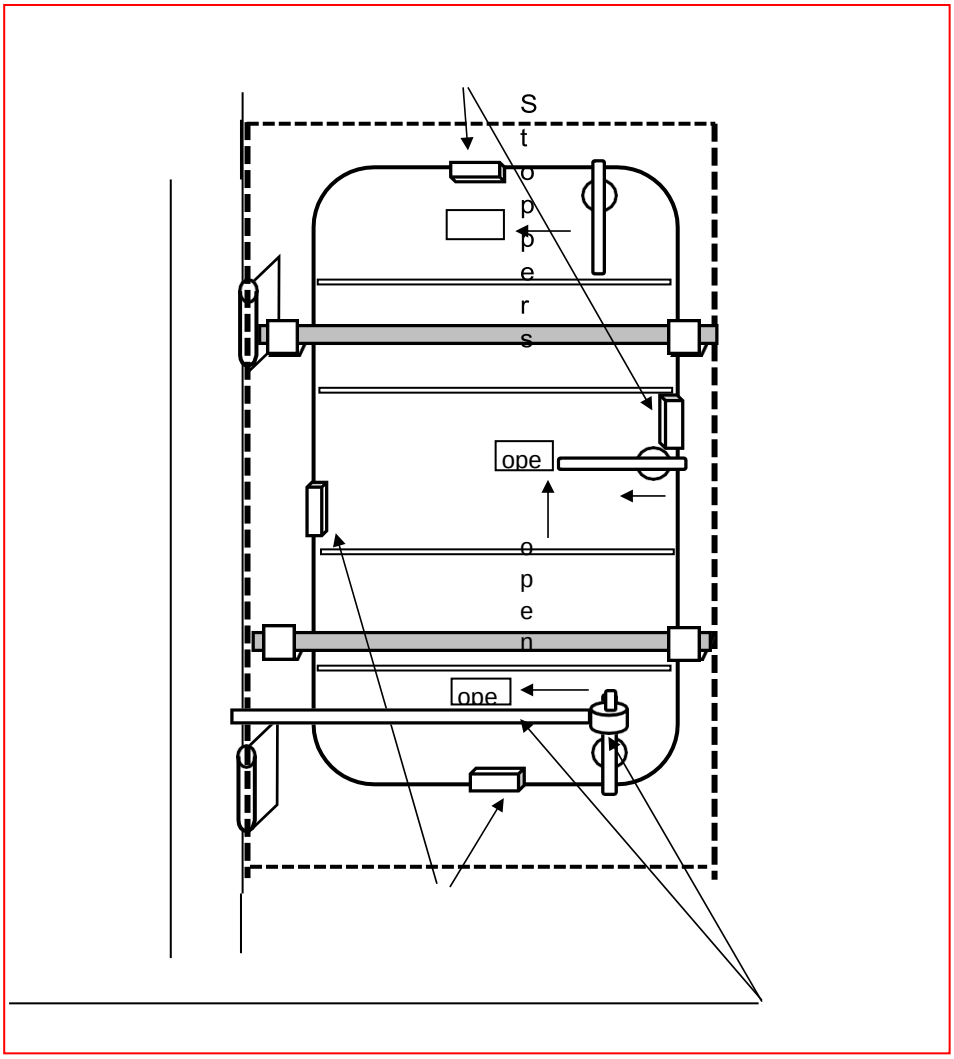
- Consideration will have to be taken as to the exact use of the citadel should the vessel have a Security Team on board. The citadel will only be effective if all crew, security teams and personnel onboard embarked for the passage are secured within the citadel
- The use of a password system whereby the master will only exit the citadel upon an agreed verbal signal is recommended. The agreed password should only be exchanged via secure communications, (satellite phone), and it is recommended that the password exchange is known by both the company and the vessel. This ensures that the Naval/Military forces can be made aware of the password(s) and equally importantly ensures that any misinformation by the pirates over the VHF can be ignored
- If a citadel is to be considered, then it is essential that the pirates are denied access to the vessel's propulsion in order to ensure that the vessel cannot be sailed off by the pirates themselves. While it may be impossible in the majority of existing vessels, it may also be considered advantageous to be able to safely manoeuvre and control the vessel from inside the citadel. In many cases involving use of a citadel, the vessel has simply stopped and "blacked" out with the crew safely gathered inside the citadel
- A complete lighting blackout (with the exception of the citadel) has also proven to be an effective delaying tactic
- The importance of training if a citadel has been utilised cannot be overestimated. The crew will need to drill exactly what to do, when to do it, and become fully familiar with their role, and the alarms / signals involved. The whole concept of a citadel is lost if any member of the crew is left outside before the citadel is secured
- There have been cases where the pirates have used hostages from a mothership and ordered them to attempt to gain access to the citadel of another vessel. Bearing in mind that the pirates may threaten the hostage with their life, the company is advised to have a specific procedure in place to allow for this eventuality, and the vessel should be instructed in the appropriate response
- The company should have procedures in place detailing a scenario where the Naval/Military forces are unable to respond, and the actions required of the crew in this situation. These may include the following:
- If the pirates are on board, the length of time of a stand-off should be considered. The possibility that the pirates may become increasingly desperate should be taken into account
- If there is reason to believe that the pirates have left the vessel, the length of time before the Citadel is opened, the number of personnel permitted to investigate, and further actions if it is discovered that the pirates are still on board, should all be considered. The use of CCTV where possible may prove to be invaluable

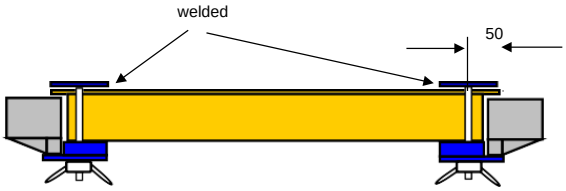
**Military Considerations**

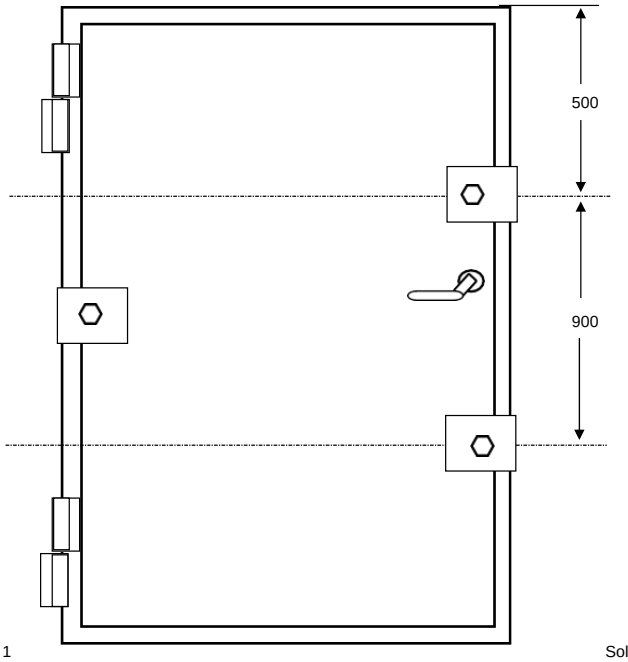
Having a citadel does not guarantee a Naval / Military force response. The following are current requirements prior to any Naval / Military force intervention. The latest guidance may be found on the MSCHOA website – www.mschoa.org and the NATO Shipping Centre web site www.shipping.nato.int

- All of crew, security teams and personnel on board embarked for passage must be secured in the citadel

- The crew of the vessel must have self-contained, independent, two-way external communications. Sole reliance on VHF communications is insufficient
- The pirates must be denied access to propulsion
- The location of the vessel that has been boarded illegally in relation to the naval vessel. In addition to any geographic limitations between the two vessels, some naval assets have a strict area of operations which are imposed upon them – they are not permitted to use force outside of this area
- In many cases the Naval / Military force is required to have a specially trained team on board to enable an “opposed boarding” to be conducted
- The Naval / Military forces may have to obtain approval for an opposed boarding from the Flag State of the vessel to be boarded and from the foreign ministries of all nationalities on board
- Weather considerations may prohibit an opposed boarding
- Any opposed boarding takes time to plan and requires assistance from the Owners/vessel Operators
- Owners should have / keep ship plans available to send to the military in suitable electronic format

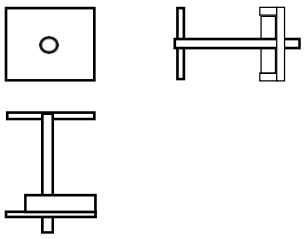




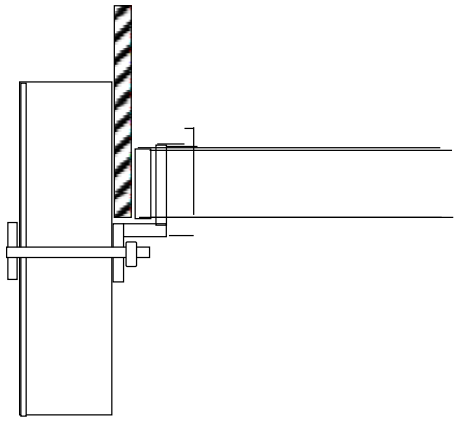




Solution 1

3pcs steel plate 100 x 100 x 4 mm
with 12mm diameter steel bolt 110mm length, 40mm threaded, welded on plate.



Solution 2



Extra strengthening on at risk doors before the citadel

As above – a further deterrent to access should the lock be broached (metal is preferred to wood)

Watertight door effectively secured

## 5.4. CSO Procedures

- It is company policy that each vessel transiting the GoA area should use the MSTC. The decision on whether or not to join an escorted company is to be made at the risk assessment stage and the CSO is to advise the Master regarding naval convoy schedules and group transit procedures
- Every transit must be planned individually and a risk assessment completed. Latest piracy reports should be reviewed and the areas of highest risk identified. Latest information can be found on UKMTO on following link: www.ukmto.org. Using this information, a voyage plan can be agreed. THIS MUST BE REVIEWED ON A REGULAR BASIS WHEN A CSO HAS VESSELS IN THE HIGH RISK AREA
- The CSO shall advise the Master regarding the company's POLICY FOR MANAGED VESSELS TRANSITING THE INDIAN OCEAN PIRACY RISK AREA and shall advise the Owners accordingly
- The CSO shall agree the adequacy of the vessel's risk assessment and communication plans
- The CSO shall co-ordinate with the vessel's Superintendent to ensure all equipment required to implement the ship protective measures within this policy are supplied to the vessel
- In the event that armed guards are to be carried the CSO is responsible for ensuring that Flag and other interested parties are notified. Some charterers do not currently permit armed guards
- The CSO will liaise with the Owner regarding policy on Citadels and advise the Master accordingly
- The CSO must ensure that insurance warranties are complied with and notifications made to insurers. He should be aware if K&R insurance is in place and the conditions of the policy
- CSO will register the vessel's transit through the GoA transit corridor and the Indian Ocean High Risk Area where applicable, via the MSCHOA website (www.mschoa.org). CSOs must be registered for access to this site and should have contact details in phone address bookpostmast. The process can also be done offline by requesting a form from postmaster@mschoa.org
- UKMTO e-mail address (watchkeepers@ukmto.com) shall be added to the SSAS security alert transmission for the period in the High Risk Area. Where considered necessary the Ship Security Reporting System www.ssrs.org shall be utilised
- The CSO shall appraise the vessel with transit guidance regularly, including security updates
- Any additional security equipment or personnel considered, especially for high risk vessels, should be agreed with owners
- The CSO shall call the vessel at regular pre-arranged times when within the MSTC to check on the vessel's status

# Annex A Threat Terminology

The report's findings are predictive and estimative. To communicate these findings clearly and in order to accurately compare threat levels, the report uses a variation of terminology used by the UK Foreign and Commonwealth Office (FCO).

| THREAT LEVEL | DESCRIPTION |
|---|---|
| **Critical** | The likelihood of an incident is **certain** |
| **Severe** | The likelihood of an incident is **almost certain** |
| **Substantial** | The likelihood of an incident is **probable** |
| **Moderate** | The likelihood of an incident is **about even** |
| **Low** | The likelihood of an incident is **improbable** |

**Piracy:** Crisis24 uses a modified version of the definition of piracy adopted by BMP5. For the purposes of this report, the term 'piracy' includes all violent and non-violent acts against vessels, her crew and cargo occurring either in internal waterways, territorial waters or deep offshore. Based on this definition, Crisis24 classifies piracy incidents into six categories:

- **Hijacking**: Crew lost control of the vessel and / or pirates kidnapped at least one crewmember and / or passenger(s)
- **Boarding**: Pirates successfully board a vessel with the intent to hijack it but their attempt to take control of the vessel or kidnap crewmember(s) and / or passenger(s) failed
- **Attack**: Vessel was attacked with gunfire or RPG fire, no boarding was successfully completed
- **Pirate Action Group (PAG)**: Sighting or reporting of firearms and boarding equipment on board a suspicious vessel or sighting of a confirmed pirate mothership
- **Criminal boarding**: Vessel boarded with criminal intent, theft does not have to occur
- **Suspicious approach**: Suspicious activity reported (i.e. a vessel was approached by unidentified skiff(s) with one or more persons on board)

## Limitation

Our opinion and advice are given on the basis of the information given to us in our instructions and the surrounding circumstances known to us to exist at the time when those instructions are given. We do not accept responsibility for verifying the information or investigating beyond its limits. Subsequent changes to relevant information or to the surrounding circumstances may affect the reliability of our opinion and advice but we do not accept responsibility for that effect. We do not accept responsibility for the outcome of action taken or not taken as a result of our opinion and advice unless the possibility of that action being taken or not taken is set out in specific terms in our instructions.