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Circular Letter No.3606
2 December 2015

To: All IMO Member States

Subject: **Revision to coordinates of the High Risk Area (HRA)**

1 The Secretariat would like to draw the attention of IMO Member States to the correspondence dated 1 December 2015, from the Industry co-sponsors of the Best Management Practices for Protection against Somalia Based Piracy (BMP 4), as set out in the annex, informing of the revisions to the High Risk Area (HRA), including the revised coordinates of the HRA.

2 Member Governments are recommended to bring this circular letter to the attention of all national agencies concerned with anti-piracy and anti-armed robbery activities, shipowners, ship operators, shipping companies, shipmasters and crews.

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Mr Koji Sekimizu
Secretary General
International Maritime Organisation
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1 December 2015

Dear Secretary General,

INDIAN OCEAN PIRACY HRA

ICS, on behalf of the co-sponsors of BMP are pleased to present the findings of their recent risk assessment on the extent of the High Risk Area (HRA) which are at the Annex to this letter. The revised HRA, and its accompanying guidance, has been developed taking into account risk assessments and discussions at the ninety fifth session of the Maritime Safety Committee and the fourteenth session of the Contact Group on Piracy off the Coast of Somalia and has resulted in an amendment to Section 2 of BMP4.

The undersigned have agreed that the current HRA should be reduced in area to reflect the recent experience of ships in the Indian Ocean as well as all available data provided by military headquarters. The changes are effective as of **1 December 2015**.

The revised area acknowledges the variable nature of the piracy risk in the region as highlighted by the SHADE threat assessment and recognises the vital contribution of military counter-piracy forces, whilst at the same time trying to ensure that awareness and self-protection by merchant ships endures. The importance of reporting to UKMTO and registering with MSCHOA, and the fundamental necessity of pre-voyage risk assessment is emphasised in the changed definition.

Furthermore, the HRA is now reconfigured to new coordinates recognising the concerns of littoral States; and designating an area in which merchant ships should apply the appropriate self-protection measures.

The BMP Co-authors believe that this revision reflects the dynamic nature of the piracy risk in the region and of BMP itself. It should be underlined successful counter-piracy activity depends upon the continuation of several pillars of support provided by political and military action and the actions of the merchant fleet. The changes are likely to affect existing IMO Guidance, in particular MSC.1/Circ.1506 and MSC.1/Circ.1339, and consequently you may wish to forward

the document to the Subdivision for Maritime Security and Facilitation for their consideration. We will gladly commit the necessary resources to any work that arises as a consequence of these changes.

Yours sincerely,

A handwritten signature in black ink, appearing to read "P. Hinchliffe". The signature is fluid and cursive, with the first letter of each word being capitalized and prominent.

Peter Hinchliffe
Secretary General

Somali Pirate Activity

The High Risk Area

2.1 The High Risk Area (HRA) is an area within the UKMTO designated Voluntary Reporting Area (VRA) where it is considered there is a higher risk of piracy and within which self-protective measures are most likely to be required. For the purpose of BMP the High Risk Area is an area bounded by:

In the Red Sea:	northern limit: Latitude 15°N
In the Gulf of Oman:	northern limit: Latitude 22°N
Eastern limit:	Longitude 065°E
Southern limit:	Latitude 5°S

It should be noted military threat assessments provided by SHADE indicate that the risk from Somalia-based pirates operating at range cannot be completely discounted and an increased state of readiness and vigilance may therefore be required within the VRA in accordance with individual ship voyage risk assessments which remain the cornerstone of this guidance.

2.2 It is important the latest information on the location of where pirates are operating is obtained from MSCHOA & UKMTO prior to completing the voyage risk assessment. (See contact details at Annex A) and before entering the VRA. It is also important vessels are prepared to alter course at short notice to avoid pirate activity when information is provided by NAV WARNINGS and/or Naval/ Military forces. Weather can also constitute an obstacle to pirates and can be considered a factor when planning a route through the Voluntary Reporting Area and High Risk Area itself.

2.3 It is strongly recommended that effective BMP measures are implemented as and where the risk assessment indicates their necessity.

Supporting Guidance

To avoid confusion the following guidance is offered on the implementation of BMP in light of the geographic change to the HRA as defined in BMP 4:

- The three fundamental requirements of BMP – Register at MSCHOA, Report to UKMTO, Implement SPMS remain unchanged;
- The pre-transit risk assessment in accordance with section 3 of BMP 4 remains essential to the safety of a ship and its crew;
- Military Threat Assessments through SHADE indicate pirates are capable of attacking at range.
- The pre transit risk assessment should therefore consider both the situation in the VRA as well as the HRA, taking into account current advice from UKMTO, MSCHOA, Coastal States and relevant NAV warnings;
- The MSCHOA Vessel Registration area remains **unchanged** and is still bounded by the Strait of Hormuz and Suez to the North, 10S and 78E. All Vessel movements should be registered with MSCHOA, even if the vessel **does not** enter the modified HRA.
- Any reference in BMP4 stating that a Vessel should register with MSCHOA prior to entering the HRA is now superseded by the bullet above.
- There is only a requirement to register with MSCHOA once.
- The output of the Risk Assessment will determine what appropriate self-protective measures are required and when and where they should be applied. It should be noted that SPMs are likely to be required in the HRA for most vessels.
- The table below provides guidance on the specific application of actions by the Company and Ships master in the VRA and HRA in accordance with the new definition.

Action	VRA	HRA
6.1 – Register Ship with MSCHOA Website	YES	YES
6.2 – Obtain Latest information from the MSCHOA and NATO Shipping Centre websites	YES	YES
6.3 – Review the SSA and SSP	YES	YES
6.4 – Put SSP in place	As Required	YES
6.5 – Monitor piracy related websites on specific threats	YES	YES
6.6 – Offer guidance to Master with regard to the recommended route	As Required	YES
6.7 – Plan and install Ship Protection measures	As Required	YES
6.8 - Conduct crew training	As Required	YES
6.9 – Submit “vessel Movement Registration Form” to MSCHOA	YES ¹	YES

Company Planning

Ship Master’s Planning

Action	VRA	HRA
7.1 – Brief crew and conduct drill	YES	YES
7.2 - Prepare and Emergency Communication Plan	YES	YES
7.3 – Define the ship’s AIS policy	YES	YES
7.4 – If Company has not submitted “Vessel Movement Registration Form” to MSCHOA	YES.	YES
7.5 – Upon Entering submit “Vessel Position Reporting Form” – Initial report to UKMTO	YES	YES
7.6 – Reduce Maintenance and engineering work to minimum	As Required	YES
7.7 – Daily submit “Vessel Position Reporting Form – Daily Position Report” to UKMTO	YES	YES
7.8 – Carefully review all warnings and information	YES	YES
7.9 – Use IRTC Group Transit Scheme while transiting through Gulf of Aden	Not Applicable	As Required
7.10 – Make Adjustments to passage plans to conform to MSCHOA advice	YES	YES
7.11 – National Convoys	Not Applicable	As Required

¹ As advised by MSCHOA