18 December 2020

To: All Masters of Hong Kong registered ships, Hong Kong Ship Managers and Hong Kong Ship Operators, Hong Kong Shipowners

Ship Operators Security and Quality Advisory No.64

<u>Disabled Automatic Identification System (AIS) on board Hong Kong Registered Ships</u>

In a recent investigation, we revealed a HK registered ship has disabled automatic identification system (AIS), or "going dark".

<u>International Convention and Guidelines</u>

2.　　All Hong Kong registered ships shall strictly comply with the Merchant Shipping (Safety) (Navigational Equipment and Safety of Navigation) Regulation, which gives effect to the SOLAS Reg.V/19, to maintain AIS in operation at all times.　According to IMO resolution A.917(22) - guidelines for the onboard operational use of shipborne AIS ("guidelines"), if the master believes that the continual operation of AIS might compromise the safety or security of his/her ship, the AIS may be switched off.

3.　　The master **does not** have any discretion to switch off AIS due to commercial consideration. And even he/she switches off the AIS for safety or security consideration, the actions and reasons shall always be recorded in the ship's logbook.

<u>BMP 5 (Industrial Guidelines)</u>

4.　　We notice that some companies may rationalize the disablement of AIS in High Risk Areas (HRAs) or Voluntary Reporting Areas (VRAs) as concurring with BMP5.　As a matter of fact, the general recommendation in BMP5 is to maintain the AIS switched on when operating in piracy prone areas.　More specifically, ships are advised to leave their AIS transmission on throughout any and all areas of risk but configure it to transmit only

restricted data, such as the ship's identity, position, course, speed, navigational status and safety-related information. Maintaining the AIS switched on throughout passages in HRAs and VRAs will also ensure that reporting centres and militaries can track the ship and provide early assistance in the event of a suspicious approach or attack.

Consequences

5.   Besides safety and security concerns, switching off AIS transmission may also imply the ship's involvement in illicit operations and trigger alerts under various international, regional and national surveillance mechanisms. The Hong Kong flag administration takes it seriously to prohibit "dark activities". Any confirmed case may lead to the closure of ship's registration and the cancellation of HK DoC of the ISM company.

6.   Should you have any queries, please do not hesitate to contact the Quality Assurance Section as follows:

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Yours faithfully,

No signature on website copy

(C. ZHANG)
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