# REPUBLIC of SAN MARINO
## MARITIME AUTHORITY

*MAIN CONTACT: SAN MARINO SHIP REGISTER*
PH: +378 (0549) 960075| FAX: +378 (0549) 941305| EMAIL: security@smsr.sm

# San Marino Policy Letter

# SMPL – 2025-SEC-003

# 10 February 2025

# San Marino Ship Register SMSR

# Maritime Security

# Establishing of a digital archive for Ship Security Plans and connected Ship Security Assessments of ships flying the San Marino flag.

TO: Recognised Security Organisations, Companies, Owners, Company Security Officers, Deputy Company Security Officers, and the general public.

| Rev. No. | Date | Changes | Initials |
|----------|------|---------|----------|
| 0 | 10 February 2025 | 1$^{st}$ issue | EdR |

## 1. Preamble

The Republic of San Marino is Member state of the International Maritime Organization (IMO) since March 2002.
According to law No. 120 on the 2nd of August 2019, the San Marino Civil Aviation and Maritime Navigation Authority is acting as the maritime Administration and is supported by the San Marino Ship Register.

On the 9th of April 2021, the Republic of San Marino signed the instrument of accession, amongst the others, to the International Convention for the Safety of Life at Sea (SOLAS), 1974 as amended.

On the 26th of May 2021 the San Marino Civil Aviation and Maritime Navigation Authority adopted the Large Yacht Safety Code (LYSC) [1]which considers the application of the SOLAS Chapter XI-2 "Special measures to enhance maritime security" and the "International Code for the Security of Ships and Port Facilities" (ISPS Code) also to all commercial yachts ≥ 24 meters in load line length[2] and ≥ 500 GT and above engaged in international voyages.

## 2. Acronyms & definitions

- **Administration:** the San Marino Civil Aviation and Maritime Navigation Authority (SM CAA - MNA).

- **Company**: as defined by SOLAS regulation IX/1.2

- **CSO**: Company Security Officer, as defined by ISPS Code section A/2.1.7

- **DCSO**: Deputy Company Security Officer as identified in paragraph 4.1 of the San Marino Policy Letter SMPL-2021-SEC-014 dated 11 October 2021

- **LYSC**: Large Yacht Safety Code, SMPL-2021-TEC-008

- **RSO:** Recognised Security Organisation, as defined by SOLAS regulation XI-2/1.16

- **Security incident**: as defined by SOLAS regulation XI-2/1.13

- **SMSR**: the San Marino Ship Register

- **SSA:** Ship Security Assessment, as identified by ISPS Code section A/8

- **SSP**: Ship Security Plan, as defined by ISPS Code section A/2.1.4

## 3. Scope

1. This Policy Letter, which complements SMPL-2021-SEC-014[3] and SMPL-2023-

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[1]   https://www.smsr.sm/wp-content/uploads/2023/03/210526-SMPL-2021-TEC-008-LYSC-1.pdf

[2]  In the case of yachts built before 21 July 1968, 150 gross tons and over, according to applicable tonnage measurement regulations.

[3]   https://www.smsr.sm/wp-content/uploads/2023/03/211011-SMPL-2021-SEC-014-Maritime-Security.pdf

SEC-004[4], aims at providing instructions for uniform methods and criteria for the transmission by Recognised Security Organisations of SSPs approved on behalf of the Administration, and of the pertinent SSAs used during the approval procedure.

2. The archive is intended for allowing the Administration to have SSPs of the San Marino flagged ships readily available for consultation in case of security incidents (e.g. SSAS messages, upon CSO verification).

3. This SMPL also aims at providing an additional tool for RSOs to share with the Administration, in a secure digital environment, an archive of approved SSPs and connected SSAs where the approval, review and amendment of the plans can be uploaded by the RSOs and considered notified to the Administration.

4. Furthermore, this SMPL is also intended to provide information to Companies, owners, and to relevant security service providers and operators, as circumstances might require.

## 4. Application

1. The following instructions applies to RSOs. More specifically, these instructions apply for SSPs reviewed, approved, and amended with the same latitude provided for:
   (i)    SOLAS chapters/regulations: XI-2/2
   (ii)   ISPS Code section A/3
   (iii)  LYSC article 15.

2. In accordance with the ISPS Code the RSO may carry out the SSA (Section A/8.3) and may prepare the SSP (Section A/9.1.1). However, according to section A/9.2.1, the RSO undertaking the review and approval of a SSP or its amendment, for a specific ship shall not have been involved in either the preparation of the SSA or of the SSP, or of the amendments, under review.

3. If a RSO has been involved for a specific ship in either the conduct of the SSA or the development of the SSP or its amendment, it shall not be engaged in the approval of the SSP or in verifications for the certification of the ship.

## 5. Population of the archive

1. RSOs shall populate the archive by sending/uploading files in PDF format/A[5].

2. Procedures for accessing the archive and sending/uploading documents are provided in Annex 1.

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4   https://www.smsr.sm/wp-content/uploads/2023/05/04-SMPL-2023-SEC-004.pdf

5   PDF/A is the standard format adopted worldwide for archiving electronic documents and llows documents to be viewed in their original appearance on various software. The difference between a standard PDF and PDF/A is that the latter cannot include elements that make it unsuitable for long-term archiving.

## 6. Entry into force

1. This SMPL shall enter into force and shall apply from 1 March 2025.

2. For ships referred to in point 4.1, RSOs will populate the archive with approved SSPs (and relevant SSAs) as follows:
   (i) No later than 31 March 2025 for all ships already register in the SMSR as of 28 February 2025.
   (ii) No later than one month after the approval, review, and amendment of SSPs for ships registered in the SMSR after 28 February 2025.

**Annex 1**

# Instructions for sending Ship Security Plans (SSPs) and the relevant Ship Security Assessments (SSAs) to San Marino Ship Register (SMSR)

## File format

The San Marino Ship Register has selected the PDF format/A as standard to store its documents. The PDF/A format guarantees that the documents cannot be changed and that it is possible to read it on the highest number of devices. In fact, the PDF/A format is the international standard for archiving official documents.

## File naming

To ensure an immediate finding of the file, we need the files to be sent to us with a name that identifies the content. For this reason, we kindly ask you to name each file as per rule below:
SSP

| IMO Num | - | NAME OF THE SHIP | - | CALLSIGN | - | SSP EXPIRING DATE |
|---|---|---|---|---|---|---|
| | | 1234567-BEST SHIP-T7XXX-26012029.PDF | | | | |

SSA

| IMO Num | - | NAME OF THE SHIP | - | CALLSIGN | "SSA" |
|---|---|---|---|---|---|
| | | 1234567-BEST SHIP-T7XXX-SSA.PDF | | | |

## Documents Sending

You can select one of the following methods to send documents:

### Sending by mail

- ☑ Create a zip file **with password**, where to collect one or all the required SSP files
- ☑ Send ZIP file to security@smsr.sm
- ☑ Send Password to info@smsr.sm
- ☑ Please delete from your "sent mail" the two e-mails to cancel those reserved documents from your e-mail software.

**or**

### Upload by web page of Proton Drive

The San Marino Ship Register' Proton Drive, has end-to-end encryption and ensures that your files,

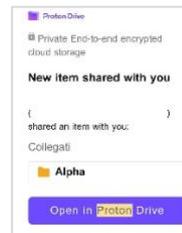their names, and more are all fully encrypted at rest and in transit to your secure cloud.

To make the entire communication process of the SSP and SSA documents between RSO and SMSR, we have created a safe procedure to allow you to send SSP and SSA documents in a simple and quick way. By simply accessing folders by web browser, you can add, delete or modify them and everything will be filed as whole in the folder with the chance of recovering old versions or accidental cancellations. The folder can only be managed and monitored by you and SMSR. Other RSO will have completely separated dedicated areas.

If you would like to test this method, please send an email to info@smsr.sm and we will send you the link to open your area.
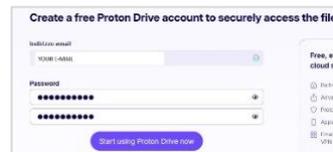
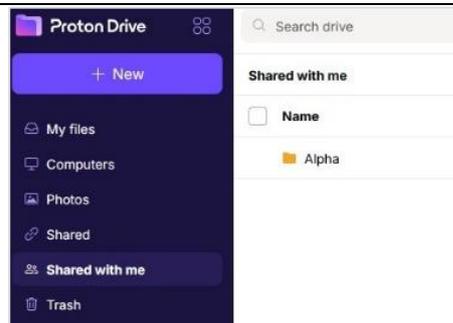**For further other clarifications please contact our office at info@smsr.sm**

| Instructions | |
|---|---|
| Receive mail and confirm "Open in Proton Drive" |  |
| Create your password<br>Now your account is open<br>**Your account**: your e-mail<br>**Your password**: as you selected |  |
| Click to **Shared with me** menu |  |
| Accept the share |  |
| Now, you have your Reserved SSP and SSA files area, you can drag and drop your SSP and SSA files on the Proton-webpage to transfer your files with "end-to-end encryption" to us. |  |

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