



REPUBLIC OF TURKEY  
MINISTRY OF TRANSPORTATION & INFRASTRUCTURE  
General Directorate for Maritime Affairs

Issue: E-80368960-105.01.01-70007

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Subject: Cyber Risk Management

RELEVANT DISTRIBUTION LOCATIONS

As is known, pursuant to IMO Resolution MSC.428(98) (Maritime Cyber Risk Management in Safety Management Systems), Maritime Cyber Risk Management is required to be defined in the Safety Management System of the ship, and all plans and procedures to be issued on the subject matter are required to comply with the applicable guidelines on the subject concerned whereas such documentation to be issued shall be required to be reviewed during the first DOC (Document of Compliance) inspection to be conducted after January 1<sup>st</sup>, 2021 thereof.

In addition, guidelines issued by various Port States in their Memorandums of Understanding (MoUs) state that the availability of elements such as plans, procedures, guidelines, and risk assessments to be issued in relation to Cyber Risk Management in Safety Management Systems of ships as well as whether such documentation is issued in compliance with relevant applicable guidelines on the subject matter shall be reviewed and checked during Port State Control (PSC) Inspections to be conducted on the ships as of January 1<sup>st</sup>, 2021 thereof.

NOW, THEREFORE;

- Shipping operators with ships flying the Turkish Flag, for which SMC (Safety Management Certificate) and DOC (Document of Compliance) have been issued by our Port Authorities or Ship Classification Societies, shall be notified on the subject matter to ensure that Cyber Risk Management is incorporated into the current Safety Management System in compliance with the relevant applicable guidelines thereof;
- Plans, procedures, guidelines, and risk assessments to be issued in relation to such Cyber Risk Management shall be validated during the first DOC inspection to be conducted by our Port Authorities or Ship Classification Societies after January 1<sup>st</sup>, 2021 thereof;
- Plans, procedures, guidelines, and risk assessments to be issued in relation to Cyber Risk Management shall be reviewed and their implementation in the ship shall be validated during SMC inspections to be conducted by our Port Authorities or Ship Classification Societies after January 1<sup>st</sup>, 2021 for the ships subject to the ISM Code; and
- Domestically navigating petroleum ships, chemical ships, and gas carriers as well as their operators subject to domestic navigation in Turkey but for which DOC and SMC documentation has been issued as per the Regulation on Application of the International Safety Management (ISM) Code to Ships Flying the Turkish Flag and its Operators shall be required to define and implement such Cyber Risk Management in Safety Management Systems of the relevant ships;

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As the above requirements shall be applicable to the parties concerned, we kindly ask you to notify the same to your relevant members in order for the implementation of the aforesaid matters in line with these guidelines and undertaking necessary preparations in view of the importance of the subject matter thereof and we kindly submit the same for your information and for you to take any necessary action in this respect.

Ünal BAYLAN  
General Manager  
On behalf of the Minister

Distribution:

Port Authorities,  
Ship Classification Societies,  
IMEAK Chamber of Shipping,  
Mersin Chamber of Shipping, and  
Turkish Shipowners Association

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