



SUBJECT: Maritime Cyber Risk Management

REFERENCE:

- a) [IMO Resolution MSC.428\(98\)](#) *Maritime Cyber Risk Management in Safety Management Systems*
- b) [MSC-FAL.1/Circ.3](#) *Guidelines on Maritime Cyber Risk Management*

TO: Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships and recognized organizations.

1. PURPOSE

This Circular provides information on the interpretation, expectations, and requirements of the Administration in respect of the Maritime Cyber Risk Management.

2. APPLICATION

This Circular applies to all Antigua and Barbuda flagged Ships.

3. BACKGROUND

IMO has decided that safety management system audits, under the ISM Code, are to include cyber security as an identified risk.

The handling of the risks is to be verified in the audits carried out from the 1st January 2021, under IMO Res. MSC.428(98) ISM Code.

Recognized Organizations (ROs) have full authorization to carry out this work, under the requirements of the ISM Code, on behalf of Antigua and Barbuda flag.

See the list of our [Recognized Organizations](#) (ROs).

4. OBLIGATIONS AND GUIDANCE/RESPONSIBILITIES

1. Cyber security is key to ensuring the safe operation of vessels and safeguarding people, cargo and the environment and the IMO has adopted Resolution MSC. 428(98) which stipulates that an approved safety management system should consider cyber risk management, as part of the requirements under ISM Code.
2. Companies must, no later than the first annual verification of their ISM Document of Compliance (DOC), after 1 January 2021, demonstrate that cyber security is an integral part of the safety management system.
3. The IMO has also issued guidelines on their website for maritime cyber risk management under [MSC-FAL.1/Circ.3](#) MSC. FAL.1/Circ.3 and it is recommended that ISM DOC holders carefully consider this guidance. It recommends a risk

management approach to cyber risks that is resilient and evolves as a natural extension of existing safety and security management practices.

Issued by

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