



**ΕΛΛΗΝΙΚΗ ΔΗΜΟΚΡΑΤΙΑ  
ΥΠΟΥΡΓΕΙΟ ΝΑΥΤΙΛΙΑΣ ΚΑΙ  
ΝΗΣΙΩΤΙΚΗΣ ΠΟΛΙΤΙΚΗΣ  
ΑΡΧΗΓΕΙΟ ΛΙΜΕΝΙΚΟΥ ΣΩΜΑΤΟΣ –  
ΕΛΛΗΝΙΚΗΣ ΑΚΤΟΦΥΛΑΚΗΣ  
ΚΛΑΔΟΣ ΕΛΕΓΧΟΥ ΠΛΟΙΩΝ  
ΔΕΔΑΠΛΕ Γ'**

Πειραιάς, 31 Οκτωβρίου 2024  
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**ΠΡΟΣ: Αποδέκτες Πίνακα Διανομής**

**ΘΕΜΑ: « Οδηγίες προς τους φορείς διοίκησης και εκμετάλλευσης λιμενικών εγκαταστάσεων - Καταγραφή ευρημάτων από επιθεωρήσεις της Ε.Ε. ».**

*ΣΧΕΤ: α) Ν. 3622/2007 (ΦΕΚ 281 Α') ως ισχύει.  
β) Κανονισμός 725/2004/ΕΚ.  
γ) Οδηγία 2005/65/ΕΚ.  
δ) Η Αριθ. 4113.319/02/2014 Υ.Α. (Β'3191).  
ε) Η Αριθ. Πρωτ.: 2343.3-10/29144/2022/28-04-2022 εγκύκλιός μας.  
στ) Η Αριθ. Πρωτ.: 2343.3-10/24457/2022/07-04-2022 εγκύκλιός μας.  
ζ) Κανονισμός 348/2008/ΕΚ*

**1.-** Σύμφωνα με τις διατάξεις του (α) σχετικού, οι φορείς διοίκησης και εκμετάλλευσης λιμενικών εγκαταστάσεων της Επικράτειας ορίζουν Υπεύθυνους Ασφάλειας Λιμενικής Εγκατάστασης (ΥΑΛΕ) και έχουν την ευθύνη για την πραγματοποίηση αξιολόγησης ασφάλειας των λιμενικών εγκαταστάσεων τους, τη σύνταξη και εφαρμογή των απορρεόντων από την αξιολόγηση σχεδίων ασφάλειας, τις αναθεωρήσεις αυτών και γενικότερα συμμορφώνονται προς τις διατάξεις του Κώδικα ISPS και του Κανονισμού 725/2004 ΕΚ, διαθέτοντας τους απαραίτητους προς τούτο πόρους. Επίσης, διαθέτουν πόρους και μέσα για την υλοποίηση των μέτρων ασφάλειας που προβλέπονται στα εγκεκριμένα σχέδια ασφάλειας των λιμενικών εγκαταστάσεων που διαχειρίζονται.

**2.-** Οι εγκεκριμένες μελέτες αξιολόγησης και σχεδίου ασφάλειας λιμενικής εγκατάστασης πρέπει να επανεξετάζονται σε τακτικά χρονικά διαστήματα, όποτε προκύπτουν συγκεκριμένες αλλαγές και να αναθεωρούνται αναλόγως όταν αυτό απαιτείται. Ειδικότερα με ευθύνη του Υπευθύνου Ασφάλειας Λιμενικής Εγκατάστασης (ΥΑΛΕ) η εγκεκριμένη μελέτη Αξιολόγησης και Σχεδίου Ασφαλείας Λιμενικής Εγκατάστασης (ΑΑΛΕ/ΣΑΛΕ) επανεξετάζεται κατ' έτος, προκειμένου να διαπιστωθεί η ανάγκη ή μη της αναθεώρησής της και η εγκεκριμένη μελέτη ΑΑΛΕ με ευθύνη του φορέα διοίκησης και εκμετάλλευσης της λιμενικής εγκατάστασης, επανεξετάζεται υποχρεωτικά είτε από Α.Ο.Α είτε από την Ενιαία Αρμόδια Αρχή (Υπουργείο Ναυτιλίας και Νησιωτικής Πολιτικής (ΥΝΑΝΠ)) το αργότερο πέντε έτη αφότου διενεργήθηκε ή από την τελευταία αναθεώρηση της ή από την τελευταία επανεξέταση της από την Ενιαία Αρμόδια Αρχή (ΥΝΑ) ή από Α.Ο.Α. Η διενέργεια των επανεξετάσεων τεκμηριώνεται με τήρηση σχετικού αρχείου επανεξετάσεων κατά τα αναφερόμενα στη παράγραφο 16.5 του μέρους Β του Κώδικα ISPS.

**3.-** Με δεδομένη τη σημασία που δίνει η Ε.Ε. στην εφαρμογή της σχετικής νομοθεσίας, κλιμάκιο επιθεωρητών της, όταν επισκέπτονται κράτη μέλη στο πλαίσιο των ελέγχων που διενεργούν σύμφωνα με τις προβλέψεις του (ζ) σχετικού, επικεντρώνονται στην ικανοποίηση των απαιτήσεων που περιγράφηκαν στις προηγούμενες παραγράφους και την ορθή εφαρμογή των προβλεπόμενων μέτρων του ΣΑΛΕ, ιδίως σε ότι αφορά τη φυσική ασφάλεια των εγκαταστάσεων, με τη

διατήρηση παράλληλα των σχετικών αρχείων. Προκειμένου να γίνει καλύτερη η κατανόηση του τύπου των ευρημάτων/παρατηρήσεων που δύναται να καταγραφούν σε περίπτωση επιθεώρησης από την Ε.Ε., καθώς και το εύρος του ελέγχου των επιθεωρητών της Ε.Ε. παρακάτω παρατίθεται ενδεικτικός πίνακας στην αγγλική γλώσσα με τα συχνότερα ευρήματα και τον χαρακτηρισμό τους (σημαντικές μη συμμορφώσεις/μη συμμορφώσεις) που έχουν διαπιστωθεί και καταγραφεί σε εκθέσεις μελών της Ευρωπαϊκής Επιτροπής κατά τη διενέργεια ελέγχων σε φορείς διοίκησης και εκμετάλλευσης λιμενικών εγκαταστάσεων, καθώς και σε αρμόδιες, για την εφαρμογή του Κώδικα ISPS και του Κανονισμού 725/2004 ΕΚ, αρχές άλλων κρατών μελών (έχουν απαλειφθεί οι επωνυμίες των λιμενικών εγκαταστάσεων και των αρχών/χωρών):

A/A	ΠΑΡΑΤΗΡΗΣΕΙΣ ΣΕ ΕΠΙΘΕΩΡΗΣΕΙΣ ΛΙΜΕΝΙΚΩΝ ΕΓΚΑΤΑΣΤΑΣΕΩΝ
1	<p>- <b>Reg.(EC) 725/2004 Art. 3.5: Member States shall conform to the following paragraphs of Part B of the ISPS Code as if they were mandatory: (...) - 18.5 and 18.6 (frequency of security drills and exercises in port facilities and for port facility security officers), (...) <u>ISPS Code Part B Para 18.5</u> To ensure the effective implementation of the provisions of the port facility security plan, drills should be conducted at least every three months unless the specific circumstances dictate otherwise. These drills should test individual elements of the plan such as those security threats listed in paragraph 15.11.</b></p> <p><b>Report of the European Commission:</b> It was identified that two drills were not carried out in the second quarter of 2017 and in the last quarter of 2018, respectively. <b>Conclusion:</b> Non-conformity</p>
2	<p>-<b><u>ISPS Code Part A Section 14.2:</u> At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility; <u>ISPS Code Part A Section 16.3</u> The plan shall address, at least, the following: (...) .2 measures designed to prevent unauthorised access to the port facility, to ships moored at the facility, and to restricted areas of the facility; (...)</b></p> <p><b>Report of the European Commission:</b> The inspection revealed that access to the PF Terminal «...»(P...-0003) is not controlled in line with the requirements laid down in the ISPS Code. This PF neighbours a non-ISPS PF for which the only access points are the waterside and the land passage through the ISPS facility. With the acquisition of the land parcel, the non-ISPS facility has also acquired thoroughfare rights between its own land and the public road on the other side of the ISPS PF. According to the declarations of the representatives of the administration, the gate connecting the non-ISPS facility with the ISPS PF is open when the non-ISPS facility is active, and, even though the access point is monitored with CCTV, unauthorised access from the non-ISPS facility to the ISPS PF is possible without access controls being carried out. The PFSP of the concerned PF does not describe this arrangement. The Commission requests the authorities to take all necessary steps to ensure that access to the concerned ISPS PF is effectively controlled at all times and under all circumstances, and that the PFSP adequately describes the relevant arrangements. <b>Conclusion:</b> Non-conformity</p>
3	<p>-<b><u>ISPS Code Part A Section 14.2:</u> At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .4 monitoring restricted areas to ensure that only authorised persons have access.</b></p> <p><b>Report of the European Commission:</b> The port facility security plan establishes that restricted areas have to be fenced off and marked. During the tour of the port facility it was verified that not all the accesses to the restricted areas have been marked like the access of walking passengers to the emigration after crew boarding pass control point. Consequently, the Commission requests the authorities to ensure that the requirements for the restricted areas established in the port facility security plan are updated and applied accordingly. <b>Conclusion:</b> Non-conformity</p>
4	<p>-<b><u>ISPS Code Part B Para. 16.8:</u> In addition to the guidance given under paragraph 16.3, the port facility security plan should establish the following, which relate to all security levels: (...) .11 the procedures to maintain, and update, records of dangerous goods and hazardous substances and their location within the port facility.</b></p> <p><b>Report of the European Commission:</b> The port facility security plan does not establish procedures to maintain and update records of dangerous goods and hazardous substances and their location within the port facility. Consequently, the Commission requests the authorities to ensure that the port facility security plan is</p>

	adequately updated. <u>Conclusion</u> : Non-conformity
5	<p><b>-ISPS Code Part A Section 14.2:</b> At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility. <b>ISPS Code Part A Section 16.3</b> Such a plan shall be developed taking into account the guidance given in part B of this Code and shall be in the working language of the port facility. The plan shall address, at least, the following: (...) .2 measures designed to prevent unauthorised access to the port facility, to ships moored at the facility, and to restricted areas of the facility.</p> <p><b>Report of the European Commission:</b> The port facility security plan establishes the requirement to have a fence all over the port facility perimeter. Due to works at the perimeter of the neighbouring port facility, the permanent fence was replaced by temporary fences in two places. However, there is no evidence of the alternative security measures put in place to address the referred works. The port facility security officer declared that closed circuit television (CCTV) surveillance would be one of the measures to enhance surveillance. From the inspection of the CCTV system in place, this measure revealed not to be effective, since a mast in front of the CCTV camera prevented the coverage of the referred perimeter area. Consequently, the Commission requests the authorities to ensure that alternative temporary security measures are established and implemented accordingly. In addition, the Commission recommends the Designated Authority to be aware of the duration and the nature of the works in order to assess their impact in the threats and vulnerabilities established in the port facility security assessment in place. <u>Conclusion</u>: Non-conformity</p>
6	<p><b>-ISPS Code Part A Section 14.2:</b> At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility. <b>ISPS Code Part A Section 16.3</b> Such a plan shall be developed taking into account the guidance given in part B of this Code and shall be in the working language of the port facility. The plan shall address, at least, the following: .1 measures designed to prevent weapons or any other dangerous substances and devices intended for use against persons, ships or ports, and the carriage of which is not authorised, from being introduced into the port facility or on board a ship.</p> <p><b>Report of the European Commission:</b> The port facility security plan establishes the requirement to perform security access control checks. However, it does not establish the frequency in which such checks have to be carried out. Consequently, the Commission requests the authorities to ensure that the port facility security plan is updated on this point and that the security access control checks are implemented accordingly. <u>Conclusion</u>: Non-conformity</p>
7	<p><b>-ISPS Code Part A Section 14.2:</b> At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility. <b>ISPS Code Part A Section 16.3</b> Such a plan shall be developed taking into account the guidance given in part B of this Code and shall be in the working language of the port facility. The plan shall address, at least, the following: (...) .15 procedures for facilitating shore leave for ship's personnel or personnel changes, as well as access of visitors to the ship, including representatives of seafarers' welfare and labour organisations.</p> <p><b>Report of the European Commission:</b> There is no evidence that the implementation of the access control measures for crew movements is implemented in accordance with the port facility security plan, for instance: i) there is no evidence of pre-notification of movements; ii) the officer on duty is not aware of the movements occurred for a number of records inspected on a random basis. In addition, the port facility security plan does not require movements from barges' crews to be pre-notified which in accordance with the port facility security officer statement is incorrect. Consequently, the Commission requests the authorities to ensure that the port facility security plan is updated on this point and that the access control measures for crew movements are implemented accordingly. <u>Conclusion</u>: Non-conformity.</p>
8	<p><b>-ISPS Code Part A Section 17.2:</b> In addition to those specified elsewhere in this Part of the Code, the duties and responsibilities of the port facility security officer shall include, but are not limited to: (...) .2 ensuring the development and maintenance of the port facility security plan. <b>ISPS Code Part A Section 16.7</b> The plan may be kept in an electronic format. In such a case, it shall be protected by procedures aimed at preventing its unauthorised deletion, destruction or amendment.</p> <p><b>Report of the European Commission:</b> The port facility security officer reviews and updates the port facility security plan kept in electronic format. However, there is no evidence of the track changes and amendments to</p>

	<p>the port facility security plan duly approved by the Designated Authority. Consequently, the Commission requests the authorities to ensure that the port facility security plan is protected by procedures aimed at preventing its unauthorised deletion, destruction or amendment. <u>Conclusion:</u> Non-conformity</p>
9	<p><b>-EC Reg. 725/2004 Article 3.5: Member States shall conform to the following paragraphs of the Part B of the ISPS Code as if they were mandatory: -1.16 (port facility security assessment) ISPS Code Part B Para 1.16 Each Contracting Government has to ensure completion of a PFSA for each of the port facilities, located within its territory, serving ships engaged on international voyages. The Contracting Government, a Designated Authority or a recognised security organisation may carry out this assessment. The completed PFSA has to be approved by the Contracting Government or the Designated Authority concerned. This approval cannot be delegated. Port facility security assessments should be periodically reviewed.</b></p> <p><u>Report of the European Commission:</u> The PFSA last reviewed on 26.07.2018 is not approved by the Designated Authority/ Contracting Government. <u>Conclusion:</u> Major non-conformity</p>
10	<p><b>-ISPS Code Part A Section 16.3: Such a plan shall be developed taking into account the guidance given in part B of this Code and shall be in the working language of the port facility. The plan shall address, at least, the following: (...) .2 measures designed to prevent unauthorised access to the port facility, to ships moored at the facility, and to restricted areas of the facility; (...)"</b></p> <p><u>Report of the European Commission:</u> During the walk around tour of the terminal, two of the areas marked as restricted and which should have been locked were found unlocked. <u>Conclusion:</u> Non-conformity</p>
11	<p><b>-ISPS Code Part B Para 16.3: All PFSPs should: (...) .3 detail the basic security level 1 measures, both operational and physical, that will be in place; (...)</b></p> <p><u>Report of the European Commission:</u> The CCTV system described in the PFSP does not correspond to the existing arrangements in the port facility. <u>Conclusion:</u> Non-conformity</p>
12	<p><b>-ISPS Code Part A Section 14.2: At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility;(…)</b></p> <p><u>Report of the European Commission:</u> The following issues were identified: i) no procedures were in place for supervising the handling of cargo between the terminal and the neighbouring facility at gate 6; ii) no procedures were implemented to control access from the neighbouring facility via gate 11. The Commission inspectors were informed that a license plate reader was used to control the movement of vehicles which are pre-authorised by the port facility to exit gate 11 to unload cargo at a warehouse located at the neighbouring facility. However, the Commission inspectors could not identify appropriate measures to check vehicles and drivers re-entering the port facility via gate 11. These arrangements were not included in the PFSA, nor were the interviewed staff with assigned security duties familiar with the security requirements. <u>Conclusion:</u> Non-conformity</p>
13	<p><b>-ISPS Code Part A Section 14.2: At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: .3 monitoring of the port facility, including anchoring and berthing area(s); ISPS Code Part B Para 16.3(...) .3 All PFSPs should: detail the basic security level 1 measures, both operational and physical, that will be in place; (...)</b></p> <p><u>Report of the European Commission:</u> The PFSP does not include any map or list identifying the locations of the CCTV cameras that were, according to the PFSA, used as security equipment in the port facility. <u>Conclusion:</u> Non-conformity</p>
14	<p><b>-Reg. 725/2004 Art. 3.5: Member States shall conform to the following paragraphs of Part B of the ISPS Code as if they were mandatory: (...) - 15.3 &amp; 15.4: minimum standards for the port facility security assessment ISPS Code Part B Para 15.3 The PFSA should address the following elements within a port facility: (...) 5. radio and telecommunication systems, including computer systems and network; (...)</b></p> <p><u>Report of the European Commission:</u> There is no evidence of the radio and telecommunication systems, including computer systems and network being addressed in the PFSA. <u>Conclusion:</u> Non-conformity</p>
15	<p><b>-ISPS Code Part B Para 16.8.12: In addition to the guidance given under paragraph 16.3, the PFSA should establish the following, which relate to all security level: (...) 12. the means of alerting and obtaining the services of waterside patrols and specialist search teams, including bomb searches and underwater searches; (...)</b></p>

	<p><b>Report of the European Commission:</b> There is no evidence of the means of alerting and obtaining the services of waterside patrols and specialist search teams, including bomb searches and underwater searches, being addressed in the PFSP. <u>Conclusion:</u> Non-conformity</p>
16	<p><b>-ISPS Code Part A Section 5 1.: Contracting Governments shall determine when a Declaration of Security is required by assessing the risk of ship/port interface or ship-to-ship activity poses to persons, property and the environment. (...) 5. The Declaration of Security shall address the security requirements that could be shared between a port facility and a ship (or between ships) and shall state the responsibility for each.</b></p> <p><b>Report of the European Commission:</b> The port facility applies a Permanent Declaration of Security (PDOS) with the ship "....." (IMO No .....), which is renewed on a three-monthly basis. The procedures "controlling access to the ship" and "controlling the embarkation of persons and their effects" indicated in the PDOS only refer to visitors, not passengers. Therefore, the PDOS does not address the controls to be carried out for every person potentially entitled to go on board the ship. <u>Conclusion:</u> Non-conformity</p>
17	<p><b>-ISPS code Part A Section 14.2: At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility; (...)</b></p> <p><b>Report of the European Commission:</b> Chapter 4.3.2 of the PFSP (Checking and search procedures for persons) provides that, at security level 1, five percent of persons entering the port facility will be subject to security searching to be carried out by the port security personnel. There is no evidence that the said percentage of searches is granted and of who is in charge of carrying out the activity (security guards at the gates, mobile patrols or other security personnel). <u>Conclusion:</u> Non-conformity</p>
18	<p><b>-ISPS Code Part A Section 17.2: In addition to those specified elsewhere in this Part of the Code, the duties and responsibilities of the port facility security officer shall include, but are not limited to: (...) .4 undertaking regular security inspections of the port facility to ensure the continuation of appropriate security measures; (...)</b></p> <p><b>Report of the European Commission:</b> No evidence was found that the port facility security officer undertakes regular security inspections in the port facility. <u>Conclusion:</u> Non-conformity</p>
19	<p><b>-ISPS Code Part A Section 15.5: The port facility security assessment shall include, at least, the following elements: (...) .3 identification, selection and prioritisation of countermeasures and procedural changes and their level of effectiveness in reducing vulnerability; ISPS Code Part A Section 14.2 At security level 1, the following activities shall be carried out through appropriate measures in all port facilities, taking into account the guidance given in part B of this Code, in order to identify and take preventive measures against security incidents: (...) .2 controlling access to the port facility; ISPS Code Part A Section 16.3 Such a plan shall be developed taking into account the guidance given in part B of this Code and shall be in the working language of the port facility. The plan shall address, at least, the following: (...) .2 measures designed to prevent unauthorised access to the port facility, to ships moored at the facility, and to restricted areas of the facility;</b></p> <p><b>Report of the European Commission:</b> The security perimeter of this port facility consists of metal grid fences, placed according to the description and drawings contained in the PFSP. During the walk around inspection of the port facility perimeter, it was observed that: • the position of the metal grid fencing next to small private houses and its size/ height, allows unauthorised access into the port facility from the roofs of the private houses; • the metal grid fencing is covered by dense bushes/ trees in the area next to the private houses, preventing the CCTV camera to surveil this particular area adequately. The PFSA described the fact that the outside port perimeter road runs very close and above the port facility fencing maximum height for a few hundred meters. There is no evidence of appropriate countermeasures identified. Furthermore, these security concerns are not addressed in the PFSP and/or not effectively corrected in the field. <u>Conclusion:</u> Non-conformity</p>
20	<p><b>-Reg. (EC) 725/2004 Annex II ISPS A/16.3.5 (...) : The plan shall address, at least, the following: (...) .5 procedures for evacuation in case of security threats or breaches of security (...);</b></p> <p><b>Report of the European Commission:</b> The procedures for evacuation were not addressed in the PFSP but in a separate document. However, the PFSP did not contain any reference to this separate document not approved by the Designated Authority. <u>Conclusion:</u> Non-conformity</p>
21	<p><b>-Port facility security plan ISPS code Part A Section 16.4: Personnel conducting internal audits of the security activities specified in the plan or evaluating its implementation shall be independent of the activities being</b></p>

	<p>audited unless this is impracticable due to the size and the nature of the port facility.</p> <p><b>Report of the European Commission:</b> The verification of internal port facility operator audits confirmed that these were conducted by the port security manager/ port security officer, being at the same time “...” Ferry’s company responsible person for all security-related activities. <b>Conclusion:</b> Non-conformity</p>
22	<p><b>-Port facility security officer ISPS code Part A Section 18.1: The port facility security officer and appropriate port facility security personnel shall have knowledge and have received training, taking into account the guidance given in part B of this Code.</b></p> <p><b>Report of the European Commission:</b> There is no evidence that the PFSO received appropriate training, as required. <b>Conclusion:</b> Non-conformity</p>
23	<p><b>-Port Facility Security Assessment ISPS Code Part A Par. 15.7: Upon completion of the port facility security assessment, a report shall be prepared, consisting of a summary of how the assessment was conducted, a description of each vulnerability found during the assessment and a description of countermeasures that could be used to address each vulnerability. The report shall be protected from unauthorised access or disclosure.</b></p> <p><b>Report of the European Commission:</b> No evidence was found that the abovementioned report was prepared by the competent authority or RSO. <b>Conclusion:</b> Non-conformity</p>
24	<p><b>-Regulation (EC) 725/2004 Article 3.6: Notwithstanding the provisions of the paragraph 15.4 of Part A of the ISPS Code, the periodic review of the port facility security assessments provided for in paragraph 1.16 of Part B of the ISPS Code shall be carried out at the latest five years after the assessments were carried out or last reviewed.</b></p> <p><b>Report of the European Commission:</b> The PFSA was approved on 22 June 2016. A review was submitted on 24 November 2021. No objective evidence was found that the review of the PFSA was carried out within the 5-year period established by the Regulation. <b>Conclusion:</b> Non-conformity</p>
25	<p><b>-Regulation (EC) 725/2004 Annex III Part B 18.6: Various types of exercises, which may include participation of port facilities security officers, in conjunction with relevant authorities of Contracting Governments, company security officers, or ship security officers, if available, should be carried out at least once each calendar year with no more than 18 months between exercises. [...] Reg. (EC) 725/2004 Article 3.5 Member States shall conform to the following paragraphs of Part B of the ISPS Code as if they were mandatory: [...] 18.5 and 18.6 (frequency of security drills and exercises in port facilities and for port facility security officers).</b></p> <p><b>Report of the European Commission:</b> No objective evidence was found that a security exercise was conducted during 2020, as required. <b>Conclusion:</b> Non-conformity</p>
26	<p><b>-Lack of security drills since the approval of the plan Regulation (EC) 725/2004 Annex III Part B 18.5: To ensure the effective implementation of the provisions of the port facility security plan, drills should be conducted at least every three months unless the specific circumstances dictate otherwise. [...] Regulation (EC) 725/2004 Art. 3.5 Member States shall conform to the following paragraphs of Part B of the ISPS Code as if they were mandatory: [...] 18.5 and 18.6 (frequency of security drills and exercises in port facilities and for port facility security officers).</b></p> <p><b>Report of the European Commission:</b> No objective evidence was found that security drills were conducted at least every three months since the approval of the PFSP on 5 August 2019. <b>Conclusion:</b> Non-conformity</p>
27	<p><b>-Measures described in the PFSP not implemented Regulation (EC) 725/2004 Annex II Part A 17.2.3: In addition to those specified elsewhere in this Part of the Code, the duties and responsibilities of the port facility security officer shall include, but are not limited to: . [...] . 3 implementing and exercising the port facility security plan;</b></p> <p><b>Report of the European Commission:</b> It was found that the PFSO had not fulfilled his duty to implement the measures described in the PFSP. Elements of the security infrastructure described in the PFSP (i.e. CCTV system) were not found to be actually in place. <b>Conclusion:</b> Non-conformity</p>

4.- Όπως διακρίνεται από τα προαναφερθέντα ιδιαίτερη σημασία δίνεται από την Ε.Ε. κατά τους ελέγχους, στη φυσική ασφάλεια των εγκαταστάσεων, στη διατήρηση των αρχείων που σχετίζονται με τη διακίνηση φορτίων/υλικών(ιδίως

επικίνδυνων), στα θέματα εκπαίδευσης προσωπικού και εκτέλεσης των καθηκόντων του, καθώς και των ασκήσεων/γυμνασίων όπως προβλέπονται στα οικεία Σχέδια Ασφαλείας.

5.- Κατόπιν των ανωτέρω και λαμβάνοντας υπόψη τα ενδεικτικά αναφερόμενα σημεία που εστιάζονται οι επιθεωρήσεις των ελεγκτών της Ε.Ε. παρακαλούμε όπως τηρείται τις κατευθύνσεις που δίνονται από την Υπηρεσία μας αναφορικά με την εφαρμογή του Κανονισμού 725/2004, ολοκληρώνοντας, όσοι υπόχρεοι φορείς δεν το έχουν κάνει μέχρι σήμερα, τόσο τις ετήσιες ή περιοδικές ανασκοπήσεις των μελετών ΑΑΛΕ-ΣΑΛΕ όσο και την αποκατάσταση των μη συμμορφώσεων που έχουν καταγραφεί κατά τους ετήσιους ελέγχους των οικείων λιμενικών αρχών, συγκρατώντας ότι υφίσταται πάντοτε πιθανότητα η χώρα μας το επόμενο χρονικό διάστημα να αποτελέσει επιλογή ελέγχου από κλιμάκιο ελεγκτών της Ε.Ε. σύμφωνα με τα οριζόμενα σε (ζ) σχετικό.

6.- Γραφείο Επικοινωνίας και Ενημέρωσης/Τμήμα Γ' και ΥΝΑΝΠ/Α.Λ.Σ.-ΕΛ.ΑΚΤ./ΔΗΔΕΠ όπου κοινοποιείται το παρόν, παρακαλούνται όπως αναρτήσουν την παρούσα εγκύκλιο στις ιστοσελίδες του ΥΝΑΝΠ και του ΗCG στις θέσεις:

<https://www.ynanp.gr/el/qia-ton-polith/nomo8esia/nomothesia-klados-elenchou-emporikon-ploemporikon-ploion/diey8ynsh-elegxoy-diaxeirishs-ths-asfaleias-ploiwn-kai-limenikwn-egkatastasewn-dedaple/nomo8esia-egkyklioianakoinwseis-asfaleias-xrhsima-entypa-isps/egkyklio/>

και

<https://www.hcg.gr/el/qia-ton-polith/nomo8esia/diey8ynsh-elegxoy-diaxeirishs-ths-asfaleias-ploiwn-kai-limenikwn-egkatastasewn-dedaple-1230/nomo8esia-egkyklioianakoinwseis-asfaleias-xrhsima-entypa-isps-1232/egkyklio-1239/>

αντίστοιχα, με αύξοντα αριθμό 93.

**Ο Διευθυντής**

**Πλοίαρχος Λ.Σ. (Τ) ΤΣΑΡΤΙΝΟΓΛΟΥ Κ-Ν**

#### **ΠΙΝΑΚΑΣ ΔΙΑΝΟΜΗΣ**

##### **I. ΑΠΟΔΕΚΤΕΣ ΠΡΟΣ ΕΝΕΡΓΕΙΑ**

1. ΟΡΓΑΝΙΣΜΟΙ ΛΙΜΕΝΑ Α.Ε. - ΔΗΜΟΤΙΚΑ ΛΙΜΕΝΙΚΑ ΤΑΜΕΙΑ-ΔΙΑΔΗΜΟΤΙΚΑ ΛΙΜΕΝΙΚΑ ΤΑΜΕΙΑ-ΛΙΜΕΝΙΚΑ ΤΑΜΕΙΑ – ΙΔΙΩΤΙΚΕΣ ΛΙΜΕΝΙΚΕΣ ΕΓΚΑΤΑΣΤΑΣΕΙΣ (Μέσω Λιμενικών Αρχών)
3. ΥΑΛΕ ΚΑΙ ΑΝΑΠΛΗΡΩΤΕΣ ΥΑΛΕ (Μέσω Λιμενικών Αρχών)

##### **II. ΑΠΟΔΕΚΤΕΣ ΠΡΟΣ ΚΟΙΝΟΠΟΙΗΣΗ**

Λιμενικές Αρχές Εσωτερικού

##### **III. ΕΣΩΤΕΡΙΚΗ ΔΙΑΝΟΜΗ**

1. ΥΝΑΝΠ/Γρ. κ. ΥΝΑΝΠ (υ.τ.α.)
2. ΥΝΑΝΠ/Γρ. κ. ΓΓΝΛ (υ.τ.α.)
3. ΥΝΑΝΠ/ΑΛΣ-ΕΛΑΚΤ/Γρ. κ. Α/ΛΣ-ΕΛΑΚΤ (υ.τ.α.)
4. ΥΝΑΝΠ/ΑΛΣ-ΕΛΑΚΤ/Γρ. κ.κ. Α' -Β' Υ/ΛΣ-ΕΛΑΚΤ (υ.τ.α.)
5. ΥΝΑΝΠ/ΑΛΣ-ΕΛΑΚΤ/Γρ. κ.κ.ΔΚΑ' - ΔΚΒ' - ΔΚΓ' (υ.τ.α.)
6. ΥΝΑΝΠ/ΓΓΝΛ/ΓΔΛΛΠΝΕ/ΔΛΠ-ΔΙΛΙΚΥΠ (υ.τ.ε.)
7. ΥΝΑΝΠ/ΑΛΣ-ΕΛΑΚΤ/ΔΗΔΕΠ
8. ΥΝΑΝΠ/Γρ. Επικοινωνίας και Ενημέρωσης/Τμήμα Γ'