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THE LAW HAS LANDED:

USCG CYBERSECURITY RULE

A Practical Quick Guide for Field Compliance and Operational Readiness

WHO MUST COMPLY: THE SCOPE OF REGULATION

Identifying Covered Entities and Practical Commercial Realities

- **MTSA-REGULATED ENTITIES:** The rule applies to U.S.-flagged vessels subject to MTSA 2002, Outer Continental Shelf (OCS) facilities, and MTSA-regulated waterfront facilities.
- **ADDITIVE REQUIREMENTS:** These cybersecurity mandates are additive to existing MTSA physical security plans, not replacements, requiring integrated security management.
- **FOREIGN-FLAGGED IMPACT:** While not directly covered, foreign vessels face intensified Port State Control scrutiny and commercial pressure from MTSA-regulated terminals.
- **SUPPLY CHAIN PRESSURE:** Charterers and cargo owners increasingly require evidence of cybersecurity compliance from all counterparties, making the rule a de facto industry standard.

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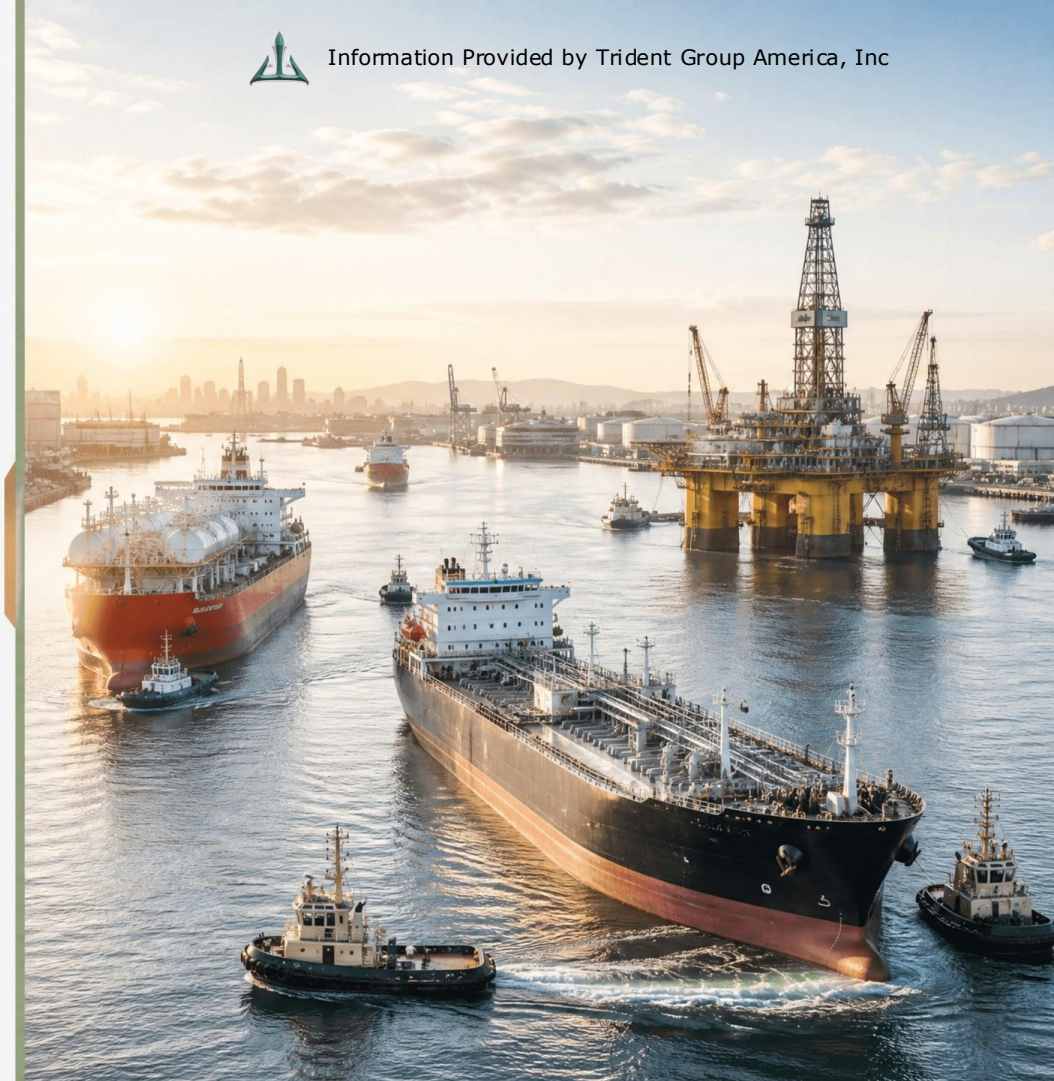

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PHASE 1: IMMEDIATE INCIDENT REPORTING

Mandatory NRC Notification for All Reportable Cyber Events

1. REPORTING DEADLINE: Effective July 16, 2025, all covered entities must report reportable cyber incidents to the National Response Center (NRC) without delay.

2. REPORTABLE INCIDENTS: Includes events that disrupt operations, compromise critical IT/OT systems, impact safety/security, or trigger incident response plans.

3. CONFIDENTIALITY & INTEGRITY: Any breach affecting the confidentiality, integrity, or availability of critical maritime cyber systems must be formally documented and reported.

4. ENFORCEMENT SHIFT: This phase marks the end of voluntary reporting, with the USCG now tracking incidents to build a comprehensive national maritime threat picture.

PHASE 2: MANDATORY PERSONNEL TRAINING

Ensuring Workforce Readiness and Cybersecurity Awareness

- **DEADLINE PASSED:** The January 12, 2026 deadline for initial training has passed; all personnel with IT/OT system access must now be fully trained and certified.
- **TWO-TIERED STRUCTURE:** Training includes general awareness for all staff and role-specific technical training for those managing remotely accessible OT systems.
- **NEW HIRE PROTOCOL:** All new personnel must complete required cybersecurity training within 30 days of gaining access to any covered vessel or facility systems.
- **ANNUAL REFRESHERS:** Compliance requires documented annual refresher training to ensure personnel remain current on evolving threats and reporting procedures.

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PHASE 3: THE 2027 COMPLIANCE MILESTONE

Preparing for the Most Substantive Regulatory Deliverables

1. JULY 16, 2027 DEADLINE: Requires the simultaneous delivery of a designated Cybersecurity Officer, a completed Assessment, and a USCG-approved Plan.

2. SEQUENCING CONSTRAINT: The Assessment must be completed first to inform the Plan's content, and the Officer must be designated to oversee both processes.

3. REVIEW BUFFER: Operators must account for an unknown USCG review period; waiting until mid-2027 to submit will likely result in a compliance gap.

4. OPERATIONAL URGENCY: For operators who haven't started, the timeline is tighter than it appears due to the complexity of OT system inventories and network mapping.

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THE CYBERSECURITY OFFICER (CySO)

Accountability, Qualifications, and Structural Flexibility

1. DESIGNATED ACCOUNTABILITY:

The CySO is the individual responsible for the compliance architecture, overseeing implementation and certifying the Plan's adequacy.

2. FUNCTIONAL QUALIFICATIONS:

Must possess knowledge of cyber administration, relevant laws, risk methodologies, and procedures for drills and exercises.

3. STRUCTURAL FLEXIBILITY:

A single CySO can cover multiple vessels or facilities, and the role can be filled by full-time staff, collateral duty, or contracted consultants.

4. AUTHORITY & RESOURCES:

Regardless of employment status, the CySO must have sufficient authority and resources to fulfill the role's substantive legal requirements.

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THE CYBERSECURITY ASSESSMENT

The Foundational Evaluation of IT and OT Environments

1. **COMPREHENSIVE SCOPE:**
   Not a simple audit; it's a full evaluation of IT/OT systems, network interconnections, and the effectiveness of existing security controls.

2. **CRITICAL SYSTEM INVENTORY:**
   Must identify all systems whose compromise would affect vessel safety, cargo integrity, or core operational capabilities.

3. **TECHNICAL EVALUATION:**
   Includes assessing access controls (MFA), network segmentation, patch management, and the reliability of backup/recovery procedures.

4. **EVIDENCE-BASED:**
   Requires documented proof of network diagrams, remote access inventories, and test evidence that default credentials have been removed.

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THE CYBERSECURITY PLAN (CySP)

Translating Assessment Findings into Operational Security

1. **SIX FUNCTIONAL DOMAINS:** The Plan must cover access protection, incident detection/ reporting, response/recovery, supply chain governance, training, and drills.

2. **SUBMISSION & CERTIFICATION:** Must be submitted to the USCG by **July 16, 2027,** constituting the operator's formal certification of regulatory compliance.

3. **RECURRING OBLIGATIONS:** Plans must be renewed every five years, with mandatory penetration testing required in conjunction with each renewal cycle.

4. **ANNUAL AUDIT REQUIREMENT:** Operators must conduct internal cybersecurity audits at least annually to ensure the Plan remains effective and up to date.

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COMMON IMPLEMENTATION GAPS

Critical Areas Where Early Implementation Often Fails in the Field

1. **NETWORK SEGMENTATION:**
   The most technically challenging requirement; separating legacy OT systems from IT networks often requires significant modification.

2. **THEORETICAL PLANNING:**
   Many incident response plans are created for compliance but fail when tested against realistic, high-pressure operational scenarios.

3. **VENDOR GOVERNANCE:**
   Managing third-party and supplier access to critical systems remains a major vulnerability that assessments often overlook.

4. **DOCUMENTATION VS. CAPABILITY:**
   The USCG requires actual security capability, not just the documentation of intended measures; performance is the metric.

CONCLUSION: A NEW ERA OF MARITIME SECURITY

Moving from Voluntary Guidance to Mandatory Federal Accountability

1. **ENFORCEABLE STANDARDS:**
   The USCG rule represents a permanent shift in maritime security, making cybersecurity as mandatory as physical safety.

2. **PROACTIVE INVESTMENT:**
   Successful compliance requires treating the rule as a genuine security investment rather than a last-minute documentation project.

3. **CONTINUOUS VIGILANCE:**
   With 828 maritime cyber incidents in 2025 alone, the threat environment provides the ultimate motivation for robust implementation.

4. **OPERATIONAL RESILIENCE:**
   Building a compliant cybersecurity posture ensures long-term operational legality and resilience against evolving global threats.

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