



Dr. Theodoros Ntouskas

Managing Director, ictPROTECT

Maritime Cybersecurity Compliance Roadmap



13o InfoCom Security
26 & 27 Απριλίου 2023

ict **PROTECT**

INFORMATION SECURITY SERVICES

www.ictprotect.com

Floating Digital Offices



Navigation Services
(AIS, GPS, ECDIS)

A black icon of a satellite in orbit.

Communication Systems

Black icons of a satellite and a mobile phone with signal waves.

Operational Services

Black icons of a computer monitor and a server rack.

Cargo Management

Black icons of a computer monitor and a robotic arm.

PMS

Black icons of a computer monitor and a server tower.

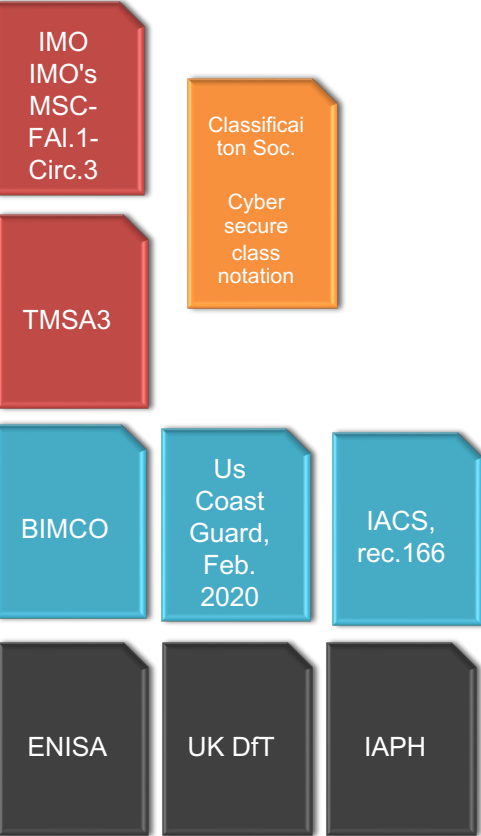
Crew network

Black icons of a USB drive and a wireless router.

OT Equipment

Black icons of a computer monitor, a server tower, and a circuit board.

Commercial Ships & Cybersecurity Requirements



IMO
IMO's
MSC-
FAI.1-
Circ.3

TMSA3

BIMCO

ENISA

Classical
ton Soc.

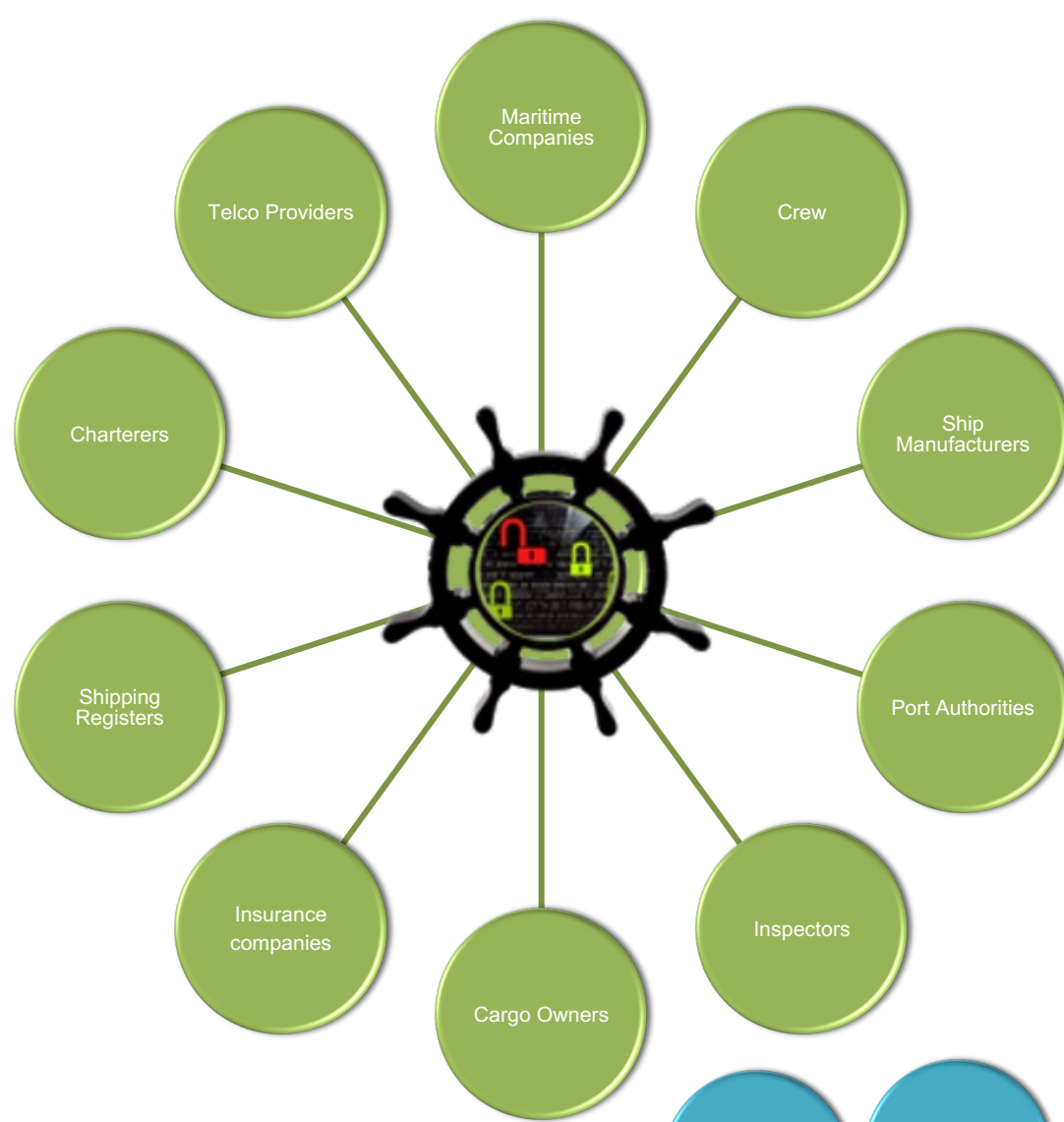
Cyber
secure
class
notation

Us
Coast
Guard,
Feb.
2020

IACS,
rec.166

UK DfT

IAPH



ISO
27001

ISO
22301

ISO
27701

SOC 2

GDPR

CCPA

ISO
27002

NIST
CSF



Phase I: Define Cyber Security Team

- Appoint CySo
- Assign security responsibilities to key personnel



Goals

Assign security responsibilities to key personnel (i.e. Master, Crew, Security Engineers, Department Managers)
Ensure Accountability
Responsibilities for the assets



Risks

Asset ownership related risks
Non-repudiation related risks



Phase II: Cartography

- Identify Information Assets (IT & OT)
- Identify assets' dependencies
- Identify the core business requirements
- Identify key suppliers



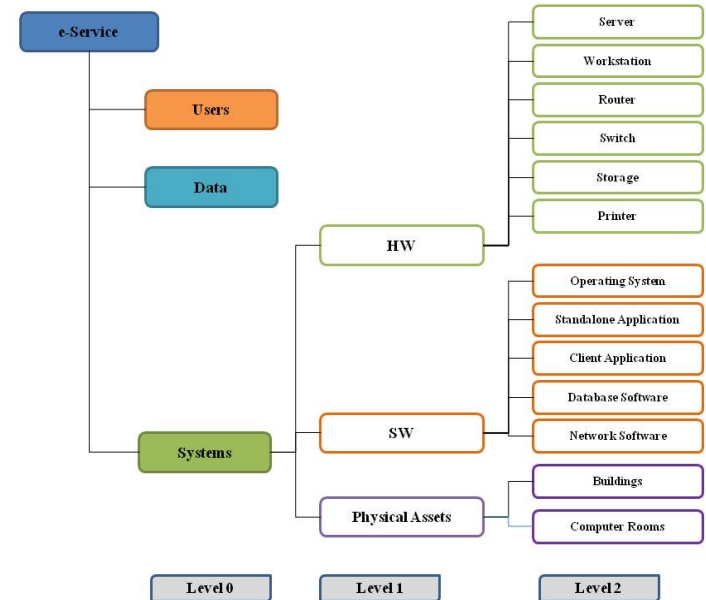
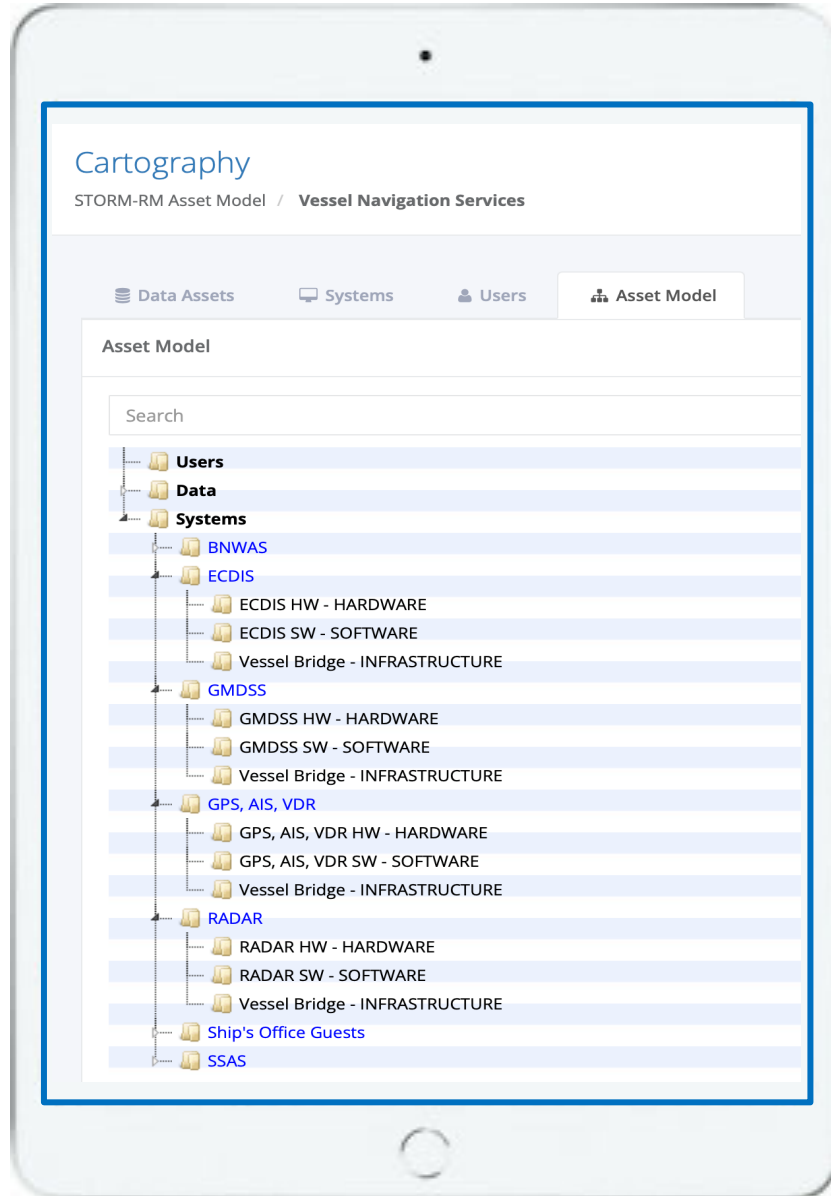
Goals

- Identify asset (IT/OT) dependencies
- Identify services dependencies
- Accurate list of critical suppliers
- Accurate impact assessment
- Targeted threat scenarios



Risks

- Inaccurate asset inventory
- Loss of dependencies
- Unwanted services / assets





Phase III: Conduct Readiness Assessment

- Map ISO 27001 & NIST controls with best practices such as IMO,ISM Code, TMSA, BIMCO etc.
- Identify existing controls and find grey areas



Goals

- Promptly identify grey areas
- Create a compliance baseline
- Improve reporting for interested parties



Risks

- Compliance risks
- Non compliance with interested parties requirement



Phase IV: Evaluate Key Suppliers

- Evaluate their technical controls
- Evaluate Supported Services - SLAs & DPA
- Compliance with applicable regulation



Goals

- Confirm provided SLA
- Comply with legal requirements
- Assign security related responsibilities to critical suppliers
- Establish a common framework for evaluating suppliers
- Require cyber risk management procedures from suppliers



Risks

- Supply chain risks
- Technical risks during maintenance phase
- Not established communication lines / escalation matrix during incidents

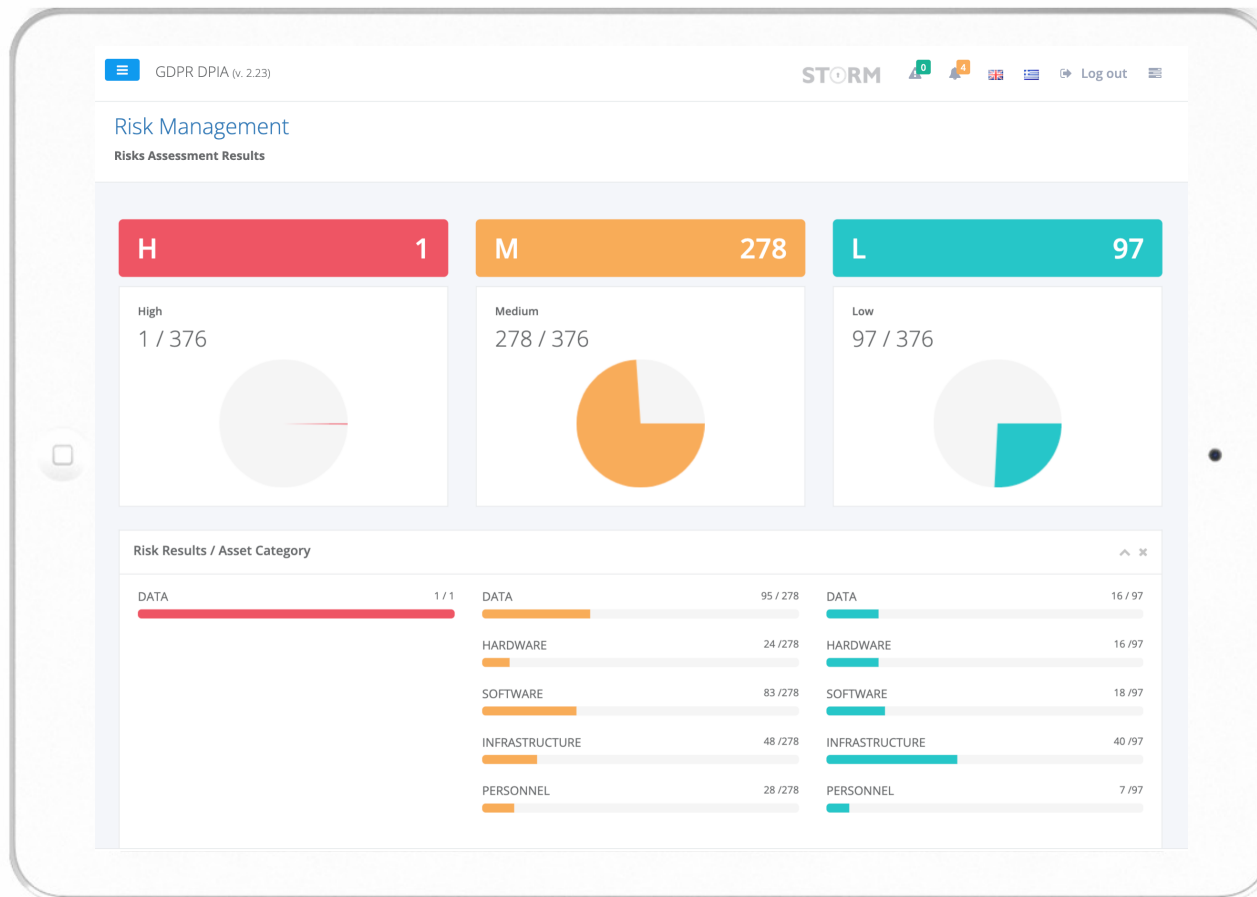
Digital supply chain risk

-- Gartner predicts that **by 2025, 45% of organizations** worldwide **will have experienced attacks on their software supply chains**, a three-fold increase from 2021



Phase V: Conduct Risk Assessment & Risk Treatment

Impact Assessment
Identify Potential Threats
Evaluate Vulnerabilities
Propose Mitigation Actions





Phase VI: Develop technical & organizational controls

- Security Policies & Procedures – embedded in the existing Manual
- Hardening of IT & OT equipment



Goals

- Adopt security policies & procedures by all employees
- Common language across company departments
- Establish cybersecurity incident plans
- Establish a holistic approach to cybersecurity including IT & OT systems
- Hardening and automation as possible



Risks

- Miscommunication across company users
- Unpatched systems



Phase VII: Develop Contingency Plans

- Identify recovery priorities
- Identify dependencies (SLAs with key suppliers & DPA with data processors)
- Establish communication lines
- Create Runbooks in case of unwanted event



Goals

Implement a comprehensive Cyber security incident framework

Assign ashore and at sea the appropriate responsibilities in case of an incident

Establish communication lines

Evaluate and improve recovery steps



Risks

Miscommunication during incident management

Loss of data / service due to supplier failure

Insufficient recovery priorities



Phase VIII: Monitor, Audit & Review

- Internal audit
- Review technical & organizational controls



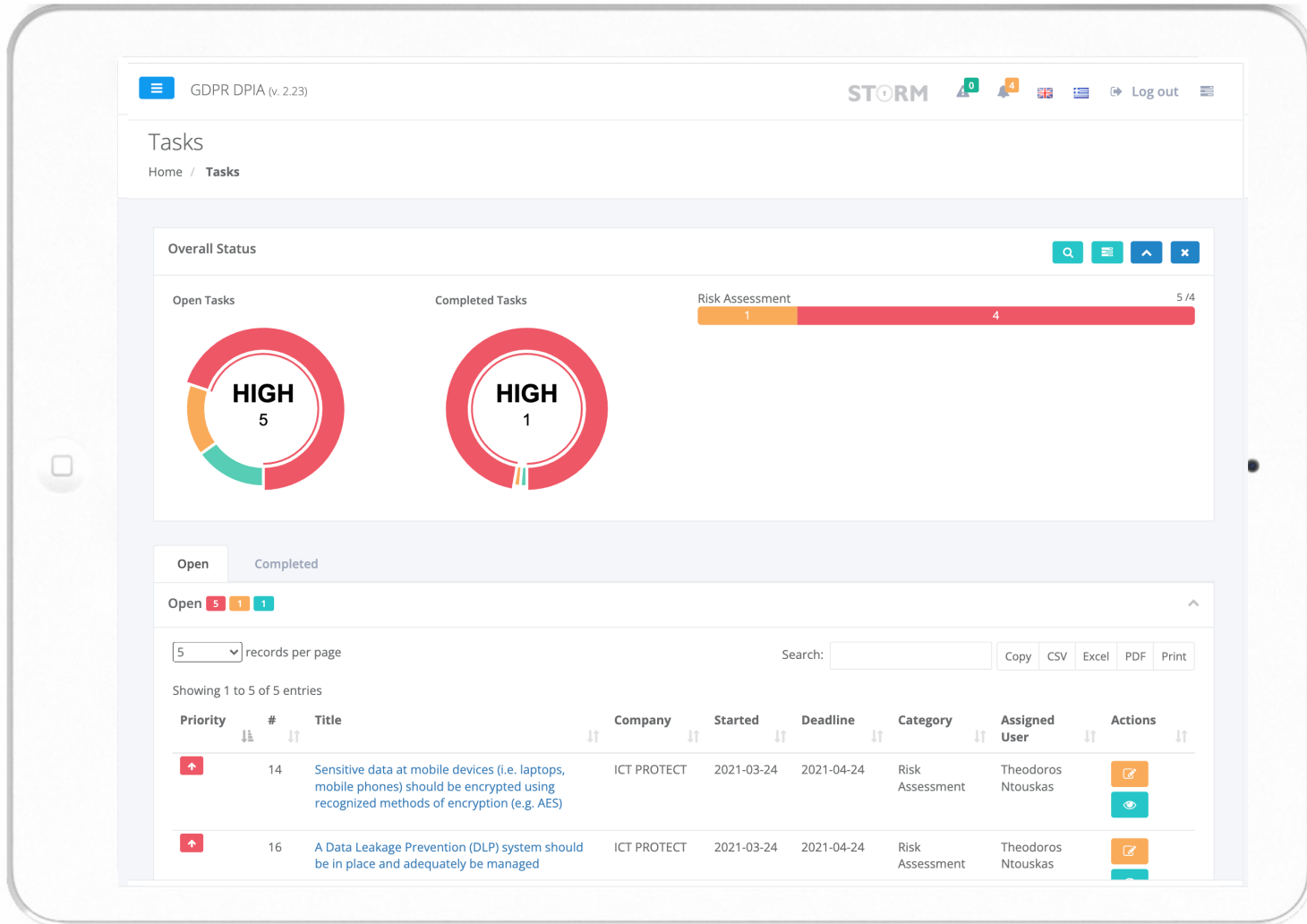
Goals

- Identify grey areas & areas of non-conformity on time
- Propose areas for improvement
- Identify the appropriate corrective actions



Risks

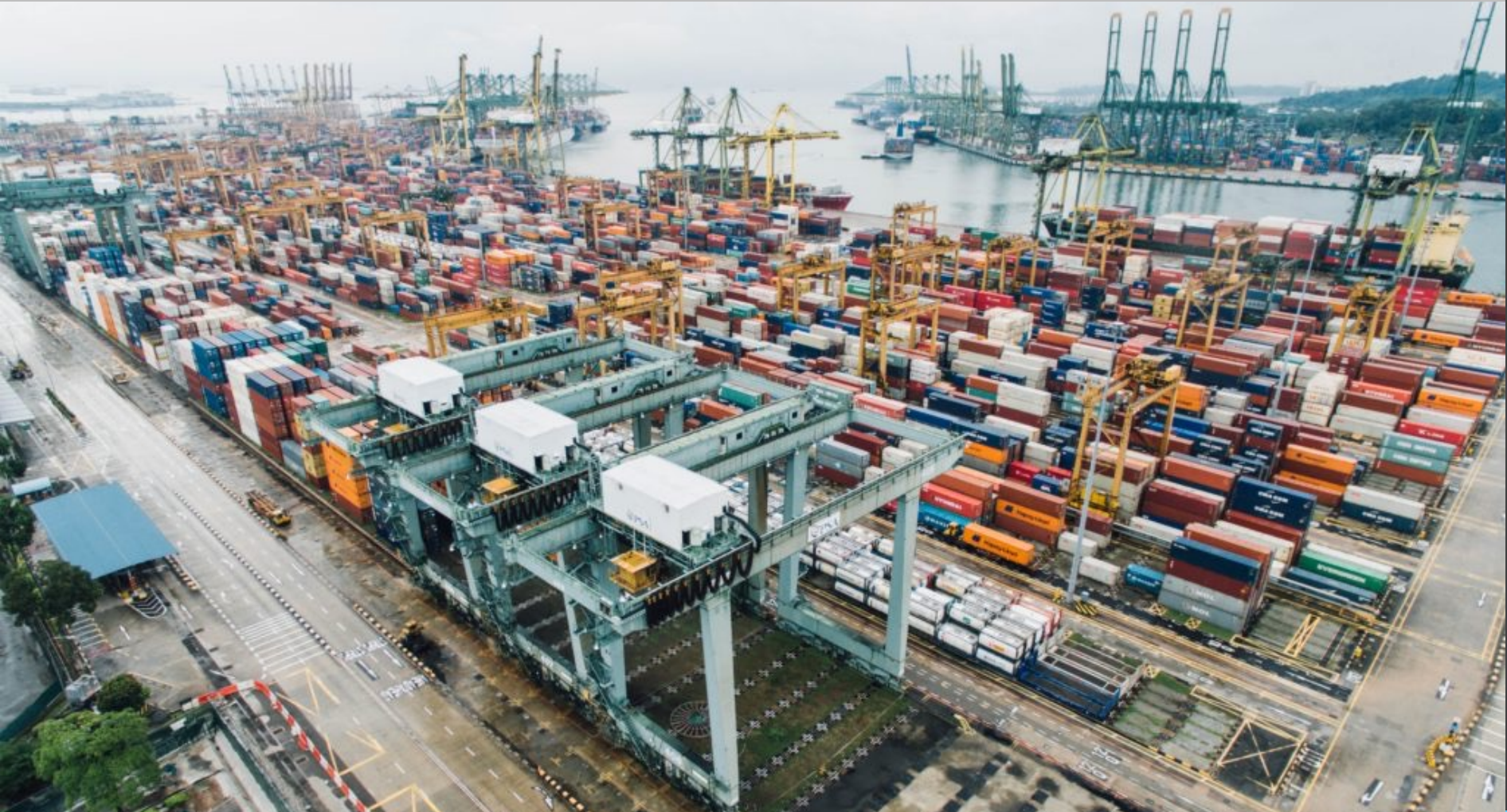
- Non compliance with industry standards
- Non compliance with company standards
- Non compliance with interested parties requirements



- With the **rapid growth** and adoption of technology in maritime environment, **Ship Information Systems (SIS)** and **Port ICT** are increasingly exposed against cyber risks.
- These cyber risks could be exploited:
 - by **satellite networks**, either
 - by **the traditional communication channels**
- and could have **significant impact** on all **maritime entities** affecting **international economy**.
- New & complex **compliance requirements**
- A **holistic and common approach (Cybersecurity Compliance Framework)** should be adopted for the security management of both ICT & OT systems in order to:
 - continuously monitor security and privacy risks,
 - improve their ICT-based business processes,
 - provide continuity and rendering of services for all entities of the maritime environment

- IMO - MSC-FAL.1/Circ.3 – Guidelines on Maritime Cyber Risk Management, July 2017,
 - [https://wwwcdn.imo.org/localresources/en/OurWork/Security/Documents/MSC-FAL.1-Circ.3%20-%20Guidelines%20On%20Maritime%20Cyber%20Risk%20Management%20\(Secretariat\).pdf](https://wwwcdn.imo.org/localresources/en/OurWork/Security/Documents/MSC-FAL.1-Circ.3%20-%20Guidelines%20On%20Maritime%20Cyber%20Risk%20Management%20(Secretariat).pdf)
- IMO - RESOLUTION MSC.428(98) - Maritime Cyber Risk Management in Safety Management Systems, June 2017,
 - [https://wwwcdn.imo.org/localresources/en/OurWork/Security/Documents/Resolution%20MSC.428\(98\).pdf](https://wwwcdn.imo.org/localresources/en/OurWork/Security/Documents/Resolution%20MSC.428(98).pdf)
- United States Coast Guard, February 2020, Guidelines for addressing cyber risks at Maritime Transportation Security Act (MTSA) regulated facilities,
 - https://www.dco.uscg.mil/Portals/9/DCO%20Documents/5p/5ps/NVIC/2020/NVIC_01-20_CyberRisk_dtd_2020-02-26.pdf?ver=2020-03-19-071814-023
- IACS (International Association of Classification Societies (IACS)) UK, Rec 166 - Recommendation on Cyber Resilience - New Corr.1 July 2020 Clean,
 - <https://www.iacs.org.uk/publications/recommendations/161-180/rec-166-new-corr1/>
<https://iacs.org.uk/download/10965>
- OCIMF - TMSA3 - Tanker Management Self-Assessment, April 2017,
 - <https://www.shipnet.no/key-elements-of-tmsa-3/>
- BIMCO - The Guidelines on Cyber Security Onboard Ships v4,
 - <https://www.bimco.org/about-us-and-our-members/publications/the-guidelines-on-cyber-security-onboard-ships>
- BIMCO - Cyber Security Workbook for On Board Ship Use, 2nd Edition, 2021,
 - <https://www.bimco.org/about-us-and-our-members/publications/cyber-security-workbook>
- BIMCO- The Guidelines on Cyber Security Onboard Ships
 - <https://www.bimco.org/about-us-and-our-members/publications/the-guidelines-on-cyber-security-onboard-ships>
- IMO – ISM Code, 2018 Edition,
 - <https://www.dohle-yachts.com/wp-content/uploads/2021/05/ISM-Code-2018.pdf>
- ENISA – EU, Port Cybersecurity – Good practices for cybersecurity in the maritime sector, November 2019,
 - <https://www.enisa.europa.eu/publications/port-cybersecurity-good-practices-for-cybersecurity-in-the-maritime-sector>
- United Kingdom Department of Transport - Cyber Security for Ports and Port Systems, January 2020,
 - https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/859925/cyber-security-for-ports-and-port-systems-code-of-practice.pdf
- IAPH – International Association of Ports and Harbors, Port Community Cyber Security,
 - <https://sustainableworldports.org/wp-content/uploads/IAPH-Port-Community-Cyber-Security-Report-Q2-2020.pdf>
 - https://sustainableworldports.org/wp-content/uploads/IAPH-Cybersecurity-Guidelines-version-1_0.pdf





Let's do business

info@ictprotect.com

© 2023 | www.ictprotect.com

ict **PROTECT**
INFORMATION SECURITY SERVICES