



TEST FIRE PROCEDURE

SM/OPS/PRO/002 v1.0

Test Fire Procedure



Document Reference	SM/OPS/PRO/002
Version	1.0
Title	Test Fire Procedure
Classification	Operational (OPS)
Owner	Group Compliance Director (GCD)
Approved By	Pavel Shparber, CEO / Darren Watts, GCD
Date Approved	14/04/2026
Review Date	14/04/2027
Supersedes	Legacy SOP provisions on weapons functional testing (standalone from 14/04/2026)

1. PURPOSE

This procedure establishes the Company position on weapons test firing at sea, the authorisation pathway where a client or Master insists on a test fire being conducted, and the mandatory controls that apply before, during, and after any test fire.

The default position of the Company is that test firing of weapons is prohibited. This procedure sets out the narrow, authorised exception pathway, together with the controls, geographic exclusions, and post-fire reporting required to ensure any such activity is conducted safely, lawfully, and with a full audit trail.

2. SCOPE

This procedure applies to all Privately Contracted Armed Security Personnel (PCASP) deployed by the Company, to all vessels on which PCASP teams are embarked, and to all weapons issued by the Company. It applies in the Indian Ocean Region (IOR), Gulf of Aden, Red Sea approaches, and any other region in which the Company conducts armed security operations.

This procedure is the sole authority on test firing of weapons within the Seagull Maritime management system. Any reference to test firing in legacy Standard Operating Procedures, client contracts, or pre-existing correspondence is superseded by this procedure with effect from the date of approval.

3. REFERENCES

SM/OPS/SOP/001 – Standard Operating Procedures, Indian Ocean
SM/OPS/PRO/001 – Rules on the Use of Force
SM/HSE/RA/011 – Test Fire at Sea Risk Assessment
SM/CAM/BRAG/010 – Test Fire Basic Risk Assessment Guide
SM/OPS/FORM/018 – Test Fire Authorisation and Acknowledgement Form
SM/OPS/FORM/019 – Weapons Discharge Report
SM/INT/PRO/006 – Incident and Crisis Management
SM/SEC/POL/002 – Human Rights Policy
BMP Maritime Security (BMP-MS)
ISO 18788:2015 – Management System for Private Security Operations
ISO 28007-1:2015 – Guidelines for PCASP on Board Ships
Voluntary Principles on Security and Human Rights (VPSHR)
International Code of Conduct for Private Security Service Providers (ICoCA)

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4. DEFINITIONS

"Test Fire" means the discharge of a Company-issued weapon at sea for the purpose of confirming functional condition, in advance of or during a transit, in circumstances where no engagement, warning shot, or operational firing is taking place.

"Functional Test" (also "mechanical test") means non-firing inspection of weapon condition, including strip, clean, function check, and dry fire where applicable. Functional tests are the Company's default means of confirming weapon readiness and do not require authorisation under this procedure.

"Authorising Officer" means the Group Compliance Director (GCD) or, in the GCD's documented absence, the Chief Executive Officer (CEO). No other role may authorise a test fire.

"Firer" means the Team Member (TM) nominated by the Team Leader (TL) to discharge a specific weapon during an authorised test fire.

"Geographic Exclusion" means any area listed in Section 8 of this procedure within which test firing is prohibited under any circumstances.

5. POLICY POSITION – DEFAULT PROHIBITION

Test firing of weapons is prohibited by default on all Company operations. This position reflects the Company's assessment that the risks associated with test firing – including negligent discharge, exposing inadequate competence, injury to crew or bystanders, ricochet, environmental harm, flag state and coastal state sensitivity, and the potential for a test fire to be perceived as a hostile act by third parties – outweigh the benefits of confirming weapon condition by firing rather than by inspection.

Functional mechanical testing (strip, clean, function check, dry fire) is the Company's standing means of confirming weapon readiness before and during operations. This is conducted by PCASP on deployment and at intervals specified in the SOP. It does not require authorisation under this procedure.

A Master or client who insists on a test fire being conducted may request authorisation under Section 7. Authorisation is granted sparingly, is never automatic, and is subject to the controls in this procedure.

6. ROLES AND RESPONSIBILITIES

6.1 Group Compliance Director (GCD)

- Sole authority for granting test fire authorisation. No delegation other than to the CEO in documented absence.
- Reviews Master's written request against Section 7 decision criteria.
- Issues written authorisation (Section 7.4) or refusal.
- Maintains the Company test fire register and reviews each completed FORM/018 and FORM/019.
- Withdraws authorisation at any time if conditions change.

6.2 Chief Executive Officer (CEO)

- Authorises test fires only in the documented absence of the GCD.

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- Applies the same decision criteria and controls as the GCD.
- Notifies the GCD of any authorisation granted under this provision at the earliest opportunity.

6.3 Operations Department

- Receives Master's written request via the Operations Coordinator and forwards without delay to the GCD.
- Does not pre-approve, pre-authorise, or indicate Company position to the client until the GCD decision is issued.
- Updates 1Clearview with test fire authorisation details and FORM/019 data on completion.
- Notifies the GCD of any Master request received outside Compliance.

6.4 Team Leader (TL)

- Supervises the test fire evolution. The TL does not fire during a test fire.
- Retains abort authority at all times and will halt the evolution if any control is breached, any exclusion becomes active, or any safety concern arises.
- Nominates the TM Firer for each weapon. Records the nomination on FORM/018 and confirms the Firer meets the minimum standard (FCC in date, no disciplinary flags in last 12 months, briefed on BRAG and this procedure).
- Confirms geographic position against all Section 8 exclusions immediately before firing and records the check on FORM/018.
- Ensures weapons remain under PCASP control at all times. The Master and crew are not permitted to handle, hold, or approach any weapon at any point during the evolution.
- Completes FORM/019 Weapons Discharge Report within 24 hours of firing and files with Operations.

6.5 Team Members (Firers)

- Each TM fires their own issued weapon only.
- Acknowledges the briefing (BRAG + procedure) in writing on FORM/018 before firing.
- Accepts personal responsibility for adherence to this procedure, the RA, and the TL's instructions during the evolution.
- Complies with single-shot firing only. Semi-automatic, burst, and automatic firing modes are prohibited under any circumstances.
- Makes weapon safe after firing and presents for TL inspection before stepping away.

6.6 Vessel Master

- Submits written request to Operations where the client or Master position is that a test fire is required.
- Signs FORM/018 confirming the request, acceptance of residual risk, and indemnification of the Company for any consequence arising from the test fire conducted at the Master's request.
- Confirms flag state permission where applicable.
- Does not handle, hold, or approach any weapon at any point. Does not instruct crew to do so.
- Permits the Team Leader to use available vessel internet or satellite communications during and after the evolution for the purpose of submitting a Safety App report in the event of a near miss, incident, or concern.

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7. AUTHORISATION PROCESS

7.1 Master's Written Request

Any test fire requires a written request from the Master, submitted to the Operations Coordinator. The request must state the reason, the intended location, and the intended time window. Verbal requests are not accepted.

7.2 Operations Forwards to GCD

The Operations Coordinator forwards the request to the GCD and compliance without delay and without indicating Company position to the client. Operations does not pre-approve and does not refuse – the decision rests with the Authorising Officer alone.

7.3 GCD Decision Criteria

The GCD reviews the request against the following criteria. All must be satisfied for authorisation to be granted:

- The vessel is not in any Geographic Exclusion listed at Section 8 and is not projected to enter one during the test fire window.
- The TL on task has Firearms Competence Certificate (FCC) in date and no disciplinary flags in the last 12 months.
- Each nominated Firer has FCC in date and no disciplinary flags in the last 12 months.
- Weapon condition is reported sound on current functional test records.
- Sea state, visibility, and traffic density permit safe identification of surrounding vessels, aircraft, and coastline.
- UKMTO, MSCHOA, and NATO Shipping Centre bulletins are reviewed, and no live advisory precludes firing.
- Flag state position is known and does not preclude firing.
- The Master has agreed in writing to sign FORM/018 including the indemnification clause.
- The Master has confirmed internet or satellite communications access will be made available on the bridge during and after the evolution to enable the Team Leader to submit a Safety App report if required.

7.4 Written Authorisation

Where the GCD is satisfied, written authorisation is issued by email to Operations, the TL, and the Master. The authorisation specifies the approved window, the approved location, the approved Firers, and the approved ammunition cap (maximum five rounds per weapon, single shot only, semi-automatic / burst / automatic firing prohibited). The authorisation is attached to FORM/018 before firing. Without written authorisation, no test fire may take place.

The GCD may refuse authorisation without stated reason. Refusal is final unless new material information is presented, in which case the Master may submit a fresh written request.

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8. GEOGRAPHIC EXCLUSIONS

Test firing is prohibited under any circumstances, and authorisation will not be granted, where the vessel is positioned within any of the following exclusions or is projected to enter one during the test fire window:

- Within 24 nautical miles of the Yemeni coastline, including Red Sea approaches, Bab-el-Mandeb, and the Gulf of Aden southern shore.
- Within 24 nautical miles of the Somali coastline.
- Transiting the Bab-el-Mandeb strait.
- Within the Internationally Recommended Transit Corridor (IRTC) or the Maritime Security Transit Corridor (MSTC).
- Within the territorial waters (12 nautical miles) of any coastal state.
- Within 5 nautical miles of any other vessel (merchant, fishing, naval, or pleasure).
- Within visual or radar range of any naval or coalition warship.
- Within 50 nautical miles of the Iranian coastline or any Islamic Revolutionary Guard Corps (IRGC) patrolled area within the Persian Gulf or Strait of Hormuz.
- Within any declared UKMTO, MSCHOA, or NATO Shipping Centre warning area – live advisory check is mandatory before firing.
- In any conditions of weather, sea state, or visibility that prevent safe identification of surrounding vessels, aircraft, or coastline.

The TL is required to confirm position against each exclusion immediately before firing, with lat/long, distance to nearest coastline, distance to nearest vessel, and UKMTO advisory status recorded on FORM/018. Any exclusion becoming active at any point aborts the evolution.

9. PRE-FIRE CONTROLS

9.1 TL Position and Environment Check

Immediately before firing, the TL confirms and records on FORM/018: lat/long position, distance to nearest coastline (with name), distance to nearest vessel (with type), UKMTO / MSCHOA / NATO Shipping Centre advisory status, sea state, visibility, wind direction, and flag state. Any failure to satisfy a Section 8 exclusion aborts the evolution.

9.2 Weapon Condition

Each weapon to be fired is strip-cleaned and function-checked by its issued TM in the presence of the TL. Any fault, doubt, or irregularity aborts the test fire for that weapon. The weapon is not fired until the fault is corrected or the weapon is replaced from armoury stock.

9.3 Briefing

The TL briefs all personnel – TMs, Master, and any observing crew at the Master's direction – on the BRAG (SM/CAM/BRAG/010) and this procedure. The brief covers firing arc, safety zone, muzzle discipline, make-safe drill, abort signals, and the prohibition on Master/crew contact with weapons. Each TM signs FORM/018 acknowledging the brief before firing commences.

9.4 Safety Zone

The TL establishes a safety zone on deck. Only PCASP are permitted inside the safety zone during firing. Master and crew remain at a distance specified by the TL, behind cover where possible, and do not approach at any point during the evolution. Any breach of the safety zone aborts the test fire.

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9.5 Master Signature on FORM/018

The Master signs FORM/018 before firing begins. The signature confirms the Master's request for the test fire, the Master's acceptance of the residual risk, and the Master's indemnification of the Company for any consequence arising from the test fire. Without the Master's signature, no test fire may take place.

9.6 Safety App Reporting Capability

Before firing, the Team Leader confirms with the Master that vessel internet or satellite communications access is available on the bridge during and after the test fire. This access is required so that the TL can submit a Safety App report at report.seagullmaritime.com in the event of a near miss, incident, or concern.

The TL does not require the Master or crew to register for the app during the evolution. The only requirement is that the TL has the means to send a report if one is needed. Formal app briefing and registration for vessel crew remains a separate awareness activity handled outside the test fire evolution.

Where internet or satellite communications access cannot be made available, the test fire does not proceed. This control is not optional and cannot be waived by the TL, the Master, or Operations. Any near miss, incident, or abort during or after the evolution is reported via the Safety App at the earliest opportunity, in addition to FORM/019.

10. CONDUCT OF TEST FIRE

10.1 Firing Sequence

TMs fire in sequence. TM1 completes all rounds, makes safe, and the weapon is inspected and confirmed safe by the TL before TM2 commences. No parallel firing under any circumstances. The TL does not fire during the evolution.

10.2 Ammunition Cap

Maximum five rounds per weapon. Rounds are counted into the magazine by the TL before the Firer takes the weapon. The TL confirms the round count on FORM/018. Discharging more than five rounds from any weapon constitutes a breach of this procedure and is recorded on FORM/019 for GCD review.

10.3 Firing Mode – Single Shot Only

Single-shot firing only. Semi-automatic, burst, and automatic firing modes are prohibited under all circumstances during a test fire. The weapon is set to single-shot / safe between rounds. Any discharge in any other mode constitutes a breach of this procedure and triggers automatic suspension of the Firer pending GCD review.

10.4 TL Supervisory Duties

Positions to maintain clear line of sight to the Firer, the weapon, the firing arc, and the safety zone. Calls each shot. Confirms target direction is a safe firing arc – open water, clear of any vessel, aircraft, coastline, or sensitive feature.

Maintains continuous position check against Section 8 exclusions. Aborts on any change.

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Calls make-safe at the end of each TM's firing. Confirms make-safe by physical inspection before the next TM begins.

10.5 Abort Authority

The TL retains abort authority at all times. The evolution is aborted on any one of: exclusion becoming active, vessel entering field of fire, aircraft overhead, weapon malfunction, Firer error, safety zone breach, radio alert (UKMTO / MSCHOA / NATO), or any other concern identified by the TL. Abort is immediate and unconditional. The TL records the abort and reason on FORM/019.

11. WEAPONS HANDLING AND ACCESS

Weapons remain under PCASP control at all times during the evolution. The Master, officers, and crew of the vessel are prohibited from handling, holding, posing with, approaching, or otherwise coming into contact with any Company-issued weapon at any point before, during, or after the test fire.

This prohibition is absolute and is not waived by Master instruction, client request, or prior practice. Any attempt by the Master or crew to breach this control aborts the evolution and is recorded on FORM/019 for GCD review and onward incident reporting under SM/INT/PRO/006.

12. POST-FIRE ACTIONS

12.1 Make Safe and Inspection

Each weapon is made safe by the Firer immediately on completion of firing and presented to the TL for inspection. The TL confirms weapon is clear, on safe, magazine removed, and chamber empty. The weapon is then returned to armoury stowage under PCASP control.

12.2 Rounds Reconciliation

The TL reconciles rounds expended against the ammunition cap and the armoury log. Any discrepancy is recorded on FORM/019 and reported to Operations and GCD immediately.

12.3 FORM/019 Weapons Discharge Report

The TL completes SM/OPS/FORM/019 Weapons Discharge Report within 24 hours of the test fire. The report captures weapon serial, Firer, rounds expended, firing location, any irregularity, and make-safe confirmation. FORM/019 is filed with Operations by email at the earliest opportunity.

12.4 Operations and 1Clearview Update

Operations updates 1Clearview with the test fire record on receipt of FORM/018 and FORM/019, and reconciles armoury stock against rounds expended. The GCD reviews both forms and files them in the Company test fire register.

13. NON-COMPLIANCE AND ENFORCEMENT

Any failure by a PCASP member to comply with this procedure, the BRAG, the RA, or the TL's instructions during a test fire evolution constitutes a serious breach of Company policy. The consequences include but are not limited to suspension from duty pending GCD review, FCC review, disciplinary action up to and including termination of contract, and referral under SM/INT/POL/002 Code of Conduct.

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Any conduct of a test fire without GCD (or CEO) written authorisation, including any test fire initiated by Ops, Compliance (other than GCD), client, Master, TL, or any other party, is a serious breach. It is treated as an unauthorised weapons discharge, reported under SM/INT/PRO/006 Incident and Crisis Management, and subject to NCR investigation under SM/INT/PRO/001.

Any handling of a Company-issued weapon by a non-PCASP person at any stage of an evolution is a serious breach and triggers immediate incident reporting.

14. LEGACY PROVISION

Where legacy Standard Operating Procedures, client-agreed procedures, or pre-existing correspondence reference test firing as a permitted or routine activity, those references are superseded by this procedure with effect from 14 April 2026.

Any client, Master, or PCASP operating under a legacy reference must apply this procedure in full. Operations will communicate the superseding position to affected clients on contract review or at the earliest operational opportunity.

15. RELATED DOCUMENTS

SM/OPS/SOP/001 – Standard Operating Procedures, Indian Ocean
SM/OPS/PRO/001 – Rules on the Use of Force
SM/HSE/RA/011 – Test Fire at Sea Risk Assessment
SM/CAM/BRAG/010 – Test Fire BRAG
SM/OPS/FORM/018 – Test Fire Authorisation and Acknowledgement Form
SM/OPS/FORM/019 – Weapons Discharge Report
SM/INT/PRO/001 – NCR/OFI/CAPA Management
SM/INT/PRO/006 – Incident and Crisis Management
SM/INT/POL/002 – Code of Conduct
SM/SEC/POL/002 – Human Rights Policy
SM/INT/REG/008 – Training and Competence Matrix