Technical Circular

Subject: RMI SSA No. 02-22 (Rev.7) Reg. Geopolitical conflict – Ukraine, Black Sea, Sea of Azov.

1. On 25th March 2022, the Russian Federation announced establishment of a **'blue safe maritime corridor'** to be used for the humanitarian evacuation of commercial vessels and seafarers stuck at Ukrainian ports from the Odessa region out into the Black Sea.

2. Republic of Marshall Islands (RMI) Maritime Administration, vide Ship Security Advisory No. 02-22 (Rev.7) has informed that:

   a) The above establishment of a 'blue safe maritime corridor' is a unilateral initiative by Russia which has not yet been agreed to by the Ukrainian government.
   b) All Ukrainian ports currently remain closed, and no arrivals/departures are permitted.
   c) The approaches to Ukrainian ports currently present a high risk due to the recent laying of floating mines; and
   d) There is no assurance of safety for ships using 'blue safe maritime corridor'.

   Accordingly, the Administration has advised **RMI-registered vessels to avoid use of the Russian corridor at this time.**

3. Further, in view of the increased naval activity within the Black Sea and Sea of Azov, RMI Administration requires, **with immediate effect;**

   a) Setting of **Ship Security Level III** (or equivalent security measures) for all RMI flagged vessels operating in the exclusive economic zone (EEZ) of Ukraine.

   b) Setting of **SHIP SECURITY LEVEL II** (or equivalent security measures) for RMI flagged vessels in the Black Sea EEZ of Russia. Commercial vessels should not attempt to enter the Sea of Azov or the Northwest Black Sea north of 45° 21' since access will be denied by Russian military forces. This advisory is subject to change as the dynamic situation progresses.

   c) Ships intending to call at a port/port facility in the areas depicted below must ensure that security measures equivalent to Ship Security Level II or III are implemented as per the Ship Security Plan. If cargo operations at Russian ports in the Black Sea are necessary, a Declaration of Security should first be carried out with the Port Facility Security Officer (PFSO).

d) Ships currently located at Ukrainian ports must remain in place until permission to depart is granted by the Ukrainian military. Security measures equivalent to Security Level III must be implemented while held at port. Lights should be switched off at night or kept to a bare minimum. Masters should assess whether to switch AIS off due to imminent security threat while stuck alongside or within Ukrainian port limits. This may help mitigate the risk of unintentional GPS-guided targeting by military forces.

4. Further, the Administration has provided following guidance/ information for owners/ managers and masters of RMI flagged vessels in this regard:

   a) Commercial vessels are advised to avoid any transit or operation within the EEZ of Ukraine or Russia within the Black Sea. Access to the Sea of Azov through the Kerch Strait is currently blocked by Russian forces.

   b) All Ukrainian ports have been closed by the Ukrainian military. Commercial ships may not enter or leave port at this time.

   c) Access to the northwest Black Sea, north of 45° 21' is restricted by the Russian Navy. Transit in this area should not be attempted.

   d) Commercial operations within the EEZ of Turkey, Bulgaria, Georgia and Romania are currently unaffected by the conflict.

   e) Vessels should ensure the automatic identification system (AIS) is always transmitting (except when the master believes that continuing to operate AIS might compromise the safety or security of the ship or when a security incident is imminent), consistent with provisions of the International Convention for the Safety of Life at Sea (SOLAS), and monitor VHF.

   f) Any vessels hailed by military vessels should comply fully with instructions.

   g) Armed security personnel are not to be embarked while operating in the Black Sea.

5. In the event of any incident or suspicious activity, RMI-flagged vessels should immediately notify the Administrator, the NATO Shipping Center (NSC) and activate the Ship Security Alert System.

6. Suspected or confirmed cyber or electronic interference incidents must be reported to the Administrator and the NSC.

7. Owners/ managers and masters of RMI flagged vessels are advised to take note of the above requirements and ensure compliance.

8. **This Technical Circular supersedes and revokes earlier Technical Circular No. 025/2022, dated 01 April 2022.**

Enclosure:

1. RMI Ship Security Advisory No. 02-22, dated 04 April 2022.

Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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SHIP SECURITY ADVISORY No. 02-22 (Rev. 7)

To: **Owners/Operators, Masters, Company Security Officers, Recognized Security Organizations**

Subject: **GEOPOLITICAL CONFLICT - UKRAINE, BLACK SEA, SEA OF AZOV**

Date: **04 April 2022**

1.0 LATEST DEVELOPMENTS

1.1 International Maritime Organization (IMO) Resources: Maritime Security in the Black Sea and Sea of Azov

In response to the ongoing conflict between the Russian Federation and Ukraine, the IMO established an Emergency Task Force (ETF) to coordinate the mitigation of security and safety risks to shipping in the Black Sea and Sea of Azov. As a result, the IMO Secretariat now maintains a dedicated page on the IMO website for the provision of current information and guidance to the international shipping community.

1.2 Blue Safe Maritime Corridor

During the Extraordinary Session of Council (C/ES 35) held on the 10th and 11th of March, the IMO Council agreed to encourage the establishment of a 'blue safe maritime corridor' in the Black Sea to be used for the humanitarian evacuation of commercial vessels and seafarers stuck at Ukrainian ports. The IMO Secretary-General indicated his commitment to take immediate action to realize the blue safe maritime corridor with the cooperation and collaboration of the relevant parties, including littoral states.

On the 25th of March, the Russian Federation sent a communication to the IMO (see Circular Letter No. 4543) announcing the proposed establishment of a blue safe maritime corridor from the Odessa region out into the Black Sea. The corridor begins at an assembly area outside of the territorial waters of Ukraine and extends 80 miles on a course of 200° SSE.

NOTE: This is a unilateral initiative by Russia which has not yet been agreed to by the Ukrainian government (see Circular Letter No.4544) . All Ukrainian ports currently remain closed, and no arrivals/departures are permitted. Also, the approaches to Ukrainian ports currently present a high risk due to the recent laying of floating mines. There is no assurance of safety for ships using this corridor. Therefore, **Republic of the Marshall Islands (RMI) registered vessels are advised to avoid use of the Russian corridor at this time.**

This SSA is evaluated annually by the Administrator and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.

1.3 Floating Mines

As per the most recent guidance from the NATO Shipping Center (NSC), NAVAREA III Warnings, and local sources, the following incidents have recently occurred in the Black Sea. Please note that these incidents may not be related to the conflict in Ukraine:

28 March 2022: The Romanian navy disposed of an unidentified floating mine 40-45 NM off Capu Midia, Romania. Local media reports, citing Romanian naval sources, have stated that a floating naval mine of unknown type and origin was found 40 NM off the Romanian city of Midi, North of Constanta. A Romanian minesweeper disposed of the mine. Unconfirmed reports on social media have said the markings on the mine is consistent with a Ukrainian YaM type mine based off a 1943 Soviet design. Any connection to the conflict in Ukraine is unconfirmed. *(Source: Risk Intelligence)*

28 March 2022: The Turkish navy disposed of a suspected naval mine off Igneada, Turkey. The Turkish navy stated that the mine was found floating near the maritime border with Bulgaria, and that a demolition team disposed of the mine. *(Source: Risk Intelligence)*

26 March 2022: Traffic was suspended in both directions while the Turkish authorities investigated reports of a mine spotted in the vicinity of the dry cargo vessels anchorage area just north of the Bosphorus at 11:30 LT (08:30 UTC). Turkish authorities confirmed a dive team had deactivated an old naval mine. Traffic resumed at 16:15 LT (13:15 UTC). *(Source: Risk Intelligence)*

2.0 SECURITY LEVELS

2.1 The RMI Maritime Administrator (the "Administrator") is currently requiring a setting of **SECURITY LEVEL III (**or equivalent security measures) for all RMI-registered vessels operating in the exclusive economic zone (EEZ) of Ukraine.

2.2 RMI-registered vessels in the Black Sea EEZ of Russia are required to operate at a setting of **SECURITY LEVEL II** (or equivalent security measures). Commercial vessels should not attempt to enter the Sea of Azov or the Northwest Black Sea north of 45° 21' since access will be denied by Russian military forces. This setting is subject to change as the dynamic situation progresses.
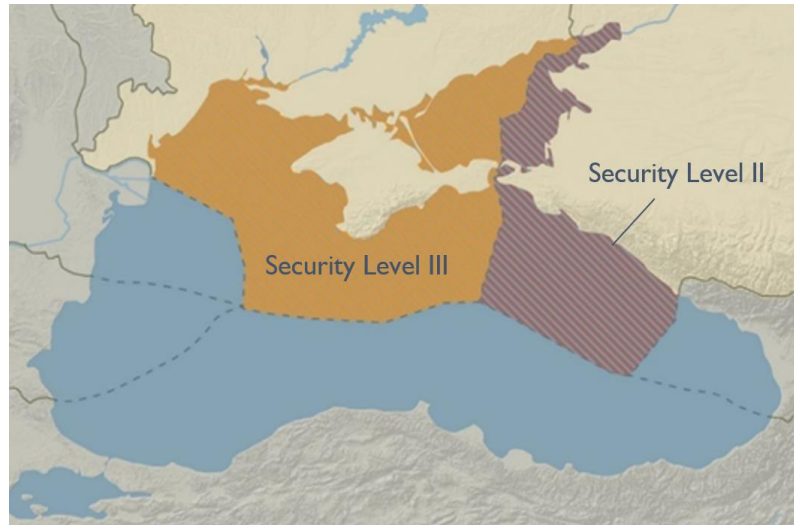
2.3   Ships intending to call at a port/port facility in the areas depicted above must ensure that security measures equivalent to Ship Security Level II or III are implemented as per the Ship Security Plan. If cargo operations at Russian ports in the Black Sea are necessary, a Declaration of Security should first be carried out with the Port Facility Security Officer (PFSO).

2.4   Ships currently located at Ukrainian ports must remain in place until permission to depart is granted by the Ukrainian military. Security measures equivalent to Security Level III must be implemented while held at port. Lights should be switched off at night or kept to a bare minimum. Masters should assess whether to switch AIS off due to imminent security threat while stuck alongside or within Ukrainian port limits. This may help mitigate the risk of unintentional GPS-guided targeting by military forces.

3.0   THREATS

3.1   On the 24th of February 2022, an RMI registered bulk carrier suffered significant damage to the deck and bridge area whilst drifting approximately 50 nautical miles (nm) South of Odessa, Ukraine. Pending further investigation, the damage is initially thought to be caused by a missile. No crew casualties or hull damage was reported. The vessel is at a safe location for further inspection, investigation, and repairs.

3.2   Multiple commercial vessels have since been hit by missile attacks and shelling at or near Ukrainian ports and territorial waters. Refer to Dryad Global – Reports of Vessels Targeted off Ukraine

3.3   NAVAREA III Warnings indicate the presence of floating mines in the western Black Sea near Ukrainian shores. Additional information has been published by the NSC.

4.0   GUIDANCE

4.1   Commercial vessels are advised to avoid any transit or operation within the EEZ of Ukraine or Russia within the Black Sea. Access to the Sea of Azov through the Kerch Strait is currently blocked by Russian forces.

4.2   All Ukrainian ports have been closed by the Ukrainian military. Commercial ships may not enter or leave port at this time.

4.3   Access to the northwest Black Sea, north of 45° 21' is restricted by the Russian Navy. Transit in this area should not be attempted.

4.4   Commercial operations within the EEZ of Turkey, Bulgaria, Georgia, and Romania are currently unaffected by the conflict.

4.5   Vessels should ensure the automatic identification system (AIS) is always transmitting (except when the master believes that continuing to operate AIS might compromise the safety or security of the ship or when a security incident is imminent), consistent with provisions of the International Convention for the Safety of Life at Sea (SOLAS) and monitor VHF.

4.6   Any vessels hailed by military vessels should comply fully with instructions.

4.7   Armed security personnel are not to be embarked while operating in the Black Sea.

5.0   RESOURCES

.1   [NAVAREA III Warnings in Force (defensa.gob.es)](#)

.2   NATO ATP2: [NCAGS' Guide to Owners, Operators, Chapter 4](#)

.3   [OCIMF's *Ship Security: Hull Vulnerability Study*](#)

6.0   REPORTING

6.1   In the event of any incident or suspicious activity, RMI-flagged vessels should immediately notify the Administrator, the [NSC](#), and activate the Ship Security Alert System.

6.2   Suspected or confirmed cyber or electronic interference incidents must be reported to the Administrator ([MI-109-5)](#) and the [NSC](#).

7.0   CONTACTS

.1   NATO Shipping Centre: info@shipping.nato.int
                                                    +44 (0) 1923-956574
                                                    Report in [Format A](#)

.2   RMI Maritime Administrator: shipsecurity@register-iri.com
                                                    dutyofficer@register-iri.com
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8.0 REFERENCES

.1 IMO Resources: Maritime Security in the Black Sea and Sea of Azov

.2 NATO Shipping Centre - Risk of Collateral Damage in the Northwest Black Sea

.3 U.S. Maritime Advisory No. 2022-004 - Black Sea and Sea of Azov

.4 Joint War Committee – JWLA-030 - Russia

.5 Dryad Global - Reports of Vessels Targeted off Ukraine

.6 NATO ATP2: NCAGS' Guide to Owners, Operators, Chapter 4

Please direct any questions or concerns to Marshall Islands Maritime Security.