Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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SHIP SECURITY ADVISORY No. 02-22 (Rev. 9)

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

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

Date: **10 August 2022**

1.0   LATEST DEVELOPMENTS

1.1   Black Sea Grain Initiative

1.1.1   Ukraine, Russia, Turkey, and the United Nations (UN) have signed an agreement on the shipment of grains and fertilizer from some Ukrainian ports, commonly referred to as the Black Sea Grain Initiative (the "initiative"). The initiative is currently being implemented under the supervision of a Joint Coordination Centre (JCC) in Istanbul. The JCC is comprised of representatives from Ukraine, Russia, Turkey, and the UN.

1.1.2   The Ukrainian ports of Chornomorsk, Odessa, and Pivdennyi (ex. Yuzhny) have been opened for use by the initiative, and a Maritime Humanitarian Corridor has been established for safe passage of merchant ships through the restricted zone.

1.1.3   The JCC issued detailed procedural guidance for the export of goods from Ukraine.

1.1.4   All exports and vessel traffic through the Maritime Humanitarian Corridor must be authorized and monitored by the JCC. Inspection of ships using the initiative is conducted at anchorage off Istanbul by the JCC.

1.1.5   Multiple vessels have used the initiative since 1 August 2022. Vessel movement to and from Ukrainian ports can be monitored on a dedicated UN webpage.

1.1.6   The frontlines are still close to the major port cities of Nikolaev and Kherson, controlled by Ukraine and Russia respectively, with shelling of Nikolaev occurring regularly.

1.1.7   The Sea of Azov remains closed for navigation, although some vessels are allowed by Russian authorities to transit the area.

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is evaluated annually by the Administrator and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.

1.1.8   According to Russian officials, the occupied Ukrainian ports of Berdyansk and Mariupol are open and operating. However, traffic is very limited.

1.1.9   The Danube River ports of Izmail, Reni and Ust-Dunaisk are operating and handling ship calls via the river and the Sulina Canal.

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

1.2.1   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.

1.3   Floating Mines

1.3.1   Convoys arranged by the JCC to safely guide vessels around floating mines by using pilots and tugs through the Maritime Humanitarian Corridor.

1.3.2   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)*

30 June 2022: NATO Shipping Centre reported that a possible mine was sighted about 25 NM SE of Varna, Bulgaria. The object was confirmed as a stray mine and was neutralized by the Bulgarian Navy.

1.3.3 Due to the reported mine threat in the North and Western Black Sea, the Romanian Coast Guard advise all vessels approaching and leaving Romanian ports and harbors to use position 43- 4759 N, 28-5086 E and to follow the recommended tracks outlined below:

**Mangalia:** 43-47.59 N, 28-5086 E; 43-4759 N, 28-37.61 E

Constanta: 43-4759 N, 28-5086 E; 44-11.33 N, 28-5086 E; 44-1552 N, 28-45.04 E

Sulina: 44-0057 N, 28-5087 E; 44-2693 N, 29-4320 E; 44-36.49N, 29-5256 E; 45-05.89N, 29- 5256 E; 45-0804 N, 29-4758 E

Vessels should maintain lookouts for mines and report all detections using radio frequency 16/VHF, contact the Romanian Maritime Hydrographic Directorate, the Romanian Coast Guard and MRCC Constanta.

2.0 SECURITY LEVELS

2.1 The RMI Maritime Administrator (the "Administrator") currently requires 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.
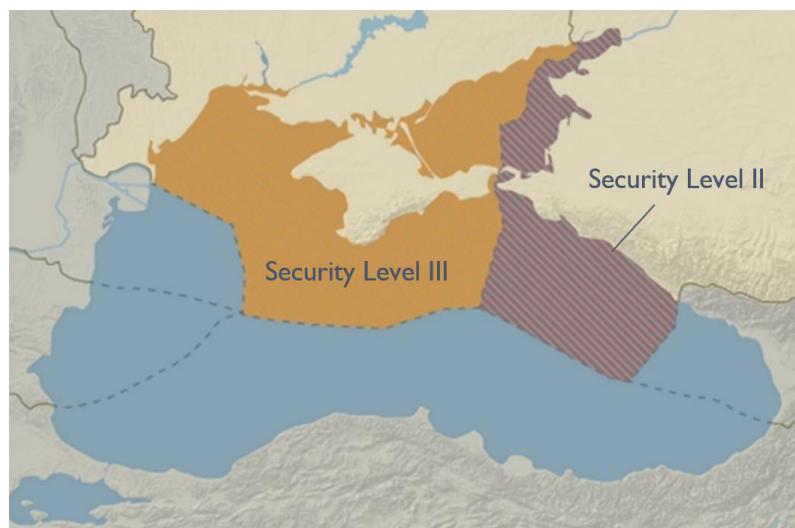
2.3   Ships intending to call at a port/port facility in the areas depicted above must ensure that security measures equivalent to Ship Security Level II or III are implemented as per the Ship Security Plan. If cargo operations at Russian ports in the Black Sea are necessary, a Declaration of Security 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   TARGETED VESSELS AND SEAFARERS

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 in the Black Sea and Sea of Azov. It is not always clear if these are targeted attacks or collateral damage.

3.3   Vessels manned by Ukrainian crew may experience additional scrutiny and possible interrogation when calling at Russian ports.

3.4   Russia has adopted several decrees imposing prohibitions and restrictions on the export of goods from Russia. This may increase the risk of ships with a connection to Western states being detained and confiscated in Russian ports. In a 25 March 2022 alert, the Norwegian Maritime Authority (NMA) reported that ships have already been detained at Russian ports and recommends that ship operators and masters, when planning to call at ports in Russia, consider the content of the Russian decrees, as well as the risk of being selected for a port state control inspection, and possibly detention. It is recommended that operators and masters, prior to fixing a cargo, check with their local agents in Russia to confirm whether cargo is covered by the prohibitions in force.

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 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*](#)

.4   Wilhelmsen: [Ukraine-Russia Port Situation Map](#)

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
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8.0   REFERENCES

.1   United Nations: Black Sea Grain Initiative Updates

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

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

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

.5   Joint War Committee – JWLA-030 - Russia

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

Please direct any questions or concerns to RMI Maritime Security.