Republic of the Marshall Islands

MARITIME ADMINISTRATOR

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SHIP SECURITY ADVISORY No. 06-23

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

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

Date: **21 August 2023**

This Ship Security Advisory (SSA) supersedes SSA No. 02-22.

1.0   LATEST DEVELOPMENTS

1.1   Termination of the Black Sea Grain Initiative (BSGI)

1.1.1   The Republic of the Marshall Islands (RMI) Maritime Administrator (the "Administrator") has raised the security level setting for vessels operating within the Russian exclusive economic zone (EEZ). Please see §2.0 for details.

1.1.2   The BSGI was terminated after Russia exited the agreement on 17 July 2023. Russian authorities stated that they would be unable to guarantee the security of vessels in the north-western Black Sea. A further statement from the Russian Ministry of Defence issued on 19 July warned that, "all ships en route to Ukrainian ports in Black Sea waters will be considered as potential carriers of military cargo," and that "flag states of such ships will be considered involved in the Ukrainian conflict on the side of the Kyiv regime."

1.1.3   Since the collapse of the BSGI, strikes have targeted port infrastructure in Odesa, Chornomorsk, Mykolaiv, and the Danube River port of Reni. Reports also indicate that Russia has deployed additional naval mines on the approaches to Ukrainian ports, effectively closing corridors that were previously cleared for the BSGI.

1.1.4   In response, the Ukrainian Ministry of Defence stated that, "all vessels heading in the waters of the Black Sea in the direction of seaports of the Russian Federation and Ukrainian seaports located on the territory of Ukraine temporarily occupied by Russia may be considered by Ukraine as… carrying military cargo with all the associated risks."

1.1.5   Ukraine has established a humanitarian corridor to allow for the departure of merchant vessels that have been stuck at Ukrainian ports. The Russian military has not guaranteed the safety of ships using this corridor, so using it comes with significant risk. Additional information on the corridor has been submitted to the International Maritime Organization (IMO) by the Ukrainian Government in IMO Circular Letter No. 4748.

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

1.2   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   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:

> **15 August 2023:**   A floating mine drifted ashore and detonated when it hit rocks near Constineci, Romania. *(Source: Risk Intelligence)*
>
> **15 May 2023:**   A floating mine was sighted in the Black Sea about 11 nautical miles (NM) off Sulina, Romania. *(Source: Risk Intelligence)*
>
> **13 April 2023:**   The Romanian navy destroyed what is believed to be a naval mine 8 NM off Midia, Romania**.** *(Source: Risk Intelligence)*
>
> **07 February 2023:**   A floating mine detonated at Agva, Turkey at an unknown time on 07 February 2023. *(Source: Risk Intelligence)*
>
> **24 January 2023:**   A floating mine was defused by the Bulgarian Navy 14.8 NM east of the Bulgarian coast near Cape Kochan. *(Source: Risk Intelligence)*

1.3.2   Due to the reported mine threat in the North and Western Black Sea, the Romanian Coast Guard advises 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 very high frequency (VHF) radio Channel 16, contact the [Romanian Maritime Hydrographic Directorate](#), the [Romanian Coast Guard,](#) and [Maritime Rescue Coordination Center (MRCC) Constanta](#).

2.0   SECURITY LEVELS

2.1   The Administrator currently requires a setting of **SECURITY LEVEL III (**or equivalent security measures) for all RMI-registered vessels operating in the EEZ of Ukraine.

2.2   Due to recent attacks on the port of Novorossiysk, and the threat of additional attacks on merchant vessels, RMI-registered vessels in the Black Sea EEZ of Russia are required to operate at a setting of **SECURITY LEVEL III** (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 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).
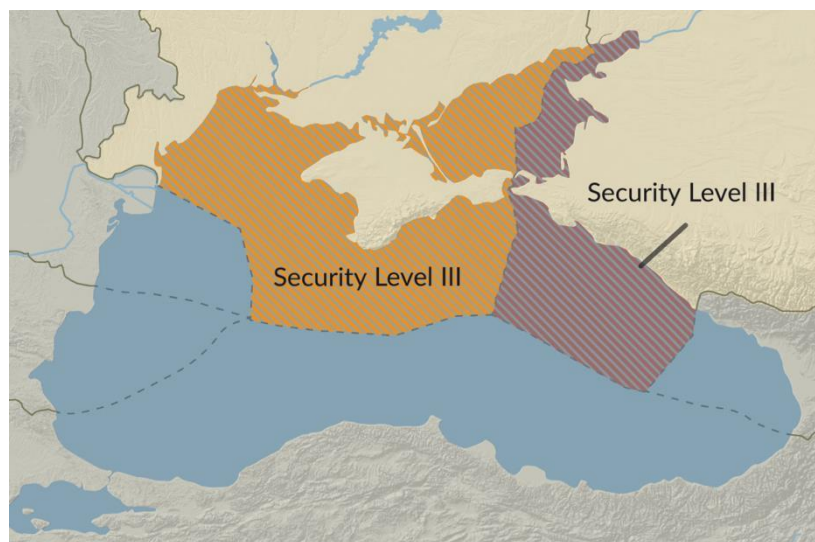
2.4   Ships currently located at Ukrainian ports must remain in place until permission to depart is granted by the Ukrainian military.

2.5   Lights should be switched off at night or kept to a bare minimum.

2.6   Masters should assess whether to switch off the automatic identification system (AIS) due to an 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 24 February 2022, an RMI-registered bulk carrier suffered significant damage to the deck and bridge area while drifting approximately 50 NM South of Odessa, Ukraine. Pending further investigation, the damage was initially thought to be caused by a missile.

No crew casualties or hull damage was reported. The vessel moved to 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 should 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, unless individually cleared to do so by Ukrainian authorities.

4.3 Access to the northwest Black Sea is restricted by the Russian Navy. Transit in this area should not be attempted.

4.4 Vessels should ensure the AIS is always transmitting (except when the master is concerned 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.

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

4.6 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: marsec@register-iri.com
                                     dutyofficer@register-iri.com
                                     +1 571 441 1885

8.0   REFERENCES

.1   United Nations BSGI 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   United States Maritime Advisory No. 2022-004, *Black Sea and Sea of Azov*

.5   Joint War Committee Circular JWLA-030 - Russia

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

Please direct any questions or concerns to RMI Maritime Security.