

Circular From GARD**Date: 24 March 2022****Update on Ukraine 17 March**

The ongoing hostilities in Ukraine will have a considerable impact on vessels calling ports in the Black Sea and the Sea of Azov. The situation remains fluid and is changing by the hour.

This Alert was last updated on 17 March 2022 at 12.30 hrs GMT/13.30 hrs CET.

Key updates on the maritime situation in Ukraine

According to information received from Gard's local correspondents, other service suppliers, as well as open sources, the situation in Ukraine, Azov Sea, and Black Sea is reported to be as follows:

- The Sea of Azov is closed to commercial vessels, likely to be enforced by Russian naval forces at the Kerch Strait.
- Access to the north-western part of the Black Sea, north of 45° 21' parallel, is prohibited by the Russian Navy.
- All Ukrainian ports are reported closed for operation. As per [IMO Circular Letter No.4518](#), the Ukrainian government has advised that all ports are now at MARSEC level 3 and are "closed for entry and exit".
- There are reports of mines being laid in the North-Western part of the Black Sea near Ukrainian shores. Masters are recommended to obtain the relevant [NAVAREA III](#) warnings relating to mined areas and contact the local port authorities and ships agents for additional information.
- Combat in or near Ukrainian ports, with strikes against port infrastructure, may occur, with crews and vessels in Ukrainian ports being prone to collateral damage. There are reports that a few vessels have sustained damage due to shelling.
- Operation of all Russian ports based in the Black Sea is continuing in a routine manner, although their ISPS Security Level may have been raised. If cargo operations at Russian ports in the Black Sea are absolutely necessary, it is recommended that a Declaration of Security is first carried out with the Port Facility Security Officer (PFSO).
- Commercial operations within the EEZs of Turkey, Georgia, Bulgaria and Romania remain unaffected at this time.
- Transit of crew into port cities may be affected by combat operations; roads may be blocked, and airports and airspace are closed, further limiting transit.

We will update this section as and when we receive further updates. However, as the situation may change

quickly, we strongly recommend that ship operators and masters trading to ports in the Black Sea region make frequent checks with local sources of information, e.g. vessel's agent, Gard's correspondent, etc., to obtain the most up to date and reliable security information available at any given time. The shipping company [Wilhelmsen](#) also provides regular and useful updates on the latest port restrictions and updates in the Black Sea region.

Navigation related challenges and precautions

The US Maritime Administration (MARAD) in their [Advisory 2022-004](#) has indicated that vessels may encounter GPS interference, AIS spoofing, and/or other communications jamming when navigating in the Black Sea and the Sea of Azov. Additional guidance for vessels experiencing GPS interference can be found in MARAD [Advisory 2022-005](#). There are also reports that electronic warfare may be employed. If so, then it may affect electronic systems on vessels.

Vessels are also likely to encounter disruption due to navigational restrictions in this region. At the time of writing, AIS data indicates a reduction in traffic since the start of the conflict and decreasing concentrations of vessels. However, there could still be a build-up of vessels either at anchor or drifting, e.g. on either side of Bosphorus Strait, and vessels are advised to maintain safe distance from other vessels, keep a sharp lookout and have their engines ready for manoeuvring.

Maritime Security

The situation remains volatile and changing and we recommend all vessels operating in the relevant areas to carefully assess the situation, exercise caution, and review their relevant contingency plans, including the crisis communication plan, in case of an incident. Owners and managers should ensure that seafarers on vessels heading towards the Black Sea region are aware of the security threats in their specific geographical area of trade.

Vessels may have received security information from their flag administrations regarding the ISPS Code security level. As an example, on 24 February 2022 the Norwegian Maritime Authority ([NMA](#)) raised the security level to MARSEC/ISPS 3 for Norwegian flagged vessels operating in the northern part of the Black Sea and the Sea of Azov. Marshall Island did the same for their vessels trading in the EEZ of Ukraine in their [Ship Security Advisory 02-22](#). If such instructions are not received, it is recommended to pursue this with the vessel's flag administration. Additional instructions and notices from flag administrations can also be downloaded from the Lloyd's Register website: [Latest information received from Flag States relating to Ukraine](#). However, we strongly advise operators and masters to maintain contact with their flag administrations in order to receive their most recent instructions available at any given time.

On 28 February 2022, we received reports that armed personnel purporting to be Russian immigration officers had come onboard a vessel berthed at a Russian non-Black Sea port and taken ashore part of the Ukrainian crew for questioning. Russian armed personnel stayed on board and the remaining Ukrainian crews onboard were reportedly also questioned. While all Ukrainian crew members are now reported to be safely back onboard the vessel, and this may be a one-off incident, masters should note that vessels manned by Ukrainian crew may experience additional scrutiny by Russian authorities, and possible interrogation of

such crew members, when calling at Russian ports.

Vessels should ensure they are broadcasting on AIS and clearly state their intentions across VHF, consistent with provisions of SOLAS and their flag administration, and monitor VHF Channel 16. However, pursuant to [IMO guidelines](#), *“if the master believes that the continual operation of AIS might compromise the safety or security of his/her ship or where security incidents are imminent, the AIS may be switched off. The date, location and time the AIS is switched off should be recorded in the ship's logbook together with the reason for doing so and the master should restart the AIS as soon as the source of danger has disappeared”*.

In the event of any incident or suspicious activity, vessels should notify its flag administration and the NATO Shipping Center ([NSC](#)). Any vessels challenged by military vessels should comply fully with their instructions.

It is worth noting that an existing NATO document on the interaction between naval forces and merchant ships: [ATP-02.1 Naval Cooperation and Guidance for Shipping \(NCAGS\)](#), may be relevant in the current situation. While NATO is not a party to the conflict, the publication contains a lot of valuable information about the many factors to consider when navigating in areas of armed conflict or war. Relevant advice may also be taken from Appendix A of the [Global Counter-Piracy Guidance](#), which outlines non-piracy threats. BIMCO has also established a [Ukraine/Russia hub](#) that provides general guidance and resources for the shipping industry.

Ukraine and Russian waters added to JWC listed areas

As a result of the war in Ukraine, *Ukrainian and Russian waters in the Black Sea and the Sea of Azov* have been included in the latest revision to the list of Hull War, Piracy, Terrorism and Related Perils Listed Areas ([JWLA-029](#)) by the Joint War Committee (JWC) which was last revised on 7 March 2022. Owners are advised to get in touch with their war risk insurers when calling any port falling within the above-mentioned region.

The [Warlike Operations Area Committee](#) (WOAC) comprising of UK Chamber of Shipping, Nautilus International and the RMT union, has declared all Ukrainian, Russian and International Waters north of 44°North in the Black Sea as ‘warlike operations area’.

We thank our Ukrainian correspondent, Dias Marine Consulting PC, and Russian correspondent, Novorossiysk Insurance Company Nostra Ltd. for their assistance in preparing this alert.

Source of Information: The Gard P&I Club