



War in Ukraine – impact on maritime situation

Updated 21 March 2025

Despite recent talks of a cease-fire between Ukraine and Russia, the situation in the Black Sea region remains unstable, particularly in the northwestern part. We continue to recommend that all port calls in the region be assessed on a case-by-case basis and relevant protective measures be incorporated into ship security and contingency plans.

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Key updates

The overall regional threat picture have not changed since our previous update in September 2024, and the situation in the Black Sea region is described as follows:

Port situation

- The <u>UN Black Sea Grain Initiative (BSGI)</u> was terminated in July 2023. Please refer to the <u>UN press release of 17 July 2023</u> for details of the current situation.
- Since the termination of the BSGI, Ukraine has established and operates what is referred to as a "temporary humanitarian corridor" to its ports in the northwest of the Black Sea. See<u>IMO Circular Letter 4748</u> for details. However, as Russia has not indicated its support for this initiative, and has provided no security guarantees, the risks of using the corridor may be higher compared to the BSGI.
- According to the NATO Shipping Centre (<u>NSC</u>), the threat of collateral damage or direct hits on civilian shipping in the war risk area (<u>NAVAREA III warning 0124/2022</u>) in the northern part of the Black Sea, west of Crimea, remains high.
- In addition, the NSC also considers the threat of GPS jamming, AIS spoofing, communications jamming, electronic interference and cyber-attacks in the area as high, and warns that harassment and diversion of shipping cannot be excluded.
- While some of the Ukrainian Danube ports are reported to be open and operational, vessels and crews may be vulnerable to collateral damage due to strikes against port infrastructures. It is also worth noting that the Ukrainian government has advised the IMO that all its ports are at ISPS Security Level 3.
- The Russian Black Sea ports are reported to be operational, however, the ports' ISPS Security Level may be raised.
- Whilst Ukrainian seafarers may not be granted shore in leave in Russian ports, Russian authorities have announced that Ukrainian seafarers can enter Russian ports onboard ships for the purpose of work onboard that ship. However, Masters should note that vessels manned by Ukrainian crew have occasionally experienced additional scrutiny by Russian authorities, and possible interrogation of such crew members, when calling at Russian ports.
- Commercial operations within the EEZs of Turkey, Georgia, Bulgaria and Romania are reported to continue, however also these ports' ISPS Security Level may be raised. Vessels trading to Romanian Danube ports may be vulnerable to collateral damage from strikes against port infrastructures on the Ukrainian side of the border.

Mined areas and drifting mines

- The <u>NSC</u> reports that drifting mines are still being detected and deactivated by coastal nations' authorities in the southwest part of the Black Sea.
- Masters of vessels navigating in the western parts of the Black Sea are therefore recommended to make their crews aware of this potential threat, avoiding floating objects, keep the forward area of the vessel clear of crew, and use effective lookouts. All sightings of mine-like objects should be reported to coastal authorities and ships should remain well clear of the hazard.
- Masters are also reminded to monitor the local authorities' broadcasts for the latest Navigational Warnings, obtain all relevant <u>NAVAREA III</u> warnings in force, and contact the vessel's local agents for the latest information.
- Some coastal states, such as Romania, have issued recommendations on the track that vessels should follow when arriving or departing from ports. Vessels are advised to check with their local agents or port authorities regarding such, and use these routes when recommended to do so by the relevant authorities.

We will update this section as and when we receive further updates. However, we strongly recommend that vessel 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.

Maritime security advice

The situation remains volatile and changing and we recommend all vessels operating in these areas to exercise caution, conduct a risk assessment, review security measures, review current NSC, NAVAREA III and other coastal broadcast warnings, and update their relevant contingency plans, including the crisis communication plan, accordingly. 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.

All vessels should continue to receive updated security information from their flag administrations regarding applicable ISPS Code security levels. If such instructions are not received, it is recommended to pursue this with the vessel's flag administration. Contact details for individual maritime authorities by country can be located on the IMO Global Integrated Shipping Information System, <u>GISIS</u>. 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.

The NSC recommends vessels to ensure AIS is transmitting at all times thorughout the Black Sea, 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, the area authorities, and the $\underline{\rm NSC}$. 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 vessels: 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 be taken from Appendix A of the Global Counter-Piracy Guidance, which outlines non-piracy threats.

In our hot topic page "<u>War in Ukraine</u>" we provide an overview of all Gard's relevant loss prevention material, as well as links to some useful external websites and guidelines, that may assist vessel operators, masters, and crews to stay alert and prepare and respond to the ongoing situation in Ukraine and the Black Sea region.

Ukraine and Russian waters added to JWC listed areas

As a result of the war in Ukraine, all ports in Russia and *certain sea areas in the Black Sea and the Sea of Azov *was included in the Joint War Committee's (JWC) list of Hull War, Piracy, Terrorism and Related Perils Listed Areas in April 2022. Owners are advised to get in touch with their war risk insurers when calling any port falling within the above-mentioned region. The latest version of the JWLA, as well as all the committee's bulletins/circulars, are available at the JWC website

The <u>Warlike Operations Area Committee</u> (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'.

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