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外航組員各位

【訂正】ウクライナーバラスト水検査に関する問題の進展（注意喚起）

※赤字部分を訂正して再度、ご案内いたします。

ウクライナにおける環境保護当局検査官によるバラスト水検査に関する問題について、現地コレスポンデント Dias Marine Consulting p.c.より、再度の注意喚起がありましたのでご案内申し上げます。

前回、2018年3月8日付 [Japan P&I News No.948](#)にてお知らせしたとおり、検査官によるサンプル取得の根拠となる規則が2017年に復活し、実際の運用が開始されました。

注意点

- 検査官は分析のためバラスト水サンプルを取得する権利を有する
- 本船側が検査を妨害した場合、検査官が非常に攻撃的になることがある
- 規則変更を知らない船長が検査官ともめて莫大な罰金を課せられた事例が複数ある
- トラブルや過度な罰金を避けるため、検査官のサンプル取得を妨げない

アドバイス

- サンプルがタンクのパイプラインでなく、タンク自体から取られるように確認する
- 黒海進入後**に**バラスト水の張替えを行う
- 錆や汚れを防ぐためバラストタンクの整備を行うべきだが、塗りたてのタンクペイントも分析に悪影響を及ぼす
- 不当な罰金を受けた場合、最善の防衛は本船出帆後に反訴することで、勝訴し、罰金の返還を受け、検査官の野放図な検査を抑制できる可能性がある

同国への寄港を予定されている本船におかれては、添付サーキュラーを参照し、また現地代理店に最新の情報をご確認ください。

各船舶のご安航を祈念いたします。

以上

添付 : Dias Marine Consulting p.c. Circular dated 14 June and 9 July 2018

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Important correction to the latest Notification dd. 14.06.18

Dear Sirs,

We regret to inform you that there is misprint in our latest NOTIFICATION: “New Aspects of Ballast Problems in Ukrainian Ports” dd. 14.06.2018. The phrase “Therefore, we do recommend in order to avoid undue fines not to hinder the Inspectors and to allow them to take the ballast samples but it’s worth to make sure that the samples are taken from the ballast tanks and not from the pipelines (it may also be useful to changes ballast **before entering** the Black Sea and maintain the tanks well so that there is no rust/corrosion/suspended solids in there; fresh paint also will add no good to the analyses results).” Should be read “Therefore, we do recommend in order to avoid undue fines not to hinder the Inspectors and to allow them to take the ballast samples but it’s worth to make sure that the samples are taken from the ballast tanks and not from the pipelines (it may also be useful to changes ballast **after entering** the Black Sea and maintain the tanks well so that there is no rust/corrosion/suspended solids in there; fresh paint also will add no good to the analyses results).”

We do apologize for this misprint! We hope for your understanding.

Best regards,

Natalia Kalinina

For Igor Cherezov

NOTIFICATION. New Aspects of Ballast Problems in Ukrainian Ports. 14.06.2018

As we are trying to keep our Principals and their Members updated on the subject of ecological authorities activities in Ukrainian ports and related problems, we would like to draw your attention once again to the recent changes, which we are afraid are not for the better.

Following our recommendations for about a year the Owners and the Masters of the ships calling at the Ukrainian ports were able to successfully repel the attacks of the ecological inspectors by not allowing them on board their ships to take samples of segregated ballast and thus, not giving them an opportunity to impose unfair fines. But much to our regret the situation has changed drastically and as we reported in our Notification dd. 05 March 2018 the latest changes in Ukrainian legislation unfortunately returned some rights to the ecological inspectors – they now have a full right to come onboard and take samples of the ballast for further laboratory analysis and take quite an aggressive attitude if obstructed (for the recent fortnight we were notified of a couple of serious conflicts between the Masters, unaware of our latest notification, and the Ecological Inspection resulted in huge fines and penalties).

Therefore, we do recommend in order to avoid undue fines not to hinder the Inspectors and to allow them to take the ballast samples but it's worth to make sure that the samples are taken from the ballast tanks and not from the pipelines (it may also be useful to changes ballast before entering the Black Sea and maintain the tanks well so that there is no rust/corrosion/suspended solids in there; fresh paint also will add no good to the analyses results).

Finally, we would like to emphasize that the best defense against the improper fines is a counter-claim filed after the vessel's departure and there are good chances of winning the case, return the money and restrain the unscrupulous ecological officials in future.

We hope the above will be of help and we remain at your full disposal for any further information/assistance you may require.

Kind regards,

Igor Cherezov