

JAPAN P&I NEWS

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外航組合員各位

ウクライナーバラスト水検査について（注意喚起）（その2）

ウクライナの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.からの続報を入手したので、ご案内します。

ここ数週間の間にもこの問題は多発しており、コレスポンデントは現地弁護士と協議し、推奨されるアクションを以下のとおりアップデートしました。

船長に対する推奨事項

- ウクライナに寄港する際には、バラスト水を黒海進入後に入れ替える
- 環境保護当局検査官の本船乗船を妨げない
- 同検査官によるバラスト水サンプル採取を決して認めない
- （要請があれば）同検査官によるバラスト水排出関連書類閲覧を認める
- 同検査官の調査には必ず本船側の人間が立ち会い、一人にしない
- 過怠金を逃れるための賄賂は渡さない

環境保護当局の検査官は陸上から写真やムービーを撮り、本船の周囲に油などがあると主張し、バラスト水サンプル採取を要求してくることがあります。そのような場合には、速やかに現地コレスポンデントにご連絡ください。また、同時に、PSC オフィサー、チーフオフィサー、P&I サーベイヤーによる共同海面調査を手配することを同検査官にお伝えください。共同海面調査により汚濁の跡が認められた場合には、必ず P&I サーベイヤー立会いのもと、検査官によるバラスト水サンプル採取を認めるようにしてください。

以上

添付資料 : Dias Marine Consulting p.c. Circular dated 15 July, 2018

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NOTIFICATION “Deballasting problem – recommendations to the Masters”. Update 15.07.2018

We suppose many our Principals are already aware of ecological inspectors’ attacks on foreign ships in the Ukrainian ports, but we have to report that for the recent fortnight they have acquired literally massive character. Every day our company receives requests for assistance from the shipowners and P&I Clubs. Having thoroughly analyzed the ecological inspectors’ actions during the latest incidents, as well as having conferred with a number of lawyers on the matter, we have worked out present recommendations which we believe will help to repel the said attacks in a most efficient way.

Recommendations to the Master:

- Make sure that the ballast taken in other parts of the World's Ocean is changed to the Black Sea waters while ship’s passage to one of the Ukrainian ports;
- Do not obstruct the Ecologists’ attendance on board;
- However **never allow** the ecological inspectors’ to take samples of segregated ballast;
- Permit the inspectors to study documentation on deballasting operations (if they ask for this);
- Do make sure that they are not left alone during the inspection and get some ship’s representative to accompany them at all times;
- Do not give bribes in the hope of escaping the fine;

Very often ecological inspectors trying to take ballast samples resort to trickery. They start fussing on the pier where the ship is berthed taking photos and video recording something around the ship and then inform the Master about some oil or dirty spots revealed on the water surface nearby and tell him that they have to take samples of the ship’s ballast to prove that the pollution was not caused by this vessel. Almost any suchlike case is just a “show” aimed at getting access to the ship’s ballast tanks.

In such cases we recommend the following:

- Contact P&I Correspondent immediately;
- Let the ecological inspectors know that a joint survey/visual observation of the sea water area around the ship together with Port State Control officer, Chief Officer and P&I surveyor will be arranged for and assure them that if such joint visual inspection reveal traces of sea pollution they will be allowed to take samples of the ballast from the ships tanks in the presence of a P&I surveyor.

Kind regards,

Igor Cherezov