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Circular Letter No.4510
14 February 2022

To: All IMO Members
Intergovernmental organizations
Non-governmental organizations in consultative status

Subject: **Communication from the Government of Ukraine**

The Government of Ukraine has sent the attached communication, dated 14 February 2022, with the request that it be circulated by the Organization.



Embassy of Ukraine
in the United Kingdom
of Great Britain and Northern Ireland

ANNEX

Circular Letter No.4510
Annex, page 1

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Nr. 6124/23-327/2- 34 - URGENT

The Embassy of Ukraine in the United Kingdom of Great Britain and Northern Ireland presents its compliments to the Secretariat of the International Maritime Organisation and has the honour to inform about the following.

Ukraine wishes to raise its utmost concern about the actions of the Russian Federation, which regularly misuses the promulgation of navigational warnings of military exercises in the maritime areas in the Black Sea and the Sea of Azov, as the pretext for creating obstacles for the international commercial shipping in the region.

Recently, on February 08, 2022 the State Hydrographic Service of Ukraine received from the Department of Navigation and Oceanography of the Ministry of Defense of the Russian Federation the information of planned closures of vast maritime areas in the Black Sea and the Sea of Azov for 6 consecutive days (from 13.02.2022 2100 UTC to 19.02.2022 2100 UTC) because of planned naval and missile firing exercises (see Annex 1 to this Note verbal).

As the result, main recommended routes № 87 and 88 in the Sea of Azov and №№ 44, 60, 81 and 82 in the Black Sea fall under areas announced as dangerous for navigation. Thus, international merchant shipping to / from the ports of Ukrainian ports in the Black Sea and the Sea of Azov could be greatly limited, even amounting to the commercial naval blockade.

Though, given the resolute protest by the Ukrainian Side to the Russian Side regarding such closures of maritime spaces, the Russian Federation cancelled the navigation warning of the conduct of military exercises in the Sea of Azov, significant areas in the Black Sea are still blocked by the Russian actions, as announced in the communication of the NAVAREA District Coordinator III NAVAREA Report 0074/22 (see Annex 2 to this Note verbal).

The Ukrainian Side reiterates that the Russian Federation continued build-up of military pressure jeopardises regional security as well as infringes the safety and security of navigation in the Black Sea, the Sea of Azov and the Kerch Strait in breach of IMO basic conventions.

International Maritime Organization
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Cc: Diplomatic Missions of IMO Member States

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According to the preliminary analysis, recent actions of the Russian Federation in the Black Sea and the Sea of Azov are expected to lead to significant negative consequences for both Ukraine and the international community.

In particular, access to the seaports of Ukraine (Pivdennyi, Kherson, Mykolaiv, Olvia, Skadovsk etc.) is factually impossible for 70% of ships due to insufficient depths of the narrow areas in Black Sea, which remain open and potentially are also endangered by the Russian military exercises held in close distance. It is also predicted that the maritime communication of Ukraine with Georgia and Turkey will be fully interrupted.

In addition, due to the closure of the above-mentioned recommended routes and the necessity to change the routes of ships movement, the distance, travel time and downtime of vessels will be significantly increased. At the same time, the growing concentration of merchant ships in areas, not blocked by Russian military exercises, will meaningfully increase the risk of maritime accidents.

The Ukrainian Side emphasizes that the said actions of the Russian Federation are a clear violation of norms and principles of international maritime law, encompassed in the UN Convention on the Law of the Sea and relevant IMO instruments, relating to the freedom of navigation, pose a direct threat to the international commercial shipping, lead to significant economic losses for both Ukrainian and foreign businesses (shipowners / operators / insurance companies).

The Ukrainian Side requests the IMO Secretariat and Member States to use all available mechanisms to exert pressure on the Russian Federation in order to stop the latter's actions in violation of international maritime law.

The Embassy of Ukraine would appreciate if this Note Verbal is urgently circulated among IMO Member States to all IMO Member States, international organizations which have concluded agreements of cooperation with the IMO and non-governmental organizations in consultative status with the IMO.

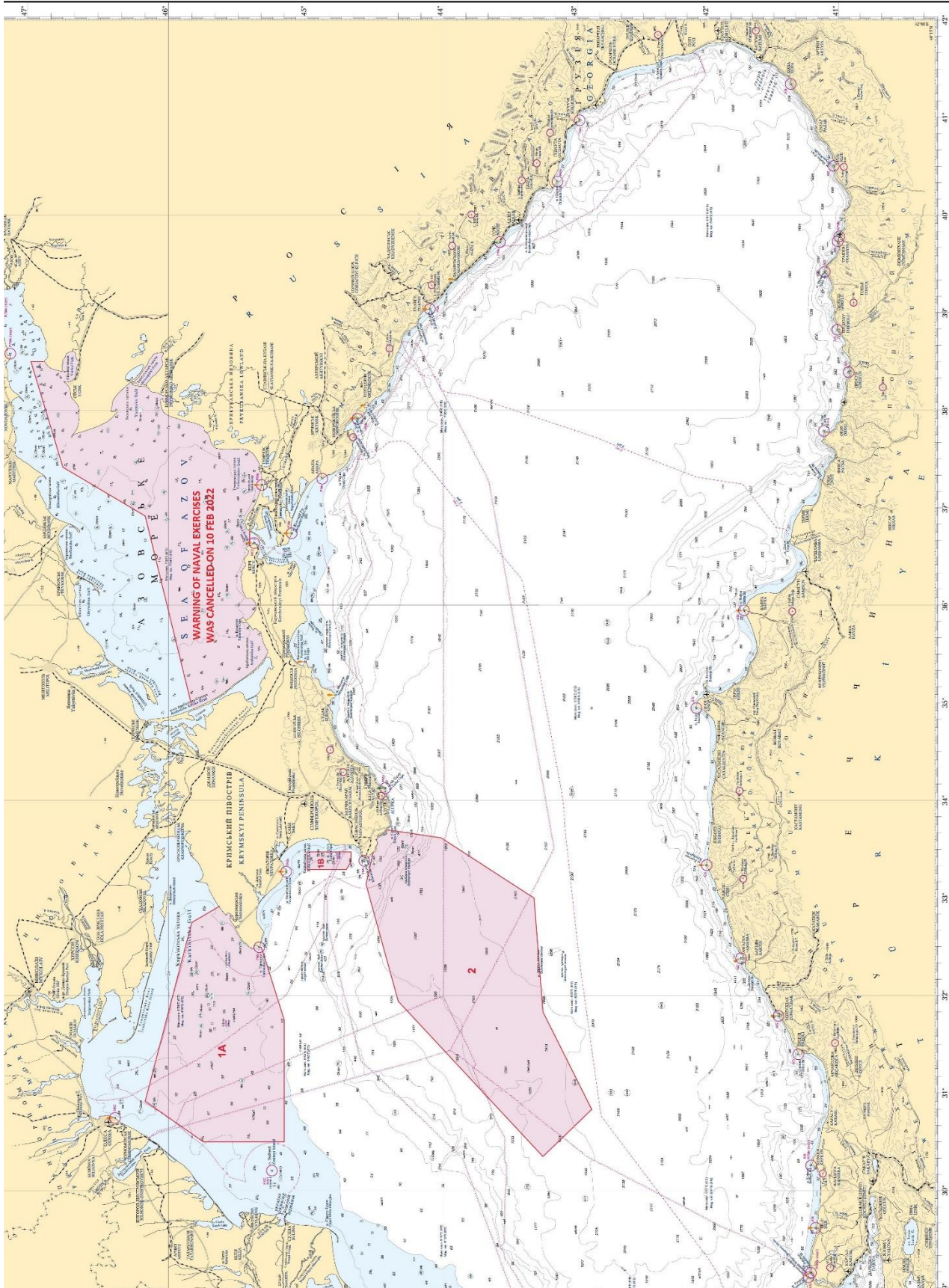
The Embassy of Ukraine to the United Kingdom of Great Britain and Northern Ireland avails itself of this opportunity to renew to the Secretariat of the International Maritime Organisation the assurances of its highest consideration.

Encl.

London, 14 February 2022



Annex 1



Coordinates of the maritime areas where the Russian Federation has announced the conduct of naval and missile firing exercises

NAVAREA III preview 0074/2022

×BLACK SEA

1.-NAVAL TRAINING MISSILE AND GUNNERY FIRING EXERCISES FROM 132100 TO 192100 UTC FEB22 IN AREAS BOUNDED BY:

A.

45-20.0N 032-30.0E

45-10.0N 031-45.0E

45-10.0N 030-30.0E

45-45.0N 030-30.0E

46-10.0N 030-55.0E

45-50.0N 032-45.0E

45-38.0N 032-55.0E AND COASTLINE

B.

45-00.0N 033-17.5E

45-00.0N 033-28.4E

44-40.8N 033-28.4E

44-40.8N 033-22.3E

44-42.9N 033-17.5E

C.

44-25.0N 033-42.0E

44-01.0N 033-37.0E

43-19.5N 033-00.0E

43-15.5N 031-50.0E

42-53.5N 030-50.0E

43-15.5N 030-21.0E

44-20.0N 031-56.5E

44-34.2N 033-08.5E

44-31.0N 033-28.5E AND COASTLINE

D.

45-03.3N 036-17.0E

44-57.5N 036-23.0E

44-45.0N 036-24.0E

44-17.0N 036-24.0E

44-17.0N 035-10.0E

44-47.0N 035-10.0E

45-00.0N 035-50.0E AND COASTLINE

E.

45-07.2N 036-49.0E

44-52.0N 037-04.5E

44-36.5N 037-09.5E

44-15.0N 037-17.5E

42-50.0N 037-42.5E

43-24.0N 036-25.0E

44-31.0N 036-40.0E

44-58.0N 036-36.0E

44-58.7N 036-35.8E
45-06.0N 036-42.0E
45-06.7N 036-44.0E AND COASTLINE

F.

44-34.5N 037-42.0E
44-31.5N 037-50.0E
44-20.5N 037-48.0E
44-24.0N 037-39.5E

G.

44-52.5N 037-11.8E
44-53.4N 037-15.4E
44-44.4N 037-19.4E
44-43.5N 037-15.8E

H.

44-26.0N 037-55.5E
44-06.0N 038-35.5E
43-49.0N 038-18.0E
44-09.0N 037-38.0E

CAUTION ADVISED.

2.-CANCEL THIS MESSAGE 192200 UTC FEB22.
