Republic of the Marshall Islands

MARITIME ADMINISTRATOR

11495 COMMERCE PARK DRIVE, RESTON, VIRGINIA 20191-1506 TELEPHONE: +1-703-620-4880 FAX: +1-703-476-8522 EMAIL: marsec@register-iri.com Website: www.register-iri.com

SHIP SECURITY ADVISORY No. 10-25

To: Owners/Operators, Masters, Company Security Officers, Recognized Security Organizations

Subject: GEOPOLITICAL CONFLICT IN THE BLACK SEA AND SEA OF AZOV

Date: 4 December 2025

This Ship Security Advisory (SSA) supersedes SSA 08-23.

1.0 LATEST DEVELOPMENTS

1.1 Ongoing Conflict and Maritime Threats

- .1 Russia and Ukraine continue to execute military operations, suggesting military and drone attacks on Ukrainian and Russian infrastructure will continue, particularly against energy-related targets as well as maritime vessels and ports. Maritime entities remain at risk of direct targeting, collateral damage, and Global Navigation Satellite System (GNSS) interference.
- .2 Ukrainian forces have conducted repeated strikes on Russian energy infrastructure, including a second attack on the Tuapse oil terminal and a combined Unmanned Aerial Vehicle (UAV) / Unmanned Surface Vessel (USV) operation on 3 November 2025 against a Russian-occupied offshore drilling rig in the Black Sea.
- .3 Ukraine's temporary maritime corridor remains in use but carries significant risk, including potential harassment, collateral damage from strikes, and hybrid threats such as GNSS interference.
- .4 The European Union's Black Sea Maritime Security Hub, launched in May 2025, enhances regional monitoring of critical infrastructure like submarine cables and offshore installations to counter Russian hybrid activities, including sabotage.

1.2 Floating Mines

SSA-MARSEC

.1 Over 100 sea mines have been identified since 2022. Mine countermeasure operations by Romania, Bulgaria, Turkey, and Ukraine continue amid counterclockwise currents that drift devices toward western shores, posing risks to merchant traffic.

This SSA is evaluated annually by the RMI Maritime Administrator (the "Administrator") and expires one year after its issuance or renewal unless otherwise noted, superseded, or revoked.

- .2 <u>NAVAREA III</u> warnings 0092 and 0122 remain in force for mined areas and drifting mines.
- .3 Vessels approaching Romanian ports are advised to use position 43°47.59' N, 028°50.86' E. Contact Bulgarian authorities for recommended tracks for Mangalia, Constanta, and Sulina. Maintain lookouts and report detections via VHF Channel 16 to Romanian authorities.

1.3 UAV and USV Threats

- .1 Ukrainian UAV/USV operations continue against Russian energy and naval/maritime infrastructure, including the 3 November 2025 rig strike, demonstrating "stacked" unmanned systems for surveillance, delivery, and loitering munition attacks beyond shorelines.
- .2 Increased Russian and Ukrainian drone activity has been observed over the Black Sea, with commercial vessels visible near attack trajectories, heightening collision or misidentification risks. Heightened vigilance for drone activity is strongly advised.

1.4 Caspian Pipeline Consortium (CPC) and Russian Black Sea Ports

- .1 Ukrainian attacks on Tuapse and earlier strikes on Novorossiysk continue to disrupt Russian energy infrastructure and highlight persistent vulnerability of CPC-related facilities and Black Sea oil terminals.
- .2 Russian ports face hybrid threats, including potential sabotage of undersea cables, gas platforms, and commercial vessels via the use of limpet mines or unmanned underwater vehicles (UUVs).

1.5 Recent Incidents at Port

- .1 Collateral damage during port infrastructure attacks remains a primary risk to merchant vessels. Recent incidents include:
 - a) 14 November 2025 Novorossiysk (Russia): Ukrainian forces launched a combined drone and missile attack on the port, damaging an oil depot, cargo terminal, and a docked ship. Three crew members were injured and oil exports temporarily halted (approx. 2% of global supply affected).
 - b) 15 November 2025 Odesa region and Kyiv (Ukraine): Russian overnight air assault with missiles and drones damaged energy infrastructure and port facilities.

- c) 17 November 2025 Izmail (Ukraine, Danube River): Russian drones deliberately struck a Turkish-flagged LNG tanker carrying 3,000 tons of liquefied petroleum gas, igniting a major fire. One injury was reported and evacuations were ordered in nearby Romanian villages. Multiple merchant vessels sustained damage. The intention of the attack is suspected to be deterrence of Turkish shipowners from trading in Ukraine.
- d) 17 November 2025 (Tuapse, Russia): Ukrainian USVs attacked the Tuapse oil terminal, causing explosions near a loading pier with one tanker present. Oil spill reported; fuel exports suspended and refinery shut down.
- .2 Four merchant vessels were previously damaged by Russian missile strikes in Ukrainian ports in 2025:
 - a) 1 March 2025 A Panama-flagged container ship and a Sierra Leone-flagged bulk carrier were damaged in Odesa; no crew casualties.
 - b) 11 March 2025 A Barbados-flagged bulk carrier was hit in Odesa; four crew killed, two injured.
 - c) 31 August 2025 A Belize-flagged bulk carrier sustained minor damage from an explosive device near Chornomorsk; no casualties.

1.6 Recent Incidents at Sea

- On 7 October 2025, a bulk carrier with intentions of calling in Russia, was struck by a UAV in the middle of the Black Sea, approximately 72nm north of Sinop, Türkiye. As the UAV was not carrying a payload, no serious damage or injuries were reported. It is not clear who was responsible for the incident as it could have been a targeted attack, a case of mistaken identity, or accidental.
- .2 On 29 November 2025, two tankers were struck by USVs carrying explosives in the Black Sea. Both vessels have an extensive history of carrying oil from Russia's Black Sea ports. Ukraine has taken responsibility for the USV attacks.
- .3 On 2 December 2025, a Russian-flagged tanker carrying sunflower oil was attacked by a UAV 80nm off the Turkish coast. No casualties were reported. Ukraine did not claim responsibility for the attack.

1.7 Additional Threats to Commercial Vessels

.1 Sanctions

a) Russia's sanction-evading tankers may increase collision and pollution hazards through unsafe operations, including near Ukrainian grain corridors.

- .2 Hybrid and Cyber Threats
 - a) Potential sabotage of submarine cables.
 - b) GNSS interference.

2.0 SECURITY LEVELS

- .1 Ukraine exclusive economic zone (EEZ): The Administrator requires **SECURITY LEVEL III** (or equivalent security measures at port) for all RMI-registered vessels.
- .2 Russia Black Sea EEZ: **SECURITY LEVEL II** (or equivalent measures at ports) is required.
- .3 Vessels calling at Russian or Ukrainian ports in the Black Sea must implement security measures equivalent to the declared level and complete a Declaration of Security with the Port Facility Security Officer (PFSO) whenever possible.

3.0 TARGETED VESSELS AND SEAFARERS

- .1 Vessels with Ukrainian crew may face additional scrutiny or interrogation in Russian ports.
- .2 Russia's export restrictions and evolving sanctions increase the risk of detention or harassment for vessels linked to Western states or carrying restricted cargoes. Operators should verify cargo compliance with local agents prior to fixing.
- .3 Seafarers aboard stranded or transiting vessels face heightened risks from attacks, supply shortages, and psychological strain.

4.0 GUIDANCE

- .1 If possible, avoid transits and operations within the EEZs of Ukraine and Russia in the Black Sea. The Kerch Strait remains blocked, and Sea of Azov access requires Russian consent.
- .2 Vessels alongside at closed Ukrainian ports must remain until granted military permission to depart.
- .3 Ukrainian ports are closed except for individually cleared vessels via the special corridor.
- .4 Transit of the northwest Black Sea is not advisable due to restrictions and mine threats.

- .5 Maintain AIS transmission in accordance with SOLAS unless the master deems that its operation compromises safety or security.
- .6 Monitor VHF at all times for warnings.
- .7 Prepare for GNSS interference (reference SSA <u>09-25</u>).
- .8 Comply with instructions from military vessels; report hails immediately.
- .9 Always conduct dynamic pre-voyage threat and risk assessments.
- .10 Designate a safe muster point (SMP) for use during UAV/USV attacks. The SMP should be located above the waterline, amidship, and low-down in the superstructure.
- .11 Post watchkeepers at the bow of vessels and minimize sailing during low visibility conditions.
- .12 Enhance watchkeeping and drills to address USV, UAV, and underwater threats.
- .13 Implement strict crew-movement controls during elevated threat periods to reduce exposure.
- .14 Consider requesting hull inspections on vessels that have recently called Russian ports.

5.0 INTERNATIONAL MARITIME ORGANIZATION (IMO)

.1 The IMO maintains an Emergency Task Force and dedicated <u>webpage</u> with guidance and updates, emphasizing the paramount importance of seafarer safety, international shipping security, and Ukraine's special maritime corridor for commercial vessels departing Chornomorsk, Odesa, and Pivdennyi. <u>Resolution A.1183(33)</u> underscores technical assistance for Ukraine's corridor operations.

6.0 RESOURCES

- .1 NAVAREA III Warnings in Force
- .2 NATO Shipping Centre <u>Risk of Collateral Damage in the Northwestern, Western,</u> and Southwest Black Sea
- .3 NATO <u>ATP2</u>: NCAGS' Guide to Owners, Operators, Chapter 4
- .4 OCIMF: *Loitering Munitions The Threat to Merchant Ships*

- .5 US Maritime Advisory <u>2025-011</u>: *Black Sea and Sea of Azov Military Combat Operations*
- .6 IMO: Maritime Security in the Black Sea and Sea of Azov

7.0 REPORTING

- .1 Immediately report any incident or suspicious activity to the Administrator and NATO Shipping Centre (NSC).
- .2 Report suspected cyber or electronic interference to the Administrator (MI-109-5) and NSC.

8.0 CONTACT INFORMATION

- .1 Refer to Global Maritime Security Contacts (MARSEC-210).
- .2 Direct any questions or concerns to marsec@register-iri.com.