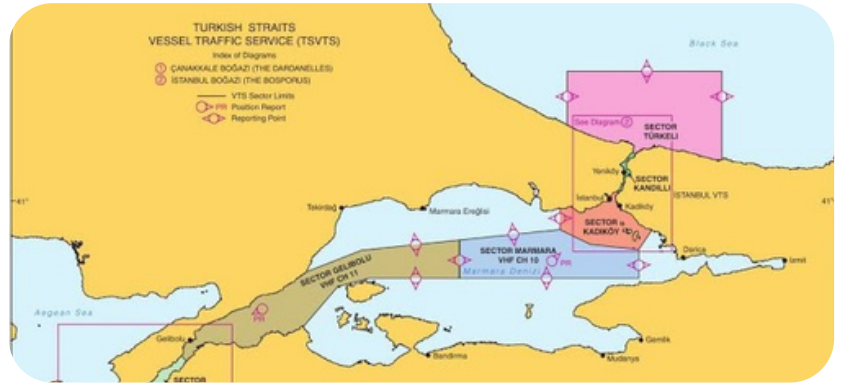




by Türk P&I Sigorta A.Ş.

TURKISH STRAITS MARITIME TRAFFIC REGULATION IMPLEMENTATION DIRECTIVE

With the Ministerial Approval dated 23.12.2024 and numbered 2396435, amendments have been made to the legislative provisions with the approval of the *Directive on the Implementation of the Turkish Straits Maritime Traffic Regulations*. These amendments will come into effect as of February 1, 2025. (p.2)



HOUTHİ ANNOUNCEMENT REDUCES THREAT TO COMMERCIAL SHIPPING

Yemen's Houthi movement has announced that its attacks on commercial vessels will be limited solely to vessels linked to Israel. This statement is conditional on the full implementation of the Gaza ceasefire agreement. The Humanitarian Operations Coordination Center (HOCC), stated that the Houthis would temporarily lift their "sanctions" on commercial vessels. (p.3)

TURKISH STRAITS MARITIME TRAFFIC REGULATION IMPLEMENTATION DIRECTIVE



The Turkish Straits Maritime Traffic Regulation Implementation Directive, approved with the Ministry's decision dated 23.12.2024 and numbered 2396435, has introduced some changes to the existing legal provisions.

Key changes made with the directive include:

- Before a vessel transits the strait, if the pilot notices that the pilot ladder is not properly installed in accordance with the regulations, they will report the non-compliance to the port authority with video and photographic evidence and the Strait passage will be canceled. The vessel can be included back in the strait passage planning after it has properly prepared the pilot ladder and informed the port authority and the Vessel Traffic Services (VTS) Center.
- The agents of the vessels owned by companies engaged in submarine water services and port construction, such as driving barges, crane barges, and hopper barges, towed by Turkish flagged tugboats with total tow length up to 90 meters, will apply to the relevant regional port authority to request the establishment of the required transit conditions. If the passage will be through both straits, the application will be made only to the Istanbul Regional Port Authority. Towage with notification will be conducted considering meteorological conditions, with a minimum speed of 4 knots over ground within the strait, and will take place during daylight hours.
- The additional escort tugboat or tug power requirement for dual-fuel vessels capable of using LNG and other fuels has been abolished.
- For passenger ships entering the Dardanelles Strait, and ships over 250 meters in length, ships over 200 meters in length carrying IMDG Code Class 1 cargo, and all vessels being towed, it is recommended that these ships transit with a tugboat escort. Ships over 200 meters in length, except for the above, are advised to transit with a pilot.
- Vessels arriving in laden condition to Turkey's strategically important oil refineries, LNG/LPG terminals, or energy plants and vessels requesting repairs, maintenance with written agreement from shipyards, may be granted priority for strait passage based on applications from the terminals or shipyards. These applications should be submitted to the authorities at least 48 hours before the vessel's Strait passage.
- Ships that experience a malfunction in the Sea of Marmara and intend to transit the Straits after repairs will undergo a survey by the class society or the regional port authority of the strait they will be passing through.

The changes will come into effect on February 1, 2025.



HOUTHİ ANNOUNCEMENT REDUCES THREAT TO COMMERCIAL SHIPPING

In a significant development for maritime security, Yemen's Houthis have declared a temporary reduction in attacks on commercial vessels, focusing their efforts exclusively on Israeli-linked ships. This shift is contingent upon the full implementation of the Gaza ceasefire, as outlined by the Humanitarian Operations Coordination Center (HOCC), which maintains communications between Houthi forces and the shipping industry.

On the 19th of January, the Houthi-aligned Humanitarian Operations Coordination Center (HOCC) issued an email to stakeholders in the shipping industry announcing that the Houthi would cease military operations against merchant shipping in line with the Israel-Hamas ceasefire.



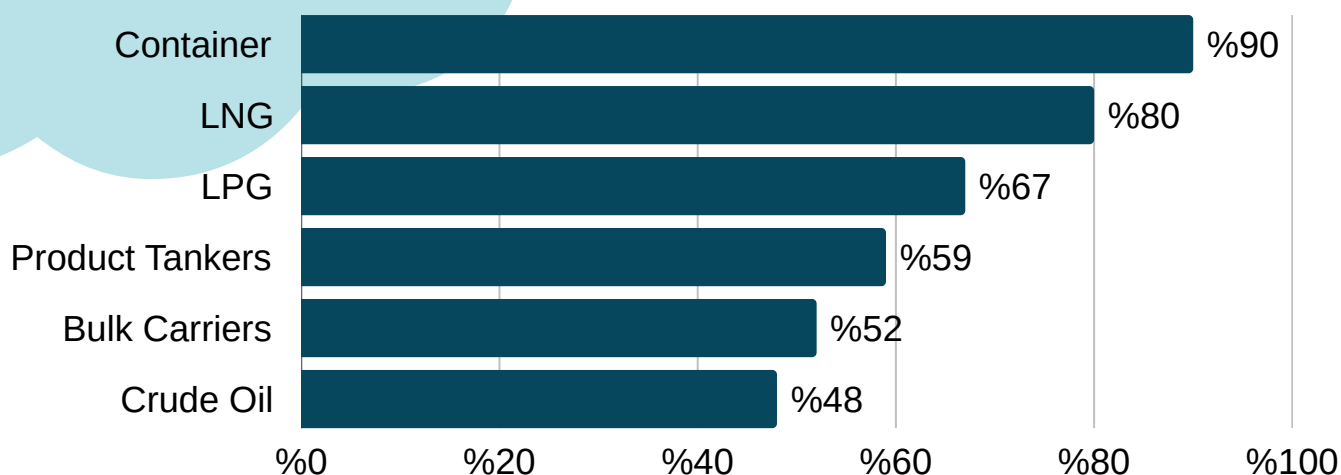
Israel owned or flagged vessel were explicitly exempted from this cessation of hostilities.

The HOCC's statement further clarifies that attacks on Israeli-linked vessels will cease "upon the full implementation of all phases of the ceasefire agreement." Phase 1 of the ceasefire, effective from January 19, 2025, spans 42 days, and Phase 2 is expected to be negotiated within the first five weeks. The situation remains fluid, with the risk of hostilities reigniting if either side perceives a breach of terms.

While the reduction in threats to commercial shipping is welcome news for the maritime industry, Israeli-owned and flagged vessels remain at heightened risk during this fragile ceasefire period. The situation's stability hinges on the successful implementation of the ceasefire agreement, which is still subject to ongoing negotiations.

Given the volatility of the region, maritime stakeholders are advised to stay vigilant. The potential for rapid escalation remains high, particularly if either party interprets actions as violations. Shipowners and charterers should continue to closely monitor developments and perform risk assessments when considering transits through affected areas.

- Due to the influence of the Houthis in the region, the latest data from Jefferies investment bank indicates a 56% decrease in the number of ships passing through the Suez Canal compared to 2023. The decline rates by ship types are listed below.



- These data reveal a significant contraction in the Suez Canal, a crucial link in global trade.
- According to S&P Global's analysis, the re-emergence of alternative routes over the Red Sea could bring new dynamism to the maritime shipping industry. It is projected that the activation of these routes could restore an increase equivalent to 6% to 8% of the current fleet's capacity to container shipping.
- A 24% increase in container shipping capacity is expected over the next three years. This growth expectation is associated with the recovery in the sector and the implementation of alternative logistics solutions. However, this significant decline in the Suez Canal is also likely to cause some fluctuations in global logistics chains.



EXPANSION OF P&I INSURANCE OBLIGATIONS IN TURKISH MARITIME JURISDICTION

For Turkish-flagged vessels over 300 GT, having P&I (Protection and Indemnity) insurance is mandatory, and this must be obtained from one of the reputable insurance organizations approved by the Directorate General of Maritime Affairs. Now, this regulation is being expanded to a broader scope. Regardless of their flag, all vessels of 300 GT and above entering or departing from port facilities within Turkish maritime jurisdiction are required to carry insurance against maritime claims.

According to a new directive dated January 9, 2025, all vessels of 300 GT and above, whether Turkish-flagged or foreign-flagged, are now required to obtain P&I insurance from reputable insurance organizations registered with the Port Management Information System (LYBS). This measure aims to ensure stricter control and enhance safety in Turkish ports. Vessels holding P&I policies from insurance companies not registered with LYBS by February 20, 2025, will not be permitted to access Turkish ports.

The new regulation provides a clear list of reputable P&I organizations registered with LYBS. The insurance companies included in this list are automatically considered approved. However, companies not listed will need to undergo an approval process. This makes it even more critical for shipowners and operators to carefully choose their insurance providers.



ENCLOSED SPACES ON BOARD

Every year, a significant number of maritime industry personnel suffer serious injuries or fatalities while working in or entering enclosed spaces. The primary causes of such incidents include insufficient training on enclosed space safety, improper or inadequate implementation of procedures, and unawareness of atmospheric hazards that are not visible to the naked eye.

According to international standards, an enclosed space is defined as a space with at least one of the following characteristics;

- **Limited Openings for Entry and Exit:** Enclosed spaces typically have narrow or restricted access points, making entry and exit challenging.
- **Inadequate Natural Ventilation:** These spaces often lack sufficient airflow, preventing the natural renewal of the atmosphere and potentially leading to oxygen deficiency or the accumulation of harmful gases.
- **Not Designed for Continuous Worker Occupancy:** Enclosed spaces are usually intended for temporary access, such as maintenance, repair, or inspection, rather than continuous human occupancy.

The most significant hazard in enclosed spaces arises from the atmospheric conditions within these spaces, which can pose severe risks to human health and safety. Before entering an enclosed space, the following atmospheric parameters must be carefully monitored and controlled;

1. **Oxygen Level:** The oxygen concentration should be sufficient for human survival, ideally at 20.9%. Oxygen deficiency may result from chemical reactions or biological processes, leading to asphyxiation.
2. **Flammable Gas Level:** The concentration of flammable gases (e.g., hydrocarbons) must remain below the lower explosive limit (LEL) to mitigate explosion risks.
3. **Toxic Gas Level:** The presence of harmful gases, such as hydrogen sulfide (H₂S) or carbon monoxide (CO), must be measured and confirmed to be within acceptable limits.



PRECAUTIONS TO BE TAKEN

- **Ventilation:** Enclosed spaces should be ventilated before entry using natural or mechanical methods (e.g., air blowers). This process removes harmful gases and ensures safe oxygen levels. Continuous ventilation may be required during operations.
- **Entry Permit and Risk Assessment:** Obtain an entry permit (Work to Permit) and conduct a detailed risk assessment to identify hazards, necessary controls, and the scope of the work. All equipment and procedures should be reviewed for safety.
- **Energy Isolation (Lockout-Tagout):** Isolate and lock out all energy sources (e.g., machinery, pipelines) that could impact the enclosed space. Verify that isolation is complete, paying attention to environmental factors like pressure changes or leaks.
- **Standby Personnel:** A standby person must remain outside the space, maintaining constant communication with those inside and alerting rescue teams in emergencies.
- **Fire Prevention:** If hot work (e.g., welding) is to be performed, all flammable materials should be removed from the area, and appropriate fire-fighting equipment must be readily available. A hot work permit should be obtained, and all safety measures must be implemented prior to starting the work.
- **Atmosphere Testing and Monitoring:** The atmosphere within the enclosed space must be tested prior to entry and continuously monitored throughout the operation. The testing should include key parameters such as oxygen levels, flammable gas concentrations, and toxic gas presence. It is crucial to ensure that gas detectors used for this purpose are properly calibrated and functional. Since atmospheric conditions may change during operations, periodic re-testing is mandatory to ensure continued safety.
- **Personal Protective Equipment (PPE):** Crew must wear appropriate PPE, including breathing apparatus, safety harnesses, and protective clothing suited to the task.
- **Emergency and Rescue Plan:** A comprehensive emergency response and rescue plan must be established before commencing work. Adequate rescue equipment, such as retrieval systems and breathing apparatus, must be prepared and readily available. All crew involved in the operation should be trained in the emergency procedures outlined in the plan.



In maritime terminology, a “wake” is the trail of water left behind by a moving vessel. This trail indicates the path the vessel has taken and continues for a while after the vessel has passed. The size and intensity of a wake can indicate the vessel’s size and speed.

The phrase ‘in its wake’ is used to describe the effects or events that follow a significant incident or action. Much like the trail left behind by a vessel, this phrase emphasizes the changes and impacts that follow an event.