



by Türk P&I Sigorta A.Ş.

EU CRACKS DOWN ON “DARK FLEET” WITH NEW MARITIME INSURANCE RULES

The European Commission has amended the Ship Monitoring Directive to enhance maritime safety by requiring all vessels transiting EU territorial waters — regardless of port calls — to provide valid insurance information. This measure aims to strengthen oversight of the so-called “dark fleet,” which poses environmental risks, and to identify uninsured vessels. NATO and EU member states are supporting the effort through AIS tracking, artificial intelligence analysis, and Port State Control inspections. (Pg.3)



KEY CHANGES IN THE MLC

Ahead of the 20th anniversary of the Maritime Labour Convention (MLC), shipowners, governments, and workers' unions have reached an agreement on a set of significant updates to the global treaty that sets minimum working and living standards for seafarers. The changes were adopted during the latest meeting of the Special Tripartite Committee (STC), held in Geneva under the auspices of the International Labour Organization (ILO).

The updated provisions are expected to enter into force in December 2027, following formal adoption at the 113th International Labour Conference in June 2025.

Adopted in 2006 by consolidating 37 existing ILO instruments, the MLC is widely regarded as the "seafarers' bill of rights." In light of challenges faced during the COVID-19 pandemic including prolonged onboard service, crew change restrictions, and denied shore leave the need for revisions became pressing.



The discussions were led by the International Chamber of Shipping (ICS) on behalf of shipowners, and the International Transport Workers' Federation (ITF) representing seafarers, with governments also participating as equal partners in the tripartite structure.

Tim Springett, Chair of the ICS Labour Affairs Committee and Spokesperson of the Employers' Group at the ILO, stated:

"Together with governments and our social partners, we've secured substantial improvements to the rights of seafarers. These amendments demonstrate that no matter the challenges we face as an industry, collaboration leads to meaningful solutions."

Key Amendments Introduced

- Official recognition of seafarers as "key workers" at the international level.
- Stronger provisions on repatriation, ensuring clarity and enforcement of the right to return home at the end of contracts.
- Simplified shore leave access, eliminating visa or special permit requirements in most cases.
- Enhanced protections against bullying and harassment onboard, with clarified responsibilities for employers and shipmasters.
- Mandatory carriage of the ICS International Medical Guide for Seafarers and Fishers, to support onboard medical care. The guide, released in March 2023, was developed jointly by ICS, ITF, and IMHA.

EU CRACKS DOWN ON “DARK FLEET” WITH NEW MARITIME INSURANCE RULES

The European Commission has introduced a significant amendment to the Ship Monitoring Directive, targeting so-called “dark fleet” vessels that operate under opaque ownership, lack proper insurance, or circumvent sanctions. From now on, all ships transiting EU territorial waters—regardless of port calls—will be required to provide valid insurance documentation. This move is designed to strengthen maritime oversight, ensure environmental safety, and protect undersea infrastructure from poorly maintained or unidentified vessels.

Magda Kopczyńska, Director-General for Mobility and Transport at the European Commission, stated:

“This is a targeted but potentially high-impact measure. It increases the preparedness of EU coastal states.”

The Commission highlighted that by mandating insurance information from all vessels operating within its waters, it is enhancing its ability to monitor, inspect, and if necessary, detain non-compliant ships that may pose environmental or navigational threats.

Behind the Decision?

According to S&P Global Market Intelligence, over 1,000 ships were sanctioned last year, and for around 800 of them, valid insurance could not be verified. The average age of these vessels was 21 years, significantly older than the global average of 13, raising concerns about their seaworthiness and environmental risk. Past incidents have included damaged undersea cables, AIS deactivation, and near-misses with sensitive infrastructure prompting coordinated responses across the EU and NATO.

The EU’s latest initiative complements ongoing regional efforts,

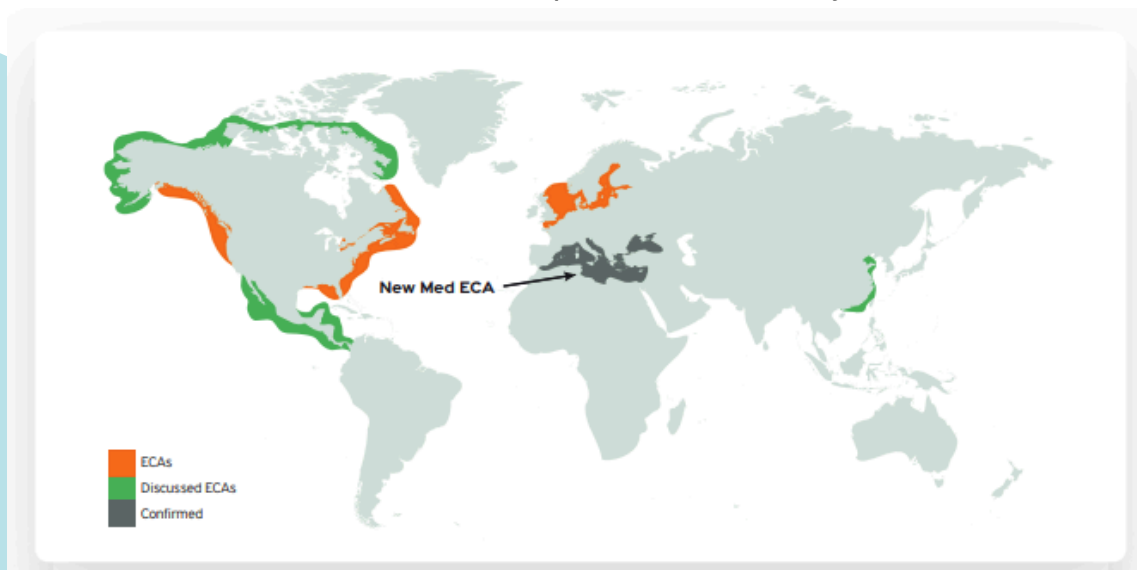
- **“Baltic Sentry”**, led by NATO and Baltic states since January, focuses on maritime domain awareness.
- **“Nordic Warden”**, a UK-led operation, uses AI and AIS data to monitor suspicious vessel movements and assess threat levels.
- **Denmark’s Maritime Authority** has begun inspecting high-risk tankers anchoring near Skagen.
- **Estonia** recently detained a 18-year-old tanker suspected of sailing under a false flag—marking a first for Baltic state enforcement.

With this regulatory update, the EU is sending a clear signal that maritime safety, environmental protection, and critical infrastructure security are non-negotiable. The “dark fleet” can no longer operate freely under the radar in European waters.

“MEDITERRANEAN ECA 2025” IN EFFECT

As of 1 May 2025, the Mediterranean Sea has officially been designated as the world's fifth Sulphur Oxide Emission Control Area (SOx ECA), following the Baltic Sea, North Sea, North America, and the Caribbean. Under this regulation, the sulphur content in marine fuels used by all ships operating in the region is now limited to 0.10%. This measure, implemented under **MARPOL Annex VI**, aims to improve air quality, protect human health, and reduce environmental impact throughout the Mediterranean region. The decision was formally approved by the IMO in 2022, following a joint proposal by the 21 Mediterranean coastal states and the European Union within the framework of the **Barcelona Convention**. The implementation is coordinated by **REMPEC** (*the Regional Marine Pollution Emergency Response Centre for the Mediterranean Sea*). Under the new rules, ships must either use fuel with a sulphur content not exceeding 0.10% or comply by using approved equivalent exhaust gas cleaning systems (*scrubbers*).

The regulation is expected to bring significant environmental and health benefits. According to IMO and REMPEC estimates, SOx emissions are expected to be reduced by 78%, and PM2.5 emissions by 23.7%. It is also estimated that approximately 1,100 premature deaths and 2,300 cases of childhood asthma will be prevented annually.



This development also has economic implications. Operators such as Ocean Network Express (ONE) have introduced an **ECA surcharge of USD 17 per TEU** for all import and export shipments transiting the Mediterranean. Increased fuel costs are particularly expected on short-sea and ECA-dense routes.

Compliance with the regulation will be monitored through **Port State Control (PSC)** inspections. Non-compliant vessels may face penalties or be denied entry into EU ports. Looking ahead, the European Commission and Mediterranean countries are working on additional measures to limit nitrogen oxide (NOx) emissions. Another emission control area, the Northeast Atlantic ECA, is also planned to enter into force in 2027.

EXTERNAL AUDIT REPORT

Under the **International Safety Management (ISM)** Code, each ship and its operator are required to establish a written **Safety Management System (SMS)** and demonstrate its effectiveness through periodic audits. Within this framework, the **external audit** is not merely a certificate renewal process, it is also a critical tool that reflects the vessel's safety culture and organizational risk awareness. External audits within the scope of the SMS are conducted either by the vessel's **Flag State Authority** or by a recognized **classification society authorized by that state** (e.g., DNV, Lloyd's Register, Bureau Veritas, Türk Loydu).

These audits follow a five-year cycle and include, Initial Certification Audit, Intermediate Audit, Renewal Audit. Upon successful completion of the audit, the operating company is issued a DOC, while the vessel is granted a SMC.

These reports verify whether the SMS is not just a document, but a system that is effectively implemented in operations, by assessing;

- Integration of safety principles into day-to-day operational processes,
- Crew readiness for emergencies, familiarity with safety equipment, and procedural awareness,
- Compliance with international regulations (e.g., SOLAS, MARPOL, MLC 2006),
- And most importantly, the adoption of a proactive risk management approach.

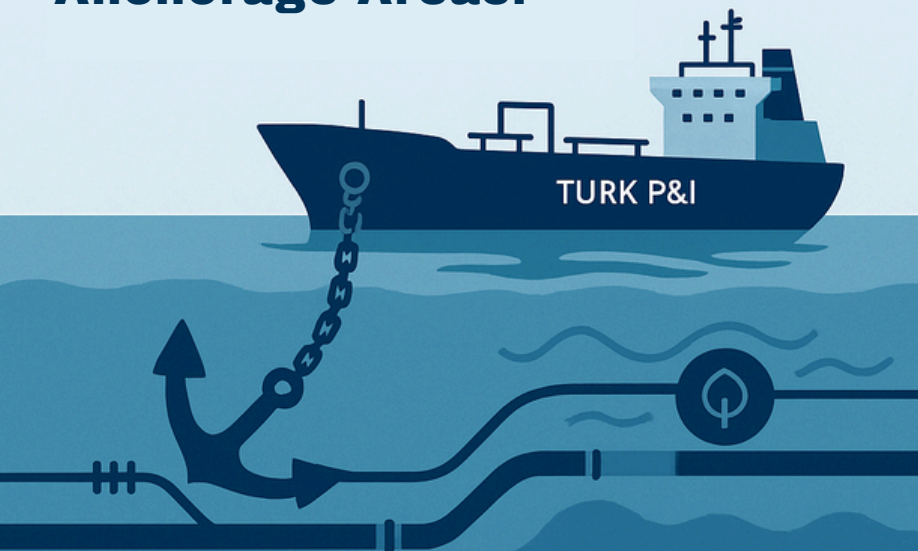
EXTERNAL AUDIT FOR SAFETY MANAGEMENT SYSTEMS



Through external audits;

- Weak links in the company or vessel's safety awareness are identified,
- Crew training and certification status are assessed,
- Operational deficiencies that could lead to incidents are detected before they escalate,
- Therefore, external audit reports become essential tools in developing preventive safety strategies and managing a vessel's insurance risk profile effectively.

Anchor with Caution: Do Not Exceed Designated Anchorage Areas!



- 📌 Vessels must anchor only within officially designated anchorage areas and must not exceed these limits.
- ⚓ Masters are responsible for taking the necessary precautions in areas where anchor dragging risk is present.
- 📄 Administrative sanctions may be imposed on vessels anchoring outside the authorized zones.
- 🚢 If deemed necessary, the Port Authority may assign an escort tug to the vessel.
- 🔍 For hazardous cases, underwater inspections and related costs will be borne by the vessel owner.

The **Ministry of Transport and Infrastructure** has issued a warning to maritime stakeholders regarding risky anchoring practices observed in the **Southern Entrance of the Istanbul Strait and Ambarlı Port Authority anchorage areas**.

According to the latest official notice, anchoring outside the designated anchorage zones poses a serious threat to critical underwater infrastructure.

Authorities emphasized that **submarine natural gas and oil pipelines**, as well as communication cables, are at significant risk of damage due to improper anchoring practices. To mitigate these risks, new preventive measures have been announced.



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.