



## OPERATIONAL NOTICE

### No. 7 of 2022

## Russia Sanctions – Ship Agent Requirements

*(Circulated to Belfast Harbour Ship Agents only)*

1. On 1 March 2022, the UK Secretary of State for Transport made the Russia (Sanctions) (EU Exit) (Amendment) (No. 4) Regulations 2022 to implement maritime sanctions against Russia. The 2022 Regulations came into force on the same day, and they amend the Russia (Sanctions) (EU Exit) Regulations 2019 (**the Amended 2019 Regulations**).
2. Under Regulation 57A (Prohibition on port entry) of the Amended 2019 Regulations, Belfast Harbour Commissioners must not cause or permit a ship to enter Belfast Harbour where a ship has 'links to Russia'.<sup>1</sup>
3. Belfast Harbour Commissioners are taking steps to ensure that the Amended 2019 Regulations are complied with in Belfast Harbour and it is Belfast Harbour Commissioners view that ship agents have a crucial role to play in upholding the relevant UK Government sanctions against Russia. Should a ship agent have reasonable cause to suspect a vessel may be in breach of these sanctions, or they become aware of a change to the vessel's status, e.g. change of owner, flag, classification society, etc., they are required to notify the port as soon as possible.
4. As a consequence of the intermediary role that ship agents play between Belfast Harbour Commissioners and ships, ship agents have access to key information that will assist with ensuring that the Amended 2019 Regulations are complied with. Belfast Harbour can assist ship agents with compliance checking in advance of booking on a case by case basis, noting that any information shared by the port is provided without guarantee of port entry and does not relieve a ship's agent from their own requirements under the Regulations.
5. Prior to any ship entering Belfast Harbour, Belfast Harbour Commissioners may request ship agents to clarify the following points, and provide relevant evidence:
  - a. that the ship is not owned, controlled, chartered or operated by a designated person;
  - b. that the ship is not owned, controlled, chartered or operated by persons connected with Russia;
  - c. that the ship does not fly the flag of Russia
  - d. that the ship is not registered in Russia; and

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<sup>1</sup> Note that reference to 'links to Russia' in this document is a short-hand expression for whether Regulation 57A(5) of the Amended 2019 Regulations is applicable

- e. that the ship is not a ship specified by the Secretary of State.
6. The responses (and relevant evidence provided) will be considered and Belfast Harbour Commissioners in parallel will also undertake due diligence on all ships seeking to enter Belfast Harbour. It may be that ship agents are asked to clarify information provided or other information that Belfast Harbour Commissioners are aware of.
7. Belfast Harbour Commissioners will come to a view on whether it is known or whether there is reasonable cause to suspect that a ship has links to Russia. If so, the relevant ship's entry to Belfast Harbour will be prohibited. If not, Belfast Harbour Commissioners will comply with the open port duty and permit the relevant ship to enter Belfast Harbour.

The effect on ships entering Belfast Harbour from any future related legislation or guidance published by the UK Government will be considered and responded to as appropriate. Belfast Harbour Commissioners reserve the right to vary the process outlined above at any time. If the UK sanctions regime is extended to other nations, the above confirmations will be required in respect of those nations.

The latest Department for Transport Guidance (Version 3) is circulated with this notice for information.

PORT OPERATIONS  
BELFAST  
18<sup>th</sup> MARCH 2022



CAPTAIN K. G. ALLEN  
HARBOUR MASTER