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### DEDER – (MARITIME SAFETY ASSOCIATION)

The declaration of Deniz Emniyet Dernegi, (Maritime Safety Association):

*“We are welcoming the new safety measures with pleasure”*

*“The tug escort service to tankers should be decreased to tankers in 150 meters of length”*

*“Tethered tug escort and stationery patrolling tugs along Strait should be considered”*

The explanatory instructions attached to Turkish Straits Maritime Traffic Regulation has been reviewed by the Ministry of Transport and Infrastructure and while some of the measures for improving the safety of navigation at Turkish Straits has been amended, there are also some new measures that have been introduced. We, as Deniz Emniyet Dernegi (Maritime Safety Association) would like to point out what these new/amended regulations have brought with themselves briefly as follows;

- 1- Whilst it was previously compulsory for tankers in 250 meters of length + to use pilot and tugboat, now this is also compulsory for the tankers in 200 meters in meters or more. Assuming that almost all of such tankers used to use pilots, this new measure is about to be applied to approximately 1250 additional tankers annually which will have to use escort tugs for their passages. Briefly speaking, new measures will mean that approximately 4 tankers per day will be escorted by tugs as a plus.
- 2- The tankers from 250 to 300 meters of length, totalling approximately 700 passages per year, were already using pilot and tugboat, therefore, for this size group, there will be no change. In other words, approximately 2 tankers a day were receiving tugboat assistance and this will continue.
- 3- As a new measure, the LPG tankers from 150 meters to 200 meters in length,, will have to use pilot and and tug escort. This new measure implies that 160 LPG tankers will be escorted by tugs annually which did not use this service before. As these vessels were also already receiving pilot, then there is no change in this respect.
- 4- Likewise, the LPG tankers of 200 meters plus were already receiving pilot and tug assistance, therefore, there will be no change for these vessels either. Approximate number of passages of these tankers is 16 per annum.
- 5- In the case that a vessel has an incident within the limits of the Straits; previously the master was given the opportunity to rescue his vessel on his own/by his own rescue plan, whereas with the new measures, the Harbour Masters are given authority to intervene to the incident directly for salvage operation.

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- 6- Regardless of the type of the vessel, all of the vessels over 250 meters of size, have to receive tugboat and pilot assistance during their passages with this new measures.
- 7- With the new regulation, overtaking of vessels will completely be at the discretion of VTS.
- 8- As a new measure, the vessels are not permitted to get closer to already existing or newly to be constructed bridge piers/legs more than 100 meters.

We, as Deniz Emniyet Dernegi (Maritime Safety Association), are welcoming the new safety measures at Turkish Strait regions with pleasure.

Preparing the rescue/salvage plan for the vessels having accident within the Strait area will no more be left to the initiative of the master. The Harbour Masters will now apply necessary safety measures with immediate effect. After a couple of casualties / incidents and sea pollutions experienced, this is not only our practice but also the general practice and a part of international contract, performed in all other countries around the world.

As these precautionary measures are all in order, we believe that some other additional measures should also be taken.

Human error is responsible about 85% of all accidents at sea. From this perspective, putting an emphasis on using pilot sound and appropriate. Using the service of pilot at the Straits is an important safety precaution. In addition to this, having tugboat assistance in a tethered position is also of utmost importance.

The minimum length of tankers that will have to use tug escort in Straits should be 150 meters instead of the current lower limit which is 200 meters. We have previously stated as Deniz Emniyet Dernegi (Maritime Safety Association) that the patrolling tugboats at certain locations along the Straits should be considered for immediate intervention in case of any incident / need of assistance.

Also, some technical should be carried out to find out how the tugs can render the most effective escort service at Straits. Rather than non-tethered escort, the tethered assistance of tugboats should be considered. In this respect, some simulation studies should be performed to see how a vessel with 10-12 knots of speed is being escorted by a tethered tug from her aft during the passage. This should be monitored by a simulation study and then the available options/means should be considered accordingly.

As Deniz Emniyet Dernegi (Maritime Safety Association), we hereby declare to Administration and to whom this may concern, that we are ready to contribute to and technically support any study for improving the navigational safety at Turkish Straits.