



# **HELLENIC STRATEGY FOR THE IMPLEMENTATION OF THE IMO INSTRUMENTS IMPLEMENTATION CODE (III CODE)**



*«The Hellenic Republic shall meet efficiently its responsibilities as a flag, port and coastal state by taking action for the effective implementation of the relevant international mandatory instruments pertaining to the areas listed in Part I para. 6 of the III Code (A. 28/ Res.*

*1070/10.12.2013), to which it is a party. In doing so, Greece shall maintain a proactive maritime administration ensuring that all laws, regulations and recommendations are implemented and enforced effectively, thus guaranteeing that flag, port and coastal state obligations are fully met»*

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### **I. Foreword**

Maritime transport is the backbone of world trade and globalization and the most essential pillar of cross-border transport networks that support global supply chains. This particular economic sector generates employment and revenue, permitting and supporting a whole range of sectors and activities.

Greece is one of the world's largest shipping nations and Greek shipping is one of the most dynamic sectors of the national economy. Greek shipping maintains a leading role in the international shipping industry, providing high quality maritime services with a modern fleet, operating with the most up-to-date management techniques and the highest safety and environmental standards.

Greek shipping, operating mostly in international trade between third countries (cross-trade), faces the adverse effects of regional or national measures which differentiate substantially from the international standards of IMO. In this respect, the major strategic objective of the Hellenic Maritime Administration is to advance IMO's mission of promoting safe, secure and efficient shipping on clean oceans. The adoption and implementation of international standards applicable to all ships, irrespective of their flag is the only guarantee for ensuring a global level playing field for shipping, alongside preserving high standards of safety and environmental protection. In addition, particular emphasis is attributed to the principles of United Nations Convention on the Law of the Sea (UNCLOS 82), and the generally accepted international rules and standards adopted under its auspices, which provide the required legal certainty for effectively promoting the sustainable use of our oceans and their protection, whilst respecting the freedom of navigation on the high seas and other traditional but always essential navigational rights.

This strategy has been developed by the Hellenic Republic to assist Government Agencies and Entities to implement its core obligations of substance as a Member State of the International Maritime Organization (IMO). The Strategy is based on the requirements of the IMO Assembly Resolution A.1070 (28) i.e. the IMO Instruments Implementation Code (III Code), as incorporated into national law.

The Ministry of Maritime Affairs & Insular Policy (MMAIP) and the Hellenic Coast Guard (HCG) under its auspices shall be the lead agency in the implementation of the IMO Instruments, in collaboration with relevant government agencies, to provide specialized services in fulfillment of Greece's international obligations under the IMO Conventions. Each responsible government agency, while performing its statutory mandate, shall in parallel collaborate with other Agencies to meet Greece's obligations as a Flag, Port and Coastal State.

The Flag, Port and Coastal State functions are an essential part of responsibility for the HCG except: **(i)** functions delegated to Recognized Organizations under its supervision and **(ii)** functions performed by other government bodies in accordance to their mandate, in collaboration with the HCG. This Strategy describes in detail the functions performed for the implementation of the IMO Conventions within the scope of the III Code.

### **II. Vision Statement**

The Hellenic Republic shall meet efficiently its responsibilities as a flag, port and coastal state by taking action for the effective implementation of the relevant international mandatory instruments pertaining to the areas listed in Part I para. 6 of the III Code (A. 28/ Res. 1070/10.12.2013), to which it is a party. In doing so, Greece shall maintain a proactive maritime administration ensuring that all laws, regulations and recommendations are implemented and enforced effectively, thus guaranteeing that flag, port and coastal state obligations are fully met.

### **III. General objective**

Greece shall maintain a maritime administration capable of ensuring full compliance with all its flag, coastal and port state obligations and responsibilities, by taking action to implement and enforce effectively the relevant mandatory IMO Instruments to which it is a party.

### **IV. Policy for the achievement of the objectives**

The Hellenic Maritime Administration is committed to ensure the highest quality of the safety of navigation and prevention of marine pollution within waters under its jurisdiction and on ships flying its flag.

The premise of this commitment is the historical, ethical, legal and social necessity to ensure timely and effective compliance with the provisions of the UNCLOS 82, international regulations, procedures and practices contained in IMO instruments and other mandatory instruments to which Greece is a party, as well as, to the extent relevant, through the implementation of the relevant EU acquis.

### **V. Duration and implementation arrangements**

The Hellenic Republic's strategy is implemented from the time of its entry into force in 2021, through appropriate communication to all actors involved and shall remain valid until 31.12.2027, to correspond to a typical IMSAS audit cycle<sup>1</sup>. A Memorandum of Cooperation is signed with government and other bodies that do not belong to the administrative structure of the MMAIP.

The overall coordinating body for the implementation of this strategy is the MMAIP. In practical terms and until the first audit of the Hellenic Republic under IMSAS (December 2021), coordination is effectuated via the Coordination Team (SOP) established by Ministerial Decision 2213.6-3.2/ 77044/2018/ 18.10.2018. A Coordination Team will be established by means of a Ministerial Decision and will be convened in a yearly basis in order to evaluate the implementation of this Strategy.

### **VI. Hellenic Maritime Administration**

In order to fulfil its responsibilities as a State Party to the international conventions developed under the aegis of the IMO and the ILO, the Hellenic Republic has a maritime administration composed of:

**The Ministry of Maritime Affairs and Insular Policy (MMAIP):** The Hellenic Republic has entrusted a specialized administrative body, the MMAIP with the administration and support of Greek shipping. The MMAIP aims at fostering economic development and growth, securing social cohesion and safeguarding maritime safety, security and environmental protection. The MMAIP, through the appropriately qualified personnel (officers of the Hellenic Coast Guard and civilians), supports Greek shipping throughout the year on a 24/7 basis, in order to handle all issues faced by Greek vessels and their seafarers around the globe. Furthermore, the MMAIP has a principal role in drafting and promulgating maritime laws and regulations on safety, security and environmental protection for the effective operation of merchant shipping (including but not limited to Merchant Public Shipping Code, Regulations of navigation in the territorial waters of the Hellenic Republic e.t.c.), enforces compliance with national legislation and international instruments and strives to ensure the safety of maritime navigation. In addition, the MMAIP strives to eliminate substandard shipping and ensure the quality of ships by carrying out inspections on ships flying the national flag and port state control on foreign flagged ships within Greek ports and anchorages, whilst promoting and managing the Hellenic registry and taking measures to minimize the environmental impact of shipping. As stressed, the MMAIP operates as the overall Coordinating Body for the implementation of the strategy and the fulfillment of the Hellenic Maritime Administration's responsibilities as flag, coastal and port state under the applicable IMO conventions.

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<sup>1</sup> See also the 7-year period of EU Directive 2009/21.

**The Ministry of National Defense (MoND):** The following public entities operate under the Ministry of National Defense:

(a) the Hellenic Navy Hydrographic Service (HNHS) is a government agency that has exclusive competence and certification to draw up, publish, supplement and correct the official nautical charts of Greece and their updates, as well as to publish, supplement and correct official nautical publications<sup>2</sup>. Moreover, the HNHS publishes in printed and/or electronic format, navigational aids and instructions, notices, messages and announcements, wave forecasts and oceanographic information, contributing to the promotion and development of shipping and navigation safety. Last but not least, the HNHS is the National Coordinator for the management and operation of NAVTEX Service, in accordance with national and international law and practice,

(b) the Hellenic National Meteorological Service (HNMS) is the national competent authority with the exclusive jurisdiction to provide Marine Meteorological Services. For the implementation of the GMDSS, has accepted the responsibilities of "Issuing Service" for the METAREA-3 and "Preparation Service" for the east part of this area and for the IMO/WMO Worldwide Met-Ocean Information and Warning Service (WWMIWS), is "METAREA-3 Coordinator"<sup>3</sup>. Furthermore, the HNMS maintains ship meteorological stations under the WMO's Voluntary Observing Ship (VOS) Scheme and by all means promotes this programme. In order to improve its services to the interested parties and also to contribute to the development of the meteorological services at European and international level the HNMS has established a lot of European and international cooperation<sup>4</sup> and

(c) the Hellenic Navy Lighthouse Service (HNLS) is the competent Authority for the installation, maintenance repair and supervision of any navigational aids, within the framework of Law 4278/2014. Furthermore, it is responsible for forwarding information on navigational aids to the HNHS in order to issue the relevant Maritime Information Note.

**The Ministry of Environment, Energy and Climate Change:** The main mission of the Ministry is the protection of the natural environment and its resources, the improvement of quality of life, the mitigation and adjustment to the implications of climate change and the enhancement of mechanisms and institutions for environmental governance. It is, therefore, involved in issues pertaining to the protection of the environment from vessel-source pollution, while it is also responsible for licensing and keeping a register of fuel oil suppliers.

**The Hellenic Bureau for Marine Casualties Investigation** (HBMCI) is an independent and impartial Organization of the Hellenic Republic operating within the MMAIP, competent for conducting safety investigations into marine casualties and incidents that occur in direct connection with the operation of vessels flying the Hellenic flag, vessels flying other flags within the Hellenic territorial waters or within the Hellenic Search and Rescue region, provided that SAR services were provided by Greek Authorities, as well as any casualty or incident involves substantial interests of Greece. The HBMCI was established by Law 4033/2011 (G.G. 264 A'), as applied.

## **VII. Objectives of the strategy**

The main **objectives** of the strategy are the following:

**1. Effective and efficient implementation and enforcement of the mandatory IMO instruments** (as a Contracting Government, a Flag State, a Coastal State and a Port State).

**2. Continuous review and verification of the effectiveness of the State in respect of meeting its international obligations.** For the purpose of the evaluation of this Strategy, the elements

<sup>2</sup> The scope of HNHS is to study the Greek and the adjacent seas, coasts and ocean as well as the navigation conditions in order to contribute to the development and the promotion of the sciences and arts related to navigation, hydrography, oceanography, shipping and maritime meteorology. More specifically, the HNHS collects processes and uses information and data to generate products and services related to Hydrography, Naval Cartography, Marine and Military Oceanography in order to: (i) support and meet the operational requirements of the HN and National Defense, in general, on matters that fall under its competence; (ii) contribute to the safety of seafarers in Greek and neighboring seas; (iii) protect the marine environment; (iv) contribute to the growth of the economy of the country's islands; (v) assist and support, where required, public services, legal and natural persons, and private entities in their work.

<sup>3</sup> see MSC.1/Circ.1310/Rev.1/21.11.2014 "Revised Joint IMO/IHO/WMO Manual on Maritime Safety Information – MSI"

<sup>4</sup> The HNMS represents Greece in the following international organizations: WMO, ECMWF, EUMETSAT, EUMETNET, ECOMET, IMO, IHO, ICAO and NATO

prescribed in Annex I should be submitted on an annual basis to the Coordination Team by the relevant entities having responsibilities in implementing and enforcing the applicable IMO instruments.

**3. Effective cooperation among institutions.** The MMAIP and other entities having responsibilities in implementing the IMO's instruments to which Greece is a Party to, shall cooperate to ensure the effective implementation of these instruments. Procedurally, cooperation shall be put in place by means of the Coordination Team described in Part V of the Strategy and/ or though a Memorandum of Cooperation or other contractual arrangement, depending of the entity involved in the implementation of the Strategy.

### **Objective N°1: Effective implementation and enforcement of the mandatory IMO instruments**

Greece has certain rights and obligations under various international instruments. When exercising its rights, Greece incurs additional obligations as a contracting government, a flag State, a port State and coastal State.

#### **1. Obligations as a Contracting Government**

The Hellenic Republic became a member of the International Maritime Organization in 1958. Since then, Greece has ratified all major IMO Conventions which promote safety of navigation, vessel safety, protection of marine environment and social issues. In particular, the Hellenic Republic is a party to the relevant international mandatory instruments as follows:

- i.The International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS 1974); Law No. 1045/1980.
- ii.The Protocol of 1988 relating to the International Convention for the Safety of Life at Sea, 1974, as amended (SOLAS PROT 1988); Law No. 2208/1994.
- iii.International Convention for the Prevention of Pollution from Ships, 1973, as modified by the Protocol of 1978 relating thereto, as amended (MARPOL 73/78); Law No. 1269/1982.
- iv.The Protocol of 1997 to amend the International Convention for the Prevention of Pollution from Ships of 2 November 1973, as modified by the Protocol of 17 February 1978 (MARPOL PROT 1997); Law No. 3104/2003.
- v.International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, 1978, as amended (STCW 1978/95); Law No. 1314/1983.
- vi.International Convention on Load Lines, 1966 (LL 66); Mandatory R.D. No. 391/1968.
- vii.Protocol of 1988 relating to the International Convention on Load Lines, 1966 (LL PROT 1988); Law No. 2209/1994., P.D. 119/2007
- viii.International Convention on Tonnage Measurement of Ships, 1969 (Tonnage 69); Law No. 1373/1983.
- ix.Convention on the International Regulations for Preventing Collisions at Sea, 1972 (COLREG 1972); Legislative Decree No. 93/1974.

The IMO Conventions are incorporated into national legislation in accordance with the Constitutional Procedure for all international Conventions, i.e. by ratification laws published in the Official Government Gazette (dualistic approach). Amendments are transposed to the national legal order either by Presidential Decrees or by Ministerial Decisions, depending on the relevant provisions, as stated in the respective ratification law. The amendments are also published in the Government Gazette. Mandatory IMO Resolutions with reference to mandatory Codes are incorporated either by Presidential Decrees or Ministerial Decisions, published in the Government Gazette.

The competent Directorates of the MMAIP undertake the responsibility of transposing all ratified conventions, as amended, into national laws and to publish them in the Official Government Gazette (G.G). Enactment of domestic instruments to implement the ratified international conventions is a continuous process which is initiated after the adoption of a mandatory requirement of a competent IMO organ. Furthermore, the MMAIP shall fulfill mandatory reporting requirements specified in the IMO instruments through the routine transfer of data to IMO's Global Integrated Shipping Information System (GISIS).

After the transposition of an IMO instrument or amendment thereof into the national legislation, the respective legal text (law/ presidential decree/ ministerial decision) is published in the G.G. thus rendered publicly accessible. Then it is further communicated to all interested parties by the relevant competent authorities through a circular or a communication letter, which is issued for this purpose.

The competent state authorities which implement each piece of legislation should assess, at various stages, the need for further initiatives such as developing policies on statutory, regulatory or technical issues which emanate from the applicable legislation or an interpretation thereof etc. Feedback made available by parties involved in the implementation process as well as respective requests are taken into consideration.

In implementing mandatory instruments, the MMAIP also performs enforcement activities by carrying out flag state control of the ships flying the flag of the Hellenic Republic and port state control inspections of foreign flagged ships operating in the territorial waters of the Hellenic Republic.

## **2. Greece as a Flag State**

The Greek fleet consists mainly of vessels engaged in international trade. Greece attaches special attention to its obligation as a Flag State. Supervision over the technical conditions of the Greek fleet is carried out by both the HCG and ROs. Strict requirements established with regard to HCG personnel and ROs shall result in surveys and inspections carried out to an extent and in manner which will eliminate the possibility of ships that do not meet shipping safety and marine environment protection standards required by law. Furthermore, there are procedures for the administrative investigation of maritime casualties under national legislation.

### **2.1     *Inspections and audits***

The MMAIP recognizing the importance of maintaining a high level of safety performs flag state inspections to all registered ships engaged on domestic – national and on international voyages, on a timely basis, utilizing capable personnel and in conformity with the applicable international and national laws and standards.

The MMAIP carries out oversight on the proper technical condition of the national fleet. All the required surveys, inspections and audits are carried out to an extent and in a manner which ensure compliance with the national instruments (which apply international instruments to which the Hellenic Republic is a party), as well as recommendations and best practices.

Mindful of the importance of easy and quick access to data concerning the national fleet and the inspection carried out, the MMAIP has developed and implements a ship inspection database to collect and store relevant information and disseminate them to the relevant services.

### **2.2     *Monitoring of Recognized Organizations (ROs)***

The MMAIP may authorize ROs to perform statutory inspections and certification services or withdraw such authorization, according to national, international and EU Regulations. With the view to maintain Greek Flag in the white list of Paris MOU, any authorization or withdrawal shall be also evaluated on the basis of the safety and pollution prevention performance of the Organization's ships, through the MOUs

The ROs are subject to regulatory oversight and are accountable to the MMAIP. The MMAIP, by entering into an agreement with ROs, entrusts them with supervision over ships flying the Greek flag but remains ultimately responsible for the level of safety on these ships. In order to meet international requirements, MMAIP makes reference to IMO Res. MSC 349 (92) "Code for recognized organizations" (RO Code) when supervising ROs.

## *2.3 Digital registry of ships and provision of digital services to the maritime community*

The MMAIP is in the process of developing an integrated information system for the provision of modern digital services to the maritime community, regarding administrative procedures related to ship-registration. The ship registration system will also provide information on ships and ship-owning companies to other information systems of the Hellenic maritime Administration.

## *2.4 Training and certification of seafarers*

The Hellenic Republic recognizes that maritime safety and security, prevention of pollution of the sea as well as operational efficiency depend greatly on the behavior, conduct and qualifications of ships' crews. Seafarers are trained and certified in accordance with the requirements of the International Convention on Standards of Training, Certification and Watchkeeping for Seafarers (STCW 78/95) as amended by the 2010 Manila Amendments.

The MMAIP formulates a balanced maritime policy that keeps pace with technological advances in pursuance of meeting economic, social and commercial demands. The Greek Public Maritime Education & Training System ensures a high level of vocational training. The ultimate objective of the MMAIP is to ensure adherence to qualitative and upgraded public maritime education based on current and future demands, European Union and international standards. This choice is also dictated by the fact there is traditionally significant recourse of young people to the maritime profession, while the need for more and better trained seafarers comes along with the increase of the global fleet and technological developments.

The MMAIP is responsible for the development and implementation of educational, training and post-training programs for seafarers, the proper functioning of schools and the design and implementation of measures aimed at attracting young people to the maritime profession as well as the issuance of certificates (competency or proficiency). The continuous reorganization and modernization of the maritime education & training system is a constant objective of the MMAIP in order for the Greek seafarers to become competitive and have immediate access to employment being indispensable factor of shipping competitiveness.

In this context, the Hellenic Maritime Administration responds to modern requirements posed by international conventions and the relevant European legislation, incorporating and implementing all relevant amendments.

At the same time, and bearing under consideration that maritime training and further education is considered to be the basis for reproduction and expansion of the Hellenic shipping know-how, Greece implements Quality Management System as per EN ISO 9001/2015 standard, invests in the technological modernization of Merchant Marine Academies with the exploitation of the available funding mechanisms (NSRF 2014-2020, 2021-2027), and installs modern informational systems for e-learning. The existing network of Merchant Marine Academies in Greece provides training up to the contemporary needs for efficient shipping, in parallel with the establishment of new education modules and the upgrading of the Centers of Further Education for Seafarers (KESEN) coupled with the organization of open conferences concerning current issues of modern shipping.

## *2.5 Investigation of maritime casualties*

The Hellenic Republic recognizes the vital importance to carry out safety investigations on the causal factors of the marine casualties occurring on the ships flying the Greek flag in order to draw useful conclusions that lead to safety recommendations or proposed actions with the aim to prevent reoccurrence. Marine casualty investigations are conducted in accordance with the IMO Resolution MSC. 255 (84), as incorporated into national legislation by Ministerial Decision no 611.22/ 14/ 3013 (G.G. B 3199) and IMO Resolution A.1075 (28) and where necessary cooperation with other substantially interested States is established by the HBMCI.

Investigations conducted by the HBMCI (<http://www.hbmci.gov.gr/indexEng.htm>), are independent from criminal or other administrative or disciplinary proceedings which are held to apportion blame or

determine liability, and focus on identifying the causes and contributing factors that led to a marine accident or incident, with the objective of preventing future marine accidents or incidents, with the aim to enhance the maritime safety and the protection of marine environment. For this reason, HBMCI issues safety recommendations, addressed as appropriate to the involved or interested parties in a marine casualty (indicatively to Managers/Owners, the Administration and other maritime stakeholders). During the conduct of safety investigations HBMCI takes under particular consideration the guidelines on «fair treatment of seafarers», as stipulated in Res. A. 987(24) and LEG 3.(91).

### **3. Greece as Port State**

The Presidential Decree No.16/2011 (G.G. A 26), as amended, which transposed into the national legislation the EU Directive 2009/16 constitutes the legal basis for performing port state control inspection in Greece.

Greece is a signatory Country to the Paris Memorandum of Understanding (Paris MoU) on Port State Control since 1982. Thenceforth, Greece fully complies with the requirements of the regional agreement and implements the procedures that derive from the Memorandum, with regard the port state control system.

In the field of maritime safety and in full alignment with the existing international and EU legislation, Greece ensures compliance with the terms and conditions of safety of navigation, following closely the relevant international developments. In this context, it organizes and supervises the inspections of foreign flag ships calling at Greek ports and anchorages, in accordance with the inspection procedures provided for under the Paris MoU on Port State Control and the relevant mentioned above EU legislation as it is transposed into the national legal system, in order to ensure that the construction, management, manning, equipment and safety onboard are in accordance with the requirements of the International Conventions.

### **4. Greece as Coastal State**

Greece has a coast line of over 18.400 km, more than 9.000 islands and is in the crossroad by connecting three continents. Over 125.000 ships per year pass through the territorial waters, the majority of which are fishing vessels and yachts. As a Coastal State, Greece seeks to ensure efficient and effective services for safety of navigation according to the International Convention for the Safety of Life at Sea (SOLAS 1974), Chapter V and protection of marine environment from pollution.

The services of the State ensure the availability and dissemination of complete and accurate information concerning dangers to navigation and persons at sea by promulgating official navigational warnings, weather forecasts and meteorological warnings. Moreover the establishment and maintenance of suitable safety of navigation systems for the safety of navigation in the sea areas under Hellenic jurisdiction; ensure the validity of information concerning the Hellenic Republic maritime areas, which are published in nautical charts and publications and periodically reviews the volume of traffic and the level of risks so as to provide adequate aids to navigation. In case of a threat to human life at sea, the JRCC provides efficient maritime search and rescue services (SAR – see also para 4.4.5). Safety of navigation is supported through ship-reporting and ships' routing system, the effectiveness of which is evaluated on a constant basis.

#### **4.1           *Protection of the marine environment***

The MMAIP is the competent authority for the prevention of marine pollution by oil and other harmful substances, as well as for supervision and coordination of operations in response to marine pollution incidents at sea and coasts from vessels and land-based sources. This is achieved by preparing and organizing the necessary initiatives for the use of anti-pollution equipment and the active involvement of state and private actors in the framework of the National Contingency Plan, so that in case of a pollution accident or even risk of pollution at the sea or coasts, coordinated action is taken in order to diminish possible adverse impacts on the marine environment.

In addition to national pollution control and surveillance framework, Greece works closely with the European Maritime Safety Agency (EMSA), making optimum use of the integrated maritime surveillance services and operational assistance capabilities in the event of a pollution incident provided by EMSA (satellite surveillance data, Network of Stand-by-Oil Spill Response Vessels chartered by EMSA).

Furthermore the MMAIP takes appropriate measures to reduce the marine pollution by ensuring that ship-generated waste and cargo residues are not discharged into the marine environment but delivered to port reception facilities. The compliance with the international regulations is monitored through targeted inspections and improved enforcement regime that discourages infringement of applicable laws. Considering Sustainable Development Goals 13 “*Take urgent action to combat climate change and its impacts*” and 14 “*Conserve and sustainably use the oceans, seas and marine resources*”, the MMAIP aims at prohibiting and diminishing releases into the maritime environment to ensure that there are no significant impacts on or risks to marine ecosystems, human health and legitimate use of the sea.

#### 4.2 Navigational warnings

The Safety of Navigation Division of the H.N.H.S. is responsible for the promulgation of Maritime Safety Information (MSI). The MSI consists of Navigational warnings<sup>5</sup>, Weather Forecast and METEO warnings, with a view to informing seafarers on matters affecting navigation safety. They are broadcasted either by the established Hellenic NAVTEX System<sup>6</sup> and/ or by voice on VHF and MF frequencies. Moreover, the HNHS issues notices and navigational warnings.

#### 4.3 Marine Meteorological Services

The HNMS is providing Marine Meteorological Services including: **(a)** Services for the High Seas, for Coastal, Offshore, and Local Areas<sup>7</sup>, which include Marine Warnings and Forecasts. For the provision of MSI, a Quality Management System (QMS) is implemented putting in place very high standards for marine forecasting accuracy, broadcasting timeliness, end-user satisfaction etc, and is EN ISO 9001:2015 Certified, **(b)** Meteorological Support for Maritime Search & Rescue and **(c)** Services in Support of Marine Environmental Emergency Response at national and international level as part of the WMO Marine Pollution Emergency Response Support System (MPERSS).

#### 4.4 Hydrographic services

The HNHS studies, prepares, publishes and distributes nautical charts and publications and aids in printed or electronic format, catering to the needs of seafarers and the operational requirements of the Hellenic Navy (HN) and the Armed Forces in general. Moreover the HNHS conducts oceanographic,

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<sup>5</sup> Indicatively, the following subjects of Navigational Warnings are suitable for broadcasting: 1.Casualties to lights, fog signals, buoys and other aids to navigation affecting main shipping lanes, 2. The presence of dangerous wrecks in or near main shipping lanes and, if relevant, their marking, 3.Establishment of major new aids to navigation or significant changes to existing ones, when such establishment or change might be misleading to shipping, 4.The presence of large unwieldy tows in congested waters, 5. Drifting hazards (including derelict ships, ice, mines, containers, other large items over 6 meters in length, etc.), 6.Areas where search and rescue (SAR) and anti-pollution operations are being carried out (for avoidance of such areas), 7.The presence of newly discovered rocks, shoals, reefs and wrecks likely to constitute a danger to shipping, and, if relevant, their marking, 8.Unexpected alteration or suspension of established routes, 9.Cable or pipe-laying activities, seismic surveys, the towing of large submerged objects for research or exploration purposes, the employment of manned or unmanned submersibles, or other underwater operations constituting potential dangers in or near shipping lanes, 10. The establishment of research or scientific instruments in or near shipping lanes, 11. The establishment of offshore structures in or near shipping lanes, 12. Significant malfunctioning of radio-navigation services and shore-based maritime safety information radio or satellite services, 13. Information concerning events which might affect the safety of shipping, sometimes over wide areas, e.g. naval exercises, missile firings, space missions, nuclear tests, ordnance dumping zones, etc., 14. Operating anomalies identified within ECDIS including ENC issues, 15. Acts of piracy and armed robbery against ships, 16. Tsunamis and other natural phenomena, such as abnormal changes to sea level, 17. World Health Organization (WHO) health advisory information, 18. Security-related requirements.

<sup>6</sup> The HNHS issues NAVTEX messages related to maritime safety, being the national coordinator of the system, in cooperation with the Ministry of Shipping, the National Meteorological Service, the Hellenic Telecommunications Organization (OTE) and other competent bodies.

<sup>7</sup> According to IMO Res. A.705(17) “Promulgation of Maritime Safety Information (MSI)”

cartographic and maritime works and studies and put in place research programs to collect data and information required to create products related to supporting the HN and meeting the needs of military and other agencies. In addition, the HNHS has installed, operates and monitors the sea level measurement system (National Tide Gauge Network), as well as stations for measuring parameters of various natural phenomena, such as waves, currents, etc, with a view to collecting data to be used to generate products and services related to its mission. Finally the HNHS plan, design and conduct Hydrographic Surveys with the Hydrographic- Oceanographic vessels data collected are processed to draw up relevant studies and charts, which are then forwarded to the competent directorates and serve to update navigational charts and nautical publications and disseminate maritime information to end users.

#### 4.5        *Search and rescue services*

In case of a threat to human life at sea, the MMAIP provides maritime search and rescue services (SAR) on a 24/7 basis.

In particular, the coordination of SAR incidents within the Hellenic Search and Rescue Region (SRR), which coincides with the FIR ATHINAI and has been submitted to the compete services of the IMO, is provided by the Joint Rescue Coordination Center (JRCC)<sup>8</sup>, which operates based on the procedures and recommendations set out by the IMO IAMSAR Manual. The SAR area extends to an area of over 1.150.000 Km<sup>2</sup>.

The JRCC is responsible for promoting the effective provision of search and rescue services and for coordinating the conduct naval and air SAR operations within its area of responsibility

Distress and safety communications are monitored and coordinated via the Coastal Radio Station (CRS) of OLYMPIA Radio, which is operated by OTE, and consists of four sub-networks covering the four Sea Areas (universal sea coverage), on behalf of the HCG, under the provisions of a contractual commitment. Part of the OLYMPIA Radio network of stations, is the Land Earth Station (LES) of Thermopylae, responsible for Inmarsat satellite communications. The HCG is also a Ground Segment Provider for COSPAS-SARSAT distress alert signals, operating a Mission Control Centre (GRMCC), with the associated GEOLUT, LEOLUT and MEOLUT stations.

Special arrangements are also in place to provide Telemedical Assistance Services (TMAS) to seafarers, via OLYMPIA Radio CRS. Additionally, the HCG operates additional CRSs (JRCC Piraeus and Aspropyrgos Radio), for operational, as well as distress communications, as a backup to the OLYMPIA Radio CRS. All relevant GMDSS infrastructure information is regularly communicated to IMO for updating of the "GMDSS Master Plan".

The HCG maintains close cooperation domestically with all responsible Authorities and governmental bodies, such as the Hellenic Navy and Air Force, the Fire Service, the Hellenic Police, the General Secretariat for Civil Protection, the National Center of Emergency Care, etc. In this regard the contribution of the Hellenic Armed Forces has proven to be crucial, taking into account that the Hellenic Navy is providing surface and aerial assets and the Hellenic Air Force is providing aerial assets, to increase national Search and Rescue capacity. Cooperation with the private sector is also encouraged on a local level, where the Local Coast Guard Authorities issue SAR contingency plans, documenting all pertinent information for SAR response and crisis management (including, but not limited to: volunteer network, municipal infrastructure, local Unions and Associations, etc). The HCG has set up the necessary arrangements, in accordance with SOLAS regulation V/7.3, for the establishment of plans for cooperation between passenger ships and SAR services, taking measures to provide guidance to relevant stakeholders, perform periodic exercises, as well as to ensure the enforcement of the relevant provisions.

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<sup>8</sup> JRCC's activities are assisted, as required, by five (05) Maritime Rescue Sub Centers within the Hellenic SRR, namely the MRSCs of Patra, Chania, Rhodos, Mytilini and Thessaloniki.

In addition, OTE provides GMDSS Services to the National Search & Rescue Authorities for the Safety of Life at Sea. Operations comply with the IMO standards and include in general: uninterrupted watch-keeping in international distress frequencies, exchange of Distress and Safety voice and data information, GMDSS bulletins (maritime safety information broadcasts, weather warnings, medical info, etc.). Network operations are aligned with the GMDSS standards. The coordinates of the Coastal Sites are declared to IMO Master Plan by HCG.

Moreover emergency/SAR response plans issued by Coast Guard authorities for their area of jurisdiction are submitted to the Headquarters and frequently tested by means of local exercises. The HCG keeps monthly and annual statistics on SAR incidents and distress communications. All data collected under those processes, are used in the context of the evaluation of effectiveness of the SAR mechanism and based on the outcome of this evaluation, procedures are kept up-to-date and efficient. Sample checks are also conducted on regular intervals to verify the accuracy of collected information and the compliance to the rules and procedures.

#### 4.6 *Aids to navigation*

The HNLS ensures the operation, installation, maintenance/ repair, replacement/ removal of torches and navigational aids. The relevant information on navigation aids is also forwarded to the HNHS, in order to issue the relevant Maritime Information Notice.

#### 4.7 *Ship routing, ship reporting systems and vessel traffic services*

The effective management of the territorial sea is ensured via the three (03) IMO TSS and ATBA<sup>9</sup> and seven (07) Vessel Traffic Systems<sup>10</sup> operating in a mandatory basis on national level and in accordance to the IMO Guidelines Assembly Resolution A.857 (20). All VTS stations provide Information Services (INS).

Furthermore, a National Maritime Single Window is implemented on reporting formalities for ships arriving in and/or departing from Greek ports.

### **Objective N°2: Continuous review and verification of the effectiveness of the State in respect of meeting its international obligations**

The identification and elimination of non-conformities constitute a key element of a Quality Management System. It is the prerequisite for undertaking successful preventive and corrective actions to address identified deficiencies and avoid reoccurrence. In this context, the essential steps, methods and techniques applied, so that a root cause analysis is effectively implemented, are respectively reflected in the System's set of procedures, which support the operation of the System itself. In this respect several of the operational parts of MMAIP, endowed with the implementation of IMO Conventions, have an established and fully documented Quality Management System certified to the latest ISO Standards (ISO 9001: 2015), which provides policies and goals to establish and maintain the statement of policy of the Hellenic maritime administration. It is incumbent upon those employees of the MMAIP to be familiar with and committed to implementation, enforcement, measurement and achievement of the goals set out herein. Risk is inherent in all aspects of a Quality Management System, for a systematic approach to identify, minimize and control it has been established. Identifying potential non conformities to prevent reoccurrence is a practice integral to ensuring that the performance of an entity improves.

In parallel, an internal circular setting out a framework for internal review and evaluation of the MMAIP services involved in the implementation of relevant IMO instruments has been put in place since 2007. The circular was fully updated in 2020, in order to correspond to legal and organizational developments.

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<sup>9</sup>TSS "Saronikos Gulf" (A.338 (IX)/12 Nov. 1975), TSS "In the Approaches to the Port of Thessaloniki" (MSC 85/2008), ATBA "In the Region of the Vorai Sporades Islands (A. 827 (19)/23-11-1995)

<sup>10</sup>Piraeus Traffic, Patra Traffic, Rio Traffic, Kerkyra Traffic, Igoumenitsa Traffic, Rafina Traffic and Lavrio Traffic (For the time being, the last two Traffic controls provide information on a voluntary basis)

On top of the above, the Hellenic Maritime Administration shall monitor its performance by using the elements referred in Annex 1. As mentioned, the elements prescribed in Annex 1 should be submitted on an annual basis to the Coordination Team.

#### **Objective N° 3: Effective cooperation among institutions**

As stated in this strategy, it is of utmost importance to observe and verify the effectiveness of the relevant institutions in terms of the fulfillment of their responsibilities arising from the international conventions, to deliver, maintain and develop the organizational performance as a whole.

The MMAIP and other responsible public and private entities or bodies shall cooperate to the shared objective of enhancing the implementation and the enforcement of mandatory IMO instruments. This coordination will be effectuated in the manner described in Part V of the present Strategy.

## Annex I

### Elements for Evaluation of the Hellenic Strategy for the Implementation of the III Code

<b>Goal</b>	<b>Elements for Evaluation</b>	<b>Responsible Entity</b>
<b>Effective Implementation and Enforcement of International Conventions</b>	100% participation at the IMO Committee and Sub-committee meetings	<b>MMAIP</b>
	100% timely transposition of mandatory instruments into national law	<b>MMAIP or other concerned entity</b>
	100% communication of national legislation to the IMO with regard to the transposition & implementation of international conventions	<b>MMAIP</b>
<b>Strategy Implementation and Monitoring</b>	Strategy MoC and/or other contractual arrangement amongst involved stakeholders evaluated on a yearly basis	<b>MMAIP or other concerned entity</b>
	Annual submission of the required data in the present Annex to the Coordination Team for the purpose of the evaluation of this Strategy	<b>All concerned entities</b>

### Flag State Performance

<b>Goal</b>	<b>Elements for Evaluation</b>	<b>Responsible Entity</b>
<b>Surveys and Inspections</b>	Maintaining Greek Flag in the White List of the Paris MoU	<b>MMAIP</b>
	Follow up action (investigation) on 100% of Greek Flagged ships detained under PSC regimes	<b>MMAIP</b>
<b>Monitoring of ROs</b>	An oversight programme for monitoring ROs to be conducted every two years	<b>MMAIP</b>
<b>Flag State Surveyors</b>	Continuous training of all flag state surveyors within a 5 year period	<b>MMAIP</b>
	Address 100% of the requests for inspection/ certification of greek	<b>MMAIP</b>

	flagged vessels	
	Internal evaluation of the flag surveyors' knowledge and performance on an annual basis	<b>MMAIP</b>
<b>Training and Certification of Seafarers</b>	Maintaining Greece in the STCW Compliance list (MSC.1/Circ.1164, latest revision – White list)	<b>MMAIP</b>
<b>Investigation of Discharges in Violation of MARPOL's Regulations</b>	100% investigation of discharges in violation of MARPOL's Regulations pursuant to Art. 4 and 6 of MARPOL	<b>MMAIP</b>
<b>Effective Investigation of Marine Casualty</b>	A database of Greek flag fleet casualties is maintained up to date	<b>HBMCI</b>
	A documented procedure for admission, training, updating and evaluation of investigators is established.	<b>HBMCI</b>
	100% Investigation rate of very serious marine accidents falling within the scope of IMO Casualty Investigation Code	<b>HBMCI</b>

#### Coastal State Performance

Goal	Elements for Evaluation	Responsible entity
<b>Navigational Warnings Timely Broadcasted</b>	100% of Navigational warnings/ messages received is broadcasted	<b>MMAIP</b>
<b>Meteorological Service Ensured</b>	Broadcast at least twice daily weather information for shipping	<b>HNMS</b>
<b>Effective Hydrographic Services</b>	100% of nautical charts updated when necessary	<b>HNHS</b>
<b>Effective Light &amp; Signal Services</b>	100% of reported light malfunction	<b>HNLS</b>
<b>Effective Search and Rescue Service</b>	100% address rate at maritime distress messages received	<b>JRCC</b>
	Effectiveness of SAR plans to be evaluated at least once a year	<b>JRCC</b>

<b>Prevention of and Response to Pollution Incidents</b>	Contingency planning established	<b>MMAIP</b>
<b>Investigation of Discharges in Violation of MARPOL's Regulations</b>	100% investigation of discharges in violation of MARPOL's Regulations pursuant to Art. 4 and 6 of MARPOL	<b>MMAIP</b>

### Port State Performance

<b>Goal</b>	<b>Elements for Evaluation</b>	<b>Responsible entity</b>
<b>Effective Port State Control</b>	Conduct minimum number of PSC Inspections to achieve the fair share according to Paris MoU Procedures	<b>MMAIP</b>
	Achieve the number of inspections for fuel sulphur content	<b>MMAIP</b>
<b>Effective Provision of Reception Facilities in Ports/Terminals (adequate to receive all waste categories and cargo residues that are produced by ships which normally call to these Ports/Terminals)</b>	Thorough investigation of all the reports received by ships which call to Greek Ports/ Terminals, regarding on alleged inadequacies of port reception facilities	<b>MMAIP</b>
<b>Environmental Responsibilities of the Port State</b>	Establish & maintain register of fuel oil suppliers up to date	<b>Ministry for Environment and Energy</b>
<b>Investigation of Discharges in Violation of MARPOL's Regulations</b>	100% investigation of discharges in violation of MARPOL's Regulations pursuant to Art. 4 and 6 of MARPOL	<b>MMAIP</b>