

Open Letter by the Coastal States of the Baltic Sea and the North Sea with Iceland on the Growing Risks to Maritime Safety to the International Maritime Community

We, the Coastal States of the Baltic Sea and the North Sea (Belgium, Denmark, Estonia, Finland, France, Germany, Latvia, Lithuania, the Netherlands, Norway, Poland, Sweden and the United Kingdom) with Iceland are approaching the International Maritime Community, especially flag and port states, national authorities, flag registries, classification societies, shipping companies, managers and operators as well as seafarers, with this letter.

Dear Members of the International Maritime Community,

Modern maritime transport is fundamentally built on the reliability of satellite-based navigation. For over three decades, global shipping has advanced by developing vessel operations to increasingly depend on the position, timing, and navigation (PTN) data provided by satellite systems. This shift has brought great efficiency but has also created a new dependency.

The accurate and uninterrupted functioning of Global Navigation Satellite Systems (GNSS) is not a technical luxury; it is a critical safety requirement. GNSS signals support not only ship navigation but also precise time synchronization vital for systems such as the Global Maritime Distress and Safety System (GMDSS). Disruption of these signals is a risk to the safety and reliability of maritime transport.

We are now facing new emerging safety situations due to growing GNSS interference in European waters, particularly in the Baltic Sea region. These disturbances, originating from the Russian Federation, degrade the safety of international shipping. All vessels are at risk.

Equally vital is the integrity of the Automatic Identification System (AIS), which plays a key role in traffic coordination, enhances situational awareness and emergency response. Spoofing or falsifying AIS data undermines maritime safety and security, increases the risk of accidents, and severely hampers rescue operations.

We therefore call upon the international maritime community and national authorities to:

1. Recognize GNSS interference and AIS manipulation as threats to maritime safety and security.
2. Ensure vessels have adequate capabilities and properly trained crew as required by international conventions to operate safely during navigation system outages.
3. Cooperate on the development of alternative terrestrial radionavigation systems which may be used in place of GNSS in the event of disruption, loss of signal or interference.

Maintaining trust in maritime navigation requires more than technology – it demands responsibility, transparency, and decisive action. We must ensure that our seas remain safe, including when systems fail or face disturbances.

Furthermore, recognizing the essential role of maritime transport in global trade and the economy, and emphasizing the importance of safe, efficient, and environmentally sustainable shipping, we stress that the full and consistent implementation of the International Maritime Organization (IMO) regulations is fundamental to ensuring maritime safety, the smooth functioning of shipping, and the protection of seafarers and the marine environment, especially in the new emerging situations

affecting safety at sea, such as the increasing use of shadow fleet vessels to circumvent international sanctions.

In order to uphold and strengthen maritime safety in the Baltic Sea and North Sea region, we require that all vessels exercising freedom of navigation strictly comply with applicable international law, whether customary international law or as contracting parties to international conventions, including the 1972 Convention on the International Regulations for Preventing Collisions at Sea (COLREG), the 1974 International Convention for the Safety of Life at Sea (SOLAS), the International Convention for the Prevention of Pollution from Ships (MARPOL) and all other relevant IMO conventions and resolutions which contain the generally accepted international rules and standards referred to in the 1982 United Nations Convention on the Law of the Sea (UNCLOS).

We wish to highlight, in particular, the following:

1. Vessels shall sail under the flag of only one State and vessels that sail under the flags of two or more states, using them according to convenience, may be treated as a ship without nationality, as according to UNCLOS Article 92.
2. Vessels must maintain valid documentation and certification according to the above-mentioned IMO Conventions, including but not limited to insurance or other financial security in accordance with the rules laid down in Article VII of the 1992 Civil Liability Convention and Article 7 of the 2001 Bunker Convention.
3. Companies must maintain a safety management system onboard the vessels operated, according to SOLAS Chapter IX (ISM code).
4. Flag States shall take any steps which may be necessary in order to ensure that ships flying their flag only proceed to sea in compliance with the requirements of the international rules and standards, including investigations for the maintenance of ships' condition after survey according to UNCLOS art. 94 and 217 and SOLAS Regulation I/11. Such steps include prohibiting ships from sailing if they fail to comply with said requirements.
5. Vessels, when underway, shall comply with the applicable requirements of the STCW Convention, SOLAS Regulation V/14, and Rule 5 of the COLREGs regarding bridge watchkeeping and lookout.
6. Vessels shall maintain the AIS and the LRIT equipment continuously in operation according to SOLAS V/19.2.4.7 and A.1106(29) and SOLAS V/19-1.5.
7. Vessels must provide information about ship identification and any other required information when entering an area covered by a ship reporting system according to SOLAS V/11.7:

SOLAS V/11.7: 7 The master of a ship shall comply with the requirements of adopted ship reporting systems and report to the appropriate authority all information required in accordance with the provisions of each such system.

8. Vessels must maintain clear communication with relevant maritime authorities including in communication regarding Ship Reporting Systems and Vessel Traffic Services (VTS) (SOLAS V/11.7 SOLAS V/12.4 (VTS)).
9. Vessels shall comply with local navigation restrictions and any mandatory ships' routeing systems adopted by IMO in accordance with SOLAS chapter V, regulation 10.7. Other IMO-

adopted routing measures and areas to be avoided designated under IMO and HELCOM frameworks shall be taken into account as appropriate for safe navigation.

SOLAS V/10.7: 7 A ship shall use a mandatory ships' routeing system adopted by the Organization as required for its category or cargo carried and in accordance with the relevant provisions in force unless there are compelling reasons not to use a particular ships' routeing system. Any such reason shall be recorded in the ship's log.

10. Vessels must report incident involving discharges of oil and other harmful substances as required by international and national rules. (MARPOL art. 8 and Protocol I, International Convention on Oil Pollution Preparedness, Response and Co-operation 1990, art. 4, Protocol on Preparedness, Response and Co-operation to pollution Incidents by Hazardous and Noxious Substances 2000, art. 3).
11. Vessels shall carry on board shipboard oil and marine pollution emergency plans as required by the MARPOL Convention (Annex I Reg. 37, Annex II, Reg. 17).
12. Vessels shall carry onboard flag approved ship-to-ship operations plans according to MARPOL Convention Annex I Reg. 41.
13. Vessels shall not conduct ship-to-ship transfers without sufficient and timely notification to the coastal state in whose exclusive economic zone the transfer is to take place (MARPOL Annex I, Reg. 42).

The Coastal States of the Baltic Sea and the North Sea with Iceland:

Belgium
Denmark
Estonia
Finland
France
Germany
Iceland
Latvia
Lithuania
the Netherlands
Norway
Poland
Sweden
the United Kingdom