

LP 04/2025 Penalties for Expired Ship Sanitation Certificates in Turkish

Ports and Straits

The Association has recently received a circular from our correspondent Vitsan, Istanbul, highlighting penalties imposed by Turkish authorities on vessels with expired Ship Sanitary Control Exemption Certificates (SSCEC). This article is prepared based on the circular to recommend Members on compliance with sanitary regulations to avoid operational delays and financial penalties.

I. SSCEC

The SSCEC is issued as evidence that no public risk is found on board and the competent authority is satisfied that the ship is free from infection and contamination including vectors and reservoirs.

Ship Sanitary Certificates (SSC) is a critical document certifying that the ship is free of infection sources and is often required for port entry. In this respect, International Health Regulations (IHR) has published a list of authorized ports all around the world which are capable to give SSC and extensions.

- **Validity:** 6 months from issuance, extendable by **1 month** if inspection/control measures cannot be performed at a port.
- **Extension Rules:**
 - Must be applied for **30 days before expiry**.
 - Cannot be extended for longer than **30 days post expiry**.
- Non-compliance may lead to quarantine, disinfection, or isolation under the *IHR*.

II. International Health Regulations (IHR)

The IHR provides a legal framework for managing cross-border public health risks. It is legally-binding on 196 countries, including the 194 WHO Member States. The IHR grew out of the response to deadly epidemics that once overran Europe. They create rights and obligations for countries, including the requirement to report public health events. The Regulations also outline the criteria to determine whether or not a particular event constitutes a “public health emergency of international concern”.

At the same time, the IHR requires countries to designate a National IHR Focal Point for communications with WHO, to establish and maintain core capacities for surveillance and response, including at designated points of entry. Additional provisions address the areas of international travel and transport such as the health documents required for international traffic.

Finally, the IHR introduces important safeguards to protect the rights of travellers and other persons in relation to the treatment of personal data, informed consent and non-discrimination in the application of health measures under the Regulations.

III. Penalties by Turkish Health Authorities

Vessels arriving in Turkish ports/straits with expired certificates or improper extensions face penalties:

- **Fine Formula (2025):** $TL\ 17.27 \times \text{vessel's net tonnage}$.
- **Payment:** Due within 15 days of penalty notice (25% discount if paid promptly).
- **Appeals:** Must be filed within 15 days; fine must still be paid (with 25% discount) during appeal.
- **Consequences:** Detention until payment, delays in port entry/departure, and potential denial of entry until a new certificate is issued.

IV. Sanitary Inspection Rules for Turkish Straits Transit

- Vessels transiting the Turkish Straits must undergo health inspections per the *1936 Montreux Convention* and local maritime regulations.
- **Required Actions:**
 - Preserve **VDR, ECDIS, logbooks**, and VHF records as evidence of compliance.
 - Follow the **Quebec/Yellow flag rules** until health checks are completed.
- Non-compliance may result in fines based on net tonnage.

V. Advice to Members

- **For Members:**
 - Systematically monitor SSCEC validity and renew/extend certificates at authorized ports *before expiry*.
 - Follow pre-arrival checklists, port guides, and agent instructions for declarations and compliance.

- **For Masters:**
 - Ensure accurate documentation (e.g., customs, health certificates).
 - Retain all records (VDR, logs) to defend against allegations.

For more information, please contact Managers of the Association.