



MCIB

Marine Casualty Investigation Board
Bord Imscrúdú Taisní Muirí

INVESTIGATION INTO AN
INCIDENT INVOLVING THE
GROUNDING OF THE VESSEL
'MV ALTA'

AT BALLYANDREEN BAY,
BALLYCOTTON, CO. CORK

16 FEBRUARY 2020

REPORT NO. MCIB/299
(No.1 OF 2021)

The Marine Casualty Investigation Board (MCIB) examines and investigates all types of marine casualties to, or on board, Irish registered vessels worldwide and other vessels in Irish territorial waters and inland waterways.

The MCIB objective in investigating a marine casualty is to determine its circumstances and its causes with a view to making recommendations to the Minister of Transport - for the avoidance of similar marine casualties in the future, thereby improving the safety of life at sea and inland waterways.

The MCIB is a non-prosecutorial body. We do not enforce laws or carry out prosecutions. It is not the purpose of an investigation carried out by the MCIB to apportion blame or fault.

The legislative framework for the operation of the MCIB, the reporting and investigating of marine casualties and the powers of MCIB investigators is set out in the Merchant Shipping (Investigation of Marine Casualties) Act, 2000.

In carrying out its functions the MCIB complies with the provisions of the International Maritime Organisation's Casualty Investigation Code and EU Directive 2009/18/EC governing the investigation of accidents in the maritime transport sector.



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The Marine Casualty Investigation Board was established on the 25th March 2003 under the Merchant Shipping (Investigation of Marine Casualties) Act, 2000.

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Glossary of Abbreviations and Acronyms

AIS	Automatic Identification System
CSR	Continuous Synopsis Record
Cork CC	Cork County Council
DAFM	Department of Agriculture Food and the Marine
DoT	Department of Transport
EEZ	Exclusive Economic Zone
EMSA	European Maritime Safety Agency
EPA	Environmental Protection Agency
ETA	Estimated Time of Arrival
EU	European Union
FMC	Fisheries Monitoring Centre
GT	Gross Tonnage ^{*Note 1}
HMS	Her Majesty's Ship
IMA	Irish Maritime Administration
IMO	International Maritime Organisation
INS	Irish Naval Service
IRCG	Irish Coast Guard
ISM	International Safety Management
LRIT	Long Range Identification and Tracking
LOA	Length Overall
MARPOL	International Convention for the Prevention of Pollution from Ships
MCIB	Marine Casualty Investigation Board
MoP	Member of the Public
MRCC	Marine Rescue Coordination Centre
MRSC	Marine Rescue Sub-Centre
MSO	Marine Survey Office
MSS	Maritime Support Service
MV	Motor Vessel
RCC	Rescue Co-ordination Centre
SFLA	Sea Fish Licensing Authority
UK	United Kingdom
US	United States
USCG	United States Coast Guard
WNWS	Worldwide Navigational Warning Service

Kilometres	km
Kilowatts	kW
Litres	(lts)
Metres	m
Nautical miles	NM
Tonnes	t

*Note 1: Gross Tonnage is a nonlinear measure of a ship's overall internal volume. In the regulations which govern the measurement of ships the 'tonnage' measurement is one of capacity, the unit of one ton being a capacity measurement of 100 feet cubed (ft³). Gross Tonnage should not be confused with measures of mass or weight such as deadweight tonnage or displacement.

Gross Tonnage is calculated based on "the moulded volume of all enclosed spaces of the ship" and is the total internal capacity of a ship measured from the top of the floors or ceiling to the tonnage deck including the fore and aft peak tanks above the floors. Gross Tonnage is used to determine issues such as a ship's manning regulations, safety rules, registration fees and port dues.

Gross tonnage is defined by the International Convention on Tonnage Measurement of Ships, 1969, adopted by the International Maritime Organization in 1969, and came into force on 18 July 1982.

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Produced 26th February 2021.

1. SUMMARY

- 1.1 Motor Vessel '*MV Alta*' is a merchant ship built in 1976. The crew were stranded onboard after the ship was rendered irreparably disabled on a voyage from Greece to Haiti. '*MV Alta*' was abandoned by the crew and left adrift in October 2018 after a US Coast Guard relief operation rescued the crew of 10 approximately 1,400 miles south-east of Bermuda. On 3 September 2019, the UK's Royal Navy '*HMS Protector*' sighted the '*MV Alta*', derelict in the middle of the Atlantic Ocean. The derelict drifted eastward and finally came ashore on 16 February 2020 in Ballyandreen Bay and grounded on the shore near Ballycotton, County Cork, Ireland.

2. FACTUAL INFORMATION

2.1 Vessel Details:

Name of Vessel:	'Alta' (since 1 September 2017).
Port of Registry:	None.
Type:	General Cargo Ship (during 1976).
Launched:	1976.
Identification:	IMO Number 7432305.
Gross Tonnage:	2295 Tonnes (t) (since 1 July 1994).
Length:	77.32 metres (m).
Deadweight:	1640 t capacity.
Flag:	Tanzania (since 1 November 2017).
Status of Ship:	Total Loss (since 19 September 2018).
Last Update:	25 February 2020.

See Appendix 7.1 Photograph No.1 - 'MV Alta' aground in Ballyandreen Bay, Co. Cork.

See Appendix 7.2 Details of Tanzania Vessel Registration.

2.2 Vessel History:

1976:	Built and named ' <i>Tananger</i> '. Port of Registry: Bergen, Norway. Owner: A/S Tananger.
February 1990:	Renamed ' <i>Pomor Murman</i> '. Port of Registry: Tromso, Norway. Owner: K/S Murman.
January 1994:	Renamed ' <i>Polar Trader</i> '. Port of Registry: Tromso, Norway. Owner: K/S Murman.
December 1996:	Sold to Seakon Shipping A/S.

- October 1997: Sold to Team Ship A/S.
- November 1999: Reregistered.
Port of Registry: Valletta, Malta.
- August 2000: Renamed '*Avantis II*'.
Port of Registry: Piraeus, Greece.
Owner: Nileys Maritime Corp.
- February 2002: Renamed '*Avantis I*'.
Port of Registry: Athens, Greece.
Owner: Hiliadou Maritime - Chalkis, Greece.
- November 2010: Renamed '*Elias*'.
Port of Registry: Panama.
Owner: BTG Shipping Corp.
- November 2017: Renamed '*Alta*'.
Port of Registry: Zanzibar, Tanzania.
Owner: Alta Sg LLC.
- December 2018: Ship was deleted from the ship register of Tanzania.

2.3 Intended Voyage Particulars:

Departure: Greece September 2018.

Intended arrival: Haiti 27 September 2018.

2.4 Type of Casualty:

The derelict vessel came ashore on the coast near Ballycotton, County Cork.

Injuries: There were no reported injuries to persons involved.

Fatalities: There were no fatalities.

Pollution: The main fuel tanks were found empty and open to the sea. It was reported at the time of the grounding that there may have been a likelihood of oil pollution at the time '*MV Alta*' came ashore. The resultant pollution was assumed to have been dispersed by the weather of Storm Dennis.

3. NARRATIVE

- 3.1 'MV *Alta*' departed Greece in September 2018 bound for Haiti in the Caribbean. The ship was due to arrive by 27 September 2018. On 19 September, during the voyage, the vessel suffered a main engine failure which the crew were unable to repair. On 1 October 2018, when the ship was adrift in position 24° 13' N 043° 48' W approximately 1,380 miles southeast of Bermuda, the crew requested assistance. Bermuda Maritime Operations Centre, Rescue Co-ordination Centre, (RCC Bermuda), co-ordinated the incident. Attempts by the vessel owners to hire and dispatch tugs from Venezuela, Guyana, and Bahamas were unsuccessful. The ship's crew reported that their supplies were low, and a United States Coast Guard (USCG) aeroplane dropped one week's provision of food on 2 October. The ship's owners ashore continued negotiations to arrange tug assistance. The USCG Cutter '*Confidence*' arrived on scene to the ship on Monday 8 October and offered assistance to the vessel's crew. With the onset of Tropical Storm Leslie, a decision was made for all crew to abandon the vessel. There were no reported injuries onboard. 'MV *Alta*' was left adrift and derelict in the Atlantic Ocean and the ship's crew were brought ashore and repatriated.
- 3.2 On 3 September 2019, 'MV *Alta*' was sighted by the crew of the UK's Royal Navy Ice Patrol Ship, '*HMS Protector*', which was en route to assist in Hurricane Dorian relief efforts. '*HMS Protector*' reported that there were no people onboard and the vessel appeared to be derelict for some time. They did not share their position at this time.
- 3.3 The vessel continued drifting across the North Atlantic influenced by the Gulf Stream, until it entered European waters and came ashore on the coast of Ireland. On 16 February 2020, during Storm Dennis, members of the public (MoP) alerted the Irish Coast Guard (IRCG) Marine Rescue Co-ordination Centre, Valentia (MRCC Valentia) when the ship was sighted ashore on the rocks at Ballyandreen Bay, position 51°48.98'N 008°02.86'W.
- See Appendix 7.1 Photograph No.1 'MV *Alta*' aground in Ballyandreen Bay, Co. Cork.
- 3.4 A Receiver of Wrecks has been appointed by the Irish Revenue in accordance with the Merchant Shipping (Salvage & Wreck) Act, 1993.
- 3.5 RCC Bermuda reported that at the time of abandonment the vessel had approximately 86 cubic meters of marine gas oil onboard. Contractors on behalf of Cork County Council (Cork CC) boarded the vessel to ascertain the pollution risks. The contractors found the main fuel tanks empty and open to the sea. It is highly likely that any fuel was lost and was dispersed by the storm when the vessel grounded. The vessel had a number of barrels of oil and various gas cylinders on deck. The oil was transferred into new empty

barrels. The main engine and auxiliary engine sumps and the hydraulic storage tanks were also emptied into barrels for removal. Hoses connected to the main hydraulic system were cut and the oil drained into barrels. The engine room bilges were pumped into empty barrels and an absorbent boom was placed in the bilge space to catch any residual oils. All the collected oil barrels were airlifted off the vessel on 26 February 2020. Cork CC continues to assess the wreck for emerging environmental risks.

3.6 The involvement of the MCIB in the wreck of ‘MV Alta’ relates to pollution coming from a vessel as a result of an accident, as per the definition of a marine casualty: “marine casualty” means an event or process which causes or poses the threat of (a) death or serious injury to a person; (b) the loss of a person overboard; (c) significant loss or stranding of, or damage to, or collision with, a vessel or property; or (d) significant damage to the environment. The regulation of pollution coming from a vessel such as air emissions, oily discharges, sewage, waste etc, is regulated by the International Maritime Organisation (IMO) in its International Convention for the Prevention of Pollution from Ships (MARPOL) and associated European Union (EU) and national legislation. This is regulated by the Department of Transport (DoT) and the Marine Survey Office (MSO). It is not regulated by the Environmental Protection Agency (EPA). The EPA regulate all other forms of pollution in the marine/maritime environment and pollution in the water column itself. The IRCG is responsible for cleaning-up or co-ordinating the clean-up after a spill, whether ship sourced or not.^{Note 2}

3.7 From the ships recorded position of abandonment, the ‘MV Alta’ drifted for 496 days over a distance of 2,300 nautical miles (NM) to its current position in Ballyandreen Bay. The vessels exact position and distance travelled during this time is unknown and unrecorded and can only be estimated.

See Appendix 7.3 Chart of Distance Travelled.

Although the track of the vessel was circuitous, an estimate of the daily average distance travelled was 4.63 NM per day towards the Irish coast. Ireland’s territorial waters extend to 200 NM from its territorial sea baselines. In theory the vessel may have spent approximately 43 days in Irish territorial waters without being reported.

See Appendix 7.4 Ireland’s Zone of Responsibility - In this case the Exclusive Economic Zone (EEZ).

3.8 ‘MV Alta’ was registered under a series of registers as detailed in paragraph 2.2. The most recent flag state for the ship was Tanzania. Tanzania has confirmed that the ship was removed from its Register and Classification Society “VEGA” in

Note 2 : Reference ‘National Oil Spill Contingency Plan’ published 27th June 2020:
<https://www.gov.ie/en/publication/79e5d-national-maritime-oilhns-spill-contingency-plan-nmoscp/>

2018 (see Appendix 7.2 Details of Tanzania Vessel Registration). The owner at that time, Alta Shipping LLC of Miami, failed to renew the flag certification which expired on 25 September 2018 some 2 days before the voyage should have concluded on 27 September 2018. It was therefore not registered for the entire voyage to the time it was abandoned on 8 October 2018. MCIB understand that Tanzania has since temporarily closed its maritime registry to foreign vessels while it reviews the status of all ships flying its flag.

4. ANALYSIS

- 4.1 The vessel was abandoned and adrift in the Gulf Stream (see Appendix 7.5 Currents and Winds in the North Atlantic Ocean - Figure 1 - Gulf Stream). Being abandoned and adrift, the vessel was a derelict by virtue of definition. Derelict vessels, on the high seas, are a danger to navigation to other vessels, particularly during times of restricted visibility. The Gulf Stream influenced the derelict's meanderings across the seas, initially northwards along the eastern seaboard of the United States of America and then westwards as its meandering direction became influenced by the mid latitude westerly winds.

See Appendix 7.5 Currents and Winds in the North Atlantic Ocean - Figure 2 - Atlantic Trade Winds.

The combination of dynamic influences of the Gulf Stream currents and the mid latitude westerly winds pushed the derelict towards Europe and the seas off Ireland.

- 4.2 The purpose of this MCIB investigation is to consider the risks to Ireland from the abandoned vessel and not to assess the liability or otherwise arising from its abandonment or issues relating to registration and ownership. Risks to Ireland include:
- Litigation as to ownership.
 - Danger to other vessels of safe navigation posed by a derelict.
 - Environmental impact.
 - Impact of financial ramifications to the State.

4.3 Ownership

Ship registration refers to the process of documenting a ship's given nationality. The country to which a ship is registered is called its "flag state". A ship is bound by the laws of its flag state. A ship's flag state exercises regulatory control over the vessel and is required by international agreements to inspect the vessel regularly, certify the ship's equipment and crew, and issue safety and environmental protection documents and certificates. Part of the active certification of a vessel involves regular surveys by representatives of the flag state to ensure the vessel is maintained, that the crew are qualified and that measures are in place to effect repairs, such as maintenance plans and minimum spare parts lists. Should a vessel suffer a breakdown and the crew are unable to make repairs, then the owner's representatives should have in place contingency plans to aid the vessel's crew. These plans are audited as part of the ISM certification process. 'MV *Alta*' changed registry and ownership several times. The vessel was deleted from the Classification Society Register and was finally deleted from the register of Tanzania in 2018, after it was abandoned. Thus, the ship was abandoned and set adrift as a stateless ship and its ownership

is unknown at this juncture. *'MV Alta'* is now a wreck having drifted ashore and stranded on the shore near Ballycotton, County Cork.

- 4.4 The 2007 Nairobi International Convention on the removal of wrecks provides a sound legal basis for coastal States to remove, or have removed, from their coastlines:
- Wrecks which pose a hazard to the safety of navigation.
 - Wrecks which pose a threat to the marine and coastal environments.
 - Or both the above.

The Convention makes shipowners financially liable and requires them to take out insurance or provide other financial security to cover the costs of wreck removal. It also provides states with a right of direct action against insurers. Ownership of *'MV Alta'* is unknown and the vessel insurers (if any) are not known. The risk of litigation regarding vessel ownership is therefore considered low. The State is empowered through the 2007 Nairobi Convention to remove the wreck of *'MV Alta'*.

4.5 Safe Navigation

'MV Alta' was a derelict drifting in navigable waters off the coast of Ireland in the State's territorial seas. The ship had no means for advertising its presence to other ships in the vicinity other than by being seen visually by observers on the other ships. Apart from being visibly seen by human observation, merchant ships are normally visible, electronically, to other vessels and the coastal state authorities by the following ways and means:

- 4.5.1 Automatic Identification System (AIS). All merchant ships are required to be fitted with an AIS transponder and receiver. This is a VHF based system which broadcasts information from the ship to be received by surrounding ships in the area. AIS can also be received by satellites and can be referred to as satellite S-AIS. This can then be relayed to shore stations or other receivers. Therefore, even for ships located far from the coast, AIS can still locate them through using satellites. A ship requires active electrical power onboard to power the identification system, therefore, in cases of a derelict, such as the *'MV Alta'*, where the ship has no operating electrical power systems the AIS would not be operating.
- 4.5.2 Long Range Identification and Tracking (LRIT). The main purpose of LRIT ship position reports is to enable a Contracting Government to acquire a ship's identity and location information within a sufficient time range to evaluate any security risks posed by a ship off its coast. All registered merchant ships are required to be fitted with LRIT. LRIT is a satellite-based system and is managed by the flag state of the ship. The ship also requires active systems onboard enabling LRIT to operate. In this case the ship was stateless, abandoned, and unpowered. Therefore, coastal states, such as Ireland, were not able to acquire

the ships position or identity as it approached Irish waters. ‘*MV Alta*’ was derelict and abandoned with no active systems onboard enabling LRIT.

- 4.5.3 All merchant ships, fishing vessels and some larger recreational craft are fitted with radar. Thus, they would be capable of locating floating objects when within range. It is assumed that this is what occurred when the ‘*HMS Protector*’ found the vessel. There is no record of the sighting by any other vessels, or any reports being referred to Irish authorities such as the IRCG or the MSO. Therefore, no navigation warnings were issued although the vessel represented a real danger to navigation at that time.
- 4.5.4 Ireland does not have a network of shore-based radar installations scanning the open coastal seas. Therefore, the ship could not be detected by a shore based radar system operating from Ireland.
- 4.6 The Irish Coast Guard, IRCG, maintains three radio stations in Ireland. These stations are in Dublin, Malin Head, County Donegal, and Valentia, County Kerry. These stations are continually operated on a 24-hour basis enabling emergency responses and coordination for maritime incidents offshore in addition to direct ship/shore, shore/ship marine communications and monitoring of same. ‘*MV Alta*’ was not active on the radio communications frequencies and any sightings of the derelict by other vessels were not reported or made known to the IRCG.
- 4.7 The Irish Naval Service (INS) is the maritime element of the Defence Forces. In addition to its primary role, ships of the Irish Naval Service carry out fishery protection patrols in the Irish sector of responsibility in the EU’s Exclusive Economic Zone (EEZ). During normal operations, the Irish Navy may be expected to have three ships at sea at any time patrolling an area several times larger than the island of Ireland. In support of its fishery protection task, the INS operate a land based Fishery Monitoring Centre (FMC) at the Naval Base, Haulbowline, County Cork. This centre is continually manned and operational on a 24-hour basis. The primary task of FMC is to monitor fishing activities in Irish and EU waters and use the information and data gained to focus the patrol activities of its ships when on fishery protection taskings. When specifically required, the FMC is capable of monitoring ship movements in Irish waters if the ships in question are fitted with active LRIT and/or AIS. The presence of ‘*MV Alta*’ whilst in EU or Irish waters was not reported by other vessels. The ship was not visually sighted by a naval patrol, and as the derelict was not fitted with active LRIT or AIS systems it would not appear on FMC monitoring equipment.
- 4.8 Other earth observation services such as the European Maritime Safety Agency, (EMSA) ‘CleanSeaNet’ and ‘Copernicus Maritime Surveillance’ services routinely collect satellite imagery over the oceans. However, imagery resolution data from the satellite is insufficient to randomly scan the sea surface to detect and identify a derelict. The satellites with high enough resolution only make images

on demand or of particular areas. Earth Observation Services are not enabled for detection of derelicts such as the *'MV Alta'*.

- 4.9 EMSA also provides support to the Member States and to EU institutions by maintaining an operational Maritime Support Service (MSS), and provides, on request, a range of systems to Member States in facilitating identification and tracking of ships. However, the EMSA systems are based on AIS, LRIT and S-AIS. *'MV Alta'* was not fitted with active LRIT or AIS systems and would not appear on EMSA MSS systems.

During the period when the derelict *'MV Alta'* was adrift, unidentified and without an electronic signature, the ship posed a significant navigation hazard to commercial and recreational vessels in its vicinity. The only safeguard these vessels had was a reliance on their onboard radar systems and the diligence of the bridge and wheelhouse watchkeepers in keeping a good look out, particularly at times of reduced visibility.

4.10 Environmental Impact

Wrecks, when lying in a fairway and in water of not sufficient depth to allow vessels to pass without striking, may pose a danger to safe navigation to other vessels. In the vessels present position, the *'MV Alta'* is a wreck and poses no danger to other ships. However, in its present position, the vessel has a potential risk over time of environmental impact due to decomposition of its materials of construction (metals and plastics), leakages of manufactured fluids (oils and lubricants) and subsequent pollution of the environment.

- 4.10.1 The regulation of pollution coming from a vessel such as air emissions, oily discharges, sewage, waste etc. is regulated by the IMO MARPOL Convention and associated European and National legislation. In the case of Ireland, MARPOL classified pollution is regulated by the DoT and the MSO but not the EPA. The EPA regulates all other forms of pollution in the marine/maritime environment and pollution in the water column itself.
- 4.11 The IRCG is responsible for cleaning-up or co-ordinating the clean-up after a spill whether ship-sourced or not (see Note 2).

In its present position stranded ashore near Ballycotton, the wreck has a visual impact to the casual observer due to its location and appearance. The wreck lies on a known tourist route (The Wild Atlantic Way) and while the wreck remains an identifiable ship and an object of curiosity, as time passes the wreck, if not removed, will inevitably deteriorate to an unsightly collection of rusting plates and plastic wreckage. The *'MV Alta'* poses a potential for environmental pollution, both materially and visually.

5. CONCLUSIONS

- 5.1 The ‘*MV Alta*’ suffered a mechanical breakdown and was abandoned and set adrift by its owners and crew in October 2018. During the following 16 months the derelict drifted eastwards across the Atlantic Ocean, presenting a danger to safe navigation for all other vessels and offshore fixed installations in its vicinity and a danger of injury or death to their crews and operators. As the derelict drifted into EU waters and the territorial seas of Ireland the responsibility for responding to a maritime incident caused by collision with the derelict ship rested with Ireland and its maritime search and rescue agencies.
- 5.2 ‘*MV Alta*’ grounded on the coast of Ireland. The likelihood of pollution as the wreck breaks up is high and will remain so until the wreck is removed. The costs of removal will likely be borne by the State. The monitoring and tracking of ships and vessels offshore is achieved by means of AIS, and/or LRIT electronic systems activated onboard the individual ships. These electronic systems require electrical supplies onboard the tracked ship. These electronic systems are ineffective in situations involving derelict ships such as the ‘*MV Alta*’ as they have no electrical power source onboard.

6. SAFETY RECOMMENDATIONS

- 6.1 The Minister for Transport should, together with the Minister for Defence and the Minister for Agriculture, Food and the Marine, form a working group comprising members from the Irish Coast Guard, the Naval Service, Irish Lights, the Sea Fisheries Protection Authority and other interested parties. The working group should explore the risks and potential costs to the State presented by derelict ships entering Irish territorial waters and coming ashore in Ireland and make proposals for means to identify, monitor, track and interdict derelict ships before they endanger other ships and seafarers in the vicinity. The working group should be also aware of the EU dimension and be prepared to make recommendations to other European agencies including EMSA on their deliberations.

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Appendix 7.1 Photographs



Photograph No.1 - 'MV Alta' aground in Ballyandreen Bay, Co. Cork.

Appendix 7.2 Details of Tanzania Vessel Registration

**ZANZIBAR MARITIME AUTHORITY**

PHONE NO: +255 24 2236795
FAX NA NO: +255 024 2236796
WEBSITE: www.zma.go.tz
EMAIL: info@zma.go.tz

P.O.BOX 401
ZANZIBAR

ZMA /RSZ/1/VOL.10/153

21/04/2020

**Director General,
Tanzania Shipping Agencies Corporation
P. O.Box 999, Dar-es-Salaam
Tanzania.**

RE: GHOST SHIP MV ALTA WITH TANZANIA FLAG UP ON IRISH SEASHORE

Reference is made to your letter with Ref. No. CAB 23/216/01/3 dated 21st February 2020 regarding the above-mentioned subject.

We would like to inform you that the vessel ALTA was registered to our Administration on 20th September 2017 and it had a permanent registration until 2022. However the ship was terminated from our registry on 27th December, 2018 following the failure of the owner to renew her flag certificates that expired 25th September, 2018 and suspension of Class and Statutory Certificates by its RO, Vega Register of Shipping on 17th December, 2018.

In this regard, the vessel ALTA is no longer a Tanzanian ship and she does not deserve to sail with Tanzanian flag. The ship is owned by ALTA SHIPPING LLC of Miami USA and her contact details are as follows:

ALTA SHIPPING LLC,
21427 NW 13TH CT. SUITE 214 - MIAMI, FL 33169 - USA,
Phone, +1 (786) 564-7655

Please find attached copies of flag certificates, termination letter of registry, Class and Statutory suspension letter.

Thank you,

**REGISTRAR OF SHIPS
ZANZIBAR MARITIME AUTHORITY**

Appendix 7.2 Details of Tanzania Vessel Registration



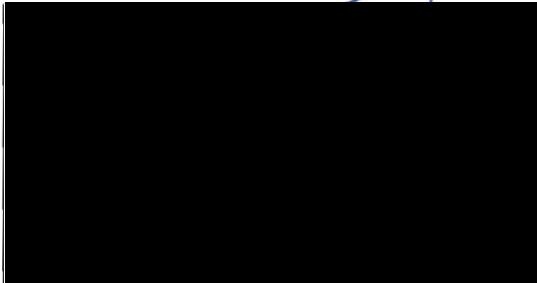
Date: 17.12.2018
Page: 1 / 1

LETTER OF SUSPENSION

To: WHOM IT MAY CONCERN
Subject: ALTA IMO NO. 7432305

Here, We VEGA REGISTER Inc. confirm that suspend of Class certificates of MV ALTA on 17 December 2018.

Best Regards,



Appendix 7.2 Details of Tanzania Vessel Registration



ZANZIBAR MARITIME AUTHORITY

TEL. NO: +255 24 2236795
FAX NO: +255 24 2236796
WEBSITE: www.zma.go.tz
E-MAIL: info@zma.go.tz

P.O. BOX 401
ZANZIBAR
TANZANIA

ZMA/RSZ/1/Vol.10/48

27th December , 2018

ALTA SHIPPING LLC.
21427 NW 13TH CT. SUITE 214 – MIAMI, FL 33169 – USA,
Phone, +1 (786) 564-7655

**REF: TERMINATION OF REGISTRATION OF THE VESSEL MV ALTA
IMO NO. 7432305**

Reference is made to the above captioned subject.

We would like to inform you that vessel MV ALTA has not renewed its flag certificates since 25 September, 2018 and thus she has been operating with invalid certificates in contrary to our legal requirements.

In this respect, we have struck off your vessels MV IMO NO. 7432305 from the TZIRS registry effective this 27th day of December, 2018. This implies that the ship is neither entitled to fly the Tanzania flag nor to identify herself as Tanzania's ship in its sailing operation.

We expect that you need this act.


For REGISTRAR OF SHIPS
ZANZIBAR MARITIME AUTHORITY.

Appendix 7.3 Chart of Distance Travelled



Appendix 7.4 Ireland's Zone of Responsibility - In this case the Exclusive Economic Zone (EEZ)



Appendix 7.5 Currents and Winds in the North Atlantic Ocean

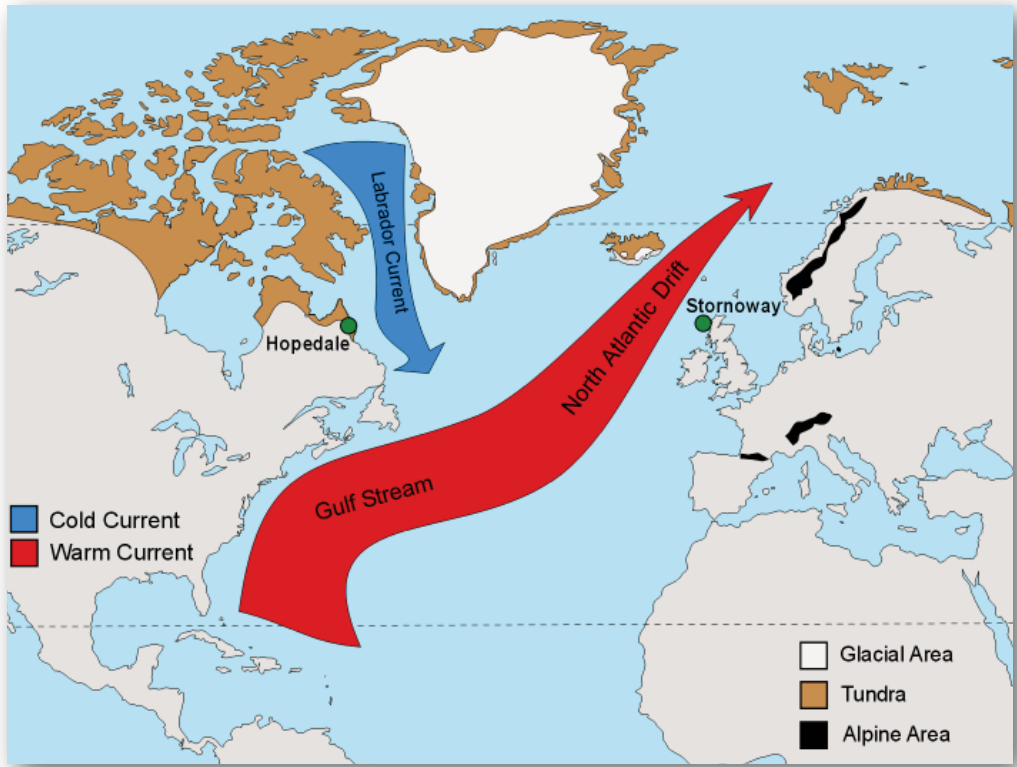


Figure 1 - Gulf Stream.

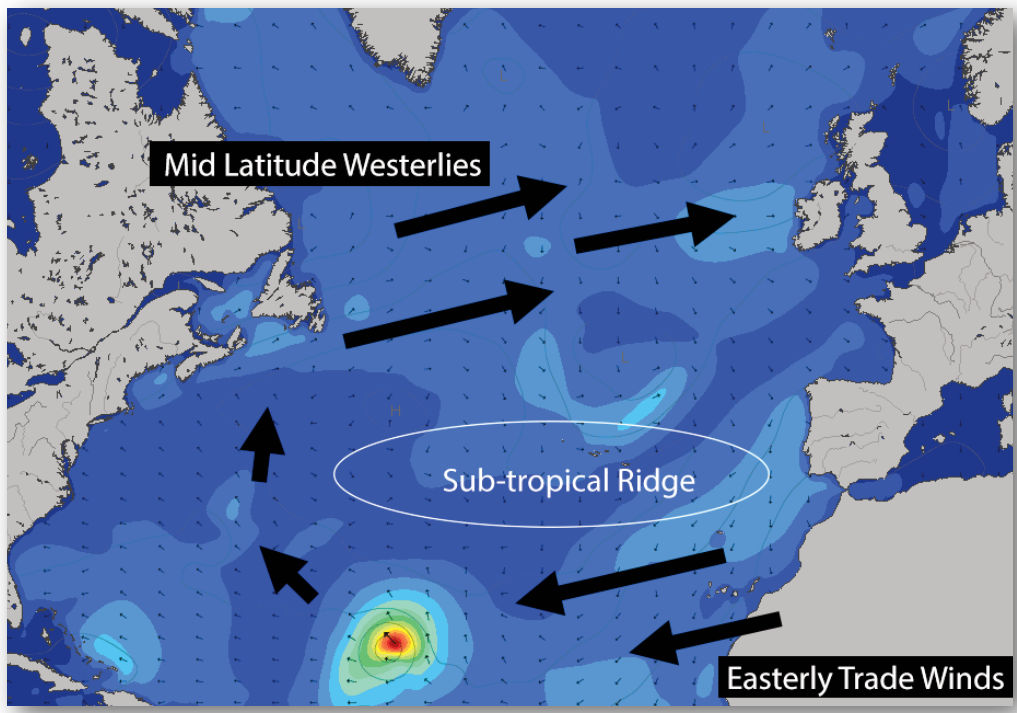


Figure 2 - Atlantic Trade Winds.

SECTION 36 PROCESS

Section 36 of the Merchant Shipping (Investigation of Marine Casualties) Act, 2000

It is a requirement under Section 36 that:

- (1) Before publishing a report, the Board shall send a draft of the report or sections of the draft report to any person who, in its opinion, is likely to be adversely affected by the publishing of the report or sections or, if that person be deceased, then such person as appears to the Board best to represent that person's interest.
- (2) A person to whom the Board sends a draft in accordance with subsection (1) may, within a period of 28 days commencing on the date on which the draft is sent to the person, or such further period not exceeding 28 days, as the Board in its absolute discretion thinks fit, submit to the Board in writing his or her observations on the draft.
- (3) A person to whom a draft has been sent in accordance with subsection (1) may apply to the Board for an extension, in accordance with subsection (2), of the period in which to submit his or her observations on the draft.
- (4) Observations submitted to the Board in accordance with subsection (2) shall be included in an appendix to the published report, unless the person submitting the observations requests in writing that the observations be not published.
- (5) Where observations are submitted to the Board in accordance with subsection (2), the Board may, at its discretion -
 - (a) alter the draft before publication or decide not to do so, or
 - (b) include in the published report such comments on the observations as it thinks fit.'

The Board reviews and considers all observations received whether published or not published in the final report. When the Board considers an observation requires amendments to the report that is stated beside the relevant observation. When the Board is satisfied that the report has adequately addressed the issue in the observation, then the observation is 'Noted' without comment or amendment. The Board may make further amendments or observations in light of the responses under Section 36. 'Noted' does not mean that the Board either agrees or disagrees with the observation.

Response(s) received following circulation of the draft report are included in the following section.

8. SECTION 36 - CORRESPONDENCE RECEIVED

No correspondence was received on the draft of this report.



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