

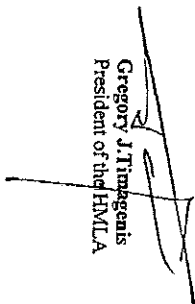
(ii) The FAL Convention 1965 (as amended); and  
(iii) The ILO MLC 2006 Convention?

Yes, they were as the Greek State has ratified and incorporated into national law all the above conventions and regulations as well as the amendments thereto. As above, most of the circulars and the directions were based on the guidelines of the above Regulations and Conventions.

9 (c). Were those making the decisions in your jurisdiction in relation to the Ebola outbreak aware of the potential conflict in the requirements between those Regulations and Conventions?

From the perusal of the relevant regulations, conventions, circulars and directions, we did not notice any potential conflict of which the relevant public authorities were aware.

Piraeus, 15/2/2016

  
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President of the HMLA

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REPLY OF THE HELLENIC MARITIME LAW ASSOCIATION  
TO THE CMI QUESTIONNAIRE  
- PANDEMIC RESPONSE -  
THE EFFECT ON SEAFARERS AND PASSENGERS AT SEA

1. Is your jurisdiction a member of the World Health Organisation?  
Yes: Greece has been a member of the World Health Organisation since 1952.

2. Has your jurisdiction given effect under its domestic law to the International Health Regulations?  
The International Health Regulations were ratified by virtue of law No. 3991/2011 «Ratification of the revised International Health Regulations of the World Health Organization».

3. Has your jurisdiction ratified the IMO-MLC 2006 Convention?  
Yes, it was ratified by virtue of law No. 4078/2012 (published in the Government Gazette A' 179) and entered into force for Greece on 4/1/2014.

4. What steps have been taken within your jurisdiction to give effect to the IMO-MLC 2006 Convention?  
The following Ministerial Decisions and Circulars have been issued to give effect to the IMO-MLC 2006 Convention:

a) Ministerial Decision No. 4113.305/01/213 (published in the Government Gazette B' 1553/2013) «Regulations on the application of the requirements of the Maritime Labour Convention, 2006 of the International Labour Organisation - Flag State and Port Obligations».

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By virtue of the above Ministerial Decision, three Regulations for the application of the Maritime Labour Convention, 2006 were approved and entered into force. Specifically: the Regulation "Maritime Labour Inspectors", the Regulation "Audit and Compliance" and the Regulation "Authorisation of Recognised Organisations".

b) Ministerial Decision No. 3522.2/08/213 (published in the Government Gazette B' 1671/2013) «Regulation on the application of the requirements of the Maritime Labour Convention, 2006 of the International Labour Organisation».

By virtue of the above Ministerial Decision, one Regulation was approved and entered into force for the application of the requirements of Maritime Labour Convention, 2006. This Regulation was divided into the following Chapters: Chapter 1 "Minimum requirements for seafarers to work on a ship", Chapter 2 "Conditions of employment", Chapter 3 "Accommodation, recreational facilities, food and catering", Chapter 4 "Health protection, medical care, welfare and social security protection", Chapter 5 "Compliance and enforcement".

e) Circular No. 3527.1.2/2013 «Application requirements of the Maritime Labour Convention, 2006 of the International Labour Organisation» by virtue of which, the Ministry of Shipping and Island Policy intended to inform the shipowners, as well as any Recognised Organisation and/or Authority, for the basic structure and content of the Maritime Labour Convention, its implementation and requirements e.t.c.

d) Circular No. 4451.2/01/213, code No: MLC/01/2013/02-08-13 «Certification of ships by DEDAPLE (Management Audit Department of Ship and Port Facility Security) pursuant to the provisions of the Maritime Labour Convention, 2006».

By virtue of the above Circular, the Ministry of Shipping and Island Policy intended to inform the shipowners of ships under Greek flag, as well as any Recognised Organisation and/or Authority, for the certification of the ships which are obligated for certification under the Maritime Labour Convention, 2006 and the relevant procedure for obtaining that certification.

State), undertook the implementation of the measures on board the vessels as well as at the entry points of the country and sea passengers' and immigrants' reception centres.

It is also worth pointing out that, pursuant to the Ebola National Response Plan, the University of Thessaly (Faculty of Hygiene & Epidemiology) was set to cooperate with the WHO in relation to the IHR and the country entry points. Furthermore, the Microbiology Laboratory of the Aristotle University of Thessaloniki (Faculty of Medicine) was set as the competent laboratory for the investigation of any suspicious clinical specimen.

9 (e). Were maritime administrations within your jurisdiction consulted in relation to decisions taken within your jurisdiction during the Ebola outbreak?

The State Flag authorities, the Union of Greek Shipowners, the Hellenic Chamber of Shipping and other maritime authorities have been consulted, inter alia, by KEELPNO and have addressed numerous circulars and directions to crew, passengers, port authorities, shipping companies and vessels. Such circulars also advise on all the initiatives, actions and publications of the WHO on the outbreak of the virus as well as on the need for disease preparedness, co-ordination, public awareness, infection prevention, control and response plans.

KEELPNO was also very actively reporting and following up on any indication of Ebola infection. Pursuant to the IHR, a Written Emergency Response Plan must be drafted for every port in the country, which would specifically provide for the appointment of a Co-ordinator and for the duties of the relevant health and port authorities. KEELPNO provided instructions for the preparation of such Emergency Response Plan.

9 (d). Were those who took decisions in your jurisdiction during the Ebola outbreak aware of the requirements of:  
(i) International Health regulations 2005; and

Further to and in the context of the above, a great number of Circulars, Directives and Guidelines have been issued by the relevant authorities, through which all the local authorities down the chain were informed and guided accordingly so as to ensure preparedness. Indicatively, it is worth mentioning the following Circulars issued by the Ministry of Health: (a) No. Υ1/Τ.Π.οκ 69893/08.08.2014 on "Ebola Hemorrhagic Fever - Directions", (b) No. Υ1/Τ.Π.οκ 92962/23.10.2014 on "General Directions - Instructions for the Hemorrhagic Fever Ebola to the Health Units (private and public) of the country" and (c) No. Υ1/Τ.Π.οκ 5662/03.11.2014 on the "Increase of levels of preparedness of the ports of the country for the Hemorrhagic fever Ebola". Additionally, public awareness was raised through the circulation and distribution of informative material by the relevant authorities as well as the media. Other measures include: (a.) Training of the personnel of the authorities responsible for the implementation of the measures taken by the state to respond to the Ebola outbreak, (b.) Activation of a dedicated 24/7 telephone line for recording Ebola incidents, (c.) Creation of a dedicated Ebola portal on the internet intended to train the Public Health personnel participating in the Ebola National Response Plan and (d.) Supporting the infrastructure at the country's entry points, such as the port authorities and airports, passenger and immigrants reception centres etc.

9 (b) Which Department of State or organisation in your jurisdiction was responsible for implementing those measures during the recent Ebola outbreak?

Except for the Ministry of Health and its various Directorates, the KEELPNO, the National Health Operation Centre (ΕΚ.ΕΡ.Υ), the National Committee for Virus Hemorrhagic Fevers, the First Aid National Centre (ΕΚΑΒ), various regional Directorates etc. were set, inter alia, as the designated authorities for the purposes of implementation.

Furthermore, the Ministry of Shipping and its various Directorates, acting as Flag State authorities, the Hellenic Coast Guard and all the Port Authorities of the country (in their capacity as the authorities of the Flag State and / or the Port

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e) Circular No: ΜΛC/02/2013/11-12-13, code No. 4451-2/07/2013 «Certification of the Part II of the Declaration of Maritime Labour Compliance» by virtue of which, the Ministry of Shipping and Island Policy gave instructions and directions for the issuance and certification of the Declaration of Maritime Labour Compliance.

η) Circular \ No: ΜΛC/03/2014/20-01-14, code No. 4451-2/04/2014 «Compliance with the Maritime Labour Convention, 2006, of ships which are not obliged to certification», by virtue of which the shipowners were informed that at their request and upon a voluntary basis, they could achieve the certification of their non - obliged for certification ships under the Maritime Labour Convention, 2006.

5 Has your jurisdiction ratified the IMO Facilitation of Maritime Traffic Convention 1965 (FAL Convention)?

Yes, it was ratified by virtue of legislative Decree No. 1028/1971 (published in the Government Gazette Α' 250) and was entered into force upon the fulfillment of the conditions of the article XI thereof.

The subsequent amendments were ratified by the following legislative acts:

- Presidential Decree No. 1019/1977 «Acceptance of Amendments to Article VII».
- Joint Ministerial Decision No. 1141.16/01/04 «Acceptance of Modifications of the Year 2002 to Annex».

Joint Ministerial Decision No. 3131.Α.16/295/2012 «Acceptance of Modifications of the Years 2005 and 2009 to Annex»

6. What steps have been taken within your jurisdiction to give effect to the FAL Convention?

In view of, inter alia, the complexity of the provisions and obligations arising from the amendments to the FAL Convention, the Greek State, by virtue of related Ministerial Decisions, has constituted Committees of Experts in Legal, Shipping

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and Customs Regulations in order to incorporate into the national legal system the 2002, 2005 and 2009 amendments to the Annex of the FAL Convention, regarding the facilitation of the arrival, stay and departure of ships (eg. by virtue of Ministerial Decision No. 3136.A.16/2010 a Committee was established for the incorporation into the national legal system of the 2005 and 2009 Amendments to the Annex of FAL Convention 1965). Indeed, as per previous question No. 5, such amendments have been duly incorporated into the national legal system.

The Directorate for Ocean-going Shipping of the Ministry of Shipping & Island Policy is the competent designated national authority for all facilitation purposes under the FAL Convention. The Ministry is in close co-operation with the IMO Facilitation Committee in order to broaden the facilitation activities of IMO in Greece and place them on a permanent basis (eg. in relation to the incorporation into the Greek administrative procedures of the Principles adopted by the Facilitation Committee on 22/01/2009 FAL.3/Cir. 194 relating to Administrative Procedures for Disembarking Persons Rescued at Sea). All developments and initiatives for the implementation of the requirements of the International Conventions by the Greek authorities are published on the website of the Hellenic Coast Guard, [www.hcg.gr](http://www.hcg.gr) and on <http://egov.yen.gr>.

**7. Are you aware if your jurisdiction has denied free pratique to a vessel during any of the following pandemics: Avian flu; SARS; Chikungunya or MERS?**

The question was addressed to the Hellenic Coast Guard at the Ministry of Shipping and Island Policy and accordingly it has been certified by virtue of their official response with Reg. No.: 2132.6/39336/2015, that until 20.11.2015 no vessel has been denied free pratique, in the context of prevention of diseases and in particular in relation to the Avian flu or Ebola virus. Furthermore, it has been confirmed to us that all Port Authorities in Greece have been duly provided with all the Circulars and Directions of the Ministry of Health and the other Ministries which have further been responsible for addressing the Ebola virus outbreak, in order to be prepared to act in the context of their duties.

**8. Are you aware if your jurisdiction has taken any steps to establish the care capacities identified in Sections A and B of Annex 1 of the International Health Regulations, and in particular a “national public health emergency response plan” in compliance with the International Health Regulations?**

In compliance with the International Health Regulations (IHR), the Greek Ministry of Health has drafted the National Response Plan for Public Health in 2008. Furthermore, in order to respond to the need for a co-ordinated plan for the prevention of and response to the Ebola virus outbreak, especially with regard to emergencies arising from the spreading of the virus to the local society, the Ministry of Health has drafted the National Response Plan for Ebola Virus in December 2014 (published on the internet on 07.01.2015).

**9. (a). What measures were taken by your jurisdiction during the recent Ebola outbreak?**

In the context of harmonization of Greek law with IHR, the FAL Convention and MLC 2006 Convention, as well as in compliance with the requirements of the national legislation with regard to Public Health, the Greek State has taken legislative initiatives as of the end of 2014 for the purpose of preparing to respond to the Ebola virus outbreak and the possibility of its spreading to the local society, including but not limited to the following:

1. Ministerial Decision No. Γ10/Οικ:96894/05.11.2014 on the “Designation of Hospital Units for the hospitalization of suspicious or confirmed cases of Ebola”
  2. Ministerial Decision No. ΑΙΒ/Γ.Π.Οικ:95509/03.11.2014 on the “Establishment of a National Committee on Virus Hemorrhagic Fever” and its supplements
- Ministerial Decision No. Γ10/Οικ.1088 on the “Plan to respond to Ebola Hemorrhagic Fever “ATHENA”” (Ebola National Response Plan). This was issued and published on the main page of the web site of the Ministry of Health as well as of the Hellenic Centre for Disease Control & Prevention (KEELPNO).