



TUVALU SHIP REGISTRY

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MARINE CIRCULAR

MC-9/2025/1

01/2026

FOR: Ship Owners, Ship Managers, Ship Operators, Ship Masters, P&I Club and Agents of the Owners

SUBJECT: SANCTIONS AND COMPLIANCE REQUIREMENTS (INCLUDING VESSELS CALLING RUSSIA)

DEFINITIONS:

For the purpose of this circular:

- “AIS” – Automatic Identification System
- “EU” – European Union
- “OFAC” – Office of Foreign Assets Control
- “P&I” – Protection and Indemnity providing third-party liability cover for the vessel
- “RO” – Recognized Organization as defined by MSC.349(92) / MEPC.237(65)
- “SOLAS” – International Convention for the Safety of Life at Sea (SOLAS), 1974, as amended.
- “STS” – Ship-to-ship
- “UK” – United Kingdom
- “UN” – United Nations
- “US” – United States of America

The term “Administration” shall mean the Tuvalu Ship Registry.

REFERENCES:

- (a) US sanctions programmes administered by OFAC.
- (b) EU restrictive measures (sanctions).
- (c) UK sanctions regime.
- (d) IMO Resolution A.1192(33) – Prevention of illegal maritime operations by the “Dark Fleet” or “Shadow Fleet”
- (e) MC-5/2025/1 - Requirements for Ship-to-Ship Operations to Prevent Illegal Operations by the “Dark Fleet” or “Shadow Fleet”

PURPOSE:

This circular sets out additional compliance requirements for all Tuvalu-flagged vessels calling at ports in the Russian Federation while the armed conflict between Russia and Ukraine continues and no peace agreement has been concluded.

APPLICATION:

This circular applies to all Tuvalu-flagged vessels:

- (a) calling at, or planning to call at, any port in the Russian Federation, and/or
- (b) participating in STS operations involving Russian ports, Russian anchorages or Russian territorial waters, and/or
- (c) carrying Russia originated cargoes through STS operation

CONTENTS:

1. Sanctioned cargo

- 1.1. Vessels must **not discharge** in any Russian port any cargo that is subject to US, EU, UK or UN sanctions, even if:
 - 1.1.1. The cargo originates from a country that does not sanction Russia; or
 - 1.1.2. The local port State allows or does not prohibit such cargo.
- 1.2. Vessels must **not load** in any Russian port any Russian-origin cargo that is subject to US, EU, UK or UN sanctions, even if the receiving country does not prohibit the import.

2. Sanctioned Vessels, Companies and Beneficial owners

Vessels must not be engaged in any trade where:

- 2.1. the charterer, cargo owner, receiver, shipper, consignee, financing bank, P&I Club, or other key counterparty is **listed**, or **owned/controlled** by a listed party, under UN, US (OFAC), EU or UK sanctions; or
- 2.2. any vessel involved in **STS, lightering or towing, or escort operations** is sanctioned or owned/controlled by sanctioned parties.

3. P&I Cover and Confirmation

- 3.1. All vessels calling at Russian ports must maintain **full, valid P&I cover** for the intended voyage, area, cargo, and operations.
- 3.2. The Administration may require direct written confirmation from the P&I Club that cover is in force and acceptable.

4. AIS / LRIT and “Dark Fleet” Practices

- 4.1. **AIS and LRIT must remain operational at all times**, except as permitted under SOLAS for safety and security.
- 4.2. Practices associated with the **“Dark Fleet” / “Shadow Fleet”** (including AIS disablement, identity spoofing, forged documents, or clandestine STS operations) are strictly prohibited.

5. Responsibility of Owners/Managers

- 5.1. Owners/managers must complete and submit the COMPLIANCE LETTER (template may be downloaded at: <https://www.tvship.com/forms> under MISCELLANEOUS FORMS) to the Administration and strictly adhere to the requirements as declared.
- 5.2. Pre- notification to the Administration

For any voyage involving a call at a Russian port, the owner, ISM Manager (DPA), or agent must notify the Administration at technical@tvship.com **before arrival**, providing:

- 5.2.1. the Russian port(s) and ETA(s);
- 5.2.2. cargo description, quantity, origin and intended discharge/load port;
- 5.2.3. identity of charterer, shipper, consignee, and other counterparties;
- 5.2.4. confirmation that sanctions screening shows no matches on UN / US / EU / UK lists;
- 5.2.5. confirmation that AIS / LRIT will remain operational;
- 5.2.6. confirmation from P&I that cover is valid for the voyage, area and cargo.

5.2.7. Cargo Manifest (only after cargo loading is completed)

5.3. Due Diligence and Recordkeeping

Owners / managers must conduct and document sanctions due-diligence before any Russian call, including:

- 5.3.1. screening of all relevant parties (owners, managers, charterers, cargo interests, banks counterparties) against **UN, US, EU and UK sanctions lists**;
- 5.3.2. verification of **cargo origin, grade and destination**;
- 5.3.3. maintaining onboard and ashore all relevant records (charterparty, bills of lading, invoices, certificates of origin, sanctions screening results, P&I confirmations, etc.);
- 5.3.4. Providing such documents to the Administration upon request and submitting them at the earliest opportunity.

5.4. Master's Responsibility

Owners / managers must ensure that the Master is fully briefed in writing on the requirements of this circular prior to entering Russian ports, and must report any doubts or potential sanction issues to the Administration **before** cargo operations commence.

6. Russian-origin Oil and Petroleum Products – Price Cap Policy

- 6.1. For any voyage involving Russian-origin crude oil or petroleum products, owners/managers must ensure compliance with applicable price cap measures and related sanctions requirements under the US (OFAC) and, as applicable, the EU and UK regimes.
- 6.2. Owners/managers must also ensure that the voyage does not involve any prohibited or unauthorized transactions with sanctioned persons or entities, including (where relevant) Russian energy companies designated by sanctions authorities, and must report any doubt to the Administration before cargo operations commence.

7. STS Operations Involving Russia

All STS operations involving Russian ports, waters, or anchorages must comply with MC-5/2025/1 (reference (e)) and must not involve any sanctioned vessel or cargo.

8. Consequences of Non-Compliance

- 8.1. Any vessel found, or reasonably suspected, to be in breach of this circular, including involvement with sanctioned cargoes, sanctioned parties, or “dark fleet” practices, will be **immediately deregistered. Any other vessels under the same ownership or management will also be deregistered.**
- 8.2. The Administration further reserves the right to notify ROs, P&I Clubs, Port State authorities and other competent authorities of such breaches.

Yours sincerely,

Deputy Registrar
Tuvalu Ship Registry