



Kiribati Ship Registry

Singapore Operations Office:

10 Anson Road #25-14, International Plaza, Singapore 079903

Tel: +65 6225 0555 Email: info@kiribaship.com Website: https://kiribaship.com

MARINE CIRCULAR 11/2025

8 December 2025

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

SUBJECT : VESSELS CALLING AT RUSSIAN PORTS – SANCTIONS AND COMPLIANCE REQUIREMENTS

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-10/2025 - Requirements for Ship-to-Ship Operations to Prevent Illegal Operations by the “Dark Fleet” or “Shadow Fleet”

DEFINITIONS:

For the purpose of this circular:

- “Administration” – Kiribati Ship Registry
- “RO” – Recognized Organization as defined by MSC.349(92) / MEPC.237(65).
- “P&I” – Protection and Indemnity providing third-party liability cover for the vessel.

APPLICATION:

This circular applies to all Kiribati-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.

PURPOSE:

This circular sets out additional compliance requirements for all Kiribati-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.

CONTENTS:

1. Sanctioned cargo – Discharging

Vessels **must not discharge** in any Russian port any cargo that is subject to **US, EU, UK or UN sanctions**, even if:

- 1.1. The cargo originates from a country that does not sanction Russia; or
- 1.2. The local port State allows or does not prohibit such cargo.

2. Sanctioned cargo – Loading

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.

3. Sanctioned Vessels, Companies and Beneficial owners

Vessels **must not be engaged** in any trade where:

- 3.1. 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
- 3.2. any **vessel** involved in **STS, lightering or towing, or escort operations** is sanctioned or owned/controlled by sanctioned parties.

4. P&I Cover and Confirmation

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

5. AIS / LRIT and “Dark Fleet” Practices

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

6. Due Diligence and Recordkeeping

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

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

7. 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@kiribaship.com **before arrival**, providing:

- 7.1. **the Russian** port(s) and ETA(s);
- 7.2. cargo description, quantity, origin and intended discharge/load port;
- 7.3. identity of charterer, shipper, consignee, and other counterparties;
- 7.4. confirmation that sanctions screening shows no matches on UN / US / EU / UK lists;
- 7.5. confirmation that AIS / LRIT will remain operational;
- 7.6. confirmation from P&I that cover is valid for the voyage, area and cargo.
- 7.7. Cargo Manifest (only after cargo loading is completed)

8. STS Operations Involving Russia

All STS operations involving Russian ports, waters, or anchorages must comply with MC-10/2025 (reference (e)) and must not involve any sanctioned vessel or cargo.

9. 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.

10. Consequences of Non-Compliance

- 10.1. 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.**
- 10.2. The Administration reserves the right to notify **ROs, P&I Clubs, Port State authorities and other competent authorities** of such breaches.

Yours sincerely,

Deputy Registrar
Kiribati Ship Registry