

DIRE STRAITS

South Africa Marine Forum

South Africa

May 8, 2026p



MICHELLE WIESE BOCKMANN

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WINDWARD - THE LEADING MARITIME AI™ COMPANY

Fusing multi-sensor maritime data, AI, and analytics into a single pane of glass.

15

Years of Experience
U.S Based Company
Acquired in 2025

40+

**Unclassified Data
Sources and sensors**

Public, commercial and
proprietary

24

U.S. Federal Agencies

Supporting DoW, IC and
DHS since 2019 (7+ year)

300+

Customers

USG, NATO, FIVEYE,
Private Sector,
Academia, Non-Profits



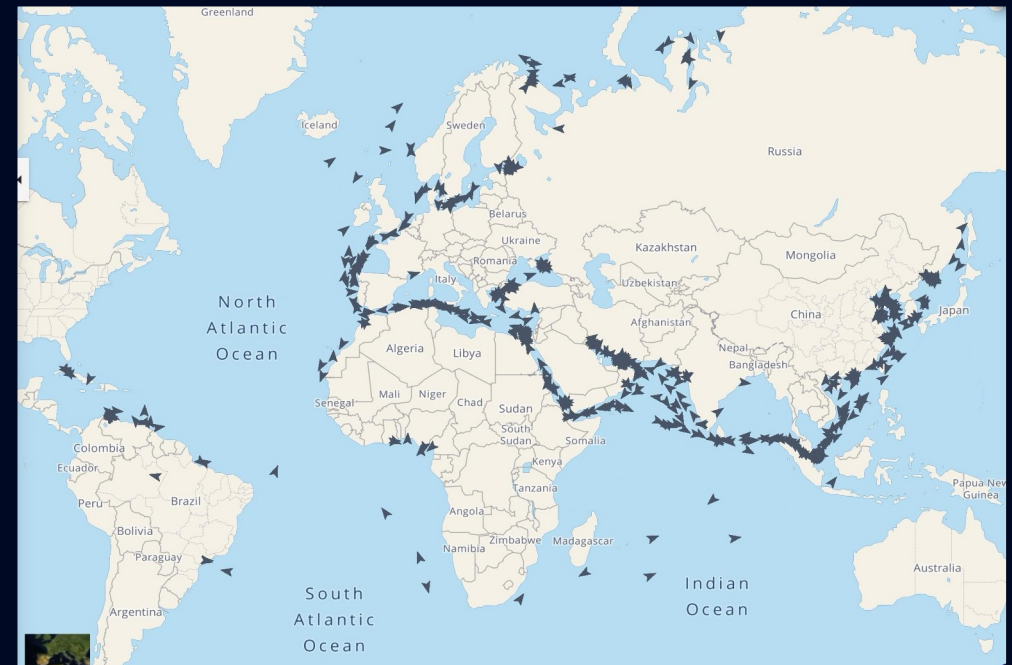
2026 ... UNPRECEDENTED

- + War in the Arabian Gulf, Hormuz closed for a third month, maritime order upended, the dark fleet and shipping at center of geopolitics, greyzone aggression and military conflict.
- + A third US blockade on sanctioned oil shipments (Venezuela, Cuba, Iran)
- + Bifurcated global trade & parallel fleet ~21% crude tanker fleet sanctioned, with average age of 20 years.
- + Divisions between military and commercial shipping blurring.
- + Deceptive shipping practices at all-time highs.
- + Dark fleet business model broken in Venezuela; US and Iran Russia sanctions waivers give dark fleet new life
- + G7 Russia Oil Price Cap – dead in the water?



INTERNATIONAL RULES-BASED ORDER IS CRUMBLING

- + Windward Dark Fleet: ~2000 vessels;
~1200 solely deployed in Iran, Russia
energy commodities
- + Sanctions evasion and circumvention well
entrenched & widespread
- + ~75% dark fleet of crude tankers
sanctioned
- + ~20% internationally trading tanker fleet
operating outside international rules-based
order
- + Dark LNG fleet evolving



DARK FLEET: DEFINITION

- ✓ Carrying out unsafe operations which do not adhere to international regulations and well-established and strict industry standards and best practices
- ✓ Intentionally avoiding flag State and port State control inspections
- ✓ Not maintaining adequate liability insurance or other financial security
- ✓ Intentionally avoiding commercial screenings or inspections
- ✓ Not operating under a transparent corporate governance policy that assures the welfare and safety of those on board and the protection of the marine environment, or;
- ✓ Intentionally taking measures to avoid ship detection such as switching off their AIS or LRIT transmissions or concealing the ship's actual identity when there is no legitimate safety or security concern sufficient to justify such action

* Resolution A.1192 (33) adopted December 6, 2023

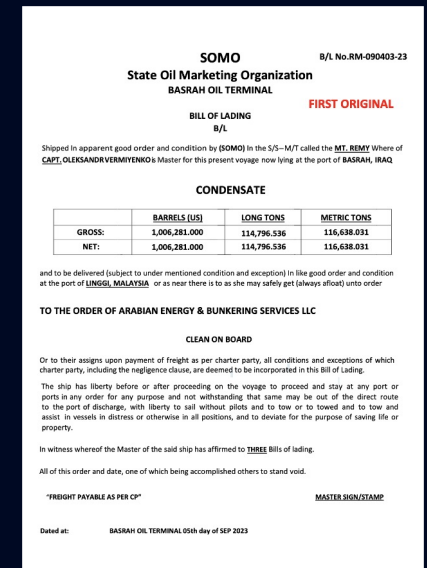
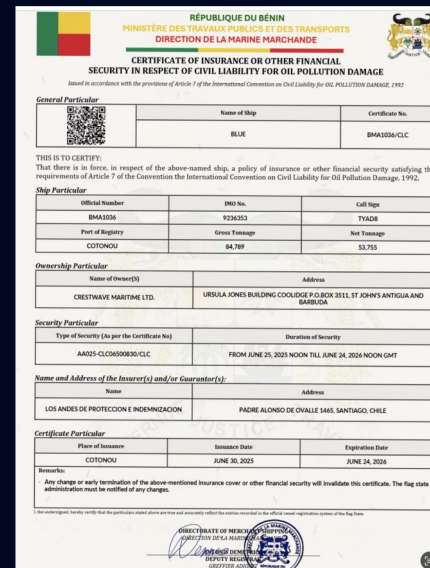
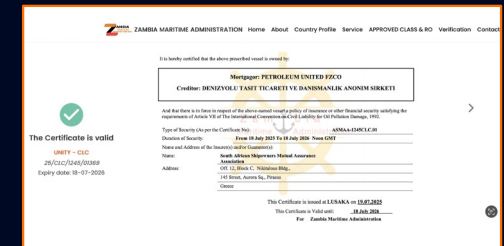
Typology:

- * Solely deployed in sanctions trade
- * Aged over 15 years, poorly maintained, with insurance outside International Group P&I clubs
- * It is anonymously owned and/or has a corporate structure designed to obfuscate beneficial ownership discovery
- * Engages in deceptive shipping practices

MIND THE GAP: DECEPTIVE SHIPPING PRACTICES AT RECORD

Illegitimate and fraudulent shipping practices threaten regulatory integrity of global trade and undermine international rules-based order:

- + Flag-hopping: ~700 tankers changed flags 2-6x in 2025
- + False flags/fraudulent registries
- + Spoofing (GNSS manipulation)
- + GPS jamming
- + Repeated vessel name/ownership changes
- + Zombie ships/Vessel identity fraud
- + Fake and fraudulent documents, BoL, widely used
- + Fake marine insurers/fake recognized organizations
- + STS in international waters



SANCTIONS + FLAG GOVERNANCE CRACKDOWN = FALSELY FLAGGED SHIPS

- + ~20 fraudulent registries: (incl. Aruba, Angola, Benin, Curaçao, Guinea, Guyana, Equatorial Guinea, Mali, Malawi, Mozambique, Madagascar, Maldives, Nicaragua, Timor Leste, St Maarten; Tonga, Zambia, Botswana, Lesotho, Zimbabwe, Zambia)
- + Numbers 2x over 2025
- + Legitimate registries used by sanctioned ships: Oman, Vanuatu, Cameroon, Comoros, Gambia, Palau (crackdown in 4Q25)
- + Panama 3Q23 regulatory change
- + Opportunistic flaggers (Barbados, Gabon, Cook Islands, San Marino, Guinea-Bissau) dropped sharply
- + Is model broken? Vulnerability to detention/seizure under Article 110 of UNCLOS

RUSSIA RECLAIMS DARK FLEET AS TANKERS SEIZED, DETAINED

- + ~70 sanctioned/false-flag tankers reflagged to Russia in past year; 48 since Dec.
- + More than 19 'stateless' ships detained and boarded by US and EU
- + Tankers shift to 'legitimate' registries to avoid 'interdiction in EU and UK coastal waters (UNCLOS Article 110 allows authorities to board stateless vessels).
- + Is fraudulent registry model broken? ~70 similar tankers could reflag in coming months

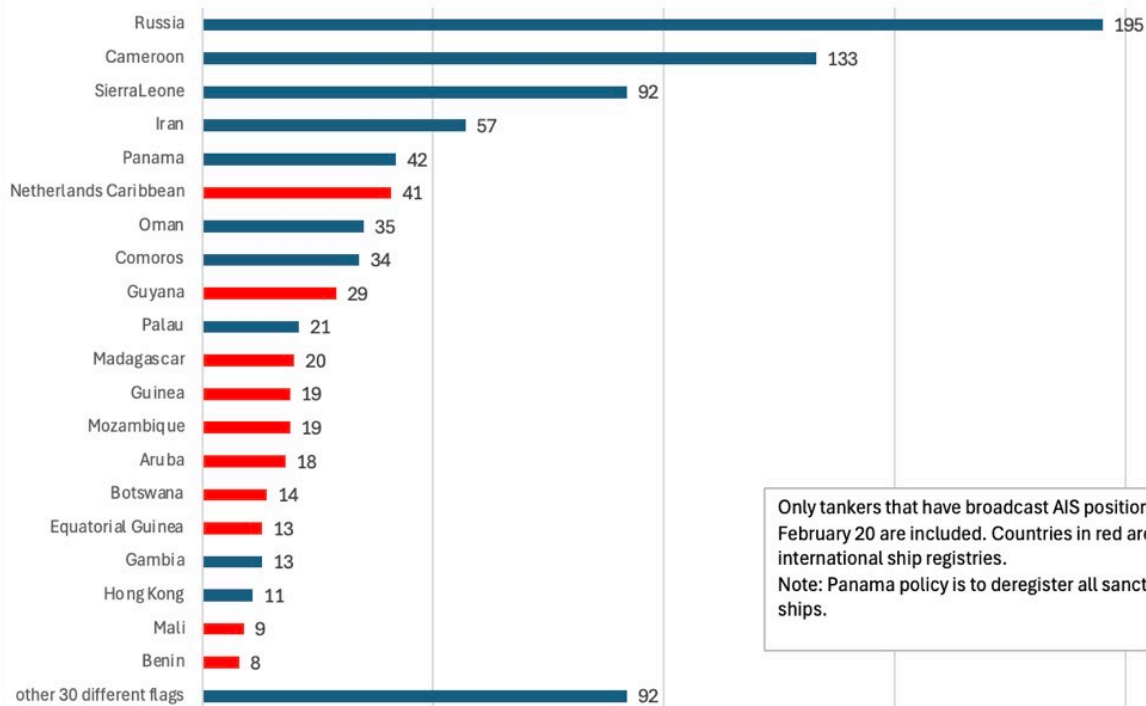


Strateg sails through the Bosphorus with a new name and flag on December 29.
Credit Yörük Işık

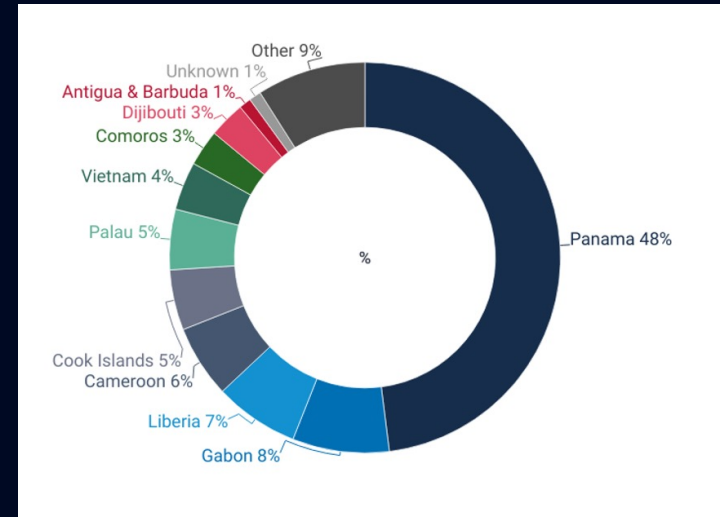
FLAG STATE: THEN AND NOW

Flags broadcast via AIS of US/UK/EU-sanctioned tankers by number of ships

Source: Windward



Only tankers that have broadcast AIS position since February 20 are included. Countries in red are fraudulent international ship registries.
Note: Panama policy is to deregister all sanctioned ships.



The dark fleet by flag composition March 2024 (above) and May 2026 (left)

FALSE FLAGS

FRAUDULENT REGISTRIES

Falsely flagged ships are defined as those confirmed by a country's maritime administration as not flying their flag.

- + Some 290 internationally trading tankers broadcasting via AIS flag of a fraudulent ship registry end Q126 (285 Q425)
- + 88% of ships using fraudulent registries were Western-sanctioned
- + The most frequently used fraudulent registry was the Netherlands Antilles (52 ships), followed by Guyana (43), Guinea (28) and Madagascar (24).
- + IMO database: 550 falsely flagged ships, (up 470 on prior quarter) including. 367 falsely flagged tankers.

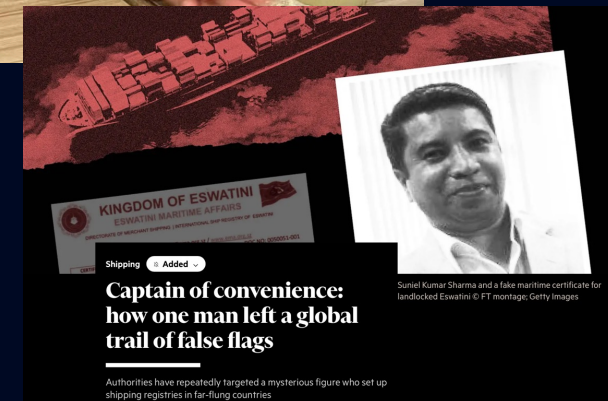
FALSE FLAGS FRAUDULENT REGISTRIES



Chariot Tide transits Bosphorus May 2, 2026 photo Yoruk Isik

THE 'CAPTAIN OF CONVENIENCE'

- + Suniel Kumar : “investor & developer” linked to Alexarya Corporation International, Chandigarh, India & managing director of Oceaniek
- + Linked to Eswatini, Guyana (IMSAG still operating), Samoa, and at least 12 other flags latest registration is Nicaragua (February 2026)
- + Along with wife Jaspreet Kaur was censored by DG Shipping in 2019 for running fraudulent maritime training academies (new one just identified) [ac](#)
- + With registration ~\$20,000 for aframax tanker, earnings in excess of ~\$2m



THE 'CAPTAIN OF CONVENIENCE'



MOZAMBIQUE MARITIME ADMINISTRATION SHIP CERTIFICATE DETAILS

SHIP NAME	PACIFIC RUNNER
IMO NUMBER	9285859
CALL SIGN	C9N144
OFFICIAL NO	MZ 0733004

LIST OF CERTIFICATE ISSUED

01	Certificate Name	CERTIFICATE OF REGISTRATION
	Certificate No	MZ/RC/214102/TRC/25
	Date of Issue	18 TH AUGUST 2025
	Valid Until	17 TH NOVEMBER 2025
	Status	VALID
02	Certificate Name	INTERNATIONAL TONNAGE CERTIFICATE 1969
	Certificate No	MZ/ITC/214212/TRC/25
	Date of Issue	18 TH AUGUST 2025
	Valid Until	—
	Status	VALID
03	Certificate Name	MINIMUM SAFE MANNING CERTIFICATE
	Certificate No	MZ/MSMC/214304/TRC/25
	Date of Issue	18 TH AUGUST 2025
	Valid Until	17 TH NOVEMBER 2025
	Status	VALID

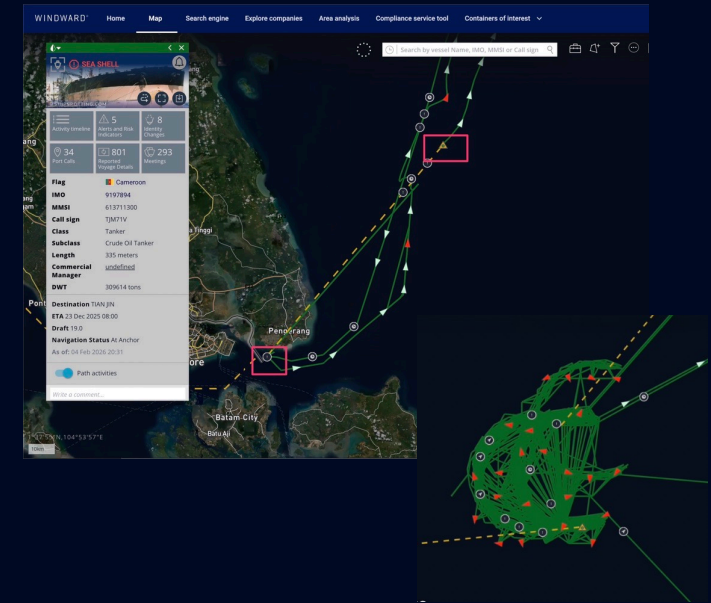
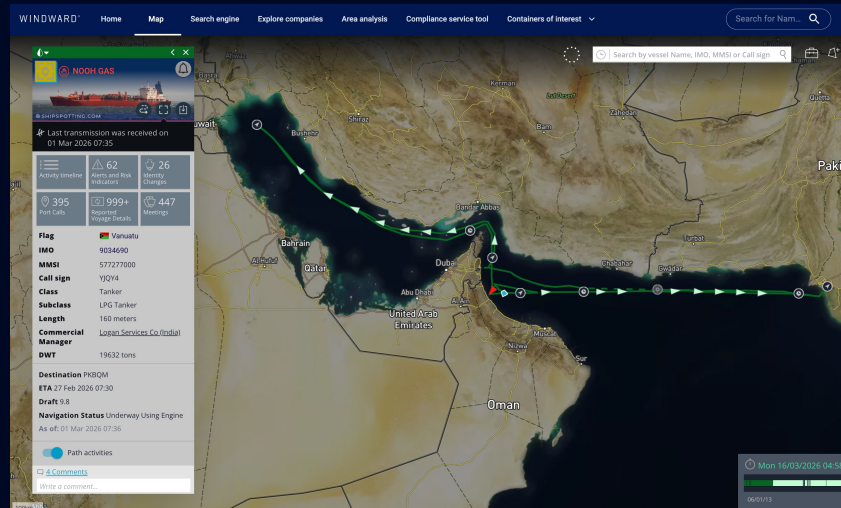
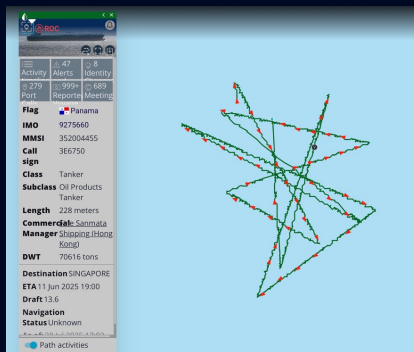


The Directors of Atlantic-Alexarya Maritime Development Guyana Inc. From left: Nicola Whittaker, Asif Hamid, Nareema Khan, Capt. Suniel Kumar, Miranda Thakur-Deen, and PRO Jaspreet Kaur.

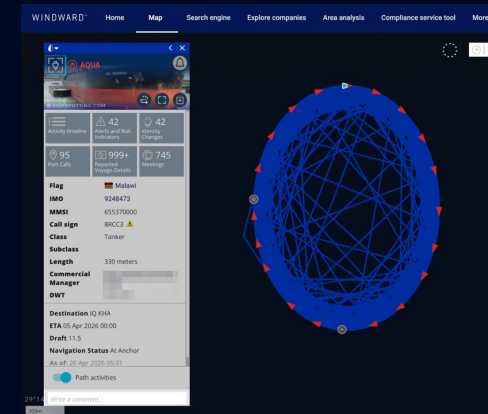
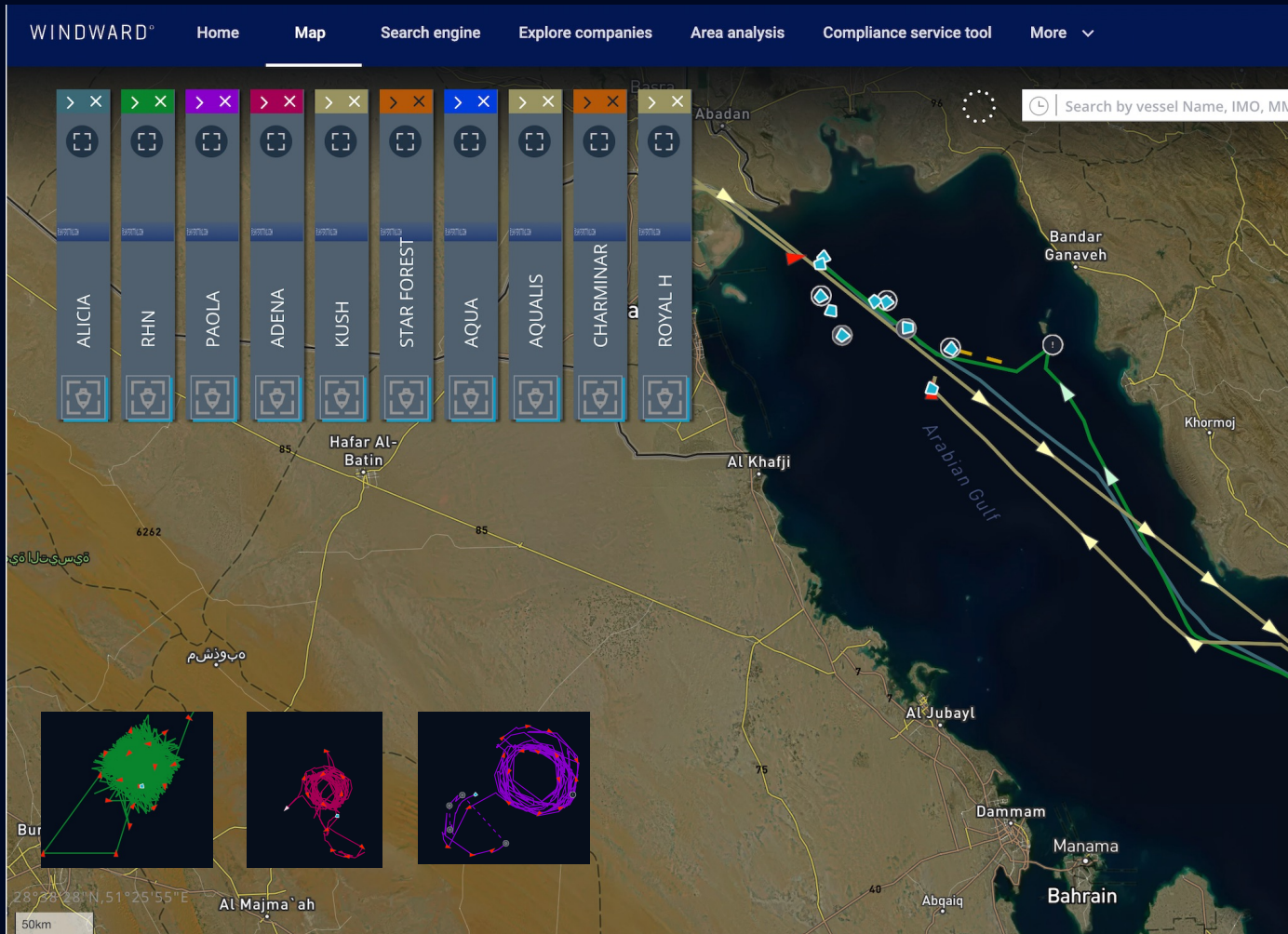
GNSS MANIPULATION (SPOOFING)

Location (GNSS) manipulation refers to the deliberate falsification of a vessel's location data. Fake vessel movements can be obvious or disguised as normal pathway.

- + Used to disguise loadings at Iran, formerly Venezuela, and for Russia LPG & LNG, also for ship-to-ship transfers
- + Hotspots: Areas off West Africa, Gulf of Oman, near Basrah anchorages, Iraq, Riau archipelago, Chinese waters, Russian Arctic waters



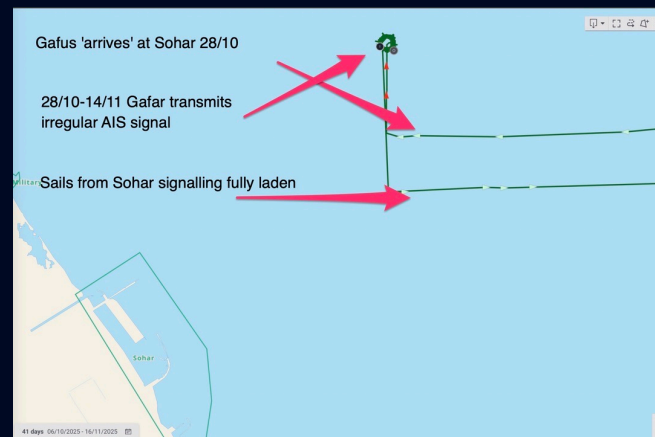
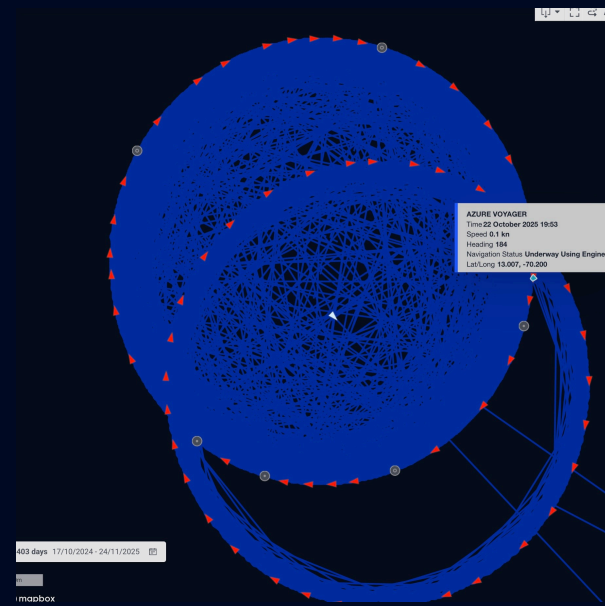
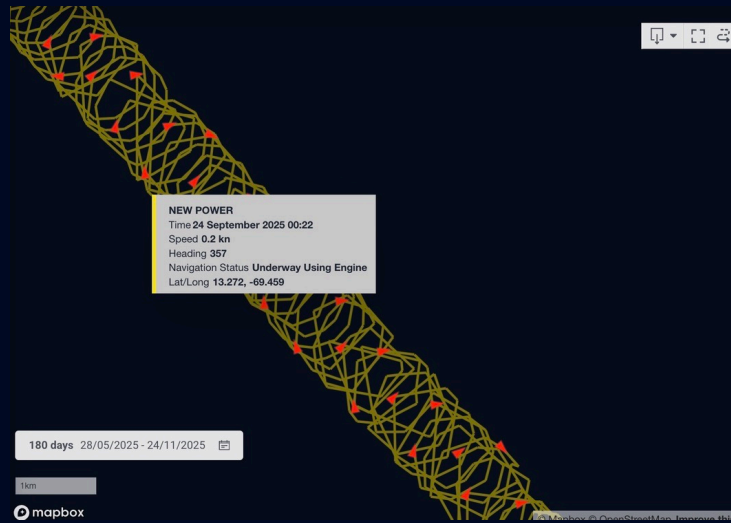
SPOOFING IRANIAN TANKERS APRIL 28



US-sanctioned tankers spoof their position to falsely appear loading oil or LPG in Iraq.

Many will also signal via AIS their next port of call is "Basrah" as part of subterfuge

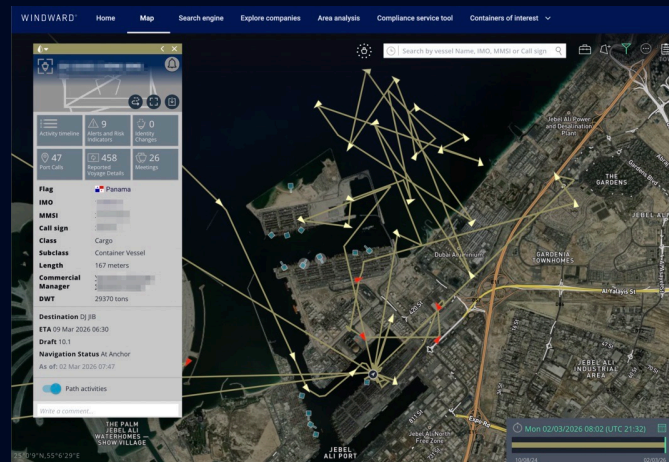
GNSS MANIPULATION (SPOOFING)



GPS JAMMING IN THE MIDDLE EAST WAR

GPS jamming is intentional interference with Global Positioning Signals to disrupt navigation and tracking. It is typically used by external entities to create confusion, or make it difficult for vessels, aircraft, or vehicles to navigate in certain areas. This tactic can obscure movements, protect sensitive operations, or cause disruption to both military and civilian navigation systems.

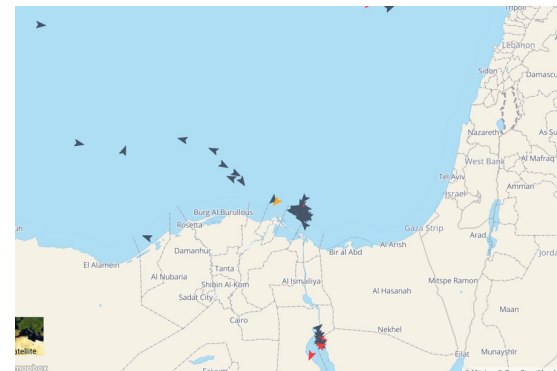
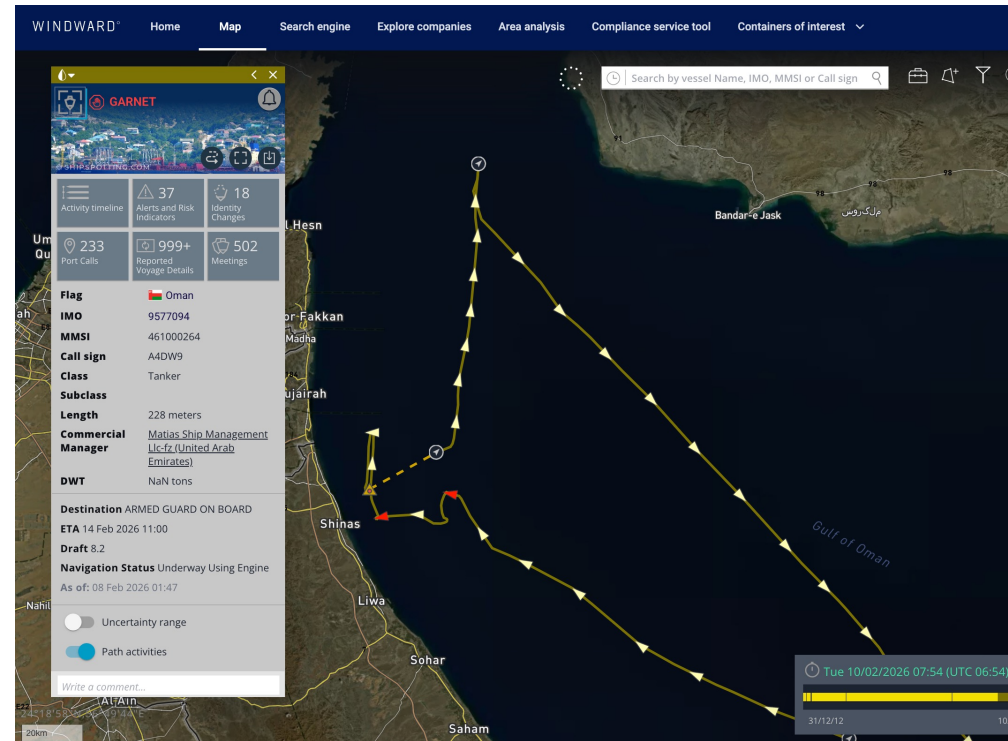
- + ~32,000 vessels affected in 2025, fresh records set over 1Q26, with more than 978,000 events in Q126, 98% in the Middle East.
- + Arabian Gulf, Black Sea, Baltic Sea, Red Sea top targeted regions



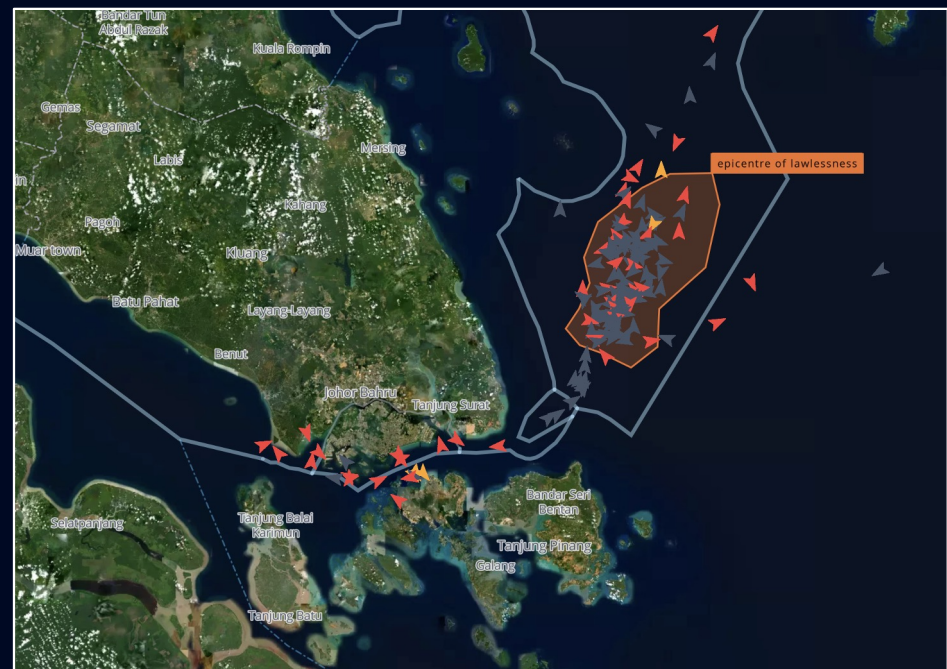
Above: GPS jamming events in Middle East Gulf

STS HOTSPOTS

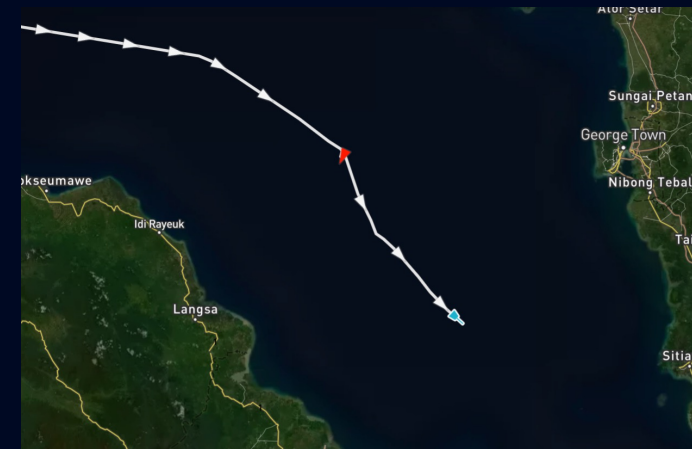
Ceuta, near Gibraltar
 Augusta, Italy
 Malta
 eastern Malaysia anchorage (Riau
 archipelago)
 Anchorages off western Malaysia (Linggi)
~~Kalamata outside Laconia Bay, Greece~~
 Kavkaz, Russia
~~Mid-Atlantic~~
~~Yeosu, South Korea~~
 Sohar & Duqm anchorages, Oman
 Fujairah, UAE
 Karimun, Indonesia
 Lome, West Africa
 Cyprus
 Nakhodka Bay, Russia
 Port Said, Egypt
 Togo, West Africa
 Hong Kong, China



THE EPICENTRE OF MARITIME LAWLESSNESS ON ASIA'S DOORSTEP



'ZOMBIE SHIPS' – BELAMA SWEET (IMO 9088689)



Stops broadcasting under this identity on March 11 as enters Singapore Strait

'VESSEL IDENTITY FRAUD – TAVIAN

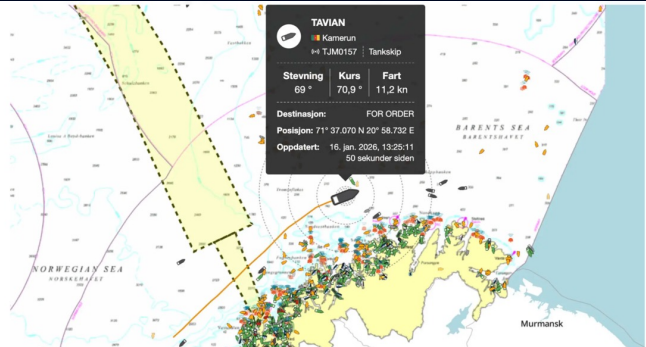
News > UK > UK Politics

Russian 'zombie' tanker sanctioned by U sails through English Channel

The Tavian's route comes a day after Britain helped US forces capture a Russian-flagged vessel, the Marinera, previously linked to Venezuela, between Iceland and Scotland

Kate Devlin Whitehall Editor
Thursday 08 January 2026 19:41 GMT

42 Comm



TAVIAN
Kamerun
TJM0157 Tankkip

Stevning	Kurs	Fart
69 °	70,9 °	11,2 kn

Destinasjon: FOR ORDER
Posisjon: 71° 37.070 N 20° 58.732 E
Oppdatert: 16. jan. 2026, 18:25:11
50 sekunder siden

Tanker "Tavian" is operating under fake IMO number. On January 16, 2026 the ship sailed in the Barents Sea en route to Murmansk. Map: NAIS BarentsWatch

Tanker with false IMO number sails in the Barents Sea


After having been banned from German territorial waters, the "Tavian" sailed north along the Norwegian coast en route to Murmansk.

INVESTIGATIONS

NEWS

Germany blocks Russian "shadow fleet" tanker from entering its territorial waters in unprecedented move

The Insider
15 January 2026 15:44



marinetraffic
© Frank Behling

Germany has denied the Cameroonian-flagged tanker Tavian entry into its territorial waters, according to reports by *Süddeutsche Zeitung*, *NDR* and *WDR*. This is the first known instance of a vessel linked to Russia's "shadow fleet" being barred from the area. As *The Insider* has learned, the tanker was refused entry while it was still in Danish waters and subsequently changed course. What exactly

MARINE INSURERS -FLAG STATES FAILURE

In addition to Russian insurers network of marine insurers, some fraudulent, others established to provide Blue Cards with liability questions

**KOMINSUR**
INSURANCE BROKER

TO: THE OWNER Tallinn, Estonia
19 September 2022

Quotation P&I

Assured:
Registered Owner

Manager/Operator:
Sea Art Ship Management, India as Managers/Operators
and/or Associated and/or Affiliated and/or Subsidiary companies for their respective rights and interests

Vessel(s): **MT "EASTERN PRIDE"**

Period: **12 (twelve) months**

Security: **100% Ingosstrakh Insurance Co, Moscow**

Limit: **USD 1,000,000,000**

-USD 175,000 per crew member under Sections 1.2, 1.3 and 1.4 for medical, hospital, funeral and other expenses reasonably and necessarily incurred in relation to injury, illness or death of crewmember, including expenses of repatriating the crewmember and sending a substitute to replace, as well as for compensations in case of death or disability in accordance with the crew contract approved by Ingosstrakh - any one accident or occurrence;
- USD 3,000 per person in respect of claims under Section 1.5 – any one accident occurrence;
- USD 500,000 under Section 1.16 – any one accident or occurrence;
- USD 3,000,000 – aggregate limit in respect of claims under Section 2.10 and additional cover in accordance with requirements under amendments 2014 to MLC'06 – any one event;
- USD 50,000,000 in respect of Section 2.5 any one accident or occurrence;
- USD 1,000,000,000 in respect of all claims – aaaa. Combined Single Limit

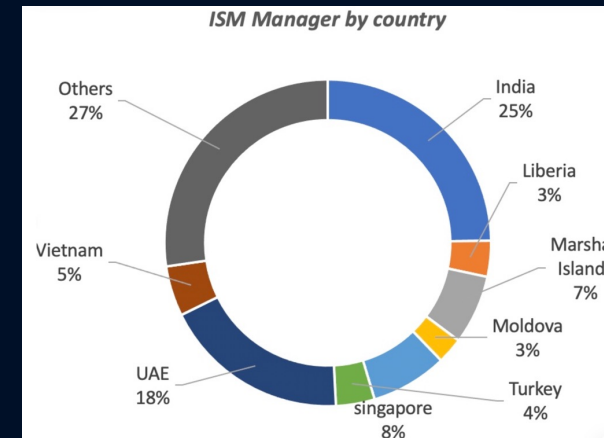
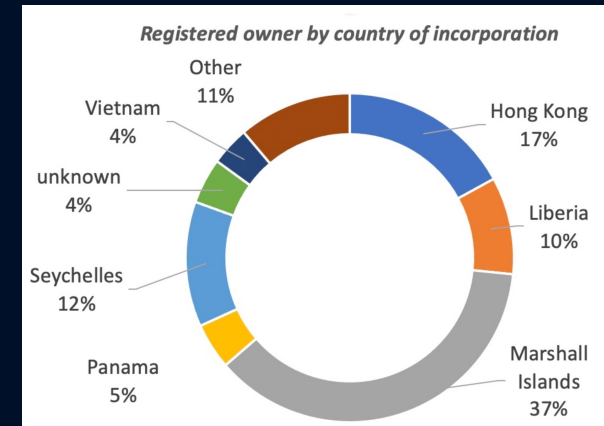
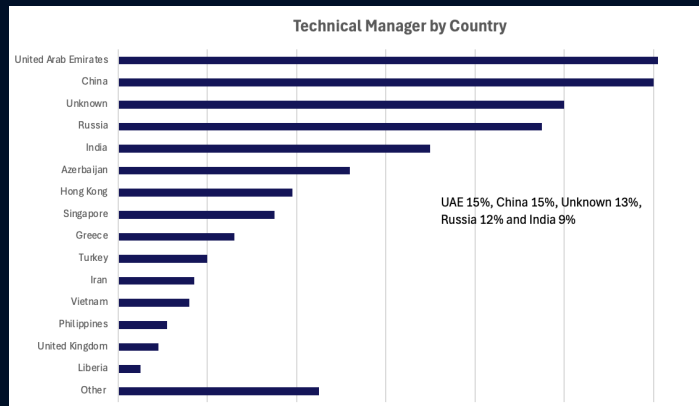
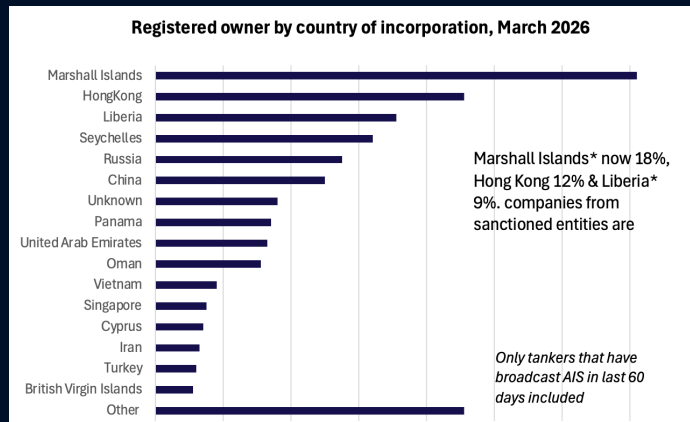
Conditions: **As Per Ingosstrakh Insurance Co Rules**

Deductibles: RDC/FFO: USD 30,000 each incident
Cargo: USD 30,000 each incident
Crew: USD 3,500 each incident
Other: USD 15,000

Kominsur Insurance Broker Ltd.
Reg.code.11111547
22, Villardi Str. 10136 Tallinn, Estonia
Tel. (+372) 66 44 388
Fax (+372) 64 55 015
E-mail: info@kominsur.ee
www.kominsur.ee

- * Ascent General Insurance Company
- * Los Andes de Protección de Indemnización
- *The Continental Steamship Owners Mutual Protecting & Indemnity Association Ltd
- * East of England P&I Association Ltd
- * Edinburgharian PANDI Management Ltd
- * Maritime Mutual Insurance Association (NZ) Ltd
- * Odine Marine Inc
- * Pacific Marine Club
- * Pyramid Marine Overseas
- * Ro Marine
- * Stiga Marine P&I
- * Sun Re
- * Vietnamese insurer

REGISTERED OWNER/TECHNICAL MANAGER THEN AND NOW



HOW THE DARK FLEET WAS MADE (1)

- + Incorporate 'front' company/companies wholly owned by shareholder front person apparently unconnected to ultimate beneficial owner in select jurisdiction. Legal consultant employed to undertake all paperwork required for incorporation of all entities
- + Incorporate single vessel entities (special purpose vehicle) in same jurisdiction for each tanker upon purchase that is wholly owned by the front company. Each SPV is 100% owned by front person who is sole president/secretary/director
- + Purchase agreement signed between front company and seller to buy vessel with the single vessel entity nominated as buyer
- + Establish escrow agreement between front company, the seller and an 'escrow agent'. This satisfies KYC obligations
- + Nominate front people to be granted powers of attorney in purchase agreement to execute sale and purchase deal. Funds for vessel paid to escrow agent for distribution to sellers from buyers, along with fees to shipbroker involved in sale

HOW THE DARK FLEET WAS MADE (2)

- + Sign bareboat charter between front company and oil company (usually two years). Charterparty is nominated in non-US currency. Total value of agreement typically around same price as purchase price
- + Shipmanagement agreement signed with other newly incorporated entities, which are normally related to the beneficial owner. Typical fees secured of around \$2.5m/year/ship. Each shipmanagement entity is usually another SPV, also owned by another front person, established in friendly jurisdiction outside Western influence
- + Insurance placed outside P&I International Group of 12 clubs, usually Russian
- + Vessels reflagged/classed to unquestioning jurisdiction using same legal consultants or another 'one stop' marine service provider

HOW THE DARK FLEET WAS MADE (3)

POWER OF ATTORNEY

By this Power of Attorney, **ANANDYA SHIPPING LTD**, a company incorporated under the laws of the Republic of Marshall Islands according to the provisions of the Marshall Islands Business Corporation Act under Reg. No. **117659**, with its registered office at Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of the Marshall Islands MH96960 (the "**Company**"), does hereby make, constitute and appoint each of John Michael Ormerod holder of United Kingdom passport number 555140004 and/or, Subba Rao Varanasi holder of Indian passport number Z2835923 and/or, and Sujan Jyot Singh Malhotra holder of Indian passport number Z4545916 and/or, Kowshik Kuchroo holder of Indian passport number Z4040081, and/ or Idil Halliloglu holder of Turkish passport number U24254129 (each the "**Attorney**" and together the "**Attorneys**"), each acting independently, to be its true and lawful Attorney, with full power of substitution, for it and in its name, place and stead to do all or any of the following acts, deeds, matters and things:

- 1 to negotiate, agree, make, amend, sign, seal, execute, deliver, perfect and (where appropriate) register all things and measures, at, for and on behalf of the Company in connection with:
 - (i) the memorandum of agreement (as amended and supplemented from time to time) (the "**MOA**") dated 20 December 2022 between Deep Sea Maritime Ltd of Malta as seller (the "**Seller**") and Eudora Ltd of the Marshall Islands as buyers ("**Eudora**"), and the addenda to the MOA, including addendum 2 whereby Eudora nominated the Company as buyers of the Vessel pursuant to which the Company agreed to purchase the vessel "**ALHANI**" with **IMO Number 9331153** (the "**Vessel**") at the price of United States Dollars forty three million (USD 43,800,000.00) (the "**Purchase Price**") and any further addenda thereto;
 - (ii) the escrow agreement (as amended and supplemented from time to time) dated 27 December 2022 entered into by (amongst others) Eudora, the Seller and Theo Sioufas Escrow Services LLP (the "**Escrow Agreement**") in relation to the payment of the Deposit and the Balance of the Purchase Price of the Vessel and any further addenda thereto, with respect to the deposit and release of the Purchase Price plus extras;
 - (iii) any necessary addenda to the MOA and the Escrow Agreement.
 - (iv) any necessary acceptance of the bill of sale in respect of the Vessel;
 - (v) all documents necessary to pay the purchase moneys in respect of the Vessel, to pay any sums due in respect of unused lubricating oils, hydraulic oils and greases, and to pay any commission and to make any other payments in respect of the Vessel pursuant to the MOA;
 - (vi) the protocol of delivery and acceptance in connection with the delivery of the Vessel to the Company;
 - (vii) such other instruments and documents as may be negotiated and agreed between the Seller and the Company,
- (together the "**Documents**");

RESOLUTIONS IN WRITING OF THE DIRECTORS OF

ANANDYA SHIPPING LTD of Marshall Islands Reg Number 117659

The Sole Director of **ANANDYA SHIPPING LTD** (the "**Company**") is aware that the Company intends to purchase (the "**Purchase**") the vessel "**Alhani**" with **IMO Number 9331153** (the "**Vessel**") from **DEEP SEA MARITIME LTD** of Malta (the "**Seller**") at a purchase price of United States Dollar forty three million (USD\$ 43,800,000.00) (the "**Purchase Price**") pursuant to a memorandum of agreement dated 20 December 2022 (the "**MOA**") between the Seller as seller and Eudora Ltd ("**Eudora**") as buyer (as amended and supplemented by Addenda and as may be further amended and supplemented from time to time) and whereby pursuant to Addendum No. 2 to the MOA, Eudora nominated the Company as buyer of the Vessel. The MOA and all related Addenda were reviewed by the Directors.

The Director is also aware that Eudora entered into an Escrow agreement dated 27 December 2022 entered into by (amongst others) Eudora, the Seller and Theo Sioufas Escrow Services LLP (the "**Escrow Agent**") (the "**Escrow Agreement**") as may be further amended and supplemented from time to time) in relation to the holding and payment of the Purchase Price of the Vessel. The Directors noted considered, approved and ratified (where applicable):

1. that the Company accepts its nomination as buyer under the MOA and approves and ratifies the terms of the MOA and agrees to be bound under the terms of the MOA and purchase the Vessel in accordance with the MOA;
2. the terms of the release of the Purchase Price and all other terms contained in the Escrow Agreement;
3. the entry by the Company into and, where applicable, the ratification of the entry into by the Company of the following documents (together, the "**Documents**"):
 - (a) the MOA and any required addenda in particular but not limited to the Addenda nominating the Company as buyer under the MOA;
 - (b) the Escrow Agreement and all related documents/notices/addenda required by the Escrow Agent to be signed by the Company in relation to the release of the deposit and balance of the Purchase Price (if any);
 - (c) all documents necessary to:
 - i. transfer the Purchase Price in respect of the Vessel to the Seller or its nominated account;
 - ii. pay any sums due in respect of unused lubricating oils, hydraulic oils and greases and/or any other amounts due to the Seller;
 - iii. pay any amounts required in relation to the dry docking, class survey and inspection of the Vessel;
 - iv. pay any other payments in respect of the Vessel;
 - v. a protocol of delivery and acceptance in connection with the delivery of the Vessel to the Company;
 - vi. such other instruments and documents as may be negotiated and agreed between the Company and the Seller with respect of the Purchase; and

HOW THE DARK FLEET WAS MADE (4)

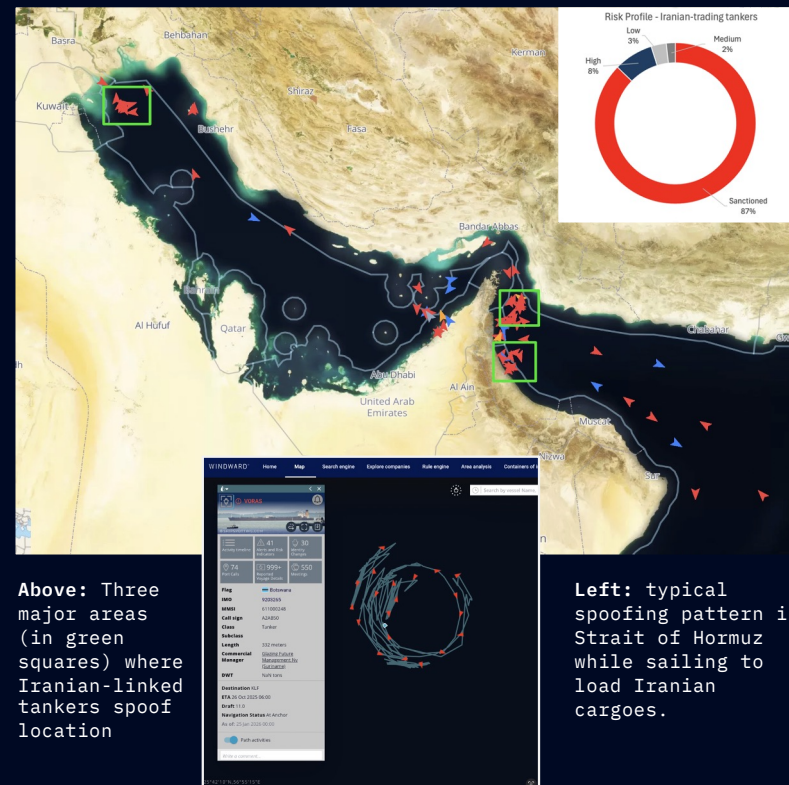
In 1974 as "Barecon A", "and Barecon B" Revised and amended 1969

The Documentary Committee of the Japan Shipping Exchange, Inc., Tokyo

1. Shipbroker Not Applicable		THE BALTIC AND INTERNATIONAL MARITIME COUNCIL(BIMCO) STANDARD BAREBOAT CHARTER CODE NAME: "BARECON 2001"		PART I
3. Owners/Place of business (Cl.1) Grand Eagle Maritime Inc Trust Company Complex, Ajeltake Road, Ajeltake Island, Majuro, Republic of the Marshall Island, MH 96960 or its vessel owning nominee		2. Place and date Dubai, UAE on 30th November 2022		
4. Bareboat charterers(Charterers)/Place of business (Cl.1) Eiger Shipping DMCC Almas Towers, 18 th Floor, JLT Dubai, UAE		5. Vessel's name, Call Sign and Flag (Cl. 1 and 3) MT KUDOS STARS (EX- DELTA CAPTAIN) ; CALL SIGN : ESU4605 FLAG : COOK ISLANDS		
6. Type of Vessel Oil Tanker		7. GRT/NRT 62,320/ 33,887		
8. When/Where built HYUNDAI SAMHO HEAVY INDUSTRIES CO LTD- KOREA		9. Total DWT (abt.) in metric tons on summer freeboard 111,008.60 MT		
10. Classification Society (Cl. 3) CCS		11. Date of last special survey by the Vessel's classification society 26TH JULY, 2020		
12. Further particulars of Vessel (also indicate minimum number of months' validity of class certificates agreed acc. to Cl.3) Further particulars of the Vessel to be as per the Specifications.				
13. Port or Place of delivery (Cl.3) SINGAPORE		14. Time for delivery (Cl.4) On or AFTER 20th DEC, 2022	15. Cancelling date (Cl.5) On or before 31ST DEC, 2022	
16. Port or Place of redelivery (Cl.15) One Safe port within trading limits stated in Box 20		17. No. of months' validity of trading and class certificates upon redelivery (Cl.15) Three months, or until the 20 year anniversary, whichever is the lesser.		
18. Running days' notice in other than stated in Cl.4 N/A Immediate delivery upon takeover		19. Frequency of dry-docking (Cl.10(g)) In accordance with Class rules and regulation and flag state requirements, including the case of emergency.		
20. Trading limits (Cl.6) Trading via safe ports / safe anchorages excluding North Korea, Somalia, Iran, Sudan, Cuba and Syria. The Charterers shall be permitted to order the Vessel into a War Risk area subject to / in accordance with rider clause 47. The Charterers shall be permitted to break the IWL limits, without Owners' consent, in so long as they act in accordance with the requirements of the applicable insurances.				
21. Charter Period (Cl.2) Firm 24 months plus or minus 15 days in Charterers' option.		22. Charter Hire (Cl.11) AED 129,274,612 (EQUAL TO AED 177,088.51 PER DAY FOR 24 MONTHS)		

RUSSIA LEARNS FROM IRAN'S RESILIENT, SANCTIONS-EVADING MARITIME FLEET

- + 62% of ~430 tankers in trade are falsely flagged, 87% sanctioned, about 1.8mbpd shipped to China
- + 43% of tankers have ISM managers in China, India, Hong Kong or UAE
- + Marshall Islands, Hong Kong, China & Panama top 4 countries of incorporation of registered owner
- + Insurance unknown for all but handful
- + Well-developed financial networks to operate beyond Western jurisdiction
- + ~100 LPG carriers engaged in Iranian trades,
- + Highly inefficient – 3-4 STS transfers from load port to discharge port
- + Difficult to detect and track; using spoofing, IMO and/or MMSI fake or defunct identities



HOW TO WIN THE BATTLE FOR THE SEAS

- + Enforce UNCLOS: US provided a template for shutting down dark fleet operations
- + Strengthen evidence-sharing between MoUs: Coast guards collect insurance/flag & intelligence. Share it.
- + Sniffer drones for MARPOL Annex VI. Violations to other MoUs for PSC targeting at other ports. Work with Singapore & Malaysia over unauthorised STS in EEZ.
- + Work at IMO to propose ban on internationally trading tankers over 25 years: similar to how OPA 90 and Exxon Valdez oil spill that triggered a global phase-out of single hull tankers in the noughties
- + Ask IMO to publish weekly false flag lists
- + EU/UK/US regulators work to provide 'exit ramp' to scrap sanctioned dark fleet tankers
- + Support IMO legal committee: work dealing with fraudulent and substandard ships obstructed by beneficiaries of discounted sanctioned oil, and proxies.
- + Keep targeting enablers: Flag governance crackdown/Chinese receivers
- + Mandatory publication of P&I providers



THANK YOU!

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