



REPUBLIC OF VANUATU
OFFICE OF THE
MARITIME ADMINISTRATOR

VANUATU INTERNATIONAL SHIPPING REGISTRY

Circular #32

Preventative Measures Against Sanctioned Vessels and "Shadow Fleet" Operations

Date: March 16, 2025

From: Office of the Maritime Administrator, Vanuatu International Shipping Registry

To: All Shipowners, Masters, Managers, Special Agents, Recognized Organizations and Relevant Stakeholders

Executive Summary and Purpose

The Government of the Republic of Vanuatu, as a committed Member State of the International Maritime Organization (IMO), maintains a zero-tolerance policy towards illegal maritime operations. This Circular is established to implement the framework of **IMO Resolution A.1192(33)**, aimed at combating the risks posed by the so-called "dark fleet" or "shadow fleet." The Vanuatu International Shipping Registry (VISR) is taking these administrative steps to ensure the highest standards of maritime safety, security, and environmental protection by preventing sanctioned entities from utilizing the Vanuatu flag.

Registration Vetting and Compliance Monitoring

This policy applies to all vessels currently registered with VISR and all new applicants seeking registration. During the initial registration phase, VISR will conduct rigorous due diligence to ensure no vessel, owner, or related entity is subject to international sanctions or bilateral restrictive measures. Any link to sanctioned activities will result in an immediate rejection of the registration request.

For vessels already under the Vanuatu flag, VISR maintains continuous monitoring. Should a vessel become subject to international sanctions during its registration period, the Registry will perform a final verification of the status and proceed with the immediate removal of the vessel from the Vanuatu International Shipping Registry.

Administrative Penalties and Recovery

Effective immediately, an administrative penalty of **20,000 USD** shall be imposed on any Vanuatu-registered vessel that is confirmed to be subject to international sanctions. This penalty serves as a deterrent against participation in shadow fleet operations and covers the administrative costs associated with emergency de-registration.

The administrative penalty must be settled in full during the de-registration process. VISR will strictly withhold the issuance of the Deletion Certificate and the updated Continuous Synopsis Record (CSR) until all outstanding fees and the 20,000 USD penalty are paid.

Operational Recommendations for Managers

Owners and ship managers are urged to maintain robust internal compliance programs to monitor their vessels' sanction risks. To avoid the aforementioned administrative penalty, any vessel at risk of being sanctioned is strongly encouraged to voluntarily de-register from VISR prior to the official imposition of such sanctions.

The validity of this Technical Circular remains in effect until further notice or supersession by the Administration.

For the Maritime Administrator of the Republic of Vanuatu



Saade Makihouf
Maritime Administrator of the Republic of Vanuatu