

CIRCULAR	Circular No. 032 (Amended)
SUBJECT	Preventive Measures Against Sanctioned Vessels and Shadow-Fleet Operations
FROM	Office of the Maritime Administrator, Vanuatu International Shipping Registry
TO	All owners, beneficial owners, managers, operators, charterers, Special Agents, ROs, FSIs, insurers, P&I Clubs, banks, brokers and stakeholders
AMENDMENT DATE	20 August 2026
EFFECTIVE DATE	Upon publication
STATUS	Version 2.0 - Supersedes the prior version of Circular No. 032

Authority and legal status. This Circular is issued by the Maritime Administrator under the functions and powers conferred by the Maritime Act [CAP 131], as amended by the Maritime (Amendment) Act No. 21 of 2025, including section 10C where applicable, and any additional written authority lawfully applicable to the subject. It shall be read with applicable mandatory IMO instruments and controlled VISR policies. It does not convert a direct statutory power into a delegated power, transfer a function assigned by law to another State entity, or amend any valid appointment, concession or other governing instrument.

Related controlled policies: VISR-QMS-POL-REG-003 - Regulatory Monitoring, Legislative Change and Administrative Decisions Policy; VISR-QMS-POL-CI-002 - IMSAS Compliance, Internal Audit, Corrective Action and Continual Improvement Policy; VISR-QMS-POL-REC-005 - Document and Records Control, Retention and IMSAS Evidence Management Policy.

1. Risk-based objective

VISR applies enhanced due diligence to prevent registration, continued operation or service support involving sanctioned parties, deceptive shipping practices or shadow-fleet activity that may expose the Vanuatu flag, Government, financial institutions, insurers or counterparties to unacceptable legal, safety, environmental or reputational risk.

2. Indicators requiring enhanced review

- Complex, opaque or recently changed ownership, management, chartering, flag, class, insurer, P&I, bank or payment arrangements.
- Frequent changes of name, flag, call sign, MMSI, class or management, especially without a credible commercial explanation.
- AIS disabling, manipulation, spoofing, inconsistent identity data, unexplained loitering, high-risk ship-to-ship transfers or irregular trading patterns.
- Use of aged vessels with weak maintenance, expired certification, unknown insurance, non-IACS class or repeated PSC deficiencies.
- Links to listed persons, blocked property, restricted cargoes, sanctioned jurisdictions, high-risk intermediaries, false documentation or evasion typologies.
- Payment from unrelated third parties, cryptocurrency or opaque structures that prevent identification of the true source and beneficiary.

3. Mandatory due diligence and continuing disclosure

- Identify and verify registered and beneficial owners, controllers, managers, charterers, financiers, insurers, cargo interests and relevant counterparties.
- Screen against applicable United Nations measures and other sanctions or restrictive measures adopted or applied through Vanuatu law, Registry policy, banking or operational requirements.
- Provide complete AIS, trading, cargo, STS, flag, class, insurance and ownership history when requested.
- Notify VISR before any material change and immediately upon learning of a sanctions designation, investigation, blocked payment or deceptive-practice concern.
- Owners and agents remain responsible for the completeness and accuracy of information supplied by brokers, nominees and intermediaries.

4. Registry measures

VISR may require enhanced due diligence, independent legal or technical opinions, additional inspections, operational undertakings, security, periodic reporting or refusal of high-risk activity. It may suspend services or registration where information is incomplete, misleading, unverifiable or indicates unacceptable risk, subject to applicable law and fair process.

Compliance records and communications

All applications, approvals, notices, reports, evidence, decisions, acknowledgements and corrective-action records required by this Circular must be transmitted through an official VISR channel and retained in the controlled Registry file in accordance with the VISR records policy. Communications from unverified domains or persons without written authority must not be relied upon.

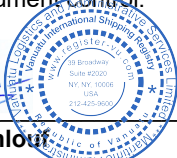
Official contact: compliance@register-vu.com. Urgent safety, casualty, sanctions or fraud matters must also be copied to info@register-vu.com and reported without delay.

Enforcement, reasons and reconsideration

Non-compliance may result in enhanced inspection, corrective-action requirements, service restrictions, suspension, administrative penalties, withdrawal or revocation of documents, or deletion from the Registry, to the extent authorized by law and the applicable written authority. Except where immediate protective action is necessary for safety, security, sanctions compliance, documentary integrity or preservation of evidence, an affected person will be notified of the material grounds and given a reasonable opportunity to respond. A request for reconsideration must be submitted in writing to the Office of the Maritime Administrator with supporting evidence within ten business days of the written decision, unless a shorter period is stated because of an urgent risk.

Supersession and effective application

This amended Circular supersedes the prior version of Circular No. 032 from the effective date stated above. Existing obligations, liabilities, investigations, fees and corrective actions arising under the prior version remain enforceable to the extent lawfully incurred and are to be administered under the clearer procedures stated in this amended version. If this Circular conflicts with a later Act, regulation or controlled VISR policy, the higher or later instrument prevails and the Circular shall be updated through document control.



39 Broadway
Suite #2020
NY, NY 10006
USA
212-425-9600

Saade Makhoul
Maritime Administrator of the Republic of Vanuatu
Vanuatu International Shipping Registry

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