

CIRCULAR	Circular No. 036 (Amended)
SUBJECT	Prohibition on Calls to Iranian Ports and Mandatory Sanctions and Maritime-Risk Compliance
FROM	Office of the Maritime Administrator, Vanuatu International Shipping Registry
TO	All shipowners, beneficial owners, managers, operators, charterers, masters, Special Agents, ROs, FSIs, insurers, P&I Clubs, banks and stakeholders
AMENDMENT DATE	20 August 2026
EFFECTIVE DATE	Upon publication
STATUS	Version 2.0 - Supersedes the prior version of Circular No. 036

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. Registry prohibition and prior written approval

As a condition of registration and continued Registry service, a Vanuatu-flagged vessel must not call at an Iranian port, conduct a ship-to-ship transfer connected with Iran, carry cargo to or from Iran, or provide related maritime service without the prior written approval of the Office of the Maritime Administrator. No commercial fixture, charter-party term, local-agent advice or third-party licence substitutes for Registry approval.

2. Minimum application for exceptional consideration

- Full voyage, cargo, ports, counterparties, beneficial owners, charterers, banks, insurers, P&I, service providers and payment arrangements.
- Independent sanctions analysis addressing applicable United Nations measures, Vanuatu law, banking and insurance restrictions and relevant foreign sanctions exposure.
- Copies of licences, exemptions, humanitarian basis or competent-authority authorizations relied upon.
- AIS, STS, routing, security, pollution, port, class and insurance risk assessment and proposed controls.
- Written confirmations from class, insurers, P&I, financiers and other essential service providers that coverage and service remain valid.
- Undertaking to provide real-time voyage and compliance information and to cease the activity if any approval, coverage or legal basis changes.

3. Emergency and safety exception

An unplanned entry strictly necessary to save life, avoid immediate danger, obtain emergency medical assistance or protect the marine environment must be reported to VISR immediately. The master must document the emergency, alternatives considered, coastal-State directions, duration, services received and departure. An emergency exception may not be used to disguise a commercial call or cargo operation.

4. Continuing sanctions and deceptive-practice controls

- Maintain continuous screening of owners, charterers, cargoes, banks, insurers, ports, terminals, service providers and vessels involved.
- Do not disable or manipulate AIS, conceal identity, falsify cargo or voyage records, use opaque payments or conduct an unreported STS transfer.
- Notify VISR immediately of designation, investigation, blocked payment, denial of insurance, licence withdrawal, inconsistent data or other material change.
- Preserve voyage, cargo, AIS, ECDIS, communications, payment and due-diligence records for inspection.
- Comply with Circular No. 032 (Amended) and the current VISR Sanctions and Restricted Parties Compliance Policy.

5. Nature of the requirement

This Circular establishes a Vanuatu Registry risk-control and approval condition. It does not state that every foreign sanctions law has identical direct legal application to every person or transaction. Owners and counterparties remain independently responsible for obtaining legal advice and complying with every law, licence, insurance term and banking restriction applicable to them.

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.

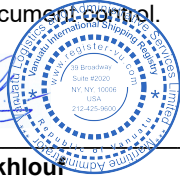
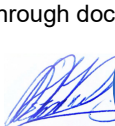
Official contact: compliance@register-vu.com. Urgent safety, casualty, sanctions or fraud matters must also be copied to info@register-vu.com and reported without delay.

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. 036 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 #0220
NY, NY 10006
USA
212-425-9600

Saade Makhoul

Maritime Administrator of the Republic of Vanuatu
Vanuatu International Shipping Registry

Issued in Port Vila and New York
20 August 2026