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, ISM managers, charterers, masters, Special Agents, ROs, FSIs, insurers, P&I Clubs, banks and stakeholders
AMENDMENT DATE	26 September 2026
EFFECTIVE DATE	Upon publication
STATUS	Version 3.0

Authority and legal status. This Circular is issued under the Maritime Act [CAP 131], as amended by Act No. 21 of 2025, including sections 9 and 10C and any additional written authority lawfully applicable. It establishes conditions of registration and Registry service and shall be read with applicable mandatory IMO instruments and VISR policies. It does not amend legislation, a valid appointment or concession, or transfer a function assigned by law to another authority.

Related instruments: VISR Sanctions and Restricted Parties Compliance Policy, VISR-POL-COM-02; Circular No. 032 (Amended); Circular No. 031 (Amended); and current VISR registration, document control and records policies.

1. Purpose

The Office of the Maritime Administrator issues this Circular to all Vanuatu-flagged vessels and all parties involved in their ownership, operation, management, chartering, certification and representation.

In light of Iran-related sanctions, restrictions and maritime security risks, Vanuatu-flagged vessels are prohibited from calling at any Iranian port, terminal, anchorage, offshore facility, loading or discharge area, shipyard or other place under Iranian port control, and from participating in the activities specified below. Only the strictly limited circumstances in sections 3 and 6 may be considered. Commercial convenience is not a ground for authorization.

This Circular protects the Vanuatu flag, vessel crews, owners and managers against sanctions, interdiction, detention, insurance, banking, commercial and reputational risk.

2. Immediate prohibition

Subject only to sections 3 and 6, no Vanuatu-flagged vessel shall, directly or indirectly:

1. call at, enter, load, discharge, bunker, repair, transship, supply, or conduct any commercial operation at an Iranian port, terminal, anchorage, offshore facility, oil or gas terminal, loading or discharge area, shipyard or other Iranian place of maritime operation;
2. carry cargo to or from Iran, or cargo owned, controlled, supplied, financed, insured, sold or purchased by a sanctioned person or entity; or commercially carry Iranian-origin crude oil, condensate, petroleum, petroleum products, petrochemicals or liquefied petroleum gas, including through third-country loading, intermediaries, blending or successive transfers;
3. conduct ship-to-ship transfers involving Iranian ports or waters, Iranian-origin or Iranian-controlled cargo, Iranian counterparties, or any sanctioned person, entity, vessel, terminal or facility;
4. enter into a charterparty, voyage order, fixture, contract or service arrangement requiring or facilitating prohibited Iran-related activity; or
5. assist, disguise, conceal or participate in a voyage, cargo movement, routing change, payment or other practice intended to evade sanctions, lawful interdiction or port restrictions, or applicable maritime security requirements.

These restrictions apply regardless of who issues the instruction. Continuous and expeditious lawful transit, without a prohibited call or operation, is not itself a port call under this Circular and does not excuse prohibited cargo or dealings.

3. Mandatory sanctions compliance and strictly limited authorization

3.1 United States measures and other sanctions regimes

All owners, operators, managers, ISM managers, masters, charterers and agents must comply strictly with United States sanctions, restrictions, designations, licence conditions and reporting requirements applicable to them or their transactions. VISR applies UN, OFAC, EU and UK restrictions as conditions of registration and Registry service under its sanctions policy, including relevant ownership, control and prohibited-activity rules.

United States measures include those administered or enforced by the Department of the Treasury, including OFAC, the Department of State, the Coast Guard and other competent authorities. Applicable lawful directions concerning maritime security, interdiction, port restrictions or blockade-related measures must be observed where such measures apply. Official advisories from the Department of Defense, the US Navy or competent maritime coordination authorities must be assessed and appropriate safety controls implemented; an advisory is not, merely by its publication, legislation.

Owners and counterparties remain responsible for current independent legal advice and compliance with applicable law, banking restrictions and insurance terms. No party may rely on informal advice, commercial assurances, an absence of vessel-specific designation, or a foreign licence as a substitute for compliance with this Circular.

3.2 No commercial exception for Iranian petroleum

VISR will not authorize commercial carriage or transfer of the Iranian-origin energy cargoes listed in section 2(2), or participation in sanctions evasion. Changing the cargo description, blending, transferring title, loading outside Iran or using an unlisted intermediary does not remove the prohibition. Necessary action under section 6 remains strictly limited to the emergency.

3.3 Exceptional humanitarian or protective operations

Outside an immediate emergency under section 6, an application may be considered only for a demonstrably humanitarian operation, such as delivery of food or medicine to civilians, or an operation strictly necessary to protect life or prevent serious environmental harm. No approval may authorize a sanctions violation, waive the VISR sanctions policy or facilitate prohibited energy trade. No automatic exemption arises from a humanitarian description, a general licence, a Government communication or a third-party authorization.

Before committing to or commencing the operation, the applicant must submit through the official channels:

- Full voyage, cargo origin and destination, ports, terminals, STS details and vessel IMO numbers; all owners and beneficial owners, operators, charterers, counterparties, banks, insurers, P&I Clubs, financiers, service providers and payment arrangements.
- Independent legal sanctions analysis addressing UN, US, EU and UK restrictions, Vanuatu law, ownership and control, the Registry policy, and every licence or exemption relied upon, with copies and evidence that all conditions are met.
- Evidence of the humanitarian or protective necessity, intended recipients and end use; verified insurance and class confirmations; and a documented AIS, routing, security, pollution, port and transfer risk assessment.
- A signed undertaking to provide live position and compliance information, accept inspection, disclose changes immediately and cease or safely terminate the operation if any legal basis, approval or essential coverage changes.

Only the Maritime Administrator may issue the Registry authorization, in writing through a verified official channel, identifying the vessel, operation, duration and conditions. An incomplete application, silence, payment of fees or an agent's assurance is not approval. Authorization is case-specific, creates no precedent and may be withdrawn when its conditions cease to be satisfied.

4. Enhanced screening and mandatory notification

Owners, operators, ISM managers and masters must conduct enhanced screening before accepting any voyage order, charter instruction, cargo, cargo interest, port call, STS transfer, bunkering operation, service or counterparty connected with Iran or presenting Iran-related risk. Screening must address beneficial ownership and control, cargo origin, trading history, payment channels, insurance and each relevant sanctions regime, and be refreshed on material change and at least daily while such exposure remains under review.

Any instruction, request, alert, designation, investigation, blocked or rejected payment, insurance denial, licence withdrawal, suspicious tracking activity or contact from a competent authority concerning Iran-related activity must be reported to VISR immediately. The vessel must not proceed with the affected operation pending a documented decision. Initial notice must not wait for completion of the investigation; available particulars and an interim report must follow within 24 hours, with further evidence as directed. Missing or contradictory information must remain unresolved and must not be recorded as cleared.

5. Prohibited deceptive practices and evidence preservation

The following practices are strictly prohibited for Vanuatu-flagged vessels and parties acting in connection with their operation:

1. disabling, manipulating, falsifying or intermittently using AIS or other tracking to conceal a vessel's identity, position, voyage or Iran-related activity;
2. changing vessel name, ownership, beneficial ownership, manager, technical operator, flag, class or documentation to conceal Iran-related activity or evade a restriction;
3. using false or misleading cargo documents, bills of lading, certificates of origin, destination documents, port records, charter documents, insurance evidence or Registry certificates;
4. using shell companies, nominees, disguised cargo descriptions, blending, transshipment, concealed STS transfers, circular payments or unrelated payers to circumvent sanctions or Registry controls; or
5. dealing with a sanctioned or restricted person, entity, vessel, terminal, port, bank, insurer, trader, cargo interest or intermediary contrary to applicable restrictions or the VISR sanctions policy.

A master's lawful safety decision to switch off AIS under applicable SOLAS requirements must be documented, limited to the period of necessity and reported to VISR as soon as it is safe to do so. AIS must be restored when the immediate risk ends. This safeguard does not permit deception or commercial concealment.

An absence of recorded Iranian port calls does not establish non-Iranian cargo origin or exclude an indirect transfer. Owners and operators must corroborate origin and chain of custody, reconcile discrepancies and retain the material supporting each screening and clearance decision. A name change or transfer of ownership does not erase the vessel's history.

Preserve original voyage, cargo, AIS, LRIT, ECDIS, logbook, STS, communications, payment and due-diligence records, including timestamps, search results and reviewer decisions. Records under this Circular must remain retrievable for at least ten years after the relevant transaction or operation, or longer where required by law or an investigation or preservation notice. Potential legal conflicts concerning retention must be escalated before records are altered or destroyed.

6. Emergency, distress and force majeure

This Circular does not prevent action strictly necessary to save life, respond to distress, obtain emergency medical assistance, avoid imminent danger to the vessel, protect the marine environment or comply with a lawful direction of a competent rescue or security authority. A master must not delay an immediately necessary safety measure merely to await Registry approval.

Where a vessel enters or approaches Iranian waters, an Iranian port or an Iran-related restricted area because of a genuine emergency, casualty, force majeure or lawful compulsion, the master and owner must notify the Maritime Administrator immediately or, if communications are unsafe or impossible, as soon as safe communication is restored. The report must identify the position, nature of the danger, alternatives considered, authority directions, cargo, voyage and AIS records, services received and intended departure.

The action must be proportionate, restricted to the necessity and ended as soon as safely possible. Commercial loading, discharge, transshipment, bunkering, repair, supply or cargo operations are prohibited except to the minimum extent immediately necessary to protect life, the vessel or the environment and lawfully permissible. Any operation beyond that necessity requires prior written authorization under section 3.

Commercial delay, a charterer's instruction, cost, loss of profit, an avoidable shortage or a contractual deadline is not, by itself, an emergency or force majeure. The exception must not be used to disguise an intended commercial call. A documented incident report must follow within 24 hours after safe communications are restored, with supporting evidence and updates as directed. The exception does not override sanctions law or any required competent-authority licence.

7. Consequences of non-compliance and review

Compliance is mandatory. The Administration applies zero tolerance to sanctions evasion, deceptive shipping practices, unauthorized Iranian port calls and prohibited Iran-related activity. A credible unresolved concern requires an immediate compliance hold on the affected Registry transaction or service pending verification; the absence of a vessel-specific designation is not a reason to postpone protective action.

Where VISR establishes an Iran-related sanctions violation, it will apply immediate deletion and permanent exclusion of the vessel and relevant violating associated parties in accordance with its sanctions policy and mandatory legal procedures. Established deliberate evasion or a prohibited commercial operation will result in immediate suspension or revocation action and deletion to the extent authorized by law. Urgent protective measures may be taken without prior notice where lawful and necessary.

Further action may include withdrawal of permissions, invalidation of documents and online verification status, enhanced inspection, corrective requirements, notification to ROs, insurers, P&I Clubs, port States, PSC authorities, banks and Government authorities, and referral to sanctions or law-enforcement authorities. Penalties, costs and investigation charges may be imposed only on an identified lawful basis. Connected applications may be refused where the same violation or unresolved risk persists.

Deletion takes effect on the date stated in the decision and does not depend on the owner's consent, payment of outstanding charges or completion of later closing documents. No person may continue to represent a deleted vessel as Vanuatu-flagged. Existing lawful liabilities survive deletion. Registry deletion does not replace any separate duty concerning financial freezing, blocking, reporting or evidence preservation; restricted property must not be refunded or remitted contrary to those duties.

The material grounds will be notified and an opportunity to respond provided, except where immediate protective action is justified; reasons and a prompt opportunity to respond must then follow as the law requires. A written request for administrative reconsideration, with supporting evidence, may be submitted within ten business days of the written decision. It does not automatically stay the decision. Statutory rights of appeal, applicable time limits and the powers of a competent court or appellate authority are preserved.

8. Recognized Organizations, inspectors and Special Agents

All ROs authorized by the Vanuatu Administration must notify the Maritime Administrator immediately if a vessel under their class or statutory certification intends to call, has called, or may be connected with Iranian activity, sanctioned cargo, restricted parties or prohibited operations. ROs shall not issue, endorse, validate or amend certificates in a manner that facilitates prohibited activity.

ROs, FSIs and Special Agents must verify Registry status, transmit relevant evidence, implement lawful written instructions and confirm the action taken. No staff member, department, agent, RO or inspector may grant an informal exception or override a hold or deletion decision. Breach may lead to suspension or withdrawal of appointment, authorization or contract, subject to applicable law and terms.

9. Effective application, communications and duration

Upon official issuance and publication, this version supersedes the amended Circular No. 036 dated 20 August 2026 and its predecessor dated 15 July 2026. Earlier lawfully incurred liabilities, investigations and corrective actions remain enforceable.

The restrictions remain in force until expressly amended or withdrawn in a controlled written instrument by the Maritime Administrator acting within lawful authority. Delisting, expiry of a licence or relaxation of a foreign measure does not itself cancel this Circular. Legislation and mandatory international obligations prevail; no informal or general administrative communication creates an implied waiver.

All owners, operators, managers, masters, charterers, agents and ROs must circulate this Circular immediately to their operational, compliance, legal, chartering, crewing, technical and commercial departments. Failure to receive or circulate it internally does not excuse non-compliance.

Official reports and applications: admin@register-vu.com and technical@register-vu.com, copied to sanctions@register-vu.com and compliance@register-vu.com. Urgent matters must also be copied to info@register-vu.com and reported without delay; telephone +1 212 425 9600. Use verified official channels and retain notices, decisions, acknowledgements and corrective-action records in the controlled Registry file.

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Vanuatu International Shipping Registry