



Antigua and Barbuda Maritime Administration

SUBJECT: Advisory on Sanctions Risk Related to Petroleum and Petroleum Products from Iran

REFERENCE:

- a) [OFAC Advisory to the Maritime Petroleum Shipping Community on Sanctions Risk Related to Shipping Petroleum and Petroleum Products from Iran.](#)

TO: Ship-owners, operators, masters and officers of Antigua and Barbuda flagged ships, and recognized organizations.

1. PURPOSE

This Circular provides information on the United States sanctions regimes with regard to the Islamic Republic of Iran, the policy of ADOMS for compliance with this sanction regime and risk mitigating measures for shipping interests.

2. APPLICATION

This Circular applies to ship owners, ship operators, ship managers and Masters and Officers of Antigua and Barbuda Flagged ships

3. BACKGROUND

The Office of Foreign Assets Control ("OFAC") of the U.S. Department of the Treasury administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States.

On 4 September 2019, OFAC issued an Advisory on sanctions risk related to petroleum and petroleum products from Iran. The Advisory provides for tough enforcement measures of the U.S. sanctions against Iran and creates significant sanctions risk for parties who knowingly engage in significant transactions for the purchase, acquisition, sale, transport, or marketing of petroleum or petroleum products from Iran or knowingly provide significant support to Iranian persons and entities on OFAC's List of Specially Designated Nationals and Blocked Persons ("SDN List") such as the National Iranian Oil Company, National Iranian Tanker Company and Islamic Republic of Iran Shipping Lines.

The Advisory further warns that the United States is committed to aggressively enforcing its sanctions against Iran and targeting shipments of petroleum and petroleum products is a critical element of its strategy.

The attached Advisory provides examples of deceptive shipping practices used by those involved in the trade of petroleum and petroleum products to Iran. It also provides for risk mitigation measures recommended for individuals and entities in the maritime space, in order to help the latter to avoid becoming involved in sanctionable trade.

Finally, the Advisory includes an Annex providing a non-exhaustive list of vessels that have been sanctioned for trade with Iran. The United States continuously updates the SDN List, and the Advisory contains further links to the official website of the U.S. Department of the Treasury which keeps an up-to-date list.

Based on the Advisory, both U.S. and non-U.S. owners, operators and other maritime industry players should avail themselves of the list from, time to time and exercise extreme caution with regard to the source of petroleum and petroleum products in order to mitigate sanctions risk.

4. OBLIGATIONS AND RESPONSIBILITIES

1. ADOMS policy statement

The Government of Antigua and Barbuda considers the mitigation of United States sanctions risk against its flagged vessels to be in its national interest and ADOMS as the Maritime Administration strongly advises all Antigua and Barbuda flagged ships to exercise extreme caution and note the provisions of the OFAC Advisory on Iran attached to this Circular in order to avoid any sanctionable activities.

2. Consequences for Violations of U.S. Sanctions against Iran

Individuals and entities engaged in shipping-related transactions should be aware of the potential consequences for engaging in prohibited, or sanctionable conduct. OFAC investigates apparent violations of its regulations and maintains enforcement authority as outlined in its Economic Sanctions Enforcement Guidelines. Persons that violate U.S. sanctions may be subject to significant civil enforcement or criminal penalties for persons or transactions subject to U.S. jurisdiction.

Issued by

Antigua and Barbuda
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