



Antigua and Barbuda Maritime Administration

SUBJECT: Requirement to comply with United Nations and G7 countries sanctions program by Antigua & Barbuda Ships

REFERENCE:

- a) *Antigua and Barbuda Merchant Shipping Act 2006 (as amended)*
- b) [Miscellaneous Circular 2024-002](#) *OFAC Guidance and Best Practices advisory on the Implementation of the Price Cap Policy for Crude Oil and Petroleum Products of Russian Federation Origin*
- c) [Miscellaneous Circular 2022-002](#) *Advisory on Sanctions Risk Related to 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 requirement of Antigua and Barbuda ships to comply with the sanctions program of the United Nations, and G7 Countries. Vessels violating sanctions are liable for deletion from the register.

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 United Nations (UN) and G7 countries use sanctions programs as a strategic tool to achieve political settlement of conflicts, counter terrorism financing, support non-proliferation and achieve their economic, and security objectives without resorting to military force. These sanctions can take various forms, including economic restrictions, trade embargoes, financial freezes, and travel bans.

These sanctions are targeted at:

- Governments of countries engaged in actions deemed hostile, destabilizing, or in violation of international law,
- High-ranking officials, political leaders, and influential individuals linked to targeted activities,
- State-owned enterprises and private corporations linked to activities like shipping, logistics and the transport of goods in support of sanctioned territories, persons or activities,
- Brokers, front companies, and intermediaries that help circumvent sanctions; and
- Vessels linked to sanctions evasion.

Antigua and Barbuda as a member of the United Nations holds in high regard its obligation to implement and enforce United Nations sanctions as part of its legal framework. Further, it is in the interest of Antigua and Barbuda to align with the U.N. and G7 sanctions programs. Compliance helps maintain access to global financial systems, supports economic stability, and protects key industries such as offshore financial services and tourism from unscrupulous actors. It also strengthens diplomatic ties, enhances Antigua and Barbuda's international reputation, and creates opportunities for economic diversification, contributing to long-term development and resilience.

4. OBLIGATIONS AND RESPONSIBILITIES

1. Tanker owners must comply with UN and G7 sanctions programs by conducting thorough due diligence on cargo and counterparties. This includes verifying the origin, destination, and ownership of goods and ensuring all parties involved are not linked to sanctioned entities.
2. Owners must adhere to trade restrictions, ensuring cargo and routes do not breach sanctions, while maintaining accurate documentation such as bills of lading and manifests. Owners must cooperate with the flag administrations and enforcement authorities, respond to inquiries, and maintain detailed records of operations and transactions to demonstrate compliance.
3. Certain activities can trigger suspicion of sanctions violations. These activities must be avoided and include:
 1. Ships that frequently disable or turn off their Automatic Identification System (AIS) and Long-Range Identification and Tracking (LRIT) to conceal their location or voyage details raise red flags, as it prevents authorities from tracking the vessel's movements and destinations.
 2. Conducting STS transfers in areas known for lax oversight, such as in international waters or near sanctioned regions, can indicate attempts to mix sanctioned cargo with non-sanctioned goods to evade detection.
 3. Regularly changing ports or taking circuitous routes to avoid known sanction enforcement points suggests efforts to conceal the ship's final destination or origin of cargo.
 4. Altered or falsified documents, including bills of lading, certificates of origin, or manifests, which misrepresent the cargo's origin, ownership, or destination, can indicate attempts to hide the true nature of the cargo being transported.
 5. Frequent change of flag, ownership, management, name of vessel, and ownership structure is overly complex or opaque and may be used to facilitate sanctions evasion.

4. ADOMS SANCTIONS PROGRAM COMPLIANCE

1. ADOMS uses sanctions screening tools and databases to cross-check the vessel's registration and ownership against international sanctions lists such as those maintained by the U.S. Office of Foreign Assets Control (OFAC), UK, EU sanctions list, and the UN. If any connections to sanctioned individuals, entities, or regions are identified, the vessel's registration can be denied.

2. As a member of Registry Information Sharing Compact between maritime flag states, ADOMS cross-checks the vessel's details with shared global sanctions lists to prevent new vessels from being used for sanctions evasion.
3. NGOs like United Against Nuclear Iran (UANI) use satellite tracking to monitor sanctions violations by tracking vessel movements and identifying evasive tactics like disabling AIS signals or engaging in ship-to-ship (STS) transfers. Satellite data helps detect illicit activities such as unauthorized cargo transfers or suspicious routes. ADOMS regularly initiates an internal investigation to determine the nature and extent of the violation. This may include reviewing the ship's documentation, ownership records, and previous voyage details to establish whether sanctions were intentionally violated.
4. ADOMS monitors AIS and LRIT data to ensure the vessel is not operating in or traveling to sanctioned regions.
5. ADOMS has provided circulars on various sanctions programs and how to comply with the Oil Price Cap regime. Owners are required to comply with these programs.

5. ADOMS POLICY ON NON-COMPLIANT VESSELS

1. If pre-registration compliance checks raise red flags on sanctions compliance by the owner or vessel then ADOMS will decline the registration of the vessel.
2. If during the time the vessel is on the register, credible evidence is available indicating sanctions violation, then ADOMS will initiate an investigation at the cost of the ship owner. If the investigation results in proof of sanctions violation then the vessel will be deleted from the register.
3. If after initial registration, an Antigua & Barbuda registered vessel or its ownership is included in the sanctions database maintained by the UN, USA and G7 countries, the vessel will be deleted from the register.
4. Deregistration will be carried out under the provisions of the Merchant Shipping Act 2006 (as amended).

Issued by

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