

## Ukraine and Russia Conflict



In light of the events unfolding in Ukraine, we have created this dedicated page to address the impact this conflict is likely to have on our Membership and the shipping industry more widely. We hope that the content on this page will help provide guidance to our Members trying to navigate this rapidly evolving conflict. This page will be dedicated to IG and Club updates on the implementation of US, EU and UK sanctions, as well as practical guidance relating to crewing and any claims or legal disputes affected by or arising from the conflict.

### Sanctions and your cover

In view of the fast-changing political crisis in Ukraine and the response taken by major states such as the US, EU and UK (among others), we strongly advise Members to carefully check sanctions lists and ensure there are no sanctioned parties or entities involved in their operations.

Members are reminded that Club cover is subject to the Rules of the Association. Cover may be ceased automatically (Rule 46.3H) or terminated by notice (Rule 45.4) where the Member or the provision of insurance to the Member may expose the Association or its Managers to the risk of being or becoming subject to any sanction, prohibition or adverse action by any State being a

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Major Power or by the United Nations or the European Union. Furthermore, Rule 32 provides a standard exclusion for the right of recovery for liabilities, cost or expenses due to a shortfall which cannot be recovered by the Association from any reinsurer or party to the pooling agreement by reason of sanctions laws and regulations. Similar provisions exist in our plain language policy wordings.

We urge Members to carefully assess the risks involved where their trade has any nexus to Russia, Belarus and/or Ukraine and contact the Club on queries related to the impact of cover.

## Advice

[IMO is issuing relevant circular letters \(CL series 4524\) to provide guidance for Member States, seafarers, shipping companies and other stakeholders.](#)

[IBF Recommendations on the management of the repatriation of seafarers affected by the Russian invasion of Ukraine](#)

[Contractual Implications of the Ukrainian/Russian Conflict – FAQs](#)

[Latest information received from Flag States relating to Ukraine \(Ir.org\)](#)

[Recent Sanctions Updates](#)

[Seafarers' Resources and Helplines](#)

[ISWAN Steps to good mental health](#)

[Frequently asked questions on insurance and reinsurance related matters concerning sanctions adopted following Russia's military aggression against Ukraine](#)

## Updates Timeline

The US, EU, UK among others have introduced a series of sanctions against Russia since their invasion into Ukraine.

The timeline below is intended to help keep track of the sanctions developments, and Members are advised to familiarise themselves on existing and new sanctions.

The information on our webpage is for general guidance only, and is not a replacement for Member's own due diligence. We strongly recommend that Member's carry out their own review of the sanctions that may be applicable, and check the parties involved and the activities they intend to carry out.

23/04/2024

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## [IG Circular: Voyage Attestations and OPC Compliance and Enforcement Alert](#)

Reference is made to Member Circular published on [5 February 2024](#) wherein changes to the Oil Price Cap (OPC) scheme (which regulates the transport and insurance of Russian CN 2709 and CN 2710 cargoes) coming into effect as of 19 February 2024 (UK and US) and for cargoes loaded on or after 20 February 2024 (EU) was described.

05/02/2024

## [IG Circular - Development of Russian sanctions and price cap attestation update](#)

Members should refer to our circular "[The Price on Russian oil and petroleum products](#)" updated on 10 February 2023 for details of the Price Cap scheme which regulates the transport and insurance of Russian CN 2709 and CN 2710 cargoes. Retention and sharing of attestations have been a feature of compliance with the Price Cap scheme since it was introduced. Changes to this attestation model have now been announced.

04/07/2023

## [EU adopts 11th sanctions package of Russian sanctions](#)

On 23 June 2023 the EU Council adopted the [11th package](#) of economic sanctions against Russia to prevent their circumvention and further erode Russia's revenues.

25/05/2023

On 22 May 2023, the UK's Department for Business and Trade published its guidance on trade sanctions circumvention. The notice is intended to create an awareness of key risk indicators and encourages traders to consider the risks of Russia seeking to avoid trade sanctions as part of their ongoing due diligence.

The full guidance is available [here](#).

As a reminder, in March 2023, the US issued a [Compliance Note](#) which provides common red flags that can indicate a third-party intermediary may be engaged in efforts to evade sanctions or export controls.

03/05/2023

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## [IG Circular: Russian Oil Price Cap update – Reporting requirements and evasion alert](#)

The International Group of P&I Clubs has provided an update on the Russian oil price cap regarding reporting requirements and evasion alert.

18/04/2023

## [OFAC alert on evasion of the Russian oil price cap](#)

The Office of Foreign Assets Control (OFAC) issued an alert to warn persons about possible evasion of the price cap on crude oil of Russian Federation origin (Russian oil). It highlights the need to be mindful of the risk of evasion and adopt appropriate due diligence measures to ensure Price Cap Compliance.

03/03/2023

## [U.S. impose further sanctions against Russia](#)

On 24 February 2023, the one-year anniversary of Russia's invasion of Ukraine, the US Department of State and the US Department of Treasury's Office of Foreign Assets Control (OFAC) imposed sanctions on numerous additional individuals, entities and vessels that the US has determined are engaged in sanctions evasion. Full details can be found [here](#).

03/03/2023

## [EU adopts 10th package of Russia sanctions](#)

On 25 February 2023 the EU adopted its 10th package of sanctions against Russia. The relevant EU Regulations and Council Decisions can be found [here](#) but of particular significance for members is [Council Regulation \(EU\) 2023/427](#) which further amends Regulation (EU) No 833/2014.

16/03/2023

[The US Treasury \(OFAC\) and the US Department of Justice issued a joint Compliance note](#) to alert the international community on the use of third-party intermediaries or trans-shipment points to evade Russian and Belarussian related sanctions, and obscure the true identities of Russian end users.

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The Compliance Note provides common red flags that can indicate a third-party intermediary may be engaged in efforts to evade sanctions or export controls.

10/01/2023

### [Price Cap on Russian Oil – Podcast](#)

Following the IG Circular issued on our website on 9 December 2022, the Club's Legal Team has recorded this podcast to provide Members with a snapshot of the Price Cap on Russian oil that came into effect on 5 December 2022.

21/12/2022

### [EU adopts 9th package of Russia sanctions](#)

On 16 December 2022 the EU adopted the 9<sup>th</sup> package of Russian sanctions. A number of Regulations and Decisions were published (full details can be found [here](#)) but of particular significance for members is Council Regulation (EU) 2022/2474 which further amends Regulation (EU) 833/2014 (the Regulation).

12/12/2022

The EU, UK and US guidance and FAQs on the Oil Price Cap is available through the following links below. See also our IG circular issued on Friday 9 December 2022.

[Questions and Answers: G7 agrees oil price cap to reduce Russia's revenues, while keeping global energy markets stable](#)

[Oil Price Cap Update – OFSI \(blog.gov.uk\)](#)

[Guidance on Implementation of the Price Cap Policy for Crude Oil of Russian Federation Origin; Publication of Russia-related Determination; Issuance of Russia-related General Licenses](#)

09/12/2022

### [IG Circular: The Price Cap Russian on Oil – Executive Summary](#)

Legislation and guidance giving effect to the Price Cap Scheme has recently been published by

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the European Union, the United Kingdom and the United States and this circular describes the impact of the scheme on shipowners, charterers and cover for such trades by the International Group of P&I; Clubs and its reinsurers.

02/11/2022

[IG Circular: EU sanctions – updated FAQs published by the EU on the carriage of certain Russian cargoes including coal and fertilisers](#)

10/10/2022

[EU adopts 8th sanctions package against Russia](#)

The EU adopted an eighth package of sanctions on 6 October 2022 in response to Russia's continued military aggression against Ukraine.

21/09/2022

[IG Circular – Update September 2022 – EU sanctions – clarification published on the carriage of certain Russian cargoes including coal and fertilisers](#)

On 19 September 2022 the EU further amended its FAQs clarifying the application of provisions relating to the carriage of certain cargoes from Russia, including coal and other solid fossil fuels as well as certain types of fertilizer.

12/08/2022

[IG Circular – EU sanctions – clarification published on the carriage of certain Russian cargoes including coal and fertilisers](#)

On 10 August 2022 the European Union (EU) published updated FAQs clarifying the application of provisions relating to the carriage of certain cargoes from Russia, including coal and other solid fossil fuels as well as certain types of fertilizer. As this Circular sets out, these clarifications will have a significant impact on the carriage of these commodities by EU entities and the provision of insurance for carriage to any entity regardless of their domicile.

02/08/2022

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## [UK Sanctions – New Trade Restrictions](#)

The new restrictions include a ban on the import of Russian oil and coal into the UK and the export of key industrial goods to Russia. It also expands existing restrictions in relation to the provision of energy-related goods and services to Russia.

29/07/2022

## [IG Circular: The European Union's 6th Sanctions Package – Amended Circular](#)

On 21 July 2022 the European Union published a Maintenance and Alignment Package. The package included amendments to Regulation (EU) No. 833/2014 which amongst other things clarified the circumstances in which the exceptions contained in Article 5 (aa) (3) may apply.

19/07/2022

## [UK adopts further Russian sanctions](#)

The UK has introduced amendments to its Russia Regulations, which impose prohibitions and requirements in relation to trade sanctions measures.

14/07/2022

## [The UK Government announces further sanctions against Belarus and amendments to existing measures](#)

On 5 July 2022, the UK government introduced a new tranche of economic, trade and transport sanctions on Belarus in response to Lukashenko's support of Russia's invasion of Ukraine. These sanctions expand on the existing measures introduced against Russia to Belarus.

01/07/2022

## [IG Circular: The European Union's 6th sanctions package – EU Regulation 833/2014 – \(The "Regulation"\)](#)

On the 3 June 2022 the EU published its 6<sup>th</sup> package of sanctions against Russia. This circular is not intended to be a comprehensive summary of the EU sanctions against Russia.

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01/06/2022

On 31 May 2022, the EU announced its 6<sup>th</sup> package of EU sanctions, which focuses on crude oil and petroleum products imported from Russia to EU Member States, with a temporary exclusion for crude oil delivered by pipeline to Hungary, Czech Republic and Slovakia. Sea-going imports of Russian crude oil into the EU are therefore prohibited. This agreement in principle means that 75% of Russian oil imports into the EU will be targeted, with 90% of imports covered by the end of 2022.

Members should be aware that included within the announcement is a ban on EU insurance and reinsurance of vessels carrying Russian crude oil. It has also been reported that the UK government are expected to announce a similar prohibition shortly.

10/05/2022

### **US sanctions against Russian maritime sector**

On 8 May, the US imposes further sanctions targeting Russian maritime companies and a number of associated vessels, which are alleged to have assisted with the resupply of Russian troops and the continued occupation of Crimea. The list of sanctioned shipping companies includes:

1. Oboronlogistika;
2. SC South LLC, which is a subsidiary of Oboronlogistika;
3. Northern Shipping Co, including 27 of their vessels;
4. Transmorflot, including 16 of their vessels;
5. M Leasing LLC;
6. Marine Trans Shipping LLC; and
7. Nord Project LLC Transport Co.

Further details can be found in Executive Order 14024, which is available on the US State Department website

(<https://www.state.gov/state-department-actions-to-promote-accountability-and-impose-costs-on-the-russian-government-for-putins-aggression-against-ukraine/>)

10/05/2022

### **UK imposes new trade sanctions**

On 9 May, the UK announced a new package of trade sanctions. The sanctions focus on two



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key areas:

1. New import tariffs on platinum and palladium; and
2. Planned export bans intended to hit more than £250 million worth of goods in sectors of the Russian economy most dependent on UK goods, including certain chemicals, plastics, rubber and machinery.

A copy of the press release can be found here – [UK punishes Putin with new round of sanctions on £1.7 billion of goods – GOV.UK \(www.gov.uk\)](#)

06/05/2022

On 4 May 2022 the EU adopted a sixth package of sanctions against Russia. Whilst many of the measures are unlikely to impact the shipping industry, we want to draw Members' attention to the following provisions:

- The removal of Sberbank, Russia's largest bank, and two other major banks from the SWIFT system; and
- An import ban on all Russian oil products.

The EU has been grappling with the issue of dependency on Russian energy, but particularly Russian oil. This sixth package of sanctions provides that Russian crude oil will be phased out within 6 months and the import of refined products by the end of 2022. This will bring the EU into line with the US, who banned the import of Russian oil in March.

08/04/2022

[EU Commission announces the fifth package of sanctions against Russia](#)

07/04/2022

[Russia adopts retaliatory measures in response to sanctions imposed by various States](#)

31/03/2022

[Latest US Russia sanctions](#)

30/03/2022

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[UK introduces further Russia sanctions measures](#)

30/03/2022

[Black Sea: mine risks](#)

18/03/2022

[EU imposes further sanctions on Russia](#)

17/03/2022

[Department for Transport – Maritime Sanctions against the Russian Federation – Guidance for UK Ports – Version 3](#)

10/03/2022

[Singapore imposes sanctions against Russia](#)

[Update on Russian Sanctions – Oil and Gas](#)

04/03/2022

[Ukraine – Repatriation of Ukrainian Seafarers](#)

[EU Regulation 2022/328](#)

[Russian Banks Banned from SWIFT](#)

02/03/2022

[Wilhelmsen – Ukraine-Russia Port Situation Map](#)

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01/03/2022

[UK Port Restrictions – Russian Vessels](#)

25/02/2022

[Update on Russian Sanctions – 25 February 2022](#)

23/02/2022

[Update on Russian Sanctions – 23 February 2022](#)

11/02/2022

[New UK Russian Sanctions Powers](#)

03/02/2022

European Sanctions: [“If Russia invades Ukraine...” sanctions webinar recording](#)