

## INSIGHT: RUSSIA, TANKERS AND SANCTIONS

The pace and complexity of changes to the global regulatory market for shipping and trade demands that both investors and stakeholders managing supply chain risks are equipped and agile in response to these dynamic and shifting requirements.

Underwriters must go beyond labels and surface-level sanctions checks and undertake proper research into activities and affiliations, analysing vessel behaviour, affiliations, and past voyages. Simply relying on a 'dark vessel' list isn't enough. The combined insights from technology and tracking solutions like Ambrey and Insurwave's provide insurers with the deeper intelligence needed to make informed decisions, ensuring they truly understand the risks they're asked to write.

### Introduction

Ambrey assesses the realistic number of vessels at risk of sanctions investigation and designations is almost two times larger than the "dark/shadow fleet."

Ambrey conducted a comparative study of vessels in the "dark/shadow fleet" and others calling two major Russian crude oil exporting ports over last six months.

### Context

The United States implemented multiple rounds of sanctions against Russia in response to Russia's renewed invasion of Ukraine. These measures included imposing restrictions on Russian oil and gas. In collaboration with the G7, EU, and Australia, a price cap of \$60 per barrel was set for Russian oil in December 2022. Sanctions targeted companies and vessels involved in shipping Russian oil above the price cap, aiming to prevent evasion. The sanctions regime continued to expand, culminating in January 2025. The latest sanctions included 183 tankers which were characterised by the US as a part of the "dark/shadow fleet".

Whilst the dark/shadow fleet terminology is debated, Ambrey's research indicates that the scale of the dark/shadow fleet represents only a third of Russian crude oil exports. All tankers calling Russian crude oil export facilities have realistic worst case scenario exposure to sanctions investigations.

### Analysis

Ambrey has conducted research on the potential number of tankers at risk. To do this, Ambrey performed comparative analyses of vessels labelled by the market as "shadow/dark fleet" with those that were not but had called Russian crude oil terminals at Ust-Luga and Novorossiysk. These two ports account for a sizeable portion of Russian seaborne crude oil exports. Over six months in 2024, 125 tankers were "shadow/dark fleet", and 246 tankers were not. Ambrey considered the following variables.

- **AIS behaviour:** Ambrey detected significant AIS outages and/or disruption in the Ionian Sea and Laconia Bay amongst the "shadow/dark fleet". Almost all these tankers studied showed AIS points missing in these areas. Of the sample of those not labelled "shadow/dark fleet", speed analysis indicated that 17% were in these areas after loading in these Russian export terminals for sufficient periods of time to have conducted STS. There were other parts of the world in which AIS disruption was observed and could be related to similar operations. This could indicate that the designations are presently focused in areas where local authorities are more likely to cooperate with the US sanctions investigations.
- **Age:** The average age of "shadow/dark fleet" vessels in the study was 18 years. There was no significant difference in the age of tankers that called the Russian ports and were not labelled "shadow/dark fleet". This indicated that the market led criteria of age of the labelled tankers is not a strong indicator.

- **Flag:** Ambrey's analysis of the "shadow/dark fleet" indicated that 18 flag registries had a third or more of their total tanker fleet designated. Of those not, 6% shared these flag registries. However, 69% of the tankers that also called these ports and were not labelled "shadow/dark fleet" flew a flag of convenience. A further 20% flew the Russian flag. This indicates that the sanctions investigations have focused on a few registries, and it is unlikely a strong indicator of sanctions evasion.
- **Port calls:** Ambrey identified nine elevated-risk ports in Asia through an analysis of "shadow/dark fleet" vessel movements loading in Ust-Luga and Novorossiysk. 31% of the other vessels called the same ports.

## Implications

Ambrey found that nearly one-third of the tankers studied calling Ust-Luga and Novorossiysk ports over the six months were "shadow/dark fleet" at the time of the analysis. At the time of writing, the total number of "shadow/dark fleet" was estimated to comprise approximately 800 tankers. This research suggested that the actual number of tankers at risk of sanctions investigations could be significantly higher. Based on Ambrey's sample, and particularly flags and trading behaviour, this could reasonably be estimated to be between 1050 to 1400 vessels. This highlights the need for holistic asset screening assessments to identify chartering and purchasing risks of possible sanctions-evasion activities, as established definitions could benefit from an increased scope, and further critical analysis of the relevancy of criteria.