

# **ITALIAN COMPLICITY AND ECOLOGICAL RISKS OF OIL EMBARGO VIOLATIONS**

**Thomas Simon Mattia and Greenpeace Italy Investigation Unit  
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## **Content**

- Introduction
- The Russian shadow fleet moves off Augusta
- The ecological risk
- Espionage, sabotage and sanctioned ships
- Italian complicity
  - The Italian ship classification society RINA Spa
  - Italian ships join the shadow fleet
  - Sanctioned ships dock in Italy
- The role of Libya
- The old port of Benghazi
- The MV Nobel and the “storage ghost ships”
- Conclusions
- Appendix

## **Summary**

- Since mid-2024, a large part of the ship-to-ship (StS) activities (transferring oil cargoes from one ship to another offshore to circumvent sanctions) of the so-called Russian shadow fleet were relocated off the Gulf of Augusta, in Sicily;
- These activities pose a significant environmental risk: 36% of the oil and derivatives traded from ship to ship in the waters off the Gulf of Augusta were handled by old vessels that did not possess adequate insurance cover for spill damage;
- In addition to the ecological risk, the presence of the shadow fleet off the coast of Augusta - where several submarine telecommunications cables terminate and one of the Italian Navy's three arsenals is located - also poses a risk to maritime safety and national security. A ship, now seized by Finnish authorities on suspicion of sabotaging submarine cables in the Baltic Sea, which reportedly also spied on the NATO fleet on behalf of Russia, had previously been sailing in circles in the Gulf of Augusta for a month.
- With some exceptions, access to EU ports is prohibited for ships that have changed from the Russian flag to that of another country after February 24, 2022. However, two ships already sanctioned for this reason docked in an Italian port and apparently unloaded, while other two ships were allowed to dock even though they had just engaged in a StS-transfer with ships suspected of evading sanctions. In all four cases, the ships were apparently not subjected to the appropriate checks by the Italian authorities, as required by European and international regulations.
- A number of Italian companies active in maritime transport act for the benefit of the Russian shadow fleet: RINA Spa continues to provide services to the ships of the shadow fleet, some of which were owned by Italian shipowners until recently. The provision of technical assistance services or the sale of vessels to entities linked to the Russian shadow fleet are both activities prohibited by European regulations;

- Fuel smuggling in Libya occurs on a much larger scale than previously known and is linked to the illegal trade in sanctioned Russian oil and derivatives. Several ships that make themselves untraceable in the areas where Libyan smuggling operations occur then unload in Italian ports without being inspected by the port authorities. This is in breach of international regulations that provide for inspections of ships that have had their tracking systems deactivated for long periods of time.

## Introduction

In response to Western sanctions against Russian oil, Moscow sought alternative markets for its exports and deployed a “shadow fleet” to circumvent Western restrictions. This shadow fleet allows Russia to circumvent the embargo and the oil price cap set by the G7/EU countries and thus finance the war in Ukraine. The activities of the shadow fleet also multiply the risk of accidents leading to oil spills, which can cause an environmental disaster with enormous economic costs for the coastal countries concerned, as already highlighted by Greenpeace in the case of the German Baltic Sea coast.<sup>1</sup> In the last two years, the volume of Russian crude oil transported by the shadow fleet has increased exponentially and now accounts for 70 percent of total Russian exports by sea. According to the Centre for Research on Energy and Clean Air (CREA), three shadow tankers leave Russian ports every day.<sup>2</sup>

With this investigation, Greenpeace Italy sought to shed light on Italy’s responsibility for this worrying phenomenon and investigate any omissions, complicity or violations on the part of the government<sup>3</sup>, port authorities or other local private entities. We began by analyzing vessel traffic data (AIS) and satellite imagery to identify ship-to-ship (StS) transfers off the Gulf of Augusta involving shadow fleet vessels. A ship-to-ship transfer is a maritime operation in which cargo is transferred between two ships that are berthed side-by-side or at sea. This relatively common practice is increasingly being used to circumvent the sanctions imposed on Russia by the EU and the G7.<sup>4</sup> These opera-

tions make it possible to disguise the true origin of the traded goods, which become increasingly more difficult to trace as they move from ship to ship.

As part of the Western sanctions, which provide for a complete embargo on Russian oil transported by sea, the countries of the EU, the G7 and Australia are prohibited from importing oil and many of its derivatives if they are of Russian origin.<sup>5</sup> At the same time, these countries are prohibited from providing technical assistance, brokering services and financial support to companies involved in the transportation of Russian oil by sea, except in cases where the traded product has been purchased below a certain ceiling (\$60 per barrel in the case of crude oil). Finally, it is prohibited to knowingly engage in activities carried out with the aim of circumventing the imposed sanctions, including StS operations aimed at “laundering” Russian oil or allowing a cargo originating from a sanctioned vessel to continue its journey<sup>6</sup>. In this way, sanctioning countries seek to deprive the Russian government of the oil profits that contribute to the war effort in Ukraine.

The so-called Russian shadow fleet - also known as the Russian dark fleet - is a media term that refers to an informal grouping of vessels transporting oil and derivatives that are systematically used to circumvent the sanctions imposed on Russia. Due to the Western ban on services for suspect vessels, these ships often lack adequate insurance and in many cases are old and in poor condition. They usually sail under the flags of states that are unwilling or unable to enforce international regulations.

The International Maritime Organization (IMO) considers a ship to be part of the shadow fleet if - with the aim of evading sanctions - it carries out risky operations in disregard of good industry practice, evades inspections ordered by port and flag authorities, is not adequately insured, is managed by anonymous or opaque organizations that do not ensure the safety of the environment and people on board, takes measures to prevent its detection, or conceals its true position<sup>7</sup>.

## EU sanctions

The EU sanctions against Russian oil prohibit “the purchase, import and transfer of seaborne crude oil and certain petroleum products from Russia to the EU”. There is a temporary exception for crude oil imports via pipelines to EU member states that “suffer from a specific dependence on Russian supplies and have no viable alternative options”. The ban applies to 90% of Russian oil imports into the EU<sup>8</sup>.

The ban on transportation by sea and the provision of related services (technical assistance, brokering or financial support) is suspended if these goods are destined for third countries and are purchased at the maximum price or below, which is currently USD 60 per barrel for crude oil.

The sale of vessels to entities associated with the Russian shadow fleet is also prohibited,

as is the docking of Russian-flagged vessels in European ports (or vessels that previously sailed under the Russian flag and were reflagged after February 24, 2022, the date of the Russian invasion of Ukraine)<sup>9</sup>, except for ad hoc exceptions approved by the authorities.

The European Council has also introduced measures for certain ships linked to the war against Ukraine, which are subject to a ban on ports and services. The ships can be designated for a variety of reasons and include vessels from the Russian shadow fleet. To date, the EU has listed 153 oil tankers proven to be involved in the transportation of Russian oil and in dangerous and illegal practices<sup>10</sup>.

Other Russian fossil fuels such as gas or liquefied natural gas (LNG) are not covered by a full EU embargo.

## Origin of the Oil Cargo

The EU sanctions pertain to Russian oil exports, but not automatically to all oil exports from Russian ports. This depends on the infrastructure available in individual ports. For example, in the Russian port of Novorossiysk, there are two terminals managed by CPC and SOCAR. CPC is fully owned by the state of Kazakhstan and SOCAR partly owned by the state of Azerbaijan. A ship that loads crude oil from the CPC terminal, for instance, is authorized to unload its cargo in Europe since the oil it transports, although exported through Russia, originates from Kazakhstan. Other Russian ports have either infrastructure shared with third countries not targeted by sanctions, or terminals for so-called “transshipment.” These terminals have large tanks for storing oil and petroleum

products, used to “park” cargoes originating from other countries until they are re-exported elsewhere. Thus, oil exports from some Russian ports do not necessarily involve Russian oil subject to sanctions, making it more difficult to intercept actual Russian smuggling. However, if the parties involved in the commercialization of a cargo implement measures to obscure its real origins, then illicit trafficking can indeed be suspected. This is particularly true for refined petroleum products which, unlike crude oil, do not have a different chemical structure depending on their geographic origin but are synthetic in nature, allowing different loads to be mixed without altering the overall quality of the cargo. For this reason, it is particularly easy to validate a legitimate certificate of origin, issued for only part of the cargo, for the entire load of refined petroleum products delivered.

# Russian shadow fleet moves off Augusta

Until mid-2024, part of the Russian shadow fleet's StS activities were concentrated in the southern Mediterranean, particularly in the Laconian Gulf, on the edge of Greek territorial waters. The reason for this is that the very delicate and risky operations<sup>11</sup> must be carried out in sea areas protected from the wind and with particularly favorable weather conditions. The Laconian Gulf is of strategic importance as it lies at the crossroads between the Russian Black Sea ports, where many of the cargoes whose tracks are covered by the StS transfers originate, and the Suez Canal, an important hub for maritime trade. The Gulf offers protection from bad weather, and the waters within it are often calm. These are the reasons why the Laconian Gulf was such a popular destination for ships engaging in StS<sup>12</sup> operations.

In early May 2024, the Greek Navy began broadcasting a message via the NAVTEX system (see Figure 1). NAVTEX is a system for transmitting navigation and weather warnings, as well as urgent safety information to ships. In their message, the Navy declared the Laconian Gulf as an exclusive training area and requested all

present ships to leave the area.<sup>13</sup> This was Greece's response to public pressure arising from the environmental threat posed by the shadow fleet in the Laconian Gulf. Within a short time, the ships found alternative locations for ship-to-ship (STS) transfers, including the waters off the Gulf of Augusta in Sicily.<sup>14</sup> This location, like the Lakonikos gulf in Greece, offers good wind and weather conditions due to its geographical position.

```
ZCZC QA64
081000 UTC MAY 24
IRAKLION AR.MIN. STATION 391/24
SOUTH-EAST PELOPONNESE
LAKONIKOS GULF
NAVAL EXERCISES
FROM 091500 UTC TO 191600 UTC 24 MAY
IN THE AREA BOUND BY THE FOLLOWING POINTS:
36 40.70 B – 022 40.60 A
36 33.40 B – 022 48.90 A
36 23.10B – 022 49.90A
36 23.00 B – 022 35.00 A
36 32.90 B – 022 34.90 A
AVOID CROSSING THE AREA INDICATED ABOVE
MESSAGE CANCELED AT 191700 UTC 24 MAY
NNNN
```

Figure 1: Example of a NAVTEX message transmitted by the Greek navy.<sup>15</sup>

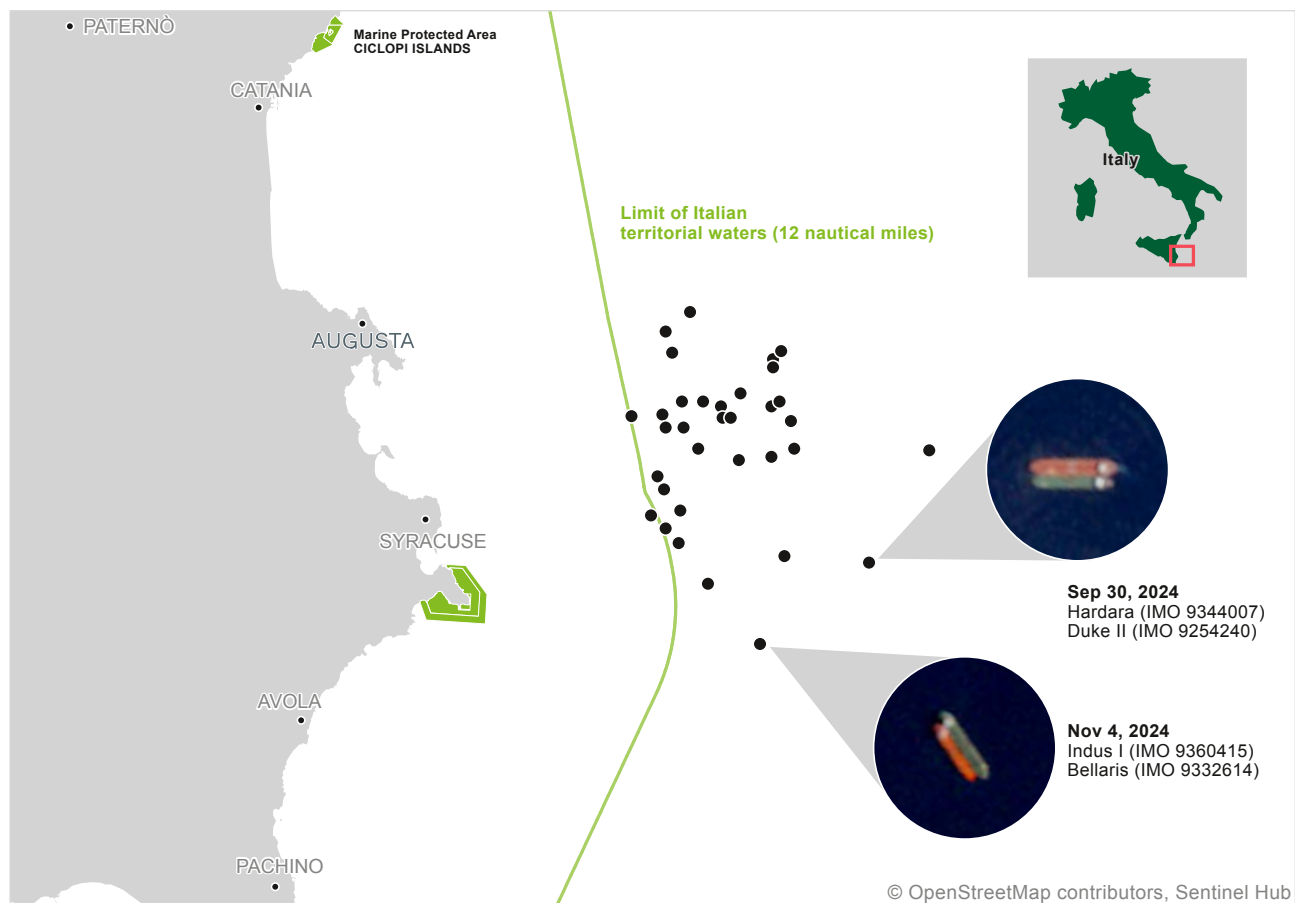


Figure 2: The map shows the locations of the StS transfers identified and analysed in the investigation.



This research sheds light on the activities of the shadow fleet off Augusta in 2024. To identify ship-to-ship (StS) transfers near Augusta, Greenpeace evaluated satellite images (Sentinel-2) from January to November 2024, which were accessed via the Copernicus Hub. Through this approach, a sample of 33 StS operations were identified (see Figure 2).

By comparing the images with ship movement data (AIS) from MarineTraffic, it was possible to identify the ships involved in these operations: 52 in total (see detailed list in the appendix). Out of these 52 ships, nine (17%) are not registered in the IGP&I registers - a group that brings together the major insurance companies that together insure 90% of the world's operating ships - and therefore most likely lack adequate cover for spills. Five (9%) carry flags that are blacklisted by Tokyo MoU - an international organization that regularly updates a ranking of the flags most commonly carried by ships sailing in the worst safety conditions. The same organization's grey list includes flags carried by a further six ships (11%) in the sample. A further ten (19%) carry a flag included in the grey list of Paris MoU, the European equivalent of Tokyo MoU. The crews of 17 of the ships surveyed (32%) do not enjoy adequate union protection, according to International Transport Workers' Federation records. In addition, eight (15%) of the ships surveyed are over 20 years old, while 23 (44%) are between 15 and 20 years old. The average age of the vessels identified is 15 years - two years older than the average age of the global fleet<sup>16</sup>. After 21 years, oil tankers enter a phase of obsolescence, where the likelihood of leaks increases due to wear and tear, outdated equipment and mechanical problems. After 22 years, an oil tanker is usually scrapped<sup>17</sup>. Our analysis of the individual vessels identified off Augusta revealed that 11 (21%) are probably or certainly part of the Russian shadow fleet (see table below).

The risky STS (ship-to-ship) operations involving partially old and poorly insured ships do occur in international waters, but these are not far from the Italian coast. For example, the StS operation between the vessels ROCK (IMO 9288356) - identified as part of the Russian shadow fleet - and FLAMENCO (IMO 9411991) took place on the 4th of November 2024 just 300 meters from the 12 nautical mile limit off the Italian coast. Two days earlier, another transfer took place between the ROCK and the vessel IBLEA (IMO 9244441) at a distance of 400 meters from the same boundary. Of the observed cases, one was detected within Italian territorial waters: This occurred on February 8, 2024, when the vessels DING HENG 45 (IMO 9330795) and EVA GOLD (IMO 9888132) carried out a StS transfer within our territorial waters.

## The ecological risk

The lack of adequate insurance for many of the identified vessels exacerbates the risk that characterizes the StS operations in which they participate. The devastating impact that oil spills can have on the environment is well known<sup>18</sup>, as is the particular sensitivity of the ecosystem affected by this risk (think of the Plemmirio Marine Protected Area, not far from the Gulf of Augusta, and the various breeding grounds of different marine species in its vicinity). As if that were not enough, the Russian shadow fleet, precisely because it has limited access to insurance, consists mainly of vessels of very low value in order to minimize the financial risk of shipowners without effective insurance<sup>19</sup>. These are old ships, often in poor condition, which are poorly maintained due to their low value<sup>20</sup>. As we will see later, it is not surprising that many of these ships try to avoid the inspections required by international regulations.

In the sample of StS operations off Augusta analyzed by Greenpeace, it is estimated that a total of up to 5.24 million tons of oil and oil derivatives were traded<sup>21</sup>, of which 24% (1.26 million tons) between pairs of vessels at least one of which was identified as part of the Russian shadow fleet, and 36% (1.9 million tons) between pairs of vessels at least one of which is not properly insured<sup>22</sup>.

The environmental risk associated with the illegal trade in sanctioned oil is very high, and so far only good fortune has prevented the worst from happening. The PABLO (IMO 9133587) - believed to be part of the Russian shadow fleet - exploded off Malaysia in March 2023 after offloading sanctioned oil in China just days earlier<sup>23</sup>. The ship was uninsured, and had it still been loaded at the time of the explosion, there could have been an oil spill of 700,000 barrels, an environmental disaster for which no insurance company would have been willing to provide the funds necessary to contain the consequences. In turn, in March 2024, the ANDROMEDA STAR (IMO 9402471), part of the Russian shadow fleet, collided with another ship off the Danish coast while heading for a Russian port in ballast (i.e. with empty holds but with water taken on board to improve stability)<sup>24</sup>. The risk of such incidents has increased due to the growing presence of Russian ships in the busy straits of the Baltic Sea<sup>25</sup>, and even then, the environmental disaster was only avoided because the ship had no crude oil or derivatives on board at the time of the collision.

The case of the EVENTIN (IMO 9308065), which suffered a power failure on board on January 10, 2025 and

was adrift in the Baltic Sea north of a German island, shows just how precarious these ships are. The ship, recently sanctioned by the EU<sup>26</sup>, was sailing in such poor weather conditions that a German rescue team had to come to its aid (see figure 3). After several hours, the ship was brought to safety, to the relief of Germany, which would probably have had to fund the necessary efforts to contain a possible oil spill, should it have occurred, given the ship's inadequate insurance cover<sup>27</sup>. According to a European Parliament report, there have already been more than 50 accidents involving the Russian shadow fleet<sup>28</sup>.

## Espionage, sabotage and sanctioned ships

The STS transfers off the coast of Augusta examined in this investigation pose not only environmental risks but potentially also risks to national security. The case of the EAGLE S (IMO 9329760) illustrates this: The vessel EAGLE S (IMO 9329760) was detained in Ghana in September 2023 after several safety deficiencies were found on the vessel during an inspection. The inspection by the Tema port authorities found oil leaks from the auxiliary generators, non-functioning fire alarms and pumps, and crew toilets in “deplorable conditions”, among other issues<sup>29</sup>. The inspection revealed that the pollution prevention regulations had not been fully adopted on board the EAGLE S, and the ship has since attempted to circumvent inspections. In July 2024, in the middle of a voyage, the ship applied for a transfer

from the American Bureau of Shipping to the Indian Register of Shipping, an unusual move that allowed it to avoid an unscheduled inspection<sup>30</sup>. Shortly beforehand, espionage equipment had been found on board the ship that was apparently of Russian and Turkish origin<sup>31</sup>. On December 26, 2024, the EAGLE S was seized by the Finnish authorities on suspicion of sabotaging the EstLink 2 high-voltage submarine cable<sup>32</sup>. The vessel is 18 years old, flies the Cook Islands flag - blacklisted by Tokyo MoU and gray-listed by Paris MoU - has not been publicly inspected since September 2023<sup>33</sup> and is not adequately insured<sup>34</sup>. Our investigations have revealed that the espionage practices of the EAGLE S may have been replicated in Italian waters. In fact, from January 14 to February 13, 2024, the ship was in fact off the coast of Augusta, apparently sailing in circles, in an area that hosts one of the three active arsenals of the Italian Navy<sup>35</sup> and as many as 6 submarine telecommunications cables<sup>36</sup> (see figure 4). After a month-long odyssey off the coast of Augusta, the EAGLE S had an StS transfer with the ship MINERVA PISCES (IMO 9410179).



Figure 3: The EVENTIN during the tug operation off Rügen in January 2025.

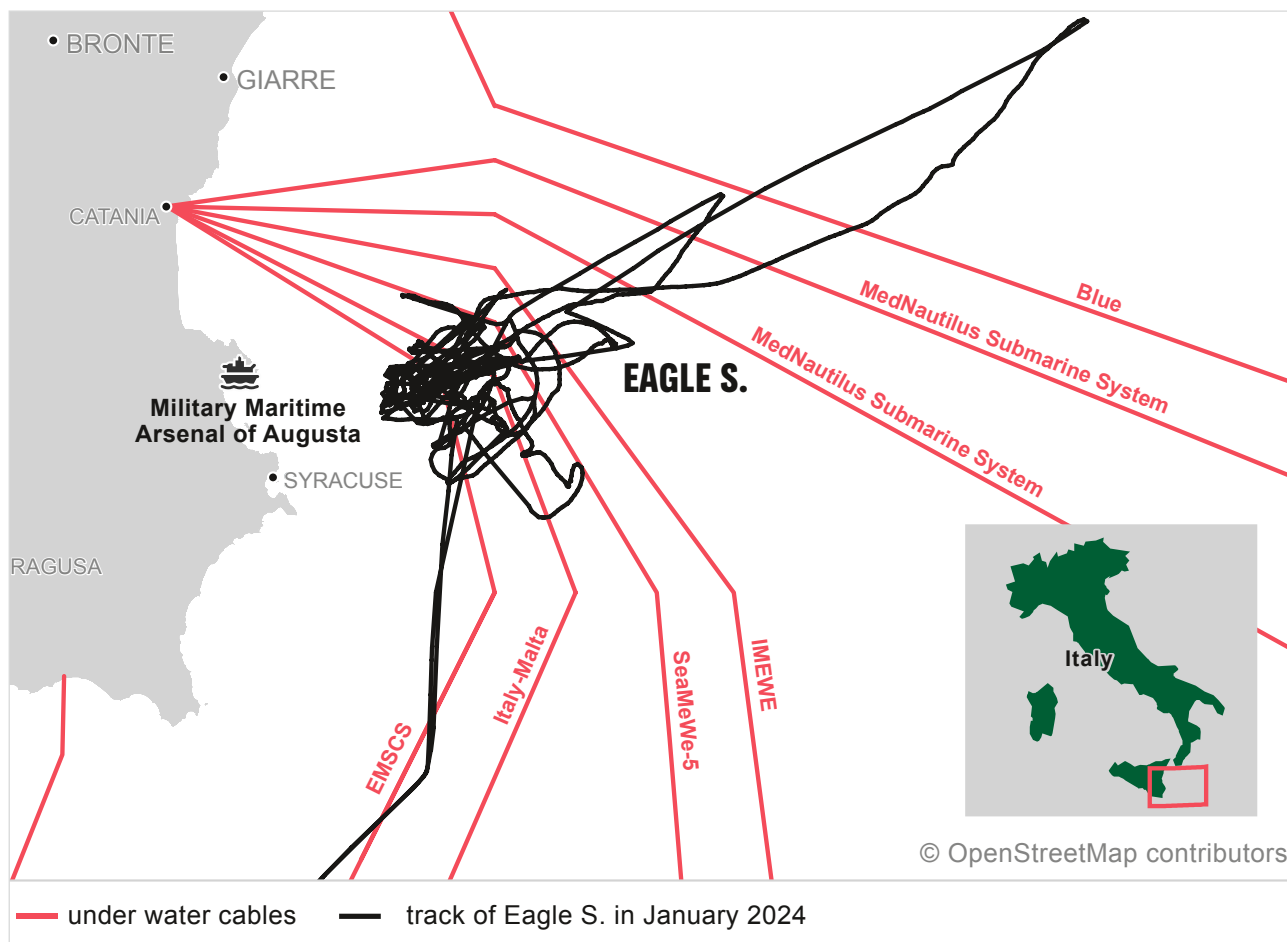


Figure 4: Track of the EAGLE S. in January 2024.

Another ship involved in STS transfers off the coast of Augusta last year is the Ji Xiang (IMO 9384459). On May 28, 2024, it conducted an STS transfer with the ship MARTA 1 (IMO 9323974). At the time of the transfer, the Ji Xiang was owned by Acheon Akti Navigation. This company also owned the freighter RHOSUS (IMO 8630344) when it made headlines for its role in the devastating explosion in the port of Beirut in 2020.<sup>37</sup> At the time of the transfer, the Ji Xiang was not adequately insured<sup>38</sup>, and had not been inspected since August 2022<sup>39</sup>. The vessel was previously linked to Sovcomflot, Rosneft, and Gatik<sup>40</sup>, all companies that play a key role in the illicit Russian oil trade.<sup>41</sup> Today, the statutory classification and certification of the ship are in the hands of the Russian Ship Registry, making it a sanctioned vessel under European law.<sup>42</sup>

# Italian complicity

## The Italian ship classification society RINA Spa

Greenpeace's investigations have revealed that the Italian ship classification society RINA Spa - 70 percent of which are owned by the Registro Italiano Navale, whose board of directors includes two members appointed by the Ministry of Infrastructure and Transport<sup>43</sup> - does not carry out adequate due diligence when confronted with a ship that may belong to the Russian shadow fleet. As mentioned above, existing sanctions prohibit European companies from providing services to vessels suspected of conducting StS operations in order to circumvent sanctions<sup>44</sup>. In line with this, other ship classification and certification companies such as Det Norske Veritas, American Bureau of Shipping and Lloyd's Register have pledged to discontinue the provision of services to ships suspected of being part of the Russian shadow fleet and have withdrawn their ship class certification<sup>45</sup>. RINA Spa, which is tasked with inspecting the safety of its clients' vessels and providing other services to their owners where necessary, continues to provide services to some vessels that are part of the Russian shadow fleet.

Among the vessels classed by RINA Spa<sup>46</sup> is the MARTA 1 (IMO 9323974), which our investigation found to have played a central role in the illicit trade in Russian oil and derivatives off Augusta, an unprecedented detail brought to light for the first time by Greenpeace Italy. The ship is 18 years old, inadequately insured<sup>47</sup> and flies the Panamanian flag, which is on the Paris Agreement's gray list. According to our research, the vessel acts as a "storage vessel", spending most of its time anchored off Malta awaiting StS. According to Marine Traffic data, the vessel did not call at any port in 2024 and was never inspected during this period.<sup>48</sup> The vessel loads and unloads crude oil - or more likely oil products<sup>49</sup> - from vessels in the Russian shadow fleet, such as the aforementioned JI XIANG. A StS with the JI XIANG that took place off the coast of Augusta on May 28, 2024, in fact, makes the MARTA 1 one of the ships subject to European sanctions, which prohibit vessels, which are participating in StS transfers with others suspected of violating sanctions, from accessing EU ports before having unloaded the suspicious cargo elsewhere<sup>50</sup>. According to Marine Traffic data, MARTA 1 conducted 115 StS transfers from January to November 2024, including 26 off Augusta. It conducted 14 StS transfers with vessels that had just loaded at Russian ports, mostly in St. Petersburg (in 7 cases)<sup>51</sup>.

The links between the MARTA 1 and the Russian shadow fleet are revealed by an in-depth analysis of the ship's ownership carried out by Greenpeace (see figure 5). MARTA 1 belongs to an anonymous company registered in the Seychelles<sup>52</sup>, which has the same address - identical down to the floor and room number - as the company BERYL MARINE INC. **Marine Traffic identifies its beneficial owner as** MEGGER MARINE SOLUTIONS FZE, another anonymous company registered in the United Arab Emirates. The latter, in turn, has the same address - identical to its office number - as MAPLE MARITIME SOLUTIONS FZE, **which Lloyd's List Intelligence<sup>53</sup> links to the fleet inherited from** GATIK SHIPMANAGEMENT, **the Indian company that vanished into obscurity after media reports exposed its 53-vessel fleet, all used for illicitly transporting sanctioned Russian oil.**<sup>54</sup>.

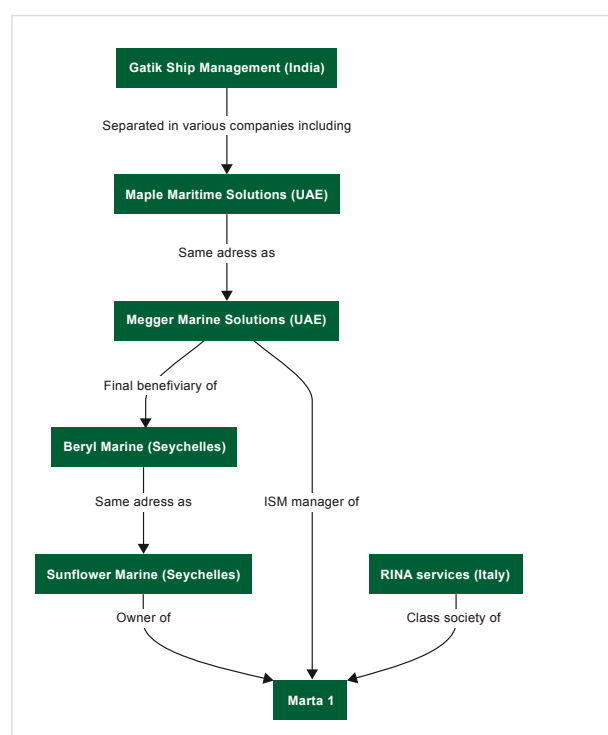


Figure 5: MARTA 1 ship ownership and management scheme reconstructed by Greenpeace.

In addition to the MARTA 1, the HORAI (IMO 9290517) (which conducted a StS with the MARTA 1 on April 4 after loading cargo in St. Petersburg) is also classed by RINA Spa<sup>55</sup>. The vessel is 19 years old, flies the flag of Gabon - which is on the black list of the Tokyo MoU - and was operated directly by Gatik Ship Management and Caishan Ship Management.<sup>56</sup> The operations of Caishan Ship Management resemble those of Maple Maritime Solutions FZE. Since the activities of Gatik Shipmanagement became known, these two companies appear to be continuing Gatik's operations.<sup>57</sup> The vessel conducted a StS transfer with the vessel EPIK (IMO 9273832) off Augusta on July 27, 2024.



## Italian ships are included in the shadow fleet

According to investigations by Greenpeace Italy, major players in the Russian shadow fleet have bought ships that until recently belonged to the Italian family of shipowners Brullo, who have already made headlines in the past for their involvement in the controversial sinking of the NUOVA ISIDE<sup>58</sup>. The ship LISCA BIANCA M (IMO 9290517), which previously belonged to the Brullos, is now named HORAI and, as already described, is part of the Russian shadow fleet. Until February 16, 2023, the company Augusta Due, a Brullo family business, was responsible for the ship's safety management. On that day, the ship was taken over by Gatik Ship Management. The sale occurred despite EU sanctions prohibiting the sale of a ship to sanctioned companies or individuals.<sup>59</sup> It is also worth noting that on July 14, 2024, while still owned by the Brullos, the FILICUDI M (IMO 9298595) conducted an StS with the MARABELLA SUN (IMO 9323376), which is operated by Peninsular Maritime India Private Limited, the same company that operates the EAGLE S. As mentioned above, the EAGLE S is currently impounded by the Finnish authorities because it is suspected of belonging to the Russian shadow fleet and of having been used in the sabotage of the Estlink 2 submarine cable. On December 17, 2024, the MARABELLA SUN was added to the list of sanctioned ships by the EU because it also belongs to the Russian shadow fleet.<sup>60</sup> After the transfer with the MARABELLA SUN, the FILICUDI M was granted access to the Sardinian port of Sarroch, although under EU law the suspicion of possible involvement in the illegal transportation of Russian oil from the ships of the shadow fleet extends to all ships involved in StS transfers with them.<sup>61</sup>

The ship FILICUDI M is no longer owned by the Brullo family, it is now involved in the sanctioned trade with Russian oil. In March 2024, the Italian Coast Guard announced that FILICUDI M would no longer sail under the Italian flag. The then-owner, Augusta Due, had decided to sell the ship.<sup>62</sup> In June 2024, after the deflagging became effective, a limited liability company, REEF MARINE GROUP CORP, was registered in Panama. In November 2024, it became the new owner of FILICUDI M.<sup>63</sup> The acquiring company is registered in the name of a Togo-based Anglo-Georgian named Mikheil Gamkrelidze<sup>64</sup>, who had registered another company, Lionheart Trading Co. in Lomé, under his own name in May 2024. Lionheart Trading is active in the international trade of petroleum products<sup>65</sup>. In Lomé, where Gamkrelidze lives, he receives frequent visits from Ilya Kaganer, an American citizen of Russian origin who works on behalf of Mikhail Mezhentsev, the former di-

rector of the Russian state-owned company Transneftproduct, who is now the owner of Demex, the fifth largest private buyer of Russian crude oil in the world.<sup>66</sup> Evidence obtained by Greenpeace Italy suggests that Demex itself is the real beneficiary of the sale of FILICUDI M, which is also confirmed by the fact that the vessel's first voyage under the new owner was between Novorossiysk (Russia) and Dakar (Senegal), the port of destination most favored by the company of former Russian state director Mezhentsev.<sup>67</sup> FILICUDI M thus appears to have become part of the business of one of the most important companies in the trade in oil and oil derivatives of Russian origin. Demex trades Russian oil on a scale surpassing even that of traditional Moscow oil buyers such as Trafigura, Vitol and Guvnor<sup>68</sup>.

Since the beginning of December 2024, advertisements have been appearing on the Russian internet: AROD LLC-FZ, the company responsible for the safety management of the FILICUDI M - founded anonymously in the United Arab Emirates in May 2024 – **is recruiting a crew**<sup>69</sup>. The description of the vessel for which a crew is being sought is identical in every respect to the FILICUDI M (which, incidentally, is the only vessel managed by AROD): Same capacity, same engines, same flag, same date of construction. AROD refers to a “recent purchase of the vessel” and states that it is only looking for seafarers of Russian nationality to join the crew of the vessel “used for international shipping”. Finally, although FILICUDI M's Norwegian insurer withdrew its insurance cover for the vessel, it remained registered with the RINA Spa, which apparently asked no questions<sup>70</sup>.

It therefore appears that the sale of FILICUDI M does not comply with EU sanctions on Russia, which prohibit entities or bodies established in the Union from selling or otherwise directly or indirectly transferring ownership of tankers for the transport of crude oil or petroleum products to natural or legal persons, entities or bodies in Russia or for use in Russia.<sup>71</sup> This infringement would be compounded by the superficiality of the Italian authorities, who are also prohibited by EU law from “granting a sales license [...] if there are reasonable grounds to believe that the tanker is being used or re-exported for the transport of crude oil or petroleum products [...] originating in Russia or for export from Russia for import into the Union in violation (of the sanctions, editor's note) [...] or transported to third countries at a higher purchase price per barrel than the set price”<sup>72</sup>. The EU intends to make the sale of oil tankers, in particular second-hand vessels, transparent, as these could be used to circumvent the G7+ ban on imports of Russian crude oil or petroleum products and the cap on the price of oil after a change of ownership<sup>73</sup>.

## Sanctioned ships land in Italy

In addition to the FILICUDI M, the Greenpeace investigation unit investigated three other ships that docked in Italian ports in apparent violation of the EU sanctions against Russia. On February 22, 2024, the tanker PLANEO (IMO 9711248) docked at terminal PIR 279 in the port of Ravenna. During the docking maneuver, the vessel was assisted by the tugs EDUARDO PRIMO (IMO 9225160) and GATTO (IMO 9764324) and unloaded the cargo of petroleum products on board at the port<sup>74</sup>, which is confirmed by the draught data<sup>75</sup>. Public sources indicate that the PLANEO, which sailed under the Panamanian flag at the time of the unloading in Ravenna, had sailed under the Russian flag until September 2022<sup>76</sup>. On April 19, 2024, the PLANEO's sister ship, the CAMINERO (IMO 9718923), which had also sailed under the Russian flag in the months following the Russian invasion of Ukraine<sup>77</sup>, was received at the same terminal in Ravenna. According to Article 3e(a) (2) of EU Regulation 2022/576, ships that have changed from the Russian flag to the flag of another state after February 24, 2022, are prohibited from calling at ports in the territory of the European Union<sup>78</sup>.

Under this regulation, the Spanish authorities prevented the vessel MAERSK MAGELLAN (IMO 9447732) from unloading in Tarragona. This action was taken because the MAERSK MAGELLAN had received its cargo from the MV ELEPHANT (IMO 9374868). The MV ELEPHANT, in turn, had taken over its cargo from the MV NOBEL (IMO 9105114), which had sailed under the Russian flag until July 2022.<sup>79</sup>

These precedents indicate that the PLANEO and CAMINERO unloaded illegally in the port of Ravenna and that Petrolifera Italo Rumena SpA (concessionaire of the PIR terminal) and Società Esercizio Rimorchi e Salvataggi - SERS SRL (owner of the tugs involved)<sup>80</sup> facilitated the breach of the sanctions imposed by the European Union on Russia on February 22 and April 19.

Finally, on October 15, 2024, the ATLAS STAR (IMO 9376828) discharged refined petroleum products at the SILONE terminal in Trieste<sup>81</sup>. While in port, the draught decreased from 11 to 7.5 meters, confirming that the vessel was unloading<sup>82</sup>. Just before, ATLAS STAR had carried out a StS transfer with MARTA 1 (IMO 9323974), with the HORAI (IMO 9290517), and the ROUTE (IMO 9281853). The latter two are operated by companies included in the list of war sponsors drawn up by Ukrainian Intelligence<sup>83</sup>.

## Not Just Oil Tankers

In addition to oil tankers, cargo ships that changed their Russian flag after February 22, 2022 have also recently docked in Italian ports. Greenpeace has identified the following ships whose entry into Italian ports should have been denied according to EU sanctions:

- the ship SMART (IMO 8943428), which was in the port of Brindisi on January 22, 2025
- the ships ELLA (IMO 9894105) and UGAH CONFIDENCE (IMO 9892963), which docked in the port of Ravenna on March 12, and on April 2 and 24, 2024, respectively
- as well as the ships ATAMEKEN (IMO 9686390) and UGAH DISCOVERY (IMO 9823871), which docked in the port of Chioggia on July 31 and March 31, 2024, respectively.

MACISTONE, LIONE and GRIFONE are the three tugs that regularly participate in the maneuvers required for StS operations off Augusta and also provide the essential fenders without which such operations would not be possible<sup>84</sup>. The three tugs are identical, fly the Italian flag and are operated directly by their owner, TEC.MA. TECNOLOGIE MARITTIME SRL<sup>85</sup>. In 2023, MACISTONE was detained in Greece for two weeks following an inspection that revealed various shortcomings in the security systems<sup>86</sup>, while GRIFONE has several inspections overdue<sup>87</sup>.

## The role of Libya

Some of the cargoes traded via StS transfers reach Libya, an unusual destination as the country has the largest oil reserves on the African continent<sup>88</sup>. On paper, the import of refined petroleum products is necessary to compensate for the scarce refining capacity in Libya, but in recent years there has been growing suspicion that a large proportion of refined products only enter Libyan ports to be forwarded to other destinations via dubious routes<sup>89</sup>.

The seizure of the ship QUEEN MAJEDA (IMO 9117806) by Albanian authorities in September 2022 uncovered an elaborate oil smuggling scheme worth billions of dollars. The QUEEN MAJEDA, a small and over 30-year-old tanker, was used for oil smuggling, thereby bypassing Libyan authorities. This resulted in financial resources being withdrawn from the country and its citizens, resources that were intended to alleviate energy poverty resulting from decades of conflict. An investigation conducted by Bloomberg revealed the intricate details of the smuggling, identifying several small vessels used by the smugglers, smuggling billions of euros worth of fuel - often of Russian origin - into Europe<sup>90</sup>.

In May of the same year, the QUEEN MAJEDA was seized by the Italian Guardia di Finanza and the Coast Guard for carrying a cargo of fuel without proper documentation. However, the ship was released in June following a positive cargo safety assessment<sup>91</sup>. Although the QUEEN MAJEDA's cargo was undocumented, the Italian authorities apparently did not initiate an investigation into possible smuggling activities. After its release, Greenpeace discovered that the QUEEN MAJEDA had deactivated its AIS transmitter so that it could no longer be located.

As Bloomberg reports, the smuggling of refined petroleum products out of Libya now occurs on a much larger scale than it used to and has moved from the hands of few rogues to organized crime and corrupt authorities. Smuggling was once most prevalent in western Libyan ports, but since the UN-backed government in Tripoli took coercive measures to curb it, smuggling has shifted to the Cyrenaica, where Putin ally General Khalifa Haftar rules<sup>92</sup>.

The Russian origin of many of the suspected smuggled cargoes is confirmed by our investigation, which identified two "chains" of StS operations in which fuel

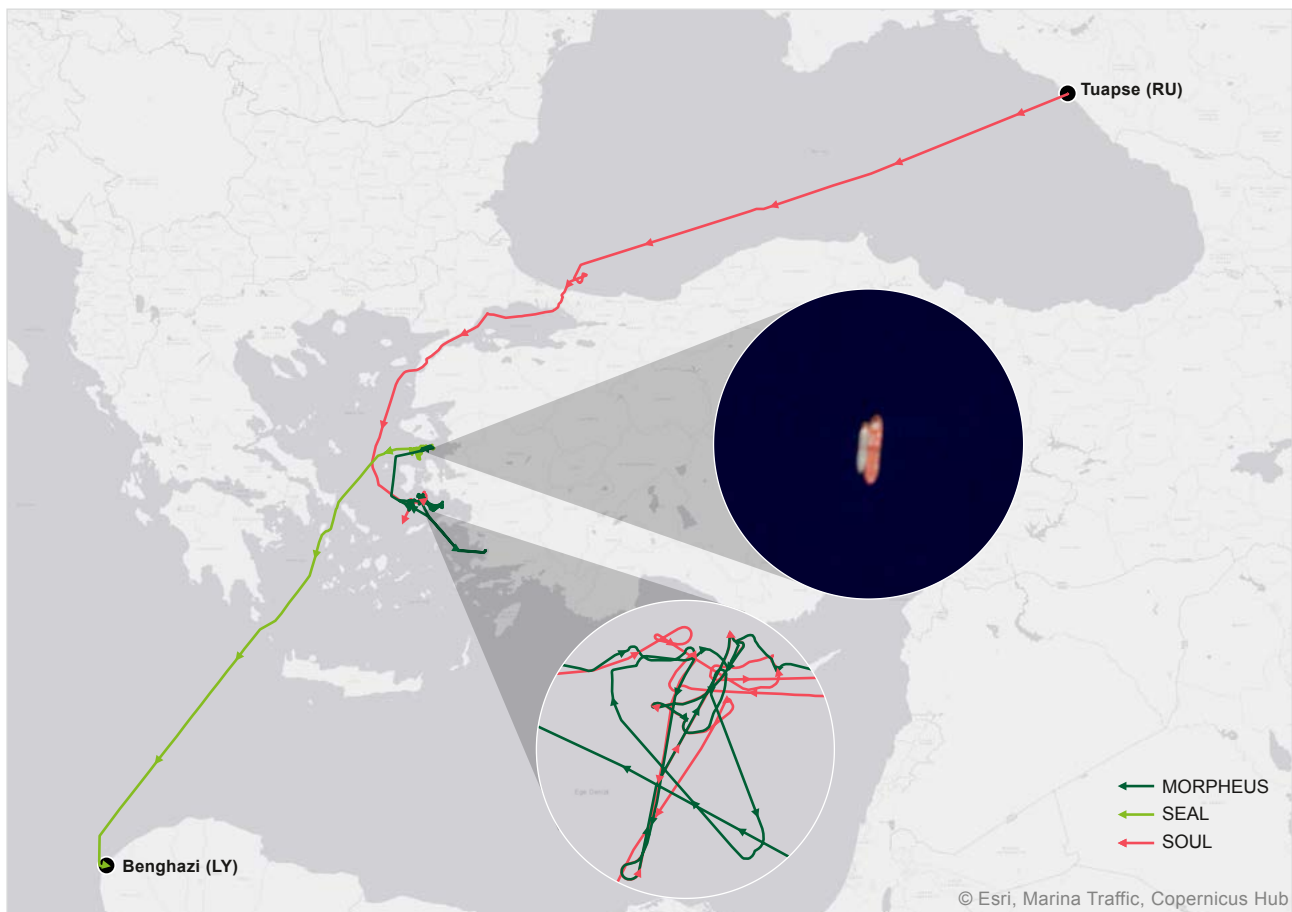


Figure 6: A chain of StS transfers traced by Greenpeace, through which oil arrived from Russia to Libya in August 2024.

cargoes of Russian origin - likely fuel oil or diesel - arrived at the port of Benghazi, the largest city in Cyrenaica. According to the reconstructions<sup>93</sup>, one of these chains began when the vessel SOUL (IMO 9263203) - likely a member of the Russian shadow fleet<sup>94</sup> - loaded fuel at the Russian port of Tuapse on August 5, 2024 and transferred it to the MORPHEUS (IMO 9247443) on August 13 (see figure 6). On August 29, the MORPHEUS transferred its diesel cargo to the SEAL (IMO 9263186) - also a likely member of the shadow Fleet<sup>95</sup> - which delivered it to Benghazi on September 6. This is just one case that Greenpeace has been able to reconstruct, an insight into what is likely to be an extensive network of exchanges involving the Russian shadow fleet.

## The old port of Benghazi

Residents of Benghazi, a city lacking refineries or direct links to Libyan oil wells,<sup>96</sup> rely on sea transport for their fuel needs. Tankers deliver fuel to the city's only appropriate quay, which is frequently in use. The imported fuel is systematically sold by the Libyan government at a price heavily subsidized by state funds. Oil smuggling through Libya exploits these government subsidies: Some of the imported fuel does not reach Libyan families but is instead loaded onto large tanker trucks. These trucks transport the fuel just a few meters away to small, old tanker ships, which lurk at the old port. The ships then leave the port, armed with forged certificates of origin and switched off AIS transmitters, to smuggle the fuel at market price<sup>97</sup>. In this way, the smugglers pocket the difference between the subsidized price and the market price, which is essentially the government incentive that is thus diverted from their intended recipients - Libyan consumers - to the criminal underworld and potentially complicit local authorities.

However, looking at the old harbor from satellite imagery, one notices other tanker ships that are much larger than those used by the smugglers, but also hidden from the AIS system. Their presence poses a mystery, as they were neither identified in connection with the smuggling, nor with the *modus operandi* at the Benghazi port reconstructed so far<sup>98</sup>. Today, for the first time, Greenpeace reveals the identity of these vessels and provides original details about their role in Libyan smuggling and the Russian illegal oil trade.

## MV Nobel and the “storage ships”

Using OSINT (Open Source Intelligence) research, Greenpeace was able to identify some ships involved in Libyan oil smuggling that were previously unknown. This was achieved by analyzing tourist photos, which were taken at the port of Benghazi and published on various social media platforms. Some photos show large tankers in the old port of Benghazi. Through publicly available images and additional measurements on satellite images, Greenpeace was able to conclusively identify some of the present tankers, even though their AIS (Automatic Identification System) was deactivated.

The vessel that was present in the port over long periods of time but not detected by the AIS system was identified as the MV NOBEL (IMO 9105114), whose tracks were lost in the AIS system on July 12, 2024 off Tobruk, east of Benghazi, as the vessel sailed west<sup>99</sup>. Until July 2022, the ship was named Neatis, flew the Russian flag and was owned by the company Rusprimexport LLC based in Moscow. In the meantime, ownership was transferred to a limited liability company in the Seychelles and now sails under the Cameroonian flag<sup>100</sup>. As it has been carrying the Russian flag for five months since the start of the war in Ukraine, it has been subject to sanctions from the EU and is now no longer allowed to deliver cargo to EU waters<sup>101</sup>.

Before it disappeared from the AIS system and landed in Benghazi, the ship had carried out an undeclared StS with the MV ELEPHANT - another tanker carrying the Vietnamese flag - for which it was fined 120,000 euros by the Spanish authorities, who also uncovered other irregularities. The aforementioned MAERSK MAGELLAN, which had taken over the diesel cargo from the MV ELEPHANT, was prevented from unloading in Spanish ports because the Ministry of Transport suspected that this was an attempt to circumvent the sanctions imposed on Russia. The Ministry pointed to the StS transfer carried out between MV ELEPHANT and MV NOBEL as a suspicious element and reminded maritime transport service providers of the legal risks they run when participating in Russian hydrocarbon transfers a few miles from European waters<sup>102</sup>. Following the incident, the authorities of the port of Ceuta, off whose coast the transfer took place, contacted the companies that had supplied the fenders for the operation to warn them that they could be considered “facilitators” of the illegal trade under sanctions legislation and could face legal consequences<sup>103</sup>.





Figure 7: A photo of the MV NOBEL taken in 2019 by a shipspotting enthusiast (top) and the unknown ship in a photo posted in May 2024 on the Instagram channel @benghazi.city (below). Highlighted are the details used by Greenpeace to prove the match between the two ships. The dimensions taken from satellite images also confirm the match.

In the old port of Benghazi, the MV NOBEL carried out an StS transfer with the MV DELONIX (IMO 9298387) between December 2023 and March 2024, as a video identified by Greenpeace on the social network TikTok shows ([link to video](#), [link to original post](#)). DELONIX then sailed to Piraeus, Greece. Given DELONIX's efforts to cover its tracks, Greenpeace was unable to confirm that the company dumped sanctioned products in Greece. One of DELONIX's former managers, DYNAMIC SHIPMANAGEMENT SA-LIB, is known to have sold a number of vessels to several anonymous shipowners, who then incorporated them into the Russian shadow fleet<sup>104</sup>. In April 2024, NOBEL conducted another StS with a vessel that has since been sanctioned by the EU as part of the Russian shadow fleet, the aforementioned MARABELLA SUN.

Other ships that became untraceable near Libya include the FLAMENCO (IMO 9411991), which was underway for 18 hours with its AIS switched off in October 2024, before calling at Benghazi. Immediately afterwards, the ship made a StS transfer with the ROCK (IMO 9288356) - a probable member of the Russian shadow fleet<sup>105</sup> - off Augusta on November 4, 2024. The FLAMENCO then sailed back to Libya.

The SEALEO (IMO 9473066) discharged crude oil of apparent Azerbaijani origin at the South Augusta ISAB terminal<sup>106</sup> on August 24, 2024. However, prior to arrival, it switched off its AIS transmitter for 84 hours while transiting the east coast of North Africa. According to EU regulations, "the deactivation of the AIS for an extended period of time indicates suspicious activity"<sup>107</sup>. Therefore, when the competent authorities carry out a risk analysis with regard to a breach of the relevant prohibitions, they must take into account publicly available information on illegal oil operations in the area where the AIS was deactivated: in this case off the east coast of North Africa, a notorious hotspot for fuel smuggling. However, there is no evidence from public sources of inspections on board the SEALEO by

the Italian authorities, although the IMO recommends that port authorities subject ships that deliberately take measures to avoid their own detection to "thorough inspections"<sup>108</sup>. The GHIBLI (IMO 9417799) also switched off its AIS transmitter for 74 hours on August 28, 2024 while transiting off Libya. After being picked up in the Libyan port of As Sidrah, she then headed for the port of Augusta, where she unloaded crude oil at the terminal operated by Sonatrach<sup>109</sup>. The GHIBLI, which disappeared from the AIS system for 74 hours shortly before delivering a cargo of crude oil to an Italian port, was also not inspected by our authorities. Rather, the vessel was inspected a month later by the Greek authorities, who found that there was no oil pollution liability certificate: one of the six elements that, according to the IMO, can qualify a vessel as part of the shadow fleet<sup>110</sup>. It should also be noted that the company responsible for the safety of the GHIBLI is an Italian company, Marwave Shipmanagement Srl.

Greenpeace has not been able to reconstruct what happened during the hours when the position of these vessels was concealed, nor can we confirm that they were involved in any illegal activity. It should be noted that the International Maritime Organization (IMO) considers deliberate actions to evade detection—such as turning off AIS or LRIT transmitters or concealing a vessel's true identity—without sufficient legitimate security reasons, as factors that can classify a ship as part of the Russian shadow fleet.

In addition to the GHIBLI and the SEALEO, Greenpeace has identified other tankers that unloaded in Italian ports after being underway for a long time with their AIS transmitters switched off: the VALFOGLIA (IMO 9417309, which unloaded in Augusta on December 2, 2024 after 25 hours without AIS signal) and the KRITI LEGEND (IMO 9398266, which unloaded in Trieste on November 27, 2024 after 30 hours without AIS signal), neither of which were inspected by the Italian authorities in 2024<sup>111</sup>.

## Conclusions

Our investigation shows that the lack of vigilance of the relevant Italian authorities - from the government authorities to the port authorities<sup>112</sup> - towards the activities of the shadow fleet a few hundred meters from our territorial waters and in some cases directly in our ports has allowed some of these vessels to circumvent the Russian oil embargo<sup>113</sup> and ultimately contribute to the financing of Putin's war machine.

Around one in three rubles flowing into the Russian treasury is earmarked for Russian military spending, which is estimated to account for 29.4% of Russia's public spending in 2024<sup>114</sup> and will continue to rise in 2025. Despite Western sanctions, the fossil fuel sector remains the Russian Federation's main source of revenue, accounting for around 32% of the federal budget alone (as of 2023), albeit less than 42% in 2022, the year of the invasion of Ukraine<sup>115</sup>.

If gas and oil continue to finance Putin's war, it is not only because of the evasive maneuvers used by Moscow or the weakness of Western controls, as our investigation has shown, but also because the EU has been unwilling to fully abandon fossil fuels and rely on renewables instead. In response to the invasion of Ukraine, the EU limited itself to sanctioning Russian oil by sea without imposing embargoes on Russian gas and liquefied natural gas European imports. Even the decision to allow Western companies to provide services to oil tankers exporting Russian crude oil, subject to the price cap of 60 US dollars per barrel, is linked to Brussels' decision to continue using oil and, consequently, to the need to avoid a global increase in the price per barrel that would have resulted from a possible total blockade of Russian oil and a resulting supply shock. The same applies to Western practices of not controlling strictly enough the origin of oil products imported from third countries that also use Russian sources, which contributes to increasing Moscow's revenues.

Europe's lack of courage and its dependence on oil and gas are, in fact, continuing to finance Putin's war machine. The EU phase-out of Russian fossil fuels is not planned until 2027, when Moscow will hopefully have stopped bombing Ukraine. Too late for the civilians who have been under Russian fire for three years and for the planet disrupted by climate change.

**For this reason, Greenpeace Italy calls on Italy and the European Union to:**

- ban Russian fossil fuels that are not yet fully embargoed such as LNG and pipeline gas;
- identify the tankers of the shadow fleet and include these tankers and their owners in the sanctions packages to ensure that they cannot participate in the Russian oil trade. The shadow fleet's activities not only allow Moscow to circumvent European sanctions, but also pose a serious environmental and financial risk to coastal states, which could face environmental hardship in the event of accidents and oil spills without adequate insurance cover. Other associated risks relate to shipping safety and national security;
- increased monitoring and control of violations of sanctions against Russia and tougher penalties for those responsible;
- stop all imports of Russian fossil fuels before 2027, ban all new fossil fuel infrastructure in the EU, rapidly reduce European fossil fuel consumption and commit to phasing out fossil gases by 2035.

## Appendix - Characteristics of the ships in the sample analyzed by Greenpeace

Name	STS discovered	IMO	Construction date	Tons of Gross capacity	Flag	Insuring Status	Suspicious elements
YELLOW TRADER	On 2024-11-19 with the ship SEAFRIEND (IMO 9629574) and on 2024-01-14 with the ship MINERVA ANNA (IMO 9298507)	9292840	2004 (20 years)	158609	Marshall Islands (Tokyo MoU White List, Paris MoU White List)	Insured	
INDUS 1	On 2024-11-04 by the ship BELLARIS (IMO 9332614)	9360415	2007 (17 years)	39981	Panama (Tokyo MoU White list, Paris MoU Gray list)	Not adequately insured	It was managed by Gatik Ship Management and by Caishan Ship Management. Change of management just as the sanctions were imposed. Involved in activities compatible with those described in IMO resolution A.1192(33)
ROCK	On 2024-11-04 with the vessel FLAMENCO (IMO 9411991) and on 2024-11-02 with the vessel IBELA (IMO 9244441)	9288356	2005 (19 years)	70753	Barbados (Tokyo MoU Gray List, Paris MoU White List)	Insured	It was managed by Beks Tanker Isletmeciligi and Sand Gemi Isletmeciligi. Change of management just as the sanctions were imposed. Involved in activities compatible with those described in IMO A.1192(33)
MARTA 1	On 2024-11-04 with the vessel FOTUO (IMO 9293959), on 2024-10-27 with the DUKE II (IMO 9254240), on 2024-10-25 with the vessel MYTHOS (IMO 9314894), on 2024-08-14 with the vessel SILVERLIGHT (IMO 9577111), on 2024-07-27 with the vessel NOUNOU (IMO 9960980) and on 2024-05-28 with the vessel JI XIANG (IMO 9384459)	9323974	2006 (18 years)	105445	Panama (Tokyo MoU White list, Paris MoU Gray list)	Not adequately insured	Its beneficial owner is Maple Maritime Solutions FZE, Change of management just as the sanctions were imposed. Involved in activities consistent with those described in IMO Resolution A.1192(33)
LADY RINA	On 2024-10-05 with the ship MARITEA (IMO 9210919)	9631383	2012 (12 years)	39310	Italy (Tokyo MoU Grey list, Paris MoU White list)	Insured	
HARDRA-DA	On 2024-09-30 with the ship DUKE II (IMO 9254240)	9344007	2007 (7 years)	45983	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	
NOUNOU	On 2024-09-30 by boat MARALTA (IMO 9324320), the 2024-09-08 with the ship ELECTRA (IMO 9307815) and the 2024-08-31 with the ship CHIBA (IMO 9960980)	9960980	2023 (1 year)	115322	Malta (Tokyo MoU White list, Paris MoU White list)	Insured	
SW CAP FERRAT I	On 2024-09-30 by ship MOUNTING OLYMPUS (IMO 9260081)	9231614	2002 (22 years)	36031	Panama (Tokyo MoU White list, Paris MoU Grey list)	Insured	
HELGA	On 2024-08-31 with ship E PIONEER (IMO 9278686)	9419151	2010 (14 years)	112795	Palau (Republic of) (Tokyo MoU Black list, Paris MoU Black list)	Not adequately insured	It was managed by Gatik Ship Management, Caishan Ship Management and Unic Tanker Gemi Isletmeciligi. Involved in activities compatible with those described in IMO resolution A.1192(33). StS with sanctioned ships.



TG TAU-RUS	On the 2024-08-21 with the ship EAST AS OLIVIA (IMO 9340489) and on 2024-07-27 with the vessel MED ATLANTIC (IMO 9410533)	9523835	2011 (13 years)	26199	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	
MERONAS	On 2024-08-16 with the vessel KIZOMBA (IMO 9433901)	9934905	2022 (2 years)	49990	Greece (Tokyo MoU White list, Paris MoU White list)	Insured	
KIZOMBA	On 2024-08-14 with the vessel CONGA (IMO 9412000)	9433901	2009 (15 years)	51747	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	
CHRISTAL SKY	On 2024-08-11 with the vessel ZEFIREA (IMO 9607643)	9334569	2008 (16 years)	73956	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
HORAI	On 2024-07-27 with the vessel EPIK (IMO 9273832)	9290517	2005 (19 years)	40000	Gabon (Tokyo MoU Black list, Paris MoU White list)	Not adequately insured	It was managed by Gatik Ship Management and Caishan Ship Management. Change of management just as the sanctions were imposed. Involved in activities compatible with those described in IMO resolution A.1192(33)
	On 2024-07-12 with the vessel MINERVA TYCHI (IMO 9723291)	9410973	2011 (13 years)	156516	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
SAN SEBASTIAN	On 2024-05-11 with the vessel SEAFRIEND (IMO 9629574)	9314856	2007 (7 years)	37258	Malta (Tokyo MoU White list, Paris MoU White list)	Insured	
NISSOS SIKINOS	On 2024-04-18 with the vessel DHT OSPREY (IMO 9734111) and the 2024-03-14 with the vessel EAGLE VICTORIA (IMO 9739513)	9884033	2020 (4 years)	157447	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
SEAWAYS DIAMOND HEAD	On 2024-04-13 with the ship MINERVA SYMPHONY (IMO 9304605)	9727039	2016 (8 years)	299989	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
EVA HONG-KONG	On 2024-04-03 with the ship SPRING (IMO 9416812)	9800001	2017 (7 years)	19861	Philippines (Tokyo MoU White list, Paris MoU White list)	Insured	
EAGLE VICTORIA	On the 2024-03-14 with the ship NISSOS SIKINOS (IMO 9884033)	9739513	2016 (8 years)	299392	Singapore (Tokyo MoU White list, Paris MoU White list)	Insured	
JOYCE	On the 2024-02-13 with the ship AMPHITRION (IMO 9724623)	9338814	2007 (17 years)	47344	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
MINERVA PISCES	On 2024-02-13 with the vessel EAGLE S (IMO 9329760)	9410179	2008 (16 years)	105475	Malta (Tokyo MoU White list, Paris MoU White list)	Insured	
DING HENG 45	On 2024-02-08 with EVA GOLD (IMO 9888132)	9330795	2007 (17 years)	19951	Hong Kong, China (Tokyo MoU White list, Paris MoU White list)	Insured	
SEAFRIEND	On 2024-11-19 by boat YELLOW TRADER (IMO 9292840) and on 2024-05-11 with the vessel SAN SEBASTIAN (IMO 9314856)	9629574	2013 (11 years)	50660	Malta (Tokyo MoU White list, Paris MoU White list)	Insured	
BELLARIS	On 2024-11-04 with the vessel INDUS 1 (IMO 9360415)	9332614	2008 (16 years)	74996	Panama (Tokyo MoU White list, Paris MoU Grey list)	Insured	It was managed by Macario Shipping and Fractal Marine, which are under British sanctions.
FLAMENCO	On 2024-11-04 with the ROCK (IMO 9288356)	9411991	2009 (15 years)	37873	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	

FOTUO	On 2024-11-04 with the vessel MARTA 1 (IMO 9323974)	9293959	2006 (18 years)	40158	Liberia (Tokyo MoU White list, Paris MoU White list)	Not adequately insured	
IBLEA	On 2024-11-02 with the ROCK (IMO 9288356)	9244441	2003 (21 years)	35676	Italy (Tokyo MoU Grey list, Paris MoU White list)	Insured	
MYTHOS	On 2024-10-25 with the vessel MARTA 1 (IMO 9323974)	9314894	2006 (18 years)	39378	Gabon (Tokyo MoU Black list, Paris MoU White list)	Not adequately insured	The Kyiv School of Economics reports that the ship was part of the shadow fleet
MARITEA	On 2024-10-05 with the vessel LADY RINA (IMO 9631383)	9210919	2002 (22 years)	35795	Italy (Tokyo MoU Grey list, Paris MoU White list)	Insured	
DUKE II	On 2024-10-27 with the ship MARTA 1 (IMO 9323974) and on 2024-09-30 with the vessel HARDRADA (IMO 9344007)	9254240	2003 (21 years)	47024	Panama (Tokyo MoU White list, Paris MoU Grey list)	Insured	
MARALTA	On 2024-09-30 with the vessel NOUNOU (IMO 9960980)	9324320	2007 (17 years)	76580	Antigua and Barbuda (Tokyo MoU Grey list, Paris MoU White list)	Insured	
MOUNT OLYMPUS	On 2024-09-30 with vessel CAP FERRAT I (IMO 9231614)	9260081	2003 (21 years)	39816	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
ELECTRA	On 2024-09-08 with the vessel NOUNOU (IMO 9960980)	9307815	2005 (19 years)	50921	Gabon (Tokyo MoU Black list, Paris MoU White list)	Not adequately insured	It was managed by Gatik Ship Management and Galena Ship Management. Detained for 2 weeks due to deficiencies in the security system. Engaged in activities contrary to the provisions of Resolution IMO A.1192(33)
CHIBA	On 2024-08-31 with the vessel NOUNOU (IMO 9960980)	9349631	2007 (17 years)	45975	Panama (Tokyo MoU White list, Paris MoU Grey list)	Insured	
E PIO-NEER	On 2024-08-31 with the ship HELGA (IMO 9419151)	9278686	2003 (21 years)	45985	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	
EASTERLY AS OLIVIA	On 2024-08-21 with the TG ship TAURUS (IMO 9523835)	9340489	2007 (17 years)	19981	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
CONGA	On 2024-08-14 by boat KIZOMBA (IMO 9433901)	9412000	2010 (14 years)	37874	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
SILVER-LIGHT	On 2024-08-14 with the ship MARTA 1 (IMO 9323974)	9577111	2012 (12 years)	74588	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	It was managed by Sovcomflot
CLEAN JUSTICE	On 2024-08-11 by boat KIZOMBA (IMO 9433901)	9473717	2011 (13 years)	45998	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	
ZEFIREA	On 2024-08-11 by boat CRYSTAL SKY (IMO 9334569)	9607643	2012 (12 years)	40023	Italy (Tokyo MoU Grey list, Paris MoU White list)	Insured	
EPIK	On 2024-07-27 with ship HORAI (IMO 9290517)	9273832	2004 (20 years)	46719	Panama (Tokyo MoU White list, Paris MoU Grey list)	Insured	
MED ATLANTIC	On 2024-07-27 with the TG ship TAURUS (IMO 9523835)	9410533	2011 (13 years)	26234	Malta (Tokyo MoU White list, Paris MoU White list)	Insured	
MINERVA TYCHI	On 2024-07-12 by boat ADVANTAGE OF SUGAR (IMO 9410973)	9723291	2016 (8 years)	39070	Greece (Tokyo MoU White list, Paris MoU White list)	Insured	

JI XIANG	On 2024-05-28 with the ship MARTA 1 (IMO 9323974)	9384459	2010 (14 years)	30720	Panama (Tokyo MoU White list, Paris MoU Grey list)	Not adequately insured	It was managed by Sun Ship Management, connected with Sovcomflot and sanctioned by the EU
DHT OSPREY	On 2024-04-18 by boat NISSOS SIKINOS (IMO 9884033)	9734111	2016 (8 years)	299999	Hong Kong, China (Tokyo MoU White list, Paris MoU White list)	Insured	
MINERVA SYMPHONY	On 2024-04-13 by boat SEAWAYS DIAMOND HEAD (IMO 9727039)	9304605	2006 (18 years)	159450	Greece (Tokyo MoU White list, Paris MoU White list)	Insured	
SPRING	On 2024-04-03 with the EVA ship HONG KONG (IMO 9800001)	9416812	2009 (15 years)	13022	Marshall Islands (Tokyo MoU White list, Paris MoU White list)	Insured	
AMFITRION	On 2024-02-13 with the ship JOYCE (IMO 9338814)	9724623	2017 (7 years)	50102	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	
EAGLE S	On 2024-02-13 by boat MINERVA PISCES (IMO 9410179)	9329760	2006 (18 years)	74035	Cook Islands (Tokyo MoU Black list, Paris MoU Grey list)	Not adequately insured	Lloyd's List identifies it as part of the shadow fleet. Detained in December 2024 in Finland on suspicion of sabotaging underwater infrastructure.
EVA GOLD	On 2024-02-08 with the ship DING HENG 45 (IMO 9330795)	9888132	2022 (2 years)	19894	Panama (Tokyo MoU White list, Paris MoU Grey list)	Insured	
MINERVA ANNA	On 2024-01-14 with the vessel YELLOW TRADER (IMO 9292840)	9298507	2005 (19 years)	50922	Liberia (Tokyo MoU White list, Paris MoU White list)	Insured	

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