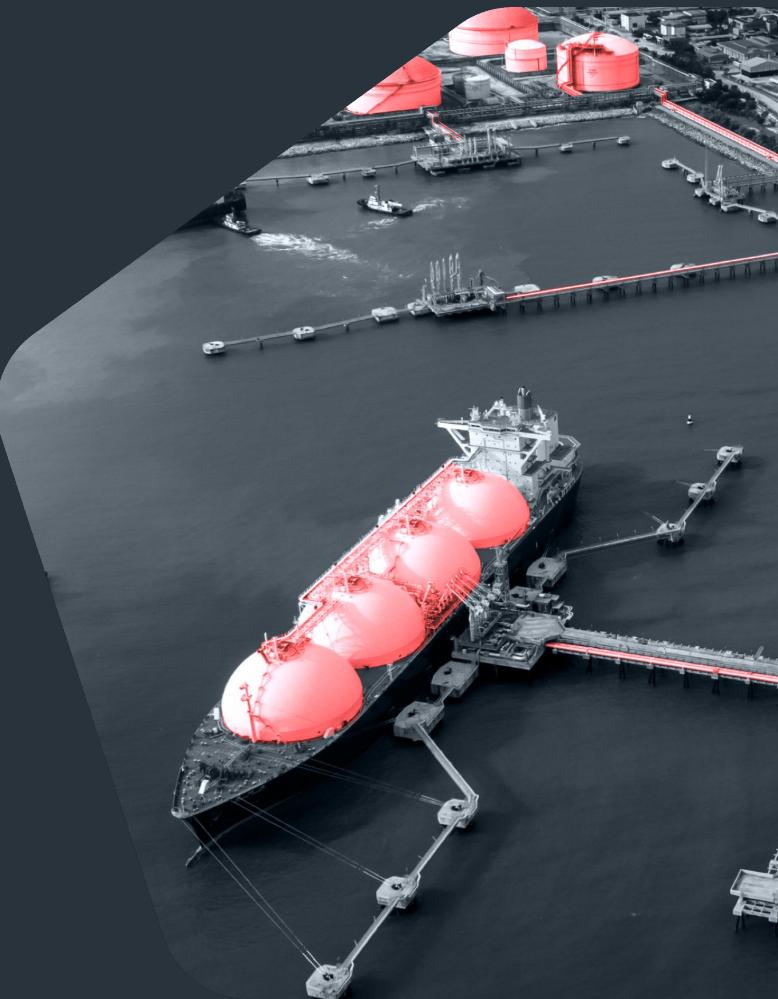


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Navigating Maritime Risk

Harnessing Data for Effective Risk Management



Meet the experts



Dimitris Ampatzidis
Risk & Compliance Analyst



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U.S. National Security Liaison Officer

Content

- **The Current State of Compliance in Shipping**
- **Advanced Technologies in Compliance**

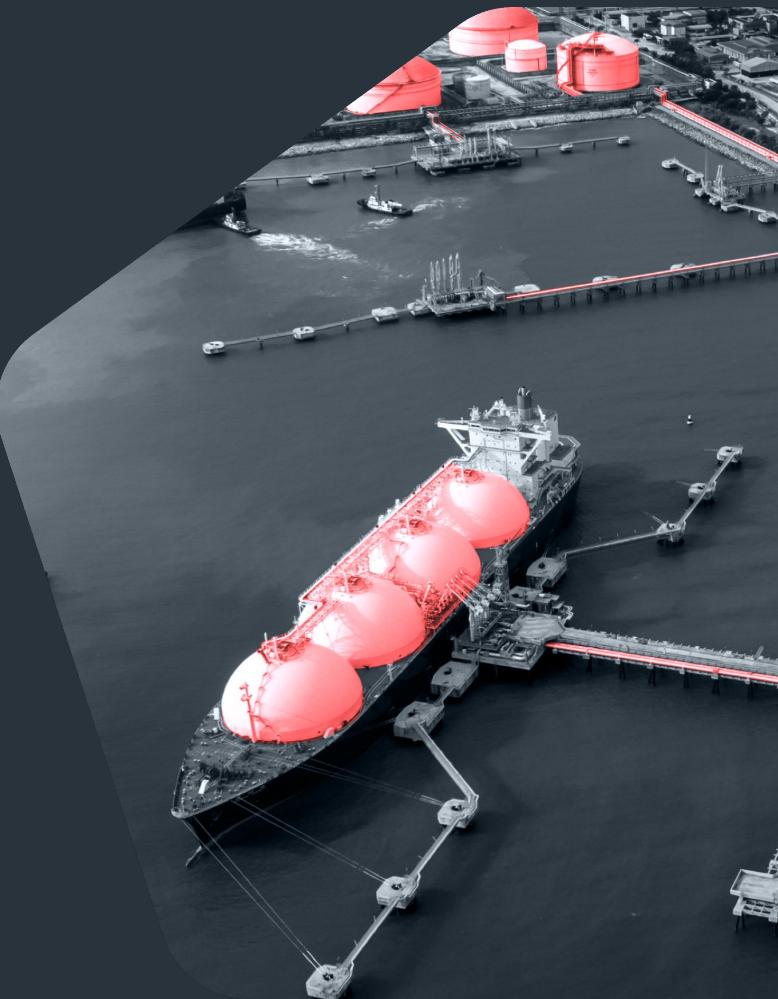
AIS Gaps, High Risk Ship-To-Ship (STS), and AIS Spoofing

- **Leveraging Data for Risk Management**

BELLA 1 and JANET

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The Current State of Compliance in Shipping



The Current State of Compliance in Shipping | Definitions

White: No compliance risks

Grey:

1. Trade with risks (Russia to EU/UK/USA) **OR**
2. Sanctioned Cargo **OR**
3. High Risk STS transfer **OR**
4. High Risk Port Call **OR**
5. AIS Gaps >48h without Draught Change **OR**

Dark:

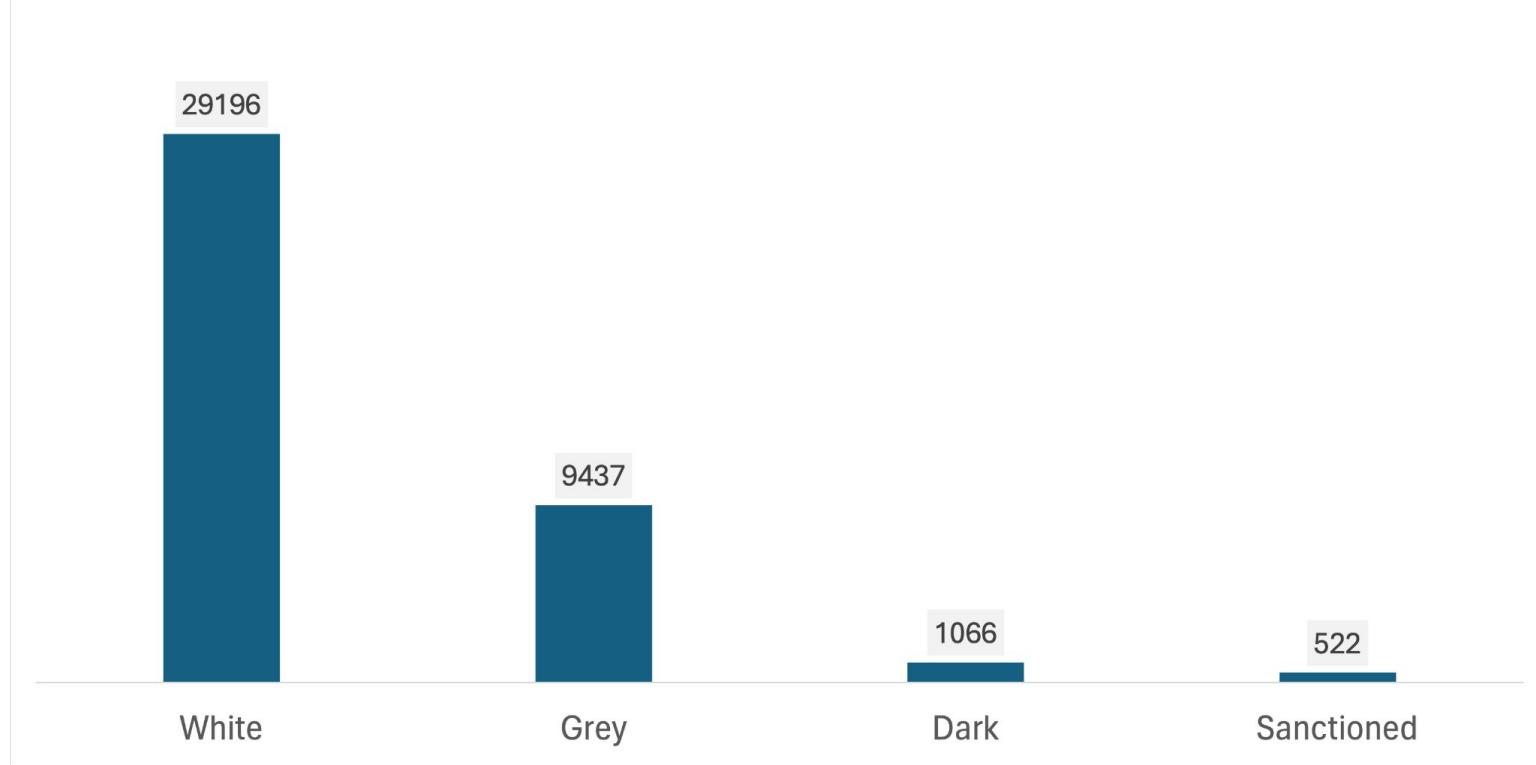
1. AIS Gaps >48h **AND** Draught Change **OR**
2. AIS Spoofing **OR**
3. Sanctioned Trade (Iran, Venezuela, etc.)

Sanctioned:

1. Vessels that are sanctioned **OR**
2. Have sanctioned ownership

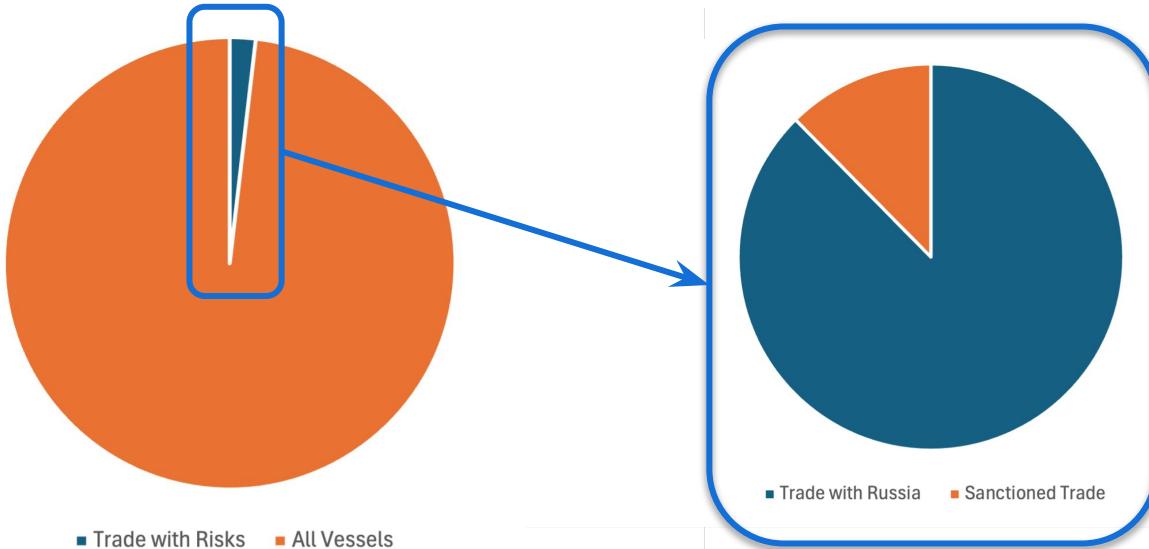
The Current State of Compliance in Shipping |

W-G-D-S breakdown



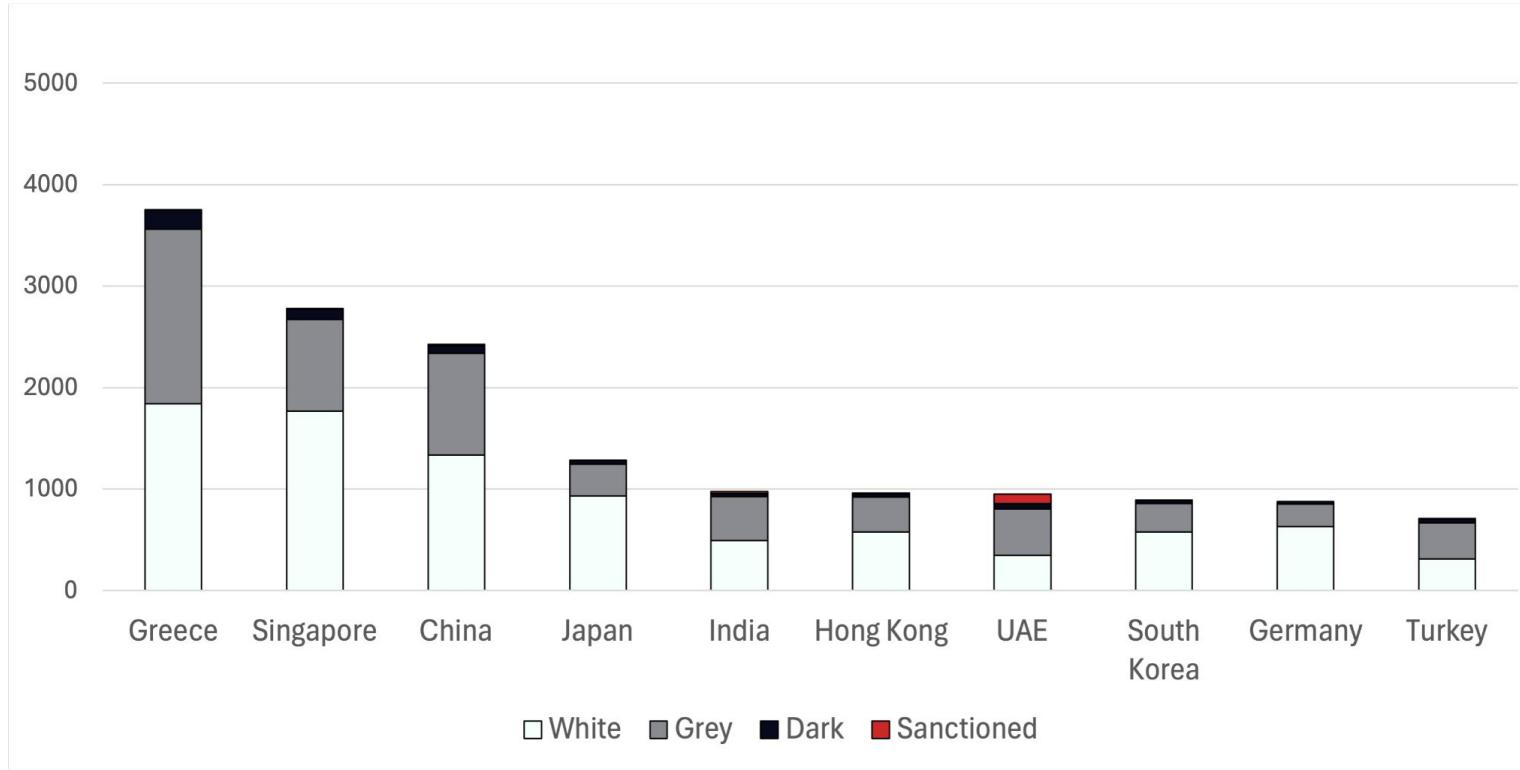
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Trade Risks



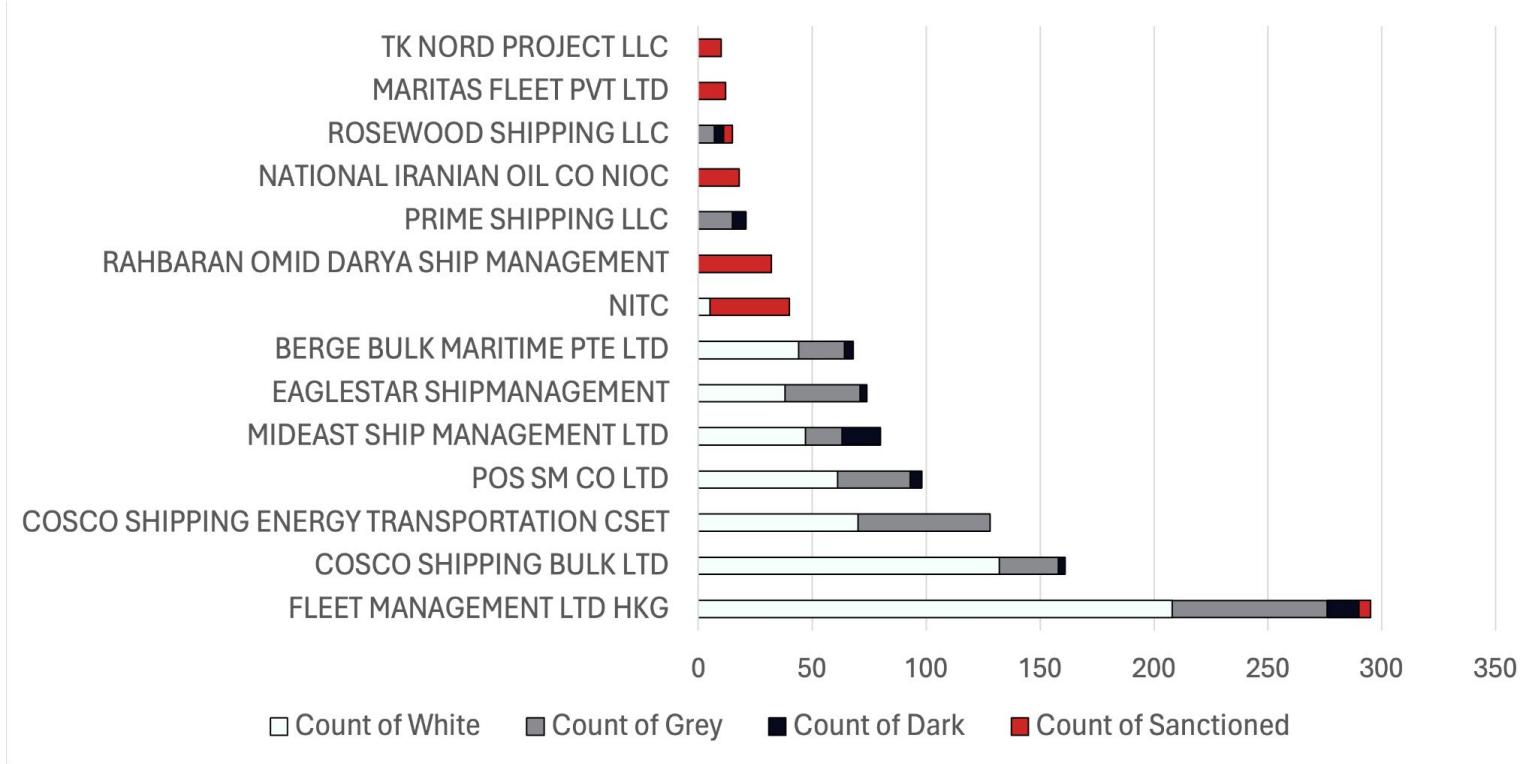
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W-G-D-S by Top10 ISM Manager Countries



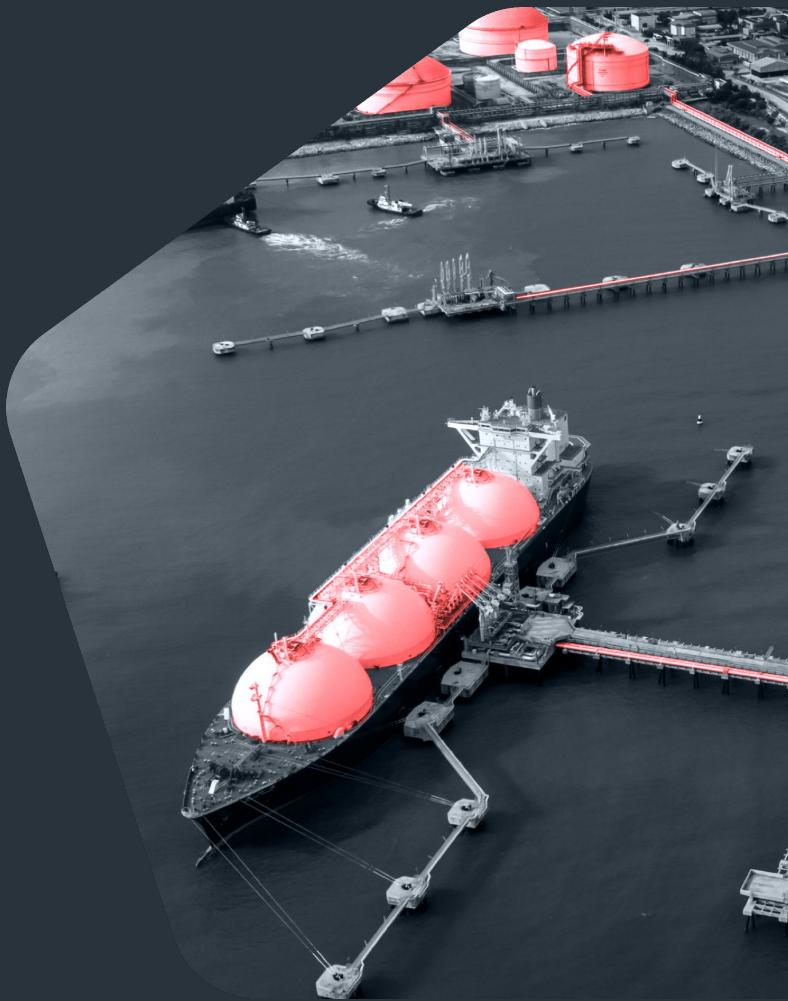
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W-G-D-S by ISM Managers



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Advanced Technologies in Compliance



Advanced Technologies in Compliance |

Operational Risks Definitions

AIS Gaps:

No AIS signal for >20h **AND** No AIS Network Coverage Issue = 

High Risk Ship-To-Ship (STS) Transfers:

Sanctioned vessel(s) **OR** Transferring Sanctioned Cargo **OR** Sanctioned Owner(s) = 

High Risk Port Calls:

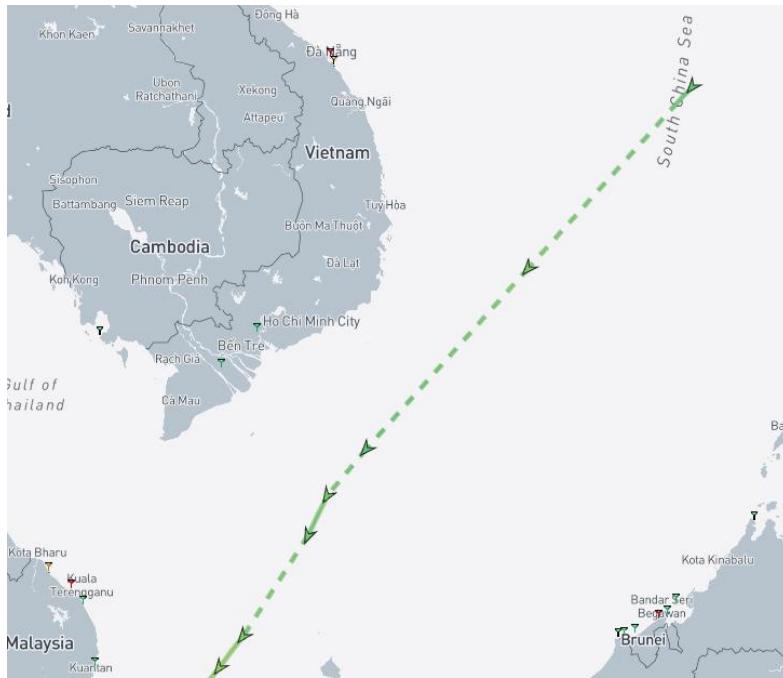
Port Calls in: Iran, Syria, North Korea, Cuba, Venezuela, and Russian occupied Ukrainian territory = 

AIS Spoofing:

Predict vessel position → Compare Predicted vs. Actual AIS reported position **IF** significant differences = 

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AIS Gaps (SFL PANTHER - IMO No. 9664782)



Operational risks

⚠ AIS gaps
2 high risk AIS gaps detected

✓ High risk STS transfers
No high risk STS transfers detected

✓ Port call risks
No port call risks detected

Operational risks

High risk AIS gaps AIS Spoofing High risk port calls High risk STS transfers

Date/Time	Duration	Zone	Draught change
From 01/06/2024 04:26 To 02/06/2024 03:47	23h 21m	Start Vietnam End Vietnam	13.9
From 31/05/2024 04:49 To 01/06/2024 03:21	22h 32m	Start China End Vietnam	-

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High Risk STS (GAS OLYMPIA - IMO No. 9240421)

**Cargo**

The vessel has acquired natural gas liquids Products from Iran (Iran) via an STS event within the last 30 days, which falls under sanctions imposed by OFAC, OFSI & the EU

Operational risks

High risk AIS gaps	AIS Spoofing	High risk port calls	High risk STS transfers
Date/Time	Vessel	Zone	Volume
From 12/05/2024 03:00 To 14/05/2024 03:00	Tulip IMO: 8912558	Sharjah Anchorage	+ 74251
From 26/03/2024 22:15 To 27/03/2024 15:01	Gas Leader IMO: 9114581	Sharjah Anchorage	+ 75755
From 23/01/2024 06:09 To 26/01/2024 07:30	Gas Vision IMO: 9115303	Sharjah Anchorage	+ 41293

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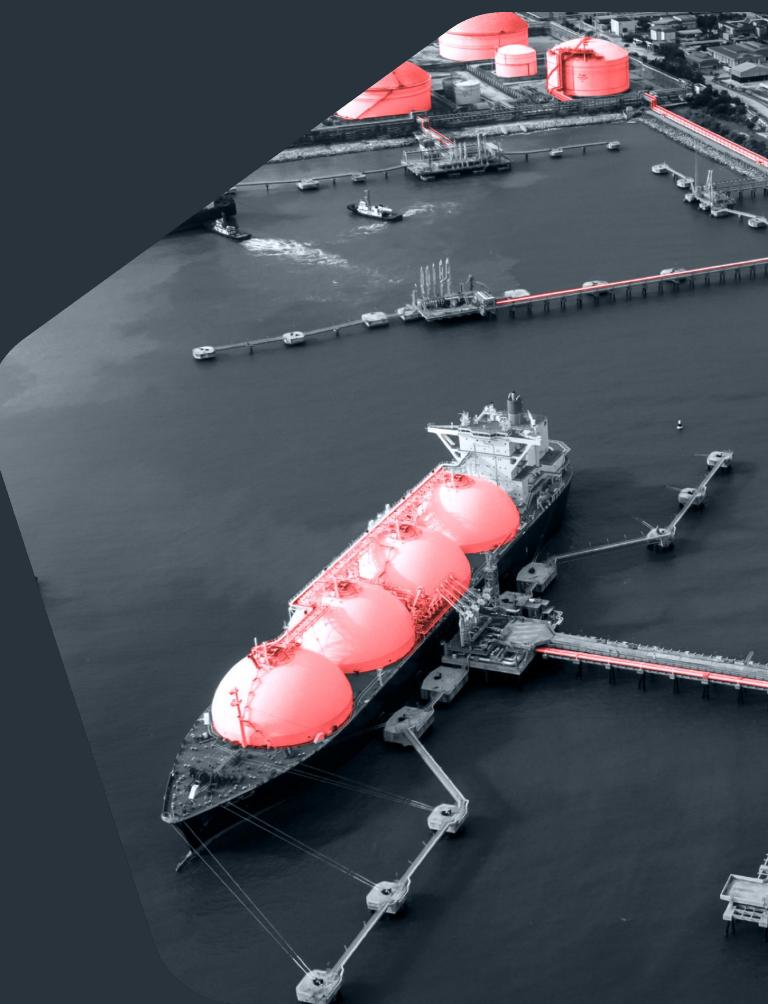
AIS Spoofing (TIVY GOLD- IMO No. 9251559)



Sanction risks	Management risks	Operational risks	Flag risks	
1	1	1	0	
Sanction risks				
Vessel	Cargo	Company	Flag	
Product/Family	Origin Zone	Origin Country	Risk	Authority
Middle Distillates	Taman	Russian Federation	Risk detected	OFAC, OFSI & EU
DPP	Torgovyy	Russian Federation	Risk detected	OFAC, OFSI & EU
Operational risks				
High risk AIS gaps	AIS Spoofing	High risk port calls	High risk STS transfers	
Date/Time	Zone			
From 18/02/2023 11:14	Start Turkey			
To 09/04/2023 01:34	End Turkey			

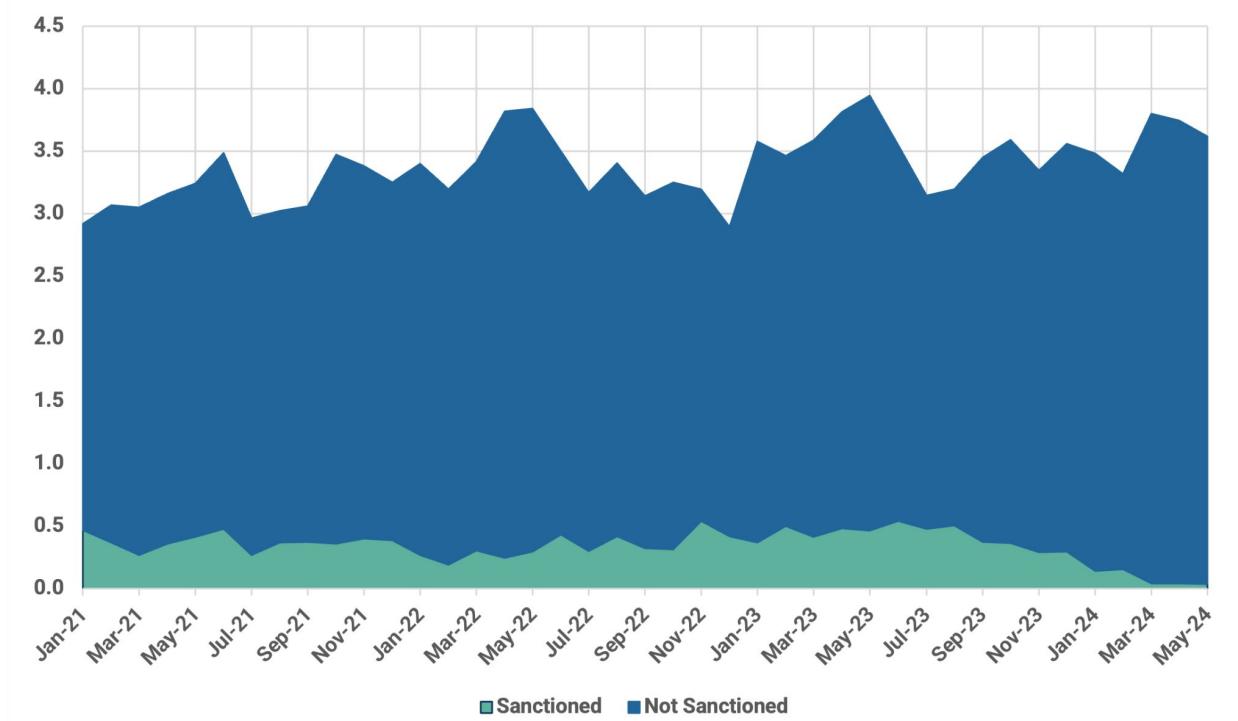
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Leveraging Data for Risk Management



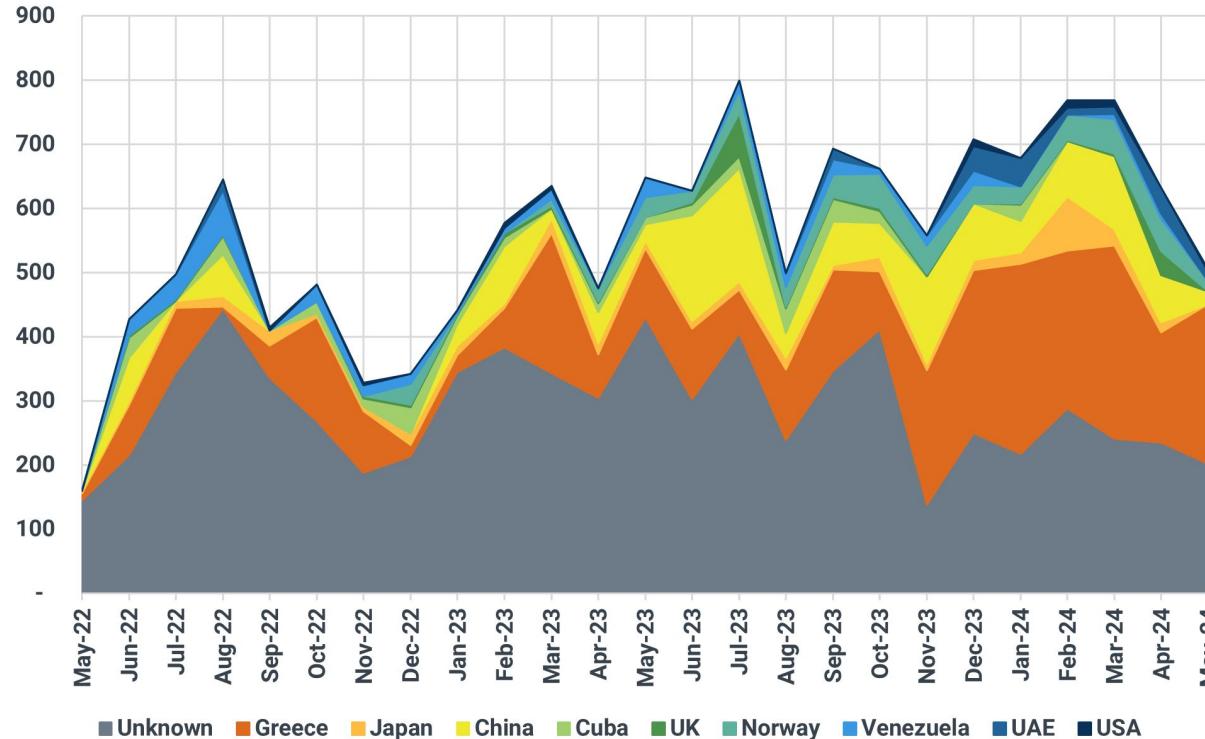
Leveraging Data for Risk Management |

The distribution of the Russian crude flows



Liquids exports from Venezuela by vessel owner

origin



Leveraging Data for Risk Management | BELLA 1 (IMO No. 9230880)

SPECIFICATION

IMO	9230880
MMSI	352002277
Build country	South Korea
Status	Active
Last position	Stopped 38 minutes ago
Capacity	344,308 m ³
DWT	318,518
Class	VLCC
Flag	Panama
Built year	2002
Compliance Method	—

Background story

- Panama flagged
- 23 year-old VLCC
- ISM Manager from Singapore since Nov-2023
- Registered & Commercial from Turkey since Nov-2023
- Classified by Lloyd's Register
- No information for P&I coverage
- No detentions or bannings from the PSC MOUs

Let's see what happened on Monday 10-June-2024..

Leveraging Data for Risk Management | BELLA 1 (IMO No. 9230880)



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the Non-Sanctions List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanction, and the Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near, or proximate, matches, based on the confidence rating set by the user. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing and/or the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#)[Sanctions List Search: Rules for use](#)[Visit The OFAC Web](#)[Download the Consolidated Non-SDN List](#)[Program Code Key](#)

Details:

Type: Vessel	Vessel Name: BELLA 1	List: SDN
Call Sign: 3E3494	Program: SDGT	Vessel Flag: Panama
Tonnage:	Vessel Type: Crude Oil Tanker	Vessel Owner:
Gross Registered Tonnage:	Remarks: (Linked To: LOUIS MARINE SHIPHOLDING ENTERPRISES S.A.)	

Identifications:

Type	ID#	Country	Issue Date	Expire Date
Vessel Registration Identification	IMO 9230880			
MMSI	352002277			
Secondary sanctions risk:	section 1(b) of Executive Order 13224, as amended by Executive Order 13886			

[Back](#)

Sanctioned on Monday 10-June-2024 from OFAC, as the vessel has been supporting the Houthis.

Leveraging Data for Risk Management |

BELLA 1 (IMO No. 9230880)



Sanction risks

- × **Vessel**
The vessel has been related to sanctions >
- × **Cargo**
The vessel has transported **sanctioned cargo** within the last 24 months >
- ✓ **Trade**
The vessel has not been involved in sanctioned trades within the last 24 months >
- × **Ownership**
The vessel's current or past ownership has been subject to sanctions >
- ✓ **Flag**
The vessel's current flag and flag history are not associated with any sanction program >

Risks to detect BEFORE the sanction

- Sanction risks: Transferred **sanctioned cargo** within the last 24 months (Iranian dirty products).
- Management risks: **No coverage from known P&I Clubs**.
- Operational risks: 5 high risk **STS transfers + port call in Venezuela**

Leveraging Data for Risk Management |

BELLA 1 (IMO No. 9230880)

Operational risks

High risk AIS gaps	AIS Spoofing	High risk port calls	High risk STS transfers
Date/Time	Vessel	Zone	Volume
From 18/06/2024 17:02 To 19/06/2024 04:45	Jasmina IMO: 9834521	Fujairah Light.	
From 31/12/2023 23:15 To 01/01/2024 10:57	Jasmina IMO: 9834521	Fujairah Light.	
From 27/09/2023 03:00 To 28/09/2023 03:00	Amor IMO: 9182291	EOPL	+ 317895
From 14/01/2023 02:00 To 15/01/2023 02:00	Hawk IMO: 9362061 S	EOPL	+ 337918
From 07/11/2022 02:00 To 08/11/2022 02:00	Titan IMO: 9293741	EOPL	+ 319835

Operational risks

High risk AIS gaps	AIS Spoofing	High risk port calls	High risk STS transfers
Date/Time	Port	Country	Volume
From 11/05/2023 03:00 To 12/05/2023 03:00	Port of Jose	Venezuela S	+ 339143

Risks detected BEFORE the sanction

- 5 High Risk **STS** since 01-Jan-2022, one of them with a **sanctioned vessel** (HAWK).
- Port call in Port of Jose, **Venezuela** in which she loaded cargo.

Leveraging Data for Risk Management | JANET (IMO No. 9220952)

SPECIFICATION	
IMO	9220952
MMSI	352003341
Build country	South Korea
Status	Active
Last position	Stopped an hour ago
Capacity	332,221 m ³
DWT	303,116
Class	VLCC
Flag	Saudi Arabia
Built year	2001
Compliance Method	—

Background story

- Saudi Arabia flagged
- 24 year-old VLCC
- Management from Hong Kong, China since Nov-2023
- Classified by DNV
- P&I coverage from Britannia Steamship
- No detentions or bannings from the PSC MOUs

Let's see what happened on Monday 10-June-2024..

Leveraging Data for Risk Management |

JANET (IMO No. 9220952)



Sanctions List Search

Specially Designated Nationals and Blocked Persons list ("SDN List") and all other sanctions lists administered by OFAC, including the Foreign Sanctions Evaders List, the No Sanctions Act List, the Sectoral Sanctions Identifications List, the List of Foreign Financial Institutions Subject to Correspondent Account or Payable-Through Account Sanction, Palestinian Legislative Council List. Given the number of lists that now reside in the Sanctions List Search tool, it is strongly recommended that users pay close attention to the associated with each returned record. These program codes indicate how a true hit on a returned value should be treated. The Sanctions List Search tool uses approximate string matching to identify possible matches between word or character strings as entered into Sanctions List Search, and any name or name component as it appears on the SDN List and/or the sanctions lists. Sanctions List Search has a slider-bar that may be used to set a threshold (i.e., a confidence rating) for the closeness of any potential match returned as a result. Sanctions List Search will detect certain misspellings or other incorrectly entered text, and will return near or proximate matches, based on the confidence rating set by the user. OFAC does not provide recommendations with regard to the appropriateness of any specific confidence rating. Sanctions List Search is one tool offered to assist users in utilizing the various other sanctions lists; use of Sanctions List Search is not a substitute for undertaking appropriate due diligence. The use of Sanctions List Search does not limit any civil liability for any act undertaken as a result of, or in reliance on, such use.

[Download the SDN List](#)[Sanctions List Search: Rules for use](#)[Visit The OFAC Web](#)[Download the Consolidated Non-SDN List](#)[Program Code Key](#)

Details:

Type:	Vessel	List:	SDN
Vessel Name:	JANET	Program:	SDGT
Call Sign:	3E7497	Vessel Flag:	Panama
Tonnage:		Vessel Type:	Crude Oil Tanker
Gross Registered Tonnage:		Vessel Owner:	
		Remarks:	(Linked To: LAINEY SHIPPING LIMITED)

Identifications:

Type	ID#	Country	Issue Date	Expire Date
Vessel Registration Identification	IMO 9220952			
MMSI	352003341			
Secondary sanctions risk:	section 1(b) of Executive Order 13224, as amended by Executive Order 13886			

[Back](#)

Sanctioned on Monday 10-June-2024 from OFAC, as a vessel supporting the Houthis.

Leveraging Data for Risk Management |

JANET (IMO No. 9220952)

Sanction risks

2

Management risks

0

Operational risks

1

Flag risks

0

Sanction risks

Vessel

The vessel has been related to sanctions



Cargo

The vessel has transported **sanctioned cargo** within the last 24 months

Trade

The vessel has not been involved in sanctioned trades within the last 24 months



Ownership

The vessel's current and past ownership has not been subject to sanctions



Flag

The vessel's current flag and flag history are not associated with any sanction program

Risks detected BEFORE the sanction

- Sanction risks: Transferred **sanctioned cargo** within the last 30 days (Iranian dirty products).
- Operational risks: 2 high risk **AIS gaps**

Leveraging Data for Risk Management |

JANET (IMO No. 9220952)

Risks to detect BEFORE the sanction

Operational risks

High risk AIS gaps	AIS Spoofing	High risk port calls	High risk STS transfers
Date/Time	Duration	Zone	Draught change
From 15/06/2024 16:57 To 18/06/2024 10:28	2d 17h	Start Taiwan End Taiwan	-
From 01/06/2024 16:18 To 02/06/2024 15:02	22h 44m	Start Philippines End Philippines	21.5
From 31/05/2024 05:31 To 01/06/2024 09:53	1d 4h	Start Vietnam End China	-

- The AIS gap near the Philippines lasted about 23h and we had a draught change **AND** this was in a high risk area near Taiwan which is a well known area for STS transfers that ultimately end up in North Korea = !



Thank You!

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Questions?

