



NIUE SHIP REGISTRY

Website: www.niueship.com

RE-IMPOSITION OF U.S. SANCTIONS AGAINST IRAN (Circular NMC3.2018 (rev7))

PURPOSE:

Notify ship owners/manager/operators/insurers/ROs on the developments regarding sanctions against the Islamic Republic of Iran by the U.S. and its implications to the maritime industry.

REFERENCES:

1. Announcement by the U.S. Whitehouse: <https://www.whitehouse.gov/briefings-statements/president-donald-j-trump-ending-united-states-participation-unacceptable-iran-deal/>
2. Iran-related executive order by the U.S. President: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/08062018_iran_eo.pdf
3. U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) FAQ: https://www.treasury.gov/resource-center/faqs/Sanctions/Pages/faq_iran.aspx#eo_reimposing

BACKGROUND:

The U.S. President has, on 8 May 2018, announced his decision to cease the U.S. participation in the Joint Comprehensive Plan of Action (JCPOA) and begin re-imposing, following a wind down period, the U.S. nuclear-related sanctions that were lifted to effectuate the JCPOA sanctions relief in 2016.

The U.S. Departments of State and of the Treasury has taken steps necessary to establish a 90 day wind down period (which ended on 6 August 2018), and a 180 day wind down period (which ends on 5 November 2018), for activities involving Iran which were consistent with the U.S. sanctions relief provided for under the JCPOA, and in respect of which sanctions will now be re-imposed.

The sanctions relief provided for under the JCPOA led to the lifting of many of the U.S. secondary sanctions i.e. measures and prohibitions on non-U.S. persons and entities. Therefore, the re-imposition of these secondary sanctions will directly impact on the ability of non-U.S. persons and entities to trade with Iran.

The U.S. has issued FAQ's regarding the re-imposition of sanctions (refer to Reference (3)) which provides further detail of the sanctions to be re-introduced. A summary of some of the more critical points are set out below in this circular.

PARTY RELATED SANCTIONS:

In accordance with the relaxation of sanctions, hundreds of individuals and entities were removed from the U.S. sanctions lists (or were no longer subject to secondary sanctions). These parties will now be relisted no later than 5 November 2018. After their relisting, most of these parties will be subject to secondary sanctions (some Iranian entities have remained on the Specially Designated National "SDN" list and subject to secondary sanctions throughout, whilst others had been listed only as non-SDNs not subject to secondary sanctions).

ACTIVITY RELATED SANCTIONS:

1. After the 90-day wind down period which ended on 6 August 2018, sanctions have been re-imposed on:
 - The purchase or acquisition of U.S. dollar banknotes by the Government of Iran;
 - Iran's trade in gold or precious metals;
 - The direct or indirect sale, supply, or transfer to or from Iran of graphite, raw, or semi-finished metals such as aluminum and steel, coal, and software for integrating industrial processes
 - Significant transactions related to the purchase or sale of Iranian currency, or the maintenance of significant funds or accounts outside the territory of Iran that occurs in Iranian currency;
 - The purchase, subscription to, or facilitation of the issuance of Iran sovereign debt;
 - Iran's automotive sector.
2. After the 180-day wind down period which ends on 4 November 2018, sanctions will be re-imposed on:
 - Iran's port operators and shipping and shipbuilding sectors, including on the Islamic Republic of Iran Shipping Lines (IRISL), South Shipping Line, or their affiliates;
 - Petroleum related transactions, with, among others, the National Iranian Oil Company ("NIOC"), Naftiran Intertrade Company ("NICO"), and National Iranian Tanker Company ("NITC") including the purchase of petroleum, petroleum products, or petrochemical products from Iran;
 - Transactions by foreign financial institutions with the Central Bank of Iran and other foreign financial institutions that have been designated under NDAA Section 1245;
 - The provision of specialized financial messaging services to the Central Bank of Iran and other Iranian financial institutions;
 - The provision of underwriting services, insurance, or reinsurance; and
 - Iran's energy sector.

LIST OF VESSELS BARRED FROM REGISTRATION UNDER NIUE (non-exhaustive):

The vessels below are derived from:

1. List of vessels de-flagged by Panama on 07 February 2019 owned or linked to NITC and IRISL;
2. List of vessels de-flagged by Marshall Islands on 08 February 2019 involved with Iranian malign activity associated with the destabilization of the Middle East;
3. List of vessels identified in the 20 November 2018 OFAC shipping advisory;
4. List of vessels identified in the 4 September 2019 OFAC shipping advisory;
5. List of vessels de-flagged by other Flag Administrations for breaching of U.S. sanctions on Iran.

Vessel Name	IMO Number
GOEAST	7526924
RAMA 1	8306711
RAWAN	8697304
GOLDEN SEA	8800298
MAESTRO	8810700
GITTA GAS	8817693
GAS TARA	8818219
IRAN SHALAMCHEH	8820925
OCEAN 61	8870865
SEA SHARK	8919154
REEM 3	9004815
CANDY (ex VENICE)	9005479
EMIRATES PEACE	9010802
BASILIA	9012305
ENERGY GAS	9034690

OPEC ATHENA	9052331
BELEMA LIGHT CRUDE	9079066
NAVARZ	9079078
NASHA	9079107
KADER	9080493
WU XIAN	9102239
VOLGA (ex MARSHAL ZHUKOV)	9104770
JASMINE	9105085
HUASHENG	9105102
BONITA QUEEN	9105906
SEA SAPPHIRE	9114581
ADRIAN DARYA	9116412
DEVREZ	9120994
CASPIA	9125126
DELICE	9125138
TAIHUA SPIRIT	9125243
VELA 7	9127291
SENNA 8 (ex ODYN GAS)	9128673
SCHUMI (ex IRIS GAS)	9134359
SANREMO	9144067
SIENNA	9147447
GULF SKY	9150377
MR NAUTILUS	9150767
SOLAN	9155808
TRUE OCEAN	9169421
STARK I	9171450
SOL	9171462
SINOPA	9172038
SABITI	9172040
SILVIA I	9172052
MOON SINO	9174608
DESTINY	9177155
DISTYA PUSHTI	9179127
HUMANITY	9180281
SILVANA III	9183348
FELICITY	9183934
ARK	9187655
ARGO I	9187667
DUNA	9203253
DURAS	9203265
DANTE	9203277
LATIN VENTURE	9206035
HEDY	9212888
HALTI	9212890
HAPPINESS I	9212905
HASNA	9212917
HENNA	9212929

DEVON	9218454
DORE	9218466
DIAMOND II	9218478
DOWNY	9218480
DEEP SEA	9218492
SOBAR	9221970
JUDY II	9224295
AL FORAT	9224568
SARAK	9226968
CERES I	9229439
OCEAN SAFARI	9233349
NADEZHDA	9254915
BAMZI	9256468
ROYAL MAJESTIC	9258305
MIAMI PRIDE	9274941
FORTUNE	9283746
FAXON	9283758
FOREST	9283760
DALTON	9293741
EVERRICH 2	9294795
HELEN M	9308223
ARSOS M	9313761
MOTIVATOR	9340386
ARAMIS	9354521
DREAM II	9356593
HUGE	9357183
SANA	9357353
SONIA I	9357365
SALINA	9357377
HILDA I	9357389
HELM	9357391
AMBER	9357406
DORENA	9357717
DAN	9357729
PATRIOTIC	9361469
HERBY	9362059
HORSE	9362061
HERO II	9362073
TOUR 2	9364112
KORSARO	9373137
MIURA	9390903
LEVANTE	9391139
VALE	9391153
OPEC FORTUNE	9393008
OASIS 1	9465629
JUMAIRA	9477177
AZIZ TORLAK	9558763

SEA STAR III	9569205
SNOW	9569619
STARLA	9569621
STREAM	9569633
SERENA	9569645
SEA CLIFF	9569657
DOVER	9569669
DINO I	9569671
DANIEL	9569683
DIONA	9569695
DERYA	9569700
DUNE	9569712
MARIA III	9615092
ALMETYEVS	9621558
TRUVOR (ex MUKHALATKA)	9676230
YAZ	9735323
HYUNDAI MIPO 2655	9820312
HYUNDAI MIPO 2656	9820324
HYUNDAI MIPO 2657	9820336
GIESSEL	9246279
EKATERINA	9196644
LERAX	9181194
ARROW	9127033
NEXO	9014456
ANAHI ex AMFITRI	9273337
XENIA S	9165542
ELISA SEA	9199828
SIMBA	8617055

LIST OF COMPANIES BARRED FROM REGISTRATION UNDER NIUE (non-exhaustive):

Company Name	IMO Number
FLORETTA SHIP MANAGEMENT PVT LTD	6145921
RAVEL SHIP MANAGEMENT PVT LTD	6117756
OVTRANS PETROL TRANSPORT SERVICES COMPANY LIMITED	6152733
WAVES SHIPPING LINE FZE	5760769
KAMA SHIPPING CO SA	6138448
BELLATRIX SHIPPING LTD-SEY	6157460
BALDER SHIPPING INC	6153405
SHRADHA SHIPMANAGEMENT PVT LTD	6176451
ORGONE INTERNATIONAL LTD	6158627

ACTIONS REQUIRED:

In view that the above has significant implications on maritime and financial trade with Iran and the insurance of such trade, the Administration requires all ship owners and operators who may have trade with Iran or have vessels calling Iran to:

1. Study the FAQ (paying special attention to items 606 and 607) as some activities have become sanctionable after 7 August 2018 and full sanctions come into force after 5 November 2018; and
2. Notify the P&I club to ensure that the vessel's coverage is not affected by the vessel's call to Iran.

It is in the best interest of all non-U.S., non-Iranian persons to immediately wind down their activities with or involving Iran that will become sanctionable at the end of the applicable wind-down period. If the sanctionable activities continue beyond the wind-down period deadlines, penalties may be imposed by the U.S.

Please note that any breach of the sanctions or invalidation of the P&I cover will lead to the closure of the vessel's registration.

Please do not hesitate to contact the Registry at operations@niueship.com or call: +65 6226-2001 for clarification.