

RUSSIA'S SHADOW FLEET



Written by Crude Accountability

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About Crude Accountability

Crude Accountability is an environmental and human rights non-profit organization that works with communities in the Caspian and Black Sea regions, which struggle against threats to local natural resources and negative health impacts. Crude Accountability works on the local, national, regional, and international levels in partnership with communities and organizations committed to a just and environmentally sustainable world. Based in Northern Virginia, Crude Accountability also collaborates with other environmental organizations in the United States.

Introduction

As an environmental organization with a focus on the fossil fuel industry's impact on local communities in the Caspian and Black Sea regions and on climate, Crude Accountability has always worked as a watchdog monitoring the oil industry. Our interest in the impacts of the Russian oil shipping industry began during our advocacy campaign to support the local community of the Taman peninsula in its effort to hold accountable OTEKO, the main company responsible for the development of the Port of Taman, which it owns and operates. During that campaign, a significant oil spill occurred off the coast of this once pristinely natural township in Southern Russia. For reasons unknown, a river barge which normally transported oil up and down the Don River, made its way out to the Sea of Azov and capsized in a storm, severely polluting the Taman peninsula with fuel oil. With this catastrophe as a backdrop, combined with the ever-growing climate crisis, and the rise of the Russian "shadow fleet," Crude Accountability committed to a two-year study of the maritime industry and the oil trade that flows out of Russian ports through the Black Sea. Our investigation resulted in two reports on the [opaque and unregulated nature of the industry](#), [identified Western enablers](#), and now provides this dossier, which serves to further develop the two previous reports.

Executive Summary

In a two-year investigation, Crude Accountability has tracked and identified eight ships that facilitate the Russian oil trade from the ports of Taman, Ust Luga, Murmansk, and Novorossiysk despite the sanctions placed on the Russian Federation since its war of aggression against Ukraine began. These oil products enter EU ports while Western companies continue to insure, support, own, and operate the vessels that carry the product to market. In many cases, Crude Accountability was able to identify and track ships conducting ship-to-ship transfers within EU waters, creating serious risks of oil spillage and environmental damage to the Gulf of Lakonia, Greece.

On January 10, 2025, the US government sanctioned 183 ships associated with the Russian shadow fleet. Two of these, the *Nanda Devi* and the *Sagitta*, were identified by Crude Accountability as likely being associated with the Russian shadow fleet but were not tracked. The actions of the US government are commendable but they are far from enough. This report contains details on an additional eight ships and an index of 15 more, which we strongly believe are part of the Russian shadow fleet. The risk these aging tankers pose was evident on December 15th, 2024, when two aging Russian oil tankers¹, *Volgoneft-212* and *Volgoneft-239*, were wrecked in a storm in the Strait of Kerch, dumping 5,000 tons of fuel oil into the surrounding waters, contaminating both the Sea of Azov and the Black Sea. The risk of additional catastrophes looms large as long as the Russian shadow fleet continues to operate. European Union waters, especially in Greece, are at particular risk, but this is an environmental danger that impacts the entire world.

¹ <https://www.washingtonpost.com/world/2025/01/27/russia-crimea-oil-spill-birds-rescue/>

Glossary

AIS: Stands for Automatic Identification System. It is used by ships to identify themselves while at sea. Typically, this is wired through onshore facilities that catch the signal. Should a ship venture far enough away from an AIS tracker, a GPS tracker is typically then employed.

Anchorage: An area of sea that is suitable for ships to lay anchor outside of port. Typically, this serves as a waiting area for port entry though may also serve as an area to conduct ship-to-ship transfers.

Bunkering: A term for refueling. This refueling is conducted by a bunkering ship within an anchorage; at sea.

Beneficial Owner: A person or entity who enjoys the benefits of ownership even though the title to the ship is in another name.

Classification Society: Organizations that develop and apply technical standards for the design, construction, and survey of ships and carry out surveys and inspections on board ships.

Disponent Owner: Person or entity who has the right to use and possession of the ship, either as owner or as charterer of the ship from the owner.

Owner: The current registered owner of the ship.

Ship-to-ship (STS) transfer: A term that typically describes a process of transferring oil from one ship to another while in open waters.

Agios Nikolaos



Figure 1. Agios Nikolaos, Marinetraffic.com/Heiner Trappmann

Manager: CENTROFIN MANAGEMENT INC

Owner: Rexel Corporation

Beneficial Owner: Dimitris Prokopiou & family

Insurance/Club: London Steamship Owners Mutual Insurance Association Ltd

Classification Society: Bureau Veritas

Summary of Activity

Crude Accountability tracked the *Agios Nikolaos* between July 2022 and October 2023. During that time, the crude oil tanker entered Russian oil ports and conducted several ship-to-ship transfers. The *Agios Nikolaos* entered the Russian ports of Primorsk, Novorossiysk, St. Petersburg, Taman, and Tuapse. The ship also entered the non-Russian ports of Chekka, Zahrani Terminal, Beirut, Tanger Med,

Wilhelmshaven, Nordenham, Bremen, Weser-petrol, Riga, Algeciras, Jorf Lasfar, and La Goulette Nord. The *Agios Nikolaos* engaged in ship-to-ship transfers within the Laconian Gulf, Greece.

Significance of Activity

The *Agios Nikolaos* transported Russian oil to six different countries within a year. Additionally, the ship transferred Russian oil to seven different tankers within Greek territorial waters and to an 8th tanker off the coast of Togo. According to the information available to Crude Accountability, *Agios Nikolaos* [maintained its Western-based insurance](#) via London Steamship Owners Mutual Insurance Association Ltd throughout this above-mentioned timeline. This means the ship may have violated sanctions against the Russian Federation, should it have sold any Russian oil products above the established \$60 per barrel limit. Additionally, the ship continued to support the Russian oil industry and thus the Russian war effort. This also demonstrates that as late as May 2023, the EU continued to facilitate Russian oil sales within its boundaries. The owner of the *Agios Nikolaos*, Dimitris Prokopiou, is a member of the Prokopiou family, under George Prokopiou, who has been [identified by Ukraine as an EU-based international sponsor of war](#).

Activity Flagged

July 19th, 2022

St. Petersburg, Russia
Petersburg Oil Terminal
2 days

July 26th, 2022

Skagen Anchorage, Denmark
5 hrs.

August 9th, 2022

Chekka, Lebanon

3 days

August 13th, 2022

Zahrani Terminal, Lebanon

14 hrs.

August 14th, 2022

Beirut Anchorage, Lebanon

1 day

February 28th, 2023

Laconian Gulf Anchorage, Greece

8 days

March 12th, 2023

Disappears off tracking after leaving Bosphorus Straits

March 13th, 2023

Reappears on tracking south of Novorossiysk, Russia

Makes way to Tsemes Bay, Russia on March 18th, 2023

Enters Novorossiysk, Russia on March 20th, 2023

Leaves March 22nd, 2023

March 23rd, 2023

Istanbul Anchorage, Türkiye

3 days

March 29th, 2023

Re-Enters Laconian Gulf, Greece

1 day

March 30th, 2023

Engages in looping maneuvers to the south and west of Laconian Gulf, Greece

7 days

April 6th, 2023

Enters near Neapoli, Italy

Re-enters sea west of the Laconian Gulf, Greece

April 6th, 2023

Engages in looping maneuvers to the west of the Laconian Gulf, Greece

4 days

April 11th, 2023

Departs

April 13th, 2023

Arrives at the anchorage southwest of Istanbul, Türkiye

Bunkers with *Melisa G* and *Orbay*

1 day

April 14th, 2023

Crosses the Bosphorus Straits

1 day

April 15th, 2023

Engages in looping maneuvers and periodically disappears off tracking northeast of the Bosphorus Straits

4 days

April 19th, 2023

Reappears on tracking southwest of Novorossiysk, Russia

Continues to periodically disappear off tracking until within Taman Anchorage area, Russia

1 day

April 20th, 2023

Departs from the Taman Anchorage area, Russia

April 21st, 2023

Enters Novorossiysk Anchorage, Russia

Engages in looping maneuvers

1 day

April 22nd, 2023

Enters Novorossiysk Port, Russia

2 days

April 26th, 2023

Enters Istanbul Anchorage, Türkiye

7 days

Looping maneuvers

May 3rd, 2023

Heads towards Greece

2 days

May 5th, 2023

Enters Laconian Gulf, Greece

Engages in STS transfers

Harbiye (May 7 + May 20) STS transfer with *PM Bradley*. *PM Bradley* drifts around the Black Sea for two months before entering Novorossiysk port, Russia

Bianca (May 9) STS transfer with *Nanda Devi*

Beast (May 11) to Alexandria, Egypt, then to Novorossiysk, Russia

Helen Chem (May 19) STS transfer with *Sauri* (May 20), STS transfer with

Popi P (May 23), then entering Saudi Arabia

Georgia (May 24) to Alexandria, Egypt

Portofino (June 1 + June 4) STS transfer with *Namrata* (June 8), then entering Saudi Arabia

Departs Laconian Gulf, Greece (June 5)

June 7th, 2023

Gulf of Gabes, Tunisia

4 days

June 2023

Taman, Russia

July 2023

Korfez, Türkiye

August 2023

Constanta, Romania

Tuapse, Russia

September 2023

Lome, Togo

STS transfer with *Matrix Triumph*

October 2023

Primorsk, Russia

Konya (formerly *Besiktas Bosphorus*)



Figure 2. Konya, Marinetraffic.com/ Plague Christian

Manager: BESIKTAS DENIZCILIK TASIMACILIK SANAYI VE TIC

Owner: (Recently sold from BESIKTAS DENIZCILIK TASIMACILIK SANAYI VE TIC; possibly BOSPHORUS SHIPPING AND TRADING LTD)

Beneficial Owner: Unknown

Insurance/Club: Standard P & I Club

Classification Society: American Bureau of Shipping

Summary of Activity

Crude Accountability tracked the *Konya* between July 2022 and February 2024. During that time, the tanker entered four Russian ports: Novorossiysk, Taman, Retinskoye, and Murmansk. The ship made additional port calls at five non-Russian ports: Trieste, Taranto, Livorno, Fujairah, and Lanshan. Crude Accountability tracked an additional three ship-to-ship transfers conducted, including one within the Greek Laconian Gulf.

Significance of Activity

The *Konya* collected Russian oil products from three Russian ports: Novorossiysk, Retinskoye, and Murmansk, and from ship-to-ship transfers near the ports of Taman and Retinskoye. These products were transported to five non-Russian ports: Trieste, Taranto, Livorno, Fujairah, and Lanshan, three of which are located within the EU. An additional STS transfer was conducted within Greek waters of the Laconian Gulf. This means that the ship, along with its Western-based insurance, may have violated sanctions against the Russian Federation, should it have sold any Russian oil products above the established \$60 per barrel limit. Additionally, the ship continued to support the Russian oil industry and thus the Russian war effort. This also means that as late as May 2023, the EU continued to facilitate Russian oil sales within its boundaries.

Activity Flagged

May 2nd, 2023

Port of Taman, Russia

STS transfer with *Sea Marine* (May 8th) - *Sea Marine* came from Novorossiysk, Russia

6 days

May 14th, 2023

Laconian Gulf, Greece

STS transfer with *Jumbo* (May 16th - May 19th), STS transfer with *Chongchon* + *Emerald* (May 30th), then enters Tunisia

5 days

September 15th, 2023

Retinskoye, Russia

STS transfer with *Vasily Dinkov*

2 days

December 20th, 2023

Retinskoye, Russia

1 day

February 29th, 2024

Murmansk, Russia

2 days

Claudia Gas



Figure 3. Claudia Gas, Marinetraffic.com/ Michael Warrick

Manager: Zeus Lines Management SA

Owner: Zeus Lines Management SA

Beneficial Owner: Zeus Lines Management SA

Insurance/Club: The West of England Shipowners

Classification Society: Korean Register of Shipping

Summary of Activity

Crude Accountability tracked the *Claudia Gas* between July 2022 and January 2024. During that time, the tanker entered two Russian ports: Taman and Ust-Luga, and two Turkish ports: Dortyol and Trabzon. Crude Accountability tracked an additional two ship-to-ship transfers in the Greek Laconian Gulf.

Significance of Activity

The *Claudia Gas* collected Russian oil products between the ports of Taman and Ust-Luga. These products were brought to two Turkish ports seven times over the timeline. Additionally, two ship-to-ship transfers were conducted within Greek territorial waters, the Laconian Gulf. This, along with the retention of the ship's Western-based insurance, The West of England Shipowners, means that the ship may have violated sanctions against the Russian Federation, should it have sold any Russian oil products above the established \$60 per barrel limit. Additionally, the ship continued to support the Russian oil industry and thus the Russian war effort. The ship's repeated entry into Turkish ports and the STS transfers conducted within EU boundaries suggest that both Türkiye and the EU have continued to facilitate the Russian oil trade.

Activity Flagged

April 7th, 2023

Port of Taman, Russia

4 Days

April 18th, 2023

Kinet Hoyuk, Türkiye

1 day

April 27th, 2023

Port of Taman, Russia

3 days

May 2nd, 2023

Near Yesilyali, Türkiye

1 day

May 5th, 2023

Port of Taman, Russia

5 days

May 16th, 2023

Kinet Hoyuk, Türkiye

2 days

May 24th, 2023

Port of Taman, Russia

4 days

June 2nd, 2023

Kinet Hoyuk, Türkiye

6 days

June 15th, 2023

Port of Taman, Russia

6 days

July-September 2023

Djibouti

Yemen

Algeria

Kinet Hoyuk, Türkiye

September 20, 2023

Laconian Gulf, Greece

STS transfer with *Vivet Dubhe*

1 day

October 2023

Djibouti

Yemen

November 20th, 2023

Laconian Gulf, Greece

STS transfer with *Reference Point*

1 day

November 24th, 2023

Kinet Hoyuk, Türkiye

1 day

January 17th, 2024

Port of Ust Luga, Russia

2 days

Delta Poseidon



Figure 4. Delta Poseidon, Marinetraffic.com/Oguz Eroguz

Manager: Delta Tankers LTD

Owner: Delta Poseidon Special Maritime Enterprise (ENE)

Beneficial Owner: Delta Tankers LTD

Insurance/Club: Assuranceforeningen Gard

Classification Society: China Classification Society

Summary of Activity

Crude Accountability tracked the *Delta Poseidon* between November 2022 and January 2024. During that time, the tanker entered the Russian port of Novorossiysk five times and conducted three ship-to-ship transfers within the Greek Laconian Gulf and the Port of Rotterdam. Additionally, the tanker entered five non-Russian ports, one of which is located in the EU.

Significance of Activity

The *Delta Poseidon* entered the Russian port of Novorossiysk in late March 2023. Crude Accountability was able to observe that the tanker docked at the CPC offshore terminal in this instance. Oil products from this terminal, and from the port of Novorossiysk another four times, were transported to four other ports, Rotterdam (Netherlands), Tutunciftlik (Türkiye), Sikka / Mundra (India), and Ulsan (South Korea). Additionally, two ship-to-ship transfers were conducted in Greek territorial waters, within the Laconian Gulf. These transfers were made with the ships *Kriti Rock* and *T. SUNA* on July 10th and November 14th, 2023, respectively. The tanker transferred Russian oil products within EU territory on three occasions within the timeline. One transfer was at the Port of Rotterdam, Netherlands, and the other two transfers were conducted within the Laconian Gulf, Greece. Additionally, *Delta Poseidon* maintained Norwegian-based insurance, Assuranceforeningen Gard, while conducting this activity. One important factor to consider is that the CPC terminal from the port of Novorossiysk is not under sanctions. The use of Norwegian-based insurance, in addition to transferring Russian oil products within EU territory, may suggest sanctions violations if those products were sold above the \$60 per barrel limit. This activity does indicate that the EU, along with Türkiye, India, and South Korea continue to support the Russian fossil fuel industry and thus the Russian war effort.

Activity Flagged

April 20th, 2023

Rotterdam, Netherlands

1 day

May 8th, 2023

Las Palmas de Gran Canaria, Canary Islands

<1 day

May 19th, 2023

Off the Nigerian Coast

4 days

June 5th, 2023

Tarragona, Spain

2 days

June 14th, 2023

Athens, Greece

Bunkering

4 days

June 25th, 2023

Off the coast of Novorossiysk, Russia

Blips in and out of AIS range

Appears to dock with the CPC terminal

2 days

June 30th, 2023

Korfez, Türkiye

1 day

July 8th, 2023

Aliaga, Türkiye

1 day

July 10th, 2023

Laconian Gulf, Greece

STS transfer with *Kriti Rock*

1 day

July 12th, 2023

Athens, Greece

Bunkering

5 days

July 25th, 2023

Off the coast of Gelendzhik, Russia
Odd drifting patterns
Gaps in AIS data showing the ship ashore
10 days

August 22nd, 2023

Port of Sikka / Port of Mundra, India (off coast)
3 days

September 4th, 2023

Port of Fujairah, UAE (off coast)
<1 day

September 6th, 2023

Off the coast of Kuwait
3 days

October 28th, 2023

Off the coast of Novorossiysk, Russia (no indication of pulling into CPC terminal)
3 days

November 12th, 2023

Aliaga, Türkiye
<1 day

November 14th, 2023

Laconian Gulf, Greece
STS transfer with *T. SUNA*
1 day

November 16th, 2023

Athens, Greece
Bunkering
3 days

December 1, 2023

Off the coast of Novorossiysk, Russia

Odd drifting patterns

9 days

January 23rd, 2024

Ulsan, South Korea

2 days

Delta Spirit



Figure 5. Delta Spirit, Marinetraffic.com/ Manuel Hernández

Manager: Delta Tankers LTD

Owner: Delta Tankers LTD

Beneficial Owner: Luminous Marine S.A.

Insurance/Club: Assuranceforeningen Gard

Classification Society: China Classification Society

Summary of Activity

Crude Accountability tracked the *Delta Spirit* between July 2022 and January 2024. During that time, the ship entered the Russian port of Novorossiysk five times and made five entries into non-Russian ports. Two entries were made into Jamnagar (India), two into Ningbo Port (China), and one into Rotterdam (Netherlands). The latter is notably within the EU and occurred in November 2023.

Significance of Activity

The *Delta Spirit* acquired oil products from the Russian port of Novorossiysk and transported them to three non-Russian ports across five voyages. As stated, two voyages were to the Indian port of Jamnagar and two were made to the Chinese port of Ningbo. One final voyage was observed to the Dutch, and EU, port of Rotterdam in November 2023. Notably, throughout these voyages, the *Delta Spirit* maintained its Norwegian-based insurance, Assuranceforeningen Gard. *Delta Spirit's* beneficial owner, Luminous Marine SA, is also a registered company within Greece and thus the EU. Considering its entry into an EU port, the retention of its Western-based insurance, and the registration of its beneficial owner, the tanker may have violated sanctions against the Russian Federation should it have sold its contents over the established \$60 per barrel limit. Notably, the Russian port of Novorossiysk has been exempt from harsher sanctions due to its connection to the CPC pipeline. This activity indicates that China, India, and the EU have continued to support the Russian fossil fuel industry and thus the war effort against Ukraine.

Activity Flagged

July 2nd, 2023

Off the coast of Novorossiysk, Russia

2 days

August 10th, 2023

Off the coast of Ningbo Port, Shanghai, China

2 days

November 5th, 2023

Off the coast of Novorossiysk, Russia

5 days

November 29th, 2023

Rotterdam, Netherlands

3 days

December 8th, 2023

Off the coast of Gibraltar

21 days

January 4th, 2024

Athens, Greece

Bunkering

6 days

Echo Beverly Hills



Figure 6. Echo Beverly Hills, Marinetraffic.com/ Raimo Makinen

Manager: Central Mare Inc

Disponent Owner: Trafigura

Financial Owner: China Merchants Bank

Beneficial Owner: Central Mare Inc

Insurance/Club: U.K. Mutual Steam Ship Assurance Association (Bermuda) Ltd

Classification Society: DNV

Summary of Activity

Crude Accountability tracked the *Echo Beverly Hills* between October 2022 and July 2023. During that time, the tanker entered the Russian ports of Ust-Luga and Novorossiysk six times. In between these entries, the tanker made voyages to eight non-Russian ports, Milazzo (Italy), Tutunciftlik (Türkiye), Aliaga (Türkiye),

Ceyhan (Türkiye), Trieste (Italy), Santa Panagia (Italy), Syracuse (Italy), and Marseille (France). Five of these ports are within the EU. On May 16th, 2023, the *Eco Beverly Hills* disappeared off tracking for two days near the coast of Israel. It is unclear if the ship's AIS tracker was intentionally turned off and what the ship's intended destination was. The *Eco Beverly Hills* returned to the port of Novorossiysk on May 28th, 2023.

Significance of Activity

The *Eco Beverly Hills* acquired Russian oil products from the ports of Ust Luga and Novorossiysk six times throughout the timeline. The tanker then transported those products to eight non-Russian ports, entering Tutunciftlik and Aliaga (Türkiye) at least twice. Through the transport of these Russian oil products, *Eco Beverly Hills* maintained British-based insurance; originally Britannia Steam Ship Insurance Association Ltd until February 2023, followed by its current insurance under U.K. Mutual Steam Ship Assurance Association (Bermuda) Ltd. The combination of transporting Russian oil products, especially from the sanctioned port of Ust Luga, to ports within Türkiye and the EU, while maintaining Western-based insurance, classification certification, and ownership suggests possible sanctions violations should those products have been sold over the established \$60 per barrel limit. This information also demonstrates that actors in the West, the EU included, continue to facilitate and profit off of the Russian oil trade.

Activity Flagged

May 10th, 2023

Off the coast of Novorossiysk, Russia

1 day

May 16th, 2023

Off the coast of Israel

AIS nondetectable (possibly switched off)

2 days

May 28th, 2023

Off the coast of Novorossiysk, Russia

2 days

June 4th, 2023

Syracuse, Italy

1 day

June 9th, 2023

Marseille, France

1 day

June 23rd, 2023

Tubruq, Libya

1 day

July 5th, 2023

Pembroke Oil Refinery, UK

2 days

July 12th, 2023

Gran Canaria

2 days

July 22nd, 2023

Off the coast of Ghana

Roughly 8 days

Gea



Figure 7. Gea, Marinetraffic.com/Sinisa Aljinovic

Manager: Ionia Management SA

Disponent Owner: Ionia Management SA

Beneficial Owner: Ionia Management SA

Insurance/Club: Assuranceforeningen Skuld Norway

Classification Society: Bureau Veritas

Summary of Activity

Crude Accountability tracked the Gea between July 2022 and May 2023. During this period, the Gea entered three Russian ports: Novorossiysk, Taman, and Tuapse, a total of seven times and seven non-Russian ports, Burgas (Bulgaria),

Tutunciftlik (Türkiye), Bizerte (Tunisia), Yesilyurt (Türkiye), Trabzon (Türkiye), Iskenderun (Türkiye), and Mersin (Türkiye). The *Gea* made voyages to Burgas at least three times. In addition, the *Gea* made routine visits to the Laconian Gulf, encompassed by the areas around Kalamata OPL and Vatika Bay. One voyage to this area included a confirmed ship-to-ship transfer with the *St. Nikolai* on May 18th, 2023.

Significance of Activity

The *Gea* acquired Russian oil products from three Russian ports, two of which are subject to sanctions: Taman and Tuapse. The *Gea* then transported these products to at least seven non-Russian ports. Notably, Bulgaria is not subject to restrictions on Russian oil. The *Gea* also transported and transferred these Russian oil products within EU waters, particularly within the Laconian Gulf of Greece. The *Gea* maintained its Norwegian-backed insurance, Assuranceforeningen Skuld, throughout the entirety of this activity, as well as its French-based classification society, Bureau Veritas. Should the *Gea* have sold its acquired Russian oil products above the price of \$60 per barrel, particularly from the ports of Taman and Tuapse, while maintaining its Western insurance and classification certificate, and retaining ownership by an EU company, the tanker may have violated sanctions against the Russian Federation. In addition, the repeated entry into Turkish ports and EU waters, particularly within the Laconian Gulf, demonstrates that both Türkiye and the EU continued to facilitate the Russian oil trade as late as May 2023.

Activity Flagged

April 24th, 2023

Novorossiysk, Russia

2 days

May 2nd, 2023

Iskenderun, Türkiye

2 days

May 4th, 2023

Mersin, Türkiye

3 days

May 12th, 2023

Burgus, Bulgaria

2 days

May 17th, 2023

Laconian Gulf, Greece

STS transfer with *St. Nikolai* (May 18th)

1 day

Hamsi



Figure 8. Hamsi,Marinetraffic.com/ Knut Helge Schistad

Manager: OOO Prisco Tankers

Disponent Owner: OOO Prisco Tankers

Beneficial Owner: Primorsk Shipping Corp Prisco

Insurance/Club: Assuranceforeningen Skuld Norway

Classification Society: Russian Maritime Register of Shipping

Summary of Activity

Crude Accountability Tracked the *Hamsi* between April and November of 2023. The *Hamsi* rarely made port calls but conducted an unprecedented number of ship-to-ship transfers during tracking. The *Hamsi* conducted twenty-six ship-to-

ship transfers during the tracking period and pulled into Greek ports six times. These ports are the Corinth Oil Refinery and the Piraeus Container Terminal. In each of the instances of ship-to-ship transfers, the *Hamsi* labeled each maneuver as “bunkering” which is typically equivalent to “refueling” for most motorized vehicles. In these instances, the ship would be “bunkered” by Russian ships in between the ports of Taman and Novorossiysk, followed by bunkering by Turkish ships off the southern coast of Türkiye. The *Hamsi* would only “bunker” prior to a voyage to either of the above-mentioned Greek ports and would only re-bunker after returning to the portion of the Black Sea between the ports of Taman and Novorossiysk.

Significance of Activity

The *Hamsi* regularly received Russian oil products, indicated as “bunkering” before entering Greek ports. The *Hamsi* would receive multiple ships for its “bunkering,” as many as six bunkerings would take place on its repeated voyage to the Corinth Oil Refinery and Piraeus Container Terminal. Throughout the timeline of its activity, the *Hamsi* maintained its Norwegian-based insurance, Assuranceforeningen Skuld. In normal circumstances, and as demonstrated in previous entries to the dossier, ship-to-ship transfers are labeled “ship-to-ship transfers” or STS transfers. Bunkering is a separate category of transfer that is typically used to refuel a ship. However, the *Hamsi* never made port calls to Novorossiysk or any other port to receive oil products. The *Hamsi* only ever conducted “bunkerings” with multiple ships while on its way to the above-mentioned Greek ports. This is highly suspicious activity and may suggest the *Hamsi* intended to hide the origins of its cargo. The number of bunkerings it received while on its voyages, as many as six on one voyage, is also highly suspicious and further supports the claim that these were not “bunkerings” intended to refuel the ship but rather ship-to-ship transfers intentionally labeled otherwise. Should those products that it received have been sold over the \$60 per barrel limit and should the *Hamsi* failed to indicate the origins of the cargo, the tanker may very well have intentionally violated sanctions against the Russian Federation.

Activity Flagged

April 22nd, 2023

Off the coast of Novorossiysk, Russia

Bunkering

Armada Navigator, April 23rd

Nikolay Gamayunov, April 24th

Nikolai Velikiy, April 26th

4 days

May 3rd, 2023

Istanbul, Türkiye

Bunkering

Su Deryasi 4, May 4th

Alsancak 2, May 4th

2 days

May 8th, 2023

Corinth Oil Refinery, Greece

2 days

May 17th, 2023

Off the coast of Novorossiysk, Russia

Bunkering

Nikolay Gamayunov, May 18th

Nikolay Velikiy, May 18th

Nikolay Gamayunov, May 19th

3 days

May 30th, 2023

Istanbul, Türkiye

Bunkering

Su Deryasi

Zeynabim

Pasha 5

1 day

June 3rd, 2023

Corinth Oil Refinery, Greece

1 day

June 11th, 2023

Off the coast of Novorossiysk

Nikolay Velikiy (June 11th)

Nikolay Gamayunov (June 15th)

Nikolay Velikiy (June 17th)

Nikolay Velikiy (June 18th)

June 21st, 2023

Istanbul, Türkiye

Su Deryasi

Pasha 5

June 26th, 2023

Corinth Oil Refinery, Greece

1 day

July 18th, 2023

Off the coast of Novorossiysk, Russia

Bunkering

Armada Navigator (July 18th)

Nikolay Velikiy (July 19th)

2 days

July 22nd, 2023

Istanbul, Türkiye

Bunkering

Su Deryasi

1 day

July 29th, 2023

Corinth Oil Refinery, Greece

1 day

August 4th, 2023

Off the coast of Taman

Bunkering

Nikolay Velikiy (August 5th)

Nikolay Gamayunov (August 11th)

Armada Navigator (August 16th)

13 days

August 20th, 2023

Istanbul, Türkiye

Bunkering

Su Deryasi

1 day

August 23rd, 2023

Piraeus Container Terminal, Greece

3 days

August 31st, 2023

Nikolay Gamayunov (August 31st)

Nikolay Velikiy (September 3rd)

3 days

September 11th, 2023

Piraeus Container Terminal, Greece

3 days

Continued trips to Novorossiysk and Athens area into November 2023

Conclusion

There is a compelling pattern among the eight ships tracked by Crude Accountability. All eight engaged in the transport and sales of Russian oil within EU waters, whether via port or via ship-to-ship transfers. Seven of the eight ships conducted ship-to-ship transfers within the Laconian Gulf of Greece. All eight ships used Greek territorial waters to facilitate the sale of Russian oil. All eight ships are insured by companies in Norway and the UK. Several of the ships also operate under American, French, and Norwegian classification societies. Five of the ships are owned by entities in Greece, one from the Marshall Islands -but with a main office in Greece-, one from Türkiye, and one from Russia. No publicly accessible information is available on the sale of oil from any of these ships. The opaque nature of the shipping industry and especially the oil shipping industry obscures whether these ships violated sanctions. The distinct lack of public information on oil sales from these tankers creates a blind spot for watchdog organizations and a potential loophole for sanctions evasion.

What is clear, however, is that companies operating within the EU and the West, as a whole, profit off of the war in Ukraine via these tankers. Oil sales continue to supply the Russian war machine with funding.

The pervasiveness of ship-to-ship transfers within the Laconian Gulf raises a serious risk of oil spills and the subsequent environmental damage. More must be done by the participating states of the OSCE, which facilitate these oil sales and ship-to-ship transfers within their borders, not only to curb potential sanctions evasion but to regulate this very serious environmental and climate risk. Civil Society must play its role as a watchdog in this matter, further identifying and documenting the ships that continue to facilitate the Russian oil trade, but also maintaining vigilance and raising the alarm should these ship-to-ship transfers cause harm to the Laconian Gulf.

Recommendations

For OSCE participating states

Greater regulatory efforts must be put into place concerning insurance companies, shipping companies, and classification societies within participating state national territories. These efforts should work to hold the aforementioned accountable for any possible sanction violations that might occur within or without the national territory of the participating states.

A publicly accessible monitoring system should be in place to track the sale of Russian oil within participating state territories. In particular, the sale price, origin, and all ships involved in its transport to Western ports should be documented and made available to the public.

For Civil Society

Greater efforts must be employed to watch for ship-to-ship transfers occurring within respective national territories. Civil society should serve as watchdogs in this manner, developing a coherent list of ships, ports, and territorial waters involved in the continued Russian oil trade via ship-to-ship transfers.

Within the territories identified for ship-to-ship transfers, civil society should maintain vigilance for signs of oil spillage, regardless of how small. If Russian oil is being spilled in national or international waters, affecting the sea and the livelihoods of those people around the sea, the public deserves to understand where this damage may come from and from whom.

Appendix

The following is a collection of 17 ships identified by Crude Accountability as likely being associated with the Russian shadow fleet, but which we did not specifically track. Two of these ships, the *Nanda Devi* and the *Sagitta*, have been identified by the US government as part of the Russian shadow fleet and have subsequently been sanctioned.

Myra

Super G

Jumbo

Lucky Sailor

Melogy

Nanda Devi

Nargis

New Friendship

Nobel

Palladium

Ryman

Sagitta

Scylla

Simba

Stamos

STI Finchley

Novorossyisk affiliated: *New Amorgos*

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