

Targeting the so-called Russian shadow fleet has been an integral part of several sanctions packages against Russia adopted by the Council. The most recent 16th package of sanctions against Russia, adopted by the Council 24 February 2025, which was designed to further ramp up pressure on the aggressor, touches upon vital sectors of the Russian economy such as energy, trade, transport, infrastructure and financial services and introduces further measures aimed at tackling circumvention. In this latter respect, the 16th package adds further vessels to the list of those subject to a port access ban and a ban on the provision of a broad range of services related to maritime transport. This concerns non-EU tankers which are part of Russia's shadow fleet circumventing the oil price cap mechanism while conducting irregular and high-risk shipping practices – thus possibly posing safety and/or environmental risks –, support the energy sector of Russia, or vessels that are responsible for transporting military equipment for Russia or stolen Ukrainian grain. In total, 153 vessels from third countries are currently listed.

The Council explicitly acknowledges the environmental risks posed by Russia's shadow fleet. Those risks have in particular been flagged by the International Maritime Organisation in its General Assembly resolution A.1192(33), adopted on 6 December 2023. Recital 6 of Council Decision (CFSP) 2025/388 of 24 February 2025 indicates that 'for the purposes of those oil exports, Russia is increasingly reliant on a fleet of vessels involved in substandard and high-risk shipping practices such as operating with inadequate or inexistent insurance ('shadow fleet'). Those vessels pose significant maritime safety and environmental risks for the Union, its coastal Member States and third-country coastal states. [...] Discouraging persons and entities from undertaking and facilitating high-risk shipping practices when transporting Russian-origin oil and disrupting shadow

fleet operations therefore contribute to undermining revenue generation for the Russian war efforts while at the same time supporting international measures to preserve and improve the quality of the environment'. This is why the Council introduced a new listing criterion as part of the 16th package targeting those who support the operations of tankers transporting Russian oil while conducting irregular and high-risk shipping practices as set out in the International Maritime Organisation General Assembly resolution A.1192(33). The objective is to disrupt the network behind the too-often unsafe oil tankers that now widely support Russian oil exports, which will help in turn to address circumvention of the oil price cap and environmental risks linked to the shadow fleet.