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**INTERRELATION OF MARITIME SECURITY  
AND ECONOMIC, ENVIRONMENTAL, FOOD,  
INFORMATION, AND ENERGY SECURITY  
OF THE BALTIC-BLACK SEA STATES**

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**SANCTIONS EVASION IN THE BLACK SEA LOGISTICS  
SECURITY SYSTEM**

**УХИЛЕННЯ ВІД САНКЦІЙ У СИСТЕМІ БЕЗПЕКИ ЛОГІСТИКИ  
ЧОРНОГО МОРЯ**

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According to UNCTAD, 80% of goods on store shelves arrive via sea channels [1]. This makes maritime space a key international trade area for the movement of goods and services. The military blockade of the Black and Azov Seas during the Russian aggression made it impossible to maintain maritime logistics and created systemic risks in supply chains.

After the beginning of the Russian invasion of Ukraine, the import of Russian oil into the EU was not banned; the sanctions only concerned the ban on EU vessels transporting oil from Russian ports, as well as the ban on Russian vessels, including tankers, entering EU ports. Already in March 2022, major shipping companies Maersk, Hapag Lloyd, MSC, HMM began to declare that they refused to work with the Russian Federation. The first decision to close their ports to vessels flying the Russian flag or related persons was made by the United Kingdom, followed by Canada. The reaction to Russia's attack on Ukraine was also from international associations, such as IMO, which excluded Russia from its membership, and even from individual port workers' unions. Then, in one month, global maritime traffic from the Russian Federation decreased by 58% [2].

In April, another package of EU sanctions was adopted, which included a provision [3] that entry into the sea and river ports of the European Union is

prohibited for all vessels registered under the Russian flag. And it would seem that such measures should have a significant impact on the work of Russian ports. However, the data at the end of 2022 were not encouraging, since Russia did not reduce, but on the contrary increased cargo transshipment by 0.7%, and for the ports of the Azov-Black Sea basin this figure increased by 2.7%. In terms of cargo, according to the results of the year, there was an increase in transshipment for coal (by 1.8%), ore (6%), oil (7.5%) and liquefied gas (8.8%). At the same time, Ukraine lost about 60% of the cargo flow of pre-war 2021 during this period [4].

On the one hand, this was possible due to the fact that sanctions were introduced slowly and not for the entire important range of goods, such as, for example, for cast iron. On the other hand, Russia continued maritime trade even despite the sanctions, resorting to various schemes. One of them is “gray” transshipment at sea from one vessel to another. For example, in April 2022, the maritime authorities of Barcelona refused entry to the port of the Black Star vessel under the Maltese flag due to the fact that it had previously conducted a Ship-to-Ship operation with a vessel under the Russian flag. A similar situation occurred in Spain in February of this year, when the container ship Maersk Magellan was not allowed into the port, which was carrying cargo that was previously on the Nobel vessel, which until July 1, 2022 sailed under the Russian flag, and later changed it to the Cameroonian one. Another case in February of this year occurred in Albania in the port of Durres. A tanker was detained there, transporting 22.5 thousand tons of oil in circumvention of EU sanctions [5].

On December 16, 2024, the European Union finally adopted the 15th package of sanctions against Russia, with the aim of further restricting Russia’s ability to wage an “illicit, unprovoked and unjustified war of aggression against Ukraine”. It prohibits the provision of services for the transportation of Russian oil by sea, as well as its insurance, brokerage and financing. A similar ban was imposed by the G7 countries (Great Britain, Germany, Italy, Canada, France, Japan and the United States). At the same time, a price limit for Russian oil was adopted [6].

The restrictive measures are primarily aimed at strengthening the fight against Russia’s “shadow fleet”, schemes to circumvent already imposed restrictions, combating organizations and individuals, including Chinese ones, that help Russia evade sanctions, and weakening the Russian military-industrial complex [7].

As of Q1 2024, 435 vessels are part of the Russian shadow fleet – they are not owned, operated or insured by the countries of the sanctions coalition. Therefore, they are not subject to the price cap. 185 vessels transport crude oil and 250 tankers transport petroleum products. To form its own shadow fleet, Russia has used three key ways, including involving third countries:

1. Transfer to new managers of tankers previously owned by Russian companies;
2. Vessels from the “white” fleet (with IG P&I insurance) that are over 15 years old;
3. Very old tankers (over 20 years old) from the “shadow” or “white” fleet that would otherwise have been decommissioned [8].

Currently, Russia’s shadow fleet poses a threat to European security, the economy, and the environment, so there is a growing need to develop coordinated measures to deter it and counter Russia’s evasion of sanctions.

Thus, the analysis of existing cases of sanctions evasion revealed the cause-and-effect relationships of the development of illicit trade with the aim of circumventing sanctions through legal and illegal logistics sales channels, including on the basis of regional trade agreements between Russia and third countries. Among them were identified:

1. Corridors of “gray” zones of military conflicts;
2. Uncontrolled transshipment logistics bridgeheads of intermediary countries at sea;
3. Distortion of information about the country of origin of goods and/or services;
4. Open smuggling with the participation of government officials;
5. Dropshipping intermediary schemes for the sale of goods from sanctioned countries in small batches;
6. Lack of developed mechanisms for controlling e-commerce and digitalization of money.

The basis for circumventing sanctions was the conclusion of regional agreements between countries under sanctions and countries not under sanctions to solve the problems of logistics of Russian raw materials, since the identification of the real exporter in such logistics chains is impossible or changed. Empirical studies of the practice of evading sanctions using logistics schemes for illicit trade in sanctioned raw materials demonstrate the leveling of their effect over time, which leads to a deepening of adaptation to illicit schemes and the production of new ones, which are mostly beneficial to the country under sanctions and players in illicit logistics schemes.

As a result, it was found that the introduction of sanctions against Russia began to be accompanied not only by logistical games based on energy blackmail, trade blockades, political intrigues, but also by a crisis in the security of shipping in the Black Sea. Incidents of evasion of sanctions in the light of the latest sixteenth package demonstrate the need to shift the emphasis of state policy. Priority should be given not only to methods of economic struggle, but also to measures to ensure the safety of people, ships, cargo and the marine environment in response to the created shadow fleet and a hybrid form of smuggling of raw materials from the Russian Federation.

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