



IUMI Policy Agenda

15. Sanctions

Brief description

International sanctions as a tool for countries to act against others for political reasons influence the global maritime industry on a daily basis.

While sanctions are nothing new, the targeting of financial services have demonstrated the need for marine insurers to keep up to date with new sanction regimes and how to comply with them.

Unfortunately, the picture is further complicated by anti-blocking legislation as promulgated by the EU, which was subject to recent consultation to potentially strengthen its application, and more recently, China. The interaction of USD trades and Chinese legislation, if widely enforced, will be far reaching.

Several markets have issued optional sanctions clauses to comply with these regimes. In addition, proper due diligence is recommended for individual insurers. In December 2021, Lloyd's published updated Enhanced Due Diligence (EDD) guidelines for marine insurers introducing:

- updated risk factors for underwriters and compliance personnel to be aware of,
- updated due diligence procedures, and
- revised enhanced due diligence measures, and where appropriate, suggested controls.

The list below, while not necessarily complete, provides guidance on where information can be found from four key sanction regimes.

Key sanction regimes – information links

- **United Nations:**
 - [Security Council - General Information about Sanctions](#)
- **United States of America:**
 - [U.S. Office of Foreign Assets Control \(OFAC\) Sanctions List Search](#)

- [U.S. Treasury OFAC Sanctions Programs](#)
- [U.S. Treasury OFAC Recent Actions](#)
- [OFAC Special Designated Nationals \(SDN\) List](#)
- [OFAC Guidance to address illicit shipping and sanctions evasion practices \(14 May 2020\)](#)
- **European Union:**
 - [EU Consolidated list of sanctions](#)
 - [Updated blocking statute in support of Iran nuclear deal, 6 August 2018.](#)
 - [EU Sanctions Map](#)
 - [Amendment of the Blocking Statute – consultation 9 September – 4 November 2021.](#)
- **United Kingdom:**
 - [HM Treasury – Financial sanctions targets by regime](#)
 - [UK Office of Financial Sanctions Implementation](#)
 - [OFSI Financial sanctions guidance for entities and individuals operating within the maritime shipping sector \(December 2020\)](#)
 - [New legislation after transitional period \(end 2020\)](#)
 - [Lloyd's Marine sanctions guidance – Enhanced Due Diligence measures](#)
- **IUMI:**
 - [OFAC webinar 10 June 2020](#)
 - [Sanctions update webinar \(HFW and Windward\), 8 December 2021.](#)
- **BIMCO:** [Sanctions clause for container vessel time charter parties 2021.](#)
- **CHINA:** [Anti-foreign sanctions law necessary to fight hegemonism, power politics: official.](#)