

News 28 Mar, 2025

"EU Operators" - Reporting Requirements



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Reference has been made in the recent 16th EU sanctions package to "EU operators".

This in relation to the notification requirement of "EU operators" for excepted cargoes under the 16th package, namely;

Operators shall inform the competent authority of the Member State where they are incorporated or under whose law they are constituted of any transaction concluded pursuant to paragraph 3 or 4 within 2 weeks of its conclusion

(paragraph 5 of Article 5ae of Council Regulation (EU) 833/2014).

The term *EU operator* is not defined in the Regulations.

Basis however other references in FAQs an EU operator would include;

all EU vessels, i.e. EU flagged vessels, and also vessels that are owned, chartered and/or operated by EU companies or nationals. This would also cover agents acting on their behalf

In the event of an EU Member/vessel/operator being involved in an incident at a Russian port listed in the Regulation, the EU Member would need to show to the Club that the underlying Article 5ae(3) activity has been reported to their State Authority.

Russia Sanctions

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