

# GCC Offshore STS & Compliance Vetting Protocol

Risk Mitigation Standards for Ship-to-Ship Operations, P&I Cover Verification, and Shadow Fleet Vetting in the Gulf of Oman

## 1. 5-STEP COMPLIANCE CHECKLIST FOR SHADOW FLEET RISK MITIGATION

Surging offshore Ship-to-Ship (STS) operations off Fujairah and the Gulf of Oman require strict due diligence protocols to avoid severe regulatory sanctions, vessel arrest, and loss of insurance coverage.

- 01

**Beneficial Ownership & Management Audit:** Verify ultimate beneficial ownership (UBO), ISM manager, and commercial operator to ensure neither vessel appears on OFAC, EU, or UK sanction lists.
- 02

**P&I Cover Validation:** Confirm standing insurance cover from an International Group (IG) P&I Club or reputable non-IG insurer with verified spill response indemnities (\$1B+ cap).
- 03

**Historical AIS Activity Vetting:** Audit 12-month Automatic Identification System (AIS) historical tracking for deliberate signal gaps, spoofing, or unauthorized STS rendezvous.
- 04

**Flag State & Class Society Verification:** Ensure vessel maintains active classification with an IACS member and is flagged under a compliant, non-blacklisted maritime registry.
- 05

**Terminal & Port Clearance Logs:** Mandate official port authority clearance forms and validated coastal state notifications prior to STS cargo release.

## 2. AIS TRACKING RED FLAGS & DARK ACTIVITY IDENTIFICATION

B2B buyers and charterers must monitor real-time spatial data to detect fraudulent maritime practices commonly associated with non-compliant "shadow fleet" tankers.

| Red Flag Indicator      | Technical Detection Method                                                              | Risk Exposure level | Required Operational Action                                                |
|-------------------------|-----------------------------------------------------------------------------------------|---------------------|----------------------------------------------------------------------------|
| Unexplained AIS Gaps    | Transponder transmission lapses > 4 hours in international waters off Fujairah/Oman.    | CRITICAL            | Reject nomination; demand satellite SAR imagery & bridge logbook copy.     |
| GNSS / AIS Spoofing     | Improbable vessel speed calculation or static position reports during active transit.   | HIGH                | Cross-verify position via LRIT (Long-Range Identification and Tracking).   |
| Frequent Flag Switching | More than 2 flag state transfers within a 12-month operational window ("Flag Hopping"). | MEDIUM-HIGH         | Request formal statement of reasons from vessel owner & class survey logs. |
| Draft Anomalies         | Draft changes registered without corresponding recorded port calls or sanctioned STS.   | HIGH                | Conduct independent surveyor ullage report prior to cargo title transfer.  |

## 3. DOCUMENTATION STANDARDS & SAMPLING PROTOCOLS

Secure cargo transfer requires standardized legal documentation and verifiable sampling protocols to preserve claim rights against P&I Clubs and charterers.

| Required Document / Protocol       | Standard Specification Requirement                                                                 | Validation Entity                          |
|------------------------------------|----------------------------------------------------------------------------------------------------|--------------------------------------------|
| Certificate of Origin (COO)        | Unbroken chain of origin detailing specific refinery/field source; no vague "Offshore UAE" labels. | Chamber of Commerce / Ministry of Energy   |
| P&I Club STS Clearance Certificate | Written confirmation of cover validity for specific STS coordinates and cargo type.                | P&I Club Underwriter / Local Correspondent |

| Required Document / Protocol            | Standard Specification Requirement                                                          | Validation Entity                         |
|-----------------------------------------|---------------------------------------------------------------------------------------------|-------------------------------------------|
| Joint Quality & Sampling Report         | Manifold composite samples taken at beginning, middle, and end of transfer (ISO 3170/3171). | Independent IFIA / TIC Certified Surveyor |
| STS Transfer Checklist (Marpol Annex I) | Completed and signed safety protocol per ICS/OCIMF Ship to Ship Transfer Guide.             | Masters of Mother & Daughter Vessels      |

 **MANDATORY LEGAL CLAUSE FOR CONTRACTS (B/L & C/P)**

"In the event of unannounced vessel substitution, AIS transponder deactivation, or invalidation of P&I insurance during STS operations, Buyer reserves the right to suspend payment, declare Force Majeure, and demand full financial indemnity for consequential seizure or regulatory fines."