



Office of  
Deputy Commissioner of  
Maritime Affairs

# THE REPUBLIC OF LIBERIA

## LIBERIA MARITIME AUTHORITY

22980 Indian Creek Drive  
Suite 200  
Dulles, Virginia 20166, USA  
Tel: +1 703 790 3434  
Fax: +1 703 790 5655  
Email: [Compliance@liscr.com](mailto:Compliance@liscr.com)

**10 December 2025**

**Marine Advisory: 42/2025**

**SUBJECT: Advisory on Russia-Related Sanctions**

**REF: A) OFAC Action, October 22, 2025**  
**B) OFSI Action, October 15, 2025**  
**C) EU Action, October 23, 2025**

**TO: OWNERS, OPERATORS, MASTERS OF LIBERIAN FLAGGED VESSELS**

**Dear Owner, Operator and Master:**

**A)** On October 22, 2025, the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC") imposed full blocking sanctions pursuant to E.O. 14024 against Russian energy companies: PJSC Lukoil Oil Company ("**Lukoil**") and PJSC Rosneft Oil Company ("**Rosneft**"), along with subsidiaries.

<https://home.treasury.gov/news/press-releases/sb0290>

**B)** The United Kingdom's Office of Financial Sanctions Implementation (OFSI) of the HM Treasury, on October 15, 2025, sanctioned companies including but not limited to **Rosneft** and **Lukoil**.

<https://www.gov.uk/government/publications/list-of-russia-sanctions-targets-15-october-2025/list-of-russia-sanctions-targets-15-october-2025>

**C)** The EU, on October 23, 2025, further expanded transactional bans against companies including but not limited to **Rosneft** and **Gazprom Neft** as part of the 19<sup>th</sup> sanctions package.

<https://eur-lex.europa.eu/eli/reg/2025/2033/oj/eng>

WHEREAS, Above sanctions designations and respective companies represent a significant portion of Russia's oil production and output,

And has significant global operations and vast international maritime touchpoints for marine vessels including but not limited to exploration, drilling, extraction, transportation, distribution, bunkering, barge and port operations,

Thus, as a **condition** of the Liberian Flag, all vessels (1) must be in compliance with OFAC sanctions laws and regulations and (2) must be in compliance with other international sanctions jurisdictions, as applicable.

Any vessels deemed to be non-compliant with respective sanctions laws and regulations, will be de-flagged and their related companies annulled from the Corporate Registry.

Moreover, all tankers that load at a Russian port or transact with Russian-origin oil or petroleum products must submit a “[Per-Voyage Attestation](#)”/ RLM 400-02 which accounts for applicable price caps and related sanctions designations.

**Point of Contact**

For further information regarding this Advisory, contact [Compliance@liscr.com](mailto:Compliance@liscr.com).

# PER-VOYAGE ATTESTATION

**RLM 400-02**

Vessel Name / IMO Number:

As the shipowner and/or manager of the above referenced vessel, \_\_\_\_\_ (“Company”) confirms that such vessel has loaded or will load oil or a petroleum product in compliance with the Price Cap Policy set out by the U.S. Department of the Treasury, and, as applicable, the EU and/or UK Price Cap Policies.<sup>1</sup>

Moreover, we attest, based upon appropriate due diligence, that the cargo loaded on Vessel IMO: \_\_\_\_\_ did not have any unauthorized touchpoints with or engage in any prohibited transactions or activities involving OFAC SDN-Listed entities such as Lukoil, Rosneft, and Gazprom Neft, in addition to other entities that may be considered prohibited due to the applicable jurisdiction of the vessel and its parties including but not limited to its owners, managers, etc. as necessary.<sup>2</sup>

\_\_\_\_\_  
Actual or Anticipated Loading Date

\_\_\_\_\_  
Signature of Authorized Representative or Attorney-in-fact

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date

<sup>1</sup> This “Per-Voyage Attestation” is consistent with and pursuant to the OFAC Guidance, dated February 3<sup>rd</sup>, 2023, and revised on December 20<sup>th</sup>, 2023, *OFAC Guidance on Implementation of the Price Cap Policy* and, as applicable, the UK’s OFSI updated price cap and/or EU’s updated price cap, effective September 3<sup>rd</sup>, 2025

<sup>2</sup> This Attestation takes into account OFAC’s designations on October 22<sup>nd</sup>, 2025, The United Kingdom’s Office of Financial Sanctions Implementation (OFSI) of the HM Treasury, on October 15<sup>th</sup>, 2025, The EU’s designations on October 23<sup>rd</sup>, 2025 and all prior sanctions restrictions applicable to the vessel and related parties’ jurisdictions.