4 May 2020

MARINE ADVISORY: 18/2020
(This Marine Advisory supplements Marine Advisories 04/2019 and 12/2019)

SUBJECT: Advisory on Sanctions regarding Petroleos de Venezuela, S.A. (“PdVSA”)

Ref:  
(a) Marine Advisory 04/2019
(b) Marine Advisory 12/2019

On April 21, 2020, the Office of Foreign Assets Control (“OFAC”) issued an amended General License 8F authorizing transactions involving PdVSA necessary for limited maintenance of essential operations in Venezuela or the wind-down of operations in Venezuela for certain entities like Chevron, Halliburton, Schlumberger Limited, Baker Hughes, a GE Company, Weatherford International, Public Limited Company.

The key difference of General License 8F when compared to previous authorizations is that it does not allow for drilling, lifting, or processing of, purchase or sale of, or transport or shipping of any Venezuelan-origin petroleum or petroleum products. Thus, it directly impacts Chevron and any U.S. persons who had been operating under the prior general licenses.

Additionally, the issuance of this amended General License may have an impact on non-U.S. persons. The express exclusion from the license for the “transport or shipping of any Venezuelan-origin petroleum or petroleum products” is likely to impact pending charters involving Chevron or its partners. To the extent Chevron is no longer authorized to ship product out of Venezuela, the carriage of same would not be protected by the license either.

Changes enacted by General License 8F may be interpreted to indicate the growing focus of the United States sanctions policy on Venezuelan-origin petroleum and petroleum products and international shipping. As such, any voyages involving the carriage of these products may present sanction risks.

Point of Contact

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