DEPARTMENT OF STATE | DEPARTMENT OF THE TREASURY | UNITED STATES COAST GUARD

North Korea Sanctions Advisory

Issued: **March 21, 2019**

Title: **Updated Guidance on Addressing North Korea's Illicit Shipping Practices**

The U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), with the U.S. Department of State and the U.S. Coast Guard, is updating the advisory published on February 23, 2018. This advisory provides new information about North Korea's deceptive shipping practices, additional guidance on how to mitigate the risk of involvement in these practices, a new graphic depicting certain ports of call, and three new annexes. The U.S. government recommends that all parties involved in the shipping industry and related commercial entities — including ship owners, managers, and operators, brokers, flag registries, oil companies, port operators, shipping companies, classification service providers, insurance companies, and financial institutions — be aware of the practices set out in this advisory in order to implement appropriate controls to identify North Korea's illicit shipping practices.

Despite robust U.S. and United Nations (UN) sanctions on North Korea, North Korea continues to evade sanctions, particularly through illicit ship-to-ship transfers of refined petroleum and coal. In 2018, North Korean ports received at least 263 tanker deliveries of refined petroleum procured from UN-prohibited ship-to-ship transfers. If these tankers were fully laden when they made their delivery, North Korea would have imported 3.78 million barrels, or more than seven and a half times the allowable amount of refined petroleum (i.e., 500,000 barrels/year) under UN Security Council Resolution (UNSCR) 2397.

In addition to continued illicit imports of refined petroleum, North Korea has resumed exports of coal in the Gulf of Tonkin. UNSCR 2371, adopted in August 2017, prohibits the procurement of North Korean-origin coal, and UNSCR 2397, adopted in December 2017, acknowledges that the proceeds of North Korea's trade in sectoral goods, including coal, contribute to the regime's nuclear weapons and ballistic missile programs. The United States will continue to use its sanctions authorities to target persons in various industries, including, but not limited to, the shipping industry that further North Korea's illicit revenue-generating schemes that fund the regime's nuclear weapons and ballistic missile programs.

This advisory now contains five annexes, three of which are new. The first provides an overview of U.S. and UN sanctions relevant to the shipping industry, including a non-exhaustive list of bases for which persons may be sanctioned by OFAC. The second provides an updated list of 28 North Korean tankers known to be capable of engaging in ship-to-ship transfers of refined petroleum products and other banned goods. The new third annex provides specific guidance for UN Member States and relevant industry actors on best practices to avoid engaging in North

Korea-related illicit activities. The new fourth annex provides a list of 18 vessels that are believed to have engaged in illicit ship-to-ship transfers of refined petroleum with North Korean tanker vessels. The new fifth annex provides a list of 49 vessels that are believed to have exported North Korean-origin coal.

The United States, along with Australia, Canada, France, Italy, Japan, and the United Kingdom, have highlighted these deceptive practices at the International Maritime Organization (IMO) to call all IMO Member States' attention to these deceptive shipping practices, and to remind all Members States of the requirements and guidance contained in relevant IMO instruments. The IMO consequently issued Circular MSC.1/Circ. 1602 on March 5, 2019, to call the attention of all Member States and other maritime industry stakeholders to North Korea's deceptive practices. The United States requests that UN Member States, port state control authorities, and flag registries provide this advisory to all relevant persons in their jurisdictions.

Deceptive Shipping Practices Employed by North Korea

The following are tactics used by North Korea and other illicit actors to obfuscate the identities of vessels and cargo, including origin and destination:

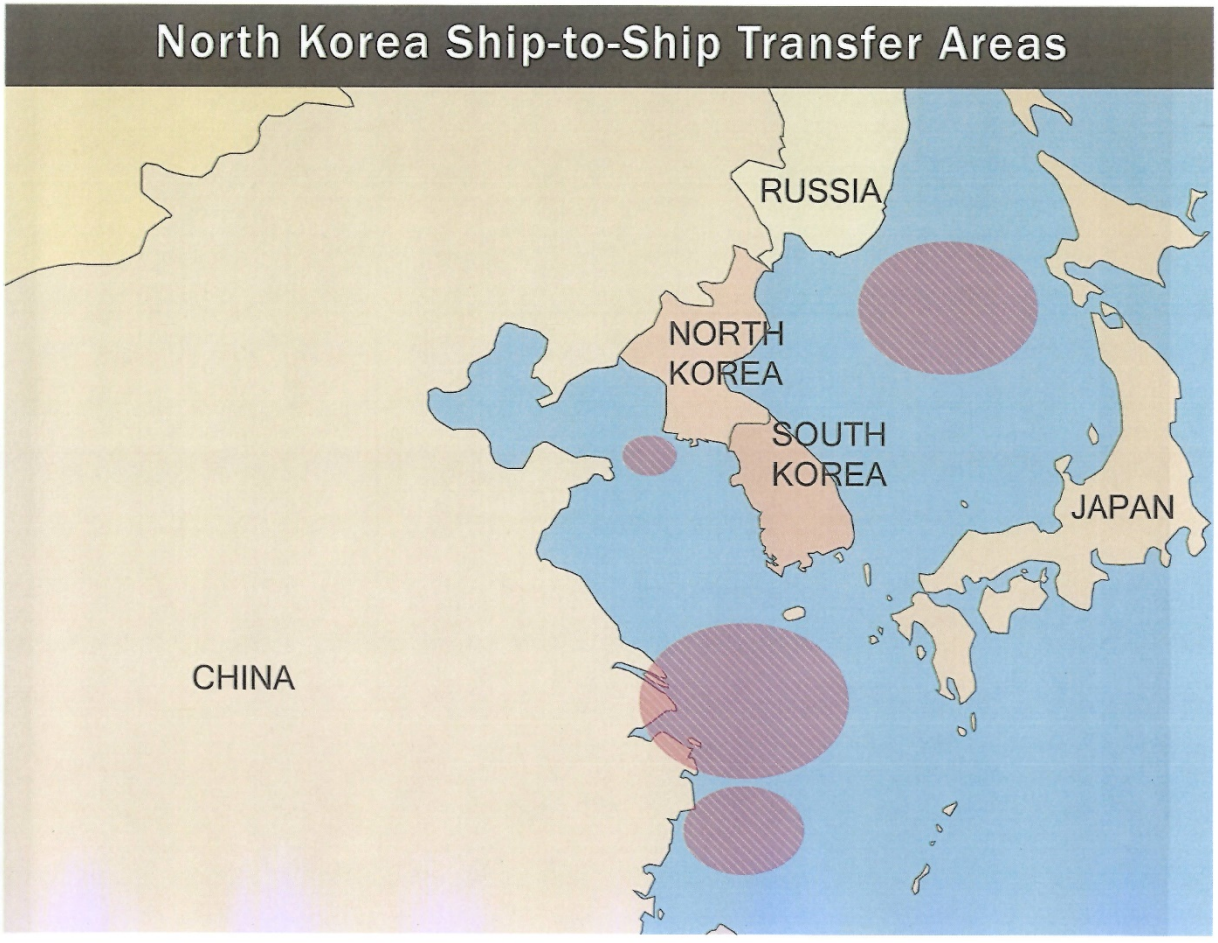
- **Disabling Automatic Identification System (AIS)**: AIS is an internationally accepted maritime safety and navigation-related system that transmits, at a minimum, a vessel's identification and select navigational and positional data via very high frequency radio waves. The International Convention for the Safety of Life at Sea *requires* that certain classes of vessels on international voyages maintain automatic broadcasts. North Korea-flagged merchant vessels often intentionally disable their AIS transponders to mask their movements. Similarly, vessels with which North Korea conducts ship-to-ship transfers will typically disable AIS to evade detection to facilitate illicit trade. This tactic, whether employed by North Korea-flagged vessels or third-country vessels involved in trade with North Korea, is a red flag for potentially illicit activity, as it is a violation of international regulations and is often done to conceal the origin or destination of cargo associated with North Korea. The United Nations Security Council (UNSC) 1718 Committee's Panel of Experts (PoE) issued its report on March 5, 2019 and recommends that protection and indemnity insurance and reinsurance companies and petroleum product trading, refining and producing companies include an "AIS switch-off clause" and AIS screening in contracts for at-risk vessels operating in relevant regions.[1]

- **Physically Altering Vessel Identification**: Maritime vessels meeting certain tonnage thresholds are required to display their name and IMO number (a unique, seven-digit vessel identification code) in a visible location either on the ship's hull or superstructure. A vessel's IMO number is intended to be permanent regardless of a change in a vessel's ownership or name. North Korea-flagged vessels have illegitimately painted over vessel names and IMO numbers to obscure their identities and pass themselves off as different

[1] The UNSC PoE report published on March 5, 2019 can be found here: https://www.un.org/securitycouncil/sanctions/1718/panel_experts/reports.

vessels. As noted in the March 5, 2019 UNSC PoE report, the UN-designated *Yuk Tung* engaged in vessel spoofing by transmitting a false AIS and used the IMO number of a different vessel.

- **Ship-to-Ship Transfers**: A ship-to-ship transfer is the movement of cargo from one ship to another while at sea, rather than in port. Ship-to-ship transfers can conceal the origin or destination of the transferred cargo. North Korea operates a fleet of at least 28 tankers capable of engaging in ship-to-ship transfers of refined petroleum products, and at least 33 ships that are capable of transporting coal. See Annexes 2, 4, and 5 for relevant lists of names and IMO numbers of vessels, though the names are subject to change and the IMO numbers may be obfuscated as North Korea seeks to conceal the identity of vessels engaging in illicit trade. The following map shows the area where ship-to-ship transfers of refined petroleum commonly occur:

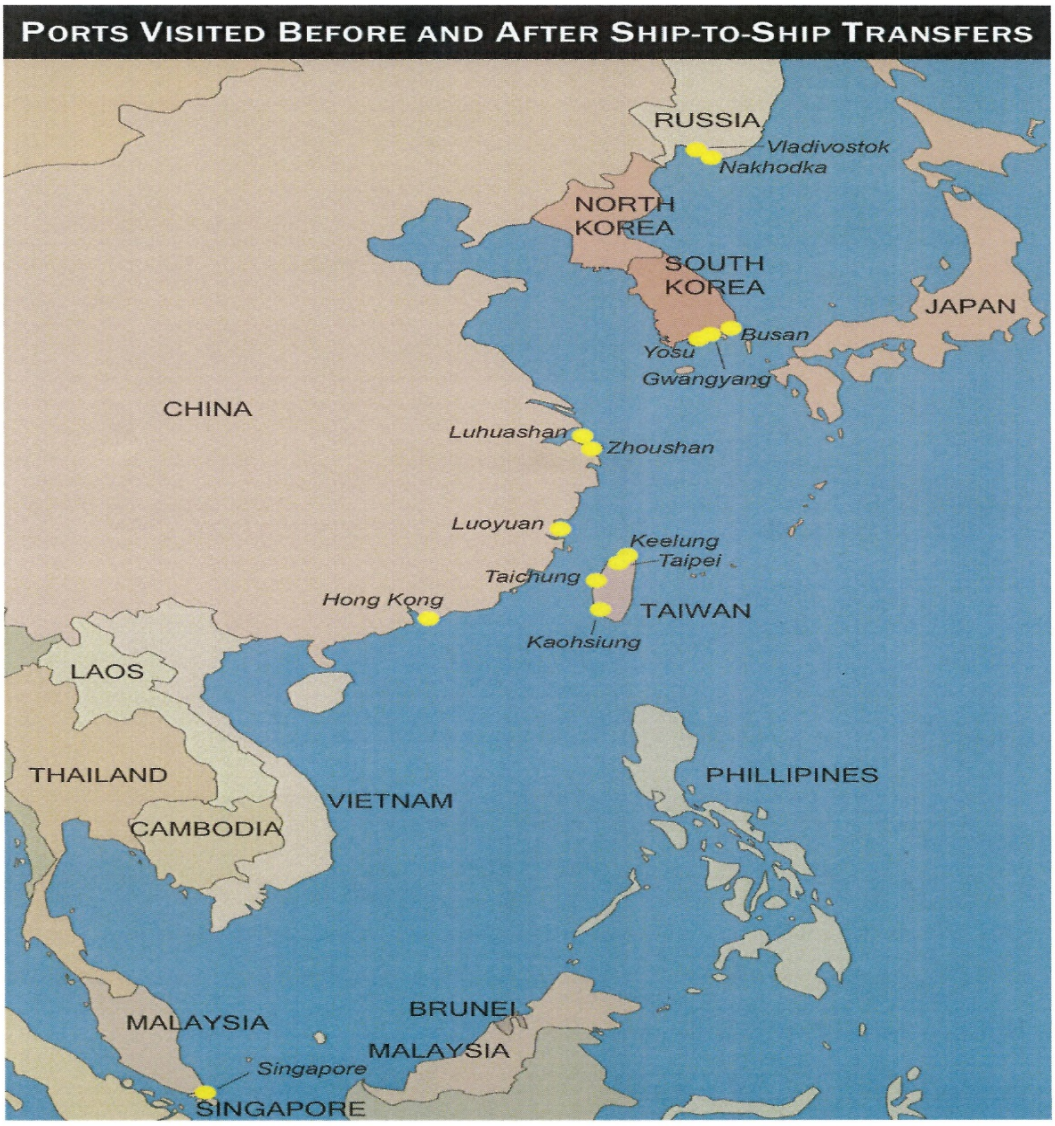


- **Falsifying Cargo and Vessel Documents**: Complete and accurate shipping documentation is critical to ensuring all parties to a transaction understand the parties, goods, and vessels involved in a given shipment. Bills of lading, certificates of origin, invoices, packing lists, proof of insurance, and lists of last ports of call are examples of

documentation that typically accompanies a shipping transaction. North Korea routinely falsifies these documents to obscure the origin or destination of cargo.

- **Manipulating AIS**: North Korea-flagged vessels sometimes manipulate the data transmitted via AIS. Such manipulation could include altering vessel names, IMO numbers, Maritime Mobile Service Identities (MMSIs), [2] or other unique identifying information. This tactic can conceal a vessel's next port of call or other information regarding its voyage.

The following graphic shows ports of call before and after ship-to-ship transfers of refined petroleum:



[2] Vessels use an MMSI, which is a series of nine digits sent in digital form over a radio frequency channel, in order to uniquely identify ship stations, ship earth stations, coast stations, coast earth stations, and participate in group calls.

Risk Mitigation Measures

North Korea's deceptive practices are intended to circumvent existing sanctions compliance controls used by the shipping industry and other actors involved in shipping-related transactions, such as insurance companies and financial institutions. The following measures may mitigate the risks posed by North Korea's deceptive shipping practices:

- **Research a Ship's History to Identify Regular AIS Manipulation**: As part of their due diligence, parties that are involved in the supply chain of ship-to-ship transfers of refined petroleum – oil providers, ship captains, crew, brokers, ship owners, managers, operators, and insurers – should research a vessel's AIS history to help determine whether the vessel may be involved in illicit activities. Parties involved in the import of coal in the Gulf of Tonkin should undertake similar measures.

- **Monitor for AIS Manipulation and Disablement**: Ship registries, insurers, charterers, ship owners, oil providers, and port state control entities should consider investigating vessels that appear to have turned off their AIS while operating in the area surrounding the Korean peninsula, in the East China Sea, or in the Gulf of Tonkin. Any other signs of AIS transponder manipulation should also be considered a red flag and investigated fully prior to entering into contracts with, continuing to provide services to, or engaging in other activities with such vessels (including processing financial transactions in connection with the vessel's activities). Service providers should monitor the AIS transmissions of ships capable of transporting oil that operate in the East China Sea, or coal in the Gulf of Tonkin, and other areas where ship-to-ship transfers occur. Service providers should consider amending contracts to make disabling or manipulating AIS grounds for investigation, which could lead to termination of services or contracts if illicit activity is identified. The United States welcomes the actions of international protection and indemnity (P&I) clubs that have issued circulars on the dangers of North Korean shipping that also explicitly note that insurance will be withdrawn if vessels are engaged in these activities, and encourages all relevant commercial entities to do the same.

- **Promote Continuous AIS Broadcasts**: Port state control authorities in East Asia and Southeast Asia, including the Gulf of Tonkin, should remind oil tankers and ships transporting coal arriving and leaving their jurisdictions of the requirement to maintain AIS broadcasts. Doing so promotes compliance with the International Convention for the Safety of Life at Sea, and port authorities in those locations should remind ships that AIS manipulation and disablement are red flags for illicit activity. Shipping industry associations should circulate this advisory to the companies with which they interact or create their own version and circulate to their members.

- **Petroleum Supply Chain Due Diligence**: Encourage oil companies to mandate that those in the supply chain conduct due diligence to ensure that each recipient and counterparties are not providing oil to a North Korean tanker, and to mandate that they

perform end-use checks for ships that conduct ship-to-ship transfers, particularly in the ship-to-ship transfer area identified in the graphic above.

- **Conduct Research Prior to Ship-to-Ship Transfers**: Vessel operators conducting ship-to-ship transfers in the area highlighted in the graphic on page 3 should be aware of the potential for North Korean vessels to use deceptive practices to hide their identities, including by using false vessel names or IMO numbers. Vessel operators should ensure that they have verified the vessel name, IMO number, and flag prior to engaging in such a transfer, and ensure there is a legitimate business purpose for the ship-to-ship transfer.

- **Review All Applicable Shipping Documentation**: Individuals and entities processing transactions pertaining to shipments potentially involving North Korea-flagged vessels or shipments to or from North Korea should ensure that they request and review complete and accurate shipping documentation. Such shipping documentation should reflect the details of the underlying voyage, including the vessel, cargo, origin, destination, and parties to the transaction. Any indication of manipulated shipping documentation is a red flag for potential illicit activity and should be investigated fully prior to continuing with the transaction. In addition, documents related to ship-to-ship transfers should demonstrate that the underlying goods were delivered to the port listed in the documentation.

- **Clear Communication with International Partners**: Not all parties to a shipping transaction may be subject to the same sanctions regimes, so clear communication is a critical step for international transactions. Clearly communicating U.S. and UN sanctions obligations and the steps required to ensure compliance with them to parties involved in a transaction can ensure more effective compliance with relevant sanctions programs. We encourage all parties involved in the shipping industry to share this advisory with those in your supply chain.

- **Leverage Available Resources**: There are several organizations that provide commercial shipping data, such as ship location, ship registry information, and ship flagging information. This data should be incorporated into due diligence practices, along with available information from OFAC, the UN, and the Coast Guard, as outlined below in the "North Korea Sanctions Resources" section of this advisory.

Penalties for Violations of U.S. and UN Sanctions Regimes

Individuals and entities engaged in shipping-related transactions should be aware of the potential consequences for engaging in prohibited or sanctionable conduct.

OFAC investigates apparent violations of its regulations and exercises enforcement authority as outlined in its Economic Sanctions Enforcement Guidelines. Persons that violate U.S. sanctions with respect to North Korea may face civil monetary penalties and criminal prosecution. Each violation of U.S. sanctions on North Korea is subject to a civil monetary penalty of up to the

greater of $295,141 or twice the value of the underlying transaction.[3] See OFAC's Resource Center for additional information regarding OFAC's enforcement authorities, Economic Sanctions Enforcement Guidelines, recent civil penalties, and other enforcement actions.

DPRK-related UNSCRs also provide various mechanisms for ensuring compliance with UNSCR obligations. The UNSC's 1718 Committee may require a Member State to deregister a ship designated by the UN for sanctions evasion and may also direct that Member States prohibit the vessel from entering their ports. If there are reasonable grounds to suspect that a ship is carrying UN-prohibited cargo, a UN Member State may inspect the ship on the high seas with the consent of the flag state. The flag state may also direct the vessel to proceed to a specific port for inspection. Vessels whose registration cannot be confirmed or that are deregistered by the flag state may be treated as a vessel without nationality and be subject to the laws of the nation conducting the inspection.

North Korea Sanctions Resources

For questions or concerns related to OFAC sanctions regulations and requirements, including to disclose a potential violation of U.S. sanctions regulations, please contact OFAC's Compliance Hotline at 1-800-540-6322 or via OFAC_Feedback@treasury.gov. To submit a request for a specific OFAC license, see https://licensing.ofac.treas.gov/Apply/Introduction.aspx.

IHS Maritime is the manager of the IMO ship numbering scheme. For verification of IMO numbers for individual ships, you can find existing IMO numbers at https://gisis.imo.org/Public/SHIPS/Default.aspx. IHS Maritime can be contacted via email at mailto:ship.imp@ihs.com or at the following address: IHS Maritime, Sentinel House, 163 Brighton Road, Surrey CR5 2YH, United Kingdom.

The U.S. Coast Guard, in coordination with the U.S. Department of State, maintains a list of vessels that will be denied entry to all U.S. ports pursuant to Title III of the Countering America's Adversaries Through Sanctions Act. This list is periodically updated and located here: http://www.nvmc.uscg.gov/CAATSA.aspx . This list is separate from that maintained by OFAC or described in Annex 2. For questions regarding the list, please call or e-mail the U.S. Coast Guard's Headquarters Port State Control Division at portstatecontrol@uscg.mil.

To report potential North Korea-related UN shipping violations, including suspected ship-to-ship transfers with North Korea-flagged vessels in violation of UN requirements, please e-mail: DPRKcargo@state.gov.

[3] Consistent with the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, Sec. 701 of Public Law 114-74 (FCPIA), as amended on March 19, 2018, OFAC adjusted the maximum civil penalty amounts available for violations of the International Economic Emergency Powers Act to $295,141 or twice the value of the underlying transactions, and will adjust those amounts annually.

ANNEX 1

Overview of Sanctions Related to the Maritime Industry

Insurers, flag registries, shipping companies, financial institutions, and others involved in shipping-related transactions may be subject to one or more sanctions prohibitions related to North Korea. A high-level overview of these prohibitions follows, but all individuals and entities reviewing this advisory are encouraged to ensure they understand fully all sanctions obligations that pertain to their activities. Please note this section is current as of the date of this advisory—the most up-to-date information can be found at the websites listed in the footnotes below.

The United States prohibits, among other things:[4]

- Any transactions or dealings involving the property or interests in property of the Government of North Korea or the Workers' Party of Korea;
- Direct or indirect exports and imports to or from North Korea of nearly all goods, services, and technology;
- Vessels that have called at a port in North Korea in the previous 180 days, and vessels that have engaged in a ship-to-ship transfer with such a vessel in the previous 180 days, from calling at a port in the United States; and
- Registering a vessel in North Korea, obtaining authorization for a vessel to fly the North Korea flag, and owning, leasing, operating, and insuring any vessel flagged by North Korea.

The United Nations requires Member States to prohibit, among other things:[5]

- Owning, leasing, operating, chartering, or providing vessel classification, certification or associated service and insurance or re-insurance, to any DPRK-flagged, -owned, -controlled, or -operated vessel;
- Providing insurance or re-insurance services to vessels Member States have reasonable grounds to believe were involved in activities or the transport of items prohibited by the relevant resolutions;
- Providing bunkering or servicing of North Korean vessels suspected of carrying prohibited items;
- Ship-to-ship transfers to or from North Korea-flagged vessels of any goods or items that are supplied, sold, or transferred to or from North Korea; and

[4] These prohibitions apply to transactions by a U.S. person or within the United States, including those that pass through the U.S. financial system. In addition, this document is explanatory only and does not have the force of law. This document does not supplement or modify the statutory authorities, Executive orders (E.O.s), or regulations. For additional details on OFAC prohibitions related to North Korea, see www.treasury.gov/ofac

[5] All UN Member States have a legal obligation to implement the sanctions measures required by UNSCRs. North Korea-related UNSCRs can be found at the 1718 Sanctions Committee website at https://www.un.org/securitycouncil/sanctions/1718.

- Port entry of vessels if designated by the UNSC or if a State has information that provides reasonable grounds to believe that the vessel is owned, controlled, or operated by persons or entities designated by the UNSC.

While the U.S. government imposes a comprehensive prohibition on the importation of goods from North Korea, the UN requires Member States to prohibit the **importation** from North Korea of the following:

- Coal
- Textiles
- Seafood
- Iron and iron ore
- Lead and lead ore
- Copper
- Nickel
- Zinc
- Gold
- Silver
- Titanium ore
- Rare earth metals
- Vanadium ore
- Statues and monuments
- Conventional arms
- Food and agricultural products
- Machinery
- Electrical equipment
- Earth and stone, including magnesia and magnesite
- Wood
- Vessels
- Fishing rights

Similarly, while the U.S. government imposes a comprehensive prohibition on the exportation of goods to North Korea from the United States or by U.S. persons, the UN requires Member States to prohibit the **exportation** to North Korea of the following goods:

- Refined petroleum* (beyond 500,000 barrels/year)
- Crude oil* (beyond 4,000,000 barrels/year)
- Aviation fuel (except fuel required for an aircraft to return to North Korea)
- Rocket fuel
- Condensates and natural gas liquids
- Industrial machinery
- All transportation vehicles (including motor vehicles, trucks, trains, ships, aircraft, helicopters)
- Iron, steel, and other metals
- Conventional arms
- Ballistic missiles
- Weapons of mass destruction & components
- Luxury goods

**Any transfers below the annual cap established by the UNSC (a) must be fully reported to the 1718 Sanctions Committee within 30 days, (b) must not involve any individual or entity associated with the DPRK's nuclear or ballistic missile programs or other UNSC-prohibited activities, and (c) must be exclusively for livelihood purposes of DPRK nationals and unrelated to generating revenue for the DPRK's nuclear or ballistic missile programs or other UNSC-prohibited activities. If any of these three conditions are not met, even transactions below the authorized annual cap are a violation of UNSCR 2397.*

UNSC measures (to be implemented by UN Member States):

Actions on the high seas:

- Inspect vessels with consent of the flag State, on the high seas, if inspecting State has information that provides reasonable grounds to believe that the vessel carries prohibited cargo **(discretionary**);
- Flag state to cooperate with such inspections (**discretionary**); and
- Flag state to direct suspected vessels to proceed to an appropriate and convenient port for the required inspection by local authorities if the flag state refuses to permit inspection on the high seas (**mandatory**).

Actions within the territorial sea or within ports:

- Seize, inspect, and freeze (impound) any vessel in its ports when there are reasonable grounds to believe that a vessel is transporting prohibited items or was involved in prohibited activities involving North Korea (**mandatory**);
- Seize, inspect, and freeze (impound) any vessel subject to its jurisdiction in its territorial waters if there are reasonable grounds to believe that the vessel transported prohibited items or was involved in prohibited activities involving North Korea (**discretionary**); and
- Inspect cargo going to or from North Korea by sea, air, rail, or road (**mandatory**).

Actions on high seas or in territorial waters/ports:

- Seize and dispose of any items the transport of which is prohibited by the UNSCR that is discovered in inspections (**mandatory**).

Registration and other flag State responsibilities:

- Immediately deregister a vessel if the UNSC's 1718 Committee designates a vessel for refusing to comply with flag State direction to permit inspection on the high seas or to proceed to port for inspection (**mandatory**);
- Deregister, and cease to provide classification services for, any vessel that State has reasonable grounds to believe was involved in activities, or transported items, prohibited by UNSCRs and to deregister any vessel that is owned, operated, or controlled by the DPRK as well as deny registration of vessels deregistered by other member states or flag registries for violation of sanctions (**mandatory**);
- Immediately deregister any vessel designated by the 1718 Sanctions Committee (**mandatory**); and
- When deregistering vessels that were involved in UNSCR violations, the registry should note the reason for deregistration as "violation of United Nations Security Council resolutions against the DPRK" on the certificate of deregistration **(discretionary**).

Risks for Masters and Crews

- Vessels may only be flagged under one Flag State at a time and may not change flag during a voyage or while in a port of call except in the case of a real transfer of ownership or change in registration. There must be a genuine link between the Flag State and the vessel for valid registration. A vessel claiming more than one flag according to convenience is not entitled to the protection of any flag and may be treated as a vessel without nationality and subject to the jurisdiction of any state conducting an inspection or

boarding at sea or within a port. Similarly, a vessel that makes a claim of registry which cannot be confirmed may also be treated as without nationality and subject to the laws of the nation conducting the inspection.

- Masters and crews must have full confidence in their owners, managers, and operators that their vessels are properly flagged and maintained. When required registry, safety, pollution prevention, and manning certificates do not match or the required Continuous Synopsis Record is not being properly maintained, these should be warning signs to the master and crew that the vessel's registration could be suspect.
- Masters and crews who knowingly make false claims of registration are responsible for their actions including the potential for prosecution or actions against their credentials.

Risks for Ownership and Management

- Owners and managers of vessels should have proper know your customer documentation for their operators and charterers as the owners and managers are ultimately liable for all actions undertaken by the vessel.
- Owners, operators, and managers are responsible for ensuring their vessels are properly flagged and comply with the Flag State's requirements as well as ensuring the vessel's registry, Continuous Synopsis Record and other required certificates are up-to-date. Vessels improperly or fraudulently flagged may be treated as without nationality and subject to the laws of a country conducting an inspection or boarding.

Activities That Could Result in the Imposition of Sanctions:

OFAC designations under U.S. statutes and Executive Orders:

U.S. law requires the U.S. government to impose sanctions on any person determined to knowingly, directly or indirectly:

- Provide significant amounts of fuel or supplies, provide bunkering services, or facilitate a significant transaction or transactions to operate or maintain a vessel or aircraft that is designated under a North Korea-related E.O. or UNSCR, or that is owned or controlled by a person designated under a North Korea-related E.O. or UNSCR; or
- Insure, register, facilitate the registration of, or maintain insurance or registration for, a vessel owned or controlled by the Government of North Korea.

The U.S. government also aggressively targets for designation any person, among others, that:

- Engages in a significant export to or import from North Korea; or
- Operates in the transportation industry in North Korea.

If the Secretary of the Treasury, in consultation with the Secretary of State, determines that a foreign financial institution has knowingly conducted or facilitated a significant transaction in connection with trade with North Korea, or knowingly conducted or facilitated a significant transaction on behalf of a person blocked under North Korea-related Executive orders, that institution may, among other potential restrictions, lose the ability to maintain a correspondent account in the United States.

UN designations:

The Security Council or the Sanctions Committee Established Pursuant to UNSCR 1718 (the 1718 Committee) may designate for targeted sanctions (asset freeze and, for individuals, travel ban) any individual or entity engaged in or providing support for, including through other illicit means, North Korea's nuclear-related, other weapons of mass destruction-related and ballistic missile-related programs.

In addition, the 1718 Committee may list vessels with a variety of consequences to be imposed by all UN Member States. The 1718 Committee could list a vessel for a global port entry ban for engaging in activities prohibited by North Korea-related UNSCRs or transporting prohibited items from the DPRK, as authorized by paragraph 6 of UNSCR 2371 (2017). The Committee, as authorized by paragraph 12 of UNSCR 2321 (2016), could also list vessels for (a) deflagging, (b) direction to a designated port for inspection and follow-on actions, (c) a global port entry ban, and/or (d) an asset freeze (impoundment).

Finally, when States have information about vessels on the high seas that provides reasonable grounds to believe that the cargos of such vessels contain items the supply, sale, transfer, or export of which are prohibited by relevant UNSCRs, and the vessels are uncooperative, the 1718 Committee may take a variety of actions. If the flag State of the vessel neither consents to inspection on the high seas nor directs the vessel to proceed to an appropriate and convenient port for the required inspection, or if the vessel in question refuses to comply with flag State direction to permit inspection on the high seas or to proceed to such a port, then the 1718 Committee shall consider designating the vessel for an asset freeze and other measures authorized in paragraph 12 of UNSCR 2321 (2016). Further, when the 1718 Sanctions Committee makes the designation, the relevant flag State must immediately deregister that vessel. Any State that does not receive the cooperation of a flag State of a vessel suspected of carrying illicit cargo on the high seas must promptly submit a report to the 1718 Committee containing relevant details regarding the incident, the vessel and the flag State, which the 1718 Committee will publish on its website on a regular basis.

ANNEX 2

North Korean Vessels Capable of Engaging in Ship-to-Ship Transfers of Petroleum

NOTE: This annex is not a sanctions list or a comprehensive list of vessels in which blocked persons may have an interest. While some vessels on this list may be property in which a blocked person has an interest, the inclusion of a vessel in this annex does not constitute a determination by OFAC that the vessel has been identified as property in which a blocked person has an interest. Persons subject to sanctions can be found on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) and other sanctions lists, which can be searched here.

Ship Name	IMO
AN SAN 1	7303803
CHON MA SAN	8660313
CHON MYONG 1	8712362
CHONG RIM 3	8665131
JI SONG 6	8898740
KANG DONG	8977900
KU BONG RYONG	8983404
KUM PIT 1	8613578
KUM UN SAN	8720436
MA DU SAN	8021579
MU BONG 1	8610461
MYONG RYU 1	8532413
NAM SAN 8	8122347
PAEK MA	9066978
PO CHON	8848276
PU RYONG (aka KUM UN SAN 3)	8705539
RYE SONG GANG 1	7389704
SAEBYOL (aka CHONG RIM 2)	8916293
SAM JONG 1	8405311
SAM JONG 2	7408873
SAM MA 2	8106496
SONG WON	8613360
TONG HUNG 5	8151415
UN PHA 2	8966535
WAN HENG 11 (AKA KUM JIN GANG 3)	8791667
YU JONG 2	8604917
YU PHYONG 5	8605026
YU SON (aka Y CHUN)	8691702

ANNEX 3

Guidance for Member States and Industry to Avoid Illicit North Korean Maritime Trade

UN Member States

- Include in National Implementation Reports, as required under relevant UNSCRs, information about how Member States are implementing the port entry ban, deflagging, and asset freeze obligations, as appropriate.

- Encourage shipping industry associations to disseminate this advisory to members, or draft a similar advisory and disseminate that to members.

- Encourage manning agencies to prominently display this advisory in their offices for prospective crew members to review.

Oil Companies and Refineries

- Global commodity traders and companies in the supply chain that provide oil to tankers operating in the East China Sea, should conduct research on the AIS history of vessels that will carry their product to determine if the vessel has a pattern of AIS disablement or manipulation, which could indicate involvement in illicit activities.

- Global commodity traders, and companies in the supply chain that provide oil to tankers operating in the East China Sea, should require knowledge of the ultimate end-user of their products.

- Petroleum product trading, refining and producing companies should include an "AIS switch-off clause" and AIS screening in contracts for at-risk vessels operating in relevant regions.

Maritime Insurance Companies

- Insurance companies should, as part of the due diligence process before extending coverage and at presentment of a claim from a covered vessel, research the AIS history of vessels that transport oil and that operate in the East China Sea to determine if the vessel has a pattern of AIS disablement or manipulation, which could indicate involvement in illicit activities.

- Insurance companies should consider inserting contractual language that states that disabling or manipulating AIS is an indication of potentially prohibited activity and is grounds for investigation, which could lead to revocation of services if illicit activity is discovered.

- Protection and indemnity insurance and reinsurance companies should include a "AIS switch-off clause" and AIS screening in contracts for at-risk vessels operating in relevant regions.

Port State Control Authorities (in Southeast Asia and East Asia)

- As part of the normal port state control communications, remind oil tankers arriving and leaving their jurisdictions of the requirement to maintain AIS broadcasts, in compliance with the International Convention for the Safety of Life at Sea, and remind the ships that AIS manipulation and disablement is a red flag indicator of illicit activity.

Shipping Industry Associations

- Disseminate this advisory to members or create a similar advisory and disseminate to members, to raise awareness of North Korea's deceptive practices and the ways to mitigate the risks of involvement in illicit shipping activities.

Flag Registries

- The use of fraudulent vessel identities undermines the effective implementation of the UN Security Council resolutions and potentially undermines a Flag State's registry if it fails to accurately verify the identity of a vessel seeking to reflag to its registry.

- Flag registries should verify the IMO numbers of vessels when receiving an application for registration. The IMO numbers can be verified through the GISIS Ship and Company Particulars module. If the IMO number and ship name do not clearly match, additional investigation should be conducted prior to registering the vessel. In particular the receiving Flag State should contact the previous Flag State to confirm the application information and its intended release from its registry.

- It is recommended that the receiving Flag State review and confirm the Continuous Synopsis Record with the current Flag State before completing the registration. Relatedly, current Flag States are reminded of their duty, under SOLAS Chapter XI-1 regulation 5.8, to transmit to the receiving Flag State administration a copy of the Continuous Synopsis Record covering the period during which the ship was under their jurisdiction, together with any Continuous Synopsis Records previously issued to the ship by other States.

- Prospective Flag States should also review the U.N. Security Council's Sanctions List Searchable webpage at https://scsanctions.un.org/search/.

- Flag registries should, as part of the due diligence process on new petitions for registration and for ships already on the registry, research the AIS history of vessels that transport oil and that operate in the East China Sea, to determine if the vessel has a pattern of AIS disablement or manipulation, which could indicate involvement in illicit activities.

- Publish the names and IMO numbers of vessels that have been denied registration or deregistered for ties to North Korean illicit shipping activities, so that other flag registries can be made aware.

- Publish and disseminate the names and IMO numbers of vessels that have been deregistered or for which any registry has denied registration, so that other flag registries can be made aware.

- When deregistering vessels that were involved in UNSCR violations, the registry should note the reason for deregistration as “violation of United Nations Security Council resolutions against the DPRK” on the certificate of deregistration**.**

ANNEX 4

Vessels That Are Believed To Have Engaged In Ship-To-Ship Transfers with North Korean Tankers

NOTE: This annex is not a sanctions list or a comprehensive list of vessels in which blocked persons may have an interest. While some vessels on this list may be property in which a blocked person has an interest, the inclusion of a vessel in this annex does not constitute a determination by OFAC that the vessel has been identified as property in which a blocked person has an interest. Persons subject to sanctions can be found on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) and other sanctions lists, which can be searched here.

Ship Name	IMO	Flag State
BINTANG	7706615	Unknown
CHAN FONG	7350260	Togo
JIN HYE aka PEARL 1	8518572	Sierra Leone
KATRIN (formerly: D1325; GOLDEN)	8712790	Panama
KINGSWAY (formerly: BILLIONS NO 18)	9191773	Unknown
KOTI	9417115	Panama / Togo
LUNIS	9200859	Republic of Korea
MIN NING DE YOU 078	Unknown	Unknown
NEW REGENT	8312497	Panama
NYMEX STAR	9078191	Unknown
OU YANG JI XIANG (formerly: HATCH; KOYA)	9396878	Unknown
SEA TANKER II	9664483	Singapore
SHANG YUAN BAO	8126070	Unknown
SUBBLIC (formerly: XIN YUAN 18)	8126082	Togo
TANTAL	8907670	Russia
TIANYOU	8817007	Sierra Leone
VITYAZ	8125703	Russia
YUK TUNG	9030591	Unknown

ANNEX 5

Vessels That Are Believed To Have Exported North Korean Coal Since August 5, 2017

NOTE: This annex is not a sanctions list or a comprehensive list of vessels in which blocked persons may have an interest. While some vessels on this list may be property in which a blocked person has an interest, the inclusion of a vessel in this annex does not constitute a determination by OFAC that the vessel has been identified as property in which a blocked person has an interest. Persons subject to sanctions can be found on OFAC's List of Specially Designated Nationals and Blocked Persons (SDN List) and other sanctions lists, which can be searched here.

Ship Name	IMO	Flag State
ANSHUN	9634359	Unknown
ASIA BRIDGE	8916580	Togo
ASIA HONOR	8405220	Unknown
CHONG BONG	8909575	North Korea
DAE BONG 1	8408193	North Korea
DONG FENG 6	9008201	Unknown
FENG SHUN	9097032	Unknown
FLOURISHING	8421315	Unknown
FOREVER LUCKY	9003653	Unknown
GOO RYONG	8201870	North Korea
HAE SONG 1	8995990	North Korea
HO CHON GANG	8415287	North Korea
HUA FU	9020003	Unknown
HUNG BONG 3	8603286	North Korea
JA RYOK	9826952	North Korea
JANG UN	8822260	North Korea
JI NAM SAN	9114555	North Korea
JI SONG 15	9004671	North Korea
JIA FENG	9136541	Togo
JON SUNG 7	8511251	North Korea
K. MORNING	9021576	North Korea
KA RIM CHON	8314811	North Korea
KAL MA	8503228	North Korea
KO SAN	9110236	North Korea
KUM DAE	9020223	North Korea
KUM SAN BONG	8810384	North Korea

LUCKY STAR	9015278	Togo
MAN CHUNG 1	8406858	North Korea
MYONG SIN	9045182	North Korea
NAM DAE CHON	9138680	North Korea
NORTHERN LUCK	9061227	North Korea
ORIENT SHENYU	8671611	Unknown
ORIENTAL TREASURE	9115028	Unknown
PAEK YANG SAN	9020534	North Korea
PETREL 8	9562233	Unknown
PHO PHYONG	8417962	North Korea
RICH GLORY	8649905	Sierra Leone
RYON HWA 2	8415433	North Korea
RYON HWA 3	8312227	North Korea
SEA STAR 3	8319005	North Korea
SO BAEK SAN	8658267	North Korea
SU SONG	9024889	North Korea
TAE YANG	8306929	North Korea
TALENT ACE	9485617	Unknown
THAE PHYONG SAN	9009085	North Korea
THAE SONG	8748713	North Korea
TONG SAN 2	8937675	North Korea
UN BONG 2	8913186	North Korea
XIN GUANG HAI	9004700	Unknown