



CIRCULAR #0036

Sanctions Compliance and Prohibition on Calls to Restricted Ports

TO	All Haiti-flagged vessels; owners, operators, managers, ISM managers, masters, charterers, agents and Recognized Organizations
DATE	15 March 2026
EFFECTIVE	Immediately
REFERENCE	HISCAR sanctions compliance framework and applicable international sanctions, restrictions, advisories and maritime security measures
CONTACT	tech@hiscr.org

1. Purpose

The Office of the Deputy Commissioner issues this Circular to all Haiti-flagged vessels and to all parties involved in their ownership, operation, management, chartering, certification and representation.

In light of sanctions, restrictions, maritime security risks and measures imposed, maintained or announced by competent authorities, Haiti-flagged vessels are prohibited from calling at any port, terminal, anchorage, offshore facility, loading or discharge area, shipyard or place subject to such measures, unless expressly authorized in writing by the Deputy Commissioner and not otherwise prohibited.

This Circular is issued to protect the Haiti flag, vessel crews, owners and managers, and to prevent exposure to sanctions, interdiction, detention, insurance, banking, commercial and reputational risk.

2. Immediate Prohibition

With immediate effect, no Haiti-flagged vessel shall, directly or indirectly:

- (a) call at, enter, load, discharge, bunker, repair, transship, supply, or conduct any commercial operation at any port, terminal, anchorage, offshore facility, oil or gas terminal, loading or discharge area, shipyard or place of maritime operation that is subject to applicable sanctions or restrictions;
- (b) carry cargo to or from a restricted jurisdiction, or cargo owned, controlled, supplied, financed, insured, sold, purchased or otherwise connected to any sanctioned person, vessel, port, terminal, facility, network or entity;
- (c) conduct ship-to-ship transfer operations involving restricted waters, restricted-origin or restricted-controlled cargo, restricted counterparties, or any sanctioned person, entity, vessel, port, terminal or facility;
- (d) enter into any charterparty, voyage order, fixture, contract or service arrangement requiring or facilitating prohibited activity;
- (e) assist, disguise, conceal or participate in any voyage, cargo movement, AIS manipulation, false documentation, ownership concealment, routing change or other practice intended to evade sanctions, restrictions, interdiction measures, port restrictions or maritime security requirements.

This prohibition applies regardless of whether the relevant instruction is issued by the owner, operator, manager, charterer, sub-charterer, broker, cargo interest, agent or any other third party.

3. Mandatory Compliance with Applicable Measures

All Haiti-flagged vessels and all owners, operators, managers, ISM managers, masters, charterers and agents must comply strictly with all applicable sanctions, restrictions, advisories, designations, maritime security measures,

interdiction measures, port restrictions, general licence conditions, reporting requirements and any other measure imposed, administered, maintained or enforced by competent authorities.

Owners, operators, managers, masters and charterers shall not rely on informal advice, commercial assurances or third-party representations where sanctions, interdiction, port restriction or maritime security risk may exist.

4. Enhanced Screening and Mandatory Notification

All owners, operators, ISM managers and masters of Haiti-flagged vessels must conduct enhanced sanctions and compliance screening before accepting any voyage order, charter instruction, cargo, cargo interest, port call, ship-to-ship transfer, bunkering operation, service arrangement or counterparty connected with a restricted jurisdiction or any high-risk area.

Any Haiti-flagged vessel, owner, operator, manager, master, charterer, broker or agent that receives an instruction or request involving a restricted jurisdiction, restricted cargo, restricted counterparties, related ship-to-ship activity, suspicious AIS activity, or communications from competent authorities concerning sanctions or maritime measures, must notify the Deputy Commissioner immediately at tech@hiscr.org.

No vessel may proceed with any such voyage, cargo, port call, ship-to-ship transfer or related activity unless written authorization is issued by the Deputy Commissioner.

5. Prohibited Deceptive Practices

The following practices are strictly prohibited for Haiti-flagged vessels:

- disabling, manipulating, falsifying or intermittently using AIS in connection with restricted activity;
- changing vessel name, ownership, manager, technical operator, flag, class or documentation to conceal restricted activity;
- using false cargo documents, bills of lading, origin documents, destination documents, port records or charter documentation;
- using shell companies, nominee owners, disguised cargo descriptions, blending, transshipment or payment structures to circumvent sanctions or restrictions;
- dealing with any sanctioned or restricted person, entity, vessel, terminal, port, bank, insurer, trader, cargo interest or intermediary.

6. Emergency, Distress and Force Majeure

This Circular does not prevent a Haiti-flagged vessel from taking action strictly necessary to preserve life, protect the vessel, respond to distress, avoid imminent danger, comply with lawful directions from competent maritime rescue or security authorities, or address a genuine force majeure situation.

Where a vessel enters or approaches restricted waters, a restricted port or a restricted area due to distress, force majeure, casualty, emergency, safety of life, medical evacuation or lawful compulsion, the master and owner must notify the Deputy Commissioner immediately and provide full details, including position, voyage records, AIS records, communications with authorities, cargo details, and the steps taken to avoid commercial operations.

No commercial loading, discharge, transshipment, bunkering, repair, supply or cargo operation may be conducted under the cover of emergency unless expressly authorized by the Deputy Commissioner or required for safety of life or preservation of the vessel.

7. Consequences of Non-Compliance

Compliance with this Circular is mandatory. The Administration applies a strict zero-tolerance approach to sanctions evasion, deceptive shipping practices, unauthorized restricted port calls and any conduct that exposes the Haiti flag to sanctions, detention, interdiction, insurance, banking, commercial or reputational risk.

Any Haiti-flagged vessel found to be in breach of this Circular, or found to have attempted to evade sanctions, restrictions, maritime security measures or interdiction measures, shall be subject to immediate administrative

action, including suspension and deletion from the register of the Haiti International Ship & Corporate Registry without further notice.

Additional action may include cancellation of certificates, withdrawal of permissions or authorizations, notification to Recognized Organizations, insurers, port States, Port State Control authorities, banks and relevant governmental authorities, referral to sanctions or law-enforcement authorities, imposition of penalties, costs and investigation fees, and refusal of future registration applications connected with the same owner, manager, operator, charterer, beneficial owner or related party.

8. Recognized Organizations

All Recognized Organizations authorized by the Haiti International Ship & Corporate Registry must notify the Deputy Commissioner immediately if they become aware that any Haiti-flagged vessel under their class or statutory certification intends to call, has called, or may be connected with restricted activity, sanctioned cargo, sanctioned parties or prohibited maritime operations.

Recognized Organizations shall not issue, endorse, validate or amend certificates in a manner that may facilitate prohibited activity under this Circular.

9. Effective Date and Duration

This Circular enters into force immediately upon issuance and remains in effect until amended, suspended or withdrawn by the Administration.

All owners, operators, managers, masters, charterers, agents and Recognized Organizations must circulate this Circular immediately to all relevant operational, compliance, chartering, legal, crewing, technical and commercial departments. Failure to receive or internally circulate this Circular shall not excuse non-compliance.

For and on behalf of the

Office of the Deputy Commissioner

Haiti International Ship & Corporate Registry