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# How to implement a full maritime services ban on Russian oil

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The EU is considering a full maritime services ban on Russian oil. While the final proposal and decision are still pending, the measure would replace the current oil price-cap regime by prohibiting European and allied companies from providing maritime services for Russian oil exports, regardless of the sale price. The ban would cover transportation, insurance, financing, and other related services. This brief outlines how such a full services ban could be designed and implemented effectively, and how to address potential negative side effects and potential Russian countermeasures.

## Implementation for maximizing impact

In a previous brief, we set out how a full services ban could be designed to maximize impact. It would work as follows: Europe and other allied countries would prohibit any companies under their jurisdiction from providing any services related to Russian oil exports, thereby also excluding any tanker handling Russian oil from the European oil market. European-owned tankers would then have to exit the Russian trade, while European services would be withdrawn from any non-European tanker or actor still handling Russian oil.

The ban would reduce the number of tankers available for Russian exports by removing European-owned vessels. If designed correctly, it would also affect non-European tankers, as some actors would choose to exit the Russian trade to retain access to European services and to the European oil market. Those that remain active in the sanctioned trade would likely charge higher premiums to compensate for increased costs and lost opportunities, as well as due to the reduced tanker supply available to Russia following the exit of European vessels.

For the impact on non-European actors to be significant, the ban must imply strong consequences for those that disregard it and still transport Russian oil. Central to this is the exclusion of such tankers from all European oil trade. To achieve this, a central administrative function should be established to track tankers involved in Russian oil exports. In practice, any tanker calling at Russian oil ports would be added to a sanctions list. European countries would then be prohibited from providing any services

related to these vessels, including allowing them to enter European ports, effectively excluding them from all European oil trade. For this lost access to European services and markets to be consequential, we recommend that the measures have no fixed time limit and remain in place for as long as the sanctions framework applies.

Under such an implementation, Russia may struggle to find enough vessels for its exports, which may therefore fall in the short term. Over time, however, increased premiums will likely attract additional shadow tankers servicing Russian exports. For example, shadow vessels previously serving Venezuela might shift to Russia, along with new entrants. Even so, the elevated costs and risks associated with operating under a full services ban would limit participation to a smaller group of operators who would demand higher premiums, compared to a non-service ban scenario. As a result, even after such adjustments, transport costs for Russian oil would increase, squeezing Russian oil profits. Consequently, a full services ban can still have a substantial negative effect on Russian oil income even if export volumes are not significantly reduced in the long term.

A key objective should be to extend the initial period—during which Russia may not access enough vessels and the ban is most impactful—by preventing new tankers from being sold to Russia or to shadow fleet owners. Efforts to enforce the current EU ban on selling tankers to Russia, or for use in Russia, should therefore be strengthened in parallel with the services ban.

Finally, the share of exports carried by the shadow fleet is significantly smaller for refined products than for crude oil, meaning that a services ban would have a stronger impact on refined products. For maximum effectiveness, the services ban should therefore encompass both crude oil and refined products.

## Potential side effects

Policymakers must also prepare for the likely consequences of a full services ban. As European and allied tankers withdraw, the volume of Russian oil transported by the shadow fleet is likely to increase. At the same time, the overall condition of the shadow fleet could deteriorate further. This would be driven both by the continued ageing of existing vessels and by operators' reluctance to deploy higher-quality tankers in a trade that results in bans from European services and markets.

The primary negative consequences of a larger, older, and potentially more risk-prone shadow fleet operating in European waters are environmental and safety-related. The risks of major oil spills or serious maritime accidents, including incidents involving passenger ferries, could increase. It is therefore essential that the services ban is accompanied by complementary policies aimed at reducing these risks, or at least mitigating their consequences should they materialize.

Such measures could include enhanced maritime surveillance, strengthened oil-spill response and emergency preparedness, and adequate resources and political readiness for vessel boarding and inspection. The interdiction and detention of vessels on safety and environmental grounds—such as safety deficiencies, pollution risks, lack of documentation, or absence of valid insurance—are key tools for keeping the most dangerous shadow-fleet vessels out of European waters. Ships found to have deficiencies can be detained until problems are remedied and prohibited from onward transit if deemed unsafe. These actions also delay voyages, increase operating costs, and reduce shipowners' incentives to participate in this trade.

Under UNCLOS provisions, flagless or falsely flagged vessels do not enjoy flag-state jurisdiction and are not entitled to the normal protections associated with freedom of navigation. This makes them particularly vulnerable to robust enforcement action and thus a key pressure point for restricting shadow-fleet activities.

If such interventions continue or intensify, an additional consequence may be that more shadow tankers seek protection by sailing under the Russian flag. This could increase escalation risks. Policymakers therefore need to carefully consider which actions they are prepared to take under different escalation scenarios.

## Policy recommendations

A full maritime services ban can be an effective tool for reducing Russian oil revenues by increasing transport costs and deepening Russian sales discounts. However, it may come with negative side effects that must be planned for, including increased environmental, safety and escalation risks. We recommend that European policymakers:

- Impose a strict and comprehensive maritime services ban covering both crude oil and refined petroleum products. The ban should apply to all tankers calling at Russian oil ports and for as long as the sanctions framework remains in place. Any such tanker should consequently be prohibited from participating in any European oil trade.
- Establish a central administrative function to identify and list the tankers calling at Russian oil ports. The ban should apply to these vessels regardless of ownership or name changes.
- Strengthen enforcement of the existing EU tanker sale ban in parallel with the services ban, in order to limit the expansion of the shadow fleet.
- Prepare complementary maritime safety and environmental measures, including capabilities and readiness to inspect high-risk vessels, to mitigate the increased risks associated with a larger and ageing shadow fleet.
- Assess and plan for potential escalation scenarios involving Russian flagged vessel.

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