

Russia's 'Shadow Fleet' and Sanctions Evasion: What Is To Be Done?

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Cover

The detained Eagle S tanker off the Finnish coast on 9 January 2025. Finnish authorities seized the vessel in December 2024 on suspicion of being involved in damaging undersea cabling in the Baltic Sea. (Roni Rekomaal/Bloomberg via Getty Images)

Executive Summary

The activities of Russia's 'shadow fleet' have suddenly come under the global spotlight due to a growing focus on efforts to counter its role in evading sanctions and also amid growing suspicions of its involvement in an escalating Russian campaign of hybrid warfare against the West.

Identifying options to clamp down further on shadow-fleet activities was the focus of an IISS workshop held in November 2024 in conjunction with the Royal Navy Strategic Studies Centre, which brought together UK officials, maritime industry representatives and a range of international academics. Those options include whether and how to be more assertive and effective in the enforcement of acknowledged and accepted international requirements under the United Nations Convention on the Law of the Sea (UNCLOS). Additionally, there are potential options exploring ways in which existing legal requirements under UNCLOS could be interpreted more assertively and creatively to address evolving concerns over security, safety and environmental risks at sea. In the latter case, addressing shadow-fleet vessels' inadequate insurance provision has been highlighted as an avenue to pursue. Debates

over the greater use of naval assets and maritime power to pursue these approaches revolve around both the legal frameworks to do so – including the reinterpretation of how to apply the right of 'innocent passage' and the potential risks that could expose in terms of retaliation by other powers, escalation or increased fragmentation of international shipping norms – as well as states' capacity to deploy them.

A watershed moment may be approaching as the risk calculation of Western states shifts in light of growing perceptions of the direct security threat posed by shadow-fleet vessels. But because of the complexity of global shipping, there is no 'silver bullet' solution. To be effective, a new strategy will likely need to be comprehensive and focus on targets beyond individual ships to include the cargoes and their customers, flag states, port states and authorities, and potentially other levers affecting ship operations, such as crewing, or creating additional restrictions based on environmental concerns. However, to gain international adherence and have real effect, such a strategy must be backed up by a coherent rationale and a set of transparent criteria that are consistent with international law.

Introduction

One way or another, what has widely come to be known as Russia's 'shadow fleet' – chiefly ageing oil tankers being used to circumvent international sanctions imposed following Moscow's illegal full-scale invasion of Ukraine in February 2022 – has been dragged sharply into the global spotlight. In part, that is because of an increased focus by a number of Western governments on finding more effective ways to counter the activities of this shadow fleet (sometimes also referred to with some variations in definition as a 'dark fleet' or 'parallel fleet'). It is also partly due to the recent alleged activities by certain vessels suspected of being part of the shadow fleet in what looks like an escalation by Moscow of its hybrid warfare campaign against Western supporters of Kyiv, including intelligence gathering and sabotage efforts against Western critical undersea infrastructure (CUI).

Indeed, this potential link could open the way to a more robust international crackdown on Moscow's shadow-fleet activities. But there may also be other routes to a more rigorous strategy.

Since February 2022, the United States, the United Kingdom, the European Union and their major partners have dramatically increased sanctions across Russia's economic and financial system. This has driven major

innovation in sanctions instruments, notably the oil price cap (OPC) of USD60 per barrel on Russian crude-oil exports (as well as other caps on oil products). In response, Russia has developed increasingly sophisticated forms of sanctions evasion – not least in the maritime arena through the use of the shadow fleet – to circumvent the OPC. Equally, Western-led governments have been seeking ways to enhance their efforts to implement and enforce the sanctions regime, including in the maritime domain, with the US Treasury most recently announcing a further tightening of sanctions, including most dramatically in the numbers of shadow-fleet ships sanctioned.¹

With the Russia–Ukraine war now grinding towards the end of its third year, the stakes involved are greater than ever, as the conflict has become one of attrition and the sustainment of each side's war economies. The UK government has sought to take a lead on the sanctions front as in other areas of strategy and policy on the conflict. So, what this paper seeks to explore is what more can be done by the international community, the UK in particular, and more especially UK defence, to tighten the sanctions squeeze at sea and counter the shadow fleet.

1. Out of the Shadows

The use of shadow fleets is not new. In recent times, other sanctioned nations such as Iran, North Korea and Venezuela have adopted a similar approach, albeit using a variety of tactics to mask their activities. It has been estimated that more than 80% of Russia's shadow fleet of tankers has been purchased on the used market since the spring of 2022 at a cost of some USD10 billion, with as many as 650 vessels believed to have been involved in shadow-fleet activities – although only a relatively small percentage are thought to ply the trade on a regular basis. Recently, close to 70% of Russian seaborne oil and product exports are thought to have been carried in shadow tankers, and 89% of crude-oil exports.²

The general understanding of what constitutes a shadow fleet has evolved over time. In 2023, the International Maritime Organization (IMO) settled on a definition covering vessels engaged in illegal operations to avoid sanctions by seeking to skirt various aspects of maritime regulation and provisions for insurance. A common characteristic of the ships making up shadow fleets is that they tend to be older vessels, with consequent concerns over their reliability and safety.

In Moscow's case, the shadow fleet is increasingly taken to involve vessels whose flag, ownership and operator are not linked to states that are part of the Western-led sanctions coalition. Certain flags of convenience that undertake limited oversight, such as Gabon, figure prominently in the shadow fleet, but it also includes, by some definitions, Russia itself as the flag state. And, while the ownership of most vessels in the global shipping industry is a complex tapestry of different entities, in the case of the shadow fleets of Russia and others the complexity of both the ownership and operator structures is meant deliberately to obscure and confuse. Likewise, the often complex brokerage of the cargoes, occasionally carrying out ship-to-ship transfers of cargoes at sea, and the tactics of changing flags, ship names, ownership and operator, and manipulating or switching off ships' automatic identification systems (AIS) are also used in this way.

In the context of the oil trade, the other key differentiator is the lack of Western oil-spill (protection and indemnity or P&I) insurance as provided by the 'gold standard' of the International Group of P&I Clubs (IG). Given the scale of the potential financial risk, this pooled approach under the IG is seen as the only assured way to deliver the required cover. The adequacy of the shadow-fleet insurance provision is thus widely considered to be in serious doubt, as well as the likelihood that Russian insurers would pay out at all in the current circumstances to any sanctions-coalition states.

This is of added relevance because of concerns about the age and maintenance standards of most of the shadow fleet, with the average age of Moscow's tanker fleet being 18 years. By international standards, this is an elderly fleet, stirring global concerns about the environmental effects of potential oil spills. And, with an estimated 72% of Russian seaborne oil exports emerging from the Baltic and Black seas, now mainly on their way to Asia, some critical waterways are involved, threatening the direct interests of most of Europe's coastal states.³

Since the OPC came into effect, sanctioning nations have been taking various measures to target the shadow fleet and the operators and entities facilitating its activities. These have included incremental steps by the US, the UK, the EU and their key partners to specify or sanction vessels identified as part of the shadow fleet. The UK, as an element of its efforts to take a lead in this area, issued in July 2024 a 'call to action' to states – especially coastal, flag and port states – and the global shipping industry to take steps to ensure compliance with international maritime conventions and regulations.⁴ It has chalked up nearly 50 signatories. Most recently, the UK has launched an initiative under the auspices of the Joint Expeditionary Force (JEF) of chiefly Nordic and Baltic states with the UK as the framework nation. It is essentially a tracking operation, enabled by artificial intelligence (AI), to monitor shadow-fleet activities and potential threats to CUI in key northern waters

including parts of the English Channel, the North Sea, the Kattegat and the Baltic Sea.⁵

A series of recent incidents involving suspected shadow-fleet vessels has further raised international awareness of their activities and some of the security and environmental risks attached to them. Most notably, in December 2024 the Finnish authorities seized a tanker, the *Eagle S*, suspected of having been involved in the apparent sabotage of undersea cabling in the Baltic Sea by dragging its anchor. A few weeks earlier one small elderly Russian tanker sank and another ran aground in bad weather in the Kerch Strait between the Black Sea and the Sea of Azov. The breakdown in the Baltic Sea in January 2025 of another suspected shadow-fleet tanker with nearly 100,000 tonnes of oil on board only further fuelled environmental concerns. These factors together have meant that, in a literal sense, Moscow's fleet has emerged from the shadows.

There is little doubt that various international efforts to target the activities of the shadow fleet and increase

international coordination to disrupt it have complicated matters for Moscow and raised the cost of shadow-fleet operations. Nevertheless, most of the efforts have until recently targeted only a fraction of the fleet. As a result, the impact of the measures, and especially the real strategic effect, remain very much open to debate. For instance, they seem to have done little to reduce the overall volume of Russian oil exports that are circumventing the OPC.

While greater information sharing and new initiatives like the JEF monitoring and tracking mission are valuable, the key is determining what extra teeth can be provided to enforce and implement sanctions in the maritime arena. Equally, understanding and weighing both the potential strategic dividends and risks of a more assertive approach is also critical. In this regard, much of the discussion and many of the options for action appear to revolve around what more can be done to utilise and enforce international maritime law under UNCLOS and the issues and practical challenges arising from that.

2. Western Options All at Sea?

A first step that has been widely mooted involves deciding whether and how to be more assertive and effective in the enforcement of acknowledged and accepted international requirements. One area that has been highlighted is the weak enforcement of the requirement under UNCLOS for there to be a genuine link between a vessel and its flag state. A second step would be exploring ways in which existing legal requirements under UNCLOS could be interpreted more assertively and creatively to address evolving concerns over security, safety and environmental risks at sea. Related to that are various proposals that have been floated for clamping down on vessels' inadequate P&I insurance, as well as for determining what other leverage could be applied to states and entities to deter or dissuade them from facilitating shadow-fleet operations or even incentivise them not to do so.

An initiative to increase adherence to the UNCLOS requirement for a genuine link between a vessel and its flag state could be accompanied by an increased focus on ensuring that targeted flag states fulfil their responsibilities to ensure vessels under their flag adhere to accepted international regulatory norms. This would be backed up by enhanced and concerted pressure, diplomatic and economic, to include the threat of sanction and designation, by as wide a coalition as possible.

The Kyiv School of Economics Institute (KSE) has attracted much attention for its analysis of Russian shadow-fleet development and activities and for its advocacy of measures to toughen up sanctions against the fleet. It places particular emphasis on the requirement to disclose the details of vessels' oil-spill insurance, given that one of the starkest discriminators is between the opaqueness of shadow-fleet cover and the transparency – backed by the IMO – of the IG's cover for most mainstream global shipping.

The UK has begun increased interrogation of ships on passage through its waters about their oil-spill insurance, and other European states have also since followed suit. Responses are voluntary, although the

implication is that inadequate responses increase the risk of designation or sanctioning of suspect ships. KSE, however, is calling for a mandatory requirement, backed by pressure and the threat of imposing financial liability against flag states and other parties involved, including owners and operators. Others have also proposed initiatives targeting the oil-spill insurance issue, including focusing on specific sensitive and vulnerable waterways such as the Baltic Sea.⁶

In the event that such levers do not deliver real change, consideration should be given to what enforcement measures could be applied at sea, and specifically the potential interdiction of suspect shipping. The possible application of naval assets and maritime power to this end presents a number of challenges in terms of capacity and legality, as well as the political will to go down this route.

If diplomatic and economic levers are not enough to do the trick, navies and even coastguards and other maritime security agencies, which are spread thinly enough as it is, would be hard-pressed to implement and enforce a shadow-fleet crackdown. A more robust approach would likely need to be accompanied by a decision to raise the priority of such a mission in terms of tasking existing limited resources, and also potentially increasing investment in additional resources, particularly those that could be acquired quickly.

In this case, the Royal Navy's reduced numbers of ships mean it is under pressure to deliver on its current commitments, let alone additional ones. In this respect, it has recently ended its support to the UK's civilian authorities to provide fishery protection. Surveillance and patrolling alone require significant resources. Having assets available to respond quickly to boarding and inspection demands would be a further drain on resources.

Other nations face similar commitment and resource issues. A possible answer to this is agreeing to cooperate and share the burden in key waterways like the Danish straits or the English Channel. That would likely require

not only aligning priorities between states, but also domestic legislation to support the commitment, and agreement that the international regulatory framework

permits intervention. In this area, there remains disagreement over the permissiveness of international law and the balance of risk in applying it.

3. Not-so-innocent Passage?

In this respect, notably, UNCLOS grants coastal states rights to protect their waters and exclusive economic zones from vessels in relation to security threats, violations of international law and pollution risks. But that needs to be weighed against the UNCLOS provisions of the right of innocent passage in territorial waters, and unimpeded straits transit in the case of confined waters and choke-points like the English Channel. Moreover, the wording of UNCLOS underscores that these provisions should not be applied against a particular state in a discriminatory way.

Moreover, the burden of proof to justify the boarding or seizure of shipping vessels is heavy, particularly to legitimise any pre-emptive action. The convention stipulates the need for ‘clear grounds’ to suspect a threat to security or international law, and evidence of a ‘significant discharge’ to justify concerns about a pollution risk. Likewise, freedom of navigation is a key pillar of the rules-based international system that Western and like-minded states profess to defend.

Advocates of the more permissive approach suggest that there is room for manoeuvre over what constitutes the threshold for action. However, the argument that the Western-led coalition should adopt a more assertive, permissive and liberal approach to taking action at sea against the shadow fleet under the aegis of UNCLOS and its stated exceptions to the right to innocent passage raises the concern that it would encourage revisionist states – such as China via its maritime claims in the South China Sea, Iran over ship seizures in the Strait of Hormuz and Russia in the way it applies UNCLOS in the Arctic – to abuse the system (as most Western states and their allies and partners would certainly see it) more than they already have. Again, proponents of this approach argue that this should not deter action as the revisionist states’ behaviour essentially amounts to breaches of UNCLOS already.

Nevertheless, such a shift would make it more difficult to challenge revisionist states on this issue and leave the West more vulnerable to charges it already faces of inconsistency in the application of global principles. This could complicate the challenge of winning support from

the critical constituency of sceptical, hedging or opportunistic states, whose support and engagement will be key to deterring and choking off shadow-fleet operations. There are critical risk calculations associated with this approach. For the UK, whether it undermines its standing as a maritime-services provider; and internationally, whether it will shore up the mainstream maritime industry or provoke further fragmentation of global shipping.

Such an approach could carry the risk of potential retaliatory and escalatory side effects. A noted case study is the seizure in 2019 by UK authorities in Gibraltar waters of the tanker *Grace 1*, which was suspected of transporting Iranian oil to Syria in breach of sanctions. Part of the fallout from that move was Iran’s seizure of the UK-flagged vessel *Stena Impero*.

Nevertheless, it has been suggested that redefining the Western approach to innocent passage could see operations in breach of sanctions being cited as a direct threat to the security of European coastal states as a pretext to carry out interdictions and boardings. This would likely be problematic in the absence of, for example, a United Nations Security Council resolution as cover. Likewise, moves under the pretext of suspected breaches of international law and maritime regulation and over the question of pollution risk carry a high bar of proof, both in terms of the international legal requirements but also the judgement of the court of international opinion.

All this would place a premium on presenting the evidence to justify any action under a clearly transparent, rigorous, comprehensive and as widely endorsed a process and framework as possible. That would also apply to any initiative to dramatically broaden the designation and sanctioning of shadow-fleet vessels. Indeed, establishing an internationally acceptable ‘due process’ for action against or sanctioning of vessels would likely be a vital element of any such approach.

Questions remain, firstly over whether a sufficient quorum of countries demonstrate the political will to adopt this approach, and secondly whether there is the capacity to actually deliver on it.

4. A Watershed Moment?

Two factors may be leading to a watershed moment. One is that we may be reaching an inflection in the Russia–Ukraine war itself. Coupled with this is a growing perception that the Russian war economy is in a fragile state and under growing strain.

The second is the observation of something of a sea-change in perceptions, particularly among European NATO members, of the extent to which Russia represents a direct security threat, now and into the future. This is leading to a potential recalculation among Western-led coalition states of the fine balance between the potential impact and the risk of interpreting and enforcing sanctions against the Russian shadow fleet more robustly. Part of that is due to the concern about an escalation of Russia’s suspected hybrid-warfare campaign against the West, and the potential role of shadow-fleet ships as multi-role tools in that campaign.

In this context, the seizure by Finnish authorities of the *Eagle S* may be highly significant. It is suspected of involvement in the deliberate sabotage of the Estlink-2 undersea cable by dragging its anchor. If that is the case, what may have been an effort by Moscow to deter and cow Western supporters of Ukraine may backfire. Added to this is a growing suspicion, based on surveys and investigations, that at least some of the shadow-fleet vessels may be fitted out with clandestine electronic intelligence-gathering and surveillance equipment.⁷

Under longstanding UNCLOS interpretations, the behaviour of the *Eagle S* may have been sufficient by itself to trigger Finnish action on suspicion that it was not engaged in innocent passage. However, the Baltic

Sea may be a special case, both because of its role as a route for Russian shipping but also its susceptibility to the kind of hybrid warfare in question. Whether that, and growing concerns that the shadow fleet is being used for espionage, are sufficient grounds to prompt wider action by other coastal states may be open to question. However, even if it does not prompt acting against the shadow fleet’s tankers, it may strengthen the inclination to shift the calculus on whether to act against vessels in the fleet suspected of transporting sanctions-busting weapons and military equipment to Russia.

The other window of opportunity may be to focus on the environmental threat, to capitalise on the growing zeitgeist to take action. Indeed, if presented as a ‘vanguard’ initiative to take action on what is perceived as an increasingly urgent transnational issue, UNCLOS may prove to be a potent tool.

In this area there is also a precedent of unilateral action by coastal states having real impact. In the much-cited case of the 26-year-old single-hull tanker *Prestige*, which sank in a storm off the Spanish coast in November 2002, causing a devastating oil spill, the authorities of Spain and subsequently France and Portugal banned single-hull tankers carrying heavy crude from their waters. This accelerated the phasing out of single-hull tankers internationally and drove new international standards.

However, to have real impact and a chance of attracting global adherence, and to support the argument that pursuing the environmental route is being done in good faith, this would likely have to be an approach that is applied without discrimination.

5. Towards a New Strategy

Certainly, actions against the shadow fleet have been ratcheting up. However, the criticism has been that the incremental and overly cautious approach – in part fuelled by fears that a more robust stance would have a damaging effect on the global oil market – has undercut the effectiveness of the measures taken and allowed Russia the luxury of being able to adapt and respond.

This suggests that any new approach needs to be set within a more comprehensive and coherent strategy. This would need to take into account the fact that, precisely because of the complexities of the global shipping market, there is no ‘silver bullet’. The way forward may involve the joining up of the range of existing and currently planned measures of monitoring and sanctioning with new approaches in a coherent way, with the aim of gaining the widest adoption.

Clearly, enhanced monitoring, surveillance and information-gathering of the type being instituted by the UK under the JEF, particularly if it is enhanced with AI-supported data processing, will be a critical element. So too would be the further extension of the sanctioning and designation process for shadow-fleet ships, but this must be strengthened by transparent and agreed sets of standards.

Much focus has been on the ships themselves, and ship operators. However, a more effective strategy may focus on targeting the flag states involved to persuade them into compliance or at least to apply their regulatory responsibilities more rigorously. In this respect, the measures taken by the US Treasury and its Office of Foreign Assets Control are often highlighted as being particularly effective. This is in large part down to US economic leverage, not only thanks to its currency being the denominator of the international oil trade, but also its economic links with flag states, consumers and shipping operators. And while it may not be applying secondary sanctions specifically, the United States’ demonstrated willingness to do so in the past appears to be another persuasive factor. This may add to the pressure on European states to show

more consistent willingness to apply secondary sanctions as a tool.

US engagement in this enterprise will remain critical, notwithstanding the uncertainty over what stance the new Trump administration will take. In this respect, framing any approach in the context of potential advantage to the United States’ own energy sector as well as for use as a bargaining chip in any negotiation on the future of the Russia–Ukraine conflict will likely aid the chances of gaining traction and adherence in a Trump-led Washington.

Another avenue that has been advocated is to focus on the cargoes and particularly to engage with the key shadow-fleet customers, such as India, by emphasising the environmental and reputational risks to them of any major pollution disaster. Likewise, focusing on the port authorities, seeking to engage those ports at which shadow-fleet tankers might call or owners and managers might reside – and potentially even sanctioning ports themselves – would be another way of toughening up the sanctioning process and narrowing Moscow’s options.

Leveraging potential crew concerns and threatening to sanction crewing agencies that serve the shadow fleet could also be a significant way to exert additional pressure. Given international concerns about a global shortage of seafarers, this could be especially effective.

The environmental zeitgeist offers a further source of pressure in terms of the more rigorous application of regulations on ship emissions and performance standards for ship propulsion. Additional regulations to restrict the speed of non-compliant or suspect vessels could be an added penalty for operators.

In the end, the issue will likely remain whether governments have both the willingness and capacity to reinterpret and enforce the rules, including to detain and impound ships. However, a shift from an incremental to a coordinated and comprehensive strategic approach, which also involves the potential application of a range of levers, may achieve greater overall effect and reduce Russia’s room to manoeuvre and evade.

Conclusions

Underlying all of this is the issue of whether threat perceptions have changed sufficiently among the governments of the current sanctions coalition to alter their risk calculus on applying more robust measures and implementing them more assertively. Given the complexities of the global shipping industry itself, the provision of international maritime law, and

the relationships between some of the key parties, a comprehensive and coordinated package of additional measures targeting multiple provisions and stakeholders seems most likely to have real effect. This must be backed up by a coherent rationale and a set of transparent criteria that are consistent with international law.

Notes

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