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GOVERNMENT OF PAKISTAN
MINISTRY OF MARITIME AFFAIRS
DIRECTORATE GENERAL PORTS & SHIPPING
****

Karachi, 18th August 2026

Circular No. 002/2026

Notice to:

1. All Port Authorities.
2. Gadani Ship Breaking Yards.
3. All Pakistani Shipowners /Operators.
4. All Pakistani Flag Companies.
5. Pakistan Single Window (PSW) Operators.
6. All Shipping and Port Agents.
7. All Recognized Organizations (ROs).
8. All other concerned maritime stakeholders.

Subject: **ENHANCED DUE DILIGENCE, VESSEL IDENTITY AND FLAG VERIFICATION, SANCTIONS COMPLIANCE, AND PREVENTION OF PORTS OF CALL BY VESSELS OPERATING UNDER FRAUDULENT IDENTITIES OR SUBJECT TO INTERNATIONAL SANCTIONS**

1. PREAMBLE AND LEGAL BASIS

1.1 The Directorate General Ports & Shipping (DGPS), being the Competent Maritime Administration and Flag State Administration of the Islamic Republic of Pakistan, issues this Circular in exercise of its statutory powers and regulatory responsibilities under the **Merchant Shipping Ordinance, 2001**, the Rules and Regulations framed thereunder, and other applicable laws governing maritime safety, security, navigation, vessel registration, certification and maritime administration.

1.2 Reference is made to the correspondence exchanged between the Principal Officer, Mercantile Marine Department (POMMD), Ministry of Foreign Affairs (SECDIV), and Directorate General Ports & Shipping regarding vessels operating under questionable, fraudulent, unauthorized or fictitious flag registrations, including vessels purporting to be registered under the **Botswana Flag Administration** and other non-recognized or fictitious flags. The concerns raised through the said correspondence necessitate strengthened and uniform verification procedures at all Pakistani ports and maritime facilities.

1.3 DGPS has observed that deceptive shipping practices are increasingly used internationally to conceal vessel identity, ownership, cargo origin, trading history or destination and to circumvent international sanctions and maritime regulatory requirements. Such practices include, but not limited to:

a. Fraudulent, forged or unauthorized Certificates of Registry;
b. Unauthorized use of national flags or operation under false/fictitious flags;

c. False, altered or inconsistent IMO particulars and Call Signs;
d. Falsification or manipulation of statutory certificates;
e. Frequent unexplained changes of flag, ownership, management or vessel identity;
f. Manipulation, disabling or falsification of Automatic Identification System (AIS) transmissions;
g. Suspicious or unlawful Ship-to-Ship (STS) transfers intended to conceal cargo origin, ownership or destination;
h. Concealment or falsification of previous ports of call;
i. Concealment of beneficial ownership or controlling interests; and
j. Other deceptive shipping practices intended to evade applicable laws, sanctions or regulatory controls.

1.4 Such practices constitute a significant risk to Pakistan's maritime security, port operations, international trade, financial system, insurance arrangements and international reputation and may adversely affect Pakistan's compliance with applicable United Nations Security Council Resolutions (UNSCRs), international maritime obligations and Government of Pakistan policy.

1.5 This Circular shall be implemented in conjunction with applicable directions issued by the Ministry of Maritime Affairs, Ministry of Foreign Affairs, and other competent authorities of the Government of Pakistan.

2. PURPOSE AND OBJECTIVES

2.1 The purpose of this Circular is to establish a uniform, robust and legally sound framework for enhanced due diligence, vessel identity verification, flag verification and sanctions-risk screening of vessels intending to call at or utilize facilities in Pakistan.

2.2 The objectives of this Circular are to:

a. Protect Pakistani ports and maritime facilities from misuse by sanctioned, fraudulent or deceptively operated vessels;
b. Prevent the use of Pakistani ports for sanctions evasion, unlawful maritime activities or fraudulent shipping operations;
c. Ensure compliance with applicable United Nations Security Council Resolutions and Government of Pakistan directives;
d. Prevent the processing of false, forged or misleading vessel documentation through Pakistan Single Window (PSW);
e. Protect Pakistani ports, shipping companies, insurers, financial institutions and other stakeholders from avoidable legal, financial, commercial and reputational exposure;
f. Identify vessels operating under fraudulent, fictitious or unauthorized flags;
g. Establish a uniform enhanced due diligence mechanism among KPT, PQA, GPA, Gadani Ship Recycling Yard, PSW, Shipping Agents and other concerned stakeholders; and
h. Minimize the risk of Pakistan's maritime sector being exposed to secondary sanctions or other international financial and commercial restrictions.

3. ENHANCED VESSEL SCREENING AND VERIFICATION

3.1 With immediate effect, every vessel intending to call at any Pakistani port or utilize any Pakistani maritime facility shall be subjected to appropriate vessel identity and documentary verification. The level of verification shall be proportionate to the vessel's risk profile.

3.2 Enhanced due diligence shall, where applicable, include verification of the following:

a. **Registration and Identity:** Flag Registry, Certificate of Registry, IMO Number and Call Sign;
b. **Ownership and Management:** Registered Owner, Beneficial Owner/Ultimate Beneficial Owner (UBO), Technical Manager and ISM Company;
c. **Classification and Certification:** Classification Society and statutory certificates, including applicable Safety Management, Load Line, MARPOL and other statutory certificates;
d. **Operational History:** Last Ten Port Calls, AIS Voyage History and trading pattern;
e. **Commercial and Cargo Information:** Cargo documentation, Bills of Lading and Charter Party details;
f. **Insurance:** Protection and Indemnity (P&I) Club and relevant insurance information;
g. **Ship-to-Ship Operations:** Recent STS transfer history and circumstances;
h. **Flag History:** Recent changes of flag and reasons for such changes; and
i. **Other Information:** Any other information reasonably required by DGPS, MMD, Port Authorities or competent Government agencies for determining the vessel's identity, ownership, legality or sanctions risk.

4. IDENTIFICATION OF HIGH-RISK VESSELS

4.1 Enhanced scrutiny shall be mandatorily applied where there are reasonable grounds to believe that a vessel exhibits one or more of the following high-risk indicators:

a. Operation under fake, forged, fraudulent, unauthorized or fictitious flag documentation;
b. Display of a national flag without valid authority from the relevant Flag Administration;
c. Forged, invalid, expired or materially inconsistent Certificates of Registry or statutory certificates;
d. Inconsistent, ambiguous or deliberately altered IMO particulars;
e. Recent unexplained changes of flag, ownership, management or vessel identity;
f. Intentionally disabling, manipulating or falsifying AIS information;
g. Suspicious STS transfers conducted in atypical locations or under questionable circumstances;
h. Concealment or falsification of previous port calls;
i. Concealment or falsification of cargo origin or destination;
j. Concealment of ownership or beneficial ownership;
k. Significant discrepancies between vessel documents, AIS information, classification records and Flag State records; or
l. Any other credible indication of deceptive shipping practices or sanctions-evasion activity.

5. SANCTIONS COMPLIANCE

5.1 All Port Authorities, Port Operators, Pakistan Single Window (PSW), Shipping Agents, Ship Recycling Facilities, Customs Authorities and other concerned maritime stakeholders shall ensure compliance with:

a. Applicable United Nations Security Council Resolutions and UN sanctions;
b. Applicable laws of Pakistan;
c. Directives and instructions issued by the Government of Pakistan;
d. Directions of the Ministry of Maritime Affairs and Ministry of Foreign Affairs;

e. Instructions issued by DGPS and the Mercantile Marine Department;
f. Relevant IMO instruments, circulars and guidance concerning maritime security, fraudulent vessel identities and deceptive shipping practices; and
g. Enhanced sanctions-risk screening in respect of vessels, owners, operators, managers, beneficial owners and associated entities designated under relevant international sanctions programmes.

5.2 Particular attention shall be given where there are reasonable grounds to believe that:

a. The vessel, owner, operator, manager or beneficial owner appears on an applicable United Nations Security Council Sanctions List;
b. The vessel or an associated entity is designated under the United States Department of the Treasury, Office of Foreign Assets Control **(OFAC)** sanctions programmes;
c. The vessel or associated entity is subject to another international or unilateral sanctions measure which may create legal, financial, insurance or commercial implications for Pakistani stakeholders;
d. The vessel is operating under fraudulent registration or a false/fictitious flag;
e. The vessel is using forged or invalid certificates; or
f. The vessel is engaged in deceptive shipping practices or sanctions-evasion activities.

5.3 The inclusion of OFAC screening in this Circular is intended to ensure effective sanctions-risk management and enhanced due diligence. It does not imply that OFAC sanctions are automatically enforceable as Pakistani law. However, dealings with OFAC-designated vessels or entities may expose Pakistani ports, shipping companies, financial institutions, insurers and other stakeholders to secondary sanctions, financial restrictions, loss of insurance cover, commercial liabilities and reputational consequences.

6. VESSELS TRADING WITH HIGH-RISK JURISDICTIONS

6.1 A vessel whose recent trading history includes calls at ports located in jurisdictions subject to comprehensive United Nations sanctions, or which has been identified through credible intelligence, international advisories or competent Government sources as presenting an elevated sanctions-evasion risk, shall not be automatically denied entry solely on that basis.

6.2 Such vessels shall instead be subjected to enhanced documentary verification, sanctions screening and comprehensive risk assessment by the Mercantile Marine Department/DGPS in coordination with the relevant competent authorities.

6.3 The assessment shall, where appropriate, include examination of:

a. Cargo origin and destination;
b. Ownership and beneficial ownership;
c. Vessel flag and registration;
d. Previous ports of call;
e. AIS history;
f. STS transfer history;
g. Bills of Lading and cargo documents;
h. Classification and statutory certificates; and
i. Any available information concerning sanctions-evasion or deceptive shipping practices.

6.4 Where credible evidence indicates sanctions evasion, fraudulent documentation, deceptive shipping practices, false flag operations, forged statutory certificates, concealment of ownership or beneficial ownership, or violation of applicable Pakistani law, Government directives or binding United Nations Security Council Resolutions, DGPS shall coordinate with the competent authorities to determine whether port entry, berthing, cargo operations, ship recycling, bunkering, STS operations or other port services should be withheld, restricted or refused in accordance with applicable law.

6.5 The mere fact that a vessel has previously called at a port located in a particular country or jurisdiction shall not, by itself, constitute conclusive evidence of sanctions violation. Each case shall be assessed on its facts, available evidence, applicable law and Government policy.

7. OFAC-DESIGNATED VESSELS AND ENTITIES

7.1 Where screening identifies that a vessel, its registered owner, beneficial owner, operator, manager or other relevant associated entity is designated under an applicable OFAC sanctions program, the matter shall immediately be referred to DGPS through the concerned Mercantile Marine Department.

7.2 The concerned Port Authority, Shipping Agent, PSW user or other stakeholder shall provide DGPS with all available information concerning the vessel and the proposed port call.

7.3 Pending review and appropriate guidance from DGPS and, where necessary, consultation with the Ministry of Maritime Affairs, Ministry of Foreign Affairs and other competent Government authorities, no routine recommendation for port entry or processing through PSW shall be made where such action would create a material sanctions, legal or commercial risk.

7.4 Any decision to restrict, withhold or refuse port access or services shall be taken in accordance with Pakistani law, applicable UN Security Council Resolutions, Government directions and the statutory authority of the competent Government agency.

8. FRAUDULENT, FICTITIOUS OR UNAUTHORIZED FLAGS

8.1 No vessel shall be treated as validly registered under a national flag merely because it displays that flag or produces a purported Certificate of Registry.

8.2 Where the authenticity of a flag registration is doubtful, the relevant Port Authority, Shipping Agent or other stakeholder shall obtain verification from the purported Flag Administration through appropriate official channels.

8.3 Particular attention shall be given to vessels purporting to operate under flags for which the authenticity of registration, authorization or statutory certification cannot be independently verified.

8.4 Any suspected fraudulent or fictitious flag, including purported registration under a non-recognized or unauthorized flag, shall immediately be reported to DGPS/MMD for verification and further instructions.

8.5 No Shipping Agent shall knowingly facilitate the port call, documentation or PSW processing of a vessel using fraudulent or forged flag documents.

9. REPORTING AND PROCESSING OF SUSPICIOUS VESSELS

9.1 Where any vessel is identified as meeting the criteria specified in Sections 4, 5, 6, 7 or 8, or is otherwise suspected of being involved in prohibited or unlawful activity, the matter shall immediately be reported to DGPS through the concerned Mercantile Marine Department.

9.2 The report shall contain, as far as available:

a. Vessel Name;
b. IMO Number;
c. Call Sign;
d. Flag;
e. Certificate of Registry details;
f. Registered Owner;
g. Beneficial Owner;
h. Manager/ISM Company;
i. Classification Society;
j. Last Ten Ports of Call;
k. AIS History;
l. Copies of relevant certificates;
m. Cargo details and Bills of Lading, where applicable;
n. STS history, where relevant; and
o. Detailed grounds for suspicion.

9.3 Pending review by DGPS and consultation, where appropriate, with the Ministry of Maritime Affairs, Ministry of Foreign Affairs, Pakistan Customs, Port Authorities and other competent Government agencies, no routine processing through PSW or recommendation for port entry, berthing, cargo operations, ship recycling or other port services shall be undertaken where such action is contrary to applicable law or Government directions.

9.4 Nothing in this Circular shall prevent any necessary action required to safeguard the **Safety of life at sea,** the marine environment, port security or compliance with mandatory obligations under Pakistani law.

10. RESPONSIBILITIES OF SHIPPING AGENTS AND PORT AGENTS

10.1 All Shipping Agents and Port Agents shall conduct rigorous due diligence before accepting a vessel's nomination for any Pakistani port or maritime facility.

10.2 They shall, to the fullest extent reasonably practicable:

a. Verify flag authenticity;
b. Verify IMO particulars;
c. Verify Certificates of Registry and statutory certificates;
d. Verify ownership and management information;
e. Conduct appropriate UN and OFAC sanctions screening;
f. Review the vessel's recent port and trading history;
g. Review available AIS information;
h. Report suspicious vessels immediately to DGPS/MMD; and
i. Ensure that no false, forged, incomplete or misleading information is submitted through PSW.

10.3 No Shipping Agent or Port Agent shall knowingly facilitate or conceal the identity, ownership, flag status or sanctions exposure of a vessel engaged in fraudulent or deceptive shipping practices.

11. RESPONSIBILITIES OF PAKISTAN SINGLE WINDOW (PSW)

11.1 PSW operators and all submitting entities shall ensure the accuracy and completeness of vessel particulars submitted through the system.

11.2 Particular attention shall be given to:

a. Vessel Name;
b. IMO Number;
c. Call Sign;
d. Flag;
e. Owner;
f. Agent;
g. Port of departure;
h. Last ports of call; and
i. Other information required by the relevant competent authorities.

11.3 Where false, fraudulent or materially inconsistent information is identified or suspected, the matter shall immediately be notified to DGPS/MMD and the relevant competent authority.

12. RESPONSIBILITIES OF PORT AUTHORITIES AND SHIP RECYCLING FACILITIES

12.1 KPT, PQA, GPA and other Pakistani port authorities shall establish appropriate internal procedures to ensure that suspicious vessels identified under this Circular are referred to DGPS/MMD for assessment.

12.2 Gadani Ship Recycling Yard and all ship recycling stakeholders shall apply the same enhanced due diligence to vessels proposed for recycling, including verification of:

a. Flag;
b. IMO Number;
c. Ownership;
d. Last ports of call;
e. Relevant sanctions status;
f. Certificates and registry documents; and
g. Cargo and hazardous-material information, where applicable.

12.3 No ship recycling facility shall knowingly process a vessel using fraudulent registration, false identity or forged statutory documentation.

13. INTER-AGENCY COORDINATION

13.1 DGPS shall coordinate, where appropriate, with:

a. Ministry of Maritime Affairs;
b. Ministry of Foreign Affairs;

c. Mercantile Marine Department;
d. Pakistan Customs;
e. Pakistan Single Window;
f. Karachi Port Trust;
g. Port Qasim Authority;
h. Gwadar Port Authority;
i. Maritime Security Agencies;
j. Relevant Flag Administrations;
k. Relevant Classification Societies;
l. Other competent Government agencies; and
m. Relevant international maritime authorities and IMO Member States, where appropriate.

13.2 Such coordination shall be undertaken to ensure a harmonized approach to vessel identity verification, sanctions-risk assessment, maritime security and prevention of deceptive shipping practices.

14. LEGAL NOTE AND CONSEQUENCES OF NON-COMPLIANCE

14.1 This Circular shall be implemented in accordance with the Merchant Shipping Ordinance, 2001(as amended), applicable Rules and Regulations, applicable laws of Pakistan, relevant United Nations Security Council Resolutions, directives issued by the Government of Pakistan and Pakistan's applicable international obligations.

14.2 References to United States Department of the Treasury, Office of Foreign Assets Control (OFAC) sanctions are made for sanctions-risk assessment and enhanced due diligence. While OFAC sanctions are not, by themselves, automatically enforceable under Pakistani law, dealings with OFAC-designated vessels or entities may expose Pakistani stakeholders to secondary sanctions, restrictions on international financial transactions, loss of insurance cover, commercial liabilities and reputational harm.

14.3 Such exposure may also adversely affect Pakistan's maritime trading interests, insurance arrangements, access to international financial and shipping services and the international risk perception of Pakistani ports and shipping interests, including the possibility of adverse consideration by international maritime and war-risk insurance bodies.

14.4 All stakeholders are hereby placed on notice that failure to exercise reasonable due diligence, deliberate concealment of vessel identity, processing of fraudulent documentation or knowing facilitation of sanctions-evasion or deceptive shipping activities may expose the concerned organization or individual to legal, financial, administrative and reputational consequences.

14.5 Any non-compliance, deliberate concealment of vessel identity, processing of fraudulent documentation, submission of false information through PSW or facilitation of vessels engaged in prohibited or unlawful activities shall be reported to DGPS for appropriate action under the Merchant Shipping Ordinance, 2001(as amended), and any other applicable laws of Pakistan.

14.6 Such action shall be without prejudice to any civil, administrative, regulatory or criminal proceedings that may be initiated by the competent authorities under applicable law.

14.7 Nothing contained in this Circular shall be construed as limiting the statutory powers of Pakistan Customs, Immigration Authorities, Port Authorities, law-enforcement agencies, maritime security agencies or any other competent authority.

14.8 Where a matter falls outside the statutory jurisdiction of DGPS, the matter shall be referred to the appropriate competent authority for necessary action.

15. COMPLIANCE AND EFFECTIVE DATE

15.1 All Port Authorities, PSW, Shipping Agents, Port Agents, Ship Recycling Facilities, Recognized Organizations, Pakistani Flag Shipowners/Operators and other concerned maritime stakeholders are directed to ensure strict compliance with this Circular.

15.2 The concerned organizations shall circulate this Circular to their relevant departments, officers, agents and operational personnel and shall establish appropriate internal procedures for its implementation.

15.3 This Circular shall come into force with **immediate effect**.

15.4 This Circular shall remain in force until amended, withdrawn or superseded by this Directorate or by competent Government authority.

15.5 This Circular is issued with the approval of the Competent Authority.

(Capt. Rafaqat Hussain)
Chief Nautical Surveyor
Directorate General Ports & Shipping
Government of Pakistan

Copy to:

1. Director General, Ports & Shipping Wing, Karachi.
2. Principal Officer, Mercantile Marine Department, Karachi.
3. Chairman, Karachi Port Trust, Karachi.
4. Chairman, Port Qasim Authority, Karachi.
5. Chairman, Gwadar Port Authority, Gwadar.
6. Gadani Ship Breaking Yards.
7. In-charge, Pakistan Single Window (PSW).
8. Pakistan Recognized Organizations (ROs).
9. All Shipping and Port Agents.
10. All concerned for information and strict compliance.