

# From listing to interdiction

## The UK's 16 June 2026 Russia sanctions package and the OFSI interdiction general licence

16 June 2026

On 16 June 2026, as the prime minister attended the G7 summit, the UK announced a major new package under the Russia sanctions regime: 70 additions to the UK Sanctions List, running from RUS3620 to RUS3689, directed at Russia's ageing "shadow fleet", its military-procurement supply chains and the illicit-finance networks used to circumvent Western sanctions.

The headline figure is best understood as a bundle of two different legal instruments: 43 newly designated persons and entities subject to asset-freeze and related restrictions, and 27 newly specified ships subject to ship-specific transport and trade sanctions. The package is the most visible element of a wider shift. Over the preceding month the UK had quietly assembled the legal machinery for active enforcement at sea, and two days before the package it used that machinery for the first time, boarding and detaining the tanker SMYRTOS in the English Channel. Read together, the enabling powers, the operation and the new designations show the UK moving from passive listing towards an active, repeatable interdiction posture.<sup>1</sup>

### Background

The Foreign, Commonwealth and Development Office (FCDO) sanctions notice records the 70 additions, while the government frames the action as choking off Russia's war effort across multiple fronts. The package targets more than 20 oil tankers using powers enhanced the previous month, together with several vessels linked to Russian liquefied natural gas (LNG); on the government's own account, the UK has now sanctioned more than 600 shadow-fleet and Russian LNG vessels, and almost 500 individuals, entities and ships under the Russia regime in 2026 alone. Alongside the maritime measures it exposes a military-intelligence procurement network centred on the alleged Main Directorate of the General Staff of the Armed Forces of the Russian Federation (GRU) front company LLC Neptune Co Ltd, designating three connected companies and 10 individuals identified as GRU officers, and reaches third-country suppliers of military and dual-use goods in China, Thailand and Türkiye, together with banks and alternative-finance facilitators linked to the so-called A7 circumvention infrastructure.<sup>2</sup>

The design is deliberately systemic. Shadow-fleet activity depends not only on vessels, but on beneficial owners, managers, bunkering, insurance, crew, port and anchorage services, finance and documentation. Russian military procurement depends on front companies, logistics, third-country suppliers, payment rails and human procurement officers. The designations map onto those dependencies rather than naming assets in isolation, and a significant share of the targets sit outside Russia, in China and Hong Kong, Thailand, Türkiye, Laos and Nigeria. The sections that follow explain the distinction between designated persons and specified ships, the powers and the Office of Financial Sanctions Implementation (OFSI) licence that together made an interdiction executable, the SMYRTOS operation that drew on them, and the compliance implications for maritime, finance and trade businesses.

### Designated persons and specified ships

The single most important point for compliance teams is that the 70 additions are not all the same kind of measure, and the two categories carry different obligations. The 43 designated persons and entities are subject to an asset freeze, and to the prohibition on dealing with their funds or economic resources or making funds or economic resources available to them or for their benefit, unless an exception or licence applies. Many entries also carry trust-services and director-disqualification sanctions, designated individuals carry travel bans, and the newly listed banks, together with a Laos-incorporated bank, carry correspondent-banking and payment-processing prohibitions. For these entries, ownership-and-control analysis is essential, because the freeze reaches entities owned or controlled by a designated person even where the subsidiary is not itself named.<sup>3</sup>

1 [UK clamps down on shady networks supplying Putin's illegal war with new sanctions package](#) (GOV.UK, 16 June 2026); FCDO, Sanctions Notice: Russia (16 June 2026), recording 70 additions RUS3620–RUS3689.

2 [UK clamps down on shady networks supplying Putin's illegal war with new sanctions package](#) (GOV.UK, 16 June 2026).

3 [The Russia \(Sanctions\) \(EU Exit\) Regulations 2019](#), SI 2019/855; on the asset-freeze and making-available prohibitions and on ownership and control; vid., OFSI's UK financial sanctions general guidance.

The 27 vessel entries are ship specifications rather than asset-freeze designations. They are specified under Regulation 57F of the Russia (Sanctions) (EU Exit) Regulations 2019 for the purposes of shipping and specified-ship trade sanctions. The operative consequences include the prohibition on chartering or operating a specified ship, port-entry refusal and port-entry, movement and detention directions, registration consequences and prohibitions on providing or procuring a wide range of services relating to specified ships, including technical assistance, crewing, brokering, insurance and finance. For shipping, trade-finance, insurance and maritime-service teams the durable control point is the International Maritime Organisation (IMO) number: names, flags, registered owners and managers can change quickly, so the IMO number should be the primary key for screening and voyage diligence rather than the vessel name.<sup>4</sup>

This vessel-specification regime rests on a legal platform laid earlier in the year. Amending regulations passed in May 2026 inserted or expanded the specified-ship service prohibitions, and the prohibition on chartering or operating such ships, broadened the secretary of state's specification architecture to capture further Russian energy cargoes including LNG, and introduced restrictions on processed oil products. Crucially for what followed, that same architecture carries enforcement powers, the directions to refuse entry, to require movement and to detain a specified ship, that allow the state to act physically against a vessel rather than merely list it. Those powers are what make an interdiction at sea legally possible; but exercising them creates a practical problem of its own, which the OFSI licence discussed below was designed to solve.<sup>5</sup>

## The OFSI interdiction general licence

The problem is this: boarding, detaining and managing a sanctioned vessel and its cargo necessarily involves dealings, towage, anchorage, crewing, technical and safety services, as well as the payments that go with them, that the asset-freeze and maritime-services prohibitions would otherwise block, so that the state and its contractors could find themselves tripping over the very prohibitions they enforce. General Licence INT/2026/9559192, issued by the OFSI under Regulation 64 of the Russia Regulations and in force from 12 June 2026, removes that friction. It is a class permission rather than a licence to a named applicant, allowing defined categories of actor to do specified things that would otherwise breach the prohibitions, provided its conditions are met. It defines an "interdiction" as action taken to facilitate, enable or otherwise support His Majesty's Government (HMG) in exercising its ship movement and detention powers, and it permits HMG-contracted or HMG-directed persons, who must not themselves be designated, to take the steps necessary to enable and enact an interdiction, to make funds available for the benefit of a designated person solely to that end, and relevant UK financial institutions to process the related payments.<sup>6</sup>

The licence is narrow, and its central design feature is the distinction between making funds "available to" a designated person and making them available "for the benefit of" one. It does not permit funds or economic resources to be made available to a designated person; it permits funds to be made available for that person's benefit only where necessary to enable or enact an interdiction. That solves the unavoidable incidental benefit that arises when the state takes control of a sanctioned vessel or cargo, without opening any general commercial payment route. It is emphatically not private-sector relief: unless the actor is contracted or directed by HMG and the activity is solely to enable or enact an interdiction, the licence should not be assumed to apply, and it does not authorise ordinary dealings with designated persons, specified ships, Russian-origin oil or oil products, Russian LNG or sanctioned maritime services. Those relying on it must keep accurate, complete and legible records for at least six years, so reliance should be documented as a regulated sanctions-control event.<sup>7</sup>

## SMYRTOS and the commercial-provenance frontier

In the early hours of 14 June 2026, Royal Marine commandos and National Crime Agency officers boarded SMYRTOS (IMO 9389100) in the English Channel and detained it off the south coast; prosecutors have since charged its master with a sanctions offence relating to the carriage of Russian oil. Three points fix the sequence and dispel any impression that the new package drove the seizure. First, SMYRTOS was not a new target: it had been a specified ship under the UK regime since 15 October 2025, and so was already subject to the full range of shipping prohibitions long before June. Second, the immediate legal trigger was the vessel's loss of its Cameroon registration shortly beforehand, which left it effectively stateless and so exposed to boarding under the international law right of visit, alongside the UK's own enforcement powers. Third, the order of events runs from cause to confirmation: the enforcement powers were enhanced in May, the OFSI licence took effect on 12 June, the boarding followed on 14 June, the captain was charged and the licence publicly acknowledged on 15 June and only on 16 June did the wider package appear. What the licence supplied, two days ahead, was the legal cover for the towage, anchorage, payment and support activity that detaining and holding the vessel would require, and the package that followed widened the target set for the same strategy.<sup>8</sup>

Reporting traces SMYRTOS, formerly MYRTOS, from a sale by a mainstream owner to an offshore buyer, through third-country management, to a later re-sale to an entity said to own other shadow-fleet vessels. The previous owner has said that he acted in line with applicable sanctions regimes and that the authorities were duly aware of the sale, and the account is not proof that any prior owner breached sanctions. The lesson is that, for a vessel sale, a name screen and a current-list check are no longer enough; sellers should

4 [Russia \(Sanctions\) \(EU Exit\) Regulations 2019, reg 57F](#) (specification of ships); FCDO, Sanctions Notice: Russia (16 June 20

5 [The Russia \(Sanctions\) \(EU Exit\) \(Amendment\) Regulations 2026](#), SI 2026/543.

6 [OFSI General Licence INT/2026/9559192](#), issued under reg 64 of the Russia Regulations (effective 12 June 2026; listed 15 June 2026).

7 [UK forces intercept Russian shadow fleet vessel for the first time](#) (Ministry of Defence, 14 June 2026); [Captain charged over sanctions breach](#) (Crown Prosecution Service, 15 June 2026); SMYRTOS (IMO 9389100) was a specified ship under the UK regime from 15 October 2025.

8 [Financial Times](#), reporting on the provenance of SMYRTOS.

diligence the buyer, beneficial owner, manager, financier, insurer, flag, intended trade and likely re-sale chain, as well as consider contractual no-Russia and resale restrictions with audit and notification rights.<sup>9</sup>

## Immediate compliance implications

For firms, several steps follow immediately. Screen the 43 new designations with ownership-and-control analysis, allowing for aliases and Cyrillic, Chinese, Thai and Lao scripts, and screen the 27 specified ships by IMO number rather than name. Banks and payment firms should update correspondent-banking and payment-processing controls for the newly listed banks and the A7-linked third-country facilitators. Shipping and energy-logistics businesses, insurers, brokers, bunkering suppliers, crewing and port agents and charterers should map their exposure to the specified ships, and to the services caught by the specified-ship prohibitions, while exporters of electronics, navigation equipment, semiconductors and machine tools refresh military end-use controls against the Neptune and GRU cluster, as well as the named suppliers. The interdiction general licence should be treated as HMG-operational only and never as a commercial work-around. Recurring red flags include older vessels sold above commercial value to opaque special-purpose vehicles, rapid reflagging or manager changes after sale and payments routed through new agents, opaque fintech or crypto rails or third-country banks linked to circumvention networks.

## Outlook

Read as a whole, the package is best understood not as a routine list update but as the visible part of a sequenced enforcement design: powers enhanced in May, financial cover supplied by the 12 June licence, the capability used against SMYRTOS on 14 June and the target set widened on 16 June. The licence is the sanctions-law plumbing that lets the state and its directed support ecosystem handle interdiction-related funds, services and payments without being blocked by the prohibitions being enforced and the SMYRTOS boarding shows the UK is now prepared to move from list-based pressure to boarding, detention, investigation and prosecution where the legal conditions, there the loss of flag, permit. Two trajectories are worth watching: whether the UK repeats the model against other vessels as they lose registration or otherwise become exposed, and how far enforcement reaches back along the commercial chain into sellers, brokers, managers, insurers and financiers. For now, the priority is precise data hygiene, names, aliases, scripts, IMO numbers, directors, owners and service relationships, because in maritime sanctions a weak identifier strategy is itself a substantive control failure. This alert is a research and compliance-orientation summary and not legal advice; operational decisions should rest on live UK Sanctions List screening, the licence text in force at the time of action, and case-specific advice.

<sup>9</sup> Vid., FCDO, Sanctions Notice: Russia (16 June 2026); [Estonian Foreign Intelligence Service, International Security and Estonia 2026](#) (GRU dual-use procurement); and [IMO Resolution A.1192\(33\)](#).

## How we can help

Our International Trade & Foreign Investment Practice advises banks, payment and fintech firms, shipowners and managers, charterers, commodity traders, insurers and brokers, exporters and corporates on UK, EU and US sanctions and their interaction. We help clients with sanctions screening and ownership-and-control analysis, vessel and counterparty due diligence, specified-ship and shadow-fleet exposure, OFSI licensing and general-licence reliance, export controls and military end-use risk, as well as sanctions-circumvention and investigations work. If you would like to discuss the implications of the 16 June package or the interdiction general licence for your business, please contact any member of the team listed below.

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