



OCTOBER 22, 2012

CIRCULAR NO. 28/12

TO MEMBERS OF THE ASSOCIATION

Dear Member:

ADDITIONAL EU ECONOMIC SANCTIONS WITH RESPECT TO IRAN AND SYRIA

Members should be aware that on October 15, 2012, the European Union (EU), in response to deepening concerns over Iran's nuclear program, intensified and expanded economic sanctions against Iran. At the same time, it reaffirmed the EU's *"longstanding commitment to work for a diplomatic solution to the Iranian nuclear issue in accordance with the dual track approach."*

The EU on October 15, 2012 also took steps to strengthen sanctions against Syria.

Iran

The additional sanctions with respect to Iran can be summarized as follows.

The EU's October 15 decisions target Iran's nuclear and ballistic programs and the revenues of the Iranian government for these programs. In particular, the EU Council took further measures to ensure that EU financial institutions do not process funds that could contribute to Iran's nuclear program or to the development of ballistic missiles. The EU has therefore prohibited all transactions between European and Iranian banks, unless they are explicitly authorized in advance by national authorities under strict conditions. Under these conditions, authorized trade can continue. In addition, the Council decided to strengthen the restrictive measures against the Central Bank of Iran.

The Council also banned the export to Iran of further materials relevant to the Iranian nuclear and ballistic program or to industries controlled by the Iranian Revolutionary Guard Corps. This concerns, in particular, graphite, raw or semi-finished metals, such as aluminum and steel, as well as software for integrating industrial processes. The prohibition also includes related technical or financial assistance.

The Council also banned the import of natural gas from Iran into the EU. This concerns the importation, purchase and transport of gas, as well as finance and insurance related to these activities. In addition, the Council agreed to broaden the existing export ban on key equipment for the Iranian oil, gas and petrochemical industries.

Vessels belonging to EU citizens and companies may no longer be used for transporting or storing Iranian oil and petrochemical products. Further, the involvement of EU industries in the construction of new oil tankers for Iran will no longer be permitted and key naval equipment and technology for ship building and maintenance can no longer be supplied to Iran. The Council also banned flagging and classification services for Iranian oil tankers and cargo vessels.

EU member states also decided to stop supporting trade with Iran through new short-term export credits, guarantees or insurance. Medium- and long-term commitments were already previously prohibited.

Finally, the Council targeted 34 additional Iranian entities providing substantial financial support to the Iranian government and one person involved in the Iranian nuclear program with an asset freeze and a travel ban. This concerns notably entities active in the oil and gas industry and in the financial sector.



Implementing legislation, which the Council still has to adopt, will define precisely which items are covered by the export bans.

The decision of October 15, together with the list of additional designations, has been published in the Official Journal of the EU 16 October 2012 (copy attached).

Syria

With respect to Syria, the Council added 28 persons responsible for the violent repression against the civilian population to the list of those subject to a travel ban and an asset freeze. At the same time, two additional entities were targeted with a freeze of their assets in the EU.

The Council also took further steps in respect of arms, prohibiting the import into the EU of arms from Syria, or any EU involvement in the transport of Syrian arms. The Council also banned EU nationals and enterprises from supplying financial services to Syrian arms exports, including insurance and re-insurance. No EU citizens or companies must be involved in Syrian military cooperation with third countries, which could benefit the Syrian regime.

The Council also denied all flights operated by Syrian Arab Airlines access to EU airports. The airline is also subject to an asset freeze. This comes in addition to an existing ban on Syrian cargo flights.

The Council's decision of October 15, 2012 brings the total number of targeted persons and entities to 181 individuals and 54 entities.

Members whose entities are organized and exist under the laws of an EU member state, whose offices are based in an EU member state, whose vessels are flagged within the EU, and/or whose banking arrangements are based in an EU member state will be required to comply with the foregoing new prohibitions.

In this regard, Members are encouraged to take the necessary steps within their respective organizations to exercise due diligence and ensure compliance with these sanctions. Such preventive measures are necessary since any voyage or trade performed in violation of these new sanctions may constitute risks that are excluded by the Club's Rules: See Class I, Rule 3, Section 1.3 through 1.5. American Club coverage will not extend to any voyage or activity of a Member involving Iran or Syria if the Member is prohibited from engaging in such voyage or activity under EU sanctions laws and regulations.

Lastly, it should be noted for clarity's sake that the EU prohibitions referenced above would not apply to the Club's Members outside the jurisdiction of the EU or not subject to EU laws and regulations. As a US entity, the Association is fully subject to US laws and regulations governing sanctions against Iran and Syria.

Yours faithfully,


Joseph E.M. Hughes, Chairman & CEO
Shipowners Claims Bureau, Inc., Managers for
THE AMERICAN CLUB

COUNCIL IMPLEMENTING REGULATION (EU) No 945/2012
of 15 October 2012
implementing Regulation (EU) No 267/2012 concerning restrictive measures against Iran

THE COUNCIL OF THE EUROPEAN UNION

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Council Regulation (EU) No 267/2012 of 23 March 2012 concerning restrictive measures against Iran ⁽¹⁾, and in particular Article 46(2) thereof,

Whereas:

- (1) On 23 March 2012, the Council adopted Regulation (EU) No 267/2012 concerning restrictive measures against Iran.
- (2) In view of the situation in Iran, and in accordance with Council Decision 2012/635/CFSP of 15 October 2012 amending Decision 2010/413/CFSP concerning restrictive measures against Iran ⁽²⁾, the Council considers that additional persons and entities should be included in the list of natural and legal persons, entities and bodies subject to restrictive measures set out in

Annex IX to Regulation (EU) No 267/2012. Heading I in Annex IX to Regulation (EU) No 267/2012 should therefore be amended.

- (3) Furthermore, the entry for one entity included in the list set out in Annex IX to Regulation (EU) No 267/2012 should be amended, while certain persons and entities should be removed from that list.
- (4) In order to ensure that the measures provided for in this Regulation are effective, this Regulation should enter into force on the day of its publication,

HAS ADOPTED THIS REGULATION:

Article 1

Annex IX to Regulation (EU) No 267/2012 shall be amended as set out in the Annex to this Regulation.

Article 2

This Regulation shall enter into force on the date of its publication in the *Official Journal of the European Union*.

This Regulation shall be binding in its entirety and directly applicable in all Member States.

Done at Luxembourg, 15 October 2012.

For the Council
The President
C. ASHTON

⁽¹⁾ OJ L 88, 24.3.2012, p. 1.

⁽²⁾ See page 58 of this Official Journal.

ANNEX

I. Heading I in Annex IX to Regulation (EU) No 267/2012 shall be replaced by the following:

"Persons and entities involved in nuclear or ballistic missile activities and persons and entities providing support to the Government of Iran."

II. The persons and entities listed below shall be added to the list set out in Annex IX to Regulation (EU) No 267/2012:

A. Person

	Name	Identifying information	Reasons	Date of listing
1.	Majid NAMJOO	Born on 5 January 1963 in Tehran, Iran	Minister of Energy. Member of the Supreme National Security Council, which formulates Iran's nuclear policy.	16.10.2012

B. Entities

	Name	Identifying information	Reasons	Date of listing
1.	Ministry of Energy	Palestine Avenue North, next to Zarathustra Avenue 81, tel. 9-8901081.	Responsible for policy in the energy sector, which provides a substantial source of revenue for the Iranian Government.	16.10.2012
2.	Ministry of Petroleum	Taleghani Avenue, next to Hafez Bridge, tel. 6214-6153751	Responsible for policy in the oil sector, which provides a substantial source of revenue for the Iranian Government.	16.10.2012
3.	National Iranian Oil Company (NIOC)	NIOC HQ, National Iranian Oil Company Hafez Crossing, Taleghani Avenue Tehran - Iran/First Central Building, Taleghan St., Tehran, Iran, Postal Code: 1593657919 P.O. Box 1863 and 2501	State-owned and operated entity providing financial resources to the Government of Iran. The Minister of Oil is Director of the NIOC Board and the Deputy Minister of Oil is the Managing Director of NIOC.	16.10.2012
4.	National Iranian Oil Company (NIOC) PTE LTD	7 Temasek Boulevard #07-02, Suntec Tower One 038987, Singapore; Registration ID 199004388C Singapore	Subsidiary of the National Iranian Oil Company (NIOC).	16.10.2012
5.	National Iranian Oil Company (NIOC) International Affairs Limited	NIOC House, 4 Victoria Street, London SW1H 0NE, United Kingdom; UK Company Number 02772297 (United Kingdom)	Subsidiary of the National Iranian Oil Company (NIOC).	16.10.2012
6.	Iran Fuel Conservation Organization (IFCO)	No. 23 East Daneshvar St. North Shiraz St. Molasadra St. Vanak Sq. Tehran Iran Tel.: (+98) 2188604760-6	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012

	Name	Identifying information	Reasons	Date of listing
7.	Karoon Oil & Gas Production Company	Karoon Industrial Zone Ahwaz Khuzestan Iran Tel.: (+98) 6114446464	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
8.	Petroleum Engineering & Development Company (PEDEC)	No. 61 Shahid Kalantari St. Sepahbod Qarani Ave. Tehran Iran Tel.: (+98) 2188898650-60	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
9.	North Drilling Company (NDC)	No. 8 35th St. Alvand St. Argentine Sq. Tehran Iran Tel.: (+98) 2188785083-8	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
10.	Khazar Expl & Prod Co (KEPCO)	No. 19 11th St. Khaled Eslamboli St. Tehran Iran Tel.: (+98) 2188722430	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
11.	National Iranian Drilling Company (NIDC)	Airport Sq. Pasdaran Blvd. Ahwaz Khuzestan Iran Tel.: (+98) 6114440151	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
12.	South Zagros Oil & Gas Production Company	Parvaneh St. Karimkhan Zand Blvd. Shiraz Iran Tel.: (+98) 7112138204	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
13.	Maroun Oil & Gas Company	Ahwaz-Mahshahr Rd. (Km 12) Ahwaz Iran Tel.: (+98) 6114434073	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
14.	Masjed-soleyman Oil & Gas Company (MOGC)	Masjed Soleyman Khuzestan Iran Tel.: (+98) 68152228001	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
15.	Gachsaran Oil & Gas Company	Gachsaran Kohkiluye-va-Boyer Ahmad Iran Tel.: (+98) 742222581	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012

	Name	Identifying information	Reasons	Date of listing
16.	Aghajari Oil & Gas Production Company (AOGPC)	Naft Blvd. Omidieh Khouzestan Iran Tel.: (+98) 611914701	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
17.	Arvandan Oil & Gas Company (AOGC)	Khamenei Ave. Khoramshar Iran Tel.: (+98) 6324214021	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
18.	West Oil & Gas Production Company	No. 42 Zan Blvd. Naft Sq. Kermanshah Iran Tel.: (+98) 8318370072	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
19.	East Oil & Gas Production Company (EOGPC)	No. 18 Payam 6 St. Payam Ave. Sheshad Dastgah Mashhad Iran Tel.: (+98) 5117633011	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
20.	Iranian Oil Terminals Company (IOTC)	No. 17 Beyhaghi St. Argentine Sq. Tehran Iran Tel.: (+98) 2188732221	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
21.	Pars Special Economic Energy Zone (PSEEZ)	Pars Special Economic Energy Zone Org. Assaluyeh Boushehr Iran Tel.: (+98) 7727376330	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
22.	Iran Liquefied Natural Gas Co.	No. 20, Alvand St, Argentina Sq, Tehran, 1514938111 IRAN Tel: +9821 888 77 0 11 Fax: +9821 888 77 0 25 info@iranlng.ir	Subsidiary of National Iranian Oil Company (NIOC).	16.10.2012
23.	Naftiran Intertrade Company (a.k.a. Naftiran Trade Company) (NICO)	Tel.: (+41) 213106565 OG 1 International House The Parade St. Helier JE3QQ Jersey, UK	Subsidiary (100 %) of the National Iranian Oil Company (NIOC).	16.10.2012
24.	Naftiran Intertrade Company Srl	Sàrl Ave. De la Tour-Haldimand 6 1009 Pully Schweiz	Subsidiary (100 %) of the Naftiran Intertrade Company Ltd.	16.10.2012

	Name	Identifying information	Reasons	Date of listing
25.	<p>Petroiran Development Company (PEDCO) Ltd</p> <p>(a.k.a. PetroIran; a.k.a. "PEDCO")</p>	<p>National Iranian Oil Company - PEDCO, P.O. Box 2965, Al Bathaa Tower, 9th Floor, Apt. 905, Al Buhaira Corniche, Sharjah, United Arab Emirates;</p> <p>P.O. Box 15875-6731, Tehran, Iran; 41, 1st Floor, International House, The Parade, St. Helier JE2 3QQ, Jersey;</p> <p>No. 22, 7th Lane, Khalid Eslamboli Street, Shahid Beheshti Avenue, Tehran, Iran;</p> <p>No. 102, Next to Shahid Amir Soheil Tabrizian Alley, Shahid Dastgerdi (Ex Zafar) Street, Shariati Street, Tehran 19199/45111, Iran;</p> <p>Kish Harbour, Bazargan Ferdos Warehouses, Kish Island, Iran;</p> <p>Registration ID 67493 (Jersey)</p>	Subsidiary of Naftiran Intertrade Company Ltd.	16.10.2012
26.	<p>Petropars Ltd.</p> <p>(a.k.a. Petropasr Limited; a.k.a. "PPL")</p>	<p>Calle La Guairita, Centro Profesional Eurobuilding, Piso 8, Oficina 8E, Chuao, Caracas 1060, Venezuela;</p> <p>No. 35, Farhang Blvd., Saadat Abad, Tehran, Iran;</p> <p>P.O. Box 3136, Road Town, Tortola, Virgin Islands, British;</p> <p>all offices worldwide.</p>	Subsidiary of Naftiran Intertrade Company Ltd.	16.10.2012
27.	<p>Petropars International FZE</p> <p>(a.k.a. PPI FZE)</p>	<p>P.O. Box 72146, Dubai, United Arab Emirates;</p> <p>all offices worldwide</p>	Subsidiary of Petropars Ltd.	16.10.2012

	Name	Identifying information	Reasons	Date of listing
28.	Petropars UK Limited	47 Queen Anne Street, London W1G 9JG, United Kingdom; UK Company Number 03503060 (United Kingdom); all offices worldwide	Subsidiary of Petropars Ltd.	16.10.2012
29.	National Iranian Gas Company (NIGC)	(1) National Iranian Gas Company Building, South Aban Street, Karimkhan Boulevard, Tehran, Iran (2) P.O. Box 15875, Tehran, Iran (3) NIGC Main Bldg. South Aban St. Karimkhan Ave., Tehran 1598753113, Iran	State-owned and operated entity that provides financial resources to the Government of Iran. The Minister of Oil is Chairman of NIGC's Board and the Deputy Oil Minister is Managing Director and Vice Chairman of NIGC.	16.10.2012
30.	National Iranian Oil Refining and Distribution Company (NIORDC)	4 Varsho Street, Tehran 1598666611, P.O. Box 15815/3499 Tehran	State-owned and operated entity that provides financial support to the Government of Iran. The Minister of Oil is Chairman of NIORDC's Board.	16.10.2012
31.	National Iranian Tanker Company (NITC)	35 East Shahid Atefi Street, Africa Ave., 19177 Tehran, P.O. Box: 19395-4833, Tel: +98 21 23801, Email: info@nitc-tankers.com; all offices worldwide	Effectively controlled by the Government of Iran. Provides financial support to the Government of Iran through its shareholders which maintain ties with the Government.	16.10.2012
32.	Trade Capital Bank	220035 Belarus Timiriazeva str. 65A Tel: +375 (17) 3121012 Fax +375 (17) 3121008 e-mail: info@tcbank.by	Subsidiary (99 %) of Tejarat Bank.	16.10.2012
33.	Bank of Industry and Mine	No. 2817 Firouzeh Tower (above park way junction) Valiaar St. Tehran Tel. 021-22029859 Fax: 021-22260272-5	State owned company which provides financial support to the Government of Iran.	16.10.2012
34.	Cooperative Development Bank (a.k.a. Tose'e Ta'avon Bank)	Bozorgmehr St. Vali-e Asr Ave Tehran Tel: +(9821) 66419974 / 66418184 Fax: (+9821) 66419974 e-mail: info@sandoghtavon.gov.ir	State owned company which provides financial support to the Government of Iran.	16.10.2012

III. The entry for the entity set out in Annex IX to Regulation (EU) No 267/2012 listed below shall be replaced by the following:

B. Entities

Name	Identifying information	Reasons	Date of listing
Central Bank of Iran (a.k.a. Central Bank of the Islamic Republic of Iran)	Postal Address: Mirdamad Blvd., NO. 144, Tehran, Islamic Republic of Iran P.O. Box: 15875 / 7177 Switchboard: +98 21 299 51 Cable Address: MARKAZBANK Telex: 216 219-22 MZBK IR SWIFT Address: BMJIIRTH Web Site: http://www.cbi.ir E-mail: G.SecDept@cbi.ir	Involved in activities to circumvent sanctions. Provides financial support to the Government of Iran.	23.1.2012

IV. The persons and entities listed below shall be deleted from the list set out in Annex IX to Regulation (EU) No 267/2012:

1. Mohammad MOKHBER
2. Hassan BAHADORI
3. Dr. Peyman Noori BROJERDI
4. Dr. Mohammad JAHROMI
5. Mahmoud Reza KHAVARI
6. Dr M H MOHEBIAN
7. Bahman VALIKI
8. Pouya Control
9. Boustead Shipping Agencies Sdn Bhd
10. OTS Steinweg Agency.