

# Shadow fleet sails under false flags of the Kingdom of the Netherlands

News

29 August 2025

#Safety

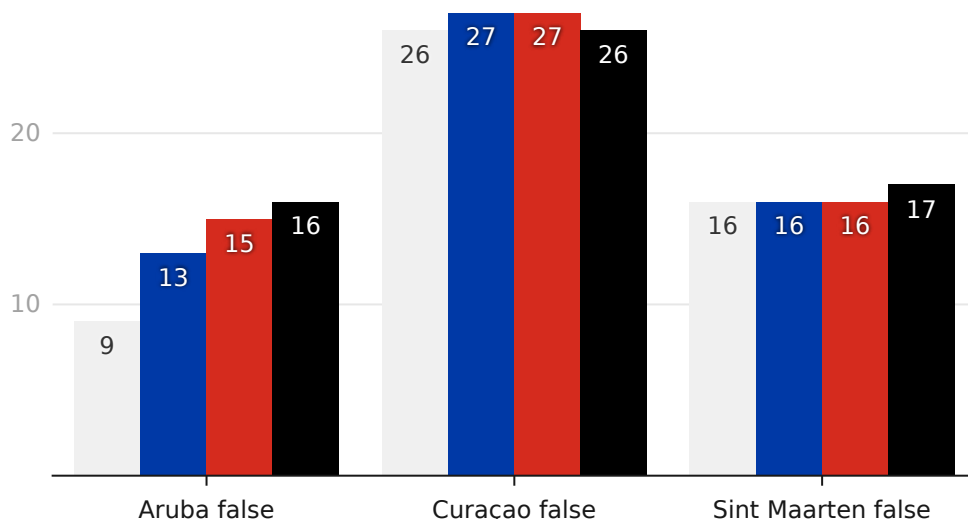
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The shadow fleet is generally finding it increasingly difficult to stay operational. Recent research by investigative journalism platform Follow The Money shows that operators of shadow fleet ships for the benefit of Russian overseas trade are quite inventive in circumventing the sanctions. While various ship registers, such as the register of Panama, are taking action to expel the Russian shadow fleet from their registers, are these ships suddenly sailing under nonexistent flags.

Currently, there are ships from the Russian shadow fleet also sailing under the flags of Aruba and Sint Maarten. However, both countries in the Kingdom of the Netherlands do not have a flag register for sea-going ships and therefore do not issue Certificate of Registry. A weekly check by the KVNR in August 2025 in an authoritative international database revealed that several dozen ships are fraudulently flying the flags of Aruba, Sint Maarten, and Curaçao. This number is changing regularly.

## Shadow fleet under false flags of the Kingdom of the Netherlands

7 August 2025 14 August 2025 21 August 2025 28 August 2025



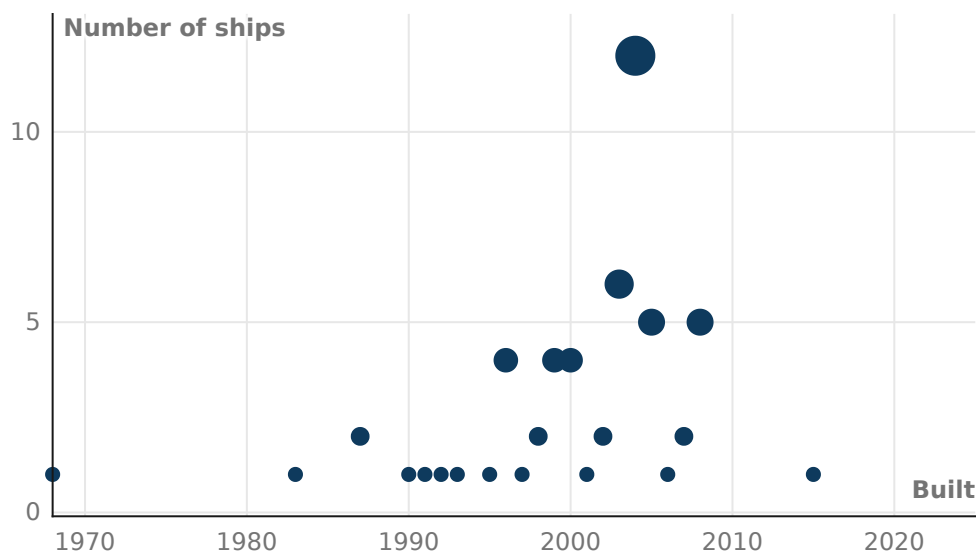
## Dutch shipowners concerned

The registers for sea-going ships in the Kingdom are located in the countries of the Netherlands and Curaçao. Ships listed in these registers sail under the so-called Kingdom flag. The KVNR considers the flying of fraudulent flags to be very damaging to the reputation of the Netherlands and Curaçao. This practice also affects the Dutch shipowners who are rightfully entitled to fly the Kingdom flag. The KVNR is also concerned about the safety and working conditions of the seafarers on board these ships.

There are also concerns about the potential environmental risks posed by these shadow fleet ships. These are often oil tankers whose technical condition often leaves much to be desired, increasing the risk of environmental disasters. The internationally required insurance against, for example, oil pollution is often issued by dubious insurance companies. If an oil leak occurs, the coastal state (read: the taxpayer) will have to bear the costs, as the insurer is likely not solvent and does not have the funds to pay out. And this is aside from situations where a legitimate ship collides with a fraudulent ship. Who can be held liable for the damages? Plenty of reasons to take action against this practise.

## Year of construction of ships in the shadow fleet under false flags of the Kingdom of the Netherlands

Number of ships ○ 1 ○ 4 ○ 10



Data 28 August 2025

Source: KVNR based on S&P Global data • [Download image](#) • Created with [Datawrapper](#)

## Leading Role of the Netherlands

What makes the situation particularly concerning is that these ships sometimes sail close to the Netherlands, specifically through the Dutch Exclusive Economic Zone (EEZ). Because the fraudulent ships claim to fly a flag from one of the countries of the Kingdom, the Netherlands is in a unique position to take a leading role in combating these ships. This can certainly be done within its own waters. However, international law of the sea seems to allow for action even on the high seas against stateless ships. To enforce rules on the high seas, given the available capacity, it would be

*Article 110  
Right of visit*

1. Except where acts of interference derive from powers conferred by treaty, a warship which encounters on the high seas a foreign ship, other than a ship entitled to complete immunity in accordance with articles 95 and 96, is not justified in boarding it unless there is reasonable ground for suspecting that:

- (a) the ship is engaged in piracy;
- (b) the ship is engaged in the slave trade;
- (c) the ship is engaged in unauthorized broadcasting and the flag State of the warship has jurisdiction under article 109;
- (d) the ship is without nationality; or
- (e) though flying a foreign flag or refusing to show its flag, the ship is, in reality, of the same nationality as the warship.

2. In the cases provided for in paragraph 1, the warship may proceed to verify the ship's right to fly its flag. To this end, it may send a boat under the command of an officer to the suspected ship. If suspicion remains after the documents have been checked, it may proceed to a further examination on board the ship, which must be carried out with all possible consideration.

3. If the suspicions prove to be unfounded, and provided that the ship boarded has not committed any act justifying them, it shall be compensated for any loss or damage that may have been sustained.

4. These provisions apply *mutatis mutandis* to military aircraft.

5. These provisions also apply to any other duly authorized ships or aircraft clearly marked and identifiable as being on government service.

*Article 111  
Right of hot pursuit*



 and Water Management

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Date 6 May 2025  
Subject Notification on fraudulent activities

Dear Mr. Secretary General,

On behalf of the Government of the Kingdom of the Netherlands, I would like to inform you about fraudulent activities that have been detected, specifically the issuance of fraudulent certificates and fraudulent applications for seaman's books.

To start with, for some time we are confronted with the issuance of fraudulent certificates such as Certificates of Registry and Certificates of Competencies (CoCs) on behalf of Sint Maarten. Sint Maarten is an independent country within the Kingdom of the Netherlands, and has no international flag registry. Only the Netherlands and Curaçao run an international flag registry within the Kingdom.

The government of Sint Maarten does not issue any Certificate of Competency, seaman's book or ships certificates for motor vessels over 500 GT, nor did Sint Maarten give authorization to any recognized organization or persons to work on their behalf. Sint Maarten does issue several type of ships certificates which are restricted to the Caribbean trading area only.

We are working diligently to take the necessary steps to stop these types of actions from unauthorized persons pretending to be from Sint Maarten or working on their behalf. At this time, Sint Maarten is aware of certain websites imposing to be issuing formal Sint Maarten flag State certificates:

<http://www.msta-registry.com/> and <https://ims-registry.com/vessel-registration/>

These websites are fake websites and issue fraudulent Sint Maarten certificates. Many individuals have invested in certificates via these websites and Sint Maarten has continuously received many inquiries regarding the validity of these documents. For further inquiries, please contact Sint Maarten Maritime Administration: [maritimesxm@sintmaartengov.org](mailto:maritimesxm@sintmaartengov.org)

Secondly, there have been found several cases of fraudulent applications for seaman's book in the Netherlands in the past months. We have identified two different types of fraudulent activities:

1. Fraudulent parties using the logo and signatures of other companies. The company whose logo was used had nothing to do with these applications.



The Dutch government has fortunately been aware of these illegal practices for some time and has reported this to the IMO. At the time of this letter to the IMO, only fraudulent sea letters and certificates of competence were allegedly issued by Sint Maarten. It now appears that this practice has expanded to Aruba and Curaçao. The governments of Sint Maarten, Aruba, and Curaçao have also issued various calls to foreign port authorities to detect these fraudulent activities and, where necessary, initiate criminal prosecution.

The KVNR appreciates the Dutch government's letter as an important step but simultaneously urges the Dutch authorities to do more. The KVNR believes this would be most effective through close collaboration with like-minded countries. Furthermore, it is important for the Netherlands to take concrete action to detain ships flying fraudulent flags of a country within the Kingdom as soon as they enter Dutch waters.

## Get in touch with...

Author



**Lodewijk Wisse**

LEGAL, FINANCIAL AND FISCAL BUSINESS CLIMATE

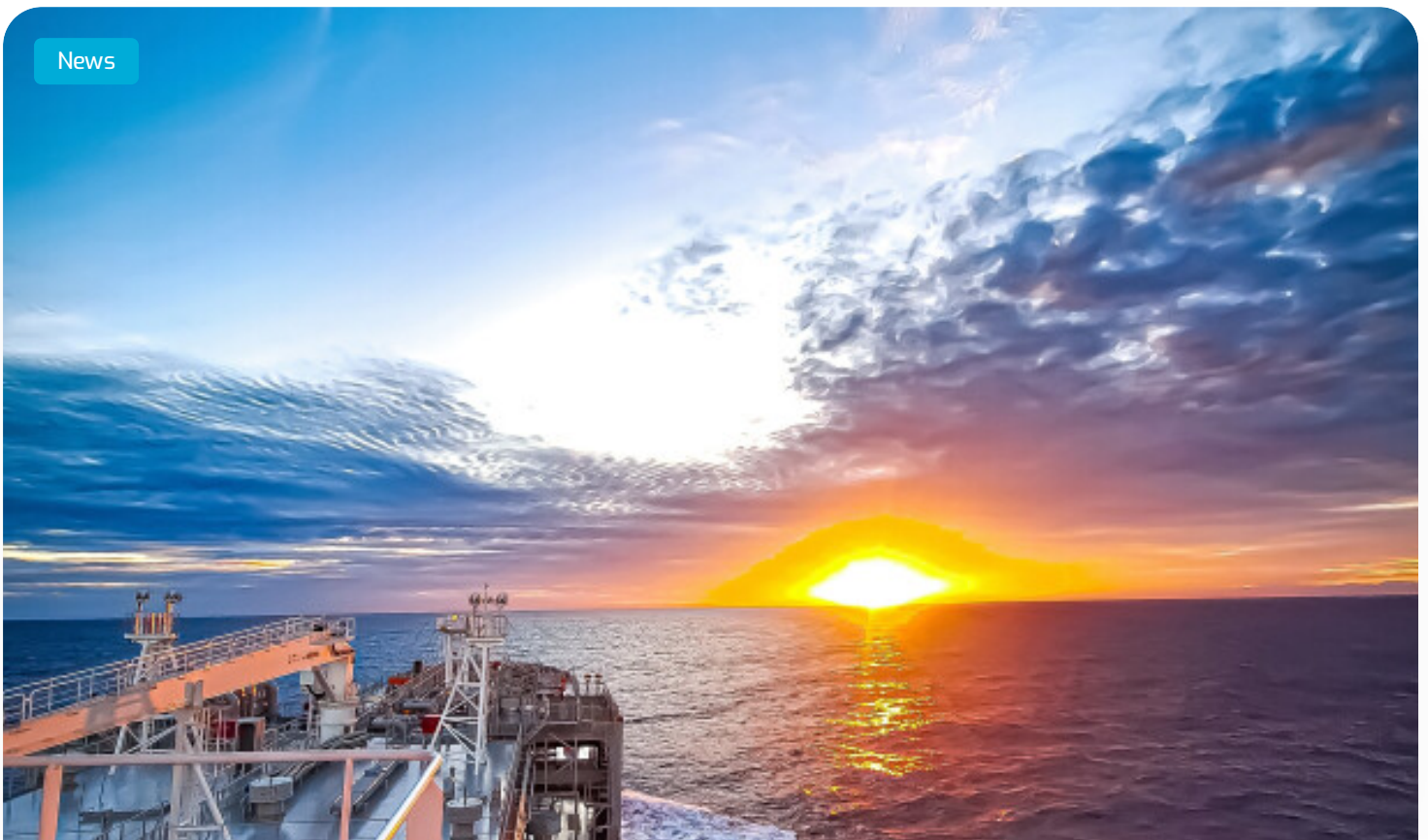
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07-04-2026



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