



## Prime Minister of Greece Kyriakos Mitsotakis

Brussels, 25 April 2025

Dear Prime Minister Kyriakos Mitsotakis,

We are writing to you to express our concerns and to ask for your and your Governments' leading involvement in measures to weaken Russia's shadow fleet, which not only circumvents EU sanctions against Russia for its war of aggression against Ukraine, but also poses an environmental and security threat to our continent and beyond.

Russia's shadow fleet consists of some 600 tankers that are able to carry crude oil and oil products and sell them at a higher price than that imposed by the Price Cap Coalition, generating billions of euros that can be used to fund its war machine and inflict more pain on Ukraine and its people. More than 40 percent of Russia's seaborne oil is being exported from Baltic and Black Sea ports. In addition, locations in the Mediterranean Sea, including those near to Greece, are used for ship-to-ship transfers in order to disguise the source of Russian oil. These actions are like a ticking environmental bomb that could explode into enormous pollution and damage and destruction of marine ecosystems.

We were struck to learn that Greek owners are by far the largest sellers of ships for Russia's shadow fleet. According to a Brookings report based on Bloomberg data<sup>1</sup>, 37 per cent of the 75 Russian shadow fleet oil tankers sanctioned by the US in January 2025 were previously owned by Greek owners. The Brookings report notes that "Greek shipping companies remain the single biggest supplier of ships to the shadow fleet, and operators from Western Europe as a whole supply two-thirds of the shadow fleet shipping capacity". It is estimated that since Russia's full-scale war of aggression against Ukraine, Greek owners have made around \$4 billion from the sale of ageing ships that ended up in Russia's shadow fleet. It should be noted that selling old ships that should be decommissioned and scrapped with the idea that they will continue to carry oil and oil products and become an environmental hazard is a completely irresponsible business practice.

The 12th package of EU sanctions against Russia, adopted in December 2023, agreed on measures to monitor the sale of tankers to third countries in order to prevent them from being used to transport Russian oil above the price cap. We wonder whether your Government had any indications that vessels of Greek owners might end up in Russia's shadow fleet. In particular, since March 2022, Russia has invested enormously in the development of its shadow fleet, so an increased demand and interest in buying Greek vessels should have alerted Greek owners and authorities. Were there any refusals to sell Greek-owned vessels on the suspicion that they might be used by Russia for its illegal activities?

We deeply regret that there were no effective preventive measures to stop the growth of the Russian shadow fleet before and after the imposition of the 12th package of sanctions. As a result, in 2024 alone, Russia's shadow fleet generated approximately \$9.4 billion in additional revenue by circumventing the price cap system.

While we appreciate your expressed position on the need to tackle the sale of Greek-owned vessels that may end up in Russia's shadow fleet, we expect concrete results. We therefore call on you to

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<sup>1</sup> Robin Brooks and Ben Harris, *Where did Russia's shadow fleet come from?*, February 27, 2025

take all necessary measures to prevent any further sale of Greek-owned vessels to Russian-owned entities, entities whose provenance cannot be verified, and entities and countries suspected of collaborating with Russia. In addition, we urge you to continue your active and apparently successful measures to curb illegal and risky ship-to-ship transfers of Russian oil in Greek waters and to discourage Greek companies from transporting Russian oil. These actions are critical not only to curtail Russia's financial means to continue its war against Ukraine, but also to prevent environmental and security threats, to which your country as a maritime nation has already been directly exposed.

We are counting on you and your Government to encourage Greek companies to stand in solidarity with Ukraine and to make them aware that their actions may be supporting Russia's war effort in Ukraine and undermining Greek and European security.

Yours sincerely,

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Pekka Toveri, EPP, Finland

Thijs Reuten, S&D, Netherlands

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