



საგარეო ურთიერთობების მინისტრი  
MINISTER OF FOREIGN AFFAIRS OF GEORGIA

Tbilisi, 18 February 2026

Dear Mr. O’Sullivan,

I wish to express our sincere appreciation for the successful cooperation between Georgia and the European Union in preventing the circumvention of EU sanctions over recent years, built on a foundation of mutual trust and transparency. In this context, I would like to address the potential inclusion of Kulevi Port in Georgia in the EU’s 20th sanctions package.

**Georgia has consistently reaffirmed its unwavering commitment to preventing the circumvention of international sanctions imposed in response to Russia’s aggression against Ukraine.** To this end, our authorities have implemented a comprehensive, risk-based compliance regime across all ports, ensuring that preventive measures—such as mandatory pre-arrival screening, verification of beneficial ownership, scrutiny of insurers and classification societies, AIS history analysis, inter-agency coordination, and denial of port access where sanctions risks are identified—are rigorously applied.

Between 2022 and 2026, 55 vessels were denied entry to Georgian ports due to sanctions-related concerns; over 2,500 sanctioned shipments were returned; and more than 1,750 export and re-export operations were refused. **Importantly, there have been no confirmed instances of sanctions circumvention, irregular shipping practices, or violations of EU restrictive measures at Kulevi Port. Furthermore, Georgian authorities have never received any formal communication raising concerns or indicating non-compliance in this regard.**

It is also important to note that the Kulevi terminal, operated by Black Sea Terminal Ltd., a subsidiary of SOCAR, the State Oil Company of the Republic of Azerbaijan, plays a pivotal role within the Caspian–Black Sea–Europe energy corridor. **It contributes to the diversification of energy routes, strengthens the resilience of Black Sea logistics, and supports the broader Middle Corridor framework.** Any restrictive measures targeting this terminal would have significant repercussions not only for Georgia but also for Azerbaijan’s energy export infrastructure, particularly at a time when energy diversification remains a key strategic priority for the European Union.

Mr. David O’Sullivan,  
EU Sanctions Envoy  
Directorate-General for Financial Stability, Financial Services and Capital Markets Union  
European Commission

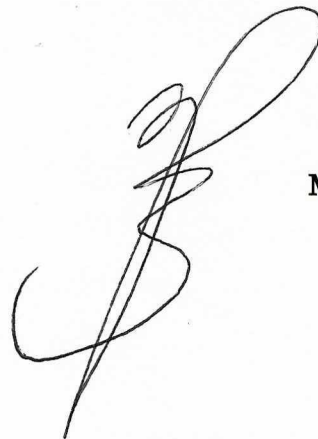
**On behalf of the Government of Georgia, I reaffirm our steadfast commitment to addressing the risks posed by deceptive maritime practices.** Georgia remains fully dedicated to implementing comprehensive, risk-based screening and compliance measures, designed to identify and prevent activities of both “Shadow Fleets” and EU-sanctioned vessels, in strict alignment with IMO Resolution A.1192(33) and Annex XLII of Council Regulation (EU) No 833/2014. We have neither permitted nor will permit EU-sanctioned vessels to enter our ports or receive services, and we will continue to actively support international efforts to combat “Shadow Fleet” practices.

**Following your visit to Georgia, we have strengthened cooperation to ensure sanctions enforcement by establishing communication channels** between the Revenue Service of the Ministry of Finance of Georgia and the relevant EU services — TAXUD, FISMA, FPI, JUST and TRADE — facilitating the monitoring and enforcement of restrictive measures against the Russian Federation, the prompt exchange of information, and mutual assistance, with regular updates and periodic sharing of enforcement data, including operations subject to enhanced control. In parallel, as a beneficiary of the Black & Caspian Sea II (BCSEA II) project, Georgia participates in reciprocal T-AIS data exchange with EU Member States via the SafeSeaNet Mediterranean (MAREΣ) server, enhancing maritime situational awareness, anomaly detection, and coordination on risk indicators through cross-verification of AIS and declared voyage data. **To further institutionalize and strengthen these efforts, the Government of Georgia proposes the establishment of a Structured Operational Channel with the European Union,** including designated contact points, timely case-by-case clarifications, and a feedback system on the effectiveness of measures and decisions adopted by Georgian authorities.

We remain confident that Georgia’s clear stance, combined with our demonstrated commitment to the rigorous implementation of EU restrictive measures, will support the European Commission in reconsidering the proposed inclusion of Kulevi Port in the sanctions list.

Dear Mr. O’Sullivan, Please, accept the assurances of my highest consideration.

Sincerely,



**Maka Botchorishvili**