



G-B INTERNATIONAL

INTERNATIONAL SHIPS REGISTRY OF GUINEA-BISSAU

Technical Service Circular,
IMO Developments
Nr. 02/ 2026, 15/04/2026

Subject: “Safeguarding Flag State Integrity: IMO Guidance on Fraudulent Ship Registrations and Unauthorized Ship Registries”

To: Deputy Registrars, Recognized Organizations (ROs), Shipowners, Ship managers, Operators, Masters, and Seafarers

1. Purpose of the Circular

1.1 The present Technical Service Circular (TSC) is issued by the Guinea-Bissau International Ships Registry (G-B ISR) in order to communicate, among others to shipowners, operators, Recognized Organizations, maritime service providers and relevant stakeholders of the work undertaken within the **framework of the International Maritime Organization (IMO) concerning fraudulent ship registrations** and the operation of fraudulent ship registries.

1.2 The circular aims to clarify the IMO approach to this issue, to present the terminology agreed within the competent IMO Legal Committee, and to highlight the mechanisms through which Member States communicate cases of fraudulent registration practices to the Organization.

1.3 The integrity of the ship registration system constitutes a fundamental element of the international maritime regulatory framework, as it directly affects the attribution of nationality to ships and the effective exercise of Flag State responsibilities under international law.

2. Background and IMO Institutional Context

2.1 The registration of ships and the attribution of nationality constitute core elements of the international maritime governance system established under international law, notably in the framework of the United Nations Convention on the Law of the Sea (UNCLOS) and related IMO instruments governing safety, security, environmental protection and seafarer welfare.

2.2 In recent years, the IMO has addressed a growing number of reports concerning fraudulent ship registrations and the operation of unauthorized registries purporting to act on behalf of sovereign States without the authorization of the competent maritime administration.

2.3 Such practices may involve the unauthorized issuance of ship registration documentation, the misrepresentation of governmental authority, or the fraudulent use of the identity of a flag State in order to provide vessels with a purported nationality outside the legal framework established by that State.

2.4 The issue has been examined by various sessions of the IMO Legal Committee, which has considered the implications of these practices for the credibility of flag State systems, the reliability of international maritime identification mechanisms, and the effectiveness of international maritime regulatory oversight [<https://www.imo.org/en/ourwork/legal/pages/fraudulent-registration-and-fraudulent-registries-of-ships.aspx>].

3. Definitions Adopted within the IMO Legal Committee

3.1 The IMO Legal Committee, at its 108th and 109th sessions, agreed on working definitions relating to fraudulent ship registration practices in order to facilitate a consistent understanding of the phenomenon among Member States and stakeholders.

3.2 In this context, the term fraudulent registration of a ship refers to the intentional misrepresentation of information or documentation through which a vessel is purportedly granted the nationality of a State without authorization by the Government of the misrepresented flag State.

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3.3 The term **fraudulent registry** refers to an unauthorized body or entity that intentionally misrepresents itself as being authorized to register ships on behalf of a flag State, while in reality lacking such authorization from the relevant governmental authority.

3.4 The Legal Committee has further recognized the existence of **forged or false documentation**, which may include documents falsified or forged for the purpose of obtaining or issuing a ship registration certificate, falsified certificates themselves, or documents issued based on knowingly forged or falsified certificates.

3.5 These definitions provide an operational basis for identifying fraudulent practices affecting the ship registration system and for facilitating communication between Member States and the IMO Secretariat.

4. Typical Practices Associated with Fraudulent Ship Registration

4.1 The IMO has observed that fraudulent ship registration schemes often rely on the misappropriation of the identity of legitimate maritime administrations and the dissemination of misleading information suggesting that a private entity is authorized to register ships under the flag of a sovereign State.

4.2 Such schemes may involve the creation of websites or electronic platforms designed to replicate the appearance of official government registry offices, thereby misleading shipowners and maritime stakeholders regarding the authenticity of the services offered.

4.3 In certain cases, fraudulent entities may submit documentation to the IMO or other international bodies without the knowledge of the competent flag State authority to obtain ship identification numbers or other official references.

4.4 Additional tactics may include the manipulation of vessel identification information, including the broadcasting of falsified Automatic Identification System (AIS) data designed to misrepresent the identity of a vessel or to simulate the identity of another vessel.

4.5 Another form of irregularity identified in IMO communications concerns situations where vessels continue to fly the flag of a State after the termination or expiry of their registration with that State, thereby creating the appearance of a continuing legal entitlement to that nationality.

5. Communications by Member States to the IMO

5.1 In response to these developments, the IMO has established a mechanism through which Member States may communicate information to the Organization concerning fraudulent registrations or unauthorized registries falsely claiming to represent them.

5.2 These communications are circulated by the IMO Secretariat and made publicly available through the IMO legal affairs framework, thereby allowing maritime stakeholders to identify cases where fraudulent activities have been reported by the affected States.

5.3 The publication of such communications serves both an informational and a preventive function by alerting shipowners, classification societies, port State control authorities, and other stakeholders to the existence of unauthorized registration schemes.

5.4 Through this process, the IMO facilitates transparency and promotes international cooperation in addressing practices that may undermine the integrity of the global ship registration system.

6. Implications for the International Maritime Regulatory System

6.1 Fraudulent ship registration practices raise significant concerns in relation to maritime safety, environmental protection, security, and the protection of seafarers' rights.

6.2 The attribution of nationality to ships is the legal basis upon which a flag State exercises jurisdiction and control over vessels flying its flag and ensures compliance with applicable international conventions.

6.3 When ships operate under a purported registration that has not been granted by the competent authority of the flag State concerned, the chain of regulatory oversight established under the international maritime framework may be compromised.



6.4 Consequently, the IMO has emphasized the importance of maintaining the credibility and integrity of national ship registries and ensuring that ship registration activities are carried out exclusively under the authority of the competent governmental institutions.

7. Concluding Observations

7.1 The work undertaken within the IMO framework reflects a growing international awareness of the risks posed by fraudulent ship registration practices and unauthorized registry operations.

7.2 The continued exchange of information between Member States and the IMO Secretariat remains a key element in identifying such practices and protecting the reliability of the international maritime registration system.

7.3 Stakeholders in the maritime sector are encouraged to verify the authenticity of ship registration authorities and to rely exclusively on officially designated registry administrations when seeking the registration of vessels.

7.4 The G-B ISR will continue to monitor developments within the IMO Legal Committee concerning this matter and will issue further guidance where relevant to ensure transparency, legal certainty, and the protection of the integrity of the flag State system.

For the Guinea-Bissau International Ships Registry

Authorized Signatory:

Office of the General Ships Registrar

