

Sanctions Evasion Networks: Evidence from Maritime Ship-to-Ship Transfers

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ABSTRACT

This paper examines sanctions evasion networks. Drawing on original data and 52 expert interviews, we find that existing policy frameworks underestimate systemic risk and overestimate institutional capacity. Critics argue that the current approach treats symptoms rather than causes. In interviews with more than two dozen practitioners, a recurring theme emerged: coordination between agencies remains weak, and information is still shared on a case-by-case basis rather than systematically. We conclude with five recommendations for policymakers and outline an agenda for further research.

1. INTRODUCTION

History offers some guidance, though not much comfort. Previous episodes of this kind were resolved only after a combination of sustained external pressure and a shift in domestic incentives - conditions that do not yet appear to be in place. The economic stakes are considerable. Conservative estimates suggest that disruption on this scale could shave between 0.3 and 0.7 percentage points off regional growth next year, with the heaviest burden falling on import-dependent economies and low-income households.

2. METHODOLOGY

Technology is both part of the problem and part of the solution. The same digital tools that enable faster coordination also create new vulnerabilities, from data leaks to targeted disinformation campaigns that exploit existing social divisions.

3. FINDINGS

Local communities, meanwhile, are adapting in ways that rarely make headlines. Municipal authorities, civil-society groups and private firms have developed informal networks that in some cases respond faster than national institutions. The legal framework has struggled to keep pace. Existing rules were designed for a different era and leave significant grey areas, particularly where state and non-state actors operate in the same space or where activity crosses multiple jurisdictions.

4. POLICY RECOMMENDATIONS

None of this means that a negative outcome is inevitable. But it does suggest that the window for preventive action is narrowing, and that decisions taken in the next six to twelve months will shape the landscape for much of the coming decade.

5. CONCLUSION

Ultimately, the question is not whether the system will be tested again, but how prepared it will be when that happens. On current evidence, the answer is: better than before, but not yet good enough.