



THE PILLAGE OF UKRAINIAN
AGRICULTURAL ASSETS:
THE ROLE OF A RUSSIAN-ORGANIZED
FLEET OF VESSELS (THE “RUSSIAN GRAY
GRAIN FLEET”) IN EXPORTING PILLAGED
GRAIN FROM OCCUPIED UKRAINE TO
THIRD COUNTRIES



A series of briefs with a regional perspective based on PEJ open source and field investigations

May, 2025

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1. INTRODUCTION

From the beginning of the Russian Federation's full-scale invasion of Ukraine in February 2022, information about Russia's pillage of Ukrainian agricultural products and occupation of farms and other agribusinesses began to emerge.¹ Failing to take Kyiv in April 2022, Russia successfully occupied most of the territory of 4 oblasts² – Kherson, Zaporizhzhia, Donetsk, and Luhansk³ – in addition to Crimea, which had been occupied since 2014. During the early days of the occupation, Russian armed forces and paramilitary groups⁴ inspected and, in several incidents, took over agricultural facilities, including those storing grain, vehicles, and valuable equipment.⁵ Logistical hubs located in Crimean ports, specifically Sevastopol, Feodosia, and Kerch, have played a crucial role in such pillage schemes.

Through these ports, Russia exported pillaged grain to third countries through a well-organized fleet of 56 vessels (referred to in this report as “the Russian Gray Grain Fleet”). The Russian Gray Grain Fleet uses Crimea as a logistical “gray hub” and hides its movements, ultimately funding Russia’s “occupation economy.” The vessels routinely use covert methods to hide their activities, such as through deactivating the Automatic Identification Systems (AIS), and conducting cabotage and transshipment practices to conceal the movements of their vessels.

The findings and analysis presented in this report, read in conjunction with what happened in each oblast, are essential to understand the full scope of the Russian policy to exploit and destabilize Ukraine, for financial profit. The report further outlines how both international and Ukrainian law could establish individual criminal responsibility for those with effective control over the companies and vessels involved in the supply chain, and identifies how these individuals and entities could be designated for sanctions in various jurisdictions, including the United States, the European Union, and the United Kingdom. This report therefore complements other PEJ reports to present the full picture of the impact, harm, and damage of the appropriation and export of grain in occupied territories of Ukraine.

PEJ technical support projects in Ukraine

Since early 2022, Project Expedite Justice (PEJ) has supported small-scale agrarian farmers and larger entities in Ukraine by documenting international crimes and harms (e.g., attacks against the civilian population,

destruction of civilian property and infrastructure, pillaging of resources, improper mining, destruction of the environment, sanctions violations, etc.) and facilitating their access to accountability mechanisms. This includes analyzing the crimes committed throughout the country based on direct investigative activities such as Human Intelligence (HumInt), Open-Source Intelligence (OSINT), documentary evidence, and satellite imagery to support and inform prosecutorial efforts and the imposition of sanctions.

Mapping of Russian pillage and export patterns in Ukraine

This report provides a comprehensive overview of the export of Ukrainian grain through ports in Crimea, highlighting the Russian export companies and vessels comprising the Russian Gray Grain Fleet that are essential to these operations. The report complements and builds on PEJ's series of reports detailing the timeline and *modus operandi* of the Russian policy of pillage in the temporarily occupied territories (TOT) of Ukraine, specifically in Kherson, Zaporizhzhia, Luhansk, Mykolaiv, and Kharkiv Oblasts.⁶ While Russia *de facto* took over parts of Luhansk and Donetsk Oblasts in 2014, it officially, unilaterally, and illegally annexed them, along with Kherson and Zaporizhzhia Oblasts, on September 30, 2022, through treaties signed with their pro-Russian leaders. These were followed on October 4, 2022, by federal constitutional laws on accession signed by Russian President Vladimir Putin. All reports conclude with a preliminary legal analysis that may serve as the basis for launching criminal investigations into the conduct of responsible government and corporate officials.

While that series of reports details the initial acts of pillage in occupied territories of Ukraine, this report demonstrates what follows after those initial acts. It shows how Russia continues to exploit Ukraine's agrarian communities by utilizing the logistics infrastructure in Crimea for export of pillaged grain to third countries. Based on investigations carried out between March 2022 and December 2024, the report reveals how Russia takes Ukrainian-origin grain and uses Crimean ports to export it through cabotage and transshipment activities in the Kerch Strait. These findings ultimately establish how Russia profits from these exploitative operations, and the role the Russian Gray Grain Fleet, and those managing and directing its operations, play in funding Russia's "occupation economy" in the occupied territories of Ukraine and contributing to the severe ongoing destabilization of Ukraine.

Legal standards

This report applies the “reasonable suspicion” standard, establishing its findings on “a reliable body of material consistent with other verified circumstances tending to show that an incident or event did happen.”⁷ As described above, PEJ’s series of reports establishes the Russian occupying authorities’ systematic pillaging of grain throughout the occupied areas of Ukraine; this report details its transport to Crimean ports and export to third countries. In the absence of physical inspections on port premises and unfettered access to Russian documentary evidence, it is not possible to demonstrate that specific transported and exported cargo contains the exact same grain that was pillaged. This report therefore relies on robust evidence that supports the existence of a logistical supply chain to find with reasonable suspicion that the identified export companies and vessels are transporting grain that Russian occupying authorities have pillaged in the TOT. Further investigation will be necessary to demonstrate this conclusion to satisfy higher standards of proof required for criminal liability. Thus, references to “pillaged grain” throughout this report refer to grain that is reasonably suspected of having been pillaged.

Support to Ukrainian prosecutorial authorities

PEJ supports the criminal investigations carried out by the Prosecutor’s Office of the Autonomous Republic of Crimea and the City of Sevastopol (PARC) and the Prosecutor General’s Office of Ukraine (PGO) pertaining to the Russian Federation’s use of Crimea as a logistical “gray hub”⁸ for the further export and sale of pillaged goods and products. PEJ has already provided the PARC and PGO with factual and legal findings on the activities connected to the prohibited entrance of several Russian vessels to Crimean ports, including Fedor,⁹ USKO MFU,¹⁰ San Cosmas, Gam Express, and San Damian.¹¹ Additionally, PEJ has shared satellite images of the vessels located in the Crimean ports, including Nenashev, Ant, Altarf, Alfa M, Navashino, San Cosmas, and San Damian.¹² This support has already resulted in the seizure of USKO MFU.¹³

Summary of findings

The following summarizes this report’s **comprehensive findings on the Russian Gray Grain Fleet’s operations, including the volume, vessels, ports, routes, and actors involved in exporting Ukrainian grain through ports in Crimea, specifically highlighting the activities of Russian companies Pallada and Kuban-Forward.** These findings are based on PEJ’s investigations, which demonstrate the well-organized and well-executed export of pillaged grain by a Russian-organized fleet of 56 vessels to third countries for high levels of profit.

Volume

Russian President Vladimir Putin declared that Russia harvested 146 million metric tonnes of grain in 2023, noting that **5-6 million metric tonnes were produced on the recently annexed territories of Ukraine**.¹⁴ However, Russia's official export statistics, including those concerning the occupied territories, are not fully disclosed.¹⁵ NASA Harvest, a global consortium of agriculture and remote sensing experts that deliver "critical agriculture assessments,"¹⁶ assessed the harvest in the occupied areas of Ukraine at **6 million metric tonnes in 2022** and **4.36 million metric tonnes in 2023**.¹⁷

In the framework of this investigation, PEJ has identified the documented export of at least **1,888,290 metric tonnes** of Ukrainian grain from Crimean ports. When combined with other factual evidence, the total amount of exported grain reaches around **2,500,000 metric tonnes**.

Vessels

PEJ has monitored the activities of vessels operating in the Black Sea region and involved in the illegal transportation of grain and other agricultural products from ports in Crimea, Berdiansk, and Mariupol. Since 2022, **PEJ has identified 56 vessels** (see Appendix 2) involved in the loading and export of pillaged Ukrainian-origin grain while sailing under the Russian and other flags. Based on extensive evidence presented in this report, PEJ has found that these vessels operate as part of a Russian-organized fleet of vessels, which is referred to as the "Russian Gray Grain Fleet," pertaining to the Russian Federation's use of Crimea as a logistical "gray hub" and the identified patterns of hiding the movements of the vessels at sea, ultimately funding Russia's "occupation economy." The vessels routinely use covert methods to hide their activities, such as through deactivating the Automatic Identification Systems (AIS), and conducting cabotage and transshipment practices to conceal the movements of their vessels.

Ports and routes

PEJ has established that at least **2,810,000 out of 8,722,000 metric tonnes** of Ukrainian agricultural products harvested in occupied areas of Ukraine were transported to Crimean ports and logistical hubs. Sevastopol, the Aval terminal, and the port of Feodosia in particular have played important roles in Russia's direct export of Ukrainian agricultural products from Crimea to third countries. For instance, Sevastopol port serves as a key deep-sea port for Russia's export operations; its capacity

allows more vessels to dock there, especially as Russia faces overcrowding at its other deep-sea port in Novorossiysk. Russia's reliance on Crimean ports suggests that the vast majority of agricultural products being shipped from them are harvested and produced in Ukraine, as it is often economically impractical to ship Russian-origin grain through these ports.

Russia's export of Ukrainian-origin grain through Crimean ports requires cabotage and transshipment activities in the Kerch Strait, both of which are critical elements of Russia's operations. The majority of grain transported from recently annexed territories has been directed to the Kerch port,¹⁸ with only a few incidents of direct export shipments from Kerch to third countries.¹⁹

Importers and exporters

The **major destinations** of pillaged grain are ports in **Syria** (e.g., Latakia and Tartous), **Turkey** (e.g., Iskenderun, Samsun, Izmir, and Karasu), and Russia (e.g., Kavkaz). This list is not exhaustive, as some vessels make occasional routes to other ports (e.g., in Lebanon, Iran,²⁰ Yemen,²¹ Venezuela, and Libya²²).

At the center of transporting pillaged grain from Ukraine's occupied territories are 2 Russian companies: **PALLADA** and **KUBAN-FORWARD**. While these are not the only ones, they are examined in more detail in this report due to their predominant roles in the Russian Gray Grain Fleet.

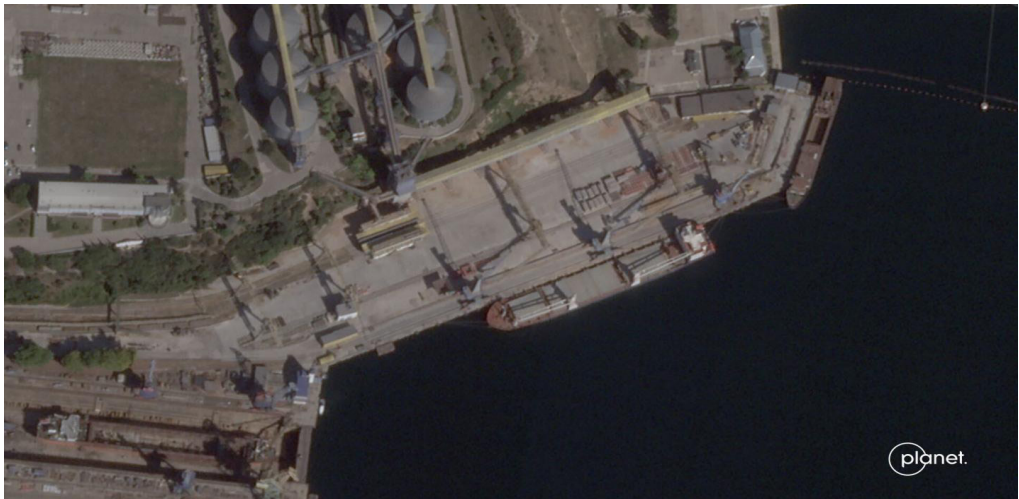
The factual findings will be examined further in Part 2 of this report, which presents detailed evidence and analysis of the Russian Gray Grain Fleet's export of pillaged Ukrainian-origin grain. Part 3 provides a legal analysis examining how various actors might be liable for war crimes or subject to sanctions designations based on the factual findings. Part 4 sets forth PEJ's conclusions and recommendations for how different institutions should utilize the report to conduct further investigations and hold relevant actors accountable.

2. FACTUAL FINDINGS ON THE VOLUME, VESSELS, PORTS, ROUTES, AND ACTORS INVOLVED IN EXPORT OPERATIONS OF UKRAINIAN GRAIN THROUGH CRIMEAN PORTS

2.1 Russian-organized vessels export grain pillaged from the occupied districts of Kherson and Zaporizhzhia Oblasts southward

2.1.1 Origin of pillaged grain

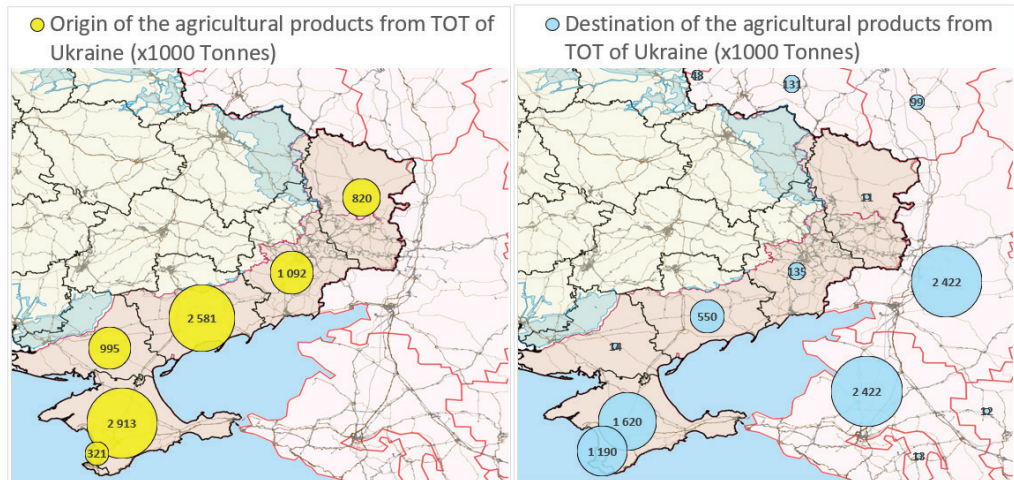
Since the occupation of new territories in Zaporizhzhia²³ and Kherson²⁴ Oblasts, Moscow has implemented policies to seize Ukrainian agricultural companies and pillage their grain for further distribution and profit abroad. Russian occupying authorities have exported this pillaged grain by using proxy companies²⁵ or state unitary enterprises²⁶ as wholesale operators in the newly occupied territories. These operators have been involved in transporting the grain to Crimea for further export through ports in Sevastopol, Feodosia, or Kerch.²⁷



Grain loaded onto the SAN COSMAS vessel in the occupied Sevastopol's Aval Grain Terminal on August 27, 2023. Satellite image retrieved by Yörük Işık.

Quarantine certificates originating from the occupied territories of Zaporizhzhia, Kherson, and Luhansk Oblasts and Crimea confirm that, since July 2023, the total volume of transported agricultural products harvested or taken from these areas, mainly wheat and barley,²⁸ and

moved to Crimean agricultural infrastructure amounts to at least **2,810,000 metric tonnes**.²⁹ The certificates further confirm that there are 4 key logistical hubs for the transportation of pillaged grain: Kerch, Sevastopol, Feodosia, and Krasnogvardesky.³⁰



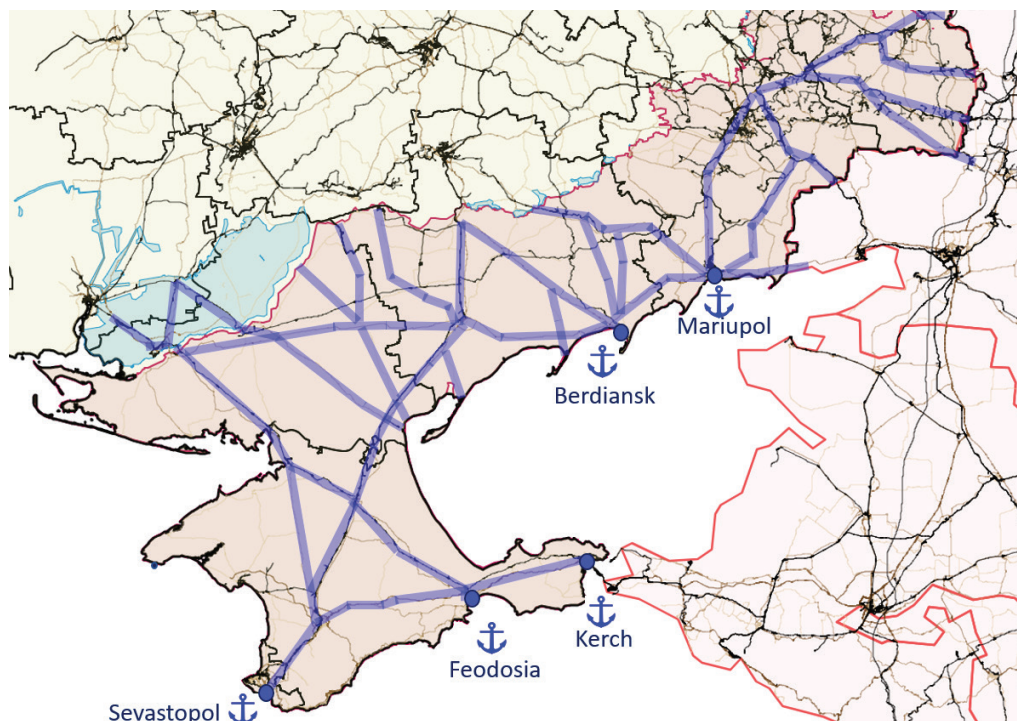
Origin and corresponding destination of pillaged agricultural products from the temporarily occupied territories of Ukraine (TOT) based on the analysis of 239,171 quarantine certificates.³¹

2.1.2 Routes followed to transport pillaged grain from occupied Ukrainian territories to Crimean ports

After Russian occupying authorities and companies pillage grain from the occupied territories of Ukraine,³² it is transported to Crimean ports for export operations through 2 primary routes. Pillaged grain is either transported directly to Crimean ports, or to designated transshipment facilities along the way. Infrastructure along the routes to Crimea, including railroad and road connections, and storage and transshipment facilities, allow for a high volume of agricultural products to be stored and transported for export. The majority of pillaged grain reaches Kerch port, from where vessels in the Russian Gray Grain Fleet directly export the grain abroad or mix and transship it with Russian grain, making it difficult to trace the origin of the product.³³

PEJ monitors and analyzes significant data on specific companies and vehicles, including grain railway hoppers and grain trucks, employed to

transport pillaged grain from the occupied territories to Crimean ports. These entities have been the subject of PEJ's submissions to various authorities, recommending the opening of criminal investigations and the designation of relevant entities for sanctions. The table below displays the primary routes these entities follow to transport pillaged grain from the occupied territories to Crimean ports.



Approximation of logistical routes for the agricultural cargo originating in southern occupied regions of Ukraine based on PEJ's open-source investigations.

2.1.3 Ports under Russian control receive and export pillaged grain

Once pillaged, grain originating in the TOT of Ukraine is transported primarily to Crimean ports under Russian control for export to third countries through the Russian Gray Grain Fleet. Despite a few recorded incidents of grain being exported from ports in Mariupol (Donetsk Oblast) and Berdiansk (Zaporizhzhia Oblast),³⁴ it is unclear how actively

these ports are used by the Russian occupying authorities and whether such information will be included in Russia's quarantine or phytosanitary system. It is possible that the occupying authorities have established a specific documentary procedure for these 2 ports that is not yet available to the public.

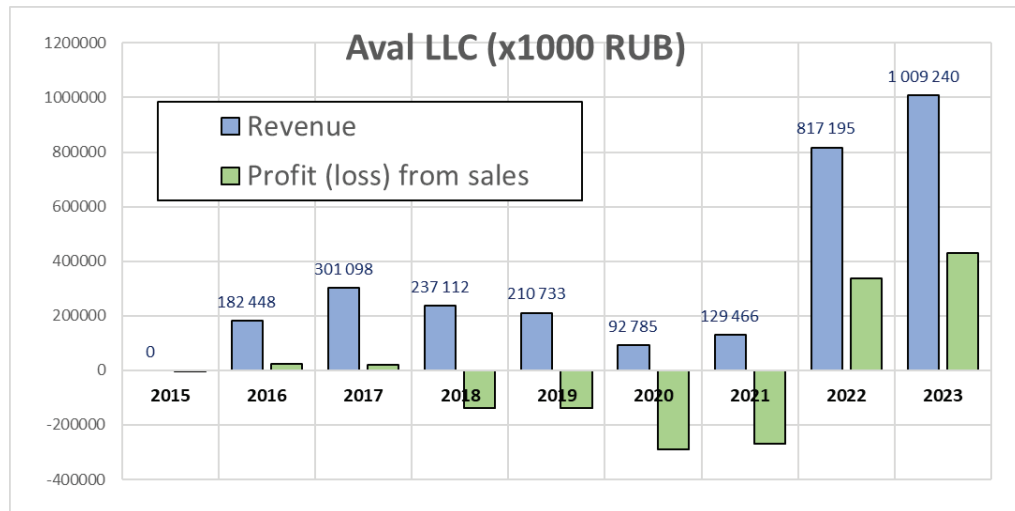
There is more extensive documentary evidence of incidents of grain exported from Crimean ports, primarily using the Russian Gray Grain Fleet. PEJ's preliminary analysis of quarantine and phytosanitary certificates uncovers patterns of Russian occupying authorities and companies organizing transportation of grain from the occupied territories of Kherson and Zaporizhzhia Oblasts and other occupied regions to Crimean ports. The analysis indicates that all of this grain originated from the occupied territories of Ukraine, with at least **2,810,000 metric tonnes** shipped from these ports by vessels in the Russian Gray Grain Fleet between July 2023 and December 2024.³⁵ First, this approach is logistically advantageous due to the shorter logistical route. Second, it would be economically impractical to export grain of Russian origin, such as that harvested in Krasnodar, through Sevastopol, Kerch, or Feodosia.³⁶ Third, 5,912,000 metric tonnes of Ukrainian grain of the 8,722,000 harvested in occupied territories of Ukraine were transported to mainland Russia (primarily to Krasnodar and Rostov).³⁷



Satellite imagery of grain being loaded onto the SAN COSMAS, GAM

EXPRESS, and NOVOCHERKASSK vessels at the Crimean port of Feodosia on December 28, 2023. Satellite image retrieved by Yörük Işık.

Sevastopol is the main Crimean port receiving and exporting Ukrainian-origin grain, through its Aval grain terminal in the Black Sea (formerly named “Avlita” when it was under Ukrainian control),³⁸ with the 2 others being Kerch and Feodosia. In the 2021-2022 market year, Russia exported 41.3 million metric tonnes of grain. This export volume increased to 59.4 million metric tonnes in the 2022-2023 market year, and further to 86.5 million metric tonnes in the 2023-2024 market year. The grain was exported primarily through the Azov and Black Sea ports, which accounted for approximately 90% of all Russian maritime grain exports.³⁹ This surge in shipments has placed considerable strain on the region’s road and rail transport networks and is one reason for Russia’s reliance on ports in occupied Ukraine. PEJ established that Russia exported at least **2,500,000 metric tonnes** of grain from Aval and the 2 other Crimean ports of Kerch and Feodosia during the 2023-2024 market year. The following chart shows the increase in Aval’s income after the full scale invasion of Ukraine, which demonstrates the economic viability for Russia of exporting pillaged grain through these ports.⁴⁰



Aval's income since Russia's full-scale invasion of Ukraine, illustrating the drastic increase in profits gained from shipments of pillaged grain.

Exports from Crimean ports continued even in the face of prohibitions under EU⁴¹ and US⁴² sanctions regimes and Ukrainian legislation.⁴³ In

2014, Ukraine officially closed Crimean seaports for international shipping, making every subsequent export from Crimea unlawful.⁴⁴ Yet between March 2022 and December 2024, PEJ documented an increasing volume of product passing through Crimean ports, particularly by vessels in the Russian Gray Grain Fleet, likely due to an increase in grain transshipment. Other contributors to this increase in volume likely include the transportation of military cargo, supplies for the Russian Armed Forces, damaged equipment, and pillaged Ukrainian property.⁴⁵

PEJ's analysis of quarantine certificates demonstrates that Russian occupying authorities and companies are moving Ukrainian-origin grain both to Crimea and directly to Russia. Many Russian ports, like Azov and Rostov, do not have the deep-water capacity of Crimean ports, such as Sevastopol, to handle large-tonnage vessels, which increases the cost per tonne of transportation.⁴⁶ One (1) Russian deep-water port, Novorossiysk port, handles nearly half of all Russian agricultural exports, effectively operating at full capacity. However, Novorossiysk port is expensive for transshipment, which limits its physical capacity to process cargo. The Caucasus port has developed as an alternative, as a less expensive option that can handle large vessels transporting grain. Even so, at least 3.3% of Russian seaborne grain exports depart directly from Crimea.⁴⁷

PEJ's analysis demonstrates that Crimean ports are being used as key logistical hubs for the transportation of pillaged agricultural products from occupied territories of Ukraine. While documented evidence from July 2023 to December 2024 confirms that these operations involve about **2,500,000 metric tonnes** of wheat and other grains, it is probable that the actual amount is 2 to 3 times higher, given that PEJ relies only on published certificates.

2.2 An intricate web of Russian companies involved in the illicit export of Ukrainian-origin grain

2.2.1 How vessels are operating to conceal their movement and illicit activities

The systematic export of pillaged Ukrainian-origin grain through Crimean ports to third countries through the Russian Gray Grain Fleet is achieved by close collaboration between Russian occupying authorities and Russian companies employing covert practices. PEJ's collaboration

with the PARC has uncovered that these companies routinely deactivate the Automatic Identification Systems (AIS), and conduct cabotage and transshipment practices to conceal the movements of their vessels.

Together with the occupying authorities, the companies employ 2 primary methods. The first involves vessels under the Russian flag illegally entering closed ports in Crimea, loading pillaged grain, transporting it to the Russian ports of Caucasus or Novorossiysk, reloading it onto larger vessels, and transporting it to third countries with official Russian documents falsely detailing that the grain originated from Russia. The second involves vessels turning off their AIS tracking system while entering closed Crimean ports, loading grain, leaving the ports, and turning the AIS back on in the nearest Russian port.⁴⁸

The vessels in the Russian Gray Grain Fleet used by the Russian occupying authorities and export companies show a clear pattern of having their AIS turned off, specifically when near Crimean ports. The following table demonstrates this pattern for 8 vessels:

	2022_01	2022_02	2022_03	2022_04	2022_05	2022_06	2022_07	2022_08	2022_09	2022_10	2022_11	2022_12	2023_01	2023_02	2023_03	2023_04	2023_05	2023_06	2023_07	2023_08	2023_09	2023_10	2023_11	2023_12	2024_01	2024_02	2024_03	2024_04	2024_05	2024_06	2024_07	
Fedor	100%	100%	74%	0%	0%	30%	81%	52%	23%	23%	0%	0%	0%	0%	0%	43%	90%	83%	74%	74%	0%	0%	0%	0%	0%	24%	26%	7%	34%	0%	0%	
Gam Express	0%	18%	100%	100%	100%	100%	58%	58%	27%	100%	20%	81%	94%	43%	84%	90%	100%	90%	84%	100%	100%	100%	100%	39%	68%	100%	77%	100%	55%	23%	3%	
Grumant	0%	100%	84%	30%	100%	100%	100%	100%	100%	100%	100%	100%	97%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	90%	100%	94%	86%	65%	50%	26%	53%	13%
San Cosmas	58%	32%	45%	70%	55%	57%	58%	23%	77%	3%	0%	13%	10%	46%	3%	0%	3%	0%	26%	77%	93%	100%	87%	10%	81%	17%	0%	0%	0%	0%	0%	
San Damian	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	0%	29%	46%	26%	70%	26%	30%	0%	0%	43%	77%	100%	65%	0%	0%	0%	0%	0%	0%	0%	
San Severus	0%	0%	19%	90%	90%	70%	29%	32%	27%	65%	20%	3%	39%	86%	61%	33%	58%	67%	87%	32%	0%	19%	53%	68%	42%	66%	77%	60%	68%	50%	94%	
Zafar	0%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	50%	0%	0%	10%	3%	47%	48%	90%	100%	45%	66%	58%	7%	23%	100%	35%	
Zaid	0%	100%	100%	100%	100%	73%	100%	100%	100%	100%	100%	100%	100%	100%	100%	100%	43%	3%	0%	61%	81%	77%	81%	100%	90%	35%	72%	55%	63%	81%	93%	35%

The values at the top of the table represent the percentage of days during the month when the vessel's location was reported. A value of 100% means there was at least 1 record of the vessel's location every day of the month. A value of 50% means the location was reported on only 15 days during the month. A value of 0% indicates that no location records were reported throughout the month.

The activities of 2 Russian-registered export companies, LLC “PALLADA”⁴⁹ and LLC “KUBAN-FORWARD,”⁵⁰ demonstrate how these covert operations are possible. PALLADA and KUBAN-FORWARD control approximately **55% of agricultural export operations** from Crimean ports. Out of approximately **2,500,000 metric tonnes** of agricultural goods exported from Sevastopol, Kerch, and Feodosia, these 2 companies were responsible for the shipment of **1,390,970 metric tonnes** between July 2023 and December 2024.⁵¹ There is a reasonable suspicion they hold a unique and privileged position in the market, and that they have

been granted special permission by the Russian occupying authorities to operate as wholesalers in Crimea. More investigation is needed to validate this theory to meet a higher standard of proof.

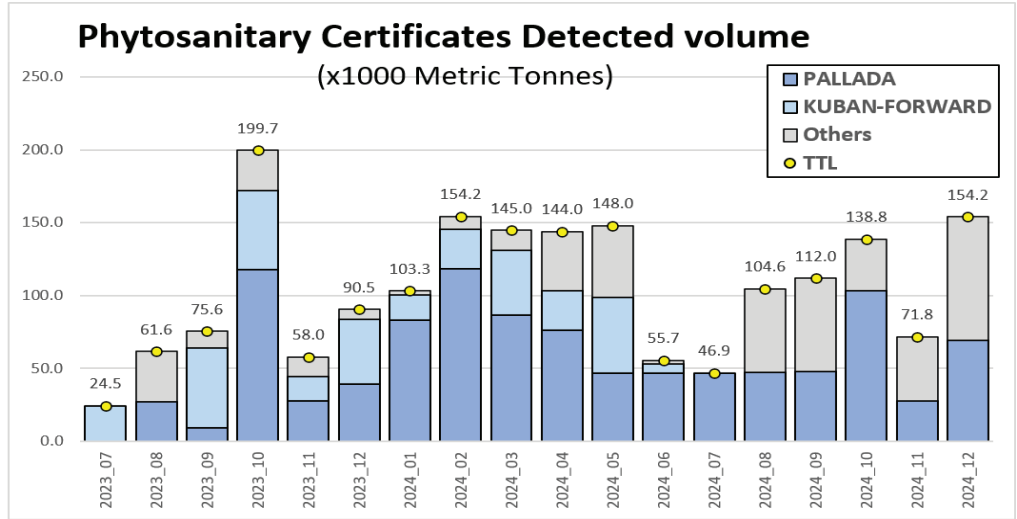
The 2 companies enjoyed significant profits in 2023. **PALLADA**'s approximate revenue was 30 billion RUB (approximately 290 million USD), with a profit increase of 513% from 2022.⁵² **KUBAN-FORWARD**'s revenue was 19 billion RUB (approximately 183 million USD), with a profit increase of almost 800% from 2022.⁵³ This steep increase in profit is exceptional for any type of business, suggesting that such profit might have been achieved through illegal schemes or direct support from Russian state aid.

Both **PALLADA** and **KUBAN-FORWARD** have been suspected of, at the very least, affiliation with illicit activity. **PALLADA** has been active in business for only about 2 years, coinciding with the start of Russia's full-scale aggression against Ukraine. Two (2) years is notably shorter than the average market age of similar companies, which have typically operated for at least 7 years.⁵⁴ On multiple occasions, journalists have identified **PALLADA** as conducting illegal corporate activities,⁵⁵ reporting the company's potential links to individuals associated with President Vladimir Putin⁵⁶ and to companies being investigated for corruption, fraud, and money laundering.⁵⁷ **KUBAN-FORWARD** has been suspected of similar affiliations, including with a Ukrainian MP and Russian sympathizer, and a grain-trading conglomerate.⁵⁸ To date, there have been no publicly-known investigations into the owners and officials of these companies, and they have not been designated for sanctions.⁵⁹

Evidence suggests these companies use their wealth of resources and support from the occupying authorities to bypass reporting and monitoring systems to conceal detection of export operations. For example, PEJ has identified what appears to be a fake or nominal company, **MEZZEH**.⁶⁰ By December 2024, **PALLADA** had completed at least 41 documented voyages exporting 1,020,775 metric tonnes of wheat from Crimea primarily to Syria through the Russian Gray Grain Fleet.⁶¹ While **MEZZEH** was listed on the export documentation for each voyage to Syria, the documentation did not indicate its role or the name of the importer. In one (1) case, on September 3, 2023, an importer was indicated for a separate shipment when **PALLADA** exported agricultural products to Iran. On the export documentation for this voyage, the importer was listed as **ZULU TRADING LIMITED LLC**, on behalf of Sestos Offshore

S.A.L.⁶² The frequent failure to list importing companies suggests efforts to conceal detection and bypass reporting and monitoring systems.

These covert efforts are likely made possible with the support of the Russian occupying authorities. Further documentation confirms that **MEZZEH** has imported 1,311,000 metric tonnes of grain (see Appendix 3). **MEZZEH**'s export numbers and those for **PALLADA** and **KUBAN-FORWARD**, together amounting to **1,390,970 metric tonnes**, suggest it is probable that these companies may have exclusive rights or informal permission from Russian occupying authorities to export grain to Syria. Syria's lack of a reporting system,⁶³ lack of international cooperation in legal affairs,⁶⁴ and political friendliness toward Russia in the likely made this dynamic possible.⁶⁵



PALLADA and KUBAN-FORWARD's share in export operations from the TOT of Crimea. Their export operations to Syria accounted for the largest share compared to other importing countries.

2.2.2 Transit routes and final destination countries

PEJ has uncovered a pattern of Russian companies purchasing agricultural products from state grain operators and other entities in the occupied territories of Ukraine, receiving the products at Crimean ports, and exporting them to third countries through vessels in the Russian Gray Grain Fleet employing covert methods. As discussed above, these

transit routes primarily follow from Crimean ports, and in a few cases to the Russian ports of Caucasus or Novorossiysk, and then to third countries. Syria and Turkey import most of these agricultural products, followed by Lebanon, Iran, Yemen, Cyprus, Egypt, Libya, and Venezuela (see Appendix 3).



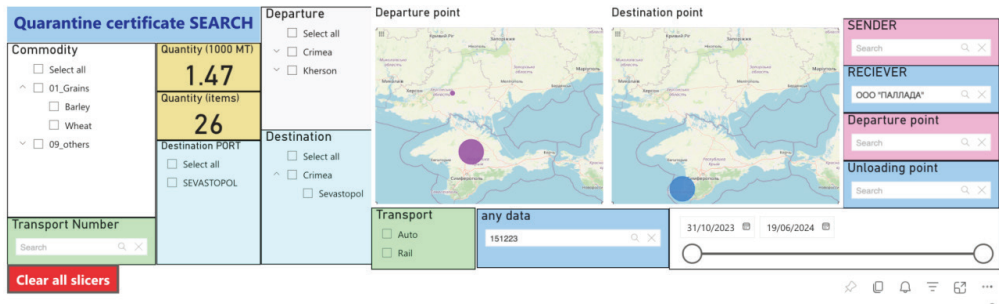
On July 8, 2024, ZAFAR stayed in the port of Saleef, Yemen, after transporting 27,200 metric tonnes of grain from occupied Sevastopol. At the moment this image was captured, the vessel appears half empty. Satellite image retrieved by Yörük Işık.

Documentary evidence suggests that the export operations of **PALLADA** and **KUBAN-FORVARD** have followed this pattern. **PALLADA** has an extensive record of purchasing grain and other cereals from the State Grain Operator and other entities in occupied parts of Zaporizhzhia Oblast with the intention of exporting them for profit.⁶⁶ For example, on December 13, 2023, **PALLADA** received and exported 2,570 metric tonnes of wheat and other cereals through Aval port in Sevastopol, the majority of which was exported to Syria.⁶⁷



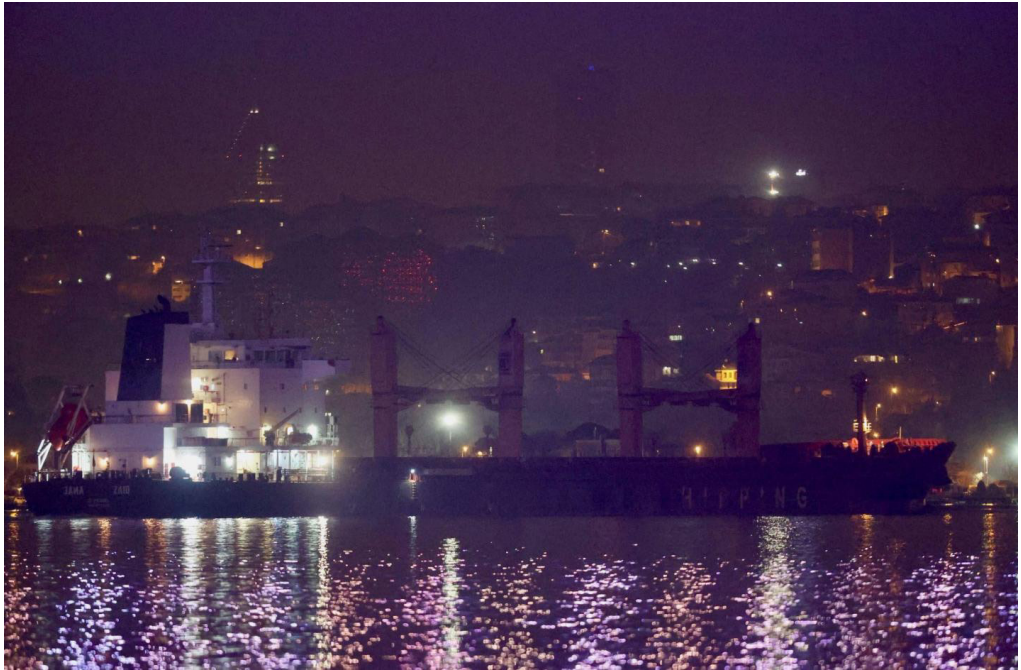
An example of PALLADA's operations, in December 2023, based on available quarantine certificates. This data illustrates that the State Grain Operator (GZO) in Zaporizhzhia Oblast, which has unlawfully seized all Ukrainian grain elevators in the occupied region,⁶⁸ made a shipment to PALLADA.

Between December 15 and 30, 2023, **PALLADA** received approximately 4,000 metric tonnes of grain in Sevastopol for processing and shipment abroad.⁶⁹ A portion of this grain was harvested on the Russian-seized premises of Askaniys'ke Doslidne Hospodarstvo NUAAN DP, located in the village Tavrychanka in Kherson Oblast.⁷⁰ The following month, on January 3, 2024, **PALLADA** exported 35,700 metric tonnes of wheat to Syria, using the vessel **ZAID**.⁷¹ On January 11, 2024, it exported another 35,700 metric tonnes of wheat to Syria using the vessel **ZAFAR**.⁷² By January 21, 2024, these vessels — part of the Russian Gray Grain Fleet — were already docked in the port of Tartus, Syria.⁷³ By December 2024, **PALLADA** had completed at least 37 documented voyages, exporting 888,895 metric tonnes of wheat from Crimea to Syria.



PALLADA's operations on December 15, 2023, based on available quarantine certificates. This data illustrates that the shipments received by PALLADA on this day were intended for export rather than local consumption, as the shipments were directed to ports supplying third-country destinations.

KUBAN-FORWARD, as the second-largest exporter from Crimea, also has an extensive record of trading with seized Ukrainian enterprises in the occupied territories, such as LLC "PKF" MELITOPOLSKAYA CHERESHNYA ("MELITOPOL CHERRIES").⁷⁴ On September 29, 2022, the PGO notified several individuals from the State Grain Operator that they were suspected of "supplying stolen Ukrainian harvests to the aggressor state."⁷⁵ The pre-trial investigation revealed that the State Grain Operator confiscated grain on the occupied territories of Ukraine, and transported it to **KUBAN-FORWARD**.⁷⁶ Undeterred, **KUBAN-FORWARD** continued its operations. On January 12, 2023, the company received 70 metric tonnes of wheat from **MELITOPOL CHERRIES**, to be exported from Sevastopol.⁷⁷ In total, between March 2022 and December 2024, **KUBAN-FORWARD** exported 345,694 metric tonnes of wheat, primarily to Syria.⁷⁸



On January 31, 2025, the Russian vessel Zaid transported 35,000 metric tonnes of pillaged wheat from occupied Sevastopol to Alexandria, Egypt, through the Bosphorus Strait. This grain was loaded onto the vessel at Crimea's Aval port on January 26, 2025. Photo credit: Yörük Işık.

2.2.3 The convergence of export operations of 2 main actors: PALLADA and KUBAN-FORWARD

PALLADA and **KUBAN-FORWARD** engage in similar export activities, with similar transit and export routes; the evidence suggests that their operations are more closely linked through a Russian-organized and controlled web of companies and vessels. According to data leaks from FGIS “Zerno,” a federal state registry that traces grain products,⁷⁹ KibOrg News disclosed that B-Agro, a private enterprise involved in the seizure of Ukrainian agricultural companies and the pillage of Ukrainian agricultural products in Kherson Oblast,⁸⁰ has extensive trade links with both **KUBAN-FORWARD** and **PALLADA**. The grain from the seized companies is transported to **KUBAN-FORWARD** and **PALLADA** in Sevastopol.⁸¹ The following section details how these companies, in partnership with the Russian occupying authorities, have utilized the same fleet of vessels (i.e., the Russian Gray Grain Fleet) to export Ukrainian-origin grain from Crimean ports.

2.3 The vessels involved in the export operations of Ukrainian-origin grain constitute a de facto Russian-organized fleet undermining Ukraine's economy

2.3.1 Links between vessels and export companies

To facilitate the illegal activities of export companies from Crimean ports, Russia has organized a system of trade vessels to provide transportation services for the export of pillaged grain. As of December 2024, PEJ identified **56 vessels** operating in the Black Sea region, each seen at least once in Crimean ports, frequently employing various covert methods to hide their movements. Together, these vessels constitute what PEJ refers to as the Russian Gray Grain Fleet, because: (1) the operations are Russian-organized; (2) they employ covert operating methodologies; (3) they are involved in exporting pillaged grain; and (4) while not under centralized command *per se*, the 56 vessels systematically use the same transport and export routes involving the same companies.

Russia controls these export operations through State Unitary Enterprises, which operate as wholesale traders of agricultural products, transferring profits to the State coffers.⁸² The Russian occupying authorities require export companies to obtain special permits to export certain agricultural products through trade vessels.⁸³ Obtaining such permits requires the companies to be Russian-registered and to register with FGIS “Zerno,” a federal state registry that traces grain products.⁸⁴ Russia has allowed a limited number of enterprises to issue and receive export permits.⁸⁵ Documentary evidence supports the finding that **PALLADA** and **KUBAN-FORWARD** are among those permitted to carry out export operations, playing key roles in exporting pillaged agricultural products from Crimean ports, primarily to Syria, through the use of various vessels, or bulkers.⁸⁶

It is challenging to take legal measures to address the operations of the Russian Gray Grain Fleet because of its decentralized nature. While **PALLADA** and **KUBAN-FORWARD** lead the export process as a whole, the vessels themselves are owned and managed by different entities. For example, both **PALLADA** and **KUBAN-FORWARD** have utilized the services of vessels such as **SAN SEVERUS**, **SAN COSMAS**, and **SAN DAMIAN**, which operate under covert management and frequently change their registration status, presumably to hide their identity and obfuscate any paper trails.



Grain was loaded onto SAN SEVERUS in occupied Sevastopol on August 6, 2024. The vessel transported the grain shipment to Syria via the Bosphorus Strait. Photo credit: Yörük Işık.

These 3 vessels — which were sanctioned by the US Department of the Treasury on August 3, 2015, for carrying cargo from Russian-occupied Crimea to Syria⁸⁷ — previously operated under the Syrian Government’s General Authority for Maritime Transport (**SYRIAMAR**). In November 2023, the vessels were registered under the flag of Eswatini, formerly Swaziland, hiding the absence of legitimate registration.⁸⁸ The landlocked Eswatini has joined the growing list of countries establishing shipping registers and offering its flag to sanctioned ships. Eswatini Maritime Affairs and Development (EMAD), a private company established through government agreement,⁸⁹ registered with Eswatini’s Ministry of Commerce in November 2023 and proceeded to register a total of 10 cargo-carrying ships under the Eswatini flag. The UN International Maritime Organization does not recognize the authority of a private company to issue flags, and has designated these operations as fraudulent.⁹⁰ The Government of Eswatini has conceded that its register was unlawfully established and is in the process of removing its flag from vessels operating internationally.⁹¹

Like other members of the Russian Gray Grain Fleet, these former **SYRIAMAR** vessels have recently undergone a series of name, flag, and ownership changes, all of which conceal their actual ownership, registration status, and activities. The current owners of **SAN SEVERUS**, **SAN COSMAS**, and **SAN DAMIAN** are unknown. In November 2023, Captain A-K Dhiman, the Deputy Director General of EMAD, confirmed that these vessels had been registered under the Eswatini flag but have since been de-registered. Lebanon-based brokers ChartBrok are the agents for the sanctioned vessels and decline to reveal their current ownership or management details.⁹² None of the vessels have yet reflected this reported change, still signaling that they are flagged by Eswatini via AIS data. Despite superficial changes, these vessels engage in the exact same activities as before, at the same ports and destinations. This suggests that the shuffling is in name only, to enable the vessels to operate more freely.



SAN DAMIAN transited the Bosphorus Strait on February 8, 2024, en route to Syria. Photo credit: Yörük Işık.

PARC closely follows this suspicious activity.⁹³ In April 2024, PARC served notices of suspicion on the occupying administration's so-called Minister

of Agriculture of the Republic of Crimea, the Director of the company that owns the vessels, and 16 captains of the Russian Gray Grain Fleet's vessels. As part of its investigations, PARC has identified 22 vessels of interest, of which 19 have been arrested (seized) pursuant to a Ukrainian court order.⁹⁴

2.3.2 Volumes of agricultural products exported

Each vessel in the Russian Gray Grain Fleet has a different cargo capacity, purpose, and primary use, as seen in the infographics below. A vessel's maximum weight capacity is usually measured in Deadweight Tonnage (DWT), which includes the volume of the vessel's cargo, fuel, passengers, crew, provisions, and freshwater. As a result, the maximum cargo capacity can change. Phytosanitary certificates confirm that the vessels of the Russian Gray Grain Fleet are usually filled with cargo at full capacity. For example, **ZAID**, which is a handymax bulker with a maximum cargo capacity of about 35,666 metric tonnes, was loaded on March 24, 2024, with 35,800 metric tonnes of wheat; on February 19, 2024, with 35,700 metric tonnes of wheat; and on January 3, 2024, with 35,700 metric tonnes of wheat. This ratio of capacity to fullness is common for all Russian Gray Grain Fleet vessels.⁹⁵

PEJ has conducted in-depth examinations of the activities of 8 vessels of the Russian Gray Grain Fleet based on documentary and factual evidence collected between March 2022 and December 2024: **ZAID**, **ZAFAR**, **GRUMANT**, **SAN SEVERUS**, **SAN COSMAS**, **SAN DAMIAN**, **FEDOR**, and **GAM EXPRESS**. The following infographics detail these activities, including the volume of agricultural products they transported during this period.

Gray Grain Fleet

EXPORTING PILLAGED GRAIN FROM OCCUPIED UKRAINE TO THIRD COUNTRIES

The Gray Grain Fleet is composed of at least 56 vessels sailing under the Russian and other flags. Between March 2022 and December 2024, these vessels exported at least 2,500,000 metric tonnes of grain through Crimean ports to Syria, Turkey, Yemen, and other countries. These export operations ultimately benefit Russia's "occupation economy" by exploiting Ukraine's agricultural resources, destabilizing Ukraine's economy, and amassing enormous profits for Russian-organized entities.



MINI BULK CARRIER

Coastal trade, serving as a feeder vessel to larger ships; Mainly trades on short sea routes, carrying limited quantities of bulk cargoes to smaller ports



HANDYSIZE MEDIUM BULK CARRIER

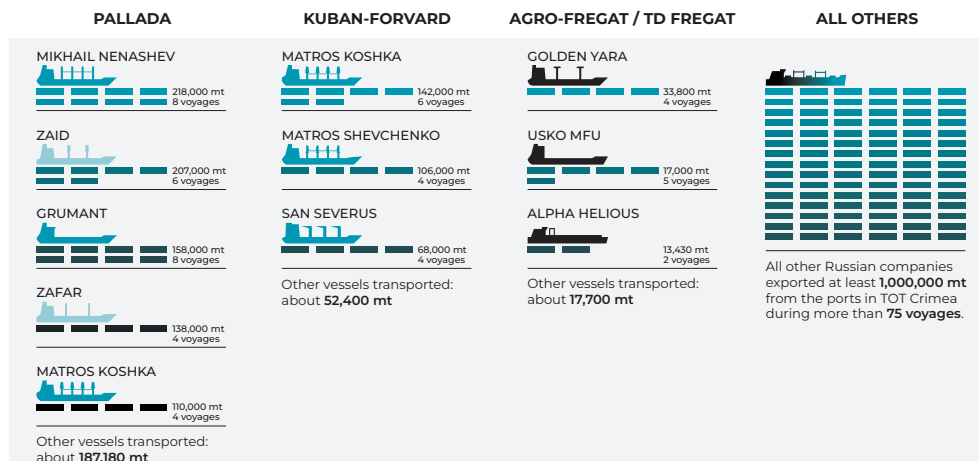
Carries considerable varieties and quantities of bulk cargoes to numerous ports



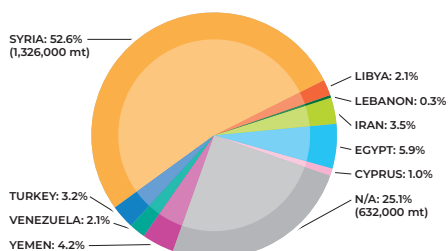
HANDYMAX BULK CARRIER

Well-suited for small ports with length and draught restrictions, or that lack transshipment infrastructure; Used primarily for carrying dry cargo, such as grain

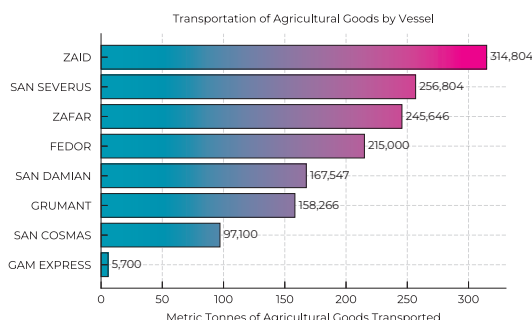
Companies involved in the export of looted agricultural goods



Importers who have received the grain transported from Crimean ports (as of December 2024)



The vessels involved in the transportation of looted Ukrainian grain are under scrutiny



Vessel activities between March 2022 and December 2024.

PEJ has assessed **123 documented incidents**⁹⁶ of the 56 vessels identified as part of the Russian Gray Grain Fleet, and has conducted a detailed screening⁹⁷ of the export operations of the 8 vessels of interest from Crimean ports between March 2022 and December 2024. Through this screening, PEJ established that at least **1,888,290 metric tonnes** were loaded and transported, **1,390,970 metric tonnes** of which were transported by **PALLADA** and **KUBAN-FORWARD**. However, AIS and OSINT data indicate that the actual number of export incidents would be higher than documented (see Appendix 1). PEJ has reviewed this data and determined that the 8 vessels of interest undertook an additional **48 undocumented voyages** between March 2022 and August 2024. As such, at least 118 voyages were conducted from Crimean ports since 2022, with 123 documented and 48 undocumented but confirmed through factual data. The actual number of voyages is likely even higher, as the information summarized from OSINT and AIS pertains only to the 8 vessels of interest displayed in the infographics above. Considering the maximum loading capacity of the vessels, at least **632,400 metric tonnes** of grain was likely exported during the 48 undocumented voyages. Combined with the documented amounts, this totals approximately **2,500,000 metric tonnes** of pillaged Ukrainian grain transported by 8 vessels from Crimean ports between March 2022 and December 2024.



GAM EXPRESS vessel transporting grain to Turkey through the Samsun port, anchorage (41.28652, 36.3816) in January 2024. Photo credit: Yörük Işık.

PEJ has also identified a pattern relating to the volume of Ukrainian-origin

agricultural products exported to specific third countries. After analyzing the export of **2,500,000 metric tonnes** of agricultural products by the Russian Gray Grain Fleet from Crimean ports to third countries, PEJ found that **1,311,000 of these metric tonnes** were exported to Syria. This amounts to approximately half the total amount of grain Russia exported to Syria during the same period. By contrast, Russia's exports of agricultural products from Crimean ports to other destinations, such as Iran, Egypt, and Lebanon, account for less significant volumes of shipments. This reveals a unique pattern of disproportionate export operations from Crimean ports to Syria,⁹⁸ indicating an effort to conceal certain operations and attract less scrutiny. This scheme was likely made possible due to the friendly political relationship between Russia and Syria at the time it was investigated, and Syria's lack of a reporting system then.

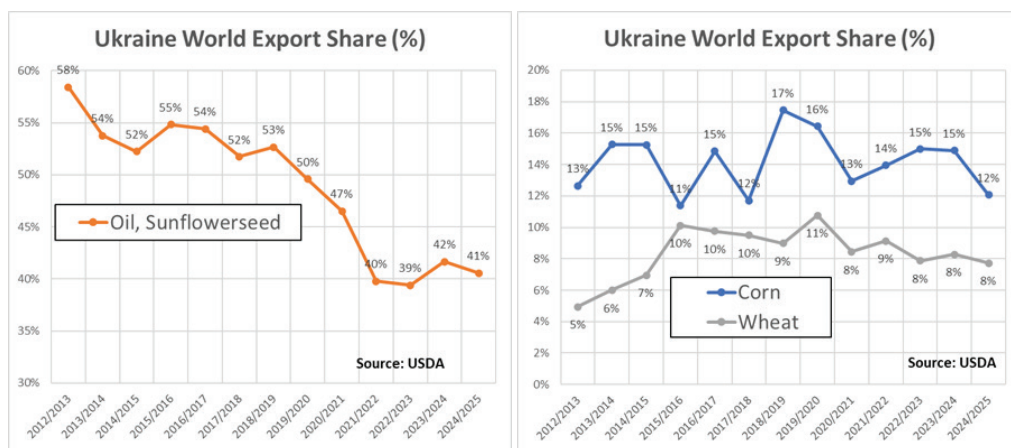


In June 2024, the GRUMANT vessel returned to the Black Sea after delivering pillaged wheat to Syria. The vessel operates under the Russian flag, but otherwise operates like a pirate vessel without a name or IMO identification number displayed on its body. Photo credit: Yörük Işık.

2.3.3 Value and share in the Ukrainian and Russian economies

Russia's exploitation of agricultural resources in the occupied territories of Ukraine and export of these resources through the Russian Gray Grain Fleet has benefited Russia's "occupation economy," destabilized Ukraine's economy, and exacerbated the plight of Ukrainian citizens. This exploitation has ultimately served as a tool to expand the occupying authorities' economic advantage and control in the region.

As a result of the full-scale invasion, the amount of arable Ukrainian land occupied by Russia increased from 4% in 2014 to 17.1% in 2022.⁹⁹ The loss of control over these resources, and the ability to export them freely, has led to a significant reduction of export revenue for Ukraine. Prior to the full-scale invasion, Ukraine's agricultural production during the 2020-2021 market year accounted for approximately 11% of global wheat exports, 13% of global corn exports, and 47% of global sunflower oil exports. These percentages have decreased during the 2024-2025 market year to 8% for wheat, 12% for corn, and 41% for sunflower oil.¹⁰⁰



Ukrainian export share in world trading of sunflower seed oil, corn, and wheat (% of metric tonnes).

Russia's exploitative practices directly impact residents of the occupied parts of the Kherson and Zaporizhzhia Oblasts, for whom agriculture is a primary source of income. Ukrainian agrarians suffer losses, yet, Russia profits. An investigation carried out by the independent Ukrainian media company TEXTY and the agro-technology company OneSoil uncovered that, during the first 2 years of the full-scale invasion, Russia harvested

more than 10 million metric tonnes of wheat pillaged from the occupied territories of Ukraine. This roughly equates to the annual harvest output of an entire country, such as Romania. The vast majority of this harvest is exported for Russian profit.¹⁰¹

According to a joint 2024 study by KSE Agrocenter and the World Bank,¹⁰² Ukraine's agricultural sector has suffered more than \$80 billion in direct damages and indirect losses as a result of the full-scale invasion. These losses continue to increase over time. From February 2023 to December 2023, direct damages increased by 18%, from \$8.7 billion to \$10.3 billion, and indirect losses more than doubled, from \$31.5 billion to \$69.8 billion.¹⁰³

NASA Harvest, a global consortium of agriculture and remote sensing experts that deliver "critical agriculture assessments,"¹⁰⁴ estimates that Ukraine's lost harvests have resulted in approximately \$2 billion in economic losses in 2023.¹⁰⁵ If not for these losses caused by Russia's occupation of Ukrainian territories, NASA Harvest calculated that these crops could have fed more than 25 million people in 1 year.¹⁰⁶

Ukraine's resulting lost revenue has essentially been redirected to Russia. Russian companies' seizure of 150 Ukrainian enterprises in the occupied territories of Ukraine, pillage of these enterprises' assets, and export of these assets through the Russian Gray Grain Fleet has generated significant financial gains for the Russian occupying authorities. In 2023, their net assets amounted to \$91,002,000, their revenue to \$387,083,130, and their net profit to \$15,756,560.¹⁰⁷ This demonstrates the substantial economic gain that Russia has derived from pillaged resources.

3. LEGAL ANALYSIS

There are various legal frameworks through which actors facilitating Russia's export of pillaged Ukrainian-origin grain might be held accountable. This section examines how these actors — specifically **PALLADA, KUBAN-FORWARD**, the vessels they collaborate with through the Russian Gray Grain Fleet, and those with effective control over them — may bear responsibility for war crimes and are ripe for designation under various sanctions regime.

3.1 Potential liability for war crimes

In our series of reports, PEJ has already established the commission of the war crime of pillage in occupied oblasts, including comprehensive timelines and *modus operandi* of the policies of pillage implemented by Russian occupying authorities.¹⁰⁸ While the implementation of these policies across the occupied territories varies,¹⁰⁹ Ukrainian agribusinesses have been common targets of similar practices. The ownership of hundreds of these enterprises has been transferred to private and parastatal Russian companies, in some instances accompanied by admissions of unlawful transfers.¹¹⁰ This report expands on these findings, establishing systematic logistical supply chains through which the occupying authorities transfer the grain pillaged in these occupied territories to Russian-controlled companies, which then transport the grain to Crimean ports, from where Russian-controlled vessels (e.g., the Russian Gray Grain Fleet) export the grain to third countries. Applying the “reasonable suspicion” standard to the facts,¹¹¹ additional investigation is necessary to demonstrate that the grain transported by these entities is actually pillaged to satisfy higher standards of proof required for criminal liability. This subsection sets forth the legal analysis to assess the accountability of the entities identified in this report.

PEJ’s legal analysis begins with the potentially most relevant provisions of **international law** and the **Criminal Code of Ukraine (CCU)**, with an emphasis on the substantive **crime of pillage** and **modes of liability**. The relevant international law principles discussed in this analysis, and that are applicable in Ukraine’s domestic system, are limited to those contained in legal instruments that Ukraine has ratified¹¹² and constitute customary international law.¹¹³ The Rome Statute (RS) of the International Criminal Court is relevant here not only because of Ukraine’s active Article 12(3) declarations, lodged on April 9, 2014,¹¹⁴ and September 8, 2015,¹¹⁵ respectively, but also based on Ukraine’s August 2024 ratification of the Rome Statute, which took effect on January 1, 2025.¹¹⁶ It is important to note that the Verkhovna Rada of Ukraine adopted a law amending certain articles of the CCU to ensure conformity with the Rome Statute, which may affect their application in the context of national investigations.¹¹⁷ For instance, in October 2024, the Verkhovna Rada adopted an amendment introducing “command responsibility,” establishing criminal liability for military and civilian commanders and superiors for, *inter alia*, war crimes committed by a subordinate when enumerated conditions are met.

3.2 Relevant legal provisions

International Humanitarian Law (IHL) provides for the protection and appropriate use of private and public property during hostilities and under occupation. In particular, it restricts the circumstances in which the appropriation of enemy property is permitted under IHL, and prohibits:

- i. the seizure of the enemy's property during hostilities, unless justified by military necessity,¹¹⁸
- ii. the confiscation of private property under occupation,¹¹⁹ and
- iii. pillage during hostilities and under occupation.¹²⁰

International criminal law (ICL) criminalizes breaches of these IHL provisions on illegal appropriation of property as war crimes attracting individual criminal responsibility.¹²¹ Since the ICC has jurisdiction over the Situation in Ukraine,¹²² which has been under investigation since March 2, 2022,¹²³ this analysis is isolated to relevant crimes concerning the appropriation of property specifically within the ICC's jurisdiction.¹²⁴ These provisions are also embedded in Article 438 of the CCU.¹²⁵

Article 8 of the RS criminalizes both pillage and seizure of the enemy's property as war crimes, regardless of the private or public nature of the property, and in the context of and associated with both non-international and international armed conflicts, including military occupation. The following table details the elements of these war crimes.

<p>The <i>Elements of Crimes</i> provide that the following establish the war crime of pillage:</p> <ol style="list-style-type: none"> 1. The perpetrator appropriated certain property. 2. The perpetrator intended to deprive the owner of the property and to appropriate it for private or personal use. 3. The appropriation was without the consent of the owner. 4. The conduct took place in the context of and was associated with an international armed conflict. 5. The perpetrator was aware of factual circumstances that established the existence of an armed conflict.¹²⁶ 	<p>The <i>Elements of Crimes</i> provide that the following establish the war crime of destroying or seizing the enemy's property:</p> <ol style="list-style-type: none"> 1. The perpetrator destroyed or seized certain property. 2. Such property was the property of an adversary. 3. Such property was protected from destruction or seizure under the international law of armed conflict. 4. The perpetrator was aware of the factual circumstances that established the status of the property. 5. The destruction or seizure was not required by military necessity. 6. The conduct took place in the context of and was associated with an international armed conflict. 7. The perpetrator was aware of factual circumstances that established the existence of an armed conflict.¹²⁷
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The systematic conduct of the Russian occupying authorities, Russian-controlled export companies, and vessels of the Russian Gray Grain Fleet detailed in this report satisfies the elements of the war crimes of pillage and seizing the enemy's property. Responsibility for these crimes may extend to individuals with effective control over the export companies and vessels identified in this report for their essential roles in the logistical supply chain of exporting pillaged grain. Further investigations are required to confirm with certainty that the grain that Russian

occupying authorities and companies under their control pillaged in the TOT of Ukraine is the same grain that the identified export companies and vessels received and transported. However, this is more likely the case than not given the logistical supply chain identified throughout this report.¹²⁸ The identified transport routes, operations, and relationships between Russian occupying authorities, export companies, and vessels of the Russian Gray Grain Fleet together make it reasonable to suspect the existence of a logistical supply chain in which all of these actors took part and through which the same pillaged grain passed.

This premise, that the grain that Russian occupying authorities pillaged in the TOT of Ukraine is the same grain that the identified export companies and vessels received and transported, is important for the present analysis. In the context of both the **war crime of pillage** and the **war crime of seizing enemy property**, “appropriation” and “seizure” of property encompass both direct and indirect appropriation and seizure; “[i]f wrongful interference with property rights has been shown” by direct appropriation or seizure, “it is not necessary to prove that the alleged wrongdoer was involved in the original wrongful” appropriation or seizure.¹²⁹ Instead, indirect appropriation or seizure, such as export companies and vessels receiving and transferring stolen property from an intermediary, the Russian occupying forces, can also constitute appropriation or seizure pursuant to the RS.¹³⁰

The last 2 elements for both the **war crime of pillage** and the **war crime of seizing enemy property** are identical and are satisfied here. The relevant actors had to have been aware of the factual circumstances that established the existence of an international armed conflict, and their conduct took place in the context of and was associated with that conflict. In June 2022, Russian occupying forces, Russian-organized export companies, and vessels of the Russian Gray Grain Fleet began appropriating property in the occupied areas of Ukraine following the full-scale invasion of Ukraine in February 2022. This appropriation occurred within the context of an international armed conflict between Ukraine and Russia. It is highly probable that those with effective control over **PALLADA**, **KUBAN-FORWARD**, and the vessels of the Russian Gray Grain Fleet were aware of the existence of an international armed conflict, given its widespread public recognition, and had knowledge that they were receiving and transporting grain from Russian entities in the temporarily occupied territories of Ukraine (TOT) within the context of and associated with the conflict, given the increase in profits that

these entities have made from their private export operations since the full-scale invasion. Similarly, the perpetrators' actions were linked to the armed conflict as they implemented the appropriation policy in and from the TOT of Ukraine either by order of or in concert with the Russian occupying authorities shortly after assuming key governmental positions. Assumption of these positions – enabling the authorities to control the market, agricultural production, and Ukrainian businesses – enabled the occupying authorities, export companies, and vessels to further policies of appropriating property throughout the TOT of Ukraine. Thus, the military invasion of the territory enabled the appropriation of Ukrainian property, with the armed conflict facilitating the commission of the crime.

3.2.1 War Crime of Pillage

In addition to the 2 elements presented above, the **crime of pillage** requires (1) the appropriation of property, (2) the perpetrator's intention to deprive the owner of it for private or personal use, and (3) its appropriation without the owner's consent. First, Russian-controlled export companies and vessels of the Russian Gray Grain Fleet indirectly appropriated grain from the TOT of Ukraine. As described in detail in PEJ's series of reports, Russian occupying authorities systematically appropriated grain from the TOT of Ukraine. This report has illustrated the logistical supply chain through which the Russian occupying authorities transferred ownership of the grain to third parties. With the occupying authorities as intermediaries, the export companies and vessels identified in this report received and transferred appropriated grain. As these entities do not need to have been involved in the original appropriation,¹³¹ their significant roles along the logistical supply chain satisfy this element.

Second, Russian occupying authorities, export companies, and vessels directly and indirectly appropriated Ukrainian-origin grain, intending to deprive the Ukrainian property owners of their rightful property and to use the appropriated property for private or personal use, whether for the perpetrators or third parties. The drafting history of the war crime of pillage under Article 8 of the RS confirms that the terms “private” and “personal” were intended to encompass cases of property given to third persons for their private or personal use. Case law similarly confirms that such use “includes situations where the perpetrator did not intend to use the pillaged items himself or herself.”¹³² Thus, the Russian occupying

authorities' transfers of appropriated grain to third-party export companies, the export companies' transfers to vessels, and the vessels' transfers to third countries each fulfill this element.¹³³

As demonstrated in this report, Russian occupying authorities, Russian-organized export companies, and vessels of the Russian Gray Grain Fleet appropriated and exported Ukrainian-origin grain for the private or personal use of financial profit. The grain was not appropriated for military use, i.e., to further the war effort, meaning it could not be justified by military necessity and, as such, was not lawful.

Last, Russian occupying authorities, Russian-controlled export companies, and vessels of the Russian Gray Grain Fleet appropriated Ukrainian-origin grain without the consent of property owners. Historically, violent expropriation was necessary to prove the owner's inherent lack of consent.¹³⁴ However, recent case law broadened the definition, allowing the inference of lack of consent when the owner is absent or under coercion.¹³⁵ As substantiated in PEJ's series of reports, the Russian occupying authorities systematically took advantage of Ukrainian owners' absence due to the war to appropriate property in the TOT of Ukraine and transfer ownership.¹³⁶ In addition to these direct appropriators, no actor in the logistical supply chain – including Russian-organized export companies or vessels of the Russian Gray Grain Fleet – received consent from Ukrainian property owners to receive and transfer, or appropriate, their grain.

The systematic conduct of Russian occupying authorities, Russian-controlled export companies including **PALLADA** and **KUBAN-FORWARD**, and vessels of the Russian Gray Grain Fleet in and from the TOT of Ukraine satisfy the elements of the war crime of pillage. These actors and entities directly or indirectly appropriated grain from the TOT of Ukraine without the consent of property owners and with the intention of depriving the owners of their grain, for the purpose of gaining financial profit. Further, this conduct took place in the context of, was associated with, and with awareness of the international armed conflict between Russia and Ukraine.

3.2.2 War Crime of Seizing Enemy Property

In addition to the 2 common elements presented above, the **crime of seizing enemy property** requires that (1) the perpetrator destroyed or seized property, (2) the property belonged to an adversary, (3) the property was protected from destruction or seizure under IHL, (4) the destruction or seizure was not required by military necessity, and (5) the perpetrator was aware of the factual circumstances that established the status of the property.

The first 2 elements are satisfied here. As established above, Russian occupying authorities, Russian-controlled export companies, and vessels of the Russian Gray Grain Fleet seized property that belonged to adversaries, i.e., Ukrainians. The definition of “adversary” is not limited to military or government officials or entities, but extends to civilians. While case law generally requires an “adversary” to be “an individual or entity aligned with or with allegiance to a party to the conflict adverse or hostile to the perpetrator,”¹³⁷ it is “sufficient to establish that the property did not belong to persons who were part of, or aligned with, an armed force or group the perpetrators were part of.”¹³⁸ This can be established by demonstrating the ethnicity or place of residence of the property owner¹³⁹ as not belonging to or allied with the perpetrator group in some way. Thus, the seizure of grain owned by Ukrainian civilians satisfies this element.

The third and fourth elements are also satisfied. These actors and entities seized civilian-owned property, which is protected from seizure under IHL, barring military necessity,¹⁴⁰ and that seizure cannot be justified by military necessity. The principle of military necessity permits only measures that are necessary to accomplish a legitimate military purpose that are not otherwise prohibited by IHL. Those with effective control over the export companies and vessels of the Russian Gray Grain Fleet sought personal and financial gain through their seizure of Ukrainian-origin grain, evidenced by the drastic increase in profits they gained from these shipments following the full-scale invasion. There is no indication that these seizures were carried out to serve a military necessity; instead, they served a private or personal use.

Last, Russian occupying authorities, Russian-organized export companies, and vessels of the Russian Gray Grain Fleet were aware of the factual circumstances that established the status of the property,

or that the seized grain was civilian-owned. There is no dispute that the Russian occupying authorities in the TOT of Ukraine knew that the grain they were seizing was civilian-owned private property. As described in more detail in PEJ's series of reports, the occupying authorities kept detailed property records that included ownership information, and their seizure policies specifically encompassed private property.¹⁴¹ Further, it is highly probable that every actor along the logistical supply chain, including those with effective control over Russian-organized export companies and the vessels of the Russian Gray Grain Fleet, had the same awareness. Their systematic, planned, and profitable export operations in cooperation with the Russian occupying authorities make it difficult to dispute this awareness.

The systematic conduct of Russian occupying authorities, Russian-controlled export companies including **PALLADA** and **KUBAN-FORWARD**, and vessels of the Russian Gray Grain Fleet in and from the TOT of Ukraine satisfy the elements of the war crime of seizing enemy property. These actors and entities directly or indirectly seized grain that belonged to an adversary or Ukrainian civilians and was protected from seizure under the international law of armed conflict. These actors and entities were also aware of the factual circumstances that established the status of the property, namely that the grain was civilian-owned and its seizure was not required by military necessity. Instead, its seizure was intended for financial gain. Further, this conduct took place in the context of, associated with, and with awareness of the international armed conflict between Russia and Ukraine.

While the conduct of these actors and entities in and from the TOT of Ukraine violates IHL rules protecting property and constitutes the war crimes of pillage and seizure of enemy property under international criminal law, a closer look at modes of liability is necessary to establish individual criminal responsibility.

3.2.3 Modes of liability

The corporate entities reasonably suspected of enabling the commission of pillage under international criminal and Ukrainian law, namely the Russian-controlled export companies **PALLADA** and **KUBAN-FORWARD**, and the vessels of the Russian Gray Grain Fleet – along with those with effective control over them – may bear corporate or individual criminal

responsibility under various **modes of liability** depending on their knowledge, intent, and level of participation.

While there are no international treaties that explicitly regulate **corporate criminal responsibility** for international crimes, resulting in international courts and tribunals largely extending their jurisdiction solely over natural persons, Articles 96.3 and 96.4 of the CCU provide for **criminal liability for legal entities** for international crimes.¹⁴² Pursuant to Article 96-3(1)(4), “criminal law measures” may apply to legal entities where an authorized person on behalf of the entity committed one (1) of the enumerated offenses, which include the war crime of pillage,¹⁴³ for the benefit of the entity. That benefit can be established if the offense “resulted in obtaining its improper advantage or created the conditions for such advantage or were aimed at evading liability under the law.”¹⁴⁴ Upon establishing these elements, the entity may be subject to a fine, forfeiture of property, or liquidation.¹⁴⁵

This report has established that it is reasonable to suspect that the corporate or legal entities of Russian-controlled export companies **PALLADA** and **KUBAN-FORWARD** and the vessels of the Russian Gray Grain Fleet committed the war crime of pillage through their distinct but essential roles along the logistical supply chain that enabled Russia's export of pillaged Ukrainian-origin grain from Crimean ports to third countries. While the Russian occupying authorities committed the original acts of pillage, these entities committed indirect acts of pillage by receiving and transferring ownership of pillaged grain. These acts were committed through covert practices with the intention of evading liability under the law. These acts further created conditions for improper advantage, evidenced by, for example, **PALLADA** and **KUBAN-FORWARD**'s control of approximately 55% of agricultural export operations from Crimean ports and their significant increase in profits from 2022 and 2023. As a result, the entities may be held criminally liable for the war crime of pillage under Ukrainian law, and may be subject to fines, forfeiture of property, and liquidation.

Additional modes of liability are available for individual corporate officers, including managers, directors, and other authorized persons associated with these enterprises. Both international and Ukrainian law provide for the modes of **direct commission** (or principal offender),¹⁴⁶ **co-perpetration** (or co-principal offender),¹⁴⁷ **ordering, soliciting, or inducing** (or instigator of the crime),¹⁴⁸ **aiding and abetting**,¹⁴⁹ **command and**

superior responsibility,¹⁵⁰ and **contributing to a group crime**.¹⁵¹ Further, international law provides for the modes of **indirect perpetration**¹⁵² and **indirect co-perpetration**,¹⁵³ while Ukrainian law criminalizes the mode of “**official negligence**,” i.e., non- or improper performance by an official of their official duties due to negligence, which caused significant damage to the rights, freedoms, and interests of specified entities.¹⁵⁴

This report has established that it is reasonable to suspect that individuals with effective control over the Russian-controlled export companies **PALLADA** and **KUBAN-FORWARD** and the vessels of the Russian Gray Grain Fleet committed the war crime of pillage through their distinct but essential roles along the logistical supply chain that enabled Russia's export of pillaged Ukrainian-origin grain from Crimean ports to third countries. While the Russian occupying authorities committed the original acts of pillage, these individuals enabled these entities to commit indirect acts of pillage by receiving and transferring ownership of pillaged grain. While further investigations into the individual corporate officers and their association with these entities and their relevant conduct is necessary, it is reasonable to suspect that those with effective control over these entities may be liable, at the very least, for **aiding and abetting**. This mode applies to individual corporate officers who have been identified as facilitating the commission of the war crime of pillage in the interest of these companies, leading to the unlawful receipt of illicit benefits. Such facilitation can include the provision of logistical, financial, or practical support or encouragement to those directly committing these crimes, with the intention of facilitating the commission of the crimes.¹⁵⁵ This report has detailed the logistical and practical support that these entities, by way of those with effective control over them, provided the Russian occupying authorities who directly committed the war crime of pillage, with the aim of facilitating pillage along the logistical supply chain. These entities received significant profits for their facilitation, and it is reasonable to suspect that those with effective control over these entities received significant profits as well.

PALLADA, KUBAN-FORWARD, the vessels of the Russian Gray Grain Fleet, and the individuals with effective control over these entities have financially benefited from their operations, essential to the logistical supply chain of grain export, and in turn have funded Russia's “occupation economy.” International and Ukrainian law can and should hold them accountable for, at the very least, aiding and abetting the crime of pillage. Further investigations and, where appropriate, criminal proceedings should be carried out against these actors.

3.3 The potential applicability of various sanctions regimes

Natural and legal persons, including vessels and companies, believed to be involved in the predatory disruption of the agricultural sector in Russian-occupied Ukrainian territories may be designated under various sanctions regimes. This section focuses on the regulations in place in the United States (US) and the European Union (EU), although other sanctions regimes may also be applicable, including those of the United Kingdom (UK), Canada.

In the US, designation for sanctions for conduct discussed in this report are governed by Executive Order 13685, dated December 19, 2014, “Blocking Property of Certain Persons and Prohibiting Certain Transactions with Respect to the CRIMEA Region of Ukraine” (“EO 13685”), and Executive Order 14024, dated April 15, 2021, “Blocking Property with Respect to Specified Harmful Foreign Activities of the Government of the Russian Federation” (“EO 14024”). Together, these Executive Orders open the door for sanctions designations for natural and legal persons engaging in the following activities: (a) operating in the Crimea region of Ukraine;¹⁵⁶ (b) being a leader of an entity operating in the Crimea region of Ukraine;¹⁵⁷ (c) being responsible for or complicit in, or having directly or indirectly engaged or attempted to engage in activities that undermine the peace, security, political stability, or territorial integrity of the United States, its allies, or its partners for or on behalf of, or for the benefit of, directly or indirectly, the Government of the Russian Federation;¹⁵⁸ or (d) having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of any prohibited activity or any person blocked pursuant to EO 14024.¹⁵⁹

The EU’s sanctions regime includes the March 2014 Council Regulation (EU) No. 269/2014 “concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine,”¹⁶⁰ and the July 2014 Council Regulation (EU) No. 833/2014 “concerning restrictive measures in view of Russia’s actions destabilizing the situation in Ukraine.”¹⁶¹ The EU adopted the latter Regulation to “apply additional restrictive measures with a view to increasing the costs of Russia’s actions to undermine Ukraine’s territorial integrity, sovereignty and independence and to promoting a peaceful settlement of the crisis.”¹⁶² In 2024, the EU amended the July 2014 Council Regulation (EU) No. 833/2014 through its June 2024 Council Regulation (EU) 2024/1745 to expressly include vessels. This amendment reflects the

EU's recognition of the serious threat that Russia's trade vessels, including those within the Russian Gray Grain Fleet, can pose to Ukraine's economic subsistence, food security, and overall territorial integrity, sovereignty, and independence.¹⁶³

3.3.1 Export companies and their officials

PALLADA, **KUBAN-FORWARD**, and those in effective control of these export enterprises may be designated pursuant to E.O. 13685, E.O. 14024, and Council Regulation (EU) No. 269/2014 for operating in Crimea or undermining or threatening the peace, security, political stability, territorial integrity, sovereignty, and independence of Ukraine. Cumulatively, **PALLADA** and **KUBAN FORWARD**, and those with effective control over them, play an essential role in supporting and implementing actions or policies that amount to an intricate pattern of pillaging grain from occupied Ukraine, including Crimea, and exporting it. By facilitating the export of Ukrainian-origin grain to third countries to the open market, these actors and entities directly and indirectly exploit Ukraine's agricultural resources, destabilize Ukraine's economy, exacerbate the plight of Ukrainian citizens, and profit as a result. These operations effectively fund the Russian authorities' occupation and illegal annexation of the TOT of Ukraine, advancing Russia's "occupation economy," expanding its economic advantage and control in the region, and threatening Ukraine's peace, security, political stability, territorial integrity, sovereignty, and independence.

3.3.2 Vessels

In addition to individual persons, entities, and bodies, the US and the EU may also designate vessels exporting pillaged grain from occupied Crimea.¹⁶⁴

In the US, vessels can be designated pursuant to the general grounds in the relevant Executive Orders; there are no grounds specifically listed as applying to vessels. All of the vessels comprising the Russian Gray Grain Fleet – including, in particular, **ZAID**, **ZAFAR**, **GRUMANT**, **SAN SEVERUS**, **SAN COSMAS**, **SAN DAMIAN**, **FEDOR**, and **GAM EXPRESS** – have, at one point or another, conducted activities that would satisfy the grounds upon which vessels may be designated in the US. In particular, they have

operated in the Crimea region of Ukraine and have likely provided material assistance, support, and services in support of prohibited activities.¹⁶⁵

In the EU, the 2024 amendment provides specific grounds for designating vessels, and additional grounds for designating natural or legal persons interacting with designated vessels. For vessels, the grounds include undermining or threatening the economic subsistence or food security of Ukraine, such as the transport of stolen Ukrainian grain (Article 3s(2)(d)); violating or circumventing provisions governing the EU sanctions regime (Article 3s(2)(f)); or being owned, chartered or operated by natural or legal persons, entities or bodies, or otherwise used in the name of, on behalf of, in relation with or for the benefit of natural and legal persons designated for sanctions by the EU (Article 3s(2)(g)).

The operations of the vessels of the Russian Gray Grain Fleet likely satisfy these grounds. As detailed throughout this report, the vessels have contributed to and supported the Russian occupying authorities' actions and policies that amount to an intricate pattern of pillaging grain from occupied Ukraine and exporting it. By transporting pillaged Ukrainian grain to third countries, these vessels have significantly benefited the Russian occupying authorities' "occupation economy" and destabilized Ukraine's economy. By collaborating with the Russian occupying authorities to export Ukrainian-origin grain to third countries, the vessels ultimately threaten the territorial integrity, sovereignty, and independence of Ukraine. Their export activities to third countries and the open market effectively fund the Russian occupation and illegal annexation of the occupied territories of Ukraine, and contribute to the advancement of Russia's "occupation economy." Finally, the operations of vessels in the Russian Gray Grain Fleet are largely arranged by the same brokers, and many operate under the same flags. The links between these vessels cannot be disputed, and suggest the possibility that they are owned or operated by already sanctioned natural or legal persons or entities. Further investigations are necessary to conclusively determine the owners, charterers, and operators of the vessels, whether they are already designated by the EU, and whether the vessels are used in the name of, on behalf of, in relation with, or for the benefit of these persons.

Prohibited activities relating to vessels designated for sanctions include direct or indirect engagement in ship-to-ship transfers or any other transfer of cargo with, or procurement of any service from, such a vessel.¹⁶⁶ As described in this report, the Russian Gray Grain Fleet is an intricate

operation that involves numerous vessels engaging in transshipment activities. Some of these vessels have already been sanctioned, including **ZAFAR**,¹⁶⁷ **SAN COSMAS**, **SAN DAMIAN**, and **SAN SEVERUS**.¹⁶⁸ It is therefore highly likely that some of the vessels of the Russian Gray Grain Fleet, at the very least engage with sanctioned vessels through cargo transfers.

In both the EU and the US, as well as other jurisdictions with similar sanctions regimes, there appear to be various grounds for designation that would apply to the entities and vessels examined in this report, and thereby halt the predatory disruption of the agricultural sector in Russian-occupied Ukrainian territories. Further investigations and, where appropriate, designations, should be carried out and imposed against these actors and entities.

4. CONCLUSION

Previous reports published by PEJ have established that Russian occupying authorities throughout the temporarily occupied territories of Ukraine have unlawfully enacted and enforced laws and policies enabling the pillage of Ukrainian agricultural businesses and products. The present report establishes that the logistical supply chain that enables this pillage does not stop in the occupied territories. Instead, Russian-organized export companies, including **PALLADA** and **KUBAN-FORWARD**, systematically receive pillaged grain from the occupied territories and transport the grain to Russian-controlled Crimean ports, from where vessels of the Russian Gray Grain Fleet export the grain to third countries.

The Russian Gray Grain Fleet is composed of at least 56 vessels sailing under Russian and other flags. Between March 2022 and December 2024, these vessels employed cabotage and transshipment tactics to export at least **2,500,000 metric tonnes** of grain through Crimean ports, to Syria, Turkey, Yemen, and other countries. These export operations ultimately benefit Russia's "occupation economy" by exploiting Ukraine's agricultural resources, destabilizing Ukraine's economy, and amassing enormous profits for Russian-organized entities.

While these findings are based on extensive and diverse evidentiary

sources, including OSINT, AIS monitoring, and documentary evidence, two (2) evidentiary limitations exist. First, Russia's new phytosanitary system only began operating in July 2023, making earlier data from phytosanitary certificates unavailable. OSINT data collected from independent experts has played a critical role in filling this gap in documentary evidence by providing visual confirmation of vessels' operations during this time. The second limitation pertains to this report's reasonable suspicion standard of proof. In the absence of physical inspections on port premises and unfettered access to Russian documentary evidence, it is not possible to demonstrate with precision that specific cargo being transported and exported by Russian-organized entities contains the same grain that was pillaged by Russian-organized entities. While this report relies on robust evidence establishing the existence of a logistical supply chain in finding with reasonable suspicion that these entities are in fact transporting and exporting the same pillaged grain, further investigation is necessary to demonstrate this conclusion in satisfaction of higher standards of proof required for criminal liability.

To this end, PEJ works closely with the **Prosecutor's Office of the Autonomous Republic of Crimea and Sevastopol City** and the **Prosecutor General's Office of Ukraine** to support their criminal investigations pertaining to Russia's use of Crimea as a logistical "gray hub" for the further export and sale of pillaged grain. This has already resulted in the opening of criminal cases and the seizure of one (1) vessel part of the Russian Gray Grain Fleet.

PEJ also encourages **investigations and the opening of proceedings under the principle of universal jurisdiction**. Countries that have adopted appropriate legislation, criminalizing the war crime of pillage and accounting for applicable modes of liability, are well-placed to prevent impunity for Russia's exploitation of Ukrainian-origin grain. Universal jurisdiction has been a successful avenue for achieving accountability in numerous contexts that have demanded unprecedented resource mobilization across the international community,¹⁶⁹ such as Syria¹⁷⁰ and Iraq.¹⁷¹ The situation in Ukraine demands the same and has already been the subject of universal jurisdiction cases, although not yet relating to the commission of pillage.¹⁷² One (1) recent and welcome effort to support investigations in Ukraine and beyond was announced by the UK in January 2025. The UK has developed a database to track and prevent Russia's pillage of grain from occupied Ukraine, and (at the time of writing) plans to share this database with Ukrainian authorities.¹⁷³

PEJ further calls on the **Office of the Prosecutor (OTP) of the International Criminal Court (ICC)** to include the activities along the Russian-organized logistical supply chain, namely the grain export operations detailed in this report, in its investigation. The ICC gained jurisdiction over the Situation in Ukraine following 2 self-referrals by Ukraine on April 9, 2014,¹⁷⁴ and September 8, 2015,¹⁷⁵ respectively, under Article 12(3) of the RS. Following the referral of the Situation in Ukraine by 39 States Parties to the ICC in response to the full-scale invasion, the OTP opened an investigation on March 2, 2022.¹⁷⁶ Ukraine has since deposited its instrument of ratification of the Rome Statute, which entered into force on January 1, 2025.¹⁷⁷ As detailed in this report's legal analysis, the operations of the Russian Gray Grain Fleet fit squarely within the chapeau of Article 8 of the RS, which establishes a jurisdictional threshold for prosecuting war crimes particularly when committed as part of a plan or policy. Russia's systematic and policy-driven export of pillaged Ukrainian-origin grain from Crimean ports to third countries likely amounts to the war crimes of pillage and seizing the enemy's property and should be of particular interest to the OTP.

In addition to ongoing national and international investigations and criminal cases, there are also **non-judicial efforts outside of Ukraine** that require mobilization. PEJ urges the US, EU, and those with similar sanctions frameworks, to include the Russian Gray Grain Fleet's export operations in their investigations and to designate vessels identified in this report for their involvement in the transportation of pillaged grain, along with individuals with effective control over the vessels, importing countries, and Russian officials responsible for issuing relevant phytosanitary certificates.

The Russian Gray Grain Fleet's exploitative export operations have been destabilizing Ukraine's economy, exacerbating the plight of Ukrainian citizens, and benefiting the Russian occupying authorities since the full-scale invasion began in 2022. Accountability for Russia's commission of pillage in occupied Ukraine – throughout every stage of the logistical supply chain from initial acts of pillage through the import of pillaged grain by third countries – can and should be pursued through various methods, including criminal proceedings and sanctions, and in various jurisdictions and fora.

APPENDIX 1. METHODOLOGY AND EXPLANATION OF SOURCES

Since Russia does not provide data relating to its activities in the temporarily occupied territories (TOT) of Ukraine, namely export statistics, it is impossible to determine the exact amount of agricultural goods pillaged by the Russian occupying authorities and companies. However, through the assessment of multiple sources, PEJ is able to establish the minimum amount of pillaged agricultural products by applying the standard of proof of “reasonable suspicion.” In other words, there is “a reliable body of material consistent with other verified circumstances tending to show that an incident or event did happen.”¹⁷⁸

To this end, PEJ relies primarily on (1) Open Source Intelligence (OSINT) data collected from independent experts; (2) an open access Automatic Identification System (AIS) monitoring tool, which enables vessel identification, live tracking of vessels of interest (Vol) and export shipments, and the establishment of illegal patterns; and (3) phytosanitary certificates issued by Russia’s Federal Service for Veterinary and Phytosanitary Surveillance. The first of these sources has been critical in filling gaps in documentary evidence and providing visual confirmation of vessels’ operations between March 2022 and July 2023, as the new Russian phytosanitary system only began operating in July 2023. A closer look at the latter two (2) sources will provide better insight into PEJ’s methodology and analysis.

1.1 Automatic Identification System (AIS) Data

PEJ monitors, collects, and analyzes bulk AIS data of Vol, which is commercially available.¹⁷⁹ AIS uses GPS coordinates to locate and display the location of vessels. This data is imperfect as vessels can go “dark” by deactivating their AIS transmission. While there are legitimate reasons for a vessel to go dark, such as when passing through dangerous waters, a vessel can also go dark as a method to deliberately obfuscate their movements and activities. As AIS cannot capture any activities carried out during these periods of invisibility, of particular interest to PEJ’s investigations are gaps in transmission that would provide enough time for a vessel to conduct covert activities.

There are 3 primary factors that indicate potential illegal activity of Vol:

the purpose for a vessel's AIS deactivation; the AIS draught; and the vessel speed. First, if a vessel's previous AIS activity and normal transmission rate demonstrate a regular and structured pattern, any deviation from this pattern might indicate manual deactivation of AIS for covert purposes and warrant closer investigation. A vessel with commonly occurring larger transmission gaps could also indicate the manual deactivation of the AIS transmitter at regular intervals, and thus "dark" activity. However, deactivation might also occur for legitimate, non-covert purposes. For instance, AIS signals from a vessel in the Black Sea could disappear at certain points due to environmental factors.¹⁸⁰

Second, a vessel's draught is the depth of the vessel below the waterline, and it varies according to the vessel's load. A discrepancy (an increase or decrease) between two (2) captured draught readings of a vessel indicates that some form of transfer has occurred.¹⁸¹ In such a case, it can be deduced that the vessel either made a port call during dark activity or conducted a ship-to-ship transfer. Such an attempt to complete activity without visibility or a record of the operation further indicates that the activity was of an illegal nature.

Last, while the time a vessel goes dark, the time an AIS signal reappears, and the corresponding locations are fixed variables captured in AIS data, vessel speed is not a fixed variable and can change. As a result, the last recorded vessel speed is not necessarily the speed at which the vessel continued to travel. Given that the primary aim of the analysis is to identify possible port calls and ship-to-ship transfers, it should be assumed that the vessel was traveling at a maximum possible speed, subject to any prevailing conditions, during the transmission gap.¹⁸²

1.2 Phytosanitary Certificates

The International Plant Protection Convention of 1997 establishes standards for the circulation and trade of plant products.¹⁸³ This intergovernmental treaty, deposited with the United Nations Food and Agriculture Organization (FAO), requires each contracting state, including the Russian Federation, to establish a national plant protection organization responsible for issuing certificates relating to phytosanitary regulations in accordance with enumerated standards.

In the context of international trade, modern trade requirements for

exporters have necessitated a transition from paper to electronic certificates. Currently, most countries are shifting to electronic documentation, with Europe and the United States at the forefront of this transition.

While Russian authorities issue **phytosanitary certificates**,¹⁸⁴ the Russian Federation has only implemented a local system, ARGUS, for the electronic exchange of phytosanitary certificates with states part of the Customs Union.¹⁸⁵ The electronic phytosanitary certificate system of the FAO, ePhyto, is not operational in Russia.¹⁸⁶ As a result, the FAO lacks access to electronic certificates issued by Russia. Meanwhile, Russia continues to use paper certificates in adherence with international standards.

In addition to phytosanitary certificates, there are also **quarantine certificates**. These certificates provide a comprehensive overview of trade, harvest, and export activities and are primarily used as a tool for internal monitoring of the domestic spread of quarantine organisms when relevant events occur. As the Russian occupying authorities mandate the issuance of quarantine certificates for all export operations involving grain, these certificates can also serve as evidence of Russia's practice of pillaging Ukrainian agricultural commodities with the goal of reselling them to third countries.

PEJ only has access to Russian-issued certificates issued after July 2023, when ARGUS was launched.¹⁸⁷ PEJ has decoded the numbers used in these certificates and determined that they correspond with officers who issued them in Crimea, whom PEJ was able to identify. These findings, presented further in this report, support the conclusion that the grain transported by Russian vessels through Crimean ports is of Ukrainian origin and that Russia's taking, transportation, and reselling of the grain is thus illegal.

As of the date of publication, PEJ has extracted 123 phytosanitary certificates, issued in the TOT of Ukraine (Crimea, Zaporizhzhia, and Kherson Oblasts) custom zone between July 2023 and December 2024. Further investigation is necessary and underway to identify the responsible officials for customs services at the ports of Kerch, Berdiansk, and Mariupol.

PEJ internally developed an algorithm for finding and extracting certificates based on sequential URL requests to servers in order to

determine which certificates have been published based solely on their numbers. If a certificate had been published (i.e., the respective URL existed), it was downloaded, indexed, and automatically parsed for later analysis. Importantly, while this algorithm resulted in a large number of downloaded certificates, this approach cannot guarantee that all certificates from the given period were collected, only that all the downloaded certificates were published.

By cross checking and confirming data across these sources, PEJ has been able to ascertain an estimated number of Russian voyages from Crimean ports, and to thus reasonably infer the total amount of agricultural products being exported. This has been possible by aggregating and analyzing data on “incidents” as they correspond with particular vessels. For the purposes of this report, an incident is defined as a single departure of a particular vessel from a Crimean port, based on reasonable suspicion. Each incident includes the start date when the vessel docked at a Crimean port or stayed close to the Crimean seacoast, loading dates if available, the departure date, and the port of destination.

For some incidents, due to the scarcity of evidentiary sources, it was impossible to investigate or confirm whether some vessels were fully loaded, or loaded at all, upon departing from Crimean ports. For this reason, the findings in this report are based on a minimum number of incidents, and all monitored vessels are considered fully loaded upon departure. This assumption is based on both the economic inefficiency of moving vessels without loaded goods and documentary evidence confirming that vessels departing from Crimean ports were fully loaded in the vast majority of incidents¹⁸⁸.

With the organic development of PEJ products and new investigative findings, the evidence base may continue to expand, incorporating new OSINT sources and new Russian datasets on trade operations, or by merging existing information with current customs databases, such as Abrams.¹⁸⁹ Thus, the evidence base is subject to progressive evolution and may be updated or adjusted in the future.

1.2.1 Decoding phytosanitary and quarantine certificates

Phytosanitary and quarantine certificates, which are not open to the general public, each have 18-number codes. The below tables explain

how to decode and understand what these codes signify.

Phytosanitary certificate numbers

Code format: (XXX YY ZZ PP DDMMYY SSS)

XXX	Import Country code as per Russia OKSM system (3-digit code) ¹⁹⁰
YY	Territorial Directorates of Rosselkhoz nadzor (2-digit code)
ZZ	Department code inside a Directorate (2-digit code)
PP	Inspector Person individual code (2-digit code)
DDMMYY	Date in format DAY-MONTH-YEAR (6-digit code)
SSS	Serial number of the certificate issued by a certain inspector on a certain day (3-digit code)

Quarantine certificate numbers

Code format: XX YY ZZ OO DDMMYY SSSS

XX	Destination region code as per Russia regional tax system code (2-digit code)
YY	Origin region code as per Russia regional tax system code (2-digit code)
ZZ	Origin region sub code (2-digit code)
OO	Reserve, always contain "00" (2-digit code)
DDMMYY	Date in format DAY-MONTH-YEAR (6-digit code)
SSSS	Serial number of the certificate issued by a certain inspector on a certain day (4-digit code)

1.2.2 Individuals responsible for issuing certificates

The Southern Interregional Directorate of the Federal Service for Veterinary and Phytosanitary Surveillance is the body responsible for issuing phytosanitary certificates for export in the Crimean ports, including Sevastopol, Kerch, and Feodosia.¹⁹¹ PEJ has identified individual officers who could be found responsible for issuing the certificates, detailed in the table below.

Directorate	Dept.	#	Official	Russian Name	Position
Feodosia					
23	63	06	GLAZKRITSKAYA O. I. ¹⁹²	Глазкрицкая (Степаненко) Ольга Ивановна	Chief State Inspector of the Feodosia customs post ¹⁹³
Sevastopol					

23	66(11)	03	BAYANOVA N. V. ¹⁹⁴	Баянова (Морозова) Надія Валеріївна	Chief State Inspector of the Department of Federal Service for Veterinary and Phytosanitary Surveillance at the State Border ¹⁹⁵
23	66	07	GAVRILOVA V. YU. ¹⁹⁶	Гаврилова Викторія Юрьевна (RUS)	Chief State Inspector of the Department of Federal Service for Veterinary and Phytosanitary Surveillance at the State Border ¹⁹⁷
23	66	05	SURKOVA T. N. ¹⁹⁸	Суркова Татьяна Николаевна (RUS)	Senior State Inspector of the Department of Federal Service for Veterinary and Phytosanitary Surveillance at the State Border ¹⁹⁹
23	66	08	TROFIKOVA V. V. ²⁰⁰	Трофимова В.В. (8692) 42-38-14 avlita@mail.ru (RUS)	Customs post at Kamyshovaya Bukhta ²⁰¹
	66		KOZELSKAYA T. S.		
	66		ZAKHAROVA Z. A.		State Inspector of the Department of State Phytosanitary Control and Supervision at the State Border of the Russian Federation in Sevastopol; Performed duties of an inspector in occupied Kherson Oblast ²⁰²

APPENDIX 2. COMPOSITION AND STATUS OF THE RUSSIAN GRAY GRAIN FLEET'S OPERATIONS

PEJ has compiled detailed information on the composition and status of the Russian Gray Grain Fleet's operations as of December 2024.

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
AZBURG	9102899	~ 11,850	Dominica	Unknown	Unknown			
AZOV CONCORD	9387748	~ 10,760	Marshall Islands	AZOV CONCORD SHIP-PING CORP - Turkey	SARFO DENIZCILIK VE TICARET AS - Turkey			
FEDOR	9431977	~ 13,772	Russia	ANSHIP LLC - Russia	ANSHIP LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²⁰³	Krutikov Oleksandr Serhiiovych, (the captain of the vessel "FEDOR"), 14.02.2023. ²⁰⁴	Positions from: 2022; 2023; 2024
SAN SEVERUS (ex-FINIKIA)	9385233	~ 21,590	Swaziland	SYRIAMAR - Syria	SYRIAMAR - Syria	The vessel was seized within the framework of this criminal proceeding. ²⁰⁵		Positions from: 2022; 2023; 2024
LADY AUGUSTA	9163568	~ 8,870	Jamaica	ADRIAMED-ITERAN LTD - Lebanon	ADRIAMED-ITERAN LTD - Lebanon			
SAN COSMAS (ex-LA-ODICEA)	9274343	~ 15,952	Tanzania	ALHOUDA HOLDING LTD - Mahe Island Seychelles	ALHOUDA HOLDING LTD - Mahe Island Seychelles	The vessel was seized within the framework of this criminal proceeding. ²⁰⁶	Hasan Aris, a citizen of Syria received a maritime education in Odesa, stayed in Ukraine for permanent residence after his studies. (the captain of the vessel "SAN COSMAS"). ²⁰⁷	Positions from: 2022; 2023; 2024

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
M.AN-DREEV	8946377		Russia	DON RIVER SHIPPING JSC - Russia	ROSS-HIPCOM - Russia	The vessel was seized within the framework of this criminal proceeding. ²⁰⁸	Korzhov Hennadii Anatoliiovych, (the captain of the vessel "M.AN-DREEV"), 11.04.2023. ²⁰⁹	
MATROS KOSHKHA	9550137	~ 37,320	Russia	CRANE MARINE CONTRACTOR LLC - Russia	CRANE MARINE CONTRACTOR LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²¹⁰	Vasyliev Vitalii Valerieiovych, (the captain of the vessel "MATROS KOSHKHA"), 08.09.2022. ²¹¹	Positions from: 2022
MATROS POZYNICH	9573816	~ 37,320	Russia	CRANE MARINE CONTRACTOR LLC - Russia	CRANE MARINE CONTRACTOR LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²¹²	Yelahin Mykola Oleksandrovych, (the captain of the vessel "MATROS POZYNICH"), 14.07.2022. ²¹³	Positions from: 2022
MIKHAIL NENASHEV	9515539	~ 37,320	Russia	CRANE MARINE CONTRACTOR LLC - Russia	CRANE MARINE CONTRACTOR LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²¹⁴	1) Zhelezniak Andrii Serhiiovych, (the captain of the vessel "MIKHAIL NENASHEV"), 14.07.2022. ²¹⁵ 2) Nieviedrov Denys Viktorovich, (the captain of the vessel "MIKHAIL NENASHEV"), 14.03.2024. ²¹⁶	Positions from: 2022; 2023
MATROS SHEVCHENKO	9574195	~ 37,320	Russia	Unknown	Unknown		Volodymyr Horbenko (the captain of the vessel "MATROS SHEVCHENKO"). ²¹⁷	Positions from: 2022; 2023

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
NADEZHDA	8611221	~ 3,983	Russia	KOSTER LLC - Russia	KUBAN MARINE COMPANY LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²¹⁸		Positions from: 2022; 2023
VERA	8602957	Unknown	Russia	PETROKHEB-KUBAN LLC - Russia	PETROKHEB-KUBAN LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²¹⁹	Ovchynnikov Viktor Yakovych, (the captain of the vessel "VERA"), 14.02.2023. ²²⁰	Positions from: 2022; 2023
SORMOVSKIY-48	8226428	~ 4297	Russia	KUBAN MARINE COMPANY LLC - Russia	KUBAN MARINE COMPANY LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²²¹	Halanov Oleh Borysovych, (the captain of the vessel "SORMOVSKIY 48"), 14.02.2023. ²²²	Positions from: 2022; 2023
KRASNO-DAR	9296781	~ 58,209	Russia	KUBAN MARINE COMPANY LLC - Russia	KUBAN MARINE COMPANY LLC - Russia			Positions from: 2022; 2023
ANT	8407230	Unknown	Russia	Petrokhleb Kuban LLC - Russia	Petrokhleb Kuban LLC - Russia		Sholom Andrii Mykolaiovych, (the captain of the vessel "ANT"), 30.05.2023. ²²³	Positions from: 2022; 2023
RM-3	8877241	Unknown	Russia	BRIMWELL INTER LTD - Russia	RIVER SEA MANAGEMENT CO LTD - Russia			
SMARTA	9396567	~ 22,093	Liberia	SMARTA SHIPPING LTD - Scotland	SMARTA SHIPPING LTD - Scotland			
SV.NIKOLAY	9482926	~ 11,440	Russia	RIVER S PLUS LLC - Russia	RIVER S PLUS LLC - Russia			Positions from: 2022

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
SAN DAMIAN (ex-SOURIA)	9274331	~ 665	Swaziland (ex-Syria)	ALHOUDA HOLDING LTD - Mahe Island Seychelles	LEVANT FLEET LTD - United Kingdom	The vessel was seized within the framework of this criminal proceeding. ²²⁴		Positions from: 2023
TZAREVNA	9145231	~ 24,948	Malta	NAVIBORN LTD - Bulgaria	NAVIBORN LTD - Bulgaria			
ZHIBEK ZHOLY	9598880	~ 9,999	Russia	KTZ EXPRESS SHIPPING TOO - Kazakhstan	QAZAQ MARITIME PARTNER LLP - Kazakhstan			
BLUE STAR I	9375159	~ 6,548	Panama	Unknown	Unknown			
CAPITAN KORCHIN	8959219	~ 6370	Russia	ROSSHIPCOM - Russia	ROSSHIPCOM - Russia	The vessel was seized within the framework of this criminal proceeding. ²²⁵	Kozlobaiev Oleksandr Yuriiovych, 09.07.1983 (the captain of the vessel "CAPITAN KORCHIN"), 17.11.2022. ²²⁶	
SV KONSTANTIN	9203710	Unknown	Russia	ALFA-LEASING LLC - Russia	KAMA LTD - Russia	The vessel was seized within the framework of this criminal proceeding. ²²⁷		Positions from: 2022
VOLGO DON 205	8959166	~ 6270	Russia	VOLGO-DON 219 SHIPPING LTD - Russia	Unknown	The vessel was seized within the framework of this criminal proceeding. ²²⁸		
VOLGO DON 5043	8866321	~ 6270	Russia	DON RIVER SHIPPING JSC - Russia	DON RIVER SHIPPING JSC - Russia	The vessel was seized within the framework of this criminal proceeding. ²²⁹		

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
VOLGO BALT 106	8230077	~ 4720	Russia	ZENIT - Russia	ST PETERSBURG SHIP-PING CO LTD - Russia	The vessel was seized within the framework of this criminal proceeding. ²³⁰		
LAVRION	8729195	~ 4064	Russia	SERGEEV-ICH/GRIG-ORYEVNA - Russia	SERGEEV-ICH SY - Russia			
AMUR 2501	8721272	Un-known	Russia	CHERNIKOV Y - Russia	RED SHIP-PING LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²³¹	Podhorbunskyi Serhii Mykhailovych, (the captain of the vessel "AMUR 2501"), 08.09.2022. ²³²	
COMETA (ex - PAWELL)	8315499	Un-known	Syria	COMETA SHIPPING LTD - Turkey	COMETA SHIPPING LTD - Turkey			
VOLGO BALT 188	8875530	~ 4720	Russia	VICTORIA - Russia	Unknown	The vessel was seized within the framework of this criminal proceeding. ²³³		
RAZONI	9086526	~ 37500	Sierra Leone	RAZONI SHIPPING LTD - Turkey	RAZONI SHIPPING LTD - Turkey			
ALEXANDER GRIN	9057331	~ 3,420	Cameron	NWS 10 BALT SHIPPING CO LTD - Turkey	KINGSTON GLOBAL TRADE IC VE - Turkey	The vessel was seized within the framework of this criminal proceeding. ²³⁴		
ELGA-1	8848408	Un-known	Russia	RIVER SEA MANAGEMENT CO LTD - Russia	RIVER SEA MANAGEMENT CO LTD - Russia			Positions from: 2023
ALTARF (KUDMA 4)	9100190	~ 2,230	Russia	KUDMA 4 CARGO SHIP LTD	KUDMA SHIPMAN-AGEMENT LLC	The vessel was seized within the framework of this criminal proceeding. ²³⁵	Titov Viacheslav Ivanovich, 10.05.1962 (the captain of the vessel "ALTARF"), 22.03.2023. ²³⁶	Positions from: 2023

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
GAM EXPRESS (ex-LADY IMAN, NAR-SIS, HAJE AMIRA)	8204119	~ 999	Guinea-Bissau	MGA SHIPPING CO - Romania	AGM EXPRESS CO - Romania		Zian Ali (the captain of the vessel "GAM EXPRESS"), ²³⁷	Positions from: 2022; 2023; 2024
ZAFAR	9720263		Russia	Unknown	SALMI SHIP-MANAGEMENT LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²³⁸	Bieliakov Yurii Volodymyrovych, (the captain of the vessel "ZAFAR"), 05.03.2024. ²³⁹	Positions from: 2022; 2023; 2024
ZAID	9715270		Russia	Unknown	SALMI SHIP-MANAGEMENT LLC - Russia		Mykhailo Yezhov (the captain of the vessel "ZAID"), ²⁴⁰	Positions from: 2022; 2023; 2024
INZHENER TRUBIN	8502080	~ 9,890	Russia	NORTHERN SHIPPING - Russia	NORTHERN SHIPPING - Russian			
SMP NO-VODVINSK	9398046	~ 7,893	Russia	NORTHERN SHIPPING - Russia	NORTHERN SHIPPING - Russia			
ALFA M (ex-SALVINIA)	9419084	~ 12,915	Russia	ASTON SHIPTRADE CORP - Russia	KRECHET LLC - Russia	The vessel was seized within the framework of this criminal proceeding. ²⁴¹	Dolzhenkov Yevhenii Petrovych, (the captain of the vessel "ALFA M"), 24.01.2024. ²⁴²	Positions from: 2023
PRINCE 4	8512865	~ 15,051	Comoros	MASSA SHIPPING CO - Greece	INDIVIDUAL SHIPPING LTD - Greece			
GRUMANT	9385879	~ 25,298	Russia	MURMANSK SHIPPING - Russian	DECISION LLC - Russian		Serhei Yhorevych Vyvyorra, Russian passport № 4716 556845 (the captain of the vessel "GRUMANT"). ²⁴³	Positions from: 2022; 2023; 2024

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
ENISEY	9079169	~ 54,666	Russia	TK NORD PROJECT - Naberezhnaya Severnoy Dviny - Russia	TK NORD PROJECT - Naberezhnaya Severnoy Dviny - Russia		Sokolov Dmitry Alekseevich, lives in Arkhangelsk, has a Russian passport №1102 619197 (the captain of the vessel "ENISEY"). ²⁴⁴	
SOFIA (ex-BLUE IVY)	9245263	~ 13,766	Russia	STRATEGIC GRAIN MANAGEMENT LLC - United Arab Emirates	STRATEGIC GRAIN MANAGEMENT LLC - United Arab Emirates		Ryzhov Serhii Viktorovy, Russian passport № 753798938 (the captain of the vessel "SOFIA"). ²⁴⁵	
ALPHA HELIOS	9924340	~ 11,292	Russia	ALPHA LLC - Russia	ALPHA LLC - Russia			Positions from: 2023; 2024
SMP SEVEROD-VINSK	9376440	~ 7,921	Russia	NORTHERN SHIPPING - Russia	NORTHERN SHIPPING - Russia			
BOMUSTA-FA O	9114476	~ 31,001	Panama	ALVION MARITIME LTD - United Arab Emirates	TOWER SHIPPING CO SA - United Arab Emirates			Positions from: 2023
NAVASHINO	8956968	~ 11734	Russia	ARCTIC-TRANS LTD - Russia	ARCTIC-TRANS LTD - Russia		Avtokratov Oleksandr Oleksandrovych, (the captain of the vessel "NAVASHINO"), 19.07.2023. ²⁴⁶	Positions from: 2023
USKO MFU	7919781	~ 5,579	Cameroon	MED VOYAGER SHIPPING INC - Turkey	GUHA INSAAT MERMER MADENCILIK - Turkey		Aslanov Vakil Vakil, citizen of Azerbaijan (the captain of the vessel "USKO MFU"). ²⁴⁷	
VOLGO BALT 203	8841620	Unknown	Russia	VICTORIA - Russia	Unknown			
GRAND	8877253	Unknown	Russia	TRANSNIVERSHIP-PIPING LLC - Russia	Unknown			

Vessel Name	IMO	Capacity (m3)	Flag	Owner	Ship Manager	Criminal Proceeding	Captain	AIS
DAMAS WAVE (ex-GOLDEN YARA)	8915299	~ 17,989	Co-moros	CEDAR MARINE SERVICES SAL -, Lebanon	CEDAR MARINE SERVICES SAL - Lebanon			
KAPITAN KOKOVIN	9279422	~ 5,323	Russia	NORTHERN SHIPPING - Russia	NORTHERN SHIPPING - Russia			

APPENDIX 3. ACTIVITIES OF EXPORT COMPANIES

PEJ has analyzed extensive documentary evidence to determine the activities of companies exporting agricultural products from Crimean ports, including contracts, bills of lading, and phytosanitary certificates. The following tables and chart detail these activities for the period between July 2023 and December 2024.

Export activities based on both factual and documentary evidence.

Exporter	Phytosanitary Certificates	Vessels	Voyages	x1,000 MT
AGRO-FREGAT	196236306171123004, 196236306300324001, 196236605120324001, 422236306160224001, 422236306160224003, 760236306051023003, 760236306130524002, 792236306051023001, 792236306061023001, 792236306190823001, 792236605040324001, 792236605110524001, 792236605131123002, 792236607190624001, 792922369221224001	ALPHA HELIOS	1.5	11.3
		AYA ZANOUBYA 3	0.5	2.3
		FEDOR	0.7	5.8
		GOLDEN YARA	1.2	4.5
		KONAK	0.8	1.9
		USKO MFU	4.0	13.8
AGROGRAINEXPORT	760922367021224001, 760922367021224002, 760922367041124001, 760922367041124002, 760922369190924001	MATROS POZYNICH	2.0	54.8
		MATROS SHEVCHENKO	1.0	27.5
AGROGROUP	792236306090524002, 792236306100124002, 792236306110424002, 792236306140424001, 792236306220524001, 862236605250424001, 862236612160824001	ENISEY	2.0	54.0
		GAM EXPRESS	1.0	2.9
		SS GRAYWOLF	3.5	7.0

KUBAN-FORWARD	364236605040723001,	MATROS KOSHKA	6.0	142.7
	364236605040723002,	MATROS POZYNICH	1.0	25.0
	364236605050723001,	MATROS SHEVCHENKO	4.0	106.5
	760236603100224001,	MIKHAIL NENASHEV	1.0	27.4
	760236603101023001,			
	760236603301023001,			
	760236605010424001,			
	760236605200624001,			
	760236605211123001,			
	760236605220923001,			
	760236607020524001,			
	760236607100524002,			
	760236607150324001,			
	760236608251223001,			
	760236610010324001,			
	760236610201223001,			
	760236610250124001	SAN SEVERUS	4.0	68.6
MAKOVEYA	818922365151124001	ANKA	1.0	4.6
MOSTAGRO	818922368241224001	MATROS SHEVCHENKO	1.0	27.5
NZK	434231103070823001,	SAN COSMAS	3.0	34.5
	792231108260823002,			
	792236605081023001,	VIKTOR ZABELIN	1.0	8.1
	818231105020923001			

PALLADA	364236605201023001,	ALFA M	1.0	9.5
	364236605201023002,	GRUMANT	8.0	158.3
	364236607151023001,	MATROS KOSHK	4.0	110.3
	760231103230823001,	MATROS POZYNICH	2.0	54.7
	760231108030923001,	MATROS SHEVCHENKO	1.0	27.2
	760236603021023001,	MIKHAIL NENASHEV	8.0	218.6
	760236603070224001,	NOVAYA ZEMLYA	1.0	19.9
	760236603070224002,	SAN COSMAS	1.0	11.5
	760236603100324001,	SAN DAMIAN	4.0	47.5
	760236603190224001,	SAN SEVERUS	1.0	17.0
	760236603230224001,	ZAFAR	4.0	138.7
	760236603270224001,			
	760236605130424001,			
	760236605200324001,			
	760236605240324001,			
	760236605240624001,			
	760236607030124001,			
	760236607030324002,			
	760236607030824001,			
	760236607100524001,			
	760236607110124001,			
	760236607200424001,			
	760236607260524001,			
	760236608061123001,			
	760236608161223001,			
	760236608251023001,			
	760236608291223001,			
	760236608310124001,			
	760236610020424001,			
	760236610060424001,			
	760236610090624001,			
	760236610130724001,			
	760236610300824001,			
	760236612090924001,			
	760236612270724001,			
	760922366281024001,			
	760922366281124001,			
	760922366300924001,			
	760922367151024001,			
	760922367311024001,			
	760922368111024001,			
	818922369271224001,			
	887922365131224001	ZAID	6.0	207.7
TD FREGAT	196236306130823003,	ALPHA HELIOS	0.5	2.1
	196236306171123003,	AYA ZANOUBYA 3	0.5	1.5
	422236306160224002,	FEDOR	0.3	2.9
	760236306130524001,	GOLDEN YARA	2.8	29.3
	792236306051023002,	KONAK	1.2	3.3
	792236306061023002,			
	792236306171123001,			
	792236306171123002,			
	792236605110524002,			
	792236605110524003,			
	792236605131123001,			
	792236607190624002,			
	792922369221224002	USKO MFU	1.0	3.4

TD IDEALPROD	818236605210824002, 818922366091124001, 818922366311224001, 818922366311224002, 887236605230524001, 887236605230524002, 887922365061024001	DAMAS WAVE	1.0	13.1
		SAN DAMIAN	1.0	12.0
		SAN SEVERUS	1.0	16.8
		ZAFAR	2.0	71.2
TERRA TRADE COMPANY	818236607160424001, 818922365280924001, 818922369261224001, 818922369261224002	PRINCESS EVA	2.0	19.0
		SAN COSMAS	1.0	10.0
TEZORI DELLA TERRA	792236306241223001	SAN COSMAS	1.0	6.6
UG-ZERNO	792236306110424001	SS GRAYWOLF	0.5	1.0
ZERNOEXPORT	434236603050824001, 434236605020924001	MATROS SHEVCHENKO	1.0	27.4
		SAN SEVERUS	1.0	17.2
N/A (factual evidence)		FEDOR	23	207
		GAM EXPRESS	1	2.9
		SAN COSMAS	3	34.5
		SAN DAMIAN	9	108
		SAN SEVERUS	8	137.2
		ZAFAR	1	35.7
		ZAID	3	107.1
Grand Total			147.0	2520.7

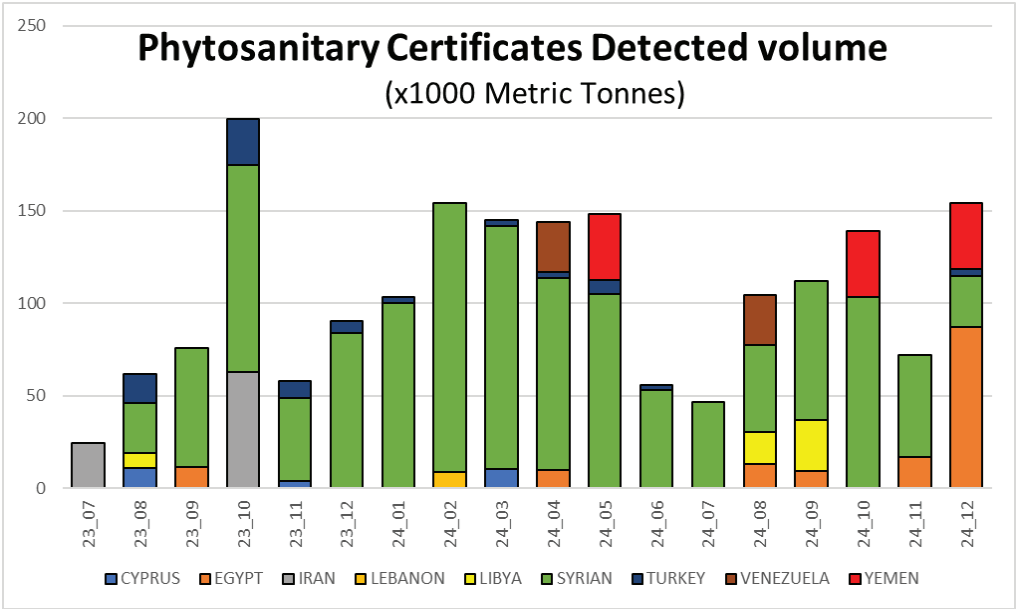
Importers who have received grain transported from Crimean ports (as of December 2024) based on both factual and documentary evidence.

Importer	CYPRUS	EGYPT	IRAN	LEBANON	LIBYA	SYRIA	TURKEY	VENEZUELA	YEMEN	N/A	Grand Total
ADAMZ GRAIN		9.5									9.5
AKAT NAKLIYAT TURIZM TICARET LIMITED SIRKETI							4.6				4.6
AL MOSAN-DA AL OULA CO					44.6						44.6
AL OLA TRADING CO						2.7					2.7
AL SADAT GLOBAL FOR IM-PORT AND EXPORT		42.0									42.0

BUGDAY FILIZI DIS TICARET VE SANAYI LIMITED SIRKETI					8.1						8.1
COMER- CIALIZA- DORA Y DISTRIBUI- DORA GRU- PO GRAN CHINITA								27.0			27.0
CORPO- RACION VENETRIGO 2024 C.A								27.0			27.0
ELDABA GLOBAL TRADING		27.5									27.5
GREEN CORNER FOR IM- PORT AND EXPORT		11.5									11.5
HOLLY GRAINS TRADING LTD	11.0										11.0
KRUGO- ZOR LINES LOJISTIK DENIZ							3.4				3.4
MERCALIX TRADE DMCC							6.6				6.6
META TRADE		10.0									10.0
MEZZEH						1311					1311
MUROUJ ALRABIE FOODSTU									107		107
ODRIN TARIM URUNLER							2.3				2.3
PACKDIDEH PRODUCT- ING AND PACKAGING			87.3								87.3
ROOTS COMMOD- ITIES FOR GRAINS TRADING		4.6									4.6

SETA ULUSLAR- ARASI DENİZCİLİK VE TİC							3.9				3.9
TOPRAK URUNLERI KURUMU GELİBOLU	10.3						3.4				13.7
VIVALON AG							11.5				11.5
VTC TARIM URUNLERI GIDA SAN VE TİC LTD STİ							2.9				2.9
WAHBA EGYPT FOR FOOD IN- DUSTRIES		33.2									33.2
YASAM TAHİLİ BİB İTHALAT İHRACAT DEPOLAMA TASİMACI- LIK ACENTE- LIK TİCARET LIMITED SİRKETİ							10.0				10.0
ZULU TRAD- ING LIMITED LLC						6.4					6.4
TO ORDER	3.9	9.5		8.7		6.5	31.0			632	692
Grand Total x1,000 MT	25.2	148	87.3	8.7	52.7	1326	79.5	54.0	107	632	2521

The distribution of grain transportation from Crimea to importing countries.



ENDNOTES

1. See e.g., Roman Neyter, Hryhorii Stolnikovych, and Oleg Nivievskiy, “Agricultural War Damages Review Ukraine: Rapid Damage Assessment,” *KSE Center for Food and Land Use Research*, Jun. 8, 2022, https://kse.ua/wp-content/uploads/2022/06/Damages_report_issue1-1.pdf, last accessed Jan. 11, 2025. PEJ Witness Statements (P010, Jan. 25, 2023; P012, Sep. 30, 2022; P013; P115, Jan. 16, 2024; P128, Jan. 19, 2024; P129, Jan. 16, 2024; and P131, Mar. 3, 2024).
2. An “oblast” in Ukraine, sometimes translated as a “region” or “province,” is the main type of first-level administrative division of the country.
3. Part of Kharkiv Oblast was temporarily occupied in February 2022, but almost all was liberated in November the same year.
4. Notably Chechen “kadyrovtsy” groups, see e.g., “Traitor Dmytro Tabachnyk steals Ukrainian grain, agricultural machinery and develops business in Crimea,” *Television Toronto*, Dec. 19, 2023, <https://torontotv.substack.com/p/4ba>, last accessed May 9, 2024. PEJ Witness Statements (P073, Sep. 30, 2023; P-077, Sep. 25, 2023; and P-079, Sep. 25, 2023).
5. Such as the Novooleksiivskiy elevator. See PEJ Witness Statements (P003, Sep. 8, 2022; P012, Sep. 30, 2022; and P131, Mar. 3, 2024).
6. See generally the reports relating to *The Pillage of Ukrainian agricultural assets: the role of Russian appointed authorities in the occupied districts of Kherson Oblast, Zaporizhzhia Oblast, Luhansk Oblast, Mykolaiv Oblast and Kharkiv Oblast of Ukraine*, published by Project Expedite Justice, between Jun. 2024 and Mar. 2025, <https://www.projectexpeditejustice.org/investigative>.
7. United Nations, Office of the High Commissioner for Human Rights, *Commissions of Inquiry and Fact-Finding Missions on International Human Rights and Humanitarian Law: Guidance and Practice*, HR/PUB/14/7, 2015, p. 62. See Appendix 1 for the methodology applied to establish these standards. https://www.ohchr.org/sites/default/files/Documents/Publications/Col_Guidance_and_Practice.pdf, last accessed Jan. 9, 2025.
8. PEJ uses the term “gray” throughout this report (e.g., “gray hub” and “Russian Gray Grain Fleet”) in reference to the vessels going “dark,” or deliberately hiding their activities, which is widely referred to as a “gray zone” initiative.
9. Confidential communication from PEJ to the PGO on the Voyage of the FEDOR bulk carrier from Feodosia, occupied Crimea, to Lebanon and Syria from Feb. 1, 2024.
10. Confidential communication from PEJ to the PGO and PARC, №10-1162 -22k, from Jul. 8, 2024.
11. Confidential communication from PEJ the PGO and PARC on San Cosmas from Jan. 2024.
12. Confidential communication from PEJ to the PGO and PARC, №10-1149, from Nov. 8, 2023.
13. State Border Service of Ukraine, “За незаконний захід у порти Криму Україна конфіскувала суховантаж” [“Ukraine confiscated dry cargo for illegal entry into the ports of Crimea”], *dpsu.gov.ua*, Oct. 9, 2024, <https://dpsu.gov.ua/ua/news/44365-ukrayina-konfiskovala-suhovantazh-za-nezakonnij-zahid-u-porti->

- [okupovanogo-krimu](#), last accessed Jan. 12, 2025.
14. State Grain Operator (@gupgzo), “Урожай зерна в России в 2023 году составит 146 млн тонн” [“Grain harvest in Russia in 2023 will amount to 146 million tons”], *Telegram*, Dec. 15, 2023, 12:44, <https://t.me/gupgzo/1284>, last accessed Jan. 12, 2025.
 15. Russia’s disclosure practices do not comply with Russian law: see Federal Law of the Russian Federation, No. 282-FZ, Nov. 29, 2007 (as amended on Feb. 28, 2023, 2024), <https://faolex.fao.org/docs/pdf/rus172719.pdf> and <https://cis-legislation.com/document.fwx?rgn=20113> (translated).
 16. “About Us,” *NASA Harvest*, <https://www.nasaharvest.org/about-us>, last accessed Jan. 10, 2025.
 17. “Larger Wheat Harvest in Ukraine Than Expected,” *NASA Earth Observatory*, Dec. 2022, <https://earthobservatory.nasa.gov/images/150590/larger-wheat-harvest-in-ukraine-than-expected>, last accessed Jan. 13, 2025 (“The NASA Harvest team calculated that farmers harvested 26.6 million tons of wheat in 2022 [...]. However, Ukraine does not have access to 22 percent of that wheat in the eastern part of the country due to the war.”).
 18. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 19. Kateryna Jaresko, “Kerch-Samsun: Grain Express In Action,” *Myrotvorets News*, Jun. 19, 2022, <https://myrotvorets.news/kerch-samsun-zernovyi-ekspres-v-dii/>, last accessed Jan. 11, 2025. Kateryna Jaresko, “The Ship ‘Nadezhda’ Is Transporting Grain From Occupied Kerch to Turkey,” *Myrotvorets News*, Jul. 19, 2022, <https://myrotvorets.news/sudno-nadezhda-zdiisniue-perevezennia-z/>, last accessed Jan. 11, 2025.
 20. Iranian importer, PACKDIDEH PRODUCTING AND PACKAGING, received at least 87,300 metric tonnes of supposed Ukrainian agricultural products shipped from Crimea; see PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 21. Yemeni importer, MUROUJ ALRABIE FOODSTU, received at least 107,000 metric tonnes of supposed Ukrainian agricultural products shipped from Crimea; see PEJ, internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 22. Libyan importer, AL MOSANDA AL OULA CO, received at least 52,700 metric tonnes of supposed Ukrainian agricultural products shipped from Crimea; see PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 23. “The Pillage of Ukrainian agricultural assets: the Russian-organized system of agricultural pillage in occupied Zaporizhzhia Oblast, Ukraine,” Project Expedite Justice, Feb. 2025, <https://www.projectexpeditejustice.org/investigative>.
 24. “The Pillage of Ukrainian agricultural assets: the role of Russian appointed authorities in the occupied districts of Kherson Oblast, Ukraine,” Project Expedite Justice, Jun. 2024, <https://www.projectexpeditejustice.org/kherson>.
 25. Proxy companies are enterprises that can be strategically used to disguise involvement in business activities.
 26. According to Russian law, State Unitary Enterprises do not hold ownership but exploit federal or municipal government-held assets, transferring profits to the

- State coffers. See Federal Law of the Russian Federation, No. 161-FZ, Nov. 14, 2002 (as amended on Jun. 4, 2024), <https://faolex.fao.org/docs/pdf/rus40570.pdf> and <https://cis-legislation.com/document.fwx?rgn=3575> (translated).
27. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 28. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 29. 1,190,000 metric tonnes were directed to Sevastopol, 1,620,000 metric tonnes to other parts of Crimea (including Feodosia and Kerch).
 30. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 31. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 32. See generally the reports relating to *The Pillage of Ukrainian agricultural assets: the role of Russian appointed authorities in the occupied districts of Kherson Oblast, Zaporizhzhia Oblast, Luhansk Oblast, Mykolaiv Oblast and Kharkiv Oblast of Ukraine*, published by Project Expedite Justice, between Jun. 2024 and Mar. 2025, <https://www.projectexpeditejustice.org/investigative>.
 33. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 34. **F1569.** Serhiy Starushko, “Скільки зерна вкрали і вивезли росіяни з окупованих портів Маріуполя та Бердянська” [“How much grain was stolen and exported by Russians from the occupied ports of Mariupol and Berdiansk”], *Center for Investigative Journalism*, Jun 6. 2023, <https://investigator.org.ua/ua/publication/255209/>, last accessed Sep. 3, 2024.
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 36. Closer and more convenient ports for export of Russian-origin grain in the Russian Black Sea include Temryuk and Novorossiysk.
 37. PEJ internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.
 38. The legal predecessor of AVAL, the Ukrainian-registered AVLITA LLC company, was subject to sanctions by the EU, “AVLITA Stevedoring Company | Sanctions Finder,” Sanctions-finder.com, 2025, <https://sanctions-finder.com/sanction/4743d2bf-b0aa-452f-9ed5-fce1848b7722/AVLITA%20Stevedoring%20Company?query=eyJxdWVyeSI6IkFWTElUQSJ9>.
 39. USDA Office of the Chief Economist, *World Agricultural Supply and Demand Estimates*, WASDE - 655, Dec. 10, 2024, <https://www.usda.gov/oce/commodity/wasde/wasde1224v2.pdf>, last accessed Jan. 10, 2025.
 40. PEJ, internal data analysis of Russian quarantine and phytosanitary certificates (2023–2025); access can be provided upon request.

41. Council Regulation (EU) No. 833/2014, Concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, 2014 O.J. (L 229); "The Russian Federation, Ukraine, Crimea,," *Sanctions Finder*, <https://sanctions-finder.com/sanction/393061b3-c966-434f-bccd-3e5c78c91743/The%20Russian%20Federat>, last accessed Jan. 12, 2025 ("It is prohibited to provide technical assistance, brokering, construction or engineering services directly relating to infrastructure in the specified territories in the sectors of (1) transport...").
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