

Annex 12.1: Charcoal stockpiles

Figure 1: Satellite imagery of Charcoal stockpiles at Buur Gaabo, 9 July 2017.



Figures 2 and 3: Satellite imagery of northern and southern Kismayo charcoal stockpiles, 24 June 2017.



Annex 12.2.1: Selected cases of sanctions implementation — Bahrain (November 2016)

1. On 22 November 2016, two members of the Monitoring Group, who were in Bahrain for meetings with Combined Maritime Forces (CMF), observed trucks departing Khalifa Bin Salman Port with cargoes of what appeared to be green bags of Somali charcoal (see figure 1). This was consistent with information received from an SEMG source that dhows had been unloading cargoes of Somali charcoal onto trucks for transshipment to Saudi Arabia (see figure 2). It also matched information communicated to the Bahrain authorities in letters from the SEMG dated 24 October 2016, 1 November 2016, and 15 November 2016 regarding the impending arrival of three dhows with a total cargo of 76,000 bags of charcoal loaded in Kismayo and another dhow with a cargo of 30,000 bags of charcoal loaded in Buur Gaabo.
2. On 23 November, two members of the SEMG met with representatives of the General Directorate of Security and Follow Up, Customs Affairs at the Ministry of Interior, Kingdom of Bahrain. The Monitoring Group shared photos taken the previous day of trucks departing Khalifa Bin Salman Port with cargoes of what appeared to be green bags of Somali charcoal. Customs Affairs agreed to provide the SEMG access to Khalifa Bin Salman Port, where a dhow, *Al Hussain*, claiming to be Sri Lankan-flagged with registration 91909, was unloading a cargo of 30,000 bags of suspected Somali charcoal.
3. *Al Hussain* had submitted paperwork claiming the port of departure had been Moroni, Comoros, while the available evidence indicated that *Al Hussain* was most likely an Indian-flagged dhow identified in a 15 November letter from the SEMG, *Al Faizul Barkat*, MNV 1967, which had loaded its cargo of 30,000 bags of charcoal from Buur Gaabo in mid-October (see figure 4).¹ Customs Affairs stopped the unloading of *Al Hussain* and confiscated the remaining cargo of 15,000 bags of charcoal (see figure 3). Customs documentation and dockworker testimony confirmed the other three dhows previously identified by the SEMG's letters to the Bahrain authorities had already docked and unloaded their cargo of Somali charcoal.

Figure 1: Truck departing Khalifa bin Salman Port.



¹Subsequent investigation during 2017 confirmed *Al Hussain*'s Sri Lankan ship registration had been forged.

Figure 2: Saudi Arabia charcoal bag on board Al Hussain.



Figure 3: Crane loading confiscated charcoal cargo.



Figure 4: False Comoros certificate of origin.



Annex 12.2.2: Selected cases of sanctions implementation — United Arab Emirates and Djibouti (November 2016–March 2017)

1. On 29 November 2016, the SEMG wrote to the United Arab Emirates (UAE) regarding a dhow, *Naji*, which had loaded 27,000 bags of charcoal in Buur Gaabo in early November, recently docked at Port Al Hamriya, and was likely to submit a false Djibouti certificate of origin. The UAE replied on 1 December 2016, noting it had partially confiscated the cargo of *Naji*, and providing the SEMG with a copy of a Djibouti certificate of origin (see figure 1). The Monitoring Group wrote to the UAE on 16 December 2016, stating that CMF had provided aerial photos of *Naji* taken near UAE territorial waters on 20 November 2016. The photos matched the description of the dhow and its cargo of distinctive green charcoal bags that had departed Buur Gaabo on 2 November and docked at Port Al Hamriya on 27 November. The SEMG also noted that the consignee, Mohd Ali Shaheen General Trading Co. (L.L.C.), had been previously identified as trafficking in illicit Somali charcoal earlier that year (see S/2016/919, annex 9.4.a).

2. The UAE replied on 5 January 2017, stating that it had received a letter from the Embassy of the Republic of Djibouti to the UAE attesting to the authenticity of *Naji's* paperwork. The SEMG wrote to the UAE on 20 January, acknowledging it had received confirmation from the Djibouti Chamber of Commerce that it had issued the certificate of origin, but that the Monitoring Group remained concerned that this paperwork had been fraudulently obtained. The UAE replied on 3 February 2017, asserting that in the absence of another letter from the SEMG it would release the remaining cargo of *Naji* on 14 February 2017.

3. The SEMG undertook an official mission to the Republic of Djibouti from 20–24 February 2017. Following meetings with senior representatives of the Ministry of Foreign Affairs and International Cooperation, the Djibouti Ports and Free Zone Authority, Customs, and the Chamber of Commerce, the Monitoring Group confirmed that Djibouti had not exported any charcoal during 2016 and 2017 (and fewer than 3,000 bags during 2014 and 2015). The Harbour Master at the Djibouti Ports and Free Zone Authority further confirmed that no dhows with charcoal cargoes, including *Naji*, had arrived at or departed from Djibouti (see figure 2). On 4 November 2016, the Chamber of Commerce had issued to a local company, Abet Enterprise SARL, one certificate of origin for the export of 27,000 bags of charcoal to the UAE (as well as other certificates of origin for the export of charcoal to the Kingdom of Saudi Arabia). However, following the official mission of the Monitoring Group, the Djiboutian authorities have since concluded that these certificates were fraudulently obtained and have suspended the license of the front company, Abet Enterprise SARL (see figure 3).

4. In a letter to the UAE dated 2 March 2017, the SEMG summarized the evidence obtained during its official mission to Djibouti. The SEMG then met with the UAE authorities in Dubai on 23 March 2017, where it presented this evidence proving Djibouti certificates of origin to be false. In response to a request by the SEMG, the UAE authorities provided copies of Djibouti charcoal certificates of origin for 15 dhows that it had already accepted, with a combined cargo of 435,000 bags of charcoal weighing more than 10,000 metric tons. The Djibouti certificates of origin had been attested to by Ambassador Osman M. Darar at the Embassy of the Republic of Djibouti in Abu Dhabi between 4 November 2016 and 7 February 2017, and then submitted to UAE customs for processing. The UAE authorities agreed to cease accepting Djibouti certificates of origin on an interim basis, pending the outcome of their own investigation, including a meeting with Ambassador Darar.

5. The previous day, 22 March 2017, the Monitoring Group had met with Ambassador Darar at his office in Abu Dhabi. The SEMG presented evidence collected from Djibouti authorities during the official mission 20–24 February indicating that Djibouti had not exported any bulk cargoes of charcoal going back to at least 2014, and that the Djibouti certificates of origin from the Chamber of Commerce had been fraudulently obtained. When asked why he had attested to false paperwork, how many certificates of origin he had attested to, and who had brought him the false paperwork, Ambassador Darar directed the SEMG to address its queries through official channels. Accordingly, the Monitoring Group sent a letter to Djibouti on 28 March 2017, requesting information regarding attestation of charcoal certificates of origin by its embassy in Abu Dhabi. This included not only 435,500 bags weighing more than 10,000 metric tons from November 2016 to February 2017, but also charcoal cargoes of more than 2 million bags weighing more than 50,000 metric tons during 2014 and 2015. As of this writing, Djibouti had not replied.

6. SEMG investigations have identified Basheer Khalif Moosa, a Djiboutian national residing in Dubai, as the most likely source of the false Djibouti charcoal paperwork. Previous reporting by the Monitoring Group in 2013 and 2014 had identified Moosa as the primary source of false Djibouti paperwork for Dubai-based charcoal traffickers.² A corporate

² S/2013/413, annex 9.2; and 26, annex 9.4.

registration document issued in 2015 by the Djibouti Office of Industrial and Commercial Property links Bashir Khalif Musse (a.k.a. Basheer Khalif Moosa) to Abet – Shir Enterprise SARL (a.k.a. Abet Enterprise SARL), the front company whose license was suspended in February 2017 by the Djibouti Ministry of Foreign Affairs and International Cooperation for fraudulently obtaining certificates of origin from the Djibouti Chamber of Commerce (see figure 4). In letters to the UAE dated 28 March and 2 June 2017, the SEMG requested an update on any investigation by the UAE authorities into the criminal network responsible for false Djibouti certificates of origin. As of this writing, the UAE had not replied to this request.

7. In the letter to the UAE dated 2 June, the SEMG also reiterated an observation it had initially made at the meeting with the UAE authorities on 23 March: the consignee for 9 out of the 15 dhows with Djibouti charcoal certificates of origin was listed as “Mohd Ali Shaheen Gen Trdg LLC”. Mohd Ali Shaheen General Trading Co. (L.L.C.) was previously identified as the consignee for a dhow possessing false Comoros paperwork, *Raj Milan*, whose cargo of Somali charcoal was seized and sold at public auction by the UAE authorities in 2015.³ Mohd Ali Shaheen General Trading Co. (L.L.C.) was also identified in last year’s report as the consignee for three dhows with false Comoros paperwork for cargoes of Somali charcoal, *Al Zuber*, *Shree Nausad* and *Yasin*.⁴ The cargoes of the latter two dhows were also confiscated and sold at public auction in May 2016. However, despite an evident pattern of sanctions violations, the Monitoring Group remains unaware of any investigation by the UAE authorities into Mohd Ali Shaheen General Trading Co. (L.L.C.).

Figure 1: False Djibouti certificate of origin.



³ S/2015/801, annex 8.3.

⁴ S/2016/919, annex 9.4.a.

Figure 2: Letter from Djibouti Ports and Free Zone Authority.



Figure 3: letter from Djibouti Ministry of Foreign Affairs and International Cooperation.

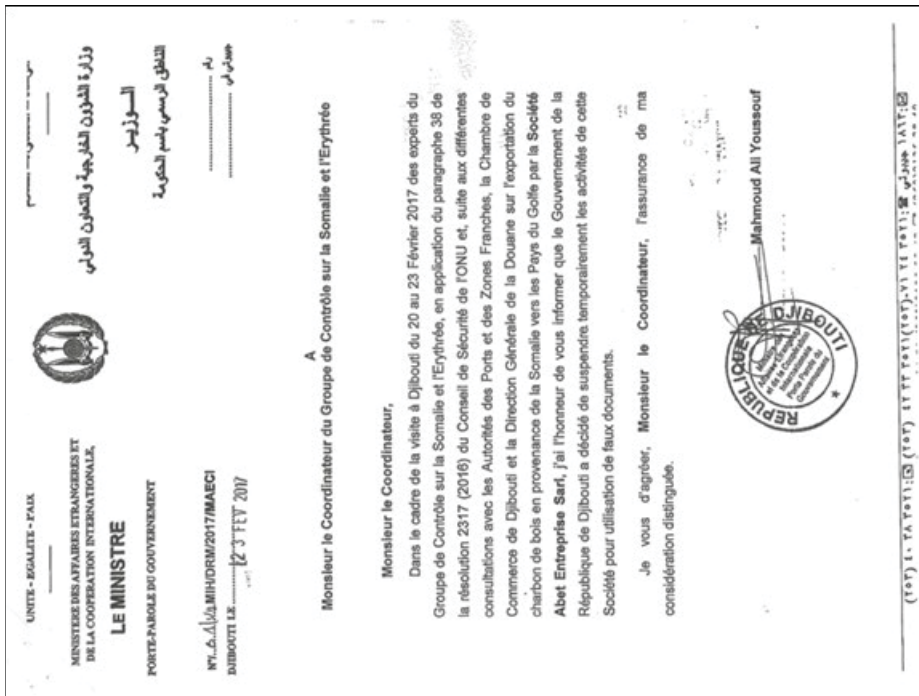


Figure 4: document from Djibouti Office of Industrial and Commercial Property.

L'Office Djiboutien de La Propriété Industrielle et Commerciale (ODPIC) Avis d'immatriculation et de modification aux registres du commerce et des sociétés (RCS) et des Marques.	
<p>Acte rectificatif : Dissolution anticipée Suite au procès-verbal de l'Assemblée Générale Extraordinaire de la société « ABET – SHIR ENTREPRISE » SARL en date du 11/05/2015, dressé et authentifié par Me DIRHAD SAID ALI, les associés de ladite société se sont réunis et ont décidé à l'unanimité :</p> <ul style="list-style-type: none"> - la dissolution anticipée de ladite société. - la nomination de Monsieur BASHIR KHALIF MUSSE en qualité de liquidateur pour une durée de six (6) mois à compter de ce jour. 	<p>Aux termes d'un acte authentique, établi par Me. DIRHAD SAID ALI reçu par l'Office Djiboutien de la Propriété Industrielle et Commerciale (ODPIC), le 31/05/2015 il a été immatriculé sous le N°11765/8/SARL au RCS, une société dont les principales caractéristiques sont les suivantes :</p> <p>Dénomination sociale: «ABET ENTREPRISE» SARL Nom commercial: «ABET ENTREPRISE» Siège social : Djibouti Durée : 99 ans Capital : 1 000 000 FDI</p> <p>Selon la nomenclature provisoire des activités établie par l'ODPIC pour le Registre de Commerce ; Objet : 11[Commerce] Gérant: M.MOHAMED KIFLE AHMED</p>
<p>Acte rectificatif : CESSION DE PARTS SOCIALES/EXTENSION DE L'OBJET Suite à l'avenant aux statuts de la société « GENIUS CONSULTING » SARL du 19/05/2015 authentifié par Me AHMED ABDOURAHMAN CHEIK, il a été décidé les modifications suivantes :</p> <p>CESSION DE PARTS SOCIALES :</p> <p>M. WARSAMA ALI OUMARAR cède et transporte sous les garanties ordinaires et de droits, à M. AMIN ALI ABDI qui accepte 50 PARTS lui appartenant dans ladite société soit 5 000 FDI.</p> <p>• Conséquences sur la répartition des apports et du capital (Article six et sept nouveaux) :</p> <p>M. WARSAMA ALI OUMARAR.....5 000 FDI soit 50 PARTS M. AMIN ALI ABDI.....5 000 FDI soit 50 PARTS</p> <p>EXTENSION DE L'OBJET :</p> <p>« Le développement territorial, l'urbanisme, l'architecture, l'ingénierie, les recherches, les études, les conseils, les enquêtes, les expertises, la cartographie, les levés topographiques, le géomarketing, le I.T, la formation, la conception</p> <p>L'exécution et le suivi des travaux ou des recherches commandités dans les domaines de l'aménagement et de l'habitat.</p> <p>De conseiller les entreprises sur la qualité des états financiers, la viabilité de l'entreprise et l'égalité de traitement accordée aux actionnaires.</p> <p>L'expertise comptable, l'audit, la comptabilité générale, la liquidation, la formation, les conseils divers et les études. Le transport logistique et activités connexes, les travaux publics et privés, le commerce, l'hôtellerie tourisme et restauration, les matériels électroniques électriques bureautiques télécommunications et autres, activités artisanales, automobile et activités connexes, mode tissu et parfumerie, activités immobilières et industrie ».</p>	<p>Aux termes d'un acte sous-seing privé, déposé par Me. FATOUMA MAHAMOUD HASSAN reçu par l'Office Djiboutien de la Propriété Industrielle et Commerciale (ODPIC), le 30/05/2015 il a été immatriculé sous le N°11764/8/SAS au RCS, une société dont les principales caractéristiques sont les suivantes :</p> <p>Dénomination sociale: «AIR DJIBOUTI» SAS Nom commercial: «AIR DJIBOUTI» Siège social : Djibouti Durée : 99 ans Capital : 178 000 000 FDI</p> <p>Selon la nomenclature provisoire des activités établie par l'ODPIC pour le Registre de Commerce ; Objet : 9[Transport, logistique et activités connexes] Président du conseil d'administration: M. ABOUBAKER OMAR HADI</p> <p>N° de dépôt : 140/15 Date : 16/04/2015 Titulaire: DOCTOR'S ASSOCIATES INC. Adresse: 325 Bc Drive, Milford, Ct. 06461 U.S.A. Mandataire: Cabinet d'Avocat WARAB DAUD Marque Mixte:</p> <p>Classe Désignées: 43</p> <p style="text-align: center;">  OFFICE DJIBOUTIEN DE LA PROPRIÉTÉ INDUSTRIELLE ET COMMERCIALE Rue Mohamed Dileta, Plateau de Serpent, Commune de Ras-Dika, Djibouti. BP: 2017 Tel: 00 253 21 35 60 11 Fax: 00253 35 60 92 Site web: www.odpic.info </p>

Annex 12.2.3: Selected cases of sanctions implementation — Kuwait (April 2017–May 2017)

1. On 29 and 30 April 2017, the CMF contacted the Monitoring Group regarding two dhows with cargoes of charcoal that were being held by the Kuwait Coast Guard in Al Doha Port under suspicion of having violated the Somali charcoal ban. The dhows, *Al Sahil* and *Haruni*, possessed paperwork indicating that their charcoal cargo had originated in Djibouti. After reviewing the paperwork, the SEMG advised the CMF and the Kuwait Coast Guard that the certificates of origin were not authentic and that the two dhows were most likely part of a group of twelve dhows that had loaded in Buur Gaabo and Kismayo from late February to early March 2017, and had since been anchored near Port Al Hamriya. This was consistent with information that had been received from a confidential source on 25 April that two dhows with cargoes of Somali charcoal were departing Port Al Hamriya anchorage bound for Kuwait.
2. Subsequent investigation by the Monitoring Group has revealed that the dhows' respective Sri Lankan ship registration documents had also been forged (see figure 1). During an official mission to Sri Lanka, 4-6 May, the Director General of Merchant Shipping for Sri Lanka provided evidence to the Monitoring Group indicating that the Sri Lankan ship registrations for *Al Sahil* and *Haruni* are forgeries. *Al Sahil* and *Haruni* do not appear within the official Sri Lankan ship registry, nor did their ship registration forms and accompanying stamps match originals provided by the Sri Lanka authorities.
3. The SEMG travelled to Kuwait on official mission 22-26 May. The SEMG had several meetings with the Kuwait authorities, including the coast guard and customs, inspected *Al Sahil* and *Haruni* and their cargoes of Somali charcoal, and interviewed the captains of the dhows (see figure 2). The Monitoring Group would like to acknowledge the excellent cooperation of the Kuwait authorities as well as the facilitation of information sharing by Combined Task Force 152 at CMF.
4. Interviews with the dhows' captains indicated *Al Sahil* had been loaded with 28,500 Djibouti-marked bags of charcoal in Buur Gaabo in mid-March 2017 and *Haruni* had been loaded with 17,350 Djibouti-marked bags of charcoal in Kismayo in early March. Both dhows proceeded to Port Al Hamriya anchorage, where they remained for several weeks until receiving false Djibouti paperwork delivered by a contact person, who also gave instructions for the dhows to proceed to Kuwait, where they arrived at Al Doha Port on 29 and 30 April. The SEMG corroborated the captains' testimony regarding the course of each dhow through referencing the data on the dhows' GPS devices. Upon arrival, the Kuwait authorities soon thereafter seized the dhows and their cargo and detained the crews. The loading of Djibouti-marked charcoal bags in Buur Gaabo and Kismayo (see figures 3 and 4) and the provision of false Djibouti paperwork while the dhows were anchored near Dubai suggest a vertically integrated criminal network with accomplices within both Somalia and the UAE.
5. On 13 August, at the CMF headquarters in Bahrain, a representative of the Kuwait Coast Guard updated the Monitoring Group. The charcoal cargoes of *Al Sahil* and *Haruni* have been confiscated by Customs and stored at a warehouse at the port. The dhows are in the custody of the Kuwait authorities and the captains have been charged and released on bail, pending completion of a criminal prosecution under Kuwaiti domestic law. The Monitoring Group would like to highlight the proactive stance toward sanctions implementation taken by the Kuwait authorities, setting a useful precedent for the region.

Figure 1: False Sri Lanka ship registration.

CALL SIGN-SLK12

Ring Form No.6

CERTIFICATE OF SRI LANKA REGISTRY PARTICULARS OF SHIP

SRI LANKA REGISTRY

Office Number 1000514	Name of Ship BARONZ	No. Year and port of registry INDIA	Name and Address of Builders INDIA	Vessel No. INDIA	Name and Address of Builders INDIA																				
Whether a sailing vessel or motor ship INDIA		Whether built INDIA		Whether built INDIA																					
<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <th colspan="3">PARTICULARS OF PROPPELLING ENGINES, A.C. (IF ANY), AS REGISTERED IN BOOKS, Owners Engine Makers</th> <th colspan="3">S. H. P. Estimated of 1991</th> </tr> <tr> <th>No. of Engines</th> <th>Description of Engines</th> <th>Name and Address of Builders</th> <th>No. of cylinders of each set</th> <th>Diameter of cylinders</th> <th>No. of cylinders in each set</th> <th>Power in H.P.</th> </tr> <tr> <td>2</td> <td>CUMMINS</td> <td>CUMMINS</td> <td>6</td> <td>6</td> <td>6</td> <td>650 HP</td> </tr> </table>						PARTICULARS OF PROPPELLING ENGINES, A.C. (IF ANY), AS REGISTERED IN BOOKS, Owners Engine Makers			S. H. P. Estimated of 1991			No. of Engines	Description of Engines	Name and Address of Builders	No. of cylinders of each set	Diameter of cylinders	No. of cylinders in each set	Power in H.P.	2	CUMMINS	CUMMINS	6	6	6	650 HP
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<p>The undersigned, Registry of Sri Lanka Ship at the port of COLOMBO hereby certifies that this Description of which is preferred in this is my Certificate. Has been duly surveyed, and the above Description is in accordance with the register Book, that the ship is a sailing vessel, and is entitled to the protection of the laws of Sri Lanka.</p> <p>Witness my hand and seal of Office in Colombo, this _____ day of _____ 2013.</p> <p>Name, Residence and Occupation of the owner PAJESH POPATIAL THACKER INDIA</p>																									

Figure 2: Al Sahil at Doha Port.



Figure 3: Djibouti charcoal bag from Al Sahil.



Figure 4: Djibouti charcoal bag from Haruni.



Annex 12.2.4: Selected cases of sanctions implementation — United Arab Emirates (June 2017–August 2017)

1. On 27 June 2017, the SEMG contacted the CMF regarding four dhows departing from Kismayo with a total cargo of 101,000 bags that had been loaded in Kismayo on 23 and 24 June. On 30 June, SEMG contacted the CMF regarding a fifth dhow that had loaded 40,000 bags in Buur Gaabo on 28 June. SEMG estimated the location of the first four dhows to be on the Somalia coastline somewhere between Hobyo and Eyl, with their course set through the Strait of Socotra and onward to Port Al Hamriya. The SEMG also noted that based on a recent official mission to Kismayo and Buur Gaabo, where the charcoal stockpiles had been observed, the dhow cargoes would be comprised of typically green charcoal bags. The CMF was also informed that should there be an opportunity for maritime interdiction, the dhows may possess a false ship registration but likely no paperwork regarding their illicit cargo, as this would be received from charcoal traffickers at Port Al Hamriya anchorage. On 1 July, the CMF informed the SEMG that “contacts of interest” matching the description of the dhows with charcoal cargoes had been identified and were being tracked.

2. On 6 July, the Monitoring Group wrote to the UAE regarding the impending arrival of five dhows with a total cargo of 141,000 bags of charcoal from Somalia. The SEMG noted that checkpoint taxation in Somalia by Al-Shabaab at a rate of \$2.50 per bag likely generated at least \$350,000 in income for the armed group. The UAE was informed that the CMF was tracking the five dhows and their anticipated destination was Port Al Hamriya anchorage. The letter further explained that the names and registrations of the dhows would be altered, so the best way to identify them would be through reference to the size of their cargo and the type of charcoal bags coming from Kismayo and Buur Gaabo — a distinctive green colour with possible markings of “Bay and Bakool” or the image of a palm tree (see figure 1). The Monitoring Group also noted that the dhows may attempt to dock with false Côte d’Ivoire paperwork and requested copies of all Côte d’Ivoire certificates of origin submitted since April 2017 — when the UAE stopped taking false Djibouti certificates of origin.

3. The CMF subsequently located at Port Al Hamriya anchorage — within the territorial waters of the UAE — the five dhows it had tracked *en route* from Somalia, through the Strait of Socotra, and along the Yemen and Oman coastlines (see annex 12.2.5, strictly confidential). On more than a dozen distinct occasions between 14 July and 22 August, detailed information was communicated from the CMF to the UAE authorities regarding these dhows in anticipation that they would take sanctions enforcement action.⁵ The lines of communication to the UAE authorities included via the US Naval Forces Central Command (NAVCENT), the US Naval Criminal Investigative Service (NCIS), and the US Defence Attaché to the UAE. The UAE authorities that were regularly notified regarding these dhows included the UAE Coast Guard, UAE Navy, UAE Federal Customs Authority, and the Dubai Police. Initially, the information shared included descriptions of the dhows and their cargoes, plus their precise geographic locations; subsequently, this was expanded to sharing more detailed reports, including imagery and analysis.

4. Meanwhile, events at Port Al Hamriya anchorage seemed to indicate that the charcoal traffickers had become aware that the UAE authorities had been notified and that the CMF was tracking the dhows, as had been indicated in the SEMG’s confidential letter dated 6 July. On 6 August, the UAE replied to the SEMG’s letter of 6 July, stating the relevant customs authorities had been informed and requesting the registrations of the five dhows, despite the Monitoring Group already having indicated that the charcoal traffickers would utilize fake names and registrations for the dhows. That same day, the CMF aerial surveillance documented dhows which had been tracked from near the Somalia coastline transferring their cargo of charcoal onto other dhows while anchored within UAE territorial waters (see annex 12.2.5, strictly confidential). Despite having received detailed real-time information from the CMF on more than a dozen occasions, the UAE Coast Guard, which had the jurisdiction to take enforcement action, failed to board and inspect the dhows at Port Al Hamriya anchorage.

5. On 25 August 2017, the UAE wrote to the Monitoring Group regarding two dhows, *Maha* (registration SL301240) and *Ola* (registration 9330112), suspected of violating the Somali charcoal ban. Their respective cargoes consisted of 10,320 bags and 26,470 bags. The UAE provided copies of Ghana certificates of origin, invoices, packing lists, and supporting documents from Ghana authorities in Accra and at the Ghana Consulate General in Dubai (see figure 2). On 29 August, the Monitoring Group replied to the UAE, noting the following points:

- the shipping company identified on the paperwork, “Sea Shore Marine Services Limited”, is not listed on the registry of licensed charcoal exporters from Ghana;

⁵ Email from a senior officer at CMF, 22 August 2017.

- the consignee, Salim Al Khattal Group Marine Contracting & Trading LLC, has previously traded in illicit Somali charcoal using false Ghana paperwork (see S/2016/919, annex 9.4.b);
- the stamp of the notary public which appears on the certificates of origin and legal declarations is the same stamp previously used on false Ghana paperwork during 2016 (S/2016/919, annex 9.7.c); and
- the SEMG believes that the charcoal aboard *Maha* and *Ola* was transported to Port Al Hamriya anchorage aboard one of the dhows identified in its letter of 6 July before being transferred to these dhows in an attempt at sanctions evasion.

6. The Monitoring Group recommended that the cargoes of *Maha* and *Ola* not be released to the consignee and that the UAE authorities consider confiscation of the total cargo of 36,790 bags of charcoal. At the time of writing, a reply from the UAE remains pending.

Figure 1: Green bags of charcoal with palm tree logo at Kismayo stockpile.



Figure 2: False Ghana certificate of origin.

Goods consigned from Exporter's business name, address, country SHORE MARINE SERVICES LIMITED (GHANA)		Reference No: 104642 GENERALISED SYSTEM OF PREFERENCES CERTIFICATE OF ORIGIN FORM A Issued in: GHANA (Country) See Notes overleaf	
Goods consigned to Consignee's name, address, country NEW AL KHATTAL GROUP MARINE CONTRACTING & TRADING (SALIM AL KHATTAL GROUP MARINE CONTRACTING & TRADING) AT NEW TRADING (OMAN)		4. For official use	
Means of transport and route (as far as known) BY SEA, "OLA" (9330112)		10. Number and date of invoices B/L NO SSMS2098	
6. Marks and numbers of packages 26470 BAGS OF CHARCOAL		9. Gross weight or number of packages 661750 KGS	
7. Number and kind of packages, description of goods 26470 BAGS OF CHARCOAL		8. Origin criterion (see Notes overleaf) "P"	
1. Certification It is hereby certified, on the basis of control carried out, that the declaration by the exporter is correct.		12. Declaration by the exporter The undersigned hereby declares that the above information is true and correct; that all the goods were produced in GHANA (country) and that they comply with the origin requirements specified for these goods in the Generalised System of Preferences for goods exported to UAE (Importing Country)	
Place and date, signature and stamp of certifying authority TEMA: 13/07/17 (Signature) (Stamp) (Signature) (Stamp)		Place and date, signature of authorized signatory TEMA: 13/07/17 (Signature) (Stamp)	

**Annex 12.2.5: Charcoal dhows at Port Al Hamriya anchorage, Dubai, UAE
(STRICTLY CONFIDENTIAL)***