

July 22, 2013

Rudolf Schepers
Reederei Rudolf Schepers GmbH & Co KG
Hermann-Ehlers-Strasse 5B
26160 Bad Zwischenahn/Ofen
Germany

Re: Reederei Rudolf Schepers GmbH & Co KG and Iran

Dear Mr. Schepers:

On behalf of United Against Nuclear Iran (“UANI”), I am writing to you to express my concerns about the apparent calling of Reederei Rudolf Schepers GmbH & Co KG’s (“Reederei Rudolf Schepers”) vessel “TS Jakarta” (IMO 9383223)¹ at Iranian ports that appear to be operated by sanctioned entities under recent European and U.S. legislation.² The international community has become increasingly concerned by the regime’s refusal to comply with demands to alleviate concerns about its possible pursuit of nuclear weapons. In the framework of the ongoing diplomatic effort between the P5+1 and Iran, the international sanctions regime and its effective implementation play a crucial role as a means of leverage for international negotiators. Therefore, we would like to share with you our concerns about the apparently ongoing interaction between your vessel, the “TS Jakarta” (IMO 9383223) and port authorities that appear to be closely affiliated with Tidewater Middle East Co., a U.S. and EU sanctioned Iranian entity.

The container ship “TS Jakarta” (IMO: 9383223) which is group-owned and managed by Reederei Rudolf Schepers and directly owned by Rudolf Schepers subsidiary Anna-S, appears to have visited ports reportedly operated by Tidewater Middle East Co.³ Tidewater Middle East Co. was sanctioned by the EU and U.S. due to its connection to the Iranian Islamic Revolutionary Guard Corps (“IRGC”). The IRGC itself is sanctioned by the EU and is designated as an entity of proliferation concern by the U.S.⁴ Thus by continuing its interaction with this Iranian port management authority, Reederei Rudolf Schepers could be in danger of inadvertently violating EU sanctions. Any payments to Tidewater Middle East

¹ Of which Reederei Rudolf Schepers is the registered agent to the owner and manager (IMO company number: 1616496) according to equasis.org, see appendix 1

² <http://www.treasury.gov/press-center/press-releases/Pages/tg1217.aspx> [accessed on: 16.01.2013]
http://www.hm-treasury.gov.uk/d/fin_sanc_public_notice_reg54_56_240112.pdf [accessed on: 16.04.2013]

³ <http://www.treasury.gov/press-center/press-releases/Pages/tg1217.aspx> [accessed on: 16.04.2013]

⁴ EU Council Regulation No 961/2010 of 25 October 2010
<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2010:281:0001:0077:EN:PDF> [accessed on: 13.06.2013]

US Department of State Executive Order 13382

<http://2001-2009.state.gov/r/pa/prs/ps/2007/oct/94193.htm> [accessed on 13.06.2013]

N.B. the U.S. Treasury Department also designated the IRGC’s elite Quds Force as a terrorism supporting entity under Executive Order 13224

Co. are prohibited under aforementioned sanctions.⁵ As part of UANI's general campaign, we encourage Reederei Rudolf Schepers to consider abandoning its alleged interaction with sanctioned Iranian entities in order to avoid any further reputational damage derived from its ostensible commercial activities there.

Although Reederei Rudolf Schepers' operations in Iran are ostensibly civilian, private sector interactions, we have a number of reservations with such alleged ongoing cooperation. In particular we are concerned about the following elements of your interaction with Iranian entities, which are notably corroborated by different open source ship monitoring websites themselves based on vast amounts of Automatic Identification Systems (AIS) data:

- According to the website Fleetmon.com, "TS Jakarta" (IMO: 9383223) has been calling at Bandar Abbas and Bandar E-Shahid Reajie ports repeatedly between September 2012 and June 2013, spending over 36 hours in the Bandar E- Shahid Reajie port area as recently as 5/9/2013 - 11.05.2013⁶.
- The website Fleetmon.com showed "TS Jakarta" (IMO: 9383223) indicated Bandar Abbas as its last destination on 12/11/2012⁷.
- The website marinetraffic.com showed that "TS Jakarta" (IMO: 9383223) indicated Bandar Abbas as its next destination via AIS on 6/25/2013⁸.

Furthermore, Reederei Rudolf Schepers, as the registered agent to the owner and manager of vessel "TS Jakarta" (IMO: 9383223) should be aware of the risks involved in permitting the vessels to call at Iranian ports and not exercising due diligence in verifying the nature of cargo, cargo interests, charterer, port agents and port operators. By allowing one of its vessels to call at Iranian ports, Reederei Rudolf Schepers might find itself in breach of European sanctions and, simultaneously, be in danger of inadvertently helping Iran to circumvent the multilateral sanctions that have been imposed to prevent the country from further developing its possible nuclear weapons program and to motivate it to improve its human rights record.

In light of these concerns, UANI calls upon Reederei Rudolf Schepers to follow the lead of other multinational companies, such as Maersk Line,⁹ and end port calls of its vessels to Iran. We are convinced that such behaviour is the only responsible course of action in the current circumstances. Without wide ranging cooperation from the private business community, it is impossible to maintain and increase the fiscal and economic pressure on the Iranian regime, which continues to advance its nuclear program. The sanctions imposed on Iran by the U.S. and the EU as well as a host of other nations at the beginning of 2012 were one of the central factors which motivated Iran to return to the negotiating table after a 15 month hiatus. Increasing the economic pressure on the regime is the best chance to motivate Iran to agree to concrete concessions that can pave the way to a peaceful resolution of the conflict. If the current negotiations do not lead to a compromise that halts Iran's nuclear activities, the Persian Gulf is in danger of fundamentally destabilizing over the long term.

⁵ <http://www.hfw.com/publications/client-briefings/iran-sanctions-iranian-ports-operator-designated> [accessed on: 16.04.2013]

⁶ See appendix 2

⁷ See appendix 3

⁸ See appendix 4

⁹ <http://www.bbc.co.uk/news/business-19888998> [accessed on: 16.04.2013]

These tensions might ultimately lead to war, which will wipe out any commercial interests that companies such as Reederei Rudolf Schepers hold in the wider Middle East. Therefore, a planned and organized cessation of your company's vessels' port calls to Iranian ports may be the appropriate and prudent long-term business strategy.

Please let us hear from you by August 1, 2013 about Reederei Rudolf Schepers' intentions with respect to its business in Iran. We look forward to your response.

Thank you for your immediate attention to this matter.

Very truly yours,

A handwritten signature in black ink, appearing to read "Mark Wallace". The signature is fluid and cursive, with the first name "Mark" and last name "Wallace" clearly distinguishable.

Ambassador Mark D. Wallace

Appendices

Appendix 1: Ownership structure of TS Jakarta (equasis.org) [accessed on: 28.06.2013]

The screenshot shows the Equasis website interface for the ship TS JAKARTA. The top section displays key information:

- IMO number:** 9382223
- Name of ship:** TS JAKARTA (since 01/09/2009)
- Call Sign:** V2CS2
- MMSI:** 305091000
- Gross tonnage:** 26435 (since 01/03/2008)
- DWT:** 34362 (since 01/03/2008)
- Type of ship:** Container Ship (since 01/03/2008)
- Year of build:** 2008
- Flag:** Antigua and Barbuda (since 01/03/2008)
- Status of ship:** In Service/Commission (since 25/03/2008)
- Last update:** 23/04/2013

Below this, there is an 'OVERVIEW' section with a table of compliance status:

Overview	Value
The ship is classed by (at least) one of the IACS member societies	No
The ship's flag is not on the black list of the Paris MoU	Yes
The ship's flag is on the white list of the Paris MoU	Yes
The ship's flag is not on the black list of the Tokyo MoU	Yes
The ship's flag is on the white list of the Tokyo MoU	Yes
Percentage of inspections having led to a detention in last 36 months	0.0 %
The ship's flag is not on the targeted list of the USCG	Yes

The 'MANAGEMENT DETAIL' section lists the following roles and companies:

IMO number	Role	Name of company	Address	Date of effect	Details
1616498	ISM Manager	SCHEPERS GMBH	Hermann-Ehlers-Strasse 5B, Ofen, 26160 Bad Zwischenahn, Germany.	since 20/09/2008	
1616498	Ship manager	SCHEPERS GMBH	Hermann-Ehlers-Strasse 5B, Ofen, 26160 Bad Zwischenahn, Germany.	since 25/03/2008	
4123431	Registered owner	ANNA S	Care of Reederei Rudolf Schepers GmbH & Co KG (Reederei Schepers), Hermann-Ehlers-Strasse 5B, Ofen, 26160 Bad Zwischenahn, Germany.	since 25/03/2008	

Appendix 2:

The screenshot shows the FleetMon website interface for the ship TS JAKARTA. The 'PORT CALL LOG' section displays a table of port calls:

PORT	ACTUAL TIME OF ARRIVAL GMT	ACTUAL TIME OF DEPARTURE GMT	TIME IN PORT AREA
Bandar Abbas	2012-12-11 10:00 GMT	2012-12-11 12:00 GMT	2 h
Jebel Ali	2012-11-25 22:38 GMT	2012-12-10 21:00 GMT	14d 22 h
Mumbai (Bombay)	2012-11-19 13:00 GMT	2012-11-20 19:15 GMT	1d 6 h
Jebel Ali	2012-10-29 07:45 GMT	2012-11-13 14:43 GMT	15d 6 h
Jebel Ali	2012-10-04 05:03 BST	2012-10-16 05:52 BST	12d
Dubai	2012-10-03 18:38 BST	2012-10-04 00:20 BST	5 h
Jebel Ali	2012-10-03 13:27 BST	2012-10-03 16:03 BST	2 h
Bandar-E Shahid Reajie	2012-09-20 16:28 BST	2012-09-22 21:46 BST	2d 5 h
Jazireh-Ye Hormoz	2012-09-20 08:41 BST	2012-09-20 10:08 BST	1 h
Jebel Ali	2012-09-18 01:05 BST	2012-09-18 22:51 BST	21 h

Information from different sources may contradict each other. FleetMon does not sort out contradictory information to allow you to make your own informed decision.

Information sources: AIS - Information derived from ship signals; LS - Linescape container vessel schedules

This list is restricted to data of the last three months. To get access to more data, consider upgrading your account! **UPGRADE**

www.fleetmon.com/en/vessels/Ts_Jakarta_2014168

FleetMon VESSELS PORTS SHIPPING COMMUNITY ABOUT

TS JAKARTA FM X mhhouse Unlimited

Search: all flags

PORT	ACTUAL TIME OF ARRIVAL	ACTUAL TIME OF DEPARTURE	TIME IN PORT AREA
Bandar-E Shahid Reajie	2013-06-26 16:25 EDT	2013-06-27 05:55 EDT	13h
Jazireh-Ye Hormoz	2013-06-25 17:28 EDT	2013-06-25 20:04 EDT	2h
Bandar Abbas	2013-06-25 12:28 EDT	2013-06-25 16:40 EDT	4h
Hong Kong	2013-06-04 03:13 EDT	2013-06-06 11:17 EDT	2d 8h
Beilun	2013-05-31 12:51 EDT	2013-05-31 23:12 EDT	10h
Zhoushan	2013-05-30 17:31 EDT	2013-05-31 08:32 EDT	15h
Port of Shanghai	2013-05-29 19:01 EDT	2013-05-30 05:08 EDT	10h
Hong Kong	2013-05-26 14:01 EDT	2013-05-27 05:25 EDT	15h
Bandar-E Shahid Reajie	2013-05-09 10:55 EDT	2013-05-11 03:34 EDT	1d 16h
Bandar Abbas	2013-05-09 03:56 EDT	2013-05-09 05:29 EDT	1h
Jebel Ali	2013-05-07 05:39 EDT	2013-05-08 11:02 EDT	1d 5h
Port of Shekou	2013-04-19 21:24 EDT	2013-04-20 04:46 EDT	7h
Hong Kong	2013-04-18 11:01 EDT	2013-04-19 18:19 EDT	1d 7h
Beilun	2013-04-15 13:32 EDT	2013-04-16 02:59 EDT	13h
Lu-hua Shan	2013-04-14 18:54 EDT	2013-04-15 00:39 EDT	5h
Port of Shanghai	2013-04-14 00:41 EDT	2013-04-14 13:53 EDT	13h
Hong Kong	2013-04-08 23:40 EDT	2013-04-11 09:43 EDT	2d 10h
Bandar-E Shahid Reajie	2013-03-23 19:23 EDT	2013-03-24 21:40 EDT	1d 2h
Bandar Abbas	2013-03-22 06:37 EDT	2013-03-23 12:13 EDT	1d 5h
Jebel Ali	2013-03-19 09:12 EDT	2013-03-21 03:01 EDT	1d 17h

Feedback for FleetMon.com

Appendix 3:

www.fleetmon.com/en/vessels/Ts_Jakarta_2014168

FleetMon VESSELS PORTS SHIPPING COMMUNITY ABOUT

TS JAKARTA FM X hpfeil Pro

VOYAGE INFORMATION

COURSE SE KN 0.2 ETA 2012-12-11 10:00 GMT DESTINATION: BANDAR ABBAS

MARITIME AREA: Persian Gulf (IR EEZ)
 NAV. STATUS: at anchor
 LAST POSITION RECEIVED: 2012-12-11 12:26 GMT
 NEAREST PORT: Bandar Abbas (IR), 12 km
 LAST KNOWN PORT: Bandar Abbas (IR)
 TYPE OF CARGO: —

show live in FM Explorer

LAST POSITION RECEIVED 2.4 LAT: 27° 02' N LONG: 56° 14' E

Appendix 4:


Windows taskbar: Windward, Equasis - Ship search - Resu..., TS JAKARTA (Container ship), TS JAKARTA - Vessel's Detail

Browser: www.marinetraffic.com/ais/shipdetails.aspx?MMSI=305091000

TS JAKARTA

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Vessel's Details

Ship Type: Container ship
Year Built: 2008
Length x Breadth: 209 m X 30 m
Gross Tonnage: 26435, DeadWeight: 34362 t
Speed recorded (Max / Average): 11.7 / 8.7 knots
Flag: Antigua Barbuda [AG] 
Call Sign: VZCS2
IMO: 9383223, MMSI: 305091000

Last Position Received

Area: Oman Gulf
Latitude / Longitude: [27.1063° / 56.0688° \(Map\)](#)
Speed/Course: 0 knots / 153°
Currently in Port: [BAJAEI PORT](#)
Info Received: 0d 0h 9min ago (AIS Source: 49)

[Current Vessel's Track](#)

Wind: 8 knots, 171°, 36°C

Itineraries History


Voyage Related Info (Last Received)

Draught: 10.9 m
Destination: BANDAR ABBAS
ETA: 2013-06-25 05:00
Info Received: 2013-06-27 08:43 (0d, 2h 13min ago)

Recent Port Calls:

No Records Found

Ex Names History



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MarineTraffic.com
Ship Photos: 4
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Windows taskbar: start, Inbox - ew@strategi..., Microsoft Excel - 13-0..., TS JAKARTA - Vessel..., Fleetmtr print screens, TS JAKARTA 938322..., EN, 11:57