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A Safe Corridor No One Has Checked

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In September two decisions drew a safe passage through Georgian waters. London war risk underwriters extended their listed area to almost the entire Black Sea but left Georgia's territorial waters outside it, and a Turkish draft would route one of two protected shipping corridors through the same waters. Both rely on Georgian jurisdiction. EU instruments, by contrast, treat the Georgian coast as a question of the government's political will. Port state control data for 2025 show Georgian inspectors recording markedly fewer deficiencies and detentions than those of Bulgaria, Romania and Turkey. Whether this reflects a lack of will or a lack of capacity determines which instruments can work, and the Union has not, as far as can be established, examined the question.

1. WHAT HAS HAPPENED

On 16 September the Joint War Committee of the London marine insurance market issued Circular JWLA-035. It extends the listed war risk area from the northern Black Sea to almost the entire basin and excludes only the territorial waters of Turkey, Romania, Bulgaria and Georgia. Vessels that remain within those waters need no additional war risk cover.[1]

The following day a Turkish diplomat told Agence France-Presse that Ankara had sent Russia and Ukraine a draft memorandum on the protection of civilian shipping. In his account it provides for a western corridor along the Romanian and Bulgarian coasts and an eastern one through the territorial waters of Turkey and Georgia, should Georgia wish to take part. Other reports describe the two routes as separated by destination, with the eastern route reserved for ships bound for Russia. The draft is not final. If the second account proves correct, Russia-bound traffic would be channelled through Georgian waters.[2]

Researchers at the Serious Organised Crime and Anti-Corruption Evidence (SOC ACE) programme of the University of Birmingham counted calls at Poti by ships arriving from occupied Ukrainian ports: 22 in the second half of 2023, 68 in 2024 and 145 in the first half of 2025 alone. The authors state that they cannot determine whether this reflects a deliberate opening or the path of least resistance.[3]

One deadline has already passed. By 25 October the Commission was to report to the Council on whether the listing of the Kulevi refinery should be maintained. Unless the listing is lifted, the transaction ban takes effect on 25 January 2027.[4]

2. WHAT THIS MEANS

The September decisions assume that a coastal state controls its waters and answers for what passes through them. EU instruments start from a different premise. The Black Sea strategy of May 2025 ties further engagement with Georgia, including the accession process, to a return to the EU path.[5] The implementation

report of July 2026 names Turkey, Ukraine and Moldova as intended partners of the Maritime Security Hub and makes any role for Georgia conditional on concrete steps by the authorities.[6] Georgia appears, in short, as a question of political will.

No sanctions authority measures what that will produces at sea. The closest comparable indicator is port state control, which checks foreign vessels against safety, environmental and labour conventions rather than sanctions, but reflects the capacity of the administration that would carry any enforcement. In 2025 Georgia detained eight ships in 422 inspections, a rate of 1.9 per cent, against 7.3 per cent in Bulgaria and 9.6 per cent in Romania (Table 1). Georgia's rate has risen since 2023, yet the gap to its EU neighbours has widened. Other indicators do not depend on the small number of detentions. Georgian inspectors found deficiencies in 56 per cent of inspections, against 70 per cent across the region, and recorded on average 2.2 deficiencies per inspection, against 4.3. They registered roughly one deficiency serious enough to justify detention for every eight inspections, compared with three for every five in Bulgaria and six for every seven in Romania.[7]

Table 1. Port state control in the Black Sea region, 2025 and 2023

AUTHORITY	INSPECTIONS 2025	DETENTIONS 2025	DETENTION RATE 2025 (%)	DETENTION RATE 2023 (%)
Bulgaria	344	25	7.27	4.30
Georgia	422	8	1.90	0.50
Romania	595	57	9.58	5.86
Russian Federation	1,627	136	8.36	6.59
Turkey	569	121	21.27	2.92
Ukraine	1,560	0	0.00	0.00
Region	**5,117**	**347**	**6.78**	**3.93**

Detention rate: detentions per 100 inspections. Source: Black Sea MoU, annual reports (note 7).

Four explanations are possible, and they are not mutually exclusive. Deficiencies may be found but not pursued, which would be a matter of will. Inspectors may look and find little, which would point to gaps in training, equipment and powers. The fleet calling at Georgian ports may be younger or better classed. Finally, the selection of ships may matter. Georgia inspected 62 per cent of the individual ships calling at its ports, against around 27 per cent in Bulgaria and Romania, and coverage this broad inevitably includes many low-risk vessels. Such coverage is itself evidence of administrative activity rather than its absence. Because the report does not break down fleets by age and flag, the data alone cannot settle the question.

Which explanation applies determines which instruments can work. If the problem is will, listings, visa measures and individual sanctions are the appropriate tools. If it is capacity, what matters is inspector training, technical assistance and access to the data held under the Paris MoU and by the European Maritime Safety Agency. European policy rests on the first reading, and no EU assessment of the second could be identified. The Baltic shows that the second question can be asked. Since early 2025 Denmark and Sweden have checked tankers for fire safety, insurance cover and voyage plans.[8] Both act within EU sanctions that do not bind Georgia, yet the checks themselves rest on coastal and port state rights that Georgia shares.

The material for such an assessment exists, largely outside the EU institutions. The Centre for Research on Energy and Clean Air reports that the Kulevi refinery drew all of its crude from Russia after its commissioning

in October 2025, and that the ports of Kulevi and Batumi shipped fuels worth around €1.2 billion and suspected of containing Russian oil to sanctioning jurisdictions over three years.[9] The government, for its part, undertook in March 2026 to keep shadow fleet tankers out of its ports and turned one away, assurances the Union accepted when it dropped the Kulevi terminal from its 20th sanctions package.[10] Whether such commitments hold is what independent monitoring would have to establish. Yet since March 2026 the receipt of foreign grants without government consent has been a criminal offence, which narrows the space for the Georgian investigators who have supplied much of the evidence so far.[11]

The calls at Poti fit this picture. They have multiplied within two years, they originate in ports under Russian occupation, and they coincide with unusually few port state control findings. Transport corridors follow costs and can shift within a few years. Jurisdiction over territorial waters does not. The route that insurers and Ankara have drawn through Georgian waters is therefore likely to outlast the current debate over overland connections through the South Caucasus.

3. WHAT TO WATCH

Four processes will shape the coming weeks. One has been decided, three remain open.

Kulevi. The Commission's report was due on 25 October and had not been published by the end of the month. The operator states that the refinery no longer processes Russian crude and has requested delisting, a claim that has not been independently verified.[4]

The visa mechanism. The suspension of visa-free travel for holders of Georgian diplomatic, service and official passports runs until 6 March 2027.[12] If the circumstances persist, the Commission is to extend it by early January 2027 for 24 months, in principle to all Georgian nationals, although it may limit the extension to specific categories.[13]

Anaklia. On 21 October a World Bank-financed call was published for the supervision of the 18-kilometre rail link to the port, not for its construction, which has yet to be tendered.[14] The port's 2026 allocation fell from 153 to 53 million lari between budget drafts. The government cites lower costs and a reduced scope, including a shorter breakwater.[15]

TRIPP. The Armenian parliament ratified the framework agreement on 28 October by 63 votes to 32. The constitutional change that Baku demands before a peace treaty remains open, since the ruling party lacks the two-thirds majority needed to put a new constitution to referendum. The border between Akyaka and Gyumri remains closed.[16]

Three indicators can be followed in published sources: the next Black Sea MoU annual report, which will show whether Georgian inspection results move towards the regional pattern; the opening of the transit and customs hub at Gali, reported as all but complete in December 2025;[17] and a Georgian decision on the eastern route in the Turkish draft.[2]

NOTES

1 Joint War Committee, Circular JWLA-035, JWC Listed Areas, 16 September 2026, summarised by Ambrey, 23 September 2026, https://ambrey.com/operations/event/jwla-035-why-the-whole-black-sea-is-now-a-listed-area/. Circulars are published by the Lloyd's Market Association at lmalloyds.com. The previous definition (JWLA-033, 3 March 2026) covered only the northern Black Sea, ending in the east at the Russia–Georgia border.

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3 Olivia Allison and Joshua Coyle, 'Russian War-Related Illicit Trade in the Black Sea: International Networks and Policy Options', SOC ACE Research Paper 44 and Briefing Note 55, University of Birmingham, July 2026, https://www.socace-research.org.uk/publications/rp44-bn55-illicit-trade-black-sea. Figures as reported in Euromaidan Press, 31 July 2026, https://euromaidanpress.com/2026/07/31/occupied-ukraine-ships-poti-georgia/.

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7 Black Sea MoU on Port State Control, Annual Report 2025, Table 2, p. 12, and Table 17, p. 27, https://bsmou.org/downloads/annual-reports/BSMOU-AR-2025.pdf. Detention rates are detentions per 100 inspections; deficiencies are counted per inspection. 2023 is shown because the 2024 report gives inconsistent regional figures (4.69 and 4.71 per cent).

8 John T. Psaropoulos, 'Law of the Sea comes to life in the hunt for sanctioned Russian oil', Al Jazeera, 14 October 2026, https://www.aljazeera.com/news/2026/10/14/law-of-the-sea-comes-to-life-in-the-hunt-for-sanctioned-russian-oil; Mike Schuler, 'Denmark Intensifies Inspections of Russian Oil Tankers in Critical Shipping Lane', gCaptain, 6 February 2025, https://gcaptain.com/denmark-intensifies-inspections-of-russian-oil-tankers-in-critical-shipping-lane. The United Kingdom and France have also boarded vessels on the high seas under the right of visit in Article 110 of the UN Convention on the Law of the Sea.

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13 Regulation (EU) 2018/1806, Article 8f, as amended by Regulation (EU) 2025/2441, https://eur-lex.europa.eu/eli/reg/2025/2441/oj.

14 Call for expressions of interest, 'Supervision of Design and Build of a Railway and Related Infrastructure Connecting to the Anaklia Deep-Sea Port', project P513957, World Bank Group (IBRD), published 21 October 2026, deadline 17 November 2026, via Germany Trade & Invest, https://www.gtai.de/de/trade/georgien/ausschreibungen-projekte/consulting-bauueberwachung-bahnanschluss-des-tiefseehafens-anaklia-2036300.

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17 JAMnews, 11 December 2025, https://jam-news.net/russia-backed-customs-terminal-to-open-in-gali-abkhazia-tbilisi-responds/; OC Media, 15 December 2025, https://oc-media.org/abkhazia-moves-ahead-with-transit-hub-for-russia-bound-goods-via-georgia/.

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