



Sanctions (Restrictive Measures) Imposed on Russia and Belarus over Ukraine

Guidance for legal practitioners

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About the EU sanctions

The EU has imposed a number of further sanctions on Russia and Belarus on foot of the Russian invasion of Ukraine on 24 February 2022. Sanctions are restrictive measures imposed on individuals or entities in an effort to curtail their activities and to exert pressure and influence on them. These restrictive measures may include, but are not limited to, financial sanctions, trade sanctions, restrictions on travel or civil aviation restrictions.

The Department of Justice has published general guidance on [Sanctions](#). In light of the Russian invasion of Ukraine, the EU has published a range of restrictive measures which apply to hundreds of individuals and entities. A brief summary of the most recent of these restrictive measures is available in the section below entitled: *'What new EU sanctions have been imposed?'*

Purpose of this guidance

This guidance is provided as part of the Legal Service Regulatory Authority's role as the competent authority for all barristers in relation to anti-money laundering obligations, and as part of the LSRA's role in receiving and investigating complaints of alleged misconduct about legal practitioners.

The LSRA has published general guidance in respect of [Barristers' Anti-Money Laundering Obligations](#). In summary, "designated persons" under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended, are required to apply measures to prevent their businesses from being misused for the purposes of money laundering or terrorist financing, and include barristers who are providing specified services.

The LSRA is the competent authority for all barristers i.e. barristers who are members of the Law Library and barristers who are not members of the Law Library. The role of the LSRA as a competent authority includes effectively monitoring barristers, as designated persons, and taking measures that are reasonably necessary for securing compliance with the provisions of the Act.

Sanctions are considered to be a key tool in the fight against terrorism. They may be relevant to legal practitioners in the context of their obligations under the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended. In accordance with its supervisory functions as the competent authority for barristers, the LSRA must ensure that the obligations arising from the EU sanctions are communicated appropriately to all barristers.



The LSRA is empowered under the Legal Services Regulation Act 2015 to receive and investigate complaints about legal practitioners – solicitors and barristers. The LSRA handles three types of complaints, namely complaints relating to inadequate legal services, excessive costs, and misconduct. The LSRA has produced guidance on [What You Can Complain About](#). Section 50 of the Legal Services Regulation Act 2015 provides a full list of the acts or omissions that may be considered as misconduct. These include where an act or omission consists of the commission of an arrestable offence and where an act or omission is likely to bring the legal professions into disrepute.

A failure by a legal practitioner to comply with his or her obligations in respect of the EU sanctions may give rise to a complaint of alleged misconduct to the LSRA under these descriptions of misconduct. The Law Society of Ireland has warned solicitors, in its guidance on the [Sanctions \(Restrictive Measures\) on Russia and Belarus over Ukraine](#), that it is a criminal offence not to comply with the EU sanctions and that a failure to do so could also result in severe reputational damage.

This guidance is intended to provide general information for legal practitioners and to support and assist legal practitioners in complying with their obligations in respect of the sanctions. **However, it is the responsibility of each individual legal practitioner to comply with their obligations in respect of the sanctions. The information provided here is intended as guidance only, is not exhaustive and does not purport to provide legal advice or a legal interpretation of the sanctions.** Legal practitioners are encouraged to familiarise themselves with their legal obligations in respect of the sanctions and to satisfy themselves that they are in compliance with these obligations.

****This guidance is up-to-date as of 11 March 2024. This is a live document and is subject to change.***

What EU sanctions have been imposed?

This document sets out details of the recent EU sanctions that have been imposed in chronological order of the date they were implemented.

The Department of Finance asks that all entities familiarise themselves with the measures introduced and how they can comply with the sanctions. The relevant Statutory Instruments are, or will be shortly, available on the [Irish Statute Book](#). This guidance provides a list of the relevant legislation in respect of the EU sanctions in the section entitled: *'Where are the EU sanctions and the penalties for breaching them to be found?'* In the section entitled: *'Other resources'* this guidance also identifies a number of websites which should be monitored in case further information on the EU sanctions becomes available.



Recent EU sanctions (including amendments) are:

First Package – 23 February 2022

In response to Russia recognising the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and its decision to send troops into the region, the Council adopted a package of sanctions on 23 February 2022. These sanctions target the ability of the Russian state and government to access the EU's capital and financial markets and services, to limit the financing of escalatory and aggressive policies economic relations between the two non-government controlled regions and the EU, to ensure that those responsible clearly feel the economic consequences of their illegal and aggressive actions individuals and organisations who played a role in undermining or threatening the territorial integrity and independence of Ukraine. With these additions, the list comprises a total of 555 individuals and 52 organisations.

Second Package – 25 February 2022

Following up on the conclusions of the European Council on 24 February 2022, the Council adopted on 25 February the following package of individual and economic measures:

- Financial sector sanctions that will cut Russia's access to the most important capital markets, targeting 70% of the Russian banking market, but also key state-owned companies, including the field of defence
- Energy sector sanctions that will prohibit the sale, supply, transfer or export to Russia of specific goods and technologies in oil refining, and will introduce restrictions on the provision of related services
- Transport sector sanctions that will ban the sale of all aircraft, spare parts and equipment to Russian airlines. This will degrade the key sector of Russia's economy and the country's connectivity
- Technology sector sanctions imposing further restrictions on exports of dual-use goods and technology, as well as restrictions on exports of certain goods and technology which might contribute to Russia's technological enhancement of its defence and security sector
- Visa policy sanctions that mean diplomats and related groups, and business people will no longer have privileged access to the EU. With these additions, the list of sanctioned persons and organisations comprises a total of 654 individuals and 52 organisations.



Third Package – 2 March and 28 February 2022

The Council adopted the following restrictive measures:

- Exclude key Russian banks from the SWIFT system, the world's dominant financial messaging system. This measure will stop these banks from conducting their financial transactions worldwide in a fast and efficient manner. This decision was closely coordinated with the EU's international partners, such as the United States and the United Kingdom.
- Prohibit investing in projects co-financed by the Russian Direct Investment Fund.
- Prohibit the provision of euro-denominated banknotes to Russia.
- Prohibit state-owned media Russia Today and Sputnik from broadcasting in the EU.
- Restrictions on trade against Belarus and add 22 members of the Belarusian military personnel to the list of sanctioned people and organisations.

With these additions, the list comprises a total of 702 individuals and 53 organisations

Compliance Package – 9 March 2022

The Council adopted the following restrictive measures:

- Exclude three Belarusian banks from the SWIFT system.
- Prohibit transactions with the Central Bank of Belarus related to the management of reserves or assets, and the provision of public financing for trade with and investment in Belarus.
- Clarify the notion of “transferable securities” so as to clearly include crypto-assets, and thus ensure the proper implementation of the sectoral restrictions in place.
- Prohibit the listing and provision of services in relation to shares of Belarus state-owned organisations on EU trading venues as of 12 April 2022.
- Significantly limit the financial inflows from Belarus to the EU, by prohibiting the acceptance of deposits exceeding €100.000 from Belarusian nationals or residents, the holding of accounts of Belarusian clients by the EU central securities depositories, as well as the selling of euro-denominated securities to Belarusian clients.
- Prohibit the provision of euro denominated banknotes to Belarus.
- Further restrictive measures with regard to the export of maritime navigation goods and radio communication technology to Russia.
- Add 160 individuals to the list of sanctioned people and organisations.



With these additions, the list comprises a total of 862 individuals and 53 organisations.

Fourth Package – 15 March 2022

The Council adopted the following restrictive measures:

- A full prohibition on transactions with certain Russian State-owned enterprises, with the exception of State-owned banks, railways and the maritime shipping register.
- Prohibit EU agencies from providing financial rating services to Russian companies
- A ban on imports of iron and steel products currently under EU safeguard measures as well as new investments in the Russian energy sector, with the exception of nuclear energy and the transport of energy products.
- Prohibit the export of luxury goods.
- Add 15 individuals and 9 organisations to the list of sanctioned people and organisations, to include more oligarchs and business elites linked to the Kremlin, as well as companies active in military and defence sectors, and disinformation.

With these additions, the list comprises a total of 877 individuals and 62 organisations.

Fifth Package – 8 April 2022

The Council of the European Union adopted the following restrictive measures:

- Coal ban: An import ban on all forms of Russian coal
- Financial measures: A full transaction ban and asset freeze on four additional Russian banks. A prohibition on providing high-value crypto-asset services to Russia. A prohibition on providing trust services to wealthy Russians, making it more difficult for them to store their wealth in the EU
- Transport: A full ban on Russian and Belarusian freight road operators working in the EU. Certain exemptions cover essentials, such as mail, agricultural and food products, humanitarian aid as well as energy. An entry ban on Russian-flagged vessels to EU ports. Exemptions apply for medical, food, energy, and humanitarian purposes, amongst others
- Targeted export bans: Further targeted export bans that include, in particular, quantum computing, advanced semiconductors, sensitive machinery, transportation and chemicals
- Extending import bans: Additional import bans including cement, rubber products, wood, spirits (including vodka), liquor, high-end seafood (including caviar), and an anti-circumvention measure against potash imports from Belarus



- Excluding Russia from public contracts and European money: Full prohibition on the participation of Russian nationals and organisations in procurement contracts in the EU. Restriction on financial and non-financial support to Russian publicly owned or controlled organisations under EU, Euratom and Member State programmes
- Legal clarifications: Extension of the prohibitions on the export of banknotes and on the sale of transferrable securities to Russian nationals or organisations to all official EU currencies
- Assets freezes: Addition of a further 217 individuals and 18 organisations on the list.

Sixth Package – 3 June 2022

The Council of the European Union adopted the following additional measures:

- Oil import restrictions
- Crude and refined oil embargo: These sanctions will come into force with immediate effect, and will phase out Russian oil imports in an orderly fashion. For seaborne crude oil, spot market transactions and execution of existing contracts will be permitted for six months after entry into force, while for petroleum products, these will be permitted for eight months after entry into force. Member States who have a particular pipeline dependency on Russia can benefit from a temporary exemption and continue to receive crude oil delivered by pipeline, until the Council decides otherwise. However, Member States benefiting from this exemption will not be able to resell such crude oil and petroleum products to other Member States or non-EU countries
- Due to its specific geographical exposure, a special temporary derogation until the end of 2024 has been agreed for Bulgaria which will be able to continue to import crude oil and petroleum products via maritime transport. In addition, Croatia will be able to authorise until the end of 2023 the import of Russian vacuum gas oil which is needed for the functioning of its refinery
- Oil transport services
- After a wind down period of 6 months, EU operators will be prohibited from insuring and financing the transport, in particular through maritime routes, of oil to non-EU countries
- This will make it particularly difficult for Russia to continue exporting its crude oil and petroleum products to the rest of the world since EU operators are important providers of such services
- Financial and business services measures

- An additional three Russian banks, Russia's largest bank Sberbank, Credit Bank of Moscow, and Russian Agricultural Bank – and the Belarusian Bank for Development and Reconstruction – have been removed from SWIFT. These banks are critical for the Russian financial system and Putin's ability to further wage war. It will solidify the isolation of the Russian financial sector from the global system
- The measures on trusts have been refined and appropriate exceptions have been laid down in a revised version of the provision (e.g. for humanitarian purposes or civil society)
- The provision of certain business-relevant services – directly or indirectly – such as accounting, auditing, statutory audit, bookkeeping and tax consulting services, business and management consulting, and public relations services to the Russian government, as well as to legal persons, organisations or bodies established in Russia are now prohibited
- Broadcasting suspension
- The broadcasting activities of another three Russian State outlets – Rossiya RTR/RTR Planeta, Rossiya 24/Russia 24, and TV Centre International – have been suspended. They are among the most important pro-Kremlin disinformation outlets targeting audiences in Ukraine and the EU, and disseminating propaganda in support of Russia's aggression against Ukraine
- Several regulators in EU Member States have already taken action against those Russian state-controlled broadcasters and channels. They will now be barred from distributing their content across the EU, in whatever shape or form, be it on cable, via satellite, on the internet or via smartphone apps
- The advertising of products or services on sanctioned outlets has also been prohibited
- Export restrictions
- The list of advanced technology items banned from export to Russia has been expanded to include additional chemicals that could be used in the process of manufacturing chemical weapons. These are controlled since 2013 for other destinations such as Syria. Moreover, the package further expands the list of natural persons, legal persons or organisations associated with Russia's military-industrial complex. These natural persons, legal persons or organisations are involved in various sectors, such as electronics, communications, weapons, shipyards, engineering and scientific research. This update brings the EU into alignment with United States measures, while other partners are expected to align in the near future
- The package adds the United Kingdom and the Republic of Korea to the Annex of partner countries that have adopted substantially equivalent export restrictions

- The list of Belarusian organisations subject to restrictions has been significantly widened (from 1 to 25). This is related to authorisations for the sale, supply, transfer or export of dual-use goods and technology, as well as goods and technology that might contribute to Belarus's military and technological enhancement, or to the development of its defence and security sector.

Maintenance and Alignment Package – 21 July 2022

The Council of the European Union adopted the following additional measures:

Gold import ban:

- The import of all gold originating from Russia and exported from Russia into the EU or to any non-EU country is prohibited. An exemption applies for gold jewellery of travellers for their personal use
- Reporting requirements strengthened: Sanctioned people are obliged to declare their assets, in order to facilitate the freezing of their assets in the EU

Targeted export bans:

- Export controls on dual use and advanced technology is reinforced by extending the list of items that could contribute to Russia's military and technological improvements or the development of the country's military and security sector

Port access ban:

- Russian flagged vessels are banned from accessing locks to prevent the circumvention of sanctions

Financial sanctions:

- The ban on accepting deposits is extended to deposits from legal persons, organisations or bodies established in non-EU countries and majority-owned by Russian nationals or natural persons residing in Russia. Additionally, the acceptance of deposits for non-prohibited cross-border trade will be subject to a prior authorisation by national competent authorities

Food and energy security:

- Transactions for agricultural products and the transport of oil to non-EU countries with certain state-owned organisations are exempted
- Medical and pharmaceutical exemptions:
- Exemptions are added for certain export prohibitions for medical and pharmaceutical purposes

Clarifications:

- introduction of a number of clarifications to existing measures, for instance in the field of public procurement, aviation and justice



Assets freezes:

- Adding of a further 54 individuals and 10 organisations on the list

Eighth Package – 5 October 2022

The Council of the European Union adopted the following additional measures

Additional listings:

- Additional individuals and organisations have been sanctioned. This targets those involved in Russia's occupation, illegal annexation, and sham “referenda” in the occupied territories/oblasts of the Donetsk, Luhansk, Kherson, and Zaporizhzhia regions. It also includes individuals and organisations working in the defence sector, such as high-ranking and military officials, as well as companies supporting the Russian armed forces. The EU also continues to target those who spread disinformation about the war.
- EU restrictive measure target key decision makers, oligarchs, senior military officials and propagandists, responsible for undermining Ukraine's territorial integrity.
- Extension of restrictions to the oblasts of Kherson and Zaporizhzhia:
- The geographical scope of the restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine and the ordering of Russian armed forces into those areas has been extended to cover all the non-government controlled areas of Ukraine in the oblasts of Donetsk, Luhansk, Zaporizhzhia and Kherson.

New export restrictions:

- Additional export restrictions have been introduced that aim to reduce Russia's access to military, industrial and technological items, as well as its ability to develop its defence and security sector.
- This includes a ban on the export of coal including coking coal (which is used in Russian industrial plants), specific electronic components (found in Russian weapons), technical items used in the aviation sector, as well as certain chemicals.
- A prohibition on exporting small arms and other goods under the anti-torture Regulation has been added.

New import restrictions:

- Almost €7 billion worth of additional import restrictions have been agreed.
- This includes, for example, a ban on the import of Russian finished and semi-finished steel products (subject to a transition period for some semi-finished), machinery and

appliances, plastics, vehicles, textiles, footwear, leather, ceramics, certain chemical products, and non-gold jewellery.

Implementing the G7 oil price cap:

- This package marks the beginning of the implementation within the EU of the G7 agreement on Russian oil exports. While the EU's ban on importing Russian seaborne crude oil remains fully in place, the price cap, once implemented, would allow European operators to carry out and support the transport of Russian oil to non-EU countries, provided its price remains under a pre-set “cap”. This will help to further reduce Russia's revenues, while keeping global energy markets stable through continued supplies. It will therefore also help address inflation and keep energy costs stable at a time when high costs – particularly elevated fuel prices – are a great concern to all Europeans.
- This measure, after being closely coordinated with G7 partners, took effect following a further decision by the Council: It took effect from 5 December 2022 for crude and 5 February 2023 for refined petroleum products.

Restrictions on State-owned enterprises:

- This package bans EU nationals from holding posts in the governing bodies of certain state-owned enterprises.
- It also bans all transactions with the Russian Maritime Register, adding it to the list of state-owned enterprises that are subject to a transaction ban.
- Financial, IT consultancy and other business services:
- The existing prohibitions on crypto assets have been tightened by banning all crypto-asset wallets, accounts, or custody services, irrespective of the amount of the wallet (previously up to €10,000 was allowed).
- The package widens the scope of services that can no longer be provided to the government of Russia or legal persons established in Russia: these now include IT consultancy, legal advisory, architecture and engineering services. These are significant as they will potentially weaken Russia's industrial capacity because it is highly dependent on importing these services.

Deterring sanctions circumvention:

- The EU has introduced a new listing criterion, which will allow it to sanction individuals who facilitate the infringements of the prohibition against circumvention of sanctions.

Ninth Package – 16 December 2022

The Council of the European Union adopted the following additional measures

Additional listings:



- The EU has added almost 200 additional individuals and organisations to our list of people subject to a freezing of their assets. This includes the Russian armed forces, as well as individual officers and defence industry companies, members of the State Duma and Federation Council, ministers, Russian proxy authorities in occupied areas of Ukraine and political parties, among others. This list covers key figures involved in Russia's brutal and deliberate missile strikes against civilians, in the kidnapping and abduction to Russia of Ukrainian children, and in the theft of Ukrainian agricultural products.

Additional EU export bans:

- New export restrictions have been introduced on sensitive dual-use and advanced technologies that contribute to Russia's military capabilities and technological enhancement. This includes drone engines, camouflage gear, additional chemical/biological equipment, riot control agents and additional electronic components found in Russian military systems on the battlefield.
- Moreover, the most severe export restrictions have been extended to 168 additional Russian organisations closely linked to the Russian military-industrial complex in an effort to cut off their access to sensitive dual-use and advanced technology items. This brings the total number of organisations sanctioned to 410. This decision has been taken in close collaboration with our partners and includes military end-users working in various sectors such as aeronautics.
- New export bans will extend to additional industrial goods and technology, such as toy/hobby drones, complex generator devices, laptop computers and computing components, printed circuits, radio navigational systems, radio remote control apparatus, aircraft engines and parts of engines, cameras and lenses.
- An even wider range of business services can no longer be provided to Russia with the introduction of bans on market research and public opinion polling services, technical testing and analysis services, and advertising services.

Additional transactions bans for Russian banks:

- Three additional Russian banks have been sanctioned, including a full transaction ban on the Russian Regional Development Bank to further paralyse Putin's cash machines.
- Additional bans on Russian media outlets:
- Four additional Russian channels have been sanctioned in the EU.

Cutting Russia's access to drones:

- The direct exports of drone engines to Russia is now restricted, as is the export to any non-EU countries, such as Iran, where there is a suspicion that they will be used



in Russia. There are also additional economic measures against the Russian energy and mining sectors.

Tenth Package – 25 February 2023

The Council of the European Union adopted the following additional measures

Additional listings:

- The EU has added about 120 individuals and entities to our sanction list, including Russian decision-makers, senior government officials and military leaders complicit in the war against Ukraine, as well as proxy authorities installed by Russia in the occupied territories in Ukraine, among others. The list also includes key figures involved in the kidnapping of Ukrainian children to Russia, as well as organisations and individuals, who are polluting the public space with disinformation, adding to the military warfare through information warfare. Measures are also taken against individuals in Iran who are involved in the elaboration of drones and components supporting Russia's military. In addition, members and supporters of Russia's Wagner mercenary group and its activities in other countries, such as Mali or Central African Republic, are also targeted.

Additional EU export bans:

- New export restrictions have been introduced on sensitive dual-use and advanced technologies that contribute to Russia's military capabilities and technological enhancement, based on information received from Ukraine, our Member States and our partners. This includes additional electronic components used in Russian weapons systems (drones, missiles, helicopters, other vehicles), as well as bans on specific rare earths and thermal cameras with military applications. Moreover, we are also listing 96 additional entities associated to Russia's military-industrial complex, bringing the total of military end-users that are listed to 506. This also includes, for the first time, seven Iranian entities that have been using EU components and providing Russia with military "Shahed" drones to attack civilian infrastructure in Ukraine. Importantly, we are working in close coordination with partners, and are adding Australia, Canada and New Zealand and Norway to the list of our partner countries.

Additional export bans are now also imposed on goods that can be easily redirected to be used to support the Russian war effort including

- vehicles: heavy trucks not yet banned (and their spare parts), semi-trailers, and special vehicles such as snowmobiles



- goods easily directed to the Russian military: including electric generators, binoculars, radars, compass, etc
- construction goods such as bridges, structures for buildings tower-like, fork-lifts trucks, cranes, etc.
- goods that are critical for the functioning and enhancement of Russian industrial capacity (electronics, machine parts, pumps, machinery for working metals, etc.)
- complete industrial plants: this category has been added to avoid loopholes
- goods used in the aviation industry (turbojets)

These new bans and restrictions cover EU exports worth EUR 11.4 billion (2021 data). They come on top of the €32.5 billion worth of exports already sanctioned in the previous packages. With today's package, the EU has sanctioned in total nearly close to half (49%) of its 2021 exports to Russia.

Additional imports bans into the EU: Today's package imposes import bans on the following Russian high-revenue goods

- bitumen and related materials like asphalt
- synthetic rubber and carbon blacks

These new import bans cover EU imports worth almost EUR 1.3 billion and they come on top of €90 billion already sanctioned, representing altogether 58% of the EU's 2021 imports.

Financial sector:

Three Russian banks have been added to the list of entities subject to the asset freeze and the prohibition to make funds and economic resources available.

Other measures include the following

- a ban on Russian nationals from serving on governing bodies of Member States' critical infrastructure companies
- prohibition on Russian nationals and entities to book gas storage capacity in the Union (LNG excluded)
- measures to facilitate the divestment from Russia by EU operators

A third country shipping company, suspected of helping Russia circumvent sanctions on oil exports, has also been listed.

Enforcement and anti-circumvention measures:

Today's package imposes new reporting obligations on Russian Central Bank assets. This is especially important regarding the possible use of public Russian assets to fund the reconstruction of Ukraine after Russia is defeated.



Other measures include the following

- reporting obligations on frozen assets (including for dealings before listings) and assets which should be frozen
- private flights between the EU and Russia, directly or via third countries, should be notified in advance
- prohibition to transit dual use goods and firearms via the territory of Russia to third countries

In addition to today's package, the EU sanctions envoy David O'Sullivan is reaching out to third countries, to ensure strict implementation of sanctions and prevent circumvention. On 23 February, the first Sanctions Coordinators Forum took place in Brussels, gathering our international partners and Member States, to strengthen enforcement efforts.

Additional bans on Russian disinformation outlets:

Two additional Russian media outlets have been added to the media ban.

Technical amendments

- amendment to allow the provision of pilot services necessary for maritime safety
- definition of the term “import” to avoid goods being “stranded” in long customs procedures

Eleventh Package – 23 June 2023

The Council of the European Union adopted the following additional measures:

Additional listings:

- The EU has added about 120 individuals and entities to our sanction list, including Russian decision-makers, senior government officials and military leaders complicit in the war against Ukraine, as well as proxy authorities installed by Russia in the occupied territories in Ukraine, among others. The list also includes key figures involved in the kidnapping of Ukrainian children to Russia, as well as organisations and individuals, who are polluting the public space with disinformation, adding to the military warfare through information warfare. Measures are also taken against individuals in Iran who are involved in the elaboration of drones and components supporting Russia's military. In addition, members and supporters of Russia's Wagner mercenary group and its activities in other countries, such as Mali or Central African Republic, are also targeted.



Additional EU export bans:

- New export restrictions have been introduced on sensitive dual-use and advanced technologies that contribute to Russia's military capabilities and technological enhancement, based on information received from Ukraine, our Member States and our partners. This includes additional electronic components used in Russian weapons systems (drones, missiles, helicopters, other vehicles), as well as bans on specific rare earths and thermal cameras with military applications. Moreover, we are also listing 96 additional entities associated to Russia's military-industrial complex, bringing the total of military end-users that are listed to 506. This also includes, for the first time, seven Iranian entities that have been using EU components and providing Russia with military "Shahed" drones to attack civilian infrastructure in Ukraine. Importantly, we are working in close coordination with partners, and are adding Australia, Canada and New Zealand and Norway to the list of our partner countries.

Additional export bans are now also imposed on goods that can be easily redirected to be used to support the Russian war effort including

- vehicles: heavy trucks not yet banned (and their spare parts), semi-trailers, and special vehicles such as snowmobiles
- goods easily directed to the Russian military: including electric generators, binoculars, radars, compass, etc
- construction goods such as bridges, structures for buildings tower-like, fork-lifts trucks, cranes, etc.
- goods that are critical for the functioning and enhancement of Russian industrial capacity (electronics, machine parts, pumps, machinery for working metals, etc.)
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Financial sector:

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Other measures include the following

- a ban on Russian nationals from serving on governing bodies of Member States' critical infrastructure companies
- prohibition on Russian nationals and entities to book gas storage capacity in the Union (LNG excluded)
- measures to facilitate the divestment from Russia by EU operators
- A third country shipping company, suspected of helping Russia circumvent sanctions on oil exports, has also been listed.

Enforcement and anti-circumvention measures:

Today's package imposes new reporting obligations on Russian Central Bank assets. This is especially important regarding the possible use of public Russian assets to fund the reconstruction of Ukraine after Russia is defeated.

Other measures include the following

- reporting obligations on frozen assets (including for dealings before listings) and assets which should be frozen
- private flights between the EU and Russia, directly or via third countries, should be notified in advance
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Two additional Russian media outlets have been added to the media ban.

Technical amendments

- amendment to allow the provision of pilot services necessary for maritime safety
- definition of the term "import" to avoid goods being "stranded" in long customs procedures



Extension of the scope of sanction on Belarus to fight circumvention – 3 August 2023

New measures amend Regulation (EC) 765/2006 concerning restrictive measures in view of the situation in Belarus. These amendments create a closer alignment of EU sanctions targeting Russia and Belarus and will help to ensure that Russian sanctions cannot be circumvented through Belarus.

The measures expand the ban on exports to Belarus to a number of highly sensitive goods and technologies which contribute to Belarus's military and technological enhancement. The Council also imposes an additional export ban on firearms and ammunition, and on goods and technology suited for use in aviation and the space industry. The changes also align the Belarus sanctions with the Russia sanctions regime.

These restrictive measures are fast-tracked in view of the urgency linked to the fight against circumvention regarding certain highly sensitive goods and technologies. They are without prejudice to the remainder of the proposals presented by the High Representative of the Union for Foreign Affairs and Security Policy and Commission to amend Decision 2012/642/CFSP and Regulation (EC) No 765/2006 on 26 January 2023, which remain on the table.

Twelfth Package – 18 December 2023

The Council of the European Union adopted the following additional measures:

Additional listings:

- Over 140 additional individuals and entities subject to asset freezes. This covers actors in the Russian military and defence, including military industry companies and Private Military Companies. This also includes actors from the IT sector, as well as other important economic actors. The measures also target those who have orchestrated the recent illegal so-called “elections” in the territories of Ukraine that Russia has temporarily occupied, and those responsible for the forced “re-education” of Ukrainian children, as well as actors spreading disinformation/propaganda in support of Russia's war of aggression against Ukraine

Trade measures:

- Import ban on Russian diamonds: import restrictions on non-industrial diamonds, mined, processed, or produced, in Russia. These proposed sanctions are part of an internationally coordinated G7 diamond ban, aiming to deprive Russia of this important revenue stream estimated at €4 billion per year. All G7 members will implement a direct ban on diamonds exported from Russia at the latest by 1 January 2024. As of 1 March 2024, a ban on Russian diamonds polished in a third country will

take effect and, as of 1 September 2024, the ban will be expanded to include lab-grown diamonds, jewellery, and watches containing diamonds. To further the effectiveness of these measures, a robust traceability-based verification and certification mechanism for rough diamonds will be established within the G7

- Import ban on raw materials for steel production, processed aluminium products and other metal goods: new measures restricting imports from Russia of certain metal goods

Export restrictions:

- Additional export restrictions on dual-use and advanced technological and industrial goods worth €2.3 billion per year
- New export controls on dual use/advanced tech, aiming to further weaken Russia's military capabilities, including chemicals, thermostats, DC motors and servomotors for unmanned aerial vehicles (UAV), machine tools and machinery parts
- New export bans on EU industrial goods, to further hamper Russia's capacities in its industrial sector, including machinery and parts, construction-related goods, processed steel, copper and aluminium goods, lasers, and batteries
- Addition of 29 Russian and third country entities to the list of entities associated to Russia's military-industrial complex (including entities registered in Uzbekistan and Singapore)
- Prohibition to provide enterprise and design-related software to the Russian government or Russian companies. The aim is to further hamper Russia's capacities in its industrial sector. Restrictions in the area of services are an area where we have worked closely with our international partners, including the US and the UK
- Stricter asset freeze obligations

New listing criterion:

- The Council has agreed a new listing criterion to include persons who benefit from the forced transfer of ownership or control over Russian subsidiaries of EU companies. This will ensure that no one profits from the losses that EU companies face when their subsidiaries are forcibly acquired by Russian owners/management
- Possibility to keep deceased persons on the asset freeze list, in order to prevent the freezing measure from potentially being undermined
- Tighter obligation for Member States to proactively trace assets of listed persons, in order to prevent and detect instances of breach or circumvention of sanctions



Energy measures:

- Oil price cap: To make it more difficult for Russia to sustain the war, we have tightened the international G7+ oil price cap, by introducing new measures to more closely monitor the sale of tankers to third countries, as well as require more detailed attestation requirements. This will help to tackle the 'shadow fleet' used by Russia to circumvent the price cap. In this respect, the EU is in close dialogue with our G7 partners to ensure alignment of our measures and future guidance
- New import ban on liquified petroleum gas (LPG), impacting annual imports worth over €1 billion, with grandfathering of existing contracts for a period of maximum 12 months
- Stronger anti-circumvention measures
- Broadening of the scope of the transit prohibition through Russia by adding certain economically critical goods when these are intended for export to third countries
- Obligation for operators to contractually prohibit the re-export of certain categories of sensitive goods to Russia, including goods related to aviation, jet fuel, firearms and goods on the common high priority list
- Introduction of a new measure that will require the notification of certain transfers of funds out of the EU from EU entities directly or indirectly owned by more than 40% by Russians or entities established in Russia

Additional measures:

- Introduction of a new derogation to allow for cases in which Member States decide to deprive in the public interest a listed person of funds or economic resources
- Introduction of a derogation to allow compensation for damages to be paid by a newly listed insurance company
- Introduction of a derogation to allow the sale of EU companies owned by certain listed individuals or entities

Other:

- Inclusion of a technical amendment allowing for the provision of pilot services necessary for maritime safety

Thirteenth Package – 23 February 2024

The Council of the European Union adopted the following additional measures:

Additional listings:

This is an unprecedented package of 194 individual designations, including 106 individuals and 88 entities. With it, the EU exceeds the threshold of 2000 listings. In particular



- Targeting Russia's military and defence sector: the new listings include more than 140 companies and individuals from the Russian military-industrial complex, which among other things manufacture missiles, drones, anti-aircraft missile system, military vehicles, high-tech components for weapons, and other military equipment
- Sending a strong signal against Russia's war effort partners: the new listings target 10 Russian companies and individuals involved in the shipping of Democratic People's Republic of Korea (DPRK) armaments to Russia. They also target the Defence Minister of the DPRK, as well as several Belarusian companies and individuals providing support to the Russian armed forces
- Fighting circumvention: the new listings include a Russian logistics company and its director involved in parallel imports of prohibited goods to Russia, and a third Russian actor involved in another procurement scheme
- Strengthening EU action against Russia's temporary occupation and illegal annexation of areas of Ukraine: the new listings include six judges and 10 officials in the occupied territories of Ukraine
- Sanctioning violations of children rights: The new listings also include 15 individuals and 2 entities involved in the forced transfer and in the deportation and the military indoctrination of Ukrainian children, including in Belarus

Trade measures:

This package further deepens our actions to stop Russia from acquiring Western sensitive technologies for Russian military. Unmanned aerial vehicles, or drones, have been central to Russia's war against Ukraine. This package thus specifically lists companies procuring Russia with key drone components and introduces some sectoral sanctions to close loopholes and make drone warfare more complicated.

Based on hard evidence from various sources, supported by trade and customs data, the package adds 27 Russian and third country companies to the list of entities associated to Russia's military-industrial complex (Annex IV of Regulation 833/2014). The EU will impose export restrictions towards these companies regarding dual-use goods and technology, as well as goods and technology which might contribute to the technological enhancement of Russia's defence and security sector. The package adds:

- 17 Russian companies which are involved in the development, production and supply of electronic components, particularly used in connection with drone production
- Four companies registered in China and one each registered in Kazakhstan, India, Serbia, Thailand, Sri Lanka, and Türkiye, also trading in the area of electronic components, including of EU-origin



In addition, the package expands the list of advanced technology items that may contribute to Russia's military and technological enhancement or to the development of its defence and security sector. It adds components used for the development and production of drones, such as electric transformers, static converters and inductors found inter alia in drones, as well as aluminium capacitors, which have military applications, such as in missiles and drones and in communication systems for aircrafts and vessels. This will further weaken Russia's military capabilities.

Measures to foster international cooperation:

The new package adds the United Kingdom to the list of partner countries for the iron and steel imports. These partner countries apply a set of restrictive measures on imports of iron and steel and a set of import control measures that are substantially equivalent to those in the EU Regulation (EU) No 833/2014.

What application might the EU sanctions have to the legal services sector?

The restrictive measures will not affect the practice of the vast majority of legal practitioners. However, they may have application to a limited number of legal practitioners who provide legal advice with an international dimension, to include in respect of financial transactions and in the creation, operation or management of trusts.

Also, there may be a limited number of legal practitioners providing legal services to persons or entities who have been targeted under the new EU sanctions. The lists of persons and entities under EU restrictive measures over the territorial integrity of Ukraine are set out in the Annex to Council Decision 2014/145 CFSP as amended which is available [here](#). It is incumbent on every barrister to determine whether the restrictive measures have any application to the services provided by him or her.

The Law Society of Ireland, in its guidance on the [Sanctions \(Restrictive Measures\) on Russia and Belarus over Ukraine](#), recommends that solicitors should document the outcome of their thought processes about the potential exposure of their firms to new sanctions. The LSRA recommends barristers may wish to conduct a similar documenting exercise where appropriate.

What are the penalties for breaching the EU sanctions?

The penalties in Irish law for a breach of the EU sanctions are contained in Irish Statutory Instruments. To date, the relevant Statutory Instruments provide that a person who



breaches the EU sanctions shall be liable, on summary conviction, to a class A fine or to imprisonment for a term not exceeding 12 months or both, or, on conviction on indictment, to a fine not exceeding €500,000 or to imprisonment for a term not exceeding 3 years or both.

This guidance provides a list of the relevant legislation in respect of the penalties for breaching the EU sanctions in the section below entitled: *'Where are the EU sanctions and penalties for breaching them to be found?'*

Where are the EU sanctions and penalties for breaching them to be found?

The Central Bank of Ireland's [Financial Sanctions Updates 2022](#) provides a detailed list of the recent legislation in respect of EU sanctions.

Furthermore, The Department of Foreign Affairs has published [Information on sanctions in respect of the situation in Ukraine](#), summarising the EU sanctions measures, and providing links to the relevant legislation.

What is the EU sanctions whistleblower tool?

The European Union sanctions whistleblower tool was rolled out on 4 March 2022, and is accessible via the Commission's website at <https://eusanctions.integrityline.com/>. It facilitates the anonymous reporting of possible violations of EU sanctions. It can be used to report past, ongoing or planned sanctions violations, as well as attempts to circumvent EU sanctions.

Details about the tool are available at https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en#whistleblower.

Other resources

Barristers are advised to monitor the websites referenced below closely in the event that further information is available or further restrictive measures are adopted.

Further information on the EU sanctions can be viewed at:

- the [Irish Statute Book](#);
- [the Central Bank of Ireland](#);



- the [Department of Foreign Affairs](#) website – which provides domestic guidance on the implementation of sanctions at the bottom of this page;
- the [EU Council](#) website – which outlines the measures agreed at an EU level.

A timeline of the restrictive measures is available [here](#). The lists of persons and entities under EU restrictive measures over the territorial integrity of Ukraine are available [here](#).

The Law Society of Ireland has published guidance for solicitors on the [Sanctions \(Restrictive Measures\) on Russia and Belarus over Ukraine](#).

The European Union sanctions whistle-blower tool is accessible via the Commission's website at <https://eusanctions.integrityline.com/>. More details about the tool are available at https://ec.europa.eu/info/business-economy-euro/banking-and-finance/international-relations/restrictive-measures-sanctions_en#whistleblower.

In order to facilitate compliance, the Directorate-General for Financial Stability, Financial Services and Capital Markets Union (DG FISMA) - which is responsible for the Commission's policies on banking and finance - has confirmed that it will provide *guidance on the sanctions* as soon as possible. In the interim, they recommend consulting the [Commission Guidance Note on the implementation of certain provisions of Regulation \(EU\) No 833/2014](#), in case queries may be answered there.

The Department of Foreign Affairs has published [Information on sanctions in respect of the situation in Ukraine](#), summarising the EU sanctions measures, and providing links to the relevant legislation.

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