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Trádála agus Fostaíochta
Department of Enterprise,
Trade and Employment

Guidance Note:

EU Trade Sanctions in response to Russia's aggression against Ukraine

17 January 2024



Introduction

The Government is monitoring Russia's illegal and unprovoked military aggression against Ukraine and considering the humanitarian and economic implications of the conflict on an ongoing basis.

The Department of Enterprise, Trade and Employment is responsible for the implementation of trade sanctions in accordance with Ireland's international commitments and obligations as a member of the EU. This Guidance Note summarises the key trade provisions of the EU sanctions which were adopted between 23rd February 2022 and 18th December 2023.¹

This Note is provided for information purposes only and does not constitute a legal interpretation of the EU Regulations. Traders should consult the [EU Regulations](#) directly, and when necessary, obtain professional advice.

¹ An amendment to the Annex of Council Decision 2014/145/CFSP was further made under Council Decision (CFSP) 2024/194 of 21 December 2023.



This Note will be regularly reviewed, and while every effort has been made to ensure that the following information is accurate, the situation is dynamic and the sanctions, including the lists of prohibited goods, are liable to change.

Ukraine

The following activities are **prohibited** in respect of the Ukrainian territories of **Donetsk, Kherson, Luhansk** and **Zaporizhzhia**:

- **Import** any goods originating in the territories.
- **Sell, supply, transfer, or export** *specified* goods and technology suited for use in the **telecommunications, transport, energy** and **oil production** sectors to the territories.
- Provide **technical assistance** or **brokering services** related to the *specified* goods and technology, or related to the **provision, manufacture, maintenance** and **use** of such items.

Provide **technical assistance, brokering, construction** or **engineering services** directly relating to **infrastructure** in these sectors.



Russia – Export

It is **prohibited** to **sell, supply, transfer** or **export** the following categories of goods to Russia, or for use in Russia:

- **Dual-use²** goods and technology,
- *Specified³* goods and technology which might contribute to Russia's **military** and **technological enhancement⁴**,
- *Specified* goods, **generators, toy drones, laptops, hard drives, IT components, night-vision, radio navigation equipment, cameras and lenses, chemicals, commodities** and **machinery** that might contribute to the enhancement of Russia's **industrial capabilities**,
- Goods and technology intended for use in Russia's **energy sector**,
- *Specified* goods and technology, suited for use in **oil exploration, production** or **refining**; or for use in **liquefaction of natural gas**,

² Items which have civilian and military applications – listed in Annex I of [Regulation \(EU\) 2021/821](#).

³ In this Note '*specified*' means that items are listed in an Annex to the [Regulation \(EU\) 833/2014](#).

⁴ Items span the categories Electronics; Electronic Components; Computers; Telecommunications and Information Security; Sensors and Lasers; Navigation and Avionics; Marine; Aerospace and Propulsion; Drone Engines; Chemical and Biological Equipment; Riot Control Agents; and Miscellaneous.



Russia – Export (continued)

- *Specified* goods and technology suited for use in **aviation** or **space industry**, including **jet fuel** and **fuel additives**,
- *Specified* **aviation** navigation and radio goods and technology, including for placing on a Russian-flagged vessel,
- *Specified* **luxury goods**,
- **Firearms**, their parts and essential components and ammunition,
- **Electronic components**, semiconductor materials, manufacturing and testing equipment for electronic integrated circuits and printed circuit boards, precursors to energetic materials and precursors to chemical weapons, optical components, navigational instruments, metals used in the defence sector and marine equipment,
- **Intellectual property rights** used in connection with restricted goods to prevent the sanctioned goods from simply being manufactured outside of the EU.

There are corresponding prohibitions on the provision of **technical assistance**, **brokering services** or **other services**, including **financial services**, related to these categories of goods. The **transit** of all **battlefield goods**⁵ via the territory of Russia to third countries is also prohibited.

⁵ Battlefield goods include dual use goods and technology, goods and technology listed in Annex VII of Council Regulation No. 833/2014 (Article 2a), firearms, their parts and components and ammunition, goods and technology suited for use in aviation or the space industry, goods and technology which could contribute in particular to the enhancement of Russian industrial capacities as listed in Annex XXXVII (Article 3k(1a))



Russia – Provision of Services

It is **prohibited** to **provide** the following services to the Government of Russia, or legal entities or bodies established in Russia:

- Accounting, auditing, bookkeeping or tax consulting services, business and management consulting, or public relations services,
- Architectural and engineering services, legal advisory services, and IT consulting services,
- Advertising, market research and public opinion polling services,
- Product testing and technical inspection services,
- Provision of software for the management of enterprises and software for industrial design and manufacture.



Russia – Import

- It is prohibited to **import, purchase** or **transport**, including through ship-to-ship transfer, *specified* **crude oil** or **petroleum** products, originating in Russia, or exported from Russia.
- It is prohibited to **import, purchase** or **transfer** of *specified* products and commodities, including **wood, wood pulp and paper, certain stones and precious metals, certain machinery, cement, chemicals, cigarettes, plastics and finished chemical products such as cosmetics, bitumen** and related materials such as **asphalt, synthetic rubber** and **carbon blacks**, and **seafood**, that generate significant revenues for Russia.
- It is prohibited to **import, purchase** or **transfer, iron** and **steel products**, originating in Russia, or exported from Russia.
- It is prohibited to **import, purchase** or **transfer, coal** and **other products**, originating in Russia, or exported from Russia.
- The import of *specified* **fertilizers**, including **potash**, is subject to a volume quota.
- It is prohibited to provide **technical assistance, brokering services** or **other services**, including **financial services**, related to the prohibited activities.
- It is prohibited to **import, purchase** or **transfer gold**, including jewellery, if it originates in Russia.
- It is prohibited to import **non-industrial diamonds**, mined, processed, or produced, in Russia.



Russia – Import (continued)

- It is prohibited to import **liquefied propane** (LPG).⁶
- It is prohibited to import goods which generate significant revenues for Russia such as **pig iron and spiegeleisen, copper wires, aluminium wires, foil, tubes and pipes.**

Russia – Aircraft

- It is prohibited to **sell, supply, transfer or export aircraft, spacecraft or parts thereof**, to Russia or for use in Russia.
- It is prohibited to provide **technical assistance, brokering services or other services**, including **insurance and reinsurance**, in relation to **aircraft**.
- It is prohibited to provide **overhaul, repair, inspection, replacement, modification or defect rectification** services for an **aircraft or component**.

These prohibitions apply to both manned and unmanned aircraft.

⁶ This ban shall not apply to the execution until 20 December 2024 of contracts concluded before 19 December 2023, or of ancillary contracts necessary for the execution of such contracts.



Russia – Transport

- It is prohibited for Russian **road transport operators** to transport goods within the EU.
- It is prohibited for trucks with Russian trailers and semi-trailers to transport goods to the EU.
- It is prohibited for any **vessel** registered under the **flag of Russia**, or certified by the Russian Maritime Register of Shipping, to access EU ports or locks.
- Access to EU ports is prohibited for vessels that engage in ship-to-ship transfers suspected to be in breach of the Russian oil import ban or G7 Coalition price cap.
- It is prohibited for a vessel to access an EU port if the vessel does not notify the competent authority at least 48 hours in advance about a ship-to-ship transfer occurring within the Exclusive Economic Zone of a Member State or within 12 nautical miles from the baseline of that Member State's coast.
- Access to EU ports is prohibited for vessels which manipulate or turn off their navigation tracking system when transporting Russian oil subject to the oil import ban or G7 price cap.

Exemptions may be authorised by the Department of Enterprise, Trade and Employment from the shipping and road transport bans for imports of medical; agricultural; food; fertilisers; and energy products, and for specified metals and for humanitarian purposes.



Belarus

It is prohibited to **import specified:**

- **'Potash'** products,
- **Mineral** products (including **Petroleum**),
- **Wood** products,
- **Cement** products,
- **Rubber** products,
- **Iron** and **Steel** products

It is prohibited to **sell, supply, transfer or export specified:**

- **Dual-use** goods,
- Goods which might contribute to Belarus' **military** and **technological enhancement**,
- **Firearms**, their parts and essential components
- Technology suited for use in **aviation** or the **space industry**
- Specified goods for the production of **Tobacco** products,
- **Machinery**,



- Goods for **internal repression**,
- Goods for **electronic interception** (surveillance).

It is prohibited for Belarusian **road transport operators** to transport goods within the EU.



Anti-Circumvention

It is prohibited to participate, knowingly and intentionally, in activities with the object or effect to circumvent prohibitions in the sanctions regulation.

In order to further minimise the risk of sanctions circumvention, the EU has introduced an **anti-circumvention tool**. This will allow the EU to restrict the **sale, supply, transfer or export** of *specified* sanctioned goods and technology to certain third countries whose jurisdictions are considered to be at continued and particularly high risk of circumvention. This tool will be an **exceptional and last resort measure** when other individual measures and outreach by the EU to concerned third countries have been insufficient to prevent circumvention.

In addition to Russian and Iranian entities, the sanctions now include listings of entities registered in **Hong Kong, China, Uzbekistan**, the **United Arab Emirates, Syria** and **Armenia**.

EU exporters are required to contractually prohibit **re-exportation to Russia** and **re-exportation for use in Russia of particularly sensitive goods and technology**, when selling, supplying, transferring or exporting to a third country, with the exception of partner countries.⁷

⁷ There is a grace period for contracts that were in force on 19 December 2023 until 20 December 2024 or until their expiry date, whichever is earlier.



Russian nationals are banned from owning, controlling or holding any posts on the **governing bodies of the legal persons, entities or bodies** providing crypto-asset wallet, account or custody services to Russian persons and residents.

The EU is imposing **notification requirements** for the transfer of funds outside the EU by any entity established in the EU that is owned or controlled by an entity established in Russia, or by a Russian national or natural person residing in Russia.

Exemptions

- The EU Regulations sets out specific grounds on which the exporters can avail of, or apply for, a partial or temporary derogation from the prohibitions.
- These grounds for eligibility include humanitarian, medical applications, maritime safety, software updates, to facilitate an expeditious exit from the Russian market, and for the execution of contracts entered into prior to the sanctions coming into effect.
- The requirements to avail of a derogation are precise and vary depending on the derogation being sought. Traders should closely study the details in the relevant EU Regulation.



Further Information

National

- The Department updates its website with the [latest EU trade sanctions](#) in response to situation in Ukraine, which includes links to the EU Regulations.
- Specific enquiries or requests for derogation should be submitted to exportcontrol@enterprise.gov.ie.
- [Department of Foreign Affairs – Information on sanctions in respect of the situation in Ukraine](#)
- [Department of Transport – EU sanctions in response to the situation in Ukraine](#)
- [Central Bank of Ireland – Russia/Ukraine Regulations](#)
- [Financial Sanctions - FAQ | Central Bank of Ireland](#)
- [Office of the Revenue Commissioners – Manual on EU Sanctions in response to situation in Ukraine](#)

EU

- The European Commission maintains an interactive [global map of all EU Sanctions](#)
- [Overview of EU Sanctions](#)
- [Frequently asked questions: EU Sanctions](#)
- [Sanctions adopted following Russia's military aggression against Ukraine](#)
- [EU measures following the Russian invasion of Ukraine - Information for customs authorities and stakeholders](#)



- [Frequently asked questions on export-related restrictions pursuant to Articles 2, 2a and 2b of Council Regulation No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine](#)
- [EU Sanctions Whistleblower Tool](#)