



An Roinn Fiontar,
Trádála agus Fostaíochta
Department of Enterprise,
Trade and Employment

Guidance Note:

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

9 April 2022



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, through its Trade Licensing and Control Unit, 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 Notice summarises the key trade provisions of the EU sanctions which were adopted between 23rd February and 8th April 2022.

It 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.

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



Ukraine

The following activities are **prohibited** in respect of territories of **Donetsk and Luhansk**:

- **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-use**¹ goods and technology,
- *Specified*² goods and technology that might contribute to Russia's **military** and **technological enhancement**³,
- *Specified* **low-tech** goods, **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**,

¹ Items which have civilian and military applications – listed in Annex I of [Regulation \(EU\) 2021/821](#).

² In this Note '*specified*' means that items are listed in an Annex to the [EU Regulations](#).

³ Items span the categories, Electronics; Computers; Telecommunications and Information Security; Sensors and Lasers; Navigation and Avionics; Marine; Aerospace and Propulsion; and Miscellaneous.



- *Specified* goods and technology suited for use in **aviation** or **space industry**, including **jet fuel** and **fuel additives**,
- *Specified* **maritime** navigation and radio goods and technology, including for placing on a Russian-flagged vessel,
- *Specified* **luxury goods**.

There are corresponding prohibitions on the provision of **technical assistance**, **brokering services** or **other services**, including **financial services**, related to these categories of goods.

Russia – Import

- It is prohibited to **import, purchase** or **transport** *specified* **iron** and **steel** products, originating in Russia, or exported from Russia.
- It is prohibited to **import, purchase** or **transfer** *specified* products and commodities, including **wood, cement, chemicals** and **seafood**, that generate significant revenues for Russia.
- It is prohibited to **import, purchase** or **transfer, coal** and **solid fossil fuels**, 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.



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**.

Russia – Transport

- It is prohibited for Russian **road transport operators** to transport goods within the EU,
- It is prohibited for any **vessel** registered under the **flag of Russia** to access EU ports.

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**,
- 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.



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, 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 inquiries 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](#)
- [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](#)
- [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](#)