



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

17 December 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 Regulation and Investment Screening 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 16th December 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 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-use**¹ goods and technology,
- *Specified*² goods and technology which might contribute to Russia's **military** and **technological enhancement**³,
- *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**,

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; 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.

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 – 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.



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**, 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.



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

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**, or certified by the Russian Maritime Register of Shipping, to access EU ports or locks.

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**,
- 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.



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](#)
- [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](#)