

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 (hereinafter: the 'Sanctions Regulation'), as amended by Council Regulation (EU) 2022/328 of 25 February 2022.

Contents

Overall structure and approach followed for this Guidance	5
1. What is the purpose of this Guidance and how do the new export restrictions in the Sanctions Regulation relate to existing sanctions against Russia?	5
2. What does the Sanctions Regulation do in the area of export restrictions, including export controls?	5
3. I am an exporter selling products to Russia. How can I verify that I am allowed to export the product and whether it requires any prior authorisation?.....	6
4. The new measures take the form of "prohibitions": is there now a total ban of exports to Russia for the dual-use and 'Advanced Technology' items?	6
5. What happened to EU exports to Russia on the day when the measures entered into force, if they were caught under the Sanctions Regulation?.....	7
6. What happened to EU exports to Russia on the day when the measures entered into force, if they were not caught under the Sanctions Regulation?	7
7. How does the new Sanctions Regulation relate to the existing Dual-Use Regulation? Does it supersede it? Do both continue to apply?.....	7
8. How does the 'catch-all' rule in the EU Dual-Use Regulation apply for entities listed in Annex IV of the Sanctions Regulation?	8
9. What restrictions apply to the provision of technical assistance and brokering services?.....	8
10. What information should be provided for notification and request for authorisation purposes for exports of dual-use or advanced technology items and the related technical assistance subject to exemptions or derogations under the Sanctions Regulation?	8
11. The item I am planning to export is not a dual-use item, nor is it included in Annex VII to the Sanctions Regulation. However, it includes a component listed in Annex I of the EU Dual-Use Regulation or in Annex VII to the Sanctions Regulation. Am I concerned by the export restrictions?	8
12. What situations are covered by the exemptions under the Sanctions Regulation?	9
13. What situations are covered by the case-by-case derogations under the Sanctions Regulation?	9
14. How can the exporter demonstrate conclusively that one of the exemptions or derogations applies to its situation?	10
15. Can you explain in more detail how exemptions and derogations operate concerning the exports of Dual-use items and 'Advanced Technology' items?	10
16. What rules and procedures apply to the authorisations pursuant to the Sanctions Regulation?	11

17.	Is it still possible to export to the individuals or entities listed in Annex IV? What rules apply to the subsidiaries of these entities or entities controlled by them?	11
18.	What if the exports of Dual-use or ‘Advanced Technology’ items do not appear to fall within the exemptions or the derogations, can I still apply for an authorisation?	12
19.	How did you select the items included in your list of ‘Advanced Technology’ products? ...	12
20.	How did you select the individuals and entities listed in Annex IV of the Sanctions Regulation?	12
	Practical operation of the export restriction of dual-use and ‘Advanced Technology’ items for businesses	12
21.	How can I verify/demonstrate that the technical specifications of the items I want to export do or do not fall under the Annex with ‘Advanced technology’ items?	12
22.	What is the meaning of the “indicative temporary correlation table” linking customs codes to items on Annex VII?	12
23.	Please clarify the term “tractor” in X.A.VII.001. Is it tractor for use in agriculture or does it refer to heavy trucks?	13
24.	How do I apply for a derogation concerning dual-use items?	13
25.	I have a contract with a Russian company involving the exports of an item covered by the Sanctions Regulation. Can I continue to export to them?	14
26.	To whom and how do I apply to in order to get my contract authorised to continue?	14
27.	Is it possible to authorise the grandfathering of a contract if there are reasonable grounds to believe that the end-user is a military end-user or if the goods might have a military end-use?15	
28.	Is it possible to execute contracts where the item was delivered before the entry into force of the Sanctions Regulation but some activities are still required for the completion of the contract? For example, can an EU-based company provide technical assistance in Russia in relation to an item which is covered by the Sanctions Regulation, if it was sold to a Russian end-user before the entry into force of the sanctions and fully paid by the end-user?	15
29.	How should the word “contracts” be interpreted? Has a contract been concluded if, for instance, an order has been placed in an electronic system of a European economic operator? Is it any contract with an existing customer in Russia, regardless of whether a specification of quantity and specific code numbers (e.g. CN-codes) have been agreed upon?	15
30.	Is an EU exporter allowed to fulfil a contract with a Russian entity requiring the export of an item covered by the Sanctions Regulation through a subsidiary of the Russian entity based in the EU or in a third country?.....	15
31.	To what extent are the sanctions measures binding on (i) subsidiaries of EU companies outside of the EU and (ii) EU nationals residing or working outside of the EU? How should Russian entities, which are owned or controlled by an EU company, act in light of the Sanctions Regulation? Can a Russia-based subsidiary of an EU company sell products covered by the Sanctions Regulation to other Russian entities if these products are in stock on the premises of the Russian subsidiary? Would this be seen as a circumvention?	16
32.	My company has equity in a joint venture in Russia. Can I continue supplying the joint venture with Dual-use or ‘Advanced Technology’ items subject to the sanctions?.....	17
33.	How should the term ‘other services’ be interpreted? Do logistic services count as ‘other services’ with the consequence that all carriers or other logistic companies have to check export restrictions relating to the goods they transport? Does it cover arranging transportation or	

logistics services for the importation of controlled items to the EU? What about other non-technical services, such marketing or cleaning services?	17
34. What are the grounds for annulling, suspending, modifying or revoking an authorisation?	17
35. Does the Sanctions Regulation prohibit imports from Russia to an EU Production Organisation Approval holder? Are Russia-based suppliers or subcontractors of EU/EASA Production Organisation Approval holders affected by the measures?.....	17
36. Do export licences issued before 26 February 2022 remain valid?	18
37. What about goods that are <i>en route</i> ? Do you have a “shipping” clause?	18
38. What is the effect of these sanctions on goods originating from a non-EU jurisdiction that are transiting through a Member State with Russia as final destination? Do the measures apply for transshipments via an EU country?	18
39. Is it required for EU companies to seek authorisation for the export of an item on Annex I of the EU Dual-Use Regulation or an ‘Advanced technology’ item to a Russian end-user if the item is already in Russia?	19
40. Does the Sanctions Regulation affect the export of controlled goods shipped in transit through Russia by land to third countries?.....	19
41. To what extent do the sanctions measures affect my business transactions with companies incorporated in the EU but which are directly or indirectly owned or controlled by Russian persons or entities?	19
42. Do I need to take specific measures towards my employees who are Russian nationals and are working in the EU? Should the EU entities block the transfer of and access to knowledge related to the products and technology covered by the new sanctions to Russia?.....	20
43. How does the EU ensure and verify that EU exports of items covered by the Sanctions Regulation to third countries are not re-exported to Russia?.....	20
44. Is Turkey obliged to implement equivalent controls and/or anti-circumvention measures due to its Customs Union with the EU?	20
45. I am based in Northern Ireland, can I continue to export to Russia items covered by the Sanctions Regulation?.....	20
46. Will there be compensation for companies exporting covered items to Russia as a result of these measures?	21
Work with Partner Countries	21
47. Your approach has been closely aligned with the United States, do you expect other countries to become “partner countries”?.....	21
48. Who are the partner countries and what benefits do they enjoy pursuant to the Regulation?	21
49. Is the US exempting the EU from its extraterritorial export controls?.....	22
Other miscellaneous questions.....	22
50. Is Belarus covered by the Sanctions Regulation?	22
Annex – Indicative temporary correlation table for items listed in Annex VII of the Sanctions Regulation	23

Disclaimers:

These Frequently Asked Questions (FAQ) provide information on export-related restrictions concerning dual-use goods and advance technology items pursuant to Articles 2, 2a and 2b of the Sanctions Regulation from the perspective of the Commission services. Only the Court of Justice of the EU can give an authoritative interpretation of Union legislation.

References to Articles and Annexes of the Sanctions Regulation are to the Council Regulation (EU) No 833/2014 of 31 July 2014, as amended by subsequent Council Regulations, in particular Council Regulation (EU) 2022/328 of 25 February 2022.

For the purpose of this FAQ the term ‘export restrictions’ refers to export-related restrictions concerning dual-use goods and advance technology items pursuant to Articles 2, 2a and 2b of the Sanctions Regulation.

For the purpose of this FAQ the term ‘exports’ refers to the sale, supply, transfer or export of items, as well as the provision of brokering services and of technical and financial assistance unless stated otherwise.

For the purpose of this FAQ, the term ‘authorisation’ refers to the authorisation of derogations pursuant to the Sanctions Regulation and dual-use authorisation pursuant to the EU Dual-Use Regulation.

For the purpose of this FAQ, the article numbering is based on the English language version of the Sanctions Regulation.

The Sanctions Regulation contains an export ban for goods and technology suited for use in aviation or the space industry as well as in the energy sector. These measures are not covered by this FAQ.

Overall structure and approach followed for this guidance

1. What is the purpose of this Guidance and how do the new export restrictions in the Sanctions Regulation relate to existing sanctions against Russia?

Council Regulation (EU) 2022/328 of 25 February 2022¹ builds on, and expands, the EU restrictive measures (sanctions) in form of export restrictions under the Sanctions Regulation². Unless amended by Council Regulation (EU) 2022/328 or other regulations, the existing provisions of the Sanctions Regulation remain in force and continue to apply.

This Guidance aims at supporting national competent authorities and stakeholders, including exporters, in the implementation of the new export restrictions introduced in Articles 2, 2a and 2b and the related provisions in Articles 1, 2c and 2d of the Sanctions Regulation, as amended in February 2022, without prejudice to the other provisions of that regulation.

2. What does the Sanctions Regulation do in the area of export restrictions, including export controls?

Firstly, the Sanctions Regulation has expanded the scope of export restrictions concerning dual-use goods and technologies as identified in Annex I of the EU Dual-Use Regulation³. The export of these items has been prohibited since 2014 for the military sector. Now the prohibition applies even when these items are intended for civilian users or uses, with very limited exemptions and derogations.

Secondly, the Sanctions Regulation also prohibits the export of additional 'Advanced Technology' items to limit the enhancement of Russia's military and technological capacity in sectors such as electronics, computers, telecommunications and information security, sensors and lasers, and marine.

Thirdly, the Sanctions Regulation identifies entities connected to Russia's defence and industrial base, on whom even tighter export restrictions are imposed.

As in other EU sanctions regimes, the export restrictions apply to the sale, supply, transfer and export of covered items, as well as the provision of brokering services and of technical and financial assistance.

The new provisions foresee very limited exemptions and derogations in certain defined situations further explained in this document. Similarly, the Sanctions Regulation allows for some possibility of continuing exporting under pre-existing, or "grandfathered" contracts, subject to a case-by-case assessment.

Lastly, the Sanctions Regulation contains an export ban for goods and technology suited for use in aviation or the space industry as well as in the energy sector. These measures are not covered by this FAQ.

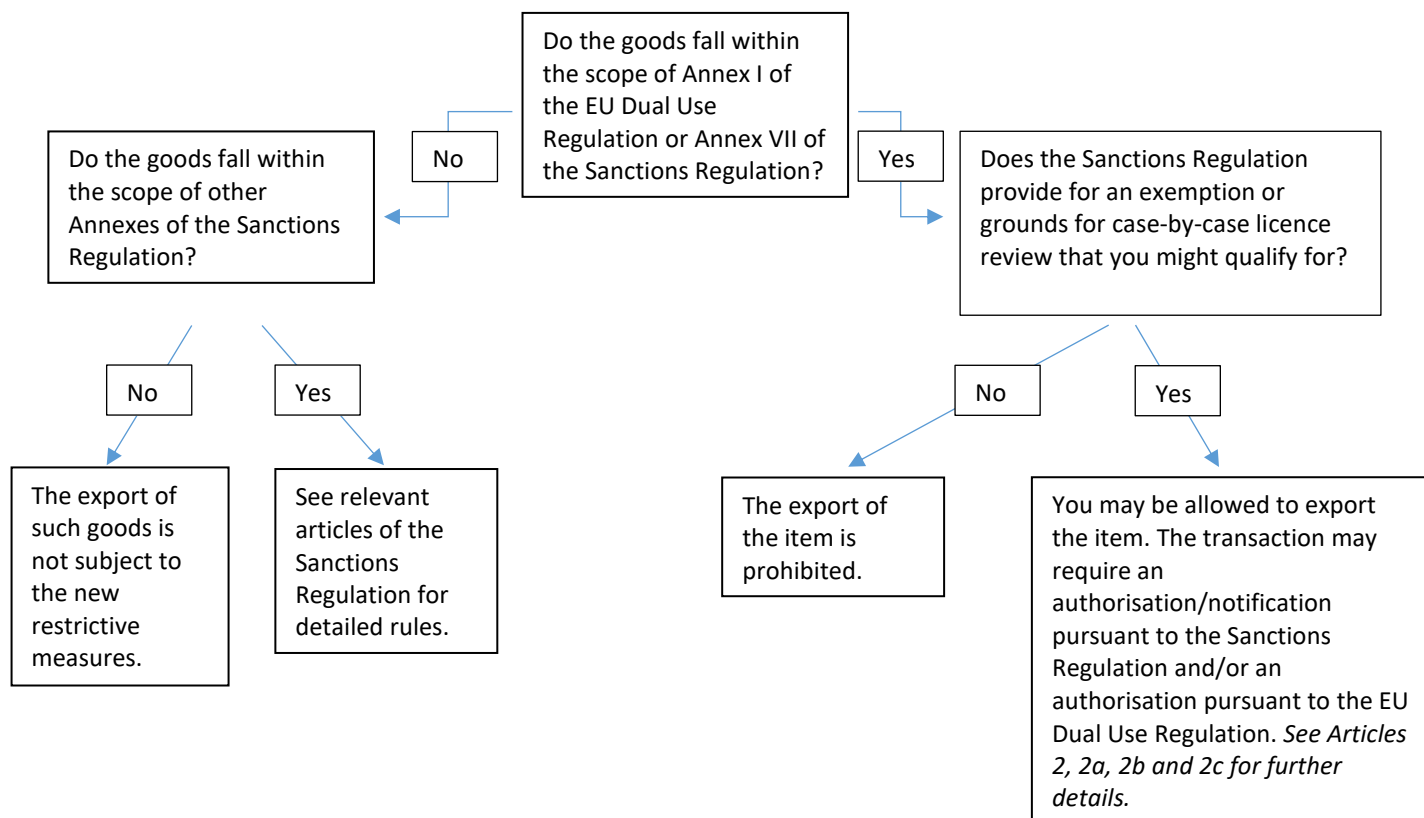
¹Council Regulation (EU) 2022/328 of 25 February 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

² Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine

³ Regulation (EU) 2021/821 of the European Parliament and of the Council of 20 May 2021 setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items.

3. I am an exporter selling products to Russia. How can I verify that I am allowed to export the product and whether it requires any prior authorisation?

In simplified terms, the process for verifying if you are concerned by an export restriction is the following:



This is a simplified diagram, for further clarification, please check with the relevant competent authorities of your Member State whether the Sanctions Regulation (or other restrictions) apply to the product you are selling to Russia.

Certain Annexes to the Sanctions Regulation, for example Annexes II, X and XI include, , codes of the Combined Nomenclature (CN), while dual-use items and advanced technology items listed in Annex VII are identified with technical descriptions. As part of its compliance obligations, the economic operator must verify, based on the CN code or the technical description, whether an item to be exported is covered or not. The fact that the CN code corresponding to an item is not listed in the Sanctions Regulation does not exclude that certain items classified under that CN code are affected because they may be dual-use items or those of Annex VII to the Sanctions Regulation, in accordance with Articles 2, 2a and 2b. As regards dual-use items and those of Annex VII of the Sanctions Regulation, there is no correlation in the Sanctions Regulation between the CN codes and such items subject to the restrictive measures.

4. The new measures take the form of “prohibitions”: is there now a total ban of exports to Russia for the dual-use and ‘Advanced Technology’ items?

The export restrictions applicable to items covered by Annex I to the EU Dual-Use Regulation and to ‘Advanced technology’ items take the form of prohibitions but there are limited exemptions and derogations. Exemptions cover, among others, humanitarian needs, health emergencies, natural

disasters, medical and pharmaceutical uses, temporary exports of equipment for use by news media, items for personal use. Derogations cover, among others, exports intended for government-to-government cooperation, exports intended for civilian telecommunications networks, exports for the operation, maintenance and safety of civil nuclear capabilities, or exports intended for companies owned, or solely or jointly controlled by an EU entity or the entity of a partner country, or exports covered by prior contracts.

These exemptions and derogations are not available for export to individuals or entities connected to Russia's defence and industrial base, as listed in Annex IV. For these entities, export is only permitted under the conditions specified in Art. 2b(1)(a) and (b).

In parallel, it should be noted that the exemptions and derogations mentioned above are also not available for exports for aviation or space industry.

5. What happened to EU exports to Russia on the day when the measures entered into force, if they were caught under the Sanctions Regulation?

The export restrictions entered into force and became fully applicable on 26 February 2022.

From that date, exports of goods and technology subject to the export restrictions introduced by the Sanctions Regulation are only allowed if permitted under (i) relevant exemptions, or (ii) derogations subject to authorisation. If an authorisation is required, until such an authorisation is granted, trade may not proceed.

6. What happened to EU exports to Russia on the day when the measures entered into force, if they were not caught under the Sanctions Regulation?

If the items are not covered by the Sanctions Regulation, they may be sold, supplied, transferred or exported to Russia without restrictions and the related provision of technical and financial assistance may continue. This is without prejudice to any other trade restrictions that might be in place under other provisions of the Regulation or under other regulations.

7. How does the new Sanctions Regulation relate to the existing Dual-Use Regulation? Does it supersede it? Do both continue to apply?

The Sanctions Regulation applies "without prejudice" – i.e. in parallel – to the EU Dual-Use Regulation (EU) 2021/821. Exporters must ensure they comply with both regulations.

Consequently, the export of dual-use items might require an authorisation under the Dual-Use Regulation and, where a derogation applies under the Sanctions Regulation, also under that regulation. In case of doubt, exporters should contact the competent authority of the Member State where the exporter is resident or established.

In case the export of a dual-use item or an 'Advanced technology' item in Annex VII falls under the scope of an exemption, no prior authorisation is required under the Sanctions Regulation. For dual-use items, however, an authorisation might still be required under the Dual-Use Regulation.

For authorisations for goods and technology listed in Annex VII of the Sanctions Regulation, the rules and procedures laid down in the EU Dual-Use Regulation apply, mutatis mutandis. This means, for

example, that when the export of an item not listed under Annex I of the Dual-Use Regulation is subject to an authorisation requirement under the Dual-Use Regulation for example under Article 4 (so-called 'catch-all' clauses), such authorisation requirements remain in place, notwithstanding the fact that the same item may be listed in Annex VII to the Sanctions Regulation.

8. How does the 'catch-all' rule in the EU Dual-Use Regulation apply for entities listed in Annex IV of the Sanctions Regulation?

The export of dual-use items for military end-use and end-users is prohibited under the Sanctions Regulation. The export of items not listed in Annex I to the EU Dual-Use Regulation nor under the Sanctions Regulation may still be subject to control under the "catch-all clause" of the Dual-Use Regulation, i.e. to ensure that they are not for military end-uses or end-users (including where the export concerns individuals or entities listed on Annex IV to the Sanctions Regulation).

9. What restrictions apply to the provision of technical assistance and brokering services?

The definition of 'technical assistance' and 'brokering services' can be found in Articles 1(c) and 1(d) of the Sanctions Regulation. The provision of such assistance or services falls under the prohibitions in Articles 2(2) and 2a(2) and it may be subject to the exemptions and derogations pursuant to Articles 2(3) and 2a(3) and Articles 2(4) and 2a(4) and Articles 2(5) and 2a(5).

10. What information should be provided for notification and request for authorisation purposes for exports of dual-use or advanced technology items and the related technical assistance subject to exemptions or derogations under the Sanctions Regulation?

The notification to the national competent authority and the request for authorisation must be submitted by electronic means. Annex IX to the Sanctions Regulation provides forms containing the mandatory elements for these notifications or applications and whenever possible, exporters should use these forms. However, when the use of the form is not possible, exporters shall provide at least all the elements described in the form and in the order provided set out in the forms.

If the item is covered by the EU Dual-Use Regulation, exporters must also submit the form(s) pursuant to that Regulation to the national competent authority.

The notification/application/authorisation form in Annex IX to the Sanctions Regulation only refers to the provisions of Articles 2, 2a and 2b. It does not affect the use of forms related to other provisions of the Sanctions Regulation.

11. The item I am planning to export is not a dual-use item, nor is it included in Annex VII to the Sanctions Regulation. However, it includes a component listed in Annex I of the EU Dual-Use Regulation or in Annex VII to the Sanctions Regulation. Am I concerned by the export restrictions?

Non-controlled items containing one or more components listed in Annex VII are not subject to the export restrictions applicable to the export of these components, provided that the transaction is not intended to circumvent rules on dual-use export control or the restrictions on 'Advanced technology' items pursuant to the Sanctions Regulation.

However, for items listed in Annex I to the EU Dual-Use Regulation, the “principal element” note continues to apply. This means that non-controlled items containing one or more components listed in that Annex remain subject to export controls rules pursuant to the EU Dual-Use Regulation, including the ‘principal elements rule’.

12. What situations are covered by the exemptions under the Sanctions Regulation?

Articles 2(3) and 2a(3) of the Sanctions Regulation provide for seven limited exemptions from the export restrictions provided that certain conditions and requirements are fulfilled, i.e. the use of the exemption is declared to the customs authorities and a notification is made the first time it is used. These exemptions apply to:

- (a) humanitarian purposes, health emergencies, the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment or as a response to natural disasters;
- (b) medical or pharmaceutical purposes;
- (c) temporary export of items for use by news media;
- (d) software updates;
- (e) use as consumer communication devices;
- (f) ensuring cyber-security and information security for natural and legal persons, entities and bodies in Russia except for its government and undertakings directly or indirectly controlled by that government; or
- (g) personal use of natural persons travelling to Russia or members of their immediate families travelling with them, and limited to personal effects, household effects, vehicles or tools of trade owned by those individuals and not intended for sale.

13. What situations are covered by the case-by-case derogations under the Sanctions Regulation?

Articles 2(4) and 2a(4) of the Sanctions Regulation provide for eight derogations where an authorisation must be requested from the national competent authority. Until the authorisation is granted, the export of the item is prohibited. The derogations cover situations where the item is intended for:

- (a) cooperation between the Union, the governments of Member States and the government of Russia in purely civilian matters;
- (b) intergovernmental cooperation in space programmes;
- (c) the operation, maintenance, fuel retreatment and safety of civil nuclear capabilities, as well as civil nuclear cooperation, in particular, in the field of research and development;
- (d) maritime safety;
- (e) civilian telecommunications networks, including the provision of internet services;
- (f) the exclusive use of entities owned, or solely or jointly controlled by a legal person, entity or body which is incorporated or constituted under the law of a Member State or of a partner country;
- (g) the diplomatic representations of the Union, Member States and partner countries, including delegations, embassies and missions.

For contracts concluded before 26 February 2022, please check [questions 25 to 27](#). For situations with individuals or entities listed in Annex IV, please check [question 17](#).

14. How can the exporter demonstrate conclusively that one of the exemptions or derogations applies to its situation?

It is for the national competent authority to determine the necessary documentation that might be useful to assess and verify that the conditions for exemptions or derogations are met. This documentation may include contracts, intergovernmental agreements, declarations from the exporter (self-declaration).

15. Can you explain in more detail how exemptions and derogations operate concerning the exports of Dual-use items and 'Advanced Technology' items?

The Sanctions Regulation prohibits the sale, supply, transfer or export, or the related provision of technical and financial assistance, of goods or technology to military end users in Russia, for military end uses and users listed in Annex IV to the Sanctions Regulation. This covers both Dual-use items (listed in Annex I of the EU Dual-Use Regulation) and 'Advanced Technology' items (listed in Annex VII to the Sanctions Regulation).

In relation to potential exports to non-military users not listed in Annex IV to the Sanctions Regulation or for non-military end uses of those goods and technology, the following applies:

- For Dual-use items listed in Annex I to the EU Dual-Use Regulation or under authorisation requirement due to the application of a catch-all clause:
 - if the intended end-use falls under the scope of the exemptions listed in Article 2(3) (see under [question 12](#)), it is not necessary to seek an authorisation pursuant to the Sanctions Regulation, but the exporter shall comply with the requirements pursuant to the EU Dual-Use Regulation. In addition, the Sanctions Regulation requires the exporter to declare in the customs declaration that the items are being exported under the relevant exemption and notify the competent authority of the Member State where the exporter is resident or established when they export for the first time using the relevant exemption within 30 days from the date when the first export took place. The national competent authorities will monitor the use of exemptions with a view to preventing any risk of circumvention of the measures.
 - if the intended end-use falls under the scope of any of the eight activities listed in Article 2(4) (see under [question 13](#)), the exporter shall apply for an authorisation and a case-by-case assessment is made by the competent authority of the Member State where the exporter is resident or established. In addition, the exporter shall comply with the requirements pursuant to the EU Dual-Use Regulation.
 - if the export falls under contracts concluded before 26 February 2022, please check [questions 25-27](#).

- For 'Advanced Technology' items as listed in Annex VII to the Sanctions Regulation:
 - if the intended end-use falls under the scope of the seven exemptions listed in Article 2a(3) (see under [question 12](#)), it is not necessary to seek an authorisation pursuant to the Sanctions Regulation. The Sanctions Regulation requires the exporter to declare in the customs declaration that the items are being exported under the relevant exemption and notify the competent authority of the Member State where the exporter is resident or established when they export for the first time using the relevant exemption within 30 days from the date when the first export took place.

The national competent authorities will monitor the use of exemptions with a view to preventing any risk of circumvention of the measures.

- if the intended end-use falls under the scope of activities listed in Article 2a(4) (see under [question 13](#)), the exporter shall apply for an authorisation and a case-by-case assessment is made by the competent authority of the Member State where the exporter is resident or established.
- if the export falls under contracts concluded before 26 February 2022, please check [questions 25 to 27](#).

In addition, as regards aviation and space industry items, please see [question 4](#), which confirms that the derogation and exemptions above are not available for those sectors.

16. What rules and procedures apply to the authorisations pursuant to the Sanctions Regulation?

Authorisations pursuant to Articles 2, 2a and 2b are processed by the national competent authorities listed in Annex I to the Sanctions Regulation and follow the rules and procedures laid down in the EU Dual-Use Regulation, which applies mutatis mutandis.

17. Is it still possible to export to the individuals or entities listed in Annex IV? What rules apply to the subsidiaries of these entities or entities controlled by them?

Stricter conditions apply for exports to certain end-users connected to Russia's defence and industrial base. With respect to these individuals and entities listed in Annex IV to the Sanctions Regulation, exemptions do not apply and only some very limited possibilities of case-by-case authorisation by national competent authorities apply for the urgent prevention or mitigation of an event likely to have a serious and significant impact on human health and safety or the environment. With regard to these individuals and entities, contracts concluded before 26 February 2022 may be executed, subject to an authorisation by the national competent authority, but trade must stop until such authorisation is granted. Such authorisations shall be requested before 1 May 2022.

Export restrictions to these entities do not apply if the items concerned are not listed in Annex VII to the Sanctions Regulation ('Advanced technology' items) nor listed in Annex I to the EU Dual-Use Regulation or subject to catch-all clauses under the EU Dual-Use Regulation. This is without prejudice to any other export restrictions that might be in place under other rules or regulations.

EU exporters must also ensure that the covered items do not reach the listed entities indirectly (via those entities' non-listed subsidiaries or other entities they control, or via an intermediary). The sale, supply, transfer or export of covered items to a third-party intermediary is also prohibited, if the items would reach the listed entity. In all situations, EU exporters should perform adequate due diligence on their business partners and the final destination of the goods.

EU exporters are furthermore prohibited from participating, knowingly and intentionally, in activities the object or effect of which is to circumvent these export restrictions.

18. What if the exports of Dual-use or ‘Advanced Technology’ items do not appear to fall within the exemptions or the derogations, can I still apply for an authorisation?

As a general rule, if you fall outside these situations there is no point in applying for an authorisation.

For the conditions applicable to the fulfilment of existing contracts, please check [questions 25-27](#).

19. How did you select the items included in your list of ‘Advanced Technology’ products?

The items included in the list of products in Annex VII were selected on the basis that they may contribute, directly or indirectly, to enhancing Russia’s military and technological capacity. They were also selected in cooperation with our partner countries.

20. How did you select the individuals and entities listed in Annex IV of the Sanctions Regulation?

The individuals and entities on the extended list are certain end-users connected to Russia’s defence and industrial base. They were also selected in cooperation with our partner countries.

Practical operation of the export restriction of dual-use and ‘Advanced Technology’ items for businesses

21. How can I verify/demonstrate that the technical specifications of the items I want to export do or do not fall under the Annex with ‘Advanced technology’ items?

Items in Annex VII are listed on the basis of their description and their technical parameters. When exporting to Russia and your items are subject to controls, you might be asked to provide any document needed to identify your item, and useful to its identification and classification, including, for example, technical datasheet where characteristics and technical parameters of your item are listed.

22. What is the “indicative temporary correlation table” linking customs codes to items in Annex VII?

Annex VII to the Sanctions Regulation listing ‘Advanced Technology’ items does not contain commodity (customs) codes.

[The Annex of this FAQ](#) includes, for purely informative purposes, a Correlation Table with references correlating the goods in Annex VII to the Sanctions Regulation with the corresponding commodity codes as defined under the rules of the Common Customs Tariff and Combined Nomenclature (CN). This is provided as courtesy to economic operators to help them in the identification and classification of goods in Annex VII that are subject to the measures set out in Article 2a(1) and 2b(1) of the Sanctions Regulation. The corresponding 8-digit CN codes provide a non-binding guide for economic operators to detect and identify the goods that they are declaring. It is not binding and is provided without

prejudice to all the obligations of the economic operator from the point of view of export control and sanctions to be checked at the moment of the lodging of the customs declaration.

It should be noted that, while the commodity codes support economic operators in their compliance efforts, an additional technical assessment is necessary for drawing conclusions as to whether a good is subject to the export restrictions. This additional technical assessment is often required as, in most cases, there is not a perfect match between the description of the goods in Annex VII and the description of corresponding commodity codes.

The commodity codes are taken from the Combined Nomenclature. This is defined in Article 1(2) of Council Regulation (EEC) No 2658/87⁴ and as set out in Annex I thereto, which are valid at the time of publication of the Sanctions Regulation.

23. Please clarify the term “tractor” in X.A.VII.001. Is it tractor for use in agriculture or does it refer to heavy trucks?

The term ‘tractor’ (Item X.A.VII.001.b in Annex VII) concerns off highway wheel tractors, which include agriculture tractors as long as they meet the technical parameters required in this control.

Heavy trucks understood as road trucks for semi-trailers are covered by item X.A.VII.001.c in the same annex.

24. How do I apply for a derogation concerning dual-use items?

To facilitate the notification and authorisation of sale, supply, transfer or export of items falling under the scope of Articles 2, 2a and 2b of the Sanctions Regulation, Annex IX of the Regulation provides a template with the mandatory elements of information to be provided by the exporter to the competent authority of the Member State where the exporter is resident or established.

If the item also falls under the scope of the EU Dual-Use Regulation, the exporter must also comply with the requirements pursuant to that Regulation, using the template made available in that Regulation.

The list of Member States’ competent authorities for the Sanctions Regulation is available in Annex I to the Sanctions Regulation.

The list of Member States’ competent authorities under the EU Dual-Use Regulation is published in the Official Journal of the European Union⁵. A [copy of that list](#) is available on the dedicated website of the Commission.

⁴ Council Regulation (EEC) No 2658/87 of 23 July 1987 on the tariff and statistical nomenclature and on the Common Customs Tariff

⁵ [Information note](#) - Regulation (EU) 2021/821 of the European Parliament and of the Council setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (OJ L 206, 11.6.2021, p. 1.): Information on measures adopted by Member States in conformity with Articles 4, 6, 7, 9, 11, 12, 22 and 23

25. I have a contract with a Russian company involving the exports of an item covered by the Sanctions Regulation. Can I continue to export to them?

In order to allow the fulfilment of contracts concluded before 26 February 2022, Member States may authorise the export of dual-use and 'Advanced technology' items for non-military uses and non-military users provided the exporter requests such an authorisation before 1 May 2022. These authorisations shall be assessed by the national competent authority on a case-by-case basis according to the applicable rules. Until the authorisation is received, exports of such items covered by the new sanctions are prohibited. Beyond 1 May 2022, it is not allowed to seek authorisation for the fulfilment of existing contracts and agreements.

National competent authorities shall not grant an authorisation if there are reasonable grounds to believe that the end-user might be a military end-user or an individual or entity listed in Annex IV, the goods might have a military end-use or the exports is intended for aviation or the space industry.

If the contract has been concluded before 26 February directly with an individual or entity listed in Annex IV, national competent authorities could authorise their continuation provided the exporter requests such an authorisation before 1 May 2022.

There is no reference in the Sanctions Regulation to the period of validity of such authorisation. In case the contract provides for the exports of a dual-use controlled item, the exporter needs to hold the necessary authorisation pursuant to the EU Dual-Use Regulation before the actual exports.

26. To whom and how do I apply to in order to get my contract authorised to continue?

To facilitate the authorisation of existing contracts, Annex IX to the Sanctions Regulation provides a template with the mandatory elements of information to be provided by the exporter to the competent authority of the Member State where the exporter is resident or established. If the item falls under the scope of the EU Dual-Use Regulation, the exporter must comply with the requirements pursuant to that Regulation as well.

The list of Member States' competent authorities is available in Annex I to the Sanctions Regulation.

The list of Member States' competent authorities under the EU Dual-Use Regulation is published in the Official Journal of the European Union⁶. A [copy of that list](#) is available on the [Dual-use export control webpage](#) of the Commission.

⁶ [Information note](#) - Regulation (EU) 2021/821 of the European Parliament and of the Council setting up a Union regime for the control of exports, brokering, technical assistance, transit and transfer of dual-use items (OJ L 206, 11.6.2021, p. 1.): Information on measures adopted by Member States in conformity with Articles 4, 6, 7, 9, 11, 12, 22 and 23

27. Is it possible to authorise the grandfathering of a contract if there are reasonable grounds to believe that the end-user is a military end-user or if the goods might have a military end-use?

No. The derogations in Articles 2(5) and 2a(5) are intended for non-military uses and for non-military users. Article 2(7) and Article 2a(7) provide that when deciding on requests for authorisations, the national competent authorities cannot grant an authorisation if they have reasonable grounds to believe that the end-user might be a military end-user or the goods might have a military end-use.

According to Article 2b(1) point (b), the grandfathering of a contract can be authorised in the case where the end-user is an entity or natural person listed in Annex IV.

28. Is it possible to execute contracts where the item was delivered before the entry into force of the Sanctions Regulation but some activities are still required for the completion of the contract? For example, can an EU-based company provide technical assistance in Russia in relation to an item which is covered by the Sanctions Regulation, if it was sold to a Russian end-user before the entry into force of the sanctions and fully paid by the end-user?

The execution of contracts where the items were delivered and some activities need to be undertaken by the seller (for example technical interviews with the customer; formal acceptance of the product/items; testing; contract closeout and milestones payment) requires an authorisation for the completion those parts of the contract concerning after-sale services.

29. How should the word “contracts” be interpreted? Has a contract been concluded if, for instance, an order has been placed in an electronic system of a European economic operator? Is it any contract with an existing customer in Russia, regardless of whether a specification of quantity and specific code numbers (e.g. CN-codes) have been agreed upon?

Articles 2(5), 2a(5), and 2b(1)(b) do not define the term ‘contracts’. Given that the object and purpose of those provisions is to enable, subject to authorisation, exporters to honour their contractual obligations under relevant domestic law, it is for the national competent authorities to assess under their domestic laws whether a contract has been concluded.

In general, in the context of EU sanctions, a contract is considered concluded where it contains all the necessary elements for the execution of a transaction (such as product, price, quantities, deliver dates, modalities of execution, etc.). If one of these essential elements is missing and would therefore require the signature of a subsequent agreement, the initial agreement should not be considered as a contract.

30. Is an EU exporter allowed to fulfil a contract with a Russian entity requiring the export of an item covered by the Sanctions Regulation through a subsidiary of the Russian entity based in the EU or in a third country?

The Sanctions Regulation prohibits "to sell, supply, transfer or export, directly or indirectly, [covered items], whether or not originating in the Union, to any natural or legal person, entity or body in Russia

or for use in Russia". It also prohibits "to participate, knowingly and intentionally, in activities the object or effect of which is to circumvent prohibitions" in the Regulation.

The EU exporter would therefore need to seek the authorisation of the national competent authorities under Articles 2(5), 2a(5), and 2b(1)(b) in order to be allowed to fulfil any contract requiring export of a covered item to Russia or for use in Russia.

If the subsidiary of the Russian entity is based in the EU, that subsidiary is itself bound to comply with the Sanctions Regulation.

EU exporters must also ensure that the covered items do not reach the listed entities indirectly (via those entities' non-listed subsidiaries or other entities they control, or via an intermediary). The sale, supply, transfer or export of covered items to a third-party intermediary is also prohibited, if the items would reach the listed entity. In all situations, EU exporters should perform adequate due diligence on their business partners and the final destination of the goods.

EU exporters are furthermore prohibited from participating, knowingly and intentionally, in activities the object or effect of which is to circumvent these restrictions.

31. To what extent are the sanctions measures binding on (i) subsidiaries of EU companies outside of the EU and (ii) EU nationals residing or working outside of the EU? How should Russian entities, which are owned or controlled by an EU company, act in light of the Sanctions Regulation? Can a Russia-based subsidiary of an EU company sell products covered by the Sanctions Regulation to other Russian entities if these products are in stock on the premises of the Russian subsidiary? Would this be seen as a circumvention?

The scope of application of the Sanctions Regulation is set out in Article 13; EU sanctions do not apply extraterritorially. The Sanctions Regulation applies, inter alia, to any person inside or outside the territory of the Union who is a national of a Member State, and to any legal person, entity or body, inside or outside the territory of the Union, which is incorporated or constituted under the law of a Member State.

Subsidiaries of EU companies are incorporated under the laws of the host country, thus bound by the host country laws. Nevertheless, EU nationals working for that subsidiary are personally bound by EU sanctions and can be held personally liable for participating in transactions which breach EU sanctions. For example, even if the subsidiary itself entered the transaction, EU nationals facilitating the transaction could still be covered by the anti-circumvention clause if they "participate in activities" the object or effect of which was to circumvent the main prohibition. In addition, decisions taken by the foreign subsidiary that need to be cleared/green-lighted by the EU parent company would be relevant, in that the latter is bound in respect of its own actions.

32. My company has equity in a joint venture in Russia. Can I continue supplying the joint venture with Dual-use or 'Advanced Technology' items subject to the sanctions?

If your EU-based company solely or jointly controls a joint venture company established in and under the laws of Russia and the item is intended for the exclusive use of the joint venture, it is possible to seek authorisation for the exports of the item. For the derogations applicable to exports intended to fulfil contracts concluded before 26 February 2022, please check [questions 25-27](#).

33. How should the term 'other services' be interpreted? Do logistic services count as 'other services' with the consequence that all carriers or other logistic companies have to check export restrictions relating to the goods they transport? Does it cover arranging transportation or logistics services for the importation of controlled items to the EU? What about other non-technical services, such marketing or cleaning services?

The term "other services" is comprehensive. It covers all services that are "related to the goods and technology referred to in paragraph 1 and to the provision, manufacture, maintenance and use of these goods and technology, directly or indirectly to any natural or legal person, entity or body in Russia, or for use in Russia".

34. What are the grounds for annulling, suspending, modifying or revoking an authorisation?

Member States' competent authorities under the EU Dual-Use Regulation issue export authorisations for dual-use items based on specific and case-by-case assessment. Where the national competent authorities have grounds for a review of their previous assessment, Article 16(1) of the EU Dual-Use Regulation allows them to annul, suspend, modify or revoke an export authorisation which was already granted.

This may be due to, among others, the changed assessment of risks associated to a specific end-use, end-user or destination of concern, or further restrictions to trade in goods that may have been adopted once the export authorisation was granted. There might, however, be also other reasons for a national competent authority to annul, suspend, modify or revoke export authorisations.

The Sanctions Regulation allows the national competent authorities to annul, suspend, modify or revoke an authorisation, which they have granted if they deem that such annulment, suspension, modification or revocation is necessary for the effective implementation of the Sanctions Regulation.

35. Does the Sanctions Regulation prohibit imports from Russia to an EU Production Organisation Approval holder? Are Russia-based suppliers or subcontractors of EU/EASA Production Organisation Approval holders affected by the measures?

The Sanctions Regulation does not affect imports from Russia.

However, EU importers should perform adequate due diligence and ensure that these imports and the associated payments do not breach other EU restrictive measures.

Notably, Council Regulation (EU) No 269/2014⁷ imposes an asset freeze on certain targeted persons and prohibits the making available of funds or economic resources to them, whether directly or indirectly. This includes payment for goods and services.

In addition, Council Regulation (EU) No 692/2014⁸ prohibits imports from Crimea and Sevastopol, and Council Regulation (EU) 2022/263⁹ prohibits imports from the non-government controlled areas of the Donetsk and Luhansk oblasts of Ukraine. The risk of diversion through Russia should be duly taken into account.

More details about the EU restrictive measures adopted in response to the crisis in Ukraine are available on the EU Sanctions Map¹⁰.

36. Do export licences issued before 26 February 2022 remain valid?

Export of dual-use items to Russia is prohibited, even for civilian uses, as of 26 February 2022. Some exemptions and derogations listed in the Sanctions Regulation, as well as the application of 'grandfathering clause', still allow export of dual-use items in very specific cases and under very strict conditions, including the need for additional export authorisations.

That being said, the Sanctions Regulation does not oblige the national competent authorities to suspend or revoke licences granted under the Dual-Use Regulation. It rather requires that the same exports comply with the new prohibitions on dual-use exports as set out in the Sanctions Regulation and can only continue under an exemption or a derogation.

37. What about goods that are *en route*? Do you have a "shipping" clause?

No. The Sanctions Regulation applies from 26 February 2022. It does not provide specific flexibilities for items that were under way inside the European Union on that date.

38. What is the effect of these sanctions on goods originating from a non-EU jurisdiction that are transiting through a Member State with Russia as final destination? Do the measures apply for transshipments via an EU country?

Goods located in the EU having Russia as a final destination, and which are included in the sanctions list, fall under the scope of Article 2, 2a and 2b of the Sanctions Regulation. The prohibition to sell, supply, transfer or export these goods, directly or indirectly, includes the prohibition to transit via the EU territory. Transit of prohibited goods between third countries across an EU country is thus prohibited.

External transit, transshipment, reshipment, re-exported from a free zone, temporary stored and directly re-exported from a temporary storage facility, introduced into the customs territory of the

⁷ Council Regulation (EU) No 269/2014 of 17 March 2014 concerning restrictive measures in respect of actions undermining or threatening the territorial integrity, sovereignty and independence of Ukraine, OJ L 78, 17.3.2014, p. 6-15.

⁸ Council Regulation (EU) No 692/2014 of 23 June 2014 concerning restrictive measures in response to the illegal annexation of Crimea and Sevastopol, OJ L 183, 24.6.2014, p. 9.

⁹ Council Regulation (EU) 2022/263 of 23 February 2022 concerning restrictive measures in response to the recognition of the non-government controlled areas of the Donetsk and Lugansk oblasts of Ukraine and the ordering of Russian armed forces into those areas, OJ L 421, 23.2.2022, p. 77-94.

¹⁰ <https://www.sanctionsmap.eu>

Union on the same vessel or aircraft that will take them out of that territory without unloading, and any other movement of goods entering in the EU and are destined to Russia, will be subject to the risk assessment by the customs authorities, which can decide whether the consignment is in the scope of the sanctions and therefore needing a control. These goods would be under customs supervision until they exit the customs territory of the Union (see Article 267(1) of Regulation (EU) No 952/2013 of the European Parliament and of the Council, of 9 October 2013, laying down the Union Customs Code).

39. Is it required for EU companies to seek authorisation for the export of an item on Annex I of the EU Dual-Use Regulation or an 'Advanced technology' item to a Russian end-user if the item is already in Russia?

The controls in the Sanctions Regulation apply also to the "sale, supply or transfer" of dual-use and "Advanced technology" items in addition to their export, including therefore, to the sale, supply or transfer of items already in Russia, for example where the items are held in inventory of an EU company in Russia (for example a branch of the EU company in Russia).

40. Does the Sanctions Regulation affect the export of controlled goods shipped in transit through Russia by land to third countries?

The Sanctions Regulation does not affect the export of controlled goods to be delivered in third countries, even if transiting through Russia. One element to be considered is the high risk of diversion of such items or any other possible risk of circumvention of the Sanction Regulation.

41. To what extent do the sanctions measures affect my business transactions with companies incorporated in the EU but which are directly or indirectly owned or controlled by Russian persons or entities?

The export restrictions pursuant to the Sanctions Regulation do not apply to transactions strictly within the EU between companies established in the EU. For details on contracts with EU-incorporated entities linked to listed persons or entities, see also [question 31](#).

Separately from the Sanctions Regulation, certain Russian persons and entities are targeted by individual financial restrictions, e.g. in Council Regulation (EU) No 269/2014. These restrictions include an asset freeze and a prohibition to make funds or economic resources available, directly or indirectly, to those listed persons and entities. Making funds or economic resources available to non-listed entities which are owned or controlled by a listed person or entity (including payments in exchange for goods) will in principle be considered as making them indirectly available to the latter, unless it can be reasonably determined, on a case-by-case basis using a risk-based approach, taking into account all of the relevant circumstances, that the funds will not reach the listed person or entity. Making funds or economic resources available to a third-party intermediary is also prohibited, if those assets would be for the benefit of the listed person or entity. In all situations, EU exporters should perform adequate due diligence on their business partners and the final destination of funds or economic resources.

EU exporters are furthermore prohibited from participating, knowingly and intentionally, in activities the object or effect of which is to circumvent these restrictions.

42. Do I need to take specific measures towards my employees who are Russian nationals and are working in the EU? Should the EU entities block the transfer of and access to knowledge related to the products and technology covered by the new sanctions to Russia?

Release of controlled technology (including knowledge or intangible items) to foreign persons is a kind of Intangible Technology Transfer also known as a “deemed export”.

Articles 2 and 2a of the Sanctions Regulation prohibit to sell supply, transfer or export, direct or indirectly, goods and technology subject to the measures to any natural or legal person, entity or body in Russia or for use in Russia. The requirements for the control of technical assistance also extends the control to foreign nationals in the EU. Therefore, companies should restrict the access of Russian staff to such knowledge or technology if such knowledge and technology would be used in Russia.

43. How does the EU ensure and verify that EU exports of items covered by the Sanctions Regulation to third countries are not re-exported to Russia?

EU operators should have in place adequate due diligence procedures to ensure that their exports of covered items are not diverted to Russia. This could include, for instance, contractual clauses with their third-country business partner giving rise to liability in case the latter re-exports the items to Russia, as well as ex post verifications.

It is for Member States to implement and enforce sanctions. The Commission monitors sanctions’ implementation and enforcement by Member States. If a covered item exported from the EU to a third country is re-exported to Russia, national competent authorities may consider the EU exporter’s failure to conduct adequate due diligence as a breach of the Sanctions Regulation. If the EU exporter knowingly and intentionally fails to conduct such due diligence, this can be considered as participation in a circumvention scheme.

44. Is Turkey obliged to implement equivalent controls and/or anti-circumvention measures due to its Customs Union with the EU?

The territorial scope of the Sanctions Regulation is limited to the EU. The existence of a customs union between Turkey and the Union does not imply an automatic extension of the territorial scope of the sanctions – this has not been provided in the EU-Turkey Customs Union Agreement. The latter provides that Turkey has an obligation to align with measures with the Common Commercial Policy of the Customs Union. Conversely, as the sanctions have a legal basis related to the EU’s Common Foreign and Security Policy, they do not fall under Turkey’s commitment to align its measures with Common Commercial Policy in the Customs Union. In that respect, Turkey is treated like any other third country that does not apply the same sanctions as the EU.

45. I am based in Northern Ireland, can I continue to export to Russia items covered by the Sanctions Regulation?

Under the Ireland / Northern Ireland Protocol, and specifically section 47 of Annex 2 thereto, sanctions based on Article 215 TFEU apply automatically also to Northern Ireland in so far as they concern trade in goods. This means that the restrictions under the Sanctions Regulation relating to trade in goods apply also to trade between Northern Ireland and Russia.

In addition, the general rules on the scope of application of the Sanctions Regulation under Article 13 apply.

46. Will there be compensation for companies exporting covered items to Russia as a result of these measures?

The Sanctions Regulation does not provide for compensation for companies exporting covered items to Russia.

Work with Partner Countries

47. Your approach has been closely aligned with the United States, do you expect other countries to become “partner countries”?

The scope of export restrictions has been closely coordinated with those countries that are expected to apply substantially equivalent trade measures. This is the case in particular for the U.S., where our cooperation builds on our engagement in the framework of the EU-U.S. Trade and Technology Council. Our cooperation will be stepped up following the adoption of the measures in order to ensure adequate coordination and a level playing field for EU and U.S. companies.

The Sanctions Regulation contains a list of partner countries that may be amended to add other countries that have substantially equivalent trade measures.

48. Who are the partner countries and what benefits do they enjoy pursuant to the Regulation?

For the purpose of these measures, ‘partner countries’ are countries that are applying a set of export restriction measures substantially equivalent to those set out in the Sanctions Regulation. The list of partner countries is annexed to the Regulation and as of 26 February 2022, it includes the U.S. The Commission will keep reviewing the measures adopted by third countries and maintaining close contacts with them with a view to ensuring effective sanctions.

The concept of “partner country” has several dimensions related to Articles 2 and 2a of the Sanctions Regulation:

Firstly, entities owned or controlled by an undertaking of a partner country are eligible for the same exception as those owned or controlled by an undertaking of a Member State. As a result, Member States may authorise the sale, supply, transfer or export of covered goods and technology or the provision of related technical or financial assistance to these undertakings, provided that it is not intended for military use or for a military end user.

Secondly, Member States may authorise the sale, supply, transfer or export of covered goods and technology, or the provision of related technical or financial assistance intended for the diplomatic representations of partner countries located in Russia.

Thirdly, the EU will exchange information with partner countries, where appropriate, and on the basis of reciprocity, with a view to supporting the effectiveness of export restrictions under the Sanctions Regulation and the consistent application of export restriction measures applied by partner countries.

49. Is the US exempting the EU from its extraterritorial export controls?

The U.S. has waived its so-called Foreign Direct Product Rule (section 734.9 of the EAR) and de-minimis rule (section 734.4(a) of the EAR) for the Advanced Technology items listed in Annex VII. The U.S. also waived the FDPR in the case of Dual-use items.

Furthermore, the US will not apply extraterritorial controls to items, where controlled item included in Annex VII is the principal element of the exported item but the exported item itself is not covered by the Sanctions Regulation, provided that the national competent authority exercises due diligence set out in Article 2(7) and Article 2a(7) of the Sanctions Regulation.

Other miscellaneous questions

50. Is Belarus covered by the Sanctions Regulation?

No. The additional sanctions imposed on Belarus including further restrictions on trade are set out [in Council Regulation \(EU\) 2022/355](#) of 2 March 2022 amending Regulation (EC) No 765/2006 concerning restrictive measures in view of the situation in Belarus. These, however, largely mirror the approach set out above.

Annex – Indicative temporary correlation table for items listed in Annex VII of the Sanctions Regulation

ANNEX VII TO REGULATION (EU) 2022/328

TARIC MEASURES

Integrated tariff of the Community (TARIC), held in a Commission database, contains import and export measures applicable to specific goods, such as tariff suspensions, tariff quotas, tariff preferences, anti-dumping duties, quantitative restrictions, embargoes but also export controls. By integrating and coding these measures, the TARIC secures their uniform application by all Member States and gives all economic operators a clear view of all measures to be undertaken when importing into the EU or exporting goods from the EU.

Regarding the items included in Annex VII of the regulation (EU) 2022/328, TARIC measures at 8-digit level have been made available on 4 March to the concerned authorities and the stakeholders.

CORRELATION TABLE

The Correlation Table links the goods in Annex VII with the corresponding commodity codes as defined under the rules of the Common Customs Tariff and Combined Nomenclature (CN). The corresponding 8-digit CN codes define the customs classification of the goods and the codes to be entered in the customs declaration.

This correlation table is not binding and is provided without prejudice to the obligations of the economic operator under export controls and restrictive measures, which will be checked, in particular, when lodging of the customs declaration.

It should be noted that, in many cases, the list of CN codes in the Correlation Table is not sufficient. Additional technical assessment is necessary for drawing conclusions as to whether a good is subject to the measures. This additional assessment is necessary because, in many cases, the description of the CN code is not specific enough to correspond exactly to the control text of the items in Annex VII. It should be noted that this correlation table does not include the correlations to software, for the following reasons:

- the CN classification is not based on the content of the software but on its support (flash-drive, DVD, etc.);
- software is often exported as part of related equipment or products, and therefore the CN code to be declared by the exporter is the one that relates to the equipment or products;
- most of the times software is not sent to the recipient through Customs but through the cloud, or by means any computing server.

It should also be noted that this correlation table does not include the correlations to technology, since the export of intangible items is not declared at Customs.

The CN codes are taken from the Combined Nomenclature as defined in Article 1(2) of Council Regulation (EEC) No 2658/87 of 23 July 1987 on the tariff and statistical nomenclature and on the 2022 Common Customs Tariff and as set out in Annex I thereto, which are valid at the time of publication of the Sanctions Regulation. The Correlation Table will be revised, when appropriate, in light of revisions to the list of goods in Annex VII and/or of the corresponding commodity codes.

For greater clarity, major components include any assembled elements, which form a portion of an end item without which the end item is inoperable.

CORRELATION TABLE (ANNEX VII)

Annex VII code	Control list (short description)	Related 2022 CN Code
X.A.I.001.a	"Microprocessor microcircuits", "microcomputer microcircuits", and microcontroller microcircuits...	8542.31.11
		8542.31.19
		8542.31.90
X.A.I.001.b	Storage integrated circuits...	8542.32.45
		8542.32.69
		8542.32.75
X.A.I.001.c	Analog-to-digital converters...	8542.31.11
		8542.31.19
		8542.31.90
X.A.I.001.d	Field programmable logic devices having a maximum number of single-ended digital input/outputs between 200 and 700;	8542.31.11
		8542.31.19
		8542.31.90
X.A.I.001.e	Fast Fourier Transform (FFT) processors having a rated execution time for a 1 024 point complex FFT of less than 1 ms;	8542.31.11
		8542.31.19
		8542.31.90
X.A.I.001.f	Custom integrated circuits...	8542.31.11
		8542.31.19
		8542.31.90
X.A.I.001.g	Traveling-wave "vacuum electronic devices"...	8542.31.11
		8542.31.19
		8542.31.90
X.A.I.001.h	Flexible waveguides designed for use at frequencies exceeding 40 GHz	8543.30.70
X.A.I.001.i	Surface acoustic wave and surface skimming acoustic wave devices...	8543.70.06
X.A.I.001.j	Cells as follows 1. "Primary cells" having an "energy density" of 550 Wh/kg or less at 293 K (20°C); 2. "Secondary cell	8506.50.10
		8506.50.90
		8507.60.00
X.A.I.001.k	"Superconductive" electromagnets or solenoids "specially designed"...	8505.90.29
X.A.I.001.l	Circuits or systems for electromagnetic energy storage...	8504.40.90
		8504.50.00
X.A.I.001.m	Hydrogen/hydrogen-isotope thyratrons...	8540.89.00

X.A.I.001.o	Solar cells, cell-interconnect-coverglass assemblies, solar panels, and solar arrays...	8541.42.00
		8541.43.00
X.A.I.002.a	Electronic test equipment...	9030.10.00
		9030.20.00
		9030.31.00
		9030.32.00
		9030.33.20
		9030.33.70
		9030.39.00
		9030.40.00
		9030.82.00
		9030.84.00
		9030.89.00
		9030.90.00
X.A.I.002.b	Digital instrumentation magnetic tape data recorders...	8542.31.11
		8542.31.19
X.A.I.002.c	Equipment to convert digital video magnetic tape recorders...	8542.31.11
		8542.31.19
X.A.I.002.d	Non-modular analog oscilloscopes...	9030.20.00
X.A.I.002.e	Modular analog oscilloscope systems...	9030.20.00
X.A.I.002.f	Analog sampling oscilloscopes...	9030.20.00
X.A.I.002.g	Digital oscilloscopes and transient recorders...	9030.20.00
X.A.I.003.a	Frequency changers...	8504.40.84
		8504.40.88
		8504.40.90
X.A.I.003.b	Mass spectrometers	9027.81.00
X.A.I.003.c	All flash x-ray machines...	9022.19.00
		9022.29.00
		9022.30.00
		9022.90.20
X.A.I.003.d	Pulse amplifiers...	8543.70.02
		8543.70.30
		8543.70.90
X.A.I.003.e	Electronic equipment for time delay generation or time interval measurement...	9027.89.90
X.A.I.003.f	Chromatography and spectrometry analytical instruments...	9027.20.00
		9027.30.00
X.B.I.001.a	Equipment "specially designed" for the manufacture of electron tubes, optical elements and "specially designed" "parts" and "components" therefor...	8464.20.11
		8475.10.00
X.B.I.001.b.1.a	Equipment for producing polycrystalline silicon and materials controlled by 3C001...	8486.10.00
X.B.I.001.b.1.b	Equipment "specially designed" for purifying or processing III/V and II/VI semiconductor materials...	8486.10.00
X.B.I.001.b.1.c	Crystal pullers and furnaces...	8486.10.00
X.B.I.001.b.1.d	"Stored program controlled" equipment for epitaxial growth...	8486.10.00

X.B.I.001.b.1.e	Molecular beam epitaxial growth equipment	8486.10.00
X.B.I.001.b.1.f	Magnetically enhanced 'sputtering' equipment...	8486.10.00
X.B.I.001.b.1.g	Equipment "specially designed" for ion implantation, ion-enhanced or photo-enhanced diffusion...	8486.10.00
X.B.I.001.b.1.h	"Stored program controlled" equipment for the selective removal...	8486.10.00
X.B.I.001.b.1.i	"Chemical vapor deposition" (CVD) equipment...	8486.10.00
X.B.I.001.b.1.j	Electron beam systems...	8486.10.00
X.B.I.001.b.1.k	Surface finishing equipment for the processing of semiconductor wafers...	8486.10.00
X.B.I.001.b.1.l	Interconnection equipment...	8486.10.00
X.B.I.001.b.1.m	"Stored program controlled" equipment using "lasers" ...	9011.20.10
		9031.41.00
X.B.I.001.b.2.a	Finished masks, reticles and designs therefor...	3701.99.00
X.B.I.001.b.2.b	Mask "substrates"...	3701.99.00
X.B.I.001.b.2.c	Equipment "specially designed" for computer aided design (CAD) of semiconductor devices or integrated circuits...	8486.10.00
X.B.I.001.b.2.d	Equipment or machines, as follows, for mask or reticle fabrication...	8486.10.00
X.B.I.001.b.2.e	"Stored program controlled" equipment for the inspection of masks, reticles or pellicles...	9011.20.10
		9031.41.00
X.B.I.001.b.2.f	Align and expose equipment for wafer production...	8486.10.00
X.B.I.001.b.2.g	Electron beam, ion beam or X-ray equipment for projection image transfer	8486.10.00
X.B.I.001.b.2.h	Equipment using lasers for direct write of wafers capable of producing patterns less than 2,5 micrometers...	8486.20.00
X.B.I.001.b.3	"Stored program controlled" die bonders...	8486.20.00
X.B.I.001.b.3	"Stored program controlled" equipment for producing multiple bonds in a single operation...	8486.20.00
X.B.I.001.b.3	Semi-automatic or automatic hot cap sealers...	8486.20.00
X.B.I.001.b.4	Filters for clean rooms...	8421.99.90
X.B.I.002.a	Equipment "specially designed" for the inspection or testing...	9031.80.80
X.B.I.002.b	Equipment "specially designed" for the inspection or testing of semiconductor devices, integrated circuits and "electronic assemblies"...	9030.82.00
		9031.41.00
X.C.I.001	Positive resists designed for semiconductor lithography specially adjusted (optimised) for use at wavelengths between 370 and 193 nm.	3920.10.23
		8486.90.00
X.A.II.001.a	Electronic computers and related equipment, and "electronic assemblies" and "specially designed" "parts" and "components" therefor, rated for operation at an ambient temperature above 343 K (70°C)	8471.41.00
		8471.49.00
		8471.50.00
		8471.80.00
X.A.II.001.b	"Digital computers", including equipment of "signal processing" or image enhancement", having an "Adjusted Peak Performance" ("APP") equal to or greater than 0.0128 Weighted TeraFLOPS (WT)	8471.41.00
		8471.49.00
		8471.50.00
		8471.80.00
X.A.II.001.c		8471.41.00

	"Electronic assemblies" that are "specially designed" or modified to enhance performance by aggregation of processors	8471.49.00
		8471.50.00
		8471.80.00
X.A.II.001.f	Equipment for "signal processing" or "image enhancement" having an "Adjusted Peak Performance" ("APP") equal to or greater than 0.0128 Weighted TeraFLOPS WT	8471.41.00
		8471.49.00
		8471.50.00
		8471.80.00
X.A.II.001.i	Equipment containing "terminal interface equipment" exceeding the limits in 5A991	8471.41.00
		8471.49.00
		8471.50.00
		8471.80.00
X.A.II.001.j	Equipment "specially designed" to provide external interconnection of "digital computers" or associated equipment that allows communications at data rates exceeding 80 Mbyte/s	8471.41.00
		8471.49.00
		8471.50.00
		8471.80.00
X.A.II.001.k	"Hybrid computers" and "electronic assemblies" and "specially designed" "parts" and "components" therefor containing analog-to-digital converters	8471.41.00
		8471.49.00
		8471.50.00
		8471.80.00
X.A.III.101.a	Any type of telecommunications equipment, not controlled by 5A001.a, "specially designed" to operate outside the temperature range from 219 K (-54 °C) to 397 K (124 °C)	8517.61.00
		8517.62.00
		8517.69.30
		8517.69.90
		8517.79.00
X.A.III.101.b.1	Employing digital techniques ...	8517.69.30
		8517.69.90
X.A.III.101.b.2	Modems using the 'bandwidth of one voice channel' with a "data signaling rate" exceeding 9,600 bits per second	8517.69.30
		8517.69.90
X.A.III.101.b.3	Being "stored program controlled" digital cross connect equipment with "digital transfer rate" exceeding 8.5 Mbit/s per port.	8517.69.30
		8517.69.90
X.A.III.101.b.4	Being equipment containing ...	8517.69.30
		8517.69.90
X.A.III.101.b.5	Employing a "laser" ...	8517.69.30
		8517.69.90
X.A.III.101.b.6	Radio equipment operating at input or output frequencies exceeding ...	8517.69.30
		8517.69.90
X.A.III.101.b.7	Being radio equipment employing ...	8517.69.30
		8517.69.90
X.A.III.101.c.1	Data (message) switching" equipment or systems designed for "packet-mode operation" and "parts," electronic assemblies and "components" therefor,	8517.62.00
X.A.III.101.c.3	Routing or switching of 'datagram' packets	8517.62.00
X.A.III.101.c.5	Multi-level priority and pre-emption for circuit switching	8517.62.00

X.A.III.101.c.6	Designed for automatic hand-off of cellular radio calls to other cellular switches or automatic connection to a centralized subscriber data base common to more than one switch	8517.62.00
X.A.III.101.c.7	Containing "stored program controlled" digital cross connect equipment with "digital transfer rate" exceeding 8.5 Mbit/s per port	8517.62.00
X.A.III.101.c.8	"Common channel signaling" operating in either non-associated or quasi-associated mode of operation	8517.62.00
X.A.III.101.c.9	'Dynamic adaptive routing'	8517.62.00
X.A.III.101.c.10	Being packet switches, circuit switches and routers	8517.62.00
X.A.III.101.c.11	"Optical switching"	8517.62.00
X.A.III.101.c.12	Employing 'Asynchronous Transfer Mode' ('ATM') techniques	8517.62.00
X.A.III.101.d	Optical fibres and optical fibre cables of more than 50 m in length designed for single mode operation	8536.70.00
X.A.III.101.e	Centralized network control...	8517.61.00
X.A.III.101.f	Phased array antennas...	8517.71.00
X.A.III.101.f		8529.10.69
X.A.III.101.g	Mobile communications equipment...	8517.13.00
		8517.14.00
		8517.79.00
X.A.III.101.h	Radio relay communications equipment...	8517.62.00
X.B.III.101	Telecommunications test equipment...	9030.10.00
		9030.20.00
		9030.31.00
		9030.32.00
		9030.33.20
		9030.33.70
		9030.39.00
		9030.40.00
		9030.82.00
		9030.84.00
		9030.89.00
9030.90.00		
X.C.III.101	Preforms of glass or of any other material optimized for the manufacture of optical fibres	7002.20.10
X.A.IV.001	Marine or terrestrial acoustic equipment...	9014.80.00
X.A.IV.002.a	Image intensifier tubes...	9022.90.80
X.A.IV.002.b	Direct view imaging equipment...	8525.83.00
X.A.IV.003	Cameras that meet the criteria of Note 3 to 6A003.b.4.	8525.83.00
X.A.IV.004.a	Optical filters...	9002.20.00
X.A.IV.004.b	"Fluoride fibre" cable, or optical fibres thereof...	8536.70.00
X.A.IV.005.a	Carbon dioxide (CO ₂) "lasers"	9013.20.00
X.A.IV.005.b	Semiconductor lasers...	9013.20.00
		9013.80.00
X.A.IV.005.c	Ruby "lasers" ...	9013.20.00
X.A.IV.005.d	Non- "tunable" "pulsed lasers"...	9013.20.00

X.A.IV.005.e	Non- "tunable" continuous wave "(CW) lasers" ...	9013.20.00
X.A.IV.005.f	Non-"tunable" "lasers" ...	9013.20.00
X.A.IV.005.g	Free electron "lasers" ...	9013.20.00
X.A.IV.006	"Magnetometers", "Superconductive" electromagnetic sensor...	9015.80.20
X.A.IV.007	Gravity meters...	9015.80.20
X.A.IV.008	Radar systems...	8526.10.00
X.A.IV.009.a	Seismic detection equipment...	9015.80.20
X.A.IV.009.b	Radiation hardened TV cameras...	8525.82.00
X.A.IV.009.c	Seismic intrusion detection systems...	9031.80.80
X.B.IV.001.a	Equipment, including tools, dies, fixtures or gauges for the manufacture or inspection of free electron "laser" magnet wigglers	9031.49.90
X.B.IV.001.b	Equipment, including tools, dies, fixtures or gauges for the manufacture or inspection of free electron "laser" photo injectors	9031.49.90
X.C.IV.001	Optical sensing fibres...	8536.70.00
X.C.IV.002.a	Low optical absorption materials... fluorides of zirconium or aluminum	2826.12.00
		2826.19.90
X.C.IV.002.b	'Optical fibre preforms'...	7002.20.10
X.A.V.001	Airborne communications equipment, all "aircraft" inertial navigation systems, and other avionic equipment, including components	8517.69.30
		8526.91.20
		9014.10.00
		9014.20.20
		9014.20.80
X.B.V.001	Other equipment for the test, inspection, or "production" of navigation and avionics equipment	9014.90.00
		9030.82.00
X.A.VI.001.a	Underwater vision systems...	9006.30.00
X.A.VI.001.b	Photographic still cameras "specially designed" or modified for underwater use, having a film format of 35 mm or larger, and having autofocusing or remote focusing "specially designed" for underwater use	9006.30.00
X.A.VI.001.c	Stroboscopic light systems, "specially designed" or modified for underwater use, capable of a light output energy of more than 300 J per flash	9029.20.90
X.A.VI.001.d	Other underwater camera equipment...	9006.30.00
X.A.VI.001.f	Vessels	8901.10.10
		8901.10.90
		8901.20.10
		8901.20.90
		8901.30.10
		8901.30.90
		8901.90.10
		8901.90.90
		8902.00.10
		8902.00.90
		8903.21.00

		8903.22.10
		8903.22.90
		8903.23.10
		8903.23.90
		8903.31.00
		8903.32.10
		8903.32.90
		8903.33.10
		8903.33.90
		8903.93.10
		8903.93.90
		8903.99.10
		8903.99.90
		8904.00.10
		8904.00.91
		8904.00.99
		8905.10.10
		8905.10.90
		8905.90.10
		8905.90.90
		8906.10.00
		8906.90.10
		8906.90.91
		8906.90.99
		8908.00.00
X.A.VI.001.g	Marine engines (both inboard and outboard) and submarine engines	8406.10.00
		8407.21.10
		8407.21.91
		8407.21.99
		8407.29.00
		8408.10.11
		8408.10.19
		8408.10.23
		8408.10.27
		8408.10.31
		8408.10.39
		8408.10.41
		8408.10.49
		8408.10.51
		8408.10.59
		8408.10.61
		8408.10.69
		8408.10.71
		8408.10.79
		8408.10.81

		8408.10.89
		8408.10.91
		8408.10.99
X.A.VI.001.h	Self-contained underwater breathing apparatus (scuba gear) and related equipment	9506.29.00
X.A.VI.001.i	Life jackets, inflation cartridges, dive compasses and dive computers	9506.29.00
X.A.VI.001.j	Underwater lights and propulsion equipment	9405.42.10
		8906.90.10
X.A.VI.001.k	Air compressors and filtration systems “specially designed” for filling air cylinders.	8414.40.10
X.A.VII.001.a	Diesel engines, other than those specified in the CML or in Regulation (EU) 2021/821, for trucks, tractors, and automotive applications, having an overall power output of 298kW or more.	8408.20.37
		8408.20.99
X.A.VII.001.b	Off highway wheel tractors of carriage capacity 9 t or more; and major components and accessories, other than those specified in the CML or in Regulation (EU) 2021/821.	8701.95.10
X.A.VII.001.c	Road tractors for semi-trailers, with single or tandem rear axles rated for 9 t per axel or more and specially designed major components	8701.95.90
X.A.VII.002.c	Gas turbine engines and components, other than those specified in the CML or in Regulation (EU) 2021/821	8411.11.00
		8411.12.10
		8411.12.30
		8411.12.80
		8411.21.00
		8411.22.20
		8411.22.80
		8411.82.80
		8411.91.00
X.A.VII.002.e	Pressurized aircraft breathing equipment	9020.00.10
		9020.00.90
X.B.VII.001	Vibration test equipment and “specially designed” “parts” and “components,”...	9031.20.00
		9031.80.20
X.B.VII.002.a	Automated equipment using non-mechanical methods for measuring airfoil wall thickness	9031.80.20
X.B.VII.002.b	Tooling, fixtures or measuring equipment for the “laser”, water jet or ECM/EDM hole drilling processes...	8466.10.20
		8466.10.38
		8466.20.20
		8466.20.98
		8466.93.50
		8466.93.60
X.B.VII.002.c	Ceramic core leaching equipment	8454.30.90
X.B.VII.002.d	Ceramic core manufacturing equipment or tools	8514.11.00
		8514.19.80